DATE:	July 9, 2025
TO:	DLCD Housing Division
FROM:	ECOnorthwest
SUBJECT:	OHNA Rulemaking – Potential Compliance Pathways

The Oregon Department of Land Conservation and Development (DLCD) is the state agency charged with leading a rulemaking process to develop what has been termed *compliance pathways*. DLCD has defined *compliance pathways* as rules that create required or optional assumptions or actions that Oregon cities must (or may) take to comply with state land use law while completing their Contextualized Housing Need (CHN) analysis and / or their Housing Production Strategy (HPS).

To advance toward final rules, the state asked ECOnorthwest to bring forward relevant available data and analysis to inform the state's decisions about compliance pathways for identifying key needs in the CHN and for action selection in the HPS that could support the state's policy objectives for these efforts. The state asked ECOnorthwest to offer advice regarding whether the data are sufficient to support quantitative metrics in each compliance pathway and given data availability and the state's desired policy outcomes, whether and how compliance pathways could be established.

In early May, the state asked ECOnorthwest specific research questions (described in more detail later in the memorandum), and then later (on June 12), asked us to document our findings in this memorandum. The expectation of this undertaking was that ECO's responses would help to advance discussions with stakeholders and support DLCD's ongoing rulemaking effort. ECOnorthwest's advice reflects the firm's perspective, and not necessarily that of the state. Because the advice in this memo was developed without the benefit of valuable stakeholder perspectives, ECOnorthwest does not intend these to be adapted as-is into the rules. In fact, our advice generally offers DLCD options or considerations rather than clear conclusions, especially when the timeline and / or available data did not allow it.

This memorandum will be provided to the Housing Actions Workgroup (HAWG) for discussion in July, and the state will then develop rules in the second half of 2025. We hope that ECOnorthwest's advice will be helpful in advancing the rulemaking process and the state's policy objectives.

Organization of this Memo

This memorandum outlines research questions posed to ECOnorthwest, outcomes of the analysis, and potential compliance pathway options for consideration as the state develops rules related to the Contextualized Housing Need (CHN, part 1) and Housing Production Strategies (HPS, part 2). Each part of the compliance pathway analysis is supported by a data appendix beginning on page 34.

Context: Policy Objectives and Types of Compliance Pathways

The state's goal in developing compliance pathways and other rules to implement the OHNA is to achieve the policy objectives initially described in a December 2024 memorandum entitled *Draft Policy Objectives for Safe Harbors and Minimum Requirements*. These are reiterated below.

OHNA Compliance Pathways Policy Objectives

1. **Promote inclusive zoning to enable a diversity of housing options** across:
    - Housing Types like ADUs, cottage clusters, quadplexes, and multi-unit homes
    - Housing Characteristics like multi-generational, accessible, and affordable homes of varying tenure types
    - Housing Locations like high opportunity areas in support of mixed income communities
        i. Access to high quality amenities including frequent transit access and community resources like recreation centers with youth and older adult programming, safe streets, parks with playgrounds and fields, and schools
2. **Produce and retrofit homes in high opportunity areas that increase housing choice related to key equity-driven needs:**
    - Affordable housing for low-income, very low-income, and extremely low-income households
        i. With varying characteristics to meet specific community needs like homes with 3+ bedrooms, with multi-generational layouts and units, and that meet the needs of a diverse population
    - Accessible housing for individuals with disabilities and older adults to ensure disability needs are accommodated and age-in place, caretaking, multi-generational living, and other needed services and lifestyles are supported
        i. With characteristics that meet the standards of Type A Units in the state building code for goals of accessibility and the standards of Type B Units in the state building code for goals of adaptability
        ii. With characteristics of different types and sizes of accessible units
    - Anti-displacement policies and policies that address past and current harms including:
        i. Ensuring housing production reflects the needs of historically underserved communities
        ii. Remove barriers to fair housing choice like current zoning or land use policies that perpetuate harm to underserved communities, such as addressing policies prohibiting certain housing types that increase housing choice or current design standards that negatively impact housing production in exclusionary neighborhoods.
3. **Streamline housing development processes** to reduce regulatory barriers, legal uncertainty, or lengthy approval processes for residential or mixed-use applications including by amending hearing or noticing requirements
4. **Increase community capacity and resilience in support of equitable housing** production by increasing efficiency in the provision and maintenance of public facilities; investing in systems that support cooperation across government agencies; incentivizing development patterns that mitigate risk including natural hazards, climate-related disasters, and economic events; and strategically using staff time

Types of Compliance Pathways

DLCD has defined compliance pathways as rules that create required or optional assumptions or actions that Oregon cities must (or may) take to comply with state land use law while completing their Contextualized Housing Need (CHN) analysis and / or their Housing Production Strategy (HPS). DLCD introduced the concept of compliance pathways to the HAWG at the January 28th meeting. It shared the range of compliance pathways (including no action) in this slide.

Figure 1: Types of Potential Compliance Pathways

Compliance Pathway Alternatives	No DLCD Action	Guidance Only	Safe Harbor	Rebuttable Presumption	Minimum Compliance Standards	Regulatory Requirement
Description	DLCD provides no guidance or support for local implementation	Optional guidance; no legal protections to local gov't	Optional implementation path; legal protections to local gov't	Statute/rules sets baseline; local gov't can rebut w/ demonstration	Statute/rules set baseline that constitutes compliance; cities can go above	Statute/rule sets universal requirement; no deviation on that allowed
Previous example Housing Policy	Single-Room Occupancies	Accessory Dwelling Units	Buildable Lands Safe Harbors (OAR 660-024)	SB 1537 Adjustments w/ city-requested exemptions	Middle Housing Administrative Rules	Clear & Objective Standards

When asking ECOnorthwest to conduct research to help it consider which compliance pathways might be most appropriate in the CHN and the HPS, DLCD was focused on **Safe Harbors, Rebuttable Presumptions, Minimum Compliance Standards, and Regulatory Requirements**. These options are considered throughout this memo. The state is already planning on providing guidance documents for how cities are to comply with Goal 10 and Goal 14 in housing and land use planning.

Part 1: Contextualized Housing Needs Compliance Pathways

CHN Research Questions

The state asked ECOnorthwest to explore whether adding pre-approved or required assumptions to the CHN (CHN "compliance pathways") might: (1) result in the selection of actions in local Housing Production Strategies that would lead to housing production that is more aligned with the state's policy objectives, and / or (2) result in better analytical outcomes than a locally driven CHN might. The state was interested in understanding potential unintended negative outcomes and the implications across cities of different sizes or across different regions, and implications of establishing minimum requirements as opposed to safe harbors or other forms of compliance pathways. Specifically, ECO evaluated the following research questions:

- Is it possible for the state to develop a reasonable quantitative assumption that can become the basis for a compliance pathway in the CHN? Are data currently available at a statewide level sufficient / defensible?
- Would a quantitative assumption result in improved outcomes, relative to potential unintended consequences, in zoning or land use policies?
- If it is possible, what might the compliance pathways be for unit mix, accessible housing, unit size / bedroom count, geographic location, and affordable homeownership?

The state wanted to understand these questions across five dimensions of housing need in the CHN:

1. **Unit type mix** (e.g., detached single unit housing, middle housing, multi-unit housing)
2. **Unit sizes** (e.g., studios and 1-bedrooms, 2-3 bedrooms, or 4+ bedrooms)
3. **Geographic location** (i.e., high opportunity areas)
4. **Accessibility** (e.g., Type A and Type B units)
5. **Affordable homeownership**

From the analysis, DLCD sought advice on which assumptions should be added to the CHN requirements and in which mechanism (safe harbors or minimum requirements), and alternative options when no clear path emerged.

CHN Research Approach

For each of the key needs identified above, ECOnorthwest provided analysis, visualizations, and documentation of data limitations, considering how results vary by city size and OHNA region and where results and patterns might be reliable as a basis for policymaking.

In addition, ECOnorthwest conducted a qualitative assessment of potential positive and negative outcomes that could occur (related to the policy objectives and other outcomes as applicable) as a result of setting compliance pathways for quantifying these needs, assuming jurisdictions will work toward these goals whether required or voluntarily. ECOnorthwest considered whether and how outcomes might differ depending on how a compliance pathway is set (e.g., at a high or low end of a range observed in the data).

Unit Type Mix in the CHN

The potential compliance pathway relating to unit mix in the CHN would be **requiring or allowing cities to assume that a certain mix of housing types will meet their community's housing needs.**

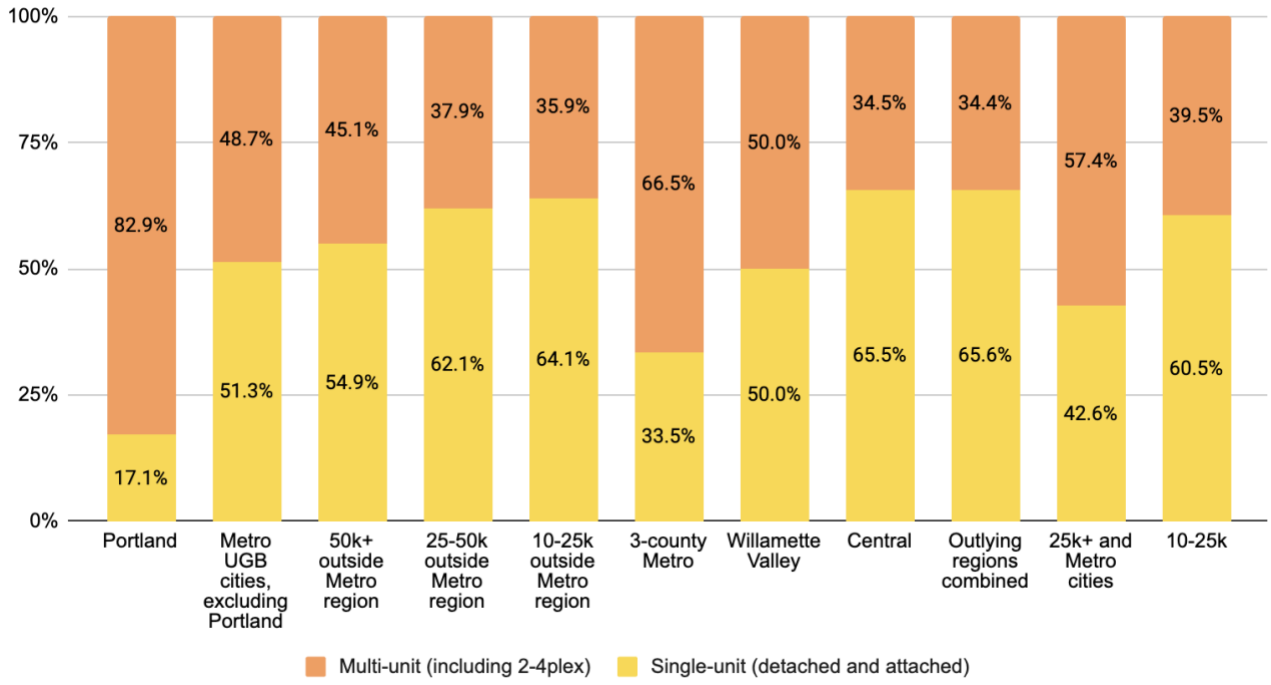
Summary of Key Findings

Data Considerations

- **New housing production unit type mix varies substantially across individual cities, but there are trends at a regional level and by city size.** (Based on SOCDS housing permit data because permitted and produced data by jurisdiction is not consistently available statewide at this time; see Figure 2 for details.)
    - Overall, over 60% of new housing production since 2015 in all regions except the Metro region has been single-unit housing (including single-unit detached and townhouses). In the Metro region only about a third of units have been single-unit in the same period. Excluding the City of Portland, the rest of the cities in the Metro region have produced just over 50% single-unit housing.
    - In aggregate, small cities have a higher share of new units in single-unit structures than large and metro cities (60.5% compared to 42.6%); however, the variation within these size groupings is relatively large.

Figure 2: New Housing Production by Unit Type by Geography

Source: SOCDS



- Current data reliability is poor, especially for smaller cities. In addition, the SOCDS permit data does not differentiate between single-unit detached and townhouses, whereas the housing type groupings consider townhouses to be middle housing. Over time, as cities track housing production by type more consistently and using relevant type definitions, local data will improve.

- **There are clear relationships between housing type and affordability,** with single-unit detached housing less likely to be affordable than other housing types.
  - Most (but not all) regulated affordable housing development has been multi-unit housing, even in smaller cities and outside the Metro region. (Based on data provided by OHCS, see Figure 35 and Figure 36 in CHN Research Appendix for details.)
  - New for-sale housing, which is overwhelmingly single-unit detached, is largely affordable only to households earning over 120% of AMI, with a relatively small percentage affordable at 80-120% of AMI. In aggregate, a larger percentage is affordable at 80-120% of AMI in medium cities than in large and Metro cities, though there is high variability in the data. (Based on analysis of sales transactions from Property Radar for homes built since 2018; see Figure 24, Figure 25, Figure 26, and Figure 27 in CHN Research Appendix for details.)
  - New market-rate multi-unit rental housing spans a wider range of affordability brackets generally from 60-80% AMI to >120% AMI. There are bigger differences in affordability distribution by region and city size, but data are sparse in more remote regions and small

cities making those estimates less reliable. (Based on data from CoStar for new apartments built since 2018; see Figure 28 and Figure 29 in CHN Research Appendix for details.)
    - There is a clear pattern of greater affordability for existing multi-unit and manufactured housing compared to single-unit detached housing. There is some evidence of a similar pattern for newer housing where data is available; however, there is limited data availability for less populous regions for newer housing. (Based on ACS data; see Figure 19 in CHN Research Appendix for details.)
- **Housing type is strongly associated with tenure** due to a variety of factors.
    - On-going challenges with construction defect liability for condominium development make it difficult to produce multi-unit ownership housing.
    - Property management efficiencies for rental housing make it easier to produce and manage multi-unit rental housing compared to single-unit detached rentals. (While build-to-rent models for single-unit detached housing are gaining traction nationally and there is evidence of increasing institutional investment activity in single-unit housing, both represent a very small share of single-unit detached housing.)
    - Correlation between income and tenure[1] (and the relationships between housing type and affordability noted above) mean that higher-income households, who are more likely to be homeowners, are more likely to be able to afford to buy single-unit detached housing if that is their preference.
    - Higher homeownership rates among older households[2] means that younger adults (roughly ages 20-34) are a key driver of demand for rental housing. Housing preferences for younger adults tend to lean towards lower maintenance responsibilities and more access to social activities and amenities, which can align with multi-unit housing.

Policy and Implementation Considerations

- **Needed housing type mix is inherently subjective**, reflecting a mix of preferences, constraints (including affordability and development viability), and policy priorities.
    - Individual household preferences often differ from what they can afford, and they may choose a housing unit that is not their preferred housing type because it offers a location or characteristics that meet their needs at a price point they can afford.
    - Higher-income households generally have greater ability to choose housing that aligns with their preferences than lower-income households because they are less constrained by affordability.
    - If the needed housing mix does not consider market demand for different housing types, it could lead to land use policies that fail to support market-rate housing production.

[1] The median income of homeowners in Oregon is approximately $100,000 a year compared to around $54,000 for renters. (American Community Survey, 2019-2023. Table B25119).

[2] The homeownership rate for households under the age of 35 is approximately 31 percent in Oregon, compared to around 67 percent for those between 35 and 64 and 78 percent for those over the age of 65. (American Community Survey, 2019-2023. Table B25011).

    - There is also a need for housing that the market cannot produce, and determining the needed housing types for non-market housing (i.e., regulated affordable housing) must balance viability of producing the needed units with other considerations about household needs and equity goals.
    - Housing type also has implications for land need / density, energy efficiency, transportation mode choice, and other factors relevant to state and local policy goals.
- **Financing and market challenges inhibit market-rate multi-unit housing production in smaller and more remote communities**.
    - Developer interviews have identified a range of challenges with delivering multi-unit housing in smaller communities, including comparable or higher construction costs compared to larger cities, lower incomes that constrain what people can afford in rent, lack of contractors for specific aspects of construction at a multi-unit scale, challenges securing financing, and limits on the number of new units that can be absorbed (leased) at a time in a small market.
- **Housing type mix matters for the HCA** and establishing land need.
    - Unit type mix is a key assumption for the HCA, which determines land need, and can be subject to litigation when cities propose an urban growth boundary expansion. This makes having certainty about allowable assumptions for housing type mix more valuable to jurisdictions.
    - HCAs in recent years have often estimated needed housing mix based on affordability considerations and the housing types most likely to meet housing needs at different income levels but have generally done this in a qualitative way that includes substantial discussion among policymakers to determine the "right" mix.
    - A safe harbor may appeal to some jurisdictions due to the increased legal certainty, as long as the assumptions seem relatively reasonable to local policymakers. However, a safe harbor that is seen as unreasonable by local policymakers is less likely to be utilized, even if it offers greater legal certainty.
    - Unit mix assumptions affect the calculation of land need. Shifting zoning to better accommodate higher-density housing types could decrease land need if production responds, but if the housing mix that is ultimately built does not align with the needed mix, the jurisdiction may have less than a 20-year supply of buildable land in reality. This could be addressed in the next cycle unless land needs are dramatically underestimated.
- **Linking to OHNA allocations by affordability bracket introduces additional complexity.**
    - A compliance pathway for needed type that is linked to the OHNA allocations by affordability bracket would allow the equity considerations that informed those allocations to carry through to influence housing type mix and help ground the type mix assumptions in how they help deliver housing at the needed range of affordability levels. However, the OHNA allocations by affordability bracket are inherently aspirational and this approach could run the risk of over-emphasizing multi-unit and middle housing.

- Allocations by income brackets vary substantially from region to region but vary less among cities within a region (except for in the Metro region). Combining this variation with variation in unit mix by affordability level could lead to unpredictable results over time.

Implications

- **A quantified compliance pathway could be worthwhile** given the relevance to the HCA, even if data to inform the selected mix(es) are imperfect.
- **Achieving policy goals will require a balance of mandate and flexibility.** A safe harbor would be sufficient to address the desire for legal certainty to support the HCA. However, cities that are not pursuing a UGB expansion (including cities in the Metro region) would not have an incentive to use the safe harbor and might establish a locally determined needed housing mix that would not align with the policy objectives due to political pressure. Differing market conditions in different communities suggest allowing for some flexibility for local determination of needed housing type mix if desired.
- **A quantified compliance pathway will need to draw on a mix of data and policy judgement**. Using the available data to derive a precise needed unit mix is not possible; however, there are patterns and trends that can inform a quantified compliance pathway. There is currently a minimum requirement related to housing mix in the Metro region (the Metropolitan Housing Rule, which requires jurisdictions in the Metro UGB to plan for at least 50% of units to be single-family attached or multi-unit housing) that largely advances housing diversity and efficient land use goals and does not appear to have a specific basis in data. This offers a precedent for establishing a policy-informed compliance pathway related to housing type mix.
- **Assumptions will need to balance a shift towards the policy objectives with practical considerations to avoid unintended consequences.** The policy objectives are clear that the goal is to increase unit type diversity to expand housing options. To do this, the compliance pathway would need to result in a greater emphasis on multi-unit and middle housing relative to recent trends. However, if taken too far, over-emphasizing multi-unit and middle housing in a quantified type mix compliance pathway risks unintended consequences for under-estimating overall land need and misalignment with market demand. This could lead to barriers to overall housing production and/or to meeting needs for housing with characteristics that are correlated with housing type, including tenure and unit size.

Recommendation

Rebuttable Presumption: Jurisdictions must plan for a housing type mix that includes multi-unit and middle housing based on the greater of:

- The minimum percentages specified in the table below based on city size and region
- The share of multi-unit and middle housing permitted and produced over the preceding HPS period

Jurisdictions may justify an alternative percentage based on an evaluation of market and economic factors, affordability by housing type, housing types common for affordable housing production in the jurisdiction or similar communities and changing demographics.

Figure 3: Recommended Housing Type Mix by City Size

Jurisdictions in Metro UGB	50k+ cities outside Metro UGB	10-50k cities outside Metro UGB	<10k cities outside Metro region
≧55% multi-unit & middle housing	≧50% multi-unit & middle housing	≧45% multi-unit & middle housing	≧40% multi-unit & middle housing

"Multi-unit" housing includes single-room occupancies (SROs)

"Middle" housing may include manufactured housing communities.

The recommended percentages above represent roughly a five percentage point increase in multi-unit and middle housing relative to recent trends for the grouping as a whole (rounded up to the nearest 5%). Combined with the requirement to equal or exceed the jurisdiction's own recent trends, this should ensure overall progress towards greater housing diversity over time without pushing so hard for a change that the rules risk creating unintended consequences that could inhibit housing production.

Unit Size in the CHN

The potential compliance pathway relating to unit size in the CHN would be **requiring or allowing cities to assume that a certain unit size (measured as number of bedrooms) will meet their community's housing needs.**

Summary of Key Findings

Data Considerations

- **There is not a gap of housing units for households with 3+ members overall; however, there are fewer options available within rental housing and for lower-income households**.
    - Roughly a third of all households have 3+ members in aggregate in most regions and both medium and large cities. While there is substantial variation at the local level, households with 3+ members represent less than half of households in most cities. (Based on data from the American Community Survey; see Figure 46 and Figure 45 for details.)
    - Renter households are smaller on average than all households. Roughly 25 - 30% of renter households have 3+ members. (Based on data from the American Community Survey; see Figure 47 for details.)
    - More than half of all housing units have 3+ bedroom units in most communities. (Based on data from the American Community Survey; see Figure 40 and Figure 41 for details.)
    - For-rent housing is much more likely to be studio/1 bedroom and 2-bedroom units than for-sale housing, which is largely 3+ bedroom units. (Based on analysis of recently constructed rental housing using data from CoStar and recently constructed for-sale housing using sales transactions from Property Radar; see Figure 51 and Figure 55 for details.)

    - Less than 25% of new for-rent construction has 3+ bedrooms, with limited variation by city size or region, but wide variation by jurisdiction. (Based on analysis of recently constructed rental housing using data from CoStar; see Figure 55 for details.)
    - Where rent data is available, it shows that 3-bedroom units tend to be less affordable than smaller units relative to AMI, even after adjusting for unit size using HUD's methodology. (Based on analysis of recently constructed rental housing using data from CoStar; see Figure 37 for details.)
- Data reliability is poor, especially in smaller cities.

Policy and Implementation Considerations

- **It is challenging for cities to influence bedroom counts through land use actions**. Cities typically do not regulate bedroom count or tenure.
- **Implementing policies that could affect bedroom count may affect or compete with other policy priorities.** Larger units generally have higher rents and sales prices, making them less affordable if they are not within a regulated affordable housing development. However, HPS actions to support more regulated affordable units for families, including providing regulatory flexibility for affordable housing with larger units, could help address a specific need for larger affordable housing units.

Implications

There are large margins of error and variations in measuring the gap between household size and size of units produced. While there is a gap in the availability of larger units for renter households, it doesn't appear large on average, and in some cities may be non-existent. In addition, there is a lack of clarity on how household size should translate to the number of bedrooms as not all households with 3+ people will need 3+ bedrooms. The biggest gap is in larger affordable housing units.

Recommendation

We do not advise the state to develop a quantitative assumption on unit size as a compliance pathway in the CHN. The policy objectives to increase the availability of affordable housing options for families can be met through HPS actions regardless of how need is quantified. If the state were to develop a compliance pathway for bedroom count assumptions in the CHN, we suggest a **safe harbor based on local or regional data**—for example, a safe harbor that the city may base need for multi-unit rental units with 3+ bedrooms on the share of renter with three or more household members in the city or region (whichever is greater), based on the latest available 5-year data from the American Community Survey.

Geographic Location in the CHN

One intended outcome of the CHN is to help jurisdictions identify the types, characteristics, and **locations** of housing need. The policy objectives focus on increasing housing choice in "high opportunity" areas, and this

is the aspect of location that the state asked ECOnorthwest to evaluate further. A compliance pathway related to high-opportunity locations could address two factors:

- How high-opportunity areas are defined and identified
- Defining and identifying the housing types and/or characteristics needed in high-opportunity areas, such as establishing a certain share of specific housing needs that need to be met within high-opportunity areas

ECOnorthwest has been supporting DLCD in mapping a variety of assets and harms to inform an approach to identification of "high opportunity areas" in a parallel technical effort.[3] That technical effort is ongoing and will continue to evolve. This analysis primarily focuses on how housing types and/or characteristics overlay with high-opportunity areas as they are tentatively identified through that on-going work—areas with a high number of assets and a low number of harms from a list of 21 indicators.

Key Findings

OPPORTUNITY AREA DEFINITION:

- **There are limitations to the data that is available statewide to identify both assets and harms**, as further documented in the methodology for the draft Opportunity Mapping Tool. Some datasets are not available statewide (e.g., presence of sidewalks, locations of farmers markets); others may have less detail or be less complete, nuanced, or up to date than comparable local data (e.g., parks, transit service).
- **Local efforts to define and map high-opportunity areas could be highly variable** in terms of alignment with the state's policy objectives without further guidance or rulemaking. Some jurisdictions may have better data available locally than the state has access to at a statewide level; others may not. Equitable local engagement is a critical component of establishing appropriate locations as high-opportunity areas, but local engagement efforts may also be subject to inequitable pressure by local residents and elected officials to avoid certain areas.
- **The current methodology may not consistently identify desirable places to live as high-opportunity areas.** (Based on a review of preliminary results in the Opportunity Mapping Tool and existing rule language.)
    - Based on the way and the analysis is constructed at this stage, many cities show a pattern with high assets in the center or downtown area, but often also high harms; high-asset, low-

[3] At the time of this analysis, ECOnorthwest was concurrently working with DLCD to create a methodology to define areas of high opportunity and build an opportunity mapping tool. To evaluate location, we overlaid the draft Opportunity Mapping scores as of late May 2025 to inform this analysis. However, the Opportunity Mapping methodology is still in draft format, and is likely to change. It is intended to help identify where in jurisdictions there is proximity or exposure to relatively more or less community assets and harms. The outcome of the tool will be a map that gives an overall combined score for a geographic area that takes into account both the assets and harms included in the map. The draft methodology includes 11 indicators representing community assets, 10 indicators representing community harms, and three screening layers that can be overlaid for additional context, but do not influence the aggregated scoring.

harm areas in some close-in neighborhoods; and low-asset areas around the periphery, some of which have low-harm and some with high-harm.
    - The current definition of assets and the draft approach to opportunity mapping includes proximity to many assets that are typically limited to major corridors and nonresidential areas, such as grocery stores, medical facilities, major employers, and transit. It also includes assets that are commonly allowed and found in residential areas such as trees, schools, and parks, but because all assets are equally weighted, areas with these assets but less proximity to commercial areas and major corridors are less likely to be identified as high-asset areas.
    - Because the methodology does not consider demographic factors (e.g., income or concentration of poverty) or home values as indicators, some high-income residential areas are categorized as low-asset and/or high-harm due to lack of access to commercial areas and transit and/or exposure to harms such as higher wildfire risk due to proximity to large wooded areas or landslide hazard due to being located on a hillside. This is an intentional choice but could lead to discrepancies between how areas are perceived by the public and how they are categorized in the analysis.
    - Not all potential assets and harms or (or could be) mapped and included in the analysis. Factors such as busy arterial roads, exposure to property or violent crime, and school ratings are not included in the definition of assets and harms or in the mapping analysis to date but can impact popular perception of neighborhood desirability.
- **Mapping existing assets will typically miss areas that may be concept planned or master planned to become complete, high-opportunity areas in the future** but where key features are not present today. Focusing production of multi-unit and affordable housing in high-opportunity areas as currently identified could mean less pressure on (or even inadvertently discouraging) jurisdictions to expand housing options in existing single-unit detached neighborhoods or to integrate a range of housing options into newly developing areas unless combined with other locational considerations.
- **Not all assets or harms are equally meaningful in all communities.** The working draft of the Opportunity Mapping Tool does not currently include the ability to differentially weight indicators or to add or remove indicators based on their local relevance, though scoring can be calculated relative to the UGB, which will tend to limit the impact of indicators that do not vary much within a city.
- **The current definition of opportunity areas is partially but not fully aligned with the location preferences in the ORCA.** OHCS is considering updating those preferences and the discrepancies may be resolved through that process and/or future refinements to how opportunity mapping is defined. Sending mixed or conflicting signals to affordable housing developers could result in additional challenges with affordable housing production.
- **The state still has much work to do to finalize the opportunity area analysis** as well as complete related analyses and demonstrate how these other analyses will interact with the opportunity areas. These include:
    - The DLCD Community Explorer Tool
    - The OHCS Oregon Centralized Application (ORCA) location priorities for affordable housing development funding

- Related analyses of racially and ethnically concentrated areas of affluence and poverty (R/ECAAs and R/ECAPs)
- The Environmental Justice Mapping Tool which will not be complete until the end of 2027.
- Interaction between opportunity area mapping with the HPS rules, the Climate Friendly Areas rules, and the Buildable Land Inventory rules

LOCATION OF NEW HOUSING RELATIVE TO HIGH- AND LOW-ASSET AREAS AND HIGH- AND LOW-HARM AREAS:

- **New for-sale units are mostly in low harm areas**, and most are located in low asset, low harm areas compared to high asset, low harm areas. (Based on analysis of sales transactions for recent construction from Property Radar; see Figure 56 for details.)
- **Market rate rentals are mostly in high asset areas** with an even split between high asset, low harm and high asset, high harm areas. Market rate rentals located in "high harm" areas are mostly adjacent to busy commercial corridors. (Based on analysis of recent multi-unit rental housing construction from CoStar; see Figure 57 for details.)
- **Recent affordable housing projects are largely located in high asset area**s, with more in high asset, low harm areas. (Based on analysis of recently funded affordable housing project locations provided by OHCS; see Figure 58 for details.)
- In general, opportunity areas (as currently mapped) align with where the market is driving production for multi-unit housing, less so for for-sale housing. Since most of these areas are in historic centers of cities and along highways, some also have a high concentration of harms (toxic cleanup sites, bike & ped-involved crashes) that can't be easily removed.
- To the extent that identified high-opportunity areas overlap with areas with existing high-value development, concentrating zoning reforms and incentives in these areas may have less impact due to the challenges of redeveloping high-value existing property.

Implications

- Current opportunity area mapping is still preliminary and may not provide an appropriate benchmark for setting quantitative percentages of units to be located in high-opportunity areas.
- Despite best efforts, a statewide map may not accurately identify high-opportunity areas in ways that align with the policy objectives in all communities. However, local efforts to define and map high-opportunity areas may or may not better align with the policy objectives absent further direction.
- Without a compliance pathway related to how high-opportunity areas must be defined and mapped, quantitative definitions of need for specific types of units in those areas will have little meaning and impact.

Recommendation

OPPORTUNITY AREA DEFINITION

Provide a mix of guidance and additional requirements for how high-opportunity areas must be identified locally.

Because of the inherent limitations of a statewide mapping effort, **the final version of the statewide opportunity mapping tool may be best suited as a resource for jurisdictions** along with guidance documents detailing how it could be applied locally, and potentially adjusted or adapted (e.g., through weighting of the indicators) to reflect equitable engagement for jurisdictions that lack the capacity or data to do their own mapping.

Additional guidance that would also be highly valuable for practitioners with limited experience with such data could include:

- Information on relevant and readily available data sets and their strengths and limitations.
- Appropriate ways to measure proximity to different assets and harms given the geographic reach of their impact and the type of asset or harm.
- Appropriate geographic scales for the analysis (e.g., parcel, grid, or specific census geographies)

Because of the importance of defining areas of opportunity for achieving the state's policy objectives, it may also be appropriate to establish additional rules that lay out more detailed requirements for local opportunity mapping efforts, such as:

- Further defining the key assets and harms that must be considered in establishing high-opportunity areas, building on or refining the definition of "Location" in the OHNA rules (OAR 600-008-0005(27)) and its embedded definition of "Key destinations" from the DLCD Transportation Planning rules (OAR 660-012-0360(2)).[4]
- Clarifying how jurisdictions may weigh the importance of different assets and harms based on local conditions and equitable engagement
- Clarifying how urbanizable areas or planned development areas that are expected to become complete communities when developed should be addressed
- Clarifying whether to integrate, overlay, or separately address areas that are segregated by race and income (e.g., R/ECAPs and R/ECAAs), and/or market indicators of exclusivity (e.g., current home prices, presence or absence of recent housing production) when identifying areas of opportunity
- Clarifying how assets should be weighed against harms (e.g., are high-asset areas considered high-opportunity even if they also have relatively high exposure to harms?).
- Requiring that jurisdictions demonstrate how the identified high-opportunity areas reflect and align with input received from equitable engagement

These requirements could establish a somewhat clearer and more detailed framework for the identification of high-opportunity areas than exists under current rules, while deferring details of data sources and methods to guidance.

[4] Note that "Key destinations as defined by OAR 660-012-0360(2)" includes major facilities that may have substantial pedestrian, bike, or transit activity but do not necessarily benefit the adjacent residents, including major sports or performance venues and colleges. These assets are not included in the current opportunity mapping but might be included in local analyses under current rule language.

Establishing Specific Needs to Meet within Opportunity Areas

Because it would be premature to use the available data to establish quantitative rules for a specific share of certain housing needs to be met within opportunity areas given the preliminary nature of statewide mapping results, it may be more appropriate to establish compliance pathways that require a qualitative or relative definition of need relative to location. For example, for key needs such as affordable housing, accessible units, and affordable homeownership, the rules could more explicitly require that jurisdictions define a need for an increasing share of these housing needs to be met within high-opportunity areas, and/or for these housing options to be equitably distributed relative to high-opportunity areas (e.g., that there should be equal or greater availability of housing that meets those needs within high-opportunity areas compared to the distribution of the overall housing stock).

Accessible Units in the CHN

The potential compliance pathway relating to accessible housing in the CHN would be **requiring or allowing cities to assume that a specific share of housing should meet specific accessibility standards to meet their community's housing needs.**

There are several relevant building code standards related to accessibility, including:

- **Type A** units are required to have certain features for wheelchair access, including accessible entrances and doorways, maneuvering clearances, and must have certain features that can be modified or added based on the tenants' needs—such as reinforced walls for adding grab bars in bathrooms. For multi-unit developments with more than 20 units, the building code requires at least 2% (but not less than one dwelling unit) to be designed as Type A units.
- **Type B** units are considered "adaptable," in that they are usable by a person in a wheelchair but are not fully wheelchair friendly. For example, interior doors must allow clear widths for wheelchair access, but only the front door is required to meet the higher accessibility/maneuvering requirements. Other adaptability features must also be included. Multi-unit developments with four or more units are subject to standards requiring Type B units. For buildings with an elevator (typically 4+ story buildings), all units must be Type B units, per the building code; for those without an elevator, all ground floor units must be Type B. (Note that multi-level units such as townhouses are excluded from these requirements.)

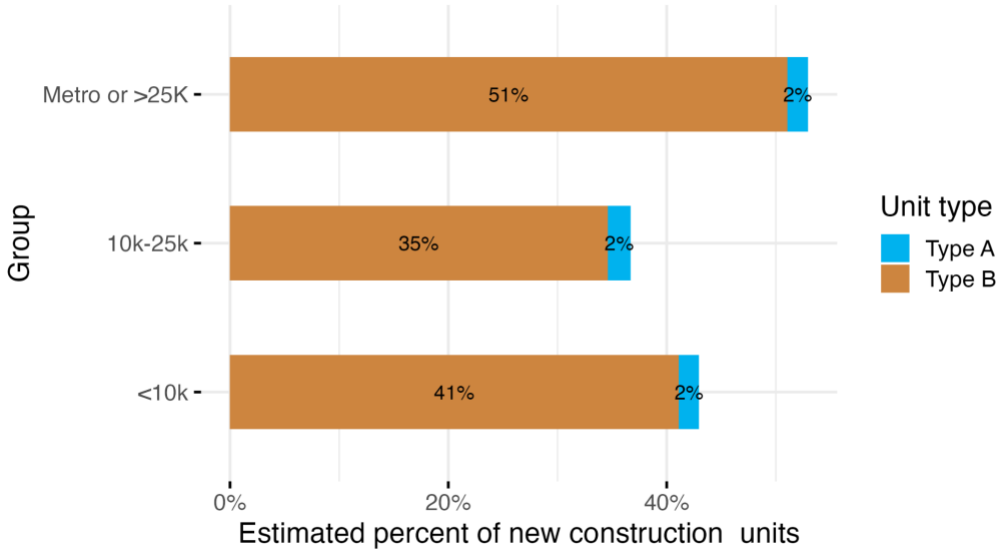
Summary of Key Findings

Data Considerations

- The best available data to estimate need for accessible units is the share of the population with ambulatory disabilities. There are many other types of disabilities (e.g., sensory disabilities) that may require or benefit from specific housing features, but not necessarily the same features as those needed for individuals with ambulatory disabilities.

- **Roughly 3-13% of the population has ambulatory disabilities in Medium and Large cities across Oregon**, though most fall between 5 and 10%. The overall share at a regional scale ranges from just over 4% to just under 8%. (Based on an analysis of ACS data.)
- The prevalence of ambulatory disabilities is higher:
    - Among older people, especially those 75 and up (statewide, less than 6% of adults ages 18-55 have an ambulatory disability, compared to over 30% of those over age 75)
    - Among lower-income households
    - In Medium cities (compared to Large and Metro cities)
    - In cities outside the Metro region
- The population is aging in many Oregon cities, which is likely to increase the share of the population with ambulatory disabilities over time.
- There is no comprehensive or reliable data on prevalence of Type A and B units at the state or local level. To reach a rough approximation of units that have likely been built to Type A or Type B standards, ECOnorthwest analyzed available data on recent multi-unit developments including number of stories, presence of elevators, and number of housing units. This data is incomplete and not entirely reliable.
- Type A and B units are required for certain types of housing under existing building codes and federal requirements:
    - Multi-unit structures with 4+ units (excluding townhouses) must design ground floor units and upper floor units served with elevators to Type B (adaptable) standards
    - Multi-unit structures with 20+ units must design 2% of units to Type A (accessible) standards
    - Affordable housing that receives federal funding is subject to additional requirements that at least 5% of units must be accessible for people with physical or mobility disabilities and 2% must be accessible for people with vision or hearing disabilities.
    - Other types of housing may voluntarily include accessibility / universal design features, but it is not required.
- **Close to 50% of all recently built multi-unit housing units may have been designed to Type B standards, and roughly 2% of units may have been built to Type A standards**, though this varies by city size and region as shown in Figure 4.
    - The higher prevalence of Type B adaptable units in larger cities likely reflects the greater share of multi-unit housing with elevators in those areas. This contrasts with the lower share of the population with disabilities living in larger cities and the Metro region.
    - Senior-specific housing was excluded from the analysis but likely includes a higher share of accessible / adaptable units than other multi-unit housing.
    - The higher requirements for affordable housing are not reflected in this analysis.

Figure 4: Share of New Construction of Type A and B Housing by City Size
Source: CoStar



Policy and Implementation Considerations

- Many seniors prefer to age in place, which may mean continuing to live in existing single-unit detached housing retrofitted to meet their needs.[5] If and when they do relocate, many older adults indicate they would still prefer a single-unit detached home or active adult or senior housing.[6]

- **Increasing the share of accessible and adaptable units in new market-rate apartments may not meet the most pressing needs for accessible housing.** Market-rate apartments predominately serve younger adults, who have a lower rate of ambulatory disabilities than older adults. Individuals with disabilities are over-represented in lower-income households, but new market-rate apartments may not be affordable for those households. New market-rate apartments also tend to be less financially feasible in smaller cities and outlying areas, making that a challenging way to increase the supply of accessible units in those areas.

Implications

- Shortages of accessible and adaptable units are likely most prevalent for:
    - Single-unit detached, cottage clusters, duplexes, and townhouses that are adaptable to changing ability levels as occupants age
    - Housing that is both accessible and affordable to those with lower incomes

[5] Maggie Ratnayake, et. al., "Aging in Place:: Are We Prepared?," *Delaware Journal of Public Health* 8, no. 3 (2022): 28-31, https://pmc.ncbi.nlm.nih.gov/articles/PMC9495472/.
[6] Binette, Joanne, and Fanni Farago. *2024 Home & Community Preferences Among Adults 18 and Older*. Washington, DC: AARP Research, December 2024. https://doi.org/10.26419/res.00831.001

    - Housing offering greater degrees of accessibility for those using wheelchairs (housing built to Type A accessibility standards and adapted for individuals with wheelchairs or housing built to higher levels of accessibility)
    - Housing that meets the needs of those with sensory disabilities (this is only required within federally funded affordable housing)
    - Accessible and adaptable housing in smaller cities and outlying regions where rates of ambulatory disabilities are higher, there are fewer new multi-unit developments, and elevator-served buildings are less common.
- **Increasing accessibility of the existing single-unit detached housing stock and supporting development of accessible senior housing may best meet the needs of seniors with mobility disabilities**.
- Need for accessible and adaptable units is likely to grow over time as the population ages.

Recommendation

It may be helpful for the state to provide guidance or a safe harbor to assist cities with making reasonable estimates of the need for accessible housing, given that local planners may have limited experience planning for accessible housing and there is limited reliable data. For example, a safe harbor could be to estimate the need for accessible units as a percentage of units based on the share of the population with ambulatory disabilities in the City or region (whichever is higher).

- The state could consider adding a small margin (e.g., 1-2 percentage points) to the current share to account for aging trends.
- Given the importance of retrofitting existing homes as well as producing new accessible units (including within senior-specific housing) to meet the needs of a range of individuals with disabilities, a CHN compliance pathway related to accessibility should be framed broadly enough to encompass all of these needs and options (e.g., articulating the need as units built or retrofitted to meet the needs of people with mobility disabilities rather than specifying Type A or B units).

Additional guidance may also be helpful for local planners to incorporate accessibility considerations into the CHN, including information on:

- Existing requirements related to Type A and B units
- housing features that meet the needs of individuals with sensory disabilities
- Universal Design practices that can apply to a range of housing types and benefit a range of users
- How to collect data on Type A and B units and/or other accessibility features for new or existing housing

Affordable Homeownership in the CHN

The potential compliance pathway relating to affordable homeownership in the CHN would be **requiring or allowing cities to assume that a certain share of housing should be affordable homeownership to meet their community's housing needs.**

Summary of Key Findings

Data Considerations

- Existing homeownership rates vary by income level. Statewide, the homeownership rate for households under 30% HAMFI is well below that of moderate- and higher-income households. The gaps between the homeownership rates at each income level are generally just under 10 percentage points each, with a bigger jump for households over 100% of HAMFI. (Based analysis of HUD's Comprehensive Housing Affordability Strategy (CHAS) data which relies on 2017-2021 ACS 5-Year estimates.)

Figure 5: Homeownership Rate by Income

Source: CHAS

Income Bracket	Homeownership Rate
>100% HAMFI	73.0%
80-100% HAMFI	53.4%
50-80% HAMFI	45.5%
30-50% HAMFI	36.4%
<30% HAMFI	27.5%
Total	**56.2%**

- Existing homeownership rates by income vary between communities, particularly within the Metro region, but there are not clear patterns of differences based on region or city size.
- Overall homeownership rates vary somewhat by region, with less variation by city size.
- There is very little for-sale housing affordable to lower-income households, especially within newer housing stock. (Based on analysis of 2023 PUMS 5-year data for the state as a whole.)

Policy and Implementation Considerations

- **Identifying true "need" for affordable home ownership is challenging.** Lower income households are far more likely to be renters than higher-income households, but there is no available data on how many of those households would prefer to be homeowners.
    - One way to think about this is through revealed preferences: we can observe the patterns of those who are less income constrained (above 120% of AMI) and assume that lower- and middle-income households "need" access to home ownership product at similarly high rates. However, this assumes that lower-income households share the same preferences and priorities as higher-income households, which may not necessarily be the case.
- **Tenure and unit type are tightly interwoven**. There will be interaction (whether explicitly recognized in a compliance pathway or not) with any unit mix compliance pathway that is implemented.

    - Statewide, just **12% of newer single-unit detached ownership housing** is affordable to households below 100% of AMI, while **59% of new middle housing** units were affordable to households below 100% of AMI.
    - As noted previously, construction defect liability challenges inhibit development of multi-unit ownership housing that could (in some cases) offer a more affordable form of homeownership.
- **Maintaining homeownership can also be challenging for low-income households.** Lower-income households generally have less savings and a smaller buffer between essential expenses and income than higher-income households. Low-income homeowners may struggle to cover unexpected costs for maintenance or repairs while continuing to pay their mortgage and other expenses, which can lead to deteriorating housing conditions or need to take on additional debt.
- The existing rules already identify housing tenure and wealth-building opportunities as a fair housing issue area that must be addressed in the CHN.

Implications

There is no clear, data-informed way to establish an optimal rate of homeownership for low-income households. While increasing the rate of homeownership for low-income households is important and aligned with the Policy Objectives, being overly ambitious about the degree of increase could result in conflicts with other policy goals.

Recommendation

If the state wishes to establish a compliance pathway to more explicitly require cities to identify a need for affordable homeownership opportunities and/or to quantify this need, it may be appropriate to simply state more explicitly that this need that must be addressed in the CHN. If the state wishes to establish a compliance pathway to quantify this need, the best available option may be to provide a safe harbor that cities may estimate the need based on increasing homeownership rates for low- and moderate-income households by at least a specified increment (e.g., 5 or 10 percentage points) relative to current homeownership rates. This increment would approximately shift a given income group up to a similar level of homeownership as the next higher income group has today. Such a goal would still require substantial effort and funding to achieve but would be less likely to result in unintended consequences of jurisdictions understanding the need to be so dramatically higher that they might take actions that become counterproductive.

Part 2: Housing Production Strategies Compliance Pathways

HPS Research Questions

The state is interested in exploring compliance pathways for action selection in the HPS that encourage or require cities to take land use actions that will support the policy objectives. To inform potential rulemaking, the state asked ECOnorthwest to consider the following research questions:

- What zoning or land use actions (reforms or incentives) would support the Policy Objectives with the fewest unintended consequences?
- Are there particular thresholds at which those reforms or incentives are effective or result in unintended consequences?
- How might this vary by region and/or city size?
- What compliance pathways are most likely to reduce the likelihood that zoning and land use are barriers to development that meets key housing needs?

ECOnorthwest focused on the following elements of the policy objectives for this evaluation:

- Inclusive Zoning Policies to enable a diversity of housing types, including multi-unit and middle housing, overall and in high-opportunity areas
- Affordable Housing Production and Housing Choice in high-opportunity areas
- Accessible Unit Production and Housing Choice in high-opportunity areas
- Affordable homeownership in high-opportunity areas
- Provide different types and sizes of affordable housing units

HPS Analysis Approach

Process and Elements of Analysis

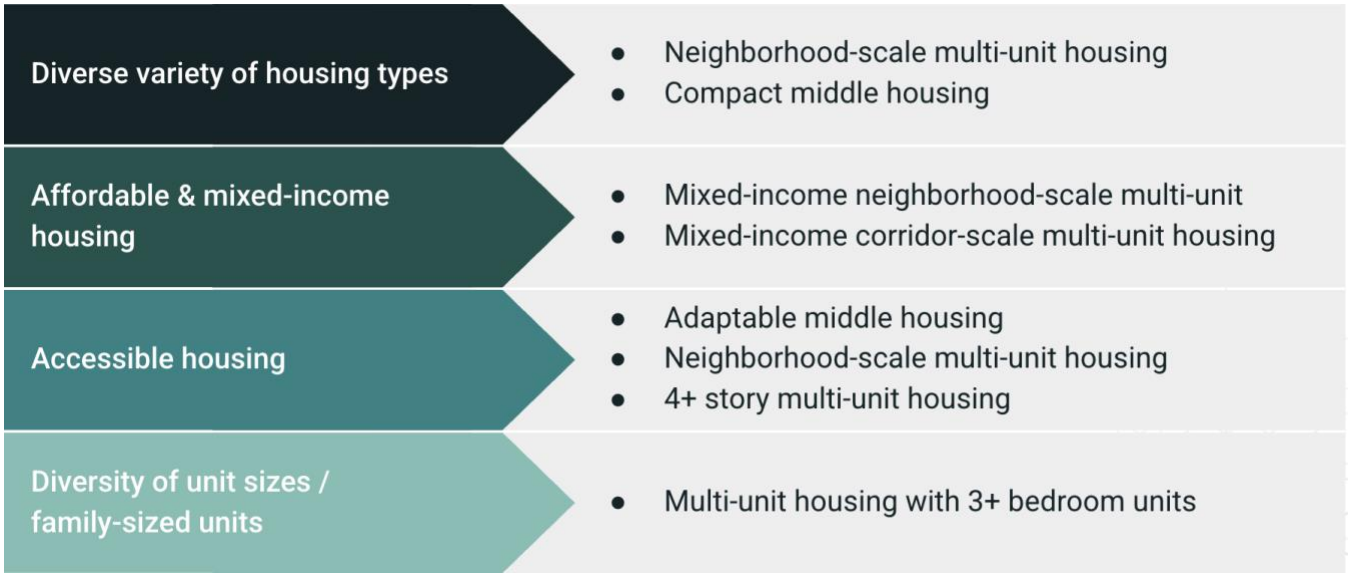
To respond to these questions, ECOnorthwest carried out a four-step research process.

1. **Defining Prototypes**: What types of housing development could support the Policy Objectives?
2. **Feasibility Analysis**: Where are those types of development plausibly feasible for the market to deliver (in an optimistic scenario), based on a pro forma analysis?
    a. How does this relate to preliminary mapping of high-opportunity areas?
    b. How does this vary by City size and region?
3. **Zoning Analysis**: In select jurisdictions with readily available data, where are those types of development currently allowed?
4. **Land Use Actions**: What does this suggest about HPS land use actions that could expand opportunities for development that would support the Policy Objectives?

Development Prototypes

The types of development selected for analysis based on their potential to support the state's policy objectives are summarized in brief below. Additional details about these prototypes are provided in the data appendix beginning on page 113.

Figure 6: Development Prototypes



- Neighborhood-scale multi-unit housing: 3-story multi-unit development on small lots with roughly 8-12 units and little or no parking and open space.
- Compact middle housing: middle housing types on smaller lots with less parking and open space / landscaping compared to current minimum compliance standards under middle housing rules.
- Adaptable middle housing: single-story cottages and stacked quad- and six-plexes that offer potential for adaptable units.
- 4+ story multi-unit housing (also referred to as corridor-scale multi-unit housing): multi-unit housing on larger sites with 4 or more stories and at least 40 units, likely providing elevator service and more adaptable and accessible units.
- Mixed-income variations of multi-unit housing assume 20% of units at 80% of AMI.
- Variations with 3+ bedroom units assume a higher proportion of units with 3+ bedrooms compared to current statewide averages for multi-unit housing.

Interpretation of Results

The results provide a rough indicator of where and to what extent market-rate developers might respond to various inclusive land use policies, supporting development that aligns with the state's policy objectives. Specifically, block group-based market feasibility results can help discern which prototypes could be feasible under favorable market conditions and therefore which land use actions could have an impact on market-rate housing development.

The analysis results are indicative of the land use actions that could be productive in different size cities should market conditions improve, helping to distinguish between the following:

- Policy actions that could enable prototypes that are likely infeasible everywhere
- Policy actions that could enable prototypes that are likely infeasible in many places, including medium cities, but might be closer to being feasible in large and Metro cities and/or high opportunity areas in some of those cities
- Policy actions that could enable prototypes that are likely infeasible in many places, but might be closer to being feasible in medium, large, and Metro cities and/or high opportunity areas in some of those cities

The analysis results do NOT describe the scope or scale of actual feasible development in any city or submarket.

Summary of Key Findings

Analysis Results

- **Under current market conditions, most housing development shows limited financial feasibility in nearly all Oregon submarkets.** As a result, the balance of the analysis focused on housing development feasibility under more favorable hypothetical conditions, given the extended time horizon over which land use actions and development could take effect.
- Under more favorable market conditions, **feasibility varies between Large and Metro Cities compared to Medium Cities**.
    - Smaller prototypes showed potential feasibility across more submarkets than larger prototypes.
    - If a particular prototype showed potential feasibility under favorable conditions in Medium Cities, it would generally be feasible in more of the Large and Metro Cities.
    - If a particular prototype showed potential feasibility under favorable conditions in Large and Metro Cities, the City of Portland would consistently be among the cities that showed the most feasible submarkets.
    - Larger multi-unit prototypes (50+ units) showed relatively little feasibility under favorable conditions outside of the City of Portland.
- The most promising types of development that could align with the policy objectives include:
    - **Diverse variety of housing types:** Expanding opportunities for more compact detached middle housing in Medium Cities and for neighborhood-scale multi-unit housing in Large and Metro Cities could potentially result in feasible development that supports a more diverse range of housing types.
    - **Affordable & mixed-income housing:** There may be potential to use neighborhood-scale multi-unit housing as a regulatory incentive / density bonus for mixed-income housing in Large and Metro Cities. Mixed-income housing height / density bonuses are less likely to be

effective as incentives for mixed-income development where typical 3-story multi-unit housing is already allowed, even in Large and Metro Cities without further financial incentives.
    - **Accessible housing:** Incentivizing adaptable detached middle housing has potential for feasibility across jurisdiction sizes. Expanding opportunities for neighborhood-scale multi-unit housing and 4+ story corridor-scale multi-unit housing in Large and Metro Cities could potentially result in feasible development that supports more accessible housing units based on current building code requirements (this is much less likely to be effective in Medium Cities).
    - **Diversity of unit sizes / family-sized units**: There may be potential to use neighborhood-scale multi-unit housing as a regulatory incentive / density bonus for including a higher share of 3+ bedroom units in Large and Metro Cities. There may be more limited potential to use 4+ story corridor-scale multi-unit housing as a regulatory incentive / density bonus for including a higher share of 3+ bedroom units in Large and Metro Cities in areas where typical 3-story multi-unit housing is already allowed.
- In Large and Metro Cities, feasibility results were generally similar within the preliminary identified high-asset, low-harm areas and citywide, *assuming equal availability of suitable sites in both areas*. (Lack of a statewide parcel dataset precluded ECOnorthwest from analyzing actual site conditions at a statewide scale.)
- A zoning scan of four jurisdictions found that relatively few of the housing prototypes that could help address Policy Objectives were allowed by zoning across a substantial portion of the cities' land area.
    - In the two Large and Metro Cities analyzed, there were limited areas (largely commercial/mixed-use zones) zoned to allow higher-intensity multi-unit housing, and limited areas (generally medium/high density residential zones) that allow compact middle housing (as specified in this analysis), neighborhood-scale multi-unit housing, or six-plexes.
    - In the two Small / Medium Cities analyzed, the forms of middle housing and multi-unit housing that could achieve the policy objectives (as specified in this analysis) were allowed almost nowhere within the cities.

The analysis results suggest that r**elaxing zoning constraints on multi-unit and middle housing with specific characteristics could expand housing development options** in ways that align with the policy objectives, though **zoning reforms alone may be insufficient to result in meaningful production of these needed housing options in many parts of Oregon**, particularly in smaller cities.

Policy and Implementation Considerations

Effectiveness of Land Use Actions

- Zoning is one of the key levers that cities control that impacts housing production. **There is generally little harm in removing regulatory barriers to needed housing development**, even if there is not a clear precedent for market-feasible development of that type available in the area. However, past a certain point, **excessive up-zoning could create unintended consequences**.

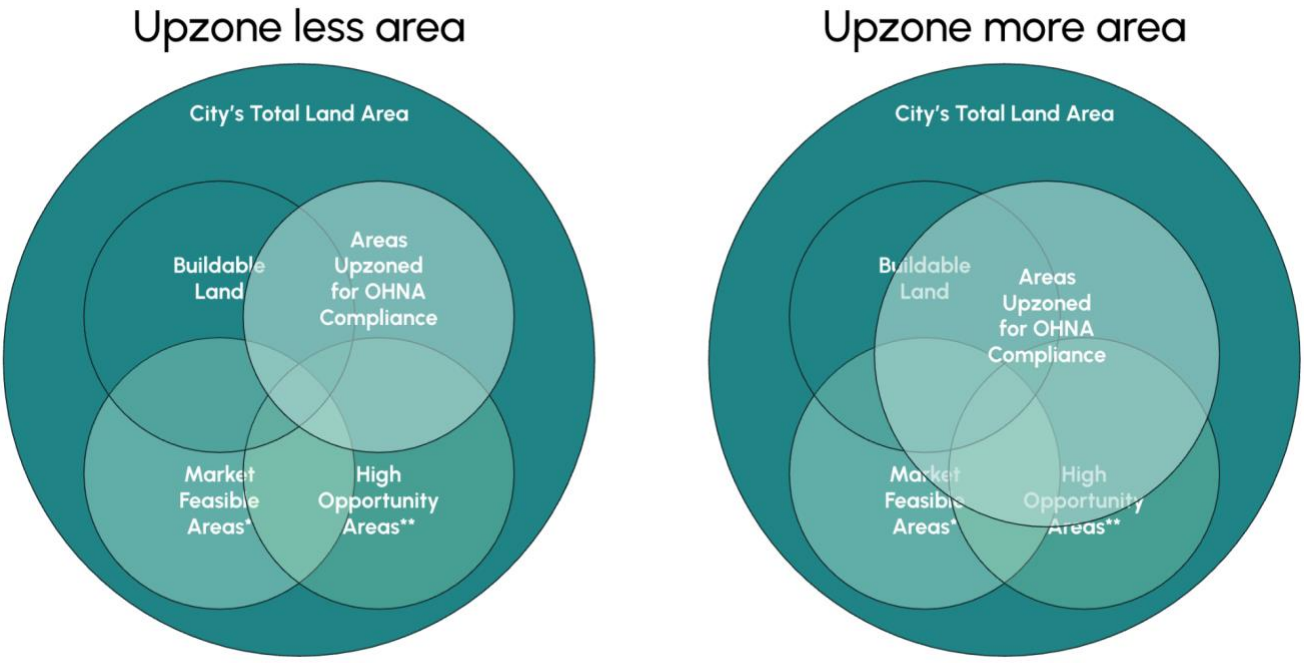
    - If zoning regulations allow far more development than is market-feasible within the foreseeable future, this could inflate property owner expectations about development potential and land value, making them less likely to sell their land to developers building below what is allowed.
    - HCA rules and policy guidance should be reviewed to ensure they sufficiently address quantifiable validation and avoid unintended preclusion of UGB expansions resulting from widespread upzoning. Any widespread upzoning compliance measures should be accompanied by HCA rules and guidance that avoid overcounting speculative capacity.

- For Medium Cities, **land use actions that enable a broader range of small-scale housing development options are more likely to align with what can be financed and built in smaller markets**. While the feasibility results showed little development potential, small-scale local developers and investors may be willing to build small projects that do not meet feasibility criteria for larger developers and more competitive markets.
- While zoning reforms have a relatively low cost for jurisdictions (primarily staff time and potentially consultant support to develop new regulations and provide information and public engagement related to the changes), they can be politically challenging. **Cities are less likely to implement land use actions that impact development options in existing neighborhoods if there are other options available under the rules**, especially in communities where prevailing local sentiment does not align with the policy direction.
- The current state of zoning regulations for housing, especially multi-unit housing, is highly variable even among cities in the same region or of a similar size. **The impact of any zoning reforms will depend on how restrictive applicable regulations are today** in a given community. Allowing jurisdictions to demonstrate that their existing zoning is already at least as permissive as any given zoning standards will create flexibility for cities that have already made substantial progress in removing regulatory barriers to needed housing options.
- Non-regulatory barriers to production of needed housing options (e.g., market conditions, financing and access to capital) may remain in jurisdictions where zoning is already aligned to allow specific development. In these situations, other actions may have greater impact than further zoning reforms. **Providing flexibility for jurisdictions to focus on other actions if they can show that their zoning is already comparable to what is required can support effective action to address remaining barriers**.

Spatial Considerations

- Given the uncertainty about site conditions and current zoning in high-opportunity areas, **a broader geographic approach is more likely to create overlap between supportive market conditions, viable sites, and inclusive zoning,** as illustrated below.

Figure 7: OHNA HPS Compliance Design Considerations



Notes: (*) Market-feasible areas have not been defined
(**) Interacts with definitions of high opportunity areas and their CPs in the CHN

- In Medium Cities, spatial differences between high-opportunity and lower-opportunity areas may be less dramatic due to their smaller geographic extent, and state-provided opportunity mapping may be less reliable due to data limitations, making it **less effective to focus zoning reforms specifically on high-opportunity areas in smaller cities**.
- Development on vacant / partially vacant land (particularly development-ready land) is more likely to be feasible than redevelopment given similar market conditions, particularly in smaller cities and those with weaker market conditions. However, some vacant and partially vacant land has challenging site conditions that have prevented it from developing to date. This is less likely for development-ready land, but that may be in short supply in some cities, especially in the first round of developing an HPS under the new rules. **Applying zoning reforms to a mix of buildable land, development-ready land, and developed land where redevelopment may be possible can maximize potential for feasible development.**
- Allowing or requiring cities to choose specific areas to implement zoning reforms creates the potential for tailoring implementation to local context. However, experience implementing middle housing legislation suggests **if cities choose where to apply zoning reforms within existing neighborhoods this can create substantial political pressure to avoid certain neighborhoods**.
- Integrating a range of housing options into future neighborhoods may be equally important as retrofitting existing neighborhoods to provide a wider range of housing choices. **If reforms focus only on current high-opportunity areas, they will miss opportunities to create more inclusive future neighborhoods**.

- **Further expanding housing allowances in commercial zones could have unintended consequences**. Ability to require ground-floor commercial or limit residential uses in some commercial zones can be essential to meeting economic development goals, maintaining vibrant downtowns, and protecting opportunities for future walkable commercial development in concept planned greenfield areas. In addition, allowing cities to meet needs for higher-intensity housing only or primarily within commercial areas may or may not expand housing choice.

OHNA HPS Compliance Pathway Concepts

The concepts below generally pair a minimum requirement to take one or more actions in the HPS to address a given housing need with a safe harbor that establishes one or more land use actions cities can take that would be considered sufficient to meet that minimum requirement (alone, or in combination with at least one other action of the jurisdiction's choosing). While a safe harbor in the HPS likely offers less incentive than a safe harbor applicable to the HCA or relevant to a UGB expansion context, because this analysis (in combination with the CHN analysis) identified relatively few land use actions that could be effective in meeting the identified needs, making these actions minimum requirements or even rebuttable presumptions would result in a highly prescriptive approach. If the state prefers to take a more prescriptive approach to ensure more widespread adoption of these land use actions, an alternative would be to establish the land use actions as rebuttable presumptions rather than safe harbors. In that situation, a rebuttal might require jurisdictions to evaluate how alternative land use actions or other actions would offer a comparable degree of impact considering market conditions and locally relevant barriers.

Diverse variety of housing types

Middle Housing

Minimum requirement: Cities could be required to take at least one action specifically focused on supporting development of middle housing. If the action is not identified in the HPS menu as supporting or potentially supporting middle housing development, the City would have to describe how that action will help overcome barriers to middle housing development. In Large and Metro Cities, the action could be required to support development of middle housing particularly in high-opportunity areas.

Safe harbor: Cities could be considered to have taken sufficient action to address the need for middle housing in the HPS if they include the following land use actions. Demonstrating that existing zoning already meets the criteria below would not qualify for the safe harbor—other action would be required to support middle housing. (This is unrelated to land sufficiency determinations in the HCA.)

- **Medium Cities**
    - Implement middle housing regulations consistent with existing rules for Large and Metro Cities (OAR 660, Division 46) for all residential land in zones subject to middle housing requirements under OAR 660-046-0205.

      –OR–

- Implement new middle housing model code for Medium Cities or standards that are no more restrictive (see note 1) for all buildable residential land in zones subject to middle housing requirements under OAR 660-046-0205.

- **Large and Metro Cities**
  - Implement new middle housing model code for Large Cities or standards that are no more restrictive, including, at a minimum:

    - 50% of buildable residential land with residential zones subject to middle housing requirements under OAR 660-046-0205;
    - 100% of development-ready land with residential zones subject to middle housing requirements under OAR OAR 660-046-0205;
    - 100% of land within high-opportunity areas with residential zones subject to middle housing requirements under OAR 660-046-0205; excluding parcels developed with existing multi-unit or middle housing and areas at elevated risk of displacement

Note: 50% of buildable residential land is intended to allow some flexibility for where this would apply to avoid making it too onerous for cities while still leading to changes for a majority of relevant buildable land.

Multi-Unit Housing

Minimum requirement: Cities could be required to take at least one action specifically focused on supporting development of multi-unit housing. If the action is not identified in the HPS menu as supporting or potentially supporting multi-unit housing development, the City would have to describe how that action will help overcome barriers to multi-unit housing development. In Large and Metro Cities, the action could be required to support development of middle housing particularly in high-opportunity areas.

Safe harbor: Cities could be considered to have taken sufficient action to address the need for multi-unit housing in the HPS if they include at least one of the following land use actions. Demonstrating that existing zoning already meets the criteria below would not qualify for the safe harbor—other action would be required to support middle housing. (This is unrelated to land sufficiency determinations in the HCA.)

- **Medium Cities**
  - Implement new multi-unit model code for Medium Cities or standards that are no more restrictive (see note 1), including, at a minimum:
    - 50% of buildable residential land with residential zones that allow multi-unit housing; and
    - 100% of development-ready land with residential zones that allow multi-unit housing
  - Implement new multi-unit model code for Small Cities or standards that are no more restrictive (see note 1) for all residential zones that allow multi-unit housing
- **Large and Metro Cities**

- Implement new multi-unit model code for Large Cities or standards that are no more restrictive (see note 1) in residential zones that allow multi-unit housing, including, at a minimum:
    - 50% of buildable residential land with residential zones that allow multi-unit housing; and
    - 100% of development-ready land with residential zones that allow multi-unit housing
    - 100% of land within high-opportunity areas with residential zones that allow multi-unit housing, excluding parcels developed with existing multi-unit housing and areas at elevated risk of displacement
- Implement new multi-unit model code for Medium Cities or standards that are no more restrictive* for all residential zones that allow multi-unit housing.

Note 1: No more restrictive means that maximum height, maximum density and/or floor area ratio, minimum lot size, parking ratio, maximum lot coverage and minimum landscaping and/or open space are individually and collectively no more restrictive than the standards in the model code, or an analysis demonstrates that the jurisdiction's zoning standards allow the same number and size of units on typical example sites.

Affordable & mixed-income housing

Minimum requirement: Cities could be required to take at least two actions specifically focused on supporting production of affordable housing (including mixed-income housing). If the actions are not identified in the HPS menu as supporting or potentially supporting affordability, the City would have to describe how that action will help overcome barriers to affordable and/or mixed-income housing development. In Large and Metro Cities, the actions could be required to support production of affordable and/or mixed-income housing particularly in high-opportunity areas.

Safe harbor: Cities could be considered to have taken sufficient action to address the need for affordable and/or mixed-income housing in the HPS if they include the following land use actions (as applicable for the city size) and one other action. Demonstrating that existing zoning already meets the criteria below would not qualify for the safe harbor—other action would be required to support affordable and/or mixed-income housing.

Note: The suggestion to require two actions for affordable housing reflects the fact that zoning reforms or incentives are typically not sufficient to deliver affordable housing without other supportive measures.

- **Medium Cities**
    - Allow affordable (see note 2) neighborhood-scale multi-unit housing (see note 3) in all urban residential zones.
- **Large and Metro Cities**
    - Allow mixed-income or affordable (see note 2) neighborhood-scale multi-unit housing (see note 3) in the following areas, at a minimum:

- 50% of buildable residential land with residential zones subject to middle housing requirements under OAR 660-046-0205;
- 100% of development-ready land with residential zones subject to middle housing requirements under OAR 660-046-0205;
- 100% of land within high-opportunity areas with residential zones subject to middle housing requirements under OAR 660-046-0205 excluding parcels developed with existing multi-unit or middle housing and areas at elevated risk of displacement.

Note 2: For purposes of this concept, affordable means Category 1C – 30-year Affordable Housing and mixed-income means Category 1B – 10-year Mixed-Income Housing (at least 20% of units affordable at 80% of AMI or less) per the new model code.

Note 3: For purposes of this concept, allowing neighborhood-scale multi-unit housing means allowing multi-unit housing with at least 12 units under standards consistent with one of the following options:

- Option A: Minimum lot size no larger than that required for single-unit detached housing; requiring no more than 0.5 parking spaces per unit; allowing a building height of at least 3 stories and 35'; subject to FAR, open space/landscaping, setbacks, and lot coverage (if applicable) no more restrictive than the new multi-unit model code for the applicable city size for the smallest lot size category.
- Option B: If no off-street parking is required, other standards are consistent with minimum compliance for quadplexes in Large Cities under existing middle housing rules (OAR 660-046-0220)

Accessible housing

Minimum requirement: Cities could be required to take at least one action specifically focused on supporting producing or retrofitting accessible housing. If the action is not identified in the HPS menu as supporting or potentially supporting accessibility, the City would have to describe how that action will help meet this need.

Safe harbor: Cities could be considered to have taken sufficient action to address the need for accessible housing in the HPS if they include at least one of the following land use actions. Demonstrating that existing zoning already meets the criteria below would not qualify for the safe harbor—other action would be required to support accessible housing.

- **Medium Cities**
  - Allow adaptable or accessible middle housing (see note 4) subject to standards no more restrictive (see note 1) than the new medium cities model code for middle housing after accounting for the bonuses provided for Category 2A and 2B units.
- **Large and Metro Cities**
  - Allow adaptable or accessible middle housing (see note 4) subject to standards no more restrictive (see note 1) than the new large cities model code for middle housing after accounting for the bonuses provided for Category 2A and 2B units.

    – OR –

- Allow multi-unit housing with 4 or more stories subject to standards no more restrictive (see note 1) than the new large cities model code for multi-unit housing after accounting for the bonuses provided for Category 2A and 2B units.

Note 4: For purposes of this concept, accessible or adaptable middle housing means middle housing that would be eligible under the new model code criteria for accessibility bonuses for the applicable housing type.

Note: this concept includes a safe harbor related to zoning to increase accessible units through encouraging development of multi-unit housing that is more likely to include Type A and/or B units, despite the fact that the CHN analysis in the previous section suggests that this may not be the most effective way to address the most pressing gaps in accessible housing because many of the other actions that could more substantively benefit accessibility (e.g., offering funding for home retrofits or for affordable housing with higher levels of accessibility features) may not be viable for many jurisdictions that do not have dedicated local funding for housing programs. The state will need to choose between encouraging cities to take land use actions that may offer some benefits for accessibility and encouraging a broader range of actions that may include targeted funding to address the most pressing accessibility needs.

Diversity of unit sizes / family-sized units

Minimum requirement: Cities could be required to take at least the following land use action to remove barriers to production of affordable housing with family-sized units:

- Allow affordable housing (see note 2) to measure density by bedroom rather than by unit for purposes of meeting minimum density standards in all residential zones that establish a minimum density.

Note: the limited requirement associated with this need is based largely on the findings in the CHN section related to need for and potential unintended consequences related to encouraging family-sized units.

CHN Research Appendix

This appendix provides additional detail on the qualitative and quantitative analysis that ECOnorthwest conducted in preparing the attached summary and recommendations related to Contextualized Housing Needs for unit mix, unit size, geographic location, accessible units, and affordable homeownership.

Unit Mix

Unit Mix Qualitative Assessment of Impact

Question: How might unit type mix assumptions in the CHN impact zoning, land use actions, or other choices a city might take to advance the policy objectives?

CHN unit mix assumptions translate OHNA targets for unit production to expected distribution of those new units by type to arrive at the number of detached single unit, middle housing, and multi-unit housing units a city will plan for over the next 20 years (in their HCA) and the next 6 - 8 years (in their HPS). Each city currently makes these assumptions based on its own analysis, without specific guidance or requirements for how the analysis should occur or what the mix should be.

DLCD has asked ECO to assess the implications of setting "high end" or "low end" assumptions in the CHN, to support the state's choices in rulemaking for development of the CHN. We assume that even a lower-end mix choice will aim for a higher portion of multi-unit or middle housing types than we see in the current stock and / or in new development patterns, or the policy objectives will not be achieved. In other words, we assume that whether low or high, the state's compliance pathways for unit mix assumptions will aim to ask cities to plan for more multi-unit and middle housing types in the future.

Interaction with the HCA / land use efficiency: Land Need Implications

Unit mix assumptions directly affect the calculation of land need; by influencing a city's choices about how much higher-density and lower-density zoned land is needed to accommodate expected growth. Current methods for projecting land need often rely on achieved density assumptions that reflect a specific unit mix. If a jurisdiction anticipates a shift in housing types—such as more apartments and fewer detached single units—those shifts will likely affect the amount of higher-density residential land needed compared to lower-density residential land, which in turn is likely to impact the total residential land need. This may make it less likely that jurisdictions will demonstrate a need for additional land or expansions to the Urban Growth Boundary (UGB).

If the jurisdiction's zoning changes and other actions combine with market viability to deliver higher density housing, this could result in more efficient residential development patterns and less need to expand outward.

However, if the housing mix that is ultimately built does not align with the needed mix, some land planned for higher density housing may be developed at lower densities, resulting in less capacity than expected, or

higher-density residential land may sit vacant while lower-density residential land is built out more quickly. Either of these situations could result in the jurisdiction having less than a 20-year supply of buildable land in reality, even though the HCA shows that they have sufficient land. HCAs must be updated every 6 to 8 years, so a jurisdiction could potentially adjust partway through the 20-year planning period but given how challenging and drawn out UGB expansions can be, there is still some risk of running short of residential land if the land needs are dramatically underestimated.

A greater need for higher-density residential land and smaller need for lower-density residential land could also result in jurisdictions needing or choosing to accommodate that need for higher-density residential land in UGB expansion areas at the edge. This could encourage jurisdictions to plan for a mix of different housing types within future residential areas. However, if the jurisdiction is unable to also demonstrate a need for land for other residential densities, it risks creating isolated pockets of high-density housing that do not align with transportation infrastructure, community goals, or the desired diversity of housing types. These imbalances can negatively impact livability and accessibility in new developments.

INTERACTION WITH THE HPS / ACTION SELECTION

In the HPS, CHN assumptions about unit mix can also impact the actions that cities select to encourage the production of those unit types. However, there is not a mathematical relationship between the identified needs and action selection, so it is less clear how and to what extent having a higher or lower share of middle housing and/or multi-unit housing in the CHN would drive different action selection. For some jurisdictions, identifying a need for a higher share of middle housing and/or multi-unit housing could lead to a greater focus on action to support middle housing or multi-unit housing development and could make a difference in which actions are selected and how they are implemented. And, it is possible that cities might find greater political and community support to focus actions / effort on supporting market-rate multi-unit housing and middle housing. Setting CHN needs for middle housing and multi-unit housing lower could mean that some jurisdictions choose to take fewer or more modest/easier actions to address these needs because the need is not perceived to be as great.

If jurisdictions opt to or are required to select land use actions to support middle housing or multi-unit housing development, this could include the following categories of actions:

- Regulatory Requirements or Policy - actions that impose new requirements, mandates, or limitations on development aimed at ensuring new development meets specific goals or needs
- Reduce Regulatory and Permitting Barriers - actions that increase flexibility or streamline permitting for certain types of development
- Zoning or Regulatory Incentives - actions that offer optional incentives within the zoning code or other regulations for certain types of development

The implications of these actions and the potential implications of having a higher or lower share of middle housing and/or multi-unit housing in the CHN depend on which type of actions jurisdictions implement. In general, actions to reduce regulatory or permitting barriers and zoning or regulatory incentives have relatively low risk of unintended consequences that could negatively impact overall housing production or any of the

policy objectives; the primary risk is that they could take staff time and energy with little impact if not implemented effectively or in the right context. Regulatory requirements or policies have more potential for unintended consequences on development, but if calibrated and implemented effectively, they potentially have a greater impact in some circumstances. Specific actions where the CHN needs for middle housing and multi-unit housing could impact whether and how the actions are implemented in ways that could be beneficial, or problematic include:

- Housing mix requirements for larger developments (RR-1 in the working draft updated actions list): Jurisdictions might use the overall needed housing mix to inform housing mix requirements for large developments.
    - *Potential positive consequences:* If the required housing mix reflects a moderate shift relative to past trends, it could encourage inclusion of more middle housing and multi-unit housing than would otherwise be built.
    - *Potential negative consequences:* If the mix is substantially above past trends and not financially viable or out of step with market demand, this requirement could have a chilling effect on development activity. Developers may delay or forgo projects entirely if the requirements are incompatible with feasible project economics, or the planned mix components may lag behind other housing types, delaying housing production.
- Minimum densities (RR-5 in the working draft updated actions list) and Upzone residential land (RB-7 in the working draft updated actions list): Jurisdictions might impose higher minimum densities or prohibit single-unit detached housing in some zones to try to align with the needed mix, or rezone buildable land to zones that are more aligned with middle housing and/or multi-unit housing.
    - *Potential positive consequences:* In some cases, this could reduce competition from single-unit detached housing and expand opportunities to develop middle housing and/or multi-unit housing, making it easier for developers of other types of housing to secure land.
    - *Potential negative consequences:* If applied too extensively, this could overly restrict land availability for single-unit detached housing and other forms that may be more aligned with current market feasibility. This not only reduces the likelihood that recently viable housing types will continue to be produced but also increases the risk that higher-density development may not pencil out financially. The result could be a decline in overall housing production due to a misalignment with what the market can support.
    - *Potential negative consequences:* Although empirical evidence is limited, there is a risk that upzoning may increase the speculative value of land. This refers to the price landowners believe their property is worth—often inflated by the expectation of future development—rather than what developers are actually willing to pay. Without a completed transaction, it's difficult to measure the real market impact of zoning changes. However, inflated land values driven by speculation can limit the supply of land available for development, further constraining housing production.

Data Considerations

- While not always true in all markets, our analysis found that, in general, denser housing types are more affordable (see data on affordability by type / type by affordability).[7] In particular, regulated affordable units recently funded by OHCS are largely multi-unit. To the extent that the land efficiency measures, zoning, and housing production policies that cities set successfully result in the production of a higher proportion of multi-unit and middle housing types without hindering the ability of the housing market to meet overall demand through total unit production, the overall affordability of the stock should be improved.
- Our analysis generally found that, in aggregate, small cities have a higher share of new units in detached single-unit structures than large and metro cities (60.5% compared to 42.6%); however, the variation within these size groupings is relatively large. Metro and the Willamette Valley regions have lower shares of new units in single-unit detached structures compared to other regions of the state, though there is substantial variation at the regional level as well.
- The degree of variation suggests that **selecting a high or low end that works perfectly across all cities within a size group or region is not likely to be possible** -- some outliers will already be producing more multi-unit or middle housing units than nearly any selected high or low end. The state may be able to design the compliance pathway to mitigate this to some extent (e.g., by directing cities to use their recent trends or the established share, whichever is higher), but this could reduce the benefit of the compliance pathway for the jurisdiction due to the additional work required.

Market Considerations

Housing developers play many roles in the delivery of new housing, but their most critical function is securing the debt and equity needed to finance construction. To attract capital, developers assess the costs of producing different types and densities of housing against the rents or sale prices achievable in the local market. Complicating this further, most developers specialize in specific types of housing. For instance, those who build single-unit detached homes often do not build multi-unit housing, and even within multi-unit, developers of rental apartments may not build for-sale condominiums.

This leads to a key implication: developers with a track record of producing housing in a given market may lack the expertise, relationships, or financial backing to deliver higher-density housing than what has historically been built. Zoning that forces a shift in housing mix may actually reduce the number of capable developers, thereby limiting the market's capacity to scale up production.

While statewide data suggest that denser housing is generally more affordable, there are important cost inflection points as building prototypes grow in complexity. For example, the jump from a three-story walk-up to a four-story building with an elevator significantly increases construction costs. Developers aim to align construction costs with achievable rents or sales prices to ensure market feasibility. As a result, the maximum

[7] An important exception: in smaller and more rural cities, single-unit detached development (even when newly constructed) is a key source of middle-income home ownership product.

allowed density is often not financially viable. In these cases, setting a high-density zoning threshold may be less effective at boosting housing production than setting a lower, more feasible threshold.

Additional Considerations

It is unclear how compliance pathways will interact with other required upzoning policies that have been implemented in the last several years or are just now taking effect (e.g., middle housing legislation, Climate Friendly Equitable Communities rules). Some cities may have relatively few regulatory barriers to middle housing and/or multi-unit housing already due to those changes, while in others more substantive barriers may still remain. In many cities, the impacts of the regulatory changes in response to these requirements have only very recently started to show up in permitting data, and it may take several more years to see a real shift in development outcomes that would be reflected in achieved density numbers. The rules could create a situation where jurisdictions are needing to update development regulations faster than they can see and measure the response to those updates. This could also create a perception that the regulatory reforms are not working, whether or not this is accurate.

The compliance tool design could also have an impact on outcomes:

- Optional pathways (like safe harbors or rebuttable presumptions) would give cities the ability to evaluate their own markets and development patterns and determine if the suggested mix is likely to result in unintended consequences in their communities.
- Optional pathways may not be attractive if the targets in them are substantially higher than the jurisdiction would have set on their own, and above what is politically viable.
- If safe harbors or rebuttable presumptions carry the benefit of helping cities avoid legal challenges on their findings of land needs, jurisdictions that are expecting to need a UGB expansion and expecting it to be contentious would be more likely to opt in to those safe harbors, even if they are not a perfect fit for local conditions.

If compliance pathways are structured as minimum compliance, jurisdictions with more pro-housing local politics are more likely to choose to exceed the minimum requirements, while those with less pro-housing political support are more likely to elect to do the minimum, even if this is lower than staff might have recommended.

Unit Mix Data Appendix

1) Baseline housing mix

1a) Permit trends: housing mix of new housing

Prompt: What is the housing type mix of recently built housing for cities based on permit data, and how does it vary by OHNA region and by city size?

Data source: HUD State of the Cities Database (SOCDS), 2015-2023 annual permits, aggregated

Limitations: Several Oregon cities (Canby, Gladstone, Molalla, Roseburg, The Dalles, Klamath Falls) are not accurately represented in SOCDS - showing zero permit records over the last 8 years, which is highly unlikely. The cause is that these cities are not captured at all in the Census Building Permit Survey - the database that feeds into SOCDS.

Potentially reliable patterns by region and/or city size:

City size: small cities have a higher share of new units in single-unit detached structures than large and metro cities in aggregate (60.5% compared to 42.6%); however, the variation within these size groupings is relatively large.

Region: Metro and the Willamette Valley regions have lower shares of new units in single-unit detached structures compared to other regions of the state, though there is substantial variation at the regional level as well.

Figure 8: Housing Permits by Housing Type and City Size

Variable	City Size	Count of Permits	Percent
Units in Single Family Structures	10k-25k	5,836	60.5%
Units in 2-Unit Multifamily Structures	10k-25k	432	4.5%
Units in 3 & 4-Unit Multifamily Structures	10k-25k	225	2.3%
Units in 5+ Unit Multifamily Structures	10k-25k	3,160	32.7%
Units in Single Family Structures	Metro or >25K	49,332	42.6%
Units in 2-Unit Multifamily Structures	Metro or >25K	2,490	2.2%
Units in 3 & 4-Unit Multifamily Structures	Metro or >25K	901	0.8%
Units in 5+ Unit Multifamily Structures	Metro or >25K	62,967	54.4%

Figure 9: Housing Permits by Housing Type and City Size

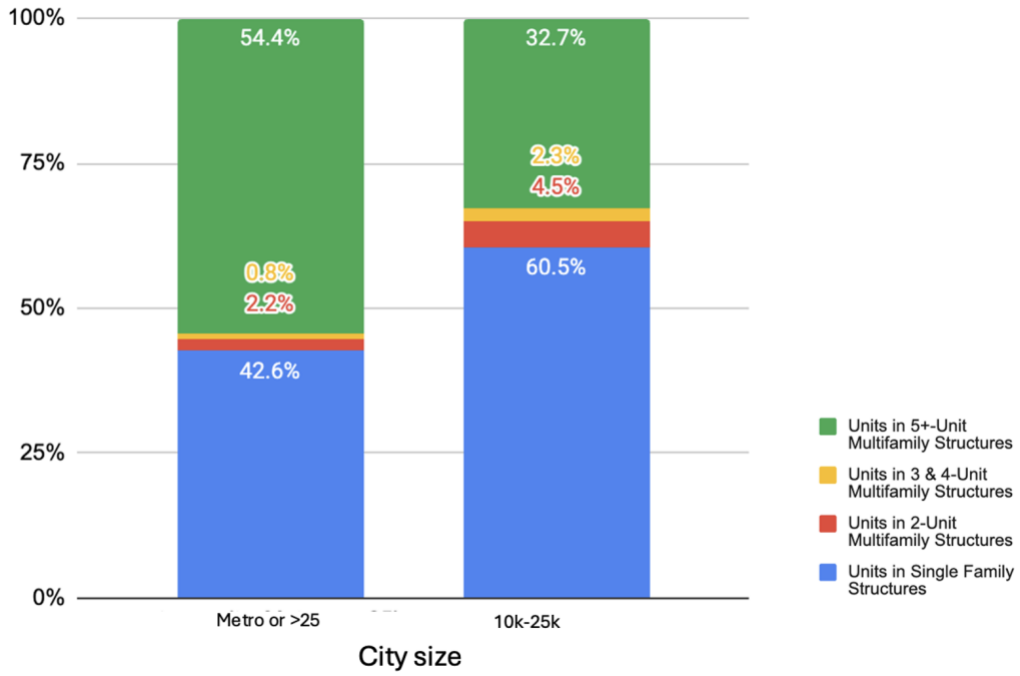


Figure 10: Housing Permits by Housing Type and OHNA Region

Region	Variable	Count of Permits	Percent
Central	Units in Single Family Structures	10,561	65.5%
Central	Units in 2-Unit Multifamily Structures	664	4.1%
Central	Units in 3 & 4-Unit Multifamily Structures	128	0.8%
Central	Units in 5+ Unit Multifamily Structures	4,766	29.6%
Metro	Units in Single Family Structures	23,500	33.5%
Metro	Units in 2-Unit Multifamily Structures	954	1.4%
Metro	Units in 3 & 4-Unit Multifamily Structures	488	0.7%
Metro	Units in 5+ Unit Multifamily Structures	45,115	64.4%
Northeast	Units in Single Family Structures	1,315	62.3%
Northeast	Units in 2-Unit Multifamily Structures	102	4.8%
Northeast	Units in 3 & 4-Unit Multifamily Structures	31	1.5%
Northeast	Units in 5+ Unit Multifamily Structures	662	31.4%
Northern Coast	Units in Single Family Structures	371	60.1%
Northern Coast	Units in 2-Unit Multifamily Structures	20	3.2%
Northern Coast	Units in 3 & 4-Unit Multifamily Structures	7	1.1%
Northern Coast	Units in 5+ Unit Multifamily Structures	219	35.5%

Region	Variable	Count of Permits	Percent
Southeast	Units in Single Family Structures	67	97.1%
Southeast	Units in 2-Unit Multifamily Structures	2	2.9%
Southeast	Units in 3 & 4-Unit Multifamily Structures	0	0.0%
Southeast	Units in 5+ Unit Multifamily Structures	0	0.0%
Southwest	Units in Single Family Structures	4,680	66.8%
Southwest	Units in 2-Unit Multifamily Structures	354	5.1%
Southwest	Units in 3 & 4-Unit Multifamily Structures	147	2.1%
Southwest	Units in 5+ Unit Multifamily Structures	1,823	26.0%

Figure 11: Housing Permits by Housing Type and City Size (distribution of city %s)

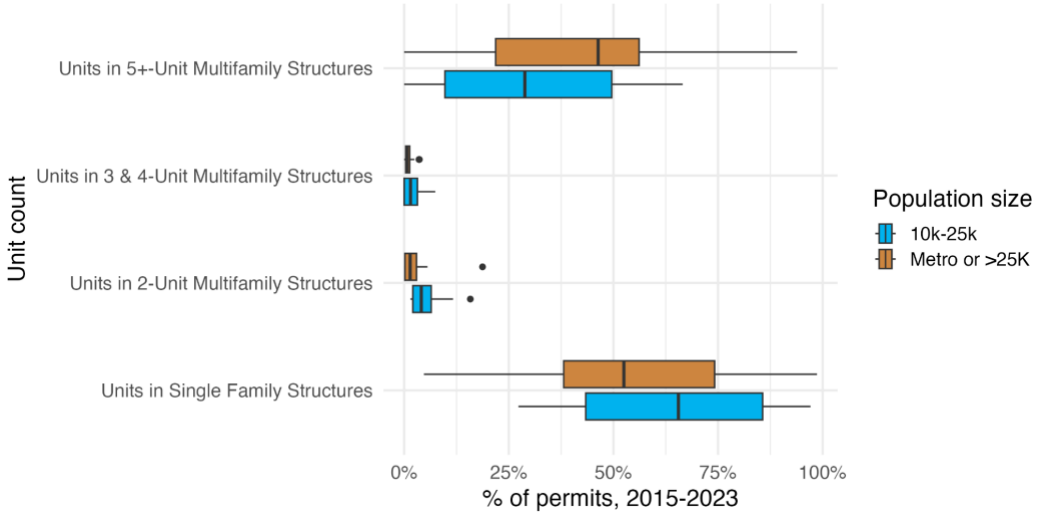
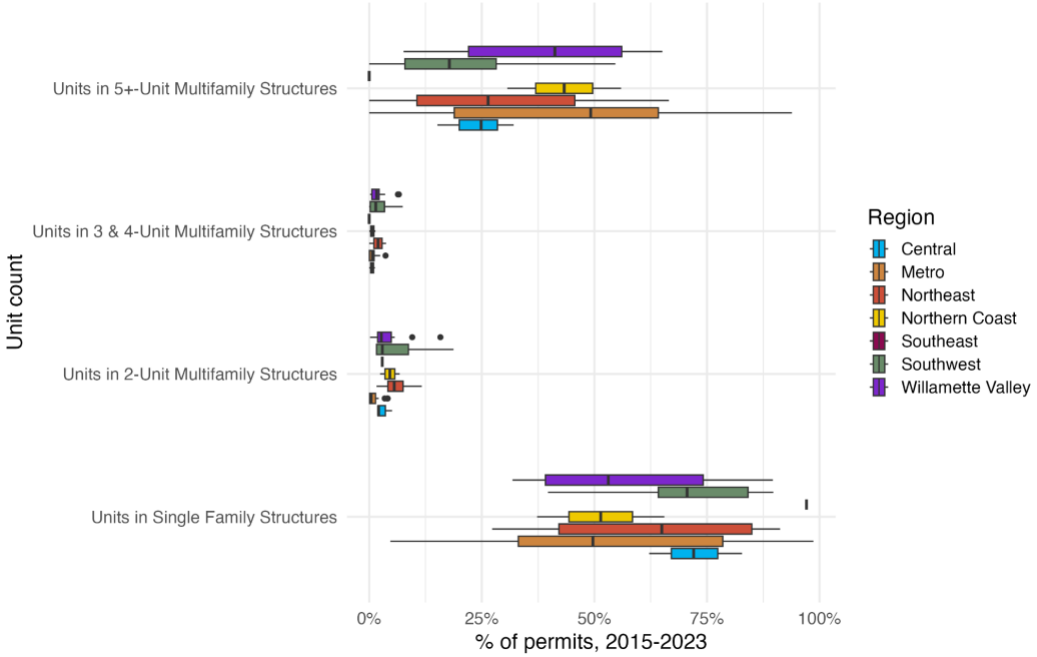


Figure 12: Housing Permits by Housing Type and OHNA Region (distribution of city %s)



1b) Housing type mix of all existing housing stock

Prompt: Housing type mix of all existing housing stock by jurisdiction

Data source: ACS 5-year 2023, place level

Limitations: Usual limitations with Census data for smaller cities. The data visualization uses point estimates to display the interquartile range by region or size. It is not possible to include the margin of error (MOE) for the estimate because each individual point has its own MOE, and including the MOE for each (while possible) would obscure the desired outcome of understanding the range and its midpoint. If you were to explore MOE per each point, it might increase the perceived variance by region.

Figure 13: Existing Housing Stock by Housing Type and City Size (% of total existing stock)

City Size	Unit Type	Count	Percent
10k-25k	SFD	87,116	62.3%
10k-25k	Middle housing	22,712	16.3%
10k-25k	5+ units	20,654	14.8%
10k-25k	Mobile home/other	9,268	6.6%
Metro or >25K	SFD	551,660	56.3%
Metro or >25K	Middle housing	146,667	15.0%
Metro or >25K	5+ units	252,467	25.8%
Metro or >25K	Mobile home/other	28,211	2.9%

Figure 14: Existing Housing Stock by Housing Type and OHNA Region (% of existing stock):

City Size	Unit Type	Count	Percent
Central	SFD	46,082	70.6%
Central	Middle housing	8,456	13.0%
Central	5+ units	7,962	12.2%
Central	Mobile home/other	2,771	4.2%
Metro	SFD	322,174	54.2%
Metro	Middle housing	87,386	14.7%
Metro	5+ units	174,639	29.4%
Metro	Mobile home/other	9,922	1.7%
Northeast	SFD	19,708	62.5%
Northeast	Middle housing	4,188	13.3%
Northeast	5+ units	4,673	14.8%
Northeast	Mobile home/other	2,940	9.3%
Northern Coast	SFD	7,030	66.2%
Northern Coast	Middle housing	2,107	19.8%
Northern Coast	5+ units	1,171	11.0%
Northern Coast	Mobile home/other	317	3.0%
Southeast	SFD	9,355	62.6%
Southeast	Middle housing	2,604	17.4%
Southeast	5+ units	2,240	15.0%
Southeast	Mobile home/other	739	4.9%
Southwest	SFD	61,174	64.0%
Southwest	Middle housing	16,238	17.0%
Southwest	5+ units	13,808	14.4%
Southwest	Mobile home/other	4,357	4.6%
Willamette Valley	SFD	173,253	56.5%
Willamette Valley	Middle housing	48,400	15.8%
Willamette Valley	5+ units	68,628	22.4%
Willamette Valley	Mobile home/other	16,433	5.4%

Figure 15: Existing Housing Stock by Housing Type and City Size (distributions of city %s)

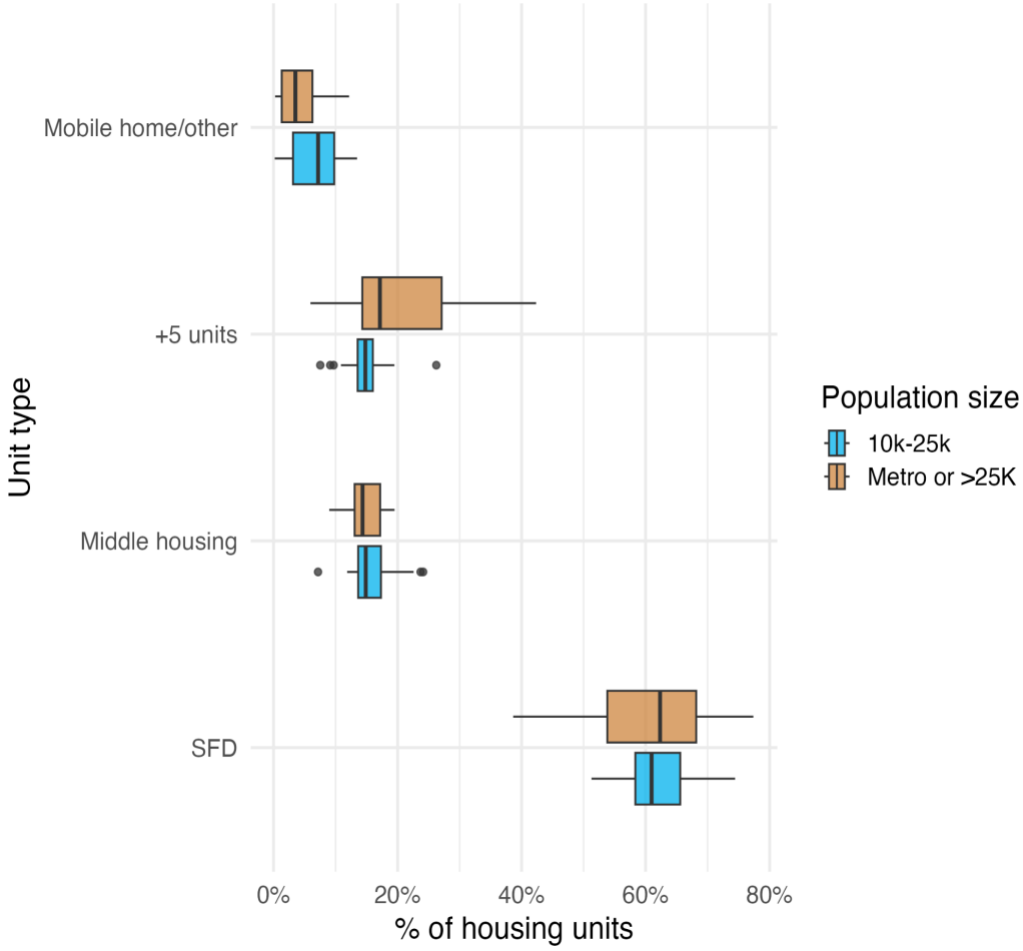
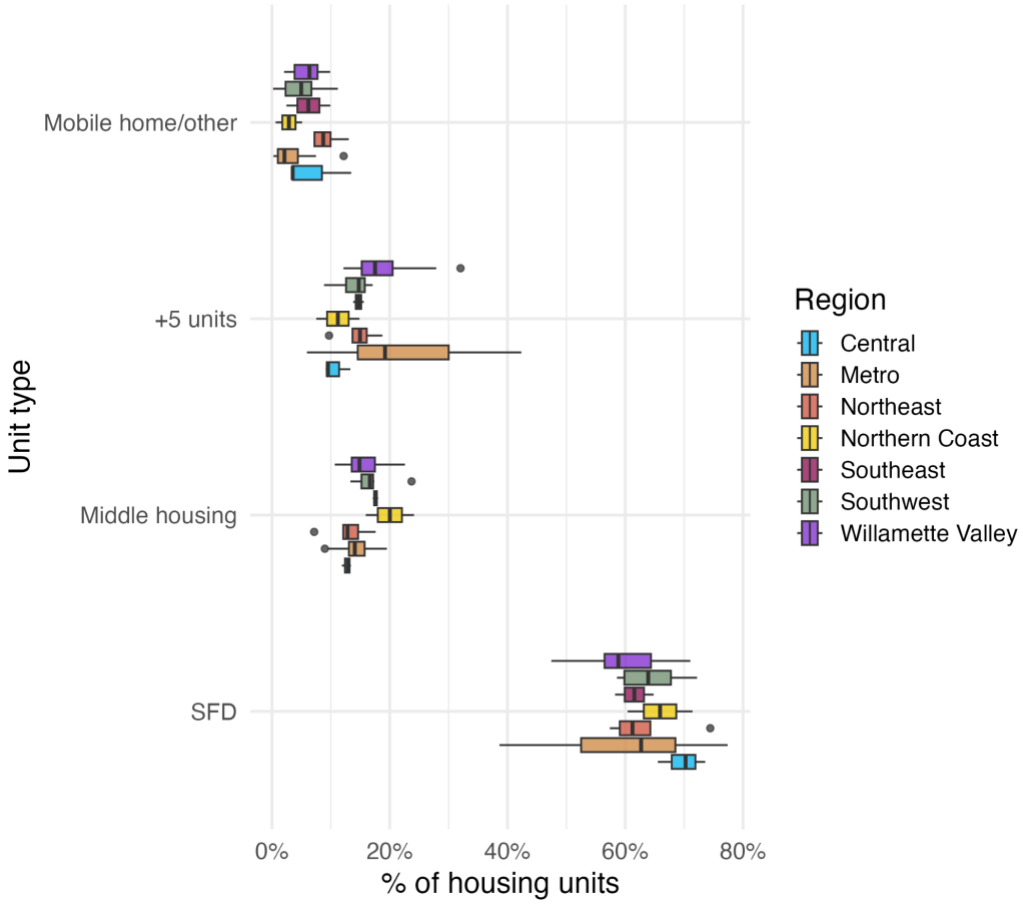


Figure 16: Existing Housing Stock by Housing Type and OHNA Region (distributions of city %s)



2) Affordability by Type / Type by Affordability

2a) Affordability of existing housing stock by type

Prompt: Provide data tables of type mix of units affordable at each income bracket. Update to reflect unit affordability (rather than household income), only available at regional level through PUMS.

Data source: 2023 PUMS 5-year

Limitations: Can only crosstab by region for PUMS. We calculated a rule-of-thumb statistical reliability test - estimates for which the standard error is more than 30% of the estimated value are classified unreliable and are not shown on charts derived from PUMS.

Potentially reliable patterns by region and/or city size: For most regions in the state, at higher affordability brackets, the housing typology mix swings towards single-unit detached housing. At lower affordability brackets, housing type diversity increases - middle housing, 5+ unit apartments, and mobile homes/other types become more prevalent. The Metro region is the only region in the state where 30-60% and 60-80% AMI units are predominantly composed of 5+ unit apartments. In most regions, the most deeply affordable existing units include larger shares of mobile homes and single-unit detached.

Figure 17: Affordability of Existing Housing Stock by Type and OHNA Region

Note: each facet sums to 100% for new stock and existing stock, white spaces on the charts indicate estimates that did not pass a statistical reliability test.

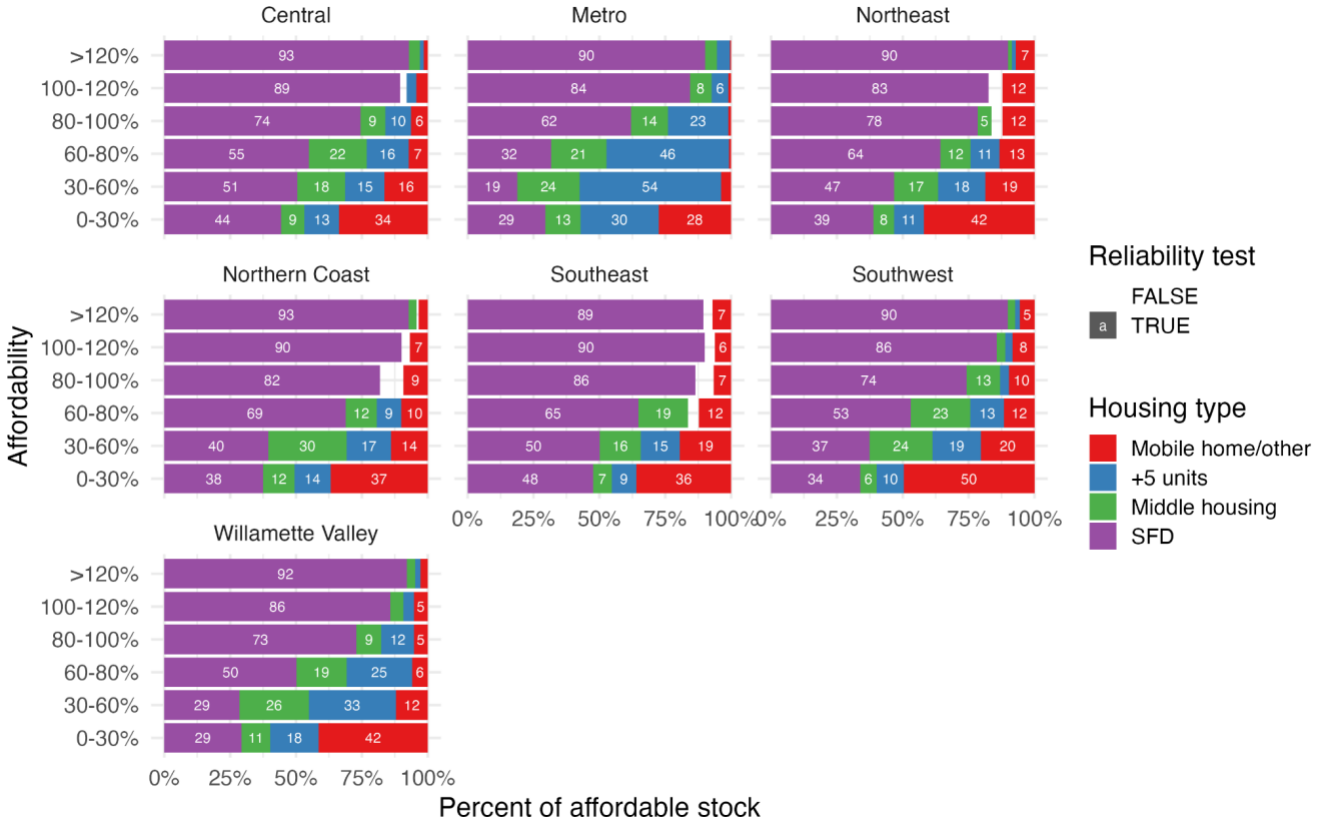


Figure 18: Existing Housing Stock by Type, Income Level, and OHNA Region (% of total existing stock)

Region	Income Level	Housing Type	Count	Count by Income Level	Share of Type within Income Level
Central	0-30%	Mobile home /other	2,959	8,768	33.7%
Central	0-30%	5+ units	1,145	8,768	13.1%
Central	0-30%	Middle housing	781	8,768	8.9%
Central	0-30%	SFD	3,883	8,768	44.3%
Central	30-60%	Mobile home/other	2,247	13,720	16.4%
Central	30-60%	5+ units	2,056	13,720	15.0%
Central	30-60%	Middle housing	2,486	13,720	18.1%
Central	30-60%	SFD	6,931	13,720	50.5%
Central	60-80%	Mobile home/other	968	13,198	7.3%
Central	60-80%	5+ units	2,103	13,198	15.9%
Central	60-80%	Middle housing	2,883	13,198	21.8%

Region	Income Level	Housing Type	Count	Count by Income Level	Share of Type within Income Level
Central	60-80%	SFD	7,244	13,198	54.9%
Central	80-100%	Mobile home/other	665	10,514	6.3%
Central	80-100%	5+ units	1,032	10,514	9.8%
Central	80-100%	Middle housing	994	10,514	9.5%
Central	80-100%	SFD	7,823	10,514	74.4%
Central	100-120%	Mobile home/other	458	10,655	4.3%
Central	100-120%	5+ units	392	10,655	3.7%
Central	100-120%	Middle housing	276	10,655	2.6%
Central	100-120%	SFD	9,529	10,655	89.4%
Central	>120%	Mobile home/other	718	45,648	1.6%
Central	>120%	5+ units	627	45,648	1.4%
Central	>120%	Middle housing	1,932	45,648	4.2%
Central	>120%	SFD	42,371	45,648	92.8%
Metro	0-30%	Mobile home/other	12,659	45,944	27.6%
Metro	0-30%	5+ units	13,594	45,944	29.6%
Metro	0-30%	Middle housing	6,150	45,944	13.4%
Metro	0-30%	SFD	13,541	45,944	29.5%
Metro	30-60%	Mobile home/other	5,083	129,651	3.9%
Metro	30-60%	5+ units	69,497	129,651	53.6%
Metro	30-60%	Middle housing	30,625	129,651	23.6%
Metro	30-60%	SFD	24,446	129,651	18.9%
Metro	60-80%	Mobile home/other	1,107	139,452	0.8%
Metro	60-80%	5+ units	64,823	139,452	46.5%
Metro	60-80%	Middle housing	29,351	139,452	21.0%
Metro	60-80%	SFD	44,171	139,452	31.7%
Metro	80-100%	Mobile home/other	1,043	92,777	1.1%
Metro	80-100%	5+ units	21,199	92,777	22.8%
Metro	80-100%	Middle housing	13,055	92,777	14.1%
Metro	80-100%	SFD	57,480	92,777	62.0%
Metro	100-120%	Mobile home/other	954	93,499	1.0%
Metro	100-120%	5+ units	6,022	93,499	6.4%
Metro	100-120%	Middle housing	7,650	93,499	8.2%
Metro	100-120%	SFD	78,873	93,499	84.4%
Metro	>120%	Mobile home/other	1,148	241,197	0.5%

Region	Income Level	Housing Type	Count	Count by Income Level	Share of Type within Income Level
Metro	>120%	5+ units	11,745	241,197	4.9%
Metro	>120%	Middle housing	10,886	241,197	4.5%
Metro	>120%	SFD	217,418	241,197	90.1%
Northeast	0-30%	Mobile home/other	4,591	10,912	42.1%
Northeast	0-30%	5+ units	1,223	10,912	11.2%
Northeast	0-30%	Middle housing	864	10,912	7.9%
Northeast	0-30%	SFD	4,234	10,912	38.8%
Northeast	30-60%	Mobile home/other	3,655	19,545	18.7%
Northeast	30-60%	5+ units	3,505	19,545	17.9%
Northeast	30-60%	Middle housing	3,270	19,545	16.7%
Northeast	30-60%	SFD	9,115	19,545	46.6%
Northeast	60-80%	Mobile home/other	1,401	10,577	13.2%
Northeast	60-80%	5+ units	1,154	10,577	10.9%
Northeast	60-80%	Middle housing	1,217	10,577	11.5%
Northeast	60-80%	SFD	6,805	10,577	64.3%
Northeast	80-100%	Mobile home/other	905	7,391	12.2%
Northeast	80-100%	5+ units	306	7,391	4.1%
Northeast	80-100%	Middle housing	388	7,391	5.2%
Northeast	80-100%	SFD	5,792	7,391	78.4%
Northeast	100-120%	Mobile home/other	848	6,928	12.2%
Northeast	100-120%	5+ units	240	6,928	3.5%
Northeast	100-120%	Middle housing	124	6,928	1.8%
Northeast	100-120%	SFD	5,716	6,928	82.5%
Northeast	>120%	Mobile home/other	1,680	23,739	7.1%
Northeast	>120%	5+ units	379	23,739	1.6%
Northeast	>120%	Middle housing	314	23,739	1.3%
Northeast	>120%	SFD	21,366	23,739	90.0%
Northern Coast	0-30%	Mobile home/other	2,185	5,931	36.8%
Northern Coast	0-30%	5+ units	818	5,931	13.8%
Northern Coast	0-30%	Middle housing	701	5,931	11.8%
Northern Coast	0-30%	SFD	2,227	5,931	37.5%
Northern Coast	30-60%	Mobile home/other	1,714	12,279	14.0%
Northern Coast	30-60%	5+ units	2,065	12,279	16.8%
Northern Coast	30-60%	Middle housing	3,649	12,279	29.7%

Region	Income Level	Housing Type	Count	Count by Income Level	Share of Type within Income Level
Northern Coast	30-60%	SFD	4,851	12,279	39.5%
Northern Coast	60-80%	Mobile home/other	613	6,107	10.0%
Northern Coast	60-80%	5+ units	567	6,107	9.3%
Northern Coast	60-80%	Middle housing	717	6,107	11.7%
Northern Coast	60-80%	SFD	4,210	6,107	68.9%
Northern Coast	80-100%	Mobile home/other	450	4,862	9.3%
Northern Coast	80-100%	5+ units	144	4,862	3.0%
Northern Coast	80-100%	Middle housing	287	4,862	5.9%
Northern Coast	80-100%	SFD	3,981	4,862	81.9%
Northern Coast	100-120%	Mobile home/other	406	5,889	6.9%
Northern Coast	100-120%	5+ units	18	5,889	0.3%
Northern Coast	100-120%	Middle housing	164	5,889	2.8%
Northern Coast	100-120%	SFD	5,301	5,889	90.0%
Northern Coast	>120%	Mobile home/other	538	15,554	3.5%
Northern Coast	>120%	5+ units	113	15,554	0.7%
Northern Coast	>120%	Middle housing	480	15,554	3.1%
Northern Coast	>120%	SFD	14,423	15,554	92.7%
Southeast	0-30%	Mobile home/other	2,323	6,465	35.9%
Southeast	0-30%	5+ units	602	6,465	9.3%
Southeast	0-30%	Middle housing	460	6,465	7.1%
Southeast	0-30%	SFD	3,080	6,465	47.6%
Southeast	30-60%	Mobile home/other	2,292	11,772	19.5%
Southeast	30-60%	5+ units	1,744	11,772	14.8%
Southeast	30-60%	Middle housing	1,845	11,772	15.7%
Southeast	30-60%	SFD	5,891	11,772	50.0%
Southeast	60-80%	Mobile home/other	733	6,017	12.2%
Southeast	60-80%	5+ units	249	6,017	4.1%
Southeast	60-80%	Middle housing	1,138	6,017	18.9%
Southeast	60-80%	SFD	3,897	6,017	64.8%
Southeast	80-100%	Mobile home/other	313	4,762	6.6%
Southeast	80-100%	5+ units	136	4,762	2.9%
Southeast	80-100%	Middle housing	200	4,762	4.2%
Southeast	80-100%	SFD	4,113	4,762	86.4%
Southeast	100-120%	Mobile home/other	245	3,993	6.1%

Region	Income Level	Housing Type	Count	Count by Income Level	Share of Type within Income Level
Southeast	100-120%	5+ units	54	3,993	1.4%
Southeast	100-120%	Middle housing	100	3,993	2.5%
Southeast	100-120%	SFD	3,594	3,993	90.0%
Southeast	>120%	Mobile home/other	882	12,433	7.1%
Southeast	>120%	5+ units	114	12,433	0.9%
Southeast	>120%	Middle housing	312	12,433	2.5%
Southeast	>120%	SFD	11,125	12,433	89.5%
Southwest	0-30%	Mobile home/other	10,855	21,874	49.6%
Southwest	0-30%	5+ units	2,255	21,874	10.3%
Southwest	0-30%	Middle housing	1,357	21,874	6.2%
Southwest	0-30%	SFD	7,407	21,874	33.9%
Southwest	30-60%	Mobile home/other	7,224	35,571	20.3%
Southwest	30-60%	5+ units	6,591	35,571	18.5%
Southwest	30-60%	Middle housing	8,468	35,571	23.8%
Southwest	30-60%	SFD	13,288	35,571	37.4%
Southwest	60-80%	Mobile home/other	3,429	29,744	11.5%
Southwest	60-80%	5+ units	3,808	29,744	12.8%
Southwest	60-80%	Middle housing	6,719	29,744	22.6%
Southwest	60-80%	SFD	15,788	29,744	53.1%
Southwest	80-100%	Mobile home/other	2,263	23,238	9.7%
Southwest	80-100%	5+ units	764	23,238	3.3%
Southwest	80-100%	Middle housing	2,963	23,238	12.8%
Southwest	80-100%	SFD	17,248	23,238	74.2%
Southwest	100-120%	Mobile home/other	1,780	21,532	8.3%
Southwest	100-120%	5+ units	623	21,532	2.9%
Southwest	100-120%	Middle housing	673	21,532	3.1%
Southwest	100-120%	SFD	18,456	21,532	85.7%
Southwest	>120%	Mobile home/other	4,456	81,430	5.5%
Southwest	>120%	5+ units	1,512	81,430	1.9%
Southwest	>120%	Middle housing	2,358	81,430	2.9%
Southwest	>120%	SFD	73,104	81,430	89.8%
Willamette Valley	0-30%	Mobile home/other	16,530	39,823	41.5%
Willamette Valley	0-30%	5+ units	7,297	39,823	18.3%
Willamette Valley	0-30%	Middle housing	4,332	39,823	10.9%

Region	Income Level	Housing Type	Count	Count by Income Level	Share of Type within Income Level
Willamette Valley	0-30%	SFD	11,664	39,823	29.3%
Willamette Valley	30-60%	Mobile home/other	11,432	94,863	12.1%
Willamette Valley	30-60%	5+ units	31,425	94,863	33.1%
Willamette Valley	30-60%	Middle housing	24,892	94,863	26.2%
Willamette Valley	30-60%	SFD	27,114	94,863	28.6%
Willamette Valley	60-80%	Mobile home/other	4,966	83,913	5.9%
Willamette Valley	60-80%	5+ units	20,923	83,913	24.9%
Willamette Valley	60-80%	Middle housing	15,902	83,913	19.0%
Willamette Valley	60-80%	SFD	42,122	83,913	50.2%
Willamette Valley	80-100%	Mobile home/other	2,916	55,909	5.2%
Willamette Valley	80-100%	5+ units	6,923	55,909	12.4%
Willamette Valley	80-100%	Middle housing	5,259	55,909	9.4%
Willamette Valley	80-100%	SFD	40,811	55,909	73.0%
Willamette Valley	100-120%	Mobile home/other	2,435	45,939	5.3%
Willamette Valley	100-120%	5+ units	1,864	45,939	4.1%
Willamette Valley	100-120%	Middle housing	2,248	45,939	4.9%
Willamette Valley	100-120%	SFD	39,392	45,939	85.7%
Willamette Valley	>120%	Mobile home/other	4,185	147,534	2.8%
Willamette Valley	>120%	5+ units	2,958	147,534	2.0%
Willamette Valley	>120%	Middle housing	4,528	147,534	3.1%
Willamette Valley	>120%	SFD	135,863	147,534	92.1%

2b) Affordability of newer housing stock by type (per Census)

Prompt: Provide data tables of type mix of units affordable at each income bracket. Same analysis limited to units built recently (e.g., since 2010).

Data source: 2023 PUMS 5-year

Limitations: We can only define new construction by decade prior to 2020, so we have to use 2010 as the breakpoint when using PUMS. Doing so also decreases the margins of error (MOEs) thanks to more observations by region, but the crosstabs by new construction still show highly unreliable estimates for some regions/housing types. PUMS data are only available by region. We calculated a rule-of-thumb statistical reliability test - estimates for which the standard error is more than 30% of the estimated value are classified unreliable and are not shown on charts derived from PUMS.

Potentially reliable patterns by region and/or city size: Cross-tabbing by year of construction, type, region, and affordability yields much fewer statistically reliable estimates compared to the chart above. For all regions, new construction >120% AMI units are largely composed of single-unit detached units. In Northeast, Metro and Willamette Valley region though, new units below 120% show a distinct swing towards 5+ unit apartments compared to the existing stock at those levels.

Figure 19: Affordability of Existing Housing Stock by Housing Type and OHNA Region

Note: each facet sums to 100% for new stock and existing stock, white spaces on the charts indicate estimates that did not pass a statistical reliability test.

2c) Housing type mix of all existing housing stock

Prompt: Housing type mix of all existing housing stock by jurisdiction (ACS 2023 5-year data, place level)

Data source: ACS 5-year 2023, place level

Limitations: Usual limitations with Census data for smaller cities. The data visualization uses point estimates to display the interquartile range by region or size. It is not possible to include the margin of error (MOE) for the estimate because each individual point has its own margin of error (MOE) and including the MOE for each would obscure the desired outcome of understanding the range and its midpoint. If you were to provide MOE per each point, it might increase the perceived variance by region.

Figure 20: Existing Housing Stock by Housing Type Mix and City Size (% of total existing stock)

City Size	Unit Type	Count of Units	Percent
10k-25k	SFD	87,116	62.3%
10k-25k	Middle housing	22,712	16.3%
10k-25k	5+ units	20,654	14.8%
10k-25k	Mobile home/other	9,268	6.6%
Metro or >25K	SFD	551,660	56.3%
Metro or >25K	Middle housing	146,667	15.0%
Metro or >25K	5+ units	252,467	25.8%
Metro or >25K	Mobile home/other	28,211	2.9%

Figure 21: Existing Housing Stock by Housing Type Mix and OHNA Region (% of existing stock)

Region	Unit Type	Count of Units	Percent
Central	SFD	46,082	70.6%
Central	Middle housing	8,456	13.0%
Central	5+ units	7,962	12.2%
Central	Mobile home/other	2,771	4.2%
Metro	SFD	322,174	54.2%
Metro	Middle housing	87,386	14.7%
Metro	5+ units	174,639	29.4%
Metro	Mobile home/other	9,922	1.7%
Northeast	SFD	19,708	62.5%
Northeast	Middle housing	4,188	13.3%
Northeast	5+ units	4,673	14.8%
Northeast	Mobile home/other	2,940	9.3%
Northern Coast	SFD	7,030	66.2%
Northern Coast	Middle housing	2,107	19.8%
Northern Coast	5+ units	1,171	11.0%
Northern Coast	Mobile home/other	317	3.0%
Southeast	SFD	9,355	62.6%
Southeast	Middle housing	2,604	17.4%
Southeast	5+ units	2,240	15.0%
Southeast	Mobile home/other	739	4.9%

Southwest	SFD	61,174	64.0%
Southwest	Middle housing	16,238	17.0%
Southwest	5+ units	13,808	14.4%
Southwest	Mobile home/other	4,357	4.6%
Willamette Valley	SFD	173,253	56.5%
Willamette Valley	Middle housing	48,400	15.8%
Willamette Valley	5+ units	68,628	22.4%
Willamette Valley	Mobile home/other	16,433	5.4%

Figure 22: Existing Housing Stock by Housing Type Mix and City Size (distributions of city %s)

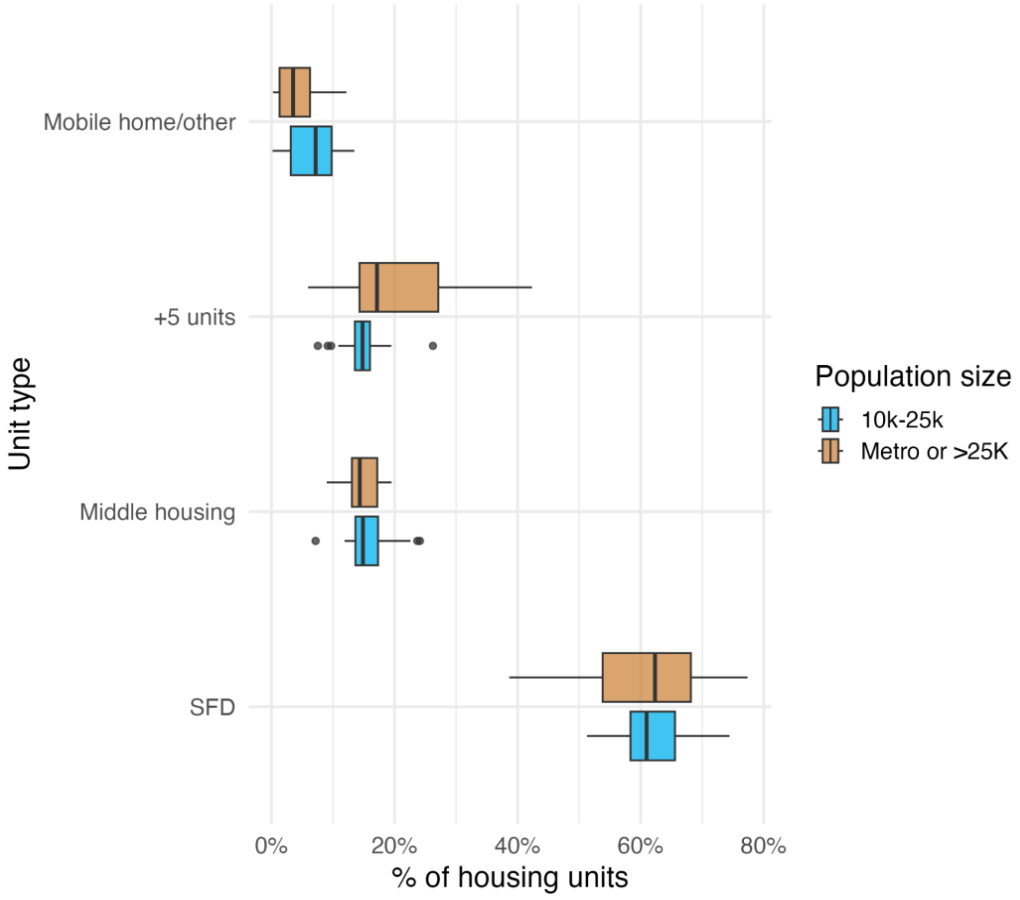
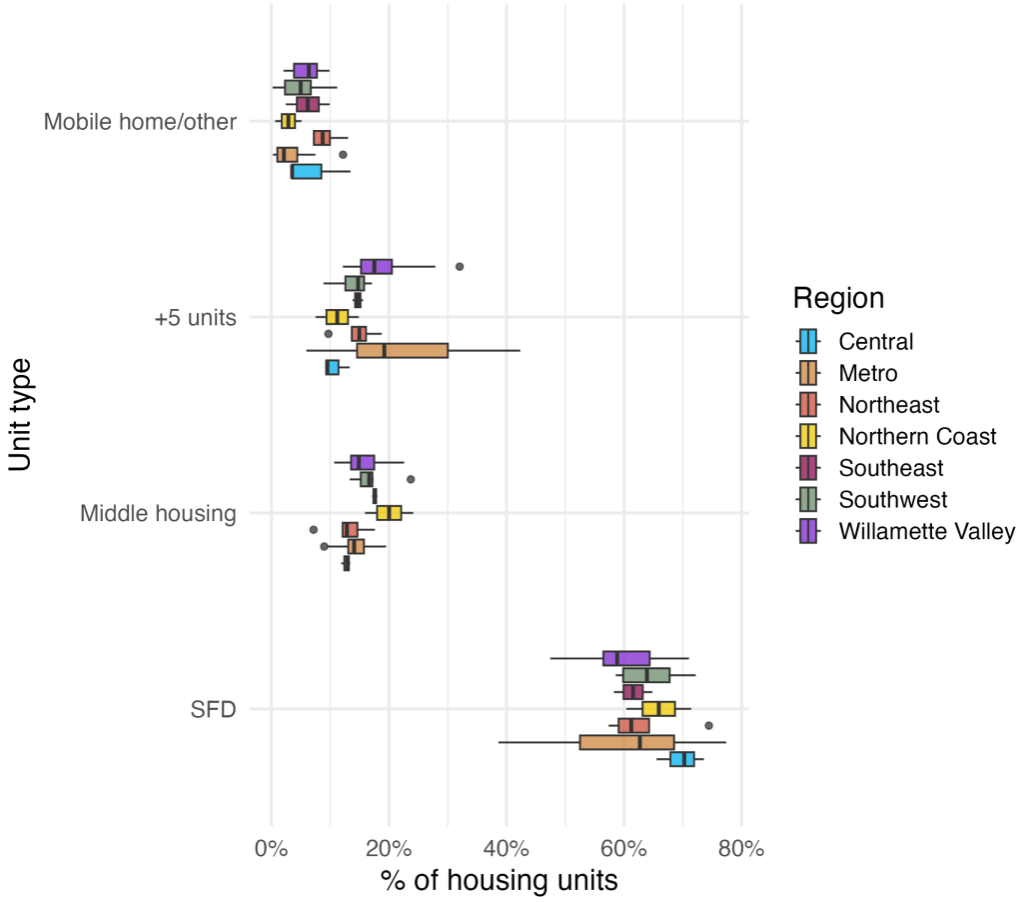


Figure 23: Existing Housing Stock by Housing Type Mix and OHNA Region (distributions of city %s)



2d) New construction for-sale affordability

Prompt: Analyze affordability of new for-sale housing from sales transactions compared to AMI, analyze by OHNA region and city size

Data source: Property Radar, home sales since 2018 for the state of Oregon of units built 2018 or later. Includes all housing types, including condos.

Limitations: Affordability was calculated based on current estimated home value as of May 2025 to reflect changes in price for older sales transactions and since some transactions have a sales value that may be inaccurate, such as sales of vacant lots / home sites prior to the construction of the home, non-arms-length transactions, etc. Affordability calculations use the same approach used by HUD for CHAS data: "The owner affordability estimates in the CHAS data use a ratio of 3.36—that is, a household could afford to purchase a home if the home's value is less than or equal to 3.36 of the household's household-size-adjusted income. This factor is based on terms for FHA-insured mortgages: 31% monthly payment standard, 96.5% loan-to-value ratio, 5.5% interest rate, 1.75% upfront insurance premium, .55% annual insurance premium, and 2% annual taxes and hazard insurance." Affordability calculations are not adjusted for HOA dues. Calculations are scaled by bedroom count using HUD's CHAS methodology (units with 3 or more bedrooms use a single

adjustment factor). The current mortgage interest rates are higher than what is reflected in the CHAS methodology, therefore affordability is being overstated in this data–if higher mortgage rates were modeled, housing would be broadly less affordable at all levels of income. All housing types are grouped together because townhouses and other middle housing are not reliably coded in the data.

Potentially reliable patterns by region and/or city size: The majority of new for-sale housing is affordable only to households earning greater than 120% of AMI across the state; however, there are small variations by city size and larger variations by region.

- City size: For smaller cities, a slightly larger percentage of new for-sale housing units are estimated to be affordable at 80-100% of AMI compared to in cities >25k and Metro jurisdictions, while a slightly smaller percentage are affordable at >120% of AMI. Other differences are negligible.
- Region:
    - In the Metro and Willamette Valley regions there is a similar distribution of new homes by affordability level, with 85-90% of new homes affordable at >120% of AMI and nearly all others affordable at 100-120% AMI. Both regions have a large number of transactions, making this estimate fairly reliable.
    - In the Central and Southwest regions, over 95% of new for-sale homes appear to be affordable at >120% AMI—higher than in other regions. Nearly all other transactions are affordable at 100-120% AMI. Both of these regions have over 1,000 total transactions in the dataset, which may make this finding reliable. Several of the counties in these regions have lower AMIs compared to much of the state, which may be contributing to this pattern.
    - In the Northeast and Northern Coast, it appears that a higher share of new homes is affordable at 80-120% AMI; however, there are many fewer transactions, and this difference may not be reliable given the smaller sample size.
    - Southeast has under 100 total transactions in the dataset which does not allow for any meaningful analysis of patterns.

Figure 24: Home Sales by Affordability and City Size (% of new construction sales):

City Size	Area Median Income Level	Count of Homes Sold	Percent of Homes Sold
10k-25k	30-60%	1	0.04%
10k-25k	60-80%	18	0.70%
10k-25k	80-100%	107	4.18%
10k-25k	100-120%	300	11.72%
10k-25k	>120%	2,134	83.36%
Metro or >25K	0-30%	1	0.01%
Metro or >25K	30-60%	6	0.04%
Metro or >25K	60-80%	10	0.06%
Metro or >25K	80-100%	192	1.18%

City Size	Area Median Income Level	Count of Homes Sold	Percent of Homes Sold
Metro or >25K	100-120%	1,884	11.55%
Metro or >25K	>120%	14,214	87.17%

Figure 25: Home Sales by Affordability and OHNA Region (% of new construction sales):

Region	Area Median Income Level	Count of Homes Sold	Percent of Homes Sold
Central	0-30%	0	0
Central	30-60%	0	0
Central	60-80%	1	0.1%
Central	80-100%	0	0
Central	100-120%	40	3.7%
Central	>120%	1,049	96.2%
Metro	0-30%	0	0
Metro	30-60%	1	0.0%
Metro	60-80%	3	0.0%
Metro	80-100%	150	1.5%
Metro	100-120%	1,291	12.9%
Metro	>120%	8,530	85.5%
Northeast	0-30%	0	0
Northeast	30-60%	0	0
Northeast	60-80%	17	3.1%
Northeast	80-100%	75	13.5%
Northeast	100-120%	150	27.0%
Northeast	>120%	314	56.5%
Northern Coast	0-30%	0	0
Northern Coast	30-60%	0	0
Northern Coast	60-80%	0	0
Northern Coast	80-100%	20	12.0%
Northern Coast	100-120%	70	41.9%
Northern Coast	>120%	77	46.1%
Southeast	0-30%	0	0
Southeast	30-60%	0	0

Region	Area Median Income Level	Count of Homes Sold	Percent of Homes Sold
Southeast	60-80%	0	0
Southeast	80-100%	5	7.7%
Southeast	100-120%	4	6.2%
Southeast	>120%	56	86.2%
Southwest	0-30%	0	0
Southwest	30-60%	0	0
Southwest	60-80%	0	0
Southwest	80-100%	6	0.4%
Southwest	100-120%	42	2.8%
Southwest	>120%	1,448	96.8%
Willamette Valley	0-30%	1	0.0%
Willamette Valley	30-60%	6	0.1%
Willamette Valley	60-80%	7	0.1%
Willamette Valley	80-100%	43	0.8%
Willamette Valley	100-120%	587	10.6%
Willamette Valley	>120%	4,874	88.3%

Figure 26: Recent Home Sales by Affordability and City Size (distribution of city %s)

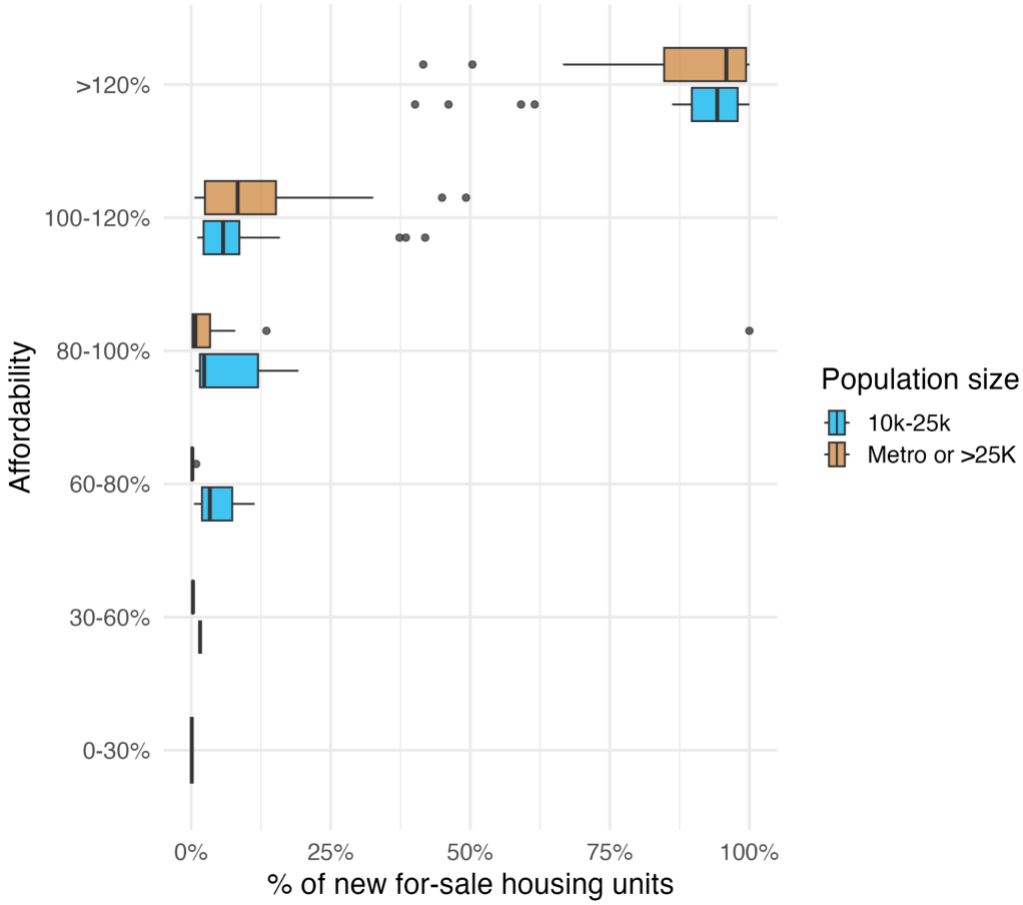
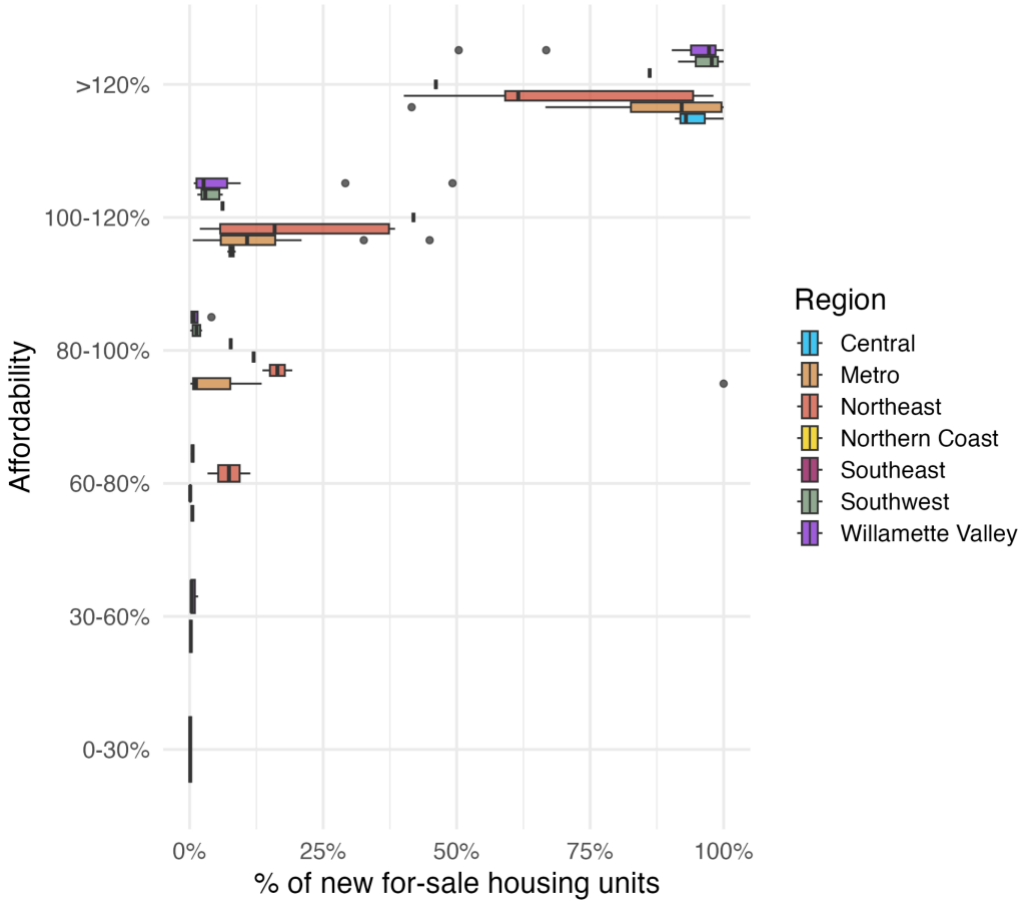


Figure 27: Recent Home Sales by Affordability and OHNA Region (distributions of city %s)



2e) New construction market rate multi-unit rental housing affordability

Prompt: Analyze affordability of new market-rate multi-unit rental housing from CoStar compared to AMI, analyzed by OHNA region and city size

Data source: CoStar proprietary data as of Q4 2024, records for all market-rate multi-unit rental housing included within CoStar's inventory (see limitations) built since 2018 (Using HUD 2024 AMI limits by county).

Limitations: Not all development is included in CoStar; smaller developments are more likely to be missed. Many developments are missing rent data. Reported asking rents reflect an average by unit type (e.g., studio, 1BR, 2BR, etc.) for the development. Separation of market-rate vs. affordable housing is based on CoStar's categorization, which is not always accurate. To convert from average asking rents by unit type to % AMI, ECOnorthwest estimated the additional utility costs based on a ratio between "gross rent" (including utilities) and "net rent" (excluding utilities) from PUMS and applied this ratio to the reported asking rents from CoStar. For each development in CoStar, ECOnorthwest calculated a blended average % AMI affordability level based on a weighted average of the % AMI for each unit type and the share of those units in the development.

Potentially reliable patterns by region and/or city size: Overall, statewide, the majority of new multi-unit rental housing (65-70%) is affordable at between 80-120% of AMI. There are some differences by city size and region, though they may not be reliable:

- **City size:** Differences by city size are relatively subtle. Smaller cities have a slightly higher share of new multi-unit rental housing that is affordable at >120% of AMI compared to larger and Metro jurisdictions and a slightly lower percentage affordable at 100-120% of AMI. There is substantial variation at the city level within these groupings.
- **Region:**
    - Estimates for some regions—Northeast, Northern Coast, and Southeast—are based on few observations and are unlikely to be reliable.
    - Differences between other regions are more likely to be reliable based on the number of observations; however, the imprecision inherent in the approach means that these differences may be overstated, and the variation within regions is substantial.

Figure 28: New Market Rate Multi-Unit Rental Housing by Affordability Level and City Size (% of new construction rentals):

City Size	Area Median Income Level	New Rental Units	Percent New Rental Units
10k-25k	30-60%	19	1.2%
10k-25k	60-80%	277	17.9%
10k-25k	80-100%	712	46.1%
10k-25k	100-120%	283	18.3%
10k-25k	>120%	254	16.4%
Metro or >25K	30-60%	277	0.8%
Metro or >25K	60-80%	6,036	18.1%
Metro or >25K	80-100%	14,709	44.2%
Metro or >25K	100-120%	8,262	24.8%
Metro or >25K	>120%	3,974	11.9%

Figure 29: New Market Rate Multi-Unit Rental Housing by Affordability Level and OHNA Region (% of new construction rentals):

Region	Area Median Income Level	New Rental Units	Percent New Rental Units
Central	30-60%	0	0.0%
Central	80-100%	1,589	61.4%
Central	100-120%	786	30.3%
Central	>120%	215	8.3%

Region	Area Median Income Level	New Rental Units	Percent New Rental Units
Metro	30-60%	241	1.0%
Metro	60-80%	5,228	22.6%
Metro	80-100%	11,110	48.0%
Metro	100-120%	3,741	16.2%
Metro	>120%	2,829	12.2%
Northeast	30-60%	0	0
Northeast	60-80%	144	80.0%
Northeast	80-100%	36	20.0%
Northeast	100-120%	0	0
Northeast	>120%	0	0
Northern Coast	30-60%	0	0
Northern Coast	60-80%	0	0
Northern Coast	80-100%	168	100.0%
Northern Coast	100-120%	0	0
Northern Coast	>120%	0	0
Southeast	30-60%	19	47.5%
Southeast	60-80%	21	52.5%
Southeast	80-100%	0	0
Southeast	100-120%	0	0
Southeast	>120%	0	0
Southwest	30-60%	0	0.0%
Southwest	60-80%	250	23.5%
Southwest	80-100%	200	18.8%
Southwest	100-120%	369	34.7%
Southwest	>120%	245	23.0%
Willamette Valley	30-60%	36	0.5%
Willamette Valley	60-80%	670	8.8%
Willamette Valley	80-100%	2,318	30.5%
Willamette Valley	100-120%	3,649	47.9%

Region	Area Median Income Level	New Rental Units	Percent New Rental Units
Willamette Valley	>120%	939	12.3%

Figure 30: New Market Rate Multi-unit Rental Housing by Affordability Level and OHNA Region

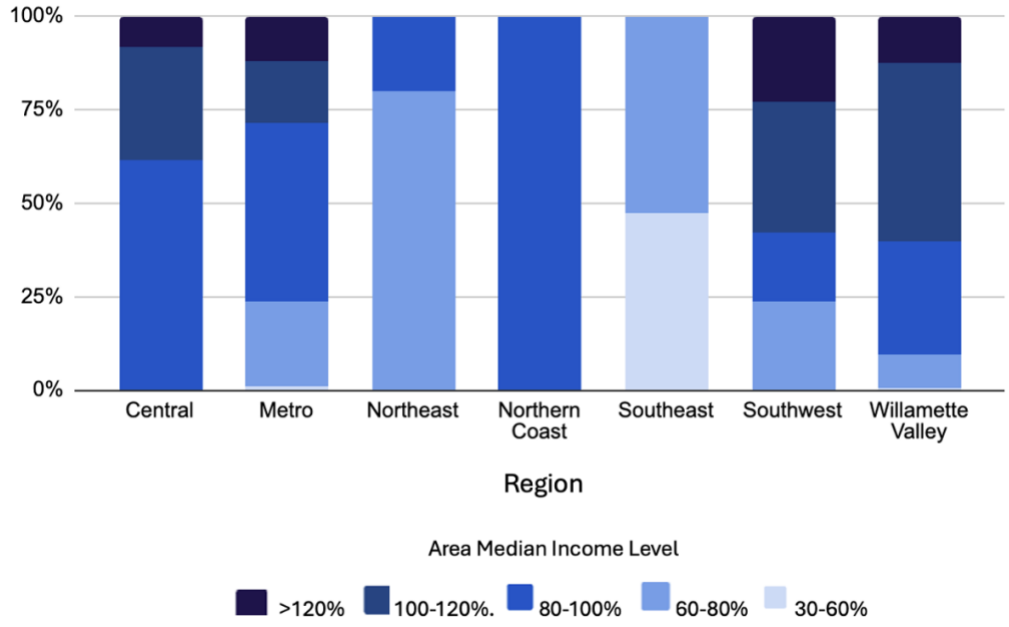


Figure 31: New Market Rate Multi-unit Rental Housing by Affordability Level and OHNA Region (distributions of city %s)

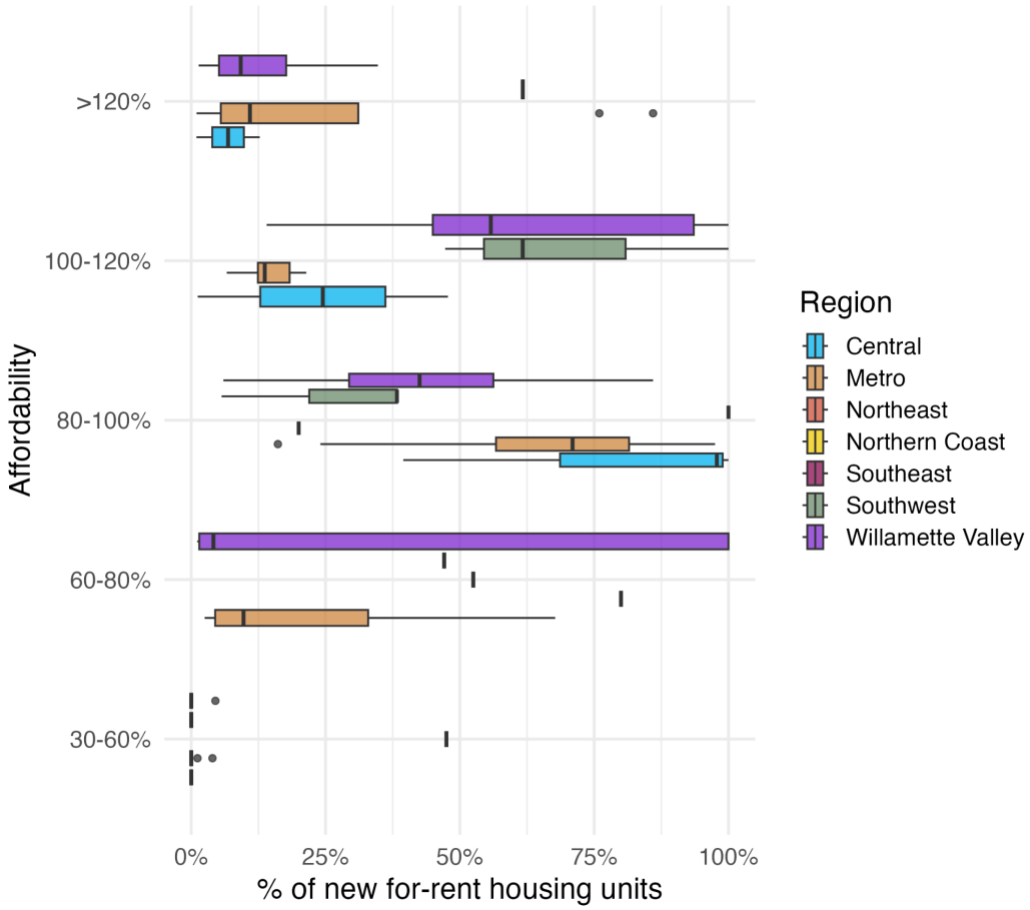


Figure 32: New Market Rate Multi-unit Rental Housing Units by Affordability Level by City

CITY	REGION	SIZE GROUP	NEW UNITS 30-60%	NEW UNITS 60-80%	NEW UNITS 80-100%	NEW UNITS 100-120%	NEW UNITS >120%
Prineville	Central	10k-25k	0	0	135	0	0
Pendleton	Northeast	10k-25k	0	144	36	0	0
St. Helens	Northern Coast	10k-25k	0	0	168	0	0
Klamath Falls	Southeast	10k-25k	19	21	0	0	0
Roseburg	Southwest	10k-25k	0	0	0	89	0
Ashland	Southwest	10k-25k	0	0	18	29	0
Central Point	Southwest	10k-25k	0	0	152	0	245
Lebanon	Willamette Valley	10k-25k	0	0	147	24	0

CITY	REGION	SIZE GROUP	NEW UNITS 30-60%	NEW UNITS 60-80%	NEW UNITS 80-100%	NEW UNITS 100-120%	NEW UNITS >120%
Dallas	Willamette Valley	10k-25k	0	32	0	0	0
Cottage Grove	Willamette Valley	10k-25k	0	80	0	0	0
Newport	Willamette Valley	10k-25k	0	0	0	66	0
Independence	Willamette Valley	10k-25k	0	0	56	75	9
Bend	Central	Metro or >25K	0	0	641	776	207
Redmond	Central	Metro or >25K	0	0	813	10	8
Portland	Metro	Metro or >25K	151	3752	4727	2378	1981
Gresham	Metro	Metro or >25K	0	699	306	71	0
Hillsboro	Metro	Metro or >25K	90	138	1448	484	120
Beaverton	Metro	Metro or >25K	0	100	1041	311	0
Tigard	Metro	Metro or >25K	0	61	454	77	35
Lake Oswego	Metro	Metro or >25K	0	0	0	89	545
Oregon City	Metro	Metro or >25K	0	21	552	130	7
Tualatin	Metro	Metro or >25K	0	0	145	14	0
Forest Grove	Metro	Metro or >25K	0	135	319	0	0
Happy Valley	Metro	Metro or >25K	0	24	789	125	0
Milwaukie	Metro	Metro or >25K	0	0	391	62	32
Sherwood	Metro	Metro or >25K	0	0	25	0	79
Canby	Metro	Metro or >25K	0	12	23	0	0
Troutdale	Metro	Metro or >25K	0	18	386	0	0
Sandy	Metro	Metro or >25K	0	5	195	0	0
Fairview	Metro	Metro or >25K	0	137	279	0	0

CITY	REGION	SIZE GROUP	NEW UNITS 30-60%	NEW UNITS 60-80%	NEW UNITS 80-100%	NEW UNITS 100-120%	NEW UNITS >120%
Molalla	Metro	Metro or >25K	0	126	30	0	30
Medford	Southwest	Metro or >25K	0	250	30	251	0
Eugene	Willamette Valley	Metro or >25K	0	31	139	1348	808
Salem	Willamette Valley	Metro or >25K	0	21	1127	714	26
Springfield	Willamette Valley	Metro or >25K	0	0	0	261	0
Corvallis	Willamette Valley	Metro or >25K	0	0	0	17	0
Albany	Willamette Valley	Metro or >25K	36	12	63	594	96
Keizer	Willamette Valley	Metro or >25K	0	12	131	148	0
McMinnville	Willamette Valley	Metro or >25K	0	221	0	0	0
Woodburn	Willamette Valley	Metro or >25K	0	18	515	402	0
Newberg	Willamette Valley	Metro or >25K	0	243	140	0	0

2f) Housing type mix of recent affordable housing production

Prompt: Housing mix of affordable housing production: Analyze data provided by OHCS.

Data source: Data provided by OHCS reflecting 4% and 9% LIHTC deals that reached financial closing (meaning that underwriting is complete and financial documents have been signed) from 2020-2025. The data also covers LIFT-funded developments but excludes smaller grant/loan/tax credit deals (like GHAP, HDGP, OAHTC, and others). It includes only Multifamily Residential Rental properties and homeownership development, with both single site properties and scattered site developments.

Limitations: The data provided does not include all affordable housing funded by the state, as certain funding programs are excluded. Housing type is not consistently described within the data in a way that aligns with typical housing type definitions. Instead, housing type was assumed based on the identified "Property Use" as either "multi-unit Residential Rental" or "Single Family Homeownership". Some of both categories may take the shape of middle housing development.

Potentially reliable patterns by region and/or city size: The majority of the recently produced affordable housing units have been multi-unit residential units. Single family home units account for a larger share of total units in Metro and 25k plus cities. They account for just over 25% of the units in the Central region.

Figure 33: Recent Affordable Housing Developments by Housing Type and City Size

City Size	Property Use	Total Units	Share of Region Units
10k-25k	Multi-unit Residential Rental	1,330	99%
10k-25k	Single Family Homeownership	20	1%
Metro or >25K	Multi-unit Residential Rental	9,176	94%
Metro or >25K	Single Family Homeownership	606	6%

Figure 34: Recent Affordable Housing Developments by Housing Type and OHNA Region:

Region	Property Use	Total Units	Share of Region Units
Central	Multi-unit Residential Rental	761	72%
Central	Single Family Homeownership	292	28%
Metro	Multi-unit Residential Rental	6,635	97%
Metro	Single Family Homeownership	201	3%
Northeast	Multi-unit Residential Rental	292	100%
Northern Coast	Multi-unit Residential Rental	321	100%
Southeast	Multi-unit Residential Rental	200	100%
Southwest	Multi-unit Residential Rental	516	90%
Southwest	Single Family Homeownership	58	10%
Willamette Valley	Multi-unit Residential Rental	1,781	96%
Willamette Valley	Single Family Homeownership	75	4%

Figure 35: Recent Affordable Housing Developments by Housing Type and City Size

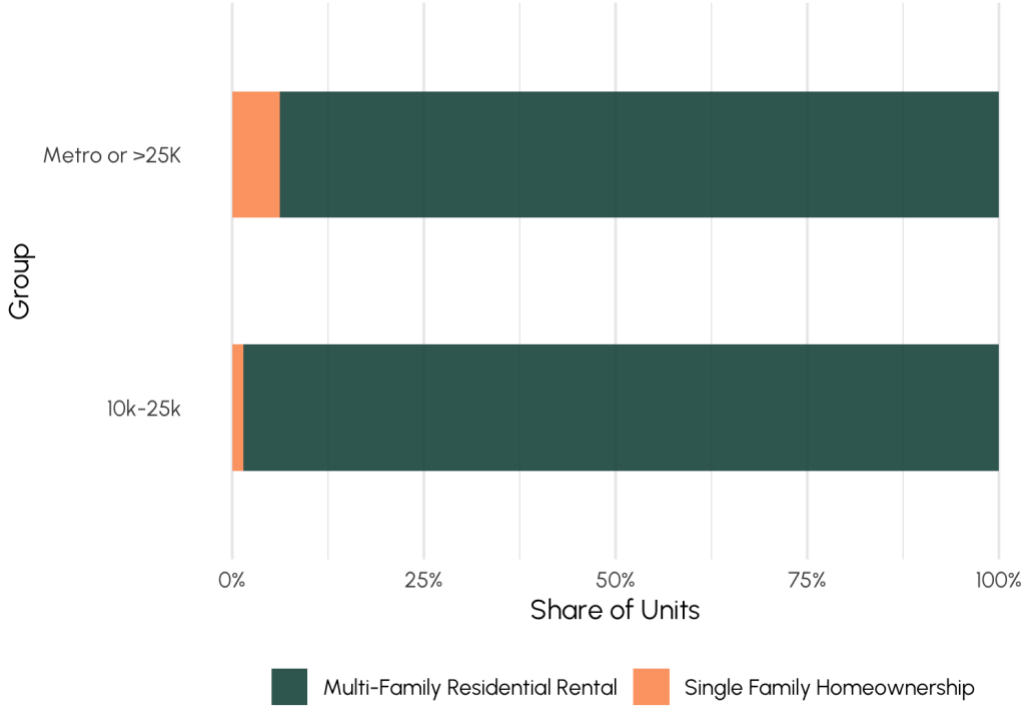


Figure 36: Recent Affordable Housing Developments by Housing Type and OHNA Region

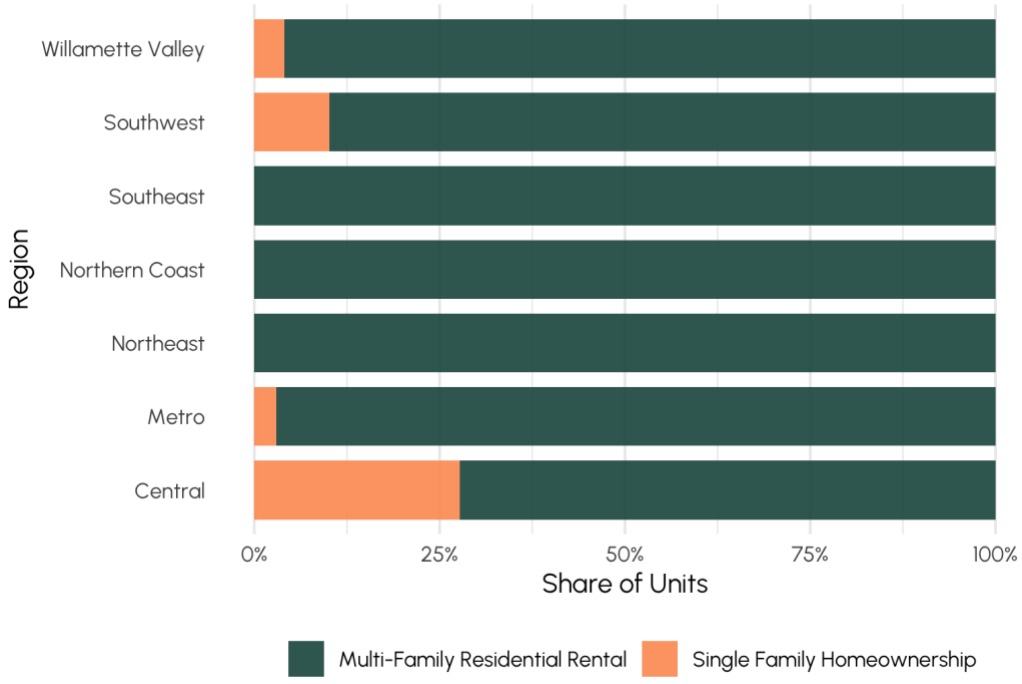
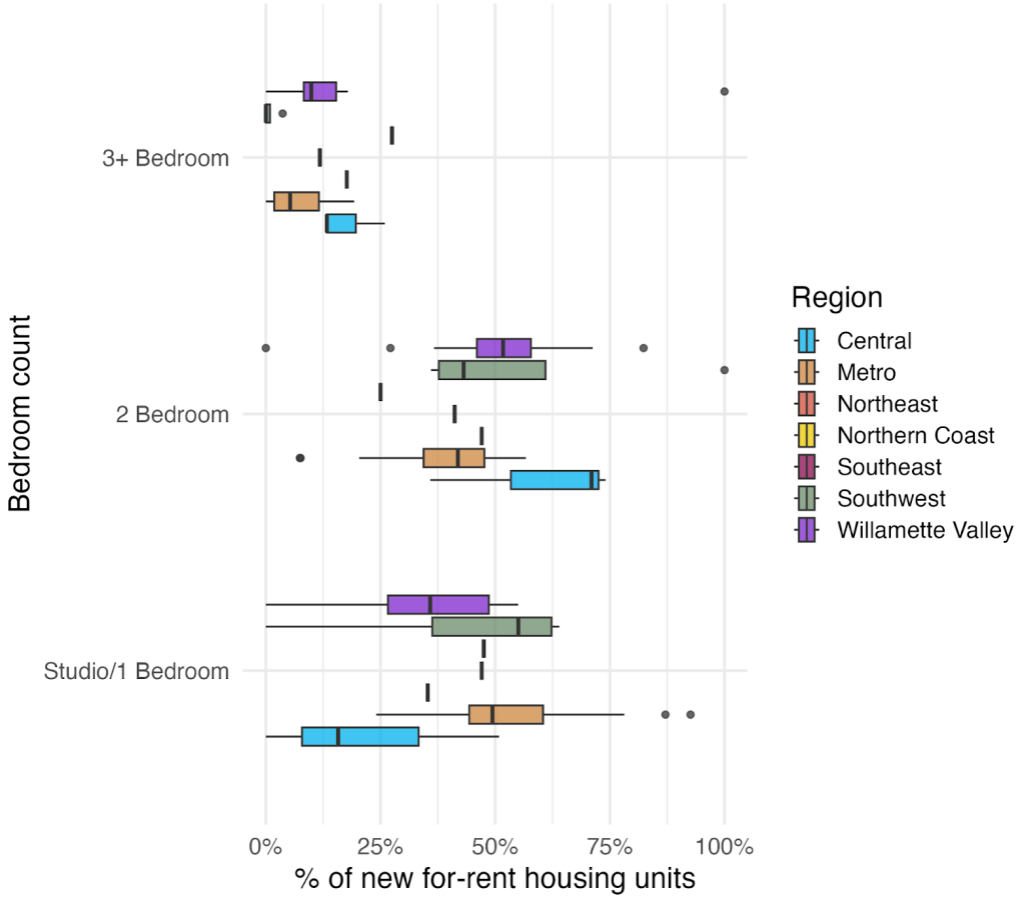


Figure 37: Recent Affordable For-Rent Housing Units by Bedroom Count and OHNA Region



Unit Size

Unit Size Qualitative Assessment of Impact

Question: How might unit size / bedroom count metrics impact zoning, land use actions, or other choices a city might take to advance the policy objectives?

The state is considering developing a compliance pathway for unit size (bedroom count) as part of the definition of "needed housing" in each city's CHN. The state's rules already require cities to evaluate unit size and bedroom count, but this new compliance pathway would provide specific "off the shelf" measures that could be used as (or potentially be required to be used as) a quantitative reference point in that assessment of needed housing.

As a broad generalization, ECO's analysis finds that new and existing for sale housing is much more likely to have three or more bedrooms, while new and existing for rent housing is more likely to be studio/1 bedroom and 2-bedroom units. Meanwhile, household sizes are often larger for lower income households that are likely to be renters, creating a mismatch between stock and units available. CHN compliance pathways that seek to

overcome this mismatch would presumably aim for a larger share of multi-unit units (which are more likely to be rental units) to have two or more bedrooms than is currently available in existing or newly constructed housing stock. However, the pathway from this quantitative requirement to action is limited, as cities don't typically regulate bedroom count.

INTERACTION WITH THE HCA / LAND USE EFFICIENCY

Findings of needed housing by unit size affect the HCA indirectly if at all. One possibility is that HCAs would recognize that for sale product (generally single-unit detached) is more likely to provide larger / higher bedroom count units, which could influence unit mix assumptions in the CHN and land capacity assessment in the HCA. More likely, though, quantitative definitions of need for larger bedroom count would have no impact on the HCA or land use efficiency choices.

INTERACTION WITH THE HPS / ACTION SELECTION

Cities are already considering unit size and bedroom count in their CHNs as part of their definition of needed housing and are required to tie action selection to that need. It is unclear how adding a quantitative compliance pathway would change the type or number of relevant actions selected, with the possible exception of increasing focus on this issue.

There is no easily available regulatory authority that would allow cities to enforce a policy that required particular bedroom counts, and the administrative challenge of such a policy would discourage implementation. If jurisdictions did try to regulate unit size mix, the inability to set unit mix based on market conditions that respond to demand from the target market could discourage development overall, or for the housing type(s) impacted.

It is more likely that jurisdictions would adopt regulatory incentives to encourage larger units. If the need were expressed as a share of all need (e.g., need for 3+ bedroom units generally) rather than being linked to a housing type (e.g., need for 3+ bedroom multiunit housing units), it could create an inadvertent incentive for larger single-unit detached homes. Even if linked to housing type but not affordability, incentives for larger multi-unit housing units could create perverse incentives to produce large, expensive units (e.g., townhouse-style rentals, large penthouse units, etc.).

It is possible that providing access to these metrics would decrease the amount of analytical effort for cities.

ADDITIONAL CONSIDERATIONS

- Our analysis found consistency across city size and region for bedroom count for for-sale product, but patterns are much harder to discern in for-rent products because of limited data availability in smaller cities and more rural areas. This suggests that a consistent statewide compliance pathway could be possible.

LIKELY MARKET / POLICY RESPONSE TO LOW- OR HIGH-END THRESHOLDS (INCLUDING UNINTENDED CONSEQUENCES)

Without city action, a compliance pathway in the CHN has no impact on production outcomes because, regardless of the aggressiveness of the compliance pathway that might be selected (high or low), developers

are unlikely to read the CHN document and change their assessment of their product. A compliance pathway on bedroom count or unit size would only have an impact on production if it increases jurisdictional focus on this issue. However, again, it's unclear that adding a specific compliance pathway with a quantitative requirement increases the likelihood that cities will take action beyond what might occur under current rules.

Some city actions could have unintended consequences.

If cities attempted to *require* developers to construct units with bedroom counts that matched their CHN (and it is not clear that cities have the ability to do so), several outcomes are possible:

- Fewer units per building and lower overall unit production, as fewer units would fit in the building envelope
- Potentially reduced financial feasibility as per square foot rents drop, leading to lower overall production

Incentives for larger / higher bedroom count units, if not carefully designed, could drive market production toward more expensive rental types, reducing overall affordability. Producing apartments with higher bedroom counts in almost all cases reduces affordability due to the HUD guidance on affordability by unit type. For example, moving from a 1-bedroom apartment to a 2-bedroom apartment is equivalent to a 15% increase in AMI. There are almost no locations in the state where the new construction 2-bedroom rent is within 15% of 1 bedroom rent within a specific building, which is indicative of the marginal cost of producing a 2 bedroom being greater than 15%. The implication because the rent difference is greater than 15% when adding a bedroom, is that larger bedroom units are going to be less affordable (a higher AMI).

HCAs could hypothetically recognize that for-sale product (generally single-unit detached) is more likely to provide larger / higher bedroom count units, which could influence unit mix assumptions in the CHN. This would be mitigated through guidance or other compliance pathways on unit mix.

Additional Considerations

- Overall, it's unclear that this compliance pathway would result in substantially different outcomes for action selection in the CHN, over the current rules. At the same time, unintended consequences are relatively limited unless jurisdictions choose to implement firm regulatory actions around bedroom count.
- The state should consider a compliance pathway for bedroom count only if:
    - It is a critically important policy priority that the state believes deserves focused policy attention. Creating a compliance pathway would emphasize bedroom count as an equally important policy priority to all of the other topics of compliance pathways, and in some ways, it could be counter to other priorities (such as affordability).
    - It is the state's goal to decrease jurisdictional effort in completing its CHN. A compliance pathway would arguably save some limited effort in the CHN for cities that choose to use it.
- The state might have a greater overall impact on the availability of rental units with higher bedroom count by focusing on its stock of publicly funded affordable units. OHCS could provide additional

detail about the interaction of bedroom count with regulated affordable development feasibility and HUD funding requirements.

The state should consider future guidance about designing incentives for larger units, to help cities avoid creating incentives that reduce overall affordability. Cities may be interested in implementing these incentives whether or not the state chooses to design a compliance pathway about bedroom count.

Unit Size Data Appendix

1) Existing Housing Stock Unit Size

Prompt: What is the unit size distribution of all existing housing (rental and for-sale), and how does it vary by OHNA region and by city size?

Data source: ACS 5-year 2023

Limitations: Normal limitations associated with ACS data at this level of granularity - higher MOEs with smaller geographies and some regions have only 1-3 observations.

Potentially reliable patterns by region and/or city size: Little to no significant patterns by region. Medium-size town (10-25K) permits for 2-unit structures perhaps showing some distinction from Metro/+25K towns, though it is a very small portion of overall permits.

Figure 38: Existing Housing Stock by Unit Size and City Size (% of housing stock):

City Size	Bedroom Count	Count of Units	Percent of Units
10k-25k	Studio/1 Bedroom	19,820	14.2%
10k-25k	2 Bedroom	41,738	29.9%
10k-25k	3+ Bedroom	78,192	56.0%
Metro or >25K	Studio/1 Bedroom	178,488	18.2%
Metro or >25K	2 Bedroom	265,410	27.1%
Metro or >25K	3+ Bedroom	535,107	54.7%

Figure 39: Existing Housing Stock by Unit Size and OHNA Region (% of housing stock):

Region	Bedroom Count	Count of Units	Percent of Units
Central	Studio/1 Bedroom	6,546	10.0%
Central	2 Bedroom	14,754	22.6%
Central	3+ Bedroom	43,971	67.4%
Metro	Studio/1 Bedroom	125,077	21.1%
Metro	2 Bedroom	156,907	26.4%
Metro	3+ Bedroom	312,137	52.5%

Region	Bedroom Count	Count of Units	Percent of Units
Northeast	Studio/1 Bedroom	4,606	14.6%
Northeast	2 Bedroom	8,906	28.3%
Northeast	3+ Bedroom	17,997	57.1%
Northern Coast	Studio/1 Bedroom	1,242	11.7%
Northern Coast	2 Bedroom	3,433	32.3%
Northern Coast	3+ Bedroom	5,950	56.0%
Southeast	Studio/1 Bedroom	2,773	18.6%
Southeast	2 Bedroom	4,917	32.9%
Southeast	3+ Bedroom	7,248	48.5%
Southwest	Studio/1 Bedroom	12,962	13.6%
Southwest	2 Bedroom	28,663	30.0%
Southwest	3+ Bedroom	53,952	56.4%
Willamette Valley	Studio/1 Bedroom	45,102	14.7%
Willamette Valley	2 Bedroom	89,568	29.2%
Willamette Valley	3+ Bedroom	172,044	56.1%

Figure 40: Existing Housing Stock by Unit Size and City Size (distribution of city %s)

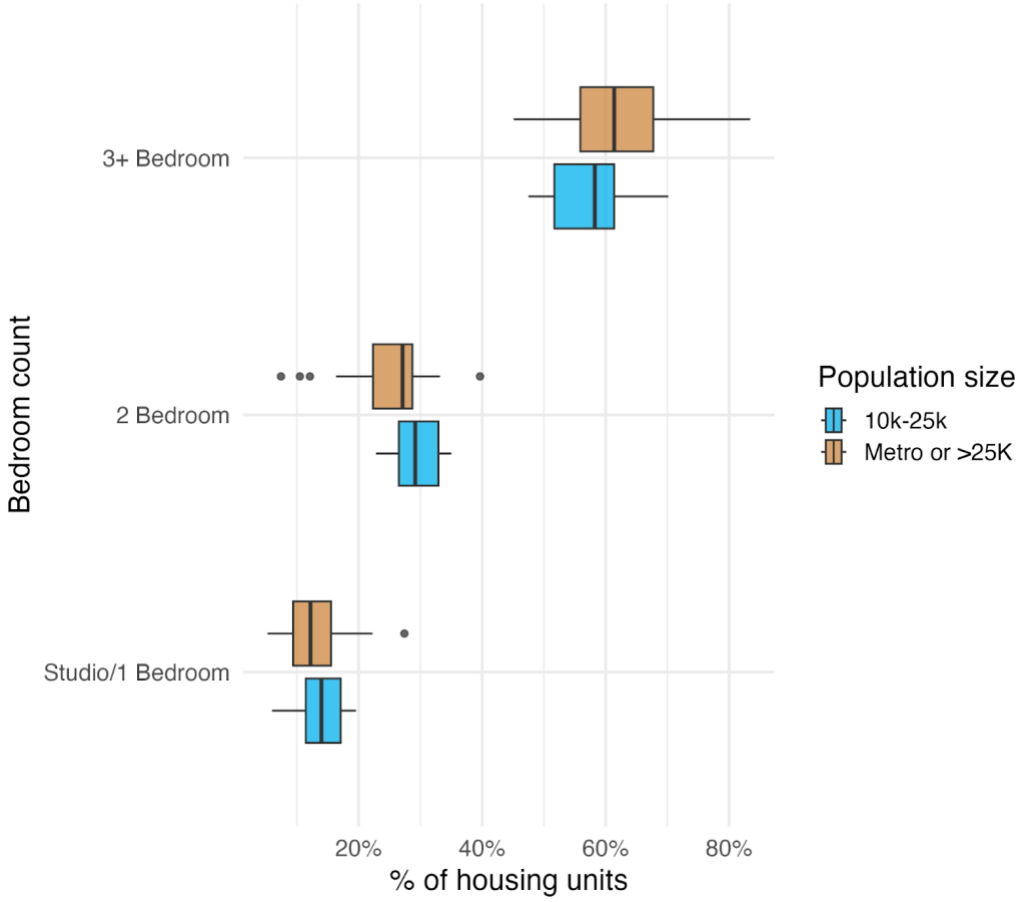
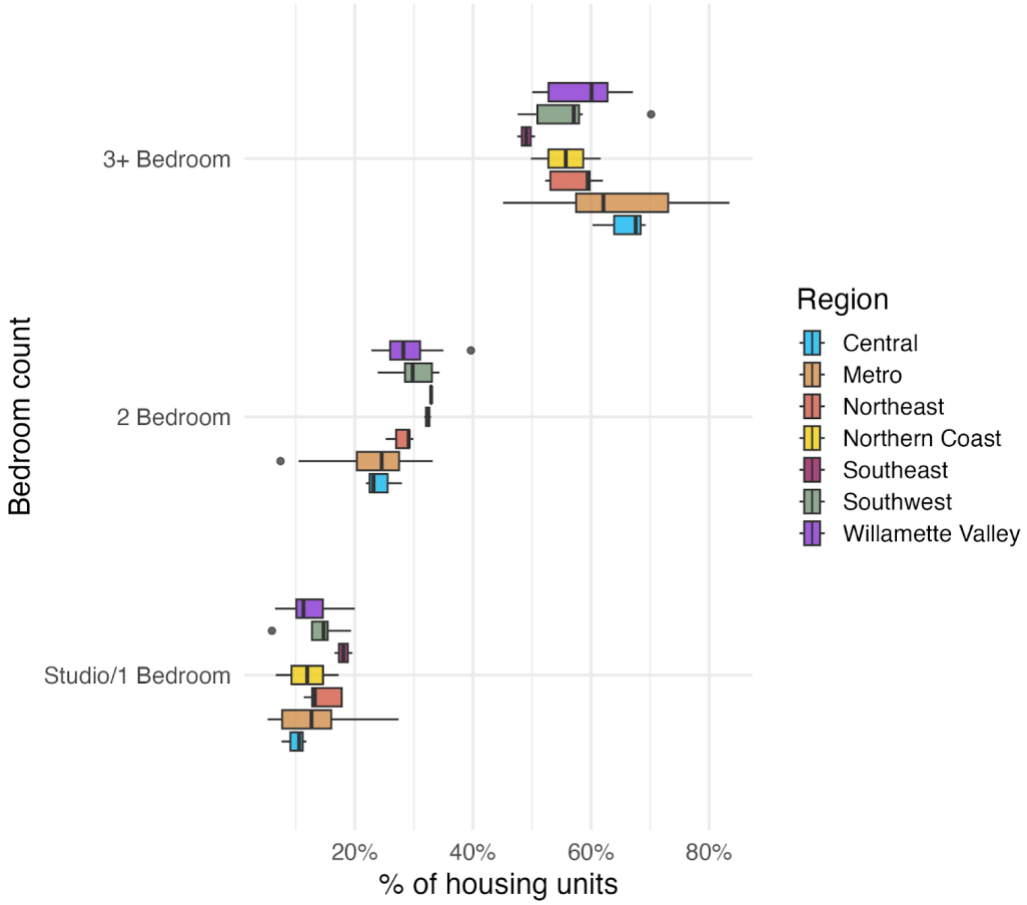


Figure 41: Existing Housing Stock by Unit Size and OHNA Region (distribution of city %s)



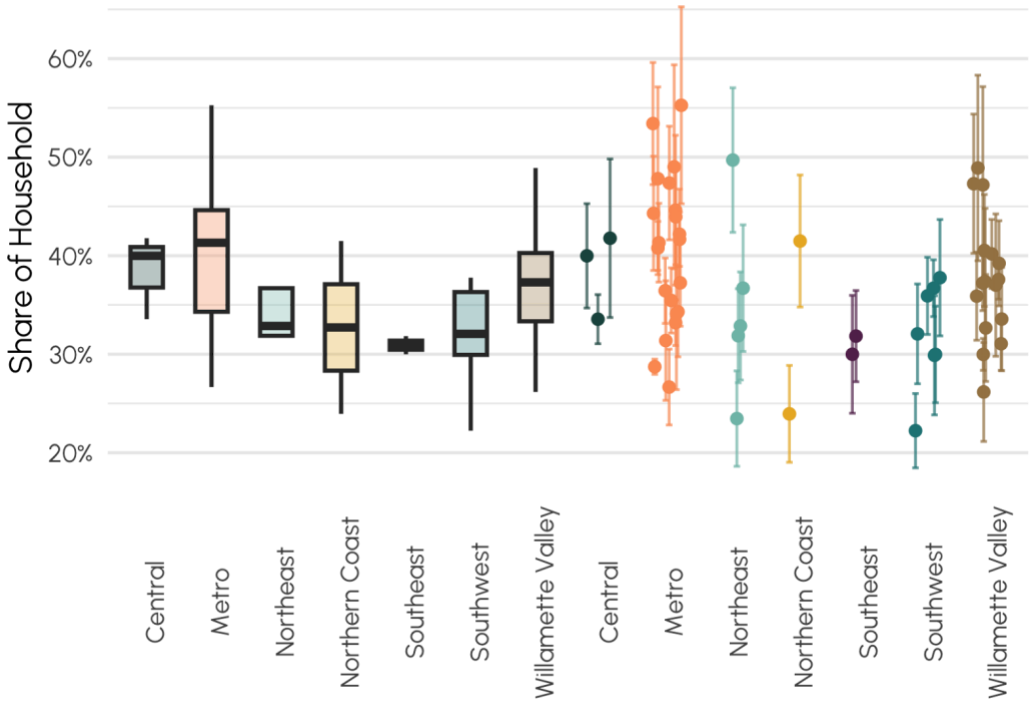
2) SHARE OF THREE PLUS PEOPLE HOUSEHOLD

Prompt: Provide city-level data for households and families with 3+ members from prior analysis

Data: 2023 ACS 5-Year estimates at the place level. Table B25009 provides tenure by household size. We summarize households of 3 or more people across tenure. This statistic includes all households (family and non-family combined)

Data Limitations: The data visualization uses point estimates to display the interquartile range by region or size. It is not possible to include the margin of error (MOE) for the estimate because each individual point has its own MOE, and including the MOE for each (while possible) would obscure the desired outcome of understanding the range and its midpoint. If you were to explore MOE per each point, it might increase the perceived variance by region. Figure 42 provides an example of how the box and whisker plot compares to the estimated distribution if the MOEs are included, for the sake of illustrating this situation.

Figure 42: Share of 3+ Member Households by OHNA Region and City



Some OHNA regions are made up of less than a handful of cities with populations greater than 10,000. The interquartile range (for the box and whisker plot) in such cases, simply visualizes the range of the few points.

Patterns: The Southeast region has a relatively low share of 3+ people households relative to other regions (even when MOEs are taken into consideration). The Southwest region follows a similar pattern but is less pronounced. The median share of 3+ people households is higher in the Metro relative to all other regions. This does not universally hold for all cities in the Metro. This pattern remains generally consistent for size (including Metro) as well.

Figure 43: Share of 3+ Member Households by City Size

City Size	Estimate	Margin of Error	Share	Share Margin of Error
10k-25k	43,782	1,645	33.7%	1.2%
Metro or >25K	322,461	4,639	34.6%	0.5%

Figure 44: Share of 3+ Member Households by OHNA Region

Region	Estimate	Margin of Error	Share	Share Margin of Error
Central	21,772	1,342	36%	2%
Metro	192,169	3,499	34%	1%

Region	Estimate	Margin of Error	Share	Share Margin of Error
Northeast	10,439	790	36%	3%
Northern Coast	3,285	420	33%	4%
Southeast	4,285	505	31%	4%
Southwest	30,296	1,482	34%	2%
Willamette Valley	103,997	2,632	35%	1%

Figure 45: Share of 3+ Member Households by City Size

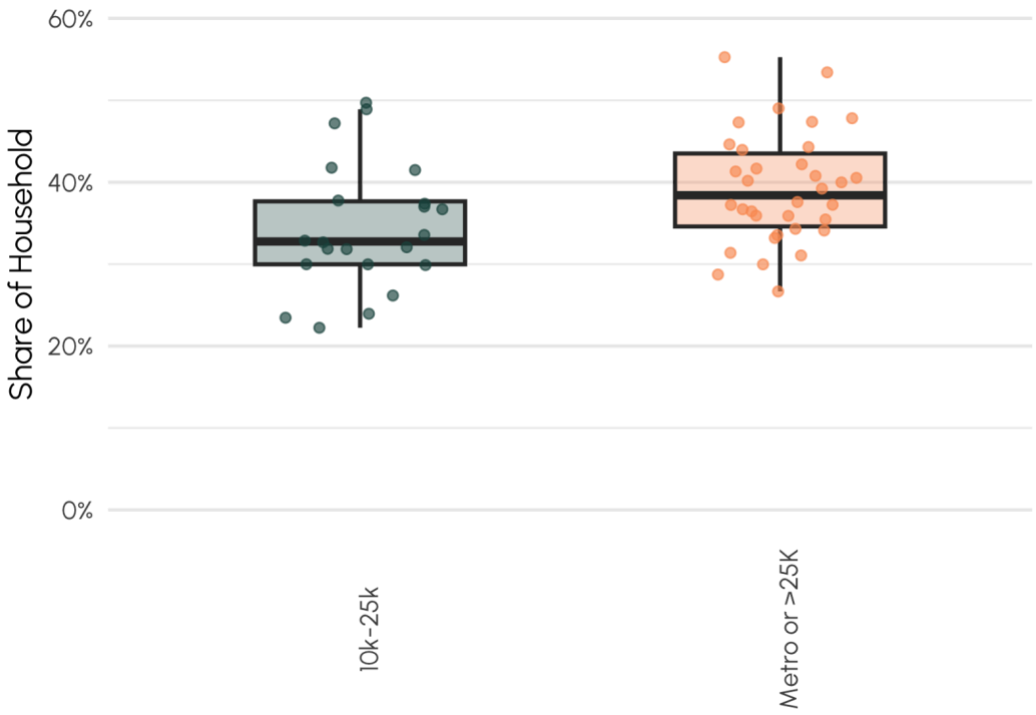
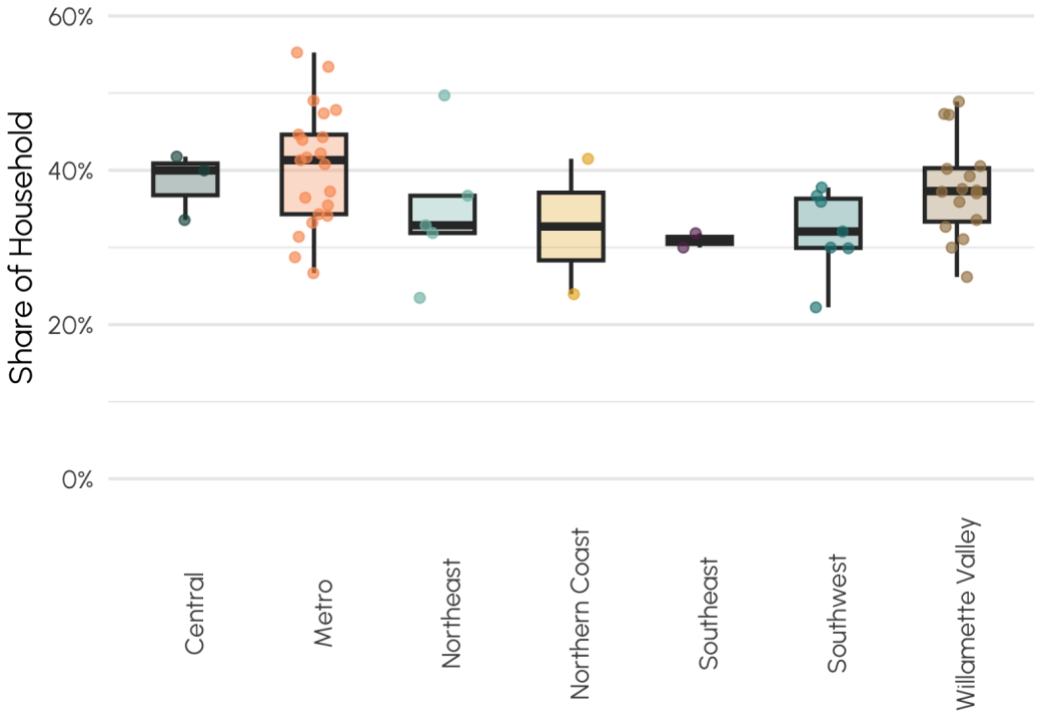
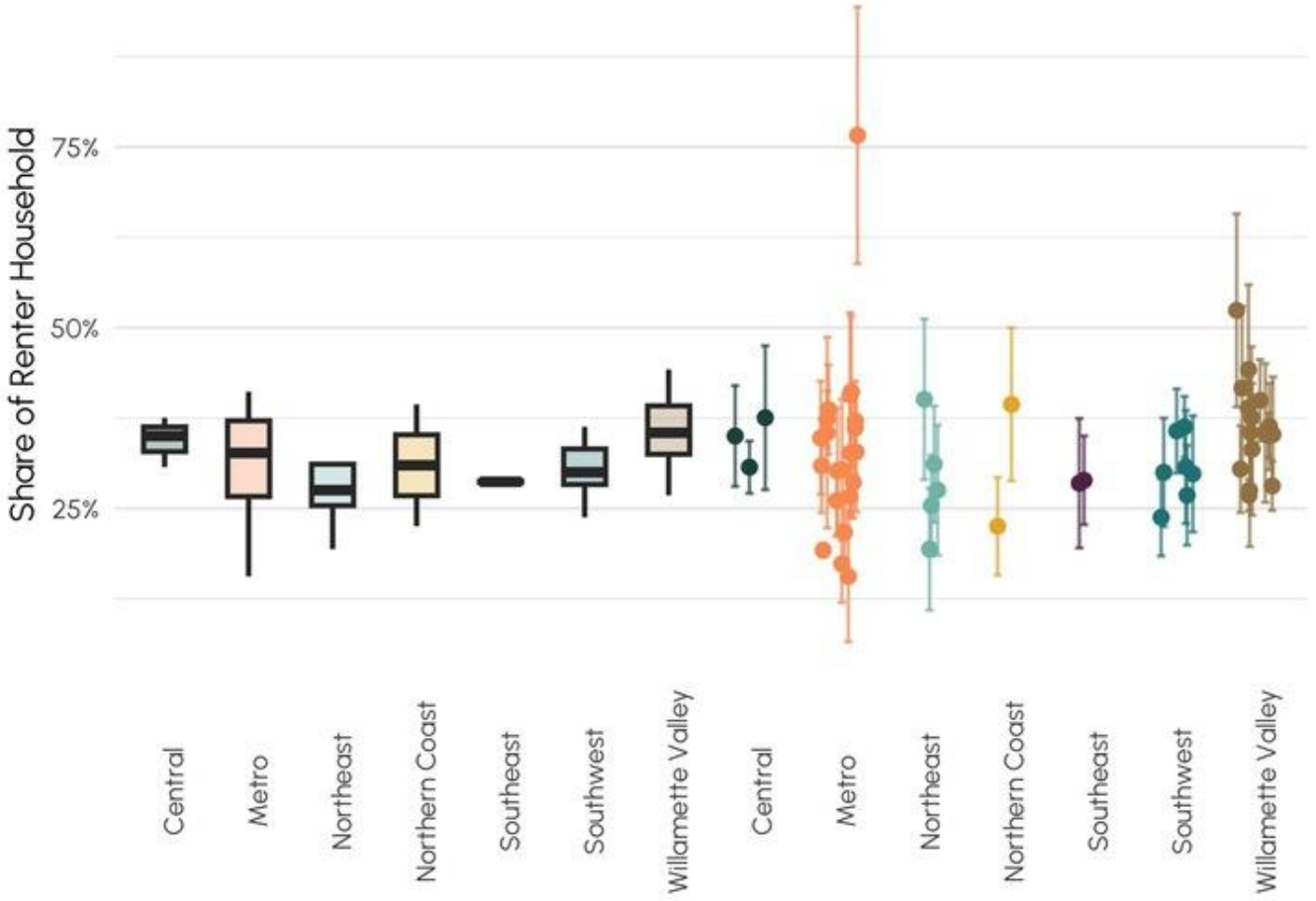


Figure 46: Share of 3+ Member Households by OHNA Region



Looking specifically at renter households, an average of around 25 - 30% of renter households have 3+ members, as shown in Figure 47.

Figure 47. Share of Renter Households with 3+ Members by OHNA Region and City



3) New construction for-sale unit size

Prompt: What is the unit size distribution of recently built housing (rental and for-sale), and how does it vary by OHNA region and by city size?

Data source: Property Radar, home sales since 2018 for the state of Oregon of units built 2018 or later. Includes all housing types, including condos.

Limitations: Bedroom count is based on the listing information; some listings may count bedrooms that do not meet all code requirements to be legal bedrooms as bedrooms.

Potentially reliable patterns by region and/or city size: Statewide, over 90% of new homes sold since 2018 have had 3 or more bedrooms. The same is true in aggregate for both city size categories and all regions. There are subtle differences by region but some stem from regions with smaller data sets.

Figure 48: Findings by New Construction For-Sale Housing by Unit Size and City Size (% of new construction sales)

City Size	Bedroom Count	Unit Sales	Percent of Sales
10k-25k	Studio/1 Bedroom	30	1.2%
10k-25k	2 Bedroom	189	7.4%
10k-25k	3+ Bedroom	2,341	91.4%
Metro or >25K	Studio/1 Bedroom	179	1.1%
Metro or >25K	2 Bedroom	1,162	7.1%
Metro or >25K	3+ Bedroom	14,966	91.8%

Figure 49: New Construction For-Sale Housing by Unit Size and OHNA Region (% of new construction sales)

Region	Bedroom Count	Unit Sales	Percent of Sales
Central	Studio/1 Bedroom	9	0.83%
Central	2 Bedroom	73	6.70%
Central	3+ Bedroom	1,008	92.48%
Metro	Studio/1 Bedroom	162	1.62%
Metro	2 Bedroom	829	8.31%
Metro	3+ Bedroom	8,984	90.07%
Northeast	Studio/1 Bedroom	5	0.90%
Northeast	2 Bedroom	16	2.88%
Northeast	3+ Bedroom	535	96.22%
Northern Coast	Studio/1 Bedroom	2	1.20%
Northern Coast	2 Bedroom	3	1.80%
Northern Coast	3+ Bedroom	162	97.01%
Southeast	Studio/1 Bedroom	1	1.54%
Southeast	2 Bedroom	5	7.69%
Southeast	3+ Bedroom	59	90.77%
Southwest	Studio/1 Bedroom	12	0.80%
Southwest	2 Bedroom	112	7.49%
Southwest	3+ Bedroom	1,372	91.71%
Willamette Valley	Studio/1 Bedroom	18	0.33%
Willamette Valley	2 Bedroom	313	5.67%

Willamette Valley	3+ Bedroom	5,187	94.00%

Figure 50: New Construction For-Sale Housing by Unit Size and City Size (distribution of city %s)

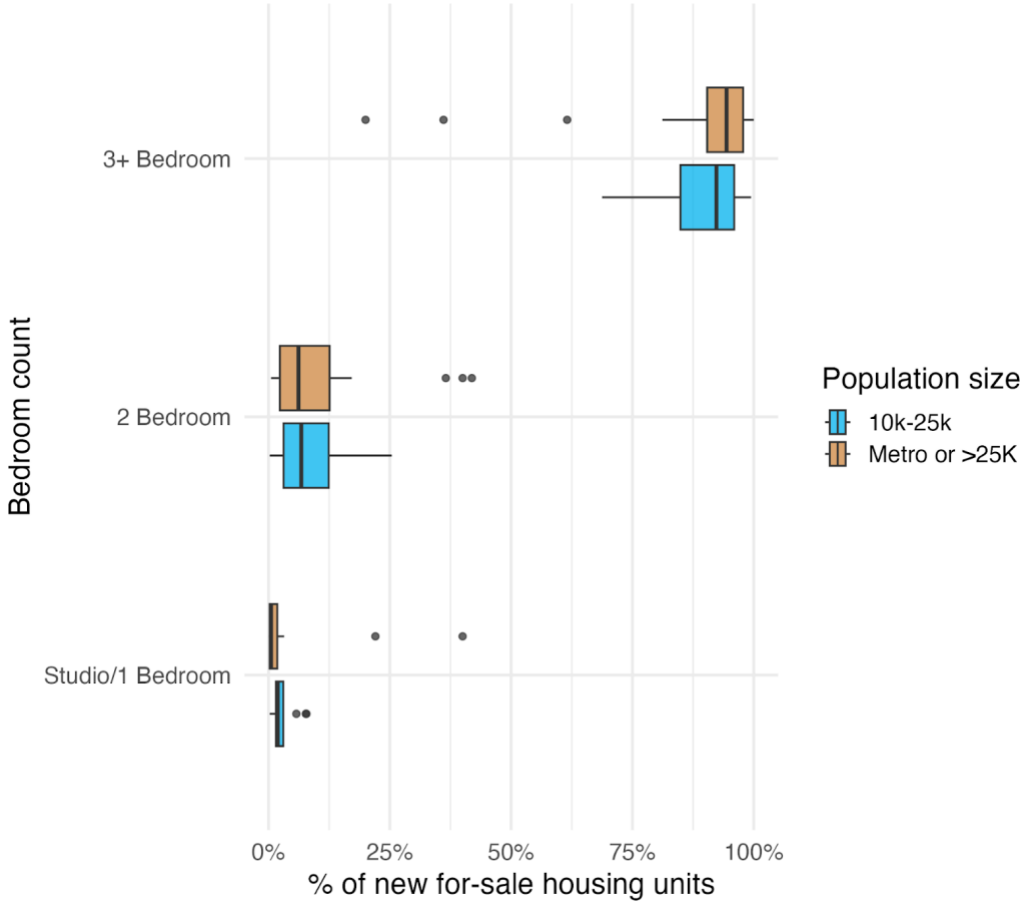
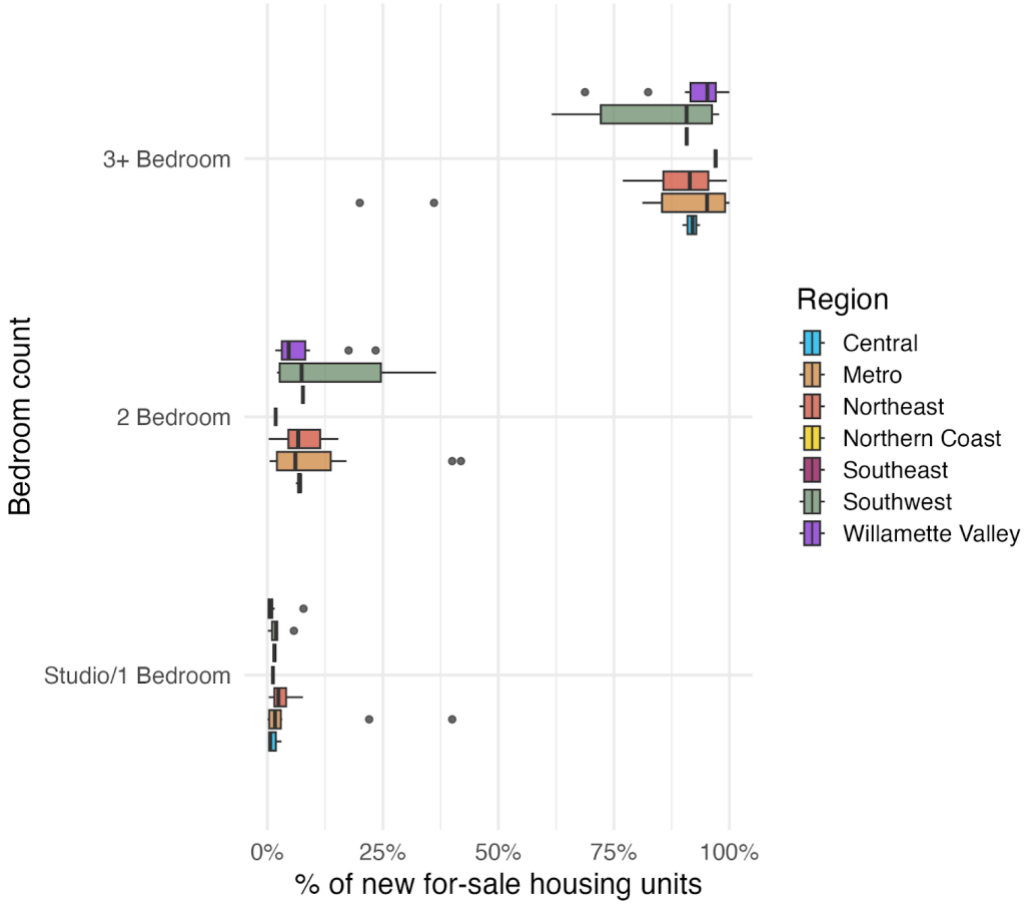


Figure 51: New Construction For-Sale Housing by Unit Size and OHNA Region (distribution of city %s)



4) New construction multi-unit rental housing unit size

Prompt: Analyze unit size (by bedroom) mix of new multi-unit rental housing from CoStar, analyze by OHNA region and city size

Data source: CoStar, multi-unit developments built since 2018

Limitations: Not all development is included in CoStar; smaller developments are more likely to be missed. Not all CoStar records list the number of units by unit size, though most newer developments do.

Potentially reliable patterns by region and/or city size: The vast majority (over 90% statewide) of new multi-unit rental housing is studio, 1- and 2-bedroom units, with less than 10% 3+-bedroom units in aggregate. This pattern is the inverse of the pattern exhibited with for-sale units.

- **City size:** The Metro/>25K grouping exhibits a higher share of production of studio/1-bedroom units (60% of all new rental production, compared to 44% for cities in the 10K-25K). However, at the city level, the pattern becomes less clear as the distribution of rental unit production within the Metro/>25K group shows little difference from the 10K-25K group at all unit type levels.
- **Region:**

- Estimates for some regions—Northeast, Northern Coast, and Southeast—are based on few observations and are less reliable, though CoStar data for unit size is more reliable in general than data on affordability.
- Among regions with more multiunit developments, Metro and Southwest have lower shares of 3+ Bedroom units (<5% in aggregate) than the Willamette Valley and Central regions (10-15%). However, there is substantial variability at the city level within each of the regions due to the smaller number of observations at those levels.

Figure 52: New Construction Multi-Unit Rental Housing by Unit Size and City Size (% of new rental stock):

City Size	Bedroom Count	Count of New Rental Units	Percent of New Rental Units
10k-25k	Studio/1 Bedroom	709	43.50%
10k-25k	2 Bedroom	775	47.55%
10k-25k	3+ Bedroom	146	8.96%
Metro or >25K	Studio/1 Bedroom	24,331	59.65%
Metro or >25K	2 Bedroom	13,918	34.12%
Metro or >25K	3+ Bedroom	2,540	6.23%

Figure 53: New Construction Multi-Unit Rental Housing by Unit Size and OHNA Region (% of new rental stock):

Region	Bedroom Count	Count of New Rental Units	Percent of New Rental Units
Central	Studio/1 Bedroom	1,148	38.7%
Central	2 Bedroom	1,407	47.4%
Central	3+ Bedroom	411	13.9%
Metro	Studio/1 Bedroom	19,608	67.1%
Metro	2 Bedroom	8,316	28.5%
Metro	3+ Bedroom	1,300	4.4%
Northeast	Studio/1 Bedroom	72	35.3%
Northeast	2 Bedroom	96	47.1%
Northeast	3+ Bedroom	36	17.6%
Northern Coast	Studio/1 Bedroom	96	47.1%
Northern Coast	2 Bedroom	84	41.2%
Northern Coast	3+ Bedroom	24	11.8%

Region	Bedroom Count	Count of New Rental Units	Percent of New Rental Units
Southeast	Studio/1 Bedroom	19	47.5%
Southeast	2 Bedroom	10	25.0%
Southeast	3+ Bedroom	11	27.5%
Southwest	Studio/1 Bedroom	608	49.8%
Southwest	2 Bedroom	587	48.1%
Southwest	3+ Bedroom	25	2.0%
Willamette Valley	Studio/1 Bedroom	3,489	40.8%
Willamette Valley	2 Bedroom	4,193	49.0%
Willamette Valley	3+ Bedroom	879	10.3%

Figure 54: New Construction Multi-Unit Rental Housing by Unit Size and City Size (distribution of city %s)

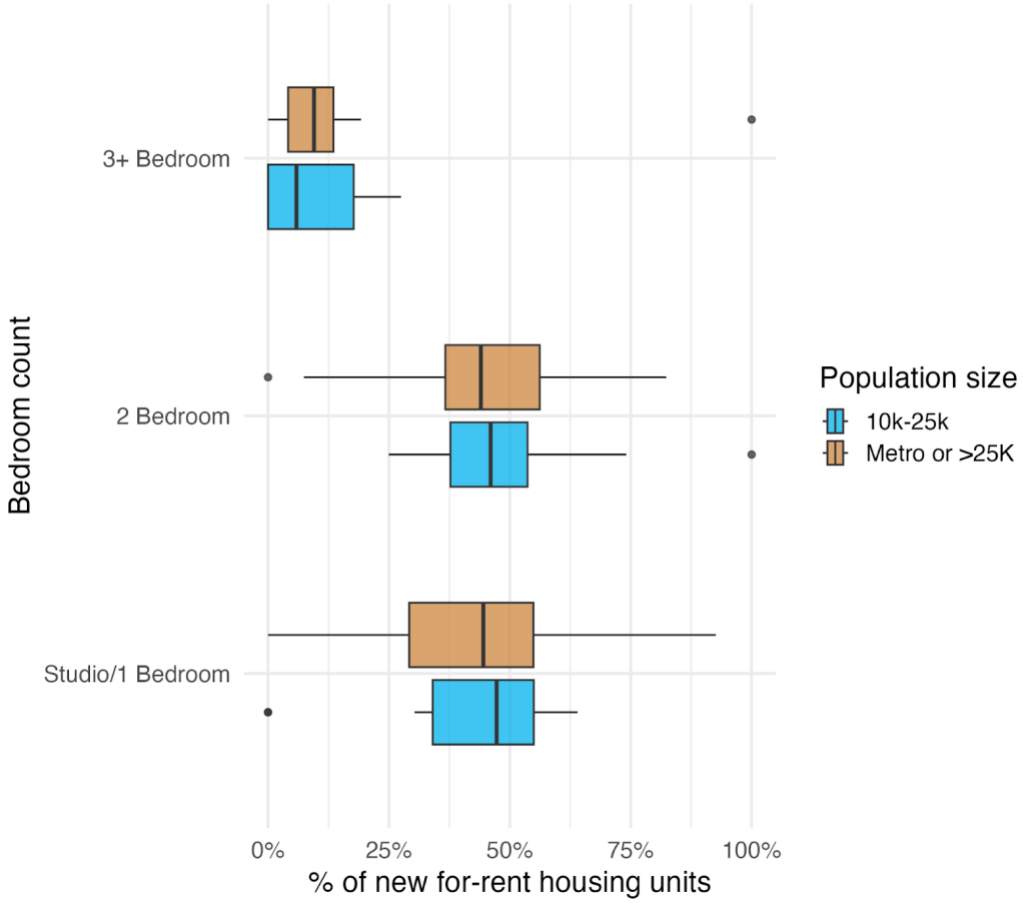
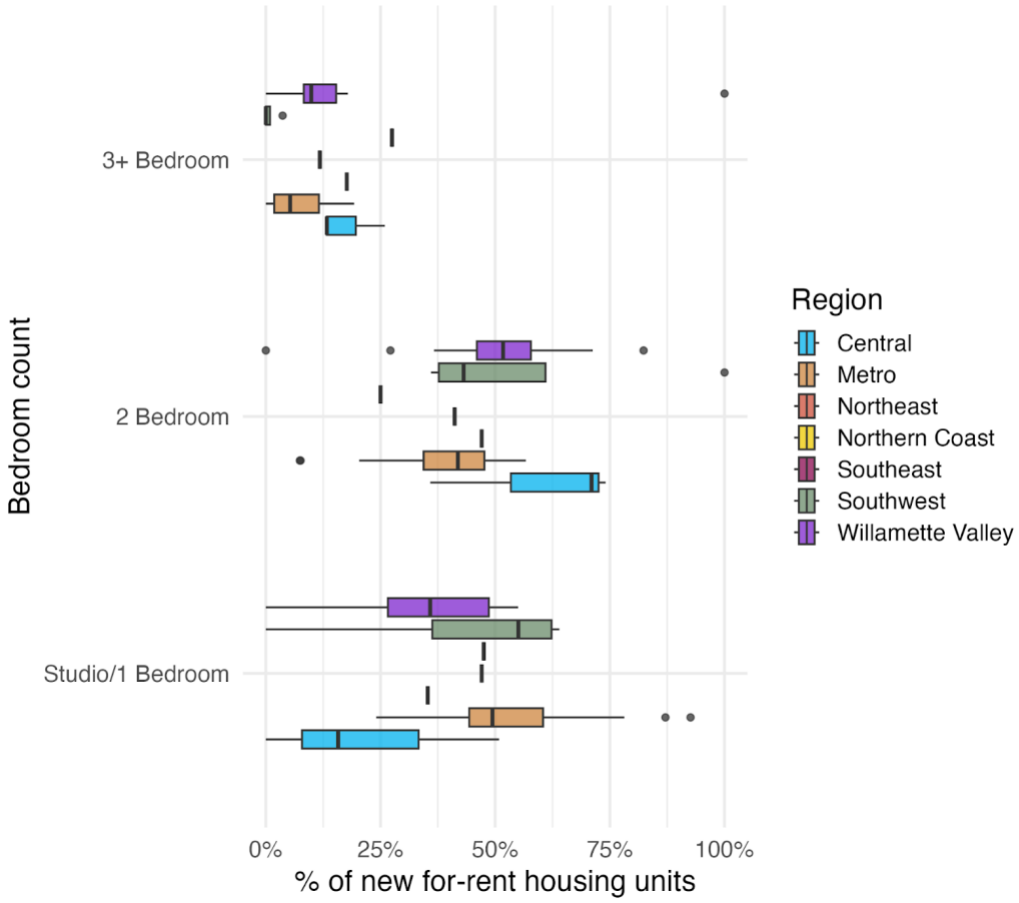


Figure 55: New Construction Multi-Unit Rental Housing by Unit Size and OHNA Region (distribution of city %s)



Geographic Location

Geographic Location Qualitative Assessment of Impact

Question: How might a compliance pathway related to the geographic location of planned development impact the zoning, land use actions, or other choices a city might take to advance the policy objectives?

The state is considering developing a compliance pathway that defines the "areas of opportunity" where cities should plan for greater amounts of housing to be developed. As part of this rule-making effort, the state has developed a draft map of these areas and will be working to finalize it over the coming weeks and months. Additionally, as part of a separate process, the state is developing an environmental justice map that will provide additional inputs to this discussion that have the advantage of community vetting and should be incorporated when available.

We assume that any compliance pathways associated with geographic location would aim to concentrate new development and zoned capacity in identified areas with low harms and high assets. Such a pathway

might, for example, ask cities to plan for a "low end" or "high end" percentage of OHNA target units (overall and/or in specific categories) to be developed in opportunities areas.

Interaction with the HCA / Land Use Efficiency

Efforts to concentrate new development in certain areas have a direct interaction with the HCA and with land use efficiency measures. A quantified need for housing in high-opportunity areas could potentially tie to HCA estimates of capacity. While the HCA is focused on total capacity and overall land need, choices made about land use efficiency measures could increase or decrease opportunities for housing (overall and in specific categories) to be built in high-opportunity areas.

Interaction with the HPS / Action Selection

A compliance pathway that asks cities to plan for more development in certain geographies would also affect action selection in the HPS. For example, incentives might be targeted to development proposed in those areas, or affordable housing development might be more likely to be funded if it is in those areas. A quantified need could translate to more specific actions in terms of the extent of land use changes.

Data Considerations

While the analysis is necessarily preliminary (as maps are still being finalized), we were able to get a baseline read on how patterns of recent development overlap with draft areas of opportunity under the current regulatory environment. The analysis reveals spatial distribution differences between the different subsets of new housing development:

- New for-sale units are predominately located in low harm areas, with more in low asset, low harm areas than in high asset, low harm areas.
- Market rate rentals are predominately located in high asset areas, and are roughly evenly split between High Asset, Low Harm and High Asset, High Harm areas around the state. For the most part, these inner-ring "high harm" areas are classified as such because they are adjacent to busy commercial corridors containing toxic cleanup sites, bike & ped-involved crashes, urban heat island effect, and (especially in the coast and valley areas) flood risk.
- Recent affordable housing projects are largely located in high asset areas, with more in High Asset, Low Harm areas than High asset, high harm areas.

At the highest level, as currently defined and mapped, development patterns are already partially aligned with the direction of policy intent -- new affordable and market-rate rental housing is largely in high asset areas. However, many of them are also in areas of high harm. This raises a question of whether policy objectives would be better achieved by removing or reducing harms in places where development is already occurring, rather than changing development patterns or the location of zoned capacity.

The current definition and mapping of high opportunity areas does not necessarily pick up existing single-unit detached neighborhoods that may have trees, schools, and parks, but not other features such as access to grocery stores, walkable streets, and transit. It also does not include areas that may be concept planned or master planned to become complete, high-opportunity areas in the future but where key features are not

present today. As a result, focusing production of multi-unit and affordable housing in high-opportunity areas as currently identified could mean less pressure on (or even inadvertently discouraging) jurisdictions to expand housing options in existing single-unit detached neighborhoods or to integrate a range of housing options into newly developing areas unless combined with other locational considerations.

The current definition of opportunity areas is partially but not fully aligned with the location preferences in the ORCA; however, we understand that OHCS is considering updating those preferences and the discrepancies may be resolved through that process and/or future refinements to how opportunity mapping is defined. Sending mixed or conflicting signals to affordable housing developers could result in additional challenges with affordable housing production.

Understanding the overlap of these areas of opportunity with communities of color or lower-income communities would be necessary, to ensure that city policies and state compliance pathways don't inadvertently contribute to displacement.

Market considerations

It appears that, in general, opportunity areas align with where the market is driving production for multi-unit housing, less so for for-sale housing. Further efforts to concentrate development in these areas might increase the percentage, especially if it includes incentives and intentional investment in infrastructure and other development supports. Since most of these areas are in historic centers of cities and along highways, they also have the highest concentration of harms (toxic cleanup sites, bike & ped-involved crashes), and those harms will not be easily removed.

To the extent that identified high-opportunity areas overlap with areas with existing high-value development, requiring jurisdictions to expand zoning opportunities for middle housing, multi-unit housing, affordable housing, etc., this may have less impact due to the challenges of redeveloping high-value existing property.

If the compliance pathway resulted in cities providing incentives only in areas of opportunity, or in some way creating barriers to development in areas of low opportunity, the result could be to lower overall housing production.

Additional Considerations

Given the current state of development of maps (including the EJ tool) and need for additional vetting and coordinating with other state agencies, it is difficult to know how a specific quantitative standard would ultimately play out at this time.

- The data on recent development locations give us only a partial look at recent development trends because the datasets are not comprehensive. To arrive at specific percentages in a compliance pathway, the state would need further analysis with finalized maps to understand the average land area covered by opportunity areas or some other metric to inform these decisions.

- Because there is no statewide dataset on zoning, we are unable at this time to determine how much of different types of zoning is currently located within identified high-opportunity areas at a statewide level.
- The geographic interaction with CFEC deserves additional follow up if this is pursued. When the opportunity maps are finalized, how do those overlay with the CFAs that have so far been identified?
- Opportunity maps based on statewide data will never capture the nuance of local experiences with place. The maps that have been developed so far provide a very good starting place for local planning efforts, but cities would likely find them too "coarse" in their geographic specification to be useful.

DLCD will need to develop a process to update and maintain the maps over time.

Geographic Location Data Appendix

1) Recent housing development in high opportunity areas

Prompt: To what extent has recent housing development for multi-unit, middle housing (if available), and affordable housing been located in high-opportunity areas?

- Map recently built multi-unit housing based on CoStar data
- Map recently funded affordable housing based on data from OHCS
- Map recently built for-sale housing based on sales transactions
- Overlay these with working draft maps of opportunity areas. Summarize what share of units in each category are located within high opportunity / low harm areas vs. other combinations of opportunity and harm.

Data: CoStar, Property Radar, and OHCS newly funded affordable housing, draft opportunity maps (with assets and harms noted as relative to concentration of harms and assets in the *state,* not each city relative to itself).

Data limitations: Note this analysis uses a draft version of the opportunity map not fully vetted for this use. We have also chosen to use, for ease of interpretation, the simplified two-by-two classification scheme - if an area is on average above the state median for assets, and on average below the median for harms, it will fall into the "High Asset, Low Harm" category. It is unclear whether this classification will ultimately be the most appropriate way to apply the spatial data for this purpose.

Patterns: The current iteration of the opportunity map typically displays a pattern, for many UGBs, where "High Opportunity, High Harm" areas are located in a UGB's core area, and "Low Opportunity, Low Harm" areas form a ring around the perimeter of the UGB. This is likely because commercial and institutional assets tend to be clustered in urban cores, while harms such as wildfire, flood, and landslide risk tend to be situated in around the fringes of cities.

The analysis reveals spatial distribution differences between the different subsets of new housing development:

- New for-sale units are predominately located in low harm areas, with more in low asset, low harm areas than in high asset, low harm areas.
- Market rate rentals are predominately located in high asset areas, and are roughly evenly split between High Asset, Low Harm and High Asset, High Harm areas around the state.
- Recent affordable housing deals are largely located in high asset areas, with more in High Asset, Low Harm areas than High asset, high harm areas.

Figure 56: Recent For-sale Housing Development by Opportunity Class

Opportunity Class	Count of Units for Sale	Percent of Units for Sale
High asset, High harm	1,856	6.5%
High asset, Low harm	11,208	39.5%
Low asset, High harm	845	3.0%
Low asset, Low harm	14,500	51.0%

Figure 57: Recent Multi-unit Rental Housing Development by Opportunity Class

Opportunity Class	Count of Rental Units	Percent of Rental Units
High asset, High harm	20,191	43.6%
High asset, Low harm	19,762	42.7%
Low asset, High harm	1,072	2.3%
Low asset, Low harm	5,251	11.3%

Figure 58: Recent Affordable Housing Development by Opportunity Class

Opportunity Class	Count of Affordable Housing Units	Percent of Affordable Housing Units
High asset, High harm	4,202	30.3%
High asset, Low harm	8,174	59.0%
Low asset, High harm	153	1.1%
Low asset, Low harm	1,320	9.5%

Accessible Units

Accessible Units Qualitative Assessment of Impacts

Question: How might compliance pathways on accessibility impact zoning, land use actions, or other choices a city might take to advance the policy objectives?

The state is considering developing a compliance pathway for accessibility as part of the definition of "needed housing" in each city's contextualized housing need (CHN). The state's rules already require cities to evaluate the need for accessible units, but this new compliance pathway would provide specific "off the shelf" measures that could be used as (or be required to be used as) a quantitative reference point in that assessment of needed housing for people living with disabilities.

This is a particularly difficult issue to analyze with available data. There is no reliable source of statewide data to help us understand the availability of accessible units in the stock, and we can only infer the need for accessible units in the population from sources such as the Census. Some relevant findings:

- Between 5 - 10+% of the non-institutionalized population identifies as having "independent living difficulties" and / or "ambulatory disabilities", based on census data (see data appendix for details).
- There is limited variation in these metrics by region, when considered on average, but large variation when evaluated at the city level, and large margins of error in the city-level data.
    - Larger cities and those in the Metro region have lower rates of independent living difficulty of ambulatory disability, which may be correlated with the age and non-institutionalized group quarter population demographics in these geographies.
    - We see clear differences in rates of ambulatory disability or independent living difficulties by income. Statewide, nearly 50% of households with a person with these challenges have incomes below 60% of AMI. We see inverse patterns at upper income levels. This suggests a more urgent need for accessibility in regulated affordable units.
    - We also found a clear pattern of increased challenge by age (with a noticeable increase between the 65-74 and the 75+ age cohorts), suggesting the need for accessible units will be increasing in the coming years.
- It's unclear how these census designations actually translate to a type of unit that might be needed. Not all independent living or ambulatory difficulties require accessible units.
- In the absence of data about accessible or adaptable units, we've attempted an analysis of newly constructed units based on available data about building size and form, from which we might be able to infer accessibility. This analysis suggests that for the 3-county Metro region a little over half of the multi-unit housing units built since 2018 may have been built to Type B adaptable standards, and a little under 2% of the multi-unit housing units may have been built to Type A adaptable standards. The estimated Type B share is higher than in other parts of the state, but variations in Type A shares are unlikely to be reliable given the uncertainty in the data and methodology.

Despite these data challenges, we know that our market is undersupplied with housing that meets accessibility standards relative to need, and that the need is only increasing as our population ages. Given all of this, we assume that any compliance pathway the state might design would aim to build from this limited available information to set some markers that will help jurisdictions focus on meeting need. A "low end" assumption might use the overall low end of the very rough range that our analysis suggests (for example, 5%) and a "high end" might push toward an even more aggressive expectation than this census-based analysis

suggests, given an aging population, city-level variation in census data, and other analysis that goes beyond census data often suggest higher ranges.

Our overall assessment suggests that data are less helpful in designing a compliance pathway for accessibility than for perhaps any other area the state is considering. At the same time, we know that we must increase the availability of these units to better meet need. Any compliance pathway would necessarily be a policy choice, informed by data but not dictated by data, designed to generally increase the supply of accessible units.

Interaction with the HCA / land use efficiency

Likely none, unless jurisdictions recognize that higher-density, elevator served units are more likely to meet accessibility needs and adjust assumptions about needed unit mix, which would then affect calculations of land need in the HCA. But more likely, there is no direct impact on the HCA.

Interaction with the HPS / action selection

Creating a compliance pathway on accessibility would increase the focus on the need for actions to support the development of accessible units. Further, it would increase "certainty" around planning goals, given lack of data availability. City-level data is particularly challenging to use, with high margins of error, so individual city-level analysis may be particularly fraught. Additionally, the analysis is time consuming to do well, and an off-the-shelf assumption might save cities time. It would also save cities having to defend assumptions that data don't perfectly support, as they could point to state policy goals as the source of their assumptions.

At the same time, because cities are already required to consider accessibility in defining needed housing in their CHN and are already required to consider that need in adopting actions, it's unclear how a changes CHN assumption would translate to different or greater action.

Likely market / policy response to low- or high-end thresholds (including potential unintended consequences)

Generally, if jurisdictions respond with regulatory or financial incentives for accessible units, there are fewer potential negative impacts. If jurisdictions respond with local requirements for accessible or adaptable units, there could be more unintended consequences.

- If jurisdictions were to set localized requirements for accessible or adaptable units in multi-unit developments that are different from building code, this could create several unintended consequences, including:
    - Increased complexity for developers working across multiple jurisdictions.
    - Units that meet Type A standards may make less efficient use of space for someone who does not use a mobility device than other units. If jurisdictions impose requirements for Type A units that go beyond building code, this could make it harder to design small units that can provide lower-cost rental housing options.
    - Potential for jurisdictions to set requirements that are not achievable without an elevator (e.g., requiring 50% of units in a 3-story building to be Type B likely could not be met through

ground-floor units alone), which would increase the cost of development and make one of the common market-rate housing prototypes that can deliver affordability for middle-income households less financially feasible.

- Type A and Type B standards are not currently applicable to development under the residential code including single-unit detached, townhouses, and side-by-side plexes. In addition, Type A and B standards are less relevant for multi-story units, especially higher-density multi-story units such as townhouses that may not have substantial living areas on the ground floor. Setting too high of a target for Type A and B units could discourage inclusion of these housing types in the housing mix, including housing types that can offer lower-cost homeownership opportunities.
- If jurisdictions impose requirements for ground-floor accessibility / visitability for units not covered by commercial building code requirements this could mean many builders would need to develop new floor plans and there would be fewer options for design of entryways. While highly beneficial for those who need them, these features may not be as desirable for households that do not need them at the time they are choosing a home, which could, in some cases, decrease what those households are willing to pay for the unit and make development less feasible.

Additional Considerations

- Because of data quality issues and the fluid nature of the need for accessible units (for example, "need" changes with age), any quantitative compliance pathway is likely to be poorly calibrated. But the outcomes and unintended consequences of putting in place a compliance pathway may be limited (whether at the low end or at the high end). The overall goal would simply be to increase overall availability of accessible units and ensure city-level attention to this issue.
- If the state is interested in this compliance pathway, some additional analysis designed specifically to understand the likely high-end need for accessible units would be helpful. This analysis would need to look at literature from across the country and extrapolate findings to the state-wide context. Ideally, it would also include interviews with experts in development and with disability advocates. However, even this analysis would come with many caveats, and ultimately, a policy judgement call would still be needed.
- Requirements for individual developments to meet accessibility standards will increase the cost of that development (though the amount of cost increase varies greatly by unit type). Any state-level support to underwrite these costs would help to move the needle.
- Not all accessible units are occupied by households that need an accessible unit. Increasing supply of accessible and adaptable units will help with "unit matching" to some extent but will not entirely solve that challenge.
- While many households could benefit from adaptability features at some point in their lives, households have to make tradeoffs in finding a place to live, and if they do not need those features at the time they are finding housing, they may be better off to select a home that offers other benefits instead.

A focus on producing new units meeting Type A and Type B standards as a way to meet accessibility needs overlooks the importance of retrofitting the housing that people already live in to meet their needs better.

This can provide more benefits to the specific individuals as it does not require them to relocate and may be more affordable to them than new housing. Providing more flexibility in how to define the housing needs related to accessibility could allow jurisdictions to identify needs for retrofitted housing as part of the overall need for accessible housing where that better aligns with their local equitable engagement.

Accessible Units Data Appendix

1) Prevalence of disabilities overall

Prompt: Share of population with an ambulatory disability and independent living difficulties

Data: 2023 ACS 5-Year estimates at the place level. Subject table S1810 provides disability characteristics for the civilian noninstitutionalized population by disability type.

Data limitations: The universe for this census table is civilian non-institutionalized population and thus includes population living in households as well as civilian non-institutional group quarters (such as shelter but excluding military quarters). As the presence and population contribution of such group quarters can vary from city to city and thus have a variable impact on the estimated share of population with disabilities.

1a) Independent Living Difficulties

Patterns: Larger cities and those in the Metro region have lower rates of civilian non-institutionalized population with independent living difficulties. This may be correlated with the age and non-institutionalized group quarter population demographics in these geographies.

Figure 59: Noninstitutionalized Population with Independent Living Difficulties by City Size

City Size	Estimate	MOE	Percent	MOE
10k-25k	21,531	1,161	6.8%	0.4%
Metro or >25K	113,365	3,003	5.0%	0.1%

Figure 60: Noninstitutionalized Population with Independent Living Difficulties by OHNA Region

Region	Estimate	MOE	Share	MOE
Central	6,479	784	4.4%	0.5%
Metro	61,877	2,281	4.6%	0.2%
Northeast	4,791	563	6.6%	0.8%
Northern Coast	1,742	285	7.3%	1.2%
Southeast	2,465	389	7.4%	1.2%
Southwest	13,684	906	6.4%	0.4%
Willamette Valley	43,858	1,783	5.9%	0.2%

Figure 61: Share of Noninstitutionalized Population Living with Independent Living Difficulties by City Size

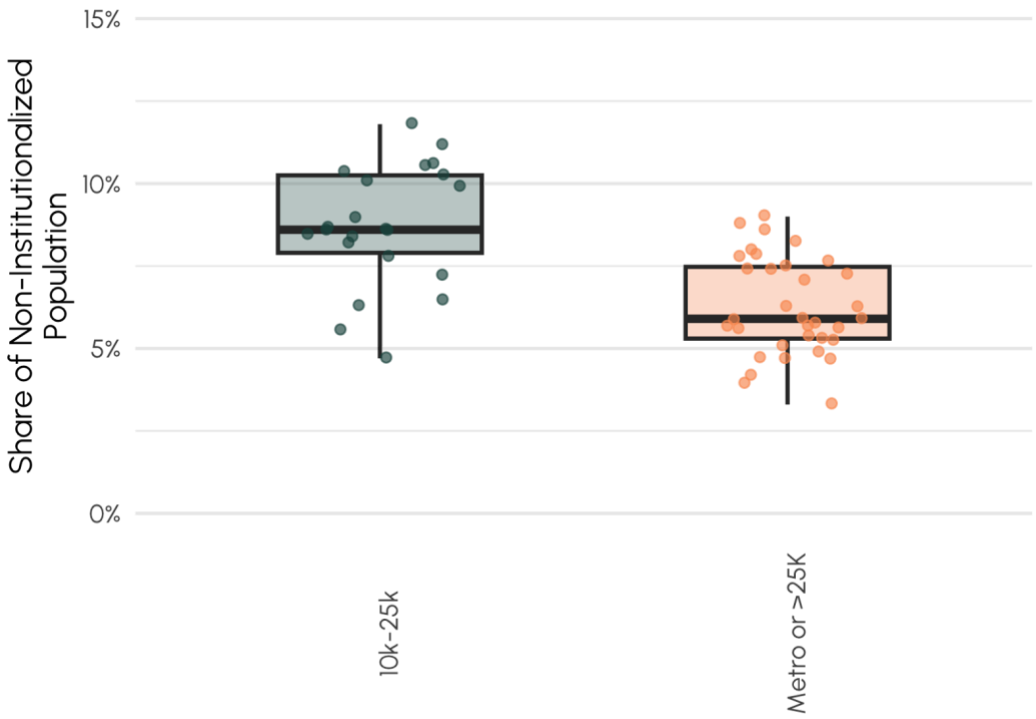
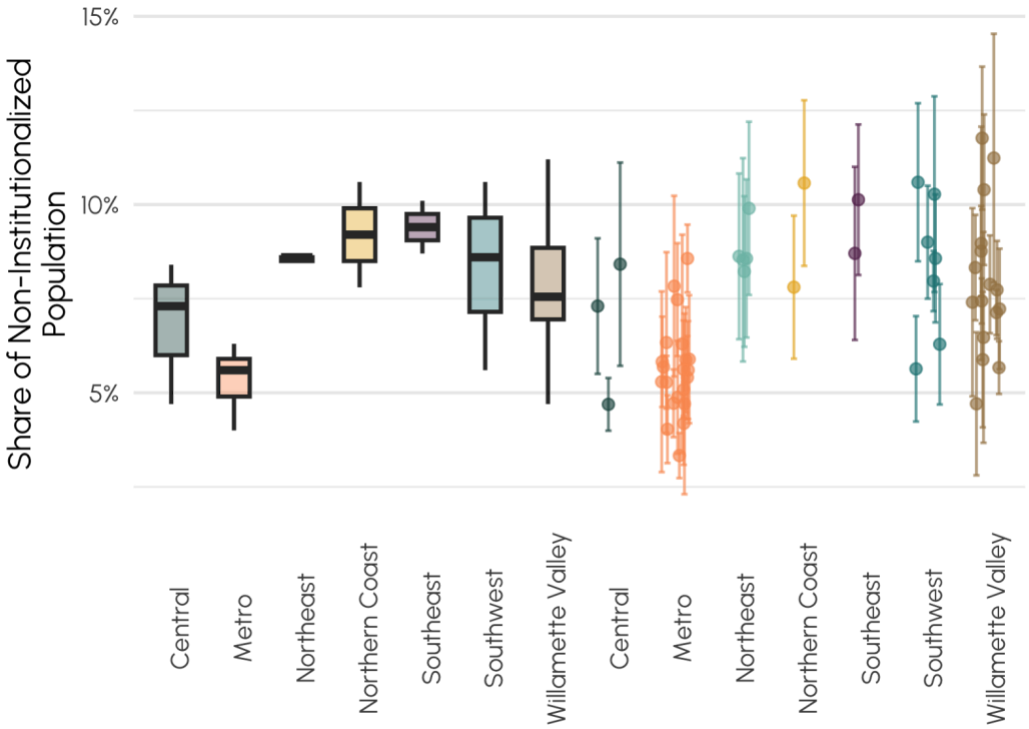


Figure 62: Share of Noninstitutionalized Population Living with Independent Living Difficulties by OHNA Region and City



1b) Ambulatory Disabilities

Patterns: Similar to independent living difficulties, larger cities and those within the Metro region have lower rates of civilian non-institutionalized population with ambulatory disabilities difficulties. This may be correlated with the age and non-institutionalized group quarter population demographics in these geographies.

Figure 63: Noninstitutionalized Population with Ambulatory Disabilities by City Size

City Size	Estimate	MOE	Percent	MOE
10k-25k	26,989	1,256	8.5%	0.4%
Metro or >25K	127,959	3,079	5.7%	0.1%

Figure 64: Noninstitutionalized Population with Ambulatory Disabilities by OHNA Region

Region	Estimate	MOE	Share	MOE
Central	8,272	904	5.6%	0.6%
Metro	68,587	2,301	5.1%	0.2%
Northeast	6,203	565	8.5%	0.8%

Region	Estimate	MOE	Share	MOE
Northern Coast	2,053	357	8.6%	1.5%
Southeast	3,263	403	9.9%	1.2%
Southwest	17,081	1,039	8.0%	0.5%
Willamette Valley	49,489	1,805	6.7%	0.2%

Figure 65: Share of Noninstitutionalized Population Living with Ambulatory Disabilities by OHNA Region and City

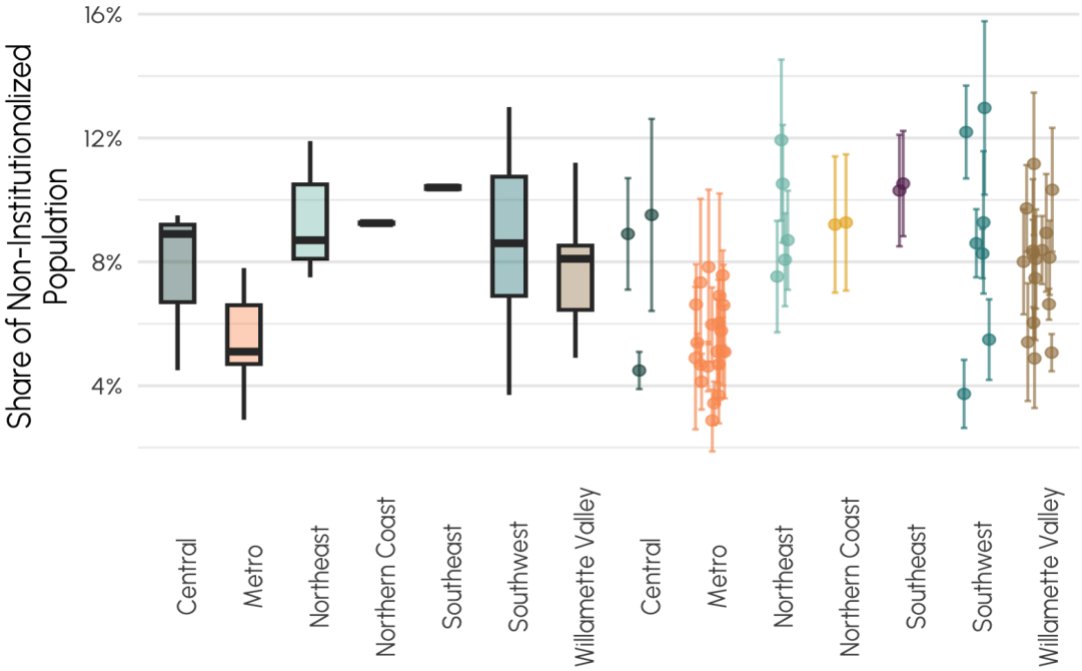
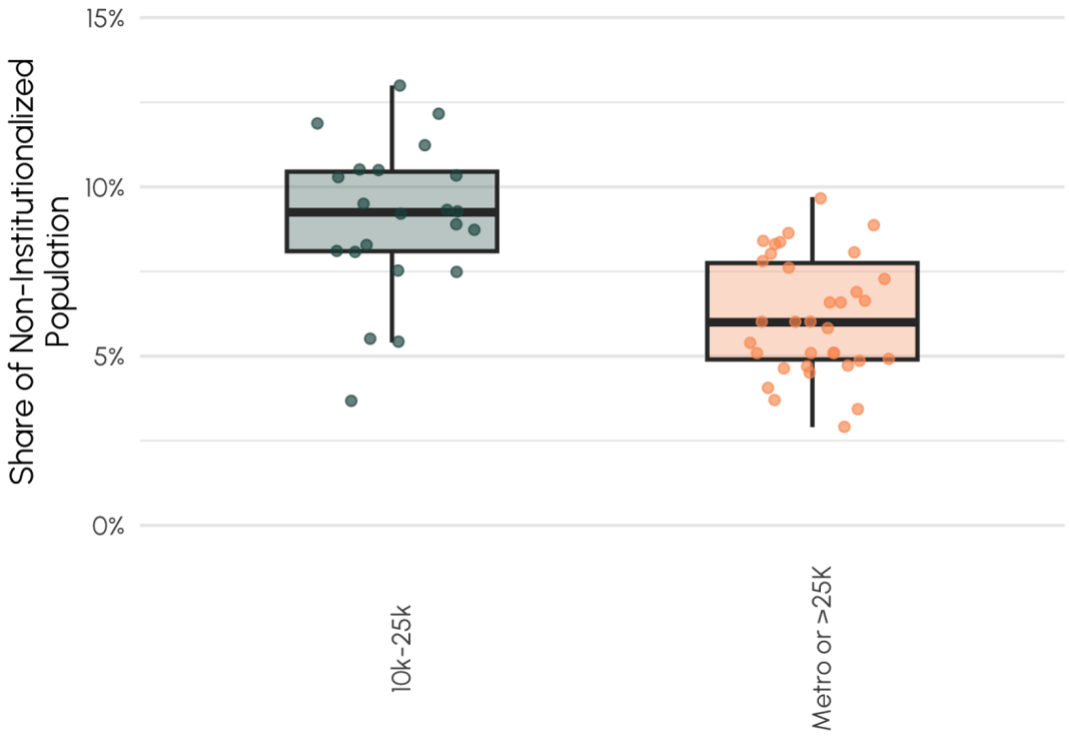


Figure 66: Share of Noninstitutionalized Population Living with Ambulatory Disabilities by City Size



1c) Prevalence of Disabilities by Age

Prompt: Analyze prevalence of ambulatory disabilities by age - at what age is prevalence of ambulatory disability significantly higher than in the overall population.

Data: 2023 ACS 5-Year PUMS, statewide.

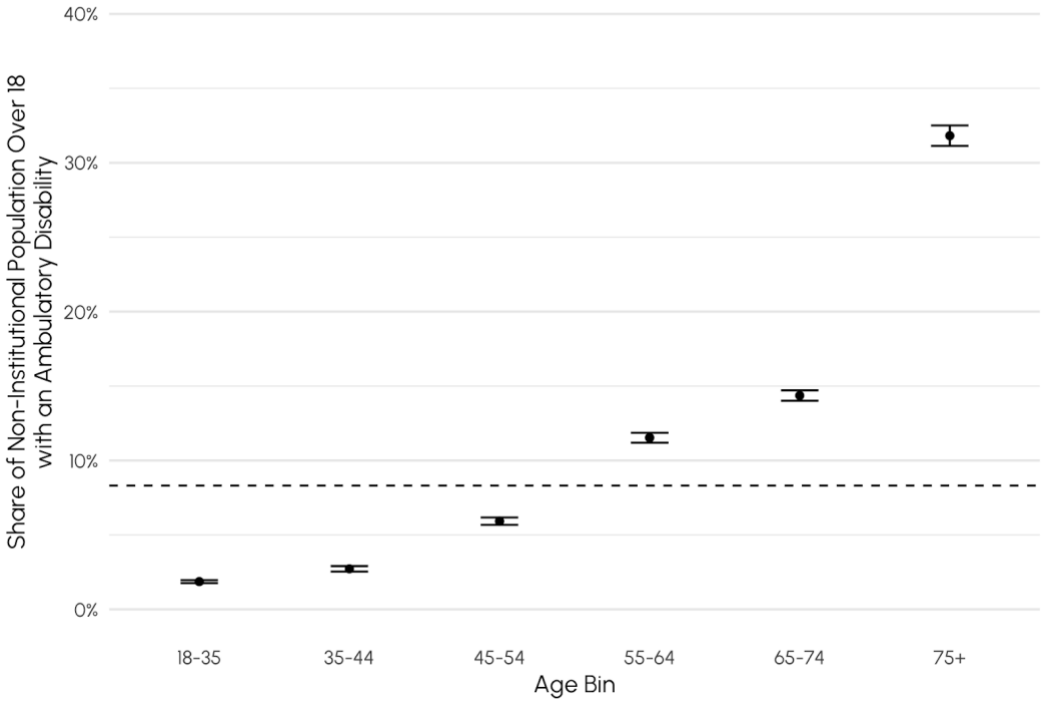
Data limitations: The general universe for this census disability statistics is the total civilian non-institutionalized population. For this exercise, we use the closest approximation we can reach using PUMS data and consider the prevalence of ambulatory disability by 10-year age bins among the total non-institutionalized population. That is to say we exclude institutional group quarters however we are unable to exclude population in military quarters when we include non-institutional group quarters.

Patterns: The population aged 75 years or older have a noticeably higher rate of ambulatory disability than the general population. The ambulatory disability rate for the 18+ population as a whole is estimated to be 8.3%. Populations between 55-64 and 65-74 do see higher prevalence of ambulatory disabilities, relative to the population as a whole. That said, the prevalence rate increases fairly linearly up to the 65-74 bin at which point there is a significant jump in the ambulatory disability rate.

Figure 67: Share of Noninstitutionalized Population over 18 with Ambulatory Disability by Age

Age Bin	Share of Population with Ambulatory Disability	MOE	Percent Point Increase from Previous Age Bin
18-35	1.9%	0.1%	
35-44	2.7%	0.2%	0.9%
45-54	5.9%	0.2%	3.2%
55-64	11.5%	0.3%	5.6%
65-74	14.4%	0.3%	2.8%
75+	31.8%	0.7%	17.5%
Population Average (18+)	8.3%	0.1%	

Figure 68: Share of Noninstitutionalized Population over 18 with Ambulatory Disability by Age



2) Disability and Household Income

Prompt: Analyze prevalence of ambulatory and independent living disabilities by income: are households with members with these disabilities overrepresented among low-income households in the state?

Data: 2023 ACS 5-Year PUMS, statewide.

Data limitations: The general universe for census disability statistics is the total civilian non-institutionalized population. For this exercise, however, the unit of analysis is households rather than persons. Households with one or more members indicated as having an ambulatory disability are coded as "households with the presence of person(s) with ambulatory disability". Persons in group quarters are excluded from this analysis. Region based MFI are used to calculate AMI. A single person can face both ambulatory and independent living difficulties. Additionally, a single household can contain person(s) who face either or both disabilities. As such a single household may be counted in both household level disability statistics.

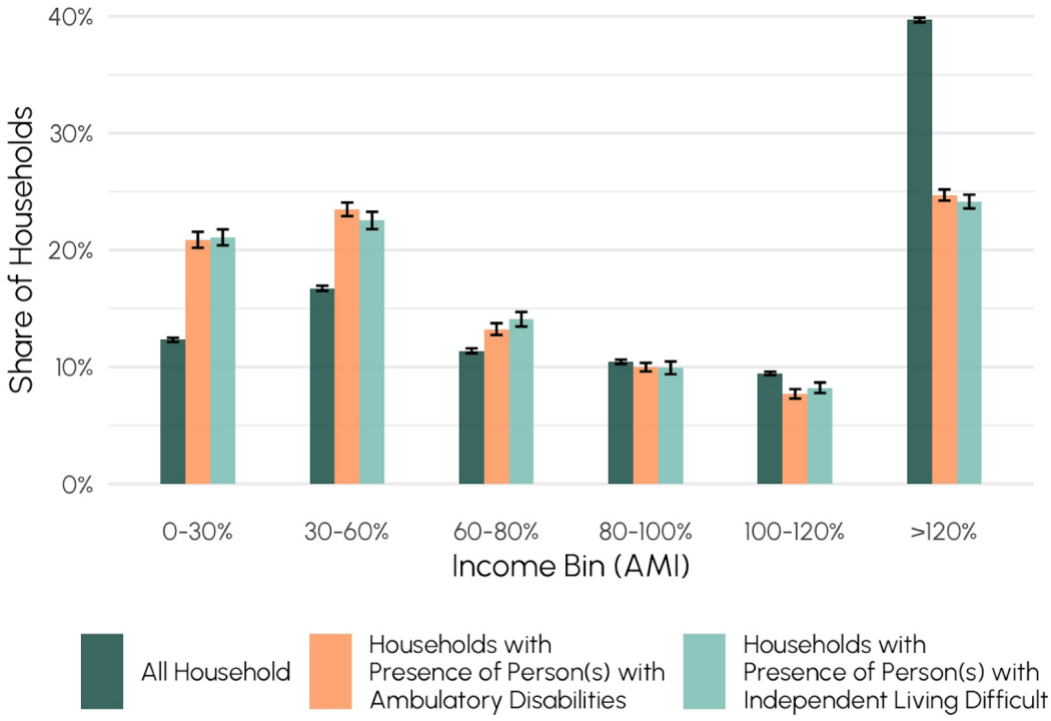
Patterns: The income distribution of households with the presence of person(s) with ambulatory and/or independent living difficulties is significantly different from that of all households in the state. These households are overrepresented at AMI's below 80% and underrepresented at >120% AMI income range.

Summary table (Statewide):

Figure 69: Share of Households with Person(s) with Disabilities by Income

AMI	All Household	Households with Presence of Person(s) with Ambulatory Disabilities	Households with Presence of Person(s) with Independent Living Difficulties
0-30%	12.3%	20.9%	21.1%
30-60%	16.7%	23.5%	22.5%
60-80%	11.4%	13.2%	14.1%
80-100%	10.4%	10.0%	9.9%
100-120%	9.4%	7.7%	8.2%
>120%	39.7%	24.7%	24.1%
Total	100%	100%	100%

Figure 70: Share of Households based on Disability Status by Income



3) Estimated Prevalence of Accessible / Adaptable Units

Prompt: Using available CoStar data on development scale and known thresholds for Type A and Type B unit requirements, provide a rough approximation of the number or share of units that may be Type A and Type B from recent housing production.

Data: CoStar building records for multiunit developments built in Oregon since 2018, excluding senior housing, student housing, vacation rentals, corporate housing, co-ops, and condos.

Data limitations: The data reflects multiunit housing only. The estimates are very rough approximations based on the available data on building form, number of stories, presence of elevators, and number of units. They may be over-estimates where town-house style units were not able to be excluded from the data or where the number of ground-floor units is less than the number of units on upper levels. In more limited situations, these may be under-estimates where the presence of an elevator was not reflected in the data. Because they exclude senior housing, which is typically more likely to include accessible and/or adaptable units, this is a source of accessible and adaptable housing that is not reflected in the data. Not all multiunit housing is included in CoStar's database, especially for smaller developments and smaller markets.

Patterns:

- **City size:** Large and Metro cities appear to have a higher percentage of Type B units than other city sizes. The data for smaller cities is less likely to be reliable, and the small, estimated share of Type A units makes these observations particularly unreliable for the smaller cities.
- **Region:** The estimated share of Type B units varies by region based on the prevalence of elevator-served buildings, with higher estimated shares in Metro (over 50%) than in the rest of the state. In the Willamette Valley and Central Oregon, the share is roughly 40% of units assumed to be Type B; there are enough observations to make the data relatively reliable (within the limitations discussed above). Data for the Southeast, Northeast, and Northern Coast regions are particularly spotty and more likely to be unreliable. The variations between regions in the estimated share of Type A units are unlikely to be reliable given the level of uncertainty in the data, particularly for smaller regions.

Figure 71: Estimated Number of Accessible / Adaptable Units by City Size

City Size	Sum of Type A Units	Sum of Type B Units	Sum of Total Units	Type A %	Type B %
<10k	40	892	2,169	1.84%	41.12%
10k-25k	62	1,028	2,970	2.09%	34.61%
Metro or >25K	1,025	27,455	53,768	1.91%	51.06%
Grand Total	1,127	29,375	58,907	1.91%	49.87%

Figure 72: Estimated Number of Accessible / Adaptable Units by OHNA Region

Region	Sum of Type A Units	Sum of Type B Units	Sum of Total Units	Type A %	Type B %
Central	70	1438	3642	1.92%	39.48%
Metro	751	21,406	39,391	1.91%	54.34%
Northeast	17	283	833	2.04%	33.97%
Northern Coast	15	279	747	2.01%	37.35%
Southeast	2	51	108	1.85%	47.22%
Southwest	39	656	1,936	2.01%	33.88%
Willamette Valley	233	5,262	12,250	1.90%	42.96%
Grand Total	1,127	29,375	58,907	1.91%	49.87%

Figure 73: Estimated Share of Newly Constructed Accessible / Adaptable Units by City Size

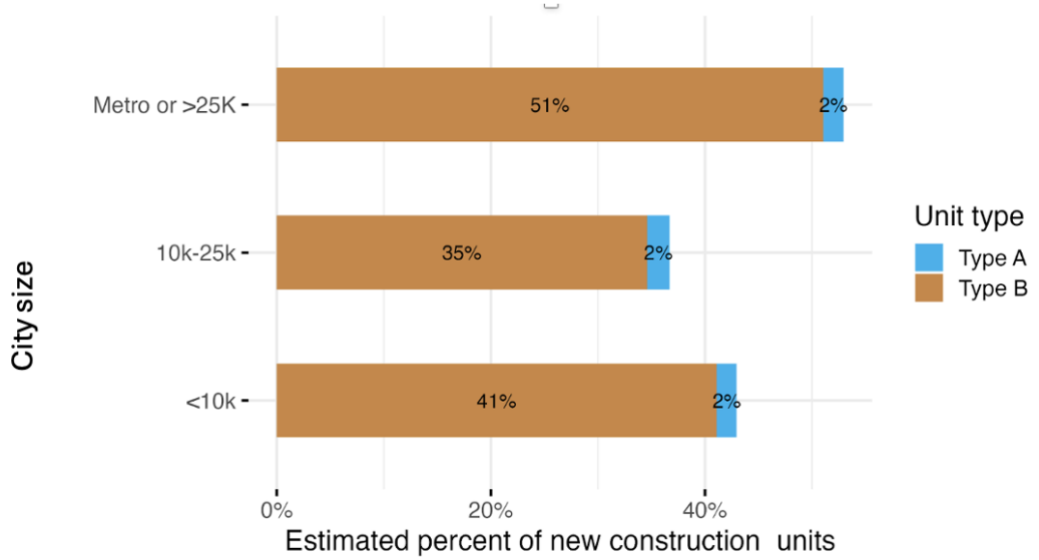
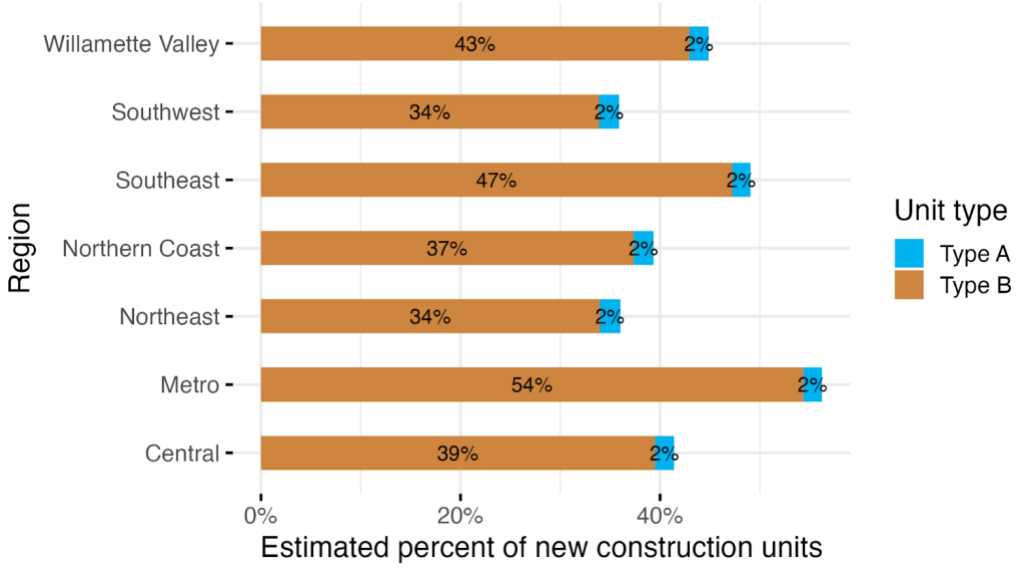


Figure 74: Estimated Share of Newly Constructed Accessible/ Adaptable Units by OHNA Region



Affordable Homeownership

Affordable Homeownership Qualitative Assessment of Impact

Question: How might compliance pathways on affordable homeownership impact zoning, land use actions, or other choices a city might take to advance the policy objectives?

The state is considering developing a compliance pathway for affordable homeownership as part of the definition of "needed housing" in each city's contextualized housing need (CHN). The state's rules already

require cities to evaluate need by tenure, but this new compliance pathway would provide specific "off the shelf" measures that could be used as (or be required to be used as) a quantitative reference point in that evaluation.

The state faces some complicated choices about how to design a potential compliance pathway on affordable home ownership.

- Identifying the "need" for home ownership is challenging. We know current housing tenure for households of various income levels (lower income households are far more likely to be renters), but we don't know where they would *like* to be living. One way to think about this is through revealed preferences: we can observe the patterns of those who are less income constrained (above 120% of AMI) and assume that lower- and middle-income households "need" access to home ownership products at similarly high rates. Another approach would be to choose a "high" or "low" end ownership rate by income, based on where people of various incomes are currently living, which is necessarily constrained by their available income. The state will need to think through this challenge in designing this compliance pathway; choices could result in large swings in the percentages that cities are asked to plan for.
- Tenure and unit type are tightly interwoven. There will be interaction (whether explicitly recognized in a compliance pathway or not) with any unit mix compliance pathway that is implemented. Our analysis found that, statewide and among only the subset of the market that is ownership tenure, just **12% of new construction single-unit detached** development is affordable to households below 100% of AMI, while **59% of new middle housing** units were affordable to households below 100% of AMI.

Interaction with the HCA / land use efficiency

Any approach to the compliance pathway that affected unit mix choices (for example, increased the percentage of middle housing at the cost of multi-unit, to try to increase the supply of ownership units that might be affordable) would affect the city's calculation of land need in the HCA and potentially affect decisions about the need for increased zoned capacity.

Interaction with the HPS / action selection

Creating a compliance pathway on affordable home ownership could increase the focus on the need for actions to support these needs. It's unclear how adding a quantitative metric on affordable homeownership would translate directly to changes in city action that would better achieve policy objectives, beyond what's already required in the rules.

Likely market / policy response to low- or high-end thresholds (including potential unintended consequences)

In these hypothetical compliance pathway designs, the following outcomes are possible:

- Cities might put more resources toward affordable home ownership, potentially at the expense of other priorities

- Cities might increase their effort in developing smaller-scale or middle housing types, at the expense of multi-unit types

Additional Considerations

- Because of the relationship between tenure and type, increased focus on affordable home ownership in new production risks running counter to other policy objectives that are achieved through development of multi-unit housing types. City actions or policies that aim to increase the rate of homeownership in existing development (for example, downpayment assistance programs or partnerships with land banks) do not carry this risk.
- The benefits of home ownership (stability, wealth building, etc.) are important outcomes that are meeting a range of policy objectives beyond housing production and affordability.

Affordable Homeownership Data Appendix

1) Existing homeownership rates by income level

Prompt: Illustrate and analyze differences in the rate of homeownership across income brackets using relevant data from the Housing Equity Indicators and any other relevant data.

Data: HUD's Comprehensive Housing Affordability Strategy (CHAS) data which relies on 2017-2021 ACS 5-Year estimates.

Data Limitations: This data lag should be considered when using these findings -- they are effectively showing pre-pandemic patterns, but this is the only dataset available for this analysis statewide. The CHAS dataset provides estimates for total owner and renter households by income bin. These income bins (HAMFI) are the median family income calculated by HUD for each jurisdiction, to determine Fair Market Rents (FMRs) and income limits for HUD programs. The data visualization uses point estimates to display the interquartile range by region or size. It is not possible to include the margin of error (MOE) for the estimate because each individual point has its own MOE and including the MOE for each would obscure the desired outcome of understanding the range and its midpoint. If you were to provide MOE per each point, it might increase the perceived variance by region.

Some OHNA regions are made up of less than a handful of cities with populations greater than 10,000. The interquartile range (for the box and whisker plot) in such cases, simply visualizes the range of the few points.

Patterns: As expected, homeownership rates go up as AMI increases. The distribution of the regions is fairly consistent across AMI bins. The Metro region has high variance across cities across all income bins. The largest cities 50k+ have lower median homeownership rates (and a lower variance) across all income bins relative to small and mid-sized cities. This pattern is harder to see in analysis that includes Metro with cities over 25k population.

Figure 75: Owner-Occupied Units by Income Level and City Size

City Size	Area Median Income Level	Count of Units	Share of Units
10k-25k	0-30%	6,725	6%
10k-25k	30-50%	8,620	8%
10k-25k	50-80%	16,115	15%
10k-25k	80-100%	11,930	11%
10k-25k	>100%	62,365	59%
25k-50k	0-30%	5,915	6%
25k-50k	30-50%	6,420	7%
25k-50k	50-80%	13,660	14%
25k-50k	80-100%	9,750	10%
25k-50k	>100%	61,390	63%
50k+	0-30%	24,280	6%
50k+	30-50%	26,565	7%
50k+	50-80%	51,300	14%
50k+	80-100%	37,220	10%
50k+	>100%	237,120	63%

Figure 76: Owner-Occupied Units by Income Level and City Size (including Metro)

City Size	Area Median Income Level	Count of Units	Share of Units
10k-25k	0-30%	5,120	7%
10k-25k	30-50%	6,255	9%
10k-25k	50-80%	11,020	15%
10k-25k	80-100%	7,365	10%
10k-25k	>100%	43,095	59%
Metro or >25K	0-30%	31,800	6%
Metro or >25K	30-50%	35,350	7%
Metro or >25K	50-80%	70,055	14%
Metro or >25K	80-100%	51,535	10%
Metro or >25K	>100%	317,780	63%

Figure 77: Owner-Occupied Units by Income Level and OHNA Region

Region	Area Median Income Level	Count of Units	Share of Units
Central	0-30%	2,200	6%
Central	30-50%	2,765	8%
Central	50-80%	5,655	16%
Central	80-100%	4,235	12%
Central	>100%	20,715	58%
Metro	0-30%	20,360	7%
Metro	30-50%	22,015	7%
Metro	50-80%	42,130	14%
Metro	80-100%	31,105	10%
Metro	>100%	196,050	63%
Northeast	0-30%	795	5%
Northeast	30-50%	1,360	8%
Northeast	50-80%	2,505	15%
Northeast	80-100%	2,135	13%
Northeast	>100%	9,985	60%
Northern Coast	0-30%	455	8%
Northern Coast	30-50%	485	9%
Northern Coast	50-80%	665	12%
Northern Coast	80-100%	740	14%
Northern Coast	>100%	3,030	56%
Southeast	0-30%	685	11%
Southeast	30-50%	810	12%
Southeast	50-80%	960	15%
Southeast	80-100%	550	8%
Southeast	>100%	3,485	54%
Southwest	0-30%	3,010	6%
Southwest	30-50%	3,825	8%
Southwest	50-80%	7,380	15%
Southwest	80-100%	4,815	10%
Southwest	>100%	30,720	62%
Willamette Valley	0-30%	9,415	6%

Willamette Valley	30-50%	10,345	7%
Willamette Valley	50-80%	21,780	14%
Willamette Valley	80-100%	15,320	10%
Willamette Valley	>100%	96,890	63%

Figure 78: Homeownership Rate by Income Level and OHNA Region

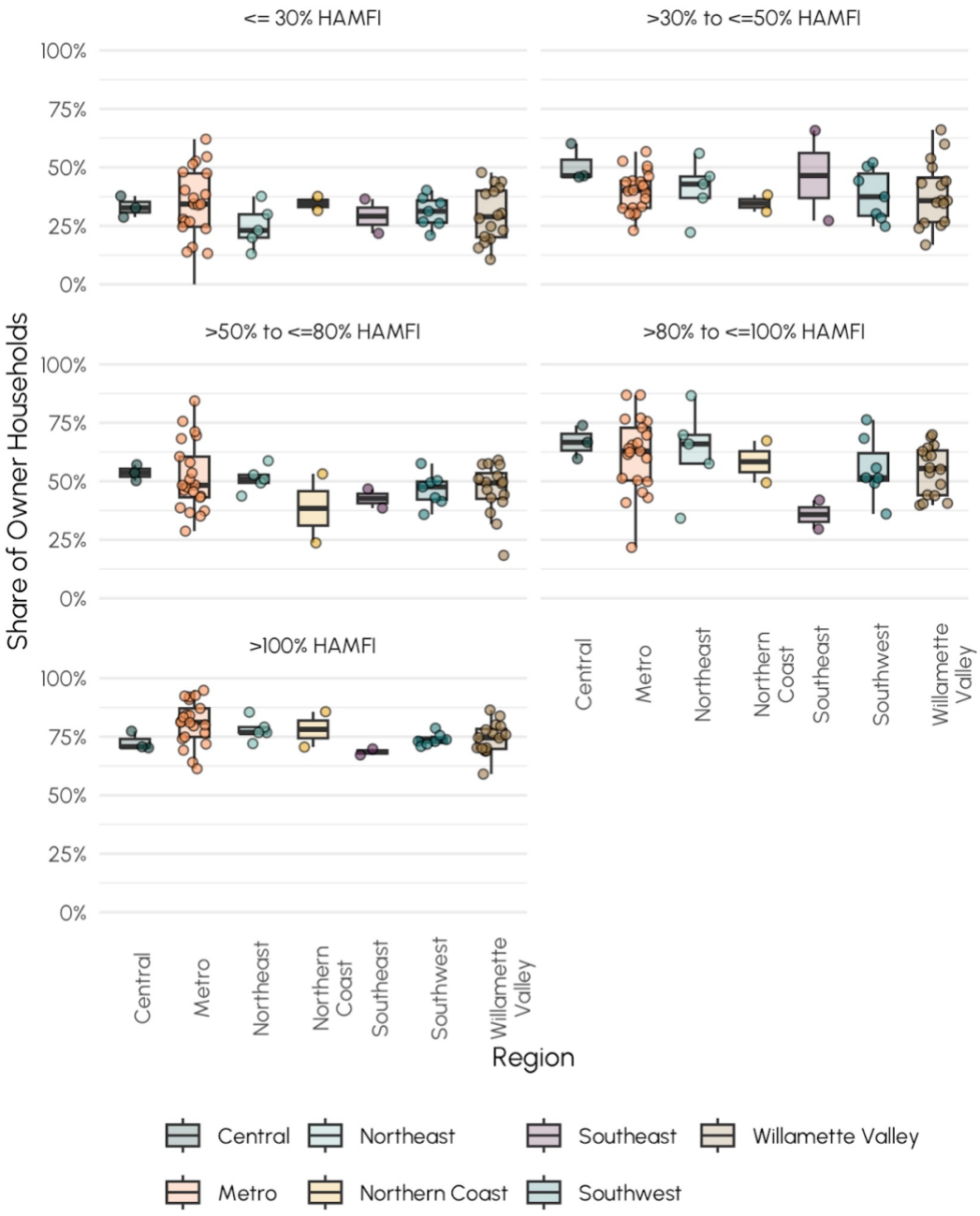
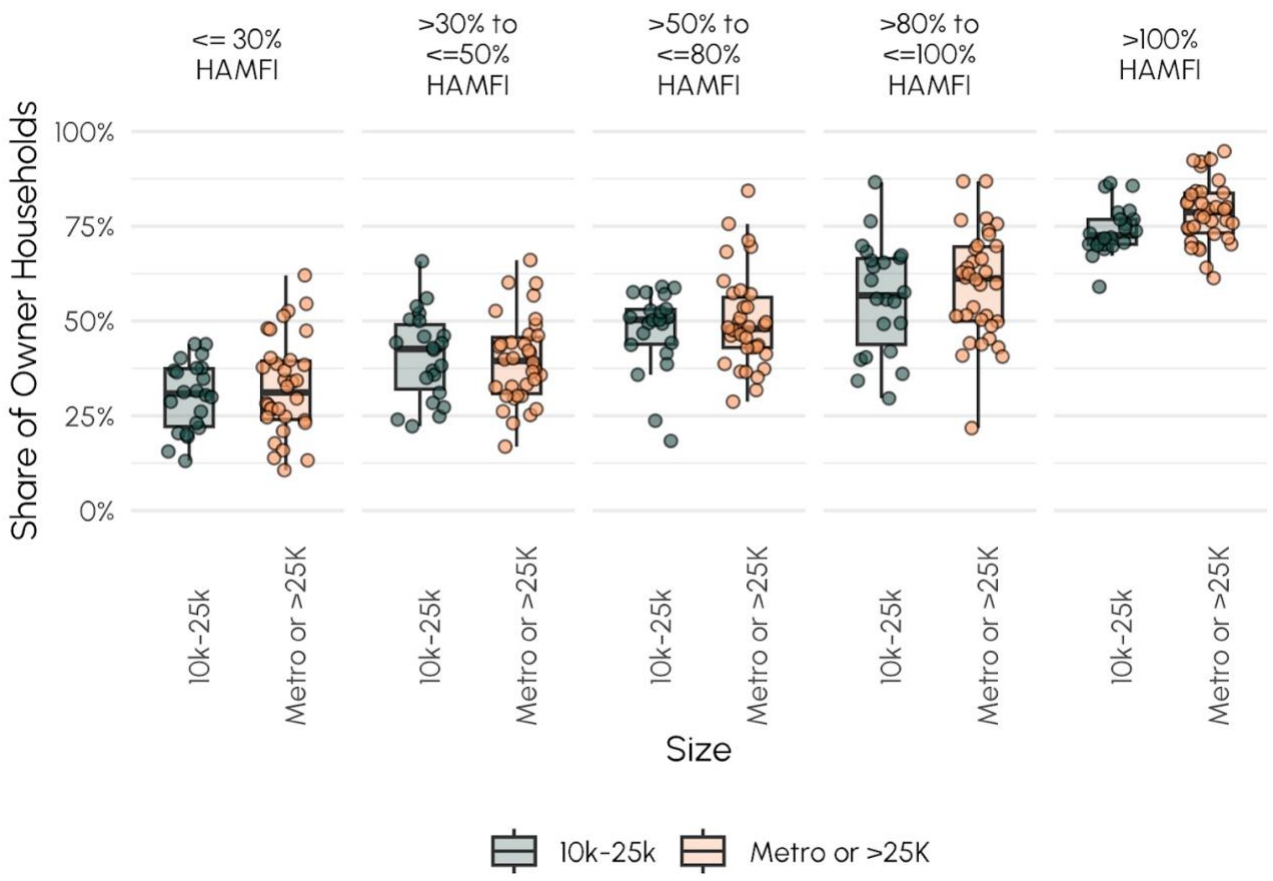


Figure 79: Homeownership Rate by Income Level and City Size

Figure 80: Homeownership Rate by Income Level and City Size



2) Overall Homeownership Rates

Prompt: Provide city-level data on overall homeownership rates from prior analysis.

Data: We use HUD's Comprehensive Housing Affordability Strategy (CHAS) data which relies on 2017-2021 ACS 5-Year estimates.

Data Limitations: This data lag should be considered when using these findings -- they are effectively showing pre-pandemic patterns, but this is the only dataset available for this analysis statewide. The CHAS dataset provides estimates for total owner and renter households by income bin. These income bins (HAMFI) are the median family income calculated by HUD for each jurisdiction, to determine Fair Market Rents (FMRs) and income limits for HUD programs. The data visualization uses point estimates to display the interquartile range by region or size. It is not possible to include the margin of error (MOE) for the estimate because each individual point has its own MOE and including the MOE for each would obscure the desired outcome of understanding the range and its midpoint. If you were to provide MOE per each point, it might increase the perceived variance by region.

Some OHNA regions are made up of less than a handful of cities with populations greater than 10,000. The interquartile range (for the box and whisker plot) in such cases, simply visualizes the range of the few points.

Patterns: Median overall homeownership is higher in the Metro region and cities greater than 25k population, however the range in general is not all that different between different regions and city sizes.

Figure 81: Overall Homeownership Rate by City Size

Group	Owner Occupied Units	Share of Total Units
10k-25k	72,845	58%
Metro or >25K	506,560	56%

Figure 82: Overall Homeownership Rate by OHNA Region

Region	Owner Occupied Units	Share of Total Units
Central	35,560	62%
Metro	311,670	57%
Northeast	16,780	60%
Northern Coast	5,370	56%
Southeast	6,490	48%
Southwest	49,755	56%
Willamette Valley	153,780	54%

Figure 83: Overall Homeownership Rate by City Size

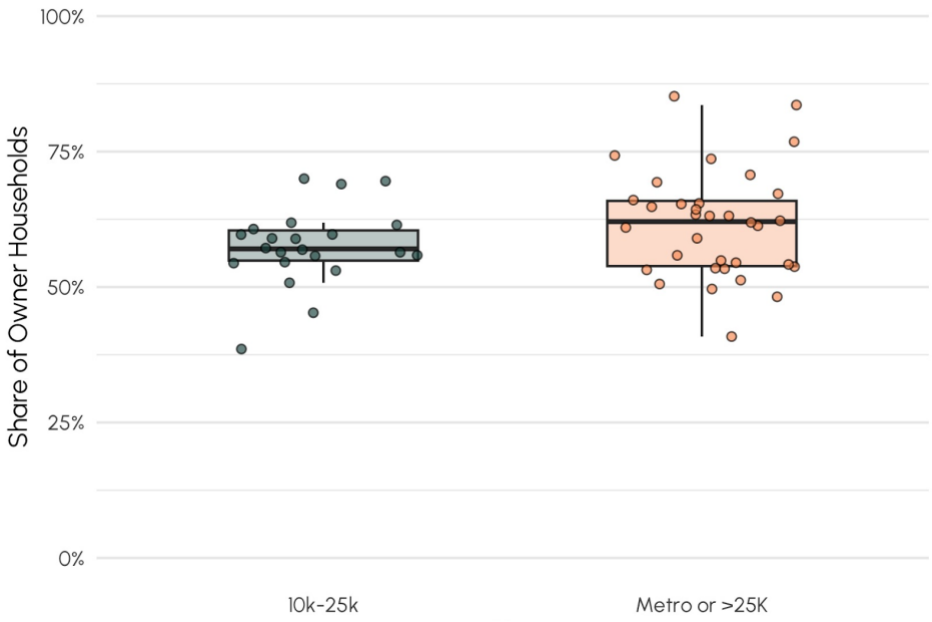
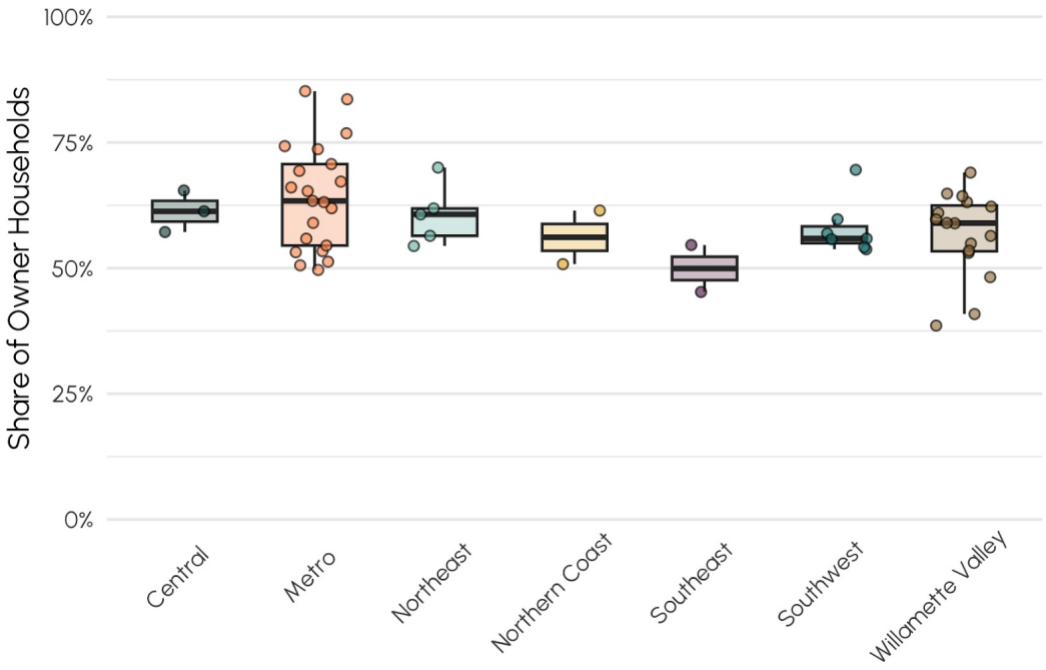


Figure 84: Overall Homeownership Rate by OHNA Region



3) Ownership units by type, affordability, and new construction

Prompt: Provide data on type mix of **ownership** units affordable at each income bracket, cross-tabbed by existing stock vs. new construction. Has there been a shift in what the market produces for ownership units in terms of housing type? How does this factor into affordability?

Data source: 2023 PUMS 5-year

Limitations: Cross-tabbing by region results in too many unreliable estimates, and no meaningful patterns for anything by SFD ownership units (and not much regional difference). We calculated a rule-of-thumb statistical reliability test - estimates for which the standard error is more than 30% of the estimated value are classified unreliable and are not shown on charts derived from PUMS. PUMS schema limits us to using 2010 or 2020 as breakpoints for "new construction" definition; we go with 2010 because it affords greater statistical reliability.

Potentially reliable patterns by region and/or city size: New construction (built since 2010) ownership units are still overwhelmingly SFD, but middle housing unit production has increased to the point that it is nearly twice as prevalent as it is among existing ownership units (increasing from 5% to 9%). 5+-unit ownership units make up a very small portion of both existing and new stock, sitting at 2% of each. In terms of affordability, there is little difference between the affordability of middle versus 5+ multi-unit ownership units, both are roughly equal in terms of the share of stock that is priced at 100% AMI or more.

Figure 85: Ownership Units by Housing Type (Existing and New Construction)

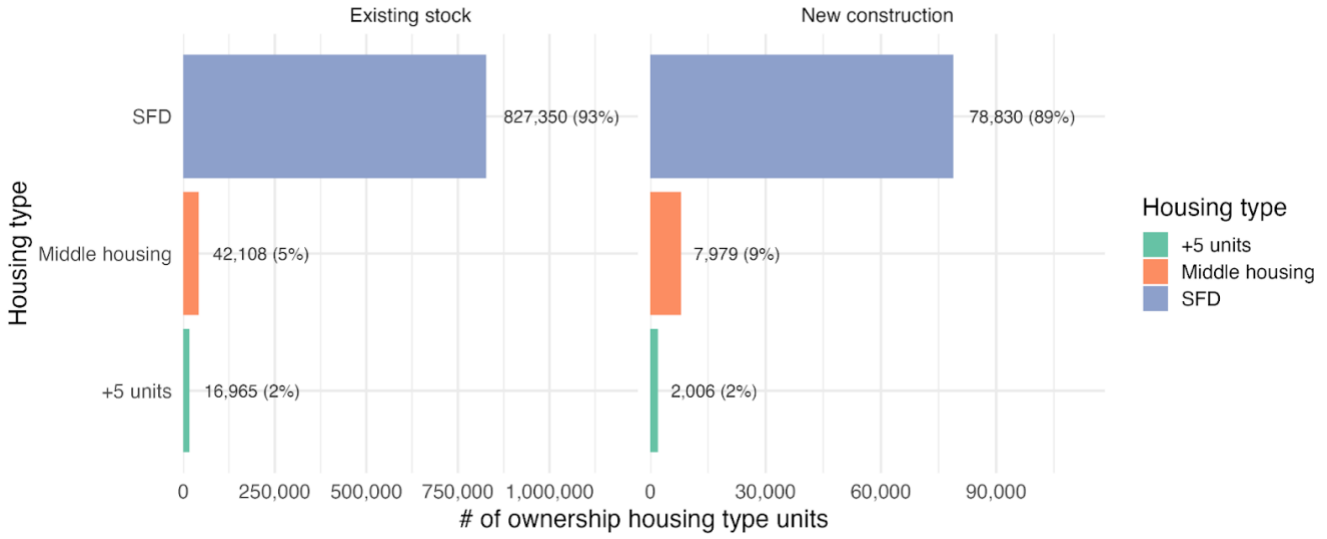
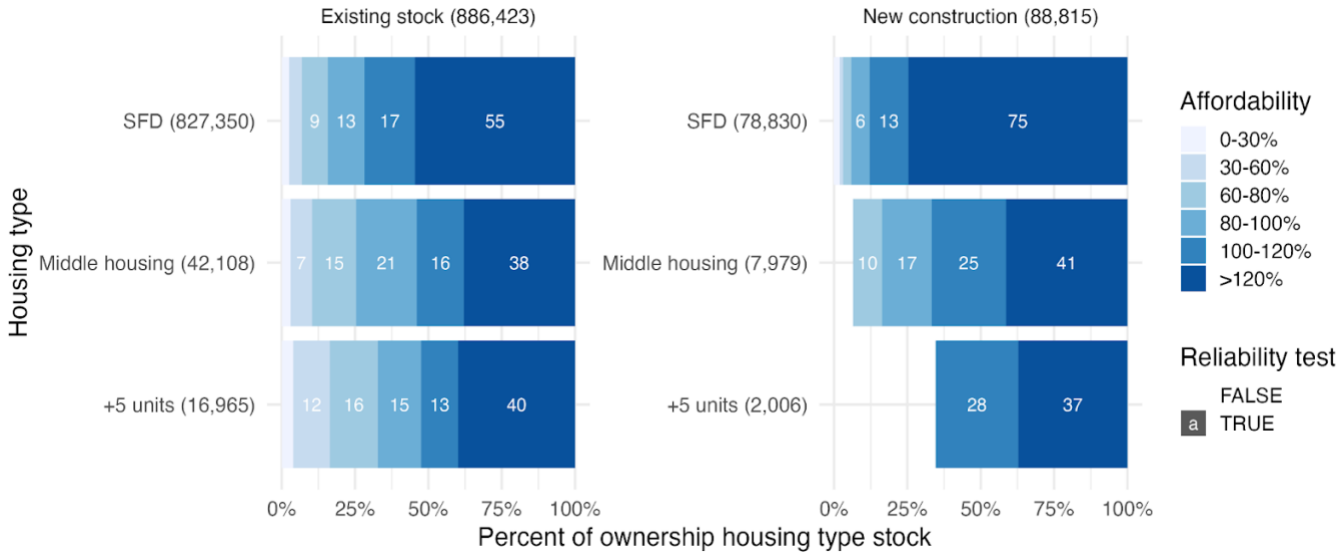
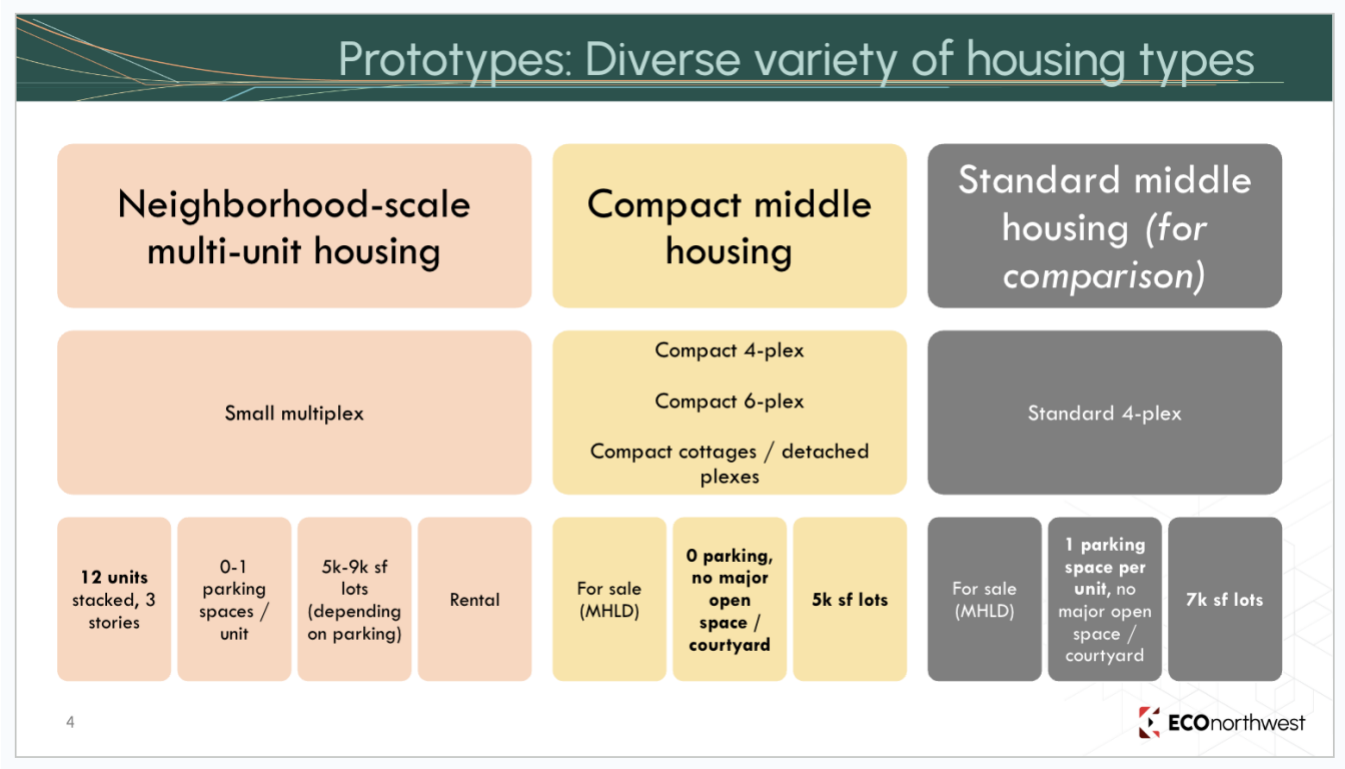


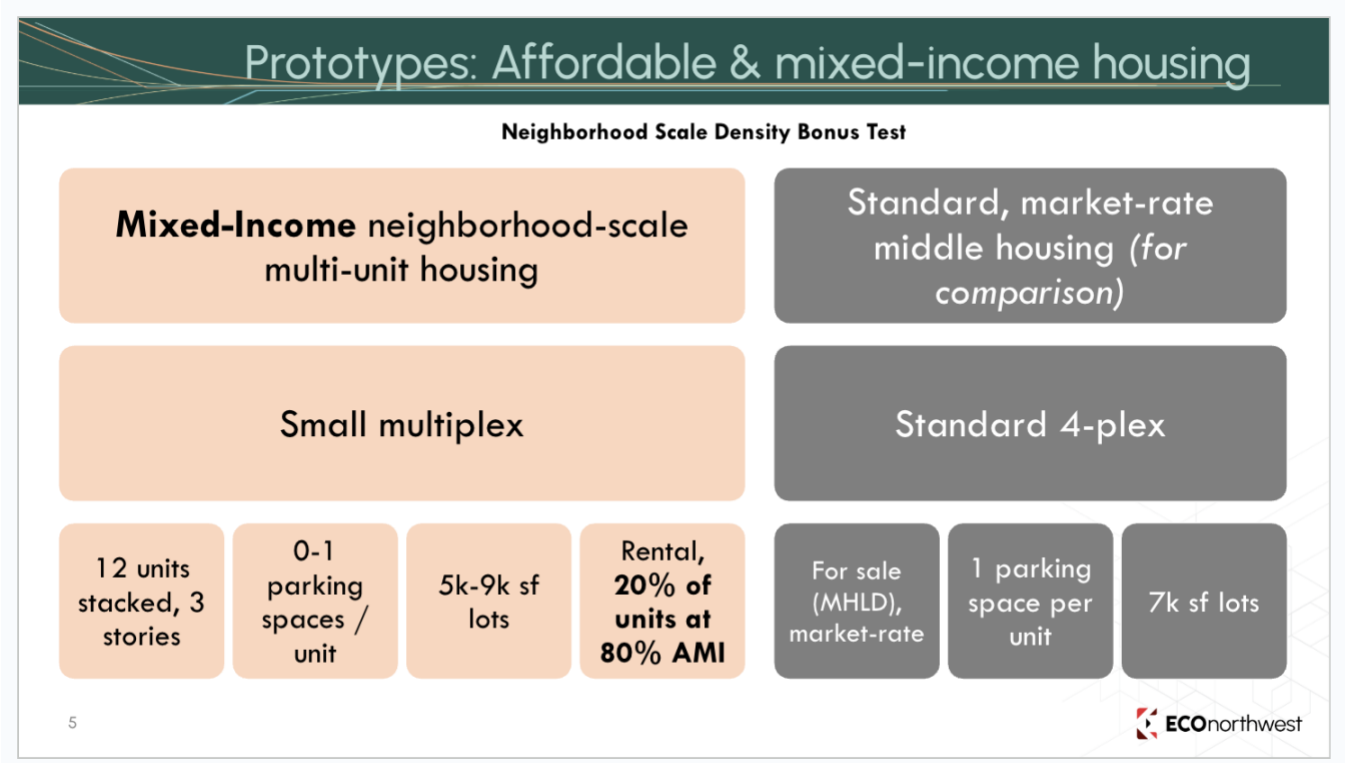
Figure 86: Ownership Units by Housing Type and Affordability (Existing and New Construction)



HPS Research Appendix

This appendix provides additional detail on the assumptions, approach, and findings from the feasibility and zoning analyses conducted to develop the HPS findings and recommendations. The information was initially summarized in slide deck format and has been incorporated into this appendix in that form.




Prototypes: Affordable & mixed-income housing
Neighborhood Scale Density Bonus Test
Mixed-Income neighborhood-scale multi-unit housing
Standard, market-rate middle housing (for comparison)
Small multiplex
Standard 4-plex
12 units stacked, 3 stories
0-1 parking spaces / unit
5k-9k sf lots
Rental, 20% of units at 80% AMI
For sale (MHLD), market-rate
1 parking space per unit
7k sf lots
5
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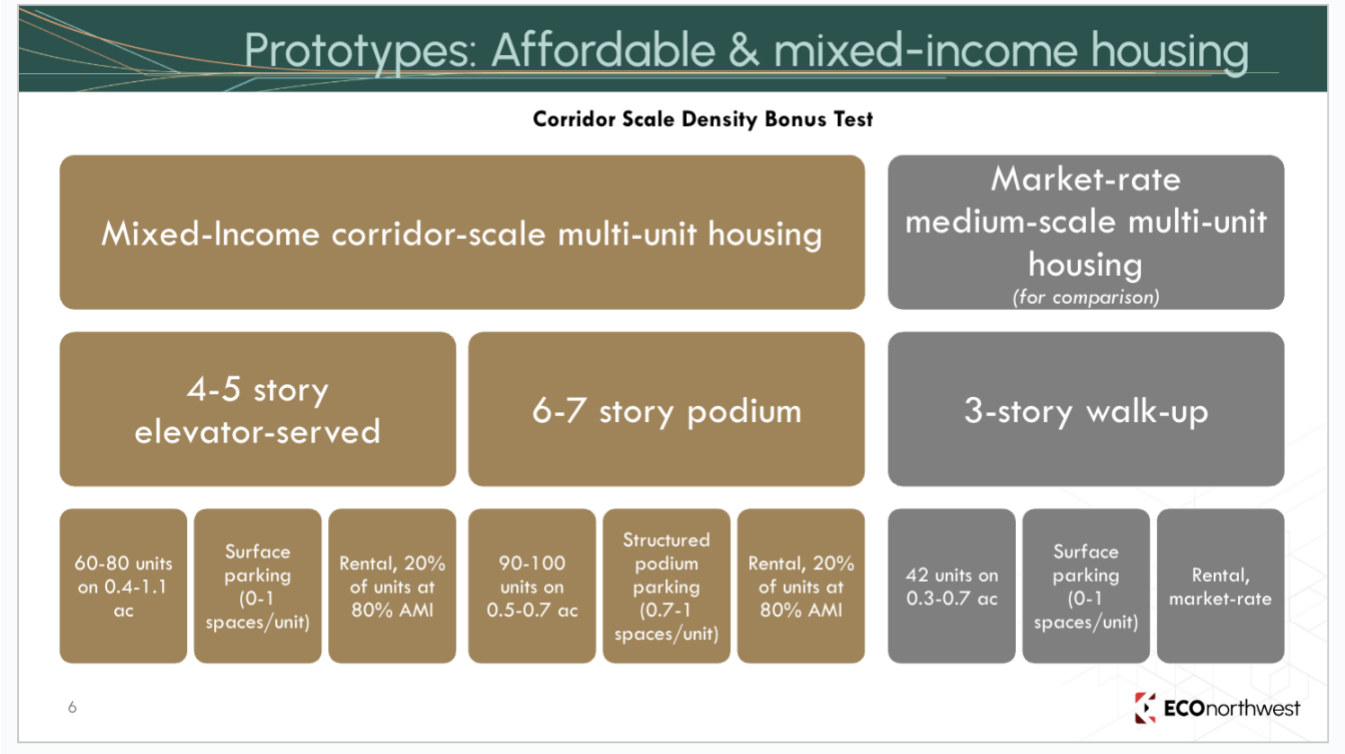
Prototypes: Affordable & mixed-income housing
Corridor Scale Density Bonus Test
Mixed-Income corridor-scale multi-unit housing
Market-rate medium-scale multi-unit housing
(for comparison)
4-5 story elevator-served
6-7 story podium
3-story walk-up
60-80 units on 0.4-1.1 ac
Surface parking (0-1 spaces/unit)
Rental, 20% of units at 80% AMI
90-100 units on 0.5-0.7 ac
Structured podium parking (0.7-1 spaces/unit)
Rental, 20% of units at 80% AMI
42 units on 0.3-0.7 ac
Surface parking (0-1 spaces/unit)
Rental, market-rate
6
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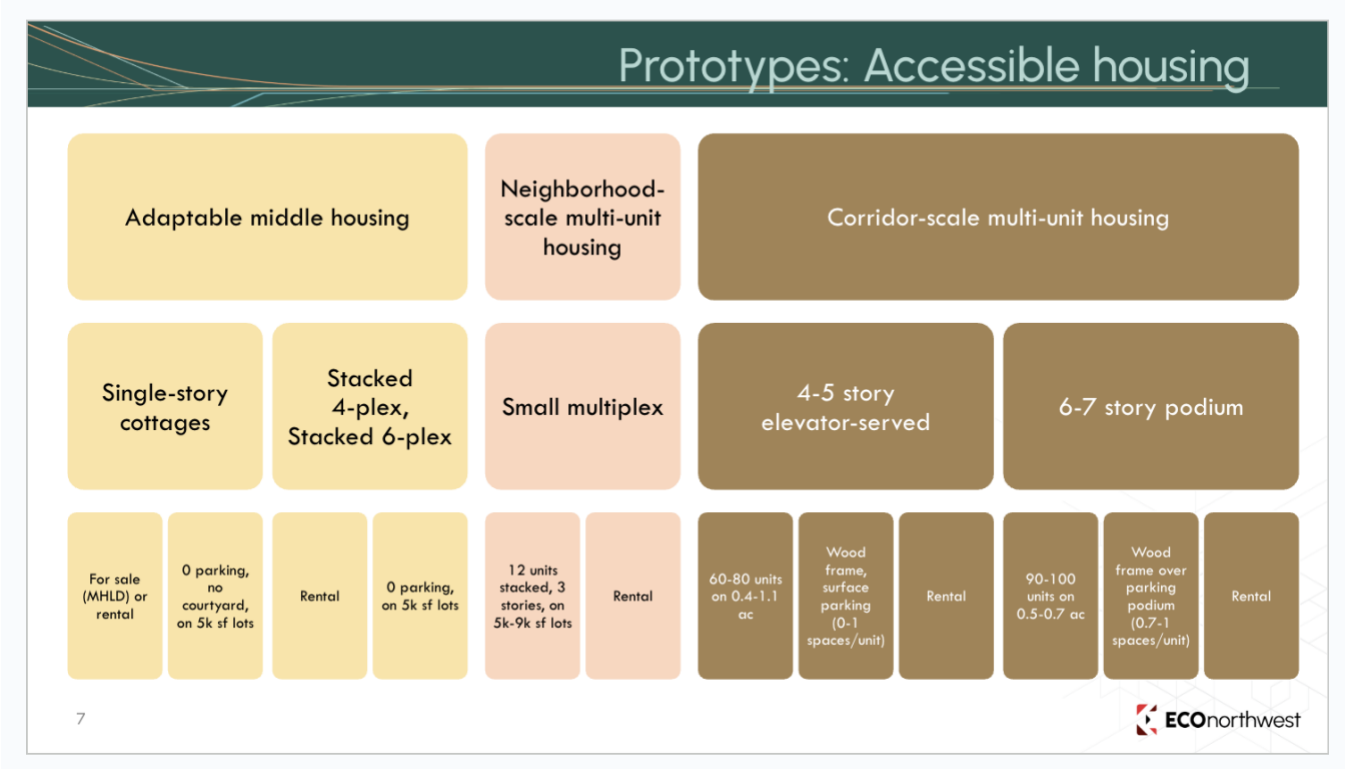
Prototypes: Accessible housing
Adaptable middle housing
Neighborhood-scale multi-unit housing
Corridor-scale multi-unit housing
Single-story cottages
Stacked 4-plex, Stacked 6-plex
Small multiplex
4-5 story elevator-served
6-7 story podium
For sale (MHLD) or rental
0 parking, no courtyard, on 5k sf lots
Rental
0 parking, on 5k sf lots
12 units stacked, 3 stories, on 5k-9k sf lots
Rental
60-80 units on 0.4-1.1 ac
Wood frame, surface parking (0-1 spaces/unit)
Rental
90-100 units on 0.5-0.7 ac
Wood frame over parking podium (0.7-1 spaces/unit)
Rental
7
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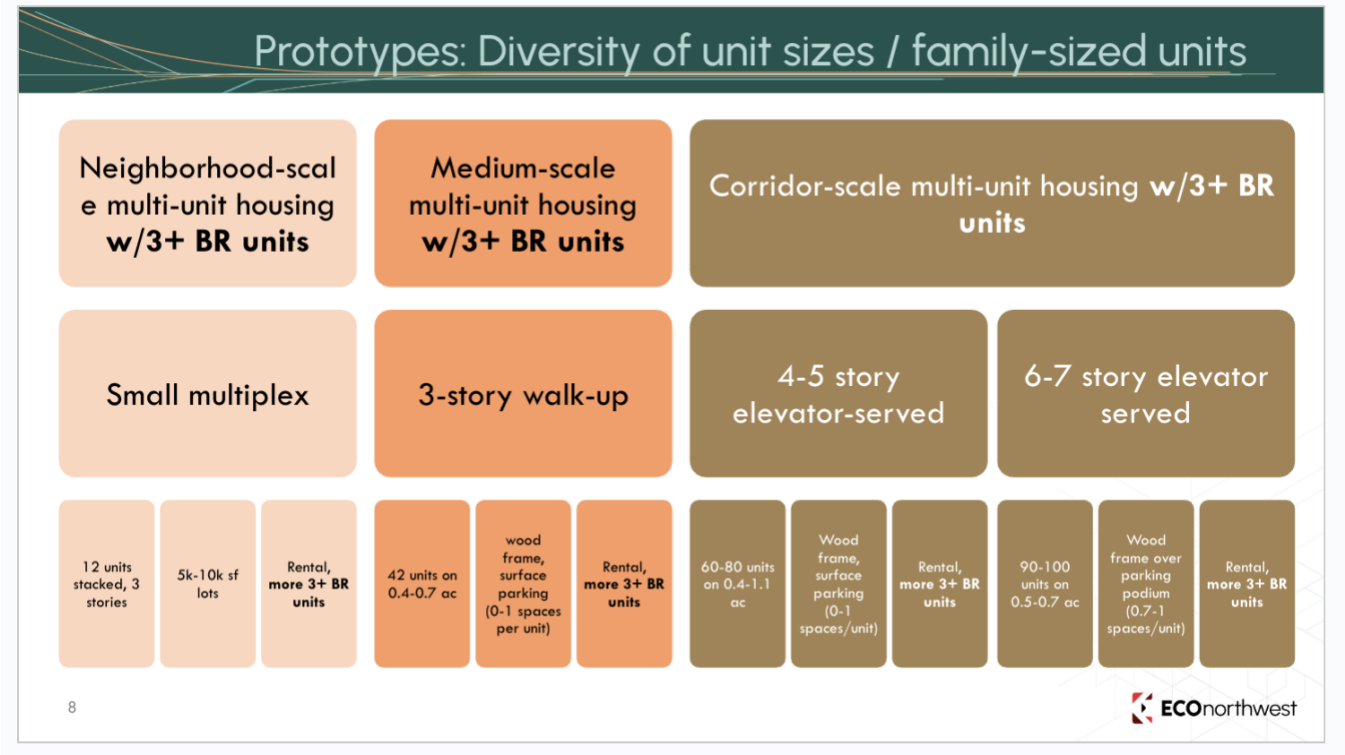
Prototypes: Diversity of unit sizes / family-sized units
Neighborhood-scale multi-unit housing w/3+ BR units
Medium-scale multi-unit housing w/3+ BR units
Corridor-scale multi-unit housing w/3+ BR units
Small multiplex
3-story walk-up
4-5 story elevator-served
6-7 story elevator served
12 units stacked, 3 stories
5k-10k sf lots
Rental, more 3+ BR units
42 units on 0.4-0.7 ac
wood frame, surface parking (0-1 spaces per unit)
Rental, more 3+ BR units
60-80 units on 0.4-1.1 ac
Wood frame, surface parking (0-1 spaces/unit)
Rental, more 3+ BR units
90-100 units on 0.5-0.7 ac
Wood frame over parking podium (0.7-1 spaces/unit)
Rental, more 3+ BR units
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Feasibility Analysis Approach

9

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Financial Feasibility Constrains Housing Supply

Expending political will on upzoning Manhattan, Kansas to allow Manhattan, New York skyscrapers, does NOT mean that developers would build structures that are financially infeasible

10

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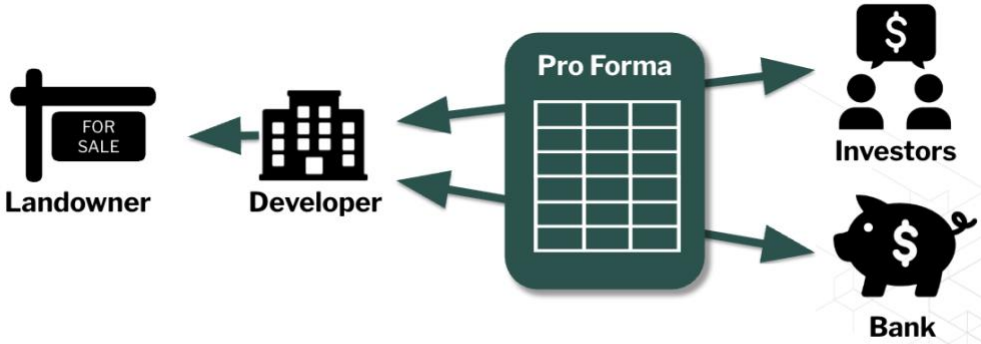
Feasibility Communicated Through Pro Formas

One can evaluate policies through the decision-making tools of developers: **pro forma models**



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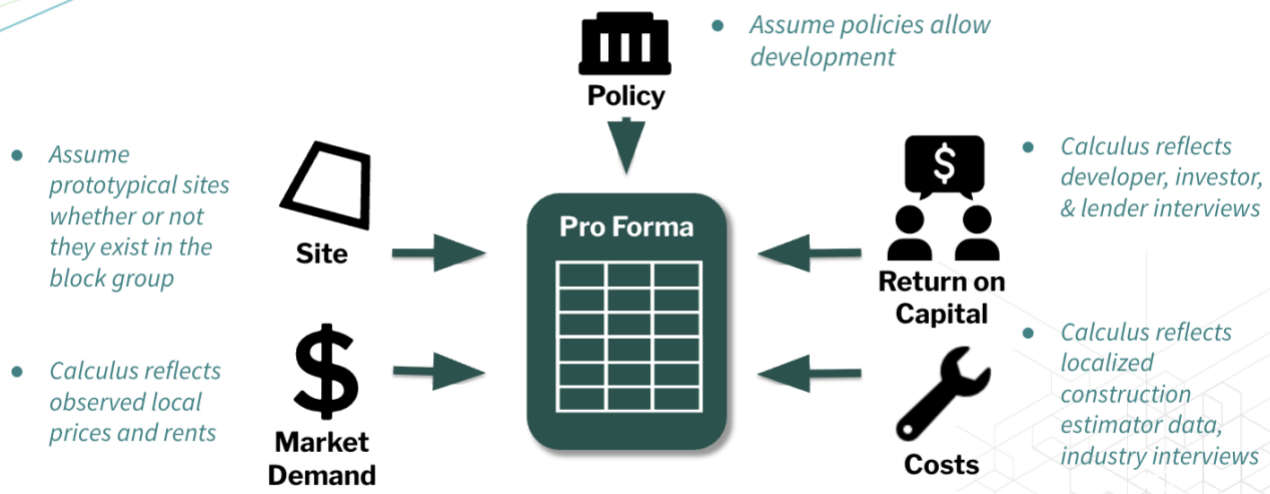
Pro Formas Sensitive to Many Localized Factors



- *Assume policies allow development*
- *Assume prototypical sites whether or not they exist in the block group*
- *Calculus reflects observed local prices and rents*
- *Calculus reflects developer, investor, & lender interviews*
- *Calculus reflects localized construction estimator data, industry interviews*

12

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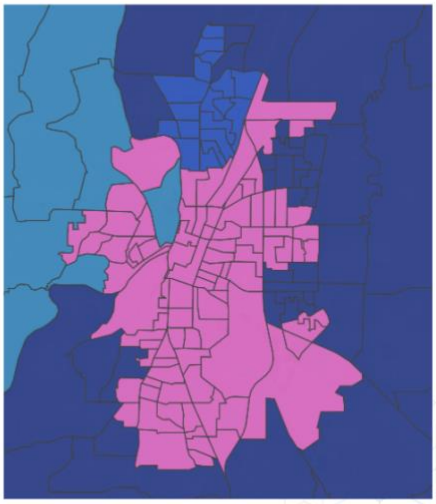
Assessment Considers Policy Geographies

- Assign block groups to jurisdictions and their OHNA categories (e.g., 10K-25K population)
  - Some very small jurisdictions (<10,000) were not included in the analysis
- Assign block groups to UGB opportunity areas (e.g., High asset, Low Harm)



Salem (pink) and Keizer (royal blue) block groups assigned to 'Metro or >25K' category

13

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Feasibility Analysis Tests Prototypical Developments

- Test financial feasibility of prototype developments on typical sites under local (block group) market conditions whether or not such sites exist in that geography
  - Single-unit-sized site prices defined by local home prices
  - Larger 3+ story multi-unit site prices defined by estimated local commercial values

Duplex

Townhomes

Small Multifamily

Large Multifamily

14

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Prototype Variants

Varied the three multifamily prototypes by unit size, parking, and affordability

- Neighborhood-scale multi-unit
- Medium-scale multi-unit
- Corridor-scale multi-unit

1. Family-sized Units

Multi-Unit Mix	Typical	Family-sized
Studio	19%	10%
1-Bedroom	40%	35%
2-Bedroom	35%	35%
3-Bedroom	6%	20%

2. Parking Provision

- Considered 0, 0.5, and 1 parking stall per multifamily unit

3. Affordable Units

- Considered deed restrictions on 20% of units targeting to households making 80% or less of area median income

15

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Market Scenarios

Little housing development feasible under current conditions
Also consider highly optimistic inputs that yield some feasibility

Variable	Baseline Inputs	Favorable Inputs	Action
Adaptable Design Cost Premium (% change in hard cost)	0%	0%	Adds hard cost
Adjust Construction Costs (% change in hard costs)	0%	-10%	Adjusts local construction hard costs
Adjust Purchase Price (% change from local $/sqft)	0%	10%	Adjusts purchase prices
Mortgage Interest Rate (APR)	6.5%	5.5%	Influences valuation of for-sale affordable units
New Construction Multifamily CAP Rate Premium (in basis points)	-50 bps	-150 bps	Reduced CAP rates reflect lower long term interest rates and lower perceived risk of investment (Recent CBRE Multifamily CAP Rates for PDX = 6.00)
Rent/Price Impact of Relatively Low Parking (% change)	-10%	0%	Adjusts purchase prices and rents by percent input by user

Applicable for All Results Reported Here

16

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2. Feasibility Analysis Results

Diverse variety of housing types

- Neighborhood-scale multi-unit housing
- Compact middle housing

% of cities and % of block groups where development might optimistically be feasible if allowed

Prototype	Medium Cities: Anywhere	Medium Cities: High Asset, Low Harm Areas	Large & Metro Cities (ex PDX): Anywhere	Large & Metro Cities (ex PDX): High Asset, Low Harm Areas	PDX: High Asset, Low Harm Areas
Compact cottages/detached plexes	24% cities 4% BG	24% cities 5% BG	76% cities 30% BG	68% cities 34% BG	86% BG
Compact quadplex	0% cities 0% BG	0% cities 0% BG	6% cities 1% BG	3% cities 0-1% BG	0-1% BG
Compact sixplex	0% cities 0% BG	0% cities 0% BG	12% cities 2% BG	6% cities 2% BG	2% BG
Neighborhood-scale multi-unit	4-8% cities 0-1% BG	4% cities 1% BG	44% cities 9% BG	41% cities 11-12% BG	47-51% BG
	More feasible with lower parking ratios				

17

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2. Feasibility Analysis Results

Affordable & mixed-income housing

- Mixed-income neighborhood-scale multi-unit
- Mixed-income corridor-scale multi-unit housing

% of cities and % of block groups where development might optimistically be feasible if allowed

Prototype	Medium Cities: Anywhere	Medium Cities: High Asset, Low Harm Areas	Large & Metro Cities (ex PDX): Anywhere	Large & Metro Cities (ex PDX): High Asset, Low Harm Areas	PDX: High Asset, Low Harm Areas
Mixed-income neighborhood-scale multi-unit (A)	0% cities 0% BG	0% cities 0% BG	26-32% cities 5-6% BG	24-29% cities 7% BG	36-40% BG
More feasible than standard quadplex?	0% cities 0% BG	0% cities 0% BG	26-32% cities 5-6% BG	5-6% cities 7% BG	36-40% BG
Mixed-income corridor-scale multi-unit (C)	0% cities 0% BG	0% cities 0% BG	6-32% cities 1-6% BG	6-29% cities 1-7% BG	4-44% BG
More feasible than medium-scale multi-unit (B)?	0% cities 0% BG	0% cities 0% BG	0-6% cities [5 & 6 stories only] 0-2% BG	0-6% cities [5 & 6 stories only] 0-2% BG	0-6% BG

18

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2. Feasibility Analysis Results

Accessible housing

- Adaptable middle housing
- Neighborhood-scale multi-unit housing
- 4+ story multi-unit housing

% of cities and % of block groups where development might optimistically be feasible if allowed

Prototype	Medium Cities: Anywhere	Medium Cities: High Asset, Low Harm Areas	Large & Metro Cities (ex PDX): Anywhere	Large & Metro Cities (ex PDX): High Asset, Low Harm Areas	PDX: High Asset, Low Harm Areas
Adaptable cottages/detached plexes	16% cities 3% BG	16% cities 4% BG	68% cities 19% BG	56% cities 22% BG	77% BG
Stacked quadplex	4% cities Y% BG	4% cities 1% BG	41% cities Y% BG	38% cities 10% BG	37% BG
Stacked sixplex	12% cities 0-1% BG	8% cities 2% BG	44% cities 8% BG	41% cities 12% BG	52% BG
Neighborhood-scale multi-unit	4-8% cities 0-1% BG	4% cities 1% BG	44% cities 9% BG	41% cities 11-12% BG	47-51% BG
Corridor-scale (4+ story) multi-unit	0-8% cities 0-1% BG	0-4% cities 0-1% BG	15-44% cities 3-12% BG	15-41% cities 3-12% BG	7-53% BG
	Feasible with 5-stories & zero parking		More feasible with fewer stories; lower parking ratios		

19

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2. Feasibility Analysis Results

Diversity of unit sizes / family-sized units

- Multi-unit housing with 3+ bedroom units

% of cities and % of block groups where development might optimistically be feasible if allowed

Prototype	Medium Cities: Anywhere	Medium Cities: High Asset, Low Harm Areas	Large & Metro Cities (ex. PDX): Anywhere	Large & Metro Cities (ex. PDX): High Asset, Low Harm Areas	PDX: High Asset, Low Harm Areas
Neighborhood-scale multi-unit with 3+ BR	0-4% cities 0-1% BG	0-4% cities 0-1% BG	41% cities 8% BG	38% cities 10% BG	41-43% BG
Feasible as bonus for neighborhood-scale?	0-4% cities 0-1% BG	0-4% cities 0-1% BG	41% cities 8% BG	38% cities 10% BG	41-43% BG
Medium-scale multi-unit with 3+ BR	0-8% cities 0-1% BG	0-4% cities 0-1% BG	38-44% cities 7-9% BG	35-41% cities 10-12% BG	42-52% BG
Corridor-scale multi-unit with 3+ BR	0% cities 0% BG	0% cities 0% BG	9-38% cities 2-7% BG	9-35% cities 2-9% BG	5-39% BG
Feasible as bonus for corridor-scale?	0% cities 0% BG	0% cities 0% BG	3-26% cities 0-4% BG	3-24% cities 0-5% BG	2-19% BG
	Most feasible at 5-stories; Generally more feasible with less parking				

20

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Zoning Analysis Approach

21

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3. Zoning Analysis Approach

1. **Obtained GIS data of zoning from city web maps for 4 example cities**
   - Eugene
   - Salem
   - Hood River
   - Ashland
2. **Calculated acreage and percent of total acreage by zone**
3. **Reviewed city zoning codes to collect and code key attributes of zones that allow housing such as:**
   - allowed uses/housing types
   - max height
   - minimum lot size, density minimum and maximums (DU/AC and FAR)
   - building / lot / impervious coverage maximums, minimum open space/landscaping
   - minimum parking ratios
4. **Compared same prototypes as feasibility analysis to these standards to determine if they would likely be allowed**
   - Included modest tolerance ranges (i.e., 10%) for density and impervious coverage
   - Did not review setbacks, step-backs, detailed design standards, bonus entitlements, etc.
5. **Summarized % of acres within the city where a given prototype is likely allowed**
   - Some prototypes have multiple variations that were checked separately, resulting in a range of acreages depending on the prototype details (e.g., parking ratio)

22

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3. Zoning Analysis Results: Tualatin

Row Labels	Min of % of Acres	Average of % of Acres	Max of % of Acres
Adaptable MH	6%	7%	7%
Adaptable Cottages	7%	7%	7%
SF with two ADUs	6%	6%	6%
Stacked Quadplex	7%	7%	7%
Stacked Sixplex	7%	7%	7%
Compact MH	1%	3%	7%
Compact cottages	7%	7%	7%
Compact Quadplex (townhomes)	1%	1%	1%
Compact Sixplex (townhomes)	1%	1%	1%
Corridor-scale multi-unit	0%	0%	0%
Multiunit Corridor Scale 4-story	0%	0%	0%
Multiunit Corridor Scale 5-story	0%	0%	0%
Multiunit Corridor Scale 6-story	0%	0%	0%
Multiunit Corridor Scale 7-story	0%	0%	0%
Medium-scale multi-unit	0%	0%	0%
Multiunit Medium Scale	0%	0%	0%
Neighborhood-scale multi-unit	0%	0%	0%
Multiunit Neighborhood scale	0%	0%	0%
Standard	6%	27%	47%
Duplex with 1-Car Garages	9%	9%	9%
SF with 2-Car Garages	6%	6%	6%
Standard Cottages	47%	47%	47%
Standard Side-by-Side quadplex	47%	47%	47%
Grand Total	**0%**	**4%**	**47%**

Notes:

- Standard middle housing, compact middle housing, and adaptable middle housing are broadly allowed, but not 6-plexes
- Narrow (and low) allowed density ranges for multi-unit housing preclude most multi-unit prototypes in most zones, including a "High Density High Rise Residential" zone
- No min parking requirements citywide

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23

3. Zoning Analysis Results: Salem

Row Labels	Min of % of Acres	Average of % of Acres	Max of % of Acres
Adaptable MH	7%	23%	41%
Adaptable Cottages	7%	7%	7%
SF with two ADUs	41%	41%	41%
Stacked Quadplex	38%	38%	38%
Stacked Sixplex	7%	7%	7%
Compact MH	7%	7%	7%
Compact cottages	7%	7%	7%
Compact Quadplex (townhomes)	7%	7%	7%
Compact Sixplex (townhomes)	7%	7%	7%
Corridor-scale multi-unit	0%	6%	7%
Multiunit Corridor Scale 4-story	7%	7%	7%
Multiunit Corridor Scale 5-story	7%	7%	7%
Multiunit Corridor Scale 6-story	6%	6%	6%
Multiunit Corridor Scale 7-story	0%	0%	0%
Medium-scale multi-unit	7%	7%	7%
Multiunit Medium Scale	7%	7%	7%
Neighborhood-scale multi-unit	7%	7%	7%
Multiunit Neighborhood scale	7%	7%	7%
Standard	42%	51%	56%
Duplex with 1-Car Garages	50%	50%	50%
SF with 2-Car Garages	42%	42%	42%
Standard Cottages	56%	56%	56%
Standard Side-by-Side quadplex	56%	56%	56%
Grand Total	**0%**	**12%**	**56%**

Notes:

- Standard middle housing, compact middle housing, and adaptable middle housing are broadly allowed, but 6-plexes are generally limited to areas that allow multi-unit
- Multi-unit prototypes are generally allowed only in commercial / mixed-use zones due to max density, height limits, and/or open space requirements in residential zones
- No min parking requirements citywide

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24

3. Zoning Analysis Results: Hood River

Row Labels	Min of % of Acres	Average of % of Acres	Max of % of Acres
Adaptable MH	0%	0%	0%
Adaptable Cottages	0%	0%	0%
SF with two ADUs	0%	0%	0%
Stacked Quadplex	0%	0%	0%
Stacked Sixplex	0%	0%	0%
Compact MH	0%	0%	0%
Compact cottages	0%	0%	0%
Compact Quadplex (townhomes)	0%	0%	0%
Compact Sixplex (townhomes)	0%	0%	0%
Corridor-scale multi-unit	0%	0%	0%
Multiunit Corridor Scale 4-story	0%	0%	0%
Multiunit Corridor Scale 5-story	0%	0%	0%
Multiunit Corridor Scale 6-story	0%	0%	0%
Multiunit Corridor Scale 7-story	0%	0%	0%
Medium-scale multi-unit	0%	0%	0%
Multiunit Medium Scale	0%	0%	0%
Neighborhood-scale multi-unit	0%	0%	0%
Multiunit Neighborhood scale	0%	0%	0%
Standard	0%	22%	47%
Duplex with 1-Car Garages	47%	47%	47%
SF with 2-Car Garages	41%	41%	41%
Standard Cottages	0%	0%	0%
Standard Side-by-Side quadplex	0%	0%	0%
Grand Total	**0%**	**2%**	**47%**

Notes:

- Parking requirements preclude the multi-unit prototypes analyzed in all zones
- Not subject to middle housing requirements beyond duplexes - while middle housing is allowed in all residential zones, open space requirements, lot coverage and in some cases max density preclude the prototypes analyzed
- Max density limits and heights preclude taller and denser multi-unit housing

25

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3. Zoning Analysis Results: Ashland

Row Labels	Min of % of Acres	Average of % of Acres	Max of % of Acres
Adaptable MH	0%	2%	5%
Adaptable Cottages	0%	0%	0%
SF with two ADUs	5%	5%	5%
Stacked Quadplex	1%	1%	1%
Stacked Sixplex	1%	1%	1%
Compact MH	0%	1%	1%
Compact cottages	0%	0%	0%
Compact Quadplex (townhomes)	1%	1%	1%
Compact Sixplex (townhomes)	1%	1%	1%
Corridor-scale multi-unit	0%	0%	0%
Multiunit Corridor Scale 4-story	0%	0%	0%
Multiunit Corridor Scale 5-story	0%	0%	0%
Multiunit Corridor Scale 6-story	0%	0%	0%
Multiunit Corridor Scale 7-story	0%	0%	0%
Medium-scale multi-unit	0%	0%	1%
Multiunit Medium Scale	0%	0%	1%
Neighborhood-scale multi-unit	0%	0%	1%
Multiunit Neighborhood scale	0%	0%	1%
Standard	0%	14%	44%
Duplex with 1-Car Garages	8%	8%	8%
SF with 2-Car Garages	44%	44%	44%
Standard Cottages	0%	0%	0%
Standard Side-by-Side quadplex	5%	5%	5%
Grand Total	**0%**	**2%**	**44%**

Notes:

- Not subject to middle housing requirements beyond duplexes - while other middle housing types are allowed in some residential zones, max density, lot coverage, and landscaping requirements preclude the prototypes analyzed
- Max density limits and heights preclude taller and denser multi-unit housing

26

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