



Oregon

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February 4, 2026

Don Hardy, Planning Director
222 NE 2nd Ave,
Canby, OR 97013
Sent via e-mail



RE: Review of City of Canby Housing Production Strategy

Dear Planning Director Hardy,

On October 21, 2025, the Department of Land Conservation and Development (DLCD or department) received a submittal from the City of Canby notifying the department of the adoption of the city's Housing Production Strategy (HPS). Per Oregon Revised Statute (ORS) 197A.103(4), the department posted the city's HPS for a 45-day public comment period on October 24, 2025. Upon the close of the public comment period on December 8, 2025, the department received [one comment](#) on the city's HPS.

Per ORS 197A.103(6) (formerly ORS 197.291(6)), the department must review the city's submittal to determine whether to:

1. Approve the Housing Production Strategy Report;
2. Approve the Housing Production Strategy Report, subject to further city review and actions as recommended by the department; or
3. Remand the Housing Production Strategy Report for further modification as identified by the department.

The department is required to complete this review and issue a decision within 120 days of the city submittal. In the case of the City of Canby's Housing Production Strategy, the department must make a final decision by February 21, 2026. Per ORS 197A.103(7) (formerly ORS 197.291(7)), the department's decision is final and may not be appealed.

Based on the department's review of the City of Canby's Housing Production Strategy against the review criteria established in Oregon Administrative Rule (OAR) 660-008 as it was in effect prior to amendments adopted by the Land Conservation and Development Commission in December 2024, which remains applicable to this review pursuant to Oregon Laws 2023, chapter 13, section 9(4), compiled as a note after ORS 197A.025 section 9(4), the department approves the city's Housing Production Strategy Report with two conditions described below.

As part of the department's review of the City of Canby's HPS, staff evaluated the city's adopted actions against the applicable statutory requirements in ORS 197. The city was actively developing its Housing Capacity Analysis (HCA) and HPS at the time House Bill 2001 (2023) was enacted. Anticipating such situations, HB 2001 included provisions allowing the Land

Conservation and Development Commission (LCDC) to allow cities to continue operating under the statutes and rules in effect prior to the bill's changes. Specifically, Oregon Laws 2023, chapter 13, section 9(4), compiled as a note after ORS 197A.025(9)(4) provides:

To avoid interference with current planning activities or to avoid unjust or surprising results, the Land Conservation and Development Commission may postpone, for cities specified by the commission, the applicability of section 13 [ORS 197A.210], 21 [ORS 197A.280], 22 [ORS 197A.270] or 23 [ORS 197A.018], chapter 13, Oregon Laws 2023, and the amendments to ORS 197.286, 197.290, 197.296 [renumbered ORS 197A.350], 197.297 [renumbered ORS 197A.335] and 197.303 [renumbered ORS 197A.348] by sections 12 and 25 to 28, chapter 13, Oregon Laws 2023, until a date that is not later than January 1, 2027.

Accordingly, the department reviews the City of Canby's HPS under the applicable statutory framework in ORS 196 and 197, rather than under the updated statutes in ORS 197A (2023).

The review criteria applicable to the City of Canby's HPS are available for reference through the Oregon Secretary of State's Archives Division here:

- *Chapters 196, 197, edition 2021:*
https://www.oregonlegislature.gov/bills_laws/Pages/ORSarchive.aspx
- *Chapter 660, Division 8:*
<https://secure.sos.state.or.us/oard/viewCompDocument.action?compDocRsn=1240>

Department Findings based on OAR 660-008-0050

(1) Contextualized Housing Need – A contextualization and incorporation of information from the most recent Housing Capacity Analysis that describes current and future housing needs in the context of population and market trends.

The City of Canby adopted its HCA in July 2024 and HPS in October 2025, meeting its statutory obligation to adopt these housing planning documents as prescribed by ORS 197A.103 (formerly ORS 197.291).

The city's HCA projected a 20-year housing need of 5,931 over the next 20 years, an average annual growth rate of 1.3%. The expected increase is faster than the statewide average over the same period. In 2019, the city had a Median Family Income (MFI) of \$80,484.

The city's HPS includes a Contextualized Housing Needs (CHN) Analysis as Appendix A, "*Contextualized Housing Needs Memo (2022)*", which provides an overview of the city's demographic and socio-economic characteristics and affordability metrics,

disaggregated by race and ethnicity. In 2020, 17% of the city's population identified as Hispanic or Latino and 11% identified as other residents of color. This information minimally satisfies OAR 660-008-0050(1)(a)(A). The department notes that Oregon Administrative Rules articulate an expectation that the city provide more detailed disaggregation by specific racial and ethnic groups (e.g., Black or African American, Native American, Asian subgroups, Hispanic/Latine, and other multi-racial populations) in the identification of housing needs which are not being met. This will better assist in tracking progress toward equity in housing outcomes. As such, the department expects that the city will conduct the analysis in a manner that fully meets the obligations described in Administrative Rules when adopting future Contextualized Housing Needs findings.

OAR 660-008-0050(1)(a)(B) requires a description of measures the city has already adopted to promote the development of Needed Housing. Appendix A of the city's HPS includes a section titled "*Past Actions by the City to Meet Housing Needs*", satisfying this rule requirement.

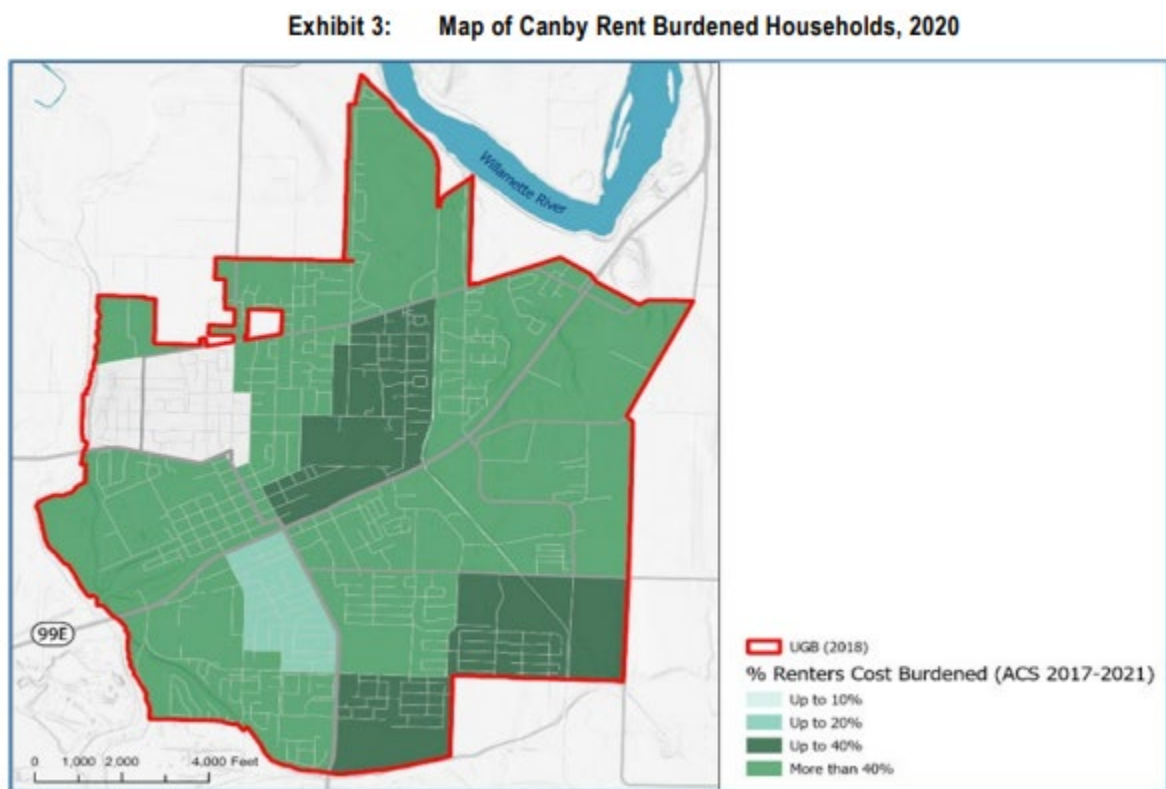
Appendix A contains a section titled "*Market Observations*" which states that there is a desire for more diverse housing types with accessible features, that there is a need for more intergenerational and entry-level homes, and that the city should take steps to incentivize affordable housing development. It also notes that there is a misalignment between what local service workers can afford in rent, which ranges from \$1,200 to \$1,400 per month, and what the average rent is, which is around \$1,600 per month. This information satisfies OAR 660-008-0050(1)(a)(C).

Appendix A also includes a section titled "*Regulatory Observations*". It identifies barriers to the development of Needed Housing, including a lack of incentives and guidance to developers, regulatory requirements such as roadway right-of-way and design standards, System Development Charge (SDC) fees, and minimum lot width regulations. It also notes that the city's R-2 zoning offers helpful flexibility and that greater housing density and diversity is desired in the Downtown area. This information satisfies OAR 660-008-0050(1)(a)(D).

The Appendix A section titled "*Homeless Residents*", reports that in the 2023 Clackamas County point-in-time count, 410 people were experiencing homelessness, of whom 178 were unsheltered, 182 were sheltered, and 50 were in transitional housing. McKinney-Vento Act data found that 125 students in Canby School District 89 were experiencing homelessness or housing insecurity during the 2021-2022 school year. This information satisfies OAR 660-008-0050(1)(a)(E).

Appendix A contains a chart titled “*Exhibit 4: Cost Burdened Households by Tenure*”. It finds that in 2020, 35% of renters in Canby spent 30%-50% of their income toward housing costs, and 17% spent more than half their income. These rates were much higher than homeowners, of whom 21% spent 30%-50% and 7% spent more than half their income. This information satisfies the requirements of OAR 660-008-0050(1)(a)(F).

Chapter two of the city’s HPS also includes the following map, displaying the distribution of cost burdened renter households across the city:



The city’s HCA found that 68% of housing in Canby is owner occupied. The majority of homeowner-occupied units are in single-detached dwelling units, with smaller numbers in mobile and manufactured homes and townhomes/plexes. Among renter-occupied units, a plurality is in multi-unit housing, although many were also in townhomes/plexes and single-detached units. This information satisfies the requirements of OAR 660-008-0050(1)(a)(G).

In 2020, an estimated 13.6% of individuals in Canby had one or more disabilities, below the state’s rate of 14.3% and above Clackamas County’s rate of 12%. Appendix A further states that Clackamas County residents with disabilities are much more likely to be out of

the labor force and have lower median earnings than those without a disability. While this information minimally satisfies the requirements of OAR 660-008-0050(1)(a)(H), the section contains no disaggregation of the types of disability, which is important to understanding the specific housing needs of residents. Similar to the comments above regarding disaggregation by race, the department expects the city's next CHN to provide more detailed disaggregation on disability.

(2) Engagement – A Housing Production Strategy Report must include a narrative summary of the process by which the city engaged Consumers of Needed Housing and Producers of Needed Housing, especially with regard to state and federal protected classes. A city may conduct engagement for a Housing Production Strategy concurrent with other housing planning efforts within the city including, but not limited to, a Housing Capacity Analysis, Consolidated Plans for Community Development Block Grant Entitlement Communities, and public engagement for Severely Rent Burdened Households as described in OAR 813-112-0010.

The city undertook engagement activities as part of the development of the HPS as required by OAR 660-008-0050(2), building on prior housing planning work. This engagement process is summarized in the HPS chapter "*Community Engagement*", as well as Appendix C, "*Engagement Summaries*".

The city conducted interviews with community members and advocates, including staff from Hope Village, staff and clients from the Canby Adult Center, representatives from Bridging Cultures, and members of faith-based communities. Additional interviews were conducted with property owners, market rate and affordable housing developers, a land use attorney, and an apartment complex manager. The city convened a Housing Advisory Committee to develop both the HCA and HPS. In the development of the HCA, a community open house was held in July 2022, and an online public survey was conducted in December 2022. This information satisfies OAR 660-008-0050(2)(a).

The HPS includes descriptions of the findings from the various engagement activities as required by OAR 660-008-0050(2)(b). Key themes that surfaced from the Housing Advisory Committee included a desire to not sacrifice housing quality while pursuing increases in production, investing in infrastructure to unlock more developable land, incentivizing affordable units through density bonuses, and scaling SDCs by unit size. They also urged caution around reducing parking requirements and thoughtfulness on the implementation schedule of housing actions.

The community open house received feedback which included concern that the city would expand into prime farmland, a desire for new design standards, interest in legalizing cottage clusters, problems with the definition and supply of affordable housing,

and the use of Tax Increment Financing (TIF) to pay for infrastructure and reduce SDCs for affordable housing.

The HPS section titled “How was Input Considered?” describes how feedback from the HPS engagement process and past engagement efforts influenced the actions. It specifically names cottage cluster development, targeted multifamily development, scaling SDCs, and downtown mixed-use development as concepts from the engagement activities which were included as HPS actions. This information satisfies OAR 660-008-0050(2)(c).

The HPS section titled “Future Outreach Recommendations” evaluates how the city can improve engagement practices for future housing engagement efforts. The city would like to include more open house meetings, greater outreach to the Hispanic and Latine community, more outreach at community events, and a regular convening of the housing advisory committee. This information satisfies OAR 660-008-0050(2)(d).

Note: As part of the department’s 45-day public comment period initiated in accordance with ORS 197A.103(4), the department received [one comment](#), which was from Housing Land Advocates and Fair Housing Council of Oregon. The commenters commended several actions including Strategy N “System Development Charge (SDC Waiver for Affordable Housing)” and Strategy O “Construction Excise Tax (CET) Waiver”. However, they state that there is a lack of analysis needed to produce fair and equitable housing outcomes and that the definitions used for marginalized communities are inconsistent. They also find a lack of mitigation strategies for identified displacement risks, and a lack of urgency in the implementation schedule for actions.

(3) Strategies to Meet Future Housing Need – A Housing Production Strategy Report must identify a list of specific actions, measures, and policies needed to address housing needs identified in the most recent Housing Capacity Analysis. The strategies proposed by a city must collectively address the next 20-year housing need identified within the most recent Housing Capacity Analysis and contextualized within the Report as provided in section (1). A Housing Production Strategy Report may identify strategies including, but not limited to, those listed in the Housing Production Strategy Guidance for Cities published by the Commission under Exhibit B.

The city’s HPS outlines fifteen actions for implementation within its eight-year HPS cycle to address identified housing needs. Each of the fifteen actions are described in the HPS chapter “*Strategies to Meet Future Needs*” and are as follows:

- A. Develop Process for Identifying Land to Up-Zone
- B. Allow Cottage Clusters in Residential Zones
- C. Identify Opportunities to Streamline Planned Unit Developments (PUDs)
- D. Incentives to Encourage Diverse Housing Development in PUDs

- E. Modify System Development Charge (SDC) Fee Schedules with Scaled Charges Based on Home Size
- F. Land Use Permitting Education for Property Owners/Developers
- G. Reduce Minimum Lot Size
- H. Increase Building Heights for Middle and Multi-family Housing
- I. Update Residential Zones
- J. Update Design Standards
- K. Inventory and Encourage Preservation of Naturally Occurring Affordable Housing
- L. Partner with Clackamas County and Seek Public/Private Partnerships
- M. Deferred System Development Charges (SDCs)
- N. System Development Charge (SDC) Waiver for Affordable Housing
- O. Construction Excise Tax (CET) Waiver

The descriptions of each action meet the requirements of OAR 660-008-0050(3)(a)

Each action listed under “*Strategies to Meet Future Housing Needs*” includes a section titled “Timeframes”. The heading “For Adoption” indicates when the city intends to formally adopt or commit to an action, satisfying OAR 660-008-0050(3)(b), while “Implement” reflects when each action is expected to become operational, satisfying OAR 660-008-0050(3)(c). The section also includes a heading titled “For Housing Impacts”, meeting OAR 660-008-0050(3)(d)(D).

Each action description includes a section titled “Estimated Magnitude of Impact”, which includes the heading “Housing Production Impact”. This describes the impact to production in very general terms which did not meet the requirements of OAR 660-008-0050(3)(d). The department reached out to the city during the review period to get a more detailed assessment of impact and were provided with the following table:

HPS Strategy	Estimated Magnitude of Impact	Adoption Year
A. Develop Process for Identifying Land to Up-Zone	High	2029
B. Allow Cottage Clusters in Residential Zones Complete in Fall 2024	Medium	2025
C. Identify Opportunities to Streamline Planned Unit Developments (PUDs)	Medium	2029
D. Incentives to Encourage Diverse Housing (via PUDs)	Medium	2029
E. Modify SDC Fee Schedules with Scale Based Charges Update Underway	Medium	2026
F. Land Use Permitting Education for Property Owners and Developers to help understand the permitting process and create an ADU guidebook	Medium	2029
G. Reduce Minimum Lot Size Part 1 completed in 2024	High	2029
H. Increase Building Heights (in R-2 zone and mixed-use zones)	Medium	2029
I. Update Residential Zones Update the code pursuant to State statute that requires mobile homes to be permitted uses in the R-1 and R-1.5 zones.	Medium	2026
J. Update Design Standards to consider alternative setbacks and design standards in construction	High	2029
K. Inventory and Encourage Preservation of Naturally Occurring Affordable Housing Focused on mobile home park preservation	Medium	2029
L. Partner with Clackamas County and Seek Public/Private Partnerships	Medium	2029
M. Deferred SDC Payments	Medium	2028
N. SDC Waiver for Affordable Housing	Medium	2029
O. Construction Excise Tax (CET) Fee Waiver for Affordable Housing	Medium	2029

This additional detail allows the department to confirm that the actions in the adopted HPS are responsive to the identified needs in the CHN. It will also help the city to assess whether the actions are successful in their intended impacts as the actions are implemented. With this submission, OAR 660-008-0050(3)(d) is met.

The “Estimated Magnitude of Impact” section also includes the headings “Housing Tenure Impact” and “Income Demographic Served”, identifying the housing need each action is intended to address, categorized by tenure and income. In many of the actions, however, “Income Demographic Served” identifies a broad range of incomes (i.e. “0-120% MFI”) rather than disaggregating into income categories. The CHN utilizes five income categories in describing the city’s population:

- Extremely Low (less than 30% of MFI)
- Very Low (30% to 50% of MFI)
- Low (50% to 80% of MFI)
- Middle (80% to 120% of MFI)
- Upper (120% or more of MFI)

Had the city described the impact of their actions in the same way, there would be a clearer connection between each action and the identified need. The department expects these income categories to be disaggregated in future HPS work. OAR 660-008-0050(3)(d)(A) is minimally met.

OAR 660-008-0050(3)(d)(C) requires an analysis of the income and demographic populations that are anticipated to receive benefit or burden for each action, including:

- (i) Low-income communities;
- (ii) Communities of color;
- (iii) People with disabilities; and
- (iv) Other state and federal protected classes

The “Estimated Magnitude of Impact” section includes the heading “Demographic Benefits and Burdens”, along with subheadings for “Low-income communities”, “Communities of color”, “People with disabilities”, “Individuals experiencing homelessness”, and “Seniors”. These descriptions generally do an exceptional job of describing the benefits and burdens, if any, which each action will have on the named populations. However, mitigation steps for identified burdens, where present, are not committed to, as intended by the rule. Actions A, B, C, D, G, H, I, J, M, N, and O identify displacement risks for one or more named populations without explicitly naming a mitigation action. For this reason, the department is applying the following condition of approval:

Condition of Approval #1: The city will submit a description of the actions or implementation steps which they will undertake to mitigate displacement risks where they have been identified. This may be by naming geographic criteria which will be used in applying actions, or through further targeting of actions to ensure that benefits are assisting those who are impacted by redevelopment. In some cases, the city has identified viable steps, but the language is non-committal. The department requests that the city provide this additional information within 90 days (by May 5, 2026) from the issuance of this HPS decision letter.

(4) Achieving Fair and Equitable Housing Outcomes – A Housing Production Strategy Report must include a narrative summarizing how the selected Housing Production

Strategies, in combination with other city actions, will achieve equitable outcomes with regard to the following factors:

(a) Location of Housing – How the city is striving to meet statewide greenhouse gas emission reduction goals, established under Executive Order No. 20-04, by creating compact, mixed-use neighborhoods available to people who are members of state and federal protected classes. Within Metro, cities subject to this rule shall describe actions taken by the city to promote the production of regulated affordable units, as defined in ORS 456.586(1)(b); to promote the production of accessible dwelling units; to mitigate or avoid the displacement of members of state and federal protected classes; and to remove barriers and increase housing choice for members of state and federal protected classes within Region 2040 centers.

The HPS includes a chapter titled “*Achieving Fair & Equitable Housing Outcomes*”, under which there is a section titled “Location of Housing”. The section lists the following nine actions which most directly support this rule:

- A. Develop Criteria & Process for Identifying Land to Up-zone
- B. Allow Cottage Clusters in Residential Zones
- E. Modify System Development Charge (SDC) Fee Schedules
- G. Reduce Lot Size
- H. Increase Building Heights
- J. Update Design Standards
- M. Deferred System Development Charges
- N. System Development Charge (SDC) Waiver for Affordable Housing
- O. Construction Excise Tax Allocation for Affordable Housing

OAR 660-008-0050(4)(a) is met.

(b) Fair Housing – How the city is affirmatively furthering fair housing for all state and federal protected classes. Affirmatively furthering fair housing means addressing disproportionate housing needs, patterns of integration and segregation, racially or ethnically concentrated areas of poverty, and disparities in access to housing opportunity.

The HPS combines its sections for actions which expand Fair Housing and Housing Choice. It lists fourteen actions as meeting these rule sections:

- A. Develop Criteria & Process for Identifying Land to Up-zone
- B. Allow Cottage Clusters in Residential Zones
- C. Identify Opportunities to Streamline PUDs
- D. Incentives to Encourage Diverse Housing Development in PUDs
- E. Modify System Development Charge (SDC) Fee Schedules
- F. Land Use Permitting Education for Property Owners and Developers

- G. Reduce Minimum Lot Size
- H. Increase Building Heights
- I. Update Residential Zones
- J. Update Design Standards
- K. Inventory and Encourage Preservation of Preserving Naturally Occurring Affordable Housing
- M. Deferred System Development Charges
- N. System Development Charge (SDC) Waiver for Affordable Housing
- O. Construction Excise Tax Allocation for Affordable Housing

While these actions may be applicable to both the Fair Housing and Housing Choice rule sections, the rules themselves are separate because they serve somewhat different functions. Actions which satisfy the Fair Housing rule take steps to identify and reduce housing disparities and patterns of segregation. Actions which meet the Housing Choice rule are those which ensure that housing which is affordable and accessible to protected classes in areas of opportunity. Taken collectively, the department agrees that OAR 660-008-0050(4)(b) is met. However, these rules should be addressed separately in future planning work.

(c) Housing Choice – How the city is facilitating access to housing choice for communities of color, low- income communities, people with disabilities, and other state and federal protected classes. Housing choice includes access to existing or new housing that is located in neighborhoods with high-quality community amenities, schooling, employment and business opportunities, and a healthy and safe environment.

As noted in the previous section, the HPS should have presented the actions related to Fair Housing and Housing Choice separately. However, the department finds that the fourteen actions listed in the combined section do satisfy OAR 660-008-0050(4)(c).

(d) Housing Options for People Experiencing Homelessness – How the city is advocating for and enabling the provision of housing options for residents experiencing homelessness and how the city is partnering with other organizations to promote services that are needed to create permanent supportive housing and other housing options for residents experiencing homelessness.

The section titled “Housing Options for People Experiencing Homelessness” notes that many of the actions in the adopted HPS will enhance housing stability and expand affordable housing options, including for people experiencing homelessness. It lists one action which directly impacts this population:

- L. Partner with Clackamas County and Seek Public/Private Partnerships

OAR 660-008-0050(4)(d) is met.

(e) Affordable Homeownership and Affordable Rental Housing – How the city is supporting and creating opportunities to encourage the production of affordable rental housing and the opportunity for wealth creation via homeownership, primarily for state and federal protected classes that have been disproportionately impacted by past housing policies.

The HPS lists all fifteen actions as having some beneficial impact on Affordable Homeownership and Affordable Rental Housing:

- A. Develop Criteria & Process for Identifying Land to Up-zone
- B. Allow Cottage Clusters in Residential Zones
- C. Identify Opportunities to Streamline PUDs
- D. Incentives to Encourage Diverse Housing Development in PUDs
- E. Modify System Development Charge (SDC) Fee Schedules
- F. Land Use Permitting Education for Property Owners and Developers
- G. Reduce Minimum Lot Size
- H. Increase Building Heights
- I. Update Residential Zones
- J. Update Design Standards
- K. Inventory and Encourage Preservation of Preserving Naturally Occurring Affordable Housing
- L. Partner with Clackamas County and Seek Public/Private Partnerships
- M. Deferred System Development Charges
- N. System Development Charge (SDC) Waiver for Affordable Housing
- O. Construction Excise Tax Allocation for Affordable Housing

It further describes the primary strategy to increase affordable rental opportunity through the development of higher density multi-unit properties in commercial zones, and the advancement of affordable homeownership by including income-restricted units in PUDs. This information meets the requirements of OAR 660-008-0050(4)(d).

(f) Gentrification, Displacement, and Housing Stability – How the city is increasing housing stability for residents and mitigating the impacts of gentrification, as well as the economic and physical displacement of existing residents resulting from investment or redevelopment.

The HPS lists eight actions which address housing stability:

- A. Develop Criteria & Process for Identifying Land to Up-zone
- B. Allow Cottage Clusters

- I. Update Residential Zones
- K. Inventory and Encourage Preservation of Preserving Naturally Occurring Affordable Housing
- L. Partner with Clackamas County and Seek Public/Private Partnerships
- M. Deferred System Development Charges
- N. System Development Charge (SDC) Waiver for Affordable Housing
- O. Construction Excise Tax Allocation for Affordable Housing

As previously noted, eleven actions identified a displacement risk for one or more populations without specifying a mechanism for mitigating that risk. When the city addresses Condition of Approval #1, however, OAR 660-008-0050(4)(e) will be met.

(5) A Housing Production Strategy Report must include the following additional elements:

(a) A description of any opportunities, constraints, or negative externalities associated with adoption of the elements of proposed Housing Production Strategies;

Each action in the chapter “*Strategies to Meet Future Housing Need*” includes a section titled “Revenue Impacts” which contains the information necessary to meet OAR 660-008-0050(5)(a).

(b) A description of actions that the city and other stakeholders must take to implement the proposed Housing Production Strategies;

Each action in the chapter “*Strategies to Meet Future Housing Need*” includes a section titled “Implementation Steps” which details the process by which the actions will be planned, adopted, implemented, and reviewed OAR 660-008-0050(5)(b) is met.

(c) If the Housing Production Strategy Report is the first produced under this division, a description of how the city will measure strategy implementation and progress;

In the HPS chapter titled “*Achieving Fair & Equitable Housing Outcomes*”, the city includes a section titled “*Measuring Strategy Implementation and Progress*” which describes how the city will metrics which will be used to analyze the impact of the actions at the time of the Midpoint Report. This information satisfies the requirements of OAR 660-008-0050(5)(c).

In addition to the Midpoint Report, the city will be producing annual monitoring summaries. The department is interested in the annual summaries for informational and educational purposes. As such, the department is applying the following condition of approval:

Condition of Approval #2: The department requests that, at the time the city submits its four-year Midpoint Report (by December 31, 2029) to the department under OAR 660-008-0230, the city provides all annual monitoring summaries thus far to the department. These annual summaries are not required as part of the submittal under OAR 660-008-0230 and will not be used to make any final approval decisions. Rather, they will help the department better understand local implementation trends and support broader learning across cities.

(d) If the Housing Production Strategy Report is not the first produced under this section, a summary of strategies that the city has previously adopted and implemented, and a reflection on the efficacy of each implemented strategy; and

Not applicable.

(e) A copy of the city's most recently completed survey to meet the requirements of ORS 456.586.

The HPS did not include the city's most recently completed pre-HPS survey. However, the CHN section titled "Past Actions by the City to Meet Housing Needs" includes this information. A pre-HPS survey which was compliant with ORS 456.586 was previously submitted to the department. OAR 660-008-0050(5)(e) is met.

The department truly appreciates the dedication and hard work the city has invested in the development of the HPS. Our commendations go out to the city for their ongoing commitment to ensuring fair and equitable housing options and outcomes. We are eager to continue our partnership with Canby as we work together toward this shared goal. Please reach out to the DLCD Housing Division at housing.dlcd@dlcd.oregon.gov to discuss this decision further, if desired.

Sincerely,

A handwritten signature in black ink, appearing to read "Ethan Stuckmayer". The signature is fluid and cursive, with a long horizontal stroke at the end.

Ethan Stuckmayer

Housing Division Manager, Department of Land Conservation and Development

Cc: Brenda Bateman, DLCD

Kirstin Greene, DLCD

Kelly Reid, DLCD

Ingrid Caudel, DLCD