CITY COUNCIL PUBLIC FORUM

Wednesday, May 01, 2019

265 Strand Street, St. Helens, OR 97051

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Welcome!

All persons planning to address the Council, please sign-in at the back of the room. When invited to provide comment regarding items not on tonight's agenda, please raise your hand to be recognized, walk to the podium in the front of the room to the right, and state your name only. You are not required to give your address when speaking to the City Council. If you wish to address a specific item on the agenda, you should make your request known to the Mayor as soon as possible before the item comes up. The Council has the authority to grant or deny your request. Agenda times and order of items are estimated and are subject to change without notice.

1. **6:00PM - Open Public Forum**

2. **Topic - Housing Needs Analysis**

   2.A. Housing Needs Analysis

   St Helens HNA Summary Report draft v01.pdf

   St Helens HNA Tech Appendix draft v1.pdf

3. **Close Public Forum**

The St. Helens City Council Chambers are handicapped accessible. If you wish to participate or attend the meeting and need special accommodation, please contact City Hall at 503-397-6272 in advance of the meeting.

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For more information or for an application, stop by City Hall or call 503-366-8217.

City of St. Helens

Housing Needs Analysis
Volume 1: Summary Report

DRAFT

April 24, 2019

ACKNOWLEDGEMENTS

This work is made possible through the sincere input by City staff and the St. Helens Planning Commission which served as the Housing Needs Analysis advisory committee, as well as community members that participated in the planning process. We recognize and appreciate the time and attention dedicated to this work by the following people.

St. Helens Mayor and City Council

Rick Scholl, Mayor

Doug Morten, Council President

Keith Locke, City Councilor

Stephen Topaz, City Councilor

Ginny Carlson, City Councilor

St. Helens Planning Commission (Housing Needs Analysis Advisory Committee)

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Section I. INTRODUCTION

St. Helens has evolved over the past 185 years from a rustic river trading post in 1834 to a full service city and Columbia County seat with over 13,240 residents. The city's name sake is attributed to both the iconic mountain that arises in the northeast and St. Helens, England, the birthplace of Captain H.M. Knighton, who first platted the town around 1847.

Like many Northwest communities, St. Helens is experiencing growth from natural increases in population as well as in-migration from other states. According to the U.S. Census Bureau, population in the Western U.S. is projected to grow at an average annual rate of 1.6%, compared to 1.0% nationally over the next 20 years.

The City of St. Helens (City) is in the process of updating the Housing Element of its Comprehensive Land Use Plan. FCS GROUP in conjunction with the Oregon Department of Land Conservation and Development (DLCD) provided technical assistance to the City by preparing products that comprise an up-to-date Housing Needs Analysis (HNA) for the City.

Major HNA technical work products include the following:

- A housing needs forecast for the St. Helens Urban Growth Boundary (UGB)
- A buildable land inventory (BLI) for residential and mixed-use designations in the UGB
- A residential land needs analysis for accommodating a 20-year housing demand forecast
- Identification of local policy measures for accommodating needed housing

All findings are also intended to comply with State of Oregon requirements for determining housing needs per Oregon land use planning Goals 10 and 14, OAR Chapter 660, Division 8, and applicable provision of ORS 197.295 to 197.314 and 197.475 to 197.490. ORS 197.303 was recently amended by passage of SB 1051 in 2017.

Funding for this project was provided to the City of St. Helens as a part of statewide legislation (SB 1051) aimed at addressing housing affordability issues throughout Oregon. Namely, the issue of "severely rent burdened" households (those which spend more than 50% of income on rent and utilities), a condition which over 25% of households in St. Helens are currently facing.

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Volume 1 of the St. Helens Housing Needs Analysis provides a summary of key findings and policy recommendations. Please refer to Volume 2: Technical Appendix, for additional detail regarding technical findings and the record of public input received during the HNA planning process.

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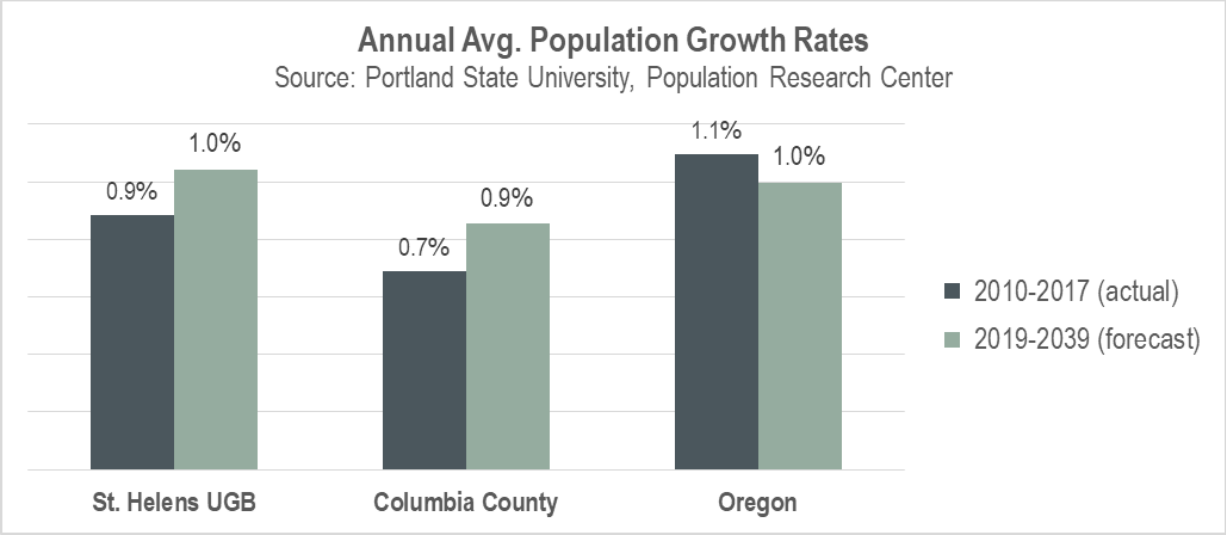
Section II. TRENDS AND FORECASTS

St. Helens (City) has experienced steady growth for the past few decades. Population in the City increased by 32%, from 10,019 residents in 2000 to 13,240 in 2017.

The population growth forecast for the St. Helens UGB (prepared by Portland State University, Population Research Center), anticipates steady growth over the next 20 years. Population within the St. Helens UGB is projected to grow from an estimated 15,693 people in 2019 to 19,310 by year 2039 (1.0% average annual growth rate). As population increases, the demand for all types of housing will increase.



St. Helens currently has a fairly large number of family households, which is evidenced by that fact that there were 2.49 people per housing unit in 2017, well above the County and State average.

Average Number of People per Unit, St. Helens, Columbia County, Oregon, 2017
Source: U.S. Census Bureau, 2013-2017 American Community Survey, compiled by FCS Group

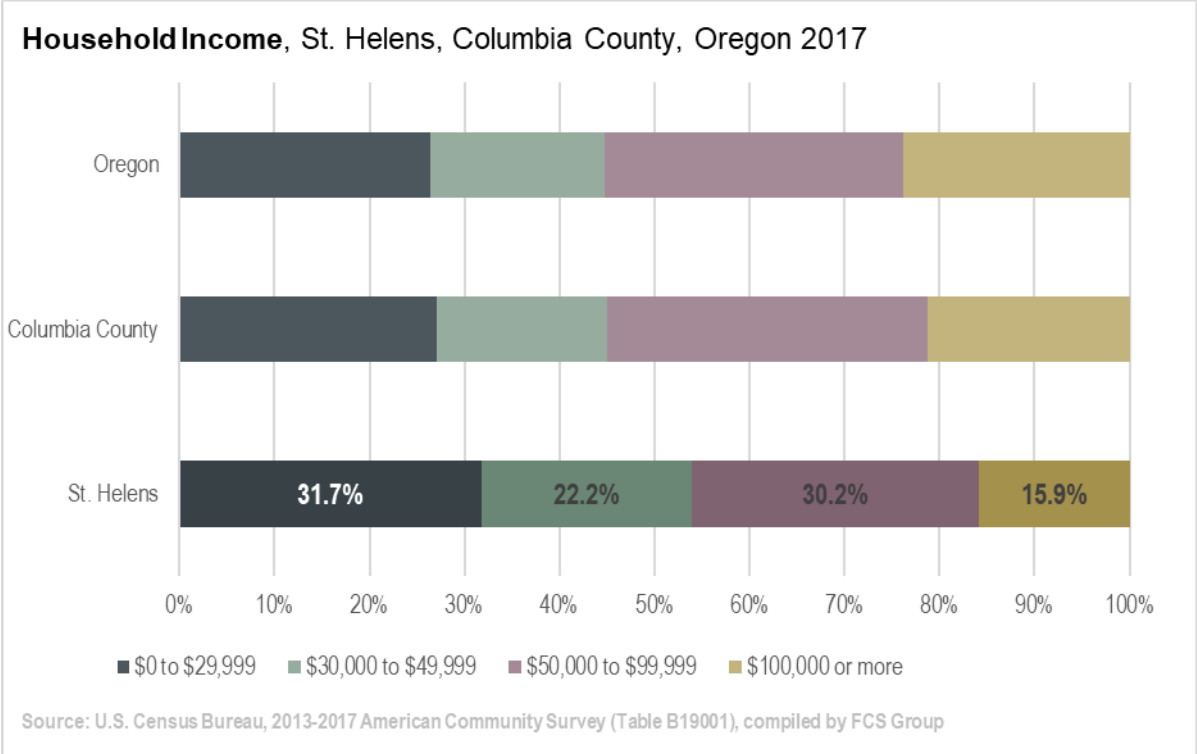
2.49	2.39	2.32
St. Helens	Columbia County	Oregon

St. Helens has a relatively high proportion of younger residents (under age 19) and a relatively lower share of older residents (over age 65) than Columbia County or the State of Oregon. The median age of local residents was 38.5 in 2017, measurably less than the County and State average.

Median Age, St. Helens, Columbia County, Oregon, 2017
Source: U.S. Census Bureau, 2013-2017 American Community Survey, compiled by FCS Group

38.5	43.3	39.2
St. Helens	Columbia County	Oregon

The median household income level in St. Helens ($45,789) is below Columbia County ($57,499) and Oregon ($56,119). As shown below, in comparison with Columbia County and the state average, St. Helens has a relatively higher share of low income residents earning less than $30,000 per year, and a relatively lower share of middle- and upper- income residents earning more than $50,000.



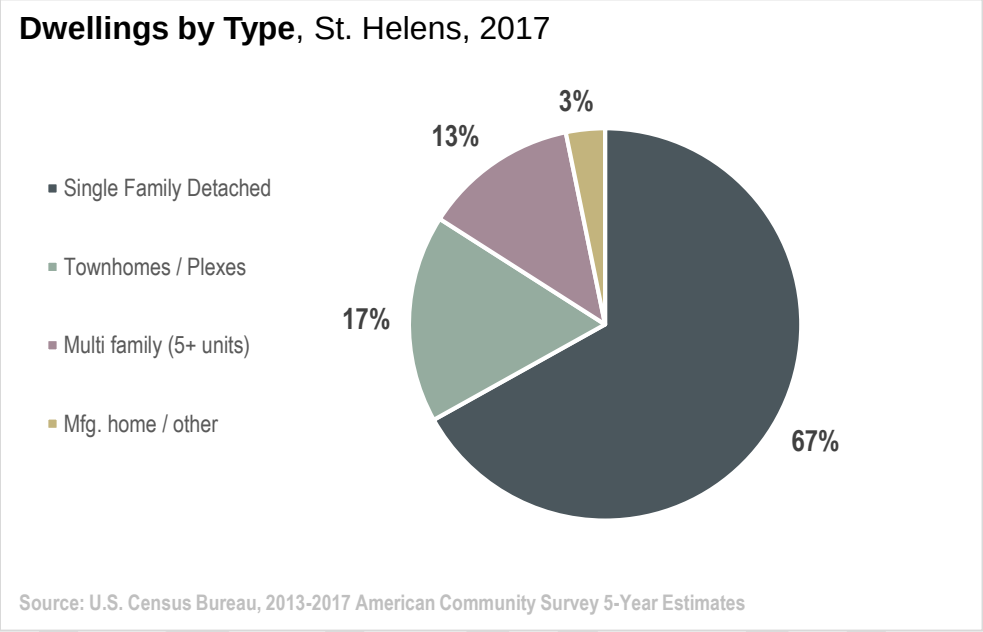
Source: U.S. Census Bureau, 2013-2017 American Community Survey (Table B19001), compiled by FCS Group

II.A. EXISTING HOUSING CHARACTERISTICS

An analysis of historical development trends and local housing market dynamics provides insight regarding how the housing market functions.

Housing Inventory

The existing housing stock in St. Helens is dominated by single family detached (classified as low density development) which accounts for over two-thirds of the inventory. The townhomes/plexes category, which includes housing with 2 to 4 dwellings per structure (medium density development) accounts for 17% of the existing housing inventory. Multifamily apartments and condos (with more than 5 units per structure) make up 13% of the inventory, and mobile homes/other housing types comprise the remainder.

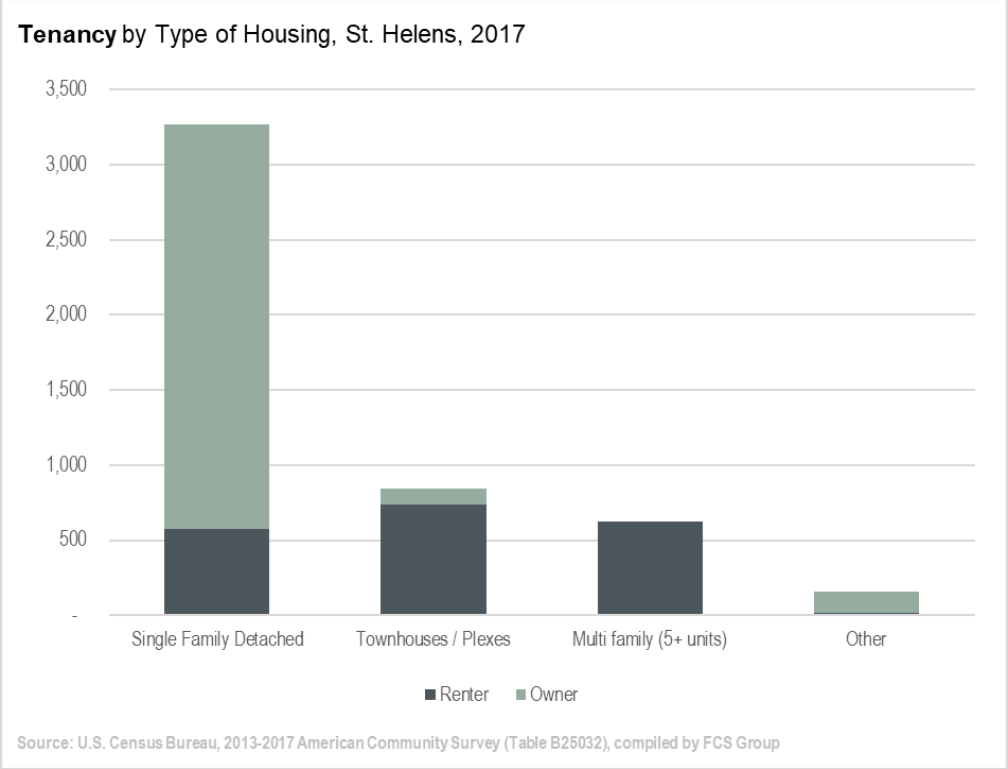


Housing Occupancy and Tenancy

The vast majority of home owners reside in single family detached homes or mobile homes (aka. manufactured housing) and most renters reside in townhomes/plexes and multifamily units.

According to the U.S. Census, American Community Survey, the overall housing vacancy rate in St. Helens was about 8 percent overall. Over half of the vacant inventory reflects single family dwellings that were recently sold or listed for sale.

Vacancy rates for rental housing in St. Helens was 1.5% in 2017. Housing advocacy groups reported a 6 to 12 month wait list for government assisted housing units.



Construction Permitting Activity

During the past several years, new housing in St. Helens has been comprised primarily of single family detached housing construction. The City issued 25-42 new construction permits annually since 2008, down significantly from pre-recession peak activity of 88+ new building permits in 2006-2007.

Over the past 12 months, there has been a significant uptick in local housing construction activity, with much more developer interest in building multifamily apartments and mixed-use developments. Presently, nearly 500 units have been approved in St. Helens which are expected to build out soon. The developments will include single family detached housing built in subdivisions as well as a significant number of apartments.

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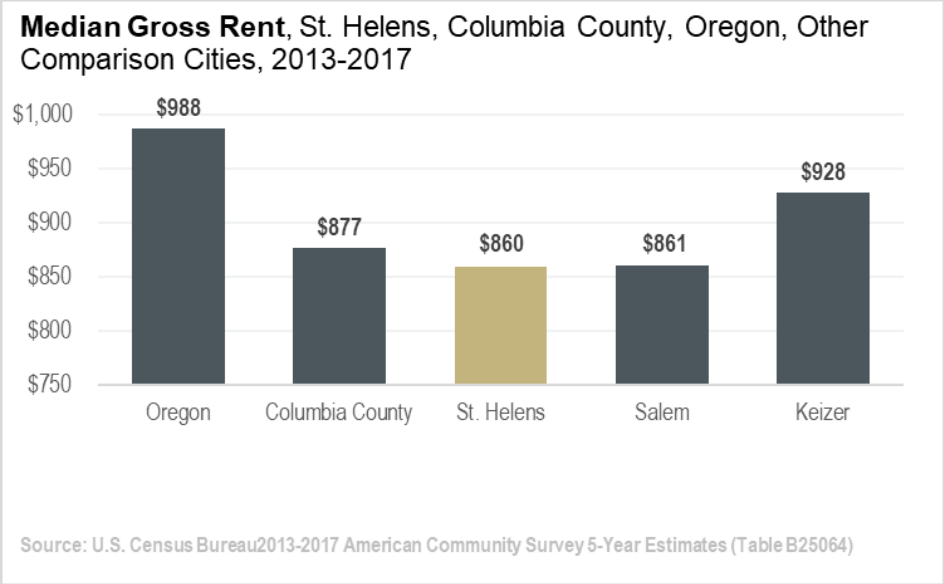
Housing Affordability

Like many communities, local income levels have not kept pace with housing prices and rent levels in recent years, thereby creating a housing affordability challenge. The median home price in St. Helens was approximately $272,500 (2019, 1st Q), below the average median home prices found in Columbia County and Oregon.

Median Home Price, St. Helens, Columbia County, Oregon, 2019
Source: Zillow, 2019

$272,500	$295,000	$346,100
St. Helens	Columbia County	Oregon

Rents in St. Helens were also slightly lower when compared with Columbia County as a whole. According to the U.S. Census, American Community Survey, the median gross rent in St. Helens was $860 per month in 2017, which was about 2 percent below the county average.



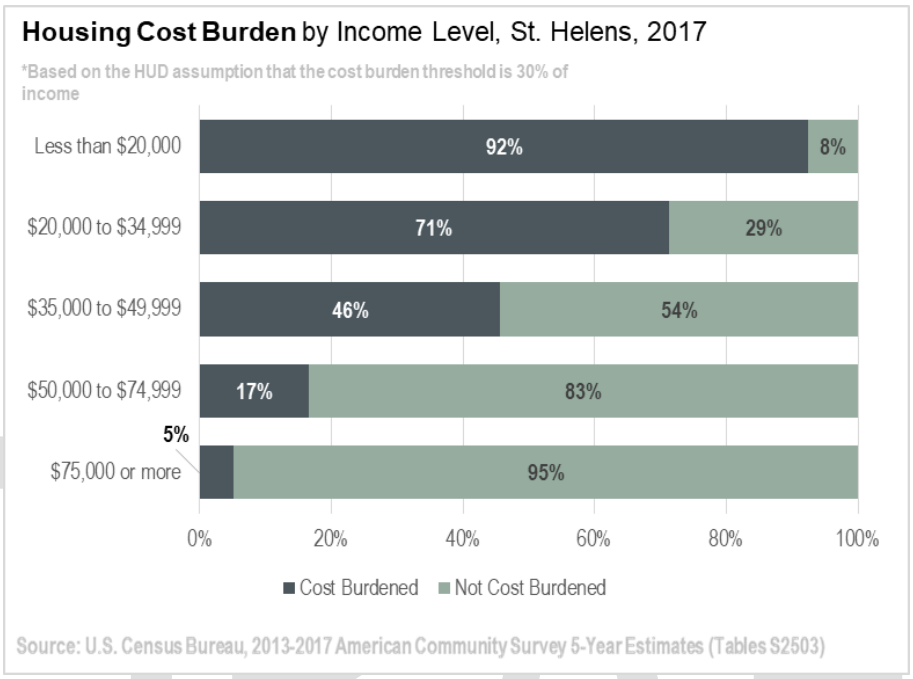
Housing Cost Burdens

According to U.S. Housing and Urban Development (HUD), households are considered to be "cost burdened" if they pay over 30% of their income on housing. Households are "severely cost burdened" when they pay over 50% of their income on housing.

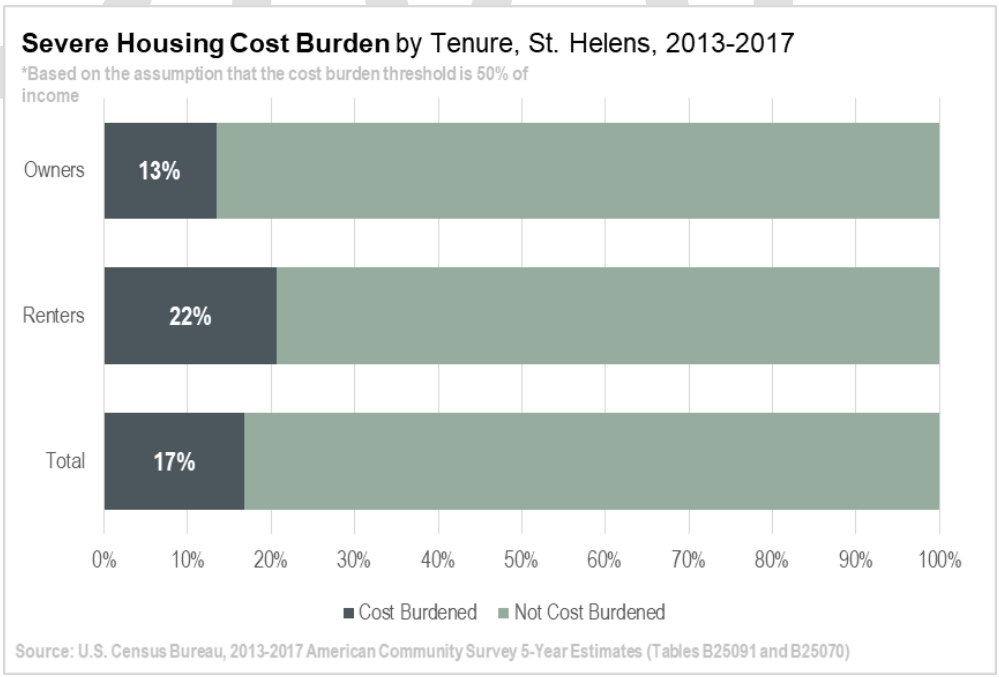
In 2017, about 13% of the households in St. Helens were considered to be cost burdened.

As shown below, households earning less than $20,000 are experiencing the greatest hardship with respect to housing cost burdens. Nearly 3 out of 4 households with income between $20,000 and

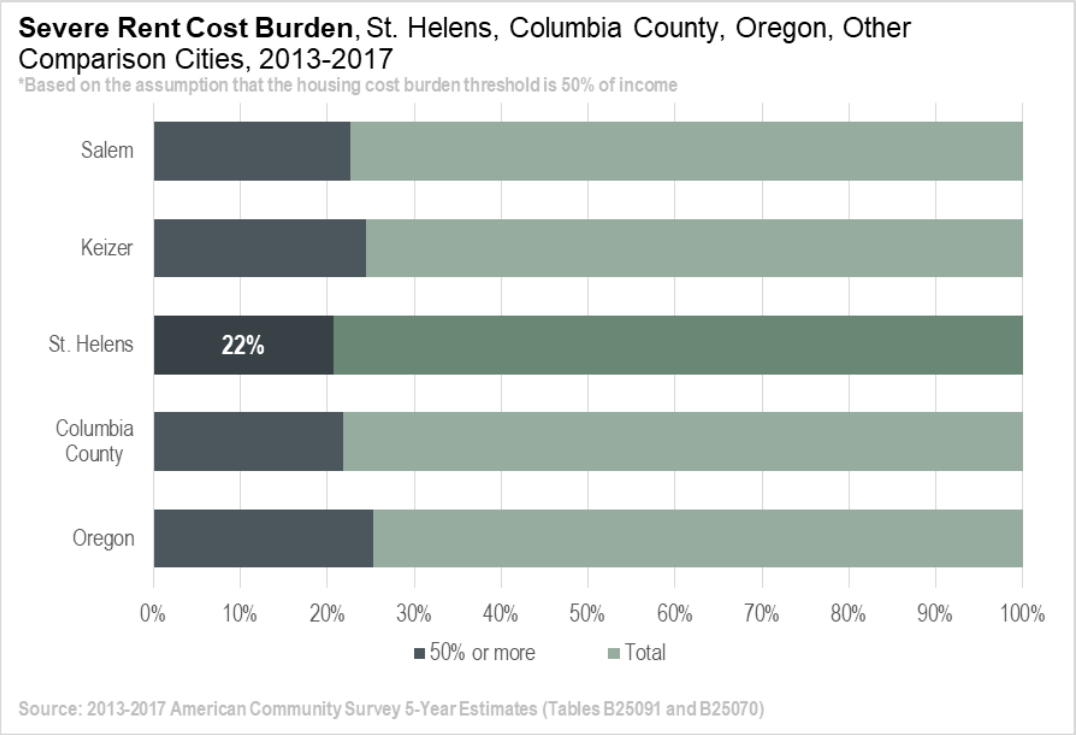
$35,000 are housing cost burdened. And nearly half of households with income between $35,000 and $50,000 are cost burdened.



An analysis of severe rent burdens in St. Helens indicates that 22% of the renters and 13% of the home owners are paying more than 50% of their income on housing costs.



The overall share of severely rent burdened households in St. Helens is about on par with the Columbia County and State average.



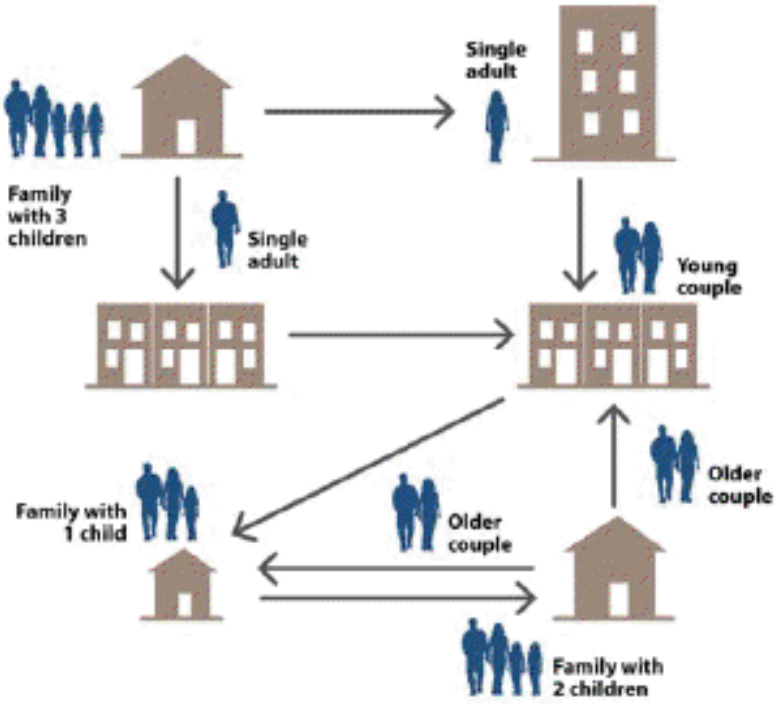
II.B. HOUSING NEEDS

Factors Affecting Housing Demand

There is a clear linkage between demographic characteristics and housing choice. As shown in the figure below, housing needs change over a person's lifetime. Other factors that influence housing include:

- Homeownership rates increase as income rises.
- Single family detached homes are the preferred housing choice as income rises.
- Renters are much more likely to choose multifamily housing options (such as apartments or plexes) than single-family housing.
- Very low income households (those earning less than 50% of the median family income) are most at-risk for becoming homeless if their economic situation worsens.

Housing Life Cycle



Key definitions:

"Households" consist of all people that occupy a housing unit.

"Family" is a group two or more people (one of whom is the householder) related by birth, marriage, or adoption and residing together.

The relationship between demographic changes and housing needs can be used to forecast future housing needs. Three main demographic changes affected housing in St. Helens includes:

Aging Millennials (born early 1980s to early 2000s)

Millennials accounted for 23% of the St. Helens residents in 2017 (age 20 to 39), and this share is expected to increase moderately over the next two decades. Younger millennials tend to rent as they establish their careers and many are saddled with student debt. Older working millennials are usually considered to be prospective first-time homebuyers, and often prefer to live in single family homes (detached homes or townhomes/plexes).

Aging Baby Boom generation (those born 1946 to 1964)

Baby boomers accounted for 21% of the St. Helens residents in 2017 (age 55 to 74), and this segment is now growing more slowly than the millennial and younger family segments. Boomers usually prefer to "age in place" until they exceed age 75, then may downsize or move in with family members (sometimes opting to reside in accessory dwellings off the main house). As they approach age 80 some desire to move into assisted living facilities with nearby health care services and transit access.

Families with Children

This category includes a subset of the baby boomers and millennials, and also includes householders between the age of 40 and 55. Taken as a whole, this category constitutes the majority of St. Helens population and is expected to increase moderately over the next two decades. Families prefer to live in a variety of single family housing options (detached homes or townhomes/plexes) at price points commensurate with their family income.

Future Housing Need Forecast

The future (20 year) housing need forecast for St. Helens takes into account these factors. As reflected in the findings contained in Volume 2, Section II of the housing needs analysis, based on the projected population growth and housing market conditions, St. Helens is expected to add 3,617 people and that will require 1,621 net new dwelling units over the next 20 years.

As indicated below, this net new housing need is expected to consist of: 861 owner-occupied dwellings and 760 renter-occupied dwellings. As shown below, the types of housing that is most suited to meet qualifying income levels for home ownership vary by family income level.

Family Income Level	Owner-Occupied	Renter-Occupied	Total Dwellings	Dist. %	Attainable Housing Products
Upper (120% or more of MFI)	278	35	313	19%	Standard Homes, Townhomes
Middle (80% to 120% of MFI)	127	44	171	11%	Small Homes, Townhomes, Apartments
Low (50% to 80% of MFI)	236	182	417	26%	Small Homes, Townhomes, Mfgd. Homes, Plexes, Apts.
Very Low (30% to 50% of MFI)	140	218	359	22%	ADUs, Govt. Assisted Apts.
Extremely Low (less than 30% of MFI)	80	281	361	22%	Govt. Assisted Apts.
Total	**861**	**760**	**1,621**	100%	

** Source: based on projected housing need and 2017 ACS household income and tenancy data for City of St. Helens.*

The housing mix that addresses future demand will likely consist of: 959 single-family detached homes, 245 townhomes/duplexes, 333 multifamily housing units and 46 manufactured housing units. There will also be some "group quarters" housing demand for about 37 people that require shared living arrangements (such as congregate care or group housing).

20-year Dwelling Unit Demand, St. Helens UGB

Housing Type	Owner-Occupied Dwelling Units	Renter-Occupied Dwelling Units	Total	Dist. %
Single Family Detached	790	169	959	59%
Townhomes / Plexes	29	216	245	15%
Multi family (5+ units)	0	333	333	21%
Mfg. home / other	42	4	46	3%
Group Quarters	0	37	37	2%
Total Units	**861**	**760**	**1,621**	**100%**

Source: derived from St. Helens HNA, Housing Needs Analysis, Task 2 findings, April, 2019.

The owner-occupied housing forecast that's suited to meet qualifying income levels is shown below.

St. Helens Owner-Occupied Housing Needs: 2019-2039

Family Income Level	Upper Range of Qualifying Income	Upper Range of Home Price*	Housing Types	Estimated Distribution of Owner-Occupied Units	Projected Owner-Occupied Units Needed
Upper (120% or more of MFI)	Greater than $89,640	Greater than $469,000	Standard Homes	32%	278
Middle (80% to 120% of MFI)	$89,640	$469,000	Small and Standard Homes, Townhomes	15%	127
Low (50% to 80% of MFI)	$59,760	$313,000	Small Homes, Townhomes, Mfgd. Homes, Plexes	27%	236
Very Low (30% to 50% of MFI)	$37,350	$195,000	ADUs, Govt. Assisted	16%	140
Extremely Low (less than 30% of MFI)			Govt. Assisted	9%	80
Total				**100%**	**861**

**Assumes 30% of income is used for mortgage payment, 20% downpayment, 5.5% interest, 30-year mortgage.*

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The rental housing forecast that's consistent with qualifying income levels is shown below.

Aprirational Home Types and Price Points to Meet Attainability Goals*
St. Helens Rental-Occupied Housing Needs: 2019-2039

Family Income Level	Upper Range of Qualifying Income	Upper Range of Monthly Rent*	Attainable Housing Products	Estimated Distribution of Units	Projected Renter-Occupied Units Needed
Upper (120% or more of MFI)	Greater than $89,640	Greater than $2,079	Standard Homes, Townhomes	5%	35
Middle (80% to 120% of MFI)	$89,640	$2,241	Small Homes, Townhomes, Apartments	6%	44
Low (50% to 80% of MFI)	$59,760	$1,494	Small Homes, Townhomes, Mfgd. Homes, Plexes, Apts.	24%	182
Very Low (30% to 50% of MFI)	$37,350	$934	ADUs, Govt. Assisted Apts.	29%	218
Extremely Low (less than 30% of MFI)			Govt. Assisted Apts.	37%	281
Total				**100%**	**760**

**Assumes 30% of income is used for rental payments.*

Currently the fair market rents within Columbia County range from $1,131 for an efficiency unit to $2,531 for a four-bedroom unit.

Implications for St. Helens

As mentioned previously, the city of St. Helens has been issuing about 30 to 50 new housing construction permits annually over the past several years, and there are now nearly 460 units of private housing and 17 units of government assisted housing pending. Private developers and builders will likely continue to meet the majority of housing market demand for both owners and renters, particularly for households earning over 60-80% of the median family income (some developments will require subsidies for the provision of a percentage of units restricted to low income households).

To address the housing need associated with very low and extremely low income levels (less than 60% of the MFI), there will be increased pressure on non-profit developers to deliver "deed restricted" government subsidized housing units and mixed-income developments.

Local land use policies and other affordable housing recommendations that are intended to help address affordable housing needs are identified in Section 4.

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Section III. LAND NEEDS

III.A. RESIDENTIAL BUILDABLE LAND INVENTORY

At the beginning of 2019, the St. Helens UGB had a residential buildable land inventory (BLI) of 705.4 acres. As shown below, the majority of the buildable land inventory included 577.2 acres of low-density designated land. There was also 93.5 acres of medium-density land, and 15.5 acres of high-density land. The BLI for commercial and mixed-use land area includes 19.2 acres (126.9 acres of vacant land plus 0.9 acres of redevelopment land multiplied by the 15% housing conversion factor).

Land Classification	Vacant & Part Vacant	Redevelopable Land	Housing Development Factor*	Total Buildable Residential Land
Low Density	569.7	7.5	100%	577.2
Medium Density	92.7	0.8	100%	93.5
High Density	14.9	0.7	100%	15.5
Commercial and Mixed Use	126.9	0.9	15%	19.2
Grand Total	**804.1**	**9.9**	**-**	**705.4**

Source: derived from prior tables using City of St. Helens GIS data.
*Assumes a 15% housing redevelopment rate.

Definitions

Buildable Residential Land: includes land that is designated for residential development that is vacant and part-vacant and not constrained by existing buildings or environmental issues.

Vacant land: vacant and part-vacant land that is unconstrained and suitable for designated residential development.

Part-vacant land: unconstrained land that has some existing development, but can be subdivided to allow for additional residential development.

Constrained land: land that is unavailable for future net new residential development based on one or more factors, such as environmental protections, public lands, floodplains, or steep slopes.

Development density: expected number of dwelling units (per acre) based on current zoning designations.

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Relative Housing Density	Housing Types	Local Zoning Classifications	Expected Avg. Density (DU per acre)
Low Density 	Single family detached	R10, R-7	4
Medium Density 	Small lot single family, townhomes, plexes, cottages	R-5	8
High Density 	Apartments, condos	AR (apartment residential)	14
Manufactured Home Park 	Manufactured homes, mobile homes	MHR (mobile home residential)	10
Commercial and Mixed Use	Apartments or condos with commercial	Mixed Use (MU), Riverfront Dist. (RD), Houlton Business Dist. , General Commercial (GC), Highway Commercial (HC)	14

III.B. RESIDENTIAL LAND DEMAND

As shown in the following table, the forecasted housing need (1,621 units) is expected to require 309 acres of buildable land area. Since the current UGB includes 705 acres, there is an overall residential land surplus of 397 acres at this time

The BLI findings indicate that the existing amount of vacant and redevelopable land within the St. Helens UGB is generally sufficient to accommodate planned 20-year housing needs.

However, when you consider land needs for high density housing (primarily apartments) there is a slightly greater land need than the existing supply of high-density designated land by 8 acres.

Dwellings/Units	
Low Density*	959
Medium Density**	283
High Density	333
Manufactured Dwelling Units	46
Total	**1,621**
Land Need (net acres)	
Low Density*	240
Medium Density**	40
High Density	24
Manufactured Home Parks	5
Total	**309**
Buildable Land Inventory (net acres)	
Low Density	532
Medium Density	93
High Density	16
Manufactured Home Parks	45
Commercial/Mixed Use	19
Total	**705**
UGB Land Surplus/Deficit (net acres)	
Low Density*	293
Medium Density**	53
High Density	(8)
Manufactured Home Parks	40
Commercial/Mixed Use	19
Total	**397**
Adequacy of UGB to meet housing need	adequate

* Includes detached units and mobile homes. ** Includes townhomes, plexes and group quarters.

While the overall UGB land supply is adequate to meet future demand, there is currently a need to utilize commercial/mixed use sites for specific amounts of high density (apartment) development. These and other policy recommendations are described in Section 4.

The following maps illustrate the location of buildable vacant and partially vacant buildable land areas for the residential and commercial/mixed-use land base within the St. Helens UGB.

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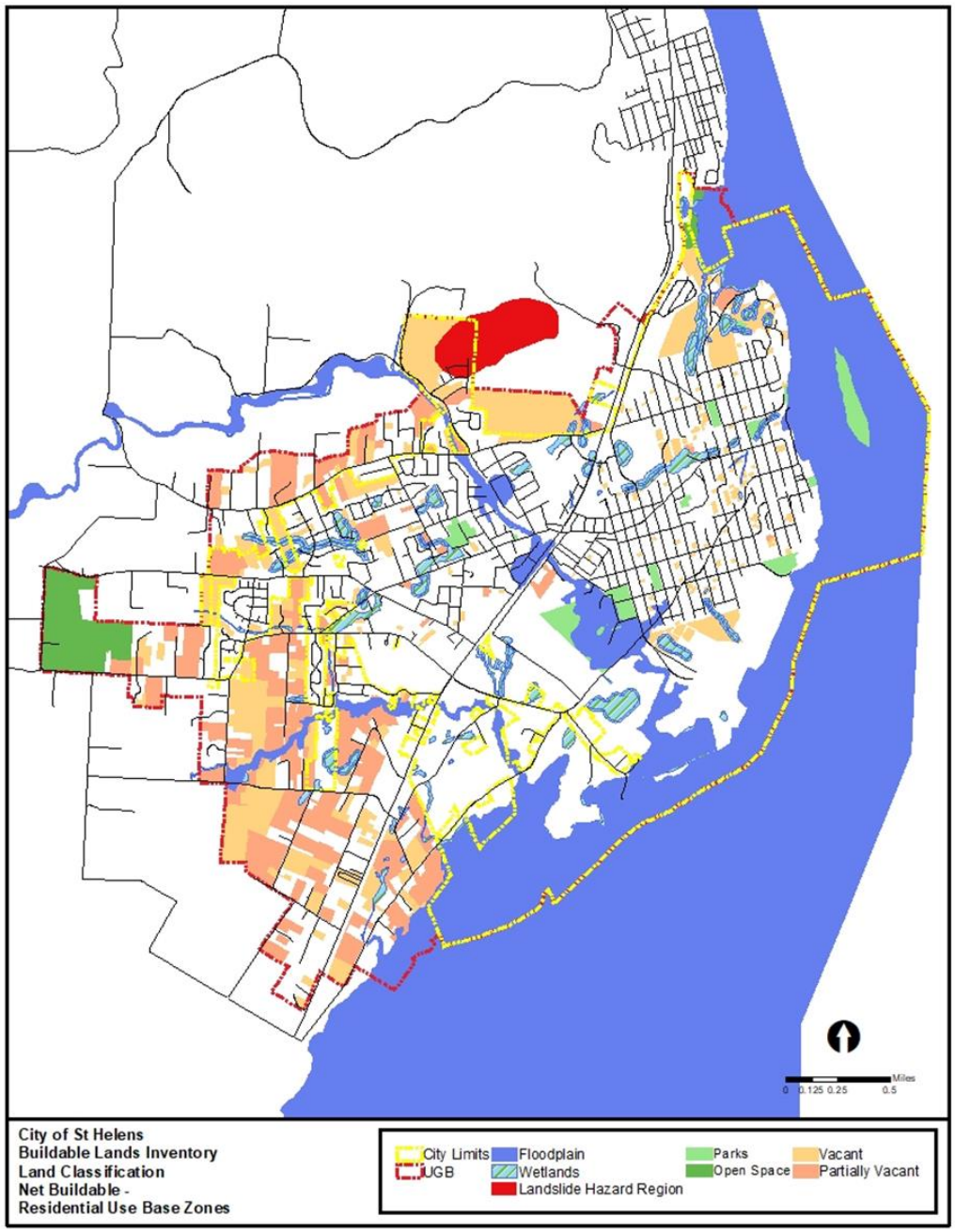
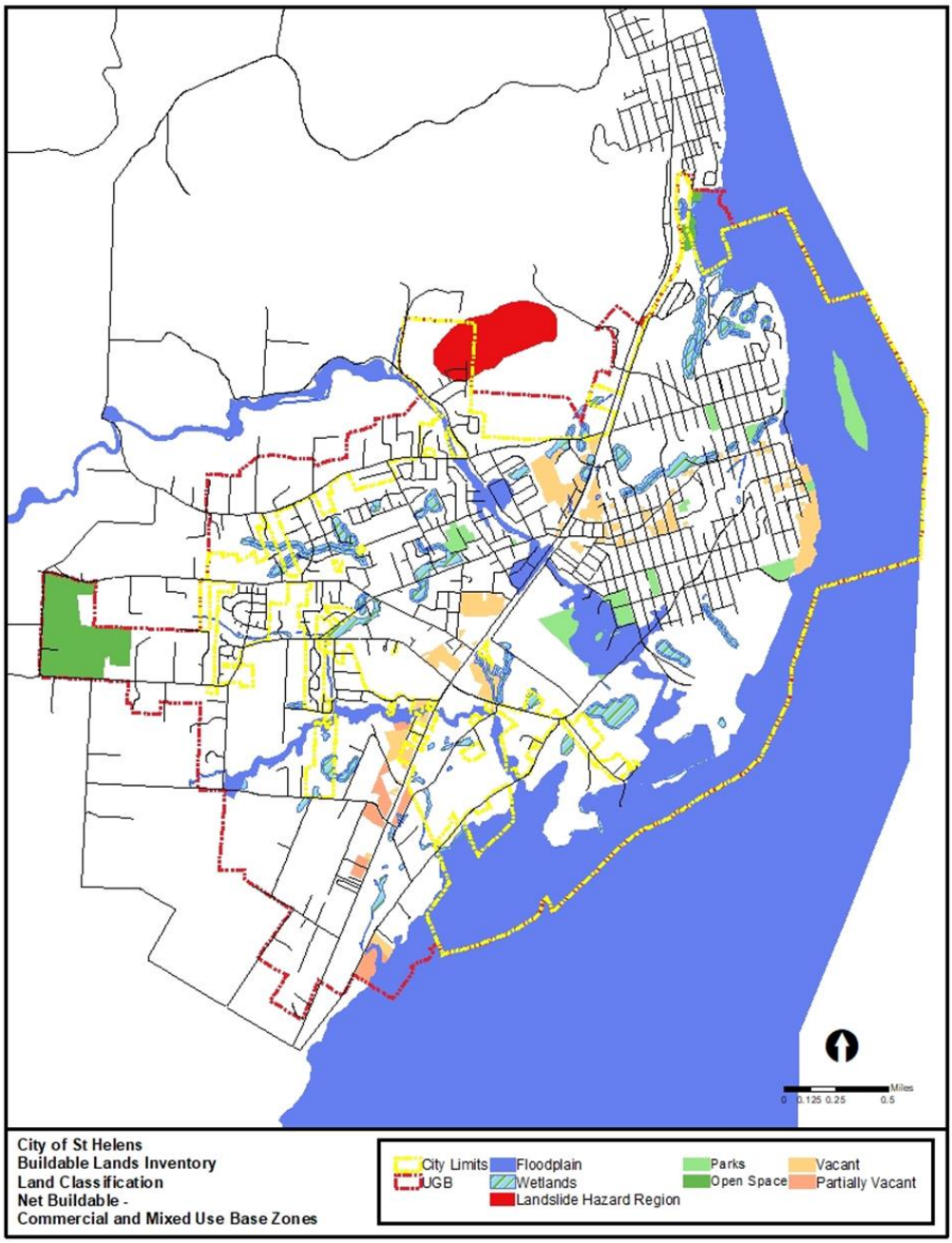
Residential Land Base with all constraints, St. Helens UGB, 2019



Commercial & Mixed-Use Land Base with all constraints, St. Helens UGB, 2019



Section IV. Housing Policy Strategies

OVERALL FINDINGS

As mentioned previously, St. Helens population growth over the next 20 years will result in new households that will require additional housing and residential land.

Key findings of the housing needs analysis are:

- St. Helens population is forecast to grow at 1% per year over the next two decades, adding more than 3,600 new residents. About 53% will be owners and 47% will be renters.
- Population growth will require the addition of 1,621 new dwelling units between 2019 and 2039.
- Nearly 60% of the future housing need will consist of single family detached housing, 35% will be a mix of plexes, townhomes and apartments; and 5% will be comprised of manufactured housing and other housing types.
- The share of low-income households in St. Helens (those making 80% or less of the median family income level for Columbia County) is represented by nearly 7 in 10 households.
- Over 2 in 10 renter households are severely rent burdened with over 50% of their income going towards monthly housing costs.
- St. Helens has an existing deficit of affordable housing, as well as market-rate rental apartments.

The results of the housing needs analysis indicates that while the current UGB is sufficient to accommodate future housing needs. However, in light of the limited supply of high-density land for multifamily, it is likely that the land needed for apartments will exceed the vacant buildable high density land supply for that category.

HOUSING POLICY RECOMMENDATIONS

The City of St. Helens Comprehensive Plan already has a number of housing goals, objectives and policies that complies with Oregon Planning Goal 10 Housing (see excerpts provided in **Appendix A**).

As part of this HNA update the following strategies and recommendations have been identified to supplement the current housing goals and policies.

Recommendations

Recommended policies include allowing cottage cluster development annual tracking of the housing inventory in St. Helens. Other policies being considered will be presented to City Council and will be finalized in the conclusion of the HNA process.

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APPENDIX A: EXISTING HOUSING GOALS AND POLICIES

The following housing policies and goals are excerpted from the City of St. Helens municipal code section 19.08.050.

Preface

Residents of the city of St. Helens are demographically in different stages of socioeconomics. As such, they vary in their family sizes, economic capabilities and interests and will desire different types of housing. The strategy is to ensure that sufficient lands are designated for those different phases and desires of current and future residents and to encourage policies and decisions to allow all residents the ability to find affordable housing.

Housing Goals

1. To promote safe, adequate, and affordable housing for all current and future members of the community.
2. To locate housing so that it is fully integrated with land use, transportation and public facilities as set forth in the Comprehensive Plan.

Housing Policies

1. Maintain adequate development and building codes to achieve the city's housing goals.
2. Encourage the distribution of low income and/or multifamily housing throughout the city rather than limiting them to a few large concentrations.
3. Work with all interested agencies to facilitate housing conservation and construction, and to improve substandard dwellings where cost effective.
4. Encourage and cooperate with all efforts to provide adequate housing for those with special needs.
5. Permit multifamily developments which conform to the following general conditions and criteria:

    - They should not be constructed within areas which are established and recognized as substantially well maintained single-family areas.
    - They should have safe and appropriate arrangement of buildings, open spaces, and parking access.
    - They should not be so large or close to single-family homes as to block their view or sunlight or to unduly interfere with an established single-family character; where conditionally used, they thus shall be subject to density criteria.
    - They should include adequate open space.
    - They should include ample off-street parking.

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- They should not be located where undue noise or other factors will adversely affect residential living.
- They shall be subject to a site design review process and minimum landscaping requirements.

6. Permit mobile home park development which conforms to the following general conditions and criteria:

- They should not be constructed within areas which are established and recognized as substantially well maintained single-family areas.
- They should include adequate open space.
- They should include ample off-street parking.
- They should not be located where undue noise or other factors will not adversely affect residential living.
- They shall be subject to a site design review process and minimum landscaping requirements and possibly fencing or screening requirements.
- They should provide internal vehicular and pedestrian circulation and landscaping.
- Re-evaluate city ordinances and, where possible, streamline administration and requirements in order to reduce development costs.
- Encourage energy-efficient housing patterns in residential developments. (Ord. 2980 § 2, 2006)

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GLOSSARY OF TERMS

Accessory Dwelling Unit (ADU): A small living space located on the same lot as a single-family house.

Buildable Lands Inventory (BLI): An assessment of the capacity of land within the city's Urban Growth Boundary to accommodate forecasted housing and employment needs.

Buildable Residential Land: Includes land that is designated for residential development that is vacant and part-vacant and not constrained by existing buildings or environmental issues.

Constrained land: Land that is unavailable for future net new residential development based on one or more factors, such as environmental protections, public lands, floodplains, or steep slopes.

Cost Burdened: Defined by US Department of Housing and Urban Development (HUD) as households who spend over 30% of their income on housing.

Cottages: Small, single-level, detached units, often on their own lots and sometimes clustered around pockets of shared open space. A cottage is typically under 1,000 square feet in footprint.

Density: Defined by the number of housing units on one acre of land.

Development density: Expected number of dwelling units (per acre) based on current zoning designations.

Family: A group two or more people (one of whom is the householder) related by birth, marriage, or adoption and residing together.

High Density: Lots with the average density of 12+ dwelling units per acre. Best suited for multifamily housing such as apartments and condos.

Housing Needs Analysis (HNA): The Housing Needs Analysis consists of four distinct reports that analyze the state of housing supply, housing affordability issues and the City's ability to meet projected housing demand going into 2040.

Housing Unit (or Dwelling Unit): A house, an apartment or other group of rooms, or a single room is regarded as a housing unit when it is occupied or intended for occupancy as separate living quarters; that is, when the occupants do not live and eat with any other person in the structure and there is direct access from the outside or common hall.

Household: Consists of all people that occupy a housing unit.

HUD: Acronym for US Department of Housing and Urban Development, the federal agency dedicated to strengthening and supporting the housing market.

Low Density: Lots with the average density of 3-4 dwelling units per acre. Best suited for family housing such as single family detached homes.

Manufactured Housing: is a type of prefabricated home that is largely assembled of site and then transported to sites of use. The definition of the term in the United States is regulated by federal law (Code of Federal Regulations, 24 CFR 3280): "Manufactured homes are built as dwelling units of at

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least 320 square feet in size, usually with a permanent chassis to assure the initial and continued transportability of the home. The requirement to have a wheeled chassis permanently attached differentiates "manufactured housing" from other types of prefabricated homes, such as modular homes.

Manufactured Home Park (or manufactured home park): a local zoning designation that is specifically intended to address demand for this housing type. OAR chapter 813, division 007 is adopted to implement section 9, chapter 816, Oregon Laws 2009, and sections 2, 3 and 4, chapter 619, Oregon Laws 2005, as amended by sections 10 to 12, chapter 816, Oregon Laws 2009, and sections 19, and 21, chapter 503, Oregon Laws 2011 for the purpose of regulating manufactured dwelling parks.

Median Family Income (MFI): The median sum of the income of all family members 15 years and older living in the household. Families are groups of two or more people (one of whom is the householder) related by birth, marriage, or adoption and residing together; all such people (including related subfamily members) are considered as members of one family.

Medium Density: Lots with the average density of 6-12 dwelling units per acre. Best suited for small lot housing such as single family attached, townhomes, plexes and cottages.

Mixed Use: Characterized as two or more residential, commercial, cultural, institutional, and/or industrial uses into one combined building or building(s) on the same parcel of land.

Multi-Family Housing: Stacked flats in a single buildings or groups of buildings on a single lot. Parking is shared, and entrance to units is typically accessed through a shared lobby.

Oregon Administrative Rules (OAR): Administrative Rules are created by most agencies and some boards and commissions to implement and interpret their statutory authority (ORS 183.310(9)). Agencies may adopt, amend, repeal or renumber rules, permanently or temporarily. Every OAR uses the same numbering sequence of a three-digit chapter number followed by a three-digit division number and a four-digit rule number. For example, Oregon Administrative Rules, chapter 166, division 500, rule 0020 is cited as OAR 166-500-0020. (oregon.gov)

Part-vacant land: Unconstrained land that has some existing development, but can be subdivided to allow for additional residential development.

Plexes and Apartments: Multiple units inside one structure on a single lot. Usually each unit has its own entry.

Seasonal dwellings: These units are intended by the owner to be occupied during only certain seasons of the year. They are not anyone's usual residence. A seasonal unit may be used in more than one season; for example, for both summer and winter sports. Published counts of seasonal units also include housing units held for occupancy by migratory farm workers. While not currently intended for year-round use, most seasonal units could be used year-round.

Severely Cost Burdened: Defined US Department of Housing and Urban Development (HUD) as households who spend over 50% of their income on housing.

Single Family Attached: Dwelling units that are duplexes without a subdividing property line between the two to four housing units. "Attached" duplexes require a single building permit for both

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dwelling units. The "attached" units would be addressed with one numerical street address for the overall structure with separate alpha-numeric unit numbers for each dwelling.

Single Family Detached: Free standing residential building**,** unattached, containing separate bathing, kitchen, sanitary, and sleeping facilities designed to be occupied by not more than one family, not including manufactured and mobile homes.

Townhome (also known as duplexes, rowhouse, etc.): Attached housing units, each on a separate lot, and each with its own entry from a public or shared street or common area.

Urban Growth Boundary (UGB): Under Oregon law, each of the state's cities and metropolitan areas has created an urban growth boundary around its perimeter – a land use planning line to control urban expansion onto farm and forest lands.

Vacant housing unit: A housing unit is vacant if no one is living in it at the time of enumeration, unless its occupants are only temporarily absent. Units temporarily occupied at the time of enumeration entirely by people who have a usual residence elsewhere are also classified as vacant.

Vacant land: Vacant and part-vacant land identified within the local buildable land inventory that is not developed and unconstrained for future planned residential development.

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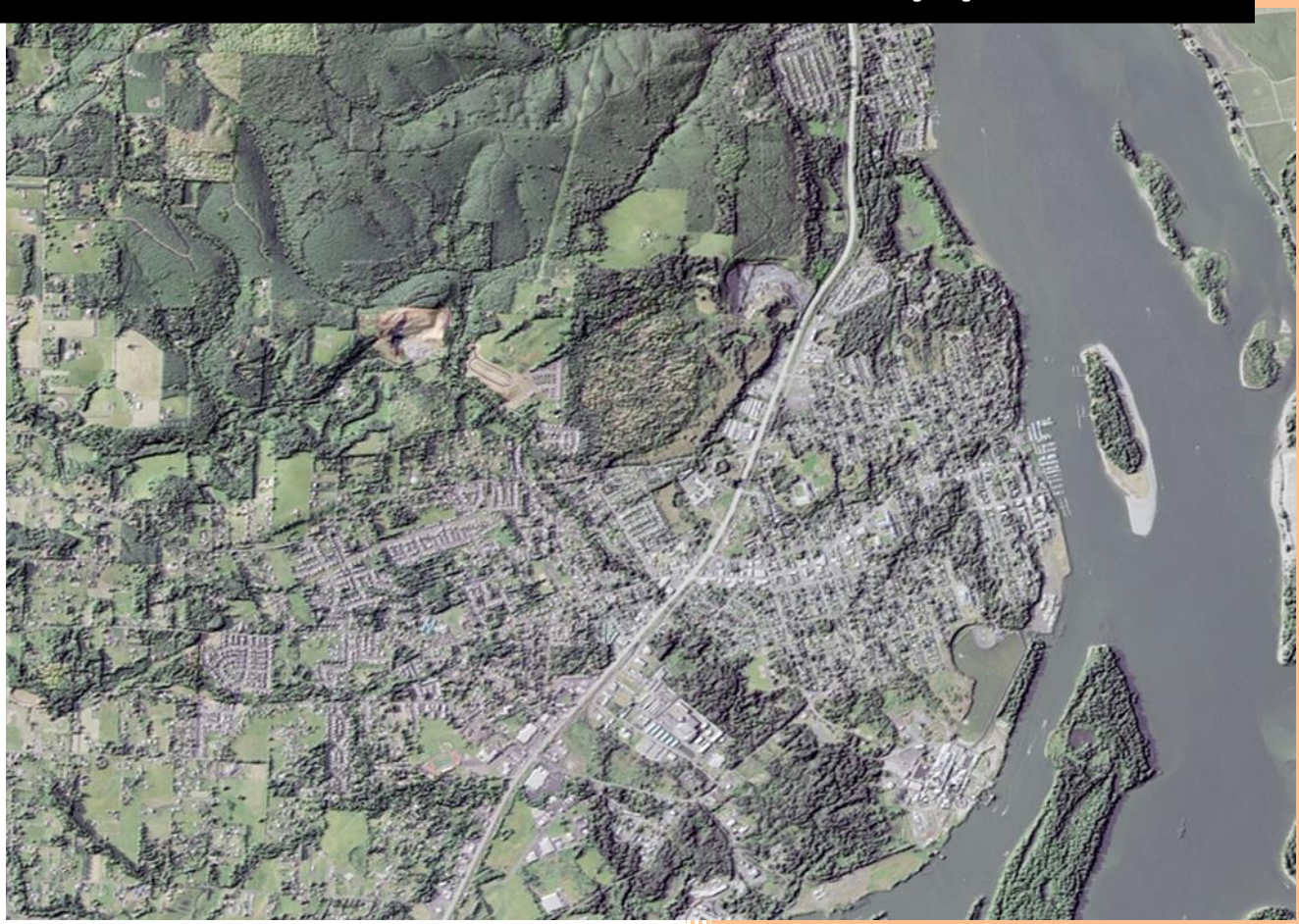
City of St. Helens

Housing Needs Analysis
Volume 2: Technical Appendix



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April 24, 2019

ACKNOWLEDGEMENTS

This work is made possible through the sincere input by City staff and the St. Helens Planning Commission as well as the numerous community members who participated in the process by attending meetings and providing input. We specifically recognize and appreciate the time and attention dedicated to this work by the following people.

City of St. Helens Staff

Rick Scholl, Mayor

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TABLE OF CONTENTS

Section I. INTRODUCTION

The St. Helens Housing Needs Analysis (HNA) is intended to serve as a basis for the City to explore and document new information regarding the City's buildable land inventory (BLI), population and employment trends, and development policies and objectives aimed at strengthening the local economy and providing adequate land to handle the next 20 years of growth. The HNA evaluates housing demand, land needs policies to meet state and local housing objectives.

I.A. OREGON REGULATORY REQUIREMENTS

The City of St. Helens (City) is in the process of updating the Housing Element of its Comprehensive Land Use Plan. FCS GROUP in conjunction with the Oregon Department of Land Conservation and Development (DLCD) is providing technical assistance to the City by preparing products that will comprise an up-to-date Housing Needs Analysis (HNA) for the City. Major HNA technical work products will include the following:

- A housing needs forecast for the St. Helens Urban Growth Boundary (UGB)
- A buildable land inventory (BLI) for residential and mixed-use designations in the UGB
- A residential land needs analysis for accommodating a 20-year housing demand forecast
- Identification of local policy measures for accommodating needed housing

Please refer to the Glossary for a list of terms used in the Housing Needs Analysis.

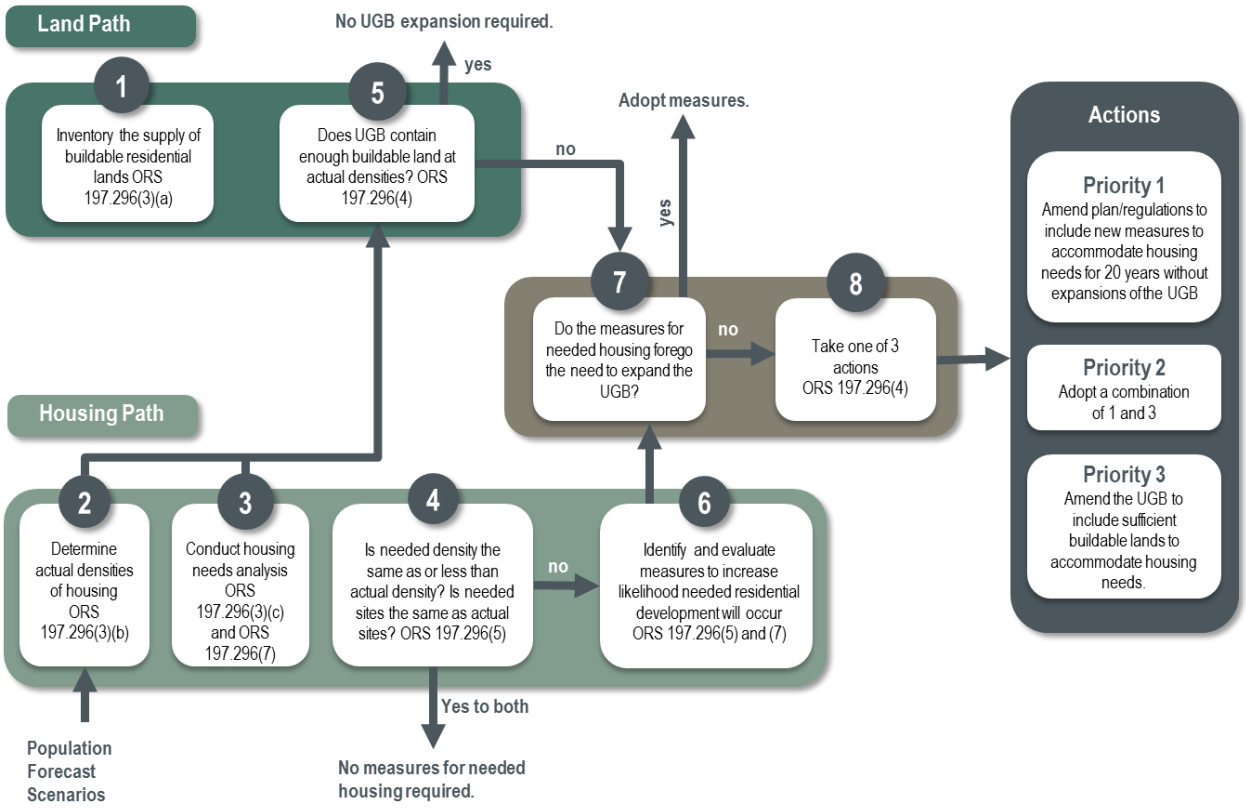
HNA Methodology

The approach used for the St. Helens HNA and related steps are illustrated in Exhibit I.2. This approach is consistent with the DLCD Goal 10 administrative rule, the supporting statutes, as well as guidance provided per the DLCD guidebook titled: Planning for Residential Growth (1997).

While ORS 197.296 specifically applies to cities with 25,000 or more population, this statute is generally followed to determine housing needs for St. Helens (2017 pop. 13,240). This analysis incorporates 20-year population growth for the St. Helens Urban Growth Boundary (UGB) based on forecasts provided by Portland State University's Population Research Center.

The results from the St. Helens HNA indicate that no UGB expansion is required at this time to accommodate planned residential development over the next 20-years. Priority 1 Actions have been identified and are described in Volume 1 of the St. Helens HNA.

Exhibit I.2: St. Helens HNA Methodology and Approach



I.B. REPORT ORGANIZATION

This report provides the technical basis of findings to support proposed economic development and housing policy recommendations. Each section of this report provides current data, assumptions and results that comprise all findings and conclusions:

I. Introduction: summarizes what's considered when updating the housing elements of St. Helens's Comprehensive Land Use Plan.

II. Housing Trends and Needs Forecasts: provides a demographic overview and summary of market trends influencing housing growth in St. Helens.

III. Buildable Land Inventory: depicts vacant, part vacant and redevelopable residential land within the St. Helens UGB, and accounts for unbuildable land constraints. .

IV. Land Needs Reconciliation: forecasts housing growth and residential land needs for various housing types, and compares expected land demand to vacant land supply.

V. Community Input: highlights input obtained from community outreach, interviews and surveys.

VI. Glossary: list of key terms used in the housing needs analysis.

Section II. Housing Needs Projection

INTRODUCTION

The City of St. Helens (City) is in the process of updating the Housing Element of its Comprehensive Land Use Plan. FCS GROUP in conjunction with the Oregon Department of Land Conservation and Development (DLCD) is providing technical assistance to the City by preparing products that will comprise an up-to-date Housing Needs Analysis (HNA) for the City. Major HNA technical work products include the following:

- A housing needs forecast for the St. Helens Urban Growth Boundary (UGB)
- A buildable land inventory (BLI) for residential and mixed-use designations in the UGB
- A residential land needs analysis for accommodating a 20-year housing demand forecast
- Identification of local policy measures for accommodating needed housing

This Section addresses the first item listed above by providing a housing needs forecast for long-range planning purposes.

The housing needs forecast represents a 20-year projection from 2019 through year 2039. These technical findings are also intended to be consistent with State of Oregon requirements for determining housing needs per Oregon land use planning Goals 10 and 14, OAR Chapter 660, Division 8, and applicable provision of ORS 197.295 to 197.314 and 197.475 to 197.490. ORS 197.303 was recently amended by passage of SB 1051 in 2017. Specifically, Section (1) now reads as follows:

"As used in ORS 197.307 (Effect of need for certain housing in urban growth areas), "needed housing" means all housing on land zoned for residential use or mixed residential and commercial use that is determined to meet the need shown for housing within an urban growth boundary at price ranges and rent levels that are affordable to households within the county with a variety of incomes, including but not limited to households with low incomes, very low incomes and extremely low incomes, as those terms are defined by the United States Department of Housing and Urban Development under 42 U.S.C. 1437a."

Funding for this project was provided to the City of St. Helens as a part of statewide legislation (SB 1051) aimed at addressing housing affordability issues throughout Oregon. Namely, the issue of "severely rent burdened" households (those which spend more than 50% of income on rent and utilities), a condition which over 25% of households in St. Helens are currently facing.

METHODOLOGY

The methodology for determining housing needs within the St. Helens UGB includes consideration of demographic and socio-economic trends, housing market characteristics and long-range population growth projections.

Regional (Columbia County) and local (City or UGB) population, households, income and market characteristics are described in this memorandum using data provided by sources such as the U.S. Census Bureau (Census and American Community Survey), the U.S. Department of Housing and Urban Development (HUD), Oregon Department of Housing and Community Services (OHCS), Portland State University (PSU) and the City of St. Helens. Where trends or long-range projections are provided by an identified data source, FCS GROUP has included extrapolations or interpolations of the data to arrive at a base year (2019 estimate) and forecast year (2039 projection). The result of this forecast translates population growth into households and households into housing needs by dwelling type, tenancy (owner vs. renter) and affordability level.

DEMOGRAHIC AND SOCIO-ECONOMICS

II.A.1. Population

The City of St. Helens recorded an all-time high population of 13,240 year-round residents in 2017 (July 1 estimate by PSU). Taking into account residents living outside the city limits but inside the UGB, the total St. Helens UGB population was 15,371 in 2017 (estimate by PSU).

Over the past two decades, St. Helens has grown at a much higher rate than Columbia County. Average annual population growth in St. Helen and Columbia County and has outpaced statewide population growth rates as well (**Exhibit 2.1**).

Long-range population forecasts prepared by PSU anticipate approximately 3,617 residents will be added to the St. Helens UGB between 2019 and 2039. This equates to an annual average growth rate (AGR) of 1.0% and a 37% "capture rate" of future County-wide population growth for the St. Helens UGB (**Exhibit 2.2**).

Exhibit 2.1: Population Trends (2000-2017)

	2000	2010	2017	AGR 2000-2017
St. Helens City	10,019	12,890	13,240	1.7%
Columbia County	43,560	49,430	51,345	1.0%
Oregon	3,421,399	3,837,300	4,141,100	1.1%

Source: U.S. Census Bureau and Portland State University Population Research Center.

Abbreviations: AGR - Annual Growth Rate

Exhibit 2.2: Population Projections (2019-2039)

	Estimate 2019	Forecast 2039	Proj. Change 20 Years	Proj. AGR (2019-2039)
St. Helens UGB	15,693	19,310	3,617	1.0%
Columbia County	52,225	61,902	9,677	0.9%
Oregon	4,224,122	5,151,616	927,494	1.0%

Source: Portland State University Population Center
Forecasts of Oregon's County Populations and Components of Change, 2017 - 2068
Compiled by FCS GROUP. AGR = Average Annual Growth Rate

II.A.2. Income and General Characteristics

Median household and family income levels in St. Helens are below those observed in Columbia County and the state. This may be partially attributable to the relatively high concentration of young families in St. Helens (**Exhibit 2.3-2.4**).

Exhibit 2.3: Households by Income Level, 2016

	City of St. Helens	Columbia County	Oregon
Median Household Income	$45,789	$57,449	$56,119
Median Family Income	$56,541	$69,295	$69,031
Household Income Level			
$0 to $29,999	31.7%	27.1%	26.4%
$30,000 to $49,999	22.2%	17.9%	18.4%
$50,000 to $99,999	30.2%	33.7%	31.5%
$100,000 or more	15.9%	21.3%	23.8%
Total Households	100.0%	100.0%	100.0%

Source: 2013-2017 American Community Survey 5-Year Estimates for
City of St. Helens, Columbia County, and State of Oregon (Tables B19001, DP03)

As indicated in **Exhibit 2.4**, the two youngest cohorts (0-19 and 20-44) represent a larger share of the population in St. Helens relative to Oregon and Columbia County. Meanwhile, the cohorts that traditionally represents retirees (65 and older) is relatively low.

Exhibit 2.4: Population by Age Cohort, 2017

Age Range	City of St. Helens	Columbia County	Oregon
0 to 19	28.9%	24.3%	23.9%
20 to 44	31.5%	28.0%	33.6%
45 to 64	27.3%	30.1%	26.2%
65 and older	12.2%	17.5%	16.3%
Total	100.0%	100.0%	100.0%

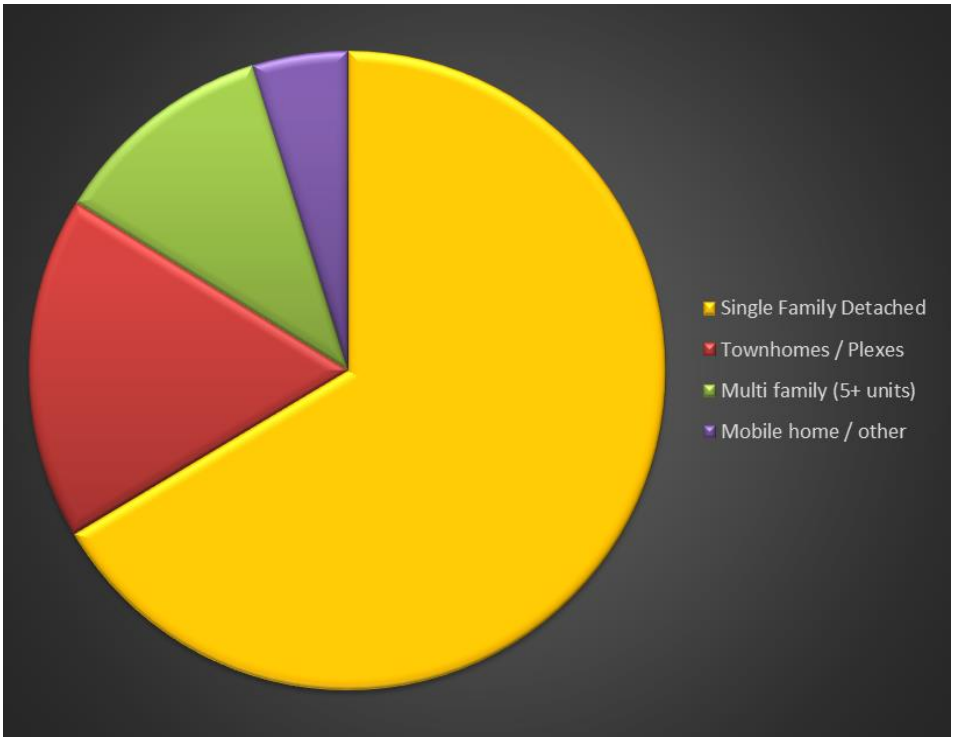
Source: 2013-2017 American Community Survey 5-Year Estimates (Table DP05).

HOUSING INVENTORY AND TENANCY

The current housing inventory, mix and tenancy sheds light on existing conditions locally as well as market demand preferences. According to the 2013-2017 American Community Survey, there were an estimated 5,100 housing units in the City of St. Helens in 2017, of which 4,798 units were classified as occupied while 302 units were classified as vacant.

Like most Oregon cities, single-family detached housing is the most prevalent housing type in St. Helens, representing 66% of the housing stock. The remaining housing inventory in St. Helens includes multi-family units (11% of the inventory), townhomes and duplexes (17%), and mobile homes and other units (5%), as shown in **Exhibits 2.5-2.6**.

Exhibit 5: Existing Housing Mix and Tenancy, 2013-2017, City of St. Helens



Source: U.S. Census, American Community Survey, 2013-2017.

According to the 2013-2017 U.S. Census, ACS estimates, owner-occupied housing units in the City of St. Helens account for 55% of the housing inventory while renter-occupied units account for 37% and 8% of the overall units were vacant. Most home owners reside in single-family detached units or manufactured homes/other units.

The majority of renters reside in townhouses or duplexes at 38%, closely followed by multi-family housing units (structures with 5 units or more) and then single-family detached homes (see **Exhibits 2.6-2.8**).

Exhibit 2.6: Units by Tenure by Structure Type, 2013-2017, City of St. Helens

Housing Type	Owner-Occupied Dwelling Units	Renter-Occupied Dwelling Units	Vacant Units	All Dwelling Units
Single Family Detached	2,690	576	292	3,558
Townhomes / Plexes	99	737	75	911
Multi family (5+ units)	0	622	56	678
Mfg. home / other	142	15	14	171
Total Units	**2,931**	**1,950**	**437**	**5,318**
Distribution	55%	37%	8%	100%

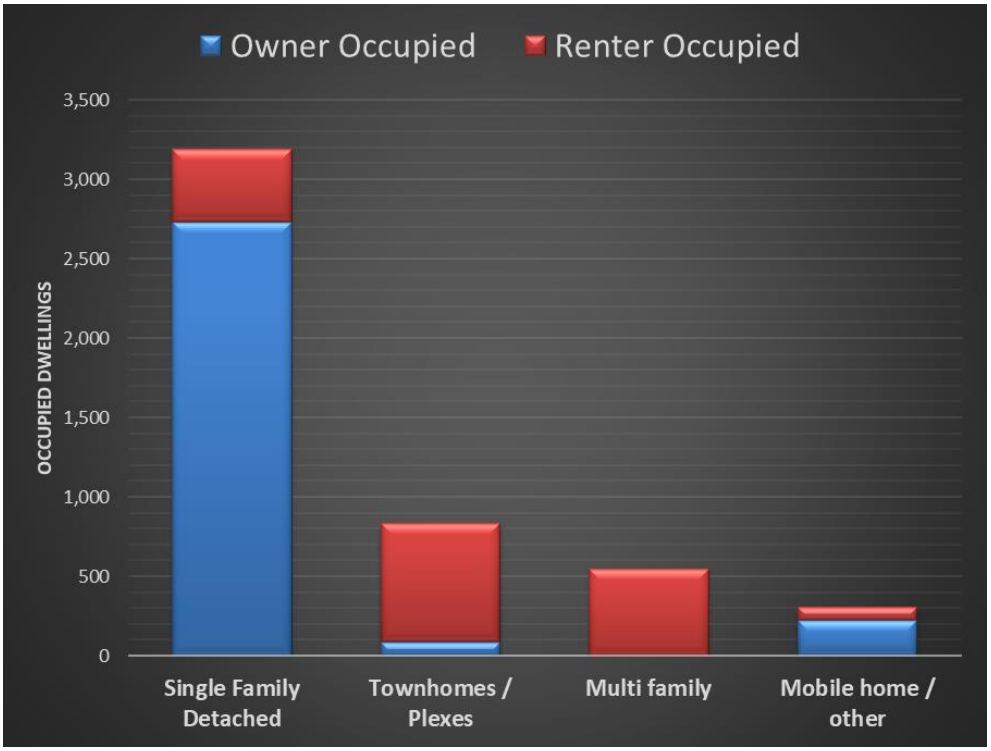
Source: American Community Survey, 2013-2017; compiled by FCS GROUP.

Exhibit 2.7: Share of Units by Tenure by Structure Type, 2013-2017, City of St. Helens

Housing Type	Owner-Occupied Dwelling Units	Renter-Occupied Dwelling Units	Other Vacant Units	All Dwelling Units
Single Family Detached	92%	30%	67%	67%
Townhomes / Plexes	3%	38%	17%	17%
Multi family (5+ units)	0%	32%	13%	13%
Mfg. home / other	5%	1%	3%	3%
Total	100%	100%	100%	100%

Source: American Community Survey, 2013-2017; compiled by FCS GROUP.

Exhibit 2.8: Existing Housing Tenancy, 2013-2017, City of St. Helens



Source: U.S. Census, American Community Survey, 2013-2017.

II.A.3. Subsidized Housing Inventory

A 2016-17 statewide study of housing affordability was led by the OHCS which included all cities and counties, including Columbia County and the City of St. Helens. The study included an inventory of existing housing units subsidized by nonprofits, local, state, or federal entities in each community and compared the housing supply to the need (based on an equitable distribution of the total statewide inventory) for subsidized housing.

Overall findings from the subsidized housing inventory/needs analysis for the City of St. Helens and Columbia County are reflected in **Exhibit 2.9**. The OHCS study concluded that there were 294 subsidized affordable housing units in St. Helens, which was slightly in excess of the City's equitable statewide (demand) allocation.

Exhibit 2.9: Current Inventory of Subsidized Housing Units

	City of St. Helens	Columbia County
Affordable Housing Units in Inventory	294	455
Need (Equity) Distribution Percent	0.3%	0.8%
Equitable Distribution of Units	182	496
Actual Units / Equitable Distribution of Units	161.6%	91.7%

Source: Oregon Housing and Community Services Housing Needs Versus Inventory Summary

II.A.4. Housing Attainability Income Levels

To help gauge housing attainability, FCS GROUP examined current median family income (MFI) (**Exhibit 2.10**) and median household income (MHI) (**Exhibit 2.11**) level data obtained through the US Census. According to the Census Bureau, the difference between these two indicators is as follows:

> "A family consists of two or more people (one of whom is the householder) related by birth, marriage, or adoption residing in the same housing unit.
>
> A household consists of all people who occupy a housing unit regardless of relationship. A household may consist of a person living alone or multiple unrelated individuals or families living together."

Oregon DLCD guidance for determining housing need by income level requires a housing needs analysis to focus on median family income levels.[1] The 2017 estimate of median family income (MFI) for Columbia County was $74,700. HUD guidelines for housing affordability assume 30% of income is allocated to housing; therefore middle-income families earning 80% of the MFI, a 4-person family should be able to afford monthly rents at $1,494 or lower and homes priced at less than

[1] Oregon DLCD guidance noted per email from Kevin Young (DLCD) dated 1/24/19.

$296,000. These price levels should be considered "attainable" to families earning 80% of the local MFI.

Using 2017 MFI statistics, the monthly affordable housing cost for low-income families in St. Helens is as follows:

- Extremely Low Income, $560 or less
- Very Low Income, $560 to $934
- Low Income, $934 to $1,494

If families within these classifications pay more than these amounts they will be "rent burdened" to some degree.

Exhibit 2.10: St. Helens Housing Cost Analysis (Based on Columbia County Median Family Income)

Columbia County Median Family Income (2017)*	$74,700	
Available Monthly Rent or Payment (@30% of income level)	**Lower-end**	**Upper-End**
Upper (120% or more of MFI)	$2,241	or more
Middle (80% to 120% of MFI)	$1,494	$2,241
Low (50% to 80% of MFI)	$934	$1,494
Very Low (30% to 50% of MFI)	$560	$934
Extremely Low (less than 30% of MFI)	$560	or less
Approximate Attainable Home Price**	**Lower-end**	**Upper-End**
Upper (120% or more of MFI)	$444,000	or more
Middle (80% to 120% of MFI)	$296,000	$444,000
Low (50% to 80% of MFI)	$185,000	$296,000
Very Low (30% to 50% of MFI)	$111,000	$185,000
Extremely Low (less than 30% of MFI)	$111,000	or less

Notes:

** based on Housing and Urban Development thresholds for Columbia County in 2017*

Note, this analysis is generally consistent with 4-person household size characteristics.

*** assumes 20% down payment on 30-year fixed mortgage at 6.0% interest.*

Source: analysis by FCS Group using Housing and Urban Development, and US Census data.

In contrast, if the rubric is 2017 MHI statistics, the monthly affordable housing cost for low-income families in St. Helens is as follows:

- Extremely Low Income, $431 or less
- Very Low Income, $431 to $719
- Low Income, $719 to $1,150

If households within these classifications pay more than these amounts they will be "rent burdened" to some degree.

Exhibit 2.11: St. Helens Housing Cost Analysis (Based on Columbia County Median Household Income)

Columbia County Median Household Income (2017)*	$57,499	
Available Monthly Rent or Payment (@30% of income level)	**Lower-end**	**Upper-End**
Upper (120% or more of MHI)	$1,725	or more
Middle (80% to 120% of MHI)	$1,150	$1,725
Low (50% to 80% of MHI)	$719	$1,150
Very Low (30% to 50% of MHI)	$431	$719
Extremely Low (less than 30% of MHI)	$431	or less
Approximate Attainable Home Price**	**Lower-end**	**Upper-End**
Upper (120% or more of MHI)	$342,000	or more
Middle (80% to 120% of MHI)	$228,000	$342,000
Low (50% to 80% of MHI)	$142,000	$228,000
Very Low (30% to 50% of MHI)	$85,000	$142,000
Extremely Low (less than 30% of MHI)	$85,000	or less

Notes:

* based on U.S. Census 2013-2017 American Community Survey Data

** assumes 20% down payment on 30-year fixed mortgage at 6.0% interest.

Source: analysis by FCS Group using Housing and Urban Development guidelines, and US Census data.

As would be expected, upper-income households tend to own rather than rent, and the opposite is true for lower-income households, as shown in **Exhibit 2.12**.

Exhibit 2.12: St. Helens Tenancy by Income Level

Qualifying Income Level	Lower-end	Upper-End	Count Owner Occupied	Count Renter Occupied	% Owner Occupied	% Renter Occupied
Upper (120% or more of MFI)	$89,640	or more	950	89	32.3%	4.5%
Middle (80% to 120% of MFI)	$59,760	$89,640	433	113	14.7%	5.8%
Low (50% to 80% of MFI)	$37,350	$59,760	804	466	27.4%	23.9%
Very Low (30% to 50% of MFI)	$22,410	$37,350	480	560	16.3%	28.7%
Extremely Low (less than 30% of MFI)	$22,410	or less	272	722	9.2%	37.0%
Total			**2,939**	**1,950**	**100%**	**100%**

Source: US Census Bureau 2013 - 2017 ACS (Table S2503), compiled by FCS GROUP

An evaluation of renter income levels versus available housing inventory indicates that there is a current shortfall or gap in available rental housing inventory in St. Helens at the upper- and lower-price points (**Exhibit 2.13**). This is understandable at the lowest price points where there is almost always more demand than supply. The fact that there is more housing demand for good quality rentals than what is in the current supply reflects an aging housing inventory and demonstrates strong "pent up" demand for new apartments that rent for over $1,250 per month (with 2+ bedrooms).

It is likely that near-term multifamily development in St. Helens would address a significant share of the pent up housing need. Total pent-up demand is assumed to equate to 150 apartment units based on likely capture rates for market rate housing and development of government assisted housing.

Exhibit 2.13: Rental Housing Gaps, City of St. Helens, 2017

St. Helens Rental Housing Gap Analysis, 2017

Income Range	Affordable Monthly Rent Costs *	Renter-Occupied Households	Estimated Available Rental Units	Gap or Surplus	Pent Up Demand		Capture Rate for Analysis	Pent Up Housing Demand
$75,000 or more:	$1,875	153	124	(29)	(53)	market rate gap	75%	40
$50,000 to $74,999:	$1,250-$1,875	232	208	(24)				
$35,000 to $49,999:	$875-$1,250	370	571	201				
$20,000 to $34,999:	$500-$875	562	793	231				
Less than $20,000:	Less than $500	529	212	(317)	(335)	subsidized housing gap	33%	111
Zero or negative income	Requires Subsidy	61	43	(18)				
Total		**1,907**	**1,950**	**43**	(388)			**150**

Source: Previous Tables; and assumptions as stated.

* Calculated as 30% of income range based on HUD guidelines

HOUSING MARKET ANALYSIS

American Community Survey data from the 2006-2010 and 2013-2017 series' show that the number of units classified as renter-occupied in St. Helens increased by 216 (a rate of 31 per year) while dwellings identified as owner-occupied appear to have decreased during this time period (**Exhibit 2.14**). Note, these Census estimates include a standard error that may account for some of this variation in housing unit counts.

As mentioned previously in this report, the majority of housing in St. Helens is classified as single-family detached units, however, recent development patterns suggest a shift towards a more diverse mix of housing types. Between 2010 and 2017, most housing growth in the City has occurred in townhomes or plexes (31 units on average per year), multifamily (23 units on average per year), and mobile or manufactured homes (5 units on average per year).

Census estimates between 2010 and 2016 indicate that median home values in the City may have decreased slightly while rents increased. More recent trends indicate that median housing prices in St. Helens are now increasing as the City continues to grow.

Exhibit 2.14: St. Helens Housing Inventory (2010-2017)

	2010 ACS	2017 ACS*	2010-2017 Avg. Annual Change
Owner Occupied	2,997	2,939	-8
Renter Occupied	1,734	1,950	31
Vacant	275	437	23
Total	**5,006**	**5,326**	46
Owner Occupied %	63.3%	60.1%	
Renter Occupied %	36.7%	39.9%	
Total	**100.0%**	**100.0%**	
Vacant Dwellings %	5.5%	8.2%	
Single-Family Detached	3,712	3,645	-10
Townhome/Plexes	686	905	31
Multifamily	411	573	23
Mobile Home	187	222	5
Total	**4,996**	**5,345**	**50**
Median Home Value*	$187,100	$179,300	
Median Gross Rent*	$708	$850	

Source: U.S. Census Bureau American Community Survey (ACS), 2006-10; 2013-2017 .

* Home values and rents were derived from ACS 2012-2016 data (2017 not yet published).

In comparison to other local housing markets, St. Helens home values have been increasing at a significant rate (9.1%) year-over-year (November 2017 and November 2018). As indicated in **Exhibit 2.15**, median home sales prices in St. Helens jumped to $264,000 in November 2018, which is much more in line with home prices in comparable cities.

Exhibit 2.15: Median Home Sales Price Trends in Selected Markets

	Nov-17	Nov-18	Change %
St. Helens	$242,000	$264,000	9.1%
Clatskanie	$211,000	$227,000	7.6%
Forest Grove	$319,000	$337,000	5.6%
Rainier	$278,000	$297,000	6.8%
Scappoose	$300,000	$325,000	8.3%

Source: Zillow.com; analysis by FCS 11/09/18.

Historic housing absorption rates (based on actual new residential building permits) illustrate recent market activity based on availability of vacant land by land use zone classification. The City issued new residential building permits at an average rate of 33 units per year between 2013 and 2017 with total units permitted decreasing slightly every year (**Exhibit 2.16)**. The bulk of units permitted in this timeframe are single family dwellings (27.8 dwellings permitted annually) with other housing types

such as manufactured homes (3.4 units annually), plexes (0.4 units annually), and townhomes (0.2 units annually).

Future housing absorption levels will likely vary widely year to year depending upon several factors, such as national and regional economic activity, mortgage rates, infrastructure availability and development cost.

Exhibit 2.16: Residential Permits Issued by Type, St. Helens (2012-2017)

Type of Units	2013	2014	2015	2016	2017	Average Units Permitted Annually (2013-2017)
Single Family Dwelling	36	36	30	20	17	27.8
Manuf. Home	3	3	2	3	6	3.4
Duplex	1	0	0	0	1	0.4
Tri-Plex	0	0	0	0	1	0.2
Townhouses	4	0	0	2	0	1.2
Total Dwelling Units	**42**	**39**	**32**	**25**	**28**	**33.2**

Source: City Staff.

HOUSING NEEDS SCENARIOS

Summary of Housing Needs

Based on the population forecast described earlier in **Exhibit 2.2** and average household size estimates of 2.68 people per household (current estimate held constant into the future), the total net new housing demand within the St. Helens UGB is projected to be 1,433 housing units over the next 20 years (see **Exhibit 2.17**). This baseline housing need forecast assumes that the current average household size, group quarters share, and housing vacancy rate remains constant.

Exhibit 2.17: Baseline Housing Growth Projection

	Estimate 2019	Forecast 2039	Proj. Change 20 Years	Proj. AGR
St. Helens UGB Population	**15,693**	**19,310**	**3,617**	**1.04%**
Columbia County Population	52,225	61,902	9,677	0.85%
St. Helens Housing Needs				
Group Quarters Population	396	487	91	
Population in Households	15,297	18,823	3,526	
Avg. Household Size	2.68	2.68		
Occupied Housing Units	**5,708**	**7,024**	**1,316**	1.08%
Total Housing Units (baseline)	**6,219**	**7,652**	**1,433**	1.08%
Vacant Housing Units	511	629	118	1.08%
Percent of housing stock vacant	8%	8%	8%	

Source: Findings based on PSU Population Research Center data, Census data, and forecasts consistent with St. Helens UGB growth forecasts; FCS GROUP. AGR = annual average growth rate.

Baseline Housing Demand by Dwelling Type and Tenancy

This baseline housing need forecast is consistent with the observed current mix of housing types throughout St. Helens and emerging market trends.

The baseline housing need forecast (shown in **Exhibit 2.18**) assumes that the UGB will accommodate 1,433 net new dwelling units over the next 20-years. This baseline scenario forecasts housing unit demand to include: 959 single-family detached homes; 245 townhomes/plexes, 183 multifamily units (apartments); and 46 mobile home/manufactured housing units. In addition, the local housing need also includes 37 additional residents that would need to be housed in shared living arrangements, single occupancy units, such as dormitories, congregate care, and other types of shared living arrangements.

Exhibit 2.18: Baseline Housing Need Forecast by Structure Type

	Owner-Occupied Dwelling Units	Renter-Occupied Dwelling Units	Vacant Units	All Dwelling Units	Projected 20-year Change (Units)
Housing Tenure Distribution:	**55.1%**	**36.7%**	**8.2%**	**100.0%**	**1,433**
Housing Unit/Type Distribution					
Single Family Detached	92%	30%	67%	67%	959
Townhomes / Plexes	3%	38%	17%	17%	245
Multi family (5+ units)	0%	32%	13%	13%	183
Mfg. home/other	5%	1%	3%	3%	46
Total Housing Units	**100%**	**100%**	**100%**	**100%**	**1,433**
Group quarters (single room occupancy)					**37**
Grand Total					**1,470**

Source: Previous Tables

It should be noted that these housing forecasts are intended to account for net new housing that would be required to accommodate an increase in population by 3,617 residents, which is consistent with the PSU forecast for the St. Helens UGB. Additional housing would likely be required to replace the aging housing stock or to meet current pent up housing needs which have been expressed in prior tables.

Expected Housing Demand by Dwelling Type and Tenancy

In light of the findings regarding current levels of pent-up housing demand discussed previously, the baseline housing need is expected to be supplemented by 150-units of pent up apartment demand. The resulting total 20-year housing need for St. Helens includes 1,621 units of housing, as summarized below in **Exhibit 2.19.**

Since Oregon SB 1051 resulted in changes to ORS 197.307 (Effect of need for certain housing in urban growth areas), cities are now required to provide adequate land zoned for residential use or commercial use or use land to meet needs of housing within the UGB at price ranges and rent levels that are affordable to households within the county, including but not limited to households with low incomes, very low incomes and extremely low incomes, as defined by U.S. Housing and Urban

Development. An analysis of net new housing need by income level is provided in below in **Exhibits 2.19.**

Exhibit 2.19: St. Helens Total Housing Need Forecast by Income Level and Type

Family Income Level	Owner-Occupied	Renter-Occupied	Total Dwellings	Dist. %	Attainable Housing Products
Upper (120% or more of MFI)	278	35	313	19%	Standard Homes, Townhomes
Middle (80% to 120% of MFI)	127	44	171	11%	Small Homes, Townhomes, Apartments
Low (50% to 80% of MFI)	236	182	417	26%	Small Homes, Townhomes, Mfgd. Homes, Plexes, Apts.
Very Low (30% to 50% of MFI)	140	218	359	22%	ADUs, Govt. Assisted Apts.
Extremely Low (less than 30% of MFI)	80	281	361	22%	Govt. Assisted Apts.
Total	**861**	**760**	**1,621**	100%	

** Source: based on projected housing need and 2017 ACS household income and tenancy data for City of St. Helens.*

Section III. Buildable Land Inventory

OVERVIEW

In accordance with OAR 660-008-0005 (2), an estimate of buildable land inventory (BLI) within the St. Helens Urban Growth Boundary (UGB) has been created to determine that amount of land available to meet housing needs. The BLI analysis method is also consistent with the Oregon DLCD workbook "*Planning for Residential Growth – A Workbook for Oregon's Urban Areas."* The BLI analysis uses the most current Geographic Information Systems (GIS) data provided available for the St. Helens UGB (specific GIS data sources are shown in **Exhibit 3.1**).

Buildable Land Inventory Methodology

The objective of the residential BLI is to determine the amount of developable land available for future residential housing development within the UGB. The steps taken to perform this analysis are as follows:

1. **Calculate gross acres** by plan designation, including classifications for fully vacant and partially-vacant parcels. This step entails "clipping" all of the tax lots that are bisected by the current UGB to eliminate land outside current UGB from consideration for development at this time. City staff input was provided to provide a level of quality assurance to review output is consistent with OAR 660-008-0005(2).

2. **Calculate gross buildable acres** by plan designation by subtracting land that is constrained from future development, such as such as existing public right-of-way, parks and open space, steep slopes, and floodplains.

3. **Calculate net buildable acres** by plan designation, by subtracting future public facilities such as roads, schools and parks from gross buildable acres.

4. **Determine total net buildable acres by plan designation** by taking into account potential redevelopment locations and mixed-use development opportunity areas.

Exhibit 3.1: St. Helens BLI Data Sources

Dataset Name	Type	Description	Source
City Limits	GIS Layer	St. Helens City Limits Boundary	City of St. Helens
CSH UGB	GIS Layer	City of St. Helens Urban Growth Boundary	City of St. Helens
CSH Zoning	GIS Layer	City of St. Helens Zoning Designations	City of St. Helens
CSH Cmpln (in)	GIS Layer	City of St. Helens Comprehensive Plan Designations	City of St. Helens
CSH Cmpln (out)	GIS Layer	UGB Comprehensive Plan Designations	City of St. Helens
CSH Downtown Hist Dist	GIS Layer	City of St. Helens Downtown Historic District Area	City of St. Helens
McNulty Boundary	GIS Layer	McNulty Boundary Area	City of St. Helens
Warren Water Assoc.	GIS Layer	Warren Water Association within St. Helens UGB	City of St. Helens
S_FLD_HAZ_AR	GIS Layer	FEMA Floodways and 100-yr. Floodplains	City of St. Helens
LX_WWET_L	GIS Layer	Wetlands Inventory	City of St. Helens
Landslide_haz_region	GIS Layer	Landslide regions as identified by Hazard Category	City of St. Helens
Taxlots_(2018SEPT)	GIS Layer	Tax lots with Assessed Value and Property Class Code	City of St. Helens
taxlot19	GIS Layer	Tax lots with various lot identifiers. No valuation data.	City of St. Helens
LOOKUP_PROPERTY_CLASS	Tabular	Lookup Table for Assessed Value Property Class and Type	Columbia County Assessor[1]
LOOKUP_RMV_PROPERTY_CLASS	Tabular	Lookup Table for Real Market Value Property Class and Type	Columbia County Assessor[1]
ValueSummary	Tabular	Summation table of land and improvement values for tax lots	Columbia County Assessor[1]
NAIP 2016	GIS Service	Web service providing aerial imagery	Oregon-GEO[2]

1 - http://www.co.columbia.or.us/departments/assessors-office-main/property-records-online
2 - http://imagery.oregonexplorer.info/arcgis/services

The detailed steps used to create the land inventory are described below.

RESIDENTIAL LAND BASE

The residential land base reflects current St. Helens Comprehensive Plan land use designations (Comprehensive Plan maps for City and County areas are provided as **Exhibits 3.2 and 3.3**).

Properties that are within the residential land base include the following classifications:

Residential Comprehensive Plan Use Classifications

- Suburban Residential (SR)
- Rural Suburban Unincorporated Residential (RSUR)
- General Residential (GR)
- Mobile Home Residential (MHR)
- Unincorporated General Residential (UGR)
- Unincorporated Multi-Family Residential (UMFR)
- Unincorporated Mobile Home Residential (UMHR)

In addition, commercial land on which housing development is allowed was included the following Comprehensive Plan classifications:

Commercial and Mixed-Use Comprehensive Plan Land Use Classifications

- General Commercial (GC)
- Unincorporated General Commercial (UGC)
- Unincorporated Highway Commercial (UHI)

For analysis purposes, each of these Comprehensive Plan classifications have been grouped into four residential development categories that represent the expected level of development based on the housing types/densities that are permitted by the City (housing types must be permitted outright or by conditional development approval). This includes: low, medium and high density residential categories; as well as a commercial/mixed use category (which allows a mix of medium and high density housing).

Draft BLI findings and results were reviewed by City Staff and subjected to public review, then refined accordingly based on the input received.

Exhibit 3.2. City of St. Helens Comprehensive Plan Designations

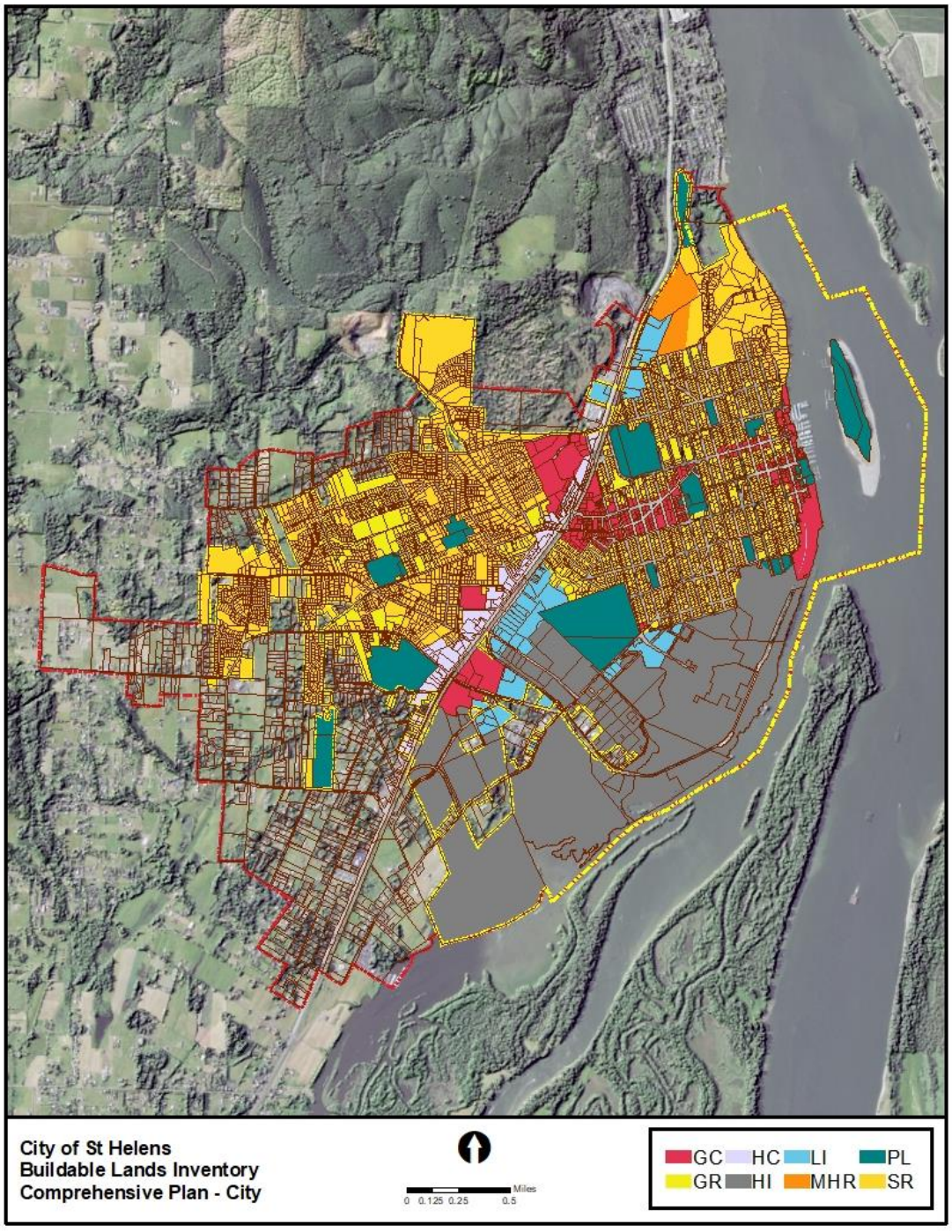
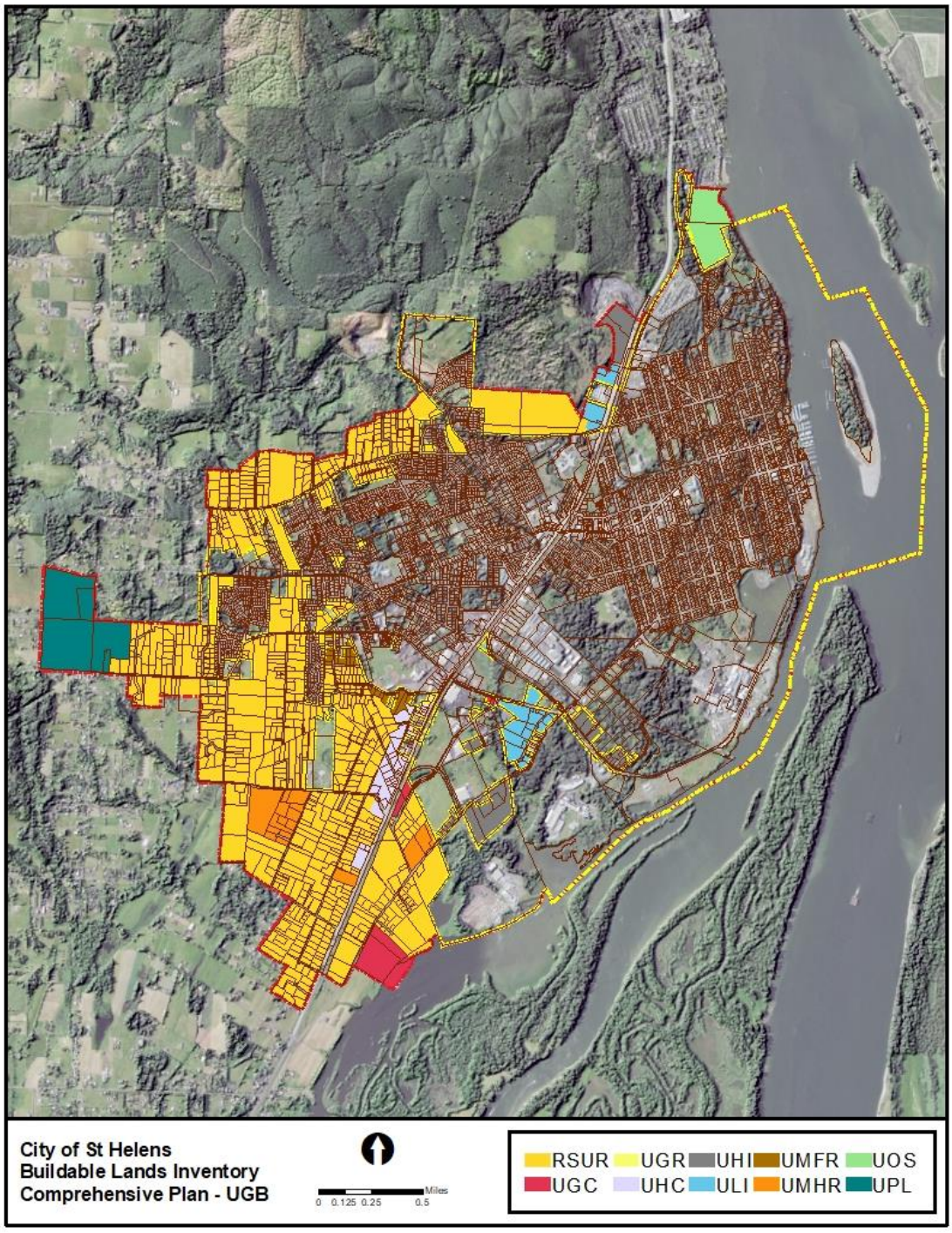


Exhibit 3.3. St. Helens UGB Comprehensive Plan Designations (outside city)



LAND CLASSIFICATIONS

The next step includes classifying each tax lot (parcel) into one of the following categories.

- **Vacant land**: Properties with no structures or have buildings with very little value. For purpose of the BLI, residential lands with improvement value less than $10,000 are considered vacant. These lands were also subjected to review using aerial photography; and if the land is in a committed use such as a parking lot, an assessment has been made to determine if it is to be classified as vacant, part vacant or developed.
- **Partially vacant land:** Properties that are occupied by a use (e.g., a home or building structure with value over $10,000), but have enough land to be subdivided without the need for rezoning. This determination is made using tax assessor records and aerial photography. For lots with existing buildings, it is assumed that ¼ acre (10,890 sq. ft.) is retained by each existing home, and the remainder is included in the part vacant land inventory.
- **Vacant Undersized:** Properties that are vacant with less than 3,000 sq. ft. of land area. While this land area is not likely large enough to accommodate standard detached housing units, it may be suitable for accessory dwelling units (ADUs).
- **Developed & Non-Residential Land Base:** Properties unlikely to yield additional residential development for one of two reasons: they possess existing building structures at densities and are unlikely to redevelop over the planning period; or they include parcels with Comprehensive Land Use Plan designations not included in the aforementioned residential land use classifications.
- **Public and Constrained (unbuildable) land**: Properties which are regarded as unlikely to be developed because they are: under a certain size (3,000 square feet) or being restricted by existing uses such as: public ownership, roads and public right-of-way (ROW); common areas held by Home Owners Associations, parks/open space/recreation areas; cemeteries; and power substations.

These tax lot classifications were validated using aerial photos, building permit data, and assessor records. Preliminary results were refined based on City staff and public input received during the Housing Needs Analysis (HNA) planning process.

DEVELOPMENT CONSTRAINTS

The BLI methodology for identifying and removing development constraints is consistent with state guidance on buildable land inventories per OAR 660-008-0005(2). By definition, the BLI is intended to include land that is "suitable, available, and necessary for residential uses."

"Buildable Land" includes residential designated land within the UGB, including vacant, part vacant and land that is likely to be redeveloped; and suitable, available and necessary for residential uses. Public-owned land is generally not considered to be available for residential use unless it is the intent of the public agency to see it developed for residential (i.e., as part of a public/private development or redevelopment project).

Land is considered to be "suitable and available" unless it is:

- Is severely constrained by natural hazards as determined by the Statewide Planning Goal 7;
- Is subject to natural resource protection measures determined under Statewide Planning Goals 5, 6, 15, 16, 17 or 18;
- Has slopes over 25 percent;
- Is within the 100-year flood plain; or
- Cannot be provided with public facilities.

Based on state guidelines and data provided by the City of St. Helens, the following constraints have been deducted from the residential lands inventory.

- Land within waterbodies and floodways. Lands identified within waterbodies and floodways per the FEMA FIRM maps.
- Land within floodplains. This includes lands in flood-hazard areas (the 100-year floodplain) from the buildable land inventory.
- Land within wetlands. This includes areas identified as an environmental constraint in the St. Helens Comprehensive Plan. It should be noted that wetlands are locally protected from future development according to the St. Helens Municipal Code (SHMC) 17.40.
- Land with slopes greater than 25%. This includes land slide hazard areas identified in the St. Helens Comprehensive Plan.
- Land within natural resource protection measures. This includes parks and open spaces that are identified in the St. Helens Comprehensive Plan.

Exhibits 3.4-3.7 illustrate these types of "environmental" constraints.

Exhibit 3.4. Floodplains and Waterways

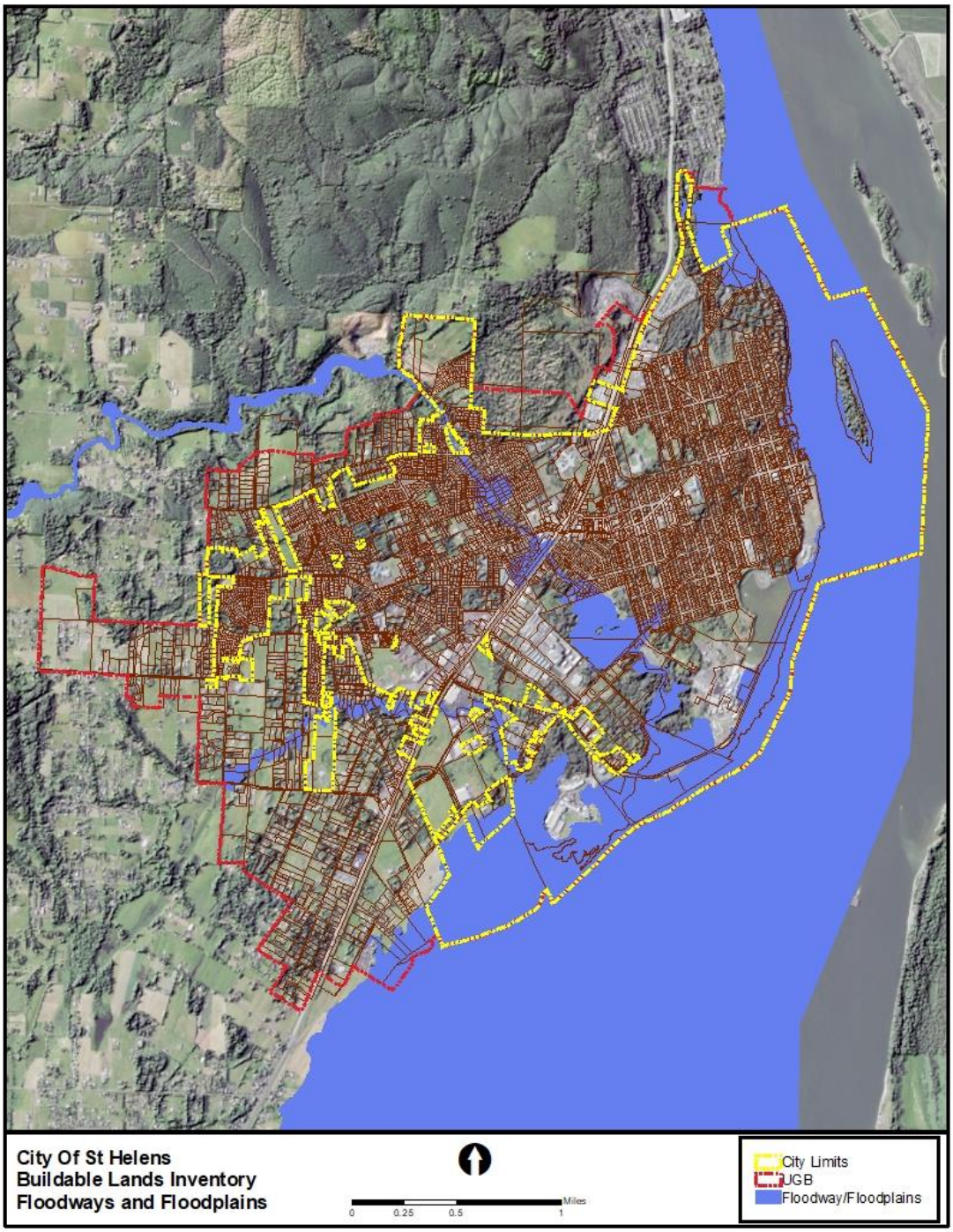


Exhibit 3.5. Wetlands

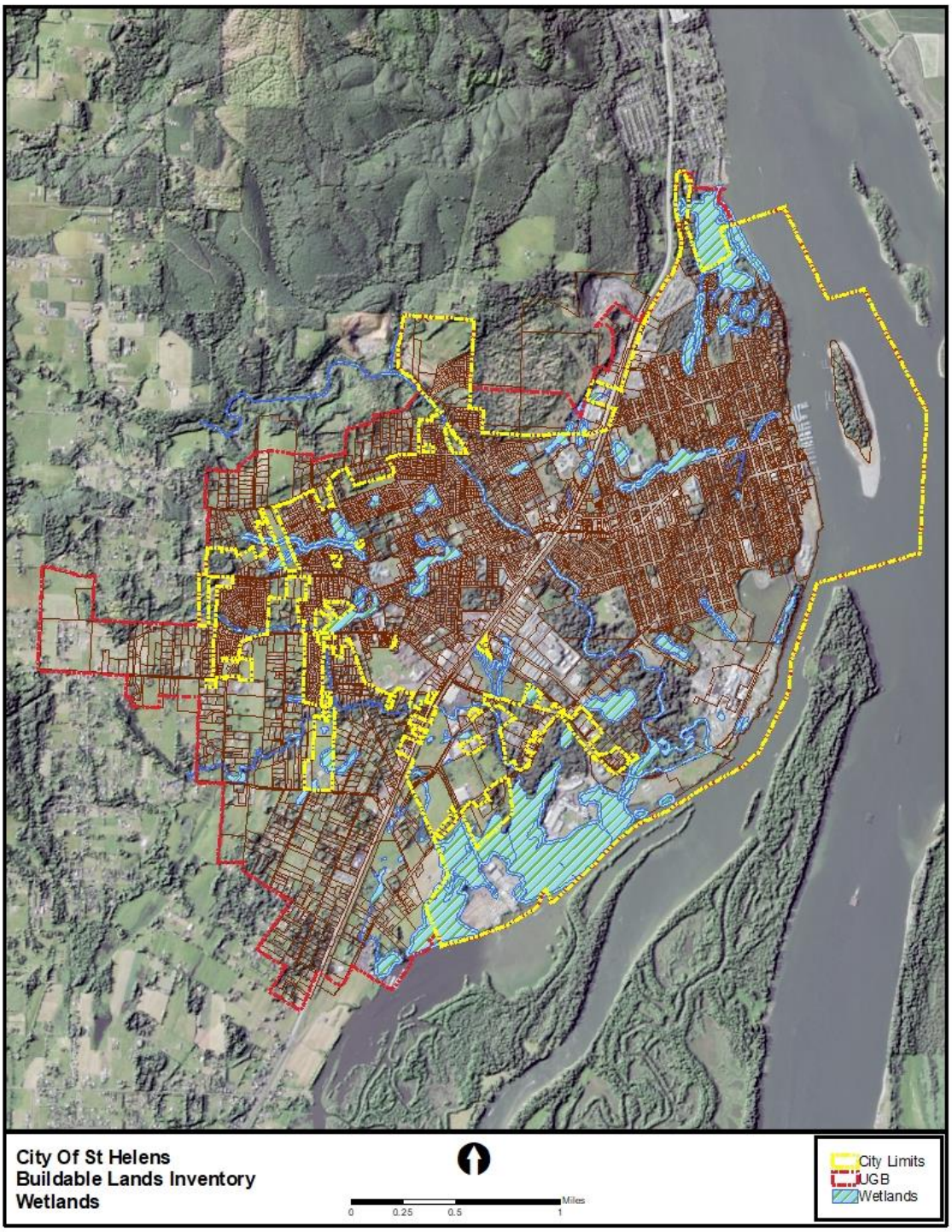


Exhibit 3.6. Land Slide Hazard Areas (slopes over 25%)

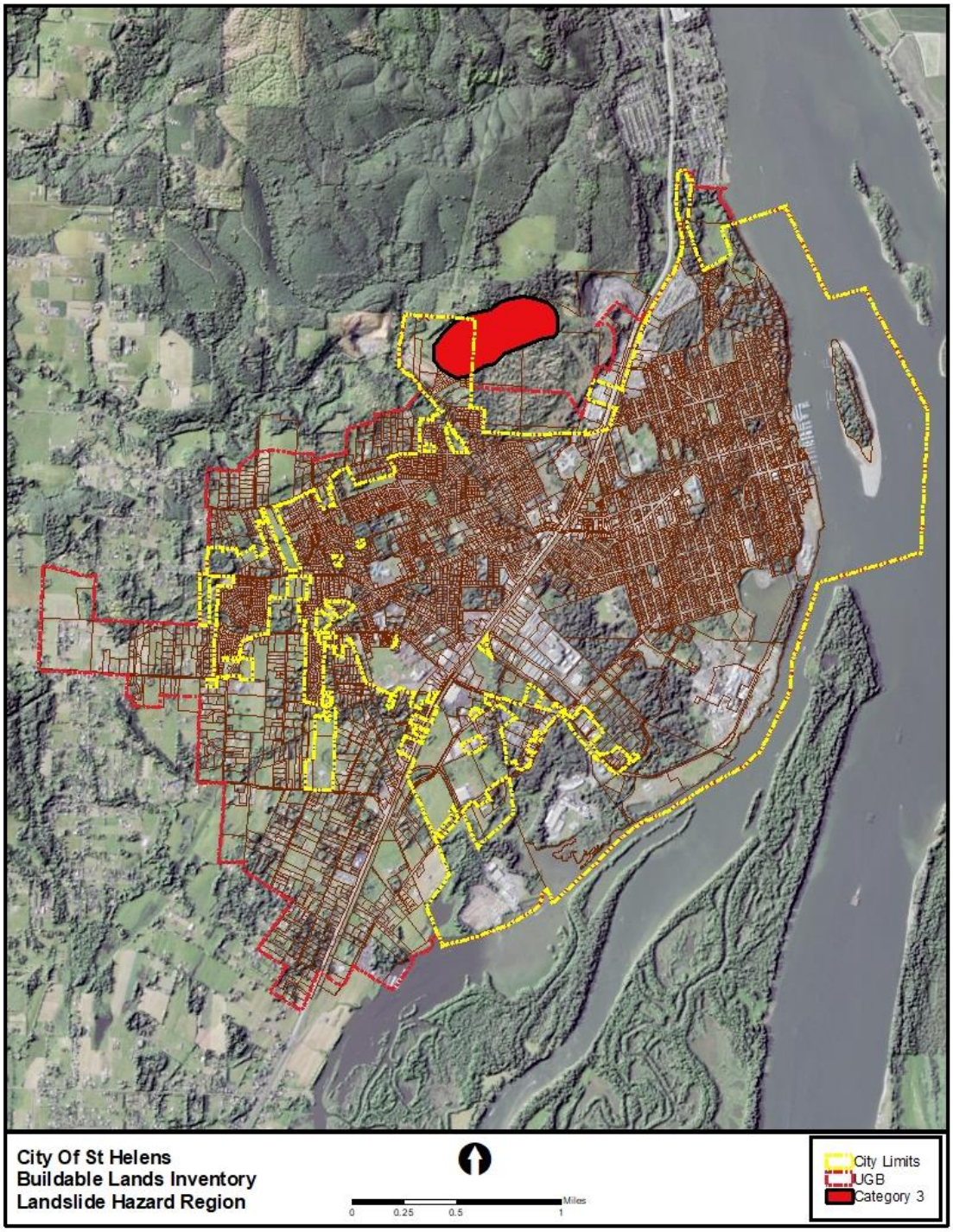
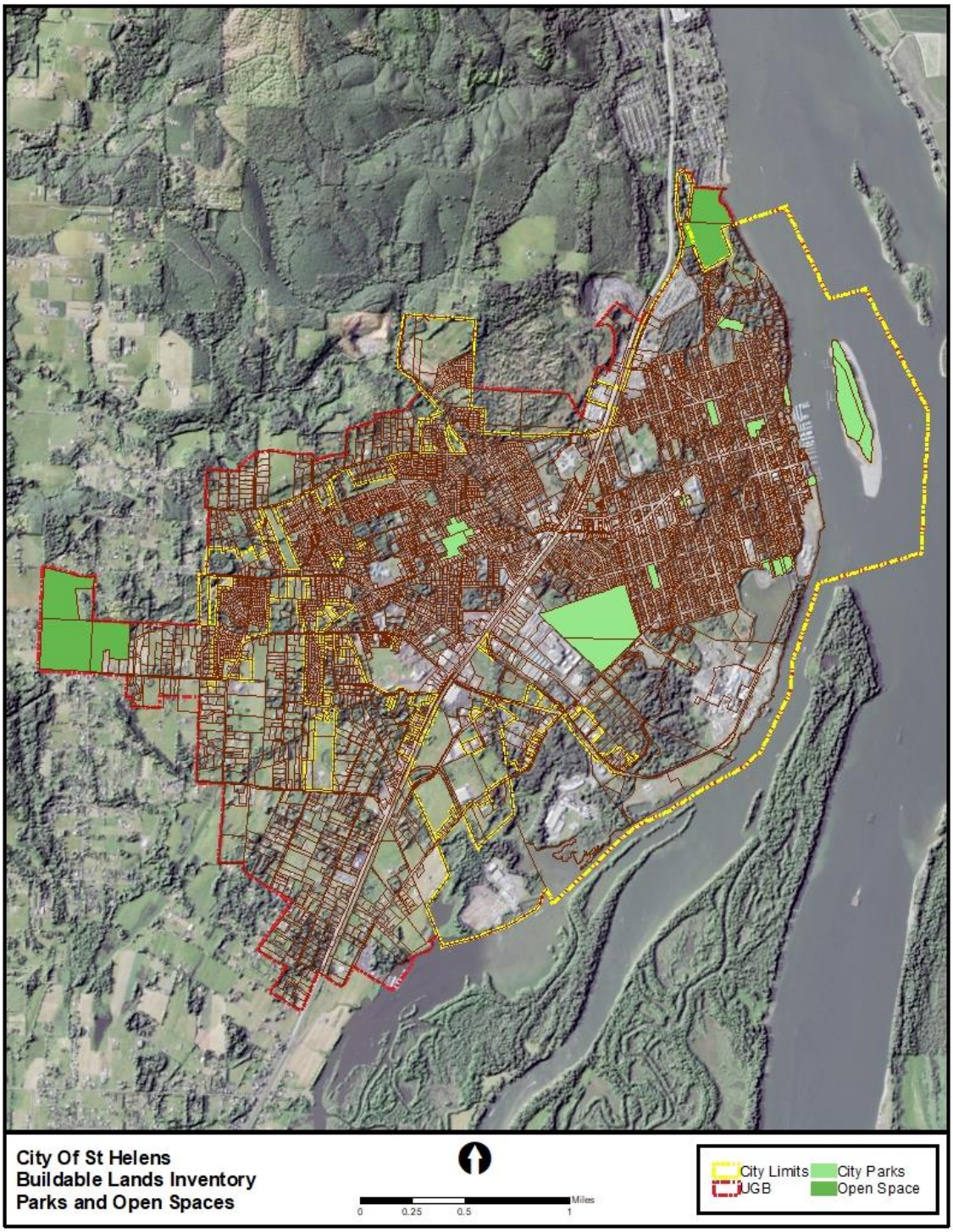


Exhibit 3.7. Parks and Open Space



RESIDENTIAL BUILDABLE LAND INVENTORY RESULTS

Land Base

As noted above, the residential land base for the BLI includes all tax lots in the UGB in residential, commercial and mixed-use designations. A summary of the land base by generalized plan designation is provided in **Exhibit 3.8**. The findings indicate that there are 5,952 tax lots in the land base with 3,130 gross acres.

Exhibit 3.8: Gross Acreage in Residential Land Base, St. Helens UGB

Generalized Plan Designation	Number of Taxlots	Percent	Total Gross Acres	Percent
Low-Density Residential	2,676	45%	1,887	60%
Medium-Density Residential	2,101	35%	698	22%
High-Density Residential	539	9%	206	7%
Commercial/Mixed Use	636	11%	338	11%
Total	**5,952**	**100%**	**3,130**	**100%**

Source: City of St. Helens GIS data, FCS GROUP analysis.

Development Status

Before the deduction of environmental constraints, the residential land base has been classified by development status to estimate land that is "committed" and not likely to be developed for additional residential uses. These definitions include residential land that is developed, tax lots that exempt residential development, and public right-of-way[2], as described previously (results are summarized in **Exhibit 3.9**).

[2] Includes right-of-way that is defined as a tax lot in the GIS database, which exempts residential development. This includes most major existing right-of-way which is excluded from the buildable land base.

Exhibit 3.9: Residential Land Base before environmental constraints are applied, St. Helens UGB

Generalized Plan Designation	Acres on Vacant Taxlots	Acres on Part-Vacant Taxlots	Total Vacant & Part-Vacant Acres	Developed, non-residential and other constrained acres			
				Developed or Non-Res Land Base	Public/ Unbuildable	Undersized (less than 3,000 SF)	Total Committed Acres
Low-Density Residential	428	412	840	802	245	0.25	1,047
Medium-Density Residential	110	38	148	327	222	0.95	551
High-Density Residential	17	3	19	156	31	0.33	187
Commercial/Mixed Use	110	37	147	127	63	0.52	191
Total	**665**	**490**	**1,154**	**1,412**	**561**	**2**	**1,975**

Source: City of St. Helens GIS data, FCS GROUP analysis.

Buildable land after constraints

After allowing for future public facilities and future right-of-way, there are 804 net buildable acres. The buildable land inventory includes 570 acres with low-density plan designations, 93 acres with medium-density designations, 15 acres with high-density designations and 127 acres in commercial and mixed-use designations (see **Exhibit 3.10**).

As noted above, approximately 58% of the buildable land inventory is classified as vacant land and 42% is classified as partially vacant land.

Exhibit 3.10: Residential Land Base with all constraints, St. Helens UGB, 2019

Generalized Plan Designation	Total Acres	Committed Acres	Env. Constrained Acres	Buildable Acres	Less Future Public Facilities*	Net Buildable Acres
Low-Density Residential	1,887	1,047	81	760	190	570
Medium-Density Residential	698	551	24	124	31	93
High-Density Residential	206	187	5	15	-	15
Commercial/Mixed Use	338	191	20	127	-	127
Total	**3,130**	**1,975**	**129**	**1,025**	**221**	**804**

Source: City of St. Helens GIS data, FCS GROUP analysis.

* assumes 25% of buildable low and medium densitiy land area is utilized for future public facilities.

Commercial and Mixed-Use Land Assumptions

It should be noted that all vacant and part-vacant commercial and mixed-use land (127 acres in total) is included in the table above. This land was included because housing development is a permitted use (i.e. it is allowed) on land with commercial and mixed-use zoning. However, since most commercial and mixed-use zoned land area will be developed for non-residential use (e.g., retail, services, office, etc.), it is assumed that only 15% of the commercial and mixed-use land area will be developed as housing over the next 20 years. That assumption will be reflected in the "Residential BLI Results" section of this report below.

Redevelopment Areas

In accordance with OAR 660-024-0050, FCS GROUP also considered "redevelopable" lands, defined as follows by OAR 660-008-0005(7):

> "Redevelopable Land" means land zoned for residential use on which development has already occurred but on which, due to present or expected market forces, there exists the strong likelihood that existing development will be converted to more intensive residential uses during the planning period."

Given the unpredictable nature of real estate development, especially as it relates to residential redevelopment projects resulting in demolition and replacement of existing structures and development of net new housing units, the following broad-based methodology was used to estimate redevelopment potential in St. Helens:

- To comply with the redevelopment definition above, the St. Helens buildable land inventory includes an analysis of developed residential/commercial & mixed-use properties that have existing structures and are located within the St. Helens UGB.
- In order to sharpen the focus on land most likely to "be converted to more intensive residential use during the planning period", the redevelopment land inventory includes: tax lots with over 10,890 square feet (1/4 acre) of buildable land area; and tax lots with "land values" that are greater than "improvement values" based on current county assessor records. As a proxy for "present or expected market forces" which will drive redevelopment, these remaining properties were considered the universe of "redevelopable" lands.
- Like the analysis of vacant and part-vacant lands described in preceding sections, "redevelopable" lands were by low, medium, high density residential and commercial/mixed-use categories based on their underlying comprehensive plan and zoning classifications, and environmental constraints were removed to determine net buildable land area.
- Finally, this analysis assumes a rate of redevelopment which results in net new housing of the properties identified above. It is assumed that redevelopment will occur on 3% of properties in St. Helens. This factor was applied to the total universe of redevelopment land area to determine the net redevelopable land to be included in the St. Helens residential buildable land inventory (**Exhibit 3.11**).

Exhibit 3.11: Redevelopable Land Inventory, St. Helens UGB, 2019

Land Classification	Taxlots	Map Acres	Environmental Constraints	Net Lot Acres	Redevelopable Acres*
Low Density	318	256.0	6.3	249.7	7.5
Medium Density	77	27.3	1.1	26.2	0.8
High Density	37	22.6	0.6	22.0	0.7
Commercial and Mixed Use	51	30.7	0.2	30.4	0.9
Grand Total	**483**	**336.7**	**8.2**	**328.4**	**9.9**

Source: City of St. Helens GIS data, FCS GROUP analysis.

*Assumes a 3% redevelopment rate.

Summary of Residential Buildable Land Inventory

The combination of vacant, part-vacant and redevelopable land area for the residential and commercial/mixed use classifications results in the total St. Helens residential buildable land inventory.

As shown in **Exhibit 3.12, t**he sum of all categories provides 577.2 acres of low-density land (569.7 acres of vacant land and 7.5 acres of redevelopable land); 93.5 acres of medium-density land (92.7 acres of vacant and 0.8 acres of redevelopable land); and 15.5 acres of high-density land (14.9 acres of vacant and 0.7 acres of redevelopable land). The commercial and mixed-use land area expected for housing includes 19.2 acres (126.9 acres of vacant land plus 0.9 acres of redevelopment land multiplied by the 15% housing conversion factor). The sum of all categories provide 705.4 acres of buildable residential land within the St. Helens UGB.

Exhibit 3.12: Summary of Residential Buildable Land Inventory, St. Helens UGB, 2019

Land Classification	Vacant & Part Vacant	Redevelopable Land	Housing Development Factor*	Total Buildable Residential Land
Low Density	569.7	7.5	100%	577.2
Medium Density	92.7	0.8	100%	93.5
High Density	14.9	0.7	100%	15.5
Commercial and Mixed Use	126.9	0.9	15%	19.2
Grand Total	**804.1**	**9.9**	**-**	**705.4**

Source: derived from prior tables using City of St. Helens GIS data.

*Assumes a 15% housing redevelopment rate.

Exhibits 3.13 and 3.14 illustrate the buildable vacant and partially vacant buildable land areas for the residential and commercial/mixed-use land base within the St. Helens UGB.

Exhibit 3.13: Residential Land Base with all constraints, St. Helens UGB, 2019

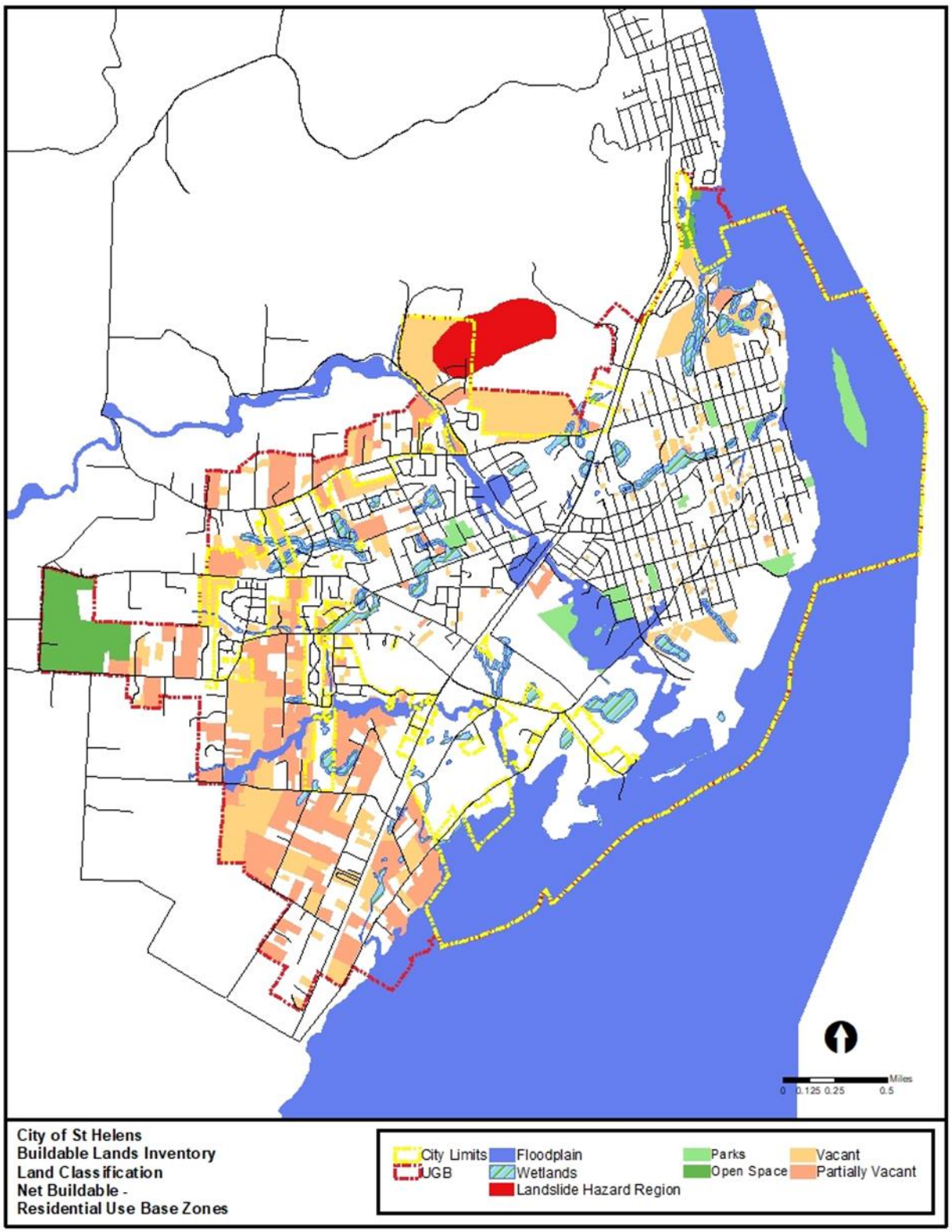
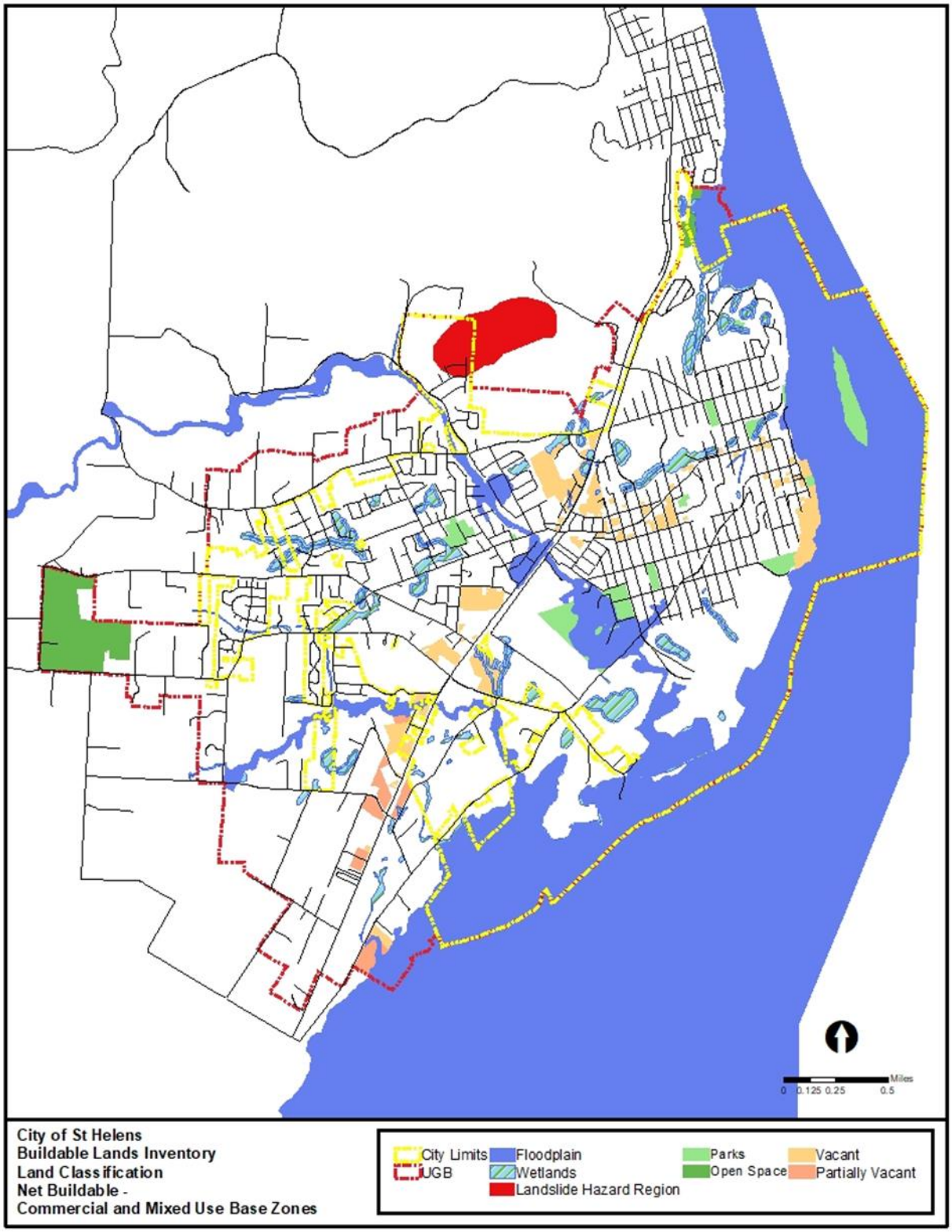


Exhibit 3.14: Commercial & Mixed-Use Land Base with all constraints, St. Helens UGB, 2019



Section IV. Land Needs Reconciliation

METHODOLOGY

The methodology for projecting housing needs within the St. Helens UGB takes into account 3 methods that are consistent with safe harbor provisions; and 2 methods that reflect the demographic and socio-economic trends, housing market characteristics and long-range population growth projections described in Task 2 (Housing Needs Forecast).

Findings from Task 3 (Buildable Land Analysis) are also utilized as a means of reconciling housing land demand with buildable land supply within the St. Helens UGB.

The steps taken to determine land needs using the safe harbor provisions include the following guidelines contained in OAR 660-024-0040(1)-(8).

Coordinated Population Growth Forecast

The land needs determination for a potential UGB expansion must be based upon the coordinated population growth forecast for the urban area as determined under rules in OAR-660-032. For this analysis, the 20-year planning period is 2019-2039.

As indicated in Appendix A Table 1, the population within the St. Helens UGB is projected to increase from 15,371 to 19,310, resulting in 3,617 net new residents by 2039.

Average Household Size

Relevant findings regarding specific requirements include:

> *(a) A local government may estimate persons per household for the 20-year planning period using the persons per household for the urban area indicated in the most current data for the urban area published by the U.S. Census Bureau.*
>
> **The most current estimate of persons per household is 2.68** per U.S. Census, American Community Survey: 2013-2017 estimates for the City of St. Helens.

Local Development Code Provisions

Relevant findings regarding specific requirements include:

> *(b) If a local government does not regulate government-assisted housing differently than other housing types, it is not required to estimate the need for government-assisted housing as a separate housing type.*
>
> **St. Helens does not regulate government assisted housing differently than other housing types.**

(c) If a local government allows manufactured homes on individual lots as a permitted use in all residential zones that allow 10 or fewer dwelling units per net buildable acre, it is not necessary to provide an estimate of the need for manufactured dwellings on individual lots.

St. Helens allows manufactured homes on individual lots as a permitted use in all residential zones that permit 10 or fewer dwelling units per net buildable acre, subject to development standards.

(d) If a local government allows manufactured dwelling parks required by ORS 197.475 to 197.490 in all areas planned and zoned for a residential density of six to 12 units per acre, a separate estimate of the need for manufactured dwelling parks is not required.

St. Helens allows manufactured dwelling parks only within areas zoned mobile home residential (MHR).

Housing Vacancy Rate Assumptions

(e) A local government outside of the Metro boundary may estimate its housing vacancy rate for the 20-year planning period using the vacancy rate in the most current data published by the U.S. Census Bureau for that urban area that includes the local government.

The most current estimate of overall housing vacancy in the City of St. Helens is 10.4% per U.S. Census, American Community Survey, 2013-2017 estimates (see Appendix A Table C).

Housing Land Needs Forecast Methods

There are three (3) types of safe harbor methods that are being considered for the determination of housing need for St. Helens which are consistent with OAR 660-024-0040(8), including

1. Safe Harbor Combined Housing Mix and Density Method
2. Safe Harbor Incremental Mix Method A
3. Safe Harbor Incremental Mix Method B

In addition, there are two additional methods that are consistent with the housing needs analysis developed during Task 2, and local development density assumptions that vary by land use and zoning type:

4. Localized Housing Density Method A
5. Localized Housing Density Method B

Additional details and findings are provided below.

SAFE HARBOR METHODS

Method 1. Combined Housing Mix and Density Method

This method is described in OAR 660-024-0040(8)(f) and "Table 1" from the rule (included in Appendix B). St. Helens is grouped into the category of cities with a future population of 10,001 to 25,000. As indicated in **Exhibit 4.1**, this method assumes 631 net new dwelling units, with a required mix as follows: 55% low-density, 25% medium-density, and 20% high-density.

This method requires an overall (citywide) minimum density within residential base zones of: 5 dwellings per net acre; 7 dwellings/acre for UGB analysis; and the city must allow at least 9 units per

acre overall (citywide) on its buildable residential land base. **This method results in a potential UGB residential land need of 208 net buildable acres.**

Exhibit 4.1

Method 1

Safe Harbor Combined Housing Mix and Density Method 1, Determination of Residential Land Need, St. Helen

		Factor	Finding	Units	Source Notes
1	20-Yr Population Growth Forecast:		19,310	population	Table A
2	Is Growth Forecast 10,001 to 25,000?	Yes			
3	20-Yr Population Change		3,617		Table A
4	Population in Group Quarters	2.5%	91	population	Table B
5	Population in Households		3,526	population	calculation
6	Average Household Size	2.68			Table B
7	Number of Households		1,316	households	calculation
8	Vacancy Factor	10.4%	137	population	Table C
9	Dwelling Units Added		1,453	dwellings	
10	Dwelling Mix Safe Harbor	Percent	Dwellings		
	Low Density Residential*	55%	799	dwellings	see OAR 660-024-0040(f)
	Medium Density Residential	25%	363	dwellings	see OAR 660-024-0040(f)
	High Density Residential	20%	291	dwellings	see OAR 660-024-0040(f)
	Total	**100%**	**1,453**	dwellings	calculation
11	Dwelling Unit Density Requirements	DU/Net Acre***	UGB Land Need Net Acres		
	Required overall minimum	5			see OAR 660-024-0040(f)
	Assume for UGB analysis	**7**	**208**	net acres	see OAR 660-024-0040(f)
	Zone to Allow	9			see OAR 660-024-0040(f)

* Includes mobile homes.

** Analysis consistent with OAR 60-024-0040(f).

*** This applies to all residential zones within City.

Method 2. Incremental Mix Method A

This method is described in OAR 660-024-0040(8)(h). St. Helens is grouped into the category of cities with a future population of 10,001 to 25,000. This method takes into account the existing overall housing density level of 3.6 dwellings per net acre, then factors that up by 25 percent, to 5.5 dwellings/acre for future housing development.

Applying safe harbor housing mix requirements as in Method 1, this method results in the same number of net new housing units as described in Method 1, but at a lower overall housing density (5.5 dwellings per acre). The city would still need to zone to allow at least 9 units per acre overall (citywide) on its buildable residential land base. **This method results in a potential overall UGB residential land need of 266 net buildable acres (see Exhibit 4.2).**

Exhibit 4.2

Method 2

Safe Harbor Incremental Mix Method 2, Determination of Residential Land Need, St. Helens UGB

						Source Notes
1	Existing Percentage of Density of Developed Land	Existing Dwellings	Existing Mix	Developed Acres***	Current DUs Per Acre	
	Low Density Residential*	3,792	71%			Table C
	Medium Density Residential	902	17%			Table C
	High Density Residential	622	12%			Table C
	Total	5,316	100%	**1,218**	**4.4**	BLI
2	Increase Overall Density as follows:	Increase Mix by:			New Overall Density	
	Average Increase	25%			**5.5**	see OAR 660-024-0040(h)
3	Planned Percentage of Housing Mix	Percent	Dwellings			
	Low Density Residential*	55%	799	dwellings		see OAR 660-024-0040(f)
	Medium Density Residential	25%	363	dwellings		see OAR 660-024-0040(f)
	High Density Residential	20%	291	dwellings		see OAR 660-024-0040(f)
	Total	100%	**1,453**	dwellings		calculation
						calculation
4	Zone to allow new housing mix	New Dwellings	Zone to Allow ***	UGB Assumption	Max UGB Land Need (Net Acres)	
	Low Density Residential*	799	4.0			
	Medium Density Residential	363	7.0			
	High Density Residential	291	16.0			
	Total/Average	**1,453**	**9.0**	**5.5**	**266**	see OAR 660-024-0040(h)

* Includes mobile homes. -

** Analysis consistent with OAR 60-024-0040(h).

*** This applies to all residential zones within City.

Method 3. Incremental Mix Method B

This method is described in OAR 660-024-0040(8)(i) and "Table 3" from the rule (provided in **Appendix C** for reference). St. Helens is grouped into the category of cities with a future population of 10,001 to 25,000. This method takes into account the existing housing mix by residential type (low, medium and high density), and then factors up the mix of medium density housing by 10 percentage points, and high density housing up by 5 percentage points to arrive at a future planned housing mix. This results in a planned housing mix for St. Helens as follows: 56% low density, 27% medium density, and 17% high density. This would result in a higher number of low density dwellings and a lower number of high density dwellings than would be planned under the two prior methods.

Applying safe harbor housing density requirements reflected in **Appendix B & C**, this method requires 7 units per acre overall, and the city would still need to zone to allow at least 9 units per acre overall (citywide) on its buildable residential land base. **This method results in an overall UGB residential land need of 370 net buildable acres (see Exhibit 4.3).**

Exhibit 4.3

Method 3

Safe Harbor Incremental Mix Method 3, Determination of Residential Land Need, St. Helens UGB

						Source Notes
1	Existing Percentage of Density of Deve	Existing Dwellings	Existing Mix	Developed Acres***	Current DUs Per Acre	
	Low Density Residential*	3,792	71%			Table C
	Medium Density Residential	902	17%			Table C
	High Density Residential	622	12%			Table C
	Total	5,316	100%	**1,218**	4.4	BLI
2	Increase Percentage of Density as follo	Increase Mix by:	New Mix			
	Low Density Residential*		56%			see OAR 660-024-0040(i)
	Medium Density Residential	10%	27%			see OAR 660-024-0040(i)
	High Density Residential	5%	17%			see OAR 660-024-0040(i)
	Total		100%			calculation
3	Zone to allow new housing mix	Net New Dwellings	Zone to Allow***	UGB Assumption	Max UGB Land Need (Net Acres)	
	Low Density Residential*	818	4.0	3.0	**273**	see OAR 660-024-0040(i)
	Medium Density Residential	392	7.0	5.0	**78**	see OAR 660-024-0040(i)
	High Density Residential	243	16.0	13.0	**19**	see OAR 660-024-0040(i)
	Total/Average	**1,453**	**9.0**	**7.0**	**370**	see OAR 660-024-0040(i)

* includes mobile homes.
** Analysis consistent with OAR 60-024-0040(i).
*** This applies to all residential zones within City.

LOCAL DENSITY AND HOUSING MIX METHODS

In addition to the safe harbor methods for determining residential land needs, two additional methods have been included that forecast the UGB land need based on the local housing market trends and local experience regarding development density.

Method 4. Local Market Demand and Density Forecast A

This method evaluates the land needs based on the projected housing needs described in Task 2, which reflect the future baseline housing demand for dwellings and families living in group quarters (shared living arrangements). This method is consistent with Oregon Administrative Rules for projecting land needs takes into account the expected average development density levels using estimates provided by city planning staff based on local experience. **This method results in 5.0 units per acre for new housing, and an overall UGB residential land need of 298 net buildable acres** (see **Exhibit 4.4**).

Exhibit 4.4

Method 4

Local Mix and Density Method, Determination of Residential Land Need, St. Helens UGB

					Source Notes
1	Future Housing Need	Net New Dwellings Expected	Planned Mix		
	Low Density Residential*	959	65%		Table D
	Medium Density Residential**	283	19%		Table D
	High Density Residential, baseline	183	12%		Table D
	Manufactured Housing	46	3%		Table D
	Total	1,470	100%		
2	Expected Housing Density	DUs per acre***	UGB Land Need (Net Acres)		
	Low Density Residential*	4.0	240		calculation
	Medium Density Residential**	7.0	40		calculation
	High Density Residential, baseline	14.0	13		calculation
	Manufactured Housing	10.0	5		
	Total/Average	**4.9**	**298**		calculation

* Includes detached units and mobile homes. ** Includes townhomes, plexes and group quarters.

*** Density estimates derived from Appendix D.

Source: compiled by FCS GROUP.

Method 5. Local Market Demand and Density Forecast B

This method for projecting land needs takes into account baseline housing growth (described in Method 4) plus a portion of pent-up housing demand. In addition to the 1,470 dwellings required to meet the baseline forecast, it is assumed that the market potential also exists to address pent up demand for market rate and government subsidized rental housing. Assumptions regarding current gaps in rental housing inventories are shown in **Appendix A, Table D**. For analysis purposes, it is assumed that 75% of the pent-up demand for market-rate apartments (40 units) and 33% of the pent-up demand for government subsidized housing (111 units) are provided over the next 20 years.

This method results in 5.3 units per acre for new housing, and an overall UGB residential land need of 309 net buildable acres (see Exhibit 4.5).

It should be noted that Method 5 is a departure from Oregon Administrative Rules thus it would likely result in a population growth forecast that exceeds the baseline 20-year population forecast. As such, Method 5 cannot be used for justification of a UGB expansion (if one is to be considered at this time).

Exhibit 4.5

Method 5

Local Mix and Density Method, Determination of Residential Land Need, St. Helens UGB

					Source Notes
1	Future Housing Need	Dwellings Expected	Planned Mix		
	Low Density Residential*	959	59%		Table D
	Medium Density Residential**	283	17%		Table D
	High Density Residential, baseline	183	11%		Table D
	High Density Residential, pent-up	150	9%		Table E
	Manufactured Housing	46	3%		Table D
	Total	1,621	100%		
2	Expected Housing Density	DUs per acre***	UGB Land Need (Net Acres)		
	Low Density Residential*	4.0	240		calculation
	Medium Density Residential**	7.0	40		calculation
	High Density Residential, baseline	14.0	13		calculation
	High Density Residential, pent-up	14.0	11		calculation
	Manufactured Housing	10.0	5		
	Total/Average	**5.3**	**309**		calculation

* Includes detached units and mobile homes. ** Includes townhomes, plexes and group quarters.

*** Density assumptions derived from Appenidx D.

Source: compiled by FCS GROUP.

RECONCILIATION OF RESIDENTIAL LAND NEED/SUPPLY

The reconciliation of UGB residential land need and land supply is summarized in **Exhibit 4.6.** The results indicate that the current buildable residential land supply within the St. Helens UGB (705 net acres within residential and commercial zones) is sufficient for addressing the overall 20-year land needs for housing under Methods 1-5.

Methods 3 and 5, however, would result in a greater number of multifamily apartments than the other methods, which in turn could require more land zoned for high-density development.

The ability for the City of St. Helens to provide an adequate land supply to address Methods 3 or 5 would require utilization of 100% of the vacant high density residential land and some portion (up to 8 acres) of the land zoned for commercial and mixed use to be utilized for apartments. New land use policies should be considered to encourage additional apartment development on commercial sites to address the housing demand associated with Methods 3 or 5.

It is recommended that the City of St. Helens pursue Method 5 as part of the Housing Needs Analysis and consider new policy measures aimed at encouraging apartment development on selected areas zoned commercial or mixed use. Potential policy measures are identified and discussed during Task 4 of the Housing Needs Analysis.

Exhibit 4.6

	Method 1	Method 2	Method 3	Method 4	Method 5
Dwellings/Units					
Low Density*	799	799	818	959	959
Medium Density**	363	363	392	283	283
High Density	291	291	243	183	333
Manufactured Dwelling Units				46	46
Total	**1,453**	**1,453**	**1,453**	**1,470**	**1,621**
Land Need (net acres)					
Low Density*			205	240	240
Medium Density**			56	40	40
High Density			15	13	24
Manufactured Home Parks				5	5
Total	**208**	**294**	**276**	**298**	**309**
Buildable Land Inventory (net acres)					
Low Density	532	532	532	532	532
Medium Density	93	93	93	93	93
High Density	16	16	16	16	16
Manufactured Home Parks	45	45	45	45	45
Commercial/Mixed Use***	19	19	19	19	19
Total	**705**	**705**	**705**	**705**	**705**
UGB Land Surplus/Deficit (net acres)					
Low Density*	-	-	328	293	293
Medium Density**	-	-	38	53	53
High Density	-	-	0	2	(8)
Manufactured Home Parks	-	-	45	40	40
Commercial/Mixed Use	-	-	19	19	19
Total	**498**	**412**	**430**	**408**	**397**
Adequacy of UGB to meet housing need	adequate	adequate	adequate	adequate	adequate

* Includes detached units and mobile homes. ** Includes townhomes, plexes and group quarters.

*** reflects 3% of total potential redevelopment properties, per St. Helens Buildable Land Inventory, March 2019.

Source: FCS based on previous tables.

Appendix A

Table A

St. Helens Population & Housing: Baseline 20-Year Forecast

Population Forecasts

	2017	2020	2025	2030	2035
Columbia County	51,500	53,212	56,048	60,716	94,765
St. Helens UGB	15,371	15,839	16,757	18,641	18,359
Oregon	4,141,100	4,252,100	4,516,200	4,768,000	4,995,200

Source: Portland State University Population Research Center

Forecasts of Oregon's County Populations and Components of Change, 2010-2050.

Compiled by FCS Group. AGR = average annual growth rate.

	Estimate			Forecast	Proj. Change
	2017	2019	2030	2039	20 Years
St. Helens UGB	15,371	15,693	18,641	19,310	3,617
Columbia County	51,500	52,225	60,716	61,902	9,677

Source: Portland State University Population Research Center; interpolated by FCS GROUP.

Forecasts of Oregon's County Populations and Components of Change, 2017-2068.

Compiled by FCS Group. AGR = average annual growth rate.

Table B

Demographics, St. Helens and Columbia County, 2013-2017

	St. Helens	Columbia County
Total population	13,169	49,645
Group quarters population	332	428
share of population in group quarters	2.5%	0.9%
Total households	4,798	18,941
Average household size	2.68	2.60

Source: 2013-2017 American Community Survey (Tables DP04, DP03, DP05, S1101 & B26001)

Table C

City of St. Helens Housing Inventory (2012 - 2017)

	2012 ACS	2017 ACS
Owner Occupied	3,490	3,318
Renter Occupied	2,595	2,739
Vacant	484	706
Total	**6,569**	**6,763**
Owner Occupied %	57.4%	54.8%
Renter Occupied %	42.6%	45.2%
Total	**100.0%**	**100.0%**
Vacant Dwellings %	7.4%	10.4%
Single-Family Detached	3,780	3,645
Townhome/Plexes	727	902
Multifamily	440	622
Mobile Home	176	147
Total	**5,123**	**5,316**

Source: U.S. Census Bureau, and American Community Survey

2013 to 2017 (Tables DP04, B25077 and B25064).

Table C

20-year Dwelling Unit Demand, Baseline Forecast, St. Helens UGB

	Owner-Occupied Dwelling Units	Renter-Occupied Dwelling Units	Vacant Units	All Dwelling Units	Projected 20-year Change (Units)
Housing Tenure Distribution:	**55.1%**	**36.7%**	**8.2%**	**100.0%**	**1,433**
Housing Unit/Type Distribution					
Single Family Detached	92%	30%	67%	67%	959
Townhomes / Plexes	3%	38%	17%	17%	245
Multi family (5+ units)	0%	32%	13%	13%	183
Mfg. home/other	5%	1%	3%	3%	46
Total Housing Units	**100%**	**100%**	**100%**	**100%**	**1,433**
Group quarters (single room occupancy)					**37**
Grand Total					**1,470**

Source: St. Helens Housing Needs Forecast Memorandum, FCS GROUP

Table D

St. Helens Rental Housing Gap Analysis, 2017

Income Range	Affordable Monthly Rent Costs *	Renter-Occupied Households	Estimated Available Rental Units	Gap or Surplus	Pent Up Demand		Capture Rate for Analysis	Pent Up Housing Demand
$75,000 or more:	$1,875	153	124	(29)	(53)	market rate gap	75%	40
$50,000 to $74,999:	$1,250-$1,875	232	208	(24)				
$35,000 to $49,999:	$875-$1,250	370	571	201				
$20,000 to $34,999:	$500-$875	562	793	231				
Less than $20,000:	Less than $500	529	212	(317)	(335)	subsidized housing	33%	111
Zero or negative income	Requires Subsidy	61	43	(18)				
Total		**1,907**	**1,950**	**43**	(388)			**150**

Source: St. Helens Housing Needs Forecast Memorandum, FCS GROUP

* Calculated as 30% of income range based on HUD guidelines

Appendix B

Table 1: Housing Mix/Density Safe Harbors

A. Coordinated 20-Year Population Forecast	B. Housing Density Safe Harbor Numbers are in Dwelling Units (DU) per net buildable acre	C. Housing Mix Safe Harbor (Percentage of DU that Must be *Allowed* by zoning)		
		Low Density Residential	Medium Density Residential	High Density Residential
Less than 2,500	• Required Overall Minimum: 3 • Assume for UGB Analysis: 4 • Zone to Allow: 6	70%	20%	10%
2,501 – 10,000	• Required Overall Minimum: 4 • Assume for UGB Analysis: 6 • Zone to Allow: 8	60%	20%	20%
10,001 – 25,000	• Required Overall Minimum: 5 • Assume for UGB Analysis: 7 • Zone to Allow: 9	55%	25%	20%
More than 25,000 but not subject to ORS 197.296	• Required Overall Minimum: 6 • Assume for UGB Analysis: 8 • Zone to Allow: 10	50%	25%	25%

- **Low Density Residential**: A residential zone that *allows* detached single family and manufactured homes and other needed housing types on individual lots in the density range of 2-6 units per net buildable acre (DU/NBA). The specified mix percentage is a maximum; a local government may allow a lower percentage.
- **Medium Density Residential:** A residential zone that *allows* attached single family housing, manufactured dwelling parks and other needed housing types in the density range of 6-12 units per net buildable acre. The specified mix percentage is a minimum; a local government may allow a higher percentage.
- **High Density Residential:** A residential zone that *allows* multiple family housing and other needed housing types in the density range of 12-40 units per net buildable acre. The specified mix percentage is a minimum; a local government may allow a higher percentage.
- **More than 25,000 but not subject to ORS 197.296:** The current population estimate for the city is less than 25,000 but the 20-year population forecast for the UGB is 25,000 or more. This safe harbor is not available for a jurisdiction subject to ORS 197.296 at the time of a UGB amendment.

Appendix C

Table 3: Methodology to Calculate Housing Mix for the "Incremental Housing Mix Safe Harbor" in OAR 660-024-0040(8)(i)

Example 1: The developed housing mix in the UGB currently consists of 93% Low Density, 6% Medium Density and 1% High Density.

Step 1: 5% + 1% = 6% High Density Residential

Step 2: 10% + 6% = 16% Medium Density Residential

Step 3: Total for Medium and High Density: 6% + 16% = 22% Medium and High Density Residential*

Step 4: 100% - 22% = 78% Low Density Residential

Under the Alternative Housing Mix **safe harbor** in OAR 660-024-0040(8)(i), buildable land in the UGB must be Zoned to Allow:

Safe Harbor Housing Mix = 78% Low Density, 16% Medium Density and 6% High Density.

Example 2: The developed housing mix in the UGB currently consists of 91% Low Density, 9% Medium Density and 0% High Density

Step 1: 5% + 0% = 5% High Density Residential

Step 2: 10% + 9% = 19% Medium Density Residential

Step 3: Total for Medium and High Density: 5% + 19% = 24% Medium and High Density Residential*

Step 4: 100% - 24% = 76% Low Density Residential

Under the Alternative Housing Mix **Safe Harbor** in OAR 660-024-0040(8)(i), buildable land in the UGB must be Zoned to Allow:

Safe Harbor Housing Mix = 76% Low Density, 19% % Medium Density and 5% High Density.

* If current housing mix has two tiers instead of three (for example, Low Density Residential and Medium-High Density, or Single-Family and Multi-Family), apply the "Low Density Residential" safe harbor percentage for Low Density Residential or Single-Family, and apply the combined "Medium Density" and "High Density" safe harbor percentages of 10% and 5%, or 15%, to Medium-High Density or Multi-Family.

Appendix D

St. Helens Land Use Plan Designations and Allowable Development Assumptions						
Generalized Plan Designation	City Zoning	UGB		Dwelling Units/Acre	Min Density (DU/acre)	Max Density (DU/ acre)
Low	R-10		Suburban Residential	Min lot size: SFD 10,000 sq ft	n/a	3.5
Low	R-7	SR, RSUR	Moderate Residential	Minlot size: SFD 7,000 sq ft, Duplex 10,000 sq ft	n/a	7.0
Med	R-5	GR, UGR, MHR,	General Residential	Min lot size: SFD 5,000 sq ft, SFA 2,500 sq ft, Duplex 5,800 sq ft, Multi 5,800 sq ft for first two	n/a	14.5
Med	MHR	UMHR	Mobile Home Residential	Same as R5	n/a	14.5
High	AR	UMFR	Apartment Residential	Min lot size: SFD 3,050 sq ft, SFA 1,600 sq ft, Duplex 5,000 sq ft, Multi 5,000 sq ft for first two units + 1,500 sq ft for each unit above two	n/a	23.4
Comm/Mixed	MU		Mixed Use	See notes	n/a	23.4
Comm/Mixed	GC		General Commercial	See notes	n/a	23.4
Comm/Mixed	RD:Ma	GC, UGC,	Riverfront District: Marina	See notes	n/a	23.4
Comm/Mixed	RD:P	HC, UHC	Riverfront District: Plaza	Units based on ea. 500 sq ft of non-residential	n/a	n/a
Comm/Mixed	RD: Mi		Riverfront District: Mill	No maximum density	n/a	n/a
Comm/Mixed	HBD		Houlton Business District	See notes	n/a	23.4
Comm/Mixed	HC		Highway Commercial	No density listed in HC zone	n/a	n/a
	Key					
	P = Permitted					
	PS = Permitted With Standards					
	C = Conditional					
	N = Not Permitted					

Generalized Plan Designation	City Zoning	UGB	Notes
Low	R-10	SR, RSUR	Structures and buildings shall not occuppy more than 35% of lot area
Low	R-7		Structures and buildings shall not occuppy more than 35% of lot area
Med	R-5	GR, UGR, MHR, UMHR	Buildings and structures shall not occupy more than 35 percent of the lot area except for single attached and multidwelling units, which can be
Med	MHR		Same standards as R5, except for Manufactured Home Parks. Only zone that allows MH Parks.
High	AR	UMFR	Buildings and structures shall not occupy more than 50 percent of the lot area
Comm/Mixed	MU	GC, UGC, HC, UHC	SFD, SFA and Plexes require R5 standards; Multi requires AR standards
Comm/Mixed	GC		Multi requires AR standards
Comm/Mixed	RD:Ma		Multi requires AR standards; units abover permitted uses are P
Comm/Mixed	RD:P		No ground level residential use; SFD and associated ADUs possible for official histooric structures
Comm/Mixed	RD: Mi		There is no minimum lot size requirement. Lots or parcels shall be of sufficient size to accommodate all applicable development standards for intended or potential land uses.
Comm/Mixed	HBD		SFD, SFA and Plexes require R5 standards; Multi requires AR standards
Comm/Mixed	HC		Maximum lot coverage including all impervious surfaces shall be 90 percent. Dwellings only allowed above ground floor.

Section V. Advisory Committee and Public Input

The St. Helens Housing Needs Analysis included opportunities for participation throughout the planning process.

The community participation process is designed to meet the following objectives:

- Provide a forum to share, develop and refine useful information and data.
- Ensure a shared understanding of current conditions, issues, concerns and opportunities.
- Provide avenues for the public, applicable committees, and supporting agencies to be involved.
- Build support for eventual adoption and implementation.

Public and Stakeholder Engagement Activities

Project Advisory Committee

The HNA Project Advisory Committee (PAC) for the St. Helens HNA included the City Planning Commission.

The PAC was charged with providing recommendations on key project issues and decisions, helping shape policy options, guiding stakeholder and community engagement strategies, acting as liaisons to specific constituencies or groups, hosting public events and encouraging community members to participate in the process. The PAC met (3) times during the course of the project.

During each meeting the HNA consultant presented and discussed interim findings, and received input and direction from the PAC and the public.

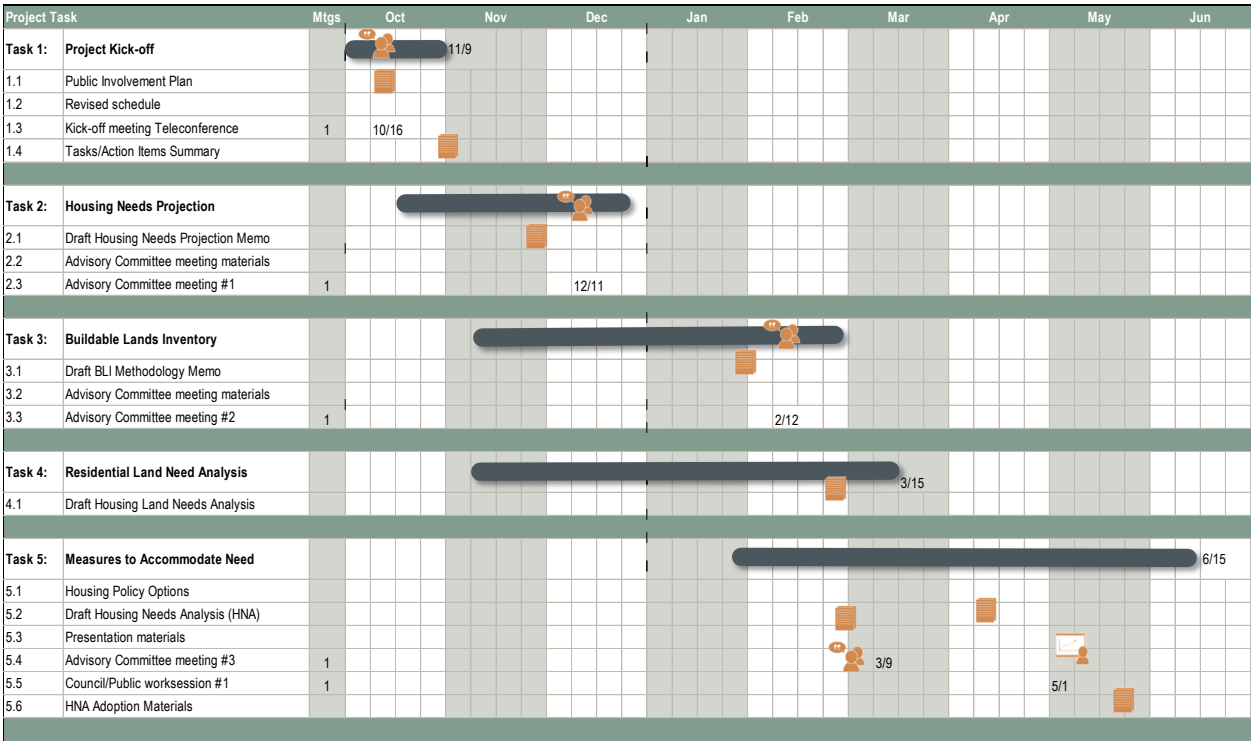
HNA PAC/Planning Commission meetings were open to the public and were promoted with an ad in local newspapers, social media posts, and a press release sent to media outlets in the area.

The overall HNA planning process and work schedule is shown below.

City Council and Public Meeting

The HNA will also be discussed with the St. Helens City Council in a meeting open to the public.

St. Helens Housing Needs Analysis, Project Schedule



ADVISORY COMMITTEE MEETING NO. 1

Meeting Notes

The initial St. Helens Housing Needs Analysis (HNA) Advisory Committee (AC) meeting was held on December 12 at the City of St. Helens, City Hall Council Chambers at 6 p.m. The meeting agenda, meeting sign-in sheet and Powerpoint presentation are attached, and an audio recording of this meeting is on file at the City of St. Helens.

- City Planner Jacob Graichen provided a brief introduction of the HNA and House Bill 4006 process. He informed the attendees that the study is being funded by Oregon Department of Land Conservation and Development (DLCD) in part because the current level of severely rent burdened households in the City.
- Todd Chase, FCS GROUP provided a summary of the overall project schedule, list of tasks/action items, and project background. Todd noted that the St. Helens Planning Commission would be acting as the Advisory Committee for the HNA process.
- Tim Wood, FCS GROUP summarized the findings from the Task 2 Housing Needs Projections using supporting tabular materials from the Task 2 memorandum and Powerpoint presentation.
- Todd noted that the draft baseline housing needs forecast summarized in the December 10, 2018 Memorandum assumes the need for 1,398 net new housing units (plus additional group quarters housing to house approximately 92 people) over the next 20 years.
- Todd noted that additional housing need forecast scenarios could be developed to take into account pent up demand or local objectives to support targeted development types (such as apartments or manufactured housing parks). Such scenarios should be included as part of the Task 4 Residential Land Needs forecast discussion.

Advisory Committee Discussion for the HNA

Todd requested input or questions from the Housing Advisory Committee:

- Chair Hubbard asked why townhomes and plexes were considered separately from multifamily dwelling units. Todd responded that the U.S. Census separates housing by type in part because the structural and building/fire code requirements for single family attached units (2 to 4 units per structure) is different than for multifamily units with 5 or more units per structure; and that both types of housing appeal to different households at varying price and density levels.
- Commissioner Stenberg commented that there are few options for senior housing in St. Helens and requested that FCS GROUP keep that in mind as they go forward in the analysis. Todd commented that there could be a housing scenario where additional senior housing developments are added to the baseline scenario.

Public Input for the HNA

Todd Chase requested input or questions from the public about the HNA; and Jennifer Dimsho added that members of the public that do not wish to speak can fill out a comment card if they so choose. A summary of public input received included:

- Rudy Johnson (local resident) noted that she has observed over time that good paying jobs have been replaced by low paying service jobs in the local area, and that may be a reason why income levels are low and poverty rates are high in St. Helens. She also indicated that low income apartment rents doubled after remodels. Councilor Ginny Carlson noted that some workforce housing/apartments were converted to (Northwest Oregon Housing Authority (NOHA) affordable housing, which bumped rents up to the minimum NOHA rates, citing rent increases from $890 to $1,290 for same size units.
- Michelle Brooks (local resident) asked about the ability of the HNA to address "tiny homes." Graichen responded by indicating that the City is considering a new provision in the zoning code that would allow "cottage homes" and that the City is committed to accommodating a wide variety of housing. Graichen also noted that the City recently adopted a new Auxiliary Dwelling Unit (ADU) provision that makes providing ADUs easier than in the past.
- Rich Bailey (local builder and contractor) commented about the high cost of housing construction. He indicated that a combination of increasing construction costs, permitting costs, fees, SDCs and unique environmental factors (i.e., hard rock, wetlands) are driving up the cost of creating buildable lots in the City to about $200,000 or more per lot. Bailey requested that the City utilize this process to consider ways to lower development costs, such as revising wetland mitigation requirements, changing zoning to allow more townhomes, and lowering or deferring or waiving SDCs for affordable housing developments. Bailey also indicated that the availability of vacant buildable lots is scarce in the City once you take into account development constraints.
- Shauna Stroup-Harrison(local resident and realtor) expressed concern over the demand now created by "Portland residents" that are moving to exurbs like St. Helens in search of more affordable single family housing. She noted that the state's requirement to accommodate 20 years of housing demand will result in thousands of people moving to St. Helens and that would lead to reduced quality of life for everyone here as it would place significant demand on scarce resources. She indicated that grocery stores and CC Rider transit service, in particular, is inadequate. She asked if the City-owned Millard Road property would be considered in the HNA. Graichen said this process will help inform the future zoning of the property.
- Associate Planner Jenny Dimsho noted that there were comment cards near the sign in sheet if anyone preferred to provide written testimony.

Next Steps for the HNA

Todd indicated that this input will help the project team refine the draft baseline housing needs forecast scenario. At the next scheduled HNA Advisory Committee meeting on February 12, FCS GROUP will present the draft Buildable Land Inventory (Task 3) and begin to compare that with the draft Residential Land Needs findings (Task 4).

HB 4006 Public Input

With the Planning Commission comments and public input addressed, the meeting transitioned into the HB 4006 meeting (opened by the Chair Russell Hubbard at 6:37 p.m.) regarding the causes and consequences of severe rent burdens within the City, the barrier to reducing rent burdens, and possible solutions. In addition to the issues noted above, this portion of the meeting provided opportunity for the public to share concerns and observations regarding severely rent burdened households. Comments proceeded as follows:

- Julia Jackson, Executive Director of Columbia Community Mental Health reported that since April 2017, there have been 206 clients that reported being transient or homeless. There are currently 150 clients that are transient or homeless in the local area. She noted that there are certainly more because they may be living with family and/or do not consider themselves homeless. She said 16 temporary housing shelter units are being constructed by Community Action Team, which will help, but does not come close to addressing the extent of the problem. She suggested that her organization would like to work with the City and other partners to provide transitional housing for those experiencing mental health issues. She noted that her organization has data to help understand the landscape of the mental health issues facing Columbia County and St. Helens, and that her organization owns land that could be developed for transitional/homeless and/or special needs housing. They are working on securing funding and will be meeting with Oregon Behavioral Health to discuss partnering.

In addition to the in-person public comments received at the public open house, one comment was received via email (Exhibit A) and is hereby made part of the public record.

With no additional public comments received, the HB 4006 public meeting was adjourned at 6:47 p.m.

ADVISORY COMMITTEE MEETING NO. 2

The second St. Helens Housing Needs Analysis (HNA) Advisory Committee (AC) meeting was held on February 12, 2019 at City Hall at 6 p.m. A meeting attendance list and the Buildable Lands Inventory (BLI) Report and Presentation are on file with the City and uploaded to the Project Website.

Buildable Land Inventory Methodology Overview:

- Todd Chase provided summary of prior meeting (Task 2 Housing Needs Forecast) and HNA project overview.
- Tim Wood provided a BLI Presentation and an updated BLI Report. Tim noted overall findings that have not changed significantly from the prior draft, but the current report is intended to provide additional detail about the BLI requirements per Oregon Administrative Rules (OARs) and respond to city and Department of Land Conservation & Development (DLCD) staff comments received to date.
- The HNA AC indicated that they understood the BLI methodology and generally agreed with its findings. Commissioner Cohen asked if there is an ideal number of acres a City should have available for housing. He wondered if 700 acres of buildable land was too much or too little. Todd Chase said it depends on how quickly the City grows. If the City grows faster than it has in the past, then more land may be needed to accommodate needed housing. This HNA exercise should be repeated every ten years or so to see if the City is growing as expected.
- Commissioner Semling asked how far south the Urban Growth Boundary goes.
- There was a discussion about some of the larger parcels of vacant land identified on the BLI map.
- City staff noted that there may be subdivisions (i.e., Graystone Estates) that are now in predevelopment phases and asked whether they should be included in the BLI as vacant land. Todd recommended that all vacant land that existed as of December31, 2018 should be included in the BLI since the forecast period includes 20 years (2019 to 2039) of growth.
- It was noted that the BLI does include the Riverfront property even though it is publicly owned because it is being planned for a mix of development which includes housing.
- City staff also noted that there are potentially one or two other properties that may need to be added to the BLI, which can be considered buildable residential land. City staff will provide FCS more details next week.
- City staff indicated there is a publicly-owned property (Millard Road property) that could be rezoned to accommodate housing in the future. It is currently zoned Public Lands. Todd and Tim recommended that the BLI be based on current zoning so if housing is prohibited that land would not typically be included in the BLI; however Todd noted redevelopment properties can be included in the BLI at the discretion of the City as long as they meet the BLI criteria and are not 100 percent constrained by the various factors included in the BLI

methodology. It was agreed to leave this property out of the BLI in order to help the City inform its re-zoning after the HNA is completed.

- No one from the audience testified about the BLI methodology presentation.
- The next HNA AC meeting is scheduled for March 12, 2019 at 6:00 p.m. before the regularly scheduled Planning Commission meeting in the Council Chambers. The agenda will focus on revised findings of Task 2 and Task 3 and reconciliation of St. Helens residential land demand and supply.

The meeting adjourned at 6:33 p.m.

ADVISORY COMMITTEE MEETING NO. 3

The third St. Helens Housing Needs Analysis (HNA) Planning Commission (PC) advisory committee and public meeting was held on March 12, 2019 at City Hall at 6 p.m. A meeting attendance list and the Buildable Lands Inventory (BLI) Report and Presentation are on file with the City and uploaded to the Project Website.

Land Need Reconciliation Overview

Tim Wood, Project Consultant with FCS GROUP introduced the Planning Commission to the Land Need Reconciliation Table which he explained is the key takeaway from the Task 4 Residential Land Need Analysis. Wood explained that there were 5 methods considered, each of which showed St. Helens had adequate residential land except for high-density land, which St. Helens needs more of. The public and planning commission had questions including the following:

- A member of the public asked if the projected dwelling unit need was reflective of a given timeframe. Wood clarified that it was meant to represent demand over a 20-year timeframe.
- A Commission member noted that the land supply numbers had changed since the last time FCS GROUP had reported to the Planning Commission. Wood noted that City Staff had identified tax lots and land use categories which were overlooked in the initial buildable land inventory. He stated that those lands were subsequently added, shifting buildable acre figures slightly.
- A Commission member asked whether the buildable land inventory had considered steep basalt as a constraint given that it is difficult and expensive to build on. Wood clarified that steep slopes over 25% have been removed from the buildable land inventory, but specific types of rock or geologic profiles (over and above that which is reflected in the 25% slope layer) were not included as land development constraints.
- A Commission member asked if infrastructure had been considered. The Buildable Land Inventory methodology assumes that adequate public facilities can be functionally provided over the next 20 years for roads, sewer, and water systems for the buildable vacant land inventory within the current Urban Growth Boundary.
- A Commission member asked whether it makes sense to analyze land based on its zoned density given bills being considered at the Legislature which might outlaw single family zoning. Wood said that FCS GROUP recommends that cities do not count on the speculative passage of new bills and carry on with the HNA process assuming no changes to state law.

Policy Consideration Overview:

The meeting transitioned to policy considerations that St. Helens might undertake to address some issues uncovered throughout the HNA process. The purpose of this discussion was to allow the Planning Commission to weigh in on whether the policies were feasible.

Minimum Density Standard

This policy would require builders to obtain a certain unit per acre standard when developing a parcel. Jacob Graichen pointed out that typically, builders do build as many units as they can because they want to produce as many units as they can sell. Commissioners were reluctant to comment because there was not a specific density standard proposed. Additionally, there was a preference by one commissioner to allow developers to determine market-based development densities.

Allowing Duplexes Outright

This policy suggestion was to allow duplexes by right in R-7 zoned land rather than being conditionally allowed as is current practice. Commissioners mostly voiced opposition to this policy consideration because it could be disruptive to neighborhood character and the current practice gives more oversight with regards to when a duplex is allowed. They observed that the current practice (allowing duplexes as a conditional use) works and that duplexes have been built under the existing regime.

Reduce Parking Requirements for Multifamily Development

This policy recommendation would have allowed conditional reductions in the provision of parking required for multifamily developments in St. Helens. The developer would be required to fund a parking study showing that the impacts of a reduction in parking provided on sight would be negligible. Commissioners mostly voiced opposition to this policy proposal given that parking is an issue that animates local politics already and to allow for less parking would make the situation worse. Additionally, they observed that St. Helens is more auto-dependent than many communities which adopt such policies. Some Commissioners voiced support for such a policy closer to downtown St. Helens or the Houlton Business District but that proposal did not garner further support from the broader commission.

Allow Cottage Clusters

This policy recommendation would call for St. Helens to draft and adopt rules allowing and regulating cottage clusters in the City. Essentially, these developments would consist of small homes on a single property. Commissioners had questions about specifics such as the average size of the homes and the density allowed for such developments. Mr. Graichen told Commissioners that specifics would be developed as the policy is written. Commissioners were broadly supportive of this recommendation.

Increase Allowable Density for Annexing Properties

Currently, properties annexing from unincorporated Columbia County into St. Helens must meet certain criteria to achieve higher density zoning upon annexation (such as R-5 and Apartment Residential). This policy recommendation calls for St. Helens to examine those standards and consider relaxing them to provide higher density housing on the periphery of the city. Commission members noted that the existing regime worked and did allow higher density for annexing properties but there should be some oversight to ensure that such density would not disrupt the character of the surrounding residential areas.

The meeting adjourned at 7pm.

PUBLIC INPUT: HABITAT FOR HUMANITY

Columbia County Habitat for Humanity®

March 29, 2019

TO: Jennifer Dimsho & Jacob Graichen, Planning Department, City of St. Helens; St. Helens Planning Commission; Mayor Rick Scholl and the St. Helens City Council

FROM: Jennifer Anderson, Executive Director, Columbia County Habitat for Humanity

RE: City of St. Helens Housing Needs Analysis

Thank you for the opportunity to provide input to your housing needs analysis. I attended the first and third public meetings. It was my intention to just gather information, but requests for input from Jennifer Dimsho and Ginny Carlson inspired this memo. I hope you will find this useful.

High Density Housing

Working directly with applicants for Habitat houses gives me a window into the struggles of low-income families. Statistics are helpful, but do not tell the whole story. You may have more high-density housing than you realize. It is very common to have multiple family units living in a single family dwelling. Most applicants for Habitat houses complain about overcrowding. These applicant statements are typical:

"I have three children and one grandchild living with us. I sleep on the couch and my husband sleeps on the floor."

"There are ten of us living in my grandmother's house. My family of five including the baby live in one bedroom. We have one bathroom and the septic system is not keeping up."

"My family sleeps on air mattresses in my parent's living room."

We have high density housing. The question is: "How can the city provide high-density housing that promotes human dignity."

Under-Utilized Housing

Another demographic we encounter through our home repair and ramp building efforts are elderly widows. Almost all of them are living in houses by themselves and cannot afford to move. They do not have the income, skill or physical capability to maintain the home. Most likely by the time they pass on, the home will be unsalvageable or in need of extensive rehabilitation causing it to remain on the market for a long time. Low cost senior housing is needed in St. Helens and could possibly free up some single family homes.

Cottage Clusters

I was very happy to hear the planning commission enthusiastic about cottage clusters. We would love to build a cottage cluster modeled on plans that have a common green space in the center and parking on the perimeter. It is a more efficient use of land and still has the feel and appeal of single family homes. An additional idea that may work well with this is a community land trust.

Community Land Trusts

I have attended several conferences with presentations given by Proud Ground. They manage Community Land Trust to preserve "permanent affordability." The idea is to sell houses without the cost of land included. When the homeowner sells the home they are required to sell to another low income person/family. The

seller retains a portion of the appreciated value and the rest goes back to the managing trust. The executive director of Proud Ground offed to come to St. Helens to give a presentation on community land trusts. Combining a community land trust with a cottage cluster would provide homeownership opportunities to very low income people.

Duplexes

Columbia County Habitat for Humanity supports the building of more duplexes. Replacing one higher priced unit with two more affordable homes seems like an obvious win. I was surprised the planning commission was reluctant to add more duplexes to the mix of housing for St. Helens. There is a trend toward smaller family units. There may be more of a need for duplexes in the future.

Mobile Home Parks

Mobile homes do provide a lower price point for people wanting to buy a home. However, mobile homes depreciate over time and therefore do not allow families to build wealth. Many mobile homes in the County are in poor condition with no gutters, leaking roofs, mold and rot. The disposal of these homes is very expensive leaving the family no choice but to patch up what they can. Mobile homes do not hold up well in this climate. I visited an owner of a mobile home in Clatskanie. The home had large holes in the siding with insulation actually falling out. The floor was sagging and it was obvious the home was a total loss. The cost of removal would have been close to $10,000.

Additional thoughts

At the housing needs analysis meetings, members of the planning commission when presented with a recommendation from the consultants agreed to "decide on a case-by-case basis." There may be some reluctance to alter code without knowing what the full impact of those decisions might be. From a developer standpoint, delays in construction cost money. Adding additional meetings, fees, etc. to the approval process will increase the cost and therefore the price of the homes.

The other side of the equation.

Since affordable housing is defined as a percentage of gross income, increasing area wages is also a tactic for addressing affordable housing. A strong tourism industry generates more service jobs that typically pay less than other types of employment. The Employment and Industry Growth Chart from OR Housing and Community Services Data sheet (attached) shows a 26 percent increase in lower paying "leisure, hospitality industry" jobs and a significant reduction in higher paying jobs in a variety of industries. In my position, I have the opportunity to network regularly with Executive Directors at other Habitat for Humanity affiliates in Oregon and Washington. It is noteworthy that there are real challenges to providing affordable housing in areas with strong tourism because of they tend to have higher property values and a large number of low-paying service jobs.

Thank you again for the opportunity to participate in this process.

In partnership,

Jennifer Anderson
Executive Director
Columbia County Habitat for Humanity

habitat@opusnet.com
503-366-1400 x2

Section VI. GLOSSARY

Accessory Dwelling Unit (ADU): A small living space located on the same lot as a single-family house.

Buildable Lands Inventory (BLI): An assessment of the capacity of land within the city's Urban Growth Boundary to accommodate forecasted housing and employment needs.

Buildable Residential Land: Includes land that is designated for residential development that is vacant and part-vacant and not constrained by existing buildings or environmental issues.

Constrained land: Land that is unavailable for future net new residential development based on one or more factors, such as environmental protections, public lands, floodplains, or steep slopes.

Cost Burdened: Defined by US Department of Housing and Urban Development (HUD) as households who spend over 30% of their income on housing.

Cottages: Small, single-level, detached units, often on their own lots and sometimes clustered around pockets of shared open space. A cottage is typically under 1,000 square feet in footprint.

Density: Defined by the number of housing units on one acre of land.

Development density: Expected number of dwelling units (per acre) based on current zoning designations.

Family: A group two or more people (one of whom is the householder) related by birth, marriage, or adoption and residing together.

High Density: Lots with the average density of 12+ dwelling units per acre. Best suited for multifamily housing such as apartments and condos.

Housing Needs Analysis (HNA): The Housing Needs Analysis consists of four distinct reports that analyze the state of housing supply, housing affordability issues and the City's ability to meet projected housing demand going into 2040.

Housing Unit (or Dwelling Unit): A house, an apartment or other group of rooms, or a single room is regarded as a housing unit when it is occupied or intended for occupancy as separate living quarters; that is, when the occupants do not live and eat with any other person in the structure and there is direct access from the outside or common hall.

Household: Consists of all people that occupy a housing unit.

HUD: Acronym for US Department of Housing and Urban Development, the federal agency dedicated to strengthening and supporting the housing market.

Low Density: Lots with the average density of 3-4 dwelling units per acre. Best suited for family housing such as single family detached homes.

Manufactured Housing: is a type of prefabricated home that is largely assembled of site and then transported to sites of use. The definition of the term in the United States is regulated by federal law (Code of Federal Regulations, 24 CFR 3280): "Manufactured homes are built as dwelling units of at least 320 square feet in size, usually with a permanent chassis to assure the initial and continued

transportability of the home. The requirement to have a wheeled chassis permanently attached differentiates "manufactured housing" from other types of prefabricated homes, such as modular homes.

Manufactured Home Park (or manufactured home park): a local zoning designation that is specifically intended to address demand for this housing type. OAR chapter 813, division 007 is adopted to implement section 9, chapter 816, Oregon Laws 2009, and sections 2, 3 and 4, chapter 619, Oregon Laws 2005, as amended by sections 10 to 12, chapter 816, Oregon Laws 2009, and sections 19, and 21, chapter 503, Oregon Laws 2011 for the purpose of regulating manufactured dwelling parks.

Median Family Income (MFI): The median sum of the income of all family members 15 years and older living in the household. Families are groups of two or more people (one of whom is the householder) related by birth, marriage, or adoption and residing together; all such people (including related subfamily members) are considered as members of one family.

Medium Density: Lots with the average density of 6-12 dwelling units per acre. Best suited for small lot housing such as single family attached, townhomes, plexes and cottages.

Mixed Use: Characterized as two or more residential, commercial, cultural, institutional, and/or industrial uses into one combined building or building(s) on the same parcel of land.

Multi-Family Housing: Stacked flats in a single buildings or groups of buildings on a single lot. Parking is shared, and entrance to units is typically accessed through a shared lobby.

Oregon Administrative Rules (OAR): Administrative Rules are created by most agencies and some boards and commissions to implement and interpret their statutory authority (ORS 183.310(9)). Agencies may adopt, amend, repeal or renumber rules, permanently or temporarily. Every OAR uses the same numbering sequence of a three-digit chapter number followed by a three-digit division number and a four-digit rule number. For example, Oregon Administrative Rules, chapter 166, division 500, rule 0020 is cited as OAR 166-500-0020. (oregon.gov)

Part-vacant land: Unconstrained land that has some existing development, but can be subdivided to allow for additional residential development.

Plexes and Apartments: Multiple units inside one structure on a single lot. Usually each unit has its own entry.

Seasonal dwellings: These units are intended by the owner to be occupied during only certain seasons of the year. They are not anyone's usual residence. A seasonal unit may be used in more than one season; for example, for both summer and winter sports. Published counts of seasonal units also include housing units held for occupancy by migratory farm workers. While not currently intended for year-round use, most seasonal units could be used year-round.

Severely Cost Burdened: Defined US Department of Housing and Urban Development (HUD) as households who spend over 50% of their income on housing.

Single Family Attached: Dwelling units that are duplexes without a subdividing property line between the two to four housing units. "Attached" duplexes require a single building permit for both dwelling units. The "attached" units would be addressed with one numerical street address for the overall structure with separate alpha-numeric unit numbers for each dwelling.

Single Family Detached: Free standing residential building**,** unattached, containing separate bathing, kitchen, sanitary, and sleeping facilities designed to be occupied by not more than one family, not including manufactured and mobile homes.

Townhome (also known as duplexes, rowhouse, etc.): Attached housing units, each on a separate lot, and each with its own entry from a public or shared street or common area.

Urban Growth Boundary (UGB): Under Oregon law, each of the state's cities and metropolitan areas has created an urban growth boundary around its perimeter – a land use planning line to control urban expansion onto farm and forest lands.

Vacant housing unit: A housing unit is vacant if no one is living in it at the time of enumeration, unless its occupants are only temporarily absent. Units temporarily occupied at the time of enumeration entirely by people who have a usual residence elsewhere are also classified as vacant.

Vacant land: Vacant and part-vacant land identified within the local buildable land inventory that is not developed and unconstrained for future planned residential development.