

TECHNICAL MEMORANDUM

Measures to Accommodate Needed Housing

City of Boardman, Oregon

TO: City of Boardman
FROM: Andrew Parish, AICP, and Megan Gryzbowski, MIG
RE: **DRAFT Measures to Accommodate Needed Housing**
DATE: September 15, 2026

Introduction

Purpose

This memorandum describes the measures the City of Boardman may choose to adopt in order to implement as the findings of the City's Housing Capacity Analysis (HCA) and reduce barriers to accommodate needed housing or promote infill development.

The City of Boardman HCA includes the following components:

- Housing Needs Allocation, provided by the State of Oregon's Department of Administrative Services (DAS)
- Residential Buildable Lands Inventory (BLI)
- Development-Ready Lands Inventory (DRLI)
- Residential Land Needs Assessment (RLNA)
- Measures to Accommodate Needed Housing (or Land Use Efficiency Measures, LUEM)

This memorandum provides a review of the City's Comprehensive Plan and Development Code to determine if there are opportunities for amendments in order to meet housing needs. Where relevant, it also includes a brief discussion of topics and conversations addressed by the City's Housing Advisory Committee (HAC), which cover several of these recommendations.

Regulatory Basis and Background

This report implements the requirements of ORS chapter 197A (Land Use Planning: Housing and Urbanization) and its OAR chapter 660.

1. ORS 197A.280 (Housing Capacity) – Requires cities outside of the Portland Metro area and below 25,000 in population to **determine their needed housing, inventory buildable land**

within the urban growth boundary, and take necessary actions under ORS 197A.100(3) to accommodate that need.

2. ORS 197A.018 (Needed Housing) – **Defines "needed housing"** to include detached single-family housing, the middle housing types described in ORS 197A.420, multifamily housing, government-assisted housing, manufactured dwelling parks and individual manufactured home lots, agricultural worker housing, accessible housing, housing for older persons, student housing where relevant, and single room occupancies.
3. ORS 197A.400 (Clear and Objective Approval Criteria) – Requires **clear and objective standards for housing approvals** within the UGB.
4. ORS 197A.420 (Middle Housing; Duplex Mandate) – Requires cities of 25,000 or greater, and cities/counties within a Metro service district, to allow all middle housing types wherever detached single-family dwellings are allowed. Cities outside a metro service district with population 2,500 to 25,000, Boardman's tier, **need only allow a duplex on each qualifying lot**; triplex, quadplex, cottage cluster, and townhouse remain a local choice rather than a state requirement.
5. ORS 197A.425 (Accessory Dwelling Units) – Requires cities of 2,500 or greater to allow at least **one (1) accessory dwelling unit (ADU)** per each detached single-family residence; and cannot require additional off-street parking as a condition of approval.

Housing Allocation

OHNA Allocation Methodology

The OHNA 2026 production targets for Boardman are derived through a multi-step statewide methodology administered by the Oregon Department of Administrative Services (DAS).¹ The OHNA 2026 production targets are summarized below:

Table 1. 20-Year Targets by AMI. OHNA 2026 Results Report, Figure 26, Northeast Region

	Total	0-30% AMI	31-60% AMI	61-80% AMI	81-120% AMI	>120% AMI
Boardman UGB	728	145	136	79	136	232

Housing Need by AMI Tier

Table 2 presents the estimated need for net new housing units by income segment.

¹ Current OHNA production targets were developed with population estimates that have since been amended. The 2027 population forecast will be based on these amended 2020 Census numbers resulting in a more accurate population forecast and OHNA production target.

Table 2. Boardman UGB – OHNA 2026 Production Targets by AMI Tier

Income Segment		Income Level (Rounded)	Owner Units	Renter Units	Total	Share	Common Housing Type
Upper	>120% AMI	>\$103K	199	33	232	32%	Single-detached homes; Townhomes; Condominiums; Luxury Apts.
Middle	80-120% AMI	\$69-103K	114	22	136	19%	Single-detached homes; Townhomes; Small homes; New apartments
Low	60-80% AMI	\$51-69K	60	19	79	11%	Market apartments; Manufactured homes; -plexes; Aging single-detached
Very Low	30-60% AMI	\$26-51K	61	75	136	19%	Aging/substandard rentals; Government-subsidized; Voucher
Extremely Low	<30% AMI	< \$26K	38	107	145	20%	Government-subsidized; Voucher; Shelter; Transitional
Total			473	255	728	100%	

Translation to Housing Type and Zoning

Unit need by AMI tier is translated into housing type and density or lot size assumptions appropriate to Boardman's market context and allocated to specific zoning designations, as shown in Tables 3 and 4.

Table 3. Unit type by AMI tier

	Single Detached	Single Attached	Multi-Family			Manuf. Home	Boat, RV, Other	Totals
			2-unit	3- or 4-plex	5+ unit MFR			
Ownership Housing	279	24	9	9	47	87	16	472
Rental Housing	43	11	40	7	140	15	-	256
Totals (#)	322	35	49	17	187	102	16	728
Totals (%)	44.2%	4.8%	6.8%	2.3%	25.7%	14.0%	2.3%	100%

Table 4. Comparison of Forecasted Need with Available Capacity (Within City Limits)

Zone & Plan Category		Supply		Demand		
		BLI – Unit Capacity	New Unit Need	Surplus or (Deficit)		
				Units	Avg. Units/acre	Acres
Low-Density	SF detached, some SF attached & 'plexes	4,115 (80%)	338	3,777	6	629

Med-Density	SF attached, manufactured, 2-4 'plexes	90 (2%)	203	(113)	12	(9)
High-Density	Multi-family apartments	950 (18%)	187	763	20	38
Totals	-	5,516	728	4,427	-	658

City staff have noted that the City of Boardman has faced significant growth pressure in recent years and expect a level of growth more than 2020 Census forecasts. With this perspective in mind, the following recommendations are aimed at promoting significant residential development within the City of Boardman that respond to these adjusted population estimates.

Boardman Comprehensive Plan

This City of Boardman is currently updating their Comprehensive Plan as part of a broader Strategic Plan and Housing Needs update. This review recommends updates to housing policy within the City's comprehensive plan with the intent of increasing housing supply and reducing or removing barriers to affordable housing development.

Adopted Comprehensive Plan

The current Comprehensive Plan was adopted in 2003, with the Housing Element (Chapter 10) featuring data and analyses from the later 1990's. Much has changed both in the City of Boardman and the broader regional and state-wide housing environment since that time.

Comprehensive Plan Update

The City's draft update of Comprehensive Plan contains 4 overarching chapters, as follows. Relevant draft goals and policies are included below, followed by recommendations from the HCA consultant team:

1. Chapter 1: People
2. Chapter 2: Development
3. Chapter 3: Services
4. Chapter 4: Nature

Chapter 1: People

This chapter reflects community engagement efforts that will incorporate the evolving and up-to-date housing needs of community members.

Goal 1.1: Establish and maintain a community engagement program that provides all Boardman residents with timely, accessible, and meaningful opportunities to participate in land use planning decisions.

Policy 1.1.5 The City shall maintain consistency between the Comprehensive Plan, the Development Code, and other implementing policies to ensure that decisions made through public processes are reflected in adopted regulations.

Policy 1.1.6 The City shall periodically review and update this Comprehensive Plan to ensure it remains consistent with state requirements, reflects current community priorities, and is grounded in current data and conditions.

Goal 1.2: Ensure that community engagement in land use planning is inclusive, culturally appropriate, and reflective of the full diversity of Boardman's population.

Policy 1.2.1 The City shall actively work to remove barriers to participation in land use planning, including language, work schedule, transportation, and unfamiliarity with planning processes.

Considerations: *No modifications recommended. Goals and policies identified support development of housing by aligning the development code with the Comprehensive Plan and supporting community understanding of the land use process.*

Chapter 2: Development

This chapter focuses on maintaining land capacity for housing and employment over the next 20-years.

Goals and Policies

Goal 2.1: Maintain an adequate supply of buildable residential land to meet the City's 20-year housing production target and accommodate the full range of needed housing types.

Policy 2.1.1 The City shall maintain a sufficient supply of buildable residential land within the UGB to meet the 20-year housing production target established by the Oregon Housing Needs Analysis (OHNA) program and shall monitor land supply annually against that target.

Policy 2.1.2 The City shall permit, through Development Code standards and zoning map designations, all needed housing types, including single-family detached homes, middle housing types (duplexes, triplexes, cottage clusters, and townhomes), multifamily apartments, manufactured homes, and government-assisted units.

Policy 2.1.3 The City shall coordinate residential land supply planning with infrastructure capacity, including water, sewer, and transportation, and shall prioritize the extension of services to residential lands in a logical and cost-efficient sequence consistent with the conversion standards for urbanizable lands within the UGB.

Policy 2.1.4 The City shall support infill and redevelopment of underutilized residential land within the UGB as the preferred means of accommodating housing growth before pursuing UGB expansion for residential uses.

Goal 2.2: Ensure that Development Code standards permit and actively support the housing types needed to meet Boardman's projected demand, with particular emphasis on middle housing, multifamily, and manufactured homes.

Policy 2.2.1 The City shall adopt and maintain clear and objective Development Code standards for all needed housing types, including accessory dwelling units, duplexes, triplexes, fourplexes, cottage clusters, townhomes, and multifamily structures, consistent with the requirements of ORS 197A.400 and applicable middle housing statutes.

Policy 2.2.2 The City shall ensure that Development Code standards such as lot size minimums, setbacks, height limits, parking requirements, and design standards do not function as unnecessary barriers to the development of needed housing types, particularly middle housing and multifamily units.

Policy 2.2.3 The City shall permit manufactured homes on individual lots in residential zones on the same basis as site-built homes and shall permit manufactured home parks in appropriate residential and mixed-use zones, consistent with state law requirements.

Policy 2.2.4 The City shall permit accessory dwelling units on all lots with a primary residential use, consistent with applicable state law, and shall maintain Development Code standards that facilitate rather than discourage their construction.

Goal 2.3: Address housing affordability across all income levels, with priority attention to households earning below 60% of Area Median Income.

Policy 2.3.1 The City shall use the OHNA production target income breakdown as the factual basis for housing affordability policy, recognizing that approximately 39% of Boardman's 20-year housing need is for households earning below 60% of Area Median Income, including extremely low-income households earning below 30% AMI.

Policy 2.3.2 The City shall actively seek state and federal funding, tax credit programs, and other financing tools to support the development of income-restricted affordable housing in Boardman, and shall work with nonprofit housing developers, the Oregon Housing and Community Services (OHCS), and other partners to bring affordable housing projects to the city.

Policy 2.3.3 The City shall maintain and support existing affordable housing properties and shall work with property owners and OHCS to prevent loss of affordability restrictions on these units.

Policy 2.3.4 The City shall use Development Code tools like density bonuses, reduced parking requirements, and expedited review to reduce barriers to the development of housing affordable to lower-income households.

Goal 2.4: Ensure that housing supply reflects the specific household characteristics of Boardman's community, including large family sizes, an agricultural workforce, and a predominantly Hispanic and Latino population.

Policy 2.4.1 The City shall ensure that Development Code standards permit and encourage the development of housing units large enough to serve family households.

Policy 2.4.2 The City shall maintain zoning provisions that permit agricultural worker housing and shall work with agricultural employers, farmworker housing nonprofits, and state agencies to support the development of additional farmworker housing units.

Policy 2.4.3 The City shall engage Boardman's Hispanic and Latino community in the design of housing programs and policies to ensure they reflect the community's actual needs and preferences.

Goal 2.5: Support housing development that is compatible with neighborhood character, connected to services, and resilient over time.

Policy 2.5.1 The City shall promote residential development in areas that are proximate to schools, parks, commercial services, and transit connections, and shall use zoning and Development Code standards to encourage walkable neighborhood patterns that reduce reliance on automobile travel.

Policy 2.5.2 The City shall ensure that new residential development in all zones meets applicable clear and objective design standards that maintain neighborhood compatibility and quality while not functioning as barriers to needed housing types.

Policy 2.5.3 The City shall encourage the rehabilitation and maintenance of the existing housing stock and that allow lawfully established residential uses made non-conforming by updated zoning to continue, be maintained, and transition to conforming uses through clear conversion pathways.

Policy 2.5.4 The City shall ensure that housing policies and economic development policies are mutually supportive, recognizing that adequate workforce housing across a range of types and price points is a prerequisite for employer recruitment and retention, as documented in the adopted EOA.

Considerations:

Draft housing goals and policies reflect State requirements and aim to implement the findings of the OHNA and HCA. Goal 2.5 contains subjective language that is commonly flagged ("compatible with neighborhood character"), however specific policies note that clear and objective standards are required within the development code.

Policy 2.5.2 is somewhat unclear. Recommend rewording to “The City shall ensure that new residential development in all zones meets applicable clear and objective design standards, **which are designed to maintain** neighborhood compatibility and quality **without imposing** barriers to needed housing types.”

Policy 2.9.4 The City shall recognize that adequate workforce housing across a range of types and price points is a prerequisite for economic growth and employer recruitment and shall ensure that housing and economic development policies are mutually supportive.

Considerations:

Policy 2.9.4 is a good link between workforce housing and economic development. The City could also consider adding language to this or another policy noting that childcare facilities are another key component of growing and maintaining a strong workforce.

Goal 2.10: Maintain a land use planning process and policy framework grounded in current data and community priorities, implemented through a consistent and regularly updated Comprehensive Plan and Development Code.

Policy 2.10.1 The City shall ensure that all land use decisions are grounded in a factual basis, including current demographic data, buildable land inventories, and the findings of the adopted EOA, HCA, Transportation System Plan, Parks Master Plan, and other supporting technical studies.

Policy 2.10.2 The City shall maintain consistency between this Comprehensive Plan, the Development Code, the Comprehensive Plan Map, and the Zoning Map, and shall update these documents in a coordinated manner to ensure that adopted policies are reflected in implementing regulations.

Policy 2.10.3 The City shall periodically review and update this Comprehensive Plan and its supporting technical studies to ensure they remain consistent with state requirements, reflect current community priorities, and provide an accurate factual basis for land use decisions.

Policy 2.10.4 The City shall plan for a city center that serves as Boardman's civic and commercial heart and shall use the Development Code and land use designations to support investment in this area.

Policy 2.10.5 The City shall maintain clear and objective development regulations that provide predictability for property owners, applicants, and the public, and shall review and update the Development Code on a regular basis to remove barriers to needed development and ensure alignment with current Comprehensive Plan policy.

Goal 2.11: Manage the Urban Growth Boundary to meet 20-year land needs, prioritizing infill and logical service extension within the existing boundary before pursuing expansion.

Policy 2.11.1 The City shall encourage orderly conversion of urbanizable lands within the UGB in a pattern that assures the economical extension of municipal services, prioritizing lands adjacent to existing development and infrastructure before converting lands at the fringe of the UGB.

Policy 2.11.2 The City shall manage growth so that urban development is served by water, sewer, transportation, and other public facilities before or concurrent with development, and shall not approve conversion of urbanizable lands within the UGB where the extension of services is not feasible within a reasonable timeframe.

Policy 2.11.3 The City shall avoid sprawl and leap-frog development by encouraging infill and compact development within existing urban areas before converting urbanizable lands within the UGB.

Policy 2.11.4 The City shall use the Comprehensive Plan Map, Zoning Map, and Development Code to direct growth to areas where services can be efficiently extended, where development is compatible with adjacent land uses, and where public investment in infrastructure can be maximized.

Policy 2.11.5 The City shall maintain a current inventory of buildable land within the UGB, monitor supply against 20-year needs as established in the adopted EOA and HCA, and shall initiate UGB amendment proceedings when the inventory indicates that supply is insufficient to meet projected demand.

Policy 2.11.6 The City shall encourage infill and redevelopment of underutilized land within the UGB as the preferred means of accommodating growth before pursuing UGB expansion for residential or commercial uses where feasible.

Policy 2.11.7 The City shall work with Morrow County to maintain and amend the Urban Growth Boundary consistent with the Joint Management Agreement, and shall seek to update that agreement, as opportunities allow, to reflect the findings of the adopted EOA and HCA and the land supply needs documented in this Comprehensive Plan update.

Policy 2.11.8 The City shall coordinate with the Port of Morrow, Oregon Department of Land Conservation and Development, Oregon Department of Transportation, and other state and regional agencies on land use decisions and UGB planning processes that affect areas of shared jurisdiction or regional significance.

Policy 2.11.9 The City shall maintain Comprehensive Plan Map designations for all urbanizable land within the UGB that identify the intended urban use of each area, so land divisions, infrastructure planning, and eventual annexation are guided by the use for which each area is ultimately planned.

Policy 2.11.10 The City shall require, as conditions of annexation for urbanizable lands within the UGB, that: (a) the land is contiguous with existing city limits; (b) municipal water, sewer, and transportation facilities are available or can be extended concurrent with

development; (c) the proposed development is consistent with the Comprehensive Plan Map designation for the area; and (d) the annexation supports the orderly and efficient extension of urban services consistent with the sequencing priorities of this plan.

Policy 2.11.11 The City shall not extend municipal water service to urbanizable lands within the UGB without concurrent provision of or a binding commitment to municipal sewer service, to prevent partial infrastructure investment that would entrench development patterns inconsistent with planned urban densities.

Policy 2.11.12 The City shall seek to assume land use and land division authority and responsibility for lands within the Urban Growth Boundary but outside the city limits in coordination with Morrow County and through an updated Joint Management Agreement, in order to prevent rural-density development that would foreclose planned urban use and density.

Policy 2.11.13 The City shall designate the West Glenn neighborhood on the Comprehensive Plan Map for commercial use with residential as an ancillary use, recognizing the area's established commercial character and trucking-related operations, and shall apply Development Code standards at annexation that accommodate existing commercial uses while permitting continued residential occupancy.

Goal 2.12: Plan ahead for the Urban Growth Boundary expansions that Boardman's projected residential and employment growth will require, including through the designation of urban reserves, and sequence those expansions to protect resource lands and ensure efficient provision of public services.

Policy 2.12.1 The City shall pursue a UGB expansion for employment lands consistent with the findings of the adopted EOA, which identifies a need for approximately 810 additional gross acres that cannot be accommodated within the current boundary.

Policy 2.12.2 The City shall evaluate residential UGB expansion needs on a periodic basis using the OHNA production target and current buildable land inventory as the primary measures of sufficiency and shall initiate residential UGB expansion proceedings when the inventory of buildable residential land is insufficient to accommodate the remaining 20-year production target.

Policy 2.12.3 In evaluating and sequencing UGB expansions for either employment or residential uses, the City shall give preference to lands that minimize impacts to productive agricultural lands, are contiguous with existing development, can be efficiently served by existing or planned infrastructure, and are consistent with the land use designations and transition standards of this Comprehensive Plan.

Policy 2.12.4 The City shall ensure that UGB amendments are supported by an adequate factual basis, including updated population and employment forecasts, buildable land inventories, infrastructure capacity analysis, and findings of consistency with Oregon Statewide Planning Goals and applicable administrative rules.

Policy 2.12.5 The City shall ensure that large industrial and employment lands brought into the UGB through expansion are designated for their identified use and protected consistent with the requirements of Oregon Statewide Planning Goal 9 and its administrative rules, including limitations on alternative uses of large-lot industrial land.

Policy 2.12.6 The City shall work with Morrow County to establish urban reserves outside the Urban Growth Boundary to identify lands suitable for orderly and efficient transition to urban use over the long term for both employment and residential purposes.

Policy 2.12.7 The City shall pursue urban reserve designation as a means of protecting lands needed for future urbanization from rural-density development and parcelization that would foreclose their efficient transition to urban use and shall coordinate with Morrow County so that county zoning applied to designated urban reserve lands supports, rather than undermines, future urban development.

Policy 2.12.8 In identifying and prioritizing urban reserve lands, the City shall apply the criteria in Policy 2.12.3 and give preference to lands consistent with the employment and residential land needs documented in the adopted EOA and HCA, including lands in proximity to and served by the Port of Morrow.

Goal 2.13: Ensure that land use and urbanization decisions reflect the community's vision for a more compact, connected, and livable Boardman.

Policy 2.13.1 The City shall use land use designations, zoning standards, and infrastructure investments to promote a growth pattern that strengthens Boardman's city center, supports walkable neighborhoods, and reduces the dispersed, disconnected development pattern that has characterized much of the city's growth.

Policy 2.13.2 The City shall ensure that urbanizable lands designated for residential use on the Comprehensive Plan Map are zoned at annexation to permit the density and housing types needed to meet the OHNA production target, including middle housing and multifamily.

Policy 2.13.3 The City shall require community engagement and planning prior to the annexation of large land areas or significant UGB expansions to ensure that growth decisions reflect the community's vision and are informed by current residents.

Considerations:

Recommend modifying language within the introductory narrative to reflect the findings of the HCA, which does not identify a deficiency of residential land within the City's current UGB for the next 20 years.

Chapter 3: Services

This chapter consolidates parks and recreation, public facilities and infrastructure, and transportation needs and future access to reflect updated City plans.

Goals and Policies

Goal 3.1: Create an inclusive and accessible park system that ensures all residents, regardless of age, ability, background, or income, have access to safe, well-maintained parks and recreational opportunities.

Policy 3.1.1 The City shall implement the Boardman Parks Master Plan as the guiding framework for park acquisition, development, and improvement, and shall maintain a level-of-service target of at least 15 acres of developed parkland per 1,000 weighted service population.

Policy 3.1.2 The City shall prioritize closing walkable park-access gaps in underserved areas, particularly south and northeast Boardman, with the goal that all residents live within a 10-minute walk of a developed park.

Policy 3.1.3 The City shall ensure that parks and recreational facilities meet applicable accessibility standards, including ADA-compliant routes, restrooms, play areas, and water access, and shall incorporate universal and inclusive design in new and upgraded facilities.

Policy 3.1.4 The City shall provide culturally inclusive park features, including bilingual signage and wayfinding, and shall engage Boardman's Hispanic and Latino community and other underrepresented groups in the design of parks and recreation programs.

Goal 3.5: Improve park infrastructure, safety, and connectivity by investing in well-maintained, safe, and connected parks.

Policy 3.5.1 The City shall improve safe access to parks through sidewalk infill, lighting, improved crossings of I-84, the railroad, and truck corridors, and multilingual wayfinding that links parks, schools, neighborhoods, and the waterfront.

Policy 3.5.2 The City shall maintain parks to consistent safety, ADA, and design standards, and shall implement proactive maintenance practices that keep facilities clean, safe, and reliable as the system grows.

Considerations:

Parks and Rec. Recommend consolidating duplicative policies. For instance, policies in Goal 3.1 overlap with those in Goal 3.5. Could connect to the availability of Development Ready Lands in close-proximity to existing parks or green spaces for priority investments.

Infrastructure and Transportation. *No modifications recommended.*

Chapter 4: Nature

The Natural Resources and Environment subsection consolidates natural resources, scenic and historic areas, and open spaces; air, water, and land resources quality.

Considerations: *No modifications recommended.*

The Climate Change and Natural Hazards subsection focuses on areas subject to natural hazards and energy conservation to reflect updated City plans.

Goals and Policies

Goal 4.4: Protect people and property from natural hazards by aligning the City's planning and development with the adopted Morrow County Multi-Jurisdictional Natural Hazards Mitigation Plan.**

Policy 4.4.1 The City shall maintain the Morrow County Multi-Jurisdictional Natural Hazards Mitigation Plan (NHMP) as the City's natural hazards mitigation strategy, implement the mitigation actions identified in that plan for the City of Boardman, and participate in future updates of the plan.

Policy 4.4.2 The City shall consider natural hazard risk, including flood, wildfire, extreme heat, windstorm, and drought, in its land use decisions and in the location and design of public facilities, and shall consider measures to avoid or mitigate undue risk to people and property.

Policy 4.4.3 The City shall maintain its participation in the National Flood Insurance Program (NFIP) and apply its floodplain regulations to development in mapped flood hazard areas, recognizing that while regulation of the Columbia River has reduced flood risk, localized flood hazards remain.

Policy 4.4.4 The City shall coordinate with Morrow County, the Boardman Rural Fire Protection District, the Oregon Department of Forestry, and other partners to reduce wildfire risk in and around the community, including vegetation management in parks, trails, and the wildland-urban interface.

Policy 4.4.5 The City shall reduce the community's exposure to extreme heat by incorporating shade, tree canopy, cooling features, and heat-resilient design into parks, public spaces, and development, with particular attention to older adults, outdoor workers, and other residents most vulnerable to heat.

Policy 4.4.6 The City shall manage wind-blown dust and erosion by encouraging the stabilization and revegetation of disturbed and undeveloped land and by applying appropriate erosion and sediment control standards to development.

Policy 4.4.7 The City shall provide hazard information and emergency preparedness outreach in English and shall seek to make such materials accessible in Spanish, recognizing the needs of Boardman's predominantly Latino, family-oriented community and other vulnerable populations.

Goal 4.5: Conserve energy and resources and ensure that large energy- and water-intensive development supports, rather than strains, the community's long-term resilience.

Policy 4.5.1 The City shall promote compact, walkable development patterns that locate higher-density housing near schools, parks, shopping, and transit, reducing energy consumed in travel.

Policy 4.5.2 The City shall support alternatives to automobile travel, including the bikeways, sidewalks, and multimodal connections identified in the Transportation System Plan, as a means of conserving energy.

Policy 4.5.3 The City shall encourage energy-efficient building design, site planning, and development practices, and shall support the use of renewable energy, including solar, where appropriate.

Policy 4.5.4 The City shall support energy and water efficiency in its own facilities and operations, including its water and wastewater systems, and shall consider energy and operating cost in the design of public infrastructure.

Policy 4.5.5 The City recognizes that the Boardman area has become a regional center for data centers and other large energy- and water-intensive industrial uses, and that this growth brings both economic opportunity and new pressure on the community's water supply, energy infrastructure, and natural resources. The City shall plan for these uses deliberately, so that they strengthen rather than strain the community's long-term resilience.

Policy 4.5.6 The City shall coordinate with the Port of Morrow, Morrow County, utility providers, and the State to understand and plan for the water and energy demands of large industrial users within and adjacent to the UGB, and to ensure that the City's own drinking-water supply, groundwater resources, and residents' utility service are protected as a first priority.

Policy 4.5.7 The City shall evaluate clear and objective siting and development standards for data centers and other high-intensity water and energy users, which may address water-efficient cooling, on-site or contracted renewable energy, stormwater and waste heat management, noise, backup-generator emissions, and buffering from residential areas.

Policy 4.5.8 The City shall encourage large energy users to meet their demand with new clean energy resources and to contribute to the resilience of the regional energy and water systems they rely on, so that the costs of growth are not shifted onto Boardman's households and existing businesses.

Considerations: Policy 4.4.2 could consider including housing/residential development, as opposed to just public infrastructure. Alternatively, a policy can be added that references the constraints identified within the BLI and the efforts the City is making to promote residential development in areas of low-risk. Reducing property risk is mentioned in the overarching goal, but not within the individual policies.

In addition to Policy 4.5.3, there could be a policy regarding weatherization efforts to preserve the existing housing supply, as a contribution to conservation efforts. *See Appendix A: Category D below for more information.*

Boardman Development Code

In order to create consistency across planning procedures and documents and indicate Boardman's approach and measures to accommodate needed housing, the project team conducted a review of the City's existing Development Code (BDC), in accordance with ORS 197A.270 (5). The BDC will be updated as a separate effort as part of the Strategic Plan Process, and these recommendations and strategies for Development Code updates will support the City's efforts.

General Structure

While the general structure of the Development Code may not have direct implications for the City and its capacity to accommodate housing, recommendations may support cohesion across the Code in regard to housing standards.

Considerations:

Boardman's development code currently exists as a series of PDFs on the City's website. Other municipal code items are available via Municode, which is generally easier to access and use from a development/public perspective. If retaining PDF format, consider combining into one PDF with chapter bookmarks, allowing for increased searchability and ease when updating or ensuring consistency across chapters.

Ensure headings match sections. For example, the Chapter 2.2 within the Land Use Districts Chapter is labeled as "Placeholder for Downtown District (Pending)" though Chapter 2.2 is labeled as the Commercial District.

Chapter 1.2 - Definitions

Accessory Dwelling - An accessory dwelling is a small, secondary housing unit on a single family lot, usually the size of a studio apartment. See Chapter 2.1, Section 200.B.

Cottage - A small house that may be used as an accessory dwelling, in conformance with Chapter 2.1, Section 200.B.

Duplex - A building with two attached housing units on one lot or parcel.

Single-family attached housing (townhomes) - Two or more single family dwellings with common end-walls. See also, Chapter 2.1, Section 110 and Section 200.

Single-family detached house - A single family dwelling that does not share a wall with any other building. See also Chapter 2.1, Section 110.

Single-family detached zero-lot line house - A single family detached house with one side yard setback equal to "0". See also, Chapter 2.1, Section 110 and Section 200.

Considerations:

Regarding housing types, the OHNA Model Code for Medium Cities ("Model Code") recommends consolidating definitions for housing types, so unit types are all included in one location. Suggest

modifying definitions within Chapter 1.2 to mimic structure within the model code, paying special attention to include language that is less limiting, though still clear and objective. Housing type definitions could be updated for accessory dwelling units, cottage clusters, detached single unit, duplexes, middle housing (which currently is not included in the chapter), multi-unit housing, quadplex, townhome, and triplex. These types of housing are referenced in the 2026 Comprehensive Plan Update and should be reflected in the BDC.

Chapter 2.1 - Residential Districts

Chapter 2.1 pertains to residential districts and subdistricts within the City of Boardman; overall representing one Base Residential District and four Sub-Districts (Future Urban, Multi-Family, Manufactured Home Park, and Sunridge Terrace Sub-District). In the Code, lot area, lot coverage, and building height standards are organized by housing type, though some information is missing from certain housing unit types. Table 5 below has been populated with what is available in the BDC, alongside some assumptions made regarding density.

Table 5. Housing Standards within the Boardman Development Code

Housing type / district		Minimum lot area	Maximum density	Max. lot coverage	Max. height
Residential District	Accessory Dwelling Unit	N/A	N/A	N/A Max 1,200 sq.ft FA	25 ft
	Single-family detached	8,000 sf per site	*Assumed density: 6 units/acre	40%	35 ft gabled / 30 ft flat or 2.5 stories
	Duplex	8,000 sf per site	*Assumed density: 10.9 units/acre	60%	
	Triplex	9,000 sf per site	*Assumed density: 14.5 units/acre	60%	
MF Sub-District Multi-family		10,000 sf minimum	*Assumed density: 20 units/acre	60%	30 ft or 3 stories
Manufactured Home Park (MH Sub District)		2,500 sf minimum pad	12 units/acre	N/A	n/a
Master Planned Development		n/a	6 units/acre	N/A	n/a
Future Urban (FU) Sub District		10 acres minimum	*Assumed density: 6 units/acre	50%	35 ft or 2 stories

**Assumed density figures are calculated from the minimum lot area standard in Development Code (43,560 square feet per acre divided by minimum lot area per unit multiplied by number of units) for the purposes of the analysis and are not stated in the code.*

While the DLCD Model Code for Medium Cities makes recommendations based on Floor-Area-Ration (FAR) versus lot coverage, some jurisdictions prefer to keep lot coverage for ease of use. The

current development standards within the BDC are not particularly restrictive within the Base Residential District and may offer more flexibility in lot coverage than the Model Code's recommended FAR (1:1 for single-family detached versus 0.6:1). However, within the Multi-Family Sub-District, that ratio starts to become more restrictive.

Additionally, while certain provisions like (1) zero-lot-line single-family housing and (2) mid-block shared lane access and flag lot provisions may support infill development, there are other standards that may create barriers to middle housing development:

- Setbacks for housing units within the Residential District and Multi-Family Sub-District (aside from the zero-lot line housing exemptions) are higher than that in the Model Code (front and rear setbacks being 15 feet versus the recommended 5 feet within the Model Code) (Section 2.1.120).
- Duplexes and Triplexes are subject to approval through a Type III review, if exceeding the 2.5 story (30 feet) height restriction (Section 2.1.190).
- Quadplexes (or more than 3-units) are not permitted within the Residential District.
- Townhomes within the Residential District are not permitted to exceed 4 consecutively attached units (Section 2.1.190). Within the Multi-Family subdistrict, 6 consecutive units are permitted.
- Multi-Family housing (more than 3 units) and Mixed-Use buildings are only permitted within the Multifamily Sub-District and not allowed within the Base Residential District (Table 2.1.110A).
- Standards for cottages or cottage clusters are not included within the current BDC. Staff has expressed interest in allowing cottages/cottage clusters within Boardman.
- Accessory dwelling units (ADUs) appear to be included within Section 2.1.190 (F), though ORS 197A.425-specific language required for jurisdictions with populations of 2,500 or greater, allowing one ADU outright, is not included. Review procedures would change for this type of housing, potentially dialing back review type to a Ministerial (Type I) decision, once this language is added.
- Master Planned Development housing is restricted to a maximum of 6 units per acre, though allowing for density increases up to 15%, as long as the Comprehensive Plan permits (Section 2.1.190 and Chapter 4.5).

Considerations:

The proposed modifications to the Boardman Development Code could increase the City's ability to provide needed housing and reduce barriers to housing development.

Organization: Consider changing the organization of residential zones from the current Zone / Subdistrict organization to a more straightforward base zone approach. City staff have expressed frustration with the overlapping standards that result from the current process.

Purpose Statements: Align the purpose statements in 2.1.100 and subsequent Residential Sub Districts with the updated goals and policies within the Comprehensive Plan, when adopted.

Permit One ADU and Duplexes Outright. While this is the case within the Code, it could help to state this more explicitly. This would result in the addition of an ADU being a Type I ministerial decision.

Allow Quadplexes and Multi-Family Housing Outright in All Residential Districts. Additional standards could be included for building height, step-downs near lower-density housing types, and buffers. Allowing for middle housing types across zones would support more infill development opportunities.

Define ADU and Cottage Cluster Development and Design Standards. There are options for the City to include ADUs and cottage clusters more distinctly within the Code. The City of Molalla has a specific special use standard section for Accessory Dwellings (Section 17-2.3.160), where review type, floor area, building design, and height are all included. This is similar to the current BDC, though they include one ADU outright per legal lot. The City of Gold Beach includes a designated Cottage Cluster Development Standards section. Similar to Boardman, they only have one Base Residential Zone, so this helps outline design and development standards that set this style of housing apart from others.

Decrease Front and Rear Setbacks within the Base Residential District. The Model Code includes smaller setbacks (nearly a third of what the BDC includes). By reducing the setbacks, it will allow for smaller lots to become viable options for development. *See Chapter 5.1 – Variances discussion.*

Chapter 2.2 - Commercial Districts

Chapter 2.2 includes standards for the Base Commercial District as well as the three subdistricts; Tourist Commercial, City Center, and Service Center. While each of the commercial districts permits residential uses, they are all conditional. Each of the districts intends to incorporate residential development in some capacity, including:

- Commercial Base District – To offer flexibility for mixed-use development
- Tourist Commercial Sub-District – Same as the Commercial Base District, but in service of the public and travelers at the I-84 interchange
- City Center Sub-District – To offer flexibility for mixed-use development and to integrate human-scale design elements for a more walkable environment
- Service Center Sub-District – To accommodate heavy commercial uses and light industrial uses along I-84, which includes employees of these economic areas

Table 6. Housing Standards within the Commercial District and Sub-District

District/Sub-District	Permitted
Commercial District	Conditional Use; Single-family, duplex, triplex, and multi-family units
Tourist Commercial	
City Center	
Service Center	RV Parks

Considerations:

Current residential development within the Commercial District, Tourist Commercial Sub-District, and City Center Sub-District is permitted as Conditional Use (as opposed to outright). This may be

unnecessarily restrictive for residential and mixed-use development in these areas. There are some options that the City may consider moving forward that could promote additional units. One of which is to leave the Code as-is, though it will be assuming some level of risk and would not support the City's efforts of increasing connectivity and walkable neighborhoods.

Additional options include:

Permit Residential Development Types Outright. This may be too flexible for the City. Though it remains an option.

Remove Residential Uses from Commercial districts. This would require a rezone and potentially a comprehensive plan amendment as part of a residential application in a commercial zone but would serve the purpose of maintaining employment land for employment uses.

Include RV/Mobile Home Park Development Standards within Chapter 2.1. That way the chapter may adopt the standards by reference, and they can be permitted outright as long as the standards are achieved.

It is important to note that State statute ORS 197A.400 requires that any residential development meet Clear and Objective (C&O) Standards, so any code amendments need to meet this standard.

Create C&O Standards for the Commercial District and Sub-District. Continue to allow certain housing development types, though include specific standards or parameters that both meet C&O standards and encourage mixed-use development.

Chapter 2.3 - General Industrial District

No residential uses permitted within the General Industrial District, which does not appear to prevent the City from achieving additional housing standards. These areas were removed from the Buildable Lands Inventory (BLI) analysis, and even with doing so, the City still demonstrates capacity to accommodate projected housing needs.

Recommendations: None.

Chapter 2.4 - Light Industrial District

The stated purpose behind the Light Industrial District is to “provide a balance between jobs and housing and encourage mixed-use development” (Section 2.4.100). However, there are no residential land use types included in Table 2.4.110.A.

Considerations: Similarly to the General Industrial District, the Light Industrial District was not included as a zone that would accommodate housing development. However, language in the purpose or introduction of the chapter should reflect that intention as well.

Chapter 3 - Design Standards

Chapter 3 contains a range of design standards outside of the development standards (e.g., building height, lot sizes, setback requirements) established within Chapter 2. The main sections within Chapter 3 that may create barriers to infill development pertain to Chapters 3.1 and 3.3. Reviews were completed for both sections.

Chapter 3.1 – Access and Circulation includes safe and efficient options for pedestrian and vehicles accessing residential developments (Section 3.1.200). Access Options prioritized access to lowest classification street. Driveway Openings suggest consolidated options and keep maximum width to below those recommended by the Model Code.

Chapter 3.3 – Vehicle and Bicycle Parking includes minimum off-street parking spaces, which omits Accessory Dwelling Units entirely. Table 7 outlines the additional parking requirements (Section 3.3.300 (A)) and compares them to the Model Code.

Table 7. Minimum Required Off-Street Parking Spaces

Housing Type	Boardman Development Code	Model Code
Single Family Detached	2 spaces per unit	1 space per unit
Duplex	2 spaces per unit	1 space per unit
Triplexes	2 spaces per triplex	1 space per triplex
Quadplexes	<i>Quadplexes not mentioned</i>	2 spaces per quadplex
Townhouses	<i>Townhouses grouped with Multi-Family (called “Single Family Attached”)</i>	1 space per unit
Multi-Family	2 spaces per unit	0.5 spaces per unit
Cottage Clusters	<i>Cottages not mentioned</i>	1 space per unit

Considerations for Chapter 3.3

Reducing parking minimums would support infill development and reduce the lot size needed to incorporate parking, particularly with middle-housing types such as duplexes, triplexes, quadplexes, townhomes, multi-family units, and cottage clusters.

Chapter 4.1 – Types of Applications and Review Procedures

Reducing the time and process by which developers can obtain approval may reduce barriers to development. Chapter 2.1 mentions one such example of reducing that time through Accessory Dwelling Unit (ADU) Development.

Considerations. See Chapter 2.1 for Type I considerations for residential development.

Chapter 4.5 - Master Planned Developments

Master Planned Developments are mentioned within Chapter 2.1. Section 4.5.180 lists criteria by which the City may approve a detailed development plan, including an “increase of residential densities or lot coverage” and “changes to the amount of parking” by no more than 15 percent above what is permitted otherwise.

In terms of the review and approval process, there are rigorous, multi-step processes that outline requirements. However, provisions appear to match similarly sized jurisdictions.

Recommendations. Evaluate the appropriateness of the 15 percent cap on increases to densities/parking changes.

Chapter 5.1 – Variances

Chapter 5.1 – Variances is intended to provide some flexibility to the development standards; offering modifications to the requirements based on lot limitations. There are several classes or variances within the chapter:

- Class A Variances include modifications to front and interior setbacks, lot coverage, and landscaping requirements. These types of variances are reviewed through Type I procedures.
- Class B Variances include transportation improvement, access standard, and street tree modifications. These types of variances are reviewed through Type II procedures, as they are more discretionary.
- Class C Variances pertain to hardships or restrictions that are out of the applicant's control. These types of variances are reviewed through Type III procedures.

Class A Variances are the most applicable to residential development, however, they are reviewed through Ministerial (Type I) Review and can be requested based on lot configuration. Variances do not appear to be a hindrance to infill development.

Considerations. Consider adding building height increases to Class Variances. The City of Estacada permits a building height increase of more than ten percent (10%) in certain circumstances (Chapter 16.100), for example.

Class C Variances (Section 5.1.400 (B)) may need to be revisited if parking minimums change.

Appendix A: Additional Measures to Accommodate Needed Housing

In addition to the City's Comprehensive Plan and Development Code, there are many other potential strategies the City could pursue to implement its housing goals. DLCD publishes a list of potential strategies for communities to consider, and the City's own Housing Advisory Committee (HAC) has discussed several of these strategies to date. The full list is included in an attachment to this memorandum, and includes the following categories:

- Category A: Zoning and zone changes
- Category B: Reduce Regulatory Impediments
- Category C: Financial Incentives
- Category D: Financial Resources
- Category E: Tax Exemption and Abatement
- Category F: Land Acquisition, Leases, and Partnerships
- Category Z: Other

The remainder of this section discusses several strategies identified in the DLCD publication, their appropriateness for the City of Boardman, and their level of priority.

Category A: Zoning and Code Changes

Strategy	Priority/Fit for Boardman	Notes
A8 Promote cottage cluster housing	High Priority	<i>Active and detailed HAC discussion.</i> City is pursuing development on city-owned Columbia View property.
A2 Zoning changes for lower-cost housing types	High Priority	<i>Active HAC discussion.</i>
A12 Align lot division density with zoning density	High Priority	As BDC is updated, ensure subdivision standards match changes.
A5 Code provisions for ADUs	High Priority	City code updates are underway.
A23 Accessible design incentives	High Priority	Senior housing flagged as a community priority, with a note that ground-floor units avoid elevator costs. Accessible and adaptable units are a component of HCA need.
A3 Density bonuses	Moderate Priority	<i>Active HAC discussion.</i> Potentially ties incentive to price point rather than to type alone.

Strategy	Priority/Fit for Boardman	Notes
A17 Small dwelling unit developments	Moderate Priority	<i>Lot sizes discussed by HAC.</i> Interest in varying lot sizes throughout the City rather than allowing small lots everywhere.
A16 Manufactured housing preservation zone	Moderate Priority	Manufactured homes are roughly 25% of the stock today.
A7 / A6 SRO and broadened housing-type definitions	Moderate Priority	SRO identified as a component of future housing needs. Discuss zoning allowances and design standards with HAC.
A1 Minimum density standards	Moderate Priority	Minimums can ensure development makes efficient use of available and serviceable residential land.
A19 Density requirements for annexed land	Moderate Priority	Review City annexation policy and code provisions with HAC.
<i>A10 Inclusionary zoning</i>	<i>Not recommended</i>	DLCD's guidance flags the Portland research showing suppression rather than increase in housing production due to this measure.

Category B: Reduce Regulatory Impediments

Strategy	Priority/Fit for Boardman	Notes
B6 Streamline permitting process	High Priority	City capacity to handle volume is an issue. HAC roundtable feedback centered on tracking a project across departments. MMHF recommended investigating software solutions and benchmarking other Oregon models.
B11 Pro-housing agenda and staff capacity	High Priority	HAC discussion noted a shortage of technical staff to guide applicants and noted data center work absorbing bandwidth; a dedicated housing navigator position was raised, referencing Pendleton and Bend, and a shared county-level role
B9 / B10 CIP and public facility planning	High Priority	City currently / has recently undertaken infrastructure planning which will aid in planning for needed housing.

Strategy	Priority/Fit for Boardman	Notes
B18 Prioritize home ownership	High Priority	HAC has strong emphasis on for-sale housing as a way to create starter home opportunities.
B19 Survey applicants on decisions	Moderate Priority	A developer roundtable in June 2026 played this role; decide how frequently to reconvene developers or invite comments.
B5 Reduce regulatory barriers to lot division	Moderate Priority	Smaller lot sizes repeatedly raised by HAC as an affordability lever. Frontage and driveway standards may constrain small-lot for-sale products.
B3 Expedite permitting for needed housing types	Moderate Priority	May be limited by Staff capacity.
B1 Remove or reduce parking minimums	Moderate Priority	Two spaces per unit treated as the Boardman norm, with 1.0 and 1.5 noted as alternatives; HAC members cited limited transit and multi-vehicle households as reasons to keep current standards.
B2 Remove code impediments to conversions	Moderate Priority	The City's housing stock is on the younger side, making conversions less likely/financially feasible in many cases.
<i>B17 Reduce on-site open space</i>	<i>Low Priority</i>	HAC has pushed for public amenity space in recent discussions of the Columbia View project. The Parks Master Plan Update also is in the process of identifying areas of "park drought," which note the NE Quadrant of Boardman as an area in need of park facilities. Recommendations include the conversion of park facilities on commercially zoned land.

Category C: Financial Incentives

Strategy	Priority/Fit for Boardman	Notes
C1 Reduce, defer, or finance SDCs, or offer tiered incentives to hit a particular price point.	High Priority	Deferring SDC payment until after construction completion was raised as a financing-cost reducer and agreed to be a strong idea by the HAC. Developers suggested aligning incentives to the price points the City wants to hit.
C3 SDC reduction for ADUs	High Priority	Consider as part of current ADU work.

Strategy	Priority/Fit for Boardman	Notes
C6 Publicly funded infrastructure	High Priority	Infrastructure planning and projects underway.
C2 SDC schedule tied to dwelling size	Moderate Priority	Small starter homes currently pay the same rates as large homes. But SDC revenue loss has a potential impact on City services.

Category D: Financial Resources

Strategy	Priority/Fit for Boardman	Notes
D3 Housing trust fund	High Priority	Active. Council unanimously approved up to \$50,000 as catalyst funding for the Real Estate Development Master Plan; the committee also moved to recommend up to \$5,000 for pilot participation.
D13 Revolving loan fund	High Priority	Boardman is participating as a pilot city in a statewide Moderate Income Revolving Loan Fund effort backed by \$75 million, structured to share the cost of building the agreements and monitoring templates that rural cities otherwise cannot afford.
D10 TIF set-aside	High Priority	The HAC identified tax increment financing named as one option for funding a shared public amenity before the discussion was deferred.
D5 Employer-assisted housing	High Priority	City entities are pursuing opportunities (per HAC).
D18 Weatherization via community action agency	High Priority	Preserves aging manufactured stock. Umatilla Electric Cooperative (UEC) has a Weatherization Program for single-family and manufactured-type homes that offers rebates to eligible participants.
D9 Construction excise tax	Moderate Priority	Potential source of revenue but may exacerbate already-high construction costs in the region.
D2 / D20 LIHTC and LIFT	Moderate Priority	HAC addresses middle-income housing and hasn't discussed these vehicles for low-income housing in depth.
D1 CDBG	Low Priority	Boardman is non-entitlement; access is through the State program.

Category E: Tax Exemption and Abatement

Strategy	Priority/Fit for Boardman	Notes
E6 Homebuyer Opportunity Limited Tax Exemption	Moderate Priority	<i>Discussed by HAC.</i> Supports ownership products similar to a first-time-homebuyer incentive.
E1 Nonprofit low-income rental exemption	Moderate Priority	Enabling legislation to support nonprofit development of low-income rental housing.

Category F: Land, Acquisition, Lease, and Partnerships

Strategy	Priority/Fit for Boardman	Notes
F10 / F12 Housing on city-owned and surplus land	High Priority	Columbia View is City-owned property; the City also maintains a surplus property program.
F4 Public-private partnership	High Priority	City actively engaged in PPP for Columbia View property.
F16 Regulatory agreement tied to land sale	High Priority	Consider deed restriction or other means for permanently affordable housing.
F7 Education for small developers	High Priority	<i>City undertaking outreach to developers as part of HAC process.</i>
F1 Land banking	High Priority	<i>City is actively pursuing property acquisition and land banking.</i>
F8 Conversion of underperforming commercial	High Priority	<i>City is evaluating Downtown Main Street and Good Shepherd site as potential locations for conversion/investment.</i>
F6 Manufactured home preservation	High Priority	Boardman has significant existing manufactured housing stock, serving low- to moderate- income residents.
F5 Preserve naturally occurring affordable housing	High Priority	Similar to F6.
F19 Preservation inventory	Moderate Priority	Would support F6.

Category Z: Custom options

The HAC has generated several strategies that do not map cleanly onto the DLCD list but would be worth considering or discussing with the HAC.

- **Off-site and modular construction.** Under active research after HAC committee members noted that buyers get more square footage for less in Hermiston, attributed partly to construction labor travel costs. Methods reviewed include cross-laminated timber, steel frame modular, and geopolymer concrete block, alongside the HIVE demonstration project in Newberg building ten middle-income homes using different construction technologies on one lot.
- **Digital zoning and parcel information.** UrbanForm implementation to make zoning and parcel information quickly understandable for any parcel in the city.
- **Project tracking dashboard and single point of entry.** Updated City development software to support applicants and potential developers.
- **Upfront fee forecasting.** HAC has discussed Medford's model for giving applicants a reasonably accurate fee estimate early.