

ORDINANCE NO. 2014-02

ORDINANCE ADOPTING POST-ACKNOWLEDGMENT PLAN AMENDMENT WORK PRODUCTS RELATED TO THE UPDATE OF THE CITY OF FOREST GROVE COMPREHENSIVE PLAN. FILE NO. CPA-13-01369

WHEREAS, ORS Chapter 197 establishes procedures for post-acknowledgement plan amendments to adopted Comprehensive Plan; and

WHEREAS, the Post Acknowledgment Plan Amendment items address Citizen Involvement, Background Chapter; Land Use Chapter and Comprehensive Plan Land Use Map, Community Sustainability, Natural Resources and Natural Hazards including Environmental Quality and Physical Environment, and Schools and Education; and

WHEREAS, the City completed the Post-Acknowledgment Plan Amendment work products; and

WHEREAS, the City implemented a citizen participation program to facilitate public participation in the development of the Comprehensive Plan; and

WHEREAS, the citizen participation program included the following elements; and

WHEREAS, the Planning Commission held multiple work sessions on the Comprehensive Plan text and land use map; and

WHEREAS, notice was provided to the Oregon Department of Land Conservation and Development and Metro in advance of the public hearings as required by ORS and Metro Code; and

WHEREAS, the Planning Commission held public hearings on the Comprehensive Plan and Transportation System Plan work products on November 4, 2013, November 18, 2013, December 2, 2013, and December 16, 2013; and

WHEREAS, the Planning Commission considered public comments made during the public hearings and modified recommendations pertaining the Comprehensive Plan land use map and Transportation System Plan; and

WHEREAS, on December 16, 2013, the Planning Commission unanimously approved a motion to accept the Comprehensive Plan post-acknowledgment-plan-amendment work products and recommend City Council approval; and

WHEREAS, notice of the City Council public hearing on this matter was mailed to affected property owners and interested persons on December 26, 2013; and

WHEREAS, notice of the City Council Public Hearing was published in the *Forest Grove News-Times* on January 8, 2013 as required by the Forest Grove Development Code; and

WHEREAS, the City Council held a duly-noticed Public Hearing on January 13 and January 27, 2014.

NOW THEREFORE, THE CITY OF FOREST GROVE ORDAINS AS FOLLOWS:

Section 1. The City Council of the City of Forest Grove hereby adopts the Comprehensive Plan Post-Acknowledgement-Plan-Amendment work products shown on Exhibit A.

Section 2. The City Council hereby adopts and modifies the Comprehensive Plan Map as recommended by the Planning Commission and shown on Exhibit B.

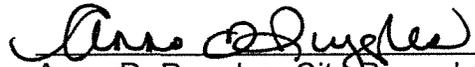
Section 3. The City Council hereby adopts the Planning Commission staff reports dated November 4, 2013, November 18, 2013, December 2 2013, and December 16 2013.

Section 4. The City Council hereby adopts the findings of fact supporting the Comprehensive Plan attached as Exhibit C.

Section 5. This ordinance is effective 30 days following its enactment by the City Council.

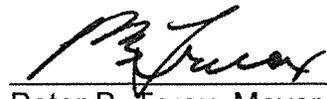
PRESENTED AND PASSED the first reading the 13th day of January, 2014.

PASSED the second reading the 27th day of January, 2014.



Anna D. Ruggles, City Recorder

APPROVED by the Mayor this 27th day of January, 2014.



Peter B. Truax, Mayor

**Forest Grove Comprehensive Plan
List of Post-Acknowledgement-Plan-Amendment Products**

- Task A: Citizen Involvement Chapter Text
1. Revised Comprehensive Plan Citizen Involvement Chapter
- Task B: Comprehensive Plan Background Chapter Text
1. Revised Comprehensive Plan Chapter I: Introduction
2. Revised Comprehensive Plan Chapter II: The Planning Process
a. Add new plan amendment process section
- Task C: Comprehensive Plan Land Use Chapter Text
1. Revised Land Use Chapter
a. Include Proposal for Mixed-Use Development Zone
b. Updated Comprehensive Plan Map
c. 2011 Land Use inventory
d. Revised Historic resources text and maps.
- Task D: Comprehensive Plan Community Sustainability Chapter Text
a. Add new chapter to Comprehensive Plan
- Task E: Natural Resources and Hazards
A. Urban/Wildland Interface
B. Earthquake Hazards
C. Other hazards
- Task F: Environmental Quality Chapter Text
A. Revised Environmental Quality Chapter for Comprehensive
- Task G: Energy Chapter of Comprehensive Plan
A. Revised Energy Chapter of Comprehensive Plan
- Task H: Physical Environment Text
A. Revised Physical Environment Chapter for Comp. Plan
- Task I: School Element Text
A. Coordination with Forest Grove School District
B. Draft School Chapter of Comprehensive Plan

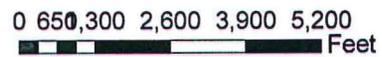
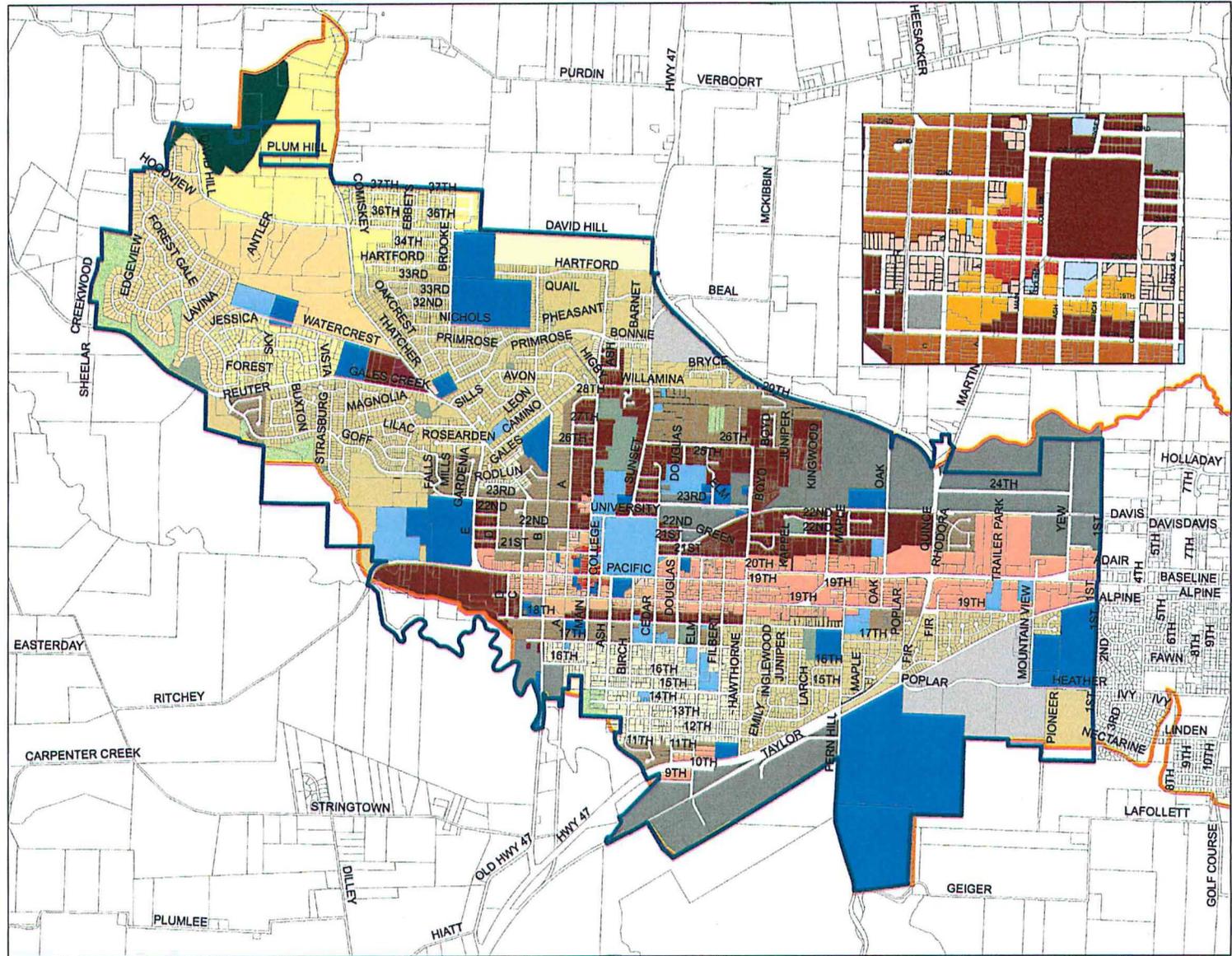


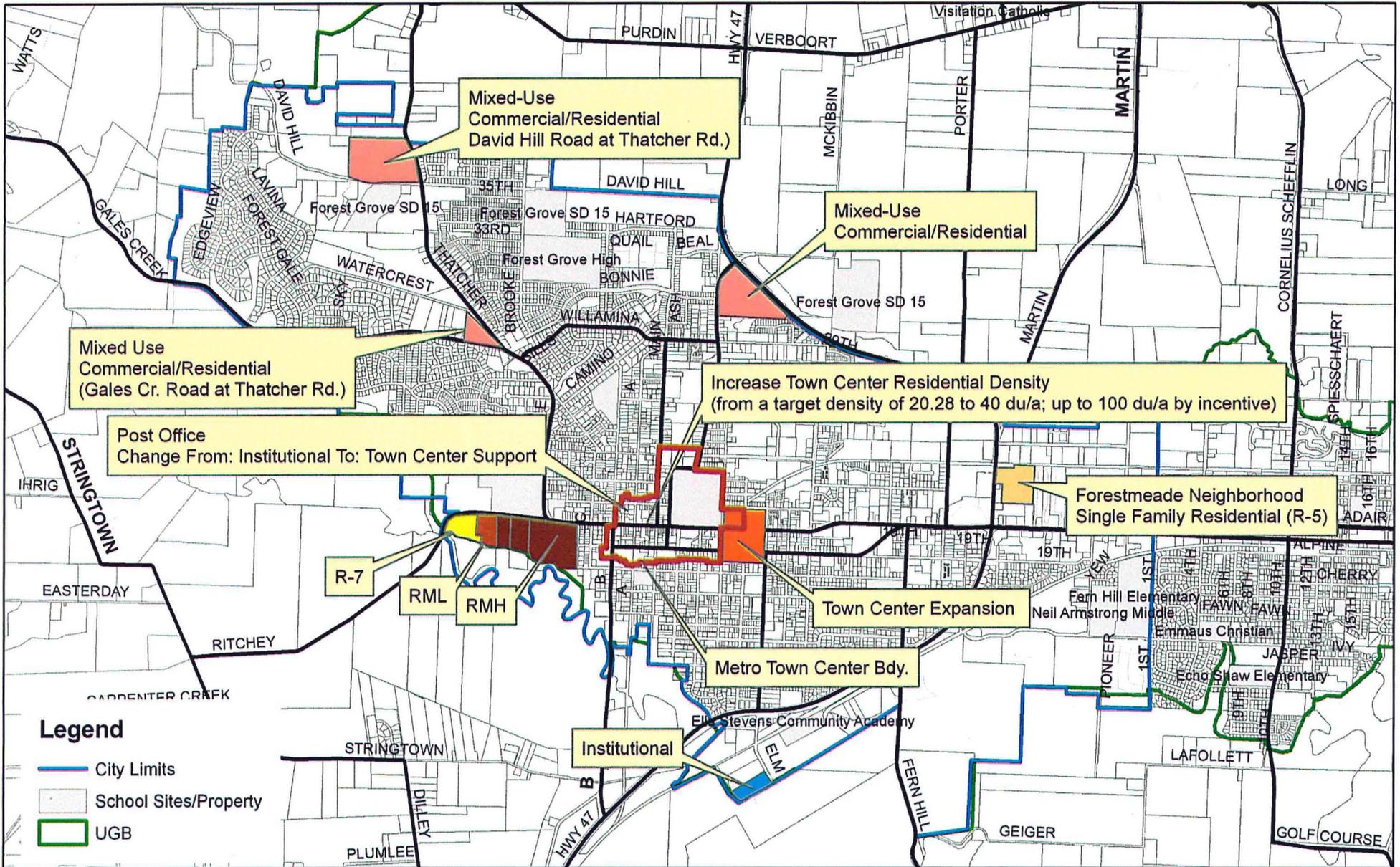
City of Forest Grove Comprehensive Plan Designations

Comprehensive Plan Designations

COMP_PLAN

- A-Medium
- B-C
- B-Standard
- C-Low
- Commercial Auto
- Commercial Neighborhood
- Commercial Planned Development
- D-Suburban
- Existing Park
- General Industrial
- High Density Residential
- Light Industrial
- Medium Density Residential
- Open Space
- Public
- Semi-Public
- TCC
- TCS
- TCT
- Urban Growth Boundary
- City Limits





PLANNING COMMISSION RECOMMENDATION

Comprehensive Plan

Land Use Concept



**Planning Commission Findings and Decision to Recommend Approval of
Comprehensive Plan Periodic Review and Post-Acknowledgment Plan
Amendment Work Products and Transportation System Plan Update**

WHEREAS, the Department of Land Conservation and Development issued Periodic Review Work Program Approval Order 001786 on April 15, 2010; and

WHEREAS, the Periodic Review Work Program directs the City to updated the Forest Grove Comprehensive Plan in the areas of citizen involvement, housing needs and buildable lands inventory, economic development, public facilities and urban services, transportation, evaluation of alternative development scenarios, concept plans and policies, urbanization, and future population projects; and

WHEREAS, the City desires to revise the entire Comprehensive Plan and add provisions pursuant with the Post-Acknowledgment Plan Amendment procedures described by Oregon Revised Statutes Chapter 197; and

WHEREAS, post acknowledgement plan amendments to the Comprehensive Plan affect the following areas of the Comprehensive Plan including Community Sustainability, Natural Resources and Natural Hazards, Schools and Education, Community Services, and Citizen Involvement; and

WHEREAS, to comply with the Periodic Review Approval Order 00186, the City updated the 2010 Transportation System Plan to reflect recommended changes to the Comprehensive Plan land use map; and

WHEREAS, the updated Transportation System Plan brings the Transportation System Plan into substantial conformance with the 2035 Metro Regional Transportation Plan and Regional Transportation Functional Plan; and

WHEREAS, notice of the proposed Comprehensive Plan amendments and Transportation System Plan update were provided to the Department of Land Conservation and Development on September 30, 2013 as required by state law (ORS Chapter 197.610 and OAR 660-018-0010); and

WHEREAS, the notice of the proposed Comprehensive Plan amendments and Transportation System Update was mailed to property owners and interested persons on October 15, 2013 in advance of the Planning Commissions public hearings; and

WHEREAS, notice of the Planning Commission public hearing on the proposed Comprehensive Plan amendments and Transportation System Plan Update was published in the *Forest Grove News Times* on October 30, 2013, November 13, 2013, November 27, 2013, and December 11, 2013 as required by Development Code Section 10.1.710; and

WHEREAS, the Planning Commission held four duly-noticed public hearings on the Comprehensive Plan amendments and Transportation System Plan Update on November 4, 2013, November 18, 2013, December 2, 2013 and December 16, 2013; and

After considering public testimony and holding deliberations on the Comprehensive Plan Amendments and 2035 Transportation System Plan Update, the City of Forest Grove Planning Commission does hereby recommend adoption of the Forest Grove Comprehensive Plan Periodic Review and Post-Acknowledgement-Plan-Amendment work products and 2035

Transportation System Plan Update making the following specific findings in support of this decision:

Approval Criteria and Findings

Under state law, amendments to a local *Comprehensive Plan* must be considered based on the following criteria:

1. Compliance with applicable state of Oregon Land Use Planning Goals,
2. Consistency with the Metro Regional Framework Plan, Metro Urban Growth Management Functional Plan, and
3. Compliance with relevant policies of the Comprehensive Plan.

The following section describes how the Comprehensive Plan amendments comply with applicable state of Oregon Land Use Planning Goals.

Oregon Statewide Land Use Planning Goals

Goal 1 (Citizen Involvement): The purpose of Goal 1 is to require a citizen involvement program that insures the opportunity for citizens to be involved in all phases of the planning process.

Analysis: The City implemented a citizen involvement program employing a variety of techniques to ensure opportunity for involvement in all phases of the comprehensive plan update process.

Finding: The City of Forest Grove implemented a robust citizen involvement program for purposes of updating the Forest Grove Comprehensive Plan. The Citizen Involvement Strategy, dated July 2010, provided guidance for community outreach during the comprehensive plan update process.

The citizen involvement program included many opportunities for citizen involvement including project newsletters, surveys, comment open houses, input via the project website and multiple Planning Commission work sessions on specific topics. The record includes documentation of the meetings held during the work program phase of the Comprehensive Plan update. The following opportunities for public involvement were provided:

| Meeting | Topic | Date |
|-----------------|--|--------------------|
| PC Work Session | Public Facilities and Community Services | August 19, 2013 |
| CC Work Session | TSP, Land Use, Comp. Plan Text | June 24, 2013 |
| PC Hearing | Public Facilities, Schools, Natural Hazards and Resources, | December 2, 2013 |
| PC Work Session | Public Facilities and Urbanization | July 18, 2011 |
| PC Hearing | Land Use Inventory, BLI, Wetland Inventory, EOA | November 7, 2011 |
| PC Work Session | Periodic Review Work Program Review | October 3, 2011 |
| CC Work Session | Water Master Plan, EOA Resolution | August 23, 2010 |
| CC Work Session | EOA Update | February 11, 2011 |
| PC Work Session | Periodic Review Update – Results | September 20, 2010 |

| | | |
|--------------------------------------|---|--------------------|
| | of Community Open House | |
| PC Work Session | Housing | October 18, 2010 |
| PC Work Session | Economic Development | November 1, 2010 |
| PC Work Session | Land Use Inventory Buildable Land Inventory | October 4, 2010 |
| PC Work Session | Economic Development | January 3, 2011 |
| PC Work Session | Economic Development | February 21, 2011 |
| PC Work Session | TSP Update | April 1, 2013 |
| CC Work Session | Comp. Plan Update TSP Update | June 24, 2013 |
| CC Public Hearing | Adoption of EOA | August 23, 2010 |
| PC Work Session | Downtown Planning Public Facilities Element | August 19, 2013 |
| PC Work Session | TSP Update Comp. Plan Land Use Concept | May 20, 2013 |
| PC Work Session | Land Use and Transportation Policy Framework and Evaluation Criteria | September 17, 2012 |
| CC Public Hearing | Acceptance and Approval of Land Use Inventory, BLI and Development Capacity Estimates, Wetland Inventory Update and EOA | November 28, 2011 |
| Economic Development Commission | Economic Development Element | March 3, 2011 |
| PC Work Session | Community Sustainability | March 7, 2011 |
| PC Work Session | Economic Development | February 7, 2011 |
| | Newsletter | March 2009 |
| Sustainability Committee | Community Sustainability | April 26, 2012 |
| Committee for Citizen Involvement | Periodic Review Work Program | April 14, 2009 |
| Committee for Citizen Involvement | Periodic Review Work Program | May 12, 2009 |
| CC Work Session | EOA | January 12, 2009 |
| Washington County Cities | EOA and Housing Needs | March 5, 2009 |
| PC Work Session | Land Use Alternatives | March 5, 2012 |
| PC Hearing | Comp Plan Land Use | November 4, 2013 |
| PC Hearing | TSP | November 18, 2013 |
| PC Hearing | Public Facilities | December 2, 2013 |
| PC Hearing | Growth Projections | December 16, 2013 |
| Newspaper Insert | Planning Assumptions | Summer 2010 |
| Newspaper Insert | Land Use Alternatives | Summer 2012 |
| Project Website | | |
| Open Houses | | |

In addition to the meetings identified above opportunities for public involvement included meetings with the City's Advisory Boards and Commission, advertisements placed within the Forest Grove News Times and outreach at the Forest Grove Farmers Market.

Goal 2 (Land Use Planning): The purpose of Goal 2 is to establish a land use planning process and policy framework as a basis for all decision and actions related to the use of land and to assure an adequate factual base for such decisions and actions.

Analysis: Goal 2 outlines the basic procedures of Oregon's statewide planning program. Under Goal 2 local decisions and actions related to the land use planning program must be based on an adequate factual base. Under Goal 2 land use decisions must be made in accordance with a comprehensive plan, and suitable "implementation ordinances" to put the plan's policies into effect must be adopted.

Goal 2 requires that plans be based on factual information, that local plans and ordinances be coordinated with those of other jurisdictions and agencies; and that plans be reviewed periodically and amended as needed. The Comprehensive Plan is based on factual information including:

- Wetlands Inventory (1990s and 2011 review) – Meets requirements for inventory of natural resources, their capabilities and limitations.
- Buildable Lands Inventory
- Residential land study including review of subdivision activity for compliance with the Metropolitan Housing Rule.
- Land Use Inventory (2011) – Meets requirement for man-made structures and utilities, and their location.
- Economic Opportunity Analysis (2009)
- Water Master Plan
- Sewer Master Plan
- Storm Drainage Master Plan
- Transportation Plan Update (2010 and 2014)
- Clean Water Services

- Identification of "implementing ordinances"
 - Forest Grove Development Code
 -

- Identification of factual information
 - Buildable Land Inventory (2009 and 2010)
 - Residential Land Study (2009)
 - Building Permit Files
 - Economic Opportunity Analysis
 - Land Use Inventory (2011)
 - Metro Gamma Household and Employment Projections (2012)
 - Transportation System Plan 2013
 - Water Master Plan 2010
 - Substation Master
 - Sanitary Sewer Master Plan
 - Clean Water Services Master Plan
 - Metro Solid Waste Master Plan
 - Storm Drainage Master Plan
 - Portland State University Population Estimates
 - Wetland Inventory
 - Wetland Inventory Update
 - Historic Resource Inventory (City of Forest Grove Planning Division)

The Forest Grove Comprehensive Plan establishes a planning process and policy framework as the local basis for all decisions and actions related to the use of land within the Forest Grove planning area. The Forest Grove Comprehensive Plan Update establishes a planning program including an objective process for amending the Comprehensive Plan. The Comprehensive Plan also establishes specific goals and policies for citizen involvement, land use housing, economic development, transportation, urbanization, natural resources and hazards, public facilities and community services, community sustainability, and schools and education.

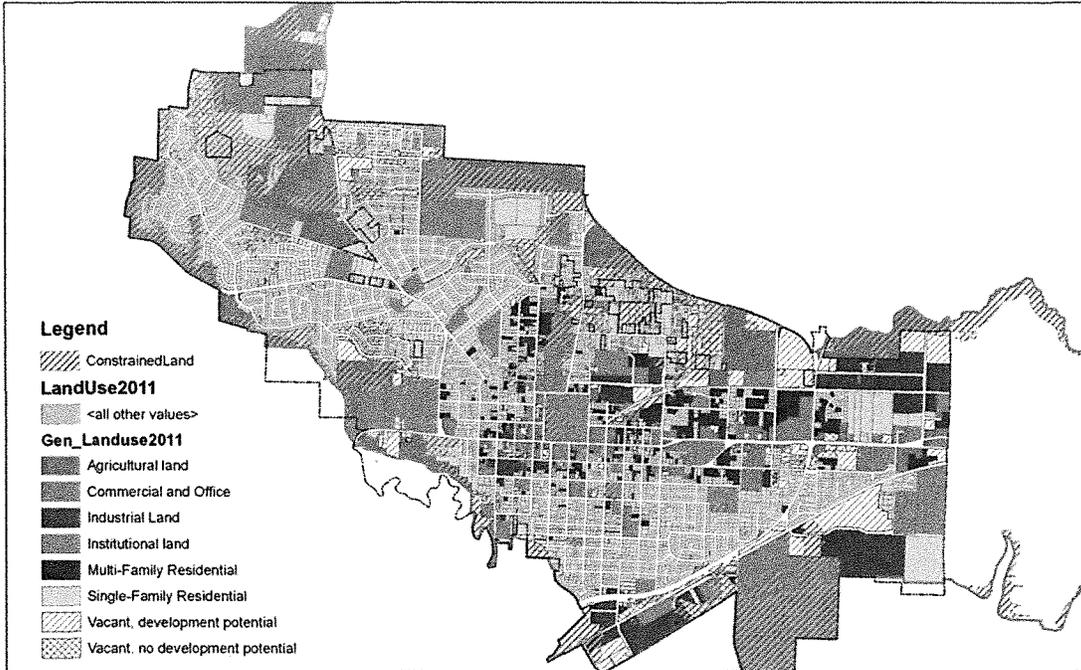
The land use chapter of the Comprehensive Plan establishes location criteria for the various land use designations assigned to property. The Comprehensive Plan also establishes density targets for each of the residential land use categories identified in the Comprehensive Plan. These residential density targets promote the efficient use of residential land within the urban growth boundary consistent with the Statewide Land Use Planning Goals, Metro Regional Framework Plan, Metro Urban Growth Management Functional Plan and urbanization chapter of the Forest Grove Comprehensive Plan.

The land use chapter of the Comprehensive Plan, including the Comprehensive Plan Map, ensures that there is a 20-year supply of vacant and redevelopable land within the urban growth boundary consistent with the statewide land use planning goals. Specific data related to land supply and land needs over the next twenty-years are contained in the 2009 Economic Opportunity Analysis.

The Forest Grove Comprehensive Plan is based on many resource documents incorporated by reference. The documents provide the factual basis for the policies contained in the various chapters of the Forest Grove Comprehensive Plan. These resource documents include:

1. City of Forest Grove Vision Statement (2007)
2. Economic Opportunity Analysis (2009)
3. Buildable Land Inventory (2008/2009)
4. Land Use Inventory (2011)
5. Wetland Inventory Update (2011)
6. City of Forest Grove Water Master Plan (2010)
7. City of Forest Grove Storm Drainage Master Plan (2007)
8. Park, Recreation and Open Space Master Plan (2002)
9. City of Forest Grove Wastewater System Master Plan (2007)
10. Clean Water Services Master Plan (2009)
11. City of Forest Grove Light and Power Master Plan (2013)
12. City of Forest Grove/Cornelius Hazard Mitigation Plan (2011)
13. Metro Regional Solid Waste Management Plan (2008-2018)
14. City of Forest Grove Capital Improvement Program
15. Metro Gamma Household and Employment Projections (September 2012)
16. City of Forest Grove Community Sustainability Strategy (2013)
17. City of Forest Grove Transportation System Plan Update (2014)
18. City of Forest Grove Historic Resources Inventory (2013)

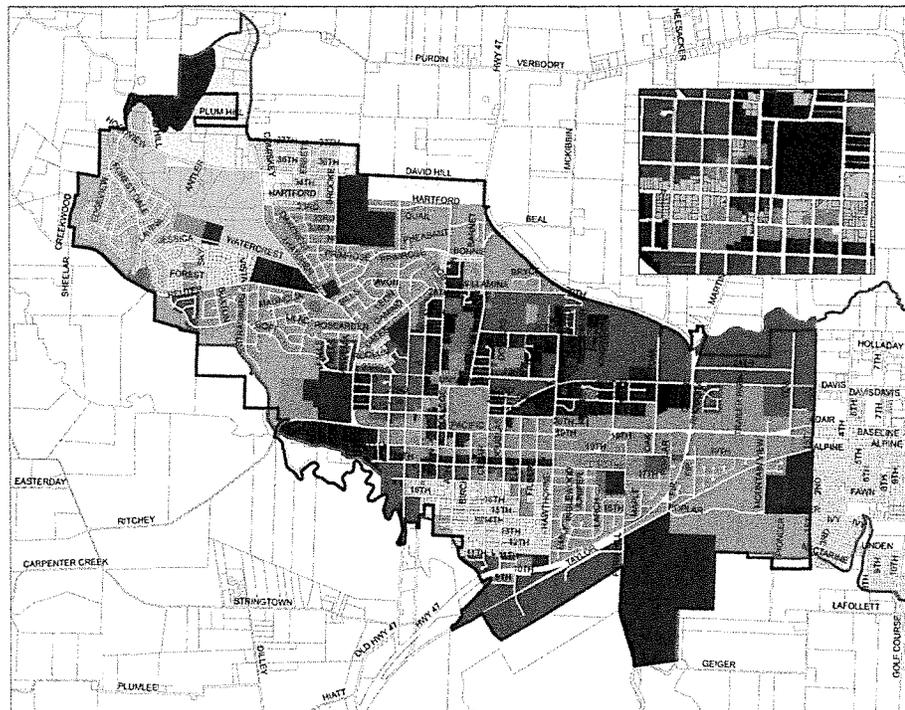
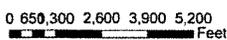
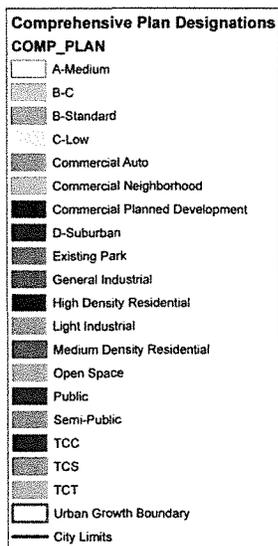
The map below shows the land use inventory that serves as the basis for the update to the Comprehensive Plan.



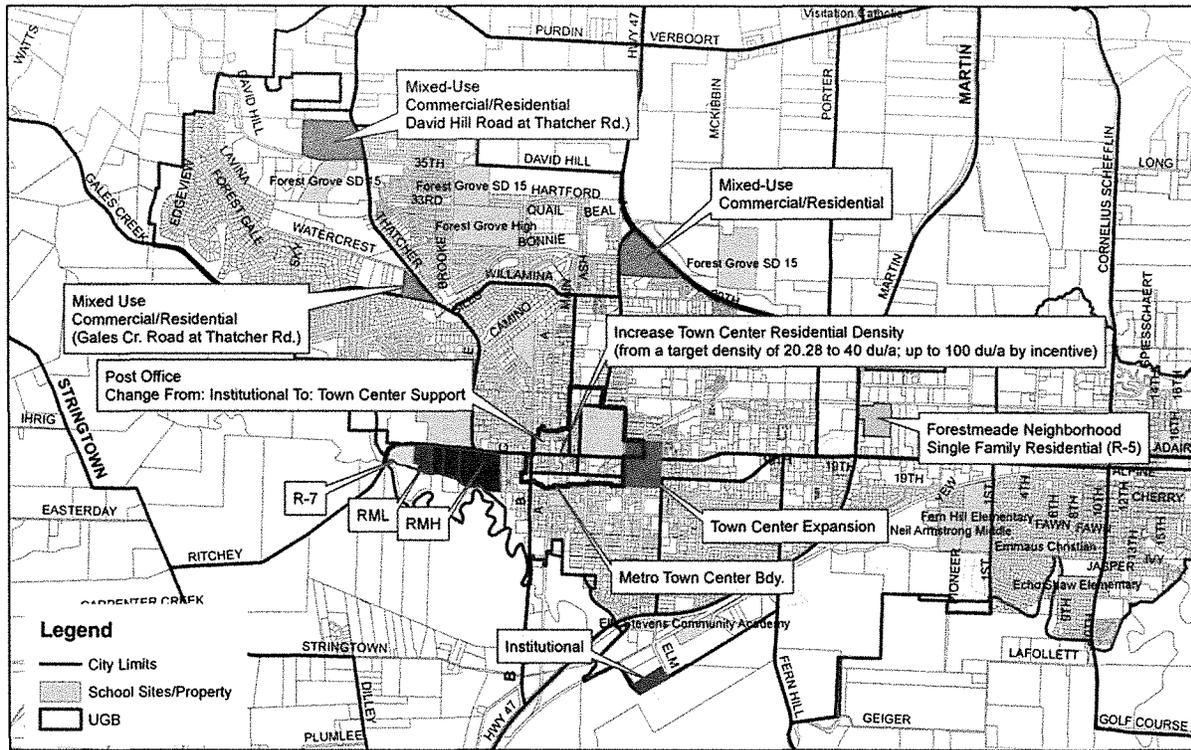
The map below shows the current comprehensive plan map.



City of Forest Grove Comprehensive Plan Designations



The map below shows the recommended changes to the Comprehensive Plan map.



**city of
forest
grove**

**PLANNING COMMISSION RECOMMENDATION
Comprehensive Plan
Land Use Concept**

The Comprehensive Land Use Chapter and land use concept is consistent with the Metro Regional Framework Plan since the land use plan reinforces the Forest Grove Town Center and promotes a compact development form consistent with Metro Regional Framework Plan Land Use Policy 1.1. Furthermore, the land use plan promotes housing choice and economic vitality consistent with Metro Regional Framework Plan Land Use Policies 1.3 and 1.5.

The land use plan is also consistent with the Metro Urban Growth Management Functional Plan. The land use plan supports housing choice through establishment of a variety of residential land use designations. The land use plan promotes land efficient development by establishing target development densities in the Land Use Chapter of the Comprehensive Plan. The land use plan also promotes a strong local economy by designating sufficient amounts of land for industry and employment consistent with the Economic Opportunity Analysis.

Finding: The update to the Comprehensive Plan is consistent with Goal 2 for the reasons stated above. Furthermore, the land use concept and Land Use Chapter of the Comprehensive Plan is consistent with the Metro Regional Framework Plan and Metro Urban Growth Management Functional Plan.

Goal 3 (Agricultural Lands): The purpose of Goal 3 is to preserve and maintain agricultural lands within the state.

Analysis: The Comprehensive Plan establishes a land use framework and growth management/urbanization program that serves to conserve agricultural lands by ensuring the efficient use of

land within the urban growth boundary. The efficient use of land within the urban growth boundary is achieved through the establishment of specific land use districts including location criteria and density parameters. For these reasons, the revised Forest Grove Comprehensive Plan is consistent with Goal 3.

Finding: The Comprehensive Plan is consistent with Goal 3 (Agricultural Lands)

Goal 4 (Forest Lands): The primary purpose of Goal 4 is to conserve forest lands by maintain the forest base and to protect the forest economy.

Analysis: The Comprehensive Plan establishes a land use framework and growth management/ urbanization program that serves to conserve forest lands by ensuring the efficient use of land within the urban growth boundary. The efficient use of land within the urban growth boundary is achieved through the establishment of specific land use districts including location criteria and density parameters. For these reasons, the revised Forest Grove Comprehensive Plan is consistent with Goal 4.

Finding: The Comprehensive Plan is consistent with Goal 4 (Forest Lands).

Goal 5 (Natural Resources, Scenic and Historic Areas, and Open Spaces): The primary purpose of Goal 5 is to protect natural resources and conserve scenic and historic areas, and open spaces.

Analysis: The Comprehensive Plan addresses natural resources in the Natural Resources and Natural Hazards chapter of the plan. Historic resources are addressed in the Public Facilities and Community Services Chapter of the Comprehensive Plan. Parks and open space are also addressed in the Public Facilities and Community Services Chapter of the Comprehensive Plan and in the Parks, Recreation and Open Space Master Plan which is a resource document to Comprehensive Plan. Natural resources were also addressed through the update of the City's local wetland inventory in 2011.

Finding: The Comprehensive Plan is consistent with Goal 5 (Natural Resources, Scenic and Historic Areas, and Open Spaces).

Goal 6 (Air, Water and Land Resource Quality): The primary purpose of Goal 6 is to maintain and improve the quality of the air, water, and land resources of the state.

Analysis: This goal is addressed in several chapters of the Comprehensive Plan. These chapters include the Land Use Chapter, Public Facilities and Community Services, and Natural Resources and Natural Hazards Chapter, and Transportation Chapter.

The Land Use Chapter of the Comprehensive Plan establishes a land use framework which promotes efficient use of land within the urban growth boundary and a compact development pattern consistent with the Metro Regional Framework Plan. The Land Use Chapter establishes target residential densities, location factors for land use activities to promote a multi-modal transportation system including transit. A land-efficient, compact residential land use pattern serves to improve air quality by reducing vehicle miles traveled and pollution generated by automobiles.

The Natural Resources and Natural Hazards Chapter of the Comprehensive Plan also addresses air and water quality. The Natural Resources and Natural Hazards Chapter of the Comprehensive Plan includes information regarding the air quality surveillance network near Forest Grove. Monitoring stations include Hillsboro, Beaverton, ad Sherwood. Water Quality is also addressed in the Natural Resources and Natural Hazards Chapter of the Comprehensive Plan. Water resources in Forest Grove include Clear Creek Watershed, Gales Creek, Scoggins

Reservoir/Henry Hagg Lake; Tualatin River, local wetlands, and groundwater. The local wetland inventory was updated in 2011 to ensure that no isolated wetlands were missed in previous inventories. The wetland inventory was reviewed using current Lidar imagery. The Natural Resources and Hazards Chapter of the Comprehensive Plan also recognizes the location of defined vegetative corridors and the importance of such corridors in improving water quality.

Finding: The Comprehensive Plan is consistent with the Goal 6 (Air, Water and Land Resource Quality).

Goal 7 (Areas Subject to Natural Hazards): The primary purpose of Goal 7 is to protect people and property from natural hazards.

Analysis: The Forest Grove Comprehensive Plan addresses Goal 7 specifically in the Natural Resources and Natural Hazards Chapter of the Comprehensive Plan. The Natural Resources and Natural Hazards Chapter identifies the locations within the community at risk for seismic activities including the location of known fault lines. The Natural Resources and Natural Hazards Chapter of the Comprehensive Plan also addresses flood and landslide risk. Furthermore, the Natural Resources and Natural Hazards Chapter addresses wildfire risk associated with the wildland/urban interface. Finally, the Natural Resources and Natural Hazards Chapter contains goals and policies to reduce potential risk associated with natural hazards.

Finding: The Comprehensive Plan is consistent with the purpose of Goal 7 (Areas Subject to Natural Hazards) and Metro Urban Growth Management Functional Plan for the reasons stated above.

Goal 8: (Recreational Resources) The primary purpose of Goal 8 is to satisfy the recreational needs of the citizens of the state and visitors and, where appropriate, to provide for the siting of necessary recreational facilities including destination resorts.

Analysis: The Forest Grove Comprehensive Plan addresses recreational needs in the Public Facilities and Community Services chapter of the Comprehensive Plan and on the Comprehensive Plan map. The Public Facilities and Community Services Chapter lists the park facilities in Forest Grove including parks owned and operated by the City of Forest Grove. In addition, the Public Facilities and Community Services Chapter includes recreational facilities available at school sites, and recreational amenities provided by state and county agencies. The Public Facilities and Community Services Chapter also identifies park need and facility criteria. Finally, the Comprehensive Plan incorporates by reference the Park, Recreation and Open Space Master Plan adopted by the City in 2002.

Finding: The Comprehensive Plan is consistent with Goal 8.

Goal 9: Economic Development The primary purpose of Goal 9 is to provide adequate opportunities throughout the state for a variety of economic activities vital to the health, welfare and prosperity of Oregon's citizens.

Analysis: The Comprehensive Plan includes a chapter called Economic Development which addresses the requirements of Goal 9 and the implementing Oregon Administrative Rules. The Economic Development chapter is based on the data and findings contained in the City's 2009 Economic Opportunity Analysis. The Economic Development chapter includes the following sections:

1. Overview of state and regional policies affecting economic development efforts;

2. An economic profile for the City of Forest Grove and discussion of Forest Grove's role in the Portland region;
3. Findings related to economic development based on the 2009 Economic Opportunity Analysis; and
4. Goals and policies for local economic development.

Goal 9 calls for diversification and improvement of the economy. It asks communities to inventory commercial and industrial lands, project future needs for such lands, and plan and zone enough land to meet those needs. To meet this requirement the City prepared a Buildable Land Inventory in 2008 and Economic Opportunity Analysis in 2009. In addition, the City prepared an inventory of commercial and industrial lands in 2011 as part of a comprehensive land use inventory to supplement the BLI. The Economic Opportunity Analysis addresses future needs and identifies the amount of land needed for commercial and industrial purposes during the twenty-year planning period. The Planning Commission adopts the Buildable Land Inventory and capacity analysis completed by the City. Furthermore, the Planning Commission adopts the 2009 Economic Opportunity Analysis including the findings and conclusions contained therein.

Oregon Administrative Rules Chapter 660 Division 9 establishes requirements related to compliance with Goal 9.

OAR 660-009-015 (Economic Opportunity Analysis) identifies requirements for an Economic Opportunity Analysis. The requirements include:

- (1) Review of National, State, Regional, County and Local trends
 - This requirement is addressed on EOA pages 4 through 17
- (2) Identification of Required Site Types
 - This requirement is addressed on EOA pages 41 through 51
- (3) Inventory of Industrial and Other Employment Lands
 - This requirement is addressed on EOA pages 33 through 38
- (4) Assessment of Community Economic Development Potential
 - This requirement is addressed on EOA pages 17 through 20

OAR 660-009-0020 (Industrial and Other Economic Development Policies) states Comprehensive plans subject to this division must include policies stating the economic development objectives for the planning area. These policies must be based on the community economic opportunities analysis prepared pursuant to OAR 660-009-0015 and must provide Community Economic Development Objectives. The Economic Development Chapter includes stated community economic development objectives (Economic Development Chapter pages 28 through 31). Furthermore, OAR 660-009-0020 states comprehensive plans must include a Commitment to provide a competitive short term supply of employment land. To comply with this section cities and counties within a metropolitan planning organization must adopt a policy stating that a competitive short-term supply of land as a community economic development objective for the industrial and other employment uses selected through the economic opportunities analysis pursuant to OAR 660-009-0015. Local Economic Development Goal 9.4 addresses industrial activities and industrial land needs through Policy 9.4.6. OAR 660-009-0020 also states the comprehensive plan must include policies committing the city or county to designate an adequate number of sites of suitable sizes, types and locations. The Economic Opportunity Analysis identifies industrial land needs. The Economic Development Chapter of the Comprehensive Plan establishes goals and policies related to the amount of land that should be designated on the Comprehensive Plan map for industrial activities.

OAR 660-009-0025 (Designation of Lands for Industrial and Other Employment Uses) states cities and counties must adopt measures adequate to implement policies adopted pursuant to

OAR 660-009-0020. Appropriate implementing measures include amendments to plan and zone map designations, land use regulations, public facility plans, and transportation system plans. The Land Use Element of the Comprehensive Plan establishes land use designations and location criteria for General Industrial and Light Industrial land use classifications. The Comprehensive Plan map identifies the locations of these classifications.

Additional Findings Related to Economic Development

Finding 1: Forest Grove has a substantially lower presence of persons receiving a higher education compared with Washington County

Analysis: An area's level of educational attainment is often used as a proxy for the skill level of the population base. From an Economic Development perspective, Washington County is at a slight competitive advantage regionally, with a higher distribution of higher educated persons—36.6% of local residents have a Bachelor's Degree or higher as compared to 34.7% at the Portland metro level. The City of Forest Grove has a 22.1% share of higher educated local residents according to the 2000 census. This is substantially less than the regional share and that of neighboring job centers, namely Hillsboro. This highlights concerns locally about the extent to which the local skill base matches the needs of high growth industry opportunities.

Finding 2: From 2002 to 2007, employment growth in Washington County remained strong

Analysis: Since 2002, total employment growth in Washington County remained strong, gaining 11.3%. The county's growth cycle, which began in late 2003, maintained momentum until early 2007. While the County is still demonstrating employment growth, it is measurably slower. Moreover, the slowing is expected to extend through early to mid-2009 and impact most industries.

Finding 3: Economic activity in Washington County diverges from overall activity at the regional and state levels.

Analysis: The largest sectors of the Washington County economy diverge somewhat from sector rankings of the State and metro area. For example, Manufacturing accounts for 19% of Washington County's economy whereas the share is nearly 12% at the State and metro area. On the other hand, Public Administration accounts for a correspondingly large share at the State (16.8%) and metro area (12.7%), but only an 8.5% share in Washington County. Portland metro and Washington County both have a relatively greater share of Professional & Business Services employment, 13.6% and 14.0%, respectively while the overall State share is 11.4%. However, in other sectors Washington County's employment share is roughly similar to State and metro levels.

Finding 4: Forest Grove's economic activity is characterized by manufacturing and the Education and Health Services sector.

Analysis: The City of Forest Grove generally adheres to Washington County's sector rankings, but is overwhelmingly driven by Manufacturing and Education & Health Services, which combine to account for over 60% employment in the City.

Finding 5: Overall job growth in Forest Grove grew modestly between 2002 and 2007.

Analysis: Between 2002 and 2007, the City of Forest Grove's employment grew roughly 4.3%. Over this five-year period, the City experienced its strongest job growth in Manufacturing (+143 jobs) and Education & Health Services (+80 jobs). Forest Grove lost roughly 140 jobs in Natural Resources, Information and Professional & Business Services combined.

Finding 6: Wage levels in Washington County exceed wage levels in the Portland region and the state.

Analysis: With the exception of Public Administration, Leisure & Hospitality Services, Professional & Business Services and Financial Activities, average wage levels by sector in Washington County are at or above wage levels in the Portland metro area. Across all industries, Washington County wages averaged \$50,036, again 11.0% above the Portland metro \$45,090 average and 31.5% above the \$38,057 Oregon average. Since 2002, wage levels in Washington County have averaged 2.9% annual growth, slightly below the 3.3% annual growth at the State level. Similarly, at 3.2%,

Finding 7: Wage levels in Forest Grove lag behind Washington County and Portland regional averages.

Analysis: Forest Grove has remained roughly consistent with State wage growth. However, in 2007, the average wage in Forest Grove was \$33,732, well below the Washington County and Portland area averages.

Finding 8: High-tech represents a significant part of the Forest Grove economy.

Analysis: According to the City's economic opportunity analysis, the concentration of employment in High-Tech in Forest Grove is better than 15 times the national average. While circuit board manufacturing is a significant part of the existing local economy, its share of growth is not likely to be high. High-tech growth in Forest Grove is likely to result from firms that are connected to the cluster of high-tech industries centered in Hillsboro. Given Forest Grove's proximity to Hillsboro, the City is in a good position for capturing economic growth in semiconductor and solar component manufacturing.

Finding 9: Forest Grove's proximity to high quality farmland is an economic asset.

Analysis: The proximity of Forest Grove to high quality farmland and the City's quality water supply has created opportunities for growth in food processing and specialty agriculture products. The city already has an existing economic base in food processing (J Lieb Foods), nursery & tree products (Hines Nursery), and specialty beverages (Sake One, McMenamins, wineries). A specialty agriculture products cluster could develop as growth opportunities exist in this area. Moreover, the nature of Forest Grove's specialty products—breweries, wineries, distilleries, etc. is closely related with leisure & tourism in the region.

Finding 10: Tourism is underdeveloped in Forest Grove

Analysis: The City of Forest Grove is currently undertaking efforts to "brand" the city, giving it a regional identity. The concept of Forest Grove as a "Gateway to Wine Country" is a popular option, facilitated both by Forest Grove's proximity to the metro area and by abundant outdoor recreation activities. Central to the development of Forest Grove's tourism industry is a proposed partnership between McMenamins Grand Lodge and the Washington County Visitors Association (WCVA). The partnership would see the development of the "North Willamette Valley Wine Center" on the Grand Lodge property in Forest Grove. The center would feature an expansion of additional and more amenitized hotel rooms, potential convention facilities, and tasting facilities for regional wine makers.

Finding 11: Pacific University is an economic asset to the community and anchor for the Forest Grove Town Center

Analysis: While employment in public education can be expected to grow commensurately with family households in the region, broader growth in the education sector will be born out of Pacific University. The school is currently in an expansionary phase. In 2005 the school complete an \$11 million LEED certified library, and new residence halls were completed in 2006 and 2008. In spring 2008, the University completed Berglund Hall, which now houses the School of Education. Employment at Pacific University (in Forest Grove) has grown by nearly 20% since 2002. The schools 2010 strategic plan outlines a goal to increase enrollment to 4,000 students, up from roughly 3,100 currently.

Finding 12: Health services is a major employment sector in Forest Grove

Analysis: Four of the City's top 25 employers are nursing care or elderly home facilities. Forest Grove's composition of employment in Nursing and Residential Care Facilities is nearly three times the national average.

Finding 13: The estimated 2008 total employment level in Forest Grove is approximately 9,092 employees.

Analysis: For the year 2007, ES-202 reports estimate employment in Forest Grove to total 7,425 employees. However, our source ES-202 data reports "covered employment" only—employer firms tracked through unemployment insurance. Because this data omits a significant portion of the workforce that are not covered (i.e. sole-proprietors, self-employed, commission workers) we must revise our estimates to reflect true employment. Estimates from the Bureau of Economic Analysis (BEA) indicate that covered employment accounts for approximately 85% of total employment in Washington County, with individual estimates reported by broad sector. Assuming that Forest Grove roughly tracks regional trends, we estimate the *total* employed level in 2007 to be in the area 9,296 employees.

The second step to creating our base year estimate is updating our 2007 total employment estimate to the current period. This process involves the evaluation of countywide economic trends between 2007 and 2008 in addition to current knowledge about the local economic activity in Forest Grove. Outlined in Figure 14, we assume that between 2007 and 2008 the Forest Grove economy contracted slightly, by a margin of -2.2% to 9,092 employees.

Finding 14: The baseline employment forecast projects an increase of 5,748 jobs in Forest Grove during the next twenty-years.

Analysis: The baseline employment forecast anticipates an increase of 5,748 jobs, reflecting an average annual growth rate of 2.5%. Significant employment gains are expected in existing employment sectors including Manufacturing and Education & Health Services. Currently, the Professional & Business Services sector is grossly underrepresented in the Forest Grove economy, with an employment density for the sector roughly 20% of the national average. These services, which include everything from law services and administration to waste remediation are likely being provided by regional firms outside of Forest Grove, namely Hillsboro and Portland. Over the course of the planning period, we expect the maturation of the Forest Grove economy and potential spillover effects from on-going economic growth regionally to produce noteworthy growth in professional services on the margin.

Finding 15: Forest Grove growth potential is estimated to create demand for between 56 and 71 acres of office commercial land.

Analysis: The City currently has approximately 2.3 acres of vacant buildable acres suitable for office commercial development. All of the acreage is in the small category and located in the Town Center.

Finding 16: Over the next twenty years, net new demand for commercial and industrial land is expected to range from 311 to 451 net buildable acres.

Analysis: The EOA projects that Forest Grove will need between 311 and 451 acres of net buildable land for commercial and industrial activities. In 2009, approximately 321 acres of net vacant land remains in the Forest Grove portion of the regional urban growth boundary.

Finding 17: Forest Grove growth potential is estimated to create demand for between 56 and 71 acres of office land. Although demand is not sufficient for a single typical, 50-acre Business Park site, Business Park development is estimated as the largest category of demand among the three office space classes. Given documented site demand and existing inventory, Forest Grove will require at least 53.5 acres and as many as 68.4 acres of office commercial land to meet economic need over the next twenty years.

Analysis: Currently, Forest Grove has no site availability suitable for larger office park development outside the Town Center.

Finding 18: Forest Grove economic growth is expected to generate demand for a minimum of 164 industrial acres to as many as 294 acres through 2028.

Analysis: Although the EOA shows individual site demand has the greatest count in the "Small Businesses" category, total acreage demand is highest in the "Large User or Mid Park" class. In general, there is sufficient industrial land capacity within the urban growth boundary to meet projected 20-year needs in all categories except Cluster Anchor. With a proactive economic development approach, however, demand for industrial land could exceed identified supply by approximately 48 acres over the twenty-year planning period.

Finding 19: Forest Grove demand for commercial acreage is estimated to range from 97 acres to 142 acres depending upon economic growth scenario.

Analysis: Medium sites, typically 10 acres in size, comprise the largest single share of acreage demand during the planning period. Given documented site demand and existing inventory, Forest Grove will require anywhere from 66 to 111 additional acres to meet the needs of anticipated population growth through 2028. Unmet commercial retail land need is most concentrated in Medium-sized retail demand, followed by large retail commercial types.

Finding 20: There appears to be an overall surplus of available industrial land and a deficiency of commercial land both for short-term and through the planning period.

Analysis: Industrial land for the planning period varies from an excess of 88.14 acres to a need of 24.56 acres, depending on the assumed growth scenario. By comparison, commercial land for the planning period is projected to have a need of 121.06 to 181.96 acres. The pattern is similar for the short term. Applying the short-term land need factor from the State Administrative Rule, there appears to be an oversupply of 94 acres and an undersupply of 26 acres for commercial use.

Part of the commercial need for office development could be met in the City's Light Industrial District, which allows for call centers, research and development and information type of uses. There exists about 70 acres of vacant lands (three sites) currently zoned and planned for Light Industrial designation. Thus, there may not be a need to convert industrial land to commercial lands due to the flexibility of the Light Industrial District and plan designation as it currently exists.

The Economic Development Chapter and Economic Opportunity Analysis are consistent with Title 4 of the Metro Urban Growth Management Functional Plan. The Economic Development Chapter promotes a strong local economy which supports a strong regional economy consistent with the Title 4.

Finding: For the reasons stated above the Forest Grove Comprehensive Plan complies with Statewide Land Use Planning Goal 9, Metro Regional Framework Plan and Metro Urban Growth Management Functional Plan.

Goal 10: Housing The primary objective of Goal 10 is to provide for the housing needs of the citizens of the state.

Analysis: Local housing needs are based on the household growth projects prepared by Metro. These projects are based on the buildable land inventory and capacity analysis provided by the City and refined by Metro. Based on these projections the 2030 population estimate for Forest Grove is 28,100 persons as shown below. The estimate was derived from the Metro Gamma (September 2012) household estimates for 2025 and 2035 and the average number of persons per household in Forest Grove for the Year 2010 as reported by the US Census Bureau of 2.71 persons per household. The population assumptions for the Forest Grove Comprehensive Plan are indicated below:

Population Assumptions

- Base-year population used to develop the plan was 20,068 persons from the 2010 Census.
- 2013 Population is 22,340¹
- 2030 Planning Year Horizon Population is 28,100²

Household Estimates

1. Based on the Metro household projections released in September 2012, the City of Forest Grove should expect and plan for an additional 2,963 housing units during the 20-year planning period from 2010 to 2030.
2. Based on the City of Forest Grove Buildable Land Inventory, Forest Grove Economic Opportunity Analysis, and Metro land capacity estimates the residential development capacity for the Forest Grove Planning Area (urban growth boundary) is 4,800 units. This number takes into account the amount of vacant buildable land and redevelopment capacity.
3. Based on the Metro household growth projections and estimated residential land capacity there is sufficient land within the urban growth boundary to accommodate housing needs during the 20-year planning period from 2010 to 2030.

Metropolitan Housing Rule (OAR Chapter 660 Division 7)

- Compliance with Metropolitan Planning Rule related to average density (provide opportunity to meet 8 units per acre. Finding: Under the Metropolitan Housing Rule

¹ Center for Population Research and Census, Portland State University, July 1, 2013

² This population estimate is based on the Metro Gamma household projections for 2025 and 2035 released in September 2012. The population estimate is based on extrapolating a 2030 household number from the Metro estimates and applying a factor of 2.71 persons per household to the unit estimate. 2.71 persons per household is the average persons per household from the 2010 US Census. This population estimate is conservative given recent trends in population growth in Forest Grove since 2010.

(OAR 660-007-0035(2) the City of Forest Grove must provide for an overall density of eight or more dwelling units per net buildable acres. The Forest Grove Comprehensive Plan establishes a minimum number of dwelling units for each Comprehensive Plan designation. In addition, the Comprehensive Plan contains policies to encourage higher density residential development within the Town Center. Combined the policies serve to provide for an overall density of 8 dwelling units per net acre within the planning area. Historical trends suggest the City is achieving the 8 dwellings per net acre requirement³.

Determination of Residential Land Need

The determination of 20-year residential land needs for an urban area must be consistent with the adopted 20-year coordinated population forecast for the urban area, and with the requirements for determining housing needs in Goal 10.

The residential land needs for the City of Forest Grove is based on the coordinated population forecast derived from the city level household estimates prepared by Metro in September 2012. Housing needs are based on the Metro households estimates and Goal 10 housing analysis prepared by Johnson-Reid as part of the City's adopted 2009 Economic Opportunity Analysis. The analysis from the EOA identifies the following housing needs:

COMPARISON OF CURRENT NEED TO CURRENT SUPPLY

| Ownership | | | | Rental | | | |
|--------------------|-------------------------------|---------------------------------|--------------------------------|-----------------|-------------------------------|---------------------------------|--------------------------------|
| Price Range | Estimated Current Need | Estimated Current Supply | Unmet (Need) or Surplus | Rent | Estimated Current Need | Estimated Current Supply | Unmet (Need) or Surplus |
| \$0 - 50k | 211 | 416 | 205 | \$0 - 250 | 469 | 40 | (429) |
| \$50k - 70k | 135 | 156 | 21 | \$250 - 375 | 289 | 138 | (151) |
| \$70k - 90k | 137 | 156 | 18 | \$375 - 500 | 240 | 163 | (77) |
| \$90k - 120k | 143 | 157 | 14 | \$500 - 625 | 271 | 933 | 662 |
| \$120k - 160k | 432 | 390 | (42) | \$625 - 875 | 396 | 1,163 | 767 |
| \$160k - 230k | 701 | 1,462 | 762 | \$875 - 1,250 | 497 | 642 | 145 |
| \$230k - 350k | 1,085 | 1,027 | (58) | \$1,250 - 1,875 | 601 | 330 | (271) |
| \$350k - 460k | 779 | 315 | (464) | \$1,875 - 2,500 | 133 | 82 | (51) |
| \$460k - 690k | 656 | 147 | (510) | \$2,500 - 3,750 | 48 | 0 | (48) |
| \$690k + | 195 | 52 | (143) | \$3,750 + | 0 | 0 | 0 |
| Totals: | 4,474 | 4,278 | (196) | Totals: | 2,945 | 3,490 | 546 |

| | |
|----------------------------|--------------|
| Occupied Units: | 7,419 |
| All Housing Units: | 7,768 |
| Total Unit Surplus: | 350 |

³ See Residential Land Study (2009)

FIGURE 39: FUTURE HOUSING PROFILE (2028)

| | Baseline Growth Scenario | Medium Growth Scenario | High Growth Scenario |
|---|---------------------------------|-------------------------------|-----------------------------|
| 2008 Population*: | 19,882 | 19,882 | 19,882 |
| Annual Growth Rate: | 2.0% | 2.3% | 2.6% |
| <i>Estimated 2028 Population*:</i> | 29,394 | 31,504 | 32,916 |
| <i>Estimated 2028 Households:</i> | 10,968 | 11,755 | 12,282 |
| <i>Total Housing Units:</i> | 11,668 | 12,506 | 13,066 |
| Occupied Housing Units: | 10,968 | 11,755 | 12,282 |
| Vacant Housing Units: | 700 | 750 | 784 |
| New Population ('08-'28): | 9,512 | 11,622 | 13,034 |
| New Households ('08-'28): | 3,549 | 4,337 | 4,863 |
| New Housing Units ('08-'28) ¹ | 3,900 | 4,737 | 5,298 |

* Does not include Group Quarters population.

¹ New Housing Units = Total housing units, occupied and vacant.

To be conservative in estimating deficiencies related to supply and demand, the City of Forest Grove chose the medium growth scenario which is slightly higher than historical growth trends.

The table below from the EOA shows the projected future needs for new housing units under the medium growth scenario.

PROJECTED FUTURE NEED FOR NEW HOUSING UNITS (2028 – MEDIUM GROWTH SCENARIO)

| OWNERSHIP HOUSING | | | | | | | | | |
|--------------------|---------------|-------------|--------------|--------------|-------------|-----------------|---------------|---------------------|---------------|
| Price Range | Single Family | Duplex | 3- or 4-plex | 5+ Units MFR | Mobile home | Boat, RV, other | Total Units | % of Units | Cummulative % |
| \$0 - 50k | -52 | 10 | 8 | 6 | 0 | 0 | -28 | -0.7% | -0.7% |
| \$50k - 70k | 39 | 6 | 5 | 3 | 0 | 0 | 53 | 1.4% | 0.6% |
| \$70k - 90k | 57 | 7 | 5 | 4 | 0 | 0 | 72 | 1.9% | 2.5% |
| \$90k - 120k | 65 | 7 | 5 | 4 | 0 | 0 | 82 | 2.1% | 4.6% |
| \$120k - 160k | 232 | 21 | 15 | 11 | 0 | 0 | 280 | 7.2% | 11.9% |
| \$160k - 230k | -263 | 30 | 26 | 18 | 0 | 0 | -190 | -4.9% | 7.0% |
| \$230k - 350k | 591 | 55 | 40 | 30 | 0 | 0 | 715 | 18.5% | 25.5% |
| \$350k - 460k | 974 | 51 | 34 | 27 | 0 | 0 | 1,087 | 28.2% | 53.7% |
| \$460k - 690k | 1,199 | 56 | 37 | 29 | 0 | 0 | 1,321 | 34.2% | 87.9% |
| \$690k + | 425 | 20 | 13 | 10 | 0 | 0 | 468 | 12.1% | 100.0% |
| Totals: | 3,266 | 264 | 188 | 141 | 0 | 0 | 3,859 | % All Units: | 81.5% |
| Percentage: | 84.6% | 6.8% | 4.9% | 3.7% | 0.0% | 0.0% | 100.0% | | |

| RENTAL HOUSING | | | | | | | | | |
|--------------------|---------------|-------------|--------------|--------------|-------------|-----------------|---------------|---------------------|---------------|
| Price Range | Single Family | Duplex | 3- or 4-plex | 5+ Units MFR | Mobile home | Boat, RV, other | Total Units | % of Units | Cummulative % |
| \$0 - 250 | 248 | 57 | 88 | 263 | 0 | 0 | 656 | 74.7% | 74.7% |
| \$250 - 375 | 110 | 21 | 31 | 90 | 0 | 0 | 252 | 28.7% | 103.4% |
| \$375 - 500 | 93 | 16 | 23 | 65 | 0 | 0 | 198 | 22.5% | 125.9% |
| \$500 - 625 | -101 | -54 | -97 | -320 | 0 | 0 | -572 | -65.1% | 60.8% |
| \$625 - 875 | -74 | -55 | -103 | -342 | 0 | 0 | -573 | -65.3% | -4.5% |
| \$875 - 1,250 | 106 | 4 | -3 | -28 | 0 | 0 | 78 | 8.9% | 4.4% |
| \$1,250 - 1,875 | 245 | 46 | 68 | 195 | 0 | 0 | 554 | 63.0% | 67.5% |
| \$1,875 - 2,500 | 72 | 14 | 21 | 60 | 0 | 0 | 166 | 18.9% | 86.4% |
| \$2,500 - 3,750 | 44 | 10 | 16 | 49 | 0 | 0 | 119 | 13.6% | 100.0% |
| \$3,750 + | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0.0% | 100.0% |
| Totals: | 743 | 60 | 43 | 32 | 0 | 0 | 878 | % All Units: | 18.5% |
| Percentage: | 84.6% | 6.8% | 4.9% | 3.7% | 0.0% | 0.0% | 100.0% | | |

| TOTAL HOUSING UNITS | | | | | | | | |
|---------------------|---------------|-------------|--------------|--------------|-------------|-----------------|---------------|-------------|
| | Single Family | Duplex | 3- or 4-plex | 5+ Units MFR | Mobile home | Boat, RV, other | Total Units | % of Units |
| Totals: | 4,010 | 324 | 231 | 173 | 0 | 0 | 4,737 | 100% |
| Percentage: | 84.6% | 6.8% | 4.9% | 3.7% | 0.0% | 0.0% | 100.0% | |

Sources: PSU Population Research Center, Claritas Inc., Census, Johnson Reid
 Values are in 2008 dollars.

PROJECTED NEW RESIDENTIAL LAND NEED, FOREST GROVE (2028)

| BASELINE GROWTH SCENARIO (2% Annual Pop. Growth) | | | | | | |
|---|--|---------------------------|---------------------------|-----------------------------|---------------------|--|
| ZONING DESIGNATION | Total Future Unit Need - Vacant Lands¹ | Units Per Net Acre | Net Acreage Needed | Gross Acreage Needed | Distribution | |
| SR Low Density Residential | 0 | 1.0 | 0 | 0 | NA | |
| R-10 Low Density Residential | -159 | 4.4 | 0 | 0 | NA | |
| R-7 Low Density Residential | -447 | 6.2 | 0 | 0 | NA | |
| R-5 Low Density Residential | -96 | 8.7 | 0 | 0 | NA | |
| RML Medium Density Residential | -55 | 12.0 | 0 | 0 | NA | |
| RMH High Density Residential | -43 | 20.3 | 0 | 0 | NA | |
| TC Town Center designations (3) | NA* | | | | | |
| Totals/Averages: | -800 | 8.9 | 0 | 0 | NA | |

| MEDIUM GROWTH SCENARIO (2.3% Annual Pop. Growth) | | | | | | |
|---|--|---------------------------|---------------------------|-----------------------------|---------------------|--|
| ZONING DESIGNATION | Total Future Unit Need - Vacant Lands¹ | Units Per Net Acre | Net Acreage Needed | Gross Acreage Needed | Distribution | |
| SR Low Density Residential | 0 | 1.0 | 0 | 0 | 0.0% | |
| R-10 Low Density Residential | 7 | 4.4 | 2 | 2 | 28.9% | |
| R-7 Low Density Residential | 21 | 6.2 | 3 | 4 | 57.1% | |
| R-5 Low Density Residential | 4 | 8.7 | 1 | 1 | 8.7% | |
| RML Medium Density Residential | 3 | 12.0 | 0 | 0 | 3.6% | |
| RMH High Density Residential | 2 | 20.3 | 0 | 0 | 1.7% | |
| TC Town Center designations (3) | NA* | | | | | |
| Totals/Averages: | 37 | 8.9 | 6 | 7 | 100% | |

| HIGH GROWTH SCENARIO (2.6% Annual Pop. Growth) | | | | | | |
|---|--|---------------------------|---------------------------|-----------------------------|---------------------|--|
| ZONING DESIGNATION | Total Future Unit Need - Vacant Lands¹ | Units Per Net Acre | Net Acreage Needed | Gross Acreage Needed | Distribution | |
| SR Low Density Residential | 0 | 1.0 | 0 | 0 | 0.0% | |
| R-10 Low Density Residential | 119 | 4.4 | 27 | 34 | 28.9% | |
| R-7 Low Density Residential | 334 | 6.2 | 54 | 67 | 57.1% | |
| R-5 Low Density Residential | 72 | 8.7 | 8 | 10 | 8.7% | |
| RML Medium Density Residential | 41 | 12.0 | 3 | 4 | 3.6% | |
| RMH High Density Residential | 32 | 20.3 | 2 | 2 | 1.7% | |
| TC Town Center designations (3) | NA* | | | | | |
| Totals/Averages: | 598 | 0.0 | 94 | 118 | 100% | |

¹ Assumes that Town Center designation, which is currently surrounded by incorporated land, will not expand, therefore its capacity is included in the capacity of current vacant lands.

Land Inventory and Response to Deficiency

Under state law when evaluating or amending a UGB, a local government must inventory land inside the UGB to determine where there is adequate development capacity to accommodate 20-year needs determine in OAR 660-024-0040. For residential land, the buildable land inventory must include vacant and redevelopable land and be conducted in accordance with OAR 660-007-0045 or OAR 660-008-0010, whichever is applicable, and ORS 197.296 for local governments subject to that statute. For employment land, the inventory must include suitable vacant and developed land designated for industrial or other employment use and must be conducted in accordance with OAR 660-009-0015(3).

Under state law Metro is responsible for evaluating and amending a UGB. The City of Forest Grove inventoried the land inside the UGB within the City's planning area in 2011 to determine where there is adequate development capacity to accommodate 20-year land needs. A buildable land inventory was also completed to assess the amount of constrained lands with little or no development capacity. Based on this analysis there is no deficiency in 20-year supply of land based on land use inventory, buildable land inventory and 2009 Economic Opportunity Analysis.

Each city must plan for and accommodate needed housing types⁴, such as multifamily and manufactured housing. Goal 10 requires each city to inventory its buildable residential lands⁵, project future needs for such lands, and plan and rezone enough buildable land to meet those needs. It also prohibits local plans from discriminating against needed housing types. The Comprehensive Plan complies with the preceding requirements in the following ways:

- The City prepared a Buildable Land Inventory and vacant land capacity analysis. The Planning Commission adopts the buildable land inventory and capacity analysis Residential Land Study.
- Needed housing types are identified in the Economic Opportunity Analysis. The Planning Commission adopts the data, findings, conclusions and recommendations contained in the EOA.
- The Comprehensive Plan does not contain policies that discriminate against needed housing types including manufactured homes. Furthermore the Comprehensive Plan does not restrict housing tenure.

Analysis of Government Assisted Housing Units

According to Metro and the Regional Equity Atlas there are approximately 607 publicly-subsidized affordable housing units in Forest Grove. This represents approximately 8.7% of the total dwelling units in Forest Grove.

| Project Name | Project Location | Number of Units |
|----------------------|------------------------------|------------------------|
| Harkson Court | 2900 22 nd Avenue | 20 |
| Covey Run Apartments | 1775 Covey Run Drive | 45 |

⁴ Needed housing types are defined in ORS 197.303 and includes attached and detached single family dwellings, multiple family dwellings at particular price ranges and rent levels available to renters and owners, government assisted housing, and manufactured homes on individual lots and within manufactured home subdivisions. The Forest Grove Economic Opportunity Analysis (2009) identifies needed housing types during the planning period and is adopted by reference.

⁵ The City conducted a Buildable Land Inventory in 2008 and updated in 2011 as part of review of the Metro Buildable Land Inventory and completion of a comprehensive local land use inventory. The Planning Commission adopts the buildable land inventories and land use inventory.

| | | |
|-----------------------------|------------------------------|----|
| Jose Arciga Apartments | 3231 22 nd Place | 55 |
| The Villager Apartments | 1921 Fir Road | 36 |
| Vanrich Apartments | 2016 B Street | 17 |
| Parkside Apartments | 2715 Main Street | 24 |
| 517 Ballard Way | 517 Ballard Way | 1 |
| 2731 Buxton Street | 2731 Buxton Street | 1 |
| 2738 Buxton Street | 2738 Buxton Street | 1 |
| 2736 Ballard Lane | 2736 Ballard Lane | 1 |
| 618 Ballard Lane | 618 Ballard Lane | 1 |
| 705 Willamina Avenue | 705 Willamina Avenue | 1 |
| 1770 Tamarack Way | 1770 Tamarack Way | 1 |
| 1816 Sequoia Court | 1816 Sequoia Court | 1 |
| 1721 Fir Road | 1721 Fir Road | 1 |
| 1755 Tamarack Way | 1755 Tamarack Way | 1 |
| 1626 Fir Court | 1626 Fir Court | 1 |
| 1704 Fir Court | 1704 Fir Court | 1 |
| 1525 Tara Court | 1525 Tara Court | 1 |
| 3506 18 th Place | 3506 18 th Place | 1 |
| 2221 23 rd Place | 2221 23 rd Place | 2 |
| 2225 23 rd Place | 2225 23 rd Place | 2 |
| 1804 Sequoia Court | 1804 Sequoia Court | 2 |
| Forest Grove Beehive | 2122 Hawthorne Street | 44 |
| Willow Park Apartments | 2824 22 nd Avenue | 46 |
| Wynwood of Forest Grove | 3110 19 th Avenue | 82 |
| Garden Grove Apartments | 2727 22 nd Avenue | 48 |
| Forest Manor Apartments I | 2141 Quince Street | 19 |
| Forest Manor Apartments II | 2141 Quince Street | 6 |
| Forest Villa Apartments | 2131 Quince Street | 84 |
| Elm Park I and II | 2350 Elm Street | 62 |

Source: Regional Equity Atlas

The current inventory of mobile home units is approximately 698 mobile home units. Manufactured dwelling parks in Forest Grove include; Quail Run, The Homestead, Rose Grove Mobile Home Park and Hampton Court (2829 Pacific Avenue).

The Housing Chapter of the Comprehensive Plan is consistent with Title 1 of the Metro Urban Growth Management Functional Plan. The Housing Chapter promotes housing choice based on identified needs contained in the Economic Opportunity Analysis.

Finding: The Forest Grove Comprehensive Plan substantially complies with Goal 10 housing and the applicable Oregon Administrative Rules and the Metro Urban Growth Management Functional Plan.

Goal 11: Public Facilities and Services The primary purpose of Goal 11 is to plan and develop a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban and rural development.

Analysis: The Public Facilities and Community Services chapter of the Comprehensive Plan addresses the requirements of Goal 11. The Public Facilities and Community Services Chapter of the Comprehensive Plan along with the Land Use Chapter promotes an orderly and efficient arrangement of public facilities within the urban growth boundary based on available resources. The Public Facilities and Community Services Chapter of the Comprehensive Plan addresses the municipal water, sanitary sewer and storm sewer systems. The Transportation Chapter of the Comprehensive Plan addresses transportation system needs and constraints. The Public

Facilities and Community Services Chapter of the Comprehensive Plan incorporates by reference the adopted Water (August 2010), Clean Water Services Sewer Master Plan Update (2009) Storm Sewer Drainage Master Plan (November 2007), Sanitary Sewer (November 2007), and Park, Recreation and Open Spaces Master Plan (December 2001), and City of Forest Grove Light and Power Substation Master Plan (July 2013). In addition to the public services identified above, the Public Facilities and Community Services chapter addresses public safety, health services, energy, parks and cultural resources, solid waste and recycling, communication services, library and city administrative services.

OAR 660-011-0010(1) states that the public facility plan shall contain the following items:

- (a) An inventory and general assessment of the condition of all significant public facility systems which support the land uses designated in the acknowledged comprehensive plan;
- (b) A list of the significant public facility projects which are to support the land use designated in the acknowledged comprehensive plan. Public facility project descriptions or specifications of these projects as necessary;
- (c) Rough cost estimates of each public facility project;
- (d) a map or written description of each public facility project's general location or service area.
- (e) Policy statement(s) or urban growth management agreement identifying the provider of each public facility system.
- (f) an estimate of when each facility project will be needed; and
- (g) A discussion of the provider's existing funding mechanism and the ability of these and possible new mechanisms to fund the development of each public facility project or system.

The Public Facilities and Community Services Chapter of the Forest Grove Comprehensive Plan provides a general overview of the various municipal infrastructures systems including needs and deficiencies. The Public Facilities and Community Services Chapter also identifies infrastructure projects and associated costs. Additional information necessary for compliance with OAR 660-01100010(1) including an inventory of public facility systems and condition, significant projects necessary to support planned land uses, cost estimates, maps showing project locations, expected timing for construction and funding mechanisms can be found in the public facility master plans list above.

OAR 660-011-0010(2) states those public facilities to be addressed in the plan shall include, but need not be limited to those specified in OAR 660-011-0005(5). Facilities included in the public facility plan other than those included in OAR 660-011-0005(5) will not be reviewed for compliance with this rule. The facilities listed under OAR 660-011-005(5) include water, sewer, and transportation facilities. The Public Facilities and Community Services Chapter of the Comprehensive Plan address water and sewer systems. The Transportation Chapter of the Comprehensive Plan and Transportation System Plan Update complemented concurrently with Periodic Review addresses the transportation system.

OAR 660-011-0010(3) states it is not the purpose of this division to cause duplication of or to supplant existing applicable facility plans and programs. Where all or part of an acknowledged comprehensive plan, facility master plan either of the local jurisdiction or appropriate special district, capital improvement program, regional functional plan, similar plan or any combination of such plans meets all or some of the requirements of this division, those plans, or programs may be incorporated by reference into the public facility plan required by this division. Only those referenced portions of such documents shall be considered to be a part of the public facility plan and shall be subject to the administrative procedures of this division and ORS Chapter 197. The Public Facilities and Community Services Chapter of the Comprehensive

Plan incorporates by reference the master plans identified above including the findings, conclusions and recommendations.

OAR 660-011-0015(1) states the responsibility for the preparation, adoption and amendment of the public facility plan shall be specified within the urban growth management agreement. The Urban Planning Area Agreement (UPAA) between Washington County and Forest Grove, executed on October 25, 1988, outlines the roles and responsibilities for the provision of public services within the Forest Grove planning area (unincorporated area within the urban growth boundary). The UPAA specifies the City of Forest Grove is the appropriate governmental agency responsible for providing public services at such time property is annexed into the city. Provision of urban services is contingent upon annexation into the City of Forest Grove. The 1988 UPAA remains in effect.

OAR 660-011-0015(2) states the jurisdiction responsible for the preparation of the public facility plan shall provide for the coordination of such preparation with the city, county, special districts and, as necessary, state and federal agencies and private providers of public facilities.

Response:

OAR 660-011-0020(1) The public facility plan shall include an inventory of significant public facility systems. Where the acknowledged comprehensive plan, background document or one or more plans or programs listed in OAR 660-011-0010(3) contains such an inventory, that inventory may be incorporated by reference. The City's public facility master plans for water, sanitary sewer, storm drainage, and transportation are incorporated into the Comprehensive Plan by reference.

OAR 660-011-0025 states: (1) the public facilities plan shall include a general estimate of the timing for the planned public facility projects. The timing of projects may be related directly to population growth; service level; long term availability of funding and (2) projects should be identified as occurring either in the short term or long term. The Public Facilities and Community Services chapter of the Comprehensive Plan provides a summary of the required planned public facility projects needed to meet long term (20-year) development needs. Additional detail is provided in the water, sanitary sewer, storm drainage and Transportation System Plans incorporated herein by reference.

OAR 660-011-0030 states: the public facility plan shall identify the general location of the public facility project in specificity appropriate for the facility. OAR 660-011-0035 states the public facility plan shall include rough cost estimates for those sewer, water, and transportation public facility projects identified in the facility plan. The Public Facilities and Community Services chapter of the Comprehensive Plan provides a summary of the required planned public facility projects needed to meet long term (20-year) development needs. Additional detail is provided in the water, sanitary sewer, storm drainage and Transportation System Plans incorporated herein by reference.

OAR 660-011-0045 states (1) the governing body of the city or county responsible for development of the public facility plan shall adopt the plan as a supporting document to the jurisdiction's comprehensive plan and shall also adopt as part of the comprehensive plan (a) The list of public facility project titles, excluding (if the jurisdiction so chooses) the descriptions or specifications of those projects; (b) a map or written description of the public facility projects' locations or service area as specified in sections (2) and (3). (c) The policy(ies) or urban growth management agreement designating the provider of each public facility system. The Public Facilities and Community Services chapter to the Comprehensive Plan includes these provisions.

The Public Facilities and Community Services Chapter of the Comprehensive Plan is consistent with Metro Regional Framework Plan Chapter 3 (Nature in Neighborhoods). Chapter 3 promotes the provision of parks and open space. The Public Facilities and Community Services Chapter of the Comprehensive Plan provides an inventory of park facilities consistent Metro Regional Framework Policy 3.1 and Policy 3.5.

Finding: For the reasons stated above the Comprehensive Plan complies with Goal 11 and the Metro Regional Framework Plan.

Goal 12: Transportation The primary purpose of Goal 12 is to promote a balanced multimodal transportation system taking into account future development and land use.

Analysis: The Transportation Chapter of Comprehensive Plan summarizes the findings, goals and policies contained in the Transportation System Plan. Both the transportation chapter and the Transportation System Plan supports a balanced multi-modal transportation system.

The Planning Commission adopts Appendix K to the Transportation System Plan update including the findings and conclusion therein.

Finding: The Transportation Chapter of the Forest Grove Comprehensive Plan is consistent with Goal 12.

Goal 14: Urbanization The primary purpose of Goal 14 is to provide for an orderly and efficient transition from rural to urban land use, to accommodate urban population and urban employment inside urban growth boundaries, to ensure efficient use of land and to provide for livable communities.

Analysis: The Urbanization Chapter of the Comprehensive Plan establishes an urbanization and growth management program for the City. This program provides for an orderly and efficient transition from urban to rural land use; accommodates employment and population needs within the urban growth boundary. The local urbanization program is based on the Urban Area Planning Agreement (UPAA) executed between Washington County and Forest Grove in 1988. Among other things the UPAA identifies roles and responsibilities for the provision of urban services within the urban growth boundary. The Urbanization Chapter of the Comprehensive Plan describes the local annexation program.

With respect to the UGB, the boundary must be based on the adopted 20-year population forecast for the urban area described in OAR 660-024-0030, and must provide for needed housing, employment and other urban uses such as public facilities, streets and roads, schools, parks, and open space over the 20-year planning period consistent with the land need requirements of Goal 14 and this rule. The 20-year need determinations are estimates which, although based on the best available information and methodologies, should not be held to an unreasonably high level of precision. Under state law, Metro is responsible for managing the location of the urban growth boundary. In addition, Metro is responsible for ensuring the urban growth boundary provides for a 20-year supply of land for housing, employment and other urban uses. This is accomplished through the Urban Growth Report which is prepared every five years.

The Urbanization Chapter of the Comprehensive Plan establishes a growth management program consistent with the Metro Regional Framework Plan. The local urbanization program promotes an efficient arrangement of land uses and the orderly and efficient provision of public services. This is further reinforced in the Land Use Chapter of the Comprehensive Plan and the Public Facilities and Community Services Chapter of the plan.

Finding: The Urbanization Chapter of the Comprehensive Plan is consistent with Goal 14 and the Metro Regional Framework Plan.

Comprehensive Plan Map Amendments Findings

Property at End of Elm Street

Metro Urban Growth Management Functional Plan Title 4 Criteria

3.07.450 (Employment and Industrial Areas Map) Section C: A city or county may amend its comprehensive plan or zoning regulations to change its designation of land on the Employment and Industrial Areas Map in order to allow uses not allowed by Title 4 upon a demonstration that:

1. The property is not surrounded by land designated on the map as Industrial Area, Regionally Significant Industrial Area or a combination of the two.
2. The amendment will not reduce employment capacity of the city or county.
3. If the map designates the property as Regionally Significant Industrial Area, the subject property does not have access to specialized services, such as redundant electrical power or industrial gases, and is not proximate to freight loading and unloading facilities, such as transshipment facilities.
4. The amendment would not allow uses that would reduce off-peak performance on Main Roadway Routes and Roadway Connectors shown on the Regional Freight Network Map in the RTP below volume-to-capacity standards in the plan, unless mitigating action is taken that will restore performance to RTP standards within two years after approval of uses.
5. The amendment would not diminish the intended function of the Central City or Regional or Town Centers as the principal locations of retail, cultural, and civic services in their market areas; and
6. If the map designates the property as Regionally Significant Industrial Area, the property subject to amendment is ten acres or less; if designated Industrial Area, the property subject to the amendment is 20 acres or less, if designated Employment Area, the property subject to the amendment is 40 acres or less.

3.07.450(D). A city or county may also amend its comprehensive plan or zoning regulations to change its designation of land on the Employment and Industrial Areas Map in order to allow uses not allowed by this title upon a demonstration that:

1. The entire property is not buildable due to environmental constraints; or Finding: Property is buildable.
2. The property borders land that is not designated on the map as Industrial Area or Regionally Significant Industrial Area; and Finding: Davidson site does not border land that is designated as Industrial Area or Regionally Significant Industrial Area.
3. The assessed value of a building or buildings on the property, built prior to March 5, 2004, and historically occupied by uses not allowed by this title, exceeds the assessed value of the land by a ratio of 1.5 to 1. Finding: Buildings on the properties do not exceed the land value.

Sunset Drive Property

- Promote Housing, needed services and jobs

- Efficient use of land
- Local Commercial Land Use Goal 4: Encourage development of neighborhood convenience centers as needed in outlying areas of the City to serve existing and future residential development.

Finding: The subject property is generally located east of Sunset Drive and southwest of Highway 47. The property is designated General Industrial. A historic structure is present near the far southern portion of property. The site also contains two trees listed on the City's Register of Significant Trees. The north-eastern edge of the property is adjacent to the urban growth boundary. The south and eastern sides of the property are adjacent to property designated Single Family Residential R-7. The subject property is disconnected from the City's established industrial areas. The nearest established industrial area, at Quince Street and 24th Avenue, is located approximately 1.4 miles to the east via Sunset Drive and Highway 47. The subject property is adjacent to Oregon Highway 47, a principal arterial on the Transportation System Plan map and Sunset Drive, a designated collector street. The property is not adjacent nor served by rail transportation. The subject site is approximately 25 acres in land area. The site has been designated as light industrial planned development since 1980. The site remains vacant today. Since 1980 significant residential construction has occurred to the south and west of the property. The location of the property and size supports the development a mixed-use node with residential, office, and service uses. With sufficient density this node could become an anchor for transit service. Promoting retail and office uses in this area will complement existing residential areas and promote "complete" neighborhoods. This concept supports Local Commercial Land Use Goal4: Encourage development of neighborhood convenience centers as needed in outlying areas of the City to serve existing and future residential development.

Conclusion: Re-designation of the subject property is consistent with applicable Comprehensive Plan policies. Applicable policies include:

Local Urbanization Goal 1: Land shall be made available within the urban growth boundary to meet all urban land use needs.

Elm Street Property

Finding: The historic AT Smith House is located near the terminus of Elm Street at the periphery of the General Industrial area south of Highway 47. The AT Smith House is need of repair and is currently vacant. This structure is one of the first dwellings in the Forest Grove area and is a significant cultural resource. The current General Industrial designation is inconsistent with preservation of this resource. Re-designating the property as Institutional reflects the presence of a designated historic structure on the subject property owned by a non-profit organization (Friends of Historic Forest Grove). Applying the Institutional designation to the site and associated adjacent land will provide a higher level of protection for this historic resource since uses and activities are limited. All allowed uses within the Institutional designation, except basic utilities, some community recreation uses, and government offices require conditional use approval under the Forest Grove Development Code. The re-designation of the site will not negatively impact employment capacity within Forest Grove since a portion of the site is developed with an historic structure and the adjacent property also owned by the Friends of Historic Forest Grove will not be developed for industrial purposes. Re-designation of the site is consistent with Goal 1 and Goal 2 of the Historic Preservation and Scenic Areas section of the Comprehensive which states:

Goal 1: Preserve and enhance areas, sites and structures, of historic and cultural significance to the Forest Grove area

Goal 2: Promote the community's cultural institutions and traditions.

The Institutional designation also promotes preservation of the AT Smith house by providing the potential for adaptive reuse to general offices or a cultural institution. Cultural institutions are defined in the Forest Grove Development Code as museum-like preservation and exhibition of objects in such activities as the arts and sciences, gallery exhibition of works of art, or library collection of books, manuscripts, etc. for study and reading. Cultural institutions are not permitted in the General Industrial zone and office activities are limited.

Conclusion: Re-designation of the subject property is consistent with applicable Comprehensive Plan policies and promotes the preservation of an identified historic and cultural resource.

Post Office Property

Finding: The Forest Grove Post Office located within the Town Center is housed in a building that is privately owned. The land area of the subject property is approximately 0.34 acres. The current zoning designation is Institutional. Adjacent property is designated Town Center Support. As the City grows pressure will build for a larger post office facility serving a growing population with sufficient land area for needed parking and circulation. Re-designation of the subject property to Town Center Support consistent with adjacent property will expand options for the re-use of the building and site. This action supports a strong Town Center consistent with Comprehensive Plan policies. This action also promotes economic development potential by expanding opportunities for new businesses within the Forest Grove Town Center.

Conclusion: Re-designation of the subject property is consistent with the Forest Grove Comprehensive Plan for the reasons stated above.

South of Pacific Avenue Area (west of Town Center)

Finding: Area has been designated Multi-family high density since 1980. Reduction of density with greater distance from the Town Center better meets the Comprehensive Plan land use criteria for designation of land. Designation allows for development and preserves the residential character of the area along Ritchey Road. Conclusion: Re-designation of the area south of Pacific Avenue west of the Town Center is consistent with the applicable policies contained in the comprehensive plan. Applicable policies include:

Sunset Drive Title 4 Findings

3.07.450 (C) A city or county may amend its comprehensive plan or zoning regulations to change its designation of land on the Employment and Industrial Areas Map in order to allow uses not allowed by this title upon demonstration that:

1. The property is not surrounded by land designated on the map as Industrial Area, Regionally Significant Industrial Area or a combination of the two;
2. The amendment will not reduce the employment capacity of the city or county;
3. If the map designates the property as Regionally Significant Industrial Area, the subject property does not have access to specialized services, such as redundant electrical power or industrial gases, and is not proximate to freight loading and unloading facilities, such as trans-shipment facilities;
4. The amendment would not allow uses that would reduce off-peak performance on Main Roadway Routes and Roadway Connectors shown on the Regional Freight Network Map in the RTP below volume-to-capacity standards in the plan, unless

- mitigating action is taken that will restore performance to RTP standards within two years after approval of uses;
5. The amendment would not diminish the intended function of the Central City or Regional or Town Centers as the principal locations of retail, cultural and civic services in their market areas;
 6. If the map designates the property as Regionally Significant Industrial Area, the property subject to the amendment is ten acres or less; if designated Industrial Area, the property subject to the amendment is 20 acres or less; if designated Employment Area, the property subject to the amendment is 40 acres or less.

Finding 1: The subject property is disconnected from the City's developed industrial areas. The nearest industrial area is located along 23rd Avenue east of Sunset Drive approximately 2/3 mile distant. The site is adjacent to the urban growth boundary on one side and residential land on the other three sides. The site is not surrounded by land on the Title 4 map

Finding 2: The designation will increase the employment capacity of the city since office commercial yields an average jobs per net acre that is much higher than industrial uses (37.9 jobs per acre for commercial versus 16.9 jobs per acre for industrial uses).

Finding 3: Site is not designated as Regionally Significant Industrial Area. Therefore, this criterion is not applicable.

Finding 4: Highway 47 is designated as a Roadway Connector in the Regional Freight Plan. However, the site has no direct access onto Highway 47. Access is available from Sunset Drive. Sunset Drive is designated as a collector street in the Forest Grove Transportation System Plan. The intersection at Sunset Drive and Highway 47 is signalized. Although, the amendment will allow for a variety of activities including employment and residential uses it is unclear how development will impact off peak performance. Current v/c is 0.37. Projected 2035 v/c is 0.61. Necessary mitigation measures would be considered at time of development application based on type of use. Given existing and project LOS and the process for additional review at time of development this criterion is met.

Finding 5: The net developable acreage of the site is approximately 18.5 net acres. The intent of the designation is to promote complete neighborhoods with residential, commercial and employment in proximity. In addition, this designation promotes nodal development that could complement the Town Center. The Town Center would still function as the principal location for specialized retail (such as restaurants), cultural and civic activities within the Forest Grove market area.

Finding 6: This criterion is not clear to gross acres or net acres. Most zoning standards refer to net acreage. Metro buildable land inventory capacity assessment uses net acreage for analysis. Therefore, the City assumes net acreage is the standard. The site is 2.5 gross acres. The gross developable area of the site excluding the existing farm house and surrounding area is approximately 21.7 gross acres. The subject property has a net acreage that is less than twenty. Deducting land for streets and right-of-way equal to 15% of the gross area yields a net developable acreage of 18.5 acres. Therefore, this criterion is met.

Based on the above findings, the Planning Commission hereby recommends approval

TOM BECK, Chair

Date