



**Comprehensive Plan Map and
Zoning Map Amendments
Staff Report and Recommendation**
Community Development Department, Planning Division

Report Date	March 22, 2019
Hearing Date	April 1, 2019
Land Use Request	Comprehensive Plan Map and Zoning Map Amendments to re-designate and rezone three parcels from General Industrial to High Density Residential
File Number	311-19-000001-PLNG
Property Location	2352 and 2355 Kingwood Street, and one unaddressed parcel
Legal Description	Washington County tax lots 1N331DA07400, 1N331DA07500 and 1N332C000800
Owners/Applicants	Roberta Reynolds, PO Box 431, Banks, Oregon 97106 Linda Eshraghi, PO Box 44, Forest Grove, Oregon 97116
Comprehensive Plan Designation	GI General Industrial
Zoning Map Designation	GI General Industrial
Historic District	Not applicable
Applicable Decision Considerations, Standards and Criteria	<u>Comprehensive Plan Amendment</u> <ul style="list-style-type: none">▪ Oregon Statewide Land Use Planning Goals▪ Forest Grove Comprehensive Plan Policies▪ Metro Regional Framework Plan▪ Metro Urban Growth Management Functional Plan <u>Zoning Map Amendment</u> <ul style="list-style-type: none">▪ Development Code §10.2.770 <i>Map Amendment Criteria</i>
Reviewing Staff	James Reitz (AICP), Senior Planner
Recommendation	The proposed Comprehensive Plan Map and Zoning Map amendments meet the requirements of the applicable decision considerations, standards and criteria. Staff recommends that the Planning Commission forward the application to the City Council with a positive recommendation.

I. LAND USE HISTORY

The subject properties have been designated General Industrial since at least 1987. The adjoining properties to the west and north (west of an unnamed Council Creek tributary) were re-designated from General Industrial to Residential Multi-Family High Density in 1990. Much of that area has since been developed with residential subdivisions, including Casey West, Casey Meadows and Hawthorne Meadows.

The three parcels making up this application historically took their access from Kingwood Street via a private railroad crossing to the south. With the completion of the Casey Meadows neighborhood, two of the parcels now have frontage onto 25th Avenue; the remaining parcel has access to 25th Avenue via an easement.

II. DESCRIPTION OF PROPOSAL

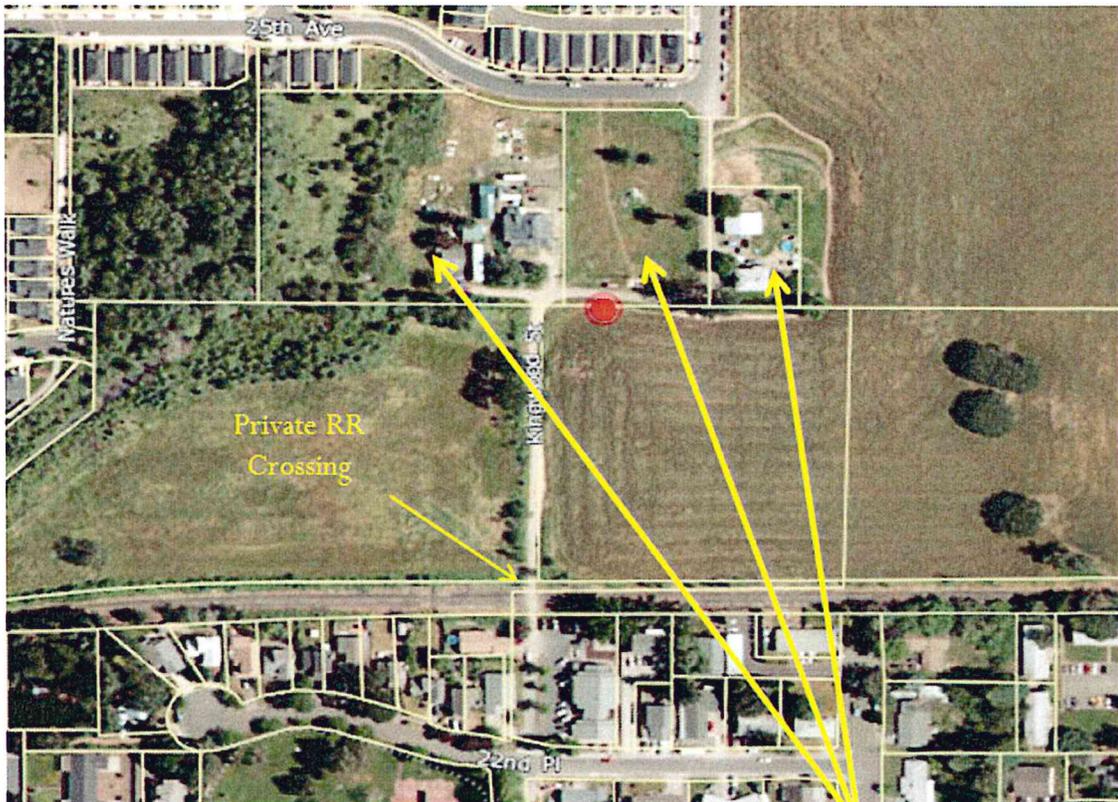
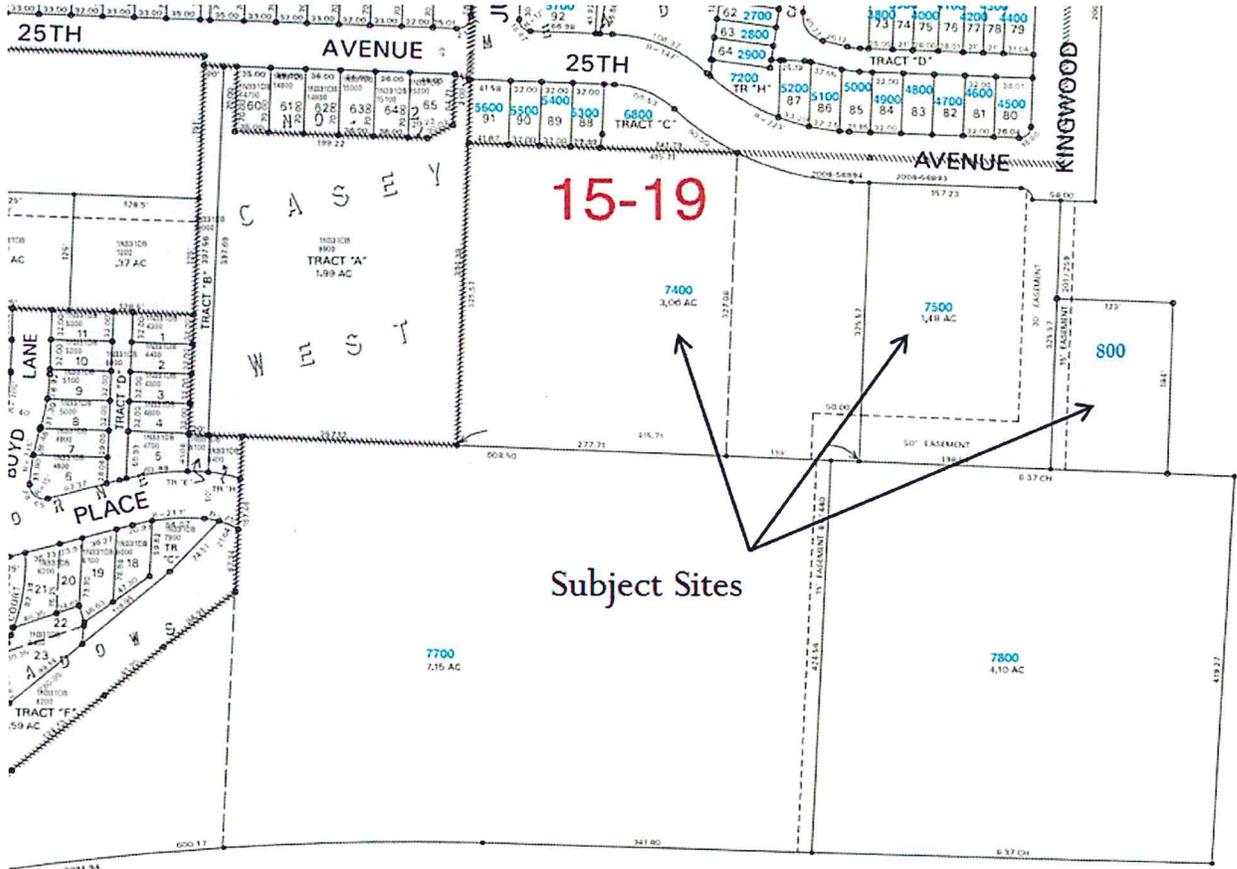
The proposal is an amendment to the Comprehensive Plan Map to re-designate three parcels from General Industrial (GI) to High Density Residential (HDR), and an amendment to the Zoning Map to re-designate those same parcels from General Industrial (GI) to Residential Multi-Family High Density (RMH).

III. SITE EXAMINATION

The subject area totals 4.86 acres. Washington County tax lot 1N331DA07400 is developed with a single-family home and outbuildings; it is also bisected by a tributary to Council Creek (see Wetland Map in Section V below). Tax lot 1N331DA07500 is vacant. Tax lot 1N332C000800 is developed with a single-family home. The area is flat and landscaped with field grass and a scattering of trees and shrubs. The 25th Avenue street frontage is partially improved, lacking only sidewalks and parkway landscaping.

Existing Comprehensive Plan Designation and Zoning of Site and Area

LOCATION	COMPREHENSIVE PLAN DESIGNATION	ZONING DISTRICT	LAND USE
Tax Lot 800	General Industrial (GI)	General Industrial (GI)	Single-Family Home
Tax Lot 7400	General Industrial (GI)	General Industrial (GI)	Single-Family Home
Tax Lot 7500	General Industrial (GI)	General Industrial (GI)	Vacant
North	High Density Residential (HDR)	Residential Multi-Family High Density (RMH)	Casey Meadows Subdivision
South	General Industrial (GI)	General Industrial (GI)	Vacant
East	General Industrial (GI)	General Industrial (GI)	Vacant
West	High Density Residential (HDR)	Residential Multi-Family High Density (RMH)	Casey West Subdivision - Open Space & Wetland Tract



Subject Parcels

IV. PROCEDURAL REQUIREMENTS

Comprehensive Plan Map Amendment Process: “Plan amendments may be initiated by the following parties: property owner of record or authorized agent of the property owner of record; contract purchaser, City Council, Planning Commission, City Manager, or Community Development Director.” (Forest Grove Comprehensive Plan - Volume 1 p. 27)

This application was initiated by the owners of the two eastern-most properties. Because tax lot 1N331DA07400 to the west would otherwise be bounded on three sides by a residential designation (if this application is approved for the other two parcels) staff has included it in this review process.

The Planning Commission will consider the merits of the proposal and prepare a recommendation to the City Council.

Zoning Map Amendment Process: Development Code §10.2.760 *Procedure* authorizes the Planning Commission to make a recommendation to the City Council after reviewing the application pursuant to a Type 3 procedure.

Comprehensive Plan Amendment and Zoning Map Amendment approval criteria follow in Section V below.

DLCD and Metro Notification and Review: Notice of the proposed comprehensive plan and zoning map amendments was provided to the Department of Land Conservation and Development (DLCD) and Metro on February 22, 2019 pursuant to ORS 197.610, OAR Chapter 660 – Division 18, and Metro Code §3.07.820 (Functional Plan Title 8). Neither agency has registered any comments.

Public Notice: Public notice for this application was mailed to property owners and residents within 300 feet of the site on March 11, 2019; and published in the *News Times* on March 27, 2019, as required by Development Code §10.1.610.

As of the writing of this report, no written comments have been received from the public.

V. REQUIRED APPROVALS AND FINDINGS

The following decision considerations apply to the proposed Comprehensive Plan Map amendment –

- Applicable Oregon Statewide Land Use Planning Goals;
- Applicable Comprehensive Plan policies;
- Metro Regional Framework Plan; and
- Metro Urban Growth Management Functional Plan.

The following criteria apply to the proposed Zoning Map amendment (DC §10.2.770) –

- A. The zone change is consistent with the Comprehensive Plan Map. When the Comprehensive Plan has more than one implementing zone as shown on the Correspondence Table in Article 3, it must be shown that the proposed zone is the most appropriate, taking into consideration the purposes of each zone and the zoning pattern of surrounding land.

- B. The zone change is consistent with relevant goals and policies of the Comprehensive Plan, as identified by the Director.
- C. The site is suitable for the proposed zone and there is a lack of appropriately designated alternative sites within the vicinity. The size of the vicinity will be determined on a case-by-case basis since the impacts of a proposed zone and its potential uses vary. The factors to be considered in determining suitability are parcel size and location.
- D. The zone change is consistent with the adopted Transportation System Plan. Development allowed by the zone change will not substantially impact the functional classification or operation of transportation facilities, or reduce the level of service of transportation facilities below the minimum acceptable level identified in the Transportation System Plan. To ensure proper review and mitigation, a traffic impact study may be required for the proposed zone change if it may impact transportation facilities.
- E. Public facilities and services for water supply, sanitary waste disposal, storm water disposal, and police and fire protection are capable of supporting the uses allowed by the zone. Adequacy of services is based on the projected service demands of the site and the ability of the public services to accommodate those demands.
- F. The establishment of a zone district is not subject to the meeting of conditions.

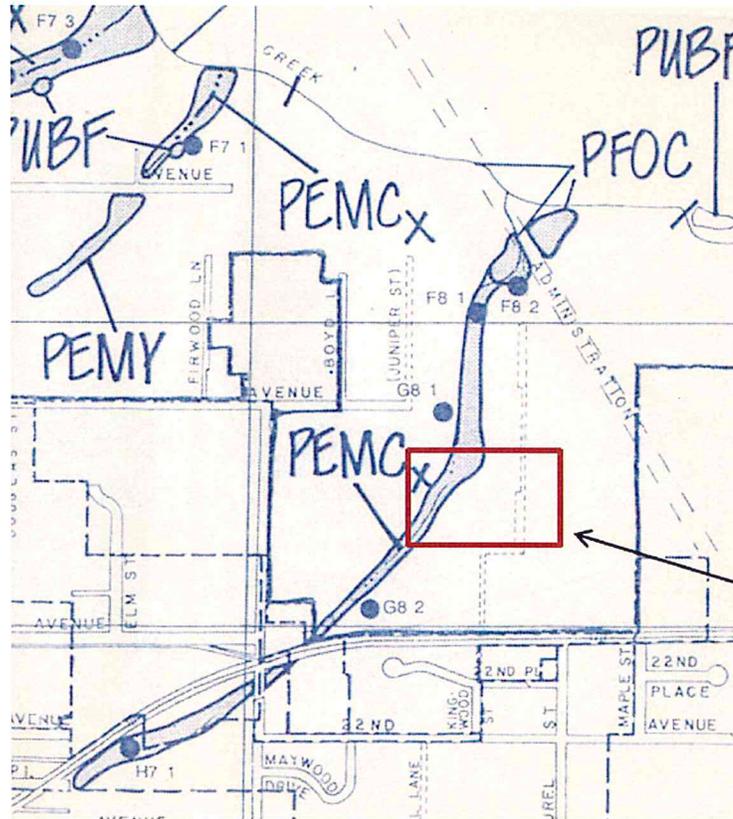
The applicable decision considerations and approval criteria are described more fully below. Findings are also provided below.

Oregon Statewide Land Use Planning Goals

Goal 2 – Land Use: Goal 2 establishes guidelines for major revisions and minor changes to the Comprehensive Plan. Goal 2 stipulates that a minor change should be based on information that will serve as the factual basis to support the change. The public need and justification for the change should be established.

Finding for Goal 2: The proposed Comprehensive Plan amendment affects three parcels with a combined area of 4.86 acres. Re-designating the properties from General Industrial to High Density Residential will not have a significant effect beyond the immediate area of the change and is therefore considered to be a minor amendment. This determination is based on the aggregate area of the parcels and their limited individual areas:

- Tax lot 1N331DA07400 is 3.06 acres. It's development potential is constrained because it is bisected by a creek, and CWS standards require a minimum 50-foot-wide buffer on either side (see Wetland Map, below);
- Tax lot 1N331DA07500 is 1.35 acres with no known constraints;
- Tax lot 1N332C000800 is 0.45 acres but has no frontage onto any public street.



Wetland Map

The public benefit of the proposed Comprehensive Plan Map and Zoning Map amendment is to promote development on the property, thereby increasing the City's tax base. The properties have not developed with industrial uses and they are unlikely to become industrial given their adjacency to a residential neighborhood, lack of access to a Collector or Arterial street (access for the near term would only be via Local streets through a residential area), small lot sizes, and, in the case of tax lot 1N331DA07400, the wetland and required buffer area. The conceptual 23rd/24th Avenue Collector extension between Hawthorne and Oak streets shown below may not actually serve these properties, as it may need to be sited farther south in order to avoid the wetland.



Goal 10 - Housing: Goal 10 specifies that each city and county must plan for and accommodate needed housing types and to plan and zone enough buildable land to meet those needs.

Finding for Goal 10: The City's Economic Opportunity Analysis shows a need for 3,900 housing units over the next 20 years, based on the Baseline Growth Scenario of 2% per year. Re-designating the subject area from General Industrial to High Density Residential will provide opportunity to meet the identified housing need. If zoned for high density residential development the three parcels could accommodate as few as about 80 units and as many as about 100 units, based on gross acreage. The actual number of units would be based on net acreage, i.e., the area remaining that is not environmentally-constrained and following any rights-of-way and/or open space dedications.

Designating the property as High Density Residential would also help the City achieve a minimum development residential density allocation for new construction of 8 units per acre that the City must meet overall under the Metropolitan Housing Rule (OAR 660-0007-0035).

Metro Regional Framework Plan

The Metro Regional Framework Plan establishes a land use concept for the Portland region. Under the Metro Charter and state law, cities and counties within Metro's boundaries are required to comply and be consistent with the Regional Framework Plan.

The plan contains policies for growth management and land use planning for matters of metropolitan concern. It establishes a hierarchy of mixed-use, pedestrian friendly centers that are well connected by high capacity transit and corridors. It establishes Regional Centers, Town Centers, Corridors, Transit Station Communities, neighborhoods, and Industrial and Employment areas.

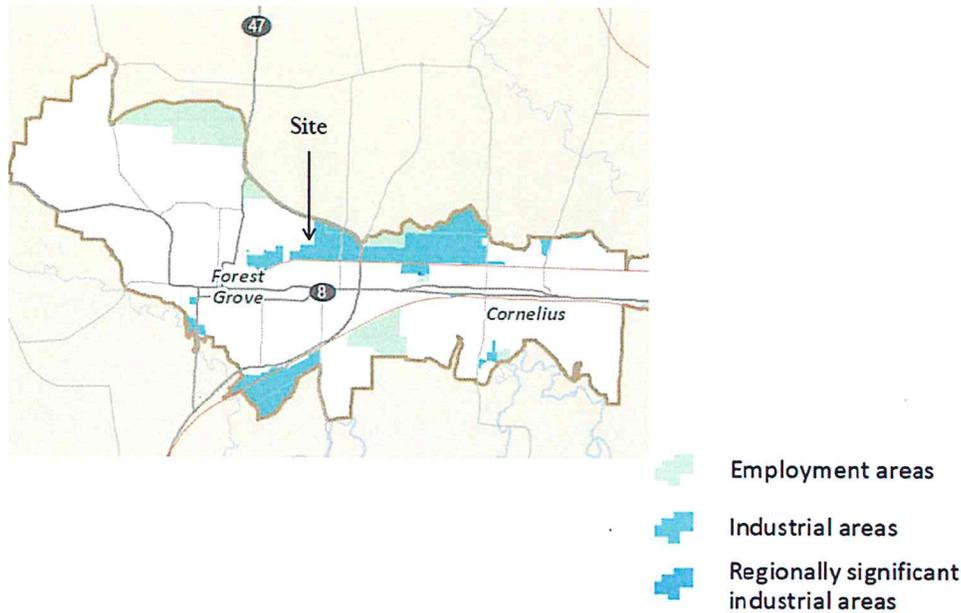
Finding: If approved, the proposed Comprehensive Plan Map and Zoning Map amendments will result in the re-designation of 4.86 acres of land from General Industrial to High Density Residential/Residential Multi-Family High density. The subject area is bounded on two sides (north and west) by lands designated as High Density Residential. The amendment supports the Metro Regional Framework Plan by promoting additional housing opportunities near the Town Center and Highway 8 (Pacific Avenue) corridor, and a nearby industrial area.

Metro Urban Growth Management Functional Plan

The Metro Urban Growth Management Functional Plan implements provisions of the Metro Regional Framework Plan including promoting a compact urban form. The following chapter of the Metro Urban Growth Management Functional Plan is applicable to this proposal, since the subject area is currently zoned for industrial uses:

Title 4: Industrial and Other Employment Areas - The subject properties are identified as within an Industrial Area on the Metro Employment and Industrial Area Map as shown below. Therefore, the provisions of Title 4 pertaining to map amendments apply.

For context, the blue areas on the map are designated Industrial areas and the green areas are Employment lands. The subject properties are connected to the Industrial Areas located to the east and south.



Under Urban Growth Management Functional Plan §3.07.450(C), a city or county may amend its comprehensive plan or zoning map designation to allow uses in an Employment or Industrial area upon making 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;

Finding: The subject properties are not surrounded by land by land designated on the map as Industrial Area, Regionally Significant Industrial Area, or a combination of the two. The subject properties are bounded on the north and west by land designated Residential Multi-Family High density on the Zoning Map. Therefore, the subject properties qualify for a potential re-designation from an industrial to a non-industrial zone such as Residential Multi-Family High density.

- (2) The amendment will not reduce the employment capacity of the city or county.

Finding: The subject properties have been designated General Industrial since at least 1987 yet have not converted to industrial use. The amendment would have little impact on the employment capacity of the city or county because the subject site is less than 5 acres in size and has been partially developed with two single-family homes that do not contribute to the employment of the area. Furthermore, the largest parcel is bisected by a creek and wetland thus further limiting the potential developable area. Given the minor impact to the city's or county's employment capacity, the subject properties qualify for a potential re-designation from an industrial to a non-industrial zone such as Residential Multi-Family High density.

- (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.

Finding: The subject properties are not designated as a Regionally Significant Industrial Area. Since they are not designated as a Regionally Significant Industrial Area, this criterion does not apply.

- (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 TRP standards within two years after approval of uses.

Finding: The subject properties are located on or near 25th Avenue and Kingwood Street. Neither street is designated as a Main Roadway Route or Roadway Connector on the Regional Freight Network Map in the RTP. Therefore, the amendment will not allow uses that would reduce off-peak performance on Main Roadway Routes or Roadway Connectors or impact volume-to-capacity standards in the RTP. Thus, the subject properties qualify for re-designation from General Industrial to Residential Multi-Family High density.

- (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.

Finding: The proposed amendment will allow for residential development. As such, it 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 the market area.

- (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 4 acres or less.

Finding: The site is not designated as a Regionally Significant Industrial Area or an Employment Area. It is designated as an Industrial Area. As the site totals 4.86 acres in area, it complies with the criterion that the area subject to the amendment is 20 acres or less.

Functional Plan §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: Two of the subject properties are buildable in their entirety. The property at 2352 Kingwood Street (tax lot 1N331DA07400) is bisected by an unnamed tributary of Council Creek, as documented in the 1993 Local Wetland Inventory. The creek and its associated wetland and buffer area are not buildable.

- (2) The property borders land that is not designated on the map as Industrial Area or Regionally Significant Industrial Area; and

Finding: The site borders land designated as an Industrial area on the Metro - Title 4, Industrial and Other Employment Areas Map. Therefore, the subject area does not qualify for re-designation from General Industrial to High Density Residential/Residential

Multifamily High under this criterion. As indicated elsewhere, the parcels do qualify for re-designation based on other Metro Functional Plan Title 4 criteria.

- (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 land by a ratio of 1.5-to-1.

Finding: The home at 2352 Kingwood Street (tax lot 1N331DA07400) was built in 1920. Based on Washington County Assessment and Taxation Department data, the estimated assessed value of the improvement is \$2,000. The estimated assessed value of the land is \$343,480. As the value of the use is less than the value of the land, it does not exceed the 1.5-to-1 ratio.

The home at 2355 Kingwood Street (tax lot 1N332C000800) was built in 1900. Based on Washington County Assessment and Taxation Department data, the estimated assessed value of the improvement is \$118,440. The estimated assessed value of the land is \$159,590. As the value of the use is less than the value of the land, it does not exceed the 1.5-to-1 ratio.

The property at tax lot 1N331DA07500 is unimproved. The estimated value of the land is \$179,950. As there are no buildings on this parcel, the improved value does not exceed the 1.5-to-1 ratio.

Forest Grove Comprehensive Plan Policies

The proposed amendment is consistent with Forest Grove Comprehensive Plan Housing Policy 1.2 which states: "Evaluate requests for re-zoning from non-residential to residential development zones based on the following factors:

- (A) Identified housing needs contained in an adopted Goal 9 Analysis;
- (B) Ability to provide services in a cost-effective and efficient manner;
- (C) Potential of the site to support higher density development;
- (D) Site characteristics including topography; and
- (E) Land use location policies of the Comprehensive Plan."

Finding for Factor A: The City's Goal 9 Economic Opportunity Analysis shows a need for an additional 3,900 dwellings under the Baseline (2% annual growth rate) scenario and 4,737 dwellings under the Medium (2.3% annual growth rate) scenario. Re-designating these properties High Density Residential will help to meet this housing need.

Finding for Factor A: The City's 2019 Economic Opportunity Analysis shows an excess of industrial land over a 20-year planning period of 40 to about 197 acres (see Exhibit C). Thus, because these parcels total less than 5 acres in area, re-designating them to a non-industrial use would have minimal impact on the city's industrial land supply.

Finding for Factor B: The subject properties are located within a developed area of the city and are served by the full array of City services. An 8-inch sanitary sewer line, 21-inch storm sewer line, and 8-inch water line are all present in 25th Avenue at Kingwood Street. Given the presence of utilities, there is the ability to provide services in a cost-effective and efficient manner.

Finding for Factor C: The properties meet the location factors for high density residential development as indicated below. However, the size of 2355 Kingwood Street (0.45 acres) is a limiting factor, if it is developed independently of the others. Because it is less than 0.50 acres in size, it is exempt from the minimum density requirement as per Development Code §10.3.130(D) *Exemptions from Minimum Density Requirements*.

Finding for Factor D: The subject properties are flat with a slope of less than 5%. Topography is not a limiting factor for development of this area. In addition, the parcels are not irregularly shaped and are configured to allow for further development.

Findings for Factor E: Land Use Location Factors – High Density Residential

FACTOR	FINDING
Slope is less than 10%.	The subject site is flat with a cross-slope of less than 5%.
Carrying capacity of the land given the presence of wetlands, soil characteristics And infrastructure capacity.	The City's 1992 Wetland Inventory has documented a wetland on tax lot 1N331DA07400 (2352 Kingwood Street). There are no known wetlands on the other 2 parcels. The site is served by the full array of City services including water, storm sewer, sanitary sewer and electricity. Sufficient infrastructure capacity exists and urban development is assumed in the City's Water, Waste Water, Storm Drainage and Transportation Systems plans.
Sites are located within ¼ mile of planned or existing transit service.	The parcels are located within ¼ mile of the GroveLink east loop, which has a route on Hawthorne Street and 22 nd Avenue.
Sites are adjacent to existing or planned parks or open space.	No existing or planned parks are adjacent, but Stites Park is approximately ¼ mile from the site. The site is adjacent to open spaces located at Casey West Tract A, 2922 25 th Avenue and 2930 26 th Avenue.
Sites are within ¼ mile of designated employment areas.	The site is not located within ¼ mile of a designated employment area.
Constructed with single-family residential development if approved through planned residential development process.	No development is proposed. Therefore, this factor is not applicable.
Creation of nodes to facilitate transit extension.	This location is not part of a node intended to support transit service. Therefore, this factor is not applicable.

Zoning Map Amendments Review Criteria (DC §10.2.770)

1. The zone change is consistent with the Comprehensive Plan Map. When the Comprehensive Plan has more than one implementing zone as shown on the Correspondence Table in Article 3, it must be shown that the proposed zone is the most appropriate, taking into consideration the purposes of each zone and the zoning pattern of surrounding land.

Finding: If the properties are re-designated to High Density Residential, the RMH Multi-Family High Residential zone would be appropriate.

2. The zone change is consistent with relevant goals and policies of the Comprehensive Plan, as identified by the Director.

Finding: The proposed amendment is consistent with Forest Grove Comprehensive Plan Housing Policy 1.2 which states "Evaluate requests for rezoning from non-residential to residential development zones based on the following factors:

- A. Identified housing needs contained in an adopted Goal 9 Analysis;
- B. Ability to provide services in a cost-effective and efficient manner;
- C. Potential of the site to support higher density development;

- D. Site characteristics including topography; and
- E. Land use location policies of the Comprehensive Plan.”

Findings pertaining to consistency with the applicable Comprehensive Plan policies are provided above.

3. The zone change is consistent with the adopted Transportation System Plan. Development allowed by the zone change will not substantially impact the functional classification or operation of transportation facilities, or reduce the level of service of transportation facilities below the minimum acceptable level identified in the Transportation System Plan. To ensure proper review and mitigation, a traffic impact study may be required for the proposed zone change if it may impact transportation facilities.

Finding: The zone change is consistent with the adopted Transportation System Plan since development allowed by the proposed Residential Multi-Family High density zone will not substantially impact the operation of 25th Avenue or Kingwood Street. Both roadways are Local streets serving residential uses. The areas to the north and west are currently zoned Residential Multi-Family High density. The addition of 5 acres of multi-family zoned land should not significantly increase traffic volumes assumed in the TSP for this area, especially when the street network is completed.

Finding: The applicant submitted a traffic assessment prepared by a professional transportation planning and engineering firm. This assessment was based on the two eastern parcels which total 2.0 acres in area. The assessment reviewed the traffic implications of developing the properties under the General Industrial designation and under the RMH designation. The assessment modeled the traffic that would be generated by the highest trip generation rates (a call center and manufacturing) and compared that with the traffic that would be generated if the properties were developed at the highest residential density possible (20.28 DUA). The assessment notes that “traffic impacts are typically measured during p.m. peak hours....”

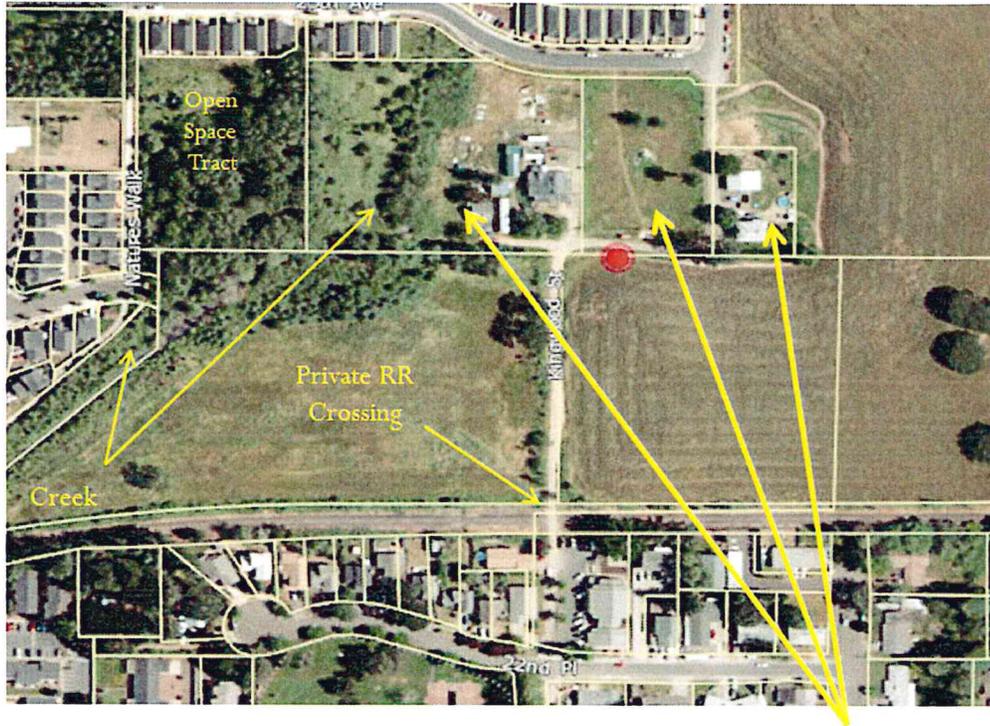
- Industrial average daily trips (ADT) would range from 171 (manufacturing) to 255 (a call center).
- Residential ADT would be 293.
- Evening peak hour trips would be 29 for manufacturing and 30 for a call center.
- Residential evening peak hour trips would total 22.

The study concluded that:

- “The proposed change would result in a net decrease in p.m. peak hour trip generation and as such the requirements of the TPR are met.”
- With the change, “the level of travel and access would be consistent with that of the surrounding streets.”

Finding: The parcels included in the traffic assessment total 2.0 acres in area. A third parcel - tax lot 1N331DA07400 – is also under consideration. It has a gross area of 3.06 acres. It is bisected nearly down the middle by a tributary of Council Creek. The tributary and 100-foot-wide buffer (50 feet on either side of the tributary) would be required to remain in a natural state, regardless of how the lot might develop. The parcel west of the tributary is also contiguous to a wetland and open space tract.

Because tax lot 1N331DA07400 is so bisected, development of its western portion would be problematic at best. For this reason, extrapolating anticipated traffic generation is based on the assumption that only half of the parcel (1.50 acres) could be developed.



Subject Parcels

At 1.5 acres, the area of this parcel is 75% of the 2.0-acre area included in the traffic assessment. Extrapolating from the forecasted numbers cited above, the anticipated traffic that could be generated from this parcel would be as follows -

- Industrial ADT would range from 128 (75% of the 171 ADT forecast for manufacturing) to 191 (75% of the ADT forecast for a call center).
- Residential ADT would be 220 (75% of the 293 ADT forecast for the adjacent sites).
- Evening peak hour trips would be 22 for manufacturing and 23 for a call center.
- Residential evening peak hour trips would total 17.

Combined with the other two parcels, the totals would be -

- Industrial ADT would range from 299 (for manufacturing) to 446 (for a call center).
- Residential ADT would be 513.
- Evening peak hour trips would be 51 for manufacturing and 53 for a call center.
- Residential evening peak hour trips would total 39.

Development of tax lot 1N331DA07400 for high density residential use would still result in a net decrease in p.m. peak hour trip generation (39 trips versus 51-53 trips for industrial uses). As such, including tax lot 1N331DA07400 would still comply with the requirements of the TPR and the level of travel and access would remain consistent with that of the surrounding streets.

4. Public facilities and services for water supply, sanitary waste disposal, storm water disposal, and police and fire protection are capable of supporting the uses allowed by the zone. Adequacy of services is based on the projected service demands of the site and the ability of the public services to accommodate those demands.

Finding: The subject properties are located within a developed area of the city and are served by the full array of City services. An 8-inch sanitary sewer line, 21-inch storm sewer line, and 8-inch water line are all present in 25th Avenue at Kingwood Street. The proposed amendment would not be anticipated to create any greater demand for public facilities and other public services than that which would be demanded under the existing industrial designation.

5. The establishment of a zone district is not subject to the meeting of conditions.

Finding: No conditions of approval are proposed.

VI. ALTERNATIVES

The Planning Commission has the following alternatives:

1. Recommend approval of the Comprehensive Plan Map and Zoning Map amendments as proposed; or
2. Recommend approval with modifications; or
3. Recommend denial; or
4. Continue deliberations to a date certain.

VII. SUMMARY AND RECOMMENDATION

The proposed Comprehensive Plan Map and Zoning Map amendments meet the requirements of the applicable decision considerations, standards and criteria as described above. Therefore, staff recommends that the Planning Commission forward the application to the City Council with a positive recommendation.

VIII. LIST OF EXHIBITS

The following attachments are part of the staff report and entered into the record as evidence for this application at the time this staff report was written. Exhibits received after the date of this report will be marked beginning with the next consecutive letter and will be entered into the record at the time the public hearing is opened, prior to oral testimony.

- Exhibit A** Map of the proposed Comprehensive Plan and Zoning Amendments
- Exhibit B** Applicant's Submittal
- Exhibit C** Excerpt from the 2019 Economic Opportunities Analysis
- Exhibit D** PowerPoint Slides

EXHIBIT A

Proposed Comprehensive Plan Map

And

Zoning Map Amendments

Proposed Map Amendments

Comprehensive Plan Map Amendment - General Industrial to High Density Residential
Zoning Map Amendment - General Industrial to Residential Multi-Family High Density



Comprehensive Plan Designations: HDR = High Density Residential GI = General Industrial
Zoning Designations: RMH = Residential Multi-Family High Density GI = General Industrial

EXHIBIT B

Applicant's Submittal

SURROUND



January 13, 2019

Comprehensive Plan Map and Zoning Map amendment application narrative for parcels 1N332C000800 and 1N331DA07500

1. Application overview

- a. Applying parties- see attached application forms
- b. Tax lots- see attached tax lot maps.
- c. General overview
- d. attachments

This proposal seeks to amend the Comprehensive Plan and Zoning maps, to revise the land use designation from Industrial use, to High Density Residential (RMH). These parcels are more suitable and meets the city criteria and requirements for infill residential and much less suitable for Industrial uses. The factors involved:

Residential use:

- Has adequate road, utilities and infrastructure adjacent, and able to serve it.
- Has a significant demand beyond the supply.
- Has a small size suitable for infill residential development.
- Would likely facilitate further construction of connecting roads through dedications, and frontage improvements.
- Is more compatible with the existing high density residential use to the north.
- Add much more revenue to the city property tax base.

Industrial use:

- Requires significant new roads and infrastructure.
- Is too small for most modern industrial uses.
- Is incompatible and creates conflicts with the existing high density use to the north.
- The economics of Industrial use land value make development unlikely, given the costs to build on such a small lot.

Recently the City of Forest Grove analyzed both the need for affordable housing (Affordable Housing Strategy) and separately, and the land inventory for employment

uses (Economic Opportunities Analysis). Subsequently, Forest Grove City Planning presented these facts to City Council,

“Over the last 9 years, population in the City of Forest Grove has grown by 8.7% (21,500-23,555). In contrast, employment in Forest Grove has increased 1.5% over the same period.

The general consensus is there is a deficiency in affordable housing/suitable land for residential development, and a surplus of land inventory for employment uses. These trends are diverging into the foreseeable future. We believe that the City has performed adequate analysis with the recent Economic Opportunities Analysis Update, to meet the Metro criteria for comprehensive plan change; specifically, that there is a surplus of land zoned for employment, and that this small amendment wouldn't reduce the immediate or long-term employment capacity of the City of Forest Grove. The 20 year projected need of Industrial Lands is 40-48 acres. The current Industrial Land supply in the City is 237 acres. A change of approximately 2.5 acres Industrial Land to Residential would have virtually no negative impact on the 20 year need of Industrial Land for employment. These City planning efforts, as well as the action to revise the Comprehensive Plan and Zoning maps, are also consistent with the State of Oregon Land use requirements to plan adequately and balance for both affordable housing and economic development. We believe that this proposal will meet the State and Metro goals, better than the Status Quo.

2. Comprehensive Map change approval criteria

a. Consistency with Comprehensive Plan policies

- i. Housing Goals and Policies: Goal 1 “Ensure an adequate supply of developable land to support needed housing types and a complete community”

Policy 1.1 and 1.2 -These parcels are suited for the RMH zone:

- less than 10 % slope. These parcels are both much less than 10% slope.
- meets demands for affordable housing types. As stated in the City of Forest Grove Affordable Housing Strategic Plan for findings.
- there is capacity and immediate cost-effective availability of utilities and services in the adjacent street frontages, brought to the frontage by the “Casey Meadows” development. This was confirmed during our pre-application conference.
- the parcels are adjacent to existing RMH zone, and would simply expand that area.
- the parcels are close to downtown and other services, suitable for high density housing.

b. Consistency with Metro Regional Framework Plan

- i. Land use- This proposal as noted would balance providing additional housing land supply, while acknowledging that there is a surplus of land

- for employment uses. The City of Forest Grove has provided adequate analysis of demands and land supply to make these changes.
- ii. Transportation- This proposal will meet the requirements of Metro transportation goals, as a incremental addition to the systems already in place. The uses proposed are readily served by existing roads and systems. Conversely, the existing zoning uses would have inadequate roads to support industrial development.
 - c. Consistency with Metro Urban Growth Management Functional plan
 - i. Title 1 housing capacity-no reductions in housing capacity are proposed.
 - ii. Title 4 industrial and employment areas- This metro title allows for the changes of use providing certain criteria are met, as noted within the functional plan:

3.07.450 Employment an Industrial Area

(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 a demonstration that:

- d. (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;

-These combined parcels are not surrounded by Industrial land and they abut complementary and compatible high density residential development to the north.

- e. (2) The amendment will not reduce the employment capacity of the city or county;

- We believe that the City has performed adequate analysis with the recent Economic Opportunities Analysis Update, to meet the Metro criteria for comprehensive plan change; specifically, that there is a surplus of land zoned for employment, and that this small amendment wouldn't reduce the immediate or long- term employment capacity of the City of Forest Grove.

- f. (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;

-The parcels are not Regionally significant Industrial Area (Metro Title 4, Industrial and Other Employment Area Map).

- g. (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;

-See attached Traffic Impact Letter- The proposed uses would improve transportation system performance over the existing uses. The residential traffic would be able to safely travel on the existing residential streets. Industrial traffic would actually be incompatible and unsafe trying to maneuver through the existing residential neighborhood streets.

- h. (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

-The proposed residential uses would have no negative effect above functions. Residential development of these parcels would support the commercial and service uses found in the nearby Town Center Core and Town Center Transition zones.

- i. (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.

-The parcels are much less than 10 acres, approximately 2.5 acres in size.

As shown, the map amendment is in compliance with Metro Title 4 and the City of Forest Grove would have the ability and required supporting analysis to amend its comprehensive plan as proposed.

d. Consistency with Oregon Statewide Land Use Planning Goals.

The City of Forest Grove has completed diligent analysis of planning issues to assist in meeting statewide goals, and those reports inform this proposal. The proposed amendment is consistent and better meets the Oregon planning goals, as noted:

I. GOAL 2 LAND USE PLANNING- An amendment to the comprehensive plan is allowed by State of Oregon rules. The city would be required to provide a Post-Acknowledgement Plan Amendment (Papa)

II. GOAL 9 ECONOMIC DEVELOPMENT- This proposal would not adversely affect the economic development of the City as noted above. The noted Economic Opportunities Analysis Update confirms the City's requirement to plan for economic development and realign land use maps accordingly, in this case, noting the surplus of industrial land. The 20 year projected need of Industrial Land is 40-48 acres. Forest Grove's existing Industrial Land supply is 237 acres (Johnson Economics). Therefore, there would virtually be not adverse effect to employment.

III. GOAL 10 HOUSING- This proposal would provide much needed housing land inventory, consistent with Goal 10. The City has analyzed and noted a deficit of suitable housing land, as noted by the Forest Grove Affordable Housing Strategic Plan. The 2015 Metro Regional Inventory found a need for 14,000 affordable housing units in Washington County. Of that need 1,400 exist in the City of Forest Grove.

IV. Goal 11 PUBLIC FACILITIES AND SERVICES- This proposal does not alter the City's planning for public facilities and or services. The City has adequate planning in place to allow these plan map amendments.

V. Goal 12 TRANSPORTATION- This proposal includes a Transportation Analysis Letter, (TAL), that shows the proposal addresses and complies with the City Transportation Plan, which addresses State Goal 12.

The other State Goals are not relevant to this proposal.

3. Zoning map change approval criteria

- a. Consistency with Comprehensive plan. The proposal includes an amendment to the Comprehensive plan, and if approved, the zone change would be consistent.
- b. Consistency with the goals and policies of the comprehensive plan. See above section 2, as the comprehensive plan would be amended.
- c. Suitability:
 - i. The site is suitable for the proposed zone and use. The proposed land use designation is the same as the adjacent development "Casey Meadows". Roads and utilities are in place up to the site, adequate for immediate development.
 - ii. There is a lack of appropriate alternatives for housing of this type. As stated in the City of Forest Grove Affordable Housing Strategic Plan, which notes a lack of suitable sites.
 - iii. The site is less suitable for the current zoned use, due to a lack of roads, infrastructure, and economic impetus.
- d. The site is consistent with the transportation system plan. As demonstrated in the attached transportation analysis letter.
- e. Public facilities and services are currently capable of serving the proposed uses. The proposers met with City staff and was informed that all utilities are in place to the site. The City Storm water system was designed to accommodate these parcels when the "Casey Meadows" development occurred on the adjacent parcel. The first responders stated they would endorse this proposal.
- f. The establishment of a zone district is not subject to the meeting of the conditions.

Conclusion: In conclusion our proposed map amendment creating approximately 2.5 acres of High Density Residential land would provide for short term construction jobs and long term increased tax revenue for the City. As demonstrated by the City's Economic Opportunities Analysis there is a large surplus of Industrial Lands in Forest Grove. The loss

of approximately 2.5 acres of Industrial Land would virtually have no effect on the 20 year industrial and Employment need. Residential use on these parcels would create a development that would complement and be compatible with the abutting residential neighborhoods to the north.

4. Attachments

- a. Application form
- b. Tax lot plans
- c. Transportation analysis letter.
- d. Publics works plans of utilities at parcels.



December 13, 2018
#01578

Mark VanderZanden
Surround Architecture
503-224-6484 office
503-789-7388 mobile

re: Transportation Planning Rule – Traffic Assessment Letter for an 2.0 Acre Zone Change – Forest Grove, OR

INTRODUCTION & SUMMARY

As requested, we have prepared this traffic-assessment letter a for a proposed rezone/comprehensive-plan map amendment for a 2.0 acre site in Forest Grove, Oregon. The site is located as shown in Figure 1. The purpose of this letter is to present the analysis of the proposed change under Oregon's Transportation Planning Rule (TPR). It was found that the proposed change would result in a net decrease in p.m. peak hour trip generation and as such the requirements of the TPR are met. This report details how this conclusion was reached.

DESCRIPTION OF PROJECT

The land-use application is for a change in the zoning and the comprehensive-plan map designation. The proposed zone change is from GI, General Industrial to RMH, Residential Multifamily High (which is called High Density Residential in on the comprehensive plan map).

The site consists of two parcels. The smaller 0.45 acre parcel (Tax map 1N332C000800) is currently occupied by a single family home. The larger 1.48 square foot lot (Tax Map 1N331DA07500) is currently vacant. The parcel sizes shown in the tax maps (as shown above) are slightly smaller than what is calculated using the dimensions shown on the tax map. To be conservative, it was assumed that the total size would be 2.0 acres.

This application is not being submitted concurrently with site plan application. As such, no preliminary site plans have been developed. Assumed densities and land uses discussed below.

LAND USE ASSUMPTIONS

The standard accepted practice for a TPR assessment is to compare the worst-case trip generation scenario for the existing designation with the proposed designation. The following shows how these assumptions were developed.

The maximum density in an RMH zone is 20.28 units per acre. For the purposes of density calculations, it was assumed that future streets running through the site would be included in the density calculations. This is a conservative (high) approach and would allow for a maximum of 40 units. At this density, if a road is built through the site, the resulting building-type would need to be apartments in order to achieve this density. No other outright-permitted uses were identified which would have a higher trip generation. This use and intensity reflects a reasonable assumption to use for the maximum trip generation calculations.

Under existing zoning (GI), a number of uses were reviewed to determine the maximum trip generation. Reasonable outright permitted uses reviewed included:

- Research and Development;
- Light Industrial;
- Manufacturing; and,
- Call Centers.

Given that a maximum coverage of 50 percent is allowed, and that it would be possible to construct 2 story buildings within the current height limits, a floor-area-ratio (FAR) of 0.50 to 1.00 could be achieved. To be conservative, the lower FAR of 0.50 was assumed. This would allow for buildings totaling up to 43,560 square feet to be constructed. For call centers, additional parking would be needed to accommodate the greater employee densities of this land use. For this reason, a lower FAR of 0.30 was assumed for the call center.

TRIP GENERATION – PROPOSED ZONING/MAP DESIGNATION

Future trips generated by the project were forecast using the trip generation rates found in the 10th Edition of the *Trip Generation Manual* (ITE, 2017). ITE Land Use Category 220, Multifamily Housing (Low-Rise) was selected. As shown in Table 1, the site could generate a maximum of 22 p.m. peak hour trips and 293 daily trips under the proposed zoning/map designation.

TABLE 1 – TRIP GENERATION FORECAST – WITH PROPOSED CHANGE

ITE LAND USE*	TRIP ENDS RATE (trips per tsf)		IN/OUT SPLIT (percent)	SIZE (units)	PM PEAK HOUR TRIP ENDS			
	DAILY	PM PEAK HOUR			IN	OUT	TOTAL	DAILY
	220	7.32	0.56	63/37	40	14	8	22

Notes: *Source: *Trip Generation* (ITE, 10th Edition, 2017), land use code 220, Multifamily Housing (Low Rise).

TRIP GENERATION – EXISTING ZONING/MAP DESIGNATION

The ITE Land Use Categories listed above and their respective p.m. peak hour trip rates are:

- Light Industrial – 0.63 trips per thousand square feet;
- Manufacturing – 0.67 trips per thousand square feet;
- Research and Development – 0.49 trips per thousand square feet;
- Call Center (office) – 1.15 trips per thousand square feet;

While a call center has the highest trip rate, the parking needs of a call center are typically higher than other uses allowed in the zone, as they tend to have more employees per square foot than uses such as manufacturing or industrial. This would result in a lower floor-area-ratio, which would push the total trip generation of the site down. For this reason, the use with the second highest trip generation rate, Manufacturing, was also selected for evaluation.

As shown in Table 2, the outright permitted land use with the highest trip generation potential would be a call center. As such, the site has the potential to generate a 30 p.m. peak hour trips and 255 daily trips under the existing zoning/map designation.

TABLE 2 – TRIP GENERATION FORECAST – EXISTING ZONING/MAP DESIGNATION

ITE LAND USE*	TRIP ENDS RATE (trips per tsf)		IN/OUT SPLIT (percent)	SIZE (t.s.f.)	PM PEAK HOUR TRIP ENDS			
	DAILY	PM PEAK HOUR			IN	OUT	TOTAL	DAILY
	140	3.93	0.56	63/37	43.56	9	20	29
710	9.74	1.15	16/84	26.14	5	25	30	255

Notes: *Source: *Trip Generation* (ITE, 10th Edition, 2017), land use code 220, Multifamily Housing (Low Rise).

NET IMPACT – CHANGE IN TRIP GENERATION

The horizon year for a TPR evaluation is typically the planning horizon used in the Transportation System Plan (TSP), but is generally accepted that it must be at least 15 years from the current year. The net change in trip generation during this time period, as shown below in Table 3, would be a net reduction

of 8 p.m. peak hour trips and a net increase of 38 daily trips. Since traffic impacts are typically measured during p.m. peak hours, it was determined that the proposed change would have a net decrease in trip generation. (Sometimes traffic impacts are also measured during the a.m. peak hour as well, but trip generation is greater in the p.m. peak hour for the land uses considered herein.)

TABLE 3 – NET IMPACT OF PROPOSED CHANGE

ZONING/MAP DESIGNATION	PM PEAK HOUR	
	TRIPS	DAILY TRIPS
RMH (Proposed)	22	293
GI (Current)	30	255
Net Change	-8	38

TPR ASSESSMENT

According to OAR 660-012-0060, the impact of the proposed amendment would have a "significant effect" if any of the following TPR criteria are met:

- "(A) Types or levels of travel or access that is inconsistent with the functional classification of an existing or planned transportation facility;*
- (B) Degrade the performance of an existing or planned transportation facility such that it would not meet the performance standards identified in the TSP or comprehensive plan; or*
- (C) Degrade the performance of an existing or planned transportation facility that is otherwise projected to not meet the performance standards identified in the TSP or comprehensive plan."*

Criterion A is not met, since the level of travel and access would be consistent with that of the surrounding streets. The proposed change would result in a reduction of traffic and as such would not have a significant effect under this criterion.

Criteria B and C are not met, since there would be a reduction in traffic with the proposed change and the proposed land use. The proposed change would not have a significant effect under these criteria.

Since none of these three criteria are met, the impact of the proposed change would not have a "significant effect" on the transportation system. Further action is not required, and the requirements of the TPR would be met.

SUMMARY AND CONCLUSIONS

1. As shown in Table 3, there would be a net decrease p.m. peak hour trips to the site with the proposed changes.
2. It was concluded that the proposed change from GI to RMH would not have a significant effect on the transportation system as per TPR criteria and as such, the requirements of the TPR are met.
3. At such time that the applicant moves forward with a site plan, a traffic stound would not be required since the site would generate less than 30 p.m. peak hour trips.

* * * * *

It is trusted that the above analysis adequately addresses the question of trip generation and assessment of the impacts under the Oregon Transportation Planning Rule for the proposed change in zoning and change the map designation found in the Forest Grove comprehensive plan. Please feel free to call at your convenience if you would like to discuss any elements of this letter-report.

Very truly yours,
FERGUSON & ASSOCIATES, INC.

Scott Ferguson, PE

Attachment: Figure 1



EXPIRATION DATE: 12/31/19

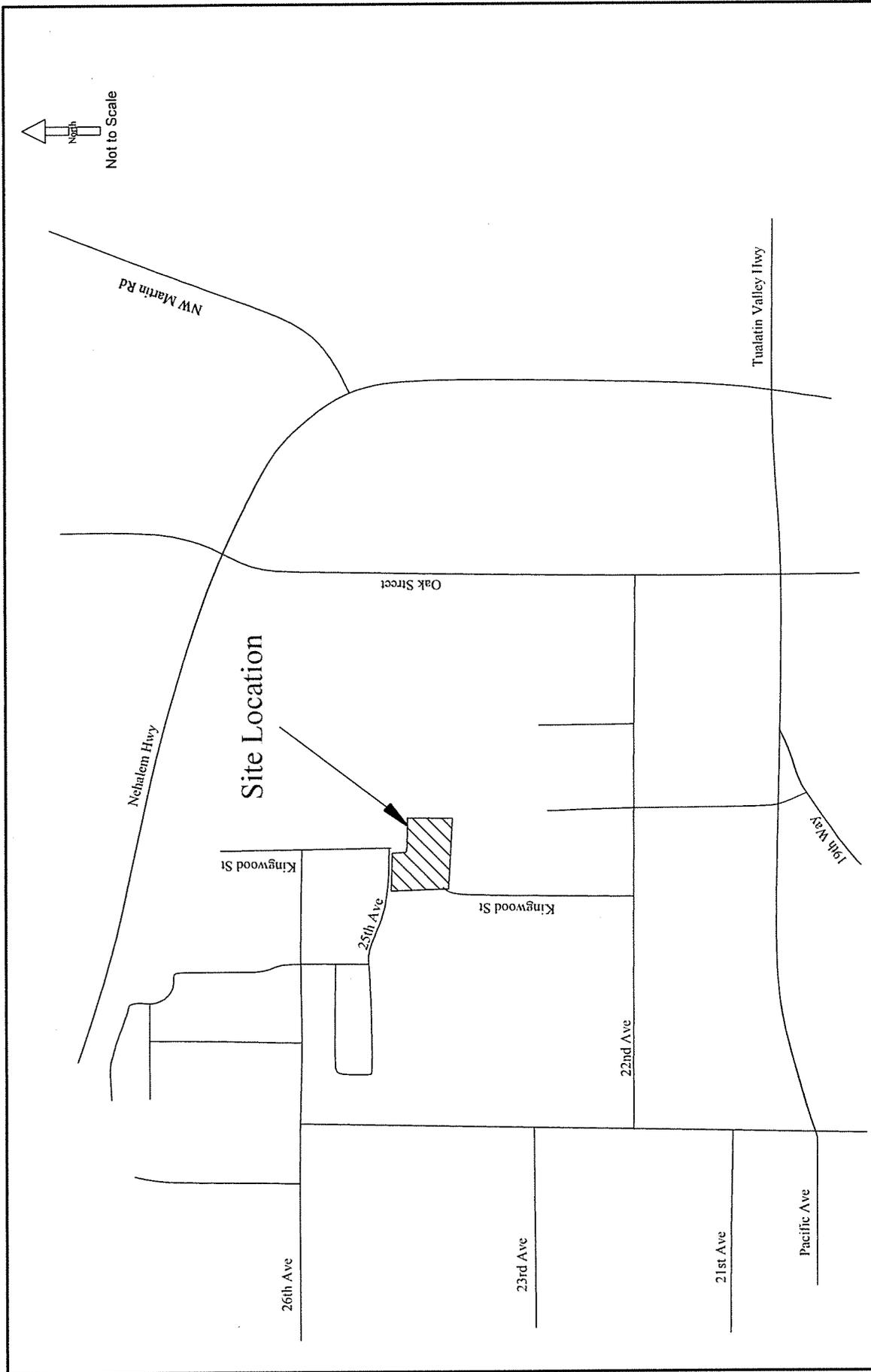
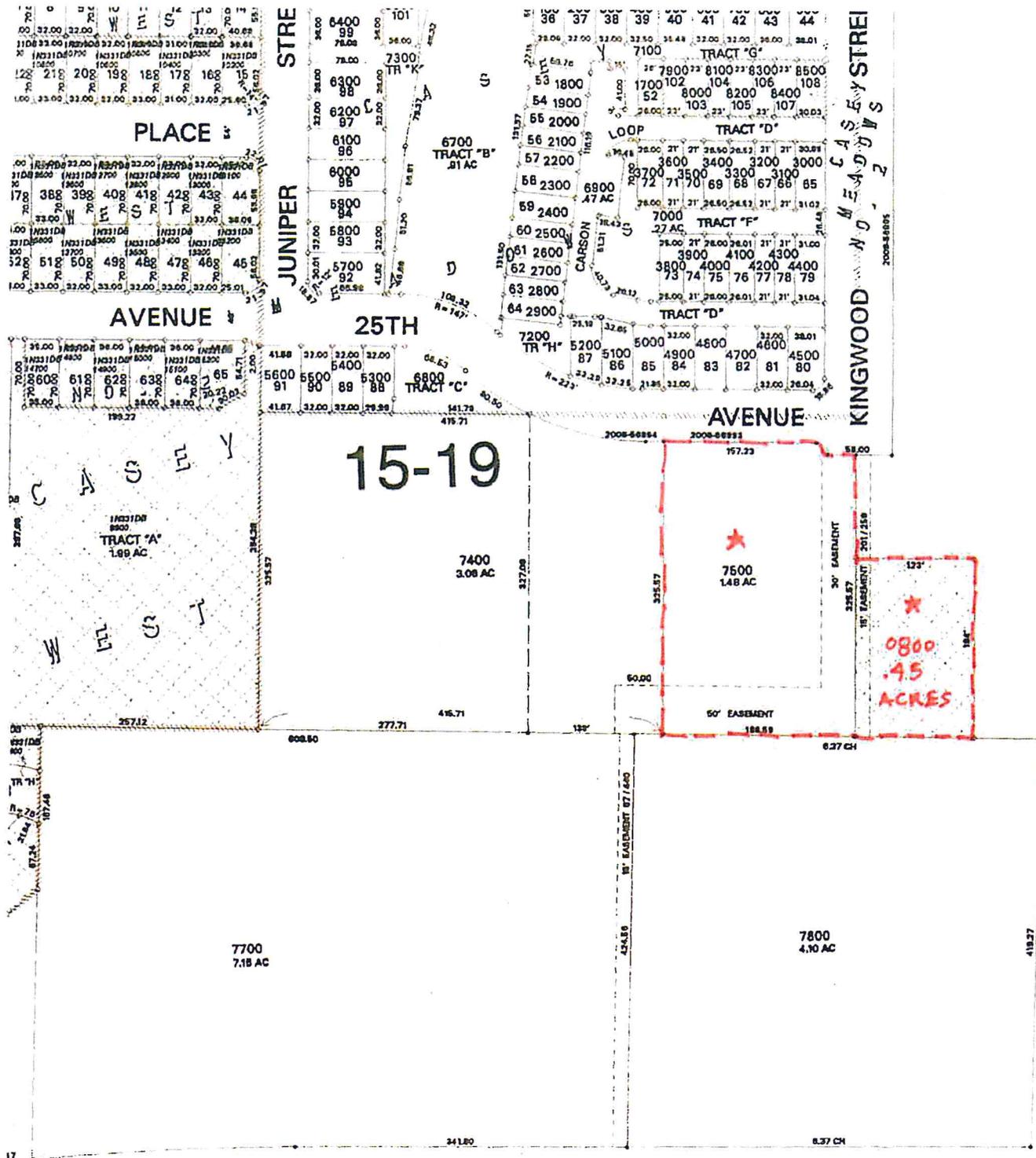
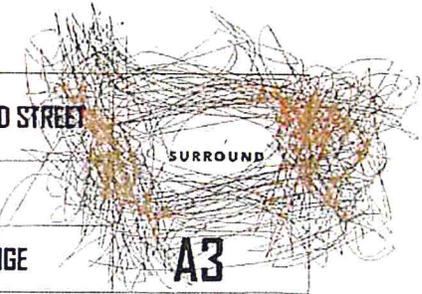


Figure 1
Ferguson & Associates, Inc.

Site Location
Forest Grove Rezone - Forest Grove, Oregon



project	KINGSWOOD STREET
issue date	09.21.2018
ref. dwg.	ZONE CHANGE
surround architecture, inc. - portland, or - 503.224.6484	
© 2013 surround architecture, inc.	



SURROUND

A3

EXHIBIT C

Excerpt

From The

2019 Economic Opportunities Analysis

VII. RECONCILIATION OF LAND NEED AND SUPPLY

Figure 7.1 presents the reconciliation of the findings of 20-year employment land need (Section V) with the estimated supply of buildable lands (Section VI).

Figure 7.1: Reconciliation of 20-Year Demand and Supply

SAFE HARBOR FORECAST

LAND USE	DEMAND		SUPPLY	Surplus or Deficit	
	Safe Harbor Forecast		Buildable		
	5-year	20-year	Acres	5-year	20-year
Industrial Land	9	40	237.1	228	196.75
Mixed-Use Land	33	146	55.0	22	(91.15)
TOTAL:	42	186	292.1	250	105.60

METRO 2040 (TAZ) FORECAST

LAND USE	DEMAND		SUPPLY	Surplus or Deficit	
	Metro 2040 Forecast		Buildable		
	5-year	20-year	Acres	5-year	20-year
Industrial Land	11	48	237.1	226	189.16
Mixed-Use Land	37	170	55.0	18	(114.55)
TOTAL:	48	217	292.1	244	74.60

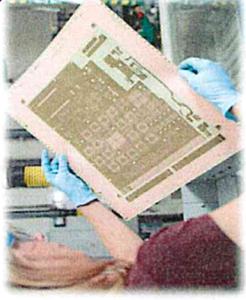
Source: Metro, City of Forest Grove, Johnson Economics

Major Findings

- Current buildable land supply is estimated to be sufficient to meet short term needs, but not long term needs.
- Over the 20-year period, the buildable supply does exceed the long term demand. However, this analysis finds that the classification of available land (mostly industrial) is a poorly matched to future employment needs.
- The demand for Mixed Use lands to accommodate commercial uses will exceed the supply of these land categories over the planning period.
- Many of the same types of uses (office and retail) can be suitable to either Commercial or Mixed Use land, so the balance between these two zoning types are somewhat fungible. In other words, some of the estimated demand for new land could be accommodated by new commercial or mixed use land, or a mix.
- This analysis indicates that there may be a significant oversupply of designated industrial land in Forest Grove, and that some of this might be repurposed for other employment uses.

EXHIBIT D

PowerPoint Slides



Planning Commission Meeting April 1, 2019

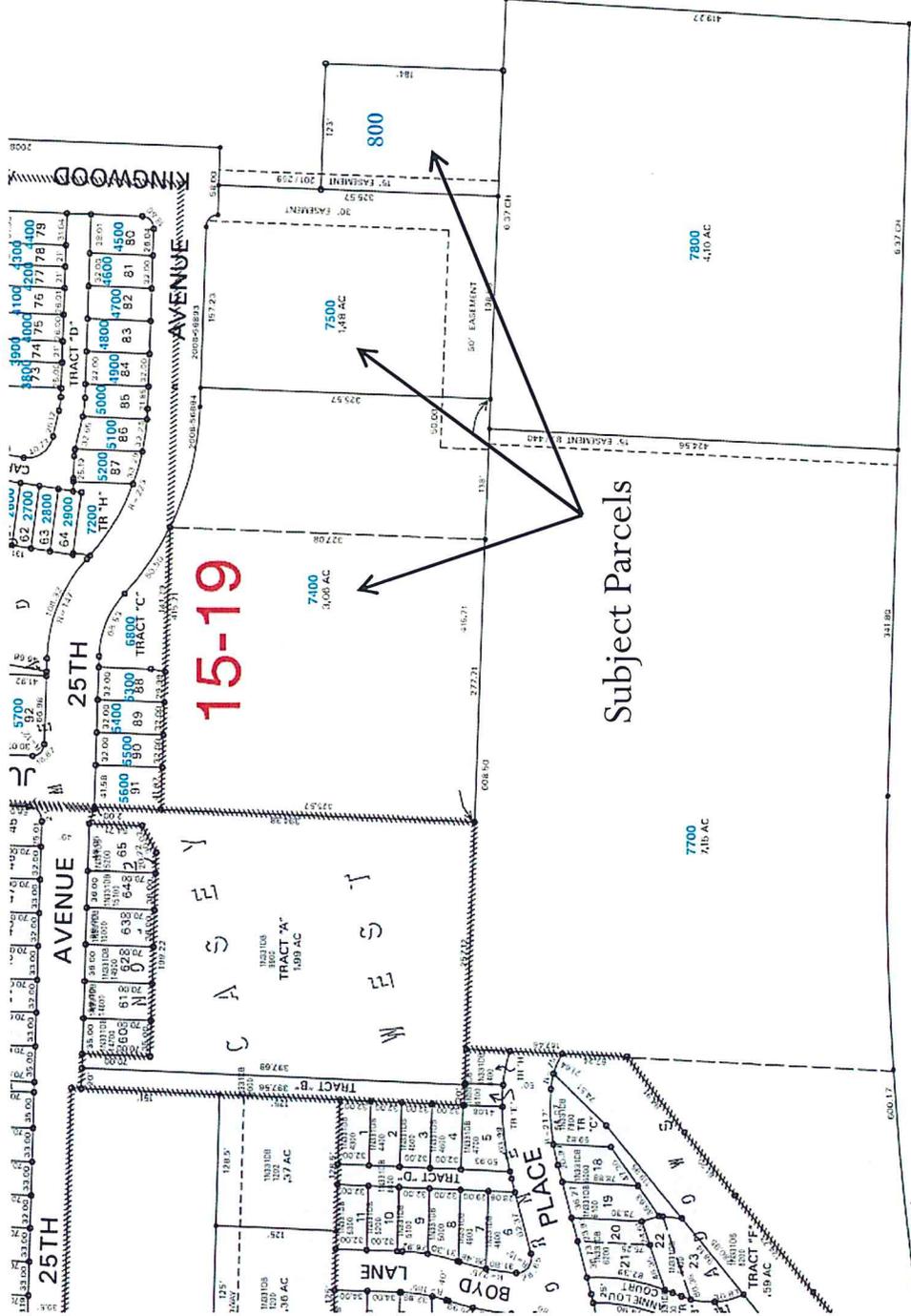
KINGWOOD STREET AREA COMPREHENSIVE PLAN MAP AND ZONING MAP AMENDMENTS

James Reitz (AICP), Senior Planner

A place where families and businesses thrive.



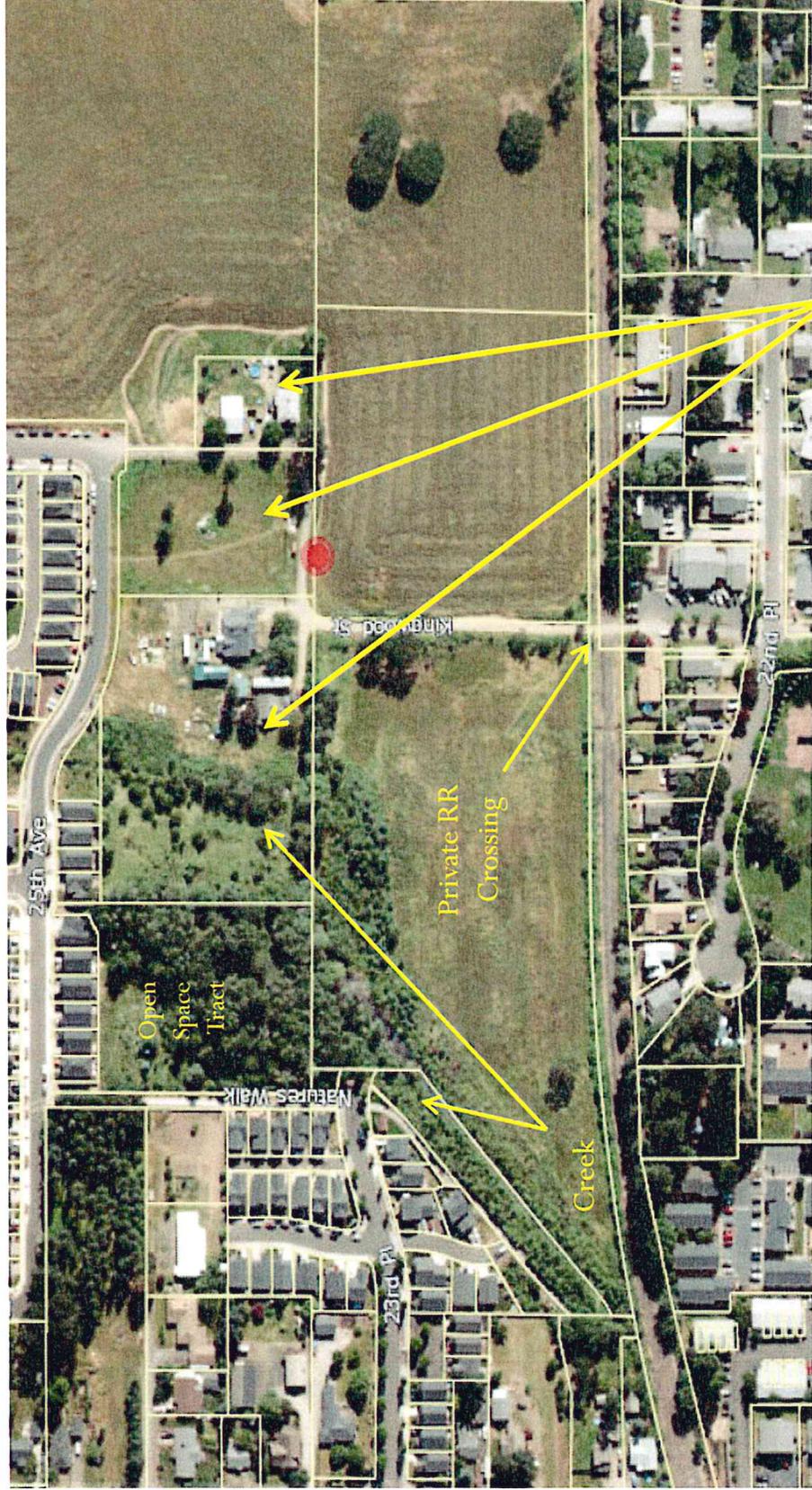
Washington County Tax Lot Map



A place where families and businesses thrive.



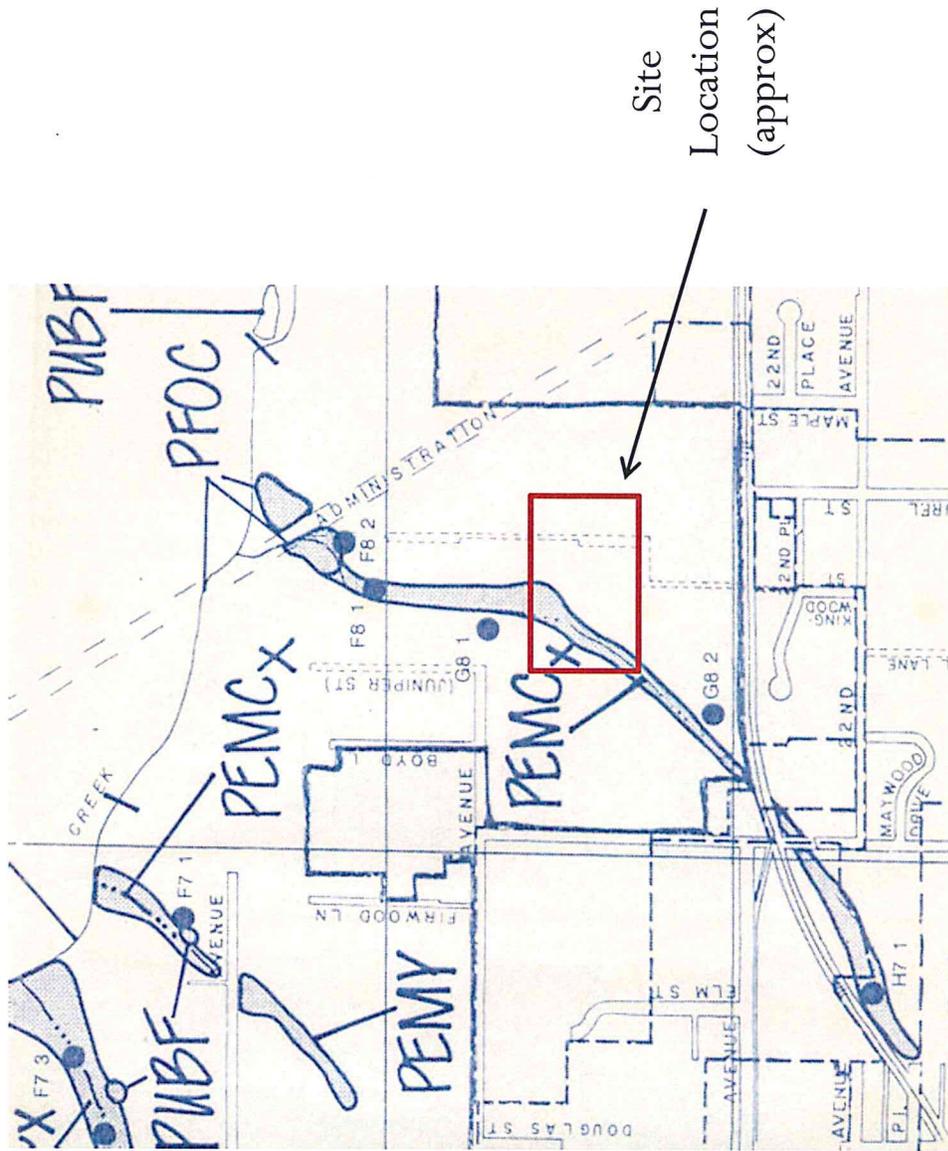
Aerial View - Site & Neighborhood



Subject Parcels

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Wetland Map



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Area Street Plan

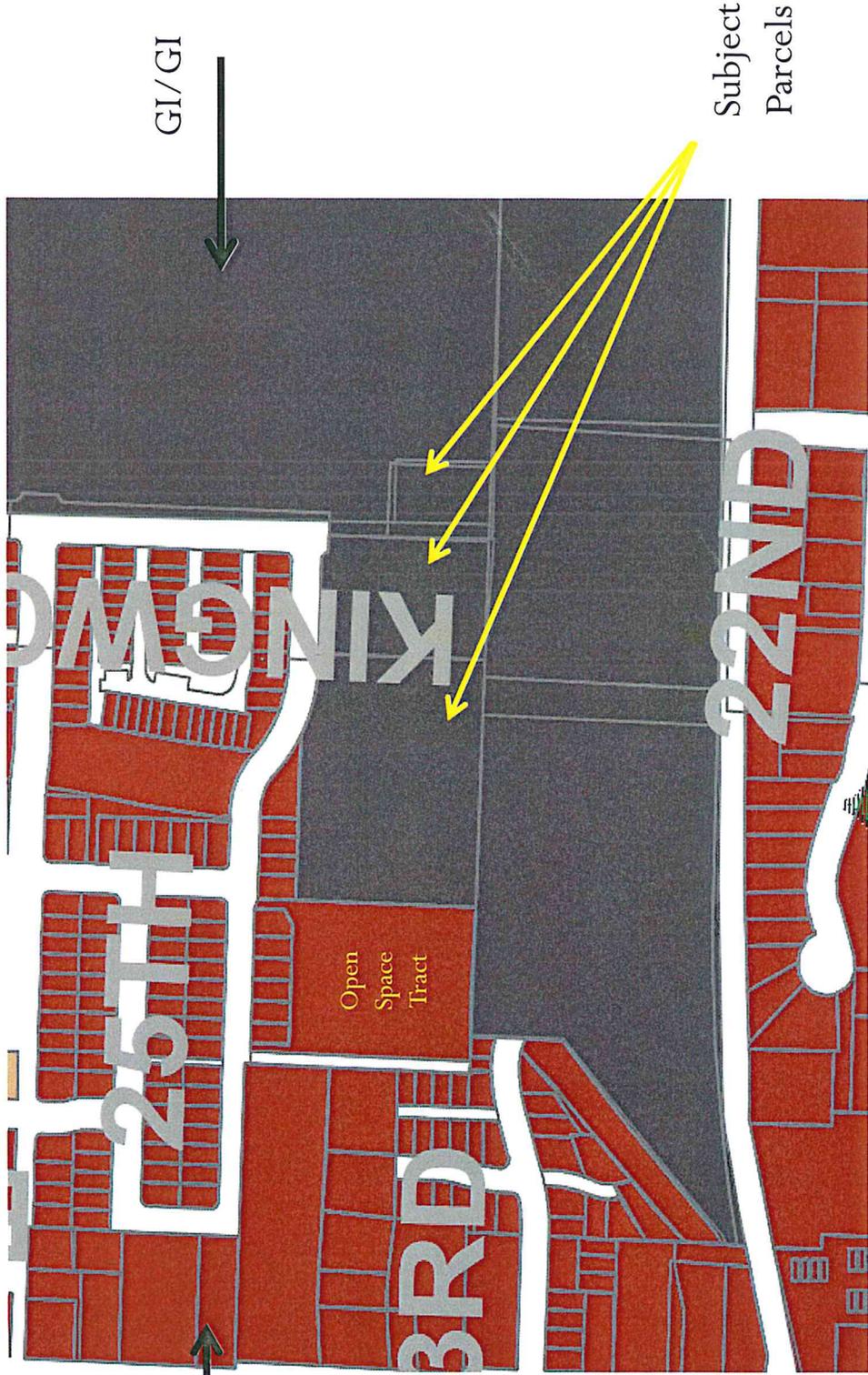


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Proposed Map Amendments

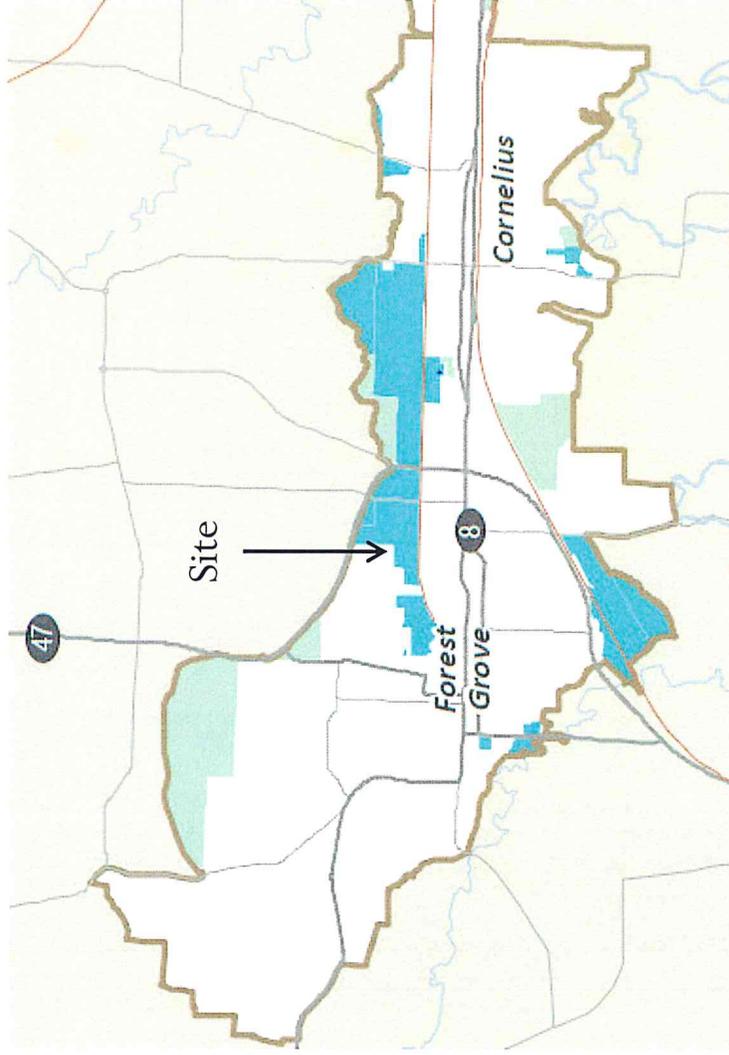
Comprehensive Plan Map Amendment - General Industrial to High Density Residential
Zoning Map Amendment - General Industrial to Residential Multi-Family High Density



Comprehensive Plan Designations: HDR = High Density Residential GI = General Industrial
Zoning Designations: RMH = Residential Multi-Family High Density GI = General Industrial

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Metro Title 4 - Industrial & Other Employment Areas



Employment areas

Industrial areas

Regionally significant industrial areas

A place where families and businesses thrive.



Summary and Recommendation

- The proposed Comprehensive Plan Map and Zoning Map amendments meet the requirements of the applicable decision considerations, standards and criteria.
- Therefore, staff recommends that the Planning Commission forward the application to the City Council with a positive recommendation.

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