

Ord. No. 490  
Exhibit A

# North Plains Urban Growth Boundary Expansion: Final Report

May 2023



# Acknowledgements

## **City Council**

Mayor Teri Lenahan  
Russ Sheldon  
Robert Kindel  
Cameron Martinez  
Ricky Smith  
James Fage  
Trista Papen

## **Planning Commission**

Stewart King, Chair  
Heather LaBonte, Vice Chair  
Tom Hauth  
Douglas Nunnenkamp  
Mike VanDomelen  
John Vater  
Lonnie Knodel

## **Project Advisory Committee**

Mayor Teri Lenahan  
Commissioner Stewart King  
Commissioner Lonnie Knodel  
Commissioner Doug Nunnenkamp  
Charlie Hopwell  
Eric Lawson, Economic Development Committee  
Anne Debbaut (DLCD)  
Kevin Young (DLCD)  
Jessica Pelz (Washington County),

## **City Staff**

Andy Varner, City Manager  
Bill Reid, Finance Director  
Blake Boyles, Public Works Director

## **Consultants**

3J Consulting  
Kittelson & Associates  
PR Land Use Strategies

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# 1. Introduction

North Plains is one of the fastest growing communities in Washington County. According to Portland State University’s Population Research Center, the City’s population is expected to nearly double by 2035. North Plains’ North and East Urban Growth Boundary (UGB) Expansion Areas were annexed in 2017 so that the UGB and city limits are now contiguous, leaving the City without any UGB expansion areas to meet emerging employment and housing land needs.

The City’s 2017, updated in 2022, Housing Needs Analysis (HNA) identifies a need for 167 acres of land, to meet residential demands through 2037, including land for parks and infrastructure. The 2018 Economic Opportunities Analysis (EOA), updated in 2022, identifies a need for 515 acres to meet industrial land needs and 172 acres to meet commercial land needs through 2038, including land for infrastructure. Combined, these studies estimate a need for 854 acres to meet the city’s 20-year land need.

This UGB Expansion Report follows the guidance provided by Statewide Planning Goal 14 (Urbanization), which incorporates the requirements of ORS 197A.300 to 197A.325 Amendment of Urban Growth Boundary Outside Metro. The report answers the following questions to justify a UGB expansion for North Plains:

1. Is any additional land needed for one or more urban uses, and if so how much?
2. If additional land is needed, how much can be accommodated within the current UGB?
3. If additional land is needed outside the UGB, where is the best place to expand the boundary?
4. What other amendments are needed to comply with the statewide planning goals?

## Policy Framework

Urban growth boundary expansions in Oregon are guided by Statewide Planning Goal 14: Urbanization. The 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.”

To amend an urban growth boundary, a city must complete a location analysis, comparing alternative locations and considering which addition to the UGB will result in the most accommodating and cost-effective boundary, while creating the fewest conflicts with neighboring land uses, and causing the fewest negative environmental and economic impacts.

Through discussions with staff from the Department of Land Conservation and Development (DLCD), the City determined that the Standard Method for UGB expansions best suits North Plains. The Standard Method is governed by Oregon Administrative Rule (OAR) 660-024. The rule regulates

how to establish a study area to evaluate land for inclusion in the UGB and the priority of land for inclusion in the UGB. In addition, the four boundary location factors of Goal 14 must be applied. These rules will be described in greater detail later in the report.

The 2004 *Washington County – North Plains Urban Planning Area Agreement* establishes (1) a site-specific Urban Planning Area within which both the County and the City maintain an interest in comprehensive planning, (2) a process for coordinating comprehensive planning and development in the Urban Planning Area, and (3) a process to amend the Urban Planning Area Agreement (UPAA). The UPAA stipulates the procedure for amending the UPAA and/or the Urban Planning Area Boundary including the responsibilities of each jurisdiction.

The North Plains Comprehensive Plan governs UGB expansions. Objective 1 of the Urbanization chapter calls for the City “to identify and utilize accepted growth management techniques in a manner that will implement the Comprehensive Plan vision statement, goals, objectives, and policies.” Subsequent policies guide the City’s efforts to maintain and amend the UGB.

The proposed UGB amendment must be approved by the City of North Plains and Washington County and then by DLCD.

## Process Overview

The North Plains UGB Expansion Report provides information to meet the following steps in the UGB expansion process:

1. Establish Land Need
2. Establish Study Area
3. Analyze Study Area
4. Evaluate Urbanization Potential
5. Review and Acknowledgement

The UGB Expansion project was initiated in August 2020 and completed in March 2023. A Project Advisory Committee (PAC) was convened to guide the process and make recommendations for Planning Commission and City Council consideration. The PAC met eight times over the course of the project. All meetings were noticed and open to the public. In addition, a public meeting was held to gather community input on the proposed UGB expansion study area.

The PAC was made up of the following representatives:

- Teri Lenahan, Mayor
- Stewart King, Planning Commission Chair
- Lonnie Knodel, Planning Commissioner
- Doug Nunnenkamp, Planning Commissioner/Parks Board Chair
- Eric Lawson, Economic Development Committee
- Charlie Hopewell, Jewett Cameron COO

- Laura Kelly, DLCD
- Kevin Young, DLCD
- Glen Bolen, ODOT Region 1
- Kate Hawkins, ODOT Region 1
- Jessica Pelz, Washington County
- Shannon Wilson, Washington County Housing

## 2. Establish Land Need

This chapter details the steps taken to establish North Plains' land need:

- Analyze Population Growth Forecast (from Portland State University (PSU))
- Identify Housing Land Need (from acknowledged HNA)
- Identify Other Land Need e.g., parks, public facilities (from acknowledged plans)
- Identify Employment Land Need (from acknowledged EOA)
- Identify Site Characteristics of Land Needed
- Examine Sites within Existing UGB

### Population Growth Forecast

The land needed to accommodate the projected growth of residential and employment uses in the 20-year planning horizon is based on the official population forecast, housing type mix and employment land needs identified in the City's adopted 2022 HNA and 2022 EOA. These two studies used the population forecast prepared by the Portland State University (PSU) Population Research Center in 2020.

In June 2020, PSU released a new population forecast for North Plains, forecasting a population of 7,076 in 2040. This is an increase of 3,666 people at an average annual growth rate of 3.7%. The 2017 HNA was updated to reflect this forecast and will be adopted by the City of North Plains along with the UGB Expansion. The EOA was also updated to reflect the new forecast and was adopted by the City of North Plains on November 7, 2022, and ultimately acknowledged by DLCD.

### Land Need: Residential, Parks, and Public Facilities

The 2022 HNA update identifies a total need for 1,348 dwelling units over the 20-year planning horizon, 558 of which can be accommodated within the existing UGB. This leaves a deficit of 790 dwelling units that cannot be accommodated inside the current North Plains UGB (Table 1).

Table 1. North Plains 2020 HNA UGB Expansion Average Residential Density Scenarios

<b>Plan Designation</b>	<b>Dwelling Units Capacity of Buildable Land</b>	<b>Needed Dwelling Units (2020-2040)</b>	<b>Surplus or Deficit of Dwelling Units</b>
Low Density Residential (R7.5)	11	591	(580)
Medium Density Residential (R5)	19	84	(65)
High Density Residential (R2.5)	24	169	(145)
Neighborhood Commercial	504	504	0
<b>Total</b>	<b>558</b>	<b>1,348</b>	<b>(790)</b>

In order to determine how much land is needed to accommodate the 790 dwelling units, the City must determine an average density (or densities) of housing. The HNA prepared several average



density scenarios to help illustrate the approximate amount of land that would be needed exclusively for housing at lower, moderate, and higher average densities (Table 2).

Table 2. North Plains 2020 HNA UGB Expansion Average Residential Density Scenarios

<b>Average Density</b>	<b>Density</b>	<b>Land Need</b>
Lower density	6.7 units per acre	118 acres
Moderate density	8.4 units per acre	94 acres
Higher density	9.7 units per acre	82 acres

The 2019 Comprehensive Plan includes maximum residential densities for each of the city's three residential zoning designations (Table 3), as well as a standard for future residential development of 70% single family detached and 30% single-family attached and multifamily.

Table 3. North Plains 2019 Comprehensive Plan Residential Densities

<b>Comprehensive Plan Designation</b>	<b>Maximum Density</b>	<b>Corresponding Zoning District</b>
Medium/Low Density Residential	5.8 dwelling units per net acre	R-7.5
Medium/High Density Residential	8.7 dwelling units per net acre	R-5
High Density Residential	17.4 dwelling units per net acre	R-2.5

Determining the amount of land needed for housing requires application of an average density for each residential zone as well as inclusion of the required housing type mix (70% single-family detached/30% single-family attached and multifamily). In identifying an average density for each zone, the City took into account several factors. North Plains is likely to retain an auto-dominated transportation system as public transit is not currently available or planned for the City. It is also important to City policy makers and residents to maintain a rural, small town identity but to accommodate reasonable population growth that would support certain uses, such as a grocery store and a vibrant downtown core.

After consideration of the HNA residential density scenarios (Table 2), the Comprehensive Plan densities (Table 3) and the community's growth objectives, the PAC refined the proposed residential densities for inclusion in the UGB Expansion Area (Table 4).

Table 4 UGB Expansion Area Residential Densities

<b>Zoning Designation</b>	<b>Average Density</b>	<b>Acres</b>	<b>Dwelling Units</b>
R-7.5 (Low Density)	5.5 dwelling units per net acre	84.5	464
R-5 (Medium Density)	8.0 dwelling units per net acre	14.0	112
R-2.5 (High Density)	17.4 dwelling units per net acre	12.3	214
Total	7.1 dwelling units per net acre	110.8	790

In addition to the dwelling units themselves, the City must accommodate parks, trails, open space, schools, and public infrastructure. Land need was estimated for each of these uses as detailed below.

Parks, Trails and Open Space: The amount of land needed for parks, open spaces and trails is estimated at 40 acres. This is based on the current deficit and future need of park land in the City to meet the goal level of service (LOS) in the Parks and Open Space Master Plan of 6.25 acres of parks per 1,000 residents, plus open spaces and trails to connect all residents to a park.

The 2040 population estimate of 7,076 people translates to 44.23 acres of developed core parks. Adding 2.0 acres for trails and pathways brings the total need in year 2040 to approximately 46.23 acres. According to the Parks Plan, there are 6.24 acres of parks in the city<sup>1</sup>. Therefore, the amount of land needed for parks, trails and open space in the UGB expansion is 40 acres.

Schools: All public schools in North Plains are owned and operated by Hillsboro School District (HSD). HSD completed construction of a new elementary school in 2021 that, combined with the existing elementary school, will accommodate all K-6 students in North Plains in the 20-year planning horizon of the UGB expansion.

Middle school students in North Plains attend Evergreen Middle School and high school students attend Glencoe High School, both of which are in Hillsboro. Evergreen currently has just over 800 students and capacity for another 400 students. The District's current demographic study shows a Student Yield Factor of 0.053 middle school students per household in North Plains for the Glencoe High School feeder group. The addition of an estimated 790 housing units in the next 20 years within the UGB expansion area would yield approximately 42 new middle school students in North Plains in the next 20 years. While a middle school may eventually be built in North Plains, there is no

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<sup>1</sup> The Sunset Ridge and Brynhill Master Plan areas include privately-owned parks that are accessible to the public that are not included in the Parks Plan inventory as they were not fully constructed at the time of inventory and are not owned or maintained by the City.

plan to do so in the 20-year planning horizon of the UGB expansion. Similarly, there are no plans for high school construction in the city. Therefore, the needs analysis for public schools results in no land need for the UGB Expansion project.

**Public Infrastructure:** The amount of land needed for public infrastructure is estimated at 15% of the acreage needed for residential dwellings (for example, 100 acres of land for dwellings requires 15 acres for streets and infrastructure).

In determining the residential land need, including areas for parks, trails, open spaces, schools and infrastructure, the City has determined that a total of 168 acres of land are needed for residential uses in the UGB expansion (Table 5).

Table 5. Residential Land Need (Recommended to PAC in May 2021)

Land Use	Acres
Housing	110.8
Parks, Trails and Open Space	40.0
Schools	0
Infrastructure	16.6
Total Residential Land Need	167.4

### Land Need and Site Characteristics: Employment and Public Facilities

The 2022 EOA and associated land need estimates are based on the adopted City Council Vision for future economic growth and diversification as permitted and encouraged by OAR 660-024. The Vision includes Four Priorities for community and economic development with the UGB expansion study process:

**PRIORITY 1:** Reverse the worsening trend of bedroom community status for North Plains with a thriving jobs-housing balance by expanding and diversifying employment opportunity and industry profile and presence.

**PRIORITY 2:** Grow business investment in North Plains to encourage expansion and diversification of the City's property tax base to reverse the imbalance created by a growing bedroom community development trend.

**PRIORITY 3:** Ensure and sustainably fund community-supporting infrastructure, economy-supporting infrastructure, and expanded City services such as recreational offerings that enhance community health and diversify the City economy.

**PRIORITY 4:** Expand the local presence of important, everyday commercial services for the residents of North Plains which offers a shorter and safer distance rather than at extended and costly distance to other cities.

The 2022 EOA identified a deficit of 687.8 acres of employment land in the 20-year planning period (2020-2040). This includes 172.4 acres for commercial uses and 515.4 acres for industrial uses. These totals include an allowance for needed for right-of-way (infrastructure) estimated at 25% of the acreage needed for employment uses. Therefore, the total land area needed to accommodate employment lands and associated infrastructure is 687.8 acres (Table 6).

Table 6. Employment Land Need (Recommended by PAC in May 2021)

<b>Land Use</b>	<b>Acres</b>
Commercial	172.4
<i>Office</i>	91.5
<i>Institutional</i>	21.2
<i>Retail</i>	72.3
Industrial	515.4
<i>Flex/Business Park</i>	167.6
<i>General Industrial</i>	324.5
<i>Warehouse</i>	52.9
<b>Total Employment Land Need</b>	<b>687.8</b>

In addition to the amount of land needed, the 2020 EOA also identified target services and industries for future economic growth consistent with City Council's Vision directive that export-oriented employers need to be pursued and recruited to broaden and strengthen its economy and employment opportunities. These services and industries include:

- A full-service grocery store
- Export-oriented employers
  - Computer & Electronic (C&E) Mfg.54 (5-100+ acres typical site range)
  - Multi-tenant Office Complex55 (5-20 acres typical site range)
  - Business Incubator (5-25+ acres typical site range)
  - Food Processing (5-25+ acres typical site range)
  - Small-scale manufacturing (electronics mfg., machinery mfg. (i.e., agriculture or industrial machinery), metals fabricating, specialty food & beverage manufacturing, renewable and alternative energy products) (10-50 acres typical site range)
  - Small-scale warehouse, distribution & wholesale (5-50 acres typical site range)
  - Professional services
  - Personal services (residents, senior and visitors)

The EOA goes on to identify specific site characteristics needed to accommodate these services and industries. Table 7 shows the number and size of sites needed to accommodate various users.

Table 7. Specific Land Demand by Plan Designation and Size

Number of Sites by Use Type	Typical Acreage	Sites Needed
<b>Industrial</b>		
Tech-based Anchor or Large Industrial	100 or more	2
Large Park/Cluster	50-100	1
Medium and Smaller Park	20-50	1
Expanding Users	5 – 20	8
Independent Small Businesses	5 or less	7
Totals	515.4 Acres	<b>19</b>
<b>Commercial – Office &amp; Retail</b>		
Large Business Park or Retail Center	20 – 40	1
Medium Business Park or Retail Complex	5 – 20	5
Small Office and Retail, Lodging Site	5 or less	9
Totals	172.4 acres	<b>15</b>

Source: PNW Economics, LLC

Note: Typical Acreage includes 25% addition for infrastructure

Table 8 shows the total 20-year residential and employment land need of 855.2 acres.

Table 8. North Plains UGB Expansion Area Land Need

Land Use	Land Need
Residential (Including housing, parks, trails, open space and right-of-way)	167.4 acres
Employment (Including commercial and industrial properties and right-of-way)	687.8 acres
Total UGB Expansion Area Land Need	855.2 acres

### Examine Sites within Existing UGB

Prior to pursuing a UGB expansion, the City must demonstrate that the land needs cannot reasonably be accommodated on land already inside the UGB. The City is required to evaluate opportunities to provide efficient development of residential land within the existing UGB.

The supply of vacant land inside the UGB is limited. As illustrated on the Building Lands Inventory Map (Figure 1), there are no opportunities for medium- or large-scale residential development, aside from the Brynhill Master Plan/North Expansion Area that has received land use approval to develop at 8.4 dwelling units per acre and is under construction.

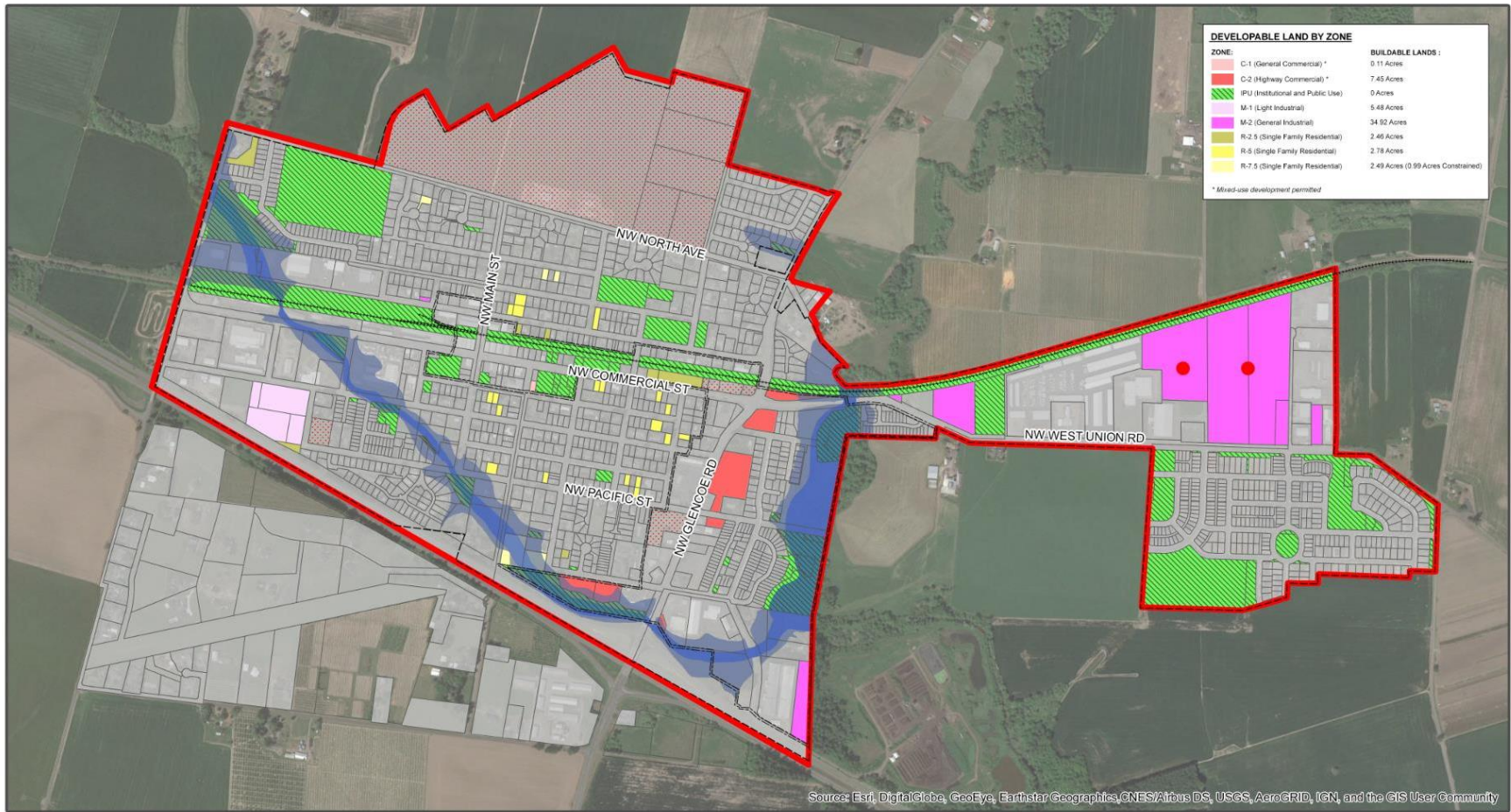
Due to the small supply of vacant land in North Plains, it is unlikely that land use efficiency measures will significantly reduce the current land need. However, these measures will apply to UGB expansion areas and therefore promote more efficient use of land in the future.

The City was instructed by DLCD to reference a table of “Measures to Accommodate Housing Needs within the UGB” found in OAR 660-038-0190(5). These measures can be sorted into four provision categories:

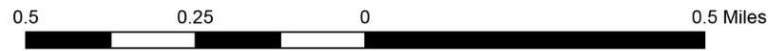
- Housing Type Provisions
- Density and Maximum Lot Size Provisions
- Street and Parking Provisions
- Financial Provisions

The City evaluated the land use efficiency measures and determined which would result in a meaningful change in the land development pattern in North Plains. Efficiency measures are presented separately by category in tables 9-12.

Figure 1. Buildable Lands Inventory



### North Plains Buildable Lands Inventory



N



Date: 6/23/2020



Table 9. Efficiency Measures- Housing Type Provisions

<b>Efficiency Measure</b>	<b>North Plains Response</b>
Prohibit detached single-family housing in the high density (R-2.5) zone.	Update Zoning Code to prohibit new detached single-family in the R-2.5 zone
Permit attached single-family housing outright in the medium density (R-5) zone.	Update Zoning Code to permit outright attached single-family housing in the R-5 zone
Permit duplexes outright on all lots where detached single-family housing is permitted with no additional development review standards.	Update Zoning Code to permit outright duplexes in the R-5 zone with no additional development standards (not in the low density, R-7.5 zone)
Adopt a cottage housing code provision authorizing at least 12 dwelling units per acre.	Update Zoning Code to include a cottage housing provision, allowing outright in the R-2.5 zone (17.4 dwelling units/acre max. density)
Limit the development of detached single-family housing in the medium density (R-5) zone to no more than 25% of the residences in a development application, unless the detached home is on a lot less than or equal to 3,000 square feet.	The proposed R-5 zone average density of 8.0 dwelling units/acre results in average lot sizes of 5,445 square feet. The density clearly supports primarily detached single-family housing. A limit on this type of housing in the R-5 zone would effectively prohibit development of housing in the R-5 zone.
Permit accessory dwelling units (ADUs) outright in all zones that permit detached single-family housing with no additional off-street parking requirement, in attached or detached configuration with primary residence, and without an owner occupancy requirement.	The Zoning Code currently permits ADUs outright in all R-zones with no additional off-street parking requirement, in attached or detached configuration with primary residence and without an owner occupancy requirement.
Permit residences in commercial districts (this standard only applies to cities with a population of 10,000).	The City population does not warrant compliance with this efficiency measure.

Table 10. Efficiency Measures- Density and Maximum Lot Size

<b>Efficiency Measure</b>	<b>North Plains Response</b>
Set a minimum density of at least 70 percent of maximum density for all residential zoning districts.	Update Zoning Code to set minimum density of at least 70% of maximum density in all R-zones.
Allow a density bonus for affordable housing (with specific provisions)	Update Zoning Code to allow a density bonus in the R-2.5 zone for affordable housing (with specific provisions).



Set a maximum lot size for detached single-family dwellings of 5,000 square feet.	The proposed R-7.5 zone average density of 5.5 dwelling units/acre results in average lot sizes of 7,920 square feet. The proposed R-5 zone average density of 8.8 dwelling units/acre results in average lot sizes of 5,445 square feet. If detached single-family dwellings are not permitted in the R-2.5 zone, there is no zone where a maximum lot size for detached single-family dwellings could be set at 5,000 square feet.
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Table 11. Efficiency Measures- Street and Parking Provisions

<b>Efficiency Measure</b>	<b>North Plains Response</b>
Reduce public street right-of-way width standard by at least two feet.	This would not impact the efficiency of land use within the existing UGB as the street network is built out.
Change parking requirements to maximum of no more than one space per multi-family dwelling unit. Allow on-street parking to count toward requirement.	This is not feasible in North Plains due to the lack of transit and services within the City limits.

Table 12. Efficiency Measures- Financial Provisions

<b>Efficiency Measure</b>	<b>North Plains Response</b>
Allow waiver or deferral of system development charges (SDCs) for certain housing types (such as ADUs, affordable or multifamily)	The City is in the process of reviewing all SDCs and will consider waivers and deferrals as part of that review process.
Exempt certain types of housing (such as affordable or multifamily) from paying property taxes.	The City has very low local property taxes. Property tax exemptions would not have a meaningful impact on efficient land development but would negatively impact the City.

Due to its population (under 10,000) and location (outside of Metro), North Plains is not required to meet the “middle housing” provisions of House Bill 2001 (accessory dwelling unit standards are required and met in the city’s development code). However, city decision makers realized that the efficient development of land within the existing UGB would require an expansion of permitted housing types and a reduction in the barriers to the construction of these housing types (such as a conditional use permit). In 2002, the city adopted development code amendments to:

- Prohibit new single-family detached housing in the R-2.5 zoning district.
- Allow outright duplexes, triplexes and townhouses in the R-5 zoning district.
- Add cottage cluster standards and permit this housing type outright in the R-2.5 zoning district.
- Set minimum density at 70% of maximum density in all residential zoning districts.
- Allow density bonus for affordable housing in the R-2.5 zoning district.

The city maintains an on-going review of System Development Charges (SDCs) and has included consideration for waivers and reductions for certain housing types.

### 3. Establish Study Area

This chapter details the steps taken to establish the North Plains UGB Expansion Study Area:

- Create Preliminary Study Area
- Evaluate Preliminary Study Area/ Exclusion of Lands
- Create Final Study Area

#### Create Preliminary Study Area

Establishing the land to be considered for expansion, known as the Preliminary Study Area, is dictated by OAR 660-024-0065. It states that the Preliminary Study Area must include all lands in a city's acknowledged urban reserves, and lands within a certain distance from the acknowledged UGB: one-half mile for jurisdictions of less than 10,000 and one mile for jurisdictions of more than 10,000, or land beyond the specified distances at the discretion of the jurisdiction. The city of North Plains has no urban reserves and is surrounded by rural reserves and "undesigned" areas shown in green in Figure 2. The City decided to consider land within one mile of the current UGB, excluding rural reserves, to address its 20-year land need. Since at least a portion of all parcels not designated as rural reserve are within one mile of the current UGB, the City decided to include all undesigned land in the Preliminary Study Area.

#### Evaluate Preliminary Study Area / Exclusion of Lands

Regulations allow for certain categories of land to be excluded from the preliminary study area, including land that, cannot accommodate a specific industrial or public facility need, is impracticable to serve, is subject to natural hazards, contains a specific scenic, natural, cultural or recreational resource, or is non-urban federal lands.

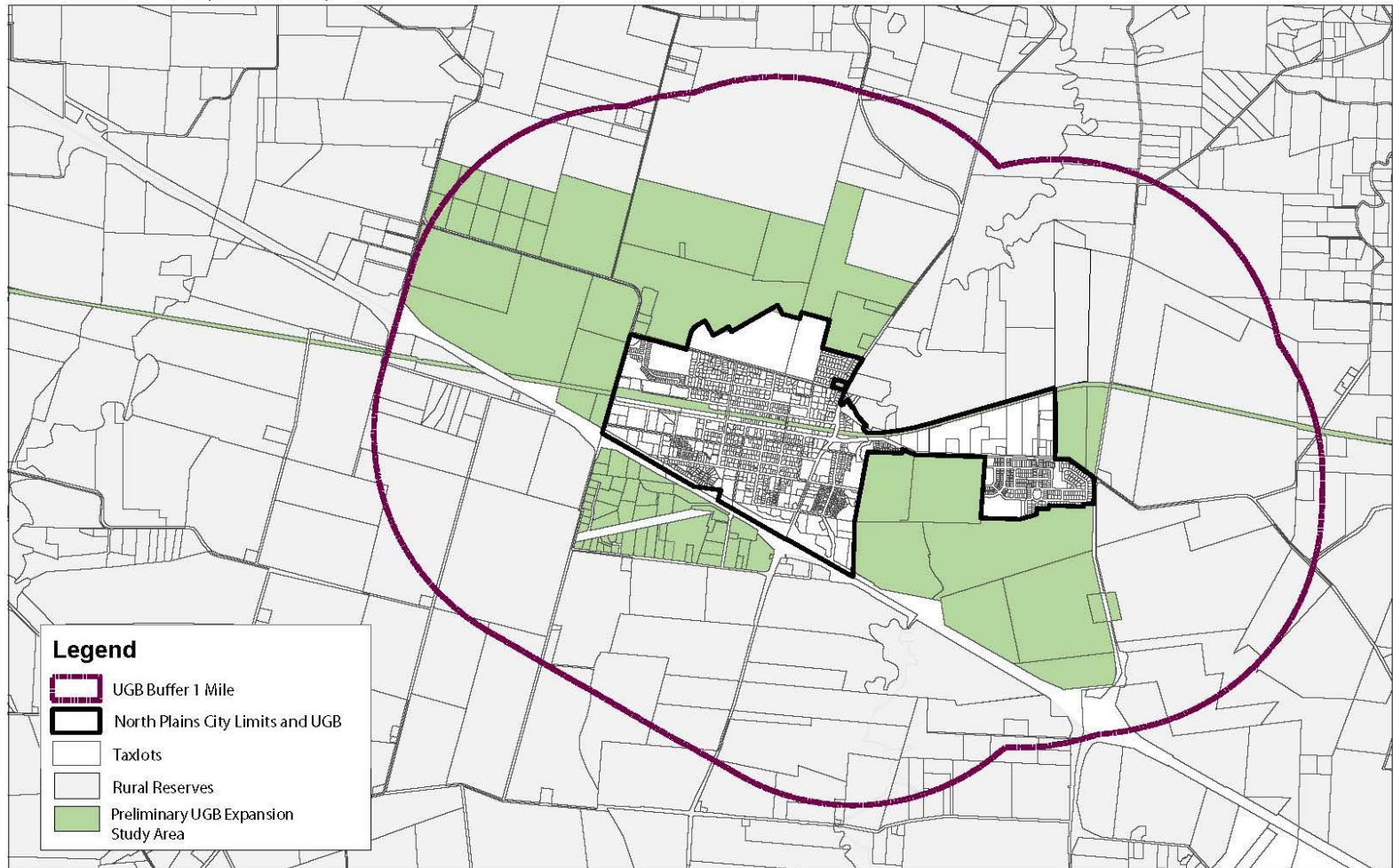
Specifically, the City of North Plains has determined that certain properties meet the exclusion criteria of Oregon Administrative Rule (OAR) 660-024-0065, state and county airport regulations, and the City's Comprehensive Plan and Transportation System Plan. The City's proposes to exclude a portion of the exception land south of Highway 26 and north of NW Beach Road.

The exclusion area consists primarily of the Sunset Air Strip and surrounding Air Acres and Sunset Orchard Estates residential subdivisions that are bound to the airport by restrictive covenants. The continuing operation of the Sunset Air Strip is a significant impediment to development at urban intensities. Development within the Air Strip and surrounding residential development is unlikely to occur during the planning period as the property owners intend to continue to operate the airport and additional development would impact its operations. Also, the cost of further developing the airport at urban intensities, and specifically developing the transportation network, would be prohibitively expensive, if not impossible in light of ORS 836.608.

Exclusion of these parcels of land is addressed, in detail, in Appendix A of this report.

Figure 2. North Plains UGB Expansion Preliminary Study Area

North Plains UGB Expansion Map



## **Create Final Study Area**

After excluding the Sunset Air Strip and surrounding Air Acres and Sunset Orchard Estates residential subdivisions, the Final Study Area is reflected in Figure 3.

Figure 3. North Plains UGB Expansion Final Study Area



## 4. Analyze Study Area

This chapter details the steps taken to analyze the North Plains UGB Expansion Study Area:

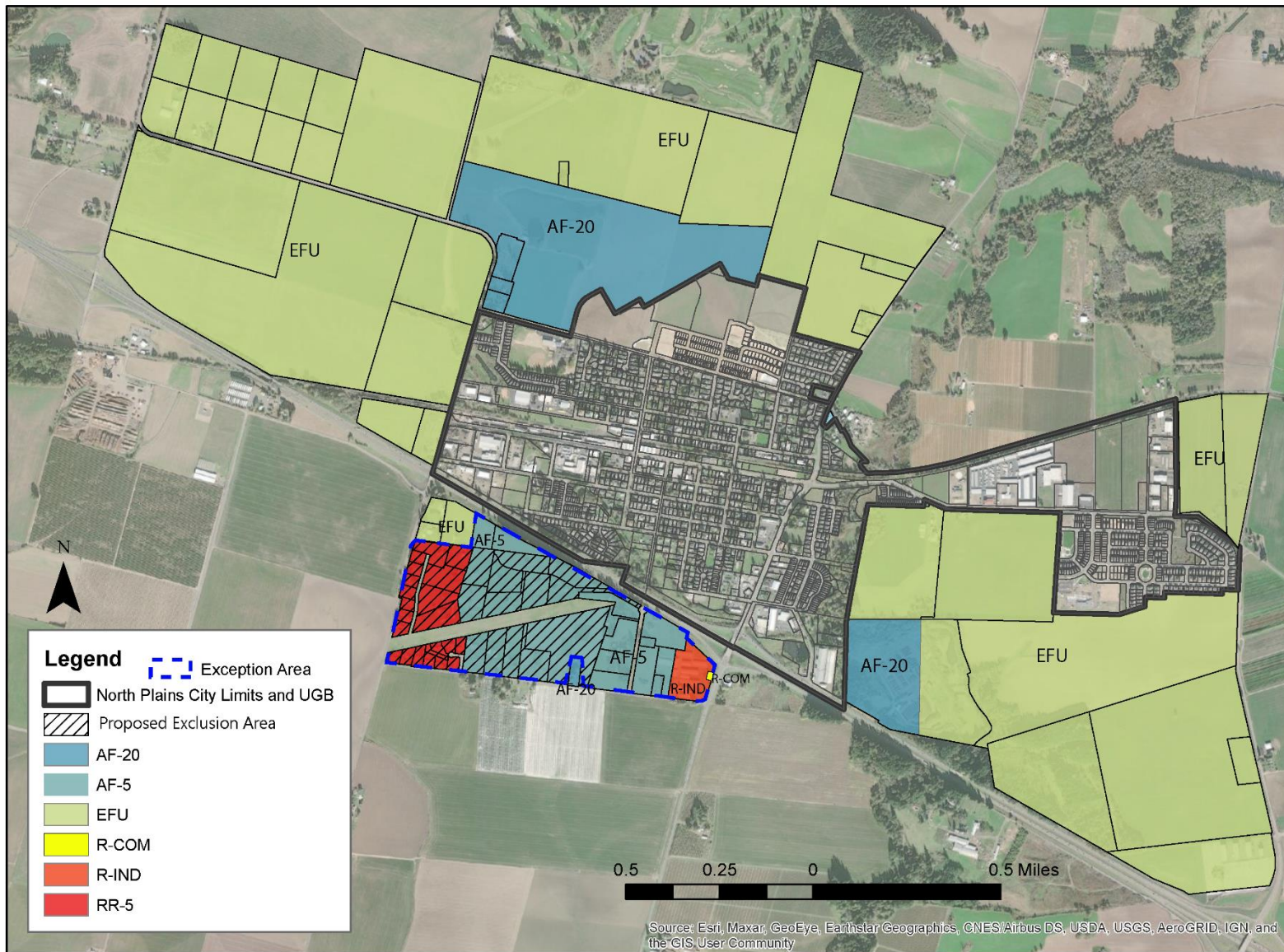
- Establish Parcel Prioritization Using Statutory Priorities (ORS 197A.320)
- Apply Suitability Criteria (OAR 660-024-0067(5))
- Apply Goal 14 Location Factor

### Establish Parcel Prioritization

Lands in the Study Area are evaluated against priorities set by OAR 660-024-0067. The First Priority includes urban reserves, exception land, and nonresource land. North Plains does not have any acknowledged urban reserves as it is surrounded by rural reserves and “undesigned” land. The Study Area does contain an area of exception land south of Highway 26, as shown in Figure 4. There are 140.85 acres of exception land in the study area; 125.61 acres when you remove the airstrip exclusion area (15.24 acres). The exception land has County zoning designations of Rural Residential-5 Acres (RR-5), rural Commercial (R-COM), Rural Industrial (R-IND), and Agricultural and Forest District-5 (AF-5).

The Second Priority is marginal lands, of which North Plains has none. The Third Priority is forest or farmland tracts, defined as contiguous parcels under common ownership, that are not predominantly high value. The process for determining the value of farmland was established in response to the passing of Measure 49, passed by Oregon voters in 2007. Measure 49 provides land owners a pathway to claim compensation if land uses restrict their farm practice and reduce the fair market value of their property. The Study Area, minus the exception land, was evaluated for the Third Priority by analyzing Washington County zoning, Washington County assessor records, United States Department of Agriculture (USDA) CropScape data, Oregon’s Department of Geology and Mineral Industries (DOGAMI) LiDAR topographic data, 2007 National Resources Conservation Service (NRCS) soil data, and Oregon Water Resources data in ArcGIS.

Figure 4. North Plains UGB Expansion Study Area with Zone Designations





As dictated by ORS 195.300 and 215.710, defining high-value farmland relies on a series of soil, crop, water, and topographic analyses. Land is determined high-value farmland if predominantly composed of soils classified as Class I or Class II by NRCS. Class I and Class II soils are high-value soils because they are resilient to damage, easy to manage, and have few limitations for field crops. The Study Area is predominantly, meaning at least fifty percent coverage, composed of Class I or Class II (high-value) soils.

The Study Area is further tested against the remaining sections of ORS 195.300 and 215.710. Land located in EFU zones within irrigation districts or water use permit holdings, the prevalence of wine grape crops, and land containing named high-value soils or specific elevations, slopes, and aspects within the Willamette Valley viticultural area are determined high-value farmland. While these factors are considered in the determination of farmland value, the predominance of Class I or Class II soils is enough standing to consider the Study Area high-value farmland. The Study Area does not contain predominantly low-value farmland based on a series of evaluative steps as listed above. Figure 5 illustrates areas of predominantly high-value and low-value farmland.

The Fourth Priority is areas of predominantly high-value farmland that do not contain prime or unique soils. All land in the Study Area, minus the exception land area to the south, is considered predominantly high-value farmland. The consideration of areas predominantly made up of prime or unique farm soils is only allowed if there is an insufficient amount of land in the previous priority categories to meet the identified land need. As shown in Figure 6, an analysis of prime or unique farmland shows the majority of the Study Area, almost mirroring the high-value farmland area, consists of prime soils as defined by the USDA NRCS.

### **Apply Suitability Criteria**

Applying the suitability criteria analysis to the areas of high-value farmland and prime soils, the “undesigned” lands, contain several areas of natural resources and two cemeteries, as shown in Figure 7. These areas will be included in the analysis, but will not contribute to the acreage needed to meet future housing and employment needs. The acreages of areas listed as wetlands or floodplains will not be removed as those areas may be viable for parks or public facilities. There is a total of 1,307.02 acres of undesigned land (non-exception land) in the study area, and 1,302.59 acres after removing the two cemeteries (4.43 acres). All of the undesigned lands consist of predominantly high-value farmland and prime soils and are eligible to help meet the land need that remains after the exception lands are considered.

Figure 5. Low Value and High Value Farmland, North Plains UGB Study Area

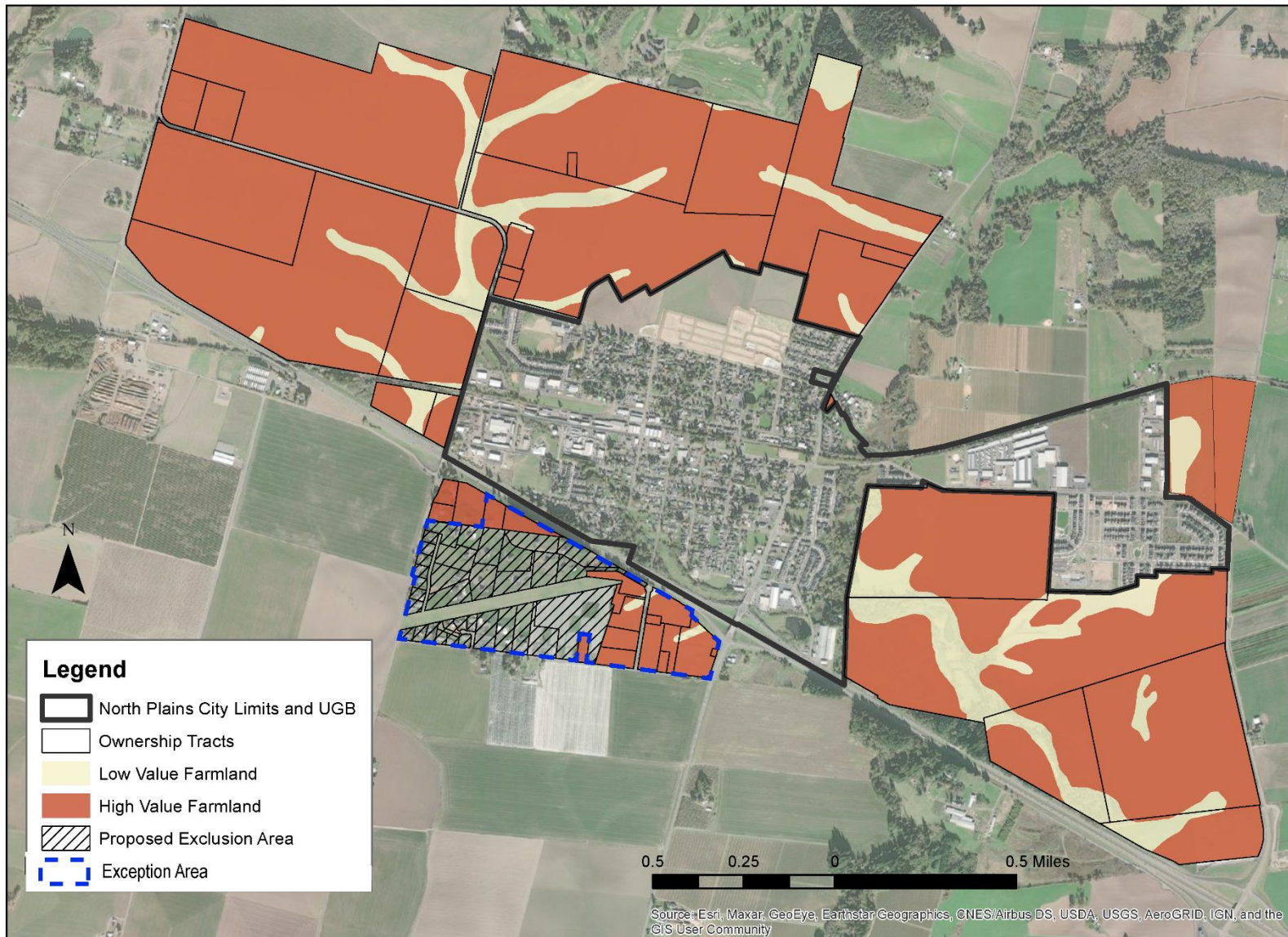


Figure 6. Prime Soils, North Plains UGB Study Area

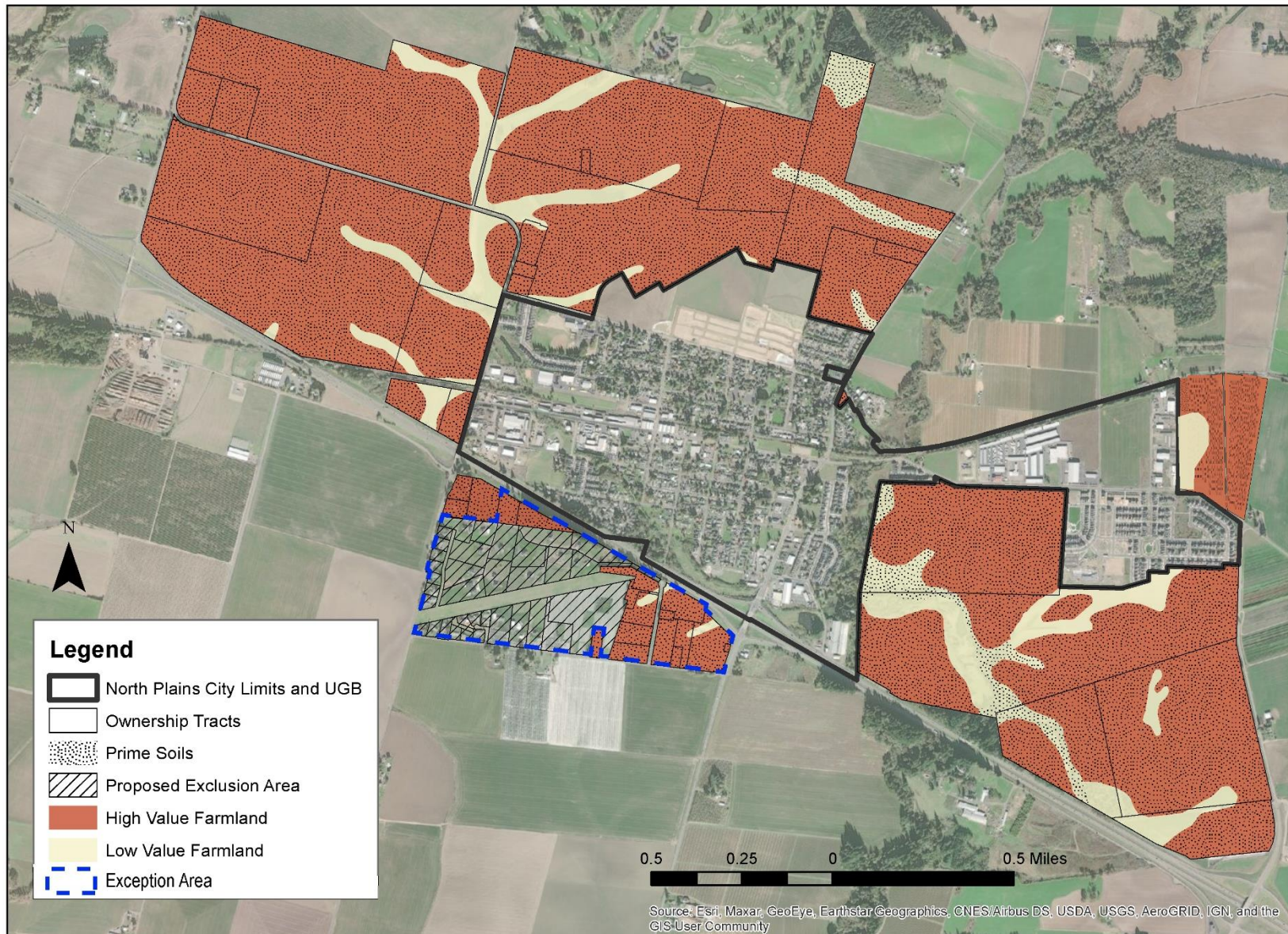
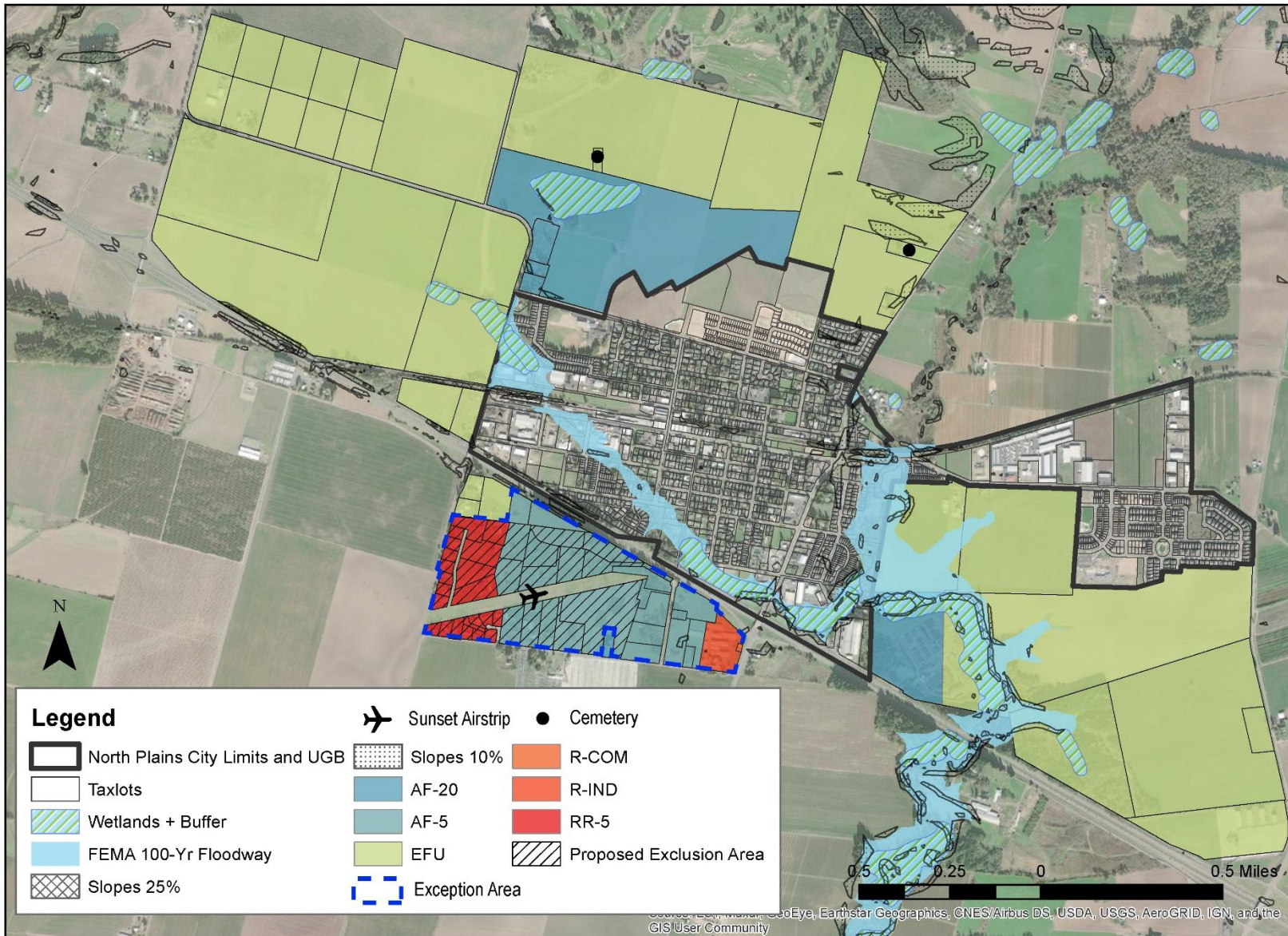


Figure 7. North Plains UGB Expansion Study Area "Suitability"



## Apply Goal 14 Location Factors

To expand the UGB, North Plains must complete a boundary location analysis, comparing alternative locations and considering which addition to the UGB will result in the most accommodating and cost-effective boundary, while creating the fewest conflicts with neighboring land uses, and causing the fewest negative environmental, economic, social and energy consequences.

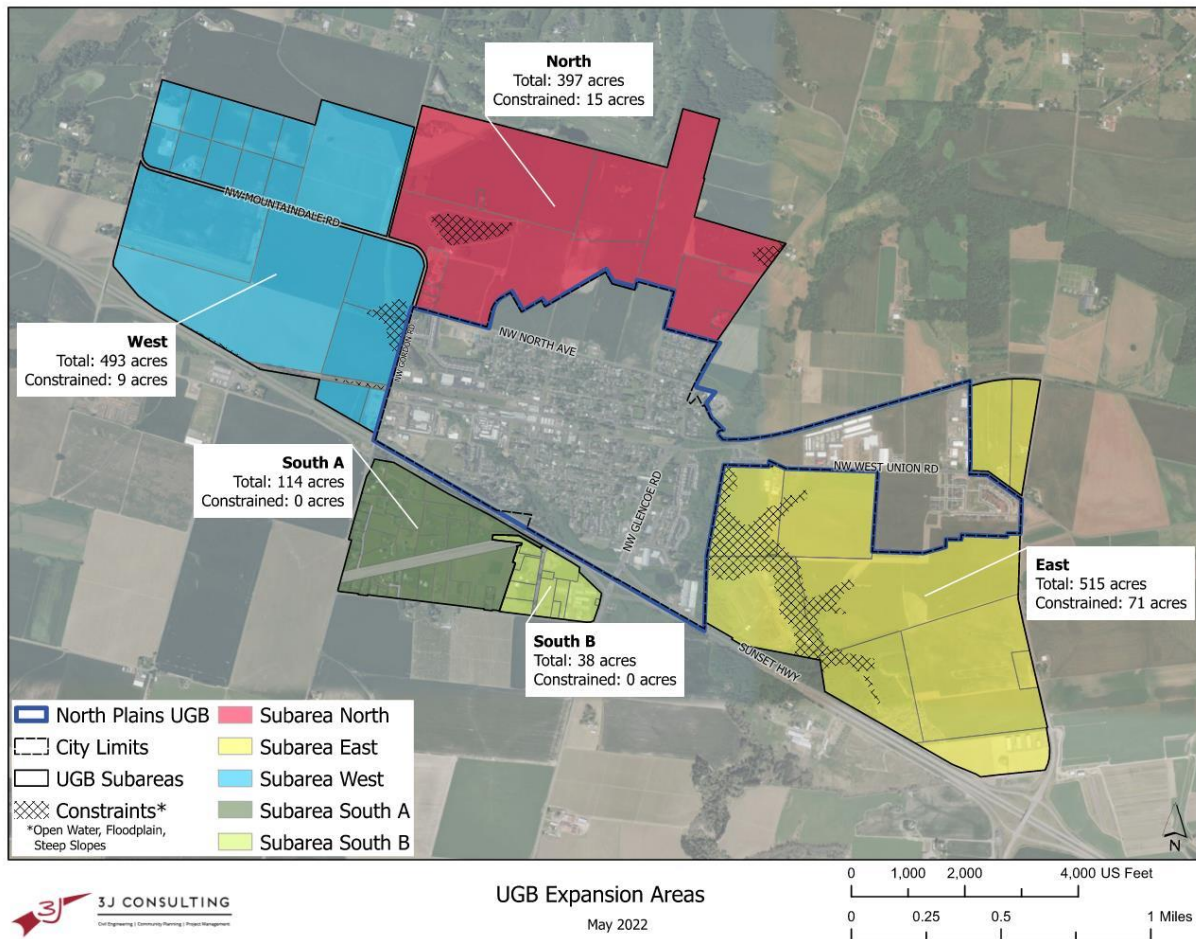
The boundary location analysis process is governed by Goal 14 and ORS 197A.320 and with consideration of the following factors:

1. Efficient accommodation of identified land needs
2. Orderly and economic provision of public facilities and services
3. Comparative environmental, energy, economic and social consequences
4. Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB

The four factors are weighted equally to create a balanced analysis and are considered concurrently rather than sequentially. The analyses that follow do not provide any definitive conclusion as to where the North Plains UGB should be expanded. Rather, they provide the data City leaders need to make an informed decision about how the City should grow over the next 20 years.

In order to apply the Goal 14 Location Factors, the City created subareas within the overall Study Area for evaluation purposes. Taking a cue from the last North Plains UGB expansion process in 2005, the 1,543-acre study area is divided into five subareas, North, South A, South B, West and West, as shown in Figure 8 and Table 13. Subareas were determined based on factors such as environmental features, taxlot lines, and transportation corridors. The southern area is divided into two subareas to make it easier to discuss the parcels the City proposes to exclude from the UGB expansion process (South Subarea A) from those the City intends to include in the expansion (South Subarea B).

Figure 8. North Plains UGB Study Area, Subareas



The **North Subarea** is located just north of the Brynhill Development and south of Pumpkin Ridge Golf Club. The Subarea consists of 11 parcels and has a gross area of 397 acres, including 15 acres with environmental constraints. The Subarea includes four parcels zoned AF-20 and seven parcels zoned EFU. Land use is primarily agriculture. The Subarea contains some wetland constraints. Two small parcels contain cemeteries, which are included in the study area, but will not be considered land that can accommodate North Plains’ residential or employment needs.

The **South Subarea A** contains 152 acres on 53 parcels south of Highway 26. The Subarea includes the 141 acres of exception land and no environmental constraints. The South Subarea is divided into two sections.

- South Subarea A is 114 acres on 41 parcels in the western section of the subarea. The area consists of predominantly rural residential uses and includes the Sunset Airstrip. The exception land includes 22 parcels zoned RR-5, 13 parcels zoned AF-5, 1 parcel zones AF-20, and 3 parcels zoned EFU.
- South Subarea B is 38 acres on 12 parcels located on the eastern side of the subarea

consisting of residential and industrial uses. Ten parcels are zoned AF-5, 1 parcel is zoned R-COM, and 1 parcel is zoned R-IND.

The **West Subarea** consists of 493 acres on 16 parcels, with about 9 acres with environmental constraints. All parcels are zoned EFU and land use is primarily agriculture.

The **East Subarea** includes 515 acres on 10 parcels located near the Sunset Ridge Development and bordered by Highway 26 to the south, Jackson School Road to the west, and North Plains city limits to the west and north. Current uses are primarily agricultural, though most of the westernmost portion is occupied by the Recology Organics processing facility. There is also approximately 71 acres of wetlands and areas within the 100-year floodway on the western portion of the site. One parcel is zoned AF-20 and eight are zoned EFU, and one parcel is split between AF-20 and EFU zones.

Table 13. North Plains UGB Expansion Study Area Zoning and Acres by Subarea and Section

<b>Subarea</b>	<b>Zoning</b>	<b>Parcels</b>	<b>Gross Acres</b>	<b>Acres w/o Env Const</b>	<b>Exception Land Acres</b>
North	AF-20	4	132.42	120.80	0.00
	EFU	7	264.75	261.64	0.00
South A	AF-5	15	72.83	72.83	72.83
	AF-20	1	1.40	1.40	0.00
	EFU	3	9.80	9.80	0.00
	RR-5	22	30.07	30.07	30.07
South B	AF-5	10	29.17	29.17	29.17
	R-COM	1	0.20	0.20	0.20
	R-IND	1	8.75	8.75	8.75
West	EFU	16	493.10	483.67	0.00
East	AF-20	1	42.36	18.18	0.00
	AF-20	1	34.82	26.63	0.00
	EFU		28.82	10.71	0.00
	EFU	8	409.12	388.48	0.00
<b>TOTAL</b>		<b>90</b>	<b>1,557.61</b>	<b>1,462.33</b>	<b>38.02</b>

When evaluating the priority of land for inclusion the city must first evaluate the approximately 140 acres of exception land south of Highway 26 and north of NW Beach Road and select as much of the land as necessary to satisfy the 855-acre land need. Since the acreage of the exception land is less than the established land need, the city will also evaluate the remaining 1,391 gross acres (1,294

acres without environmental constraints) within the study area, all of which is considered predominantly high-value farmland.

### **1. EFFICIENT ACCOMMODATION OF IDENTIFIED LAND NEEDS**

The City is using several criteria to determine where the City could most efficiently meet its land needs for the next 20 years – proximity, parcel size, and buildable land. Proximity to schools, employment, commercial areas, and amenities relieves pressure on the transportation system and provides more access to daily needs to higher concentrations of residents, resulting in a decrease in vehicle miles traveled (VMT). Parcelization is an indicator of both availability for development and the ability to develop an area in an efficient, coordinated manner. Looking at the gross acres available in an area may be misleading if there are environmental or other constraints on the land. Buildable land indicates how much of the land is available to be developed.

#### **Proximity**

The proximity criterion is based on the idea that land adjacent to the existing UGB offers the City multiple benefits:

- Leverages prior infrastructure investments
- Provides access to current services and amenities
- Supports downtown businesses
- Reduces VMT and supports active modes of transportation (walking and biking)
- Increases housing choice and promotes affordability
- Preserves valuable agriculture and forest land

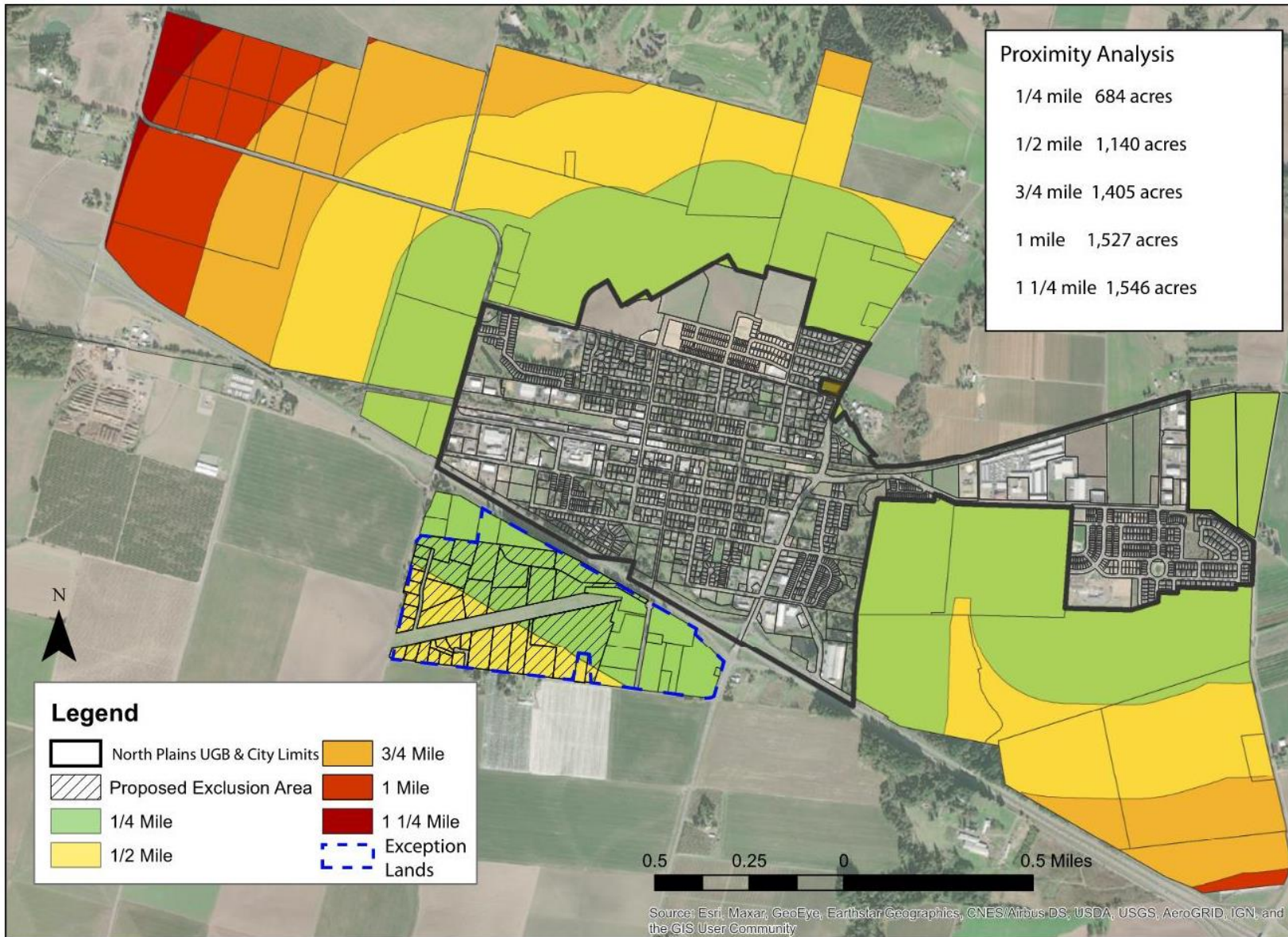
“Leapfrog” development bypasses available land located closer to the city, requiring new infrastructure investments, car-dependency, and greater land consumption.

Figure 9 illustrates the distance parcels within the study area are from the existing UGB. In general, parcels within ¼ mile (green) can meet the city’s needs more efficiently than those within ¼ and ½ mile (yellow), which are in turn better suited than parcels between ½ and ¾ miles away. There are about 618 gross acres of land within ¼ mile of the existing UGB, but that does not necessarily mean that all of this land should be brought into the UGB. The proximity criterion does not take land characteristics and other considerations into account. For example, the East Subarea includes significant environmental constraints and is the location of the Recology Organics processing facility.

The entire South Subarea, including all of the Exception Land, is within ½ mile of the UGB. It is important to note that the South Subarea is separated from the rest of the city by Highway 26, which makes it less suitable for residential development, as the highway is a barrier to walking and biking as well as access to shopping and services in the city.



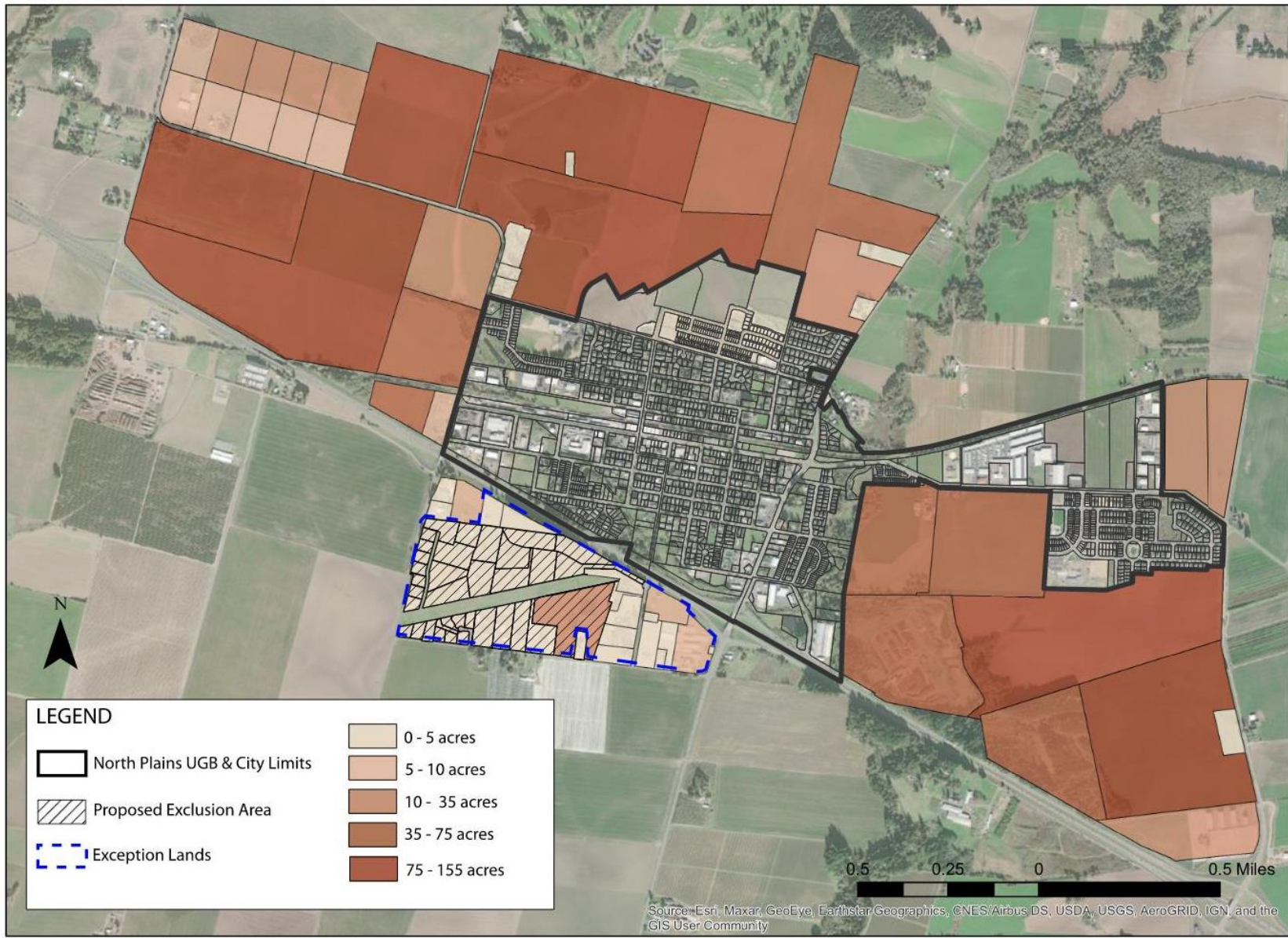
Figure 9. Proximity of Study Area Parcels to the Existing Urban Growth Boundary



**Parcel Size**

The next criterion is parcel size or parcelization. Larger parcels facilitate new development more efficiently than smaller parcels which often times need to be consolidated. The development of larger tracts of land tends to have a higher return on investment than the development/redevelopment of smaller tracts of land. However, a diversity of sizes is also advantageous to meeting residential and neighborhood-scale commercial needs. Figure 10 shows the range of parcel sizes and can be viewed together with the North Plains' Economic Opportunity Analysis, which details the parcel sizes needed for various employment uses, or the Housing Needs Analysis to determine residential suitability. Table 7 from Chapter 2 shows specific site characteristics needed to accommodate target services and industries, as identified in the 2022 EOA.

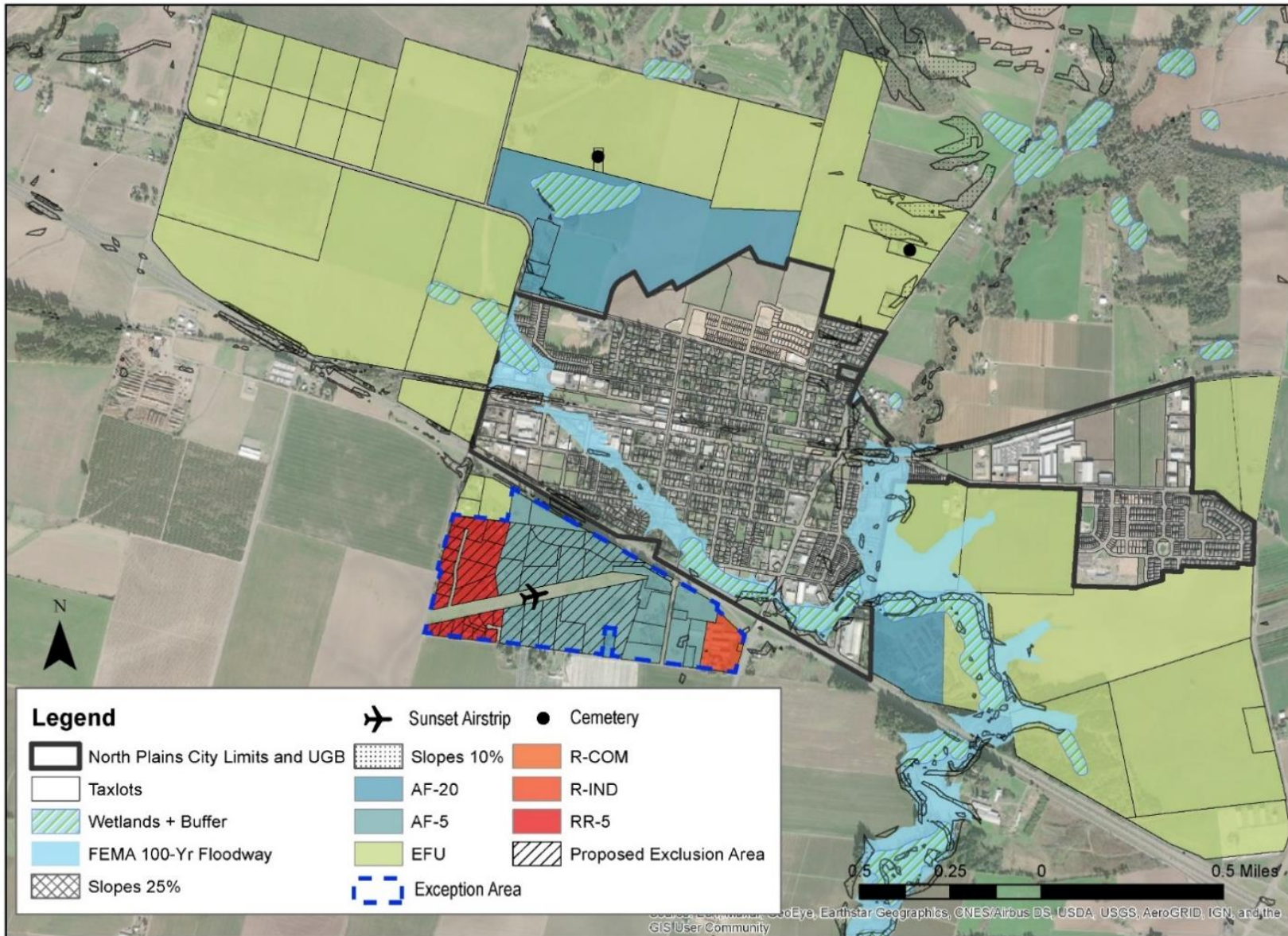
Figure 10. Study Area Parcel Sizes



**Buildable Land**

Buildable land is the land that remains for development after existing structures and environmental constraints are removed. Though a vast majority of the study area is currently used for agriculture and is free from existing structures, there are some subareas and specific parcels with residential or commercial buildings and uses that reduce the amount of buildable land available or may hinder or prevent future development. Figure 11 shows environmental constraints in the study area.

Figure 11. Study Area Environmental Constraints



Tables 14-18 provide an analysis of the Subareas relative to Goal 14, Factor 1, the efficient accommodation of identified land needs. Subareas are scored on a scale of 0 to 2 based on the three criteria: proximity, parcel size, and buildable land.

Table 14: Factor 1 North Subarea Summary and Evaluation

NORTH SUBAREA		Evaluation Criteria		Evaluation Results													
Description and Illustration		Evaluation Criteria	Ideal Definition	Score	Comments												
<p>The North Subarea is bounded by Pumpkin Ridge Golf Club (north), Pumpkin Ridge Road and Mountaindale Road (west), North Avenue and recently incorporated, undeveloped land (south), and Shadybrook Road (east).</p> <p><b>North</b> Total: 397 acres Constrained: 15 acres</p> <p><b>West</b> Total: 493 acres Constrained: 9 acres</p> <p><b>South A</b> Total: 114 acres Constrained: 0 acres</p> <p><b>South B</b> Total: 38 acres Constrained: 0 acres</p> <p><b>East</b> Total: 515 acres Constrained: 71 acres</p> <p><b>Legend:</b>          North Plains UGB (Blue outline)          City Limits (Dashed line)          UGB Subareas (White outline)          Constraints* (Cross-hatch pattern)          *Open Water, Floodplain, Steep Slopes          Subarea North (Red)          Subarea East (Yellow)          Subarea West (Blue)          Subarea South A (Green)          Subarea South B (Light Green)       </p> <p>3J CONSULTING        UGB Expansion Areas        May 2022</p> <p>Scale: 0 1,000 2,000 4,000 US Feet        0 0.25 0.5 1 Miles</p>		<b>Proximity</b>	Area is directly adjacent to the current UGB without major barriers and all land is within ¼ mile of the UGB.	<b>+1</b>	The North Subarea is adjacent to the current UGB. Most of the land is within ½ mile of the UGB. Land uses south of the North Subarea are primarily residential.												
		<b>Parcel Size</b>	Larger tracts of land are more conducive to development and meeting the city's specific commercial and industrial land needs.	<b>+2</b>	<p>The North Subarea consists of 13 parcels totaling 397 acres. Larger parcels in the North Subarea make it more conducive to development.</p> <table border="1"> <thead> <tr> <th>Parcel Size</th> <th>Parcels</th> </tr> </thead> <tbody> <tr> <td>50 or more</td> <td>3</td> </tr> <tr> <td>25 – 50</td> <td>2</td> </tr> <tr> <td>10 – 25</td> <td>0</td> </tr> <tr> <td>5 – 10</td> <td></td> </tr> <tr> <td>Less than 5</td> <td>8</td> </tr> </tbody> </table>	Parcel Size	Parcels	50 or more	3	25 – 50	2	10 – 25	0	5 – 10		Less than 5	8
Parcel Size	Parcels																
50 or more	3																
25 – 50	2																
10 – 25	0																
5 – 10																	
Less than 5	8																
		<b>Buildable Land</b>	Land free from environmental constraints and existing structures is better suited to facilitate future development.	<b>+2</b>	The subarea is primarily farmland and mostly free from environmental constraints, with the exception of the Lind Reservoir. There are around 10 homes and associated structures located along the edges of the area.												
		<b>Summary</b>	The North Subarea is adjacent to the UGB and includes large, unconstrained parcels making it, and especially the southern portion of the subarea, well-suited for UGB expansion.														

Table 15: Factor 1 South Subarea A Summary and Evaluation

SOUTH SUBAREA A		Evaluation Criteria		Evaluation Results													
Description and Illustration		Evaluation Criteria	Ideal Definition	Score	Comments												
<p>South Subarea A is bounded by US 26 (north/northeast), NW Gordon Road (west), and NW 316th Place (east). South Subarea A is largely built out with large lot residential parcels. The subarea is divided by the Sunset Air Strip, a private airport managed and owned by the residential neighborhood located within South Subarea A.</p> <p><b>North</b> Total: 397 acres Constrained: 15 acres</p> <p><b>West</b> Total: 493 acres Constrained: 9 acres</p> <p><b>South A</b> Total: 114 acres Constrained: 0 acres</p> <p><b>South B</b> Total: 38 acres Constrained: 0 acres</p> <p><b>East</b> Total: 515 acres Constrained: 71 acres</p> <p><b>Legend:</b>  <span style="border: 1px solid blue; padding: 2px;"> </span> North Plains UGB  <span style="border: 1px dashed black; padding: 2px;"> </span> City Limits  <span style="border: 1px solid black; padding: 2px;"> </span> UGB Subareas  <span style="border: 1px dashed black; padding: 2px;"> </span> Constraints*  <small>*Open Water, Floodplain, Steep Slopes</small>  <span style="background-color: red; width: 10px; height: 10px; display: inline-block;"></span> Subarea North  <span style="background-color: yellow; width: 10px; height: 10px; display: inline-block;"></span> Subarea East  <span style="background-color: blue; width: 10px; height: 10px; display: inline-block;"></span> Subarea West  <span style="background-color: green; width: 10px; height: 10px; display: inline-block;"></span> Subarea South A  <span style="background-color: lightgreen; width: 10px; height: 10px; display: inline-block;"></span> Subarea South B                 </p> <p style="text-align: center;"><b>UGB Expansion Areas</b> May 2022</p>		<p><b>Proximity</b></p>	<p>Area is directly adjacent to the current UGB without major barriers and all land is within ¼ mile of the UGB.</p>	<p><b>0</b></p>	<p>South Subarea A is adjacent to and entirely within ½ mile of the current UGB, but separated from the city by Hwy 26, which makes it less suitable for residential development. It does have access to the transportation network via NW Beach Rd.</p>												
		<p><b>Parcel Size</b></p>	<p>Larger tracts of land are more conducive to development and meeting the city's specific commercial and industrial land needs.</p>	<p><b>0</b></p>	<p>South Subarea A consists of 41 parcels totaling 114 acres. All but two of the parcels are less than five acres. This parcelization makes it less conducive to development.</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th>Parcel Size</th> <th>Parcels</th> </tr> </thead> <tbody> <tr> <td>50 or more</td> <td>0</td> </tr> <tr> <td>25 – 50</td> <td>0</td> </tr> <tr> <td>10 – 25</td> <td>1</td> </tr> <tr> <td>5 – 10</td> <td>1</td> </tr> <tr> <td>Less than 5</td> <td>39</td> </tr> </tbody> </table>	Parcel Size	Parcels	50 or more	0	25 – 50	0	10 – 25	1	5 – 10	1	Less than 5	39
Parcel Size	Parcels																
50 or more	0																
25 – 50	0																
10 – 25	1																
5 – 10	1																
Less than 5	39																
		<p><b>Buildable Land</b></p>	<p>Land free from environmental constraints and existing structures is better suited to facilitate future development.</p>	<p><b>+1</b></p>	<p>Most of the site is covered with rural residences associated with the air strip, which is not conducive to additional development. The exception is the 18-acre parcel currently used for agricultural purposes.</p>												
		<p><b>Summary</b></p> <p>Given its isolated location, smaller parcel sizes, and development status, South Subarea A is not a good candidate for UGB expansion.</p>															



Table 16: Factor 1 South Subarea B Summary and Evaluation

SOUTH SUBAREA B		Evaluation Criteria		Evaluation Results													
Description and Illustration		Evaluation Criteria	Ideal Definition	Score	Comments												
<p>South Subarea B is bounded by US 26 (north), NW 316<sup>th</sup> Place (west), NW Beach Road (south), and NW Glencoe Road (east).</p> <p><b>North</b> Total: 397 acres Constrained: 15 acres</p> <p><b>West</b> Total: 493 acres Constrained: 9 acres</p> <p><b>South A</b> Total: 114 acres Constrained: 0 acres</p> <p><b>South B</b> Total: 38 acres Constrained: 0 acres</p> <p><b>East</b> Total: 515 acres Constrained: 71 acres</p> <p>Legend:  <span style="border: 1px solid blue; padding: 2px;"> </span> North Plains UGB  <span style="border: 1px dashed black; padding: 2px;"> </span> City Limits  <span style="border: 1px solid black; padding: 2px;"> </span> UGB Subareas  <span style="border: 1px dashed black; padding: 2px;"> </span> Constraints*  <small>*Open Water, Floodplain, Steep Slopes</small>  <span style="background-color: red; width: 10px; height: 10px; display: inline-block;"></span> Subarea North  <span style="background-color: blue; width: 10px; height: 10px; display: inline-block;"></span> Subarea West  <span style="background-color: green; width: 10px; height: 10px; display: inline-block;"></span> Subarea South A  <span style="background-color: yellow; width: 10px; height: 10px; display: inline-block;"></span> Subarea South B</p> <p>3J CONSULTING  <small>Soil Engineering   Community Planning   Project Management</small></p> <p>UGB Expansion Areas                      May 2022</p> <p>0 1,000 2,000 4,000 US Feet                      0 0.25 0.5 1 Miles</p>		<b>Proximity</b>	Area is directly adjacent to the current UGB without major barriers and all land is within ¼ mile of the UGB.	<b>+1</b>	South Subarea B is adjacent to and entirely within ¼ mile of the current UGB, but separated from the city by Hwy 26, which makes it less suitable for residential development. The subarea does have frontage on Glencoe Road, which has good visibility for commercial development.												
		<b>Parcel Size</b>	Larger tracts of land are more conducive to development and meeting the city's specific commercial and industrial land needs.	<b>+1</b>	<p>South Subarea B consists of 12 parcels totaling 38 acres. Only two parcels are between five and ten acres. This parcelization makes it less conducive to development.</p> <table border="1"> <thead> <tr> <th>Parcel Size</th> <th>Parcels</th> </tr> </thead> <tbody> <tr> <td>50 or more</td> <td>0</td> </tr> <tr> <td>25 – 50</td> <td>0</td> </tr> <tr> <td>10 – 25</td> <td>0</td> </tr> <tr> <td>5 – 10</td> <td>2</td> </tr> <tr> <td>Less than 5</td> <td>10</td> </tr> </tbody> </table>	Parcel Size	Parcels	50 or more	0	25 – 50	0	10 – 25	0	5 – 10	2	Less than 5	10
Parcel Size	Parcels																
50 or more	0																
25 – 50	0																
10 – 25	0																
5 – 10	2																
Less than 5	10																
		<b>Buildable Land</b>	Land free from environmental constraints and existing structures is better suited to facilitate future development.	<b>+1</b>	The subarea is mostly farmland with no environmental constraints and just a few rural residences. There are numerous agricultural/industrial structures proximate to Glencoe Road.												
		<b>Summary</b>	South Subarea B is separated from the city by Highway 26 and includes smaller parcel sizes, but does have frontage on Glencoe Road making it a candidate for UGB expansion for commercial development/redevelopment.														

Table 17: Factor 1 West Subarea Summary and Evaluation

WEST SUBAREA		Evaluation Criteria		Evaluation Results													
Description and Illustration		Evaluation Criteria	Ideal Definition	Score	Comments												
<p>The West Subarea is bounded by Dersham Road (west), US 26 (south), and NW Gordon Road (east). The northern boundary of West Subarea is not confined by a physical limitation.</p>		<b>Proximity</b>	Area is directly adjacent to the current UGB without major barriers and all land is within ¼ mile of the UGB.	<b>+1</b>	The West Subarea is adjacent to the UGB. More than 25% of the subarea is within ¼ mile of the UGB and 50% within ½ mile. Land uses to the east are primarily industrial.												
		<b>Parcel Size</b>	Larger tracts of land are more conducive to development and meeting the city's specific commercial and industrial land needs.	<b>+2</b>	<p>The West Subarea consists of 15 parcels totaling 493 acres. All parcels are more than five acres and three are more than 50 acres. Larger parcels in the North Subarea make it more conducive to development.</p> <table border="1"> <thead> <tr> <th>Parcel Size</th> <th>Parcels</th> </tr> </thead> <tbody> <tr> <td>50 or more</td> <td>3</td> </tr> <tr> <td>25 – 50</td> <td>2</td> </tr> <tr> <td>10 – 25</td> <td>4</td> </tr> <tr> <td>5 – 10</td> <td>6</td> </tr> <tr> <td>5 or less</td> <td>0</td> </tr> </tbody> </table>	Parcel Size	Parcels	50 or more	3	25 – 50	2	10 – 25	4	5 – 10	6	5 or less	0
Parcel Size	Parcels																
50 or more	3																
25 – 50	2																
10 – 25	4																
5 – 10	6																
5 or less	0																
		<b>Buildable Land</b>	Land free from environmental constraints and existing structures is better suited to facilitate future development.	<b>+2</b>	The West Subarea is mostly farmland with a few wetlands near the eastern edge and few rural residences.												
<b>Summary</b>																	
Given its location relative to the existing UGB and large, mostly unconstrained parcels, the West Subarea is well-suited for UGB expansion.																	

Table 18: Factor 1 East Subarea Summary and Evaluation

EAST SUBAREA		Evaluation Criteria		Evaluation Results													
Description and Illustration		Evaluation Criteria	Ideal Definition	Score	Comments												
<p>The East Subarea is broken up into two portions. The larger portion is bounded by NW West Union Road (north), new residential development and Atfalati Ridge Elementary School (north), US 26 (south) and NW Jackson School Road (east). The smaller portion of the East Subarea is bounded by the railroad (north), industrial land uses adjacent to NW 298th Place (west), NW Jackson School Road (east) and NW West Union Road (south).</p>		<b>Proximity</b>	Area is directly adjacent to the current UGB without major barriers and all land is within ¼ mile of the UGB.	<b>+2</b>	The East Subarea is adjacent to the existing UGB and about half of the subarea is within ¼ mile of the UGB. Surrounding land uses are a mix of residential and industrial.												
		<b>Parcel Size</b>	Larger tracts of land are more conducive to development and meeting the city's specific commercial and industrial land needs.	<b>+2</b>	<p>The East Subarea consists of 10 parcels totaling 515 acres. Only one parcel is less than ten acres. Large parcels in the East Subarea make it more conducive to development.</p> <table border="1"> <thead> <tr> <th>Parcel Size</th> <th>Parcels</th> </tr> </thead> <tbody> <tr> <td>50 or more</td> <td>4</td> </tr> <tr> <td>25 – 50</td> <td>4</td> </tr> <tr> <td>10 – 25</td> <td>1</td> </tr> <tr> <td>5 – 10</td> <td>1</td> </tr> <tr> <td>Less than 5</td> <td>0</td> </tr> </tbody> </table>	Parcel Size	Parcels	50 or more	4	25 – 50	4	10 – 25	1	5 – 10	1	Less than 5	0
Parcel Size	Parcels																
50 or more	4																
25 – 50	4																
10 – 25	1																
5 – 10	1																
Less than 5	0																
		<b>Buildable Land</b>	Land free from environmental constraints and existing structures is better suited to facilitate future development.	<b>+2</b>	The East Subarea is mostly farmland with significant environmental constraints in the western portion along with the Recology Organics processing site. The remainder of the site is mostly free of constraints other than several rural residences and farm-related structures.												
		<b>Summary</b>															
		The East Subarea is a good candidate for UGB expansion given its location relative to the existing UGB and large, parcels even though the amount of buildable land is lower due to environmental constraints.															

**2a. ORDERLY AND ECONOMIC PROVISION OF PUBLIC FACILITIES AND SERVICES:  
TRANSPORTATION**

OAR Chapter 660 Division 12, Transportation Planning was reviewed to identify relevant goals and objectives, applicable for the development of the transportation evaluation criteria for the North Plans Urban Growth Boundary Expansion. The relevant objectives included as part of Chapter 660 are identified below:

- (a) Promote the development of transportation systems adequate to serve statewide, regional and local transportation needs and the mobility needs of the transportation disadvantaged
- (b) Encourage and support the availability of a variety of transportation choices for moving people that balance vehicular use with other transportation modes, including walking, bicycling and transit in order to avoid principal reliance upon any one mode of transportation;
- (c) Provide for safe and convenient vehicular, transit, pedestrian, and bicycle access and circulation;
- (d) Facilitate the safe, efficient and economic flow of freight and other goods and services within regions and throughout the state through a variety of modes including road, air, rail and marine transportation;
- (e) Protect existing and planned transportation facilities, corridors and sites for their identified functions;
- (f) Provide for the construction and implementation of transportation facilities, improvements and services necessary to support acknowledged comprehensive plans;
- ~~(g) Identify how transportation facilities are provided on rural lands consistent with the goals;~~
- ~~(h) Ensure coordination among affected local governments and transportation service providers and consistency between state, regional and local transportation plans; and~~
- (i) Ensure that changes to comprehensive plans are supported by adequate planned transportation facilities.

**Subarea Evaluation and Transportation Criteria**

The transportation evaluation criteria were developed to qualitatively assess the five (5) subareas considered for potential urban growth boundary (UGB) expansion. The criteria development was largely influenced by the relevant objective identified in Chapter 660 Division 12, Transportation Planning, and the Goals and Objectives identified in the North Plains Transportation System Plan (TSP – Reference 1). The transportation evaluation criteria are defined below:

- Local Mobility
- Regional Mobility
- Safe Access
- Environmental
- Feasibility
- Balanced System

**Evaluation Methodology**

Subareas were evaluated based on the set of six (6) criteria with a scoring scale of 0 - +2, as shown in Tables 19-23. The “Ideal Definition” summarizes the description in achieving the highest value (+2). Subareas that do not meet the ideal definition are scored zero (0), while subareas that partially meet the ideal definition are scored one (+1).

Explanatory narrative describing the justification and reasoning of the evaluation scoring for each subarea is provided under the “Comment” column. The evaluation criteria were applied to the subareas based on a subarea to subarea comparative approach.

Table 19: Factor 2 Transportation North Subarea Summary and Evaluation

NORTH SUBAREA		Transportation Evaluation Criteria		Evaluation Results	
Concept Description and Illustration		Evaluation Criteria	Ideal Definition	Score (0 - +2)	Comments
<p>The North Subarea is bounded by Pumpkin Ridge Golf Club (north), Pumpkin Ridge Road and Mountaindale Road (west), North Avenue and recently incorporated, undeveloped land (south), and Shadybrook Road (east).</p>		<b>Local Mobility</b>	Has close proximity to established roadway and active transportation infrastructure, allowing for numerous multi-modal connections that are intuitive and feasible.	<b>+2</b>	Local street extensions from the adjacent North Avenue development are feasible. There are opportunities to integrate collector street connections to NW North Avenue and NW Shadybrook Road.
		<b>Regional Mobility</b>	Has direct, convenient, and efficient access to regional travel infrastructure.	<b>0</b>	Regional connections are available via NW Mountaindale Road, NW Old Pumpkin Ridge Road, and NW Shadybrook Road. However, these connections to interchange areas are less direct and require travel through alternative subareas or existing UGB.
		<b>Safe Access</b>	Has safe and convenient access to schools, parks, shopping, and employment centers.	<b>+2</b>	Area is in close proximity to North Plains Elementary School, access across NW North Avenue to essential destinations (parks, library, downtown amenities).
		<b>Environmental</b>	Has no environmentally sensitive areas such as wetlands, streams, and exclusion areas.	<b>+1</b>	Area has minor environmental constraints associated with Lind Reservoir. Future development must consider the Lind Reservoir and establish appropriate buffers.
		<b>Feasibility</b>	Can support future development without fundamental changes to existing and planned infrastructure identified in adopted planning documents.	<b>+1</b>	Urban standard roadway upgrades would be needed along portions of NW Old Pumpkin Ridge Road and NW Mountaindale Road. NW North Avenue and NW Shadybrook Road will require more moderate upgrades.
		<b>Balanced System</b>	Can support a balanced transportation network and avoids reliance upon any one travel mode.	<b>+1</b>	Future development can be integrated into the adjacent multimodal system due to its proximity with the new North Avenue development.
		<b>Summary</b>			
		The North Subarea has the potential to naturally tie into the existing North Plains transportation infrastructure. However much of this infrastructure will require urban upgrades to support future development. Although large in area, significant portions of the North Subarea are in close proximity to the established portions of North Plains. As such, it has strong, safe, and convenient multimodal access to essential destinations. In comparison to other subareas, regional mobility is limited due to the lack of direct, convenient, and efficient access to regional travel infrastructure.			

Table 20: Factor 2 Transportation South Subarea A Summary and Evaluation

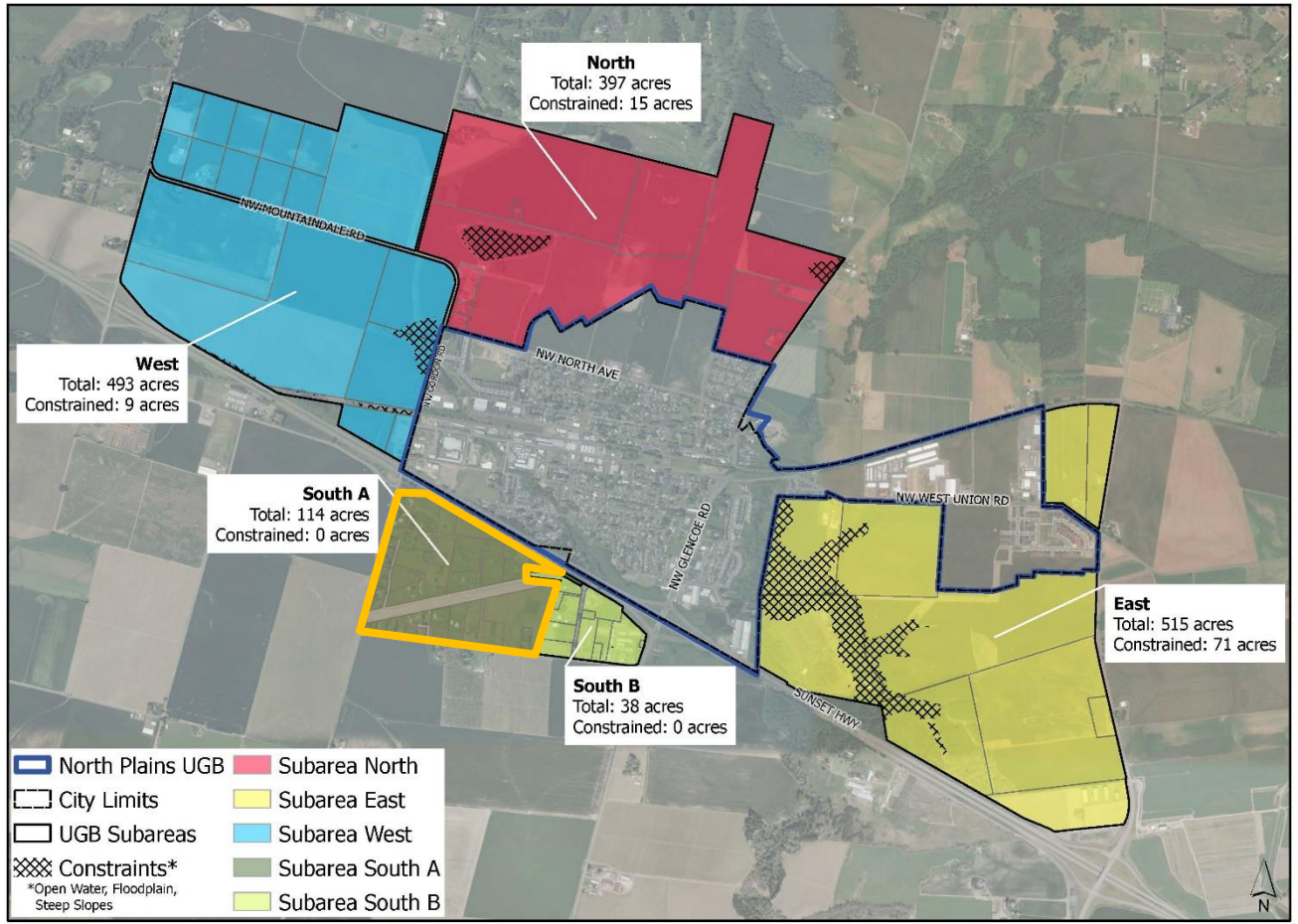
SOUTH SUBAREA A		Transportation Evaluation Criteria		Evaluation Results	
Concept Description and Illustration		Evaluation Criteria	Ideal Definition	Score (0 - +2)	Comments
<p>South Subarea A is bounded by US 26 (north/northeast), NW Gordon Road (west), and NW 316th Place (east). South Subarea A is largely built out with large lot residential parcels. The subarea is divided by the Sunset Air Strip, a private airport managed and owned by the residential neighborhood located within South Subarea A.</p>  <p><b>North</b> Total: 397 acres Constrained: 15 acres</p> <p><b>West</b> Total: 493 acres Constrained: 9 acres</p> <p><b>South A</b> Total: 114 acres Constrained: 0 acres</p> <p><b>South B</b> Total: 38 acres Constrained: 0 acres</p> <p><b>East</b> Total: 515 acres Constrained: 71 acres</p> <p>Legend:                  ■ North Plains UGB                  □ City Limits                  □ UGB Subareas                  ▨ Constraints*                  *Open Water, Floodplain, Steep Slopes</p> <p>■ Subarea North                  ■ Subarea East                  ■ Subarea West                  ■ Subarea South A                  ■ Subarea South B</p> <p>Scale: 0 1,000 2,000 4,000 US Feet                  0 0.25 0.5 1 Miles</p> <p>3J CONSULTING                  Civil Engineering   Community Planning   Project Management                  UGB Expansion Areas                  May 2022</p>		<b>Local Mobility</b>	Has close proximity to established roadway and active transportation infrastructure, allowing for numerous multi-modal connections that are intuitive and feasible.	<b>0</b>	Area is located south of US 26 which has minimal local street connectivity to the established North Plains grid network. A connection is available via NW Gordon Road, but the bridge across US 26 does not accommodate bicycle and pedestrian movements.
		<b>Regional Mobility</b>	Provides direct, convenient, and efficient access to regional travel infrastructure.	<b>+1</b>	Despite being located adjacent to US 26, regional mobility is not direct and is dependent upon unimproved Washington County roadways to either the US 26/Glencoe Road and US 26/NW Dersham Road interchanges.
		<b>Safe Access</b>	Has safe and convenient access to schools, parks, shopping, and employment centers	<b>0</b>	Area is isolated with residential parcels built out with large lots. Access to and from the area are vehicle centric with no walking, biking, or rolling facilities to/from the subarea.
		<b>Environmental</b>	Avoids environmental impacts, including those to wetlands, streams, and exclusion areas.	<b>+2</b>	No known environmental or sensitive areas have been identified.
		<b>Feasibility</b>	Avoids necessary changes to existing and planned infrastructure identified in adopted planning documents.	<b>0</b>	The US 26/NW Glencoe Road Interchange Area Management Plan assumed limits future development within the area bounded by US 26, NW Gordon Road, and NW Beach Road. Future urbanization assumptions would require an updated IAMP to reevaluate and assess interchange infrastructure and access management upgrades. Urban standard upgrades would be needed along NW Beach Road and NW Gordon Road. The development of local infrastructure to serve long-term redevelopment will be a challenge.
		<b>Balanced System</b>	Provides equal opportunity of transportation choices and avoids reliance upon any one mode	<b>0</b>	Development will attract vehicular centric activity in an area with no active transportation connectivity. NW Gordon Rd and NW Beach Rd will need to be upgraded to provide balanced modal options accessing the sub area.
<b>Summary</b>					
South Subarea A has good regional mobility characteristics, but they are not as strong as South Subarea B. The existing land uses, and residential parcels occupy the majority of South Subarea A with limited inter subarea connectivity available due to the air strip. US 26 serves as a barrier to South Subarea A and limits future connectivity to the urbanized segments of North Plains.					

Table 21: Factor 2 Transportation South Subarea B Summary and Evaluation

SOUTH SUBAREA B		Transportation Evaluation Criteria		Evaluation Results	
Concept Description and Illustration		Evaluation Criteria	Ideal Definition	Score (0 - +2)	Comments
<p>South Subarea B is bounded by US 26 (north), NW 316<sup>th</sup> Place (west), NW Beach Road (south), and NW Glencoe Road (east).</p> <p><b>North</b> Total: 397 acres Constrained: 15 acres</p> <p><b>West</b> Total: 493 acres Constrained: 9 acres</p> <p><b>South A</b> Total: 114 acres Constrained: 0 acres</p> <p><b>South B</b> Total: 38 acres Constrained: 0 acres</p> <p><b>East</b> Total: 515 acres Constrained: 71 acres</p> <p>Legend:  <span style="border: 1px solid blue; padding: 2px;"> </span> North Plains UGB  <span style="border: 1px dashed black; padding: 2px;"> </span> City Limits  <span style="border: 1px solid black; padding: 2px;"> </span> UGB Subareas  <span style="border: 1px dashed black; padding: 2px;"> </span> Constraints*  <small>*Open Water, Floodplain, Steep Slopes</small>  <span style="background-color: red; width: 10px; height: 10px; display: inline-block;"></span> Subarea North  <span style="background-color: yellow; width: 10px; height: 10px; display: inline-block;"></span> Subarea East  <span style="background-color: blue; width: 10px; height: 10px; display: inline-block;"></span> Subarea West  <span style="background-color: green; width: 10px; height: 10px; display: inline-block;"></span> Subarea South A  <span style="background-color: lightgreen; width: 10px; height: 10px; display: inline-block;"></span> Subarea South B</p> <p>3J CONSULTING  <small>City Engineering   Community Planning   Project Management</small>  <b>UGB Expansion Areas</b>                      May 2022</p>		<b>Local Mobility</b>	Has close proximity to established roadway and active transportation infrastructure, allowing for numerous multi-modal connections that are intuitive and feasible	<b>0</b>	Area is located south of US 26 which has no local street connectivity to the established North Plains grid network. A connection is available via NW Glencoe Road, but traversing this corridor is not ideal for all ages and abilities.
<b>Regional Mobility</b>	Provides direct, convenient, and efficient access to regional travel infrastructure.	<b>+2</b>	Regional mobility is direct and convenient via NW Glencoe Road and the adjacent US 26/NW Glencoe Road interchange.		
<b>Safe Access</b>	Has safe and convenient access to schools, parks, shopping, and employment centers	<b>0</b>	Adjacent land uses and infrastructure are vehicle centric with limited access for people walking, biking, rolling. Access to essential destinations will require traversing the US 26/NW Glencoe Road interchange.		
<b>Environmental</b>	Avoids environmental impacts, including those to wetlands, streams, and exclusion areas.	<b>+2</b>	No known environmental or sensitive areas have been identified.		
<b>Feasibility</b>	Avoids necessary changes to existing and planned infrastructure identified in adopted planning documents.	<b>0</b>	The US 26/NW Glencoe Road Interchange Area Management Plan assumed limited future development/urbanization along the NW Beach Road corridor. Future urbanization assumptions would require an updated IAMP to reevaluate and assess interchange infrastructure and access management upgrades. Urban standard upgrades would be needed along NW Beach Road and NW Glencoe Road.		
<b>Balanced System</b>	Provides equal opportunity of transportation choices and avoids reliance upon any one mode	<b>0</b>	Development will attract vehicular centric activity in an area with limited active transportation connectivity.		
<b>Summary</b>					
South Subarea B has strong regional mobility potential due to its proximity to the NW Glencoe Road interchange. However, US 26 serves as a barrier to South Subarea B and limits future connectivity to the urbanized segments of North Plains.					



Table 22: Factor 2 Transportation West Subarea Summary and Evaluation

WEST SUBAREA		Transportation Evaluation Criteria		Evaluation Results	
Concept Description and Illustration		Evaluation Criteria	Ideal Definition	Score (0 - +2)	Comments
<p>The West Subarea is bounded by Dersham Road (west), US 26 (south), and NW Gordon Road (east). The northern boundary of West Subarea is not confined by a physical limitation.</p>		<b>Local Mobility</b>	Has close proximity to established roadway and active transportation infrastructure, allowing for numerous multi-modal connections that are intuitive and feasible	<b>+1</b>	Local street extensions across NW Gordon Road are limited based on existing development patterns and environmentally sensitive areas. There are opportunities to integrate collector street extensions via NW North Avenue, NW Commercial Street, and NW Cottage Street.
		<b>Regional Mobility</b>	Provides direct, convenient, and efficient access to regional travel infrastructure	<b>+2</b>	Regional connections are more directly available to the US 26/NW Dersham Road interchange via NW Mountindale Road and NW Dersham Road. Significant levels of potential development may require modernization and upgrades of the US 26/Dersham Road interchange.
		<b>Safe Access</b>	Has safe and convenient access to schools, parks, shopping, and employment centers	<b>0</b>	Access to NW North Avenue and NW Commercial Street provide connections to essential destinations (North Plains Elementary School, parks, library, downtown amenities). Area connectivity will rely on upgrades to rural unimproved County roadways.
		<b>Environmental</b>	Avoids environmental impacts, including those to wetlands, streams, and exclusion areas.	<b>+1</b>	A small portion of the eastern area has some known environmental constraints.
		<b>Feasibility</b>	Avoids necessary changes to existing and planned infrastructure identified in adopted planning documents.	<b>0</b>	Railroad infrastructure splits the lower portion of the Area limiting the ability to integrate potential extensions of the NW Commercial Street and NW Cottage Street corridors. Development will require urban standard roadway upgrades to NW Mountindale Road, NW Gordon Road, NW Dersham Road, and Pumpkin Ridge Road.
		<b>Balanced System</b>	Provides equal opportunity of transportation choices and avoids reliance upon any one mode	<b>+1</b>	Future development can integrate into the adjacent multimodal system, but it will require the extension and integration of new connections across the NW Gordon Road and NW Mountindale Road. Transportation choices for the northern area will be most convenient and accessible through vehicular travel.
<b>Summary</b>					
The West Subarea has strong regional mobility potential to its proximity to the NW Dersham Road interchange. Integration with existing North Plains multimodal infrastructure to the east is challenged in many locations due to development patterns that limit local street connectivity, environmental constraints, and a railroad splitting the lower portion of the area. To establish connectivity, the eastern portion of the area would need to develop first and integrate into existing street networks. Development will rely on extension of NW North Avenue and urban upgrades of NW Mountindale Road.					

Table 23: Factor 2 Transportation East Subarea Summary and Evaluation

EAST SUBAREA		Transportation Evaluation Criteria		Evaluation Results	
Concept Description and Illustration		Evaluation Criteria	Ideal Definition	Score (0 - +2)	Comments
<p>The East Subarea is broken up into two portions. The larger portion is bounded by NW West Union Road (north), new residential development and Atfalati Ridge Elementary School (north), US 26 (south) and NW Jackson School Road (east). The smaller portion of the East Subarea is bounded by the railroad (north), industrial land uses adjacent to NW 298th Place (west), NW Jackson School Road (east) and NW West Union Road (south).</p> <p><b>Map Data:</b></p> <ul style="list-style-type: none"> <li><b>North:</b> Total: 397 acres, Constrained: 15 acres</li> <li><b>West:</b> Total: 493 acres, Constrained: 9 acres</li> <li><b>South A:</b> Total: 114 acres, Constrained: 0 acres</li> <li><b>South B:</b> Total: 38 acres, Constrained: 0 acres</li> <li><b>East:</b> Total: 515 acres, Constrained: 71 acres</li> </ul> <p><b>Legend:</b></p> <ul style="list-style-type: none"> <li>North Plains UGB (Blue outline)</li> <li>City Limits (Black outline)</li> <li>UGB Subareas (Colored areas)</li> <li>Subarea North (Red)</li> <li>Subarea East (Yellow)</li> <li>Subarea West (Blue)</li> <li>Subarea South A (Green)</li> <li>Subarea South B (Light Green)</li> <li>Constraints* (Cross-hatched areas)</li> <li>*Open Water, Floodplain, Steep Slopes</li> </ul> <p>Scale: 0 to 4,000 US Feet (0 to 1 Miles)</p> <p>3J CONSULTING UGB Expansion Areas May 2022</p>		<b>Local Mobility</b>	Has close proximity to established roadway and active transportation infrastructure, allowing for numerous multi-modal connections that are intuitive and feasible	<b>+1</b>	While close in proximity to the established local street network, local street extensions to the west are challenging due to McKay Creek. Local mobility will need to rely on access via NW West Union Road or a future connection over McKay Creek.
		<b>Regional Mobility</b>	Provides direct, convenient, and efficient access to regional travel infrastructure.	<b>+2</b>	Regional connections are available via NW West Union Road and NW Jackson School Road. The southeast portion has direct access to the NW Jackson School Road interchange which provides convenient regional mobility to the US 26 corridor.
		<b>Safe Access</b>	Has safe and convenient access to schools, parks, shopping, and employment centers	<b>+1</b>	Atfalati Ridge School and Sunset Ridge Park are located within the Subarea. Access to destinations in downtown are limited to NW West Union Road by McKay Creek. A shared use path along NW West Union Road provides safe access; however, the distance and reliance of a single connection are less favorable.
		<b>Environmental</b>	Avoids environmental impacts, including those to wetlands, streams, and exclusion areas.	<b>0</b>	Large portions of the East Area, primarily the western half are traversed by McKay Creek.
		<b>Feasibility</b>	Avoids necessary changes to existing and planned infrastructure identified in adopted planning documents.	<b>+1</b>	Future development in the eastern portion can occur without major investment upgrades to existing system as recent development in the Sunset Ridge subdivision was built to accommodate future roadway connections. The western portions of the East Area will require connections that navigate McKay Creek.
		<b>Balanced System</b>	Provides equal opportunity of transportation choices and avoids reliance upon any one mode	<b>+1</b>	Area provides an opportunity to balance transportation choices (if McKay Creek can be spanned) while also serving regional connections.
		<b>Summary</b>			
		In the East subarea, local mobility, safe access, and balanced multimodal connectivity to the established North Plains infrastructure to the west are limited by the need to span the McKay Creek corridor or rely on NW West Union Road. The western portion of the Subarea contains a large swath of environmentally sensitive land. The eastern portion of the Subarea has strong regional access and connectivity NW Jackson School Road interchange. The Subarea has strong opportunity for a mix of uses and development types.			

## **2b. ORDERLY AND ECONOMIC PROVISION OF PUBLIC FACILITIES AND SERVICES: PUBLIC UTILITIES**

The following presents utility-related assessments for the City of North Plains to evaluate the serviceability for water, sanitary sewer, and storm drainage in UGB expansion subareas.

### **Subarea Evaluation and Utility Criteria**

Utility improvements required to serve the proposed UGB expansion subareas were evaluated by reviewing relevant plans and policies, City Master Plans, existing infrastructure mapping, location of subareas, and other relevant information obtained from City staff.

Utility service needs of the UGB expansion areas are evaluated based on the following utility criteria:

#### Sanitary Sewer Service

- Does the subarea have existing sanitary infrastructure to support development?
- Does the subarea have planned sanitary infrastructure upgrades to support development?
- Is a mainline extension required to serve the subarea?
- Are there any identified deficiencies within or adjacent to the subarea?
- Relative to other options, what is the cost to provide service?

#### Storm Drainage Service

- Does the subarea have existing storm infrastructure to support development?
- Does the subarea have planned storm infrastructure upgrades to support development?
- Is a mainline extension required to serve the subarea?
- Are there any identified deficiencies within or adjacent to the subarea?
- Relative to other options, what is the cost to provide service?

#### Water Service

- Does the subarea have existing water infrastructure to support development?
- Does the subarea have planned water infrastructure upgrades to support development?
- Is a mainline extension required to serve the subarea?
- Are there any identified deficiencies within or adjacent to the subarea?
- Relative to other options, what is the cost to provide service?

### **Evaluation Methodology**

A scoring matrix was created to evaluate each subarea's utility service needs. The subareas are evaluated on Sanitary Sewer, Storm Drainage and Water with a scoring scale of 0 – +2.

The "Ideal Definition" summarizes the description in achieving the highest value (+2). Subareas that do not meet the ideal definition are scored zero (0), while subareas that partially meet the ideal definition are scored one (+1).

Tables 24-28 list evaluation criteria, results, and an overall utility service summary.

**Summary of Findings**

The East Subarea is the best prepared for expansion. The subarea has the best existing and planned utility infrastructure to support development with a low cost to provide utility service to the subareas. The North Subarea is the next best for development with existing water and storm infrastructure support, however, sanitary upsizing would be required.

South A Subarea, South B Subarea and West Subarea are the least prepared for expansion based on the utility evaluations. These subareas require the most infrastructure development and cost to provide utility service.

Table 24: Factor 2 Public Utilities North Subarea Utility Summary and Evaluation

NORTH SUBAREA	Utility Evaluation Criteria		Evaluation Results	
Concept Description and Illustration	Evaluation Criteria	Ideal Definition	Score (0 - 2)	Comments
<p>The North Subarea is bounded by Pumpkin Ridge Golf Club (north), Pumpkin Ridge Road and Mountaindale Road (west), North Avenue and recently incorporated, undeveloped land (south), and Shadybrook Road (east).</p>	<p><b>Sanitary Service</b></p>	<p>Has existing sanitary infrastructure or planned sanitary infrastructure to support development.</p>	<p>0</p>	<p>Existing sanitary facilities located just South of Subarea are not sized for expansion. Sanitary connections will be present, but downstream upgrades are required to serve the subarea.</p>
	<p><b>Storm Service</b></p>	<p>Has existing storm infrastructure or planned storm infrastructure to support development.</p>	<p>2</p>	<p>Existing storm facilities located just South of Subarea are adequately prepared for expansion. Storm connections will be present with the planned development to the south.</p>
	<p><b>Water Service</b></p>	<p>Has existing water infrastructure or planned water infrastructure to support development.</p>	<p>2</p>	<p>Proposed water facilities spread through entire region just South of Subarea. Water connections will be present with the planned development to the south.</p>
	<p><b>Summary</b></p> <p>North Subarea has the potential to naturally tie into existing or planned storm and water infrastructure without the need for mainline extensions. The area just south of North Subarea is currently under development and will be completed within the next few years. Sanitary infrastructure exists in several regions just South of the Subarea, which will provide multiple tie in points but the system will likely need to be upsized to support the subarea development. The storm infrastructure has multiple tie in locations; but ditches also remain. The water system should provide many tie in points as there are many proposed locations adjacent North Subarea.</p> <p>The cost to support the North Subarea is moderate since the downstream sanitary system will need upsizing.</p>			

Table 25: Factor 2 Public Utilities South Subarea A Utility Summary and Evaluation

SOUTH SUBAREA A		Utility Evaluation Criteria		Evaluation Results	
Concept Description and Illustration		Evaluation Criteria	Ideal Definition	Score (0 - 2)	Comments
<p>South Subarea A is bounded by US 26 (north/northeast), NW Gordon Road (west), and NW 316th Place (east). South Subarea A is largely built out with large lot residential parcels. The subarea is divided by the Sunset Air Strip, a private airport managed and owned by the residential neighborhood located within South Subarea A.</p>		<b>Sanitary Service</b>	Has existing sanitary infrastructure or planned sanitary infrastructure to support development.	0	No existing or proposed sanitary infrastructure on South side of US 26 near or adjacent to the subarea.
<p><b>North</b> Total: 397 acres Constrained: 15 acres</p> <p><b>West</b> Total: 493 acres Constrained: 9 acres</p> <p><b>South A</b> Total: 114 acres Constrained: 0 acres</p> <p><b>South B</b> Total: 38 acres Constrained: 0 acres</p> <p><b>East</b> Total: 515 acres Constrained: 71 acres</p> <p>Legend:                  North Plains UGB (blue outline)                  City Limits (dashed line)                  UGB Subareas (colored areas)                  Constraints* (hatched areas)                  *Open Water, Floodplain, Steep Slopes</p> <p>Scale:                  0 1,000 2,000 4,000 US Feet                  0 0.25 0.5 1 Miles</p> <p>3J CONSULTING                  UGB Expansion Areas                  May 2022</p>		<b>Storm Service</b>	Has existing storm infrastructure or planned sanitary infrastructure to support development.	0	No existing or proposed sanitary infrastructure on South side of US 26 near or adjacent to the subarea.
		<b>Water Service</b>	Has existing water infrastructure or planned sanitary infrastructure to support development.	0	Nearest water infrastructure is on other side of US 26; JWC Supply Pipeline runs through South B Subarea, but will require PRV for service in the area.
		<p><b>Summary</b></p> <p>South A Subarea does not have readily available sanitary, storm, or water infrastructure to tie into. Existing and proposed sanitary and storm infrastructure exist on the other side of US 26 (east side) and nearby water infrastructure located in South Subarea B relies on an addition of a PRV to the JWC Supply Pipeline. Mainline extensions for sanitary, storm and water would be required to service the subarea.</p> <p>The cost to support the South A Subarea would be significant comparatively to other subareas due to the need to build supportive utility infrastructure to service the area.</p>			

Table 26: Factor 2 Public Utilities South Subarea B Utility Summary and Evaluation

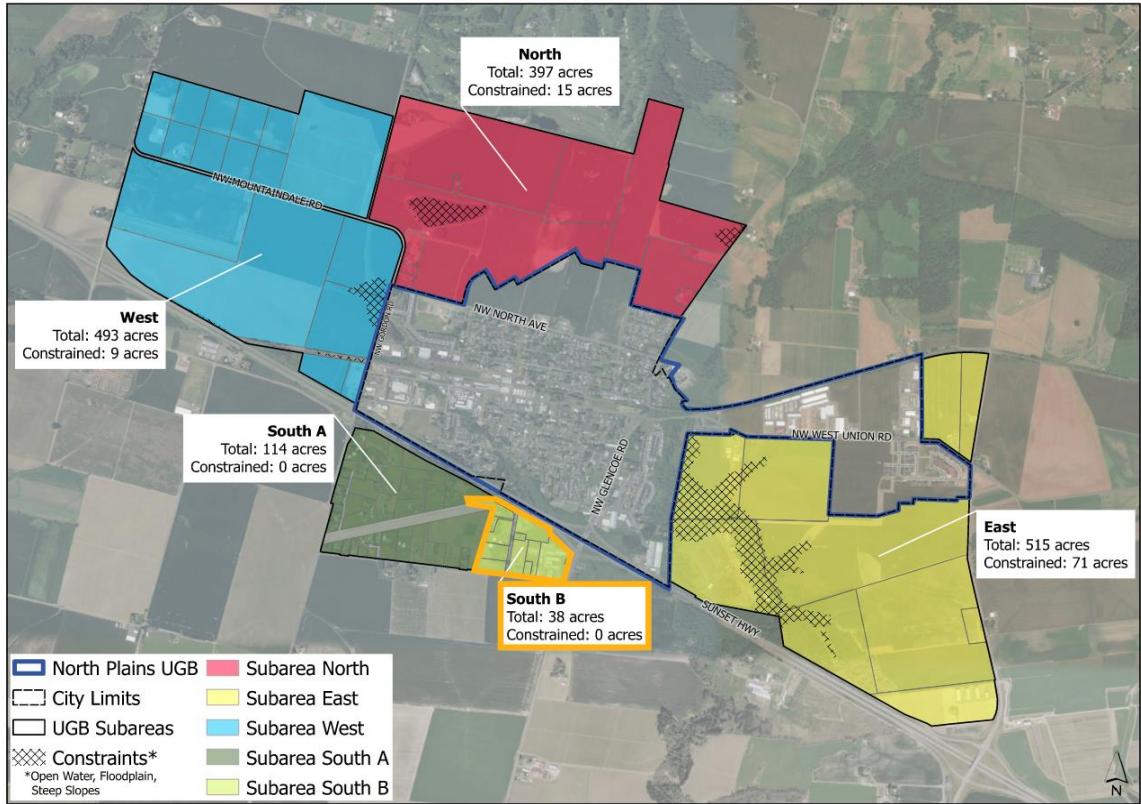
SOUTH SUBAREA B		Utility Evaluation Criteria		Evaluation Results	
Concept Description and Illustration		Evaluation Criteria	Ideal Definition	Score (0 - 2)	Comments
<p>South B Subarea is bounded by US 26 (north), NW 316th Place (west), NW Beach Road (south), and NW Glencoe Road (east).</p>  <p><b>North</b> Total: 397 acres Constrained: 15 acres</p> <p><b>West</b> Total: 493 acres Constrained: 9 acres</p> <p><b>South A</b> Total: 114 acres Constrained: 0 acres</p> <p><b>South B</b> Total: 38 acres Constrained: 0 acres</p> <p><b>East</b> Total: 515 acres Constrained: 71 acres</p> <p>Legend:  <span style="color: blue;">■</span> North Plains UGB  <span style="border: 1px dashed black; display: inline-block; width: 10px; height: 10px;"></span> City Limits  <span style="border: 1px solid black; display: inline-block; width: 10px; height: 10px;"></span> UGB Subareas  <span style="border: 1px dashed black; display: inline-block; width: 10px; height: 10px;"></span> Constraints*  <small>*Open Water, Floodplain, Steep Slopes</small>  <span style="color: red;">■</span> Subarea North  <span style="color: yellow;">■</span> Subarea East  <span style="color: cyan;">■</span> Subarea West  <span style="color: green;">■</span> Subarea South A  <span style="color: limegreen;">■</span> Subarea South B</p> <p>Scale: 0 1,000 2,000 4,000 US Feet 0 0.25 0.5 1 Miles</p> <p>3J CONSULTING May 2022</p>		<b>Sanitary Service</b>	Has existing sanitary infrastructure or planned sanitary infrastructure to support development.	0	No existing or proposed sanitary infrastructure on South side of US 26 between Gordon Rd and Glencoe Rd.
		<b>Storm Service</b>	Has existing storm infrastructure or planned sanitary infrastructure to support development.	0	No existing or proposed sanitary infrastructure on South side of US 26 between Gordon Rd and Glencoe Rd.
		<b>Water Service</b>	Has existing water infrastructure or planned sanitary infrastructure to support development.	1	Nearest water infrastructure is on other side of US 26. JWC Supply Pipeline runs through the subarea, but will require PRV for service in the area.
<b>Summary</b>					
<p>South B Subarea does not have readily available sanitary or storm infrastructure to tie into; available water infrastructure relies on an addition of a PRV to the JWC Supply Pipeline. Existing and proposed sanitary and storm infrastructure exist on the other side of US 26 (east side). Mainline extensions for sanitary and storm would be required to service the subarea.</p> <p>The cost to support the South B Subarea would be significant comparatively to other subareas due to the need to build supportive utility infrastructure to service the area.</p>					

Table 27: Factor 2 Public Utilities West Subarea Utility Summary and Evaluation

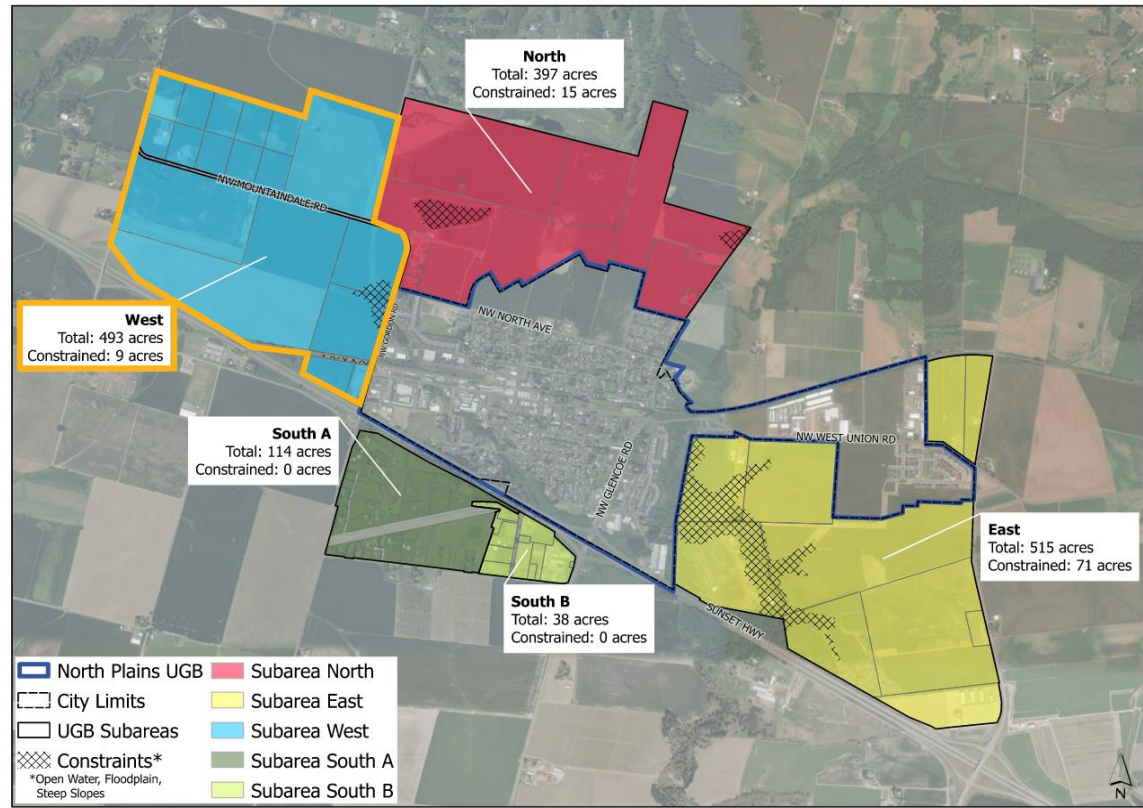
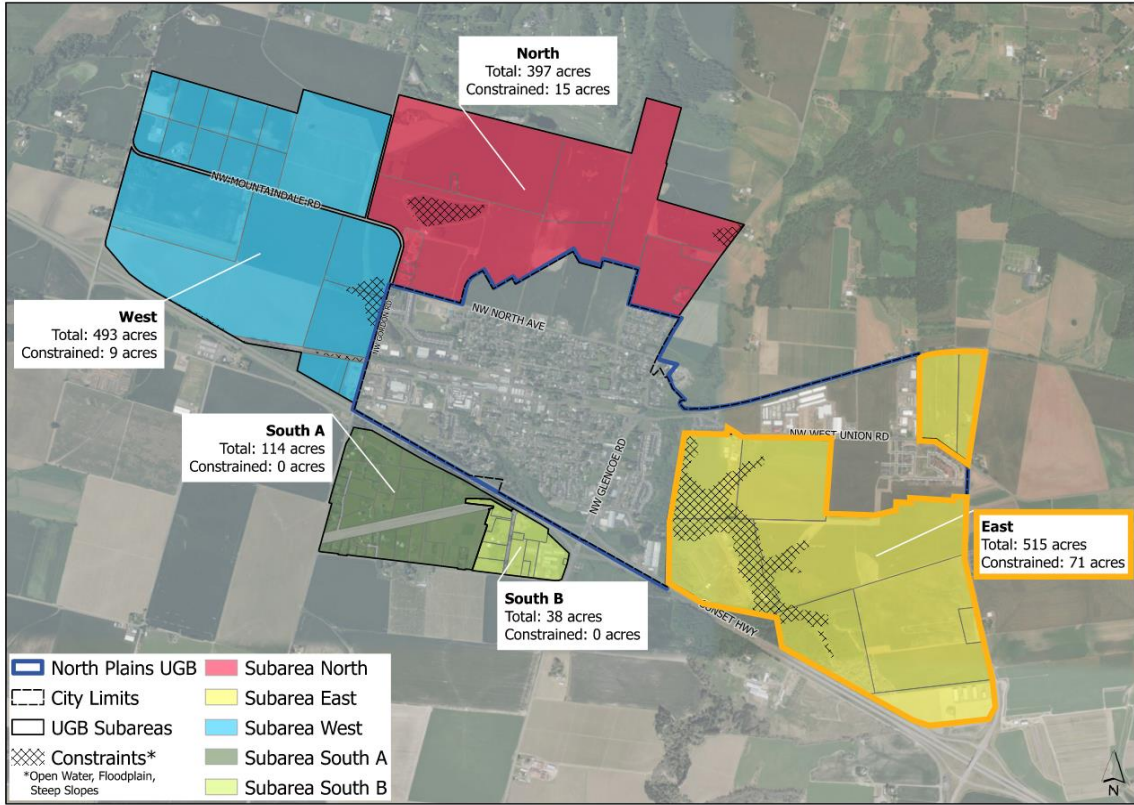
WEST SUBAREA		Utility Evaluation Criteria		Evaluation Results	
Concept Description and Illustration		Evaluation Criteria	Ideal Definition	Score (0 - 2)	Comments
<p>The West Subarea is bounded by Dersham Road (west), US 26 (south), and NW Gordon Road (east). The northern boundary of West Subarea is not confined by a physical limitation.</p>  <p><b>West</b> Total: 493 acres Constrained: 9 acres</p> <p><b>North</b> Total: 397 acres Constrained: 15 acres</p> <p><b>South A</b> Total: 114 acres Constrained: 0 acres</p> <p><b>South B</b> Total: 38 acres Constrained: 0 acres</p> <p><b>East</b> Total: 515 acres Constrained: 71 acres</p> <p>Legend:  <span style="border: 1px solid blue; padding: 2px;"> </span> North Plains UGB  <span style="border: 1px solid black; padding: 2px;"> </span> City Limits  <span style="border: 1px solid gray; padding: 2px;"> </span> UGB Subareas  <span style="border: 1px dashed gray; padding: 2px;"> </span> Constraints*  <small>*Open Water, Floodplain, Steep Slopes</small>  <span style="background-color: #ffcccc; padding: 2px;"> </span> Subarea North  <span style="background-color: #ccffcc; padding: 2px;"> </span> Subarea East  <span style="background-color: #ccccff; padding: 2px;"> </span> Subarea West  <span style="background-color: #ccffcc; padding: 2px;"> </span> Subarea South A  <span style="background-color: #ccffcc; padding: 2px;"> </span> Subarea South B</p> <p>3J CONSULTING                  May 2022</p> <p>Scale: 0 1,000 2,000 4,000 US Feet                  0 0.25 0.5 1 Miles</p>		<b>Sanitary Service</b>	Has existing sanitary infrastructure or planned sanitary infrastructure to support development.	0	Existing sanitary infrastructure exists at the southeastern edge of West Subarea and existing infrastructure near the northeastern edge isn't far. A pump station and mainline extension will likely be required to support the entire subarea.
		<b>Storm Service</b>	Has existing storm infrastructure or planned sanitary infrastructure to support development.	1	Existing storm infrastructure exists along the eastern edge of the subarea. Ditches and creeks exist along the eastern portion of the UGB. Mainline extension or downstream deficiency upgrades would be required to support the entire subarea.
		<b>Water Service</b>	Has existing water infrastructure or planned sanitary infrastructure to support development.	1	Existing and proposed water infrastructure adjacent UGB and West Subarea. Upgrades to identified deficiencies would need to occur.
<b>Summary</b>					
<p>West Subarea has the potential to naturally tie into storm infrastructure for some portions of the subarea. A sanitary pump station will likely be required to support the subarea. Existing water infrastructure adjacent to the West Subarea has identified deficiencies which would need to be upgraded to support servicing subarea. The potential need for sanitary or storm mainline extension would likely be required to support the entire subarea.</p> <p>The cost to support the West Subarea would be significant comparatively to other subareas.</p>					



Table 28: Factor 2 Public Utilities East Subarea Utility Summary and Evaluation

EAST SUBAREA	Utility Evaluation Criteria		Evaluation Results	
Concept Description and Illustration	Evaluation Criteria	Ideal Definition	Score (0 - 2)	Comments
<p>The East Subarea is broken up into two portions. The larger portion is bounded by NW West Union Road (north), new residential development and Atfalati Ridge Elementary School (north), US 26 (south) and NW Jackson School Road (east). The smaller portion of the East Subarea is bounded by the railroad (north), industrial land uses adjacent to NW 298th Place (west), NW Jackson School Road (east), and NW West Union Road (south).</p>	<b>Sanitary Service</b>	Has existing sanitary infrastructure or planned sanitary infrastructure to support development.	2	Existing sanitary facilities exist at the north, south and middle of the subarea. The subarea is adequately prepared for expansion.
 <p><b>North</b> Total: 397 acres Constrained: 15 acres</p> <p><b>West</b> Total: 493 acres Constrained: 9 acres</p> <p><b>South A</b> Total: 114 acres Constrained: 0 acres</p> <p><b>South B</b> Total: 38 acres Constrained: 0 acres</p> <p><b>East</b> Total: 515 acres Constrained: 71 acres</p> <p>Legend:  <span style="color: blue;">█</span> North Plains UGB  <span style="border: 1px dashed black; display: inline-block; width: 10px; height: 10px;"></span> City Limits  <span style="border: 1px solid black; display: inline-block; width: 10px; height: 10px;"></span> UGB Subareas  <span style="background: repeating-linear-gradient(45deg, transparent, transparent 2px, black 2px, black 4px); border: 1px dashed black; display: inline-block; width: 10px; height: 10px;"></span> Constraints*  <small>*Open Water, Floodplain, Steep Slopes</small>  <span style="color: red;">█</span> Subarea North  <span style="color: yellow;">█</span> Subarea East  <span style="color: blue;">█</span> Subarea West  <span style="color: green;">█</span> Subarea South A  <span style="color: lightgreen;">█</span> Subarea South B</p> <p>3 J CONSULTING                  UGB Expansion Areas                  May 2022</p> <p>Scale: 0 1,000 2,000 4,000 US Feet                  0 0.25 0.5 1 Miles</p>	<b>Storm Service</b>	Has existing storm infrastructure or planned sanitary infrastructure to support development.	2	Existing storm facilities are adjacent to subarea and McKay Creek runs through the western portion of the subarea. The subarea is adequately prepared for expansion.
	<b>Water Service</b>	Has existing water infrastructure or planned sanitary infrastructure to support development.	2	Existing water facilities are adjacent to subarea to the north and planned water is adjacent to the subarea to the east. The subarea is adequately prepared for expansion. A fire flow deficiency has been identified at the most northeastern portion of the subarea where upgrades are required.
	<b>Summary</b>			
<p>East Subarea has the potential to naturally tie into the existing sanitary, storm, and water infrastructure. Sanitary infrastructure passes through the subarea and provides multiple tie in possibilities. Storm infrastructure is adjacent to the subarea along with McKay Creek running through the western portion of the subarea. Existing and planned water infrastructure is adjacent to the subarea in multiple locations, however, there is an identified fire flow deficiency at the northeastern most portion of the subarea which will need to be fixed prior to development of that portion. With multiple tie in points for each of the previously listed utilities, the area is well equipped for expansion.</p> <p>The cost to support the East Subarea is low since most infrastructure exists or is already planned.</p>				

### 3. COMPARATIVE ENVIRONMENTAL, ENERGY, ECONOMIC AND SOCIAL CONSEQUENCES

The Goal 14 Boundary Location Factor Analysis requires research of the Economic, Social, Environmental, and Energy (ESEE) consequences of developing within each proposed subarea. The ESEE consequences were used to determine potential positive or negative consequences of development. Like the other boundary location analyses, the ESEE analysis does not provide a definitive conclusion as to where the North Plains UGB should be expanded but contains information to help inform decision makers.

The ESEE consequences were identified using several points of data. Information was gleaned from Metro's Regional Land Information System, Google Earth, Washington County, and USDA Cropscape datasets. Each ESEE category was measured against a set metrics, and given a score from 0 to +2, with 0 being the lowest/most likely for negative consequences, and 2 being the highest/most likely for positive consequences. Each ESEE category was given a score based on potential **Residential** or **Employment** (industrial and commercial) uses, as shown in Tables 29-33.

#### **Economic**

The economic consequences of developing each subarea include:

- Cost of land/transportation facilities/utilities/services
- Parcel size (employment- specific uses)
- Development potential (i.e., existing uses)
- Balancing residential and employment priorities for a diversified tax base

#### **Social**

The social consequences of developing each subarea include:

- Ease of access to services such as schools, parks, library, commercial services
- Community health indicators such as increased physical activity via active transportation and recreational offerings
- Compatible nearby uses
- Cost of construction (i.e., cost of land and utility provision per unit or lot)
- Balancing residential and employment priorities to reverse the bedroom community trend

#### **Environmental**

The environmental consequences of developing each subarea include:

- Hazard Risk (slope, floodplain)
- Goal 5 resources present

#### **Energy**

The energy consequences of developing each subarea include:

- Ability to reduce VMT of development
- Alternate modes of transportation feasible
- Heating/cooling of structures (i.e., existing large trees)

• Table 29: Factor 3 North Subarea Summary and Evaluation

NORTH SUBAREA		Evaluation Criteria		Evaluation Results	
Description and Illustration		Evaluation Criteria	Ideal Definition	Score	Comments
<p>The North Subarea is bounded by Pumpkin Ridge Golf Club (north), Pumpkin Ridge Road and Mountindale Road (west), North Avenue and recently incorporated, undeveloped land (south), and Shadybrook Road (east).</p> <p><b>North</b> Total: 397 acres Constrained: 15 acres</p> <p><b>West</b> Total: 493 acres Constrained: 9 acres</p> <p><b>South A</b> Total: 114 acres Constrained: 0 acres</p> <p><b>South B</b> Total: 38 acres Constrained: 0 acres</p> <p><b>East</b> Total: 515 acres Constrained: 71 acres</p> <p>Legend:  <span style="border: 1px solid blue; padding: 2px;"> </span> North Plains UGB  <span style="border: 1px solid black; padding: 2px;"> </span> City Limits  <span style="border: 1px solid black; padding: 2px;"> </span> UGB Subareas  <span style="border: 1px dashed black; padding: 2px;"> </span> Constraints*  <small>*Open Water, Floodplain, Steep Slopes</small>  <span style="background-color: #ff0000; width: 10px; height: 10px; display: inline-block;"></span> Subarea North  <span style="background-color: #ffff00; width: 10px; height: 10px; display: inline-block;"></span> Subarea East  <span style="background-color: #00bfff; width: 10px; height: 10px; display: inline-block;"></span> Subarea West  <span style="background-color: #008000; width: 10px; height: 10px; display: inline-block;"></span> Subarea South A  <span style="background-color: #90ee90; width: 10px; height: 10px; display: inline-block;"></span> Subarea South B</p> <p>3J CONSULTING  <small>Our Engineering   Community Planning   Project Management</small></p> <p>UGB Expansion Areas  May 2022</p> <p>Scale: 0 1,000 2,000 4,000 US Feet  0 0.25 0.5 1 Miles</p>		<p><b>Economic</b></p> <ul style="list-style-type: none"> <li>• Low cost of land/transportation facilities/utilities/services</li> <li>• Variety of parcel sizes</li> <li>• High development potential</li> </ul>	<p><b>R=2</b> <b>E=1</b></p>	<p>Land uses south of the North Subarea are predominantly residential (R-2.5 and R-7.5). The new Brynhill Development adds about 500 residential units and the new North Plains Elementary School. The North Subarea consists of large parcels, which may have positive outcomes for development return on investment, and sanitary sewer and water service can efficiently tie into existing and planned infrastructure. Plans to extend Main Street north are conducive to development.</p>	
		<p><b>Social</b></p> <ul style="list-style-type: none"> <li>• Easy access to services</li> <li>• Active transportation and recreational offerings</li> <li>• Compatible nearby uses</li> <li>• Lower cost of construction</li> </ul>	<p><b>R=2</b> <b>E=1</b></p>	<p>No steep slopes or other hazards exist in the subarea. The North Subarea abuts residential uses and the North Plains Elementary School to the south. The subarea is in close proximity to commercial activities in downtown North Plains. Due to these considerations, the North Subarea has the potential for continuous and safe multimodal transportation networks, which is a safety benefit to residents, students, and visitors. The subarea does contain two cemetery sites on small lots, and the Lind Reservoir area is likely to development as park land in the future.</p>	
		<p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>• No presence of Goal 5 resources</li> <li>• Low hazard risks</li> </ul>	<p><b>R=2</b> <b>E=2</b></p>	<p>Future development in the North Subarea will need to account for the Lind Reservoir, which is classified as a wetland, and a few smaller environmental constraints. The area does not contain steep slopes, streams, or other areas of environmental constraints.</p>	
		<p><b>Energy</b></p> <ul style="list-style-type: none"> <li>• Opportunities to reduce VMT of development</li> <li>• Opportunities for alternate modes of transportation</li> <li>• Presence of heating/cooling structures</li> </ul>	<p><b>R=1</b> <b>E=1</b></p>	<p>As opportunities exist to connect North Subarea to the urbanized areas of North Plains via NW North Ave and Main St, the subarea has strong potential to provide multimodal transportation options to residents and visitors, resulting in decreased VMT. The area does not currently have a vast or established tree canopy as agricultural uses cover much of the area.</p>	
		<p><b>Summary</b></p> <p>The North Subarea, consists of large, unconstrained parcels, is adjacent to residential uses and can tie in efficiently to city utilities and existing and planned vehicle and active transportation networks. The Lind Reservoir could develop as park land, creating recreational opportunities for residents, and the ease of access to commercial services in the subarea, as well as nearby areas, reduces VMT.</p>			

Table 30: Factor 3 South A Subarea Summary and Evaluation

SOUTH SUBAREA A		Evaluation Criteria		Evaluation Results	
Description and Illustration		Evaluation Criteria	Metrics	Score	Comments
<p>South Subarea A is bounded by US 26 (north/northeast), NW Gordon Road (west), and NW 316th Place (east). South Subarea A is largely built out with large lot residential parcels. The subarea is divided by the Sunset Air Strip, a private airport managed and owned by the residential neighborhood located within South Subarea A.</p> <p><b>North</b> Total: 397 acres Constrained: 15 acres</p> <p><b>West</b> Total: 493 acres Constrained: 9 acres</p> <p><b>South A</b> Total: 114 acres Constrained: 0 acres</p> <p><b>South B</b> Total: 38 acres Constrained: 0 acres</p> <p><b>East</b> Total: 515 acres Constrained: 71 acres</p> <p>Legend:  <span style="color: blue;">█</span> North Plains UGB  <span style="color: red;">█</span> Subarea North  <span style="color: yellow;">█</span> Subarea East  <span style="border: 1px dashed black;"> </span> City Limits  <span style="border: 1px solid black;"> </span> UGB Subareas  <span style="background: repeating-linear-gradient(45deg, transparent, transparent 2px, black 2px, black 4px); border: 1px dashed black;"> </span> Constraints*  <span style="color: green;">█</span> Subarea South A  <span style="color: lightgreen;">█</span> Subarea South B  <small>*Open Water, Floodplain, Steep Slopes</small></p> <p>Scale: 0 1,000 2,000 4,000 US Feet / 0 0.25 0.5 1 Miles</p> <p>3J CONSULTING Engineering   Community Planning   Project Management UGB Expansion Areas May 2022</p>		<b>Economic</b>	<ul style="list-style-type: none"> <li>• Low cost of land/transportation facilities/utilities/services</li> <li>• Variety of parcel sizes</li> <li>• High development potential</li> </ul>	<b>R=0</b> <b>E=0</b>	Parcels south of South Subarea A are primarily residential and agricultural. Zoning includes 22 parcels of RR-5, 15 parcels of AF-5, one parcel of AF-20, and three parcels of EFU. Most of the area is within the Air Acres development and the Sunset Airstrip overlay districts. Compared to other subareas, many of the lots in South Subarea A are small and considered exception land. Highway 26 provides regional mobility, but is a barrier to reaching North Plains' civic and commercial amenities by walking or biking. Internal circulation would be a challenge due to the air strip. Utilities development would be costly as mainline extensions would be required for water and sanitary sewer.
		<b>Social</b>	<ul style="list-style-type: none"> <li>• Easy access to services</li> <li>• Active transportation and recreational offerings</li> <li>• Compatible nearby uses</li> <li>• Lower cost of construction</li> </ul>	<b>R=0</b> <b>E=1</b>	Highway 26 separates South Subarea A from the current North Plains UGB. This physical and mental barrier may have negative social consequences for residents and visitors traveling to and from South Subarea A. Air Acres residences to the south of South Subarea A hold restrictive covenants and development specifications in accordance with the airport overlay district, which could create a disjointed residential area. Utilities development would be costly as mainline extensions would be required for water and sanitary sewer.
		<b>Environmental</b>	<ul style="list-style-type: none"> <li>• No presence of Goal 5 resources</li> <li>• Low hazard risks</li> </ul>	<b>R=2</b> <b>E=2</b>	South Subarea A does not contain wetlands, steep slopes, or floodplains.
		<b>Energy</b>	<ul style="list-style-type: none"> <li>• Opportunities to reduce VMT of development</li> <li>• Opportunities for alternate modes of transportation</li> <li>• Presence of heating/cooling structures</li> </ul>	<b>R=0</b> <b>E=0</b>	While South Subarea A is connected regionally via Highway 26, the area is separated from urbanized North Plains via the highway. Ultimately, this may cause auto-centric development, which has negative implication for VMT and alternative modes of transportation. Current agricultural uses do not support an established and extensive tree canopy.
		<b>Summary</b>			
		South Subarea A is not well-suited for future development. Highway 26 creates a physical and mental barrier to the urbanized areas of North Plains. The adjacent Air Acres development and the airport overlay district hold restrictive covenants or development specifications, which could create a disjointed residential area, and vehicle-centric development in the area would increase VMT.			

Table 31: Factor 3 South Subarea B Summary and Evaluation

SOUTH SUBAREA B		Evaluation Criteria		Evaluation Results	
Description and Illustration		Evaluation Criteria	Metrics	Score	Comments
<p>South Subarea B is bounded by US 26 (north), NW 316<sup>th</sup> Place (west), NW Beach Road (south), and NW Glencoe Road (east).</p>		<b>Economic</b>	<ul style="list-style-type: none"> <li>• Low cost of land/transportation facilities/utilities/services</li> <li>• Variety of parcel sizes</li> <li>• High development potential</li> </ul>	<p><b>R=0</b> <b>E=2</b></p>	<p>Current uses in South Subarea B are agricultural and rural industrial (R-IND) and rural commercial (R-COM), including a retail and wholesale seed company, Jewett Cameron Seed Company, on the R-IND and R-COM parcels. The subarea is predominantly exception land. Highway 26 and Glencoe Rd provide regional and local access, and adjacent uses to the north include C-2 (Highway Commercial) and North Plains Veteran Park. Highway 26 provides visibility to commercial uses in the subarea. Utilities for water, sanitary sewer, and stormwater would have to be developed in the subarea.</p>
		<b>Social</b>	<ul style="list-style-type: none"> <li>• Easy access to services</li> <li>• Active transportation and recreational offerings</li> <li>• Compatible nearby uses</li> <li>• Lower cost of construction</li> </ul>	<p><b>R=0</b> <b>E=2</b></p>	<p>Highway 26 and Glencoe Road provide visibility to commercial uses in the subarea, but it is a barrier for residential uses. Current land uses and zoning in the subarea are supportive of commercial or industrial development.</p>
		<b>Environmental</b>	<ul style="list-style-type: none"> <li>• No presence of Goal 5 resources</li> <li>• Low hazard risks</li> </ul>	<p><b>R=2</b> <b>E=2</b></p>	<p>South Subarea B does not contain steep slopes, wetlands, or floodplains.</p>
		<b>Energy</b>	<ul style="list-style-type: none"> <li>• Opportunities to reduce VMT of development</li> <li>• Opportunities for alternate modes of transportation</li> <li>• Presence of heating/cooling structures</li> </ul>	<p><b>R=0</b> <b>E=1</b></p>	<p>Residential development of South Subarea B would encourage auto-centric development as Highway 26 makes it difficult to connect via alternative modes of transportation. This would have negative implications for VMT. The area is currently used as industrial and commercial spaces, so redevelopment with similar uses would be more efficient.</p>
<b>Summary</b>					
<p>Land uses and zoning in South Subarea B support commercial and industrial uses, increasing the diversity of economic offerings in North Plains. Highway 26 acts as a benefit to auto-centric commercial activities due to accessibility and visibility.</p>					

Table 32: Factor 3 West Subarea Summary and Evaluation

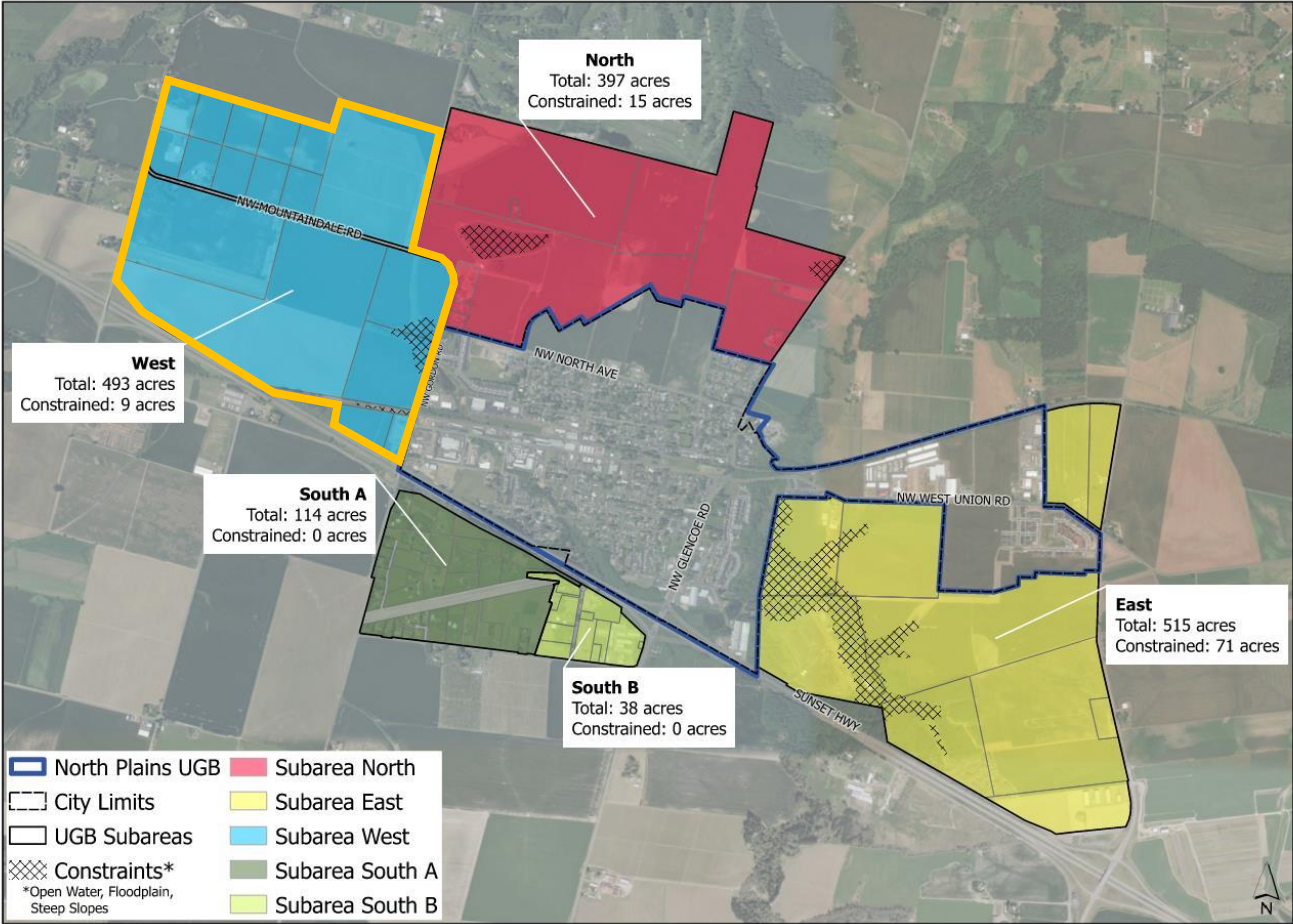
WEST SUBAREA		Evaluation Criteria		Evaluation Results	
Description and Illustration		Evaluation Criteria	Metrics	Score	Comments
<p>The West Subarea is bounded by Dersham Road (west), US 26 (south), and NW Gordon Road (east). The northern boundary of West Subarea is not confined by a physical limitation.</p>  <p><b>West</b> Total: 493 acres Constrained: 9 acres</p> <p><b>North</b> Total: 397 acres Constrained: 15 acres</p> <p><b>South A</b> Total: 114 acres Constrained: 0 acres</p> <p><b>South B</b> Total: 38 acres Constrained: 0 acres</p> <p><b>East</b> Total: 515 acres Constrained: 71 acres</p> <p>Legend:  <span style="border: 1px solid blue; padding: 2px;"> </span> North Plains UGB  <span style="border: 1px dashed black; padding: 2px;"> </span> City Limits  <span style="border: 1px solid black; padding: 2px;"> </span> UGB Subareas  <span style="border: 1px dashed black; padding: 2px;"> </span> Constraints*  <small>*Open Water, Floodplain, Steep Slopes</small>  <span style="background-color: #FFC0CB; border: 1px solid black; padding: 2px;"> </span> Subarea North  <span style="background-color: #FFFFE0; border: 1px solid black; padding: 2px;"> </span> Subarea East  <span style="background-color: #ADD8E6; border: 1px solid black; padding: 2px;"> </span> Subarea West  <span style="background-color: #90EE90; border: 1px solid black; padding: 2px;"> </span> Subarea South A  <span style="background-color: #9ACD32; border: 1px solid black; padding: 2px;"> </span> Subarea South B</p> <p>Scale: 0 1,000 2,000 4,000 US Feet 0 0.25 0.5 1 Miles</p> <p>3J CONSULTING May 2022</p>		<b>Economic</b>	<ul style="list-style-type: none"> <li>• Low cost of land/transportation facilities/utilities/services</li> <li>• Variety of parcel sizes</li> <li>• High development potential</li> </ul>	<b>R=2</b> <b>E=2</b>	Areas adjacent to city limits in the West Subarea are conducive to future development. Land uses east of the subarea are primarily industrial. Large, unconstrained lots and access to Highway 26 and local connectors such as NW Gordon Rd and NW Commercial St support future development. Eastern portions of the subarea could efficiently tie into existing sanitary sewer and water utilities. Development further west would be contingent upon development to the east to tie into the local street network and utilities.
		<b>Social</b>	<ul style="list-style-type: none"> <li>• Easy access to services</li> <li>• Active transportation and recreational offerings</li> <li>• Compatible nearby uses</li> <li>• Lower cost of construction</li> </ul>	<b>R=2</b> <b>E=2</b>	The subarea is adjacent to the North Plains Elementary School and residential uses to the east. Downtown North Plains is also in close proximity and multimodal transportation options are available via NW Commercial Street. For industrial uses, the area is accessible via the Highway 26/NW Dersham Rd interchange by way of NW Mountaindale Rd and NW Dersham Rd. Development in areas further north and west would be contingent upon development in the eastern portions.
		<b>Environmental</b>	<ul style="list-style-type: none"> <li>• No presence of Goal 5 resources</li> <li>• Low hazard risks</li> </ul>	<b>R=2</b> <b>E=2</b>	The West Subarea contains a small amount of wetlands in its eastern portion. EastFork Dairy Creek runs along the western portion of the subarea. There are no steep slopes or floodplain concerns.
		<b>Energy</b>	<ul style="list-style-type: none"> <li>• Opportunities to reduce VMT of development</li> <li>• Opportunities for alternate modes of transportation</li> <li>• Presence of heating/cooling structures</li> </ul>	<b>R=1</b> <b>E=2</b>	There is potential for multimodal transportation options in the subarea and industrial development could create job opportunities for North Plains residents, decreasing VMT. Development in areas further north and west would be contingent upon development in the eastern portions. Current agricultural uses mean the subarea does not have an extensive existing tree canopy.
<b>Summary</b>					
Proximity of the Dersham Rd interchange to the West Subarea is conducive to industrial development. There is also convenient access from the eastern portions of the subarea to downtown North Plains via NW Commercial Street. Opportunities for multimodal facilities and conditions conducive to industrial development could decrease commute time for residents.					

Table 33: Factor 3 East Subarea Summary and Evaluation

EAST SUBAREA		Evaluation Criteria		Evaluation Results	
Description and Illustration		Evaluation Criteria	Metrics	Score	Comments
<p>The East Subarea is broken up into two portions. The larger portion is bounded by NW West Union Road (north), new residential development and Atfalati Ridge Elementary School (north), US 26 (south) and NW Jackson School Road (east). The smaller portion of the East Subarea is bounded by the railroad (north), industrial land uses adjacent to NW 298th Place (west), NW Jackson School Road (east) and NW West Union Road (south).</p>					
<p><b>North</b> Total: 397 acres Constrained: 15 acres</p> <p><b>West</b> Total: 493 acres Constrained: 9 acres</p> <p><b>South A</b> Total: 114 acres Constrained: 0 acres</p> <p><b>South B</b> Total: 38 acres Constrained: 0 acres</p> <p><b>East</b> Total: 515 acres Constrained: 71 acres</p> <p>Legend:          - North Plains UGB (Blue outline)          - City Limits (Dashed line)          - UGB Subareas (Black outline)          - Constraints* (Cross-hatch pattern)          *Open Water, Floodplain, Steep Slopes          - Subarea North (Red)          - Subarea East (Yellow)          - Subarea West (Blue)          - Subarea South A (Green)          - Subarea South B (Light Green)</p> <p>Scale: 0, 1,000, 2,000, 4,000 US Feet / 0, 0.25, 0.5, 1 Miles</p> <p>3J CONSULTING          Engineering   Community Planning   Public Management          UGB Expansion Areas          May 2022</p>		<b>Economic</b>	<ul style="list-style-type: none"> <li>• Low cost of land/transportation facilities/utilities/services</li> <li>• Variety of parcel sizes</li> <li>• High development potential</li> </ul>	<b>R=2</b> <b>E=2</b>	The East Subarea B is well-suited for development, with access to the Jackson School Road interchange with Highway 26 that provides visibility and regional mobility. The western portion of the subarea contains wetland and floodplain constraints, though a significant amount of developable land free of constraints remains. The western portion of the subarea adjacent to city limits also contains the Recology Organics, which is not currently suitable for redevelopment. The subarea abuts the new Sunset Ridge development, which is mainly residential, and Atfalati Ridge Elementary School, as well as industrial uses to the north across NW Union Rd.
		<b>Social</b>	<ul style="list-style-type: none"> <li>• Easy access to services</li> <li>• Active transportation and recreational offerings</li> <li>• Compatible nearby uses</li> <li>• Lower cost of construction</li> </ul>	<b>R=2</b> <b>E=2</b>	McKay Creek Corridor poses challenges to development, though a future east-west connection to downtown North Plains is planned and would potentially connect residential and employment uses. Access to Atfalati Ridge Elementary School, Sunset Ridge Park, and residential uses to the north The McKay Creek Trail System extension could be conducive to recreational activities, and the lands surrounding McKay Creek are likely to develop as park land.
		<b>Environmental</b>	<ul style="list-style-type: none"> <li>• No presence of Goal 5 resources</li> <li>• Low hazard risks</li> </ul>	<b>R=1</b> <b>E=1</b>	The majority of the subarea is free of environmental constraints. There are some 25% slope areas in the western portion of the subarea, and the McKay Creek Corridor poses flooding hazards. An identified FEMA 100-Year Floodplain also follows the McKay Creek in this area.
		<b>Energy</b>	<ul style="list-style-type: none"> <li>• Opportunities to reduce VMT of development</li> <li>• Opportunities for alternate modes of transportation</li> <li>• Presence of heating/cooling structures</li> </ul>	<b>R=1</b> <b>E=1</b>	The East Subarea is connected to surrounding areas via local connectors such as NW Union Rd, and the Highway 26/Jackson School Rd interchange. VMT reduction is possible as residents, students, and visitors can easily access Atfalati Ridge Elementary School, Sunset Ridge Park, and potential future employment centers. The McKay Creek Corridor does pose a challenge to east-west connectivity. Tree canopy exists in the western portion, but the remaining area is currently used for agricultural purposes, and therefore, does not have an existing tree canopy.
<b>Summary</b>					
The East Subarea is well-suited to future development. There is good access to the adjacent Sunset Ridge development, Atfalati Ridge Elementary, and several parks, and a connection to downtown is planned. The McKay Creek Trail System extension could increase access to recreational activities, which has positive community health benefits. Highway 26/Jackson School Rd interchange and active transportation options via West Union Rd could decrease VMT.					

#### 4. COMPATABILITY OF THE PROPOSED URBAN USES WITH NEARBY AGRICULTURAL AND FOREST ACTIVITIES ON FARM AND FOREST LAND OUTSIDE THE UGB

As part of the Goal 14 Location Factor analysis, the City researched the adjacent agricultural and forest uses per subarea. The agricultural and forest uses were determined via data from USDA CropScape (Figure 12), Google Earth, and Washington County land use datasets. This compatibility analysis was conducted to identify the potential conflicts between current agricultural uses and proposed uses for each subarea. Criteria were established to consider how specific agricultural uses, such as livestock or poultry processing operations, may interact with proposed development. A dairy operation, for example, has the potential for year-round continuous and daily operations, which could result in complaints from nearby residential uses about noise, odor, hours of operation, and create pet and livestock conflicts. New residents may complain about increased traffic, spray drift, or specific farming practices. Urbanizing an area could also have negative implications for agricultural uses and could increase the risk of trespassing, litter, or vandalism. The agricultural and forest compatibility analysis is an additional guide for decision makers in determining the best area(s) for UGB expansion.

The following criteria were used to determine potential levels of conflict between each subarea and adjacent agricultural or forest uses, as shown in Table 34. The subareas with the least potential conflict with surrounding agricultural and forest uses scored a 2-low potential conflict. The majority of subareas scored a 1-moderate potential conflict. There were no subareas that ranked 0-high potential conflict.

0-high potential conflict	Intensive livestock or poultry processing operations, feedlots, dairies, etc.	Potential for year-round continuous/ongoing, or daily conflicts and impacts; potential for pet and livestock interaction and conflict; potential for trespass/litter/nuisance/vandalism; potential for complaints about noise, odor, hours of operation.
1-moderate potential conflict	Commodity crops, row crops, orchards, vineyards, hay, grass seed	Potential for seasonal conflicts and impacts, potential seasonal beehives; potential for complaints about noise, odor, spray drift, hours of operation, burning; potential for trespass/litter/nuisance/vandalism
2- low potential conflict	Woodlots, pasture, grazing, passive management uses	Potential for infrequent conflicts or no significant continuous impacts, may be multi-year cycle for harvest for certain uses, or routine harvest of only a portion of the resource (woodlot, etc.). Routine resource management activities may also be low impact. Potential for trespass/litter/nuisance/vandalism; potential for complaints about certain resource management and harvest operations.



Figure 12. USDA CropScape Map of Surrounding Agricultural Uses:

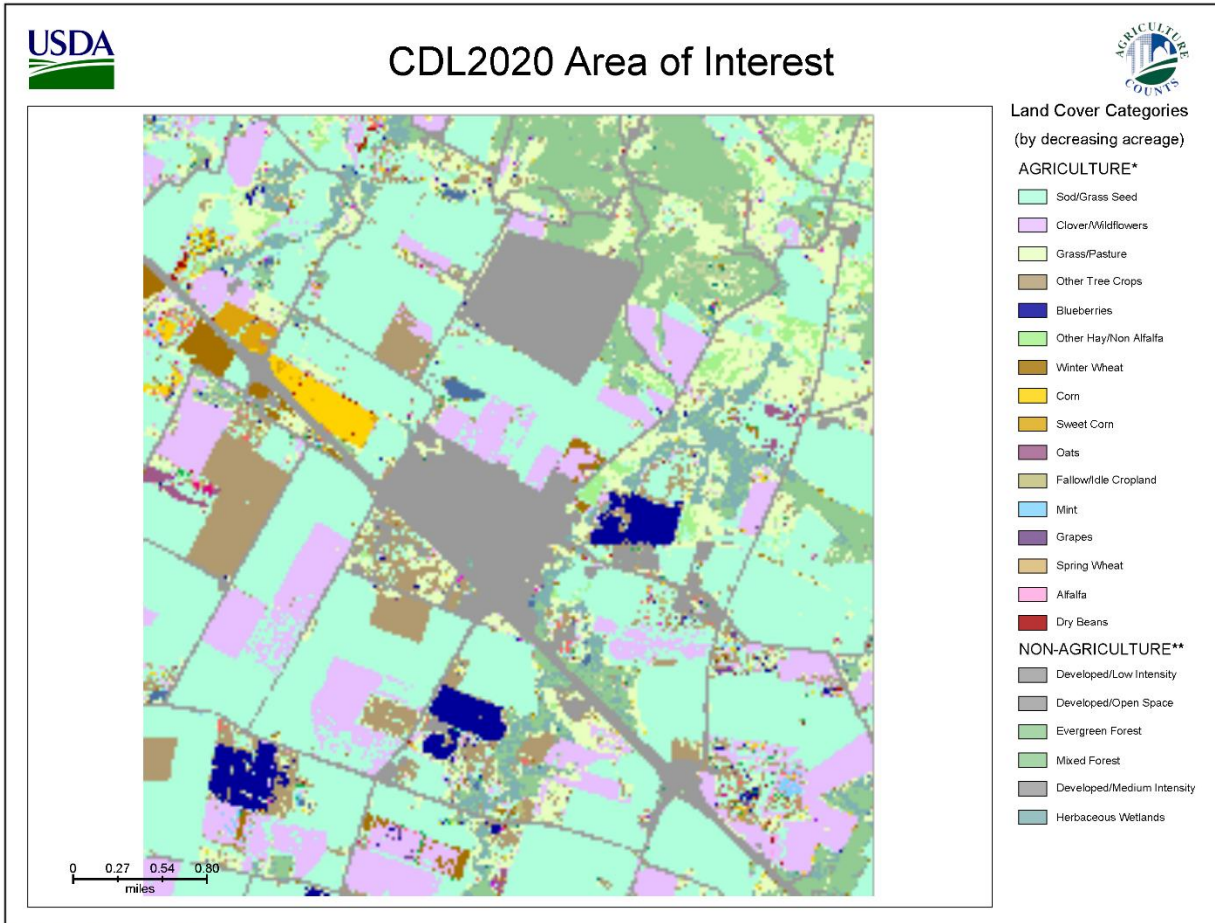


Table 34: Agricultural and Forestry Compatibility Analysis

Agricultural and Forestry Compatibility Analysis		Evaluation Criteria		Evaluation Results		
Description and Illustration		Evaluation Criteria	Ideal Definition	Score	Comments	
<p><b>North</b> Total: 397 acres Constrained: 15 acres</p> <p><b>West</b> Total: 493 acres Constrained: 9 acres</p> <p><b>South A</b> Total: 114 acres Constrained: 0 acres</p> <p><b>South B</b> Total: 38 acres Constrained: 0 acres</p> <p><b>East</b> Total: 515 acres Constrained: 71 acres</p> <p>Legend:          North Plains UGB (Blue outline)          City Limits (Black outline)          UGB Subareas (White outline)          Constraints* (Cross-hatch pattern)          *Open Water, Floodplain, Steep Slopes</p> <p>Subarea North (Red)          Subarea East (Yellow)          Subarea West (Blue)          Subarea South A (Green)          Subarea South B (Light Green)</p> <p>3J CONSULTING          May 2022</p> <p>Scale: 0 to 4,000 US Feet / 0 to 1 Miles</p>		<p><b>Potential conflict with adjacent farm and forest uses.</b></p> <p>Potential for infrequent conflicts or no significant continuous impacts, may be multi-year cycle for harvest for certain uses, or routine harvest of only a portion of the resource (woodlot, etc.). Routine resource management activities may also be low impact. Potential for trespass/litter/nuisance/vandalism; potential for complaints about certain resource management and harvest operations.</p>				
					<b>+2</b>	Zoned EFU, AF-20 and AF-5, the <b>North Subarea</b> is adjacent to predominantly sod/grass seed farming, clover/wildflower farming, tree crops, and grass/pasture; Pumpkin Ridge Golf Course to the north of the subarea
					<b>+1</b>	Zoned EFU and R-IND, <b>South Subarea A</b> is adjacent to urbanized North Plains to the north; and predominantly sod/grass seed, clover/wildflower, tree crops, and corn to the south and west. Pacific Fiber Products operates a wood chip and trucking business northwest of the subarea.
					<b>+1</b>	Zoned EFU, AF-5, and R-COM, <b>South Subarea B</b> is adjacent to urbanized North Plains to the north, commercial uses and grass/pasture to the west, and predominantly pasture/grass, sod/grass seed, wildflower/clover farming to the south and east. Blueberry farming is present to the southeast of the subarea.
					<b>+1</b>	Zoned EFU and R-IND, the <b>West Subarea</b> is adjacent to urbanized North Plains to the east, predominantly clover/wildflower farming, sweet corn, and pasture/grass to the west, predominantly winter wheat, sod/grass seed and farming, and a variety of fruits/vegetable farming to the southwest. Pacific Fiber Products operates wood chip and trucking business to the south of the subarea.
				<b>+1</b>	Zoned EFU and AF-20, the <b>East Subarea</b> is predominantly adjacent to clover/wildflower farming, sod/grass seed farming, tree crops, and grass/pasture. Other adjacent agricultural uses include blueberry farming, fruit/vegetable farming, and other hay/non alfalfa agricultural uses. A turkey and vegetable farm and Christmas Tree farm are found further east. A vineyard, and horse stables further south of Highway 26.	
<p><b>Summary</b></p> <p>Adjacent to urbanized North Plains and the Pumpkin Ridge Golf Course, the North Subarea is best-suited for UGB expansion relative to adjacent agriculture and forest uses. All other subareas are also well-suited with moderate potential for conflict.</p>						

## 5. Evaluate Urbanization Potential

This chapter details the steps taken to analyze the North Plains UGB Expansion Study Area:

- Evaluate/Revise Comprehensive Plan Policies
- Examine Efficiency Measures in Existing UGB
- Develop Urbanization/Serviceability Analysis
- Finalize Expansion Recommendation

### Evaluate/Revise Comprehensive Plan Policies

The North Plains Comprehensive Plan was last updated in 2019 subsequent to approval of the 2017 Housing Needs Analysis (HNA) and 2018 Economic Opportunities Analysis (EOA). All policies were reviewed and approved by the North Plains Planning Commission and City Council at that time. The recent City Council Vision and adopted 2022 EOA resulted in significant changes to cities policy direction for economic development that are reflected in amendments that were made to the Comprehensive Plan. The 2022 HNA Update did not result in a significant change in population projection or housing needs, therefore the policies contained in the 2019 Comprehensive Plan are current. No other changes to the Comprehensive Plan are required at this time, though Comprehensive Plan policies will be reviewed again as part of the Concept Plan process for the UGB expansion area, expected to begin in Fall 2023.

### Examine Efficiency Measures in Existing UGB

As stated in Chapter 2, prior to pursuing a UGB expansion, the City must demonstrate that identified land needs cannot reasonably be accommodated on land already inside the UGB. The City is required to evaluate opportunities to provide efficient development of residential land within the existing UGB.

The City evaluated possible land use efficiency measures and determined which would result in a meaningful change in the land development pattern in North Plains. Efficiency measures adopted in 2022 include:

- Prohibit new single-family detached housing in the R-2.5 zoning district.
- Allow outright duplexes, triplexes and townhouses in the R-5 zoning district.
- Add cottage cluster standards and permit this housing type outright in the R-2.5 zoning district.
- Set minimum density at 70% of maximum density in all residential zoning districts.
- Allow density bonus for affordable housing in the R-2.5 zoning district.

### Develop Urbanization/Serviceability Analysis

An analysis of urbanization/serviceability was included in Chapter 4 relative to transportation, water, sanitary sewer, and stormwater services. The information provided in the analysis was used by the

Project Advisory Committee, Planning Commission, and City Council when making their final UGB Expansion Recommendation.

### Finalize Expansion Recommendation

Once the Goal 14 Location Factor Analysis was complete, the PAC used that information to deliberate various options for the direction of the UGB Expansion over the course of three meetings. At PAC meeting #6 on August 4, 2022, the PAC discussed possible 40-year growth scenarios that envisioned the best location for various land uses when the City is full built out. At meeting #7 on February 2, 2023, the PAC discussed a Proposed UGB Expansion that was based on the previous meetings discussion. Three variations of the Proposed UGB Expansion were created for PAC discussion at meeting #8 on February 28, 2023. Ultimately, the PAC decided to recommend Scenario 2 (Figures 13 and 14) for Planning Commission consideration. The final location of specific land uses will be determined through the Concept Plan process. The distribution of land in the various subareas to meet the 855.2-acre land need is shown in Table 35.

Table 35. Recommended UGB Expansion by Subarea

<b>Subarea</b>	<b>Buildable Acres</b>
North	90.1
South B	34.0
West	319.1
East	412.0
<b>Total</b>	<b>855.2</b>

The 34 buildable acres in South Subarea B was the first priority as it is exception land and must be considered first. In line with the City Council vision, the next top priority was the majority (412 acres) of the East Subarea since the land is most development-ready. This does not include eastern-most 64 acres of the East Subarea as that area is already fully-occupied by the operations for Recology, a waste management and resource recovery company. The third priority was the 90.1 acres in the North Subarea, which is the location envisioned for a large community park. The remaining 319.1 acres was allocated to the West Subarea as it is the least development ready, with an emphasis on the southern portion of that Subarea.

The PAC recommendation was not unanimous. Two PAC members were concerned about the traffic that would be generated by growth in the North Subarea and would like to see a different configuration in that Subarea that completes the road network of the Sunset Ridge Subdivision. One PAC member would like to see more residential uses in the East Subarea and less in the North Subarea.

Figure 13. Proposed North Plains UGB Expansion Proposed by Project Advisory Committee with Land Uses

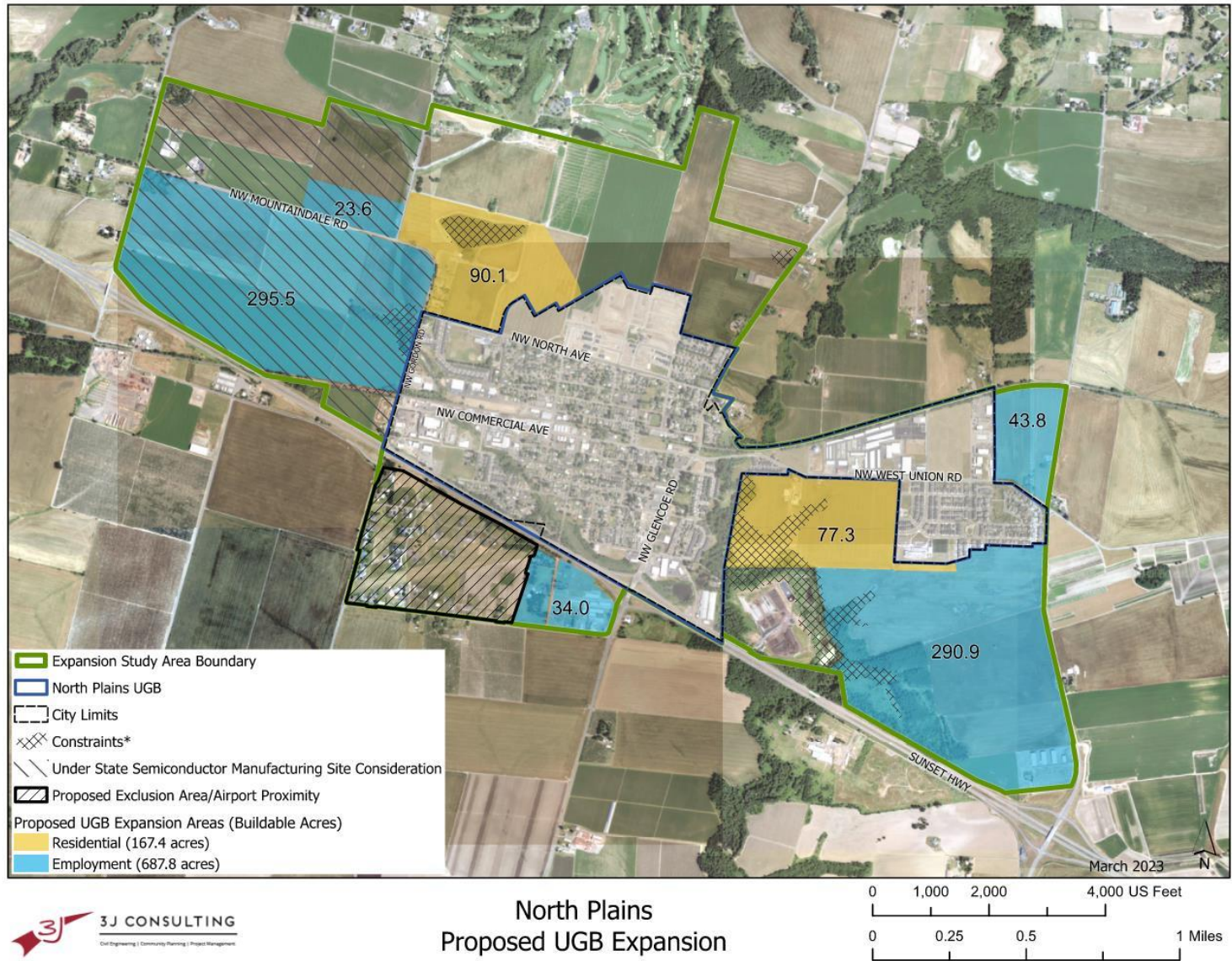
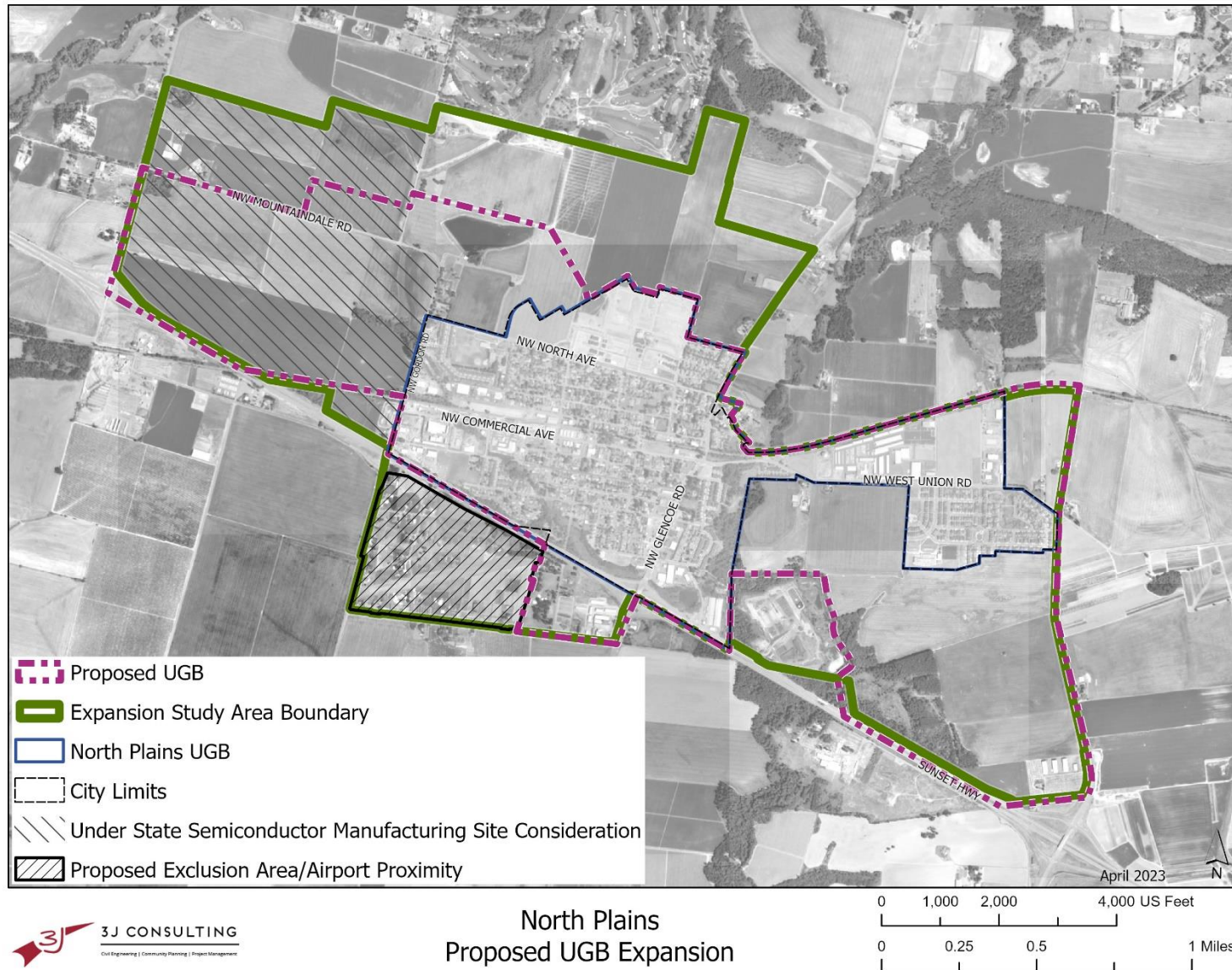


Figure 14. Proposed North Plains UGB Expansion Proposed by Project Advisory Committee



## 6. Review and Acknowledgement

The City of North Plains must complete the following steps to complete the North Plains UGB Expansion process:

- Receive City and County Approval
- Submit Post-Acknowledgement Plan Amendment (PAPA) to DLCD
- Submit Final Ordinance and Record to DLCD (for review in manner of periodic review)
- Await Conclusion of 21-day Period for Participant Filing of Objections
- Review Director Decision Including Consideration of Objections (if any) (within 120 days from date the department receives a complete submittal)
- Participate in LCDC Meeting to Acknowledge Expansion (if DLCD Director Forwards the Application to LCDC)

The City has scheduled a series of meetings for the Planning Commission and City Council to finalize and approve the Proposed UGB Expansion:

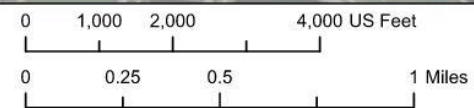
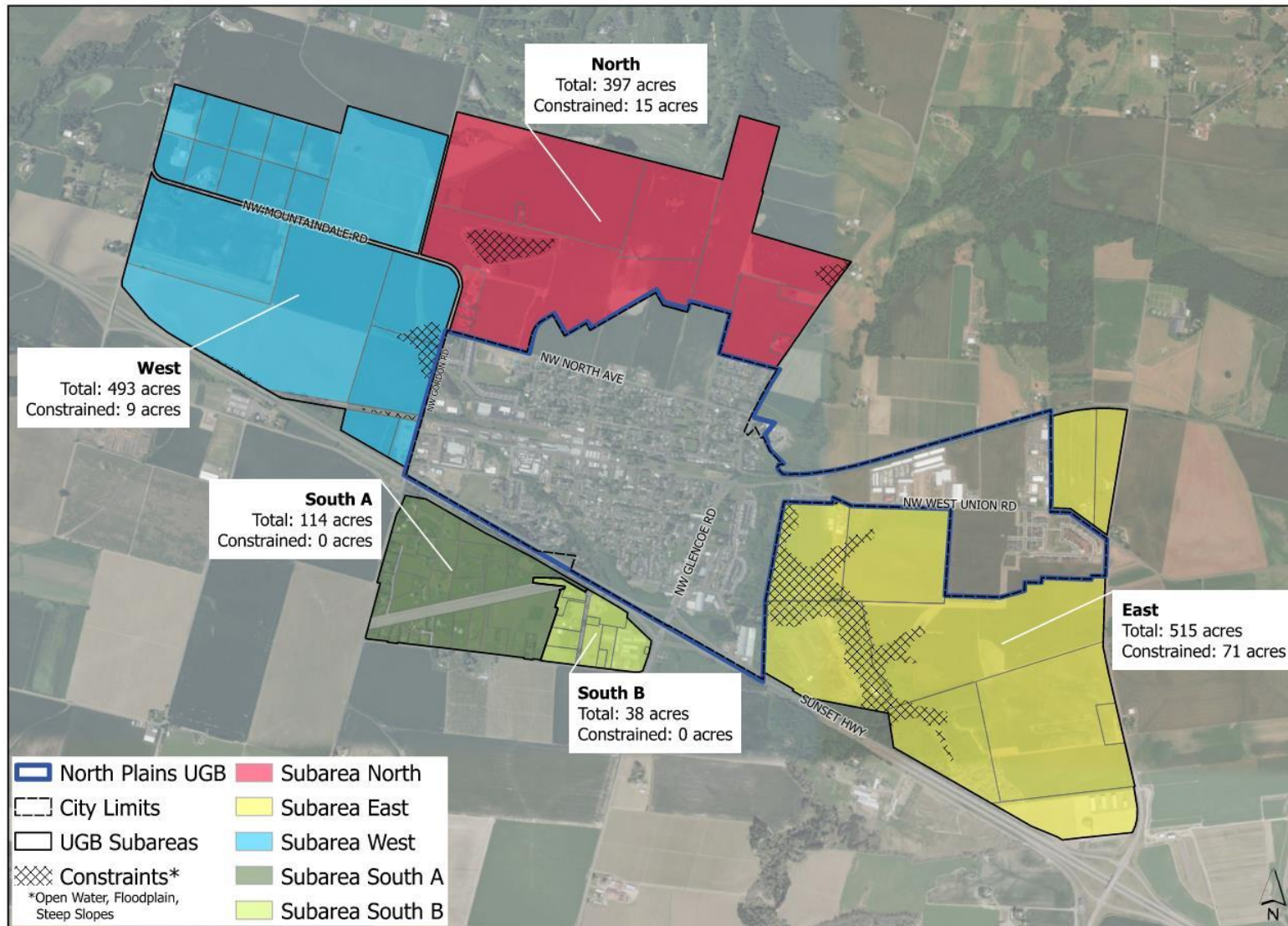
- April 16 Joint Planning Commission and City Council Work Session
- May 10 Planning Commission Hearing
- June 5 City Council Hearing

A PAPA notice was submitted to DLCD along with this report on April 5, 2023. Following adoption of the UGB Expansion by City Council, the City will work with Washington County to approve the UGB Expansion before completing the final steps in the process with DLCD and the Land Conservation and Development Commission.

## Appendix A. South Subarea A Exclusion

In determining the preliminary study area of the UGB Expansion project, the City of North Plains has determined that certain properties, identified on Figure A-1 as “South Subarea A”, meet the criteria for exclusion from the UGB study area. South Subarea A, as well as South Subarea B, are considered “Exception Lands” and are therefore considered high priority when the city is conducting the UGB expansion boundary analysis. The City acknowledges the Exception Land designation and therefore does not propose exclusion of the entire South Subarea from the UGB study area. Documentation of compliance with the applicable criteria for exclusion for South Subarea A are detailed in this appendix.





**OAR 660-024-0065 Establishment of Study Area to Evaluate Land for Inclusion in the UGB**

*Applicable subsections of OAR 660-024-0065:*

*(4) The city may exclude land from the preliminary study area if it determines that:*

*(a) Based on the standards in section (7) of this rule, it is impracticable to provide necessary public facilities or services to the land;*

*(7) For purposes of subsection (4)(a), the city may consider it impracticable to provide necessary public facilities or services to the following lands:*

*(b) Land that is isolated from existing service networks by physical, topographic, or other impediments to service provision such that it is impracticable to provide necessary facilities or services to the land within the planning period. The city's determination shall be based on an evaluation of:*

*(A) The likely amount of development that could occur on the land within the planning period;*

*(B) The likely cost of facilities and services; and*

*(C) Any substantial evidence collected by or presented to the city regarding how similarly situated land in the region has, or has not, developed over time.*

*(c) As used in this section, "impediments to service provision" may include but are not limited to:*

*(A) Major rivers or other water bodies that would require new bridge crossings to serve planned urban development;*

*(B) Topographic features such as canyons or ridges with slopes exceeding 40 percent and vertical relief of greater than 80 feet;*

*(C) Freeways, rail lines, or other restricted access corridors that would require new grade separated crossings to serve planned urban development;*

*(D) Significant scenic, natural, cultural or recreational resources on an acknowledged plan inventory and subject to protection measures under the plan or implementing regulations, or on a published state or federal inventory, that would prohibit or substantially impede the placement or construction of necessary public facilities and services.*

**FINDINGS regarding OAR 660-024-0065:**

Subsection (7)(b)(A), above, identifies "the likely amount of development that could occur on the land within the planning period" as a reason to exclude certain lands from the UGB study area. The properties proposed for exclusion from the preliminary study area, South Subarea A, are developed primarily with single-family homes, the majority of which have airplane hangars and access to the airfield. There are certain amounts of land and access needed by these lots to allow maneuvering of private aircraft between the individual lots and the airfield.

Significant redevelopment of this area to accommodate residential or employment needs for the City of North Plains would impact the use and practicality of the airstrip. The airstrip is shared by 33 property owners (many of whom own plane hangars abutting the airfield.) The airport is licensed by the state, and subject to deed restrictions governing its use and maintenance. Abandoning the

airport requires a majority vote of the property owners, and a vote may not occur more than once every 10 years. The current property owners within the air-acre subdivision at issue have expressed their desire to maintain use of the airfield. In addition to the airstrip, the private streets in this area are an impediment to infill or redevelopment of this area, as access is severely limited to the majority of the area. Due to the presence of the airstrip and the private streets, the lots proposed for exclusion are unlikely to redevelop within the 20-year planning period of the UGB expansion, allowing the City to consider it impracticable to provide necessary public facilities or services to these lots based on Subsection (7)(b)(A), above.

Subsection (7)(b)(B), above, identifies “the likely cost of facilities and services” as a reason to exclude certain lands. The area proposed for exclusion is developed with residential properties and, as such, if included in the UGB Expansion Area, would be included for residential development. The small number of residential units that could redevelop within the area proposed for exclusion would require extensive facilities and services, with an extremely high utility cost per residential dwelling unit, making provision of such impracticable to provide, satisfying the provisions of Subsection (7)(b)(B), above.

Subsection (7)(b)(C), above, identifies “any substantial evidence collected by or presented to the city regarding how similarly situated land in the region has, or has not, developed over time” as a reason to exclude certain lands from the UGB study area. The City has collected evidence that the presence of the airport has an impact on the residential designation of any surrounding lands and would result in conflicts between homeowners and airport operations. Noise, vibration, overflights and other issues arise between airports and their residential neighbors. The city of Portland has faced constant issues of takings because of the residential designations placed around the Portland International Airport and has been required to place an overlay zone on lands surrounding that airport to require those residential uses to include noise insulation to prevent further nuisance suits against both the city and the Port of Portland.

In addition, the problematic land economics matters described above, which are unlikely to result in development of South Subarea A in the 20-year planning period, have played out elsewhere in the region, including at the former Exception Land Area in the nearby Hillsboro Industrial Area along both sides of NW Sewell Road between NW Evergreen and NW Meek Road that contains approximately 530 acres of land occupied by a long-established rural residential community which were added to the Metro UGB in 2005. Land redevelopment impediments such as significantly-higher rural residential land values than industrial land values (which persists even more in 2021 due to limited residential land supply), and land assembly and acquisition difficulties due to many owners of strategically-located rural properties needed for industrial developments – and for new supporting urban infrastructure - unwilling to sell their properties to interested industrial developments (which further exacerbated already then-existing high costs of infrastructure provision) have precluded urban infill development ever since the Area was added to the UGB in 2005.

The substantial evidence of residential development near airport facilities and land economics that the City has collected satisfies the provisions of Subsection (7)(b)(C), above.

Subsection (7)(c), above, identifies some of the “impediments to service provision” that may be used to determine exclusion of certain areas in the UGB study area. Specifically, subsection (C) identifies “freeways, rail lines, or other restricted access corridors that would require new grade separated crossings to serve planned urban development” as impediments. The airport itself serves as an “other restricted access corridor” that would limit the provision of transportation and utility services within South Subarea A. In addition, NW Redhaven Street and NW 236<sup>th</sup> Place are private streets and an eastern extension of NW Beach Court is precluded by a 1’x50’ Tract (see ‘Tract A’ on Air Acres No. 2 Plat, recorded May 3, 1972), further limiting the feasibility of providing transportation and utility services. These restricted access corridors within South Subarea A limit the inclusion of these properties in the UGB study area, meeting the provisions of Subsection (7)(c)(C), above.

### **State and County Airport Regulations**

#### *Applicable State Regulations*

*Oregon Revised Statutes (ORS) 836.600 to 836.630 deal with Local Government Airport Regulation. The policy of these statutes is “to encourage and support the continued operation and vitality of Oregon’s airports.” ORS 836.608(1) declares continued operation and vitality of airports as a matter of state concern.*

*ORS 836.608(2) states that a local government shall recognize in its planning documents the location of private-use airports and establish a boundary showing areas in airport ownership, or subject to long-term lease, that are developed or committed to airport uses. Areas committed to airport uses shall include those areas identified by the airport owner that the local government determines can be reasonably expected to be devoted to airport uses allowed under 836.616(2). ORS 836.616(3)(a) goes on to say that “a local government shall not impose limitations on the continued operation of uses described in ORS 836.616(2) that existed at any time during 1996 at an airport described in subsection (2) of this section.*

*ORS 836.616(2) authorizes customary and usual aviation-related activities and uses within airport boundaries that include but are not limited to takeoffs, landings, aircraft hangars, tie-downs, construction and maintenance of airport facilities, fixed-based operator facilities and other activities incidental to the normal operation of an airport, and those aeronautic recreational and sporting activities that may occur on the airport site.*

#### *Applicable County Regulations*

*Policy 42 of the Washington County Comprehensive Framework Plan states that “It is the policy of Washington County to protect the function and economic viability of existing public use airports, while*

*ensuring public safety and compatibility between airport uses and surrounding land uses for public use airports and for private use airports identified by the Oregon Department of Aviation (DOA)."*

*"Policy 42 outlines implementing strategies which, in part, set forth Airport Overlay Districts to regulate safety concerns, land uses and land use compatibility issues on airport properties and within surrounding areas. These are structured to address state-recognized airports in two categories, generally referred to herein as Public Use Airports and Private Use Airports."*

*Policy 42, Implementing Strategy 'a' states that the County will "Adopt and implement Airport Overlay Districts consistent with LCDDC Airport Planning Rules and ORS Chapter 836 in order to... 2. Protect privately owned, private use airports identified by the DOA. Each airport's specific level of risk and usage shall be used to guide the continued safe aeronautical access to and from these airports, considering the type of aircraft approved to use the field." Washington County Development Code, Article III, Sections 385-386 carry out implement state regulations and County policies.*

**FINDINGS regarding Airport Regulations:**

Roth Development is the owner of the Sunset Airstrip (airport code 1OR3) a private residential airpark located in Washington County, south of the City of North Plains and south of Highway 26. Roth Development's 33 shareholders are the owners of Air Acres, Air Acres 2, Sunset Orchard Estates 1 and Sunset Orchard Estates 2 (identified as "South Subarea A" in the UGB Expansion boundary analysis). The airstrip qualifies as an airport under Oregon Revised Statutes (ORS) 836.605(2) as it was the base for 25 aircraft on December 31, 1994 as shown on ODOT records.

The airport that exists in the exception area lies diagonally across 18 lots zoned Rural Residential-5. These homesites, landing strip, and associated aviation facilities comprise the Air Acres Subdivision. All of the lots are occupied and all the facilities are actively used. The Air Acres subdivision has existed on this site since before the area was zoned in the early 1970s and has had a licensed airport since 1970.

Urban development of the area surrounding the Sunset Airstrip would limit the normal operation of the airport in violation of state and county regulations. Air Acres is subject to deed restrictions governing its use and maintenance. Abandoning the airport requires a majority vote of the property owners, and a vote may not occur more than once every 10 years. The current property owners within the air-acre subdivision at issue have expressed their desire to maintain use of the airfield. Therefore, the City finds that the RR-5 and AF-5 land near the airport cannot reasonably accommodate the City's residential or employment land need.

Due to the orientation of this airstrip, development of the area with additional dwellings would necessitate abandoning the facility, which is shared by 33 property owners, many who own plane hangers abutting the airfield. The continuing operation of the Sunset Airstrip is a significant impediment to development at urban intensities. As stated previously regarding land economics,

residential development would be the appropriate use for inclusion of South Subarea A in the UGB study area; however, infill residential development is extremely unlikely to occur during the planning period as the property owners intend to continue to operate the airport and additional development would impact its operations.

### **North Plains Comprehensive Plan**

As this land is developed residentially, any future UGB expansion into South Subarea A would be for residential uses. Therefore, the policies identified from the North Plains Comprehensive Plan address Statewide Planning Goal 10: Housing.

#### *Goal 10: Housing*

*Objective 4: To require that land that is brought into the UGB primarily to meet residential land needs is concept planned before it is annexed into the city limits, and master planned before development is allowed.*

*Policy 3): Newly developed residential areas will be in master planned areas that may include parks, schools, public services and facilities, shopping, services, and activity centers, providing pedestrian access to these amenities.*

*Policy 4): Newly developed residential areas will include landscaping and open space to provide an amenity to the residential development and reduce potential conflicts with surrounding uses.*

### **FINDINGS regarding North Plains Comprehensive Plan:**

A new residential development in South Subarea A would not have sufficient land to include parks, schools, shopping, services, and activity centers with pedestrian access.

A new residential development in South Subarea A would not be able to provide sufficient open space to reduce conflicts with the Sunset Airstrip. The presence of the airport has an impact on the residential designation of any surrounding lands and would result in conflicts between homeowners and airport operations. Noise, vibration, overflights and other issues arise between airports and their residential neighbors. Redevelopment of these properties with additional residential dwelling units would not meet the identified provisions of the North Plains Comprehensive Plan.

### **North Plains Transportation System Plan**

*1. Objective: To create a multi-modal transportation system for all users. All users will have safe and convenient access.*

*Policy 1.D): Provide complete access for pedestrians and bicycles to key locations.*

*5. Objective: To encourage design and improvements that reduce the environmental impact of the transportation system.*

*Policy 5.A): Reduce emissions by encouraging connectivity and design that reduces vehicle miles traveled.*

### **FINDINGS regarding North Plains Transportation System Plan:**

Complete access for pedestrians and bicycles to key locations within the City of North Plains is extremely limited from this location. Residents of new housing units in South Subarea A would not have safe and convenient access to key locations for pedestrians and bicycles. New residential development or redevelopment in South Subarea A would not encourage connectivity to reduce vehicle miles traveled as the airport limits connectivity and the existing roadway network is comprised of privately owned streets and tracts. Development of new residential units in this area would not meet the applicable objectives of the Transportation System Plan.

### **RESULTS OF EXCLUSION ANALYSIS**

The City of North Plains finds that the South Subarea A properties identified on the map at the beginning of this appendix meet the criteria for exclusion from the preliminary UGB study area. The properties identified for exclusion meet the applicable criteria of OAR 660-024-0065, as demonstrated within this appendix. Further evidence supporting exclusion of these properties from the preliminary study area are found in the findings related to the State and County Airport Regulations, North Plains Comprehensive Plan and North Plains Transportation System Plan.

The City acknowledges that South Subarea A is considered Exception Lands and is therefore compelled to consider these lands first for inclusion in the UGB; however, the City finds that urbanization of South Subarea A would be incompatible with the operation of the Air Acres airport and that South Subarea A is incapable of reasonably meeting any portion of the City's residential or employment land need over the 20-year planning horizon.