

UGB

BEFORE THE BOARD OF COUNTY COMMISSIONERS
FOR COLUMBIA COUNTY, OREGON

In the Matter of an Application by the City)
of Scappoose (PA 11-01) for a Major Map)
Amendment to Change 378 Acres of Rural)
Residential, Rural Industrial, Agriculture) / ORDINANCE NO. 2011-3
Resource and Community Service to Urban)
Growth Boundary (UGB))

The Board of County Commissioners for Columbia County, Oregon, ordains as follows:

SECTION 1. TITLE.

This Ordinance shall be known as Ordinance No. 2011-3.

SECTION 2. AUTHORITY.

This Ordinance is adopted pursuant to ORS 201.035, ORS 203.045, and ORS 197.175.

SECTION 3. PURPOSE.

The purpose of this Ordinance is to approve application PA 11-01 for a Comprehensive Plan Map Amendment to expand the City of Scappoose Urban Growth Boundary (UGB) by approximately 378 acres. Specifically, this Ordinance changes the Comprehensive Plan Map designation of properties identified in Exhibit A, attached hereto and incorporated herein by this reference, from Rural Residential, Rural Industrial, Agriculture Resource, and Community Service to UGB.

SECTION 4. HISTORY.

Public hearings on the application were held before the Columbia County Planning Commission (Planning Commission) on June 6, 2011, and the Board of County Commissioners (Board) on July 27, 2011. On July 27, 2011, the Board closed the hearing to oral testimony, but left the record open until August 3, 2011 for written evidence and testimony. However, to correct a scrivener's error in its public hearing notice, which was identified through public testimony at the July 27th hearing, the Board published a corrected notice in the *Spotlight* on August 10, 2011, and reopened the record for written evidence and testimony until August 17, 2011, and continued deliberations to August 31, 2011. On August 31, 2011, the Board deliberated and voted to tentatively approve the application.

SECTION 5. FINDINGS AND CONCLUSIONS.

Based on the record of written evidence and testimony before the Board, a list of which is attached hereto and incorporated herein as Exhibit B, and oral testimony presented at the public hearing on July 27, 2011, the Board of County Commissioners adopts the findings of facts and conclusions of law set forth in Exhibit C, attached hereto and incorporated herein by this reference. As more particularly described in the Board's findings in Exhibit B, the Board adopts portions of the City's findings in support of City Ordinance 816, except to the extent that the City's findings are inconsistent with the Board's findings. The City's findings in support of City Ordinance 816 are attached hereto as Exhibit D and incorporated herein by this reference.

SECTION 6. AMENDMENT AND AUTHORIZATION.

1. PA 11-01 is hereby approved, and the Columbia County Comprehensive Plan Map is hereby amended to change the designation of the properties identified in Exhibit A from Rural Residential, Rural Industrial, Agricultural Resource, and Community Service to Urban Growth Boundary.

2. As part of its approval of PA 11-01, the Board of County Commissioners hereby imposes the following conditions:

a. Any changes to the existing multi-use natural woodland environment of the Crown-Zellerbach Trail (between West Lane and Honeyman Roads) shall be approved by the County following the Memorandum of Understanding dated December 18, 1996; and

b. If the development of the 15-acre regional park's staging area impacts wetlands, all work within these wetlands shall be authorized and approved by the Oregon Department of State Lands; and

c. Prior to any development in the unincorporated areas, the County shall require Site Design Review(s) to address the traffic impact as well as provisions for water, sewer, and storm drainage facilities.

SECTION 9. SEVERABILITY.

If any portion of this Ordinance is for any reason held invalid by any court of competent jurisdiction, such portion shall be deemed as a separate, distinct, and independent portion, and such holdings shall not affect the validity of the remaining portion of this ordinance.

SECTION 10. SCRIVENER'S ERRORS.

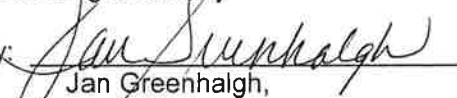
Any scrivener's errors in this Ordinance may be corrected by order of the Board of County Commissioners.

DATED this 26th day of October, 2011.

Approved as to Form

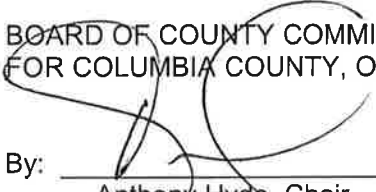
By: 
Office of County Counsel

Recording Secretary

By: 
Jan Greenhalgh,
Recording Secretary

First Reading: 10-12, 2011
Second Reading: 10-26, 2011
Effective Date: 1-24, 2012

BOARD OF COUNTY COMMISSIONERS
FOR COLUMBIA COUNTY, OREGON

By: 
Anthony Hyde, Chair

By: 
Earl Fisher, Commissioner

By: 
Henry Helmüller, Commissioner

Ordinance No. 816 Exhibit B

Real property added to the Scappoose Urban Growth Boundary (UGB)

Note: See Maps A, B, and C for the specific location of the UGB and comprehensive plan boundaries (UGB and plan designations may not align with parcel boundaries)

Northeast Expansion Area		
Columbia County Assessor Map and Tax Lot number	Area added to UGB (acres)	Comprehensive Plan Designation
3N1W 600 200	33.0	Airport Employment (AE)
3N1W 600 504	142.3	Airport Employment (AE)
3N1W 6B0 100	3.5	Airport Employment (AE)
3N1W 6B0 400	2.0	Airport Employment (AE)
3N1W 6B0 500	0.6	Airport Employment (AE)
3N1W 6B0 600	0.9	Airport Employment (AE)
3N1W 6B0 700	10.6	Airport Employment (AE)
3N1W 6B0 1300	2.0	Airport Employment (AE)
3N1W 6B0 1400	0.1	Airport Employment (AE)
3N1W 6B0 1500	3.2	Airport Employment (AE)
3N1W 6B0 1600	3.2	Airport Employment (AE)
3N1W 6B0 1700	3.2	Airport Employment (AE)
3N1W 6B0 1701	3.3	Airport Employment (AE)
3N1W 6B0 1800	8.1	Airport Employment (AE)
3N1W 6B0 1900	9.1	Airport Employment (AE)
3N1W 6B0 2000	1.0	Airport Employment (AE)
3N1W 6B0 ROAD	3.3	Airport Employment (AE)
3N1W 700 102	7.9	Airport Employment (AE)
3N1W 700 103	105.3	Airport Employment (AE)
Airport Employment Subtotal	342.6	
3N1W 700 103	14.5	Public Lands (PL)
Public Lands Subtotal	14.5	

Southwest Expansion Area		
Columbia County Assessor Map and Tax Lot number	Area added to UGB (acres)	Comprehensive Plan Designation
3N2W13C0 5900	0.3	Commercial (C)
3N2W13C0 ROAD	0.1	Commercial (C)
3N2W2400 300	0.1	Commercial (C)
3N2W2400 1404	2.6	Commercial (C)
3N2W2400 1407	2.5	Commercial (C)
3N2W2400 ROAD	1.4	Commercial (C)
3N2W2400 ROAD	4.0	Commercial (C)
3N2W24AC 600	0.3	Commercial (C)
3N2W24AC ROAD	1.3	Commercial (C)
Commercial Subtotal	12.7	
3N2W2400 300	2.0	Public Lands (PL)
3N2W2400 400	0.8	Public Lands (PL)
Public Lands Subtotal	2.8	

Gilmore Road Expansion Area		
Columbia County Assessor Map and Tax Lot number	Area added to UGB (acres)	Comprehensive Plan Designation
3N2W 100 300	2.6	Commercial (C)
3N2W 100 301	0.9	Commercial (C)
3N2W 100 302	1.2	Commercial (C)
3N2W 100 ROAD	0.1	Commercial (C)
3N2W 1C0 ROAD	0.1	Commercial (C)
Commercial Subtotal	5.0	

Grand total: 378 acres

EXHIBIT B

Written testimony and evidence admitted into the record by the Board of Commissioners:

EXHIBIT 1 - Legal Counsel's File:

1. Board Communication from Todd Dugdale, dated July 21, 2011, with the following attachments:
 - a. Board Staff Report, dated July 20, 2011, with the following attachments:
 - i Planning Commission Final Order, signed June 9, 2011
 - ii Draft minutes of June 6, 2011 Planning Commission Public Hearing
 - iii Application
 - iv Comments from Lonny Welter, Columbia County Transportation Planner, dated May 10, 2011
 - v Comments from Scappoose Bay Watershed Council, dated May 5, 2011
 - vi Comments from Scappoose CPAC, dated May 16, 2011
 - vii Comments from William and Brenda Strape, dated September 25, 2010
 - viii Comments from David Stocker, County Economic Development Coordinator, dated May 10, 2011
 - ix Comments from NRCS District Conservationist, dated September 3, 2010
 - x Comments from Jeff Bennett, City Attorney, City of Scappoose, submitted at Planning Commission hearing on June 6, 2011
 - xi Comments from Marie Gadotti, submitted at Planning Commission hearing on June 6, 2011
2. Notice of Public Hearing (Publication), dated July 1, 2011
3. Notice of Public Hearing (Property Owner Notice), dated July 1, 2011
4. Affidavit of Publication, dated July 1, 2011
5. Affidavit of Mailing, dated July 1, 2011
6. Certificate of Mailing Final Order, dated June 13, 2011
7. Planning Commission Staff Report, dated May 27, 2011
8. Notice of Public Hearing, dated April 26, 2011; certificate of mailing, dated April 26, 2011; and affidavits of publication (*The Spotlight* and *The Chronicle*), dated May 25, 2011
9. Letter of complete application from Glen Higgins, Columbia County Planning Manager, dated April 25, 2011
10. Letter from Brian Varrichione, Scappoose City Planner, dated April 20, 2011, with revised application and attachments
11. Notice to DLCD
12. Letter from Glen Higgins, Columbia County Planning Manager, dated December 29, 2010
13. Notice of Public Hearing continuation from Glen Higgins, Columbia County Planning Manager, dated September 22, 2010, and certificate of mailing, dated September 22, 2010
14. Letter from Brian Varricchione, Scappoose City Planner, requesting continuance, dated September 21, 2010
15. Letter from Seth Brumley, ODOT, dated September 21, 2010

16. Scappoose UGB article published in The Chronicle on September 15, 2010
17. Comments from Scappoose CPAC, dated September 15, 2010
18. Letter from Seth Brumley, ODOT, dated September 9, 2010
19. Appendix 7 to application (containing public comments), submitted on September 2, 2010
20. Comments from Lonny Welter, Columbia County Transportation Planner, dated August 26, 2010
21. Certificate of Mailing, dated August 26, 2010
22. Notice of Planning Commission Public Hearing, dated August 25, 2010
23. Letter from Glen Higgins, Columbia County Planning Manager, dated August 24, 2010
24. DLCD notice
25. Application, submitted July 29, 2010

EXHIBIT 2: Written testimony from Scappoose Mayor Scott Burge

EXHIBIT 3: Scappoose Resolution No. 11-15, submitted by Mayor Scott Burge at Board of Commissioners' hearing on July 27, 2011

EXHIBIT 4: Letter from David Stocker, Columbia County Economic Team, dated July 25, 2011

EXHIBIT 5: Written testimony from Marie Gadotti, dated July 27, 2011

EXHIBIT 6: Written testimony from Michael Sheehan, dated July 27, 2011

EXHIBIT 7: Written testimony from Patricia Zimmerman, dated July 27, 2011

EXHIBIT 8: Written testimony from 1000 Friends of Oregon, dated July 27, 2011; Metro Reports submitted by 1000 Friends of Oregon on July 27, 2011: 20 and 50 year Regional Population and Employment Range Forecasts, dated September 2009; and Urban Growth Report 2009-2030 Employment and Residential, dated January 2010

EXHIBIT 9: Letter from Ed Freeman, Airpark Development, LLC, dated August 1, 2011

EXHIBIT 10: Letter from Brian Rosenthal, dated August 3, 2011

EXHIBIT 11: Written testimony and evidence from Marie Gadotti, dated August 3, 2011

EXHIBIT 12: Written evidence submitted by Michael Sheehan on August 17, 2011

EXHIBIT 13: Written testimony and evidence from Jerald Johnson, Johnson Reid, dated August 16, 2011

EXHIBIT C

COLUMBIA COUNTY BOARD OF COMMISSIONERS
FINDINGS OF FACT
Columbia County Comprehensive Plan Map Amendment
City of Scappoose UGB Expansion

HEARING DATE: July 27, 2011

FILE NUMBER: PA 11-01

APPLICANT: City of Scappoose
33568 E. Columbia Avenue
Scappoose, OR 97056

OWNER: Various property owners in Sections 13 and 24 in
Township 3 North Range 2 West and in Sections 1, 6
and 7 in Township 3 North Range 1 West

TAX LOTS: 29 tax lots, identified in Exhibit C

PROPERTY LOCATION: 357 Acres in the NE Expansion Area
16 Acres in the SW Expansion Area
5 Acres in the NW Gilmore Road Expansion Area

REQUEST: A post acknowledgment plan amendment (PAPA) to
expand the City of Scappoose's Urban Growth
Boundary (UGB) by approximately 378 acres. This
request will amend portions of the County's
Comprehensive Plan Map Designation from Rural
Residential, Rural Industrial, Agriculture Resource,
and Community Service to the City of Scappoose's
Urban Growth Boundary (UGB).

PRESENT COMPREHENSIVE
PLAN DESIGNATION: Rural Residential, Rural Industrial, Agriculture
Resource, and Community Service

PROPOSED COMPREHENSIVE
PLAN DESIGNATION: Urban Growth Boundary (UGB)

PRESENT ZONING: RR-5, RIPD, PA-80, and CS-1.

PROPOSED ZONING: The city has not proposed any other interim zoning
on the affected properties

APPLICABLE REVIEW CRITERIA:

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BACKGROUND & SUMMARY:

The City of Scappoose proposes a County Comprehensive Plan Map Amendment, File No. PA 11-01, for approximately 378 acres of land from Agriculture Resource, Rural Industrial, Rural Residential, and Community Service to Urban Growth Boundary (UGB) as shown below in Table 1 and Map C on Page 5. This amendment is based on an Economic Opportunities Analysis, is consistent with Statewide Planning Goal 9 as balanced with Goal 14, and is needed for the City of Scappoose to have an adequate land supply to accommodate its projected employment growth over the next 20 years, until 2030.

TABLE 1 - UGB EXPANSION ACREAGE AND LAND USE SUMMARY

Location	Existing Zoning	Proposed Plan Designation (after annexation)	Gross Acres Added to UGB
Northeast Expansion Area	PA-80	Airport Employment (including 20 acres for Institutional Use)	266
	PA-80	Public Lands (for a regional park)	15
	RIPD	Airport Employment	61
	RR-5	Airport Employment	16
Southwest Expansion Area	RR-5	Commercial	13
	CS-I	Public Lands (no changes to existing Fairview Cemetery)	3
Northwest Gilmore Road Expansion	RR-5	Commercial	3
	RIPD	Commercial	1
	EC	Commercial	1
Total		All Land Uses	378**

* The gross acreage figure includes: (a) suitable employment land; (b) unsuitable wetlands and floodplain; (c) existing & future public lands and (d) land for existing and planned street rights-of-way.

**Due to rounding, the total acreage in the table equals 379 acres. However, according to the more precise numbers in Exhibit B of City Ordinance No. 816, the total expansion area equals 378 acres.

Proposed amendments to Urban Growth Boundaries are required to comply with Division

24 of Oregon Administrative Rules Chapter 660 as well as with provisions in Oregon Revised Statute 197.298 relating to the selection and suitability of the unincorporated land included in this UGB expansion. According to the submitted application, the City of Scappoose's proposed UGB expansion is needed to meet their projected 20 Year Employment Need for industrial and commercial development. This 20 Year Employment Need was determined according to Statewide Planning Goal 9 that authorizes cities to review and, if necessary, amend their comprehensive plans if a factually based Economic Opportunities Analysis indicates the existing land supply cannot accommodate the city's economic development goals and opportunities.

With this objective, approximately three years ago on July 7, 2008 the City of Scappoose established an Ad Hoc Economic Opportunity Analysis Advisory Committee that would review and evaluate an Economic Opportunities Analysis prepared by Johnson Reid LLC. This Ad Hoc Advisory Committee and Johnson Reid reviewed the existing supply of industrial and commercial zoned land and compared this supply to the City's 20 Year projected demand for these same land needs. This extensive analysis resulted in the attached application's *January 10, 2011 City of Scappoose's Economic Opportunities Analysis (EOA)* that is provided for in OAR 660-009-0015.

The submitted proposal, based on the *January 2011 EOA* (Attachment A) recommends the City (1) expand the city's UGB by approximately 378 acres in three areas (SW Expansion Area, NE Expansion Area and Gilmore Road Expansion Area) to accommodate its 20 year industrial and commercial needs and establish a new 15 acre regional park and (2) amend and update the City's Comprehensive Plan Goals and Policies and the related Development Code provisions as needed to implement these identified economic opportunities. Columbia County needs to review and evaluate only the proposed UGB Amendment to the county's Comprehensive Plan Map and not the accompanying City's implementing ordinances.

After the required City of Scappoose Planning Commission and City Council public hearings held between September 2010 and April 2011, on April 18, 2011 the Scappoose City Council approved the approximate 378-acre expansion of the UGB and the related City's Comprehensive Plan & Development Code amendments through the adoption of Ordinance 816. Since the state requires UGB amendments to be adopted by both the City and the County, the City submitted PA 11-01 to Land Development Services on April 20, 2011 and requests the county's concurrence.

With this background information, the remainder of this report will research, analyze and evaluate the extent to which the proposed expansion of the City of Scappoose's Urban Growth Boundary complies with the applicable regulatory provisions of the State of Oregon's Administrative Rules, Revised Statutes, and Statewide Planning Goals related to Urbanization and Economic Development as well as with the applicable provisions of the County Comprehensive Plan and Zoning Ordinance.

Beginning with the Columbia County Zoning Ordinance:

Section 1502 Zone Changes (Map Amendments)

There are two types of zone changes which will be considered by the Commission: Major

Map Amendments and Minor Map Amendments.

.1 Major Map Amendments are defined as Zone Changes which require the Comprehensive Plan Map to be amended in order to allow the proposed Zone Change to conform with the Comprehensive Plan. The approval of this type of Zone Change is a 2 step process:

A. The Commission shall hold a hearing on the proposed Zone Change, either concurrently or following a hearing, on the proposed amendment to the Comprehensive Plan which is necessary to allow the proposed zoning to conform with the Comprehensive Plan. The Commission may recommend approval of a Major Map Amendment to the Board of Commissioners provided they find adequate evidence has been presented at the hearing substantiating the following:

1. The proposed Zone Change is consistent with the policies of the Comprehensive Plan;
2. The proposed Zone Change is consistent with the Statewide Planning Goals (ORS 197); and
3. The property and affected area is presently provided with adequate facilities, services, and transportation networks to support the use, or such facilities, services and transportation networks are planned to be provided concurrently with the development of the property.

B. Final approval of a Major Map Amendment may be given by the Board of Commissioners. The Commissioners shall hold a hearing on the proposed Zone Change either concurrently or following a hearing on the proposed Comprehensive Plan Amendment which is necessary to allow the proposed zoning to conform with the Comprehensive Plan. The Board may approve a Major Map Amendment provided they find adequate evidence has been presented substantiating the following:

1. The proposed Zone Change is consistent with the policies of the Comprehensive Plan;
2. The proposed Zone Change is consistent with the Statewide Planning Goals (ORS 197); and
3. The property and affected area is presently provided with adequate facilities, services, and transportation networks to support the use, or such facilities, services and transportation networks are planned to be provided concurrently with the development of the property.

Finding 1: The applicant is requesting approval of a Major Map Amendment application which will, if approved, change the County Comprehensive Plan Map from Rural

Residential, Rural Industrial, Agriculture Resource, and Community Service to Urban Growth Boundary (UGB) for the affected properties. Since this proposed UGB expansion is required for the City to fulfill their long term (20 year) Employment Land Need provided for in OAR 660-024-0040(5), the County will not apply any interim zoning to the affected properties. Lands will not be rezoned until they are annexed to the City.

Columbia County will process the proposed UGB expansion as a Major Map Amendment because the request will require the official Comprehensive Plan Map be amended to reflect the proposed new UGB. The Planning Commission heard the matter at their June 6, 2011 meeting and voted to recommend approval of the proposed UGB expansion. The Board reviewed the application, heard testimony and considered written evidence at a July 27, 2011 hearing, held the record open through August 24, and continued deliberations to August 31, 2011, at which time the Board of Commissioners made a preliminary decision to approve the application, subject to approval of findings and adoption of an ordinance approving the application and amending the Comprehensive Plan Map as requested.

Consistency with the policies of the Comprehensive Plan and the Oregon Statewide Planning Goals are reviewed throughout these findings. The goals and policies of the County Comprehensive Plan are addressed in Findings 32 through 48.

Since the City's request does not include any rezoning of the affected properties, these newly designated urbanizable properties will retain their current zoning until future annexation. Nevertheless, the Board finds that upon annexation, the City of Scappoose will need to have the required master plan(s) in place to ensure adequate facilities and services will be extended to the affected site(s) at the time of development to allow the intended commercial and industrial uses as well as the intended public land uses in areas for this proposed UGB Expansion. No new development of the subject properties are proposed with this UGB Expansion. Accordingly, the Board concludes that this criterion has been satisfied.

Continuing with Columbia County Zoning Ordinance:

Section 1605 Zone Change - Major Map Amendment:

The hearing for a major map amendment shall follow the procedure established in Sections 1502, 1502.1, 1502.1A and 1502.1B. This hearing cannot result in the approval of a major map amendment. The Commission may make a recommendation to the Board of Commissioners that such a zone change be granted. Approval by the majority of the Commission is necessary in order to make recommendation to the Board of Commissioners. The Board of Commissioners hearing on the proposed zone change - major map amendment will be on the record unless a majority of the Board votes to allow the admission of new evidence.

Finding 2: The hearing for this Major Map Amendment followed the previously mentioned procedures. The Planning Commission held their public hearing on June 6, 2011 and made their recommendation to the Board of Commissioners. The Board of Commissioners held a hearing on July 27, 2011. On August 31, 2011, the Board held a public meeting to

deliberate and made a preliminary decision to approve the City's Comprehensive Plan Map amendment application allowing the UGB expansion. The Board finds this criterion has been satisfied.

Continuing with Columbia County Zoning Ordinance:

Section 1606 Legislative Hearings:

Requests to amend the text of the Zoning Ordinance or to change a large area of the Zoning Map of Columbia County in order to bring it into compliance with the Comprehensive Plan are legislative hearings. Legislative hearings shall be conducted in accordance with the following procedures.

- .1 A legislative amendment to the Zoning Ordinance Text or Map may be initiated at the request of the Board of Commissioners, a majority of the Commission, or the Director, or any citizen of the County may petition the Commission for such a change.
- .2 Notice of a Legislative Hearing shall be published at least twice, one week apart in newspapers of general circulation in Columbia County. The last of these notices shall be published no less than 10 calendar days prior to the Legislative Hearing. The mailing of notice to individual property owners is not required but shall be done if ordered by the Board of Commissioners.

Finding 3: Although the City of Scappoose originally submitted the application for PA 11-01 on September 2, 2010, the City requested a continuance of the County Planning Commission hearing until after the City Planning Commission made its final recommendation to the City Council. On April 18, 2011 the Scappoose City Council adopted Ordinance 816 for the approximate 378-acre UGB expansion and the related amendments to the City's Comprehensive Plan and Development Code.

After adopting this ordinance, the city submitted the revised PA 11-01 application to the county on April 20, 2011. This revision included adding three tax lots in the Gilmore Road Expansion Area and subtracted all properties west of Old Portland Road in the SW Expansion area. The revised application was deemed complete on April 25, 2011 and scheduled to be heard at the Planning Commission's June 6, 2011 meeting. The Planning Director initiated this amendment to the Comprehensive Plan Map through the application. The 45-day notice was also mailed to the Department of Land Conservation and Development (DLCD) on April 26, 2011. Notice of this application was mailed to the owners of the affected subject properties on April 26, 2011. Columbia County sent notice of the application and its scheduled public hearing was published in the *Spotlight, Chronicle, and Daily News* on May 25, 2011, at least 10 calendar days prior to the June 6, 2011 public hearing date. Notification of the July 27, 2011 Board Hearing date was published in the *Spotlight* on July 6, 2011 and July 13, 2011. Likewise, notification of said hearing was mailed to surrounding property owners on July 1, 2011, with amended notice holding the record open mailed on August 4, 2011. Public notification procedures as outlined by Section 1606 for Legislative Hearings were followed for this proposal and public hearing procedures will be followed in accordance with this Section. Based on the foregoing, the Board finds that these criteria have been met.

Continuing with Columbia County Zoning Ordinance:

Section 1607 Consistency with the Comprehensive Plan:

All amendments to the Zoning Ordinance Text and Map shall be consistent with the Comprehensive Plan Text and Maps.

- .1 The Commission shall hold a hearing to consider the proposed amendments and shall make a recommendation to the Board of Commissioners with regard to the proposed amendments. The Board of Commissioners shall hold at least one hearing to consider the proposed amendments. Both the Commission and the Board of Commissioners hearings will require notice in the manner outlined in Section 1611.

Finding 4: The applicant proposes to amend the County Comprehensive Plan Map's designation of the affected sites to UGB, which will allow these sites to be annexed into the City of Scappoose for future industrial and commercial development. No interim changes to the Zoning Ordinance text or map will occur prior to the affected sites' future annexation. Notice of the Planning Commission hearing followed the procedures set forth in Sections 1606 and 1611 of the County's Zoning Ordinance. Notice of the Board of Commissioners hearing also followed the procedures of Section 1611. Both the Planning Commission and the Board of Commissioners held public hearings on the application. Based on the foregoing, the Board concludes that this criterion has been satisfied.

Continuing with Columbia County Zoning Ordinance:

Section 1611 Notice of Legislative Hearings:

The notice of a legislative hearing shall contain the following items:

- .1 Date, time and place of the hearing;
- .2 A description of the area to be rezoned or the changes to the text;
- .3 Copies of the statement for the proposed changes are available in the Planning Department. These proposed changes may be amended at the public hearing;
- .4 Interested parties may appear and be heard;
- .5 Hearings will be held in accordance with the provisions of the Zoning Ordinance.

Finding 5: Notice of the County's Planning Commission's public hearing was published in the *Spotlight*, *Chronicle*, and *Daily News* on April 25, 2011 and contained all information required by Section 1611 of the Columbia County Zoning Ordinance. Notice of the Board

of Commissioners' public hearing was published in the *Spotlight* on July 6, 2011 and July 13, 2011 and also contained all information required by Section 1611 of the County's Zoning Ordinance. At its July 27, 2011 hearing, the Board of Commissioners gave notice of that the record would remain open for 7 days and the Board would resume deliberations on August 17, 2011. On August 4, the Board published notice that the record would be held open through August 24 and the deliberations continued to August 31, 2011 (this action was taken to correct scrivener's errors in prior notices). Based on the foregoing, the Board concludes that this criterion has been satisfied.

Beginning with the Oregon Administrative Rules Division 9 - Economic Development:
660-009-0015 Economic Opportunities Analysis

Cities and counties must review and, as necessary, amend their comprehensive plans to provide economic opportunities analyses containing the information described in sections (1) to (4) of this rule. This analysis will compare the demand for land for industrial and other employment uses to the existing supply of such land.

(1) Review of National, State, Regional, County and Local Trends. The economic opportunities analysis must identify the major categories of industrial or other employment uses that could reasonably be expected to locate or expand in the planning area based on information about national, state, regional, county or local trends. This review of trends is the principal basis for estimating future industrial and other employment uses as described in section (4) of this rule. A use or category of use could reasonably be expected to expand or locate in the planning area if the area possesses the appropriate locational factors for the use or category of use. Cities and counties are strongly encouraged to analyze trends and establish employment projections in a geographic area larger than the planning area and to determine the percentage of employment growth reasonably expected to be captured for the planning area based on the assessment of community economic development potential pursuant to section (4) of this rule.

Discussion: As discussed during the Background & Summary section, the City of Scappoose utilized a methodology and guidelines consistent with State Planning Goal 9 to review and evaluate the existing Comprehensive Plan's Economic Goals, Policies, and Land Needs related to the city's Employment Needs/Opportunities in 2030. The Attachments, Maps and seven (7) Appendices submitted with PA 11-01 detail the various categories of this economic and land use analysis. However, the Executive Summary on Pages 2-4 of the *January 10, 2011 Scappoose EOA* summarizes its Key Findings related to the national, regional and local trends as follows:

1. Even though the report was conducted during a time of a severe national recession, the depth of the downturn is relative to other modern downturns. This can distort recent economic trends and make it difficult to forecast the nature and timing of the eventual recovery.
2. Beyond the near-term, the national economy is expected to return to a more typical growth rate, averaging 3.1% annual Gross Domestic Product growth from 2011 to

2019, as well as return to more typical levels of employment growth. In the coming growth cycle, the national commitment to renewable energy transition is expected to play a major role.

3. The most prominent industry clusters in Scappoose currently are the Aviation Manufacturing and Services, Retail and Nursery industries. Scappoose's projected 2030 employment forecast anticipates an increase of 8,068 jobs (7.6% AAGR). Professional & Business Services, Other Services, Manufacturing, and Retail Trade, are expected to account for approximately 67% of net new growth. An additional 25% of net new growth is anticipated in the Transportation, Warehousing & Utilities, Education & Health and Leisure & Hospitality sectors.
4. Scappoose's growth potential is based on several factors. First, the City has maintained exceptional growth during the last six years and although some of that growth has eroded recently, the area has held up well. Despite a nationwide severe recession, Columbia County has maintained a 1.6% growth rate between 2007 and 2008.
5. There will be a projected need for approximately 400 net acres to accommodate the 2030 projected employment growth. After accommodating infrastructure (streets, utilities etc.) and other site improvements, this translates to a need for 483 gross acres to accommodate the 2030 projected employment growth.
6. Provides on Page 4 a detailed assessment of Scappoose's projected 2030 employment land and site sizes requirements for Office, Commercial Retail, Industrial, Lodging Related and Public Land uses. These projections estimate a need for 53 sites and 483 gross acres to accommodate these future uses. A more detailed discussion of this employment land need will follow in Finding 6.

During the public hearings, the public expressed their concern about the average annual employment growth rate of 7.6% and the 8,068 more jobs projected to locate in Scappoose. On March 21, 2011 and August 16, 2011 Johnson Reid submitted letters (Appendix 7.B of City's Application, and Board Record #Exhibit 13) that address and clarify these concerns. In this letters, Johnson Reid states these projections are defensible in light of Scappoose's close proximity to the Portland - Vancouver Principal Metropolitan Statistical Area (PMSA). Specifically, this larger PMSA is projected to add approximately 500,000 jobs by 2030 and Scappoose's 8,068 would represent a 1.7% share of this regional growth. The letters also state that Metro anticipates over 25% (125,000) of the 500,000 new jobs will need to locate outside of its UGB primarily in the satellite communities of Scappoose, North Plains, Canby and Newberg. This projected 20 year employment forecast takes into account Scappoose's current and prospective role within the broader Metro UGB region and may be aspirational, but is not unreasonable. The August 16 letter observes that growth rates in small healthy communities are commonly larger than those for larger communities such as those cited by 1000 Friends of Oregon. The reason is that each new unit of growth in small community has a greater marginal impact than growth in a large community. So, in a community such as Scappoose, a relatively small addition of employment will result in a large growth rate (e.g., the addition of

just significant employers in communities like The Dalles and Morrow County had a large and immediate impact on their growth rates). Finally, these letters state that providing these additional economic opportunities would

help Scappoose to transition from a "bedroom community" to a more self-sufficient employment center that would serve city as well as county residents and increase revenues countywide.

Finding 6: For these reasons, the Board finds the *January 2011 Scappoose EOA's* identification of the major categories employment uses that could reasonably be expected to locate or expand within their UGB through 2030 has satisfied the criterion in OAR 660-009-0015(1).

Continuing with OAR 660-009-0015:

(2) Identification of Required Site Types. The economic opportunities analysis must identify the number of sites by type reasonably expected to be needed to accommodate the expected employment growth based on the site characteristics typical of expected uses. Cities and counties are encouraged to examine existing firms in the planning area to identify the types of sites that may be needed for expansion. Industrial or other employment uses with compatible site characteristics may be grouped together into common site categories.

Discussion: The Scappoose EOA analyzed national and local economic trends to identify employment and industrial uses that could reasonably be expected to locate in Scappoose. The following **Chart 1 - Land Demand by Site Size** appears on Page 37 of the *Scappoose EOA*, and identifies Scappoose's projected land demand in 2030. This Table illustrates two categories of Employment Land Demand: Employment Uses and Special Uses. For Employment Uses the City projects the need for fifty (50) Office, Commercial, Retail, Industrial and Lodging Related sites that can be accommodated on 373 acres of land. For Special Uses, the City projects the need for two (2) sites for the Scappoose Airport's hangar reserve and runway extension and one (1) site for a future extension of Portland Community College all of which can be accommodated on 110 acres. This data reveal Scappoose is projecting a need for approximately 400 net acres to accommodate this projected employment growth. After accommodating for infrastructure (streets, utilities, etc.) and other site improvements, this translates to a need for 483 gross acres.

Finding 7: For these reasons, the County finds the *Scappoose EOA* accurately identified the number of sites by type and size characteristics that can be reasonably expected to accommodate the City's projected 2030 employment growth satisfying the criterion in OAR 660-009-0015(2).

Land Demand by Site Size			
	Demand Projections		
	Typical Acreage	Sites	Gross Acres
Large	25.0	0	11.6
Medium	10.0	1	7.7
Small	5.0	9	45.1
SubTotal		10	64.4
Large	20.0	0	0.0
Medium	7.0	4	25.8
Small	1.0	6	6.3
SubTotal		10	32.1
Large	50.0	2	107.6
Medium	30.0	1	35.0
Small	7.0	7	51.1
Tech/Flex	12.0	2	21.5
Airpark Emp.	5.0	11	53.8
SubTotal		23	269.0
Lodging	1.5	2	3.0
Lodging-supportive commercial	1.0	5	4.5
SubTotal		7	7.5
Employment Uses Totals:		50	373.0
Special Uses			
Hangar Reserve		1	40.0
Runway Extension		1	50.0
PCC Campus		1	20.0
SubTotal		3	110.0
GRAND TOTALS:		53	483.0

Continuing with OAR 660-009-0015:

(3) Inventory of Industrial and Other Employment Lands. Comprehensive plans for all areas within urban growth boundaries must include an inventory of vacant and developed lands within the planning area designated for industrial or other employment use.

(a) For sites inventoried under this section, plans must provide the following information:

(A) The description, including site characteristics, of vacant or developed sites within each plan or zoning district;

(B) A description of any development constraints or infrastructure needs that affect the buildable area of sites in the inventory; and

(b) When comparing current land supply to the projected demand, cities and counties may inventory contiguous lots or parcels together that are within a discrete

plan or zoning district.

(c) Cities and counties that adopt objectives or policies providing for prime industrial land pursuant to OAR 660-009-0020(6) and 660-009-0025(8) must identify and inventory any vacant or developed prime industrial land according to section 3(a) of this rule.

(4) Assessment of Community Economic Development Potential. The economic opportunities analysis must estimate the types and amounts of industrial and other employment uses likely to occur in the planning area. The estimate must be based on information generated in response to sections (1) to (3) of this rule and must consider the planning area's economic advantages and disadvantages. Relevant economic advantages and disadvantages to be considered may include but are not limited to:

- (a) Location, size and buying power of markets;
- (b) Availability of transportation facilities for access and freight mobility;
- (c) Public facilities and public services;
- (d) Labor market factors;
- (e) Access to suppliers and utilities;
- (f) Necessary support services;
- (g) Limits on development due to federal and state environmental protection laws; and
- (h) Educational and technical training programs.

Discussion: Pertaining to OAR 660-009-0015(3), the city's Vacant and Redevelopable Land supply is summarized on Page 4 of Appendix 1.A. Appendix 1.A shows the city currently has 153 acres of industrial land and 31 acres of commercial land that are available for development since they are currently vacant or redevelopable and are topographically suitable for these uses. As shown in the City's adopted findings, the City also assumed 5 acres of intensification within the City's downtown area. By subtracting these 189 acres in the City's UGB from the 483 gross acres needed for the 2030 Employment Land Demand, demonstrates the City needs to expand their UGB by 294 acres. However, the City's request for PA 11-01 is for a 378-acre UGB Expansion which differs by 85 acres from their Employment Land Demand.

County Planning staff contacted the City of Scappoose via telephone on May 6, 2011 and the City Planner, Brian Varricchione explained this discrepancy. The additional 85 acres will not be used specifically for industrial or commercial development, but their inclusion will allow the City to preserve other public uses, preserve environmentally sensitive areas, and rectify the mapping errors in the Gilmore Road Expansion Area as follows:

- 5 acres of the Gilmore Road Expansion Area that was included to correct a map irregularity rather than to meet an employment need
- 3 acres for the existing Fairview Cemetery in the SW Expansion Area
- 15 acres for the proposed regional park south of the airport
- 20 acres of wetlands in the NE Expansion Area that will not be suitable for

- development,
- 10 acres of existing right-of-way in the SW and NE Expansion Areas, and
- 32 acres for future right-of-ways in the NE Expansion Area.

The assessment of Scappoose's economic and development potential on Pages 23 - 25 of the Scappoose EOA identifies two industry clusters that have been attracted to the City's UGB: Aviation Manufacturing and the Services and Retail Trade Sectors.

The Board notes and agrees with the City's findings regarding the suitability of Commercial Retail uses near the Airport (NE Expansion Area) and Highway 30 (in the SW and Gilmore Road Expansion Areas).

Pages 23 - 24 of the City Council Findings describe testimony concerning the unsuitability of certain types of Commercial Retail uses locating near the airport. Since the future Airport Business Park Overlay Zone will limit these uses to those between 5,000 to 20,000 square feet, the primary users of these services would be employees working in the airport-related office and light industrial uses nearby. These commercial uses do not require high-visibility and are not dependent on attracting drive-by customers.

The Council then considered where the City could locate Commercial Retail that needed higher visibility and also depended on the general public and/or drive-by customers for business. This public testimony and subsequent Council deliberations determined that these services should be located within (1) the SW Expansion Area between Highway 30 and Old Portland Road and south of the cemetery and (2) in the Gilmore Road Expansion Area where the eastern portions of all three affected properties were already within the UGB. More testimony from RR-5 property owners residing west of Old Portland Road (referred to on Page 29 of the City Council Findings) also resulted in the City's decision not to expand the UGB in these residentially developed areas which led to a 16-acre reduction in the commercial land need that could be accommodated in the SW Expansion Area.

Finding 8: With the Scappoose EOA's data related to the City's historical economic development patterns, economic trends and identification of needed site types, the testimony heard in the public hearings, and with the additional clarification from the City Planner regarding the UGB's need to accommodate other non-employment uses, the Board finds that the City has assessed and planned for its economic development potential and considered the related economic and political advantages and disadvantages, consistent with the requirements of OAR 660-009-0015(3 & 4).

Continuing with OAR 660-009-0015(5):

(5) Cities and counties are strongly encouraged to assess community economic development potential through a visioning or some other public input based process in conjunction with state agencies. Cities and counties are strongly encouraged to use the assessment of community economic development potential to form the community economic development objectives pursuant to OAR 660-009-0020(1)(a).

Discussion: The submitted request for PA 11-01 was the end result of an approximate 3 year collaboration between private citizens, public officials, private consultants, and elected officials who served on the Ad Hoc Economic Opportunities Advisory Committee, Johnson Reid LLC, the City of Scappoose's Planning Commission and City Council. The revisions included in the April 2011 application reflected the public's concerns about the increases in commercial uses in primarily RR-5 developed areas located west of Old Portland Road in the SW Expansion Area. The consequent revision relocated future commercial development away from these residentially developed properties and limited them to those areas east of Old Portland Road as well to the existing RR-5, EC, and RIPD 3 properties near Gilmore Road. In response to public testimony, the Planning Commission also recommended changes to the Airport Employment Overlay Zones to ensure that the land uses were appropriate for the airport area and would minimize conflicts with surrounding uses.

Finally, on May 10, 2011 LDS received comments from David Stocker the Columbia County Economic Development Coordinator stating the application provides adequate support in the Council's Findings and the submitted *Scappoose EOA*.

Finding 9: The Board finds the 378-acre UGB Expansion submitted in April 2011 for PA 11-01 was an approximately 3-year long collaborative process that appropriately responded to the public concerns, and is consistent with the required criteria in OAR 660-009-0015(4 & 5) for UGB Expansions that are needed to accommodate the City's Economic Development in its new urbanizable areas.

Continuing with the Oregon Administrative Rules Division 9 - Economic Development
660-009-0025 Designation of Lands for Industrial and Other Employment Uses

Cities and counties must adopt measures adequate to implement policies adopted pursuant to OAR 660-009-0020. Appropriate implementing measures include amendments to plan and zone map designations, land use regulations, public facility plans, and transportation system plans.

(1) Identification of Needed Sites. The plan must identify the approximate number, acreage and site characteristics of sites needed to accommodate industrial and other employment uses to implement plan policies. Plans do not need to provide a different type of site for each industrial or other employment use. Compatible uses with similar site characteristics may be combined into broad site categories. Several broad site categories will provide for industrial and other employment uses likely to occur in most planning areas. Cities and counties may also designate mixed-use zones to meet multiple needs in a given location.

Discussion: Pages 10 - 12 of the City of Scappoose Council Findings (in Exhibit A) include a Summary of the locational requirements that the city needs to accommodate the 2030's projected Industrial and Employment Uses. The City identified five categories of land need to accommodate those uses: (1) Commercial & Mixed Use for office; (2) Airport Related Uses for uses dependent on & supportive of airport uses; (3) Industrial Small site for most industrial uses; (4) Industrial Large site for industrial uses such as manufacturing

plants that require between 30 - 50 acres; and (5) Institutional Use for a potential Portland Community College facility. The City determined the amount of land needed for each category and after inventorying vacant & redevelopable land within the UGB, identified potential expansion acres that would meet the land need as shown in the following table.

TABLE 2 - CURRENT UGB'S ACCOMMODATION OF LAND USES

Use	Acreage Needed	Acres within UGB	Acreage Deficit amount of UGB Expansion
Commercial & Mixed Use	104	91	13
Airport Related employment	144	54	90
Industrial			
- Small Site typically 2-10-acre sites	85	44	41
- large Site typically 30 to 50-acre sites	130	0	130
Institutional	20	0	20
TOTAL	483	189	294

In addition to the locational requirements listed above, all future employment uses need the following site specific characteristics as supported by the data from the Oregon Business Development Department referenced on pp.48-59 of the EOA. The city states, and the Board agrees, that in order to be developed for their future uses, all sites must:

1. Consist of less than 10% slope and free of wetlands, floodplains, and riparian constraints;
2. Have direct access to Highway 30 without driving through established or planned residential areas;
3. Be large enough and appropriately shaped to accommodate larger on-site development and uses;
4. Be sufficiently buffered from nearby residential areas and cannot abut these areas on more than one side;
5. Be serviceable within the 5 - 10 years with adequate transportation, sanitary sewer, water electrical and storm drainage facilities; and
6. Have relatively poor agricultural soils and should have natural (riparian corridors) or artificial (roads and rural residential) boundaries from adjacent agricultural land.

Finding 10: Based on the foregoing data, the Board finds the City has identified the

approximate number, acreage and characteristics of sites that are needed to accommodate the 20 year projected industrial, commercial and institutional uses and has satisfied the criterion in OAR 660-009-0025(1).

Continuing with OAR 660-009-0025(2):

(2) Total Land Supply. Plans must designate serviceable land suitable to meet the site needs identified in section (1) of this rule. Except as provided for in section (5) of this rule, the total acreage of land designated must at least equal the total projected land needs for each industrial or other employment use category identified in the plan during the 20-year planning period.

Finding 11: As already discussed for Finding 7, the City's 2030 Employment Land Demand by Site Size analysis demonstrates a total of 53 sites and 483 acres are needed to meet the site requirements of targeted commercial, industrial, and institutional uses. A more detailed description of specific required site types is included in Pages 39 - 46 of the *Scappoose EOA* in Appendix A, and that description is incorporated herein as the Board's findings. The City has designated 189 acres within the existing UGB and 294 acres of expansion area to meet the identified need, and the Board finds the city has complied with this criterion.

Continuing with OAR 660-009-0025(3):

(3) Short-Term Supply of Land. Plans for cities and counties within a Metropolitan Planning Organization or cities and counties that adopt policies relating to the short-term supply of land must designate suitable land to respond to economic development opportunities as they arise. Cities and counties may maintain the short-term supply of land according to the strategies adopted pursuant to OAR 660-009-0020(2).

Finding 12: Although Scappoose is not located within Metro, on Page 12 of the City Council Findings, the City states that because employment land within Scappoose city limits (near the Scappoose Industrial Airpark and along Highway 30) is considered immediately serviceable and ready for development, more than half of the City's existing employment sites will remain available for the City's short-term employment opportunities. The Board adopts the City's findings addressing this criterion as its own and concludes that this criterion has been satisfied.

Continuing with OAR 660-009-0025(4):

(4) If cities and counties are required to prepare a public facility plan or transportation system plan by OAR chapter 660, division 011 or division 012, the city or county must complete subsections (a) to (c) of this section at the time of periodic review. Requirements of this rule apply only to city and county decisions made at the time of periodic review. Subsequent implementation of or amendments to the comprehensive plan or the public facility plan that change the supply of serviceable

land are not subject to the requirements of this section.

Finding 13: Per OAR 660-024-020 (1) (d) , the transportation planning rule requirements under OAR 660-012-0060 do not apply to PA 11-01 because all affected properties included in the 378 -acre UGB Expansion will not be rezoned for future commercial, industrial or institutional development until they are annexed. This PA 11-01 will only amend the Comprehensive Plan Map to UGB and will not, in and of itself, result in any additional commercial or industrial site development until the city prepares the required Public Facility and Transportation Systems Plan to support these properties' future development, annexes the property to the city and implements urban zoning which allows development of the property. The Board concludes that this criterion does not apply to PA 11-01.

Continuing with OAR 660-009-0025(5):

(5) Institutional Uses. Cities and counties are not required to designate institutional uses on privately owned land when implementing section (2) of this rule. Cities and counties may designate land in an industrial or other employment land category to compensate for any institutional land demand that is not designated under this section.

Finding 14: Appendix 5 of PA 11-01 identifies a 20-acre site that is large enough to support a future Portland Community College institutional use within the Scappoose Airport Land use Concept Plan. The exact location of this institutional use may change within this future Airport Employment (AE) zoned area. This criterion has been satisfied.

Continuing with OAR 660-009-0025(6):

(6) Compatibility. Cities and counties are strongly encouraged to manage encroachment and intrusion of uses incompatible with industrial and other employment uses. Strategies for managing encroachment and intrusion of incompatible uses include, but are not limited to, transition areas around uses having negative impacts on surrounding areas, design criteria, district designation, and limiting non-essential uses within districts.

Finding 15: Page 40 of the *Scappoose EOA* and Appendix 1.B specifically state land use compatibility (with adjacent land uses) is a required site characteristic for future commercial and industrial lands included in the UGB Expansion because:

1. All future employment site must have direct access to an existing or planned collector street without employees needing to drive through established or planned residential areas and
2. All employment locations cannot abut urban residential areas on more than one side and must include sufficient land and/or natural or artificial features to effectively buffer these potentially conflicting land uses from each other.

These provisions will also encourage the future clustering of all industrial uses which will, in turn, also minimize detrimental impacts to adjacent residentially developed properties.

The City, through public meetings and Planning Commission discussion, reallocated many of the proposed Commercial Retail uses away from both the airport and the RR-5 developed properties west of Old Portland Road (discussed in Finding 8), consistent with these compatibility requirements of future land uses.

With Development Code provisions for future industrial and commercial employment site development, the Board finds this criterion can be met before any properties are developed for their future commercial or industrial uses.

Continuing with OAR 660-009-0025(7):

(7) Availability. Cities and counties may consider land availability when designating the short-term supply of land. Available land is vacant or developed land likely to be on the market for sale or lease at prices consistent with the local real estate market. Methods for determining lack of availability include, but are not limited to:

(a) Bona fide offers for purchase or purchase options in excess of real market value have been rejected in the last 24 months;

(b) A site is listed for sale at more than 150 percent of real market values;

(c) the owner has not made timely response to inquiries from local or state economic development officials; or

(d) Sites in an industrial or other employment land category lack diversity of ownership within a planning area when a single owner or entity controls more than 51 percent of those sites.

Finding 16: Although the City did not specifically consider the short-term available (ready for construction within 1 year) supply of suitable and serviceable employment land, the Port of St. Helens, County Economic Development Coordinator and private landowners are actively marketing several parcels inside the UGB. Nevertheless, since this section is a suggestion for UGB Expansions rather than a requirement, the Board finds the proposed UGB Expansion is consistent with this suggestion of Goal 9's Statewide Planning Rule.

Continuing with OAR 660-009-0025(8):

(8) Uses with Special Siting Characteristics. Cities and counties that adopt objectives or policies providing for uses with special site needs must adopt policies and land use regulations providing for those special site needs. Special site needs include, but are not limited to large acreage sites, special site configurations, direct access to transportation facilities, prime industrial lands, sensitivity to adjacent land uses, or coastal shoreland sites designated as suited for water-dependent use under Goal 17. Policies and land use regulations for these uses must:

(a) Identify sites suitable for the proposed use;

(b) Protect sites suitable for the proposed use by limiting land divisions and permissible uses and activities that interfere with development of the site for the intended use; and

(c) Where necessary, protect a site for the intended use by including measures that either prevent or appropriately restrict incompatible uses on adjacent and nearby lands.

Finding 17: The Special Siting Characteristics of land the City will need to accommodate their 2030 Employment Needs were discussed for Finding 10. The discussion on Page 13 of the City Council Findings covers how the City's related Comprehensive Plan and Development Code Amendments will establish the Airport Employment (AE) Zone that will be implemented by the proposed Public Use Airport (PUA) Zone and three overlay zones: Airport Business Park (ABP), Airport Industrial Park (AIP) and East Airport Employment (EAE).

The City adopted these Comprehensive Plan and Development Code Amendments through Ordinance 816. LDS' staff overview of these amendments confirmed they are consistent with the requirements in OAR 660-009-0025(8) and provide various measures to preserve the continuance of these future authorized industrial and commercial uses. For these reasons, the Board finds the applicant has complied with this criterion for future authorized employment opportunities intended to occur within the affected portions of the 378-acre UGB Expansion.

Continuing with Statewide Planning Goals

GOAL14: URBANIZATION

Urban Growth Boundaries

Urban growth boundaries shall be established and maintained by cities, counties and regional governments to provide land for urban development needs and to identify and separate urban and urbanizable land from rural land. Establishment and change of urban growth boundaries shall be a cooperative process among cities, counties and, where applicable, regional governments. An urban growth boundary and amendments to the boundary shall be adopted by all cities within the boundary and by the county or counties within which the boundary is located, consistent with intergovernmental agreements, except for the Metro regional urban growth boundary established pursuant to ORS chapter 268, which shall be adopted or amended by the Metropolitan Service District.

Land Need

Establishment and change of urban growth boundaries shall be based on the following:

- (1) Demonstrated need to accommodate long range urban population, consistent with a 20-year population forecast coordinated with affected local governments; and

(2) Demonstrated need for housing, employment opportunities, livability or uses such as public facilities, streets and roads, schools, parks or open space, or any combination of the need categories in this subsection (2).

In determining need, local government may specify characteristics, such as parcel size, topography or proximity, necessary for land to be suitable for an identified need. Prior to expanding an urban growth boundary, local governments shall demonstrate that needs cannot be reasonably accommodated on land already inside the urban growth boundary.

Continuing with the Oregon Administrative Rules Division 24 - Urban Growth Boundaries:

660-024-0030 Population Forecasts

(1) Counties must adopt and maintain a coordinated 20-year population forecast for the county and for each urban area within the county consistent with statutory requirements for such forecasts under ORS 195.025 and 195.036. Cities must adopt a 20-year population forecast for the urban area consistent with the coordinated county forecast, except that a metropolitan service district must adopt and maintain a 20-year population forecast for the area within its jurisdiction. In adopting the coordinated forecast, local governments must follow applicable procedures and requirements in ORS 197.610 to 197.650 and must provide notice to all other local governments in the county. The adopted forecast must be included in the comprehensive plan or in a document referenced by the plan.

(2) The forecast must be developed using commonly accepted practices and standards for population forecasting used by professional practitioners in the field of demography or economics, and must be based on current, reliable and objective sources and verifiable factual information, such as the most recent long-range forecast for the county published by the Oregon Office of Economic Analysis (OEA). The forecast must take into account documented long-term demographic trends as well as recent events that have a reasonable likelihood of changing historical trends. The population forecast is an estimate which, although based on the best available information and methodology, should not be held to an unreasonably high level of precision.

Finding 18: Although this 378-acre UGB Expansion is needed for the City of Scappoose to be able to accommodate their projected 2030 Economic Development Need rather than in response to their 2030 Population Forecast, the city has adopted a Medium Growth Forecast determined by the *February 2008 Population Forecast for Columbia County*. This forecast was prepared by the Portland State University Research Center and is included in Attachment E. This Medium Growth Forecast projects Scappoose's population to increase from 6,601 in 2010 to 10,022 in 2030 which translates into a population increase of 3,421 people or an approximate 52% of its 2010 population. Undoubtedly, the 378-acre UGB Expansion will help the city to provide employment opportunities for existing residents to shift Scappoose away from its' "bedroom community" status, provide employment opportunities for new residents, increase the city's and county's revenue tax bases, and will encourage Scappoose and the southern portions of the county to become

more economically self-sufficient. Population forecast and job forecast does not have to be 1 to 1 ratio. A city can envision greater employment growth than population growth, especially if it is job deficient per population such as Scappoose. The Board finds the submitted 378-acre UGB Expansion is consistent with the City's projected Population Forecast for 2030.

Continuing with the Oregon Administrative Rules Division 24 - Urban Growth Boundaries
660-024-0040 Land Need

(3) A local government may review and amend the UGB in consideration of one category of land need (for example, housing need) without a simultaneous review and amendment in consideration of other categories of land need (for example, employment need).

Finding 18A: This urban growth boundary expansion is proposed to provide land for the 2030 Projected Employment Needs (airport-related industrial and commercial) determined by the final *January 10, 2011 City of Scappoose Economic Opportunities Analysis*. These 20-year land needs are also consistent with the City's 20-year population forecast discussed in Finding 18. The Board finds this criterion is met.

Continuing with OAR 660-024-0040(5):

(5) Except for a metropolitan service district described in ORS 197.015(13), the determination of 20-year employment land need for an urban area must comply with applicable requirements of Goal 9 and OAR chapter 660, division 9, and must include a determination of the need for a short-term supply of land for employment uses consistent with OAR 660-009-0025.

Finding 19: These Findings already have addressed the applicable requirements of OAR 660-009-0015 and 660-009-0025 during the Discussions related to Findings 6 - 17 and found the proposed 378-acre UGB Expansion will provide sufficient and suitable land to accommodate the City's 2030 Employment Need. The *Scappoose EOA* identifies a long-term employment need of approximately 400 suitable acres and an additional 90-acre need for airport related facilities such as potential airport runway extension and hangars. The proposed 378-acre UGB expansion will also help Scappoose to benefit from its proximity to the Portland metro area's supply of larger industrial properties that they project cannot accommodate this increase in demand. This expansion will also provide Scappoose with the opportunity to capture growth that cannot be accommodated in the nearby Metro region. For these reasons, the Board finds this criterion has been satisfied.

Continuing with the Oregon Administrative Rules Division 24 - Urban Growth Boundaries
660-024-0050 Land Inventory and Response to Deficiency

(1) When evaluating or amending a UGB, a local government must inventory land inside the UGB to determine whether there is adequate development capacity to accommodate 20-year needs determined in OAR 660-024-0040... For employment land, the inventory must include suitable vacant and developed land designated for industrial or other employment use, and must be conducted in accordance with OAR

Discussion: The 1/14/10 Memorandum from Winterbrook (Appendix 1.A & Map 4) titled **Vacant and Redevelopable Lands** provides the data and maps that identify the existing UGB's lands that are topographically suitable, vacant, and redevelopable for the targeted industrial and commercial uses. Tables 3 & 4 below summarize the City's existing land supply of industrial and commercial acreage and tax lots that are vacant and redevelopable.

OAR 660-009-0005(12) defines "Suitable" as serviceable land designated for industrial or other employment use that provides or, or can be expected to provide the appropriate site characteristics for the proposed use. OAR 660-009-005(14) defines "Vacant Land" as a) equal to or larger than one half-acre not currently containing permanent buildings or improvements; or (b) equal to or larger than five acres where less than one half-acre is occupied by permanent buildings or improvements.

Table 3: Industrial Vacant and Redevelopable Land Supply

Size	Number of Tax Lots	Total Topographically Suitable Acres
1 to 5 acres	3	9
5 to 20 acres	5	54
20 to 40 acres	1	30
40 + acres	1	60
TOTAL	10	153

Table 4: Commercial Vacant and Redevelopable Land Supply

Size	Number of Tax Lots	Total Topographically Suitable Acres
1 to 5 acres	15	14
5 to 20 acres	3	17
20 to 40 acres	0	0
40 + acres	0	0
TOTAL	18	31

Finding 20: The Board finds the City has properly inventoried its existing commercial and industrial land inside the existing UGB and properly determined through the *Scappoose* EOA that there is not adequate development capacity to accommodate the City's 20 year

Employment Land Need of 483 gross acres of such land. The *Scappoose EOA* correctly determined the existing UGB only has a total of 184 acres that are suitable for industrial and commercial development which is not sufficient to accommodate the City's 2030 Employment Need for this land. For these reasons, the Board finds this criterion has been met.

Subsection (2) does not apply to PA 11-01 because it applies only to UGB expansions needed to accommodate Housing needs. Likewise, Subsection (3) is Safe Harbors.

Continuing with OAR 660-024-0050(4)

(4) If the inventory demonstrates that the development capacity of land inside the UGB is inadequate to accommodate the estimated 20-year needs determined under OAR 660-024-0040, the local government must amend the plan to satisfy the need deficiency, either by increasing the development capacity of land already inside the city or by expanding the UGB, or both, and in accordance with ORS 197.296 where applicable. Prior to expanding the UGB, a local government must demonstrate that the estimated needs cannot reasonably be accommodated on land already inside the UGB. If the local government determines there is a need to expand the UGB, changes to the UGB must be determined by evaluating alternative boundary locations consistent with Goal 14 and OAR 660-024-0060.

Discussion: Pages 20 -24 of the submitted City Council Findings explains how the gross suitable acreage needs identified in the *Scappoose EO's* commercial retail, office, lodging, industrial and public uses will be accommodated on vacant and developable lands within and immediately adjacent to the existing UGB. The following Table summarizes this information:

Table 5: Total Unmet Employment Need = 294 Suitable Acres with required site characteristics

LAND USE	IDENTIFIED NEED	SUPPLY INSIDE UGB	REDESIGNATE TO MEET NEED INSIDE UGB	UNMET NEED
Office/Retail/Lodging	104 Acres	- 31 Acres commercial, - 5 Acres PUA, - 5 Acres Commercial Intensification	50 Acres for Airport Business Park	13 Acres Highway Commercial
Airport Related	144 Acres	0 Acres	54 Acres for Airport Industrial Park	50 Acres Runway Extension & 40 Acres

				Hangars
Industrial	215 Acres	44 Acres (after AIP rezoning)	0 Acres	171 Acres: Large Sites = 130 Acres (two @ 50 + one @ 30) 41 Acres for Small sites between 2 - 10 acres
Institutional	20 Acres	0 Acres	0 Acres	20 Acres (PCC)
TOTAL	483 Acres	85 Acres	104 Acres	294 Acres

Finding 21: Because the *Scappoose EOA* determined the development capacity inside Scappoose's existing UGB cannot accommodate the estimated 20 Year Employment Land Need by 294 Acres as shown in Table 5, the City has elected to meet this need deficiency by rezoning and intensifying approximately 104 acres of land within the UGB and expanding the UGB by 378 acres, 294 acres of which will be used for commercial, industrial, and institutional uses. An approximate 85 acres will be needed to accommodate other needs such as public uses, public facilities/ rights-of-way, and environmentally sensitive areas. The Board finds the *Scappoose EOA* has demonstrated that the development capacity of land inside the UGB is inadequate to accommodate the estimated 20-year Employment Need and has satisfied this portion of OAR 660-024-0050(4). The Alternative Boundary Location and Goal 14 criteria are discussed and evaluated in Findings 23 - 31.

Continuing with OAR 660-024-0050(6)

(6) When land is added to the UGB, the local government must assign appropriate urban plan designations to the added land, consistent with the need determination. The local government must also apply appropriate zoning to the added land consistent with the plan designation or may maintain the land as urbanizable land until the land is rezoned for the planned urban uses, either by retaining the zoning that was assigned prior to inclusion in the boundary or by applying other interim zoning that maintains the land's potential for planned urban development. The requirements of ORS 197.296 regarding planning and zoning also apply when local governments specified in that statute add land to the UGB.

Discussion: Changing the Comprehensive Plan Map designation of the affected properties in PA 11-01 to UGB is not accompanied by any other County or City zoning changes. Although none of the affected properties will be rezoned for their intended future designations until ODOT has approved a transportation impacts study that addresses the Transportation Planning Rule requirements, the Overlay Zones adopted by the City require

an approved Master Development Plan, and the land will not be developed for these future uses until they are annexed to the City. Until such time, all currently affected properties zoned for rural PA-80, RIPD, and RR-5 uses, will be prohibited from urban levels of development and land uses. ORS 197.296 does not apply to PA 11-01 because Scappoose's population is below 25,000 and is outside the Portland UGB.

Finding 22: The Board finds this criterion has been satisfied through the City's adoption of Ordinance 816 including the *Scappoose EOA's* determination and the related amendments to the City's Comprehensive Plan Goals and Policies and Development Code (Attachments B, C & D and Maps A, B, & C in the City's application).

Continuing with the Oregon Administrative Rules Division 24 - Urban Growth Boundaries:

660-024-0060 Boundary Location Alternatives Analysis

(1) When considering a UGB amendment, a local government must determine which land to add by evaluating alternative boundary locations. This determination must be consistent with the priority of land specified in ORS 197.298 and the boundary location factors of Goal 14, as follows:

(a) Beginning with the highest priority of land available, a local government must determine which land in that priority is suitable to accommodate the need deficiency determined under OAR 660-024-0050.

(b) If the amount of suitable land in the first priority category exceeds the amount necessary to satisfy the need deficiency, a local government must apply the location factors of Goal 14 to choose which land in that priority to include in the UGB.

(c) If the amount of suitable land in the first priority category is not adequate to satisfy the identified need deficiency, a local government must determine which land in the next priority is suitable to accommodate the remaining need, and proceed using the same method specified in subsections (a) and (b) of this section until the land need is accommodated.

(d) Notwithstanding subsection (a) to (c) of this section, a local government may consider land of lower priority as specified in ORS 197.298(3).

(e) For purposes of this rule, the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under section (5) of this rule, as well as other provisions of law applicable in determining whether land is buildable or suitable

(3) The boundary location factors of Goal 14 are not independent criteria. When the factors are applied to compare alternative boundary locations and to determine the UGB location, a local government must show that all the factors were considered and balanced.

(4) In determining alternative land for evaluation under ORS 197.298, "land adjacent to the UGB" is not limited to those lots or parcels that abut the UGB, but also includes land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency.

(5) If a local government has specified characteristics such as parcel size, topography, or proximity that are necessary for land to be suitable for an identified need, the local government may limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298.

(6) The adopted findings for UGB adoption or amendment must describe or map all of the alternative areas evaluated in the boundary location alternatives analysis. If the analysis involves more than one parcel or area within a particular priority category in ORS 197.298 for which circumstances are the same, these parcels or areas may be considered and evaluated as a single group.

(7) For purposes of Goal 14 Boundary Location Factor 2, "public facilities and services" means water, sanitary sewer, storm water management, and transportation facilities.

(8) The Goal 14 boundary location determination requires evaluation and comparison of the relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services needed to urbanize alternative boundary locations. This evaluation and comparison must be conducted in coordination with service providers, including the Oregon Department of Transportation with regard to impacts on the state transportation system. "Coordination" includes timely notice to service providers and the consideration of evaluation methodologies recommended by service providers. The evaluation and comparison must include:

(a) The impacts to existing water, sanitary sewer, storm water and transportation facilities that serve nearby areas already inside the UGB;

(b) The capacity of existing public facilities and services to serve areas already inside the UGB as well as areas proposed for addition to the UGB; and

(c) The need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements on existing roadways and, for urban areas of 25,000 or more, the provision of public transit service

Discussion: Because the proposed UGB expansion alternative boundary location analysis in OAR 660-024-0060 must be based on and consistent with the priority of land specified in ORS 197.298 and the boundary location factors of Goal 14 in OAR 660-014-0040, the next two sections of these Findings address these requirements.

The ORS 197.298 Priority Analysis is addressed in the Discussions related to Findings 23 through 25 while the analysis for the Goal 14 Location Factors is addressed in Findings 26 through 32.

Continuing with Oregon Revised Statutes Chapter 197 - Comprehensive Planning:

197.298 Priority of land to be included within urban growth boundary.

(1) In addition to any requirements established by rule addressing urbanization, land may not be included within an urban growth boundary except under the following priorities:

(a) First priority is land that is designated urban reserve land under ORS 195.145, rule or metropolitan service district action plan.

(b) If land under paragraph (a) of this subsection is inadequate to accommodate the amount of land needed, second priority is land adjacent to an urban growth boundary that is identified in an acknowledged comprehensive plan as an exception area or nonresource land. Second priority may include resource land that is completely surrounded by exception areas unless such resource land is high-value farmland as described in ORS 215.710.

(c) If land under paragraphs (a) and (b) of this subsection is inadequate to accommodate the amount of land needed, third priority is land designated as marginal land pursuant to ORS 197.247 (1991 Edition).

(d) If land under paragraphs (a) to (c) of this subsection is inadequate to accommodate the amount of land needed, fourth priority is land designated in an acknowledged comprehensive plan for agriculture or forestry, or both.

(2) Higher priority shall be given to land of lower capability as measured by the capability classification system or by cubic foot site class, whichever is appropriate for the current use.

(3) Land of lower priority under subsection (1) of this section may be included in an urban growth boundary if land of higher priority is found to be inadequate to accommodate the amount of land estimated in subsection (1) of this section for one or more of the following reasons:

(a) Specific types of identified land needs cannot be reasonably accommodated on higher priority lands;

(b) Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or

(c) Maximum efficiency of land uses within a proposed urban growth

boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.

Discussion: The *January 2011 Scappoose EOA* demonstrates that the City's existing UGB supply of commercial and industrial land cannot accommodate the projected 2030 Employment Need consistent with Statewide Planning Goal 9. The next step in this process required the City to ensure the land included in its UGB Expansion was consistent and complied with the priority requirements set forth in ORS 197.298. Accordingly, the City studied lands within one mile of the existing UGB and separated them into Four (4) Study Areas: # 1 - Northwest, # 2 - Northeast, # 3 - Southeast, & # 4 - Southwest - which are described on Page 27 of the City Council Findings and mapped in Appendix 2's five (5) Maps.

These 4 Areas were evaluated according to the ORS 197.298(1) Priorities requirements as follows. The County's current zoning designations are in parenthesis:

- First priority: Land designated as Urban Reserves*
- Second priority: Exception Areas (Rural Residential (RR-5) and non-resource zoned lands (Rural Industrial Planned Development (RIPD) or (2) resource land (PA-80, FA,-80 or PF-80) that are surrounded by Exception Areas unless the resource land is high-value farmland defined in ORS 215.710
- Third Priority: Marginal Land defined by ORS 197.247*
- Fourth Priority: Resource Land (PA-80, FA-80 or PF-80)

*Note: Columbia County has not designated any Urban Reserves or Marginal Lands. These Exception and Resource Zoned Areas are shown in Appendix 2's five (5) Maps. These Maps also accurately delineate these 4 Study Areas' Slopes, Existing UGB location, Tax Lots, Rivers, 100-Year Floodplains, and Soils Classifications (Classes I through VI).

Finding 23 The Board finds that the 5 Maps in Appendix 2 accurately delineate the 4 Study Areas' zoning, soil classifications, slopes, river, floodplains, and their distance from the City's existing UGB, all of which are needed in order for the City and County to evaluate the proposed 378-acre UGB Expansion's consistency with the Priorities Analysis in ORS 197.298 (1), (2) & (3).

Discussion: As discussed above, the City identified the required site characteristics for its targeted employers in order to meet its 20 Year Employment Land Need based on data from OBDD (see Findings 6 - 22). The City then applied these site characteristics requirements systematically for each priority category of land prescribed by ORS 197.298. Within all four of these study areas the City classified land according to ORS 197.298 Priorities as follows:

- Highest Priority - Exception Areas (RR-5 and RIPD zoned properties)
- Medium Priority - Agricultural (PA-80) Land with predominantly Class III soils

Lower Priority - Agricultural (PA-80) Land with predominantly Class II soils

A summary of the Key Council Findings on Pages 28 - 31 pertaining to ORS 197.298's Priorities include:

Highest Priority: Suitable Exception (rural residential and non-resource zoned) Areas

The bullet points below include a summary of exception area parcels that meet identified site suitability requirements for highway commercial (slopes less than 10% and within a 1/4 mile of Hwy 30 and for industrial (slopes less than 10% with access to a collector street; that do not abut established residential neighborhoods; larger than 5-acres, and on relatively low value agricultural soils).

- Study Area 1 - Northwest Commercial: 11 Suitable Acres (3 parcels)
- Study Area 2 - Northeast Industrial: 56 Suitable Acres (5 parcel)
- Study Area 3 - Southeast: 0 Suitable Acres
- Study Area 4 - Southwest Commercial: 15 Suitable Acres (all or part of 12 parcels)"

The Advisory Committee recommended including the 56 acres in the NE Area for industrial use and the SW Area 15 acres for highway commercial. Instead of including the 11 acres in the NW Area to meet identified highway commercial needs, the Advisory Committee recommended holding these commercial areas in reserve to justify future residential re-designation in conjunction with a future residential land needs assessment.

The three EC, RR-5, and RIPD zoned parcels in the NW Gilmore Road Expansion Area were not included in the original boundary location analysis because these Exception properties were not identified for inclusion until public testimony at the fall 2010 public hearings. After the SW Area's RR-5 land owners did not want their properties on the west side of Old Portland Road to be included in the UGB and rezoned for Highway Commercial uses, the city replaced this ~ 16 acres of RR-5 land with the 3 acres of Gilmore Road Exception properties that were suitable for future Highway Commercial uses and were split by the existing UGB.

The Fairview Cemetery in the SW Area would receive the Public Lands designation since it is not suitable for commercial development. All of the exception areas in the NE Area were proposed for inclusion in order to meet the projected industrial needs.

Medium Priority: Lower Value Resource Land After accounting for the capacity of the existing UGB and the nearby exception areas to accommodate commercial employment site needs, the Advisory Committee next considered the relatively low value agricultural lands meeting the identified site requirements. Their analysis determined:

- In the Scappoose area, the lowest value soils that also meet identified site requirements are Class III agricultural soils;
- Class IV soils and higher are associated with steeper slopes or are located within the 100 year flood plain (Appendix 2 Map 3);
- Since industrial land uses require large, undeveloped and flat properties with access to collector street(s), these sites are not available in any parcelized exception areas

- or in lowest capability (Class IV - VI) soils that typically exceed 15% slopes;
- Except for the NE Exception Area which has RR-5 parcels along Ring-A-Ring Road, the highest priority for industrial uses is PA-80 land with Class III soils;
- The only area adjacent to the existing UGB consisting of predominantly Class III agricultural soils is the NE Study Area immediately east of the Scappoose Airport;
- Industrial development in the NE Study Area is advantageous from a transportation analysis since it is supported by roadways that provide good circulation for local and non-local trips (documented in Appendix 4);
- The Advisory Committee and Planning Commission recommended that airport related industrial needs should be met immediately east of the airport and not along Highway 30, and the City Council concurred with these recommendations because of the above reasons.

Lowest Priority: Higher Value Agricultural Land

Reluctantly, the Advisory Committee and Planning Commission did not recommend including any land adjacent to the UGB within the SE Study Area since it contains predominantly higher value Class II Agricultural soils. This recommendation also acknowledged that excluding this area would not allow a future north-south collector road which would relieve traffic congestion on Highway 30 by connecting Havlik Road to Johnson's Landing Road. Priorities set forth in ORS 197.298 as they now exist do not allow the City to consider this SE Area's transportation needs because the other 3 Study Areas contain sufficient sites of higher priority: PA-80 properties with Class III soils.

UGB Adjustment to Minimize Impact on Higher Value Class II Agricultural Soils:

The Advisory Committee had several extensive discussions concerning the fact that the inclusion of portions of the NE Study Area consisted of Class II agricultural soils (high value farmland) shown in the maps in Appendix 2 as well as Appendix 5's *Scappoose Airport Land Use Concept Plan*. Consequently, the proposed UGB was re-aligned to the west to avoid ~ 30 acres of Class II soils located east of the airport and near the Jackson Creek floodplain. The Columbia County NRCS District Conservationist also submitted concerns in September 2010 about the NE Study Area's amount of prime farmland that would be compromised by their inclusion in the UGB. The Scappoose Bay Watershed Council also submitted comments requesting the wetlands should be preserved and all activities impacting these wetlands need to be authorized and approved by the Oregon Department of State Lands.

This subsequent western UGB re-adjustment also realigned the future collector connecting road which will now head due north rather than northeast that also maximizes land use efficiency. This realignment will also reduce the proposed amount of higher value Class II soils included in the UGB expansion from 70 to 41 acres. The final NE Area's UGB expansion includes the following acreage by soils priority class and shows over 88% of this acreage (313 of 354 acres) consists of highest and medium priority land:

- 77 gross acres in RR-5 & RIPD exception areas (highest priority)
- 236 gross PA-80 acres with Class III soils (medium priority)
- 41 gross PA -80 acres with Class II soils (lowest priority)

Finding 24: For the foregoing reasons, the Board finds the application submitted for PA 11-01 has satisfied the Priorities Analysis criteria in ORS 197.298 in determining their requested 378-acre UGB Expansion.

Continuing with the Goal 14 Location Factors:

Location Factor 2: Orderly and economic provisions of public facilities and services

Appendices 3 & 4 examines the City's existing sanitary sewer, water, storm drainage, and transportation master plans and systems and identifies projects needed to serve the existing UGB as well as potential expansion alternatives. The Scappoose UGB *Amendment Infrastructure Report* in Appendix 3 consistently states that funding for the extension of city water, sanitary sewer, stormwater drainage, and roads to these UGB expansion areas will be dictated by development and or funded solely by developers since the City has no Capital Improvement Projects proposed for these areas. The Advisory Committee reviewed Drafts of these documents that are summarized below:

Exception Area Alternatives: Appendices 3 & 4 identify public facilities projects that will be necessary to serve the suitable land in the NE and SW Areas. Appendix 3's Infrastructure Report concludes it is feasible to serve these sites but that these extensions are not presently within the City system development or capital improvement plans. A sanitary sewer pump station would be needed to serve the SW Area and public facilities would need to be provided to intervening lands before it becomes affordable to serve these relatively small exception areas. Appendix 4's UGB Transportation Analysis identified that the NE Area received the highest transportation ranking due to its existing transportation infrastructure and access to Highway 30.

Lower Value Resource Land Alternative: Providing sewer, water and storm drainage facilities efficiently to the NE Area will depend on this area's phased development and includes the construction of a north-south connecting road. Appendix 3 includes a public facilities phasing program while Appendix 4.A. states that construction of the north-south connection between Crown Zellerbach, Moore and North Honeyman Roads would reduce traffic congestion along Highway 30.

The City Council Findings conclude on Page 35 that it is feasible to provide sanitary sewer, water, storm drainage and transportation facilities to these NE and SW Expansion Areas. A comparative per acre cost basis shows it is less expensive to extend these facilities and services to the NE Industrial Expansion Area than to the smaller and distant SW & NW Commercial Expansion Areas. Although the Advisory Committee did not recommend including the NW Area, Gilmore Road Expansion Area, in the 378-acre UGB Expansion was included to correct the mapping irregularities of these existing RR-5, EC and RIPD zoned properties.

Finding 26: The Board agrees with the City's findings and conclusions discussed above and finds that based on the City's determinations, it will be feasible to connect future sanitary sewer, water, storm drainage and transportation services in the 378-acre UGB Expanded area as orderly and phased improvements of the City's existing services.

Accordingly, the application has satisfied this criterion.

Continuing with the Goal 14 Location Factors:

Location Factor 3: Comparative Economic, Social, Environmental, and Energy Consequences (ESEE)

Highlights of the City Council Findings on Page 35 summarize the comparative ESEE consequences of the NE, SW, and NW Study Areas as follows.

Exception Area Alternatives:

Economic Consequences: Including these 3 areas will have positive economic consequences by providing employment opportunities but the cost of providing public facilities and services to the NW and SW will be relatively high on a per acre basis compared with the NE. Some of the infrastructure upgrades to the SW would also serve properties within the UGB but are outside the City's current sanitary sewer service area.

Social Consequences: Social consequences will be high for including the SW and NE residentially zoned properties for commercial and industrial development because people will lose potential and future home sites in these areas. The county received a letter from William and Brenda Stape, residents of 53877 Ring a Ring Road who also expressed their objections to including their RR-5 zoned neighborhood in this UGB expansion because it will detrimentally impact their quality of life. The City and County anticipate that these adverse social consequences will be offset by increased employment opportunities and improved access to retail services.

Environmental Consequences: The City states there are no significant environmental consequences for including the resource land in the NE Area because they have moved way from Jackson Creek's floodplain and their associated wetlands, and the UGB Expansion does not propose any changes to the City's policies that apply to the Crown Zellerbach Trail submitted in Appendix 7.A. Also, there will be less impact on the environment from auto emissions if more jobs are provided locally for area residents. However, the Scappoose Bay Watershed Council's comments dated May 5, 2011 state the proposed 15-acre park and the north-south connector road are in close proximity to wetlands further east and not included in this UGB expansion. These wetlands are identified in the National Wetlands Inventory Map of St. Helens, Oregon as Palustrine Scrub Shrub (PSSC) and Palustrine Emergent (PEMC) Wetlands both of which are Seasonally Flooded. The Scappoose Bay Watershed Council recommends future development related to the relocation of the Crown Zellerbach Trail, the regional park, and the north-south connector road be designed to minimize impacts to these wetlands and permitted only as authorized by the Oregon Department of State Lands.

Energy Consequences The energy consequences of including all three Areas will be positive since the additional employment opportunities will improve time and energy spent by city and county residents commuting outside the county for work and shopping.

Lower Value Resource Land Alternative: (discussion is limited to the NE Area since it is

the only area containing Class III soils that are lower priority than Class II soils)

Economic Consequences States that although the approximate 2,600 new jobs planned for this area through 2030 will be an economic benefit for Scappoose, its current farming activities will be eliminated from this area.

As stated in the County Comprehensive Plan Agriculture section:

"Columbia County's agricultural profile is and will continue to be that of small acreage, high intensity farming. The predominant characteristic of the Columbia County farm is that it is operated as a part-time venture. In 2007, 68% of principal farm operators worked a portion of their time off of the farm and 41% worked more than 200 days off of the farm. In the same year, 61% of principal farm operators named non-farm occupations as their principal occupation."

The potential for replacing any part-time agricultural work with full time employment opportunities in the NE Area will be an economic benefit to the county and city.

The application also states that the proposed north-south connection road will also reduce traffic congestion on Highway 30. The County foresees the only traffic reduction along Highway 30 that will occur will be the hopeful reduction of commuters to and from the Portland Metro region. Additional employment opportunities in Scappoose will essentially increase traffic along Highway 30 for commuters who may not reside in Scappoose. Nevertheless, the future ODOT approved Transportation Impact Analysis will sufficiently address and these issues prior to any future industrial development near the airport.

Social Consequences Although the increased traffic would increase airport and road noise level and reduce the ability of local residents from enjoying recreational opportunities along CZ Trail, the city contends that providing employment opportunities will result in residents' increased income and more time can be spent with families and friends that is not spent in commuting to jobs and/or shopping outside the area. The proposed new park along the CZ Trail would also provide local parking and staging areas for bicycle and water recreation which will also result in positive social impacts.

Environmental Consequences The City states UGB Expansion does not include the Jackson Creek floodplain and its associated wetlands. The proposed bicycling staging area will occur near an approximate 20 acre wetland identified in the Scappoose Local Wetland Inventory and the National Wetlands Inventory. All work within these wetlands as well as all off or on site mitigation shall be authorized and approved by the Department of State Lands as a condition of approval.

Energy Consequences The City states the energy consequences of including the NE Expansion Area for industrial uses will be positive since local employment will reduce energy consumption for commuters who work outside of the county.

Finding 27: The Board finds the City has evaluated and compared the ESEE

consequences of the 4 Study Areas included in this proposed 378-acre UGB Expansion, and that based on the just referenced discussion, the application is consistent with the provisions in Goal 14.

Finding 28: The Board finds the CZ Trail relocation and the new bicycle staging area within the 15-acre Park shall also minimize impacts to any nearby PEMC and PSSC wetlands and that all work within wetlands shall be authorized and approved by the Oregon Department of State Lands.

Continuing with the Goal 14 Location Factors:

Location Factor 4: Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB.

Exception Area Alternatives: The City states that the NE Area's residentially developed properties are currently, potentially, more incompatible now than they will be after they are both rezoned for industrial uses. The Board concurs with this final conclusion but predicts the transition time between these uses could be very difficult for residents living in close proximity to land that is becoming more and more industrially developed. The SW Area does not abut any PA -80 zoned properties. Two of the NW Gilmore Road properties are already zoned for EC and RIPD uses and should not be expected to be more incompatible with the adjacent PA-80 land to the north and south with their future commercial zoning.

Lower Value Resource Land Alternative: Including the NE Area will not result in significant incompatibilities with adjacent PA-80 uses because industrial uses are more compatible with farm uses than residential uses since they are not as sensitive to dust, noise and chemical impacts. The proposed north-south connector road to the east of the airport will also provide a barrier and buffer to the remaining PA-80 properties and uses located outside the UGB.

Finding 29: The Board finds that converting the NW Area's rural zoned RR-5, EC and RIPD properties to urban commercial uses should not increase conflicts with nearby agricultural land. The Board also finds that potential adverse impacts on PA-80 properties adjacent to the NE Area's future industrial uses will also provide a barrier and buffer to the proposed north-south collector road to the east of the airport.

Finding 30: The Board finds that the City's utilization of Goal 14's Locational Factors to evaluate the 4 Study Areas for this proposed 378-acre UGB Expansion is consistent with required provisions in OAR 660-014-0040 and the Priorities Analysis in ORS 197.298 (Findings 23 - 25), provided the County reviews and approves any changes to the existing multi-purpose recreational CZ Trail.

Finding 31: The Board finds that any detrimental environmental impacts to the NE Area's identified wetlands due to the future park staging area, north-south collector road, and relocation of the CZ multi-purpose Trail, that encompass more than 50 cubic yards, will require authorization and approval from the Oregon Department of State Lands.

Continuing with the applicable Parts of the Columbia County Comprehensive Plan:

PART II CITIZEN INVOLVEMENT

The Goals and Policies of Part II of the Comprehensive Plan require opportunity for citizens to be involved in all phases of the planning process.

Finding 32: Generally, Part II is satisfied when a local government follows the public involvement procedures set out in State statutes and in its acknowledged Comprehensive Plan and land use regulations, which has been completed for this application. This is explained further in Findings 2 and 5 above and under Part III of the Comprehensive Plan discussions. Additionally, the Scappoose-Spitzenberg Citizen Planning Advisory Committee was notified of the proposed urban growth boundary expansion and given opportunity to comment. The Board finds that the criterion is met.

Continuing with applicable Parts of the Columbia County Comprehensive Plan related to Planning Coordination:

PART III PLANNING COORDINATION

Part III of the Comprehensive Plan requires coordination with affected governments and agencies.

Finding 33: In accordance with Section 1603 of Columbia County's Zoning Ordinance, ORS 215.060 and ORS 197.610, the County provided notice of the hearing with the opportunity for comments to DLCD, the Scappoose-Spitzenberg CPAC members, affected property owners, and other affected governmental entities. The Board has addressed comments received throughout these Findings. Any and all comments, received as of the date of the County's last public hearing and the permitted evidence and response submittal dates are discussed under COMMENTS RECEIVED at the end of these Findings. Additionally, this Comprehensive Plan Map Amendment is subject to the Legislative public hearing process and were heard by the Planning Commission (for a recommendation) and by the Board of County Commissioners (for a decision). These hearings were advertised and open to the public and provided additional opportunity for public comment. The Planning Commission hearing was held on June 6, 2011, The Board held a hearing on July 27 and deliberated in a public meeting on August 31, 2011. All of these requirements have been satisfied through the public notice process.

Continuing with the applicable Parts of the Columbia County Comprehensive Plan related to Agriculture:

PART V AGRICULTURE

BACKGROUND

Next to the wood products industry, Columbia County's second most important economic activity has been, and continues to be, Agriculture. However, according to 1975 statistics, agricultural employment contributed only 6% of the County's income and employed only 2% of the County's work force. These percentages have not shown significant change

since 1975.

In keeping with the nationwide trend during recent years, the number of acres in farm use in the County has been steadily decreasing. Statistics compiled for the period from 1982 to 2007 that the total acreage in the "all farms" category has decreased as a percentage of all land in the County from 18% in 1982 to 13% in 2007. Fewer County farmers rent or are part owners of their farms. The percentage of farm operators who were either only part-owners or rented their farms decreased from 24% in 1992 to 17% in 2007.

According to the Natural Resources Conservation Service, Columbia County has a total of 57,649 acres of Class I through IV soils. The breakdown by acreage for each class is as follows:

Class I	387 acres
Class II	28,638 acres
Class III	25,890 acres
Class IV	2,734 acres

Commercial agriculture in Columbia County is limited by many factors.

- A. Distance from processing. Small fruits and vegetables represent the high value crops in the Willamette Valley. Columbia County growers, to some degree, are isolated both geographically and "psychologically" from these markets.

Finding 34: Although the UGB expansion includes the urbanization and potential conversion of 281 gross acres of primary agricultural land to industrial land, this is necessary in order for the city to provide increased full-time industrial opportunities. Historically, the Comprehensive Plan acknowledges that agricultural employment in the county is mostly part time. Recent trends confirm that agricultural employment employs less than 5% of the County's workforce even though it is the County's second most important resource related industry next to wood products. The city's inclusion of only 41 acres of Class II soils in this UGB expansion demonstrates their intention of minimizing the potential conversion of the high value farmland that is not close to the airport. From the original concept plan, the proposed NE Airport Employment Area has moved closer to the airport to avoid high value Class II farmland. The Board finds the proposed UGB expansion will be able to provide the county and city with more full-time employment opportunities in the industrial sector, will help the southern portions of the county more economically self-sufficient, and will help it transition away from its historical reliance on resource based employment.

Continuing with applicable Parts of the Columbia County Comprehensive Plan related to Agriculture:

AGRICULTURE: GOALS AND POLICIES

GOAL: To preserve agricultural land for agricultural uses.

POLICIES: It shall be a policy of the County to:

2. If the County proposes to convert agricultural lands (as defined by Statewide Land Use Goal 3) to urbanizable land, the County shall follow the procedures and requirements for exceptions to the Agricultural Lands goal, pursuant to Goal 2. Those uses which are permitted by ORS 215.283(1) or (2) shall not require an exception to the Agricultural Lands goal.
9. Avoid extension of urban facilities and services into agricultural areas whenever possible. No water or sewer facility shall be designed to provide domestic service to agricultural areas.
10. Encourage roads through agricultural areas to locate where they will have minimum impacts on agricultural management and the existing lotting pattern.
12. Require that conversion of rural land to urbanizable land be based on the criteria set out in Goals 3 and 14.

Finding 35: The Board finds the proposed UGB expansion is consistent with these Comprehensive Plan policies because the conversion of rural to urbanizable lands was based on the criteria in ORS 197.298, the Goal 14 Factors and OAR 660-024-0060. The future extension of water, sanitary sewer, stormwater drainage and roads to the urbanizable areas will also be extended from the existing UGB and not across any agricultural areas.

Continuing with the applicable Parts of Columbia County Comprehensive Plan related to Rural Residential

PART VII. RURAL RESIDENTIAL

RURAL RESIDENTIAL: GOALS AND POLICIES

GOAL: It is the goal of the County to provide for the continuation and needed expansion of Rural Residential uses on those resource lands where a valid exception can be, or has been shown to be, justified.

POLICIES: It shall be a policy of the County to:

5. Encourage the in-filling of existing built and committed lands for new residential development.
6. Encourage rural growth in exception areas where facilities and services such as adequate transportation networks, school facilities, fire districts, water and police services, etc. already exist so as to minimize costs of providing such services to these areas.

Finding 36: A valid exception from agricultural use was made as part of the County's initial acknowledged Comprehensive Plan to rural residential in and around Ring-a-Ring

Road. The proposed UGB expansion calls for the urbanization of approximately 32 acres of rural residential zoned properties and their intensification of uses is consistent with the policies of the Rural Residential designation that encourages increased development opportunities within these built and committed exception areas. But, logically this UGB expansion is not consistent with the Rural Residential Goal because the expansion would convert residential properties to employment properties. However, in the last decade many of these residential properties have been bought out by airport or gravel mining interests. In the NW and SW Expansion areas for planned commercial, the residential uses are less than ideal because of the highway noise and related hazards for household pets. A natural conversion away from residential is occurring in these areas anyway. The Board finds that the loss of 7-10 residential units in these conversion areas is outweighed by the benefit of potential increased jobs and services to the community as a whole.

Continuing with the applicable Parts of the Columbia County Comprehensive Plan related to Urbanization:

PART IX URBANIZATION

GOAL: To create and maintain the urban growth boundaries based upon Statewide Planning Goal 14, ORS 197.298, OAR 660, Division 24 and other relevant state laws as provided in the Background section.

Urban growth boundary changes or expansions are guided by OAR 660, Division 24, which identifies rules regarding the adoption or amendment of an urban growth boundary; ORS 197.298, which establishes priorities of land to be included within urban growth boundaries; and Goal 14: Urbanization. Goal 14 requires Urban Growth Boundary amendments to be based on land need criteria and boundary location factors.

POLICIES: It shall be a policy of the County to:

1. Provide an orderly and efficient transition from rural to urban land use.
2. Accommodate urban population and urban employment inside urban growth boundaries, ensure efficient use of land, and provide for livable communities.
6. Control development within the limitation of the public's ability to provide services.
7. Develop managing techniques with the incorporated cities.
9. Provide direction for developers to utilize land within the boundary in the most efficient manner.
10. Review the supply of buildable lands within the urban growth boundaries in cooperation with the cities, during each major review of the County's plan.
14. Support the annexation by cities in accordance with the State statutes.

17. Adopt the urban growth boundaries, and those portions of the adopted comprehensive plans relating to the unincorporated urban growth areas, for the municipalities of Clatskanie, Columbia City, Rainier, Scappoose, St. Helens, and Vernonia.
18. Periodically update coordinated 20-year population forecasts for each city's urban growth boundary and for the unincorporated areas, based upon the projections of a regionally accepted population forecast, such as the studies prepared by the Portland State University and the BPA. The County's projection will be within 10% of the regionally accepted projection and the incorporated cities' projections will be allocated on a jurisdiction by jurisdiction basis.
20. Limit development outside of urban growth boundaries to densities which do not require an urban level of public facilities or services and are consistent with Goal 14 and OAR 660, Division 4.

Finding 37: The Board finds that the City of Scappoose's request for PA 11-01 is consistent with the Urbanization Goals and Policies of the County Comprehensive Plan that mirror the regulatory requirements of Statewide Planning Goal 14, ORS 197.298, and OAR 660, Division 24 which have been addressed in this report.

Continuing with applicable Parts of the Columbia County Comprehensive Plan related to Economy:

PART X. ECONOMY

PREFACE:

The goal to diversify and improve the economy of the area has been addressed in the Overall Economic Development Program (OEDP) Plan for Columbia County. The County has an important role in diversifying and improving the economy of the area, beyond the work accomplished by the OEDP committee. When private investors decide to spend private money in an activity which improves the local economy, the County can encourage that investment by having adequate land designated for industrial and commercial uses, and by assuring an adequate level of services will be able to be provided.

The County Board of Commissioners created the Port of St. Helens to be the body to further the economic development in the County. The Port has been an active leader in securing land and needed improvements for the expansion of the economy within their boundaries.

The County has recognized the need to diversify its economy and to reduce the unemployment rate. Since 1975, the unemployment rate has exceeded the federal and state levels. The State Department of Economic Development and the Board of County

Commissioners have approved the designation of Columbia County as an economically lagging area based upon its high unemployment rate. This designation allows tax credit for particular types of investment which would promote more balanced development opportunities.

The problems and the opportunities found in the County are summarized here. This is not necessarily a complete list of findings.

Problems:

- cities with small tax base in need of public facilities
- industrial sites without public facilities
- economic opportunities which are not labor intensive
- poor road conditions, increasing distance to jobs and markets
- large percent of labor force employed out of town
- agricultural production expenses exceeding market value of products

Opportunities or Economic Advantages:

- railroad, highway, and airport available to industrial activity
- good hospital and cities capable of providing urban facilities
- Port Commission and OEDP Committee committed to support of economic development activity

Finding 38: The submitted 378-acre UGB expansion will allow the City of Scappoose to play an important role in diversifying and improving the economy of the area by providing additional airport- related industrial development opportunities in the county. This proposed expansion, the subsequent extension of public facilities and services, and new Airport Employment Zoning will also encourage commercial growth and expansion of the city's predominantly recreational airport. These future AE uses will also encourage more local private industrial and commercial investment opportunities in southern portions of the county and increase affected tax bases.

Representatives from the Port of St. Helens were on the Ad Hoc Advisory Committee and actively participated in the review and final recommendation of the *January 2011 Scappoose EOA*. The county's current Economic Development Coordinator supports the City Council Findings and decision to adopt the UGB Expansion as presented in PA 11-01. At the June 6, 2011 public hearing, the Planning Commission heard testimony in favor of the proposed UGB Expansion from various local business owners who felt this would increase their economic opportunities. Similar testimony was also submitted at the Board hearing on July 27, 2011. For these reasons, the Board finds the proposal will help to alleviate the county's historic economic problems by utilizing its historic advantages that remain relevant to the county's economic growth.

Continuing with applicable Parts of the Columbia County Comprehensive Plan related to Economy:

ECONOMIC GROWTH:

Throughout the County's history, it has been characterized as unique in its geography, resources, and population aspects. It has the transportation, recreational, and cultural aspects associated with a large body of water, yet it is not part of the coastal area. Its proximity to the Portland and Longview metropolitan areas means much in potential economic and recreational activity, yet the barriers imposed by terrain and traditional settlement patterns have worked against large scale development. Thus, Columbia County is neither a coastal county nor a part of a metropolitan region, although aspects of both are strikingly apparent. Essentially, it is a rural area with small service-oriented communities whose people enjoy the advantages of "country living". Agriculture has historically been an important portion of the County's economy; however, in recent years it has been declining in importance.

POPULATION:

The population of Columbia County at the time of the 2000 census was 43,560. The 2008 County population estimated by the Center for Population Research at PSU is certified at 48,020. The 2010 County population estimated by the Center for Population Research at PSU is estimated at 48,695. Based on 2010 population estimates, more than one-half of the population lies in the incorporated areas (approximately 56.57%) while the remainder is found in the unincorporated areas (approximately 43.43%) of the County.

LABOR FORCE:

Nearly one-third of the County's labor force was employed outside the County in 1970; the State average was 15%. Many people view Columbia County as a place to live while working in Portland or Longview. The majority of the immigrants and commuters are locating in the southeastern portion of Columbia County and in the Rainier area.

GOALS:

1. To strengthen and diversify the economy of Columbia County and insure stable economic growth.

POLICIES: It shall be a policy of the County to:

1. Encourage the creation of new and continuous employment opportunities
2. Encourage a stable and diversified economy.
8. Reserve valuable industrial sites for industrial uses.
10. Support improvements in local conditions in order to make the area attractive to private capital investment. Consideration of such factors as the following shall be undertaken:
 - A. Tax incentives

B. Land use controls and ordinances

C. Capital improvements programming

12. Encourage new industrial growth within the urban areas so as to utilize existing public facilities.
13. Encourage industry which needs or can benefit from the locational advantages of an airport and its facilities, to locate adjacent to one of the airports in the County. Create an Airport Industrial district to facilitate this policy. *[added 7-93]*

Finding 39: The Board finds that the City of Scappoose's requested UGB Expansion will help address some of the county's historical employment disadvantages by taking advantage of the city's proximity to the Portland Metropolitan Service Area and encouraging more diversified local economy that will encourage the airport's industrial and commercial growth. The proposed AE zoning will enable the city to incorporate economic strategies that are consistent with the Comprehensive Plan's Economic Goals and Policies in light of the County's and City's projected Population Forecasts and Labor Force characteristics.

Continuing with the applicable Parts of the Columbia County Comprehensive Plan related to Commercial:

PART XI. COMMERCIAL

Currently in Columbia County there are fifty-five (55) parcels outside of recognized urban growth boundaries that are committed to some type of commercial activity. The majority of these parcels were committed to commercial use prior to the initial zoning of the County in 1973. Many of these parcels support more than one commercial enterprise. Most of the parcels are currently designated as commercial.

EXISTING COMMERCIAL:

This plan and zoning designation will assure the continuation and limited expansion of all lawful commercial activities regardless of type or location. The adoption of this plan and zoning designation for a parcel is intended to recognize the legitimacy of the existing use while not directly implying that commercial activities are appropriate for a specific area.

Finding 40: Upon annexation of the affected properties, 16 acres of RR-5 land and 2 acres of EC and RIPD zoned parcels will be rezoned for Highway Commercial use. This will assure the continuation and expansion of commercial activities in these exception areas provided the necessary public facilities and services are extended to support these commercial activities. The Board finds the proposal is consistent with the Commercial policies of the Comprehensive Plan.

Continuing with the applicable Parts of the Columbia County Comprehensive Plan related to Industrial Siting:

PART XII. INDUSTRIAL SITING

INDUSTRIAL ECONOMIC ANALYSIS:

INTRODUCTION

Decisions made in the private sector will help determine whether or not growth occurs in the county. The county and/or the state can facilitate growth or they can prevent it from occurring, but they cannot, on their own, make it happen.

PROBABLE GROWTH

1. Columbia County Factors.
 - A. The commuter population to Portland and Longview will increase, based on the growth within those areas and the cost and ease of commuting, the price of gasoline and automobiles, and maintenance.
 - D. In the long-term, as the labor forces grows, small light industries will or can be attracted, based on the availability of labor as well as the other location factors.
2. State Perspective.
 - B. There is a need within the state for large isolated sites for heavy industry. These sites must be isolated and separated from concentrations of populations. While these sites themselves need to be isolated, they also need to be relatively close to major sources of support industries, services, and be served by multi-modal transportation. There are not many areas in the state where these sites exist.
 - C. The State needs to diversify its economic base, and the above types of sites located in Columbia County will contribute to that diversification.

Finding 41: As covered throughout these Findings, the request as presented in PA 11-01 originated from the *Scappoose EOA* which recommended the City Council to adopt Ordinance 816 to expand the UGB and amend the Scappoose Comprehensive Plan and Development Code accordingly. Although the intent of the 378-acre UGB Expansion is to make the Scappoose area more attractive to private investors, the expansion and necessary rezoning, in and of themselves, will not guarantee the realization of the City's projected 2030 Employment Growth and Land Use Needs. Nevertheless, the city's request was based on an authorized and factual based approximate 3-year long Economic Opportunities Analysis. The resulting *January 2011 Scappoose EOA* was developed with and evaluated by representatives from the public and private sectors and modified to reflect concerns expressed during various public hearings. For these reasons, the County finds the submitted proposal is consistent with the Comprehensive Plan's identified Growth Factors and Economic Analysis related to the siting of the County's industrial activities.

Continuing with the applicable Parts of the Columbia County Comprehensive Plan related to Industrial Siting:

INDUSTRIAL LANDS EXCEPTIONS:

Columbia County has a need for more vacant industrial land than is available within the UGBs (see Industrial Economic Analysis above). In order to satisfy the need, Columbia County has designated five (5) sites outside of the UGB's as industrial. These are:

- The Scappoose Industrial Airpark which has 233 acres under a type 1 exception and 16 acres under a type 2 exception;

The Scappoose Industrial Airpark, because of its unique airpark facilities, does not compete for the same industries as other sites within or without urban growth boundaries.

INDUSTRIAL DEVELOPMENT: GOALS AND POLICIES

GOALS:

1. To strengthen and diversify the economy of Columbia County and insure stable economic growth.
2. To utilize Columbia County's natural resources and advantages for expanding and diversifying the industrial base.
3. To encourage industrial growth in Columbia County to diversify its economy. New industry should locate to take maximum advantage of existing public and private investments.

POLICIES: It shall be policy of the County to establish, implement, and maintain an industrial development program that:

1. Encourages the creation of new and continuous employment opportunities.
2. Encourages a stable and diversified economy.
6. Reserves valuable industrial sites for industrial use.
7. Supports improvements in local conditions in order to make the area attractive to private capital investment. Consideration of such factors as the following shall be undertaken
 - A. Tax incentives
 - B. Land use controls and ordinances
 - C. Capital improvements programming
8. Coordinates with public utility companies to insure energy supplies are available to areas programmed for development and redevelopment.
10. Directs labor intensive industries and/or industries needing extensive public facilities to sites within urban growth boundaries.

Finding 42: The submitted proposal will provide the City of Scappoose with new and continuous employment opportunities and a stable and diversified economy that will also preserve their existing and unique industrial resource, the Scappoose Airport/Airpark. The City Council Findings also state that the needed public services and facilities (water, sanitary sewer, stormwater drainage, and roads) will be funded by developers to help direct the orderly and efficient extension of these services with minimal costs at the public's expense. The Board finds the proposal is consistent with the Comprehensive Plan's Goals and Policies for Industrial Development and will help maintain the economic viability and diversification of the Scappoose Airport/Airpark and the southern portions of the county.

Continuing with the applicable Parts of the Columbia County Comprehensive Plan related to Industrial Siting:

RESOURCE INDUSTRIAL DEVELOPMENT: GOALS AND POLICIES

GOAL:

It is a goal of the County to provide for industrial development on rural lands when such development can be shown to support, utilize, or in some manner be dependent upon, the natural resources of the area.

Finding 43: The Board finds that the RIPD zoning near the airport and in the Gilmore Road Expansion Area is no longer needed to support, nor are they dependent upon, these specific areas' farm, forest, or aggregate resources. The affected properties and their surrounding areas have become more urban in nature over the last three decades and can be put to more appropriate highway commercial and/or airport related industrial uses by including them in the UGB. One affected property owner in the Gilmore Road Expansion Area spoke in favor of the UGB Expansion since it would increase his business' economic opportunities.

Continuing with the applicable Parts of the Columbia County Comprehensive Plan related to Transportation:

Part XIII TRANSPORTATION

AVIATION

Aviation is one of the smallest components in the County's transportation system. The cost of utilizing this form of transportation has placed it beyond the means of most residents of the County.

The largest airport is the Scappoose Industrial Airpark, owned by the Port of St. Helens. Located less than a mile northeast of Scappoose, this airport is growing steadily and is expected to be used as the base for aircraft from the Portland area when the general aviation facilities at Troutdale and Hillsboro reach their capacity.

This airport is classified as a Basic Utility Airport according to the Oregon Aviation System Plan (OASP). This means the facilities of the airfield are capable of handling 95% of all propeller aircraft under 12,500 pounds. The Port of St. Helens Master Plan for the airport includes a schedule for the upgrading of this airfield. The runway will be lengthened from 4,000 feet to 6,000 feet in length.

The Scappoose Industrial Airpark is expected to have a substantial increase in the number of aircraft based at the field and the number of operations conducted at the airfield in the next 10 years.

Finding 44: The Board finds the requested 378-acre UGB Expansion's inclusion of the Scappoose Airport/Airpark and provisions allowing additional industrial employment opportunities is consistent with the Port of St. Helens Master Plan for this unique economic resource which is also identified as an essential component of County's Transportation System in the Comprehensive Plan. For these reasons, the Board finds that including the airport in city's UGB will help the county and city to better utilize, develop, and take advantage of this essential component of their transportation system.

Continuing with the applicable Parts of the Columbia County Comprehensive Plan related to Transportation:

EXISTING ROAD SYSTEM

The existing road system can be divided into two parts: State highways and County roads. The State Highway System consists of three primary roads which comprise the major routes throughout the County for automobile and truck traffic travel. These highways carry the highest volume of traffic and serve the greatest percentage of the County's population. ODOT has designated U.S. 30 as a principal arterial (non-interstate). This highway goes through or close to all of the incorporated cities, with the exception of Vernonia. The road serves as a secondary north-south truck route, parallel to Interstate 5. U.S. 30 is being upgraded through a series of construction projects.

ACCESS TO MAJOR ROADS

Portions of U.S. 30 have been widened to allow for a better flow of vehicular traffic. However, this widening will encourage problems with congestion, if the number of access points is allowed to increase unrestricted. The additional traffic conflicts which could occur with an increase in access points could nullify the benefits of the new road construction. The use of a limited number of access points onto major roads will reduce the potential for traffic congestion and related problems. This can be accomplished by the use of such mechanisms as shared driveways and frontage roads.

GOAL:

The creation of an efficient, safe, and diverse transportation system to serve the needs of Columbia County residents.

OBJECTIVES:

1. To utilize the various modes of transportation that are available in the County to provide for the residents.
2. To encourage and promote an efficient and economical transportation system to serve the commercial and industrial establishments of the County.

Finding 45: Although the UGB Expansion in and of itself does not require an ODOT approved Traffic Impact Analysis (TIS) per the Statewide Planning Rule in OAR 660-012-0060, this comprehensive analysis will be required prior to any future rezoning and subsequent industrial and/or commercial development. This TIS will need to identify and appropriately address the impacts these future uses will have on Highway 30 and on the surrounding street system to ensure the affected areas (and uses) can be served by an efficient, safe, and diverse transportation system without compromising the needs of Columbia County residents and labor force.

Continuing with the applicable Parts of the Columbia County Comprehensive Plan related to Public Facilities and Services:

PART XIV. PUBLIC FACILITIES AND SERVICES

Urban and rural developments are to be guided by public facilities appropriate for the needs of the areas to be served. Plans for public facilities and in urban areas should be provided at levels that are necessary and suitable.

PUBLIC FACILITIES AND SERVICES: GOALS AND POLICIES

GOAL:

To plan and develop a timely, orderly, and efficient arrangement of public as a framework for urban and rural development.

POLICIES: It shall be County policy to:

1. Require that adequate types and levels of public facilities and be provided in advance of or concurrent with development.
4. Encourage new development on lands within urban growth boundaries or built and committed exception areas.
9. Direct new development into areas where they exist or are proposed within a reasonable time frame.

Finding 46: The 378-acre UGB Expansion will not result in any additional commercial or industrial site development until the city prepares the required Public Facility Plans to support these properties' future development. Appendix 3's *Scappoose UGB Infrastructure*

Report analyzed the UGB's existing infrastructure and identified potential improvements that would be required before it would be able to support the projected future industrial and commercial growth in twenty years. This report states that because these improvements are not included in the city's capital improvement plans the city is expecting developers to fund the extension of city water, sanitary sewer, storm drainage facilities, and roads to the affected areas and properties. Since no industrial or commercial development will occur prior to these extensions, the Board finds the proposal is consistent with the Comprehensive Plan's Goals and Policies related to Public Facilities and Services. If any development of the UGB lands is proposed to occur before the land is annexed into the City and rezoned for urban uses, prior to any future development in the unincorporated areas, existing County regulations require the County to approve Site Design Review(s) that address the proposed site development's traffic impact analysis as well as demonstrate adequate provisions have been made for water, sewer and storm drainage facilities.

Continuing with the applicable Parts of the Columbia County Comprehensive Plan related to Open Space, Scenic and Historic Areas and Natural Resources:

PART XVI. GOAL 5: OPEN SPACE, SCENIC AND HISTORIC AREAS, AND NATURAL AREAS:

ARTICLE I. PURPOSE OF PLAN:

To conserve open space and protect the identified natural and scenic resources in Columbia County as defined by Statewide Planning Goal Five and the related administrative rule.

ARTICLE X. WATER RESOURCES

A. WETLANDS

DEFINITION:

Wetlands are primarily lowlands covered by shallow and sometimes temporary or intermittent waters. Often they are referred to as marshes, bogs, swamps, wet meadows, sloughs, and overflow lands. Plant and animal communities in wetlands are dependent on at least periodic saturation by water.

A significant wetland is typically an area that is inundated or saturated by surface water or ground water at a frequency and duration sufficient to support, and that under normal circumstances does support, a prevalence of vegetation typically adapted for life in saturated soil conditions.

FINDINGS.

Columbia County contains abundant wetlands within its boundaries. Many of these wetlands lie along the Columbia River within the old flood plain area and are now surrounded by lands in agricultural use. It is often possible to protect these wetlands and to resolve potential conflicts with other land use activities. To protect these wetlands, the County has developed an overlay zone to protect the Identified Wetland

Areas from filling, draining, or other alterations which would degrade their biological value. The majority of the areas containing wetlands are zoned for agricultural use. Activities allowed in this zone will be restricted so as to protect wetland values.

WATER RESOURCES GOALS AND POLICIES.

GOAL:

To protect and maintain the quality of water resources in Columbia County.

POLICIES: It shall be the policy of Columbia County to:

14. Protect marshes, swamps, and other wetlands from filling, draining, or other alterations which would destroy or reduce their biological value.
19. Notify the Oregon Division of State Lands whenever there is an application for permits or other land use decisions affecting wetlands on the inventory.

Finding 47: As previously addressed in Finding 28, the NE Expansion Area's new bicycle staging area within the new 15 acre park may require authorization and approval from the Oregon Department of State Lands (DSL) prior to any site preparation activities since they appear to be in close proximity to the PEMC and PSSC wetlands to the east. The Board finds that DSL approval of any future site improvements will ensure the protection of these valuable water resources is consistent with the Comprehensive Plan's Goals and Policies related to Wetlands and Water Resources. Additionally, the final UGB Expansion moved further away from Jackson Creek that is consistent with the Water Resource Goals and Policies of the Comprehensive Plan.

Continuing with the applicable Parts of the Columbia County Comprehensive Plan related to Open Space, Scenic and Historic Areas and Natural Resources:

ARTICLE XII. OREGON RECREATIONAL TRAILS

Potential and approved recreational trails are identified and addressed in the Recreation section of Comprehensive Plan. To assure coordination with ODOT with regard to the two Oregon Recreation Trails present in the County, the following policies shall be adopted:

POLICIES: It is the policy of the County to:

2. Support efforts to extend the Banks-Vernonia Linear Trail, primarily along the Crown Zellerbach Logging Road right-of-way, from Vernonia to Scappoose and the Multnomah Channel.

PART XVII. RECREATIONAL NEEDS

OREGON RECREATION TRAILS

The National Trails System Act of 1968 gave national recognition to the growing demand for recreation trails, and denoted three types. The natural recreation trails are those located in and near urban areas where there is the greatest need.

Industrial sites should be developed in a manner that is compatible with adjacent recreational opportunities. Industrial development does not mean recreational sites must be eliminated or destroyed. This fact is especially important in relation to the Columbia River, a resource that is coveted by both industry and recreation enthusiasts. Recreation agencies working with the Port of St. Helens and individual enterprises can minimize the loss of recreation opportunities if they can understand each other's needs.

RECREATION GOALS AND POLICIES GOAL:

To satisfy the recreational needs of the citizens of Columbia County and its visitors.

Finding 48: The County Transportation Planner commented on May 10, 2011 and encourages the City to maintain the nature and intent of the original Crown Zellerbach Road as a multi-use trail from West Lane to Honeyman Roads. He states the County will accept the City's intention to utilize their section of the CZ Trail for commercial road purposes provided the trail continues to be separated from the new road and relocated in ways that maintain its present natural woodland environment. Replacing the existing multi-use CZ Trail between West Lane and Honeyman Road with a new sidewalk parallel to the new commercial road will not provide a natural woodland environment for this multi-purpose recreational trail. Similarly, the County will require appropriate provisions to be made that will protect and replace this recreational resource's natural woodland environment prior to the construction of any new commercial connector road between West Lane and Honeyman Roads.

At the June 6, 2011 Public Hearing the City expressed concerns that any future change or relocation of this portion of the CZ Trail would not coincide with the original Memorandum of Understanding (MOU) between the County and the City dated December 18, 1996. In response, the Planning Commission recommended to make this a condition of approval of the UGB Expansion. Condition 1 was revised accordingly and required any relocation of this portion of the CZ Trail follow the original MOU dated December 18, 1996.

The Comprehensive Plan identifies the Crown Zellerbach Trail as an Oregon Recreational Trail. In addition and because this Plan states that industrial sites "should be developed in a manner that is compatible with adjacent recreational opportunities", the county Comprehensive Plan encourages the mutual compatibility of different land uses occurring within close proximity of each another.

This important county and city recreational opportunity should not be detrimentally impacted by its future relocation provided the future commercial/connector road between West Lane and Honeyman Road will follow the 12/18/96 Memorandum of Understanding between the County and the City. The Board finds that this criterion can be satisfied prior to or in conjunction with the construction of any new commercial connector road between West Lane and Honeyman Roads.

Continuing with the Oregon Statewide Planning Goals:

Because OAR 660-024-0020 requires all UGB amendments to be consistent with the Statewide Planning Goals, applicable Goals will now be presented and evaluated.

Goal 1: Citizen Involvement "To develop a citizen involvement program that insures the opportunity for citizens to be involved in all phases of the planning process."
The Board finds that this goal is met through compliance with the land use hearing procedures in the County's acknowledged land use regulations. The intent of Statewide Planning Goal 1 is met.

Goal 2: Land Use Planning "To establish a land use planning process and policy framework as a basis for all decisions and actions related to use of land and to assure an adequate factual base for such decisions and actions." Further, as summarized by the Department of Land Conservation and Development, Goal 2 requires coordination with affected governmental entities, consistency with acknowledged plans, and periodic review and revisions (as needed) to those plans. "Goal 2 also contains standards for taking exceptions to statewide goals. An exception may be taken when a statewide goal cannot or should not be applied to a particular area or situation."

The Board finds that this proposal complies with Goal 2's coordination requirement. The City of Scappoose solicited comments from the County for the proposed Urban Growth Boundary Expansion prior to the City's adoption of said expansion. The City further coordinated with the County prior to submittal of their application to the County. The County notified (45-Day Notice) the Department of Land Conservation and Development of the request on April 26, 2011 and has yet to receive any comments from DLCD as of the date of this report. Other governmental entities, including Scappoose Fire District and the Columbia County Roadmaster were also notified of the request for comments. The Fire District did not submit any objections to the proposal and the comments from the Road Department have been incorporated into this report. Finally, findings throughout this report demonstrate the proposal's consistency with the County's Comprehensive Plan, the Statewide Planning Goals and all applicable State rules and statutes. As such, goal exceptions were not required for the proposed urban growth boundary expansion. The intent of Statewide Planning Goal 2 is met.

Goal 3: Agricultural Lands An exception to Goal 3 is not required by OAR 660-004-0010 (1) (d).

The Board finds that the City used adequate methodology for prioritizing possible industrial lands to bring into the urban growth area, planning for the gap in need for local employment. See the Discussion of priority of land to be included within UGB, Findings 23 and 24. During the review process the City reduced earlier drafts of the Northeast Expansion Area to specifically not include Class II High Valued Farm lands located closer to the Multnomah Channel. Additionally, this site has round river rock located close to the surface which impedes traditional farm equipment, and the farm has been stagnant for years. Even though the Northeast Expansion Area has 266 acres of land zoned Primary Agriculture (PA-80), it is primarily vacant and unused for agricultural crops. For the County and the City to balance the need for airport related employment with farmlands with

minimal farm production, the need for employment is greater, especially airport related jobs.

Goal 4: Forest Lands An exception to Goal 4 is not required by OAR 660-004-0010(1) (d).

Goal 5: Natural Resources, Scenic and Historic Areas, and Open Spaces "To protect natural resources and conserve scenic and historic areas and open spaces." Goal 5 further requires that local governments inventory scenic, historic and open space resources and adopt programs that will conserve these resources for present and future generations. Said resources include, but are not limited to, riparian corridors, including water and riparian areas and fish habitat, wetlands, wildlife habitat, approved Oregon Recreation Trails, natural areas, and wilderness areas. Planning Guidelines as established by Goal 5 specifically state that "the need for open space in the planning area should be determined and standards developed for the amount, distribution and type of open space." Planning Guidelines also encourage the development of open space in urban areas.

The County finds that the properties proposed for inclusion within the City's Urban Growth boundary contain natural resources that need to be protected in accordance with Goal 5. Specifically, there are two areas in the NE Area and include (1) PEMC and PSSC wetlands identified in the WI Map of St. Helens, Oregon are located near the future 15-acre Park and (2) the existing natural wooded environment surrounding the existing Crown Zellerbach multi-use recreational trail located where the City proposes to construct a new commercial road between West Lane and Honeyman Roads. Findings 28, 29, 48 & 49 provide measures that will need to be implemented to ensure these valuable Goal 5 Resources are preserved and protected from the surrounding area's future industrial development. The intent of Statewide Planning Goal 5 is met.

Goal 6: Air, Water and Land Resources Quality "To maintain and improve the quality of the air, water and land resources of the state." Goal 6 requires local governments to designate areas for urban uses only if those areas can be served by sanitary sewer and public water. This Goal also requires governments to buffer and separate land uses which have different impacts on the area's air, water and land resources. The County finds that the City of Scappoose's UGB Expansion will not result in any industrial or commercial development until these uses can be served by the city water, sanitary sewer, storm drainage facilities and transportation systems needed to support them. The intent of Statewide Planning Goal 6 is met.

Goal 7: Areas Subject to Natural Hazards. "To protect people and property from natural hazards." The UGB Expansion has specifically excluded the inclusion of areas associated with Jackson Creek's Floodplain and is consistent with the intent of Statewide Planning Goal 7.

Goal 8: Recreational Needs "To satisfy the recreational needs of the citizens of the state and visitors..." The Board finds that the subject proposal directly supports Goal 8. See Findings 29 and 49 for the discussion on the recreational needs pertaining to the Crown Zellerbach recreational trail. The intent of Statewide Planning Goal 8 is met.

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

The Board finds that the City of Scappoose's proposed UGB expansion is needed to meet their projected 20 Year Employment Need for industrial and commercial development. This 20 Year Employment Need was determined according to Statewide Planning Goal 9 that authorizes cities to review and, if necessary, amend their comprehensive plans if a factual based Economic Opportunities Analysis indicates the existing land supply cannot accommodate the city's economic development goals and opportunities. Statewide Planning Goal 9 is met.

Goal 10: Housing

See Finding 37 to the Columbia County Rural Residential Goals and Policies. The Board finds that the areas considered by the City for reduction of acreage for Rural Residential uses are properties considered less desirable for homes generally in Scappoose. When balancing the need for specific types of employment opportunities, the residential designations would have less priority.

Goal 11: Public Facilities and Services "To plan and develop a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban and rural development." Planning Guideline # 1 for Goal 11 states, "Plans providing for public facilities and services should be coordinated with plans for designation of urban boundaries, urbanizable land, rural uses and for the transition of rural land to urban uses."

Findings 26 and 46 provide discussions concerning the *Scappoose UGB Infrastructure Report's* analysis of the current UGB's existing infrastructure. That report identified potential improvements that would be required before these facilities and services would be able to support the projected future industrial and commercial growth. The report also emphasizes that because these improvements are not included in the city's capital improvement plans, the City anticipates developers to fund the extension of city water, sanitary sewer, storm drainage facilities, and roads to the affected areas and properties. The Board finds that since no industrial or commercial development will occur prior to these extensions the intent of Statewide Planning Goal 11 is met.

Goal 12: Transportation "To provide and encourage a safe, convenient and economic transportation system."

Findings 13 and 45 and their discussions found that although the UGB Expansion does not require an ODOT approved Traffic Impact Analysis (TIS) per the Statewide Planning Rule in OAR 660-012-0060, this analysis will be required prior to any future industrial and/or commercial development. This TIS will need to identify and appropriately address the impacts these future uses will have on Highway 30 and the surrounding street system to ensure an efficient, safe, and diverse transportation system will serve the intended industrial and commercial uses in ways that meet the needs of Columbia County residents and labor force.

The intent of Statewide Planning Goal 12 is met.

Goal 13: Energy Conservation Not applicable

Goal 14: Urbanization, "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."
Statewide Planning Goal 14 (Urbanization) is addressed in Findings 25 - 31 of this report. Columbia County's Urbanization Goal in the Comprehensive Plan was updated in 2009 and directly references the criteria of Goal 14. Statewide Planning Goal 14 is met.

Goal 15-19: Willamette River Greenway, Estuarine Resources, Coastal Shorelands, Beaches and Dunes & Ocean Resources Not applicable

Finding 49: Based on the foregoing, the request to expand the City of Scappoose Urban Growth Boundary is consistent with all applicable Statewide Planning Goals (as discussed above). The Board finds that the criterion is met.

SUPPLEMENTAL FINDINGS IN RESPONSE TO TESTIMONY IN OPPOSITION RECEIVED ON AND AFTER THE BOARD OF COMMISSIONERS' PUBLIC HEARING:

Marie Gadotti: Ms. Gadotti appeared and testified at the Board of Commissioners' July 27, 2011 hearing and submitted written evidence and testimony. Ms. Gadotti testified that she does not object to the Scappoose EOA or the City's identified need to expand its UGB. Rather, Ms. Gadotti objects to the exclusion of her property from the UGB expansion areas. The findings above address much of Ms. Gadotti's objections. Moreover, the issues raised in Ms. Gadotti's testimony and submittals are essentially the same as those raised in opposition to the City's adoption of its Ordinance 816, and are addressed in the City's Findings adopted in support of Ordinance 816. As an additional response, and in an effort to avoid duplication, the County hereby adopts those portions of the City's findings that address Ms. Gadotti's objections, except to the extent that those findings are inconsistent with the Board's findings.

Mike Sheehan: Mr. Sheehan appeared and testified at the Board of Commissioners' July 27, 2011 hearing and submitted written evidence and testimony. The issues raised in Mr. Sheehan's testimony and other submittals are essentially the same as those raised in opposition to the City's adoption of its Ordinance 816, and are addressed in the City's Findings adopted in support of Ordinance 816. In response to Mr. Sheehan's objections, and in an effort to avoid duplication, the County hereby adopts those portions of the City's Findings that address Mr. Sheehan's objections, except to the extent that those findings conflict with the Board's findings.

One Thousand Friends of Oregon: 1000 Friends of Oregon did not testify at the Planning Commission or the Board of Commissioners' hearings, but submitted a letter to the Board dated July 27, 2011. The issues raised in the submittal are essentially the same as those 1000 Friends raised in opposition to the City's adoption of its Ordinance 816, and

are addressed in the City's Findings adopted in support of Ordinance 816 and in a letter received by the County from Johnson Reid dated August 16, 2011. The Board acknowledges that the City has adopted an aggressive employment growth strategy. However, the Board finds that the City's employment forecast is reasonable and consistent with the applicable statutes, goals and rules for the reasons stated in the findings above, as well as the City's findings and the Johnson Reid letter. In an effort to avoid duplication, the County hereby adopts those portions of the City's Findings that address 1000 Friends' objections, except to the extent that those findings conflict with the Board's findings.

Patricia Zimmerman: Ms. Zimmerman testified at the Board of Commissioners' hearing and submitted written evidence and testimony. Ms. Zimmerman objects to the City's employment forecasts and points to the City's population forecast as evidence that that City's employment forecast is unreasonable. However, the statewide planning goals and implementing rules do not require employment growth to match population growth. Scappoose is essentially a bedroom community, and the City's employment goals and forecast reflect the City's decision to reverse that trend. Accordingly, the City has projected an employment growth rate that will exceed its population growth rate. For the reasons stated in the findings above, as well as in the City's findings in support of Ordinance 816, the Board finds that the City's employment forecast is reasonable and consistent with applicable statutes, goals and rules.

City of Scappoose Council Findings – Ordinance No. 816

Docket # CPA1-10/CPTA1-10/DCTA3-10

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Advisory Committee and Planning Commission Recommendations

In July 2008 the Scappoose City Council adopted Resolution 08-10 to establish the Ad Hoc Scappoose Economic Opportunities Analysis Advisory Committee (or more simply, the "Advisory Committee") to provide information for the City to make policy choices on the types of employers to attract and to evaluate the land supply for commercial and industrial development. The Advisory Committee met seven times from December 2008 through May 2010. At its final meeting on May 18, 2010, the Advisory Committee unanimously adopted (with one abstention from an affected property owner) the following motions:

1. *To accept the February 2010 Economic Opportunity Analysis prepared by Johnson Reid.*
2. *To amend page 38 of the February 2010 Economic Opportunity Analysis¹ so the section entitled "Environmental Constraints" reads as follows:*

In order to be suitable, the site should be flat or nearly flat, having a slope of less than 10%. The site must be able to provide appropriately-sized and configured developable areas free of wetlands, floodplains, riparian constraints, or other known environmental constraints which would significantly preclude, delay, or significantly increase the cost of development of all or a portion of the site.

3. *To recommend expansion of the UGB into the northeast to include predominantly Class III soils and southwest to include the exception areas along Old Portland Road. Any unmet employment needs should be held in reserve and considered when the City performs a residential land needs analysis.*
4. *To recommend that the City Council recognize the transportation and employment advantages to the community of future expansion in the southeast quadrant south of Havlik Drive. The Committee recommends that this land be included within the UGB when this area can be justified under Goal 14 and statutory priorities.*

In making its recommendation, the Advisory Committee reviewed the Economic Opportunities Analysis and the documents in the Appendices (some of which have been revised to include additional information). Map A shows the proposed UGB expansion area.

The City submitted a Notice of Proposed Amendment to the Department of Land Conservation and Development on July 22, 2010.

The City of Scappoose Planning Commission met four times between September 9, 2010 and October 28, 2010. At the October 28, 2010 hearing, the Planning Commission adopted the following motion with a 6-1 vote:

¹ This amendment has been incorporated into Attachment A, *Scappoose Economic Opportunities Analysis*

1. *Amend the Comprehensive Plan to incorporate 2010 Scappoose Economic Opportunities Analysis (EOA) and 2010-2030 Columbia County population forecast;*
2. *Remove outdated information from the Comprehensive Plan and add key findings and policies from the Economic Opportunities Analysis;*
3. *Add new airport employment Plan designation and overlay zones to implement the Economic Opportunities Analysis;*
4. *Amend the Scappoose Urban Growth Boundary to meet industrial and commercial needs identified in the Economic Opportunities Analysis and to include a regional park area;*
5. *Remove exception areas Southwest 2 and Southwest 3 from the UGB expansion area;*
6. *Adjust the EOA capture rate to reflect the proper amount of land to correspond just to Southwest 1;*
7. *Preserve Crown Zellerbach trail to the extent possible;*
8. *Amend Chapter 17.136 to add a line for the Airport Employment plan designation to automatically receive Public Use Airport zoning;*
9. *Utilize the October 21, 2010 draft of the Comprehensive Plan proposed amendments and the October 26, 2010 draft of the proposed overlay zones.*

Scappoose City Council Decision

The City Council met five times between December 6, 2010 and April 4, 2011. At the March 7, 2011 hearing, the Council voted 5-2 in favor of the following motion:

Council preliminarily approved Docket # CPA1-10/CPTA1-10/DCTA3-10 as recommended by the Planning Commission, with the following exceptions:

- 1. Utilize the January 10, 2011 draft of the Economic Opportunities Analysis;*
- 2. Update the proposed edits to the existing sections of the Comprehensive Plan to incorporate the January 10, 2011 EOA; and*
- 3. Schedule a Land Use Hearing on April 4, 2011 at City Hall on the matter of amending the UGB to include three parcels north of Gilmore Road that are currently partially within the UGB.*

Council also directed staff to draft an ordinance and supporting findings for adoption at a future meeting.

On April 4, 2011, the City Council held a public hearing regarding incorporating the Gilmore Road parcels into the proposed urban growth boundary, considered proposed findings in support of its preliminary decisions, and voted 4 to 1 in favor of a motion to approve Docket # CPA1-10/CPTA1-10/DCTA3-10 and accept the proposed findings. At that time, Council also moved to approve Ordinance No. 816 and adopt the ordinance at its meeting on April 18, 2011.

Comprehensive Plan and Development Code Amendments: Attachments and Maps

- Attachment A:** *Scappoose Economic Opportunities Analysis* (January 10, 2011)
Attachment B: *Comprehensive Plan Text Amendments*
Attachment C: *Airport Employment Plan Designation*
Attachment D: *Airport Employment Overlay Zones*
Attachment E: *Population Forecasts for Columbia County Oregon, its Cities & Unincorporated Area, 2010 to 2030* (February 2008)
- Map A:** *Urban Growth Boundary Amendment*
Map B: *Urban Growth Boundary Amendment: Northeast Expansion Area*
Map C: *Urban Growth Boundary Amendment & Comprehensive Plan Amendment*

Appendices and Maps

- Appendix 1: Employment Land Need and Supply**
A. *Vacant and Redevelopable Lands* (Winterbrook, January 2010)
B. *Employment Land Need and Supply Summary* (Winterbrook, January 2010)
Map 4: *Scappoose UGB – Suitable Employment Lands* (Winterbrook, May 2010)
- Appendix 2: Scappoose UGB Alternatives Analysis** (Winterbrook Planning, May 2010)
Map 1: *UGB Alternatives – Soil Types* (Winterbrook, May 2010)
Map 2: *UGB Alternatives – Slopes and Soils* (Winterbrook, May 2010)
Map 3: *UGB Alternatives – Floodplain, Slopes, Soils* (Winterbrook, May 2010)
Map 5: *UGB Alternatives – Exception Areas* (Winterbrook, May 2010)
Map 6: *UGB Expansion Alternatives* (Winterbrook, May 2010)
- Appendix 3: Scappoose UGB Amendment Infrastructure Report** (Otak, November 17, 2010)
- Appendix 4: Transportation Studies**
A. *Scappoose UGB Alternatives Transportation Analysis* (DKS, March 11, 2010)
B. *Scappoose UGB Expansion Transportation Impacts* (DKS, March 23, 2010)
- Appendix 5: Scappoose Airport Land Use Concept Plan** (Otak, May 7, 2010)
- Appendix 6: Agency Comments**
A. *Port of St. Helens letter of support dated May 18, 2010*
B. *Scappoose Drainage Improvement Company letter dated August 9, 2010*
C. *Oregon Department of Transportation letter dated September 9, 2010*
D. *Oregon Department of Transportation letter dated September 21, 2010*
E. *Oregon Department of Transportation e-mail message dated September 23, 2010*
F. *Columbia County Department of Land Development Services letter dated December 29, 2010*
- Appendix 7: Supporting materials from City Council Hearings**
A. *Background information on Crown Zellerbach Road* (January 28, 2011)
B. *Clarification on Elements of the City's EOA* (Johnson Reid, March 1, 2011)
C. *Airpark Employment Chart*

Preliminary Statewide Planning Goal Findings

Statewide Planning Goals 1, 2, 5, 7, 8, 9, 11, 12, 13 and 14 are applicable to this request. Because the proposal is to amend the Scappoose Comprehensive Plan and Development Code to meet economic development objectives, findings demonstrating compliance with the Goal 9 (Economy) and Goal 14 (Urban growth boundaries) administrative rules are provided first, followed by findings for remaining applicable statewide planning goals and rules.

- **Goal 9 (Economy of the State)** applies to adoption of local economic studies such as the Scappoose EOA. The Land Conservation and Development Commission (LCDC) adopted the Economic Development administrative rule (OAR Chapter 660, Division 009) to interpret Goal 9 and ORS 197.712.
- **Goal 14 (Urbanization)** governs amendment to urban growth boundaries; the Urban Growth Boundaries administrative rule (OAR Chapter 660, Division 024) provides detailed guidance for making UGB amendments.
- **Goal 1 (Citizen Involvement)** and **Goal 2 (Land Use Planning)** are procedural goals that require citizen involvement in all phases of the planning process; an adequate factual base for considering alternatives courses of action; coordination among the city, county and state agencies; adoption of ultimate policy choices in the Comprehensive Plan; and consistency between the Comprehensive Plan and implementing land use regulations.
- **Goals 5 (Natural Resources), 7 (Natural Hazards) and 8 (Parks and Recreation)** require local governments to address wetland and riparian impacts and to limit development within the 100-year floodplain. Wetland and riparian corridors identified in the City's 1998 Local Wetland Inventory (LWI) are accounted for in the suitable employment lands inventory. A 15-acre regional park (a staging area for bicycle and non-motorized water sports) is proposed in the EOA to respond to the desire to promote tourism in connection with the Crown Zellerbach Trail between Scappoose and Vernonia.
- **Goal 11 (Public Facilities and Services), Goal 12 (Transportation) and Goal 13 (Energy Conservation)** also apply. Goal 12 is implemented by the Transportation Planning Rule (OAR Chapter 660, Division 012).

Statewide Planning Goal 9 (Economy of the State)

The Goal 9 (Economy) rule sets forth standards for conducting an economic opportunities analysis (EOA) and determining the characteristics of employment sites that are required to carry out a community's economic development policies. Johnson Reid prepared the Scappoose EOA in compliance with the Goal 9 administrative rule (OAR Chapter 660, Division 009 – Economic Development).

The purpose of the Goal 9 rule (OAR 660-009-0000) is to:

**** provide an adequate land supply for economic development and employment growth in Oregon *** [and] to link planning for an adequate land supply to infrastructure planning, community involvement and coordination among local governments and the state.*

After an exhaustive analysis, the Scappoose EOA identifies the number, acreage and characteristics of sites that will be needed during the 20-year planning period to attract targeted employment opportunities.

- Otak and DKS studies describe public infrastructure investments that will be needed to support development of existing and proposed employment sites.
- The Advisory Committee encouraged public comments and ensured coordination among local and state governments in the development of the Scappoose EOA.
- The Planning Commission clarified and strengthened the proposed overlay zones to delete certain uses that were deemed inconsistent with the economic development objectives identified in the EOA and to better protect lands for the intended character of the airport industrial areas and the uses defined in the EOA.
- The City Council approved updates to the EOA in response to testimony, creating a more internally-consistent document.

Economic Opportunities Analysis [OAR 660-009-0015]

As required by the Goal 9 rule (OAR 660-009-0015), the Scappoose EOA and supporting technical studies include:

- (1) A review of national, state, regional, county and local trends (EOA, pp. 5-25);
- (2) The identification of required site types based on the site characteristics typical of expected uses (EOA, pp. 37-46);
- (3) An inventory of industrial and other employment lands (Appendix 1.A: *Vacant and Redevelopable Lands* – Winterbrook, January 2010);
- (4) An assessment of community economic development potential (EOA, pp. 23-30); and

- (5) A community economic vision – emphasizing the importance of the Scappoose Industrial Airpark as an economic driver – is discussed in the EOA and confirmed at the January 2010 Advisory Committee meeting. This vision is incorporated into the revised Comprehensive Plan policies in Attachment B.

Industrial and Other Employment Development Policies [OAR 660-009-0020]

OAR 660-009-0020 requires that the EOA and Comprehensive Plan include economic development objectives and policies. The Scappoose EOA provides the basis for proposed policy amendments to the Scappoose Comprehensive Plan. (Attachment B) The Scappoose EOA identifies “aviation manufacturing and service” and “retail” as the two major urban “clusters” in Scappoose. This is consistent with the area’s more than 35-year commitment to attracting new industry with the Scappoose Airport. During that time new companies such as Oregon Aero and Sport Copter have established themselves as attractors of employment and growing businesses, even through a recessionary economy. (Appendix 7.C). The addition of “through the fence” options is known to provide regional airports with an access to global markets. With airports the size of Scappoose, this creates unique competitive advantages. The recent growth of the Aurora Airport exemplifies this type of growth opportunity. Since making substantial improvements in 2002, 12 new companies have located there with 400 new employees. Scappoose believes it can take similar strides here but an expansion of its UGB is necessary to do so.

The EOA identifies five types of targeted employment and corresponding site needs (pp. 26-46):

- Industrial (Airport Related and Airport Compatible)
- Office / Service Commercial
- Retail Commercial
- Overnight Lodging
- Institutional / Public (Airport)

Plan policies seek to redress the existing imbalance between employment (which is relatively low) and population (which is relatively high). Revised Comprehensive Plan policies encourage the provision and protection of an adequate supply of suitable and serviceable sites to accommodate targeted employment opportunities. Plan policies also encourage intensification and redevelopment of commercial land in the downtown core area and along Highway 30.

Designation of Lands for Industrial and Other Employment Uses [OAR 660-009-0025]

OAR 660-009-0025 requires designation of employment sites consistent with the policy direction found in the EOA and Comprehensive Plan:

- (1) The Scappoose EOA and revised Comprehensive Plan identify the approximate number, acreage and characteristics of sites needed to accommodate industrial, office and retail

commercial, overnight lodging and public / institutional uses. Updates to the EOA during the City Council process resulted in some minor modifications to development types and corresponding site and acreage requirements necessary to meet identified 20-year airport-related, industrial, commercial, lodging and institutional needs. These development types are described more fully in the Goal 14 findings:

Commercial (Land Need = 104 Acres). After accounting for existing vacant (24 acres) and redevelopable (7 acres) commercial land within the UGB, there is an unmet need for about 73 acres. This deficit can be met in the following ways:

- a. **Mixed Use Employment** (office, service, limited retail in a Business Park setting) – approximately 50 acres within the existing UGB, in the Airport Business Park (ABP) overlay zone as shown on Figure 17.74.1 within Attachment D.
- b. **Lodging (including lodging-related commercial)** – approximately 5 acres within the current PUA zone.
- c. **Intensification of Existing Commercial land uses** – approximately 5 acres of the need for commercial land will be met through further intensification of existing developed areas, generally in the downtown area.
- d. **Highway Commercial / Office** – approximately 13 acres for a retail auto-oriented commercial area outside the UGB with direct access to US 30. As part of this action, 5 net acres along Old Portland Road are proposed to be added to the UGB with a Commercial plan designation, leaving 8 net acres for future allocation.

Airport Related Uses (Need = 144 Acres). Additional land is needed and should be reserved specifically for airport-related employment and semi-public uses **adjacent to the airport.**

- a. **Airport Industrial Park** (business park employment uses that *require* access to airport runway via taxiways) – approximately 54 acres in the Airport Industrial Park (AIP) overlay, within the existing UGB, as shown on Figure 17.74.1 within Attachment D.
- b. **Runway Reserve** (south of existing runway) – approximately 50 contiguous acres outside the UGB.
- c. **Hangar Reserve** (requested by the Port of St. Helens east of runway) – approximately 40 contiguous acres outside the UGB.

Industrial (Need = 215 Acres). Industrial Need is identified as 130 Acres for Medium and Large Sites (one 30 and two 50-acre sites), and 85 acres for Small Sites (typically ~7 acres) located on relatively poor quality agricultural soils.

- a. **Small site industrial need:** the existing UGB has about 153 vacant suitable industrial acres. Some 104 acres are proposed for mixed and airport-related uses in the PUA zone (see above), leaving 49 vacant suitable industrial acres within the UGB for

small-site industrial uses. There is a deficit of about 36 acres (85 acre need less 49 acre supply) for small site industrial uses that can be met on approximately 5-6 small sites outside the UGB. Comprehensive plan policies call for **clustering of industrial employment opportunities adjacent to existing industrial areas.**

- b. **Regional Large-Site Industrial** (approximately 3 large sites are needed to accommodate uses that require sites of 30 to 50 acres) – approximately 130 acres (one 30-acre site and two 50-acre sites) outside the UGB.

Institutional (Need = 20 acres), Portland Community College – approximately 20 acres are needed.

In addition to meeting the specific locational requirements listed above, all employment uses require the following site characteristics:

- **Topography:** sites must be **flat** (< 10% slope) and **suitable** (free of wetlands, floodplains and riparian constraints).
- **Proximity:** employment sites must have direct access to an existing or planned collector² street without driving through established or planned residential areas.
- **Site Size and Configuration:** site must be large enough and appropriately shaped to accommodate efficiently planned large site users and development types.
- **Compatibility:** sites must not abut urban residential areas on more than one side and must include sufficient land, natural or artificial features to provide effective buffers.
- **Serviceability:** sites must be serviceable in the short- to intermediate-term (within 5-10 years) with transportation, sanitary sewer, water, and storm drainage facilities. Electric service is an important consideration for many targeted industrial firms.
- **Agricultural Land Impacts:** as required by ORS 197.298 Priorities for urban growth boundary expansion and Goal 14 (Urbanization) location criterion 4 (agricultural land compatibility) sites must have: (a) **relatively poor agricultural soils** (rural exception areas near Scappoose's UGB do not have required parcel size, topographical and proximity characteristics required to meet identified needs); and should have (b) **natural or artificial boundaries from adjacent agricultural land** (such as arterial roads, rural exception areas, or riparian corridors).

(2) Scappoose EOA Figure 3: Employment Land Demand by Site Size for Scappoose (2030) identifies employment site needs from 2010-2030. A total of 53 sites and 483 acres are needed to meet the site requirements of targeted employment, airport and institutional uses. Required site characteristics are described in the EOA (pp. 37-46).

(3) Employment land within the Scappoose City Limits (immediately west of the Scappoose Industrial Airpark) and within the City Limits along Highway 30 is considered immediately

² Highway 30 is the only designated arterial street within the Scappoose UGB or proposed expansion areas.

serviceable and ready for development. Thus, more than half of Scappoose's existing employment sites are serviced and ready for development in the short-term.

(4) Appendix 3 includes a review of the City's sanitary sewer, water and storm drainage master plans and identifies needed upgrades through the 20-year planning period. Appendix 4 identifies probable transportation improvements needed to accommodate planned employment growth. Scappoose is committed to continuing to provide at least 25% of its long-term employment land supply for short-term use.³ This means that at any given period, at least 100 suitable acres must have urban services, or must be serviceable within a one-year period. Most of the vacant and redevelopable employment land within the existing limits meets this standard.

(5) The Scappoose Airport Land Use Concept Plan (Appendix 5) identifies a potential 20-acre site for future community college use in a broader area with an AE plan designation. The exact location of this potential institutional use may change.

(6) The Scappoose EOA (p. 40) and Appendix 1.B *Employment Land Need and Supply Summary* explicitly consider land use compatibility as a required site characteristic for employment land:

- "Employment sites must have direct access to an existing or planned collector street without driving through established or planned residential areas."
- "Sites must not abut urban residential areas on more than one side and must include sufficient land, natural or artificial features to provide effective buffers."

Moreover, Industrial Policy 3 of the Scappoose Comprehensive Plan requires clustering of industrial uses to minimize residential impacts.

(7) The EOA did not specifically consider the short-term availability of suitable sites. However, the Port of St. Helens and private landowners are actively marketing several parcels inside the UGB.⁴

(8) Proposed amendments to the Scappoose Comprehensive Plan and Development Code establish the Airport Employment (AE) plan designation, implemented by the Public Use Airport (PUA) and three implementing overlay zones. The overlay zones – Airport Business Park (ABP), Airport Industrial Park (AIP) and East Airport Employment (EAE):

(a) Identify sites suitable for proposed industrial uses in the UGB expansion area; (b) Protect

³ 10) "Short-term Supply of Land" means suitable land that is ready for construction within one year of an application for a building permit or request for service extension. Engineering feasibility is sufficient to qualify land for the short-term supply of land. Funding availability is not required. "Competitive Short-term Supply" means the short-term supply of land provides a range of site sizes and locations to accommodate the market needs of a variety of industrial and other employment uses." (OAR 660-009-0005)

⁴ Note: This is a suggestion in the Goal 9 rule, not a requirement.

sites suitable for the proposed industrial uses by limiting land divisions and permissible uses and activities that interfere with development of the site for the intended use; (c) protect sites for the proposed industrial uses by restricting incompatible uses on adjacent and nearby lands (the AE designation abuts the airport to the west and agricultural land or a gravel quarry to the north, east and south); and (d) provide applicable overlay zones to meet identified employment needs within the UGB.

Goal 9 Conclusion

For the reasons stated above and based on information found in the Scappoose EOA and accompanying Winterbrook and Johnson Reid memoranda, the proposed Comprehensive Plan amendments comply with Goal 9.

Statewide Planning Goal 14 Urbanization

The standards for amending an urban growth boundary (UGB) are found in Statewide Planning Goal 14 (Urbanization)⁵ and in ORS 197.298 Priorities for urban growth boundary amendments. The Goal 14 rule (OAR Chapter 660, Division 024) interprets and clarifies the more general language of Goal 14 and explains the relationship between statutory "priorities" and Goal 14 "location factors." In the Goal 14 rule findings below, *text shown in italic is quoted directly from the referenced goal, rule or statute.*

As noted in Goal 14:

In determining need, local government may specify characteristics, such as parcel size, topography or proximity, necessary for land to be suitable for an identified need. Prior to expanding an urban growth boundary, local governments shall demonstrate that needs cannot reasonably be accommodated on land already inside the urban growth boundary.

As noted in the Goal 9 discussion above, the Scappoose EOA, the Scappoose Comprehensive Plan and Winterbrook memoranda (Appendix 1) identify specific parcel size, topographical and proximity requirements for targeted employment types.

Land Need [OAR 660-024-0040]

Employment Land Need Only [OAR 660-024-0040(1)]

(1) A local government may review and amend the UGB in consideration of one category of land need (for example, housing need) without a simultaneous review and amendment in consideration of other categories of land need (for example, employment need).

Council Findings: This proposal is limited to employment land need.

Determination of 20-Year Employment Land Need [OAR 660-024-0040(5)]

(5) The determination of 20-year employment land need for an urban area must comply with applicable requirements of Goal 9 and OAR chapter 660, division 9, and must include a

⁵ "**Land Need** Establishment and change of urban growth boundaries shall be based on the following: (1) Demonstrated need to accommodate long range urban population, consistent with a 20-year affected local governments; and (2) Demonstrated need for housing, employment opportunities, livability or uses such as public facilities, streets and roads, schools, parks or open space, or any combination of the need categories in this subsection (2). In determining need, local government may specify characteristics, such as parcel size, topography or proximity, necessary for land to be suitable for an identified need. Prior to expanding an urban growth boundary, local governments shall demonstrate that needs cannot reasonably be accommodated on land already inside the urban growth boundary."

determination of the need for a short-term supply of land for employment uses consistent with OAR 660-009-0025.

Council Findings: The Scappoose EOA (Johnson Reid, January 2011) complies with the applicable requirements of Goal 9 and its administrative rule, as documented in the EOA itself and in the Goal 9 findings above. The determination of short-term need and long-term need are discussed in the OAR 660-009-0025 findings. As documented in Goal 9 findings, the Scappoose EOA identifies a long-term *employment* need of about 393 suitable acres; the EOA identifies an additional 90-acre need for airport related facilities such as a potential airport runway extension and hangars.

The employment projection in the Scappoose EOA serves *as part* of the justification for the City's determination of the number of sites and required characteristics needed to maintain and attract targeted employment opportunities. However, Scappoose used a "site needs approach," based on Johnson Reid's expertise, to determine the number of sites and their required characteristics – as called for in ORS 197.712(2)(c)⁶ and the Goal 9 Rule.

The Scappoose EOA recommends capitalizing on the community's comparative advantages to provide the opportunity for employment growth:

The City has maintained exceptional growth during the last six years and although some of that growth has been eroded recently, the area has held up well. Despite a nationwide severe recession, Columbia County maintained a 1.6% growth rate between 2007 and 2008.

Scappoose's success is due in part to its distinct location, which offers both close proximity to Portland and Hillsboro as well as a convenient route to by-pass Portland in order to reach Interstate 5 to the north through Longview. In addition, Scappoose is uniquely connected to the Columbia River as well as a regional airport, which is expected to be the next expansionary airport as Portland International Airport (PDX) and the Hillsboro airport confront both congestion and residential encroachment.

⁶ "197.712 * * * the Legislative Assembly finds and declares that, in carrying out statewide comprehensive land use planning, the provision of adequate opportunities for a variety of economic activities throughout the state is vital to the health, welfare and prosperity of all the people of the state. (2) By the adoption of new goals or rules, or the application, interpretation or amendment of existing goals or rules, the Land Conservation and Development Commission shall implement all of the following: (a) Comprehensive plans shall include an analysis of the community's economic patterns, potentialities, strengths and deficiencies as they relate to state and national trends. (b) Comprehensive plans shall contain policies concerning the economic development opportunities in the community. (c) **Comprehensive plans and land use regulations shall provide for at least an adequate supply of sites of suitable sizes, types, locations and service levels for industrial and commercial uses consistent with plan policies.** (d) Comprehensive plans and land use regulations shall provide for compatible uses on or near sites zoned for specific industrial and commercial uses. (e) A city or county shall develop and adopt a public facility plan for areas within an urban growth boundary containing a population greater than 2,500 persons. The public facility plan shall include rough cost estimates for public projects needed to provide sewer, water and transportation for the land uses contemplated in the Comprehensive Plan and land use regulations. Project timing and financing provisions of public facility plans shall not be considered land use decisions." [Emphasis added.]

Some firms will find the location unsuitable—particularly the high-tech firms that require seismically stable land. Scappoose lies on deep gravel beds, not bedrock. It will not attract those firms. But many other firm types will find Scappoose an attractive location. The ability of Scappoose to attract employers depends on its ability to provide basic urban infrastructure to sites meeting the following criteria:

- Large acreage, best if a mix of sizes is available, ranging from 30 to 50 acres
- Flat topography
- Regular shape, such as a square or rectangle
- No environmental contamination
- Relatively free of wetlands
- Industrially zoned
- Direct access to Highway 30, along an uncongested road with no tight turns
- Direct freight rail access
- Airport

Second, much of Scappoose's potential is due to external factors related to its proximity to the Portland metro area and Hillsboro. Johnson Reid conducted interviews with representatives from the Oregon Business Development Department (OBDD) to identify the regional factors that affect economic development in Scappoose. OBDD staff reported the following factors that will affect Scappoose's long-term potential:

- Oregon has a scarcity of large industrial sites, specifically sites 100 acres or greater.
- The great majority of firms seeking to locate in Oregon are searching for a site between 10 and 200 acres. About half the firms require a site between 10 and 50 acres and another third require a site between 50 and 200 acres.
- Industrial parcels of versatile size and reasonable development cost have grown scarce in the Willamette Valley near Interstate 5, particularly in the Portland metro area. The decision by Walmart to locate its distribution center in Hermiston, for example, was driven in part by the issue of industrial land availability with excellent transportation access and reasonable cost.
- OBDD has been turning away firms with interest in locating in Scappoose because the City lacks large, shovel-ready sites.
- Currently, much of Scappoose's potential is connected to the aviation industries clustering at the Scappoose Industrial Airpark. These industries typically need large sites due to the large components with which they work as well as need for staging and future development. The Airpark benefits from both available Port locations and private lands with potential "through the fence" access to the airport.

Metro's recently prepared Urban Growth Report and associated research reveal an undersupply of large industrial lots in the Metro region.⁷ A review by Johnson Reid of all employment parcels included in the published inventory, regardless of parcel ratings as established by Metro, indicates the following:

Size	Gross Acreage	Net Buildable Acreage
Median	2.2	1.8
Mean	4.9	4.0
Modal 1/	1.05	0.9

1/ Modal size refers to the most common size available

In other words, the vast majority of the employment land inventory—regardless of quality rating—as published, is predominantly very small and unsuitable for the vast majority of industrial land development types regardless of potential FAR realized on site. In short, the Metro region lacks large industrial lots. Moreover, it seems that

⁷ See Metro's report at http://library.oregonmetro.gov/files/3b-urban_growth_report.pdf

Metro has adopted policies which may exacerbate Portland's lack of industrial land. In the UGR report, Metro concluded the following:

"The current employment demand forecast and the analysis of employment capacity within the UGB do not indicate a need to add land to the boundary for industrial or non-industrial purposes at the regional level to meet statutory requirements to ensure sufficient capacity to support the region's forecasted employment at the low end of the demand range. However, the analysis does show a need for additional capacity through investments, policy changes, or expansions to support the high end of the demand range for non-industrial employment. Further analysis of preferences for large lots and the current inventory results in a small potential gap in the land needed to support current preferences for large lot formats for single and multi-tenant users."

If the Metro area does not expand its UGB, the implication for Scappoose is that there will be some spillover demand for large industrial sites within the UGB, giving Scappoose an opportunity to capture considerable spillover growth from the Portland metro area. As Scappoose is not part of Metro's jurisdiction, but is part of the Portland regional economy, the City is well placed to provide the large land types that Metro has limited. Other cities similar to Scappoose such as Cornelius, Forest Grove, Wilsonville, and Gresham all have a limited ability to accommodate these large users because they lie within Metro's UGB.

The Council heard testimony questioning the EOA's projected employment growth, and asked for more clarification on this issue. As explained in the Johnson Reid memorandum titled "Clarification on Elements of the City's EOA" (March 1, 2011, Appendix 7.B):

An average annual employment growth rate of 7.6% was projected for the City of Scappoose. As a stand-alone estimate, ignoring the City's regional context, we would agree that this rate of growth would be implausible to assume. The projections are defensible though in light of the City's geographic position within the Portland-Vancouver Principal Metropolitan Statistical Area (PMSA).

- The broader regional economy is projected to add close to 500,000 jobs over the next twenty years, and the projected 8,069 jobs contained in the EOA would represent a 1.7% share of regional growth.
- Metro, the regional governmental agency that controls many of the jurisdictions within the Oregon portion of the Portland-Vancouver metro area, has modeling that anticipates a substantial share (25%) of projected new employment growth will locate outside of the UGB they control, primarily to satellite communities such as Scappoose, North Plains, Newberg. The model assumed 25% will locate outside of the Metro area boundaries. The employment forecast in the EOA reflects a 7.0% to 9.5% share of the growth assumed to be captured outside of the Metro UGB.
- The forecast was not "artificially created", but derived through evaluation of the City's current and prospective role within the broader region and detailed evaluation of targeted industries. The numbers reflect the aspirational yet reasonable and defensible goals of the City as developed with the Technical Advisory Committee (TAC) over an extended period of outreach.

The Council finds the employment growth figures reasonable in light of local historical growth trends, the regional context of the employment projection, and increased employment opportunities near the airport as a result of the proposed UGB expansion.

Inventory of Suitable and Vacant Employment Land [OAR 660-024-0050(1)]

(1) When evaluating or amending a UGB, a local government must inventory land inside the UGB to determine whether there is adequate development capacity to accommodate 20-year needs determined in OAR 660-024-0040. For employment land, the inventory must include suitable vacant and developed land designated for industrial or other employment use, and must be conducted in accordance with OAR 660-009-0015.⁸

Council Findings: Appendix 1.A *Vacant and Redevelopable Lands* presents the suitable lands data and map. The focus of this topographically suitable⁹ lands analysis is vacant or redevelopable land planned for Commercial or Industrial use. This suitable lands analysis is a summary of “vacant” and “developed” commercial and industrial lands as defined in the Goal 9 administrative rule.¹⁰

The results are shown visually in Appendix 1, Map 4 *Suitable Employment Lands*. As shown on Tables 1 and 2, Winterbrook identified a total of 10 Industrial tax lots comprising 153 topographically-suitable vacant and developed (redevelopable) acres, and 18 Commercial tax lots comprising 31 topographically-suitable vacant and developed (redevelopable) acres.

Table 1: Industrial Vacant and Developed (Redevelopable) Land Supply

Size	Number of Tax Lots	Total Topo-Suitable Acres
1 to 5 Acres	3	9
5 to 20 Acres	5	54
20 to 40 Acres	1	30
40 Acres +	1	60
Totals	10	153

⁸ (8) “Suitable vacant and developed land” describes land for employment opportunities, and has the same meaning as provided in OAR 660-009-0005(1) for “developed land,” section (12) for “suitable,” and section (14) for “vacant land.” [OAR 660-024-010(8)]

⁹ OAR 660-009-005(12) defines “Suitable” as “serviceable land designated for industrial or other employment use that provides, or can be expected to provide the appropriate site characteristics for the proposed use.”

¹⁰ OAR 660-009-005(14) defines Vacant Land as “a lot or parcel: a) Equal to or larger than one half-acre not currently containing permanent buildings or improvements; or b) Equal to or larger than five acres where less than one half-acre is occupied by permanent buildings or improvements.” OAR 660-009-005(1) defines Developed Land as “non-vacant land that is likely to be redeveloped during the planning period”.

Table 2: Commercial and Developed (Redevelopable) Land Supply

Size	Number of Lots	Total Topo-Suitable Acres
1 to 5 Acres	15	14
5 to 20 Acres	3	17
20 to 50 Acres	0	0
50 Acres +	0	0
Totals	18	31

Land Inventory and Response to Deficiency [OAR 660-024-0050]

Capacity of the UGB to Meet Employment Land Needs [OAR 660-024-0050(4)]

If the inventory demonstrates that the development capacity of land inside the UGB is inadequate to accommodate the estimated 20-year needs determined under OAR 660-024-0040, the local government must amend the plan to satisfy the need deficiency, either by increasing the development capacity of land already inside the city or by expanding the UGB, or both, and in accordance with ORS 197.296 where applicable. Prior to expanding the UGB, a local government must demonstrate that the estimated needs cannot reasonably be accommodated on land already inside the UGB. If the local government determines there is a need to expand the UGB, changes to the UGB must be determined by evaluating alternative boundary locations consistent with Goal 14 and OAR 660-024-0060.

Council Findings: The Goal 14 Rule requires that cities look first to employment land within the existing UGB to meet identified employment needs. As discussed in the January 26, 2010 Advisory Committee meeting, indicated in Appendix 1.A (*Vacant and Redevelopable Lands*, Winterbrook January 2010), and described by Appendix 1.B (*Employment Land Need and Supply Summary*, Winterbrook January 2010)¹¹ over half (189 suitable acres) of the City's long-term employment land needs can be met within the existing UGB. After accounting for suitable land within the existing UGB, there is an unmet need for:

- About 13 acres for highway commercial and office uses;
- Three large industrial sites (two 50+ acre sites and one 30+ acre site);
- About 41 acres for smaller industrial sites of 2-10 acres in size; and
- An airport runway extension and hangar facilities (about 90 acres).

¹¹ Appendix 1.B supply figures remain accurate. However, employment land demand decreased by about 16 acres in the January 2011 version of the EOA, due to internal inconsistency corrections requested by Council. The supply and demand figures in these findings have been updated to reflect the January 2011 EOA.

The following summary reflects the January 2011 updates to the EOA. This information explains how the gross suitable acreage need identified in the Scappoose EOA categories (commercial retail / office / lodging, industrial, public) will be accommodated on vacant and redevelopable employment lands within and immediately outside the Scappoose UGB.

Commercial (Land Need = 104 Acres). After accounting for existing vacant (24 acres) and redevelopable (7 acres) commercial land within the UGB, there is an unmet need for about 73 acres. This deficit can be met in the following ways:

- a. **Mixed Use Employment** (office, service, limited retail in a Business Park setting) – approximately 50 acres within the existing UGB, in the Airport Business Park (ABP) overlay zone as shown on Figure 17.74.1 within Attachment D.
- b. **Lodging (including lodging-related commercial)** – approximately 5 acres within the current PUA zone.
- c. **Intensification of Existing Commercial land uses** – approximately 5 acres of the need for commercial land will be met through further intensification of existing developed areas.
- d. **Highway Commercial / Office** – approximately 13 acres for a retail auto-oriented commercial area outside the UGB with direct access to US 30. As part of this action, 5 net acres along Old Portland Road are proposed to be added to the UGB with a Commercial plan designation, leaving 8 net acres for future allocation.

Airport Related Uses (Need = 144 Acres). Additional land is needed and should be reserved specifically for airport-related employment and semi-public uses **adjacent to the airport.**

- a. **Airport Industrial Park** (business park employment uses that *require* access to airport runway via taxiways) – approximately 54 acres in the Airport Industrial Park (AIP) overlay, within the existing UGB, as shown on Figure 17.74.1 within Attachment D.
- b. **Runway Reserve** (south of existing runway) – approximately 50 contiguous acres outside the UGB.
- c. **Hangar Reserve** (requested by the Port of St. Helens east of runway) – approximately 40 contiguous acres outside the UGB.

Industrial (Need = 215 Acres). Industrial Need is identified as 130 Acres for Medium and Large Sites (one 30 and two 50-acre sites), and 85 acres for Small Sites (typically ~7 acres) located on relatively poor quality agricultural soils.

- a. **Small site industrial need:** the existing UGB has about 153 vacant suitable industrial acres. Some 104 acres are proposed for mixed and airport-related uses in the PUA

zone (see above), leaving 49 vacant suitable industrial acres within the UGB for small-site industrial uses. There is a deficit of about 36 acres (85 acre need less 49 acre supply) for small site industrial uses that can be met on approximately 5-6 small sites outside the UGB. Comprehensive plan policies call for **clustering of industrial employment opportunities adjacent to existing industrial areas.**

b. **Regional Large-Site Industrial** (approximately 3 large sites are needed to accommodate uses that require sites of 30 to 50 acres) – approximately 130 acres (one 30-acre site and two 50-acre sites) outside the UGB.

Institutional (Need = 20 acres). Portland Community College – approximately 20 acres outside the UGB are needed.

Table 3 below compares employment site need and the supply of vacant and redevelopable employment land within the existing Scappoose UGB.

Table 3: Total Unmet Employment Need = 294 Suitable Acres with Required Site Characteristics

LAND USE	IDENTIFIED NEED	SUPPLY INSIDE UGB	REDESIGNATE TO MEET NEED INSIDE UGB	UNMET NEED
Office / Retail / Lodging	104 Acres	31 Acres Commercial 5 Acres PUA 5 Acres Commercial Intensification	50 Acres Airport Business Park (ABP)	13 Acres Highway Commercial/Office
Airport Related	144 Acres	0 Acres	54 Acres Airport Industrial Park (AIP)	50 Acres Runway Extension 40 Acres Hangars
Industrial	215 Acres	44 Acres after ABP (-50) and AIP (-54)	0 Acres	171 Acres: Large Sites = 130 Acres (two @ 50 + one @ 30) Small Sites = 41 Acres (~2-10 acres)
Institutional	20 Acres	0 Acres	0 Acres	20 Acres (PCC Site)
Total	483 Acres	85 Acres	104 Acres	294 Acres

Table 3 shows that Scappoose needs 483 suitable acres in a variety of site sizes over the next 20 years. Scappoose is using both options to meet identified employment land needs:

- The City is relying on land within the UGB to accommodate 189 acres of identified land need. Vacant and redevelopable land (as defined in the Goal 9 rule) within the UGB to

meet the need for 184 acres; in addition, the City is assuming that another 5 acres of need will be met through intensification of land uses in the downtown area.¹²

- After accounting for redevelopment and intensification of employment land within the UGB, it was determined that UGB expansion is required to meet the remaining employment-based need for 294 suitable acres.

The Council heard extensive testimony regarding unsuitability of retail commercial near the airport. This concern was based on the "Airport Business Park" (ABP) overlay zone, and allocation of some commercial employment to that overlay zone. However, retail commercial uses are highly limited in the ABP zone – only retail uses 5,000 square feet or smaller are permitted outright, with a maximum size of 20,000 square feet as a conditional use. The only retail commercial anticipated in this area would serve local employees (e.g., a snack shop). The commercial employment uses anticipated in this area are typical of business parks – primarily office and service uses compatible with and supportive of light industrial. These are uses that don't require high visibility as they are not dependent on attracting drive-by customers. All of the retail commercial acreage determined to be needed by the EOA was allocated to existing commercial areas along Highway 30, or within the proposed commercial expansion area to the southwest (also along Highway 30).

The Council heard concerns that the proposed overlay zones would allow uses that would be detrimental to the airport. However, the Port of St. Helens and the Federal Aviation Administration have reviewed the overlay zones and informed the City through the UGB amendment process that they are comfortable with them (Appendix 6.A).

During the public hearings stage it was brought to the City's attention that there are three parcels fronting Highway 30 near its intersection with Gilmore Road where a portion of each parcel lies within the Urban Growth Boundary and a portion of each parcel lies outside the UGB.

Testimony was received at City Council hearings from the owner of one of these parcels (at the corner of Gilmore Road and Highway 30), who stated that the UGB ran through his parcel, with the eastern portion of the property inside the UGB and the western portion outside the UGB. The adjoining two parcels to the north are also divided by the UGB.

According to a letter from Columbia County (Appendix 6F), the County identified all three of the above parcels as exception lands (due to their previous commitment to commercial uses) when the County Comprehensive Plan was adopted in 1971.¹³ Further research indicates that the County Assessor assigned two separate tax lot numbers to each of the three parcels due to their locations straddling adjoining tax maps. The entirety of these three parcels could have been

¹² The Advisory Committee also recommended holding any excess employment need in reserve rather than expanding the UGB to include the northwest exception area.

¹³ As a result, Council could add these parcels in full to the UGB without taking an exception to resource use.

included in the UGB when the City amended it in 1992 to include the eastern portion of these parcels. The City concludes that the assignment of multiple tax lot numbers and the division of these parcels onto two maps for assessment purposes led to an oversight when the City amended the UGB if it had been assumed that the parcel boundaries coincided with the tax map boundaries.

A current assessment of these three parcels for the purposes of an industrial and commercial lands inventory reveals that the portions both within and outside the UGB are already developed with commercial uses. They are served by urban levels of utilities and services. As a result, including the portions of these parcels presently outside the UGB within the UGB would have no net effect on the 20-year land supply. In other words, they would not satisfy an identified need for employment land. Although the western portions of the parcels are not capable of satisfying a portion of the 20-year land need, from a land development and efficient urbanization perspective it doesn't make sense to exclude the western portion of these parcels from the UGB.

The Council desires to rectify this irregularity by amending the UGB to include the entirety of these parcels within the UGB. This action would remedy prior oversights and would provide uniformity to allow for application of efficient and logical development standards as use of the parcels evolves in the future.

Application of Employment Designations [OAR 660-024-0050(6)]

When land is added to the UGB, the local government must assign appropriate urban plan designations to the added land, consistent with the need determination. The local government must also apply appropriate zoning to the added land consistent with the plan designation or may maintain the land as urbanizable land until the land is rezoned for the planned urban uses, either by retaining the zoning that was assigned prior to inclusion in the boundary or by applying other interim zoning that maintains the land's potential for planned urban development. The requirements of ORS 197.296 regarding planning and zoning also apply when local governments specified in that statute add land to the UGB.

Council Findings: A new "Airport Employment" plan designation and implementing PUA base zone, with three overlay zones are proposed for land near the airport (Attachments C and D). This designation and zones reference the Scappoose EOA to determine permitted employment uses and to ensure retention of large lot sizes on land added to the UGB.

- These overlay zones will not be applied until ODOT has approved a transportation impact study to address TPR requirements (Appendix 6.C-6.E). In the meantime, the land will be held in the existing Exclusive Farm Use (EFU) zone which prohibits urban development and land divisions.

- The overlay zones require approval of a master development plan prior to development approval. The master plan must show a connecting north-south collector street, how road and taxiway access will be provided, and how large lots will be retained as called for in the EOA and by plan policies.
- Otak prepared a Land Use Concept Plan (Appendix 5) to show how large and smaller site industrial needs can be met on this site, where the airport runway could be extended as requested by the Port, the location of internal roads and taxiways, and where an institutional site (for Portland Community College) may be provided. Finally, the concept plan also shows a recreational staging area requested by the Advisory Committee.

ORS 197.296 does not apply to Scappoose because the City has a population below 25,000 and is outside the Portland UGB.

Boundary Location Alternatives Analysis [OAR 660-024-0060]

Goal 14 includes requirements for conducting an alternatives analysis to determine where UGBs can be expanded. However, Goal 9 requires local governments to identify the site characteristics (size, topography and proximity) required by targeted employment types. Recognizing the importance of providing employment sites that meet identified site requirements, Goal 14 allows local governments to specify such needed site characteristics before examining alternatives:

In determining need, local government may specify characteristics, such as parcel size, topography or proximity, necessary for land to be suitable for an identified need.

The Goal 14 rule has a similar provision:

Required Site Suitability Characteristics [OAR 660-024-0060(5)]

If a local government has specified characteristics such as parcel size, topography, or proximity that are necessary for land to be suitable for an identified need, the local government may limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298.

OAR 660-024-0060(5) allows “specified characteristics necessary for an identified need” to be used in evaluating alternative areas. *Accordingly, land that does not meet these siting characteristics does not need to be evaluated in the analysis.*

As described in the EOA and the Scappoose Comprehensive Plan, all targeted employment uses require the following site characteristics:

- (1) Topography: sites must be
 - a. Flat (< 10% slope)
 - b. Suitable (free of wetlands, floodplains and riparian constraints)

- (2) Proximity: employment sites must have direct access to an existing or planned collector street without driving through established or planned residential areas
- (3) Site Size and Configuration: site must be large enough and appropriately shaped to accommodate efficiently planned large site users and development types
- (4) Compatibility (industrial): sites must not abut urban residential areas on more than one side and must include sufficient land, natural or artificial features to provide effective buffers, and must be clustered with other industrial land uses.
- (5) Serviceability: sites must be serviceable in the short- to intermediate-term (within 5-10 years) with transportation, sanitary sewer, water, and storm drainage facilities. Electric service is an important consideration for many targeted industrial firms.

In addition to the general requirements:

- 1) Airport-related uses requiring runway access must be adjacent to the airport; and
- 2) Highway commercial areas must have access within ¼ mile of the Highway and be visible from the Highway.

In presenting alternatives to the Advisory Committee, Planning Commission, and City Council, Winterbrook Planning first identified required site characteristics of targeted employment types, and then applied these characteristics systematically to each priority category of land prescribed by ORS 197.298.

Boundary Location

The location of the urban growth boundary and changes to the boundary shall be determined by evaluating alternative boundary locations consistent with ORS 197.298 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; and (4) Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB.

Again, the Goal 14 rule makes it clear that ORS 197.298 Priorities for urban growth boundary expansion must be considered first in this process. To evaluate land for consistency with ORS 197.298 Priorities and Goal 14 location factors, Winterbrook Planning considered four study areas outside the existing Scappoose UGB. As shown in Appendix 2, on Maps 1-3 and 5-6, Winterbrook looked at lands within a mile of the existing UGB, in every direction.¹⁴ These lands were broken into four study areas:

- Study Area 1 – Northwest
- Study Area 2 – Northeast

¹⁴ Land within and beyond the Multnomah Channel and Columbia River was not included in the study areas.

- **Study Area 3 – Southeast**
- **Study Area 4 – Southwest**

The following areas have been described and mapped as indicated below:

Study Area 1 – Northwest of the existing UGB, bounded on the southwest by Scappoose-Vernonia Highway, and on the east by Highway 30. Study Area 1 contains a small (11 acres) unconstrained (by slopes or floodplain) residential exception (non-farm and non-forest) area at the intersection of Wikstrom Road and Highway 30, as well as some large, flat, unconstrained resource (farm and forest) areas. As shown in Appendix 2, Map 5, the large, unconstrained resource areas are predominantly Class II farmland.

Study Area 2 – Northeast of the existing UGB, bounded on the west by Highway 30, and on the south by Crown Zellerbach Road. Study Area 2 contains some residential and industrial exception areas (77 acres) adjacent to the airport, and large, unconstrained (by slopes or floodplain) resource areas extending from the existing UGB approximately ½-¾ miles to the Jackson Creek floodplain. The resource areas have predominantly Class III soils adjacent to the existing UGB, with some areas of Class II near the Jackson Creek floodplain.

Study Area 3 – Southeast of the existing UGB, bounded on the north by Crown Zellerbach Road and the west by Highway 30. Study Area 3 contains large, flat, unconstrained (by slopes or floodplain) resource areas near Highway 30, extending approximately ¼ mile east of Highway 30 to the Jackson Creek floodplain. Beyond the floodplain are additional large, flat, unconstrained resource areas. Resource areas near Highway 30 and adjacent to the UGB are predominantly Class II soils. Resource areas east of the floodplain are a mix of Class II and III soils.

Study Area 4 – Southwest of the existing UGB, bounded on the east by Highway 30 and the north by Scappoose-Vernonia Highway. Study Area 4 consists of predominantly constrained (sloped) residential exception and resource areas. Unconstrained areas include a small residential exception area (18 suitable acres) south of the existing UGB.

Within each of these four study areas Winterbrook proceeded to classify land based on ORS 197.298 Priorities, as follows:

- Exception Areas
- Lower Value (Higher Priority) Agricultural Land – with predominantly Class III soils
- Higher Value (Lower Priority) Agricultural Land – with predominantly Class II soils

Priorities for UGB Expansion and Application of Goal 14 Location Factors [OAR 660-024-0060(1) through (4)]

(1) *When considering a UGB amendment, a local government must determine which land to add by evaluating alternative boundary locations. This determination must be consistent*

with the priority of land specified in ORS 197.298 and the boundary location factors of Goal 14, as follows:

(a) Beginning with the highest priority of land available, a local government must determine which land in that priority is suitable to accommodate the need deficiency determined under OAR 660-024-0050.

Highest Priority: Suitable Exception Areas

Council Findings: In Scappoose's situation, the first priority for meeting identified employment needs outside the UGB is land within "exception areas."

As shown in Appendix 2, Map 5: *Exception Areas*, rural residential exception (non-farm and non-forest) land is found to the west, northeast, northwest, southwest of Scappoose.¹⁵ **However, most of the exception areas do not have the site characteristics required by employment identified in the Scappoose EOA.**

Appendix 2, Map 6: *UGB Expansion Alternatives* shows exception areas that are potentially suitable for meeting identified highway commercial needs (in the case of Study Areas 1 – Northwest and 4 - Southwest) and industrial needs (in the case of Study Area 2 – Northeast).

The bullet points below includes a summary of exception area parcels that meet identified site suitability requirements for highway commercial (slopes of 10% or less within a quarter mile of Highway 30) and for industrial (slopes of 10% or less, with access to a collector street, that do not abut established residential neighborhoods, with parcels of 5 acres or greater, on relatively low value agricultural soils).

- **Study Area 1 – Northwest Commercial:** 11 Suitable Acres (3 parcels)
- **Study Area 2 – Northeast Industrial:** 56 Suitable Acres (5 parcels)
- **Study Area 3 – Southeast:** 0 Suitable Acres
- **Study Area 4 – Southwest Commercial:** 15 Suitable Acres (all or part of 12 parcels)

The Advisory Committee recommended including suitable parcels adjacent to the UGB in the Northeast (56 acres for industrial use) and Southwest (15 acres for highway commercial and office use) study areas. However, the Advisory Committee recommended against inclusion of otherwise suitable exception parcels in the Northwest Area (11 acres). Rather than including 11 acres in the Northwest Exception Area to meet identified highway commercial needs, the Advisory Committee recommended holding 12 needed commercial acres in reserve to justify re-

¹⁵ Of note, rural residential lands were originally zoned for rural residential use due to existing development patterns that made the land unsuitable for commercial agricultural or forestry use. They are generally characterized by small lots (relative to the resource-zoned lands), developed residential investment (houses, garages, driveways, roadways, etc), and multiple individual owners. Commercial land uses command higher land prices and therefore can afford to purchase and redevelop smaller, developed lots along Highway 30. However, industrial land uses require larger parcels (where the average parcel size is five acre or larger) to meet site suitability requirements.

designation of land within the existing UGB – in conjunction with a residential land needs assessment – in the future.

In recognition of the existing location of the Fairview Cemetery between Old Portland Road and Highway 30 in the Southwest area, staff proposed that this land receive the Public Lands designation on the Comprehensive Plan map (the site had already been deemed not suitable for commercial development).

The Planning Commission and City Council heard testimony from property owners west of Old Portland Road (Study Area 4) indicating they did not want to come into the UGB. The Planning Commission recommended reducing the UGB expansion in the Southwest area – proposing inclusion of only the Cemetery and 5 net commercial acres between Old Portland Road and Highway 30. All of the exception lands in Study Area 2 were proposed for inclusion to meet industrial needs. The City Council adopted the Planning Commission recommendation for UGB expansion areas and added the Gilmore Road area as discussed previously.¹⁶

(b) If the amount of suitable land in the first priority category exceeds the amount necessary to satisfy the need deficiency, a local government must apply the location factors of Goal 14 to choose which land in that priority to include in the UGB.

Consideration of Goal 14 location factors for deciding which highest priority exception areas to include within the UGB follows the discussion of ORS 197.298 Priorities.

(c) If the amount of suitable land in the first priority category is not adequate to satisfy the identified need deficiency, a local government must determine which land in the next priority is suitable to accommodate the remaining need, and proceed using the same method specified in subsections (a) and (b) of this section until the land need is accommodated.

Medium Priority: Lower Value Resource Land

Council Findings: After accounting for the capacity of the existing UGB and nearby exception areas to accommodate identified commercial employment site needs, the Advisory Committee next considered the next ORS 197.298 priority – relatively low value agricultural land that meets identified industrial site requirements. **In the Scappoose area, the lowest value soils that also meet identified industrial site requirements, are Class III agricultural soils.** Class IV soils and worse are associated with steeper slopes or are located within the 100-year floodplain.¹⁷

¹⁶ Revisions to the EOA during the City Council hearings process resulted in a 16-acre reduction in commercial land need.

¹⁷ As shown in Appendix 3, Map 1: Soil Classes, Scappoose is surrounded by soils of Classes I-IV, and VI (a lower soil class number indicates higher agricultural capability – and therefore a lower priority for inclusion within a UGB). The Class I-III soils are generally found to the northwest, east, and southeast of Scappoose, while the lower

Industrial land uses require large, flat, undeveloped parcels with access to a collector street; such sites are not available in highly-parcelized exception areas or the lowest capability Class IV-VI soils because these lands are too steep. Except for the Northeast Exception Area which has larger rural residential parcels, the highest priority for industrial uses is resource land with Class III soils. **The only area with predominantly Class III agricultural soils adjacent to the existing UGB is found in the Northeast study area – immediately east of the Scappoose Airport.**

Industrial development in this area is advantageous from a transportation perspective, as documented in Appendix 4, *Transportation Studies*. The Advisory Committee and Planning Commission, therefore, recommended that industrial land needs should be met immediately east of the Airport. The Council concurred with the recommendations and included lands east of the airport to meet industrial land needs.

Lowest Priority – Higher Value Agricultural Land

The Advisory Committee and Planning Commission reluctantly recommended against inclusion of land in the Southeast study area, solely because this area has predominantly higher value (and lower priority) Class II agricultural soils adjacent to the existing UGB and Highway 30. The Advisory Committee's recommendation recognized that inclusion of the western portion of the Southeast study area would have allowed a north-south collector to connect Havlik Road with Johnson's Landing Road, thus relieving some traffic congestion on Highway 30. However, the priorities set forth in ORS 197.298 do not permit the City to take such needs into consideration, especially when other sites of a higher priority possess similar or better site characteristics. The City Council concurred with the Planning Commission recommendation.

UGB Adjustment to Minimize Impact on Higher Value Class II Agricultural Soils

The Advisory Committee had several lengthy discussions about the importance of ORS 197.298 Priorities, and the fact that some lower priority, Class II agricultural soils were included in Appendix 5, the *Scappoose Airport Land Use Concept Plan* (Concept Plan) prepared by Otak. As a result of this discussion, the proposed UGB was re-aligned to the west of where it had been shown on a previous draft Concept Plan to avoid about 29 acres of Class II soils east of the airport near the Jackson Creek floodplain.

The UGB in this location is determined by the collector connecting road, which now heads directly north – rather than, as originally planned, arcing to the northwest to maximize land use efficiency. This UGB adjustment reduced the proposed amount of higher value (but lower

capability IV and VI soils are found to the west and southwest. However, the EOA determined that employment land should be relatively flat and outside the floodplain. As shown in Appendix 3, Map 2: *Slopes, and Soils*, Class IV and VI soils to the west and southwest of Scappoose are associated with sloped areas that are unsuitable for employment. As shown in Appendix 3, Map 3: *Floodplain, Slopes and Soils*, floodplain overlaps with some Class III soils to the northwest, west, and east of Scappoose and with the only relatively flat Class IV soils in the area – to the north of Scappoose.

priority) Class II soils from 70 to 41 acres. The Planning Commission continued to recommend the revised alignment, and the City Council adopted the Planning Commission recommendation.

The Council's Northeast UGB expansion area includes the following acreage by priority class:

- 77 gross acres in exception areas (highest priority)
- 236 gross resource acres with Class III soils (medium priority)
- 41 gross resource acres with Class II soils (lowest priority)

(d) Notwithstanding subsection (a) to (c) of this section, a local government may consider land of lower priority as specified in ORS 197.298(3).

(e) For purposes of this rule, the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under section (5) of this rule, as well as other provisions of law applicable in determining whether land is buildable or suitable.

Council Findings: This exception to ORS 197.298 Priorities mirrors the text of Goal 14 and OAR 660-009-0050(5):

If a local government has specified characteristics such as parcel size, topography, or proximity that are necessary for land to be suitable for an identified need, the local government may limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298.

Since the Scappoose EOA and these findings specify characteristics necessary for land to be suitable for employment, the proposal to include industrial land east of the Scappoose Airport that has lower-value, Class III soils, is also allowed by this exception.

(4) In determining alternative land for evaluation under ORS 197.298, "land adjacent to the UGB" is not limited to those lots or parcels that abut the UGB, but also includes land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency.

Council Findings: This proposal considered all nearby (within a quarter mile of the UGB) exception areas that meet identified employment site requirements.

Alternatives Analysis OAR 660-024-0060(3) and (6)

(1) *The boundary location factors of Goal 14 are not independent criteria. When the factors are applied to compare alternative boundary locations and to determine the UGB location, a local government must show that all the factors were considered and balanced.*

Council Findings: The findings below consider and balance each of the Goal 14 location criteria – first within exception areas and then within the only area with relatively high priority Class III agricultural soils.

(6) *The adopted findings for UGB adoption or amendment must describe or map all of the alternative areas evaluated in the boundary location alternatives analysis. If the analysis involves more than one parcel or area within a particular priority category in ORS 197.298 for which circumstances are the same, these parcels or areas may be considered and evaluated as a single group.*

Council Findings: These findings describe and map two sets of UGB expansion study areas:

- first, four general study areas within a mile of the existing UGB; and
- second, subareas based on ORS 197.298 priority categories (exception areas, resource areas with relatively poor soils, and resource areas with relatively good soils) that meet identified employment siting requirements.

Goal 14 Locational 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; and (4) Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB.*

Goal 14 Location Factor 1: Efficient accommodation of identified land needs

Exception Area Alternatives: Appendix 2, Map 6: *UGB Expansion Alternatives* shows three suitable employment areas (areas that meet site suitability criteria) in rural exception areas:

- Study Area 1 – the Northwest Exception Area adjacent to Highway 30
- Study Area 2 – the Northeast Exception Areas (1-3) adjacent to the Airport
- Study Area 4 – the Southwest Exception Areas (1-3) adjacent to Highway 30 and Portland Road

Generally speaking, efficient urban growth extends from the center outwards in concentric circles. All three exception area sites are contiguous to the UGB. However, the Northwest and Southwest Exception Areas extend in a linear fashion along the west side of Highway 30. Both

the Northwest and Southwest Exception Areas, if included within the UGB, would have rural land across Highway 30 to the east.

This linear form is relatively inefficient when compared with the inclusion of the Northeast Exception areas, which generally extend eastward from the airport runway and northward from the existing UGB. To minimize this linear form, and recognizing that most commuter traffic will come from the Portland area to the south, the Advisory Committee recommended against inclusion of the Northwest Exception Area adjacent to Highway 30. The Planning Commission continued to recommend against expansion of commercial to the northwest, and the City Council concurred with the Planning Commission recommendation.

Lower Value Resource Land Alternative: Appendix 2, Map 6: *UGB Expansion Alternatives* shows the Northeast Resource Site. This is the only potential UGB expansion area with Class III soils adjacent to the UGB in a larger area with predominantly Class III soils.¹⁸ When combined with the Class III resource land to the east (also in Study Area 2), the industrial land added to the UGB "fills in" the area north of the existing UGB north of Crown Zellerbach Road.

Location Factor 1 Conclusion: On a comparative basis, inclusion of a combination of exception and resource land in the Northeast Study Area is more efficient than inclusion of exception area land along Highway 30.

Goal 14 Location Factor 2: Orderly and economic provision of public facilities and services; [OAR 660-024-0060(7) and (8)]

(7) For purposes of Goal 14 Boundary Location Factor 2, "public facilities and services" means water, sanitary sewer, storm water management, and transportation facilities.

(8) The Goal 14 boundary location determination requires evaluation and comparison of the relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services needed to urbanize alternative boundary locations. This evaluation and comparison must be conducted in coordination with service providers, including the Oregon Department of Transportation with regard to impacts on the state transportation system. "Coordination" includes timely notice to service providers and the consideration of evaluation methodologies recommended by service providers. The evaluation and comparison must include: (a) The impacts to existing water, sanitary sewer, storm water and transportation facilities that serve nearby areas already inside the UGB; (b) The capacity of existing public facilities and services to serve areas already inside the UGB as well as areas proposed for addition to the UGB; and (c) The need for new transportation facilities, such as highways and other

¹⁸ Study Areas 1 and 3 and have suitable industrial sites; however, both of these areas have Class II soils abutting the UGB in a larger area of predominantly Class II soils. An irregularly-shaped Class III area of approximately 30 acres touches the UGB in two locations in Study Area 3; however, most of this area is indicated as wetlands in the Scappoose LWI. Study Area 4 has no suitable employment sites on resource land.

roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements on existing roadways and, for urban areas of 25,000 or more, the provision of public transit service.

Appendices 3, *UGB Infrastructure Report* and 4, *Transportation Studies* examine the City's existing sanitary sewer, water, storm drainage and transportation master plans and systems and identify projects necessary to serve the existing UGB and potential expansion alternatives. Drafts of these documents were reviewed by the Advisory Committee, which included City,¹⁹ County, Port District and ODOT representatives.

- Appendix 3 *UGB Infrastructure Report* summarizes public facilities information from existing master plans and identifies new projects that will be needed to serve land within the existing UGB. Appendix 3 also identifies new facilities projects in Study Areas 2 and 4 that will be required to serve proposed UGB expansion areas that meet site suitability requirements identified in the Scappoose EOA.
- Appendix 4.A *Scappoose UGB Alternatives Transportation Analysis* considers the relative transportation impacts of UGB expansion, based on four evaluation factors, for each of the four study areas. Study Area 2 (Northeast) received the highest transportation ranking, in large part because existing transportation infrastructure followed by Study Areas 3 (Southeast). Study Areas 1 and 4 ranked the lowest.
- Appendix 4.B *Scappoose UGB Expansion Transportation Impacts* describes new facilities projects that will be required to serve UGB expansion alternatives in Study Areas 2 and 4 that meet site suitability requirements identified in the Scappoose EOA.

Exception Area Alternatives: Appendices 3 and 4 identify projects necessary to serve suitable land in each of the exception areas in Study Areas 2 (Northeast adjacent to the airport) and 4 (Southwest along Highway 30). Appendix 3 concludes that it is feasible to serve these exception area sites, but infrastructure extensions not presently within the City's system development plan or capital improvements plan, including a sanitary sewer pump station, would be needed to serve the Southwest Exception Area. Public facilities will need to be provided to intervening lands before it becomes affordable to serve these relatively small exception areas.

Lower Value Resource Land Alternative: Providing sewer, water and storm drainage facilities *efficiently* to the Northeast Exception Area depends on the phased development of the Northeast Resource Area – including construction of a north-south connecting road and related sewer, water, storm drainage and airport facilities. Appendix 3 includes a public facilities phasing program. Appendix 4.A notes that construction of the north-south connection between Crown Zellerbach Road and Moore and North Honeyman Roads would reduce traffic congestion along Highway 30.

¹⁹ The City is responsible for the provision of sanitary sewer, water, storm drainage and local street facilities.

Location Factor 2 Conclusion: Based on public facilities and transportation studies included in Appendices 3 and 4, it is feasible to provide sanitary sewer, water, storm drainage and transportation facilities to suitable UGB expansion areas shown in Appendix 2, Map 6: *UGB Expansion Alternatives*. On a comparative per acre cost basis, it is less costly to extend public facilities and services to the Northeast Area Industrial Expansion Area than to the much smaller are more distant Southwest and Northwest Commercial Expansion Areas. In part because of the high cost of extending public facilities and services to the Northwest, the Advisory Committee recommended against inclusion of this area within the UGB.

Goal 14 Location Factor 3: Comparative economic, social, environmental and energy consequences:

Exception Area Alternatives: The findings immediately below are limited to the comparative ESEE consequences of including suitable (highest priority) exception areas in Study Areas 1, 2 and 4.

- **Economic Consequences:** The economic consequences of including all of these areas will be positive, because their inclusion will provide suitable employment land as called for in the Scappoose EOA. However, the cost of providing public facilities and services to the Northwest and Southwest areas will be relatively high (on a per acre basis), compared with the Northeast Area. However, it should be noted that some of the infrastructure upgrades that could serve the Southwest area would also serve properties currently within the UGB but beyond the City's current sanitary sewer collection system.
- **Social Consequences:** The social consequences of including developed residential areas in Study Areas 1 and 4 for commercial development will be greater than bringing in largely undeveloped land near the airport for industrial purposes. This adverse social consequence will be offset by increased service and retail jobs and improved access to local retail outlets and services.
- **Environmental Consequences:** There are no significant environmental consequences for bringing in any of the three exception areas because the UGB boundary has been drawn to avoid floodplains, most erodible sloped areas, and major wetlands. Considerable testimony was offered through the UGB amendment process to the effect that expansion of the UGB would perforce result in elimination of an important City resource; namely, the Crown Zellerbach Trail and that expansion of the UGB to the northeast would conflict with a Columbia County Plan to protect it. First, the County has not adopted its Crown Zellerbach Trail Development Concept Plan through any land use process. Rather, it is a plan which includes several general concepts for how the trail may be enhanced to encourage its primary recreational uses. The City's expansion of the UGB and the other land use actions that will occur in association with it contain no changes to the City's policies applicable to the Crown Zellerbach Trail (Appendix 7.A).

- **Energy Consequences:** The energy consequences of including all three exception areas will be positive, since local employment will improve the jobs-housing balance and reduce retail and service “leakage” – which will likely result in reduced energy consumption for (a) working commuters and (b) shoppers. On a comparative basis, inclusion of the Northeast Expansion Area results in a more compact urban growth form than the linear growth pattern that results from inclusion of more commercial land along Highway 30.

Lower Value Resource Land Alternative: Appendix 2, Map 6: *UGB Expansion Alternatives* shows the Northeast Resource Site as the only potential UGB expansion area that: (a) meets industrial site suitability requirements; and (b) has higher priority Class III soils adjacent to the UGB in an area with predominantly Class III (rather than lower priority Class II) soils.

- **Economic Consequences:** The economic consequences of including the Airport Employment Area within the UGB are extremely positive. Approximately 2,600 new jobs are planned for this area over the next 20 years. Including this area will allow construction of the north-south connector street which will reduce traffic congestion on Highway 30, which is a critical economic asset to Scappoose and the region. On the negative side, a portion of the Northeast Expansion area is currently farmed and therefore has agricultural value.
- **Social Consequences:** The Council heard testimony protesting against use of Crown Zellerbach for vehicular traffic. Increased traffic would increase noise levels and reduce the ability of local residents to enjoy recreational opportunities on the paved surface. However, providing local employment for existing and future Scappoose residents will have a variety of positive social consequences, including increased income (and a host of related social indicators) and reduced commuting time (and more time for family and recreational pursuits). Providing a local parking and staging area for bicycle and water recreation will also have a positive social impact.
- **Environmental Consequences:** The UGB in this area excludes the Jackson Creek floodplain and associated wetlands. The Scappoose Local Wetland Inventory (LWI) shows a wetland covering approximately 20 acres in and near the area proposed for airport runway expansion. On the one hand, developing this wetland area would have a potential adverse environmental impact; on the other hand, this impact can be mitigated on-site in the Jackson Creek wetland area. Wetlands in this area also pose a flight hazard; moving the wetland away from the runway would therefore have a positive social consequence.
- **Energy Consequences:** The energy consequences of including the Northeast Expansion Area for industrial purposes will be positive, since local employment will improve the jobs-housing balance – which will likely result in reduced energy consumption for working commuters.

Location Factor 3 Conclusion: Inclusion of all four areas will provide local jobs and reduce energy consumption resulting from commuting and shopping. Bringing in the Northwest and Southwest commercial areas could have significant adverse social consequences to those living in rural residences that will eventually be displaced by commercial development. There are no serious adverse environmental consequences resulting from inclusion of any of these areas within the Scappoose UGB; identified wetland impacts resulting from development will be offset by increased jobs, increased flight safety, and onsite mitigation.

Goal 14 Location Factor 4: Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB.

Exception Area Alternatives: Inclusion of rural residential exception areas for employment use in Study Areas 1, 2 and 4 would minimally (if at all) increase existing incompatibilities; typically rural residential uses create more conflicts with agriculture than employment uses.

However, the Southwest would have less impact on agricultural land than the Northwest Exception Area, because the Northwest and Northeast Exception Areas abut agricultural land on two sides (whereas the Southwest Exception Area does not abut agricultural land at all). Comparatively speaking, there are marginal differences in agricultural land compatibility among the three exception areas under consideration for inclusion within the Scappoose UGB.

However, as noted below, any adverse impact on agricultural land resulting from inclusion of the Northeast Exception Area is mitigated by the fact that resource land adjacent to the Northeast Exception Area is also proposed for inclusion within the UGB.

Lower Value Resource Land Alternative: The inclusion of the Northeast Expansion Area for industrial use will not create substantial incompatibilities with nearby agricultural land for two reasons:

- First, industrial uses (when compared with residential uses) are reasonably compatible with adjacent farming operations in the area. Industrial uses are not as sensitive to dust, noise, and chemical impacts as are residential uses; moreover, industrial uses typically do not create conflicts with agriculture from roaming children or unleashed pets.
- Second, the proposed north-south collector connector will serve as an effective artificial buffer between agricultural uses outside the UGB and urban industrial and airport-related uses inside the UGB.

Location Factor 4 Conclusion: Converting rural residential areas to urban commercial areas will likely decrease existing conflicts with agricultural land – because commercial uses are more compatible with agricultural operations than residential uses. Potential adverse impacts from

expanding the UGB to allow relatively low-impact industrial uses will be buffered by the proposed north-south collector, which defines the UGB in this area.

Goal 14 Conclusion

For reasons stated above, and based on information found in the Scappoose EOA and accompanying Winterbrook, Otak and DKS memoranda, the proposed Comprehensive Plan amendments comply with Goal 14 as implemented by OAR Chapter 660, Division 024.

Statewide Planning Goals 1 and 2

The Advisory Committee meetings represented the first phase of Scappoose's citizen involvement process for the 2011 comprehensive plan amendment package. During this process, the Advisory Committee reviewed several drafts of the EOA before recommending the February 2010 final draft for review by the Scappoose and Columbia County Planning Commissions. The Advisory Committee also considered a suitable employment sites inventory, public facilities and transportation studies, and growth alternatives studies. A public open house was held on May 5, 2010 to allow members of the public to comment on the Advisory Committee's work.

Phase 1 Public and Agency Involvement: Advisory Committee Deliberations

The Scappoose EOA Advisory Committee met seven times between December 8, 2008 and May 18, 2010. The Advisory Committee reviewed and discussed:

- The UGB process, tasks, and timeframes;
- Community input on target industries;
- Evaluation of existing employment land supply and revisions;
- The community economic vision;
- Employment land need and supply comparisons;
- Draft public facilities studies;
- Draft transportation studies;
- Statutory priorities for expansion direction;
- Potential distribution center concept southeast of Havlik-Highway 30 intersection;
- Highway commercial growth direction preference;
- Results of the May 5, 2010 open house; and
- The final recommendation outlined at the beginning of these findings.

Phase 2 Public and Agency Involvement: Public Work Sessions and Hearings

Phase 2 of the public involvement process requires review by the Scappoose and Columbia Planning Commissions, the Scappoose City Council, and the Columbia Board of County Commissioners. Towards this end:

- A Joint Planning Commission Work Session was held on July 22, 2010 for the Scappoose Planning Commission and the Columbia County Planning Commission.
- The City mailed notice to property owners within the affected area on August 18, 2010 to inform them of the proposed land use actions. Notice of the Planning Commission hearings was published in the South County Spotlight on August 25, September 1, and

September 8, 2010, with additional notice in the St. Helens Chronicle on September 1 and September 8, 2010 and display advertisements appearing on September 1 and 8. Postcards were mailed to property owners, hearing participants, and interested parties on September 13 and 27, 2010.

- Four Planning Commission Hearings were held between September 9 and October 28, 2010: Public testimony resulted in Planning Commission-directed changes to the proposed southwest expansion area (removal of proposed lands west of Old Portland Road), public facilities analysis revisions to reflect service options to the area proposed for inclusion between Old Portland Road and Highway 30, and a significant re-working of the airport overlay zones to better allow for the intended character of uses near the airport, consistent with the EOA.
- Notice of the City Council hearings was published in the South County Spotlight on November 17, November 24, and December 1, 2010, with display advertisements appearing on November 24, December 1, December 22, and December 29. Postcards were mailed to property owners, hearing participants, and interested parties on December 16, 2010.
- Notice of the April 4 City Council hearing on the proposal to expand the UGB to include the western portion of three parcels near Gilmore Road was mailed to property owners on March 11, 2011. Notice of the hearing was published in the South County Spotlight on March 23 and 30, 2011.
- Five City Council Hearings were held between December 6, 2010 and April 4, 2011. Public testimony resulted in City Council-directed changes to the EOA in order to correct some table inconsistencies, along with corresponding modifications to the Comprehensive Plan and inclusion within the UGB of the developed back ends of three commercial parcels on Highway 30 near Gilmore Road.

Factual Base and Consideration of Alternatives

The factual and analytical basis for the comprehensive plan amendment package includes the appendices and maps cited above, information provided at Advisory Committee work sessions, and information provided in these findings. As documented under the Goal 14 discussion above, the Advisory Committee considered four UGB expansion alternatives before recommending that employment growth be directed to the Northeast and Southwest areas. The transportation and public facilities studies also considered the impacts of growth alternatives. Finally, these findings include a comparative analysis of UGB expansion alternatives based on Goal 14 location factors. The Planning Commission and City Council concurred with the Advisory Committee recommendation.

Intergovernmental/Interagency Coordination

The Advisory Committee included representatives from DLCD, ODOT, Business Oregon, the Port of St. Helens, and Columbia County. The Port of St. Helens confirmed its support for the

draft Scappoose EOA and the UGB expansion proposed by staff in a May 18, 2010 letter (Appendix 6.A). All state agency and local government participants voted to approve the recommendation to the Scappoose City Council regarding (a) the draft EOA, and (b) the direction of UGB expansion.

DLCD notice of the proposed legislative amendment package was provided at least 45 days in advance of the September 9, 2010 initial public hearing before the Scappoose Planning Commission (notice was mailed July 22, 2010). State and local units of government are encouraged to continue to participate in the process, both informally through communications with City staff and consultants, and formally through the public hearing process. City and County staff will be coordinating regarding the timing and location of the public hearing process.

The City provided the opportunity for the following organizations to review and comment on the proposed land use actions in summer 2010:

- Oregon Department of Land Conservation and Development
- Oregon Department of Transportation (Region 1)
- Oregon Business Development Department
- Oregon Department of Aviation
- Port of St. Helens
- Columbia County Road Department
- Columbia County Land Development Services
- Kennedy/Jenks Consultants (city engineer)
- Scappoose Rural Fire District
- Scappoose Police Department
- Scappoose Drainage Improvement Company
- Scappoose School District
- Columbia Soil & Water Conservation District
- Scappoose Bay Watershed Council
- CenturyLink
- Columbia River PUD
- NW Natural
- Comcast

No agencies objected to the proposal. ODOT Region 1 staff requested the transportation contingency language included in the Goal 12 discussion (Appendix 6.C-6.E). The Scappoose Drainage Improvement Company submitted a letter (Appendix 6.B) observing that some of the area proposed for expansion of the UGB may not be shown as protected from the base flood if the Federal Emergency Management Agency (FEMA) decertifies the dike; along with acknowledgement that stormwater quantity and quality would need to be addressed upon development.

Comprehensive Plan and Land Use and Development Code Consistency

Goal 2 requires that local land use regulations be consistent with and adequate to carry out the policy choices set forth in the Comprehensive Plan. The Scappoose EOA serves as both the factual and policy base for proposed amendments to the text of the Comprehensive Plan, and for the new Airport Employment plan designation and implementing overlay zones.

Goals 1 & 2 Conclusion

For reasons stated above, the proposal complies (or will comply following the public hearing process) with Goals 1 and 2.

Statewide Planning Goals 5, 7, and 8

Goal 5 Wetlands and Riparian Corridors

Pacific Habitat Services prepared the Scappoose Local Wetlands Inventory (LWI) in 1998. The LWI identifies locally significant wetlands and riparian corridors within and immediately to the northeast and south of the existing Scappoose UGB. Generally, wetlands on employment land within the UGB are within the 100-year floodplains of Scappoose and Jackson Creeks. However, outside the UGB (in the Southeast and Northeast UGB study areas) a few wetlands extend beyond the Jackson Creek floodplain. There are about 20 acres of mapped wetlands outside the 100-year floodplain in the Northeast UGB expansion area.

The EOA considers wetland areas to be unsuitable for employment purposes; moreover, wetlands in these areas are intended to be protected by the Sensitive Lands chapters of the Scappoose Development Code.²⁰ Therefore, to comply with Goal 5 and Goal 9, the suitable employment acreage within the Airport Employment (AE) designation in the Northeast UGB expansion area has been reduced by 20 acres.

Goal 7 Flood Hazards

The Scappoose EOA considers land within the 100-year floodplain to be unsuitable for employment purposes. Therefore, to comply with Goal 7 and Goal 9, expansion in the Northeast and Southwest UGB expansion areas avoided floodplain areas. Since riparian corridors (and associated wetlands) are commonly found in the floodplain, avoidance of floodplain areas has the effect of avoiding most wetland and riparian corridor impacts.

Goal 8 Park and Recreational Needs

The Advisory Committee recognized the importance that access to bicycle trails and the Multnomah Channel have to the quality of life in Scappoose and to the community's economic future. To address this issue, the Scappoose Airport Land Use Concept Plan (Appendix 5) and the proposed Plan Designations map (Map C) includes a 15-acre Public Lands site to accommodate a small parking lot and staging area to promote bicycle and boating recreational opportunities.

²⁰ Chapters 17.85 and 17.89 (Sensitive Lands) of the Scappoose Development Code protect wetlands and riparian corridors identified in the LWI. These chapters appear to be based loosely on the "safe harbor" provisions of the Goal 5 administrative rule (OAR Chapter 660-023-090 through 100). For Jackson and Scappoose Creeks (and adjacent wetlands), these chapters require a 50-foot setback from the top of bank (or associated wetland edge). Isolated wetlands have a 25-foot buffer. However, streets and utilities may be permitted in protected wetlands and riparian corridors subject to administrative review and mitigation in consultation with the Oregon Department of Fish and Wildlife (ODFW) and the Department of State Lands (DSL).

Goals 5, 7, and 8 Conclusion

The proposed comprehensive plan amendment package complies with Goals 5, 7, and 8.

Statewide Planning Goals 11, 12, and 13

This section demonstrates compliance with Goals 11 (Public Facilities and Services), 12 (Transportation), and 13 (Energy Conservation).

Goal 11 Public Facilities and Services

Goal 11 requires local governments to plan and develop a "timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban and rural development."

Appendix 3 includes a public facilities study that: (a) demonstrates how the City will provide an adequate level of sanitary sewer, water, storm drainage and transportation facilities to serve land within the existing UGB; and (b) describes how these key public facilities can be provided efficiently to employment land proposed for inclusion within the Scappoose UGB. The study identifies public facilities projects necessary to serve the existing UGB and recommended expansion areas efficiently over the 20-year planning period.

Goal 12 Transportation

Goal 12 requires local governments to provide and encourage a safe, convenient and economic transportation system.

Appendix 4 includes a two-part transportation study that: (a) ranks alternative study areas in based on four transportation efficiency factors; and (b) examines potential transportation impacts and probable improvements necessary to mitigate impacts from planned development in each of the four study areas. Overall, the Northeast and Southeast quadrants ranked first and second, respectively, for inclusion within the UGB based on transportation considerations; the Southwest and Northwest quadrants tied for the lowest ranking. DKS considered the City's existing Transportation System Plan in preparing these studies.

The Goal 14 administrative rule recognizes that:

"The transportation planning rule requirements under OAR 660-012-0060 need not be applied to a UGB amendment if the land added to the UGB is zoned as urbanizable land, either by retaining the zoning that was assigned prior to inclusion in the boundary or by assigning interim zoning that does not allow development that would generate more vehicle trips than development allowed by the zoning assigned prior to inclusion in the boundary."

To satisfy TPR requirements, and consistent with written comments from ODOT staff (Appendix 6.C-6.E) the ordinance adopting the Comprehensive Plan amendment package includes the following condition:

“Prior to approval of annexation and zone change of any property included within the Urban Growth Boundary amendment as a result of this ordinance, the applicant shall prepare an Oregon Department of Transportation (ODOT) scoped and approved Traffic Impact Analysis and comply with provisions of the Transportation Planning Rule (OAR 660-012-0060). If analysis indicates significant effect per OAR 660-012-0060, the applicant shall mitigate associated traffic impacts, as permitted and approved by ODOT.”

The Council heard extensive testimony related to use of Crown Zellerbach Road for vehicular traffic. Opponents of the proposal claimed that vehicular use of the road would:

- 1) Be inconsistent with Columbia County’s Crown Zellerbach Trail Development Concept Plan; and
- 2) Be unallowable under the City’s Public Lands - Recreation zoning regulations.

As indicated in the January 28, 2011 Staff Report (Appendix 7.A), Crown Zellerbach Road is classified as a collector on the Scappoose Transportation System Plan (TSP) and is on the long range project list for improvement to minor collector standards. The County’s Concept Plan is not an adopted planning document, so use of Crown Zellerbach for vehicular traffic is consistent with all planning documents.²¹

The concern relating to Public Lands - Recreation zoning was a mis-reading of a zoning map. Crown Zellerbach in the area under discussion is outside of the city limits and not within City zoning.

Goal 13 Energy Conservation

Goal 13 requires that land uses be managed and controlled to maximize the conservation of all forms of energy based on sound economic principles.

The Scappoose EOA is designed to provide local job, retail, service and educational opportunities in proximity to residential neighborhoods in Scappoose, and thus reduce vehicle miles travelled from home to work.

²¹ In addition, according to the Trail Development Concept Plan itself (p. 21), Crown Zellerbach Road through Scappoose is intended to have an urban character. The Trail Plan even includes a photograph of the trail in Scappoose improved to collector street standards. Even if the Trail Development Concept Plan were legally binding as a planning document, the proposed use of Crown Zellerbach would be consistent with the Concept Plan.

- By providing more local retail and office commercial opportunities, Scappoose residents will be less likely to drive into the Portland metropolitan area to meet these needs.
- By providing local educational opportunities, Scappoose residents will consume less energy seeking to improve educational attainment levels.
- By providing basic employment opportunities in Scappoose, residents will be more likely to bicycle or walk to work, thus reducing energy consumption.

Goals 11, 12, and 13 Conclusion

The proposed comprehensive plan amendment package complies with Goals 11, 12, and 13.

Scappoose Comprehensive Plan Economic Policies

The following findings demonstrate that the proposed comprehensive plan amendment package complies with existing economic, industrial and commercial plan policies.

Economy Policies

It is the policy of the City of Scappoose to:

- 1) *Make sufficient suitable land available for the anticipated expansion of commercial and industrial activities.*

Council Findings: The proposed UGB amendment directly responds to this policy, by identifying future employment needs in an EOA and providing employment sites suitable to meet the needs identified in the EOA. This policy is proposed to be revised to read "Make sufficient suitable land available for the anticipated expansion of commercial and industrial activities identified in the Scappoose EOA."

- 2) *Encourage the preservation, improvement and renewal of the existing business district of the City so that it will be allowed to play a role as a center of economic and civic activity for the entire community.*
- 3) *Encourage the intensification of land use in the present commercial strips, together with design features that would reduce conflict with traffic flow, such as frontage roads and single access joint off of the street parking.*

Council Findings: The proposed UGB amendment encourages the preservation, improvement and renewal of existing businesses in the City by limiting the expansion of highway commercial uses to one site south of the City, while planning for most new employment to occur within the existing UGB.

- 4) *Encourage the expansion of employment opportunities within the urban area, so residents can work within their community as well as commute to jobs outside the County.*

Council Findings: The proposed UGB expansion provides for employment land within the urban area, consistent with the EOA. This will provide more opportunity for local jobs and a reduction in commute time for residents.

- 5) *Promote pollution free industrial development necessary to provide a balanced tax base for the operation of local government services.*

- 6) *Cooperate with other agencies, interest groups and businesses in efforts to develop program strategies for improving the local economy.*
- 7) *Assist in programs to attract desirable industries in terms of diversification, labor-intensiveness, and non-pollution rather than accept any industry which may wish to locate here; additionally, to prohibit industries with excessive levels of pollution or other undesirable effects which would cancel possible economic benefits or threaten the existing quality of living.*

Council Findings: The EOA was developed through an extensive public process, with the involvement of state, county, port, and local business owners, as described in Goal 1 findings. The proposed EOA and UGB expansion provide land for target industries within the urban area, providing for industries desired by the community, as well as a more balanced tax base.

- 8) *Work with local mining industries to rehabilitate the gravel pits so that there will be an efficient use of land and the pits will not be an eyesore.*

Council Findings: The proposed plan amendment does not affect lands with current mining activities.

- 9) *Work with Departments of Environmental Quality and Fish and Wildlife in enacting controls and performance standards for industrial operations to reduce the possibility of excessive impact upon the environment.*
- 10) *Work with Departments of Environmental Quality and Fish and Wildlife in enacting controls and performance standards for industrial operations to reduce the possibility of excessive impact upon the environment. [Policy 10 is a repeat of policy 9].*

Council Findings: The proposed plan amendment does not alter the City's natural resources protections or planning. Policy 10, a repeat of Policy 9, is proposed to be changed to read "*Capitalize on the comparative advantages offered by the Scappoose Industrial Airpark, proximity to the Portland region, a pro-business community attitude, and the availability of serviced employment land to create job opportunities for existing and future Scappoose residents.*" The new Policy 10 assists in implementing the objectives identified in the EOA.

- 11) *Identify special locations for industrial activities that will assist in energy conservation; specifically, industries should be clustered:*
 - a) *Close to existing rail lines.*
 - b) *To allow for employees to use carpools.*

Council Findings: The EOA identifies Airport-related industries as an existing employment cluster in Scappoose, and airport-related industries are specifically targeted for future growth. Proposed modifications to this policy include the addition of "Highway 30 and the airport" as proximity objectives of Policy 11.a, and "public transportation" as an objective of Policy 11.b. The proposed plan amendment clusters employment near the Airport, as shown on Maps A, B, and C.

- 12) *Encourage mining activities when they are compatible with surrounding activities; such activities are compatible with an airport when:*
- a) *There are no permanent or mobile obstructions affecting airspace.*
 - b) *Any man-made lakes that result from mining are so designed to limit bird hazards.*
 - c) *The operation does not produce dust that impairs visibility.*
 - d) *Man-made lakes that may result are so designed to limit glare which may impair visibility.*
 - e) *There are no electrical interferences with navigational signals or radio communications.*

Council Findings: The proposed plan amendment does not affect lands with current mining activities. This policy is proposed to be amended to read "Ensure that mining activities are compatible with surrounding activities including the airport by applying the Public Use Airport Safety and Compatibility Overlay Zone."

- 13) *Coordinate its plans for public facilities to accommodate expected industrial and residential growth.*

Council Findings: Appendices 3 and 4 evaluate the City's public facilities plans and evaluate the impact of forecast employment growth. This policy is proposed to be amended to read "Coordinate plans by the City, County and Port District to provide and pay for public facilities to accommodate expected industrial, commercial, institutional and residential growth." The amended policy will better reflect coordination and planning requirements for employment growth identified in the EOA.

- 14) *Limit the amount of time the City has to review site design review proposals to prevent unreasonable delays for commercial and industrial enterprises.*

Council Findings: The proposed amendments do not alter the City's current design review or approval process.

- 15) *Encourage design features on Highway 30 that reduce conflicts with traffic flow, as congestion and traffic hazards can only hinder local economic development.*

Council Findings: No design features for Highway 30 are proposed with this amendment. However, the proposed UGB amendment focuses the majority of employment growth near the Airport, with only minor expansions for highway commercial uses to the north and south along Highway 30.

- 16) *Protect industrial, airport-related and commercially designated areas for their intended uses as identified in the Scappoose Economic Opportunities Analysis.*

Council Findings: The proposed Airport Employment comprehensive plan designation and implementing overlay zones protect industrial lands proposed for inclusion, and ensure these lands be retained in site sizes and configurations commensurate with target industries identified in the EOA.

- 17) *Encourage energy saving building practices in future commercial and industrial buildings.*

Council Findings: The proposed UGB amendment does not negatively impact the opportunity for energy saving building practices in future commercial or industrial uses.

- 18) *Zone the aggregate lands northeast of the Highway 30-North Vernonia intersection as Surface Mining upon annexation to protect these resources for mining.*

Council Findings: This policy is inapplicable to the proposed UGB amendment, which does not affect land currently being used for mining operations. This policy is proposed for deletion from the Comprehensive Plan.

Proposed New Policies

- A) *Coordinate with the Port of St. Helens and individual property owners to protect land near the Scappoose Industrial Airpark for intended airport-related and airport-compatible employment uses as called for in the Scappoose EOA.*

Council Findings: Proposed new Policy A emphasizes the importance of protecting land near the airport for airport-related and airport-compatible uses. The proposed UGB amendment package includes a new comprehensive plan designation and implementing zoning for lands proposed to be added to the UGB. The new designation- Airport Employment (AE) - and overlay zone -East Airport Employment (EAE) - protect sites for intended uses by requiring maintenance of identified site sizes and master planning prior to development.

- B) *Take actions called for in the EOA to increase local employment and improve the population to employment balance.*

Council Findings: Proposed new Policy B reflects an objective of the City to attract local employment, and is consistent with the EOA.

Industrial Policies

It is the policy of the City of Scappoose to:

- 1) *Provide suitable areas for industrial expansion, utilizing for such purposes relatively large, flat areas that are separated by buffers from the City's residential districts.*
- 2) *Prevent industrial development from disrupting homogeneous residential neighborhoods.*

Council Findings: The proposed UGB expansion adds large industrial parcels in a master-planned area to the east of the Airport, separated from all residential areas inside the Scappoose UGB by a potential airport runway extension as well as Crown Zellerbach Road.

- 3) *Locate industrial areas so they have a convenient relationship to the community's transportation system, without generating heavy traffic through residential districts; additionally, the clustering of industrial activities will allow carpooling by employees.*

Council Findings: Industrial areas added by the proposed UGB expansion will access Highway 30 directly from Crown Zellerbach Road or West Lane Road, without passing through residential areas. The proposed UGB expansion area is adjacent to existing areas planned for industrial and airport uses inside the current UGB, meeting the objective of this policy to cluster industrial activities.

- 4) *Screen, setback or buffer the boundaries of industry, particularly unsightly areas which can be viewed from arterials or from residential areas.*

Council Findings: Industrial lands added through the proposed UGB expansion will be buffered by a 54-acre potential airport runway extension area, Crown Zellerbach Road, and a planned 15-acre natural area.

- 5) *Apply this designation where industrial concerns have become established and where vacant industrial sites have been set aside for this purpose.*

Council Findings: Areas planned for industrial uses will be provided a plan designation reflecting those planned uses. The proposed UGB expansion area is proposed to be designated "Airport Employment", which is an industrial plan designation.

- 6) *Protect the stability and functional aspects of industrial areas by protecting them from incompatible uses.*

Council Findings: The proposed "Airport Employment" plan designation and implementing "Public Use Airport" zone, as well as the "East Airport Employment", "Airport Business Park" and "Airport Industrial Park" overlay zones restrict site size and uses to be in accordance and compatible with industrial and employment site needs identified in the EOA.

Commercial Policies

Make sufficient land available for the anticipated expansion of commercial and industrial activities.

Council Findings: The proposed UGB expansion, as well as increased land use efficiency within the current UGB, provides sufficient land to meet identified employment site needs.

- 2) *Encourage the preservation, improvement, expansion, and renewal of the City's existing business district and implement the adopted Downtown Scappoose Plan supporting the existing business district in its role as a center of economic and civic activity for the entire community.*
- 3) *Encourage the filling-in of vacancies in present commercial strips, together with design features that would reduce conflict with traffic flow, such as frontage roads and single access joint off-street parking.*
- 4) *Locate business activities in clusters for the convenience of the public to be served rather than scattered or mixed with non-commercial land uses.*

Council Findings: The EOA assumes intensification of existing commercial uses, as well as efficient use of land by limiting strip commercial expansion. This will encourage focus on downtown and urban core areas for provision of commercial and service uses.

- 5) *Allow a wide variety of business, office, and service uses, including motels, hotels, and rooming houses; however, care must be taken to ensure that non-retail uses such as apartments do not prevent the establishment of compact, clustered business centers.*

Council Findings: The proposed UGB provides for clustered business centers in the northeast, separated from residential uses. Intensification of existing commercial uses in downtown, and provision of a 5-net acre (13-gross acre) commercial site in the southwest also cluster employment uses consistent with this policy.

- 6) *Encourage curbing along Highway 30 and limit the number of curb-cuts to minimize traffic hazards as a result of conflicts between through traffic and shopper traffic.*

Council Findings: New employment land identified in the EOA and provided for by the proposed UGB expansion will access Highway 30 through existing intersections at Crown Zellerbach Road, West Lane Road, and Old Portland Road.

- 7) *Improve the general appearance, safety and convenience of commercial areas by encouraging greater attention to the design of buildings, parking and circulation.*
- 8) *Encourage the design features that would reduce conflict with traffic flow, such as frontage roads and single access joint off-street parking.*

Council Findings: The proposed UGB expansion and amendment package includes code amendments that require master planning for development of business and industrial parks. The master planning requirement will provide attention to building, parking, and circulation design prior to development, meeting the objectives of this policy.

- 9) *Encourage the transition of W. 1st into a commercial area for offices and services.*
- 10) *Not expand the amount of commercially-zoned land until sufficient in-filling has occurred in vacant areas.*

Council Findings: The proposed UGB expansion is predicated on an assumption that all lands currently planned for commercial or industrial use inside the UGB will be developed during the 20-year UGB planning timeframe, consistent with this policy.

Scappoose Comprehensive Plan Conclusion

The proposed plan amendment package is consistent with and implements the economic, industrial and commercial policies of the Scappoose Comprehensive Plan.

Columbia County Comprehensive Plan Economic Policies

The following findings demonstrate that the proposed comprehensive plan amendment package complies with existing urbanization and employment plan policies.

PART IX | Urbanization Policies

It shall be a policy of the County to:

1. *Provide an orderly and efficient transition from rural to urban land use.*

Council Findings: This policy is directly linked to the objectives of Statewide Planning Goal 14 (Urbanization). As indicated in Goal 14 findings in this application, the proposed comprehensive plan and urban growth boundary amendments provide for an efficient transition from rural to urban land use, consistent with this policy and Goal 14.

2. *Accommodate urban population and urban employment inside urban growth boundaries, ensure efficient use of land, and provide for livable communities.*

Council Findings: The proposed amendment to the Scappoose Urban Growth Boundary is designed to encourage commercial and industrial development in a defined area near the City of Scappoose, acknowledging the location of existing commercial, industrial, and residential development. Appendices 3 (Scappoose UGB Infrastructure Report) and 4 (Transportation Studies) analyze both the adequacy of existing facilities and the requirements for future facilities to service the existing and proposed UGB in an efficient manner.

4. *Accommodate the growth projected for urban areas to the year 2000.*

Council Findings: This policy is outdated. The proposed urban growth and facilities analysis address a timeframe consistent with the County's coordinated population projection – through the year 2030.

5. *Minimize the conflicts between urban and rural land uses.*

Council Findings: As indicated in Goal 14, Locational Factor 4 findings, the proposed UGB expansion minimizes conflicts between urban and rural uses by proposing industrial expansion on lower-value agricultural soils. The proposed UGB expansion adjacent to the existing airport will be buffered from farmland by a proposed collector street. The commercial expansion to the southwest is bordered by rural residential lands.

6. *Control development within the limitation of the public's ability to provide services.*

Council Findings: Appendices 3 and 4 analyze the impacts and limitations of Scappoose's public facilities and infrastructure. As shown in Appendices 3 and 4, the proposed UGB amendment is serviceable.

8. *Locate major public and private developments where they will not encourage residential growth outside the designated boundary.*

Council Findings: The proposed UGB amendment is primarily industrial, which should not encourage residential growth outside of the Scappoose UGB. Commercial expansion is limited to areas with existing rural residential land uses. No residential expansion is proposed or enabled through the proposed plan amendments.

10. *Review the supply of buildable lands within the urban growth boundaries in cooperation with the cities, during each major review of the County's plan. The process of expanding the urban growth areas may begin when there is less than a five (5) year supply of residential land. Cities also are required by Statewide Planning Goal 9 to maintain at least an eight (8) year supply of serviceable industrial or commercial land inside the Urban Growth Boundary. Serviceable land is that which can be provided with public water and sewer utilities within one year, if such services are requested.*

Council Findings: Scappoose's UGB was established in 1983 to provide a 20-year land supply. It was last reviewed in 1991 and amended in 1992. The proposed UGB and plan amendments do not address residential land needs. As indicated in Goal 9 findings and the Scappoose EOA (Attachment A), the proposal identifies land needed to meet applicable standards of Goal 9 and its implementing Administrative Rule (OAR 660-009).

12. *Have mutually agreed upon land use designations with each city.*

Council Findings: The City and County have coordinated land use designations since the initial adoption of the Comprehensive Plan in 1983. This policy continues to be met through County approval of this application.

16. *Coordinate the development of facilities by existing special districts to insure coordination with city plans.*

Council Findings: Public facilities requirements are addressed in Appendices 3 and 4.

17. *Adopt the urban growth boundaries, and those portions of the adopted comprehensive plans relating to the unincorporated urban growth areas, for the municipalities of Clatskanie, Columbia City, Rainier, Scappoose, St. Helens and Vernonia.*

Council Findings: This policy was met in 1983, and continues to be met through County approval of this application.

18. *Periodically update coordinated 20-year population forecasts for each city's urban growth boundary and for the unincorporated areas, based upon the projections of a regionally accepted population forecast, such as the studies prepared by the Portland State University and the BPA. The County's projection will be within 10% of the regionally accepted projection and the incorporated cities' projections will be allocated on a jurisdiction by jurisdiction basis.*

Council Findings: The County adopted a new coordinated population in 2009 (Ordinance No. 2009-7) that estimates the City of Scappoose's population to be 10,022 in 2030. As part of this project, Scappoose proposes to adopt the County's coordinated population projection into its Comprehensive Plan (Attachment A).

PART X | Economic Policies

It shall be a policy of the County to:

1. *Encourage the creation of new and continuous employment opportunities.*
2. *Encourage a stable and diversified economy.*

Council Findings: This proposal directly implements these policies through adoption of an EOA and providing opportunity for economic development.

8. *Reserve valuable industrial sites for industrial uses.*

Council Findings: This proposal implements this policy by providing employment land to meet needs identified in the EOA. The proposed East Airport Employment (EAE) overlay zone, and the proposed Airport Employment (AE) comprehensive plan designation both require the preservation of large industrial sites for industrial uses identified in the EOA.

10. *Support improvements in local conditions in order to make the area attractive to private capital investment. Consideration of such factors as the following shall be undertaken:*

A. Tax incentives

B. Land use controls and ordinances

C. Capital improvements programming

Council Findings: This proposal directly implements this policy by providing employment land that can be zoned and serviced.

12. *Encourage new industrial growth within the urban areas so as to utilize existing public facilities.*

Council Findings: This proposal enables more efficient development within the existing UGB through planning for redevelopment and providing overlay zones that allow for development of targeted industries identified in the EOA.

13. *Encourage industry which needs or can benefit from the locational advantages of an airport and its facilities, to locate adjacent to one of the airports in the County. Create an Airport Industrial district to facilitate this policy.*

Council Findings: This proposal directly implements this policy by providing employment land adjacent to the Scappoose Airpark, and through establishment of the AE plan designation.

PART XII | Industrial Development Policies

It shall be policy of the County to establish, implement, and maintain an industrial development program that:

1. *Encourages the creation of new and continuous employment opportunities.*
2. *Encourages a stable and diversified economy.*

Council Findings: This proposal directly implements these policies through adoption of an EOA and providing opportunity for economic development.

6. *Reserves valuable industrial sites for industrial use.*

Council Findings: This proposal implements this policy by providing employment land to meet needs identified in the EOA. The proposed East Airport Employment (EAE) overlay zone, and the proposed Airport Employment (AE) comprehensive plan designation both require the preservation of large industrial sites for industrial uses identified in the EOA.

7. *Support improvements in local conditions in order to make the area attractive to private capital investment.*

Council Findings: This proposal directly implements this policy by providing employment land that can be zoned and serviced.

9. *Assures land which is already used as industrial or irrevocably committed to industry shall be so designated.*

Council Findings: This proposal does not limit or impact existing industrial land uses.

PART XIII | Transportation Policies

8. *The two existing airports, in Scappoose and Vernonia, will be zoned with a landing field overlay zone that incorporates the height restrictions set by the Federal Aviation Administration. It will allow the development of airport related industrial uses.*

Council Findings: The zone required by this policy – the Public Use Airport Safety and Compatibility Overlay – is already in place, and is proposed to continue to apply where applicable.

Administrative Procedures Policies

9. *Revisions or amendments proposed within an urban growth boundary shall be in accordance with the Urban Growth Area Management Agreement adoption for that area.*

Council Findings: Future uses or changes in zoning within proposed expansion areas must comply with the UGMA, consistent with this policy.

Columbia County Comprehensive Plan Conclusion

The proposed plan amendment package is consistent with and implements the urbanization and employment policies of the Columbia County Comprehensive Plan.