

## **Ordinance 2024-02 Findings for the EOA**

**SMC Chapter 17.24 provides the criteria for Type IV Comprehensive Plan legislative amendments. The recommendation by the Planning Commission and the decision by the City Council shall be based on consideration of the following factors. The decision-making criteria and findings are as follows.**

### **Section 17.24.70. Review criteria.**

Comprehensive Plan amendments shall be reviewed to assure consistency with the purposes of this chapter, policies of the Comprehensive Plan, and any other applicable policies and standards adopted by the City Council. Amendments shall be approved only when the following findings are made:

A. The change being proposed is the best means of meeting the identified public need; and

**The findings for criteria A are addressed for the EOA.**

1. City governments are responsible for the development of local comprehensive plans. The City is addressing the “Plan Amendment and Update Polices” of the Comprehensive Plan by considering the adoption of a new Economic Opportunities Analysis (EOA) report. Development Services staff believe that this technical report is the best means of meeting the requisite for a comprehensive, up-to-date plan for developing and maintaining the City’s economic development needs. As Sandy is anticipated to continue to grow in employment, this plan appropriately addresses forecasted needs using industry best practices in assessments and recommendations.

**Conclusion: Criteria met.**

B. The change conforms to all applicable Statewide Planning Goals.

**The findings for criteria B pertaining to the EOA are evaluated separately as analyzed in findings 2 through 6.**

### **Goal 1: Citizen Involvement**

2. Public involvement is a required part of land use planning in Oregon. This requirement is one of the things that make Oregon's land use planning program unique. The requirement for public participation is written in the first goal of nineteen in the statewide land use planning system.

Goal 1 calls for "the opportunity for citizens to be involved in all phases of the planning process."

***Findings:*** The City has discussed this topic openly at multiple joint City Council/ Planning Commission meetings and the City will hold public hearings before both the Planning Commission and City Council to afford the public the opportunity to be involved. Notice of the two hearings was posted in multiple public places, published in the Sandy Post, posted on the City’s website, and promoted in the monthly City Newsletter. Notice was provided to the Department of Land Conservation and Development on November 30, 2023. The City created a Technical Advisory Group for the purpose of reviewing the consultants work and to have multiple opportunities for input. Besides staff, the group consisted of the executive director at the chamber of commerce and a few local business owners. Goal 1 public involvement requirements related to the EOA are met.

### **Goal 2: Land Use**

3. Goal 2 requires each local government in Oregon to have and follow a comprehensive land use plan and implementing regulations. Cities and counties must build their comprehensive plans on a factual base and follow their plan when making decisions on appropriate zoning.

***Findings:*** The proposed Economic Opportunities Analysis (EOA) report will create policy that will remove uncertainty surrounding specific economic development needs while maintaining desired community outcomes. The EOA assists the City in compiling strong policies in the comprehensive land use plan and implementing regulations. The completion of the EOA report fulfills Statewide Land Use Planning Goal 2 by building the City’s comprehensive plan on a factual base where the City can follow their plan when making decisions on appropriate zoning.

This will assist in creating comprehensive plan policies that are consistent with State law and will have the long-term effect of providing economic development options that meet the needs of all Sandy residents. Goal 2 land use requirements related to the EOA are met.

### **Goal 9: Economy**

4. The purpose of Goal 9 planning is to make sure cities and counties have enough land available to realize economic growth and development opportunities. Commercial and industrial development takes a variety of shapes and leads to economic activities that are vital to the health, welfare, and prosperity of Oregon's citizens. To be ready for these opportunities, local governments perform Economic Opportunity Analyses based on a 20-year forecast of employment growth.

***Findings:*** Sandy’s Economic Opportunities Analysis (EOA) report is consistent with the requirements of statewide planning Goal 9 and the Goal 9 administrative rules (OAR 660-009). Goal 9 describes the EOA as “an analysis of the community’s economic patterns, potentialities, strengths, and deficiencies as they relate to state and national trends” and states that “a principal determinant in planning for major industrial and commercial

developments should be the competitive advantage of the region within which the developments would be located.”

The primary goals of the EOA are to (1) project the amount of future employment growth within the Sandy city limits and employment land areas in the Urban Growth Boundary (UGB) between 2023 and 2043, (2) evaluate the existing employment land supply within Sandy to determine if it is adequate to meet that need, and (3) to fulfill state planning requirements for a twenty-year supply of employment land. The proposed EOA updates the following:

- 1) Employment Forecast for the planning period (2023-2043);
- 2) Employment and Land Demand; and,
- 3) The Buildable Lands Inventory.

### Employment Forecast

Sandy’s employment base is 5,514 employees in 2023. Sandy is forecast to have 8,037 employees by 2043. This is an increase of 2,523 jobs over the planning period.

Most new employment will require commercial and industrial lands, accounting for over 90% of new employment growth (2,339 employees) over the 2023 and 2043 planning period. Sandy will accommodate new government employees (184 of the 2,523 employees) in existing government buildings and areas designated for public use.

### Employment and Land Demand

The forecast for land needed to accommodate employment growth in Sandy shows that the growth of 2,523 new employees will result in demand for about 154 gross acres of commercial and industrial employment lands. Sandy has sufficient land to accommodate demand for commercial employment in the Sandy UGB, but it does not have sufficient land to accommodate demand for industrial employment. Based on land demand, Sandy is forecast to have a 52-gross-acre surplus of commercial land and a 9-gross-acre deficit of industrial land.

### The Buildable Lands Inventory

The buildable lands inventory is intended to identify commercial and industrial lands that are available for development for employment uses within the Sandy UGB. The inventory is sometimes characterized as supply of land to accommodate anticipated employment growth. Population growth and employment growth both drive demand for land.

## **Land Base**

The land base for the Sandy employment Buildable Lands Inventory (BLI) includes all tax lots in the Urban Growth Boundary (UGB) in plan designations that allow for employment. Some tax lots in these plan designations are in zones that do not currently permit commercial or industrial development, such as Single-Family Residential (SFR), Parks & Open Space (POS), and High Density Residential (R-3). These tax lots were still designated as eligible for development due to development status being applied based on the comprehensive plan designation.

Exhibit 14 in the EOA shows the land base by plan designation in the UGB.

Exhibit 14. Employment Land Base by Plan Designation, Sandy UGB, 2022

Plan Designation/Zone	Number of taxlots	Percent	Total taxlot acreage	Percent (total acreage)
<b>Commercial</b>	<b>364</b>	<b>83%</b>	<b>384</b>	<b>65%</b>
Central Business District (C-1)	231	53%	54	9%
General Commercial (C-2)	130	30%	329	56%
Parks & Open Space (POS)	2	0%	0	0%
SFR - Single Family Residential (SFR)	1	0%	0	0%
<b>Industrial</b>	<b>65</b>	<b>15%</b>	<b>195</b>	<b>33%</b>
Industrial Park (I-1)	17	4%	39	7%
Light Industrial (I-2)	33	8%	76	13%
General Industrial (I-3)	14	3%	80	14%
High Density Residential (R-3)	1	0%	0	0%
<b>Village Commercial</b>	<b>7</b>	<b>2%</b>	<b>9</b>	<b>2%</b>
Village Commercial (C-3)	7	2%	9	2%
<b>Total</b>	<b>436</b>	<b>100%</b>	<b>588</b>	<b>100%</b>

Source: ECONorthwest analysis, City of Sandy, Clackamas County

## Buildable Area Status

Exhibit 15 in the EOA shows the total acres of commercial and industrial tax lots classified by development status. The EOA uses a rule-based classification to define an initial development status. Development status was confirmed through a series of reviews by ECONorthwest and City staff, based on local knowledge and review of aerial maps.

Exhibit 15. Employment Acres by Classification and Plan Designation, Sandy UGB, 2022

Plan Designation/Zone	Total Acres	Committed Acres	Constrained Acres	Buildable Acres Unconstrained Vacant & Partially Vacant
<b>Commercial</b>	<b>384</b>	<b>168</b>	<b>84</b>	<b>132</b>
Central Business District (C-1)	54	48	6	1
General Commercial (C-2)	329	120	78	131
<b>Industrial</b>	<b>195</b>	<b>92</b>	<b>49</b>	<b>54</b>
Industrial Park (I-1)	39	26	9	4
Light Industrial (I-2)	76	57	11	8
General Industrial (I-3)	80	9	29	42
<b>Village Commercial</b>	<b>9</b>	<b>3</b>	<b>1</b>	<b>6</b>
Village Commercial (C-3)	9	3	1	6
<b>Total</b>	<b>588</b>	<b>263</b>	<b>134</b>	<b>191</b>

Source: ECONorthwest analysis, City of Sandy, Clackamas County Note: The POS, SFR, and R3 zones are not shown because they accounted for only fractions of an acre and no buildable acreage. Additionally, values are rounded to the nearest whole number. Therefore, value sums may appear to be off by a value of one.

## Vacant Buildable Land

Exhibit 18 in the EOA shows buildable acres (i.e., acres in tax lots after constraints are deducted) for vacant and partially vacant land by plan designation. It should be noted that tax lots shown as partially vacant do not distinguish the part of the tax lot that is unavailable for development.

Exhibit 18. Buildable Acres in Vacant/Partially Vacant Tax Lots by Plan Designations, Sandy UGB, 2022

Plan Designation/Zone	Total Buildable Acres	Buildable Acres on Vacant Lots	Buildable Acres on Partially Vacant Lots
<b>Commercial</b>	<b>132</b>	<b>51</b>	<b>81</b>
Central Business (C-1)	1	-	1
General Commercial (C-2)	131	51	81
<b>Industrial</b>	<b>54</b>	<b>23</b>	<b>30</b>
Industrial Park (I-1)	4	4	-
Light Industrial (I-2)	8	2	5
Heavy Industrial (I-3)	42	17	25
<b>Village Commercial</b>	<b>6</b>	<b>2</b>	<b>3</b>
Village Commercial (C-3)	6	2	3
<b>Total</b>	<b>191</b>	<b>76</b>	<b>115</b>

Source: ECONorthwest analysis, City of Sandy, Clackamas County Note: The POS, SFR, and R3 zones are not shown because they contained no buildable acres. Additionally, values are rounded to the nearest whole number. Therefore, value sums may appear to be off by a value of one.

Comparing this inventory to the 20-year forecast of employment land needs generated earlier in this analysis indicates that the City of Sandy’s UGB does have the adequate land capacity to accommodate its forecasted needs over the planning horizon of 2023-2043 for commercial development. The overall projected demand for employment land in aggregate

industrial land over the planning horizon exceeds the estimated developable inventory by 9 acres.

Some of this anticipated industrial land deficit can be met on commercial land, assuming the manufacturing or production use does not produce significant levels of noise or odor. Sandy has few opportunities for midsized and larger industrial opportunities, which may create barriers to growth of manufacturing and related uses. This anticipated industrial deficit can also be accommodated through increases in land use efficiency within the existing UGB.

The City will add additional goals and policies relating to Economic Development in the Envision Sandy 2050 Comprehensive Plan. The BLI has a range of strategies and action items that the City may consider that are consistent with the findings in the EOA report and may add all or most of them into the Comprehensive Plan. Goal 9 economy requirements related to the EOA are met.

### **Goal 11: Public Facilities**

5. This goal is to establish policies 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.

***Findings:*** The City's comprehensive plan contains an acknowledged Goal 11 element that contains policies to ensure sufficient and adequate public services are available (or will be available as appropriate) to serve lands within the UGB.

Sandy will need to address wastewater system deficiencies to support future employment growth. To meet projected demand, Sandy has plans to fix aging sewer pipes, upgrade Sandy's existing treatment plant, and expand Sandy's wastewater system capacity, including potentially establishing an alternative discharge location. Sandy's plans for its wastewater system upgrades will allow Sandy to accommodate the types and amounts of growth forecast in the EOA. Goal 11 public facility requirements related to the EOA are met.

### **Goal 12: Transportation**

6. This goal is to establish policies to provide and encourage a safe, convenient, and economic transportation system.

***Findings:*** The City's Comprehensive Plan with respect to Goal 12, its transportation system plan, and its standards governing transportation and transportation-related facilities are not affected by this decision. The City's comprehensive plan contains an acknowledged Goal 12 element that contains policies to ensure sufficient and adequate transportation

facilities and services are available (or will be available as appropriate) to serve lands within the UGB. It should be noted that the TPR is triggered when a post acknowledgment amendment “significantly affects” a transportation facility. The City finds that the EOA does not meet the definition of a “significant effect” pursuant to OAR 660-012-0060(1)(a)-(c) because it will not: (1) change the functional classification of an existing or future facility; (2) change the standards implementing the functional classification system; or (3) result in any of the effects listed in 0060(1)(c)(A)-(C). Goal 12 transportation requirements related to the EOA are met.