
Tualatin Heights Apartments Plan Map Amendment

Prepared by Angelo Planning Group

On behalf of UDR, Inc.

Submitted to City of Tualatin

September 16, 2021



TABLE OF CONTENTS

PROPOSAL SUMMARY INFORMATION	2
PROJECT TEAM	3
SECTION 1: PROJECT INFORMATION	1
SECTION 2: COMPLIANCE WITH STATEWIDE PLANNING GOALS	9
SECTION 3: COMPLIANCE WITH THE TUALATIN COMPREHENSIVE PLAN (TUALATIN 2040)	13
SECTION 4: COMPLIANCE WITH THE TUALATIN DEVELOPMENT CODE	16
SECTION 6: CONCLUSION	27

LIST OF EXHIBITS

- Exhibit A: Conceptual Site Plan
- Exhibit B: Neighborhood/Developer Meeting Documentation
- Exhibit C: Tualatin Heights Parking Assessment
- Exhibit D: Transportation Planning Rule Analysis Memorandum
- Exhibit E: Tualatin School District Impact Analysis
- Exhibit F: Proof of Ownership - Title Report
- Exhibit G: Pre-Application Summary

Proposal Summary Information

Applicant:	Andrew Lavaux UDR, Inc. 1745 Shea Center Drive, Suite 200 Highlands Ranch, CO 80129 310.463.3211 alavaux@udr.com
Applicants Representative:	Frank Angelo Angelo Planning Group 921 SW Washington Street, Suite 468 Portland, Oregon 97205 503.227.3664 fangelo@angeloplanning.com
Request:	Plan Map Amendment from RML to RMH
Site Address:	9301 SW Sagert Street
Tax Lot:	2S123DC00600
Site Size:	22.30 acres
Current Site Planning District:	Medium Low Density Residential (RML)
Proposed Site Planning District:	Medium High Density Residential (RMH)

Project Team

Owner Representative

UDR Inc.
1745 Shea Center Drive, Suite 200
Highlands Ranch, CO 80129

Andrew Lavaux
310.463.3211
alavaux@udr.com

Land Use

Angelo Planning Group
921 SW Washington Street, Suite 468
Portland, Oregon 97205

Frank Angelo, Principal
503.227.3664
fangelo@angeloplanning.com

Emma Porricolo, Assistant Planner
503.542.3405
eporricolo@angeloplanning.com

Architecture

Hennebery Eddy Architects, Inc.
921 SW Washington Suite 250
Portland, OR 97205

Jon McGrew, Associate Principal
503.542.1180
jmcgrew@henneberyeddy.com

Erica Thompson, Associate
971.200.7236
ethompson@henneberyeddy.com

Transportation

Kittelson and Associates, Inc.
851 SW 6th Avenue, Suite 600
Portland, OR 97204 USA

Matt Hughart, Principal Planner
503.535.7425
mhughart@kittelson.com

Civil Engineering

KPFF Consulting Engineers
111 SW 5th Ave #2600
Portland, OR 97204

Mark Reuland, Principal
503.542.3860
mark.reuland@kpff.com

Section 1: Project Information

Background

Proposal

Tualatin Heights is a multi-family apartment complex located at 9301 SW Sagert Street, Tualatin, Oregon. The existing development includes 220 multi-family dwellings on 22.4 acres. The property is currently zoned Residential Medium Low (RML), with a maximum density of 10 dwelling units per acre. The property owner, UDR Inc. (UDR), is requesting a Plan Map Amendment (PMA) to allow for Residential Medium-High Density (RMH) on the site, increasing the allowed density to 15 dwelling units per acre for a maximum of 336 units. With an approved PMA, UDR plans to add up to 116 additional dwelling units to the site to more efficiently use the 22-acre site.

The existing and proposed Planning Districts have few differences in siting standards as they relate to multi-family development on the site. For the site's use, multi-family dwellings, the PMA would increase the maximum density from 10 units per acre to 15 units per acre. Other siting standards remain the same across both planning districts, as shown in Table 1.

Table 1. Standards for Multi-family Development in Existing and Proposed Planning Districts.

Standards	Medium Low Density Residential (RML)	Medium High Density Residential (RMH)
Maximum Density	10 units per acre	15 units per acre
Front Setback	35 feet	35 feet
Side & Rear Setbacks	12 feet	12 feet
Maximum Structure Height	35 feet	35 feet
Maximum Lot Coverage	40%	40%

Note: Setbacks described above are for a 2.5 story structure, the maximum permitted in both zones.

Site Context

The 22-acre site is located at 9301 SW Sagert Street (Figure 1: Location Map). The site abuts both a residential neighborhood and a business park. Surrounding the site are:

- To the west (across SW 95th Ave): Industrial businesses zoned Light Manufacturing (ML);
- To the south (across SW Sagert St): detached single family homes, zoned RML;
- To the east : detached single family homes, zoned RML; and
- To the north (across railroad tracks): business park with primarily commercial businesses, zoned ML.

Within the vicinity of the site are various community attractions and services, including, but not limited to:

- Tualatin Elementary School,
- Tualatin Town Center,
- Commercial and Industrial Corridors on SW Tualatin-Sherwood Road and SW Teton Ave,
- Ten Tri-met bus stops within ¼ mile of the site, and
- Tualatin WES Station.

Figure 1. Location Map

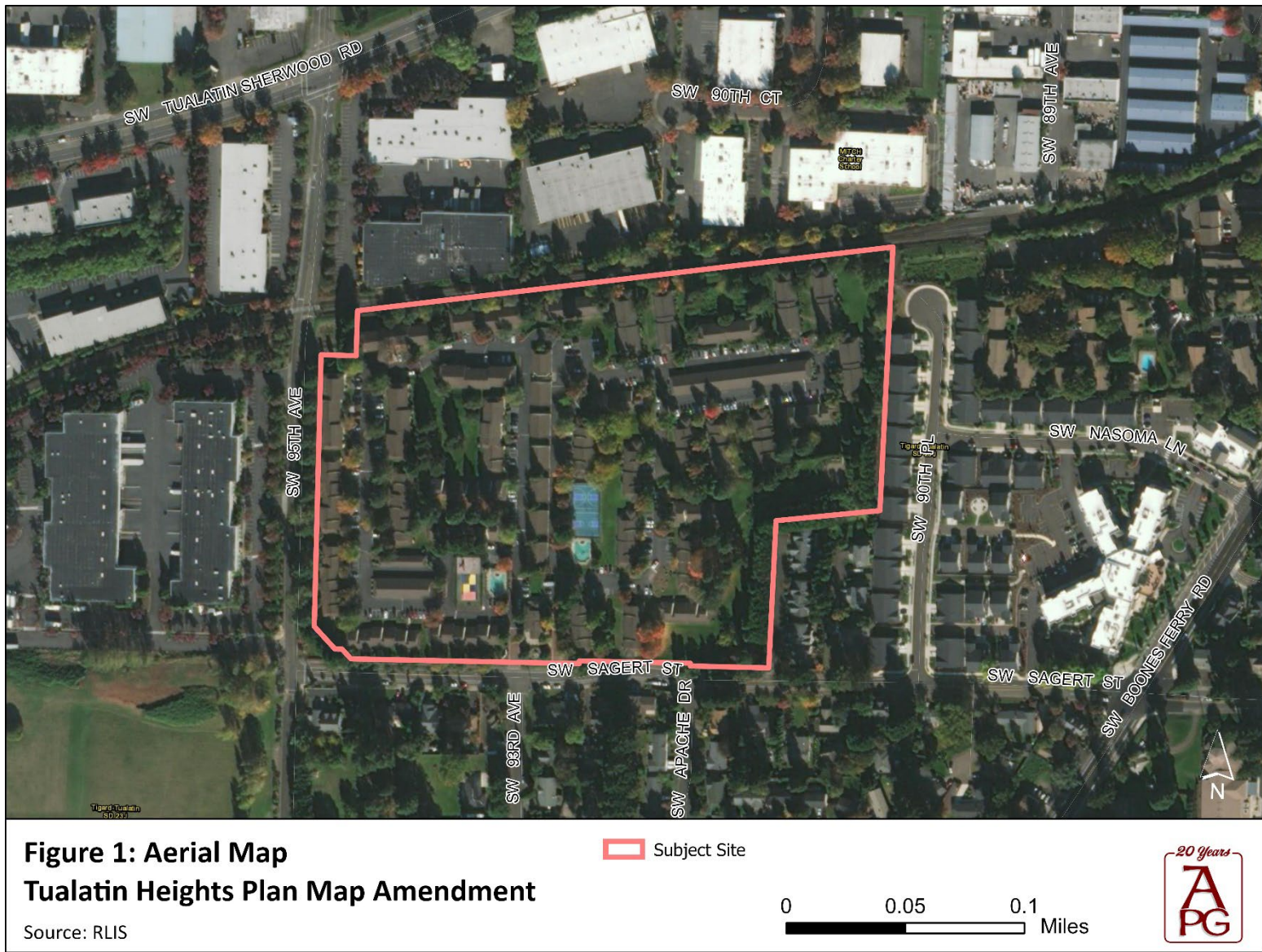


Figure 2. Vicinity Map

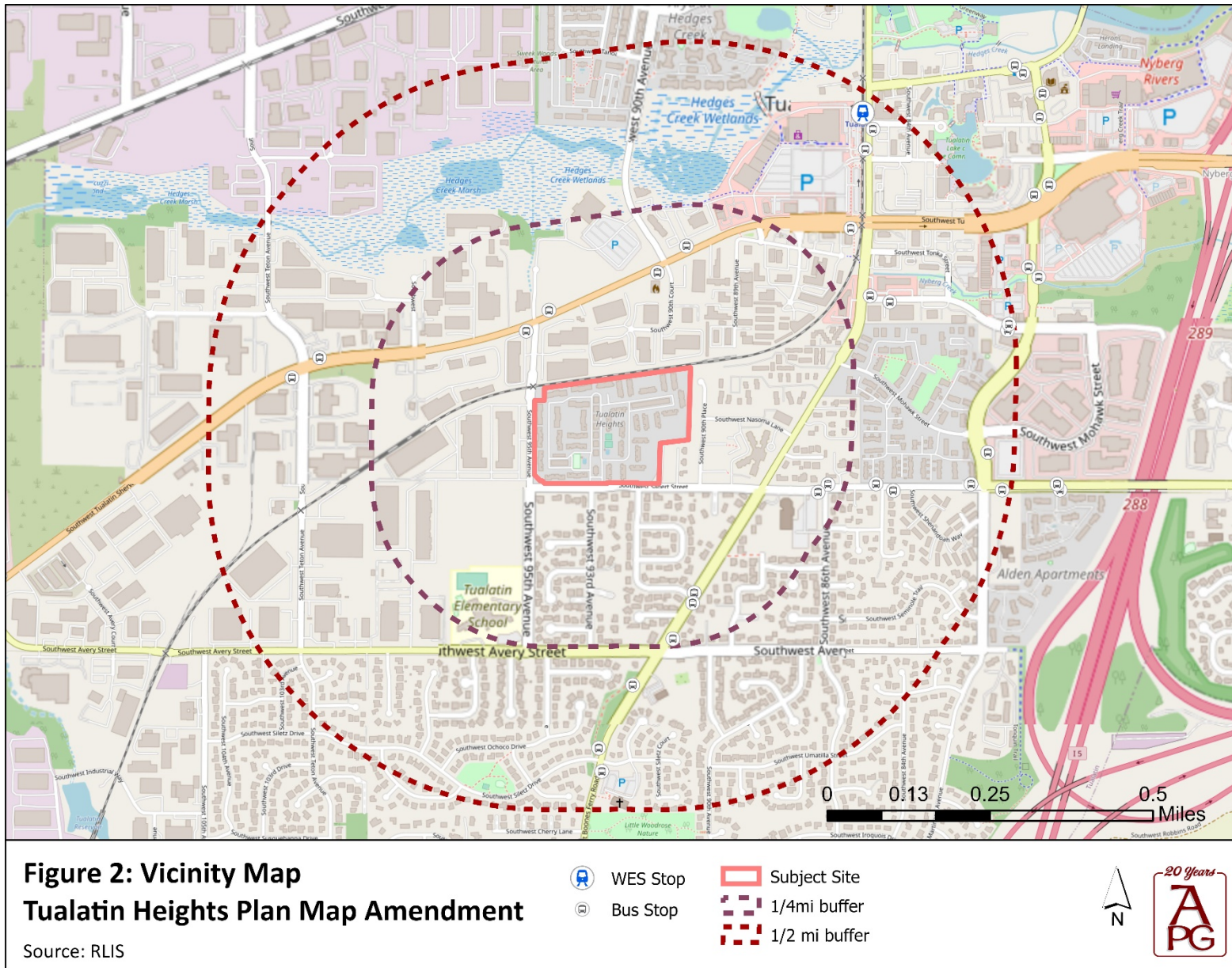




Figure 2: Vicinity Map
Tualatin Heights Plan Map Amendment

Source: RLIS

-  WES Stop
-  Bus Stop




-  Subject Site
-  1/4mi buffer
-  1/2 mi buffer



Figure 3. Existing Planning District

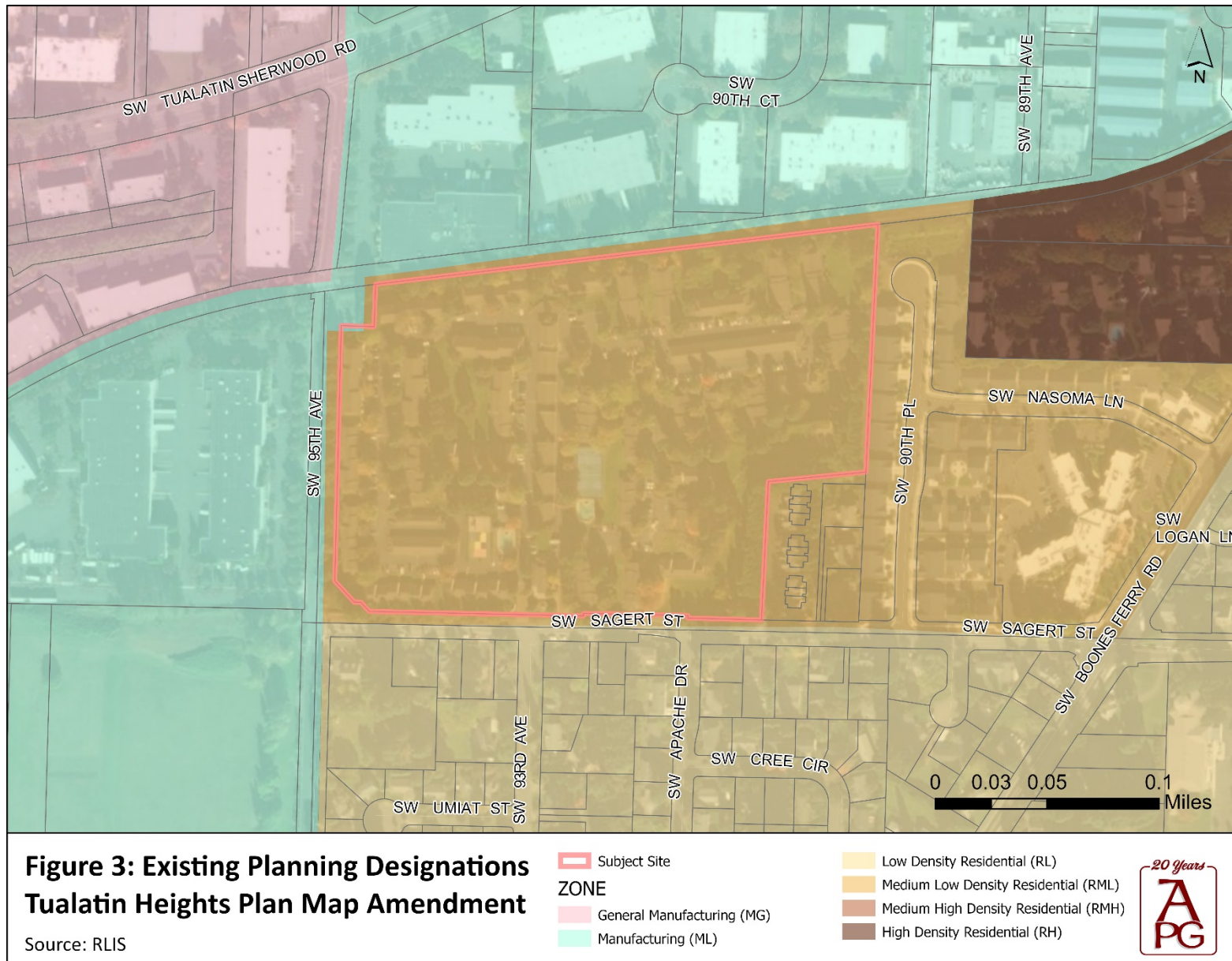
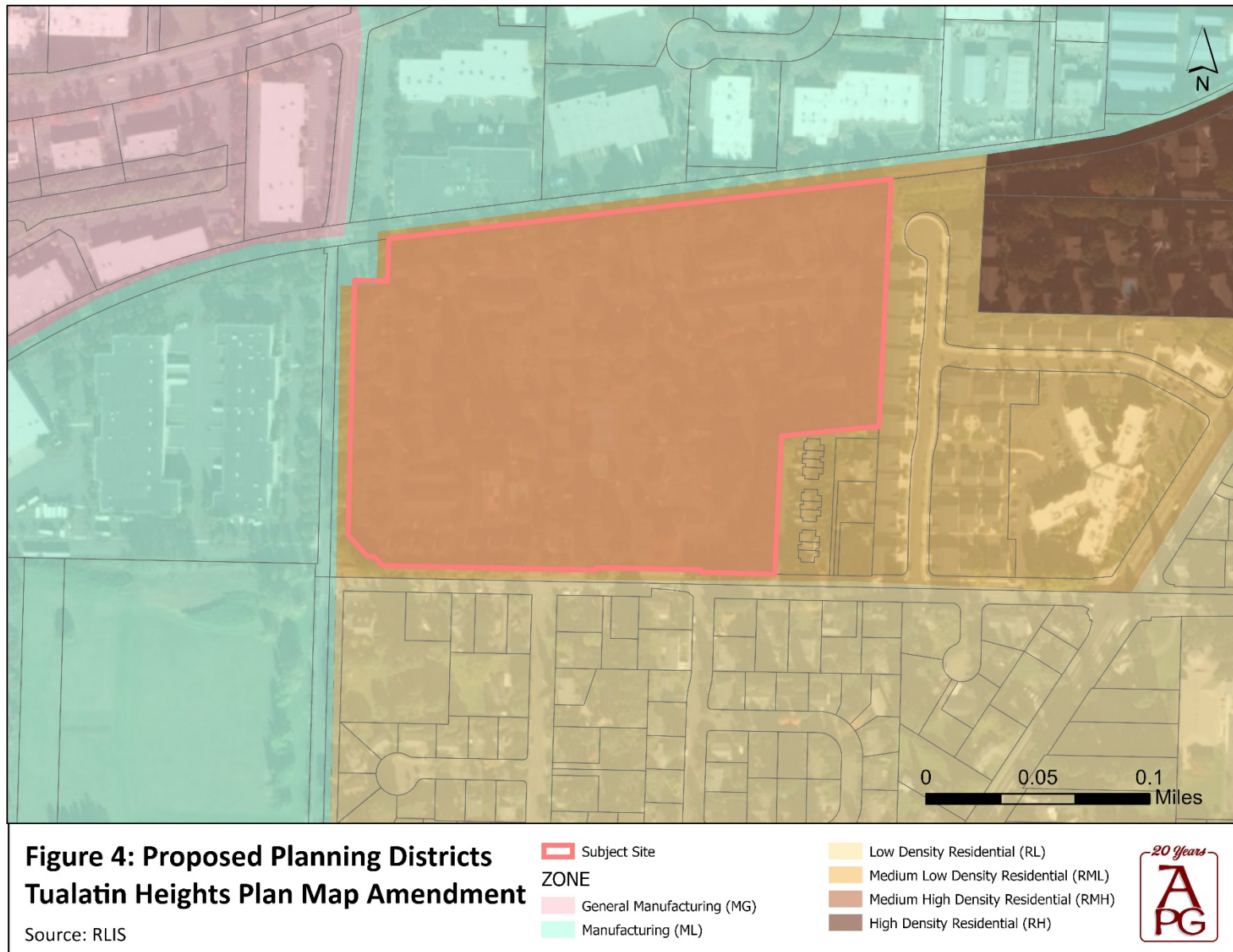


Figure 4. Proposed Planning District



Request

The requested Plan Map Amendment would increase the maximum permitted density on the site. With the increased density allowance, the applicant would like to redevelop portions of the complex internal to the site to create additional dwelling units. Findings of the Tualatin Housing Needs Analysis (HNA), completed in 2019, supports the need for additional multi-family housing in the City consistent with this proposed amendment request. The report demonstrates a need for multi-family dwelling units and land with medium- to high-density planning designations. As shown in Table 2 (Source: HNA), Tualatin has a surplus of dwelling unit capacity in the RML designation, with surplus capacity for approximately 315 units and 27 gross acres of land to accommodate growth. Meanwhile, there is a deficit of land for dwelling units in the RMH designation. A deficit of 109 dwelling units or 7 gross acres of land. In addition to the deficit, there is also a demand for 122 units in the RMH district (Source: See Table 2). The proposed amendment would provide potential capacity for an additional 116 dwelling units on the existing site and reduce the documented deficit of the RMH district.

In addition to the specific plan designations capacity needs, Tualatin has an overall citywide need for multi-family dwellings. According to the HNA,

“Tualatin will plan for more single-family attached and multi-family dwelling units in the future to meet the City’s housing needs. Historically, about 53% of Tualatin’s housing was single-family detached. While 40% of new housing in Tualatin is forecast to be single-family detached, the City will need to provide opportunities for development of new single-family attached (15% of new housing) and multi-family units (45% of new housing).”

According to the HNA, several demographic trends contribute to the need for “relatively affordable attached single-family housing and multi-family housing,” they are:

- *Demographic and economic trends will drive demand for relatively affordable attached single-family housing and multi-family housing in Tualatin. The key demographic trends that will affect Tualatin’s future housing needs are: (1) the aging of the Baby Boomers, (2) aging of the Millennials, and (3) continued growth in the Latinx population.*
- *As the Baby Boomers age, growth of retirees will drive demand for housing types specific to seniors, such as small and easy-to-maintain dwellings, assisted living facilities, or age-restricted developments.*
- *Tualatin’s ability to retain Millennials will depend on whether the city has opportunities for housing that both appeals to and is affordable to Millennials.*
- *Growth in the number of Latinx households will result in increased demand for housing of all types, both for ownership and rentals, with an emphasis on housing that is comparatively affordable. Latinx households are more likely to be larger than average, with more children and possibly with multigenerational households. (Source: 2019 HNA)*

As described in Goal 3.2 of the Comprehensive Plan, “Encourage development and preservation of housing that is affordable for all households in Tualatin,” Tualatin encourages housing for all that is

affordable and meets the needs of all its residents. The demographic trends reflect a diversity of residents (in age and race) that have diverse housing needs.

Table 2. Comparison of Plan Designation Capacities (Source: HNA Exhibit 4.)

Exhibit 4. Comparison of capacity of existing residential land with demand for new dwelling units and land surplus or deficit, Tualatin City Limits and Basalt Creek, 2020 to 2040
 Source: Buildable Lands Inventory; Calculations by ECONorthwest. Note: DU is dwelling unit.

Residential Plan Designations	Capacity (Dwelling Units)	Demand for New Housing	Remaining Capacity (Supply minus Demand)	Land Surplus or (Deficit) Gross Acres
Low Density	523	466	57	10
Medium Low Density	386	71	315	27
Medium High Density	13	122	(109)	(7)
High Density	285	254	31	2
High Density High-Rise	-	101	(101)	(4)

This application requests the following Plan Map Amendment to change the Tualatin Heights designation from Medium Low Density Residential (RML) to Medium High Density Residential (RMH), subject to a Type VI-A review. The requested zone change would allow for an additional 116 units on the subject site, where the applicant plans to add additional multi-family units. A conceptual site plan showing how additional units can be developed is provided in Exhibit A.

Section 2: Compliance with Statewide Planning Goals

This section responds to the applicable Oregon Statewide Planning Goals.

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.

Response: Pursuant to the City of Tualatin requirements, a Neighborhood/Developer Meeting was held on June 9, 2021. A summary of the meeting is found in Exhibit B. Neighbors expressed specific concerns related to vehicle parking. The applicant heard these concerns, conducted a parking study, and is proposing the action noted in the Parking Assessment prepared by Kittelson & Associates. The assessment evaluated on-site and off-site parking conditions to improve understanding of the current conditions and to inform the parking management strategy. It also describes the current parking management policies for on-site parking.

A review of the on-street and apartment complex parking conditions revealed the following key findings:

- During the mid-week and Saturday time periods, existing on-street parking occupancy on the neighborhood street segments is never more than 54% utilized when looking at the collective whole. However, some segments along SW Sagert Street (between SW 95th Avenue and SW 93rd Avenue) have parking occupancy levels at 100% or close to 100% for most the study periods. It is unknown if the on-street parking is being generated by the adjacent single family homes, Tualatin Heights residents, or a combination of both.
- The total active parking supply within the Tualatin Heights apartment complex (excluding stalls available within the parking garage units that are primarily being used for storage) is 457 spaces.
- Peak apartment complex parking utilization was found during the 5:00-6:00 AM study period (79% during a mid-weekday and 81% on a Saturday). These findings indicate that the parking supply exceeds current demand.

For more information, the complete Parking Assessment is found in Exhibit C.

The application requires a Planning Commission and City Council hearing. Both public hearings will provide the opportunity for community members to provide comments on the application.

The proposed amendment is consistent with Goal 1.

Goal 2 – Land Use Planning

To establish a land use planning process and policy framework as a basis for all decision and actions related to use of land and to assure an adequate factual base for such decisions and actions. [...]

Response: The applicable Tualatin Comprehensive Plan and Development Code standards have been addressed in this application. The application will be reviewed pursuant to the Type VI-A review procedures for Plan Map Amendments.

The proposed amendment is consistent with Goal 2.

Goal 10 – Housing

To provide for the housing needs of citizens of the state.

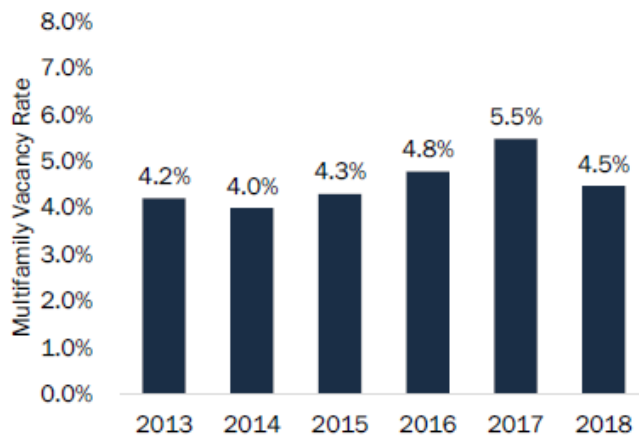
Response: The maximum permitted density would be increased on the site with the requested PMA, increasing the maximum density from 10 dwelling units per acre to 15 dwelling units per acre. This would add the potential for an additional 116 dwelling units through redevelopment of the Tualatin Heights site. The need for and importance of more multi-family units in Tualatin is supported by the HNA prepared in 2019. According to the HNA, Tualatin’s housing stock had a larger percentage of multi-family housing (42% of Tualatin’s housing stock) as compared to Washington County and Portland Metro region. However, the HNA also identified the need for more multi-family housing to meet the housing needs of a diverse range of Tualatin residents and provide housing opportunities for many of Oregon’s low-wage workers. According to the HNA, *“Tualatin’s key challenge over the next 20 years is providing opportunities for development of relatively affordable housing of all types, such as lower-cost single-family housing, townhouses and duplexes, market-rate multi-family housing, and government-subsidized affordable housing.”*

In addition, the extremely low vacancy rates for multi-family housing, see Table 3, shows there is strong demand for multi-family housing in Tualatin.

Table 3. Average Multi-family Vacancy Rates in Tualatin (Source: 2019 HNA)

Tualatin’s average multifamily vacancy rate dipped to a low of 4% in 2014. In 2018, Tualatin’s multifamily vacancy rate was 4.5%.

Exhibit 25. Average Multifamily Vacancy Rate, Tualatin, 2013 through 2018
Source: CoStar.



The proposed amendment will provide the opportunity for additional multi-family residential dwelling units in the City through a more efficient use of an existing site that is already a committed multi-family development.

The proposed Plan Map amendment is consistent with Goal 10.

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.

Response: The proposed development is located within the Tualatin city limits. As a part of this application the applicant’s engineer prepared a reconnaissance analysis to determine if existing infrastructure is sufficient with the proposed increased density permitted by the PMA. The analysis determined that the infrastructure capacity is sufficient to accommodate the additional housing that would result from the PMA. A more detailed analysis of infrastructure would occur during subsequent permitting for development on the site. For more information, see the responses to the Tualatin Comprehensive Plan Chapter 8 policies in Section 3 of this narrative.

The proposed amendment is consistent with Goal 11.

Goal 12 – Transportation

To provide and encourage a safe, convenient and economic transportation system.

Response: Statewide Planning Goal 12 is implemented by the Transportation Planning Rule, OAR 660-012 (TPR). The applicant conducted a traffic assessment to determine future transportation conditions under the current zoning and under the proposed zoning. The following is the summary of the findings of that assessment. The full traffic assessment is presented in Exhibit D.

Existing Transportation Conditions

- Traffic counts were collected in June 2021 at all of the study intersections during the critical weekday AM and PM peak travel periods. Historical 2019 counts were supplemented at several key intersections in order to account for travel demand reductions associated with on-going COVID-related factors.
- Operational analyses indicate that all of the study intersections currently operate acceptably based on the applicable City of Tualatin and Washington county standards.

Future Year 2040 Traffic Conditions

- The proposed land use action is a unique case that would involve upzoning the Tualatin Heights apartment complex property. The complex is approximately 22 acres in size and contains 220-unit multifamily apartment units. The underlying

zoning is Residential Medium Low (RML) which currently allows for a maximum density of 10 dwelling units per acre. Accordingly, the Tualatin Heights apartment complex is essentially maximizing the allowed development potential under the existing zoning. In order to support a vision for additional housing units on the site, the property owner is proposing to modify the zoning to Residential Medium-High Density (RMH) which would increase the density to a maximum of 15 dwelling units per acre.

- Background traffic volumes for the 2040 planning horizon year were estimated using a combination of regional travel demand model output and historical growth trends. Since the existing site is built out to its maximum allowed density, the resulting 2040 background traffic volumes represent the future traffic conditions that can be expected under the existing RML zoning.
- Operations of the study intersections under 2040 Background conditions (assuming regional and local traffic growth but no land use action on the Tualatin Heights site) found that all of the study intersections are forecast to continue to operate acceptably during both the weekday AM and PM peak hours with the exception of the SW Boones Ferry Road/SW Sagert Street intersection. During the weekday AM Peak hour, this intersection is forecast to operate over capacity (v/c of 1.09) and at Level of Service F conditions.
- With the proposed RMH zoning, it was determined that the increased density allowance can potentially result in 116 additional multifamily housing units. Using ITE land use code 221, this increased density has the potential to generate approximately 630 net new daily trips, 42 net new AM peak hour trips, and 51 net new PM peak hour trips.
- Operations of the study intersections under the 2040 proposed RMH zoning scenario found that all of the study intersections are forecast to operate acceptably during both the weekday AM and PM peak hours with the continued exception of the SW Boones Ferry Road/SW Sagert Street intersection. During the weekday AM Peak hour, this intersection is forecast to also operate over capacity (v/c of 1.10) and at Level of Service F conditions. While a very small degradation in operations compared to existing zoning, this technically represents an impact to the operations of the intersection. To address TPR requirements, the identification of a long-term mitigation plan would be needed to restore capacity to the intersection and show it can meet operating standards.
 - Although not formally included in the City of Tualatin's latest Transportation System Plan project list, the future year analysis behind the study did identify the potential for a northbound right-turn lane at the intersection. Such an improvement would restore capacity to the intersection and result in acceptable operations under both the 2040 no land use action and with the 2040 proposed RMH rezone.

The proposed amendment is consistent with Goal 12.

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.

Response: The subject site is located inside the Tualatin city limits and the Metro UGB. The proposed PMA from RML to RMH for the Tualatin Heights Apartment site will permit more density on the site, allowing up to an additional 116 units on the 22-acre site. The PMA will provide the opportunity to more efficiently use an existing site that is already committed to multi-family residential use. Public facilities to serve the additional dwelling units are already in-place and have sufficient capacity to accommodate the new units.

The proposed amendment is consistent with Goal 14.

Section 3: Compliance with the Tualatin Comprehensive Plan (Tualatin 2040)

This section responds to the applicable policies and goals of the Tualatin Comprehensive Plan.

Chapter 1 – Community Involvement

POLICY 1.1.3 Conduct the planning process with adequate input and feedback from citizens in each affected neighborhood.

Response: The applicant hosted a Neighborhood/Developer Meeting to inform and received feedback from neighbors. A summary of the meeting can be found in Exhibit B. Pursuant to City of Tualatin requirements, the application will be reviewed through a Type VI-A process that includes public hearings at Planning Commission and City Council.

The proposed amendment is consistent with the policy.

Chapter 3 - Housing

POLICY 3.1.2 ZONING FOR MULTI-FAMILY. Provide zoning for multi-family development, which may be located in areas adjacent to transit.

Response: The site's use is multi-family housing, which is permitted in the current plan designation – RML. The proposed PMA would result in a RMH designation, which allows a higher density of multi-family development and would permit an additional 116 units on the 22-acre site. The site is located near several mass transit options. As shown in Figure 2, there are nine (9) bus stops located within a quarter mile from the site. Additionally, the Westside Express Service (WES) Tualatin station is located approximately a half mile from the site. The proposed amendment is consistent with the goal.

The proposed amendment is consistent with the policy.

GOAL 3.2 HOUSING FOR ALL. Encourage development and preservation of housing that is affordable for all households in Tualatin.

Response: Tualatin Heights Apartments is a multi-family housing complex that provides an alternative and typically a more affordable housing option to single-family detached housing for those who cannot afford a detached-single family home or prefer an alternative. The City's HNA prepared in 2019 detailed the demographic trends and groups that are more likely to live in multi-family housing.

The proposed PMA would allow development that would further enhance the choice of housing options in Tualatin as well as increase the availability of multi-family housing.

The proposed amendment is consistent with the goal.

GOAL 3.5 HOUSING AND TRANSPORTATION. Encourage development and redevelopment in Tualatin that supports all modes of transportation, including walking, biking, and mass transit.

Response: The proposed PMA will provide the opportunity to redevelop portions of the existing Tualatin Heights apartment complex and provide increased housing opportunities and density. Additional density typically supports transit service and alternative transportation options such as walking and biking. The site is located near several mass transit options. As shown in Figure 2, there are nine (9) bus stops located within a quarter mile from the site. Additionally, the Westside Express Service (WES) Tualatin station is located approximately a half mile from the site.

The proposed amendment is consistent with the goal.

Chapter 8 – Transportation

GOAL 8.1 ACCESS AND MOBILITY. Maintain and enhance the transportation system to reduce travel times, provide travel time reliability, provide a functional and smooth transportation system, and promote access for all users.

Response: Exhibit D demonstrates compliance with the TPR with policies that regulate safe, efficient, and effective transportation systems. Note, the requested PMA does not approve development on the site. Future development would require additional land use approvals. At that time, a Traffic Impact Analysis would be required (if the threshold is met) which would trigger an analysis of site impacts on the surrounding transportation system.

The proposed amendment is consistent with the goal.

Goal 9 – Public Facilities and Services

Goal 9.1 Water Plan, construct, and maintain a City water system that protects the public health, provides cost-effective water service, meets the demands of users, addresses regulatory requirements and supports all land uses.

Response: To achieve Goal 9.1, Policy 9.1.1 requires developers to aid in improving the water system by constructing facilities to serve new development and extend lines to adjacent properties.

The Tualatin Height Apartments are within the City of Tualatin Service Area B. The existing 222 multi-family units on the property are currently served by an existing, looped, 8-inch public main running through the site with two connections to a 12-inch public main in SW Sagert Street. The proposed PMA would provide the potential for an additional 116 multi-family units on the property. If the full 116 new units were constructed, the applicant's engineer has determined that the existing water infrastructure would be generally adequate to support future development and lines have already been constructed along the site frontage to adjacent properties. Detailed water modeling will be completed at the time of redevelopment to confirm the adequacy of the existing system.

The proposed amendment is consistent with Goal 9.1 and the corresponding policies of the Tualatin Comprehensive Plan.

Goal 9.2 Plan, construct, and maintain a City sewer system that protects the public health, protects the water quality of creeks, ponds, wetlands and the Tualatin River, provides cost-effective sewer service, meets the demands of users, addresses regulatory requirements and supports all land uses.

Response: To achieve Goal 9.2, Policy 9.2.4 requires developers to aid in improving the sewer system by constructing facilities to serve new development, as well as adjacent properties.

The 222 multi-family units at the Tualatin Heights Apartments are served by an existing, 8-inch public sewer main that runs in an easement along the north side of the site. The proposed PMA would provide the potential for an additional 116 multi-family units on the property. If the full 116 new units were constructed, the applicant's engineer has determined that the existing infrastructure would be generally adequate to support future development and adjacent parcels already have access to public sewer. Detailed sewer modeling will be completed at the time of redevelopment to confirm the adequacy of the existing system.

The proposed amendment is consistent with Goal 9.2 and the corresponding policies of the Tualatin Comprehensive Plan.

Goal 9.3 Provide a plan for routing surface drainage through the City, utilizing the natural drainages where possible. Update the plan as needed with drainage studies of problem areas and to respond to changes in the drainage pattern caused by urban development.

Response: To achieve Goal 9.3, Policy 9.3.7 requires the enforcement of drainage and stormwater management standards.

Stormwater runoff from the Tualatin Heights Apartments is currently collected and routed to an onsite stormwater management facility before discharging to an existing surface conveyance at the northeast corner of the site. The details and design parameters for the

existing facility are unknown. Redevelopment will trigger stormwater management improvements as required by Clean Water Services' Design and Construction Standards. A detailed storm report will be completed at the time of redevelopment to identify facilities that will address water quality, flow control and hydromodification requirements.

The proposed amendment is consistent with Goal 9.3 and the corresponding policies of the Tualatin Comprehensive Plan.

Section 4: Compliance with the Tualatin Development Code

This section responds to the applicable policies and goals of the Tualatin Development Code.

Ch. 33.070 Plan Amendments

(2)Applicability. Quasi-judicial amendments may be initiated by the City Council, the City staff, or by a property owner or person authorized in writing by the property owner. Legislative amendments may only be initiated by the City Council.

Response: The property owner is the applicant and has requested a Plan Map Amendment, a quasi-judicial amendment.

(3)Procedure Type.(a)Map or text amendment applications which are quasi-judicial in nature (e.g., for a specific property or a limited number of properties) is subject to Type IV-A Review in accordance with TDC Chapter 32.(b)Map or text amendment applications which are legislative in nature are subject to Type IV-B Review in accordance with TDC Chapter 32.

Response: The applicant understands the Plan Map amendment application is subject to a Type IV-A Review procedure.

(4)Specific Submittal Requirements. An application for a plan map or text amendment must comply with the general submittal requirements in TDC 32.140 (Application Submittal).

Response: This application package includes all applicable requirements for the application as described in TDC 32.140, they include, but are not limited to:

- Proof of Ownership (Exhibit F),
- Neighborhood Meeting Summary (Exhibit B),
- Application fees, and
- Application form.

(5) Approval Criteria.

(a) Granting the amendment is in the public interest.

Response: Amending the plan designation from RML to RMH will increase the permitted density on the site to allow for a maximum of 116 more units at the

Tualatin Heights Apartments site. The site currently contributes to diverse housing options in Tualatin, providing rental opportunities for apartments. The proposed PMA will enhance housing choices in the community and provide an affordable housing opportunity for existing and future residents. Housing is an important need in the Tualatin community, as supported by Tualatin Comprehensive Plan policies and goals (see Section 3 of this narrative). Providing additional housing opportunities and expanding housing choices within the City will support the public interest.

The requested Plan Map Amendment would increase the maximum permitted density on the site. With the increased density allowance, the applicant would like to redevelop portions of the complex internal to the site to create additional dwelling units. Findings of the Tualatin Housing Needs Analysis (HNA), completed in 2019, supports the need for additional multi-family housing in the City consistent with this proposed amendment request. The report demonstrates a need for multi-family dwelling units and medium- to high-density plan designations. As shown in Table 2 (taken from the City's HNA), Tualatin has a surplus of dwelling unit capacity in the RML designation, with surplus capacity for approximately 315 units and 27 gross acres of land to accommodate growth. Meanwhile there is a deficit of land for dwelling units in the RMH designation, a deficit of 109 dwelling units or 7 gross acres of land. In addition to the deficit, there is also a demand for 122 units in the RMH district (Source: See Table 2). The proposed amendment would provide potential capacity for an additional 116 dwelling units on the existing site and reduce the documented deficit within the RMH district.

The PMA will also provide the opportunity to further diverse housing options in Tualatin, through a more efficient use of an existing site that is already a committed multi-family development. Also, additional density typically supports transit service and alternative transportation options such as walking and biking. Public facilities to serve the additional dwelling units are already in-place and have sufficient capacity to accommodate the new units.

The criterion is met.

(b) The public interest is best protected by granting the amendment at this time.

Response: As demonstrated above, it is in the public interest to provide additional multi-family housing in Tualatin. In Chapter 4 of the HNA, trends affecting housing in Tualatin are discussed. Various trends remain pertinent and contribute to significant issues in the Tualatin and Oregon community: rent-burdened households and houselessness. According to the HNA, housing costs affect Oregon's low-wage workers the most, and low-wage employment is a growing share of the Oregon economy. Thus, the HNA states, "*Tualatin has a large share of multi-family housing (about 41% of the City's housing stock), but over half of renter households are cost burdened. Tualatin's key challenge over*

the next 20 years is providing opportunities for development of relatively affordable housing of all types, such as lower-cost single-family housing, townhouses and duplexes, market-rate multi-family housing, and government-subsidized affordable housing.”

The need for more housing has been and will continue to be an issue at the forefront of Oregon’s policy issues for years to come. The proposed PMA will provide the opportunity to redevelop portions of the existing Tualatin Heights apartment complex and provide increased housing opportunities and density. This proposed action will protect and enhance the public’s interest.

The criterion is met.

(c) The proposed amendment is in conformity with the applicable goals and policies of the Tualatin Comprehensive Plan.

Response: Conformance with applicable Tualatin Comprehensive Plan goals and policies are addressed in Section 3 of this narrative.

(d) The following factors were consciously considered:

(i) The various characteristics of the areas in the City;

Response: The neighborhood characteristics were considered in the proposal. The existing multi-family development site is located at the edge of a low- to medium-density residential neighborhood and abuts a light industrial zone to the north. The site’s current and proposed use and design are an ideal transition between the two zones.

With the increased density permitted on the site, the applicant intends to redevelop internal areas of the site to provide additional units. Changes internal to the site are expected to have minimal impacts on neighboring sites and will comply with applicable Tualatin Development Code standards, as determined through a future Architectural Review application following the PMA request.

At the Neighborhood/Developer Meeting neighbors expressed concerns about traffic and parking conditions in the site’s vicinity. In response, the applicant analyzed on-site and on-street parking abutting the site (see Parking Assessment, Exhibit C).

The criterion is met.

(ii) The suitability of the areas for particular land uses and improvements in the areas;

Response: The site is currently the location of the Tualatin Heights Apartments. There are 220 existing multi-family dwellings on the 22.4 acre site. The PMA would result in the redevelopment of a portion of the existing site with up to 116 additional multi-family dwelling units. The area is located near schools and employment opportunities. Tualatin Elementary school is within walking distance of the site, approximately ¼ mile away down SW 95th Ave . Tualatin High School is located just over a mile away.

There are a number of commercial and industrial businesses located along SW Tualatin-Sherwood Road, and SW Teton Ave, including the commercial hub located next to Interstate-5 located just over a mile from the site.

Multi-family development is often encouraged near transit. Within quarter-mile of the Tualatin Heights site there are nine (9) bus stops. Additionally, the Tualatin WES station is located approximately 0.8 miles walking distance from the site (see Figure 2).

The PMA will provide the opportunity to more efficiently use an existing site that is already committed to multi-family residential use. Public facilities to serve the additional dwelling units are already in-place and have sufficient capacity to accommodate the new units. The site and area are well-suited to support the proposed PMA.

The criterion is met.

(iii) Trends in land improvement and development;

Response: Recent land improvement and development trends have emphasized the need for a diversity in housing options. This finding is supported by the City's HNA prepared in 2019. The need to more efficiently use existing properties within the UGB is also a trend that is addressing housing costs and choice. The PMA will provide the opportunity to more efficiently use an existing site that is already committed to multi-family residential use. Public facilities to serve the additional dwelling units are already in-place and have sufficient capacity to accommodate the new units.

As noted in previous responses the proposed amendment is consistent with the trend of providing more multi-family housing to provide more housing choice and typically more affordable options to individuals and families.

The criterion is met.

(iv) Property values;

Response: The site is currently committed to multi-family development. Property values in the area already recognize the use as multi-family and

have accounted for any impact on value. The proposed PMA would continue this multi-family use on the site and would not alter property values.

The criterion is met.

(v) The needs of economic enterprises and the future development of the area; needed right-of-way and access for and to particular sites in the area;

Response: There is existing right-of-way and access to the site that does not obstruct or conflict with any surrounding sites. North of the site is a railroad right-of-way, which creates a buffering north and eliminates the potential for any access from the north of the property.

The criterion is met.

(vi) Natural resources of the City and the protection and conservation of said resources;

Response: There are no protected natural resources located on the site. The PMA would increase the permitted density on the site, allowing a more efficient use of land in the existing development. More efficient use of land located within the UGB and urban area of Tualatin could reduce pressure to expand the UGB.

The criterion is met.

(vii) Prospective requirements for the development of natural resources in the City;

Response: There are no protected natural resources located on the site.

The criterion is not applicable.

(viii) The public need for healthful, safe, esthetic surroundings and conditions; and

Response: The Tualatin Heights Apartments currently provides safe and healthy living conditions to its residents. The site includes amenities such as a pool and common rooms, and they will continue to exist and operate on the site.

The site provides buffering to the surrounding neighborhood via landscaping. Any future development will be reviewed for consistency with the TDC standards, including buffering and landscaping.

The Parking Assessment (Exhibit C) evaluated the current parking conditions at the Tualatin Heights Complex and on-street parking on the neighboring streets of SW Sager Street, SW 93rd Avenue, and SW Apache Drive. The

evaluation determined there are 457 spaces existing on the site: 417 surface parking spaces on the site and 40 covered spaces (either in carports or garages). With the existing 457 parking spaces there was a maximum utilization of 79%. The assessment accounted for buffers from fire hydrants and mailboxes. Concerns about access to mailboxes and waste collection were expressed by the neighbors during the Neighborhood/Developer Meeting.

The applicant and property owner/manager, UDR, has a well-organized system for delegating parking spaces to residents. They plan to maintain the structured, well-organized parking system and meet the parking requirements associated with additional units at the time of their construction, pursuant to TDC 73C.

As described above, the HNA demonstrates a clear need for additional multi-family housing in Tualatin. Approval of the requested PMA would permit development of additional multi-family units on the Tualatin Heights site, creating additional housing opportunities for the current and future Tualatin residents.

The criterion is met.

(ix) Proof of change in a neighborhood or area, or a mistake in the Plan Text or Plan Map for the property under consideration are additional relevant factors to consider.

Response: The proposed plan map amendment is not associated with a mistake in the Plan Text or Plan Map, nor is there a change in the neighborhood or area. The PMA will provide the opportunity to more efficiently use an existing site that is already committed to multi-family residential use.

The criterion is not applicable.

(e) If the amendment involves residential uses, then the appropriate school district or districts must be able to reasonably accommodate additional residential capacity by means determined by any affected school district.

Response: As demonstrated in Exhibit E, the additional dwelling units that would result from the proposed PMA can be reasonably accommodated by the Tigard/Tualatin School District schools that serve the Tualatin Heights apartments. The criterion is met.

(f) Granting the amendment is consistent with the applicable State of Oregon Planning Goals and applicable Oregon Administrative Rules, including compliance with the Transportation Planning Rule TPR (OAR 660-012-0060).

Response: The applicant conducted a traffic assessment to determine future transportation conditions under the current zoning and under the proposed zoning. The following is the summary of the findings of that assessment. The full traffic assessment is presented in Exhibit D.

Existing Transportation Conditions

- Traffic counts were collected in June 2021 at all of the study intersections during the critical weekday AM and PM peak travel periods. Historical 2019 counts were supplemented at several key intersections in order to account for travel demand reductions associated with on-going COVID-related factors.
- Operational analyses indicate that all of the study intersections currently operate acceptably based on the applicable City of Tualatin and Washington county standards.

Future Year 2040 Traffic Conditions

- The proposed land use action is a unique case that would involve upzoning the Tualatin Heights apartment complex property. The complex is approximately 22 acres in size and contains 220-unit multifamily apartment units. The underlying zoning is Residential Medium Low (RML) which currently allows for a maximum density of 10 dwelling units per acre. Accordingly, the Tualatin Heights apartment complex is essentially maximizing the allowed development potential under the existing zoning. In order to support a vision for additional housing units on the site, the property owner is proposing to modify the zoning to Residential Medium-High Density (RMH) which would increase the density to a maximum of 15 dwelling units per acre.
- Background traffic volumes for the 2040 planning horizon year were estimated using a combination of regional travel demand model output and historical growth trends. Since the existing site is built out to its maximum allowed density, the resulting 2040 background traffic volumes represent the future traffic conditions that can be expected under the existing RML zoning.
- Operations of the study intersections under 2040 Background conditions (assuming regional and local traffic growth but no land use action on the Tualatin Heights site) found that all of the study intersections are forecast to continue to operate acceptably during both the weekday AM and PM peak hours with the exception of the SW Boones Ferry Road/SW Sagert Street intersection. During the weekday AM Peak hour, this intersection is forecast to operate over capacity (v/c of 1.09) and at Level of Service F conditions.
- With the proposed RMH zoning, it was determined that the increased density allowance can potentially result in 116 additional

multifamily housing units. Using ITE land use code 221, this increased density has the potential to generate approximately 630 net new daily trips, 42 net new AM peak hour trips, and 51 net new PM peak hour trips.

- Operations of the study intersections under the 2040 proposed RMH zoning scenario found that all of the study intersections are forecast to operate acceptably during both the weekday AM and PM peak hours with the continued exception of the SW Boones Ferry Road/SW Sagert Street intersection. During the weekday AM Peak hour, this intersection is forecast to also operate over capacity (v/c of 1.10) and at Level of Service F conditions. While a very small degradation in operations compared to existing zoning, this technically represents an impact to the operations of the intersection. To address TPR requirements, the identification of a long-term mitigation plan would be needed to restore capacity to the intersection and show it can meet operating standards.
 - Although not formally included in the City of Tualatin's latest Transportation System Plan project list, the future year analysis behind the study did identify the potential for a northbound right-turn lane at the intersection. Such an improvement would restore capacity to the intersection and result in acceptable operations under both the 2040 no land use action and with the 2040 proposed RMH rezone.

As demonstrated in Exhibit D, the proposed amendment is consistent with the TPR. The criterion is met.

(g) Granting the amendment is consistent with the Metropolitan Service District's Urban Growth Management Functional Plan.

Response: The following Functional Plan sections are applicable to the proposed amendment.

Title 1 – Housing Capacity requires a city or county maintain or increase its housing capacity.

The findings of the 2019 HNA demonstrate a need for housing, particularly multi-family housing in Tualatin. It also demonstrates a deficit and demand for medium-to high-density residential plan designations, which includes the proposed plan designation. The proposed amendment will facilitate development of additional multi-family units.

The requested Plan Map Amendment would increase the maximum permitted density on the site. With the increased density allowance, the applicant would like to redevelop portions of the complex internal to the site to create additional dwelling units. Findings of the Tualatin Housing Needs

Analysis (HNA), completed in 2019, supports the need for additional multi-family housing in the City consistent with this proposed amendment request. The report demonstrates a need for multi-family dwelling units and medium-to high-density plan designations. As shown in Table 2 (taken from the City's HNA), Tualatin has a surplus of dwelling unit capacity in the RML designation, with surplus capacity for approximately 315 units and 27 gross acres of land to accommodate growth. Meanwhile there is a deficit of land for dwelling units in the RMH designation, a deficit of 109 dwelling units or 7 gross acres of land. In addition to the deficit, there is also a demand for 122 units in the RMH district (Source: See Table 2). The proposed amendment would provide potential capacity for an additional 116 dwelling units on the existing site and reduce the documented deficit of the RMH district.

The PMA will also provide the opportunity to more efficiently use an existing site that is already committed to multi-family residential use. Public facilities to serve the additional dwelling units are already in-place and have sufficient capacity to accommodate the new units.

The standard is met.

Title 7 – Housing Choice implements policies regarding establishment of voluntary affordable housing production goals to be adopted by local governments.

3.07.730 Requirements for Comprehensive Plan and Implementing Ordinance Changes Cities and counties within the Metro region shall ensure that their comprehensive plans and implementing ordinances:

(a) Include strategies to ensure a diverse range of housing types within their jurisdictional boundaries.

(b) Include in their plans actions and implementation measures designed to maintain the existing supply of affordable housing as well as increase the opportunities for new dispersed affordable housing within their boundaries.

(c) Include plan policies, actions, and implementation measures aimed at increasing opportunities for households of all income levels to live within their individual jurisdictions in affordable housing.

The proposed amendment will allow an increase of diversity of housing in Tualatin by allowing development of additional multi-family units. Although, Tualatin Heights Apartments are not government regulated affordable housing, multi-family development is typically a more affordable housing option when compared to detached single family home.

Recent land improvement and development trends have emphasized the need for a diversity in housing options and choice. This finding is supported by the City's HNA prepared in 2019. The need to more efficiently use existing

properties within the UGB is also a trend that is addressing housing costs and choice. The PMA will provide the opportunity to more efficiently use an existing site that is already committed to multi-family residential use. Public facilities to serve the additional dwelling units are already in-place and have sufficient capacity to accommodate the new units.

As noted in previous responses the proposed amendment is consistent with the trend of providing more multi-family housing to provide more housing choice and typically more affordable options to individuals and families.

The standard is met.

Title 12 – Protection of Residential Neighborhoods protects existing residential neighborhoods from pollution, noise, crime, and provides adequate levels of public services.

3.07.1220 Residential Density Metro shall not require any city or county to authorize an increase in the residential density of a single-family neighborhood in an area mapped solely as Neighborhood.

The proposed development is located adjacent to low- to medium-density neighborhoods. It is also abutting the Light Industrial zone. The site provides a transition compatible with all surrounding uses.

The City is not required to authorize an increase of density through the requested PMA. However, this application demonstrates that the proposed amendment is a public interest to provide multi-family housing in the community where a deficit and need has been identified.

The standard is met.

(i) Granting the amendment is consistent with the objectives and policies regarding potable water, sanitary sewer, and surface water management pursuant to applicable goals and policies in the Tualatin Comprehensive Plan, water management issues are adequately addressed during development or redevelopment anticipated to follow the granting of a plan amendment.

Response:

WATER

Goal 9.1 of the Tualatin Comprehensive Plan is to “Plan, construct and maintain a City water system that protects the public health, provides cost-effective water service, meets the demands of users, addresses regulatory requirements and supports all land uses.”

To achieve Goal 9.1, Policy 9.1.1 requires developers to aid in improving the water system by constructing facilities to serve new development and extend lines to adjacent properties.

The Tualatin Height Apartments are within the City of Tualatin Service Area B. The existing 222 multi-family units on the property are currently served by an existing, looped, 8-inch public main running through the site with two connections to a 12-inch public main in SW Sagert Street. The proposed PMA would provide the potential for an additional 116 multi-family units on the property. If the full 116 new units were constructed, the applicant's engineer has determined that the existing water infrastructure would be generally adequate to support future development and lines have already been constructed along the site frontage to adjacent properties. Detailed water modeling will be completed at the time of redevelopment to confirm the adequacy of the existing system.

The proposed amendment is consistent with Goal 9.1 and the corresponding polices of the Tualatin Comprehensive Plan.

SANITARY SEWER

Goal 9.2 of the Tualatin Comprehensive Plan is to *“Plan, construct and maintain a City sewer system that protects the public health, protects the water quality of creeks, ponds, wetlands and the Tualatin River, provides cost-effective sewer service, meets the demands of uses, addresses regulatory requirements and supports all land uses.”* To achieve Goal 9.2, Policy 9.2.4 requires developers to aid in improving the sewer system by constructing facilities to serve new development, as well as adjacent properties.

The 222 multi-family units at the Tualatin Heights Apartments are served by an existing, 8-inch public sewer main that runs in an easement along the north side of the site. The proposed PMA would provide the potential for an additional 116 multi-family units on the property. If the full 116 new units were constructed, the applicant's engineer has determined that the existing infrastructure would be generally adequate to support future development and adjacent parcels already have access to public sewer. Detailed sewer modeling will be completed at the time of redevelopment to confirm the adequacy of the existing system.

The proposed amendment is consistent with Goal 9.2 and the corresponding policies of the Tualatin Comprehensive Plan.

STORM DRAINAGE

Goal 9.3 of the Tualatin Comprehensive Plan is to “Provide a plan for routing surface drainage through the City, utilizing the natural drainages where possible. Update the plan as needed with drainage studies of problem area and to respond to changes in the drainage pattern caused by urban development.” To achieve Goal 9.3, Policy 9.3.7 requires the enforcement of drainage and stormwater management standards.

Stormwater runoff from the Tualatin Heights Apartments is currently collected and routed to an onsite stormwater management facility before discharging to an existing surface conveyance at the northeast corner of the site. The details and design parameters for the existing facility are unknown. Redevelopment will trigger stormwater management improvements as required by Clean Water Services’ Design and Construction Standards. A detailed storm report will be completed at the time of redevelopment to identify facilities that will address water quality, flow control and hydromodification requirements.

The proposed amendment is consistent with Goal 9.3 and the corresponding policies of the Tualatin Comprehensive Plan.

The criterion is met.

(j) The applicant has entered into a development agreement. This criterion applies only to an amendment specific to property within the Urban Planning Area (UPA), also known as the Planning Area Boundary (PAB), as defined in both the Urban Growth Management Agreement (UGMA) with Clackamas County and the Urban Planning Area Agreement (UPAA) with Washington County.

Response: The subject property is not located in the UPA.

The criterion is not applicable.

Section 5: Conclusion

In summary, the proposal complies with the applicable approval criteria. The applicant requests that the City approve the Plan Map Amendment to amend the subject site’s Plan Map designation to Medium High Density Residential (RMH).