

City Of Woodland
Planning Commission Meeting Agenda Summary Sheet

Agenda Item: <u>Staff Report for Comp Plan Map Amendment application CPA-18-010</u>	Agenda Item #: <u>(V) Public Hearing</u>
	For Agenda of: <u>December 20, 2018</u>
	Department: <u>Community Development</u>
	Date Submitted: <u>December 17, 2018</u>

Cost of Item: 0
Amount Budgeted: _____
Unexpended Balance: _____

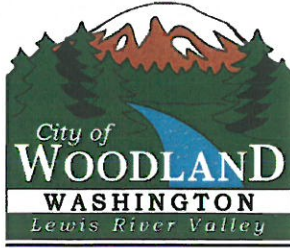
BARS #: Description:

Department Supervisor Approval: Travis Goddard, Community Development Director

Committee Recommendation: N/A

Agenda Item Supporting Narrative (list attachments, supporting documents): Attachment: Staff report All other documents can be found at: http://www.ci.woodland.wa.us/departments/planning/comprehensive.php
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Summary Statement/Department Recommendation: Staff has prepared a staff report with a recommendation to adopt Growth Scenario #6.



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STAFF REPORT & RECOMMENDATION City of Woodland Comprehensive Plan Map Amendment

ISSUE DATE: December 17, 2018

Land Use Application No.: CPA2018-010/SEP2018-008

Applicant:	City of Woodland PO Box 9 230 Davidson Avenue Woodland, WA 98674
Notice of Application & Likely DNS Issued:	November 29, 2018
Published:	December 5, 2018
Comment Due Date:	December 19, 2018 (SEPA) December 20, 2018 (Binding Site Plan hearing)

I. DESCRIPTION OF PROPOSAL:

The City of Woodland is reviewing changes to its Comprehensive Plan map. (aka the "comp plan" and "the map")

Applicant map change requests have been received from property owners who are both within the current city limits and from those who wish to have the City extend its Urban Growth Area (UGA) to include their property currently located in Cowlitz County.

To avoid a piecemeal review of those requests for comp plan amendments, staff developed a series of growth scenarios for how the City's growth could occur. These growth scenarios are meant to be the lens through which the City should perform its future planning efforts.

The growth scenarios are:

Scenario 1 – No Growth – No expansion of the growth area is needed or desired.

Scenario 2 – Internal Growth – All growth will be accommodated through comp plan designation changes for land already within the City limits. (Modified No-Expansion)

Scenario 3 – Partial Applicant Accommodation – Given the number of applications and the amount of area that is proposed for UGA expansion, the City could

choose to include some of that land within its Urban Growth Boundary (UGB).

Scenario 4 – Full Applicant Accommodation – Plans for the inclusion scenario where all applications are included in the UGB. (But nothing more.)

Scenario 5 – City Proposed Boundary Expansion – The City staff, using its best professional judgment, will look at UGB expansion using logical and practical approaches to eliminate boundary peculiarities. (Assuming full applicant accommodation...but filling in the holes or other obvious inclusions.)

Scenario 6 – Woodland Bottoms Planning – Recognizing that all activity within the bottom lands generates impacts (like traffic) in the City of Woodland, the City will look at the practical implication of growth within the bottomlands. Including planning for growth impacts that occur in Cowlitz County.

These scenarios represent a smallest to largest approach.

Staff also needs to clarify that these scenarios represent an expansion to the City's Urban Growth Area (UGA) boundary and **NOT AN EXPANSION OF THE CITY LIMITS**. The above listed scenarios represent the area that the City will analyze for planning purposes (as opposed to not planning for).

II. LOCATION OF PROPOSED DEVELOPMENT

The area affected by this application can include some or all the area west of Interstate 5 between the Columbia and Lewis Rivers and located within Township 5 North and Range 1 E.W.M. and Range 1 W.W.M. in the area known as the Woodland Bottoms.

III. REVIEW AUTHORITY

Per WMC 19.08.030, applications for a Comprehensive Plan Amendments are processed and a staff report developed by staff. The Planning Commission reviews the staff report and holds an open record pre-decision hearing where the Commission will make a recommendation to be forwarded to the City Council. The City Council is thereafter responsible for making the decision on the Comprehensive Plan Amendments.

As laid out in WMC 17.84.040 the Planning Commission shall issue its recommendation within 90-days from the date of the required public hearing. Notice that the Planning Commission has made a recommendation shall be forwarded to applicants within 14 days of the decision. If the recommendation is for approval of a comp plan amendment, a copy of the decision, staff report, findings, and any special conditions considered by the commission to be controlling and necessary shall be forwarded to the City Council within 14 days of said action.

Per WMC 17.84, amendments to the comprehensive plan text and map are permitted, once initiated, after a public hearing by the Planning Commission. Notice for the public hearing was published in The Reflector on December 5th, 2018 as well as distributed to the Lewis River Review, The Daily News, and The Columbian newspapers. Notice was also posted at the Woodland Post Office, City Hall, and the Police Station and mailed to approximately 1700 property owners of record within the subject area and within 300 feet of the boundaries for site specific applications.

IV. FINDINGS

Background

Finding 1: Cowlitz County Resolution 02-078, outlines how the Cowlitz-Wahkiakum Governmental Conference (CWCOG) and Cowlitz County (and its jurisdictions) developed strategies for growth starting as early as 1977 and culminating in the 2002 adoption of Resolution 02-078. (Recorded as AFN 3147189) This document outlined a process and set of goals/policies for Urban Growth Management (UGM) and how planning would occur.

Within that document, is a statement that the *"objective is not to discourage or limit growth, but rather to direct it in such a way as to minimize the cost in terms of dollars, associated environmental impacts and the preservation of rural lands and open spaces."* (Page 4 of 29)

Further, the document laid out that in addition to *"minimizing public service and facility costs, a number of other benefits can accrue from an urban growth management program:*

- *Effective and efficient use of existing investment and coordinated lands use and capital facility decisions;*
- *An adopted program showing the City's expansion and service area adds certainty to the benefit of local officials, citizens and development interests;*
- *The city gains some control over its own future, gaining a formal voice in what the County approves in the unincorporated portion of the urban area adjacent to City limits;*
- *With urban-level growth directed into the City and its expansion area, the City's tax base and position as a social, economic, and cultural center is enhanced; and*
- *Agricultural and forest lands surrounding the City can be conserved, energy saved, and the City's existing character maintained."*

Finding 2: The City of Woodland has an adopted Growth Management Act (GMA) compliant plan which plans for a 2036 population projection of 9,274 and 3,566 housing units. (The comp plan amendment was processed in 2015 and the plan was adopted March 22, 2016.)

Finding 3: As outlined in Resolution 02-078 on Page 6 of 29, the City and County performed outreach efforts that resulted in the adoption of an UGM program and updates to the County Comprehensive Plan (2002). Since that time, the City has adopted updates to its comp plan including major updates in 2005 and 2016. But in the 2016 update, the City specifically updated the comp plan text but opted not to make changes to the comp plan map. The result of this decision has left the City with projected 2036 population projections to be accommodated within a growth area adopted in 2005 when the City's population was 4,460 and projected to be 6,442 by 2015 (using a 4.5% population growth rate).

Finding 4: The 2016 comp plan land use assumptions are outlined in Table 3-1 shown below.

Table 3-1. Woodland Planning Assumptions and Targets

Planning Assumptions and Targets	2016
2015 Population	5,708
20-Year Population Projection	9,274
Planned Population Growth (new)	3,566
Assumed Annual Population Growth Rate	2.3%
Existing Housing Units	1,933
Person per Household (p/hh)	2.77
Undeveloped residential land	174 acres
Projected Low Density new Housing Starts (4 units/acre)	673
Projected High Density Housing Starts (20 units/acre)	619
Projected Total Housing Units in 2036	3,225
Housing Type Ratio	60% low density, 40% high density
2013 jobs estimate	3,300
Undeveloped Commercial zoned land	124 acres
Projected New Commercial Jobs (20/acre)	2,480
Undeveloped Industrial zoned land	548 acres
Projected New Industrial Jobs (4/acre)	2,192
Current Jobs/Household	1.7:1
Projected Jobs/Household	1.4:1
Infrastructure and Critical Area Deductions	28%

This table shows that the City projected a 2.3% growth rate adding 3,566 people to the City by using the 174 acres of undeveloped residential land within the City limits and the UGA.

The plan likewise predicts that the adopted land supply for commercial and industrial users is adequate to accommodate 2,480 commercial jobs on the 124 acres of commercial zoned land, and 2,192 industrial jobs on the 548 acres of industrial zoned land within the city and UGA.

Finding 5: Since 2015, the City has grown at a rate that exceeds the 2.3% projected by the plan.

Using the 2015 population of 5,708 used in the plan, the 2018 population would be projected to be 6,111. However, the current Washington State Office of Financial Management projection for 2018 is 6,205. An annual growth rate of about 2.8% per year not 2.3%. The difference, 94 citizens is +1.4% difference over the first three years of the 20-year comp plan.

Finding 6: Since 2015, the amount of developable residential land consumed since the 2015 plan update has also exceeded expectations. Staff performed a cursory review of developable residential land within the City and UGA and found that of the 174 acres of land identified as available in 2016, only approximately 49 acres are available for development.

This means that since adoption of the plan, only approximately 38% of the available developable residential land remains available for development to accommodate the remaining 90+% of the projected population.

Finding 7: Using the projected densities outlined in Table 3-1 of the comp plan, the amount of developable multi-family is 120 units (6 acres x 20 units per acre) while developable single-family residential land can accommodate 176 units (44 acres x 4 units per acre). That represents 296 units, or less than 10% of the projected 3,566 units projected by the comp plan.

So not only is our population growing at an accelerated rate since the plan was adopted, but the supply of developable residential land is constrained and in very short supply.

Finding 8: Given the findings above, staff used the recent trend in building permit applications (approximately 50 units per year) to project how long the land supply would last without changes to the City's map or the UGA boundary. The result was that the City could accommodate growth until approximately 2025/26 before the residential land supply is consumed.

POPULATION	2015	2018	2019	2020	2021	2022	2023	2024	2025	2026
HOUSING										
SCENARIO I										
Existing Housing Units	1,933	2326	2398	2448	2572	2696	2746	2796	2846	2854
SFR		1447	36	50	50	50	50	50	50	8
Duplex		116	8							
3&4 Units		113	28							
5+ units		366			74	74				
Mfg Homes		263								
Special housing		21								

This chart also assumes that at some point the property zoned Medium Density Residential on Green Mountain Road will develop.

Finding 9: The adopted plan has established that the City will continue to grow to a population of over 9,000 people and add more than 4,500 jobs. While there was adequate land for industrial and commercial growth within the current city limits, analysis of current residential development trends indicates that there will not be adequate residential land available to accommodate that growth.

Comp Plan Map Amendment Applications Pending

Finding 10: Having reached the conclusions above, the City must further recognize that there are several applicants who have submitted formal application requests for amendments to the City’s comp plan map. These applications present a problem because staff is obligated to review the requests considering a comp plan that assumes growth but using a map that fundamentally may not allow for the achievement of the goals and policies espoused by the plan.

Comp Plan Map Growth Scenarios

Finding 11: In response to this pressure, staff generated the six (6) growth scenarios for how to consider the needs of the City in a long-range, forward-looking manner to frame the analysis for the review of subsequent individual project requests.

Finding 12: Having developed a broad range of scenarios, staff embarked on an outreach effort to engage the citizens of Woodland and the surrounding area affected by these potential map amendments. Staff conducted more than a dozen community presentations and held five open houses between the months of September and December. Contact was made with more than 160 individuals, not including those who may have viewed the material either on the City’s website or by watching recordings of the presentations available on-line. In addition, more than 1,700 written notices were distributed in relation to the public hearings for considering this case and those of the applicant requests.

Finding 13: Each scenario, numbered One (1) through Six (6) in an ascending order from smallest in size to largest, was presented with some development assumptions. The maps for each scenario are included in the attachment identified as Document 7. The development assumptions are included in the attachment identified as Document 10 with the accompanying charts in Document 11.

The assumptions included a factor for how much of an individual property in question critical area constraints would have (between 10 and 40% based on cursory review of available maps) and set-asides for infrastructure (roads, sidewalks etc.). Additionally, staff used the density calculation of 4 units per acre for single-family residential development and 20 units per acre for multi-family (per Table 3-1 from the comp plan).

And generally, staff assumptions were limited to either single-family units or multi-family units (5+ units). A sample of these assumptions for Scenario 3 looks like:

POPULATION	2015	2018	2019	2020	2021	2022	2023
HOUSING	SCENARIO 3						
Existing Housing Units	1,933	2326	2423	2535	2630	2780	2930
SFR		1447	36	50	50	50	50
Duplex		116	8				
3&4 Units		113	35				
5+ units		366	18	62	45	100	100
Mfg Homes		263					
Special housing		21					

What it shows is that staff predicted 36 single-family residential (SFR) units, 8 duplex units, 35 triplex/fourplex units, and 18 multi-family units (5+ units) by end of 2019.

*Staff also points out that between the adoption of the comp plan in 2015 and this update, the number of residential units jumped from 1,933 to 2,326. Those numbers reflect a 3-year difference of 393 housing units. Staff cannot prove or disprove the 2015 number because it cannot reproduce that number. However, staff searched the permit records at the City and determined that on average the City issued building permits for approximately 50 units in each of those years. Therefore, the 393 unit count either includes a disproportionately large number of units that were started in 2014 but not completed prior to the 2015 population projections, or, that the 2015 number is actually a 2014 number and that the number represents a 4-year growth rate; or, that the city is actually averaging almost 100 units per year and staff missed a significant number of building permits issued; or, that the 2015 number is based on a significantly underestimate of the number of housing units (and population?) in the comp plan calculations? Either way, staff used the 2015 numbers from the comp plan as a base but also used the most recent population and housing information available from the Washington State Office of Financial Management.

Finding 14: In addition to those assumptions, each scenario includes a calculation for population that includes not only the City comp plan’s 2.3% growth (6,494) but also a population projection that uses the City staff’s best professional judgement using permit data (6,517).

POPULATION	2015	2018	2019	2020	2021	2022
20-year Population Projection	9,274	9,274				
Planned Population Growth	3,566	3,069				
Population	5,708	6,205	6,348	6494	6643	6796
Assumed Annual Growth Rate	2.3%	2.30%	2.30%	2.30%	2.30%	2.30%
	Using the 15-18 trend	2.67%	6,348	6,517	6,691	6,870
			2.67%	2.67%	2.67%	2.67%

Staff included this as an effort to provide a data driven extrapolation of what could account for the discrepancy between the comp plan’s population projection and the actual growth that seems to be occurring at an accelerated rate as discussed above.

Finding 15: Lastly, for each scenario staff included assumptions for how many units could occur on a given property in that scenario. For example, Scenario 2 involves three requests: Woodland Commerce Center; B Young; and Saxony Pacific off Franklin Loop.

Potential Projects

The following are staff’s best estimate for what each of the applications represent in terms of units per project.

Project Name/Applicant	Location	Acres	Units	Type	Year?
Woodland Commerce Center	City	5.52	43	MRF	2019-2020
B Young	City	6.37	89	MFR	2020-2021
Saxony Pacific	City	21.51	264	MFR	2022-2024
		33.4	396		

For this scenario, knowing the acreage for each request, staff performed a quick calculation to accommodate for critical areas and set aside land for infrastructure, to calculate the number of units (43, 89, and 264), the type of units (“SFR” for single-family residential, or

"MFR" for multi-family residential), and then projected the year those units were likely to be constructed.

So, reading the projections in context, staff estimated that the Saxony Pacific project, if approved, could result in 264 multi-family residential units, with construction likely occurring between 2022 and 2024. (100 units, 100 units, 64 units per construction season as shown below.)

The following are staff's best estimate for what each of the applications represent in terms of units per project.

Project Name/Applicant	Location	Acres	Units	Type	Year?
Woodland Commerce Center	City	5.52	43	MRF	2019-2020
B Young	City	6.37	89	MFR	2020-2021
Saxony Pacific	City	21.51	264	MFR	2022-2024
		33.4	396		

POPULATION	2015	2018	2019	2020	2021	2022	2023	2024	2025
HOUSING									
Existing Housing Units	1,933	2326	2423	2535	2630	2780	2930	3044	3094
SFR		1447	36	50	50	50	50	50	50
Duplex		116	8						
3&4 Units		113	35						
5+ units		366	18	62	45	100	100	64	
Mfg Homes		263							
Special housing		21							

17.20%

Finding 16: Accordingly, staff recognizes that while it has attempted to use its best professional judgement to reframe the current data in context of the 2016 comp plan, staff has to recognize that this effort is limited by the fact that with only three years of data, staff is not able to definitively identify whether there has been a significant shift in the population or housing trend since adoption of the comp plan. Staff can only attest to the fact that the amount of available land for residential development is significantly reduced to that projected in the comp plan to last till 2036.

Scenario 1 – No Growth – No expansion of the growth area is needed or desired.

Finding 17: In this growth scenario the City would be able to continue growing until the available residential land supply is consumed.

Finding 18: For the purposes of evaluating this growth scenario, staff has assembled a pros and cons table gathered from staff analysis and public input received during the public participation process. (See Growth Scenario #1 section in Document #20)

Finding 19: In general, comments supporting scenario #1 reflected a desire for the City not to grow. There was also a strong desire for the City to fix its existing problems before growth occurs. In other words, there is strong support for existing city residents to be responsible for funding the improvements necessary to facilitate growth.

Finding 20: Comments also expressed a desire for the no growth scenario because, anecdotally, traffic has been getting worse over time.

Given that traffic issues appear to be worsening at an accelerated rate compared to the City's growth, the only conclusion that staff could reach is that growth external to the city will continue to make our traffic problems worse. Choosing the no growth scenario will not slow or prevent increases to the City's traffic situation.

Finding 21: "Fix it first" was a common theme for no-growth advocates. This kind of "build-it and they will come" opinion is inconsistent with the community's record of defeating funding mechanisms which are intended to address transportation problems (like the Transportation Benefit District (TBD) which has been defeated twice.

If the City is to explore ways to fix its transportation problems, the only other way to proceed would be to find another way to fund system improvements. The idea that "growth is expected to pay for growth" and is a foundational idea behind GMA and GMA tools like impact fees.

Finding 22: Historically, the record also shows that City has been unable to fund maintenance activities with the tax revenue it collects, and current tax lid constraints will only serve to shrink the amount of funds available for road maintenance in the future. This leads staff to the opinion that the City will not be able to fix any of the traffic problems that currently exist. In fact, the current trajectory of the City's finances dictates that services will have to be cut, and system improvements delayed indefinitely.

Staff's Conclusion: Scenario #1 is not a viable option for implementing the 2036 population projection adopted under the comp plan, unless there is major redevelopment of large areas of the City's current single-family residential neighborhoods. Given the housing shortage is driving up housing values, the acquisition of single-family homes for redevelopment into multi-family housing is an unreal expectation. This scenario will not allow the City to meet its planning goals.

Additionally, the City already provides an unsustainable level of services and the adoption of this Scenario #1 will only serve to force the city to cut or eliminate services in the future. Another result would likely be that the City will be forced to repeat its planning efforts until a scenario other than Scenario #1 is selected.

Scenario 2 – Internal Growth – All growth will be accommodated through comp plan designation changes for land already within the City limits. (Modified No-Expansion)

Finding 23: In this growth scenario the City would be able to continue growing but with the assumption that the four (4) internal applications would be considered for changes to the comp plan map to further the City's ability to accomplish the goals and policies outlined in the 2016 comp plan text. Specifically, those requests and the potential implications that staff used in their analysis include:

Commercial/Industrial to Residential

- CPA2018-002 (21.51 acres) Saxony Pacific Franklin Loop

Zoning	Size	Critical Areas (estimate)	Infrastructure (estimate)	Usable Acres	UPA	Units
I-1	2.56	50%	20%	1.02	20	20
C-2	13.26	50%	20%	5.30	20	106
C-2	0.82	50%	20%	0.33	20	7
C-2	4.87	50%	20%	1.95	20	39

Units: 172

In this analysis, staff assumed a critical area and infrastructure set aside that reflects potential development scenarios. The scenario calculations assumed that all critical areas could be mitigated by purchasing credits at a wetland bank, so the calculations assume that up to 264 units could be built on this site (for discussion purposes at the open houses).

Commercial to Residential

- CPA2018-011 (6.37 acres) Bruce Young

Zoning	Size	Critical Areas (estimate)	Infrastructure (estimate)	Usable Acres	UPA	Units
C-2	6.37	0%	30%	4.46	20	89

Units 89

In this analysis, the applicant is assumed to build Cherry Blossom to Atlantic with the rest of the infrastructure to be internal to the development.

- CPA2018-012 (5.52 acres) Woodland Commerce Center

Zoning	Size	Critical Areas (estimate)	Infrastructure (estimate)	Usable Acres	UPA	Units
C-2	5.52	20%	0%	4.42	20	43*-88

In this analysis, the applicant is on the shoreline of the Lewis River and has shown staff a preliminary residential townhome design with 43 waterfront homes. So, although he property could have up to 88 units, staff used the number of 43 units.

Residential to Industrial

- CPA2018-007 (0.5 acres) Trevor Beatty

Zoning	Size	Critical Areas (estimate)	Infrastructure (estimate)	Usable Acres	UPA	Units
I-1	0.5	N/A	N/A	0.50	N/A	N/A

In this analysis, the applicant has a home on the property and requesting Industrial designation, so they can operate their business out of the site. No new residential units will result.

Finding 24: With those application assumptions for the internal requests in mind, staff developed the following model for this growth scenario:

The following are staff's best estimate for what each of the applications represent in terms of units per project.

Project Name/Applicant	Location	Acres	Units	Type	Year?
Woodland Commerce Center	City	5.52	43	MRF	2019-2020
B Young	City	6.37	89	MFR	2020-2021
Saxony Pacific	City	21.51	264	MFR	2022-2024
		33.4	396		

POPULATION	2015	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027
HOUSING			SCENARIO 2								
Existing Housing Units	1,933	2326	2423	2535	2630	2780	2930	3044	3094	3176	3250
SFR		1447	36	50	50	50	50	50	50	8	
Duplex		116	8								
3&4 Units		113	35								
5+ units		366	18	62	45	100	100	64		74	74
Mfg Homes		263									
Special housing		21									

Staff's conclusion from this analysis is that Growth Scenario #2 could allow for single-family residential growth at its current pace, till 2025/2026 while multi-family development would also occur at a pace that would last till 2027. But that assumption assumes that project developers will pull building permits in phases AND that they will build to the maximum of their development potential. Staff already knows for example that one applicant could build 88 units but has designs to build 43 units. So even under scenario 2, the supply of residential land cannot accommodate the 2036 population projection.

Finding 25: For the purposes of evaluating this growth scenario, staff has assembled a pros and cons table gathered from staff analysis and public input received during the public participation process. (See Growth Scenario #1 section in Document #20)

Finding 26: There was a general acceptance to the idea that properties currently within the City limits should be considered for changes to their comp plan designations.

Finding 27: There was also an opposing opinion, though smaller, that any conversion of commercial or industrial property for residential purposes should not be considered because it would impede economic development.

Finding 28: In general, comments supporting Scenario #2 reflected a desire for the City not to grow coupled with the strong desire for the City to fix its existing problems before growth occurs. But, growth opponents also acknowledged that this option allowed for additional development in areas currently served by city services.

Finding 29: Citizen input included a desire for the City (existing city residents) to be responsible for funding system fixes and the improvements necessary to facilitate growth. As with Scenario #1, staff cites past resistance to tax/fee increases as well as funding tools like the TBD as evidence that residents within the City's limits lack the will or financial means to fix existing problems.

Staff's Conclusion: Scenario #2 is not a viable option for implementing the 2036 population projection adopted under the comp plan, citing the same reasoning for Scenario #1 above. Additionally, the approval of 33.4 acres of land to be converted to a Residential comp plan designation will not get the city to its stated population planning goal.

This scenario would however contribute considerably to the city's stated goal of increasing its multi-family/single-family housing mix. For that reason, staff suggests that the internal applications be supported for comp plan changes regardless of which growth scenario is selected.

Scenario 3 – Partial Applicant Accommodation – Given the number of applications and the amount of area that is proposed for UGA expansion, the City could choose to include some of that land within its Urban Growth Boundary (UGB).

Finding 30: In this growth scenario the City would be able to continue growing but with the assumption that only some of the applications for comp plan map amendments would be considered for changes to the comp plan map to further the City's ability to accomplish the goals and policies outlined in the 2016 comp plan text. In addition to the requests within the current city limits discussed above, external requests and the potential implications that staff used in their analysis include:

County Land to be included in the Urban Growth Boundary

- CPA2018-003 (16.22 acres) Saxony Pacific Dike Access site

Zoning	Size	Critical Areas (estimate)	Infrastructure (estimate)	Usable Acres	UPA	Units
AG-38	5.22	10%	20%	3.76	20	75
AG-38	0.85	0%	20%	0.68	20	14
AG-38	5.07	0%	20%	4.06	20	81
AG-38	5.08	10%	20%	3.66	20	73

Units: 243

In this analysis, staff assumed that multi-family development will occur on this site and that critical areas could be avoided without affecting the density of the development.

- CPA2018-008 (56.71 acres) Loomis – Empress Estates site

Zoning	Size	Units
UZ	26.36	0
UZ	1.96	0
UZ	1.96	0
UZ	5.05	0
UZ	5.6	0
UZ	5.17	0
UZ	5.29	0
UZ	5.32	0

In this analysis, staff assumed that residential development will not occur because the applicant is requesting inclusion into the growth area for extending water to the existing County lots that have no water. It also needs to be noted that the applicant asked for a split comp plan designation of Residential on top of the bluff, but Commercial at the bottom of the bluff at the north end of the old Old Pacific Highway right-of-way. Split designation on a lot is not permitted so staff assumed that the desire of the applicant would be to include the entire property in the UGA and that a commercial designation could be pursued later if they choose to do so.

- CPA2018-006 (43.61 acres) Walt's Meat

The property included in this application are designated economic Resource Land – Industrial (ERL-IND) under the current Cowlitz County Comprehensive plan but are unzoned. The current industrial user is served by City water and sewer and is asking for inclusion in the UGA. No residential was predicted for these properties therefore limited analysis was completed. Inclusion of this property under Scenario #3 would be completed under the hearing for the case as necessary.

- CPA2018-005 (16.22 acres) Aho Construction (etal.)

Analysis for the other properties included in the Aho application were given a generic ratio of 168 units per 50 acres except for the likely first project known as the Donald Farm. The Donald Farm is the initial application that prompted the discussion for expanding the urban growth boundary.

For the purposes of discussions during the update process, staff assigned the Donald Farm property a 30% & 20% set-aside for critical areas and infrastructure and a 6 unit per acre density (as allowed in the LDR-6 zoning). In numerical terms it is represented as 154.9 acres -30% -20% X 6 units per acre = 520 potential units. (This formula was applied across all acreage in the Aho application as noted above.)

So, while the Aho application represents approximately 480 acres of property, staff used functional acreage of 270 acres to calculate that the land covered by the Aho application.

AND, there are two other external properties that are being considered for inclusion in the UGA because of stated intent (letters of intent but no actual application for inclusion was submitted) for inclusion in the growth area. They are:

- Thoeny Property (14.98 acres)
- CPA2018-004 (29.46 acres) Tsugawa Properties

However, it needs to be noted that inclusion of these properties under Scenario #3, while denying properties that have submitted applications, may not be legally defensible.

Finding 31: For this scenario, staff calculated the acreage covered by the applications and performed a cursory calculation of how many units each individual project could add to the UGA, staff recognized that with a new land supply available, the growth trend could grow from the usual 50 units per year, to a medium rate of 75 units per year, or even to a higher rate of 150+ units per year. Because of this, the calculations and the charts (Documents 10 & 11 in the record) were modified to model different growth rates.

At the same time, staff also recognizes that the number of permits will be affected by many factors that can increase or decrease the rate of growth once the UGA is expanded. While staff did model those growth rates, staff's ultimate response to this unknown factor is the underlying acknowledgement that the inclusion of property into the growth area does not guarantee that development will occur.

Ultimately, for development to occur, applicant's will need to petition for annexation to the City. As part of that process, City code requires that zone change applications be

accompanied by development applications. Presumably this is to ensure that prior to annexation into the City the City Council can evaluate the costs and benefits for each of the development proposals and by extension, the merit of annexing the property or not.

Finding 32: Several citizens expressed varying levels of concern regarding the City “taking” or “over reaching” to take control of too much property, too quickly. Staff points out that performing GMA level planning for areas within a County’s jurisdiction is a planning exercise and not a formal request or action to tax, regulate or control that property. Staff made a point to express the idea that this effort is to put itself in a knowledgeable position if and when a property owner makes a request like the ones city staff now finds itself considering. In other words, how far in advance and for how much of an area, should the City consider when making planning decisions? No attempt to expand the City limits is contemplated as part of this planning effort. Such efforts would be initiated by property owners.

Finding 33: Scenario #3 calculations have projections for growth rates of 50, 75, and 150-unit rates of growth. The calculations for Scenario 3 cannot be modeled effectively because the scenario assumes that some properties will be included in the UGA while others will not, and, staff did not want to consider each individual application request until it had a mental model for how to analyze those applications. As a result, CPA18-010 is the City’s effort to provide planning guidance for subsequent CPA applications not an effort to predict actual permitting levels.

Finding 34: Scenario #3 leads to significant legal jeopardy for the City because the City’s currently adopted growth plan has an adopted growth projection for 9,274 residents. Electing to expand the UGA boundary by picking some successful applications will inevitably lead to appeals by applicants who find some or all of their requests unsuccessful. The only way to avoid these inevitable appeals would be to approve none or all of the UGA expansion requests. (This could also be said of Scenarios #1 and #2 as well if the City cannot mount a defensible argument for why the UGA boundary should NOT be expanded.)

Finding 35: Public input for Scenario #3 was generally unresponsive.

No-growth advocate comments ranged from “risky” to statements that the land was purchased knowing what the zoned and that the City shouldn’t be encouraging a land rush grab in order to make profits for property owners; and that expansion of the City will affect the quality of life for rural residents.

Other comments generally recognized that trying to select some properties for inclusion in the growth area was not worth the legal risk or unlikely to result in a better planning outcome that could be achieved by one of the other scenarios.

Staff’s Conclusion: Scenario #3 is not a viable option for implementing the 2036 population projection without incurring significant consulting and legal expenses to defend the City’s decisions. Staff does not have sufficient resources to perform the scope and type of analysis that would justify selecting Option #3.

Should the Commission and Council want to pursue Option #3, staff recommends that one of the previous options be selected so that staff can revisit this option in three to five years.

By that time, significant amounts of the City's current available land will have been consumed (at current rates) which means staff will have a diminished workload that will allow it to dedicate the time and effort necessary to pursue analysis of Option #3 again.

Scenario 4 – Full Applicant Accommodation – Plans for the inclusion scenario where all applications are included in the UGB. (But nothing more.)

Finding 36: For planning purposes, this option allows for the City to expand the UGB without requiring the significant additional analysis required for Scenario #3 at this time.

Including all the applicant properties gives the City a foundational decision with which it can make all future planning decisions. Specifically, the mix of requests: internal; external; industrial; commercial; residential; to the South; West, and North means that the City staff will have the geospatial information it needs to do utility and transportation planning. (I.E. where development occurs affects the water and sewer infrastructure it effects...do we need upgrades to existing utilities or do we need to plan for new infrastructure?)

Finding 37: For planning purposes, citizen comments reflected the concern that the City is looking at too large of an area for its growth boundary. (Scenarios #4 through #6) Staff admits that depending on the selected growth area size and the rate of growth that will result, the potential UGA expansion in Cowlitz County could represent a planning horizon of more than 20 years.

Finding 38: Under GMA, the City is obligated to provide an adequate land supply to accommodate its growth projection. In the case of Woodland, the area of land subject to GMA is within the inside curve of Horseshoe Lake (in Clark County). This area, under the last several updates of the Clark County plan, has a growth allotment of zero (0) which is problematic because it is designated for residential growth. (Side question...why would Clark County give Woodland an urban growth area but not a growth allotment? By definition, if there will be no growth, there would be no need for a UGA.)

By extension, having zero growth GMA growth area and limiting map amendments in Cowlitz County is also problematic because it applies a GMA fully-planning standard within a partially-planning jurisdiction. Incidentally, the fact that the City adopted its 2016 comp plan update with its growth projections, would have likewise been problematic if an argument were to be made that the proposed map amendments need to meet fully-planning standards. The fact that the 2016 comp plan update adoption succeeded without appeal though the County, the Growth Management Hearings Board, or the Courts, leads staff believe that implementing a geospatial planning analysis effort is needed, even if it might exceed traditional UGA sizing methods. Also, it must be recognized that Woodland is unique in being a bi-county jurisdiction having a GMA compliant (2016) plan while having all of its growth planned for land outside of its GMA footprint. This leads to a fundamental question as to whether drawing a growth area boundary in a partially-planning GMA jurisdiction would be subject to the same standards that a fully-planning county jurisdiction might have to apply (since the City already has a GMA compliant plan). (Staff also notes that Clark County's most recent plan is under appeal and has not been determined to be GMA compliant.)

Staff's Conclusion: Scenario #4 is a viable option for implementing the 2036 population projection. Initial analysis shows that there would be more than enough land to accommodate the population adopted under the comp plan and implement the goals and policies of the plan. Adoption of this scenario would allow for a more informed utility and infrastructure planning process and will likely allow for decision making that will serve the city for more than the 20-year planning window of the comp plan.

However, staff does not recommend this scenario because it includes skipping over considerable acreage of property that will be affected by, and benefit from, the City's planning and service provision decisions. Planning for leaving holes within the growth area boundary is short sighted. The lack of planning by the City has already led to inefficiency in the provision of services, a lack of planning for utilities, and significant increases in services (both for cost and volume) that the City has been unprepared for. Perpetuating a partial vision for planning purposes makes little sense.

Scenario 5 – City Proposed Boundary Expansion – The City, using its best professional judgment, will look at UGB expansion using logical and practical approaches to eliminate boundary peculiarities. (Assuming full applicant accommodation...but filling in the holes or other obvious inclusions.)

Finding 39: This scenario was added in response to Scenario #4 and the number of holes that would occur if the option was adopted by the City. As with #4, this option will allow for planning and preparation for all the properties that submitted applications PLUS some of those properties that will be directly affected by utilities and infrastructure that would serve the area.

Finding 40: This scenario uses staff's best professional judgment to predict the most efficient service boundary decisions. For example, at the south end of the City, water and sewer line extensions were stubbed to the south boundary of the City in both Raspberry and Star Flower Streets. Extending those lines to the Donald Farm site without considering service extension to the south or prohibiting the potential connection of properties between the Donald Farm and the current city limits, is the exact kind of short-sighted planning decision that staff is trying to not perpetuate.

Finding 41: This scenario could add approximately 20% more area to the growth boundary compared to Scenario #4. Property owners within this area would not be affected by additional taxes or regulation, nor will they be obligated to participate in any development related costs at the time neighboring development occurs. They may however be subject to late-comers agreements which would require them to reimburse their share of infrastructure costs if they develop their property using those improvements within 10-years of the improvements. In other words, if these land owners do not develop, or out wait the legal limitations for late-comers agreements, they may not have to pay for the improvements that serve their property. So, inclusion in the growth area is a very low risk endeavor by the City.

Finding 42: Feedback from owners of property in the "swiss cheese" holes ranged from support to opposition. Supporters felt that the City's lack of planning has led to the City's current problems and they fear that further development without better planning will only serve to exacerbate problems.

Opponents repeatedly stated that the rural character of this area was the reason for their moving to the area. Ultimately, they understood that only scenarios #1 and #2 would preserve their quality of life, though a couple of them argued that 2 to 5 acre lots in the County preserve their rural character and also minimize the impact to the City. (Good for them but still leaving the burden on the City.)

Opponents also pointed out that the County recently adopted the small-holders designation on its comp plan map and cited that there was overwhelming support for the small sized rural lots such a designation allows. Others noted that while the small-holder designation did exist, the area is largely un-zoned so regulations allowed for planned unit residential developments that could allow for higher densities.

Staff did not make an effort to dive into this issue because application of the County regulations wouldn't be relevant at this point. (If property owners wish to explore the planning impacts of the County plans and regulations on their property, they should contact County staff for advice.) The purpose of this planning effort is to establish what kind of planning efforts the CITY wants to engage in. Negotiating with the County for updates to the County plan would be the next planning effort once staff has such direction.

Staff's Conclusion: Scenario #5 is a viable option for implementing the 2036 population and represents a very good way to scope the City's growth pattern. The area within Option #5 also represents an efficient and effective method for planning utilities and infrastructure. Furthermore, the City's topographical constraints limit its options for efficient growth to the north and the city is further encumbered by the Lewis River and both I-5 and the train tracks. This leads to a conclusion that south would be the logical and feasible location for growth.

Scenario 6 – Woodland Bottoms Planning – Recognizing that all activity within the bottom lands generates impacts (like traffic) in the City of Woodland, the City will look at the practical implication of growth within the bottomlands. Including planning for growth impacts that occur in Cowlitz County.

Finding 43: Staff's experience and comments from the public recognize that the City of Woodland is having to deal with considerable growth problems for growth that is occurring outside of its jurisdiction. Specifically, growth that is occurring in southern Cowlitz County that results in traffic on Green Mountain Road and Lewis River Road; northern Clark County that results in traffic on Lewis River Road and the Hayes Road/CC Street bridge; and growth on the Woodland Bottoms. It is a generally accepted statement that the City of Woodland should be planning for the impact of growth and development.

Finding 44: Existing human activities including growth in the bottoms effects the City and has put a strain on the city's services and infrastructure, often without any financial contribution to the provision of those services. As such, preservation of quality of life factors for current residents of the bottoms is coming at a direct cost to city residents and business. Making a scenario decision other than Scenario #6 would only serve to protect Cowlitz County resident needs above those of property owners within the City.

Future development on the bottoms is inevitable and the only equitable way to ensure that such growth pays for itself and is not subsidized by those currently within the City, would be to include the bottoms in the City's UGA for planning purposes.

Finding 45: The use of GMA tools like the City's impact fees will provide the City with a funding mechanism to deal with the impacts of growth. Without inclusion of the bottoms in the UGA, the City will be severely limited, or incapable outright, of being able to recover some of the costs of the external growth that is affecting the City. For planning purposes, the City should be considering even the external development impacts that affect the community.

Finding 46: The use of GMA tools like the City's critical areas ordinances will ensure that the City has the opportunity to protect critical resource lands as growth occurs.

Finding 47: The presence of large tracts of land owned by the port, industrial development, and commercial development which is urban in nature lends itself to be included in an urban growth boundary. Further similar development is inevitable and the impacts from that development will affect the City for planning purposes.

Finding 48: Pressure to develop urban uses on agricultural land within the bottoms will be tempered by the requirement to extend urban services prior to development. The speed of development on the agricultural land east of N Goerig Street is an example of how service delivery affects the conversion of agricultural land. City services will not be extended beyond City limits and the City Council would have to annex the property in order for development to occur. The City would therefore have to carefully consider conversion of agricultural land as a matter of policy. Extension of the UGA will allow the city to develop a preservation policy for planning purposes.

Staff's Conclusion: Scenario #6 is a viable option for implementing the 2036 population projection adopted under the comp plan. In addition, it represents the best opportunity for the City to plan for future growth that affects City services and infrastructure (internally and externally).

General Observations

Finding 49: The City is engaging in a water and sewer utility planning process for the industrial area east of the railroad tracks. This effort will include not only a capacity analysis but also an evaluation of the infrastructure of the City's system. Knowing whether there is going to be development south of this area, and how much of a growth area should be considered, seems to staff to be a vital factor that needs to be included in that work.

Finding 50: The City is engaging in a review of Exit 21 and the traffic circulation that affect it. Making a growth scenario decision as part of this process will ensure that the City is effective in its evaluation of Exit 21. Growth scenarios #5 and #6 represent the most far sighted method for performing that analysis in a comprehensive manner. Given the lead time needed to obtain funding for improvements on the Interstate system, failing to adopt a growth scenario, or adoption of a short-sighted growth scenario, would lead to delays in funding fixes that could add years or decades to the timetable. (For example, if Exit 21 had

been studied in 2013 instead of the Scott Avenue Reconnect project, Exit 21 could be a funded improvement project with construction already under way.)

Finding 51: Significant input was received regarding the preservation of rural quality of life. The City's Community Development Department is sensitive to this issue, but it is fundamentally tasked with the health, safety and welfare of those residents and property owners within the City of Woodland. This comprehensive planning effort is aimed at exploring and safeguarding the City's future by making good and informed decisions that will affect the City in the future. As a result, some outcomes of this effort could be seen as anti-county or anti-rural quality of life. That is not the intent of this effort. Any such perceived conflict may be the result the City's attempt to protect its residents and property owners from urban/rural inequities that exist or that may develop in the future.

Finding 52: Citizen comments emphasized protection of quality of life issues for residents of Cowlitz County. In some cases, the Growth Management Act was cited as justification for protections that the City should be affording to County residents affected by the City's planning effort. Staff appreciates and acknowledges these comments, but also must recognize that Cowlitz County is not a fully planning jurisdiction under GMA and that the City cannot enforce full GMA compliance within the County.

The City can however, influence the protection of quality of life for areas that are included within the City's UGA. This leads to the situation where rural citizens are arguing that the GMA should protect them from being included in the UGA (and therefor subject to the full protection and regulation of the GMA).

Finding 53: Citizen sentiment was expressed that the staff is pro-residential development. Staff has attempted to provide a context for the discussion that is residential centric because the clear majority of pending comp plan map amendment requests are requests for residential designation within an expanded urban growth area. Therefore, this effort is being driven by residential requests where there is insufficient direction from the comp plan. Staff has been clear that the comp plan and comp plan map have provided for both adequate industrial and commercial land supplies, but also for the provision of projected employment needs. Performing additional industrial and commercial land analysis less than three years after adoption of the comp plan will not contribute answers to the residential questions that are pending before the city. Performing an analysis of the city's residential land supply does not make staff pro-residential. Should the Commission recommend, and Council adopt Scenario #1, it will not affect how the staff performs the duties assigned by the Mayor and City Administrator or implement the policies adopted by the City Council.

Finding 54: Significant comment and discussion revolved around the financial impacts of growth (whether it is residential, commercial or industrial). Staff did engage in this discussion at the open houses but tried to only have such conversation in the context of how taxes and impact fees work.

No financial analysis was completed on the impacts of expansion of the UGA. This planning exercise is intended to help the City scope future planning decisions. The City is not making this decision based on how much revenue can or will be received because of having a better vision of its future.

The City provides budgeting information on an annual basis, including a picture of its revenues and expenditures. Citizens are welcome to participate in that process on an ongoing basis.

Nothing in this planning effort is intended to result in additional revenue for the city. It will however greatly influence how efficiently and effectively the city will invest in its infrastructure.

V. STAFF RECOMMENDATION:

Staff hereby recommends that the Planning Commission **recommend approval of Growth Scenario 6 to the City Council** based on the analysis, criteria and standards outlined in Woodland Municipal Code (WMC).

Per WMC 19.08.030, the Commission is tasked with making a recommendation to the City Council who has the decision-making authority. (also see below)

VI. SEPA DECISION:

The lead agency for this proposal has determined that it does not have a probable significant adverse impact on the environment. An environmental impact statement (EIS) is not required under RCW 43.21C.030(2)(c). This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request. As lead agency, City of Woodland staff acts as the SEPA Responsible Official (WMC 19.08.030) and a Determination of Non-Significance for this project was issued on November 29, 2018 and the determination became final on December 19th, 2018. There is no further comment period on the DNS.

VII. CONDITIONS OF APPROVAL:

1. None identified by staff at this time.

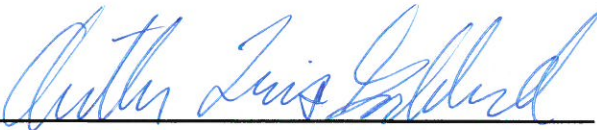
APPEAL PROCEDURE:

WMC 17.84.100 - Appeal—Council decision. - Enactment of an ordinance by the council approving an amendment shall constitute final action. When the action of the council is to deny a request for an amendment, the adoption of the motion shall constitute final action. Written notice of the action shall be forwarded to the commission to be attached to the permanent file of the case, and the city shall notify the applicant of the final action of the council.

However, in accordance with Cowlitz County Resolution 02-078 Section E a decision by the City Council will be sent to the Cowlitz County Planning Commission for review whereupon the Commission will make a recommendation to the Cowlitz County Council. The County Council is then responsible for a complete review of the City process and adoption, and the County Planning Commission's recommendation on the amendment request. Per the resolution, the City amendment (if approved) would be adopted as an amendment to the County's Comprehensive Plan.

Responsible Official: Travis Goddard, Community Development Director
City of Woodland
PO Box 9
230 Davidson Ave
Woodland, WA 98661
goddardt@ci.woodland.wa.us

Date: 12/17/2018

Signature: _____

cc: Planning Commission
Applicant
Parties of Record
Mayor
File
Website
City Administrator

ATTACHMENTS

Documents listed at <http://www.ci.woodland.wa.us/departments/planning/comprehensive.php>