

Community Development Department

Building • Planning • Code Enforcement

P.O. Box 9, 230 Davidson Avenue

Woodland, WA 98674

www.ci.woodland.wa.us

Building: (360) 225-7299 / Planning: (360) 225-1048 / Fax: (360) 225-7336

Vacant buildable land within the City of Woodland and its UGA

ISSUE DATE: January 31, 2019

Comprehensive Plan Map Amendment 2018-2019

I. EXECUTIVE SUMMARY

2016 – 2019 Development Analysis

Residential Development (174 acres per 2016 Comp Plan)

	City Limits	Cowlitz UGA	Clark UGA	Total
Gross land available	141.44	47.66	82.12	271.22
Net land available	63.79	26.07	33.55	123.41
Gross units	1397	138-689	0	1535
Net units	601	73-367	0	674
Practical units	314	31	0	345
Predicted Units	314	31	0	345

Single-family units built since 2016:	129
Multi-family units built since 2016:	8
Remaining units to be built:	1,155
Projected shortfall in units:	810 (-70.1%)

Commercial Development (124 acres per 2016 Comp Plan)

Number of commercial developments:	15
Acres developed or in construction:	33.68 (27.2%)
Number of projects in planning process:	2
Acres planning to be developed:	18.38 (+14.8%)
Remaining developable acres:	76.24 (58%)

Industrial Development (548 acres per 2016 Comp Plan)

Number of industrial developments:	11
Acres developed or in construction:	84.08 (15.3%)
Number of projects in planning process:	5
Acres planning to be developed:	65.27 (+11.9%)
Remaining developable acres:	398.65 (72.8%)

II. INTRODUCTION

The City of Woodland is engaged in an annual review of its Comprehensive Plan which was last updated in 2016. This review was initiated by the submittal of applications for comprehensive plan map amendments. These applications include requests to change comprehensive plan designations already covered by the City's Comp Plan map, and applications to expand the Urban Growth Area (UGA) identified on the existing map.

As part of the analysis for these requests the City is required under RCW 36.70A.110 to review the densities of developments and to determine whether the UGA is adequately sized to accommodate the plan's projected urban growth.

Section III of this report discusses the methodology used to analyze the City's adopted UGA and growth assumptions from the 2016 comp plan. Section IV provides the analysis and conclusions from the staff's review.

III. METHODOLOGY FOR REVIEWING VACANT BUILDABLE LAND WITHIN THE CITY LIMITS AND THE AREA IDENTIFIED AS URBAN GROWTH AREA IN THE 2016 COMP PLAN UPDATE.

In the 2016 City of Woodland Comprehensive Plan, Table 3.1 Woodland Planning Assumptions and Targets, states the following:

- Undeveloped Residential Land – 174 acres
 - Projected Low Density new housing starts (4 units per acre)
 - Projected High Density new housing starts (20 units per acre)

- Undeveloped Commercial Land – 124 acres
 - Projected New Commercial Jobs (20 per acre)

- Undeveloped Industrial Land – 548 acres
 - Projected New Industrial Jobs (4 per acre)

For the purposes of the 2018-19 update, staff took those adopted assumptions and applied a practical approach of reviewing development permitting activity during the last three years to determine how much of the land has been consumed by development activity (see attachments).

Given that the 2016 Comp Plan 20-year horizon included growth projections through 2036, a base assumption of 15% was established for the purposes of an update in 2019 based upon the fact that three years have elapsed since adoption of the comp plan (2016, 2017 and 2018) (i.e. 3 of 20 years have elapsed = 15% of the time).

For commercial and industrial growth projections, staff used the City's permitting records to identify the number of projects that were approved and for which development activity has occurred. The resulting attachments show the size of each project and how they affected the supply of land available for development. This approach was effective because all the projects fronted on existing public streets, occurred on lots that were the result of approved land divisions, and were generally unaffected by critical areas because the constraints were incorporated into the site plan approval for the development.

The residential land supply was calculated in a different manner because, unlike commercial and industrial developments, residential developments involve the further division of land as opposed to using divided lots. As a result, residential developments are more likely to be significantly affected by critical area encumbrances and dedications of land for utility and rights-of-way. For this reason, the residential land supply was reviewed for development potential as opposed to trying to track past consumption.

To analyze the residential capacity of vacant land within the City and in the UGA, staff used GIS and other on-line mapping resources to identify property that could generally be classified as vacant (or sufficiently vacant as to make redevelopment possible). With those maps, staff developed a list of properties that were zoned for residential development, cross referenced these properties with mapped critical areas resources, then assumed that 20% of the gross property area would be dedicated as right-of-way or utilities.

These methods were applied for property both within the City and within the UGA. The result of these efforts is discussed in the following sections.

IV. LAND CONSUMPTION AND AVAILABILITY

Residential Land Supply

Staff’s initial review of the comp plan assumptions and the available land supply led to several conclusions. Specifically, that there was insufficient land to accommodate the city’s projected residential growth, and that the city had insufficient high-density and medium-density zoning to accomplish its goal for a mix of single-family multi-family housing.

Since adoption of the comp plan, all the residential development that has occurred within the City has occurred in low-density zoning districts except for Sequoia Park which was a medium density project. However, it needs to be noted that the townhomes are only considered multi-family units because there are four of them in a single structure, but there were developed at densities closer to the low-density rate than the high-density rate. As a result, the functional pattern of residential development has been low-density residential.

The 2016 Comprehensive Plan identified 174 acres of land available for residential development capable of providing for 673 low-density units and 619 units of high-density residential development. There is also a stated policy for a 60% single-family to 40% multi-family residential ratio.

Table 1 - The building permit activity since 2016.

Unit Type	2016	2017	2018	2019
Duplex			6	
Single-Family	63	54	6	
Multi-Family			8	
Total	63	54	20	

This table shows that 94.2% of the new units constructed since 2016 have been single-family residences.

As staff reviewed the available land left to develop, staff’s conclusion was that the City could accommodate approximately 250 additional units within its limits and UGA.

Available Residential Land

Staff identified 141 acres of potentially developable land with the City limits, an additional 47.66 acres in the UGA for Cowlitz County and 82.12 acres within the Clark County UGA. Using the City’s planning assumptions of either 4 or 20 units per acre, simple math would dictate that there is adequate land for accommodating the residential growth goals.

Table 2 – Residential Gross Acreage Distribution

	Gross Acres	Net acres after critical areas & right-of-way/utility dedications
Within City Limits	141.44	63.79
UGA (Cowlitz)	47.66	26.06
UGA (Clark)	82.12	33.55
Total	271.22	123.4

But not all property is developable. For example, the portion of the City’s UGA in Clark County is problematic. In addition to being highly encumbered with wetlands and shoreline issues, the Clark County Comprehensive Plan allots zero population growth for the City of Woodland and one of the lots is already functioning as a RV park. So, the development potential for this land is questionable.

High-Density Opportunities

There is one site that is zoned high-density residential. That site has enough size to accommodate 506 units using the comp plan’s 20 unit per acre density; but using the highest density available by zoning, it could accommodate 885 units (see parcels #21 thru #26 on Attachment A).

However, it also needs to be noted that 80% of the property zoned High-Density Residential is within the floodway of the Lewis River, with 100% of it within the floodplain. Given these constraints, and the fact that the property is a shoreline of statewide significance and is also mapped as riparian habitat, the likelihood of achieving any of the city’s multi-family unit projection is unlikely.

In staff’s opinion, the only viable high-density housing opportunity in the City is on Green Mountain Road (and is zoned medium density). This property is also problematic because it is 1,200 feet from the closest gravity sewer main or it would require construction of a sewer pump station to access a pressure main. Therefore, until commercial development in the area occurs, this site is also unlikely to develop in the near future. (Development within the 20-year planning horizon is a likely possibility.)

Based upon this, planning staff estimates that there is capacity for approximately 119 multi-family units to be built within the City’s limits as currently designated and zoned.

Within the UGA, staff estimated that there are five potential properties with a potential capacity for an addition 196 units of multi-family residential. All those properties have environmental constraints and are unlikely to develop as multi-family residential. The Planner’s best estimate is that a maximum of 70 multi-family units are likely to occur.

Table 3 – Residentially developable land within the UGA

Parcel ID	Acres	Useable	UPA	Gross	Net	Planner's Estimate
49	4.9	1.176	20	98	24	0
54	11.92	5.7216	20	238	114	150
56	1	0.8	20	20	16	16
57	2.72	2.176	20	54	44	30

(Refer to Attachment A for parcel data and analysis)

Low-Density Opportunities

There are approximately 87.21 acres of vacant or underdeveloped land zoned for low density residential within the City limits. There is also an additional 129.6 acres of residential land in the UGA (47.66 in Cowlitz County and 82.12 acres in Clark County).

Of the properties within the City, after adjusting for critical areas and the amount of land that will be needed for road and utility dedication, there is approximately 42.2 net acres for low density residential. Using the comp plan’s assumption density of 4 units per acre, the result would be 169 additional units. Based on staff’s analysis, that number was adjusted to 165 units due to the unlikelihood that several large river-front lots will subdivide.

Within the growth area for Cowlitz County, the same five parcels discussed above were identified as potentially developable. All the remaining lots are small residential lots that are unlikely to divide for additional units. As above, the five developable properties are constrained in their developable area so the gross units (138) were adjusted to a net unit count of 73. The planner’s analysis again adjusted the development potential to 31 units.

Within the growth area for Clark County, one of the two parcels is completely developed as an RV park, and the other is highly constrained by critical areas. In addition to the noted Clark County comp plan problem, staff noted that the current development potential for this lot is zero units because of the owner’s desire to not develop.

Commercial Land Supply

The 2016 Comprehensive Plan identified 124 acres of land available for commercial development.

Since that time, staff determined there have been 15 commercial developments on a total of 33.68 acres. That development represents 27.2% of land available under the plan.

In addition, staff has identified two additional projects that have applied for or completed the pre-application conference process and which staff is confident will result in development applications within the calendar year 2019. Those projects are projected to develop another 14.08 acres, representing a 4-year consumption of 38.5% of the City’s commercial land supply.

There are also two public or quasi-public projects (the library and the YMCA) which are on commercially zoned property and will occupy an additional 4.3 acres or 2.3% of the available commercially zoned property.

Commercial UGA - There is 4.19 acres of land within the UGA that is designated as Commercial. Those two parcels are fully developed with commercial activities and therefore do not provide any potential for accommodating the City's projected growth. If that acreage was functionally removed from the 124 acres of commercial land, it would represent 3.3% of additional land that is unavailable for commercial development as contemplated in the comp plan.

As a result, it is possible that 44.1% of the City's commercial land supply will be developed.

Industrial Land Supply

The 2016 Comprehensive Plan identified 548 acres of available Industrial land.

Since that time, staff determined that there have been 11 industrial projects that have been completed or that are currently in construction. These projects account for approximately 84.08 acres of development since 2016. That represents a consumption of 15.3% of the available land for industrial development (see Attachment C).

In addition to those completed projects, staff has identified five additional projects that have been applied for or completed the pre-application conference process. Staff is confident that all five of these projects will result in development applications within the calendar year 2019. Those projects are projected to develop another 65.27 acres, representing a 4-year consumption of 27.2% of the City's industrial land supply.

Industrial UGA - There is also 9.3 acres of land within the UGA designated as Industrial. Of those parcels, all are developed residentially at rural densities. Staff did not subtract this acreage from the overall land supply because it is possible that redevelopment can occur.

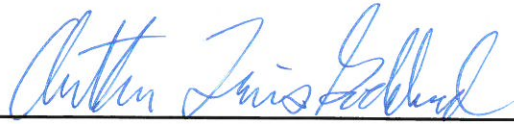
V. CONCLUSIONS:

1. The city is three (3) years (or 15%) into the 20-year growth planning period.
2. It is projected that there is room for 345 additional residential units (26.7%) on top of the 137 units (10.6%) that have already been constructed since the comp plan was adopted.
3. There is inadequate residential land within the City Limits and the UGA to accommodate the adopted residential growth target unless all future residential developments were to occur at high (20-units per acre) densities. Otherwise additional land will need to be re-designated for residential purposes OR the UGA will need to be expanded to include new residential land.
4. The industrial land supply is adequate to implement the adopted growth assumptions.
5. The Commercial land supply is developing at an accelerated rate. To date, 27.2% of the commercial land has been developed. Within two years, an additional 13.6% will be developed. The City will be 25% of the way through the planning period with 44.1% of the commercial land supply developed. This warrants further monitoring in the future.

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: 1/31/2019

Signature: _____



ATTACHMENTS

- A – Residential Land Data
- B – Commercial Land Data
- C – Industrial Land Data

Residential Development Potential within the City Boundaries

Single Family

ID	Parcel #	Owner	Zoning	Acres	-CAO	Useable*	UPA	Gross	Net**	Planner's Estimate
1	26302	PUD #1	LDR 8.5	1.3	N/A	N/A	N/A	N/A	N/A	0
2	508190100	Triangle Holdings LLC	LDR 8.5	5.03	15%	3.4204	4	20	14	
3	508210100	Triangle Holdings LLC	LDR 8.5	5.01	55%	1.8036	4	20	7	
4	508220100	Triangle Holdings LLC	LDR 8.5	5.01	40%	2.4048	4	20	10	
5	508230100	Triangle Holdings LLC	LDR 8.5	5.01	60%	1.6032	4	20	6	
6	508240100	Triangle Holdings LLC	LDR 8.5	5.01	60%	1.6032	4	20	6	
7	508250100	Triangle Holdings LLC	LDR 8.5	5.01	30%	2.8056	4	20	11	
8	508260100	Triangle Holdings LLC	LDR 8.5	6.7	30%	3.752	4	27	15	
9	506800013	Triangle Holdings LLC	LDR 8.5	5.42	0%	4.336	4	22	17	
10	508280100	Triangle Holdings LLC	LDR 8.5	1.89	0%	1.512	4	8	6	
11	508300100	Triangle Holdings LLC	LDR 8.5	1.89	0%	1.512	4	8	6	
12	508440101	Pacificcorp	LDR 7.2	7.97	N/A	N/A	N/A	N/A	N/A	0
13	508440100	Quail Meadows (Lot 1)	LDR 7.2	6.51	0%	5.208	4	26	21	21
14	508520100	Northwest Inv (Lot 2)	LDR 7.2	2.57	0%	2.056	4	10	8	8
15	508520101	Sage Inv (Lot 3)	LDR 7.2	9.79	85%	1.1748	4	39	5	4
16	508390102	Bond	LDR 7.2	1	0%	0.8	4	4	3	1
17	508390103	Bond	LDR 7.2	1	0%	0.8	4	4	3	1
18	508850100	Lefebber	LDR 8.5	2.45	0%	1.96	4	10	8	8
19	508860100	Four Crows	LDR 8.5	3.33	15%	2.2644	4	13	9	9
20	509010100	Four Crows	LDR 8.5	5.31	25%	3.186	4	21	13	13
21	506520100	Triangle Holdings LLC	HDR	8.08	80%	1.2928				
22	506520500	Triangle Holdings LLC	HDR	2.3	90%	0.184				
23	506520400	Triangle Holdings LLC	HDR	2.11	70%	0.5064				
24	506520300	Triangle Holdings LLC	HDR	2.17	40%	1.0416				
25	5065201	Triangle Holdings LLC	HDR	2.6	30%	1.456				
26	50650	Triangle Holdings LLC	HDR	8.13	55%	2.9268				
27	5064902	First Baptist	HDR	2.85	90%	0.228				
28	506490201	First Baptist	HDR	1.43	0%	1.144				
29	50636	The Promise	MDR	13.5	45%	5.94				
30	50235025	The Promise	MDR	0.4	0%	0.32				
31	506360600	The Promise	MDR	0.48	0%	0.384				
32	506360400	The Promise	MDR	0.29	0%	0.232				
53	508630100	Pronenko	MDR	9.89	25%	5.934				

LDR within the City...
87.21 LDR acres
42.2 Net LDR acres
312 Gross LDR units
169 Net LDR units
164 Estimated LDR units

Multi Family

UPA	Gross	Net**	Planner's Estimate
20	162	26	
20	46	4	
20	42	10	0
20	43	21	
20	52	29	
20	163	59	
20	57	5	0
20	29	23	0
20	270	119	
20	8	6	0
20	10	8	
20	6	5	
20	198	119	119

City Limits Residential Land: 141.44 63.7916 312 169 164

* assumes 20% for infrastructure and factors in the critical areas encumbrances for the property.
** Usable acreage times the units per acre defined by Comp Plan policy to estimate the net units the property is likely to support.

Residential Development Potential within the UGA

Single Family

ID	Parcel #	Owner	Zoning	Acres	-CAO	Useable*	UPA	Gross	Net**	Planner's Estimate
33	60844	Lemay	RES	0.91	50%	0.364	4	4	1	0
34	6084401	McKay	RES	0.65	40%	0.312	4	3	1	0
35	6085801	Couve Enterprises	RES	1.22	80%	0.1952	4	5	1	0
36	6085802	Pananen	RES	0.4	30%	0.224	4	2	1	0
37	60858	Ripp	RES	0.44	25%	0.264	4	2	1	0
38	60848	Jensen	RES	3.34	20%	2.1376	4	13	9	6
39	60854003	Homola	RES	0.88	0%	0.704	4	4	3	0
40	60854002	Dickinson	RES	0.24	0%	0.192	4	1	1	0
41	60854001	Manrique	RES	0.24	0%	0.192	4	1	1	0
42	60854	Burns Trust	RES	0.47	30%	0.2632	4	2	1	0
43	6085403	Meyers	RES	0.57	30%	0.3192	4	2	1	0
44	6085401	Hartley	RES	0.8	20%	0.512	4	3	2	0
45	608520100	Wasel	RES	0.47	20%	0.3008	4	2	1	0
46	608520101	Wasel	RES	1	15%	0.68	4	4	3	0
47	60851	North River	RES	1	0%	0.8	4	4	3	0
48	6085402	Prudhoe Bay Freight	RES	1.3	0%	1.04	4	5	4	0
49	60119	Kopman	RES	4.9	70%	1.176	4	20	5	6
54	60146	Billups	RES	11.92	40%	5.7216	4	48	23	10
55	601540100	Little League	PQPI	11.9	30%	6.664	N/A	N/A	N/A	0
56	60154	Leifson	RES	1	0%	0.8	4	4	3	3
57	60156	Leifson	RES	2.72	0%	2.176	4	11	9	6
58	60155	Jehovahs Witness	RES	1.03	0%	0.824	N/A	N/A	N/A	0
59	60150	Jehovahs Witness	RES	0.13	0%	0.104	N/A	N/A	N/A	0
60	6015003	Jehovahs Witness	RES	0.13	0%	0.104	N/A	N/A	N/A	0

Multi Family

UPA	Gross	Net**	Planner's Estimate
20	18	7	0
20	13	6	0
20	24	4	0
20	8	4	
20	9	5	
20	67	43	28
20	18	14	0
20	5	4	0
20	5	4	0
20	9	5	0
20	11	6	0
20	16	10	0
20	9	6	0
20	20	14	0
20	20	16	0
20	26	21	0
20	98	24	24
20	238	114	150
N/A	N/A	N/A	0
20	20	16	16
20	54	44	30
N/A	N/A	N/A	0
N/A	N/A	N/A	0
N/A	N/A	N/A	0

Growth Area Residential land: 47.66 26.0696 138 73 31

* assumes 20% for infrastructure and factors in the critical areas encumbrances for the property.
** Usable acreage times the units per acre defined by Comp Plan policy to estimate the net units the property is likely to support.

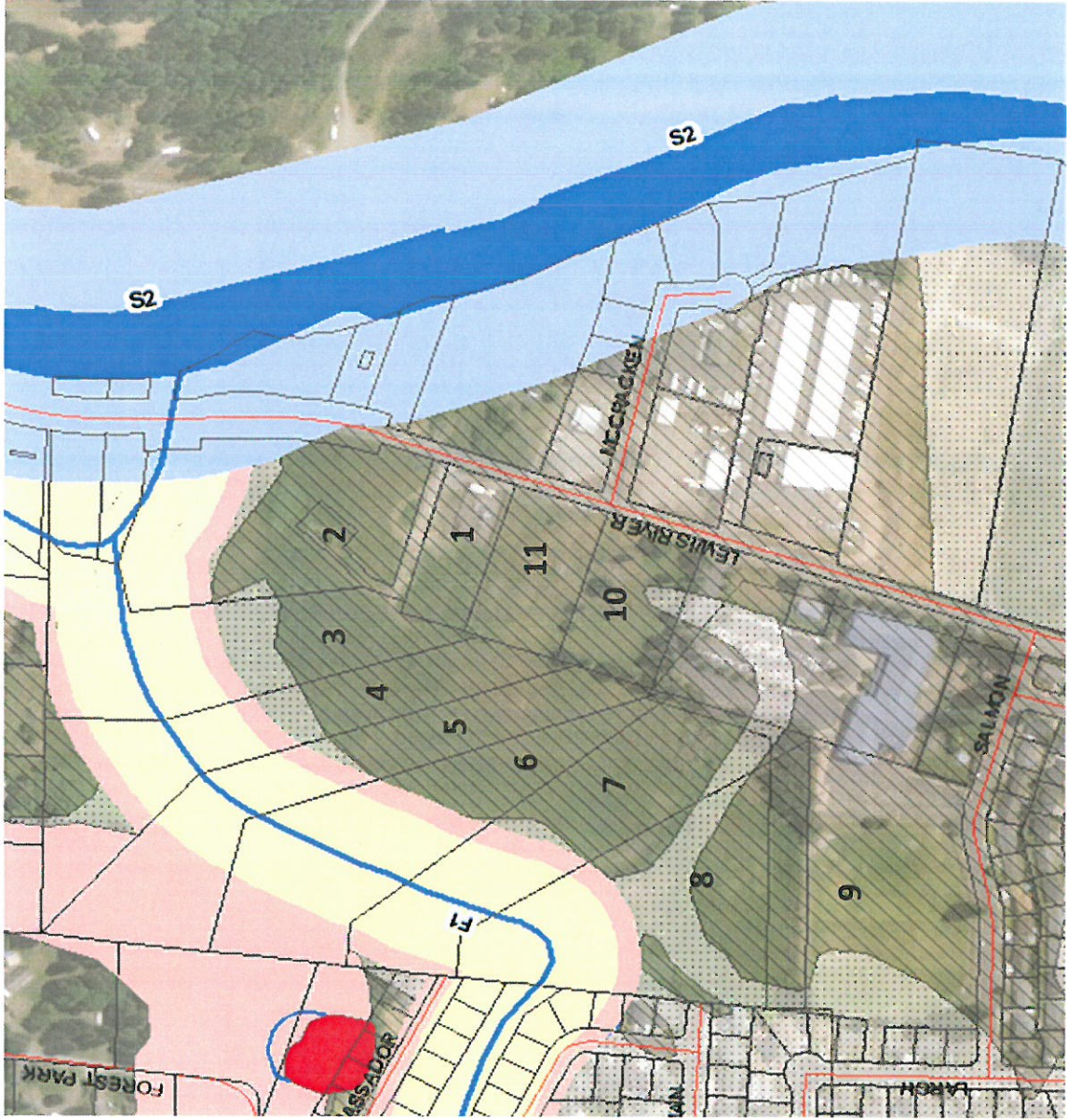
Residential Development Potential within the CLARK COUNTY UGA

ID	Parcel #	Owner	Zoning	Acres	-CAO	Useable*	UPA	Gross	Net	Planner's Estimate
50	CC 255196000	Wills	RES	78.98	50%	31.592	N/A	N/A	N/A	0
51	CC 255211000	Wills	RES	0.96	50%	0.384	N/A	N/A	N/A	0
52	CC 603252000	Mattila	RES	2.18	10%	1.5696	N/A	N/A	N/A	0

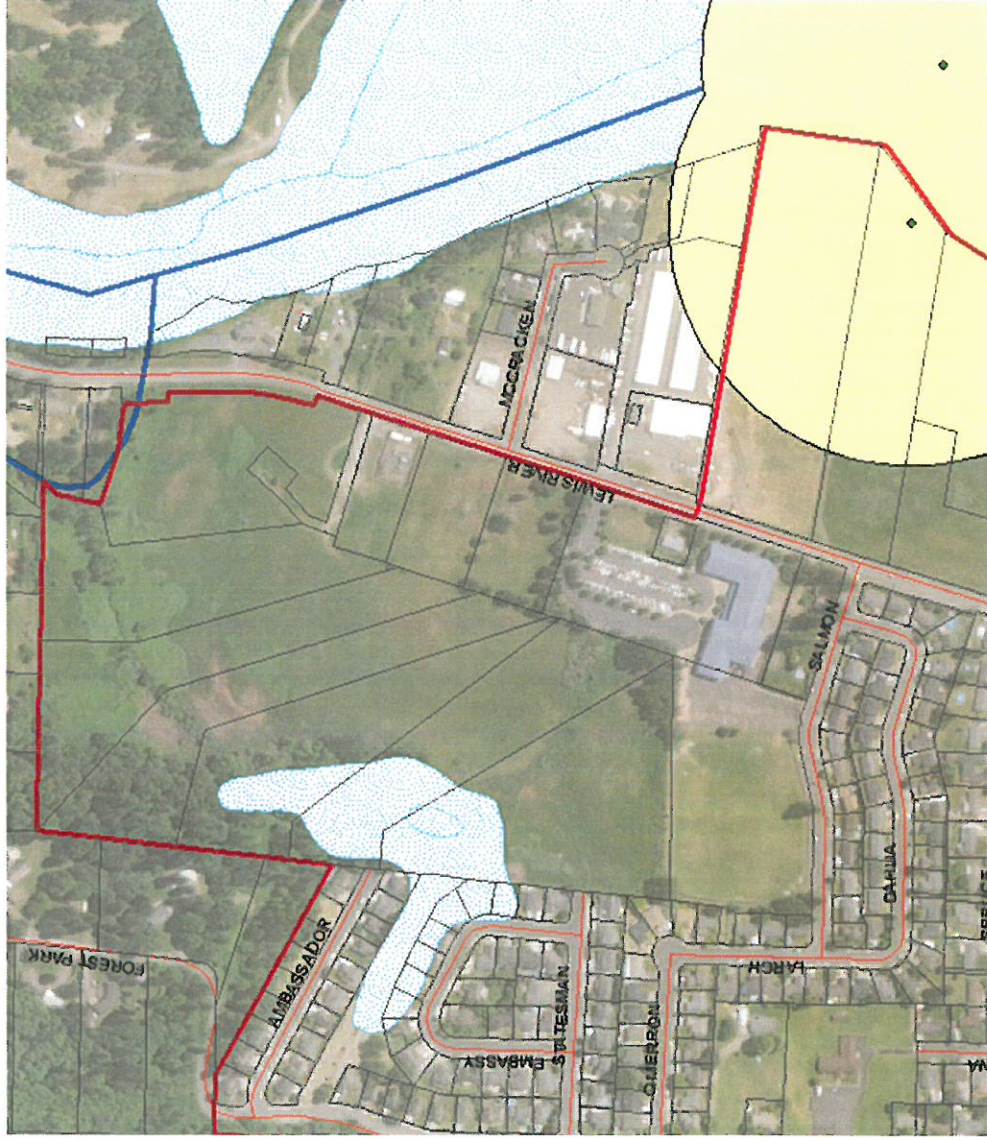
NOTE: Clark County's Comp Plan allocates zero (0) population growth for Woodland so growth in UGA will cause GMA compliance problems.

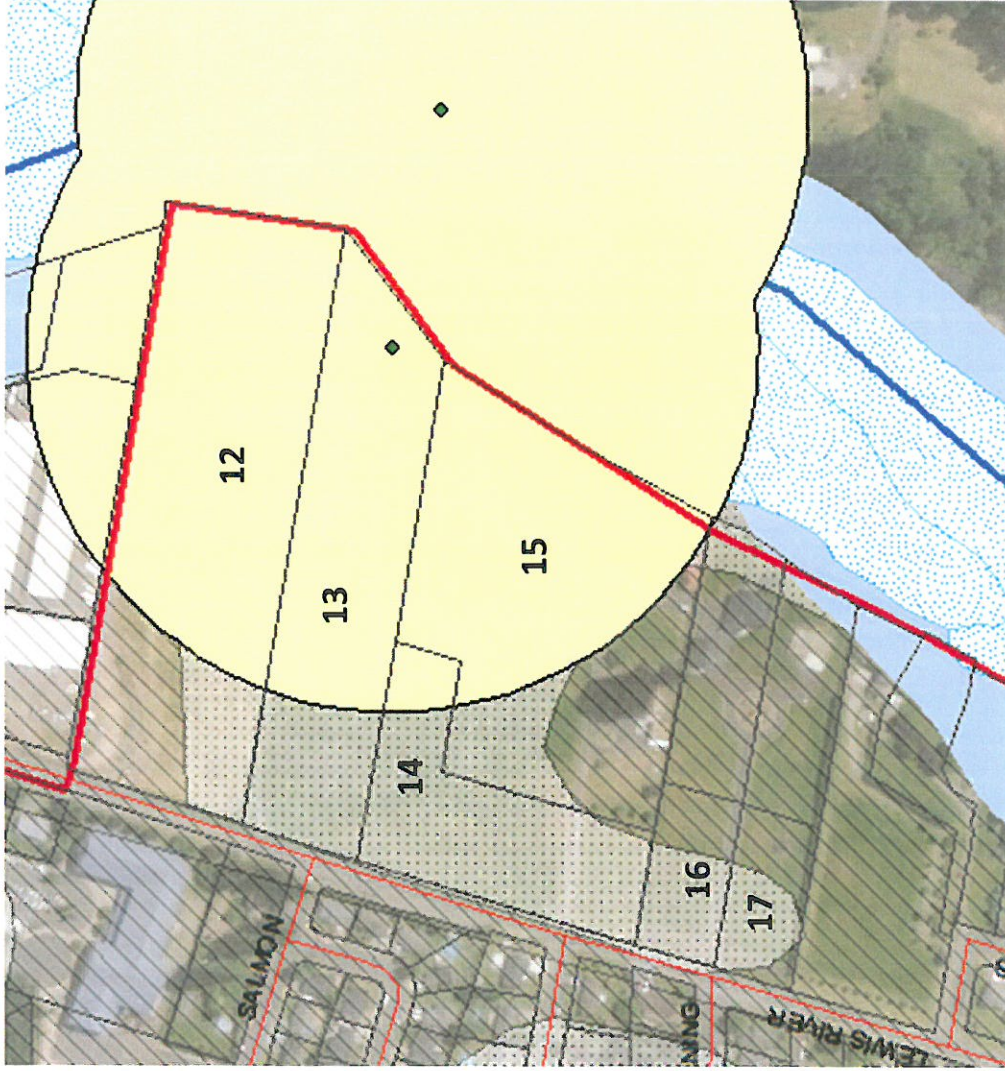
* assumes 20% for infrastructure and factors in the critical areas encumbrances for the property.
** Usable acreage times the units per acre defined by Comp Plan policy to estimate the net units the property is likely to support.

COG
Environmentally
Sensitive
Layer



Fish & Wildlife layer



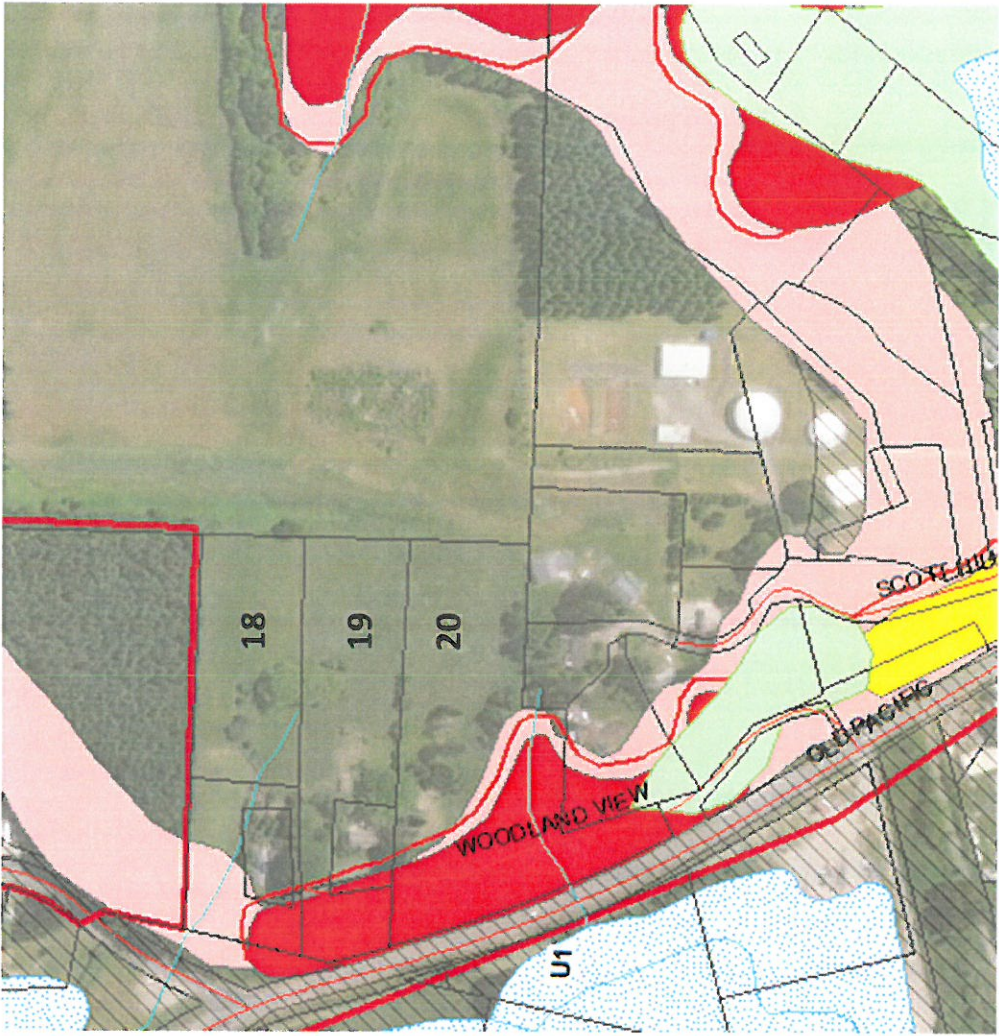


Parcels 13 thru 15 have been boundary line adjusted to place the floodway on one lot.

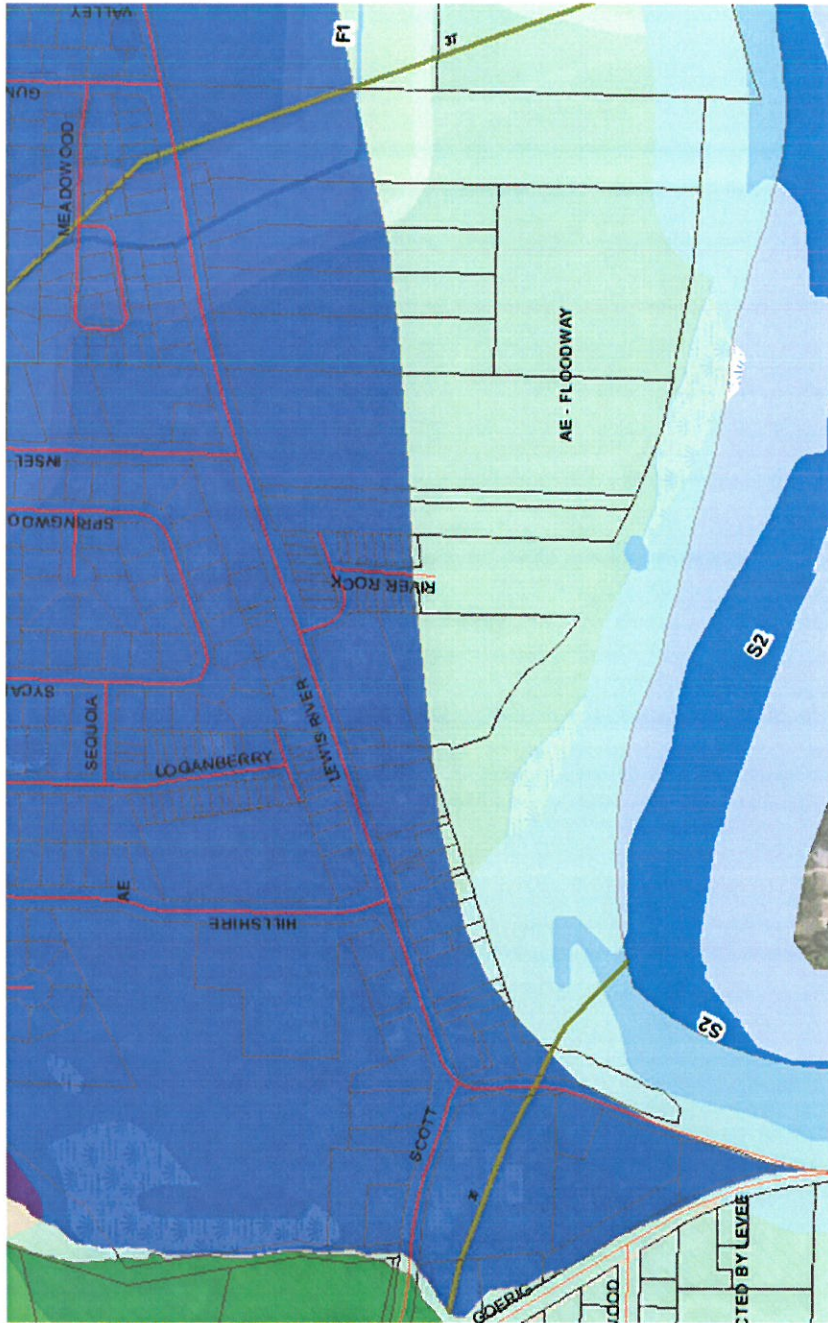
List reflects new lot shapes/sizes.

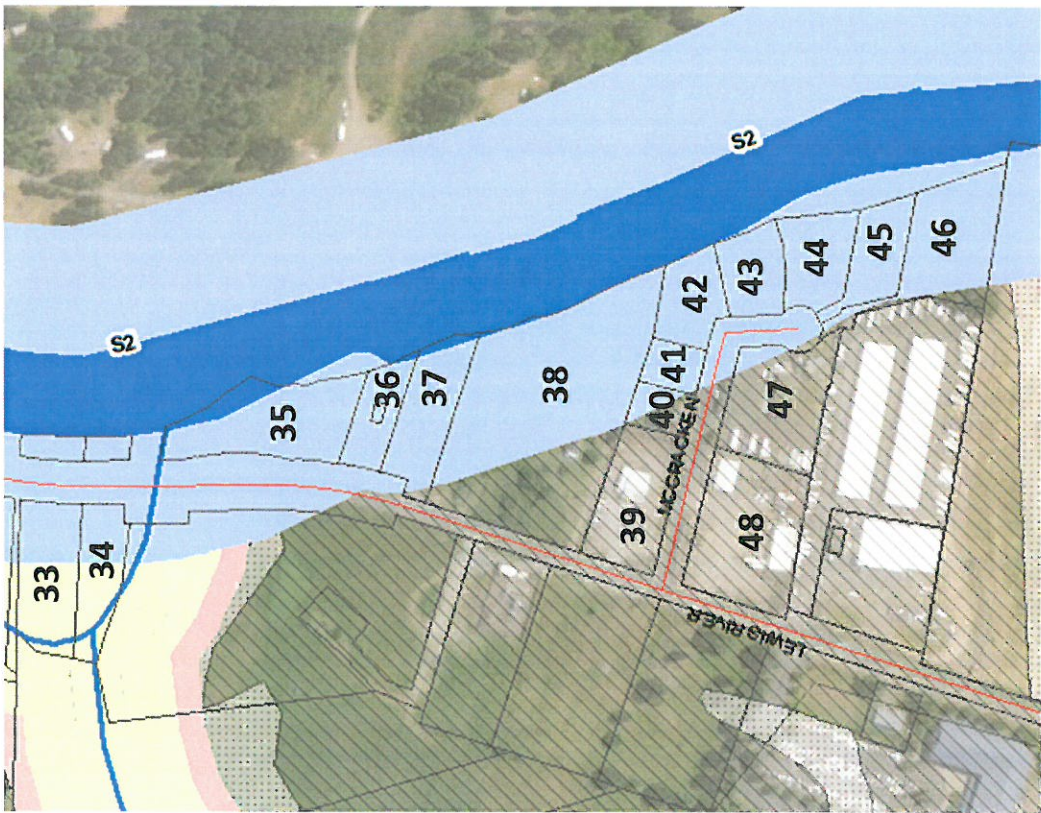
Bald Eagle nest sites (in yellow)
Shoreline extends onto the lots

Lot 12 is the fish hatchery.

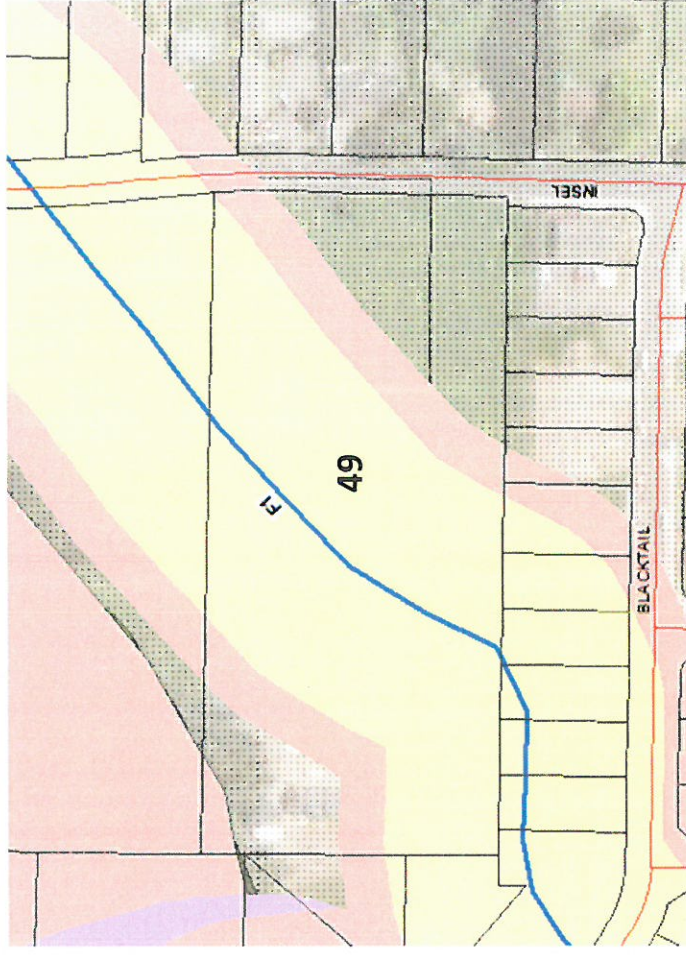


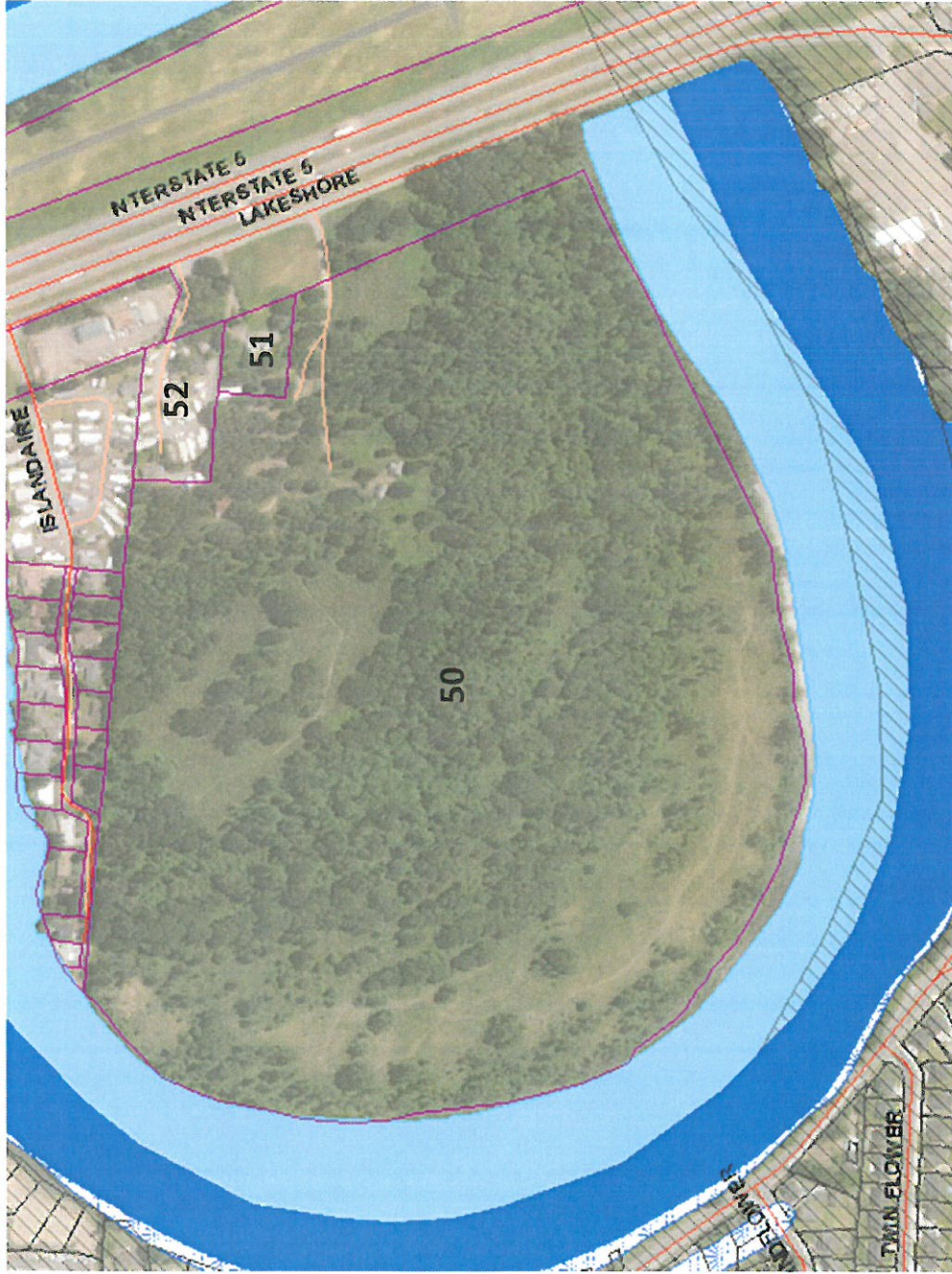






UGA Lot on Insel Street

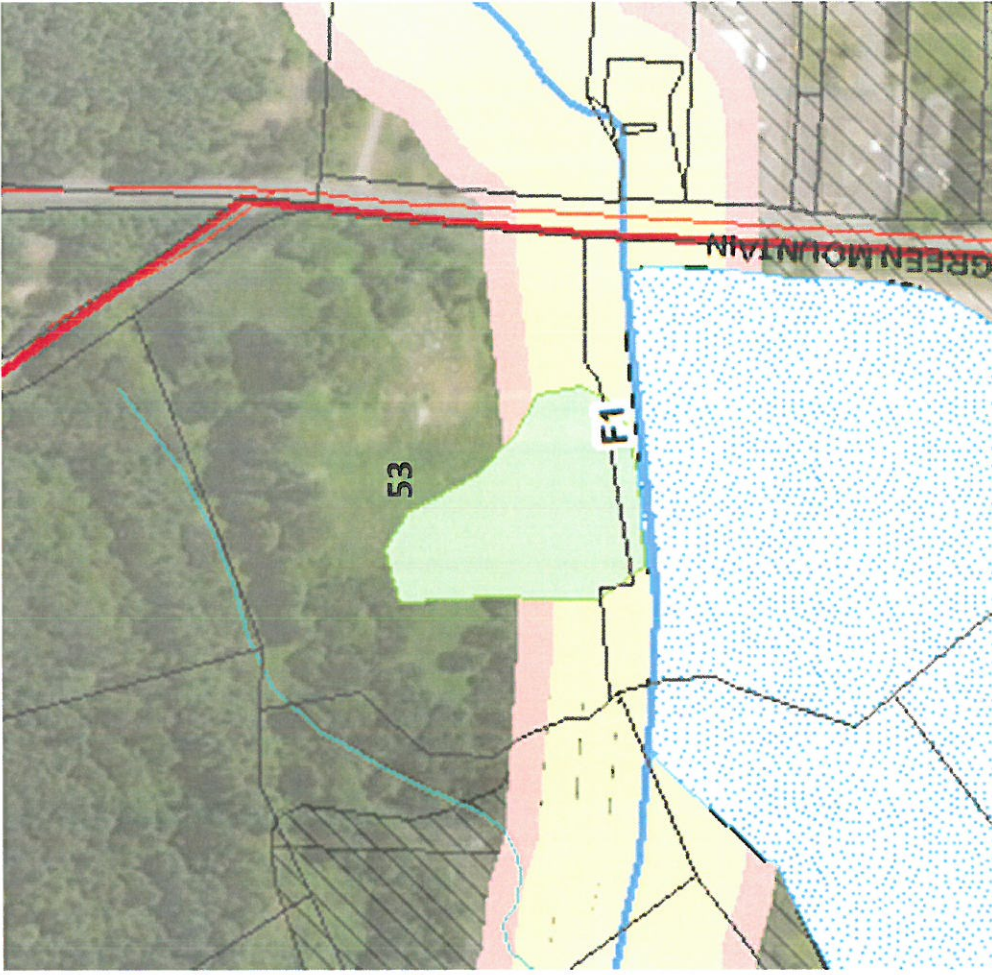


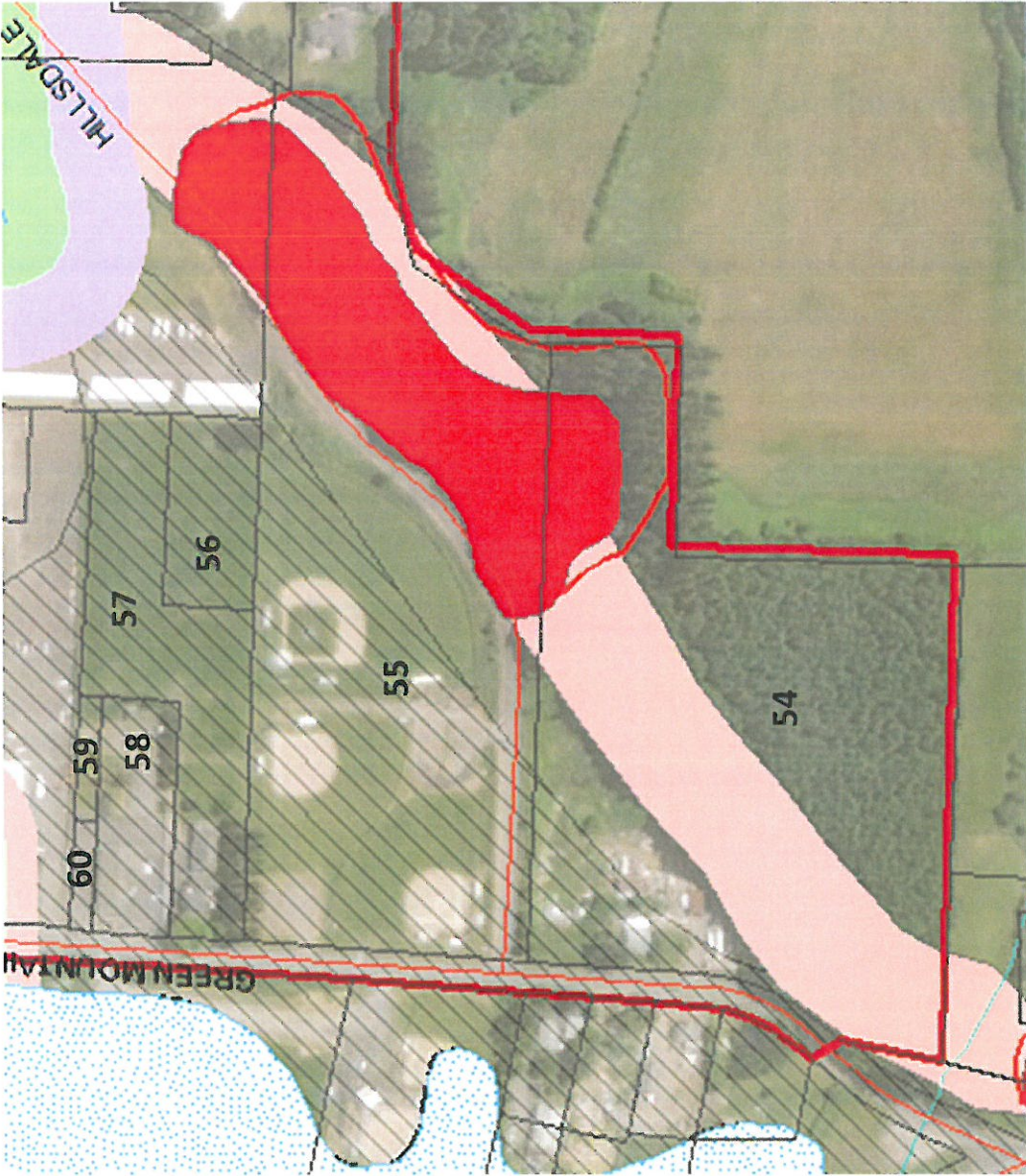


Clark County

There is no growth allocation for Woodland in the Clark County Comprehensive Plan.







Commercial Development within the City Boundaries

ID	Parcel #	Owner	Zoning	Acres	Available*	Year	% left
Starting assumption for commercial land:					124		
1	50680015	Chevron-Skippers	C-2	1.1	122.9	2016	99.1%
2	504211606	Fleager	C-2	1.55	121.35	2017	97.9%
3	504211607	Fleager	C-2	1.17	120.18	2019**	96.9%
4	507870103	Trailer Depot	C-2	1.81	118.37	2018	95.5%
5	507870101	AM/PM	C-2	3.4	114.97	2018	92.7%
6	507870100	Kimmett/Phone	C-2	1.26	113.71	2017	91.7%
7	5062302	City Fire Station	C-2	1	112.71	2016	90.9%
8	50615	BYMB	C-2	15.83	96.88	2018	78.1%
9	508040103	Red Canoe	C-2	1	95.88	2019**	77.3%
10	504211507	Nigro	C-2	0.25	95.63	2019**	77.1%
11	504211600, 504	Belmont Loop Storage	C-2	3.71	91.92	2019**	74.1%
12	50168	Bond	C-1	0.25	91.67	2019**	73.9%
13	50451	Luna	C-2	0.44	91.23	2019**	73.6%
14	507270100	Hahn/Brittell/CQ inv.	C-2	0.55	90.68	2017	73.1%
15	50526, 50180	Frank/Greer	C-1	0.36	90.32	2017	72.8%

Acres developed since comp plan update: 33.68 90.32 Remaining acres to develop

Commercial PREAPPs (or projects)

ID	Parcel #	Owner	Zoning	Acres	Available*	Year	% left
16	508040102	Mobile Gas	C-2	0.92	89.4	2019**	72.1%
17	508600100, 508	RV Resort	C-2	13.16	76.24	2019**	61.5%
18	50480	Library	C-2	1.5	74.74	PQ/PI	60.3%
19	50475	YMCA	C-2	2.8	71.94	PQ/PI	58.0%
20							

18.38

* Uses the Comp Plan available land minus developed acreage.

**Building permits issued/construction in work.

Commercial Properties in the UGA

	60853	Lewis River Road	-	2.88	0	Fully Developed
	60852	Lewis River Road	-	1.31	0	Fully Developed

4.19

Industrial Development within the City Boundaries

ID	Parcel #	Owner	Zoning	Acres	Available*	Year	
Starting assumption for industrial land:					548		% of IND left
1	50680015	Weekender Storage	I-1	8	540	2016	98.5%
2	507810106	NW Electric	I-1	6.48	533.52	2017	97.4%
3	507350116	Columbia River Carbonates	I-2	10.06	523.46	2018	95.5%
4	507870110	Liberty Evans - ProBuild	I-1	3.04	520.42	2019**	95.0%
5	507870111	Liberty Evans - ProBuild	I-1	6.14	514.28	2019**	93.8%
6	50740	Atlas Plumbing	I-2	1.04	513.24	2018	93.7%
7	508750100	Columbia Pre-Cast	I-1	18.04	495.2	2016	90.4%
8	507350109	Riley	I-2	2.09	493.11	2019**	90.0%
9	508310100	Port (Phase 1)	I-1	12.16	480.95	2019**	87.8%
10	508710100 +	Port (Phase 2)	I-1	17.03	463.92	2019**	84.7%
11					463.92		84.7%
12					463.92		84.7%
13					463.92		84.7%
							0.0%
Acres developed since Comp Plan update:					84.08		-84.08 Acres left to develop

Industrial PREAPPs

	507870112	Liberty Evans - AirGas	I-1	5.93	457.99		83.6%
	507870113	Liberty Evans - AirGas	I-1	3.83	454.16		82.9%
	507870109	Liberty Evans Lot 2	I-1	4.54	449.62		82.0%
	507690101	Simpson Storage	I-1	2.1	447.52		81.7%
	504212017	Periformworks	I-1	2.04	445.48		81.3%
	507350141	Erlandson & Assoc.	I-2	46.83	398.65		72.7%

65.27

* Uses the Comp Plan available land minus developed acreage.

**Building permits issued/construction in work.