

Banks Urban Growth Boundary Alternatives Analysis

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Purpose/Background

The land needs analyses conducted in 2009 indicates that Banks needs to expand its urban growth boundary (UGB) by approximately 248 acres (approximately 154 acres of buildable residential land and 94 acres of commercial and industrial land). This memorandum analyzes land outside the existing UGB in accordance with procedures and requirements provided in OAR 660-024-0060 and ORS 197.298 to determine which parcels are most appropriate to bring into the City's UGB to meet forecasted 20-year residential and employment land needs.

The findings set forth in this memorandum are based on and supported by a range of background studies and source documents that have been prepared by, and on behalf of, the City of Banks. Among the most significant of these materials are the 2005 Residential Land Needs Study and the 2005 Economic Opportunities Analysis (EOA) (forecast calculations for both of these studies were revised to reflect a 2009-2029 planning period).

It is the intent of this memorandum to provide an analysis that is both in accordance with applicable state land use law and reflective of the City's growth aspirations.

Study Area

Figure 1, provided at the end of this memorandum, depicts the UGB Expansion Study Area (to be referred to as "study area" for the remainder of this memorandum). Given the small size of the City of Banks, the relatively small amount of total new land needed, and the desire of the City to grow in a compact fashion, the study area was developed by creating a square half-mile buffer using geographic information systems (GIS) software. This study area was confirmed with the City of Banks and the Department of Land Conservation and Development (DLCD). As shown in Figure 1, this analysis will consider all taxlots that are: 1) located entirely within the study area boundary; 2) intersect with the study area boundary, or; 3) lie between taxlots identified in 1) and 2).¹

¹ These taxlots are referred to as "UGB Analysis Taxlots" in Figure 1

OAR 660-024-0060 Boundary Location Alternatives Analysis

OAR 660-024-0060(1) outlines the steps and considerations that must be followed in a boundary location alternatives analysis.

- (1) When considering a UGB amendment, a local government must determine which land to add by evaluating alternative boundary locations. This determination must be consistent with the priority of land specified in ORS 197.298 and the boundary location factors of Goal 14, as follows:
 - a) Beginning with the highest priority of land available, a local government must determine which land in that priority is suitable to accommodate the need deficiency determined under 660-024-0050.
 - b) If the amount of suitable land in the first priority category exceeds the amount necessary to satisfy the need deficiency, a local government must apply the location factors of Goal 14 to choose which land in that priority to include in the UGB.
 - c) If the amount of suitable land in the first priority category is not adequate to satisfy the identified need deficiency, a local government must determine which land in the next priority is suitable to accommodate the remaining need, and proceed using the same method specified in subsections (a) and (b) of this section until the land need is accommodated.
 - d) Notwithstanding subsection (a) through (c) of this section, a local government may consider land of lower priority as specified in ORS 197.298(3).

The boundary location factors of Goal 14 (Urbanization) are as follows:

- 1) *Efficient accommodation of identified land needs;*
- 2) *Orderly and economic provision of public facilities and services;*
- 3) *Comparative environmental, energy, economic and social consequences; and*
- 4) *Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB.*

The location criteria in Goal 14 require a comparative evaluation of potential UGB expansion areas that can reasonably be expected to meet identified needs. The City of Banks has identified a need to expand and amend its UGB to provide additional lands to meet the estimated demand for approximately 154 new acres of buildable residential land and 94 new acres of buildable economic land in the 20-year planning horizon (2009-2029). In totality, the City of Banks will need to expand its UGB to include approximately 248 additional acres.

Tables 1 and 2 summarize these land need estimates.

TABLE 1
Summary of Residential Land Need 2009-2029

Type	Acres Needed in Planning Period
Low Density Single Family (LDSF)	45.70
Single Family (R5)	45.60
High Density Single Family (HDSF)	20.70
Multifamily (R2.5)	4.90
High Density Multifamily (HDMF)	1.90
Mixed Use (MU)	4.90
<i>Subtotal of Residential Land</i>	<i>123.70</i>
25% for Parks, Schools, and Transportation Facilities	30.93
Total Estimated Acres of Residential Land Needed	154.63

Note: Some of these residential land use classifications are not yet included in the City of Banks Development Ordinance.

TABLE 2
Summary of Economic Land Need 2009-2029

Type	Acres Needed in Planning Period
General Commercial (C)	11.24
General Industrial (I)	76.39
<i>Subtotal of Economic Land</i>	<i>87.63</i>
Transportation Facilities	5.92
Total Estimated Acres of Economic Land Needed	93.55

ORS 197.298 Priority Areas for UGB Expansion

The location criteria in Goal 14 require a comparative evaluation of potential UGB expansion areas that can reasonably be expected to meet identified needs. In determining which lands to consider generally for UGB expansion, State statute provides a specific list of priorities that cities must follow. This list is found in ORS 197.298(1):

- (1) In addition to any requirements established by rule addressing urbanization, land may not be included within an urban growth boundary except under the following priorities:
 - a) First priority is land that is designated urban reserve land under ORS 195.145, rule or metropolitan service district action plan.

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- b) If land under paragraph (a) of this subsection is inadequate to accommodate the amount of land needed, second priority is land adjacent to an urban growth boundary that is identified in an acknowledged comprehensive plan as an exception area or nonresource land. Second priority may include resource land that is completely surrounded by exception areas unless such resource land is high-value farmland as described in ORS 215.710.
 - c) If land under paragraphs (a) and (b) of this subsection is inadequate to accommodate the amount of land needed, third priority is land designated as marginal land pursuant to ORS 197.247.
 - d) If land under paragraphs (a) to (c) of this subsection is inadequate to accommodate the amount of land needed, fourth priority is land designated in an acknowledged comprehensive plan for agriculture, forestry, or both.
- (2) Higher priority shall be given to land of lower capability as measured by the capability classification system or by cubic foot site class, whichever is more appropriate for the current use.

Response: The Banks study area has no land that has been designated urban reserve under ORS 195.145, rule, or metropolitan service district action plan. The Banks study area also has no land designated by Washington County as marginal land, pursuant to ORS 197.247.

There are approximately 61 acres of land designated as exception area (Priority 2) by Washington County. This includes approximately 2 acres of land zoned commercial by the County (per the Washington County Comprehensive Plan, exception areas have been established for lands designated for rural development with the "R-COM" land use designation). The remaining lands inside the study area are designated as resource areas (Priority 4) by Washington County. The Priority 4 lands are designated by Washington County as Exclusive Farm Use (EFU). Figure 2, provided at the end of this memorandum, shows parcels within the study area that are designated as Priority 2 exception areas and Priority 4 resource areas.

Regarding ORS 197.298(2), Figure 3 shows the soil capability class designations² of resource lands in the study area. Figure 3 is provided at the end of this memorandum.

OAR 660-033-0020(8)(a) defines "high value farmland":

- (8)(a) "High-Value Farmland" means land in a tract composed predominantly of soils that are:
 - (A) Irrigated and classified prime, unique, Class I or II; or
 - (B) Not irrigated and classified prime, unique, Class I or II.

OAR 660-033-0020(8)(c) is also applicable to Banks and defines further soils as "high value farmland":

- (c) In addition to that land described in subsection (a) of this section, high-value farmland, if in the Willamette Valley, includes tracts composed predominantly of the following soils in Class III or IV or composed predominantly of a combination of the soils described in subsection (a) of this section and the following soils:
 - (A) Subclassification IIIe, specifically, Bellpine, Bornstedt, Burlington, Briedwell, Carlton, Cascade, Chehalem, Cornelius Variant, Cornelius and Kinton, Helvetia,

² National Resources Conservation Service (NRCS) Soil Capability Classifications:
<http://soils.usda.gov/technical/classification/>

Hillsboro, Hult, Jory, Kinton, Latourell, Laurelwood, Melbourne, Multnomah, Nekia, Powell, Price, Quatama, Salkum, Santiam, Saum, Sawtell, Silverton, Veneta, Willakenzie, Woodburn and Yamhill;

- (B) Subclassification IIIw, specifically, Concord, Conser, Cornelius, Variant, Dayton (thick surface) and Sifton (occasionally flooded);
- (C) Subclassification IVe, specifically, Bellpine Silty Clay Loam, Carlton, Cornelius, Jory, Kinton, Latourell, Laurelwood, Powell, Quatama, Springwater, Willakenzie and Yamhill; and
- (D) Subclassification IVw, specifically, Awbrig, Bashaw, Courtney, Dayton, Natroy, Noti and Whiteson.

A GIS query of the National Resources Conservation Services (NRCS) database indicates the following Class III and IV “high value farmland” soil types are present in the Banks study area: Cascade; Cornelius; Multnomah; Quatama and; Saum. Figure 4 shows high value farmland in the study area (high value farmland being a combination of Class I, Class II, and the Class III and Class IV soil types noted above). Figure 4 is provided at the end of this memorandum.

Because the acreage required for UGB expansion exceeds the amount of land within the study area designated as Priorities 1-3, expansion of the Banks UGB will require inclusion of parcels currently designated EFU (Priority 4) by Washington County.

Assessment to Satisfy Industrial Land Needs

The Banks EOA identified a need to add approximately 80 acres of industrial land to the expanded UGB (80 acres is derived from the 76.39 identified on Table 2 of this memorandum, plus approximately 3.5 acres for associated transportation facilities). The Banks EOA did not specify any targeted industries or any specific industrial site needs.

As noted earlier in this memo, there is no Priority 1 land in the Banks UGB study area. There are approximately 61 acres of land designated as exception area in the UGB study area. Among this overall exception land in the UGB study area, there are three contiguous areas containing exception land. The largest of these three contiguous areas of exception land is located in the corridor north of Wilkesboro Road (south of OR 6). A second area of contiguous exception land is located immediately north of OR 6 (east of the current city boundary). A third area of contiguous exception land is located along the east side of Sellers Road (north of the current city boundary).

The entire contiguous area of exception land south of OR 6 was slated for inclusion into the expanded UGB as industrial land. Also slated for inclusion into the expanded UGB as industrial land: the small exception taxlot located in the triangle between Cedar Canyon Road and Sellers Road, and; the taxlot located in the triangle of land between OR 47 and Sellers Road (immediately north of the OR 47/Sellers Road/Banks Road intersection).

The contiguous exception taxlots located to the east of Sellers Road were **not** brought in as industrial land because this area is steeply graded and would not be conducive to development for industrial purposes. It was therefore decided to defer this exception land

for inclusion into the expanded UGB as residential land (this land currently has single-family residences on it).

The contiguous area of exception taxlots located north of OR 6 (east of the city boundary) was also not brought in as industrial, but rather was also deferred for inclusion into the expanded UGB as residential land. The rationale for this decision was based on the proximity of these taxlots to the Quail Valley Golf Course – it was determined that it would not be logical to place industrial tenants on the fringe of the golf course, while it would be perfectly reasonable to bring these taxlots into the expanded UGB as residential.

After bringing in the aforementioned of exception land as industrial (which totaled approximately 49 acres, there remained a need for approximately 31 acres more industrial land to satisfy total need identified in the EOA.

Proposed UGB expansion industrial land was next allocated to the predominantly low-value farmland area (see Figure 4) located directly east of the existing UGB on four taxlots located immediately south of Banks Road (see Figure 6, “Alternative 1”, located at the end of this memorandum). After the inclusion of these four taxlots, the small remainder of needed industrial land was satisfied by including two small taxlots located in the triangle of land between Cedar Canyon Road and OR 47. With the allocation of this industrial land, the City’s identified need for industrial land was complete.

Priority Exceptions

There was a consideration of whether it was necessary, per state law, to bring in the aforementioned exception lands. This subsection discusses this consideration.

In addition to establishing the priority of land to be included in an UGB, ORS 197.298 contains the following exception:

- (3) Land of lower priority under subsection (1) of this section may be included in an urban growth boundary if land of higher priority is found to be inadequate to accommodate the amount of land estimated in subsection (1) of this section for one or more of the following reasons:
 - a) Specific types of identified land needs cannot be reasonably accommodated on higher priority lands;
 - b) Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or
 - c) Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.

Response: The City of Banks must include existing exception lands (totaling approximately 60 acres) located in the study area pursuant to ORS 197.298(3). This finding is based on the below discussion.

ORS 197.298(3) subsections (a) and (c) are not applicable to the City of Banks UGB expansion. Regarding subsection (a), the City does not have any expansion land needs identified in either its Residential Land Needs Analysis or EOA that cannot be accommodated on available exception lands. Subsection (c) is not relevant in the Banks study area.

Regarding subsection (b), an assessment of available information regarding sewer, stormwater, and water utilities, in conjunction with consultation done with Clean Water Services³, indicates that these urban services can reasonably be provided to all exception area land in the study area at a comparatively similar cost. Additionally, all exception area land in the study area can be accommodated by the existing transportation (roadway) network.

Assessment to Satisfy Commercial Land Needs

The Banks EOA identified a need to add approximately 13 acres of commercial land to the expanded UGB (13 acres is derived from the 11.24 identified on Table 2 of this memorandum, plus approximately 1.5 acres for associated transportation facilities). The Banks EOA did not specify any targeted commercial uses or any specific commercial site needs.

Upon consideration of bringing in the needed commercial land, all exception land in the UGB study area had already been allocated; either for industrial or residential use (see earlier discussion under “Assessment to Satisfy Industrial Needs”).

After taking into account the UGB expansion study area taxlots already slated for industrial use, the remaining adjacent taxlots containing low-value farmland were considered for allocation as commercial land, but were deferred for allocation as residential. In the interest of providing commercial land that would promote compact growth, be located in a visible spot from a marketing sense, and be logical in relation to the existing transportation system, all of the identified commercial need was allocated to the taxlot located immediately west of Main Street (to the immediate northwest of the OR 6/OR 47 interchange). This central city location would also allow for potential “Main Street”-type commercial development (i.e. storefront on lot line at Main Street) with easy pedestrian and bicycle access from all parts of the city.

Assessment to Satisfy Residential Land Needs

The Banks Residential Land Needs Analysis identified a need to add approximately 154 acres of residential land to the expanded UGB (including approximately 31 acres for parks, schools, and associated transportation facilities – see Table 1 of this memorandum).

As noted in the assessment of industrial land needs, it was determined that approximately 5 acres of exception land east of the Sellers Road and approximately 8 acres of exception land north of OR 6 would be brought into the expanded UGB as residential land (in total, approximately 13 acres of exception land would be brought into the expanded UGB as residential). With this allocation, all exception land in the Banks UGB study area was slated for inclusion into the expanded Banks UGB.

Next, all taxlots adjacent to the existing UGB containing low-value farmlands were slated for inclusion into the UGB as residential. This allocation included four parcels located

³ City of Banks Water Master Plan (DRAFT), Kennedy/Jenks Consultants, November 2008; Sanitary System Master Plan (DRAFT), Clean Water Services, March 2009. Excerpts related to Banks provided to CH2M HILL by Andy Braun, Clean Water Services on April 21, 2009; conversations with Andy Braun, Clean Water Services regarding stormwater and sewer facility expansion to exception areas in Banks Study Area on April 16, 2009

directly east of the existing Banks city boundary and a large taxlot located southwest of the city (directly west of OR 47 and north of Dierckx Road). This allocation also entailed a partial inclusion of the taxlot north of Banks Road, located northeast of the city (this partial taxlot land contains low-value farmland).

After allocating the available low-quality farmland in the UGB study area, the Goal 14 location factors were utilized to arrive at a recommended UGB expansion strategy for Banks.

An overall consideration of the Goal 14 UGB boundary location factors for the Banks UGB expansion is provided below.

Boundary Location Factors Assessment

OAR 660-024-0060(1) requires that the boundary location factors of Goal 14 be applied to potential UGB expansion areas subsequent to the prioritization of land in the UGB expansion study area per ORS 197.298.

1. Efficient accommodation of identified land needs

As noted earlier, as it relates to relevant statutes, the City of Banks does not have site-specific identified land needs (based on the Residential Land Needs Analysis and EOA). However, the City does need to include approximately 248 acres of **buildable** land into its expanded UGB for residential, industrial, and commercial land needs. None of these categories of land development would reasonably be expected to be accommodated in FEMA 100-year floodplain areas due to the high costs associated with such development. Therefore, notwithstanding Priority 2 exception lands, it is recommended that the expanded Banks UGB **not** include lands fully inside floodplain areas for residential, industrial, or commercial uses. The Federal Insurance Rate Map (FIRM) for the Banks study area, which identifies the presence of 100-year floodplain, is provided as Figure 5, located at the end of this memorandum.

2. Orderly and economic provision of public facilities and services

This location factor favors the inclusion of lands that are estimated to have relatively lower combined costs of public infrastructure (e.g. transportation; sewer; water) for the respective development of residential and economic (industrial, commercial) uses. Based on this location factor, the consideration of areas to be included into the expanded UGB is being done in accordance with the subsections of OAR 660-024-0060(8):

- a) The impacts to existing water, sanitary sewer, storm water, and transportation facilities that serve nearby areas already inside the UGB;
- b) The capacity of existing public facilities and services to serve areas already inside the UGB as well as areas proposed for addition to the UGB; and
- c) The need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements on existing roadways

The consideration of OAR 660-024-0060(8) is provided in response to the UGB expansion alternatives presented later in this memorandum and is based on available information regarding Banks' existing and future public infrastructure.

3. Comparative environmental, energy, economic and social consequences

This location factor favors the inclusion of new lands that:

- Do not impact designated or protected environmental resources (e.g. Goal 5 resources)
- Reduce projected fossil fuel energy use (e.g. reduction in vehicle miles traveled)
- Provide impetus for economic growth
- Promote the social well-being of the Banks community and its residents

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

For the Banks UGB expansion, this location factor favors the inclusion of new land uses that will not be in conflict with existing surrounding farm uses.

Based on the results of the described assessment of industrial, commercial, and residential parcels in the Banks UGB Study Area, a ‘first-cut’ UGB expansion strategy (figure and accompanying rationale) was created and presented by consultant staff at a joint meeting of the Banks Planning Commission and City Council on May 14, 2009, for the purpose of receiving comments and concerns from local officials (this ‘first-cut’ strategy, with slight modifications, would become Alternative 1).

A description of the aforementioned UGB expansion strategy, per the UGB location factors, is described in Table 3.

TABLE 3: FIRST-CUT UGB EXPANSION STRATEGY

1. Efficient accommodation of identified land needs	The UGB expansion area strategy is well-suited to provide for efficient accommodation of a variety of residential, industrial, and commercial needs.
	Due to the compact nature of the UGB expansion, future commercial and industrial uses in the expanded UGB will also serve existing neighborhoods located nearby within the current UGB. Similarly, residents of new neighborhoods would have convenient access to existing commercial stores.
	Residential neighborhoods in the expansion area east of the railroad will have convenient access to the Banks School complex (elementary/middle/high school), assuming a bicycle/pedestrian connection traversing the railroad.
	An employment area is proposed immediately south of Highway 6 with easy access to existing entrance and exit ramps. This designation promotes the efficient use of this vital transportation facility.
	Efficient accommodation of identified land needs will also be achieved by facilitating future construction of recommended projects to be listed in the pending City of Banks Water Master Plan and the Clean Water Service Sewer and Stormwater Plans.
2. Orderly and economic provision of public services	Public services will be provided to all expansion areas in accordance with the pending transportation, water, sewer, and stormwater master plans being prepared for the City of Banks. Parks facilities will be provided in the expansion areas consistent with the pending City of Banks Parks Master Plan (Draft-pending), and public school facilities will be provided as outlined in the Banks

	School District Facilities Planning Commission Final Report (2008).
	The residential expansion area to the east of the current UGB includes a proposed “South Banks secondary access” that would connect from the Banks Estates/ Arbor Village area on the west side of the railroad line to the east side of the railroad line at NW Rose Avenue. ⁴
	The residential expansion area to the north of the current UGB includes the proposed realignment of Sellers Road and reconfiguration of the Sellers Road/Banks Road/Main Street intersection. ⁵
	The residential area to the southwest of the current UGB will spread future traffic more evenly in the Banks area, especially in regard to main Street (Highway 47), thereby mitigating vehicular overreliance on Main Street north of Highway 6.
	The industrial expansion area southeast of the current UGB will include the proposed upgrading of Wilkesboro Road.
2. Comparative environmental, energy, economic, and social consequences	
<i>Environmental</i>	The UGB expansion lands contain no designated Goal 5 resources other than a small area of wetlands located to the southeast of the city and floodplain areas located on one parcel to be brought in west of the current UGB. Two exception land parcels have a part of this wetland area, however, both of these parcels have enough non-wetland area available that either are viable candidates for development without the need to disturb the existing wetlands. Concurrent with the UGB expansion adoption, the City of Banks will be adopting floodplain protection language into its Code, which will prohibit the development of any structures in the floodplain, while allowing floodplain-friendly community asset development such as ball fields, trails, etc.
	By bringing in all available exception lands in the study area, this UGB expansion strategy minimizes the need to bring in agricultural land.
	The UGB expansion strategy removed from consideration all parcels that were entirely located within the 100-year floodplain.
<i>Energy</i>	The majority of the UGB expansion lands abut or are in the immediate vicinity of the existing urban area, allowing for easy access to existing commercial and employment centers.
	The proposed mix of residential, employment, and commercial land uses within the expansion area will provide opportunities for combining vehicle trips and reducing vehicle miles traveled.
	The UGB expansion areas are relatively flat, providing good opportunities for both passive and active solar energy use.
<i>Economic</i>	Future industrial-type activity on the UGB expansion lands located immediately east of the Banks Lumber property will contribute to the viability of this area for small-to-medium sized industrial uses.

⁴ Banks Transportation Network Plan (1999)

⁵ Banks Transportation Network Plan (1999)

	<p>The UGB expansion area southeast of the existing UGB has excellent access to Highway 6 as an appealing size range of existing legal taxlots that would be attractive for small-to-medium sized industrial uses.</p>
	<p>The UGB expansion lands northwest of the Highway 6 entrance/exit road will allow for Main Street commercial store frontage.</p>
	<p>Future commercial and employment uses in the UGB expansion areas will also serve residents in new neighborhoods within the UGB expansion area.</p>
	<p>The UGB expansion lands northwest of the Highway 6 entrance/exit road will allow for Main Street commercial store frontage.</p>
<i>Social</i>	<p>Residential neighborhoods in the UGB expansion area east of the railroad will have convenient access (within bicycling/walking distance) to the Banks school complex (elementary, middle, high).</p>
	<p>The UGB expansion lands west, east, and north of the current UGB will provide new residents within easy bicycle/pedestrian distance to the Banks-Vernonia Trail.</p>
	<p>The size and configuration of the UGB expansion area allows for a mix of residential, commercial, and employment uses. Availability of existing and planned school and recreational facilities will encourage the creation of “complete neighborhoods,” where daily needs of residents can be met with less need for travel and a high degree of convenience.</p>
	<p>The UGB expansion strategy allows for ample opportunities to plan residential, commercial, and industrial developments that will not be in conflict with one another.</p>
4. Compatibility of proposed urban uses with nearby agricultural and forest activities occurring on farm and forest outside the UGB	<p>Where the expanded UGB abuts agricultural uses, this land will be zoned for larger-lot residential development. This may be the case along the western boundary of the UGB expansion area located to the southwest of the current UGB and along the northern boundary of the UGB expansion area northeast of the current UGB (north of Banks Road).</p>

UGB Expansion Alternatives

Comments on the first-cut UGB strategy were compiled from Planning Commission and City Council members at the May 11 meeting and in the days following the meeting.

In response to comments received, four UGB expansion alternatives were developed and assessed in accordance with the UGB location factors. The four alternative figures, along with an accompanying description of each alternative, were delivered to City of Banks staff

(as noted, Alternative 1 was a slightly modified version of the first-cut strategy presented at the May 11 meeting). The four alternatives are depicted in Figures 6 through 9, located at the end of this memorandum.

All alternatives presented include OR 6 and OR 47 right of way and the OR6/OR 47 interchange area. Because these are existing transportation facilities serving existing UGB land, the area they occupy are not counted against the Banks total land need amount.

Banks staff presented the four alternatives to the Banks Planning Commission on May 28, 2009. It was noted to Banks staff by the consultant analyst that Alternatives 1, 2, and 3 were comparatively similar in respect to the UGB location factors (Alternative 4, which was explicitly created in response to a request from the City, did not appear to adequately address the City's stated residential need). The Planning Commission voted for "Alternative 2" with some modifications as the "preferred alternative".

Banks staff presented the four UGB expansion alternatives and Planning Commission-preferred alternative to the Banks City Council May 29, 2009. The City Council approved the Planning Commission preferred alternative recommendation (Alternative 2 with modifications).

Preferred Alternative for UGB Expansion

The Banks City Council-proposed Preferred Alternative is shown on Figure 10. Consultant staff conducted an assessment of this alternative (Alternative 2 with modifications) and it was found that the preferred alternative UGB expansion strategy was comparatively equal-or-superior to the other alternatives that were developed in respect to the UGB location factors.

A table containing taxlots that would either be fully or partially included in the preferred alternative expanded UGB is provided as Table A-1 in Appendix A, located at the end of this memorandum. Figure A-1, also included in Appendix A, depicts taxlot identification numbers, and serves as a reference for Table A-1.

Overall, the proposed preferred alternative UGB expansion strategy emphasizes compact urban growth through the inclusion of abutting and closely adjacent lands and preservation of surrounding agricultural lands through the inclusion of all exception land in the study area and the deliberate inclusion of non-high value farmland and land already developed for uses other than farming.

The rationale for the allocation of new UGB land onto partial taxlots is discussed below (see Figure A-1 for taxlot identification number map):

- Taxlot 2N4360001101: this taxlot is located immediately northwest of the OR 6/OR 47 interchange. The rationale for the partial inclusion of this taxlot was discussed earlier in this memorandum in the "Assessment of Commercial Lands" section.
- Taxlot 2N4360000600: this taxlot abuts the western edge of the current Banks UGB. The proposal is to bring in 40 acres from this taxlot – 28 acres of which are outside the floodplain and would be brought in to the expanded UGB as buildable residential land, 12 acres of which are in the floodplain fringe and would be brought in as residential

land, but with the intent to be utilized for floodplain-friendly community purposes (ball fields, recreation trails).

This partial taxlot inclusion was done to bring in land for residential use directly adjacent to the city, while excluding the majority of the floodplain land existing on the taxlot, including the entirety of the floodway. Bringing this land into the UGB allows for compact growth outward from the city's existing UGB. Future residents would be within easy walking and bicycling distance to Main Street, Sunset Park (located directly to the south of this taxlot) and the Banks elementary-middle-high school complex (which is located off Trellis Way, in the central part of the city).

- Taxlot 2N331CA06900: this taxlot is located east of the city and part of the taxlot is in current use by the Quail Valley Golf Course. The intent of this partial taxlot inclusion is for a future north-south connector road on the east side of the existing city that would serve several of the new residential taxlots proposed for inclusion into the expanded UGB. The remainder of the taxlot (aside from that proposed for inclusion to accommodate the new roadway) was not brought in because it is in active use by the golf course.
- Taxlots 2N3310000201 and 2N331D000100: both of these taxlots, located east of the current city boundary, are owned by Quail Valley Golf Course. The land on these two lots, although technically categorized as high-value farmland due to their underlying soils (see Figure 4), were removed from farm use when the golf course was developed, subsequent to Washington County development approval, in 1993. Therefore, because this land is no longer in agricultural use, bringing this land in further relieves the need to bring in high-value farmland that is currently being farmed. The configuration of the partial taxlots reflects the desire to bring in this non-farmed land while leaving out the areas of the taxlots being actively used as golf course (as part of the golf course that is played). Quail Valley has approached the City as a willing developer of its land in the event of UGB expansion, and the configuration of the land proposed for inclusion into the expanded UGB reflects their development preferences. The City is amenable to these preferences.
- Taxlot 2N331000404: this taxlot is located just north of the Quail Valley Golf Course. This partial lot inclusion brings in eight acres of low-value farmland. The intent of this inclusion is to avoid bringing in high-value farmland elsewhere while simultaneously providing further residential land surrounding the golf course.

The rationale for the preferred alternative, per the UGB location factors, is discussed in Table 4.

TABLE 4: PREFERRED ALTERNATIVE RATIONALE

1. Efficient accommodation of identified land needs	The UGB expansion area strategy is well suited to provide for efficient accommodation of a variety of residential, industrial, and commercial needs.
	Due to the compact nature of the UGB expansion, future commercial and industrial uses in the expanded UGB will also serve existing neighborhoods located nearby within the current UGB. Similarly, residents of new neighborhoods would have convenient access to existing commercial stores.
	Residential neighborhoods in the expansion area east of the railroad will have convenient access to the Banks School complex (elementary/middle/high school), assuming a bicycle/pedestrian connection traversing the railroad.
	An employment area is proposed immediately south of Highway 6 with easy access to existing entrance and exit ramps. This designation promotes the efficient use of this vital transportation facility.
	Efficient accommodation of identified land needs will also be achieved by facilitating future construction of recommended projects to be listed in the pending City of Banks Water Master Plan and the Clean Water Service Sewer and Stormwater Plans.
2. Orderly and economic provision of public services	Public services will be provided to all expansion areas in accordance with the pending transportation, water, sewer, and stormwater master plans being prepared for the City of Banks. Parks facilities will be provided in the expansion areas consistent with the pending City of Banks Parks Master Plan (Draft- pending), and public school facilities will be provided as outlined in the Banks School District Facilities Planning Commission Final Report (2008).
	The residential expansion area to the east of the current UGB includes a proposed “South Banks secondary access” that would connect from the Banks Estates/Arbor Village area on the west side of the railroad line to the east side of the railroad line at NW Rose Avenue. ⁶
	The residential expansion area to the north of the current UGB includes the proposed realignment of Sellers Road and reconfiguration of the Sellers Road/Banks Road/Main Street intersection. ⁷
	The industrial expansion area southeast of the current UGB will include the proposed upgrading of Wilkesboro Road.
3. Comparative environmental, energy, economic, and social consequences	
<i>Environmental</i>	The UGB expansion lands contain no designated Goal 5 resources other than a small area of wetlands located to the southeast of the city and floodplain areas located on one parcel to be brought in west of the current UGB (this land is intended for ‘floodplain-friendly’ community facility development (e.g. ball fields, recreation trails). Two exception land parcels have a part of this wetland area, however, both of these parcels have enough non-wetland area available that either are viable candidates for development without the need to disturb the existing wetlands. Concurrent with the UGB expansion adoption, the City of Banks will be adopting floodplain protection language into its Code, which will prohibit the development of any structures in the floodplain, while allowing floodplain-friendly community asset development such as ball fields, trails, etc.

⁶ Banks Transportation Network Plan (1999)

⁷ Banks Transportation Network Plan (1999)

	<p>By bringing in all available exception lands in the study area, this UGB expansion strategy minimizes the need to bring in agricultural land.</p> <hr/> <p>Regarding the resource land being proposed for inclusion into the expanded UGB, the preferred alternative intentionally targeted non-high value farmland and previously developed land designated as high-value farmland (as in the case of the inclusion of land inside the golf club area).</p> <hr/> <p>The preferred alternative strategy avoided bringing in the potentially sensitive hillside lands northeast of the city.</p> <hr/> <p>The UGB expansion strategy removed from consideration all parcels that were entirely located within the 100-year floodplain.</p>
<i>Energy</i>	<p>The majority of the UGB expansion lands abut or are in the immediate vicinity of the existing urban area, allowing for easy access to existing commercial and employment centers.</p> <hr/> <p>The proposed mix of residential, employment, and commercial land uses within the expansion area will provide opportunities for combining vehicle trips and reducing vehicle miles traveled.</p> <hr/> <p>The UGB expansion areas are relatively flat, providing good opportunities for both passive and active solar energy use.</p>
<i>Economic</i>	<p>Future industrial-type activity on the UGB expansion land located immediately east of the Banks Lumber property will contribute to the viability of this area for small-to-medium sized industrial uses.</p> <hr/> <p>The UGB expansion area southeast of the existing UGB has excellent access to Highway 6 and an appealing size range of existing tax lots that would be attractive for small-to-medium sized industrial uses.</p> <hr/> <p>The UGB expansion lands northwest of the Highway 6 entrance/exit road intersection will allow for Main Street commercial store frontage.</p> <hr/> <p>Future commercial and employment uses in the UGB expansion areas will also serve residents in new neighborhoods within the UGB expansion area.</p>
<i>Social</i>	<p>Residential neighborhoods in the UGB expansion area east of the railroad will have convenient access (within bicycling/walking distance) to the Banks school complex (elementary, middle, high).</p> <hr/> <p>The UGB expansion lands west, east, and north of the current UGB will provide new residents easy bicycle/pedestrian distance to the Banks-Vernonia Trail.</p> <hr/> <p>The size and configuration of the UGB expansion area allows for a mix of residential, commercial, and employment uses. Availability of existing and planned school and recreational facilities will encourage the creation of “complete neighborhoods,” where daily needs of residents can be met with less need for travel and a high degree of convenience.</p> <hr/> <p>The UGB expansion strategy allows for ample opportunities to plan residential, commercial, and industrial developments that will not be in conflict with one another.</p>
4. Compatibility of proposed urban uses with nearby agricultural and forest activities occurring outside the UGB	<p>As noted earlier, the preferred alternative prioritized non-high value farmland for inclusion in the expanded UGB. Additionally, the majority of the expansion lands do not directly abut working farmland. Where the expanded UGB does abut agricultural uses, this land will be either be zoned for larger-lot residential development or include a green buffer between development and the nearby farm practice. This can be easily accomplished in all of the instances where abutment does occur.</p>

The Banks Planning Commission/City Council preferred alternative was forwarded for review by DLCD, ODOT, and Washington County. Based on comments received by ODOT, it was determined that it would not be feasible to bring in the parcel located in the southwest quadrant of the OR 6/OR 47 interchange due to vehicular access issues. ODOT noted that it would not allow a vehicular access to this parcel because it is located directly across from an interchange ramp terminal. Moreover, ODOT noted that it would require the existing Wilkesboro Road access to OR 47 be relocated to provide greater access spacing between the interchange ramp terminal and the nearest access to OR 47.

In response to the above concerns, a further modification to the proposed preferred alternative was identified by consultant staff in coordination with ODOT to reallocate the industrial land previously slated for Taxlot 2N4360001300 (approximately 19 acres). This modification, shown on Figure 11, was delivered to Banks staff on June 16. Banks staff has indicated that this proposed modification to the preferred alternative will need to be officially considered by both the Banks Planning Commission and Banks City Council.

If the Banks Planning Commission and Banks City Council approves this modification to the preferred alternative, an amendment to this memo will be performed to update the preferred alternative figure (Figure 10) and taxlots table (Table A-1) to reflect the modification.

The Banks Planning Commission/City Council preferred alternative was presented to the general public for the first time at a community meeting held June 18, 2009. Public comments will be considered by both the Planning Commission and City Council as it moves forward with the UGB expansion process.

Figures

Figure 1: UGB Study Area

Figure 2: Priority Land Designations

Figure 3: Soil Capability Classes

Figure 4: High Value Farmland

Figure 5: FEMA Flood Insurance Rate Map

Figure 6: Alternative 1

Figure 7: Alternative 2

Figure 8: Alternative 3

Figure 9: Alternative 4

Figure 10: Preferred Alternative

Figure 11: Proposed Reallocation/Modification to Preferred Alternative

Appendixes

Appendix A:

Table A-1: Preferred Alternative - Tax Lots Inventory

Figure A-1: Preferred Alternative Tax Lots

Figure A-1 Inset #1

Figure A-1 Inset #2

Figures

Appendix A
