



MEMORANDUM

TO: Planning Commission

FROM: Kate McQuillan, Senior Planner
Elena Sasin, Associate Planner
Lina Smith, Associate Planner

DATE: September 21, 2022

SUBJECT: Additional Goal 12 Findings Supplemental Memorandum for CPA2022-0006 and ZMA2022-0006

This memorandum provides additional staff findings for CPA2022-0006 and ZMA2022-0006, the Discretionary Annexation-Related Comprehensive Plan and Zoning Map Amendments for the Panzer site consisting of eight parcels at 1065 SW 181st Avenue and 17940 – 18110 W Baseline Road (Tax Lots 3600, 3700, 3702, 3800, 3900, 4000, 4100, and 4200 on Washington County Tax Assessor’s Map 1S106BC).

Oregon Revised Statutes (ORS) 197.175(1) requires cities to exercise their planning responsibilities consistent with Statewide Planning Goals and ORS Chapters 195, 196, and 197. This memorandum provides staff findings necessary to demonstrate consistency with statewide planning Goal 12, Transportation.

Goal 12 - Transportation

Findings: OAR (Oregon Administrative Rules) 660-012-000 through 660-012-0070, referred to as the Transportation Planning Rule¹ (TPR), provide guidance on compliance with Statewide Planning Goal 12. A Transportation System Plan (TSP), adopted pursuant to OAR Division 12, fulfills the requirements for public facilities planning required under ORS 197.712(2)(e), Goal 11 and OAR Chapter 660, Division 12 as they relate to transportation facilities. Volume IV of the Comprehensive Plan contains the City’s adopted TSP, effective October 21, 2010.

Significant Effects

The TPR states that “if an amendment to a functional plan, an acknowledged comprehensive plan, or a land use regulation (including a zoning map) would significantly affect an existing or planned transportation facility, then the local government must put in place measures as provided in section (2) of this rule.”

“A plan or land use regulation significantly affects a transportation facility if it would:

¹ The Transportation Planning Rule requires local governments to review Comprehensive Plan and land use regulation amendments and contains standards by which to review the effect of the proposed amendment on existing or planned transportation facilities.

- a) Change the functional classification of an existing or planned transportation facility (exclusive of correction of map errors in an adopted plan);
- b) Change standards implementing a functional classification system; or
- c) Result in ...
 - A. Types or levels of travel or access that are inconsistent with the functional classification of an existing or planned transportation facility;
 - B. Degrade the performance of an existing or planned transportation facility such that it would not meet the performance standards identified in the TSP or comprehensive plan; or
 - C. Degrade the performance of an existing or planned transportation facility that is otherwise projected to not meet the performance standards identified in the TSP or comprehensive plan.”

Potential Significant Effect

The proposed Comprehensive Plan and Zoning Map Amendments are not proposing to change the functional classification of an existing or planned street, nor is the proposal changing the City’s adopted street standards which implement street functional classifications. Therefore, subsections (a) and (b) above are not applicable.

Subsection (c)(C) is applicable. The site is adjacent to two arterials under the jurisdiction of Washington County – W Baseline Road and SW 185th Avenue. The Washington County 2020 Roadway System Needs Report indicates that the northern and western legs of this major intersection are projected to not meet the County’s adopted performance standards where the volume-to-capacity (v/c) ratio will exceed the maximum v/c of 1.0 standard. The findings below provide a high-level analysis of maximum densities and permitted land uses allowed under the proposed Station Community – Multiple Use District (SC-MU) which staff finds will further degrade the intersection of W Baseline Road and SW 185th Avenue.

Permitted Land Uses

The discretionary annexation-related zone change from Washington County Transit Oriented Residential District 18-24 units per acre (TO: R18-24) to City of Beaverton SC-MU would be applied to approximately 13.1 acres of the total Panzer site. The site is within one-quarter to one-half mile of the Willow Creek / 185th Avenue Max Light Rail platform. The site is also relatively flat without any environmental designations or overlays that would affect developable area.

The SC-MU zone would allow for a wider range of permitted uses with more intensive traffic impacts than the uses allowed under County zoning (see Table 1 below). Permitted uses under the existing County code are mostly residential but also include day care facilities, group care homes, religious institutions, public buildings, and limited recreational uses. Of these permitted non-residential uses, religious institutions and the limited recreational uses may not occupy a site larger than 7 acres, effectively prohibiting these uses on the subject site.

Table 1. Land uses permitted under SC-MU zoning but not permitted under TO:R18-24

Allowed¹	Allowed with limitations²
Hospitals Medical clinics Office Short term commercial parking (parking as principal use) Hotels	Theaters (commercial amusement) Retail Service businesses / professional services Vehicle rental

Car service stations Car wash Commercial schools Educational institutions Regional parks Community parks Manufacturing Research and development (laboratory)	
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¹ Bolded uses are most likely to be highest traffic generators

² Under Beaverton Development Code, these uses are limited to 10,000 square feet and/or a percentage of overall mixed-uses

Maximum Density

In addition to a greater variety of allowed land uses within the SC-MU zone, the maximum densities allowed are greater under the City’s SC-MU zoning (see Table 2 below). The maximum density under Washington County’s Community Development Code (Section 375, Table C. Density Requirements for Transit Oriented Districts) is 24 dwelling units per acre, and unlimited floor-area-ratio (or FAR). The maximum density under the City of Beaverton’s Development Code is unlimited residential units and a FAR of 1.0.

Table 2. Differences in maximum densities between TO:R18-24 and SC-MU

	County Zoning TO:R18-24	City Zoning SC-MU
Standard	Residential: Max. 24 units per acre Non-residential: No FAR (minimum 0.5)	Residential: None Non-residential: FAR 1.0

For the purposes of demonstrating compliance with Statewide Planning Goal 12, Transportation, city staff provide the following example of a “reasonable worst case scenario” under both the current zoning and the proposed SC-MU zoning:

Table 3. Reasonable Worst Case Scenarios for TO:R18-24 and SC-MU

	County Zoning TO:R18-24	City Zoning SC-MU
Max. density allowable for subject site¹	314 residential units	566,000 square feet of floor area
Reasonable Worst Case Scenario	314 residential units	Hospital (approximately 300,000 square feet) + medical clinics (150,000 square feet)

¹ Site is approximately 13.1 acres in size, or approximately 566,000 square feet

For the existing TO:R18-24 zone, both day care facilities and public buildings are permitted uses without the site acreage limitation that the other non-residential uses are subject to under Washington County Community Development Code Section 375. However, it is unlikely that a day care facility or public building could be feasibly constructed at such a scale that traffic impacts would be greater than the maximum allowed 314 residential units. Using the average daily trip rates in the 11th edition of the Institute of Transportation Engineers (ITE) Trip Generation Manual of 4.54 trips per unit, 314 residential units can be expected to generate approximately 1,426 trips.

For the SC-MU zone, a combination of hospital and medical clinics were used to develop a reasonable worst case scenario as these uses would be allowed under the proposed SC-MU zone without limitations to floor area, and are expected to draw the most traffic based on the 11th edition of the ITE Trip Generation Manual. Per the ITE Trip Generation Manual, hospitals generate 14.69 trips per 1,000 square feet of gross floor area. Assuming there is a hospital of approximately 3,000 square feet, the hospital would generate 4,400 trips to the site. Staff also assume the subject site's reasonable worst case scenario under the SC-MU zone would include adjacent medical clinics supporting the hospital use. The ITE Trip Generation Manual states that medical clinics generate 34.98 trips per 1,000 square feet. Thus, 150,000 square feet of medical clinics would bring approximately 5,247 trips to the site. Combined, the hospital and medical clinic campus on the roughly 13-acre site would add 9,654 trips to the site which is significantly more than the 1,426 trips projected from the reasonable worst case scenario under current County zoning.

Allowable Amendments with Significant Impacts

Subsection (3) of OAR 660-012-0060 allows for local jurisdictions to propose Comprehensive Plan or Zoning Map Amendments that are anticipated to further degrade a transportation facility that otherwise is expected to exceed performance standards provided that all the applicable subsections are met. Subsection (3) reads:

(3) Notwithstanding sections (1) and (2) of this rule, a local government may approve an amendment that would significantly affect an existing transportation facility without assuring that the allowed land uses are consistent with the function, capacity and performance standards of the facility where:

(a) In the absence of the amendment, planned transportation facilities, improvements and services as set forth in section (4) of this rule would not be adequate to achieve consistency with the identified function, capacity or performance standard for that facility by the end of the planning period identified in the adopted TSP;

(b) Development resulting from the amendment will, at a minimum, mitigate the impacts of the amendment in a manner that avoids further degradation to the performance of the facility by the time of the development through one or a combination of transportation improvements or measures;

(c) The amendment does not involve property located in an interchange area as defined in paragraph (4)(d)(C); and

(d) For affected state highways, ODOT provides a written statement that the proposed funding and timing for the identified mitigation improvements or measures are, at a minimum, sufficient to avoid further degradation to the performance of the affected state highway. However, if a local government provides the appropriate ODOT regional office with written notice of a proposed amendment in a manner that provides ODOT reasonable opportunity to submit a written statement into the record of the local government proceeding, and ODOT does not provide a written statement, then the local government may proceed with applying subsections (a) through (c) of this section.

As stated above, the County's 2020 Roadway System Needs Report states that the intersection of W Baseline Road and SW 185th Road are expected to experience significant congestion such that the performance measures cannot be met, even without the proposed Comprehensive Plan and Zoning Map Amendments. Given the increased density allowed and higher traffic generating land uses allowed under the proposed SC-MU zone, staff find that the proposed amendment will further degrade the known performance and congestion concerns documented in the County's report. Therefore (3)(a) is met.

Development resulting from the proposed Comprehensive Plan and Zoning Map Amendments will be subject to various transportation policies. Currently the Washington County TSP shows a future collector to be constructed through the full Panzer site. After the associated annexation of the Panzer site becomes final in 2023, the City will seek to add the future collector alignment to be codified in the appropriate City documents. It is anticipated that this will occur concurrently with a development proposal for the site. As such, future development will be required to construct this new collector street. The new collector alignment as currently shown in the County's TSP will help mitigate the expected traffic from future development as it would allow trips to access both W Baseline Road and SW 185th Avenue without entering the congestion intersection. Thus, staff find (3)(b) is met.

The subject site is not located near a defined interchange, nor does the subject site include any affected state highways. Therefore (3)(c) and (d) are met.

Summary

In summary, pursuant to OAR 660-012-0060 (3), staff find that while the proposed Comprehensive Plan and Zoning Map Amendments will add congestion to an intersection that is expected to not meet performance measures, the future planned collector as currently shown on Washington County's TSP and the City's appropriate transportation plans that will be required with future development will sufficiently mitigate the site's expected traffic to the surrounding transportation network.