



MEMO

Date: August 4, 2020
To: City of Grants Pass
CC: Steve Faust, 3J Consulting
From: Elizabeth Decker, JET Planning
Subject: Zoning Factors for UGB Rezoning Project

Overview. The purpose of this memo is to identify relevant Comprehensive Plan policies and zoning district standards that must be met when applying Grants Pass urban zoning districts to lands within the City's UGB as part of the UGB Rezoning project. Plan policies and zone standards should guide selection between the various implementing zones available within the existing Comprehensive Plan land use designations. Further, the proposed zoning districts must meet the approval criteria for zoning map amendments established in Section 4.033 of the Grants Pass Development Code.

Background. The UGB Rezoning project affects approximately 542 acres of land within the City's UGB but outside its current city limits, encompassing nearly all of the land within the UGB intended for future City development.¹ These properties currently have rural zoning under Josephine County's zoning regulations, but are eligible for rezoning to urban zones, even prior to annexation, under the terms of a 1998 Intergovernmental Agreement between the City and County to support efficient development of UGB area. Per ORS 197.174(2)(b) and 227.175(4)(a), zoning districts must implement the comprehensive plan designations for these properties to be consistent with the adopted land use vision for these areas and the city's overall growth.

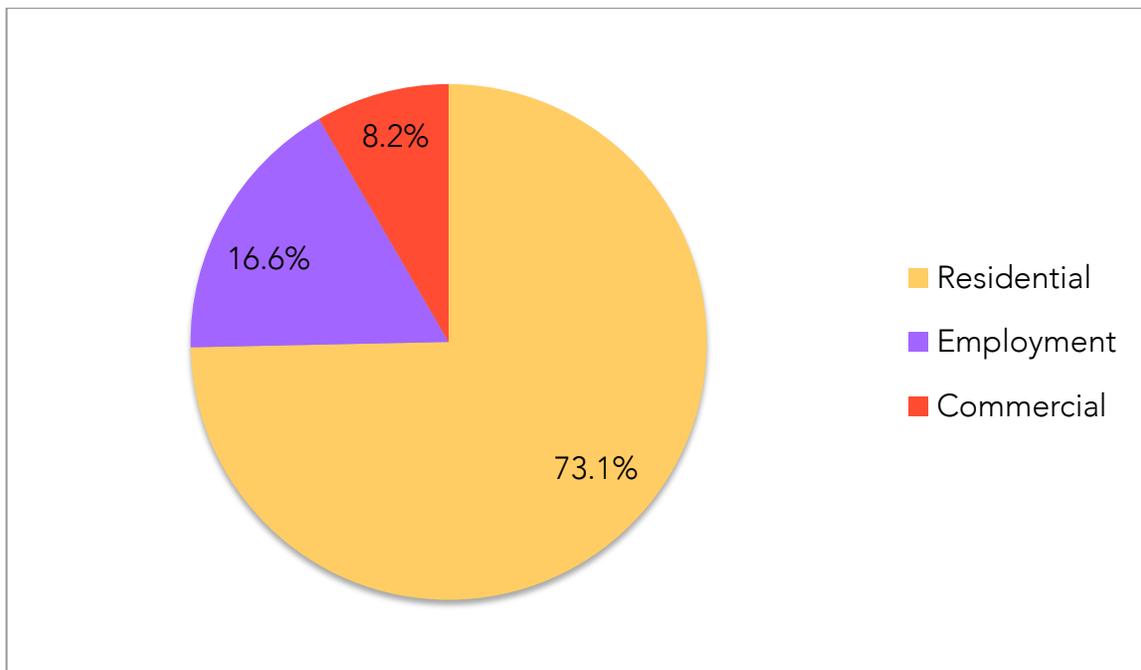
¹ There is one area within the UGB but outside City limits that is not proposed for rezoning with this project. The approximately 132-acre area north of I-5 at Scoville Road and extending north along Granite Hill Road is designated for future Employment uses. The City will conduct further analysis of its future employment needs before moving forward with any urban rezoning of this area.

The comprehensive plan designations for these properties include a full range of residential, commercial and employment designations. Residential designations range from low to high density. Total area by designations show that residential designations are the most prevalent, totaling 73.1% of the UGB area across the four residential designations, with Moderate Density Residential being the most common designation.

Table 1: Land Use Designations for UGB Rezone Area

Designation	Acres	% of Area
Low Density Residential	97.08	17.90%
Moderate Density Residential	213.09	39.28%
High Density Residential	12.87	2.37%
High Rise Density Residential	73.62	13.57%
Employment	87.99	16.22%
Business Park	2.09	0.39%
Commercial	55.69	10.27%
Total	542.43	

Figure 1: Land Use Designations by Category



The affected properties are located around the periphery of the existing city limits, generally grouped into five subareas.

North Grants Pass: Several areas along either side of the I-5 corridor that are entirely Employment designation with the exception of two Low Density Residential properties located on Vertical Drive.

West Grants Pass: Located north of Leonard Road, with a patchwork of Low and Moderate Density Residential, with Moderate Density Residential predominating.

Southwest AB Grants Pass: South of Hwy 199 (Redwood Highway) at Hubbard Lane, and between Willow Lane and Schutzwahl Lane that includes a patchwork of Commercial, Employment and High Rise Density Residential, with small amounts of Low and High Density Residential.

Southwest C Grants Pass: Along Allen Creek Road is predominately Medium Density Residential with some High and High Rise Density Residential in the northern portion, and a few Low Density Residential parcels on the southern edge.

Southeast Grants Pass: Along Cloverlawn Drive from Robertson Lane to Walker Road, this area includes exclusively Low and Moderate Density Residential, predominately Moderate Density Residential.

Rezone Approval Criteria

Before the City can adopt any type of rezoning, the UGB Rezoning project will need to clearly demonstrate how it meets the approval criteria for zoning map amendments found in Grants Pass Development Code 4.033. Many of these factors will be specific to the different land use designations and even to individual parcels within the 542 affected acres, as discussed in the following sections about residential, employment and commercial designated lands. Generally, the approval criteria and their relevance to guiding the application of the various zoning districts to implement the comprehensive plan land use designations include:

- (1) The proposed use, if any, is consistent with the proposed Zoning District.

No uses are proposed as part of the UGB Rezone Application; criterion is not relevant.

- (2) The proposed Zoning District is consistent with the Comprehensive Plan Land Use Map designation.

All proposed zoning districts are consistent with the Comprehensive Plan Land Use Map designations, as detailed below for residential, employment and commercial designations.

- (3) A demonstration that existing or proposed levels of basic urban services can accommodate the proposed or potential development without adverse impact upon the affected service area or without a change to adopted utility plans.

The City has adopted utility plans that include provision of urban services to all areas within the UGB, including the areas included in the UGB Rezoning project, for development at levels consistent with the applied land use designations. Adopted plans include the City of Grants Pass Waster Distribution Systems Master Plan, Water Management and Conservation Plan, Water Treatment Plant Facility Plan, Collection System Master Plan, and Stormwater Master Plan. Each of these master plans was updated after the UGB was expanded in 2014 and were developed using the same population and employment assumptions that were used to update the Comprehensive Plan. Future development of individual sites will require detailed applications that demonstrate compliance with minimum urban service levels for the proposed development.

- (4) A demonstration that the proposed amendment is consistent with the functions, capacities and performance standards of transportation facilities identified in the Master Transportation Plan.

The City is in the process of adopting an updated Master Transportation Plan (now referred to as the Transportation System Plan) that includes transportation facilities to serve all forecasted development in the UGB including within the UGB Rezone project area. The Transportation System Plan was developed based on land use modeling assumptions consistent with the adopted land use designations and the 2014 population and employment assumptions used to update the Comprehensive Plan. Because the proposed zoning districts are consistent with the adopted land use designations in terms of future traffic generation, the proposed rezone is consistent with the Transportation System Plan. Future development of individual sites will be required to complete detailed transportation analysis that demonstrates adequacy of transportation facilities existing or planned to serve the proposed development.

- (5) The natural features of the site are conducive to the proposed Zoning District. Natural features within the project area have been taken into account with the proposed zoning districts. Specifically, low density residential zones (R-1-12 and R-1-10) have been selected for Low Density Residential-designated sites with slopes over 15% and/or wetland and riparian areas, to reduce development pressures on sensitive lands. Medium to High Density zones

have been applied in areas with slopes less than 15% and that have a reduced likelihood of impacting natural features. Within Employment-designated areas, the Industrial zone has not been applied on parcels with slopes greater than 5% because greater slopes cannot accommodate larger-scale industrial development without significant grading, site disruption and cost.

(6) The proposed zone is consistent with the requirements of all overlay Districts that include the subject property.

No Overlay Districts are included within the properties that comprise the UGB Rezone Application; criterion is not relevant.

(7) The timing of the zone change request, is appropriate in terms of the efficient provision or upgrading of basic urban services versus the utilization of other buildable lands in similar zoning districts already provided with basic urban services.

Under the terms of the adopted Intergovernmental Agreement between the City and Josephine County, the City may apply urban zoning to rural areas within the City's UGB that are not annexed. The City has adopted utility and transportation master plans that will ensure efficient provision of urban services to these areas as they develop.

The residential zone changes are particularly timely to increase the supply of buildable residential land at urban densities to address a housing shortage in the City and a statewide housing emergency.

Residential Designations And Implementing Zone Considerations

The residential designations apply to the greatest amount of area affected by the UGB Rezoning project, and have the greatest number of implementing zone districts. One of the primary goals of this project is to make more land available for residential development at urban densities, to address population growth, high demand for new housing development, and concerns about housing availability, variety and affordability.

There are multiple implementing zones for each of the residential comprehensive plan designations, with a range of density limits and housing types permitted in each zone. The implementing zoning districts for each designation are largely distinguished by their allowed maximum densities, as shown in Table 2.

Table 2: Implementing Zones for Comprehensive Plan Designations

Comprehensive	City Zoning	Maximum	Minimum Lot Area
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Plan Designation	District	Density ¹	
<i>Low Density (LR)</i>	<i>R-1-12</i>	3.96 units/acre	11,000 SF
	<i>R-1-10</i>	4.84 units/acre	9,000 SF
	<i>R-1-8</i>	6.22 units/acre	7,000 SF
<i>Moderate Density (MR)</i>	<i>R-1-6</i>	8.71 units/acre	5,500 SF or 4,500 SF per unit
	<i>R-2</i>	12.44 units/acre	5,000 SF or 3,500 SF per unit
<i>Moderate High Density (HR)²</i>	<i>R-3-2</i>	12.44 - 20 units/acre	5,000 SF or 2,178 SF per unit
<i>High Density (HRR)³</i>	<i>R-4-2</i>	20 - 34.8 units/acre	5,000 SF or 1,100 SF per unit
	<i>R-5</i>	20 - 50 units/acre	5,000 SF or 870 SF per unit

1. City of Grants Pass Development Code Schedule 12-4a.
2. The R-3-1 zone also implements the HR designation, but is a legacy zone and not intended to be applied to properties after the TSP is adopted, and therefore is not included here as a zone option.
3. Similarly, the R-4-1 zone also implements the HRR designation but is not proposed here as a zone option.

Allowed residential uses are generally consistent among the zones within each designation. One exception is within the MR designation, which can be implemented by the R-1-6 zone, in which uses are generally limited to single-family detached and duplex dwellings under current zoning, and the R-2 zone, which permits a broader mix of dwelling types. The primary residential uses by zoning district include:

- ***R-1 Districts.*** Primarily single-family detached and single detached manufactured homes. Duplexes, townhouses and multifamily can be incorporated only through a Planned Unit Development or Hearings Officer review in the R-1-6 zone under current zoning standards, but will soon be permitted in these zones as part of statewide middle housing zoning updates.²

² Allowed residential uses in low-density districts will be changing no later than June 30, 2022 to allow a greater variety of middle housing types to include duplexes,

- **R-2 District.** Single-family detached, single-family attached, manufactured home parks, townhomes, duplexes, and multifamily.
- **R-3 District.** Single-family detached, townhomes, manufactured (single detached and manufactured home parks), duplexes, and multifamily. Maximum density of 20 units per acre is typically representative of 2-story development.
- **R-4 and R-5 Districts.** Single-family detached, townhomes, manufactured (single detached and manufactured home parks), duplexes, and multifamily. Maximum density of 50 units per acre is typically representative of 3-story development.

The single most important goal when applying residential zones is to ensure adequate development capacity to build the number of dwelling units forecasted in the adopted Housing Needs Analysis. The areas within the UGB were expressly incorporated in order to provide sufficient land for residential development that meets projected housing need. Overall, the 2014 Housing Needs Analysis (HNA) forecast the need for 5,643 new dwelling units across 1,068 gross acres in the UGB. For the 398 residential acres within the UGB affected by this rezone, 2,172 new dwelling units are forecasted across the four designations based on HNA density assumptions.

Table 3: Projected Housing Unit Capacity for Residential Acres

	LR	MR	HR	HRR	Totals
Gross acres	97.08	213.09	13.87	73.62	397.66
HNA projected density (du/gross acre)	4.4	4.7	10.1	8.2	
Projected units	427	1,002	140	604	2,172

The implementing zones chosen for these areas must create sufficient development capacity for the 2,172 needed housing units in order to be consistent with the adopted Comprehensive Plan. Tables 4-7 compare the needed residential capacity for each designation to the density and development capacity of the corresponding implementing zones. Comparing the HNA’s density assumption for each designation with the minimum and maximum densities for each zone illustrates whether it is possible to meet the HNA assumptions: if the maximum density of an implementing zoning district is lower than the assumed density in the HNA, it will

townhouses, triplexes, quadplexes, and cottage clusters on nearly all parcels, to comply with state requirements under HB 2001.

not be possible to develop sufficient housing units to meet housing needs under that zoning district. Applying the allowed densities for each zoning district to determine how many dwelling units could be built provides further information about whether the proposed zoning districts would create sufficient development capacity to meet the needed dwelling units forecast in the HNA.

It should be noted that these calculations of potential dwelling units are likely to overstate the development potential and likely build-out, and should be interpreted as approximate rather than precise forecasts. These planning-level estimates use a rough adjustment factor to convert from gross acres to net acres available for development, consistent with the adopted HNA methodology, but do not account for actual site conditions including areas constrained by natural resources. Further, historical development patterns have been at significantly lower densities than the maximums permitted in each zone. This is particularly true since there are currently no minimum densities for any zones and single-family detached residential is a permitted use even in higher density residential zones, tending to result in lower density developments relative to allowed maximum densities. Minimum density standards are one tool that may help counter these trends and achieve higher built densities in the HR and HRR designations that better meet identified housing needs, as discussed further below.

Within the LR designation, only the highest-density implementing zone (R-1-8) would provide sufficient development capacity to achieve the needed dwelling units forecast in the HNA. Simply comparing the projected net density for the LR designation from the HNA at 5.5 units per net acre with the allowed maximum densities for the three implementing zones shows that the maximum density of the R-1-12 and R-1-10 zones is too low to meet the HNA target, as shown in Table 4. Only the R-1-8 zone that allows up to 6.22 units per net acre exceeds the HNA target density, and thus, allows sufficient development capacity for needed housing units. When zoning the LR-designated properties then, it will be important to zone the majority for R-1-8 with limited application of R-1-12 and R-1-10 zoning in order to provide sufficient residential development capacity. Prioritizing R-1-8 zoning over R-1-12 and R-1-10 zoning is also consistent with adopted efficiency measures in Element 14 of the Comprehensive Plan, as discussed further on page 10.

Table 4: Comparison of Density and Dwelling Unit Capacity for Low Density Residential Designation and Implementing Zones

	LR	R-1-12	R-1-10	R-1-8
HNA projected density (du/gross acre)	4.4			

Gross to net adjustment factor, determined based on projected mix of housing types ¹	19.9%			
Adjusted density (du/net acre)	5.5			
Max density permitted (du/net acre)		3.96	4.84	6.22
Total units projected ²	427	308	376	484
Comparison to HNA needed housing units		(-119)	(-51)	+57

1. See HNA Tables 9.40.23 and 9.40.24 for assumed adjustment factor for each housing type and each designation, based on assumed mix of housing types in each designation. Adjustment factors account for land needed for infrastructure deductions and range from 10% for multifamily to 20% for single-family detached.
2. For the 97.08 LR-designated gross acres within the project area, converted to net acres based on the gross to net adjustment factor.

For the MR, HR, and HRR designations, all implementing zones allow development at densities equal to or greater than the assumed density in the HNA, meaning that any of the implementing zones would be consistent with the HNA requirements. As shown in Table 5, both the R-1-6 and R-2 zones that implement the MR designation allow maximum densities that exceed the HNA project density, and thus, provide sufficient development capacity for dwelling units in excess of the HNA target.

Table 5: Comparison of Density and Dwelling Unit Capacity for Medium Density Residential Designation and Implementing Zones

	MR	R-1-6	R-2
HNA projected density (du/gross acre)	4.7		
Gross to net adjustment factor, determined based on projected mix of housing types ¹	19.3%		
Adjusted density (du/net acre)	5.8		
Max density permitted (du/net acre)		8.71	12.44
Total units projected ²	1,002	1,499	2,141
Comparison to HNA needed housing units		+497	+1,139

1. See HNA Tables 9.40.23 and 9.40.24 for assumed adjustment factor for each housing type and each designation, based on assumed mix of housing types in each designation. Adjustment factors account for land needed for infrastructure deductions and range from 10% for multifamily to 20% for single-family detached.
2. For the 213.09 MR-designated gross acres within the project area, converted to net acres based on the gross to net adjustment factor.

There is only one implementing zone for the HR designation, the R-3-2 zone, which allows development at a maximum density that exceeds the HNA projected density, as shown in Table 6. While the maximum density easily exceeds the needed

capacity, the minimum density just meets the needed capacity for this designation, which suggests that the R-3-2M zone – which includes the minimum density requirement in comparison to the R-3-2 zone, with no minimum standards – would be an important tool to ensure that development capacity within this designation is protected through zoning implementation.

Table 6: Comparison of Density and Dwelling Unit Capacity for Moderate High Density Residential Designation and Implementing Zone

	HR	R-3-2	
HNA projected density (du/gross acre)	10.1		
Gross to net adjustment factor, determined based on projected mix of housing types ¹	11.5%		
Adjusted density (du/net acre)	11.4		
Min density permitted (du/net acre) ²		12.44	
Max density permitted (du/net acre)			20
Total units projected ³	140	153	245
Comparison to HNA needed housing units		13	105

1. See HNA Tables 9.40.23 and 9.40.24 for assumed adjustment factor for each housing type and each designation, based on assumed mix of housing types in each designation. Adjustment factors account for land needed for infrastructure deductions and range from 10% for multifamily to 20% for single-family detached.
2. For the R-3-2M zone.
3. For the 13.87 HR-designated gross acres within the project area, converted to net acres based on the gross to net adjustment factor.

Within the HHR designation, either the R-4-2 or R-5 implementing zones provide significant capacity in excess of the HNA target, as shown in Table 7. The minimum density variants of both of these zones would result in approximately double the number of units projected in the HNA for the HHR designation. Development at the maximum densities for either zone would further exceed the HNA targets. Thus, either the R-4-2 or R-5 zone could satisfy the comprehensive plan goals and the minimum density variant, while helpful, is less essential to ensure that HNA targets are met than in the HR designation.

Table 7: Comparison of Density and Dwelling Unit Capacity for High Rise Density Residential Designation and Implementing Zone

	HHR	R-4-2	R-5
HNA projected density (du/gross acre)	8.2		

Gross to net adjustment factor, determined based on projected mix of housing types ¹	12.9%				
Adjusted density (du/net acre)	9.4				
Min density permitted (du/net acre) ²		20		20	
Max density permitted (du/net acre)			34.8		50
Total units projected ³	604	1,283	2,233	1,283	3,208
Comparison to HNA needed housing units		679	1,629	679	2,604

1. See HNA Tables 9.40.23 and 9.40.24 for assumed adjustment factor for each housing type and each designation, based on assumed mix of housing types in each designation. Adjustment factors account for land needed for infrastructure deductions and range from 10% for multifamily to 20% for single-family detached.
2. For the R-4-2M and R-5M zones respectively.
3. For the 73.62 HHR-designated gross acres within the project area, converted to net acres based on the gross to net adjustment factor.

The City has adopted a number of efficiency measures in the Comprehensive Plan guiding the efficient use of residential land to achieve target HNA densities, including selecting higher-density zones to implement the plan designations. The 6.7 dwelling units per net acre overall target density adopted in the HNA represents a 24% increase over the historical density of 5.1 dwelling units per net acre; achieving target density will require new, more efficient ways of using land compared to previous development patterns as required by ORS 197.296(7). The adopted efficiency measures relevant to residential zoning include:

- Efficiency Measure 1f: Increase ratio of higher to lower density plan designations and zones for new lands to be included in the UGB. This measure calls for both increasing the amount of residential land with higher density designations, that is, MR, HR and HRR relative to LR designations, and using higher-density zones to implement each designation. For the latter, this includes prioritizing the R-1-8 zone over the R-1-12 and R-1-10 zones to implement the LR designation and prioritizing the R-2 zone over the R-1-6 zone to implement the MR designation, though a mix of zoning districts is still forecast for each designation. (See Comprehensive Plan Element 14 pg 14A-7.)
- Efficiency Measure 1h: Generally limit use of lowest density zones within LR plan designation to areas with slope and natural features constraints. R-1-12 zoning would only be applied in areas that generally have slopes over 25% and riparian areas, and R-1-10 would only be applied in areas that generally have slopes between 15% and 25%. R-1-8 would be applied to all other LR-

designated areas without constraints, to achieve greater built densities. (See Comprehensive Plan Element 14 pg 14A-9.)

These efficiency measures directing the use of the higher density zones to implement the LR and MR designations are also consistent with the earlier findings that the higher density zoning districts are necessary to achieve target densities and dwelling unit capacity.

Other considerations from the Comprehensive Plan to guide selection of the implementing zones generally guide the selection of higher-density zones around community amenities and high-capacity facilities. Such amenities and facilities include:

- Major transportation corridors
- Transit services
- Parks
- Schools
- Commercial and service nodes, including the hospital and community college

The application of residential designations generally follows this pattern. For example, the highest density designations along Allen Creek Road are in the north in proximity to transportation, transit and commercial services along Hwy 199 (Redwood Highway). Finer grained application of zoning districts within each designation could further implement this direction, but zoning districts should generally be applied across large enough contiguous areas to avoid “spot” zoning of small parcels with different zoning adjacent to one another.

Protection of natural resources is another consideration when applying the implementing zones for each designation. Natural resources and natural hazards present in Grants Pass include steep slopes, floodplains, and wetland and riparian areas. Development on steep slopes tends to occur at lower densities because of additional land needed to create buildable portions of the site, and limitations of infrastructure development. Historically, the City has zoned areas at 15% or greater slopes with R-1-12 zoning in recognition of the larger lot sizes and lower densities appropriate for such sites.

Summary of proposed factors to guide residential zone implementation:

- Implement zoning that provides the highest probability of meeting the housing needs adopted in the Comprehensive Plan and Housing Needs Analysis.

- Apply higher density zones for the Low and Medium Density Residential designations to achieve efficient use of land, and ensure adequate development capacity for needed housing units within the LR designation.
- Limit use of R-1-10 and R-1-12 zones to properties with 15% or greater slopes, wetland and riparian areas, and other development constraints.
- Prioritize the R-3-2M district to implement the HR designation; minimum densities will be important to ensure that adequate development capacity is created to meet HNA targets.
- Allow flexibility when selecting the implementing zones for the HRR designation, given that both the R-4-2 and R-5 implementing zones provide excess capacity to meet the needed number of dwelling units. Consider applying minimum densities to these properties to ensure capacity is used efficiently and meets targets.
- Within each designation, apply higher density zones near transportation corridors, transit services, commercial and service nodes, schools and parks while avoiding spot zoning.

Employment Designations And Implementing Zone Considerations

There are 90.1 acres³ designated for employment use within the UGB Rezoning project area, which will be important for providing future job growth opportunities and economic development. There are three possible implementing zones for this designation:

- ***Business Park District (BP)***. Mixed-use zone for light industrial and commercial uses, with significant performance standards to minimize impacts outside of buildings.
- ***Industrial Park District (IP)***. Light industrial uses in a campus-like setting, with significant performance standards to minimize impacts and uses outside of buildings.
- ***Industrial District (I)***. Industrial uses with heavier impacts upon their surroundings and the need for outdoor functions.

Estimating employment land needs and factors is guided by need for parcels of various sizes corresponding to the typical size of a firm. Industrial sites of all sizes

³ Of these, 2.09 acres are designated Business Park and will be zoned Business Park. The remaining acres have the broader Employment designation that can be implemented by any of the three zones.

ranging from less than 1 acre to 50+ acres are needed. (See Table 14.30.4, Comprehensive Plan Element 14 pg 14-29.) The Comprehensive Plan identifies a need for parcels 5-20 acres in size for industrial uses. (See Comprehensive Plan Element 14 pg 14-40.)

Historically, the City has largely relied on the BP and I districts with limited use of the IP district. Of existing employment lands within city limits, 46% are zoned BP, 46% zoned I, and only 8% zoned IP. (2008 data; see Table 14.20.2, Comprehensive Plan Element 14 pg 14-13.) City Community Development Director Lora Glover reported greater success implementing development regulations in the BP zone than the IP zone. The BP and I zones provide greater site development flexibility. However, the IP zone may still have strong applicability where the campus-like setting that is required of IP projects may help with neighborhood compatibility.

The City's economic development strategies include pursuing a broad range of employment uses, with a focus on retaining and expanding local industries.⁴ These strategies likely translate to a mix of zones, without clearly prioritizing between the implementing zones. City Business Advocate Susan Seereiter observed a need for more I lands for new and existing industries to expand, with limited demand for large BP-zoned sites that could accommodate new corporate campuses.

Employment uses can have significant off-site impacts and the application of non-residential zones should carefully take into account surrounding uses. The BP and IP zones include measures to minimize off-site impacts, such as prohibitions on outdoor storage and heavy manufacturing, whereas the most intense industrial uses can be located in the I zone. For those reasons, BP zoning, and IP zoning to a lesser degree, should be considered the most compatible with abutting residential or commercial properties. Industrial zoning would be best suited to large tracts of land surrounded by other employment uses. The majority of the employment-designated areas are located in the North subarea, where proximity to other employment areas could support a mix of any of the three zoning districts. For a smaller employment-designated area in the Southwest subarea south of Hwy 199 (Redwood Highway), proximity to residential and commercial uses would better support BP zoning.

Parcel size and topography also influences suitability for certain types of employment uses. Generally, larger (20+ acre) and flatter sites with slopes of less than 5% are better suited for industrial uses permitted in the I zone, while smaller

⁴ Economic Development Strategic Plan, 2016.

<https://www.grantspassoregon.gov/DocumentCenter/View/9932/Economic-Development-Strategic-Plan?bidId=>

sites (20 acres or less) and those with minor slopes can be more flexible for business park-type uses.

Summary of proposed factors to guide employment zone implementation:

- Prioritize BP and I zoning, both of which have seen greater success and reported need compared to the IP zone.
- Prioritize BP and IP zoning near residential and commercial areas to limit off-site impacts, and locate I zoning within employment areas to provide better buffering.
- Consider I zoning for larger (20+ acre) and flatter sites with slopes of less than 5%, and BP zoning for smaller sites (20 acres or less) with minor topographical challenges.

Commercial Designations And Implementing Zone Considerations

There are 55.7 acres designated for commercial use within the UGB Rezoning project area, which will be important for providing services for future residents, future job opportunities and economic development. There are three potential implementing zones for this designation:⁵

- ***Neighborhood Commercial District (NC)***. Small businesses located within residential zoning districts which serve the retail and personal services needs of nearby residents.
- ***General Commercial District (GC)***. All commercial and professional uses, excepting those requiring on-site manufacture or assembly.
- ***Office Residential (OR)***. Office uses where more intensive retail uses may not be suitable, which permit residential uses as a secondary use.

Similar to employment lands, estimating commercial land needs and factors is guided by need for parcels of various sizes corresponding to size of firm.

Commercial sites of all sizes ranging from less than 1 acre to 20-50 acres are needed, with a priority on sites less than 2 acres in size. (Table 14.30.4, Comprehensive Plan Element 14 pg 14-29.) However, no distinction is made between the characteristics and capacity of each of the implementing zones to provide the suitable mix of parcels.

⁵ The Central Business District and Riverfront Tourist Commercial District are geographically specific zones that do not apply within the UGB Rezone project area.

Parcel size and location should guide application of the various zoning districts. The maximum size for sites with the NC zone is 0.5 acres because it is intended for use within residential neighborhoods, whereas there are no minimum or maximum size for development in the GC or OR zones. (Grants Pass Development Code Schedule 12-7.) The commercially designated properties within the project area are largely located south of Hwy 199 (Redwood Highway) rather than integrated within residential neighborhoods; the designated parcels and contiguous clusters of commercially designated land greatly exceed 0.5 acres and thus will be more suitable for GC and OR zoning.

Because GC zoning supports a broad range of commercial, retail and service uses, it should be applied more broadly to implement the Commercial designation, particularly along major transportation corridors where access and demand for range of services is greatest. The OR district should be targeted to sites better suited to office than retail development, and limited to avoid oversaturating the market with office development opportunities.

Proposed zoning should also be compatible with adjacent zoning districts. For the commercially designated areas south of Hwy 199 (Redwood Highway), surrounding properties are zoned GC, high-density residential, and BP for employment use. Such zones support selection of the GC and OR districts within the project area, with additional consideration of the OR zone as a buffer between residential uses and employment or commercial uses.

Summary of proposed factors to guide commercial zone implementation:

- Apply GC and OR zoning to all sites larger than 0.5 acres, and reserve NC zoning for future commercial development within residential neighborhoods.
- Prioritize GC zoning that supports the widest range of commercial uses for the majority of the Commercial-designated lands, particularly along major transportation corridors such as Hwy 199 (Redwood Highway).
- Apply OR zoning as a buffer between residential uses and employment or commercial uses.

Overall Factors to Guide Implementing Zone Selection

Compliance with the specific factors within each designation and the following general factors will ensure that the implementing zones for the UGB Rezone Application project meet the Comprehensive Plan policies, zoning standards, and approval criteria for rezones.

- *Implement the comprehensive plan designations:* Implementing zones must be consistent with the land use designations.
- *Achieve compatibility with surrounding areas and adjacent parcels' zoning:* Implementing zones should be consistent with zoning of adjacent parcels, or compatible in terms of scale and impacts of development relative to existing zoning.
- *Match the site's physical features:* Implementing zones should take into account parcel size, topography and development constraints relative to development standards and permitted uses.
- *Balance existing land uses with proposed zoning:* Compare existing site uses to proposed zoning and weigh the potential implications of creating any nonconforming uses.
- *Provide adequate housing capacity:* Within the residential zones, select a mix of zones with adequate development capacity to accommodate needed housing units.
 - Achieve residential land use efficiencies by selecting higher density zones within each designation.
 - Limit the lowest-density residential zones within the LR designation to sites with development constraints.
 - Employ the minimum density standards for R-3-2, R-4-2 and R-5 zoning.
- *Intensify residential zoning near amenities:* Within each designation, locate higher-density implementing zones near major streets and transit, commercial and service nodes, and community amenities.