



CITY OF MEDFORD

PLANNING DEPARTMENT

MEMORANDUM

SUBJECT: Urban Growth Boundary Amendment project,
Phase 1: Internal Study Area adoption
file no. CPA 13-032—**Supplement** to staff report dated January 15, 2014

TO: Planning Commission

FROM: John Adam, Planner IV, *via* Bianca Petrou, Assistant Planning Director

DATE: March 6, 2014 *for 3/13/2014 meeting*

Background

After two hearings, staff has prepared a recommendation based on the qualitative criteria that were developed with the Planning Commission last fall and based on some of the ideas from the January 23 and February 13 testimony. The task of the Planning Commission at this point is to select the Proposed Amendment Locations (PALs) out of the group of internal study areas (ISAs).

GLUP type	Land need <i>in acres</i>	Amount analyzed <i>in acres</i>	Percent of need
CM	708	250	35%
UH	90	179	200%
UM	70	381	544%

Clearly, there is a lot to choose from in the two residential categories, and there is the possibility of meeting most if not all the UH and UM need within the existing urban area. Conversely, if all the CM areas are found to be suitable to both the Planning Commission and the City Council, it would satisfy only a third of the commercial land need.

Qualitative Criteria

As noted in the original staff report, the technical analysis did not reveal any major problems in the study areas. By and large, the changes could be made without

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significant upgrades to sewer and water services. The unknown factor is transportation, which will have to be comprehensively addressed in the combined internal GLUP changes and external expansion. The vital transportation issues yet to be tackled are “level of service” (LOS) and concurrency. Concurrency is the policy of requiring sufficient transportation system capacity to be in place at the time of development instead of relying on planned or programed capacity improvements.

Realizing that the ISAs could not easily be reduced to a smaller group of candidates based on the technical analyses, staff and the Planning Commission developed a set of qualitative factors in the fall of 2013 that rated residential ISAs on a scale of one to five¹ for the following:

1. Parcelization: smaller lots are less desirable than larger lots
2. Proximity to an elementary school: more desirable for young families with young children, who are likelier to be in smaller housing
3. Proximity to a grocery store: the closer the store, the greater the transportation mode choices
4. Proximity to transit: greater transportation mode choice
5. Variety of land-use types in vicinity: this was applied only to UH-designated ISAs on the premise that a greater variety of different land uses (and zoning) within a quarter-mile periphery is conducive to a vibrant mix and has a greater degree of compatibility. The greater the variety, the higher the score.

These qualitative factors were not intended to be deterministic on their own, but to serve as guides for the Planning Commission in creating a recommendation. Staff’s approach in coming up with a recommendation was to balance the qualitative scores with testimony, and after taking a closer look at on-the-ground conditions in the internal study areas as a feasibility check.

Selection Process

Beginning with the qualitative scores, the top candidates for changes to higher-density residential (such as ISAs 540 and 250) were retained and set aside. The bottom candidates were either dropped or pulled aside and closely examined to see if modifications made sense.

The table of ISAs, the PALs, and staff’s considerations follows below. Note that the qualitative scores pertain only to the residential parts (UM, UH) of the ISAs. There

¹ The last factor in the list was an exception to this; its score range was 2–4 in order to weigh it less heavily than the others.

were no qualitative scoring criteria for the commercial (CM) parts. Also note that the column labeled “Considerations” incorporates scores, testimony, and further analysis as noted.

ISA ID	PAL ID	Considerations scores, testimony, other analysis
140	140a-cm	Some lots along the eastern edge of this are already developed and some owners requested exclusion. The owner of a large part of this PAL supported the change. <i>Recommendation</i> — retain as modified: delete some developed lots on eastern edge
211	n/a	Qualitative score 4.2 This single large lot has the problem of low water pressure above a certain elevation, which on its own recommends a great reduction of the analyzed UH. In addition, the single owner is against any change, so it may be worthwhile to drop this from consideration entirely. <i>Recommendation</i> — delete
212	212a-um 212b-uh	Qualitative score 3.6 Finding a way to reduce the amount of UH in this area is complicated by its being on the edge of the urbanizable area, the location of Springbrook Road relative to that, a tier of single-family lots on its western edge (on Arrowhead Drive), and the shapes of the lots comprising ISA 212. Staff recommends a reduction of UH to a small area north and south of existing UR development to break up areas of UH, and introducing a patch of UM in the northwest remainder. <i>Recommendation</i> — retain as modified: reduce area of UH and change part to UM
213	213a-uh 213b-uh	Qualitative score 4.3 Taking a cue from the landowner’s vision for ISA 930, and testimony that supported the concept of “building toward” a higher-density designation, this area was reduced in extent and pulled away from direct adjacency to built UR neighborhoods. Its location on the future extension of Springbrook was retained. <i>Recommendation</i> — retain as modified: reduce area of UH
214	214a-cm	There was no opposition to this change. <i>Recommendation</i> — retain as analyzed: CM

ISA ID	PAL ID	Considerations scores, testimony, other analysis
215	215a-ur 215b-cm 215c-uh	<p>Qualitative score 4.0</p> <p>The UH score was high. It is located between the CM area and other UH to the east. There was no opposition to the CM change. UR is recommended at the northeast corner because the Owen Drive extension severed a lot and left a useless triangle of GI on the north side of the street.</p> <p><i>Recommendation</i> — retain as analyzed: CM, UR, UH</p>
216	216a-cm	<p>There was no opposition to this change</p> <p><i>Recommendation</i> — retain as analyzed: CM</p>
240	n/a	<p>Qualitative score 3.8</p> <p>Many of the property owners objected to a change from UR to UM, and the neighborhood was also opposed. Consultation with colleagues in the development division also revealed some of the problems inherent in the site that make development of any kind problematic; specifically, bridging the stream running across the southern end of the area to provide access to Lone Pine Road. Access and circulation constraints in an area already riddled with cul-de-sacs would not be helped by increased density.</p> <p><i>Recommendation</i> — delete</p>
250	250a-um	<p>Qualitative score 4.5</p> <p>The church that occupies the northern third of this lot may or may not develop the remainder, yet this PAL has the benefits of proximity to transit and adjacency to UH and North Medford H.S.</p> <p><i>Recommendation</i> — retain as analyzed: UM</p>
310	n/a	<p>Qualitative score 2.5</p> <p>Analyzed for changes to UM and CM, the topographic and hydrologic constraints in this area became more apparent on closer examination. Most of the lots in this area are not very deep to begin with and are further constrained by steep slopes and canals.</p> <p><i>Recommendation</i> — delete</p>

ISA ID	PAL ID	Considerations scores, testimony, other analysis
510	510a-cm 510b-uh	<p>Qualitative score 3.8</p> <p>The piano-like shape of ISA 510 exactly describes a swatch of UR amid a blanket of CM, GI, and HI between the interstate and Highway 99. The construction of the new South Medford Interchange rerouted Garfield through this area. Despite its middling score—due in large part to the parcelization along Charlotte Ann Road—it would not do to retain this as UR. There was no opposition from this area and one letter of support.</p> <p><i>Recommendation</i> — retain</p>
540	540a-cm 540b-um 540c-uh 540d-um	<p>Qualitative score 4.6</p> <p>This area scored very well for residential. The northerly strip that was analyzed for conversion to UM from CM, however, appears to staff on reflection to be counter to the objective to find more CM land in the City. Staff therefore recommends removing it. Staff also changed its recommendation to include UH in the southern half of this area because of large reductions elsewhere.</p> <p>Also, an approval here would “orphan” some strips of UR land sandwiched between this ISA and the PS designation to the west. Staff recommends adding these to PAL (proposed amendment location) 540 with CM and UM designations.</p> <p><i>Recommendation</i> — retain as modified: change north UR strip to CM; remove UM from CM lot at north end; change part of UM to UH; add small lot at southwest as UM</p>
620	n/a	<p>Qualitative score 2.9</p> <p>The parcelization of this area, low score, and its lack of a CM component left it with little to recommend changing it to UM. Testimony highlighted the poor state of infrastructure in the area and lack of transit.</p> <p><i>Recommendation</i> — delete</p>
630	630a-uh 630b-um 630c-cm	<p>Qualitative score 3.1</p> <p>Irregular parcelization and a middle-low score led staff to recommend retention only of the CM, part of the UM, and the addition of a few acres of UH on the future extension of Cunningham/Willow.</p> <p><i>Recommendation</i> — retain as modified: reduce UM, retain CM, add some UH</p>

ISA ID	PAL ID	Considerations scores, testimony, other analysis
640	640a-um 640b-uh 640c-cm	<p>Qualitative score 3.6</p> <p>A middling score and some letters of support in this area were balanced against the irregular parcelization, resulting in a recommendation to reduce some of the chopped up UM and retain the UH, although it should be noted that would put UH up against the backs of several UR lots fronting on Windward Drive. Staff also recommends extending the CM one lot eastward to capture an existing auto repair business. There were two letters of support from the vicinity.</p> <p><i>Recommendation</i> — retain as modified: reduction in CM and adjustment of CM</p>
670	670a-um 670b-uh	<p>Qualitative score 3.2</p> <p>Irregular parcelization and a middle-low score led staff to recommend retention of the UH portions and reduction of the UM. Note that the addition of CM on the other corner (PAL 640c-cm) would increase the qualitative score for the UH.</p> <p><i>Recommendation</i> — retain as modified: reduce UM and retain UH</p>
718	718a-uh 718b-cm	<p>Qualitative score 4.8</p> <p>The north lot scored the highest out of the ISA group. The owner requested changing the entire lot to UH instead of leaving out the “panhandle.”</p> <p>The one negative factor here is that the property owner of the southern portion opposed the change from UR to CM. The reason staff recommended the change was so that there was not a pocket of UR trapped between CM on the south and UH on the north.</p> <p><i>Recommendation</i> — retain as analyzed with modification: include all of north UH lot and change south lot to CM</p>
719	n/a	<p>Qualitative score 3.8</p> <p>This was a UM recommendation left over from the West Main TOD land-use plan. It is a single third-of-an-acre lot with two structures on it; inclusion does not appear to be logical on re-examination.</p> <p><i>Recommendation</i> — delete</p>

ISA ID	PAL ID	Considerations scores, testimony, other analysis
730	730a-um	<p>Qualitative score 3.6</p> <p>A change here would render little in the way of new UM capacity given that it is already developed, but the change may provide an incentive to redevelop—aided perhaps by an urban renewal district with the power to assemble land for redevelopment. This area is too well situated to remain UR. There was one letter of support from an owner in the area.</p> <p><i>Recommendation</i> — retain as proposed</p>
740	740a-cm	<p>The purpose of this PAL is to correct the GLUP so it matches the commercial zoning and uses.</p> <p><i>Recommendation</i> — retain as proposed</p>
750	750a-cm	<p>The purpose of this PAL is to correct the GLUP so it matches the commercial zoning and uses.</p> <p><i>Recommendation</i> — retain as proposed</p>
760	760a-cm	<p>The purpose of this PAL is to correct the GLUP so it matches the commercial zoning and uses.</p> <p><i>Recommendation</i> — retain as proposed</p>
810	810a-um	<p>Qualitative score 3.8</p> <p>Although parcelized, a large part of this is classified redevelopable or partially developed. Leaving select parts out would create small insinuations of UR into a solid block of UH on the north and south. Its only real deficit is the parcelization; all the other factors score very well for this area. There were no objections from this vicinity.</p> <p><i>Recommendation</i> — retain as proposed</p>
930	<p>930a-um</p> <p>930b-cm</p> <p>930c-um</p> <p>930d-cm</p>	<p>Qualitative score 3.3</p> <p>Despite a middle-low score, the opportunity for a mixed-use area of CM and UM (which would increase its score), plus the willingness of the land owners to work toward a solution, recommended this area for retention.</p> <p><i>Recommendation</i> — recommend land owner’s modified suggestion of approximately 11 acres of UM (in two spots) and approximately 13 acres of CM (in two spots) in the southeastern corner at Hillcrest and Foothill Roads.</p>

ISA ID	PAL ID	Considerations scores, testimony, other analysis
940	940a-cm	Qualitative score 3.6 Much of the attraction of this area stems from the opportunity to introduce CM into an area that lacks commercial within anything but automobile distance, but review of the south lot makes the slope on it less suitable for CM designation; therefore, staff proposes moving the CM to the north lot and reducing the UM on the south half to allow UR to build toward the higher density. <i>Recommendation</i> — retain as modified: shift CM to north lot and reduce UM to smaller area at the northwest corner of the south lot
	940b-um	
950	950a-um	Qualitative score 4.3 This scored well, but the irregular shape of the analyzed lot would introduce UM adjacent to a number of backyards. Following the principle of “building toward” the higher-density designation, staff recommends reduction of the area to the northwest third. <i>Recommendation</i> — retain as modified: reduce UM

Development Capacity Analysis

After putting its recommendations together into a set of “Proposed Amendment Locations” (PALs), staff performed a development capacity analysis on the lots in the proposed areas to determine how much of the City’s 20-year land need could be satisfied by the proposed changes. The categories of buildable land and the assumptions used to determine capacity are in the table below.

Classification	Capacity Assumptions
Developed	The lot area was zeroed out, unless larger than 0.5 acres, in which case an estimate of capacity was made using aerial photos
Partially Developed Residential (PDR)	As described in the Buildable Lands Inventory, a quarter acre was removed from each lot with this designation
Redevelopable	Using the guidelines from Table 28 of the Housing Element, the redevelopable lots were reduced by their probability that they would redevelop in the planning period. The relevant features from the table are:

Classification	Capacity Assumptions	
	Lot size	Probability of redevelopment
	0.1–0.99	29%
	1.00–1.99	34%
	2.00–2.99	52%
	3.00 and greater	83%
	Staff stretched this assumption to the commercial lots	
Vacant	No adjustments were made. The entire lot is considered developable.	

A table showing the lot-by-lot capacity calculation is attached to this report (Exhibit B, pp. 17–28), titled “Capacity Analysis of PAL lots.”

The table below shows the total estimated acreage amounts to be gained from the PALs for each GLUP designation. Out of 538 gross acres in PALs, the total capacity is calculated to be 321 acres.

The “Land Need” in the table are the gross acres needed for each of the identified GLUP designations according to the *Economic Element* (for CM) and the *Housing Element* (for UH and UM). Note that there is no chance and was never any chance of coming close to meeting the CM target within the current urban area, so it is perhaps superfluous or misleading to note that the capacity falls so far short of the target for that classification.

Proposed GLUP	PAL Capacity <i>in acres</i>	Land Need <i>in acres</i>	Amt. over or (under) target
CM	162	708	(546)
UH	83	90	(7)
UM	75	70	5
	321		

Inclusion Requests

Over the course of this process the City has received several inclusion requests, listed below. Following the table is a discussion of the merits of each request.

Ref. no.	Map/taxlot	Site address	Acres	Current GLUP	Requested GLUP
1	37-1W-05/1000	NE and NW corners of Crater	4.6	GI	CM
	37-1W-05/1001	Lake Ave and Coker Butte Road	2.9		
	37-1W-05/1002		3.2		
	37-1W-05/1003		1.8		
2	37-1W-07A/1200	3843 Crater Lake Highway	1.0	GI	CM
	37-1W-07A/1300		2.0		
3	37-1W-18AA/2100	2840 Crater Lake Highway	2.4	GI	CM
4	37-1W-21AB/101	3600 Lone Pine Road	0.2	UR	HI
5	37-1W-28A/3300	SE corner of North Phoenix and Hillcrest Roads	4.0 [est.]	UH	CM
6	37-1W-31C/300	200 Garfield Street	1.8	UR	UM
7	37-2W-36DD/100	1708 & 1792 Kings Highway (at Garfield Street)	2.3	UR	CM
	37-2W-36DD/1300		1.0		

Analysis of inclusion requests (by table reference number)

1. These four lots are largely vacant, except that Lot 1001 has a structure on it. They lie immediately to the north of PAL 216a-cm. Their inclusion would benefit the objective of this project.
2. These two lots are would be isolated pockets of CM amid GI. Staff does not recommend their inclusion.
3. This lot would also be an isolated pocket of CM in a GI area. Staff does not recommend its inclusion.
4. This is a single lot in a 15-lot mixed-use PUD. The owner requested HI because of the electrical substation to the north. The small size of the lot and isolation as HI do not recommend it for inclusion.
5. Half of this lot has a CM GLUP. The proposal to is change the whole lot to CM. While its inclusion would achieve one goal—increasing the amount of CM in the urban area—the change would increase the deficit of UH land. The resulting conflict is of a relatively small scale; staff is neutral on inclusion.

6. In this request, the larger lot on the corner of Garfield Street and Kings Highway is vacant, the smaller lot has a house on it. Their inclusion would benefit the objective of this project.

For all the requests it is worth noting that no technical analysis was done and that no notice was provided to neighbors. If any are recommended by the Commission, notice will be provided to neighbors before the City Council hearings.

Recommendation

Direct staff to prepare a revised staff report with a recommendation for approval of the PALs per staff memo dated March 6, 2014.

Exhibits

- | | |
|----------------------------------|-----------|
| A. Maps of the PALs | pp. 12–16 |
| B. Capacity analysis of PAL lots | pp. 17–28 |
| C. Map: ISA Qualitative Scores | p. 30 |
| D. Map: PALs in GLUP context | p. 31 |

Exhibit A: Maps of the Proposed Amendment Locations, Map 1

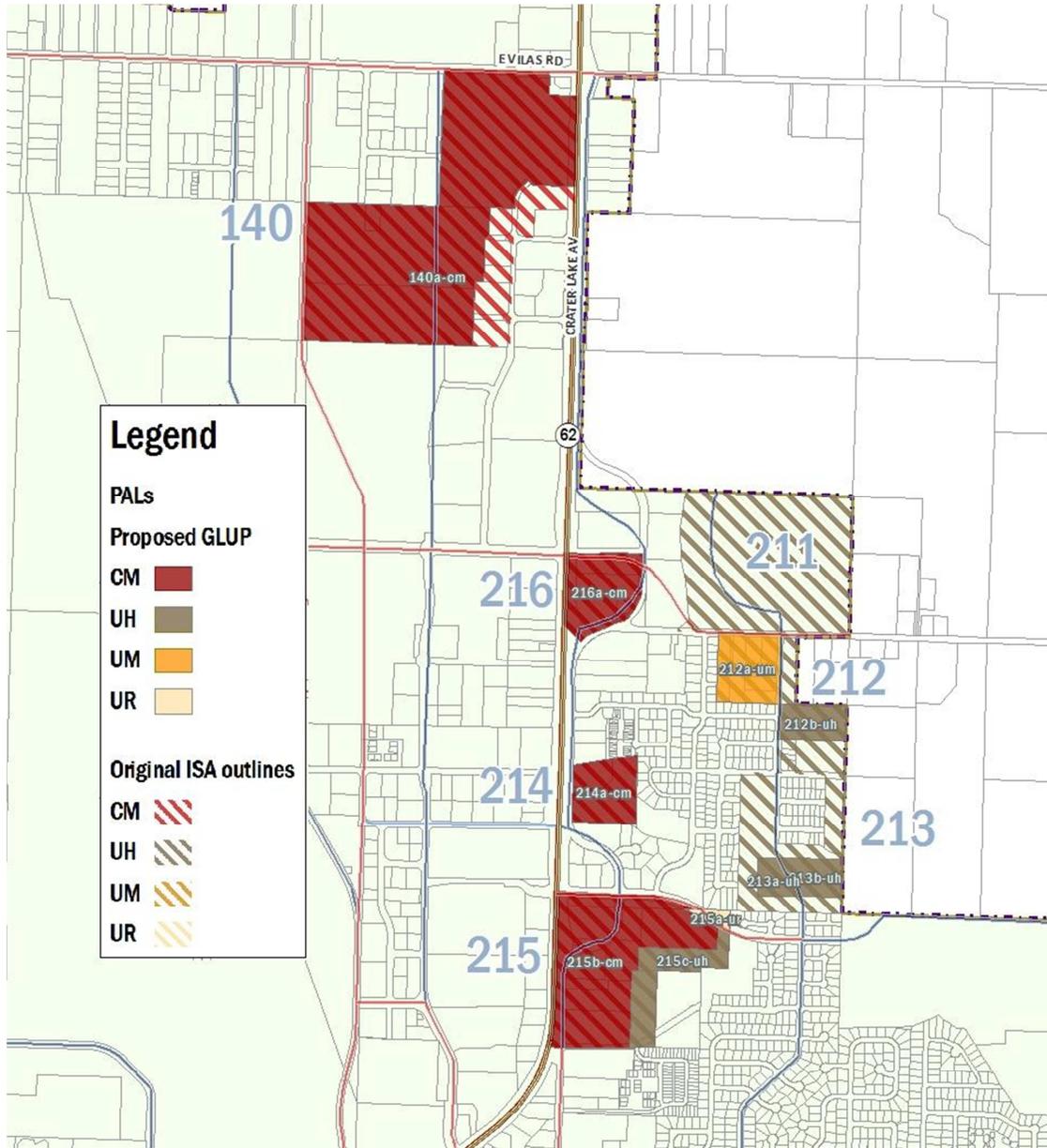


Exhibit A: Maps of the Proposed Amendment Locations, Map 2

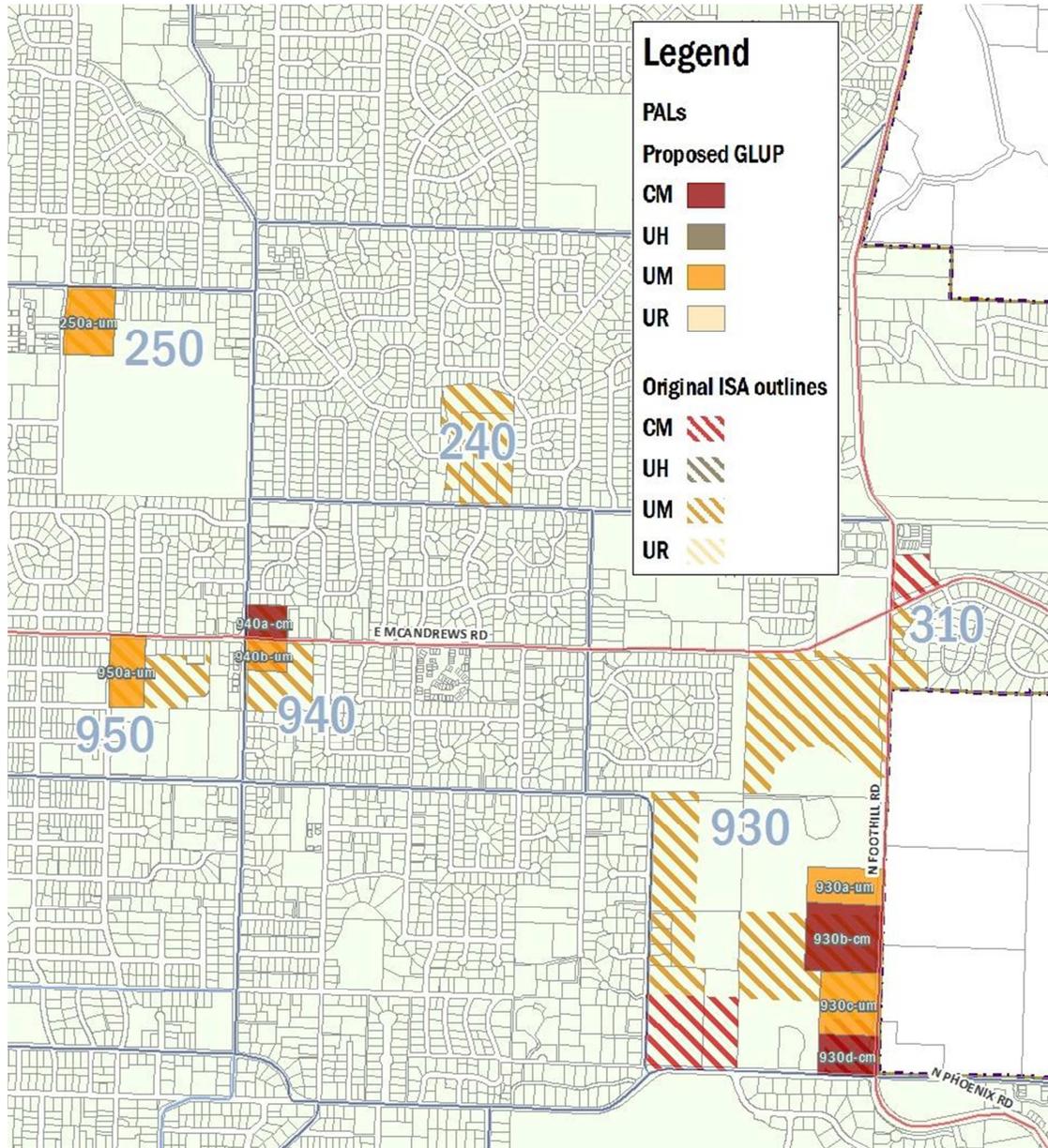


Exhibit A: Maps of the Proposed Amendment Locations, Map 3

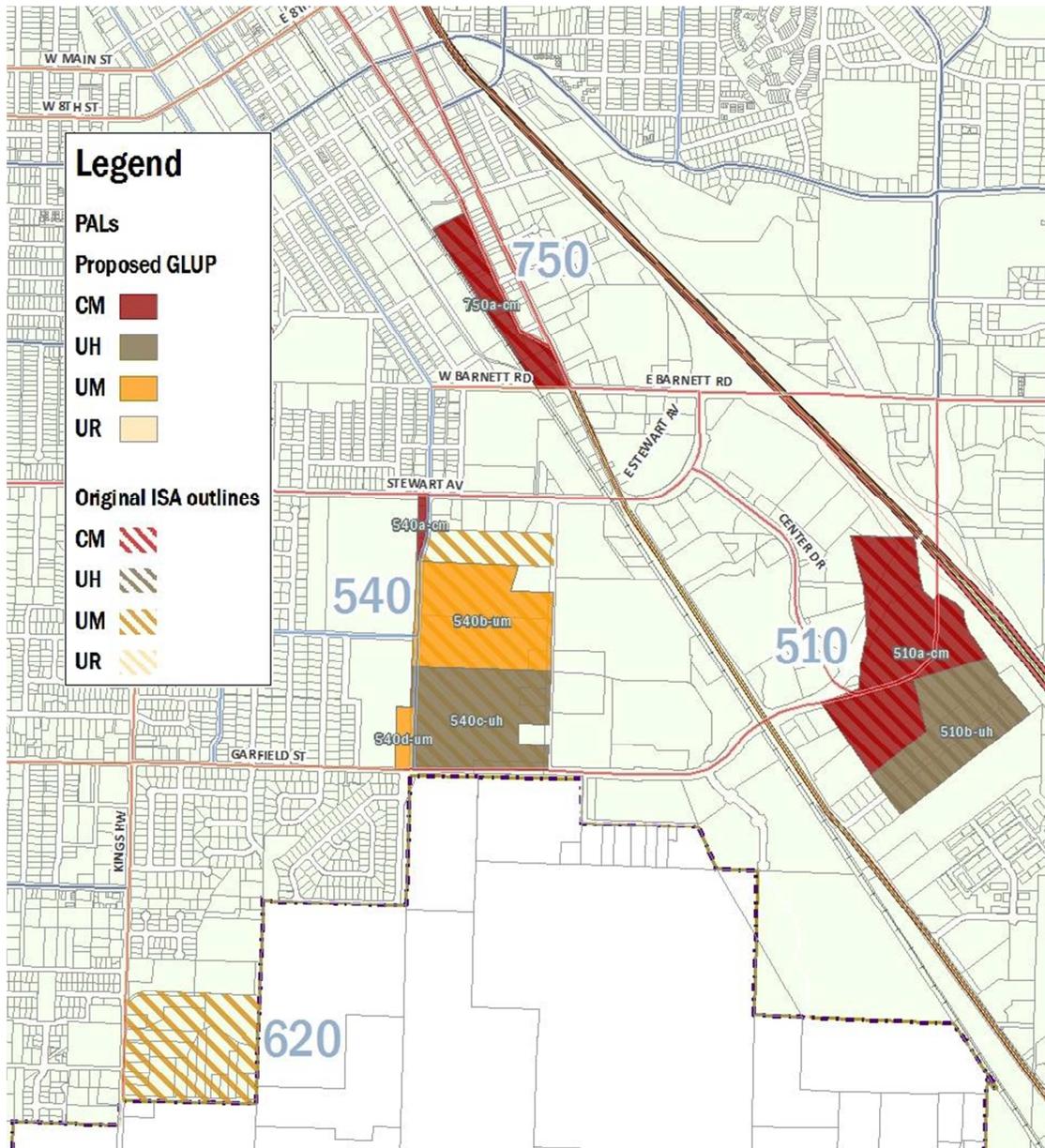


Exhibit A: Maps of the Proposed Amendment Locations, Map 4

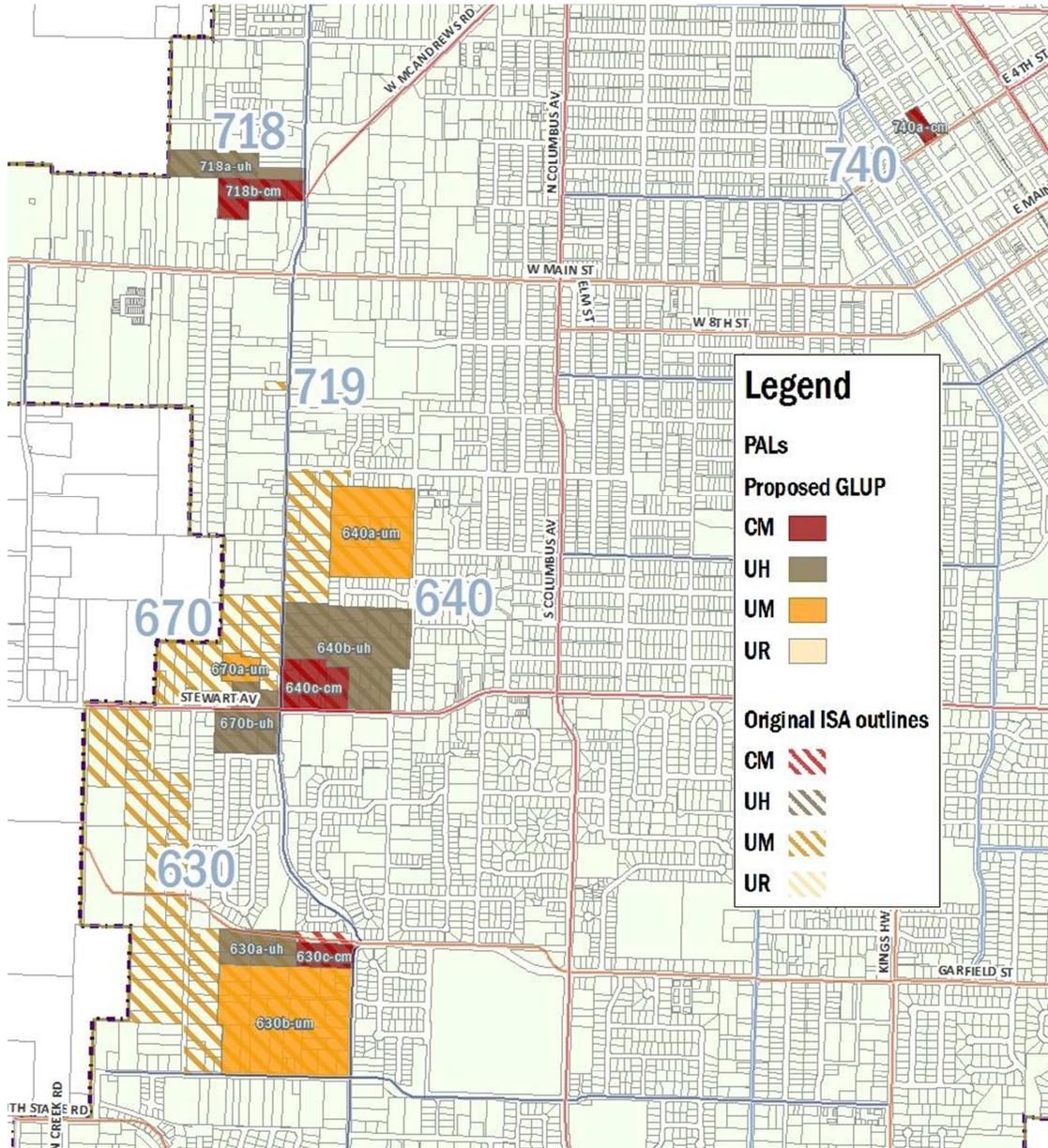
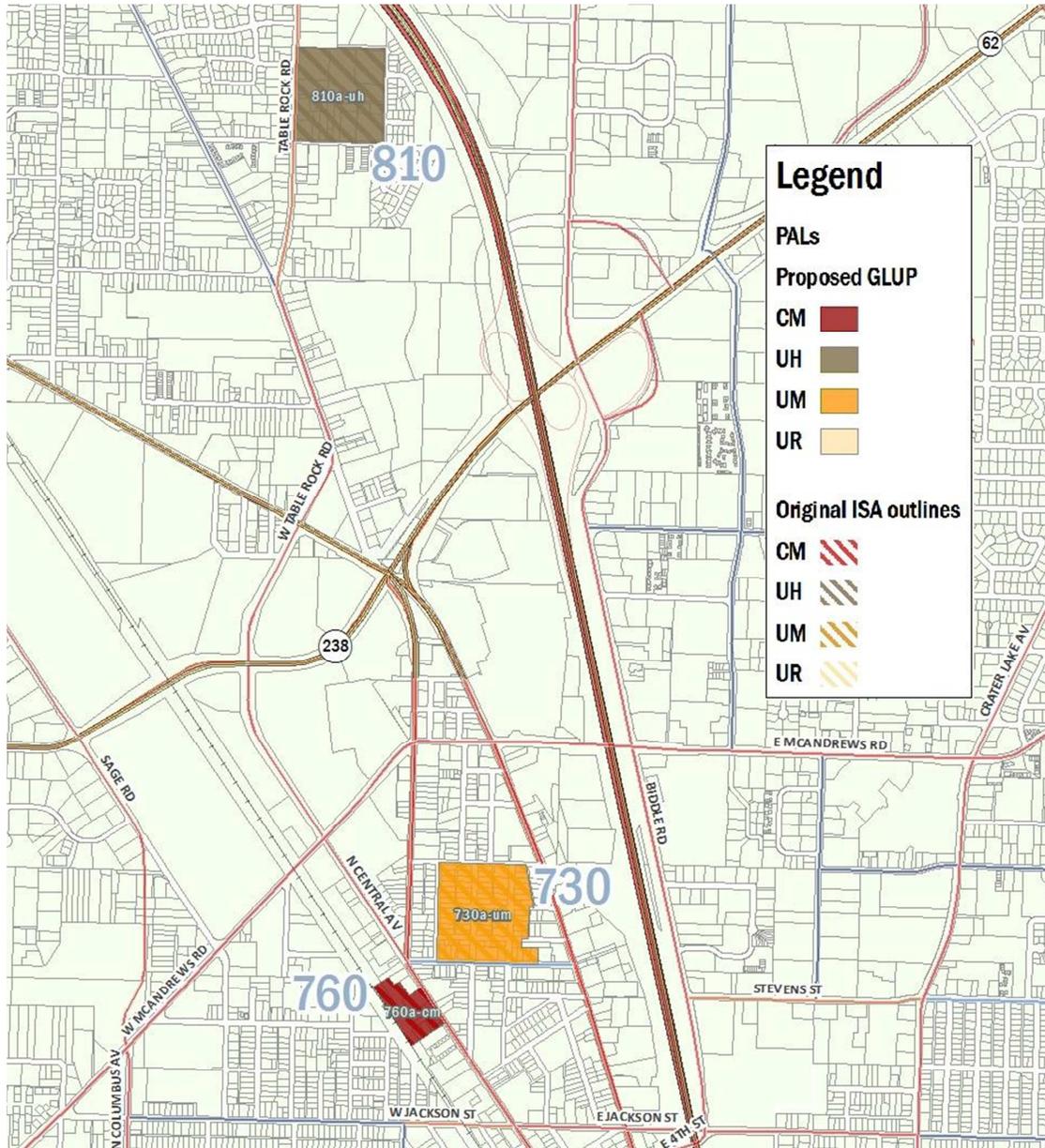


Exhibit A: Maps of the Proposed Amendment Locations, Map 5



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Exhibit B: Capacity Analysis of PAL lots

Map/lot no.	Site Address	Acreage	GLUP exist	GLUP prop	ISA	BLI	Acreage adjustments	note	PAL no.	sums by PAL
371W06200	1322 E VILAS RD	32.0	HI	CM	140	RED	26.6		140a-cm	77.6
371W062600	4545 CRATER LAKE HWY	20.6	HI	CM	140	VAC	20.6		140a-cm	
371W062607	CRATER LAKE HWY	30.5	HI	CM	140	VAC	30.5		140a-cm	
371W062613	CRATER LAKE HWY	0.9	HI	CM	140	developed	0.0		140a-cm	
371W08BA3500	3901 SPRINGBROOK RD	0.8	UR	UM	212	developed	0.4		212a-um	5.2
371W08BA3600	3913 SPRINGBROOK RD	0.8	UR	UM	212	developed	0.4		212a-um	
371W08BA3700	3935 SPRINGBROOK RD	0.8	UR	UM	212	developed	0.4		212a-um	
371W08BA3800	1850 COKER BUTTE RD	0.9	UR	UM	212	developed	0.5		212a-um	
371W08BA3900	1834 COKER BUTTE RD	0.9	UR	UM	212	developed	0.5		212a-um	
371W08BA4001	1804 COKER BUTTE RD	1.0	UR	UM	212	developed	0.5		212a-um	
371W08BA4100	1800 COKER BUTTE RD	1.2	UR	UM	212	PDR	1.0		212a-um	
371W08BA4200	1772 COKER BUTTE RD	1.8	UR	UM	212	PDR	1.5		212a-um	
371W08BA600	3868 SPRINGBROOK RD	4.8	UR	UH	212	PDR	4.5		212b-uh	4.5
371W08BD500	HONDELEAU LN	19.7	UR	UH	213	VAC	2.6	subset of the lot	213a-uh	2.6
371W08BD501	HONDELEAU LN	20.7	UR	UH	213	VAC	4.1	subset of the lot	213b-uh	4.1
371W08BC1800	3724 CRATER LAKE HWY	2.3	GI	CM	214	RED	1.2		214a-cm	6.3
371W08BC1801	CRATER LAKE HWY	2.0	GI	CM	214	developed	1.7		214a-cm	
371W08BC1900	3650 CRATER LAKE AVE	4.2	GI	CM	214	developed	3.5		214a-cm	
371W08C101	CRATER LAKE HWY	0.5	GI	UR	215	RED	0.1		215a-ur	0.1
371W08C202	CRATER LAKE HWY	0.6	GI	UR	215	developed	0.0		215a-ur	
371W08BC2802	CRATER LAKE AVE	0.8	GI	CM	215	unbuildable	0.0		215b-cm	22.3
371W08BC2804	CRATER LAKE AVE	0.8	GI	CM	215	RED	0.2		215b-cm	
371W08C200	3384 HWY 62	8.3	GI	CM	215	RED	6.9		215b-cm	

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Exhibit B: Capacity Analysis of PAL lots

Map/lot no.	Site Address	Acreage	GLUP exist	GLUP prop	ISA	BLI	Acreage adjustments	note	PAL no.	sums by PAL
371W08C201		0.3	GI	CM	215	developed	0.0		215b-cm	
371W08C300	3450 CRATER LAKE HWY	3.0	GI	CM	215	developed	2.5		215b-cm	
371W08C301	CRATER LAKE HWY	1.5	GI	CM	215	RED	0.5		215b-cm	
371W08C400	3366 CRATER LAKE HWY	2.0	GI	CM	215	developed	1.7		215b-cm	
371W08C401	CRATER LAKE HWY	0.1	GI	CM	215	RED	0.0		215b-cm	
371W08C500	3364 CRATER LAKE AVE	0.9	GI	CM	215	developed	0.9		215b-cm	
371W08C600	3300 CRATER LAKE AVE	6.9	GI	CM	215	RED	5.8		215b-cm	
371W08C700	3250 CRATER LAKE AVE	4.5	GI	CM	215	RED	3.8		215b-cm	
371W08C100	3414 CRATER LAKE AVE	4.5	GI	UH	215	RED	3.8		215c-uh	3.8
371W08C600	3300 CRATER LAKE AVE	0.0	GI	UH	215	developed	0.0		215c-uh	
371W08C800	CRATER LAKE AVE	0.1	GI	UH	215	developed	0.0		215c-uh	
371W051100	4100 CRATER LAKE AVE	2.0	GI	CM	216	developed	1.6		216a-cm	4.2
371W051200	4048 CRATER LAKE AVE	3.1	GI	CM	216	developed	2.6		216a-cm	
371W051300	4021 CRATER LAKE AVE 102	2.7	GI	CM	216	developed	0.0		216a-cm	
371W051400	1597 COKER BUTTE RD	0.1	GI	CM	216	developed	0.0		216a-cm	
371W17CB4500	2200 ROBERTS RD	6.3	UR	UM	250	developed	3.1		250a-um	3.1
371W32B3600	1365 CENTER DR	3.6	UR	CM	510	developed	3.0		510a-cm	27.1
371W32B3604	1405 CENTER DR	15.7	UR	CM	510	developed	13.0		510a-cm	
371W32B3605	BELKNAP RD	0.1	UR	CM	510	developed	0.0		510a-cm	
371W32B4708	CENTER DR	0.0	UR	CM	510	unbuildable	0.0		510a-cm	
371W32B4802	BELKNAP RD	0.1	UR	CM	510	developed	0.0		510a-cm	
371W32C200	SOUTH PACIFIC HWY	11.1	UR	CM	510	VAC	11.1		510a-cm	
371W32C100	SOUTH PACIFIC HWY	6.2	UR	UH	510	VAC	6.2		510b-uh	7.1

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Exhibit B: Capacity Analysis of PAL lots

Map/lot no.	Site Address	Acreage	GLUP exist	GLUP prop	ISA	BLI	Acreage adjustments	note	PAL no.	sums by PAL
371W32C1300	255 CHARLOTTE ANN RD	0.4	UR	UH	510	developed	0.0		510b-uh	
371W32C1400	275 CHARLOTTE ANN RD	0.4	UR	UH	510	developed	0.0		510b-uh	
371W32C1500	315 CHARLOTTE ANN RD	0.4	UR	UH	510	developed	0.0		510b-uh	
371W32C1501	319 CHARLOTTE ANN RD	0.4	UR	UH	510	developed	0.0		510b-uh	
371W32C1600	321 CHARLOTTE ANN RD	0.4	UR	UH	510	developed	0.0		510b-uh	
371W32C1700	365 CHARLOTTE ANN RD	0.4	UR	UH	510	developed	0.0		510b-uh	
371W32C1800	CHARLOTTE ANN RD	0.8	UR	UH	510	RED	0.2		510b-uh	
371W32C1900	435 CHARLOTTE ANN RD	0.4	UR	UH	510	developed	0.0		510b-uh	
371W32C2000	445 CHARLOTTE ANN RD	0.4	UR	UH	510	developed	0.0		510b-uh	
371W32C2100	465 CHARLOTTE ANN RD	0.8	UR	UH	510	RED	0.2		510b-uh	
371W32C2200	505 CHARLOTTE ANN RD	0.4	UR	UH	510	developed	0.0		510b-uh	
371W32C2201	535 CHARLOTTE ANN RD	0.4	UR	UH	510	developed	0.0		510b-uh	
371W32C2300	545 CHARLOTTE ANN RD	0.4	UR	UH	510	developed	0.0		510b-uh	
371W32C2301	555 CHARLOTTE ANN RD	0.3	UR	UH	510	developed	0.0		510b-uh	
371W32C2401	CHARLOTTE ANN RD	0.7	UR	UH	510	unbuildable	0.0		510b-uh	
371W32C2700	CHARLOTTE ANN RD	0.8	UR	UH	510	unbuildable	0.0		510b-uh	
371W32C2800	560 CHARLOTTE ANN RD	0.3	UR	UH	510	developed	0.0		510b-uh	
371W32C2900	558 CHARLOTTE ANN RD	0.3	UR	UH	510	developed	0.0		510b-uh	
371W32C3000	542 CHARLOTTE ANN RD	0.3	UR	UH	510	developed	0.0		510b-uh	
371W32C3100	524 CHARLOTTE ANN RD	0.5	UR	UH	510	developed	0.0		510b-uh	
371W32C3201	466 CHARLOTTE ANN RD	0.3	UR	UH	510	developed	0.0		510b-uh	
371W32C3202	480 CHARLOTTE ANN RD	0.4	UR	UH	510	developed	0.0		510b-uh	
371W32C3300	450 CHARLOTTE ANN RD	0.9	UR	UH	510	developed	0.0		510b-uh	

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371W32C3400	430 CHARLOTTE ANN RD	0.4	UR	UH	510	developed	0.0		510b-uh	
371W32C3500	410 CHARLOTTE ANN RD	0.5	UR	UH	510	developed	0.0		510b-uh	
371W32C3600	380 CHARLOTTE ANN RD	0.4	UR	UH	510	developed	0.0		510b-uh	
371W32C3700	358 CHARLOTTE ANN RD	0.4	UR	UH	510	developed	0.0		510b-uh	
371W32C3800	340 CHARLOTTE ANN RD	0.4	UR	UH	510	developed	0.0		510b-uh	
371W32C3900	320 CHARLOTTE ANN RD	0.4	UR	UH	510	developed	0.0		510b-uh	
371W32C4000	310 CHARLOTTE ANN RD	0.4	UR	UH	510	VAC	0.4		510b-uh	
371W32C4001	310 CHARLOTTE ANN RD	0.4	UR	UH	510	developed	0.0		510b-uh	
371W32C4100	240 CHARLOTTE ANN RD	0.5	UR	UH	510	developed	0.0		510b-uh	
371W31A3400	1100 S HOLLY ST	0.1	UR	CM	540	developed	0.0	added	540a-cm	0.2
371W31A3500	1118 S HOLLY ST	0.4	UR	CM	540	developed	0.1	added	540a-cm	
371W31A3600	1200 S HOLLY ST	0.2	UR	CM	540	developed	0.1	added	540a-cm	
371W31A3601	1180 S HOLLY ST	0.1	UR	CM	540	developed	0.0	added	540a-cm	
371W31A3800	1415 S HOLLY ST	12.1	UR	UM	540	RED	10.1		540b-um	21.1
371W31D401	MYERS LN	13.0	UR	UM	540	RED	10.8		540b-um	
371W31D500	MYERS LN	0.8	UR	UM	540	RED	0.2		540b-um	
371W31D400	1390 MYERS LN	23.3	UR	UH	540	RED	19.4		540c-uh	19.7
371W31D800	MYERS LN	1.0	UR	UH	540	RED	0.3		540c-uh	
371W31C300	200 GARFIELD ST	1.8	UR	UM	540	PDR	1.5	added	540d-um	1.5
372W35DA1300	1634 ORCHARD HOME DR	2.3	UR	UH	630	RED	0.6	west half	630a-uh	3.9
372W35DA1400	ORCHARD HOME DR	0.4	UR	UH	630	PDR	0.1	west half	630a-uh	
372W35DA1500	1652 ORCHARD HOME DR	2.3	UR	UH	630	PDR	1.0	west half	630a-uh	
372W35DB2501	THOMAS RD	3.3	UR	UH	630	PDR	0.8	subset of the lot	630a-uh	

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372W35DB801	THOMAS RD	2.7	UR	UH	630	PDR	1.4	subset of the lot	630a-uh	
372W35DB2501	THOMAS RD	3.3	UR	UM	630	PDR	1.1	subset of the lot	630b-um	16.5
372W35DC1900	2020 SUNSET DR	1.9	UR	UM	630	PDR	1.6		630b-um	
372W35DC2000	2010 SUNSET DR	0.9	UR	UM	630	RED	0.3		630b-um	
372W35DC400	1727 THOMAS RD	1.8	UR	UM	630	PDR	0.9	subset of the lot	630b-um	
372W35DC500	2087 WESTWOOD DR	0.5	UR	UM	630	developed	0.0		630b-um	
372W35DC700	1783 THOMAS RD	2.9	UR	UM	630	RED	1.4	subset of the lot	630b-um	
372W35DD100	1654 ORCHARD HOME DR	0.3	UR	UM	630	developed	0.0		630b-um	
372W35DD1000	1756 ORCHARD HOME DR	0.6	UR	UM	630	developed	0.0		630b-um	
372W35DD1200	1800 ORCHARD HOME DR	1.1	UR	UM	630	PDR	0.8		630b-um	
372W35DD1300	1800 ORCHARD HOME DR	0.6	UR	UM	630	RED	0.6		630b-um	
372W35DD1400	1802 ORCHARD HOME DR	0.5	UR	UM	630	developed	0.0		630b-um	
372W35DD200	1678 ORCHARD HOME DR	0.2	UR	UM	630	developed	0.0		630b-um	
372W35DD201	ORCHARD HOME DR	0.2	UR	UM	630	developed	0.0		630b-um	
372W35DD202	ORCHARD HOME DR	1.1	UR	UM	630	VAC	1.1		630b-um	
372W35DD2100	SUNSET DR	0.6	UR	UM	630	VAC	0.6		630b-um	
372W35DD2200	1920 SUNSET DR	1.0	UR	UM	630	RED	0.3		630b-um	
372W35DD2300	1938 SUNSET DR	0.9	UR	UM	630	developed	0.0		630b-um	
372W35DD2400	1946 SUNSET DR	1.5	UR	UM	630	PDR	1.2		630b-um	
372W35DD2500	1950 SUNSET DR	0.2	UR	UM	630	developed	0.0		630b-um	
372W35DD2600	1966 SUNSET DR	0.0	UR	UM	630	developed	0.0		630b-um	
372W35DD2700	1966 SUNSET DR	0.0	UR	UM	630	developed	0.0		630b-um	
372W35DD2800	1966 SUNSET DR	0.1	UR	UM	630	developed	0.0		630b-um	

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372W35DD2900	1970 SUNSET DR	1.3	UR	UM	630	PDR	1.0		630b-um	
372W35DD300	1980 WESTWOOD DR	2.0	UR	UM	630	RED	1.0		630b-um	
372W35DD3000	1980 SUNSET DR	2.0	UR	UM	630	RED	1.0		630b-um	
372W35DD400	2068 WESTWOOD DR	2.4	UR	UM	630	RED	1.3		630b-um	
372W35DD500	2073 WESTWOOD DR	1.0	UR	UM	630	RED	0.3		630b-um	
372W35DD600	2021 WESTWOOD DR	1.3	UR	UM	630	PDR	1.0		630b-um	
372W35DD700	1987 WESTWOOD DR	1.1	UR	UM	630	RED	0.4		630b-um	
372W35DD800	1957 WESTWOOD DR	1.0	UR	UM	630	RED	0.3		630b-um	
372W35DD900	1935 WESTWOOD DR	0.8	UR	UM	630	developed	0.0		630b-um	
372W35DA1300	1634 ORCHARD HOME DR	2.3	UR	CM	630	RED	0.6	east half	630c-cm	1.7
372W35DA1400	ORCHARD HOME DR	0.4	UR	CM	630	PDR	0.1	east half	630c-cm	
372W35DA1500	1652 ORCHARD HOME DR	2.3	UR	CM	630	PDR	1.0	east half	630c-cm	
372W26DD2600	800 CHERRY ST	1.0	UR	UM	640	developed	0.0		640a-um	7.7
372W26DD2700	820 CHERRY ST	1.0	UR	UM	640	developed	0.5		640a-um	
372W26DD2800	840 CHERRY ST	0.5	UR	UM	640	developed	0.2		640a-um	
372W26DD2900	790 CHERRY ST	2.5	UR	UM	640	PDR	2.2		640a-um	
372W35AA100	908 CHERRY ST	5.1	UR	UM	640	PDR	4.8		640a-um	
372W26DD2500	788 CHERRY ST	5.0	UR	UM	640	PDR	4.8		640b-uh	
372W35AA1400	1928 STEWART AVE	0.9	UR	UH	640	developed	0.5		640b-uh	
372W35AA1500	STEWART AVE	0.9	UR	UH	640	RED	0.3		640b-uh	
372W35AA1700	STEWART AVE	0.6	UR	UH	640	VAC	0.6		640b-uh	
372W35AA1800	1944 STEWART AVE	1.0	UR	UH	640	PDR	0.7		640b-uh	
372W35AA1900	1946 STEWART AVE	1.9	UR	UH	640	PDR	1.7		640b-uh	14.7

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372W35AA2400	1001 LOZIER LN	1.0	UR	UH	640	developed	0.5		640b-uh	
372W35AA2500	961 LOZIER LN	1.0	UR	UH	640	RED	0.3		640b-uh	
372W35AA2600	945 LOZIER LN	0.9	UR	UH	640	developed	0.4		640b-uh	
372W35AA2700	915 LOZIER LN	0.1	UR	UH	640	developed	0.0		640b-uh	
372W35AA2800	903 LOZIER LN	1.1	UR	UH	640	PDR	0.9		640b-uh	
372W35AA2900	825 LOZIER LN	1.0	UR	UH	640	developed	0.5		640b-uh	
372W35AA300	970 CHERRY ST	1.2	UR	UH	640	RED	0.4		640b-uh	
372W35AA400	978 CHERRY ST	1.5	UR	UH	640	RED	0.5		640b-uh	
372W35AA500	CHERRY ST	1.8	UR	UH	640	VAC	1.8		640b-uh	
372W35AA600	CHERRY ST	0.3	UR	UH	640	VAC	0.3		640b-uh	
372W35AA700	986 CHERRY ST	0.2	UR	UH	640	developed	0.0		640b-uh	
372W35AA800	CHERRY ST	5.0	UR	UH	640	RED	4.2		640b-uh	
372W35AD3000	1938 STEWART AVE	0.4	UR	UH	640	developed	0.0		640b-uh	
372W35AA2000	2110 STEWART AVE	0.8	UR	CM	640	developed	0.2		640c-cm	3.0
372W35AA2100	2140 STEWART AVE	1.9	UR	CM	640	PDR	1.7		640c-cm	
372W35AA2200	1145 LOZIER LN	1.4	UR	CM	640	PDR	1.1		640c-cm	
372W35AA2300	1045 LOZIER LN	0.4	UR	CM	640	developed	0.0		640c-cm	
372W35AB2500	1134 LOZIER LN	0.6	UR	UH	670	RED	0.2		670b-uh	6.0
372W35AB2600	2370 STEWART AVE	1.4	UR	UH	670	PDR	1.2		670b-uh	
372W35AC100	2355 STEWART AVE	0.7	UR	UH	670	developed	0.6		670b-uh	
372W35AC200	2335 STEWART AVE	2.9	UR	UH	670	VAC	2.9		670b-uh	
372W35AD1900	2325 STEWART AVE	1.3	UR	UH	670	PDR	1.1		670b-uh	
372W35AB2100	1012 LOZIER LN	2.2	UR	UM	670	RED	1.1		670a-um	1.1

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372W26AC1200	217 N ROSS LN	6.4	UR	UH	718	RED	5.3		718a-uh	5.3
372W26AC2200	161 N ROSS LN	2.6	UR	CM	718	PDR	2.3		718b-cm	4.6
372W26AC2900	161 N ROSS LN	1.8	UR	CM	718	VAC	1.8		718b-cm	
372W26AD4400	203 N ROSS LN	0.5	UR	CM	718	VAC	0.5		718b-cm	
372W24DA13400	302 BOARDMAN ST	0.2	UR	UM	730	developed	0.0		730a-um	0.0
372W24DA13500	305 EDWARDS ST	0.1	UR	UM	730	developed	0.0		730a-um	
372W24DA13600	327 EDWARDS ST	0.1	UR	UM	730	developed	0.0		730a-um	
372W24DA13700	309 BEATTY ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA13800	301 BEATTY ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA14600	304 BEATTY ST	0.6	UR	UM	730	developed	0.0		730a-um	
372W24DA14700	417 EDWARDS ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA1500	502 ALICE ST	0.1	UR	UM	730	developed	0.0		730a-um	
372W24DA15400	503 EDWARDS ST	0.1	UR	UM	730	developed	0.0		730a-um	
372W24DA15500	505 EDWARDS ST	0.1	UR	UM	730	developed	0.0		730a-um	
372W24DA15600	517 EDWARDS ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA15700	521 EDWARDS ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA1600	505 ALICE ST	0.1	UR	UM	730	developed	0.0		730a-um	
372W24DA1700	501 ALICE ST	0.1	UR	UM	730	developed	0.0		730a-um	
372W24DA1800	1006 NIANTIC ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA1900	1010 NIANTIC ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA2000	1014 NIANTIC ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA2100	1018 NIANTIC ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA2200	515 LIBERTY ST	0.1	UR	UM	730	developed	0.0		730a-um	

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372W24DA2300	513 LIBERTY ST	0.1	UR	UM	730	developed	0.0		730a-um	
372W24DA2400	1106 NIANTIC ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA2500	1112 NIANTIC ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA2600	1116 NIANTIC ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA2700	1120 NIANTIC ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA2800	1126 NIANTIC ST	0.1	UR	UM	730	developed	0.0		730a-um	
372W24DA2900	1130 NIANTIC ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA3000	1129 NIANTIC ST	0.4	UR	UM	730	developed	0.0		730a-um	
372W24DA3100	1119 NIANTIC ST	0.3	UR	UM	730	developed	0.0		730a-um	
372W24DA3200	1111 NIANTIC ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA3300	1107 NIANTIC ST B	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA3400	1103 NIANTIC ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA3500	1021 NIANTIC ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA3600	1015 NIANTIC ST	0.1	UR	UM	730	developed	0.0		730a-um	
372W24DA3700	1007 NIANTIC ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA3900	1001 NIANTIC ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA4000	416 ALICE ST	0.1	UR	UM	730	developed	0.0		730a-um	
372W24DA4100	ALICE ST	0.1	UR	UM	730	developed	0.0		730a-um	
372W24DA4200	408 ALICE ST	0.1	UR	UM	730	developed	0.0		730a-um	
372W24DA4300	318 BEATTY ST	0.1	UR	UM	730	developed	0.0		730a-um	
372W24DA4400	406 BEATTY ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA4500	408 BEATTY ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA4600	410 BEATTY ST	0.2	UR	UM	730	developed	0.0		730a-um	

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372W24DA4700	422 BEATTY ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA4800	404 LIBERTY ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA4900	502 BEATTY ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA5000	506 BEATTY ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA5100	510 BEATTY ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA5200	514 BEATTY ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA5300	518 BEATTY ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA5400	524 BEATTY ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA5600	528 BEATTY ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA5700	527 BEATTY ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA5800	519 BEATTY ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA5900	517 BEATTY ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA6000	513 BEATTY ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA6100	509 BEATTY ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA6200	505 BEATTY ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA6300	503 BEATTY ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA6400	423 BEATTY ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA6500	415 BEATTY ST	0.1	UR	UM	730	developed	0.0		730a-um	
372W24DA6600	411 BEATTY ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA6700	407 BEATTY ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA6800	381 ALICE ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA6900	398 ALICE ST	0.1	UR	UM	730	developed	0.0		730a-um	
372W24DA7000	366 ALICE ST	0.1	UR	UM	730	developed	0.0		730a-um	

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372W24DA7100	334 ALICE ST	0.1	UR	UM	730	developed	0.0		730a-um	
372W24DA7200	302 ALICE ST	0.1	UR	UM	730	developed	0.0		730a-um	
372W24DA7400	304 BOARDMAN ST	0.1	UR	UM	730	developed	0.0		730a-um	
372W24DA7500	402 BOARDMAN ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA7600	408 BOARDMAN ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA7700	410 BOARDMAN ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA7800	416 BOARDMAN ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA7900	420 BOARDMAN ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA8000	305 LIBERTY ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA8100	508 BOARDMAN ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA8200	512 BOARDMAN ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA8300	516 BOARDMAN ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA8400	520 BOARDMAN ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA8500	524 BOARDMAN ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W24DA8600	528 BOARDMAN ST	0.2	UR	UM	730	developed	0.0		730a-um	
372W25AA5700	132 W FOURTH ST	1.2	UH	CM	740	RED	0.4	correction area	740a-cm	0.4
372W25AA5701	132 W FOURTH ST	0.3	UH	CM	740	developed	0.0	correction area	740a-cm	
371W30CD7700	950 S CENTRAL AVE	0.2	HI	CM	750	developed	0.0	correction area	750a-cm	0.0
371W30CD7800	936 S CENTRAL AVE	0.4	HI	CM	750	developed	0.0	correction area	750a-cm	
371W30CD7900	924 S CENTRAL AVE	0.3	HI	CM	750	developed	0.0	correction area	750a-cm	
371W30CD8000	S CENTRAL AVE	0.2	HI	CM	750	developed	0.0	correction area	750a-cm	
371W30CD8100	916 S CENTRAL AVE	0.2	HI	CM	750	developed	0.0	correction area	750a-cm	
371W30CD8200	912 S CENTRAL AVE	0.1	HI	CM	750	developed	0.0	correction area	750a-cm	

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Exhibit B: Capacity Analysis of PAL lots

Map/lot no.	Site Address	Acreage	GLUP exist	GLUP prop	ISA	BLI	Acreage adjustments	note	PAL no.	sums by PAL
371W30CD8300	910 S CENTRAL AVE	0.7	HI	CM	750	developed	0.0	correction area	750a-cm	
371W30CD8400	828 S CENTRAL AVE	0.2	HI	CM	750	developed	0.0	correction area	750a-cm	
371W30CD8500	820 CENTRAL AVE B	0.5	HI	CM	750	developed	0.0	correction area	750a-cm	
371W30CD8600	820 S CENTRAL AVE	0.1	HI	CM	750	developed	0.0	correction area	750a-cm	
371W30CD8700	812 S CENTRAL AVE	0.7	HI	CM	750	developed	0.0	correction area	750a-cm	
371W30CD8800	724 S CENTRAL AVE	1.9	HI	CM	750	RED	0.0	correction area	750a-cm	
371W31AB200	1006 S CENTRAL AVE	0.4	HI	CM	750	developed	0.0	correction area	750a-cm	
371W31AB300	1000 S CENTRAL AVE	0.6	HI	CM	750	developed	0.0	correction area	750a-cm	
371W31AB400	1024 S RIVERSIDE AVE	0.8	HI	CM	750	developed	0.0	correction area	750a-cm	
371W31AB500	1068 S RIVERSIDE AVE	0.8	HI	CM	750	developed	0.0	correction area	750a-cm	
372W24DC702	929 N CENTRAL AVE	1.2	HI	CM	760	developed	0.0	correction area	760a-cm	0.0
372W24DD19100	909 N CENTRAL AVE	0.7	HI	CM	760	developed	0.0	correction area	760a-cm	
372W24DD19200	907 N CENTRAL AVE	0.4	HI	CM	760	developed	0.0	correction area	760a-cm	
372W24DD2700	827 N CENTRAL AVE	0.1	HI	CM	760	developed	0.0	correction area	760a-cm	
372W24DD2800	825 N CENTRAL AVE	0.1	HI	CM	760	developed	0.0	correction area	760a-cm	
372W24DD2900	823 N CENTRAL AVE	0.1	HI	CM	760	developed	0.0	correction area	760a-cm	
372W24DD3100	10 CLARK ST	0.2	HI	CM	760	developed	0.0	correction area	760a-cm	
372W24DD3200	4 CLARK ST	0.2	HI	CM	760	developed	0.0	correction area	760a-cm	
372W13AB1000	2825 CUMMINGS LN	2.0	UR	UH	810	RED	1.0		810a-uh	8.1
372W13AB1100	2902 TABLE ROCK RD	2.0	UR	UH	810	developed	1.0		810a-uh	
372W13AB1200	2848 TABLE ROCK RD	1.0	UR	UH	810	RED	0.3		810a-uh	
372W13AB1300	2810 TABLE ROCK RD	0.3	UR	UH	810	developed	0.0		810a-uh	
372W13AB1301	2818 TABLE ROCK RD	0.3	UR	UH	810	developed	0.0		810a-uh	

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Map/lot no.	Site Address	Acreage	GLUP exist	GLUP prop	ISA	BLI	Acreage adjustments	note	PAL no.	sums by PAL
372W13AB1302	2812 TABLE ROCK RD	0.2	UR	UH	810	developed	0.0		810a-uh	
372W13AB1303	2816 TABLE ROCK RD	0.2	UR	UH	810	developed	0.0		810a-uh	
372W13AB1400	555 MIDWAY RD	0.4	UR	UH	810	developed	0.0		810a-uh	
372W13AB1500	529 MIDWAY RD	0.4	UR	UH	810	developed	0.0		810a-uh	
372W13AB1600	2772 TABLE ROCK RD	0.2	UR	UH	810	developed	0.0		810a-uh	
372W13AB1700	519 MIDWAY RD	0.7	UR	UH	810	RED	0.2		810a-uh	
372W13AB400	2761 CUMMINGS LN	1.5	UR	UH	810	RED	0.5		810a-uh	
372W13AB401	611 MIDWAY RD	0.2	UR	UH	810	developed	0.0		810a-uh	
372W13AB402	2785 CUMMINGS LN	0.2	UR	UH	810	developed	0.0		810a-uh	
372W13AB500	597 MIDWAY RD	1.0	UR	UH	810	PDR	0.8		810a-uh	
372W13AB501	611 MIDWAY RD	0.3	UR	UH	810	VAC	0.3		810a-uh	
372W13AB600	571 MIDWAY RD	0.5	UR	UH	810	RED	0.1		810a-uh	
372W13AB700	569 MIDWAY RD	0.4	UR	UH	810	developed	0.0		810a-uh	
372W13AB701	561 MIDWAY RD	0.1	UR	UH	810	VAC	0.1		810a-uh	
372W13AB900	CUMMINGS LN	3.3	UR	UH	810	VAC	3.3		810a-uh	
372W13AB901	2805 CUMMINGS RD	1.0	UR	UH	810	RED	0.3		810a-uh	
371W21D102	2893 1/2 HILLCREST RD	72.7	UR	UM	930	RED	4.8	subset of the lot	930a-um	4.8
371W21D102	2893 1/2 HILLCREST RD	72.7	UR	CM	930	RED	9.1	subset of the lot	930b-cm	9.1
371W21D102	2893 1/2 HILLCREST RD	72.7	UR	UM	930	RED	6.6	subset of the lot	930c-um	6.6
371W21D102	2893 1/2 HILLCREST RD	72.7	UR	CM	930	RED	4.3	subset of the lot	930d-cm	4.3
371W20AB3500	1380 SPRINGBROOK RD	2.5	UR	CM	940	RED	1.3		940a-cm	1.3
371W20AC1700	2596 E MC ANDREWS RD	2.3	UR	UM	940	RED	2.3		940b-um	2.3
371W20BD1000	2460 E MC ANDREWS RD	13.5	UR	UM	950	RED	5.4	subset of the lot	950a-um	5.4

Exhibit C: ISA Qualitative Scores

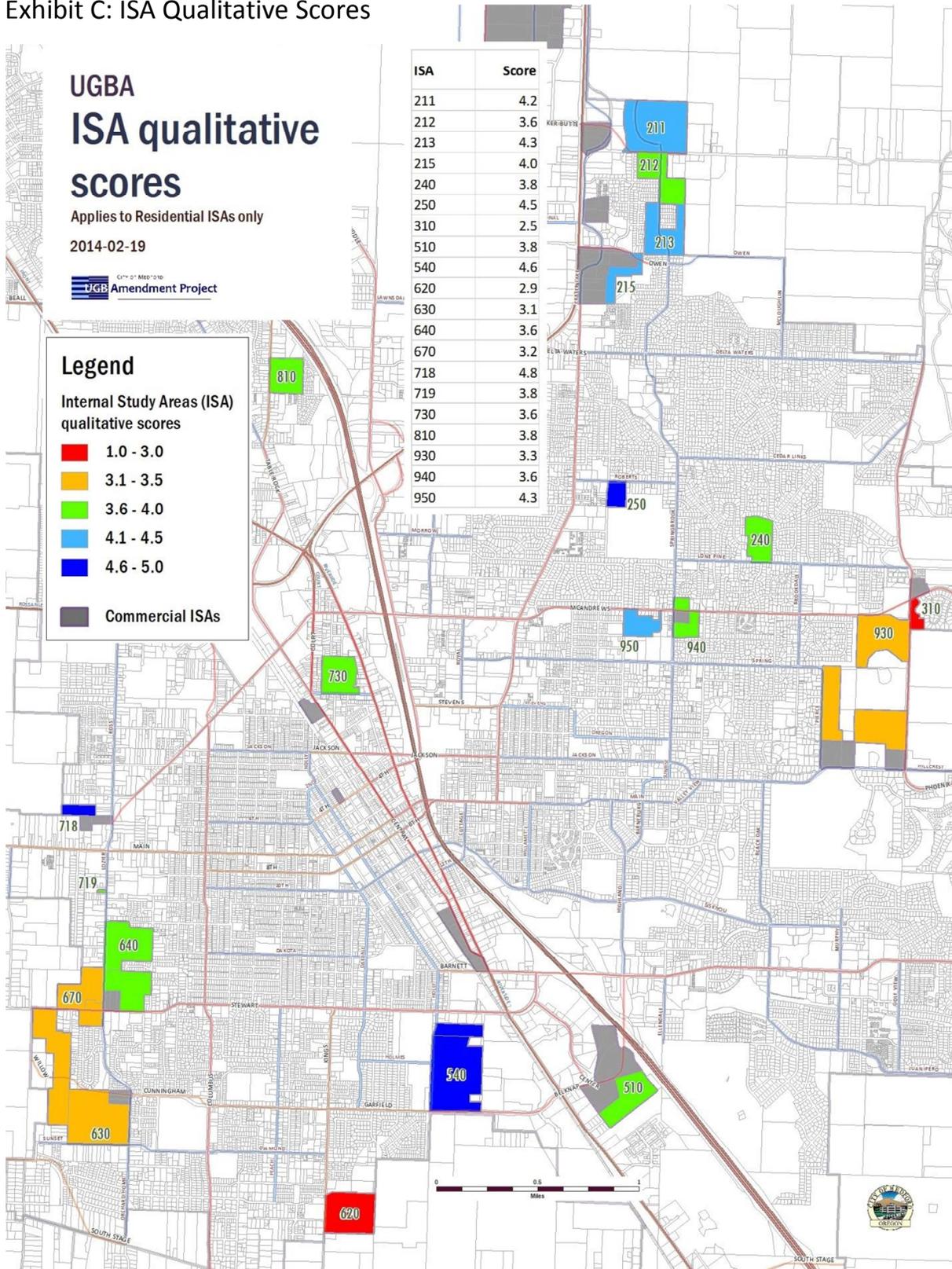


Exhibit D: PALs in GLUP context

