

STAFF REPORT
Proposed Milne Trust Plan Map Amendment

HEARING DATE: October 14, 2019

REPORT DATE: October 4, 2019

TO: Gresham Planning Commission

FROM: Ken C. Onyima, AICP, Senior City Planner

FILE NUMBER: PMA 19-26000311

PROPOSAL: The proposal is for a Plan Map Amendment from General Industrial (GI) to Corridor Mixed Use (CMU) for Tax Lot 01000 Section 1S3E05D comprising a total of 8.26 acres.

APPLICANT: James C. Milne Trust

REPRESENTATIVE: Peter Finley Fry

LEGAL DESCRIPTION: Section 1S3E05D Tax Lot 01000

LOCATION: NW corner of NW Division Street and Birdsdale Avenue

EXHIBITS:

- A. Vicinity Map
- B. Applicant's Narrative including:
 - Traffic Analysis Report
 - Economic Analysis
 - Sewer Analysis
- C. Title 4, Industrial and Other Employment Areas Map (2014)
- D. Dept. of Land Conservation & Development Letter

RECOMMENDATION: Staff recommends that the Planning Commission recommend approval of this Plan Map Amendment to the City Council.

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I. BACKGROUND INFORMATION

A. DESCRIPTION OF PROPOSAL AND HISTORY

The proposal would change 8.26 acres from the current land use designation of General Industrial (GI) to Corridor Mixed Use (CMU). The GI designation generally allows for industrial type uses, limited commercial uses and certain Institutional uses under the Special Use Review. The CMU designation primarily allows moderate density, multi-family residential uses, small scale commercial uses, mixed-use developments, and Institutional uses under the Special Use Review.

The property is located at the NW corner of NW Division Street and NW Birdsdales Ave. It is currently undeveloped and covered with vegetation. The site is bordered by LI designated properties to the north and west. NW Birdsdales forms the eastern border and NW Division Street forms the southern border. The property to the east is designated CMU while that to the south is designated Corridor Multi-family (CMF).

The subject site is partly designated Employment Land in the Title 4, Industrial and Other Employment Areas map published October 2014 (Exhibit C).

The applicant has pointed out that the proposed change in designation is being pursued in order to allow the development of the site with uses allowed under the CMU district including multi-family residential and commercial uses.

B. EXECUTIVE SUMMARY

The proposed Corridor Mixed Use (CMU) designation meets all four of the City's criteria for Plan Map amendment. This proposed change is anchored on the point that the subject property is poorly suited for industrial use due to access limitations and slopes exceeding those marketable for industrial users. The access limitations and slopes make the site better suited for residential and commercial development, thus supporting the housing and commercial policies of the Community Development Plan.

The properties to the east and south of the site have designations that allow multi-family residential development and some commercial development similar to those allowed under the CMU district. The City's residential and commercial land use policies would be promoted because the proposed change in designation supports an existing adjacent urban residential use while putting to use an otherwise underutilized property. Public facilities have sufficient capacity to serve residential and commercial uses and will only require standard extensions to serve the development. The traffic analysis report finds that the reasonable worst-case scenario in the proposed CMU land use district has a 184 PM peak hour trip generation increase from the current GI land use district.

However, the report concludes that the change will not significantly affect transportation system.

The applicant's application submittal demonstrates a general decrease in the demand for industrial land in the Portland metropolitan region. It demonstrates that the demand for shovel ready industrial land in the East Multnomah County subregion, and in the City of Gresham in particular, is being met by existing industrially designated sites in more competitive locations and with minimal transportation, water, sewer, or stormwater infrastructure barriers.

Staff's review of the applicant's materials concludes that the Airport Way/Columbia Corridor, the Port of Portland's Gresham Vista Business Park and the Springwater industrial area will remain the backbone of the City's long-term (20-year) industrial land reserve. The regional industrial lands capacity will remain unchanged. More precisely, the request to rezone the subject site from GI to CMU will not jeopardize the industrial land supply viability over the long term, plan year 2038, outlook.

The following factors lead staff to recommend amending the 8.26-acre property from GI to CMU designation:

1. The applicant's narrative and staff findings demonstrate compliance with City Comprehensive Plan Policies; Metro Title 1 (Housing Capacity), Title 4 (Industrial & Employment Lands), and Title 7 (Housing Choice) provisions of the Urban Growth Management Functional Plan; and Oregon Goal 9 "Economic Development" and Goal 10 "Housing".
2. The applicant's narrative and staff findings document that the proposed zone change will not result in a build-out scenario that exceeds existing and master planned transportation, water, sanitary sewer, and stormwater infrastructure capacity.
3. The zone change is limited to 8.26 acres of industrial land, a one percent cumulative reduction in the overall industrial land use inventory gross acreage in the city. 743.74 acres of the 752 acres of industrial use land will remain following the zone change.
4. There are topographic barriers on this site with an average grade of 7.9 percent along NW Division and 6.7% along NW Birdsedale Ave. The City's economic development division considers a 5 percent slope a threshold for a marketable industrial site.
5. The accessibility of the site does not offer competitive regional access to the interstate highway system.
6. The poor overall location of subject site in relation to key industrial sector amenities such as Portland Airport and Port of Portland water ports and freight railyards.

7. The site is immediately adjacent to existing CMU and CMF designated lands along its eastern and southern borders.

II. APPLICABLE COMMUNITY DEVELOPMENT CODE PROCEDURES

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|----|----------------------|---|
| A. | Section 11.0204 | Type III Procedures |
| B. | Section 11.0101 | Development Permit Application |
| C. | Section 11.0213-0214 | Referral and Review of Development Permit |
| D. | Section 12.0000 | Community Development Plan Map Amendments |

III. APPLICABLE COMMUNITY DEVELOPMENT PLAN POLICIES

- | | | |
|----|----------------|----------------------------------|
| A. | Section 10.014 | Land Use Planning |
| B. | Section 10.313 | Industrial Land Use |
| C. | Section 10.320 | Transportation Systems |
| D. | Section 10.330 | Public Facilities and Services |
| E. | Section 10.331 | Water Service |
| F. | Section 10.332 | Wastewater System |
| G. | Section 10.333 | Stormwater Drainage Management |
| H. | Section 10.335 | Fire and Police Protection |
| J. | Section 10.414 | Economic Development |
| K. | Section 10.600 | Residential Land Use and Housing |

IV. FINDINGS

The proposed Plan Map Amendment is consistent with all applicable criteria and policies of the Gresham Community Development Code (zoning regulations) and the Community Development Plan (comprehensive plan) as indicated in the following findings. The findings also document compliance with Oregon Statewide Planning Goals and Metro regional Urban Growth Management Functional Plan (UGMFP) regulations.

A. COMMUNITY DEVELOPMENT CODE PROCEDURES

1. **Section 11.0101 - Development Permit Application.** Staff has reviewed this application and finds that it includes the information needed to fully address the Plan Map Amendment criteria.
2. **Section 11.0204 - Type III Procedures.** This proposal will be considered by both the Planning Commission and the City Council at public hearings in accordance with provisions of this section. The City Council will act on a recommendation from Planning Commission.

3. **Section 11.0500 - Referral and Review of Development Permit Application.** This application has been routed to affected city, county, regional, and state agencies for review and comment. The application was submitted on July 26, 2019 and deemed complete on August 23, 2019.
4. **Section 12.0000 - Community Development Plan Map Amendments.** This proposal will be evaluated according to the Type III procedures and approval criteria contained in this section. Certain criteria outlined in this section of the Code must be addressed in order for an evaluation of the appropriateness of the request to be conducted. An applicant must demonstrate that:
 - (a) The proposed designation is consistent with the applicable policies and implementation strategies of the City's Community Development Plan. The applicant must demonstrate that the proposed designation complies with the appropriate locational criteria identified in the Community Development Plan.
 - (b) The proposed designation will not negatively impact existing or planned public facilities and services.
 - (c) In addition, the proponent shall demonstrate compliance with one of the following criteria:
 - (i) A mistake was made in the current designation. The applicant must identify a specific error made during the adoption process of the Community Development Plan that, if it had been brought to the attention of the council, would have influenced the council's decision of the appropriate designation
or,
 - (ii) The site is suitable for the proposed designation and there is a lack of appropriately designated alternative sites within the vicinity. The size of the vicinity will be determined on a case-by-case basis since the impacts of a proposed land use designation and its potential use vary. The factors in determining suitability are parcel size and location.

Criteria (a), (b), and (c)(i) have been addressed by the applicant.

B. COMMUNITY DEVELOPMENT PLAN POLICIES

The following are Community Development Plan Policies which relate directly to this proposal. The staff has reviewed the narrative provided by the applicant

and has made an evaluation of the proposal in light of applicable Comprehensive Plan Policies as follows:

Section 10.310 Land Use Policies:

Policy It is the City’s policy to ensure that an adequate supply of land exists for residential, commercial, office, institutional, industrial and open space needs.

Findings: The applicant referenced Metro’s 2018 Urban Growth Report (UGR) which finds that the Gresham area has a very limited inventory of vacant land for multi-family residential uses. According to the report, over 90% of the City’s multi-family land inventory has been developed. The proposed re-designation will increase the gross buildable area for residential and mixed use. The overall policy of ensuring that an adequate supply of land exists for residential and mixed use is likely to be enhanced by this 8.26-acre re-designation.

Based upon these findings, the proposal is in conformance with the Residential Land Use Policies of the City of Gresham Comprehensive Plan.

Section 10.313 - Industrial Land Use

Applicable policies with respect to Industrial Land Use are paraphrased here as follows:

Policy I Gresham shall ensure an adequate supply of ready to build employment lands. The City shall designate and maintain on its community development plan map the land base necessary for sustained and diverse economic development and job creation.

Policy VI Gresham shall be able to respond proactively to larger-scale economic development opportunities by having appropriately zoned, ready-to-build industrial/business park sites of appropriate size and location.

Policy VIII Gresham shall regularly update its industrial business park land supply. The City shall consider re-designating lands that cannot practicably be developed for these uses within the planning period.

Policy X Gresham shall manage its industrial and employment lands to prevent inappropriate and unrelated retail and office land conversion. The City shall comply with or exceed provisions required by Metro Title 4 (Industrial and Employment Lands) relative to retail and professional service limits.

Findings: The applicant’s narratives and findings touched on the above policies. Implementation strategies of the above policies include encouraging the maintenance of large industrial tracts (20+ acres) which exist north of

Sandy Blvd. for large scale, planned industrial development. Others are that the City will annually assess the supply of serviceable sites for industrial development with an eye to amend the land use map to re-designate more serviceable land for industrial development. This proposed re-designation does not involve a parcel north of Sandy Blvd. and is less than the large tract (20+ acres) that the policy intends to preserve. Furthermore, based on the surrounding districts and existing uses, this 8.26-acre industrial property does not appear to be serviceable for industrial use purposes. Changing the district from the current GI to CMU will match its use with the rest of the residential uses to the east and west.

The argument that the site does not represent a strong industrial location based on scale as well as the poor access of the site, particularly the distance from I-84 fits well with the industrial land use policy.

The review of the zoning of this parcel is consistent with Policy VIII that the City regularly update its industrial business park land supply and consider re-designating lands that cannot practicably be developed for these uses within the planning period. Consistency with Policy X, regarding Metro Title 4 compliance, is addressed as part of this land use review and staff report.

Based upon these findings, this proposal is found to be generally in conformance with the Industrial Land Use Policies found in the City of Gresham Community Development Plan. The opportunity to function as an Employment Overlay still exists with the CMU designation.

Section 10.320 - Transportation System

It is the general policy of the City to implement and maintain a balanced, coordinated, safe and efficient transportation system.

Findings The change in land use designation will not create a significant change in the transportation system of the immediate area or of the city. Development Engineering, and the City's Transportation Planner have noted that they have no concern regarding this change in designation.

According to the analysis done by Clemow Associates on behalf of the applicant, there will be a net increase in trips as a result of the proposed zone change. However, the report concludes that adequate capacity exists on the transportation system in the area that the increase will not have a significant effect on the system.

Based upon these findings, the proposal has been found to be in compliance with the Transportation Policies.

Section 10.330 - Public Facilities and Services

It is the City's general policy that development will coincide with the provision of adequate public facilities and services including access, drainage, water and sewerage services.

Section 10.331 - Water Service

It is the policy of the City to provide municipal water service to all users within the corporate limits of Gresham.

Findings The change in land use designation will not create a significant change in the City's water service capacity, per Development Engineering's findings below.

Section 10.332 – Wastewater System

It is the policy of the City to provide municipal sanitary sewer service to all users within the Gresham sanitary sewer drainage basin.

Findings The change in land use designation will not create a significant change in the City's sanitary sewer capacity, per the analysis done by Luke Lappin, PE on behalf of the applicant and the City's Development Engineering's findings.

Section 10.333 – Stormwater Drainage Management

It is the City's policy to establish a drainage management system, which controls the amount and rate of surface water runoff; protects property from runoff related damage; and controls pollution of receiving streams.

Findings The change in land use designation will not create a significant change in the City's stormwater/drainage capacity, per Development Engineering's findings below.

Section 10.335 - Fire and Police Protection

It is the policy of the City of Gresham to provide adequate and cost-effective fire and police protection, which ensures a safe living environment and is responsive to the needs of the citizens of Gresham.

Findings Development Engineering has noted that this proposal will not have a negative effect on the noted public facilities.

The Public Safety Official (Fire Marshal) has expressed no concerns regarding this proposal.

Based upon these findings, this proposal has been found to be in compliance with the Public Facilities policies of the City of Gresham Comprehensive Plan.

Section 10.414 - Economic Development

Policy I It is the policy of the City to promote diversification of the community's economic base by promoting business retention and expansion, business recruitment and marketing.

Findings The City's Economic Development team expressed no concern with the proposed loss of the industrial land based on the reasons stated by the applicant. It is anticipated that the effect on the overall economic development of Gresham will be negligible at the worst and positive at the best. The Johnson Economics report demonstrates the topographical, locational, economic trend, and access barrier reasons why this site is not one with great economic development potential.

Based upon these findings, the proposal has been found to be in compliance with the Economic Development policies of the Comprehensive Plan.

Section 10.311 & 10.600 – Residential Land Use and Housing

Housing Opportunities Policies

Policy I Provide a full range of housing types and sizes that reflect the needs of Gresham's citizens through all life stages and circumstances.

Staff Finding: The proposal has the potential of adding 157 attached dwelling units to the City's housing supply. Relying on Metro's Urban Growth Report, the applicant notes that Metro anticipates that the region is projected to have adequate housing capacity, particularly for multi-family residential. This might suggest that the proposed change from industrial land use to a land use district that allows multi-family dwellings (CMU) is not necessary. However, the Forecast 2010-2038 Price Appreciation by Housing Type noted in the Johnson Economics Analysis (contained in Exhibit B) shows that the escalation rate for single-family residential is expected to outpace multi-family residential, reflecting the supply relative to the demand for each product type. Over time this will increase the importance of multi-family residential development to meet affordability requirements.

The introduction of 8.26 additional acres of CMU land at a maximum density of 24 dwelling units per acre will have the effect of increasing the supply of multi-family residential units, thus helping to address the affordability requirements.

Policy II Support the development of housing that reflects the square footage and number of bedrooms needed by the full range of family sizes from singles to large families.

Staff Finding: The proposal will add additional multi-family attached dwelling units. Family sizes from single to large families are generally drawn to this housing type.

Economic Development Policies (Housing Investments)

Policy I Provide opportunities for mixed use developments.

Staff Finding: The proposal will result in a land use district that permits both residential and a variety of commercial uses in furtherance of this policy.

Policy III Promote a mix of housing types where appropriate.

Staff Finding: The proposal provides opportunity for a mix of housing types that includes duplexes, attached single-family homes and multi-family attached units in support of the housing type policy.

b. The proposed designation will not negatively impact existing or planned public facilities and services.

Staff Finding: The applicant submitted a Traffic Analysis report, prepared by Christopher Clemow of Clemow Associates, a Professional Transportation Engineer (OR 18300PE), concluding that there will be no negative impact on existing transportation infrastructure. The trip generation analysis forecasts a net increase in trip generation by 184 PM peak hour trips. Even with this increase the report concludes that the land use district change will not significantly affect the transportation system.

The applicant also provided a Sewer Analysis report prepared by Luke Lapin, PE of Pioneer Design Group. The analysis concludes that there is no surcharge predicted in the system downstream of the property in question under buildout conditions. This project does not cause any upstream or downstream capacity deficiencies in the collection system.

These conclusions are further supported by the comments from the internal reviewing agencies of the city. Based on comments from the City's Department of Environmental Services, Development Engineering division, the proposed CMU designation is not expected to negatively impact public facilities. Development of the site will be subject to review of applicable design criteria and the public works standards.

Conclusion: Based on these findings, the proposed CMU designation is not expected to have negative impacts on public facilities, and therefore is consistent with Criteria 2 for Plan Map amendments.

Section 10.014 – Land Use Planning

Policy XVI Amendments to Gresham’s Comprehensive Plan Map shall be subject to six additional criteria.

- a) Public facility capacity
- b) Avoid negative impact to public facilities
- c) Compatibility with surrounding uses and environmental conditions
- d) Development compliant with all applicable regulations and standards
- e) Demonstration of inadequate inventory of developable land with proposed use
- f) Fulfill a proven community need

Findings: The proposal complies with each of these additional criteria as demonstrated in this staff report. Documentation of sufficient infrastructure capacity and no negative impact to existing or planned public facilities is provided. The proposed CMU will be compatible with existing CMU to the east and CMF to the south. The community need being provided is additional housing as well as commercial stock.

c. *In addition, the proponent shall demonstrate compliance with one of the following criteria:*

(i) *A mistake was made in the current designation. The applicant must identify a specific error made during the adoption process of the Community Development Plan that, if it had been brought to the attention of the council, would have influenced the council's decision of the appropriate designation,*

Or,

(ii) *The site is suitable for the proposed designation and there is a lack of appropriately designated alternative sites within the vicinity. The size of the vicinity will be determined on a case-by-case basis since the impacts of a proposed land use designation and its potential use vary. The factors in determining suitability are parcel size and location.*

The applicant asserts compliance with criteria (c)(i). The narrative argues that a mistake was made when the site was designated as an industrial site. According to the applicant, the site shouldn’t have been designated as

industrial due to the topography that averages 7.2% which is inconsistent with many industrial users that require a 5% slope or less on a site. The marketability of an industrial site, this one included, is greatly affected by topography. It is on record that the Economic Development Division of the City has assisted in marketing the property for industrial use in the past without much success.

Re-designating this property is therefore in line with the Industrial Land Use Policy #8 that states:

Gresham shall regularly update its industrial and business park land supply. The City shall consider re-designating lands that cannot practically be developed for these uses within the planning period.

Additional assignment of error stems from the fact that the site is physically separated from the industrial lands to the west and north by Fairview/Gresham pedestrian/bicycle pathway, wetlands, stormwater treatment facility and power transmission lines. Furthermore, the site abuts residential neighborhoods on the east and south boundaries making more suitable for residential/mixed use district than industrial district. Finally, the site has no access to an interstate freight system and limited access to freight arterials. The combination of all these factors support the assertion that a mistake was made in designating the site as an industrial district.

Conclusion: Based on these findings and those of the applicant's Economic Analysis and other application narratives, the site is suitable for the CMU designation and a mistake was made in the current GI designation. The application is consistent with Criteria 3 for Plan Map amendments.

(d) The proposed designation is consistent with the Metro Urban Growth Management Functional Plan (UGMFP).

The applicant's findings document the proposal's consistency with Title 1, Title 4, and Title 8 of the Metro Urban Growth Management Functional Plan (UGMFP) published April 16, 2018.

Metro Title 1 (Housing Capacity)

The applicant's conclusion with respect to Title 1, which requires the City of Gresham to maintain or increase its housing capacity, is that the proposal will increase the City's multi-family attached housing capacity in the city considering the fact that the city is down to the last 10% of its land supply for multi-family residential uses.

Metro Title 4 (Industrial and Other Employment Areas)

Title 4 requires the City to provide and protect a supply of sites for employment by limiting the types and scale of non-industrial uses in

Regionally Significant Industrial Areas (RSIA's). The 8.26-acre site is not located within an RSIA. Rather it is partly located within the Employment Area Overlay.

Section 3.07.440 Protection of Employment Areas states that:

(a) Except as provided in subsections (c),(d), and (e), in Employment Areas mapped pursuant to Metro Code section 3.07.450, cities and counties shall limit new and expanded commercial retail uses to those appropriate in type and size to serve the needs of businesses, employees and residents of the Employment Areas.

(b) Except as provided in subsections (c), (d) and (e), a city or county shall not approve a commercial retail use in an Employment Area with more than 60,000 square feet of gross leasable area in a single building, or commercial retail uses with a total of more than 60,000 square feet of retail sales area on a single lot or parcel, or on contiguous lots or parcels, including those separated only by transportation right-of-way.

In the CMU district, the maximum building footprint permitted for any building occupied entirely by commercial use or uses shall be 20,000 square feet. The CMU district offers opportunity for employment in the event of a commercial or mixed-use development and will be required to meet the above maximum square feet requirement for commercial uses. Of note is that the exceptions allowed under (c), (d) and (e) do not apply to Gresham because the city is not listed as one of the applicable jurisdictions in Table 3.07-4.

Title 8 (Compliance Procedures)

Title 8 of the UGM Functional Plan provides that at least 35 days prior to the first evidentiary hearing on an amendment to the comprehensive plan or land use regulation that a copy of the proposal be submitted to Metro for review. The amendment was submitted to Metro on September 9, 2019, which is 35 days prior to the October 14, 2019 Planning Commission hearing, the first hearing. Metro staff is being provided this staff report one week in advance of the hearing.

Conclusion

The proposal is consistent with Titles 1, 4, and 8 of the UGM Functional plan as demonstrated in the narratives and the supporting reports. There is no substantial negative impact on employment generation; housing capacity will be increased, and proper notice has been given.

V. OTHER COMMENTS

OREGON DEPARTMENT OF LAND CONSERVATION AND DEVELOPMENT (Jennifer Donnelly, Regional Representative)

DLCD submitted comments on the application dated September 25, 2019 and included as Exhibit . The comment states that it is not clear in the analysis provided by the applicant that Gresham's 20-year supply of employment land will not be negatively affected by the proposed application. It also questions the proposal's compliance with Metro's title 4: 3.07.420 Protection of Regionally Significant Industrial Areas (RSIA).

The 1.08% reduction that results from rezoning of this non-viable industrial site is negligible going by the regional trend that anticipates a net decrease of 9,000 industrial jobs during the 2018 through 2038 time period. As a result, the UGR finds no need for additional industrial land to support employment growth at a regional level. Gresham being a part of the region under review, the trend should be no different. On page 10 of the Economic Analysis Report provided by the applicant (contained within Exhibit B), the applicant noted that within the City of Gresham, over 2,000 acres of land is zoned for industrial uses, of which 752 acres is currently categorized as undeveloped not counting the industrial areas in the Springwater Corridor. This represents about 28% of the 2,681 acres of inventory contained in Metro's UGR report which has been characterized as being in excess of the identified need for industrial land in the Johnson Economics Report and the Metro UGR report. A considerable amount of this undeveloped industrial acreage is prime industrial property, much of which is within the vicinity I-84 and is considerably more marketable than the subject site.

On the issue of compliance with Metro's title 4: 3.07.420 Protection of Regionally Significant Industrial Areas (RSIA), the site is not an RSIA site. Rather is an Employment Area as shown in Exhibit C, Findings related to Employment Area are addressed in this report.

Staff concludes that both concerns raised in the memorandum from DLCD have been addressed and found satisfied by the proposed plan map amendment.

DEVELOPMENT ENGINEERING COMMENTS (Contact Al Hagg, 503-618-2419)

There is no development action proposed with this Plan Map Amendment. There are no public facilities proposed or affected by this Plan Map Amendment. Any Development Engineering Conditions of Approval will relate to subsequent development likely to follow this zoning change.

CITY TRANSPORTATION PLANNING COMMENTS (Contact Jay Higgins, 503-618-2215)

Project Description: GI zoned property at corner of SE Birdsdale and SE Division
Plan Map Amendment to change zoning from General Industrial to Commercial Mixed Use.

Traffic Impact Analysis

Transportation Engineering has reviewed the Traffic Impact Analysis for the zone change. While traffic does increase under the proposed zoning all studied traffic intersections perform within City standards.

Right of Way Dedication & Frontage Improvements

No dedication or frontage improvements are required for this Plan Map Amendment. At the time of development transportation impacts will be evaluated and street dedication and frontage improvements required.

Recommendation

This application can be approved as submitted.

FIRE COMMENTS (Contact Mike Kelly, 503-618-2573)

This application does not deal with specific development. I will have comments when development application is submitted.

VI. CONCLUSION

The proposed Plan Map amendment is consistent with applicable criteria and policies of the Community Development Plan, as indicated by findings contained in Section IV of this report.

VII. RECOMMENDATION

Staff recommends that the Planning Commission recommend approval of this Plan Map Amendment to the City Council.

End of Staff Report

