PROPOSED AMENDMENTS TO GOSHEN PROPOSAL

EXHIBIT A to ORD. PA 1282 – COMPREHENSIVE PLAN AMENDMENT

New Goal 2, Policy 11, subsection (d):
The primary purpose of the General Industrial zone is to provide and protect large sites for urban levels of labor intensive, rail dependent manufacturing uses that pay high wages.

EXHIBIT A to ORD. 13-2 – ZONING CODE AMENDMENTS

**LC 16.280(1):**
General Industrial (GI): The purpose of this zone is to provide opportunities for industrial uses that create jobs that pay no less than 150% of the median wage, which are essential to the development of a balanced economic base in an industrial environment with a minimum conflict between industrial uses and non-industrial uses. Additionally, it is the primary purpose of the GI zone to create a job density of 8-13 jobs per net buildable acre with uses that focus on rail dependent uses.

**LC 16.280(9)(g)(iii):**
Industrial Service uses in GI zone. Industrial service uses are only allowed in the GI zone when secondary and subordinate to an approved primary use, and when the use is demonstrated to satisfy the following:

(aa) Create a job density of 8-13 jobs per net buildable acre at build out of the proposed use.

**LC 16.280(9)(g)(vii):**
Warehouse, Freight Movement, and Distribution. Warehouse, Freight Movement, and Distribution uses are only allowed in the GI zone when secondary and subordinate to an approved primary use, and when the use is demonstrated to satisfy the following:

(aa) Create a job density of 8-13 jobs per net buildable acre at build out of the proposed use.

**FINDINGS**

Revise pages 8 and 10 to reflect that the target overall job density for Goshen is 10 employees per acre, yielding 3,100 jobs, with GI zone net job density of 13 EPA, and LI zone net job density of 16 EPA.
In response to the 1000 Friends or Oregon testimony the employment density requirement has been added for warehouse/distribution uses in addition to already being included for Industrial Service uses.

2. Should the employment density requirement be 13 jobs per net acre or some other threshold, such as 5/8 jobs per acre (gross/net) for the General Industrial zone be required?

The issue of employment density is discussed in the findings document on page 8. Mia Nelson indicates in her written testimony that the County promised 13 jobs per acre. It is not clear where or when the County made this "promise". A previous version of analysis associated with this issue may have referenced 13 jobs per acre, however, the current findings state on page 8:

"It is estimated that between 2,800 and 3,100 industrial jobs will be created in Goshen, based on an average job density of 10 jobs per acre at full build-out. This estimate relies on an employment density of 16-20 employees per acre (EPA) in the light industrial zone and 5-8 EPA in the heavy industrial zone. These ranges are derived from an evaluation of comparable industrial areas in the City of Eugene, as assessed in the Eugene Comprehensive Lands Assessment (ECLA) pre-policy analysis document, dated June 2012. In the ECLA, Eugene’s heavy industrial job density was estimated at 8 employees per net acre, or 5 employees per gross acre. Light industrial zoned property was estimated at 16 employees per net acre."

Staff is proposing some changes to the findings (cited above) in response to the employment density discussion, which are reflected in Attachment 2 to this memo, the “REVISED Exhibit C to Ordinance No. PA 1282 Findings and Reasons document, Board of County Commissioners Deliberation Draft dated 4/2/13 (shown with track changes)".

The findings state that the 10 EPA is a goal for the entire 316 acre area within Goshen considering higher density (16 net EPA) in the proposed Light Industrial zone, and lower density (8 net EPA) in the General Industrial zone. The 10 EPA in this case would be based on a gross acreage number. Therefore, the 13 EPA is an average net acreage number for the entire area. The conversion from gross to net is difficult to calculated not knowing exactly how many acres (net) would ultimately be developed out of the 316 gross acres.

As an example, assuming a 35 acre (gross) site in the GI zone and a 10 acre site in the LI zone, the following employees per acre (EPA) would result based on two different levels of net developable acres:

<table>
<thead>
<tr>
<th>Zone</th>
<th>Acres gross</th>
<th>EPA gross</th>
<th>Number of employees</th>
<th>Acres net 1</th>
<th>EPA net 1</th>
<th>Acres net 2</th>
<th>EPA net 2</th>
</tr>
</thead>
<tbody>
<tr>
<td>GI zone</td>
<td>35</td>
<td>5</td>
<td>175</td>
<td>30</td>
<td>5.8</td>
<td>20</td>
<td>8.8</td>
</tr>
<tr>
<td>LI zone</td>
<td>10</td>
<td>13</td>
<td>130</td>
<td>8</td>
<td>16.3</td>
<td>6</td>
<td>21.7</td>
</tr>
<tr>
<td>Ave. EPA</td>
<td>6.7</td>
<td></td>
<td></td>
<td></td>
<td>8.0</td>
<td></td>
<td>11.7</td>
</tr>
</tbody>
</table>

The Goshen Region Employment and Transition Plan - BCC agenda cover memo

Page 5 of 7
RECAP OF METRO 1999 EMPLOYMENT DENSITY STUDY

<table>
<thead>
<tr>
<th>Square Feet Per Employee</th>
<th>EPA @ 0.15 FAR</th>
<th>EPA @ 0.20 FAR</th>
<th>EPA @ 0.25 FAR</th>
</tr>
</thead>
</table>

UNLIKELY or NOT ALLOWED
- Transportation & Warehousing: 3290, 2, 3, 3
- Paper & Allied: 1600, 4, 5, 7
- Wholesale Trade: 1390, 5, 6, 8
- Textile & Apparel: 930, 7, 9, 12

LIKELY GOSHEN BUSINESSES
- Furniture; Clay, Stone & Glass; Misc.: 760, 9, 11, 14
- Chemicals, Petroleum, Rubber, Leather: 720, 9, 12, 15
- Transportation Equipment: 700, 9, 12, 16
- Lumber & Wood: 640, 10, 14, 17
- Food & Kindred Products: 630, 10, 14, 17
- Communications & Public Utilities: 460, 14, 19, 24
- Primary & Fabricated Metals: 420, 16, 21, 26
- Electrical Machinery & Equipment: 400, 16, 22, 27
- Machinery Equipment: 300, 22, 29, 36
AVERAGE (likely only): 13, 17, 21

ASSESSMENT OF ACTUAL GOSHEN DEVELOPMENT POTENTIAL

<table>
<thead>
<tr>
<th>GI Zone</th>
<th>Gross acres</th>
<th>Employees</th>
<th>Gross EPA</th>
<th>Net EPA After Subtractions</th>
</tr>
</thead>
<tbody>
<tr>
<td>LI Zone</td>
<td>83</td>
<td>950</td>
<td>11.4</td>
<td>16.0</td>
</tr>
<tr>
<td>TOTAL/ AVERAGE</td>
<td>316</td>
<td>3110</td>
<td>9.8</td>
<td>13.8</td>
</tr>
</tbody>
</table>

Net-to-Gross Subtractions
- 15% Infrastructure, etc (Eugene 15%, is often higher)
- 25% Wetlands & other unbuildable land

Goshen has 120+ acres of hydric soils (likely wetland), on the three large parcels alone
120 acres is 38% of the total land area of Goshen