

CITY OF TURNER

Amended

Review of:

**2021-2041 Turner Housing Needs Analysis
Turner Comprehensive Plan Text Amendments
Turner Comprehensive Plan and Zoning Map Amendments
Turner Land Use Development Code Text Amendments**

City Council Review on
October 28, 2021
And
March 10, 2022

**File No. 21-02 & 21-03
Housing Needs Analysis and UGB Expansion**

REQUESTED ACTION:

File 21-02 reviews the Housing Needs Assessment for the City of Turner, which will then become Appendix 2 in the updated Comprehensive Plan. The Comprehensive Plan Map and Text Amendment package presented as Legislative Land Use File #21-03 represents the recommendation of the City Council to the City of Turner for public hearing. The proposed amendment includes a UGB expansion totaling 49 acres of residential land and 2.3 acres of public facility land which the City of Salem is in the process of purchasing as it abuts Franzen Reservoir. Land Use Development Code updates consistent with HNA recommendations and proposed Comprehensive Plan changes are included in this application.

APPLICABLE CRITERIA:

- HNA Findings in this Staff Report respond to Statewide Planning Goals with specific attention to Goal 10 (Housing).
- Code Amendment Findings in this Staff Report respond to Article 2, Section 2.700 (Amendments).
- UGB Amendment Findings (attached Exhibit N) respond to Statewide Planning Goals with specific attention to Goal 14 (Urbanization). The proposal requires a legislative public hearing process in conformance with LUDC **Section 3.520**.

APPLICATION SUMMARY:

Historical Background

The City's corporate limit and urban growth boundary are contiguous. In 2006, the City pursued the first review looking at an expansion but did not move forward. In 2008, the City worked in partnership with a private consultant to do the first high-level buildable lands analysis. That work indicated there remained too much vacant land in the City limits to be able to pursue any expansion. By 2016, new development had changed that inventory. An intern was acquired through the Council of Governments to pursue a more detailed buildable lands inventory. That analysis resulted in the conclusion that until the developments surrounding the current lake were substantially permitted, an expansion was still premature. In addition, that analysis provided a first run with DLCD and County representatives through the land selection alternatives analysis process.

Current background

By late 2019, the developments surrounding the former gravel mine now called Turner Lake were fully approved and in the process of being built out. In addition, another 50-lot subdivision had been approved and was under construction adjacent to the Salem reservoir. Turner was growing at one of the highest annual percentage rates in the state, and available residential land had essentially disappeared. These projects represented truly the last large parcel for residential development that was possible in Turner outside of the 100-year floodplain. City staff then brought a recommendation to the City Council to hire a consultant and begin the long process of analyzing the data in order to consider an urban growth boundary expansion, if it was warranted by the data.

As with many communities, Turner has had growth cycles and no growth cycles. Its association with the large metropolitan area of Salem, however, tends to smooth these extremes towards a generally higher rate of growth. Recent building trends gave a sense that Turner had been found as a rural, high quality-of-life community, but only seven minutes from the state capital. The City needed to provide complete and accurate analysis of both land inventories and housing availabilities to ensure that the 20-year population growth needs could be adequately provided for.

Buildable lands inventory and housing needs analysis

The first task was to create an accurate inventory of current lands. This is done by using a combination of tax assessor and field data, and categorizing land as vacant, not vacant or partially vacant based on state rules. Of note, the City had a number of parcels located partially within the hundred year floodplain and areas with steep slopes, which were considered unbuildable due to these constraints. The City Council meetings on June 25, 2020, and

September 24, 2020, discussed Turner’s Buildable Land Inventory (BLI).

The housing needs analysis (HNA) included a detailed assessment of the actual housing stock in the City was performed. This was then analyzed relative to both state land-use goals as well as the market and policy goals guiding the type of housing needed over the next 20 years.

When comparing the supply of buildable land with the estimate of land needed to accommodate growth of population and housing over the 2021-2041 period, the analysis revealed that based on current zoning conditions, the current land inside the City limits had a deficit of 73 acres. Phrased differently, based on population projections the current City limits and current zoning conditions could only service 33% of the anticipated population need over 20 years.

Through this work, the conclusion was that the City could provide a number of policy changes mainly in housing types, such as including town homes, cottage housing and accessory dwelling units in their allowed uses thus lowering minimum lot sizes to enhance densities. The policy choices that are detailed in Exhibit D Appendix 2 HNA, result in a 33% reduction in buildable land need, but with a total of 49 acres still needed to provide for the twenty year residential land supply.

Both the buildable lands inventory and housing needs analysis were brought to work sessions with the City Council on September 24, 2020, and January 21, 2021.

Urban growth boundary alternatives analysis

With this calculated land deficit (49 acres), attention then turned to the process of where an urban growth boundary (UGB) expansion could occur. As part of this process, the City of Salem determined that, if the UGB expansion was adjacent to the Franzen Reservoir, the City would need to establish a small buffer between newly urbanizing land and the Reservoir. Salem determined they needed a buffer of about 2.3 acres around Franzen Reservoir, to ensure continued high water quality in the Reservoir and protect it from negative impacts of new development.

State law is both explicit and complex when it comes to this analysis. It involves a variety of state defined land-use opportunities and constraints, such as exception lands, constrained lands, serviceability and soil types. In particular, Statewide Planning Goal 14 lays out a framework of analysis which must be followed in order to appropriately determine an urban growth boundary location. Of note in this work, because of the 100-year floodplain, a number of expansion alternatives around the Mill Creek channel and associated tributaries are eliminated from consideration. All of this analysis is provided in Exhibit N: Turner Comprehensive Plan and UGB Amendment Justification and Findings. This analysis was brought to the City Council in a workshop session on August 26, 2021 as Exhibit C, with Exhibit N the

edited document, based on DLCD comments.

Proposed UGB expansion area

Exhibit Q is a map showing the UGB expansion proposal based on the above analysis. Significant attributes of this site which are supported by the analysis include:

- less costly and more efficient utility development
- provides for harmonious urban form, and effective transportation network
- provides for inclusion and protection for the City of Salem public reservoir
- new development will be highly compatible with surrounding City uses

The comprehensive plan designations for land are shown on Exhibit R, the draft updated Zoning and Comp Plan Map. These have been laid out to harmonize with existing zoning patterns. The high-density lands have been placed closer to a major arterial to assist with transportation flow.

PUBLIC & AGENCY COMMENTS:

- 1) Notifications of the application were sent to property owners in the proposed UGB expansion area as well as property owners within 250 feet of the proposed expansion area. It was also included in the City's October newsletter which was mailed out with the October utility bills, ran in the Stayton Mail on October 6, 2021, on the City's website www.cityofturner.org and on the City's Facebook page.
- 2) Notifications were also sent to potentially affected agencies on October 8, 2021, including ODFW, ODOT and other local agencies.
- 3) Notification of the March 10 public hearing was put in the Statesman Journal on Thursday February 17, on the City's website, www.cityofturner.org, on the City's Facebook page and in the March City of Turner newsletter as well as being e-mailed to anyone who had requested information the UGB expansion process in Turner on February 16. Letters were mailed out to everyone within 250 feet of the proposed expansion on February 23 to notice the second public hearing.
- 4) Notifications were also sent to potentially affected agencies on February 24, 2022.

STAFF REVIEW:

City of Turner staff have reviewed the proposed Housing Needs Analysis (HNA), proposed Land Use Development Code (LUDC) Amendments, proposed Comprehensive Plan text amendments, and the proposed UGB amendment, as well as supporting documentation included in the application package.

Each element of the proposed amendment package has been professionally prepared and shown to be consistent with applicable state and local regulations.

Through the public hearings process, staff expects to receive additional testimony from local and statewide interests; all relevant testimony will be acknowledged and addressed. Staff has now prepared final Council findings consistent with the Council decision on the application package.

CRITERIA REVIEW AND FINDINGS:

The application package will be reviewed at both a local (City and County) and statewide level. Amendments to the Comprehensive Plan include:

- Text changes to multiple chapters consistent with the HNA (Exhibit E);
- Adoption of the HNA as Appendix 2 to the Comprehensive Plan (Exhibit D); and
- The proposed UGB amendment (Exhibit Q).

HNA Findings and Consistency with Statewide Planning Goals

Goal 1 Citizen Involvement

Goal 1 calls for the opportunity for citizens to be involved in all phases of the planning process. The public was provided the opportunity to be involved in the decision-making process regarding the Turner Housing Needs Analysis (HNA) through public meetings (in-person and by video conference) with the City Council, including: (1) a work session with the City Council to kickoff the HNA on June 25, 2020, (2) a work session reviewing the results of the HNA and land use efficiency measures on September 24, 2020, (3) a work session that focused on the land use efficiency measures and potential zoning code changes in January 21, 2021, (4) a work session that reviewed the results of the HNA, land use efficiency measures, and potential code changes on August 26, 2021, and (5) the hearings process with the City Council.

The City publicized these work sessions by posting a notice at the Turner Post Office, e-mailing agenda notices to all on the agenda notice list as well as those who had expressed an interest in the Urban Growth Boundary expansion process and posting information about the workshop on the City's Facebook page.

The public has had the opportunity to be involved in decision making for issues related to the Housing Needs Analysis, such as changes to the zoning code to adopt land use efficiency measures.

Goal 2 Land Use Planning

Goal 2 outlines the basic procedures of Oregon's statewide planning program, stating that land use decisions must be made in accordance with comprehensive plans and that effective implementation ordinances must be adopted.

In the process of developing the housing needs analysis, the City inventoried existing residential land uses, projected suitable land needs by land use classifications, and compared these needs

with potentially suitable land within the Turner urban growth area. The resolution of land need and supply is found in the HNA report, which will serve as the factual basis for the City to rely on for future planning efforts. The data in the analysis is from reputable sources such as the Census and Marion County. This HNA, when adopted into the comprehensive plan by reference, will provide an important source of information to use when considering amendments to the Turner Land Use Development Code and future amendments to the comprehensive plan.

The factual basis for the update of Turner’s Comprehensive Plan includes analyses and background research identifying issues and trends and providing a framework for future policy development. The findings for Goal 10 provide more detailed information about the background analyses and inventories and rely on specific data to establish findings that provide a technical basis for developing policy recommendations. The analysis and inventories include:

Buildable Lands Inventory, which analyzes existing development patterns and intensity, land and development values, existing land use designations and zoning, and building constraints to determine where there is vacant land or partially vacant land, and compares the existing supply of land to emerging trends and indicators for future estimates of demand; and

Housing Needs Analysis, which provides information about the factors that could affect housing development, including demographics, affordability trends, workforce housing availability, market health, and regulatory structure (see findings for Goal 10).

The Housing needs analysis is consistent with the current and revised Comprehensive Plan goals and policies. The report *Turner Comprehensive Plan and UGB Amendment: Justifications and Findings* includes findings to support updates to Turner’s Comprehensive Plan and to be consistent with the results of the HNA and the proposed UGB expansion. The Comprehensive Plan updates will be adopted at the same time as the HNA and the proposed UGB expansion.

All pertinent documentation has been made available to all interested parties. Goal 2 has been properly addressed. The HNA and Comprehensive Plan amendment to adopt the HNA as referenced are consistent with Statewide Planning Goal 2.

Goals 3 Agricultural Lands and 4 Forest Lands

As stated in 660-024-0020(1)(b), Goals 3 and 4 are not applicable to the HNA and updated Comprehensive Plan policies. No further analysis is required.

Goal 5 Open Spaces, Scenic and Historic Areas & Natural Resources

Goal 5 requires local governments to inventory and protect natural resources. There are no inventoried significant Goal 5 resources in any of the areas included within the UGB for this project. No further analysis is required.

Goal 6 Air, Water and Land Resources Quality

Goal 6 requires local comprehensive plans and implementing measures to be consistent with state and federal regulations. By complying with applicable air, water and land resource quality policies in the Turner Comprehensive Plan, Goal 6 will be properly addressed. No further analysis is required.

Goal 7 Areas Subject to Natural Disasters and Hazards

Goal 7 requires that jurisdictions apply appropriate safeguards when planning development in areas that are subject to natural hazards such as flood hazards.

The identified natural hazards in Turner are flooding and landslide hazards. Land within the floodway is considered unsuitable for urban development. The HNA considered lands within the FEMA flood hazards and areas with very high landslide hazards to be unbuildable and attempted to avoid expanding into areas with identified flood hazards. Thus, Goal 7 has been properly addressed.

Goal 8 Recreation Needs

Goal 8 requires governmental organizations with responsibility for providing recreational facilities to plan for recreational facilities. Turner adopted the *Turner Parks System Master Plan* in 2014.

The HNA does not modify or propose changes to the existing Turner Parks System Master Plan. Goal 8 does not directly apply to the housing needs analysis or comprehensive plan amendment because no new Goal 8 program is advanced by this amendment and no existing Goal 8 program is changed by this amendment.

Therefore, Goal 8 is not applicable to the HNA and associated comprehensive plan amendment because the amendment does not propose to change comprehensive land use plan policies or implementing regulations for compliance with Statewide Planning Goal 8. No further analysis is required.

Goal 9 Economy of the State

Goal 9 requires jurisdictions to plan for an adequate supply of land for employment uses to further goals for economic development. Turner is not evaluating employment land needs, so Goal 9 is not applicable. No further analysis is required.

Goal 10 Housing

The City conducted a housing needs analysis using the methods described in the recommended approach is described in “Planning for Residential Growth: A Workbook for Oregon’s Urban Areas,” the Department of Land Conservation and Development’s guidebook on local housing needs studies. Goal 10 requires the City to maintain and plan for an adequate land supply to

accommodate at least 20 years of future growth to ensure the availability and prices of housing units are commensurate with the needs and financial capabilities of Oregon households.

Comprehensive plans are required to include an analysis of community housing needs by type and affordability, an inventory of residential land, and an estimate of capacity of buildable land; contain policies for residential development based on that analysis that increase the likelihood that needed housing types will be developed; and provide for an adequate supply of a variety of housing types.

The proposed updates to the Turner Comprehensive Plan, including updates to Section 9.490 (Housing Goals & Policies) are consistent with the findings of the HNA. These proposed changes will be adopted concurrent with adoption of the HNA. The *Turner 2021–2041 Housing Needs Analysis* report is consistent with the goals and policies in the Comprehensive Plan. The overall housing goal is:

Housing Goal: To increase opportunities for all citizens of Turner to enjoy safe decent sanitary housing at affordable prices. (Section 9.490)

The findings for Goal 10 Housing, based on the City’s proposed *City of Turner 2021–2041 Housing Needs Analysis* report, include findings that demonstrate that Turner currently has a range of housing types, including single-family detached and attached homes, duplexes, multi-family, and mixed-use developments, and has a need for additional capacity to provide for needed housing during the next 20 years.

The *Turner 2021–2041 Housing Needs Analysis*, which shall be adopted by reference in the Comprehensive Plan Amendment and included as an exhibit to the adopting ordinance, provides information about the factors that could affect housing development, including demographics, affordability trends, workforce housing availability, market health, and regulatory structure. The *Turner 2021–2041 Housing Needs Analysis* includes the City’s buildable lands inventory for residential lands within the Turner UGB.

The City’s proposed HNA responds to the City’s updated 20-year population projection and provides data on the number of housing units the City will need to serve the future population. The proposed HNA also provides an inventory of buildable lands to ensure the comprehensive plan map is up to date and adequate. Key findings from the City’s proposed HNA include the following:

- Turner is forecast to grow from 2,459 people to 3,695 people, an increase of 1,235 residents between 2021 and 2041. The 1,235 new residents will result in 507 new households.
- Historically, about 84% of Turner’s housing was single-family detached. New housing in Turner is forecast to be 67% single-family detached, 8% single-family attached, and 25%

multifamily (12% will be duplexes, triplexes, and quadplexes, and 13% will be multifamily housing with five or more units).

- Turner has a deficit of land in the single-family plan designations, about 66 gross acres to accommodate 228 dwelling units.
- Turner has a deficit of land in the multifamily plan designations, about 8 gross acres to accommodate 80 dwelling units.
- Turner does not have sufficient land to meet identified needs in the Single-Family Residential (R-1), Single-Family Residential (R-2), or Multi-Family Residential (R-11) plan designations. zones
- Based on a comparison of Turner’s demand for housing (497 new dwelling units between 2021 and 2041) and capacity for housing on buildable residential lands in the City (189 dwelling units on buildable land), the HNA finds that Turner has a deficit of housing capacity in each of its residential plan designations.
- Turner needs to identify opportunities to meet its unmet residential land need, both for the deficit of 73 acres and for affordable housing. The report *Turner Comprehensive Plan and UGB Amendment: Justifications and Findings* describes how Turner intends to meet these unmet land needs through a combination of land use efficiency measures and expansion of its UGB.
- Turner has unmet needs for affordable housing, both for renters and homeowners. About 23% of all households in Turner are cost burdened, meaning they spend more than 30% of their incomes on housing costs. About 45% of households that rent and 16% of households that own their home are cost burdened.

Assuming that Turner adopts the land use efficiency measures and UGB expansion proposed in the report *Turner Comprehensive Plan and UGB Amendment: Justifications and Findings*, Turner will have met requirements of Goal 10.

Goal 11 Public Facilities and Services

The Turner *2015 Water System Master Plan Update* is Turner’s adopted water master plan. The forecast used in the *Master Plan* assumes that Turner will have 3,042 people by 2035. Based on the Portland State University forecast of population used in the Housing Needs Analysis, Turner will reach about 3,000 people between 2025 and 2030. This is about 695 fewer people than Turner will have in 2041. However, Turner’s source of water is the City of Salem and the contract with the City of Salem has no limit on the amount of water available to Turner.

Turner expects to update its Water System Master Plan within seven to 10 years of expanding its UGB. These updates will address the need to accommodate about 650 people more people than the currently adopted plans were developed for.

Turner does not have a wastewater system plan. Sewer service is currently available at the existing City Limits north of the intersection of Delaney and Mickey Ln. According to the city engineer (AKS Engineering & Forestry), wastewater from the proposed UGB expansion area can be collected via gravity mains and is serviceable via the Aldersgate Sewer Pump Station. Existing sanitary infrastructure can serve all areas of the proposed UGB expansion without additional pump stations, although some localized improvements and upsizing of the existing Aldersgate Sewer Pump Station outlet piping may be necessary.

The HNA or comprehensive plan amendment proposes no new Goal 11 program and no existing Goal 11 program is changed by this amendment. The HNA and amendment do not propose to change the comprehensive land use plan policies or implementing regulations regarding public facilities and services for compliance with Statewide Planning Goal 11.

For the above reasons, the City finds that Goal 11 has been addressed. No further analysis is required.

Goal 12 Transportation

Goal 12 encourages the provision of a safe, convenient and economic transportation system. This goal also implements provisions of other statewide planning goals related to transportation planning in order to plan and develop transportation facilities and services in coordination with urban and rural development (OAR 660-012-0000(1)).

The HNA and comprehensive plan amendment proposes no new Goal 12 program and no existing Goal 12 program, or standard, is changed by this amendment. The HNA and amendment do not propose to change the comprehensive land use plan policies or implementing regulations regarding transportation and compliance with Statewide Planning Goal 12. No further analysis is required.

Goal 13 Energy

Goal 13 requires land and uses developed on the land to be managed and controlled so as to maximize the conservation of all forms of energy, based upon sound economic principles. Energy consequences of the proposed urban growth area amendment have been considered in the Goal 14 alternatives analysis process. Therefore, Goal 13 has been adequately addressed.

Goal 14 Urbanization

The HNA showed unmet need for 73 acres of residential land. Through land use efficiency measures described in the report *Turner Comprehensive Plan and UGB Amendment: Justifications and Findings*, that unmet land need was reduced to 49 acres. The report *Turner Comprehensive Plan and UGB Amendment: Justifications and Findings* provides findings for these land use efficiency measures and a proposed expansion to the Turner UGB to accommodate unmet land need.

The requirements of Goal 14 are met in the report *Turner Comprehensive Plan and UGB Amendment: Justifications and Findings*, which is proposed for adoption in the same action as the HNA.

Goal 14 has been compliance is demonstrated in x *Turner Comprehensive Plan and UGB Amendment: Justifications and Findings* report.

Goal 15 through 19

Goals 15 through 19 are related to the Willamette Greenway and coastal resources. As such, these goals do not apply to the subject sites and no further analysis is required.

Turner Land Use Development Code Amendment Findings

Exhibit F details LUDC changes. Findings for compliance with LUDC Article 2, Section 2.700 are included below.

(2) *Decision Criteria. All requests for an amendment to the text or zoning map of this Code may be permitted upon authorization by the City Council in accordance with following findings:*

(a) *The proposed amendment is consistent with the intent of the Comprehensive Plan.*

Staff Finding: The proposed code amendments implement efficiency measures identified by Exhibit D: 2021-2041 Turner Housing Needs Analysis (HNA). The HNA is directly referenced in proposed Comprehensive Plan amendments relating to Section 9.400 Housing and Section 9.500 Land Use and is proposed to be adopted as Appendix 2 of the Comprehensive Plan. Therefore, the proposed changes are consistent with the explicit intent of the Comprehensive Plan.

(b) *There is a public need for the proposed amendment to comply with changing conditions or new laws.*

Staff Finding: The LUDC implements the Comprehensive Plan and is required to be consistent with the Comprehensive Plan. As explained above, the HNA and proposed changes to the Comprehensive Plan related to Section 9.400 Housing and Section 9.500 Land Use require LUDC amendments. Therefore, there is a public need and legal requirement for the proposed LUDC amendments.

(c) *The amendment will not adversely impact adjacent areas or the land use plan of the city.*

Staff Finding: The proposed LUDC amendments do not change the land use plan of the city (i.e.,

zoning or comprehensive plan boundaries). Proposed LUDC amendments allow for additional residential development types and increased densities within the residential zones consistent with proposed Comprehensive Plan amendments. The proposed LUDC amendments are purely residential and do not allow potential conflicting uses such as Commercial or Industrial in residential zones. The LUDC also contains development standards to ensure compatibility with adjacent areas. Therefore, the proposed amendment will not adversely impact adjacent areas or the land use plan.

(d) The amendment will not have an adverse environmental impact.

Staff Finding: Proposed LUDC changes do not modify or impact environmental protections or zone boundaries. Additional residential development types will allow more flexibility to adjust to existing environmental constraints on residential land. Therefore, the proposed development code changes represent no adverse environmental impacts.

(e) The amendment will not have an adverse impact on public facilities.

Staff Finding: Proposed changes to the LUDC contain efficiency measures that may increase housing capacity within the Turner UGB. Exhibit C provides public facility capacity analysis in Section 6, under Goal 11 and Goal 14 discussions. The proposed LUDC changes are incorporated into and consistent with planned public facility capacity and will therefore not have an adverse impact on public facilities.

(f) The amendment will not have an adverse impact on transportation.

Staff Finding: The proposed LUDC changes include allowing potential increased density; per Exhibit C, these changes are expected to increase capacity by approximately 53 dwelling units over the next 20 years (less than 3 units/year on average) over the entire UGB. All arterial and collector streets have surplus capacity to deal with very minor additional traffic related to this diffused change. Motor vehicle incident records do not indicate any street locations potentially impacted by these changes where street safety could be negatively impacted. The LUDC transportation standards continue to apply and regulate transportation impacts. Therefore, proposed LUDC changes are not expected to create any impact on the transportation system.

(g) The amendment will not have an adverse impact on economy of the area.

Staff Finding: The proposed development code amendments allow for greater flexibility and density potential, allowing for greater value in residential land development. Providing capacity for additional population is also supportive of local commercial and industrial development by providing housing for employees and consumers of goods. Therefore, the proposed amendment is expected to have a positive impact on the economy of the area.

(h) *The amendment is consistent with the intent of Statewide Planning Goals.*

Staff Finding: The proposed plan amendments are consistent with and required by Statewide Planning Goal 2 (Land Use Planning) to implement proposed Comprehensive Plan amendments that directly address Statewide Planning Goals 10 (Housing) and 14 (Urbanization). Exhibit C provides additional findings showing the overall plan amendment package is consistent with every applicable Statewide Planning Goal.

The proposed Turner LUDC changes (Exhibit F) implement the proposed Comprehensive Plan changes related to Section 9.400 Housing and 9.500 Land Use, which implement the HNA.

Comprehensive Plan changes must be found to comply with Statewide Planning Goals, as implemented by State Statutes and Administrative Rules, and applicable Comprehensive Plan Policies. UGB changes must be jointly approved by Turner and Marion County, and then acknowledged by DLCD.

LUDC changes must meet the requirements of LUDC Article 2, Section 2.700 – Amendments. Section 2.700 addresses potential impacts and requires consistency with both the Comprehensive Plan and Statewide Planning Goals.

Comprehensive Plan and UGB Amendment Findings

Exhibit N: Turner Comprehensive Plan and UGB Amendment Justification and Findings provides findings indicating compliance with the Statewide Planning Goals, Statute, and Administrative Rules, and applicable Turner Comprehensive Plan policies.

RECOMMENDATION:

Recommended Motion to Approve

Move to adopt through Ordinance 22-100:

- **The 2021-2041 Turner Housing Needs Analysis as Appendix 2 to the Turner Comprehensive Plan;**
- **Proposed Turner Comprehensive Plan text amendments consistent with Exhibit E;**
- **Proposed Turner Comprehensive Plan Map and Zoning Map amendments consistent with Exhibit R; and**
- **Proposed Turner Land Use Development Code amendments consistent with Exhibit I.**

EXHIBITS ADDED FOR MARCH 10, 2022 PUBLIC HEARING:

- Exhibit I Edited LUDC Text Amendments and Memorandum 2.2.22
- Exhibit J Edited Public Comments Received with Staff Response 3.1.22
- Exhibit K Edited Agency Comments Received with Staff Response 3.1.22
- Exhibit L Letters from AKS Engineering Regarding Serviceability
- Exhibit M Turner Local Wetlands Inventory Map
- Exhibit N Updated Turner Comp Plan & UGB Amendment Justifications and Findings
- Exhibit O Amended Staff Report HNA Adoption
- Exhibit P 7079 Combest Lane SE Easement Document
- Exhibit Q Proposed Expansion Area 3.1.22
- Exhibit R Proposed Comp Plan and Zone Map 3.1.22
- Exhibit S Proposed Adoption Ordinance 22-100

EXHIBITS FROM OCTOBER 28, 2021 PUBLIC HEARING:

- Exhibit A: Draft Proposed Expansion Area
- Exhibit B: Draft Comp Plan and Zone Map
- Exhibit C: Turner Comprehensive Plan and UGB Amendment Justification and Findings
- Exhibit D: 2021-2041 Turner Housing Needs Analysis
- Exhibit E: Comprehensive Plan Text Amendments and Memorandum
- Exhibit F: LUDC Text Amendments and Memorandum
- Exhibit G: Public Testimony and Agency Comments Received
- Exhibit 19: Mill Creek Basin Study
- Exhibit H: UGB Public Comments Compiled with Staff Responses 11.10.21