

Keizer Revitalization Plan

Draft Memorandum #4: Gap Analysis

Submitted to: City of Keizer August 3, 2018

Prepared By: Otak, Inc., Angelo Planning Group, Johnson Economics, and Kittelson & Associates
Project No. 17428.A









TABLE OF CONTENTS

	Page
Introduction and Overview	3
1. Baseline Future	4
1.1 Scenario Planning	4
1.2 The Scenarios	10
Scenario 1 – The Baseline	10
Scenario 2 – Efficiency Measures	
Scenario 3 – Upzoning	
1.3 Comparison of Scenarios	21
2. Consistency with Project Goals and Objectives	26
3. Impediments to Implementation	29
3.1 Market Conditions	
3.2 Public Facilities and Services	30
3.3 Transportation Plans	30
3.4 Comprehensive Plan	30
3.5 Development Code	31
Existing Zoning	33
Permitted Uses	35
Development and Design Standards	
Frontage Improvement Requirements	
Code Structure and Administration	45
4. Potential Implementation Measures	
4.1 Performance-Based Development Code	
4.2 Form-Based Development Code	
4.3 Existing Development Code	49
5. Investments in Public Facilities and Services	55
6. Implementation Steps	57
6.1 Potential Code Amendments	57
6.2 Potential Investments	57
Tables	
Table 1 – Building Prototypes	4
Table 2 – Development Types	
Table 3 – TSP 2031Baseline Operations	
Table 4 – Development Type Densities	16
Table 5 - Land Use Objectives, Strategies, and Potential Impediments	
Table 6 - Zoning Designations in Study Area by Number of Parcels	
Table 7 - Permitted Uses, By Zone	
Table 8 - Existing Site Standards, by Zone	
Table 9 - Existing Building Standards, By Zone	44

Figure 1 – Traffic Analysis Zones	6
Figure 2 – Vacant and Potentially Underutilized Land	7
Figure 3 – Scenario Painting	8
Figure 4 – Property Value Per Square Foot	
Figure 5 – Scenario Maps	10
Figure 6 – Baseline Scenario	
Figure 7 – Scenario 2	17
Figure 8 – Scenario 3	20
Figure 9 – Keizer Zoning Map	35

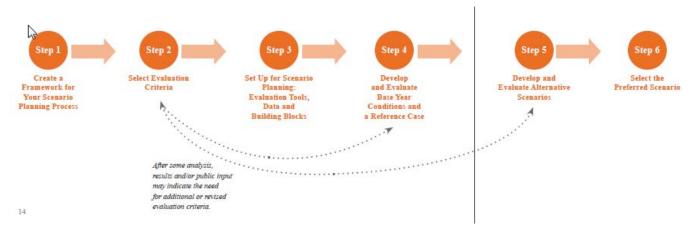
Introduction and Overview

The Keizer Revitalization Plan is being built upon a framework for Keizer community history and values, coupled with technical analysis and stakeholder engagement. The gap analysis comprises the technical analysis portion of the project. Scenario planning provides the tools with which we are identifying gaps between potential future outcomes as compared to the Goals and Objectives identified in Phase 3, and identifying potential changes to policies, regulations or investments that can bring the future closer to alignment with the stakeholder goals.

Scenario planning¹ allows evaluation of the likely outcomes of existing zoning and infrastructure capacities in order to explore possible benefits and costs of alternative futures. With scenario planning, Keizer can better understand the way regulations or market conditions affect development and how that development fares when examined through the lens of the goals and objectives. Examining multiple scenarios, working toward a preferred can help stakeholders choose how to move forward by modifying existing plans or identifying strategies for investments and initiatives.

Scenario planning is not about predicting the future or providing a specific answer. Rather, it is a methodology for imagining futures not easily estimated using past trends or assumptions. The expectation is that through the process of conceiving, developing, and evaluating a series of future scenarios and the outcomes they produce, a preferred and feasible course of action can be identified.

This memo describes the scenarios that were developed, how these model futures will look in terms of what is important to Keizer, and what types of actions the City can consider toward the realization of desirable outcomes.



This graphic from Oregon's Scenario Planning Guidelines provides a quick look at the scenario planning process

¹ Oregon Scenario Planning Guidelines https://www.oregon.gov/ODOT/Planning/Documents/Oregon-Scenario-Planning-Guidelines.pdf

1. Baseline Future

1.1 Scenario Planning

In the quest for developing a revitalization plan and identifying workable strategies we begin with developing an understanding of how current public policy and market forces will shape Keizer's future. We employed Envision Tomorrow a GIS-based scenario modeling software package to develop a Baseline future along with additional scenarios to learn how regulatory changes or investments might create new choices. Envision Tomorrow consists of two primary tools:

Prototype Builder was used to model example building prototypes, testing the physical and financial feasibility of development. The tool allowed us to examine land use regulations in relation to the current development market and consider the impact of parking, height requirements, construction costs, and monthly rents.

21 building prototypes were developed. They are <u>only</u> examples of contemporary Oregon developments and were created with consideration of Keizer's zoning code and the market analysis of phase 2. There are untold number of buildings that could theoretically be constructed. This list spans the range, containing building types that will appear familiar to many. The following summary table describes the prototypes.

Table 1 - Building Prototypes

Building Name	Building Lot Coverage	Landscapin g Lot Coverage	Parking Lot Coverage	Height (Stories)	Floor Area Ratio (FAR)
Apartment – 2 stories	38%	32%	30%	2	0.57
Apartment – 2 stories with tuck-under parking	38%	37%	25%	3	0.46
Apartment – 3 stories	31%	25%	44%	3	0.75
Apartment – 3 stories w/ code changes	47%	15%	39%	3	1.13
Apartment – 5 stories	26%	35%	39%	5	1.05
Apartment – 5 stories w/ code changes	71%	14%	15%	5	2.83
Mixed-Use Residential – 3 stories	34%	28%	38%	3	0.93
Mixed-Use Residential - 3 stories with code changes	71%	5%	24%	3	1.91
Mixed-Use Residential – 5 stories	43%	25%	32%	5	1.94
Mixed-Use Residential – 5 stories with code changes	71%	5%	24%	5	3.21
Townhomes	48%	42%	0%	2	0.91
Cottage Homes	36%	49%	15%	1	0.32

"Skinny Lot" Single Family - 2,500 sq ft	61%	35%	4%	2	1.01
Small Lot Single Family - 4,000 sq ft	53%	30%	17%	1	0.37
Conventional Lot Single Family - 6,000 sq ft	44%	44%	12%	1	0.40
Office – 2 stories	46%	25%	9%	2	0.83
Office – 3 stories	38%	25%	17%	3	1.08
Suburban Office – 1 story	40%	26%	34%	1	0.34
Light Industrial / Warehousing – 1 story	27%	30%	43%	1	0.22
Arterial Commercial – 1 story	33%	25%	42%	1	0.26
Hotel – 2 stories	25%	25%	50%	2	0.45

Scenario Builder includes a series of Development Types. These represent the different zoning categories found within greater River Road/Cherry Avenue corridors. The library of Building Prototypes was combined within the Development Types. The RS zone for example allows for single-family homes within a narrow range of lot sizes. The RS Development Type assumes that 75% of the lots that are built upon would be roughly 6,000 square feet while the remaining 25% would be smaller lots closer to 4,000 sf. The building mix becomes more complex for mixed use zones where property owners might develop anything from a one-story retail shop to a threestory mixed-use building. With buildings assigned to the Development Types we can see a number of factors, such as housing and job density and even level of complimentary uses that might help minimize the need to drive. Table 2 describes the Development Types used. Note, some zoning districts are represented twice. For example,

Table 2 - Development Types

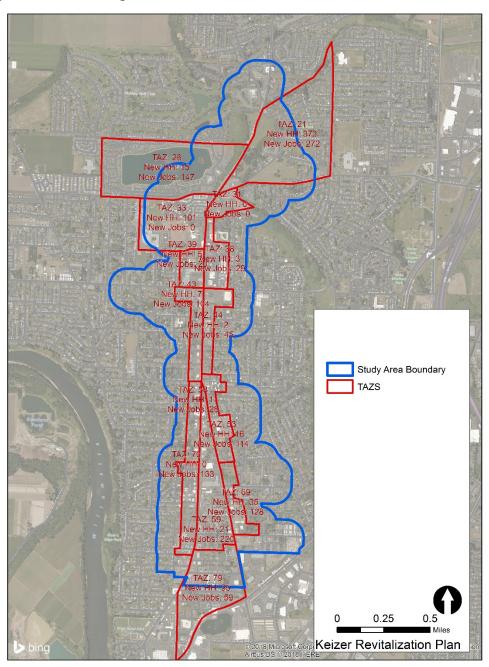
Development Type Name	Housing Units / Gross Acre	Jobs / Gross Acre	Mixed Use Score
CG 1	-	20.4	0%
CG 2	2.0	29.7	0%
CM 1	3.0	18.9	52%
CM 2	14.1	30.4	63%
CO	-	34.5	0%
CR	-	17.0	0%
IBP	-	15.5	0%
MU 1	6.2	12.3	63%
MU 2	21.7	21.2	58%
P	-	-	0%
RL	5.6	-	0%
RL LU	6.5	-	0%
RM 1	13.0	-	0%
RM 2	26.5	4.0	24%
RS	6.5	-	0%
RS 2	12.7	-	0%

the RS type represents development that is common today based on the zoning code. RS 2 includes more housing options and limits some site restrictions that may allow for more development. The baseline scenario uses the former while the second versions of the Development Types are used in some alternate scenarios.

The process starts by creating a Baseline Future Scenario that estimates what the future would likely look like if current plans are carried out and evaluating it based on the project's goals. It then includes alternative scenarios for the future to be evaluated and then presented with it in in this memo.

The Baseline is a model of how Keizer can be expected to occur based on existing policies and current trends. Keizer's Transportation System Plan predicted that roughly 700 new housing units and 1,300 jobs would locate within the project area between 2009 and 2035. This represents an increase in households of a little more than 25%. The job increase is somewhat higher at roughly 35%. Figure 1 below shows the Traffic WS1] Analysis Zones (TAZs) that correspond with the study area and the amount of growth expected for each.

Figure 1 – Traffic Analysis Zones



The baseline scenario works on the assumption that vacant and underutilized properties see development between now and 2035 that matches the TSP's prediction. The study area has a limited

number of truly vacant parcels. Vacant land is identified by the Marion County Tax Assessor. Potentially underutilized land was identified by searching for large parcels with minimal improvements. These are depicted on the map in Figure 2. There are a few large properties in the north of Chemawa where the TSP predicted the greatest amount of growth.

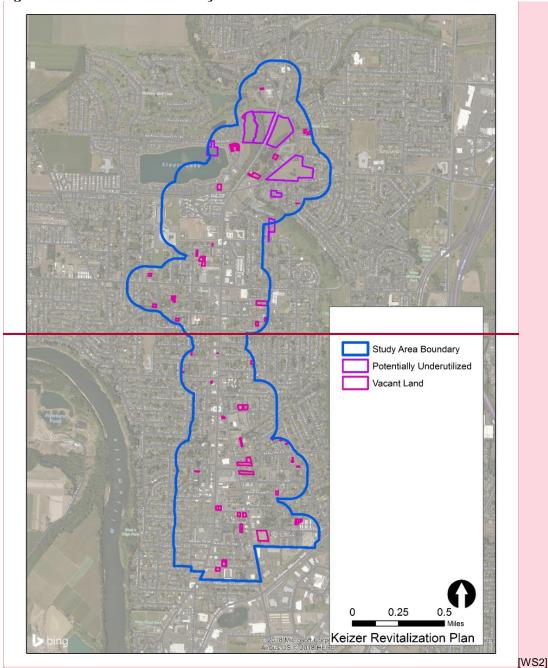
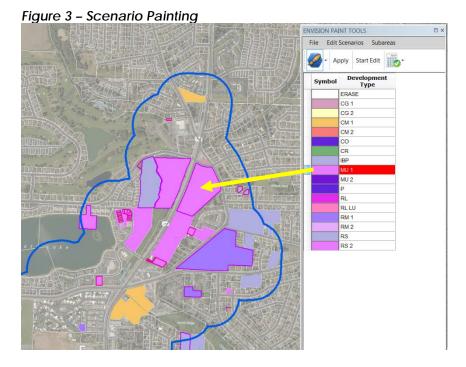


Figure 2 - Vacant and Potentially Underutilized Land

These vacant and underutilized parcels are assumed to develop in accordance with the zoning in place today.

The yellow arrow in Figure 3 illustrates that the parcel is predicted to develop with uses assigned to the MU zone Development Type. In this case, that results in an average of 6 housing units and 12 jobs per acre. Some properties will lean more toward commercial use, others toward residential; the Development Type therefore represents the average, not an exact prediction of what to expect by 2035.

It is also worth noting that environmentally sensitive lands and floodplains are



[WS3]

not expected to become developed. While they may not appear on the scenario map, the acreage has been removed from the parcel to avoid over counting.

There are just 18 acres of vacant land within the project area utilized by the baseline scenario. Vacant land alone cannot be relied upon to accommodate the forecasted growth. An additional 64 acres of already developed land would need to redevelop in some fashion to match the TSPs predictions. Redevelopment is most likely on properties that are less intensely used, with smaller and perhaps outdated buildings. When the total value or asking price of these properties is low enough new buildings can replace the old, increasing the property owner's revenues. Redevelopment is most likely where the zoning allows for higher intensity uses such as in the MU and CM zones.

How Redevelopment Works

Simply put, redevelopment can occur when the projected income from a development exceeds the combined costs of: buying the land, readying the site and getting approvals, and the cost of construction. Construction costs, and the local market rent, or sales prices are largely out of a developer's control. Accordingly, she or he will look at the asking price or value of a property when deciding which properties may be viable redevelopment opportunities.

Let us say for example that you want to build a brand-new two-story apartment building and you cannot find any vacant land for sale. If you can find a property owner who will sell you one-half acre of land at \$17.00 per square foot—roughly \$340,000, you could see a modest profit of just under 10% - generally better than most investment programs.mutual funds. There are not very many properties in Keizer's commercial core that would sell for this low of a sum. Accordingly, that new apartment building might not get built. In some cities a central address is highly desirable. If living near attractions on River Road were to become more desirable, residents may be willing to pay more each month to be closer to restaurants, shops and transit. This could allow for the developer to spend more on land, increasing the likelihood of new development. On the other hand, perhaps you are more interested in building a commercial building with a few tenants such as Knecht's, Great Clips and Panera Bread. In that case you could afford to pay over \$550,000 for the same size property. While there may be unwanted consequences of adding more single-use commercial to the corridor, such as increased traffic and more driveways interrupting the sidewalk, the current market favors them.

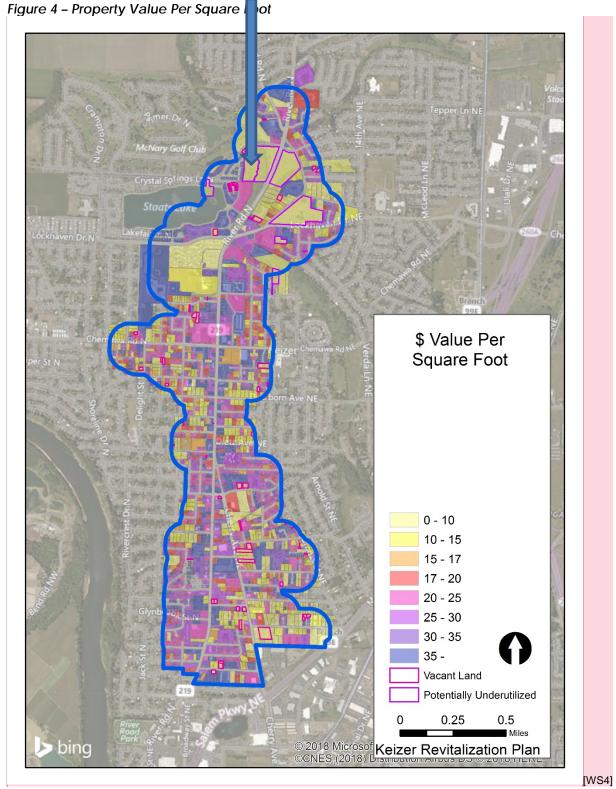


Figure 4 shows the combined value of buildings and land on a per square foot basis. Yellow colored properties may be more easily redeveloped whereas dark blue properties are of very high value and development is unlikely.

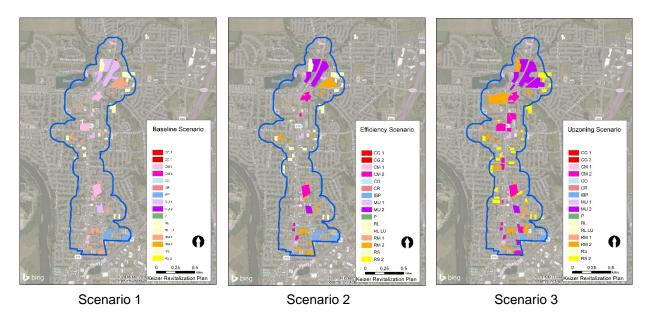
1.2 The Scenarios

Three scenarios were developed:

- **Scenario 1** The Baseline, represents build out of vacant land and potential redevelopment based on current regulations, market forces and is tied to the TSP's growth prediction.
- **Scenario 2** implements some "Efficiency Measures". It assumes roughly the same amount of land developed as the Baseline, but zoning rules are relaxed or modified in some areas to allow either more intense development or a greater range of housing options.
- Scenario 3 considers some "upzoning" in strategic locations to increase the amount of development that could occur.

These scenarios are illustrated in Figure 5 and described below.

Figure 5 - Scenario Maps



Scenario 1 - The Baseline

Keizer's zoning code allows a wide range of uses and levels of intensities. However, the higher building costs associated with taller buildings tends to either lead developers toward low-rise wood construction. Likewise, existing property owners are often inclined to retain the buildings currently on site even if they are not using the maximum potential of their site. The market analysis from Phase 2 of this project predicted that future development following current trends is likely to continue with single-family houses and townhomes in neighborhoods along with one, two and possibly three-story apartments. Similarly, single-story commercial buildings are also the most like to see developed. These types of uses are relatively low intensity, occupying perhaps one third of a property with buildings and devoting the rest to parking. Some two-story offices are also likely; however, they too will include large amounts of vehicle parking.

TSP Future Baseline (2031) Traffic Conditions & Operations

Within the Plan study area, the following arterial/arterial intersections have been identified and therefore; were evaluated using v/c ratio:

- River Road/Lockhaven Drive
- River Road/Chemawa Road
- River Road/Manbrin Drive

The remaining intersection within the Plan study area were evaluated using LOS:

- River Road/Wheatland Road
- River Road/Dearborn Avenue

Table 3 - TSP 2031Baseline Operations

	TSP Existing 2007		TSP Future E	Baseline 2031
Intersection	LOS	Capacity	Los	Capacity
River Road/Wheatland Road	С	Under Capacity	С	At Capacity
River Road/Lockhaven Drive	D	Under Capacity	D	Near Capacity
River Road/Chemawa Road	D	Under Capacity	D	Near Capacity
River Road/Dearborn Avenue	В	Under Capacity	С	At Capacity
River Road/Manbrin Drive	В	Under Capacity	С	Under Capacity

^{1.} Under capacity = v/c Ratio <0.90, Near Capacity = v/c Ratio 0.90-0.94, At Capacity = v/c Ratio 0.95-0.99, Over Capacity = v/c Ratio≥1.0

All study intersections are projected to meet the City's operational standards under the baseline conditions; however, the TSP also identified potential improvements (not financially constrained) including the <u>reconfiguration of and</u>-addition of turn lanes at the River Road/Wheatland Road and River Road/Manbrin Drive intersections. Improvements were also identified at River Road/Lockhaven Drive which have already been completed.

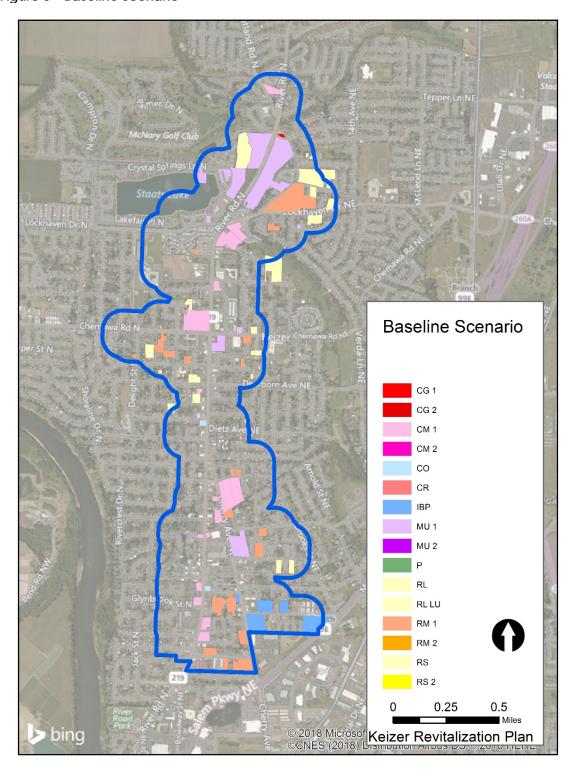
Impacts to Infrastructure

The Baseline is developed in accordance with Keizer's adopted Transportation System Plan. Accordingly, roadway impacts have been predicted with plans identified that will ensure that the network operates effectively.

The Comprehensive Plan confirmed, in relation to sewer, water, stormwater, parks and police that, "Urban expansion accomplished through in-filling within and adjacent to existing development in an orderly, unscattered fashion permits new development to utilize existing utilities, services and facilities or those which can be easily extended." It also stated, "The cost of providing key services and facilities to future development in Keizer is significant." Together, these statements declare that capacity for development according to existing zoning is in place, and that significant upzoning or UGB expansion could introduce costs that have either not been anticipated, or which would require new funding mechanisms such as increased development fees.

The Baseline Scenario assumes that all the vacant and highly underutilized lands identified earlier would be developed. In addition to the 18 vacant acres another 64 acres of developed land is assumed to redevelop—replacing existing buildings with new ones. With more than 80% of the new development taking place through redevelopment the majority of housing units would be multifamily.

Figure 6 - Baseline Scenario



2.

Scenario 2 - Efficiency Measures

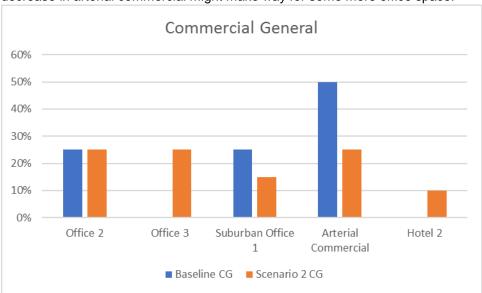
As cities update their comprehensive plans, or when considering expansion of an Urban Growth Boundary, they first examine existing regulations to see if there is more room for growth that could be realized. Planners often refer to modifications of existing regulations to allow for more growth in the same space as efficiency measures. Common techniques include the addition of options such as duplex development in single-family zones, reduced setbacks or parking requirements that allow for properties to be more highly utilized.

This scenario utilizes that same land as the Baseline Scenario. It differs in how the types and amounts of developments that are allowed within the existing zoning categories. Efficiency measures were applied to five zoning categories within the study area:

Commercial General (CG)

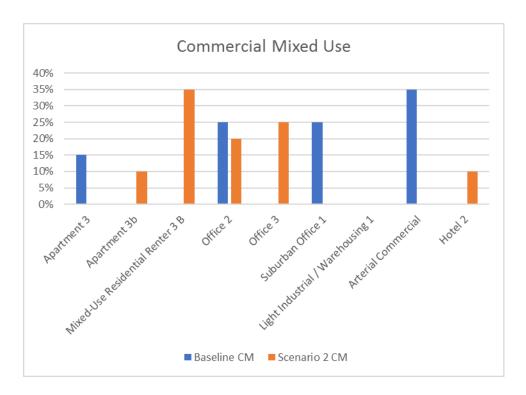
This zone typifies arterial development in many cities. It provides a location for larger scale shopping and commercial activity separated from residential areas to limit conflicts between those uses. It is also located for convenient auto access.

The following table shows how the <u>CGMU</u>zone differs from Scenario 1 to 2. As shown below, a decrease in arterial commercial might make way for some more office space.



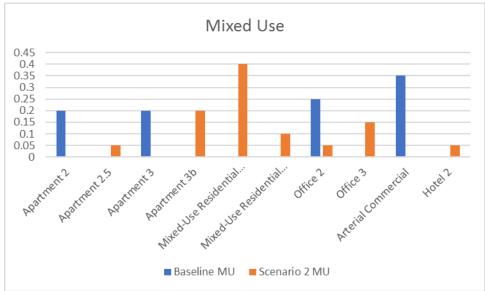
Commercial Mixed Use (CM)

The primary commercial zone within Keizer, this zone intends to combine commercial and residential uses in a safe walking environment with good access to transit. The Baseline Scenario assumed a mix of low-rise commercial and apartments. For Scenario 2, many of these single-use building types, namely arterial commercial and suburban office were replaced by mixed-use building and others at a slightly larger scale. The following chart shows how the CM zone differs from Scenario 1 to 2 You will notice that some buildings have a B added to their name. This represents modifications such as reducing setbacks and parking requirements to increase efficiency.



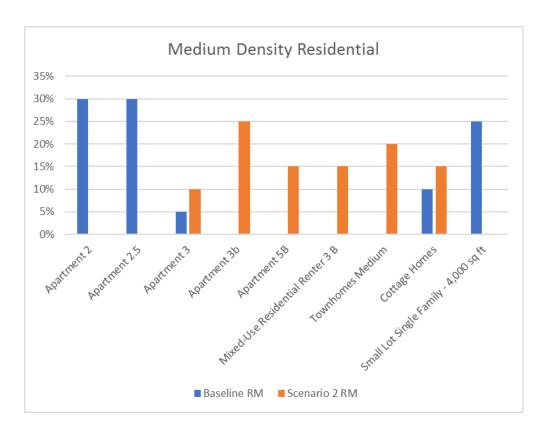
Mixed Use (MU)

The MU zone intends to provide a variety of uses, namely residential and commercial in close proximity, either within a building or nearby. The Baseline Scenario assumed a mix of low-rise commercial and apartments. For Scenario 2 many of these single-use building types were replaced by mixed-use building at a slightly larger scale. The following chart shows how the MU zone differs from Scenario 1 to 2.



Medium Density Residential (RM)

This is the primary multifamily zone within Keizer. It allows for a wide range of residential however, from detached single-family to duplexes and multi-story apartment or condominium buildings. The Baseline Scenario saw mostly two-story apartment and some smaller lot single-family homes. Scenario 2 saw a shift to larger multifamily buildings, cottage homes and townhomes. The chart below describes this shift in product type and intensity.



Single Family Residential (RS)

This zone focuses on detached single-family homes and some other uses such as in-home day care, some duplexes and home offices. The minimum lot size is 45,000 square feet for detached single family homes however most lots in Keizer are lager. The Baseline Scenario assumed a future mix of 75% 6,000 and 25% 4,000 sf. For Scenario 2 the mix was changed. Conventional lots got smaller with 40% of new housing coming through narrow lot single-family cottage homes and townhomes.

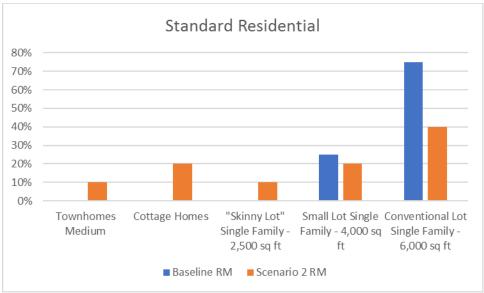


Table 4 below describes the relative densities of each development type. Notice how the "B" series types have increased densities, and often mix. The Mixed Use Score is also an indicator of likely reduction in vehicle trips relative to the overall amount of development when compared to similar levels of non-mixed growth.

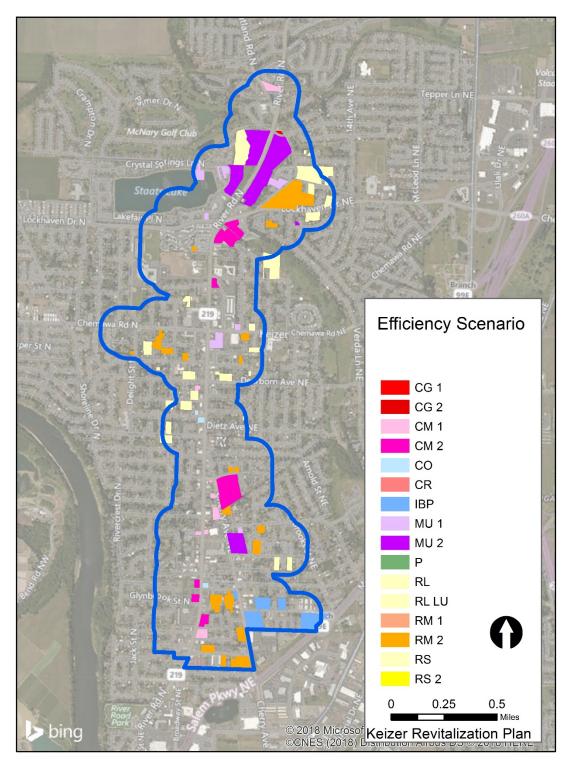
Table 4 - Development Type Densities

Table 4 - Develo	Housing		
Development	Units /	Jobs / Gross	Mixed Use
Type Name	Gross Acre	Acre	Score
CG	0.0	20.4	0.00
CG B	2.0	29.7	0.00
СМ	3.0	18.9	0.52
СМ В	14.1	30.4	0.63
СО	0.0	34.5	0.00
CR	0.0	17.0	0.00
IBP	0.0	15.5	0.00
MU	6.2	12.3	0.63
MU B	21.7	21.2	0.58
Р	0.0	0.0	0.00
RL	5.6	0.0	0.00
RL LU	6.5	0.0	0.00
RM	13.0	0.0	0.00
RM B	26.5	4.0	0.24
RS	6.5	0.0	0.00
RS B	12.7	0.0	0.00

The map of Scenario 2 (Figure 7) looks similar to the Baseline. The difference can be seen in the bolder colors depicting the use of the five Development Types that were modified with efficiency measures in place of their kin as used in the Baseline.

Scenario 2 also assumes that all the vacant and highly underutilized lands identified early would be developed. Two notable shifts appear. First, 815 additional housing units appear. Second, the increase in multifamily and mixed-use buildings is responsible for the majority of the new units, resulting in the share of multifamily housing rising to 80% of the new development.

Figure 7 - Scenario 2



The number of new jobs also rises with Scenario 2. However, the increase in mixed-use buildings replaced what may have been some office uses in the Baseline. As a result, new retail jobs rise from 20% to 27% while the percentage of office jobs falls from 77% to 70%. Both categories saw an overall increase, with jobs rising from nearly 1,100 to just over 1,300. Keizer currently has 35% of its workforce in retail jobs. This is higher than most cities of its size. Both scenarios reduce this slightly, to 32% and 33% respectively [WS6].

Impacts to Infrastructure

Scenario 2 was developed in accordance with Keizer's existing zoning as its guide. As identified in the Phase 2 Market Analysis, existing zoning theoretically provides for more growth capacity than can be realized based on market conditions. For example, the low-rise buildings that the financial market is constructing in the Mid-Willamette valley and specifically within Keizer tend to use less than half of the allowable density on a given site. Modelling done during the TSP accounted for some of the difference between growth capacity and the forecast. In short, the forecasted growth does not utilize the full capacity provided by current plans. Roadway impacts described in the TSP were based on the forecasted growth. Accordingly, some intersections could need upgrades sooner than planned, or see increased levels of congestion. The increased growth described by the scenario, while significant compared to the Baseline, is only an increase of 7% in terms of population. Such an increase could possibly be absorbed at a rate similar to that described by the TSP. The resulting change in trips on River Road from the additional growth in housing will be modeled in future phases of the project however the impact will be dependent upon development of retail and jobs in the corridor and the comfort level of walking and bicycling facilities in the area.

Keizer's water system enjoys ample capacity as does the sewer system owned by the City of Salem. No needed infrastructure increases for sewer, water or stormwater have been identified other than on-site needs such as utility hook-ups, stormwater treatment and repairs to aging systems. Public safety provision, like schools is based on a per-capita ratio. Accordingly, increasing population could necessitate additional staff resources. Fortunately, all of the land within the study area is central to the city and proximate to the full range of services including the large trunks and main lines which get smaller as they move farther out and serve less dense areas. As such, the same levels of growth in areas farther from the center of the city could have a greater impact.

Scenario 3 - Upzoning

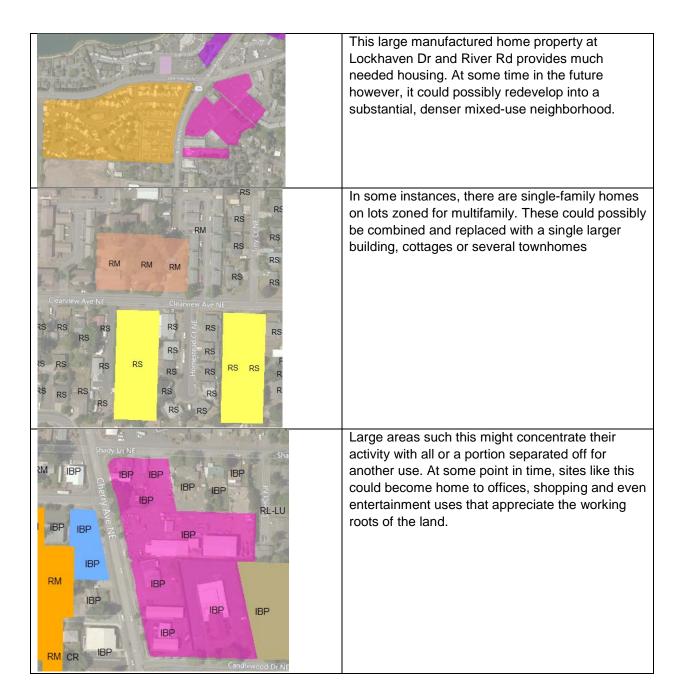
The third scenario continues to utilize the efficiency measures built into the optional development types. The differences lie in changing the development types assigned to strategic parcels. Some examples include:

- In some cases, large single-family lots may have enough land to allow the owner to add another unit, or build townhomes, rather than single-family detached homes
- A number of RM properties with low intensity developments could potentially be rezoned for mixeduse development.
- Likewise, some single-family properties near arterials and collectors could be consolidated and redeveloped as multi-story multifamily buildings.
- There may also be some opportunities for industrial properties to convert to mixed-use.

Below are several examples:



The area in yellow is developed but could have room for additional housing by combing lots and utilizing the large rear yards.

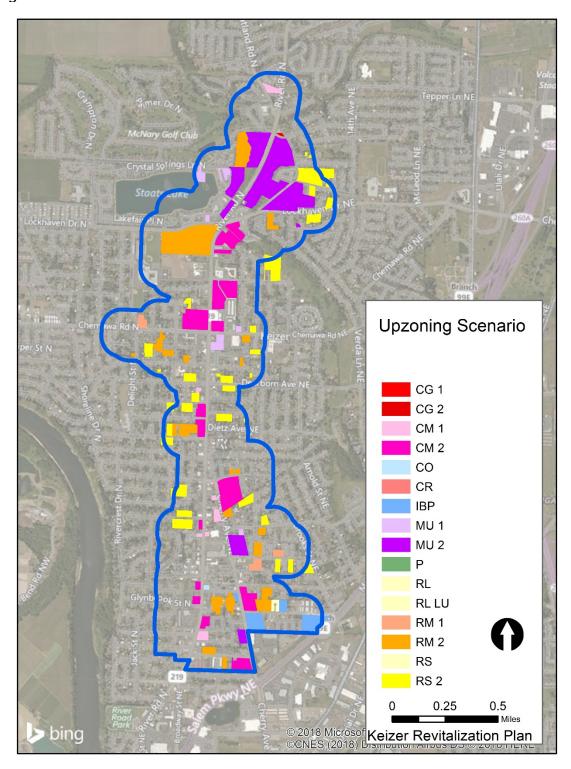


The third scenario adds another dozen acres of development to the study area. This higher intensity scenario rests on the assumption that increasing amenities and desirability of Keizer's core bring with them people that are willing to pay more per month to live close in. With increasing rent and lease rates, for both residents and commercial tenants, redevelopment becomes more feasible on properties that today would seem too expensive.

This scenario brings a significant increase in the amount of housing, climbing as high as 2,469 new units. The housing mix matches that of scenario 2 with 85% of new units in multifamily buildings even while it adds more than 125 new single-family units. Jobs likewise increase to 2,125.

The map of Scenario 3 (Figure 8) shows both an increase in the amount of land identified for potential development and a shift toward higher levels of housing and job activity.

Figure 8 - Scenario 3



Impacts to Infrastructure

Scenario 3 goes beyond simply finding capacity within existing zones; it assumes that some upzoning and new market desires will increase both the amount of land developed, and the level of use on those parcels. Additional growth will bring more trips. However, the increased mixed-use development in this scenario would <u>be</u> expected so the rate of driving per person decrease slightly. Similar to Scenario 2, some intersections could need upgrades sooner than planned, or see increased levels of congestion. The increased growth described by the scenario, rises to increase of 10% in terms of overall citywide

population. Such an increase could possibly be absorbed at a rate similar to that described by the TSP; traffic modelling will be required to identify where upgrades are needed, and to what degree the mixing of uses shortens trips or converts them to walk/bike or transit. This will be modeled in future phases of the project.

No needed infrastructure increases for sewer, water or stormwater have been identified other than on-site needs such as utility hook-ups, stormwater treatment and repairs to aging systems. However, with increases in usage, some upsizing could be needed. Public safety provision is based on a per-capita ratio. Accordingly, increasing population could necessitate additional staff resources. Again, all of the land within the study area is central to the city and proximate to the full range of services including the large trunks and main lines which get smaller as they move farther out and serve less dense areas. As such, the same levels of growth in areas farther from the center of the city could have a greater impact.

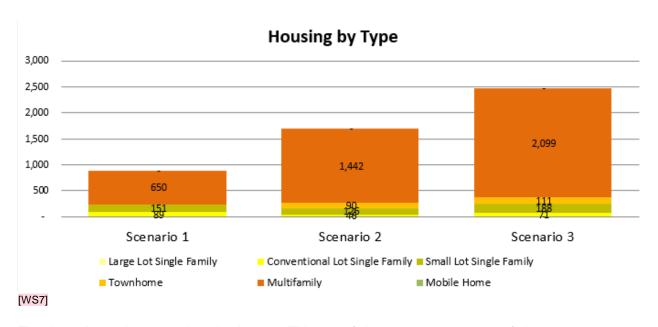
1.3 Comparison of Scenarios

The Envision Tomorrow software allows us to compare the scenarios through <u>a</u> number of key indicators. On the following pages we will examine how each performs in terms of the amount and types of growth, the composition of housing types, subsequent monthly costs, the types and amount of jobs, and how those jobs relate to the number of housing units provided.

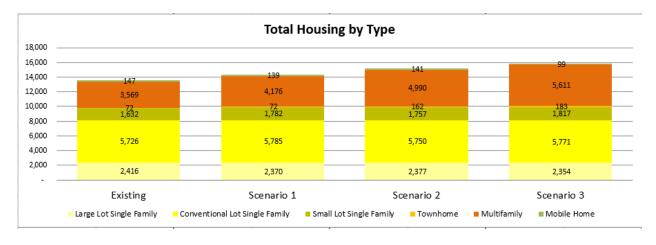
Residential Building Mix (new units)

	Scena	ario 1	Scena	rio 2	Scena	irio 3
Housing Mix						
Multifamily	650	73%	1,442	85%	2,099	85%
Townhome	-	0%	90	5%	111	4%
Small Lot Single Family	151	17%	126	7%	188	8%
Conventional Lot Single Family	89	10%	46	3%	71	3%
Large Lot Single Family	-	0%	-	0%	-	0%
Mobile Home	-	0%	-	0%	-	0%
Total Housing Units	889		1,705		2,469	

Total housing grew with each scenario. With the majority of the potentially developable land zoned for higher densities, the largest increases are in the multifamily housing.



The chart above shows new housing by type. This rate of change may appear out of character to many when they think of Keizer. It is a common situation in Oregon as single-family land within UGBs is consumed. This may be a concern for Keizer residents—does this type of housing match the needs and desires of residents both today and tomorrow?



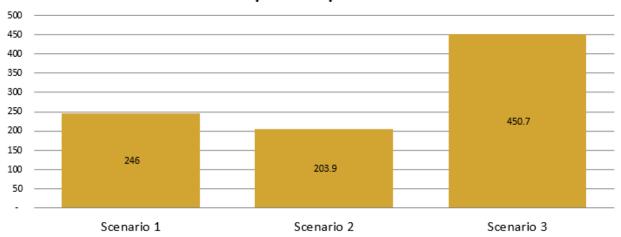
The chart above shows the total housing supply that would arise when adding the new growth to the existing homes already built (as opposed to new housing). It is worth noting that even though the new growth is predominately multifamily, these graphs show that even with this increase in multifamily units, the majority of the City's housing stock will be single-family homes.

Average Rent



The taller and mixed-use buildings that were introduced in the alternate scenarios are costlier to construct. Accordingly, monthly rents for these units is much higher. Even the \$1,224 from the Baseline Scenario may appear quite expensive. However, keep in mind that new buildings are generally built at the high end of the price range within the city. In addition to considering the change in scale, with a growing number of three and even five story buildings, cost is a consideration too.

Displaced Population



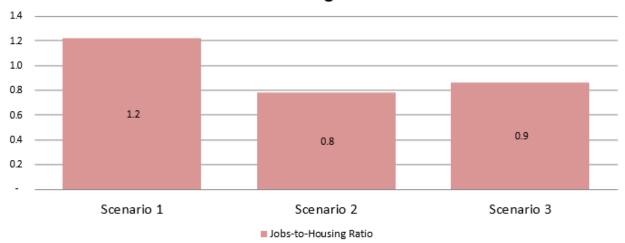
The scenarios all rely on some redevelopment. Doing so will undoubtedly mean that some residents will need to move as new development occurs. For the landowners that choose to redevelop their property, or add an additional unit to their lot, the choice is theirs. It is important to note that these people are not necessarily economically displaced, they may well have the means to return as renters to the new building, or they may move somewhere else nearby. However, rental residential buildings that redevelop are often also the ones with the lowest monthly rents. Consideration of where those people will relocate is an important consideration. The preceding charts shows that scenario 2 displaced fewer people than the Baseline. The second scenario included more redevelopment of non-residential commercial properties, converting them from commercial to mixed use. A strategy that focuses on redevelopment of underutilized commercial lands could interfere less with existing residents.

Employment Mix (new jobs)

	Scena	ario 1	Scena	ario 2	Scena	rio 3
Employment Mix						
Retail	212	20%	356	27%	556	26%
Office	842	77%	934	70%	1,519	71%
Industrial	34	3%	34	3%	28	1%
Public / Civic	-	0%	-	0%	-	0%
Educational	-	0%	-	0%	-	0%
Hotel / Hospitality	-	0%	12	1%	22	1%
Commercial Parking	-	0%	-	0%	-	0%
Total Jobs	1,088		1,336		2,125	

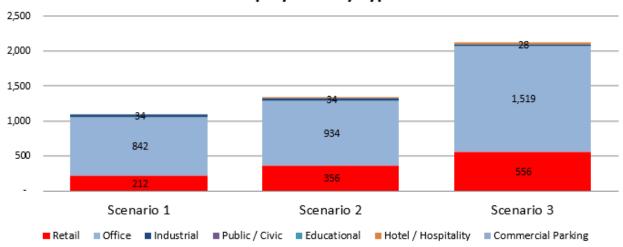
Job growth occurs at a slower rate than population growth. This is largely a result of the predominance of multifamily and mixed use zoning being utilized in the scenarios.

Jobs-Housing Balance



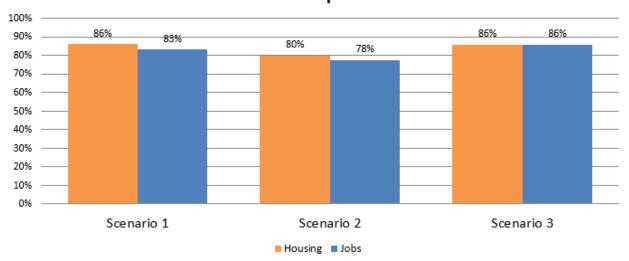
Keizer currently maintains a low job to housing ratio—approximately <u>0</u>.4 jobs per house. This is lower than most "bedroom communities". The Baseline represents, for the growth increment a desired ratio. The alternative scenarios, through their increases in housing do not improve conditions as much in this regard.

Employment by Type



Job growth among the schenarios scenarios maintains a similar form. Many economists suggest that a maximum of 10% of a city's jobs should be retail. Office and industrial jobs are considered more desirable for their positive impact on the taxbase and relatively higher wages for workers workers.

Redevelopment



Redevelopment is a term used to describe development that occurs on land that is currently being used or has been previously developed but is sitting idle or is not being used to its full capacity. Development only comes from two sources, vacant land development and redevelopment. This chart depicts the percent of development that occurred as redevelopment, as opposed to development of vacant land. All of the scenarios rely heavily on redevelopment to accommodate growth because there is scarce vacant land within Keizer. Interestingly, the efficiency measures of scenario 2, while redeveloping the same overall acreage, found room for more housing on vacant land by increasing the capacity within each zone.

2. Consistency with Project Goals and Objectives

This section evaluates the consistency of the Baseline Future scenario (Scenario 1) with the goals and objectives developed for the project in Revised Memorandum #1, presented below.

A Thriving, Diverse Corridor

- Zoning and land use regulations that provide opportunities for a variety of living-wage jobs.
- A range of goods and services for all.
- Supports existing businesses and new businesses including through implementation of public and private sector incentives, investments and partnerships.
- A variety of housing for the range of community member incomes, needs, and preferences.
- The creation of centers along the corridor, with transitions between them.
- A strong and unified identity communicated through streetscape design elements.
- Spaces for gathering and other places that celebrate the strength of community and family in the corridor.

Thoughtful Growth and Redevelopment

- Development (uses and design) that is consistent with Keizer's small-town character.
- A mix of uses that makes more efficient use of existing and new infrastructure.
- Proximity and mix of uses in development centers that community members can walk, roll, or drive (short distances) to access.
- Public improvements and private development that create an attractive, distinctive identity for the area.

Excellent Transportation and Public Facilities

- A balanced set of transportation options, including transit, walking, bicycling, and driving that provide good access to development centers and public spaces in the corridor.
- Transit access focused at development centers in the corridor.
- Enhanced safety and minimal conflicts between different types of transportation modes.
- Well-maintained roads that control and mitigate traffic congestion.
- Well-maintained streets, and bicycle and pedestrian facilities.
- Friendlier environments and slower traffic speeds that help facilitate walking and rolling on River Road and Cherry Avenue, through landscaping, crossings, and fewer driveways.
- Enhanced access to parks and the creation of gathering spaces that are accessible to all community members.

The Baseline Future scenario has produced indicators described in the previous section of this report. The goals and objectives above do not all relate to indicators from the scenario. However, the following types of scenario indicators relate to the goals and objectives: land use mix, housing and jobs numbers, density and centers, efficient use of resources, and transportation impacts.

Land Use Mix

Housing and employment mixes (percentages) shift to some extent between existing conditions and Baseline Future conditions. In terms of housing, an increase in multifamily housing from 26% to 30% corresponds to reductions in large lot and conventional lot single-family housing. Percentages of small lot single-family, townhome, and mobile home housing remain essentially unchanged. For employment, office jobs pick up from 35% to 42% of total employment, offset by reductions in retail (from 35% to 32%), educational, and hotel/hospitality jobs. Percentages of industrial and public/civic jobs do not change.

Increasing the multifamily share of the housing mix moves in the direction of the project goals and objectives. However, increases in townhome and small lot single-family housing and perhaps an even greater increase in multifamily housing would move even further toward creating more housing variety available to the range of income levels and needs in the community. Similarly, reducing the share of retail

jobs in exchange for more office and other professional jobs moves in the direction of project goals and objectives. Fostering even more office, education, public/civic, and industrial jobs moves further in providing more living-wage jobs.

Scenarios 2 and 3 provide more variety in that they provide townhomes (none assumed in Scenario1) and make more efficient use of land in providing significantly more multifamily housing. The scenarios may not be as consistent with small-town character in providing more multifamily housing (particularly for Scenario 3) and much less small lot and conventional lot single-family housing.

Jobs and Housing

A balance of jobs and housing in a community is considered beneficial in reducing commute times and vehicle miles traveled, encouraging less single-driver commutes, providing job opportunities for workers without vehicles, reducing traffic congestion, and improving air quality.² A jobs/housing ratio in the range of 0.75 to 1.5 is considered balanced. It is estimated that the existing jobs/housing ratio in Keizer is approximately 0.48 and is approximately 0.51 under Baseline Future conditions[ws9]. While these ratios may be somewhat less than what is considered balanced and may not be as strongly consistent with project goals and objectives, it is an important community discussion to determine to what extent it is desired to shift from being a "bedroom" community, which seems to be a quality that has drawn many residents to Keizer to date.

Given redevelopment assumed to occur as part of the Baseline Future scenario, the amount of redeveloped housing, displaced population, and displaced jobs is estimated as part of the scenario. In the Future Baseline scenario, it is estimated that about 90 units of housing would be redeveloped and that approximately 200 residents could be displaced and approximately 250 jobs could be displaced. While displacement is not necessarily a desire, goal, or policy of the City, it is typically an element of redevelopment, which is consistent with project goals and objectives. Given the amount of new housing and new jobs expected as part of the Baseline Future, some of this displacement should be offset as people displaced people move into new housing units in the area. Addressing displacement beyond that will require considerably more resources and proactive measures.

Consistency with small-town character and accessibility to a range of incomes may be more challenging in Scenarios 2 and 3 where rents are higher. Scenario 2 is more consistent with these goals/objectives in that its rate of displacement is lower than Scenarios 1 and 3. Scenario 3's rate is the highest of them all, the least consistent with those particular goals/objectives. However increasing housing costs are experienced across all housing types.

In terms of providing of variety and mix of uses, Scenarios 2 and 3 could be viewed as less consistent in that their job/housing ratios are lower than Scenario 1.

Employment

Scenarios 2 and 3 can be seen as more consistent with the goals/objectives to grow all business in that they provide many more jobs than Scenario 1. However, they can be seen as less consistent with the objective of creating more living-wage jobs in that the share of office and industrial jobs goes down with each successive scenario.

Density and Centers

Density, including people, housing, and jobs per acre, slightly increases in the Baseline Future Scenario. Housing units per acre moves from 5.5 to 5.7 and jobs per acres moves from 11.8 to 12.8. These increases move in the direction of the project goals and objectives. However, at least in "centers" of

² US Environmental Protection Agency, "EnviroAtlas" (November 2014). Accessed July 16, 2018. https://enviroatlas.epa.gov/enviroatlas/DataFactSheets/pdf/Supplemental/EmploymentHousingRatio.pdf

desired greater density, these densities could be further increased to be even more consistent with goals and objectives.

Previous planning efforts, including the McNary Activity Center Area Plan and the River Road Renaissance Plan, have explored the idea of districts and centers in the River Road corridor. Development projected in the Baseline Future scenario is comprised of development of vacant property and redevelopment of properties with lower improvement-to-property ratios or whose redevelopment potential is strengthened by allowing more uses and more lot coverage. In general, concentrations of these development/ redevelopment areas occur around McNary Estates, Lockhaven Drive, Chemawa Road, and the north end of Cherry Avenue near the Cherry Avenue/River Road split. Centers that could be developed in these areas would be consistent with the project goals and objectives focused on creating centers.

Efficient Use of Resources

There are several indicators produced as part of the Baseline Future scenario that speak to the efficient use of resources on a per household basis. These indicators include energy use, water use, waste water generated, and solid waste generated. On all of these fronts, the Baseline Future is estimated to more efficiently use resources and generate less waste per household than in existing conditions, which is consistent with project goals and objectives. This trend is most dramatically exemplified by water used specifically for landscaping, which is estimated to be half of current usage.

Transportation Impacts

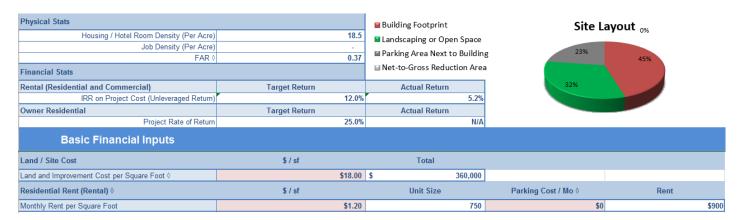
As described above, growth depicted by the Baseline scenario aligns with the TSP and is therefore clearly in support of the mobility, safety and quality of life goals and policies it describes. The increased growth in the two alternative scenarios is not so great as to likely play a significant threat to mobility goals. However, additional growth could bring the need for project development to occur sooner than planned, and new mobility improvements identified. Both of the alternative scenarios include more compact growth and a greater on-site mix of uses. These two variables support several of the TSP's desired outcomes of lower automobile trip generation and shorter trips, coupled with increased potential walking, biking and transit that come with improved urban conditions[ws10].

3. Impediments to Implementation

This section discusses potential impediments to implementing the project goals and objectives discussed in the previous section. Impediments discussed here include market conditions, public facility and service capacities, and City policies and regulations. This report focuses particular attention on the potential impediments that Keizer's Development Code may present to reaching the community's goals for the study area.

3.1 Market Conditions

The achievable monthly rent or lease rates drives the real estate development market. Keizer's average rents have been growing, but are estimated at only \$1.20 per month, per square foot. This would translate to a common apartment of 750 square feet renting for \$900 per month. While it may sound like a lot of money, such rent levels will not justify new construction. Simply put, the rate of return will not be high enough for a bank to loan on the aproject at that rate. The table below is taken from the Proforma Builder from Envision Tomorrow. It shows a 2-story apartment project, built within the RM zone would likely generate a return of 5.8%. Development is a risky business and to finance a project the builder would need to get closer to 10 or ideally 12 percent return on the investment.



In order for this project to "pencil out" or make financial sense at a modest 10% rate of return, the rents would need to rise to \$1.70 per square foot. This equates to that same 750 sf apartment renting for \$1,273. Fortunately, the average of \$1.20 per sf is a citywide average, including older properties and those without access to amenities such as those found in the study area. There are a number of properties in the area listed on Craigslist today that advertise rents around \$1.40 per sf There are many more factors to consider than simply rent levels as well. For this pro-forma example, we are assuming that the developer purchases a one-half acre lot for \$360,000 and spends \$120 dollars per square foot to construct the project. If eur a developer already owned the land, and also selected a more economical level of design and construction, the rent level required for financing would drop. The take-away from the above discussion is that the market in Keizer is considered soft but rising. Low-rise apartments and commercial buildings can and are being built. However, taller buildings, especially the desirable mixeduse buildings will need to rely on rent and lease rates higher thant we are seeing today. This financial gap can be made up in numerous ways in the nearer term, such as development partnerships, tax advantages, or relaxing some requirements. However, ultimately Keizer's core needs to become a destination and place where more people want to be. That will then bring in the tenants whose monthly budgets can support the new construction.

3.2 Public Facilities and Services

Public facilities were discussed in Section 1 of this memorandum as applied to each scenario. Generally, no specific public facilities comprise a barrier to development of any of the scenarios. As mentioned, Keizer's water system enjoys ample capacity as does the sewer system owned by the City of Salem. Any development will place additional load on a-government agenciesy. Police and fire service ratios dictate the number of staff based on population, with growth in the agencies coming as the number of rate payers increases. As discussed earlier, the central nature of the study area means that new residents and employees are served by existing police and fire stations and existing service areas, meaning that call times would be expected to remain the same.

Other services, such as park staff to operate and maintain parks, or planning and public works staff to keep the city working do not automatically grow with population. Accordingly, growth at any level could necessitate additional government expenses. Further, investment in staff growth may be necessary to achieve some of the desirable outcomes such as increased employment opportunities that could happen with dedicated economic development staff, or a high level of design that would require architectural expertise.

3.3 Transportation Plans

Stakeholders to this process have described traffic as being a significant issue. However, the traffic levels seen today are within normal levels for communities across the State. The TSP for example describes all of Keizer's signalized intersections as being "Under Capacity", with only Lockhaven / 14th, and The Parkway at Verda rising to "Over Capacity" by 2031. Two-One stop-controlled intersections Verda at Lockhaven and at Chemawa-will be "Over Capacity" as well, but signal izations would likely resolve those that conditions [WS11].

Traffic volumes or related delays do not themselves present barriers to development. Continued efforts to redesign the corridor for better walking, biking and transit, perhaps even resulting in lower speeds could potentially help make the area more attractive to shoppers/diners and future residents.

3.4 Comprehensive Plan

Memorandum #1 reviewed existing Comprehensive Plan goals and policies. These goals and policies support this planning project, key examples of which are listed below.

- Conserve resources by encouraging orderly development of land by adopting efficiency measures that will further allow for the efficient use of urban land.
- Provide a development pattern that:
 - b) Encourages affordable housing.
 - c) Creates a town center for Keizer.
 - d) Creates new employment opportunities in Keizer.
- Provide residential land to meet a range of needed housing types.
- Provide areas intended for development that combines commercial and residential uses in a single building or complex... Development is intended to be pedestrian-oriented with buildings close to and oriented to the sidewalk. Parking may be shared between residential and commercial uses.

While existing Comprehensive Plan goals and policies are not necessarily impediments to revitalization of the project area, project-specific goals and objectives proposed in Memorandum #1 provide greater detail and direction. These goals and objectives strengthen the support of existing Comprehensive Plan goals and policies.

3.5 Development Code

One of the most important opportunities for Keizer to realize its vision and goals for the River Road / Cherry Avenue corridor is through private development. New development on vacant sites and redevelopment of underused sites has the potential to bring new housing and jobs to the corridor, as well as bringing opportunities for shopping, dining, recreation, and community gathering—all of which contribute to a thriving and diverse corridor. New development also has the potential to reshape the area's urban form with improvements to the aesthetics and function of sites along the corridor. The key regulatory mechanism for shaping these outcomes is the Keizer Development Code (KDC).

Though the KDC is intended to facilitate development that is in line with the community's long-term vision for Keizer, it can also present impediments to realizing this vision. Code-related impediments generally fall into two categories: (1) general impediments to development or redevelopment, and (2) impediments to the *type* of development desired.

Table 5 below lists applicable project objectives related to land use and summarizes key land use strategies for achieving those objectives. The table also lists potential impediments that were analyzed in the KDC. Note that not all of these items are necessarily impediments to development in Keizer. Discussion of the most likely potential impediments is provided on subsequent pages.

Table 5 - Land Use Objectives, Strategies, and Potential Impediments

Objectives	Land Use Strategies	Potential Impediments
A Thriving, Diverse Cor	ridor	
Variety of living-wage jobs	 Land and buildings for various industrial and office uses 	 Limited designation of industrial office zoning districts Limited permitted industrial / office uses
Range of goods & services	 Land and buildings for various commercial uses Nearby residences to support commercial businesses 	 Limited permitted commercial land uses Lack of proximity of commercial and residential land uses
Variety of housing	 Variety of housing types: single- family, duplex, triplex, townhomes, multifamily, ADUs 	 Insufficient residential zoning capacity Limited permitted housing types within zones Insufficient density standards Site standards that limit density (landscaping, lot coverage, parking, setbacks)
Creation of centers	 Pedestrian-oriented design elements Connected to transit stop Mixed land uses within walking/biking distance of housing Public spaces A mix of housing types and densities (with overall net density target, e.g., min. 12 units per acre) 	 Site and building design standards that are not pedestrian-oriented No requirement for active ground floor uses No requirement or allowance for public space Limited mixed-use zoning Lack of proximity of commercial and residential zones Low minimum and maximum density standards

Objectives	Land Use Strategies	Potential Impediments
		 High minimum parking requirements
Gathering places	Family recreation usesPlazas and pocket parksOutdoor dining	 Zoning that does not permit family recreation uses Zoning that does not allow or encourage plazas, pocket parks, or outdoor dining
Thoughtful Growth & Re	edevelopment	
Consistency with small- town character	 Limited-scale buildings Limited-scale commercial uses Building design that reflects historic main street patterns 	 Building standards that allow for very tall buildings No limits on commercial floor area Building and site design standards that are not pedestrian-oriented
Efficient use of infrastructure	Compact development	 High minimum lot area requirements Low minimum and maximum density standards Development standards that limit density (landscaping, lot coverage, parking, setbacks)
Proximity & mix of uses	 Mixed-use sites or mix of uses 	Limited mixed-use zoning
in centers	within close proximity	 Lack of proximity of commercial and residential zones
Attractive, distinctive identity for the area	Design regulations	 Lack of site and building design standards that require unique design elements
Excellent Transportation	and Public Facilities	
A balanced set of transportation options, including transit, walking, bicycling, and driving that provide good access to development centers and public spaces in the corridor. / Well-maintained streets and bicycle and pedestrian facilities.	 Standards for on-site pedestrian, bicycle, and vehicle circulation Standards for pedestrian and bicycle connections to adjacent sites and to the sidewalk/street Provisions for cross-access easements and shared driveways Requirements for frontage improvements, including dedicating needed right-of-way and upgrading sidewalks 	 Limited provisions for on-site circulation, pedestrian/bicycle connections from the site, and shared vehicle access points. Easily deferred or waived frontage improvement requirements.
Transit access focused at development centers in the corridor.	 Orientation of building to transit stop Connection between building and transit stop Requirements for coordinating with transit agency regarding provision of transit stop amenities 	 Limited or no requirements regarding orientation to or connections with transit stop No requirements regarding provision of transit stop amenities

For analysis purposes, potential regulatory impediments identified in Table 5 have been grouped into categories listed below. Some of these categories also reflect inputs and outputs of the Baseline Future scenario, while other categories address elements of urban form and pedestrian orientation that are not represented in the scenario. In addition to the potential impediments identified in Table 5, there are

general potential impediments that relate to how efficient, understandable, and flexible the code is for applicants and administrators in the development process. Those categories are included in the list below as well.

- Existing zoning
- Permitted uses
- Site standards
 - Lot size, density, and floor area ratio
 - Lot coverage and landscaping
 - Setbacks (including provisions for pedestrian-oriented spaces)
 - Pedestrian connections
 - Parking
- Building standards
 - Building and entrance orientation
 - Active ground floor uses
 - Glazing
 - Weather protection
 - Architectural detailing
 - Height
- Frontage improvement requirements
- Code structure and administration
 - Use standards
 - Multiple mixed-use zones
 - Design standards and guidelines
 - Review procedures

Other potential impediments to implementing the goals and vision of the Keizer Revitalization Plan include factors that are land- and development-related but are outside the scope of what will be addressed by development code provisions. For example, the availability or assembly of large parcels may be key to significant development or redevelopment in the study area. These ideas are addressed in Section 3.1 of this report.

The following sections discuss the most likely potential code-related impediments in the categories listed above. The analysis focuses primarily on the commercial and mixed-use zoning chapters of the KDC, as well as chapters with associated development and design standards.

Existing Zoning

Table 6 lists the zoning designations applied to properties within the Keizer Revitalization Plan study area, and indicates the number of parcels in each zone. Because of the way the study area boundary was created, the Single Family Residential (RS) district has the greatest number of parcels by far, followed by Medium Density Residential (RM). However, the analysis in this section will primarily focus on the commercial and mixed-use zoning districts, since these zones account for the majority of the land directly adjacent to the River Road / Cherry Avenue corridor. The analysis will provide a more general overview of potential impediments in the residential and industrial zoning districts.

Among the commercial and mixed-use zoning districts, the zone applied to the greatest number of parcels is Commercial Mixed Use (CM), followed by Mixed Use (MU) and Commercial Office (CO). Commercial Retail (CR) and Commercial General (CG) zoning apply to a limited number of parcels. Keizer's zoning map (zoomed in on the study area) is presented in Figure 9.

Constraints of Existing Zoning

City of Keizer staff raised the physical constraints of zoning in the River Road / Cherry Avenue corridors as a potential impediment to redevelopment. As shown in the zoning map in Figure 9, there are some segments of the corridor where the commercial/mixed-use zoning is only one to two parcels deep. In

some areas, RM zoning provides a transition between commercial and single-family zones, but in other areas, single-family zones are directly adjacent to commercial zones.

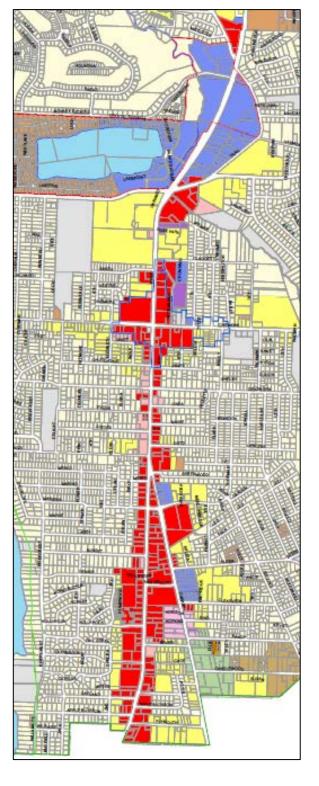
This creates several challenges to higher-intensity redevelopment: (1) it limits the overall number of sites that are available for redevelopment; (2) it limits opportunities for development on multiple lots or consolidation of lots; and (3) it creates a greater need for buffering or compatibility standards where commercial sites are adjacent to single-family residential sites, which limits development potential for those sites. As discussed in Section 4 of this memo, the City may want to consider a mechanism for increasing flexibility along the edges of the commercial/mixed-use zones or expansion of those zones.

Table 6 - Zoning Designations in Study Area by Number of Parcels

Figure 9 - Keizer Zoning Map

Zoning Designations	Parcel Count
Single Family Residential	1,322
Medium Density Residential	297
Commercial Mixed Use	230
Mixed Use	121
Limited Density Residential	57
Commercial Office	34
Industrial Business Park	32
General Industrial	32
Commercial Retail	15
Commercial General	8
Total	2,148





Permitted Uses

The following project objective statements are related to permitted uses within the study area:

- Zoning and land use regulations that provide opportunities for a variety of living-wage jobs.
- A range of goods and services for all.
- A variety of housing for the range of community member incomes, needs, and preferences.
- The creation of centers along the corridor, with transitions between them.
- A mix of uses that makes more efficient use of existing and new infrastructure.
- Proximity and mix of uses in development centers that community members can walk, roll, or drive (short distances) to access.

These objectives are associated with the following land use strategies: mixed-use development, a mix of uses within centers, employment uses (industrial and office), a variety of commercial uses, and a variety of residential uses. Table 7 provides a summary of permitted uses in selected zones in the study area.

Table 7 - Permitted Uses, By Zone

Zoning Designations	Permitted Uses (General)					
Single Family	Detached single family					
Residential (RS)	Special Permitted Uses:					
	Duplex on a corner lot					
	Shared housing facilities					
	Zero side yard dwellings					
	Conditional Uses:					
	 Cottage cluster development (with or without creation of new lots) 					
Medium Density	Detached single family					
Residential (RM)	Multifamily buildings					
	Special Permitted Uses:					
	Shared housing facilities					
	Zero side yard dwellings					
	Cottage cluster development (without creation of new lots)					
	Conditional Uses:					
	Cottage cluster development (with creation of new lots)					
Mixed Use (MU)	Residential uses alone					
	Residential + one or more other permitted uses					
	Retail					
	 Professional services 					
	Special Permitted Uses:					
	Shared housing facilities					
	Zero side yard dwellings					
	Cottage cluster development (without creation of new lots)					
	Mobile food vendor					
	Conditional Uses:					
	Craft industries					
	Cottage cluster development (with creation of new lots)					
Commercial Mixed Use	Residential uses alone					
(CM)	Residential + one or more other permitted uses					
	• Offices					
	Retail					
	Business, professional and social services					
	Special Permitted Uses:					
	Shared housing facilities					
	Zero side yard dwellings					
Commercial Office (CO)	Residential uses alone					
	 Various office uses 					

Zoning Designations	Permitted Uses (General)						
	Some office-supportive commercial uses (such as beauty/barber						
	shops and newsstands)						
	Special Permitted Uses:						
	Zero side yard dwellings						
	Mixed-use buildings						
Commercial Retail (CR)	One dwelling unit in conjunction with commercial uses						
	Various retail & commercial uses						
	 Various office uses 						
	 Various professional services 						
	Special Permitted Uses:						
	Gas station						
	Mobile food vendor						
	Conditional Uses:						
	Certain automotive and repair uses						
	Certain manufacturing uses						
Commercial General	One dwelling unit in conjunction with commercial uses						
(CG)	Retail						
	Professional services						
	Special Permitted Uses:						
	Gas station						
	Mobile food vendor						
	Conditional Uses:						
	Craft industries						

Mixed-Use Development

Three of the zoning districts in the study area allow some type of mixed-use development. The MU and CM districts allow residential uses, both alone and in combination with another permitted use on the same site. The CO district allows residential uses, and allows mixed-use buildings as special permitted uses. The CR and CG zones merely allow one dwelling unit in conjunction with commercial uses on a site.

Although these zones *permit* a mix of residential and commercial/office uses, there is no requirement or incentive for developing mixed-use buildings or sites. There is no requirement, for example, for commercial uses on the ground floor of buildings, with housing units above[WS12].

Housing Variety

As mentioned above, the MU, CM, and CO districts each allow residential development, in addition to the residential RS, RL, and RM zones. The RM zone permits medium-density multifamily buildings, but also allows single-family dwellings. The RS zone permits zero side yard dwellings (i.e., townhomes), but requires average lot size in a development to meet minimum lot size and density standards, thus limiting the conditions under which townhomes can be developed. The RS zone also does not permit other forms of "missing middle" housing (multi-unit or clustered housing types compatible in scale with single-family homes[WS13]) that could add flexibility for residential development along the edges of the study area. Key impediments for reaching the project goal of providing a variety of housing options may lie both in expanding compatible residential uses that are permitted in the RS zone and modifying the KDC's density standards, which are discussed below.

Employment

Permitted uses within Keizer's commercial and industrial zones are typical, albeit existing zoning is not focused on office and industrial uses in the corridor (i.e., there is only so much land zoned CO, IBP, and

IG). Otherwise, impediments related to permitted uses have not been identified for employment uses. The impediments to attracting more employment are more likely to be market-based.

Development and Design Standards

Implementation of various development and design standards combine to create attractive, efficient urban development and development that is pedestrian-oriented, which are goals of this planning project. For the purposes of discussion, these standards are separated into site standards and building standards in the following subsections.

Site Standards

Lot Size, Density, and Floor Area Ratio (FAR)

As is shown in Table 8, minimum lot sizes for the residential zones and residential uses in the study area are generally 4,000-6,000 square feet. These lot sizes are not excessive for low-density residential uses but would preclude housing such as "skinny lot" single-family housing (e.g., homes on lots that are 25 feet by 100 feet).

Density standards in the residential zones and zones that allow mixed uses generally run from 8 units per acre to 24 units per acre. These standards could be raised (e.g., the City has a High Density Residential zone with a minimum density standard of 16 units per acre and no maximum density standard). Higher densities were part of the "efficiency measures" used in generating Scenario 2, where densities for multifamily and mixed-use residential building prototypes were set higher than 24 units/acre. The existing maximum density standard appears to be a constraint on development and redevelopment as are market conditions and other development standards such as setbacks, minimum parking requirements, and minimum landscaping standards.

Floor area ratio (FAR) standards regulate density for commercial and mixed uses. Neither minimum or maximum FAR standards are currently established in the KDC for zones in the study area. There is a question of whether setting minimum FAR standards would be effective absent improved market conditions and more permissiveness in other development standards.

Lot Coverage and Landscaping

The KDC establishes minimum landscaping and maximum lot coverage standards for each zoning district. Lot coverage refers to the percentage of total lot area covered by buildings, accessory structures, and paved parking areas. Lot coverage and landscaping standards should add up to 100%. Sites with high lot coverage percentages—or more precisely, high building coverage—tend to have a more urban feel.

Lot coverage and landscaping standards for the commercial and mixed-use zones vary based on the use of the site (see Table 8). Maximum lot coverage ranges from 75-80% for residential only development to 85-90% for commercial development. The CM and CO zones are the only zoning districts with standards for minimum lot coverage—50% for both [ws14].

Lot coverage rates could be raised—and, accordingly, landscaping rates could be dropped—in an effort to create a more urban and pedestrian-oriented environment. However, developments have to devote a significant portion of their sites (and lot coverage allotment) to surface parking in order to meet existing minimum parking requirements. Therefore, a higher lot coverage requirement will not necessarily achieve the more urban feel that is desired along the River Road/Cherry Avenue corridors without reducing off-street parking requirements[WS15].

Setbacks

Generally speaking, a small or no front yard setback creates a more urban and pedestrian-oriented environment. Exceptions could be made to increase the front yard setback where pedestrian-oriented

uses—seating or a plaza, for example—are provided. In that vein, required front yard setbacks for commercial and mixed-use zones (and for non-residential uses in the RM zone) in the study area (Table 8) could be viewed as larger than desired for creating a more urban, pedestrian-oriented environment and implementing the goals and objectives of this project.

Approaches to this potential impediment could entail one or a combination of the following: reducing minimum front yard setbacks, establishing maximum setbacks,³ or not allowing parking between the building and the street, which property owners may respond to by bringing the building up or close to the property line.

Other setbacks, in particular rear setbacks, can be a barrier to efficient, compact development, another element of the project's goals and objectives. For example, 20-foot rear setbacks are required in the RM zone, which would be more appropriate in a suburban setting than in an urban core corridor. The largest rear setbacks as recommended in the State of Oregon Transportation and Growth Management Model Development Code for Small Cities, 3rd Edition ("Model Code") are set between 10-15 feet in residential zones (depending on building height) and, in commercial and mixed-use zones, either at 0 feet or 10 feet (if adjacent to low-density residential zoning). Setbacks were manipulated in creating future development scenarios and can be considered for reductions in the implementation phase of this project.

Pedestrian Connections

Pedestrian connections between the site and the sidewalk/street and, where appropriate, between adjacent sites are key to fostering pedestrian-oriented development and supporting the goals and objectives of this project. Existing code (KDC Sections 2.315.06.A and F) establishes requirements for such connections, including specifying these connections between sites and streets with transit stops or facilities within 600 feet. Thus, existing code should not act as an impediment, with perhaps the exception of providing more detail about the spacing/frequency of walkways through parking areas when connecting the site to the street or adjoining sites.

Parking

Parking is a significant factor in implementing project goals and objectives in terms of where vehicle parking is located, the amount of vehicle parking that is required, and provisions for bicycle parking. Special provisions in existing code regarding the location and amount of vehicle parking are noted in Table 8.

Location of Vehicle Parking

Locating parking to the side and rear of buildings creates less of a barrier between buildings and the street, making for a more urban and pedestrian-oriented environment. As noted in the Setbacks subsection, prohibiting parking between the building and street can also have the effect of pulling buildings up to or close to the property line without having to necessarily reduce minimum front yard setbacks or create maximum setbacks. Currently, parking to the side and rear of buildings is not required in the zones in the study area except for the CO zone.

Amount of Vehicle Parking

Existing minimum off-street parking requirements (ratios): for key existing or potential uses in the study area including the following:

Single family	2 spaces per unit
Multifamily	1 space per 1 bedroom unit + 1 additional space for every 10 units or
	1.5 spaces per 2 or more bedroom units + 1 additional space for every
	10 units

³ Maximum setbacks are not established in zones in the study area except a 10-foot maximum setback for property fronting Cherry Avenue in the MU zone.

Recreation facility	1 space per 200 square feet
Health services/offices	1 space per 350 square feet
General offices	1 space per 500 square feet
Personal services	1 space per 350 square feet
Retail	1 space per 300 square feet
Bulky retail	1 space per 900 square feet
Wholesale retail	1 space per 2,000 square feet
Eating/drinking establishment	1 space per 125 square feet

There are cases where spaces are not required for uses above the ground floor and just one space is required for residential units in some commercial and commercial/mixed-use zones, as shown in Table 8.

As discussed in the Lot Coverage subsection, barriers to more compact and efficient development include parking requirements. The Model Code provides some guidance for reductions to existing parking requirements, such as the following, although greater reductions may be needed to achieve more marketable, compact, and efficient development:

- 1 space per dwelling unit (where not already established);
- 1 space per 400 square feet for retail and per 1,000 feet for bulky retail;
- 1 space per 200 square feet for eating/drinking establishments; and
- 1 space per 300 square feet for recreation facility.

Reducing minimum parking standards and/or establishing maximum parking standards can be explored as part of implementation tasks in this project. These discussions can take into consideration existing provisions for parking flexibility, including the following.

- Reductions in parking requirements are permitted in the MU zone when demonstrated as appropriate in a parking analysis.
- Shared parking is allowed for commercial and industrial uses whose peak hours of parking usage are not the same.
- Parking in non-residential zones can be off-site within 500 feet based on a legal parking agreement.

Bicycle Parking

Current bicycle parking code requires one bicycle parking space plus one space per 5% of required vehicle parking spaces for public, semi-public, commercial, industrial, park-and-ride, and multifamily uses. An adequate amount of parking is critical to promoting riding and creating a multimodal environment in line with project goals and objectives. A higher percentage should be considered (e.g., 10-20%) in order to provide adequate bicycle parking.

Basic location, dimension, and lighting requirements are established in the City's code. However, in order to provide adequately and attractively designed bicycle parking, long-term, more secure, and weather-protected standards should be explored.

Building Standards

The building standards in this subsection have less to do with creating efficient, compact development and have more to do with creating the environment envisioned in the project goals and objectives. Building standards that are key to creating an attractive and pedestrian-oriented environment are summarized in Table 9 and are discussed below.

 Building and entrance orientation and accessibility – Buildings should be oriented towards the street (rather than towards parking lots) and entrances should be directly accessible from the sidewalk (and from intersections where applicable/possible). Existing code does not explicitly address

- building orientation in commercial and mixed-use zones, but does set pedestrian connection standards.
- Ground floor uses Active ground floor uses help create activity and vibrancy on the sidewalk and street outside the use. Commercial and mixed-use zones do not currently require active ground floor uses. However, development standards in the MU zone fronting Cherry Avenue south of Manbrin Drive restricts residential use to 35-65% of the building floor area.
- Glazing Related to active ground floor uses, a minimum amount of glazing (i.e., windows) provides transparency and a sense of activity and vibrancy. Three zones in the study area—the MU, CM, and CR zones—have minimum glazing requirements.
- Weather protection Weather protection (e.g., awnings) should be provided at entrances and along building facades to encourage walking and increased activity at the street level. Other than in the RS zone, development standards for buildings in the study area require that walkways within three feet of the building frontage be covered.
- Architectural detailing Architectural and façade detailing (e.g., articulation, building materials) lend to the visual interest and attractiveness of buildings. Existing code establishes some architectural detailing requirements, including window and façade standards (limited application), roof line standards, and building materials/colors. Additional requirements can be considered during the implementation phase of this project in order to more strongly distinguish the study area.
- Height Building height can provide a sense of enclosure desirable in a pedestrian environment, while stepbacks in height at upper levels and other building mass detailing and variation can help break up the building and keep it from feeling imposing. Existing maximum height requirements should be sufficient to allow for greater density envisioned in the study area. Stepbacks for the upper floors of the potentially tallest buildings can be explored as needed during implementation tasks.

Table 8 - Existing Site Standards, by Zone

Zoning Classifications	Use Type	Min. Lot Size (sf)	Min. Density (du/ac)	Max. Density (du/ac)	Min. Setbacks (ft)	Parking	Min. Landscaping	Lot Coverage
Single Family Residential (RS)	Res.	4,000 <u>* - 5,000</u> <u>*zero lot line</u>	4	8	Front: 10' Side: 5' Rear: 14' to 20' **		30%	Max. 70%
Medium Density Residential (RM)	Res.	43,000* - 9,000 *attached both sides	6 to 8 *		Front: 10' Side: 5' Rear: 14' to 20' **		25%	Max. 75%
	Non- Res.	N/A			Front: 20' Side: 10' Rear: 20'			
	Res.	43,000* - 6,000 *attached both sides			Front: 10' (min. 5', max. 10' on Cherry Ave.) Side: 5' to 10' Rear: 14' to 20' **	Parking requirement reduction up to 10% allowed if served by transit	Commercial: 15% MU: 20% Residential: 25%	Max. Commercial: 85% MU: 80% Residential: 75%
Mixed Use (MU)	Non- Res. / Mixed Use	N/A	8	24	Front: 10' Side & Rear: 0 adj to non-res.; 10' adj to res.	related amenities (reduction-also allowed through parking study for KZ station area C)		
Commercial Office (CO)	Res.	34,000* - 6,000 *attached both sides	8	24	Front: 10' Side: single family: 5'; other uses: match adjacent min. setback Rear: 14' to 20'	Located to side or rear (if side, 50% of frontage max.)	Commercial: 10% MU: 15% Residential: 20%	Max. Commercial: 90% MU: 85% Residential:

Zoning Classifications	Use Type	Min. Lot Size (sf)	Min. Density (du/ac)	Max. Density (du/ac)	Min. Setbacks (ft)	Parking	Min. Landscaping	Lot Coverage
	Non- Res. / Mixed Use	N/A			Front: 10' Side & Rear: match adjacent min. setback	No spaces required for uses above ground floor Res uses: 1 space/unit		80% Min. for all: 50%
Commercial Mixed Use (CM)	Res.	34,000* - 6,000 *attached both sides	ed both es 8	24	Front: 10' Side: 5' Rear: 0' (match adjacent min. setback)	No spaces required for uses above ground floor Res uses: 1 space/unit	Commercial: 10% MU: 15% Residential: 20%	Max. Commercial: 90% MU: 85% Residential: 80% Min. for all: 50%
, ,	Non- Res. / Mixed Use	N/A			Front: 10' Side & Rear: 0 (match adjacent min. setback)			
Commercial Retail (CR)		N/A	N/A	N/A	Front: 10' Side & Rear: (match adjacent min. setback)	No spaces required for uses above ground floor Res uses: 1 space/unit	10%	Max.: 90% Min.: 50%
Commercial General (CG)		-	-	-	Front: 5' Side: (match adjacent min. setback); street side: 5,' or 20' adjacent to collector or arterial Rear: (match adjacent min. setback, 0' for CG)	-	10%	Max.: 90%

^{*} Lower or higher density standards apply to land designated as Medium Density Residential or Medium-High Density Residential on the Comprehensive Plan Map respectively.

^{**} Lower or higher setbacks apply to one-story or two-story buildings respectively.

Table 9 - Existing Building Standards, By Zone

Zone	Building / Entrance Orientation	Glazing	Weather Protection	Architecture Detailing / Articulation Max. Height
Single Family Residential (RS)	Primary façade must face front lot line			 Front façade and garage/ carport design standards for single family housing Off-sets and recesses design options for primary facade
Medium Density Residential (RM)				 Front façade and garage/ carport design standards for single family housing Limits on building façade area and horizontal separation of multiple facades facing street or common building line with RS zone
Mixed Use (MU)	No standards specific to orienting building and entrance to sidewalk/street. For	Min. 50% of ground floor wall area	Walkways within 3' of a building frontage	 Front façade and garage/ carport design standards for single family housing Building material variation, off-sets, or wall area separation/ projections every 30'
Commercial Mixed Use (CM)	connections to the sidewalk/street, see Pedestrian Connections	Min. 50% of ground floor wall area	must be covered by a building overhang or awning	 Building material variation, off-sets, or wall area separation/ projections every 30'
Commercial Office (CO)	subsection.			50'
Commercial Retail (CR)		Min. 50% of ground floor wall area		Building material variation, off-sets, or wall area separation/ projections every 30' 50'
Commercial General (CG)				50' *

^{*} Required setbacks must be increased one foot for every foot that the structure height exceeds 35 feet.

Note: Several design standards that promote pedestrian-friendly design are found in Section 2.315 Development Standards. This section applies to all new development (except residential buildings with three or fewer dwelling units); certain design standards apply only to CM, CR, and MU zones.

Frontage Improvement Requirements

Ensuring that there is a clear process for requiring frontage improvements during the development application process aligns with project goals and objectives regarding excellent public facilities and an accessible multimodal transportation system. This includes setting clear thresholds for when improvements are required and establishing robust alternatives to constructing the improvements at the time of development if that timing is impractical.

Currently, the KDC includes frontage improvement requirements for partitions and subdivisions. However, it is not clear what frontage improvements would be required for development and redevelopment in the study area, if it is not a partition or subdivision; the Street Standards section states that the section does not apply "in existing developed areas of the City." More clearly establishing that frontage improvements are required and what frontage improvements are required (e.g., providing sidewalks and street trees to standard and dedicating right-of-way to standard) will help address this potential impediment. Frontage improvement requirements could be modeled after requirements in the partition and subdivision sections. Alternatives to providing physical improvements at the time of development could be further explored and expanded to include not just waivers of non-remonstrance but deferrals and fees-in-lieu.

In terms of other multimodal frontage improvements, it should be noted that there is an existing transit requirement in the Development Standards section of the KDC. New retail, office, and institutional buildings at or within 600 feet of an existing or planned transit stop must provide stop amenities or a connection to the stop where the transit agency has specified a needed improvement. Refinements of this requirement (e.g., more specificity about what types of amenities may be required or that the improvements must be identified in an adopted plan) can be explored as part of the implementation phase of this project.

Code Structure and Administration

Use Standards

A potential impediment related to use regulations is that the KDC regulates uses by providing lists of specific uses that are permitted, conditional, or prohibited in each planning district. In some cases, there are no corresponding definitions for the uses in the KDC[ws16]. The list of uses is relatively concise for residential planning districts, as development is primarily regulated through development standards such as minimum lot size, setbacks, and density. The lists of uses for commercial, mixed-use, and industrial planning districts, however, are long and unwieldy.

The existing approach to use standards has two primary disadvantages:

- The list of uses is not user-friendly. The user must review a long and detailed list of uses before determining that use which most closely corresponds to a proposed use. The narrow descriptions of the proposed use may leave some users uncertain if a proposed use is sufficiently similar to a listed use.
- The system is somewhat inflexible. Only the named uses are permitted, and a proposed use which might be appropriate for the zone but does not match a use in the list would be prohibited. For commercial and industrial uses, this inflexibility may be exacerbated over time as new products, services, and business models are not reflected in the list of uses.

These disadvantages may serve as impediments to redevelopment within the study area as they might make the development process more complicated and uncertain.

Multiple Mixed-Use Zones

While there is overlap between all five commercial and mixed-use zones that are focused on in this section of the report, there is significant overlap between the MU zone, the CM zone, and the CO zone, which all allow for mixed uses. This overlap and potential lack of clarity about what differentiates these zones may not significantly deter development applicants, but may lead to confusion. Clarification of these zones—whether through consolidation or greater differentiation—may help ease the development process both for applicants and administrators.

Design Standards and Guidelines

An impediment to getting the type and aesthetic of development that may be desired in the study area can be lack of distinctive design standards or guidelines for development. This idea is further discussed in the Implementation Measures section. Options for building upon existing design standards in the Development Standards section of the KDC, creating new standards specific to the study area as a new section in the KDC, and adding more discretionary design guidance (guidelines) specific to the study area can be explored, as can the potential relative cost burden of design standards.

Application Procedures

Generally, existing application procedures should not constitute an impediment to implementing project goals and objectives. The City of Keizer processes conditional use and development review applications through with Type I procedures, administrative procedures are carried out through staff review and decision.

Cottage cluster development involving the creation of lots or cottage cluster development in the RS zone (regardless of whether lots are being created) is subject to Type II-B review, a quasi-judicial process in which the Planning Commission is the discretionary review and decision body. While this level of review may be appropriate for cottage cluster development criteria, what may be more expeditious for getting these and other innovative housing development types approved can be further explored as part of implementation.

4. Potential Implementation Measures

One of the primary ways that Keizer can move closer to its vision and goals for the Revitalization Plan study area is to adjust its plan policies, zoning districts, and Development Code regulations. Section 1 of this memo discusses how potential modifications to development standards and allowed uses ("efficiency measures") and "upzoning" of properties can lead to different development outcomes. This section of the memo proposes potential implementation measures that the City could consider to address the impediments discussed in the previous section. The intention is to identify strategies that will help achieve more redevelopment and accommodate more growth within the study area (as modeled in the Scenarios 2 and 3 in Section 1), as well as to move closer to project goals for fostering a thriving, attractive, and pedestrian-friendly commercial core.

Allowing more growth and enhancing the River Road/Cherry Avenue corridors through enhanced design of public and private spaces is expected to produce a virtuous cycle. By allowing denser, more compact development, new residents will support the commercial core by visiting businesses and creating more activity. Increased activity and new attractive development with a more urban feel make an area more desirable, and thus higher rents are possible. With higher rents, different building types (e.g., mixed-use buildings) can be developed, which in turn make the area more desirable. This is why it is important to address not only the existing regulatory capacity for development, but also the regulations and investments that will enhance the area's aesthetics and pedestrian orientation and functionality.

The discussion of potential regulatory implementation measures looks at both conventional zoning approaches and more innovative approaches, including performance-based zoning and form-based code. Potential measures are also assessed in terms of their practical, financial, and market suitability.

4.1 Performance-Based Development Code

An alternative to the traditional, conventional zoning method, performance-based zoning regulates development by setting the desired goals or targets to be achieved by regulation rather than regulating how those targets are met. Instead of restricting specific uses on a property, performance requirements allow any use that meets the set standard. In the case of a performance-based zoning project in Fremont, California, a target number of jobs, number of housing units (including affordable housing units), and low carbon footprint standards were set for an approximately 900-acre parcel anchored by a planned BART station. The project is not subject to typical use standards and other development standards; the applicant must determine and demonstrate how they will meet the targets and standards.⁴ This approach to development regulation is an attempt to address the same goals desired by traditional zoning ordinances, such as environmental protection, neighborhood character, traffic control, etc., but with a greater amount of flexibility.

Assessment

While clearly innovative, performance-based zoning has a number of limitations. It seems most appropriate for the master planning of large, discrete sites under a single ownership (as is the case with the Fremont example discussed above). Since few such sites are available within the study area, performance-based zoning may not add much value in terms of increasing development potential. Due to its great flexibility, this approach may also require significant staff capacity to administer (i.e., evaluate whether the applicant will indeed meet adopted targets and standards and monitor applicant performance), and may be too unpredictable for applicants. As a radical departure from the City's current code, performance-based code would likely be costlier to develop, in terms of the staff time and public process required, and may be more challenging politically. Community members may find the unpredictability of outcomes disconcerting.

Keizer Revitalization Plan

⁴ https://www.citylab.com/equity/2014/08/braving-the-new-world-of-performance-based-zoning/375926/

From the market perspective, these can add flexibility for developers to come up with their own solutions within the set parameters. Added costs may come from the time and effort needed for the developer and architect to navigate this less familiar form of code. The performance measures must be carefully calibrated to remain feasible (i.e. not require an unrealistic number of housing units or jobs) or it becomes restrictive, rather than adding flexibility. It should also be noted that zoning is limited in its ability to directly impact job creation; rather, zoning impacts the creation of real estate space that can accommodate new jobs.

While this code approach may not be very suitable for this study area and planning project, other communities have included some performance standards in their conventional zoning structure. The idea of creating targets for the study area, or parts of the study area, can be further explored as part of implementation tasks. Another option could be to incorporate a menu and points-based system for meeting selected code provisions that effectively represent targets for specific types of design or other development characteristics.

4.2 Form-Based Development Code

A form-based development code (typically referred to just as "form-based code" [FBC]) uses physical form rather than emphasis on and separation of uses as the organizing principle for the code. The primary concern with this approach is how a development looks, functions, and relates to the street or other public spaces, rather than the specific use of the site. FBC is often associated with the New Urbanist movement and Traditional Neighborhood Development (TND). TND emphasizes compact, mixed-use, and pedestrian-oriented development, as well as human-scale design, town and neighborhood centers, public spaces, civic uses and other features that foster a sense of community. These concepts have become pretty well integrated into the current approach to zoning in many Oregon cities. Form-based code is one regulatory approach to implementing the concepts embraced by TND.

Form-based code is often applied to limited areas where a certain style of development is desired—such as transit-oriented development where compact, pedestrian-scaled development is prioritized, and a mix of uses is welcome. The approach has also been applied to entire cities, as is the case with Denver's citywide FBC, which was adopted in 2010. Elements of FBC—such as required build-to lines, minimum glazing, and prescribed architectural styles—have also been incorporated into cities' existing zoning code as design standards or guidelines. There is a spectrum of implementation options when it comes to FBC.

The Form-Based Codes Institute recommends that an FBC, at a minimum, consist of the following:

- A regulating plan
- Public improvement standards
- Building standards
- Administrative procedures
- Definitions

Optional code elements include architectural standards, signage standards, environmental resources standards, landscaping standards, and annotations/illustrations.⁵

Assessment

Form-based code offers many advantages that may be appealing to Keizer. For one thing, FBC's focus on development form may be well-suited to meet many of the project objectives that have to do with the appearance and function of development in the study area. These include the creation of centers along the corridor; attractive, distinctive identity; spaces for gathering; enhancing small-town character; and mixed-use development. FBC is also intended to be highly legible for users, with prescriptive design standards illustrated by clear graphics. This contrasts with many municipalities' conventional zoning

Keizer Revitalization Plan

Proft Memorandum #4: Con Angleia Otak | Angela Planning Group | Johnson Economics | Kittalson & Associates

⁵ <u>https://formbasedcodes.org/definition/</u>

codes, in which it can be very challenging to envision how development will appear once all the standards are applied.

A major drawback to FBC, however, is that it can often require a massive public effort to develop. The code is typically lengthy and highly detailed, with many illustrative graphics. For example, the Form-Based Standards for the Highway 99 Overlay District in Clark County, Washington is 170 pages in length. The sheer amount of code required is also likely to make it costlier and more challenging to administer. Because of these drawbacks, similar to performance-based zoning, adopting new form-based code for the study area may be politically challenging. In terms of legality in Oregon, there should not be particular concerns, and there are a number of precedents in other cities. For example, the City of Wilsonville recently adopted the Coffee Creek Industrial Area Form-Based Code in February 2018 and APG assisted the City of Eugene in preparing a form-based code chapter for the Walnut Station Area (near Franklin Blvd) in Eugene.

From the market perspective, form-based codes can add costs in the time and effort needed for the development team to interpret long or complicated codes. These added soft costs may make some development less feasible. Also, FBC must be carefully written to avoid unintended consequences of the required design elements being overly restrictive of the form and function of the underlying building.

Short of creating new KDC sections that are pure form-based code, there is an opportunity to emphasize building and site standards and provide higher levels of illustration/annotation in amendments that may be made to the KDC as part of implementation of the Keizer Revitalization Plan. These potential revisions to the KDC are discussed below.

4.3 Existing Development Code

In lieu of developing completely new performance-based or form-based code for the study area, the City may choose to make targeted improvements to the existing KDC. There are a range of resources available to aid in this effort including Transportation and Growth Management (TGM) publications. There are several approaches that the City could take in working with the existing code. These include amending or restructuring existing zones, creating a new overlay zone, and rezoning portions of the study area. In addition, the City could add or refine design standards and guidelines, or potentially add a new adjustment procedure. These approaches are discussed below.

Amending/Restructuring Existing Zones

Scenario Outcomes

In the scenario modeling that was summarized in Section 1 of this memo, Scenario 2 implemented various "efficiency measures," modifying or relaxing zoning standards in certain areas to allow either more intense development or a greater range of housing options. Targeted tweaks to zoning standards yielded fairly significant results; the alternate future modeled in Scenario 2 accommodated 1,705 new housing units, compared to 889 units modeled for the baseline future. By imposing fewer constraints on sites, it is not only possible to build larger buildings, it is also possible to accommodate building types that would not be feasible in existing zones. For example, in the CM zone, changes to the setbacks, lot coverage, and density allowed Scenario 2 to develop with 3-story mixed-use buildings, which would not be financially feasible in the baseline scenario. Similarly, in the MU zone, Scenario 2 allowed for both 3- and 5-story mixed-use buildings; five stories would not be possible with the current 50-foot height limit in the MU zone. In the RS zone, changes to minimum lot size allowed development of townhomes, cottage homes, and "skinny lot" single-family homes—thereby accommodating many more housing units in the singlefamily zone.

The efficiency measures that made the most significant changes to outcomes in Scenario 2 were: reducing setbacks; reducing parking requirements; reducing landscape requirements; and allowing greater residential density. In order to achieve these efficiency measures, the KDC could be amended to modify development standards for the existing zones within the study area. Possible amendments to site development standards are discussed below.

Site Development Standards

Since they made the most significant changes to outcomes in Scenario 2, setbacks, landscaping, parking, and density standards should be considered for potential amendments. The goal for those changes would be to allow more compact, efficient development, and to allow a wider variety of building types, including more urban-style mixed-use development. In addition, the impediments to meeting goals for a pedestrianoriented environment (as discussed in Section 3.5) should also be considered in potential amendments to the KDC. These standards are elaborated below.

Setbacks

The assumptions for the development types used in Scenario 2 generally included 5-foot front, side, and rear setbacks for multifamily development and 0-foot setbacks for mixed-use development; this would not be allowed by the current zoning code. While the City may not wish to reduce setbacks to this extent, even smaller reductions could yield significant results. Front and rear setbacks are of particular interest. In the MU, CM, and CO zones, the minimum front setback is 10 feet; this may not foster the type of active frontage that is engaging to pedestrians. The City could consider reducing this minimum to 0 or 5 feet. The City could also establish a maximum front setback to ensure that buildings are sited closer to the sidewalk. As discussed below, these modifications could be made for entire zones, or only within certain areas.

In the CM, MU, and CO zones, the rear setback for multifamily buildings is 20 feet. For commercial or mixed-use buildings adjacent to a residential zone, the minimum rear setback is equivalent to the rear setback for the adjacent zone. Because the commercial zoning in the study area is relatively narrow in many places, there are a lot of CM/CO properties that are adjacent to RS or RM zones, and therefore are required to have 14-20 foot rear setbacks. The intent of the larger rear setback is to create a buffer between commercial and residential properties; however, landscape buffers are already required adjacent to residential uses. A different approach could be to require transition features (such as building stepbacks) when commercial/mixed-use development is adjacent to residential uses.

Minimum Landscaping

The Scenario 2 efficiency measures included reducing the landscaping coverage assumptions—typically to 25% for single-family townhomes, 15% for multifamily buildings, and 5% for mixed-use buildings. The KDC's existing landscaping standards would require 30%, 25%, and 15-20% landscape coverage, respectively, for these development types. When combined with other requirements, like minimum parking, this seriously limits the development potential of sites, and may not be desirable for portions of the study area where a more urban feel is desired. The Model Code recommends minimum landscaping of 10% for single- and multifamily residential development and 5-10% for commercial and mixed-use zones. The City should consider amending all of the applicable zoning chapters to reduce minimum landscaping, perhaps in combination with heightened landscape design standards, to ensure that attractive plantings are still provided. These changes would be complementary to the changes in setbacks noted previously.

Density and Lot Size

Scenario 2 assumed a level of residential density that would not be allowed by today's KDC. The highest density for the existing zoning is 24 units per acre in MU, CM, and CO zones. This generally limits multifamily development options to garden-style apartment buildings, which is not particularly urban and may not foster the level of activity that is desired for the study area. The development scenarios included densities of up to 99 units per acre for a 5-story multifamily building. While this may be overly high, the City might consider amending the KDC to allow higher densities than it currently allows. Maximum density is also established by Keizer's Comprehensive Plan, so accommodating higher densities may also necessitate amendments to the Comprehensive Plan map, depending on the location of the desired changes. Ultimately, the maximum amount of density possible for multifamily developments is driven

more by a combination of setback, height, parking, lot coverage and landscaping requirements. As a result, density requirements are not particularly necessary or relevant for multifamily housing. Imposing density requirements also can preclude development of smaller units which may be more affordable and desirable for certain households.

The City may also consider amending minimum lot sizes to allow "skinny lot" single-family housing (e.g., homes on lots that are 25 feet by 100 feet). This development type is an alternative to zero-lot line townhomes and has been a popular approach to adding density in single-family areas in cities like Portland.

Parking

For the baseline scenario, the effective parking ratio for residential uses was typically assumed to be 1.7 spaces per unit. This is actually a bit higher than what the KDC requires, and is based on assumptions about what is marketable in Keizer, rather than what is allowed. For multifamily housing, the KDC requires a minimum parking ratio of 1.1 to 1.6 spaces per unit, depending on the number of bedrooms in each unit. This is reduced to only 1 space per unit for residential development in the CM and CO zones. The latter is in line with the Model Code, which recommends a parking ratio of 1 space per dwelling unit. Even so, where parking is accommodated with surface lots (which is typical with medium-density multifamily development and in areas where land values are not very highmoderate), it can occupy 30% to 40% of a site. In lieu of amending the parking chapter of the KDC, the City may consider allowing reduced parking ratios[WS17] within certain zones, or in certain portions of the study area. Reduce ratios also could be allowed in exchange for implementing approaches to encourage active transportation or transit uses, providing housing units affordable to lower income households, and/or providing other community benefits.

In addition to parking ratios, the City may consider location requirements, to prevent parking from being located between the building and the street. As noted in Section 3.5, locating parking to the side and rear of buildings creates less of a barrier for pedestrians and creates a more urban environment. Currently, parking to the side and rear of buildings is not required in the zones in the study area except for the CO zone.

The Impediments section of this memo also noted that the City's bicycle parking standards may be inadequate to promote riding and to create a multimodal environment in line with project goals and objectives. The City should consider increasing its minimum bicycle parking to at least 10-20% of vehicle parking (as opposed to the 5% currently required).

Building & Site Design Standards

The preceding sections discussed modifications that could be made to Keizer's existing Development Code in order to achieve the type of efficient, compact development that was modeled in Scenario 2 and that meets project goals and objectives. Beyond those measures, a number of site and building design standards should be considered that support a pedestrian-friendly environment by providing plenty of interest and activity at the sidewalk. Section 3.5 summarizes five key design standards that are key to creating an attractive and pedestrian-oriented environment: building orientation and accessibility, ground floor uses, glazing, weather protection, architectural detailing, and height. The KDC already requires the following:

- Weather protection in all zones awnings required along all storefronts abutting a sidewalk.
- Glazing in MU, CM, and CR zones minimum 50% of ground floor wall area.
- Architectural detailing in MU, CM, and CR zones variation every 30 feet, in terms of building materials, building offsets, or projections/recesses.

This is a good start toward pedestrian-oriented design, but could be supplemented with the following:

- Building and entrance orientation and accessibility Require buildings to be oriented towards the street (rather than towards parking lots) and require entrances to be directly accessible from the sidewalk (and from intersections where applicable/possible) with some exceptions WS181.
- Ground floor uses Require active uses such as retail, restaurants, and cafes on the ground floor.
- Height Require minimum building height to provide a sense of enclosure for the street. Even singlestory buildings could have a minimum height that reinforces the street wall and provides flexible ground floor spaces for tenants.
- Frontage occupancy Frontage occupancy standards could be applied in tandem with maximum setbacks to establish a minimum street frontage that is occupied by a building.
- Landscape design standards If minimum landscape coverage requirements are reduced, as discussed above, the City may choose to apply heightened landscape design standards, in order to ensure that attractive plantings are still provided.
- Opportunities for courtyards, plazas or other gathering spaces At a minimum frontage or other standards should not preclude creation of open, outdoor gathering spaces and a maximum, code requirements could require or provide incentives for such spaces and specify the types of amenities that should be included within them.

These requirements could be added to the Development Standards chapter of the KDC (Chapter 2.315), or could be added to the zoning chapters themselves.

Special Standards for Designated Centers

Some of the possible zoning code amendments discussed here may not be appropriate for entire zones. It may be preferable, for example, to allow higher-intensity development and to establish higher site and building design standards within designated "centers" along the corridor. This is in line with the project goals and objectives. Likely centers that have been established by previous efforts, like the River Road Renaissance Plan, include the intersections of River Road and Lockhaven Drive, River Road and Chemawa Road, and the confluence of River Road and Cherry Avenue.

The KDC already includes some provisions that only apply to properties near the intersection of River Road and Chemawa Road. The Commercial Mixed Use (CM) and Commercial Retail (CR) zoning chapters prohibit certain auto-oriented uses (such as gas stations and drive-through restaurants) for properties with frontage on River Road or Chemawa Road in this area. The Mixed Use chapter of the KDC also applies special standards to MU-zoned properties fronting on Cherry Avenue south of Manbrin Drive. For these properties, the minimum setback is 5 feet and the maximum setback is 10 feet, and sites are required to devote between 35-65% of floor area to residential uses.

The City could choose to use similar locational provisions to apply certain standards to properties within selected development centers. Alternatively, these standards could be applied in a zoning overlay as discussed below.

Overlay Zone

An alternative to making targeted amendments to existing zoning districts in the KDC is to establish a new overlay zone for the study area. An overlay is a zoning district that is applied over one or more previously established zoning districts, establishing additional or stricter standards and criteria for covered properties in addition to those of the underlying zoning district. Overlay zones are common approaches for implementing subarea or district plans where a set of goals and policies can be implemented across an entire area. An overlay zone could include any of the modifications to development standards discussed above; it could apply modified setback, landscaping, density, and parking requirements, as well as applying specific site and building design standards to properties within the study area. It could also modify use standards to allow additional housing types, while limiting uses that are incompatible with a pedestrian environment (such as auto-oriented uses). An overlay would allow the existing zones to remain unchanged outside of the study area, if that is what is desired.

One option to explore is establishing a tiered overlay zone, with some standards that apply across the entire study area and others that apply only to designated centers. This way, it may be possible to focus pedestrian-oriented standards to centers while allowing more flexibility for the remainder of the corridor. For example, properties within centers could be subject to stricter design standards, maximum setbacks, frontage occupancy standards, and lower parking ratios, and could be allowed to develop to a higher intensity than the rest of the corridor.

Overlay zoning may also be an effective approach to addressing the City's concerns about the width of the commercial/mixed-use zoning along the River Road/Cherry Avenue corridors, as discussed in Section 3.5. As noted in that section, there are some segments of the corridor where the commercial/mixed-use zoning is only one to two parcels deep and hemmed in by adjacent single-family zoning. An overlay zone may allow a bit more flexibility on the edges of the single-family zone. Adjusting the allowed uses and certain development standards within a limited area could create more of a transition to the higher-intensity commercial corridor and allow additional development along its edges.

It should also be noted that an overlay zone would be a natural means for applying elements of form-based or performance-based code to the study area.

Rezoning

In the scenario modeling, Scenario 3 went beyond Scenario 2 by not only implementing various efficiency measures, but also by upzoning strategic parcels to allow greater development intensity. Upzoning included allowing townhomes or an additional housing unit on single-family sites; rezoning some single-family properties near arterials and collectors to allow multi-story multifamily buildings; rezoning a number of RM properties for mixed-use development; and converting some industrial properties to mixed-use. The changes made in Scenario 3 resulted in a significant increase in the amount of housing—2,469 units, compared to 1,705 units in Scenario 2.

In order to see the growth modeled in Scenario 3, properties would need to be rezoned. It may be possible to achieve this through an overlay zone, as discussed above, but it may also be achieved through strategic rezoning of properties within the study area. The likely approach would be to upzone properties by one tier—for example, RS to RM and RM to MU. Areas targeted for potential rezoning would be around designated centers and could include some of the single-family properties bordering the commercial/mixed-use zones.

Development Requirement Flexibility

Design Standards and Guidelines

In order to achieve aesthetics desired in the study area, building design standards specific to the study area may be incorporated into the implementation options discussed in the previous subsections (e.g., modifying existing zones and creating a new overlay zone). In order to also provide for flexibility in how design goals are met, there is the option to create a discretionary set of design guidelines. Developing and administering the guidelines may involve significant staff time and capacity and may elevate the application procedure type. However, the flexibility can be highly valuable to developers and attract more development. Use of design guidelines would have to be optional for residential uses, given state requirements for clear and objective standards for such uses. For those uses, use of design guidelines would represent a "two-track" approach.

Adjustment Procedures

An alternative to creating a distinct set of design guidelines for the Keizer Revitalization Plan study area is to allow for more development requirement flexibility through an adjustment procedure. The City has variance procedures, which tend to set a high bar in requiring that "hardship" be demonstrated; the City does not have adjustment procedures. Adjustment procedures are intended for smaller modifications of numerical development standards and may allow for modification of a broader set of development

standards, not just numerical ones. An adjustment procedure would be a new procedure, ideally an administrative Type I procedure so as not to be seen by developers as onerous.

Assessment of Zoning Approaches

Each of the approaches discussed here—amending existing zones, overlay zoning, and rezoning—has its own advantages and disadvantages. Each has the potential to implement the goals and objectives of the project to some degree, though overlay zoning and rezoning offer greater potential for adding development capacity, as modeled in Scenario 3. Overlay zones have the advantage of tailoring regulations to a specific area to meet specific community goals. In terms of legality in Oregon, each of these approaches has been established as feasible and legally defensible, with countless precedent examples. However, care must be taken with overlay zoning and rezoning so as not to violate the "uniformity clause" of the Standard State Zoning Enabling Act by ensuring that all similar properties are treated similarly.6

In terms of challenges to adoption, rezoning would likely face the steepest challenges to community and political acceptance. Because of the targeted nature of potential rezoning, it would affect some property owners in the study area and not others. While some owners may cheer the increased development potential of their sites, any upzoning of single-family areas is likely to be controversial. Any constraints imposed by heightened design standards is also likely to face opposition. As a result, the public process for rezoning may be lengthier and costlier than for the other options.

Regarding administrative costs for the development approval process, overlay zoning can create inefficiencies by applying regulations and restrictions to some properties and not others. It can also increase time and expense both for developers and for the City, as they will be required to review multiple sets of standards and determine which apply to a given property.

From the market perspective, the private sector is not flocking to Keizer to build new apartments/condos or office buildings. The types of development shown the Baseline Scenario are buildable within Keizer today and near-term years. The second scenario relied on opening up some regulatory barriers to make some types of development more feasible. However, the higher level of growth, exceeding the forecasted demand for the area, is reliant on enhancing place to attract people looking for the special and rare small "urban" city. It is still of question if the market can absorb the full number of units projected in any of the scenarios. Again, doing so relies on increasing the desirability of the urban portions of Keizer to where they attract people that might otherwise be looking elsewhere. [WS19]

Keizer Revitalization Plan Draft Memorandum #4: Gap Analysis Otak | Angelo Planning Group | Johnson Economics | Kittelson & Associates

⁶ https://www.planning.org/divisions/planningandlaw/propertytopics.htm

5. Investments in Public Facilities and Services

This gap analysis has identified a number of barriers to development. It has suggested ways in which policies or regulations could be altered to both remove barriers and ideally incentivize the right kind of growth in the right places. As the process moves forward, the next steps include identifying proactive ways in which the City can encourage the private sector investments that will be required to build the desired future. Keizer's leaders will need to determine how much to spend in support of these outcomes, and then on the value of the investments themselves.

Growth within the study area, as it is heavily reliant on redevelopment of lands in close proximity to existing infrastructure, requires much less investment in such public infrastructure than similar amounts of growth in areas whose land supply is predominately vacant. Public investments in sewer and water are sometimes used for new growth areas. No such investments have been identified for this area.

There are several avenues where public investment in urban areas such as this can prove valuable. A few notable options include:

Placemaking

Ultimately it will be the desirability of Keizer's core that brings people and the investment to town. As areas become more urban, the aesthetic of place becomes more important. Examples from semi-recent urban renewal projects demonstrate how changes to a streetscape can improve the look and feel of an area. The highly successful investments aim to enhance and sometimes expand the public realm.

- Streetscape designs that fosters walking and outdoor dining attracts people and sends a message to the development community that the City is open for business.
- Plazas or other public gathering spaces not only look good, but they serve as valuable open space and expand the range of park spaces to include urban hardscape that is often a key supporter of development.
- Civic buildings such as Keizer's civic center communicate much about a city. Are other city buildings needed? Are there candidate locations along River Road where a beautiful and functional building could help define a space?

Transportation

- Conventional investments in auto and bus travel are identified in the TSP. Their goal is predominantly to facilitate safe and efficient movement. Enhanced design of these facilities, be it artful walls or paving treatments, or pleasing landscape elements can turn a functional design into a special enhancement. Consider for example the Woodburn overpass along I-5. Purposeful landscaping, artful design and colored lighting turn an ordinary concrete structure into a gateway.
- Multi-modal opportunities abound. Vibrant commercial areas allow people to park their car once, if they brought it at all, and fulfill the rest of their needs on foot, bike or transit. Sometimes these are called park once districts. Common features include prominent non-auto circulation facilities (sidewalks, pathways, re-designed intersections, wayfinding, transit stations, and creating new roadways in order to remove multiple curb cuts as described in the TSP.
- New technology is playing a larger role in urban placemaking. Many of the investments in new technologies are investments in staff time rather than physical property. More and more cities are using car and bike share and e-scooters to solve some of the transportation gaps. A person in Keizer may have great access to work via the bus. Bikeshare, e-scooter a short-term car rental may be all that is needed for them to live car free, saving thousands per year that they can use for other, more important things.

Parking

Parking is the life and death of business districts; too much and they suffer, too little and they cannot attract investors. New technologies and a shift to online shopping are starting to erode the need for parking. However, parking will not disappear tomorrow. Civic investments in parking facilities are one of the ways to enable more efficient land development and improve a streetscape. If for example, a city lot

one-block behind a main street were available for parking, businesses could build out their full frontage of River Road or Cherry Avenue, enhancing the public's experience while also putting their taxable land to better use.

Development Partnerships

Development Partnerships are instrumental in spurring along development projects in a soft market. Developers and their bankers rarely want to be the first one to the party. They are much more interested in developing in a new style, such as mixed use, and in an area that is new to them when they see that others are profiting from similar projects. One of the best ways to partner with developers is to buy land. If a city owns land, it can subsidize development without taking large risks, or expensing significant capital. These partnership projects often act as catalysts spurring on other projects in the area.

Economic Development

Economic Development departments are common among medium size and larger cities. Dedicated professionals spend their time working with the larger business community, recruiting investors in the City. Some cities choose to hire out these services as well.

As this project moves forward we look to the Advisory Committee, Planning Commission and City Council to help us identify the places they would like to see public investment.

Keizer Revitalization Plan

6. Implementation Steps

6.1 Potential Code Amendments

The implementation steps necessary to complete the potential code amendments discussed in the previous section would depend on which zoning approaches are selected. However, we can assume that any amendments would include the following steps:

- 1. Determine scope and or phasing of amendments. This may include:
 - a. Code amendments amend existing KDC chapters and/or creating new chapter(s)
 - b. Comprehensive Plan amendments map and/or text amendments
- 2. Create a public involvement strategy
 - a. CAC, public meetings, events, and communications
- 3. Develop draft Comprehensive Plan map and/or text amendments
- 4. Develop draft amendments to KDC
 - a. This will require preparation of a new code section, with review by staff, the Planning Commission, Council and possibly other stakeholders or community members. The amount of time to complete this effort will depend in large part on the scope of the proposal and the level of public involvement.
- 5. Initial Public Involvement
 - a. Early communication with affected neighborhoods will determine the amount of public outreach needed.
- 6. Revise draft KDC and/or Comprehensive Plan amendments
- 7. Additional Public Involvement
- 8. Adoption by Planning Commission and City Council

6.2 Potential Investments

Following identification of specific programs, capital projects, catalytic projects and investments they must be assessed for expected level of effort, costs, and likely results then sorted by priority and feasibility. One approach we suggest is to develop a flexible plan that is proactive as needed, yet responsive and therefore adaptable to changing conditions and circumstances. The draft project list is proposed to be organized into categories.

"Do Now" Leading catalytic projects

Are infrastructure and open space projects that are necessary to catalyze and support new development along and adjacent to our arterial street fronts. These can include new programs such as the establishment of an economic development team, policy and zoning code changes, or a specific property acquisition. Some may be landmark, such as a recreation center or new plaza while others, such as livable street upgrade could be district-wide. These project would be limited to within the project study area.

"Do When" Community infrastructure projects

These are improvements to an entire system that benefit all residents and employees in the area and those who come to visit. These will follow the catalytic projects and continue throughout implementation. Examples could include new transportation or infrastructure investments such as those programed in the TSP or additions of public open space as funds become available. These projects can extend beyond Keizer's core, recognizing that large systems such as transportation or stormwater have both local and citywide effects.

"Do If" Co-investment projects

Projects directly tied to redevelopment on private properties. These projects are contingent upon partnerships with willing property owners and developers to move forward, usually through negotiated

development agreements. Many cities use tax increment financing for these which is not currently available in Keizer. These types of projects would likely be limited to either directly along River Road or Cherry Ave.