



Bureau of Planning and Sustainability

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MEMO

DATE: May 1, 2015

TO: Planning and Sustainability Commission

FROM: Eric Engstrom, Principal Planner
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CC: Susan Anderson, Director

SUBJECT: Comprehensive Plan Update – Economic Development Policy Issues

In a follow-up to the February 10 work session on Chapter 6 – Economic Development, the following issues were identified for further discussion:

1. Industrial Lands Retention Policy
2. Economic Opportunities Analysis
3. West Hayden Island Policy and Process Options
4. Goal 9 Exception
5. East Columbia NA Request
6. Accuracy of Employment Forecasts
7. Employment to Open Space Map Changes
8. Campus Institution Zoning Project



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1. Industrial Lands Retention Policy

At the February 10 work session there was some confusion about the proposed prime industrial land retention policies. Here is the current version of the key policy:

Policy 6.38 Prime industrial land retention. Protect the multimodal freight-hub industrial districts at the Portland Harbor, Columbia Corridor, and Brooklyn Yard as prime industrial land (see Figure 6-1) that is prioritized for long-term retention:

6.38.a. Prohibit quasi-judicial Comprehensive Plan Map amendments that convert prime industrial land and consider the potential for amendments to otherwise diminish the economic competitiveness or viability of prime industrial land.

6.38.b. Limit conversion of prime industrial land through land use plans, regulations, or public land acquisition for non-industrial uses, especially land that can be used by river-dependent and river-related industrial uses.

6.38.c. Identify how regulations affect the capacity, affordability, and viability of industrial uses, and limit those impacts.

6.38.d. Strive to offset the reduction of development capacity as needed, with additional prime industrial capacity that includes consideration of comparable site characteristics. Offsets may include but are not limited to additional brownfield remediation, industrial use intensification, strategic investments, and other innovative tools and partnerships that increase industrial utilization of industrial land.

6.38.e. Limit the use of prime industrial land for siting of parks, schools, large-format places of assembly, and large-format retail sales.

6.38.f. Promote efficient use of freight hub infrastructure and prime industrial land by limiting non-industrial uses that do not need to be located in the prime industrial area.

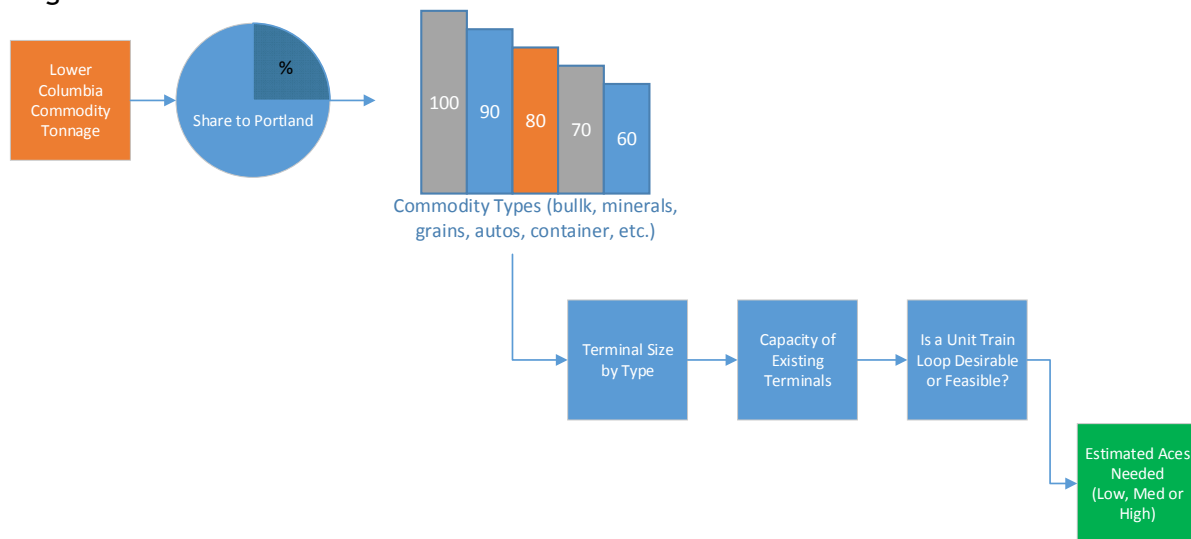
The following proposed actions will implement these policies:

- Amend zoning regulations to prohibit quasi-judicial map amendments from Industrial Sanctuary to another designation on Prime Industrial land.
- Amend zoning regulations to reduce allowance for non-industrial uses in industrial zones.
- Develop inter-governmental coordination procedures for proposed public acquisitions to track and mitigate impacts on industrial land supply.

2. Economic Opportunity Analysis (EOA) - Marine Cargo Forecasts

The marine cargo forecast is expressed in terms of low, medium, and high scenarios. The forecast is constructed from a series of other estimates that each have some uncertainty.

As with the jobs forecast, there are a number of steps and assumptions that convert the commodity flow forecast into a land demand. The ECONorthwest *Portland Harbor Industrial Land Supply Report* (2012) explains the complexity and variables that go into the overall cargo forecasts



1. The land need forecast starts with a forecast for the tonnage of commodities that will move through the Lower Columbia River ports.
2. Portland's share is then estimated based on historical data and trends.
3. The Portland share is allocated to different commodity types, because different commodities will have different marine terminal land need characteristics.
4. The unutilized capacity of existing terminal facilities of different types and the need for additional terminal facilities are estimated. The estimate of the range of anticipated terminal sizes is based on case studies of terminal design characteristics found in modern terminals throughout the world.
5. Finally, the estimates of the acreage needed for these terminal facilities were prepared for the low, medium, and high land need scenarios based on policy and facility design considerations.

It may be possible to accommodate facilities on a smaller footprint if a lesser level of rail efficiency is accepted. In a market economy, that may create a competitive disadvantage for Portland, unless the disadvantage can be overcome with public subsidy. Or, as the capacity of existing marine terminals changes, some demand can be absorbed by that capacity. The mix of commodities is very difficult to predict accurately over the long run. The recent surge

in energy related exports is an example of the uncertainty of forecasting the mix of commodity needs.

2040 Portland Marine Terminal Cargo Volume Forecast (metric tons)

Cargo Type	Estimated Capacity Existing Terminals	2040 Cargo Volume (public and private terminals)		
		Low	Medium	High
Automobiles	889,000	1,076,000	1,206,000	1,336,000
Containers	3,999,000	2,162,000	2,583,500	3,005,000
Breakbulk	2,350,000	1,132,000	1,242,000	1,352,000
Grain	7,100,000	6,686,000	9,078,000	11,470,000
Dry Bulk	12,200,000	10,278,000	14,093,500	17,909,000
Liquid Bulk	8,280,000	6,912,000	7,461,500	8,011,000
TOTAL	34,568,000	28,246,000	35,664,500	43,083,000

Source: Estimates of capacity are from Port of Portland, reported in West Hayden Island Economic Foundation Study (Entrix, 2010), and confirmed through interviews with Port of Portland officials.

Source: Low and High forecasts were made by BST Associates for the *Portland and Vancouver Harbor Forecast Update (2012)*.

*Medium scenario is calculated by ECONorthwest as the average of the BST low and high scenarios.

For context, in 2014 the Port of Portland moved almost 13 million tons of cargo. Over the last 15 years, the Port has experienced about 3% annual growth of commodity movement, measured in metric tons. Grain and Dry Bulks have grown at about 2% annually, while auto shipments have been relatively flat. The low scenario forecast is more than double 2014 levels by the year 2040, with an average annual growth rate of 1.5% per year.

The ECONorthwest analysis varied its assumptions to create a full range of land need estimate scenarios.

The lowest shortfall scenario assumes:

- the low demand forecast,
- that existing facilities would be able to operate at 100% efficiency, and
- that private terminals will be able to continue accommodating cargo at their recent peak levels.

The highest shortfall scenario assumes:

- the high demand forecast,
- that existing facilities would continue operating at their historical peak levels, and
- that all additional demand coming from new market opportunities that require new terminals.

The most-likely scenario assumed:

- the medium demand scenario (calculated as the average of the low and high scenario), and
- That existing facilities operate at 90% of capacity.

2040 Potential Portland Marine Terminal Capacity Shortfalls

Cargo Type <i>Metric Tons</i>	2040 Forecasted Cargo Volume (public and private terminals)		
	Low	Most Likely	High
Automobiles	(187,000)	(410,000)	(730,000)
Containers	-	-	(1,120,000)
Breakbulk	-	-	-
Grain	-	(2,390,000)	(4,370,000)
Dry Bulk	-	(2,960,000)	(10,949,000)
Liquid Bulk	-	-	-
TOTAL	(187,000)	(5,760,000)	(17,169,000)

Source: Estimates of capacity are from Port of Portland, reported in West Hayden Island Economic Foundation

The potential capacity shortfall ranges from less than 200,000 metric tons in the low shortfall scenario to more than 17 million metric tons in the high scenario. The most likely scenario shows a potential shortfall of 5,760,000 metric tons, with all of the shortfall occurring in dry bulk, grain, and automobiles.

Translating cargo volumes into acres for port terminals is challenging, and depends on a host of variables. This analysis is based on industry standards for the size of marine terminals for various cargo types based on three supporting studies.¹

The minimum land scenario uses assumptions based on throughput (tons per acre of terminal land) from case study ports in North America and Europe - most of which are not modern, recently constructed facilities. The “practical” land need is based on an average values for modern, recently constructed facilities. The final column shows the land need if a dedicated rail loop is included with the terminals that would require rail access.

Rail loops allow for a higher commodity throughput per acre because the commodity can be directly delivered to the terminal and timed to arrive to meet the ship. Without a rail loop, trains must be broken up and shuttled back and forth in segments to avoid blocking the mainline. The additional back and forth movement generates additional pollution, and means that materials must be stored longer at the terminal, which reduces throughput.

The results of this analysis, using the mid-range scenario, show at least 170 acres of land needed if facilities are designed with minimal footprints, and up to 470 acres if more optimal rail access is included. An optimal rail loop occupies about 300 acres, due to geometry of tracks, but several terminals can potentially be served from it.

¹ The West Hayden Island Economic Foundation Study (Entrix, 2010), the Draft Report on Operational Efficiencies of Port/Terminal World Wide (Worley Parsons, 2012), and the Maul Foster and Alongi evaluation criteria (2012).

2040 Marine Terminal Land Need for Medium Cargo Forecast

Cargo Type <i>Metric Tons</i>	Capacity Shortfall	Acres Needed		
		Minimum	Practical	w / rail
Automobiles	(410,000)	120	270	270
Containers	-			
Breakbulk	-			
Grain	(2,390,000)	30	50	100
Dry Bulk	(2,960,000)	20	70	100
Liquid Bulk	-			
TOTAL	(5,760,000)	170	390	470

Source: Calculated by ECONorthwest

Note: This table estimates acreage needed, not the number of terminals needed. Terminal size can range from 150 to 200 acres for automobiles and containers, to as small as 5 acres for liquid bulk. Depending on terminal size assumptions, the acreage need for automobile cargo could be accommodated by anywhere from one to five terminals in the City of Portland.

The marine terminal land need is dependent on two major factors that incorporate the many variables regarding volumes, commodity mix, and terminal needs. There are three basic options - each with a slightly different impact on the Harbor Access Lands capacity shortfall. The 2015 EOA is based on a low cargo volume with modern terminal facilities. The 2012 EOA was based on the medium cargo forecast with modern facilities and a rail loop. An alternative would be a medium cargo forecast with compact terminal designs and reliance on expansion of existing terminals rather than new terminals. There is an adequate factual basis in the background reports to support selecting any of these options. However, the larger the shortfall, the more difficult it will be to demonstrate there is adequate supply of land to meet future industrial employment demand.

Cargo Volume Forecast	Terminal Land Need	Harbor Access Land Shortfall
Low	Modern	-38 acres
Medium	Compact/Minimal Footprint	-48 acres
Medium	Modern w/rail loop	-268 acres

3. West Hayden Island tentative PSC recommendation

The proposal discussed and tentatively endorsed by the PSC on February 10th was:

- Retain the site's Comp Plan map designation as Rural Farm Forest²
- Adopt Policy 6.41, described below, as guidance for future potential annexation

BPS staff recommended the policy to be clear that the proposed designation for the site is consistent with Metro's industrial designation. Policy 6.41 is intended to govern consideration of any future marine terminal development proposal at West Hayden Island including the need to mitigate adverse that development of West Hayden Island environmental and community impacts.

Policy 6.41 West Hayden Island. Provide for the future annexation of West Hayden Island for a combination of open space and deep water marine industrial uses with supplemental requirements in a plan district or other implementation agreement that ensures mitigation of impacts and provision of public benefits. The annexation ordinance, future zoning, plan districts, and intergovernmental agreements will be used to:

- Allow no more than 300 acres for future deep water marine terminal and infrastructure development, with operationally viable rail access.
- Permanently protect and enhance at least 500 acres as open space, to be managed primarily for the benefit of the regional ecosystem.
- Address local quality of life and public health impacts (especially for residents of the nearby manufactured home community), traffic impacts and needed transportation investments, and opportunities for low impact nature based recreational uses.
- Achieve a net increase in ecosystem function over 2012 conditions, including floodplain, bottomland hardwood forests, wetlands, grasslands, sandy beach and shallow water. (amended as directed by PSC)

Policy Options in response to questions raised by the PSC:

While the PSC tentatively endorsed the approach to retain the Farm/Forest map designation with the policy quoted above, the PSC asked that staff prepare the following additional alternatives of Commission consideration:

1. Retain the Farm/Forest map designation, and DELETE draft Policy 6.41.

This option retains the current land use status of West Hayden Island. While being open to change in the future, it implies that the current use of West Hayden Island will likely continue for the 20-year of the new Comprehensive Plan.

² Existing Multnomah County zoning would be retained, including the sec overlay.

2. Retain the Farm/Forest map designation, and further amend the policy to add more detail to the third point about community impacts to be addressed as identified in the PSC annexation recommendation.
 - a. Address local quality of life and public health impacts (especially for residents of Hayden Island), including impacts on the transportation system, noise, light, and air pollution.

This option adds language to draft Policy 6.41 that makes clear that consideration and mitigation of impacts from potential development of West Hayden Island should include public health impacts on residents.

3. Retain the Farm/Forest map designation, and amend policy to delete bullets that reference 300/500 acre split.
4. Change the map to designate WHI as open space and delete the policy. .

Options #1 and #4 may represent a potential departure from adopted regional plans. In either of those scenarios, the Comprehensive Plan may need to be accompanied by a request to Metro that they amend the Urban Growth Management Functional Plan and the Title 4 map to remove the Regionally Significant Industrial Area designation. These changes could trigger a reconsideration of the regional employment land capacity and could result in the need for an expansion of the UGB. Changes to Metro Title 13 may also be required.

Metro Policy Background

Metro area cities and counties are required to comply with the Urban Growth Management Functional Plan (UGMFP) when updating comprehensive plans and land use ordinances. In 1983 the regional government (pre-cursor to Metro) expanded the Urban Growth Boundary to include West Hayden Island to provide a future site for waterfront industrial and marine terminal uses. In conjunction with the Urban Growth Boundary expansion, Multnomah County re-designated West Hayden Island from “Multiple Use Forestry” to “Future Urban” within the Multnomah County Framework Plan.

Metro Title 4 seeks to provide and protect a supply of employment land by limiting the types and scale of non-industrial uses in Regionally Significant Industrial Areas (RSIAs). RSIAs are located near the region’s most significant transportation facilities for the movement of freight and other areas most suitable for movement and storage of goods. WHI and the surrounding industrial and employment lands are RSIAs.

Metro Title 13 establishes the Nature in Neighborhoods program to protect, conserve and restore significant riparian corridors and wildlife habitat. Metro’s regional inventory designated WHI Habitat of Concern and a Class I Riparian/Wildlife Area. Metro’s ESEE decision was to limit conflicting uses at WHI and Metro designated WHI a Moderate Habitat Conservation Area. Metro describes that a decision to limit conflicting uses “strikes a balance between completely developing the Goal 5 riparian and upland wildlife resources and protecting them.” Limiting conflicting uses in this way provides opportunities to develop lands in ways that minimize negative environmental and economic tradeoffs. Title 13 requires that the City of Portland develop a District Plan for West Hayden Island, in cooperation with the Port of Portland.

The staff-proposed policy and the Farm Forest map designation work in combination to align City plans with Metro policies regarding WHI. The Farm/Forest designation signals that the City does not expect marine terminal development within the next 20 years. The Farm/Forest Comp Plan designation matches the existing County zoning, which allows agriculture, and low density residential uses. Policy 6.41 provides additional direction for a district plan as part of a future comprehensive plan amendment and annexation process, if such a process were to occur within the next 20 years.

Deleting the WHI policy or changing the map designation to Open Space may require corresponding changes to Metro's RSIA designation, and Metro Title 13.

The process for that review would be:

- 1) The City would send the adopted Comprehensive Plan to Metro for compliance review.
- 2) The transmittal could include a request from the Mayor to amend the UGMFP Title 4 and 13 text to remove references to WHI as a future industrial site and to change the Title 4 map to remove the RSIA designation. The Metro Council would be the decision-maker in such a request.
- 3) Metro Council approval of a change in the regional designation would be a land use decision, subject to its own appeal process.
- 4) If the Metro Council declined to change the regional designation, or if the City does not ask for the change, then Metro would review the City's Comprehensive Plan against the current UGMFP. If they found that it did not conform, they could remand the Comp Plan back to the City for further work.
- 5) Independent of Metro's findings, the plan must be acknowledged by LCDC before it goes into effect. LCDC will weigh evidence in the record to determine the City's compliance with state goals. One of the state goals (Goal 2) requires consistency between city and regional plans. Due to the outstanding Metro consistency issues, the Metro Council may need to make a decision before the state acknowledgement review could proceed. Waiting for Metro to complete their process could delay the state acknowledgement process by 6-12 months.
- 6) The Multnomah County Board of Commissioners also must adopt the City's Comprehensive Plan before the Comp Plan goes into effect in the unincorporated urban areas within Portland's Urban Services Boundary³.

4. Goal 9 Exception Option

³ The Comprehensive Plan is a planning document that governs growth management within all areas of Portland's Urban Services Boundary (USB). The USB is the boundary of all areas within the Urban Growth Boundary (UGB) that may eventually be part of the City of Portland. The City boundary is within the USB. Areas within the USB but outside the current city boundary are eligible for annexation under regional and state planning laws. The City currently provides planning and zoning services to these areas on behalf of the County.

On April 28 several commissioners asked for an explanation of the State Goal Exception process. Not meeting an employment land need identified in the EOA will require an exception to Statewide Planning Goal 9. Most exceptions are for meeting housing or employment needs on agricultural land; the reasons being that the identified needs cannot be met on non-resource land. In this case, the City of Portland would be proposing the opposite, that the need for the natural resource conservation or recreation outweighs employment needs.

Exceptions to Goal 9 are allowed, but are site specific. Rules and criteria are found in ORS 197.732. The City would have to show that:

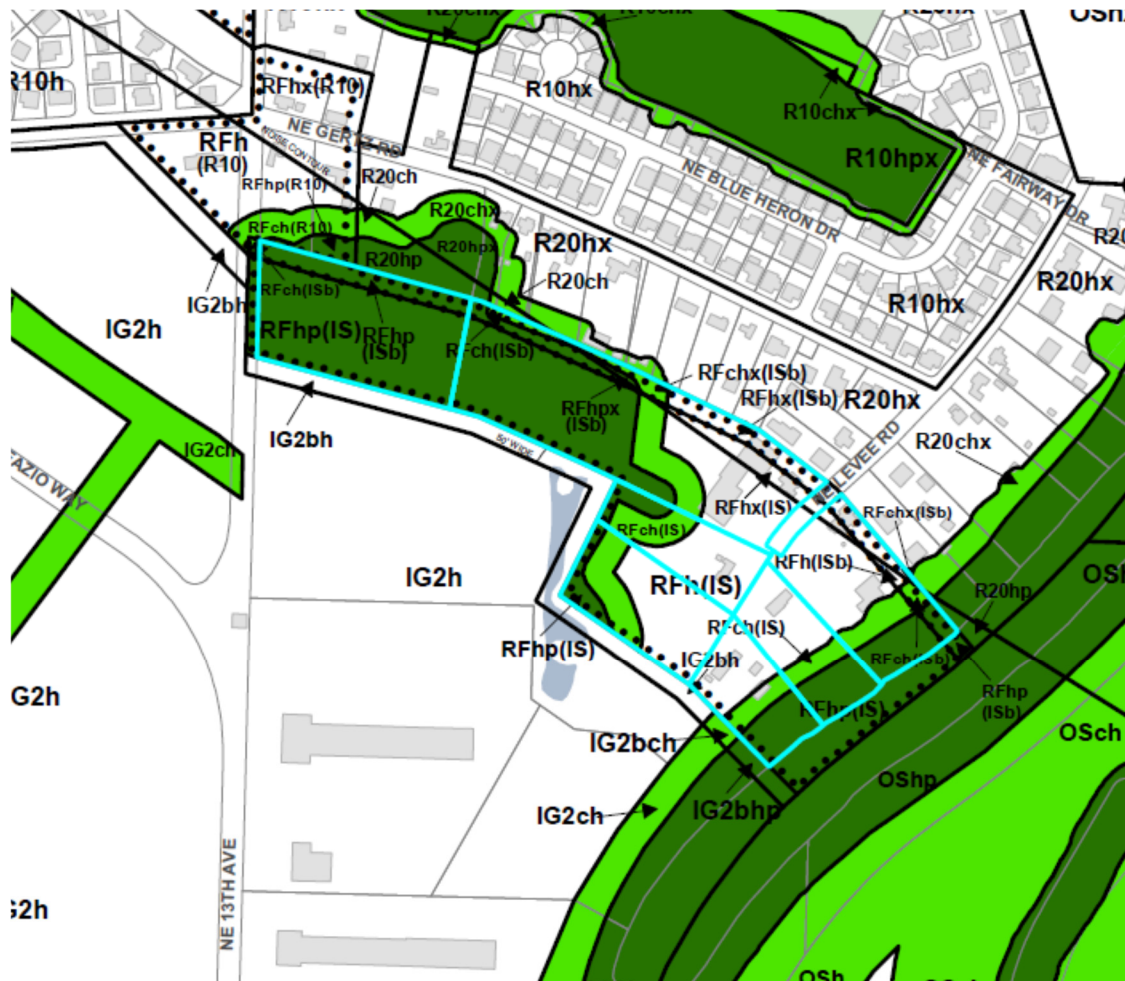
- The land subject to the exception is physically developed to the extent that it is no longer available for uses allowed by the applicable goal; or
- The land subject to the exception is irrevocably committed to other uses, or adjacent uses and other factors make uses allowed by the applicable goal impracticable.

Analysis would be required to justify why the state policy should not apply, including consideration of the long term environmental, economic, social and energy consequences.

For example, an exception to not meet the identified need for marine terminals would need to explain the reasons as to why West Hayden Island cannot be designated for marine industrial use at this time. Several exemptions might be required for different places that are otherwise suitable to meet the identified to meet the marine terminal (or general industrial land need). There are no specific rules that allow the City to take a general “policy exception” to Goal 9 to not meet part of employment land needs, or to just not submit an EOA.

5. East Columbia NA Map Change Request

At the April 28 public hearing, representatives from the East Columbia Neighborhood Association presented a map designation change request. The request concerns seven parcels at the end of NE Levee Road that are designated Industrial Sanctuary (IS) and currently zoned RF. The property owners and neighbors have requested a Comprehensive Plan Map change from industrial to residential with R20 zoning. The parcels represent about 20 acres of potential industrial capacity.



BPS staff has not supported this request for three reasons:

1. More stringent retention of existing industrial land in Prime Industrial Areas is one of the main strategies proposed to meet the overall shortfall of industrial land capacity. The requested map change would be inconsistent with this industrial retention strategy. Reuse of the site would potentially accommodate 7-8 acres of industrial development, consistent with existing environmental zoning.
2. The existing IS Industrial Sanctuary and previous Manufacturing designation on this 20-acre area has been in place since the 1980 comp plan. The land use direction for these industrial areas since the 1950s has prohibited new residential development, and

existing residential uses are expected to eventually redevelop for employment use. Reasons cited for this land direction in the 1987 comp plan update were to prevent a health danger to residents and preserve land for industrial expansion. The requested map change to R20 would accommodate residential expansion up to 2.2 units per acre on developable portions of the site, allowing up to 40 additional units compared to 5 existing houses. Adding residential zoning here would place new housing units in close proximity to existing industrial uses.

3. The zone change process required to develop industrial uses will provide the opportunity to address concerns about truck access, or on-site infrastructure. Site access can potentially be provided from the south or west, rather than along Levee Road through residential zones.

Testimony from the East Columbia Neighborhood and the Northeast Collation of Neighborhoods related to air quality will be addressed in a separate memo at a later date.

6. Accuracy of Employment Forecasts

During the February work session the PSC asked about the accuracy of past employment forecasts. Metro prepares the population and employment forecasts for the region, then allocates the forecasted growth to individual jurisdictions. Metro relies on computer generated forecasts to help foresee growth trends (and ranges) in employment and population of the region. The model is a statistical, regression-based economic representation of the regional economy. This economic model is integrated with a traditional cohort-component population model. The econometric portion of the model predicts regional employment and wage trends while the cohort model predicts regional population growth.

Employment (and economic) forecasts are generally less accurate than population forecasts because the models are only able to consider part of the economic picture. There is a much higher degree of uncertainty in the variables used to predict regional employment. Besides more uncertainty in the input variables, the economic relationship between the regional economy and national/global economy is also subject to wider economic shifts. In other words, past performance is no guarantee of future results.

There are two vintage Metro forecasts (1985 and 2000) forecasts that are old enough that they can be used for comparison. The 1985 regional forecast showed a forecast error in employment of -3.3 percent by the end of its 20 year forecast horizon in 2005. This forecast was remarkably accurate despite the economic turmoil (positive and negative) that played out during the 20 year time frame. Also, in terms of business cycle comparisons, both 1985 and 2005 are roughly at the same stage of the business cycle - i.e., both are trending up and somewhere in the middle of the peak and trough of their respective recessions. For trend analysis point of view, this is a fair comparison.

The 2000 regional forecast shows a very wide error margin in employment of 22.1% (or a difference of 211,688 jobs by 2010). The mitigating reason for this wide margin is the Great Recession. In terms of trend comparison purposes, this is the worst comparison to make because the 2000 base year was a peak business cycle year while 2010 is trough business cycle year. Without the recession (or comparing peak to peak in the trend) the regional economy would have yielded about 200,000 more jobs on a trend basis, but the unforeseen Great Recession caused instead a loss of 70,000 annual jobs (2008-10).

7. Employment to Open Space Map Changes

The PSC also asked for more explanation of land that has been changed from industrial to open space on the Proposed Comprehensive Plan map. This primarily involves parcels that have been acquired by public agencies for natural resource or open space functions. By their nature, these parcels have high resource values and low or no employment capacity due to existing physical constraints such as floodplains, wetlands, and riparian areas.

BPS has proposed to change the map designation from employment (industrial or mixed employment) to open space to reflect the purpose and function of these parcels. These changes involve 50 parcels and nearly 900 acres of gross site area. Most of these parcels are not included in the Buildable Land Inventory (BLI) due to a variety of natural resource and service constraints. There is only 36 acres of employment land capacity, with only three parcels having more than one acre of such capacity. The largest change in employment capacity (24 acres) is associated with Thomas Cully Park.

Public Agency Ownership

City of Portland Bureau of Parks and Recreation	20 parcels
Metro	12 parcels
Port of Portland	10 parcels
City of Portland Bureau of Environmental Services	8 parcels

Parcel Sizes

0-5 acres	5-15 acres	15+ acres
32 parcels	6 parcels	12 parcels

8. Campus Institution Zoning Code Change

Healthcare and higher education employment sectors are expected to be significant engines of economic activity and job creation over the next 20 years. Despite their importance, there is a shortage of available development capacity to accommodate the projected growth of these campus institutions. Additionally, the “conditional use master plan” (CUMP) and “impact mitigation plan” (IMP) land use reviews currently required to obtain development approval are considered cumbersome and expensive. They also can generate conflict between an institution and its adjoining neighborhoods.

The Comp Plan addresses the development capacity shortfall for Campus Institutions (hospitals and colleges) with a set of policies focused on campus institutions; designating the existing approved campus boundaries as “Institutional Campus” on the Comp Plan Map; and creating two new base zones (CI1-Urban Campus and CI-2 Residential Campus) with a set of allowed uses and development standards tailored to characteristics of these institutions.

BPS has worked with advisory group over the past 12 months to create the new base zones. A Draft Concept Report that describes the proposal in greater detail has been published and BPS staff is meeting with institutions and surrounding neighborhood and business associations to discuss the concepts and we draft the specific zoning code text.

In addition to providing development capacity for the institutions to grow, other project goals include:

- Permanence: Entitlements and restrictions applied to an institution should be permanent, not subject to the 10-year expiration now applicable to CUMPs and often to IMPs.
- Focused development on existing campuses: Encourage development within existing campus boundaries rather than spread out into the surrounding neighborhoods.
- Compatible campus edge: Land use and building design at the edge of institutional campuses have greater potential impact on the adjoining neighborhood than what occurs in the interior. Require adequate buffers between an institution and adjoining residential uses as well as institutional participation in development of adjoining neighborhood business districts.
- Minimize offsite impacts: The most common neighborhood concerns involve offsite impacts, including (but not limited to) traffic and parking. A successful zoning update project will continue to provide neighborhood input into transportation issues and opportunities to assess, avoid or mitigate offsite impacts.
- Ease of administration: Create a zoning structure that is easy to understand by applicants and interested participants. It should also be straightforward for City staff to administer.

After a review of existing campus typology and location factors – such as the presence of commercial zoning in the neighborhood and public transportation options as well as relationship to “centers and corridors” – two new campus institution base zones are proposed:

CI-1: Urban Campus: CI-1 zoning will apply to medical centers and college campuses located along civic and/or neighborhood corridors, accessible by frequent service public transit and adjacent to, or within “Regional, Town or Neighborhood Centers.” This zone is designed to accommodate building height and floor area ratios supportive of modern medical facilities, educational campuses and accessory commercial activity in an urban environment. Use and development standards acknowledge that such institutions may be adjacent to and contribute towards commercial corridors as well as residential neighborhoods.

CI-2: Residential Campus: CI-2 zoning is intended for academic institutions with campuses larger than 10 acres in size located in neighborhoods that are otherwise predominantly residential in character. Due to the larger size and generous open space of these campuses, a lower floor area ratio supports traditional academic site planning and architecture. These campuses are typically not located in or adjacent to designated Town or Neighborhood Centers. Access to frequent service public transit may be limited.

This zoning code project is part of Task 5 of Periodic Review and is scheduled for PSC review in October.