



Minutes of the Molalla City Council Meeting

Molalla Civic Center
315 Kennel Ave., Molalla, OR 97038
February 8, 2023

CALL TO ORDER

The Molalla City Council Meeting of February 8, 2023 was called to order by Mayor Scott Keyser at 7:15pm.

COUNCIL ATTENDANCE

Present: Mayor Scott Keyser, Council President Jody Newland, Councilor Terry Shankle, Councilor Crystal Robles, Councilor Eric Vermillion, and Councilor Rae Lynn Botsford.

Absent: Councilor Leota Childress.

STAFF IN ATTENDANCE

Christie Teets, City Recorder; Dan Zinder, Senior Planner.

Guest Presenter: Jennifer Arnold, Emerio Designs.

APPROVAL OF THE AGENDA

Mayor Keyser asked City Council and Staff if there were any changes to the agenda. Council President Newland stated that new information had been brought to Council regarding Item 8C, and that she would like it removed from the agenda. Consensus by Council removed the item.

CONSENT AGENDA

- A. Work Session Meeting Minutes – January 11, 2023
- B. Goal Setting Conference Meeting Minutes and Packet – January 21, 2023
- C. Work Session Meeting Minutes – January 25, 2023
- D. City Council Meeting Minutes – January 25, 2023

A motion was made by Councilor Shankle to approve the Consent Agenda. Vote passed 6-0, with all Councilors voting Aye.

PRESENTATIONS, PROCLAMATIONS, CEREMONIES

None.

PUBLIC COMMENT

Tom Luttrell, Molalla resident, felt that it was unfair that the Mayor was trying to remove his girlfriend from serving on the Planning Commission.

PUBLIC HEARINGS

- A. Emerio Designs and City Staff – Housing Needs Analysis Presentation (Zinder).....Pg. 187
 - o Staff Report and Draft Housing Needs Analysis.....Pg. 189
 - o Email #1 – City Staff and DLCDC Staff re: HNA Presentation.....Pg. 211
 - o Email #2 – City Staff and DLCDC Staff re: HNA Presentation.....Pg. 214
 - o Example Buildable Lands Inventory (BLI) for City of Waldport.....Pg. 218
- Public Comment related to Public Hearing*
 - o Mike Simmons, non-resident.....Pg. 233
 - o Char Pennie, residentPg. 235

Senior Planner, Dan Zinder provided the staff report for the Housing Needs Analysis (HNA) and residential Buildable Lands Inventory (BLI).

Jennifer Arnold with Emerio Designs, presented a report to Council. Her company was asked by the State and DLCDC to provide an appendix to the HNA. This report is intended to show the work of the HNA. She described it as a working document, as

items are changing daily. This has to do with various zoned properties that are being considered in the Housing Needs Analysis. All zones must be considered in this analysis. The State is providing further details. Consideration towards mixed zones are being discussed.

Presentaton to Planning Commission in January showed 143 acres of needed land. As items have been changed, 133 acres are needed for expansion. Wetlands are taken into account. These areas are not typically used for development. Preliminary reports indicated that the city has seventy percent available use for commercial property and thirty percent for residential.

Ms. Arnold described the Safe Harbor provision next, which is the States recommended use for HNAs and determining residential, commercial and industrial use.

Councilor Botsford questioned whether the percentages currently provided would remain the same. She’s concerned that with the State mandating more residential zoning, that it could impact Molalla’s needed commercial use. Ms. Arnold explained that Phase II of this process will be to look at what the current Code states, then perhaps amend it to require thirty percent of land for residential.

Councilor Vermillion thanked Mr. Zinder for responding to his emailed questions. (Attached to these meeting minutes.) He inquired about the rule of 55/25/20 for development, and whether that was an Administrative Rule. Ms. Arnold stated that if we go by Safe Harbor rules opposed to a thirty-year analysis, then yes, those are the requirements. This is referring to the Buildable Lands Inventory and requirements by the State of 55% of land being low-density, 25% medium-density, and 20% high-density. Examples were highlighted from the 2022-2042 BLI Methodology Appendix.

Discussion between Council and Mr. Zinder and Ms. Arnold continued. Mr. Zinder explained that he would continue to present updates to Council regarding the HNA and BLI documents as they are available.

Mayor Keyser opened the Public Hearing for the Housing Needs Analysis at 7:49pm.

Mike Simmons, non-resident, is very interested in a positive outcome for Molalla and it’s buildable needs. Mr. Simmons provided a memo to Council, asking to remove any consideration of residential housing over commercial land. It is not part of the Safe Harbor factoring. He feels it’s important that parks and schools have their own plan conducted. He would like for housing needs to have its own consideration.

David Potts, Molalla resident, is concerned that the report by PSU is inaccurate. His statements are included in the Council packet for this meeting.

Joe Herrera, Meadowbrook, would like to see more single-home dwellings, with commercial and industrial buildings that create more jobs. His concern is that we are looking at temporary living opposed to permanent housing.

Mayor Keyser closed the Public Hearing at 7:59pm.

ORDINANCES AND RESOLUTIONS

None.

GENERAL BUSINESS

- A. R. Higginbotham Public Comment Request – Molalla Municipal Code, Chapter 6.08 Farm Animals

Mr. Higginbotham requested that Council consider adopting Clackamas County’s rule for keeping farm animals. He provided a copy of the ordinance. He also feels that having to call the Police to enforce too many chickens in someone’s yard is not a good use of Police resources. He feels an update to our current Code language is necessary. Council requested that the City Recorder schedule a Work Session to discuss this topic.

- B. Planning Commission Ordinance Review (Huff/Keyser).....Pg. 242

City Recorder Teets stated that this item had come up during the Goal Setting Conference on January 21, 2023. She presented two draft Ordinances. Council discussed the desire to have letter B in the Ordinances. Specific language was discussed.

After collaborating, the consensus was to direct staff to bring the Ordinance to read, "Absences or tardies from two regular meetings per calendar year may disqualify a member. The Planning Commission may also request that the Mayor appoint a replacement. Members must notify staff via email or telephone to be excused from regular scheduled meetings."

Mayor Keyser made an announcement that once the Ordinance was passed, all Planning Commissioners will start with a clean-slate. He also stated that he had a brief conversation with Planning Commission Chair Eaglebear, and they would be in contact with each other regarding attendance.

C. Planning Commissioner Termination (Keyser)

This item was removed from the agenda by Council.

STAFF COMMUNICATION

- City Recorder Teets reminded citizens that there is a Budget Committee seat open. She encouraged interested parties to contact her.

COUNCIL COMMUNICATION

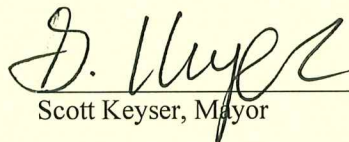
- Councilor Botsford announced that the next Chamber of Commerce luncheon will be held at Quanex.
- Councilor Vermillion was invited to attend a Community Visioning process that was put on by the Molalla River School Board. The school district is in the beginning stages of going out for a Bond. He also thanked Andy Peters and Adam Shultz for the tour of Public Works departments.
- Councilor Robles encouraged the community to explore the Library. The Lego Club is in full swing and a great activity for kids. She also announced that the Parks CPC will now be meeting the first Monday of each month at 5:30pm at City Hall.
- Councilor Shankle explained that a Beautification & Culture CPC meeting is coming soon, so she'll have more to report at the next meeting.
- Council President Newland spoke about the Disc Golf course being replaced at Ivor Davies Park. She feels that it is our responsibility as citizens to take our parks back by showing up there. She also shared that benches are being selected for Strawberry Park.
- Mayor Keyser shared that last Thursday the C4 meeting was held. Appointments to Metro Committees took place at that time. Mayor Hodson was appointed to the Tolling Committee that is planning for I-5 tolling. Mayor Keyser also addressed the need for a camping ordinance in the city, and that it is currently in process.

For the good of the order, the City Recorder asked which city Mayor Hodson represents. Mayor Keyser reported Canby.

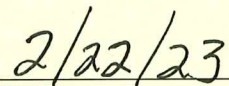
For the complete video account of the City Council Meeting, please go to YouTube
"Molalla City Council Meetings – February 8, 2023"

ADJOURN

Mayor Keyser adjourned the meeting at 8:40pm.



Scott Keyser, Mayor



Date

ATTEST:



Christie Teets, CMC
City Recorder



Oregon

Tina Kotek, Governor

Department of Land Conservation and Development

Community Services Division

635 Capitol Street NE, Suite 150

Salem, Oregon 97301-2540

Phone: 503-373-0050

Fax: 503-378-5518

www.oregon.gov/LCD

February 3, 2023

Dan Zinder
Senior Planner
City of Molalla
117 N Molalla Ave
Molalla, OR 97038



Re: City of Molalla Draft Housing Needs Analysis

Dear Mr. Zinder,

Thank you for sending notice to the Department of Land Conservation and Development (DLCD) of the public hearing for the city's Housing Needs Analysis (HNA). We also appreciate how closely you and your consultant team have been working with DLCD staff on this project, which is partially funded by a grant from DLCD's technical assistance grant program.

We also want to acknowledge the city's efforts to begin a sequential Urban Growth Boundary (UGB) review process to address the land needs that are expected to result from the Housing Needs Analysis. We look forward to working with you through those efforts. Once the sequential UGB review work plan is approved by the DLCD director, the City will be able to formally adopt the HNA. We expect this will occur in late spring or early summer 2023, based on Molalla's plan to submit the sequential UGB work plan to DLCD before the end of February 2023.

Because the Housing Needs Analysis is part of the City's Comprehensive Plan, the City should adopt written findings in a final staff report that demonstrate consistency with the goals and policies of the City's Comprehensive Plan. We also recommend adopting findings demonstrating compliance with statewide planning goals as well as applicable state statutes and rules.

DLCD has reviewed the draft HNA document and has the following comments:

1. The department requests opportunity and time to review the Buildable Lands Inventory (BLI). The BLI should provide answers to the following questions as well as demonstrate the methodology used, in general.
 - a. What criteria were used to identify infill potential parcels? Furthermore, how was middle housing accounted for? Does the analysis assume 3% of existing lots will be developed with a middle housing unit?
 - b. How were wetlands and other sensitive lands included (or not) in buildable land? These lands may only be considered unbuildable if there are adopted protections that preclude or significantly limit development in those areas. For example, if development is permitted in wetlands, subject to DSL and USACOE approval, they should be considered to be buildable. If locally protected, wetlands would not be buildable.
 - c. Do "approved projects" identified on the BLI map have building permits yet? If not, they are usually counted as buildable lands, unless those units were included in your existing housing inventory.

- d. Does the analysis use the assumption of 25% of land area needed for future public facilities (right of way, etc)? Or some other percentage?
2. The city is opting to follow the “safe harbors” identified in OAR 660-024-0040(8)(f) and listed below.
 - a. A housing mix of 55% LDR, 25% MDR, and 20% HDR, and
 - b. Required overall minimum densities of 5 units/acre, assumed densities for UGB analysis of 7 units/acre, and all residential zones to allow at least 9 units per acre.

Please note that the city will be required to adopt zoning that ensures buildable land in the urban area, including land added to the UGB, cannot develop at an average overall density less than the applicable “safe harbor” required overall minimum density of 5 units/acre. It appears Molalla’s current residential density standards may already achieve this minimum density, although the city would need to show the calculations to demonstrate this is the case, at the time of UGB expansion.

As an alternative, you have the option of forecasting your future land needs by zone based on analysis of achieved densities in recent residential developments in each of your zones, instead of using the “safe harbor.”

3. The HNA assumes a fair amount of multi-family residential development in commercial zones. We urge you to compare development capacity assumed for commercially zoned land compared to recent experience in Molalla, to determine if the proposed 7 units per acre assumption is realistic.
4. The final unit count for total housing need should include a discount/allowance for group living to meet a portion of their total residential land needs. Group quarters include such shared housing situations as nursing homes, prisons, dorms, group residences, military housing, or shelters. These residents are typically excluded from the estimated population total, before determining the amount of other types of housing that are needed for non-group households.

We request that in the coming weeks the City makes available the Buildable Land Inventory. DLCD staff will provide a timely review and work with the City if the Department has any concerns about the methodology. Thank you for your good work to plan for future housing needs in Molalla.

Sincerely,



Gordon Howard
DLCD Community Services Director

cc. Kelly Reid, DLCD Regional Representative
Kevin Young, DLCD Senior Urban Planner

City of Molalla

2022-2042 Buildable Lands Inventory
Methodology Appendix

BLI Methodology

Molalla is grouped into the category of cities with a future population of 10,001 – 25,000. This analysis used the as indicated in Table 14, this method assumes 2,077 net new dwelling units, with a required mix as follows: 55% low-density, 25% medium-density, and 20% high-density. This method requires an overall (citywide) minimum density within residential base zones of: 5 dwellings per net acre; 7 dwellings/acre for UGB analysis; and the city must allow 9 units per acre overall (citywide) on its buildable residential land base. This method results in a potential UGB residential land need of 143 net buildable acres which accounts for a 25% reduction in land area to accommodate required right-of-way improvements and public lands.

The Safe Harbor Combined Housing Mix and Density Method was used for this analysis. In accordance with OAR 660-008-0005 (2), an estimate of buildable land inventory within the Molalla Urban Growth Boundary has been created to determine that amount of land available to meet housing needs. The BLI analysis used current GIS data provided by City Staff, Clackamas County Assessor parcel information and US Census data to make the following calculations for vacant land in accordance with OAR 660-024-0050(3)(a-b):

- **Step 1:** Calculate gross vacant acres by plan designation, including classifications for fully vacant and partially vacant (infill potential) parcels.
 - Per Exhibit 3: 32.99 acres of residential land is further broken down as follows:

R-1	15.78 ac
R-2	5.99 ac
R-3	11.22 ac
C-1	3.21 ac
C-2	38.11 ac

- **Step 2:** Calculate gross buildable vacant acres by plan designation by subtracting land that is constrained from future development, such as existing public right-of-way, parks and open space, steep lots, and floodplains.
 - For the purposes of this analysis, it was assumed that a 25% reduction in land area adequately accounts for open space, right-of-way, parks, and constrained lands.
 - Equation: (Step 1) X (25%)

R-1	3.94 ac
R-2	1.50 ac
R-3	2.81 ac
C-1	0.80 ac
C-2	9.53 ac

- **Step 3:** Calculate net buildable vacant acres by plan designation by subtracting future public facilities such as roads, schools, parks, and gross buildable vacant acres.
 - Equation: (Step 1) - (Step 2)

R-1	11.83 ac
R-2	4.49 ac
R-3	8.41 ac
C-1	2.41 ac

C-2	28.58 ac
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- **Step 4:** Determine total net buildable acres by plan designation by adding redevelopable acres to net buildable vacant acres.
 - The basic calculations for redevelopable properties were completed by Molalla City Staff utilizing current GIS data and visual inspection of properties.
 - Total net redevelopable properties by plan:

R-1	21.42 ac
R-2	0.57 ac
R-3	14.10 ac
C-1	2.41 ac
C-2	28.58 ac

- Equation: (Step 3) + (total net redevelopable properties by plan)

R-1	33.25 ac	Total: 60.82 ac
R-2	5.06 ac	
R-3	22.51 ac	
C-1	4.82 ac	Total: 61.98 ac
C-2	57.16 ac	

Molalla development standards allow multi-family residential development to be constructed on property with a commercial plan designation. It is not anticipated that all commercial land will be developed as multi-family residential but because it is permitted, it was considered at 7 dwelling units/acre density.

HNA Conclusion (Updated):

From the Buildable Lands Inventory Analysis, we know that the City of Molalla has 60.82 net acres of vacant/buildable and infill potential land with a residential comprehensive plan designation within the Urban Growth Boundary and City Limits. Further broken down, Molalla staff has identified 33.25 net acres within the R-1 zone, 5.06 net acres within the R-2 zone, and 22.51 net acres in the R-3 zone. Using the 7 units per net acre density and accounting for a 25% reduction (right-of-way and public facilities), the current available land can accommodate approximately 425 of the 1,662 (Calculation: Table 14 R-1 + R-2 # of dwellings column) attached and detached dwelling units (including manufactured dwellings) needed for the projected population growth by 2042. With current available land accommodating for 25% of the needed dwelling units, this leaves a deficit of 1,237 units.

Properties with a commercial plan designation within the Comprehensive Plan permit medium-high density dwellings above commercial uses. This development is typically seen in the form of apartment or condominium dwelling units. Based on the Buildable Lands Inventory summary, Molalla staff have identified 61.98 acres of vacant/buildable and infill commercial properties (4.82 ac within C-1 zone and 57.16 ac within the C-2 zone) as shown in Exhibit 3 and further described in this document. Assuming only 30% of the commercial lands are developed as residential, an

additional 303 multi-family units can be accommodated in land currently designated residential and commercial in the Comprehensive Plan at 7 units per acre density.

A total of 728 residential dwelling units can be accommodated under current land use designations leaving a deficit of 934 dwelling units.

The Safe Harbor method results in a potential residential land need of 133 net buildable acres.



Oregon

Tina Kotek, Governor

Department of Land Conservation and Development

Community Services Division

635 Capitol Street NE, Suite 150

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Sincerely,



Gordon Howard
DLCD Community Services Director

cc. Kelly Reid, DLCD Regional Representative
Kevin Young, DLCD Senior Urban Planner

From: [Dan Zinder](#)
To: [Dan Huff](#); [Scott Keyser](#); [Jody Newland](#); [Leota Childress](#); [Terry Shankle](#); [Crystal Robles](#); [Eric Vermillion](#); [Rae-Lynn Botsford](#)
Cc: [Christie Teets](#); [Suzanne Baughman](#); [Jennifer Arnold](#); [Mac Corthell](#)
Subject: RE: HOUSING NEED SAFE HARBOR: The Mix / Density Safe Tables
Date: Wednesday, February 8, 2023 10:00:25 AM

Good morning Mayor and Council,

I have a scheduled call with DLCD today to discuss some of the Safe Harbor implications Councilor Vermillion asked about as we have some of the same questions. Our Consultant with Emerio Design and I will clarify tonight. From the 55/25/20 split, the zoning type that we are most deficient in is medium-density residential (about 11.5% actual vs 25% target). Currently, our R-3 zoned lands are actually above the target (about 23% actual vs. 20% target). What I'm not sure about is whether the City would be required to target that split citywide when we rezone/expand or simply incorporate that split into our UGB expansion lands and rezoning efforts.

In the interim, I wanted to address a couple of points regarding our zoning code raised by Councilor Vermillion below so we're talking apples to apples as we go forward. Our zoning map includes three residential districts that we currently utilize: R-1 – Low-Density Residential, R-2 – Medium-Density Residential, and R-3 Medium/High-Density Residential. There's also an R-5 zone in the code to which the City has no dedicated land. If you look at the [allowed uses table from MMC 17-2.2.030](#) the biggest differences between the zones are:

- **Density** – R-1 allows for 4-8 units, R-2 allows for 6-12 units, and R-3 allows for 8-24 units (R-5 allows 6-24 units). The highest density zones also allow for smaller minimum lot sizes
- **Multifamily is allowed in R-2 and R-3 and Manufactured Home Parks allowed in R-3**

Then there are allowances for senior housing and care facilities within the higher zoning districts.

Last, the model code adopted in 2017 has always allowed for duplexes within the R-1 zone and Per Ordinance 21-09 passed by Council to comply with OR HB 2001 duplexes are allowed on the same lot sizes as SFR.

What's important to note here is that by and large, the higher density zones do not restrict single-family and other ownership models found in R-1. In fact, some of the condo and townhome developments found in the R-3 zone (Stacy LN condos, the Garden Terrace townhomes, and the condos along E Main ST come to mind along with a few other smaller projects) occur at densities that would be allowed if they were built today. You can build a single-family residential neighborhood within the higher density zones, they just *can* be built at higher densities (note that "8" is the high point for R-1 and the low point for R-3).

To that effect, once the HNA is completed, the Housing Production Strategy document (HPS), the second document within the sequential process, will be arriving at your inboxes in coming months. This process will update our Goal 10 (housing) policies to help produce the needed housing identified in the HNA. While the HNA is largely data driven and simply addresses the land need, the HPS allows cities to shape policies that work for their respective visions. I've provided a list of potential strategies that DLCDC has provided at the link below. We are not committed to any/all of these specific strategies per say but it provides a framework to start thinking about what kind of policies might work for us. From the feedback I've heard from Council and the community, policies that promote ownership models and are more restrictive towards market rate rental models would be valued and some of the policies below address those desires. This is our chance to make those policies.

https://www.oregon.gov/lcd/UP/Documents/Full%20Cover%20Letter%20and%20HPS%20List_with%20links.pdf

Thank you and look forward to chatting with you all tonight.

Best,

Dan Zinder

503.759.0226

From: Dan Huff <dhuff@cityofmolalla.com>

Sent: Tuesday, February 7, 2023 11:29 AM

To: Scott Keyser <skeyser@cityofmolalla.com>; Jody Newland <jnewland@cityofmolalla.com>; Leota Childress <lchildress@cityofmolalla.com>; Terry Shankle <tshankle@cityofmolalla.com>; Crystal Robles <crobles@cityofmolalla.com>; Eric Vermillion <evermillion@cityofmolalla.com>; Rae-Lynn Botsford <rbotsford@cityofmolalla.com>

Cc: Christie Teets <cteets@cityofmolalla.com>; Suzanne Baughman <sbaughman@cityofmolalla.com>; Dan Zinder <dzinder@cityofmolalla.com>

Subject: FW: HOUSING NEED SAFE HARBOR: The Mix / Density Safe Tables

Mayor and Council – Councilor Vermillion sent us some insightful questions regarding the Housing Need Safe Harbor that I wanted to share with the balance of Council. Senior Planner, Dan Zinder will be leading the presentation and has indicated that these points will be addressed tomorrow night. If you all have other thoughts that need special attention, please let us know.

Dan Huff

City Manager

City of Molalla, Oregon

(503)829-6855



PUBLIC RECORDS LAW DISCLOSURE

This e-mail is a public record of the City of Molalla and is subject to public disclosure unless exempt from disclosure under Oregon Public Records Law. This e-mail is subject to State Retention Schedule.

From: Eric Vermillion <evermillion@cityofmolalla.com>

Sent: Tuesday, February 7, 2023 9:47 AM

To: Dan Huff <dhuff@cityofmolalla.com>; Mac Corthell <mcorthell@cityofmolalla.com>

Subject: HOUSING NEED SAFE HARBOR: The Mix / Density Safe Tables

Questions for the City Re: Feb 8

UGB -

1. *What factors, thought process were involved when choosing the safe harbor table 1 over forecasting our future land needs by one of the other 2 HOUSING NEED SAFE HARBOR: The Mix / Density Safe Tables. And I'm not*

sure where this fits but what Kelly Reid stated in the email 2-1-23, “by zone based on analysis of achieved densities in recent residential developments in each of your zones”.

2. *Am I reading all the data correctly to arrive at my conclusion:*

- In 2020 we were:
 - R-1 72.9% (single family + Mobile home)
 - R-2 11% (du, tri & quadplexes + townhouses)
 - R-3 15.6% (Apartments)
- Building Permits 2018 - 2022
 - R-1, 69%
 - R-2, 21%
 - R-3, 9%
- Safe harbor %
 - R-1, 55%
 - R-2, 25%
 - R-3, 20%

Conclusion:

Under the Housing Density Safe Harbor, Molalla would need to increase the construction of Apartments and the multiplexes and reduce the number of Single family homes.

It appears that the city is recommending a method that increases the R-2 & R-3 Dwelling mix. This would equate to a need for reducing the R-1 Dwelling mix and increase the density of the city by the escalating the R- 2 & 3 zones.

3. *And please explain what Kelly Reid means by “significant implications” in the email dated Feb 1, 2023 at 8:51am*

Kelly Reid email dated Feb 1, 2023 8:51am: “The city is opting to follow the safe harbor” identified in OAR 660-024-0040(8) (f) and listed below. This has some **significant implications** for future zoning that we want to bring to your attention. A housing mix of 55% LDR, 25% MDR, and 20% HDR, and

1. A housing mix of 55% LDR, 25% MDR, and 20% HDR, and
2. Required overall minimum densities of 5 units/acre, assumed densities for UGB analysis of 7 units/acre, and all residential zones to allow at least 9 units per acre.

Please note that the city will be required to adopt zoning that ensures buildable land in the urban area, including land added to the UGB, cannot develop at an average overall density less than the applicable “safe harbor” Required Overall Minimum density of 5 units/acre. It appears Molalla’s current residential density standards may already achieve this minimum density, although the city would need to show the calculations to demonstrate this is the case, at the time of UGB expansion.

If that is not the desire of the city, you have the option of forecasting your future land needs by zone based on analysis of achieved densities in recent residential developments in each of your zones, instead of using the “safe harbor.”

Thank you for all you do!

From: [Mike Simmons](#)
To: [Mac Corthell](#); [Christie Teets](#); [Dan Zinder](#); msimmons@hotmail.com
Subject: Re: Notes on updated HNA
Date: Tuesday, February 7, 2023 4:50:13 PM

Hello Mac, Christie, Dan,

I asked Jesse for a full professional review of the posted Draft HNA as attached.
I will print 9 copies and bring them with me for my 3 minutes on record tomorrow.

Hopefully you find this helpful, in short the recommendation is to:

1. Clearly State the Methodology used for BLI point by point, this section is confusing and some technical terms are being used as interchangeable and they are not.
2. Remove any consideration of housing in commercial lands. This is a risk to the City, is not normal and has not been done in other small nearby cities and is not a Safe Harbor path.
3. Remove the comments of Parks and Public land from the HNA. They are not actually being accounted for in this the HNA and need their own study. the inclusion of the term Parks should only be to note it is excluded from this study.

Best Regards,
Mike Simmons

From: Jesse Winterowd <jesse@winterbrookplanning.com>
Sent: Tuesday, February 7, 2023 4:15 PM
To: Mike Simmons <msimmons616@hotmail.com>
Subject: RE: Notes on updated HNA

Hi Mike, attached is a word format draft memorandum. I'm happy to make additional edits as needed, or finalize in a pdf format. Just let me know. We can also go over this on the phone if that helps.

Thank you! -Jesse

From: Jesse Winterowd
Sent: Monday, February 6, 2023 3:35 PM
To: Mike Simmons <msimmons616@hotmail.com>
Subject: Notes on updated HNA

Hi Mike,

I made some notes on the updated HNA (attached). Would probably make sense to go over this with you.

Mike Simmons

2/8/2023

I am very interested in helping Molalla get an outcome in the end that is best for Molalla's long-term needs. As such I don't believe the approach should be to see how its needs can be squeezed into currently available space but instead an honest evaluation of all types of needs.

To this end I contracted WinterBrook Planning to provide a peer review Memo of the draft HNA from Emeril as WinterBrook is intimately familiar with Molalla, Safe Harbor definitions and UGB considerations in general.

I have submitted that memo by email and have provided copies to update to my preliminary comments.

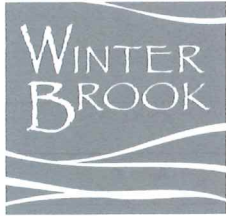
In Summary those recommendations are:

1. Clearly State the Methodology used for BLI point by point as this section is confusing, and some technical terms are being used as interchangeable while they actually are not. DLCDC comments also support this need.

2. Remove any consideration of housing in commercial lands.
 1. This is not normal and has not been done in Molalla to date or other small nearby cities such as Estacada.
 2. This is not a Safe Harbor path.
 3. This opens a risk of challenge to the Cities adoption process.
 4. If residential units are in fact placed above commercial units it is a bonus, but often these work-live type units are only live units and commercial is lost.
 5. There is a known need for additional commercial land.
 6. DLCDC comments also support this.

3. Remove the comments concerning Parks and Public land from the HNA.
 1. Land for parks and Schools is not actually being accounted for in this the HNA and need their own study.
 2. The 25% net/gross ration is consumed by streets, etc. not parks.
 3. Per the comp plan ratios of park to people a consideration of Schools, the parks and school needs could be roughly approximated at 140-180 acres on their own, and at last count there is nowhere near that available.
 4. The inclusion of the term Parks then should only be to note it is excluded from this HNA study.

Memorandum



To: Mike Simmons
From: Jesse Winterowd, AICP, PMP
Date: February 7, 2023
Re: **Molalla HNA Review Notes**

Introduction

This memorandum provides feedback on the 2022-2024 Molalla Housing Needs Analysis (HNA) included in the January 4, 2023 Planning Commission packet.

Big picture, Molalla currently accommodates about 10,000 people on approximately 540 acres of residential land – not including parks and school land (which is predominantly zoned PSP, not residential). Of this residential land supply, only 26 acres remain vacant. The HNA appears to conclude that housing for an additional 5,000 people, *and* all future parks and schools, can be accommodated on 143 additional net buildable acres of land.

Three general areas could use additional consideration:

1. Buildable Lands Inventory (BLI). The HNA did not include detailed methodology for the BLI, which raises several questions.
2. Allocation of needed housing to Commercial land.
3. Park and school land need.

Each of these are addressed below, with a recommendation for approach. Direct quotes from the HNA in this review are indicated in ***bold italic***.

Buildable Lands Inventory

As noted above, the HNA did not include a detailed methodology. The overview methodology (HNA, p.11) is quoted below:

o Calculate gross vacant acres by plan designation, including classifications for fully vacant and partially vacant (infill potential) parcels.

Comment: There are many assumptions that can be used to determine partially vacant land. A detailed methodology would clarify what assumptions this BLI used. What is the threshold for

qualifying for additional development potential? Is the developed portion of the partially vacant property removed? Is the entire property assumed to be fully available, or just the currently undeveloped portion?

o Calculate gross buildable vacant acres by plan designation by subtracting land that is constrained from future development, such as existing public right-of-way, parks and open space, steep lots, and floodplains.

Comment: The list of constraints *seem* fine. However, it is normal to include a detailed methodology for each constraint. It would also be helpful to have a summary of constraints. How many park or open space acres were removed from supply calculations? Did the BLI use OAR 660-008 guidance (e.g., 25% slope break)? What does “steep lots” actually mean?

o Calculate net buildable vacant acres by plan designation by subtracting future public facilities such as roads, schools, parks, and gross buildable vacant acres.

Comment: This definition for “net buildable acres” is inconsistent with OAR 660-024-0010(6), which limits the net conversion to rights-of-way: “*Net Buildable Acre*” consists of 43,560 square feet of residentially designated buildable land after excluding future rights-of-way for streets and roads.

The methodology does not indicate what assumptions it uses to determine or subtract “future public facilities such as roads, schools, parks”.

Neither the methodology nor the HNA describe the gross-net conversion. It’s unclear from the evidence presented, other than this one line of vague methodology, that there has been a gross-net conversion at all. It’s unclear what impact this methodology has on need for parks or schools, as this is the only reference to future park or school needs.

o Determine total net buildable acres by plan designation by adding redevelopable acres to net buildable vacant acres.

Comment: The use of terminology is inconsistent throughout the HNA and not clearly defined. Is the assumption that “redevelopable” means “partially vacant” as identified (but also not defined) in the first methodology point?

Recommendation: Refine and provide BLI methodology for review. Use standard “net buildable” definition and assign right-of-way percentage based on actual development. Evaluate school and park needs (see Park and School Land Need section below) and plan to accommodate them, OR clearly state that park and school needs are not being evaluated or accommodated in this HNA.

Commercial Land for Housing

The HNA assumes vacant and potential redevelopment commercial properties are functionally equivalent to vacant and potential redevelopment residential land (see pp. 18-20 of the HNA). Assuming commercial land is the same as residential land for housing needs is not necessary, does

not seem to be reasonable in Molalla, does not appear to be supported by evidence, and isn't related to any safe harbor.

It's also exceedingly unclear how development of residential above retail in commercial zones will meet park and school land need – as the BLI methodology (see “net buildable” discussion above) indicates it does.

P.19 of the HNA says:

“C-1 and C-2 are commercially zoned properties but allow for limited residential development. Manufactured homes are permitted within the C-1 and C-2 zones along with residential units above a commercial use. Molalla has 20.49 acres of commercially zoned land split between the C-1 and C-2 zones. To date, Molalla has 123 residential units within this zoning designation and equates to the second largest cohort in Exhibit 2.”

Comment: There are a few confusing elements with this paragraph:

1. Manufactured homes are not permitted with the C-1 and C-2 zones according to Table 17-2.2.030 as published.¹
2. It's unclear what this paragraph is trying to establish by saying that 123 residential dwelling units are within commercial zones.
 - a. Are any of these units accounted for in actual development summaries?
 - b. Would any of these units be allowed under current zoning regulations?
 - c. Do we have evidence of residential above retail development in Molalla?
3. Exhibit 2 is on p.11 of the HNA, and is simply the BLI map. What does “equates to the second largest cohort” refer to? What is the relevance?

Table 14: Safe Harbor Housing Mix and Density

Dwelling Mix	Percent	Number of Dwellings	Notes
Low Density Residential ¹ (R-1)	55%	1,143	See OAR 660-024: Table 1
Medium Density Residential (R-2)	25%	519	See OAR 660-024: Table 1
Medium-High Density Residential (R-3)	20%	415	See OAR 660-024: Table 1
Total	100%	2,077	

¹Includes Mobile Homes

Comment: Table 14 of the HNA (p.20, inserted above) uses an OAR 660-024 safe harbor housing mix, which specifically indicates a mix of residential zones to meet housing need. Assigning

¹ https://library.qcode.us/lib/molalla_or/pub/municipal_code/item/title_17-division_ii-chapter_17_2_2?view=all

commercial land to meet residential zone requirements is inconsistent with the HNA's own table and the safe harbor.

Recommendation: Molalla's existing UGB was established in 1980 and planned to meet housing needs through the year 2000. Molalla is now is over 40 years into its planned 20-year UGB. It currently has a population 50% higher than planned for the UGB. Molalla has not had sufficient land to meet 20-year housing needs for most of the last 20 years. Even so, my understanding is it *still* isn't seeing a market for housing above retail, because Molalla is not a high density Metro city.

For all of the reasons identified in this section, remove the assumption to meet needed housing in commercial zones. If Molalla actually sees development of housing above retail when provided an adequate supply of residential land, incorporate that assumption into the next review.

Park and School Land Need

As noted above in the BLI discussion, the HNA seems to indicate that park and school needs are accounted for in a net-gross conversion. However, the HNA does not otherwise evaluate or even consider park or school land needs, and this may be a significant problem for Molalla.

Molalla is anticipated to grow by about 50% (or over 5,400 people) over the next 20 years. The HNA assumes a household size of 2.72 people per household, which will likely include a good number of families with children.

Molalla River School District should be involved or at least consulted in the planning process. MRSD serves Molalla and the surrounding communities and currently has one elementary, one middle, and one high school in Molalla. It's likely Molalla will a need at least another elementary school and possibly another middle school to serve urban population growth – this could be approximately 20-60 acres of school land need. Molalla should plan to provide enough land within its UGB so that MRSD can actually find urban land within Molalla to locate the schools appropriately.

Molalla also has a Comprehensive Plan policy (see Goal 8, p.26 of Comprehensive Plan) to provide 1.25 acres of parkland per 100 population (1.0 per 100 population for developed parks). For the planned population of over 15,400 Molalla would need to provide approximately 154 acres of developed parkland. The Comprehensive Plan indicates that Molalla has 36 acres of developed parkland. In order to meet Comprehensive Plan parkland policies, Molalla should plan to accommodate approximately 120 acres of additional parks within the 2042 UGB.

As noted above, park and school land needs are likely to amount to 140-180 additional acres of land need. The HNA identifies a total of 143 net buildable acres needed to accommodate 5,000 additional people, and seems to fold in parks and schools to this need as well.

Recommendation: Actually evaluate park and school land needs, and plan to accommodate; OR if park and school needs are not being addressed in the HNA, be clear they are not so that they can be independently addressed and accommodated in the sequential review process.

Table 1: Housing Mix/Density Safe Harbors

A. Coordinated 20- Year Population Forecast	B. Housing Density Safe Harbor Numbers are in Dwelling Units (DU) per net buildable acre	C. Housing Mix Safe Harbor (Percentage of DU that Must be <i>Allowed</i> by zoning)		
		Low Density Residential	Medium Density Residential	High Density Residential
Less than 2,500	<ul style="list-style-type: none"> Required Overall Minimum: 3 Assume for UGB Analysis: 4 Zone to Allow: 6 	70%	20%	10%
2,501 – 10,000	<ul style="list-style-type: none"> Required Overall Minimum: 4 Assume for UGB Analysis: 6 Zone to Allow: 8 	60%	20%	20%
10,001 – 25,000	<ul style="list-style-type: none"> Required Overall Minimum: 5 Assume for UGB Analysis: 7 Zone to Allow: 9 	55%	25%	20%
More than 25,000 but not subject to ORS 197.296	<ul style="list-style-type: none"> Required Overall Minimum: 6 Assume for UGB Analysis: 8 Zone to Allow: 10 	50%	25%	25%

- **Low Density Residential:** A residential zone that *allows* detached single family and manufactured homes and other needed housing types on individual lots in the density range of 2-6 units per net buildable acre (DU/NBA). The specified mix percentage is a maximum; a local government may allow a lower percentage.
- **Medium Density Residential:** A residential zone that *allows* attached single family housing, manufactured dwelling parks and other needed housing types in the density range of 6-12 units per net buildable acre. The specified mix percentage is a minimum; a local government may allow a higher percentage.
- **High Density Residential:** A residential zone that *allows* multiple family housing and other needed housing types in the density range of 12-40 units per net buildable acre. The specified mix percentage is a minimum; a local government may allow a higher percentage.
- **More than 25,000 but not subject to ORS 197.296:** The current population estimate for the city is less than 25,000 but the 20-year population forecast for the UGB is 25,000 or more. This safe harbor is not available for a jurisdiction subject to ORS 197.296 at the time of a UGB amendment.

**Table 2: Alternative Density Safe Harbors for
Small Exception Parcels and High Value Farm Land**

A. Coordinated 20-Year Population Forecast	B. Small Exception Parcels added to the UGB (Dwelling Units per net buildable acre)	C. High Value Farm Land added to the UGB (Dwelling Units per net buildable acre)
Less than 2,500	<ul style="list-style-type: none"> • Assume for UGB Analysis: 2 	<ul style="list-style-type: none"> • Required Overall Minimum: 5 • Assume for UGB Analysis: 6 • Must Allow: 8
2,501 – 10,000	<ul style="list-style-type: none"> • Assume for UGB Analysis: 4 	<ul style="list-style-type: none"> • Required Overall Minimum: 6 • Assume for UGB Analysis: 8 • Must allow: 10
10,001 – 25,000	<ul style="list-style-type: none"> • Assume for UGB Analysis: 5 	<ul style="list-style-type: none"> • Required Overall Minimum: 7 • Assume for UGB Analysis: 9 • Must Allow: 11
More than 25,000 but not subject to ORS 197.296	<ul style="list-style-type: none"> • Assume for UGB Analysis: 6 	<ul style="list-style-type: none"> • Required Overall Minimum: 8 • Assume for UGB Analysis: 10 • Must allow: 12

- The standard Housing Density Safe Harbor density assumptions apply to land within the existing UGB and to land within the expanded UGB that is *not* “Small Exception Parcels” or “High Value Farm Land.” The standard Housing Mix safe harbor in Table 1 must be applied to ALL land in the UGB, including Small Exception Parcels and High Value Farmland added to the UGB.
- High Value Farmland must be planned and zoned to achieve at least two units more per net buildable acre than required by the standard Housing Density safe harbor.
- A Small Exception Parcel is a parcel five acres or less with a house on the property.
- “Not subject to ORS 197.296” means that the current population estimate for the city is less than 25,000 but the population forecast is 25,000 or more. This safe harbor is not available for a jurisdiction subject to ORS 197.296 at the time of a UGB amendment.

**Table 3: Methodology to Calculate Housing Mix for the
“Incremental Housing Mix Safe Harbor” in OAR 660-024-0040(8)(i)**

Example 1: The developed housing mix in the UGB currently consists of 93% Low Density, 6% Medium Density and 1% High Density.

Step 1: 5% + 1% = 6% High Density Residential

Step 2: 10% + 6% = 16% Medium Density Residential

Step 3: Total for Medium and High Density: 6% + 16% = 22% Medium and High Density Residential*

Step 4: 100% - 22% = 78% Low Density Residential

Under the Alternative Housing Mix **safe harbor** in OAR 660-024-0040(8)(i), buildable land in the UGB must be Zoned to Allow:

Safe Harbor Housing Mix = 78% Low Density, 16% Medium Density and 6% High Density.

Example 2: The developed housing mix in the UGB currently consists of 91% Low Density, 9% Medium Density and 0% High Density

Step 1: 5% + 0% = 5% High Density Residential

Step 2: 10% + 9% = 19% Medium Density Residential

Step 3: Total for Medium and High Density: 5% + 19% = 24% Medium and High Density Residential*

Step 4: 100% - 24% = 76% Low Density Residential

Under the Alternative Housing Mix **Safe Harbor** in OAR 660-024-0040(8)(i), buildable land in the UGB must be Zoned to Allow:

Safe Harbor Housing Mix = 76% Low Density, 19% % Medium Density and 5% High Density.

* If current housing mix has two tiers instead of three (for example, Low Density Residential and Medium-High Density, or Single-Family and Multi-Family), apply the “Low Density Residential” safe harbor percentage for Low Density Residential or Single-Family, and apply the combined “Medium Density” and “High Density” safe harbor percentages of 10% and 5%, or 15%, to Medium-High Density or Multi-Family.

From: [Dan Zinder](#)
To: [Dan Huff](#); [Scott Keyser](#); [Jody Newland](#); [Leota Childress](#); [Terry Shankle](#); [Crystal Robles](#); [Eric Vermillion](#); [Rae-Lynn Botsford](#)
Cc: [Christie Teets](#); [Suzanne Baughman](#); [Jennifer Arnold](#); [Mac Corthell](#)
Subject: RE: HOUSING NEED SAFE HARBOR: The Mix / Density Safe Tables
Date: Wednesday, February 8, 2023 10:00:25 AM

Good morning Mayor and Council,

I have a scheduled call with DLCD today to discuss some of the Safe Harbor implications Councilor Vermillion asked about as we have some of the same questions. Our Consultant with Emerio Design and I will clarify tonight. From the 55/25/20 split, the zoning type that we are most deficient in is medium-density residential (about 11.5% actual vs 25% target). Currently, our R-3 zoned lands are actually above the target (about 23% actual vs. 20% target). What I'm not sure about is whether the City would be required to target that split citywide when we rezone/expand or simply incorporate that split into our UGB expansion lands and rezoning efforts.

In the interim, I wanted to address a couple of points regarding our zoning code raised by Councilor Vermillion below so we're talking apples to apples as we go forward. Our zoning map includes three residential districts that we currently utilize: R-1 – Low-Density Residential, R-2 – Medium-Density Residential, and R-3 Medium/High-Density Residential. There's also an R-5 zone in the code to which the City has no dedicated land. If you look at the [allowed uses table from MMC 17-2.2.030](#) the biggest differences between the zones are:

- **Density** – R-1 allows for 4-8 units, R-2 allows for 6-12 units, and R-3 allows for 8-24 units (R-5 allows 6-24 units). The highest density zones also allow for smaller minimum lot sizes
- **Multifamily is allowed in R-2 and R-3 and Manufactured Home Parks allowed in R-3**

Then there are allowances for senior housing and care facilities within the higher zoning districts.

Last, the model code adopted in 2017 has always allowed for duplexes within the R-1 zone and Per Ordinance 21-09 passed by Council to comply with OR HB 2001 duplexes are allowed on the same lot sizes as SFR.

What's important to note here is that by and large, the higher density zones do not restrict single-family and other ownership models found in R-1. In fact, some of the condo and townhome developments found in the R-3 zone (Stacy LN condos, the Garden Terrace townhomes, and the condos along E Main ST come to mind along with a few other smaller projects) occur at densities that would be allowed if they were built today. You can build a single-family residential neighborhood within the higher density zones, they just *can* be built at higher densities (note that "8" is the high point for R-1 and the low point for R-3).

To that effect, once the HNA is completed, the Housing Production Strategy document (HPS), the second document within the sequential process, will be arriving at your inboxes in coming months. This process will update our Goal 10 (housing) policies to help produce the needed housing identified in the HNA. While the HNA is largely data driven and simply addresses the land need, the HPS allows cities to shape policies that work for their respective visions. I've provided a list of potential strategies that DLCDC has provided at the link below. We are not committed to any/all of these specific strategies per say but it provides a framework to start thinking about what kind of policies might work for us. From the feedback I've heard from Council and the community, policies that promote ownership models and are more restrictive towards market rate rental models would be valued and some of the policies below address those desires. This is our chance to make those policies.

https://www.oregon.gov/lcd/UP/Documents/Full%20Cover%20Letter%20and%20HPS%20List_with%20links.pdf

Thank you and look forward to chatting with you all tonight.

Best,

Dan Zinder

503.759.0226

From: Dan Huff <dhuff@cityofmolalla.com>

Sent: Tuesday, February 7, 2023 11:29 AM

To: Scott Keyser <skeyser@cityofmolalla.com>; Jody Newland <jnewland@cityofmolalla.com>; Leota Childress <lchildress@cityofmolalla.com>; Terry Shankle <tshankle@cityofmolalla.com>; Crystal Robles <crobles@cityofmolalla.com>; Eric Vermillion <evermillion@cityofmolalla.com>; Rae-Lynn Botsford <rbotsford@cityofmolalla.com>

Cc: Christie Teets <cteets@cityofmolalla.com>; Suzanne Baughman <sbaughman@cityofmolalla.com>; Dan Zinder <dzinder@cityofmolalla.com>

Subject: FW: HOUSING NEED SAFE HARBOR: The Mix / Density Safe Tables

Mayor and Council – Councilor Vermillion sent us some insightful questions regarding the Housing Need Safe Harbor that I wanted to share with the balance of Council. Senior Planner, Dan Zinder will be leading the presentation and has indicated that these points will be addressed tomorrow night. If you all have other thoughts that need special attention, please let us know.

Dan Huff

City Manager

City of Molalla, Oregon

(503)829-6855



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From: Eric Vermillion <evermillion@cityofmolalla.com>

Sent: Tuesday, February 7, 2023 9:47 AM

To: Dan Huff <dhuff@cityofmolalla.com>; Mac Corthell <mcorthell@cityofmolalla.com>

Subject: HOUSING NEED SAFE HARBOR: The Mix / Density Safe Tables

Questions for the City Re: Feb 8

UGB -

1. *What factors, thought process were involved when choosing the safe harbor table 1 over forecasting our future land needs by one of the other 2 HOUSING NEED SAFE HARBOR: The Mix / Density Safe Tables. And I'm not*

sure where this fits but what Kelly Reid stated in the email 2-1-23, “by zone based on analysis of achieved densities in recent residential developments in each of your zones”.

2. *Am I reading all the data correctly to arrive at my conclusion:*

- In 2020 we were:
 - R-1 72.9% (single family + Mobile home)
 - R-2 11% (du, tri & quadplexes + townhouses)
 - R-3 15.6% (Apartments)
- Building Permits 2018 - 2022
 - R-1, 69%
 - R-2, 21%
 - R-3, 9%
- Safe harbor %
 - R-1, 55%
 - R-2, 25%
 - R-3, 20%

Conclusion:

Under the Housing Density Safe Harbor, Molalla would need to increase the construction of Apartments and the multiplexes and reduce the number of Single family homes.

It appears that the city is recommending a method that increases the R-2 & R-3 Dwelling mix. This would equate to a need for reducing the R-1 Dwelling mix and increase the density of the city by the escalating the R- 2 & 3 zones.

3. *And please explain what Kelly Reid means by “significant implications” in the email dated Feb 1, 2023 at 8:51am*

Kelly Reid email dated Feb 1, 2023 8:51am: “The city is opting to follow the safe harbor” identified in OAR 660-024-0040(8) (f) and listed below. This has some **significant implications** for future zoning that we want to bring to your attention. A housing mix of 55% LDR, 25% MDR, and 20% HDR, and

1. A housing mix of 55% LDR, 25% MDR, and 20% HDR, and
2. Required overall minimum densities of 5 units/acre, assumed densities for UGB analysis of 7 units/acre, and all residential zones to allow at least 9 units per acre.

Please note that the city will be required to adopt zoning that ensures buildable land in the urban area, including land added to the UGB, cannot develop at an average overall density less than the applicable “safe harbor” Required Overall Minimum density of 5 units/acre. It appears Molalla’s current residential density standards may already achieve this minimum density, although the city would need to show the calculations to demonstrate this is the case, at the time of UGB expansion.

If that is not the desire of the city, you have the option of forecasting your future land needs by zone based on analysis of achieved densities in recent residential developments in each of your zones, instead of using the “safe harbor.”

Thank you for all you do!

Eric Vermillion
City Councilor
City of Molalla
(503) 309-1586



From: [Mike Simmons](#)
To: [Mac Corthell](#); [Christie Teets](#); [Dan Zinder](#); msimmons@hotmail.com
Subject: Re: Notes on updated HNA
Date: Tuesday, February 7, 2023 4:50:13 PM

Hello Mac, Christie, Dan,

I asked Jesse for a full professional review of the posted Draft HNA as attached.
I will print 9 copies and bring them with me for my 3 minutes on record tomorrow.

Hopefully you find this helpful, in short the recommendation is to:

1. Clearly State the Methodology used for BLI point by point, this section is confusing and some technical terms are being used as interchangeable and they are not.
2. Remove any consideration of housing in commercial lands. This is a risk to the City, is not normal and has not been done in other small nearby cities and is not a Safe Harbor path.
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Best Regards,
Mike Simmons

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Thank you! -Jesse

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Thank you,



Jesse Winterowd, AICP, PMP | Managing Principal

610 SW Alder St. | Suite 810 | Portland, OR, 97205

503.827.4422 ext. 109 | winterbrookplanning.com