

Exhibit B

Findings

Authority: This action is a Class “A” legislative Comprehensive Plan Amendment. The Planning Commission is authorized to recommend, and the City Council to approve, amendments to the Comprehensive Plan under Medford Municipal Code, sections 10.102, 10.110, 10.111, 10.122, 10.164, and 10.180.

Review Criteria: Medford Municipal Code §10.184(1) refers to the Urbanization Element of the Comprehensive Plan for Urban Growth Boundary Amendments. This Urban Growth Boundary Amendment consists of two parts: the map amendments and the text amendments. Since both portions are parts of the combined Urban Growth Boundary Amendment the following findings will apply to both the map changes (boundary adjustment/GLUP map/Street Functional Classification Map) and the text amendments (Comprehensive Plan text).

**Revision.
Draft 02.**

Key

New

~~Deleted~~

Moved to here

~~Moved from here~~

APPROVAL CRITERIA COMPLIANCE

Approval criteria for Urban Growth Boundary Amendments found in Section 1.2.3 of the Urbanization Element of the Comprehensive Plan

1.2.3 Approval Criteria

The City will base its decision for both major and minor amendments on:

- a. The standards and criteria in Goal 14¹, OAR 660, Division 24, and other applicable State Goals, Statutes, and Rules.*
- b. Compliance with Medford Comprehensive Plan policies and development code procedures.*
- c. Compliance with Jackson County’s development ordinance standards for urban growth boundary amendment. Many of the findings made to satisfy subparagraph (a), preceding, will also satisfy this criterion.*
- d. Consistency with pertinent terms and requirements of the current Urban Growth Management Agreement between the City and Jackson County.*

¹ Goal 14 identifies two components for amending a UGB: Land Need and Boundary Location. It also provides details on what should be considered for each of the two components. Goal 14 is divided into its two parts in the Findings below with the specific language from the goal provided in italics.

* * * * *

Urban Growth Boundary amendment approval criteria from Urbanization Element, Section 1.2.3

Criterion a. The standards and criteria in Goal 14, OAR 660, Division 24, and other applicable State Goals, Statutes, and Rules.

Goal 14 – Land Need

Establishment and change of urban growth boundaries shall be based on the following:

- 1. Demonstrated need to accommodate long-range urban population, consistent with a 20-year population forecast coordinated with affected local governments; and*
- 2. Demonstrated need for housing, employment opportunities, livability or uses such as public facilities, streets and roads, schools, parks or open space, or any combination of the need categories in this subsection (2).*

In determining need, a local government may specify characteristics, such as parcel size, topography or proximity, necessary for land to be suitable for an identified need.

Prior to expanding an urban growth boundary, local governments shall demonstrate that land needs cannot reasonably be accommodated on land already inside the urban growth boundary.

Findings

The process of determining Medford’s land need for the next 20 years started with the adoption of the Population Element in 2007. This study looked at the forecasted population growth in Medford through 2040. The next step was the Buildable Lands Inventory (BLI), adopted in 2008, consistent with OAR 660-024-0050 and ORS 197.186 and 197.296. This study identified the number of acres, in total and by type, available for development within the City’s current UGB. The BLI showed that there are approximately 2,592 gross residential acres² and approximately 1,078 gross employment acres³ available for development within Medford’s UGB. See Appendix A for more information regarding land supply.

The next step was the Economic Element, adopted in 2008, which considered the projected population growth, along with economic trends, to determine the overall need for employment land over the 20-year planning period. The study concluded that an additional 708 gross acres were needed to meet the demand for employment land. How-

² From Housing Element *Table 30*

³ From Economic Element *Figure 28*

ever, as shown in Appendix B, this does not properly account for the excess supply of industrial land available within the existing UGB. When properly calculated (see Appendix B) the need for employment land increases to 765 gross acres.

The next step was the Housing Element, adopted in 2010, which considered the projected population growth, along with housing trends, to determine the overall need for residential land over the 20-year planning period. The study concluded that an additional 996 gross acres⁴ were needed to meet the demand for housing and public and semi-public uses.

The Housing Element also projected future needs for public and semi-public uses. OAR 660-024-0040 (10) allows for a “safe harbor” net-to-gross factor of 25% for streets and roads, parks and school facilities. Rather than use the safe harbor amount the Housing Element calculates the net-to-gross factor for streets based on observations of the existing residential areas in the city. According to page 57 of the Housing Element “...the forecast shows land need in net acres. Net acres is the amount of land needed for housing, not including public infrastructure (e.g. roads). Gross acres is the estimated amount of land needed for housing inclusive of public infrastructure. The net-to-gross factor allows for conversion between net acres to gross acres. The net-to-gross factor is highest (23%) for single-family detached dwellings, decreasing to 10% for multi-unit projects.” Parks and schools were not considered in the net-to-gross factor, but rather, were included in the Other Residential Land Needs portion of the Housing Element, which concluded that 153 acres of park land and 20 acres of school land were needed in the UGB expansion area (see *Table 1.1*). The Other Residential Land Needs section of the Housing Element examines existing conditions for public and semi-public land to forecast future need for this land type.

According to the Housing Element:

Lands needed for public operations and facilities include lands for city facilities, schools, substations, and other public facilities. Land needs were estimated using acres per 1,000 persons for all lands of these types. Lands needed for parks and open space estimates use a parkland standard of 4.3 acres per 1,000 persons based on the level of service standard established in the Medford Leisure Services Plan Update (2006). This update includes land needed for neighborhood and community parks, which usually locate in residential plan designations. It does not include land needed for natural open space and greenways, which may also be located in residential plan designations (Housing Element, page 62).

Table 1.1. Public and Semi-public Land Need (Housing Element Table 40)

⁴ From Housing Element Table 41

Type of Use	Existing Acres	Acres per 1000 Persons	Assumed Need (ac/1000 Persons)	Estimated Need per 1000 Persons 2009–2034	Planned un-built supply in existing UGB
City	113	1.5	1.5	64	
City Parks	527	6.8	4.3	153	19
County	36	0.5	0.5	17	
State	47	0.6	0.6	22	
Federal	26	0.3	0.3	12	
Other public agency	43	0.6	0.6	20	
Schools	265	3.4	0.6	20	26
Church	159	2.1	2.1	73	
Fraternal	96	1.2	1.2	44	
Private Parks/Recreation					-43.7
Total	1,313	17.0	11.6	425	1.3
Net Needed for UGB					426

A letter submitted into the record by Greg Holmes of 1000 Friends of Oregon, dated March 3, 2015 (~~included as~~ Appendix C), challenges some of the City’s land need assumptions. Of the various charges of land excess in the letter, the City finds that un-buildable lands and the land need for rights-of-way, parks, and schools were correctly calculated. ~~However, the City agrees~~ [Staff and the Planning Commission at the time agreed](#) that the private park land need was erroneously included, and that the government land need was double-counted; respectively, 18 acres and 135 acres ~~should be~~ [were removed for the Planning Commission’s recommendation to Council](#). ~~Further analysis is provided in the May 6, 2015 staff memorandum titled “Evaluation of excessive land need arguments” which is included as Appendix D.~~

[Council finds that there is no need to remove land: the Housing Element was a post-acknowledgement plan amendment \(PAPA\) that was correctly adopted by the City and was not appealed by the Department of Land Conservation and Development in the time allowed under ORS 197.625... \[This is a legal argument that the attorney will flesh out\]. ...Therefore, the land need remains as stated at the beginning of the UGBA amendment process in March 2015 \(see Tables 1.3 and 1.4, below\).](#)

In addition to the standard urban reserve areas the Regional Plan Element identifies two large regional park areas, MD-P Prescott and MD-P Chrissy, which contain Prescott Park and Chrissy Park, respectively. These areas are City-owned wildland parks totaling 1,877 acres. Inclusion as urban reserve was intended to serve as a mechanism to eventually incorporate this City property into the City boundary to allow the City to have jurisdiction of the parks. The two MD-P areas were not considered areas for future urban growth because of their classification as parkland. There is no residential, commercial, or industrial development planned for the MD-P acres. They present a tremendous rec-

reational and open space asset to the City and the region, in addition to creating a buffer between the city and rural lands to the north and east. However, due to their location along the eastern periphery of the city and very steep topography, these lands satisfy little of the localized open space needs throughout the city and do not meet land needs for traditional urban parkland.

Through the studies adopted into the respective elements of the Comprehensive Plan, the City of Medford demonstrated a deficit in the supply of land within its existing UGB, for all types of uses, over the next 20 years. ORS 197.296 (6) recommends addressing the need by expanding the urban growth boundary, by increasing the developable capacity of the urban area, or by a combination of the two. UGBA Phase 1 (ISA GLUP Amendment) sought to change the General Land Use Plan designation of land in the existing urban area for the purpose of increasing its development capacity in order to accommodate some of the City's projected need for residential and employment land. See Appendix E for more information regarding UGBA Phase 1's effect on land supply. UGBA Phase 1 resulted in more efficient use within the UGB in the following ways:

- It took surplus industrial land (land in excess of the need for the next 20 years) and converted it to commercial land. This resulted in the accommodation of a larger portion of the employment need within the existing UGB;
- The conversion of industrial to commercial also helped to increase the likelihood of both commercial and industrial development over the next 20 years by placing these uses in more appropriate locations. There is strong development pressure for commercial uses on the industrial land nearer the center of the city, near major transportation routes. This pressure makes the land less likely to develop with industrial use. The swapping of land types places commercial designations on tracts of land nearer the center of the city while allowing the City to designate more land near the outside of the urban area, and still near major transportation routes, for industrial development;
- The City was able to shift some of the residential density called for in the Housing Element, and required by the Regional Plan, to the inside of the urban area. By shifting density inward the City is providing for a more efficient use of land and of public infrastructure;
- While UGBA Phase 1 resulted in a 58-acre conversion of land from residential to employment GLUP designations, the total residential land need only increased by 36 acres;
- The conversion of some residential land to employment land decreased the overall land need due to the fact that some of this land was not identified as meeting any portion of the future residential land need because it was classified as developed for residential. Because this land is expected to redevelop with commercial uses it is now being counted toward meeting a portion of the employment land need; and
- The shifting of density inward allows for a more efficient use of land within the city now, rather than relying on redevelopment to higher densities in the future. This also helps to provide opportunities for increased densities in the UGB ex-

pansion area because a larger percentage of the forecasted population over the next 20 years can be accommodated within the existing boundary. This could result in a slower expansion into the newly added areas, which would allow for policy changes in the future should the market shift toward higher density development. The density shift also helps to meet the obligations of the Regional Transportation Plan.

UGBA Phase 1 resulted in a decreased land need for the City. Before these intensification measures, a total of 1,761 gross acres were needed outside of the existing UGB. After UGBA Phase 1, a total of 1,669 gross acres are needed, a reduction of 92 acres. ~~After the necessary removal of 153 acres from the public and semi-public land, based on challenges received (see page 4), the total is decreased to 1,516 acres.~~

In 2012 the City, together with five other cities in the valley, adopted a Regional Plan for accommodating a doubling of the region's population. Regional Plan Element 4.1.5 requires a minimum density of 6.6 units per gross acre for all newly annexed areas for the years 2010 through 2035. The aggregate average density of the residential land need, determined by the Housing Element (see Appendix B, *Table 3.2*), was 6.9 units per gross acre (see *Table 1.2*. below). Some of this density was then shifted into the existing UGB through UGBA Phase 1. This density shift resulted in an increased need for UR (Urban Low-Density Residential) and a decreased need for UM (Urban Medium-Density Residential) and UH (Urban High-Density Residential) in the expanded UGB. While this density shift helped to accomplish a number of positive benefits it also makes meeting the minimum density requirement of the Regional Plan more difficult. With the revised ratios of residential land types in the UGB expansion area the average densities for each of the residential land types alone will not result in a density of 6.6 units per acre or above.

Table 1.2. Average Density from Housing Element (See Appendix B)

	Acres	Density	Total DU
UR	465	4.8	2,233
UM	39	12.8	498
UH	66	18.1	1,185
Total	570		3,916
Density			6.9 dwelling units/acre

The Housing Element (2010) provides an accurate representation of the City's housing need over the next 20 years. The Regional Plan (2012) imposes a density standard that is in excess of the density supported by the Housing Element now that the efficiency measures of UGBA Phase 1 are completed. In addition, the Regional Plan requires a density of 7.6 units per gross acre for all newly added areas for the years 2036 to 2050. In order to reconcile the two the City will require an urbanization plan to be submitted, showing compliance with the Regional Plan obligations for density and land use distribution, prior to annexation for any of the land added through this UGB amendment process. Acceptable methods for meeting the density standards will include:

- Committing areas to higher-density zones within a General Land Use Plan (GLUP) designation. For example, an area within the UR GLUP designation could be designated as SFR-10 (Single-Family Residential – 10 units per acre) which would insure a minimum density of 6 units per acre. By establishing “pre-zoning” within the established GLUP designations the residential density for the area can be moved higher than the minimum, or even average, density that the GLUP could accomplish; and/or
- Requesting GLUP map changes as part of the urbanization plan approval process. This will allow for additional areas for medium-density and high-density development within the areas added to the UGB. This technique will allow for more flexibility in meeting the density obligations of the Regional Plan without imposing a housing mix that is not consistent with the Housing Element. This will allow for flexibility in housing types as the market shifts toward higher-density housing while also setting the stage for the future density standard of 7.6 units per gross acre required by the Regional Plan. This approach will also help to address the affordable housing need identified in the Housing Element. By adding additional high-density housing throughout the UGB (in the existing UGB through the SALs and in the newly added areas by allowing for GLUP changes to higher density), the City is providing for more high-density housing, which is needed to provide more affordable housing within Medford, a need identified in the Housing Element but not subsequently addressed.

These required urbanization plans are expected to build on the conceptual plans required by the Regional Plan that also formed the basis of the GLUP designations for the areas added to the UGB.

Conclusions

UGBA Phase 1 (the SALs) converted surplus industrial land to commercial land which allowed for more of Medford’s need for employment land to be accommodated within its existing UGB. The conversion also resulted in the increased likelihood of a larger amount of Medford’s employment land need being met within the existing UGB by more appropriately locating both commercial and industrial land. While these adopted efficiency measures helped to address a portion of the City’s employment land need, an additional 637 gross acres of employment land outside of the existing UGB are needed. The employment land portion of the proposed UGB expansion, shown in Table 1.3 below, will allow the City to meet its identified need for employment land.

Table 1.3. Employment Land Need in Gross Acres

<u>Plan Designation</u>	<u>Need</u>	<u>Plan Description</u>
SC	222	Service Commercial: office, services, medical
GI & HI	97	General & Heavy Industrial: manufacturing
CM	318	Commercial: retail, services
<u>Total Employment</u>	<u>637</u>	

The Housing Element provides for an adequate land supply at a realistic housing mix for the planning horizon. In addition to land for housing, the Element accounts for land needed for streets and other utilities, and for public and semi-public uses, which usually occur on residentially zoned properties. The residential density requirements of the Regional Plan were added to the Comprehensive Plan after the adoption of the Housing Element and the two do not agree. By requiring urbanization plans for all of the areas being added to the UGB prior to annexation, the City can reconcile the Housing Element with the Regional Plan and can insure that the residential density standards are being met. The required urbanization plans must demonstrate compliance with the minimum density standards and with the land use distributions required by the Regional Plan.

Goal 10 requires that “plans shall encourage the availability of adequate numbers of needed housing units at price ranges and rent levels which are commensurate with the financial capabilities of Oregon households and allow for flexibility of housing location, type, and density.” By allowing for some residential areas to be up-GLUPed (from a lower-density residential GLUP to a higher-density residential GLUP) the City is providing for more flexibility of housing types in the UGB expansion areas while also helping to increase the supply of higher-density housing, which is needed to meet the demand for low-income housing in the City.

The “Other Residential Land Needs” of the Housing Element identified a need for 153 gross acres of additional parkland for neighborhood and community parks outside of the existing UGB. The Regional Plan Element also includes two large wildland park areas that are owned by the City. These areas, Chrissy and Prescott parks, are intended to provide for both recreational and open space opportunities for the City and for the region. While both help to meet the recreational needs for the City these are two different land types (neighborhood and community park vs. regional/wildland park and open space) that provide two discreet types of uses for the City.

After adopting the efficiency measures from UGBA Phase 1 the City needs 1,032 gross acres of land outside of the existing UGB to meet its needs for residential and public and semi-public land. ~~With the changes to the Public and Semi-Public land need (18 acres for erroneously counting private open space and 135 acres for the double counting government uses) this total is changed from 426 acres to 273 acres, which reduces the residential land need from 1,032 gross acres to 879 gross acres.~~ The public and semi-public land was allocated to the three residential land types based on the percentage of dwelling units needed for each type and will be removed in the same way to adjust for the revised land need. The residential land portion of the proposed UGB expansion, shown in table 1.4 below, will allow the City to meet its identified need for these land types.

~~Table 1.3. Employment Land Need in Gross Acres~~

Plan Designation	Need	Plan Description
SC	222	Service Commercial: office, services, medical
GI & HI	97	General & Heavy Industrial: manufacturing

CM	318	Commercial: retail, services
Total Employment	637	

Table 1.4. Residential Land Need in Gross Acres

Plan Designation	Need	Plan Description
UR	778 <u>885</u>	Low-density Residential, 4–10 units/acre
UM	1727	Medium-density Residential, 10–15 units/acre
UH	84 <u>120</u>	High-density Residential, 15–30 units/acre
Total Residential	8791 <u>032</u>	

* * * * *

Goal 14 – Boundary Location

The location of the urban growth boundary and changes to the boundary shall be determined by evaluating alternative boundary locations consistent with ORS 197.298 and with consideration of the following factors:

1. *Efficient accommodation of identified land needs;*

Findings

Per ORS 197.298, once a City has demonstrated a need to expand its UGB, the first priority of land for inclusion is land designated as urban reserve. No other type of lower-priority land should be considered for inclusion unless the land need exceeds the supply of land within the urban reserve. In this case, Medford’s urban reserve provides for a roughly 50-year supply of land. The land the City has available to select from is all first-priority land. All of this land has been identified for future urbanization and the work of determining suitability was done in the creation of the urban reserve, consistent with ORS 195.137–145.

The City has an identified land need of ~~1,516~~1,669 acres and an urban reserve of 4,488 acres (excluding the two wildland park areas) from which to choose. While the 4,488 acres includes both buildable and non-buildable acres, the total far exceeds the ~~1,516~~1,669 buildable acres needed for the 20-year planning period. In order to determine where the City could most efficiently meet its land needs for the next 20 years a “coarse filter” was used. The coarse filter, which considered proximity and parcel size as indicators of efficiency for development, helped to refine the area of consideration prior to completing a capacity analysis (to determine the number of buildable acres) and comparing urban reserve areas on a more detailed level.

One of the best indicators for suitability for the first 20-year supply is proximity. Basic principles of urban planning dictate that growth will occur from the center out in order to avoid “leap-frog” development which leads to inefficient use of land and difficult and costly extensions of infrastructure. The results of the proximity analysis are shown on *Map 5.1* in Appendix F.

The next criterion used in the coarse filter portion of the analysis is parcelization. Staff mapped parcel size in order to determine the amount of parcelization in each of the urban reserve areas. The results of the parcel size analysis are shown on *Map 5.2* in Appendix F. The City is obligated to provide a 20-year supply of land for residential and economic development but is not allowed to offer anything more than a 20-year supply. Because of this obligation, and this constraint, it is imperative that the City select land that is available for development over the next 20 years. The development of larger tracts of land tends to have a higher return on investment than the development/redevelopment of smaller tracts of land. In addition, the land use structure in Oregon has created a premium on rural residential acreage near the city limits. Because “rural” living close to town is both desirable to many, and is getting harder to come by, people who own these properties have little incentive to develop the properties to urban density standards. Once urban development extends to, and encroaches upon, these smaller parcels, the land becomes more developable both because it makes greater economic sense (utilities more readily available, and higher land value/larger demand) and because the property loses its rural feel.

The results of the coarse filter are shown on *Map 6.1* in Appendix G. A brief discussion of why certain portions of the urban reserve were eliminated through the coarse filter process is provided below.

The middle portion of MD-1 and the southeast corner of MD-5 were eliminated from further consideration because they scored poorly on both proximity and parcelization. The remainder of MD-1, the north portion of MD-2, the northeast corner of MD-3, MD-3 east of Foothill Rd, and all of MD-6, MD-7, MD-8, and MD-9 had marginal composite scores for proximity and parcelization. With the exception of a portion of MD-6, the urban reserve areas on the west side of interstate 5 (MD-6, MD-7, MD-8, & MD-9) were retained for further consideration in order to maintain a balance of ESAs around the existing UGB. The balanced distribution around the existing UGB was considered important for a number of factors, including:

- Distribution around the UGB worked as an additional filter in the selection of parcels near existing development. Since urban development extends to, or near, the existing UGB in most places, selecting a group of parcels spread out around the UGB to the fullest extent possible places these parcels closer to existing urban development. Selecting parcels all within large groups (all of MD-5 for example) would have the effect of including parcels that are further away from existing development.
- The selection of land distributed around the entire UGB adds diversity to the supply of land. This adds choice in development type, price point, and so on.
- Distributing parcels around the existing UGB helps to spread the burden of providing services to new development. Placing all new development in a smaller number of areas would have the effect of overburdening the systems for water, sewer, transportation, etc. By providing for a larger geographic distribution for

future development the City can allow for the increased demand on the existing systems to be distributed throughout the systems.

The east portion of MD-1 was retained for further consideration because of its proximity to the existing Highway 62 route and the future Highway 62 route. The west portion of MD-1, the northeast corner of MD-2, the northeast corner of MD-3, and MD-3 east of Foothill Rd were eliminated from consideration because they all have marginal composite scores for proximity and parcelization and they do not serve to improve the transportation system by providing connections for highways or higher-order streets.

Conclusions

The City only considered first-priority land (land within the urban reserve) for inclusion per ORS 197.298. Since there is more than enough land within the urban reserve to meet the land need over the next 20 years, no lower-priority land was considered for inclusion. The City needed to select land to meet the need for the next 20 years from the available 50-year supply within the urban reserve. The purpose of the coarse filter was to select land that could most efficiently accommodate the City's identified land need. Proximity and parcelization were used as indicators of efficiency for development. Proximity helps to indicate current and short-term pressure for development as well as efficiency for the extension of services. Parcelization is also an indicator of both availability for development and the ability to develop an area in an efficient, coordinated way.

2. Orderly and economic provision of public facilities and services;

Findings

The External Study Areas (ESAs) were made up of the properties that passed through the coarse filter. Since the "efficient accommodation of identified land needs" is set as the first priority, any area that did not meet the measure for efficiency (the coarse filter) was eliminated from further consideration prior to further study on the ESAs. Once the ESAs were identified a capacity analysis was conducted (*Map 6.2, Appendix G*) similar to the Buildable Lands Inventory following the procedures of OAR 660-024-0050 and ORS 197.186 and 197.296 in determining buildable lands. Additional data were then collected for the ESAs regarding the serviceability for water, sewer, and transportation. This was done to measure the ability to provide public facilities and services in an orderly and economic fashion. Maps of the additional scoring results can be found in Appendix H and the scoring memos provided by the service providers are attached as Appendix I.

In the case of transportation there are major system improvements needed regardless of where the boundary is expanded. Some areas had a greater negative effect on the system than others based on existing infrastructure, network connections, and traffic patterns. Further explanation of how the transportation scoring memo from Kittelson and Associates was applied to the transportation scoring map (*Map 7.1, Appendix H*)

was originally provided in the record as Exhibit D of the April 6, 2015 Planning Commission study session agenda. This memo has been included as Appendix J.

The scoring for water serviceability came from staff at the Medford Water Commission. The scoring memo they provided was very thorough and detailed and made for easy conversion to Planning staff's scoring map (*Map 7.2*, Appendix H). There were two requests to change the water scoring map received by Planning after the map was made public at the October 2014 open house. The Medford Water Commission reviewed the requests and ultimately decided that the scores that were provided originally were consistent with the scoring methodology used for all of the ESAs and that those scores appropriately represented the comparative ease/difficulty of providing service based on current conditions. Their response to those requests is included with the scoring memos in Appendix I.

The scoring of sewer serviceability was a little different because there are two service providers within the Urban Reserve. The comments received initially from the two providers were very different, which made comparative scoring difficult. Planning staff took those comments and attempted to rank all of the ESAs (both City and RVS service areas) based on those comments alone. Once Planning staff had a map done a meeting was held with the representatives from the City and RVS who provided the initial comments.

Planning staff and the representatives from both sewer service providers discussed the draft scoring map and found that Planning's scoring was off in many areas. In general RVS viewed all areas within the ESAs as either easy or relatively easy to serve. Even the need for additional pump stations was viewed as a minor part of the standard operations of the district. Conversely, the City of Medford sewer system is in need of major system upgrades that for the most part are not currently funded. Any additional demand on the system, regardless of where it is placed within the ESAs, will require additional investment to improve downstream capacity. Some areas were worse than others and so they were ranked from poor to moderate based on input from the City sewer representative. Both sewer representatives were satisfied with the new map (*Map 7.3*, Appendix H) before the meeting was over. The information obtained from the two services providers is the most accurate, up-to-date information available for our analysis. The ability for the two providers to discuss their system operations and needs in the same room provided the comparative analysis across both systems in all portions of the ESAs.

Policy differences between the two service providers were used in the analysis and helped to determine scores for the whole area. The willingness to use pump stations to provide service to an area is a good example in policy differences: RVS is much more willing to use pump stations in its system than the City of Medford is.

The results of the scoring for all five factors—proximity, parcelization, water, sewer, and transportation—were used to guide the decision on where to expand the City's UGB. In addition to the scoring of the properties for the five factors, the City also had to consid-

er the obligations of the Regional Plan Element. The Regional Plan requires the City to collaborate with the Rogue Valley Metropolitan Planning Organization, applicable irrigation districts, Jackson County, and other affected agencies to produce a conceptual land use plan for the area proposed to be added to the UGB. The conceptual land use plan must be used to demonstrate how the City is meeting targets for density, land use distribution, transportation infrastructure, and mixed-use/pedestrian-friendly areas. The City's conceptual plans for the urban reserve are provided as Appendix K. The scored properties were not ranked on a parcel-by-parcel basis, but rather, areas were selected based on their scores for the five factors and based on the area's ability to meet Regional Plan obligations. The mix of land uses in the area was an important consideration regarding the orderly and economic provision of public facilities and services.

In developing the three alternatives, staff considered all areas included in the original recommendation. The portions of MD-2 included in the [staff](#) recommendation were not removed in any of the alternatives because MD-2 provides for the kinds of regional commercial development that can serve, and be supported by, users outside of the immediate area. This is due in large part to MD-2's location along Highway 62.

The future South Valley Employment Center (identified in the Regional Problem Solving process) is contained within the portions of MD-5 originally recommended for inclusion. This area is needed for future economic development in the city and in the region. The South Valley Employment Center is a great fit for a large portion of the identified employment land need. The inclusion of the lower-density residential property to the north of the South Valley Employment Center provides connections between the employment area and existing urban development to the north. The lower-density residential area contains the approximately 120-acre Centennial Golf Club. The golf course is provisionally countable as unbuildable and does not count against the City's supply of developable residential land. The portions of MD-5 east of North Phoenix Road and south of Coal Mine Road help to provide for a portion of the employment land need while also providing for high and medium-density residential development adjacent to a future elementary school. For these reasons, no portion of the originally recommended MD-5 was recommended for removal.

Staff also considered removing areas along the southwest fringe, ultimately deciding against it for the following reasons. These areas, [Areas](#) MD-7, MD-8, and MD-9, are well suited to provide the kinds of mixed-use/walkable neighborhoods required by the Regional Plan and to help provide needed affordable housing. The relatively close proximity of these areas to the city core, the fact that much of this area is relatively flat, and the existing network of gridded streets increase the likelihood of well integrated mixed-use/walkable neighborhoods developing in these locations. The Housing Element identified a large need for affordable housing but it did not identify a solution for meeting the need. These portions of the urban reserve can help to meet the need for affordable housing by providing land with relatively low development costs. These areas are fairly flat, they are well connected to existing development, and they score well on serviceability for water, sewer, and transportation compared to other areas.

Originally staff had recommended the inclusion of all of MD-4 and another large section of MD-3 based on the identified land need from the Comprehensive Plan. [After the 1000 Friends letter \(Appendix C\) prompted staff and the Planning Commission to remove](#) ~~Once it was determined that 175 acres needed to be removed from the land need map,~~ staff [devised three alternatives for the Commission to choose. The Commission ultimately combined two of the options that removed the western half of MD-3 and the northern two thirds of MD-4 plus added land in western MD-5. The Council decision reverses some of those recommendations, such as adding land at the eastern end of MD-5 because they are essential to achieving goals deemed a priority for the City; specifically, critical bike path connections from eastside park land that will connect to the regional greenway.](#) ~~was tasked with creating alternative recommendations for the revised land need. Staff's alternatives were originally presented in a May 5, 2015 staff memorandum regarding the UGB Amendment Project, for the May 14, 2015 Planning Commission meeting. This memo is included as Appendix L.~~

~~All of the acreage to be removed had to come from the residential land types, primarily from the lower density residential supply. With the exception of a few areas that have been designated exclusively for employment uses, most of the proposed UGB expansion areas include a mix of uses. There is a need for large amounts of employment land designations because the City adopted the "high growth" scenario in its Economic Element. It was a challenge to find suitable locations for all of the employment land within the UGB expansion areas and that challenge was amplified by the revised land need. Non-regional commercial development needs nearby residential development to be viable. The removal of approximately 175 acres of residential land needed to be done in a way that did not leave commercial land in areas that are not likely to be used~~

~~In developing the three alternatives, staff considered all areas included in the original recommendation. The portions of MD-2 included in the recommendation were not removed in any of the alternatives because MD-2 provides for the kinds of regional commercial development that can serve, and be supported by, users outside of the immediate area. This is due in large part to MD-2's location along Highway 62.~~

~~The future South Valley Employment Center (identified in the Regional Problem Solving process) is contained within the portions of MD-5 originally recommended for inclusion. This area is needed for future economic development in the city and in the region. The South Valley Employment Center is a great fit for a large portion of the identified employment land need. The inclusion of the lower density residential property to the north of the South Valley Employment Center provides connections between the employment area and existing urban development to the north. The lower density residential area contains the approximately 120-acre Centennial Golf Club. The golf course is provisionally countable as unbuildable and does not count against the City's supply of developable residential land. The portions of MD-5 east of North Phoenix Road and south of Coal Mine Road help to provide for a portion of the employment land need while also providing for high and medium density residential development adjacent to a future elemen~~

~~tary school. For those reasons, no portion of the originally recommended MD-5 was recommended for removal.~~

~~Staff also considered removing areas along the southwest fringe, ultimately deciding against it for the following reasons. These areas, MD-7, MD-8, and MD-9, are well suited to provide the kinds of mixed use/walkable neighborhoods required by the Regional Plan and to help provide needed affordable housing. The relatively close proximity of these areas to the city core, the fact that much of this area is relatively flat, and the existing network of gridded streets increase the likelihood of well-integrated mixed-use/walkable neighborhoods developing in these locations. The Housing Element identified a large need for affordable housing but it did not identify a solution for meeting the need. These portions of the urban reserve can help to meet the need for affordable housing by providing land with relatively low development costs. These areas are fairly flat, they are well connected to existing development, and they score well on serviceability for water, sewer, and transportation compared to other areas.~~

~~At their May 14, 2015 meeting the Planning Commission chose staff's Alternative 1, to remove a portion of MD-4, and staff's Alternative 2, to remove a portion of MD-3 from staff's original recommendation in order to account for the revised land need and to allow for the inclusion of a portion of MD-5.~~ This portion of MD-5, generally located south of Cherry Lane, north of Barnett Road, and east of the existing UGB, was not included in staff's recommendation because it did not score as well on the orderly and economic provision of public facilities and services as some of the other portions of the urban reserve. As will be discussed in detail below, the Planning Commission determined that the comparative environmental, social, economic, and energy (ESEE) consequences between this particular portion of MD-5 and the applicable portions of MD-4 and MD-3 were strongly enough in favor of MD-5 to offset its lower relative score for public facilities and services.

[Council declined the Planning Commission's recommendation on removing the land suggested by the 1000 Friends letter \(Exhibit C\) and considered four options for restoration, the fourth of which was submitted by a private party. Council selected the fourth option, which restored much of MD-4, part of western MD-3, and extended what would be included in eastern MD-5.](#)

Conclusions

By using the scores of the five factors, and considering an area's ability to meet the City's projected need by GLUP designation, and the Regional Plan obligations, rather than comparing properties on a parcel-by-parcel basis, the City proposes to expand its UGB in a way that will provide for the orderly and economic provision of public facilities and services.

~~Alternative recommendations regarding where to remove 175 acres of land from staff's original recommendation were formulated based on the need to appropriately distribute employment and residential land types. The orderly and economic provision of pub-~~

~~lic facilities and services depends, in part, on the orderly development of lands included in the UGB. If commercial land is placed in a location where commercial development is not expected to be viable, then that land cannot reasonably be expected to develop.~~

In choosing to include a portion of MD-5 that did not score as well as some other portions of the urban reserve for the orderly and economic provision of public facilities and services—because the comparative environmental, social, economic, and energy (ESEE) consequences for that portion of MD-5 offset its lower relative score for public facilities and services—the Planning Commission [and City Council](#) recognized the need to balance all of the boundary locational factors in determining the final location of the UGB.

[Whether it is providing areas for aging in place to accommodate the anticipated doubling of the City's elderly population, or resolving existing enclave issues, each area to be included in the boundary expansion has particular value for the City of Medford.](#)

3. Comparative environmental, social, economic, and energy (ESEE) consequences;

Findings—Environmental

One of the components of the coarse filter was proximity. Selecting parcels closer to the existing UGB not only helps to maximize the efficiency of public infrastructure, it helps the environment by reducing motor vehicle trips⁵. A more compact urban area with mixed-use neighborhoods⁶ helps to promote the development and use of transit⁷. Density and distance both play key roles in developing and maintaining public transit options⁸. A more compact urban area with mixed-use neighborhoods also provides greater opportunities to invest in facilities for pedestrians and bicyclists, while at the same time making walking and biking more viable transportation options. The more compact urban area with mixed-use neighborhoods helps to reduce the amount of pollution caused by motor vehicle traffic by reducing the number of motor vehicle miles traveled; both by providing alternative modes of transportation and by reducing the distance traveled between home, work, shopping, recreation, and so forth.

The selecting of parcels close in to the existing UGB also allows for the continued rural use of the properties nearer the edge of the urban reserve. Unused properties in the outer fringe of the urban reserve also help to benefit the City and the environment by acting as a buffer between urban uses and rural uses and/or natural areas. In contrast, selecting properties nearer the outside edge of the urban reserve would have the effect of disrupting the use of those properties and of the properties closer to the existing UGB. By reducing the impact on the urban reserve areas not being proposed for inclu-

⁵ For reference on pollution from automobiles see «http://www.ucsusa.org/clean_vehicles/why-clean-cars/air-pollution-and-health/cars-trucks-air-pollution.html#.Vld3NNpOWUk»

⁶ The Regional Plan requires the development of mixed-use/pedestrian-friendly areas.

⁷ For reference on the benefits of mixed-use development see «<http://www.mrsc.org/subjects/planning/mixeduse.aspx>»

⁸ For reference on the benefits of transit see «<http://www.usnews.com/news/articles/2011/02/11/public-transportation-key-to-transforming-communities>»

sion, the City is limiting the amount of displacement of rural uses in the urban reserve, thus minimizing the impact on lands outside of it.

The City has regulations in place to guide the development and/or protection of environmentally sensitive areas such as steep slopes and riparian corridors. These rules will be extended to areas added to the UGB once annexed to the City. The City must also adopt a revised Local Wetland Inventory (LWI) for the areas added to the UGB through this proposal. The LWI will identify wetlands and determine which have local significance. A wetland protection ordinance will then be adopted to protect locally significant wetlands from development. This work will be completed once the final boundary of the UGB is determined. The LWI and wetland protection regulations must both be adopted prior to the annexation of any of the areas added to the UGB through this amendment.

Conclusions—Environmental

Environmental impacts were a key consideration during the adoption of the urban reserve. Now that the urban reserve is in place and the City must select its future UGB from the urban reserve areas, the biggest environmental consideration is proximity. All of the urban reserve area will be added to the UGB and made available for urbanization eventually, but relative environmental impacts must be considered when determining which properties to include in the UGB at this time. The urbanization of any of this area will have some effect on the environment but the magnitude of the effect has been minimized by selecting parcels near the existing UGB. The environmental protection provisions in the City Code will be extended to the areas added to the UGB when annexed. Both the LWI and wetland protection regulations for these newly added areas must be adopted prior to the annexation of any of the areas.

Findings—Energy

The Regional Plan requires the development of mixed-use/pedestrian-friendly areas. This type of development encourages the use of travel modes other than driving, leading to a reduction in vehicle miles travelled. One of the components of the coarse filter was proximity. Selecting parcels closer to the existing UGB not only helps to maximize the efficiency of public infrastructure, it has the effect of reducing energy use by reducing motor vehicle trips. A more compact urban area, with mixed-use neighborhoods, helps to promote the development and use of transit. Density and distance both play key roles in developing and maintaining public transit options. A more compact urban area with mixed-use neighborhoods also provides greater opportunities to invest in facilities for pedestrians and bicyclists, while at the same time making walking and biking more viable transportation options. The more compact urban area with mixed-use neighborhoods help to reduce energy consumption by reducing the number of motor vehicle miles traveled, both by providing alternative modes of transportation and by reducing the distance traveled between home, work, shopping, recreation, and so forth.

The process of selecting where to expand the UGB included a consideration regarding where anticipated higher-order streets could be connected to other planned and exist-

ing higher-order streets based on areas added to the UGB. This process helped to identify where the inclusion of areas currently in the urban reserve could help to provide key urban services to properties currently within the UGB. Some areas, such as portions of MD-2, MD-3, and MD-5, provide the ability to connect higher-order streets and to create a grid pattern of streets that will help to spread traffic within the existing UGB in those areas. This distribution of traffic will help to relieve congestion on existing traffic infrastructure. Therefore these areas have a positive energy consequence through their inclusion in the UGB because of their ability to reduce congestion within the existing UGB.

The inclusion of a portion of MD-5 south of Cherry Lane, north of Barnett Road, and east of the current UGB was done in part to help facilitate the extension of the Larson Creek multi-use trail from North Phoenix Road, through current and future development, and into Chrissy and Prescott Parks. This property was also included, in part, because it plays a role in connecting portions of the existing UGB to sewer service and because it plays a role in connecting Barnett Road to Cherry Lane.

The availability of a dedicated multi-use path in the southeast portion of the urban area will help to reduce local trips in that area. Since the path will also tie into a larger network of trails, including the Larson Creek trail from North Phoenix Road to Bear Creek, and the Bear Creek Greenway trail, it will also allow for regional traffic via bicycle for those interested in traveling a greater distance by bike.

While all portions of the UGB and existing city limit can be served with sewer without the addition of lands to the UGB, the inclusion of this portion of MD-5 will allow for the best routing of sewer service in the area. This best route will have the benefit of eliminating the need for lift stations and will provide the lowest life-cycle cost for the sewer system in the area. The elimination of a lift station reduces the energy use in operating the sewer system and using the lowest-cost, longest-lasting alternative in extending the sewer facilities will also help to conserve energy.

This portion of MD-5 also plays a vital role in connecting Barnett Road to Cherry Lane. This connection will provide a more direct route from residential areas along Hillcrest Road and employment centers along Barnett Road. This same connection will also provide a more direct route from those residential areas to freeway access, northbound at the Garfield/Highland interchange and southbound at the Fern Valley interchange. This street connection helps to reduce the number of miles traveled by providing a more direct route. It also reduces energy consumption by reducing congestion and by providing additional route choices.

Conclusions—Energy

When considering where to expand the UGB, mixed-use development and proximity have the greatest impact on the use and/or conservation of energy. The fact that the needed houses and jobs would be efficiently contained in the current urban area and in areas close to the existing UGB would have generally positive energy consequences due

to the increased possibility of non-motorized travel modes between trip generators and decreasing overall “vehicle miles travelled” (VMT). Reid Ewing, a transportation planning researcher and professor at the University of Utah, “looked at all the available evidence and concluded that sprawling communities that require car trips to meet most daily needs exhibit 20–40% higher VMT than more compact, mixed-used, and walkable neighborhoods.”⁹ And as noted in an online edition of “The Atlantic” magazine¹⁰:

We [the US] continue to lead advanced economies in per-capita carbon emissions, 28 percent of which come from transportation. But even if the crunchy granola argument isn't good enough to make you see the benefits of public transit, consider that trains, trams, buses, and the like reduces traffic congestion, which is good for the life satisfaction of everybody behind the wheel, since science shows long commutes make us unhappy.¹¹

The inclusion of a portion of MD-5 south of Cherry Lane, north of Barnett Road, and east of the current UGB will help facilitate the extension of the Larson Creek multi-use trail from North Phoenix Road, through current and future development, and into Chrissy and Prescott Parks; connect portions of the existing UGB to sewer service along the lowest life-cycle cost route; and provide a route to connect Barnett Road to Cherry Lane. All of which will have positive impacts on energy use.

Findings—Economic

The City of Medford, as all cities in Oregon, continues to have a goal of providing land to accommodate its 20-year land need for housing and employment, as required under Oregon Revised Statute (ORS) 197.296. The City of Medford’s current UGB was adopted in 1990 and was expected to last through 2010. As demonstrated throughout this document, the City does not currently have a 20-year land supply and needs to meet the projected demand for employment and residential land over the 20-year planning period. ORS 197.296(6) recommends addressing the need by expanding the urban growth boundary, by increasing the developable capacity of the urban area, or by a combination of the two. UGBA Phase 1 sought to increase the development capacity of land within the existing UGB in order to accommodate some of the City’s projected need for residential and employment land. This phase, UGBA Phase 2 (External Study Area (ESA) Boundary Amendment), seeks to amend the City’s UGB and make more land available for urban development.

⁹ Excerpt from website «<http://streetswiki.wikispaces.com/Vehicle+Miles+Traveled>» (retrieved 2013-11-20), summarizing information from Ewing’s book titled *Growing Cooler: The Evidence on Urban Development and Climate Change*. Chicago: Urban Land Institute, 2007.

¹⁰ Excerpted from «<http://www.theatlantic.com/business/archive/2013/11/the-case-against-cars-in-1-utterly-entrancing-gif/281615/>» (retrieved 2013-11-20)

¹¹ For reference to commuting studies see «<http://www.economist.com/blogs/gulliver/2011/06/perils-commuting>»

UGBA Phase 1 had a number of positive effects on the developable capacity within the existing UGB. One of which, the conversion of industrial land to commercial land, helped to increase the likelihood of both commercial and industrial development over the next 20 years by placing these uses in more appropriate locations. There is strong development pressure on the industrial land in the city core, near major transportation routes, to be used for commercial uses. This pressure makes the land less likely to develop with industrial use. The swapping of land types places commercial designations on appropriate tracts of land within the city core while allowing the City to designate more land near the outside of the urban area, but still near major transportation routes, for industrial development. In choosing where to expand its UGB, the City of Medford considered the suitability of employment land for each of the employment types. For example, large tracts of General Industrial, Service Commercial, and Commercial land were selected between North Phoenix Road and Interstate 5, near the future overpass and connection with South Stage Road to the west. This area is planned for a future employment center for the City and for the region. In other cases smaller tracts of employment land were designated in residential areas in order to promote the development of mixed-use neighborhoods.

In addition to appropriately locating land types, the proposed UGB expansion will also have the effect of increasing the availability of all types of urban land. The increased supply of land should have the effect of spurring economic development and improving the local economy by reducing the cost of land. However, this will only be the case if the urbanizable land is held by a large enough number of owners to promote competition and protect against monopoly and price-fixing¹². Parcel size was one of the components of the coarse filter. It was used as an indicator of parcelization which was used to compare the relative availability of the land within the urban reserve for development. While it is important for the City to select land that is available for development, the selection of only large parcels of land would have the effect of concentrating the supply of land among a relatively small number of owners. By selecting some of the smaller parcels, primarily on the west side of Interstate 5, the City is effectively distributing the supply of developable land to a greater number of property owners.

The City also selected parcels distributed around the existing UGB for inclusion in the UGB expansion area. This was done in part to help provide variety in the locations and types of land available for development and to help distribute the impact of additional development throughout infrastructure systems.

The inclusion of a portion of MD-5 south of Cherry Lane, north of Barnett Road, and east of the current UGB was done in part because it plays a role in connecting portions of the existing UGB to sewer service. While all portions of the UGB and existing city limit can be served with sewer without the addition of lands to the UGB, the inclusion of this por-

¹² For reference on the effects of monopoly on the supply and demand curve see
«<http://www.cliffsnotes.com/more-subjects/economics/monopoly/demand-in-a-monopolistic-market>»

tion of MD-5 will allow for the best routing of sewer service in the area. This best route will have the benefit of eliminating the need for lift stations and will provide the lowest life-cycle cost for the sewer system in the area. Both have positive economic impacts.

Conclusions—Economic

UGBA Phase 1 had the effect of more appropriately locating employment land. Through careful consideration of the available land within the urban reserve, and the land need by employment type, the City has selected land to efficiently meet the employment need over the 20-year period.

The increased availability of all types of urbanizable land should have a positive effect on the local economy by decreasing the cost of developable land. This can only occur if the land is held by a large enough number of owners to promote competition. By selecting a mix of both large and small parcels the City will provide an adequate supply of developable land while helping to distribute the supply to a greater number of property owners.

Findings—Social

The wide-ranging factors that influence the social effect of the proposal will be discussed individually. There is some overlap between the social factors and the environmental, energy, and economic factors because many of the things that influence those scores—proximity, mixed-use development, and availability of developable land—also influence the social effect of the proposal.

Traffic: One of the components of the coarse filter was proximity. Selecting parcels closer to the existing UGB not only helps to maximize the efficiency of public infrastructure, it has the social benefit of reducing motor vehicle trips. A more compact urban area, with mixed-use neighborhoods, helps to promote both the development and use of transit. Density and distance both play key roles in developing and maintaining public transit options. A more compact urban area also provides greater opportunities to invest in facilities for pedestrians and bicyclists, while at the same time making walking and biking more viable transportation options. The more compact urban area helps to reduce the amount of motor vehicle traffic by reducing the number of motor vehicle miles traveled; both by providing alternative modes of transportation and by reducing the distance traveled between home, work, shopping, recreation, etc.

The inclusion of a portion of MD-5 south of Cherry Lane, north of Barnett Road, and east of the current UGB was done in part to help facilitate the extension of the Larson Creek multi-use trail from North Phoenix Road, through current and future development, and into Chrissy and Prescott Parks. This property was also included, in part, because it plays a role in connecting Barnett Road to Cherry Lane.

The availability of a dedicated multi-use path in the southeast portion of the urban area will help to reduce local trips in that area. Since the path will also tie into a larger net-

work of trails, including the Larson Creek trail from North Phoenix Road to Bear Creek, and the Bear Creek Greenway trail, it will also allow for regional traffic via bicycle for those interested in traveling a greater distance by bike.

This portion of MD-5 also plays a role in connecting Barnett Road to Cherry Lane. This connection will provide a more direct route from residential areas along Hillcrest Road and employment centers along Barnett Road. This same connection will also provide a more direct route from those residential areas to freeway access, northbound at the south Medford interchange and southbound at the Fern Valley interchange. This street connection helps to reduce traffic congestion by providing a more direct route for some travelers and by providing additional route choices.

Land Availability: In addition to appropriately locating land types the proposed UGB expansion will also have the effect of increasing the availability of all types of urban land. The increased supply of land should have the effect of spurring economic development and improving the local economy by reducing the cost of land. However, this will only be the case if the urbanizable land is held by a large enough number of owners to promote competition and protect against monopoly and price-fixing. Parcel size was one of the components of the coarse filter. It was used as an indicator of parcelization which was used to compare the relative availability of the land within the urban reserve for development. While it is important for the City to select land that is available for development the selection of only large parcels of land would have the effect of concentrating the supply among a relatively small number of owners. By selecting some of the smaller parcels, primarily west of Interstate 5, the City is effectively distributing the supply of developable land to a greater number of property owners.

Relative Cost of Development: The findings for the “Orderly and economic provision of public facilities and services,” above are pertinent here as well. Since the cost of development is oftentimes passed on to the consumer through increased costs, and to the general population through increased service rates and increased taxes, selecting properties with the lowest relative cost of development has a positive social effect.

The External Study Areas (ESAs) were made up of the properties that passed through the coarse filter. Since the “efficient accommodation of identified land needs” is set as the first priority, any area that did not meet the measure for efficiency (the coarse filter) was eliminated from further consideration prior to further study on the ESAs. Once the ESAs were identified a capacity analysis was conducted. Additional data were then collected for the ESAs regarding the serviceability for water, sewer, and transportation. This was done to measure the ability to provide public facilities and services in an orderly and economical fashion.

The results of the scoring for all five factors—proximity, parcelization, water, sewer, and transportation—were used to guide the decision on where to expand the City’s UGB. In addition to the scoring of the properties for the five factors the City also had to consider

the obligations of the Regional Plan Element, adopted in 2012. The Regional Plan requires the City to collaborate with the Rogue Valley Metropolitan Planning Organization, applicable irrigation districts, Jackson County, and other affected agencies to produce a conceptual land use plan for the area proposed to be added to the UGB. The conceptual land use plan must be used to demonstrate how the City is meeting targets for density, land use distribution, transportation infrastructure, and mixed-use/pedestrian-friendly areas. The scored properties were not ranked on a parcel-by-parcel basis, but rather, areas were selected based on their scores for the five factors and based on the area's ability to meet Regional Plan obligations. The mix of land uses in the area was an important consideration regarding the orderly and economic provision of public facilities and services.

The City also selected parcels distributed around the existing UGB for inclusion in the UGB expansion area. This was done in part to help provide variety in the locations and types of land available for development and to help distribute the impact of additional development throughout infrastructure systems.

Planned Neighborhoods: Rather than provide for individual land types on segregated portions of the urban reserve, most of the areas selected provide for an integrated mix of uses. By selecting areas that are conceptually planned for a variety of uses the City is not only meeting the Regional Plan requirement for mixed-use/pedestrian-friendly neighborhoods, but is also setting the stage for a type of neighborhood development that helps to improve public health and community cohesiveness.¹³

The inclusion of a portion of MD-5 south of Cherry Lane, north of Barnett Road, and east of the current UGB was done in part to help facilitate the continued development of the Southeast Plan. The Southeast Plan has been in stages of development since the 1990s. The plan is for a large mixed-use development east of North Phoenix Road, generally centered on Barnett Road. The inclusion of this particular portion of MD-5 helps to facilitate parts of the Southeast Plan, including a planned school, a planned park, and a planned trail connection. This property will also help to provide additional residential development in the area of the Southeast Plan, which will help to support planned commercial development in the area.

Compatibility: By requiring urbanization plans for each area prior to annexation the City will have the opportunity to consider the compatibility of the development with existing uses and other planned uses in the vicinity. The urbanization plans will also insure that the residential density and other requirements of the Regional Plan are met.

Conclusions—Social

¹³ For reference on the benefits of mixed-use development see «<http://www.wri.org/blog/2014/07/people-oriented-cities-mixed-use-development-creates-social-and-economic-benefits>»

The social consequences of the selected boundary location are positive relative to other boundary location alternatives. The selected location helps to minimize the effect that increased development will have on transportation by helping to promote the reduction of vehicle miles traveled. The expansion proposal has a positive effect on land availability by increasing the supply of all urbanizable land types and by selecting land that is both available for development and held by a large enough number of property owners to promote competition in the market. The boundary location was selected in large part due to its relative cost of development compared to the alternatives. The expansion areas and the land-use distributions help to promote mixed-use/pedestrian-friendly neighborhoods, which have a number of social benefits. Compatibility between development on these newly added areas and existing uses will be considered during the urbanization plan process, prior to annexation.

Conclusions—overall

On balance the environmental, social, economic, and energy (ESEE) consequences of the selected boundary are positive compared to other alternatives. The biggest factors in having a favorable ESEE are proximity to the existing UGB and a large enough distribution of ownership to promote competition in the market for urbanizable land. The City has selected land from its urban reserve that is both close to the existing UGB (and existing development) and comprised of a large enough number of parcels to help promote competition in the market for urbanizable land.

4. *Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB.*

Findings

A major emphasis of—and a driving force behind—the Greater Bear Creek Valley Regional Problem Solving Process (RPS), which resulted in the adoption of the Regional Plan Element, was the protection of farm and forest land from urbanization and incompatible urban development. That process resulted in the establishment of an urban reserve for the City of Medford. The urban reserve, by its definition, establishes the location of future urban development, having taken into account existing and planned farm and forest uses. In establishing the urban reserve, the City of Medford agreed to the agricultural buffer standards of the Regional Plan. Regional Plan Element, 4.1.10 requires the use of agricultural buffers to separate urban uses from agricultural uses. The City adopted code that applies to land added to the UGB from the Urban Reserve. (City Code Section 10.802, Urban–Agricultural Conflict in Urban Reserve, August 16, 2012).

Selecting parcels close in to the existing UGB allows for the continued rural use of the properties nearer the outer edge of the urban reserve. The lower-intensity use of properties in the outer fringe can act as a buffer between urban uses and farm and forest uses outside of the UGB.

Conclusions

By selecting parcels near the existing UGB for inclusion into the UGB, the City is leaving properties on the outer edge of the Urban Reserve to act as a buffer between urban uses and agricultural and forest activities occurring on land outside of the UGB. Furthermore, Municipal Code Section 10.802 requires conflict mitigation (including buffers) between urban uses and agricultural uses.

Now that the urban reserve has been established for the City of Medford, and the required agricultural buffer codes are in place, all land within the urban reserve is both available for, and appropriate for, future urban development. This fact is apparent in ORS 197.298 which identifies land that is designated urban reserve as being first priority land when expanding an urban growth boundary.

Boundary Location Summary Findings and Conclusions

The City of Medford has used each of the four boundary locational factors in determining the future boundary location. Each of these factors had to be weighed and balanced against each of the others and the proposed boundary amendment as a whole scored well on each of these factors. An alternatives analysis was not completed on a parcel-by-parcel basis but rather the reasons for how and why areas were selected (or eliminated) through each of the steps/processes (coarse filter, serviceability, ESEE) has been provided. This process of selecting certain areas over others through each of the steps is the City's alternatives analysis. An alternatives analysis was not completed on a parcel-by-parcel basis for the following reasons: 1) the tax lots (parcels) involved are of vastly different size, 2) the number of possible alternatives to compare is prohibitively large, 3) the properties have been planned for a number of different uses, and 4) there is value in analyzing the recommendation as a whole using the boundary location factors.

Tax lots could not be objectively compared, one against another, because the tax lots vary greatly in size. How can a 5-acre tax lot be objectively weighed against a 100-acre tax lot? The only way to fairly compare the two would be to either break the larger tax lot into smaller pieces or to combine a number of smaller tax lots into a larger aggregate. Not only would this exercise require the planners to choose where to split tax lots and/or which tax lots to combine, it would also alter a part of the what defines each of these tax lots, their size and parcelization characteristics. Because of these challenges, when comparing boundary location alternatives, rather than compare different tax lots, areas (all of MD-8, portions of MD-5, etc.) were compared. This not only helped to balance the size of the areas compared, it also helped in comparing characteristics that could not be compared on a parcel-by-parcel basis. These characteristics included the mix of conceptual plan uses, the coordination of transportation infrastructure, and parcelization.

The use of larger sections of the urban reserve to compare against each other also helped to reduce the number of alternatives to compare. Still, a detailed comparison of each of these subareas against each of the others, for each of the boundary locational factors, was prohibitive in its magnitude. This kind of system would have required the

City to devise a weighted ranking system for each of the criteria. These ranked scores for each of the areas would then be totaled and areas would be selected based on scores, with the highest score being selected first and then moving down the list until the land need was met. But how do you compare a property planned for industrial use against one planned for residential? The planned use of the property has some value in determining which properties to select, but how do you determine the comparative value for property use designation? This kind of rigid system would likely miss nuances about how different areas interact with each other in a system. For example, this kind of ranking would not have considered the necessary mix of land types needed.

This kind of reductionist approach would limit the City's ability to consider the boundary location decision as a whole. After all, this is one cohesive proposal, determining where future urban development will occur around the city by selecting lands from a larger set made up entirely of "first priority land". The only way to insure that the proposal is balanced is to look at it in its entirety and compare it against the boundary locational factors as one piece.

* * * * *

Urban Growth Boundary amendment approval criteria from Urbanization Element, Section 1.2.3

Criterion a. continued: The standards and criteria in Goal 14, OAR 660, Division 24, and other applicable State Goals, Statutes, and Rules.

OAR 660

Oregon Administrative Rule (OAR) 660 is directed at the work of the Department of Land Conservation and Development (DLCD) and contains Rules for how to implement the applicable Statutes relating to the mission of DLCD. There are several sections of OAR 660 which apply to the adoption of individual Comprehensive Plan Elements. Each Comprehensive Plan Element being relied upon to support this UGB amendment (e.g., the Economic Element) was found to be consistent with all applicable portions of OAR 660 at the time of their adoption. Rather than repeat those findings here those findings are included in the record, and findings, for this proposed UGB amendment, through reference.

The proposed amendment's compliance with applicable portions of OAR 660 has been discussed, in large part, in the proceeding text. Any applicable portions of OAR 660, not already discussed, will be discussed below.

Division 24

Division 24 deals with Urban Growth Boundaries. Most of the applicable portions of Division 24 have already been covered in the Goal 14 findings above. These include: Popu-

lation Forecasts; Land Need; Land Inventory and Response to Deficiency; and Boundary Location Alternatives Analysis. The following portions of OAR 660-024-0020 (Adoption or Amendment of a UGB) also apply and will be discussed as indicated:

- (1) All statewide goals and related administrative rules are applicable when establishing or amending a UGB, except as follows:
 - (b) Goals 3 and 4 are not applicable; {This is covered under Goal 3 and Goal 4 below}
 - (c) Goal 5 and related rules under OAR chapter 660, division 23, apply only in areas added to the UGB, except as required under OAR 660-023-0070 and 660-023-0250; {This is covered under Goal 5 below}
 - (d) The Transportation Planning Rule requirements under OAR 660-012-0060 need not be applied to a UGB amendment if the land added to the UGB is zoned as urbanizable land, either by retaining the zoning that was assigned prior to inclusion in the boundary or by assigning interim zoning that does not allow development that would generate more vehicle trips than development allowed by the zoning assigned prior to inclusion in the boundary; {This is covered under Goal 12 below}

* * * * *

Urban Growth Boundary amendment approval criteria from Urbanization Element, Section 1.2.3

Criterion a. continued: The standards and criteria in Goal 14, OAR 660, Division 24, and other applicable State Goals, Statutes, and Rules.

Other applicable State Goals, Statutes, and Rules

Goal 1—Citizen Involvement

Findings

Goal 1 requires the City to have a citizen involvement program that sets the procedures by which affected citizens will be involved in the land use decision process. Goal 1 requires provision of the opportunity to review proposed amendments prior to a public hearing, and recommendations must be retained and receive a response from policy-makers. The rationale used to reach land use decisions must be available in the written record. The City of Medford has an established citizen-involvement program consistent with Goal 1 that includes review of proposed Comprehensive Plan amendments by the Planning Commission and City Council. Affected agencies and departments are also invited to review and comment on such proposals, and hearing notices are published in

the local newspaper, and posted on the site. This process has been adhered to in this proposed amendment.

The Planning Department conducted an open house (October 28, 2014) to receive comments about the scoring methods used for inclusion in the expansion from property owners within the urban reserve. For the public hearing process staff sent hearing notification to all property owners within the urban reserve. Staff prepared press releases and provided information on the City's website. Finally, this proposal ~~will have been~~ was considered by the Planning Commission and the City Council during televised public hearings.

The testimony and evidence provided to the community during the hearings was voluminous (see Appendix L; more than 120 letters were submitted during the Council meetings alone), but ultimately the expansion option chosen has come with the most support and concessions of the affected property owners and as such best complies with this Goal. Council gives credit to all who worked or volunteered their time on this process as Council believes that it meets all the overarching principles guiding land use in Oregon and specifically provides for a healthy environment, sustains a healthy economy, ensures a desirable quality of life, and has equitably allocated the benefits and burdens of land use planning.

Conclusions

By following a supplemented notification and comment procedure, the City provided better-than-adequate opportunities for citizen input.

Goal 2—Land Use Planning

Findings

The City has a land use planning process and policy framework in the form of a Comprehensive Plan and development regulations in Chapter 10 of the Municipal Code. These are the bases for decisions and actions. The process for amending the UGB and all Comprehensive Plan elements was found to be consistent with all State requirements at the time of their adoption.

Conclusions

There is an adequate factual basis for the proposed changes and the adopted process has been followed for this UGB amendment.

Goal 3— Not applicable per OAR 660-024-0020(1)(b).

Goal 4— Not applicable per OAR 660-024-0020(1)(b).

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

Findings

The City has regulations in place to guide the development and/or protection of environmentally sensitive areas such as steep slopes and riparian corridors. These rules will be extended to areas added to the UGB once annexed to the City. The City must also adopt a revised Local Wetland Inventory (LWI) for the areas added to the UGB through this proposal. The LWI will identify wetlands and determine which have local significance. A wetland protection ordinance will then be adopted to protect locally significant wetlands from development. This work will be completed once the final boundary of the UGB is determined. The LWI and wetland protection regulations must both be adopted prior to the annexation of any of the areas added to the UGB through this amendment. The City's historic inventory must also be amended to include the areas added through this amendment.

Some of the easternmost portions of the urban reserve are within a deer and elk habitat area. The Oregon Department of Fish and Wildlife (ODFW) would prefer that this area remain in its natural condition and if development does occur within this area it must have special standards used to protect the habitat or mitigation measures must be developed in coordination with ODFW to protect/enhance habitat. With the exception of Prescott and Chrissy parks, which allow for very limited development, none of the adopted proposal extends the UGB into the deer and elk habitat area.

According to OAR 660-024-0020 (Adoption or Amendment of a UGB) "Goal 5 and related rules under OAR chapter 660, division 23, apply only in areas added to the UGB, except as required under OAR 660-023-0070 and 660-023-0250." This means that Goal 5 compliance is only under review for the areas added to the boundary. Goal 5 compliance has already been demonstrated for the existing boundary. ORS 197.250 [Compliance with Goals Required] requires that "...all comprehensive plans and land use regulations adopted by local government to carry out those comprehensive plans... shall be in compliance with the goals within one year after the date those goals are approved by the Land Conservation and Development Commission." The City shall demonstrate full compliance with Goal 5 soon after the adoption of the revised UGB through the extension of existing development codes to areas added to the UGB, through the adoption of a wetland protection ordinance for locally significant wetlands within the newly added areas, and through the inclusion of these newly added areas in the City's historic inventory. [A wetlands inventory has already been completed; as of the date of this report the City is working on adoption of the inventory and protection regulations.](#)

Conclusions

The City will demonstrate compliance with all portions of Goal 5 within one year of the adoption of the proposed amendment and prior to annexation per OAR 660-024-0024 and per the revised Urban Growth Management Agreement.

Goal 6—Air, Water, and Land Resources Quality

Findings

One of the components of the coarse filter was proximity. Selecting parcels closer to the existing UGB not only helps to maximize the efficiency of public infrastructure, it helps the environment by reducing motor vehicle trips. A more compact urban area with mixed-use neighborhoods helps to promote the development and use of transit. Density and distance both play key roles in developing and maintaining public transit options. A more compact urban area also provides greater opportunities to invest in facilities for pedestrians and bicyclists, while at the same time making walking and biking more viable transportation options. The more compact urban area helps to reduce the amount of pollution caused by motor vehicle traffic by reducing the number of motor vehicle miles traveled; both by providing alternative modes of transportation and by reducing the distance traveled between home, work, shopping, recreation, and so forth.

Selecting parcels close in to the existing UGB also allows for the continued rural use of the properties nearer the outer edge of the urban reserve. Unused properties in the outer fringe of the urban reserve also benefits the City and the environment by acting as a buffer between urban uses and rural uses and/or natural areas. In contrast, selecting properties nearer the outside edge of the urban reserve would have the effect of disrupting the use of those properties and of the properties closer to the existing UGB. By reducing the impact on the urban reserve areas not being proposed for inclusion the City is limiting the amount of displacement of rural uses in the urban reserve, thus minimizing the impact on lands outside of the urban reserve.

Many of the Goal 5 findings, above, also apply to the findings here under Goal 6.

Conclusions

Environmental impacts, including air, water, and land resources quality, were key considerations during the adoption of the urban reserve. Now that the urban reserve is in place, and the City must select its future UGB from the urban reserve areas, the biggest environmental consideration is proximity. All of the urban reserve area will be added to the UGB and made available for urbanization eventually, but relative environmental impacts must be considered when determining which properties to include in the UGB at this time. The urbanization of any of this area will have some effect on the environment but the magnitude of the effect has been minimized by selecting parcels near the existing UGB. The environmental protection provisions in the Municipal Code will be extended to the areas added to the UGB when annexed. Both the LWI and wetland protection ordinance for these newly added areas must be adopted prior to the annexation of any of the areas.

Goal 7—Areas Subject to Natural Hazards

Findings

Slopes: The City of Medford has existing hillside regulations, Municipal Code Sections 10.929–10.933, that regulate the development of property with slopes in excess of 15 percent. These procedural requirements are meant to decrease soil erosion and protect

public safety. This code section will apply to any and all areas with slopes exceeding 15% added to the UGB through this amendment once annexed to the City. Areas exceeding 25% slope were classified as unbuildable in the capacity analysis.

Fire: The risk of wildfire in and around Medford often rises to extreme levels during the summer months. The City of Medford has Fire, Building, and Development codes in place to help to mitigate the risk of wildfire in the city. One such provision is Municipal Code Section 7.022, which prohibits the use of fireworks within the hazardous wildfire areas as defined by Jackson County.

Flood: Because the City participates in the National Flood Insurance Program, and is a CRS community, the Municipal Code allows development within flood plains provided that buildings meet certain construction standards designed to minimize damage from floods. City policies and codes do not have locational standards with respect to flood plains, but there is a recommendation in the Environmental Element that states “Development and redevelopment should be highly scrutinized when located in floodplains.”

Conclusions

When considering where to expand its UGB the City is limited to the areas within the urban reserve. All Statewide Planning Goals, including Goal 7, were considered as part of the selection of the urban reserve. The City has development standards in place to mitigate the risk of natural hazards from flood, fire, and steep slopes. These standards will be extended to applicable areas when annexed to the City.

Goal 8—Recreation Needs

Findings

The Other Residential Land Needs section of the Housing Element examines existing conditions for public and semi-public land to forecast future need for this land type.

According to the Housing Element:

Lands needed for public operations and facilities include lands for city facilities, schools, substations, and other public facilities. Land needs were estimated using acres per 1,000 persons for all lands of these types. Lands needed for parks and open space estimates use a parkland standard of 4.3 acres per 1,000 persons based on the level of service standard established in the Medford Leisure Services Plan Update (2006). This update includes land needed for neighborhood and community parks, which usually locate in residential plan designations. It does not include land needed for natural open space and greenways, which may also be located in residential plan designations.

The resulting land need for community and neighborhood parks is shown in *Table 1.5*.

Table 1.5. City Park Need (adapted from Housing Element Table 40)

Type of Use	Existing Acres	Existing Acres / 1000 Persons	Assumed Need (ac/1000 Persons)	Estimated Need per 1000 Persons, 2009–2029
City Parks	527	6.8	4.3	153

In addition to the standard urban reserve areas the Regional Plan Element identifies two large regional park areas, Prescott Park and Chrissy Park. These areas are City-owned wildland parks totaling 1,877 acres. Inclusion as urban reserve was intended to serve as a mechanism to eventually incorporate this City property into the City boundary. The two MD-P areas were not considered areas for future urban growth because of their classification as parkland. There is no residential, commercial, or industrial development planned for the MD-P acres. They present a tremendous recreational and open space asset to the City and the region, in addition to creating a buffer between the city and rural lands to the north and east. However, due to their location along the eastern periphery of the city and steep topography, these lands satisfy little of the localized open space needs throughout the city and do not meet land needs for traditional urban parkland.

Another regional recreation use already in existence is Centennial Golf Club. If the Manor-owned land surrounding it is brought in, then its inclusion is unavoidable. Its function as a regional asset will be unaffected by inclusion. The golf course has been counted as unbuildable by staff so far because the property owners intend to obtain an open space assessment for the land (ORS 197.186). Although the land has been classified as unbuildable in order to remain consistent with ORS 197.186 it might more appropriately be viewed as developed. The open space assessment helps to insure that the land will remain a golf course and as a golf course the land is already developed and meeting that regional need. The land will have no more ability to meet an identified land need for the City as a golf course within the boundary than it does outside of the boundary.

Conclusions

The Other Residential Land Needs of the Housing Element identified a need for 153 gross acres of additional parkland for neighborhood and community parks, outside of the existing UGB. The Regional Plan Element also includes two large wildland park areas that are owned by the City. These areas, Chrissy and Prescott parks, are intended to provide both a recreational and open space resource for the City and for the region. While both help to meet the recreational needs for the City these are two different land types (neighborhood and community park vs. regional/wildland park and open space) that provide two discreet types of uses for the City. The proposed UGB expansion will include an adequate supply of land determined to be needed by the Leisure Services Plan to accommodate a 20-year population.

Goal 9—Economic Development

Findings

Goal 9 factors were thoroughly addressed in the adoption and acknowledgement of the Economic Element of the Comprehensive Plan. Because the Economic Element has been deemed consistent with Goal 9, and it is being relied upon to determine the City's employment land need, detailed findings under Goal 9 are not necessary for this proposed boundary amendment. However, some discussion regarding Goal 9 compliance is provided below as a reference to the information from the Economic Element that was used in this amendment process. Much of this text is repeated from other sections of this document where it is more appropriately considered.

The process of determining Medford's land need for the next 20 years started with the adoption of the Population Element in 2007. This study looked at the forecasted population growth in Medford through 2040. The next step was the Buildable Lands Inventory (BLI), adopted in 2008, consistent with OAR 660-024-0050 and ORS 197.186 and 197.296. This study identified the number of acres, in total, and by type, available for development within the City's current UGB. The BLI showed that there are approximately 1,078 employment acres available for development within Medford's UGB. The next step was the Economic Element, adopted in 2008, which considered the projected population growth, along with economic trends, to determine the overall need for employment land over the 20-year planning period. The study concluded that an additional 708 gross acres were needed to meet the demand for employment land. However, as shown in the Appendix C, this does not properly account for the excess supply of industrial land available within the existing boundary. When properly calculated (see Appendix C) the need for employment land increases to 765 gross acres.

Through these studies the City of Medford demonstrated a deficit in the supply of employment land within its existing UGB over the next 20 years. ORS 197.296 subsection (6) recommends addressing the need by expanding the urban growth boundary, by increasing the developable capacity of the urban area, or by a combination of the two. Urban Growth Boundary Amendment (UGBA) Phase 1 (ISA GLUP Amendment) sought to change the General Land Use Plan map designation of land in the existing urban area for the purpose of increasing its development capacity in order to accommodate some of the City's projected need for residential and employment land. UGBA Phase 1 resulted in more efficient use within the UGB in the following ways:

- It took surplus industrial land (land in excess of the need for the next 20 years) and converted it to commercial land. This resulted in the accommodation of a larger portion of the employment need within the existing UGB.
- The conversion of industrial to commercial also helped to increase the likelihood of both commercial and industrial development over the next 20 years by placing these uses in more appropriate locations. There is heavy development pressure for commercial uses on the industrial land in the city core near major transportation routes. This pressure makes the land less likely to develop with industrial use. The swapping of land types places commercial designations on tracts of land within the city core while allowing the City to designate more land near the outside of the urban area for industrial development.

- While 58 acres of land were converted from residential to employment GLUP designations the total residential land need only increased by 36 acres. This is due to the fact that some of this land was not identified as meeting any portion of the future residential land need but it is now being counted toward meeting the employment land need. This land was identified as developed for residential but is expected to redevelop as commercial.

UGBA Phase 1 resulted in a decrease in the amount of land needed outside the current UGB. Before these efficiency measures, a total of 765 acres were needed outside of the existing UGB for employment purposes. After UGBA Phase 1, that number was reduced to 637 acres.

Conclusions

UGBA Phase 1 converted surplus industrial land to commercial land which allowed for more of Medford's need for employment land to be accommodated within its existing UGB. The conversion also resulted in the increased likelihood of a larger amount of Medford's employment land need being met within the existing UGB by more appropriately locating both commercial and industrial land. UGBA Phase 1 also reduced the overall land need for the City by converting some residential land that was not identified as meeting any portion of the future residential land need to employment land that is now counted toward meeting the employment land need. While 58 acres of land was converted from residential to employment GLUP map designations the total residential land need only increased by 36 acres. These adopted efficiency measures helped to address a portion of the City's employment land need, but an additional 637 gross acres of employment land outside of the existing UGB are needed. The proposed UGB expansion will allow the City to meet its identified need for employment land.

Goal 10—Housing

Findings

Goal 10 factors were thoroughly addressed in the adoption of the Housing Element of the Comprehensive Plan. Because the Housing Element has been deemed consistent with Goal 10, and it is being relied upon to determine the City's employment land need, detailed findings under Goal 10 are not necessary for this proposed boundary amendment. However, some discussion regarding Goal 10 compliance is provided below as a reference to the information from the Housing Element that was used in this amendment process. Much of this text is repeated from other sections of this document where it is more appropriately considered.

In 2012 the City, together with 5 other cities in the valley, adopted a Regional Plan for accommodating a doubling of the region's population. Regional Plan Element 4.1.5 requires a minimum density of 6.6 units per gross acre for all newly annexed areas for the years 2010 through 2035. The aggregate average density of the residential land need, determined by the Housing Element, was 6.9 units per gross acre (see *Table 1.2 under*

Land Need). Some of this density was then shifted into the existing UGB through UGBA Phase 1. This density shift resulted in an increased need for low-density residential and a decreased need for medium-density and high-density residential outside of the existing boundary. While this density shift helped to accomplish a number of positive benefits it also makes meeting the minimum density requirement of the Regional Plan more difficult. With the revised ratios of residential land types in the UGB expansion area, the average densities for each of the residential land types alone will not result in a density of 6.6 units per gross acre or above.

The Housing Element (2010) provides an accurate representation of the City's housing need over the next 20 years. The Regional Plan imposes a density standard that is in excess of the density supported by the Housing Element now that the intensification measures from UGBA Phase 1 are completed. The Regional Plan also requires a density of 7.6 units per gross acre for all newly added areas for the years 2036 to 2050. In order to meet the density obligations of the Regional Plan the City will require an urbanization plan to be submitted, showing compliance with the Regional Plan obligations for density and land use distribution, prior to annexation of any of the land added through this UGB amendment process. Acceptable methods for meeting the density standards will include:

- Committing areas to higher density zones within a General Land Use Plan (GLUP) designation. For example, an area within the UR GLUP designation could be designated as SFR-10 (Single Family Residential – 10 units per acre) which would insure a minimum density of 6 units per acre. By establishing “pre-zoning” within the established GLUP designations the residential density for the area can be moved higher than the minimum, or even average, density that the GLUP would accomplish.
- Requesting GLUP map changes as part of the urbanization plan approval process. This will allow for additional areas for medium-density and high-density development within the areas added to the UGB. This technique would allow for more flexibility in meeting the density obligations of the Regional Plan without imposing a housing mix that is not consistent with the Housing Element. This would allow for flexibility in housing types as the market shifts toward higher-density housing while also setting the stage for the future density standard of 7.6 units per acre required by the Regional Plan. This approach will also help to address the affordable housing need identified in the Housing Element. By adding additional high-density housing throughout the UGB (in the existing UGB through Phase 1 and in the newly added areas by allowing for GLUP changes to higher-density), the City is enabling more high-density housing, which is needed to provide more affordable housing within Medford.

Goal 10 requires that “plans shall encourage the availability of adequate numbers of needed housing units at price ranges and rent levels which are commensurate with the financial capabilities of Oregon households and allow for flexibility of housing location, type, and density.” By allowing some residential areas to request higher density GLUP

map designations the City is providing for more flexibility of housing types in the UGB expansion areas.

In addition to forecasting future residential land needs, the Housing Element also determined the amount of land needed for future public and semi-public uses. OAR 660-024-0040 (10) allows for a “safe harbor” net-to-gross factor of 25% for streets and roads, parks and school facilities. A letter was submitted into the record by Greg Holmes of 1000 Friends of Oregon, dated March 3, 2015, that challenges some of the City’s residential land need assumptions. Rather than use the safe harbor amount the Housing Element calculates the net-to-gross factor for streets based on observation of the existing residential areas in the city. According to the last paragraph on page 57 of the Housing Element “... the forecast shows land need in net acres. Net acres is the amount of land needed for housing, not including public infrastructure (e.g. roads). Gross acres is the estimated amount of land needed for housing inclusive of public infrastructure. The net-to-gross factor allows for conversion between net acres to gross acres. The net-to-gross factor is highest (23%) for single-family detached dwellings, decreasing to 10% for multi-unit projects.” Parks and schools were not considered in the net-to-gross factor, but rather, were included in the Public and Semi-public Land Needs portion of the Housing Element, which concluded that 153 acres of park land and 20 acres of school land was needed in the UGB expansion area.

The Other Residential Land Needs section of the Housing Element examines existing conditions for public and semi-public land to forecast future need for this land type.

According to the Housing Element:

Lands needed for public operations and facilities include lands for city facilities, schools, substations, and other public facilities. Land needs were estimated using acres per 1,000 persons for all lands of these types. Lands needed for parks and open space estimates use a parkland standard of 4.3 acres per 1,000 persons based on the level of service standard established in the Medford Leisure Services Plan Update (2006). This update includes land needed for neighborhood and community parks, which usually locate in residential plan designations. It does not include land needed for natural open space and greenways, which may also be located in residential plan designations.

See *Table 1.1*.

Conclusions

The Housing Element provides for an adequate land supply at a realistic housing mix for the planning horizon. In addition to land for housing, the Housing Element also accounts for land needed to provide for streets and other utilities, and for public and semi-public uses, which usually occur on residentially zoned properties. The residential density requirements of the Regional Plan were added to the Comprehensive Plan after the adoption of the Housing Element. By requiring urbanization plans for all of the areas being added to the UGB prior to annexation, the City can insure that the residential density

standards are being met. The required urbanization plans must demonstrate compliance with the minimum density standards and with the land use distributions required by the Regional Plan Element. By allowing some residential areas to change their GLUP map designation to higher densities the City is providing more flexibility of housing types in the UGB expansion areas. ~~In response to the various charges in the 1000 Friends letter, the City finds that unbuildable lands and the land need for rights-of-way, parks, and schools were correctly calculated. However, the City agrees that the private park land need was erroneously included, and that the government land need was double-counted; respectively, 18 acres and 135 acres were removed following the Planning Commission hearing.~~

Goal 11—Public Facilities and Services

Findings

The External Study Areas (ESAs) were made up of the properties that passed through the coarse filter. Additional data were collected for the ESAs regarding the serviceability for water, sewer, and transportation (Appendix F). This was done to measure the ability to provide public facilities and services in an orderly and economic fashion. The scoring memos provided by the service providers are attached as Appendix G.

For more thorough findings addressing Goal 11 please see those under Goal 14 locational factor, *“Orderly and economic provision of public facilities and services.”* As the same findings apply, they will not be repeated here.

Conclusions

By using the scores of the five factors, and considering an area’s ability to meet Regional plan obligations rather than comparing properties on a parcel-by-parcel basis, the City is able to expand its UGB in a way that will provide for the orderly and economic provision of public facilities and services.

Goal 12—Transportation

Findings

Land added to the UGB through this amendment will remain under the jurisdiction of Jackson County (Urban Growth Management Agreement will apply) and will retain its current County zoning until it is annexed to the City. Prior to the annexation of any of the land added to the UGB through this amendment, a revised Transportation System Plan (TSP), which includes the areas added through this amendment, must be adopted. The revised TSP will address transportation needs throughout the entire revised UGB. Areas within the UGB but outside the City Limit must go through the annexation and the zone change process before they are assigned a standard city zone and made available for urban-level development. The City, as a criterion for zone change, requires a demonstration of facilities adequacy for transportation prior to approving any zone change that would allow for urban development. OAR 660-024-0020(d) states:

The transportation planning rule requirements under OAR 660-012-0060 need not be applied to a UGB amendment if the land added to the UGB is zoned as urbanizable land, either by retaining the zoning that was assigned prior to inclusion in the boundary or by assigning interim zoning that does not allow development that would generate more vehicle trips than development allowed by the zoning assigned prior to inclusion in the boundary.

Since all land added through this amendment will retain the zoning that was assigned prior to inclusion in the boundary, the transportation planning rule does not apply to this amendment. Transportation system needs and transportation system adequacy will be addressed both prior to annexation and through the zone change process.

Work is underway to complete a revised TSP for the city which will include a ~~comprehensive overhaul~~ rewrite of the existing TSP. ~~Work on the TSP cannot be completed until the location of the revised boundary is known.~~

Conclusions

The City will require that a revised Transportation System Plan (TSP), which includes the areas added to the UGB through this amendment, be adopted prior to the annexation of any of the newly added land. The revised TSP will address transportation needs throughout the entire revised UGB.

Goal 13—Energy Conservation

Findings—Energy

The Regional Plan requires the development of mixed-use/pedestrian-friendly areas. This type of development encourages the use of travel modes other than driving, leading to a reduction in vehicle miles travelled. One of the components of the coarse filter was proximity. Selecting parcels closer to the existing UGB not only helps to maximize the efficiency of public infrastructure, it has the effect of reducing energy use by reducing motor vehicle trips. A more compact urban area, with mixed-use neighborhoods, helps to promote the development and use of transit. Density and distance both play key roles in developing and maintaining public transit options. A more compact urban area also provides greater opportunities to invest in facilities for pedestrians and bicyclists, while at the same time making walking and biking more viable transportation options. The more compact urban area helps to reduce energy consumption by reducing the number of motor vehicle miles traveled; both by providing alternative modes of transportation and by reducing the distance traveled between home, work, shopping, recreation, and so forth.

Conclusions—Energy

When considering where to expand the UGB, mixed-use development and proximity have the greatest impact on the use and/or conservation of energy. The fact that the needed houses and jobs would be efficiently contained in the current urban area and in

areas close to the existing UGB would have generally positive energy consequences due to the increased possibility of non-motorized travel modes between trip generators and decreasing overall vehicle miles travelled.

Goal 14—Urbanization

Findings

Refer to findings under Land Need and Boundary Location under Goal 14, starting on page 22 above.

Conclusions

The proposed UGB expansion area meets the requirements of all Goal 14 factors.

Goals 15–19 do not apply to Medford.

* * * * *

Urban Growth Boundary amendment approval criteria from Urbanization Element Section 1.2.3

Criterion a. continued: **The standards and criteria in Goal 14, OAR 660, Division 24, and other applicable State Goals, Statutes, and Rules.**

Other applicable Statutes, and Rules

There are numerous Statutes and Rules that apply to the adoption of individual Comprehensive Plan elements. Each Comprehensive Plan element being relied upon to support this UGB amendment was found to be consistent with all applicable Statutes, and Rules at the time of their adoption. Those findings are included in the record and findings for this proposed UGB amendment, by reference.

The State Goals, as they apply to the proposed amendment, have been discussed in detail above. The State Statutes and Rules that apply directly to the proposed UGB amendment deal either with determining land need or determining boundary location, both of which have been discussed in detail above (see “Land Need” and “Boundary Location” sections).

* * * * *

Urban Growth Boundary amendment approval criteria from Urbanization Element Section 1.2.3

Criterion b. **Compliance with Medford Comprehensive Plan policies and development code procedures.**

City of Medford Comprehensive Plan Conclusions, Goals, Policies, and Implementation Strategies:

Findings

The following Comprehensive Plan Goals, Policies, and Implementation Strategies support the inclusion of Prescott Park and Chrissy Park in the City's UGB:

Physical Characteristics

Policy 2-A: The City of Medford shall acknowledge Prescott Park (Roxy Ann Peak) as the City's premier open space and viewshed, and recognize its value as Medford's most significant scenic view, currently and historically.

Implementation 2-A(1): Investigate inclusion of Prescott Park in Medford's Urban Growth Boundary and City limits in order to enhance public safety and the feeling of ownership by city residents, protect its natural resources, preserve and enhance convenient public access, protect the public from fire hazards, and help in establishing a network of open space corridors with recreational trails.

Implementation 2-A(2): Identify lands surrounding Prescott Park that are critical to ensuring long term protection and meeting open space/viewshed goals and policies, for acquisition or other types of public management. Seek funding sources.

Implementation 2-A(3): Consider methods to address the interface between Prescott Park and adjacent development to assure compatibility, such as a buffering program, enhanced review of City and County development applications within a specified area surrounding Prescott Park, and joint policies or an "Area of Mutual Planning Concern" with Jackson County.

Policy 2-B: The City of Medford shall strive to preserve and protect the visual amenities offered by the foothills.

Parks, Recreation, and Leisure Services

Policy 2-C: The City of Medford shall give special consideration to Prescott Park in order to protect this dynamic natural and recreational resource and most significant scenic view for the enjoyment of present and future generations.

Implementation 2-C (3): Pursue inclusion of Prescott Park in the Medford Urban Growth Boundary for eventual inclusion within the City of Medford.

Implementation 2-C (4): Increase access and public enjoyment of Prescott Park by developing appropriate facilities to enhance appreciation of natural resources, the outdoors, and Medford's unique environment. Until included within the Medford Urban Growth Boundary, improvements within Prescott Park must comply with Jackson County land use regulations, as well as state rules and statutes, which may limit the extent of improvements on land outside of UGBs.

Solid Waste Management

Policy 1-E: The City of Medford shall assure that appropriate measures are taken to secure compatibility between the development and use of the Dry Creek Landfill and Prescott Park.

The following Comprehensive Plan Goals, Policies, and Implementation Strategies support a compact urban area with mixed-use neighborhoods:

Natural Resources—Air Quality

Implementation 3-A(3): Implement strategies from sources such as the Medford Transportation System Plan, the State Implementation Plans (SIPs) and the Oregon Transportation Planning Rule (TPR) that reduce emissions or improve air quality, such as increasing the use of alternative modes of transportation and use of alternative motor vehicle fuels, such as compressed natural gas and electricity, and propose amendments to the Medford Land Development Code for consideration by the City Council where necessary to assure compliance with such plans or rules.

Policy 3-B: The City of Medford shall continue to require a well-connected circulation system and promote other techniques that foster alternative modes of transportation, such as pedestrian oriented mixed-use development and a linked bicycle transportation system.

Health Services

Policy 1-A: The City of Medford shall strive to provide transportation, utilities, and other public facilities and services needed to support health care facilities within the Urban Growth Boundary, consistent with the health care facilities' growth requirements.

Natural resources

Policy 9-A: The City of Medford shall target public investments to reinforce a compact urban form.

Policy 9-B: The City of Medford shall strive to protect significant resource lands, including agricultural land, from urban expansion.

Natural Resources—Energy

Policy 10-A: The City of Medford shall plan and approve growth and development with consideration to energy efficient patterns of development, utilizing existing capital infrastructure whenever possible, and incorporating compact and urban centered growth concepts.

Implementation 10-A(1): Ensure that the extension of urban services is consistent with policies contained in the "Public Facilities Element" of the Medford Comprehensive Plan regarding energy efficiency.

The following Comprehensive Plan Goals, Policies, and Implementation Strategies support the use of adopted Population, Economic, Housing, and Buildable Lands Elements to determine land need:

Population Element

Policy 1: The City of Medford shall cooperate with other government agencies and the private sector to provide land and urban services sufficient to accommodate projected population growth in the UGB.

Policy 2: The City of Medford shall use the population forecast adopted in the Population Element of the Medford Comprehensive Plan as the basis for developing land use planning policy (Official population projection: 112,624 for the year 2027, and 133,397 for the year 2040.)

Economic Element

Employment Land Demand and Supply

1. This analysis indicates that additional land in the UGB is required to satisfy the City's land needs over the planning horizon.
2. The City of Medford has selected the High Employment Growth Scenario under which the City is projected to need 1,644 net buildable acres over the 20-year planning horizon and 2,055 gross buildable acres, consisting of needed acres in the following categories:
 - a. 504 net buildable acres of Office Commercial
 - b. 589 net buildable acres of Industrial
 - c. 609 net buildable acres of Retail Commercial
 - d. 38 net buildable acres of Overnight Lodging
 - e. 315 net buildable acres of Specialized Uses

The City has a supply of 900 acres of vacant employment land and an additional 178 net acres is expected to be available in the existing UGB to meet new demand through redevelopment. Based upon the adopted High Growth Scenario, the City of Medford has a deficit of 566 net buildable acres which equals 708 gross acres of employment land.

Economic Opportunities

Policy 1-5: The City of Medford shall assure that adequate commercial and industrial lands are available to accommodate the types and amount of economic development needed to support the anticipated growth in employment in the City of Medford and the region.

Implementation 1-5(b): Reduce projected deficits in employment lands by changing GLUP Map designations within the existing Urban Growth Boundary.

Implementation 1-5(c): Assist in the identification of sites for businesses that have unique site requirements.

Implementation 1-5(d): Ensure that demand projections for medium and large Commercial, Industrial and Office sites are captured in aggregate land demand projections during GLUP map amendments and/or UGB expansions.

Policy 1-7: The City of Medford will rely upon its High Employment Growth Scenario in the City's Economic Element twenty-year Employment Projections, Land Demand Projections, and Site Demand Projections when planning its employment land base.

Housing Element

6. Medford will need 1,890 net residential acres, or 2,383 gross residential acres, to accommodate new housing between 2009 and 2029. Not all of this can be accommodated within the

current urban growth boundary. Therefore, Medford has a deficit of 996 gross acres in the following designations:

Implementation 1-A: When considering changes to the Medford Comprehensive Plan or Land Development Code, base such changes on the Housing Element adopted on December 2, 2010, particularly:

Housing Need Projection in Table 31

Forecast of Needed Housing Units in Table 37

Buildable Land Needed for New Dwelling Units in Table 39

Residential Land Deficit by Plan Designation in Table 41

Implementation 5-A: Maintain an inventory of areas suitable for preservation as open space.

Compliance with applicable Goals and Policies of the Regional Plan Element are discussed below:

Regional Plan Element – Implementation Measure

7. Conceptual Transportation Plans. Conceptual Transportation Plans shall be prepared early enough in the planning and development cycle that the identified regionally significant transportation corridors within each of the URs can be protected as cost-effectively as possible by available strategies and funding. A Conceptual Transportation Plan for an urban reserve or appropriate portion of an urban reserve shall be prepared by the City in collaboration with the Rogue Valley Metropolitan Planning Organization, applicable irrigation districts, Jackson County, and other affected agencies, and shall be adopted by Jackson County and the respective city prior to or in conjunction with a UGB amendment within that UR.
 - a. Transportation Infrastructure. The Conceptual Transportation Plan shall identify a general network of regionally significant arterials under local jurisdiction, transit corridors, bike and pedestrian paths, and associated projects to provide mobility throughout the Region (including intracity and intercity, if applicable).

The City has prepared a conceptual transportation plan for all of the urban reserve areas around the city. The plan identifies regionally significant transportation corridors and was developed in collaboration with the Rogue Valley Metropolitan Planning Organization, applicable irrigation districts, Jackson County, and other affected agencies. The Medford Street Functional Classification Plan Map will be amended to include the higher-order streets within the UGB expansion area.

Regional Plan Element – Implementation Measure

8. Conceptual Land Use Plans. A proposal for a UGB Amendment into a designated UR shall include a Conceptual Land Use Plan prepared by the City in collaboration with the Rogue Valley Metropolitan Planning Organization, applicable irrigation districts, Jackson County, and other affected agencies for the area proposed to be added to the UGB as follows:

- a. Target Residential Density. The Conceptual Land Use Plan shall provide sufficient information to demonstrate how the residential densities of Section 4.1.5 above will be met at full build-out of the area added through the UGB amendment.
- b. Land Use Distribution. The Conceptual Land Use Plan shall indicate how the proposal is consistent with the general distribution of land uses in the Regional Plan, especially where a specific set of land uses were part of the rationale for designating land which was determined by the Resource Lands Review Committee to be commercial agricultural land as part of an urban reserve, which applies to the following URs: CP-1B, CP-1C, CP-4D, CP-6A, CP-2B, MD-4, MD-6, MD-7mid, MD-7n, PH-2, TA-2, TA-4.
- c. Transportation Infrastructure. The Conceptual Land Use Plan shall include the transportation infrastructure required in Section 4.1.7 above.
- d. Mixed Use/Pedestrian Friendly Areas. The Conceptual Land Use Plan shall provide sufficient information to demonstrate how the commitments of Section 4.1.6 above will be met at full build-out of the area added through the UGB amendment.

The City has prepared conceptual land use plans for all areas within the urban reserve in collaboration with the Rogue Valley Metropolitan Planning Organization, applicable irrigation districts, Jackson County, and other affected agencies. The plans show land use distributions, transportation infrastructure, and mixed-use/pedestrian-friendly areas. In addition to these conceptual plans, the City will require all areas to have urbanization plans prior to annexation and the City will require applicants to demonstrate that those plans have been coordinated with applicable irrigation districts. The required urbanization plan shall show compliance with the target residential density, more detailed land use distributions, more detailed information regarding transportation infrastructure, and fully demonstrate compliance with the requirement for mixed-use/pedestrian-friendly areas.

Regional Plan Element – Implementation Measure

9. Conditions. The following conditions apply to specific Urban Reserve areas:
 - a. MD-6. Prior to incorporation into the Urban Growth Boundary, a property line adjustment or land division shall be completed for Tax Lots 38-1W-05-2600 and 38-1W-06-100 so that the tax lot lines coincide with the proposed Urban Growth Boundary.

Tax Lots 38-1W-05-2600 and 38-1W-06-100 are not included in the UGB expansion area.

Regional Plan Element – Implementation Measure

13. Urban Growth Boundary Amendment. Pursuant to ORS 197.298 and Oregon Administrative Rule 660-021-0060, URs designated in the Regional Plan are the first priority lands used for a UGB amendment by participating cities.
 - a. Land outside of a city's UR shall not be added to a UGB unless the general use intended for that land cannot be accommodated on any of the city's UR land or UGB land.

Only land within the City's urban reserve is being considered for inclusion in the UGB.

Regional Plan Element – Implementation Measure

17. Parkland. For the purposes of UGB amendments, the amount and type of park land included shall be consistent with the requirements of OAR 660-024-0040 or the park land need shown in the acknowledged plans.

OAR 660-024-0040 (10) allows for a safe harbor net-to-gross factor of 25% for streets and roads, parks, and school facilities. Rather than use the safe harbor amount the Housing Element calculates the net-to-gross factor for streets based on observation of the existing residential areas in the city. According to the Housing Element "... the forecast shows land need in net acres. Net acres is the amount of land needed for housing, not including public infrastructure (e.g. roads). Gross acres is the estimated amount of land needed for housing inclusive of public infrastructure. The net-to-gross factor allows for conversion between net acres to gross acres. The net-to-gross factor is highest (23%) for single-family detached dwellings, decreasing to 10% for multi-unit projects." Parks and schools were not considered in the net-to-gross factor, but rather, were included in the 'Other Residential Land Needs' portion of the Housing Element, which concluded that 153 acres of park land and 20 acres of school land were needed in the UGB expansion area.

The 'Other Residential Land Needs' section of the Housing Element examines existing conditions for public and semi-public land to forecast future need for this land type.

According to the Housing Element:

Lands needed for public operations and facilities include lands for city facilities, schools, substations, and other public facilities. Land needs were estimated using acres per 1,000 persons for all lands of these types. Lands needed for parks and open space estimates use a parkland standard of 4.3 acres per 1,000 persons based on the level of service standard established in the Medford Leisure Services Plan Update (2006). This update includes land needed for neighborhood and community parks, which usually locate in residential plan designations. It does not include land needed for natural open space and greenways, which may also be located in residential plan designations.

See Table 1.1.

A letter was submitted into the record by Greg Holmes of 1000 Friends of Oregon, dated March 3, 2015, that challenges some of the City's land need assumptions. Of the various charges of land excess in the 1000 Friends letter, the City finds that unbuildable lands and the land need for rights-of-way, parks, and schools were correctly calculated. ~~However, the City agrees that the private park land need was erroneously included, and that the government land need was double-counted; respectively, 18 acres and 135 acres should be removed.~~

In addition to the standard urban reserve areas the Regional Plan Element identifies two large regional park areas, MD-P Prescott and MD-P Chrissy, which contain Prescott Park and Chrissy Park, respectively. These areas are City-owned wildland parks totaling 1,877

acres. Inclusion as urban reserve was intended to serve as a mechanism to eventually incorporate this City property into the City boundary. The two MD-P areas were not considered areas for future urban growth because of their classification as parkland. There is no residential, commercial, or industrial development planned for the MD-P acres. They present a tremendous recreational and open space asset to the City and the region, in addition to creating a buffer between the city and rural lands to the north and east. However, due to their location along the eastern periphery of the city and very steep topography, these lands satisfy little of the localized open space needs throughout the city and do not meet land needs for traditional urban parkland.

Regional Plan Element – Implementation Measure

18. Slopes. Future urban growth boundary amendments will be required to utilize the definition of buildable land as those lands with a slope of less than 25 percent, or as consistent with OAR 660-008-0005(2) and other local and state requirements.

The capacity analysis that was completed for the ESAs only classified sloped land as un-buildable for those areas where the slopes exceeded 25 percent.

Regional Plan Element – Implementation Measure

20. Future Coordination with the RVCOG. The participating jurisdictions shall collaborate with the Rogue Valley Council of Governments on future regional planning that assists the participating jurisdictions in complying with the Regional Plan performance indicators. This includes cooperation in a region-wide conceptual planning process if funding is secured.

The City of Medford has continued to collaborate with the Rogue Valley Council of Governments and other participating jurisdictions since the adoption of the Regional Plan. The City will coordinate the adoption of urbanization plans for each of the areas added to the UGB through this amendment. The City will also continue to collaborate with the Rogue Valley Council of Governments on future regional planning that assists the participating jurisdictions in complying with the Regional Plan performance indicators.

Conclusions for Criterion b.

There are several Comprehensive Plan Conclusions, Goals, and Policies that support the inclusion of Prescott and Chrissy Park into the UGB. The proposed boundary location will bring both of these City-owned areas into the UGB. There are also several Comprehensive Plan Conclusions, Goals, and Policies that support a compact urban area with mixed-use neighborhoods. The efficiency measure of UGBA Phase 1 helped with both of these goals. The proposed boundary location was selected in large part because of its proximity to the existing UGB and to existing development. Areas that presented better opportunities for mixed-use development were given priority over lands that would provide for a lesser mix of uses.

The Comprehensive Plan Conclusions, Goals, and Policies support the use of adopted Population, Economic, Housing, and Buildable Lands Elements in determining land need. These adopted elements were used without modification to determine the land need

for the City. In other cases the information from the elements had to be interpreted and applied in order to determine the number of acres needed in each of the GLUP categories. At other times conflicts between these adopted elements and the Regional Plan had to be reasoned through and the resulting boundary amendment is the result of balancing the existing elements to the degree possible.

The City will require areas added through this amendment to have urbanization plans prior to annexation. The required urbanization plan must show compliance with the target residential density, more detailed land use distributions, more detailed information regarding transportation infrastructure, and fully demonstrate compliance with the requirement for mixed use/pedestrian friendly areas. The remaining Regional Plan requirements have been addressed through the proposed amendment at this time.

The proposed UGB amendment and boundary location are consistent with the policies of the Comprehensive Plan.

* * * * *

Urban Growth Boundary amendment approval criteria from Urbanization Element, Section 1.2.3

Criterion c. Compliance with Jackson County’s development ordinance standards for urban growth boundary amendment. Many of the findings made to satisfy subparagraph (a), preceding, will also satisfy this criterion.

Per the Jackson County Land Development Ordinance (LDO) a Type 4 Permit application will be submitted to Jackson County for the proposed urban growth boundary amendment. The proposed amendment will follow the application process of LDO Section 3.7.3(E) for UGB Amendment, which requires a legislative hearing and County Planning Commission recommendation to the Board of Commissioners.

Jackson County LDO Section 3.7.3(E) — Standards for Amending an Adopted Urban Growth Boundary, Urban Reserve Area, Urban Fringe, or Buffer Area

In addition to the requirements contained in joint Urban Growth Boundary agreements and Urban Reserve agreements, all proposed boundary and area amendments must comply with applicable State Law, Statewide Planning Goals, the County Comprehensive Plan and any Regional Problem Solving documents adopted by the County.

Findings

Findings of compliance with applicable State Law, Statewide Planning Goals, and Regional Problem Solving Documents were made under criteria a. and b. above.

Urban Growth Boundary agreements:

Urbanization Element of the City of Medford Comprehensive Plan

Appendix 1. Urban Growth Management Agreement

Compliance with the requirements contained in the joint Urban Growth Boundary agreements and Urban Reserve agreements and with the County Comprehensive Plan will be discussed below. Not all sections of the agreements apply to the proposed boundary amendment. Only applicable portions will be repeated and discussed.

3.e. If the city and county have mutually approved, and the city has adopted, conversion plan regulations for the orderly conversion of property from county to city jurisdiction, the county will require that applications for subdivisions, partitions, or other land divisions within the UGB be consistent with the city's Comprehensive Plan. Once developed, the mutually agreed upon conversion plan shall be the paramount document, until incorporation occurs.

[and]

6. The city, county and affected agencies shall coordinate the expansion and development of all urban facilities and services within the urbanizable area.

Findings

The City has prepared conceptual land use and transportation plans for all areas within the urban reserve in collaboration with the Rogue Valley Metropolitan Planning Organization, applicable irrigation districts, Jackson County, and other affected agencies. The plans show land use distributions, transportation infrastructure, and mixed-use/pedestrian-friendly areas. The plans will be adopted by the City of Medford and by Jackson County in conjunction with this UGB amendment.

In addition to these conceptual plans, the City will require all areas to have urbanization plans prior to annexation. The required urbanization plan shall show compliance with the target residential density, more detailed land use distributions, more detailed information regarding transportation infrastructure, and fully demonstrate compliance with the requirement for mixed-use/pedestrian-friendly areas.

The required urbanization plans will be adopted into the Neighborhood Element of the Comprehensive Plan and will provide a greater level of specificity than the GLUP map regarding future land use in the areas added to the UGB.

9. Long-range transportation and air quality planning for the urbanizable area shall be a joint city/county process coordinated with all affected agencies.

The City is in the process of updating its Transportation System Plan (TSP). The revised TSP will include all portions of the UGB, including areas added through this amendment. The TSP will be produced in coordination with Jackson County and must be adopted prior to the annexation of any of the areas added to the UGB through this amendment.

The Medford Street Functional Classification Plan Map will be amended to include the higher-order streets within the UGB expansion area.

11. Proposed land use changes immediately inside the UGB shall be considered in light of their impact on, and compatibility with, existing agricultural and other rural uses outside the UGB. To the extent that it is consistent with state land use law, proposed land use changes outside the UGB shall be considered in light of their impact on, and compatibility with, existing urban uses within the UGB.

12. The city and county acknowledge the importance of permanently protecting agricultural land outside the UGB zoned EFU, and acknowledge that both jurisdictions maintain, and will continue to maintain, policies regarding the buffering of said lands. Urban development will be allowed to occur on land adjacent to land zoned EFU when the controlling jurisdiction determines that such development will be compatible with the adjacent farm use. Buffering shall occur on the urbanizable land adjacent to the UGB. The amount and type of buffering required will be considered in light of the urban growth and development policies of the city, and circumstances particular to the agricultural land. The controlling jurisdiction will request and give standing to the non-controlling jurisdiction for recommendations concerning buffering of urban development proposals adjacent to lands zoned EFU.

Findings

The selecting of parcels close in to the existing UGB allows for the continued rural use of the properties nearer the edge of the urban reserve. The lower-intensity use of properties in the outer fringe of the urban reserve can act as a buffer between urban uses and farm and forest uses outside of the UGB.

The performance indicator of Regional Plan Element 4.1.10 requires the use of agricultural buffers to separate urban uses from agricultural uses. The City adopted City Code Section 10.802, Urban–Agricultural Conflict in Urban Reserve on August 16, 2012. This section applies to land in the urban growth boundary that is added from the urban reserve shown in the Regional Plan.

13. All UGB amendments shall include adjacent street and other transportation rights-of-way.

Findings

The City proposes to include adjacent street and other transportation rights-of-way in its UGB amendment. The City previously committed to this in the URMA and is following through with that commitment.

Urban Reserve agreements:

Regional Plan Element of the City of Medford Comprehensive Plan

Appendix C. Urban Reserve Management Agreement

5.E(i) County Roads. ...When City's UGB is expanded into the UR (Urban Reserve), County will require (e.g., through a condition of approval of UGB amendment) that City assume jurisdiction over the county roads within the proposed UGB at the time of annexation into the City regardless of the design standard used to construct the road(s) and regardless of when and how the road(s) became county roads...

...When a proposed UGB amendment will result in a significant impact to a county road(s) already within the City's limits, or existing UGB, such that the proposed amendment depends on said county road(s) for proper traffic circulation, then a nexus is found to exist between the proposed UGB expansion and said county road(s). Where such a nexus exists, the county may require, as a condition of approval, the transfer of all, or portions of, said county road(s) within the existing UGB or City's limits at the time of annexation, regardless of the design standards to which the road is constructed.

Findings

The City previously committed to this in the URMA, and is adopting similar language into the Urban Growth Management Agreement (UGMA) as a part of this amendment. The County has helped to identify areas where the proposed UGB amendment will result in a significant impact to a county road(s) already within the City's limits or existing UGB. The transfer of all, or portions, of such county road(s) is being adopted as a condition of annexation for these properties.

5.H Service Expansion Plans. As the future provider of water, sewer, parks and recreation, road maintenance and improvement, and stormwater management services in the UR, City shall prepare and update service expansion plans and these plans shall be consistent with the UGBMA between City and County. These plans provide a basis for the extension of services within the UGB and shall be referred to County for comment.

Findings

~~ORS 197.250 [Compliance with Goals Required] requires that "...all comprehensive plans and land use regulations adopted by local government to carry out those comprehensive plans and all plans, programs, rules or regulations affecting land use adopted by a state agency or special district shall be in compliance with the goals within one year after the date those goals are approved by the Land Conservation and Development Commission."~~The City shall demonstrate full compliance with all Goals, including Goal 8: Recreation Needs; Goal 11: Public Facilities and Services; and Goal 12: Transportation, soon after the adoption of the revised UGB. All City plans for parks, transportation, stormwater, and other services are now being amended to include the areas added to the UGB. All such plans will be coordinated with the County.

County Comprehensive Plan

Findings

Areas added to the UGB through this amendment will remain under the jurisdiction of the County until they are annexed to the City. The UGMA will apply to these areas along with the County's Comprehensive Plan and applicable portions of the County's Land Development Ordinance. Once an area is annexed to the City the City's Comprehensive Plan and Land Development Code will apply. There are several portions of the County's LDO, which deal with special areas of consideration (listed below), that will apply to some of the areas added to the UGB through this amendment. These protections are consistent with the Statewide Goals, and the City has similar protections in place.

Section 7.1.1(B) ASC 82-2. Bear Creek Greenway

Section 7.1.1(C) ASC 90-1. Deer and Elk Habitat

Section 7.1.1(F) ASC 90-4. Historic Resources

Section 7.1.1(G) ASC 90-6. Archaeological Sites

Section 7.1.1(K) ASC 90-10. Ecologically or Scientifically Significant Natural Areas

Section 7.4.3. Urban Fringe

Section 7.4.3(F). Setbacks from Resource Lands and Reduction Requests

Section 8.6. Stream Corridors

Conclusions for Criterion c.

Jackson County's development ordinance requires a finding that UGB amendments are consistent with the requirements contained in joint Urban Growth Boundary agreements and Urban Reserve agreements, and that all proposed boundary and area amendments comply with applicable State Law, Statewide Planning Goals, the County Comprehensive Plan and any Regional Plan documents adopted by the County. Compliance with applicable State Law, Statewide Planning Goals, and Regional Plan documents has been discussed in the findings for criteria a. and b. above.

The proposed UGB amendment has also been shown to be consistent with the Urban Growth Management Agreement, the Urban Reserve Management Agreement, and the County's Comprehensive Plan. By showing compliance with these and applicable State Law, the City has demonstrated compliance with Jackson County's development ordinance standards for urban growth boundary amendment.

* * * * *

Urban Growth Boundary amendment approval criteria from Urbanization Element Section 1.2.3

Criterion d. Consistency with pertinent terms and requirements of the current Urban Growth Management Agreement between the City and Jackson County.

Findings

Consistency with pertinent terms and requirements of the current Urban Growth Management Agreement between the City and Jackson County is discussed under Urban Growth Boundary agreements and Urban Reserve agreements in the findings for criterion c. above.

Conclusions

See conclusions for criterion c. above.

* * * * *

SUMMARY CONCLUSIONS

1. The amendment is based on all of the City's Comprehensive Plan Elements, including the Housing Element, which are post-acknowledgment plan amendments that have been adopted according to our state land use laws and regulations. As the adopted elements, they form the basis by which the City can make its decisions.
2. Reliance on adopted plans thwarts the increase in regional sprawl that has occurred over the past decade. Considering this amendment as an extension of the regional problem solving process, the City of Medford has been involved in expansion of its urban area for over fifteen years. With a full commitment to that process, the City has invested considerably in not only time, but money and goodwill to following the best practices of land planning. In that time, other cities have grown disproportionately to Medford due to the City's lack of available housing stock and options. While Medford suffers from increased congestion from others in the region, following the City's adopted plans will accommodate the need for housing at higher density levels than in the past, provide a balance of housing types to accommodate a wider range of price accessibility, and regionally support the reduction in vehicle miles travelled and greenhouse gas emissions.
3. All lands considered for inclusion are within the urban reserves, and as such appropriate to be added. Also, all were fairly considered under Goal 14 evaluation factors, but it is acknowledged that the relative value of each of the included lands cannot be evaluated in purely objective or financial terms. Some areas, such as MD-7 and 8 have easy access to utilities and transportation, but also provide a distribution of land to be included throughout the city. Others, such as MD-5 East are essential to achieving goals deemed a priority for the City; specifically critical bike path connections from eastside park land that will connect to the regional greenway. Whether it is providing areas for aging in place to accommodate the anticipated doubling of the elderly population, or resolving ex-

isting enclave issues, each area to be included in this option has particular value for the City of Medford.

4. Finally, while the testimony and evidence provided to the community has been voluminous, the chosen expansion option has come with the most support and concessions of the affected property owners and as such best complies with Statewide Planning Goal 1 – Citizen Involvement. Credit should be given to all who worked or volunteered their time on this process as the Council believes that it meets all the overarching principles guiding land use in Oregon and specifically provides for a healthy environment, sustains a healthy economy, ensures a desirable quality of life, and has equitably allocated the benefits and burdens of land use planning.

APPENDIX A. AVAILABLE LAND

The purpose of the Buildable Lands Inventory (BLI), completed by the City in 2008, was to inventory the number and location of acres available for development within the existing UGB by individual land type.

RESIDENTIAL

The Buildable Lands Inventory concluded that residential land was available within the existing UGB in the following amounts: Urban [Low-Density] Residential (UR) = 2,385 acres, Urban Medium-Density Residential (UM) = 49 acres, and Urban High-Density Residential (UH) = 158 acres.

Table 2.1. Residential Land Supply (adapted from Housing Element Table 30)

Plan Designation	Supply (acres)	Plan Description
UR	2,385	Low-density Residential, 4–10 units/acre
Vacant	1,703	
Partially Vacant	419	
Redevelopable	263	
UM	49	Medium-density Residential, 10–15 units/acre
Vacant	35	
Partially Vacant	6	
Redevelopable	8	
UH	158	High-density Residential, 15–30 units/acre
Vacant	132	
Partially Vacant	14	
Redevelopable	13	
Total Residential	2,592	

The supply of residential land was changed through UGBA Phase 1. In many cases low-density residential land was converted to either medium-density or high-density. In other instances residential land was converted to employment land. The end result was a more efficient use of land within the existing UGB which resulted in a need of 92 fewer acres outside of the existing UGB. The resulting residential land supply after UGBA Phase 1 is shown below in *Table 2.2*.

Table 2.2. Residential Land Supply after UGBA Phase 1

Plan Designation	Supply (acres)	Plan Description
UR	2,215	Low-density Residential, 4–10 units/acre
Vacant	1,669	
Partially Vacant	371	
Redevelopable	174	
UM	121	Medium-density Residential, 10–15 units/acre

Appendix A: Available Land

Vacant	43	
Partially Vacant	30	
Redevelopable	48	
UH	215	High-density Residential, 15–30 units/acre
Vacant	138	
Partially Vacant	28	
Redevelopable	49	
Total Residential	2,550	

EMPLOYMENT

The Buildable Lands Inventory concluded that employment land was available within the existing UGB in the following amounts: Service Commercial (SC) = 172 acres, Industrial (GI & HI) = 641 acres, and Commercial (CM) = 265 acres.

Table 2.3. Employment Land Supply (adapted from Economic Element Figure 28)

Plan Designation	Supply	Plan Description
SC	172	Service Commercial: office, services, medical
GI & HI	641	General & Heavy Industrial: manufacturing
CM	265	Commercial: retail, services
Total Employment	1,078	

The supply of employment land was changed through UGBA Phase 1. In several cases industrial land was converted to commercial and in other instances residential land was converted to commercial. The end result was a more efficient use of land within the existing UGB which resulted in a need of 92 fewer acres outside of the existing UGB. The resulting employment land supply after UGBA Phase 1 is shown below in *Table 2.4*.

Table 2.4. Employment Land Supply after UGBA Phase 1

Plan Designation	Supply	Plan Description
SC	174	Service Commercial: office, services, medical
GI & HI	519	General & Heavy Industrial: manufacturing
CM	443	Commercial: retail, services
Total Employment	1,136	

APPENDIX B. LAND NEED

RESIDENTIAL

The City adopted the Housing Element of the Comprehensive Plan in December 2010. The Housing Element built on the conclusions of the Population Element (Nov 2007) and the Buildable Lands Inventory (Feb 2008). Over the 20-year period from 2009 to 2029 a total of 15,050 new dwelling units are needed in Medford. The available supply of residential land within the UGB is expected to accommodate 11,424 of those dwelling units leaving a need for 3,626 dwelling units to be provided for outside of the existing UGB. Of the dwelling units needed outside of the existing UGB, 2,233 are needed in UR, 498 are needed in UM, and 894 are needed in UH. To accommodate the needed dwelling units outside of the existing UGB 553 gross acres are needed using the following needed (gross) density factors: 4.8 dwelling units per acre for UR, 12.8 dwelling units per acre for UM, and 18.1 dwelling units per acre for UH. *Table 3.1* summarizes the residential land need.

Table 3.1. Residential Land Need (adapted from Housing Element Table 39)

GLUP Designation	Dwelling Units Needed¹⁴	Dwelling Unit Capacity	Dwelling Unit Deficit	Expected Density (Gross)	Needed Buildable Acres (Gross)
UR	10,036	7,803	2,233	4.8	465
UM	993	495	498	12.8	39
UH	3,329	2,435	894	18.1	49
Total					553

Group Quarters, such as dorms, jails, social service facilities, and nursing homes, are typically built in high-density and commercial zones. The Housing Element estimates that of the increased population over the 20-year period, two percent, or 712 people, will be housed in group quarters. Since these facilities are typically built in high-density and commercial zones the UH density of 18.1 dwelling units per acre was used, along with the average household size, to calculate a need of 16 acres of land for group quarters. This land was then allocated to the UH land demand bringing the total need for UH up to 66 acres and the total residential land need up to 570 acres.

¹⁴ In the Housing Element a portion of the dwelling unit need and the dwelling unit supply was shown to exist on commercial acreage. The portion of the residential need existing on commercial land was not used to calculate density or the number of acres needed to meet the housing demand, because the residential component on commercial land was assumed to exist in addition to a commercial use on that property.

Table 3.2. Acres for Group Quarters (adapted from Housing Element page 27 and Table 41)

	Group Quarters	Needed Acres
UR	0	465
UM	0	39
UH	16	66
Total		570

The Housing Element also included a calculation for needed public and semi-public land. These uses include parks, schools, churches, and fraternal lodges. The study concluded that there are roughly 17 acres of public and semi-public land for every 1,000 people in the existing UGB. The study assumed a need of 11.6 acres of public and semi-public land for every 1,000 people added to the population of Medford. Given the projected population increase of 35,591 people a total of 426 acres is needed for public and semi-public uses over the 20-year planning period. This land was allocated to the three residential land types based on the percentage of dwelling units needed for each type. The inclusion of the public and semi-public land need is summarized in *Table 3.3*.

Table 3.3. Public and Semi-Public Lands (adapted from Housing Element Tables 40 & 41)

	Public and Semi-Public	Total Acres Needed
UR	298	763
UM	29	68
UH	99	164
Total	426	996

When the supply of residential land was changed through UGBA Phase 1 (see *Tables 2.1* and *2.2*) the amount of land needed in each of the residential GLUP designations was also changed. With more of the high-density and medium-density need being met within the existing UGB, fewer acres of each of those land types need to be added. Conversely, since some of the low-density residential land supply has been displaced from within the existing UGB, a greater amount must now be added through the UGB amendment process. While UGBA Phase 1 resulted in a 58-acre conversion of land from residential to employment GLUP designations the total residential land need only increased by 36 acres. This is due to the fact that some of this land was not identified as meeting any portion of the future residential land need (because it was classified as developed) but it is now being counted toward meeting the employment land need (because it is expected to redevelop as commercial). *Table 3.4* shows the amount of residential land needed both before and after UGBA Phase 1.

Table 3.4. Residential Land Need before and after UGBA Phase 1

GLUP	Needed Acres Before	Needed Acres After
	Phase 1	Phase 1
UR	763	885
UM	68	27
UH	164	120
Total	996	1,032

EMPLOYMENT

The City adopted the Economic Element of the Comprehensive Plan in December 2008. The Economic Element built on the conclusions of the Population Element (adopted November 2007) and the Buildable Lands Element (adopted in February 2008). Over the 20-year period from 2008 to 2028 a total of 1,645 acres of employment land is needed in Medford. The Economic Element did not use the General Land Use Plan (GLUP) designations used by the City to classify employment land by type, but rather specifies the need for Office Commercial, Industrial, and Retail Commercial land. The Retail Commercial need can only be met in the Commercial (CM) GLUP designation because retail is only permitted within zoning districts allowed in CM. The Industrial need will be met in the General Industrial (GI) and the Heavy Industrial (HI) GLUP designations. The Office Commercial need will be met in both the CM and Service Commercial (SC) GLUP designations, which both allow for offices within their respective zoning types. Because the SC GLUP is intended to provide primarily for employment/office uses, such as business offices and medical offices, both the medium-size and large-size office site need is assigned to the SC GLUP designation. The small-size office site need is expected to be met by fill-in development, mixed with other commercial uses. This type of development is most appropriately accommodated within the zoning types permitted in the CM GLUP designation and is assigned to CM for land need.

In addition to the standard employment land categories the Economic Element identified a need for 284 "Other" acres, comprising 31 acres for overnight lodging and 253 acres for specialized uses. Since the "Other" acres need to be put into a city land use designation, and since the Economic Element did not do so, it is necessary to distribute those acres. Since about 9/10 of the "Other" category is described as "campus-type development," and since that type of development would only be a permitted use in the Industrial and the Service Commercial designations, a two-way partition (126 acres each) into those is appropriate. The other 31 net acres in the "Other" category are for overnight lodging; which are typically permitted in the CM designation.

Table 3.5. Conversion of Economic Element Designation to GLUP Designation (adapted from Economic Element Figure 28)

Use Type	Demand in Net Acres	Allocate Overnight and Specialized	Total Demand in Net Acres	GLUP Need in Net Acres
Office Commercial	404	126	530	SC = 352
Industrial	471	126	597	GI & HI = 597
Retail Commercial	488	31	519	CM = 697
City Residents	248			
Region/Tourists	240			
Overnight Lodging	31			
Specialized Uses	253			
Total	1,645		1,645	1,645

When we compare the supply of employment land, 1,078 acres (see *Table 2.3*), against the total demand, 1,645 acres (see *Table 3.5*), we see a deficit of 567 acres over the 20-year period. The Economic Element adds 25% to net acres to convert to gross acres, as recommended in DLCD Goal 9 guidebook, to account for streets and other infrastructure needs. The total employment land need is 709 acres when converted to gross acres.

However, this comparison of the overall supply of employment land against the overall demand does not provide an accurate representation of the employment land need for the City. When we compare the land need against the supply of land by employment GLUP type, we see that there is a 44-acre surplus of industrial land within the existing UGB over the 20-year period (*Table 3.6*). Since this surplus (if left in the industrial GLUP designations) does not help to meet the commercial land need, the actual need for employment land is 612 net acres, which converts to 765 gross acres. This is the true employment land need for the 20-year period.

Table 3.6. Employment Land Need in Net Acres

GLUP	Supply	Demand	Deficit (surplus)	Deficit for Land Need
SC	172	352	180	180
GI & HI	641	597	(44)	0
CM	265	697	432	432
Total				612

Table 3.6 shows that there is a surplus supply of industrial land within the existing UGB over the 20-year period. In accordance with ORS 197.296 subsection (6) the City undertook UGBA Phase 1 to increase the developable capacity of the urban area. This was done primarily by converting surplus industrial land to commercial land. It was also done by converting some residential land that was not identified as meeting any of the future residential land need to employment land that is now meeting some of the identified employment land need. Unlike with the residential land need, which increased by 36

acres based on the 58-acre change from residential to employment, the employment land need decreased by 58 acres based on those conversions.

As shown in *Table 3.7*, UGBA Phase 1 resulted in the addition of approximately two acres of SC land, bringing the total supply to 174 acres, and decreasing the deficit to 177 acres. UGBA Phase 1 added approximately 178 acres to the CM land, bringing the total supply to 443 acres, and decreasing the deficit to 254 acres. UGBA Phase 1 converted approximately 122 acres of GI & HI land, bringing the supply of land down to 519 acres, and changing the 44-acre surplus of land to a 77-acre deficit. By increasing the developable capacity of employment lands within the existing UGB, as recommended by ORS 197.296 (6), the City reduced its overall need for employment land from 765 gross acres to 637 gross acres, a difference of 128 gross acres.

Table 3.7. Employment Land Need after UGBA Phase 1 (net acres)

GLUP	Supply Before Phase 1	Supply After Phase 1	Demand	Deficit
SC	172	174	352	177
GI & HI	641	519	597	78
CM	265	443	697	254
Total				509

The number of net acres needed is then converted to gross acres in order to account for roads and other infrastructure resulting in a total employment land need of 637 gross acres.

Table 3.8. Net-to-Gross Conversion of Employment Land Need after UGBA Phase 1

GLUP	Deficit in Net Acres	Deficit in Gross Acres
SC	177	222
GI & HI	78	97
CM	254	318
Total		637

RESPONSES TO 1000 FRIENDS LETTER

The 3/3/2015 letter from 1000 Friends (Appendix C) claims a number of errors in the City’s land need calculations. The City asserts that the Housing Element was a correctly adopted and submitted post-acknowledgment plan amendment that the City is bound to follow, but it will aid understanding to illustrate methodologies that may be obscure.

OVERLAP—PARKS AND “UNBUILDABLE”

Explanation

The 1000 Friends letter charges that unbuildable land was improperly excluded from open space consideration (p. 357). The problem is that some of the land classified as “unbuildable” in staff’s capacity analysis can be classified as usable “open space.” For example, a riparian corridor may be part of a park or a trail system; on one hand it is unbuildable, on the other it is a component of a recreational use. Because of this overlap, some “unbuildable” acreage should be counted as usable “vacant” land.

Analysis

The assertion that a portion of the City’s identified park need should be shown as being met on acreage that has been classified as unbuildable assumes that unbuildable lands will be available for park facilities development. The City does not own any of the land that has been identified as unbuildable in the capacity analysis for the urban reserve. In order for this land to meet any portion of the identified park need the City would have to purchase or otherwise acquire the land.

The City of Newberg’s UGBA was remanded in part because the city did not show an overlap between unbuildable land and identified park needs. In that case the City of Newberg classified at least a portion of the land within the floodplain as unbuildable. The court determined that some of the park needs, including sports fields, could be expected to be met within the floodplain. Because of this, Newberg should have counted a portion of its park land need as being met within the unbuildable lands, specifically within the floodplain. For the Medford UGBA, however, staff did not classify any floodplain as “undevelopable.”

Floodplains have certain development standards that must be adhered to when developed, but because these areas are developable when those standards are met, they have not been counted as unbuildable in the capacity analysis for the urban reserve. Since all of the floodplain, unless it is within a riparian corridor or an identified wetland, is counted as buildable, the circumstances of the Newberg case do not apply to Medford’s proposal.

Even if the City chose to say that a portion of the park need would be met on the unbuildable acreage being included in the UGB, there is no way to determine how large this overlap should be. Will all trail development occur within riparian corridors, steep slopes, and wetlands? Any acreage value one assigned would only be a guess and therefore could easily be challenged as being either too large or too small. It probably cannot be more than one or two dozen acres.

The methodology used for the capacity analysis for the urban reserve was consistent with the methodology used for the buildable lands inventory and consistent with OAR 660-024-0050 and ORS 197.186 and 197.296. The capacity analysis did not count anything as unbuildable that was not supported by state statute but may have undercounted the unbuildable acreage by not counting any portion of the floodplain as unbuildable. For these reasons, staff believes the separation of the unbuildable acres and the identified park need is appropriate and will help to insure that an adequate supply of devel-

opable land will be available for needed park and recreation development for the 20-year period.

EXCESS OF “OTHER LAND NEEDS”

Explanation

The 1000 Friends letter also points out that cities may use a regulatory “safe harbor” net-to-gross factor of 25 percent for housing (net x 1.25). The purpose of this factor is to add acres to the net need for rights-of-way, parks, and schools¹⁵. The letter says that the Housing Element used a net-to-gross factor greater than 100 percent (net x 2.00). It concludes that the Element does not justify using a figure so much in excess of the safe harbor.

A response letter from Michael Savage, CSA Planning¹⁶, dated March 26, 2015, states that Medford, as a city with a population greater than 25,000, cannot use the safe harbor method. However, staff can find nothing in the OAR that prohibited the City from using the safe harbor if it had chosen to do so.

Analysis

The safe harbor was not used by the consultants who performed the housing needs analysis. Instead, for rights-of-way they analyzed existing development to determine typical net-to-gross factors for various densities¹⁷, and applied those proportionally. For parks and schools the consultants determined the existing supply ratios (in acres per thousand people), and adjusted those ratios downward for the next 20 years to accommodate an expected 35,591 new inhabitants¹⁸.

The resulting additional land need is in the following table. The middle column shows the acres needed by type to serve residential development. The rightmost column shows the percentage over net need for each type and in total.

<u>Type</u>	<u>Acres</u>	<u>Percent over Net Land Need</u>
<u>Rights-of-way</u>	<u>98</u>	<u>22%</u>
<u>Parks</u>	<u>153</u>	<u>34%</u>
<u>Schools</u>	<u>20</u>	<u>4%</u>
<u>Total</u>	<u>271</u>	<u>60%</u>

¹⁵ [OAR 660-024-0040 \(10\)](#).

¹⁶ [See 4/6/2015 study session packet, pp. 83–84](#)

¹⁷ [See Table 37 in Housing Element](#)

¹⁸ [See p. 10 in Housing Element](#)

However, the amounts are adjusted downward by adding in additional supply: 19 acres for parks and 26 acres for schools.

<u>Type</u>	<u>Acres</u>	<u>Percent over Net Land Need</u>
<u>Rights-of-way</u>	<u>98</u>	<u>22%</u>
<u>Parks</u>	<u>134</u>	<u>30%</u>
<u>Schools</u>	<u>=</u>	<u>0%</u>
<u>Total</u>	<u>232</u>	<u>51%</u>

Note the difference between the 1000 Friends argument and the figures above. The letter compares 524 acres¹⁹ to 455 acres. It errs in summing all those acres because it is not comparing the same categories.

The regulatory safe harbor comprises only three land use categories: rights-of-way, parks, and schools. In a comparison of just those three types the Housing Element's calculation results in a net-to-gross factor that is double the Administrative Rule amount (51% versus 25%). The figure is undeniably much larger than the safe harbor amount, but nonetheless it is based on an analysis of what has been built in existing residential areas, and it makes the correct move of reducing the provision ratios for parks and schools²⁰.

The amount of land used by streets, schools, and parks can vary widely from community to community, but in staff's experience the percentage taken up by streets alone is usually around 20 percent, so the OAR's safe harbor appears parsimonious. The City's figure was derived rationally and is a reasonable estimate of need.

¹⁹ 524 acres = "public & semi-public" + rights-of-way (426+98).

²⁰ Housing Element, table 40. Parks were reduced from 6.8 to 4.3 per thousand. Schools were reduced from 3.4 to 0.6 per thousand. The rationales for the reductions are explained on p. 63.

APPENDIX C. 1000 FRIENDS OF OREGON LETTER



133 SW Second Ave, Suite 201 • Portland, OR 97204 • (503) 497-1000 • fax (503) 223-0073 • www.friends.org
Southern Oregon Office • PO Box 2442 • Grants Pass, OR 97528 • (541) 474-1155 • fax (541) 474-9389
Willamette Valley Office • PO Box 51252 • Eugene, OR 97401 • (541) 520-3763 • fax (503) 223-0073

March 3, 2015

Joe Slaughter, Planning Department
and the Medford Planning Commission
City of Medford, Lausmann Annex
200 South Ivy Street
Medford, OR 97501

RECEIVED
MAR 04 2015
PLANNING DEPT.

Subject: File No. CPA-14-114, UGBA Phase 2, ESA Boundary Amendment

Dear Mr. Slaughter, and members of the Planning Commission:

Thank you for the opportunity to provide these comments regarding a proposed amendment to Medford's Urban Growth Boundary (UGB). 1000 Friends of Oregon is a nonprofit, charitable organization dedicated to working with Oregonians to enhance our quality of life by building livable urban and rural communities, protecting family farms and forests, and conserving natural and scenic areas. We have many members and supporters in Jackson County and the city of Medford.

This testimony is divided into two sections. The first includes some general observations regarding the ESA process and the staff proposal as we understand it today. That is followed by specific recommendations based on our review of the material on the city's website, the 2008 Economic Element, the 2010 Housing Element, and relevant portions of the Regional Plan Element of the Medford Comprehensive Plan. These comments are necessarily general and preliminary in nature. We anticipate more comments will be forthcoming once the staff report and supporting documentation become available for public review.

General Comments Regarding the ESA Concept and Boundary Amendment Proposal

As the Southern Oregon Advocate for 1000 Friends of Oregon since 2002, I have been intimately involved in the planning efforts in Jackson County and Medford for over a decade. I participated extensively in the RPS process, eventually supporting Medford's adoption of that plan, and also supported the city's adoption of the UGBA Phase I GLUP map amendments.

I have been following Phase 2—including monitoring the technical analysis, reviewing publicly available documents, and meeting with staff and a number of property owners and their representatives. The following general comments are made with that background as context. They are divided by subject into comments regarding what the proposal looks like and how big the proposal is.

Joe Slaughter
March 3, 2015
Page 2 of 9

Overall the Staff Proposal appears to be technically sound

1000 Friends of Oregon monitors UGB expansion proposals across the state. With the exception of the amount of land (as described below), information that is currently publicly available suggests that the staff's technical analysis in this case has resulted in a fundamentally sound proposal from which to begin the public hearings process.

As noted in the Housing Element of 2010,¹ Medford has already adopted a number of policies that result in increasing the efficiency with which the city uses land. Those policies, combined with the GLUP designation changes that occurred during Phase I of this project, form a solid basis from which to evaluate the future needs of the city.

The technical analysis that was performed in the fall of 2014 provided good information for ranking the relative merits of urban reserve areas and allowed objective comparison between them.² The resulting pattern of areas to include in the current expansion proposal appears to have correctly removed a number of areas from consideration this round due to lack of proximity to existing UGB areas and the expense of providing water, sewer and transportation infrastructure that would be needed to serve those areas.

The proposal being forwarded to the Planning Commission can provide a number of benefits to the community, including:

- Spreading the development around geographically also spreads the impacts that concentrated growth could have if it were concentrated in a few areas or regions of the city.
- Spreading the types and locations of land available increases the options for the city and helps meet diverse needs. More types of land increase the likelihood that needs identified in supporting documents, such as the need to provide more affordable housing noted in the Housing Element,³ can be met. Spreading the ownership of land increases the variety of building that can be expected, and decreases the chances that a small number of property owners can control land prices or the pace of development.
- Including more areas that are spread around the city and for the most part directly adjacent to existing built areas decreases the amount of land that is farther away from existing services, thus decreasing the cost to developers and the city of extending utilities and services into new development.
- Over the long term, keeping development closer to the existing utilities and services that already reach the edges of the existing UGB will prove to be the fiscally

¹ Medford Comprehensive Plan, Housing Element, pages 3-8.

² Information regarding this analysis and the resultant rankings is available at <http://www.ci.medford.or.us/Page.asp?NavID=2140>

³ The Housing Element identified a current shortage of 4,450 housing units affordable for existing households in Medford at page 44. In order to comply with Statewide Planning Goal 10 and Medford's own Comprehensive Plan, Medford's UGB proposal must include measures for addressing the current and future affordable housing needs. The GLUP redesignation in Phase I of this process could meet part of that need. The dispersed pattern for expansion in the staff's proposal could be argued to help meet that need as well.

Joe Slaughter
March 3, 2015
Page 3 of 9

conservative approach to new development, as the city will be on the hook for operations and maintenance of facilities that the current tax base cannot support. This, combined with Medford's changes to GLUP designations within the existing UGB during Phase I, will likely save the city millions of dollars in the future.⁴

Overall, the technical analysis supporting the shape and location of lands suggested for inclusion in the UGB expansion appears sound and has produced a good proposal for starting the public hearings process.

However, the amount of land within the proposal will need to be scaled back in order to comply with applicable requirements.

There is reason to question the stated amount of land needed

The purpose of an urban growth boundary assessment is to ensure that a city has enough developable land to accommodate 20-years of projected population growth.⁵ The city assesses the capacity of undeveloped or redevelopable land within its boundaries and has the option to either 1) change the proposed uses of those lands to increase efficiency, 2) add more land, or 3) take a combined approach, to make sure its projected needs can be met.

Medford is choosing option 3. After making adjustments to increase the efficiency of the planned uses of lands already in the UGB, the city has calculated additional needs.

Medford also has urban reserves, which when combined with the undeveloped or redevelopable land within its current UGB are meant to represent a 50-year supply of land. According to the Regional Plan Element of the Medford Comprehensive Plan, Medford's current UGB contains about 2,592 acres of available land designated for residential use and another 1,054 acres of available land for employment use, for a total of about 3,646 acres of land available to help meet future needs.⁶ In addition, during RPS the city added about 4,194 acres of land for residential and employment needs to their urban reserve areas.⁷

Thus, Medford has within its current UGB and its urban reserve areas about 7,840 acres of available land to meet its 50 year projected need.⁸ A full 20-year UGB might reasonably be expected to contain about 40 percent of that total number of acres. (20/50 years = 40%)

⁴ See Attachment A, excerpt from "More Extensive is More Expensive, for case studies suggesting the magnitude of this savings. For the full report, see www.friends.org/infrastructure.

⁵ In addition to being good policy for accommodating future population increases, ORS 197.296 requires that cities maintain a 20 year supply of developable land within its UGB. State law also mandates that the UGB contain no more than a 20 year supply.

⁶ Medford Comprehensive Plan, Regional Element, Figure 3.1-1.

⁷ Medford Comprehensive Plan, Regional Element, Figure 3.1-1.

⁸ The urban reserves also contained 1,877 acres of land within Chrissey and Prescott Parks, which are proposed to be included in the current UGB expansion. We have no objection to that land being included in the UGB, and it is not included in the calculations here or elsewhere in this testimony unless specifically stated otherwise.

Joe Slaughter
March 3, 2015
Page 4 of 9

A simple check shows that the current proposal includes substantially more than that. As noted above, the current UGB includes about 3,646 acres of available land. ALL of that must be included in these calculations. According to the city's website, the current proposal includes about 1,669 acres of urban reserve for inclusion in the UGB.⁹ This totals 5,315 total acres, or about 68 percent of the total available land in the existing UGB and urban reserves. This is far more than any reasonable margin of error, and absent explanation suggests that there is more land in the current proposal than can reasonably be justified. If the total amount of land cannot be justified, some will have to be removed from the proposal.

It turns out, as will be discussed below, that there are some errors in the documents that provided the base assumptions that the staff calculations are based on that have resulted in an overstatement of the number of acres needed in the expansion areas. These errors should be remedied early in the public process so that expectations regarding how much land can reasonably be included in the proposal remain realistic.

Comments Arising From Review of the Staff Proposal

A UGB evaluation (and, if necessary, expansion) is supported by a number of required elements. The entire enterprise is based on a population forecast. (Medford's forecast for this project was adopted locally in 2007). The city then must inventory the lands available within its existing UGB. (The Buildable Lands Inventory was adopted locally in 2008.) The city then conducts a needs assessment for land to accommodate projected employment (Economic Element, adopted locally in 2008) and housing needs (Housing Element, adopted locally in 2010). These documents contain the data and assumptions that go into determining the amount of land to be included in a UGB expansion.

Normally all of these elements are a part of the UGB expansion proposal that is sent to the state for approval, or "acknowledgment." The UGB expansion proposal must be consistent with those foundation documents.

In this case, Medford sought acknowledgement of some of these documents prior to completing the entire process. When the Housing Element was submitted, DLCD rejected it as incomplete.¹⁰ That document, at a minimum, will be subject to review by the state when this process is completed locally. That process makes sense: sometimes the ramifications of assumptions in these foundation documents are not clear until it can be seen how they will impact the later UGB expansion proposal—whether that result is due to faulty internal assumptions or conflicts with other foundation documents. In this case, there are problems both within the Housing Element and between that document and the Economic Element that

⁹ <http://www.ci.medford.or.us/Page.asp?NavID=2140>

¹⁰ See Attachment B, letter from Richard Whitman, Director, to Jim Huber, Planning Director, January 5, 2011.

Joe Slaughter
March 3, 2015
Page 5 of 9

result in double-counting of land need, and thus an overstatement of the number of acres to be included in the proposal.¹¹ Those problems, and their ramifications, are discussed below.

It should be noted that these comments are based on documents that are currently available for public review. It is anticipated that other issues may become apparent when the staff report and supporting documentation become available for public review (which we understand will happen when the packet containing this letter is sent to the Planning Commission for their hearing). We will continue to monitor information as it becomes available and will comment as appropriate.

For the time being we offer the following observations and suggestions.

Unbuildable land was improperly excluded from consideration in parks and open spaces, resulting in overstated land needs

The land needed to meet future housing and employment needs must be land that can be built on—i.e., it cannot be on excessively steep slopes, in floodways, or in certain riparian corridors. It is reasonable to add additional acres to a proposal to meet these needs when unbuildable land is intermingled with the land being considered for inclusion.

However, parks and open-space areas routinely include unbuildable land. The Bear Creek Greenway is a local example.

In the current proposal, 402 acres of land within urban reserve areas were identified as “already developed or unbuildable” and removed from consideration prior to calculating all land needs. The result was that 402 acres of additional buildable land were added to meet the stated needs. That is appropriate in the case of land that will be used for residential or employment uses.¹² However, there is unbuildable land in the proposal that is already identified to be used for parks and open space, so that portion of the 402 acres should not be offset by adding more buildable land. Examples of this appear to include ponds and riparian corridors that are identified to be part of parks or greenways.

UGB proposals have been remanded by LUBA for double-counting the amount of parkland needed due to the assumption that parkland must be buildable.¹³

To the extent that buildable land was added to the proposal to meet park needs that will clearly be met on unbuildable lands, that excessive buildable land should be removed from the proposal.

¹¹ DLCD has made it clear to the city on numerous occasions that all of the foundation documents are subject to review when the city sends the entire UGB package to the state for acknowledgement. A local argument has been developed that, once acknowledged, those documents are not subject to review again. We disagree. Regardless, the Housing Element has clearly NOT been acknowledged, and is subject to question in this process.

¹² It is also reasonable for land that is truly developed and not expected to redevelop during the 20 year period.

¹³ For example, see *Friends of Yamhill County vs City of Newberg*, LUBA No. 2010-034, p. 5, where Newberg’s UGB proposal was remanded in part because of this assumption and the resulting over-estimate of land included in the city’s proposal.

Joe Slaughter
March 3, 2015
Page 6 of 9

Additional needs were miscalculated in the Housing Element, resulting in overstated land needs

Future land needs for the city include space for churches, schools, parks and streets. In Medford schools, parks, churches and some limited other uses are generally built on land zoned for residential purposes. Thus it is reasonable to add land to the residential land needs to meet those needs.

OAR 660-024-0040(10) allows cities to assume that these needs (including streets, but excluding churches) will require an amount of land equal to an additional 25 percent of the land needed for future residential needs. As a safe harbor cities can add that land to their land needs without explanation. Cities can assume a different amount, but that amount must then be justified.

Table 39 of Medford's Housing Element shows a need for 455 net acres for housing and an additional 98 acres (or 21 percent) for streets and roads.¹⁴

The Housing Element then goes on to assert an additional need of 426 acres for parks, schools, churches, and other uses including fraternal organizations and government. Thus, including the 98 acres for streets and roads already included in the housing needs, the Housing Element asserts an additional need of more than 100 percent of the amount of land needed for residential purposes to meet "other land needs" in the residential zone.

The Housing Element does not address why this excess over the safe-harbor assumption is reasonable. It appears to be calculated and justified based solely on replicating the current ratio of all of these uses against the population. (17.0 acres per 1,000 people.)¹⁵

There are a number of problems with these calculations, including the following:

The need for parkland mistakenly includes land to offset the development of an existing golf course

Golf courses in Medford are generally on land zoned for residential use. As such, the land is counted in Medford's inventory of residential land, and is available for conversion to residential purposes at any time.¹⁶ The recent history with Cedar Links illustrates this possibility.

The asserted need for parkland must be consistent with another city plan: The Parks (or in the case of Medford the "Leisure Services") Plan. This consistency includes both the amount of land and the types of facilities that the city has identified. Golf courses are not included in the Leisure Services plan as an identified need that is presumed for the city.

¹⁴ Stated as 455 "net" acres and 533 "gross" acres. In this case gross acres includes the land needed for housing and the streets to connect it all.

¹⁵ Medford Comprehensive Plan, Housing Element, p. 63.

¹⁶ It is our understanding that the one exception to this is the Country Club, which has an open-space assessment and is thus considered "unbuildable" land.

Joe Slaughter
March 3, 2015
Page 7 of 9

The development of residential land that happens to be currently used as a golf course (as opposed to being farmed, or sitting vacant) cannot be offset by a claimed need for more of the same (or, in this case, additional privately owned and operated recreation space included counted in the parks and open-space land needs). It is residential land that is being developed for that purpose.

The Housing Element wrongly asserts a need to add land to the residential land needs to offset this development.¹⁷ The part of the 426 acres of asserted need for "Other Residential Land Needs" that is attributable to the development of Cedar Links should be removed from the proposal.¹⁸

Some of the employment needs have been double-counted, resulting in overstated land needs

The Housing Element also asserts that 135 of the 426 acres are for city, county, state, federal, and "other public agency" lands. These facilities are generally not sited on land zoned for residential uses. (Think City Hall, County and state offices, courts, post offices, etc.)

These are also places of employment, and the land needs for them would presumably be captured in the needs identified in the Economic Element along with land needs for other employment categories.

In fact, in this case they are captured in the Economic Element as growth in the "Public Administration" sector.¹⁹ Additional land needs are reflected in the land need calculations for new office space.

Thus, land needs for these workers are double counted in the proposed plan: once in the Economic Element, and once in the Housing Element.

There are many reasons why the calculations in the Housing Element should be discarded in favor of those in the Economic Element, not least of which are the facts that

- It is extremely unlikely that there will be a need for an additional city hall, courthouse, federal building, etc., so calculating needs for government facilities based on current uses over-states the future need;
- The land need should be based on projected increase in employees working in this sector, which are calculated in the economic element; and

¹⁷ See p. 63.

¹⁸ The Housing Element appears to offset this loss somewhat with the presumed development of another private park (Howard Sports Park). To the extent that this private park is not included in the assumptions in the Leisure Services Plan its effect on land need calculations should also be eliminated from the proposal.

¹⁹ Medford Comprehensive Plan, Economic Element, Figure 14 and following.

Joe Slaughter
March 3, 2015
Page 8 of 9

- These uses will be placed on land zoned for employment, and should be calculated and included with the rest of the employment land needs.

The current proposal should be reduced by 135 acres to eliminate double-counting of these employment land needs.

Stated land needs in this category may still be excessive

Removing the effect of privately owned recreation facilities and government facilities leaves about 247 acres in the "Other Residential Land Needs" category. That, combined with the 98 acres already included for streets, still exceeds the safe harbor of 25 percent by a significant amount. It is not possible with the information available now to determine whether this can be justified or not. It should be noted that 44 of those acres are for "fraternal organizations." It is not clear to what extent those facilities are located on residential land, may or may not be captured in employment calculations, or will need the same amount of land per 1000 people in the future as they have in the past. Further work is needed to address this issue.

Additional land may have been included in the "unbuildable" category improperly

It is our understanding that the 402 acres of "built or unbuildable" land mentioned above may include approximately 120 acres of land that currently consists of the fairways at Centennial Golf Club. If that is the case then one of two options can be exercised:

- The acres that Centennial does not plan to develop may be eligible to come into the UGB as "unbuildable land" provided they have the "open space assessment" placed on them (as we understand the Country Club land does).
- If the land does not come into the UGB with the "open space assessment," it comes in as buildable land and is counted against the land that is being included to meet future housing needs (as is the case with other golf courses in the region with the exception of the Country Club). If that is the case, an equivalent number of acres will have to be removed from the proposal's asserted residential land needs, as they will become excessive.

At this time we do not have a preference as to which approach is followed.

Conclusions and Recommendations

As noted above, based on information that is currently available for public review, we find that the shape of the staff proposal is based on a generally sound technical analysis that has resulted in a fundamentally sound proposal from which to begin the public hearings process.

What problems we have identified to date are related to the amount of land in the proposal. With the one exception of the assumption that all parkland must be buildable land, the cause of

Joe Slaughter
March 3, 2015
Page 9 of 9

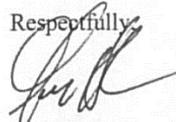
this issue appears to be errors in or conflicts between the foundation documents (elements of the Comprehensive Plan) that must be relied on in a UGB evaluation.

At this point we recommend that the Planning Commission fix those errors and remove their effects on the proposal before sending a recommendation to the City Council.

We also recommend that if the Planning Commission is going to consider adding any areas that are not in the current proposal you carefully consider the net impacts that those additions (along with the required subtractions to keep the proposal from exceeding what can be justified) will have on the future of the city.

Please place these comments in the record and notify me at the Grants Pass address above of any decisions or future hearings or meetings on this subject.

Respectfully,



Greg Holmes
Southern Oregon Planning Advocate
1000 Friends of Oregon

CC: Josh LeBombard, DLCD

MORE EXTENSIVE IS MORE EXPENSIVE



How Sprawl Infrastructure Bankrupts Oregon Communities, and What We Can Do About It

Oregon's physical infrastructure is an investment in the future of its residents and communities.

Unfortunately, many Oregon communities are making the wrong bets. They're falling behind on maintenance, taking on debt, and raising taxes to pay for it all.

Why is this happening? A big part of the answer is the shape of communities. Some development patterns create much higher public costs than others. Land-extensive sprawl costs a lot more for infrastructure than more efficient development, especially when total lifecycle costs are included.

But there is an alternative. Quality growth directs development into existing communities and creates walkable neighborhoods with mixed land uses and transportation options. At the same time, it saves communities millions. In these difficult fiscal times, quality growth is the best fiscal bet for Oregon's future.

Unfortunately, current Oregon law does not require cities to consider the full lifecycle costs of infrastructure when making growth decisions. It's time to change this. **By considering the full costs of infrastructure, we can hold leaders accountable and help communities step back from sprawl's fiscal edge.**

It's time to make a choice to transform how we make choices.
Read more within.

About this document

This document is a summary of key findings from our 2013 report, "More Extensive Is More Expensive," an analysis of sprawl-induced infrastructure costs and recommendations for what Oregon can do to address this growing problem.

Download the full version of this report at
www.friends.org/infrastructure



Photo: Jennifer Williams. Used with permission.



Photo: ODOT Creative Commons.



Photo: Brett D. Creative Commons.

By the numbers:

Sprawl, Infrastructure, and Oregon's Burden

\$10,000,000,000

Total of unfunded infrastructure maintenance through 2035 in the Portland Metro area, even without new growth. A total of \$27-41 billion will need to be spent before 2035 for projected future population and employment growth.

\$6000+

for every resident of the three-county region

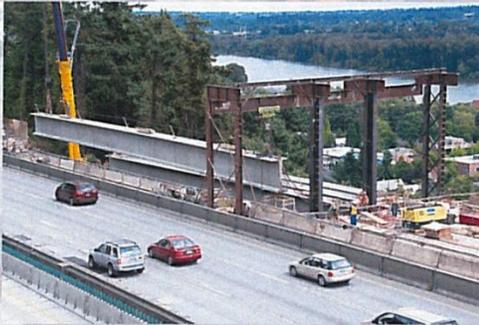


Photo: ©2017 Creative Commons

24%

Proportion of Oregon bridges that are deficient, along with 1,000+ schools and \$5.2 billion of repairs needed for Oregon water infrastructure—over \$1,300 per Oregon resident.

69%

Proportion of Oregon cities that expect property taxes to fall short of the cost of providing essential services. Cities need **\$187,000,000** in new revenue to meet current maintenance/construction needs.

19

Minimum number of local ballot measures that have asked Oregon voters to raise taxes on themselves to fund infrastructure maintenance or construction from 2010 through summer 2012. Of these, 11 passed.

*“Structurally, [Oregon] cities are unable to meet current and future demands for the services that are necessary to support service levels, road and public facility maintenance and population growth. **Cities are being slowly strangled.**”*

—League of Oregon Cities executive director Mike MacCauley, in a press release announcing an ECONorthwest study into Oregon infrastructure budgets



Photo: Ed Brinson Creative Commons

1000 FRIENDS OF OREGON

Background Photos: Rudy Salazar, Creative Commons

By the numbers:

The Quality Growth Difference

\$10,100,000,000

Total estimated savings for reducing sprawl and making more efficient use of urban land to accommodate 20-40 years of growth in the Austin region, according to a landmark "Envision Central Texas" report.



10:1

The ratio of per-acre property tax revenues for a retail store in a walkable area vs. a big box shopping center.



3,42

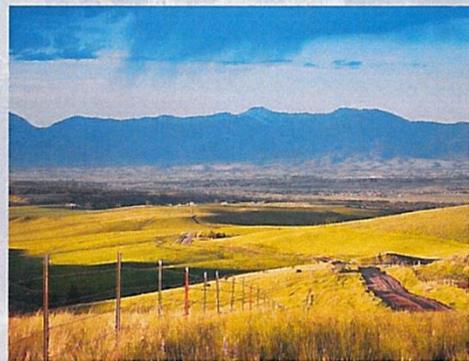
The number of years, respectively, for a 3.4 acre multifamily development in downtown Sarasota, Fla., and a traditional 30-acre subdivision, to produce enough tax revenue to cover the public's infrastructure investments.

72%

Road construction and maintenance savings in rural Gallatin County, Mont., through better land conservation versus rural sprawl. Gallatin County (below) has about the same population as Jackson County, Ore.

"Prudent land use policies that direct development into existing communities not only protect what is most special about the place... they also save taxpayer money, an especially crucial benefit given today's stretched budgets."

—The Sonoran Institute on the results of its scenario study for Gallatin County, Montana



MORE EXTENSIVE IS MORE EXPENSIVE
Download the full report at friends.org/infrastructure

Background Photo: Flickr.com/mr_1_in_jc. Creative Commons.

Back from the edge:

Oregon's Strategy for Fiscal Accountability

Oregonians have a choice. We can step back from the ledge of ravenous, sprawl-induced infrastructure spending. We can develop a strategy for filling our current holes (literal and financial) without digging any deeper.

How? **We propose that Oregon communities employ a tool known as Fiscal Impact Analysis to assess the full lifetime infrastructure costs incurred by different styles of development.**

When we look at the long-term costs of roads, sewers, water lines, and so on, the evidence is clear. More extensive infrastructure is more expensive infrastructure. Quality growth—focusing on existing communities, more efficiently using existing infrastructure, employing transportation options—is the cost-conservative choice.

We can begin today. Each time an Oregon city considers whether to expand its urban growth boundary to accommodate new population and employment growth, it should incorporate Fiscal Impact Analysis to understand the true obligations its growth decisions will create for future residents.

Citizens deserve to know the full costs of growth choices. And they expect their leaders to justify the costs of growth against other priorities like maintaining existing roads and sewers, rebuilding existing bridges, and modernizing existing schools.

The choice is clear. **If we can't afford the path we're on, it's time to come out of the woods.**

What you can do

- **Learn more.** Read the full version of this report at www.friends.org/infrastructure.
- **Share.** Pass this summary and/or the full report to others with an interest in the fiscal health of our communities—which, in reality, is all of us.
- **Advocate.** Send this report to your elected leaders, local officials, and other decision makers who make decisions that will impact your pocketbook. Ask them to consider the full costs of their growth decisions. Invite them to pursue a better choice.
- **Report.** Tell us about the infrastructure challenges facing your community. What are your concerns? What do you want to see changed? What has the sprawl burden done to your community? Send comments to craig@friends.org or write to us at the address below.



Download the full version of this report at www.friends.org/infrastructure.

1000 Friends of Oregon
133 SW 2nd Ave. #201 | Portland, OR 97204
(503) 497-1000 | www.friends.org
Support 1000 Friends: friends.org/support

Background Photo: Flickr user 10949, Creative Commons



Oregon

Theodore R. Kulongoski, Governor

Department of Land Conservation and Development

635 Capitol Street NE, Suite 150

Salem, Oregon 97301-2540

Phone: (503) 373-0050

Fax: (503) 378-5518

www.oregon.gov/LCD



January 5, 2011

Jim Huber, Community Development Director
City of Medford
Lausmann Annex
200 South Ivy Street
Medford, OR 97501

RE: Incomplete Submittal of Plan Amendment (Medford file no. CP-08-055; DLCDC file no. Medford PAPA 008-09)

Dear Mr. Huber:

On December 13, 2010, this department received a notice of adoption from Medford regarding an update of the Housing Element of the city's comprehensive plan. It appears the city has expended considerable effort and adopted a product that will help the city make prudent planning decisions. There are some procedural issues with the submittal that we wish to bring to your attention, however.

ORS 197.626 and OAR 660-025-0175 provide that urban growth boundary (UGB) amendments of over 50 acres for cities with a population of over 2,500 are reviewed by the Land Conservation and Development Commission (LCDC) in the manner of a periodic review task submittal. We are aware that the plan amendment adopted by the city does not itself amend the city's UGB. However, as explained below, we believe under current LCDC rules the city's action to update its Housing Element will be subject to review by LCDC when the city amends the UGB.

As you are aware, ORS 197.296, "factors to establish sufficiency of buildable lands within urban growth boundary; analysis and determination of residential housing patterns," applies to Medford's submittal. The city's submittal is subject to ORS 197.296 and statewide Goal 10, Housing, and Goal 14, Urbanization, and the administrative rules implementing those goals (see OAR 660-008-0005(4)(c)¹ with regards to the applicability of Goal 14).

These statute, goal and rule provisions interact in a manner that requires a city to address an identified need for additional residential land. That is, when the city identifies a need for

¹ (4) "Housing Needs Projection" refers to a local determination, justified in the plan, of the mix of housing types and densities that will be:

(a) Commensurate with the financial capabilities of present and future area residents of all income levels during the planning period;

(b) Consistent with any adopted regional housing standards, state statutes and Land Conservation and Development Commission administrative rules; and

(c) Consistent with Goal 14 requirements.

Jim Huber, City of Medford

January 5, 2011

additional land to accommodate growth over the next 20 years (996 total gross acres),² a sufficient quantity of land suitable to satisfy the need must be provided, either inside the current UGB or through a boundary amendment, or a combination of the two (ORS 197.296(6)). The determinations of need for housing and for residential land must be made together, as Medford has done, but OAR 660-008-0005(4), together with Goal 14, requires completion of the next step – addressing the need – as well.

Consideration of the city's housing needs, residential land need, and UGB capacity is one process. Since the adopted findings report a need for more than 50 acres to be added to the UGB, OAR 660-025-0175 is applicable and the submittal will be reviewed in the manner of periodic review when it is complete. Furthermore, OAR 660-025-0040(1) states that LCDC has exclusive jurisdiction in periodic review matters.

OAR 660-025-0130(2) states: "After receipt of a work task, the department must determine whether the submittal is complete." As explained above, the city's submittal is treated as a periodic review task, and the department has determined the submittal is incomplete because it does not accommodate the identified need for residential land. Furthermore, since this action is part of a UGB amendment, county concurrence with the amendment is required by Goal 14 (OAR 660-015-0000(14))³ and OAR 660-024-0020(2)⁴ which includes adoption of all supporting documents, i.e. Medford's Housing Element; since Jackson County has not co-adopted this amendment, the submittal is incomplete.

Finally, the notice of adoption of a decision to be reviewed in the manner of periodic review must be provided as specified in OAR 660-025-0140. Since the city has not provided this notice, the department must return the submittal on these grounds, as well.

If you have any questions please feel free to contact me at (503) 373-0050 ext. 280, or Ed Moore, your regional representative, at (971) 239-9453 or ed.w.moore@state.or.us.

Yours truly,



Richard Whitman
Director

cc: Kelly Madding, Jackson County Development Services Director (email)
DLCD Staff (email)

² City of Medford Comprehensive Plan Housing Element, Draft of September 10, 2010, page vii.

³ An urban growth boundary and amendments to the boundary shall be adopted by all cities within the boundary and by the county or counties within which the boundary is located.

⁴ The UGB and amendments to the UGB must be shown on the city and county plan and zone maps at a scale sufficient to determine which particular lots or parcels are included in the UGB. Where a UGB does not follow lot or parcel lines, the map must provide sufficient information to determine the precise UGB location.

APPENDIX D. Excessive Land**MEMORANDUM**

SUBJECT — Evaluation of excessive land need arguments

FILE NO. — CP 14 114

TO — Planning Commission

FROM — John Adam, Senior Planner, and Joe Slaughter, Planner IV

DATE — May 6, 2015 *for 5 14 2015 meeting***INTRODUCTION**

The Planning Commission requested at its April 6, 2015 special study session that staff provide an analysis of the arguments in a letter from Greg Holmes of 1000 Friends of Oregon²⁴, dated March 3, 2015, that challenges some of the City's land need assumptions.

OVERLAP — PARKS AND "UNBUILDABLE"**Explanation**

~~The 1000 Friends letter charges that unbuildable land was improperly excluded from open space consideration (p. 357). The problem is that some of the land classified as "unbuildable" in staff's capacity analysis can be classified as usable "open space." For example, a riparian corridor may be part of a park or a trail system; on one hand it is unbuildable, on the other it is a component of a recreational use. Because of this overlap, some "unbuildable" acreage should be counted as usable "vacant" land.~~

Analysis

~~The assertion that a portion of the City's identified park need should be shown as being met on acreage that has been classified as unbuildable assumes that unbuildable lands will be available for park facilities development. The City does not own any of the land that has been identified as unbuildable in the capacity analysis for the urban reserve. In order for this land to meet any portion of the identified park need the City would have to purchase or otherwise acquire the land.~~

~~The City of Newberg's UGBA was remanded in part because the city did not show an overlap between unbuildable land and identified park needs. In that case the City of Newberg classified at least a portion of the land within the floodplain as unbuildable.~~

²⁴ — See 3/12/2015 Planning Commission packet, pp. 353–67.

~~The court determined that some of the park needs, including sports fields, could be expected to be met within the floodplain. Because of this, Newberg should have counted a portion of its park land need as being met within the unbuildable lands, specifically within the floodplain. For the Medford UGBA, however, staff did not classify any floodplain as “undevelopable.”~~

~~Floodplains have certain development standards that must be adhered to when developed, but because these areas are developable when those standards are met, they have not been counted as unbuildable in the capacity analysis for the urban reserve. Since all of the floodplain, unless it is within a riparian corridor or an identified wetland, is counted as buildable, the circumstances of the Newberg case do not apply to Medford’s proposal.~~

~~Even if the City chose to say that a portion of the park need would be met on the unbuildable acreage being included in the UGB, there is no way to determine how large this overlap should be. Will all trail development occur within riparian corridors, steep slopes, and wetlands? Any acreage value one assigned would only be a guess and therefore could easily be challenged as being either too large or too small. It probably cannot be more than one or two dozen acres.~~

~~The methodology used for the capacity analysis for the urban reserve was consistent with the methodology used for the buildable lands inventory and consistent with OAR 660-024-0050 and ORS 197.186 and 197.296. The capacity analysis did not count anything as unbuildable that was not supported by state statute but may have undercounted the unbuildable acreage by not counting any portion of the floodplain as unbuildable. For these reasons, staff believes the separation of the unbuildable acres and the identified park need is appropriate and will help to insure that an adequate supply of developable land will be available for needed park and recreation development for the 20-year period.~~

EXCESS OF “OTHER LAND NEEDS”

Explanation

~~The 1000 Friends letter also points out that cities may use a regulatory “safe harbor” net to gross factor of 25 percent for housing (net x 1.25). The purpose of this factor is to add acres to the net need for rights-of-way, parks, and schools²². The letter says that the Housing Element used a net to gross factor greater than 100 percent (net x 2.00). It concludes that the Element does not justify using a figure so much in excess of the safe harbor.~~

²²—OAR 660-024-0040 (10).

Appendix D: Excessive Land

~~A response letter from Michael Savage, CSA Planning²³, dated March 26, 2015, states that Medford, as a city with a population greater than 25,000, cannot use the safe harbor method. However, staff can find nothing in the OAR that prohibited the City from using the safe harbor if it had chosen to do so.~~

Analysis

~~The safe harbor was not used by the consultants who performed the housing needs analysis. Instead, for rights-of-way they analyzed existing development to determine typical net-to-gross factors for various densities²⁴, and applied those proportionally. For parks and schools the consultants determined the existing supply ratios (in acres per thousand people), and adjusted those ratios downward for the next 20 years to accommodate an expected 35,591 new inhabitants²⁵.~~

~~The resulting additional land need is in the following table. The middle column shows the acres needed by type to serve residential development. The rightmost column shows the percentage over net need for each type and in total.~~

Type	Acres	Percent over Net Land Need
Rights-of-way	98	22%
Parks	153	34%
Schools	20	4%
Total	271	60%

~~However, the amounts are adjusted downward by adding in additional supply: 19 acres for parks and 26 acres for schools.~~

Type	Acres	Percent over Net Land Need
Rights-of-way	98	22%
Parks	134	30%
Schools	=	0%
Total	232	51%

~~Note the difference between the 1000 Friends argument and the figures above. The letter compares 524 acres²⁶ to 455 acres. It errs in summing all those acres because it is not comparing the same categories.~~

²³—See 4/6/2015 study session packet, pp. 83–84

²⁴—See Table 37 in Housing Element

²⁵—See p. 10 in Housing Element

²⁶—524 acres = “public & semi-public” + rights-of-way (426+98).

~~The regulatory safe harbor comprises only three land use categories: rights of way, parks, and schools. In a comparison of just those three types the Housing Element's calculation results in a net to gross factor that is double the Administrative Rule amount (51% versus 25%). The figure is undeniably much larger than the safe harbor amount, but nonetheless it is based on an analysis of what has been built in existing residential areas, and it makes the correct move of reducing the provision ratios for parks and schools²⁷.~~

~~The amount of land used by streets, schools, and parks can vary widely from community to community, but in staff's experience the percentage taken up by streets alone is usually around 20 percent, so the OAR's safe harbor appears parsimonious. The City's figure was derived rationally and is a reasonable estimate of need.~~

~~PARKLAND/GOLF COURSE OFFSET~~

Explanation

~~The 1000 Friends letter argues (pp. 358–59) that Cedar Links was erroneously included in Table 40 of the Housing Element as lost open space, whereas it is not listed as a resource in the City's Leisure Services Plan (2006). The Housing Element states (p. 63) that the loss of Cedar Links will be partially offset by the development of the 58-acre Howard Sports Park, also privately owned, resulting in a net loss of 44 acres of open space. Mr. Holmes argues that those acres should be removed from the need.~~

Analysis

~~Pages 63–64 and Table 40 in the Housing Element have a curious feature that factors into this question: the stated need for schools is 20 acres, but that is only for the Medford School District. The Phoenix-Talent School District has a supply of 26 undeveloped acres, but its need is unstated. Presuming their need equals their supply, the "Estimated Need" column of Table 40 should show a combined 46-acre need for schools instead of just 20 for Medford School District.~~

~~The 1000 Friends letter is correct in its argument, but the offset of 26 acres for schools should also be factored in, leaving an excess acreage in Table 40 of 18 acres.~~

~~DOUBLE COUNTING~~

Explanation

~~The 1000 Friends letter also asserts (pp. 359–60) that the land needed for "government" (also called "public administration") was accounted for in two places: once in the Eco-~~

²⁷—Housing Element, table 40. Parks were reduced from 6.8 to 4.3 per thousand. Schools were reduced from 3.4 to 0.6 per thousand. The rationales for the reductions are explained on p. 63.

conomic Element and again in the Housing Element. The letter also argues that the analysis in the Economic Element is superior to that in the Housing Element. The excess amount is 135 acres.

The CSA letter (noted above) counters that the Housing Element has de facto approval from the Department of Land Conservation and Development (DLCD) and therefore cannot be changed. It also points out that some of the most extensive land users are schools, which are always located on residential land.

Analysis

The Economic Element says the City will add 908 new jobs for “Public Administration.” At a rate of 37.9 jobs per net acre this results in a need for 30 gross acres²⁸. The Housing Element says Medford needs 135 acres for “Government” uses in the expansion area²⁹. The same need category, in other words, is counted in both elements. One of the two estimates should be eliminated unless it or both can be justified.

The 1000 Friends letter gives three major reasons why the Economic Element’s estimate is superior: (1) the Housing Element shows that the government land need does not diminish in the future but inexplicably continues to grow in lockstep with population growth; (2) the Economic Element appropriately ties land need to projected employees per acre in the “public administration” industrial category; (3) most of the government uses will be sited on land zoned for employment.

Staff agrees with 1000 Friends on the first two points, but not entirely on the third.

First, the City, County, State, and Federal governments will not need the same ratio of land to population unless they need to duplicate all current services. Like other kinds of infrastructure, once the basic facilities are in place they can be augmented or expanded in response to growing demand, but not duplicated.

Second, the Economic Element calculated employment land needs using common allocations—space per employee, floor area ratio, building type distributions—by industrial classification. It is tied to estimated employment numbers, which in turn are based on population projections. This is a more precise and finer level of analysis than can be achieved by estimating land need for government uses by using “acres per thousand people” and applying (or not) a reduction factor.

²⁸—Derived from Economic Element, *Fig. 14*, and an unlabeled table in the middle of p. 24, and the net to gross conversion factor of 1.25 from p. 45. However, the *Technical Appendix C* of the *Economic Opportunities Analysis* projects a “Government” office space need of 20.4 acres. *Technical Appendix G* shows that “Government” has no industrial space needs, such as for warehousing, but those types would be captured in other appropriate categories, as per NAICS guidelines, so it is difficult to prise out how much land is estimated for all government needs in the Economic Element, but it is certainly more than 30 acres.

²⁹—See Housing Element, p. 63, and Table 40. The 135 acres is made up of 64 acres for City, 17 acres for County, 22 acres for State, 12 acres for Federal, and 20 for other public agencies

Third, residential zoning districts permit “institutional uses” conditionally³⁰, which include government offices, fire stations, convention or community centers, auditoriums, post offices, schools and colleges, libraries, museums, utilities, park and ride lots, churches, facilities for organizations and clubs, and cemeteries. Therefore, Mr. Holmes’s point that government uses will be placed on land that is zoned for employment is not entirely correct. But neither is it too far from the mark.

The difficulty in sorting this out is the partially overlapping smorgasbord of terms in the various documents being compared. Take schools, for example:

Where it is ————— What it says

Municipal Code ————— Schools are included in the definition “institutional use.” Until recently they were permitted in only residential districts.

Housing Element ————— Schools are a separate category from the City, County, State, and Federal lands under the umbrella term “public and semi-public land,” so it does not contribute to the purported excess.

Economic Element ————— The North American Industrial Classification System (NAICS) category “Public Administration” (Sector 92) contains only the office uses related to public administration. All other government activities, such as schools, utilities, transportation and warehousing, and utilities are classified in other industrial sectors.

The only use permitted as an “institutional use” in residential zoning districts *and* that is common to both Elements is “government offices.” Other government uses that fall under “institutional” are fire stations and some utilities. So while it is true that some government uses will locate in residential districts, the essential question here is: How plausible is it that the City will need 135 acres in the residential category to accommodate a couple of new fire stations, some land for utilities, and government offices?

The CSA counter-argument that the City has a de facto approval of the Housing Element from the Department of Land Conservation and Development (DLCD) is not compelling. It requires pretending that DLCD will not scrutinize and question every one of the foundation documents that establish Medford’s land need.

When the City submitted its adopted Housing Element for approval in 2010, DLCD countered with a letter saying the submittal was incomplete, that a declaration of land need requires a response. The Department therefore did not approve the Housing Element, saying that foundation documents³¹ establishing need, plus the boundary and code amendments that meet the need, together constitute a complete urban growth bound-

³⁰ Medford Municipal Code, §10.010 (definition) and §10.314, table 6.

³¹ The foundation documents are: Buildable Lands Inventory; Population Element; Housing Element; Economic Element

ary amendment project—everything together, not in pieces. The rub here is that no constituent part of that project is free from scrutiny and possible challenge. This standpoint requires cities to work for years building a case before finding out if their UGBA gains approval at the State level. It is an unnerving position for cities to be in, but it is the reality in which we now operate. If the Economic Element, which was approved by the State in 2009, is not safe from inquiry, then an element that allegedly has de facto approval certainly is not.

The CSA letter also proposes that the foundation documents, once adopted, are immutable, yet the City already adjusted those same land need figures through Phase 1 of the UGB Amendment project when it changed the land use characteristics of 500 acres inside the current urban area³². Phase 1 was a partial response to employment and residential land need. Refining the details is inevitable in such a large and complex process as an urban growth boundary amendment because new information is always coming forward.

The letter also lumps in “Schools” with the government land need although it does not constitute part of the purported excess; pointing out that schools are extensive land users is therefore not relevant. Even if it were, Table 40 in the Housing Element shows only a 20-acre need for the next twenty years.

In the absence of a reasonable explanation why the City needs 135 acres for government uses in the residential category, staff concurs with the charge that it should be removed. However, given the correct observation above that governmental land uses can occur in most zoning districts, perhaps the City should have some “flexible acres” within the overall land need that it can allocate between employment and residential categories as the boundary expansion proposal becomes finalized. It would be useful as a means to “fine tune” the final expansion. Perhaps a few dozen acres would be a reasonable amount.

SUMMARY

Of the various charges of land excess in the 1000 Friends letter, staff believes that the City correctly calculated unbuildable lands and the land need for rights-of-way, parks, and schools. However, staff must concur that the private park land need was erroneously included, and that the government land need was double-counted; respectively, 18 acres and 135 acres should be removed. With the addition of 22 acres owned by OSU that has to be reclassified as “vacant” in the UGBA capacity analysis, staff advises that the Planning Commission **remove 175 acres** from the expansion proposal.

³²—The City asked for and was given acknowledgement of the Phase 1 changes because several land owners were eager to rezone and develop their land under the new designations.

APPENDIX E. UGBA PHASE 1 EFFECT ON LAND SUPPLY

Urban Growth Boundary Amendment (UGBA) Phase 1 (ISA GLUP Amendment) sought to change the General Land Use Plan (GLUP) designation of land in the existing urban area for the purpose of increasing its development capacity in order to accommodate some of the City's projected need for residential and employment land. The outcome of UGBA Phase 1 was the Selected Amendment Locations (SALs). This changed the land supply and need totals.

The Housing Element categorizes available residential land into three categories: Vacant, Partially Vacant, and Redevelopable. A capacity analysis was completed for the properties included in UGBA Phase 1 and the number of developable acres was determined for each of those properties. For residential land types these acres were also classified as Redevelopable, Partially Redevelopable, or Vacant based on the analysis from the Housing Element. Table 4.1 provides a tabulation of the gains and losses in each of the three categories, for each of the three residential GLUP types, from UGBA Phase 1. The available land supply from the Housing Element was changed based on these numbers in order to account for UGBA Phase 1's effect on the residential land supply.

Table 4.2 shows the effect of UGBA Phase 1 on all GLUP designations. The supply of employment GLUP types from the Economic Element were changed based on these numbers.

Appendix E: UGBA Phase 1 Effect on Land Supply

Table 4.1. UGBA Phase 1 Effect on Residential Land Supply by Availability Type in Acres (adapted from Ordinance no. 2014-154, Exhibit A, SAL Capacity Analysis)

Rdv = Redevelopable, Vac = Vacant, and PDR = Partially Redevelopable

	UR Rdv Gain	UR Vac Gain	UR PDR Gain
Total	215a-ur 0.1 0.1		

	UH Rdv Gain	UH Vac Gain	UH PDR Gain
	215c-uh 3.8	510b-uh 6.2	630a-uh 0.1
	510b-uh 0.2	510b-uh 0.4	630a-uh 2.0
	510b-uh 0.2	640b-uh 0.6	630a-uh 0.8
	540b-uh 19.4	640b-uh 1.8	630a-uh 1.4
	540b-uh 0.3	640b-uh 0.3	640b-uh 4.8
	630a-uh 1.2	670b-uh 2.9	640b-uh 0.7
	640b-uh 0.3		640b-uh 1.7
	640b-uh 0.3		640b-uh 0.9
	640b-uh 0.4		670b-uh 1.2
	640b-uh 0.5		670b-uh 1.1
	640b-uh 4.2		
	670b-uh 0.2		
	718a-uh 5.3		
Total	36.3	12.2	14.7

	UM Rdv Gain	UM Vac Gain	UM PDR Gain
	540b-um 10.1	213a-um 2.6	212a-um 1.0
	540b-um 10.8	213b-um 4.1	212a-um 1.5
	540b-um 0.2	630b-um 1.1	212b-um 4.5
	630b-um 1.4	630b-um 0.6	540d-um 1.5
	630b-um 0.6		630b-um 1.1
	630b-um 0.3		630b-um 1.6
	630b-um 1.0		630b-um 0.3
	630b-um 1.0		630b-um 0.9
	630b-um 1.3		630b-um 0.8
	630b-um 0.3		630b-um 1.2
	630b-um 0.4		630b-um 1.0
	630b-um 0.3		630b-um 1.0
	670a-um 1.1		640a-um 2.2
	930a-um 4.8		640a-um 4.8
	930c-um 6.6		
Total	40.2	8.4	23.4

UH Rdv Loss		UH Vac Loss		UH PDR Loss	
740a-cm	0.4	320a-cm	3.8		
		960a-sc	0.7		
		960a-sc	1.6		
Total	0.4		6.1		

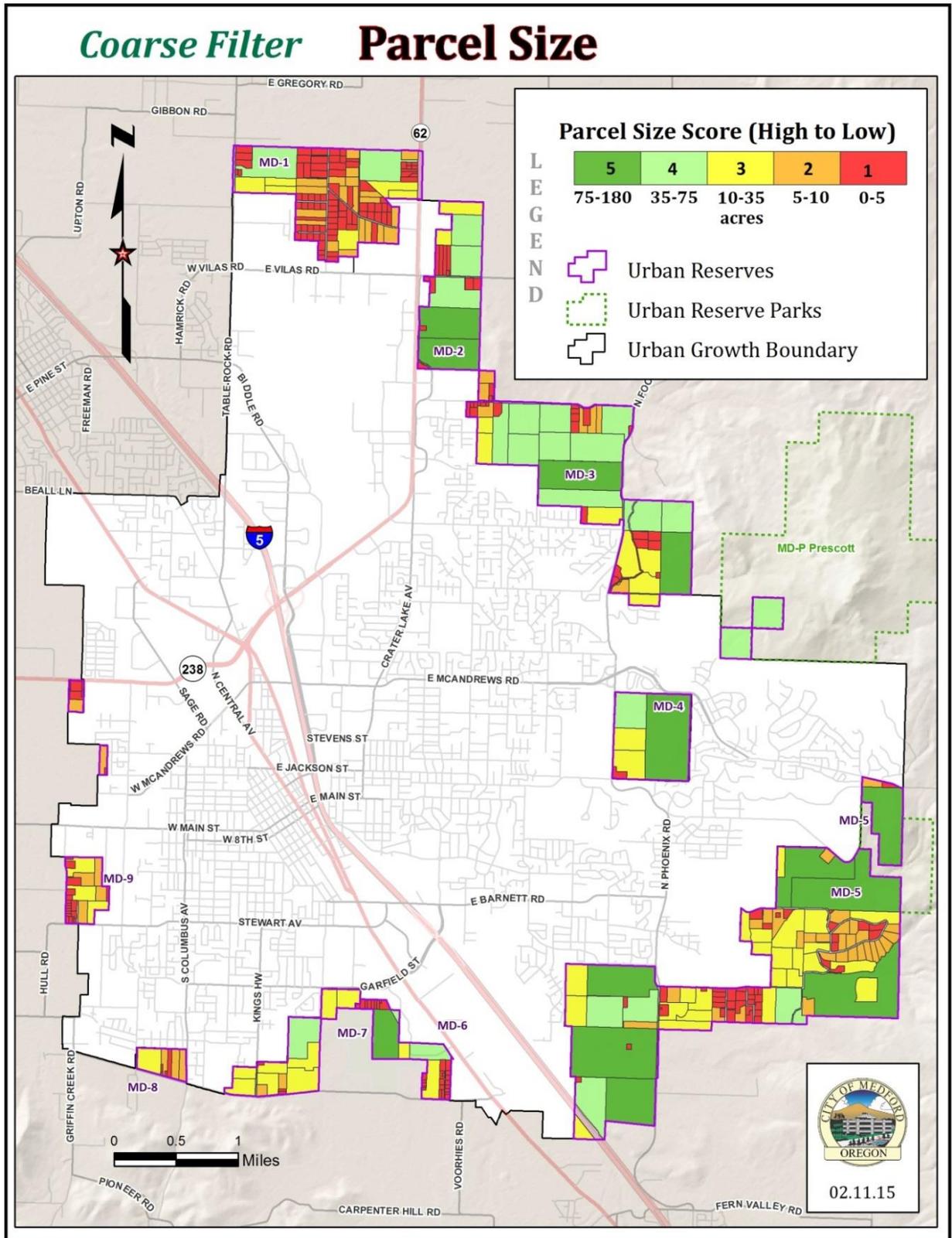
UR Rdv Loss		UR Vac Loss		UR PDR Loss	
510b-uh	0.2	213a-um	2.6	212a-um	1.0
510b-uh	0.2	213b-um	4.1	212a-um	1.5
540b-um	10.1	510b-uh	6.2	212b-um	4.5
540b-um	10.8	510b-uh	0.4	540d-um	1.5
540b-um	0.2	630b-um	1.1	630a-uh	0.1
540b-uh	19.4	630b-um	0.6	630a-uh	2.0
540b-uh	0.3	640b-uh	0.6	630a-uh	0.8
630b-um	0.3	640b-uh	1.8	630a-uh	1.4
630a-uh	1.2	640b-uh	0.3	630b-um	1.1
630b-um	1.4	670b-uh	2.9	630b-um	1.6
630b-um	0.6	510a-cm	11.1	630b-um	0.9
630b-um	0.3	718b-cm	1.8	630b-um	0.8
630b-um	1.0	718b-cm	0.5	630b-um	1.2
630b-um	1.0			630b-um	1.0
630b-um	1.3			630b-um	1.0
630b-um	0.3			640a-um	2.2
630b-um	0.4			640a-um	4.8
630b-um	0.3			640b-uh	4.8
640b-uh	0.3			640b-uh	0.7
640b-uh	0.3			640b-uh	1.7
640b-uh	0.4			640b-uh	0.9
640b-uh	0.5			670b-uh	1.2
640b-uh	4.2			670b-uh	1.1
670a-um	1.1			217a-cm	2.7
670b-uh	0.2			217b-cm	1.5
718a-uh	5.3			640c-cm	1.7
930a-um	4.8			640c-cm	1.1
930c-um	6.6			718b-cm	2.3
680a-cm	1.2				
680a-cm	0.3				
930b-cm	9.1				
930d-cm	4.3				
930d-cm	1.3				
Total	89.2		34.0		47.1

Appendix E: UGBA Phase 1 Effect on Land Supply

Table 4.2. UGBA Phase 1 Effect on Land Need by GLUP Designation in Acres (adapted from Ordinance no. 2014-154, Exhibit A, SAL Capacity Analysis)

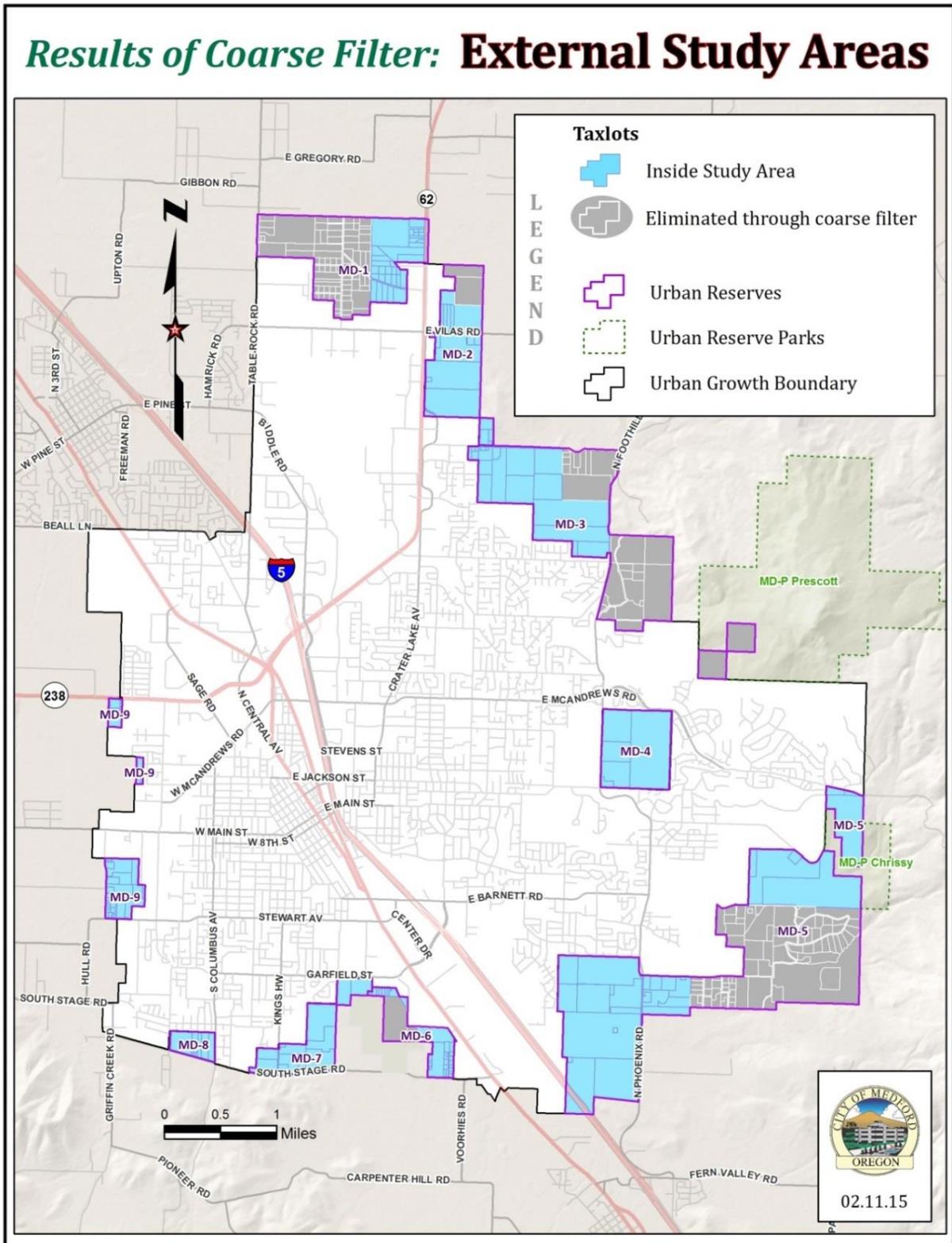
GLUP	Addition (acres) to Supply by GLUP per Individual SAL						Subtraction (acres) to Supply by GLUP per Individual SAL					
	CM	UM	UH	UR	SC	UR	GI	HI	UH			
	140a-cm 77.6	212a-um 5.2	215c-uh 3.8	215a-ur 0.1	960a-sc 2.4	212a-um 5.2	214a-cm 6.3	140a-cm 77.6	320a-cm 3.8			
	214a-cm 6.3	212b-um 4.5	250a-uh 3.1			212b-um 4.5	215a-ur 0.1	750a-cm 0	740a-cm 0.4			
	215b-cm 22.3	213a-um 6.7	510b-uh 7.1			213a-um 6.7	215b-cm 22.3	760a-cm 0	960a-sc 2.4			
	216a-cm 4.2	540b-um 21.1	540c-uh 19.7			217a-cm 4.2	215c-uh 3.8					
	217a-cm 12	540d-um 1.5	630a-uh 5.6			250a-uh 3.1	216a-cm 4.2					
	320a-cm 3.8	630b-um 16.5	640b-uh 18.3			510a-cm 27.1	217a-cm 7.8					
	510a-cm 27.1	640a-um 7.7	670b-uh 6.0			510b-uh 7.1						
	540a-cm 0.2	670a-um 1.1	718a-uh 5.3			540a-cm 0.2						
	640c-cm 3.0	730a-um 0				540b-um 21.1						
	680a-cm 1.5	930a-um 4.8				540c-uh 19.7						
	718b-cm 4.6	930c-um 6.6				540d-um 1.5						
	740a-cm 0.4					630a-uh 5.6						
	750a-cm 0					630b-um 16.5						
	760a-cm 0					640a-um 7.7						
	930b-cm 9.1					640b-uh 18.3						
	930d-cm 4.3					630c-cm 3.0						
	940a-cm 1.3					670a-um 1.1						
	970a-cm 0					670b-uh 6.0						
						680a-cm 1.5						
						718a-uh 5.3						
						718b-cm 4.6						
						730a-um 0						
						930b-cm 9.1						
						930c-um 6.6						
						930d-cm 4.3						
						940a-cm 1.3						
						970a-cm 0						
						930a-um 4.8						
Total Gain (Loss)	177.7	75.7	68.9	0.1	2.4	(196.1)	(44.5)	(77.6)	(6.6)			
GLUP	CM	UM	UH	SC	GI	HI	UR					
Net Gain (Loss) by GLUP	177.7	75.7	62.3	2.4	(44.5)	(77.6)	(196)					

Map 5.2. Parcel Size

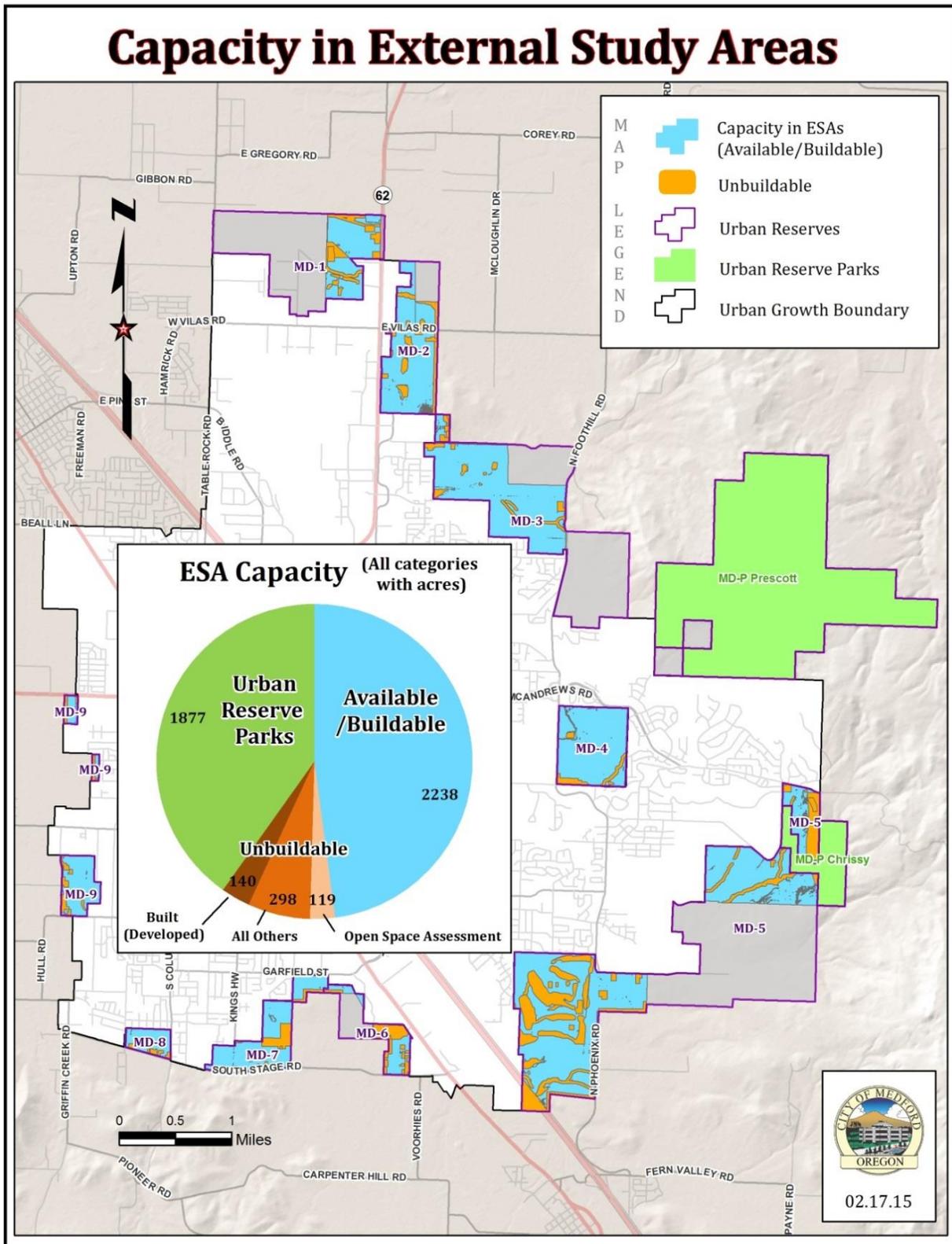


APPENDIX G. EXTERNAL STUDY AREA (ESA) AND CAPACITY IN ESA MAPS

Map 6.1. External Study Areas (ESAs)

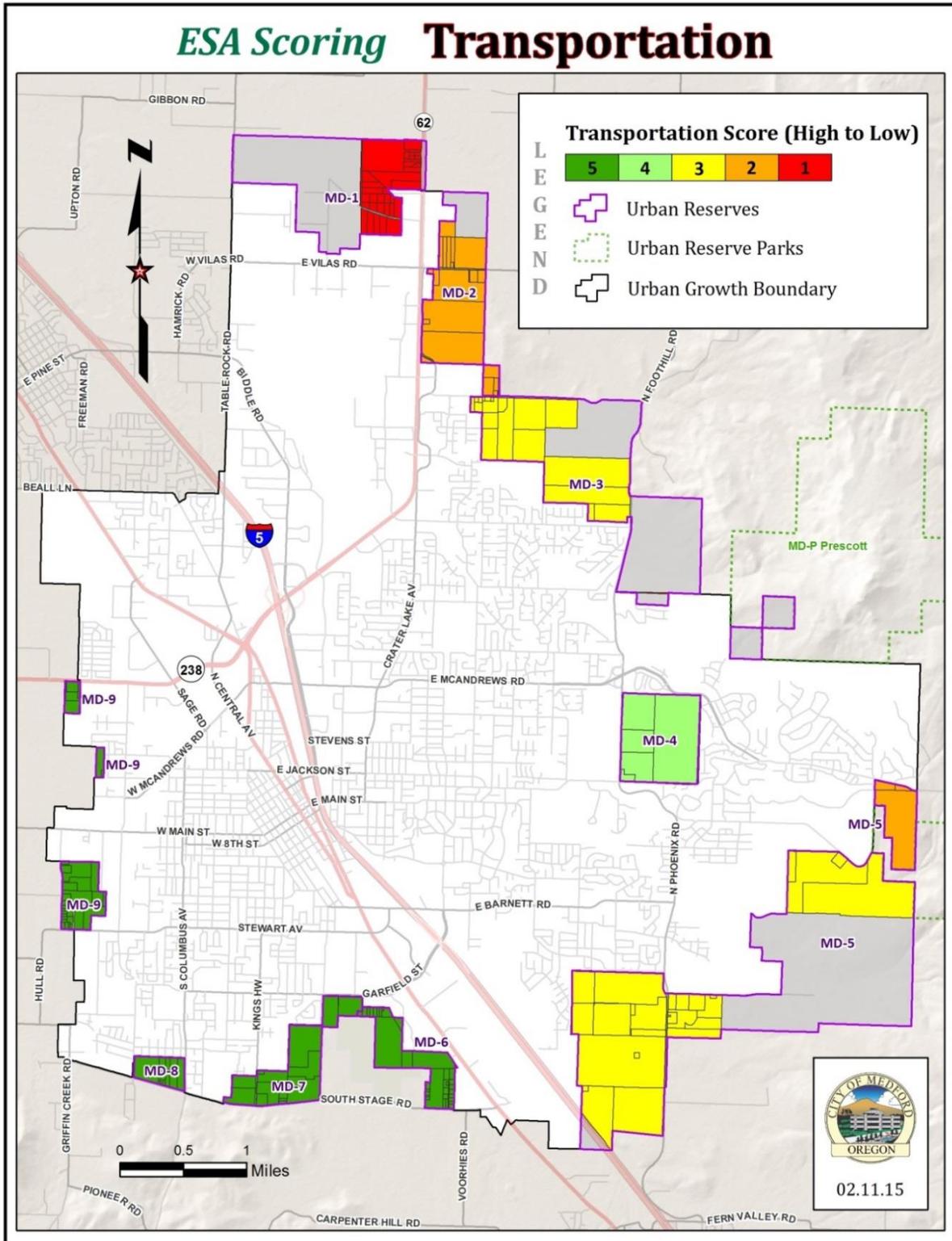


Map 6.2. Capacity Analysis Results for ESAs

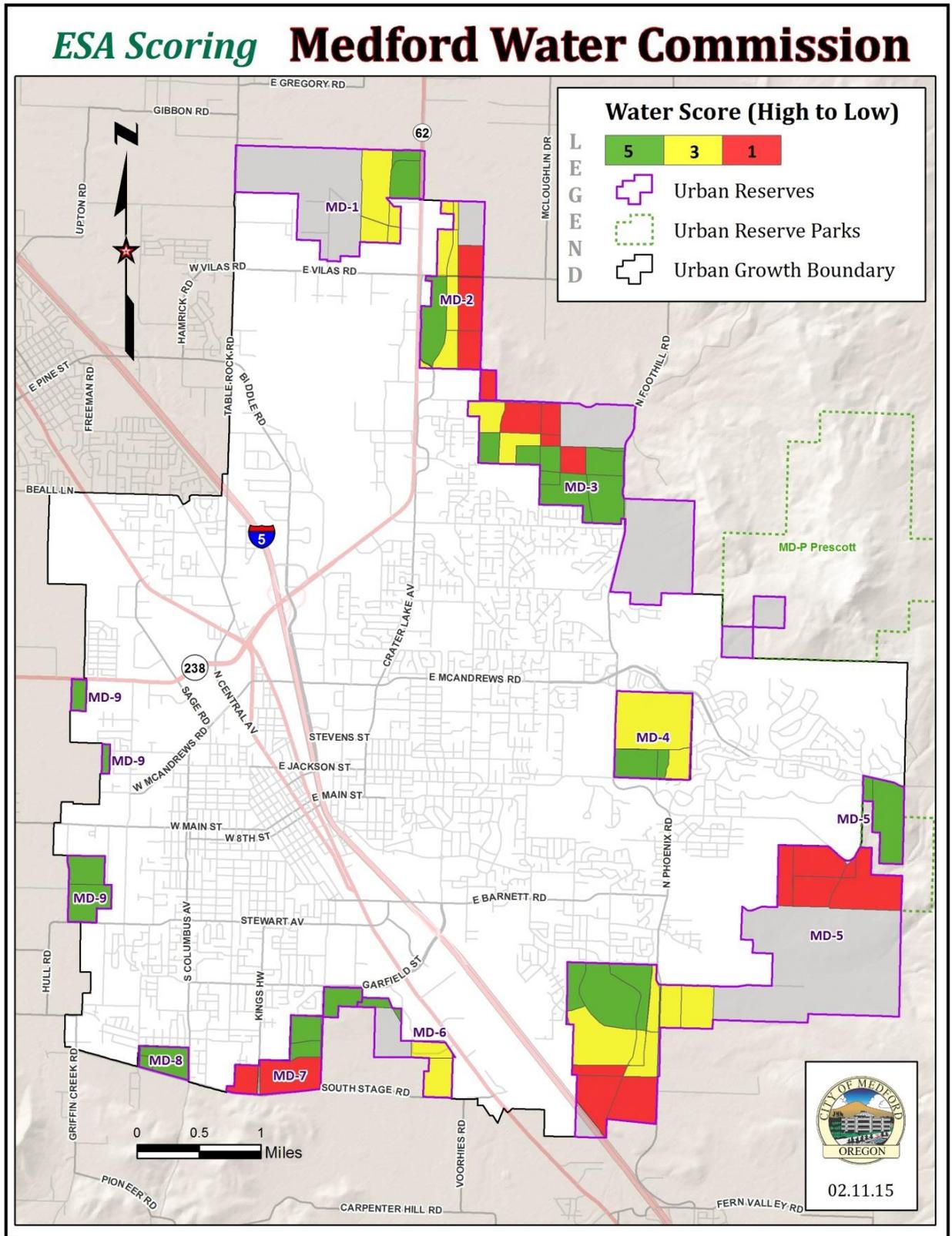


APPENDIX H. ADDITIONAL SCORING MAPS

Map 7.1. Transportation



Map 7.2. Water



APPENDIX I. INFRASTRUCTURE SCORING MEMOS

APPENDIX J. TRANSPORTATION MEMO

from PC Study Session, April 6, 2015, Exhibit D

SUBJECT UGB Amendment Project—Supplement to March 12, 2015 staff report
 Additional explanation of how staff translated transportation analyses into
 scoring maps

FILE NO. CP-14-114

TO Planning Commission

FROM Joe Slaughter, Planner IV, Comprehensive Planning

DATE April 6, 2015

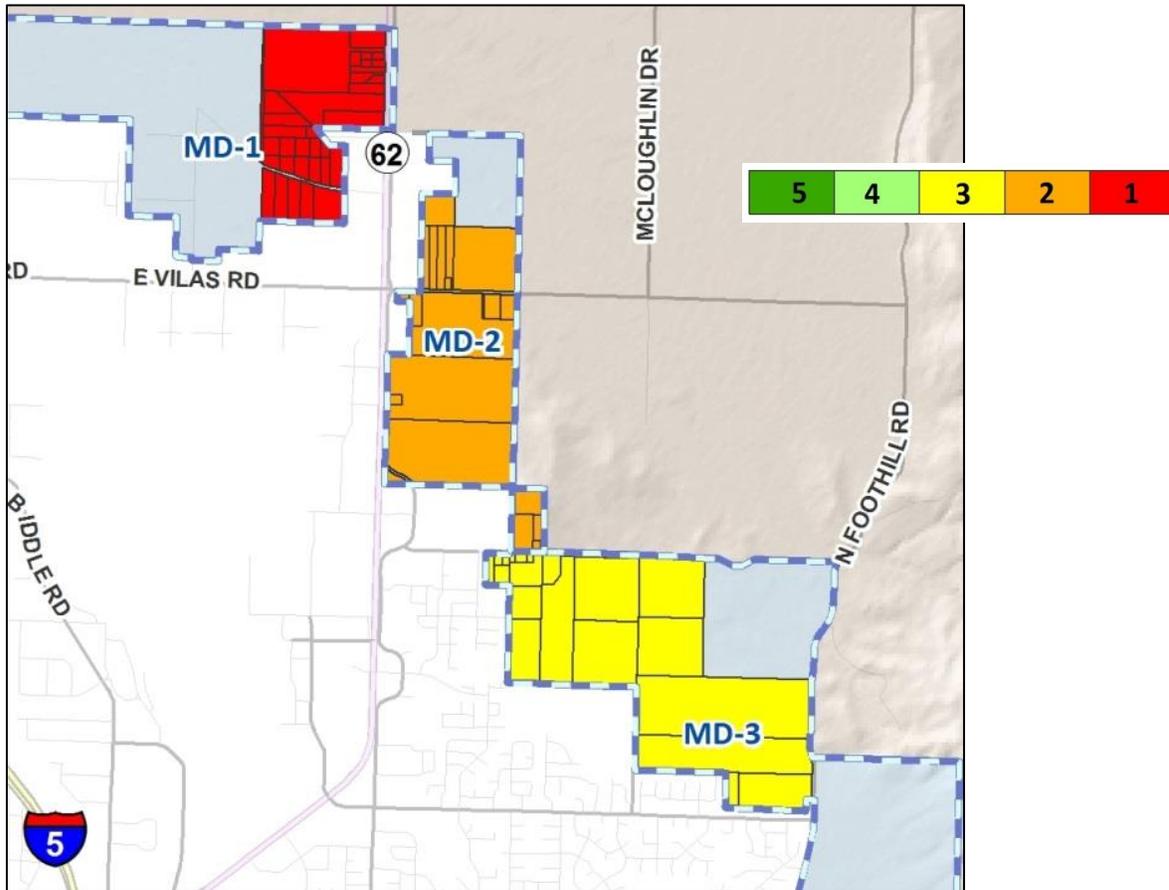
PROCESS

Staff asked the consultant, Kittelson and Associates, and ODOT’s Transportation Planning Analysis Unit (TPAU) to model four different growth scenarios within the external study areas (ESAs). Maps of the four scenarios are on page 110 of the March 12 hearing packet; they are part of draft technical memorandum no. 8 (TM-8) from Kittelson. Note that the models incorporated both the South Stage Road I-5 overpass and the new Highway 62 route. However, although Owen Drive was included in the model as an east–west connection to Foothill Road, Springbrook Road was not included as a north–south connection to East Vilas Road.

The scenario evaluations on pages 111–117 have one common message: growth at the current level of service will require a lot of system upgrades no matter where it happens. Given that, a number of differences stand out from the evaluations:

- The east side lacks a dense grid of streets; with fewer interconnections there are fewer route choices, forcing traffic onto just a few streets.
- New north–south routes parallel to Highway 62 are needed in the northeast.
- A north–south collector route parallel to Foothill–North Phoenix Road would be advisable on the east side.
- The west side has a dense enough grid of streets to handle growth in vehicular traffic pretty well, but improvements to multi-modality are needed.

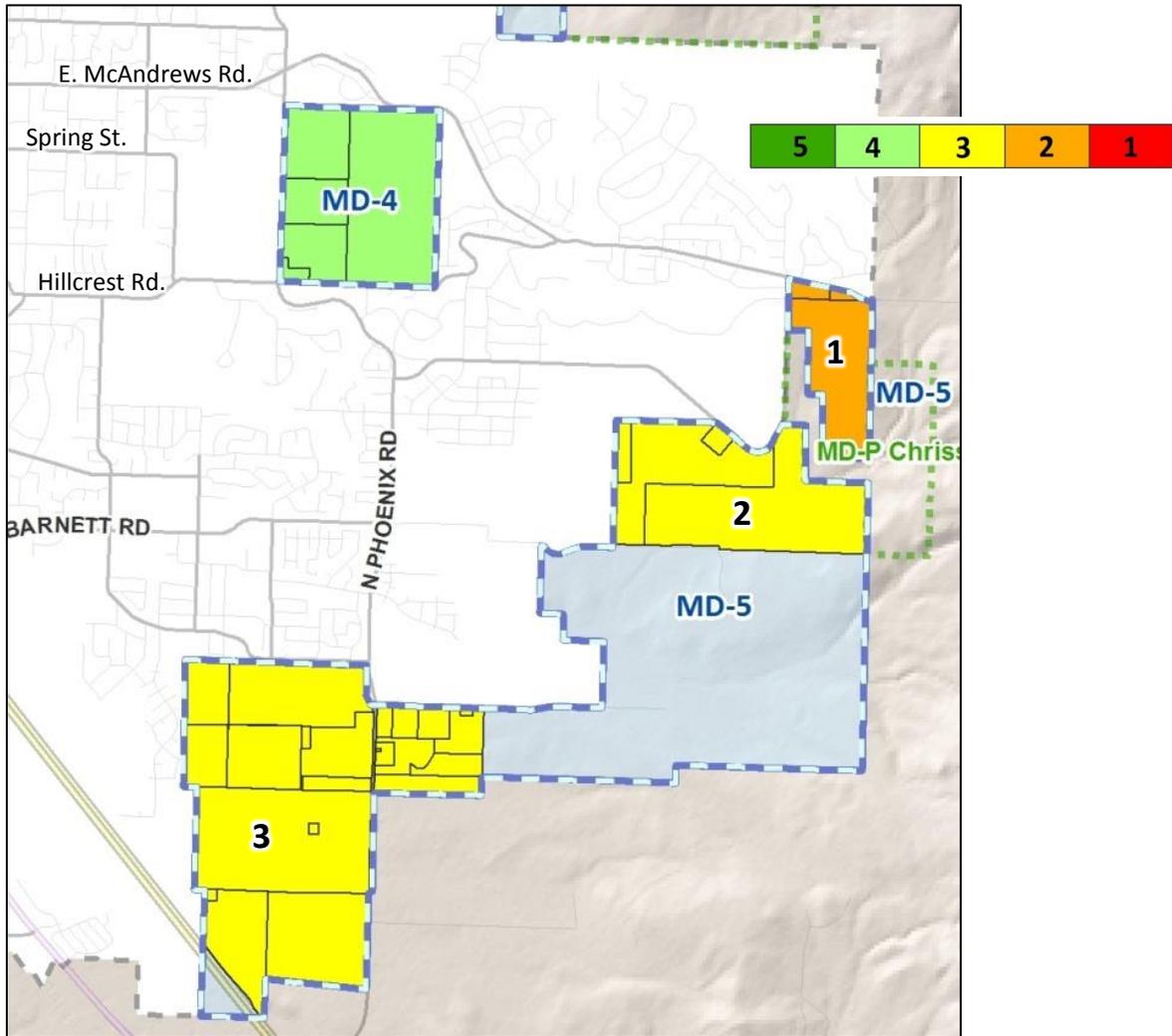
With the evaluations in hand, staff worked around the map and scored large blocks of the ESAs on a five-tiered scale. The process involved a lot of backing up and re-evaluating, a lot of looking at areas again and again in light of conclusions about other areas; in short, there were many iterations over a number of meetings. The next few sections summarize staff’s thinking about various sectors.



NORTHEAST

The Highway 62 corridor is more sensitive to growth than some other facilities. Staff originally considered giving both MD-1 and MD-2 the lowest score, but MD-2 was bumped up slightly because a Springbrook Road extension to East Vilas Road would provide an alternative to Crater Lake Highway (Hwy. 62). The MD-3 area was given a moderate score because connections through it would relieve pressure on Delta Waters Road.

Staff continually wrestled with the inherent irony in these discussions: bringing in land to help alleviate a transportation problem also creates further demands on the transportation system. However, the urban reserve is exactly where the City decided it wanted to grow in the future, so staff concentrated on where extending the boundary would provide some capacity benefit, and not just put additional traffic on existing streets.



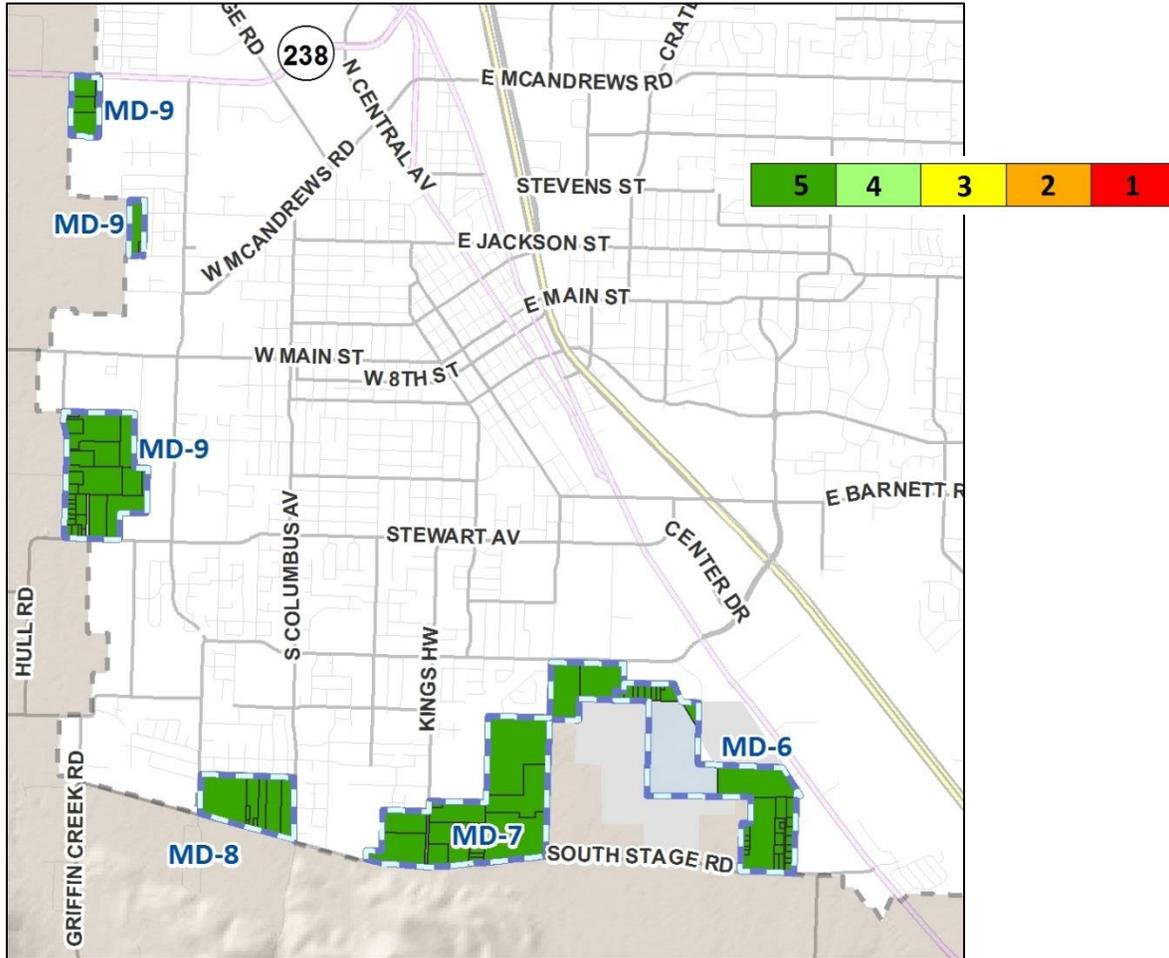
SOUTHEAST

Most of the areas in the southeast received low scores in the first go-around. It was obvious that North Phoenix Road will experience congestion no matter where development takes place in the urban reserve; it is an inevitable result of the growth that will occur in Medford and the surrounding communities as well. Note that the separate ESA parts of MD-5 are labeled 1–3 on the map for easier reference.

Staff reasoned that MD-4 (Hillcrest Orchards) would benefit from an extension of Spring Street eastward to join a collector coming north off Hillcrest Road through MD-4. Instead of just putting more traffic on East McAndrews Road and Hillcrest Road, it would provide an alternative route through its own development and the development of Dunbar Farm.

MD-5.1 would likely not be able to provide through-connections due to topography, hence the moderate-low score. MD-5.2 would include an extension of East Barnett Road that would bend northward to join Cherry Lane where it oxbows southward, so staff as-

signed it a moderate score. MD-5.3, comprising the Centennial golf course and the parcels south of it, also received a moderate score on the assumption that the South Stage overpass of the interstate highway would draw off pressure from North Phoenix Road and East Barnett Road.

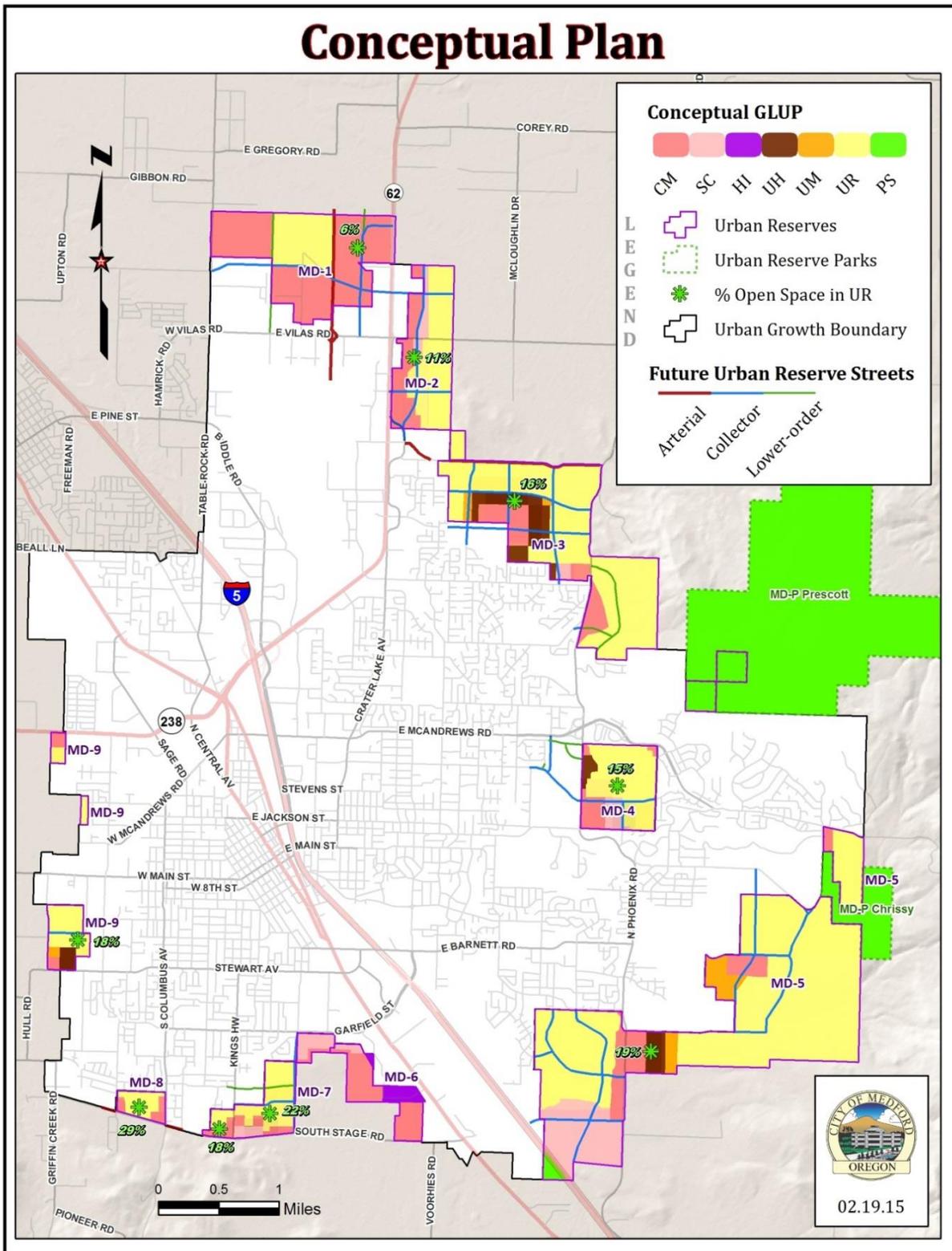


SOUTHWEST

Except for the segment of South Columbus Avenue between West 10th Street and Stewart Avenue, all the higher-order streets in this quadrant proved to have sufficient capacity for motor vehicles in all the modeling scenarios. In addition, MD-7 would allow the extension of South Holly Street to South Stage Road. Giving all the areas in this quadrant a high transportation score was an obvious choice for staff.

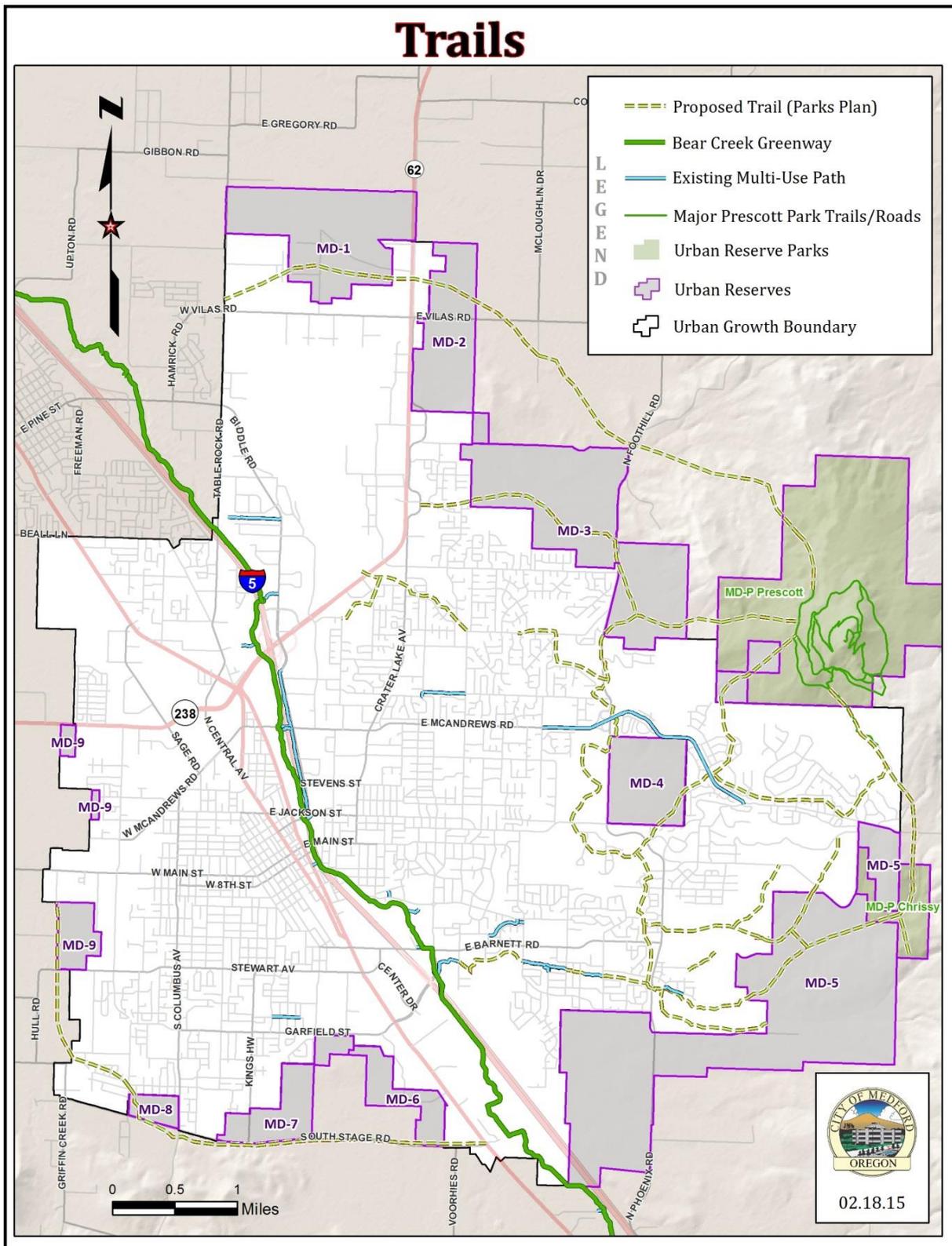
APPENDIX K. CONCEPTUAL PLAN

Map 8.1. Conceptual Plan for Urban Reserve (Higher-order Streets and Land Use)



Appendix K: Conceptual Plans

Map 8.2. UGB/Urban Reserve Trails Plan (adapted from Leisure Services Plan Figure 6.2)



APPENDIX L. LIST OF WRITTEN TESTIMONY RECEIVED DURING COUNCIL HEARINGS

<u>Exhibit</u>	<u>From</u>	<u>MD area/subarea</u>	<u>Received</u>
<u>E</u>	<u>White</u>	<u>9 south</u>	<u>03-30-2015</u>
<u>F</u>	<u>Hamlin</u>	<u>9 south</u>	<u>04-06-2015</u>
<u>G</u>	<u>Knox, Christopher</u>	<u>9 south</u>	<u>04-06-2015</u>
<u>H</u>	<u>Carlton</u>	<u>1</u>	<u>04-17-2015</u>
<u>I</u>	<u>Jackson County</u>	<u>=</u>	<u>04-14-2015</u>
<u>J</u>	<u>Starlite Lane group</u>	<u>6</u>	<u>06-03-2015</u>
<u>K</u>	<u>Rogue Valley Sewer Service</u>	<u>=</u>	<u>07-14-2015</u>
<u>L</u>	<u>Rogue Valley Manor</u>	<u>5 sw</u>	<u>07-20-2015</u>
<u>M</u>	<u>Stevens</u>	<u>6</u>	<u>07-20-2015</u>
<u>N</u>	<u>Siothun</u>	<u>=</u>	<u>07-06-2015</u>
<u>O</u>	<u>Matthews (ex parte)</u>	<u>=</u>	<u>multiple</u>
<u>P</u>	<u>Richard Steven and Associates</u>	<u>2</u>	<u>07-21-2015</u>
<u>Q</u>	<u>Matthews (ex parte)</u>	<u>=</u>	<u>07-22-2015</u>
<u>R</u>	<u>Hearn</u>	<u>5 mid</u>	<u>07-29-2015</u>
<u>S</u>	<u>Starlite Group</u>	<u>6</u>	<u>07-30-2015</u>
<u>T</u>	<u>Bartlett</u>	<u>5 ne</u>	<u>07-30-2015</u>
<u>U</u>	<u>Knox, Mark</u>	<u>7s and 8</u>	<u>07-30-2015</u>
<u>V</u>	<u>Mahar</u>	<u>5 ne</u>	<u>07-31-2015</u>
<u>W</u>	<u>Hansen</u>	<u>5 ne</u>	<u>07-31-2015</u>
<u>X</u>	<u>Vincent</u>	<u>5 ne</u>	<u>08-03-2015</u>
<u>Y</u>	<u>Carpenter</u>	<u>3 west</u>	<u>08-04-2015</u>
<u>Z</u>	<u>Harland</u>	<u>general</u>	<u>08-04-2015</u>
<u>AA</u>	<u>Broadway</u>	<u>6</u>	<u>08-04-2015</u>
<u>BB</u>	<u>Montero</u>	<u>5 sse</u>	<u>08-05-2015</u>
<u>CC</u>	<u>Savage</u>	<u>3 east</u>	<u>08-05-2015</u>
<u>DD</u>	<u>Desmond</u>	<u>7 north</u>	<u>08-05-2015</u>
<u>EE</u>	<u>Caldwell/Hight</u>	<u>general</u>	<u>08-05-2015</u>
<u>FF</u>	<u>Root</u>	<u>general</u>	<u>08-05-2015</u>
<u>GG</u>	<u>Stark</u>	<u>3 west</u>	<u>08-06-2015</u>
<u>HH</u>	<u>Cofield</u>	<u>3 west</u>	<u>08-06-2015</u>
<u>II</u>	<u>Kell</u>	<u>3</u>	<u>08-06-2015</u>
<u>JJ</u>	<u>Montero</u>	<u>general</u>	<u>at hearing 08-06-2015</u>
<u>KK</u>	<u>LaNier/Parducci</u>	<u>2</u>	<u>at hearing 08-06-2015</u>
<u>LL</u>	<u>Savage</u>	<u>general</u>	<u>at hearing 08-06-2015</u>
<u>MM</u>	<u>Savage</u>	<u>general</u>	<u>at hearing 08-06-2015</u>

<u>Exhibit</u>	<u>From</u>	<u>MD area/subarea</u>	<u>Received</u>
NN	Woerner	4	at hearing 08-06-2015
OO	Woerner	4	at hearing 08-06-2015
PP	Mahar	5 ne	at hearing 08-06-2015
QQ	Jones	5 ne	at hearing 08-06-2015
RR	Stocker	5 sw	at hearing 08-06-2015
SS	Brooks	9 north	at hearing 08-06-2015
TT	Houghton	9 mid	08-11-2015
UU	Fischer	7	08-11-2015
VV	Hathaway	5 sw	at hearing 08-06-2015
WW	LeBombard/DLCD	general	08-13-2015
XX	Bennett	5 ne	08-13-2015
YY	Chamberland	5 ne	08-13-2015
ZZ	Desmond	5 ne	08-13-2015
AAA	Watson	5 ne	at hearing 08-13-2015
BBB	Mahar Jr.	5 ne	at hearing 08-13-2015
CCC	Lulich	5 ne	at hearing 08-13-2015
DDD	Lane	5 ne	at hearing 08-13-2015
EEE	Hall	5 ne	at hearing 08-13-2015
FFF	Jones	5 ne	at hearing 08-13-2015
GGG	Hansen	5 ne	at hearing 08-13-2015
HHH	Stone	5 ne	at hearing 08-13-2015
III	Hansen	5 ne	at hearing 08-13-2015
JJJ	Broadway	6	at hearing 08-13-2015
KKK	Ayala	7 & 8	at hearing 08-13-2015
LLL	Ayala	7 & 8	at hearing 08-13-2015
MMM	White	9	at hearing 08-13-2015
NNN	Dobson	9	at hearing 08-13-2015
OOO	Brooks	9	at hearing 08-13-2015
PPP	Hight	general	at hearing 08-13-2015
QQQ	Woerner	general	at hearing 08-13-2015
RRR	Brooks	5 ne	at hearing 08-13-2015
SSS	Freel	8	at hearing 08-13-2015
TTT	Caldwell	general	at hearing 08-13-2015
UUU	Hanson	5 ne	at hearing 08-13-2015
VVV	Hanson	5 ne	at hearing 08-13-2015
WWW	Schroeder	4	08-14-2015
XXX	Knox, Mark	7 & 8	at hearing 08-13-2015
YYY	Stevens	6	08-20-2015

<u>Exhibit</u>	<u>From</u>	<u>MD area/subarea</u>	<u>Received</u>
<u>ZZZ</u>	<u>Holmes/1000 Friends</u>	<u>general</u>	<u>08-20-2015</u>
<u>AAAA</u>	<u>Morehouse/ODOT</u>	<u>general</u>	<u>08-20-2015</u>
<u>BBBB</u>	<u>Hansen</u>	<u>5 ne</u>	<u>at hearing 08-20-2015</u>
<u>CCCC</u>	<u>Hays</u>	<u>general</u>	<u>at hearing 08-20-2015</u>
<u>DDDD</u>	<u>Stocker</u>	<u>5 sw</u>	<u>at hearing 08-20-2015</u>
<u>EEEE</u>	<u>Bartholomew</u>	<u>2</u>	<u>at hearing 08-20-2015</u>
<u>FFFF</u>	<u>Harland</u>	<u>general</u>	<u>at hearing 08-20-2015</u>
<u>GGGG</u>	<u>Ayala</u>	<u>7 & 8</u>	<u>at hearing 08-20-2015</u>
<u>HHHH</u>	<u>Morehouse/ODOT</u>	<u>general</u>	<u>08-24-2015</u>
<u>IIII</u>	<u>Mahar</u>	<u>5 ne</u>	<u>08-27-2015</u>
<u>JJJJ</u>	<u>Broadway/Starlite</u>	<u>6</u>	<u>09-11-2015</u>
<u>KKKK</u>	<u>Hadrian</u>	<u>5 ne</u>	<u>09-11-2015</u>
<u>LLLL</u>	<u>Siothun/Parks & Rec</u>	<u>general</u>	<u>09-14-2015</u>
<u>MMMM</u>	<u>LeBombard/DLCD</u>	<u>general</u>	<u>09-16-2015</u>
<u>OOOO</u>	<u>Maize</u>	<u>7 north</u>	<u>09-17-2015</u>
<u>PPPP</u>	<u>Pfeiffer</u>	<u>4</u>	<u>09-17-2015</u>
<u>QQQQ</u>	<u>Harris</u>	<u>7 & 8</u>	<u>09-26-2015</u>
<u>RRRR</u>	<u>Pfeiffer</u>	<u>4</u>	<u>10-01-2015</u>
<u>SSSS</u>	<u>Woerner</u>	<u>4</u>	<u>10-01-2015</u>
<u>TTTT</u>	<u>Hansen</u>	<u>5 ne</u>	<u>10-01-2015</u>
<u>UUUU</u>	<u>Hashimoto</u>	<u>4</u>	<u>10-14-2015</u>
<u>VVVV</u>	<u>Canon</u>	<u>3</u>	<u>10-14-2015</u>
<u>WWWW</u>	<u>Allan</u>	<u>4</u>	<u>10-14-2015</u>
<u>XXXX</u>	<u>Hansen</u>	<u>5 ne</u>	<u>10-14-2015</u>
<u>YYYY</u>	<u>Montero</u>	<u>general</u>	<u>10-14-2015</u>
<u>ZZZZ</u>	<u>Brooks</u>	<u>9</u>	<u>10-15-2015</u>
<u>AAAAA</u>	<u>Stevens</u>	<u>2 & 5</u>	<u>10-15-2015</u>
<u>BBBBB</u>	<u>Hathaway</u>	<u>5</u>	<u>10-15-2015</u>
<u>CCCCC</u>	<u>Pfeiffer</u>	<u>general</u>	<u>10-15-2015</u>
<u>DDDDD</u>	<u>Montero</u>	<u>general</u>	<u>10-15-2015</u>
<u>EEEEE</u>	<u>Kell</u>	<u>3</u>	<u>10-19-2015</u>
<u>FFFFF</u>	<u>Mahar</u>	<u>5 ne</u>	<u>10-21-2015</u>
<u>GGGGG</u>	<u>Ayala et al</u>	<u>7</u>	<u>11-03-2015</u>
<u>HHHHH</u>	<u>Hearn</u>	<u>5 mid</u>	<u>11-05-2015</u>
<u>IIIII</u>	<u>Honecker Cowling</u>	<u>2</u>	<u>11-11-2015</u>
<u>JJJJJ</u>	<u>Pfeiffer</u>	<u>general</u>	<u>11-17-2015</u>
<u>KKKKK</u>	<u>Stark & Hammack</u>	<u>3</u>	<u>11-18-2015</u>

<u>Exhibit</u>	<u>From</u>	<u>MD area/subarea</u>	<u>Received</u>
<u>LLLLL</u>	<u>Pfeiffer</u>	<u>general</u>	<u>12-02-2015</u>
<u>MMMMM</u>	<u>Kupillas (Manor)</u>	<u>5 sw</u>	<u>12-16-2015</u>
<u>NNNNN</u>	<u>Hornecker Cowling</u>	<u>2</u>	<u>12-17-2015</u>
<u>OOOOO</u>	<u>Stark-Hammack</u>	<u>3</u>	<u>12-17-2015</u>
<u>PPPPP</u>	<u>Pfeiffer</u>	<u>4</u>	<u>12-17-2015</u>
<u>QQQQQ</u>	<u>CSA: "grand bargain"</u>	<u>general</u>	<u>01-21-2016</u>
<u>RRRRR</u>	<u>CSA: Hansen</u>	<u>5 ne</u>	<u>02-05-2016</u>
<u>SSSSS</u>	<u>Carpenter</u>	<u>3</u>	<u>02-08-2016</u>
<u>TTTTT</u>	<u>LeBombard/DLCD</u>	<u>general</u>	<u>02-10-2016</u>
<u>UUUUU</u>	<u>PRI (LDS church)</u>	<u>3</u>	<u>02-17-2016</u>
<u>VVVVV</u>	<u>Holmes/1000 Friends</u>	<u>general</u>	<u>02-22-2016</u>
<u>WWWWW</u>	<u>Pfeiffer</u>	<u>general</u>	<u>02-24-2016</u>
<u>XXXXX</u>	<u>Pfeiffer</u>	<u>general</u>	<u>02-25-2016</u>

APPENDIX L. Alternatives**Memorandum****Subject** — UGB Amendment Project**File no.** CP 14 114**To** — Planning Commission**From** — Joe Slaughter, Planner IV, Comprehensive planning division**Reviewed by** — Bianca Petrou, Assistant Planning Director**Date** — May 5, 2015 — *for May 14, 2015 PC meeting*

The Planning Commission held a public hearing on UGBA Phase 2: ESA Boundary Amendment at its March 12, 2015 meeting. More than 40 people testified in response to this item. The Commission closed the hearing after 4½ hours of testimony but kept the record open until March 26, 2015. On April 6, 2015, the Planning Commission met with staff at a special study session to further discuss the proposal prior to making a recommendation to City Council. Staff compiled all of the written testimony through March 26, 2015 and provided these materials to the Commission at the study session. Staff also provided a table to help track challenges to the land need figures, a table showing acreage figures for each of the urban reserve subareas, a table and a map to help track the requests for inclusion that were received at the hearing, and a memo to better explain how transportation was scored based on a memo from Kittelson and Associates.

At the April 6 study session, the Commission directed staff to provide alternatives regarding where to remove roughly 175 acres from staff's recommendation based on the challenges received in the letter dated March 3, 2015 from 1000 Friends of Oregon (pages 353–367 of the March 12, 2015 Planning Commission agenda packet) and a request to reclassify 22 acres from “developed” (therefore counted as unbuildable) to developable. The Commission also asked staff to draft a memo responding to the challenges contained in the letter from 1000 Friends of Oregon. The Commission asked staff to bring this matter, with the requested alternatives and memo back to the Commission at the May 14, 2015 meeting.

All of the acreage to be removed must come from the residential land types, primarily from the lower density residential supply. With the exception of a few areas that have been designated exclusively for employment uses, most of the proposed UGB expansion areas include a mix of uses. There is a need for large amounts of employment land designations because the City adopted the “high growth” scenario in its Economic Element. It was a challenge to find suitable locations for all of the employment land within the UGB expansion areas and that challenge is amplified by the revised land need. Non-

regional commercial development needs nearby residential development to be viable. The removal of approximately 175 acres of residential land should be done in a way that does not leave commercial land in areas that are not likely to be used.

In developing the three alternatives (attached), staff considered all areas included in the original recommendation. The portions of MD-2 included in the recommendation were not removed in any of the alternatives because MD-2 provides for the kinds of regional commercial development that can serve, and be supported by, users outside of the immediate area. This is due in large part to MD-2's location along Highway 62.

The future South Valley Employment Center is contained within the portions of MD-5 recommended for inclusion. This area is needed for future economic development in the city and in the region. The South Valley Employment Center is a great fit for a large portion of the identified employment land need. The inclusion of the lower density residential property to the north of the South Valley Employment Center provides connections between the employment area and existing urban development to the north. The lower density residential area contains the approximately 120 acre Centennial Golf Club. The golf course is counted as unbuildable and does not count against the City's supply of developable residential land. The portions of MD-5 east of North Phoenix Road and south of Coal Mine Road help to provide for a portion of the employment land need while also providing for high and medium density residential development adjacent to a future elementary school. For those reasons, none of MD-5 was recommended for removal.

Staff also considered removing areas along the southwest fringe, ultimately deciding against it for the following reasons. These areas, MD-7, MD-8, and MD-9, are well suited to provide the kinds of mixed use/walkable neighborhoods required by the Regional Plan and to help provide needed affordable housing. The relatively close proximity of these areas to the city core, the fact that much of this area is relatively flat, and the existing network of gridded streets increase the likelihood of well integrated mixed use/walkable neighborhoods developing in these locations. The Housing Element identified a large need for affordable housing but it did not identify a solution for meeting the need. These portions of the urban reserve can help to meet the need for affordable housing by providing land with relatively low development costs. These areas are relatively flat, they are relatively well connected to existing development, and they score well on serviceability for water, sewer, and transportation.

Attached are the requested memo and three alternatives for the urban growth boundary expansion given the revised land need of approximately 1,500 acres. The attachments include maps of each of the alternatives and reasons for why each of these alternatives has been presented for consideration. A map of the Buildable Lands Inventory and its relationship to the urban reserve is also provided for reference.

Recommended Action

~~Choose 1 of the 3 staff alternatives, or develop another alternative, for UGB expansion and direct staff to prepare findings for recommendation to Council. Staff can return with the recommendation and revised findings for approval at the June 11, 2015 Planning Commission meeting.~~

Revised Recommendation: Alternative 1

Recommendation: Remove a portion of MD-4 from staff's recommendation.

Why: ~~In many cases the loss of residential uses in the expansion areas would make commercial development unlikely. Because it is surrounded by the existing city limits, MD-4 is nearly surrounded by existing residential development and therefore commercial development on this property could be viable without the addition of large tracts of residential development. The inclusion of the southern third of MD-4, primarily for commercial development, would support the development of a small commercial center around the intersection of Hillcrest Road with North Phoenix Road—Foothill Road. Commercial development already exists on the southeast corner of the intersection, there is an existing winery near the northeast corner (southwest portion of MD-4), and commercial development around the intersection has been further encouraged through the adoption of the SALs (UGBA Phase 1).~~

~~There are more than 200 acres of nearly vacant residential land within the existing UGB and city limit within a half mile of MD-4. The inclusion of all of MD-4, with approximately 200 acres for residential development, would bring that total to more than 400 acres available for residential development in the immediate area. Not all of MD-4 is needed to provide for residential development in the vicinity over the next 20 years.~~

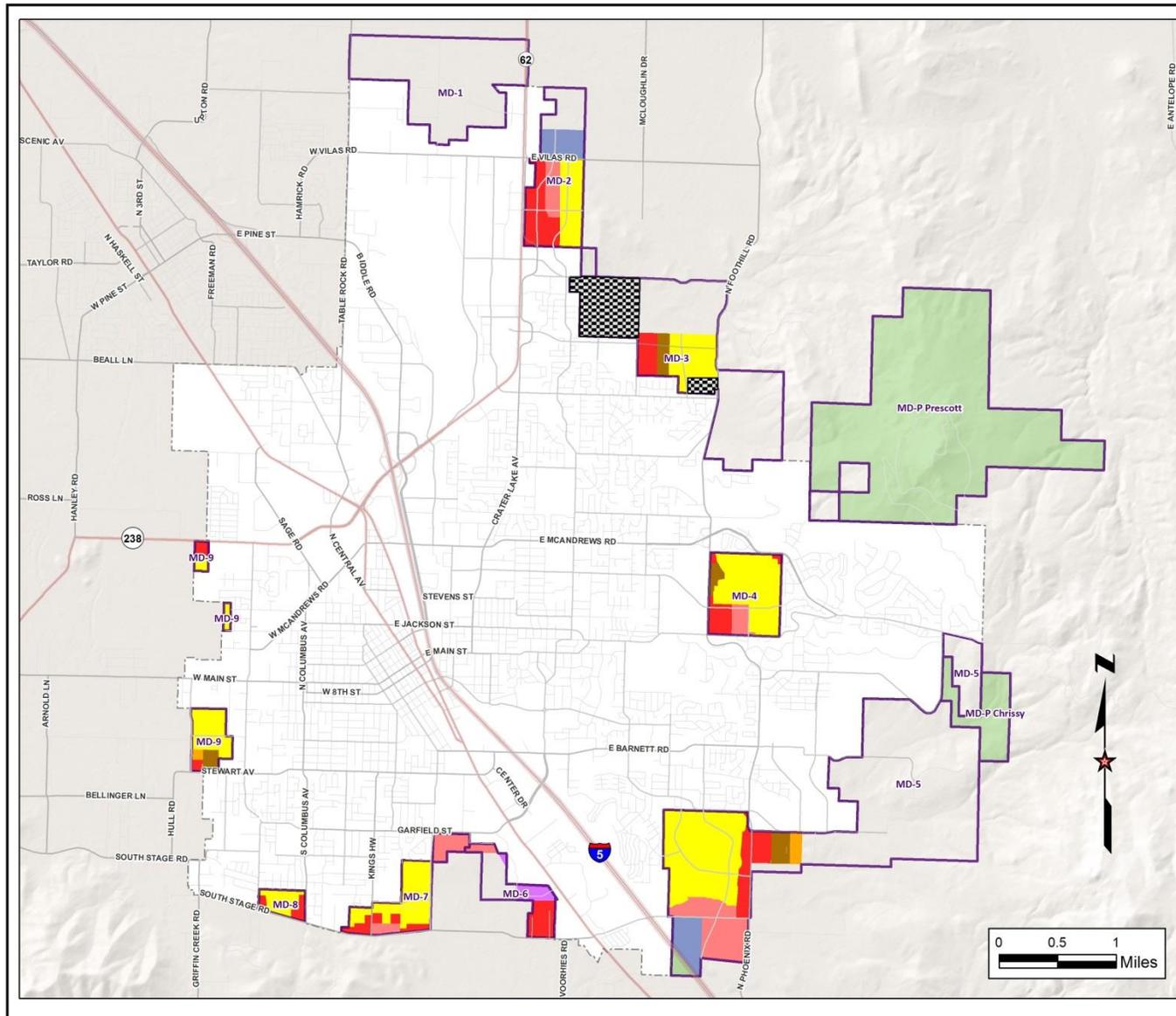
~~A map showing the location of staff's recommendation as it relates to buildable land (data from adopted Buildable Lands Inventory) is attached for reference. With the exception of the east portions of MD-5, MD-4 has the greatest amount of land adjacent to it that is both within the existing UGB and available for residential development. When attempting to spread the supply of developable lands around the City it is necessary to consider not only the lands being added to the UGB but also the developable land within the current UGB.~~

Revised Recommendation: Alternative 2

Recommendation: Remove the northwest portion of MD-3 from staff's recommendation.

Why: Staff's original recommendation included most of MD-2 and two large portions of MD-3, containing both commercial and residential components. The portions of MD-2 are a better fit for employment uses than either of the portions of MD-3 due to MD-2's proximity to Highway 62 and existing commercial uses. Therefore, staff dismissed removing MD-2. There is some capacity within the existing UGB for residential development in the vicinity of MD-2 and MD-3, although it is not as extensive as around MD-4 and MD-5. This remaining capacity, along with the inclusion of much of MD-2 and one large portion of MD-3, will provide adequate land for residential development in the area to support the required employment land.

Staff prefers the removal of this portion of MD-3 rather than the southeast portion (Alternative 3) because that portion helps to provide for the extension of Owen Drive and the eventual connection of Owen Drive with Foothill Road. A parallel route to Delta Waters Road would be more useful for traffic distribution than a north/south connection from Delta Waters Road to a rural Coker Butte Road.



Proposed Urban Growth Boundary Amendment

Alternative 2

Expansion Areas with proposed General Land Use Plan designations

CM	SC	HI	GI	UH	UM	UR	PS
----	----	----	----	----	----	----	----

- Urban Reserves
- Urban Growth Boundary
- Removed from Proposed UGBA Map (dated 01.20.15)

Note: Unbuildable areas not depicted on map

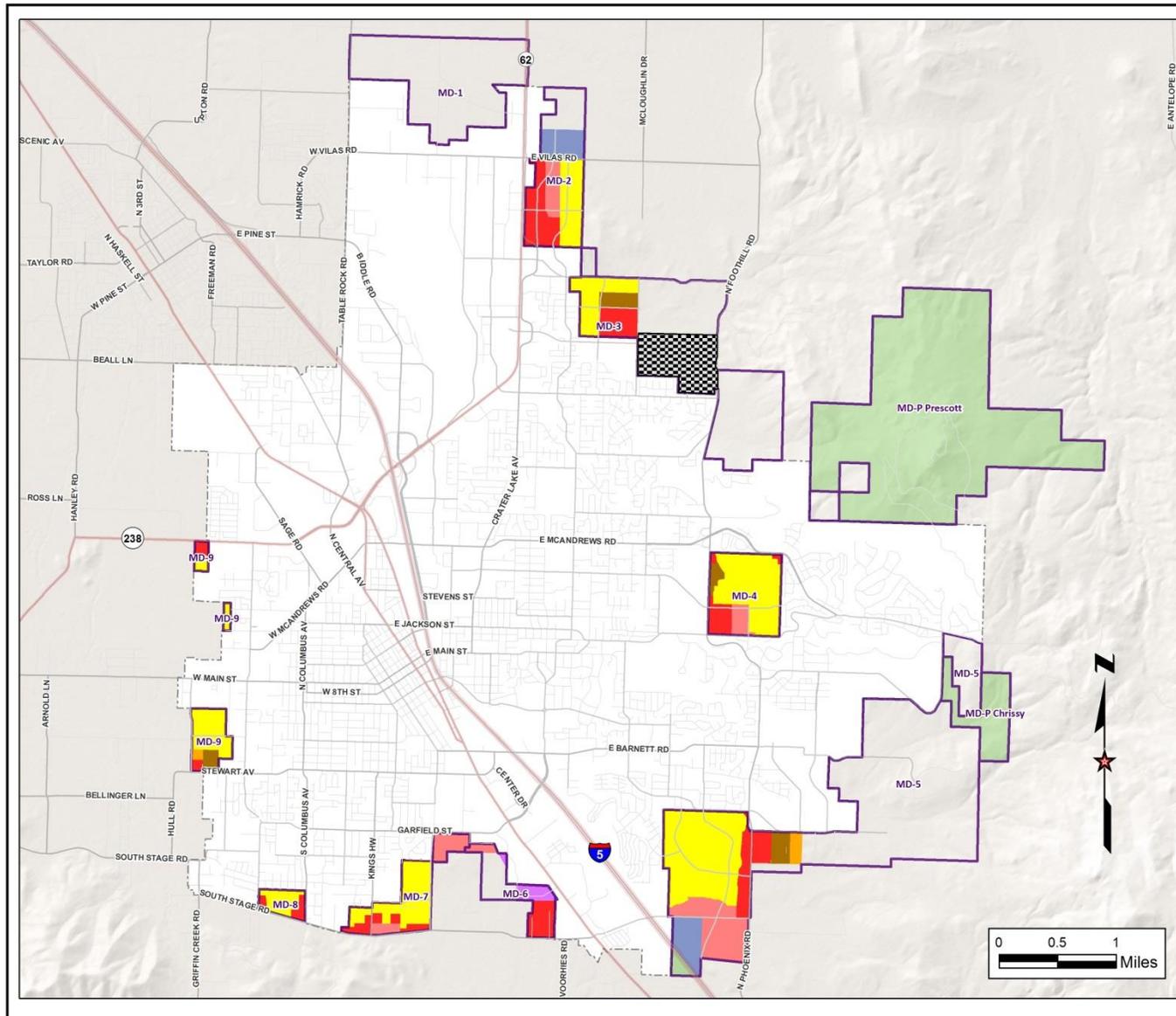


Revised Recommendation: Alternative 3

Recommendation: Remove the southeast portion of MD-3 from staff's recommendation.

Why: Staff's original recommendation included most of MD-2 and two large portions of MD-3, containing both commercial and residential components. The portions of MD-2 are a better fit for employment uses than either of the portions of MD-3 due to MD-2's proximity to Highway 62 and existing commercial uses. Therefore, staff dismissed removing MD-2. There is some capacity within the existing UGB for residential development in the vicinity of MD-2 and MD-3, although it is not as extensive as around MD-4 and MD-5. This remaining capacity, along with the inclusion of much of MD-2 and one large portion of MD-3, will provide adequate land for residential development in the area to support the required employment land.

Staff prefers Alternative 2, the removal of the northwest portion of MD-3, rather than this Alternative because the southeast portion helps to provide for the extension of Owen Drive and the eventual connection of Owen Drive with Foothill Road. A parallel route to Delta Waters Road would be more useful for traffic distribution than a north/south connection from Delta Waters Road to a rural Coker Butte Road.



Proposed Urban Growth Boundary Amendment

Alternative 3

Expansion Areas with proposed General Land Use Plan designations

CM	SC	HI	GI	UH	UM	UR	PS
----	----	----	----	----	----	----	----

- Urban Reserves
- Urban Growth Boundary
- Removed from Proposed UGBA Map (dated 01.20.15)

Note: Unbuildable areas not depicted on map

