STAFF REPORT — REVISED

GENERAL LAND USE PLAN MAP AMENDMENT

Date: April 16, 2014

To: Medford City Council

From: John Adam, Planner IV

Reviewer: Bianca Petrou, Assistant Planning Director

Subject: UGBA Phase 1: ISA GLUP Amendment file no. **CPA-13-032**

CONTENTS

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PROPOSAL

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.

BACKGROUND

The Planning Commission and Planning Department staff developed a set of areas to analyze for changes in land-use designation. In some cases the potential change was from Industrial to Commercial, in others it was from Low-Density Residential to Medium- or High-Density Residential. These "internal study areas" (ISAs) covered about 850 acres in various locations throughout the City.

Because a significant change to a land-use designation may be infeasible due to sewer, water, or transportation facility capacity constraints, the ISAs were analyzed for facility effects. It was assumed that such analyses would eliminate those areas with severe capacity problems. As it turned out, the ISAs showed minor or few facility impacts. None were eliminated at this step.

The next stage was to take the ISAs to the Planning Commission for their recommendation. Two tools were employed to aid the Commission: public testimony and a set of qualitative criteria for rating the ISAs.

After two hearings on January 23 and February 13, 2014, and after staff prepared a recommendation, the Planning Commission deliberated at its March 13 meeting and voted to recommend a set of "proposed amendment locations" (PALs) for the City Council's consideration. With this recommendation made, the ISAs can now be considered defunct.

The purpose of this **revised report** is to summarize the findings and the work that led to the proposal. Following this introductory section is the recommendation, along with details on the selection process for the proposed amendment locations, then the findings.

The remainder of this introductory section will summarize the City's land need and the proposed amendment locations.

LAND NEED

The basis for the City's twenty-year land need is the Housing and the Economic Elements of the Comprehensive Plan. The land needs determined in those chapters were based on the adopted population forecast and market analyses. The need figures are summarized in *Table I.1*.

Table I.1. Residential and Employment Land Need (in gross acres)

Plan Designation	Need	Plan Description
UR	(826)	Low-density Residential, 4–10 units/acre
UM	(75)	Medium-density Residential, 10–15 units/acre
UH	(93)	High-density Residential, 15–30 units/acre
total Residential	(996)	
SC	(448)	Service Commercial: office, services, medical
GI & HI	55	General & Heavy Industrial: manufacturing
CM	(316)	Commercial: retail, services
total Employment	(709)	
Land need overall	(**1,705**)	

Refer to the findings under Criterion 2, under "Findings," below, for greater detail on the land need.

RECOMMENDATION & PAL SELECTION PROCESS

PAL BACKGROUND

After two Planning Commission hearings, staff prepared a recommendation based on the qualitative criteria that were developed with the Planning Commission in the fall of 2013 and based on some of the ideas from the January 23 and February 13 testimony. At this stage the Planning Commission selected the Proposed Amendment Locations (PALs) out of the group of internal study areas (ISAs).

More than 800 acres of ISA were analyzed. There was much more in the two residential categories than was needed, but it is not possible to make selections unless there is a large pool to choose from. The commercial category could satisfy at most a third of the need.

QUALITATIVE CRITERIA

As noted in the original staff report, the technical analysis did not reveal any major problems in the study areas. By and large, the changes could be made without significant upgrades to sewer and water services. The unknown factor is transportation, which will have to be comprehensively addressed with the combined internal GLUP changes and external expansion. The vital transportation issues yet to be tackled are

"level of service" (LOS) and concurrency. Concurrency is the policy of requiring sufficient transportation system capacity to be in place at the time of development instead of relying on planned or programed capacity improvements.

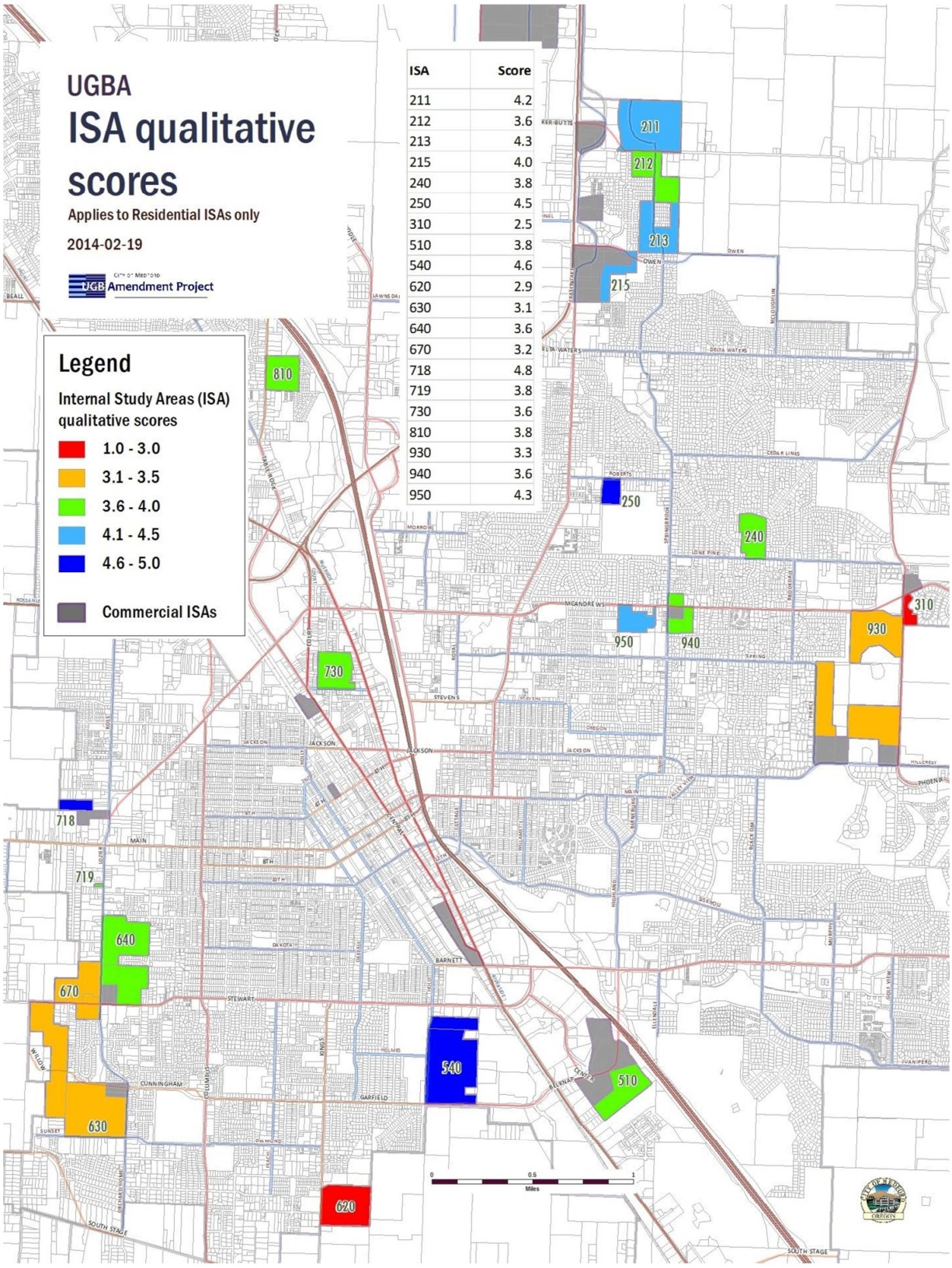
Realizing that the ISAs could not easily be reduced to a smaller group of candidates based on the technical analyses, staff and the Planning Commission developed a set of qualitative factors in the fall of 2013 that rated residential ISAs on a scale of one to five[1] for the following:

1. Parcelization: smaller lots are less desirable than larger lots
2. Proximity to an elementary school: more desirable for young families with young children, who are likelier to be in smaller housing
3. Proximity to a grocery store: the closer the store, the greater the transportation mode choices
4. Proximity to transit: greater transportation mode choice
5. Variety of land-use types in vicinity: this was applied only to UH-designated ISAs on the premise that a greater variety of different land uses (and zoning) within a quarter-mile periphery is conducive to a vibrant mix and has a greater degree of compatibility. The greater the variety, the higher the score.

These qualitative factors were not intended to be deterministic on their own, but to serve as guides for the Planning Commission in creating a recommendation. Staff's approach in coming up with a recommendation was to balance the qualitative scores with testimony, and after taking a closer look at on-the-ground conditions in the internal study areas as a feasibility check.

A map of the qualitative tests results is on the following page.

[1] The last factor in the list was an exception to this; its score range was 2–4 in order to weigh it less heavily than the others.


UGBA
ISA qualitative scores
Applies to Residential ISAs only
2014-02-19
UGB Amendment Project
Legend
Internal Study Areas (ISA) qualitative scores
1.0 - 3.0
3.1 - 3.5
3.6 - 4.0
4.1 - 4.5
4.6 - 5.0
Commercial ISAs
ISA Score
211 4.2
212 3.6
213 4.3
215 4.0
240 3.8
250 4.5
310 2.5
510 3.8
540 4.6
620 2.9
630 3.1
640 3.6
670 3.2
718 4.8
719 3.8
730 3.6
810 3.8
930 3.3
940 3.6
950 4.3
0 0.5 1 Miles

SELECTION PROCESS

Beginning with the qualitative scores, the top candidates for changes to higher-density residential (such as ISAs 540 and 250) were retained and set aside. The bottom candidates were either dropped or pulled aside and closely examined to see if modifications made sense.

The table of ISAs, the PALs, and staff's considerations follows below. Note that the qualitative scores pertain only to the residential parts (UM, UH) of the ISAs. There were no qualitative scoring criteria for the commercial (CM) parts. Also note that the column labeled "Considerations" incorporates scores, testimony, and further analysis as noted.

The maps of the ISAs and PALs are on pages 13–23.

ISA ID	**PAL** ID	**Considerations** scores, testimony, other analysis
140	140a-cm	Some lots along the eastern edge of this are already developed and some owners requested exclusion. The owner of a large part of this PAL supported the change. *Recommendation* — retain as modified: delete some developed lots on eastern edge
211	*n/a*	Qualitative score 4.2 This single large lot has the problem of low water pressure above a certain elevation, which on its own recommends a great reduction of the analyzed UH. In addition, the single owner is against any change, so it may be worthwhile to drop this from consideration entirely. *Recommendation* — **delete**
212	212a-um 212b-uh	Qualitative score 3.6 Finding a way to reduce the amount of UH in this area is complicated by its being on the edge of the urbanizable area, the location of Springbrook Road relative to that, a tier of single-family lots on its western edge (on Arrowhead Drive), and the shapes of the lots comprising ISA 212. Staff recommends a reduction of UH to a small area north and south of existing UR development to break up areas of UH, and introducing a patch of UM in the northwest remainder. *Recommendation* — retain as modified: reduce area of UH and change part to UM

ISA ID	**PAL** ID	**Considerations** scores, testimony, other analysis
213	213a-uh 213b-uh	Qualitative score 4.3 Taking a cue from the landowner's vision for ISA 930, and testimony that supported the concept of "building toward" a higher-density designation, this area was reduced in extent and pulled away from direct adjacency to built UR neighborhoods. Its location on the future extension of Springbrook was retained. *Recommendation* — retain as modified: reduce area of UH
214	214a-cm	There was no opposition to this change. *Recommendation* — retain as analyzed: CM
215	215a-ur 215b-cm 215c-uh	Qualitative score 4.0 The UH score was high. It is located between the CM area and other UH to the east. There was no opposition to the CM change. UR is recommended at the northeast corner because the Owen Drive extension severed a lot and left a useless triangle of GI on the north side of the street. *Recommendation* — retain as analyzed: CM, UR, UH
216	216a-cm	There was no opposition to this change *Recommendation* — retain as analyzed: CM
n/a	217a-cm 217b-cm 217c-cm 217d-cm	Inclusion request These four lots are largely vacant. The two north lots are UR and the south lots are GI. They lie immediately to the north of PAL 216a-cm. Their inclusion benefits the objective of this project.
240	*n/a*	Qualitative score 3.8 Many of the property owners objected to a change from UR to UM, and the neighborhood was also opposed. Consultation with colleagues in the development division also revealed some of the problems inherent in the site that make development of any kind problematic; specifically, bridging the stream running across the southern end of the area to provide access to Lone Pine Road. Access and circulation constraints in an area already riddled with cul-de-sacs would not be helped by increased density. *Recommendation* — **delete**

ISA ID	**PAL** ID	**Considerations** scores, testimony, other analysis
250	250a-um	Qualitative score 4.5 The church that occupies the northern third of this lot may or may not develop the remainder, yet this PAL has the benefits of proximity to transit and adjacency to UH and North Medford H.S. *Recommendation* — retain as analyzed: UM
310	*n/a*	Qualitative score 2.5 Analyzed for changes to UM and CM, the topographic and hydrologic constraints in this area became more apparent on closer examination. Most of the lots in this area are not very deep to begin with and are further constrained by steep slopes and canals. *Recommendation* — **delete**
n/a	320a-cm	Inclusion request Half of this lot has a CM GLUP. The proposal to is change the whole lot to CM. While its inclusion would achieve one goal—increasing the amount of CM in the urban area—the change would increase the deficit of UH land. The resulting conflict is of a relatively small scale.
510	510a-cm 510b-uh	Qualitative score 3.8 The piano-like shape of ISA 510 exactly describes a swatch of UR amid a blanket of CM, GI, and HI between the interstate and Highway 99. The construction of the new South Medford Interchange rerouted Garfield through this area. Despite its middling score—due in large part to the parcelization along Charlotte Ann Road—it would not do to retain this as UR. There was no opposition from this area and one letter of support. *Recommendation* — retain
540	540a-cm 540b-um 540c-uh 540d-um	Qualitative score 4.6 This area scored very well for residential. The northerly strip that was analyzed for conversion to UM from CM, however, appears to staff on reflection to be counter to the objective to find more CM land in the City. Staff therefore recommends removing it. Staff also changed its recommendation to include UH in the southern half of this area because of large reductions elsewhere. Also, an approval here would "orphan" some strips of UR land sandwiched between this ISA and the PS designation to the west. Staff recommends adding these to PAL (proposed amendment

ISA ID	**PAL** ID	**Considerations** scores, testimony, other analysis
		location) 540 with CM and UM designations. *Recommendation* — retain as modified: change north UR strip to CM; remove UM from CM lot at north end; change part of UM to UH; add small lot at southwest as UM
620	*n/a*	Qualitative score 2.9 The parcelization of this area, low score, and its lack of a CM component left it with little to recommend changing it to UM. Testimony highlighted the poor state of infrastructure in the area and lack of transit. *Recommendation* — **delete**
630	630a-uh 630b-um 630c-cm	Qualitative score 3.1 Irregular parcelization and a middle-low score led staff to recommend retention only of the CM, part of the UM, and the addition of a few acres of UH on the future extension of Cunningham/Willow. *Recommendation* — retain as modified: reduce UM, retain CM, add some UH
640	640a-um 640b-uh 640c-cm	Qualitative score 3.6 A middling score and some letters of support in this area were balanced against the irregular parcelization, resulting in a recommendation to reduce some of the chopped up UM and retain the UH, although it should be noted that would put UH up against the backs of several UR lots fronting on Windward Drive. Staff also recommends extending the CM one lot eastward to capture an existing auto repair business. There were two letters of support from the vicinity. *Recommendation* — retain as modified: reduction in CM and adjustment of CM
670	670a-um 670b-uh	Qualitative score 3.2 Irregular parcelization and a middle-low score led staff to recommend retention of the UH portions and reduction of the UM. Note that the addition of CM on the other corner (PAL 640c-cm) would increase the qualitative score for the UH. *Recommendation* — retain as modified: reduce UM and retain UH

ISA ID	**PAL** ID	**Considerations** scores, testimony, other analysis
n/a	680a-cm	Inclusion request In this request, the larger lot on the corner of Garfield Street and Kings Highway is vacant, the smaller lot has a house on it. Their inclusion would benefit the objective of this project.
718	718a-uh 718b-cm	Qualitative score 4.8 The north lot scored the highest out of the ISA group. The owner requested changing the entire lot to UH instead of leaving out the "panhandle." The one negative factor here is that the property owner of the southern portion opposed the change from UR to CM. The reason staff recommended the change was so that there was not a pocket of UR trapped between CM on the south and UH on the north. *Recommendation* — retain as analyzed with modification: include all of north UH lot and change south lot to CM
719	*n/a*	Qualitative score 3.8 This was a UM recommendation left over from the West Main TOD land-use plan. It is a single third-of-an-acre lot with two structures on it; inclusion does not appear to be logical on re-examination. *Recommendation* — **delete**
730	730a-um	Qualitative score 3.6 A change here would render little in the way of new UM capacity given that it is already developed, but the change may provide an incentive to redevelop—aided perhaps by an urban renewal district with the power to assemble land for redevelopment. This area is too well situated to remain UR. There was one letter of support from an owner in the area. *Recommendation* — retain as proposed
740	740a-cm	The purpose of this PAL is to correct the GLUP so it matches the commercial zoning and uses. *Recommendation* — retain as proposed
750	750a-cm	The purpose of this PAL is to correct the GLUP so it matches the commercial zoning and uses. *Recommendation* — retain as proposed

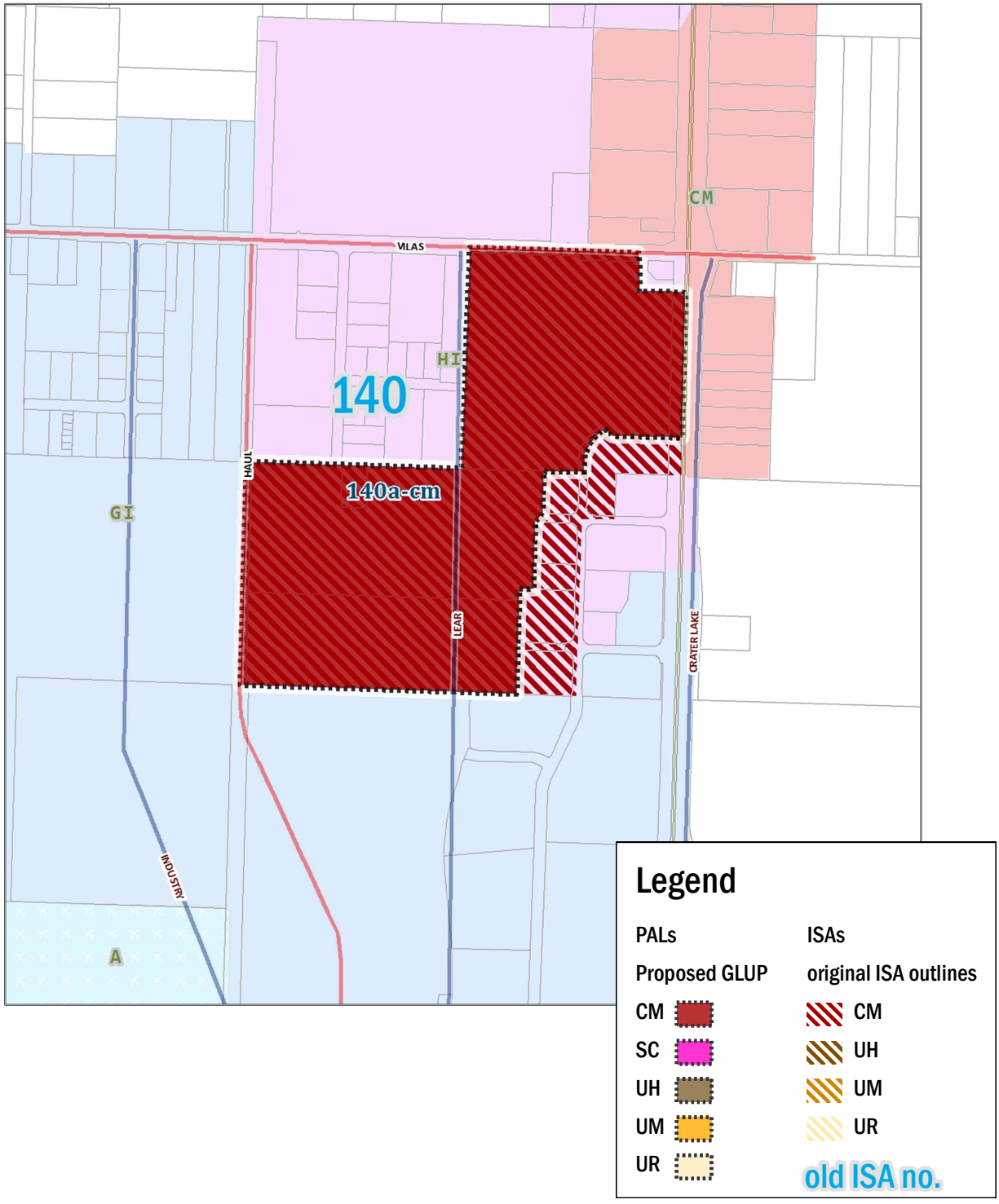
ISA ID	**PAL** ID	**Considerations** scores, testimony, other analysis
760	760a-cm	The purpose of this PAL is to correct the GLUP so it matches the commercial zoning and uses. *Recommendation* — retain as proposed
810	810a-um	Qualitative score 3.8 Although parcelized, a large part of this is classified redevelopable or partially developed. Leaving select parts out would create small insinuations of UR into a solid block of UH on the north and south. Its only real deficit is the parcelization; all the other factors score very well for this area. There were no objections from this vicinity. *Recommendation* — retain as proposed
930	930a-um 930b-cm 930c-um 930d-cm	Qualitative score 3.3 Despite a middle-low score, the opportunity for a mixed-use area of CM and UM (which would increase its score), plus the willingness of the land owners to work toward a solution, recommended this area for retention. *Recommendation* — recommend land owner's modified suggestion of approximately 11 acres of UM (in two spots) and approximately 13 acres of CM (in two spots) in the southeastern corner at Hillcrest and Foothill Roads.
940	940a-cm 940b-um	Qualitative score 3.6 Much of the attraction of this area stems from the opportunity to introduce CM into an area that lacks commercial within anything but automobile distance, but review of the south lot makes the slope on it less suitable for CM designation; therefore, staff proposes moving the CM to the north lot and reducing the UM on the south half to allow UR to build toward the higher density. *Recommendation* — retain as modified: shift CM to north lot and reduce UM to smaller area at the northwest corner of the south lot
950	950a-um	Qualitative score 4.3 This scored well, but the irregular shape of the analyzed lot would introduce UM adjacent to a number of backyards. Following the principle of "building toward" the higher-density designation, staff recommends reduction of the area to the northwest third. *Recommendation* — retain as modified: reduce UM

ISA ID	**PAL** ID	**Considerations** scores, testimony, other analysis
n/a	960a-sc	Inclusion request Applicant requests a change on parts of two lots from UH to SC. While the loss of UH is counter to the objective of this project, the current use of this lot as a school means that it is not available for its primary purpose anyway. The resulting conflict is of relatively small scale.

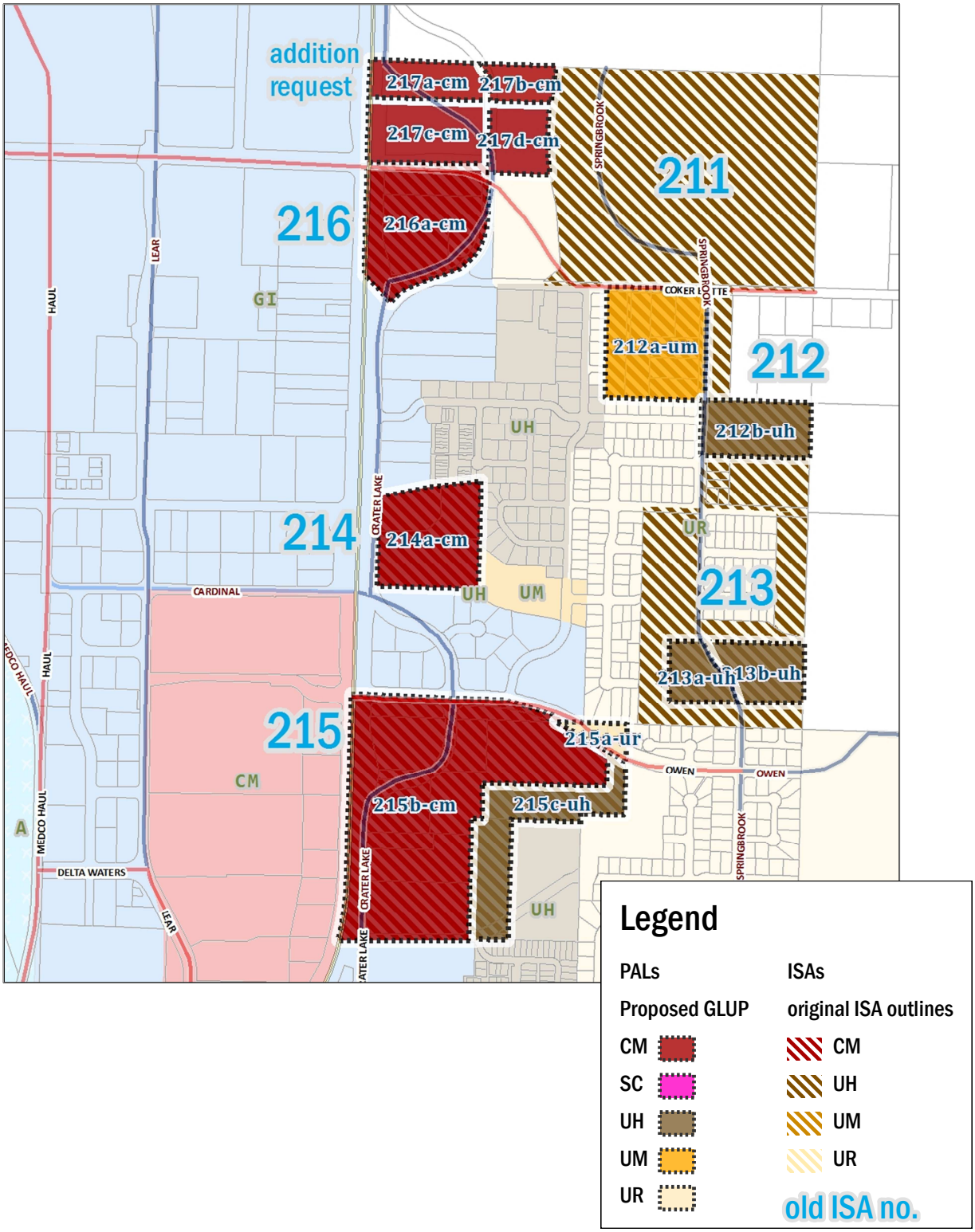
Maps begin on following page.

MAPS—PROPOSED AMENDMENT LOCATIONS

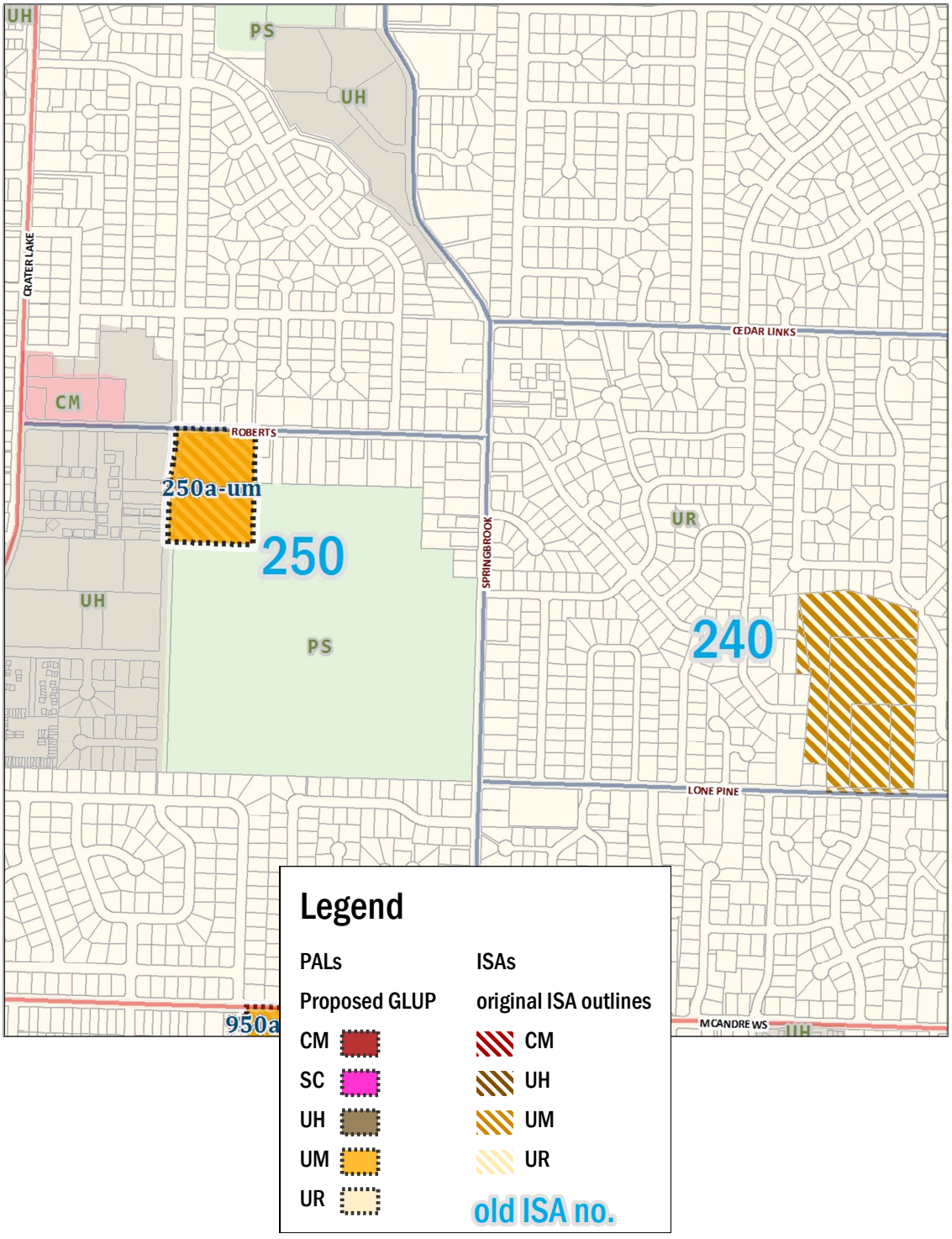
Map 1 PAL 140 North



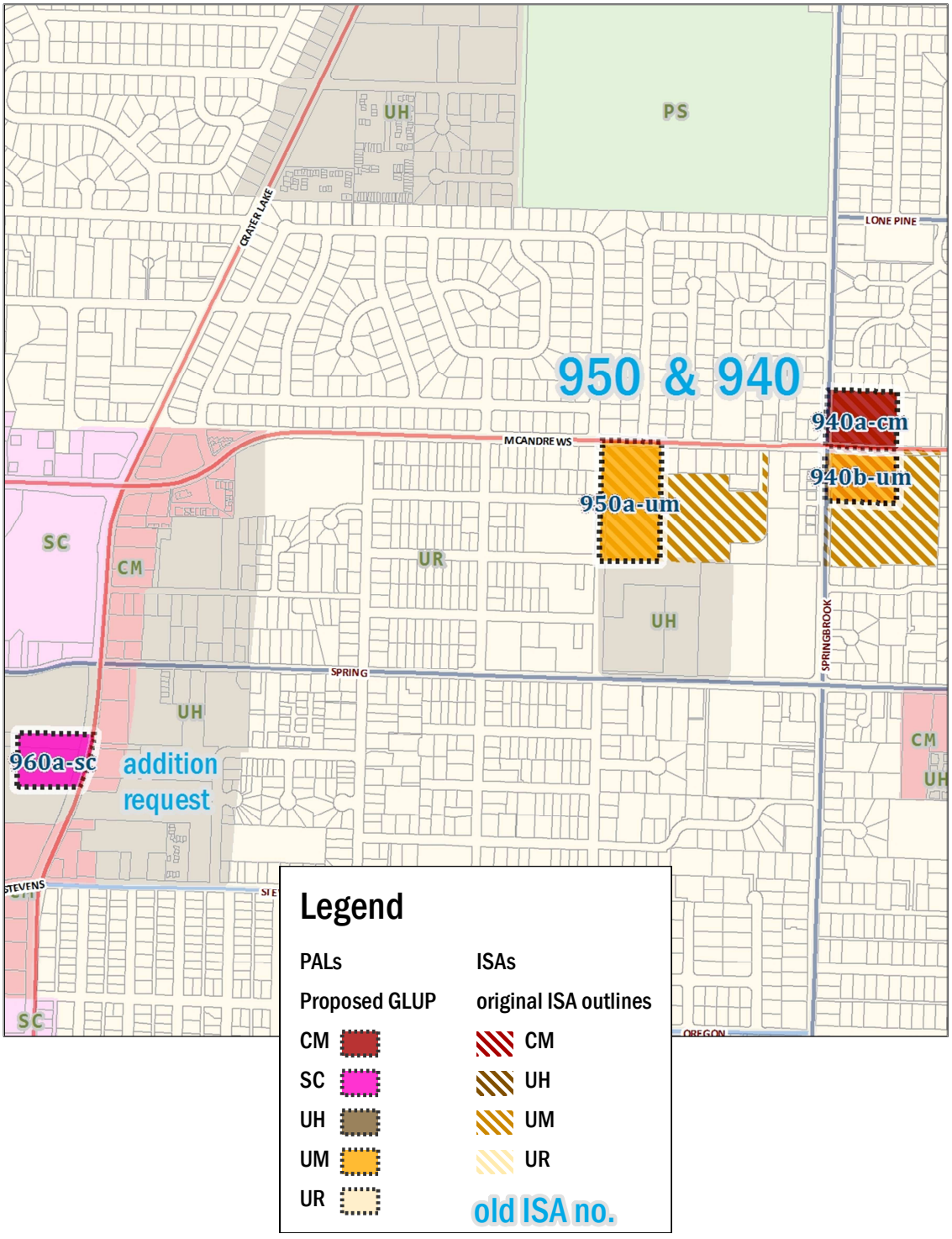
Map 2 PALs 212–217 North-Northwest



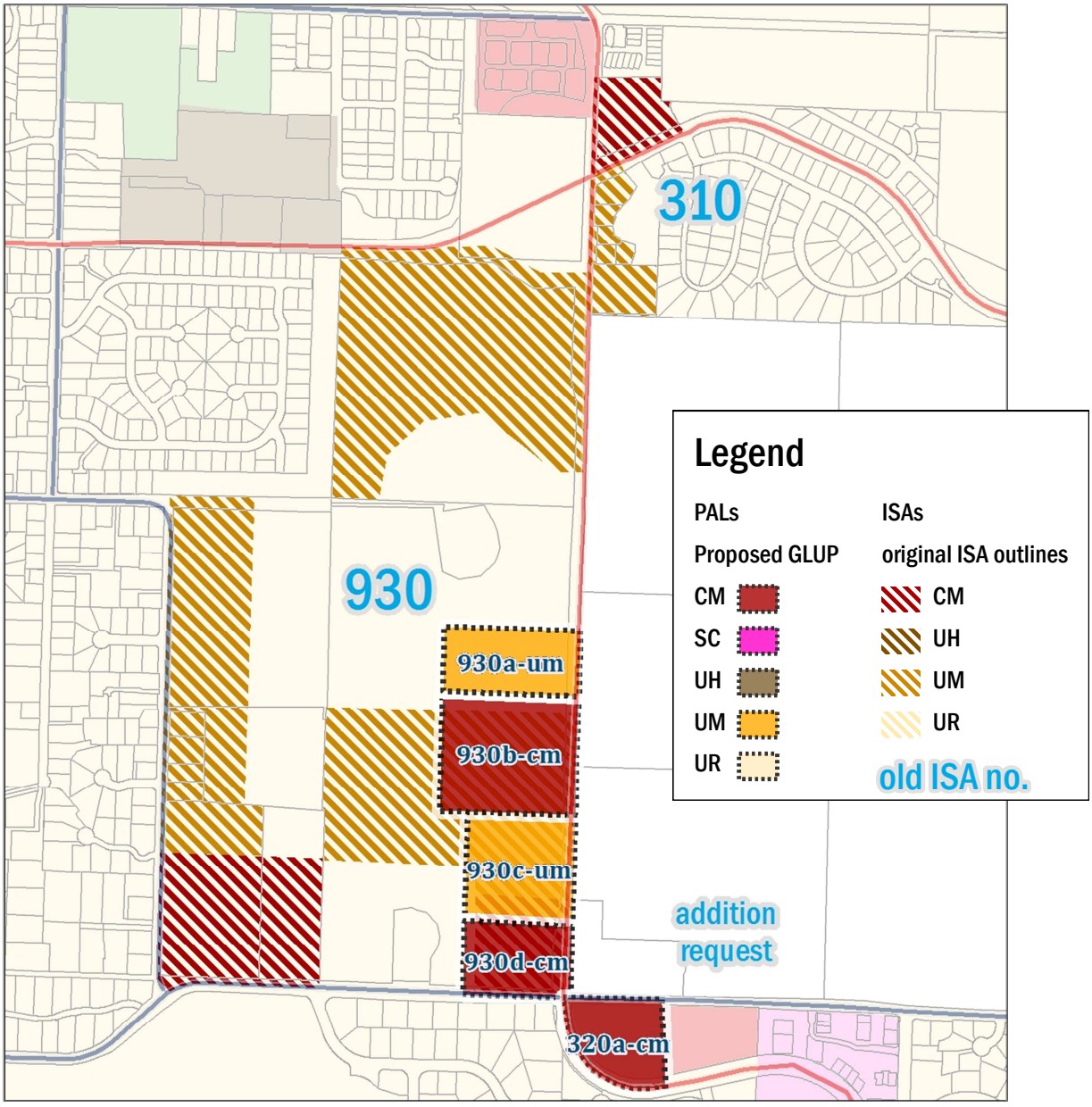
Map 3 PAL 250 East Central



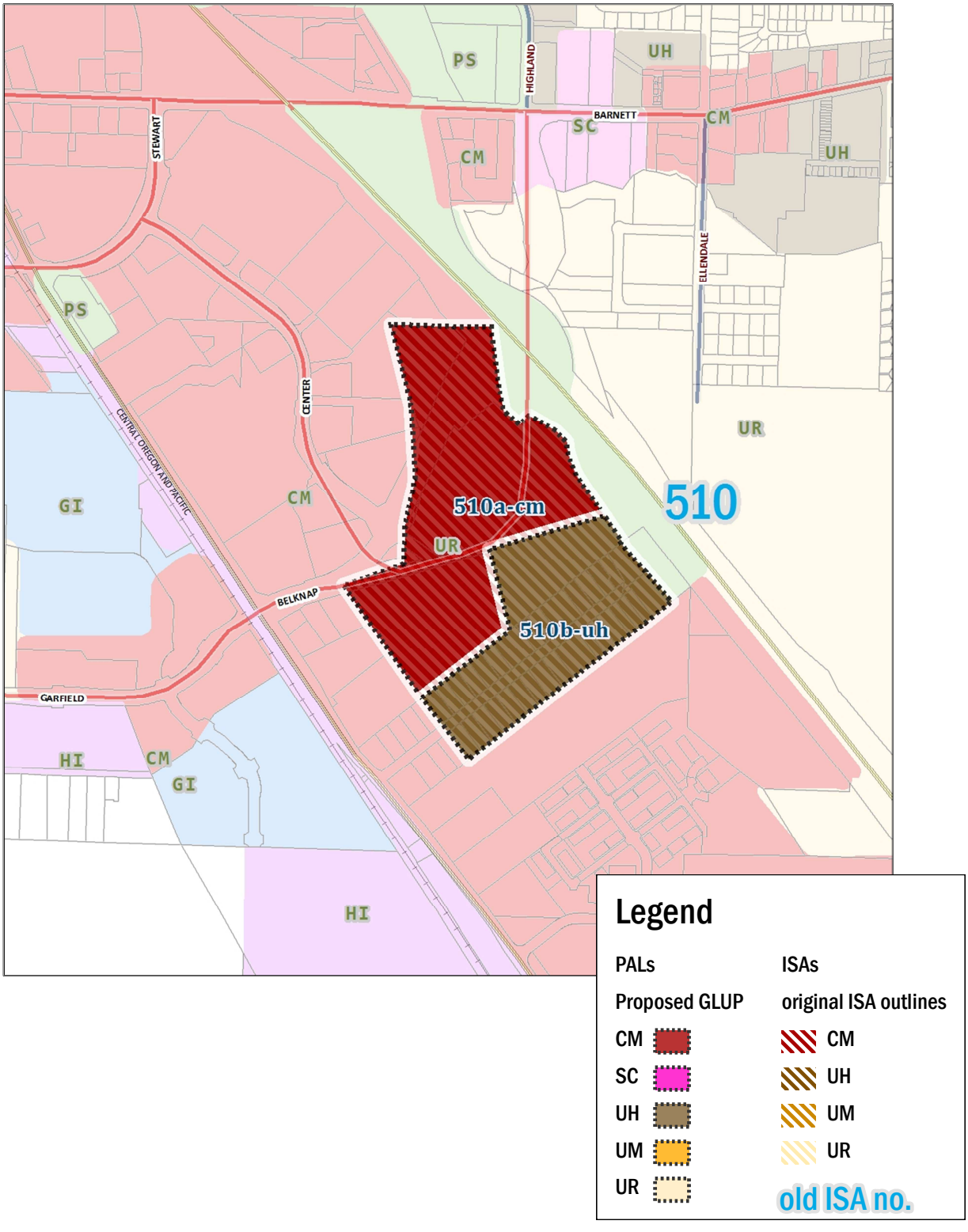
Map 4 PALs 940–960 East Central



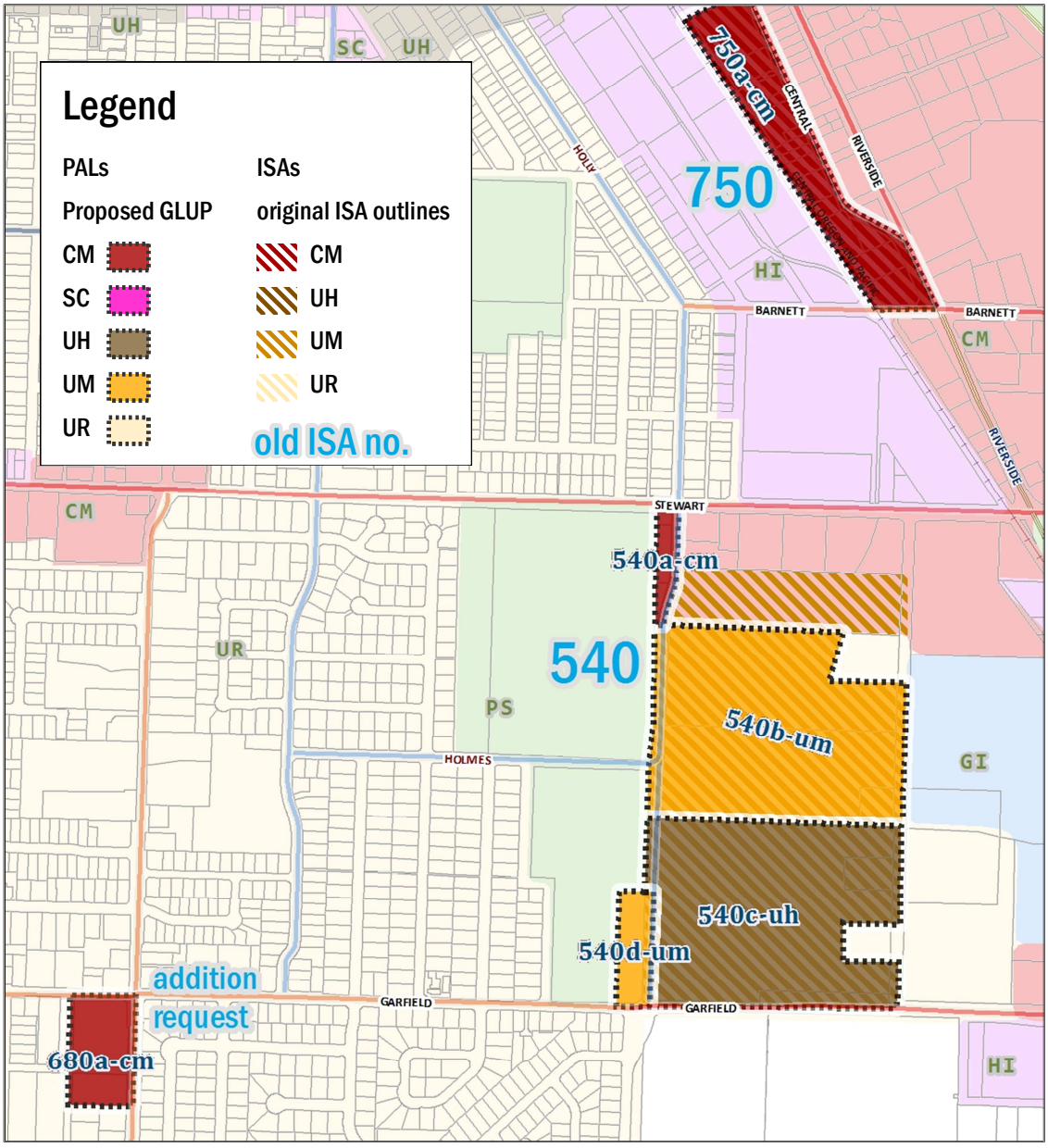
Map 5 PALs 320 and 930 East



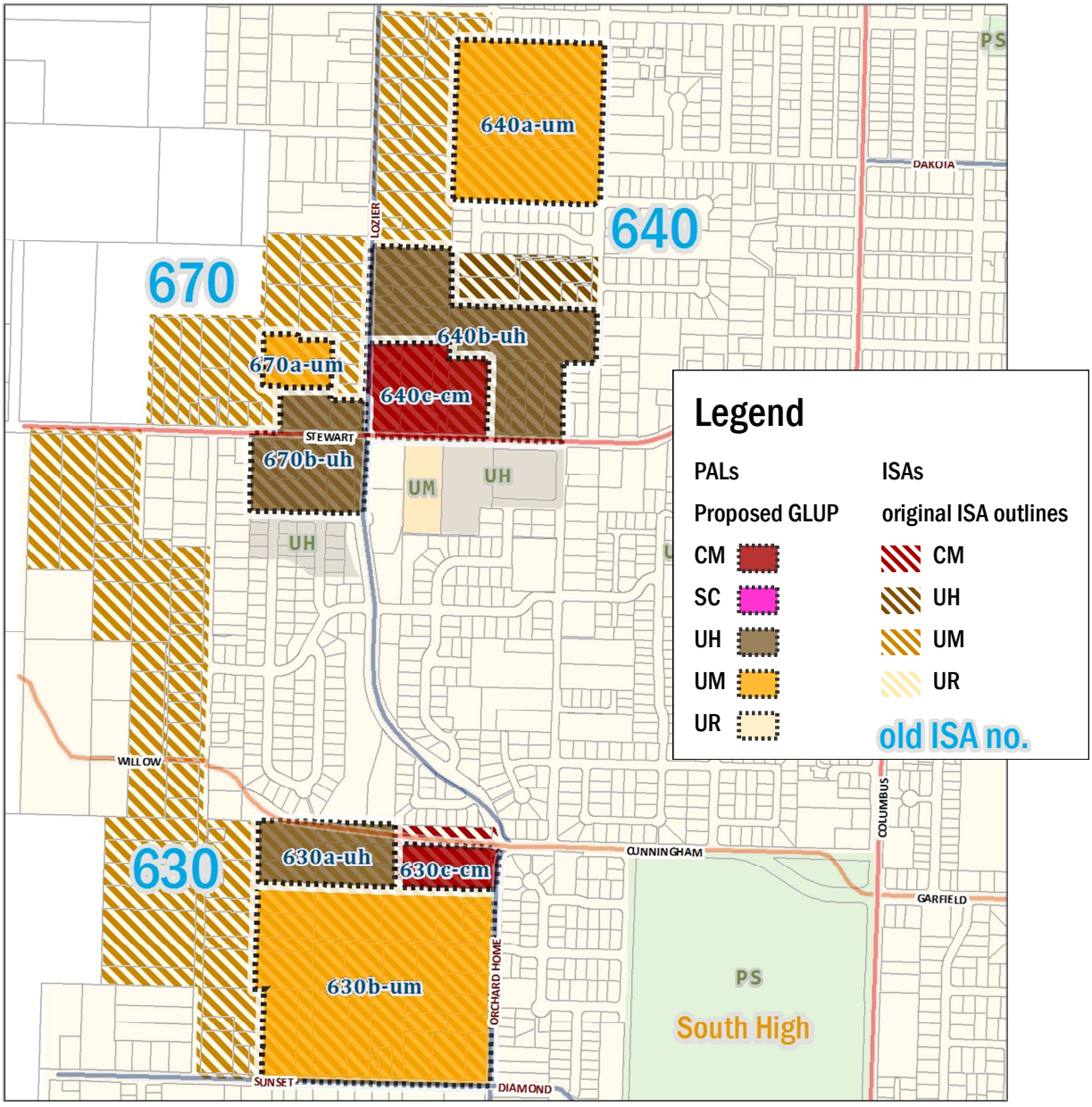
Map 6 PAL 510 South Central



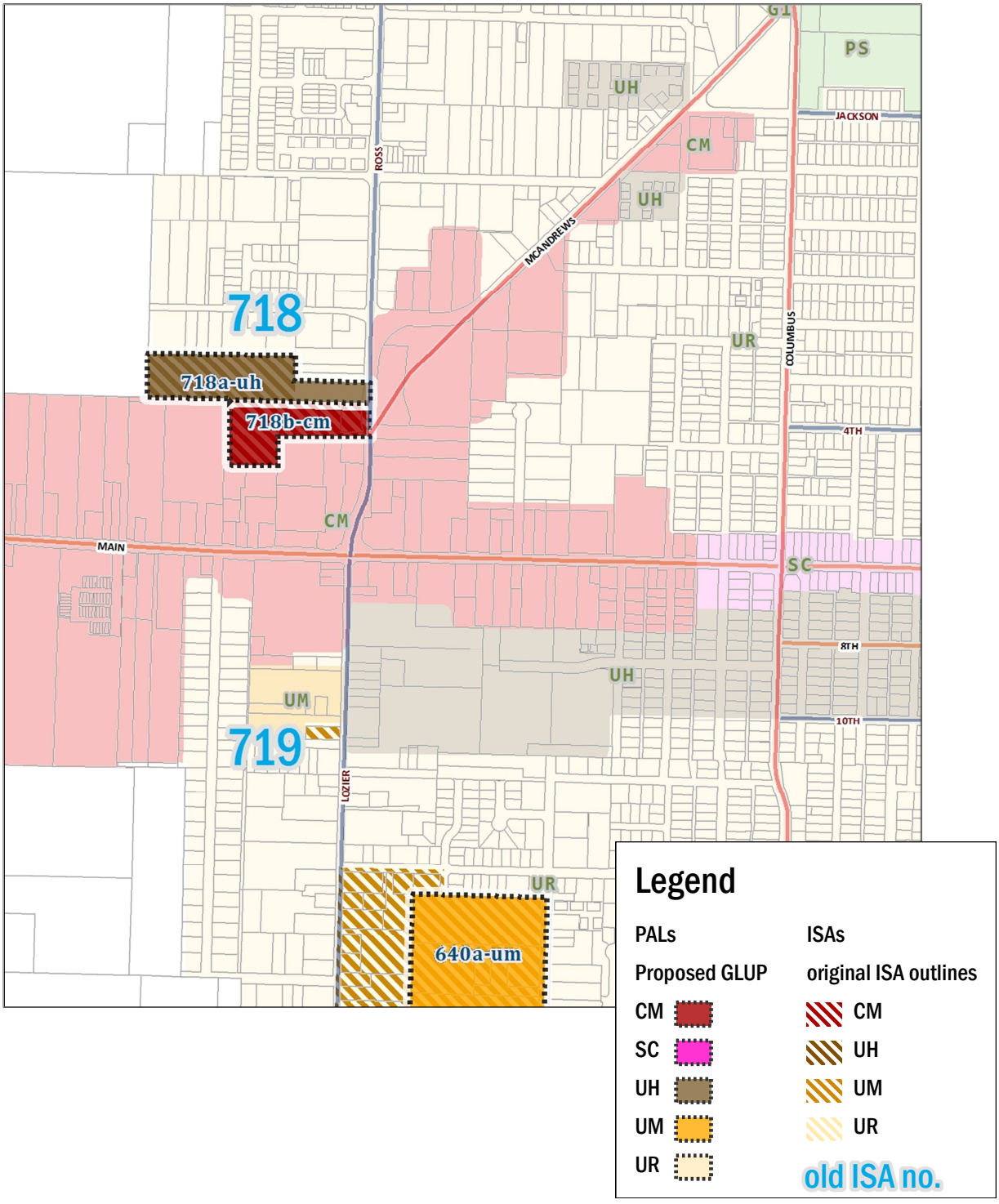
Map 7 PALs 540, 680, and 750 South-Southwest



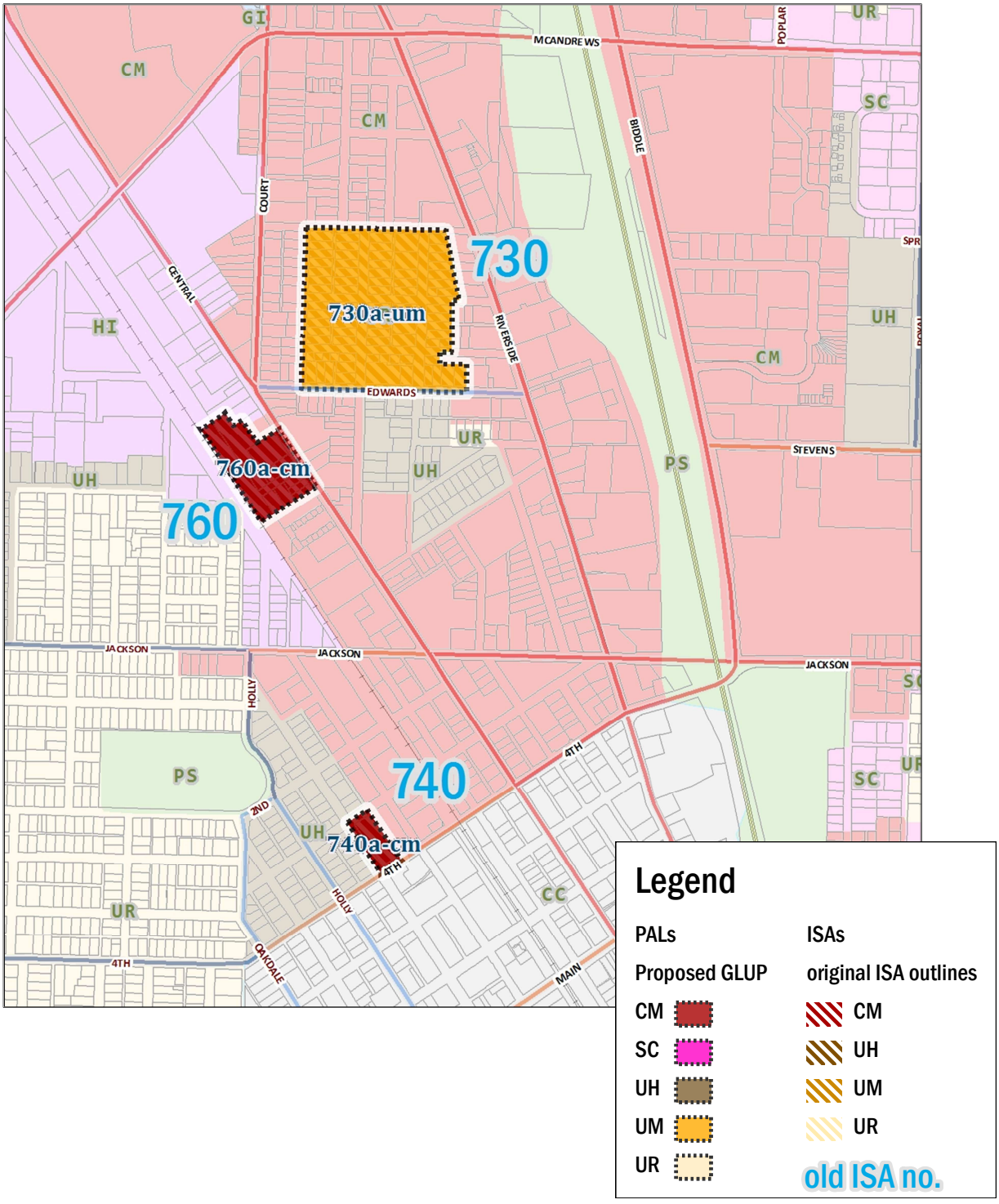
Map 8 PALs 630, 640, and 670 Southwest



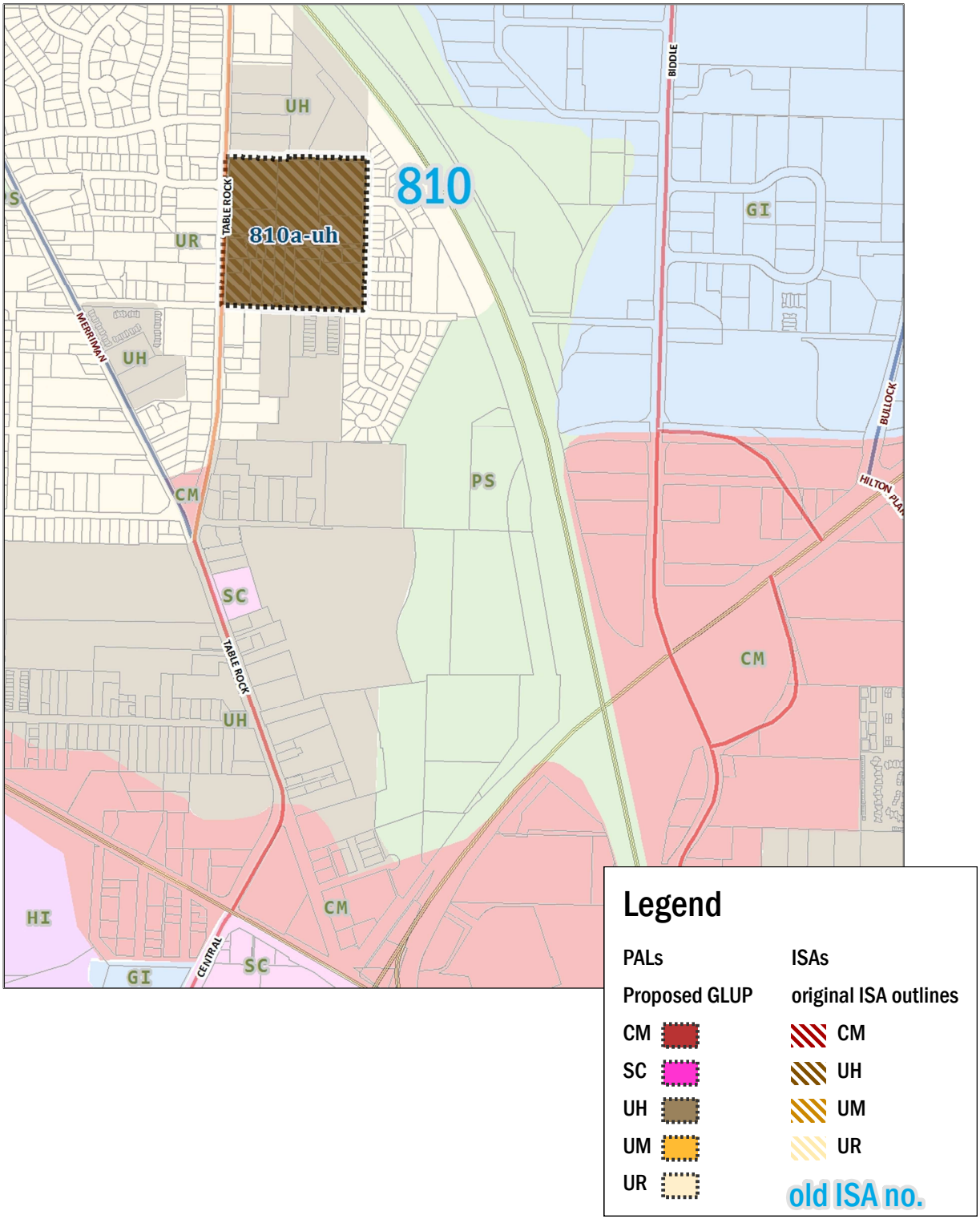
Map 9 PAL 718 West



Map 10 PALs 730, 740, and 760 West Central



Map 11 PAL 810 Northwest



PAL TABLE

Proposed Amendment Location data

Note: the figures include adjacent rights-of-way, so the PALs as shown below are larger than just the lots comprising them.

PAL no.		Acres	Existing GLUP	Proposed GLUP
140	a-cm	85.9	HI	CM
212	a-um	9.2	UR	UM
212	b-uh	5.0	UR	UH
213	a-uh	2.6	UR	UH
213	b-uh	4.1	UR	UH
214	a-cm	8.5	GI	CM
215	a-ur	1.1	GI	UR
215	b-cm	33.2	GI	CM
215	c-uh	8.6	GI	UH
216	a-cm	11.8	GI	CM
217	a-cm	3.7	UR	CM
217	b-cm	2.0	UR	CM
217	c-cm	6.6	GI	CM
217	d-cm	3.6	GI	CM
250	a-um	7.1	UR	UM
320	a-cm	4.9	UH	CM
510	a-cm	37.9	UR	CM
510	b-uh	23.1	UR	UH
540	a-cm	1.3	UR	CM
540	b-um	28.3	UR	UM
540	c-uh	27.4	UR	UH
540	d-um	2.4	UR	UM
630	a-uh	5.6	UR	UH
630	b-um	30.4	UR	UM
630	c-cm	2.9	UR	CM

PAL no.		Acres	Existing GLUP	Proposed GLUP
640	a-um	15.7	UR	UM
640	b-uh	14.5	UR	UH
640	c-cm	7.2	UR	CM
670	a-um	2.2	UR	UM
670	b-uh	8.3	UR	UH
680	a-cm	4.4	UR	CM
718	a-uh	6.4	UR	UH
718	b-cm	5.1	UR	CM
730	a-um	19.4	UR	UM
740	a-cm	1.2	UH	CM
750	a-cm	11.5	HI	CM
760	a-cm	4.9	HI	CM
810	a-uh	17.7	UR	UH
930	a-um	5.8	UR	UM
930	b-cm	10.9	UR	CM
930	c-um	7.9	UR	UM
930	d-cm	5.2	UR	CM
940	a-cm	3.0	UR	CM
940	b-um	2.9	UR	UM
950	a-um	5.4	UR	UM
960	a-sc	2.9	UH	SC

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 criteria in the "Review and Amendments" section of the Comprehensive Plan for amendments to map designations.

APPROVAL CRITERIA COMPLIANCE

Comprehensive Plan—Review and Amendments section: Map designation amendments shall be based on [criteria 1–7, as follow]:

Criterion 1. A significant change in one or more Goal, Policy, or Implementation Strategy.

Findings

There are many existing goals, policies, and implementation measures that support the concept of utilizing existing urban area more efficiently.[2] Implementation measure 1-5-b in the Economic Element of the Comprehensive Plan recommends "Reduc[ing] projected deficits in employment lands by changing GLUP Map designations within the existing Urban Growth Boundary." And implementation measure 3-A in the Housing Element recommends "Assess[ing] policies, regulations, and standards affecting residential development and pursue amendments as needed to meet Policy 3. Consider actions such as: (a) upzoning buildable land to medium and high density residential."

The recently adopted Regional Plan Element specifically requires participating cities to increase their housing density. It contains implementation strategies (called "performance indicators" in the Regional Plan) that require and encourage the efficient use of existing urban area to meet 20-year land needs.

Conclusions

This amendment is not based on a significant change to any goal, policy, or implementation strategy. 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, and in particular subsection (6), which recommends addressing the need by expanding the urban

[2] This is covered in detail under Criterion no. 6, below.

growth boundary, by increasing the developable capacity of the urban area, or by a combination of the two.

Criterion 2. Demonstrated need for the change to accommodate unpredicted population trends, to satisfy urban housing needs, or to assure adequate employment opportunities.

Findings

Economic Element

The Economic Element[3] projects employment land need for 2008 through 2028 in the following categories and quantities:

Table 2.1. Employment Land Need
(adapted from *Figure 28* in the Economic Element)

Type	Need, in gross acres[4]
Service Commercial (office)	(290)
Industrial	213
Commercial	(278)
Other	(354)
Total	(**709**)

The "Other" category is described in the Economic Element as "overnight lodging" and "special uses," such as campus-type development. For the purposes of identifying land uses, however, the City has four employment designations, CM, SC, GI, and HI. Since the "Other" acres need to be put into a category, 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 categories, a two-way partition (126 acres each) into those would result in a redistribution. The other 31 net acres in the "Other" category are for overnight lodging; that can be placed in the CM category.

These changes result in a revised *table 2.1*:

[3] Adopted December 4, 2008.
[4] Gross acreage figures were derived by staff from guidance in the paragraph following *Figure 28*.

Table 2.1. –revised– Employment Land Need
(adapted from *Figure 28* in the Economic Element)

Type	Need, in gross acres
Service Commercial (office)	(448)
Industrial	55
Commercial	(316)
Other	—
Total	(**709**)

Note: This distribution is not fixed. The City may decide to devote more land to the SC category instead of to the Industrial.

Although there is a 700-acre need for employment land, there is actually a 55-acre surplus of industrial land overall. Some of that surplus is under consideration for conversion to Commercial designation. However, note in *Table 2.2*, below, that the City will need 19 small industrial sites (ranging up to six acres, but typically about 1.5 acres) totaling 76 acres (*Table 2.3*) over the next 20 years.

Table 2.2. Industrial Land Need—demand, supply, and balance by number of sites
(adapted from *Figure 27* in the Economic Element)

	Size/type *[typical acreage*	Large *30*	Medium *6*	Small *1.5]*	Total
Demand	no. of sites	(4)	(25)	(135)	(164)
Supply	vacant	13	52	107	172
	redevelopment	1	9	9	19
Balance	no. of sites	10	36	**(19)**	27

Table 2.3. Industrial Land Need—demand, supply, and balance by acres
(adapted from *Figure 28* in the Economic Element)

	Size/type *[typical acreage*	Large *30*	Medium *6*	Small *1.5]*	Total
Demand	net acres	(121)	(148)	(202)	(471)
Supply	vacant	207	206	122	535
	redevelopment	50	37	19	106
Balance	net acres	136	95	(61)	170
	gross acres	170	119	**(76)**	213

Sixteen of the industrial-to-commercial PAL lots are less than six acres in size. If all were changed, the small-site deficit would increase to thirty-five sites and 92 net acres. As concluded below, the exchange is equitable because of greater need and because the surplus of large industrial lots can be broken into smaller lots.

The fifth conclusion of the "Employment Land Demand and Supply Conclusions" in the Economic Element notes that the "strong distinction between commercial and industrial designations…has become less appropriate as the distribution of firm activities has shifted over time and a greater mix of commercial and industrial activities are found within individual firm[s'] operations," suggesting that some commercial districts can be amended to include some of what are traditionally considered manufactory activities.

The Housing Element[5] projects housing land need for 2009 through 2029 in the following categories and quantities:

Table 2.4. Housing Land Need—Before adding capacity in extant UGB
(adapted from *Table 37* in the Housing Element)

Type	No. of new DUs	Percent *of need*	Density *DUs/gross acre*	Need *in gross acres*
Single-family detached	(9,034)	60%	4.5	(2,002)
Mfd. in parks	(395)	3%	6.0	(66)
Single-family attached	(384)	3%	11.0	(36)
Duplex	(651)	4%	12.3	(54)
Multi-unit	(4,586)	30%	20.3	(226)
Totals	(15,050)	–	(average) 6.3	(2,383)

Table 2.5. Housing Land Need—With capacity in extant UGB
(adapted from *Tables 39* and *41* in the Housing Element)

Plan Designation	Need *in dwelling units*	Capacity *in dwelling units*	Surplus/(Deficit) *in dwelling units*	Need *in gross acres*
UR	(10,036)	7,803	(2,233)	(465)
UM	(993)	495	(498)	(39)
UH	(3,329)	2,435	(894)	(49)
CM	(692)	691	(1)	–
Group Quarters	–	–	–	(16)
Public/Semi-public land	–	–	–	(426)
Totals	(15,050)	11,424	3,626	(**996**)

[5] Adopted December 2, 2010

As of 2009 the City had enough land to supply three quarters of the 20-year housing need (2009–2029), leaving a remaining need of nearly 1,000 acres. Goal 14 states "prior to expanding an urban growth boundary, local governments shall demonstrate that needs cannot reasonably be accommodated on land already inside the urban growth boundary," and Oregon Revised Statute (ORS) 197.296(6) states that when there is a need for whatever category of land-use type, a city should expand its boundaries, increase its capacity, or do a combination of both. The internal study areas were conceived as the means to increase the capacity of the existing urban area.

In order to express the land need in terms of the three residential GLUP categories, the 426 acres of "Public and semi-public land" need to be assigned to one or more of them; a proportional distribution is appropriate: 84% to UR, 7% to UM, and 9% to UH[6]. "Group Quarters" also need to be assigned to GLUP categories. Since the larger group quarters are allowed only in the MFR-15 through MFR-30 zoning districts, it is reasonable to distribute them largely to the UM and UH categories, which correspond to those zoning districts: 20 percent of the 16 acres was distributed to the UR category, and 40 percent to each of the other two. Table 2.6 shows the totals after the allocations.

Table 2.6. Housing Land Need—Distributed into the three residential GLUP designations (adapted from *Table 2.5, above*)

Plan Designation	Need *in gross acres*
UR	(826)
UM	(75)
UH	(93)
Total	(**996**)

Conclusions

Since there is a demonstrated need for employment land, seeking a means to increase the development capacity of the urban area by changing excess industrial land into needed commercial land is a rational response to that need.

Although there is already a deficit in the "small lot" category of industrial land that would be increased by the industrial-to-commercial PALs, there are enough large industrial lots that can be subdivided into smaller lots as market conditions demand it. Given the greater need for commercial land, the exchange is justifiable. In addition, there are use changes that can be considered that would make small industrial

[6] For example, UR proportion = 465/(465+39+49)

uses viable in commercial zoning districts; the Economic Element contained a similar recommendation.

Since there is a demonstrated need for housing land, seeking a means to increase the development capacity of the urban area by changing the designations to allow more dwelling units per acre is a rational response to that need.

With a quantifiable need for both employment and residential land, ORS 197.296(6) requires the City to accommodate the need by either intensifying within the current urban area, expanding the urban area, or a combination of both. While the City has the option of expanding the urban area without intensifying to accommodate future land needs, both the State and City policies strongly support utilizing land more efficiently within the urban area (as outlined under Criterion 1). As a result, the City has chosen to consider intensification prior to expansion as a first step toward satisfying projected housing and employment land need.

Criterion 3. The orderly and economic provision of key public facilities.

Findings

In nearly all cases water and sewer utilities are available to the sites and can handle the changes without upgrading the facilities. For some areas an upgrade is necessary. Notably, the same finding would be true if the PALs were not considered and all the land need were satisfied through an urban growth boundary expansion.

Transportation is the most visible public facility because most people interact with it directly daily. A grant-funded study of impacts to the transportation system found that, if all ISAs were approved and built out, it would lead to failures of several intersections throughout the City in 2028, the analysis year for the study. It is worth noting that the analysis placed the forecasted 2028 population entirely within the existing urban area, so whether that population is inside or on new lands that have been brought into the urban growth boundary, it is the same population figure for both.

Although the ISA traffic analysis shows many failures, it is a reasonable assumption that many of the same failures, or a similar number of failures, would result from a non-ISA scenario; that is, some part of the future population will be located in land that is added to the urban area through a boundary expansion.

It is also important to note that the various analyses were performed assuming that all the internal study areas had developed to their full potential. Since the PAL potential is less than the ISAs', the number and degree of impacts will be much less. In fact, any single PAL might be rezoned without seriously impacting any facilities; there are probably a few where that would easily be true. It remains for the full UGB

amendment—internal plus expansion—to determine the transportation facility needs.

Note that the study examined the ISAs, not the PALs. The difference between the two is very large (3,400 dwelling units versus 1,600), so the results of the analysis are not valid for estimating transportation impacts.

Conclusions

An urban growth boundary expansion would require both extension of services and "downstream" upgrades to handle the additional demand. Intensification in the existing urban area would only require some upgrades. From this it is clear that utilizing existing facilities to serve a portion of the City's 20-year land need is less expensive than extending facilities to serve the same group on virgin land further out. There is also a long-term fiscal advantage in that there will be fewer miles of water and sewer lines for the City to maintain. Therefore, intensification within the current urban area is a more orderly and economical way to provide key public facilities to serve the projected population than expanding the urban area.

The Transportation System Plan as well as all the other master plans for key public facilities will be updated as part of the entire UGB amendment before being acknowledged by the State or prior to annexation.

Criterion 4. Maximum efficiency of land uses within the current urbanizable area

Findings

The purpose of this project was to find locations were the development capacity of the existing urban area[7] could be increased by changing the General Plan classification. The capacity of the current urban area is 11,400 dwelling units. If all the residential PALs were approved it could add a significant number of dwelling units to the current urban area's capacity. Additionally, converting unneeded industrial land to commercial will decrease the need to expand the urban area.

Conclusions

The primary purpose of this amendment is to provide maximum efficiency of land uses within the current urban area prior to considering expansion of it to meet the projected land need. Changing the GLUP designation from a surplus type to a deficit type on vacant land in the existing urban area is an increase in the efficiency of that land.

[7] "Urban area" is defined in OAR 660-024-0010(10) as "the land within a UGB".

Criterion 5. Environmental, energy, economic and social consequences

The general findings and conclusions for the proposed amendment locations follow. Particular considerations from which the PALs were derived from the original set of ISAs are documented above, under "Recommendation & PAL Selection Process."

Findings—Environmental

The study areas, being inside the UGB, have already met the test concerning environmental impacts; change of designation does not affect suitability for urbanization. A few PALs have wetlands and floodplains. Those areas are considered presently suited for development regardless of such factors.

In a no-change scenario these areas will have such protections as required by code and have such impacts as have already been accounted for by their inclusion in the urban area. Any PAL change will still have the protections required by code and have impacts similar to what would be expected under current GLUP designations.

Conclusions—Environmental

For any of the PALs it can be concluded that there will be no adverse environmental effect because none of these study areas is new to the urban area; most have been within the urban growth boundary either since its establishment in the late '70s or the last amendment in 1990, which means the decision to urbanize was made decades ago and these areas have been legally committed to eventual development ever since. A change to the use or density is not a matter for environmental consideration after land has already been committed to development. In addition, most sensitive areas, especially those with steep slopes, were dismissed from consideration for intensification early in the selection process.

Findings—Energy

Several PALs on their own or in combination with nearby mixed land-use areas with higher densities and commercial land could be part of intensive commercial–residential nodes. This type of development encourages the use of travel modes other than driving, leading to a reduction in vehicle miles travelled. No change to the area would confer no energy benefits, and may, in fact, be more energy consumptive since the need would be placed outside the current urban area, leading to more vehicle miles travelled.

Conclusions—Energy

The fact that many needed houses and jobs would be efficiently contained in the current urban area 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."[8] And as noted in an online edition of "The Atlantic" magazine[9]:

> 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.[10]

Findings—Economic

The changes would generally provide more residential density in areas that could take advantage of the proximity of jobs, shopping, and services. Likewise, the increases in commercial land are intended to take advantage of underserved areas. In conjunction with other PALs, many of the study areas could be part of intensive commercial–residential nodes. Increasing the capacity of the existing urban area will help slow the extension of streets and other utilities which require maintenance expenditures over their lifetimes. No change would displace the housing and commercial needs to locations outside the current boundary, meaning longer extensions of streets and utilities and greater long-term maintenance costs. There would also be cumulative increases in trip lengths, increased congestion (with less recourse to other transportation choices), and air quality degradation.

Conclusions—Economic

Although there are positive and negative economic effects, the overall effect is a little better than neutral. There is some potential for conflict between commercial and industrial zoning, but those are addressed by development code provisions, such as buffering. For both employment and residential study areas there will be collective benefits in reduced VMT and reduced road construction and maintenance costs.

Findings—Social

The changes would provide needed housing types within the existing urban area; many of the study areas are close to schools, other high-density residential, and

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[8] 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.

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

[10] For reference to commuting studies see «http://www.economist.com/blogs/gulliver/2011/06/perils-commuting»

transit. No change would push the needs elsewhere, which could include areas further out from goods and services, requiring further travel and a limited choice of travel modes. Many of the PALs, if approved, also would result in a greater spatial distribution of high- and medium-density areas into relatively small pockets closer to the city center. A no-change scenario would require placing the needed higher densities in the urban reserve, with little chance that high-enough densities would make it worthwhile to extend or reroute transit services.

For the PALs aimed at increasing residential densities, the low-density home owners in the vicinity may perceive a threat to property values or social character, an incompatible built environment, and increased traffic. Traffic volumes and property values are mensurable, neighborhood character is not; of these factors the former are verifiable and the latter is a matter of individual taste. These will be treated individually.

> *Traffic*. That traffic volumes would be higher in the vicinity of PALs that change from low density to a greater density is undeniable. The benefits would be felt only across a larger area, where there would be a reduction in motor vehicle miles traveled. The distribution of burden always has imbalanced effects, but a fairer distribution lessens the impacts in the areas that take on more burden.
>
> *Property Value*. Various studies[11] indicate that medium- or high-density residential development does not inherently lower the value of low-density property nearby, and quite often a well-designed and well-managed development can revitalize a neighborhood and lead to increased property values. The City can facilitate this outcome by developing design standards geared toward better integration of a range of densities.
>
> *Compatibility*. Having a set of design/performance standards would make new development at higher densities more commensurate with their neighborhoods. This idea is found in the Comprehensive Plan and has been advocated by some City Councillors.

Impacts are sensitive to scale and location, which is why the Planning Commission and staff developed the set of qualitative screening criteria to identify which residential ISAs have qualities that support the changes. These criteria aided in the development of the PALs:

[11] For example: Ellen, I. G., Schwartz, A. E., Voicu, I. and Schill, M. H. (2007), Does federally subsidized rental housing depress neighborhood property values?. J. Pol. Anal. Manage., 26: 257–280. doi: 10.1002/pam.20247.

Parcelization

Development projects work better when there is more area to work with. If a development lot is too small, the resulting multi-family project will consist of a building surrounded by parking lot. In order to create a project that is more pleasant for inhabitants and neighbors, a larger area is superior.

Proximity to elementary schools, grocery stores, and transit routes

These three tests measure quality-of-life factors that both relieve pressure on the transportation system and provide more choices of nearby goods and services to higher concentrations of residents.

Size and Mix

This test considers the "texture" of the surrounding quarter mile fringe for residential ISAs that (1) were analyzed for conversion to UH and (2) are less than 15 acres. For these UH-conversion ISA lots staff calculated the total percentage of non-UR-designated lands that are within a quarter-mile periphery of them. The idea is that a strong mix of different land use types in an ISA's vicinity is more conducive to change; therefore, the greater the percentage of different GLUPs, the higher the score was.

The proximity test was not weighted as heavily as the others because spatially mixed land uses are not necessarily bad. Thus, the worst possible score for that metric is a "2" and the greatest possible score is a "4". A similar test was not needed for new UM sites since, from a density standpoint, UM is considered compatible with UR/single-family houses.

Corollary to this is a recommended policy for areas that are converted to UH and are larger than 15 acres, which are not as likely to fully develop all at once—and perhaps never fully develop given their size. To overcome this and to integrate them better into their surroundings, staff suggests that for sites larger than 15 acres a ratio of total multi-family acreage to total single-family acreage should be considered as a policy directive. The Housing Element suggests a single-family-to-multifamily ratio of 65:35, so this provides some reasonable guidance. For example, the City could require that areas over 15 acres include a mix of housing densities that aim for an overall single-family-to-multi-family ratio between 55:45 and 70:30.

These tests were not intended to be conclusive, but instead be a guide for the decision makers to weigh in conjunction with all the factors. A high score for an ISA means that there are several factors favorable to the change, but a deeper understanding gained through public testimony revealed further details that diminished support for some of the areas.

Finally, the Housing Element describes a gap in the range of affordable home choices for working families. For those households earning less than Medford's Median Family Income (MFI), there is a deficit of 4,456 homes in the affordable range, and even for households earning up to 140% MFI there is a deficit of 1,322 homes[12]. The variety and supply of home choices can only be increased by increasing the supply of land suitable for those choices. The only GLUP designation that allows the MFR-15 zoning district is "Medium-Density Urban Residential" (UM). The City currently has 66 acres with UM designation, which is about half a percent of the total Residential GLUP acreage in the City (see *Table 5.1*); there is very little market opportunity, therefore, for ownership of the types of homes that would help fill that affordability gap.

Table 5.1. Acreages of each GLUP designation in Medford
Source: Medford Geographic Information Systems (GIS), December 2013

GLUP	designation	Acres	Percent of total Residential
A	Airport	731	–
CC	City Center	165	–
CM	Commercial	1,748	–
GI	General Industrial	1,650	–
HI	Heavy Industrial	1,304	–
PS	Parks/Schools	1,078	–
SC	Svc Commercial	396	–
UH	Residential—high density	919	8.4%
UM	Residential—medium density	66	0.6%
UR	Residential—low density	10,017	91.0%
	total acres	**18,074**	–

Conclusions—Social

The social consequences of the changes are especially complex for PALs that propose to increase residential density. Neighborhoods near such PALs fear that traffic will increase, their property values will depress, and the density and architectural character of higher-density housing types will be incompatible with single-family homes.

It is likely that traffic would be greater than if an area were to develop according to their present densities; on the other hand, traffic will increase citywide within the planning horizon as the population grows. The fewer PALs that are approved, more and longer trips will be the result.

[12] Calculated from Table 25, Housing Element, p. 44.

It is not empirically true in all instances that multi-family development will depress nearby home prices. But because the popular understanding is that this is always the case, staff suggests it would be constructive to develop ways to better ensure that multi-family development is spatial and architecturally compatible with adjacent single-family neighborhoods, such as through design standards.

Additionally, the housing affordability gap is a social equity problem that can be addressed by converting more areas to higher densities. The City has a unique opportunity to expand its amount of "Medium-Density Urban Residential" (UM), the only GLUP designation that allows the MFR-15 zoning district.

Conclusions—overall

On balance the environmental, economic, social, and energy consequences of the changes would be positive. Changing designations and clustering of densities and uses to utilize existing urbanizable land for a proven need is a more efficient urban form than sprawl, which necessitates a wider and more rapid extension of streets and utilities, putting a fiscal burden on the City for their continued maintenance and replacement. There are generally positive social and energy effects from increasing density and mixing uses. The environmental impact is not different from leaving the GLUP designation as it is. The economic effect is positive fiscally for the City and positive for households financially because it increases the supply of land for higher-density housing. The economic impact is positive fiscally for the City because it increases the supply of land for commercial uses, and reduces the number of miles of street and transmission lines that need to be maintained.

Criterion 6. Compatibility of the proposed change with other elements of the City Comprehensive Plan

Findings

Supportive. The following goals, policies, and implementation measures from the various elements of the Comprehensive Plan support the concept of intensifying land uses within the current urban area prior to expanding:

> **Environment**
>
> [Natural Resources]
>
> Air Quality—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.

Soil—Goal 9: To assure that future urban growth in Medford occurs in a compact manner that minimizes the consumption of land, including class I through IV agricultural land.

Energy—Goal 10: To assure that urban land use activities are planned, located, and constructed in a manner that maximizes energy efficiency.

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.

Economy

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.

Policy 1-8: The City shall balance the efficient use of public facilities, the conservation of limited land resources, the maintenance of air and water quality and compatibility with surrounding land uses.

Housing

Policy 2: The City of Medford shall designate areas for residential development that are or will be conveniently located close to pedestrian, bicycle, and transit or high capacity transportation routes, community facilities and services, and employment to ensure that the benefits of public investment in those facilities are available to as many households as possible.

Implementation 2-A: Pursue amendments as needed to achieve transit-supportive density near current and future transit streets, especially where parks or schools are present.

Policy 3: In planning for needed housing, the City of Medford shall strive to provide a compact urban form that allows efficient use of public facilities and protects adjacent resource lands.

Implementation 3-A: Assess policies, regulations, and standards affecting residential development and pursue amendments as needed to meet Policy 3. Consider actions such as: (a) Upzoning buildable land to medium and high density residential;

Transportation

Public Transportation—Implementation measure 3-B-4. Assure that land use planning activities promote transit service viability and accessibility, including locating mixed residential-commercial, multiple-family residential, and employment land uses on or near (within ¼-mile walking distance) transit corridors.

Policy 3-C: The City of Medford shall undertake efforts to increase the percentage of dwelling units in the Medford planning area located within one-quarter mile walking distance of transit routes, consistent with the target benchmarks in the "Alternative Measures" of the 2001-2023 Rogue Valley Regional Transportation Plan (RTP).

[Transportation and land use]

Goal 8: To maximize the efficiency of Medford's transportation system through effective land use planning.

Policy 8-A: The City of Medford shall facilitate development or redevelopment on sites located where best supported by the overall transportation system that reduces motor vehicle dependency by promoting walking, bicycling and transit use. This includes altering land use patterns through changes to type, density, and design.

Implementation Measure 8-A-1. Through revisions to the Medford Comprehensive Plan and Land Development Code, provide opportunities for increasing residential and employment density in locations that support increased use of alternative travel modes, such as along transit corridors.

Policy 8-B: The City of Medford shall undertake efforts to increase the percentage of dwelling units and employment located in Medford's adopted Transit Oriented Districts (TODs), consistent with the targeted benchmarks in the "Alternative Measures" of the 2001-2023 Rogue Valley Regional Transportation Plan (RTP).

Implementation Measure 8-B-1. Through revisions to the Medford Comprehensive Plan and Land Development Code, pursue changes to planned land uses to concentrate employment, commercial, and high density residential land uses in Transit Oriented Districts (TODs).

Regional Plan

Goal 1: Manage future regional growth for the greater public good.

Guiding policies:

c. The Region's overall urban housing density shall be increased to provide for more efficient land utilization.

[…]

Performance indicators (i.e., implementation measures)

5. Committed Residential Density. Land within an urban reserve and land currently within an Urban Growth Boundary (UGB) but outside of the existing City Limit shall be built, at a minimum, to the following residential densities. This requirement can be offset by increasing the residential density in the city limit.

City	Dwelling units per gross acre	
	2010–2035	2036–2060
Central Point	6.9	7.9
Eagle Point	6.5	7.5
Medford	6.6	7.6
Phoenix	6.6	7.6
Talent	6.6	7.6

6. Mixed-Use/Pedestrian-Friendly Areas. For land within an urban reserve and for land currently within a UGB but outside of the existing City Limit, each city shall achieve the 2020 benchmark targets for the number of dwelling units (Alternative Measure no. 5) and employment (Alternative Measure no. 6) in mixed-use/pedestrian-friendly areas as established in the 2009 Regional Transportation Plan (RTP) or most recently adopted RTP. Beyond the year 2020, cities shall continue to achieve the 2020 benchmark targets, or if additional benchmark years are established, cities shall achieve the targets corresponding with the applicable benchmarks. Measurement and definition of qualified development shall be in accordance with adopted RTP methodology. The requirement is considered met if the city or the region overall is achieving the targets or minimum qualifications, whichever is greater. This requirement can be offset by increasing the percentage of dwelling units and/or employment in the City Limit. This requirement is applicable to all participating cities.

Neutral. The following goals, policies, and implementation measures neither support nor oppose the PALs, but require a response:

> **Economy, Policy 1-3**: The City of Medford shall, as appropriate under the Goal above, support the retention and expansion of existing businesses.
>
> […]
>
> Implementation measure 1-3-b. When evaluating GLUP Map amendments, assess the potential impacts of those amendments on neighboring land uses.

General but not relevant. Several goals, policies, and implementation measures appear to implicate the PALs. A few examples follow:

> **Public Facilities**
>
> Policy 1-A: The City of Medford shall provide, where feasible and as sufficient funds are available from public or private sources, the following facilities and services at levels appropriate for all land use types within the City:
>
> Water Service, Goal 1: To provide the City of Medford with high quality domestic water for consumption and fire protection, consistent with state, federal and industry standards.
>
> Sanitary Sewage Collection, Goal 1: To provide appropriate sanitary sewage collection facilities to serve the Medford Urban Growth Boundary.
>
> Sanitary Sewage Treatment, Goal 1: To provide appropriate sanitary sewage treatment facilities to serve the Medford Urban Growth Boundary.
>
> **Transportation**
>
> Goal 1: To provide a multi-modal transportation system for the Medford planning area that supports the safe, efficient, and accessible movement of all people and goods, and recognizes the area's role as the financial, medical, tourism, and business hub of Southern Oregon and Northern California.

Conclusions

Numerous goals, policies, and implementation measures in the Comprehensive Plan point toward some variation on compact development: "pedestrian-oriented, mixed-use development;" "activity centers;" "growth…in a compact manner;" "incorporating compact and urban centered growth concepts."

Another pervasive theme among the goals and policies is efficiency: "maximiz[ing] energy efficiency;" utilization of "existing capital infrastructure;" the "efficient use of public facilities;" ensuring "that the benefits of public investment in those facilities

are available to as many households as possible;" the "efficient use of public facilities."

In several cases there is explicit direction to change land use designations: "altering land use patterns through changes to type, density, and design;" "[r]educe projected deficits in employment lands by changing GLUP Map designations;" "increasing the residential density in the city limit;" "[p]ursue amendments as needed to achieve transit-supportive density near current and future transit streets;" "Upzoning buildable land to medium and high density residential;" "Through revisions to the Medford Comprehensive Plan…provide opportunities for increasing residential and employment density… pursue changes to planned land uses to concentrate employment, commercial, and high density residential land uses."

Implementation measure 1-3-b from the Economic Element requires an analysis of the "potential impacts" of map changes on neighboring uses. The findings and conclusions under criterion 5, the "environmental, energy, economic and social consequences" of a given map amendment, serve as responses to this measure.

The few examples provided of goals, policies, and implementation measures that appear to implicate the PAL project are actually general in scope and intent; or are goals, policies, and measures related to growth of any stripe, and therefore are valid with or without the PAL project. To illustrate: the goal to provide "high quality domestic water for consumption and fire protection" is not contingent on whether the urban area amendment is accomplished through boundary expansion, intensification of the existing urban area, or a combination of both. The same conclusion is made for any goals, policies, and implementation measures of a similar nature.

Criterion 7. All applicable Statewide Planning Goals

The following demonstrate conformity with the applicable Statewide Planning Goals.

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, including participation in the quasi-judicial revision of the Comprehensive Plan. 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. Affect-

ed 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 two open houses (16 and 17 May 2011) to receive comments from property owners and neighbors. In addition to the property owners, staff went beyond the normal requirement, and sent hearing notification to neighbors within 200 feet of the internal study areas. Staff prepared press releases and provided information on the City's website. Finally, this proposal was considered by the Planning Commission and the City Council during televised public hearings.

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.

Conclusions

There is an adequate factual basis for the proposed designation changes.

Goal 3—Agricultural Lands does not apply in this case.
Goal 4—Forest Lands does not apply in this case.

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

Findings

The areas under consideration have been in the urban area for decades. A few PALs have wetlands and floodplains. No PAL contains designated open space.

Conclusions

Some PALs contain wetlands and floodplains, but those areas are considered presently suited for development; a designation change does not change that fact. None of the PALs threaten natural, historic, or open space resources.

Goal 6—Air, Water, and Land Resources Quality

Findings

All types of uses—industrial, commercial, and residential—have waste and process discharges, either primarily, such as from smoke stacks or sewage, or secondarily, through the generation of motor vehicle trips. Converting surplus vacant or redevelopable industrial areas to commercial puts those needed areas closer to existing housing, reducing the distances workers and shoppers have to travel (see Environmental Element, p. 11). However, it is also true, as a review of ITE's *Trip Generation* would show, that commercial uses generate more trips per square foot than industrial uses, so more trips would be made to and from the areas that are changed. Converting low-density residential to higher densities will also put more of the housing need closer to existing jobs, goods, and services.

Conclusions

The change from industrial to commercial designation will have a negligible effect on the production of pollutants and may, in fact, be positive. Though commercial land is a greater trip generator, putting needed areas inside the existing urban area in place of surplus areas will result in shorter trip lengths overall, thus reducing pollutants, except in cases where the commercial use is a regional attractor. Using land within the current urban area will positively affect air, water, and land resources quality.

Goal 7—Areas Subject to Natural Hazards

Findings

Slopes: Many areas with steep slopes were eliminated in the first round of ISA selection because they could not yield utile increases in density.

Flood: The following PALs are traversed by flood plains: 510, 540, and 718. Ten percent (30 out of 308) of the PAL lots intersect the so-called 100-year flood plain of various streams. Internal study areas 510 (Bear Creek), 540 (Crooked Creek), and 718 (unknown flood source) contain large proportions of flood plain.

Table 7.1. Areas of PALs affected by 100-year flood plain

PAL no.	Area in flood plain (ac)	Area of ISA in lots (ac)	Percent affected
510	26	52	51%
540	19	53	36%
718	3	11	23%
total	**48**	**116**	**42%**

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

The PALs are in areas that have long been considered suitable for eventual development, so the question here is whether it is appropriate to increase developable capacity in flood-prone areas. There is a presumption in flood damage prevention regulations that the risk to life and property is acceptably low when the regulations are followed. In the absence of requirements to cluster buildings outside of flood plains or a policy of purchasing land or development rights in flood plains, the City accepts that buildings will be sited within them. Regulations are and will continue to be in effect that will assure protection from natural hazards.

Goal 8—Recreation Needs

Findings

The City of Medford "Leisure Services Plan" incorporates the future population of Medford and includes strategies and plans for providing adequate recreation facilities for the present and future population. The PALs do not represent a greater population increase than what is projected.

Conclusions

The PALs are consistent with the strategies and plans in the "Leisure Services Plan" because both anticipate the same future population.

Goal 9—Economic Development

Findings

The first section of this Goal requires Comprehensive Plans to "3. Provide for at least an adequate supply of sites of suitable sizes, types, locations, and service levels for a variety of industrial and commercial uses consistent with plan policies." The Industrial-to-Commercial PALs are intended to help address the need for commercial land as identified in the Economic Element (2008).

Conclusions

The changes will provide commercial land in the existing urban area.

Goal 10—Housing

Findings

The goal 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." The Housing Element concludes that it has "added and balanced allocations for the Urban Medium-Density Residential [UM] plan designation" (conclusion 13, p. 77), but no increase in the amount of UM land was overtly identified in the goals, policies, and implementation strategies section. However, Implementation strategy 1-C-e requires the assessment of such factors as "assuring a mix of income levels and dwelling types…throughout the City" in the effort to meet Policy 1, which requires the assessment and determination of development priorities and specific strategies to address housing needs as identified in the Housing Element (2010).

Conclusions

A quarter of the nearly 500 gross PAL acres are a change from low-density residential to medium density (UR to UM), both because it is an underrepresented type and because it is more compatible with existing low densities. The residential aspect of the ISA project clearly fulfills the requirements of this Goal by providing the types of residential land determined to be necessary to meet the City's 20-year projected housing need.

Goal 11—Public Facilities and Services

Findings

Refer to findings under Criterion 3, above.

Conclusions

Refer to conclusions under Criterion 3, above.

Goal 12—Transportation

Findings

The "Transportation Planning Rule" (OAR 660-012) requires cities to have plans to accommodate anticipated transportation system needs. Staff secured a consultant to analyze the impacts from the internal study areas to tell us our future transportation needs.

As Public Works pointed out in its memo dated 12/12/2013 (see Exhibit D of 1/15/2014 staff report), the analysis found that 36 of 79 analyzed intersections in the City would fall below Level of Service (LOS) D by 2028, the projected build-out year of the ISAs. On the question of changing LOS or increased transportation sys-

tem development charges, City Council was open to the idea of changing LOS, but requested options from the consultant.

The problem with the analysis was that it projected a full build out of all ISAs, requiring the use of 2028 population and employment figures; naturally, it showed a lot of failures. That is exactly what we would expect five years beyond the horizon of the City's Transportation System Plan regardless of ISAs (or PALs). In that respect the analysis was not designed to differentiate among the individual lots or ISAs themselves, only to provide a picture of a full-build-out year so as to better inform the discussion on LOS, concurrency, and systems development charges.

By the time Council considers the PALs (perhaps several months after the Planning Commission hearings), staff from Public Works and Planning will have obtained a policy direction from Council on level of service.

Conclusions

Normally, when a GLUP change seeks to increase activity, staff would provide a list of needed transportation improvements and costs, along with an explanation of how these will be financed. In this case there are several variables that cannot be pinned down yet and so make it impossible to provide any such information. The pending issues are:

- How many/which PALs will be approved by Council?
- How much land and where will be included in the urban growth boundary expansion?
- What changes will be made to the level-of-service standard?

Ultimately, after the PALs have been assessed and the UGB amended, the Transportation System Plan will be updated for the future urban area. Whichever PALs may seek to develop in the meantime will still have to perform traffic analyses in order to obtain zoning and will face the City's concurrency requirement to have necessary offsite improvements in places at the time of development.

Goal 13—Energy Conservation

Findings

Among this goal's guidelines is this: "The allocation of land and uses permitted on the land should seek to minimize the depletion of non-renewable sources of energy." There is a need for commercial land and a surplus of industrial land. The purpose of the ISAs is to accommodate some of the land need in the existing urban area.

Conclusions

Maintaining shorter distances between interdependent uses (e.g., homes and shopping) results in a cumulative saving of energy from travel and infrastructure maintenance. The proposed changes comply with the directives in Goal 13.

Goal 14—Urbanization

Findings

The second directive under the "Land Need" section of the goal states "Prior to expanding an urban growth boundary, local governments shall demonstrate that needs cannot reasonably be accommodated on land already inside the urban growth boundary."

Conclusions

Staff and the Planning Commission identified and analyzed the ISAs specifically to determine if they could accommodate some of the need. The proposed changes comply with the directives in this Goal.

Goals 15–19 do not apply to Medford.

OVERALL CONCLUSIONS

The basic premises of the Housing and Economic Elements goals are that the City will provide land to accommodate its future residential and employment needs. There are a large number of City Council goals, policies, and implementation measures that support intensification and that spring from a single simple concept of urban growth: the efficient use of land resources. The underlying rationale for this affirms that utilizing existing infrastructure is a better choice in terms of long-term maintenance costs for the City.

EXHIBITS

A. PAL capacity analysis

EXHIBIT A. DEVELOPMENT CAPACITY ANALYSIS

The Planning Commission pared down the internal study areas (ISAs) into a set of proposed amendment locations (PALs). In addition, they added a few locations that had been requested for inclusion in this process. The PALs cover about 540 acres throughout the City, which is only three percent of the whole urban area. Since every lot has factors that affect how much development can actually be realized, a lot-by-lot capacity analysis was performed to determine how much development potential existed in those 540 acres.

The PAL Capacity Analysis (Exhibit A) details the assumptions made in order to calculate development capacity, which were based on the assumptions in the Housing and Economic Elements. The results are summarized in *Table I.2*, along with a comparison to the land need for the targeted General Land Use Plan categories.

Table A.1. PAL Capacity and Relation to Need

Proposed GLUP		**PAL capacity** *in acres*	**Land need** *in acres*	**Amt. over or (under) need**
CM	commercial	189	316	(127)
UH	high-density res.	77	93	(16)
UM	medium-density res.	75	75	0
		341		

The effect on the City's land need will be determined for the second phase of the UGB Amendment project, the expansion of the urban area.

After putting its recommendations together into the set of PALs, staff performed a development capacity analysis on the lots in the proposed areas to determine how much of the City's 20-year land need could be satisfied by the proposed changes. The categories of buildable land and the assumptions used to determine capacity are in the table below.

Classification	**Capacity Assumptions**
Developed	The lot area was zeroed out, unless larger than 0.5 acres, in which case an estimate of capacity was made using aerial photos
Partially Developed Residential (PDR)	As described in the Buildable Lands Inventory, a quarter acre was removed from each lot with this designation
Redevelopable	Using the guidelines from Table 28 of the Housing Element, the redevelopable lots were reduced by their probability that they would redevelop in the planning period. The relevant features from the table are: Lot size — Probability of redevelopment 0.1–0.99 — 29% 1.00–1.99 — 34% 2.00–2.99 — 52% 3.00 and greater — 83% Staff stretched this assumption to the commercial lots
Vacant	No adjustments were made. The entire lot is considered developable.

The lot-by-lot capacity calculation follows. Out of 540 gross acres in PALs, the total capacity is calculated to be 341 acres (see *Table I.2* on page 3). The "Land Need" in the table are the gross acres needed for each of the identified GLUP designations according to the *Economic Element* (for CM) and the *Housing Element* (for UH and UM).

Exhibit A – PAL Capacity Analysis

as recommended by the Planning Commission and staff

UGBA Phase 1: ISA GLUP Amendment (file no. CPA-13-032) **April 24, 2014**

Staff Report

Map/lot no.	Site Address	Acreage	GLUP existing	GLUP proposed	BLI	Adjusted Acreage	notes	PAL	sums per PAL
371W06200	1322 E VILAS RD	32.0	HI	CM	RED	26.6		140a-cm	77.6
371W062600	4545 CRATER LAKE HWY	20.6	HI	CM	VAC	20.6		140a-cm	
371W062607	CRATER LAKE HWY	30.5	HI	CM	VAC	30.5		140a-cm	
371W062613	CRATER LAKE HWY	0.9	HI	CM	developed	0.0		140a-cm	
371W08BA3500	3901 SPRINGBROOK RD	0.8	UR	UM	developed	0.4		212a-um	5.2
371W08BA3600	3913 SPRINGBROOK RD	0.8	UR	UM	developed	0.4		212a-um	
371W08BA3700	3935 SPRINGBROOK RD	0.8	UR	UM	developed	0.4		212a-um	
371W08BA3800	1850 COKER BUTTE RD	0.9	UR	UM	developed	0.5		212a-um	
371W08BA3900	1834 COKER BUTTE RD	0.9	UR	UM	developed	0.5		212a-um	
371W08BA4001	1804 COKER BUTTE RD	1.0	UR	UM	developed	0.5		212a-um	
371W08BA4100	1800 COKER BUTTE RD	1.2	UR	UM	PDR	1.0		212a-um	
371W08BA4200	1772 COKER BUTTE RD	1.8	UR	UM	PDR	1.5		212a-um	
371W08BA600	3868 SPRINGBROOK RD	4.8	UR	UH	PDR	4.5		212b-uh	4.5
371W08BD500	HONDELEAU LN	19.7	UR	UH	VAC	2.6	subset of the lot	213a-uh	2.6
371W08BD501	HONDELEAU LN	20.7	UR	UH	VAC	4.1	subset of the lot	213b-uh	4.1
371W08BC1800	3724 CRATER LAKE HWY	2.3	GI	CM	RED	1.2		214a-cm	6.3
371W08BC1801	CRATER LAKE HWY	2.0	GI	CM	developed	1.7		214a-cm	
371W08BC1900	3650 CRATER LAKE AVE	4.2	GI	CM	developed	3.5		214a-cm	
371W08C101	CRATER LAKE HWY	0.5	GI	UR	RED	0.1		215a-ur	0.1
371W08C202	CRATER LAKE HWY	0.6	GI	UR	developed	0.0		215a-ur	
371W08BC2802	CRATER LAKE AVE	0.8	GI	CM	unbuildable	0.0		215b-cm	22.3
371W08BC2804	CRATER LAKE AVE	0.8	GI	CM	RED	0.2		215b-cm	
371W08C200	3384 HWY 62	8.3	GI	CM	RED	6.9		215b-cm	

Exhibit A – PAL Capacity Analysis

as recommended by the Planning Commission and staff

Map/lot no.	Site Address	Acreage	GLUP existing	GLUP proposed	BLI	Adjusted Acreage	notes	PAL	sums per PAL
371W08C201		0.3	GI	CM	developed	0.0		215b-cm	
371W08C300	3450 CRATER LAKE HWY	3.0	GI	CM	developed	2.5		215b-cm	
371W08C301	CRATER LAKE HWY	1.5	GI	CM	RED	0.5		215b-cm	
371W08C400	3366 CRATER LAKE HWY	2.0	GI	CM	developed	1.7		215b-cm	
371W08C401	CRATER LAKE HWY	0.1	GI	CM	RED	0.0		215b-cm	
371W08C500	3364 CRATER LAKE AVE	0.9	GI	CM	developed	0.9		215b-cm	
371W08C600	3300 CRATER LAKE AVE	6.9	GI	CM	RED	5.8		215b-cm	
371W08C700	3250 CRATER LAKE AVE	4.5	GI	CM	RED	3.8		215b-cm	
371W08C100	3414 CRATER LAKE AVE	4.5	GI	UH	RED	3.8		215c-uh	3.8
371W08C600	3300 CRATER LAKE AVE	0.0	GI	UH	developed	0.0		215c-uh	
371W08C800	CRATER LAKE AVE	0.1	GI	UH	developed	0.0		215c-uh	
371W051100	4100 CRATER LAKE AVE	2.0	GI	CM	developed	1.6		216a-cm	4.2
371W051200	4048 CRATER LAKE AVE	3.1	GI	CM	developed	2.6		216a-cm	
371W051300	4021 CRATER LAKE AVE	2.7	GI	CM	developed	0.0		216a-cm	
371W051400	1597 COKER BUTTE RD	0.1	GI	CM	developed	0.0		216a-cm	
371W17CB4500	2200 ROBERTS RD	6.3	UR	UM	developed	3.1		250a-um	3.1
371W32B3600	1365 CENTER DR	3.6	UR	CM	developed	3.0		510a-cm	27.1
371W32B3604	1405 CENTER DR	15.7	UR	CM	developed	13.0		510a-cm	
371W32B3605	BELKNAP RD	0.1	UR	CM	developed	0.0		510a-cm	
371W32B4708	CENTER DR	0.0	UR	CM	unbuildable	0.0		510a-cm	
371W32B4802	BELKNAP RD	0.1	UR	CM	developed	0.0		510a-cm	
371W32C200	SOUTH PACIFIC HWY	11.1	UR	CM	VAC	11.1		510a-cm	
371W32C100	SOUTH PACIFIC HWY	6.2	UR	UH	VAC	6.2		510b-uh	7.1

Map/lot no.	Site Address	Acreage	GLUP existing	GLUP proposed	BLI	Adjusted Acreage	notes	PAL	sums per PAL
371W32C1300	255 CHARLOTTE ANN RD	0.4	UR	UH	developed	0.0		510b-uh	
371W32C1400	275 CHARLOTTE ANN RD	0.4	UR	UH	developed	0.0		510b-uh	
371W32C1500	315 CHARLOTTE ANN RD	0.4	UR	UH	developed	0.0		510b-uh	
371W32C1501	319 CHARLOTTE ANN RD	0.4	UR	UH	developed	0.0		510b-uh	
371W32C1600	321 CHARLOTTE ANN RD	0.4	UR	UH	developed	0.0		510b-uh	
371W32C1700	365 CHARLOTTE ANN RD	0.4	UR	UH	developed	0.0		510b-uh	
371W32C1800	CHARLOTTE ANN RD	0.8	UR	UH	RED	0.2		510b-uh	
371W32C1900	435 CHARLOTTE ANN RD	0.4	UR	UH	developed	0.0		510b-uh	
371W32C2000	445 CHARLOTTE ANN RD	0.4	UR	UH	developed	0.0		510b-uh	
371W32C2100	465 CHARLOTTE ANN RD	0.8	UR	UH	RED	0.2		510b-uh	
371W32C2200	505 CHARLOTTE ANN RD	0.4	UR	UH	developed	0.0		510b-uh	
371W32C2201	535 CHARLOTTE ANN RD	0.4	UR	UH	developed	0.0		510b-uh	
371W32C2300	545 CHARLOTTE ANN RD	0.4	UR	UH	developed	0.0		510b-uh	
371W32C2301	555 CHARLOTTE ANN RD	0.3	UR	UH	developed	0.0		510b-uh	
371W32C2401	CHARLOTTE ANN RD	0.7	UR	UH	unbuildable	0.0		510b-uh	
371W32C2700	CHARLOTTE ANN RD	0.8	UR	UH	unbuildable	0.0		510b-uh	
371W32C2800	560 CHARLOTTE ANN RD	0.3	UR	UH	developed	0.0		510b-uh	
371W32C2900	558 CHARLOTTE ANN RD	0.3	UR	UH	developed	0.0		510b-uh	
371W32C3000	542 CHARLOTTE ANN RD	0.3	UR	UH	developed	0.0		510b-uh	
371W32C3100	524 CHARLOTTE ANN RD	0.5	UR	UH	developed	0.0		510b-uh	
371W32C3201	466 CHARLOTTE ANN RD	0.3	UR	UH	developed	0.0		510b-uh	
371W32C3202	480 CHARLOTTE ANN RD	0.4	UR	UH	developed	0.0		510b-uh	
371W32C3300	450 CHARLOTTE ANN RD	0.9	UR	UH	developed	0.0		510b-uh	

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371W32C3400	430 CHARLOTTE ANN RD	0.4	UR	UH	developed	0.0		510b-uh	
371W32C3500	410 CHARLOTTE ANN RD	0.5	UR	UH	developed	0.0		510b-uh	
371W32C3600	380 CHARLOTTE ANN RD	0.4	UR	UH	developed	0.0		510b-uh	
371W32C3700	358 CHARLOTTE ANN RD	0.4	UR	UH	developed	0.0		510b-uh	
371W32C3800	340 CHARLOTTE ANN RD	0.4	UR	UH	developed	0.0		510b-uh	
371W32C3900	320 CHARLOTTE ANN RD	0.4	UR	UH	developed	0.0		510b-uh	
371W32C4000	310 CHARLOTTE ANN RD	0.4	UR	UH	VAC	0.4		510b-uh	
371W32C4001	310 CHARLOTTE ANN RD	0.4	UR	UH	developed	0.0		510b-uh	
371W32C4100	240 CHARLOTTE ANN RD	0.5	UR	UH	developed	0.0		510b-uh	
371W31A3400	1100 S HOLLY ST	0.1	UR	CM	developed	0.0	added	540a-cm	0.2
371W31A3500	1118 S HOLLY ST	0.4	UR	CM	developed	0.1	added	540a-cm	
371W31A3600	1200 S HOLLY ST	0.2	UR	CM	developed	0.1	added	540a-cm	
371W31A3601	1180 S HOLLY ST	0.1	UR	CM	developed	0.0	added	540a-cm	
371W31A3800	1415 S HOLLY ST	12.1	UR	UM	RED	10.1		540b-um	21.1
371W31D401	MYERS LN	13.0	UR	UM	RED	10.8		540b-um	
371W31D500	MYERS LN	0.8	UR	UM	RED	0.2		540b-um	
371W31D400	1390 MYERS LN	23.3	UR	UH	RED	19.4		540c-uh	19.7
371W31D800	MYERS LN	1.0	UR	UH	RED	0.3		540c-uh	
371W31C300	200 GARFIELD ST	1.8	UR	UM	PDR	1.5	added	540d-um	1.5
372W35DA1300	1634 ORCHARD HOME DR	2.3	UR	UH	RED	0.6	west half	630a-uh	3.9
372W35DA1400	ORCHARD HOME DR	0.4	UR	UH	PDR	0.1	west half	630a-uh	
372W35DA1500	1652 ORCHARD HOME DR	2.3	UR	UH	PDR	1.0	west half	630a-uh	
372W35DB2501	THOMAS RD	3.3	UR	UH	PDR	0.8	subset of the lot	630a-uh	

Exhibit A – PAL Capacity Analysis

as recommended by the Planning Commission and staff

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372W35DB801	THOMAS RD	2.7	UR	UH	PDR	1.4	subset of the lot	630a-uh	
372W35DB2501	THOMAS RD	3.3	UR	UM	PDR	1.1	subset of the lot	630b-um	16.5
372W35DC1900	2020 SUNSET DR	1.9	UR	UM	PDR	1.6		630b-um	
372W35DC2000	2010 SUNSET DR	0.9	UR	UM	RED	0.3		630b-um	
372W35DC400	1727 THOMAS RD	1.8	UR	UM	PDR	0.9	subset of the lot	630b-um	
372W35DC500	2087 WESTWOOD DR	0.5	UR	UM	developed	0.0		630b-um	
372W35DC700	1783 THOMAS RD	2.9	UR	UM	RED	1.4	subset of the lot	630b-um	
372W35DD100	1654 ORCHARD HOME DR	0.3	UR	UM	developed	0.0		630b-um	
372W35DD1000	1756 ORCHARD HOME DR	0.6	UR	UM	developed	0.0		630b-um	
372W35DD1200	1800 ORCHARD HOME DR	1.1	UR	UM	PDR	0.8		630b-um	
372W35DD1300	1800 ORCHARD HOME DR	0.6	UR	UM	RED	0.6		630b-um	
372W35DD1400	1802 ORCHARD HOME DR	0.5	UR	UM	developed	0.0		630b-um	
372W35DD200	1678 ORCHARD HOME DR	0.2	UR	UM	developed	0.0		630b-um	
372W35DD201	ORCHARD HOME DR	0.2	UR	UM	developed	0.0		630b-um	
372W35DD202	ORCHARD HOME DR	1.1	UR	UM	VAC	1.1		630b-um	
372W35DD2100	SUNSET DR	0.6	UR	UM	VAC	0.6		630b-um	
372W35DD2200	1920 SUNSET DR	1.0	UR	UM	RED	0.3		630b-um	
372W35DD2300	1938 SUNSET DR	0.9	UR	UM	developed	0.0		630b-um	
372W35DD2400	1946 SUNSET DR	1.5	UR	UM	PDR	1.2		630b-um	
372W35DD2500	1950 SUNSET DR	0.2	UR	UM	developed	0.0		630b-um	
372W35DD2600	1966 SUNSET DR	0.0	UR	UM	developed	0.0		630b-um	
372W35DD2700	1966 SUNSET DR	0.0	UR	UM	developed	0.0		630b-um	
372W35DD2800	1966 SUNSET DR	0.1	UR	UM	developed	0.0		630b-um	

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372W35DD2900	1970 SUNSET DR	1.3	UR	UM	PDR	1.0		630b-um	
372W35DD300	1980 WESTWOOD DR	2.0	UR	UM	RED	1.0		630b-um	
372W35DD3000	1980 SUNSET DR	2.0	UR	UM	RED	1.0		630b-um	
372W35DD400	2068 WESTWOOD DR	2.4	UR	UM	RED	1.3		630b-um	
372W35DD500	2073 WESTWOOD DR	1.0	UR	UM	RED	0.3		630b-um	
372W35DD600	2021 WESTWOOD DR	1.3	UR	UM	PDR	1.0		630b-um	
372W35DD700	1987 WESTWOOD DR	1.1	UR	UM	RED	0.4		630b-um	
372W35DD800	1957 WESTWOOD DR	1.0	UR	UM	RED	0.3		630b-um	
372W35DD900	1935 WESTWOOD DR	0.8	UR	UM	developed	0.0		630b-um	
372W35DA1300	1634 ORCHARD HOME DR	2.3	UR	CM	RED	0.6	east half	630c-cm	1.7
372W35DA1400	ORCHARD HOME DR	0.4	UR	CM	PDR	0.1	east half	630c-cm	
372W35DA1500	1652 ORCHARD HOME DR	2.3	UR	CM	PDR	1.0	east half	630c-cm	
372W26DD2600	800 CHERRY ST	1.0	UR	UM	developed	0.0		640a-um	7.7
372W26DD2700	820 CHERRY ST	1.0	UR	UM	developed	0.5		640a-um	
372W26DD2800	840 CHERRY ST	0.5	UR	UM	developed	0.2		640a-um	
372W26DD2900	790 CHERRY ST	2.5	UR	UM	PDR	2.2		640a-um	
372W35AA100	908 CHERRY ST	5.1	UR	UM	PDR	4.8		640a-um	
372W26DD2500	788 CHERRY ST	5.0	UR	UM	PDR	4.8		640b-uh	
372W35AA1400	1928 STEWART AVE	0.9	UR	UH	developed	0.5		640b-uh	
372W35AA1500	STEWART AVE	0.9	UR	UH	RED	0.3		640b-uh	
372W35AA1700	STEWART AVE	0.6	UR	UH	VAC	0.6		640b-uh	
372W35AA1800	1944 STEWART AVE	1.0	UR	UH	PDR	0.7		640b-uh	
372W35AA1900	1946 STEWART AVE	1.9	UR	UH	PDR	1.7		640b-uh	14.7

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Map/lot no.	Site Address	Acreage	GLUP existing	GLUP proposed	BLI	Adjusted Acreage	notes	PAL	sums per PAL
372W35AA2400	1001 LOZIER LN	1.0	UR	UH	developed	0.5		640b-uh	
372W35AA2500	961 LOZIER LN	1.0	UR	UH	RED	0.3		640b-uh	
372W35AA2600	945 LOZIER LN	0.9	UR	UH	developed	0.4		640b-uh	
372W35AA2700	915 LOZIER LN	0.1	UR	UH	developed	0.0		640b-uh	
372W35AA2800	903 LOZIER LN	1.1	UR	UH	PDR	0.9		640b-uh	
372W35AA2900	825 LOZIER LN	1.0	UR	UH	developed	0.5		640b-uh	
372W35AA300	970 CHERRY ST	1.2	UR	UH	RED	0.4		640b-uh	
372W35AA400	978 CHERRY ST	1.5	UR	UH	RED	0.5		640b-uh	
372W35AA500	CHERRY ST	1.8	UR	UH	VAC	1.8		640b-uh	
372W35AA600	CHERRY ST	0.3	UR	UH	VAC	0.3		640b-uh	
372W35AA700	986 CHERRY ST	0.2	UR	UH	developed	0.0		640b-uh	
372W35AA800	CHERRY ST	5.0	UR	UH	RED	4.2		640b-uh	
372W35AD3000	1938 STEWART AVE	0.4	UR	UH	developed	0.0		640b-uh	
372W35AA2000	2110 STEWART AVE	0.8	UR	CM	developed	0.2		640c-cm	3.0
372W35AA2100	2140 STEWART AVE	1.9	UR	CM	PDR	1.7		640c-cm	
372W35AA2200	1145 LOZIER LN	1.4	UR	CM	PDR	1.1		640c-cm	
372W35AA2300	1045 LOZIER LN	0.4	UR	CM	developed	0.0		640c-cm	
372W35AB2500	1134 LOZIER LN	0.6	UR	UH	RED	0.2		670b-uh	6.0
372W35AB2600	2370 STEWART AVE	1.4	UR	UH	PDR	1.2		670b-uh	
372W35AC100	2355 STEWART AVE	0.7	UR	UH	developed	0.6		670b-uh	
372W35AC200	2335 STEWART AVE	2.9	UR	UH	VAC	2.9		670b-uh	
372W35AD1900	2325 STEWART AVE	1.3	UR	UH	PDR	1.1		670b-uh	
372W35AB2100	1012 LOZIER LN	2.2	UR	UM	RED	1.1		670a-um	1.1

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Map/lot no.	Site Address	Acreage	GLUP existing	GLUP proposed	BLI	Adjusted Acreage	notes	PAL	sums per PAL
372W26AC1200	217 N ROSS LN	6.4	UR	UH	RED	5.3		718a-uh	5.3
372W26AC2200	161 N ROSS LN	2.6	UR	CM	PDR	2.3		718b-cm	4.6
372W26AC2900	161 N ROSS LN	1.8	UR	CM	VAC	1.8		718b-cm	
372W26AD4400	203 N ROSS LN	0.5	UR	CM	VAC	0.5		718b-cm	
372W24DA13400	302 BOARDMAN ST	0.2	UR	UM	developed	0.0		730a-um	0.0
372W24DA13500	305 EDWARDS ST	0.1	UR	UM	developed	0.0		730a-um	
372W24DA13600	327 EDWARDS ST	0.1	UR	UM	developed	0.0		730a-um	
372W24DA13700	309 BEATTY ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA13800	301 BEATTY ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA14600	304 BEATTY ST	0.6	UR	UM	developed	0.0		730a-um	
372W24DA14700	417 EDWARDS ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA1500	502 ALICE ST	0.1	UR	UM	developed	0.0		730a-um	
372W24DA15400	503 EDWARDS ST	0.1	UR	UM	developed	0.0		730a-um	
372W24DA15500	505 EDWARDS ST	0.1	UR	UM	developed	0.0		730a-um	
372W24DA15600	517 EDWARDS ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA15700	521 EDWARDS ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA1600	505 ALICE ST	0.1	UR	UM	developed	0.0		730a-um	
372W24DA1700	501 ALICE ST	0.1	UR	UM	developed	0.0		730a-um	
372W24DA1800	1006 NIANTIC ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA1900	1010 NIANTIC ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA2000	1014 NIANTIC ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA2100	1018 NIANTIC ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA2200	515 LIBERTY ST	0.1	UR	UM	developed	0.0		730a-um	

Map/lot no.	Site Address	Acreage	GLUP existing	GLUP proposed	BLI	Adjusted Acreage	notes	PAL	sums per PAL
372W24DA2300	513 LIBERTY ST	0.1	UR	UM	developed	0.0		730a-um	
372W24DA2400	1106 NIANTIC ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA2500	1112 NIANTIC ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA2600	1116 NIANTIC ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA2700	1120 NIANTIC ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA2800	1126 NIANTIC ST	0.1	UR	UM	developed	0.0		730a-um	
372W24DA2900	1130 NIANTIC ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA3000	1129 NIANTIC ST	0.4	UR	UM	developed	0.0		730a-um	
372W24DA3100	1119 NIANTIC ST	0.3	UR	UM	developed	0.0		730a-um	
372W24DA3200	1111 NIANTIC ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA3300	1107 NIANTIC ST B	0.2	UR	UM	developed	0.0		730a-um	
372W24DA3400	1103 NIANTIC ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA3500	1021 NIANTIC ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA3600	1015 NIANTIC ST	0.1	UR	UM	developed	0.0		730a-um	
372W24DA3700	1007 NIANTIC ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA3900	1001 NIANTIC ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA4000	416 ALICE ST	0.1	UR	UM	developed	0.0		730a-um	
372W24DA4100	ALICE ST	0.1	UR	UM	developed	0.0		730a-um	
372W24DA4200	408 ALICE ST	0.1	UR	UM	developed	0.0		730a-um	
372W24DA4300	318 BEATTY ST	0.1	UR	UM	developed	0.0		730a-um	
372W24DA4400	406 BEATTY ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA4500	408 BEATTY ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA4600	410 BEATTY ST	0.2	UR	UM	developed	0.0		730a-um	

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Map/lot no.	Site Address	Acreage	GLUP existing	GLUP proposed	BLI	Adjusted Acreage	notes	PAL	sums per PAL
372W24DA4700	422 BEATTY ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA4800	404 LIBERTY ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA4900	502 BEATTY ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA5000	506 BEATTY ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA5100	510 BEATTY ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA5200	514 BEATTY ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA5300	518 BEATTY ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA5400	524 BEATTY ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA5600	528 BEATTY ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA5700	527 BEATTY ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA5800	519 BEATTY ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA5900	517 BEATTY ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA6000	513 BEATTY ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA6100	509 BEATTY ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA6200	505 BEATTY ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA6300	503 BEATTY ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA6400	423 BEATTY ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA6500	415 BEATTY ST	0.1	UR	UM	developed	0.0		730a-um	
372W24DA6600	411 BEATTY ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA6700	407 BEATTY ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA6800	381 ALICE ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA6900	398 ALICE ST	0.1	UR	UM	developed	0.0		730a-um	
372W24DA7000	366 ALICE ST	0.1	UR	UM	developed	0.0		730a-um	

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Map/lot no.	Site Address	Acreage	GLUP existing	GLUP proposed	BLI	Adjusted Acreage	notes	PAL	sums per PAL
372W24DA7100	334 ALICE ST	0.1	UR	UM	developed	0.0		730a-um	
372W24DA7200	302 ALICE ST	0.1	UR	UM	developed	0.0		730a-um	
372W24DA7400	304 BOARDMAN ST	0.1	UR	UM	developed	0.0		730a-um	
372W24DA7500	402 BOARDMAN ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA7600	408 BOARDMAN ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA7700	410 BOARDMAN ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA7800	416 BOARDMAN ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA7900	420 BOARDMAN ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA8000	305 LIBERTY ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA8100	508 BOARDMAN ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA8200	512 BOARDMAN ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA8300	516 BOARDMAN ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA8400	520 BOARDMAN ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA8500	524 BOARDMAN ST	0.2	UR	UM	developed	0.0		730a-um	
372W24DA8600	528 BOARDMAN ST	0.2	UR	UM	developed	0.0		730a-um	
372W25AA5700	132 W FOURTH ST	1.2	UH	CM	RED	0.4	correction area	740a-cm	0.4
372W25AA5701	132 W FOURTH ST	0.3	UH	CM	developed	0.0	correction area	740a-cm	
371W30CD7700	950 S CENTRAL AVE	0.2	HI	CM	developed	0.0	correction area	750a-cm	0.0
371W30CD7800	936 S CENTRAL AVE	0.4	HI	CM	developed	0.0	correction area	750a-cm	
371W30CD7900	924 S CENTRAL AVE	0.3	HI	CM	developed	0.0	correction area	750a-cm	
371W30CD8000	S CENTRAL AVE	0.2	HI	CM	developed	0.0	correction area	750a-cm	
371W30CD8100	916 S CENTRAL AVE	0.2	HI	CM	developed	0.0	correction area	750a-cm	
371W30CD8200	912 S CENTRAL AVE	0.1	HI	CM	developed	0.0	correction area	750a-cm	

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Map/lot no.	Site Address	Acreage	GLUP existing	GLUP proposed	BLI	Adjusted Acreage	notes	PAL	sums per PAL
371W30CD8300	910 S CENTRAL AVE	0.7	HI	CM	developed	0.0	correction area	750a-cm	
371W30CD8400	828 S CENTRAL AVE	0.2	HI	CM	developed	0.0	correction area	750a-cm	
371W30CD8500	820 CENTRAL AVE B	0.5	HI	CM	developed	0.0	correction area	750a-cm	
371W30CD8600	820 S CENTRAL AVE	0.1	HI	CM	developed	0.0	correction area	750a-cm	
371W30CD8700	812 S CENTRAL AVE	0.7	HI	CM	developed	0.0	correction area	750a-cm	
371W30CD8800	724 S CENTRAL AVE	1.9	HI	CM	RED	0.0	correction area	750a-cm	
371W31AB200	1006 S CENTRAL AVE	0.4	HI	CM	developed	0.0	correction area	750a-cm	
371W31AB300	1000 S CENTRAL AVE	0.6	HI	CM	developed	0.0	correction area	750a-cm	
371W31AB400	1024 S RIVERSIDE AVE	0.8	HI	CM	developed	0.0	correction area	750a-cm	
371W31AB500	1068 S RIVERSIDE AVE	0.8	HI	CM	developed	0.0	correction area	750a-cm	
372W24DC702	929 N CENTRAL AVE	1.2	HI	CM	developed	0.0	correction area	760a-cm	0.0
372W24DD19100	909 N CENTRAL AVE	0.7	HI	CM	developed	0.0	correction area	760a-cm	
372W24DD19200	907 N CENTRAL AVE	0.4	HI	CM	developed	0.0	correction area	760a-cm	
372W24DD2700	827 N CENTRAL AVE	0.1	HI	CM	developed	0.0	correction area	760a-cm	
372W24DD2800	825 N CENTRAL AVE	0.1	HI	CM	developed	0.0	correction area	760a-cm	
372W24DD2900	823 N CENTRAL AVE	0.1	HI	CM	developed	0.0	correction area	760a-cm	
372W24DD3100	10 CLARK ST	0.2	HI	CM	developed	0.0	correction area	760a-cm	
372W24DD3200	4 CLARK ST	0.2	HI	CM	developed	0.0	correction area	760a-cm	
372W13AB1000	2825 CUMMINGS LN	2.0	UR	UH	RED	1.0		810a-uh	8.1
372W13AB1100	2902 TABLE ROCK RD	2.0	UR	UH	developed	1.0		810a-uh	
372W13AB1200	2848 TABLE ROCK RD	1.0	UR	UH	RED	0.3		810a-uh	
372W13AB1300	2810 TABLE ROCK RD	0.3	UR	UH	developed	0.0		810a-uh	
372W13AB1301	2818 TABLE ROCK RD	0.3	UR	UH	developed	0.0		810a-uh	

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Map/lot no.	Site Address	Acreage	GLUP existing	GLUP proposed	BLI	Adjusted Acreage	notes	PAL	sums per PAL
372W13AB1302	2812 TABLE ROCK RD	0.2	UR	UH	developed	0.0		810a-uh	
372W13AB1303	2816 TABLE ROCK RD	0.2	UR	UH	developed	0.0		810a-uh	
372W13AB1400	555 MIDWAY RD	0.4	UR	UH	developed	0.0		810a-uh	
372W13AB1500	529 MIDWAY RD	0.4	UR	UH	developed	0.0		810a-uh	
372W13AB1600	2772 TABLE ROCK RD	0.2	UR	UH	developed	0.0		810a-uh	
372W13AB1700	519 MIDWAY RD	0.7	UR	UH	RED	0.2		810a-uh	
372W13AB400	2761 CUMMINGS LN	1.5	UR	UH	RED	0.5		810a-uh	
372W13AB401	611 MIDWAY RD	0.2	UR	UH	developed	0.0		810a-uh	
372W13AB402	2785 CUMMINGS LN	0.2	UR	UH	developed	0.0		810a-uh	
372W13AB500	597 MIDWAY RD	1.0	UR	UH	PDR	0.8		810a-uh	
372W13AB501	611 MIDWAY RD	0.3	UR	UH	VAC	0.3		810a-uh	
372W13AB600	571 MIDWAY RD	0.5	UR	UH	RED	0.1		810a-uh	
372W13AB700	569 MIDWAY RD	0.4	UR	UH	developed	0.0		810a-uh	
372W13AB701	561 MIDWAY RD	0.1	UR	UH	VAC	0.1		810a-uh	
372W13AB900	CUMMINGS LN	3.3	UR	UH	VAC	3.3		810a-uh	
372W13AB901	2805 CUMMINGS RD	1.0	UR	UH	RED	0.3		810a-uh	
371W21D102	2893 1/2 HILLCREST RD	72.7	UR	UM	RED	4.8	subset of the lot	930a-um	4.8
371W21D102	2893 1/2 HILLCREST RD	72.7	UR	CM	RED	9.1	subset of the lot	930b-cm	9.1
371W21D102	2893 1/2 HILLCREST RD	72.7	UR	UM	RED	6.6	subset of the lot	930c-um	6.6
371W21D102	2893 1/2 HILLCREST RD	72.7	UR	CM	RED	4.3	subset of the lot	930d-cm	4.3
371W20AB3500	1380 SPRINGBROOK RD	2.5	UR	CM	RED	1.3		940a-cm	1.3
371W20AC1700	2596 E MC ANDREWS RD	2.3	UR	UM	RED	2.3		940b-um	2.3
371W20BD1000	2460 E MC ANDREWS RD	13.5	UR	UM	RED	5.4	subset of the lot	950a-um	5.4

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371W051000	CRATER LAKE AVE	4.6	GI	CM	VAC	4.6		217c-cm	12.0
371W051001	4250 CRATER LAKE AVE	3.0	UR	CM	PDR	2.7		217a-cm	
371W051002	CRATER LAKE AVE	3.2	GI	CM	VAC	3.2		217d-cm	
371W051003	CRATER LAKE AVE	1.8	UR	CM	PDR	1.5		217b-cm	
371W28A3300	HILLCREST RD	3.8	UH	CM	VAC	3.8	subset of the lot	320a-cm	3.8
372W36DD100	1708 KINGS HWY	2.2	UR	CM	RED	1.2		680a-cm	1.5
372W36DD1300	1792 KINGS HWY	1.0	UR	CM	RED	0.3		680a-cm	
371W19DB100	CRATER LAKE AVE	0.7	UH	SC	VAC	0.7	subset of the lot	960a-sc	2.4
371W19DB101	649 CRATER LAKE AVE	1.6	UH	SC	VAC	1.6	subset of the lot	960a-sc	