



CITY OF TALENT • COMMUNITY DEVELOPMENT

PO Box 445, Talent, Oregon 97540

Phone: (541) 535-7401 Fax: (541) 535-7423 www.cityoftalent.org

GENERAL LAND USE APPLICATION

Project Description: Rezone of 2.01 acre area of Commercial Highway (CH) to Multi-Family Residential (RM-22)
Property Owner: West Valley View LLC
Mailing Address: 1175 E Main Street; Ste 2A
Street Address: 300 West Valley View Road
Email Address: evanarcherd@yahoo.com
Applicant/Consultant: Rogue Planning & Development Services, LLC
Mailing Address: 33 N Central Avenue, Suite 213; Medford, OR 97501
Phone: 541-951-4020

Table with 4 columns: Assessor's Map Number (Township, Range, Section, Quarter Section), Tax Lot Number, Acres, Zone. Row 1: 38-1W- 23D, part of 1900, 2.01, CH. Row 2: 38-1W-

Subzone (if applicable) Wagner Creek Floodplain and Riparian setback; drive through overlay

Pre-Application Meeting Completed? [X] Yes [] No [] N/A Date Completed: 11/13/2019

APPLICATION TYPE (check all boxes that apply)

Grid of application types with checkboxes: Site Development Plan Review, Variance, Fence, Annexation, Accessory Dwelling Unit, Appeal, Conditional Use Permit, Home Occupation, Code Interpretation, Comprehensive Plan Amendment (text), Comprehensive Plan Map/Zoning Map Change, Development Code Amendment.

ACCURACY STATEMENT

I hereby certify that the statements and information contained in this application, including the enclosed drawings and the required findings of fact, are in all respects, true and correct. I understand that all property pins must be shown on the drawings and visible upon the site inspection. In the event the pins are not shown or their location is found to be incorrect, the owner assumes full responsibility.

Applicant's Signature: Amy Junter
Property owner's Signature (required): [Signature]

Date: 10/22/2020
Date: 10/22/2020

APPLICATION FEES & DEPOSITS

(Application fees are calculated by ACTUAL PROCESSING COSTS)

Fees and deposits are intended to cover the full cost for processing applications. Applicants seeking development which requires more than one type of review (such as site plans and conditional use permits) must pay all applicable fees and deposits.

Application Deposits: Certain application fees are represented by a deposit amount. Applicants shall be charged for actual processing costs incurred by the City. The actual costs charged to the City for technical review of land use applications, including but not limited to City's planning, public works, engineering, administration, legal, wetland specialists, geologists, biologists, arborist, and any other services provided in processing applications, shall be charged to Applicant, at the rate(s) charged to the City. In addition, the actual costs of preparing and mailing notices to abutting property owners or others required to be notified, the costs of publishing notices in newspapers, and any other mandated costs shall be charged to applicant. Any additional costs incurred beyond the deposit amount shall be charged to and paid by the applicant on a monthly basis. The applicant agrees that any deficiencies shall be collected from applicant, and that applicant's failure to pay these amounts triggers the City's option to pursue any or all remedies, as listed below.

Fixed Fee Applications: Fees are non-refundable and are based on average application processing costs rounded to the nearest dollar.

Applicant acknowledges and agrees that Applicant's failure to pay City costs over the deposit fee amounts, as charged monthly by the City, may result in the City pursuing any or all legal remedies available, including but not limited to liening property in the amount owed; prosecution for violation of the City's current fee resolution and City land development or division ordinances; issuance of a stop work order, non-issuance of building permits for property, or cessation of related proceedings; set-off against any reimbursement owed; and turning amounts owed over to a collection agency.

Amy Gunter

Applicant's Signature

10/22/2020
Date

James D. ...

Property owner's Signature (required)

10/22/2020
Date

I hereby acknowledge that my applications may be consolidated. When an applicant applies for more than one type of land use or development permit (e.g., Type-II and III) for the same one or more parcels of land, the proceedings shall be consolidated for review and decision. If more than one approval authority would be required to decide on the applications if submitted separately, then the decision shall be made by the approval authority having original jurisdiction over one of the applications in the following order of preference: (1) City Planner, (2) the Planning Commission, and (3) the City Council. Joint meetings between governing bodies may be held to streamline the decision process.

Applicant's Signature

Date

Property owner's Signature (required)

Date

PAC 2019-006

FOR OFFICE USE ONLY			
Deposit Paid (Amount)	Date	Received by	File Number
\$5140.00	11/18/2020	JEFF WILCOX	CPA 2020-001 + REZ 2020-001

In compliance with the Americans with Disabilities Act, if you need special assistance, please contact TTY phone number 1-800-735-2900 for English and for Spanish please contact TTY phone number 1-800-735-3896.

The City of Talent is an Equal Opportunity Provider

West Valley View LLC

Request for Comprehensive Plan Amendment and Zone
Change from Commercial Highway to High Density Multi-
Family Residential

300 West Valley View Road

Amy Gunter
[Date]

Comprehensive Plan Amendment and Zone Change

Subject Properties

Property Addresses: 300 W Valley View Road

Map & Tax Lot: 38 1W 23D; Part of 1900

Comprehensive Plan

Designation: Commercial

Zoning: Commercial Highway (CH)

Property Owner: West Valley View LLC
C/O Evan Archerd
1171 W Main Street STE 2A
Medford, OR 97501

Surveying: L.J. Friar and Associates
PO BOX
Medford, OR 97501

Site Planning: Terrain Landscape Architecture
174 Hidden Lane
Ashland, OR 97520

Agent: Rogue Planning & Development Service, LLC
33 N Central Avenue, Suite 213
Medford, OR 97501

Request:

The request is for a Comprehensive Plan amendment and Zone Change request to re-zone the 2.01-acre parcel that was recently partitioned from the larger lot area of 14.68 acres. The subject property was created via file #2020-0003. The Comprehensive Plan Designation is Commercial, and the request is to amend the Comprehensive Plan Designation to Residential High Density (rh). Also, the request is to rezone the property from Commercial – Highway Commercial (CH) to Multiple Family – High Density (RM-HD).

Property Description:

The subject property is located on the south side of Valley View Road at 300 W Valley View Road. The property has 65 feet of frontage along Valley View Road and extends more than 500-feet to the south. The lot is 2.01-acres, the site has 0.806 acres of usable land (net acreage). Valley View Road has an 80-foot wide right-of-way on the north. Mountain View Drive, a 40-foot wide private street with an ingress/egress access easement on the east. Wagner Creek on the west side of the property and Hwy. 99 along the south property line.

The property has a Comprehensive Plan Map designation of Commercial (c) and is zoned Highway Commercial (CH). The property to the west is also zoned CH. The property to the west is zoned Residential, Single Family – Manufactured Home (RS-MH). There is also Highway Central Business District (CBH) zoned properties to the south and to the east property line. Across West Valley View Road, the properties are zoned CH and RM-HD. The subject property and the adjacent properties have the “drive-through overlay” subzone.

The Wagner Creek, is designated as a Federal Emergency Management Agency (FEMA) designated Floodway and a 100-year floodplain are present on the property. There is a 50-foot “safe harbor” setback from Wagner Creek for riparian zone preservation.

A tree inventory has been provided on the topographical survey of the property.

Proposal:

The request is for Comprehensive Plan Map Change and Zone Change from Commercial Highway (CH) to High-Density Residential (RM-HD) for the property located at 300 W Valley View. The requested zone change conceptually allows for the construction of ten (10) residential townhome units.

According to the City of Talent Buildable Lands Inventory, the current housing inventory severely lacks High Density Residential zoned land that is suitable for development.

Based on the review of the Buildable Lands Inventory, there appears to be substantial amount of vacant and/or redevelopable commercial zoned properties. The Commercial Highway Zone (CH) properties do not allow residential development. Additionally, there appears to be a substantial amount of vacant and/or redevelopable commercial zoned Commercial Business Highway (CBH) properties.

The proposed density of ten (10) townhome dwelling units is consistent with the expected density per acre when considering the limited area of site development due to the riparian buffer zone of Wagner Creek. The future development of the site utilizes the land and existing utility infrastructure efficiently.

The proposed Comprehensive Plan modification and Zone change will not create lots which do not comply with minimum lot areas for the zone.

The requested Comprehensive Plan Map change and Zone change appears to be consistent with the Comprehensive Plan. Specifically, Element G, The Housing Element and the stated goals found within the Housing Element. According to the Housing Element, the City of Talent will need an additional 109 acres of residential land to meet the projected population growth; 77 acres of Low-Density Residential Land, 17 acres of Medium Density Residential land, and 15 acres of High-Density Residential and mixed-use Commercial land. The Buildable Land Inventory found that with a deficit of nearly 109 acres of residential land, Talent does not have an adequate supply of residential land to meet the 20-year projected demand within its current UGB.

Last year, a one-acre area was rezoned from Commercial to Residential. The area of the subject lot at two acres, though not sizeable, provides an additional land area for High-Density Residential adjacent to the transportation corridor.

The proposal is consistent with the State of Oregon Land Use Planning Goals. At a local level, the State mandates that cities inventory their "buildable lands", this refers to land inside an urban growth boundary that is suitable and available for residential use. Local jurisdictions are to assure there is enough land available to achieve the five-year supply minimum of land area to accommodate the population growth expected. Goal 10 encourages cities to provide Comprehensive plans that encourage the availability of adequate numbers of 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.

Additionally, the proposal seeks to provide additional land area consistent with the Statewide Planning Goal 14 for Urbanization by allowing the change of vacant, marginal commercial land to a viable urban, residential use.

The request zone change conceptually allows for the development of ten (10) attached wall, townhome units. These units will generate approximately 70 daily vehicle trips. The property is located on West Valley View Road, and due to the limited number of trips, the proposed zone change will not have a substantial negative impact on the level of service of any of the intersections in the immediate vicinity. Multi-Modal Transportation options are provided in the vicinity of the property with the Rogue Valley Transportation District (RVTD) bus service on Hwy 99. Bike lanes are found on West Valley View Road and Hwy. 99. A Traffic Impact Analysis is not necessary because the total number of vehicle trips is below the thresholds and the AM and PM peak hour trips.

The City of Talent Zoning Code does not provide criteria for zone change requests. This proposal, therefore, demonstrates the request is consistent with applicable zoning regulations for the RM-HD and the Commercial zones. The application also addresses how the proposal is supported by

the Comprehensive Plan of the City of Talent and is consistent with the Regional Problem Solving Plan as adopted in 2012. Findings addressing the Transportation Planning Rule (TPR) are provided within the Traffic Impact Study consistent with TZC 18.185.

The proposed zone change from Commercial to Residential is not considered “spot zoning”. Spot zoning is when a small parcel of land is rezoned to a use classification that is totally different from that of the surrounding area and for the benefit to the owner of the property and where the rezoning is a detriment of other owners. The proposed zone change is compatible to the existing residential zone and use of the immediately adjacent property. Though the Talent Comprehensive Plan calls for the manufactured housing parks to be commercially zoned in the future. Due to the present situation following the Alameda fires, emergency action was taken to prevent changes in the use of those properties from manufactured housing to anything else, preserving the residential zone and use. The proposed zoning is also compatible to the use of the property diagonally to the east, across West Valley View Road is also residential.

On the following pages, findings of fact addressing the criteria from the Talent Municipal Code are provided. For clarity, the criteria is in Times New Roman font and the applicant’s findings are in Calibri font.

FINDINGS OF FACT

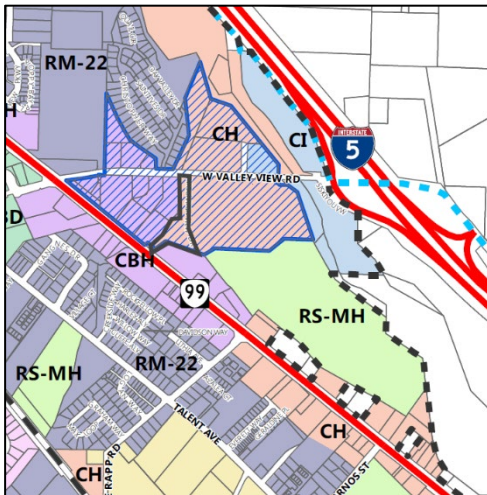
Talent Zoning Code:

18.10.030 Establishment of Zones by Map

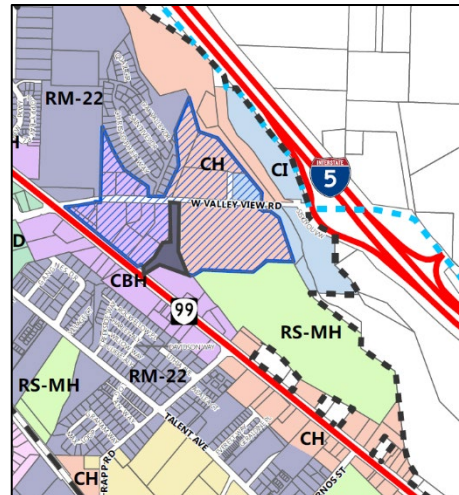
A. The location and boundaries of the zones designated in TMC [18.10.020](#) are hereby established as shown on the map entitled “The Zoning Map of the City of Talent,” bearing the number of the ordinance codified in this title and authenticated by the signature of the mayor and city recorder endorsed thereon at the time of the passage of the ordinance codified in this title. The map shall be hereinafter referred to as the “zoning map.” An updated zoning map was adopted by Ordinance No. [817](#) (November 1, 2006) along with the reorganization of the zoning code.

Finding:

The zoning map of the City of Talent is found below on the left. The proposed revised zoning map has been provided on the right.



Zoning Map



Proposed Zoning Map

18.10.040 Boundaries of Zones

Where uncertainty exists as to the boundaries of any zone as shown on the zoning map, the following rules shall apply:

A. Where such boundaries are indicated as approximately following street or alley centerlines or right-of-way lines, or lot lines, such lines shall be construed to be such boundaries.

Finding:

Not applicable.

B. If the zone boundary line divides a lot into two or more zones, the entire lot shall be placed in the zone that accounts for the greater area of the lot by the adjustment of the zone boundary; provided, that the boundary adjustment is for a distance of less than 20 feet. If an adjustment of more than 20 feet is required, the change in the zone boundary shall be treated as a change of zone.

Finding:

A zoning boundary does not presently divide the property, the property is zoned Highway Commercial (CH) and the adjacent properties to the north and west are zoned Highway Central Business District (CBH). The property abutting the southeast corner of the subject parcel is zoned residential. Specifically, single family, manufactured housing.

C. In the case of un-subdivided property, and where a zone boundary divides such property (except as provided in subsection (B) of this section), the location of such zone boundaries shall be determined by the use of the scale appearing on said zoning map.

Finding:

The property has been partitioned recently. The proposed zone change follows the property boundaries.

D. Areas of dedicated streets or alleys and railroad rights-of-way which are not designated on the zoning map as being classified in one of the zones provided in this title shall be deemed to be unclassified and, in the case of railroad rights-of-way, shall be permitted to be used solely for the purpose of accommodating tracks, signals, other operative devices and the movement of rolling stock. [Ord. 817 § 8-3A.240, 2006.]

Finding:

There are no areas of dedicated streets of alleys or railroad rights-of-way on the subject property. The right-of-way of West Valley View does not appear to be designated on the zone map as a Talent zone.

18.10.050 Zoning of Annexed Areas

Zoning regulations in effect in an area prior to annexation to the city shall continue to apply and shall be enforced by the city until such time as a zone change has been adopted or a new zone created by the city for the annexed area. Newly created zoning districts shall conform to the city's comprehensive plan.

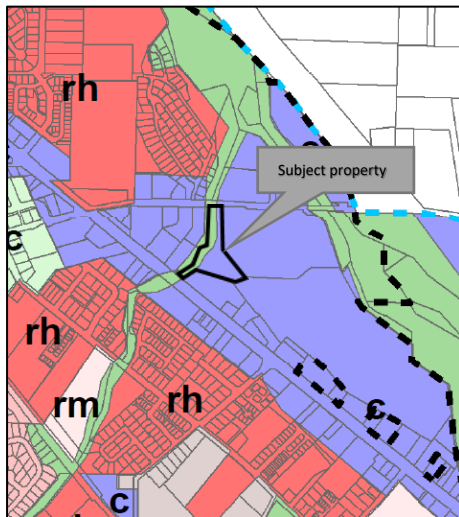
Finding:

The proposed area of the requested zone change from Commercial Zone – Highway Commercial (CH) to Residential High Density (RM-HD) has been within the city limits for decades and this

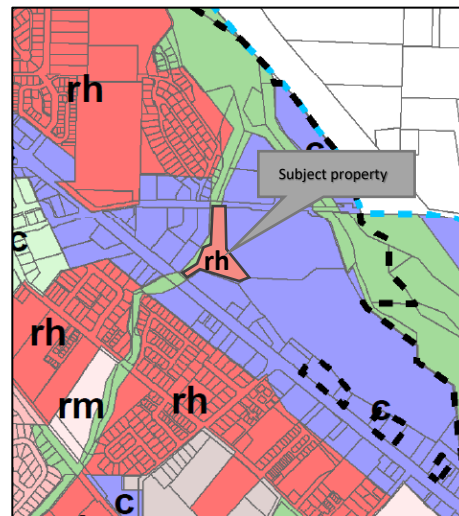
application is not an annexation. The proposal requests a modification of the city's comprehensive plan.

The Comprehensive Plan Designation of the area of the property seeking rezoning from Commercial to Residential is presently designated as Commercial on the Comprehensive Plan Map. The current zoning does not allow for the development of residential housing.

The Comprehensive Plan Map is requested to be amended to reflect the requested change.



Existing Comprehensive Plan



Proposed Comprehensive Plan

18.10.060 Dimensional Standards by Zone

Finding:

The subject property proposed for rezoning exceeds minimum lot area for the Residential, Multi-Family, High Density (RM-HD) zone. The lot area at 87,461 square feet exceeds 6,000 square feet. The width exceeds 50-feet with 63.15-feet of frontage upon West Valley View Road.

The future development of the property will demonstrate compliance with the Site Plan Review standards for multi-family development. Additionally, future development will need to address the Floodplain Development Standards and construction must comply with the Federal standards for construction in a floodplain.

Future development of the RM-HD zone area will need to demonstrate compliance with the minimum standards found in section Dimensional Standards by Zone (TZC 18.10.060).

18.40. Residential Zone – Multiple Family – High-Density (RM-HD)

18.40.010 Description and Purpose:

The residential – multiple-family – high-density (RM-HD) zone is intended to provide a healthful and livable residential environment, together with the full range of urban services, for housing

units at densities higher than provided for in other residential zones. This zone is also intended to accommodate housing alternatives to conventional housing and an area where small economic enterprises, such as home occupations and neighborhood commercial activity, can occur indistinguishably or compatibly with the residential character. It is generally intended that high-density residential zones will be situated in close proximity to activity centers and major streets. [Ord. 952 § 1 (Exh. A), 2019; Ord. 951 § 1 (Exh. A), 2019; Ord. 943 § 1 (Exh. A), 2018; Ord. 817 § 8-3C.410, 2006.]

Finding:

The proposal is to increase the area within the city of Talent that is zoned for high-density, multiple-family, residential development. The proposed zone change is in an area with convenient access to a full range of urban services including pedestrian and bicycle facilities, transit, urban level infrastructure including adequate potable water, sewer, storm drainage and electricity. The proposed area for RM-HD zoning is adjacent to other high-density residential zoned property. The property is accessed by vehicles, pedestrian and bicycles from Talent Avenue. Upon the development of the commercial development along the highway, pedestrian access through to Oregon Hwy 99 will be provided. Talent Avenue and OR Hwy 99 are major streets.

The lot proposed for rezone allows for ten (10) residential dwelling units. The lot area is 2.01 acres of which .806 acres is developable. A conceptual site plan demonstrating the area of the property proposed for rezoning has adequate area for the residential units, landscape buffers and parking areas has been provided with the application.

All future development of the RM-HD zoned area will conform to the process, procedures and development standards for Multiple Family developments found in TZC 18.40.

City of Talent Comprehensive Plan Compliance:
Comprehensive Plan Element A. Citizen Involvement.

Finding:

A public hearing before the Planning Commission and the City Council. The public is notified of the public hearings through both direct mailing (those directly adjacent to the property) by the city of Talent Community Development Department Staff, and with a sign on the property that notifies the citizens at large. A notice is also published in the newspaper. The State of Oregon Department of State Lands is also notified of the requested zone change.

Element B. Parks: Recreation, Open Space and Urban Forestry.

Finding:

The property is not required to provide for a public park as determined by the 2006 Talent Parks Master Plan.

With future development there will be required open spaces. In addition to those private open spaces required for each townhome, there will a large area of open space provided due to the 50-foot riparian buffer of Wagner Creek.

There are a number of trees on the site that contribute to the “urban forest”. Those present in the area of future development include 6” DBH – 24” DBH willow and cottonwood trees. There are three, 12” fir trees. These trees will be removed to facilitate development. Upon completion of the development, the removed trees will be mitigated for. As the mitigation trees grow and mature, they will provide the community oxygen, improved air quality, increased enjoyment of the complex and temperature moderation in the summer months.

Element C. Natural Hazards

Finding:

The property is identified as having FEMA Floodway, FEMA 100 year and 500-year floodplains on the property. The future development will require a Site Plan and Architectural Review, and a floodplain development permit. The structures will be constructed to the applicable building and fire safety codes, anchored and raised to have the finished floor and outdoor equipment such as the heat pump two feet above the base flood elevation on the property. Tenants will be encouraged to purchase renter insurance to cover the costs of their personal effects in the event of an event. The proposed construction methods including raised finished floors, structural engineering, fire sprinklers where required, etc., provide the tenants protections from natural hazards such as earthquakes that older complexes in town do not necessarily provide.

On site stormwater detention, retention, treatment, etc. will be required by the Rogue Valley Stormwater Quality Design Standards Manual when the development proposal is made. The RVSQ Design Manual requires reductions in the amount of impervious surface run-off into the storm drain system which drains eventually into Bear Creek.

The site is relatively flat and is not subject to landslides.

The future landscaping will be drought resistant and of native species, and not including large conifers reduces the on-site wildfire potential.

Element D. Transportation System Plan

Finding:

West Valley View Road is a Minor Arterial street. West Valley View Road is “improved” to city standards that applied at the time of the street development.

Adequate parking facilities for vehicles and bicycles will be provided with future development of the property requested for rezone from Commercial to Residential.

Further, a Traffic Impact Study has been conducted that found that the number of vehicle trips generated by a rezoning of Commercial Highway to Residential, even high-density, multi-family, generally has fewer vehicle trips that what is anticipated for large tracts of commercial land abutting the highway. The proposed zone change will not cause any of the intersections in the vicinity to operate at or below level of service (LOS) D.

The proposal will not have an impact on the West Valley View Road projects outlined in the Transportation System Plan. The West Valley View Road project is to convert West Valley View Road from its current layout to three lanes with a buffered bike like between OR 99 and the Bear Creek Greenway.

Element E. Economy

Finding:

The requested zone change of 2.01 acres from Commercial to Residential will have little to no impact on the substantial amount of vacant or partially vacant commercial land which currently is roughly 62.47 acres.

According to the Economic Element, Talent has nearly 63 acres of commercial land and the employment forecast from 2016 to 2036 calls for a demand of 17 acres of commercial land. This means that Talent has more commercial land than the City is projected to need over a 20-year period with a surplus of 45 acres. The change of 2.01 acres of the more than 60 acres of commercial land will not have a negative impact on the potential commercial development to provide employment in the City of Talent (Talent Economic Opportunities Analysis (2016), ECONorthwest., Page 64).

Element F. Public Facilities and Services Element

Finding:

The requested zone change will not have an adverse financial, environmental or social impact on the citizens of Talent.

With future development it can be found that there is adequate potable water, Sanitary Sewer services, Storm Water, Electric service, trash and recycling services and transportation services are available to service the property.

The future residential and commercial development in the area will not have an adverse impact on the operations of the various utility services.

Element G. Housing

Finding:

Perhaps the most critical Comprehensive Plan element is Housing. According to the Housing Element, the City of Talent will need an additional 109 acres of residential land to meet the projected population growth for the next 20 years. Of the needed housing types, there is a need for 77 acres of Low-Density Residential Land, 17 acres of Medium Density Residential land and 15 acres of High Density Residential and mixed-use Commercial land. The Buildable Land Inventory found that with a deficit of nearly 109 acres of residential land, Talent does not have an adequate supply of residential land to meet the 20-year projected demand within its current UGB.

The property proposed for rezoning is 2.01 acres. Of this, there is .806 acres that are outside of the Floodway and the 50-foot riparian buffer or safe harbor zone. With the allowed up to 24 percent reduction for infrastructure, there is .6126 net acres of development area. The proposed ten units is consistent with the envisioned density of 18 units per net acre by providing ten units.

Though not an area of significant acreage, the just over half of an acre of development area provides additional land area for High Density Residential development.

Element H. Urban Reserve Areas

Finding:

The property is not identified as an Urban Reserve Area from the Regional Plan. The proposal is consistent with the city growth guidelines and policies as affirmed during the Regional Planning Process. The proposal decreases the area of vacant commercial lands which Talent has a surplus of and increases the area for high density, multi-family housing which Talent has a current deficiency of.

Element I. The History of Talent and Historic Preservation Policies

Finding:

Not applicable as the property is occupied by non-historic, non-conforming residential structures.

Compliance with Statewide Planning Goals:

Statewide Planning Goal 1 – Citizen Involvement:

Finding:

Talent’s Comprehensive Plan Addresses Citizen Action Committees that advise the Planning Commission and City Council. With zone changes, the Planning Commission, a public body with appointed citizen volunteer members, is the first to review the proposal. This meeting will be held consistent with local and state laws that allow citizen testimony.

Statewide Planning Goal 2 – Land Use Planning:

Finding:

The proposal demonstrate compliance with the City of Talent Comprehensive Plan Goals and Policies. Additionally, future development of vacant multi-family residential land will demonstrate compliance with the applicable zoning ordinances applicable to the types of future development proposed for the parcels.

Statewide Planning Goal 9 – Economy:

Finding:

The proposal will not have a negative impact on the surplus of commercially zoned land in the City of Talent. The Economic Opportunities Analysis project there is adequate commercial land to provide for the 20-year population growth and this will not impact the supply.

Statewide Planning Goal 10 – Housing:

Finding:

Goal 10 encourages cities to provide Comprehensive plans that encourage the availability of adequate numbers of 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. This proposal allows for there to be more residential land than presently provided of which there is an identified deficient to nearly 15 acres. Though not a substantial area of additional land for housing, it does provide adequate area for ten (10) attached wall, townhome units.

Statewide Planning Goal 12 – Transportation:

Finding:

The findings addressing the Comprehensive Plan Element D, Transportation demonstrate that the proposal provides adequate transportation for vehicles, bicycles, and pedestrians. There is transit service in the vicinity. Transportation Planning Rule findings are provided. There are bicycle lanes and sidewalks along (or proposed) along the West Valley View frontage of the property.

Conclusion:

It can be found that the proposed zone change from Highway Commercial (CH) which does not allow for residential development to High-Density Residential (RM-HD) is consistent with the Goals and Policies of the City of Talent Planning Commission and City Council to further development of additional multi-family residential rental units to increase the supply of available rentals within the city.

According to the most current data available from the Buildable Lands Inventory, the slight reduction in the area of buildable, vacant commercial land which the city has an adequate supply of, to a multi-family residential zone provides a benefit to the community by allowing for new residential development in an area of current, multi-family residential development.

The commercially zoned lands in the vicinity are not negatively impacted by the zone change and the adjacent residential development will not be negatively impacted by future residential development.

The increase in residential density increases the potential business customers and clients in the vicinity. Additionally, additional residential density provides housing for employees of the commercial developments.

There is not a lack of commercial and employment lands within the City of Talent, there is a severe housing shortage. Though not a large development, lot by lot, unit by unit, Talent can address their lack of residentially zoned lands available for residential development.

Thank you for your consideration.

Attachments:

- Transportation Planning Rule Findings
- Existing Zoning Map
- Proposed Zoning Map
- Existing Comprehensive Plan Map
- Proposed Comprehensive Plan
- Topographical survey
- Conceptual Site Plan

SOUTHERN OREGON TRANSPORTATION ENGINEERING, LLC

319 Eastwood Drive - Medford, Or. 97504 – Phone (541) 608-9923 – Email: Kim.parducci@gmail.com

June 17, 2020

Amy Gunter
Rogue Planning & Development Service
33 N Central Ave., Suite 213
Medford, Oregon 97501

RE: Comprehensive Plan Map Amendment / Zone Change - Trip Generation Evaluation

Dear Amy,

Southern Oregon Transportation Engineering, LLC prepared a trip generation evaluation for a proposed comprehensive plan map amendment and concurrent zone change on 2.01 acres of tax lot 1900 (recently created through a minor land partition MLP 2020-030) located on Township 38S Range 1 West Section 23D in Talent, Oregon. The minor land partition created the subject 2.01-acre parcel, which has approximately 0.806 acres of usable land (net acreage). The plan map designation and zoning on both parcels is currently Commercial (C) and Commercial Highway (CH). A plan amendment and zone change is proposed from C/CH to Residential High Density (RH)/Residential Multiple-Family High Density (RM-HD), to facilitate development of 10 multiple-family units.

Plan Map Amendment & Zone Change Evaluation

In order to satisfy the requirements of a plan map amendment and zone change, the applicant must demonstrate compliance with Goal 12 of Oregon's Statewide Land Use Planning Goals. Goal 12 requires cities, counties, and the state to create a transportation system plan that takes into account all relevant modes of transportation. The Transportation Planning Rule (TPR) implements Goal 12 and specifies what must be included in local planning efforts. The administrative rule that implements Goal 12 is Oregon Administrative Rule (OAR) 660-12-0060 (1), which specifically addresses plan and land use regulation amendments.

OAR 660-012-0060 (1): Plan and Land Use Regulation Amendments

If an amendment to a functional plan, an acknowledged comprehensive plan, or a land use regulation (including a zoning map) would significantly affect an existing or planned transportation facility, then the local government must put in place measures as provided in section (2) of this rule. A plan or land use regulation amendment significantly affects a transportation facility if it would:

- (a) Change the functional classification of an existing or planned transportation facility
- (b) Change standards implementing a functional classification system; or
- (c) Result in any of the effects listed in paragraphs (A) through (C)
 - (A) Types or levels of travel or access that are inconsistent with the functional classification of an existing or planned transportation facility
 - (B) Degrade the performance of an existing or planned transportation facility such that it would not meet the performance standards identified in the TSP or comprehensive plan; or
 - (C) Degrade the performance of an existing or planned transportation facility that is otherwise projected to not meet the performance standards identified in the TSP or comprehensive plan.

Compliance with the TPR is achieved if a proposed land use change does not result in additional trips or a greater impact on the transportation system. This argument is made based on a comparison of reasonable "worst-case" uses for both existing and proposed zones. The proposed zone change from CH

to RM-HD is considered a down-zoning because commercial uses within the CH zoning district are estimated to generate a higher number of trips than residential uses within the RM-HD zoning district. This is demonstrated below:

Existing Zoning (CH):

The City of Talent Commercial Highway (CH) zone (Chapter 18.60 of the municipal code) allows a range of commercial uses including, but not limited to, drive-through coffee stands, fast-food restaurants, retail uses, service stations, veterinary clinics, and breweries. Of these uses, the highest generator of primary trips (net trips) to the transportation system that could fit on this size of a site is a fast-food restaurant with drive-through. The average size of a fast-food restaurant with a drive through is 3,000 square feet.

Proposed Zoning (RM-HD):

The highest uses within the City of Talent Residential Multiple-Family-High Density (RM-HD) zone (Chapter 18.40 of the municipal code) applicable to the site are multiple-family dwellings, attached single-family dwellings (condominiums, row houses, townhouses), boarding and rooming houses, and parks and playgrounds. Of these uses, multiple-family dwellings generate the highest number of trips. The maximum number of units shown to fit on the 0.807 net acres is 10 units, which is used in our analysis as the “worst-case” scenario.

Trip generation calculations for existing and proposed “worst-case” land uses were prepared utilizing data provided in the Institute of Transportation Engineers (ITE) *Trip Generation* 10th Edition. Pass-by trips were considered in accordance with ITE pass-by rates. Results are summarized in Table 1. ITE graphs are provided in the attachments.

Table 1 – Trip Generations							
ITE Land Use	Unit	Size	Daily Trips	AM Peak Hour		PM Peak Hour	
				Rate	Total	Rate	Total
Existing Zoning (CH)							
934 – Fast-Food with drive through	1000 SF	3.00	1412	40.19	120	32.67	98
			Pass-by 50%		(706)		(60)
			Total Existing Trips		706		60
Proposed Zoning (RM-HD)							
220 – Multifamily Residential	Units	10	73 ADT	0.46	5	0.56	6
			Total Proposed Trips		73		5

SF = Square Footage, ADT = Average Daily Trips

As seen in Table 1, proposed RM-HD zoning is shown to generate fewer vehicle trips than existing CH zoning on the transportation system.

Findings and Conclusions

The proposed comprehensive plan map amendment and zone change from Commercial (C)/Commercial Highway (CH) to Residential High Density (RH)/Residential Multiple-Family High Density (RM-HD) on 0.807 net acres, located along the south side of West Valley View Drive, east of Wagner Creek, results in a reduction of trips to the transportation system. As a result of generating fewer trips to the transportation system, the proposed plan amendment and zone change is not shown to change the functional classification of an existing or planned transportation facility, change the standards implementing a functional classification system, or result in any of the effects listed in paragraphs (A)-(C) of OAR 660-012-0060 (1). The TPR is, therefore, satisfied.

Additionally, a traffic impact study is required in accordance with Chapter 18.185 of the Talent municipal code if any of the following actions exist:

1. A zoning or comprehensive plan map or text amendment is projected to generate 500 or more net daily vehicle trips.

The net daily vehicle trips from the proposed land use action is negative (-) 633 ADT

2. A development proposal is projected to generate 50 or more net peak hour trips on an arterial or collector segment or intersection.

The net peak hour trips from the proposed land use action is negative (-) 55 AM, (-) 43 PM

3. A land use action or development proposal will impact known safety, congestion, or capacity problems.

A reduction in net trips to the transportation system will not further impact any known safety, congestion, or capacity problems

4. A land use action or development proposal is on a highway segment with special access control.

The proposed land use action does not include a parcel on a highway segment

Based on these findings, it is concluded that the proposed plan amendment and concurrent zone change complies with the TPR and is not shown to require a traffic impact study (TIS) based on Chapter 18.185 of the Talent municipal code. Please feel free to contact me if you have any questions or need additional information.

Sincerely,



Kimberly Parducci PE, PTOE

SOUTHERN OREGON TRANSPORTATION ENGINEERING, LLC

Attachments: ITE Graphs



ATTACHMENTS

Multifamily Housing (Low-Rise) (220)

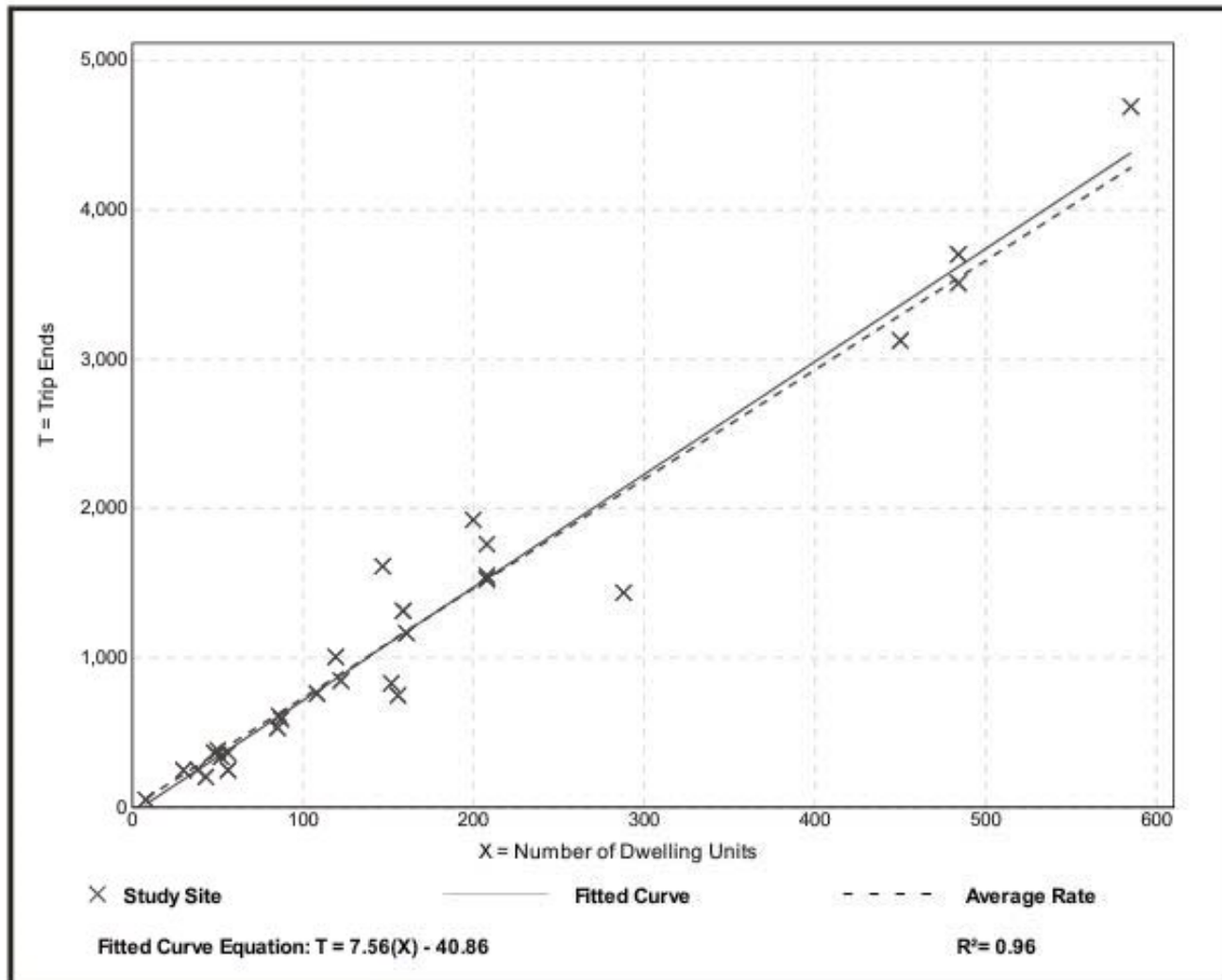
Vehicle Trip Ends vs: Dwelling Units
On a: Weekday

Setting/Location: General Urban/Suburban
Number of Studies: 29
Avg. Num. of Dwelling Units: 168
Directional Distribution: 50% entering, 50% exiting

Vehicle Trip Generation per Dwelling Unit

Average Rate	Range of Rates	Standard Deviation
7.32	4.45 - 10.97	1.31

Data Plot and Equation



Multifamily Housing (Low-Rise) (220)

Vehicle Trip Ends vs: Dwelling Units

On a: Weekday,

Peak Hour of Adjacent Street Traffic,
One Hour Between 7 and 9 a.m.

Setting/Location: General Urban/Suburban

Number of Studies: 42

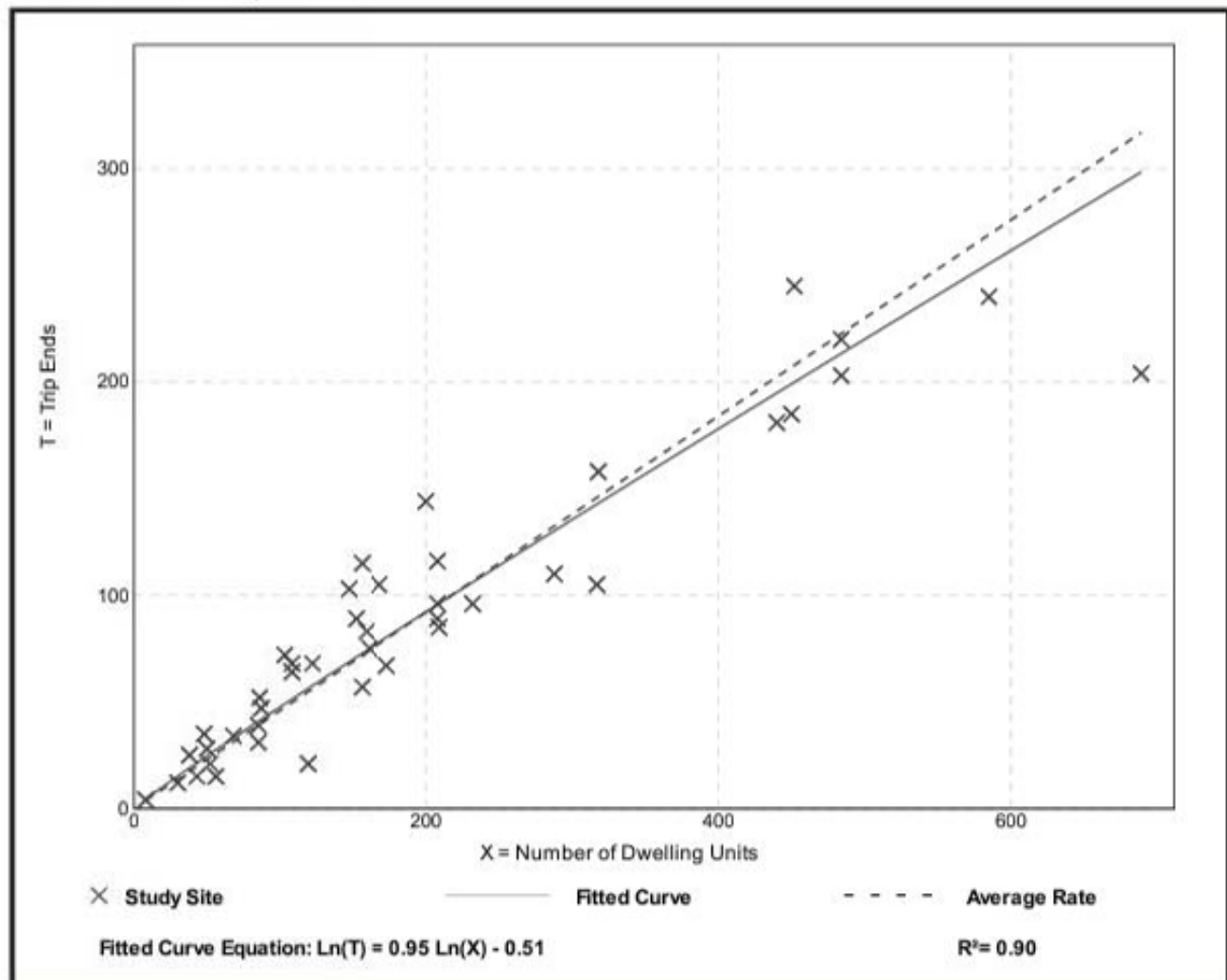
Avg. Num. of Dwelling Units: 199

Directional Distribution: 23% entering, 77% exiting

Vehicle Trip Generation per Dwelling Unit

Average Rate	Range of Rates	Standard Deviation
0.46	0.18 - 0.74	0.12

Data Plot and Equation



Multifamily Housing (Low-Rise) (220)

Vehicle Trip Ends vs: Dwelling Units
 On a: Weekday,
 Peak Hour of Adjacent Street Traffic,
 One Hour Between 4 and 6 p.m.

Setting/Location: General Urban/Suburban

Number of Studies: 50

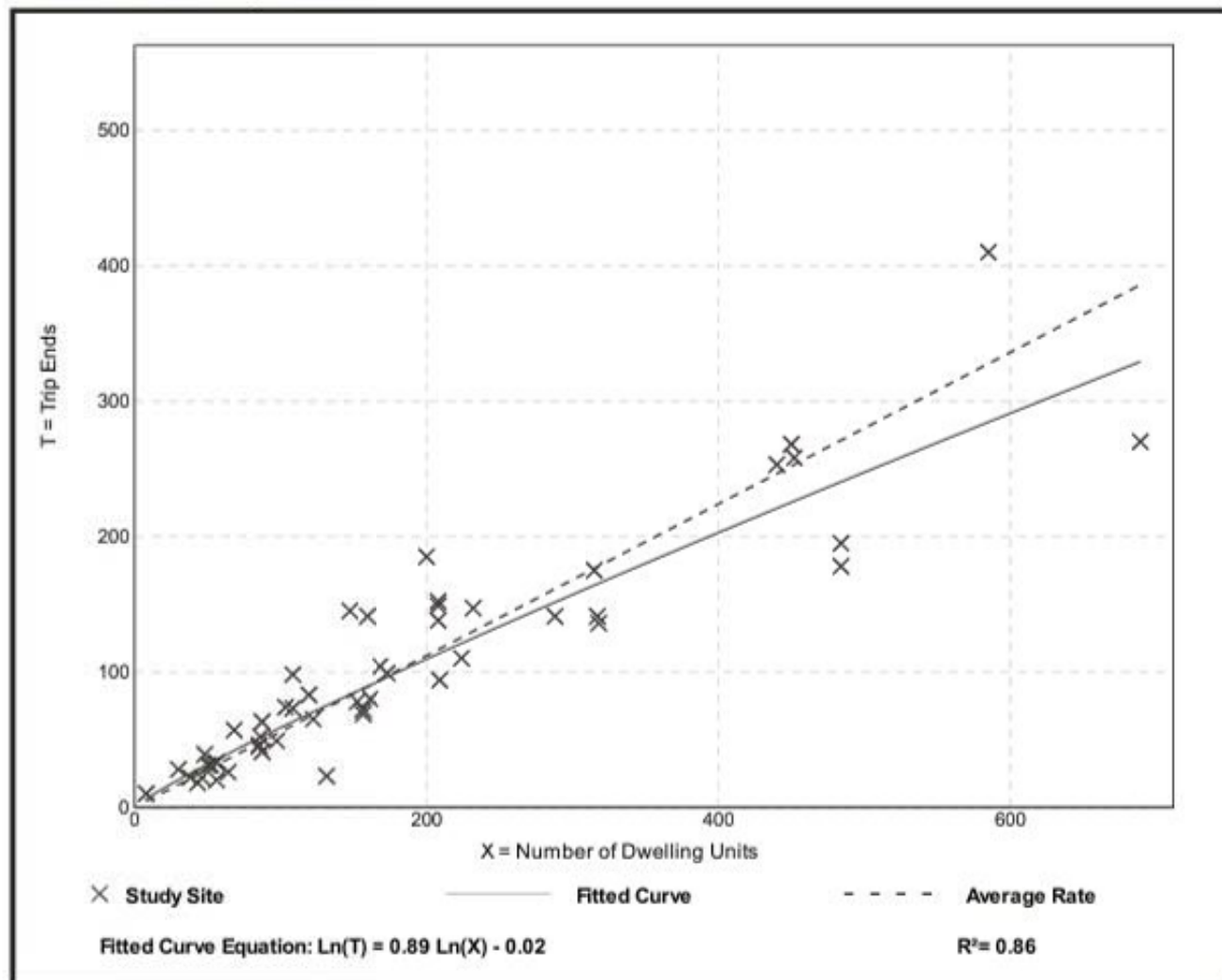
Avg. Num. of Dwelling Units: 187

Directional Distribution: 63% entering, 37% exiting

Vehicle Trip Generation per Dwelling Unit

Average Rate	Range of Rates	Standard Deviation
0.56	0.18 - 1.25	0.16

Data Plot and Equation



Fast-Food Restaurant with Drive-Through Window (934)

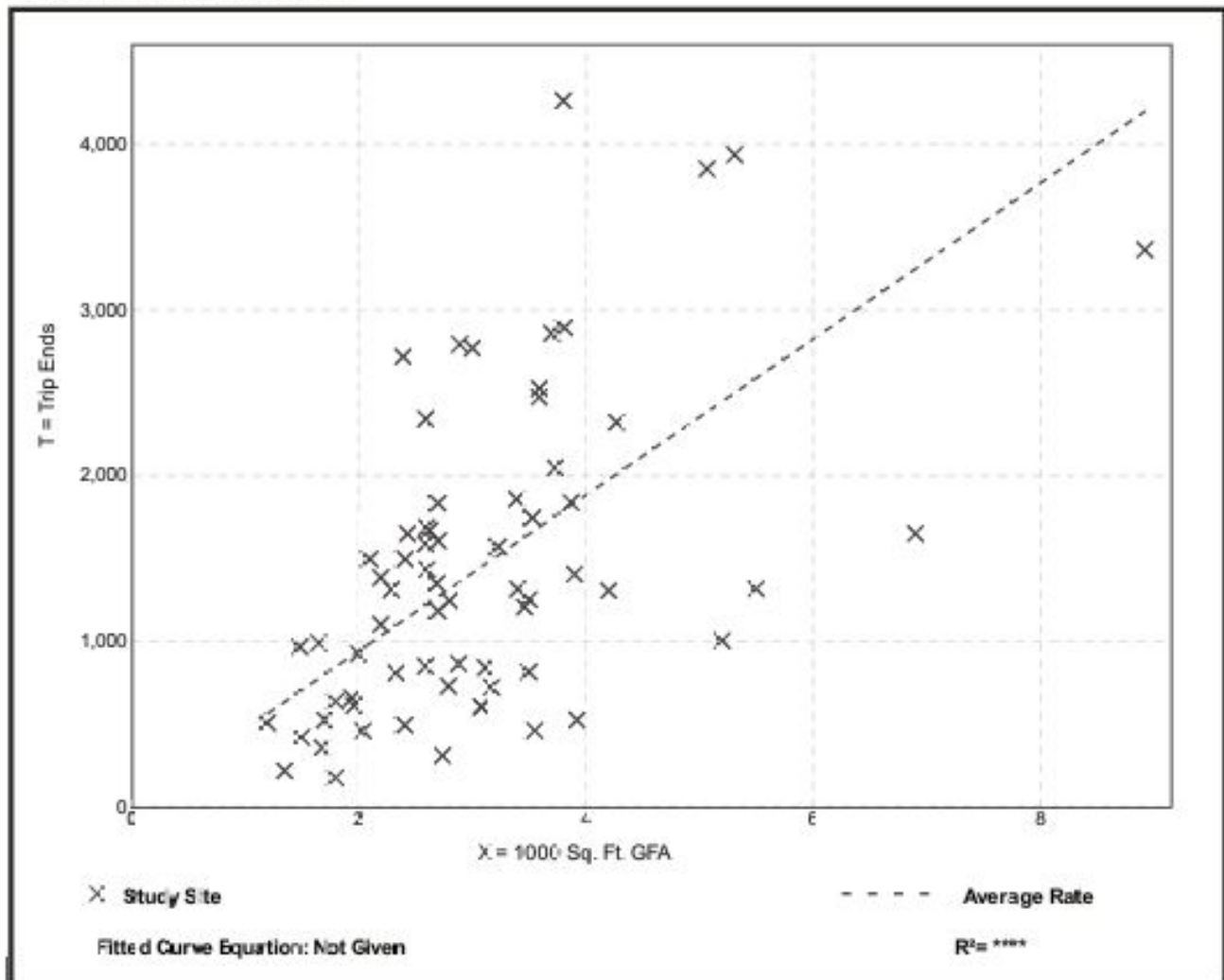
Vehicle Trip Ends vs: 1000 Sq. Ft. GFA
On a: Weekday

Setting/Location: General Urban/Suburban
Number of Studies: 67
1000 Sq. Ft. GFA: 3
Directional Distribution: 50% entering, 50% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
470.95	98.89 - 1137.66	244.44

Data Plot and Equation



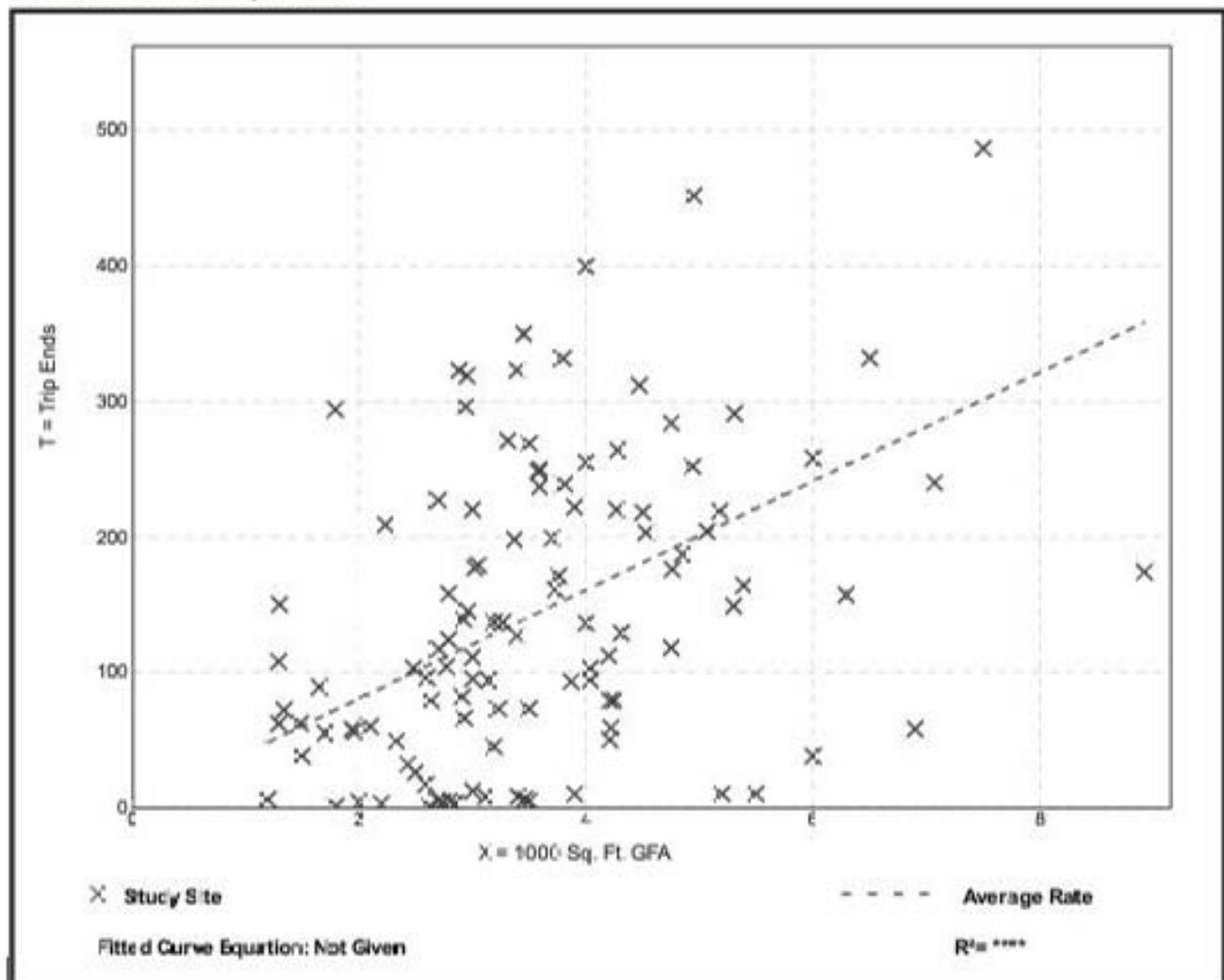
Fast-Food Restaurant with Drive-Through Window (934)

Vehicle Trip Ends vs: 1000 Sq. Ft. GFA
On a: Weekday,
 Peak Hour of Adjacent Street Traffic,
 One Hour Between 7 and 9 a.m.
Setting/Location: General Urban/Suburban
 Number of Studies: 111
 1000 Sq. Ft. GFA: 4
 Directional Distribution: 51% entering, 49% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
40.19	0.38 - 164.25	28.78

Data Plot and Equation



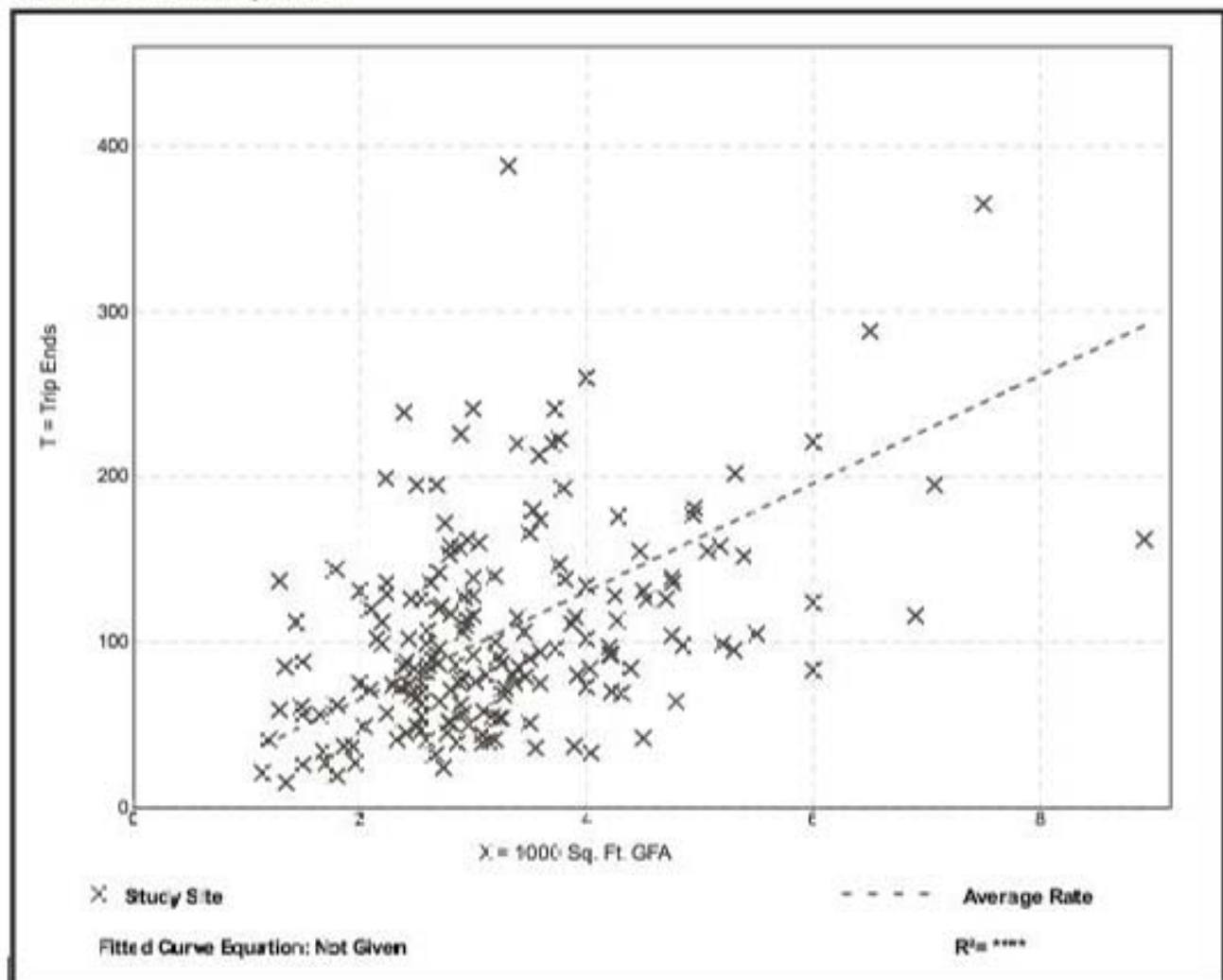
Fast-Food Restaurant with Drive-Through Window (934)

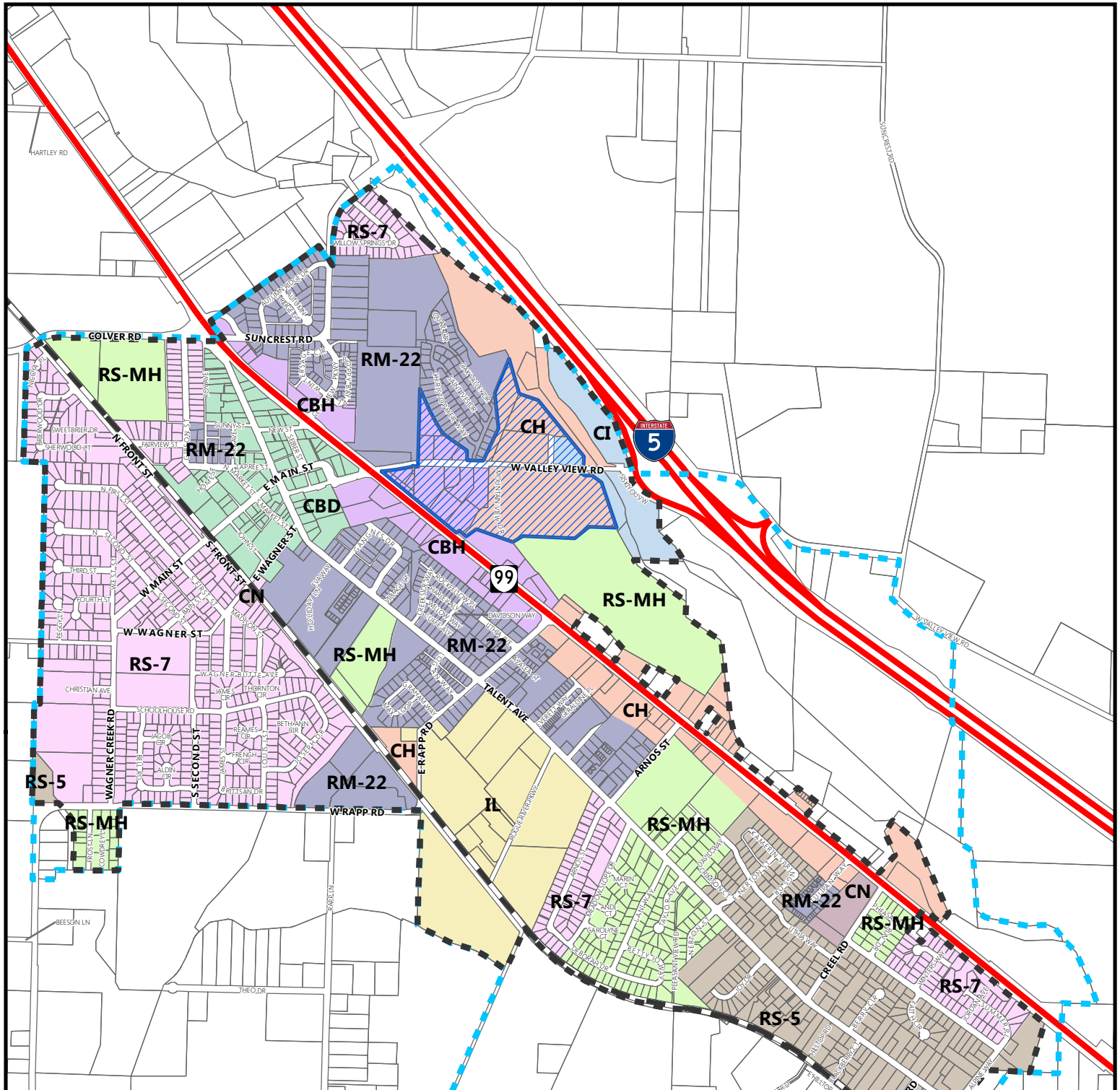
Vehicle Trip Ends vs: 1000 Sq. Ft. GFA
 On a: Weekday,
 Peak Hour of Adjacent Street Traffic,
 One Hour Between 4 and 6 p.m.
 Setting/Location: General Urban/Suburban
 Number of Studies: 185
 1000 Sq. Ft. GFA: 3
 Directional Distribution: 52% entering, 48% exiting

Vehicle Trip Generation per 1000 Sq. Ft. GFA

Average Rate	Range of Rates	Standard Deviation
32.67	8.17 - 117.22	17.87

Data Plot and Equation





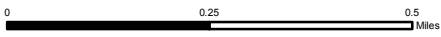
Zoning Map

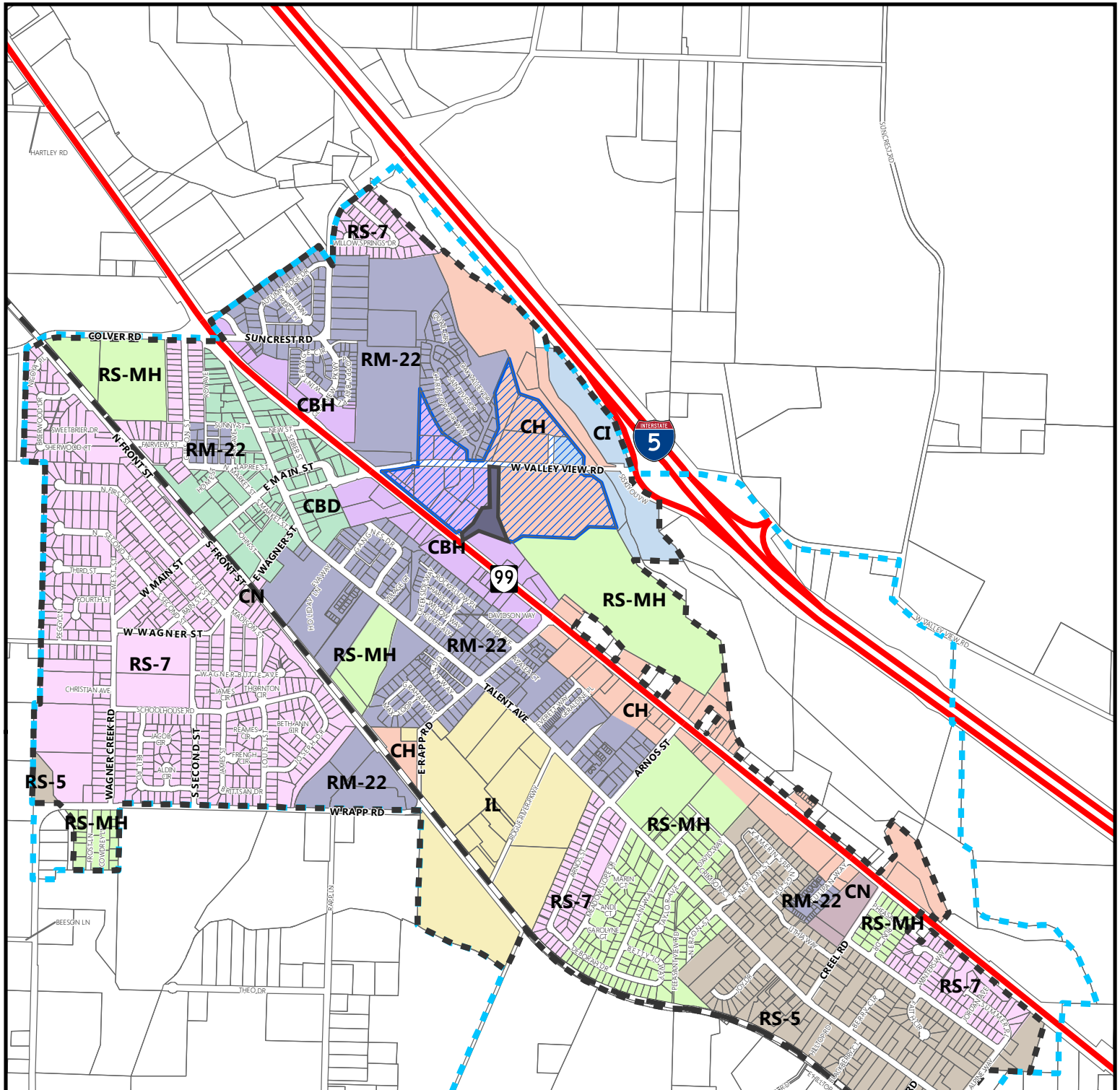
ADOPTED: 11/1/2006 by ORD 06-817-O
 AMENDED: 01/20/2016 by ORD 16-906-O
 EFFECTIVE: 02/19/2016

- | | | |
|-----------------------|---|--|
| Urban Growth Boundary | Central Business District (CBD) | Light Industrial (IL) |
| City Limits | Highway Central Business District (CBH) | Multiple Family - High Density (RM-22) |
| Driveup Overlay | Highway Commercial (CH) | Single Family - Low Density (RS-5) |
| Tax Lot | Interchange Commercial (CI) | Single Family - Medium Density (RS-7) |
| | Neighborhood Commercial (CN) | Single Family Manufactured Housing (RS-MH) |

Mapping is schematic only and bears no warranty of accuracy. This product was created for informational purposes and may not have been prepared for or be suitable for legal, engineering, surveying, or property investment purposes. All zoning information should be confirmed by the City prior to use for such purposes.

Plotted: 03/17/2017
 by: Jeff Wilcox





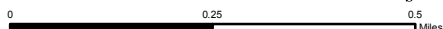
Zoning Map

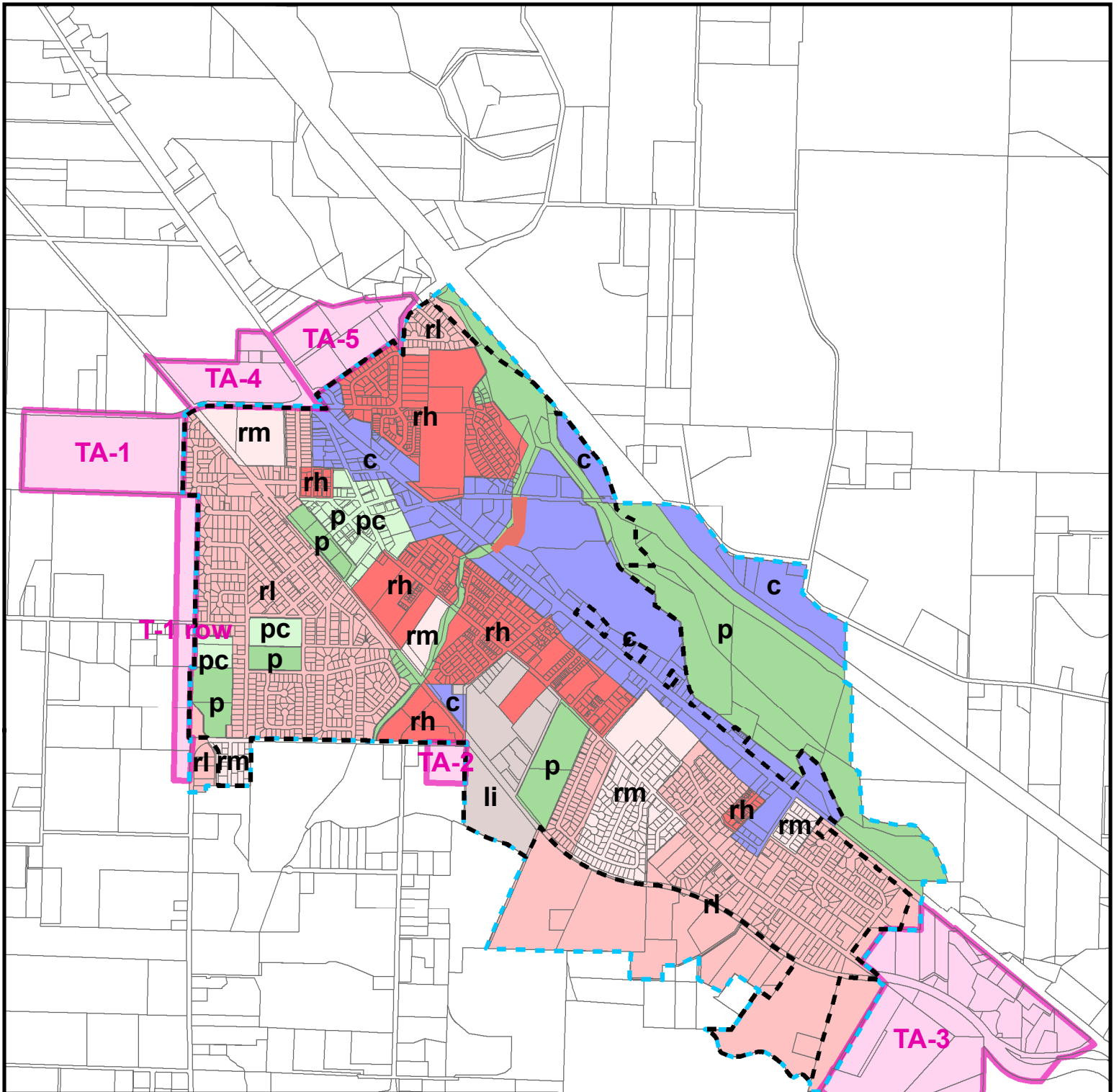
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Plotted: 03/17/2017
 by: Jeff Wilcox





Comprehensive Plan

ADOPTED: 06/24/1980 by ORD 417
 AMENDED: 05/03/2017 by ORD 17-933-O
 EFFECTIVE: 06/02/2017

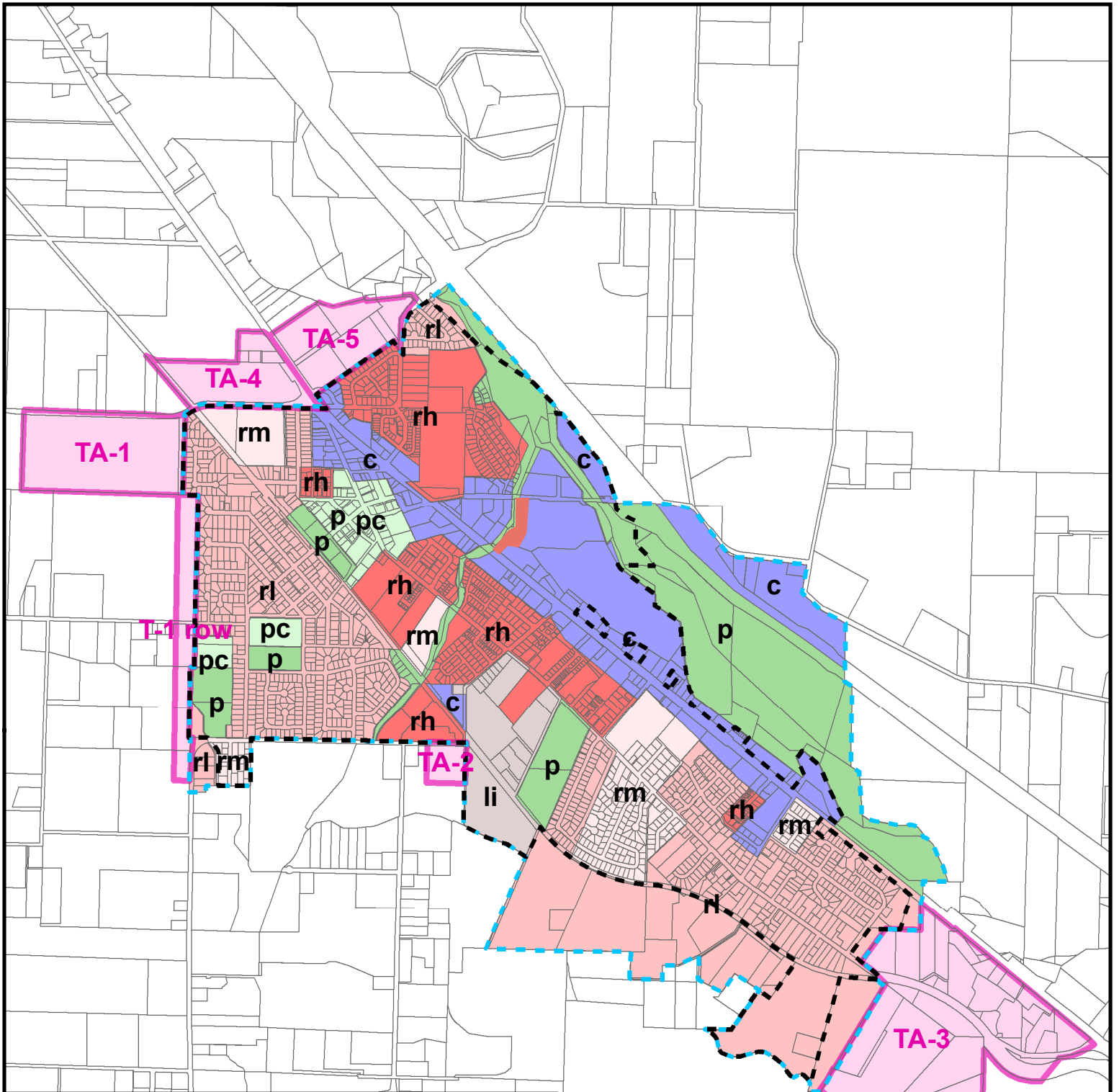
- | | |
|--------------------------------------|---------------------------------------|
| Urban Reserves (Future Growth Areas) | Comprehensive Plan Designation |
| Urban Growth Boundary | Commercial (c) |
| City Limits | Light Industrial (li) |
| Tax Lot | Parks (p) |
| | Public Facilities - Civic (pc) |
| | Residential High Density (rh) |
| | Residential Low Density (rl) |
| | Residential Manufactured Home (rm) |

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0 0.25 0.5 Miles

Plotted: 12/28/2016
 By: Jeff Wilson

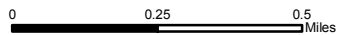


Comprehensive Plan

ADOPTED: 06/24/1980 by ORD 417
 AMENDED: 05/03/2017 by ORD 17-933-O
 EFFECTIVE: 06/02/2017

- | | |
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Plotted: 12/28/2016
 By: Jeff Wilson

SURVEY FOR:
WEST VALLEY VIEW, LLC
1175 E. MAIN ST., SUITE 2B
MEDFORD, OR 97504

SURVEY BY:
L.J. FRIAR & ASSOCIATES, P.C.
CONSULTING LAND SURVEYORS
PO BOX 1947
PHOENIX, OR 97535
PHONE: (541) 772-2782
LJFRIAR@ASSOCIATES.CHARTER.NET

DATE:
JUNE 3, 2020

TENTATIVE PLAT
FOR LAND PARTITION
Located in the SE 1/4 of Sec. 23, T.38S, R.1W, W.M.
City of Talent Jackson County, Oregon

COURSE DATA TABLE

NUM	DELTA	ARC	RADIUS	CHORD
C1	67°07'12"	39.83	34.00	N33°07'26"W 37.59
C2	61°43'54"	134.68	125.00	S30°25'47"E 128.26
C3	11°51'00"	91.83	444.00	N56°18'27"W 91.87

NUM	BEARING	DISTANCE	NUM	BEARING	DISTANCE
L1	N89°35'23"E	57.66	L8	N89°51'12"E	12.00
L2	N58°40'57"E	33.97	L9	S00°10'43"E	9.00
L3	N49°16'33"W	46.56	L10	N89°49'39"E	19.56
L4	S44°16'29"W	27.03	L11	S00°10'54"E	10.69
L5	N89°50'41"E	57.92	L12	N81°17'44"W	54.49
L6	N89°50'38"E	53.88	L13	S00°03'32"W	31.19
L7	S00°08'48"E	7.98			

LEGEND:

- ⊙ = FD. COUNTY SURVEYOR'S BRASS CAPPED MONUMENT PER {YEAR} RE-ESTAB'S.
- ⊙ = FD. 5/8" IRON PIN PER FS5688.
- ⊙ = FD. 5/8" IRON PIN & PLASTIC CAP MKD. THOMAS LS505 PER FS9088 OR 10992.
- ⊙ = FD. BRASS CAP MKD. L.J. FRIAR & ASSOC PER FS13205.
- ⊙ = FD. 5/8" IRON PIN & PLASTIC CAP MKD. TETSUKA ASSOC. INC. PER FS19863.
- ⊙ = FD. 5/8" IRON PIN & PLASTIC CAP MKD. OBEC LS85696 PER FS19706.
- ⊙ = FD. 1" BRASS DISC MKD. OBEC PER FS19706.
- ⊙ = FD. 5/8" IRON PIN & PLASTIC CAP MKD. L.J. FRIAR & ASSOC PER FS15012.
- ⊙ = FD. "X" ON CONCRETE WALL PER FS1701.
- = SET 5/8" X 24" IRON PIN & PLASTIC CAP MKD. L.J. FRIAR & ASSOC.

BASIS OF BEARINGS

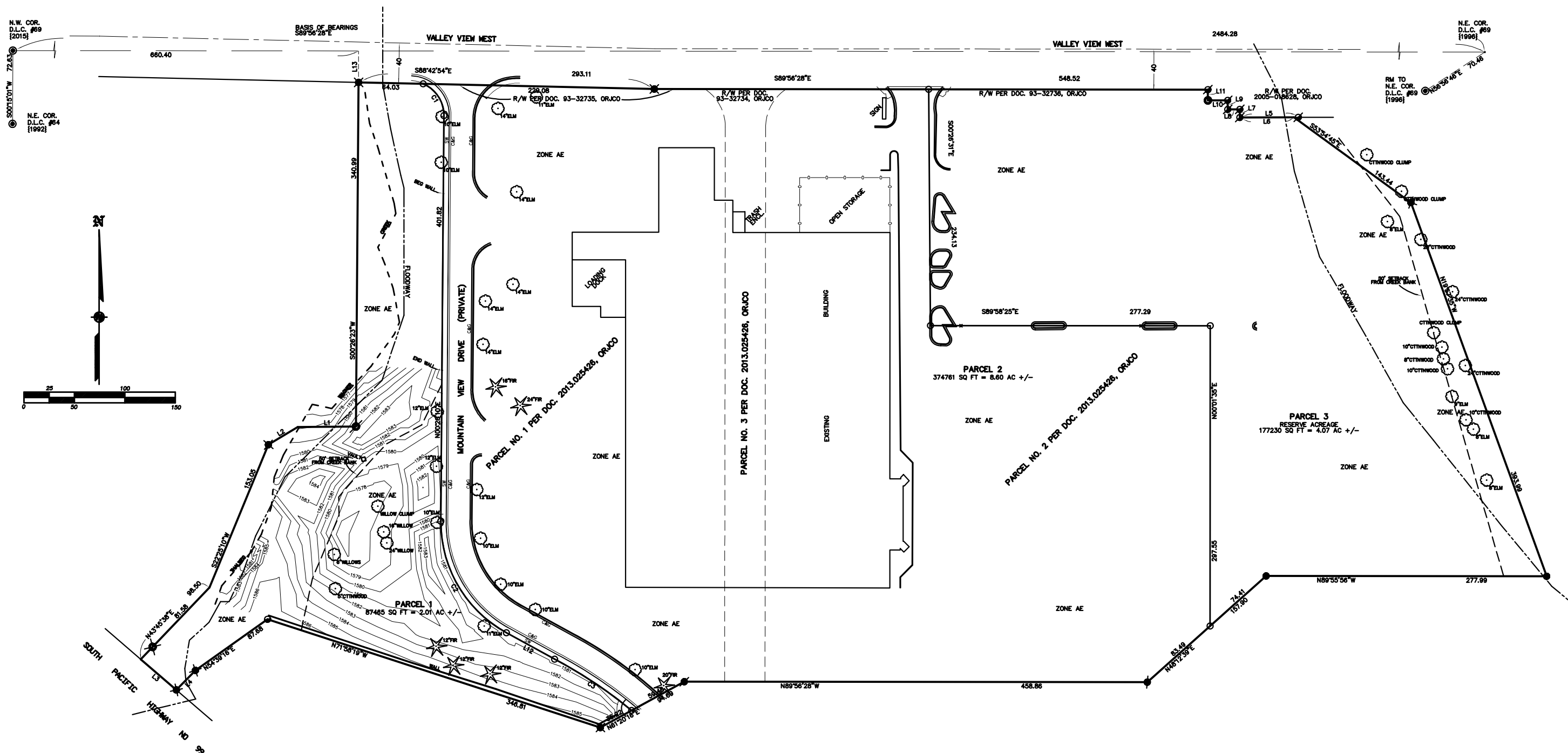
SURVEY NO 13205 AS SHOWN HEREON.

UNIT OF MEASUREMENT = FEET

SCALE: 1" = 50'

LEGEND:

- ORJCO = OFFICIAL RECORDS OF JACKSON COUNTY, OREGON.
- RM = REFERENCE MONUMENT.
- FS = FILED SURVEY #.
- APL = ADJUSTED PROPERTY LINE.
- OPL = OLD PROPERTY LINE.
- ATL = ADJUSTED TAX LOT #.
- L1/C1 = SEE COURSE DATA TABLE.



SURVEY FOR:
WEST VALLEY VIEW, LLC
1175 E. MAIN ST., SUITE 2B
MEDFORD, OR 97504

SURVEY BY:
L.J. FRIAR & ASSOCIATES, P.C.
CONSULTING LAND SURVEYORS
PO BOX 1947
PHOENIX, OR 97535
PHONE: (541) 772-2782
LJFRIARANDASSOCIATES@CHARTER.NET

DATE:
MAY 18, 2020

TENTATIVE PLAT
FOR LAND PARTITION
Located in the S.E. 1/4 of Sec. 23, T.38S., R.1W., W.M.
City of Talent Jackson County, Oregon

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BASIS OF BEARINGS:

SURVEY NO 13205 AS SHOWN HEREON.
UNIT OF MEASUREMENT = FEET

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APL = ADJUSTED PROPERTY LINE.
OPL = OLD PROPERTY LINE.
ATL = ADJUSTED TAX LOT #
L1/OT = SEE COURSE DATA TABLE.

SCALE: 1" = 50'

