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Appeal to the City Council of Central Point, Oregon

Regarding: Costco Store Conditional-Use Permit your file #15022

This appeal is pursuant to your Municipal Code Section 17.05.400(F)

Members of the Council,

I am submitting this appeal in an effort demonstrate to you that the City of Central Point Planning Dept. and Planning Commission have committed an error in their approval of the Conditional-Use Permit for the Costco Store to be located in the City of Central Point in the Table Rock Road Industrial Park. I have standing in that I spoke at the original hearing on January 6th, 2016 and appealed the decision to the Planning Commission subsequently.

It is easy to understand the city's desire to have such a vibrant retail store in your City. Costco is an amazing marketer of goods and services. They have a loyal customer base and provide terrific products to their customers. The City Planning Commission has abused their discretion in allowing such a use in the industrial zone and at this location.

In my previous appeal to the Planning Commission I discussed the impact of the traffic that Costco generates at any location. I demonstrated the traffic generated on a day to day basis is substantially more than is generated by the entire Rogue Valley Mall in Medford. This fact should be an occasion for pause and contemplation. You are required to follow the rules laid out in your Development Ordinance when approving such an application. It is interesting that in your STATEMENT OF VALUES regarding growth it is stated that "We value planned growth that will retain our small town atmosphere". This project does not fit that statement.

One of the issues is that the zone, that the store is to be located in, is Industrial. The areas all around the store are zoned industrial and much is heavy industrial. The reason that retail/commercial activities are allowed in those zones with restrictions, and not outright, and that they go through the Conditional-Use permit process is that they are not the primary use but an accessory use to the primary. It is the intent that these ancillary and non-primary uses are to allow for complimentary services and uses in the zone. These non-primary uses are allowed for convenience and efficiency. Uses such as restaurants and supply stores are allowed to keep people from leaving the general area to obtain needed services

When a store like Costco is placed in that zone you have to play, and indeed did so, a very significant semantic game with what you call the store. In calling it a warehouse store the project might just seem like a fit. With that said, it is certain that the management of Costco is under no illusions, whatsoever,

that they are the largest retailer in the area. As I previously stated, Costco generates more traffic than the Rogue Valley Mall and they are about one fifth of their building footprint. Just consider the number of parking spaces that they are illustrating in their plan. It is obvious that they don't fit in this zone. They are not the complimentary service and supply provider that is allowed in the zone. A store of this size and magnitude should not be in an industrial zone. If they are allowed to develop on this site it will become a traffic disaster.

The traffic issues have far reaching effects of congestion and cost on Central Point, Jackson County, and the City of Medford as well as the Oregon Department of Transportation. Of course, that means the tax payers who support those entities. In other words, all of us will be paying a huge price for the location of a store that is not an appropriate fit. It is not a code fit and it is not a size and traffic fit all in one. Once Costco goes in there will be no way to fix this problem.

The area of this store and the road servicing it are plan designated as a Freight Traffic Route. It currently experiences very heavy truck traffic and will experience more as the balance of the lands near and adjacent to the Costco site develop. It is unwise and dangerous to mix high volume heavy truck traffic with a daily vehicle traffic load approaching 11,000.

Traffic congestion around the Costco store will be a mix of heavy trucks and light vehicles. Table Rock Road will see the bulk of the traffic and the measures that have been suggested will only assist but not solve the problems related to this location. The additional traffic on Table Rock Road will soon find that it is not designed to handle the load further south of this store and people will soon move their preferred approach to Biddle Road and Table Rock Road north of the site. They will start using the freeway to enter Central Point from the North and the South. This will add congestion on the freeway off-ramps north and south and a loading on Pine Street all the way to the intersection with Hamrick and Pine and Table Rock Road and Pine/Biddle Road. Anyone who travels these roads now, knows that congestion in the morning and afternoon is already critical. Many people going to Costco do so on their way home. It will definitely be more of snarl than it already is.

The improvements required in the Traffic Impact Study indicate a resultant congestion from construction that is not to be completed for as much as two years. In reality, some of these items, such as an I-5 off-ramp improvement, are not scheduled by ODOT until 2023. There is no definitive evidence that the schedule has been modified. There are no engineering studies or drawings that would support a timely upgrade of that facility. There is no indication, other than verbal at the hearing of January 6th, 2016 that some concession might be made. There is no evidence that the improvements along Table Rock Road are funded or that the requisite eminent domain takings of additional land for widening and intersections have been done. There have been no bids advertised for and only estimates by the applicants traffic consultants. In fact, all of the items that should be in place for public safety and efficient road service are only ideas and suggestions at this point. It is possible that some may be completed within two years but at this point it is far from certain.

An additional issue that has not been fully vetted is the intersection of Biddle and Airport Road. This intersection is important as persons traveling to the airport are often on short time frames and congestion creates difficulties for them. Considering the fact that Table Rock Road to the south of the site will not be able to handle the traffic

The impact on all of these roads is significant and not easily solved if at all. The argument can be made that the costs for all of the improvements needed to place this major retailer in an industrial zone along Table Rock Road more than eclipses the cost of the store itself by a factor of five. Estimates for the widening of the freeway overpass on Table Rock Road exceed 20 million dollars. Further south of the overpass are single family residences that need to back out onto Table Rock Road to exit their properties. The estimate for acquiring these properties for road widening does not exist, but would be very high.

Table Rock Road is designated as a freight route in the overall traffic master plan and this enormous retailer with its accompanying vehicle traffic is not an appropriate mix with the truck traffic in that area. This traffic is well documented and I am certain that all of you are more than aware of the significant truck traffic that occurs on Table Rock Road to the North and South of this site and the truck traffic that enters and exits Central Point onto Pine Street from the Interstate 5. This type of traffic mix is difficult in small amounts that will always be present but to introduce vehicle traffic that is more than the Rogue Valley Mall to these roads even with the proposed improvements should give you pause. Vehicle and truck accidents will undoubtedly increase and serious injuries will occur when Costco's large number of senior drivers are forced to mix with large truck traffic. The intersection of Vilas Road and Crater Lake Highway has been the scene of horrendous accidents and many deaths and this location and traffic load creates at least four intersections with that type of potential.

It was not long ago that the City of Central Point decided to pass on a "big box" store proposed by Walmart in this general vicinity. In fact, Walmart's proposed site created fewer problems than this site. Some of the same reasons that are expressed here were used to discourage the development of the Walmart store. It should be noted that the super-sized Walmart does not generate anything close to the traffic that this Costco site will generate on a day to day / hour to hour basis. If it was not a fit for Walmart at a more appropriate site, then this location and store is certainly not a fit.

I am urging you to reconsider and overturn the decision of the Planning Commission on merit.

Thank you for your time.

Respectfully submitted this 16th day of February, 2016

A handwritten signature in black ink, appearing to read "L. Calvin Martin", written over a horizontal line.

L. Calvin Martin