

June 6, 2023

### Item Summary

Consideration of a Comprehensive Plan Map Amendment application from Employment Commercial (EC) to High Density Residential/Commercial for 1.62 acres in the Twin Creeks Transit Oriented Development (TOD) District. The subject property is located at the intersection of Twin Creeks Crossing and Boulder Ridge Street and is identified on the Jackson County Assessor's map as 37S 2W 03CA, Tax Lot 1500.

**Applicant:** Smith Crossing, LLC; **Agent:** Scott Sinner Consulting, Inc.

**Associated Files:** ZC-23002, MP-23001, SPAR-23001

### Staff Source

Justin Gindlesperger, Community Planner II

### Background

Smith Crossing, LLC ("Applicant") has requested a Minor Comprehensive Plan Map Amendment from Employment Commercial to High Density Residential in the Twin Creeks TOD District. It is the Applicant's intent to develop the property with a mixed-use development that includes 45 multifamily residential units including limited ground floor commercial uses along the Twin Creeks Crossing frontage and multifamily residential interior to the site. The proposed use is not consistent with the current zoning, which only permits residential units above ground floor commercial. The proposed Comprehensive Plan Map Amendment could permit mixed-use opportunities on the site, including vertical (mixed use in the same building) and horizontal (mixed use in adjacent buildings).

#### *Discussion:*

The City of Central Point uses a two (2) map system with the Comprehensive Plan Map and the Land Use Map. The Comprehensive Plan Map provides a broad view of development within the City; whereas, the Land Use Map, commonly referred to as the Zoning Map, represents the spatial distribution of all land uses and provides parcel specific information for development. Since the Comprehensive Plan Map and the Zoning Map to maintain consistency at all times, the application for comprehensive map amendment is accompanied by, and being processed concurrently with, an application for a Zone Map Amendment (see File No. ZC-23002) that proposes to change the zoning map to High Mix Residential (HMR) that is consistent with the proposed comprehensive plan map change to high density residential.

### *Comprehensive Plan Compliance*

The current Employment Commercial designation permits a broad range of commercial uses along with multifamily uses only when located above the ground floor commercial as part of vertical mixed uses. The proposed amendment maintains mixed-use opportunities on this site, including vertical (mixed use in the same building) and horizontal (mixed use in separate buildings on a site). Development of the site must maintain consistency with the Twin Creeks Master Plan for this area, and leasable commercial space in the mixed-use development will continue to provide opportunities for small businesses, retail and professional office uses.

### *Neighborhood Compatibility*

The subject property is currently undeveloped and adjacent to developed properties on the south and west within the High Density Residential/HMR and Medium Density/ Medium Mix Residential (MMR) zones. The proposed Comprehensive Plan Map Amendment extends the High Density Residential/HMR designation and will continue to provide mixed use opportunities along Twin Creeks Crossing, in accordance with the Twin Creeks Master Plan.

### *Traffic Impacts*

Transportation facilities in the area of the subject property were considered during the approval of the Twin Creeks Master Plan, which included analysis of transportation needs, traffic circulation and transit services. A Trip Generation Analysis, prepared by Southern Oregon Transportation Engineering dated April 17, 2023, evaluated the proposed zone change from EC to HMR and concluded the proposed map amendment will not generate additional impacts on transportation facilities.

## **Issues**

None.

## **Findings of Fact & Conclusions of Law**

The Central Point Station, Phase 2, Comprehensive Plan Map Amendment has been evaluated against the applicable criteria set forth in CPMC 17.96 and found to comply as evidenced in the Applicant's Restated Findings of Fact (Attachments "C"), the Planning Department Supplemental Findings (Attachment "D") and the Staff Report dated June 6, 2023.

## **Conditions of Approval**

None.

## **Attachments**

Attachment "A" – Project Location Map

Attachment "B" – Master Site Plan

Attachment "C" – Applicant's Restated Findings and Exhibits, dated 05/25/2023

Attachment "D" – Planning Department Supplemental Findings

Attachment “E” – Trip Generation Assessment, dated 04/17/2023

Attachment “F” – Resolution No. 905

### **Action**

Conduct the public hearing and consider the Comprehensive Plan Map Amendment application. The Planning Commission may 1) approve; 2) approve with revisions; or 3) deny the application.

If the Planning Commission finds there is insufficient evidence to take one of these actions at the June meeting, the Planning Commission may continue the public hearing to a date and time specific as necessary to allow the applicant to respond to any issues or questions and update their findings.

### **Recommendation**

Approve the Comprehensive Plan Map Amendment application, the Applicant’s Findings, as corrected, in Attachment “C” and the Planning Department Supplemental Findings in Attachment “D.”





# CENTRAL POINT STATION PHASE 2

37000064, Year List 1500  
1.71 Half acre pending approval of Voucher



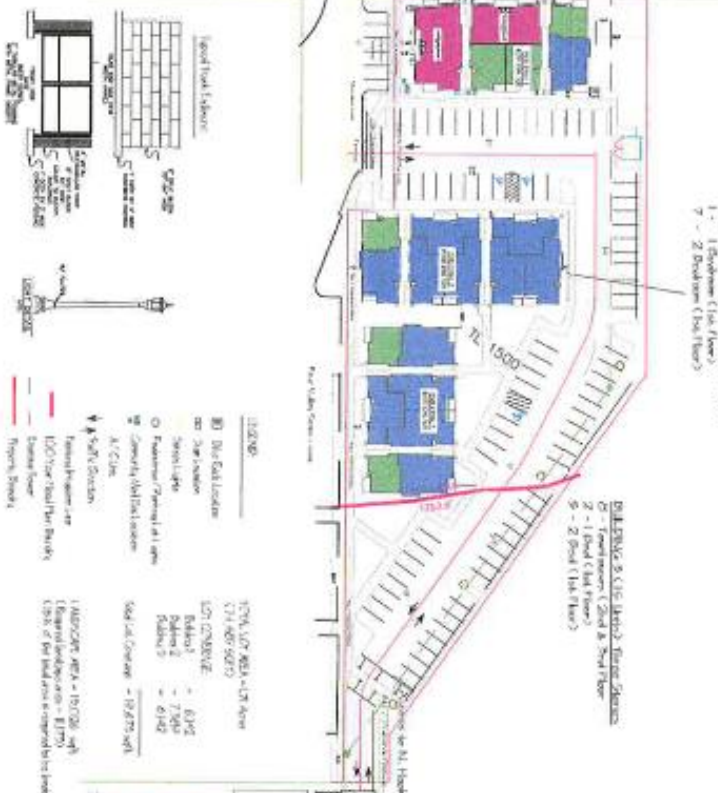
**OWNER**  
 P.M.C.I. Inc.  
 1800 N. 11th St.  
 Suite 100  
 Charlotte, NC 28207  
 704.399.8888

**DESIGNER**  
 M. C. MORGAN & ASSOCIATES  
 1415 Park Street  
 Charlotte, NC 28207  
 704.399.8888

**BUILDING 2 (1st/2nd/3rd Three Stories)**  
 10 - 1st Floor (1st Floor)  
 1 - 1st Floor (1st Floor)  
 7 - 2nd Floor (2nd Floor)

**BUILDING 1 (1st/2nd/3rd Three Stories)**  
 9 - 1st Floor (1st Floor)  
 2 - 1st Floor (1st Floor)  
 0 - 2nd Floor (2nd Floor)

**BUILDING 3 (1st/2nd/3rd Three Stories)**  
 2 - 1st Floor (1st Floor)  
 0 - 2nd Floor (2nd Floor)



### LEGEND

- B Det. Bal. Locker
- DP Det. Locker
- S Signage
- P Pedestrian Ramp/Walkway
- C Canopy/Walkway
- A.C. (A) Accessory Construction
- T Temporary Structure
- L Light Pole
- V Vehicle



### LEGEND CONTINUED

- 12 - 2ND FLOOR 11/250H
- 1ST FLOOR
- 4-11 1ST FLOOR
- 1ST FLOOR
- 1ST FLOOR
- 12 - 1ST FLOOR 21/250H CHANGERS
- 1ST FLOOR 31/250H CHANGERS
- 1ST FLOOR 21/250H CHANGERS
- SCORE AD-MENS-CONC.

- 45 - TOTAL LIVING UNITS
- 62 - TOTAL PARKING SPACES
- 12 - 2ND FLOOR 11/250H
- 2 - 1ST FLOOR 21/250H
- 1 - 1ST FLOOR 31/250H
- 17 - 1ST FLOOR 21/250H
- 3 - 1ST FLOOR 11/250H
- 92 - TOTAL PARKING SPACES

### NOTES

- 1. ALL NOTES ARE TO BE READ IN ORDER OF PRECEDENCE.
- 2. ANY CHANGES TO THIS PLAN MUST BE APPROVED BY THE ARCHITECT.
- 3. ALL CONSTRUCTION SHALL BE IN ACCORDANCE WITH ALL APPLICABLE CODES AND REGULATIONS.

<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th style="font-size: small;">NO.</th> <th style="font-size: small;">REVISION</th> </tr> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> </table>	NO.	REVISION							<b>CENTRAL POINT STATION PHASE 2</b>	<b>P.M.C.I. INC.</b> <small>1800 N. 11th St.        Suite 100        Charlotte, NC 28207        704.399.8888</small>	<b>SITE PLAN</b>
NO.	REVISION										

**BEFORE THE CITY COUNCIL OF THE CITY OF CENTRAL POINT OREGON:**

Corrected: 05/25/2023

<b>IN THE MATTER OF AN APPLICATION FOR A</b>	)	
<b>MINOR COMPREHENSIVE PLAN MAP AMENDMENT</b>	)	<b>FINDINGS OF FACT</b>
<b>T37-R2W-03CA TL 1500</b>	)	<b>AND</b>
<b>SMITH CROSSING LLC APPLICANT</b>	)	<b>CONCLUSIONS</b>
<b><u>SCOTT SINNER CONSULTING, INC. AGENT</u></b>	)	<b>OF LAW</b>

**I. BACKGROUND INFORMATION**

**Applicant:**

Smith Crossing LLC  
 353 Dalton St  
 Medford, OR 97501  
 Milo Smith milosmith@gmial.com  
 Philip Smith Philips.pmci@yahoo.com

**Agent:**

Scott Sinner Consulting, Inc.  
 4401 San Juan Dr. Suite G  
 Medford, OR 97504  
 541-601-0917  
scottsinner@yahoo.com

**Property:**

37 2W 03CA TL 1500  
 Smith Crossing LLC  
 Twin Creeks Crossing and Boulder Ridge Street  
 Central Point OR 97502  
 1.62 Acres Net Acreage

Existing zoning Employment Commercial (EC)  
 Proposed Zoning HMR High Mix Residential Commercial (TOD)

**Project Summary:**

This application is requesting a minor comprehensive plan map amendment to change the General Land Use Plan (GLUP) Map from Employment Commercial (EC) TOD to the High-Density designation.

This application is submitted with an application for a Zoning Map amendment to change the zoning district from the current Employment Commercial (EC) Transit Oriented District (TOD) to the High Mix Residential / Commercial (HMR) TOD zoning district.

The final application submitted for the subject property is a Site Plan review application for a 45-unit multifamily development which includes 2,511 square feet of ground floor Twin Creeks Crossing Street frontage commercial lease space.

The project location is identified below:



Figure 1 Project Location

Findings of Fact:

Central Point Municipal Code (CPMC) Table 17.05.1 identifies the procedural type and approving authority for a Minor Comprehensive Plan Map Amendment as a Type III application with the City Council being the approval authority.

**TABLE 17.05.1**

<b>LAND DEVELOPMENT PERMIT*</b>	<b>PROCEDURAL TYPE</b>	<b>APPLICABLE REGULATIONS</b>	<b>APPROVING AUTHORITY</b>	<b>120-DAY RULE</b>
<b>Comprehensive Plan &amp; UGB Amendments</b>				
<b>Major</b>	Type IV	Chapter <u>17.96</u>	City Council	No
<b>Minor</b>	Type III	Chapter <u>17.96</u>	City Council	No

CPMC title 17.10.300 provides the definitions for Major and Minor amendments:

*17.10.300 Major and minor amendments.*

*There are two types of map and text amendments:*

*A. Major Amendments. Major amendments are legislative policy decisions that establish by law general policies and regulations for future land use decisions, such as revisions to the zoning and land division ordinance that have widespread and significant impact beyond the immediate area. Major amendments are reviewed using the Type IV procedure in Section 17.05.500.*

*B. Minor Amendments. Minor amendments are those that involve the application of adopted policy to a specific development application, and not the adoption of new policy (i.e., major amendments). Minor amendments shall follow the Type III procedure, as set forth in Section 17.05.400. The approval authority shall be the city council after review and recommendation by the planning commission. (Ord. 1989 §1(part), 2014; Ord. 1874 §3(part), 2006).*

This application is specific to a single tax lot and will not have a widespread impact beyond the immediate area.

Conclusions of Law:

The City Council can conclude the proposed Comprehensive Plan Map Amendment is a Minor Amendment and shall be processed as a Type III procedure.



Approval Criteria:

*17.96.500 Approval criteria.*

*A recommendation or a decision to approve or to deny an application for an amendment to the comprehensive plan, or urban growth boundary shall be based on written findings and conclusions that address the following criteria:*

*A. Approval of the request is consistent with the applicable statewide planning goals;*

*B. Approval of the request is consistent with the Central Point comprehensive plan;*

*C. For urban growth boundary amendments findings demonstrate that adequate public services and transportation networks to serve the property are either available, or identified for construction in the city's public facilities master plans (major and minor amendments); and*

*D. The amendment complies with OAR 660-012-0060 of the Transportation Planning Rule. (Ord. 1989 §1(part), 2014; Ord. 1436 §2(part), 19B1. Formerly 17.96.050).*

Findings of Fact:

*A. Approval of the request is consistent with the applicable statewide planning goals;*

The Statewide Planning Goals are identified below. Not all goals are applicable to this request for a minor comprehensive plan map amendment.

*Goal 1 Citizen Involvement*

*Goal 2 Land Use Planning*

*Goal 3 Agricultural Lands*

*Goal 4 Forest Lands*

*Goal 5 Natural Resources, Scenic and Historic Areas, and Open Spaces*

*Goal 6 Air, Water and Land Resources Quality*

*Goal 7 Areas Subject to Natural Hazards*

*Goal B Recreational Needs*

- Goal 9 Economic Development
- Goal 10 Housing
- Goal 11 Public Facilities and Services
- Goal 12 Transportation
- Goal 13 Energy Conservation
- Goal 14 Urbanization
- Goal 15 Willamette River Greenway
- Goal 16 Estuarine Resources
- Goal 17 Coastal Shorelands
- Goal 18 Beaches and Dunes
- Goal 19 Ocean Resources

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Goal 1 Citizen Involvement

*Public involvement is a required part of land use planning in Oregon. This requirement is one of the things that make Oregon's land use planning program unique. The requirement for public participation is written in the first goal of nineteen in the statewide land use planning system.*

Findings of Fact:

The Central Point Municipal Code has been adopted by the City and acknowledged by the State of Oregon.

CPMC Title 17 provides the procedures for the requested land use action, including the noticing requirements for the application to assure the Citizens within the area affected are made aware of the application.

The Code also requires a public hearing to provide the public with an opportunity to provide comments to the approving authority.

Acknowledgement by the State of the City's review procedures for land use actions confirm consistency with Statewide Planning Goal 1 Citizen Involvement.

Conclusions of Law:

The City Council can conclude the application is consistent with Statewide Planning Goal 1, Citizen involvement.

*Goal 2 Land Use Planning*

*Goal 2 requires each local government in Oregon to have and follow a comprehensive land use plan and implementing regulations. Cities and counties must build their comprehensive plans on a factual base and follow their plan when making decisions on appropriate zoning. City and county plans must be consistent with one another.*

Findings of Fact:

The City of Central Point has a Comprehensive Plan, a Municipal Code, General Land Use Plan Map, Zoning Map, and a Transportation System Plan. All plans have been acknowledged by the State to assure compliance with all Statewide Planning Goals.

This application for a minor Comprehensive Plan Map Amendment has been developed to meet all applicable code standards and submittal requirements identified in the CPMC.

The City will process the application per the requirements of the Code consistent with Statewide Planning Goal 2.

Conclusions of Law:

The City Council can conclude the City application and review process is consistent with Statewide Planning Goal 2 for Land Use Planning.

*Goal 3 Agricultural Lands*

*Agriculture has had a big influence in Oregon, as farming is what attracted many of Oregon's first settlers. Agriculture continues to be a major employer in the state. Goal 3 protects farmland for continued production of food and fiber.*

Findings of Fact:

The subject property is within the Central Point Urban Growth Boundary and is not adjacent to any lands within any agricultural zoning districts or lands in agricultural production uses.

The approval of the requested comprehensive plan map amendment will have no impact on any agricultural lands or agricultural uses.

Conclusions of Law:

The City Council can conclude the proposed application is consistent with Statewide Planning Goal 3 and the approval of the requested Minor Comprehensive Plan Map amendment will protect farmland.

*Goal 4 Forest Lands*

*Goal 4 protects working forest land around the state, preserving it for commercial forestry while recognizing its value for fish and wildlife habitat, recreation, and protection of air and water quality.*

Findings of Fact:

The subject property is within the Central Point Urban Growth Boundary and is not adjacent to any lands within any forest zoning districts or lands in forest production uses.

The approval of the requested comprehensive plan map amendment will have no impact on any forest lands or forest uses.

Conclusions of Law:

The City Council can conclude the proposed application is consistent with Statewide Planning Goal 4 and the approval of the requested Minor Comprehensive Map Amendment will protect forestland.

*Goal 5 Natural Resources, Scenic and Historic Areas, and Open Spaces*

*Goal 5 is a broad statewide planning goal that covers more than a dozen resources. The resources range from wildlife habitat to historic places, and gravel mines. To protect and plan for them, local governments are asked to create a number of inventories.*

Findings of Fact:

~~The subject property is not near any Goal 5 resources on State of Federal inventories.~~

The property abuts an open space identified in the City's Twin Creek Master Plan. This open space is also a portion of the Plan's regional storm water management system, and the development of the property will not have an impact on the function of the system.

The site is not near any natural resource, scenic, or historic areas.

Conclusions of Law:

~~The City Council can conclude the requested Minor Comprehensive Plan Map Amendment will not impact any Goal 5 resources.~~

**Staff Comment:** The subject property is within the Special Flood Hazard Area of Griffin Creek. Proposed development on the property will be subject to applicable policies, actions and standards in the Central Point Municipal Code.

*Goal 6 Air, Water and Land Resources Quality*

*Goal 6 instructs local governments to consider protection of air, water and land resources from pollution and pollutants when developing comprehensive plans. The pollutants addressed in Goal 6 include solid waste, water waste, noise and thermal pollution, air pollution, and industry-related contaminants.*

Findings of Fact:

The subject property is within the Jackson County Air Quality Maintenance Area (AQMA) which governs air quality issues at the County level.

Development on the site will be subject to an Oregon State Department of Environmental Quality (DEQ) 1200 C permit for stormwater runoff from land and impervious areas such as paved streets, parking lots, and building rooftops during rainfall and snow events.

The City, County, and State have regulations in place to assure compliance with Goal 6 resources.

Conclusions of Law:

~~The City Council can conclude the City complies with regulations to manage air, water, and land impacts during and post development.~~

Staff Comment: Review is for compliance of application to Statewide Planning Goals. The proposed amendment is not expected to have impacts on state and federal regulations on air, water and land quality.

*Goal 7 Areas Subject to Natural Hazards*

*Goal 7 requires local comprehensive plans to address Oregon's natural hazards. Protecting people and property from natural hazards requires knowledge, planning, coordination, and education.*

Findings of Fact:

The subject property is adjacent to a regional stormwater facility for the Twin Creeks area and is within an area that has an approved Federal Emergency Management Agency (FEMA) Letter of Map Revision (LOMR) to determine 100-year flood zone in the vicinity.

Future development will be designed to avoid mapped flood zones.

The site does not contain any other natural hazards identified in Goal 7.

Conclusions of Law:

The City Council can conclude the ~~City~~<sup>amendment</sup> complies with Goal 7 mapping of natural hazard area to assure development minimizes risks of hazards.

Staff Comment: The property is within the SFHA of Griffin Creek and is subject to standards in CPMC to minimize flood losses and protect the property from the dangers of flooding.

*Goal 8 Recreational Needs*



*Goal 8 requires local governments to plan for the recreation needs of their residents and visitors. The goal places priority on non-motorized forms of recreation, and recreation areas that serve high-density populations with limited transportation options and limited financial resources. It also places priority on recreation areas that are free or available at a low cost to the public.*

Findings of Fact:

The subject property is within the Twin Creeks Master Plan area which provides local residents with multiple opportunities for outdoor recreation including active and passive public parks and a network of walking paths connecting the residential, commercial and recreational uses of the community.

Conclusions of Law:

The City Council can conclude the City has provided opportunities for the recreational needs of residents in the area

*Goal 9 Economic Development*

*The purpose of Goal 9 planning is to make sure cities and counties have enough land available to realize economic growth and development opportunities.*

Findings of Fact:

Goal 9 is intended to assure cities have an adequate supply of land for employment purposes for commercial and industrial land uses. To determine the supply of employment lands, a city must consider buildable lands inventory for all uses.

The Economic Element of the Central Point Comprehensive Plan was updated in 2019 and analyzed the available and needed employment lands for both short term and long term needs as well as the most suitable industry sectors for the City.

The Sectors identified in the Economic Element most suitable for the City were Truck Transportation, Specialty Food Products Manufacturing, and Retail trade.

The subject property is currently designated as Employment Commercial intended for retail, professional offices, and higher density housing with ground floor commercial uses. The site is not appropriate for truck transportation and specialty food products manufacturing.

The proposed designation of High Density with HMR zoning would allow multifamily housing with mixed use commercial on ground floor street frontages. A site plan is submitted with this application that proposes 45 multifamily dwelling units with 2,514 square feet of commercial lease space ground floor street frontage.

The Economic Element of the Comprehensive Plan identifies a need for additional commercial space in the City. Since the applications submitted with this development are

comparable with the permitted uses in the EC designation and zoning district and will have negligible effects on the supply of commercial lands available in the City.

Conclusions of Law:

The City Council can conclude the requested Minor Comprehensive Plan Map Amendment will not have a significant impact on employment lands in the City.

**Staff Comment:** By providing ground floor commercial areas along Boulder Ridge and Twin Creeks Crossing, the proposed amendment is consistent with Goal 9 and the City's commercial land needs.

*Goal 10 Housing*

*Goal 10 planning, at a local level, asks that cities inventory their "buildable lands", this refers to land inside an urban growth boundary that is suitable and available for residential use.*

Findings of Fact:

~~The City has a buildable lands inventory within the Housing Element of the Comprehensive Plan.~~

~~The buildable lands inventory identifies the City has a need for approximately 410 acres of residential lands to meet the housing needs for the projected population in the 20-year planning horizon.~~

~~Additionally, the buildable lands inventory identifies the City will not meet its 6.9 dwelling units per acre density requirements for housing within the UGB at current residential land use and density pattern.~~

The requested map amendment from EC to the High Density residential and HMR zoning district will provide a site for residential development at the City's highest density where all urban services are available and in adequate supply.

Conclusions of Law:

The City Council can conclude the requested Minor Comprehensive Plan Map Amendment is consistent with the housing needs established in the Buildable Lands Inventory for high density housing in the City.

**Staff Comment:** The proposed amendment provides mixed use opportunities and continues to provide multifamily uses, which is consistent with the City's need to provide housing and Goal 10.

*Goal 11 Public Facilities and Services*

*Each city with a population greater than 2,500 is required to create public facilities plan that meets its current and long-range needs.*

Findings of Fact:

The subject property is located in the Twin Creeks TOD, a master planned community where all Category A facilities are currently installed with adequate capacity for the requested map amendment.

Conclusions of Law:

The City Council can conclude the public facilities are adequate for the requested Minor Comprehensive Plan Map Amendment.

*Goal 12 Transportation*

*Goal 12 requires cities, counties and the state to create a transportation system plan that takes into account all relevant modes of transportation: mass transit, air, water, rail, highway, bicycle and pedestrian.*

Findings of Fact:

The City of Central Point has an adopted Transportation System Plan. The subject property is within the Twin Creeks TOD. This is a master planned area, when approved, a traffic impact analysis was used for the entire TOD.

The change from the Employment Commercial designation to the High-Density Residential designation will result in less intensive uses than the permitted uses in the High Density Residential zone.

~~The Oregon Transportation Planning Rule requires a jurisdiction considers all modes of transportation in a land use decision. A review of this property determines water and rail transportation are not available.~~

~~The subject property is 3 miles from the Rogue Valley International Airport, and 1.5 miles from Interstate Highway 5 (I-5). The subject property has frontage on Twin Creeks Crossing, classified as a minor arterial street in the Central Point Transportation System Plan (TSP).~~

~~The nearest Rogue Valley Transit District (RVTD) route is Route 40 with a bus stop are located on approximately .5 miles from the site.~~

Twin Creeks Crossing is a minor arterial street with a center median and divided travel lanes. The frontage of the subject property is improved with curb, gutter and a curb tight 12 foot wide sidewalk.

The site is within the Twin Creeks TOD which has a priority for multimodal transportation opportunities specifically bicycle and pedestrian travel.

The standards are consistent with the adopted and acknowledged Central Point Transportation System Plan, therefore also consistent with the Oregon Transportation Planning Rule.

The subject property is within an adopted circulation plans area.

A Transportation analysis prepared by Southern Oregon Traffic Engineers has been submitted with these findings demonstrating facility adequacy and compliance with the Oregon Transportation Planning Rule.

Conclusions of Law:

The City Council can conclude The City has an adopted Transportation System Plan that includes all forms of transportation.

The transportation facilities for the current EC GLUP designation are adequate at the site and the requested Comprehensive Plan Map Amendment to High Density Residential is less intensive than the existing designation. The transportation facilities are adequate for the request.

*Goal 13 Energy Conservation*

*Goal 13 requires local governments to consider the effects of its comprehensive planning decision on energy consumption.*

Findings of Fact:

The City has adopted Comprehensive Plan elements and Land Development code requirements addressing energy conservation for new developments.

The Land Development Code has provisions for building orientation to attempt to optimize the siting of buildings for energy conservation and the State also has a progressive energy code to assure developments are constructed in an energy efficient manner.

Conclusions of Law:

~~The City Council can conclude the City has considered the effects of Energy Conservation with the requested Comprehensive Plan Map Amendment.~~

Staff Comment: The proposed amendment and subsequent development of the property are not expected to increase energy utilization.

*Goal 14 Urbanization*

*Comprehensive land use planning in Oregon is most well-known for its use of the "urban growth boundary" or UGB. The UGB is used to contain urban development, but also as a tool to plan for orderly growth.*

Findings of Fact:

Staff Comment: Goal 14 is focused on managing the City's growth and efficient use of land. The subject property is within the Twin Creeks Master Plan area, which considered development of the subject property to urban development standards and previously considered within the City's land needs.

~~The City has an Urban Growth Boundary acknowledged by the State. Within the UGB, the City, has a General Land Use Plan Map and a Zoning Map to plan for all uses within the UGB.~~

~~The City Comprehensive Plan contains elements for Housing, employment and recreational needs for the City and the Code is designed to implement the Goals and Policies of the Comprehensive Plan.~~

Conclusions of Law:

~~The City Council can conclude the City has an acknowledged UGB, and Comprehensive Plan, and Municipal Code provide a tool for orderly growth within the City.~~

Goal 15 Willamette River Greenway

Goal 15 is not applicable to this application.

Goal 16 Estuarine Resources

Goal 16 is not applicable to this application.

Goal 17 Coastal Shorelands

Goal 17 is not applicable to this application.

Goal 18 Beaches and Dunes

Goal 18 is not applicable to this application.

Goal 19 Ocean Resources

Goal 19 is not applicable to this application.

Conclusions of Law:

The City Council can conclude the requested Minor Comprehensive Plan Map Amendment is consistent with all applicable Statewide Planning Goals.

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*B. Approval of the request is consistent with the Central Point comprehensive plan;*

- 1-Preface (1980)*
- 2 - Introduction (1980)*
- 3 - Population Element (2019)*
- 4 - Regional Plan Element (2012)*
- 5 - Planning Area Characteristics (1980)*
- 6 - Urbanization Element (2019)*
- 7 - Plan Summary (1983)*
- 8 - Housing Element (2019)*
- 9 - Environmental Management Element (1983)*
- 10 - Parks Element (2018)*
- 11-Public Facilities and Services Element (1983)*
- 12 - Economic Element (2019)*
- 13 - Energy Utilization Element (1983)*
- 14- Transportation Element (2008)*
- 15 - Land Use Element (2018)*
- Comprehensive Plan Land Use Map*

*3 - Population Element*

*The purpose of the Population Element is to track the historic characteristics and growth of the City's population, and based on that information develop a 20-year forecast of the population. Based on the 20-year population forecast the City can plan for land and urban service needs to accommodate the population growth.*

Findings of Fact:

The Population Element tracks population growth, demographic and trends that aid in administering growth within the City.

The proposed Comprehensive Plan Map Amendment will have minimal impact on the City's ability to collect and analyze Population data.

Conclusions of Law:

The City Council can conclude the requested Minor Comprehensive Plan Map Amendment is consistent with the Population Element of the Comprehensive Plan.

*4 - Regional Plan Element*

Findings of Fact:

The Regional Plan Element established requirements for the City's Urban Reserve.

The impacts of the proposed Comprehensive Plan Map Amendment are minimal. The approval would result in a shift 1.7 acres of employment land to high density residential land.

~~The City has a need for both land uses, however the actual difference in permitted uses for developments between the EC zoning and the HMR/TOD zoning is negligible. Both zoning districts allow mixed use for high density residential development with ground floor commercial uses.~~

**Staff Comment:** By providing ground floor commercial uses along Boulder Ridge and Twin Creeks Crossing, the amendment is consistent with the City's commercial land needs.

Conclusions of Law:

The City Council can conclude the requested Minor Comprehensive Plan Map Amendment will not have a significant impact to the Regional Plan Element of the Comprehensive Plan.

*5 - Planning Area Characteristics (1980)*

Findings of Fact:

The Planning Area Characteristics Element of the Comprehensive Plan addresses Statewide Planning Goal 2, Land Use Planning. The Element identifies existing development patterns, population, natural features and resources, transportations systems, and residential, commercial, industrial development.

The identification and analysis of existing conditions, facilities and trends allow for more informed development. While this Element was last updated in 1980, it provided a

foundation for other elements in the Comprehensive Plan that have been updated to reflect current needs.

The requested Minor Comprehensive Plan Map Amendment will have minimal impact on the Planning Area Characteristics as this element is primarily use as background for other elements of the Comprehensive Plan.

Conclusions of Law:

The City Council can conclude the requested Minor Comprehensive Plan Map Amendment is consistent with the Planning Area Characteristics Element of the Comprehensive Pan.

*6 - Urbanization Element (2019)*

Findings of Fact:

The City has an Urban Growth Boundary acknowledged by the State. Within the UGB, the City, has a General Land Use Plan Map and a Zoning Map to plan for all uses within the UGB.

The purpose of the Urbanization Element in the Comprehensive Plan is to *"provide for an orderly and efficient transition from rural to urban land use, to accommodate urban population and urban employment inside urban growth boundaries, to insure efficient use of land, and to provide for livable communities."*

The subject property is infill development within the Twin Creeks TOD area. All urban facilities are currently at the property with sufficient capacity to serve the proposed minor Comprehensive Plan Map Amendment from Employment Commercial to High Density.

The development applications submitted with this minor Comprehensive Plan Map Amendment proposes a mixed-use development with commercial and multifamily components that is very similar to the allowed uses of the EC zoning district.

Conclusions of Law:

The City Council can conclude the requested Minor Comprehensive Plan Map Amendment will not have a significant impact to the Urbanization Element of the Comprehensive Plan.

## *8-Housing Element (2019)*

### Findings of Fact:

~~The City has a buildable lands inventory within the Housing Element of the Comprehensive Plan.~~

~~The buildable lands inventory identifies the City has a need for approximately 410 acres of residential lands to meet the housing needs for the projected population in the 20-year planning horizon.~~

~~Additionally, the buildable lands inventory identifies the City will not meet its 6.9 dwelling units per acre density requirements for housing within the UGB at current residential land use and density pattern.~~

The requested map amendment from EC designation to the High Density residential and HMR/TOD zoning district will provide a site for residential development at the City's highest density where all urban services are available and in adequate supply.

### Conclusions of Law:

The City Council can conclude the requested Comprehensive Plan Map Amendment is consistent with the housing needs ~~established in the Buildable Lands Inventory for high density housing in the City.~~

## *9 - Environmental Management Element (1983)*

### Findings of Fact:

The subject property is within the Jackson County Air Quality Maintenance Area (AQMA) which governs air quality issues at the County level.

Development on the site will be subject to an Oregon State Department of Environmental Quality (DEQ) 1200 C permit for stormwater runoff from land and impervious areas such as paved streets, parking lots, and building rooftops during rainfall and snow events.

The subject property is adjacent to a regional stormwater facility for the Twin Creeks area and is within an area that has an approved Federal Emergency Management Agency (FEMA) Letter of Map Revision (LOMR) to determine 100-year flood zone in the vicinity.

Future development will be designed to avoid mapped flood zones.

### Conclusions of Law:

The City Council can conclude the City complies with regulations to manage air, water, and land impacts during and post development.

### *10- Parks Element (2018)*

#### Findings of Fact:

The subject is within the Twin Creeks TOD. A primary objective of the TOD is to provide recreational opportunities intergraded into plan areas.

The Twin Creeks area includes a series of open spaces for passive and active recreation areas as well as a planned series of walking trails throughout the development.

The requested Minor Comprehensive Plan Map Amendment is 1.7 acres of infill development and the future development of the site will include the development of a final segment of the pedestrian path on the south east portion of the Twin Creeks TOD.

#### Conclusions of Law:

The City Council can conclude the requested Comprehensive Plan Map Amendment is consistent with the Parks Element of the Comprehensive Plan.

### *11- Public Facilities and Services Element (1983)*

#### Findings of Fact:

The subject property is located within the Twin Creeks TOD area. The site is currently vacant, with all urban facilities including streets, water stormwater and sewer are currently developed and available for the direct connections of the future development.

#### Conclusions of Law:

The City Council can conclude the requested Comprehensive Plan Map Amendment is consistent with the Public Facilities and Services Element of the Comprehensive Plan.

### *12- Economic Element (2019)*

#### Findings of Fact:

The Economic Element is the City's method of complying with Statewide Planning Goal 9. The Economic Element of the Central Point Comprehensive Plan was updated in 2019 and analyzed the available and needed employment lands for both short term and long term needs as well as the most suitable industry sectors for the City.



The Sectors identified in the Economic Element most suitable for the City were Truck Transportation, Specialty Food Products Manufacturing and Retail trade.

The subject property is currently Employment Commercial intended for retail, professional offices, and higher density housing with ground floor commercial uses. The site is not appropriate for truck transportation and specialty food products manufacturing.

The proposed designation of High Density with HMR zoning would allow multifamily housing with mixed use commercial on ground floor street frontages. A site plan is submitted with this application that proposes 45 multifamily dwelling units with 2,514 square feet of commercial lease space on ground floor street frontage.

The Economic Element of the Comprehensive Plan identifies a need for additional commercial space in the City. Since the applications submitted with this development are comparable with the permitted uses in the EC designation and zoning district and will have negligible effects on the supply of commercial lands available in the City.

Goal 6 of the economic element of the comprehensive plan states the City is to maintain an adequate supply of suitable short term (five year) employment lands.

Policy 4 states the City shall pursue and encourage development of leasable employment buildings (i.e. flexspace) to create opportunities to expand, retain and attract small businesses to Central Point's employment districts.

Policy 8: states adequate Short-Term Supply The City shall assure that, through its Capital Improvement Program, public facilities and transportation facilities are available and adequate in capacity to maintain a supply of competitive short-term buildable lands sufficient to meet employment needs within a five-year period, particularly for the retail, specialty foods, professional, health care, and trucking sectors.

Policy 9: states the City shall maintain a supply of competitive ~~short-term~~ <sup>long-term</sup> employment lands in the medium and large site categories equivalent to the twenty-year demand for those categories. The supply of short-term employment land shall be reviewed and updated every four years consistent with the Portland State University Population Research Center Coordinated Population Forecasting schedule. When it is determined that the supply of land as measured in terms of number of sites and/or acreage in the medium and large site categories is inadequate to serve the twenty-year

This application will amend the general land use plan map from the Employment Commercial designation to the High Density designation allowing for a zone change to the High Mix Residential/ Commercial (HMR/TOD) zoning district. The uses allowed in these two zoning districts allow for the development of ground floor commercial uses and multifamily dwelling units.

This consolidated application proposes the development of 2,512 square feet of lease space for suitable commercial development. ~~The Economic Element specifically identifies~~

~~Truck Transportation, Specialty Food Products Manufacturing and Retail trade as required commercial uses.~~ Truck Transportation, Specialty Food Products Manufacturing are not suitable for the site and the requested map amendment will allow a very similar development as the existing designation. The impact of the supply of employment lands associated with this application is not significant.

Staff Comment: By providing ground floor commercial areas along Boulder Ridge and Twin Creeks Crossing, the amendment is consistent with the Economic Element and the City's commercial land supply needs.

Conclusions of Law:

The City Council can conclude the requested Minor Comprehensive Plan Map Amendment will not have a significant impact on employment lands in the City.

*13- Energy Utilization Element (1983)*

Findings of Fact:

The Energy Utilization Element of the Comprehensive Plan and Land Development Code and the building Codes address energy conservation for new developments.

Efficient use of infrastructure is an important component of the Energy Utilization Element. All urban facilities are available at the site for future development.

The Land Development Code has provisions for building orientation to attempt to optimize the siting of buildings for energy conservation and the State also has a progressive energy code to assure developments are constructed in an energy efficient manner.

Conclusions of Law:

The City Council can conclude the City has considered the effects of Energy Conservation with the requested Minor Comprehensive Plan Map Amendment.

*14- Transportation Element (2008)*

Findings of Fact:

The City of Central Point has an adopted Transportation System Plan. The subject property is within the Twin Creeks TOD. This is a master planned area, when approved, a traffic impact analysis was used for the entire TOD.

The change from the Employment Commercial designation to the High-Density Residential designation will result in less intensive the permitted uses. The permitted uses High

Density Residential zone will be less intensive the permitted uses in the Employment Commercial zone resulting in less impacts to the transportation system.

~~The Oregon Transportation Planning Rule requires a jurisdiction considers all modes of transportation in a land use decision. A review of this property determines water and rail transportation are not available.~~

~~The subject property is 3 miles from the Rogue Valley International Airport, and 1.5 miles from Interstate Highway 5 (I-5). The subject property has frontage on Twin Creeks Crossing, classified as a minor arterial street in the Central Point Transportation System Plan (TSP).~~

~~The nearest Rogue Valley Transit District (RVTD) route is Route 40 with a bus stop are located on approximately .5 miles from the site.~~

Twin Creeks Crossing is a minor arterial street with a center median and divided travel lanes. The frontage of the subject property is improved with curb, gutter and a curb tight 12 foot wide sidewalk.

The site is within the Twin Creeks TOD which has a priority for multimodal transportation opportunities specifically bicycle and pedestrian travel.

The standards are consistent with the adopted and acknowledged Central Point Transportation System Plan, therefore also consistent with the Oregon Transportation Planning Rule.

The subject property is within an adopted circulation plans area.

A Transportation analysis prepared by Southern Oregon Traffic Engineers has been submitted with these findings demonstrating facility adequacy and compliance with the Oregon Transportation Planning Rule.

#### Conclusions of Law:

The City Council can conclude The City has an adopted Transportation System Plan that includes all forms of transportation.

The transportation facilities for the current EC GLUP designation are adequate at the site and the requested Minor Comprehensive Plan Map Amendment to High Density Residential is less intensive that the existing designation. The transportation facilities are adequate for the request.

Staff Comment: Commercial Policy 1 of the Land Use Element states that the City shall maintain the zoning of all commercial lands as necessary to comply with the Economic Element. As demonstrated in findings for the Economic Element, the ground floor commercial areas along Boulder Ridge and Twin Creeks Crossing maintain consistency with the goals and policies of the Economic Element.

Findings of Fact:

The Land Use Element of the Comprehensive Plan acknowledges the Plan must be flexible and adaptable to changing needs within the City.

Existing development in the vicinity of the subject property has resulted in an adequate supply of street frontage commercial lease space for the Twin Creeks community.

The subject property is located within the Twin Creeks TOD area. The current General Land Use Map designation for the subject property is Employment Commercial. This designation is intended to by a higher intensity use to provide commercial (employment) spaces near the core of the TOD. Multifamily housing is allowed above ground floor commercial uses.

The High-Density designation located in the TOD allow for the High Density Mix (HMR) zoning district. The uses in the HMR zone are multi family development with ground floor street frontage commercial uses. The HMR uses are also intended to be higher intensity uses near the TOD core.

The High Density Designation with the HMR TOD zoning will provide commercial space on the street frontage of the Twin Creeks Crossing similar to the uses on the opposite side of the street to create a prominent entrance to the Twin Creeks community.

The site is currently vacant, with all urban facilities including streets, water stormwater and sewer are currently developed and available for the direct connections of the future development.

Conclusions of Law:

The City Council can conclude the requested Minor Comprehensive Plan Map Amendment is consistent with the Land Use Element of the Comprehensive Plan.

Conclusions of Law Comprehensive Plan:

The City Council can conclude the requested Minor Comprehensive Plan Map Amendment is consistent with all applicable elements of the Comprehensive Plan.

\*\*\*\*\*

*C. For urban growth boundary amendments findings demonstrate that adequate public services and transportation networks to serve the property are either available, or identified for construction in the city's public facilities master plans (major and minor amendments); and*

Findings of Fact:

The application is not an Urban Growth Boundary Expansion, and this criterion is not applicable.

Conclusions of Law:

The City Council can conclude this application for a Minor Comprehensive Plan Map Amendment is not an Urban Growth Boundary Expansion and this criterion C is not applicable.

*D. The amendment complies with OAR 660-012-0060 of the Transportation Planning Rule. (Ord. 1989 §1(part), 2014; Ord. 1436 §2(part), 1981. Formerly 17.96.050).*

Findings of Fact:

~~The Oregon Transportation Planning Rule requires a jurisdiction considers all modes of transportation in a land use decision. A review of this property determines water and rail transportation are not available.~~

~~The subject property is 3 miles from the Rogue Valley International Airport, and 1.5 miles from Interstate Highway 5 (I-5). The subject property has frontage on Twin Creeks Crossing, classified as a minor arterial street in the Central Point Transportation System Plan (TSP).~~

~~The nearest Rogue Valley Transit District (RVTD) route is Route 40 with a bus stop located approximately .5 miles from the site.~~

Twin Creeks Crossing is a minor arterial street with a center median and divided travel lanes. The frontage of the subject property is improved with curb, gutter and a curb tight 12-foot-wide sidewalk.

The site is within the Twin Creeks TOD which has a priority for multimodal transportation opportunities specifically bicycle and pedestrian travel.



The standards are consistent with the adopted and acknowledged Central Point Transportation System Plan, therefore also consistent with the Oregon Transportation Planning Rule.

The subject property is within an adopted circulation plans area.

A Transportation analysis prepared by Southern Oregon Traffic Engineers has been submitted with these findings demonstrating facility adequacy and compliance with the Oregon Transportation Planning Rule.

Conclusions of Law:

The City Council can conclude this application is consistent with the Comprehensive Plan, the adopted Central Point Transportation System Plan and the Oregon Transportation Planning Rule.

**Staff Comment:** As presented in the Trip Generation Assessment, dated 04/17/2023, the proposed amendment does not significantly affect transportation facilities or alter the functional classification of any existing or planned infrastructure; therefore, it can be concluded the amendment is consistent with the Transportation System Plan and the Transportation Planning Rule.

Application Summary and Conclusions of Law:

These Finding of Fact and Conclusions of Law have identified the requirements within the Central Point Municipal Code for a Comprehensive Plan Amendment.

The request to change the General Land Use Plan Map designation on the subject property from the current Employment Commercial designation to High Density is classified as a Minor Comprehensive Plan Map Amendment.

The approval criteria for the requested Minor Comprehensive Plan Map Amendment states the request must be consistent with all applicable Statewide Planning Goals. The applicable goals have been identified in these finding and the approving authority can conclude the request is consistent with the applicable Statewide Planning Goals.

The requested Minor Comprehensive Plan Map Amendment must be consistent with the Central Point Comprehensive Plan and these findings of fact demonstrate compliance.

The requested Minor Comprehensive Plan Map Amendment is not an Urban Growth Boundary Expansion request.

These findings of fact have demonstrated the request is consistent with the Oregon Transportation Planning Rule.



The approving authority can conclude this request for a Minor Comprehensive Plan Map Amendment is consistent with the approval criteria as provided in the Central Point Municipal Code and the Comprehensive Plan.

On behalf of the applicant, I request the approval of this Minor Comprehensive Plan Map Amendment.

Scott Sinner  
Scott Sinner Consulting, Inc.

**PLANNING DEPARTMENT SUPPLEMENTAL  
FINDINGS OF FACT AND CONCLUSIONS OF LAW  
File No.: CPA-23002**

**Before the City of Central Point Planning Commission  
Consideration of a Comprehensive Plan Map Change on 1.62 acres for  
a property identified on the Jackson County Assessor’s map  
as 37S 2W 03CA, Tax Lot 1500.**

**Applicant:** ) Findings of Fact  
Smith Crossing LLC ) and  
353 Dalton Street ) Conclusion of Law  
Medford OR 97501 )

**PART 1  
INTRODUCTION**

The proposed comprehensive plan map amendment requests to classify the above property, located within the City of Central Point, from Employment Commercial to High Density Residential on the General Land Use Plan (GLUP) Map.

In accordance with CPMC 17.96.300 and 17.05.100, the proposed Minor Comprehensive Plan map Amendment is a quasi-judicial map amendment, which is processed using Type III application procedures set forth in Section 17.05.400.

Approval criteria for this Application include CPMC 17.96, which includes compliance with the statewide planning goals, comprehensive plan and Transportation Planning Rule. The amendment’s compliance with applicable criteria are presented in Part 2 and summarized in Part 3.

**PROJECT BACKGROUND**

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The applicant proposes a 45-unit multifamily development with limited ground floor commercial uses along the Twin Creeks Crossing frontage. The 1.62 acre project site is zoned Employment Commercial (EC) and is identified in the Twin Creeks Master Plan as a site to provide 1-2 stories of retail, professional office uses. The proposed use is not consistent with the current zoning district, which only allows residential units above ground floor commercial. The current application proposes to modify the Comprehensive Plan Map from Employment Commercial (EC) to High Density Residential/HMR, which could permit mixed use opportunities on the site, including vertical (mixed use in same building) and horizontal (mixed use in adjacent buildings).

The City of Central Point uses a two (2) map system with the Comprehensive Plan Map and the Land Use Map. The Comprehensive Plan Map provides a broad view of development within the City; whereas, the Land Use Map, commonly referred to as the Zoning Map, represents the spatial distribution of all land uses and provides parcel specific information for development. The Land Use Element of the City’s Comprehensive Plan requires the Comprehensive Plan Map and the Zoning Map to maintain consistency at all times. Therefore, the application for comprehensive map amendment is accompanied by, and being processed concurrently with, an application for a Zone Map Amendment (see File No. ZC-23002) that proposes to change the zoning map to High Mix Residential that is consistent with the proposed comprehensive plan map change to high density residential.

## PART 2 - ZONING CODE COMPLIANCE

### **17.96.200 Initiation of amendments.**

A proposed amendment to the comprehensive plan or urban growth boundary may be initiated by either:

- A. A resolution by the planning commission to the city council;
- B. A resolution of intent by the city council; or for zoning map amendments;
- C. An application by one or more property owners, or their agents, of property affected by the proposed amendment.

***Finding CPMC 17.96.200:** The Planning Division received an application by the listed applicant and designated agent for the zone change request. The application was accepted as complete on April 18, 2023, indicating the application complied with the required submittals of this Chapter.*

***Conclusion 17.96.200:** Consistent.*

### **17.96.300 Major and minor amendments.**

Proposed amendments to the comprehensive plan, including urban growth boundary amendments, are categorized as either major or minor amendments as defined in Section 17.10.300. Proposals for major revisions shall be processed as a Type IV procedure per Section 17.05.500. Proposals for minor changes shall be processed as a Type III procedure per Section 17.05.400.

***Finding CPMC 17.96.300:** The proposed amendment is the application of adopted policy to a particular property and is not the adoption of new policy. The requested change is a Minor Amendment, as defined in Section 17.10.300, and has been processed in accordance with Type III procedures in CPMC 17.05.400.*

***Conclusion CPMC 17.96.300:** Consistent.*

### **17.96.400 Submittal and timing of proposals.**

Applications for an amendment to the comprehensive plan, or urban growth boundary, may be submitted at any time. Once accepted proposals shall be scheduled by the city council by resolution of intent. The applications and review thereof shall conform to the provisions of Chapter 17.05 and all applicable laws of the state.

***Finding CPMC 17.96.400:** The application was accepted as complete on April 18, 2023. As evidenced by the land use notifications, including notice to DLCD on May 2, 2023, notice to surrounding property owners and advertisement on the City's website ([www.centralpointoregon.gov/projects](http://www.centralpointoregon.gov/projects)), the City has duly noticed and processed the application in accordance with Chapter 17.05.*

***Conclusion CPMC 17.96.400:** Consistent.*

### **CPMC 17.96.500 Approval criteria.**

A recommendation or a decision to approve or to deny an application for an amendment to the comprehensive plan or urban growth boundary shall be based on written findings and conclusions that address the following criteria:

- A. Approval of the request is consistent with the applicable statewide planning goals (major amendments only);

***Finding CPMC 17.10.400 (A):*** *The proposed amendments have been reviewed against the Statewide Planning Goals and found to comply as follows:*

*Goal 1- Citizen Involvement.* *This goal requires that all citizens be given the opportunity to be involved in all phases of the planning process. As evidenced by the land use notifications, including notice to DLCD on May 2, 2023, notice to surrounding property owners and advertisement on the City’s website ([www.centralpointoregon.gov/projects](http://www.centralpointoregon.gov/projects)), the City has duly noticed the application as necessary to allow the opportunity for citizen participation in the public hearings scheduled with the Planning Commission (6-6-2023) and City Council (6-22-2023) for the proposed map changes consistent with Goal 1.*

*Goal 2 – Land Use Planning.* *Goal 2 addresses the land use planning procedures in Oregon, including the need to adopt comprehensive plans and implementing ordinances based on factual information. The proposed change is based on factual information from the municipal code and existing policy in the comprehensive plan.*

*Goal 3 – Agricultural Lands.* *Goal 3 addresses agricultural land within rural areas. The proposed map amendment does not affect agricultural lands or agricultural buffers that would be required adjacent to agricultural lands outside the urban growth boundary. On this basis, Goal 3 does not apply to the proposed amendment.*

*Goal 4 – Forest Lands.* *Goal 4 addresses forest lands within rural areas. The proposed amendment does not affect forest lands or lands adjacent to forest lands; therefore, Goal 4 does not apply.*

*Goal 5 – Open Spaces, Scenic and Historic Areas, and Natural Resources.* *Goal 5 establishes a process for each natural and cultural resource to be inventoried and evaluated. If deemed to be significant, local governments may preserve, allow uses that conflict with the resource, or allow a combination of the two. In Central Point, floodplains and historic structures have been inventoried, and ordinances have been adopted to minimize impacts to each. The subject property of the proposed map amendment is within the Special Flood Hazard Area of Griffin Creek. Proposed development on the property will be subject to applicable policies, actions and standards in the Central Point Municipal Code to minimize flood losses and protect the property and surrounding properties from the dangers of flooding.*

*Goal 6 – Air, Water and Land Resources Quality.* *Goal 6 requires local comprehensive plans and implementing ordinances to comply with state and federal regulations on air, water and land quality resource requirements. The proposed amendment is not expected to have impacts on compliance with these standards and requirements.*

*Goal 7 – Areas Subject to Natural Hazards.* *Goal 7 requires appropriate safeguards when planning for development in floodplains or other areas subject to natural hazards. The subject property of the proposed map amendment is within the Special Flood Hazard Area of Griffin Creek. Proposed development on the property will be subject to applicable policies, actions and standards in the Central Point Municipal Code to minimize flood losses and protect the property and surrounding properties from the dangers of flooding.*

Goal 8 – Recreational Needs. This goal requires communities to inventory existing parks and recreational facilities, and to project the needed facilities to serve all populations within the community. The development of the subject property is addressed in the Twin Creeks Master Plan, which includes an interconnected network of active and passive parks and recreation areas. As such, the needs for parks and recreational facilities are addressed throughout the master plan area. Since the proposed amendment maintains the mix of allowed residential and commercial uses while providing flexibility for horizontal configuration, future permitted uses are generally the same and therefore not expected to generate additional need for parks and recreation services.

Goal 9 – Economy of the State. Goal 9 addresses diversification and improvement of the economy and specifically addresses commercial and industrial land. The proposed changes affect the comprehensive plan map designation and zoning designation of the subject property. The EC zone currently permits a broad range of commercial uses along with multifamily uses only when located above the ground floor commercial as part of vertical mixed uses.

The proposed modification would allow mixed use opportunities on this site, including vertical (mixed use in the same building) and horizontal (mixed use in separate buildings on a site). Provided commercial uses in the horizontal mixed use are consistent with Exhibit 37 (Civic and Commercial Plan) of the Twin Creeks Master Plan, the proposed amendments are consistent with Goal 9. Since Master Plan compliance is required for Site Plan and Architectural Review, approval, it can be concluded that the proposed Comprehensive Plan Map Amendment is consistent with Goal 9.

Goal 10 – Housing. Goal 10 requires local communities to plan for and accommodate housing needs in the City. The proposed map amendments would allow mixed use opportunities on this site, including vertical (mixed use in the same building) and horizontal (mixed use in separate buildings on a site) and continuing to provide multifamily uses on the subject property. As such, the proposed amendments continue to allow housing, which is consistent with the City's need to produce additional housing and with Goal 10.

Goal 11 – Public Facilities and Services. Goal 11 calls for efficient planning of public services such as sewer, water, law enforcement and fire protection to assure that public services are planned in accordance with a community's needs and capacities rather than to be forced to respond to development as it occurs. Public facilities and services are planned in accordance with the Comprehensive Plan Public Facilities Element and updated master plans for water, stormwater, etc. These facilities and services have been established to accommodate full build-out of the Twin Creeks Master Plan area for the benefit of the project site and other properties therein. The proposed amendment will not affect the provision of services or generate additional need for services since the proposed zoning will continue to allow a mix of commercial and residential uses.

Goal 12 – Transportation. Goal 12 aims to provide a safe, convenient and economic transportation system. The development of the subject property was considered during the approval of the Twin Creeks Master Plan, which includes analysis of transportation needs, traffic circulation and transit services. A Trip Generation Analysis, prepared by Southern Oregon Transportation Engineering dated April 17, 2023, concludes the proposed amendment is consistent with the original Traffic Impact Analysis for the Master Plan area and will not generate additional impacts on transportation facilities.

Goal 13 – Energy. Goal 13 has to do with conserving all forms of energy. The subject property is within the Twin Creeks Master Plan area and located along a high capacity transportation corridor. As such, the proposed amendment and subsequent development of the subject property are not expected to increase energy utilization.

Goal 14 – Urbanization. Goal 14 has to do with managing the City’s growth in conjunction with project need based on population and land use. The proposed map amendment is within the area considered for development within the Twin Creeks Master Plan, which considered development of the subject property to urban development standards and previously considered within the City’s land needs. As such, the proposed amendment will not affect population growth or land need.

Goals 15- Applies to the Willamette Valley and does not apply to the City of Central Point.

Goals 16-19 - Applies to coastal areas and does not affect the City of Central Point.

**Conclusion CPMC 17.96.500(A):** Based on the nature of the proposed amendment and the findings above, the proposed change to Central Point Zone Map is consistent with all applicable Statewide Planning Goals.

- B. Approval of the request is consistent with the Central Point comprehensive plan (major and minor amendments);

**Finding CPMC 17.96.500 (B):** A review of the Central Point Comprehensive Plan identified the following relevant policies:

**Urbanization Element:**

Policy 5: Promote efficient and economical patterns of mixed land uses and development densities that locate a variety of different life activities ,such as employment, housing, shopping and recreation in convenient proximity; and that are, or can be made, accessible by multiple modes of transportation—including walking, bicycling, and transit in addition to motor vehicles—within and between neighborhoods and districts.

Finding Urbanization Policy 5: The proposed modification would allow mixed use opportunities on this site, including vertical (mixed use in the same building) and horizontal (mixed use in separate buildings on a site). The site is within the area developed under the Twin Creek Master Plan that includes multiple modes of transportation within and between the neighborhoods.

Conclusion Urbanization Policy 5: Consistent

**Economic Element:**

Goal 6: To maintain at all times an adequate supply of suitable short-term (five-year) employment lands.

Finding Economic Goal 6: The proposed changes affect the comprehensive plan map designation and zoning designation of the subject property. The EC designation on the comprehensive plan map and zone map currently permits a broad range of commercial uses along with multifamily uses only when located above the ground floor commercial as part of



*vertical mixed uses. The proposed modification allows mixed use opportunities on this site, including vertical (mixed use in the same building) and horizontal (mixed use in separate buildings on a site). Provided commercial uses in the horizontal mixed use are consistent with Exhibit 37 (Civic and Commercial Plan) of the Twin Creeks Master Plan, the proposed amendments are consistent with the economic element.*

*Conclusion Economic Goal 6: Consistent.*

*Policy 4: Small Businesses: The City shall pursue and encourage development of leasable employment buildings (i.e. flex space) to create opportunities to expand, retain and attract small businesses to Central Point's employment districts.*

*Finding Policy 4: Small Businesses: The proposed modification would allow mixed use opportunities on this site, including vertical (mixed use in the same building) and horizontal (mixed use in separate buildings on a site). Provided commercial uses in the horizontal mixed use are consistent with Exhibit 37 (Civic and Commercial Plan) of the Twin Creeks Master Plan, the leasable commercial space fronting Twin Creeks Crossing will continue to provide opportunities for small businesses.*

*Conclusion Policy 4: Small Businesses: Consistent.*

*Policy 8: Adequate Short-Term Supply. The City shall assure that, through its Capital Improvement Program, public facilities and transportation facilities are available and adequate in capacity to maintain a supply of competitive short-term buildable lands sufficient to meet employment needs within a five-year period, particularly for the retail, specialty foods, professional, health care, and trucking sectors.*

*Finding Policy 8: Adequate Short-Term Supply: The competitive short-term supply of land means those lands are ready for development with serviceable facilities, or public facilities, utilities and transportation facilities, that have adequate capacity for planned development. The proposed amendment is within the planning area for the Twin Creeks Master Plan that provides adequate and serviceable facilities to the site.*

*The proposed modification would allow mixed use opportunities on this site, including vertical (mixed use in the same building) and horizontal (mixed use in separate buildings on a site). Provided commercial uses in the horizontal mixed use are consistent with Exhibit 37 (Civic and Commercial Plan) of the Twin Creeks Master Plan, the leasable commercial space fronting Twin Creeks Crossing will continue to provide opportunities for retail and professional uses.*

*Conclusion Policy 8: Adequate Short-Term Supply: Consistent.*

*Policy 9: Prepare for Long-Term Needs: The City shall maintain a supply of competitive short-term employment lands in the medium and large site categories equivalent to the twenty-year demand for those categories. The supply of short-term employment land shall be reviewed and updated every four years consistent with the Portland State University Population Research Center Coordinated Population Forecasting schedule. When it is determined that the supply of land as measured in terms of number of sites and/or acreage in the medium and large site categories is inadequate to serve the twenty-year needs then the City shall amend its UGB to include additional short-term (5-year) employment lands.*

*Finding Policy 9: Prepare for Long-Term Needs:* *The Land Use Element defines the EC classification as lands “...designed to accommodate a wide variety of retail, service, and office uses in an environment that is pedestrian oriented...” Site requirements for uses in EC zones are typically smaller (0.5-5 acres) that accommodate smaller building sizes (200-15,000 square feet). The project site is approximately 1.62 acres and is outside the demand projections for medium and large site needs assessments.*

*Conclusion Policy 9: Prepare for Long-Term Needs:* *Not applicable.*

***Land Use Element:***

*Commercial Policy 1:* *Maintain the zoning of all commercial areas of Central point as necessary to comply with the Economic Element.*

*Finding Commercial Policy 1:* *As demonstrated in the findings for Goal 6 of the Economic Element, the proposed modification allows mixed use opportunities on this site, including vertical (mixed use in the same building) and horizontal (mixed use in separate buildings on a site). Provided commercial uses in the horizontal mixed use are consistent with Exhibit 37 (Civic and Commercial Plan) of the Twin Creeks Master Plan, the proposed amendments are consistent with the economic element.*

*Conclusion Commercial Policy 1:* *Consistent.*

***Conclusion CPMC 17.96.500(B):****Based on the evaluation of applicable Comprehensive Plan policies, the proposed comprehensive plan map amendment is consistent with the Central Point Comprehensive Plan*

- C. For urban growth boundary amendments findings demonstrate that adequate public services and transportation networks to serve the property are either available, or identified for construction in the city’s public facilities master plans (major and minor amendments); and

***Finding CPMC 17.96.500 (C):*** *The proposed amendment to the City’s comprehensive plan map does not include an amendment to the urban growth boundary.*

***Conclusion CPMC 17.96.500(C):*** *Not applicable.*

- D. The amendment complies with OAR 660-012-0060 of the Transportation Planning Rule.

**OAR 660-012-0060 – Transportation Planning Rule**

The State Transportation Planning Rule (TPR) in OAR 660-012-0060 requires changes to land use plans and land use regulations (i.e. Comprehensive Plan Map Amendments and Zoning Map Amendments) to be consistent with the function and capacity of existing and planned transportation facilities. Oregon Administrative Rule (OAR) 660-012-0060 subsection (1) states the following:

- (1) 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, unless the amendment is allowed under section (3), (9) or (10) 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 (exclusive of corrections of map errors in an adopted plan);
- (b) Change standards implementing a functional classification system; or
- (c) Result in any of the effects listed in paragraphs (A) through (C) of this subsection based on projected conditions measured at the end of the planning period identified in the adopted TSP. As part of evaluating projected conditions, the amount of traffic projected to be generated within the areas of the amendment may be reduced if the amendment includes an enforceable, ongoing requirement that would demonstrably limit traffic generation, including, but not limited to, transportation demand management. This reduction may diminish or completely eliminate the significant effect of the amendment.
  - (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.

***Finding OAR 660-012-0060(1):*** *A Trip Generation Analysis was prepared for the proposed zone change by Southern Oregon Transportation Engineering, LLC on April 17, 2023. The Study evaluates the proposed zone change on the 1.62-acre project site (37S 2W 03CA Tax Lot 1500) from EC to HMR. Per the Trip Generation Analysis, the trip generation of the proposed amendment was evaluated based on 45 multi-family dwelling units and 2,514 square feet of commercial gross floor area. The analysis reported a total of 700 daily trips and 57 PM Peak trips, which is a decrease in total daily trips and PM Peak trips on the surrounding streets. Per the Trip Generation Analysis, the traffic generated by the proposed development will not alter the functional classification for any existing or planned infrastructure.*

***Conclusion OAR 660-012-0060(1):*** *Consistent.*

- (2) If a local government determines that there would be a significant effect, then the local government must ensure that allowed land uses are consistent with the identified function, capacity, and performance standards of the facility measured at the end of the planning period identified in the adopted TSP through one or a combination of the remedies listed in (a) through (e) below, unless the amendment meets the balancing test in subsection (2)(e) of this section or qualifies for partial mitigation in section (11) of this rule. A local government using

subsection (2)(e), section (3), section (10) or section (11) to approve an amendment recognizes that additional motor vehicle traffic congestion may result and that other facility providers would not be expected to provide additional capacity for motor vehicles in response to this congestion.

- (a) Adopting measures that demonstrate allowed land uses are consistent with the planned, function, capacity, and performance standards of the facility.
- (b) Amending the TSP or comprehensive plan to provide transportation facilities, improvements or services adequate to support the proposed land uses consistent with the requirements of this division; such amendments shall include a funding plan or mechanism consistent with section (4) or include an amendment to the transportation finance plan so that the facility, improvement, or service will be provided by the end of the planning period.
- (c) Amending the TSP to modify the planned function, capacity or performance standards of the transportation facility.
- (d) Providing other measures as a condition of development or through a development agreement or similar funding method, including but not limited to transportation system management measures or minor transportation improvements. Local governments shall, as part of the amendment, specify when measures or improvements provided pursuant to this subsection will be provided.
- (e) Providing improvements that would benefit modes other than the significantly affected mode, improvements to facilities other than the significantly affected facility, or improvements at other locations if:
  - (A) The provider of the significantly affected facility provides a written statement that the system-wide benefits are sufficient to balance the significant effect, even though the improvements would not result in consistency for all standards;
  - (B) The providers of facilities being improved at other locations provide written statements of approval; and,
  - (C) The local jurisdictions where facilities are being improved provide written statements of approval.

***Finding OAR 660-012-0060(2):*** *As demonstrated in the findings and conclusions for OAR 660-012-0060(1), the proposed amendment does not significantly affect transportation facilities.*

***Conclusion OAR 660-012-0060(2):*** *Not applicable.*

- (3) Notwithstanding sections(1) and (2) of this rule, a local government may approve an amendment that would significantly affect an existing transportation facility without assuring that the allowed land uses are consistent with the function, capacity, and performance standards of the facility where:
- (a) In the absence of the amendment, planned transportation facilities, improvements and services as set forth in section (4) of this rule would not be adequate to achieve consistency with the identified function, capacity or performance standard for that facility by the end of the planning period identified in the TSP.
  - (b) Development resulting from the amendment will, at a minimum mitigate the impacts of the amendment in a manner that avoids further degradation to the performance of the facility by the time of the development through one or a combination of transportation improvements or measures;
  - (c) The amendment does not involve property located in an interchange area as defined in paragraph (d)(C); and

For affected state highways, ODOT provides a written statement that the proposed funding and timing for the identified mitigation improvements or measures are, at a minimum, sufficient to avoid further degradation to the performance of the affected state highway. However, if a local government provides the appropriate ODOT regional office with written notice of a proposed amendment in a manner that provides ODOT reasonable opportunity to submit a written statement into the record of the local government proceeding, and ODOT does not provide a written statement, then the local government may proceed with applying subsections (a) through (c) of this section.

***Finding OAR 660-012-0060(2):*** *As demonstrated in the findings and conclusions for OAR 660-012-0060(1), the proposed amendment does not significantly affect transportation facilities.*

***Conclusion OAR 660-012-0060(2):*** *Not applicable.*

- (4) Determinations under sections (1) through (3) of this rule shall be coordinated with affected transportation facility and service providers and other affected local governments.
- (a) In determining whether an amendment has a significant effect on an existing or planned transportation facility under subsection (1)(c) of this rule, local governments shall rely on existing transportation facilities and services and on the planned transportation facilities, improvements and services set forth in subsections (b) and (c) below.
  - (b) Outside of interstate interchange areas, the following are considered planned facilities, improvements, and services:

- (A) Transportation facilities, improvements or services that are funded for construction or implementation in the Statewide Transportation Improvement Program or a locally or regionally adopted transportation improvement program or capital improvement plan or program of a transportation service provider.
  - (B) Transportation facilities, improvements or services that are authorized in a local transportation system plan and for which a funding plan or mechanism is in place or approved. These include, but are not limited to, transportation facilities, improvements or services for which: transportation systems development charge revenues are being collected; a local improvement district or reimbursement district has been established or will be established or will be established prior to development; a development agreement has been adopted; or conditions of approval to fund the improvement have been adopted.
  - (C) Transportation facilities, improvements or services in a metropolitan planning organization (MPO) area that are part of the area's federally-approved, financially constrained regional transportation system plan.
  - (D) Improvements to state highways that are included as planned improvements in a regional or local transportation system plan or comprehensive plan when ODOT provides a written statement that the improvements are reasonably likely to be provided by the end of the planning period.
  - (E) Improvements to regional and local roads, streets or other transportation facilities or services that are included as planned improvements in a regional or local transportation system plan or comprehensive plan when the local government(s) or transportation service provider(s) responsible for the facility, improvement or service provides a written statement that the facility, improvement or service is reasonably likely to be provided by the end of the planning period.
- (c) Within interstate interchange areas, the improvements included in (b) (A)-(C) are considered planned facilities, improvements and services, except where:
- (A) ODOT provides a written statement that the proposed funding and timing of mitigation measures are sufficient to avoid a significant adverse impact on the Interstate Highway system, then local governments may also rely on the improvements identified in paragraphs (b)(D) and (E) of this section; or,
  - (B) There is an adopted interchange area management plan, then local government may also rely on the improvements identified in that plan and which are also identified in paragraphs (b)(D) and (E) of this section.
- (d) As used in this section and section (3):



- (A) Planned interchange means new interchanges and relocation of existing interchanges that are authorized in an adopted transportation system plan or comprehensive plan;
- (B) Interstate highway means Interstates 5, 82, 84, 105, 205 and 405; and,
- (C) Interstate interchange area means:
  - (i) Property within one-quarter mile of the ramp terminal intersection of an existing or planned interchange on an Interstate Highway; or,
  - (ii) The interchange area as defined in the Interchange Area Management Plan adopted as an amendment to the Oregon Highway Plan.
- (e) For purposes of this section, a written statement provided pursuant to paragraphs (b)(D), (b)(E), or (c)(A) provided by ODOT, a local government or transportation facility provider, as appropriate, shall be conclusive in determining whether a transportation facility, improvement or service is a planned transportation facility, improvement or service. In the absence of a written statement, a local government can only rely upon planned transportation facilities, improvements and services identified in paragraphs (b)(A)-(C) to determine whether there is a significant effect that requires application of the remedies in section (2).

***Finding OAR 660-012-0060(4):*** *As demonstrated in the findings and conclusions for OAR 660-012-0060(1), the proposed amendment does not significantly affect transportation facilities.*

***Conclusion OAR 660-012-0060(4):*** *Not applicable.*

- (5) The presence of a transportation facility or improvement shall not be a basis for an exception to allow residential, commercial, institutional, or industrial development on rural lands under this division or OAR 660-004-0022 and 660-004-0028.

***Finding OAR 660-012-0060(5):*** *The application is for an amendment within city limits on lands zoned for commercial use and is not on rural lands. No exceptions are requested as part of the application.*

***Conclusion OAR 660-012-0060(5):*** *Not applicable.*

- (6) If a local government is determining whether proposed land uses would affect or be consistent with planned transportation facilities as provided in sections (1) and (2) using a performance standard based on projected levels of motor vehicle traffic, then the local government shall give full credit for potential reduction in vehicle trips for uses located in mixed-use, pedestrian-friendly centers, and neighborhoods as provided in subsections (a)–(d);

- (a) Absent adopted local standards or detailed information about the vehicle trip reduction benefits of mixed-use, pedestrian-friendly development, local governments shall assume that uses located within a mixed-use, pedestrian-friendly center, or neighborhood, will generate 10 percent fewer daily and peak hour trips than are specified in available published estimates, such as those provided by the Institute of Transportation Engineers (ITE) Trip Generation Manual that do not specifically account for the effects of mixed-use, pedestrian-friendly development. The 10 percent reduction allowed for by this subsection shall be available only if uses that rely solely on auto trips, such as gas stations, car washes, storage facilities, and motels are prohibited;
- (b) Local governments shall use detailed or local information about the trip reduction benefits of mixed-use, pedestrian-friendly development where such information is available and presented to the local government. Local governments may, based on such information, allow reductions greater than the 10 percent reduction required in subsection (a);
- (c) Where a local government assumes or estimates lower vehicle trip generation as provided in subsection (a) or (b), it shall ensure through conditions of approval, site plans, or approval standards that subsequent development approvals support the development of a mixed-use, pedestrian-friendly center or neighborhood and provide for on-site bike and pedestrian connectivity and access to transit as provided for in OAR 660-012-0045(3) and (4). The provision of on-site bike and pedestrian connectivity and access to transit may be accomplished through application of acknowledged ordinance provisions which comply with OAR 660-012-0045(3) and (4) or through conditions of approval or findings adopted with the plan amendment that ensure compliance with these rule requirements at the time of development approval; and
- (d) The purpose of this section is to provide an incentive for the designation and implementation of pedestrian-friendly, mixed-use centers and neighborhoods by lowering the regulatory barriers to plan amendments that accomplish this type of development. The actual trip reduction benefits of mixed-use, pedestrian-friendly development will vary from case to case and may be somewhat higher or lower than presumed pursuant to subsection (a). The commission concludes that this assumption is warranted given general information about the expected effects of mixed-use, pedestrian-friendly development and its intent to encourage changes to plans and development patterns. Nothing in this section is intended to affect the application of provisions in local plans or ordinances that provide for the calculation or assessment of systems development charges or in preparing conformity determinations required under the federal Clean Air Act

***Finding OAR 660-012-0060(6): See Finding OAR 660-012-0060(1).***

***Conclusion OAR 660-012-0060(6): Not applicable.***

(7) Amendments to acknowledged comprehensive plans and land use regulations that meet all of the criteria listed in subsections (a)–(c) shall include an amendment to the comprehensive plan, transportation system plan, the adoption of a local street plan, access management plan, future street plan, or other binding local transportation plan to provide for on-site alignment of streets or accessways with existing and planned arterial, collector, and local streets surrounding the site as necessary to implement the requirements in OAR 660-012-0020(2)(b) and 660-012-0045(3):

- (a) The plan or land use regulation amendment results in designation of two or more acres of land for commercial use;
- (b) The local government has not adopted a TSP or local street plan that complies with OAR 660-012-0020(2)(b) or, in the Portland Metropolitan Area, has not complied with Metro’s requirement for street connectivity as contained in Title 1, Section 3.08.110 of the Regional Transportation Functional Plan; and
- (c) The proposed amendment would significantly affect a transportation facility as provided in section (1).

***Finding OAR 660-012-0060(7):** The subject property is less than two acres in size and the proposed amendment seeks to change the comprehensive plan designation from commercial to high-density residential. The Transportation System Plan for the City of Central Point was acknowledged in 2008. As demonstrated in the findings and conclusions for OAR 660-012-0060(1), the proposed amendment does not significantly affect transportation facilities.*

***Conclusion OAR 660-012-0060(7):** Not applicable.*

(8) A “mixed-use, pedestrian-friendly center or neighborhood” for the purposes of this rule, means:

- (d) Any one of the following:
  - i. An existing central business district or downtown;
  - ii. An area designated as a central city, regional center, town center, or main street in the Portland Metro 2040 Regional Growth Concept;
  - iii. An area designated in an acknowledged comprehensive plan as a transit-oriented development or a pedestrian district; or
  - iv. An area designated as a special transportation area as provided for in the Oregon Highway Plan.
- (e) An area other than those listed in subsection (a) which includes or is planned to include the following characteristics:

- (A) A concentration of a variety of land uses in a well-defined area, including the following:
  - (i) Medium to high density residential development (12 or more units per acre);
  - (ii) Offices or office buildings;
  - (iii) Retail stores and services;
  - (iv) Restaurants; and
  - (v) Public open space or private open space that is available for public use, such as a park or plaza.
- (B) Generally include civic or cultural uses;
- (C) A core commercial area where multi-story buildings are permitted;
- (D) Buildings and building entrances oriented to streets;
- (E) Street connections and crossings that make the center safe and conveniently accessible from adjacent areas;
- (F) A network of streets and, where appropriate, accessways and major driveways that make it attractive and highly convenient for people to walk between uses within the center or neighborhood, including streets and major driveways within the center with wide sidewalks and other features, including pedestrian-oriented street crossings, street trees, pedestrian-scale lighting and on-street parking;
- (G) One or more transit stops (in urban areas with fixed route transit service); and
- (H) Limit or do not allow low-intensity or land extensive uses, such as most industrial uses, automobile sales and services, and drive-through services.

***Finding OAR 660-012-0060(8):*** *The subject property meets the definition of a mixed use, pedestrian-friendly center or neighborhood as it is located within a transit oriented development designated on the comprehensive plan map.*

***Conclusion OAR 660-012-0060(8):*** *Consistent.*

- (9) Notwithstanding section (1) of this rule, a local government may find that an amendment to a zoning map does not significantly affect an existing or planned facility if all of the following requirements are met:

- (a) The proposed zoning is consistent with the existing comprehensive plan map designation and the amendment does not change the comprehensive plan map;

***Finding OAR 660-012-0060(9)(a):*** *The City of Central Point uses a two (2) map system with the Comprehensive Plan Map and the Land Use Map. The Comprehensive Plan Map provides a broad view of development within the City; whereas, the Land Use Map, commonly referred to as the Zoning Map, represents the spatial distribution of all land uses and provides parcel specific information for development. The application for comprehensive plan map amendment is being processed concurrently with an application for a Zone Map Amendment (see File No. ZC-23002) that proposes to change the zone map to change the zoning to High Mix Residential (HMR) that is consistent with the proposed high density residential designation in the comprehensive plan.*

***Conclusion OAR 660-012-0060(9)(a):*** *Consistent.*

- (b) The local government has an acknowledged TSP and the proposed zoning is consistent with the TSP; and,

***Finding OAR 660-012-0060(9)(b):*** *The Transportation System Plan for the City of Central Point was acknowledged in 2008 and updated in 2023. The Land Use Goals and Policies in the TSP direct the City to effectively manage the use of land within the urbanized area and manage the Land Element of the Comprehensive Plan in a manner that is consistent with the successful implementation of the TSP.*

*The Land Use Element determines where a land use will be physically sited, how it will be managed to achieve the City's land use goals and includes the street classification system for all streets within the City's urban area to ensure the land uses are compatible with the surrounding infrastructure. At the time the TSP and Land Use Element were acknowledged, they were in balance. As demonstrated in the findings and conclusions for OAR 660-012-0060(1), the proposed amendment does not significantly affect transportation facilities; therefore it can be concluded that the proposed zoning remains consistent with the TSP.*

***Conclusion OAR 660-012-0060(9)(b):*** *Consistent.*

- (c) The area subject to the zoning map amendment was not exempted from this rule at the time of an urban growth boundary amendment as permitted in OAR 660-024-0020(1)(d), or the area was exempted from this rule but the local government has a subsequently acknowledged TSP amendment that accounted for urbanization of the area.

***Finding OAR 660-012-0060(9)(c):*** *The subject property and the surrounding area were not exempted from the Transportation Planning Rule at the time of an urban growth boundary expansion.*

*Conclusion OAR 660-012-0060(9)(c): Not applicable.*

(10) Notwithstanding sections (1) and (2) of this rule, a local government may amend a functional plan, a comprehensive plan or a land use regulation without applying performance standards related to motor vehicle traffic congestion (e.g. volume to capacity ratio or V/C), delay or travel time if the amendment meets the requirements of subsection (a) of this section. This section does not exempt a proposed amendment from other transportation performance standards or policies that may apply including, but not limited to, safety for all modes, network connectivity for all modes (e.g. sidewalks, bicycle lanes) and accessibility for freight vehicles of a size and frequency required by the development.

(a) A proposed amendment qualifies for this section if it:

- (A) Is a map or text amendment affecting only land entirely within a multimodal mixed-use area (MMA); and
- (B) Is consistent with the definition of an MMA and consistent with the function of the MMA as described in the findings designating the MMA.

(b) For the purpose of this rule, “multimodal mixed-use area” or “MMA” means an area:

- (A) With a boundary adopted by a local government as provided in subsection (d) or (e) of this section and that has been acknowledged;
- (B) Entirely within an urban growth boundary;
- (C) With adopted plans and development regulations that allow the uses listed in paragraphs (8)(b)(A) through (C) of this rule and that require new development to be consistent with the characteristics listed in paragraphs (8)(b)(D) through (H) of this rule;
- (D) With land use regulations that do not require the provision of off-street parking, or regulations that require lower levels of off-street parking than required in other areas and allow flexibility to meet the parking requirements (e.g. count on-street parking, allow long-term leases, allow shared parking); and
- (E) Located in one or more of the categories below:
  - (i) At least one-quarter mile from any ramp terminal intersection of existing or planned interchanges;



- (ii) Within the area of an adopted Interchange Area Management Plan (IAMP) and consistent with the IAMP; or
  - (iii) Within one-quarter mile of a ramp terminal intersection of an existing or planned interchange if the mainline facility provider has provided written concurrence with the MMA designation as provided in subsection (c) of this section.
- (c) When a mainline facility provider reviews an MMA designation as provided in subparagraph (b)(E)(iii) of this section, the provider must consider the factors listed in paragraph (A) of this subsection.
  - (A) The potential for operational or safety effects to the interchange area and the mainline highway, specifically considering:
    - (i) Whether the interchange area has a crash rate that is higher than the statewide crash rate for similar facilities;
    - (ii) Whether the interchange area is in the top ten percent of locations identified by the safety priority index system (SPIS) developed by ODOT; and
    - (iii) Whether existing or potential future traffic queues on the interchange exit ramps extend onto the mainline highway or the portion of the ramp needed to safely accommodate deceleration.
  - (B) If there are operational or safety effects as described in paragraph (A) of this subsection, the effects may be addressed by an agreement between the local government and the facility provider regarding traffic management plans favoring traffic movements away from the interchange, particularly those facilitating clearing traffic queues on the interchange exit ramps.
- (d) A local government may designate an MMA by adopting an amendment to the comprehensive plan or land use regulations to delineate the boundary following an existing zone, multiple existing zones, an urban renewal area, other existing boundary, or establishing a new boundary. The designation must be accompanied by findings showing how the area meets the definition of an MMA. Designation of an MMA is not subject to the requirements in sections (1) and (2) of this rule.
- (e) A local government may designate an MMA on an area where comprehensive plan map designations or land use regulations do not meet the definition, if all of the other elements meet the definition, by concurrently adopting comprehensive plan or land use regulation amendments necessary to meet the definition. Such amendments are not subject to performance standards related to motor vehicle traffic congestion, delay or travel time.

***Finding OAR 660-012-0060(10):*** *The proposed amendment affects land within an Activity Center, an area designated in the comprehensive plan for mixed uses with medium to high density. The activity center promotes pedestrian oriented development with transit services. However, the activity centers are not consistent with the definition of a Multimodal Mixed Use Area (MMA), as defined in the TPR. As shown in the Applicant's Trip Generation Analysis and demonstrated in the findings and conclusions for OAR 660-012-0060(1), the proposed amendment does not significantly affect transportation facilities and the functional plan will not change.*

***Conclusion OAR 660-012-0060(10):*** *Not applicable.*

(11) A local government may approve an amendment with partial mitigation as provided in section (2) of this rule if the amendment complies with subsection (a) of this section, the amendment meets the balancing test in subsection (b) of this section, and the local government coordinates as provided in subsection (c) of this section.

(a) The amendment must meet paragraphs (A) and (B) of this subsection.

(A) Create direct benefits in terms of industrial or traded-sector jobs created or retained by limiting uses to industrial or traded-sector industries.

(B) Not allow retail uses, except limited retail incidental to industrial or traded sector development, not to exceed five percent of the net developable area.

(C) For the purpose of this section:

(i) "Industrial" means employment activities generating income from the production, handling, or distribution of goods including, but not limited to, manufacturing, assembly, fabrication, processing, storage, logistics, warehousing, importation, distribution and transshipment, and research and development.

(ii) "Traded-sector" means industries in which member firms sell their goods or services into markets for which national or international competition exists.

(b) A local government may accept partial mitigation only if the local government determines that the benefits outweigh the negative effects on local transportation facilities and the local government receives from the provider of any transportation facility that would be significantly affected written concurrence that the benefits outweigh the negative effects on their transportation facilities. If the amendment significantly affects a state highway, then ODOT must coordinate with the Oregon Business Development Department regarding the economic and job creation benefits of the proposed amendment

as defined in subsection (a) of this section. The requirement to obtain concurrence from a provider is satisfied if the local government provides notice as required by subsection (c) of this section and the provider does not respond in writing (either concurring or non-concurring) within 45 days.

- (c) A local government that proposes to use this section must coordinate with Oregon Business Development Department, Department of Land Conservation and Development, area commission on transportation, metropolitan planning organization, and transportation providers and local governments directly impacted by the proposal to allow opportunities for comments on whether the proposed amendment meets the definition of economic development, how it would affect transportation facilities and the adequacy of proposed mitigation. Informal consultation is encouraged throughout the process starting with pre-application meetings. Coordination has the meaning given in ORS 197.015 and Goal 2 and must include notice at least 45 days before the first evidentiary hearing. Notice must include the following:
  - (A) Proposed amendment.
  - (B) Proposed mitigating actions from section (2) of this rule.
  - (C) Analysis and projections of the extent to which the proposed amendment in combination with proposed mitigating actions would fall short of being consistent with the performance standards of transportation facilities.
  - (D) Findings showing how the proposed amendment meets the requirements of subsection (a) of this section.
  - (E) Findings showing that the benefits of the proposed amendment outweigh the negative effects on transportation facilities

***Finding OAR 660-012-0060(10):*** *As shown in the Applicant's Trip Generation Analysis and demonstrated in the findings and conclusions for OAR 660-012-0060(1), the amendment does not significantly affect transportation facilities, the functional plan will not change and mitigation is not required.*

***Conclusion OAR 660-012-0060(10):*** *Not applicable.*

### **PART 3 – CONCLUSION**

As evidenced in findings and conclusions provided in Part 2, the proposed comprehensive plan map amendment is consistent with applicable standards and criteria in the Central Point Municipal Code, including the Statewide Planning Goals (where applicable), Comprehensive Plan, and Statewide Transportation Planning Rule.

# MEMORANDUM

To: City of Central Point  
Planning Division  
140 South Third Street  
Central Point, OR 97502

Date: 04/17/2023

Project: Central Point Station Phase 2 - Plan Amendment and Zone Change

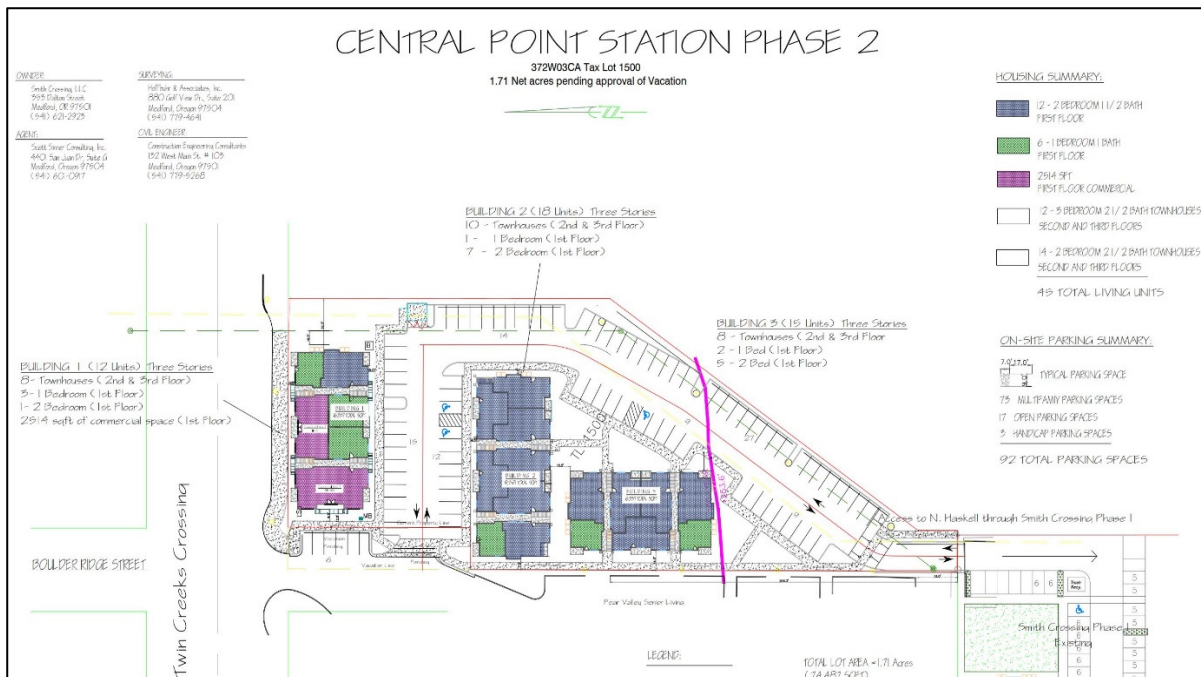
Subject: Trip Generation Assessment

Southern Oregon Transportation Engineering prepared a trip generation assessment for a proposed Minor Comprehensive Plan Amendment and zone change from Employment Commercial (EC TOD) to High Mix Residential / Commercial (HMR/TOD) on 1.62 acres located along the south side of Twin Creeks Crossing, west of the railroad tracks (372W03CA tax lot 1500) in Central Point, Oregon. Our assessment is provided below.

## BACKGROUND

The proposed plan amendment and zone change from EC to HMR/Commercial allows the same highest and best uses, which are commercial uses. For the Transportation Planning Rule (TPR) assessment, the potential trip generation for the proposed plan amendment and zone change is a net zero increase or no increase to the transportation system.

For the proposed site plan assessment, the planned uses on the site include high density residential and commercial, with 45 multi-family residential (MFR) units and 2,514 square feet (SF) of commercial gross floor area (GFA). A site plan is shown below.



## TRIP GENERATION

The Institute of Transportation Engineers (ITE) *Trip Generation Manual, 11<sup>th</sup> Edition* was used to generate trips for the proposed plan amendment and zone change analysis. Land use 220 – Multifamily Housing and 822 – Strip Retail Plaza (<40k) were used in the analysis. A summary of results is provided in Table 1. ITE graphs and land use descriptions are provided in the attachments.

<b>Table 1 – Central Point Station GLUP Amendment and Zone Change Trip Generations</b>									
Land Use	Unit	Size	Daily Trips	Weekday AM Peak Hour			Weekday PM Peak Hour		
				Total	(In)	(Out)	Total	(In)	(Out)
<i>Base Zoning EC TOD</i>									
<b>822 – Strip Retail Plaza</b>	1000 SF	17.95	987	42	25	17	118	59	59
<i>Proposed Zoning HMR/Commercial TOD</i>									
<b>822 – Strip Retail Plaza</b>	1000 SF	17.95	987	42	25	17	118	59	59
<i>Proposed Site Plan</i>									
<b>220 – Multifamily Housing</b>	DU	45	364	37	9	28	40	25	15
<b>822 – Strip Retail Plaza</b>	1000 SF	2,514	336	6	4	2	17	9	8
<b>Site Plan Trip Total</b>			700	43	13	30	57	34	23
<b>Net Difference (potential) EC to HMR/Commercial</b>			<b>0</b>	<b>0</b>			<b>0</b>		
<b>Net Difference (site plan) EC to HMR/Commercial</b>			<b>-287</b>	<b>+1</b>			<b>-61</b>		

SF = square feet, DU = dwelling unit

1. Land Use 822 weekday rate based on fitted curve equation
2. Land Use 220 weekday, a.m., and p.m. rates based on fitted curve equations

As shown in Table 1, the highest and best use within both the base zoning (EC TOD) and proposed zoning (HMR/Commercial TOD) is a commercial use and results in no net increase to the transportation system. The trip generations in Table 1 assume 25% buildout (17,950 SF) for commercial development, but this could be higher or lower depending on site layout. Comparing 25% buildout of commercial development to the proposed site plan (45 multifamily units + 2,514 SF of commercial) shows a net decrease of 287 average daily trips (ADT) overall.

## AGENCY REQUIREMENTS

The City of Central Point requires a traffic impact analysis (Public Works Standards and Specifications 320.10.03(3)) when trip generations fall within specific ranges. These include a change in zoning or plan amendment that generates 300 average daily trips (ADT) more than current zoning, an increase in site traffic by 250 ADT or 25 peak hour trips, an increase in peak hour volume of a particular movement to and from the State highway by 20%, or an increase in use of adjacent streets by vehicles exceeding 20,000 pounds gross vehicle weight.

None of the TIA requirements are shown to be met. No TIA, therefore, is shown to be required unless the City has a safety concern that we are unaware of.

ODOT Development Review Guidelines (Chapter 3.3) provide traffic impact analysis thresholds for various types of developments. A TIA is required to address the TPR when a proposed land use change results in an increase of 1000 ADT or greater than 400 ADT on a

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highway section. The proposed plan amendment and zone change is shown to result in no net increase on the transportation system. The proposed site also does not take direct access to a State facility. No TIA, therefore, is expected to be required by ODOT.

Based on the trip assessment for the proposed plan amendment and zone change, it is our conclusion that a traffic impact analysis is not shown to be required by City of Central Point or ODOT criteria. The proposed zone change is concluded to have no significant effect on existing or planned facilities in accordance with Division 12 of the Oregon Administrative Rules (OAR) 660-012-0060. Please feel free to contact us with any questions.

Respectfully,



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Kimberly Parducci, PE PTOE  
Firm Principal  
Southern Oregon Transportation Engineering, LLC



Attachments: ITE Graphs  
Site Plan  
Assessors map  
Agency requirements

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## ATTACHMENTS

Attachments incorporated herein by reference. Copies available upon request.

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**PLANNING COMMISSION RESOLUTION NO. 905**

**A RESOLUTION FORWARDING A FAVORABLE  
RECOMMENDATION TO THE CITY COUNCIL TO APPROVE A MINOR  
COMPREHENSIVE PLAN MAP AMENDMENT FROM EMPLOYMENT COMMERCIAL  
TO HIGH DENSITY RESIDENTIAL ON A 1.62 ACRE PROPERTY IDENTIFIED ON THE  
JACKSON COUNTY ASSESSOR'S MAP AS 37S 2W 03CA, TAX LOT 1500.**

File No. CPA-23002  
Applicant: Smith Crossing, LLC

**WHEREAS**, the Comprehensive Plan Land Use Map is proposed to re-designate the property identified by the Jackson County Assessor's Map as 37S 2W 03CA Tax Lot 1500 as High Density Residential; and

**WHEREAS**, the proposed Comprehensive Map Amendment is consistent with applicable statewide planning goals; and

**WHEREAS**, the proposed Comprehensive Map Amendment is accompanied by, and being processed concurrently with, an application for a Zone Map Amendment (see File No. ZC-23002) that proposes to change the zoning map to High Mix Residential that is consistent with the proposed comprehensive plan map change to high density residential; and

**WHEREAS**, adequate public services and transportation networks are available to the site; and

**WHEREAS**, the proposed comprehensive plan map change from Employment Commercial to High Density Residential has been determined to be consistent with the State Transportation Planning Rule.

**NOW, THEREFORE, BE IT RESOLVED**, that the City of Central Point Planning Commission, by this Resolution No. 905, does recommend that the City Council approve the comprehensive plan map on the property identified by the Jackson County Assessor's Map as 37S 2W 03CA Tax Lot 1500. This decision is based on the Staff Report dated June 6, 2023 including Attachments A through F attached hereto by reference and incorporated herein.

**PASSED** by the Planning Commission and signed by me in authentication of its passage this 6th day of June, 2023.

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Planning Commission Chair

ATTEST:

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City Representative