

CITY OF ROSEBURG  
PLANNING COMMISSION  
*Monday, August 6, 2018*  
*City Hall Council Chambers – 7:00 pm*

*7/31/18*

*NOTE: It is up to each of you as Commissioners and Staff to let staff know before the day of the meeting if you will not be able to attend. Thank you.*

**AGENDA**

*7/31/18*

- I. CALL TO ORDER
- II. ROLL CALL:           Chair Ron Hughes     Daniel Onchuck     Victoria Hawks  
                                  Charlie Allen         Kerry Atherton     Ron Sperry  
                                  Shelby Osborn
- III. APPROVAL OF MINUTES  
      A. July 2 – Planning Commission Meeting
- IV. AUDIENCE PARTICIPATION: See Reverse for Information
- V. PUBLIC HEARING
- VI. BUSINESS FROM STAFF  
      A. File No. CPA-18-001 Comprehensive Plan Amendment [Quasi-Judicial]  
      B. Director's Report
- VII. BUSINESS FROM THE COMMISSION
- VIII. NEXT MEETING – September 17, 2018
- IX. ADJOURNMENT

**\* \* \* AMERICANS WITH DISABILITIES ACT NOTICE \* \* \***

Please contact the office of the City Recorder, Roseburg City Hall, 900 SE Douglas Avenue, OR 97470-3397 (Phone 541-492-6700) at least 48 hours prior to the scheduled meeting time if you need an accommodation. TDD users please call Oregon Telecommunications Relay Service at 1-800-735-2900.

The agenda packet is available on-line at: <http://www.cityofroseburg.org/your-government/commissions/planning-commission/>

## **AUDIENCE PARTICIPATION INFORMATION**

The Roseburg Planning Commission welcomes and encourages participation by citizens at all meetings. To allow the Commission to deal with business already scheduled, it is asked that anyone wishing to address the Commission follow these simple guidelines.

### **Non-Agenda Items**

If you wish to address the Planning Commission on a matter not on the agenda, at the appropriate time please raise your hand and wait to be recognized by the Chair. Persons addressing the Commission must state their full name and address for the record. All remarks are to be directed to the Planning Commission. For items not on the agenda the presentation should be brief and be on a topic of interest to the Planning Commission, such as a general land use matter. These presentations are reserved for new material which has not been previously considered. The Planning Commission will not be taking action on any item presented under Audience Participation and if needed will provide direction to staff for appropriate follow-up.

### **Agenda Items**

For items on the agenda you will be given an opportunity to address the Commission once the item is called. Agenda items typically begin with establishing those who have party status, (to be explained by the Chair), a report from staff, followed by Commission questions to staff, then the applicant along with anyone he wishes to call as a witness on his behalf will be called to speak, followed by those with party status. After all initial testimony is completed there will be an opportunity for rebuttal. Everyone addressing the Commission is subject to questioning. After the hearing portion of the item is completed, the Commission will discuss the matter with a motion for consideration being presented and acted on.

Once final action is taken on Quasi-Judicial matters, the action of the Commission can be appealed to the City Council within 14 calendar days of the decision by filing a Notice of Review with the Community Development Department. Action on Legislative matters is typically a recommendation to the City Council and will be forwarded to them for final consideration.

For further details or information please contact the Community Development Department Monday through Friday, 8:00 a.m. to 5:00 p.m., at Roseburg City Hall, 900 SE Douglas Avenue, Third Floor, Roseburg OR 97470, phone number 541-492-6750, or e-mail [cmatthews@cityofroseburg.org](mailto:cmatthews@cityofroseburg.org)

**CITY OF ROSEBURG  
PLANNING COMMISSION MEETING MINUTES  
July 2, 2018**

**CALL TO ORDER:** Chair Ron Hughes called the regular meeting of the Roseburg Planning Commission to order at 7:00 p.m. on Monday, July 2, 2018, in the Roseburg City Hall Council Chambers, 900 SE Douglas Avenue, Roseburg, Oregon.

**ROLL CALL**

**Present:** Chair Ron Hughes, Commissioners Charlie Allen, Kerry Atherton, and Shelby Osborn.

**Absent:** Ron Sperry, Victoria Hawks, and Dan Onchuck - excused.

**Others present:** Community Development Director Stuart Cowie, John Lazur and Department Technician Chrissy Matthews.

**APPROVAL OF MINUTES**

Allen moved to approve the May 7, 2018 minutes as presented; Atherton seconded. Motion passed unanimously.

**AUDIENCE PARTICIPATION** – None

**BUSINESS FROM STAFF** –

Cowie introduced Ricky Hoffman who was recently hired as an Associate Planner for the Community Development Department (CDD).

**Land Use Code Text Amendment Workshop –**

**Accessory Dwelling Units (ADU) -**

Cowie discussed the possibility of amending RMC Title 12 Land Use Development Regulations to revise 12.04.030 Residential Districts to accommodate statutory changes and refinements to "Accessory Residential Units" and 12.08.040 Supplemental Standards to allow changes to Mini-Retail Businesses (ie. Food Trucks, Coffee Stands) to define specific standards to allow short-term mobile and long-term retail operations.

Accessory Dwelling Units: House Bill 2007 was introduced in the 2017 legislative session and was described as a bill to "remove barriers to development". This bill has since been signed into law by Governor Brown. Among the provisions of the law, it requires Cities and Counties of a certain size to allow accessory dwelling units (ADUs), which are "interior, attached, or detached residential structures (i.e. granny flats, in-law suite). Many cities and counties like Roseburg already have ADU regulations; however, the overall legislative intent was to remove developmental and cost-prohibitive barriers for those that sought to construct ADUs. Therefore, the City has looked into adopting code similar to DLCDC's model code which is intended to help jurisdictions comply with the legislation.

Cowie reviewed the proposed amendment changes including the current code language for accessory residential units and mini-retail businesses with proposed changes outlined in the handout provided to the Commission. Discussion ensued regarding ADUs currently permitted as a conditional use and the change allowing ADUs outright; criteria required to conform to specific standards; ADUs defined in the Code and the requirement to meet historical standards in historical districts; street improvements and the need for additional housing; converting multi story homes and non-conforming structures and legitimize any structure interested in utilizing an ADU and the standards required.

Atherton commented that he likes the ability to convert a dwelling or structure; however, shared his concerns regarding ADUs on small lots and the possible complications.

Hughes shared that setbacks on small lots may restrict a detached ADU.

Allen shared he doesn't view the ADUs to be a concern. This could help assist people who otherwise cannot afford to live in Roseburg due to the serious housing shortage.

Cowie reminded the Commission that ADUs are required to meet standards. Hughes asked if a driveway is required of an ADU. Cowie replied no; however, if a driveway is proposed then driveway paving standards would be required.

The discussion concluded and Cowie asked for the direction of the Commission if they are in favor of the Land Use Code Text Amendments as a recommendation to the City Council. Consensus of the Commission present were generally in favor; however, they recommend waiting for the absent Commissioners to be present and to take this action to the Planning Commission public hearing again at a later date.

### **Mobile Vendors –**

Lazur shared that mobile vendors have become increasingly popular over the last decade, specifically Food Trucks. Food Trucks are currently regulated by our code as a Temporary Use, which is processed as an administrative action in which we provide notice to surrounding property owners within 100 feet which potentially subjects the proposal to a public hearing. The entire process takes approximately 45 days to complete on average. Furthermore, each Temporary Use Permit that is applied for only lasts a year which would require the applicant to process the same permit again 10 months later. According to city business registration records, there were 11 new food trucks registered in the last year. As you can see, the regulatory process coupled with the number of applications we receive creates a strain on staff and the businesses themselves. Therefore, the intent of this code revision is to streamline the permitting process while ensuring that basic health and safety regulation are met to allow staff to focus on outreach and customer service rather than the processing of applications. This year to date 11 food trucks have filed a business registration with the City.

### **DIRECTOR'S REPORT –**

Cowie shared the CDD has processed a subdivision, single family homes on Lookingglass and Military Avenue. There have been pre-application conferences regarding proposals for multifamily dwelling units and apartment type units. Our department has been fielding a lot

of unique development proposals. There are a couple of project proposals from Neighborworks Umpqua that are dependent based on federal grant funding.

**BUSINESS FROM COMMISSION** – none

**ADJOURNMENT** – The meeting adjourned at 8:30 pm. The next meeting is scheduled for Monday, August 6, 2018.

Chrissy Matthews  
Department Technician

# CITY OF ROSEBURG PLANNING COMMISSION AGENDA ITEM REPORT



---

**File No. CPA-18-001**

**Meeting Date: August 6, 2018**

**To:** Roseburg Planning Commission

**Completeness Date:** 7/2/2018

**From:** John Lazur, Assistant Planner

**120-Day Limit:** 10/30/2018

**Request:** Comprehensive Plan Amendment from MDR to COM

---

## **ISSUE STATEMENT AND SUMMARY:**

Applicant Mark Garrett, acting on behalf of Ken & Joanne Debell and Windigo Pass, LLC, has requested a Comprehensive Plan Amendment (CPA) of a 2.06 acre portion of a lot located at 131 Taft Drive. The lot currently has two Comprehensive Land Use Designations, Commercial (COM) and Medium-Density Residential (MDR) and is subject to the zoning jurisdiction of Douglas County. The applicant wishes to apply the MDR designation to the western 2.06 acres, which is currently designated COM. The eastern 0.23 acres designated as MDR will remain unchanged. The subject property has frontage on NE Stephens Street to the west, Taft Drive to the north, and Club Avenue to the south. The applicant is proposing the Comprehensive Plan Amendment to permit the development of additional apartments on the property.

## **OPTIONS:**

- Adopt proposed or modified Findings of Fact recommending approval of the Comprehensive Plan Amendment request.
- Continue consideration of the request.
- Adopt Findings of Fact recommending the City Council deny the requested Comprehensive Plan Amendment.

## **CONCLUSION/RECOMMENDATION:**

Based on the information provided by the applicant and in the Findings document, staff finds the proposed CPA is in keeping with the criteria provided in Roseburg Municipal Code Title 12, will not conflict with the Statewide Planning Goals, and is consistent with the City of Roseburg Transportation System Plan and Urban Area Comprehensive Plan policies. Therefore, it is recommended the Planning Commission adopt the following motion:

**SUGGESTED MOTION:**

I MOVE TO ADOPT PROPOSED FINDINGS OF FACT AND ORDER RECOMMENDING CITY COUNCIL **APPROVAL** OF FILE NO. CPA-18-001.

**ATTACHMENTS:**

- 1 – Proposed Findings of Fact and Order
- 2 – Applicant's Exhibits 0-7

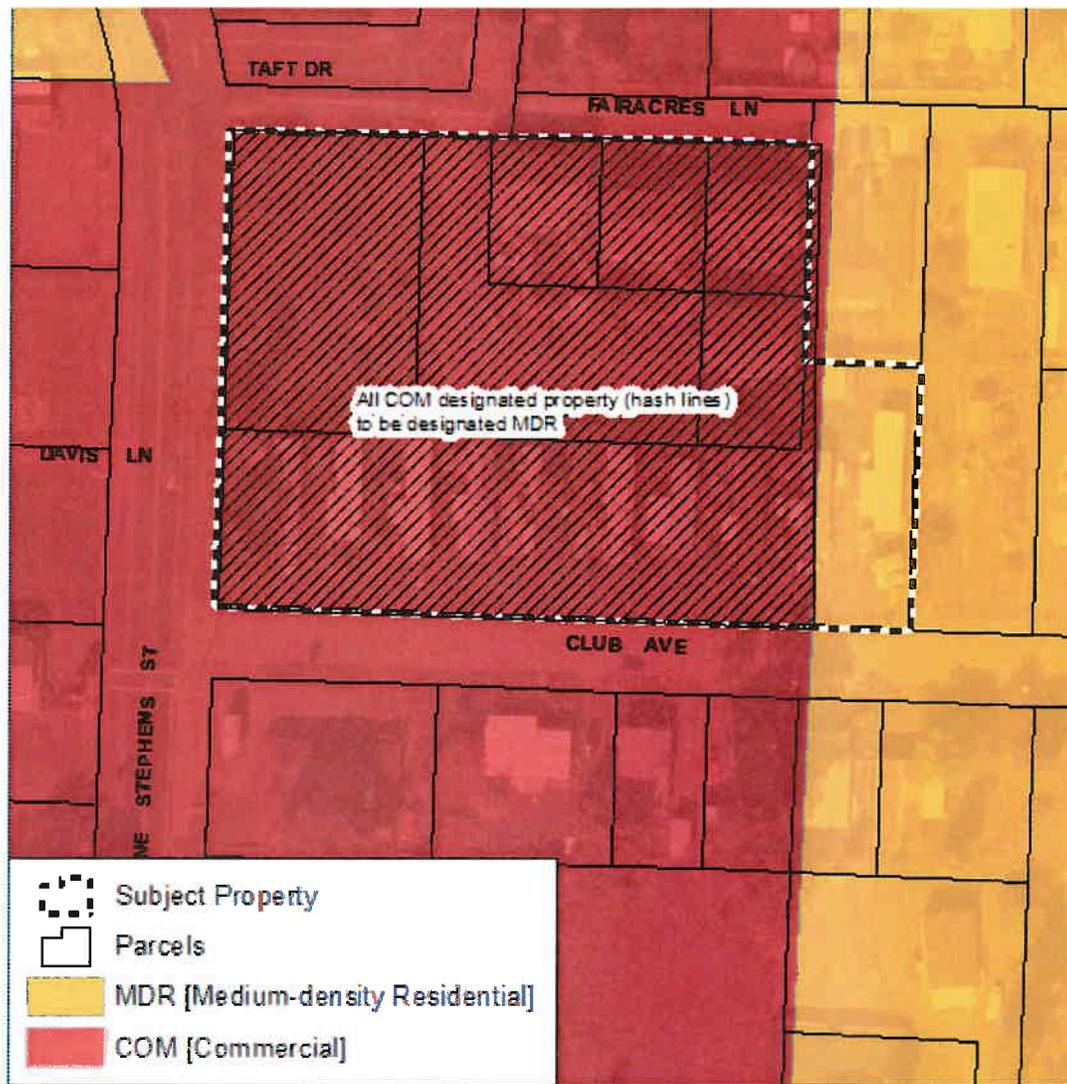
In the matter of the application ) Comprehensive Plan  
by Debell and Windigo Pass, LLC ) Amendment  
 ) File No. CPA-18-001

**BEFORE THE ROSEBURG PLANNING COMMISSION**

**FINDINGS OF FACT AND ORDER**

**I. NATURE OF APPLICATION**

The applicant is requesting approval of an amendment of the Comprehensive Plan Land-Use Map of 2.06+ acres of property outside of Roseburg City Limits but within the Roseburg Urban Growth Area. The proposal is to change the Comprehensive Plan's Land-Use Designation from Commercial (COM) to Medium Density Residential (MDR) for a portion of the subject property identified in the map below.



## II. PUBLIC HEARING

A public hearing was held on the application before the Roseburg Planning Commission on August 6, 2018. At that hearing the Planning Commission reviewed Land Use File CPA-18-001 application for a Comprehensive Plan Amendment and it was made part of the record.

## III. FINDINGS OF FACT

### A. EXISTING CONDITIONS

1. The Planning Commission takes official notice of the Roseburg Urban Area Comprehensive Plan adopted by City Council Ordinance No. 2980 on December 9, 1996 and of Title 12, Land Use and Development Regulations of the Roseburg Municipal Code, as originally adopted July 1, 1984, and re-adopted in Ordinance No. 3497 on May 1, 2018.
2. Notice of the public hearing was given by publication in The News Review, a newspaper of general circulation, at least 10 days prior to the hearing. Notice of the public hearing was mailed to all owners of property within 300 feet of the property 20 days prior to the hearing.
3. Notice of the public hearing was given to the Douglas County Planning Department, in accordance with the Urban Growth Management Agreement (UGMA).
4. The application consists of a request to amend the Comprehensive Plan Land Use map for the subject properties from COM to MDR.
5. The lot may be described as Tax Lots 5500, 5501, 5502, 5503, 5504, 5505, and a portion of 5600 in Township 26 South, Range 06 West, Section 36AA, Willamette Meridian.
6. The lot is surrounded by properties with a Comprehensive Plan Land Use Designation of Commercial (COM) and Medium-Density Residential (MDR). The lot has dual Land Use Designations of COM and MDR.
7. The 2.06 acre portion of the subject property that's presently designated and zoned for Commercial use is partially developed as an apartment complex and partially developed as a manufactured home park. The subject property is divided by two separate land owners of which Debell owns the existing apartments and vacant lot and Windigo Pass is the owner of the existing manufactured home park. The remaining easterly 0.23 acres of property developed as the manufactured home park will remain designated as Medium Density Residential (MDR).
8. The subject property is located within the UGB for the City of Roseburg but is outside of the city limits. Consequently, Douglas County maintains jurisdiction for

zoning administration for the area in which the subject property is located. The City of Roseburg and Douglas County have entered in to an urban growth management agreement which directs the County to carry on the management of development in this area of the UGB for the City consistent with the provisions and policies of the City of Roseburg Comprehensive Plan. Applicant has initiated a request for a zone change on the subject property from the current C-3 zoning to R-2 zoning in conjunction with this proposed plan amendment to accommodate the proposed development of multiple family housing on the site. The application for zone change will be processed separately by the Douglas County Planning Department and will address all relevant standards and criteria as set out in the Douglas County Land Use and Development Ordinance for a zone change in cooperation and coordination with the City of Roseburg.

B. PROPOSAL

The proposal is to change the Comprehensive Plan Land Use Map as it pertains to the western 2.06 acres of the subject property in order to match the current Medium Density Residential designation (MDR) that has been applied to the eastern 0.23 acres of the subject property.

C. AGENCY COMMENTS

No agency comments were received as of the writing of this staff report.

D. PUBLIC COMMENTS

The Community Development Department notified all owners of subject properties per ORS 197.610 and RMC 12.10.030 and received no letters of remonstrance as of the writing of this staff report.

E. ANALYSIS

Comprehensive Plan Amendment applications are required to satisfy approval criteria contained within Title 12, Land Use Development Regulations of Roseburg Municipal Code Section 12.10.030.

F. REVIEW CRITERIA

Pursuant to RMC 12.10.030 the following criteria must be demonstrated as being satisfied by the application for approval of the Comprehensive Plan Amendment:

- a) **That the amendment complies with the Statewide Planning Goals adopted by the Land Conservation and Development Commission, pursuant to ORS 197.240, or as revised pursuant to ORS 197.245.**

**STATEWIDE PLANNING GOALS:**

***Goal No. 1 - Citizen Involvement - To ensure the opportunity for citizen involvement in all phases of the planning process.***

**Finding:** The City of Roseburg and Douglas County have an adopted and acknowledged Comprehensive Plan for the Roseburg Urban Area. In order to implement the Comprehensive Plan, the City has adopted the Land Use and

Development Regulations within Roseburg Municipal Code (RMC). Within RMC the City identifies procedural requirements for processing land use actions, including notification and hearing procedures. The notice procedures guide the general public through the land use process within the City, as well as through provisions that meet State of Oregon Revised Statutes (ORS).

Roseburg also has an established Planning Commission that has the responsibility to act as the conduit to the City Council on land use matters. The Planning Commission is selected through an open, well-publicized process and the Commission may include one member who resides outside the city limits.

The City of Roseburg provided mailed notice of this application as mandated through ORS requirements and RMC, as well as publishing the notice in the News-Review, a newspaper of general circulation. A public hearing was held in order to provide an opportunity for interested citizens to be involved, provide comments and present issues, influence the Commission and eventually the Council, provide technical information, and/or provide information regarding conditional approval.

**Goal No. 2 - Land Use Planning - To establish a land use planning process and policy framework as a basis for all decisions and actions related to the use of land and to assure an adequate factual base for such decisions and actions.**

### ***Part I - Planning***

**Finding:** The City of Roseburg has adopted a Comprehensive Plan, which is "acknowledged" by the State of Oregon. This Plan is coordinated and adopted by Douglas County for the unincorporated area located within the City Urban Growth Boundary (UGB). In addition, the City of Roseburg and Douglas County have adopted an Urban Growth Management Agreement (UGMA) that more specifically identifies process and policy framework for urban area issues and coordination within the unincorporated areas. These properties are within the UGB and within the City's jurisdictional boundaries for the proposed action.

Implementation of the Comprehensive Plan is accomplished through the adopted Roseburg Municipal Code (RMC) through the Land Use and Development Regulations. The City's Land Use and Development Regulations have been acknowledged by the State of Oregon and have been amended from time-to-time in order to comply with ORS.

### ***Part II – Exceptions***

The exceptions section within Goal 2 does not apply in this case because no exception has been requested by the applicant.

**Goal No. 5 - Open Space, Scenic and Historic Areas, and Natural Resources - To conserve open space and protect natural and scenic resources.**

**Finding:** The Comprehensive Plan does not list this site within an inventory of natural resources to protect. Extensive inventories were conducted when the Comprehensive Plan and RMC were prepared. These properties were not identified as having any value as open space, as scenic or a natural resource, or as a Historic Resource.

**Goal No. 6 - Air, Water and Land Resources Quality - To maintain and improve the quality of the air, water and land resources of the state.**

**Finding:** The current development and use of the property does not pose any threat to the violation of air or water quality standards. The subject property is situated in an area where the full range of urban services is available, including public water and public sewer service. Furthermore, the City of Roseburg and Douglas County have regulatory measures in place to ensure that subsequent development of the site with urban uses will not result in deleterious or unanticipated impacts on the air, water and land resources of the urban area.

**Goal No. 7 - Areas Subject to Natural Disasters and Hazards - To protect life and property from natural disasters and hazards.**

**Finding:** The subject property has not been identified in any inventory of the area to have the likely potential to be subjected to natural disasters and hazards. The property is flat, above base flood elevation, not located on any fault lines and located in an urban area served by the Roseburg Fire Department. At the time of development, any structures proposed will have to meet applicable development codes to withstand an earthquake event; therefore, development on the property is unlikely to be damaged by flooding, landslide, earthquake, or wildfire.

**Goal No. 8 - Recreational Needs - To satisfy the recreational needs of the citizens of the state.**

**Finding:** The subject property has not been identified as being needed to satisfy any recreational needs. Identified recreational needs have been provided for on other sites within the Roseburg urban area. The proposal will not conflict with goal 8.

**Goal No. 9 - Economy of the State - To diversify and improve the economy of the state.**

**Finding:** Within the Roseburg urban area, commercial and industrial zoning have been applied to lands containing existing commercial and industrial uses, as well as to a limited amount of undeveloped land that is intended to accommodate future commercial and industrial development. The Roseburg Urban Area Comprehensive Plan contains specific policies to ensure that opportunities for economic development are enhanced in the Roseburg urban area. Applicant's property has remained in residential use under its current commercial designation for a number of years. The subject 2.29 acre site is presently designated and zoned to allow commercial uses. The proposed Plan

Amendment will remove the subject site from the urban area's present inventory of commercial land, and will, therefore, reduce potential future opportunities to provide additional commercial development opportunities. However, when evaluating the potential loss of commercial land within the context of actual size of the subject site (2.29 acres) and its ongoing use as significant residential facilities, such potential impact is minimal and insignificant and is in fact more consistent with the development pattern of the area. The subject property, which is presently developed with four four-plex units and a ten space mobile home park, is located in a transitional area between a concentration of existing single family residences to the north and east and commercial uses to the south and west. The properties that lie within the area bordered by Taft Drive, Club Avenue and Stephens Street surrounding Applicant's property include numerous ownerships, the vast majority of which are developed with single-family and multiple-family residential uses. The remainder of the ownerships to the north, south and west are primarily developed with a number of mobile home parks and various commercial uses. The residential use contemplated on the subject property under the proposed amendment will not introduce a new use into the existing development pattern of the immediate area and will provide buffering between the existing residential uses and the more intense commercial uses in the area. Therefore, as a consequence of allowing the property to be developed in the proposed manner contemplated by Applicant, the actual net loss of potential commercial land will not have a significant negative impact on the inventory of available commercial lands within the city and will be consistent with the existing development pattern in the area. On the basis of the foregoing facts and analysis, removing the subject parcel from the present inventory of available commercial land will not significantly reduce or restrict commercial development opportunities in the urban area. The proposed Plan Amendment is consistent with Statewide Goal No. 9.

**Goal No. 10 – Housing - To provide for the housing needs of the citizens of the state.**

**Finding:** The primary purpose of Goal 10, within the context of amending the Comprehensive Plan, is to ensure that sufficient buildable land is available to allow for the full range of housing needs within the UGB to avoid creating shortages of residential land which would artificially restrict market choices in housing type, price range or location. The City of Roseburg Comprehensive Plan requires that population growth be monitored and assessed for impacts on previous estimates of needed housing and the availability of sufficient land for residential use. As previously noted the subject site is presently designated and zoned for commercial use and currently is developed with residential facilities. If the requested Plan Amendment is approved, the new zoning will allow new residential development at a higher density to accommodate the need for housing in the Roseburg area. Consequently, the proposed amendment will have a positive impact on the present inventory of residential land in Roseburg. The City of Roseburg performed a buildable lands inventory in 2006. The inventory indicates that there is a need for approximately 1000 acres of residentially zoned land within the urban growth area. In as much as there is a

significant need in the present inventory of available buildable residential land in the Roseburg area, the conversion of the subject site to residential zoning will have a positive impact on the area's present or future housing stock. Further, applicant obtained a letter from Carol Sabins, owner of Centerpointe Property Management, regarding the acute need for additional housing opportunities in the Roseburg area. Ms. Sabins states, "... our vacancy percentage... has hovered around the 1% mark for the last two years. In truth, we are renting properties before they are vacated... Our population continues to grow, but we have no ability to house them. " (See Exhibit No. 6 - CMP letter following this page). The proposed amendment will promote both the purpose and intent of the Statewide Housing Goal.

***Goal No. 11 - Public Facilities and Service - To plan and develop a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban development.***

**Finding:** Within the Roseburg urban area, public facilities and services are provided by the City of Roseburg, Douglas County and several special districts. Policies concerning the coordination, timing and location of public facilities and services in the urban area are contained within the Public Facilities and Land Use Elements of the Comprehensive Plan. Specific measures intended to implement these policies are contained in various inter-governmental agreements, including the Roseburg Urban Growth Management Agreement. The subject 2.29 acre site is situated in the Roseburg urban area where a full range of public facilities and services are already in place and are adequate to accommodate the types of uses allowed by the proposed residential zoning. Properties within the urban area receive sewer service from Roseburg Urban Sanitary Authority (RUSA). RUSA maintains an existing 6-inch sewer main in Taft Drive and an 8-inch main in Club Avenue adjacent to the subject property. RUSA has indicated that sanitary sewer service is available to the site property from the existing mains for the type of residential development proposed. Water service is provided by the City of Roseburg via the existing 6", 8" and 24" mains in Club Avenue, Taft Drive and Stephens Street respectively. The existing mainlines are along the south, west and north boundaries of the subject property, respectively, and would serve as the logical locations for installing any new service line extensions of sufficient size to serve the contemplated residential development that will occur on the property. These existing facilities are sized to provide the property with a supply of water that is adequate for both domestic service and fire protection. Fire protection service is provided by the Douglas County Fire District No. 2. Existing fire hydrants are located on Club Avenue at its intersection with Stephens Street and on Taft Drive just east of its intersection with Stephens Street adjacent to the subject site. Police services in the area are provided by the Douglas County Sheriff's Department. Street maintenance, storm drainage and street lighting in the area are also provided by Douglas County. Plans for the installation of these and any other on-site and off-site improvements will be subject to review and approval of the Douglas County and the City of Roseburg and any other agency having jurisdiction over public facilities and services in the area. No additional public expenditures for service

and facility extensions will be necessary to allow the development of the property. Any additional facility improvements necessary for Applicant's proposed development plan will be funded by the applicant. Development of vacant and/or underutilized urban parcels that can be readily served by existing public facilities and utilities supports the policy statements of the Comprehensive Plan. On the basis of the foregoing findings, the requested amendment will not adversely impact the present or future provision of public facilities and services in the area. The full range of urban services appropriate for the subject property's proposed residential land use classification is available and can be provided in a timely, orderly and efficient manner consistent with the intent and purpose of Goal 11.

**Goal No. 12 – Transportation - To provide and encourage a safe, convenient and economic transportation system.**

**Finding:** The subject site has frontage on three streets. Stephens Street forms the west boundary of the property and is designated as an Arterial by the Roseburg and Douglas County Transportation System Plans. Taft Drive runs along the north boundary of the property and Club Avenue abuts the south boundary. Both of these streets are designated Local Streets. No access currently exists to Stephens Street, nor is any proposed as part of future development of this site. There are existing access points from Taft and Club which will continue to be used for the residential units. The portion of Stephens Street along the subject property is not constructed to arterial standards; however, Douglas County has an improvement project for the street in progress to be completed in 2019. Taft Drive and Club Street are County-maintained streets with paved surfaces and two travel lanes and curbs. There are currently no sidewalks. These streets are constructed to a standard sufficient to handle volume of existing area traffic and traffic generated by future development of the subject property as set forth herein. Estimates of the average number of daily vehicle trips generated by a specific land use can be obtained from a number of reliable sources; however, the most commonly referenced source for such data is Trip Generation, published by the Institute of Transportation Engineers (ITE). Average daily trip generation rates published by ITE are based primarily on field data obtained from direct observation of actual land use activities. Trip generation rates are reported as an average of vehicle counts taken at numerous sites having the same classification of land use. Trip generation rates are often broken down into specific time frames, such as "Average Daily Trips (ADT)", "Average Peak Hour Trips", and "AM and PM Peak Hour Trips". For most land use activities, including public/semi-public uses, ITE defines an "average daily trip" as a one-way vehicular movement between a single origin and a single destination. To determine how the proposed comprehensive plan amendment will alter the property's potential impact on nearby transportation facilities, a comparison of the number of potential daily and peak hour vehicle trips can be made between the present and proposed zoning, based on trip generation rates reported in the ITE manual referenced above. Applicant will also complete a proposed zone change from C-3 (General Commercial) to R-2 (Multiple Family Residential) with Douglas County on the subject 2.29-acre site

which will facilitate construction of additional residential housing units as set forth on the conceptual site plans included in this application. The subject site proposed will accommodate twenty-eight additional residential units considering site restrictions, area required for parking and maneuvering of vehicles and storage building placement. Eight of those units will be on the Debell property which will generate 53 ADT and the remainder will be from the Windigo Pass ownership. Comparison of the trip generation of the proposed housing versus the other potential Commercial uses demonstrates an overall improvement of potential traffic impacts on the area road system. An auto parts store, for instance, on this site would generate 619 ADT, while the contemplated potential development of new multiple-family residential housing could reasonably be expected to generate an additional 135 ADT on the area road system. Based on the ITE numbers, there will be a significant decrease of potential ADT on the area road system than would otherwise be possible under the Commercial designation. (See Exhibit 7 - Traffic Assessment -i.e. Engineering letter). That being said, there will be an insignificant real increase of 135 ADT in the current level of traffic generated by Applicant's proposal. The most recent traffic counts by Douglas County Public Works were completed in 2016 and 2017, respectively, for Stephens Street which is designated an Arterial (usual traffic capacity of up to 30,000 ADT) and for Taft Drive and Club Avenue each of which are designated a Local Street (traffic capacity generally less than 1,500 ADT). The count on Stephens Street fifteen hundred feet south of its intersection with Taft Street which was taken 2016 showed a traffic count of 9,251 ADT which is well under the identified maximum range for the County Road. The count on Taft Drive at Stephens Street which was taken January, 2017, showed a traffic count of 1,408 ADT which is within the identified range for the County Road. The second count for Club Avenue taken in January, 2017, at its intersection with Stephens Street, showed a current count of 262 ADT which is significantly under the road carrying capacity. The subsequent increase of traffic generated by Applicant's proposal (135 ADT split between Taft Drive and Club Avenue as indicated above) is well within the identified traffic range for these roads. At the present time, public roads in the area are adequate to accommodate both existing traffic and potential future traffic volumes likely to be generated as a consequence of the requested comprehensive plan amendment. Due to the relatively low volume of traffic associated with the proposal, no special traffic controls or other mitigation measures will be required. Based on the functional classification and existing service levels of adjacent and nearby transportation facilities, the proposed plan designation will be consistent with the identified function, capacity, and level of service of those facilities. Nevertheless, specific transportation-related policies and development standards are included with the City's Comprehensive Plan, as well as the County's Land Use and Development Ordinance to ensure that the statewide transportation goal is implemented on a site-specific basis at the time of development. It is Applicant's intent to develop the subject property in full compliance with all applicable transportation-related policies and development standards. The proposed plan amendment will be assured through the application of specific local policies and standards at the time specific development plans for the subject property are formulated and submitted for review and approval. Applicant's proposal, considering the positive

reduction in potential traffic levels as a result of the proposed amendment, will not result in a change in the functional classification of existing or planned transportation facilities serving the area, nor will it result in changes to any existing development standards or alter the functional classification of existing or planned transportation facilities. Neither will it allow types or levels of land uses which would result in levels of travel or access which are inconsistent with the functional classification of near-by transportation facilities, or otherwise reduce the level of service of existing and planned transportation facilities below minimum acceptable levels.

**Goal No. 13 - Energy Conservation - To conserve energy.**

**Finding:** The subject property is situated within the established urban area where its subsequent development will promote the efficient energy-related use of existing and planned transportation facilities. Major public facilities and services are immediately adjacent to the site, thus reducing the energy-related inefficiencies associated with extending such services beyond existing urban development. Furthermore, specific energy conservation policies and development standards are included within the Roseburg Urban Area Comprehensive Plan and the County's land use and development ordinances to ensure that the statewide energy conservation goal is implemented on a site-specific basis at the time the property is developed. The proposed Plan Amendment and Zone Change will not conflict with the Statewide Energy Conservation Goal.

**Goal No. 14 – Urbanization - To provide for an orderly and efficient transition from rural to urban land use.**

**Finding:** As noted the subject property is within the existing Roseburg Area Urban Growth Boundary and per ORS “.....shall be considered available over time for urban uses.” The subject property is in an area that has the potential to be fully developed and is situated along a significant commercial and medium density residential corridor within the Roseburg UGA. This action does not impact any rural land areas. Based on the foregoing findings, the proposed Comprehensive Plan Amendment conforms to all applicable statewide planning goals; therefore, it is not necessary for Applicant to justify an exception to any of the goals.

- b) That the amendment complies with applicable policies of the Comprehensive Plan.

**TRANSPORTATION POLICIES**

**Transportation Development Policy No. 1**

*When practical, the circulation system shall utilize existing facilities and rights-of-way, and on street parking shall be removed in preference to widening streets for additional travel lanes.*

## **Transportation Development Policy No. 2**

*The transportation system should be located and constructed to preserve the character of the neighborhoods. The need for landscaping and noise reduction shall be considered in design.*

## **Transportation Development Policy No. 3**

*Transportation facilities shall be designed and constructed to minimize noise, energy consumption, neighborhood disruption, cost, and social, environmental and institutional disruptions, and to encourage the use of public transit, bike-ways, and walkways.*

**Finding:** As previously mentioned, the subject site fronts on Stephens Street which is designated an Arterial by the Douglas County Transportation System Plan. The portion of Stephens Street along the subject property is constructed with two travel lanes and no curbs, gutters or sidewalks. Douglas County has a road improvement planned for spring, 2019, which will bring the street up to an Arterial standard. The street is constructed to a standard sufficient to handle volume of existing area traffic and traffic generated by future development of the subject property as set forth herein and the slated improvements will further enhance traffic flow in the area.

Applicant's analysis set out under Goal 12 above demonstrates that the proposal on the subject 2.29 acre site from Commercial to Medium Density Residential will result in an overall traffic reduction compared to what is possible under commercial use. The proposed amendment will not result in a change in the functional classification of existing or planned transportation facilities serving the area, nor will it result in changes to any existing development standards or alter the functional classification of existing or planned transportation facilities. Neither will it allow types or levels of land uses which would result in levels of travel or access which are inconsistent with the functional classification of near-by transportation facilities, or otherwise reduce the level of service of existing and planned transportation facilities below minimum acceptable levels. Other public streets in the area are adequate to accommodate both existing and potential future traffic volumes likely to be generated as a consequence of the requested amendment. The proposed change will have a significant reduction in daily traffic associated to it and development of the subject site under the requested zoning and will not result in a significantly higher volume of traffic than would occur if the site were to be developed under its present Plan designation.

## **PUBLIC FACILITIES POLICIES**

### **Public Facilities and Services Policy No. 1**

*Facility and service planning in the Roseburg urban area shall use the Comprehensive Plan as the basis for decisions to ensure that needs of the urban area are met in a timely, orderly, and efficient manner.*

## **Public Facilities and Services Policy No. 2**

*In addition to the physical, economic, energy, and social considerations addressed by other policies in this Plan, the timing and location of urban development within the urban area shall be based upon the current or imminent availability of urban services, particularly public sewer and water.*

## **Public Facilities and Services Policy No. 3**

*The City shall strive to improve the level of cooperation with all agencies of local, state, and federal government in order to ensure the timely, orderly, and efficient provision of all public facilities and services essential to the social, economic, and physical well-being of the urban area and its citizens.*

## **Public Facilities and Services Policy No. 5**

*The City shall not extend water service beyond the urban growth boundary. Extension of City water service to property outside the City limits may only be made upon agreement to annex such property to the corporate City limits at such time as allowed by State statute.*

## **Public Facilities and Services Policy No. 7**

*Wherever possible, new water distribution lines in the urban area shall be looped for all new developments; and, except for cul-de-sacs, all new water distribution lines shall be a minimum of six inches in diameter. The size of any new main is to be based on planned density and type of use designated in the Comprehensive Plan.*

## **Public Facilities and Services Policy No. 8**

*All new residential plans, industrial and commercial development in the urban area shall make provisions for fire hydrants and fire lines where applicable.*

## **Public Facilities and Services Policy No. 9**

*All new developments in the urban area shall have separate storm sewer and sanitary sewer lines. The City shall continue to work toward separation of all storm and sanitary sewer lines in the Roseburg sewer system.*

## **Public Facilities and Services Policy No. 10**

*The availability of adequate sewer service, both in terms of collection and treatment capacity, shall be precondition to a development project.*

## **Public Facilities and Services Policy No. 11**

*Sanitary sewer service shall not be extended outside the urban growth boundary. Extension of City sewer service to property outside the City limits may*

*only be made upon agreement to annex such property to the corporate City limits at such time as allowed by State stature.*

## **Public Facilities and Services Policy No. 16**

*The City shall strive to improve the level of cooperation with all agencies of local, state, and federal government in order to ensure the timely, orderly, and efficient provision of all public facilities and services essential to the social, economic, and physical well-being of the urban area and its citizens.*

**Finding:** As previously mentioned, the subject 2.29 acre site is situated in the Roseburg urban area where a full range of public facilities and services are already in place and are adequate to accommodate the types of uses allowed by the proposed residential zoning. Properties within the urban area receive sewer service from Roseburg Urban Sanitary Authority (RUSA). RUSA maintains an existing 6-inch and 8-inch sewer mains in Taft Drive and Club Street adjacent to the subject property. RUSA indicates that sanitary sewer service is available to the subject property from the existing main for the type of residential development contemplated. Water service to the subject site will be provided by the City of Roseburg via an existing 6-inch and 30-inch mains in the rights-of-ways of Club Street and Stephens Street. The existing mainlines are located adjacent to the south and west boundaries of the subject property, respectively, and serve as the logical locations for installing any new service line extension of sufficient size to serve the residential development that will occur on the property. These existing facilities are sized to provide the property with a supply of water that is adequate for both domestic service and fire protection. Fire protection service is provided by the Douglas County Fire District No. 2. Existing fire hydrants are located on Club Avenue at its intersection with Stephens Street and on Taft Drive just east of its intersection with Stephens Street adjacent to the subject site. Police services in the area are provided by the Douglas County Sheriff's Department. Street maintenance, storm drainage and street lighting in the area are also provided by Douglas County. The design and installation of on-site storm drainage, as well as any interior street lighting, will be the responsibility of applicant at the time of development. On the basis of the foregoing findings, the requested amendment will not adversely impact the present or future provision of public facilities and services in the area. The full range of urban services appropriate for the requested residential land use classification are in place and those services and can be provided in a timely, orderly and efficient manner consistent with the intent and purpose of Public Facilities Policies No. 1, 2, 3, 5, 7, 8, 9, 10, 11 and 16.

## **HOUSING POLICIES**

### **Housing Policy No. 1**

*New residential development shall be coordinated -with the provision of an adequate level of services and facilities.*

## **Housing Policy No. 2**

*Residential land use designation specified in the Comprehensive Plan within the City limits shall be zoned in accordance with such designation.*

## **Housing Policy No. 3**

*The City and County all ensure an adequate supply of land suitable for development which is zoned for low, medium and high density residential uses.*

## **Housing Policy No. 9**

*Owner occupied multi-family dwelling units (condominium and townhouse) shall be encouraged. Commonly accepted ownership patterns such as condominiums or townhouses shall be an outright permitted use in the multi-family zones of the Zoning Ordinance.*

**Finding:** The subject property is outside of the city limits of Roseburg but is inside of its UGB. The site is served by a full range of public facilities. The available facilities include public sewer provided by RUSA, water provided by the City of Roseburg. Streets, storm drain and police and fire protection are provided by Douglas County. A complete discussion of available services is set out above under Goal 11.

Applicant plans to further develop the property for urban residential uses upon completion of the proposed amendment. The site has existing residential facilities located on it that provide needed housing in the rental market. Although private ownership is encouraged in the Plan, this site is committed to alternate housing opportunities in accordance with other provisions of the housing goals of the City. The development will be designed to utilize the existing public road system and the existing public facilities and services in the area. Development of the subject property as a residential subdivision will implement and comply with Housing Policies Nos. 1, 2, 3 and 9 of the City of Roseburg Comprehensive Plan.

## **RESIDENTIAL DEVELOPMENT POLICIES**

### **Residential Development Policy No. 1**

*In designating residential densities throughout the urban area, the following shall be considered;*

- a. The capacity of land resources, public facilities and services.*
- b. The public and private costs of providing necessary urban facilities and services.*
- c. The character of existing neighborhoods.*

- d. *The need to accommodate increasing population within the Roseburg urban growth boundary.*

*Residential uses and neighborhood facilities and services shall be located in relation to each other so as to:*

- a. *Provide convenient and safe access.*
- b. *Encourage the use of all facilities and services by residents.*
- c. *Produce the most efficient and economic land use pattern, and avoid unnecessary duplication of facilities.*

**Finding:** The subject property is situated on the east side of Stephens Street in northeast Roseburg. The site is generally flat with limited vegetative and tree cover on the property. As previously mentioned, all the surrounding properties are within the UGB of Roseburg. Properties lying immediately to the north are designated and zoned for a mix of residential and commercial uses and are primarily developed with single family residences with one plant nursery. The properties to the east are designated for residential uses and are developed with residential facilities. The properties to the south and west across Club Avenue and Stephens Street are designated and zoned for urban commercial and are developed with various commercial facilities. The proposed amendment will promote efficient development of the property by using the existing public access, facilities and services that already exist in the area. The proposed use of the property for residential housing is consistent with the established uses on the property and the character of other urban residential uses in the surrounding area. Public facilities, including sewer, water and storm drainage, are already in place and are adequate to serve the property. The site will be developed in a manner that fully conforms to the applicable development standards for residential uses, including access and internal circulation, signage, lighting, buffering and landscaping. Detailed conceptual site development plans are submitted with this application for the future residential development. The site plan review process at the time of development will assure that the subject property will be developed in the manner represented by the Plan Amendment and Zone Change applications and will further assure that development of the site will fully comply with all applicable development standards.

- c) **That there is a public need for a change of the kind in question and that such need will be best served by changing the Plan designation of the particular piece of property in question as compared with other available property.**

**Finding:** Both the Comprehensive Plan and the statewide planning goals establish the principal that there should be sufficient developable land designated and zoned for residential use to ensure that opportunities for suitable housing are enhanced in the Roseburg urban area. The 2006 Roseburg Buildable Lands Inventory completed for the Roseburg area reveals that

approximately 1000 acres of residential land should be brought into the city to maintain an adequate supply of residentially zoned land. Although the City of Roseburg and Douglas County have approved a few land use changes in recent years to accommodate new residential development, those changes have not been adequate to keep pace with the need projected in the Buildable Lands Inventory. Consequently, the designation of additional land inside the Roseburg urban area is necessary to assure that the urban area's inventory of vacant buildable land zoned for the type of use contemplated by this application (medium density residential uses) is sufficient to encourage or permit opportunities for establishing new residential oriented development in the Roseburg urban area. Consequently, in order to create opportunities for development of new residential uses, it is necessary to change the land use designation and zoning on existing vacant or underdeveloped parcels in suitable locations to ensure that opportunities for such development is not unduly constrained. The subject site is located in an area already committed, in large part, to residential uses. Approval of the proposed amendment will facilitate the continuation of the established development pattern in the area. As a result, the subject property is ideally situated to accommodate urban residential without having a negative impact on surrounding area uses. Based upon the finding above, there is a clear and immediate public need to increase the urban area's inventory of land that is zoned for residential uses. The public need to change the Comprehensive Plan designation and zoning classification on the subject property will best serve the identified public need as compared with other available property in the Roseburg urban area. This conclusion is based on the recognized public need to increase the present supply of buildable medium density residential land within the urban area and by the recognized public benefit resulting from the implementation of numerous Comprehensive Plan policies that are intended to accommodate continued residential growth in the Roseburg area.

#### **IV. CONCLUSION**

Based on the above findings, the Planning Commission concludes that the application meets the criteria for approval in Roseburg Municipal Code Title 12, Land Use Development Regulations 12.10.030.

## V. ORDER

Based on the Findings and Conclusions above, the Planning Commission recommends **APPROVAL** of this application to the City Council.

\_\_\_\_\_  
Ron Hughes, Planning Commission Chair

\_\_\_\_\_  
Date

\_\_\_\_\_  
Stuart Cowie, Community Development Director

\_\_\_\_\_  
Date

Planning Commission Members:

Ron Hughes, Chair

Dan Onchuck

Kerry Atherton

Charlie Allen

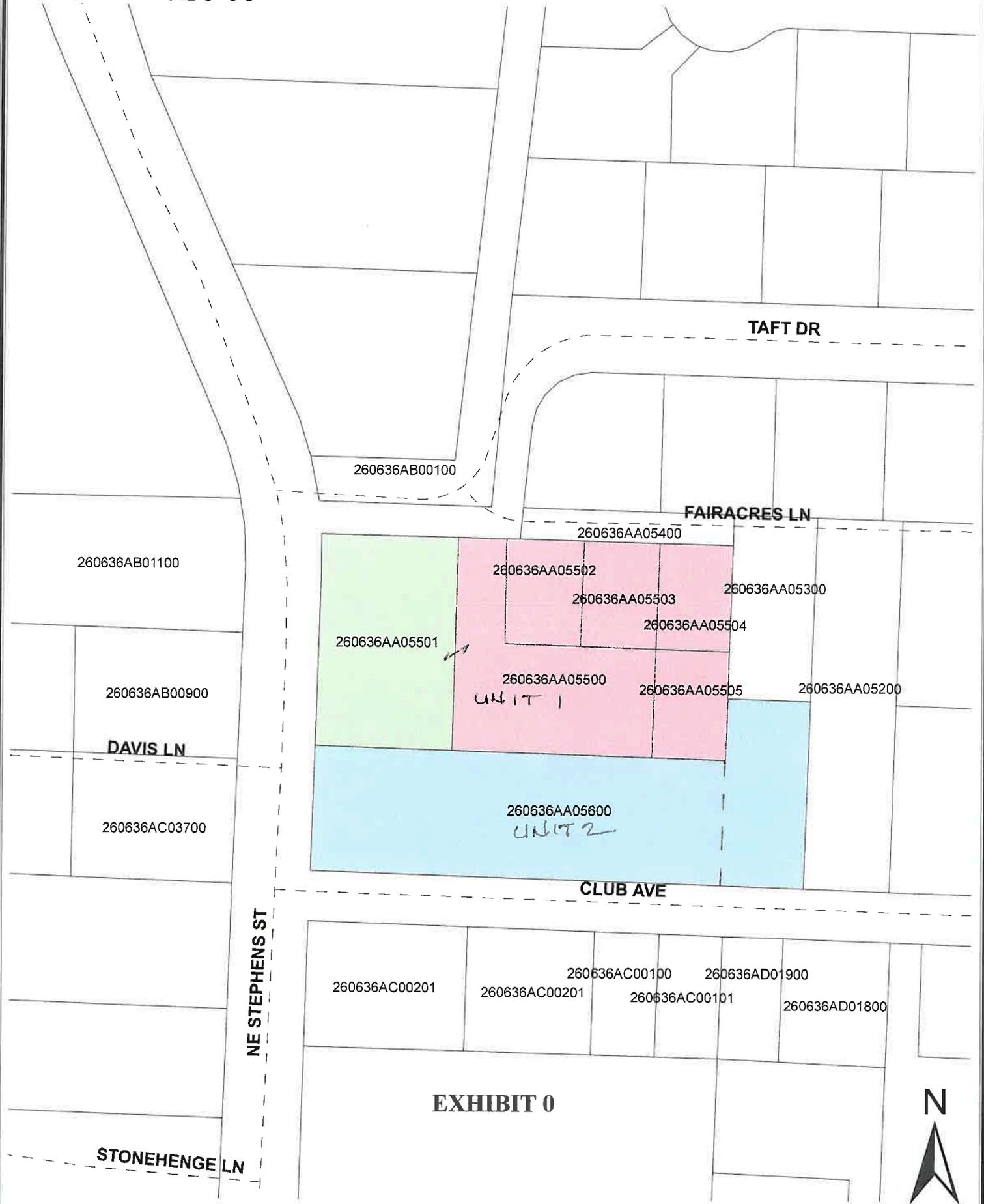
Victoria Hawks

Ronald Sperry

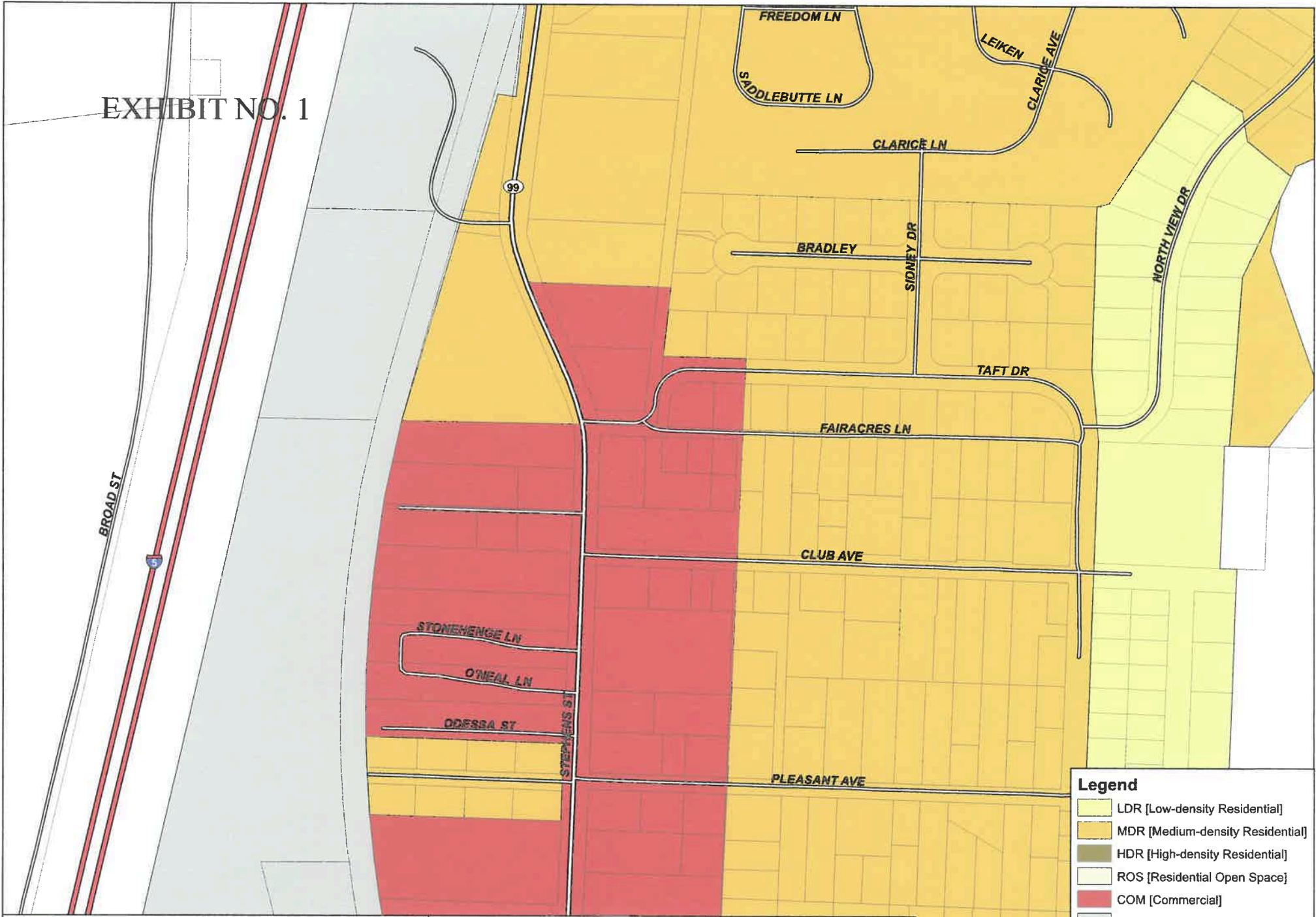
Shelby Osborn

ASSESSOR MAP  
T26S R6W SEC 36

DEBELL & WINDIGO PASS LLC



# EXHIBIT NO. 1

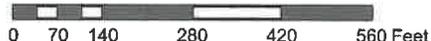


**Legend**

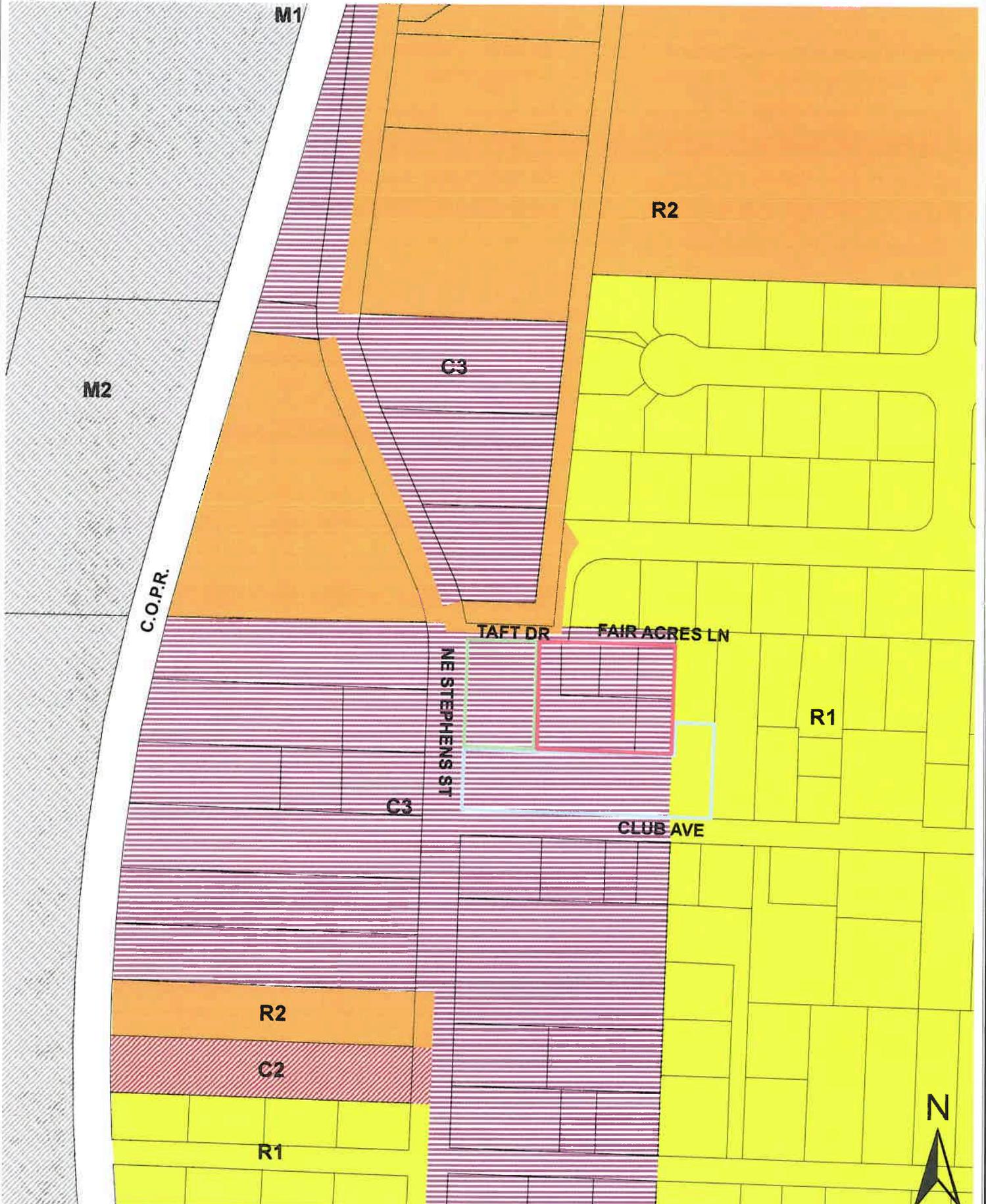
	LDR [Low-density Residential]
	MDR [Medium-density Residential]
	HDR [High-density Residential]
	ROS [Residential Open Space]
	COM [Commercial]
	IND [Industrial]
	PO [Professional Office]
	POS [Parks/Open Space]
	PSP [Public/Semi-public]

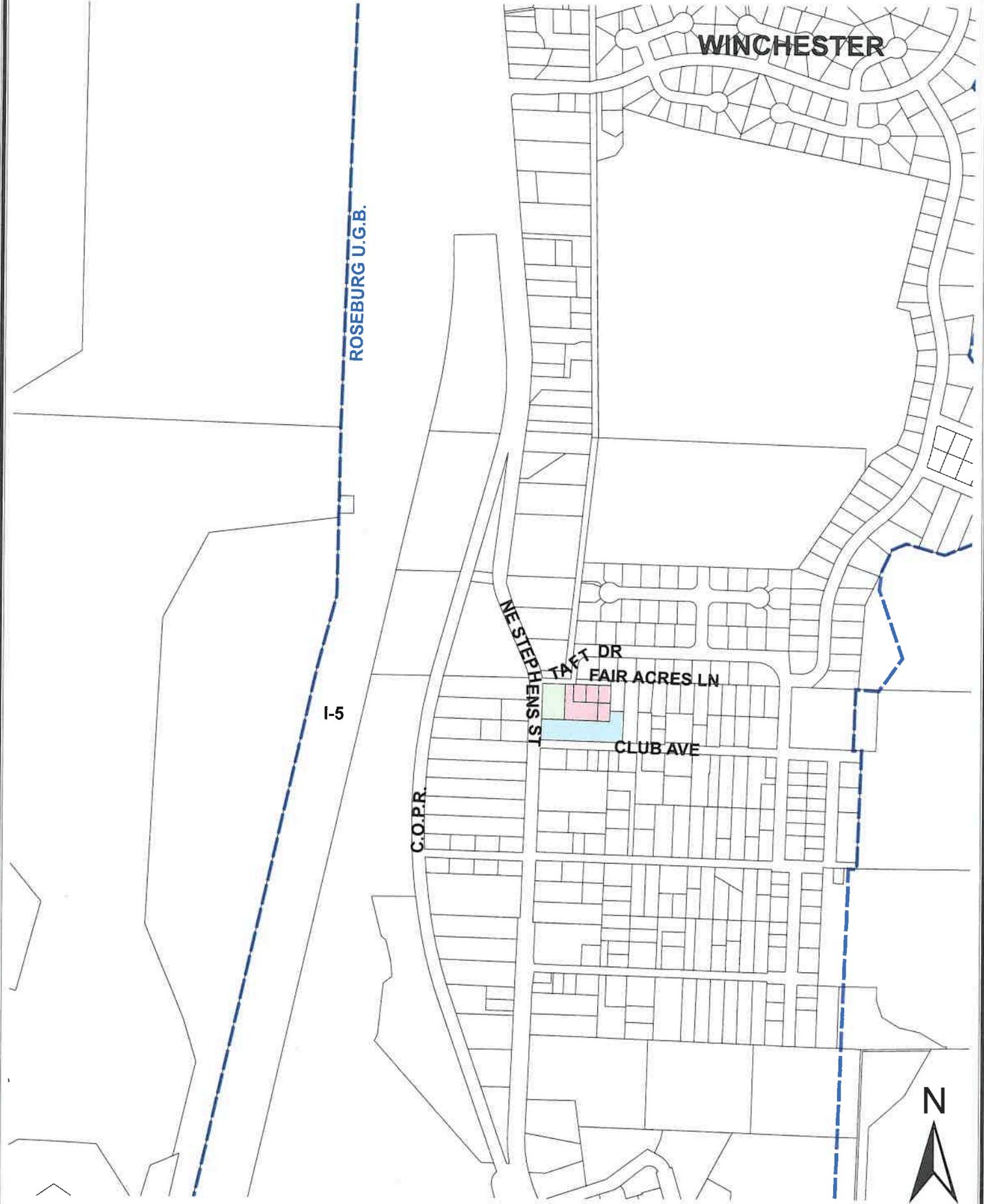


1 inch = 300 feet



NOTICE: This product is for informational purposes and may not have been prepared for, or be suitable for legal, engineering, or surveying purposes. The City of Roseburg is not responsible for map errors, omissions, misuse, or misinterpretation. Consent to Annex and Local Improvement District were mapped based on the current parcel data. Be aware that these agreements typically included entire parcels and that land use actions to adjust property lines (partitions, subdivisions) may have occurred since the original recordings of these documents. Be sure to verify procedures with the City Recorder's Office and the County Assessor. Please notify any inaccuracies and/or outdated information you may find to [ncorrad@cityofroseburg.org](mailto:ncorrad@cityofroseburg.org).





# ZONING SITE PLAN - EVERGREEN APARTMENTS

EXHIBIT NO. 4

## PROJECT INFORMATION

SITE PLAN PREPARED BY SAMUEL DEBELL, PE

## SITE ADDRESS

131 TAFT DRIVE, ROSEBURG OR

## ZONING

CURRENT: COMMERCIAL (PER COMP PLAN MAP)

PROPOSED: MULTIFAMILY RESIDENTIAL (R-2)

## BUILDING HEIGHT AND SETBACKS

MAXIMUM HEIGHT: 45'

FRONT: 15'

SIDE: 10'

B/W BUILDINGS: 10'

## PROJECT DESCRIPTION

FOUR (4) EXISTING 4-UNIT APARTMENT BUILDINGS

TOTAL EXISTING UNITS: 16

ADD TWO (2) 4-UNIT APARTMENT BUILDINGS

TOTAL PROPOSED UNITS: 8

TOTAL UNITS: 24

## PARKING

REQUIRED: 1.5 STALLS PER UNIT

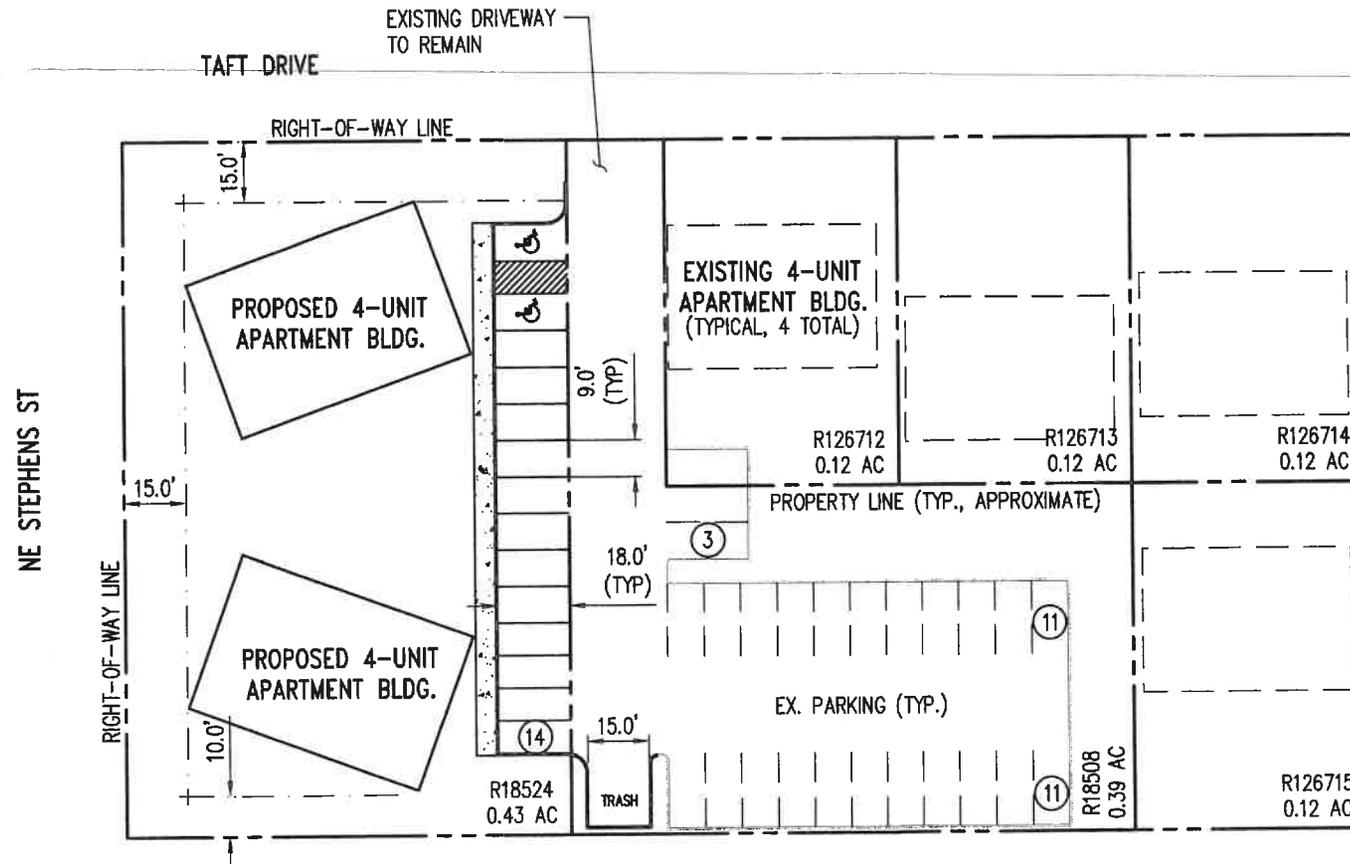
TOTAL: 1.5 x 24 UNITS = 36 STALLS

PROVIDED: 1.6 STALLS PER UNIT

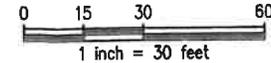
EXISTING: 25 STALLS

PROPOSED: 14 STALLS

TOTAL: 14 + 25 = 39 STALLS



NORTH



Project Name	
EVERGREEN APARTMENTS	
Exhibit No.	Scale
N/A	1"=30'
Date	Drawn/CK'd By
6.13.2018	SJBD

# EXHIBIT NO. 5

## SEITZ PRELIMINARY MULTI-FAMILY LAYOUT

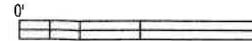
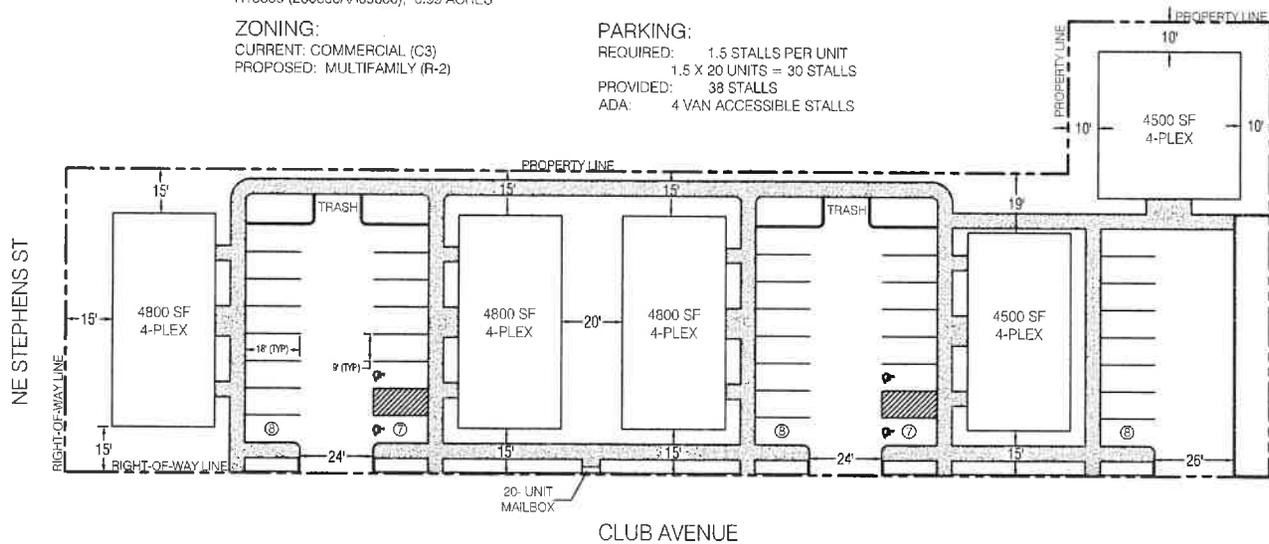
**SITE ADDRESS:**  
175 CLUB AVENUE, ROSEBURG OR

**TAX LOT AND AREA:**  
R18500 (260636AA05600), 0.99 ACRES

**ZONING:**  
CURRENT: COMMERCIAL (C3)  
PROPOSED: MULTIFAMILY (R-2)

**BUILDING HEIGHT AND SETBACKS:**  
MAXIMUM HEIGHT: 35'  
FRONT SETBACK: 15'  
SIDE SETBACK: 10'  
BACK SETBACK: 10'

**PARKING:**  
REQUIRED: 1.5 STALLS PER UNIT  
1.5 X 20 UNITS = 30 STALLS  
PROVIDED: 38 STALLS  
ADA: 4 VAN ACCESSIBLE STALLS



SCALE: 1" = 40'



civil  
structural  
surveying  
architecture  
planning

i.e. Engineering, inc.  
809 SE Pine St  
Roseburg, OR

ieengineering.com

## EXHIBIT NO. 6



### Centerpointe Property Management, LLC

508 W. Agee St, Roseburg, OR 97471

Phone: (541) 672-3434 Fax: (541) 672-4014

Email: [carol@cpm4rent.com](mailto:carol@cpm4rent.com)

June 6, 2018

Mark Garrett  
P. O. Box 2191  
Roseburg, OR 97470

Dear Mr Garrett

In response to your inquiry at our office as to what our vacancy percentage has been over the past few years, I would like to say that it has hovered around the 1% mark for the last two years. In truth, we are renting properties before they are vacated by the previous tenant. Demand has outweighed supply for a long time, and the market is very tight for rentals. It would be safe to say that Douglas County is currently in a housing crisis. There has been no new construction of multi family properties for a few years now, and the influx of migrants moving here has not ceased. Our population continues to grow, but we have no ability to house them. Even the mobile home parks are full, with barely any transitional activity.

Your comment that you were considering building multi family dwellings will be welcomed gratefully by both the property managers, and the prospective tenants being forced to stay in motels as they search for housing. Please advise me when you have the units ready for occupation, as I have a long list of very desperate people looking for a place to call 'Home'.

Sincerely,

A handwritten signature in cursive script that reads "Carol Sabins".

Carol Sabins  
Certified Property Manager



809 SE PINE STREET  
POST OFFICE BOX 1271  
ROSEBURG, OR 97470

(541) 673-0166  
FAX: (541) 440-9392

## EXHIBIT 7

June 13, 2018

Douglas County Planning Department

1036 S.E. Douglas Avenue

Room 106

Roseburg, Oregon 97470

RE: Seitz/Debell Multi-Family Development Zone Change Request

Traffic Impact Memo

The purpose of this memo is to document to Douglas County the anticipated traffic impact or trip count generation for the proposed Seitz/Debell Multi-Family Development, proposed just off of NE Stephens St. between Club Ave. & Taft Dr./Fairacres Ln in the Winchester area north of Roseburg as compared to some other permitted uses in the existing C-3 zoning. The proposed development will be located on seven separate Tax Lots located in 26-06W-36AA. These tax lots are 5500, 5501, 5502, 5503, 5504, 5505, and 5600. Currently, the lot usage includes an undeveloped field, a 10 unit trailer park and four 4-plexes. The current traffic volume is 155 trips per day. The 7 lots total 2.29-acres in size. The proposed Seitz/Debell Multi-Family Development, when fully developed will include approximately 44 units and related site amenities. A zone change is required to allow development of this multi-family complex.

Using the Institute of Transportation Engineers (ITE) Trip Generation Manual, the Class Code for this type of use is Land Use 221 – Low Rise Apartments. The definition for this Land Use Code is:

*“Low-rise apartments (rental dwelling units) are units located in rental buildings that have one or two levels (floors), such as garden apartments.”*

This specific Class Code generates 6.59 weekday trips per Unit. Using this class code, the proposed trip generation of this development will be approximately **290 trips per day**. This is an additional 135 trips per day over and above the existing development.

The existing C-3 Zoning as listed in the Douglas County LUDO has 25 permitted uses. An Auto Parts Store is the 4<sup>th</sup> permitted use on the C-3 Zoning Permitted Uses list. An Auto Parts Store is chosen for comparison to show that the existing permitted uses listed under the existing C-3 zoning would generate significantly more traffic than the proposed Multi-Family Development.



809 SE PINE STREET  
POST OFFICE BOX 1271  
ROSEBURG, OR 97470

(541) 673-0166  
FAX: (541) 440-9392

Family Developments are on the low end of the spectrum for traffic generation as compared to the various developments that are allowed by the current zoning.

#### Comparison Example

Auto Parts Store - The 2.29-acre site could easily accommodate a 10,000 square foot Auto Parts Store with associated parking lot and other normal site amenities. A 10,000 square foot Auto Parts Store (ITE Land Use 843) would generate 61.91 trips per 1,000 square feet of gross floor area for a total traffic generation of 619 trips per day.

The above example illustrates the point that the existing permitted uses in the C-3 zoning would generate significantly more traffic than the proposed multi-family units.

Also of note, per the Douglas County Public Works, the existing ADT on NE Stephens Street is was recorded as 9,251 ADT in 2016. The proposed 135 additional trips per day the multi-family development would generate will have no significant impact on the adjacent transportation system.

In Summary, the proposed development will generate approximately 290 trips per day when developed, which again is only 135 additional trips above the existing development. This is less than the potential trip generation for uses allowed by the current zoning and under the comparative analysis will actually result in a reduced level of traffic generation than what is possible under the current zoning.

If you have any comments or questions, please give me a call at 541-673-0166.

Sincerely,

A handwritten signature in black ink that reads "Derek M. Miller, P.E." in a cursive style.

Derek M. Miller, P.E.

Project Engineer