

cc  
Raul

EXHIBIT 00



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August 6, 2015

MAYOR and CITY COUNCIL  
City of Medford  
c/o Joe Slaughter, Medford Planning Department  
200 South Ivy Street  
Medford, Oregon 97501

RE: ***Additional Materials in support of inclusion of MD-4  
Hillcrest District Urban Reserve***

Mayor and Council Members:

Please find the following materials attached for your review:

1. Letter from Perkins Cole providing Testimony in support of including Hillcrest Enclave (MD-4) in UGB, dated August 6, 2015.
2. UGB Amendment Project Memorandum from CSA Planning, Ltd. to the Council dated August 6, 2015 regarding Goal 14 process.
3. Owners' MD-4 Concept Plan for the Hillcrest District.
4. Letter of support from Julie Brown, General Manger of Rogue Valley Transportation District, dated July 30, 2015.
5. Letter from the Medford Irrigation District regarding MD-4 alternative plan regarding irrigation district requirements, dated May 21, 2014.
6. Letter from Mike Savage of CSA, dated August 6, 2015, regarding discussions with Medford Water Commission and Medford Public Works in reference to the Hillcrest District and utility capacity.
7. Copies of Hillcrest MD-4 display boards presented at this hearing.
8. Draft Surrounding Land / Farm Inventory maps.
9. Hillcrest District Background Information packet.
10. Hillcrest District (MD-4) Urban Growth boundary Transportation Analysis, dated August 6, 2015 from JRH Traffic Engineering.

Additional copies can be made available following the meeting if requested.

Very Truly Yours,

CSA Planning, Ltd.

A handwritten signature in blue ink, appearing to read 'Raul'.

Raul G. Woerner  
Principal

cc. File

August 6, 2015

Steven L. Pfeiffer  
SPfeiffer@perkinscoie.com  
Seth J. King  
SKing@perkinscoie.com

**VIA HAND DELIVERY**

Mayor Gary Wheeler  
Medford City Council  
City Hall  
411 W 8th St  
Medford, OR 97501

**Re: City of Medford Urban Growth Boundary ("UGB") Amendment  
Testimony in Support of Including Hillcrest Enclave (MD-4) in UGB**

Dear Mayor Wheeler and Councilmembers:

This office represents Hillcrest Corporation ("Hillcrest"), the owner of approximately 246 acres of real property generally located east of Foothill Road and north of Hillcrest Road in the MD-4 urban reserve enclave surrounded by the City of Medford ("City"). This letter and its enclosures demonstrate that including MD-4 in the City's Urban Growth Boundary ("UGB") amendment is logical and consistent with the locational factors of Statewide Planning Goal ("Goal") 14. Further, the letter identifies flaws in the City staff and Planning Commission recommendation, which erroneously and without adequate justification, excludes MD-4 from the UGB. Finally, the letter identifies deficiencies in including more remote candidate properties in the UGB.

For these reasons, Hillcrest requests that the City Council modify the recommendation of City staff and the Planning Commission and include MD-4 in its adopted UGB amendment.

**1. MD-4 is the most logical choice for inclusion in the City's UGB.**

MD-4 is an unincorporated rectangle of approximately 276 acres of land that is surrounded on all four sides by the City, i.e., it is the "hole" in the City's doughnut. It is the most centrally located of all candidate properties. MD-4 is already served by, or can readily and efficiently be served by, adequate public facilities and services of all types. Further, Hillcrest is committed to urbanizing this property and has prepared a mixed-use concept plan for MD-4 that is compatible with and supportive of existing development

and furthers regional planning objectives. The fact that MD-4 is primarily under common ownership allows for consistent implementation of this concept plan across the site. There are no disadvantages or adverse impacts to including MD-4 in the UGB. For these reasons, there is practically a rebuttable presumption to urbanize this site, and the City Council should include MD-4 in the UGB.

**2. The locational factors in Goal 14 favor including MD-4 in the UGB.**

The City is required to apply the four locational factors set forth in Goal 14 to consider alternatives and determine which properties to include in a UGB expansion. As explained below, each of these factors favors including MD-4 in the UGB:

- Factor 1 - Efficient accommodation of identified land needs: MD-4 can efficiently accommodate all types of land needs identified by the City, including retail, office, and multi-family and single-family residential. For additional explanation, see page 2 of the memorandum from CSA Planning, Ltd. attached to this letter.
- Factor 2 - Orderly and economic provision of public facilities and services: This factor requires consideration of water, sanitary sewer, stormwater management, and transportation facilities. OAR 660-024-0060(7). It does not involve a consideration of school facilities, and the City cannot rely upon the provision of lands for school facilities as a basis for concluding that this factor is satisfied. As explained in the attached reports from CSA Planning, Ltd. and JRH Transportation Engineering, inclusion of MD-4 in the UGB allows for the orderly and economic provision of public facilities and services as follows:
  - Water: Water service is readily available on all four sides of MD-4.
  - Sanitary Sewer: Sewer mainlines traverse the property. Planned sewer improvements can serve MD-4 and may reduce the marginal cost of these improvements.
  - Stormwater Management: It is feasible for MD-4 to develop with urban uses and manage stormwater drainage at pre-development levels consistent with Medford Land Development Code requirements.

- Transportation: Development of MD-4 will facilitate better connectivity between developed areas of the City. MD-4 is already bounded by major arterials and collectors, which provide ready connections to commercial centers and all Interstate 5 interchanges, without utilizing the congested Highway 62/Poplar intersection. Improvements to Foothill Road are budgeted and programmed for completion, which will further increase capacity in the area. In light of its central location, MD-4 will result in fewer vehicle miles traveled than more remote candidate properties.
- Factor 3 - Comparative environmental, energy, economic, and social consequences: This factor favors including MD-4 in the UGB, primarily because, unlike all other candidate properties, MD-4 will effectively be an infill development. As such, it will be less costly, less impactful to the environment, and more efficient to extend services to the site relative to other candidate properties. Further, development of MD-4 with a town center will provide needed businesses and services to east side residents, thus delivering environmental, energy, economic, and social benefits to surrounding property owners. By contrast, developing commercial uses on a more remote candidate property will be less centrally located and require additional vehicle miles traveled, with attendant increased energy consumption and reduced social well-being.
- Factor 4 - Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB: As stated above, MD-4 is an enclave surrounded on all sides by land within the City's UGB, and it is a considerable distance from MD-4 to any farm and forest land outside the UGB. Therefore, there are no compatibility concerns to farm and forest lands outside the UGB that will result from developing urban uses on MD-4. This factor favors including MD-4 in the UGB.

On the basis of this analysis and the supporting reports, the City Council should find that including MD-4 in the UGB is consistent with the Goal 14 locational factors.



**3. The City staff and Planning Commission recommendation, which excludes most of MD-4 from the UGB, is based upon faulty and unsubstantiated reasoning.**

City staff originally recommended that MD-4 be included in the UGB, but during the course of the Planning Commission proceedings, City staff revised its recommendation to exclude most of MD-4 from the UGB. The Planning Commission adopted staff's revised recommendation. Contrary to applicable law, the City staff/Planning Commission recommendation currently lacks an adequate factual base and, in many instances, includes only conclusory findings that would not withstand scrutiny on appeal.

For example, City staff's analysis of the proximity of the candidate properties to the City is flawed. This analysis awards five points to every property that borders the City limits, yet it overlooks the fact that MD-4 is located near the heart of the City and is surrounded on all four sides by the City, while other candidate sites are much more remote. A reasonable person would not agree that MD-4 and these remote sites have similar proximity. Quite simply, City staff's analysis fails to account for actual differences in proximity between MD-4 and other candidate properties.

Additionally, City staff improperly excluded MD-4 from the UGB on the grounds that it is adjacent to other land in the City that is undeveloped: "When attempting to spread the supply of developable lands around the City it is necessary to consider not only the lands being added to the UGB but also the developable land within the current UGB." Staff Report at p. 147. This statement reflects faulty reasoning in two ways. First, none of the locational factors or other review criteria require "spreading" development around the City, particularly when such spreading is inconsistent with the Goal 14 locational factors. Second, no applicable law permits the City to exclude a property from the UGB on the basis of proximity to existing incorporated property that is undeveloped.

Finally, in its ESEE analysis, the City staff report appears to state the correct objectives, yet fails to correctly apply them. See Staff Report at p. 15. For example, staff extolls the environment, economic, and social virtues of reducing motor vehicle trips by selecting properties proximate to the UGB, yet staff concluded that the property with the best proximity to the UGB, MD-4, should be excluded. See Staff Report at pp. 15, 17. This conclusion is inconsistent with the very objectives identified by the City.

**4. Other properties have greater deficiencies than MD-4.**

Since all of the other candidate properties are more remote and located on the outer fringe of the UGB, they do not possess the same locational advantages of MD-4. Moreover, in many cases, developing these remote areas will not only require costly service extensions but will adversely affect users of existing facilities in the City. For example, as explained in the enclosed JRH Transportation Engineering memorandum, including MD-2 in the UGB will exacerbate congestion concerns at already overcapacity intersections on Highway 62. When deficiencies such as these exist, the City cannot include MD-2 in the UGB at the expense of MD-4.

**5. Conclusion.**


For the reasons stated above, the City Council should find that MD-4 is the ideal candidate property for inclusion in the UGB, and Hillcrest requests that the City Council include all of MD-4 in the UGB amendment. Hillcrest reserves the right to submit additional argument and evidence in this matter, consistent with any open record schedule established by the City Council.

Thank you for your attention to this letter and its enclosures.

Very truly yours,



Steven L. Pfeiffer



Seth J. King

Encls.

cc: Jim Huber (via hand delivery) (w/encls.)  
Lori Cooper (via hand delivery) (w/encls.)  
Client (via hand delivery) (w/encls.)



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## Memorandum

To: Medford City Council

Date: August 6, 2015

Subject: UGB Amendment Project (File No. CP-14-114)

This memorandum is provided on behalf of the landowners of urban reserve area MD-4 (the Hillcrest District) in explanation as to how full inclusion of MD-4 into the City's urban growth boundary compares to all other boundary location alternatives, including any alternative that would include only a portion of the entire Hillcrest District, in consideration of the full application of the boundary location factors of Statewide Planning Goal 14 in accommodating the identified future land need.

Statewide Planning Goal 14 (Urbanization) 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 ensure efficient use of land, and to provide for livable communities."

Goal 14 requires that urban growth boundaries be established and maintained by cities, counties and regional governments, and that establishment and change of boundaries is to be cooperative process between these entities.

### Land Need

The focus of this memo is on evaluating boundary locations following a determination under Goal 14 that accommodation of long range population, consistent with a 20-year population forecast coordinated with affected local governments, cannot reasonably be accommodated on land already inside the urban growth boundary. The goal provides that in determining need, a local government may specify characteristics, such as parcel size, topography or proximity, necessary for land to be suitable for an identified need. Such characteristics have been specified in the adopted elements of the Medford Comprehensive Plan as they relate to housing, employment, and other urban land needs.

The City has already completed an evaluation of its existing land base as Phase 1 of its urban growth boundary evaluation. On December 4, 2014, following a series of properly noticed public hearings, the City Council adopted Ordinance No. 2014-154 which amended its General Land Use Map to reclassify approximately 550 vacant or re-developable acres within the existing urban growth boundary. The findings state that the map amendment affected approximately 3% of the City's existing land base. The Overall Conclusions are stated on Page 51 of the adopted findings (Exhibit A thereto):

*"The basic premises of the Housing and Economic Elements goals are that the City will provide land to accommodate its future residential and employment needs. There are a large number of City Council*



*goals, policies, and implementation measures that support intensification and that spring from a single simple concept of urban growth: the efficient use of land resources. The underlying rationale for this affirms that utilizing existing infrastructure is a better choice in terms of long-term maintenance costs for the City."*

The decision was noticed as a comprehensive plan change that may be appealed pursuant to ORS 197.830 within 21 days of the mailed letter of notice. No appeal was filed.

After increasing planned capacity within the existing urban growth boundary, the City commenced its external area review and - according to the proposed staff findings in Exhibit B of the UGBA Commission Report supplement - determined that an additional 637 acres of employment land outside the UGB are needed (site size and types not specified therein) and that 1,032 gross acres of land outside the existing UGB are required to meet its needs for residential and public and semi-public land. Additional land (153 gross acres) is identified as needed outside the existing UGB for neighborhood and community parks. The Planning Staff and Planning Commission have recommended some adjustment to reduce residential land need down to 879 gross acres. The City is also requesting inclusion of two large wildland park areas that it now owns which are intended to provide recreational and open space opportunities for the City rather than general urban residential or employment land needs over the 20-year population forecast. The report does not identify any other specialized land needs which would require a more limited locational analysis (e.g., rail dependent uses) to satisfy a very particular need.

An understanding of the identified land need is necessary to conduct a location evaluation of an alternative boundary locations and to identify and appropriately size the external study area to provide for meaningful comparisons.

### **Evaluating Alternative Boundary Locations Concerns with Process to Date**

Establish a study area first, and then compare alternatives in a meaningful way. Under Goal 14, the location of the urban growth boundary and changes to the boundary shall be determined by evaluation of alternative boundary locations consistent with ORS 197.298 (priority of land to be included) and four location factors specified in Goal 14. Before applying the factors in evaluating alternatives, however, it is necessary to identify a large enough pool of candidate areas to provide for a meaningful comparison in relation to all four of the Goal 14 factors. Studying an area sized only slightly larger than the identified land need would result in a *pro forma* exercise where the outcome has largely been pre-determined. The staff report states that the amount of urban reserve land, which is first priority under ORS 197.298. available for study is 4,488 acres compared to an identified need of 1,516 buildable acres -roughly three times the amount of needed land or 2,972 acres beyond the stated need. Considering that the 1,516 acre need is for "buildable" residential land and "suitable" serviceable employment land, if the available pool of first priority land includes existing development or land



constraints the overall yield could be relatively low. A study of such candidate lands that balances all four of the Goal 14 factors may in any case result in selection of that land. Medford, for example, has repeatedly selected hillside lands to the east<sup>1</sup> in order to avoid the best agricultural lands at the valley bottom to the west and south of the City.

In order to avoid confusing the process of excluding land from further study with the actual comparative evaluation of boundary location alternatives considering all the Goal 14 factors, exclusion factors should be based on established growth policy of the area in a manner consistent with Goal 14 Planning Guideline A-1 as well as Statewide Planning Goal 2, Part I (Planning). The staff report, at Agenda Page 40, explains that only urban reserve land will be studied which is consistent with the Regional Plan agreement. However, the paragraph concludes by stating "All of this land has been identified for future urbanization and the work of determining suitability was done in the creation of the urban reserve, consistent with ORS 195.137-145."<sup>2</sup> That statement misconstrues the scope of work completed for the urban reserve planning. Urban reserve planning requires consideration of whether land is likely to be suitable for accommodating urban growth boundary expansions ten to thirty years beyond the 20-year coordinated population forecast. The urban reserve is intended to ensure that land identified as suitable to accommodate urban needs over the longer term is protected from patterns of development that would impede future urbanization. Because of the longer term, the study area for urban reserves extended up to a mile in many cases. Urban reserve areas, once established, must continue to be managed in the interim as rural lands by the County in a manner consistent with the statewide planning goals.

While the findings of the urban reserve study are related to the Goal 14 factors in the context of the Urban Reserve Planning Rule, and may be instructive as to long term concerns that may have ultimately reduced the size of certain urban reserve areas, it is not correct to presume that the urban reserve planning completed the work of determining suitability for locating the urban growth boundary consistent with a 20-year population forecast. The study area of urban reserve areas was based on determinations that certain lands would likely be suitable up to fifty years out, whereas a study for an actual growth boundary amendment must consider lands that could reasonably be served within twenty years. Those lands in the urban reserve which would clearly be impracticable to service in that period are those that would be appropriately excluded from further study. A City could also appropriately decide that maintaining community separation for a longer period of time would also be in line with the adopted Regional Plan objectives and set parameters for exclusion on that basis. The proximity approach of

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<sup>1</sup> The Hillcrest District was completely encompassed by Medford as a result of a 1990 growth boundary expansion.

<sup>2</sup> ORS 195.137 to 195.143 apply and are available only to metropolitan service districts established under ORS Chapter 268 (meaning Portland's "Metro"). ORS 195.145 requires LCDC to enact rules for Metro urban reserve planning and otherwise just authorizes local governments to coordinate urban reserve plans through Post-Acknowledgment Plan Amendment proceedings. LCDC had, on its own, already enacted an urban reserve rule at OAR 660-021

including all lands within one-quarter mile of the existing UGB for full Goal 14 analysis is a reasonable *inclusion* factor to pass lands along for further study but is not an adequate basis on its own to exclude lands that are otherwise suitable and serviceable from the full comparative evaluation. The City has used of a Coarse Filter point system to assign scores for Proximity and Parcel Size which were then used to exclude low-scoring parcels from full study. That methodology appears to have improperly excluded site that may be suitable based on adopted comprehensive plan provisions. Also, in some cases the scoring maps do not correspond with the written findings in the commission report in the following ways:

- Excluding small parcels that are located within one-quarter mile is more difficult to defend given that both the Housing Element and Economic Element identify parcels under five acres as having redevelopment potential (assigning probability factors) or suitability as small office sites, for example (0.45 acre lots are common per adopted Economic Element of the Medford Comprehensive Plan).
- There is no indication that parcel ownership was investigated to determine to what extent common tract situations exist and, if so, that scoring was adjusted accordingly.
- The Coarse Filter "Parcel Size Score" system requiring at 10 to 35 acres (which could yield 350 SFR-10 zoned dwellings) simply to obtain the median rank "3" out of "5" would improperly exclude land quite suitable for urbanization. By way of comparison, the mutually adopted urban growth management agreement with the county allows for new parcels of 40 acres to be created in the unincorporated urban growth boundary prior to annexation as an appropriate control to preserve urban utility. A 75 acre minimum parcel size is required in the scoring system to earn a maximum score of "5".
- The Commission Report (Agenda Page 51) states that the middle portion of MD-1 and the southeast corner of MD-5 were eliminated from further consideration because they both scored poorly on both proximity and parcelization. However, the Proximity map shows the middle portion of MD-1 to be predominately comprised of high-scoring lots in close proximity the existing UGB. The map directly contradicts the finding. The MD-5 property is a commonly held tract of two parcels approximately 29 acres in total located adjacent to existing residential subdivisions. This tract was given the highest score of "5" for Proximity and Parcel Size scores of "1" for the 4.47 acre parcel and "3" for the 24 acre parcel although both would be highly suitable on their own to accommodate additional subdivision lots. While there may well be other candidate areas that would be selected following a full comparative study under all the Goal 14 factors, the tract clearly has suitability potential worthy of the full study that scoring system would impede. As it happens, the Planning Commission directed that the tract be include in the UGB.



- The gradation for Proximity scoring are abrupt. Parcels must be within 1/10<sup>th</sup> of a mile to earn the highest score, but lose a point at 2/10ths of a mile and so on.

At Page 51 of the City Council's Agenda packet, the report explains a further screening approach intended to assure that a balanced distribution of growth areas will result by passing through candidate area for study spreads out around the UGB to the fullest extent while excluding parcels in large groups that are further away from existing development. That approach leads to a pre-determined "alternative" growth plan that precludes full consideration under all the Goal 14 factors either by alternative scenarios (e.g., nodal development utilizing larger areas for cohesively planned mixed-use communities consistent with the adopted Regional Plan's objectives), and favors inclusion of lands at boundary edges that may be located far away from the heart of the community and/or where a candidate growth area is already located adjacent to active resource land activities (e.g., northerly portions of MD-9). Excluding larger parcels in larger areas from further study also is inconsistent with the scoring methodology that highly favors parcels at least 75 acres in size.

The explanation provided in favor of the balancing approach includes additional rationales that are not supported by factual inquiry through a full Goal 14 analysis of other alternative suitable lands. The findings also do not include any citation or reference to any adopted policies or plan documents in support of excluding other lands from further study based on such a rationale. Comparing the relative costs of expanding out around the entirety of the existing urban land base to scenarios where larger nodal developments may actually indicate that economies of scale provide more advantages in terms of land use efficiency, orderly development, and the remaining factors of Goal 14. Instead, the proposed approach of excluding lands from further study regresses to a predetermined outcome inconsistent with the Goal 14 requirement to consider alternatives under all of the factors.

### **Evaluating Alternative Boundary Locations MD-4 Advantages**

In any scenario of alternatives to be considered, the fact remains that the location of MD-4 deep within the existing urban area makes it uniquely suited to accommodate the City's urban needs efficiently, orderly, in comparatively positive outcomes considering ESEE consequences, and with the highest compatibility with agricultural and forest activities occurring on farm and forest land located outside the UGB. In point of fact, including the Hillcrest District within the UGB will eliminate the existing acute urban/agriculture impacts that have over the course of time resulted from the City's past expansions around and well beyond the property. This urban reserve area will, upon full inclusion, be furthest removed from any active farm or forest activities located on agricultural or forest land located outside the resulting urban growth boundary.

### **Goal 14 Boundary Location - Factor 1 Efficient Accommodation of Identified Land Needs**

#### Goal 14 Factor 1 - Efficient Accommodations of Identified Land Needs

In comparing alternative boundary locations for a major legislative UGB amendment, a Goal 14 Factor 1 analysis would typically evaluate at least the following:

- **Qualitative Land Needs:** Different land needs require different types of lands. These land need types should be specified in the Comprehensive Plan. The City of Medford's Housing Element and Economic Element provide extensive qualitative details that specify the identified land needs for the City. For example, the site requirements for various types of employment lands are specified in the City's Economic Opportunities Analysis. Alternative UGB locations should be evaluated in relation to these qualitative aspects for each land use type in a systematic manner.
- **Geographic Efficiency:** Where land included in the UGB is proximate to lands already within the UGB, *ceteris paribus*, the land that is more proximate to the existing UGB is more efficient because urbanization can occur as a logical extension of lands already within the UGB.
- **Market Factors:** Urbanization occurs as real estate development supply responds to market demands. There are many market factors that can support or detract from efficient urbanization. New real estate development has five fundamental cost components that must be supported by finished product pricing: raw land price, required infrastructure costs, the structural on-site development costs, finance charges and profits (if any). The Goal 14 evaluation process does not require a detailed pro-forma to be developed for each area considered for inclusion. However, a comparison of relative prices and rates of development in areas near alternative UGB locations would provide a meaningful analysis that compares market conditions between potential growth areas.

As explained above, the analysis provided to-date relating to Goal 14 Factor 1 is limited. In terms of the above efficiency considerations, the record-to-date can be summarized as follows:

- The record includes some general descriptions of what lands might be appropriate for what uses. The record includes proposed plan designations for the lands recommended for inclusion which provides some insight into the lands the City believes might be well situated for certain uses. However, there is no systematic comparison of alternative boundary locations according to qualitative land need types that described in the Housing Element and Economic Element.
- The record includes a proximity analysis that was only used in the "coarse filter". This was done to eliminate certain from detailed consideration for UGB inclusion. The record includes no systematic analysis to explain how proximity (that would support a geographically efficient boundary) was applied to the lands identified for detailed study. Nothing in Goal 14 allows Factor 1 to be discarded from further consideration once a handful of distant properties are deemed to be



inefficient. All factors must be continue to be weighed to arrive at a boundary location that balances all the Goal 14 factors including efficient accommodation of identified land needs.

- The only real market factor evaluated in the record-to-date is parcel size and the record indicates it was only used in the “coarse filter”. Parcel size was used as a proxy for economy scale. Larger parcels tend to support larger-scale developments that can take advantage of economies of scale. This analysis suffers from the same problem as the proximity analysis in that the record includes no systematic analysis to explain how economy of scale considerations were applied to the lands identified for detailed study. Nothing in Goal 14 allows Factor 1 to be discarded from further consideration once a handful of small properties are deemed to be too small for efficient urbanization. Moreover, the parcel-size analysis only really speaks to economy of scale which is only one aspect of necessary market conditions to support efficient urbanization.

Ultimately, the Hillcrest District property is well positioned under any rigorous Goal 14 Factor 1 evaluation for the following reasons:

1. Qualitative Land Needs:

- a. For retail commercial land needs, the Hillcrest District includes lands that are visible and accessible from an arterial street and represent an expansion of an existing retail area to support agglomeration. The retail portion of the site is relatively flat to support retail development and in a manner consistent with a town center design, as evidence in the illustrative plan that underpins the Hillcrest District Concept Plan as proposed by the owners in compliance with the Regional Plan standards for the same. The existing ensemble of historic buildings designed by Frank Clark and the newer winery and tasting room functions as a catalyst site to attract business and visitor interest. The District’s arrangement of increasing residential density approaching the town center, guaranteed by the minimum density overlays, increases the market density for greater efficiency of the commercial center (more customers within walking distance). The site is has excellent access to an existing customer and employee base. Two smaller commercial sites are also proposed that can provide services and shopping to the immediate neighborhoods.
- b. For the office commercial land needs, the site includes flat land that represents an extension of the highly successful Hillcrest Office Park immediately across the street. The area is relatively flat. The portion of the site could also serve to meet an elementary school need if that is something desired by the school district. The site is in close proximity to a large customer and employee base that already exists in east Medford.

- c. For medium and high density residential uses, flat locations on major roadways have been proposed to provide economical construction and market awareness.
- d. The single family lands uses are proposed for the portions of the site with more topographic relief because they are the most economic land need types to supply on sloped lands.
- e. Existing urban/agricultural conflicts will go away as the District Plan is developed. Noise from the wind turbines, spray drift, dust, odor, and other externalities from the current agricultural operations will otherwise become more acute as the surrounding developments that have all been approved are built out.

## 2. Quantitative Needs:

- a. The Hillcrest District Concept Plan assures the Committed Minimum Densities required by the Regional Plan will be met. No deferral of this determination is necessary based on this concept.
- b. Full inclusion of MD-4 will result in the full land supply to be available for urban uses as no land need be set aside to accommodate the required minimum 100-foot agricultural buffering standards that will apply to most of the other urban reserve areas that expand toward agricultural lands outside the UGB.
- c. The Town Center employment area requires less overall market area to succeed, and will absorb more rapidly to better serve the overall area through full inclusion of MD-4. The size of the market area is determined by output per store (q), per capita demand (d), and population density (e). Where a store output (q) of 1,000 units with per capita demand (d) and population density (e) of 50 people per square mile, the market area is 5.0 square miles. (That is,  $M = q / d * e$ ). An increase in population density increases demand density. If output per store is fixed, each store needs a smaller market area to exhaust its scale economies. For example, a doubling of population density doubles total demand for the good, so it doubles the number of stores. If there are double the amount of the store, the market area per store decreases to one half its original size (from 5 square miles to 2.5 square miles).

An increase in population density decreases the average travel distances for consumers (the typical consumer is closer to the nearest store), decreasing average travel costs. That, in turn, decreases the slope of the travel-cost curve, increasing output per store. The decrease in transport costs increases the advantages of the now larger scale operations, so output per firm will increase. This basic model simply explains what the Regional Plan policies promoting nodal development - and specifically a town center for the Hillcrest District, already



requires. The proposed alternative to remove two-thirds of the Hillcrest District will impede full implementation of those planned efficiencies. Full inclusion, along with adoption of the concept plan that underpins the Town Center design, will provide a positive signal to the community to invest in homes in the surrounding area which will further an orderly and efficient accommodation of land need utilizing the already available "nearly vacant" residential land that the current recommendation asserts is adequate urban land supply for the area.

3. Geographic Efficiency: The Hillcrest District is the only area considered for UGB inclusion that is entirely surrounded by the existing UGB. Of the Urban Reserve areas over 100 acres, only MD-6 and MD-9 have a higher percentage of land within 0.2 miles of the existing Urban Growth Boundary. The Hillcrest District is the only area where urbanization can occur as an extension of the City along four separate fronts. Inclusion of the entire district would assure full neighborhood connectivity and enhance the collective character of all the surrounding neighborhoods by connecting all to the historic core of the planned town center.
4. With respect to market factors, the Hillcrest District is surrounded by urban development that has been supported by the market. Development in this portion of the City has been occurring and is one Medford's fastest growing areas. This portion of the City has experienced substantial office development, multi-family residential development, and single family residential development since the last periodic review. The overall quality of development in this portion of the City has been high since the last periodic review. The Frank Clark designed ensemble of historic buildings will influence architectural quality throughout the district.

#### **Goal 14 Boundary Location - Factor 2** **Orderly and Economic Provision of Public Facilities and Services**

In comparing alternative boundary locations for a major legislative UGB amendment, a Goal 14 Factor 2 analysis would typically evaluate at least the following:

- Identification of service areas with surplus capacity that could be logically extended to serve additional growth.
- Identification of service areas where existing public facility plans will add surplus capacity or where additional capacity can be added to serve additional lands at low marginal cost. This analysis should also prioritize lands for inclusion that will make the provision of facilities and services to existing UGB lands more orderly or economic.
- Identification of service areas where significant revisions to facility plans would be required to serve future growth.
- The analysis would typically weight facilities according to their relative constraints to urbanization.

- Identification of factors that are expected to increase the cost of on-site infrastructure development such as steep slopes, irrigation canal piping, and stream crossings.
- Identification of infrastructure SDC credits that would be due for new higher order streets and regional facilities that would not be available to off-set other system-wide impacts.
- Written opinion from ODOT on growth areas with the potential to affect state highways.
- Consider orderly transition of jurisdictional transfer from county to city.

The analysis provided in the record to-date developed a scoring system for public facilities. This scoring system was central to the staff recommendation for UGB inclusion. While the scoring developed by staff provides some evidence with respect to public facilities and services, it is lacking in several regards as follows:

- The scoring system did not weight facilities according to their respective constraints to urbanization. For example, the Water Commission's facility plans have adequate financing mechanisms in place to supply all the lands under detailed consideration with water without the need for major facility plan revisions. For this reason, water should not be weighted as heavily because it is not a constraint to urbanization. Goal 14 Factor 2 is only one of four boundary location factors and should not be weighed as four of seven independent factors.
- The analysis does not evaluate storm drainage which is required by OAR 660-024.
- Sewer facility plans and policies were not reconciled between the two service providers within the City to create a fair and equitable evaluation between the two service providers. Also, the sewer scoring failed to evaluate the areas where planned upgrades could provide additional capacity at low marginal cost.
- No analysis of SDC credit requirements due to new higher order transportation facilities or regional facilities is evaluated.
- No formal opinion from ODOT on potential impacts to state highways is provided.
- The analysis asserts that distributed growth around the City will reduce the cost of infrastructure without any relation to available capacity in specific service areas.

**Ultimately, the Hillcrest District property is well positioned under any rigorous Goal 14 Factor 2 evaluation for the following reasons:**



1. The Hillcrest District has arterials on three sides and with projects funded in the Capital Improvement Program significant capacity exists in the transportation system in this area. Limited new higher order streets will be required and SDC's from the project will largely be available for other needed improvements in the City.
2. Water service is readily available on all four sides.
3. Planned sewer improvements will result in adequate sewer facilities and inclusion of Hillcrest may reduce the marginal cost of these planned improvements. Options exist to connect to the E-1 basin with available capacity. Sewer mainlines traverse the property.
4. The site is sufficiently sized to manage storm drainage at pre-development levels consistent with the Medford Land Development Code.
5. The only county owned road facility is North Phoenix Road, which has already been slated for improvement. Consequently, the City will not inherit any local county roads or related cost to improve the same. There are no nearby county roadways that would be affected by induced urban travel from MD-4 due to its location far removed from the outer urban growth boundary.

### **Goal 14 Factor 3**

#### **Comparative Environmental, Energy, Economic and Social Consequences**

Factor 3 is often referred to as the ESEE consequences. This is the most subjective of the four Goal 14 Boundary location factors. What is critical is that the review process, and ultimate findings, explains how these consequences were determined and how that affected the selection of lands for inclusion. Thus, the essential component of this Goal 14 factor is a systematic process of consequence evaluation. Typically, an ESEE analysis takes on a matrix format where the individual comparative dimensions can be evaluated and considered. GIS software is ideally suited to this type of analysis because the matrices can be attributed within the GIS database and mapped to make the consequences visually understandable. The GIS maps provide decision making bodies with a resource to compare and contrast each of the four consequence dimensions and the composite consequences when all four dimensions are combined. Typically the matrix would be populated with consequences that range from strongly positive, positive, neutral, negative and strongly negative along with brief text statement explaining the reasoning for the expected consequence.

The analysis provided in the record to-date is not systematic. The ESEE consequences are laid out in the form of findings. This format is not comparative in a meaningful way. We believe all parties to this proceeding would appreciate the opportunity to provide testimony and evidence to the record with respect to the ESEE consequences. However, meaningful testimony requires the City establish the ESEE consequences analysis structure a priori. Without such a structure, the City will be subject to

testimony<sup>3</sup> that amounts to project advocacy couched in ESEE language. Such testimony is meaningless because it lacks the structure for meaningful comparison of environmental, energy, economic and social consequences required by Goal 14 for alternative boundary locations.

**Goal 14 Boundary Location Factor 4**  
**Compatibility of the Proposed Urban Uses with Nearby Agricultural and Forest Activities Occurring on Farm and Forest Land outside the UGB**

In comparing alternative boundary locations for a major legislative UGB amendment, a Goal 14 Factor 4 analysis would typically evaluate at least the following:

- Identification of Relevant RPS Plan, City Plan and County Plan Elements and Policies related to compatibility of urban land with and protection of farm and forest lands.
- Inventory of farm and forest lands outside the UGB and outside the prospective future UGB's
- Inventory of farm and forest practices on lands outside the UGB and outside the prospective UGB's
- Inventory of Farm and Forest Facility needs
- Identification of potential direct and indirect conflicts between future urbanization and farm and forest practices on nearby farm and forest lands outside the alternative UGB locations.
- Comparative Evaluation of Potential Conflicts

There is no analysis provided in the record to-date regarding the fourth (4<sup>th</sup>) Goal 14 Factor. The record at pages 54 and 55 appear to indicate a comparative impacts and determination of relative compatibility of proposed urban uses within all prospective UGB inclusion areas with nearby agricultural and forest activities on farm and forest lands outside the prospective UGB is not needed because the City and region have adopted Urban Reserves.

- There is nothing in the Regional Plan, Goals, Statutes or other provision of state or local law that explicitly states or suggests the fourth (4<sup>th</sup>) Goal 14 Factor need not be evaluated.
- The Findings at page 54 suggest that Agricultural Buffer provisions of the regional Plan score and consider all candidate lands the same with respect to potential impacts on nearby farm and forest activities. The Agricultural Buffer provisions are required at the time of site planning process once the lands are in the City, used to help offset or mitigate potential conflicts. These provisions seek to minimize direct conflicts

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<sup>3</sup> Such written testimony to-date invariably rank the properties represented by the respective authors as highest. Yet, no uniform methodology has been established by the City.



but this does not mean that any alternative boundary location will result in the same level of indirect impacts and potential compatibility.

- The Findings at page 54 state *"Selecting parcels close in to the existing UGB allows for the continued rural use of the properties nearer the outer edge of the urban reserve. The lower-intensity use of properties in the outer fringe can act as a buffer between urban uses and farm and forest uses outside of the UGB."* There is no factual basis to support this finding. If parcels located far from the existing UGB but not near any farm or forest uses were included the findings would be patently false. The inventory work must first be completed to later be followed by findings that explain how compatibility has been achieved through the selection of an appropriate boundary.

Ultimately, the Hillcrest District full-inclusion alternative is the most compatible under any rigorous Goal 14 Factor 4 evaluation because it is surrounded by the existing UGB and is well removed from any other farm and forest lands located outside the urban growth boundary.

#### **Goal 14 Boundary Location Factors Relation to City's Rationale for Partial Inclusion of MD-4**

In response to the Planning Commission request that staff provide option to reduce the originally recommended acreage for growth boundary adjustment, staff recommended the exclusion of two-thirds of the District which the Planning Commission supported. The stated rationale was that there are approximately 200 acres of "nearly vacant" residential land within a half-mile of MD-4 in the existing UGB - more than any other urban reserve area other than MD-5. Such a rationale was introduced for the first time in the project after the Planning Commission has already closed the record from further public testimony. That MD-4 is surrounded on four sides by the UGB leads to the plain fact that it is located nearer to more land generally within the UGB, built or unbuilt, than any other urban reserve area and will be able to utilize existing urban infrastructure rather than require substantial expansion of systems required elsewhere. The fact that the surrounding area is developed with many neighborhoods and is programmed for more growth typical of past patterns of development actually means that the area needs a town center with a wide variety of housing types and residential densities, and that MD-4 can very efficiently be urbanized in a highly synergistic manner to fully complement the needs of the 20-year population growth in the area.

Inclusion of MD-4, on that basis, is consistent with the City's Overall Conclusions for the Phase 1 Internal Study which strongly favored accommodation of growth efficiently utilizing existing facilities over expansion of systems.

Full inclusion with higher densities will create a tighter more efficient market area to better achieve the Regional Plan requirement that this be a walkable, pedestrian friendly town center. Meeting that requirement ensures that the city will be much better able to achieve its obligations to meet TPR/RTP and other urban efficiency measures. Leaving out the higher density residential

town center core would impede development of the area as a Town Center for many years to come.

#### **Hillcrest District Concept Plan (MD-4)**

The Hillcrest District Concept has been carefully designed to fully comply with the Greater Bear Creek Valley Regional Plan requirements for the same as have been mutually agreed to by all participants to that plan. In this case, adoption of the concept plan as proposed concurrently with the boundary amendment rather than to defer compliance determination as a prerequisite to future annexation will in itself serve to promote efficiency in process and ensure an orderly transition from rural to urban land use.

Our previous submittals provided into the Planning Commission Record were not forwarded to the City Council as part of its agenda packet. Consequently, our prior submittal are enclosed with this communication and we request that the same be included into the official record for your review and consideration.

We request of the Planning Commission - and repeat the request to the City Council - that the Concept Plan as proposed be adopted in lieu of the version prepared by the City. The concept was coordinated closely the planning staff and before the City's initial maps were presented initially in the open house last year. The City staff did revise their version to generally correspond to property owners' proposal but with some differenced. Primarily, the proposed Hillcrest District Concept Plan intends to fix the required 15% open space area required by the Regional Plan Element to a place certain by designating that area as "PS" (Parks & Schools) on the General Land Use Plan Map. This will serve to provide assurance that a cohesive useable open space area is provided near the multi-family area and along the most prominent natural features. An earlier draft concept prepared by the City would also have designated an area as "PS" along the north side of the District but in a more linear manner that would not have provided the same level of utility and benefit to the future residents. This would not obligate the City to accept the area as a public park as it could be managed by an association of owners in similar fashion as the park in the Bella Vista Planned Community adjacent and to the north.

The second requested revision is that the west-east street connecting to North Phoenix Road, as depicted on the City's version, be shown as a collector only to its future intersection with Urano Street which will be a commercial district street connection to Hillcrest Drive (and the existing Hillcrest Office Park). Beyond that intersection to the east, the street as shown on the City's plan would connect directly to the existing Hemlock Drive in the Grayson Heights subdivision. The new street segment between Urano and Grayson Heights will not need to carry the volume of traffic associated with a higher order collector street. Traffic to and from that direction has several alternative "splits" that will distribute well over a local street system. We took great care to avoid inducing higher level of traffic as a shortcut from McAndrews Road through the existing neighborhood to the east. Such a connection is better accommodated by way of Vista Pointe Drive which is a shorter link to the District boundary. A standard residential





street connection should suffice for that purpose, however. Connectivity to Hemlock will be extended as a lower order residential street which would be required by the normal subdivision and development standards of the city.

Lastly, we have proposed that the City include text amendments to its comprehensive plan and development ordinance to create minimum density overlays which would implement the Regional Plan requirement to assure minimum densities will be achieved. That proposal is outlined in our prior attached communications to the City. The current proposal to defer finalization of concept plans as a requirement of property owners prior to annexation will be difficult to implement if the City does not include the appropriate tools in its own plans and development regulations, and for its own application to the County and State to approve the UGB amendment.

Very truly yours,

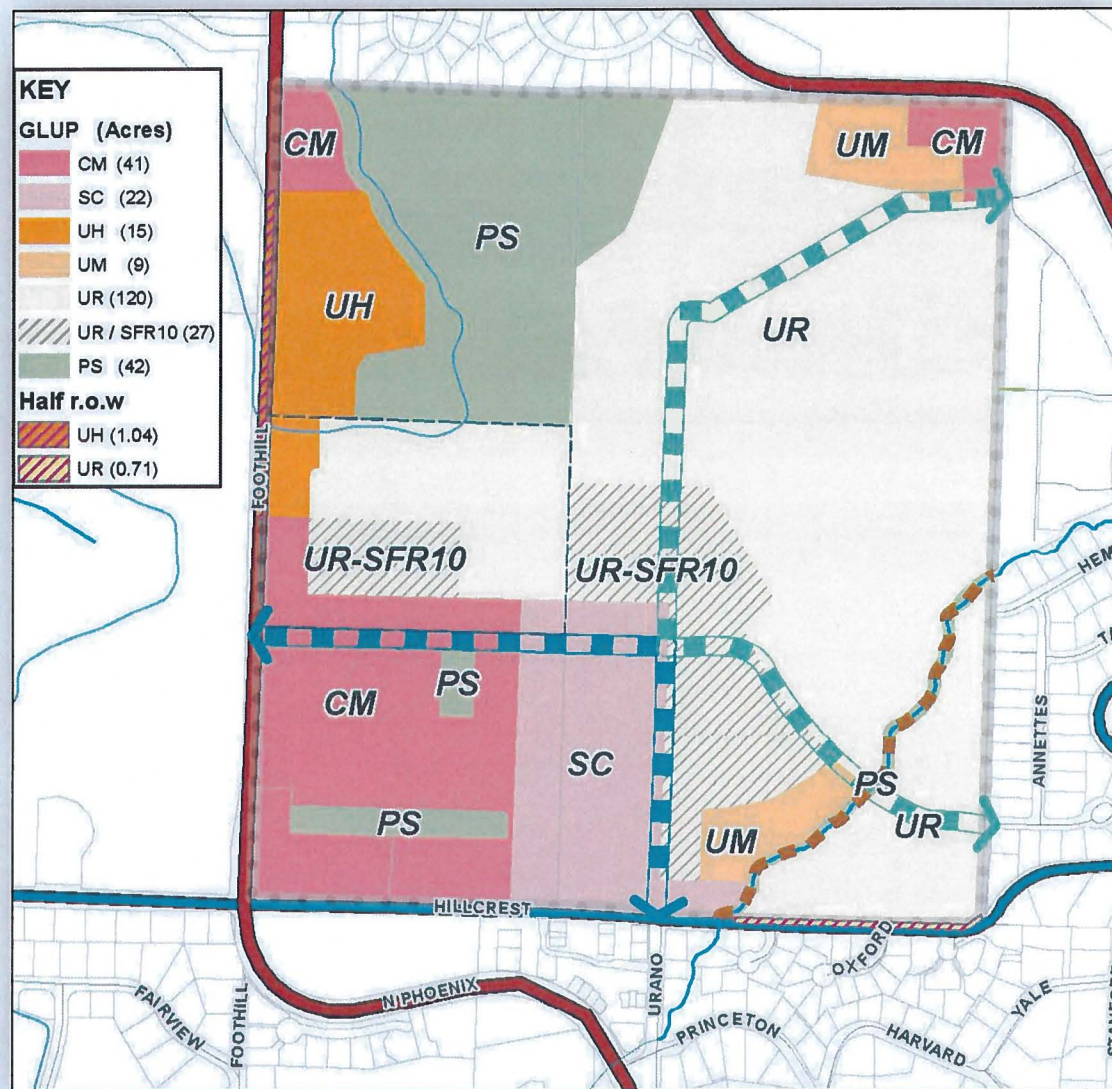
CSA Planning, Ltd.

A handwritten signature in blue ink, appearing to read 'R. Woerner', is written over a horizontal line.

Raul G. Woerner  
Principal

RGW/m

# OWNERS' MD-4 CONCEPT PLAN





3200 Crater Lake Ave.  
Medford, OR 97504  
(541) 779-5821  
Fax (541) 773-2877  
TTY# (541) 734-9292

July 30, 2015

Michael Montero, Principal  
Montero & Associates, LLC  
4497 Brownridge Terrace, Site 202  
Medford, Oregon 97504

**Re:** Conceptual Transportation Coordination-Medford UGB

Dear Mr. Montero:

Rogue Valley Transportation District acknowledges that your firm met with senior transit district staff to coordinate development of the conceptual transportation plan associated with the Hillcrest District Plan property identified by the City of Medford as MD4. The corridor discussed is the regional connection along North Foothills Rd. between McAndrews and Hillcrest Rd. The District agrees that should MD4 develop as a *town center* nodal development designed to promote transit would represent an effective alternative transportation option.

As discussed, transit is an essential element of the MPO's adopted alternative measures intended to reduce regional vehicle miles traveled in the region. These same alternative measures represent an essential element in local and regional land use policy.

The conceptual plans discussed with the District are consistent with Rogue Valley Transportation District's 10-year Strategic Plan for future transit services, contingent upon funding.

Our thanks to your clients for their consultation and commitment to continue working with the District in the development of their conceptual plans being forwarded to the City of Medford as part of its Urban Growth Boundary review process.

Sincerely,

A handwritten signature in blue ink, appearing to read "Julie Brown", is written over a light blue horizontal line.

Julie Brown, General Manager  
Rogue Valley Transportation District



# MEDFORD IRRIGATION DISTRICT

PO Box 70.  
Jacksonville OR 97530  
Office (541)899-9913  
Fax (541)899-9968

Montero & Associates, LLC  
Consultants in Urban Development  
4497 Browridge Terrace, Suite 105  
Medford, Oregon 97504

RE: City of Medford Urban Reserve Coordination

Date May 21, 2014


Dear Michael,

The Medford Irrigation District has reviewed the Concept Plan for the proposed alternative MD-4 Plan.

If we understand your request; to identify any District requests involving the District's canal and related facilities as to future development of lands surrounding the facilities and changes in the land designations. The District will require the canal to be piped by the developer if any housing development is considered on either side of currently open irrigation canal. Public safety issues arise when the lands are populated near the canals, also the ditch banks along the open canals cannot be used for public walk ways, only after the canals are piped and if the landowners agree.

The Medford Irrigation District has participated at the Ag Task force meetings and will continue. We ask developers and cities to communicate with us early on in their development planning so no surprises arise at the last minute.

Sincerely



Carol Bradford  
Medford Irrigation District Manager



**CSA Planning, Ltd**

4497 Brownridge, Suite 101  
Medford, OR 97504

Telephone 541.779.0569  
Fax 541.779.0114

Mike@CSAplanning.net

August 6, 2015

Raul Woerner  
CSA Planning, Ltd.  
4497 Brownridge Terrace #101  
Medford, OR 97504

RE: **Meeting With City of Medford Water Commission (Water) and Public Works (Sewer)**

Dear Mr. Woerner,

Earlier this week I met with Rodney Grehn, Staff Engineer from the Water Commission followed by a meeting with Roger Thom, Utilities Engineer from the Public Works Department. The meetings were to discuss water and sewer serviceability of the Hillcrest District (MD-4). Below is a summary of both meetings.

**Water - Medford Water Commission:**

Scoring, Criteria and Maps:

According to Rodney, the MWC provided Planning staff with the criteria, background maps and scores used in their 'Water Scoring' maps.

Confirmation of criteria; He agreed the criteria relied upon is as stated in the report:

- *The score of 3 or "green" is based on water facilities **directly adjacent** to the Urban Reserve area.*
- *The score of 2 or "yellow" is based on water facilities being one lot/tier further away from the Urban Reserve area than what is listed as a score of 3.*
- *The score of 1 or "red" is based on water facilities being two lots/tiers further away from the Urban Reserve area than what is listed as a score of 1. Additionally a score of 1 is warranted if reservoirs, pump stations, and water transmission mains are lacking. If the Urban Reserve area is in non-serviceable area a score of 1 is also assigned.*

He stated he felt in many instances there really wasn't much of a difference between a 1 and a 2. While I found this statement interesting and do not see how that could be true, I did not inquire further on this topic.

We examined maps for the MD-4 site depicting water pressure zones and water line facilities. He agreed that the majority of the property is within Zone 1 and the remainder is in Zone 2 and that there are water lines either running along or stubbed to the property on all four sides. Our maps depicting water services are accurate and reflect the same facilities illustrated on their maps and system inventory.

While looking at the subject property on his screen, he agreed that water lines were adjacent and that the property is fully serviceable.

We discussed in more detailed manner how the lines would be required to 'loop' back into one another and how the road network should be designed to accommodate the loops.

When asked about why the property was downgraded to a 2 despite water facilities being available **directly adjacent** - which as per their own criteria it should be a 3, he stated he was under the impression most of the property was to remain as Orchard and

that is how he evaluated the property. I explained the concept plan in the record shows the entire property being proposed for development and asked even if there were orchard, how would that change the scoring? He then indicated there may be 'other' evaluation factors not listed in their ranking criteria such as steep slopes and creek crossings. We re-examined the site with an eye toward slopes and crossings and he agreed the site is fully serviceable, but would need to look at a detailed plan showing exactly where roads and lots would be in order to provide detailed comments. I provided the concept plan with roads and the like. He agreed, conceptually the site is fully serviceable. He explained there would be some design amenities such as casings (I forget all the specific improvement descriptions, but they appeared to be minor) needed to accommodate the lines on-site. I asked if those were items the City would pay for and he confirmed that those would be required of the developer. I confirmed that they would therefore be provided at no cost to the City.

Based on our discussion, he agreed the site is in-fact adjacent to water lines and is fully serviceable, so I asked how to go about modifying the score to match their stated criteria. He stated he would not be willing to change any maps or scores unless directed to do so by Planning Staff or the City Council and that he did not want to piece-meal any review.

Nonetheless, a direct application of the MWC's stated objective criteria must necessarily result in a score of 3 (all green) because the entire site is adjacent to and in this instance surrounded by water service lines.

#### **Sewer - Public Works:**

##### Constraints and Capacities:

We discussed a prior meeting a handful of years ago... at a time when we looked fairly closely at the sewer line capacity for East Medford and the sewer lines within the "B" basin serving MD-4 in particular. (Note, Sewer service in Medford is broken into several sub areas or basins. MD-4 is part of the basin titled "B".) We discussed the identified capacity constraints in the B basin downstream, between MD-4 and the main trunk line.

- The 2005 plan (which is the most current adopted plan) calls out a handful of sewer line improvements that are needed in order to meet the future capacity for lands within the UGB as well as future URA lands.
  - I asked if there was a summary or list explaining or inventorying which of those improvements have been completed. He said that would be a good idea but it was pretty much all in his head.
  - We pulled out the 05 Sewer Plan maps and project list then generally discussed the listed projects related to the B basin. Based on what we discussed, approximately one-third to one-half of the needed projects have already been completed. While we didn't discuss the remaining projects in detail, I got the impression the remaining projects would be done within the Planning period. A couple of the most significant needed projects would likely be done at the time of Highway 62 bypass construction.
- General Capacity: He stated that, based on flow monitoring information collected since the 05 Plan adoption - they are not seeing flows anywhere near what was predicted in the 05 Plan. They are much lower. This means there is more actual capacity than initially identified in the 05 plan and their projected deficiencies may not be true deficiencies. He clarified that they will not know that for certain until a new study is performed.
- Plan Update: They are going out to RFP for an updated Sewer Plan this week. He shared that he wished the new plan was in-place prior to the City UGB amendment process so more useful information was available.
- He shared that he worked on scoring of the areas. He ran some generalized calculations on what it would take from a dollar / cost standpoint to serve each Urban Reserve Area. He did not share the actual dollar amounts - just generalized.
- Transition from B basin to E1 basin discussion:





- We discussed the possibility of tying into the E1 basin in order to avoid the downstream constraints identified for the B basin. He said that might be a great idea. We looked at the identified constraints for E1 basin. According to the 05 Plan, there is only 1 short segment of the sewer lines that may be constrained.
- We discussed how we would transition from B into E1.
  - The two basins are adjacent and existing lines at the intersection of Brookdale and Spring Streets are no more than 100 feet apart with very little change in elevation. It is highly feasible to transition from B to E1 at this location, entirely within existing right of way at very little cost.
  - In order to tie into the E1 basin from MD-4, a new line from MD-4 would need to be extended across the Carpenter property, upstream of Brookdale and Spring Street. From a topography standpoint this is very do-able, but will obviously require coordination with the Carpenter property.

I inquired what it would take to examine the ability of E1 basin accommodating MD-4 and other lands upstream. He said we would have to hire our own engineer to have the systems analyzed. I pressed the issue a bit further by asking where exactly to find the base information from which an engineer would rely upon. He then stated their engineers might be able to get some of that information and / or it could come out of the 05 plan - or if it can wait, would come out of their new plan anticipated to be completed sometime in the next couple years.

As stated above, the sewer line rankings / scores were based on the estimated project costs for mitigating the downstream constraints for serving each of the Urban Reserves. IF MD-4 has an alternative, which it sounds like there is strong likelihood it does, that estimated costs would be significantly less and thus the score would be much higher. This alternative is something that would likely not only benefit MD-4 but several other lands in East Medford.

Very truly yours,

CSA Planning, Ltd.

A handwritten signature in blue ink, appearing to read 'Michael Savage', with a stylized, flowing script.

Michael Savage  
Associate

cc. File

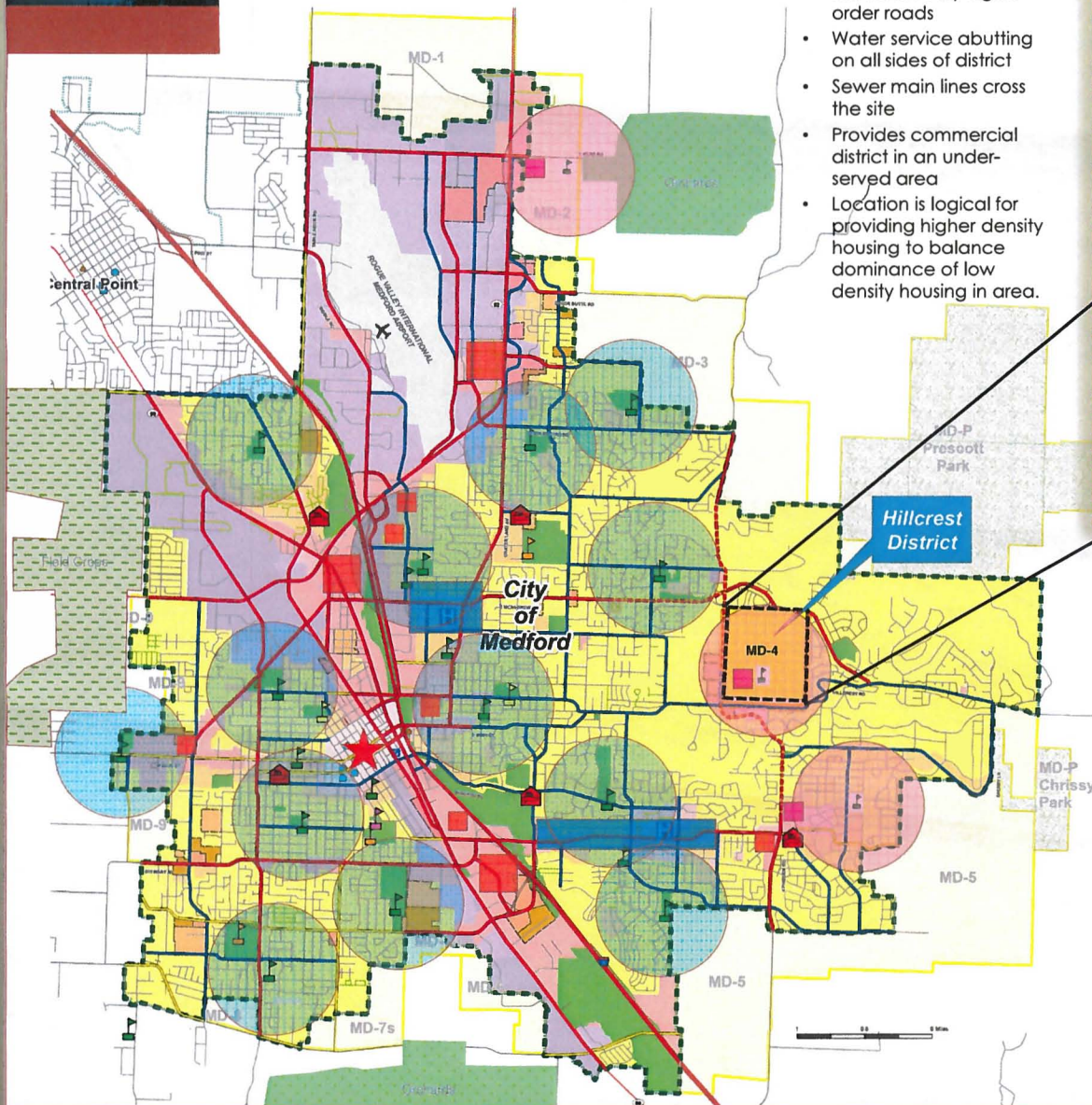
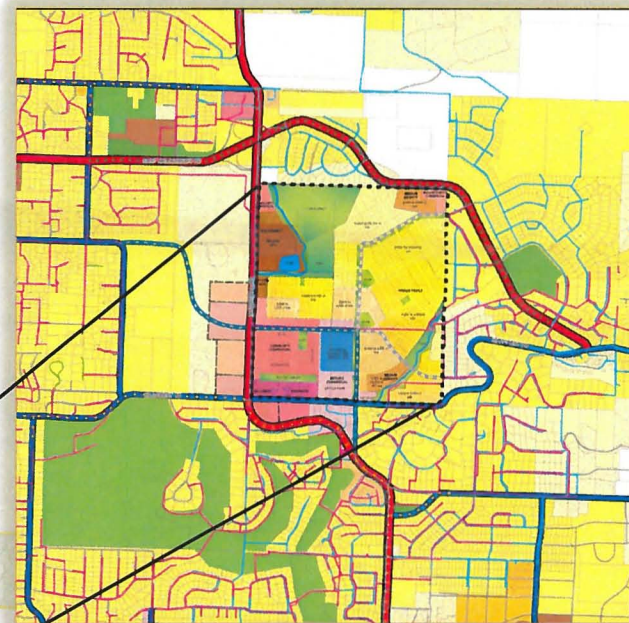


# Hillcrest MD-4

## Proximity is Key

### Hillcrest MD-4:

- Surrounded by higher order roads
- Water service abutting on all sides of district
- Sewer main lines cross the site
- Provides commercial district in an under-served area
- Location is logical for providing higher density housing to balance dominance of low density housing in area.



### Legend

- Existing Regional Commercial Center
- Downtown Medford
- Existing Neighborhood/Community Commercial Center
- Proposed Neighborhood/Community Commercial Center
- Medical Services District

- Airport
- hospital
- Station
- Private Schools

### Public Schools

- Elementary
- Middle
- High School

- Urban Reserves
- Hillcrest Site
- Urban Growth Boundary
- Airport
- hospital
- Station

- Arterial Road
- Collector Road
- Proposed Local Road
- Water Mains
- Sanitary Sewer Mains

- Existing Elementary School Walkable Radius
- Proposed Elementary School Walkable Radius



# Hillcrest MD-4



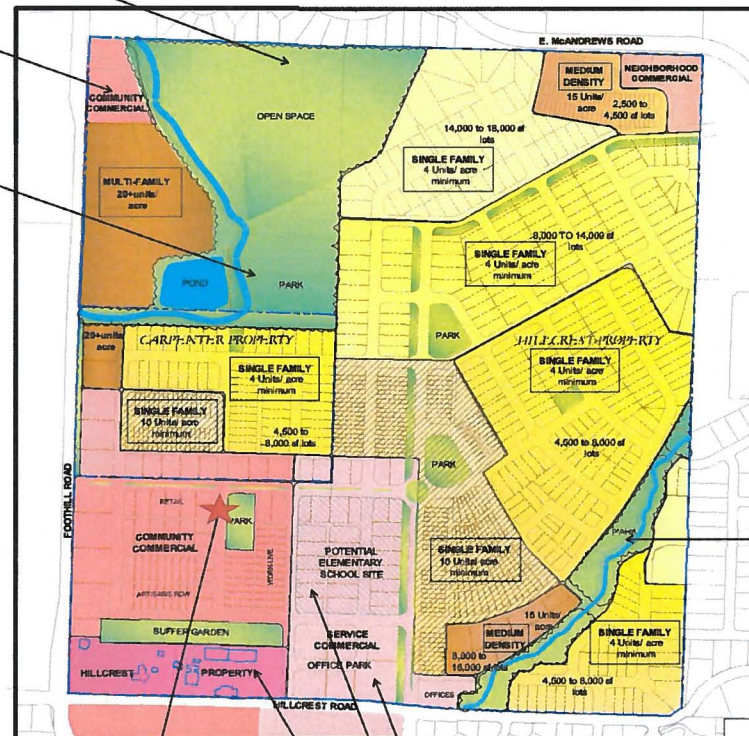
## HILLCREST DISTRICT

- Fully Surrounded by Medford
- Provides Town Center as Required by Regional Plan
- Services Neighborhoods in Four Directions (Infill NOT Expansion)
- Provides Transition from Existing Low Density Neighborhoods to Increasingly Dense Core
- Offers prime locations for future City services, such as fire stations and schools.
- Eliminates Existing Urban/Farm Interface Conflicts Completely
- Open Space Plan will maintain the greenery and feeling of the Hillcrest Orchard.
- Plan has been developed as a total concept. Each part supports and enhances the function of the rest.

Open Space is highly visible to Hillcrest and surrounding neighborhoods

Potential Fire Station Site

Neighborhood recreational space



### HILLCREST VILLAGE CENTER

The Hillcrest Village Centre is the focal point of the new Hillcrest District neighborhood, offering restaurants and neighborhood services.

Office Park extends existing Hillcrest Office Park

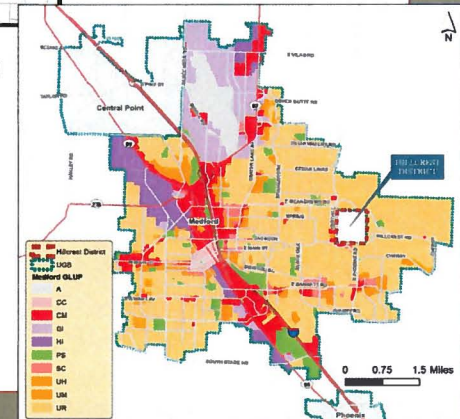
Potential for a 5 to 8 acre School Site

Historic Center and Winery

## HOUSING

- District includes a wide variety of housing types to meet Medford's RPS density requirements
- Residential density increases as it gets closer to the Village Center
- Site contours and natural features are the basis for the development layout.

Greenway path connects to Oregon Hills park





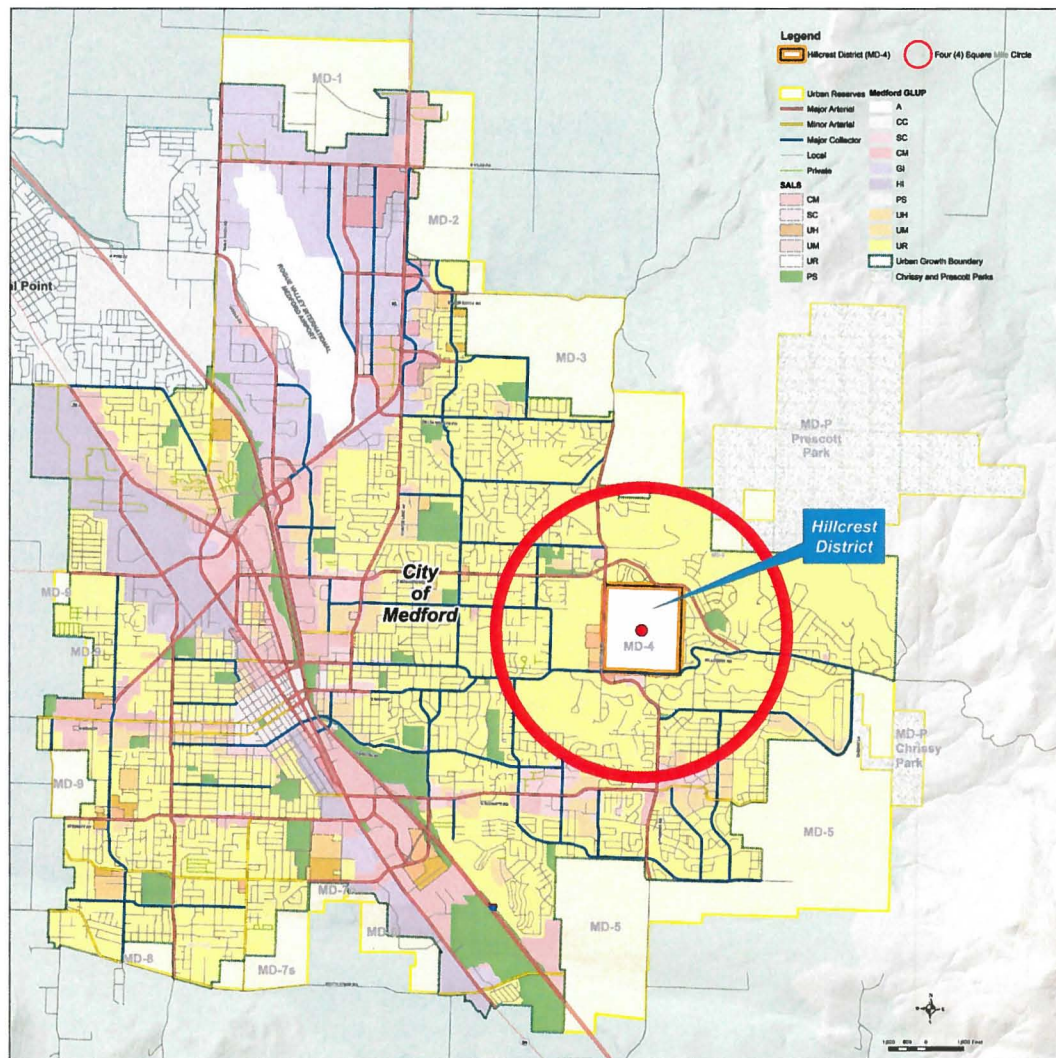
# Hillcrest MD-4

## An **ISLAND** Within The City

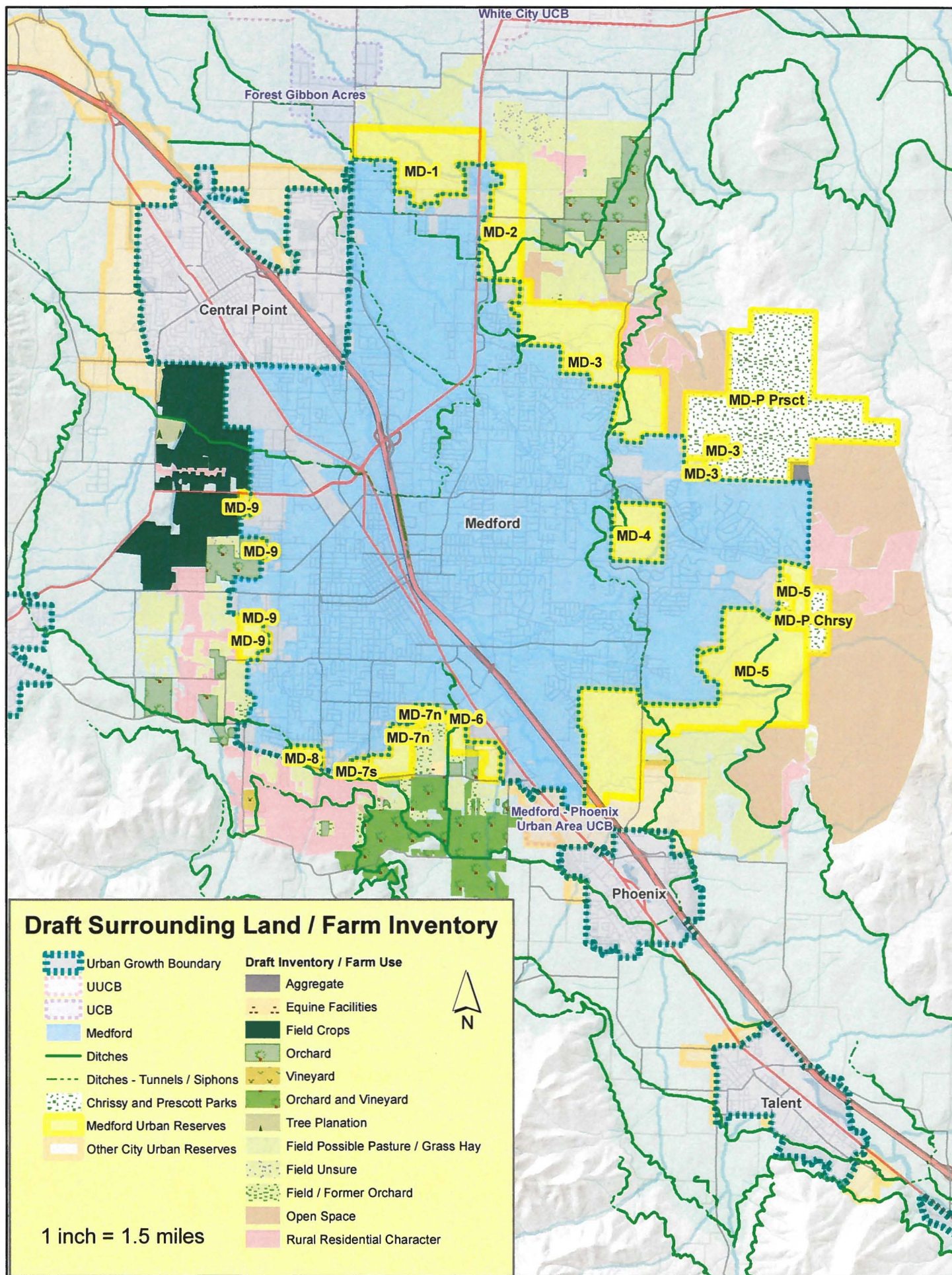


### HILLCREST DISTRICT

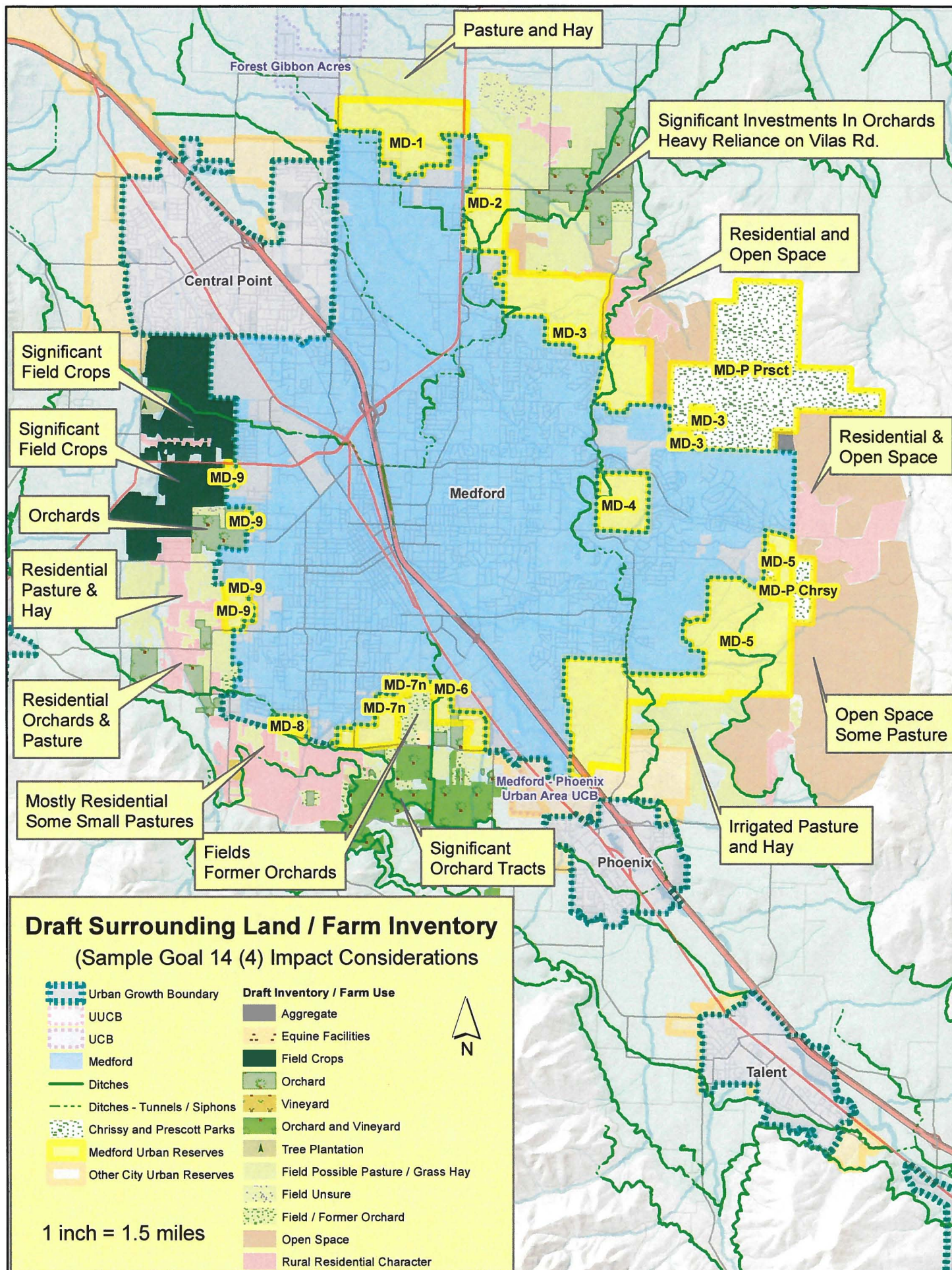
- Fully Surrounded by Medford
- Center is More Than One Mile From Outer UGB
- Circle Centered on MD-4 Includes More Than Four (4) Square Miles of UGB Land.



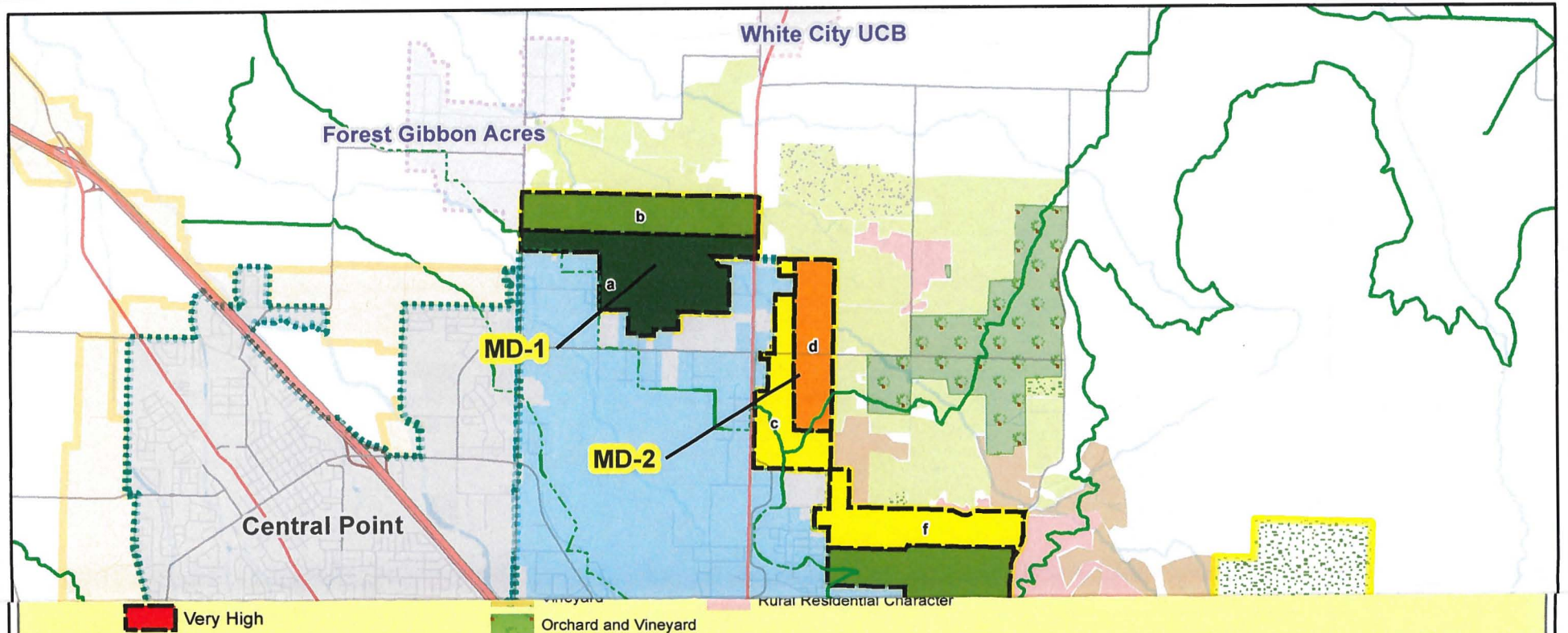












1 inch = 1 miles

NAME	ID	Potential Conflict Ranking	Conflicts Explained (Examples)
MD-1	a	Very Low	Not Adjacent to Farm Uses; Already Fairly Heavily Developed; Some Potential for Storm Runoff to Affect Crops; Little or No Shared or Thru Access
MD-1	b	Low	Adjacent to Pasture and Hay; Potential for Urban Storm Runoff to Effect Crops; Little or No Shared or Thru Access
MD-2	c	Moderate	Near Pasture; Grass Hay and Horse Facilities; Potential for Increase Urban Traffic on Vilas Road Where Large Investments in Orchards Occur and Rely on Vilas for Farm Activities
MD-2	d	High	Adjacent to Pasture; Grass Hay and Horse Facilities; Strong Potential for Increase Urban Traffic on Vilas Road Where Large Investments in Orchards Occur and Rely on Vilas for Farm Activities
MD-3	e	Low	No Adjacent Farm Uses Immediately Beyond URAs; Some potential for urban level traffic that will extend north to Foothill and Vilas where significant Orchards are located.
MD-3	f	Moderate	Adjacent to mixture of small farms with pasture and hay operations; Strong Potential for increase in Urban Traffic on Coker Butte Road which is relied upon for some farm uses.
MD-3	g	Very Low	No Adjacent or Nearby Farm Uses.
MD-4	h	Very Low	No Adjacent or Nearby Farm Uses; Surrounded by Urban Development
MD-5	i	Moderate	Some Nearby Farm Uses; Recent Investments in Vineyards Nearby; North Phoenix Already Experience Lots of Urban Level Traffic
MD-5	j	Very Low	No Adjacent or Nearby Farm Uses Outside URAs; Surrounded by Urban Development
MD-5	k	Low	No Adjacent but Some Nearby Farm Uses; Recent Investments in Vineyards Nearby; North Phoenix Already Experience Lots of Urban Level Traffic
MD-5	l	Low	Very little Adjacent or Nearby Farm Uses
MD-5	m	Very Low	Very little Adjacent or Nearby Farm Uses
MD-6	n	Moderate	Some Nearby Orchard Uses; South Stage Road Already Experience Fair Amount of Urban Level Traffic But An Increase Could Increase Conflicts
MD-6	o	Low	Adjacent to Former Orchards; Very Little Nearby Farm Uses Now Occuring; Mostly Urban Uses to North
MD-7	p	Moderate	Some Nearby Orchard Uses; South Stage Road Already Experience Fair Amount of Urban Level Traffic But An Increase Could Increase Conflicts
MD-7n	q	Low	Adjacent to Former Orchards; Very Little Nearby Farm Uses Now Occuring; Mostly Urban Uses to North
MD-7s	r	Moderate	Some Nearby Orchard Uses; South Stage Road Already Experience Fair Amount of Urban Level Traffic But An Increase Could Increase Conflicts
MD-8	s	Low	Very Little Nearby Farm Uses; Mostly Urban and Suburban Types of Uses
MD-9	t	High	Immediately Adjacent to Significant Field Crops ; Immediately Downwind of Sprays, Smells, Noise that are Difficult to Mitigate For
MD-9	u	High	Immediately Adjacent to Significant Orchards; Immediately Downwind of Sprays, Smells, Noise that are Difficult to Mitigate For
MD-9	v	Low	Some Farm Uses to West Mostly Pasture and Hay; Mostly Urban and Suburban Deveopment Surrounding