

PLANNING COMMISSION MEETING

Wednesday, January 3, 2024 at 6:30 PM

City Council Chambers, 125 SW "E" Street, Madras, OR 97741

Telephone (541) 475-2344 www.ci.madras.or.us

This meeting is open to the public. Audio/Video of the meeting will be available on our website within 24 hours following the meeting. This agenda includes a list of the principal subjects anticipated to be considered at the meeting. However, the agenda does not limit the ability of the Commission to consider additional subjects. Meetings may be canceled without notice. Zoom participants should use the "raise your hand" feature during the public comment portions of the meeting to alert the moderator that they would like to speak.

Zoom Link: https://us02web.zoom.us/j/89158939359?pwd=9SriNOpzLXhLOlsJZvfqG2a61Sf6C7.1

Dial: **253-215-8782**

Meeting ID: 891 5893 9359

Passcode: 465328

MADRAS PLANNING COMMISSION AGENDA

- I. Call Meeting to Order
- II. Roll Call
- III. Approval of Planning Commission Minutes
 - 1. December 6, 2023, Planning Commission Meeting.

IV. Public Hearing(s)

- City of Madras Yarrow UGB Amendment Proposal, File No. PA-23-1. (Legislative)
 - A. Open Public Hearing.
 - B. Declaration of Conflicts of Interest: Does any Commissioner have any actual economic
 - C. conflict of interest to disclose?
 - D. Staff Report/Applicant Testimony.
 - E. Public Testimony.
 - F. Staff Comments.
 - G. Deliberation (Motion to recommend approval, modification, denial, or continue the public
 - H. hearing to a date and time certain).

Nicholas Snead, Community Development Director

- 2. City of Madras Yarrow Annexation Boundary Change Proposal, File No. AX-23-2. (Legislative)
 - I. Open Public Hearing.
 - J. Declaration of Conflicts of Interest: Does any Commissioner have any actual economic
 - K. conflict of interest to disclose?
 - L. Staff Report/Applicant Testimony.
 - M. Public Testimony.
 - N. Staff Comments.
 - O. Deliberation (Motion to recommend approval, modification, denial, or continue the public
 - P. hearing to a date and time certain).

Nicholas Snead, Community Development Director

- V. Additional Discussion
- VI. Adjourn Meeting

CITY OF MADRAS Request for Planning Commission Action

Date Submitted:	December 26, 2023				
Agenda Date Requested:	January 3, 2024				
То:	Madras Planning Commission				
From:	Nicholas Snead, Community Development Director				
File:	PA-23-1				
Public Hearing Type:	Legislative				
Subject:	City of Madras Comprehensive Plan and Map Amendments for the adjustment of the Madras Urban Growth Boundary to remove and add 40 acres +/				
TYPE OF ACTION REQUESTED:	(Check One)				
[] Resolution	[] Ordinance				
[X] Formal Act	ion/Motion [] Other				
[] No Action -	Report & Discussion Only				

MOTION FOR PLANNING COMMISSION ACTION:

I move that the Hanning Commission approve the proposed City of Madras Comprehensive Plan map amendment and proposal to the City Council for consideration.

PROPOSAL OVERVIEW:

Madras is proposing a UGB land exchange to remove residential land from the UGB and replace it with an equivalent amount of land. The land being removed and added to the UGB is owned by City of Madras and is part of the Yarrow Master Plan area. The area being removed from the UGB is designated as R-3 under the Madras Comprehensive Plan and the area being added to the UGB will similarly be planned as R-3.

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The area for removal from the UGB is part of the Yarrow Master Plan, planned for development of housing built around a golf course. This area has moderate slopes that make it more difficult to build smaller, more affordable units, which is part of the rational for developing this area around a proposed golf course.

The area for addition to the UGB is directly west of the area proposed for removal. It is also part of the Yarrow Master Plan area. The plans for development of these two areas have changed over the years, along with the changes to development requirements in R-3. The Bean Foundation, owners of Yarrow, are focused on building a residential neighborhood with a mixture of housing types, affordable at a range of prices points. As a result, the Bean Foundation are in the process of revising the Yarrow Master Plan, with the intention of including the area proposed to be brought into the UGB. This report presents the proposed changes and findings to support the proposed UGB land exchange.

APPLCIABLE STATEWIDE PLANNING POLICY:

State Requirements for UGB Land Exchange

OAR 660-024-0070 provides direction on exchanging land within an UGB and replacing it with land presently located outside of the UGB. The requirement of OAR 660-024-0070(2) apply for the land removed and the provisions of Goal 14 Administrative Rule (OAR Chapter 660, Division 024) apply to the land included in the UGB as part of the exchange. Such exchanges also trigger requirements under ORS 197A.320

OAR 660-024-0070 UGB Adjustment

Under OAR 660-024-0070 provides direction on removing and replacing land in the UGB. A government may exchange land if it determines that the removal does not violate applicable statewide planning goals and rules and that the land supply within the UGB provides roughly the same supply of buildable land after the exchange. In addition, the exchange should not provide urban services to the land moved outside of the UGB, nor that it preclude efficient provision of urban services to buildable land within the UGB. The land removed from the UGB must be planned and zoned for rural uses.

Madras proposes to remove 42 acres of land planned as R-3 from its UGB and replace it with 42 acres of land that will be planned R-3 once in the UGB. The land removed will be re-zoned to Range Land (RL) by the Jefferson County. The land added to the UGB is within Madras' Urban Reserves and the land removed from the UGB will be added into the City's Urban Reserves (as addressed below).

ORS 197A.320 requirements, OAR 660-024-0065, and OAR 660-0024-0067

ORS 197A.320 and OAR 660-024-0065 establish a process for identifying a study area to evaluate land for inclusion in the UGB, which includes all land adjacent and within the one-half mile buffer of the Madras UGB. In addition, the study area included all exceptions areas within one mile of the Madras UGB. The final study area must include an amount of land that is at least twice the amount of land needed to replace the land removed from the Madras UGB. The final study area may exclude land from the evaluation of land for inclusion based on areas where it is impracticable to provide necessary public facilities or services to the land or areas with significant development hazards.

OAR 660-0024-0067 establishes the following priority of land for inclusion within a UGB:

- "First Priority" is urban reserve, exception land, and nonresource land.
- "Second Priority" is marginal land: land within the study area that is designated as marginal land
- "Third Priority" is forest or farm land that is not predominantly high-value farm land
- "Fourth Priority" is agricultural land that is predominantly high-value farmland

Goal 14 location factors

As noted in Goal 14, the location of the urban growth boundary and changes to the boundary shall be determined by evaluating alternative boundary locations consistent with ORS 197A.320 and with consideration of the following factors:

- 1. Efficient accommodation of identified land needs:
- 2. Orderly and economic provision of public facilities and services;
- 3. Comparative environmental, energy, economic and social consequences; and
- 4. Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the urban growth boundary.

Goal 14 allows local governments to specify characteristics, such as parcel size, topography or proximity, necessary for land to be suitable for an identified need.

APPROVAL PROCESS & PUBLIC HEARINGS:

As identified in the Urban Growth Area Management Agreement for the City of Madras, the Madras Planning Commission, Jefferson County Planning Commission, Madras City Council, and Jefferson County Board of Commissioners are to each hold public hearings on the proposal on the dates noted below in Table 1. Ultimately, the Madras City Council and Board of Commissioners are to take formal action to approve the same proposal. The public hearings schedule is subject to change if the City Council and Board of Commissioners are not able to agree upon the same proposal.

Table 1. Public Hearings

able 111 daining						
Hearings Body	Hearing Date					
Madras Planning Commission	January 3, 2024					
Jefferson County Planning Commission	February 8, 2024					
Madras City Council	February 13, 2024					
Jefferson County Board of Commissioners	February 28, 2024					

NOTICES:

The City has provided the required notice to the Oregon Department of Land Conservation and Development (DLCD) on September 21, 2023. The City issued notice of the proposal to all properties within 250 feet of the subject property on December 11, 2023. The Community Development Department published a notice of the January 3, 2023 Planning Commission public hearing in the December 20, 2023 and December 27, 2023 editions of the Madras Pioneer Newspaper. The Community Development Department also issued notice to public agencies on December 18, 2023.

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PUBLIC COMMENTS:

As of May 16, 2019 the Community Development Department has emails from two separate parties regarding the proposed amendments. Staff explained the proposal and provided copies of the findings and associated maps. Once the Community Development Director explained the proposal and the parties were able to review the maps, both parties had no further questions and did not formally submit comments on the proposal. No other public comments have been submitted to the Community Development Department. Staff is also not aware of any other outstanding issues that remain and need to be resolved.

DOCUMENTATION:

ATTACHMENT A: Madras UBG Land Exchange Justification & Findings

STAFF RECOMMENDATION:

Staff recommends that the Planning Commission approve the proposed City of Madras Comprehensive Plan map amendment and proposal to the City Council for consideration.

City Council for consideration.

MOTION FOR PLANNING COMMISSION ACTION:

I move that the Planning Commission approve the proposed City of Madras Comprehensive Plan map amendment and proposal to the City Council for consideration.

Madras UGB Land Exchange Justifications and Findings

November 2023

Prepared for: City of Madras

Draft Report



KOIN Center 222 SW Columbia Street Suite 1600 Portland, OR 97201 503-222-6060

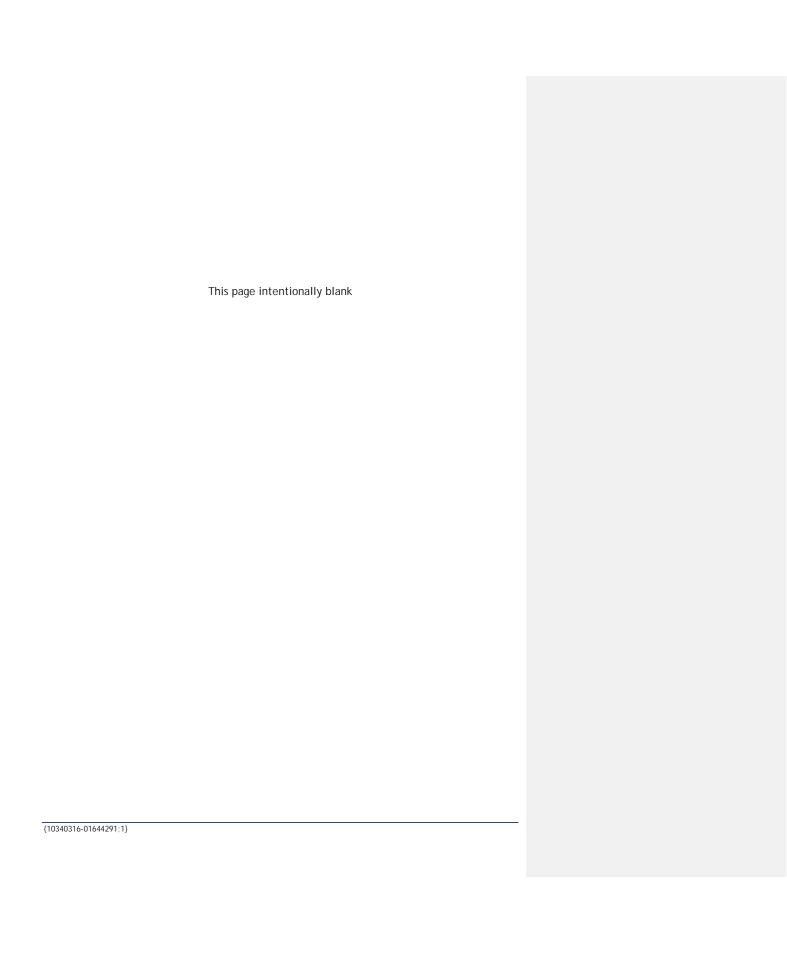


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Summary: Map (UGB) Amendments

Madras is proposing a UGB land exchange to remove residential land from the UGB and replace it with an equivalent amount of land. The land being removed and added to the UGB is owned by City of Madras and is part of the Yarrow Master Plan area. The area being removed from the UGB is planned R-3 and the area being added to the UGB will be planned R-3.

The area for removal from the UGB is part of the Yarrow Master Plan, planned for development of housing built around a golf course. This area has moderate slopes that make it more difficult to build smaller, more affordable units, which is part of the rational for developing this area around a proposed golf course.

The area for addition to the UGB is directly west of the area proposed for removal. It is also part of the Yarrow Master Plan area. The plans for development of these two areas have changed over the years, along with the changes to development requirements in R-3. The Bean Foundation, owners of Yarrow, are focused on building a residential neighborhood with a mixture of housing types, affordable at a range of prices points. As a result, the Bean Foundation are in the process of revising the Yarrow Master Plan, with the intention of including the area proposed to be brought into the UGB.

This narrative supports the following amendments to the Madras UGB Land Exchange:

Urban Growth Boundary Change

- 1. Change the Madras UGB to remove a portion (42 acres, 39 of which are buildable) of tax lot 1114070000100. The lot is owned by the City of Madras and is currently vacant. It is planned by the City as Planned Residential Development (R-3).
- 2. Change the Madras UGB to add in a different portion of tax lot 1114070000100. The area proposed to be brought into the UGB is about 42 acres, with 2 acres of constrained land, resulting in 40 acres of buildable land. The area proposed for inclusion in the UGB is owned by the City of Madras, designated as urban reserves, and is vacant.

Urban Reserve Change

- Once the land being removed from the UGB (42 acres of land) is removed, add it to Madras Urban Reserves.
- 2. Bring land from the Madras Urban Reserves (42 acres of land) into the Madras UGB.

Exhibit 1. Proposed Changes to the Madras UGB and Urban Reserves

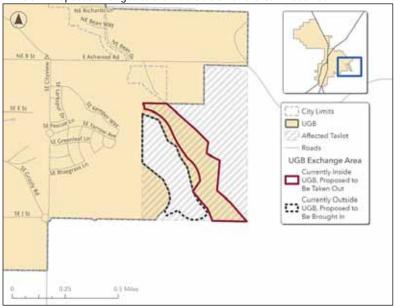


Exhibit 2. Exchange Area: Zoning



1. Introduction

Background

Madras is proposing a UGB land exchange to remove residential land from the UGB and replace it with an equivalent amount of land. The land being removed and added to the UGB is owned by City of Madras and is part of the Yarrow Master Plan area. The area being removed from the UGB is designated as R-3 under the Madras Comprehensive Plan and the area being added to the UGB will similarly be planned as R-3.

The area for removal from the UGB is part of the Yarrow Master Plan, planned for development of housing built around a golf course. This area has moderate slopes that make it more difficult to build smaller, more affordable units, which is part of the rational for developing this area around a proposed golf course.

The area for addition to the UGB is directly west of the area proposed for removal. It is also part of the Yarrow Master Plan area. The plans for development of these two areas have changed over the years, along with the changes to development requirements in R-3. The Bean Foundation, owners of Yarrow, are focused on building a residential neighborhood with a mixture of housing types, affordable at a range of prices points. As a result, the Bean Foundation are in the process of revising the Yarrow Master Plan, with the intention of including the area proposed to be brought into the UGB.

This report presents the proposed changes and findings to support the proposed UGB land exchange.

Applicable Statewide Planning Policy

State Requirements for UGB Land Exchange

OAR 660-024-0070 provides direction on exchanging land within an UGB and replacing it with land presently located outside of the UGB. The requirement of OAR 660-024-0070(2) apply for the land removed and the provisions of Goal 14 Administrative Rule (OAR Chapter 660, Division 024) apply to the land included in the UGB as part of the exchange. Such exchanges also trigger requirements under ORS 197A.320

OAR 660-024-0070 UGB Adjustment

Under OAR 660-024-0070 provides direction on removing and replacing land in the UGB. A government may exchange land if it determines that the removal does not violate applicable statewide planning goals and rules and that the land supply within the UGB provides roughly the same supply of buildable land after the exchange. In addition, the exchange should not provide urban services to the land moved outside of the UGB, nor that it preclude efficient

provision of urban services to buildable land within the UGB. The land removed from the UGB must be planned and zoned for rural uses.

Madras proposes to remove 42 acres of land planned as R-3 from its UGB and replace it with 42 acres of land that will be planned R-3 once in the UGB. The land removed will be re-zoned to Range Land (RL) by the Jefferson County. The land added to the UGB is within Madras' Urban Reserves and the land removed from the UGB will be added into the City's Urban Reserves (as addressed below).

ORS 197A.320 requirements, OAR 660-024-0065, and OAR 660-0024-0067

ORS 197A.320 and OAR 660-024-0065 establish a process for identifying a study area to evaluate land for inclusion in the UGB, which includes all land adjacent and within the one-half mile buffer of the Madras UGB. In addition, the study area included all exceptions areas within one mile of the Madras UGB. The final study area must include an amount of land that is at least twice the amount of land needed to replace the land removed from the Madras UGB. The final study area may exclude land from the evaluation of land for inclusion based on areas where it is impracticable to provide necessary public facilities or services to the land or areas with significant development hazards.

OAR 660-0024-0067 establishes the following priority of land for inclusion within a UGB:

- "First Priority" is urban reserve, exception land, and nonresource land.
- "Second Priority" is marginal land: land within the study area that is designated as marginal land
- "Third Priority" is forest or farm land that is not predominantly high-value farm land
- "Fourth Priority" is agricultural land that is predominantly high-value farmland

Goal 14 location factors

As noted in Goal 14, the location of the urban growth boundary and changes to the boundary shall be determined by evaluating alternative boundary locations consistent with ORS 197A.320 and with consideration of the following factors:

- 1. Efficient accommodation of identified land needs;
- 2. Orderly and economic provision of public facilities and services;
- 3. Comparative environmental, energy, economic and social consequences; and
- Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the urban growth boundary.

As noted above, Goal 14 allows local governments to specify characteristics, such as parcel size, topography or proximity, necessary for land to be suitable for an identified need.

Organization of this Document

This document is organized as follows:

- Chapter 2. Land Proposed for Removal from the Madras UGB presents the land proposed to be removed from the UGB.
- Chapter 3. Alternatives Analysis for Establishment of the UGB Land Exchange Study
 Area presents the process of establishing the study area and findings about inclusion of
 land in the final study area.
- Chapter 4. Goal 14 Locational Factors includes the evaluation and findings of each study subarea for the Goal 14 locational factors.
- Chapter 5. County and City Requirements for UGB Changes presents findings for compliance with Jefferson County and City of Madras requirements for UGB changes.
- Chapter 6. Statewide Goal Consistency Analysis presents findings that demonstrate that the proposed UGB concept complies with applicable state planning requirements.

2. Land Proposed for Exchange

This chapter describes the proposed UGB exchange land based on the requirements of OAR 660-024-0070. Madras proposes to remove approximately 39 buildable acres of land designated as R-3 under the Madras Comprehensive Plan and replace it with approximately 40 buildable acres of land that the City will designate R-3. The land proposed for removal has been planned for residential development in the Yarrow Master Plan, with larger-lot single-family housing built around a golf course. The land proposed for inclusion in the UGB is adjacent to the land proposed for removal and the revised Yarrow Master Plan expects to develop the land with a wider variety of housing, as required by Madras' Development Code, based on changes the City made to accommodate missing middle housing (adopted in July 2022).

The land proposed for inclusion in the UGB will be more integrated into Madras' neighborhoods, roads, and other infrastructure, as described in Chapter 3.

Proposed UGB Adjustment

OAR 660-024-0070 Describes the process for making adjustments to a city's UGB, including removing land from the UGB and exchanging it for other lands.

660-024-0070 UGB Adjustments

- (1) A local government may adjust the UGB at any time to better achieve the purposes of Goal 14 and this division. Such adjustment may occur by adding or removing land from the UGB, or by exchanging land inside the UGB for land outside the UGB. The requirements of section (2) of this rule apply when removing land from the UGB. The requirements of Goal 14 and this division[and ORS 197.298] apply when land is added to the UGB, including land added in exchange for land removed. The requirements of ORS 197.296 may also apply when land is added to a UGB, as specified in that statute. If a local government exchanges land inside the UGB for land outside the UGB, the applicable local government must adopt appropriate rural zoning designations for the land removed from the UGB prior to or at the time of adoption of the UGB amendment and must apply applicable location and priority provisions of OAR 660-024-0060 through 660-020-0067.
- (2) A local government may remove land from a UGB following the procedures and requirements of ORS 197.764. Alternatively, a local government may remove land from the UGB following the procedures and requirements of 197.610 to 197.650, provided it determines:
 - (a) The removal of land would not violate applicable statewide planning goals and rules;
 - (b) The UGB would provide a 20-year supply of land for estimated needs after the land is removed, or would provide roughly the same supply of buildable land as prior to the removal, taking into consideration land added to the UGB at the same time;

- (c) Public facilities agreements adopted under ORS 195.020 do not intend to provide for urban services on the subject land unless the public facilities provider agrees to removal of the land from the UGB and concurrent modification of the agreement;
- (d) Removal of the land does not preclude the efficient provision of urban services to any other buildable land that remains inside the UGB; and
- (e) The land removed from the UGB is planned and zoned for rural use consistent with all applicable laws.
- (3) Notwithstanding sections (1) and (2) of this rule, a local government considering an exchange of land may rely on the land needs analysis that provided a basis for its current acknowledged plan, rather than adopting a new need analysis, provided:
 - (a) The amount of buildable land added to the UGB to meet:
 - (A) A specific type of residential need is substantially equivalent to the amount of buildable residential land removed, or
 - (B) The amount of employment land added to the UGB to meet an employment need is substantially equivalent to the amount of employment land removed, and
 - (b) The local government must apply comprehensive plan designations and, if applicable, urban zoning to the land added to the UGB, such that the land added is designated:
 - (A) For the same residential uses and at the same housing density as the land removed from the UGB, or
 - (B) For the same employment uses as allowed on the land removed from the UGB, or
 - (C) If the land exchange is intended to provide for a particular industrial use that requires specific site characteristics, only land zoned for commercial or industrial use may be removed, and the land added must be zoned for the particular industrial use and meet other applicable requirements of ORS 197A.320(6).

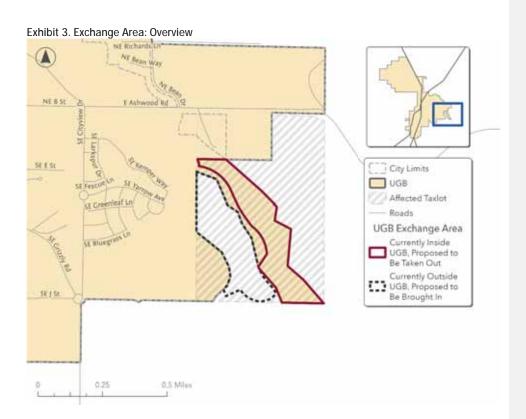
Land Proposed for Exchange from the Madras UGB

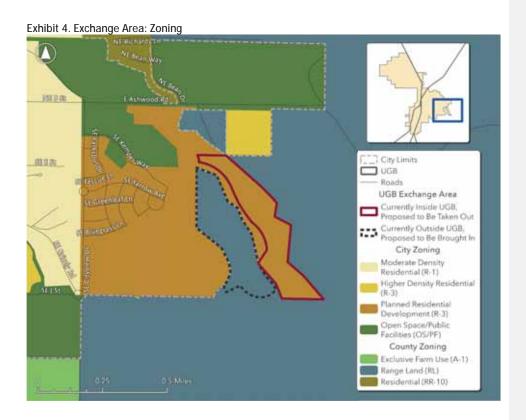
The land proposed for removal from the Madras UGB, as shown in Exhibit 3, is located on a portion of tax lot 1114070000100. The lot is owned by the City of Madras and is currently vacant. It is located within the City limits, comprehensive planned and zoned by the City as Planned Residential Development (R-3) (Exhibit 4).

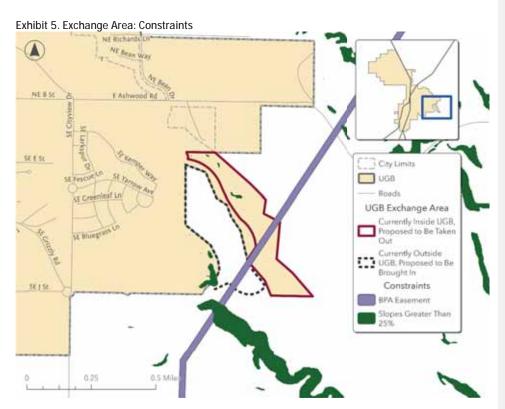
The total acreage of the lot is 197 acres, with 185 acres of buildable land. The lot is constrained by two features as shown in Exhibit 5—slopes greater than 25% in elevation and a 50-foot-wide easement for Bonneville Power Administration (BPA) transmission lines. These constraints together account for 12 acres of land.

Only a portion of this tax lot is proposed for removal, shown on in Exhibit 3. The area of land proposed to be taken out of the UGB is about 42 acres, 3 acres of which are constrained, leaving 39 acres buildable.

Exhibit 3 shows the area proposed to be included in the UGB, which is immediately adjacent to the area proposed for removal. It is also part of tax lot 1114070000100. The area proposed to be brought into the UGB is about 42 acres, with 2 acres of constrained land, resulting in 40 acres of buildable land. The area proposed for inclusion in the UGB is owned by the City of Madras, zoned Range Land (but included in City's urban reserves), and is vacant.







The area for removal from the UGB is part of the Yarrow Master Plan, planned for development of housing built around a golf course. This area has moderate slopes that make it more difficult to build smaller, more affordable units, which is part of the rational for developing this area around a proposed golf course.

The original Yarrow Master Plan was developed before the City updated its Development Code to require more diversified housing as part of the master planning process and to allow "missing middle" housing types in its residential zones. As of July 2022, the R-3 zone allows for development of different housing types at a range of densities, as described below.

- Single-family detached: at minimum lot size of 6,000 square feet or 7.3 dwelling units
 per acre. Assuming that housing builds out at 80% of maximum allowed density and
 that land for rights-of-way accounts for 25% of land, the maximum density would be 4.4
 dwelling units per acre.
- Townhouse: at up to 29 dwelling units per acre. Assuming that housing builds out at 80% of maximum allowed density and that land for rights-of-way accounts for 25% of land, the maximum density would be 15 dwelling units per acre.

- One to four units: at up to 23 dwelling units per acre. Assuming that housing builds out at 80% of maximum allowed density and that land for rights-of-way accounts for 25% of land, the maximum density would be 13.8 dwelling units per acre.
- Cottage Cluster: at up to 21 dwelling units per acre. Assuming that housing builds out at 80% of maximum allowed density and that land for rights-of-way accounts for 25% of land, the maximum density would be 12 dwelling units per acre.
- Apartments with 5 or more units: at up to 26 dwelling units per acre. Assuming that
 housing builds out at 80% of maximum allowed density and that land for rights-of-way
 accounts for 25% of land, the maximum density would be 16.8 dwelling units per acre.

The plans for development of the parts of Yarrow adjacent to the areas proposed for the exchange have changed over the years, along with the changes to development requirements in R-3. The Bean Foundation, owners of Yarrow, are focused on building a residential neighborhood with a mixture of housing types, affordable at a range of prices points. As a result, the Bean Foundation are in the process of revising the Yarrow Master Plan, with the intention of including the area proposed to be brought into the UGB.

Recent development and planned development in the Yarrow Master Plan area reflect these plans. In specific, the Heights at Yarrow is 144 units of multifamily housing that was developed in the last few years. The Yarrow Master Plan (July 2022) includes plans for development of: nearly 500 single-family units (about half on large lots and half on small-medium lots), 11 townhouses, potential for multifamily on about 30 acres of land (but no units estimated yet), 48 acres of parks and open space, 10.5 acres for a future school, and 0.4 acres of commercial mix-ed use.

Madras requires a minimum overall density of 7 dwelling units per gross acre in the R-3 zone (for the entire subdivision) and that master planned subdivisions (which are required for any residential development in excess of 10 acres) with at least 50 dwellings include at least two types dwelling units and proposals with 100 or more must contain at least three types of dwelling units. Exhibit 6 shows the potential capacity of the exchange area, given the allowed densities described above. The Yarrow Master Planned called for development of this area as single-family detached housing. In the future the Bean Foundation intends to develop the new area with a mixture of housing types, as allowed and required in the R-3 zone.

Exhibit 6 shows the potential capacity of the 39 acres of land proposed to be removed from the UGB by housing type. The densities used in Exhibit 6 are based on those used in the 2023 *Madras Housing Capacity Analysis* and the densities allowed by Madras' Development Code. The capacity for the 40 acres of land proposed for inclusion in the UGB is within 3% of the capacity of land proposed for removal, with the difference being the slight difference in buildable acres between the two areas.

Exhibit 6. Exchange Area: Potential Capacity

		<u> </u>				
	Area inside the UGB, Proposed to be Removed			Area outside the UGB, Proposed to be Added into the UGB		
	Buildable	Allowed Density (DU/	Capacity (Dwelling	Buildable	Allowed Density	Capacity (Dwelling
Zone/Housing Type	Acres	Acre)	Units)	Acres	(DU/ Acre)	Units)
R-3	39			40		
Single-family detached		5.2	203		5.2	208
Townhouse		15.0	585		15.0	600
One to four dwelling units		13.8	538		13.8	552
Apartments - 5+ du		16.8	655		16.8	672

The City will apply the Planned Residential Development (R-3) Comprehensive Plan designation and zone to the land brought into the UGB. The County will apply the Range Land (RL) Comprehensive Plan designation and zone to the land removed from the UGB.

Compliance with OAR 660-024-0070

OAR 660-024-0070 Describes the process for making adjustments to a city's UGB, including removing land from the UGB and exchanging it for other lands.

660-024-0070 UGB Adjustments

(1) A local government may adjust the UGB at any time to better achieve the purposes of Goal 14 and this division. Such adjustment may occur by adding or removing land from the UGB, or by exchanging land inside the UGB for land outside the UGB. The requirements of section (2) of this rule apply when removing land from the UGB. The requirements of Goal 14 and this division[and ORS 197.298] apply when land is added to the UGB, including land added in exchange for land removed. The requirements of ORS 197.296 may also apply when land is added to a UGB, as specified in that statute. If a local government exchanges land inside the UGB for land outside the UGB, the applicable local government must adopt appropriate rural zoning designations for the land removed from the UGB prior to or at the time of adoption of the UGB amendment and must apply applicable location and priority provisions of OAR 660-024-0060 through 660-020-0067.

Finding: The proposal includes removal of land presently within the UGB in exchange for land presently located outside of the UGB. The requirements for exchange of those respective lands are addressed below. ORS 197.296 is that statute setting forth the requirements for local governments to conduct analysis of housing capacity and needed housing and is addressed below. The removed land will be given a rural zoning designation through a contemporaneous action from Jefferson County.

(2) A local government may remove land from a UGB following the procedures and requirements of ORS 197.764. Alternatively, a local government may remove land from

the UGB following the procedures and requirements of 197.610 to 197.650, provided it determines:

Finding: ORS 197.764 is not applicable to the subject property as it is not assessed for farm use. Accordingly, the City is proposing to follow the procedures and requirements of ORS 197.610 to 197.650, which outlines the process for a post-acknowledgement amendments to comprehensive plans and land use regulations.

(a) The removal of land would not violate applicable statewide planning goals and rules:

Finding: The proposal complies with applicable statewide planning goals and rules as set out below.

(b) The UGB would provide a 20-year supply of land for estimated needs after the land is removed, or would provide roughly the same supply of buildable land as prior to the removal, taking into consideration land added to the UGB at the same time;

Finding: The proposal results in roughly the same supply of buildable lands within the UGB as the exchange involves the same number of gross acres and the addition of one buildable acre.

(c) Public facilities agreements adopted under ORS 195.020 do not intend to provide for urban services on the subject land unless the public facilities provider agrees to removal of the land from the UGB and concurrent modification of the agreement;

Finding: There are no public facilities agreements to provide urban services on the land proposed for removal from the UGB.

(d) Removal of the land does not preclude the efficient provision of urban services to any other buildable land that remains inside the UGB; and

Finding: Removal of the proposed lands does not inhibit efficient provision of urban services to any buildable lands that will remain within the UGB.

(e) The land removed from the UGB is planned and zoned for rural use consistent with all applicable laws.

Finding: The land removed from the UGB will be zoned Range Land by contemporaneous action of Jefferson County consistent with applicable laws.

- (3) Notwithstanding sections (1) and (2) of this rule, a local government considering an exchange of land may rely on the land needs analysis that provided a basis for its current acknowledged plan, rather than adopting a new need analysis, provided:
 - (a) The amount of buildable land added to the UGB to meet:
 - (A) A specific type of residential need is substantially equivalent to the amount of buildable residential land removed, or

. . .

- (b) The local government must apply comprehensive plan designations and, if applicable, urban zoning to the land added to the UGB, such that the land added is designated:
 - (A) For the same residential uses and at the same housing density as the land removed from the UGB, or

. . .

Finding: The City need not adopt a new housing needs analysis because the amount of building land added to the UGB is substantially equivalent to the land removed and will be subject to the same plan designation and zoning and thus have no net effect on the supply of residential lands needed to meet any particular residential need.

3. Alternatives Analysis for Establishment of the UGB Land Exchange Study Area

Chapter 2 showed that Madras is proposing to remove 39 acres of buildable land from the UGB and replace it with 40 acres of adjacent buildable land and that the proposal complies for requirements of land removal. This chapter presents the alternatives analysis required by OAR 660-024-0060 as well as findings related to the prioritization described in ORS 197A.320 as necessary to analyze compliance for the land to be added to the UGB.

Establishment of Study Area for UGB Land Exchange

Definition of the Preliminary Study Area

Exhibit 7 shows the study area for the alternatives analysis based on the following requirements:

660-024-0065 Establishment of Study Area to Evaluate Land for Inclusion in the UGB

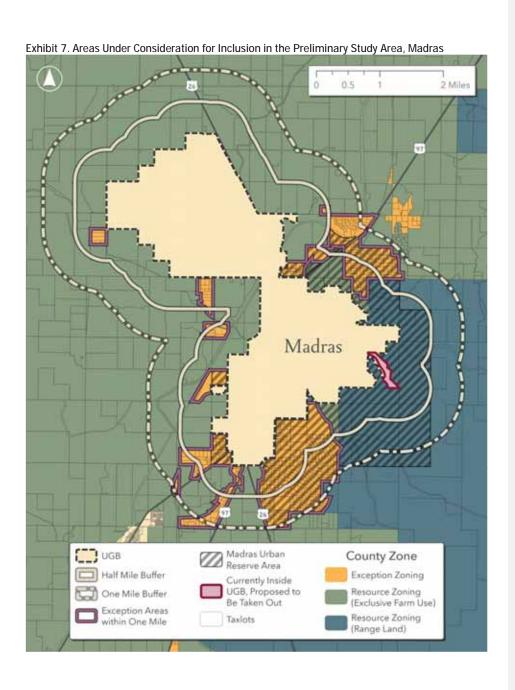
- (1) When considering a UGB amendment to accommodate a need deficit identified in OAR 660-024-0050(4), a city outside of Metro must determine which land to add to the UGB by evaluating alternative locations within a "study area" established pursuant to this rule. To establish the study area, the city must first identify a "preliminary study area" which shall not include land within a different UGB or the corporate limits of a city within a different UGB. The preliminary study area shall include:
 - (a) All lands in the city's acknowledged urban reserve, if any;
 - (b) All lands that are within the following distance from the acknowledged UGB:
 - (A) For cities with a UGB population less than 10,000: one-half mile;
 - (B) For cities with a UGB population equal to or greater than 10,000: one mile;
 - (c) All exception areas contiguous to an exception area that includes land within the distance specified in subsection (b) and that are within the following distance from the acknowledged UGB:
 - (A) For cities with a UGB population less than 10,000: one mile;
 - (B) For cities with a UGB population equal to or greater than 10,000: one and one-half miles:

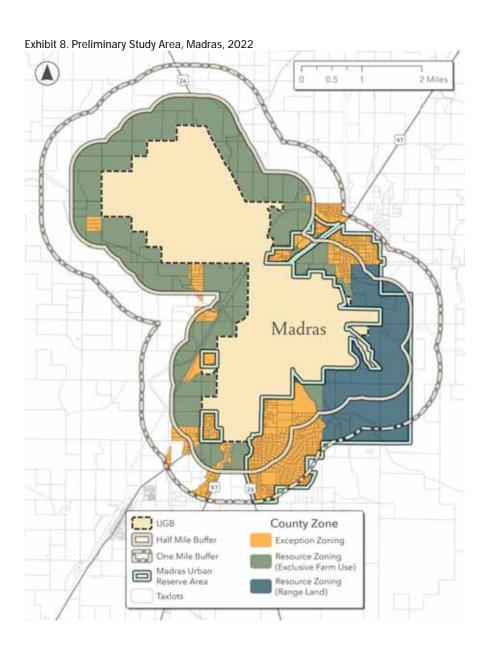
The subject proposal is not the result of a need deficit identified in OAR 660-024-0050(4). The City has nonetheless conducted such an analysis to demonstrate the appropriateness of the proposal.

Based on the foregoing provisions, the City evaluated all lands adjacent to the Madras UGB for suitability for residential uses. For purposes of the Alternatives Analysis, the City reviewed land within the one-half mile buffer of the Madras UGB, as shown in Exhibit 7, as well as all Exceptions Zones within a one-mile buffer.

The preliminary study area includes:

- 6,809 acres of land within one-half mile of the Madras UGB.
- 3,970 acres of land in urban reserves, including that beyond 1 mile from the UGB
- 343 acres of land in exceptions zoning that is between ½ and 1 mile from the Madras UGB and not within the City's urban reserve (which includes an additional 892 of exceptions area).





Refining the Preliminary Study Area

The analysis of residential land is organized by classes of land that correspond to the OAR 660-024-0067(2) priorities for inclusion of land into a UGB. The evaluation of the subareas considers the following:

660-024-0067 Evaluation of Land in the Study Area for Inclusion in the UGB; Priorities

- (1) A city considering a UGB amendment must decide which land to add to the UGB by evaluating all land in the study area determined under OAR 660-024-0065, as follows
 - (a) Beginning with the highest priority category of land described in section (2), the city must apply section (5) to determine which land in that priority category is suitable to satisfy the need deficiency determined under OAR 660-024-0050 and select for inclusion in the UGB as much of the land as necessary to satisfy the need.
 - (b) If the amount of suitable land in the First Priority category is not sufficient to satisfy all the identified need deficiency, the city must apply section (5) to determine which land in the next priority is suitable and select for inclusion in the UGB as much of the suitable land in that priority as necessary to satisfy the need. The city must proceed in this manner until all the land need is satisfied, except as provided in OAR 660-024-0065(9).
 - (c) If the amount of suitable land in a particular priority category in section (2) exceeds the amount necessary to satisfy the need deficiency, the city must choose which land in that priority to include in the UGB by applying the criteria in section (7) of this rule.
 - (d) In evaluating the sufficiency of land to satisfy a need under this section, the city may use the factors identified in sections (5) and (6) of this rule to reduce the forecast development capacity of the land to meet the need.
 - (e) Land that is determined to not be suitable under section (5) of this rule to satisfy the need deficiency determined under OAR 660-024-0050 is not required to be selected for inclusion in the UGB unless its inclusion is necessary to serve other higher priority lands.
- (2) Priority of Land for inclusion in a UGB:
 - (a) First Priority is urban reserve, exception land, and nonresource land. Lands in the study area that meet the description in paragraphs (A) through (C) of this subsection are of equal (first) priority:
 - (A) Land designated as an urban reserve under OAR chapter 660, division 21, in an acknowledged comprehensive plan;
 - (B) Land that is subject to an acknowledged exception under ORS 197.732; and
 - (C) Land that is nonresource land.

- (b) Second Priority is marginal land: land within the study area that is designated as marginal land under ORS 197.247 (1991 Edition) in the acknowledged comprehensive plan.
- (c) Third Priority is forest or farm land that is not predominantly high-value farm land: land within the study area that is designated for forest or agriculture uses in the acknowledged comprehensive plan and that is not predominantly high-value farmland as defined in ORS 195.300, or that does not consist predominantly of prime or unique soils, as determined by the United States Department of Agriculture Natural Resources Conservation Service (USDA NRCS). In selecting which lands to include to satisfy the need, the city must use the agricultural land capability classification system or the cubic foot site class system, as appropriate for the acknowledged comprehensive plan designation, to select lower capability or cubic foot site class lands first.
- (d) Fourth Priority is agricultural land that is predominantly high-value farmland: land within the study area that is designated as agricultural land in an acknowledged comprehensive plan and is predominantly high-value farmland as defined in ORS 195.300. A city may not select land that is predominantly made up of prime or unique farm soils, as defined by the USDA NRCS, unless there is an insufficient amount of other land to satisfy its land need. In selecting which lands to include to satisfy the need, the city must use the agricultural land capability classification system to select lower capability lands first.

Exhibit 9 shows exclusion of land that does not meet the requirements of OAR 660-024-0067(1), excluding land that is not "First Priority" as defined in OAR 660-024-0067(2). This step removed all non "First Priority" lands by excluding lands zoned Exclusive Farm Use (EFU) or Range Land (RL) within the ½ mile buffer of Madras UGB unless they were designated as urban reserves or non-resource land.

This leaves a total of 4,508 acres within the study area, with 3,923 acres within the City's urban reserves and 585 acres in exception zoning within the one-mile UGB buffer. All of these lands are "First Priority" lands.

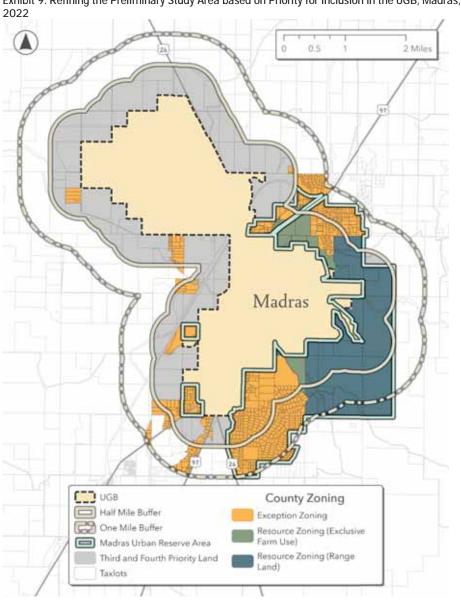


Exhibit 9. Refining the Preliminary Study Area based on Priority for Inclusion in the UGB, Madras,

Areas Non-Contiguous with the UGB that are Impracticable to Serve

The next step is to remove areas that are not contiguous to the UGB and are impracticable to serve based on OAR 660-024-0065(7).

OAR 660-024-0065 Establishment of Study Area to Evaluate Land for Inclusion in the UGB

- (7) For purposes of subsection (4)(a), the city may consider it impracticable to provide necessary public facilities or services to the following lands:
 - (a) Contiguous areas of at least five acres where 75 percent or more of the land has a slope of 25 percent or greater, provided that contiguous areas 20 acres or more that are less than 25 percent slope may not be excluded under this subsection. Slope shall be measured as the increase in elevation divided by the horizontal distance at maximum ten-foot contour intervals:
 - (b) Land that is isolated from existing service networks by physical, topographic, or other impediments to service provision such that it is impracticable to provide necessary facilities or services to the land within the planning period. The city's determination shall be based on an evaluation of:
 - (A) The likely amount of development that could occur on the land within the planning period;
 - (B) The likely cost of facilities and services; and,
 - (c) Any substantial evidence collected by or presented to the city regarding how similarly situated land in the region has, or has not, developed over time.
 - (c) As used in this section, "impediments to service provision" may include but are not limited to:
 - (A) Major rivers or other water bodies that would require new bridge crossings to serve planned urban development;
 - (B) Topographic features such as canyons or ridges with slopes exceeding 40 percent and vertical relief of greater than 80 feet;
 - (C) Freeways, rail lines, or other restricted access corridors that would require new grade separated crossings to serve planned urban development;
 - (D) Significant scenic, natural, cultural or recreational resources on an acknowledged plan inventory and subject to protection measures under the plan or implementing regulations, or on a published state or federal inventory, that would prohibit or substantially impede the placement or construction of necessary public facilities and services.

Exhibit 10 shows areas that are not contiguous to the UGB and are impracticable to serve.

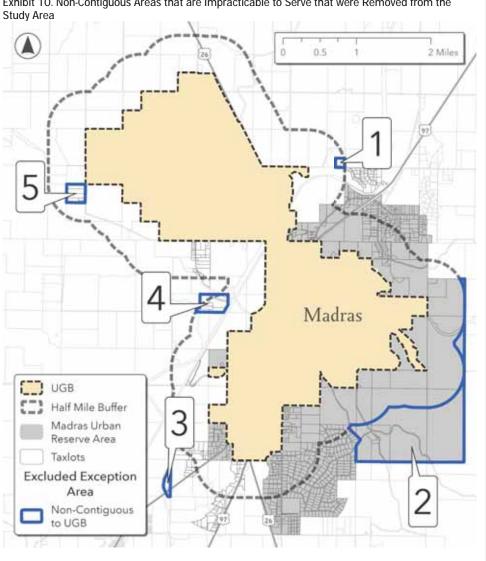


Exhibit 10. Non-Contiguous Areas that are Impracticable to Serve that were Removed from the

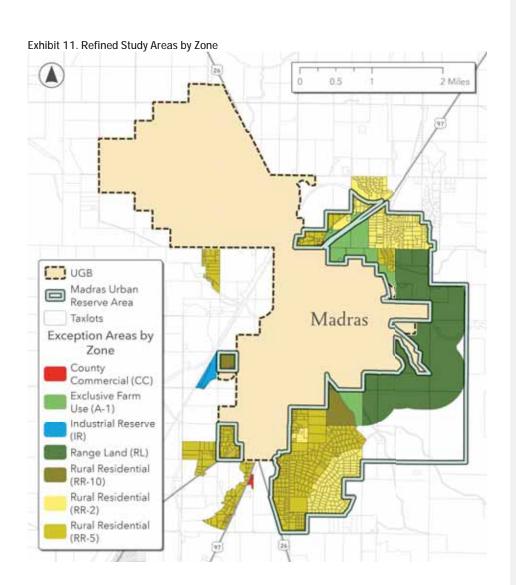
The following areas are all either exceptions areas (some within ½ mile of the UGB and some beyond ½ mile) or urban reserves beyond ½ mile of the UGB. These areas are all impracticable to serve, given their distance from the UGB. In addition, some of these areas contain too few acres to meet the identified land need of about 39 areas on their own.

- Area 1. This area is 10 acres in exceptions zoning outside of the Urban Reserves, located 1,991 feet/0.04 miles from the UGB. It is too small to meet the land needs and is impracticable to serve on its own.
- Area 2. This area is 700 acres in RL zoning and within the Urban Reserves. It is ½ mile or more from the UGB and some parts are beyond 1 mile of the UGB. The distance to the UGB, plus any portion of Area 4 includes well more than the amount of land needed to meet the identified land need of about 39 acres. Land in Area 2 is impracticable to serve on its own without including a substantial amount of land closer to the UGB.
- Area 3. This area is 17 acres in exceptions zoning outside of the Urban Reserves. It is too small to meet the land needs and is impracticable to serve on its own.
- Area 4. This area is 59 acres in exceptions zoning outside of the Urban Reserves, located ¼ mile to more than ½ mile from the UGB. It is impracticable to serve, given its distance from the UGB.
- Area 5. This area is 40 acres in exceptions zoning outside of the Urban Reserves. While
 the northeast corner of this area touches a corner of the UGB, there is no direct road
 connection from the UGB that doesn't also fall in other non-UGB areas. It is located
 adjacent to Industrial areas of Madras, away from existing residential neighborhoods. It
 is impracticable to serve on its own.

Refined Preliminary Study Area

Exhibit 11 shows the refined preliminary areas for the alternatives analysis, which are either exceptions areas or urban reserve areas. These are all First Priority for inclusion in the UGB, consistent with 660-024-0067(2). These areas together account for 4,508 acres of land in the following zoning:

- Exclusive Farm Use (A-1) within Urban Reserves: 308 acres
- Range Land (RL) within Urban Reserves: 1,225 acres
- Exceptions areas in the following zoning:
 - County Commercial (CC): 10 acres
 - Industrial Reserve (IR): 46 acres
 - Rural Residential (RR-2): 770 acres
 - Rural Residential (RR-5): 1,198 acres
 - Rural Residential (RR-10): 132 acres



Identifying Unsuitable Areas within the Study Area

The next step is identifying areas within the study area that are unsuitable for potential inclusion in the UGB based on OAR 660-024-0067.

Parcelization and Development Patterns

660-024-0067 Evaluation of Land in the Study Area for Inclusion in the UGB; Priorities

- (5) With respect to section (1), a city must assume that vacant or partially vacant land in a particular priority category is "suitable" to satisfy a need deficiency identified in OAR 660-024-0050(4) unless it demonstrates that the land cannot satisfy the specified need based on one or more of the conditions described in subsections (a) through (g) of this section: Existing parcelization, lot sizes or development patterns of rural residential land make that land unsuitable for an identified employment need; as follows:
 - (A) Parcelization: the land consists primarily of parcels 2-acres or less in size, or
 - (B) Existing development patterns: the land cannot be reasonably redeveloped or infilled within the planning period due to the location of existing structures and infrastructure."

OAR 660-024-0067(5) allows a city to assume that land that is parcelized or has a development pattern the is unlikely to redevelop or infill within the planning period can be assumed not to meet the identified need. Exhibit 12 shows land with high levels of parcelization or subdivisions, which are future plans for parcelization.

Exhibit 12 shows areas with a large amount of highly parcellated land, identified by visual inspection of clusters of highly parcellated tax lots, and/or a high number of subdivisions.

- Parcelized land. 488 acres, shown in pink in Exhibit 12, are in parcels 2 acres or smaller.
 These lands are considered unsuitable for potential inclusion in the UGB based on OAR 660-024-0067(5).
- Subdivisions. 898 acres, shown in green in Exhibit 12, are within an existing subdivision. Some of these parcels are currently larger than 2 acres but are planned for future development in smaller lots.

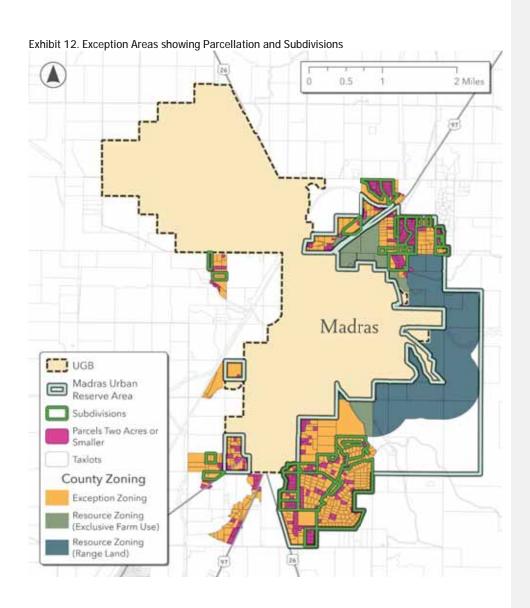


Exhibit 13 shows areas removed from the study area based on high degree of parcelization and subdivisions. This includes four areas shown in red, all of which are in exceptions zoning.

UGB
Half Mile Buffer
Madras Urban
Reserve Area
Taxlots
Excluded Exception
Areas
High Degree of
Parcelization and
Subdivisions

Exhibit 13. Areas with Parcellation and Subdivisions removed from the Study Area

This results in the removal of the following:

- Area 6: This area has a high degree of parcelization and existing subdivision. This area
 has 625 acres, 43% of which is in parcels 2 acres or smaller or in a subdivision. In
 addition, most of this area is not adjacent to the existing UGB, making it impracticable to
 provide future services to without inclusion of substantially more land than the
 identified land need.
- Area 7: This area has a high degree of parcelization and existing subdivision. This area
 has 914 acres, 74% of which is in parcels 2 acres or smaller or in a subdivision. In
 addition, most of this area is not adjacent to the existing UGB, making it impracticable to
 provide future services to without inclusion of substantially more land than the
 identified land need.
- Area 8: This area has a high degree of parcelization and existing subdivision. This area has 308 acres, 30% of which is in parcels 2 acres or smaller or in a subdivision. The areas with larger than 2 acre parcels are generally located further from the UGB, including some beyond ½ mile from the UGB. This makes it impracticable to provide future services to without inclusion of substantially more land than the identified land need.
- Area 9: This area has a high degree of parcelization and existing subdivision. This area has 77 acres, 41% of which is in parcels 2 acres or smaller or in a subdivision. The areas with larger than 2 acre parcels are generally located further from the UGB, including some beyond ½ mile from the UGB. This makes it impracticable to provide future services to without inclusion of substantially more land than the identified land need.

Commercial and Industrial Planned Areas

Exhibit 14 shows exceptions areas with County Commercial (CC) and Industrial Reserves (IR).

Madras

UGB
Half Mile Buffer
Madras Urban
Reserve Area
Taxlots
Excluded Exception
Areas
Non-Residential
Zoning

Exhibit 14. Commercial and Industrial planned area removed from the Study Area

This results in removal of the following:

- Area 10: This area is zoned County Commercial (CC). It has 8 acres of land. In addition, it is not contiguous to the UGB, is impracticable to serve, and too small to meet the need for about 39 acres of land,.
- Area 11: This area is zoned Industrial Reserve (IR). It has 46 acres of land.

Final Study Area with Subareas

Exhibit 15 breaks up the remaining 1,679 acres in the study area into 21 subareas for evaluation for inclusion in the UGB. This area is more than twice the land need for about 39 acres of buildable land.

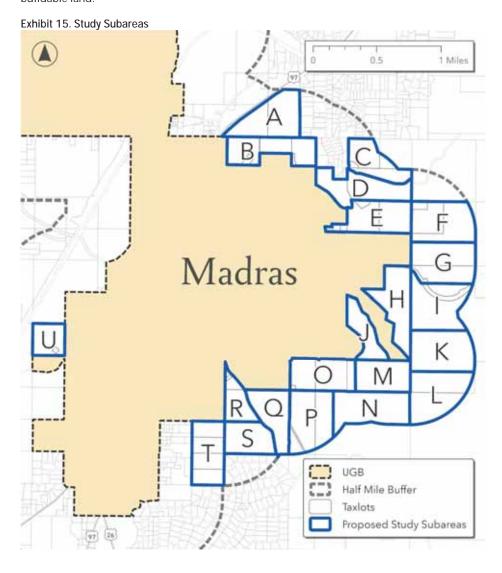


Exhibit 16 shows constraints with the subareas.

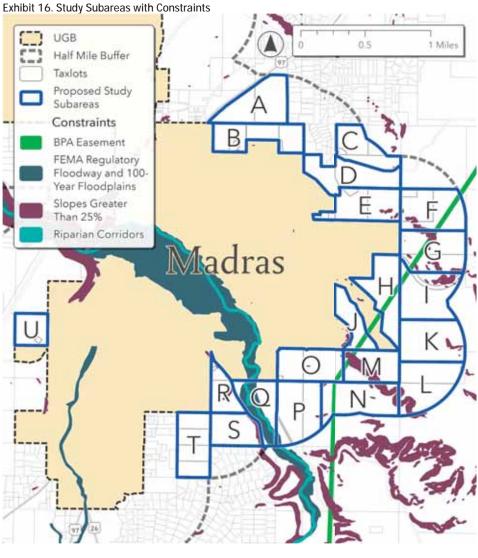


Exhibit 17 shows the subareas by zone, total acres, vacant acres, and vacant unconstrained acres. Exhibit 15 shows these subareas geographically.

Exhibit 17. Madras UGB Land Exchange Study Subareas

Study Subarea	Total Acres	Unconstrained Acres	Total Parcels	Average Parcel Size	Existing Dwelling Units	Average Parcel with Dwelling Unit Size	Vacant Parcels	Average Vacant Parcel Size
A	92	92	2	46	-	-	2	46
В	83	83	6	14	3	12	3	15
С	64	64	4	15	1	2	3	19
D	87	87	2	22	-	-	2	22
E	85	83	6	14	5	9	1	40
F	98	89	3	33	1	35	2	32
G	100	86	2	32	-	-	2	32
Н	84	80	1	83	-	-	1	83
1	100	92	1	45	-	-	1	45
J	47	44	1	47	-	-	1	47
K	100	98	1	100	-	-	1	100
L	99	91	2	33	-	-	2	33
M	68	51	1	68	-	-	1	68
N	99	85	1	99	-	-	1	99
0	82	80	4	20	-	-	4	20
Р	100	97	3	33	1	51	2	23
Q	69	37	1	63	1	63	-	=
R	43	41	4	11	2	17	2	4
S	59	55	1	59	1	59	-	-
T	80	80	4	20	4	20	-	-
U	40	40	2	20	1	1	1	39
Total	1,679	1,556	52		20		32	

For the final study area and subareas in Exhibit 15, the City finds:

Finding: The City finds it has at least twice the amount of land needed for the land exchange, consistent with OAR 660-024-0065(5).

Finding: The City finds that land within Urban Reserves and Exceptions Areas provides enough land to meet Madras' needs for a land exchange, without considering land beyond the First Priority, consistent with OAR 660-024-0067(2).

Detailed Subarea Maps

Exhibit 18 through Exhibit 28 shows up close views of the remaining subareas. All areas are within the Madras Urban Reserves.

Exhibit 18. Study Subareas A and B

City Limits
UGB
Half Mile
Buffer
Proposed
Study
Subareas
Constraints
Roads
Taxlots

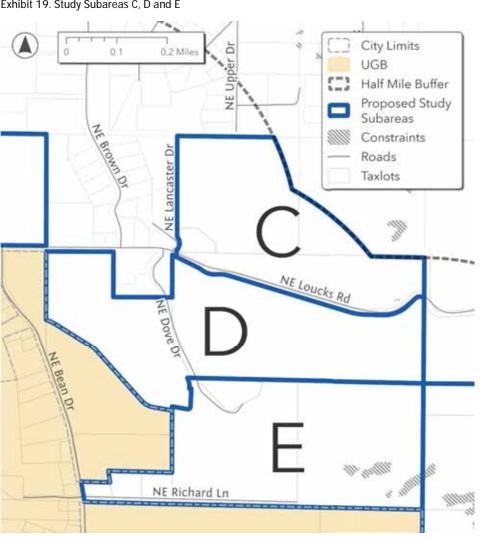
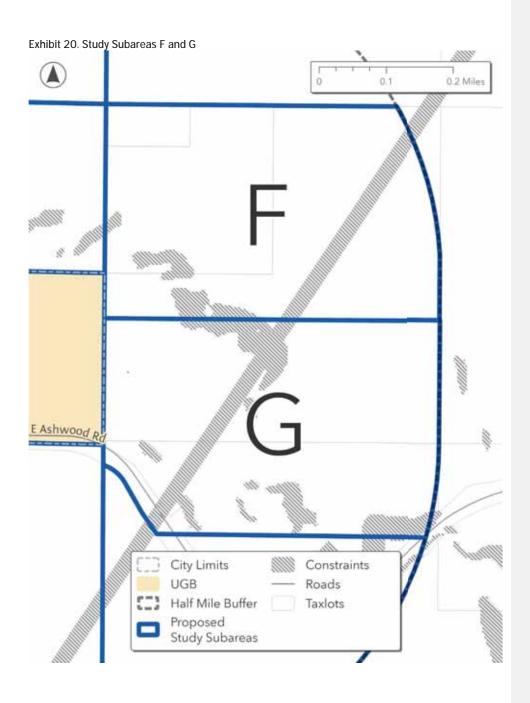
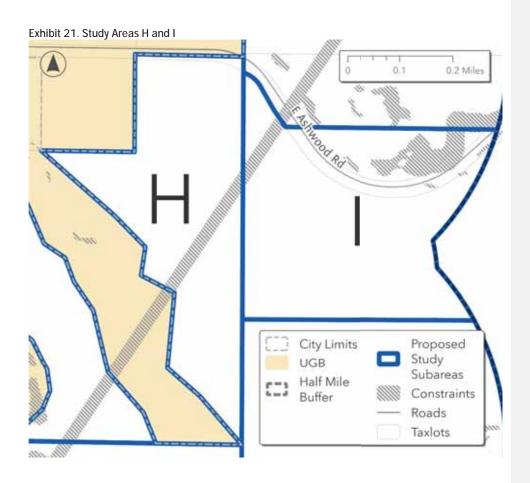
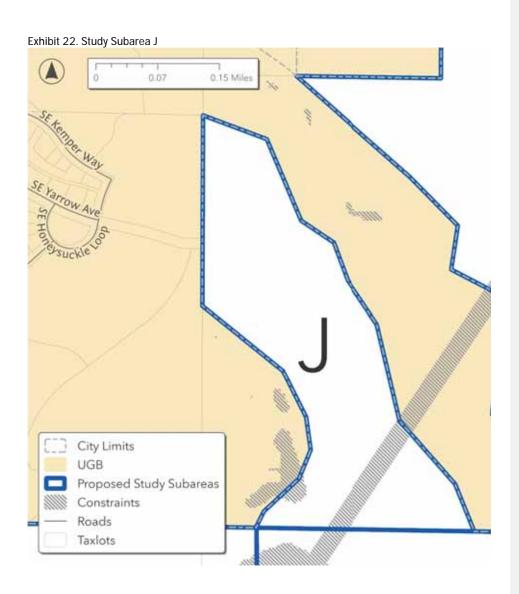
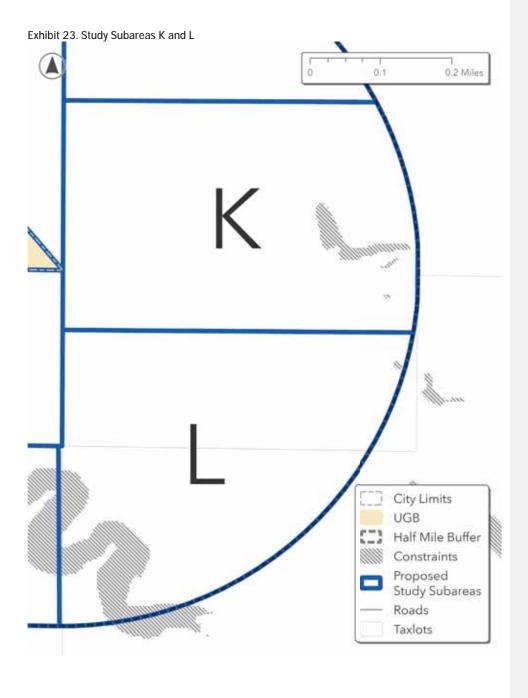


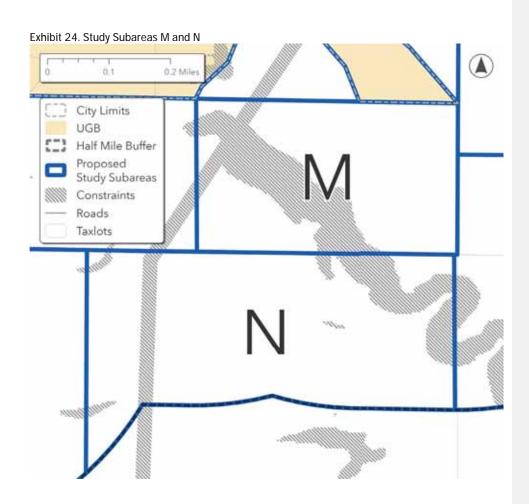
Exhibit 19. Study Subareas C, D and E

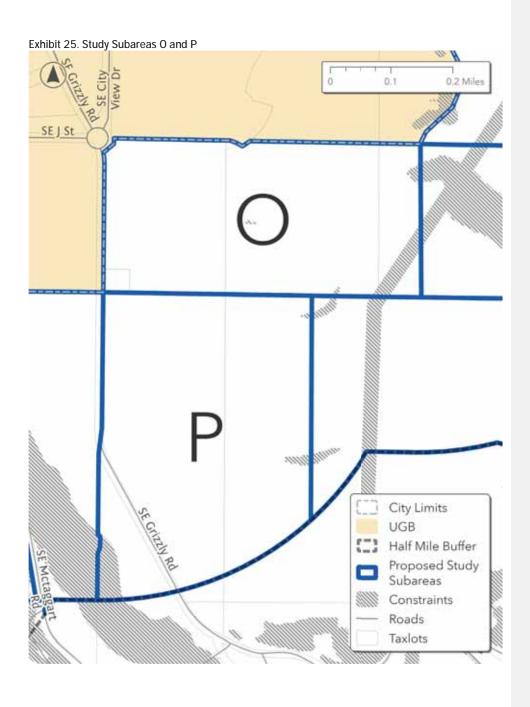


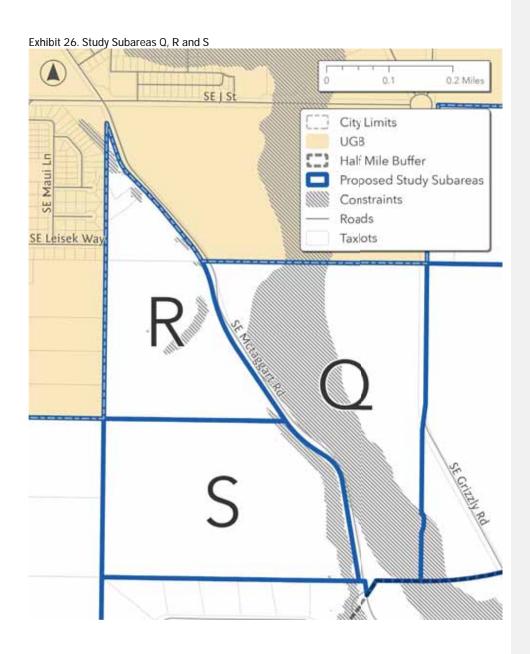


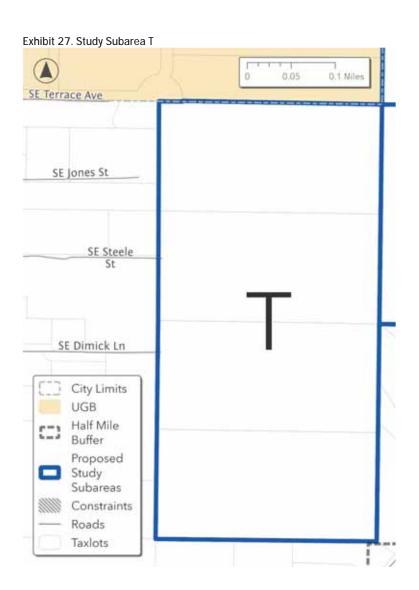


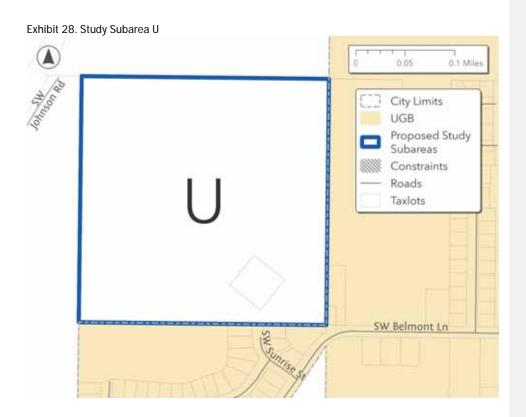












4. Goal 14 Locational Factors

Chapter 4 includes additional findings demonstrating compliance Goal 14 locational factors. Goal 14 establishes four boundary location factors that must be considered when reviewing alternative boundaries:

The location of the urban growth boundary and changes to the boundary shall be determined by evaluating alternative boundary locations consistent with ORS 197A.320 and with consideration of the following factors:

- (1) Efficient accommodation of identified land needs;
- (2) Orderly and economic provision of public facilities and services;
- (3) Comparative environmental, energy, economic and social consequences; and
- (4) Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB.

The following sections provide an evaluation of the proposed lands, with the proposed land exchange area of subarea J.

Findings demonstrating consistency with Goal 14 Location Factors 1-4

The four Goal 14 location factors are: (1) Efficient accommodation of identified land needs; (2) Orderly and economic provision of public facilities and services; (3) Comparative environmental, energy, economic and social consequences; and (4) Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB.

The following sections provide findings showing consideration of the Goal 14 locational factors.

Factor 1: Efficient accommodation of identified land needs

Factor 1 includes characteristics such as: efficient urban development opportunities, ability to meet needs for identified housing types, and good urban form to allow for integration with the existing city.

Exhibit 29. Evaluation of Factor 1 Characteristics

אוווטור ב /. בישוממנוסו	5	
Subarea	Efficient Urban Development Opportunities	Evaluate of Efficient Accommodation of Residential Land Needs
A	Two parcels.	Subarea A is about a 650 foot distance from the Madras
	 All parcels are over 5 acres. 	UGB. It if was brought into the UGB, it would create an
	 The study area is not adjacent to the UGB. It is about 	"island" in the UGB above subarea B. This would have a
	650 feet from the existing UGB.	negative impact on Madras' urban form and would not
	 No local road connection. It is about 900 feet from the 	efficiently accommodate residential land needs.
	closest local road, NE Jask St.	
	No improved roads within subarea.	
۵	Free of constraints. Sive according to the contraints.	ae objecta bleom bae Bill odt of tacceibe of Becredels
Δ	Six parcels.	Subalea d'is aujacelli to ille ded alla would provide all
	 93% of land is in parcels 5 acres or larger. 	opportunity for extension of existing neighborhood
	 One parcel is long and narrow, spanning vertically 	development, along NE Lakeside Dr. There are no direct
	across the entire subarea and splitting off about 1/3rd	connection between Subarea B and Madras' existing
	of the western portion.	development. This subarea would not provide substantial
	 Area is adjacent to UGB. 	connections to existing and developing neighborhoods within
	 Area is adjacent to NE Loucks Rd. 	tne Madras UGB.
	 No improved roads within subarea. 	
	Minimal constraints include small portion of steep	
C	slopes and small lake/pond.	
၁	 Four parcels. 	Subarea C is 1,400 feet distance from the Madras UGB. It it
	 97% of land is in parcels 5 acres or larger. 	was brought into the UGB, it would create an "island" in the
	 Not adjacent to UGB. It is about 1,400 feet from the 	UGB for Sub-area D. This would have a negative impact on
	existing UGB.	Madras' urban form and would not efficiently accommodate
	 Adjacent to NE Lancaster Dr and NE Loucks Rd. 	residential land needs.
	 No significant constraints. 	
Ω	 Two parcels. 	Subarea D is adjacent to the UGB but that land is zoned by
	 All parcels are larger than 5 acres. 	the City as Open Space. This subarea would not provide
		substantial connections to existing and developing

{10340316-01644291;1} Madras UGB Land Swap Findings ECONorthwest

Subarea		Efficient Urban Development Opportunities	Evaluate of Efficient Accommodation of Residential Land Needs
	• Eas	Easternmost parcel split horizontally by subarea	neighborhoods within the Madras UGB. Additionally, this
	por	boundary.	subarea would create an extension to the UGB without
	• Adj	Adjacent to UGB.	connection with the rest of the UGB. It would have a negative
	NE.	NE Dove Dr runs vertically through area, splitting off	impact on Madras' urban form and would not efficiently
	apc	about 1/3rd of the western portion.	accommodate residential land needs.
	• Adj	Adjacent to NE Loucks Rd.	
	• Fre	Free of constraints.	
Ш	• Six	Six parcels.	Subarea E is adjacent to the UGB and would provide an
	• Abc	About 90% of land is in parcels 5 acres or larger.	opportunity for extension of existing neighborhood
	• Ode	Oddly shaped parcel under 5 acres to the north of NE	development along NE Bean Dr. Additionally, it would fill in a
	ρο Ο	Dove Dr.	small gap within the eastern UGB boundary, but a majority of
	• Eas	Easternmost parcel split horizontally by subarea	tne area would be adjacent to city-zoned open space.
	por	boundary.	
	• Adj	Adjacent to UGB.	
	• Dir	Direct road connection for UGB by way of NE Bean Dr	
	anc	and NE Richard Ln.	
	• NE	NE Dove Dr continues into this subarea.	
	%0	2% of land in the eastern nortion constrained by steen	
	ols	z % or iana in the castern portion constrained by steep slopes over 15%.	
Ł	• Thr	Three parcels.	Subarea F is minimally adjacent to the UGB, sharing only
	• 95	95% of land is in parcels 5 acres or larger.	about 350 feet of coverage between the two boundaries.
	• Eas	Easternmost parcel split horizontally by subarea	Bringing this area into the UGB would create an eastward
	por	boundary.	extension of the UGB without contiguous areas to the north
	• Are	Area is only minimally adjacent to UGB.	or south. This would have a negative impact on Madras'
	• Sul	Subarea is about 1,300 feet from the closest improved	urban jorm and would not efficiently accommodate residential land needs
	roa	road within the UGB, E Ashwood Rd.	
	• Sul	Subarea only has unimproved dirt roads.	
	%6 •	9% of land is constrained by steep slopes over 15% in	
	the	the southwestern portion and in the eastern portion by	
5	TWL	a br A cascillent that cuts across the area. Two parcels	Subarea G is adjacent to the UGB but would further extend
	=		Out a parrow branch of the IICB. The area is not close to any
	• A	All parcels are larger than 5 acres.	out a figure with the control of the
	• 80	Botn parcels are split by subarea boundary.	existing restrict that development and does not provide all a would not officiently accommodate residential land needs
	• Adj	Adjacent to UGB.	wood not chieffing accommodate to state failed recess,
	• S01	Southern boundary of area is adjacent to Ashwood Rd.	

Subarea	Efficient Urban Development Opportunities	Evaluate of Efficient Accommodation of Residential Land Needs
	 No improved roads within subarea. 14% of land is constrained by steep slopes over 15% and a BPA easement that cuts diagonally across the area. 	therefore it would have a negative impact on Madras' urban form.
Τ	 One parcel. Parcel is larger than 5 acres. Parcel is split by area boundary. Adjacent to UGB. Northern boundary of area is adjacent to E Ashwood Rd. No improved roads within subarea. About 5% of the land is constrained by a BPA easement that runs diagonally across the area. 	Subarea H is adjacent to the UGB and its exchange into the UGB for the area that the City has requested to remove from the UGB and would only connect to the existing UGB towards the north and a bit on the northwest. The area is not close to any existing residential development and would not efficiently accommodate residential land needs. It would have a negative impact on Madras' urban form.
_	 One parcel. Parcel is larger than 5 acres. Parcel is split by area boundary. Not adjacent to UGB, though area corners nearly touch. E Ashwood Dr runs through the north section of the area. 8% of the land is constrained, primarily by a BPA easement that runs across the northwestern portion. 	Subarea I is not adjacent to the UGB. It if was brought into the UGB, it would create an "island" in the UGB for subarea H. This would have a negative impact on Madras' urban form and would not efficiently accommodate residential land needs.
	 One parcel. Parcel is larger than 5 acres. Parcel is split by area boundary. Adjacent to UGB. Nearby access to SE Yarrow Ave. No improved roads within subarea. About 6% of land is constrained, primarily by a BPA easement that runs across the southern portion. 	Subarea J is adjacent to the UGB and would provide an opportunity for extension of existing neighborhood development, along SE Yarrow Ave, with direction connection via that road. It is surrounded by City zone Planned Residential Development (R3) and fills in an existing gap in the UGB boundary. If brought into the UGB, the Bean Foundation plans to include it in the Yarrow Master Plan as an area for future housing development.
		Bringing this area into the UGB would have a positive impact on Madras' urban form and would efficiently accommodate residential land needs, given the proposal to include the area in the Yarrow Master Plan and the opportunities to connect with city infrastructure (documented in Exhibit 30).

Subarea		Efficient Urban Development Opportunities	Evaluate of Efficient Accommodation of Residential Land Needs
¥	•	One parcel.	Subarea K is about a 2,000-foot distance from the Madras
	•	Parcel is larger than 5 acres.	UGB once the area that the City is requesting to exchange out
	•	Parcel is split by area boundary.	is removed. It if was brought into the UGB, it would create an
	•	Not adjacent to UGB. Area is at least 2,000 feet from	"island" in the UGB for subareas H, J, and the area to be
		the UGB line, sans area that is being sought to	exchanged out. This would have a negative impact on
		exchange out.	Madras urban lorm and would not elliciently accommodate
	•	No nearby road infrastructure. Closest improved road is	residential fand needs.
	•	about 1,300 leet away: No improved roads within subarea.	
	•	2% of land is constrained by steep slopes over 15% in	
	_	eastern portion.	
_	•	Three parcels.	Subarea K is about a 2,100 ft. distance from the Madras
	•	More than 99% of land is in parcels 5 acres or larger.	UGB once the area that the City is requesting to exchange out
	•	All parcels split by area boundary.	is removed. It if was brought into the UGB, it would create an
	•	Westernmost parcel is thin and narrow strip.	"Island" in the UGB for subareas J and M, or H and K. This
	•	Not adjacent to UGB. Area is at least 2,100 feet from	would have a negative impact on Madras' urban form and
		the UGB line, sans area that is being sought to	would not efficiently accommodate residential land needs.
		exchange out.	
	•	No access to local roads. The closest improved road is	
		3,000 feet north to E Ashwood Rd.	
	•	No improved roads within subarea.	
	•	8% of land is constrained by steel slopes over 15% in	
		southwestern portion.	
Σ	•	One parcel.	Subarea M would not be adjacent to the UGB once the area
	•	Parcel is larger than 5 acres.	the City is seeking to have exchanged out is removed, though
	•	Parcel split by area boundary.	corners of both boundaries would be touching diagonally.
	•	Area adjacent to UGB area that City is seeking to	Additionally, the area is not close to any existing residential
		exchange out.	development and would not efficiently accommodate
	•	No access to local roads. The closest improved road is	residential land needs. This subarea is bisected by areas with
		about 2,300 feet out to SE Yarrow Ave.	slopes greater trial 23.%, maning corresive residential development challenging It would have a pegative impact on
	•	No improved roads within subarea.	development chanenging, it would have a negative impact on. Madrae' inhan form
	•	24% of land is constrained by steep slopes over 15%	Madias dibail Idili.
		and a BPA easement.	
Z	•	Two parcels.	Subarea N is about a 1,800 ft. distance from the existing
	•	All parcels are larger than 5 acres.	UGB boundary. If it was brought into the UGB, it would create

Evaluate of Efficient Accommodation of Residential Land Needs	an "island" in the UGB for subarea J and M. This would have a negative impact on Madras' urban form and would not efficiently accommodate residential land needs	-				Subarea 0 is adjacent to the UGB boundary and is adjacent	directly adjacent to SE Grizzly Road and in close proximity to	a roundabout where Grizzly RD, SE J St, and SE Cityview Dr	converge. However the area is not close to any existing residential development and would not provide an	opportunity for the extension of existing neighborhoods. If	or ough, into the Madras Juds, it would have a neutral impact on Madras' urban form.	Subarea P is not adjacent to the UGB, though corners of both	boundaries are touching diagonally. It has a direct local road	connection due to SE Grizzly Rd running across its boundary. If brought into the UGB, it would at best create a "cherry	stem". This would have a negative impact on Madras' urban	_	e lieeus	DI.	Subarea Q is adjacent to the UGB, though it is adjacent to	City-zoned Open Space. The area is not close to any existing residential development and is also significantly constrained	The area is bisected by the 100 Year Floodplain and a	riparian corridor, making much of the subarea into the UGB	disalitable to restacting acverabilient.
Efficient Urban Development Opportunities	Parcels split by area boundary. Not adjacent to UGB. Area is about 1,300 feet distance	 to the existing use boundary. Not adjacent to local roads. The closest improved road 	is about 1,800 feet to the area's west at SE Grizzly Road.	 No improved roads within subarea. 	 14% of land is constrained by steep slopes over 15% and a BPA easement. 	• Four parcels.	 99% of land is in parcels 5 acres of larger. Easternmost parcel split by area houndary 	Adjacent to UGB.	Western side adjacent to SE Grizzly Rd, with potential	 allect connection at no times floundabout. No improved roads within subarea. 	3% of land is constrained by steel slopes over 15% and a BPA easement.	Three parcels.	All parcels are larger than 5 acres.	 Easternmost parcel split by area boundary. Not adjacent to IICR though the areas are directly. 	 Not adjacent to oce, inough the areas are directly diagonal at corner points. 	SE Grizzly Rd cuts across the southern portion of land.	2% of land is constrained by steep slopes over 15%, the	FEMA regulatory floodway and TUU-year floodplains, and the 50-foot Willow Creek riparian corridor.	One parcel.	Parcel is larger than 5 acres. Adjacent to 100.	 Adjacent to SF Graziv Rd at the top half of the eastern 	side and adjacent to McTaggart Rd along the western	side.
Subarea						0						Ь							O				

Subarea		Efficient Urban Development Opportunities	Evaluate of Efficient Accommodation of Residential Land Needs
	•	47% of land is constrained by the FEMA regulatory floodway and 100-year floodplains, and the 50-foot Willow Creek riparian corridor.	If brought into the UGB, it would have a negative impact on Madras' urban form and would not efficiently accommodate residential land needs.
ಜ	• •	Four parcels. 94% of land is in parcels 5 acres or larger.	Subarea R is adjacent to the UGB and would provide an opportunity for the extension of existing neighborhood
	•	Northernmost two parcels are irregular in shape and small in size.	development along Leisek way, of wnich is zoned as Single- Family Residential (R-1). The area is also adjacent to SE
	• •	Southernmost parcel split by area boundary. Adjacent to LIGB.	McTaggart Rd. If brought into the UGB, it would have a positive impact on Madras' urban form and could
	•	Adjacent to SE McTaggart Rd along the eastern side with a potential direct connection to leisek Way on the	accommodate residential land needs.
		western side.	
	•	No improved roads within subarea.	
(•	5% of land is constrained by steep slopes over 15%.	
s	•	One parcel.	Subarea S is not adjacent to the UGB, though corners of both
	•	Parcel is larger than 5 acres.	boundaries are touching diagonally. The closest direct
	•	Not adjacent to UGB, though the areas are directly diagonal at corner points.	confirection to the OCB is unlought the adjacent SE MC raggert. Rd, though this road is about 1,500 ft. from the UGB. The
	•	Adjacent to SE McTaggart Rd along the eastern side.	area is not close to any existing residential development and
	•	No improved roads within subarea.	If brought into the UGB, it would at best create a "cherry"
	•	7% of land is constrained by steep slopes over 15%	steff): Birriging this alea into the use would have a negative impact on Madras' urban form and would not efficiently
		along the eastern side.	accommodate residential land needs.
_	•	Four parcels.	Subarea T is adjacent to the UGB, the area of which is zoned
	•	All parcels are larger than 5 acres.	as Single-Family Residential (R-1). This area would provide an
	•	Adjacent to UGB.	Uppoliumly for the exterision of sparse existing residential
	•	Existing road connections on western side, stemming off	development along SE Steele St.
	•	HOTH SE Steele St and SE Difflick Lit. Free of constraints	
n	•	Two parcels.	Subarea U is adjacent to the UGB and would provide an
	•	97% of land is in parcel 5 acres or larger.	opportunity for the extension of existing neighborhood
	•	Parcel of 1 acre is small and irregularly placed,	development along SW Sunrise St and SW Belmont Ln, the
		Subsumed by the other, larger parcel.	area ot which is zoned as Single-Family Residential (R-1). If brought into the UGB, it would have a positive impact on
	•	Adjacetii to uob.	

Evaluate of Efficient Accommodation of Residential Land Needs	Madras' urban form and may efficiently accommodate residential land needs.
Efficient Urban Development Opportunities	 Potential road connections at SW Sunrise St and SW Belmont Ln. Existing road network within area is unimproved. Free of constraints.
Subarea	

Exhibit 30 summarizes the details of Exhibit 29 to give a high-level summary of the potential of each subarea for efficiency of urban development opportunities. Each subarea is given a rating based on the following:

- Negative: Areas that are not adjacent to the UGB, have few if any connections to existing roads within Madras, have significant development constraints, and/or are not near existing or developing residential neighborhoods
 - Neutral: Areas that are adjacent to the UGB but may not provide connections with existing or developing residential neighborhoods or may not provide connections with existing Madras roads
- Positive: Areas that are adjacent to the UGB, may fill in a "notch" in the UGB, adjacent to existing or developing residential neighborhoods, and/or have connections with existing Madras roads

Exhibit 30. Summary of Efficiency of Urban Development Opportunities (Factor 1)

Key Issues or Onnortunities		Not adjacent to UGB, distance from UGB, no connections to existing UGB	Little direct connections with Madras' existing neighborhoods to build on.	Not adjacent to UGB, distance from UGB, no connections to existing UGB	Adjacent to UGB but would not provide substantial connections with existing or developing neighborhoods	Adjacent to UGB but would not provide substantial connections with existing or developing neighborhoods	e Not adjacent to UGB, distance from UGB, no connections to existing UGB	Adjacent to UGB but would not provide substantial connections with existing or developing neighborhoods	Adjacent to UGB but would not provide substantial connections with existing or developing neighborhoods	e Not adjacent to UGB, distance from UGB, no connections to existing UGB	Adjacent to the UGB, adjacent to and an extension of the Yarrow residential development, with the Bean	Foundation's plans for development of the area.	e Not adjacent to UGB, distance from UGB, no connections to existing UGB	e Not adjacent to UGB, distance from UGB, no connections to existing UGB	e Not adjacent to UGB, distance from UGB, no connections to existing UGB	Not adjacent to IICR distance from IICR no connections to existing IICR
High Level	Summary	Negative	Neutral	Negative	Neutral	Neutral	Negative	Negative	Negative	Negative	Positive		Negative	Negative	Negative	Negative
Subarea	5	Α	В	O	Ω	Е	Ч	ŋ	I	_	<u> </u>		\checkmark	7	Σ	Z

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Key Issues or Opportunities	Adjacent to the UGB but distant from existing or upcoming development	Not adjacent to UGB, distance from UGB, no connections to existing UGB	Adjacent to the UGB but bisected by floodplain and riparian corridor	Adjacent to the UGB and existing R-1 development, with connections to Madras roads	Not adjacent to UGB, distance from UGB, no connections to existing UGB	Adjacent to the UGB but limited nearby residential development, some connections with Madras roads	Adjacent to the UGB and existing R-1 development, with connections to Madras roads
High Level Summary	Neutral	Negative	Negative	Positive	Negative	Neutral	Positive
Subarea	0	Ь	O	2	S	_	Π

Factor 1 Finding

The City finds that subarea J provides the best opportunities for development at planned densities and also provides opportunities to connect to an existing R-3 zoned neighborhood.

Subareas R and U provide opportunities for development at planned densities but are adjacent to existing R-1 development.

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Factor 2: Orderly and economic provision of public facilities and services

focuses on provision of roads, water, and wastewater services and evaluates the advantages and disadvantages for each subarea for Factor 2 requires the City to consider opportunities for orderly and economic provision of public facilities and services. This section these services.

Subarea	Subarea Roads	Municipal Water	Sanitary Sewer and Wastewater Services
A	Advantages Relatively flat, without steep slopes Disadvantages No existing roads in the subarea. ODOT not likely to grant access for local streets to connect Hwy 97. Only collector streets. Access to the subarea would require access through subarea B, creating a cherry stem to the area.	Advantages • Deschutes Valley Water District (DVWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer would need to construct needed water service distribution system, increasing development costs	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. Disadvantages • No existing sewer collection system adjacent or in Subarea. • Requires extension of sewer main from Hwy 97 and Loucks Road to Subarea, about a 1,300 ft. distance. • Developer to pay for "to and through" sewer extension, which may result in higher cost than can be accommodated by the developer, making the development financial infeasible.
Ω	Advantages • Subarea directly adjacent to existing Loucks Road. Disadvantages • Eastern & western portion of Subarea are separated by narrower portion of Subarea in the middle, creating an area that is more difficult for new roads. • Extending roads "to and through" will be challenging and limit development, which may result in	Advantages Deschutes Valley Water District (DWWD) is service provider. Disadvantages No existing municipal water infrastructure and DWWD does not have any planned water distribution projects planned in Subarea. Developer to construct needed water service distribution system.	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. • Existing sewer main adjacent to southwest corner of Subarea. Disadvantages • Requires significant extension of sewer main from Loucks Road to Subarea. • Likely requires sewer main to be extended to the east to serve eastern portion of Subarea.

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Sanitary Sewer and Wastewater Services	Developer to pay for "to and through" significant sewer extension, which may result in higher cost than can be accommodated by the developer, making the development financial infeasible.	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. Disadvantages • Requires significant extension of sewer main from Loucks Road to Subarea. • Developer to pay for "to and through sewer extension, which may result in higher cost than can be accommodated by the developer, making the development financial infeasible.	Adva • Diss
Municipal Water		Advantages • Deschutes Valley Water District (DVWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system.	Advantages Deschutes Valley Water District (DVWD) is service provider. Disadvantages No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. Developer to construct needed water service distribution system.
Roads	higher cost than can be accommodated by the developer, making the development financial infeasible.	Advantages • Street network not established Disadvantages • Very little transportation planning completed in Subarea. • Access to the subarea would require access through subarea D, creating a cherry stem to the area. • Active irrigation canal on Subarea will need to be avoided when developed or developed or developed to pay for piping.	Advantages Street network not established Existing north/south road bisects Subarea. Disadvantages Street network not established Roundabout planned at realigned Bean Drive and Loucks Road, which would require private property dedication to the right-of-way, limiting amount of land for development and increasing the costs of the roundabout. Underground federal irrigation pipe bisects Subarea. Significant slope separates east and west areas of Subarea.
Subarea		O	Ω

Subarea	Roads	Municipal Water	Sanitary Sewer and Wastewater Services
	 Subarea has significant frontage to Bean Drive and Loucks Road for which will need to be improved at time of development. Frontage and internal street network to be constructed by developer. 		
ш	Advantages Street network not established Disadvantages Street network not established. Very little frontage/access to existing roads. Significant slope on eastern portion of Subarea limits development potential.	Advantages • Deschutes Valley Water District (DVWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system.	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. Disadvantages • Requires very significant extension of sewer main from Loucks Road, then south in Bean Drive to Subarea. • Developer to pay for "to and through" significant sewer extension, which may result in higher cost than can be accommodated by the developer, making the development financial infeasible.
L	Advantages Existing rural street network established in Subarea. Disadvantages Access to the subarea would require access through Subareas D and or E. Any significant development would require Loucks Road improvements (off-site). Existing rural street network in Subarea not likely to support urban development and needed street network. Significant slopes in subarea would increases the costs of roads.	Advantages • Deschutes Valley Water District (DVWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system. • Significant slopes in subarea would increases the costs of municipal water.	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. Disadvantages • Requires very significant extension or Ashwood Bean Drive to Subarea. • Developer to pay for "to and through sewer extension, , which may result in higher cost than can be accommodated by the developer, making the development financial infeasible • Development dependent on sewer being extended to serve Subareas E or G.

Sanitary Sewer and Wastewater Services	 Significant slopes in subarea would increases the costs of wastewater service. 	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. • Likely can connect to Ashwood gravity main. Disadvantages • Steep slopes will make serving property challenging. • Development likely dependent on sewer being extended to serve Subarea H. • Developer to pay for "to and through sewer extension, , which may result in higher cost than can be accommodated by the developer, making the development financial infeasible	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. • There is an existing master plan to guide sewer system development. Disadvantages • Sewer service dependent on a costly sewer lift station planned near the northern boundary between Subareas H and I in Ashwood Road, which may take a decade or longer to build. • Gravity sewer service dependent on sewer being extended from development to the west and slopes that are conducive to gravity service.
Municipal Water		Advantages • Deschutes Valley Water District (DVWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system.	Advantages • Deschutes Valley Water District (DVWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system.
Roads	 No existing street network. 	Advantages • Ashwood Rd. fronts Subarea. Disadvantages • Existing land in UGB to the west of Subarea is not developed. • Significant slopes in subarea. • The slopes in the subarea will make it more costly to extend Ashwood Road into the subarea (or build other connector roads). • No existing street network.	Advantages Subarea has gentle southeast to northwest slope. Few development constraints other than infrastructure not being adjacent to Subarea. Disadvantages Existing land in UGB to the west of the Subarea has no existing infrastructure or existing development. No existing street network.
Subarea		9	т

Sanitary Sewer and Wastewater Services	 Significant "to and through" sewer extension required, , which may result in higher cost than can be accommodated by the developer, making the development financial infeasible 	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. • Master Plan to guide sewer system development. Disadvantages • Sewer service dependent on sewer lift station planned near the northern boundary between Subareas H and I in Ashwood Road. • Gravity sewer service not likely to be feasible and the area would require expensive pump station.	Advantages • Subarea not developed and wastewater collection system can be developed most efficiently based on existing sewer infrastructure in the nearby Yarrow development. • Master Plan to guide sewer system development, with nearby planned sewer lines. • Gravity sewer service to be minimally extended from Yarrow/Bean Drive intersection to serve Subarea.
Municipal Water		Advantages • Deschutes Valley Water District (DVWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system.	Advantages • Deschutes Valley Water District (DVWD) is service provider. • Opportunity to connect to the DVWD the nearby water main on Yarrow Avenue. Disadvantages • DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system.
Roads		Advantages Advantages Existing land in UGB to the west of Subarea is not developed. Access to the subarea would require access through Subareas H and new street network to connect to Ashwood Road, creating a cherry stem to the area. Subarea has gentle southeast to northwest slope. Access to Subarea will occur through two connections to Ashwood Road on west side of Subarea and on east outside of Subarea and on east outside of Subarea.	Advantages • Yarrow Avenue terminates at western boundary of Subarea. • Can extend infrastructure into Subarea from western boundary of the Subarea. • Potential for integration with road network developed in existing neighborhood. • Subarea has gentle southeast to northwest slope.
Subarea		_	_

Sanitary Sewer and Wastewater Services	 Subarea not developed and wastewater collection system can be developed to serve development most efficiently. Master Plan to guide sewer system development. Significant "to and through" sewer extension required, which may result in higher cost than can be accommodated by the developer, making the development financial infeasible. 	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. • Master Plan to guide sewer system development. Disadvantages • Sewer service dependent on sewer lift station planned near the northern boundary between Subareas H and I in Ashwood Road, about a 2,500 ft. distance. • Sewer service dependent on gravity mains being extended from Subarea I to Subarea K.	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. • Master Plan to guide sewer system development. Disadvantages • Sewer service dependent on sewer lift station planned near the northern boundary between Subareas H and I in
Municipal Water		Advantages • Deschutes Valley Water District (DVWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system.	Advantages • Deschutes Valley Water District (DVWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system.
Roads	The City's TSP includes plans for an extension to Bean Drive, which can serve the western portion of the Subarea. Disadvantages New street network needs to connect to existing Yarrow subdivision street network.	Advantages • Subarea has gentle southeast to northwest slope. • No existing street network. Disadvantages • Access to the subarea would require access through Subareas J and H, creating a cherry stem to the area. • No existing street network.	Advantages • Subarea mostly has gentle southeast to northwest slope. Disadvantages • Access to the subarea would require access through Subareas K and M, creating a cherry stem to the area.
Subarea			7

Subarea	Roads	Municipal Water	Sanitary Sewer and Wastewater Services
			Ashwood Road, about a 4,000 ft. distance. • Sewer service dependent on gravity mains being extended from Subarea I and K to Subarea L.
Σ	Advantages • Significant slopes on at least 40% of Subarea. • No existing street network. Disadvantages • Access to the subarea would require access through Subareas J and O, creating a cherry stem to the area. • Existing land in UGB to the northwest of Subarea is not developed. • No existing street network. • The steep slopes in the subarea would increase the costs of new roads substantially.	Advantages • Deschutes Valley Water District (DVWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system. • The steep slopes in the subarea would increase the costs of connecting to the municipal water system.	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. • Master Plan to guide sewer system development. Disadvantages • Sewer service dependent on sewer service being extended to and through Subarea J, about a 2,700 ft. distance. • Significant "to and through" sewer extension required, which may result in higher cost than can be accommodated by the developer, making the development financial infeasible. • The steep slopes in the subarea would increase the costs of connecting to the municipal wastewater system.
Z	Advantages • Significant slopes on at least 50% of Subarea. • No existing street network. Disadvantages • Access to the subarea would require access through Subareas O and M, creating a cherry stem to the area. • Existing land in UGB to the northwest of Subarea is not developed. • No existing street network.	Advantages • Deschutes Valley Water District (DWWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system.	 Advantages Subarea not developed and wastewater collection system can be developed to serve development most efficiently. Master Plan to guide sewer system development. Disadvantages Sewer service dependent on sewer service being extended to and through Subareas J, M, O, or P. Significant "to and through" sewer extension required, which may result in higher cost than can be accommodated

Subarea	Roads	Municipal Water	Sanitary Sewer and Wastewater Services
			by the developer, making the development financial infeasible.
0	Advantages • Subarea fronts Grizzly Road. • No existing street network. Disadvantages • Moderate westerly slope in Subarea but eastern portion of Subarea has more significant slopes. • Would require street network to be connect to Yarrow Master Plan and subdivision street networks. • Existing land in UGB to the north is not developed.	Advantages • Deschutes Valley Water District (DVWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system.	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. • Development likely to connect into existing sewer main in Yarrow Avenue Disadvantages • Subarea outside of Yarrow Master Plan area and therefore collection system serving development does not exist. • Significant "to and through" sewer extension required, which may result in higher cost than can be accommodated by the developer, making the development financial infeasible.
Ф.	Advantages • Subarea fronts Grizzly Road. • No existing street network. Disadvantages • Existing land in UGB to the north and northwest are not developed. • No existing street network. • Access to the subarea would require access through Subareas O or Q, creating a cherry stem to the area.	Advantages • Deschutes Valley Water District (DVWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system.	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. Disadvantages • Sewer main serving development to connect to Yarrow Avenue sewer main. • Significant "to and through" sewer extension required, , which may result in higher cost than can be accommodated by the developer, making the development financial infeasible.
O	Advantages • Subarea fronts both McTaggart and Grizzly Roads. Disadvantages	Advantages • Deschutes Valley Water District (DVWD) is service provider. Disadvantages	 Advantages Subarea not developed and wastewater collection system can be developed to serve development most efficiently.

Subarea	Roads	Municipal Water	Sanitary Sewer and Wastewater Services
	Street network to connect to both McTaggart and Grizzly Roads while crossing Willow Creek and the associated floodplain in several locations. Higher costs for the frontages on these streets.	No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. Developer to construct needed water service distribution system. The floodplain for Little Creek creates a disadvantage for municipal water, as it would require a costly crossing of the Creek.	Sewer to connect to J Street sewer main near McTaggart/J Street intersection. Requires significant sewer extension. May require City to grant easement to extend sewer across City McTaggart farm property. The floodplain for Little Creek creates a disadvantage for municipal water, as it would require a costly crossing of the Creek.
	 Advantages Subarea fronts McTaggart Road. Disadvantages Existing developments west of Subarea that are in the city limits are not able to connect/extend streets into Subarea. Higher costs of upgrading McTaggart Road from a County to a city road. Significant slopes on 30% of Subarea. 	Advantages • Deschutes Valley Water District (DWWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system.	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. Disadvantages • Sewer to connect to J Street sewer main near McTaggart/J Street intersection.
	Advantages Gentle southeast slope. Subarea fronts McTaggart Road. No existing street network. Disadvantages Street network to connect to street networks in Subareas R and T that do not exist today. Access to the subarea would require access through Subareas R or T, creating a cherry stem to the area. No existing street network.	Advantages • Deschutes Valley Water District (DWWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system.	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. Disadvantages • Sewer to connect to J Street sewer main near McTaggart/J Street intersection. Requires significant sewer extension. • Sewer service dependent on sewer service being extended to and through Subareas O or R.

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Sanitary Sewer and Wastewater Services	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. Disadvantages • Sewer service dependent upon sewer being extended to and through the property in the city limits directly to the north of the Subarea or to and through Subarea R or S. • Extension of the needed sanitary sewer system would be 1,300 feet or more.	Advantages Subarea not developed and wastewater collection system can be developed to serve development most efficiently. Disadvantages Sewer service dependent upon sewer being extended to and through the property in the city limits directly to the south. Might require increase sewer capacity for the southwest part of the city beyond existing collection system.
Municipal Water	Advantages Deschutes Valley Water District (DVWD) is service provider. Disadvantages No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. Developer to construct needed water service distribution system, likely by 1,300 feet or more.	Advantages • Deschutes Valley Water District (DVWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system.
Roads	Advantages No existing street network. Disadvantages Existing land in UGB to the north is not developed. No existing street network. Tuture street network to connect to existing roads to the west and north.	 Advantages No existing street network. Disadvantages Significant southeasterly slope on at least 40% of Subarea. No existing street network. Future street network to connect to development in city limits to the south and east of Subarea. Both are largely undeveloped. Development to would need to pay some of the costs of a to Belmont/Culver Hwy Roundabout
Subarea	F	n

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Exhibit 32 shows the relative costs for infrastructure development in each subarea depending on whether there are opportunities to connect to existing infrastructure or need to develop new infrastructure.

- Low cost is a subarea where there is existing adjacent infrastructure to connect into.
- Middle costs are where there is not existing adjacent infrastructure to connect into but there may be some physical constraint such as slopes that raise the costs of infrastructure development.
- High cost is a subarea where there is not existing adjacent infrastructure, infrastructure extension would be at least ¼ mile, and infrastructure improvements may require costly investments like roundabouts or lift stations. There may be some physical constraint such as slopes that raise the costs of infrastructure development.

Exhibit 32. Relative Costs of Infrastructure Development

Subarea	Roads	Municipal Water	Sanitary Sewer and
			Wastewater Services
Α	High	High	High
В	Middle	Middle	Middle
С	High	High	High
D	High	High	High
Е	High	High	High
F	High	High	High
G	High	High	Low
Н	Low	Middle	Middle
I	High	High	High
J	Low	Low	Low
K	High	High	High
L	High	High	High
M	High	High	High
N	High	High	High
0	Middle	Middle	Middle
Р	High	High	High
Q	High	High	High
R	Middle	High	High
S	High	High	High
T	High	High	High
U	High	High	High

Factor 2 Finding

The City finds that subarea J would provide the best opportunities for using existing connections to public services and is the most economical (least costly) location for Madras' UGB land swap when considering provisions for roads, water, and wastewater services.

Factor 3: Comparative environmental, energy, economic and social consequences

Environmental consequences

Environmental consequences of residential development will be lesser on subareas adjacent to the UGB, where there is existing and developing residential neighborhoods, especially in areas outside of the floodplain, riparian areas, or other environmentally sensitive areas.

The areas that are adjacent to the Madras UGB on at least two sides are B, E, H, J, O, R, and U. Of these, subareas B, R, and U have active agricultural activity on the subareas. Areas E, H, J, and O are the areas that are likely to have lower environmental consequences for urbanization.

Subarea J will be part of the Yarrow Master Plan, which envisions planting street trees and inclusion of parks and open space within the Master Plan area.

Energy consequences

Environmental consequences of residential development will be lesser on subareas adjacent to the UGB, where there is existing and developing residential neighborhoods and infrastructure. Subareas that could connect into existing roads, water systems, and wastewater would have lower comparative energy consequences. Subarea J is best positioned to connect into existing road systems, water system, and wastewater system. The location of subarea J relative to the Yarrow Master Plan area (which is one of Madras growth areas) is positioned to require less travel and energy consumed by mechanical and pumping for water or wastewater services), compared with locating residences in areas that are further from City services. In addition, the planned city park and school near the Yarrow Master Plan provide opportunities to access some services relatively near subarea J.

Economic consequences

The economic consequences of expanding the UGB for residential uses to subarea J are positive. The areas will provide opportunity for additional housing construction, which will support the construction industry. Moreover, providing adequate housing in diverse housing types in Madras supports the City's housing policies. Subarea J is less costly to provide public services (as discussed in Exhibit 32).

Subarea J will be part of the Yarrow Master Plan, which will provide an extension of a developing neighborhood, with a mixture of lot and unit sizes, as well as potential future commercial uses. The Yarrow Master Plan envisions development of housing affordable across the income spectrum, including comparatively affordable types, such as small and medium lots, as well as multifamily housing.

Social consequences

The land exchange will provide opportunities for building a wider variety of housing types. Adding new households to the community will have positive social benefits, such as supporting

community activities and local businesses. Such impacts would presumably occur regardless of the location of new residential land, however, the proximity of subarea J relative to existing uses provides a higher level of social benefit, as part of the Yarrow Master Plan area. Subarea J provides more positive social consequences because of its planned connections with existing residential areas and positive impact on the urban form and a better connected transportation system in Madras (as discussed under Factor 2).

Factor 3 Findings

The City finds that subarea J has positive social consequences (including development as part of the Yarrow Master Plan with a range of housing types), better opportunities for energy efficiency (in connecting to existing transportation, water, and wastewater systems), positive economic consequences (from being relatively cost efficient and providing housing types that may be affordable), and lower likely environmental impacts.

Factor 4: Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the urban growth boundary

The following summarizes the compatibility of the proposed residential land exchange with nearby agricultural and forecast activities around each subarea.

- Subarea A is being used for carrot seed farming and portions of Subarea B are in active farm use for hay, wheat, and carrot seed. To the north of Subarea A across Highway 97, the primary use of the farmland is fallow/idle and shrubland, though alfalfa is also being grown. The proposed residential uses would not be compatible with on-going agricultural uses in Subarea B or in Subarea A. The proposed residential uses would be compatible with fallow and shrubland agricultural uses to the north of Subarea A.
- Subarea B is adjacent to the City. Two-thirds of this area is in active farm use primarily growing winter wheat, as well as hay and carrot seed. The proposed residential uses would not be compatible with on-going agricultural uses in Subarea B. But would be compatible with adjacent agricultural uses in Subarea A.
- Subarea C is primarily shrubland, with some agricultural uses on the western side for alfalfa and non-alfalfa hay. The surrounding area to the east is primarily shrubland. The proposed residential uses would preclude rangeland use where the development occurs but would be a compatible adjacent on-going use in the subarea that would not brought into the UGB and adjacent subareas.
- Subarea D is primarily shrubland with some agricultural uses on the eastern side for
 dryland and winter wheat when irrigation water is available. The surrounding area to
 the east is primarily shrubland. The proposed residential uses would preclude
 rangeland use where the development occurs but would be a compatible adjacent ongoing use in the subarea that would not brought into the UGB and adjacent subareas.
- Subarea E is primarily used as range land. The area to the east of Subarea E, Subarea F, mostly contains shrubland. The proposed residential uses would preclude rangeland

use where the development occurs but would be a compatible adjacent on-going use in the subarea that would not brought into the UGB and adjacent subareas.

- Subarea F is primarily used as range land. The area to the east of Subarea F mostly contains shrubland. The proposed residential uses would preclude rangeland use where the development occurs but would be a compatible adjacent on-going use in the subarea that would not brought into the UGB and adjacent subareas.
- Subarea G is primarily used as range land. The area to the east of Subarea F mostly contains shrubland. The proposed residential uses would preclude rangeland use where the development occurs but would be a compatible adjacent on-going use in the subarea that would not brought into the UGB and adjacent subareas.
- Subarea H is primarily shrubland, with a small portion being use for rangeland. The
 proposed residential uses would preclude rangeland use where the development occurs
 but would be a compatible adjacent on-going use in the subarea that would not brought
 into the UGB and adjacent subareas.
- Subarea I is primarily used as range land. The area to the east of Subarea I mostly contains shrubland. The proposed residential uses would preclude rangeland use where the development occurs but would be a compatible adjacent on-going use in the subarea that would not brought into the UGB and adjacent subareas.
- Subarea J is primarily shrubland. The proposed residential uses would preclude rangeland use where the development occurs but would be a compatible adjacent ongoing use in the subarea that would not brought into the UGB and adjacent subareas.
- Subarea K is primarily used as range land. The area to the east of Subarea K mostly contains shrubland. The proposed residential uses would preclude rangeland use where the development occurs but would be a compatible adjacent on-going use in the subarea that would not brought into the UGB and adjacent subareas.
- Subarea L is primarily used as range land. The proposed residential uses would
 preclude rangeland use where the development occurs but would be a compatible
 adjacent on-going use in the subarea that would not brought into the UGB and adjacent
 subareas.
- Subarea M is primarily used as range land. The proposed residential uses would
 preclude rangeland use where the development occurs but would be a compatible
 adjacent on-going use in areas of Subarea M not brought into the UGB.
- Subarea N is primarily used as range land. The area to the east of Subarea N mostly
 contains shrubland. The proposed residential uses would preclude rangeland use where
 the development occurs but would be a compatible adjacent on-going use in the subarea
 that would not brought into the UGB and adjacent subareas.
- Subarea O is primarily used as range land. The proposed residential uses would preclude rangeland use where the development occurs but would be a compatible

adjacent on-going use in the subarea that would not brought into the UGB and adjacent subareas.

- Subarea P is primarily used as range land. The proposed residential uses would
 preclude rangeland use where the development occurs but would be a compatible
 adjacent on-going use in the subarea that would not brought into the UGB and adjacent
 subareas.
- Subarea Q is being actively used for agricultural using wastewater from the City's south wastewater treatment plant. The area is primarily used to grow alfalfa, as well as carrot seed. Land to the south of Subarea Q is also used for the growth of alfalfa. The proposed residential uses would preclude agricultural uses where the development occurs but would be a compatible adjacent on-going use in the subarea that would not brought into the UGB and adjacent subareas.
- Subarea R its land is used for the growth of alfalfa and hay, though much of the area is shrubland. The proposed residential uses would preclude agricultural uses where the development occurs but would be a compatible adjacent on-going use in the subarea that would not brought into the UGB and adjacent subareas.
- Subarea S is primarily used as range land. The proposed residential uses would
 preclude rangeland uses where the development occurs but would be a compatible
 adjacent on-going use in the subarea that would not brought into the UGB and adjacent
 subareas.
- Subarea T has some small scale agriculture, particularly in the northern portion that lays
 directly adjacent to the City. This agricultural use involves the growth of wheat and
 alfalfa, as well as some rangeland. The proposed residential uses would preclude
 agricultural and rangeland uses where the development occurs but would be a
 compatible adjacent on-going use in the subarea that would not brought into the UGB
 and adjacent subareas.
- Subarea U is partially being used for farming wheat and alfalfa, as well as rangeland. To the west and north of Subarea W up to SW Johnson Rd, the primary use of the farmland is shrubland. The proposed residential uses would preclude agricultural and rangeland uses where the development occurs but would be a compatible adjacent on-going use in the subarea that would not brought into the UGB and adjacent subareas.

Much of the area around the subareas is in on-going agricultural uses, either through growing crops or in rangeland. Exhibit 33 summarizes the details of the discussion above about compatibility between the proposed urban use (residential development in the R-3 zone) and agricultural uses in adjacent areas. Each subarea is given a rating based on the following:

- Negative: Areas that are not adjacent to the UGB and would extend urban uses further from the existing UGB into areas with agricultural uses.
- Neutral: Areas that are adjacent to the UGB, where new residential uses would be compatible with on-going agricultural uses outside the UGB.

Exhibit 33. Evaluation of Compatibility of Proposed Urban Use with Agricultural Uses

Subarea	Summary of Potential Impact on Agricultural Uses	Key Considerations
Α	Negative	Area not adjacent to the UGB
В	Neutral	Adjacent to the UGB, residential development would be compatible with agricultural activity outside the subarea
С	Negative	Area not adjacent to the UGB
D	Neutral	Adjacent to the UGB, residential development would be compatible with agricultural activity outside the subarea
Е	Neutral	Adjacent to the UGB, residential development would be compatible with agricultural activity outside the subarea
F	Negative	Area not adjacent to the UGB
G	Neutral	Adjacent to the UGB, residential development would be compatible with agricultural activity
Н	Neutral	Adjacent to the UGB, residential development would be compatible with agricultural activity outside the subarea
	Negative	Area not adjacent to the UGB
J	Neutral	Adjacent to the UGB, residential development would be compatible with agricultural activity outside the subarea
K	Negative	Area not adjacent to the UGB
L	Negative	Area not adjacent to the UGB
M	Negative	Area not adjacent to the UGB
N	Negative	Area not adjacent to the UGB
0	Neutral	Adjacent to the UGB, residential development would be compatible with agricultural activity outside the subarea
Р	Negative	Area not adjacent to the UGB
Q	Neutral	Adjacent to the UGB, residential development would be compatible with agricultural activity outside the subarea
R	Neutral	Adjacent to the UGB, residential development would be compatible with agricultural activity outside the subarea
S	Negative	Area not adjacent to the UGB
S T	Neutral	Adjacent to the UGB, residential development would be compatible with agricultural activity outside the subarea
U	Neutral	Adjacent to the UGB, residential development would be compatible with agricultural activity outside the subarea

Factor 4 Findings

The City finds that the subareas where there is little on-going agriculture (beyond grazing animals) in the subarea, the subareas are adjacent to the UGB on at least one side, and there is less intensive active agricultural activity in adjacent areas are subareas: D, E, H, J, and O. Development in these subareas would have a lesser effect on agricultural activities on the subareas and in adjacent subareas.

Goal 14 Factor Evaluation Summary

Exhibit 34 summarizes the evaluation of Goal 14 Locational Factors 1, 2, and 4. Based on the analysis findings presented above, Subarea J is the best alternative for Madras to meet the land need for about 40 acres of buildable residential land. It would have a positive impact on Madras' urban form and would efficiency accommodate the land need for R-3 residential land, as an area for expansion of the Yarrow Master Plan. It is the area with the lowest cost of service for roads, water, and wastewater. Subarea J has potential for positive social, economic, and energy consequences. Its location adjacent to the UGB, with little agricultural activity on subarea J or around it, beyond rangeland uses, will be compatible with agricultural activities.

Exhibit 34. Summary of Evaluation of Goal 14 Locational Criteria Factors 1, 2, and 4

Subarea	Factor 1: Impact on Efficiency	Factor 2: Costs of Service	Factor 4: Potential Impact on Agricultural Uses
Α	Negative	High	Negative
В	Neutral	Middle	Neutral
С	Negative	High	Negative
D	Neutral	High	Neutral
E	Neutral	High	Neutral
F	Negative	High	Negative
G	Negative	High	Neutral
Н	Negative	Middle	Neutral
I	Negative	High	Negative
J	Positive	Low	Neutral
K	Negative	High	Negative
L	Negative	High	Negative
M	Negative	High	Negative
N	Negative	High	Negative
0	Neutral	Middle	Neutral
Р	Negative	High	Negative
Q	Negative	High	Neutral
R	Positive	Middle	Neutral
S	Negative	High	Negative
T	Neutral	High	Neutral
U	Positive	High	Neutral

The City finds that subarea J provides the best alternative for Madras to meet the residential land needs.

5. County and City Requirements for UGB Changes

Jefferson County Comprehensive Plan

Quasi-Judicial Amendments

In order to be approved, the proposed amendment must:

 Comply with applicable Statewide Planning Goals, Oregon Revised Statutes and Administrative Rules, or comply with requirements for an exception to the goal(s);

Finding: Compliance with Statewide Planning Goals is demonstrated in Section 6 of this Narrative. Compliance with applicable Oregon Revised Statutes and Administrative Rules is demonstrated in Section of this Narrative.

2. Comply with all applicable Comprehensive Plan goals and policies; and

Goal 1

Policy 1: Strive to maximize citizen involvement during the review and amendment of the Comprehensive Plan and implementing ordinances.

Finding: The proposed UGB land exchange was presented and discussed at public hearings of the Madras Planning Commission (1/3/2024), Madras City Council (2/13/2024), Jefferson County Planning Commission (2/8/2024), and Jefferson County Board of County Commissioners (2/28/2024). Public testimony was taken at each hearing. This criterion is met.

Policy 2: Provide maximum opportunity for citizen participation in the land use permitting process.

Finding: The proposed UGB land exchange was presented and discussed at public hearings of the Madras Planning Commission (1/3/2024), Madras City Council (2/13/2024), Jefferson County Planning Commission (2/8/2024), and Jefferson County Board of County Commissioners (2/28/2024). Public testimony was taken at each hearing. This criterion is met.

Policy 3: Information on planning processes, procedures and requirements should be readily available to the public.

Finding: Information about the proposed UGB land exchange was made available to the public at hearings of the Madras Planning Commission and Madras City Council, as well as hearings of the Jefferson County Planning Commission and Jefferson County Board of County Commissioners (. This criterion is met.

Goal 3 Agricultural Lands

Policy 1: Protect agricultural and range land which presently is under production, or has the potential to be productive.

Finding: The area proposed to be brought into the UGB (subarea J) is within Madras' Urban Reserve and is "First Priority" for inclusion into the UGB according to OAR 197A.320. This criterion is met. The land removed from the UGB will be zoned Rangeland, consistent with the zoning of surrounding areas. The agricultural potential of the exchange parcels is comparable as they are comprised of similar soils. If anything, the "squaring off" that would occur as a result of the exchange would result in more contiguous agricultural lands, which would be employed more efficiently with reduced conflicts with the residential uses contemplated in the inclusion lands. This criterion is met.

Finding: The land removed from the UGB will be zoned Rangeland, consistent with the zoning of surrounding areas. This criterion is met.

Policy 2: Recognize the importance of irrigation for crop production.

Finding: The area proposed to be brought into the UGB (subarea J), which is not irrigated. This criterion is met.

Goal 10 Housing

Policy 1: Sufficient rural residential land should be provided to meet the need to accommodate population growth and the demand for rural home sites outside city limits.

Finding: The area proposed to be brought into the UGB (subarea J) was not comprehensively planned or zoned for residential use. As a result, the proposed action does not affect supplies of rural residential land. This criterion is met.

Policy 2: Criteria for rezoning lands to Rural Residential should be established.

Finding: A rezone to Rural Residential is not proposed.

Jefferson County Zoning Ordinance

803.2 Map Amendments

An amendment to the Zoning Map may be approved if it complies with the approval criteria in this Section. The burden of proof is on the applicant to submit sufficient information to demonstrate that the application complies with the approval criteria. For instance, a traffic impact study in accordance with Section 421 may be needed to show compliance with criterion (F).

A. The zoning designation will conform to the Comprehensive Plan Map designation;

Finding: The area proposed to be brought into the UGB (subarea J) was in Jefferson County's Rangeland zone. It will be brought into the UGB and zoned Planned Residential

Development (R-3) consistent with proposed Madras Comprehensive Plan Map designation. This criterion is met.

Finding: The land removed from the UGB will be zoned Rangeland, consistent with the Jefferson County Comprehensive Plan Map designation. This criterion is met.

B. The amendment is consistent with other Zoning Ordinance requirements including, but not limited to, wildlife habitat, bird habitat and riparian protection standards;

Finding: Compliance with the Jefferson County Zoning Ordinance is addressed in this section. No physical development of either of the exchange lands is proposed at this time. The exchange lands are not otherwise subject to any Goal 5 inventories. This criterion is met.

C. The amendment will cause no significant adverse impact to other properties in the vicinity due to factors such as water quality, drainage, air quality or noise;

Finding: The proposal does not include any physical development that might potentially create the foregoing impacts. Any future development of the area proposed to be brought into the UGB (subarea J) will be developed consistent the Madras Development Code, which includes development standards that address potential adverse impacts to adjacent properties. The proposal does not present adverse impacts to adjacent County-zoned properties. This criterion is met.

Finding: The proposal does not include any physical development that might potentially create the foregoing impacts. Any future development of the land removed from the UGB will be developed consistent with Jefferson County Zoning Ordinance, which includes development standards that address potential adverse impacts to adjacent properties. This criterion is met.

D. The amendment will not force a significant change in or significantly increase the cost of farming or forest practices on surrounding resource land;

Finding: The area proposed to be brought into the UGB (subarea J) is adjacent to the city's UGB on two sides and will have the area removed from the UGB to the East (which is owned by the City of Madras). The proposed development on subarea J is compatible with surrounding rangeland uses and will not force a significant change in or significantly increase costs of farming on surrounding land. If anything, the proposal will reduce the perimeter of the Madras UGB and thus the extent of the line between urban/urbanizable uses and rural/resource uses (thereby reducing potential conflicts that might result in change or increased costs of resource uses). This criterion is met.

Finding: The land removed from the UGB will be zoned Rangeland and will cause no significant change in or significantly increase costs of farming on surrounding land. If

anything, the proposal will reduce the perimeter of the Madras UGB and thus the extent of the line between urban/urbanizable uses and rural/resource uses. This criterion is met.

E. Adequate public safety, fire protection, sanitation, water and utility facilities and services are available or will be provided to serve uses allowed in the proposed zone;

Finding: The City of Madras will provide urban services to the area proposed to be brought into the UGB (subarea J), consistent with other land in the Madras UGB. This criterion is met.

Finding: The land removed from the UGB is approximately the same number of acres as subarea J, resulting in no substantial changes to County provision of services. This criterion is met.

- F. The uses allowed in the proposed zone will not significantly affect a transportation facility identified in an adopted Transportation System Plan by:
 - 1. Changing the functional classification of an existing or planned transportation facility;
 - 2. Allowing types or levels of land uses which would result in levels of travel or access which are inconsistent with the functional classification of a transportation facility; or
 - 3. Reducing the performance standards of the facility below the minimum acceptable level identified in the applicable Transportation System Plan. A Traffic Impact Study in accordance with Section 421 may be required to show compliance with this standard.

Finding: The area proposed to be brought into the UGB (subarea J) will be included in Madras TSP. The proposal is supported by a Transportation Planning Rule analysis, as discussed below, that finds none of the foregoing significant effects. This criterion is met.

Finding: The land removed from the UGB will be down zoned to Rangeland and will thus not have any of the foregoing significant effects. This criterion is met.

Madras Comprehensive Plan

<u>GOAL 1</u> - To develop a Citizen Involvement program that insures the opportunity for all citizens to be involved in all phases of the planning process.

POLICY - The City shall insure an adequate citizen involvement in all phases of the planning process. To that end, the citizen involvement program is spelled out on Pages 14 and 15 of this plan.

The City shall publicize the opportunities for citizen involvement by the following methods:

- A. The City shall post notices of Planning Commission meetings, outlining the date, time, place and topics to be discussed, on public bulletin boards within the City. This would include the City Hall, the County Courthouse, and local markets.
- B. In addition to the Oregonian and the Oregon Journal, there are two newspapers serving the area--the Madras Pioneer (a weekly), and The Bulletin (a Bend daily). Both papers have indicated a willingness to publish articles announcing meetings and general discussions of Planning Commission topics including any decisions that are rendered.
- C. Madras has a local television weather channel that allows placement of local notices. This is anticipated to provide an excellent method of notification go the general public.
- D. Local service organizations and clubs shall be informed on Planning Commission progress and discussion topics. These organizations include the Lions, Kiwanis, Chamber of Commerce, Epsilon Sigma Alpha Sorority, and the Jaycees.
- E. Technical assistance shall be provided to the Planning Commission and the general public by a planning consultant retained by the City. In addition, technical assistance is available from the City Manager's office. As Madras is the County Seat of Jefferson County, both the County Planner and the County Extension Agent have indicated a willingness to assist in the planning process and to provide assistance to interested citizens.

Finding: The proposed UGB land exchange was presented and discussed at public hearings of the Madras Planning Commission (1/3/2024), Madras City Council (2/13/2024), Jefferson County Planning Commission (2/8/2024), and Jefferson County Board of County Commissioners (2/28/2024). The City posted notices of the hearings in City Hall, Jefferson Co. Library, Jefferson Co. Annex, the Madras Post Office, and Madras Pioneer Newspaper on the dates identified in Table 1 below. Public testimony was taken at each hearing. This criterion is met.

Table 1. Public Meeting Notices

Hearing	Location	Date Posted	Notes
	City Hall	Dec. 6 th & 13 th , 2023	
	Jefferson Co. Library	Dec. 6 th & 13 th , 2023	
	Jefferson Co. Annex	Dec. 6 th & 13 th , 2023	
	Madras US Post Office	Dec. 6 th & 13 th , 2023	
	Madras Pioneer	Dec. 6 th & 13 th , 2023	
	Newspaper		

Commented [BG1]: Nick - Fill in?

<u>GOAL 2</u> - To establish a land use planning process and policy framework as a basis for all decisions and actions related to the use of the land and to insure an adequate factual base for such decisions and actions.

POLICIES -

A. The City and County shall insure that the Comprehensive Plan serves as a basis for future land use decision.

Finding: The proposed UGB land exchange documented in this report was developed with consideration of Madras' Comprehensive Plan Policies. This criterion is met.

B. The City and County shall be responsive to the changes in needs and conditions over time and amend the plan accordingly. The amendment process is discussed in the Land Use element.

Finding: The proposed UGB land exchange documented in this report is a needed amendment to the City's Comprehensive Plan, to allow for more efficient utilization of land and more achievable development of needed housing. This criterion is met.

C. The land use plan map and zoning maps for properties within in the Madras Urban Growth Boundary are the same. The City and County will work to adopt common zones for land in the UGB to provide certainty for property owners regarding the intended future urban use for all lands in the boundary.

Finding: The land proposed for inclusion in the UGB documented in this report will be zoned and comprehensively planned as R-3. This criterion is met.

GOAL 3 - To preserve and maintain agricultural lands.

POLICIES -

- A. To establish an Urban Growth Boundary to separate rural lands from urbanizable lands.
- B. Encourage establishment of exclusive farm use zoning outside the established Urban Growth Boundary.

Finding: The land proposed for inclusion in the UGB documented in this report will be zoned R-3, separating rural land from urbanizable land. The proposal decreases the perimeter of the UGB and thus more efficiently separates rural lands from urban/urbanizable lands.

GOAL 10 - To provide for the housing needs of the citizens of the City.

POLICIES - The City shall:

A. Provide buildable land for a variety of housing types. So that a reasonable housing balance can be provided and that a mix of housing types on a variety of lot sizes are available for both

existing and future area residents, the City shall encourage the development of a range of housing types including "middle housing." "Middle housing" is slightly denser than a detached single dwelling surrounded by a yard, but less dense than an apartment building. It can take several forms depending on the neighborhood or district context, including one to four dwelling units on a single lot—attached or detached—townhouses, cottage clusters, tiny homes, stacked flats, garden apartments, and boarding houses. It can occur in infill, redevelopment, conversions, and new subdivisions.

Finding: The proposed UGB land exchange will provide more achievable opportunities for development of a variety of housing types, as part of the Yarrow Master Plan area, including single-family housing (in a range of lot sizes), townhouses, and multifamily housing. This criterion is met.

B. Encourage development of suitable housing to satisfy all income levels. With the addition of more allowable housing types and the removal of barriers to middle housing, more development of attainable housing for low-, moderate- and middle-income residents will be permittable, and the City will grow into a more diverse, vibrant community.

Finding: The proposed UGB land exchange will provide more achievable opportunities for development of a variety of housing types, as part of the Yarrow Master Plan area, including single-family housing (in a range of lot sizes) and multifamily housing. The land being removed from the UGB was planned to be developed predominantly with larger lot single-family housing built around a golf course. The wider variety of housing sizes and types in subarea J will provide more variety in affordability of newly built housing. This criterion is met.

<u>GOAL 11</u> - To plan and develop a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban and rural development.

POLICIES - The City shall:

- A. Continue to support the school district in providing adequate educational facilities.
- B. Provide urban services as required to the urbanizing areas of the City.
- C. Ensure the provision of urban services--streets, water and sewer--as new developments occurs.
- D. The City shall continue coordinating the existing agreement between the City and Deschutes Valley Water District.
- E. The City shall coordinate with ODOT in implementing its improvement program.

Finding: The proposed UGB land exchange (subarea J) is the area that can be most efficiently serviced with City water and wastewater, as well as connecting with Madras roads, as

described in Section 4. The proposal does not detract from the City's coordination efforts with partner agencies.

GOAL 12 - To provide and encourage a safe, convenient, and economical transportation system.

POLICIES - The City shall maintain and improve the City's street network policies. The City shall undertake to resolve the following problems as noted in the inventories section of the Comprehensive Plan.

Finding: The proposed UGB inclusion lands (subarea J) is the area that can be most efficiently connected with Madras roads, as described in Section 4. The exchange lands are not associated with any of the identified transportation problems.

<u>GOAL 14</u> - To provide for an orderly and efficient transition from rural to urban land, and to provide for livable communities.

POLICIES -

- A. The City, in cooperation with Jefferson County, shall establish an Urban Growth Boundary.
- B. The City, in cooperation with Jefferson County, shall mutually agree to a management plan for the Urban Growth Boundary area.
- C. The City, in cooperation with Jefferson County, shall establish an Urban Growth Boundary revision process to be utilized in a proposed change of the Urban Growth Boundary.
- D. The City shall encourage the development of complete, livable communities that include characteristics such as: a variety of lot sizes, dwelling unit types and ownership types, open spaces and other recreational amenities, a mix of land uses, school and community facilities, connected streets, proximity to downtown and other employment centers, and development that is scaled to the pedestrian and creates a sense of place. New growth areas should be developed in accordance with the Master Planned Community Overlay zone, which requires generous open space and amenities, and encourages efficient use of land and public facilities and services, a variety of housing types, innovative designs and complete pedestrian-friendly communities. Physical barriers, such as highways, tend to disrupt complete communities and livability because they disconnect areas from downtown and result in an auto-oriented environment of sprawl along highway corridors.

Finding: The proposed changes to Madras UGB by bringing subarea J into the UGB and removing the land identified in this report from the UGB will be adopted by both Madras and Jefferson County. This criterion is met.

Finding: The proposed UGB land exchange will allow for development of subarea J as a part of the Yarrow Master Plan area. It will include a wider variety of housing than was planned

for the area being removed from help Madras' development as a	n the UGB, with nearby parks and a scl complete and livable community. This	nool. This change will s criterion is met.	
ECONorthwest	Madras UGB Lar(dเว็มสอต Fér©inogs 1291;1}	78	
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Consistency with Madras and Jefferson County Urban Reserve Area Report

The Urban Reserve Area Report was adopted by Madras DETAILS. The report includes the following Goal 14 policies that are relevant to the proposed land exchange:

E. The City, in cooperation with Jefferson County, shall give priority to land in designated urban reserve areas over other land when considering urban growth boundary amendments.

Finding: The area proposed to be brought into the UGB (subarea J) is within Madras' Urban Reserves. This criterion is met.

- F. The City shall favor UGB amendments that involve land in locations that are suitable to address identified urban land needs in order to minimize buildable land supply shortages and address identified needs. Factors that will be considered when evaluating UGB additions include:
 - Existing and planned capacity of the transportation system
 - Existing and planned capacity of the city waste water treatment plant
 - Existing and planned capacity of the city sanitary sewer conveyance system
 - Existing and planned capacity of the Deschutes Valley Water District supply system
 - Impacts on schools, parks, and public safety service providers
 - Impacts on future operating costs for public facilities and services

Finding: Impacts on the these systems were considered in the evaluation of land to bring into the UGB, as documented in Chapter 4, with additional considerations in Chapters 5 and 6. The best area for inclusion in the UGB was determined to be subarea J, as discussed in other sections of this report. The criterion is met.

H. During years when a comprehensive UGB demand and supply evaluation is not scheduled, individual applications for adding property to the UGB shall be limited to requests of less than 50 acres. UGB amendment applications must demonstrate consistency with applicable Oregon statutes and administrative rules and be accompanied by information that addresses Policy 14-J below. Applications that involve more than 25 acres also must comply with provisions of Policy 14-I.

Finding: The proposed UGB land swap is for fewer than 50 acres. Consistency with applicable Oregon Statutes and administrative rules is demonstrated throughout this document. This criterion is met.

Commented [BG2]: Nick - How and when was it adopted?

- I. The City, in cooperation with Jefferson County, shall encourage the development of complete, livable communities that include characteristics such as: a variety of lot sizes, dwelling unit types and ownership types, open spaces and other recreational amenities, a mix of land uses, school and community facilities, connected streets, proximity to downtown and other employment centers, and development that is scaled to the pedestrian and creates a sense of place. New growth areas added to the UGB should be planned and developed in accordance either with the city Master Planned Community Overlay zone, or an Area Master Plan.
 - 1. A Master Planned Community (MPC) Overlay may apply to large multi- phased development projects where the master plan is intended to guide future development patterns and serves to regulate the site-development approval process. MPC's require generous open space and amenities, and encourage efficient use of land and public facilities and services, a variety of housing types, innovative designs and complete pedestrian-friendly communities. Physical barriers, such as highways, tend to disrupt complete communities and livability because they disconnect areas from downtown and result in an auto-oriented environment of sprawl along highway corridors.
 - 2. An Area Master Plan (AMP) is appropriate for land added to the UGB where the approval of urban development is expected to rely on conventional urban zoning and a conventional development application and review process. An AMP must be prepared for all contiguous properties added to the UGB that are greater than 25 acres and which are not subject to a MPC overlay. An AMP shall encourage efficient use of land, zoning consistent with an identified urban land need, appropriate locations for transportation improvements, public facilities, protection for significant open space, scenic, historic, and natural resource areas. An AMP must show how planned land uses will be integrated with the existing urban development pattern.

Finding: The area proposed for inclusion in the UGB (subarea J) will need to be included in an update of the Yarrow Master Plan, consistent with Madras' development code, before subarea J is developed.

- J. All land use applications or legislative proposals to expand the Madras UGB must be accompanied by information that documents the following:
 - 1. The proposed urban zoning or land use program for the subject properties;
 - 2. An annexation program for subject properties;
 - 3. Evidence that all public facilities required by OAR 660-011-000 can be provided either through planned system improvements outlined in adopted facility master plans or by supplemental improvements that augment adopted infrastructure plans;
 - 4. Evidence that the proposed zoning or land use plan complies with requirements of OAR 660-0012-0060 either by demonstrating that the planned improvements in the Madras

Commented [BG3]: Nick - Do you have anything to add here about when this update is expected and may be adopted.

Transportation System Plan (TSP) have capacity to meet transportation needs of the proposed zoning or land use plan or that supplemental transportation improvements, which augment the adopted TSP, will meet this need;

- 5. Evidence that providers of other public facilities including schools, parks and recreation, energy, health care, etc. are able to meet the projected demand for their services;
- Evidence that development on property constrained by or affected by natural hazards are protecting from such hazards;
- 7. Evidence that known or probable significant resources related to open space, scenic areas, historic places or structures, or fish and wildlife habitat with appropriate measures for protecting significant sites.
- 8. Evidence that a majority of property owners support the conversion of land to urban uses and that land use regulations and financing for development related public improvements are available that ensure the land can be developed as planned within a 20-year horizon.

Finding: The land proposed to be included in the UGB will be simultaneously annexed into the City and assigned R-3 zoning and comprehensive plan designations. Criteria 1 and 2 are met

Finding: Subarea J provides opportunities to connect to a water main near the subarea on Yarrow Avenue and will require minimal extension of sewer service from the Yarrow Avenue and Bean Drive intersection. Extension of these services in this area will be less costly and burdensome than other alternative area considered for the land exchange. Existing fire and police protection will be extended by the City to serve the area. Criterion 3 has been met.

Finding: The transportation analysis presented in Chapter 6 for Goal 12 concludes that the proposed land exchange does not constitute a significant effect, as defined by the TPR, if the lands were developed to their maximum reasonable level under the R-3 zoning. Criterion 4 has been met.

Finding: The City's existing public facility master plans contemplated serving the 39 acres of buildable land proposed to be removed from the UGB. The 40 acres of buildable land to be included represents a nominal increase in potential development and does not exceed capacities to provide urban services to the included lands as documented in submitted will serve letters. Criterion 5 has been met.

Finding: Subarea J is less sloped and otherwise has no other substantial natural hazards, as documented in Chapters 2 and 3 of this analysis. Criterion 6 has been met.

Finding: There are no known or probable significant resources in subarea J. Criterion 7 has been met.

Commented [BG4]: Nick - Is this enough?

Commented [GC5]: Need these per criterion (5) above.

Commented [BG6R5]: Nick?

Finding: The land owners of subarea J and the area proposed for removal from the UGB are City of Madras in both cases. Criterion 8 has been met.

Madras Development Code

18.75.030 Quasi-judicial amendments.

(1) Applicability, Procedure and Authority. Quasi-judicial amendments generally refer to a plan amendment or zone change affecting a single or limited group of properties and that involves the application of existing policy to a specific factual setting. Quasi-judicial amendments shall follow the Type III procedure using the standards of approval in subsection (2) and/or (3) of this section, as applicable. Based on the applicant's ability to satisfy the approval criteria, the application may be approved, approved with conditions, or denied.

Finding: The proposal applies to specific parcels of land and is thus subject to the quasijudicial procedures set out in this section. It is thus subject to quasi-judicial procedures.

- (2) Criteria for Quasi-Judicial Comprehensive Plan Map Amendments. The applicant shall submit a written narrative which explains how the approval criteria will be met. A recommendation or a decision to approve, approve with conditions, or to deny an application for a quasi-judicial amendment shall be based on all of the following criteria:
 - (a) Approval of the request is consistent with the relevant Statewide Planning Goals that are designated by the Community Development Director;
 - (b) Approval of the request is consistent with the relevant policies of the Comprehensive Plan that are designated by the Community Development Director;
 - (c) The property and affected area are presently provided with adequate public facilities, services, and transportation networks to support the use, or such facilities, services and transportation networks are planned to be provided concurrently with the development of the property;
 - (d) Evidence of change in the neighborhood or community or a mistake or inconsistency in the Comprehensive Plan or Zoning Map regarding the property that is the subject of the application; and
 - (e) Approval of the request is consistent with the provisions of the Transportation Planning Rule.

Finding: The relevant statewide planning goals are addressed below. The policies of the Madras Comprehensive Plan were addressed above. The proposal includes modifications to the City's public facilities master plans for the planned provisions of urban services to the lands added to the UGB (and exclusion of the withdrawn lands from such plans). The Transportation Planning Rule is addressed below.

- (3) Criteria for Quasi-Judicial Zone Changes. The applicant must submit a written narrative which explains how the approval criteria will be met. A recommendation or a decision to approve, approve with conditions, or to deny an application for a quasi-judicial zone change must be based on meeting the following criteria:
 - (a) The amendment will bring the Zoning Map into conformance with the Comprehensive Plan map;
 - (b) The property and affected area is presently provided with adequate public facilities, services, and transportation networks to support the use, or such facilities, services and transportation networks are planned to be provided concurrently with the development of the property; and
 - (c) Approval of the request is consistent with the provisions of the Transportation Planning Rule.

Finding: The proposal includes a concurrent redesignation and rezoning of the added lands to R-3, which will achieve conformance in planning and zoning. The proposal does not include modifications to the City's public facilities master plans for the planned provisions of urban services to the lands added to the UGB (and exclusion of the withdrawn lands from such plans). Before development occurs, the applicant will be required to submit a master plan to address need for public facility changes. The Transportation Planning Rule is addressed below.

Madras Urban Reserve Area Management Agreement

The City of Madras and Jefferson County entered into the *Madras Urban Reserve Area Management Agreement'* (URAMA) with the purpose of establishing standards and procedures for land use actions on land in the Madras Urban Reserve Area.

OAR 660-021-0040(2)(e) and the URAMA state that:

The County shall prohibit certain uses in the URA, including plan or zoning map amendments that allow a minimum lot size less than ten acres as outlined in JCZO Section 323.3.

Finding: The land removed from the UGB will be down zoned to Rangeland, consistent with the zoning on subarea J and other adjacent land in the Urban Reserves. Jefferson County's minimum lot size in the RL zone is 160 acres (Jefferson County Zoning Ordinance 301.8). This requirement is met.

OAR 660-021-0050(1) and the URAMA state that:

Jefferson County shall have authority and jurisdictional responsibility for current planning activities, land use decisions, building permitting, and code enforcement within the URA.

¹ The Madras Urban Reserve Area Management Agreement was adopted by the City of Madras and Jefferson County on 1/28/2009.

Upon inclusion of property from the URA within the Urban Growth Boundary, the property shall be subject to the Urban Growth Management Area Agreement

Finding: The land removed from the UGB will be zoned to Rangeland by Jefferson County and the area brought into the UGB (subarea J) will be concurrently annexed and zoned R-3 by the City of Madras and managed like other R-3 land within the City limits. This requirement is met.

The URAMA states that:

Designation of service responsibility, as required by OAR 660-021-0050(2) is as follows:

Service	Existing Service Provider	Future Urban Service Provider
Sanitary Trash Disposal	No Public Service Provider	No Public Service Provider
Sanitary Sewer	No Public Service Provider	City of Madras
Water	Deschutes Valley Water District	Deschutes Valley Water District
Fire Protection	Jefferson County Fire District #1	Jefferson County Fire District #1
Parks	Jefferson County	City of Madras
Recreation	Madras Aquatic Center District	Madras Aquatic Center District
Transportation	Jefferson County	City of Madras
Storm Water	Jefferson County	City of Madras

Finding: The proposal does not change the service providers applicable to lands within the urban reserve areas as set forth above.

6. Statewide Goal Consistency Analysis

This section addresses compliance with applicable Statewide Planning Goals.

Goal 1 Citizen Involvement

Goal 1 calls for the opportunity for citizens to be involved in all phases of the planning process. The public was provided the opportunity to be involved in the decision-making process regarding changes to the UGB through public meetings (in-person and by video conference), Madras Planning Commission, Madras City Council, Jefferson County Planning Commission, and Jefferson County Board of County Commissioners. Public testimony was taken at each hearing. The City of Madras notifies nearby property owners, publishes a public hearing notice and contact information in the newspaper, and facilitates public participation during public hearings.

The public has had the opportunity to be involved in decision making for issues related to the UGB land exchange analysis.

Goal 2 Land Use Planning

Goal 2 outlines the basic procedures of Oregon's statewide planning program, stating that land use decisions must be made in accordance with comprehensive plans and that effective implementation ordinances must be adopted.

Madras' acknowledged Comprehensive Plan and implementing ordinances provide a State-approved process for land use decision making, and a policy framework derived from a proper factual base. The City's Comprehensive Plan and implementing ordinances provide the local criteria by which the applicant's request will be reviewed. The proposed UGB land exchange area (subarea J) will require review and compliance with the applicable statewide planning goals. No exception to statewide planning goals is necessary.

Goal 2 also requires the consideration of alternatives. The City considered a range of alternatives for the UGB land exchanged, as documented in Sections 3 and 4 of this report. All pertinent documentation has been made available to all interested parties. Goal 2 has been properly addressed.

Goals 3 Agricultural Lands and 4 Forest Lands

As stated in 660-024-0020(1)(b), Goals 3 and 4 are not applicable when establishing or amending an urban growth boundary. No further analysis is required.

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

Goal 5 requires local governments to inventory and protect natural resources. There are no inventoried significant Goal 5 resources subarea J. No further analysis is required.

Goal 6 Air, Water and Land Resources Quality

Goal 6 requires local comprehensive plans and implementing measures to be consistent with state and federal regulations. The proposed UGB exchange will have little, if any effect on the quality of air, water and land resources of the area. By complying with applicable air, water and land resource quality policies in the Madras Comprehensive Plan, Goal 6 will be properly addressed.

Goal 7 Areas Subject to Natural Disasters and Hazards

Goal 7 requires that jurisdictions apply appropriate safeguards when planning development in areas that are subject to natural hazards such as flood hazards.

The identified natural hazards in Madras are flooding and landslide hazards. The proposed UGB exchange area (subarea J) does not have flood hazards or significant landslide hazards. The alternatives analysis considered lands within the FEMA flood hazards and areas with steep sloped, attempting to avoid expanding into areas with identified hazards. Lands included within subarea J are not subject to any known natural hazards.. Thus, Goal 7 has been properly addressed.

Goal 8 Recreation Needs

Goal 8 requires governmental organizations with responsibility for providing recreational facilities to plan for recreational facilities. The Yarrow Master Plan includes three new public parks and the existing Juniper Hills County Park is to the north of the Master Plan area. Subarea J does not itself include areas planned for parks.

Madras adopted the *Madras Parks Master Plan* in 2019. That plan inventoried existing facilities, estimates a level of service, and identified park needs. The Master Plan identified existing park improvements and new park improvements. Neither areas involved in the exchange include park land.

The land exchange proposed is for exchange of about 40 acres of land, with the area removed from the UGB and added to the UGB both zoned R-3. As a result, the proposed exchange will not significantly change Madras housing capacity or demand for new park land. Thus, Goal 8 has been properly addressed.

Goal 9 Economy of the State

Goal 9 requires jurisdictions to plan for an adequate supply of land for employment uses to further goals for economic development. There are no commercial or industrial zoned lands involved in the proposed UGB exchange. As a result, Goal 9 is not applicable.

Goal 10 Housing

The proposed UGB land exchange results in a slight increase in buildable acreage under the same R-3 zoning. Accordingly, the land exchange will result in substantially the same number of housing units. Subarea J will provide better opportunities to develop a wider range of housing types than the land being removed from the UGB. As a result, there will be little impact on the residential land supply and better opportunity to achieve the housing objectives set out in Goal 10. Goal 10 has been properly addressed.

Goal 11 Public Facilities and Services

The provision of public facilities and services was considered in the Goal 14 alternatives analysis process described above and the application is supported by will-serve letters from such providers. Subarea J provides opportunities to connect to a water main near the subarea on Yarrow Avenue and will require minimal extension of sewer service from the Yarrow Avenue and Bean Drive intersection. Extension of these services in this area will be less costly and burdensome than other alternative areas considered for the land exchange..

For the above reasons, the City finds that Goal 11 has been satisfied.

Goal 12 Transportation

Goal 12 encourages the provision of a safe, convenient and economic transportation system. This goal also implements provisions of other statewide planning goals related to transportation planning in order to plan and develop transportation facilities and services in coordination with urban and rural development (OAR 660-012-0000(1)). For the purposes of the proposed amendments, the Transportation Planning Rule (TPR) requires additional analysis if the proposed amendments would significantly affect an existing or planned transportation facility, as defined in OAR 660-001-0060(1).

The following TPR analysis by Kittleson & Associates demonstrates compliance with Goal 12 , the TPR and the provisions of City and County land use regulations that implement Goal 12 and the TPR.



September 21, 2023 Project# 28585

To: Nick Snead, City of Madras
Beth Goodman, ECONorthwest

From: Matt Kittelson & Julia Kuhn

RE: Madras Urban Growth Boundary Land Exchange

The proposed land exchange requires preparation of Transportation Planning Rule (TPR) analyses per Oregon Administrative Rule (OAR) 066-012-060. As summarized herein, the proposed land exchange does not constitute a significant effect, as defined by the TPR, if the lands were developed to their maximum reasonable level under the R-3 zoning. The remainder of this memorandum provides the details supporting this conclusion.

Transportation Planning Rule (TPR) Evaluation

Two sections of the TPR apply to amendments to acknowledged land use designations. Per OAR 660-012-0060(1) and (2), the first step in assessing an amendment's potential transportation impact is to compare the vehicular trip generation assuming a "reasonable worst-case" development scenario under the existing and proposed amendment. If the trip generation potential increases by more than 400 daily trips under the proposed amendment, additional analysis is required to assess whether the proposal will "significantly affect" the transportation system. Conversely, if the trip generation under the amendment is less than the thresholds defining a "significant effect," no additional quantitative analysis is necessary to support the change.

Trip Generation Comparison

To test for a significant effect, we reviewed the change in trip generation potential of the lands to be replaced versus that of the lands to be added. As noted above, the lands within the UGB today identified for removal are zoned R-3 and the lands identified to be brought into the UGB are planned for R-3 zoning. The net increase of the land exchange is one buildable acre. Per the City's Municipal Code Section 18.15.040 and analyses conducted on behalf of the City by ECONorthwest, the following represents the "reasonable worst-case" scenarios in terms of trip making under R-3:

- Single family homes developed at a density of 5.2 units per acre;
- Townhomes developed at a density of 15 units per acre;
- Duplexes, triplexes, and quadplexes developed at a density of 13.8 units per acre; and/or,
- Apartments developed at a density of 16.8 units per acre.

Table 1 presents a trip generation comparison for the net increase of one buildable acre associated with the lands to be added versus those to be removed. This comparison is based on information contained in the *Trip Generation Manual* (11th Edition, as published by the Institute of Transportation Engineers). As shown in the table, the maximum trip generation change associated with the proposed land exchange is associated with the potential development of 17 apartments. These apartments could result in a daily trip increase of 115 vehicular trips, of which 9 trips would occur during the weekday PM peak hour.

Table 1. Trip Generation Comparison Associated with One Additional Acre of R-3 Lands

Land Use	ITE Code	Size (units)	Total Daily Trips	Weekday PM Peak Hour Trips	Maximum for Analyses?
Single Family Detached	215	5	47	5	No
Townhomes	215	15	108	9	No
Duplex/Triplex/Quadplex	215	14	101	8	No
Apartments	220	17	115	9	Yes
Highest Trip Generat	115	9	Apartments		

In reviewing Table 1, Policy 1F.5 of the Oregon Highway Plan establishes the following thresholds for determining significance:

- Any proposed amendment that does not increase the average daily trips by more than 400 is not considered significant.
- Any proposed amendment that increases the average daily trips by more than 400 but less than 1,000 for state facilities is not considered significant where:
 - \circ The annual average daily traffic is less than 5,000 for a two-lane highway
 - o The annual average daily traffic is less than 15,000 for a three-lane highway
 - o $\,$ The annual average daily traffic is less than 10,000 for a four-lane highway
 - o The annual average daily traffic is less than 25,000 for a five-lane highway
- If the increase in traffic between the existing plan and the proposed amendment is more than 1,000 average daily trips, then it is not considered a small increase in traffic and the amendment causes further degradation of the facility and would be subject to existing processes for resolution.

As shown, the proposed land exchange would not result in a significant impact per OHP Policy 1F.5 as it would constitute an increase of less than 400 daily trips (i.e., only an increase of 115 daily trips). We further note that neither the increase of 115 daily trips nor increase of 9 weekday PM peak hour trips meet the City's Traffic Impact Study guidelines for necessitating a

study. Per Madras Municipal Code Section 18.25.180, a Transportation Impact Analysis is required if the land use action results in an increase of 500 or more daily trips or 50 or more PM peak hour trips. For these reasons, no quantitative analyses are needed to address the TPR nor the City's requirements.

Summary of Applicable Oregon Administrative Rule Criteria

OAR Section 660-12-0060 of the TPR sets forth the relative criteria for evaluating plan and land use regulation amendments. Table 2 summarizes the criteria in Section 660-012-0060 and the applicability to the proposed land exchange.

Table 2. Summary of Criteria in OAR 660-012-0060

Section	Criteria	Applicable?
1	Describes how to determine if a proposed land use action results in a significant effect.	Yes
2	Describes measures for complying with Criteria #1 where a significant effect is determined.	No
3	Describes measures for complying with Criteria #1 and #2 without assuring that the allowed land uses are consistent with the function, capacity and performance standards of the facility.	No
4	Determinations under Criteria #1, #2, and #3 are coordinated with other local agencies.	Yes
5	Indicates that the presence of a transportation facility shall not be the basis for an exception to allow development on rural lands.	No
6	Indicates that local agencies should credit developments that provide a reduction in trips.	No
7	Outlines requirements for a local street plan, access management plan, or future street plan.	No
8	Defines a mixed-use, pedestrian-friendly neighborhood.	No
9	A significant effect may not occur if the rezone is identified on the City's Comprehensive Plan and assumed in the adopted Transportation System Plan.	No
10	Agencies may consider measures other than vehicular capacity if within an identified multimodal mixed-use area (MMA).	No
11	Allows agencies to override the finding of a significant effect if the application meets the balancing test.	No

As shown in Table 2, there are eleven criteria that apply to Plan and Land Use Regulation Amendments. Of these, two are applicable to the proposed land exchange. These criteria are provided below in italics with our response shown in standard font.

OAR 660-12-0060(1) If an amendment to a functional plan, an acknowledged comprehensive plan, or a land use regulation (including a zoning map) would significantly affect an existing or planned transportation facility, then the local government must put in place measures as provided in section (2) of this rule, unless the amendment is allowed under section (3), (9) or (10) of this rule. A plan or land use regulation amendment significantly affects a transportation facility if it would:

- (a) Change the functional classification of an existing or planned transportation facility (exclusive of correction of map errors in an adopted plan);
- (b) Change standards implementing a functional classification system; or
- (c) Result in any of the effects listed in paragraphs (A) through (C) of this subsection based on projected conditions measured at the end of the planning period identified in the adopted TSP. As part of evaluating projected conditions, the amount of traffic projected to be generated within the area of the amendment may be reduced if the amendment includes an enforceable, ongoing requirement that would demonstrably limit traffic generation, including, but not limited to, transportation demand management. This reduction may diminish or completely eliminate the significant effect of the amendment.
 - (A) Types or levels of travel or access that are inconsistent with the functional classification of an existing or planned transportation facility;
 - (B) Degrade the performance of an existing or planned transportation facility such that it would not meet the performance standards identified in the TSP or comprehensive plan; or
 - (C) Degrade the performance of an existing or planned transportation facility that is otherwise projected to not meet the performance standards identified in the TSP or comprehensive plan.

Response: The proposed land exchange is not anticipated to result in an increase in daily trip making that constitutes a significant effect per OHP Policy 1F.5 nor does the daily or PM peak hour trip generation potential result in an increase that would warrant a Traffic Impact Analysis per the City's Municipal Code requirements. Further, no changes to the City's functional street classification designations or standards are proposed or warranted by the land swap and the adjacent facilities are appropriate for the R-3 designations. We also note that the City's Transportation System Plan identifies the future extension of Bean Drive to this area, which will benefit the connectivity provided to the Yarrow Master Plan lands.

(4) Determinations under sections (1)–(3) of this rule shall be coordinated with affected transportation facility and service providers and other affected local governments.

Response: The Applicant is coordinating the proposed zone change with Jefferson County and ODOT.

Conclusions

As discussed herein, our review concluded that the proposed land exchange and resulting increase of one buildable acre into the City's Urban Growth Boundary that is zoned R-3 does not constitute a significant effect as defined by the TPR and OHP Policy 1F.5. Further, neither the small increase in daily nor weekday PM peak hour trips associated with the land exchange require a Transportation Impact Analysis per the City's requirements.

Goal 13 Energy

Goal 13 requires land and uses developed on the land to be managed and controlled so as to maximize the conservation of all forms of energy, based upon sound economic principles. Energy consequences of the proposed urban growth area amendment have been considered in the Goal 14 alternatives analysis process. Therefore, Goal 13 has been adequately addressed.

Goal 14 Urbanization

Goal 14 has been complied with as demonstrated in Chapters 2 through 4 of this report.

Goal 15 through 19

Goals 15 through 19 are related to the Willamette Greenway and coastal resources. As such, these goals do not apply to the subject sites and no further analysis is required.

CITY OF MADRAS Request for Planning Commission Action

Date Submitted: December 26, 2023

Agenda Date Requested: January 3, 2024

To: Madras Planning Commission

From: Nicholas Snead, Community Development Director

File: AX-23-2

Subject: City of Madras Request for Annexation (Boundary Change).

TYPE OF ACTION REQUESTED: (Check One)

⊠ Formal Action/Motion

■ No Action - Report & Discussion Only

MOTION FOR PLANNING COMMISSION ACTION:

I move that the Planning Commission make a recommendation to the City Council to approve the proposed Annexation based on the findings provided.

OVERVIEW:

Amend the Madras city limits (annexation) by removing 40 acres +/- from the city limits and replacing an equivalent amount of land to the Madras city limits. The land being removed and added to the city limits is owned by City of Madras and is part of the Yarrow Master Plan area. The area being removed from the city limits is zoned R-3 (City Zoning) and the area being added to the city limits will be zoned R-3 as identified in Exhibit B and Figures 1 and 2.

ANALYSIS:

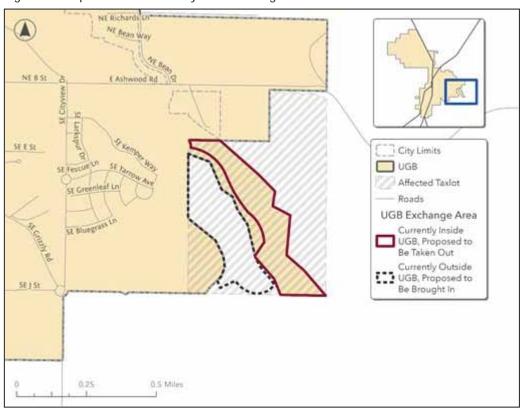
The City of Madras is the applicant and to document the City's authorization to initiate the annexation, the City Council passed Resolution No. 24-2023. The proposed Annexation is a legislative and the applicant (City of Madras) has provided information demonstrating compliance with the applicable State and City approval criteria for a boundary change (Annexation) by property owner consent. The proposed boundary change will remove 40 acres +/-. The City has provided the required notices as specified below in Table 1.

Page -1- Request for Planning Commission Action

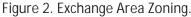
Table 1. Public Notices Issued.

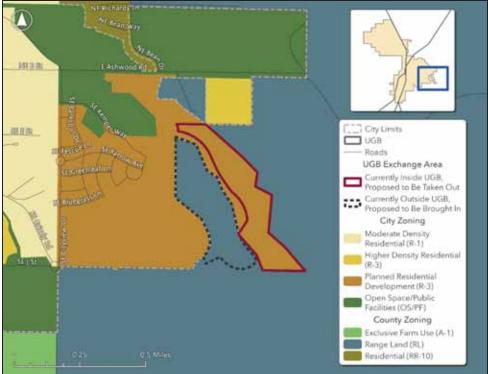
	Date Issued	
Notice Type	or Published	Notes
Adjacent Property Owner Notice	12-11-23	For 1-3-24 Planning Commission
		Hearing & 2-13-24 City Council Hearing
Development Team/Agencies Notice	12-15-23	For 1-3-24 Planning Commission
		Hearing & 2-13-24 City Council Hearing
Madras Pioneer Newspaper Public Hearing	12-20-23	For 1-3-24 Planning Commission
Notice	12-27-23	Hearing & 2-13-24 City Council Hearing
	1-10-24	
	1-17-24	

Figure 1. Proposed UGB and City Limits Changes



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The proposed boundary change (Annexation) has been determined to comply with the ORS Chapter 222, the City's Comprehensive Plan, and the City's Development Code (MMC 18.70 – Annexation). The proposed boundary change is being proposed to bring land closer to the existing UGB and city limits so that the territory can be developed at a lower cost due to more efficient infrastructure extensions. The Public Works Director has determined that the City's infrastructure has capacity to serve the land in the proposed boundary change. However, that at the time do development, the developer will solely be responsible for the cost to extend the infrastructure in accordance with the City's applicable infrastructure Plans (i.e. TSP, Wastewater Master Plan, etc.) and Public Improvement Design and Construction Standards. To clearly establish this standard, the Community Development Director requested guidance from the City Attorney on the need for an Annexation Agreement. The City Attorney reported that because the City owns the land, an Annexation Agreement with itself is not needed. Rather, the responsibility to pay for needed infrastructure extensions to serve future development is to be established when the ownership of the land changed. It is under these circumstances, that staff has made the findings of compliance with MMC 18.70.040(5) which states:

- (5) The annexation is timely and the petitioner has adequately addressed infrastructure supply and demand issues. This criterion is satisfied where:
 - (a) An adequate level of the urban services, including, without limitation, water, sewer, transportation, parks, and police services, and infrastructure supporting those urban services, is presently provided in the annexation area:

Page -3- Request for Planning Commission Action

- (b) The City and other service providers are readily capable of extending or upgrading urban services and infrastructure to the area proposed for annexation without undue cost, negatively impacting existing systems, or inhibiting the adequacy of urban services to existing areas within the City limits; or
- (c) Where urban services and infrastructure cannot readily be extended or upgraded, that the fiscal impacts to the City and other service providers of extending or upgrading urban services and supporting infrastructure have been mitigated through an annexation agreement or other mechanism approved by the City Council.

OPTIONS FOR PLANNING COMMISSION ACTION:

At the January 3, 2024 Planning Commission meeting, a public hearing will be convened, public comments will be accepted, and the Planning Commission may take formal action on the proposal. The Planning Commission may take formal action by either:

- 1. Approve with conditions the Annexation proposal;
- 2. Continue the Public Hearing to a date, time, and location
- 3. Denying the Annexation proposal and stating the factual justifications accordingly.

Supporting Documentation

Attachment A: Findings and Decision.

MOTION FOR PLANNING COMMISSION ACTION:

I move that the Planning Commission make a recommendation to the City Council to approve the proposed Annexation based on the findings provided.

CITY OF MADRAS COMMUNITY DEVELOPMENT DEPARTMENT 125 SW E Street Madras, OR, 97741 541-475-2344

FINDINGS AND DECISION

File	AX-23-3			
Applicants	Name & Address	Property Owned by Applicant (Map & Taxlot)		
	City of Madras	11-14-7-100		
	125 SW E Street			
	Madras, OR, 99741			
Subject Property	11-14-7-100			
Location	Subject property located directly east of the eastern terminus of Yarrow Avenue.			
Zoning	Existing land in city limits: Planned Residential (R-3). Land outside city limits: County			
	Range Land (RL)			
Proposal	Remove approximately 39 acres of land zoned R-3 and replace it with approximately 40			
	buildable acres of land that the City will zone R-3.			
Review Type	Type IV			
Public Hearing Dates	Hearings Body	Date		
	Planning Commission	January 3, 2024		
	City Council	February 13, 2024		
Staff Reviewer	Nicholas Snead, Community Development Director			
	nsnead@cityofmadras.us			
	541-475-2344			

I. APPLICABLE CRITERIA:

The following Oregon Statewide Planning Goals, Statutes, Rules, Plans and Ordinances may be applicable to the proposal:

State of Oregon:

- ORS 222.111
- ORS 222.120
- ORS 222.125
- ORS 197.175
- OAR 660-012-0060
- OAR 660-014-0060

City of Madras Comprehensive Plan:

• Policy 5

Madras Development Code, Chapter 18 – Development Code:

- Chapter 18.70 Annexation
- Chapter 18.80 Administration

II. EXHIBITS:

The exhibits listed in Table 1 below are included herein by reference to these findings and decision.

Table 1. Exhibits to Findings for file AX-23-3.

Exhibit	Description		
Exhibit A	City of Madras Resolution No. 24-2023, Authorizing initiation of annexation of City		
	property including legal descriptions.		
Exhibit B	City of Madras Public Works Director Memorandum dated December 15, 2023		
Exhibit C	Adjacent Property Owner Notice, December 11, 2023		
Exhibit D	Madras Pioneer Public Hearing Notice, December 20, 2023, December 27, 2023, January		
	10, 2024, and January 17, 2024.		
Exhibit E	Development Team notice, December 15, 2023.		
Exhibit F	Madras UGB Land Exchange Justification and Findings		

III. FINDINGS OF FACT:

1. LOCATION:

The proposed amendment to the Madras city limits is identified in the legal description contained in **Exhibit A**. Figure 1 below identifies the land that is in the Madras UGB and city limits that will be removed from both boundaries and the territory that is proposed to be added to both boundaries. The subject property is identified as Tax Lot 100 on Jefferson County Assessor's Map No. 11-14-7. There are no structures on the property and therefore the subject property no address is assigned to the property.

Figure 1. Proposed UGB and City Limits Changes.

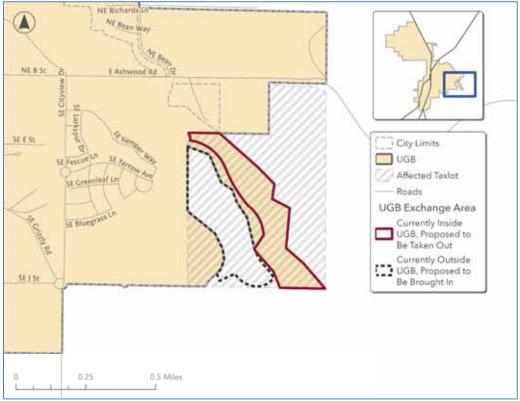




Figure 2. Exchange Area Zoning.

ZONING:

As shown on Figure 2 above, the portion of the subject property that is currently located in the UGB and city limits is zoned Planned Residential (R-3) on the City of Madras Urban Area Comprehensive Plan and Zoning Map. The portion of the subject property that is currently located outside of the UGB and city limits is zoned Range Land (RL) on the Jefferson County Zoning Map.

3. SITE DESCRIPTION:

The territory that is proposed to be annexed into the city limits is comprised of 40 acres +/- contiguous to the existing city limits. The territory that is currently in the city limits and the territory proposed to be annexed into the city limits is undeveloped. There was a residential structure at 316 NW 4th Street, but this has been removed. The other parcels have no known previous development.

4. SURROUNDING USES:

The uses surrounding the subject property are summarized in Table 1 below.

Table 1. Adjacent Property Zoning and Development Status

	1 3 0 1	
Direction from	Existing Zoning	Existing Use/Development
Subject Property		
North	Range Land (RL) (County)	Single-family detached dwelling
	Open Space/Public Facilities (OS/PF) (City)	and undeveloped Open
		Space/Public Facilities land.

South	Range Land (RL) (County)	Undeveloped Range Land.	
East	Range Land (RL) (County)	Undeveloped Range Land.	
West	Range Land (RL) (County)	Undeveloped Range land and	
	Planned Residential (R-3) (City)	Planned Residential land.	

5. PUBLIC NOTICES

Table 2. Public Notices Issued.

	Date Issued	
	or	
Notice Type	Published	Notes
Adjacent Property Owner Notice	12-11-23	For 1-3-24 Planning Commission Hearing &
		2-13-24 City Council Hearing
Development Team/Agencies Notice	12-15-23	For 1-3-24 Planning Commission Hearing &
		2-13-24 City Council Hearing
Madras Pioneer Newspaper Public Hearing	12-20-23	For 1-3-24 Planning Commission Hearing &
Notice	12-27-23	2-13-24 City Council Hearing
	1-10-24	
	1-17-24	

6. PUBLIC FACILITIES AND SERVICES:

If annexed, the subject property will be serviced by the following utilities and public facilities.

- **Electricity** Pacific Power
- Road access The subject property will be accessed by Yarrow Avenue (existing).
- **Telecommunications** CenturyLink and BendTel
- Domestic Water Deschutes Valley Water District
- Wastewater/Sewer City of Madras
- Fire protection Jefferson County Fire District No. 1
- Police protection City of Madras
- Schools -- Jefferson County 509J School District

7. PROPOSAL:

Amend the Madras city limits (annexation) by removing 40 acres +/- from the city limits and replacing an equivalent amount of land to the Madras city limits. The land being removed and added to the city limits is owned by City of Madras and is part of the Yarrow Master Plan area. The area being removed from the city limits is zoned R-3 (City Zoning) and the area being added to the city limits will be zoned R-3 as identified in Exhibit A and Figures 1 and 2.

IV. <u>FINDINGS</u>:

MADRAS DEVELOPMENT CODE

Chapter 18.70: Annexation

...

SECTION 18.70.020 ANNEXATION PROCEDURE.

City of Madras City Limits Swap File No. AX-23-3 Page 4 of 24 Annexation is a legislative land use decision and is subject to applicable provisions of the City of Madras Comprehensive Plan, Oregon Revised Statutes, and Oregon Administrative Rules. An annexation petition may be initiated by any person or by the City Council by resolution. Except as otherwise provided in MDC 18.70.050 through 18.70.080 or by state law, annexation petitions shall follow the procedures set out below:

FINDING: The requested annexation (boundary change) has been processed in accordance with the Type IV procedures for legislative land use decisions. The identified provisions will be reviewed for consistency and the findings of compliance are stated herein this land use decision.

1. Any person who wishes to petition for the annexation of territory to the City shall participate in a pre-application conference prior to filing a petition for annexation. The purpose of the pre-application conference shall be to inform the person of the process for annexing territory into the City and to discuss the annexation proposal.

FINDING: The City is initiating the annexation and therefore a pre-application meeting is not required. Notice to adjacent property owners and agencies has been provided as identified on page 5 under "Public Notices".

2. Petitioners shall submit a completed petition on the form prescribed by the City, along with the applicable fee, to the City of Madras Community Development Department.

FINDING: The submitted petition for annexation was provided in the form of Resolution No 24-2023.

3. If the submitted petition for annexation is complete, the Community Development Director shall schedule a Public Hearing before the City's Planning Commission, followed by a Public Hearing before the City Council for a decision on the proposed annexation. Notice will be provided and comments solicited from affected City Departments, state agencies, and special districts.

FINDING: Staff finds the annexation proposal is complete by inclusion of the exhibits of this land use decision. The City has schedule public hearings before the Planning Commission and City Council as identified in Table 3 below. Furthermore, the Community Development Department has issued notice to the City departments, affected state agencies, and special districts on December 15, 2023.

Table 3. Public Hearing Dates by Hearings Body

Hearings Body	Date	Action
Planning Commission	January 3, 2024	To be determined
City Council	February 13, 2024	To be determined

4. The Community Development Director, or a designee, shall prepare a report summarizing solicited comments and indicating the degree to which the petition is consistent with the provisions of this Code and other applicable criteria including, but not limited to, compliance with existing approvals and agreements.

FINDING: This land use decision and the related staff reports to the Planning Commission and City City Council satisfy the above stated standard.

5. The Planning Commission shall conduct a public hearing to determine a recommendation to the City Council to approve, approve with conditions or modifications, or disapprove the feasibility of the

annexation proposal based on the applicable criteria as set forth in MDC 18.70.040. The Planning Commission shall state its recommendation, along with supporting rationale, in writing.

FINDING: Public hearings were held and noticed before the Planning Commission the City Council as identified in Table 2 and 3. At the January 3, 2024 the Planning Commission took formal action _____.

At the February 13, 2023 City Council meeting, the Council took formal action to _____.

6. The City Council, by ordinance, may approve the annexation following a public hearing and after making findings that the criteria set out in MDC 18.70.040 below have been met.

FINDING: Public hearings were scheduled as shown in Table 3 above before the City Council. If the Council finds that the proposed annexation meets the applicable criteria, the Council will adopt an ordinance with appropriate findings to effectuate the annexation.

7. All public hearings for an annexation petition shall be noticed in accordance with ORS Chapter 222. Additionally, where an annexation, if approved, would create an island of unincorporated property, those property owners of record within the potential island shall be notified. Such notification shall expressly alert the owners of the potential for formation of an island.

FINDING: Notices of the January 3, 2024 Planning Commission and February 13, 2024 City Council public hearings were published in the Madras Pioneer December 20, 2023, December 27, 2023, January 10, 2024, and January 17, 2024. The proposed annexation (boundary change) will not result in an island annexation.

8. Where a vote on a proposed annexation is required, the City shall submit the question to the Jefferson County Clerk. If, following the vote, the City Council finds that a majority of the eligible votes cast are in favor of the annexation, the City Council shall, by ordinance, proclaim the annexation.

FINDING: A vote on the subject annexation is not required by the City Charter, the MDC, or by ORS Chapter 222.

- 9. Territory annexed into the City shall automatically be given the comprehensive plan designation and zoning designation that is the equivalent to the applicable county designations unless one or more of the following apply:
- a. The petitioner requests a new comprehensive plan designation, or zone designation other than the equivalent City designation in the petition for annexation and files a separate application for zone change and plan amendment;
- b. The City Council proposes a new comprehensive plan designation, or zone designation other than the equivalent City designation in the ordinance proclaiming the annexation; or
- c. The equivalent City designation is inconsistent with the City of Madras Comprehensive Plan, in which case a plan amendment and/or zone change application will be required.

FINDING: The territory proposed to be removed from the existing Madras city limits (Exhibit A) is zoned R-3. The territory The territory proposed to be added to the existing Madras city limits (Exhibit A) is proposed to be zoned R-3.

SECTION 18.70.030 PETITION FOR ANEXATION.

The petitioner for annexation shall complete a petition on the form provided by the Community Development Department and remit the applicable fee. The petition shall include:

- 1. A map depicting the proposed annexation;
- 2. Specific information on each parcel within the proposed annexation area, including:
- a. Current assessed valuation as shown on the Jefferson County Assessor's tax rolls;
- b. Acreage of both public and private property to be annexed;
- c. Map and tax lot number(s);
- d. A legal description of the territory to be annexed, meeting the relevant requirements of ORS 308.225; and
- e. The situs address
- f. The owner of record and mailing address of the owner of record.
- 3. A list of registered voters in the proposed annexation area.
- 4. Where applicable, Consent to Annexation forms, provided by the City, with notarized signatures of all property owners and electors within the proposed annexation area.
- 5. Written findings, which address the following:
- a. Existing land uses within annexation area.
- b. Existing zoning within the annexation area and proposed zoning that is consistent with the Comprehensive Plan.
- c. Whether the annexation area includes the jurisdiction of any special district as defined by ORS 198.010 and whether the annexed area will be withdrawn from the jurisdiction of the special district.
- d. The present availability of urban services within the proposed annexation area, a description of existing infrastructure, the present capacity of existing urban services and supporting infrastructure, the cost of extending and/or improving urban service infrastructure to City standards, and the method and source of financing the costs of extending and/or improving urban service infrastructure to City standards for the

following services:

i. sanitary sewers

ii. storm drainage

iii. streets

iv. water

v. fire

vi. police

vii. power

viii. schools ix. parks

e. Where a zone change is requested or contemplated, a statement indicating the type and nature of any comprehensive plan text or map amendment or zoning ordinance or zoning map amendments that will be sought. A separate zone change and/or plan amendment application shall be filed and may be processed concurrently.

FINDING: The applicant submitted an application satisfying the standards set forth above. No change to the comprehensive plan or corresponding zoning designation is proposed because and 40 acres +/- will be removed from the city limits and the same will be added. The zoning of the land added to the city limits will have the same zoning as the land proposed to be removed. Therefore, there is not change in the zoning or the amount of land zoned R-3. As such there are no impacts of the land proposed to be removed and added to the city limits.

SECTION 18.70.040 ANNEXATION CRITERIA.

Except as otherwise provided in 18.70.050 through 18.70.080 or by state law, lands may be annexed only if the City Council finds that the following criteria are met:

1. The annexation complies with all applicable provisions of ORS 222.

FINDING: The proposed annexation complies with the applicable provisions of ORS 222. Findings under the applicable provisions of ORS 222 are addressed below.

2. The proposed annexation area is contiguous to the City Limits as defined in and as required by ORS 222.

FINDING: The subject properties (Exhibit) are contiguous to the city limits per ORS 222.111.

3. The property is located within the Urban Growth Boundary.

FINDING: The territory proposed to be annexed is located within the Madras Urban Growth Boundary.

- 4. The annexation meets at least one of the following purposes:
- a. To serve lands needing City water or sewer to alleviate a present or potential health hazard; or
- b. To provide land to accommodate future urban development; or
- c. To provide land for provision of needed transportation or utility facilities; or
- d. To ensure that lands adjacent to the City are developed in a manner consistent with City standards.
- e. The annexation is otherwise permitted by the applicable state law.

FINDING: The proposed annexation (boundary change) is needed to accommodate future urban development and is otherwise permitted by ORS Chapter 222.111 et seq.

- 5. The annexation is timely and the petitioner has adequately addressed infrastructure supply and demand issues. This criterion is satisfied where:
- a. An adequate level of the urban services identified in Section 7.3(E)(4) and infrastructure supporting those urban services is presently provided in the annexation area;

FINDING: Attached as Exhibit B is a memorandum dated December 15, 2023 from Public Works Director that there is capacity to provide sanitary sewer, storm drainage, and streets, parks to serve the territory proposed to be annexed into the city limits. Furthermore, that there are no existing sanitary sewer, storm drainage, streets, parks, or domestic water (Deschutes Valley Water Dist.) in the territory proposed to be annexed into the city limits. The cost to extend public infrastructure to the territory proposed to be annexed into the city limits, from their respective terminus, by the developer, at the time of development, in accordance with the City's Development Code (MMC Chapter 18). Additionally, the service providers for fire, power, police, and public schools already provide services within the territory currently in the city limits and will continue to provide such services within the territory proposed to be annexed.

Based on these conditions, it shall be condition of annexation approval that the cost to extend public infrastructure to the territory proposed to be annexed into the city limits from their respective terminus, by the developer, at the time of development, in accordance with the City's Development Code (MMC Chapter 18). Compliance with this condition of approval will ensure that there will be an adequate level of urban services in the territory proposed to be annexed into the city.

CONDITION OF APPROVAL: The cost to extend public infrastructure to the territory proposed to be annexed into the city limits from their respective terminus, by the developer, at the time of development, in accordance with the City's Development Code (MMC Chapter 18).

- b. The City and other service providers are readily capable of extending or upgrading urban services and infrastructure to the area proposed for annexation without undue cost, negatively impacting existing systems, or inhibiting the adequacy of urban services to existing areas within the City Limits; or
- c. Where urban services and infrastructure cannot readily be extended or upgraded, that the fiscal impacts to the City and other service providers of extending or upgrading urban services and supporting infrastructure have been mitigated through an Annexation Agreement or other mechanism approved by the City Council.

FINDING: As detailed above, the territory proposed to be annexed can be served with urban services, provided the developer(s) of the territory pay for the cost to extend infrastructure to an through any portion of the territory that is developed. Provided that the property owner or their heirs or successors comply with the requirement to pay for the cost to extend public infrastructure to the territory proposed to be annexed into the city limits from their respective terminus, by the developer, at the time of development, in accordance with the City's Development Code (MMC Chapter 18), the conditions of annexation approval will ensure that urban services and infrastructure will be provided in timely manner to the territory proposed to be annexed.

6. The proposed annexation complies with the Comprehensive Plan.

FINDING: The City's Comprehensive Plan does not set forth any applicable standards or criteria for annexation other than Policy 5, which provides "The City shall coordinate provision of public services with annexation of land outside the City limits." Rather annexation is guided by state law and the provisions of the Madras Development Code, which implements the Compressive Plan and includes criteria on the

provision of public services. It is noted that this annexation proposal is accompanied by a City of Madras Comprehensive Plan amendment that proposes to amend the Madras Urban Growth Boundary (UGB) for which proposed the same boundary change as this annexation proposal. The proposed Comprehensive Plan amendment (City File No. PA-23-1) will demonstrate compliance with the applicable City of Madras Comprehensive Plan and Statewide Planning Goal consistency (Exhibit F). Furthermore, this annexation approval shall be contingent upon the proposed Madras UGB amendment (File No. PA-23-1) being approved by the City Council.

FINDING: The proposed annexation approval shall be contingent upon the proposed Madras UGB amendment (File No. PA-23-1) being approved by the City Council.

7. The proposed annexation is compatible with the existing topography, potential for future land division, natural hazards and other related considerations.

FINDING: Exhibit F demonstrates consistency with the Statewide Planning Goal 14 Location Factors 1-4 for which demonstrates compliance with the above stated standard.

8. The City Council may require an Annexation Agreement or otherwise condition approval of an annexation as necessary to achieve compliance with the provisions of this section.

FINDING: The proposed annexation complies with the applicable criteria. Conditions of approval are sufficient to ensure future developers of the territory proposed to be annexed into the City are responsible for extending infrastructure to any portion of the territory proposed to be annexed.

SECTION 18.70.050 ANNEXATION BY CONSENT. The City need not hold an election in the City or in any contiguous territory proposed to be annexed, or hold any hearing required by ORS 222 when all the owners of land and the requisite number of electors in that territory consent in writing to the annexation of the land in the territory and file a statement of their consent with the City. Once consent for annexation has been executed, the City, by ordinance, may set the final boundaries of the area to be annexed by a legal description and proclaim the annexation.

FINDING: Exhibit A (Resolution No. 24-2023) identifies that the City of Madras owns and that there are no electors in the territory proposed to annexed. Therefore, the City will hold public hearings before the Madras Planning Commission and adopt such annexation by ordinance for which will include a legal description of the annexed territory.

...

SECTION 18.70.090 FILING OF ANNEXATION RECORDS. The City shall report all changes in the boundaries of the City to the Jefferson County Clerk, Jefferson County Assessor, utility service providers, affected special districts, the Oregon Department of Revenue and the Oregon Secretary of State and any other entities or persons as required by State law.

FINDING: Upon annexation, the City shall report the boundary changes to those required to notified under ORS Chapter 222 and Section Chapter 18.70 of the Madras Development Code.

Chapter 18.80 ADMINISTRATIVE PROVISIONS

These are procedural requirements that have been or will be adhered to as part of these proceedings.

. . .

OREGON REVISED STATUTES, CHAPTER 222

ORS 222.111 Authority and procedure for annexation.

(1) When a proposal containing the terms of annexation is approved in the manner provided by the charter of the annexing city or by ORS 222.111 to 222.180 or 222.840 to 222.915, the boundaries of any city may be extended by the annexation of territory that is not within a city and that is contiguous to the city or separated from it only by a public right of way or a stream, bay, lake or other body of water. Such territory may lie either wholly or partially within or without the same county in which the city lies.

FINDING: The City is proposing to annex the territory (Exhibit A) pursuant to ORS 222.111 to 222.180 and Chapter 18.70 of the Madras Development Code. As shown on the map attached as Figure 1, the subject property is contiguous to the existing city limits. There are no special requirements for annexation set forth in the City Charter.

(2) A proposal for annexation of territory to a city may be initiated by the legislative body of the city, on its own motion, or by a petition to the legislative body of the city by owners of real property in the territory to be annexed.

FINDING: The annexation has been initiated by the City Council through Resolution No. 24-2023.

...

(4) When the territory to be annexed includes a part less than the entire area of a district named in ORS 222.510, the proposal for annexation may provide that if annexation of the territory occurs the part of the district annexed into the city is withdrawn from the district as of the effective date of the annexation. However, if the affected district is a district named in ORS 222.465, the effective date of the withdrawal of territory shall be determined as provided in ORS 222.465.

FINDING: The annexation proposal does not include annexing territory that includes a part less than the entire area of a district identified in ORS 222.510.

(5) The legislative body of the city shall submit, except when not required under ORS 222.120, 222.170 and 222.840 to 222.915 to do so, the proposal for annexation to the electors of the territory proposed for annexation and, except when permitted under ORS 222.120 or 222.840 to 222.915 to dispense with submitting the proposal for annexation to the electors of the city, the legislative body of the city shall submit such proposal to the electors of the city. The proposal for annexation may be voted upon at a general election or at a special election to be held for that purpose.

...

FINDING: This annexation proposal does not need to be submitted to the electors of the City pursuant to ORS 222.120, which is addressed below, and the City Charter does not require such an election.

ORS 222.120

Procedure without election by city electors; hearing; ordinance subject to referendum.

- (1) Except when expressly required to do so by the city charter, the legislative body of a city is not required to submit a proposal for annexation of territory to the electors of the city for their approval or rejection.
- (2) When the legislative body of the city elects to dispense with submitting the question of the proposed annexation to the electors of the city, the legislative body of the city shall fix a day for a public hearing before the legislative body at which time the electors of the city may appear and be heard on the question of annexation.
- (3) The city legislative body shall cause notice of the hearing to be published once each week for two successive weeks prior to the day of hearing, in a newspaper of general circulation in the city, and shall cause notices of the hearing to be posted in four public places in the city for a like period.
- (4) After the hearing, the city legislative body may, by an ordinance containing a legal description of the territory in question:

...

(b) Declare that the territory is annexed to the city where electors or landowners in the contiguous territory consented in writing to such annexation, as provided in ORS 222.125 or 222.170, prior to the public hearing held under subsection (2) of this section; or

...

(7) For the purpose of this section, ORS 222.125 and 222.170, "owner" or "landowner" means the legal owner of record or, where there is a recorded land contract which is in force, the purchaser thereunder. If there is a multiple ownership in a parcel of land each consenting owner shall be counted as a fraction to the same extent as the interest of the owner in the land bears in relation to the interest of the other owners and the same fraction shall be applied to the parcel's land mass and assessed value for purposes of the consent petition. If a corporation owns land in territory proposed to be annexed, the corporation shall be considered the individual owner of that land.

FINDING: There is only one owner (City of Madras) of the land that is proposed to be annexed into the City (Exhibit A).

ORS 222.125

Annexation by consent of all owners of land and majority of electors; proclamation of annexation. The legislative body of a city need not call or hold an election in the city or in any contiguous territory proposed to be annexed or hold the hearing otherwise required under ORS 222.120 when all of the owners of land in that territory and not less than 50 percent of the electors, if any, residing in the territory consent in writing to the annexation of the land in the territory and file a statement of their consent with the legislative body. Upon receiving written consent to annexation by owners and electors under this section, the legislative body of the city, by resolution or ordinance, may set the final boundaries of the area to be annexed by a legal description and proclaim the annexation.

FINDING: The City of Madras is the owner of the territory proposed to be annexed into the city limits. Resolution No. 24-2023 shall serve as evidence that an election is not required to annex the territory (Figure 1) into the Madras city limits.

OREGON REVISED STATUTES, CHAPTER 197

Cities' and counties' planning responsibilities; rules on incorporations; compliance with goals.

- (1) Cities and counties shall exercise their planning and zoning responsibilities, including, but not limited to, a city or special district boundary change which shall mean the annexation of unincorporated territory by a city, the incorporation of a new city and the formation or change of organization of or annexation to any special district authorized by ORS 198.705 to 198.955, 199.410 to 199.534 or 451.010 to 451.620, in accordance with ORS chapters 195, 196 and 197 and the goals approved under ORS chapters 195, 196 and 197. The Land Conservation and Development Commission shall adopt rules clarifying how the goals apply to the incorporation of a new city. Notwithstanding the provisions of section 15, chapter 827, Oregon Laws 1983, the rules shall take effect upon adoption by the commission. The applicability of rules promulgated under this section to the incorporation of cities prior to August 9, 1983, shall be determined under the laws of this state.
- (2) Pursuant to ORS chapters 195, 196 and 197, each city and county in this state shall:
- (a) Prepare, adopt, amend and revise comprehensive plans in compliance with goals approved by the commission;
- (b) Enact land use regulations to implement their comprehensive plans;
- (c) If its comprehensive plan and land use regulations have not been acknowledged by the commission, make land use decisions and limited land use decisions in compliance with the goals;
- (d) If its comprehensive plan and land use regulations have been acknowledged by the commission, make land use decisions and limited land use decisions in compliance with the acknowledged plan and land use regulations

FINDING: The City of Madras Comprehensive Plan is an acknowledged Comprehensive Plan that guides land use planning for properties within Madras urban Growth Boundary as well as the annexation process. The proposed annexation is compliant with City's Comprehensive Plan as evidenced by Exhibit F.

Oregon Administrative Rules, Chapter 660

Division 12: Transportation Planning

660-012-0060

Plan and Land Use Regulation Amendments

- (1) If an amendment to a functional plan, an acknowledged comprehensive plan, or a land use regulation (including a zoning map) would significantly affect an existing or planned transportation facility, then the local government must put in place measures as provided in section (2) of this rule, unless the amendment is allowed under section (3), (9) or (10) of this rule. A plan or land use regulation amendment significantly affects a transportation facility if it would:
- (a) Change the functional classification of an existing or planned transportation facility (exclusive of correction of map errors in an adopted plan);

- (b) Change standards implementing a functional classification system; or
- (c) Result in any of the effects listed in paragraphs (A) through (C) of this subsection based on projected conditions measured at the end of the planning period identified in the adopted TSP. As part of evaluating projected conditions, the amount of traffic projected to be generated within the area of the amendment may be reduced if the amendment includes an enforceable, ongoing requirement that would demonstrably limit traffic generation, including, but not limited to, transportation demand management. This reduction may diminish or completely eliminate the significant effect of the amendment.
- (A) Types or levels of travel or access that are inconsistent with the functional classification of an existing or planned transportation facility;
- (B) Degrade the performance of an existing or planned transportation facility such that it would not meet the performance standards identified in the TSP or comprehensive plan; or
- (C) Degrade the performance of an existing or planned transportation facility that is otherwise projected to not meet the performance standards identified in the TSP or comprehensive plan.

FINDING: The City's Transportation Planning is based on the Comprehensive Plan designations. The territory proposed to be removed from the city limits is zoned R-3 and the territory proposed to be added to the city limits will be zone R-3. The proposal includes the same amount of territory to be removed and added with not change in zoning. Therefore, there are no impacts to the City's Transportation System Plan.

Division 14: Application of the Statewide Planning Goals to Newly Incorporated Cities, Annexation, and Urban Development on Rural Lands

...

660-014-0060

Annexations of Lands Subject to an Acknowledged Comprehensive Plan

A city annexation made in compliance with a comprehensive plan acknowledged pursuant to ORS 197.251(1) or 197.625 shall be considered by the commission to have been made in accordance with the goals unless the acknowledged comprehensive plan and implementing ordinances do not control the annexation.

FINDING: This annexation is consistent with the City of Madras Comprehensive Plan as the territory proposed to be added to the Madras city limits has also demonstrated the compliance with the City's Comprehensive Plan and thereby Statewide Planning Goals as documented in Exhibit F.

Oregon Statewide Planning Goals

Oregon Statewide Planning Goal 1 "To develop a citizen involvement program that insures the opportunity for citizens to be involved in all phases of the planning process."

FINDING: As part of the annexation process, proper notices were sent and public hearings will be held as shown in Table 2 above.

Oregon Statewide Planning Goal 2 "To establish a land use planning process and policy framework as a basis for all decision and actions related to use of land and to assure an adequate factual base for such decisions and actions.", Oregon Statewide Planning Goal 3 "To preserve and maintain agricultural lands." and, Oregon Statewide Planning Goal 4 "Forests"

FINDING: In accordance with Goal 2, the record contains an adequate factual basis to enable the City to make a rational decision on the annexation request. Exceptions to Goals 3 and 4 are not required as the annexed territory will be located within an Urban Growth Boundary and is not agricultural or forest lands.

Oregon Statewide Planning Goal 5 "Open Spaces, Scenic and Historic Areas, and Natural Resources"

FINDING: Goal 5 resources are listed in the City's acknowledged Comprehensive Plan. There are no known significant Goal 5 resources in the territory proposed to be annexed. The territory proposed for annexation is similar to other sites around the City of Madras with regard to open space, scenic views and other Goal 5 values. Utilizing the selected site as proposed will have no noticeable adverse impact on the amount of regional open space or scenic views available.

Impacts on related resources:

Mineral and Aggregate, and Energy Resources: The annexed territory is not located in proximity to any mineral, aggregate, or energy resources.

Fish and Wildlife Habitat: The subject property does not include any specialized habitat for any sensitive fish or wildlife species.

Ecologically and Scientifically Significant: Nothing about the subject property separates it from surrounding areas as ecologically or scientifically significant.

Outstanding Scenic Views: Nothing about the subject property indicates it has a significantly better view than other similar or surrounding sites.

Water areas, wetlands, watersheds, and groundwater resources: The subject property does not contain any water features or resources.

Wilderness Areas: The subject property does not meet the definitions of "wilderness areas" as described within the Oregon State Goals and Guidelines. The parcel has been used for commercial purposes since at least the 1950s and does not contain pristine surroundings or old growth trees.

Historic areas, sites, structures and objects: The subject property has no structures listed on the National Register of Historic Places. No structures or places of historical significance have been determined to exist on or near the property selected.

Cultural areas: The subject property has no known cultural resources.

Oregon Statewide Planning Goal 6 "Air, Water, and Land Resources Quality"

FINDING: No exception to compliance with Goal 6 is proposed. Maintaining or improving the quality of the community's air, water and land resources will be assured through enforcement of state and local regulations. Annexation of the subject property into the City will ensure connections to City sewer system. Annexation of the subject property will not cause the sewer capacity to be exceeded as supported by **Exhibit B**.

Oregon Statewide Planning Goal 7 "Natural Disasters and Hazards"

FINDING: There are no areas within the subject property that are subject to flooding or landslide activity. The wildfire hazard for the subject property is the same as other areas. The subject property is already within a fire protection district and will continue to be served by the Jefferson Fire District.

Oregon Statewide Planning Goal 8 "Recreational Needs"

FINDING: Annexation of the territory will not deprive citizens of recreational opportunities. As development is proposed, the needs for additional park land dedication or in-lieu of fees will be reviewed and assessed or required as necessary to meet the City's parks plans as necessary per Madras Municipal Code Chapter 18.

Oregon Statewide Planning Goal 9 "Economic Development"

FINDING: The proposed annexation does not change the amount of lands designated for industrial or employment uses.

Oregon Statewide Planning Goal 10 "Housing"

FINDING: The proposed annexation will exchange land in the Madras UGB and city limits that is more proximate to existing infrastructure that will enable such land to be developed in a timelier and cost-effective manner for housing.

Oregon Statewide Planning Goal 11 "Public Facilities and Services"

FINDING: Subject to the conditions of approval throughout these findings and decision, public facilities and services are adequate to serve the needs of the area proposed for annexation as documented in Exhibit B.

Oregon Statewide Planning Goal 12 is "To provide and encourage a safe, convenient and economic transportation system."

FINDING: OAR 660-012 implements Oregon Statewide Planning Goal 12. This administrative rule requires the City to prepare and adopt a Transportation System Plan ("TSP") as part of its Comprehensive Plan. The City has adopted a TSP, which has been acknowledged by DLCD.

OAR 660-012-0060 further requires cities to mitigate any significant effects on existing or planned transportation facilities resulting from changes in plans and land use regulations. Upon annexation, the subject property will assume the zoning designation assigned by the City's unified Zoning and Comprehensive Plan map and be subject to the Madras Development Code. Because the City's transportation planning is based on designation in the Comprehensive Plan and that the same amount of land is proposed to be removed and added to the city limits with the same R-3 zoning. Accordingly, the proposed annexation will not allow for increased levels of development above and beyond what is

presently permitted in the territory already in the city limits. Therefore there is not net increase in impact to the City's transportation system.

Oregon Statewide Planning Goal 13 "Energy Conservation"

FINDING: The proposed annexation has no impact on energy usage. However, the subject property's location adjacent to the existing city limits will result in less transportation-related energy use than inclusion of more distant lands.

Oregon Statewide Planning Goal 14 "Urbanization"

FINDING: Goal 14 calls for the 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. This goal provides no specific criteria for annexations. However, Exhibit F provides a factual basis for determine that the related UBG amendment proposal is complaint with Goal 14 and thereby this annexation proposal is compliant with Goal 14.

Oregon Statewide Planning Goals 15-19

FINDING: These Goals are not applicable to the subject property because it is not within the Willamette Greenway, estuarine areas, coastal shoreland, beaches and dunes or ocean resources.

18.80.010 Pre-application conference.

Unless the application is filed by the City, a pre-application conference is required for all Type III and Type IV applicants. Pre-application conferences are also highly recommended for complex applications and for applicants who are unfamiliar with the land use process. The purpose of the conference shall be to acquaint the applicant with the substantive and procedural requirements of this Development Code and to identify issues likely to arise in processing an application. [Ord. 933 § 16.1, 2019.]

FINDING: The City of Madras is the applicant and has coordinated the preparation of the annexation proposal with the Public Works Director and City Attorney. Therefore a pre-application meeting is not required.

18.80.020 Applications.

No land use approval or planning review shall be processed unless the applicant submits a complete application.

- (1) All applications shall:
 - (a) Be submitted by the property owner or a person who has written authorization from the property owner to make the application;
 - (b) Be completed on the applicable form prescribed by the City;
 - (c) Include supporting information required by this Development Code and any other information necessary to, in the judgment of the Community Development Director, demonstrate compliance with applicable standards;
 - (d) Be accompanied by the appropriate application fee, and any applicable public hearing fee, established by the City from time to time; and
 - (e) Provide proof of ownership in the form of a deed or other recorded document; except this requirement shall not apply to:
 - (i) Applications submitted by or on behalf of a public entity or public utility having the power of eminent domain with respect to the property subject to the application; or

(ii) Applications for development proposals sited on lands owned by the state or the federal government.

FINDING: Staff finds Applicant complied with the above stated standards.

(2) For purposes of this Development Code, a complete application refers to an application submitted in conformance with this section and any other requirements of the particular application set forth in this Development Code. An application is not complete unless, in the judgment of the Community Development Director, the application contains sufficient information to address all applicable standards. Acceptance of an application as complete shall not preclude a determination at a later date that additional applicable standards need to be addressed or a later determination that additional information is needed to adequately address applicable standards. [Ord. 933 § 16.2, 2019.]

FINDING: Staff finds Applicant complied with the above stated standards.

18.80.030 Modification of application.

- (1) Subject to this section, an applicant may modify an application at any time during the approval process up until the issuance of an administrative decision or the close of the record for an application requiring a public hearing.
- (2) The decision maker shall not consider any evidence submitted by or on behalf of an applicant that would constitute a modification of application unless the applicant submits a complete application for a modification and agrees in writing to restart the applicable review period as of the date the modification is submitted.
- (3) A modification of application that constitutes a new proposal shall not be permitted as a modification, but shall instead require the filing of a new application.
- (4) For Type III decisions, the decision maker may require that the modified application be renoticed and additional hearings be held.
- (5) Up until the issuance of an administrative decision or the day a public hearing is opened for receipt of oral testimony, the Community Development Director shall have sole authority to determine whether an applicant's submittal requires an application for modification of application or requires submittal of a new application. After such time, the higher decision maker shall make such determinations. The decision maker's determination shall be appealable only to the Oregon Land Use Board of Appeals (LUBA) and shall be appealable only after a final decision is entered by the City on the underlying application. [Ord. 933 § 16.3, 2019.]

FINDING: Applicant has not applied for a modification of application. Should Applicant do apply for a modification in the future, the above stated standards shall apply.

•••

18.80.050 Burden of proof.

The burden of proof to demonstrate compliance with the applicable standards is upon the applicant for all land use approvals and planning reviews. [Ord. 933 § 16.5, 2019.]

FINDING: Staff finds Applicant complied with the above stated standards.

18.80.060 Applicable standards.

The standards and criteria applicable to an application shall be the standards and criteria applicable at the time the application was first submitted. [Ord. 933 § 16.6, 2019.]

FINDING: Staff finds Applicant is the City for which has the same burden of proof as any other applicant to demonstrate compliance with the approval criteria. The City's burden of proof are the findings of fact contained in this land use decision.

18.80.070 Final action.

The City shall take final action on all applications in accordance with the time limitations set forth in ORS 227.178 as the same may be amended from time to time. [Ord. 933 § 16.7, 2019.]

FINDING: Staff finds City may take final action according to the above stated standards.

18.80.080 Time computation.

Except when otherwise provided, the time within which an act is required to be done shall be computed by excluding the first day and including the last day, unless the last day is a Saturday, Sunday, legal holiday, or any day on which the City is not open for business pursuant to a City ordinance, in which case it shall also be excluded. [Ord. 933 § 16.8, 2019.]

FINDING: Staff finds the City is subject to the above stated standards.

18.80.090 Classification of decisions.

All land use approvals and planning reviews shall be processed based on the decision classification hierarchy set forth below. Except where the classification is expressly prescribed in this Development Code, the Community Development Director shall have discretion as to how a particular application, request, or review shall be classified and which review procedures will be used, which shall not be an appealable decision.

...

- (4) Type IV Decisions.
 - (a) Type IV decisions are legislative decisions made by the City Council after public notice and a public hearing before the City Council, which is preceded by a public hearing before, and a recommendation from, the Planning Commission. Legislative applications generally involve broad public policy decisions that apply to other than an individual property. Type IV decisions can also include quasi-judicial decisions made directly by the City Council, as specified in this Development Code, after public notice and a public hearing.
 - (b) All changes to the text of the Comprehensive Plan and Development Code, as well as legislative amendments to the City's Comprehensive Plan map and Zoning Map shall be processed as Type IV decisions. Notice of Type IV map and text amendments shall also be submitted to the Oregon Department of Land Conservation and Development in accordance with state law.
 - (c) Type IV decisions are appealable to the Oregon Land Use Board of Appeals in accordance with state law.
- (5) Additional or alternative procedures for specific applications may be set forth in this Development Code. [Ord. 933 § 16.9, 2019.]

FINDING: Staff determined an application for annexation shall be reviewed as a Type IV decision according the above stated standards.

18.80.100 Hearings officers.

The City Council may appoint a special Hearings Officer to review an application or appeal in place of the Planning Commission or City Council. [Ord. 933 § 16.10, 2019.]

FINDING: This application will be reviewed by the City of Madras Planning Commission and later the City Council.

18.80.110 Notice of application.

- (1) No notice is required for the receipt of an application for a Type I decision.
- (2) Notice of an application for a Type II decision shall be mailed within ten (10) days after City's acceptance of a complete application. Written notice shall also be mailed to the following persons:
 - (a) The applicant.
 - (b) Unless specified elsewhere in this Development Code, to all owners of property within a distance of 250 feet of the subject property at the owner's address of record with the Jefferson County Tax Assessor.
 - (c) Affected public agencies, including the following:
 - (i) Division of State Lands. The City shall notify the Oregon Division of State Lands (DSL) of any application that involves lands that are wholly or partially within areas that are identified as wetlands. Notice shall be in writing using the DSL Wetland Land Use Notification form and shall be sent within five working days of acceptance of a complete application (ORS 227.350).
 - (ii) Department of Fish and Wildlife. The City shall notify the Oregon Department of Fish and Wildlife (ODFW) in writing of any application for development activities within the riparian corridor. A mitigation recommendation shall be obtained from ODFW. Approval of the proposed development shall include a condition requiring compliance with the ODFW mitigation recommendations (OAR 635-415).
 - (iii) Other Agencies. The City shall notify other public agencies, as appropriate, that have statutory or administrative rule authority to review or issue state permits associated with local development applications.
- (3) Notice of Type III decisions shall be the same as that required of Type II decisions except that the Community Development Director shall set the date of the initial public hearing and a notice of the public hearing shall be published in a newspaper of general circulation within the City no less than twenty (20) days and no more than forty (40) days prior to the public hearing.

FINDING: Staff notified all property owners within a 250 foot buffer of subject properties on December 11, 2023 using the address of record obtained from the Jefferson County Tax Assessor. A notice was sent to the Development team on December 15, 2023. A public notice was published in the Madras Pioneer newspaper on December 20, 2023, December 27, 2023, January 10, 2024, January 17, 2024. On December 18, 2023 notices of the Planning Commission and City Council public hearings were posted at Madras City Hall, the Jefferson County Tax Assessor's office, the Madras post office and the Jefferson County Public Library. Notice was also sent to subscribers of the City's Public Notification e-mail list on December 27, 2023 (see Table 2).

- ...
- (5) The failure of a party to receive actual notice shall not invalidate any proceeding or any decision issued pursuant to this Development Code.
- (6) Notwithstanding the provisions of this section, where other provisions of this Development Code specify procedures with greater opportunity for public notice and comment, those procedures shall apply. [Ord. 933 § 16.11, 2019.]

- 18.80.120 Contents of public notice.
- (1) All required public notices shall provide a brief description of the applicant's request, a list of applicable standards, the location of the property, the date, time, and place of the public hearing (if applicable), and instructions on obtaining copies of the application and providing written comment.
- (2) All notices for public hearings shall also contain a statement that recipients may request a copy of the staff report. [Ord. 933 § 16.12, 2019.]

FINDING: The public notices posted and published comply with the above started standards.

18.80.130 Public hearing procedure.

- (1) A public hearing shall be conducted in the following order:
 - (a) The decision maker shall explain the purpose of the public hearing and announce the order of proceedings, including reasonable time limits on presentations by parties.
 - (b) A statement by the decision maker regarding pre-hearing contacts, bias, prejudice, or personal interest shall be made.
 - (c) Any evidence received outside of the hearing shall be stated in the record.
 - (d) Challenges to the decision maker's qualifications to hear the matter must be stated.
 - (e) Order of presentation:
 - (i) Staff report.
 - (ii) Proponent's presentation.
 - (iii) Opponent's presentation.
 - (iv) Interested parties.
 - (v) Proponent's rebuttal.
 - (vi) Staff comments.
 - (vii) Questions from or to the decision maker may be entertained at any time at the decision maker's discretion. [Ord. 933 § 16.13, 2019.]

FINDING: A public hearings were scheduled and noticed before the City of Madras Planning Commission and the City Council as shown in Tables 1 and 2.

18.80.140 Filing of staff report for public hearing.

- (1) A staff report shall be completed at least seven days prior to the public hearing.
- (2) A copy of the staff report shall be filed with the decision maker, mailed to the applicant, and made available to such other persons who request a copy.
- (3) Oral or written modifications and additions to the staff report shall be allowed prior to or at the time of the public hearing. [Ord. 933 § 16.14, 2019.]

FINDING: Staff issued staff reports at least seven days prior to each public hearing.

18.80.150 Prohibition on pre-hearing (ex parte) contacts.

The decision maker or any member thereof shall not communicate directly or indirectly with any party or representative of a party in connection with any quasi-judicial application where a public hearing is scheduled. Any pre-hearing ex parte contact shall be disclosed on the record at the public hearing. [Ord. 933 § 16.15, 2019.]

18.80.160 Challenge for bias, prejudgment, or personal interest.

- (1) Prior to or at the commencement of a quasi-judicial public hearing, any party may challenge the qualifications of the decision maker, or a member thereof, for bias, prejudgment, or personal interest. The challenge shall be documented with specific reasons supported by substantial evidence.
- (2) Should qualifications be challenged, the decision maker, or the member thereof, shall disqualify themselves, withdraw, or make a statement on the record of their capacity to hear the request and make a decision without bias, prejudgment, or personal interest. [Ord. 933 § 16.16, 2019.]

18.80.170 Objections to procedural issues.

Any objections to any procedural issue not raised prior to or during the public hearing are waived. [Ord. 933 § 16.17, 2019.]

18.80.180 Limitation on oral presentations.

The decision maker may set reasonable time limits on oral presentations at public hearings. [Ord. 933 § 16.18, 2019.]

18.80.190 Record.

- (1) All evidence timely submitted and placed before the decision maker shall be entered into the record.
- (2) For public hearings, an audio recording of the hearing shall be made.
- (3) All exhibits presented shall be marked to show the application file number and the identity of the party offering the evidence. [Ord. 933 § 16.19, 2019.]

18.80.200 Notice of decision.

The final decision of the decision maker shall be in writing, signed, and mailed to all parties; provided, however, only the point of contact provided to the City will be delivered notice for any group, entity, or similar collection of individuals constituting a party. [Ord. 933 § 16.20, 2019.]

FINDING: The public hearings will be conducted and decision to all parties according to the above stated standards.

18.80.210 Reapplication limited.

If a specific application is denied, no reapplication for substantially the same proposal may be made for six months or the date specified elsewhere in this Development Code, whichever is greater, following the date of the final decision. [Ord. 933 § 16.21, 2019.]

FINDING: Applicant shall be subject to the above stated procedural standards. If a reapplication is desired by the Applicant, the above stated standards shall apply.

...

18.80.230 Appeals.

- (1) A decision shall be final unless a complete notice of appeal, compliant with MDC <u>18.80.240</u>, is received by the Community Development Department within fifteen (15) days of the mailing date of the final written decision and provided the challenged decision is subject to appeal.
- (2) Who may file an appeal:
 - (a) A party to the application.
 - (b) A person to whom notice was to be mailed in accordance with MDC <u>18.80.110</u>, and to whom no notice was mailed.

- (c) The Planning Commission; provided, however, any appeal by the Planning Commission shall go directly to the City Council. No fee shall be required for an appeal filed by the Planning Commission.
- (3) If more than one party files a notice of appeal on the same decision, the appeals shall be consolidated, noticed, and heard as one proceeding.
- (4) An appeal may be withdrawn in writing by an appellant at any time prior to the rendering of a final decision on the appeal. Subject to the existence of other appeals on the same application, in such event the appeal proceedings shall terminate as of the date the withdrawal is received. An appeal may be withdrawn under this section regardless of whether other nonfiling parties have relied upon the appeal filed by the appellant.
- (5) Any failure to conform to the requirements of MDC <u>18.80.240</u> and MDC <u>18.80.250</u> shall constitute a jurisdictional defect requiring dismissal of the appeal as untimely and/or unperfected.
- (6) Determination of jurisdictional defects in an appeal shall be made by the body to whom an appeal has been made. [Ord. 933 § 16.23, 2019.]

FINDING: Should an appeal be received, the appeal will be reviewed according to the above stated standards.

18.80.240 Notice of appeal.

Every notice of appeal shall contain:

- (1) Proper identification of the decision subject to appeal;
- (2) The specific grounds relied upon for appeal;
- (3) If a hearing was held below, a transcription of the proceedings;
 - (a) Failure to submit a transcript shall render a notice of appeal incomplete and thus untimely. An appellant may cure an incomplete notice of appeal by submitting the transcript within ten (10) days of the date that the notice of appeal was filed; and
- (4) All parties shall be mailed notice of the hearing on appeal within ten (10) days of scheduling the hearing. [Ord. 933 § 16.24, 2019.]

18.80.250 Scope of review on appeal.

- (1) The review of a Type II decision on appeal before the Planning Commission shall be de novo.
- (2) Except where review by the City Council is expressly required, the City Council has discretion whether to hear any appeal for which it has jurisdiction including, without limitation, review of a decision on appeal issued by the Planning Commission. A decision by the City Council to not grant discretionary review of the appeal is the final determination of the City and will be considered to be an adoption by the Council of the decision being appealed, including any interpretations of this Development Code and the City Comprehensive Plan included in the decision. The final decision may be appealed to the Oregon Land Use Board of Appeals as provided by law.
- (3) If the City Council elects to hear to a discretionary appeal, the City Council has further discretion whether to hear the appeal de novo or on the record. Moreover, the City Council may elect to limit review of the appeal to specific issues set forth in the notice of appeal.

(4) The City Council's decision whether to grant discretionary review of an appeal, and the scope of the discretionary review, will be made without testimony or argument from persons interested in the appeal. [Ord. 933 § 16.25, 2019.]

FINDING: Should an appeal be received, the appeal will be reviewed according to the above stated standards.

VIII. Conclusion:

Based on the application submitted and related materials, and the findings in this decision, the applicable approval criteria for Annexation are determined to be satisfied and is approved subject to the conditions of approval listed herein this land use decision and below.

Conditions of Approval:

1. The cost to extend public infrastructure to the territory proposed to be annexed into the city limits from their respective terminus, by the developer, at the time of development, in accordance with the City's Development Code (MMC Chapter 18).

END OF CONDITIONS OF APPROVAL

RESOLUTION NO. 24-2023

A RESOLUTION OF THE CITY OF MADRAS FOR A CITY-INITIATED ANNEXATION OF APPROXIMATELY 42
ACRES COMPRISING A PORTION OF CITY-OWNED REAL PROPERTY IDENTIFIED AS JEFFERSON COUNTY
ASSESSOR'S MAP AND TAX LOT 1114070000100 AND AUTHORIZATION FOR CITY TO MAKE
APPLICATION FOR A CORRESPONDING URBAN GROWTH BOUNDARY AMENDMENT

WHEREAS, Madras Municipal Code ("MMC") Section 18.70.020 permits the Madras City Council ("Council") to initiate a petition for annexation by adopting a resolution;

WHEREAS, MMC Section 18.75.010 permits the Council to initiate an application for amendment of the Madras Comprehensive Plan, including amendments to City of Madras ("City") urban growth boundary ("UGB");

WHEREAS, City is the owner of the real property identified as Jefferson County Assessor's Map and Tax Lot 1114070000100 ("Tax Lot 100");

WHEREAS, Tax Lot 100 is partially located within the UGB and City's jurisdictional boundaries (i.e. City limits);

WHEREAS, City desires and intends to reconfigure the portion of Tax Lot 100 located within the UGB and City limits by withdrawing approximately 42 acres of Tax Lot 100 from the UGB and City limits (the "Withdrawal Area") and replacing it with a different portion of Tax Lot 100 consisting of 42 acres (the "Annexation Area");

WHEREAS, the Council will initiate withdrawal of the Withdrawal Area by a separate resolution;

WHEREAS, the Council desires to initiate annexation of the Annexation Area and to authorize City's application for a corresponding amendment to the UGB such that the Withdrawal Area will be excluded from the UGB and the Annexation Area will be included in the UGB.

NOW, THEREFORE, BE IT RESOLVED, by and through the Madras City Council meeting in regular session as follows:

- 1. <u>Findings</u>. In addition to the above-stated findings contained in this Resolution No. 24-2023 (this "Resolution"), which are hereby adopted, the Council adopts the following findings:
 - a. There are no electors residing or registered within the Annexation Area.
- 2. <u>Annexation Area</u>. Attached as <u>Exhibit A</u> is a preliminary legal description of the Annexation Area. Attached as Exhibit B is a map generally depicting the Annexation Area.
- 3. <u>Consent and Authorization</u>. The City, by and through the Council, hereby consents to and authorizes a petition for annexation of the Annexation Area and corresponding application for an amendment to the Comprehensive Plan to adjust the UGB consistent with the lands proposed for withdrawal and annexation. Council authorizes the City Administrator, or designee, to execute any documents necessary to memorialize such consent and to file appropriate petitions and applications.

- 4. <u>Public Hearing</u>. Council dispenses with submitting the question of the proposed annexation to the voters. A public hearing before the City's Planning Commission on the proposed annexation will be scheduled for January 3, 2024 at 6:30 PM at City Hall. A public hearing on the proposed annexation before Council will be scheduled on February 13, 2024 at 5:30 PM at City Hall. City staff is directed to provide notice of the foregoing public hearing in the manner prescribed by applicable law. City reserves all rights to postpone, continue, and otherwise adjust the scheduling of public hearings.
- 5. <u>Miscellaneous.</u> All pronouns contained in this Resolution and any variations thereof will be deemed to refer to the masculine, feminine, or neutral, singular or plural, as the identity of the parties may require. The singular includes the plural and the plural includes the singular. The word "or" is not exclusive. The words "include," "includes," and "including" are not limiting. Any reference to a particular law, rule, regulation, restriction, code, or ordinance includes the law, rule, regulation, restriction, code, or ordinance as now in force and hereafter amended. The provisions of this Resolution are severable. If any section, subsection, sentence, clause, and/or portion of this Resolution is for any reason held invalid, unenforceable, and/or unconstitutional, such invalid, unenforceable, and/or unconstitutional section, subsection, sentence, clause, and/or portion will (a) yield to a construction permitting enforcement to the maximum extent permitted by applicable law, and (b) not affect the validity, enforceability, and/or constitutionality of the remaining portion of this Resolution. This Resolution may be corrected by order of the Council to cure editorial and/or clerical errors.

APPROVED AND ADOPTED by the, 2023.	Madras City Council and signed by the mayor on this d	ay of
ATTEST:	Mike Lepin, Mayor	
Keli Pollock, City Recorder		



AKS ENGINEERING & FORESTRY

12965 SW Herman Road, Suite 100, Tualatin, OR 97062 P: (503) 563-6151 F: (503) 563-6152 AKS Job #9057-04

OFFICES IN: BEND, OR I KEIZER, OR I THE DALLES, OR I TUALATIN, OR I VANCOUVER, WA I WHITE SALMON, WA

EXHIBIT A

Urban Growth Boundary and City of Madras City Limits Addition

A portion of Parcel 2 of the Partition Plat No. 2010-09, recorded as Microfilm Number 2010-3786, Deed Records of Jefferson County, located in the Northeast One-Quarter and Southeast One-Quarter of Section 7, Township 11 South, Range 14 East, Willamette Meridian, Jefferson County, Oregon, and being more particularly described as follows:

Commencing at the southwest corner of Parcel 1 of Partition Plat No. 2002-12, recorded as Microfilm Number 2002-5926, Deed Records of Jefferson County; thence along the west line of Parcel 2 of said Partition Plat No. 2010-09, South 00°15'35" West 303.96 feet to the Urban Growth Boundary (UGB) limits line and the City of Madras city limits line and the Point of Beginning; thence along said UGB limits line and said city limits line on the following courses: South 69°29'50" East 419.01 feet; thence South 22°53'30" East 568.60 feet; thence South 56°09'41" East 251.84 feet; thence South 20°24'37" East 257.22 feet; thence South 33°53'19" East 345.24 feet; thence South 13°18'01" East 636.80 feet; thence South 41°07'25" East 29.14 feet; thence leaving said UGB limits line and said city limits line on a non-tangent curve to the left (with a radial bearing of North 69°51'04" East) with a Radius of 811.00 feet, a Central Angle of 32°47'38", an Arc Length of 464.19 feet, and a Chord of South 36°32'45" East 457.88 feet; thence South 52°56'34" East 100.88 feet to said UGB limits line and said city limits line; thence along said UGB limits line and said city limits line, South 21°47'55" East 38.41 feet; thence leaving said UGB limits line and said city limits line on a non-tangent curve to the right (with a radial bearing of North 55°02'29" West) with a Radius of 659.00 feet, a Central Angle of 11°14'27", an Arc Length of 129.29 feet, and a Chord of South 40°34'44" West 129.08 feet; thence along a compound curve to the right with a Radius of 379.00 feet, a Central Angle of 54°17'01", an Arc Length of 359.08 feet, and a Chord of South 73°20'28" West 345.80 feet; thence along a compound curve to the right with a Radius of 529.00 feet, a Central Angle of 47°22'39", an Arc Length of 437.43 feet, and a Chord of North 55°49'42" West 425.07 feet to a point of non-tangency; thence South 64°46'49" West 316.44 feet; thence along a non-tangent curve to the right (with a radial bearing of North 64°06'38" East) with a Radius of 650.00 feet, a Central Angle of 13°51'31", an Arc Length of 157.22 feet, and a Chord of North 18°57'36" West 156.84 feet to said UGB limits line and said city limits line; thence along said UGB limits line and said city limits line on the following courses: North 46°54'09" East 89.82 feet; thence

North 21°53'31" East 198.47 feet; thence North 07°51'12" West 212.24 feet; thence North 23°50'29" West 341.53 feet; thence North 52°36'21" West 644.53 feet to the west line of Parcel 2 of said Partition Plat No. 2010-09; thence along said west line and said UGB limits line and said city limits line, North 00°15'35" East 1229.81 feet to the Point of Beginning.

The above described tract of land contains 42.0 acres, more or less.

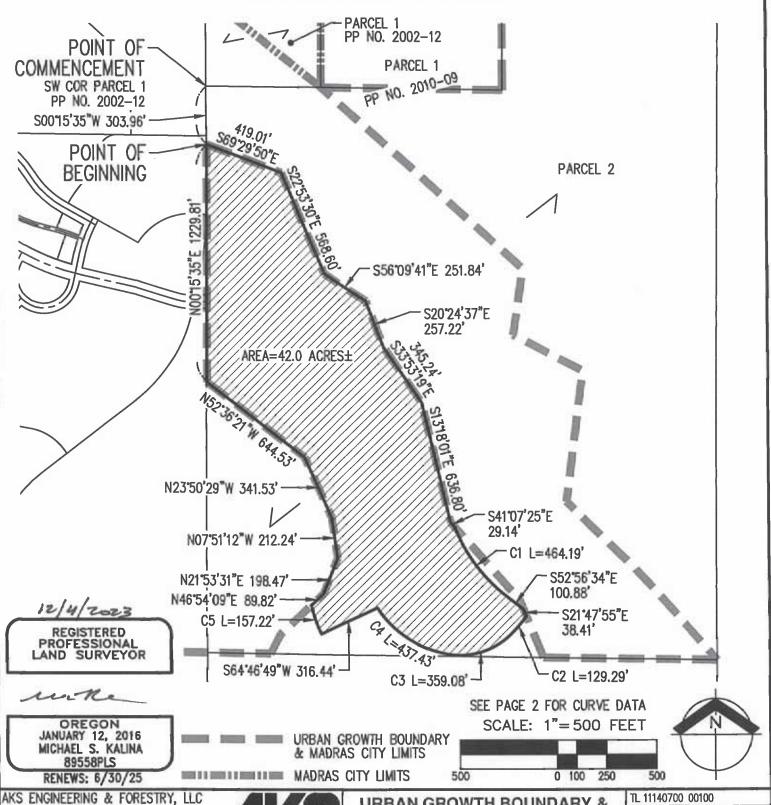
REGISTERED PROFESSIONAL LAND SURVEYOR

wke

JANUARY 12, 2016 MICHAEL S. KALINA 89558PLS RENEWS: 6/30/25

EXHIBIT B

A PORTION OF PARCEL 2 OF PARTITION PLAT NO. 2010-09, LOCATED IN THE NORTHEAST 1/4 & SOUTHEAST 1/4 OF SECTION 7, TOWNSHIP 11 SOUTH, RANGE 14 EAST, WILLAMETTE MERIDIAN, JEFFERSON COUNTY, OREGON



AKS ENGINEERING & FORESTRY, LLC 12965 SW HERMAN RD, STE 100 TUALATIN, OR 97062 503.563.6151 WWW.AKS—ENG.COM



URBAN GROWTH BOUNDARY & CITY OF MADRAS CITY LIMITS ADDITION

IL 11140/00 00100			
DRWN: WCB	CHKD: MSK		
AKS JOB:	EXHIBIT		
9057-04	В		

DWG: 9057-04 20231204 EXB | EXB2.1

EXHIBIT B

A PORTION OF PARCEL 2 OF PARTITION PLAT NO. 2010-09, LOCATED IN THE NORTHEAST 1/4 & SOUTHEAST 1/4 OF SECTION 7, TOWNSHIP 11 SOUTH, RANGE 14 EAST, WILLAMETTE MERIDIAN, JEFFERSON COUNTY, OREGON

CURVE TABLE

CURVE	RADIAL BEARING	RADIUS	CENTRAL ANGLE	ARC LENGTH	CHORD
C1	N69°51'04"E	811.00'	32*47'38"	464.19	\$36°32'45"E 457.88"
C2	N55'02'29"W	659.00'	11"14'27"	129.29'	S40'34'44"W 129.08'
С3		379.00'	5477'01"	359.08	S73°20'28"W 345.80'
C4		529.00'	47'22'39"	437.43'	N55"49'42"W 425.07'
C5	N64'06'38"E	650.00°	13'51'31"	157.22'	N18°57'36"W 156.84

72/4/2623

REGISTERED
PROFESSIONAL
LAND SURVEYOR

OREGON JANUARY 12, 2016 MICHAEL S. KALINA 89558PLS

RENEWS, 6/30/25

AKS ENGINEERING & FORESTRY, LLC 12965 SW HERMAN RD, STE 100 TUALATIN, OR 97062

WWW.AKS-ENG.COM



URBAN GROWTH BOUNDARY & CITY OF MADRAS CITY LIMITS ADDITION

TL 11140700 00100

DRWN: WCB CHKD: MSK AKS JOB: EXHIBIT 9057-04 B

503.563.6151 WWW.Al



December 15, 2023

Nicholas Snead Community Development Director City of Madras 125 SW E Street Madras, OR, 97741

Mr. Snead,

I understand that the City of Madras has proposed to remove 40 acres +/- and add 39 acres +/- from Madras UGB and city limits of the property identified as 11-14-7-100 and that MMC 18.70.030(5)(d) requires findings regarding the availability of urban services within the proposed annexation area, a description of existing infrastructure, the present capacity of existing urban services and supporting infrastructure, the cost of extending and/or improving urban service infrastructure to City standards, and the method and source of financing the costs of extending and/or improving urban service infrastructure to City standards for services provided by the City (i.e. sanitary sewers, storm drainage, streets, water, parks).

Availability Of Urban Services Within The Proposed Annexation Area

The City provides sanitary sewers, storm drainage, streets, parks and none of those services are present in the area of the city limits that is proposed to be removed and they are <u>not</u> located in the area that is proposed to be added to the city limits (see Figure 1 below). However, the aforementioned infrastructure systems have the capacity to serve the territory proposed to be included in the city limits.

Description Of Existing Infrastructure

There is not any existing infrastructure in the territory proposed to be removed from the city limits. There is also no existing infrastructure in the territory that is proposed to be added to the city limits. The closest sanitary sewers, storm drainage, streets, parks facilities are at the terminus of the Yarrow Subdivision (Ph. 1 & 2) and adjacent to the Heights at Yarrow apartment development (11-14-7-305). All development will need to extend infrastructure into the territory that is proposed to be added to the city limits, at the time of development, from location of existing sanitary sewers, storm drainage, streets, parks.

Capacity Of Existing Urban Services And Supporting Infrastructure

The City will provide sanitary sewers, storm drainage, streets, parks infrastructure services to the territory proposed to be annexed. The proposed removal/addition of land to the city limits will not increase the amount of land in the city limits. Furthermore, the territory being proposed to be added from the city limits will have the same zoning (R-3) as the territory proposed be removed (R-3). As a result, there will not be any additional demand on the City's infrastructure systems as a result of increased development potential. The City's capacity to serve the territory proposed to be added to the city limits will remain the same.

Figure 1. Proposed UGB and City Limits Exchange. NE Richards Un" NE Bean Way NE 8 51 E Ashwood Rd SE ESt City Limits UGB SE Fescue Affected Taxlot SE Greenleaf Ln Roads UGB Exchange Area SE Bluegrass Ln Currently Inside UGB, Proposed to Be Taken Out Currently Outside UGB, Proposed to SE J St. Be Brought In 0.25 0.5 Mas

Cost Of Extending Urban Service Infrastructure To City Standards

The cost to serve the territory proposed with public facilities will be born by the developer(s) of that same territory. This responsibility shall be imposed as a condition of annexation.

Source Of Financing The Costs Of Improving Urban Service Infrastructure To City Standards For Services

The developer will bear the entire cost of extending infrastructure to the territory proposed to be added to the city limits.

Should you or anyone else have any questions about the provision of public facilities under the responsibility of the City of Madras, please contact me as necessary.

Sincerely,

Jeff Hurd, P.E.

Public Works Director

City of Madras

541-475-2344

jhurd@ci.madras.or.us



125 SW "E" Street, Madras, OR, 97741 541-475-2344

ADJACENT PROPERTY OWNER NOTIFICATION

DATE: December 11, 2023

FILE: PA-23-1 and AX-23-2

APPLICANT: City of Madras

125 SW E Street Madras, OR, 9771

SITE ADDRESS: Unaddressed

MAP & TAXLOT: 11-14-7-100

ZONING: Planned Residential (R-3)

PROPOSAL: UGB and city limits (annexation) land exchange to remove 40 acres +/-residential land from

the Madras UGB & city limits. That land will be replaced with an equivalent amount of land. The land being removed and added to the UGB is owned by City of Madras and is part of the Yarrow Master Plan area. The area being removed from the UGB is planned R-3 and the area

being added to the UGB will be planned R-3. +/-.

DATE OF HEARINGS: January 3, 2024 (Planning Commission) & February 13, 2024 (City Council)

Adjacent Property Owner:

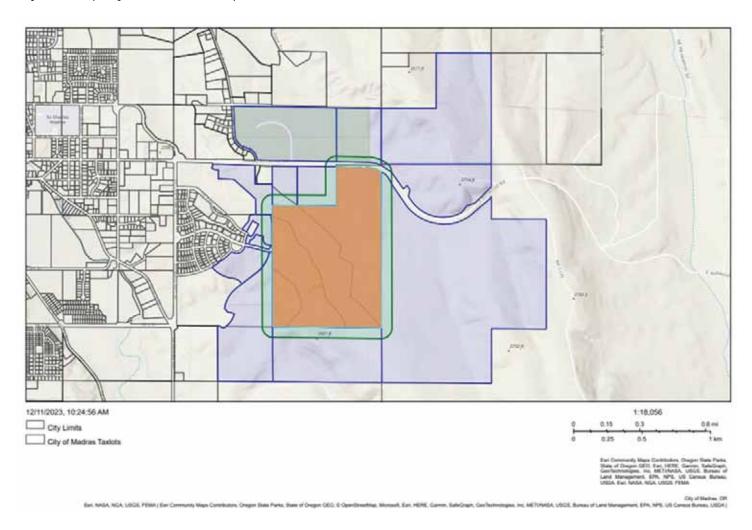
The Madras City Council has scheduled a legislative public hearing on <u>January 3, 2024 (Planning Commission) & February 13, 2024 (City Council) in the Council Chambers at City Hall</u> to consider the City's proposal to amend the Madras UGB based on compliance with the Statewide Planning Goals, the Jefferson County and City of Madras Comprehensive Plans, and MMC 18.75.020(2). The decision to amend the Madras city limits boundary will be based on the following criteria: 1) ORS Chapter 222; 2) the City of Madras Comprehensive Plan; and 3) Chapters 18.15-Zoning and 18.70-Annexation of the City of Madras Development Code. The Madras Planning Commission will conduct a public hearing for the proposal on January 3, 2024, at 6:30 pm in the Council Chambers at City Hall located at 125 SW "E" Street. The Madras City Council will conduct a public hearing for the proposal on February 13, 2024, at 5:30 pm in the Council Chambers at City Hall located at 125 SW "E" Street. Both of these meetings will have the ability to attend via Zoom and in person. Please contact City staff for additional details about how to participate in this meeting and public hearing.

As an adjacent property owner within 250 feet of the location of the proposed land use action, you are entitled notice by City Municipal Code MMC 18.80.110. Written comments may be submitted to the City at City Hall prior to each of the Public Hearings. Oral comments will be accepted at the January 3, 2024 & February 13, 2024, Public Hearings. If you have

any questions, you may also call the Community Development Department at 541-475-2344. The file for this matter is available for public review at City Hall located at 125 SW "E" Street.

Nicholas Snead Community Development Director nsnead@cityofmadras.us 541-475-2344

Adjacent Property Owner Notice Map, File # PA-23-1 & AX-23-2



NOTICE OF PUBLIC HEARINGS

DATE OF HEARINGS: January 3, 2024 (Planning Commission) & February 13, 2024 (City Council)

FILES: PA-23-1 and AX-23-2

APPLICANTS: City of Madras

125 SW E Street Madras, OR, 9771

SUBJECT PROPERTIES: 11-14-7-100

ZONING: Planned Residential (R-3)

PROPOSAL: UGB and city limits (annexation) land exchange to remove 40 acres +/-

residential land from the Madras UGB & city limits. That land will be replaced with an equivalent amount of land. The land being removed and added to the UGB is owned by City of Madras and is part of the Yarrow Master Plan area. The area being removed from the UGB is planned R-3 and the area being added to

the UGB will be planned R-3. +/-.

The decision to amend the Madras UGB will be based on compliance with the Statewide Planning Goals, the Jefferson County and City of Madras Comprehensive Plans, and MMC 18.75.020(2). The decision to amend the Madras city limits boundary will be based on the following criteria: 1) ORS Chapter 222; 2) the City of Madras Comprehensive Plan; and 3) Chapters 18.15-Zoning and 18.70-Annexation of the City of Madras Development Code. The Madras Planning Commission will conduct a public hearing for the proposal on January 3, 2024 at 6:30 pm in the Council Chambers at City Hall located at 125 SW "E" Street. The Madras City Council will conduct a public hearing for the proposal on February 13, 2024 at 5:30 pm in the Council Chambers at City Hall located at 125 SW "E" Street. Both of these meetings will have the ability to attend via Zoom and in person. Please contact City staff for additional details about how to participate in this meeting and public hearing. You may submit written comments prior to each of the public hearings at City Hall. You also may provide oral comments during the public hearings. If you have any questions, you may also call Nicholas Snead, Community Development Director at 541-475-2344. The files for these matters is available for public review at City Hall located at 125 SW "E" Street.

Madras Pioneer Publishing Dates: December 20, 2023

December 27, 2023 January 10, 2024 January 17, 2024 From: Nick Snead

To: Alex Farrington; Andrea Breault; Angie Brewer; Brett Goodman; Brooke Berry; Catherine Doran; Chris Funk;

Daniel Hall; Donald Morehouse; Fatima Taha; Gary Cahoun; Gary Dejarnatt; Jared Earnest; Jeff Hurd; Jeff McCaulou; Jeff Rasmussen; Jeff Rasmussen; Jeremy Faircloth; Jim Preuss; Joel Gehrett; Jon Harrang; Joseph Franell; Josh Ainger; Josh Bailey; Katrina Flande; Katrina Weitman; Matt Powlison; Max Hamblin; Michael Baker; Michele Quinn; Mike Britton; Nancy Coleman; Nick Snead; ODOT Planning Mgr 4; Pam Watson; Pat Kruis; Phil Stenbeck; Rob Berg; Scott Edelman; Simon White; Tanya Cloutier; TJ Johannsen; Turo; Will Ibershof; Zachary

<u>Quinn</u>

Subject: Notice of City of Madras Annexation Proposal Date: Friday, December 15, 2023 5:06:18 PM

Development Team Member:

Below are links to the application materials submitted for an Annexation request amend the Madras city limits.

Please be advised that the City has sent a notice to all properties within 250 feet of the subject property on December 11, 2023. Please submit comments to the City by no later than December 26, 2023 regarding this land use application. Please let me know if you need any additional information.

FILE: AX-3-1

APPLICANT/ City of Madras **PROPERTY OWNER:** 125 SW E Street

Madras, OR, 97741

SITE ADDRESS: No address assigned at this time

MAP & TAXLOT: 11-14-7-100

ZONING: Planned Residential (R-3)

PROPOSAL: Amend the Madras city limits (annexation) by removing 40 acres +/- from

the city limits and replacing an equivalent amount of land to the Madras city limits. The land being removed and added to the city limits is owned by City of Madras and is part of the Yarrow Master Plan area. The area being removed from the city limits is zoned R-3 (City Zoning) and the area being

added to the city limits will be zoned R-3.

DECISION TYPE: Type IV, Legislative.

PUBLIC HEARING: Legislative hearings before the Madras Planning Commission and City

Council will be held on January 3, 2024 at 6:30 PM, in the Council Chambers at the Madras Police Station/City Hall located at 125 SW E Street, Madras, OR, 97741 and on February 13, 2024 at 5:30 PM, in the Council Chambers at the Madras Police Station/City Hall located at 125 SW E Street, Madras, OR,

97741.

APPLICATION MATEIRALS:

AX-23-3_Findings and Decision_121523_nsnead.docx: https://acrobat.adobe.com/link/track? uri=urn:aaid:scds:US:0b897cb0-5b1f-4cc9-9301-6f0f7ff88177

11.14.7.pdf" at: https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:d0aa5ddc-f87a-469e-96a5-ad5a34c66ef4

Resolution No. 24-2023 w Exhibit_NOT SIGNED.pdf: https://acrobat.adobe.com/link/review? uri=urn:aaid:scds:US:07e27edf-bd11-43e1-bf3a-8b696b32ac60

Exhibit C_Public Works Director Letter of Public Facility Adequacy.pdf:

https://acrobat.adobe.com/link/review?uri=urn:aaid:scds:US:c6a6f091-6dfa-4dc8-90e8-3288e50516a5

Madras UGB Swap Findings for Notice v3_nsnead edits.docx: https://acrobat.adobe.com/link/track? uri=urn:aaid:scds:US:dd7220f4-eb75-4849-bc9c-1bbfce94453b

Nicholas Snead, AICP Community Development Director City of Madras 541-475-2344 nsnead@cityofmadras.us www.ci.madras.or.us

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Madras UGB Land Exchange Justifications and Findings

November 2023

Prepared for: City of Madras

Draft Report



KOIN Center 222 SW Columbia Street Suite 1600 Portland, OR 97201 503-222-6060

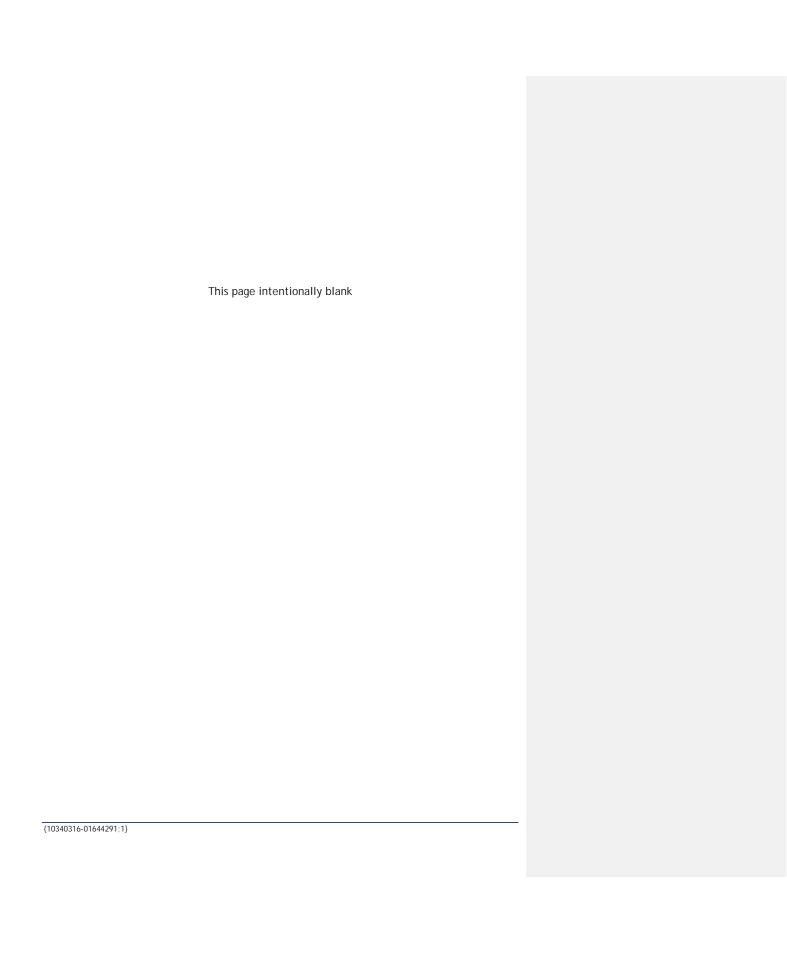


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Summary: Map (UGB) Amendments

Madras is proposing a UGB land exchange to remove residential land from the UGB and replace it with an equivalent amount of land. The land being removed and added to the UGB is owned by City of Madras and is part of the Yarrow Master Plan area. The area being removed from the UGB is planned R-3 and the area being added to the UGB will be planned R-3.

The area for removal from the UGB is part of the Yarrow Master Plan, planned for development of housing built around a golf course. This area has moderate slopes that make it more difficult to build smaller, more affordable units, which is part of the rational for developing this area around a proposed golf course.

The area for addition to the UGB is directly west of the area proposed for removal. It is also part of the Yarrow Master Plan area. The plans for development of these two areas have changed over the years, along with the changes to development requirements in R-3. The Bean Foundation, owners of Yarrow, are focused on building a residential neighborhood with a mixture of housing types, affordable at a range of prices points. As a result, the Bean Foundation are in the process of revising the Yarrow Master Plan, with the intention of including the area proposed to be brought into the UGB.

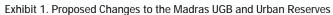
This narrative supports the following amendments to the Madras UGB Land Exchange:

Urban Growth Boundary Change

- 1. Change the Madras UGB to remove a portion (42 acres, 39 of which are buildable) of tax lot 1114070000100. The lot is owned by the City of Madras and is currently vacant. It is planned by the City as Planned Residential Development (R-3).
- 2. Change the Madras UGB to add in a different portion of tax lot 1114070000100. The area proposed to be brought into the UGB is about 42 acres, with 2 acres of constrained land, resulting in 40 acres of buildable land. The area proposed for inclusion in the UGB is owned by the City of Madras, designated as urban reserves, and is vacant.

Urban Reserve Change

- Once the land being removed from the UGB (42 acres of land) is removed, add it to Madras Urban Reserves.
- 2. Bring land from the Madras Urban Reserves (42 acres of land) into the Madras UGB.



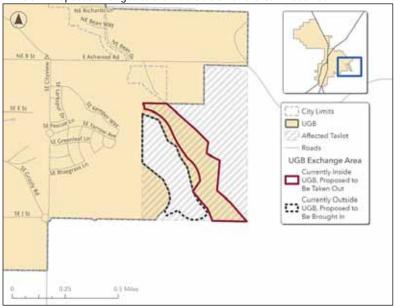
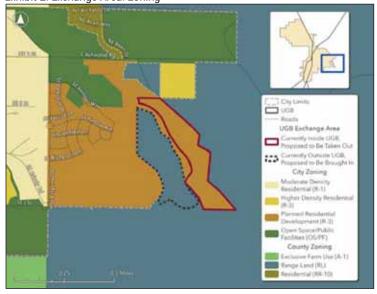


Exhibit 2. Exchange Area: Zoning



1. Introduction

Background

Madras is proposing a UGB land exchange to remove residential land from the UGB and replace it with an equivalent amount of land. The land being removed and added to the UGB is owned by City of Madras and is part of the Yarrow Master Plan area. The area being removed from the UGB is designated as R-3 under the Madras Comprehensive Plan and the area being added to the UGB will similarly be planned as R-3.

The area for removal from the UGB is part of the Yarrow Master Plan, planned for development of housing built around a golf course. This area has moderate slopes that make it more difficult to build smaller, more affordable units, which is part of the rational for developing this area around a proposed golf course.

The area for addition to the UGB is directly west of the area proposed for removal. It is also part of the Yarrow Master Plan area. The plans for development of these two areas have changed over the years, along with the changes to development requirements in R-3. The Bean Foundation, owners of Yarrow, are focused on building a residential neighborhood with a mixture of housing types, affordable at a range of prices points. As a result, the Bean Foundation are in the process of revising the Yarrow Master Plan, with the intention of including the area proposed to be brought into the UGB.

This report presents the proposed changes and findings to support the proposed UGB land exchange.

Applicable Statewide Planning Policy

State Requirements for UGB Land Exchange

OAR 660-024-0070 provides direction on exchanging land within an UGB and replacing it with land presently located outside of the UGB. The requirement of OAR 660-024-0070(2) apply for the land removed and the provisions of Goal 14 Administrative Rule (OAR Chapter 660, Division 024) apply to the land included in the UGB as part of the exchange. Such exchanges also trigger requirements under ORS 197A.320

OAR 660-024-0070 UGB Adjustment

Under OAR 660-024-0070 provides direction on removing and replacing land in the UGB. A government may exchange land if it determines that the removal does not violate applicable statewide planning goals and rules and that the land supply within the UGB provides roughly the same supply of buildable land after the exchange. In addition, the exchange should not provide urban services to the land moved outside of the UGB, nor that it preclude efficient

provision of urban services to buildable land within the UGB. The land removed from the UGB must be planned and zoned for rural uses.

Madras proposes to remove 42 acres of land planned as R-3 from its UGB and replace it with 42 acres of land that will be planned R-3 once in the UGB. The land removed will be re-zoned to Range Land (RL) by the Jefferson County. The land added to the UGB is within Madras' Urban Reserves and the land removed from the UGB will be added into the City's Urban Reserves (as addressed below).

ORS 197A.320 requirements, OAR 660-024-0065, and OAR 660-0024-0067

ORS 197A.320 and OAR 660-024-0065 establish a process for identifying a study area to evaluate land for inclusion in the UGB, which includes all land adjacent and within the one-half mile buffer of the Madras UGB. In addition, the study area included all exceptions areas within one mile of the Madras UGB. The final study area must include an amount of land that is at least twice the amount of land needed to replace the land removed from the Madras UGB. The final study area may exclude land from the evaluation of land for inclusion based on areas where it is impracticable to provide necessary public facilities or services to the land or areas with significant development hazards.

OAR 660-0024-0067 establishes the following priority of land for inclusion within a UGB:

- "First Priority" is urban reserve, exception land, and nonresource land.
- "Second Priority" is marginal land: land within the study area that is designated as marginal land
- "Third Priority" is forest or farm land that is not predominantly high-value farm land
- "Fourth Priority" is agricultural land that is predominantly high-value farmland

Goal 14 location factors

As noted in Goal 14, the location of the urban growth boundary and changes to the boundary shall be determined by evaluating alternative boundary locations consistent with ORS 197A.320 and with consideration of the following factors:

- 1. Efficient accommodation of identified land needs:
- 2. Orderly and economic provision of public facilities and services;
- 3. Comparative environmental, energy, economic and social consequences; and
- Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the urban growth boundary.

As noted above, Goal 14 allows local governments to specify characteristics, such as parcel size, topography or proximity, necessary for land to be suitable for an identified need.

Organization of this Document

This document is organized as follows:

- Chapter 2. Land Proposed for Removal from the Madras UGB presents the land proposed to be removed from the UGB.
- Chapter 3. Alternatives Analysis for Establishment of the UGB Land Exchange Study Area presents the process of establishing the study area and findings about inclusion of land in the final study area.
- Chapter 4. Goal 14 Locational Factors includes the evaluation and findings of each study subarea for the Goal 14 locational factors.
- Chapter 5. County and City Requirements for UGB Changes presents findings for compliance with Jefferson County and City of Madras requirements for UGB changes.
- Chapter 6. Statewide Goal Consistency Analysis presents findings that demonstrate that the proposed UGB concept complies with applicable state planning requirements.

2. Land Proposed for Exchange

This chapter describes the proposed UGB exchange land based on the requirements of OAR 660-024-0070. Madras proposes to remove approximately 39 buildable acres of land designated as R-3 under the Madras Comprehensive Plan and replace it with approximately 40 buildable acres of land that the City will designate R-3. The land proposed for removal has been planned for residential development in the Yarrow Master Plan, with larger-lot single-family housing built around a golf course. The land proposed for inclusion in the UGB is adjacent to the land proposed for removal and the revised Yarrow Master Plan expects to develop the land with a wider variety of housing, as required by Madras' Development Code, based on changes the City made to accommodate missing middle housing (adopted in July 2022).

The land proposed for inclusion in the UGB will be more integrated into Madras' neighborhoods, roads, and other infrastructure, as described in Chapter 3.

Proposed UGB Adjustment

OAR 660-024-0070 Describes the process for making adjustments to a city's UGB, including removing land from the UGB and exchanging it for other lands.

660-024-0070 UGB Adjustments

- (1) A local government may adjust the UGB at any time to better achieve the purposes of Goal 14 and this division. Such adjustment may occur by adding or removing land from the UGB, or by exchanging land inside the UGB for land outside the UGB. The requirements of section (2) of this rule apply when removing land from the UGB. The requirements of Goal 14 and this division[and ORS 197.298] apply when land is added to the UGB, including land added in exchange for land removed. The requirements of ORS 197.296 may also apply when land is added to a UGB, as specified in that statute. If a local government exchanges land inside the UGB for land outside the UGB, the applicable local government must adopt appropriate rural zoning designations for the land removed from the UGB prior to or at the time of adoption of the UGB amendment and must apply applicable location and priority provisions of OAR 660-024-0060 through 660-020-0067.
- (2) A local government may remove land from a UGB following the procedures and requirements of ORS 197.764. Alternatively, a local government may remove land from the UGB following the procedures and requirements of 197.610 to 197.650, provided it determines:
 - (a) The removal of land would not violate applicable statewide planning goals and rules;
 - (b) The UGB would provide a 20-year supply of land for estimated needs after the land is removed, or would provide roughly the same supply of buildable land as prior to the removal, taking into consideration land added to the UGB at the same time;

- (c) Public facilities agreements adopted under ORS 195.020 do not intend to provide for urban services on the subject land unless the public facilities provider agrees to removal of the land from the UGB and concurrent modification of the agreement;
- (d) Removal of the land does not preclude the efficient provision of urban services to any other buildable land that remains inside the UGB; and
- (e) The land removed from the UGB is planned and zoned for rural use consistent with all applicable laws.
- (3) Notwithstanding sections (1) and (2) of this rule, a local government considering an exchange of land may rely on the land needs analysis that provided a basis for its current acknowledged plan, rather than adopting a new need analysis, provided:
 - (a) The amount of buildable land added to the UGB to meet:
 - (A) A specific type of residential need is substantially equivalent to the amount of buildable residential land removed, or
 - (B) The amount of employment land added to the UGB to meet an employment need is substantially equivalent to the amount of employment land removed, and
 - (b) The local government must apply comprehensive plan designations and, if applicable, urban zoning to the land added to the UGB, such that the land added is designated:
 - (A) For the same residential uses and at the same housing density as the land removed from the UGB, or
 - (B) For the same employment uses as allowed on the land removed from the UGB, or
 - (C) If the land exchange is intended to provide for a particular industrial use that requires specific site characteristics, only land zoned for commercial or industrial use may be removed, and the land added must be zoned for the particular industrial use and meet other applicable requirements of ORS 197A.320(6).

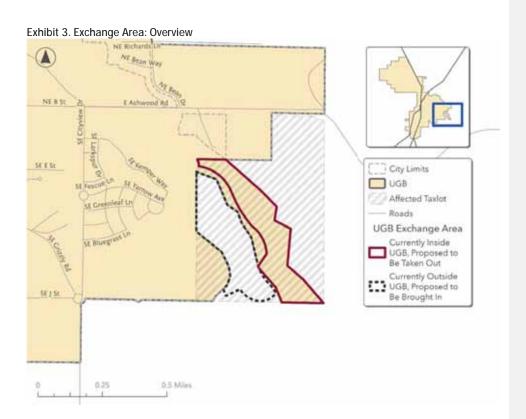
Land Proposed for Exchange from the Madras UGB

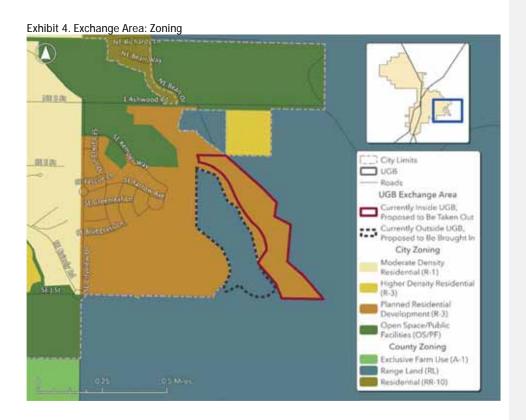
The land proposed for removal from the Madras UGB, as shown in Exhibit 3, is located on a portion of tax lot 1114070000100. The lot is owned by the City of Madras and is currently vacant. It is located within the City limits, comprehensive planned and zoned by the City as Planned Residential Development (R-3) (Exhibit 4).

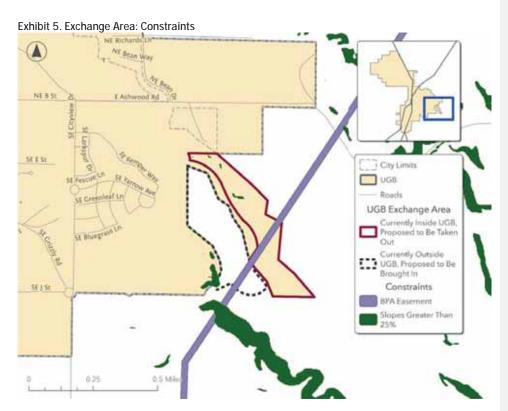
The total acreage of the lot is 197 acres, with 185 acres of buildable land. The lot is constrained by two features as shown in Exhibit 5—slopes greater than 25% in elevation and a 50-foot-wide easement for Bonneville Power Administration (BPA) transmission lines. These constraints together account for 12 acres of land.

Only a portion of this tax lot is proposed for removal, shown on in Exhibit 3. The area of land proposed to be taken out of the UGB is about 42 acres, 3 acres of which are constrained, leaving 39 acres buildable.

Exhibit 3 shows the area proposed to be included in the UGB, which is immediately adjacent to the area proposed for removal. It is also part of tax lot 1114070000100. The area proposed to be brought into the UGB is about 42 acres, with 2 acres of constrained land, resulting in 40 acres of buildable land. The area proposed for inclusion in the UGB is owned by the City of Madras, zoned Range Land (but included in City's urban reserves), and is vacant.







The area for removal from the UGB is part of the Yarrow Master Plan, planned for development of housing built around a golf course. This area has moderate slopes that make it more difficult to build smaller, more affordable units, which is part of the rational for developing this area around a proposed golf course.

The original Yarrow Master Plan was developed before the City updated its Development Code to require more diversified housing as part of the master planning process and to allow "missing middle" housing types in its residential zones. As of July 2022, the R-3 zone allows for development of different housing types at a range of densities, as described below.

- Single-family detached: at minimum lot size of 6,000 square feet or 7.3 dwelling units
 per acre. Assuming that housing builds out at 80% of maximum allowed density and
 that land for rights-of-way accounts for 25% of land, the maximum density would be 4.4
 dwelling units per acre.
- Townhouse: at up to 29 dwelling units per acre. Assuming that housing builds out at 80% of maximum allowed density and that land for rights-of-way accounts for 25% of land, the maximum density would be 15 dwelling units per acre.

- One to four units: at up to 23 dwelling units per acre. Assuming that housing builds out at 80% of maximum allowed density and that land for rights-of-way accounts for 25% of land, the maximum density would be 13.8 dwelling units per acre.
- Cottage Cluster: at up to 21 dwelling units per acre. Assuming that housing builds out at 80% of maximum allowed density and that land for rights-of-way accounts for 25% of land, the maximum density would be 12 dwelling units per acre.
- Apartments with 5 or more units: at up to 26 dwelling units per acre. Assuming that
 housing builds out at 80% of maximum allowed density and that land for rights-of-way
 accounts for 25% of land, the maximum density would be 16.8 dwelling units per acre.

The plans for development of the parts of Yarrow adjacent to the areas proposed for the exchange have changed over the years, along with the changes to development requirements in R-3. The Bean Foundation, owners of Yarrow, are focused on building a residential neighborhood with a mixture of housing types, affordable at a range of prices points. As a result, the Bean Foundation are in the process of revising the Yarrow Master Plan, with the intention of including the area proposed to be brought into the UGB.

Recent development and planned development in the Yarrow Master Plan area reflect these plans. In specific, the Heights at Yarrow is 144 units of multifamily housing that was developed in the last few years. The Yarrow Master Plan (July 2022) includes plans for development of: nearly 500 single-family units (about half on large lots and half on small-medium lots), 11 townhouses, potential for multifamily on about 30 acres of land (but no units estimated yet), 48 acres of parks and open space, 10.5 acres for a future school, and 0.4 acres of commercial mix-ed use.

Madras requires a minimum overall density of 7 dwelling units per gross acre in the R-3 zone (for the entire subdivision) and that master planned subdivisions (which are required for any residential development in excess of 10 acres) with at least 50 dwellings include at least two types dwelling units and proposals with 100 or more must contain at least three types of dwelling units. Exhibit 6 shows the potential capacity of the exchange area, given the allowed densities described above. The Yarrow Master Planned called for development of this area as single-family detached housing. In the future the Bean Foundation intends to develop the new area with a mixture of housing types, as allowed and required in the R-3 zone.

Exhibit 6 shows the potential capacity of the 39 acres of land proposed to be removed from the UGB by housing type. The densities used in Exhibit 6 are based on those used in the 2023 *Madras Housing Capacity Analysis* and the densities allowed by Madras' Development Code. The capacity for the 40 acres of land proposed for inclusion in the UGB is within 3% of the capacity of land proposed for removal, with the difference being the slight difference in buildable acres between the two areas.

Exhibit 6. Exchange Area: Potential Capacity

Exhibit 6. Exchange Area. 1 otential supporty									
	Area inside the UGB, Proposed to be Removed			Area outside the UGB, Proposed to be Added into the UGB					
Zone/Housing Type	Buildable Acres	Allowed Density (DU/ Acre)	Capacity (Dwelling Units)	Buildable Acres	Allowed Density (DU/ Acre)	Capacity (Dwelling Units)			
R-3	39			40					
Single-family detached		5.2	203		5.2	208			
Townhouse		15.0	585		15.0	600			
One to four dwelling units		13.8	538		13.8	552			
Apartments - 5+ du		16.8	655		16.8	672			

The City will apply the Planned Residential Development (R-3) Comprehensive Plan designation and zone to the land brought into the UGB. The County will apply the Range Land (RL) Comprehensive Plan designation and zone to the land removed from the UGB.

Compliance with OAR 660-024-0070

OAR 660-024-0070 Describes the process for making adjustments to a city's UGB, including removing land from the UGB and exchanging it for other lands.

660-024-0070 UGB Adjustments

(1) A local government may adjust the UGB at any time to better achieve the purposes of Goal 14 and this division. Such adjustment may occur by adding or removing land from the UGB, or by exchanging land inside the UGB for land outside the UGB. The requirements of section (2) of this rule apply when removing land from the UGB. The requirements of Goal 14 and this division[and ORS 197.298] apply when land is added to the UGB, including land added in exchange for land removed. The requirements of ORS 197.296 may also apply when land is added to a UGB, as specified in that statute. If a local government exchanges land inside the UGB for land outside the UGB, the applicable local government must adopt appropriate rural zoning designations for the land removed from the UGB prior to or at the time of adoption of the UGB amendment and must apply applicable location and priority provisions of OAR 660-024-0060 through 660-020-0067.

Finding: The proposal includes removal of land presently within the UGB in exchange for land presently located outside of the UGB. The requirements for exchange of those respective lands are addressed below. ORS 197.296 is that statute setting forth the requirements for local governments to conduct analysis of housing capacity and needed housing and is addressed below. The removed land will be given a rural zoning designation through a contemporaneous action from Jefferson County.

(2) A local government may remove land from a UGB following the procedures and requirements of ORS 197.764. Alternatively, a local government may remove land from

the UGB following the procedures and requirements of 197.610 to 197.650, provided it determines:

Finding: ORS 197.764 is not applicable to the subject property as it is not assessed for farm use. Accordingly, the City is proposing to follow the procedures and requirements of ORS 197.610 to 197.650, which outlines the process for a post-acknowledgement amendments to comprehensive plans and land use regulations.

(a) The removal of land would not violate applicable statewide planning goals and rules:

Finding: The proposal complies with applicable statewide planning goals and rules as set out below.

(b) The UGB would provide a 20-year supply of land for estimated needs after the land is removed, or would provide roughly the same supply of buildable land as prior to the removal, taking into consideration land added to the UGB at the same time;

Finding: The proposal results in roughly the same supply of buildable lands within the UGB as the exchange involves the same number of gross acres and the addition of one buildable acre.

(c) Public facilities agreements adopted under ORS 195.020 do not intend to provide for urban services on the subject land unless the public facilities provider agrees to removal of the land from the UGB and concurrent modification of the agreement;

Finding: There are no public facilities agreements to provide urban services on the land proposed for removal from the UGB.

(d) Removal of the land does not preclude the efficient provision of urban services to any other buildable land that remains inside the UGB; and

Finding: Removal of the proposed lands does not inhibit efficient provision of urban services to any buildable lands that will remain within the UGB.

(e) The land removed from the UGB is planned and zoned for rural use consistent with all applicable laws.

Finding: The land removed from the UGB will be zoned Range Land by contemporaneous action of Jefferson County consistent with applicable laws.

- (3) Notwithstanding sections (1) and (2) of this rule, a local government considering an exchange of land may rely on the land needs analysis that provided a basis for its current acknowledged plan, rather than adopting a new need analysis, provided:
 - (a) The amount of buildable land added to the UGB to meet:
 - (A) A specific type of residential need is substantially equivalent to the amount of buildable residential land removed, or

. . .

- (b) The local government must apply comprehensive plan designations and, if applicable, urban zoning to the land added to the UGB, such that the land added is designated:
 - (A) For the same residential uses and at the same housing density as the land removed from the UGB, or

. . .

Finding: The City need not adopt a new housing needs analysis because the amount of building land added to the UGB is substantially equivalent to the land removed and will be subject to the same plan designation and zoning and thus have no net effect on the supply of residential lands needed to meet any particular residential need.

3. Alternatives Analysis for Establishment of the UGB Land Exchange Study Area

Chapter 2 showed that Madras is proposing to remove 39 acres of buildable land from the UGB and replace it with 40 acres of adjacent buildable land and that the proposal complies for requirements of land removal. This chapter presents the alternatives analysis required by OAR 660-024-0060 as well as findings related to the prioritization described in ORS 197A.320 as necessary to analyze compliance for the land to be added to the UGB.

Establishment of Study Area for UGB Land Exchange

Definition of the Preliminary Study Area

Exhibit 7 shows the study area for the alternatives analysis based on the following requirements:

660-024-0065 Establishment of Study Area to Evaluate Land for Inclusion in the UGB

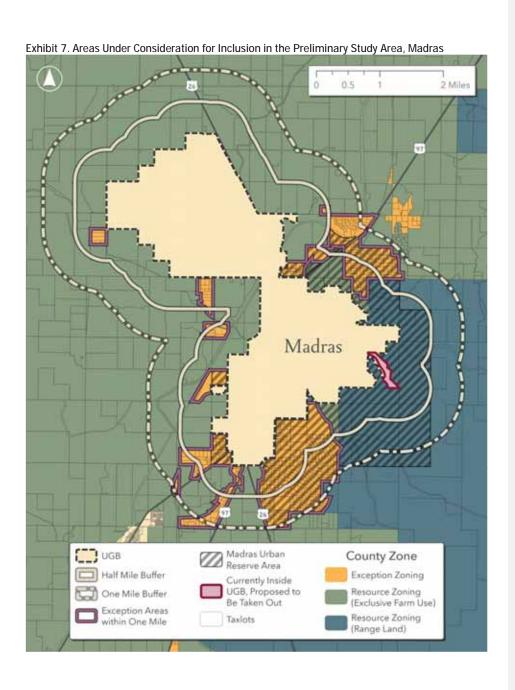
- (1) When considering a UGB amendment to accommodate a need deficit identified in OAR 660-024-0050(4), a city outside of Metro must determine which land to add to the UGB by evaluating alternative locations within a "study area" established pursuant to this rule. To establish the study area, the city must first identify a "preliminary study area" which shall not include land within a different UGB or the corporate limits of a city within a different UGB. The preliminary study area shall include:
 - (a) All lands in the city's acknowledged urban reserve, if any;
 - (b) All lands that are within the following distance from the acknowledged UGB:
 - (A) For cities with a UGB population less than 10,000: one-half mile;
 - (B) For cities with a UGB population equal to or greater than 10,000: one mile;
 - (c) All exception areas contiguous to an exception area that includes land within the distance specified in subsection (b) and that are within the following distance from the acknowledged UGB:
 - (A) For cities with a UGB population less than 10,000: one mile;
 - (B) For cities with a UGB population equal to or greater than 10,000: one and one-half miles:

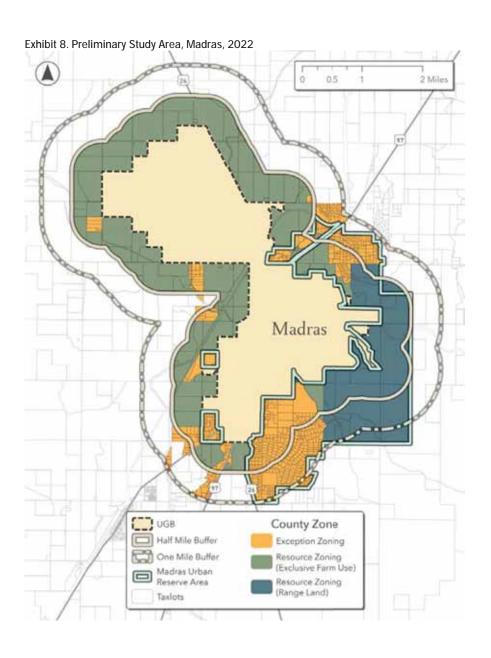
The subject proposal is not the result of a need deficit identified in OAR 660-024-0050(4). The City has nonetheless conducted such an analysis to demonstrate the appropriateness of the proposal.

Based on the foregoing provisions, the City evaluated all lands adjacent to the Madras UGB for suitability for residential uses. For purposes of the Alternatives Analysis, the City reviewed land within the one-half mile buffer of the Madras UGB, as shown in Exhibit 7, as well as all Exceptions Zones within a one-mile buffer.

The preliminary study area includes:

- 6,809 acres of land within one-half mile of the Madras UGB.
- 3,970 acres of land in urban reserves, including that beyond 1 mile from the UGB
- 343 acres of land in exceptions zoning that is between ½ and 1 mile from the Madras UGB and not within the City's urban reserve (which includes an additional 892 of exceptions area).





Refining the Preliminary Study Area

The analysis of residential land is organized by classes of land that correspond to the OAR 660-024-0067(2) priorities for inclusion of land into a UGB. The evaluation of the subareas considers the following:

660-024-0067 Evaluation of Land in the Study Area for Inclusion in the UGB; Priorities

- (1) A city considering a UGB amendment must decide which land to add to the UGB by evaluating all land in the study area determined under OAR 660-024-0065, as follows
 - (a) Beginning with the highest priority category of land described in section (2), the city must apply section (5) to determine which land in that priority category is suitable to satisfy the need deficiency determined under OAR 660-024-0050 and select for inclusion in the UGB as much of the land as necessary to satisfy the need.
 - (b) If the amount of suitable land in the First Priority category is not sufficient to satisfy all the identified need deficiency, the city must apply section (5) to determine which land in the next priority is suitable and select for inclusion in the UGB as much of the suitable land in that priority as necessary to satisfy the need. The city must proceed in this manner until all the land need is satisfied, except as provided in OAR 660-024-0065(9).
 - (c) If the amount of suitable land in a particular priority category in section (2) exceeds the amount necessary to satisfy the need deficiency, the city must choose which land in that priority to include in the UGB by applying the criteria in section (7) of this rule.
 - (d) In evaluating the sufficiency of land to satisfy a need under this section, the city may use the factors identified in sections (5) and (6) of this rule to reduce the forecast development capacity of the land to meet the need.
 - (e) Land that is determined to not be suitable under section (5) of this rule to satisfy the need deficiency determined under OAR 660-024-0050 is not required to be selected for inclusion in the UGB unless its inclusion is necessary to serve other higher priority lands.
- (2) Priority of Land for inclusion in a UGB:
 - (a) First Priority is urban reserve, exception land, and nonresource land. Lands in the study area that meet the description in paragraphs (A) through (C) of this subsection are of equal (first) priority:
 - (A) Land designated as an urban reserve under OAR chapter 660, division 21, in an acknowledged comprehensive plan;
 - (B) Land that is subject to an acknowledged exception under ORS 197.732; and
 - (C) Land that is nonresource land.

- (b) Second Priority is marginal land: land within the study area that is designated as marginal land under ORS 197.247 (1991 Edition) in the acknowledged comprehensive plan.
- (c) Third Priority is forest or farm land that is not predominantly high-value farm land: land within the study area that is designated for forest or agriculture uses in the acknowledged comprehensive plan and that is not predominantly high-value farmland as defined in ORS 195.300, or that does not consist predominantly of prime or unique soils, as determined by the United States Department of Agriculture Natural Resources Conservation Service (USDA NRCS). In selecting which lands to include to satisfy the need, the city must use the agricultural land capability classification system or the cubic foot site class system, as appropriate for the acknowledged comprehensive plan designation, to select lower capability or cubic foot site class lands first.
- (d) Fourth Priority is agricultural land that is predominantly high-value farmland: land within the study area that is designated as agricultural land in an acknowledged comprehensive plan and is predominantly high-value farmland as defined in ORS 195.300. A city may not select land that is predominantly made up of prime or unique farm soils, as defined by the USDA NRCS, unless there is an insufficient amount of other land to satisfy its land need. In selecting which lands to include to satisfy the need, the city must use the agricultural land capability classification system to select lower capability lands first.

Exhibit 9 shows exclusion of land that does not meet the requirements of OAR 660-024-0067(1), excluding land that is not "First Priority" as defined in OAR 660-024-0067(2). This step removed all non "First Priority" lands by excluding lands zoned Exclusive Farm Use (EFU) or Range Land (RL) within the ½ mile buffer of Madras UGB unless they were designated as urban reserves or non-resource land.

This leaves a total of 4,508 acres within the study area, with 3,923 acres within the City's urban reserves and 585 acres in exception zoning within the one-mile UGB buffer. All of these lands are "First Priority" lands.

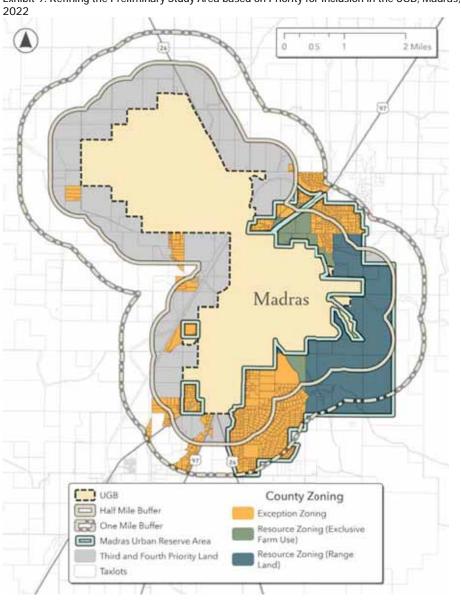


Exhibit 9. Refining the Preliminary Study Area based on Priority for Inclusion in the UGB, Madras,

Areas Non-Contiguous with the UGB that are Impracticable to Serve

The next step is to remove areas that are not contiguous to the UGB and are impracticable to serve based on OAR 660-024-0065(7).

OAR 660-024-0065 Establishment of Study Area to Evaluate Land for Inclusion in the UGB

- (7) For purposes of subsection (4)(a), the city may consider it impracticable to provide necessary public facilities or services to the following lands:
 - (a) Contiguous areas of at least five acres where 75 percent or more of the land has a slope of 25 percent or greater, provided that contiguous areas 20 acres or more that are less than 25 percent slope may not be excluded under this subsection. Slope shall be measured as the increase in elevation divided by the horizontal distance at maximum ten-foot contour intervals:
 - (b) Land that is isolated from existing service networks by physical, topographic, or other impediments to service provision such that it is impracticable to provide necessary facilities or services to the land within the planning period. The city's determination shall be based on an evaluation of:
 - (A) The likely amount of development that could occur on the land within the planning period;
 - (B) The likely cost of facilities and services; and,
 - (c) Any substantial evidence collected by or presented to the city regarding how similarly situated land in the region has, or has not, developed over time.
 - (c) As used in this section, "impediments to service provision" may include but are not limited to:
 - (A) Major rivers or other water bodies that would require new bridge crossings to serve planned urban development;
 - (B) Topographic features such as canyons or ridges with slopes exceeding 40 percent and vertical relief of greater than 80 feet;
 - (C) Freeways, rail lines, or other restricted access corridors that would require new grade separated crossings to serve planned urban development;
 - (D) Significant scenic, natural, cultural or recreational resources on an acknowledged plan inventory and subject to protection measures under the plan or implementing regulations, or on a published state or federal inventory, that would prohibit or substantially impede the placement or construction of necessary public facilities and services.

Exhibit 10 shows areas that are not contiguous to the UGB and are impracticable to serve.

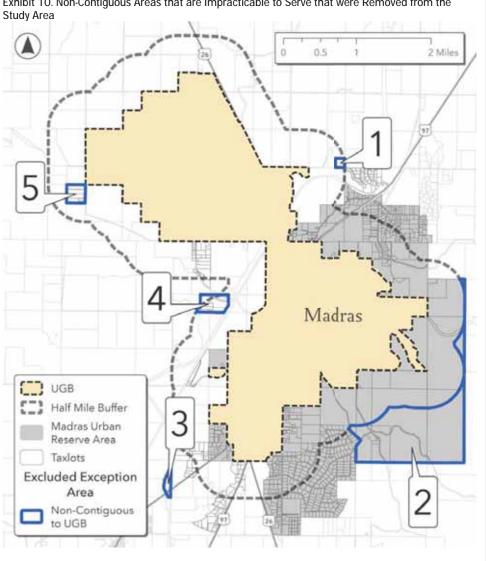


Exhibit 10. Non-Contiguous Areas that are Impracticable to Serve that were Removed from the

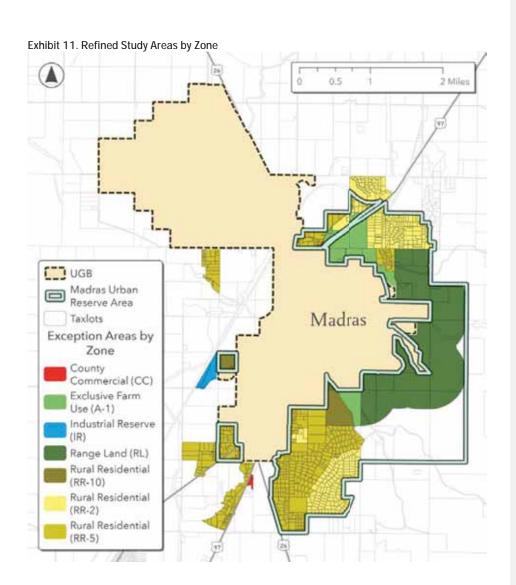
The following areas are all either exceptions areas (some within ½ mile of the UGB and some beyond ½ mile) or urban reserves beyond ½ mile of the UGB. These areas are all impracticable to serve, given their distance from the UGB. In addition, some of these areas contain too few acres to meet the identified land need of about 39 areas on their own.

- Area 1. This area is 10 acres in exceptions zoning outside of the Urban Reserves, located 1,991 feet/0.04 miles from the UGB. It is too small to meet the land needs and is impracticable to serve on its own.
- Area 2. This area is 700 acres in RL zoning and within the Urban Reserves. It is ½ mile or more from the UGB and some parts are beyond 1 mile of the UGB. The distance to the UGB, plus any portion of Area 4 includes well more than the amount of land needed to meet the identified land need of about 39 acres. Land in Area 2 is impracticable to serve on its own without including a substantial amount of land closer to the UGB.
- Area 3. This area is 17 acres in exceptions zoning outside of the Urban Reserves. It is too small to meet the land needs and is impracticable to serve on its own.
- Area 4. This area is 59 acres in exceptions zoning outside of the Urban Reserves, located ¼ mile to more than ½ mile from the UGB. It is impracticable to serve, given its distance from the UGB.
- Area 5. This area is 40 acres in exceptions zoning outside of the Urban Reserves. While
 the northeast corner of this area touches a corner of the UGB, there is no direct road
 connection from the UGB that doesn't also fall in other non-UGB areas. It is located
 adjacent to Industrial areas of Madras, away from existing residential neighborhoods. It
 is impracticable to serve on its own.

Refined Preliminary Study Area

Exhibit 11 shows the refined preliminary areas for the alternatives analysis, which are either exceptions areas or urban reserve areas. These are all First Priority for inclusion in the UGB, consistent with 660-024-0067(2). These areas together account for 4,508 acres of land in the following zoning:

- Exclusive Farm Use (A-1) within Urban Reserves: 308 acres
- Range Land (RL) within Urban Reserves: 1,225 acres
- Exceptions areas in the following zoning:
 - County Commercial (CC): 10 acres
 - Industrial Reserve (IR): 46 acres
 - Rural Residential (RR-2): 770 acres
 - Rural Residential (RR-5): 1,198 acres
 - Rural Residential (RR-10): 132 acres



Identifying Unsuitable Areas within the Study Area

The next step is identifying areas within the study area that are unsuitable for potential inclusion in the UGB based on OAR 660-024-0067.

Parcelization and Development Patterns

660-024-0067 Evaluation of Land in the Study Area for Inclusion in the UGB; Priorities

- (5) With respect to section (1), a city must assume that vacant or partially vacant land in a particular priority category is "suitable" to satisfy a need deficiency identified in OAR 660-024-0050(4) unless it demonstrates that the land cannot satisfy the specified need based on one or more of the conditions described in subsections (a) through (g) of this section: Existing parcelization, lot sizes or development patterns of rural residential land make that land unsuitable for an identified employment need; as follows:
 - (A) Parcelization: the land consists primarily of parcels 2-acres or less in size, or
 - (B) Existing development patterns: the land cannot be reasonably redeveloped or infilled within the planning period due to the location of existing structures and infrastructure."

OAR 660-024-0067(5) allows a city to assume that land that is parcelized or has a development pattern the is unlikely to redevelop or infill within the planning period can be assumed not to meet the identified need. Exhibit 12 shows land with high levels of parcelization or subdivisions, which are future plans for parcelization.

Exhibit 12 shows areas with a large amount of highly parcellated land, identified by visual inspection of clusters of highly parcellated tax lots, and/or a high number of subdivisions.

- Parcelized land. 488 acres, shown in pink in Exhibit 12, are in parcels 2 acres or smaller.
 These lands are considered unsuitable for potential inclusion in the UGB based on OAR 660-024-0067(5).
- Subdivisions. 898 acres, shown in green in Exhibit 12, are within an existing subdivision. Some of these parcels are currently larger than 2 acres but are planned for future development in smaller lots.

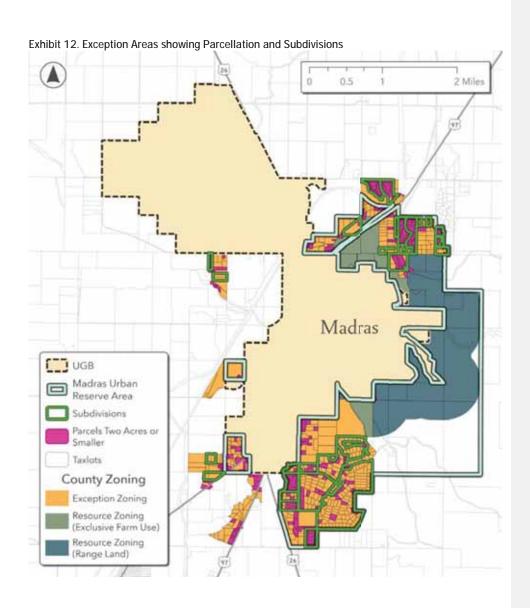


Exhibit 13 shows areas removed from the study area based on high degree of parcelization and subdivisions. This includes four areas shown in red, all of which are in exceptions zoning.

UGB
Half Mile Buffer
Madras Urban
Reserve Area
Taxlots
Excluded Exception
Areas
High Degree of
Parcelization and
Subdivisions

Exhibit 13. Areas with Parcellation and Subdivisions removed from the Study Area

This results in the removal of the following:

- Area 6: This area has a high degree of parcelization and existing subdivision. This area
 has 625 acres, 43% of which is in parcels 2 acres or smaller or in a subdivision. In
 addition, most of this area is not adjacent to the existing UGB, making it impracticable to
 provide future services to without inclusion of substantially more land than the
 identified land need.
- Area 7: This area has a high degree of parcelization and existing subdivision. This area
 has 914 acres, 74% of which is in parcels 2 acres or smaller or in a subdivision. In
 addition, most of this area is not adjacent to the existing UGB, making it impracticable to
 provide future services to without inclusion of substantially more land than the
 identified land need.
- Area 8: This area has a high degree of parcelization and existing subdivision. This area has 308 acres, 30% of which is in parcels 2 acres or smaller or in a subdivision. The areas with larger than 2 acre parcels are generally located further from the UGB, including some beyond ½ mile from the UGB. This makes it impracticable to provide future services to without inclusion of substantially more land than the identified land need.
- Area 9: This area has a high degree of parcelization and existing subdivision. This area has 77 acres, 41% of which is in parcels 2 acres or smaller or in a subdivision. The areas with larger than 2 acre parcels are generally located further from the UGB, including some beyond ½ mile from the UGB. This makes it impracticable to provide future services to without inclusion of substantially more land than the identified land need.

Commercial and Industrial Planned Areas

Exhibit 14 shows exceptions areas with County Commercial (CC) and Industrial Reserves (IR).

Madras

UGB

Half Mile Buffer
Madras Urban
Reserve Area
Taxlots
Excluded Exception
Areas
Non-Residential
Zoning

Exhibit 14. Commercial and Industrial planned area removed from the Study Area

This results in removal of the following:

- Area 10: This area is zoned County Commercial (CC). It has 8 acres of land. In addition, it is not contiguous to the UGB, is impracticable to serve, and too small to meet the need for about 39 acres of land,.
- Area 11: This area is zoned Industrial Reserve (IR). It has 46 acres of land.

Final Study Area with Subareas

Exhibit 15 breaks up the remaining 1,679 acres in the study area into 21 subareas for evaluation for inclusion in the UGB. This area is more than twice the land need for about 39 acres of buildable land.

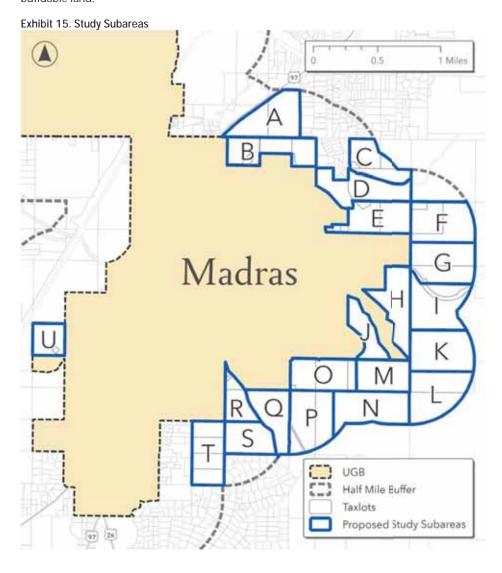


Exhibit 16 shows constraints with the subareas.

Exhibit 17 shows the subareas by zone, total acres, vacant acres, and vacant unconstrained acres. Exhibit 15 shows these subareas geographically.

Exhibit 17. Madras UGB Land Exchange Study Subareas

Study Subarea	Total Acres	Unconstrained Acres	Total Parcels	Average Parcel Size	Existing Dwelling Units	Average Parcel with Dwelling Unit Size	Vacant Parcels	Average Vacant Parcel Size
A	92	92	2	46	-	-	2	46
В	83	83	6	14	3	12	3	15
С	64	64	4	15	1	2	3	19
D	87	87	2	22	-	-	2	22
E	85	83	6	14	5	9	1	40
F	98	89	3	33	1	35	2	32
G	100	86	2	32	-	-	2	32
Н	84	80	1	83	-	-	1	83
1	100	92	1	45	-	-	1	45
J	47	44	1	47	-	-	1	47
K	100	98	1	100	-	-	1	100
L	99	91	2	33	-	-	2	33
M	68	51	1	68	-	-	1	68
N	99	85	1	99	-	-	1	99
0	82	80	4	20	-	-	4	20
Р	100	97	3	33	1	51	2	23
Q	69	37	1	63	1	63	-	=
R	43	41	4	11	2	17	2	4
S	59	55	1	59	1	59	-	-
T	80	80	4	20	4	20	-	-
U	40	40	2	20	1	1	1	39
Total	1,679	1,556	52		20		32	

For the final study area and subareas in Exhibit 15, the City finds:

Finding: The City finds it has at least twice the amount of land needed for the land exchange, consistent with OAR 660-024-0065(5).

Finding: The City finds that land within Urban Reserves and Exceptions Areas provides enough land to meet Madras' needs for a land exchange, without considering land beyond the First Priority, consistent with OAR 660-024-0067(2).

Detailed Subarea Maps

Exhibit 18 through Exhibit 28 shows up close views of the remaining subareas. All areas are within the Madras Urban Reserves.

Exhibit 18. Study Subareas A and B

City Limits
UGB
Half Mile
Buffer
Proposed
Study
Subareas
Constraints
Roads
Taxlots

B

NE Loucks Rd

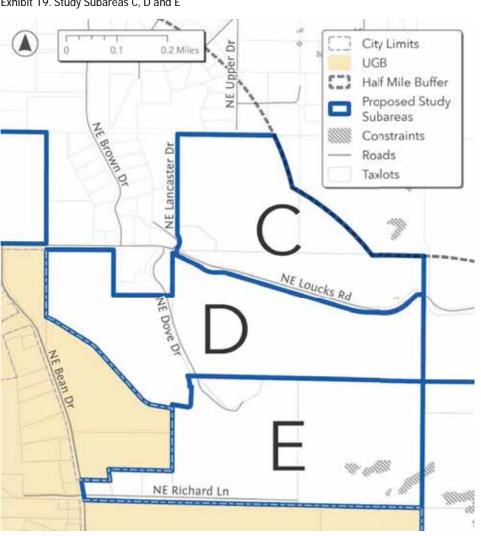
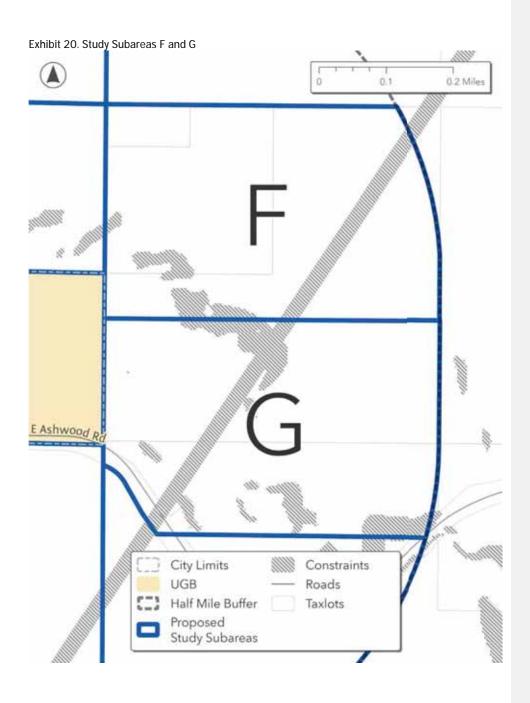
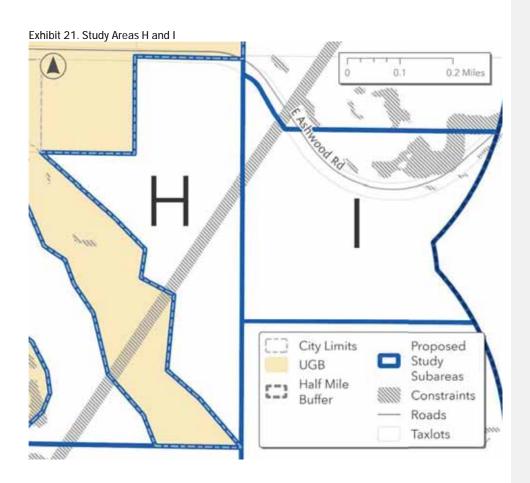
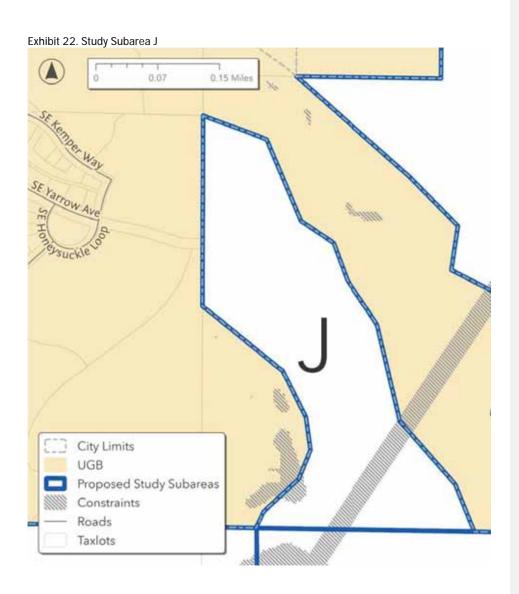
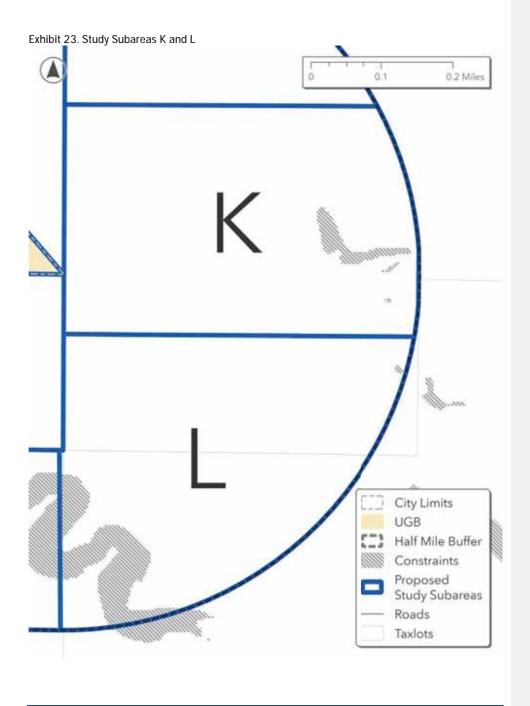


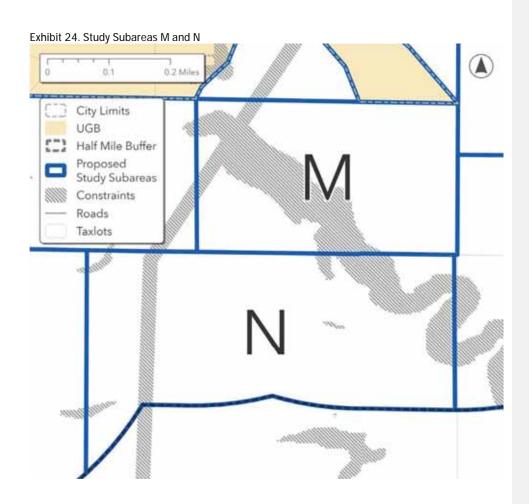
Exhibit 19. Study Subareas C, D and E

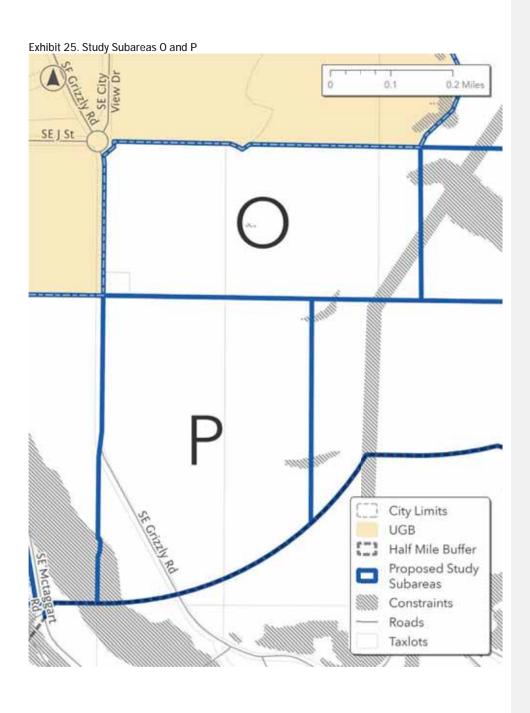


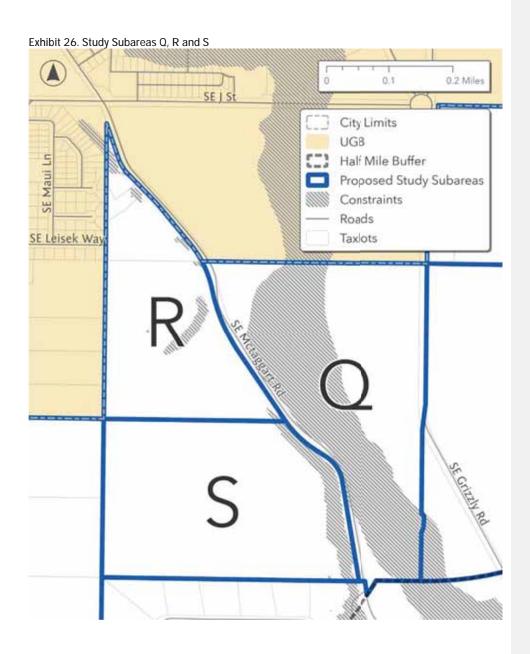


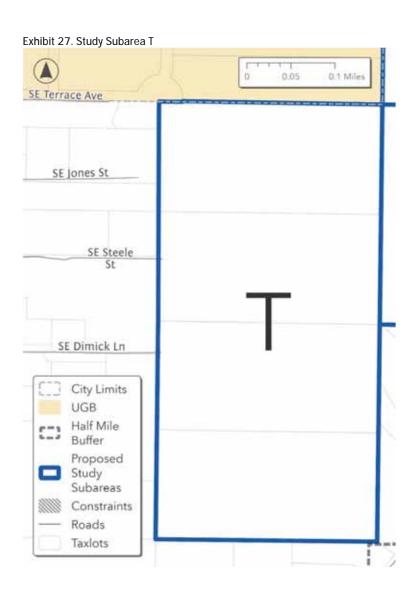


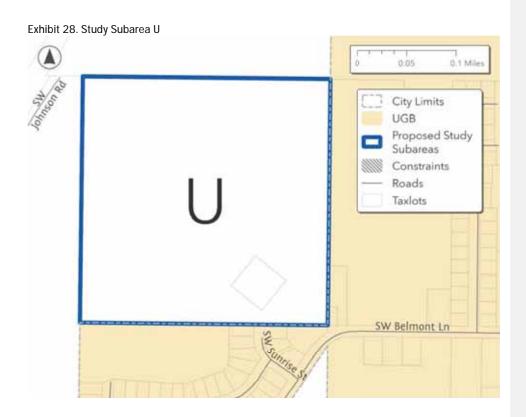












4. Goal 14 Locational Factors

Chapter 4 includes additional findings demonstrating compliance Goal 14 locational factors. Goal 14 establishes four boundary location factors that must be considered when reviewing alternative boundaries:

The location of the urban growth boundary and changes to the boundary shall be determined by evaluating alternative boundary locations consistent with ORS 197A.320 and with consideration of the following factors:

- (1) Efficient accommodation of identified land needs;
- (2) Orderly and economic provision of public facilities and services;
- (3) Comparative environmental, energy, economic and social consequences; and
- (4) Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB.

The following sections provide an evaluation of the proposed lands, with the proposed land exchange area of subarea J.

Findings demonstrating consistency with Goal 14 Location Factors 1-4

The four Goal 14 location factors are: (1) Efficient accommodation of identified land needs; (2) Orderly and economic provision of public facilities and services; (3) Comparative environmental, energy, economic and social consequences; and (4) Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB.

The following sections provide findings showing consideration of the Goal 14 locational factors.

Factor 1: Efficient accommodation of identified land needs

Factor 1 includes characteristics such as: efficient urban development opportunities, ability to meet needs for identified housing types, and good urban form to allow for integration with the existing city.

Exhibit 29. Evaluation of Factor 1 Characteristics

אוווטור ב /. בישוממנוסו	5	
Subarea	Efficient Urban Development Opportunities	Evaluate of Efficient Accommodation of Residential Land Needs
A	Two parcels.	Subarea A is about a 650 foot distance from the Madras
	 All parcels are over 5 acres. 	UGB. It if was brought into the UGB, it would create an
	 The study area is not adjacent to the UGB. It is about 	"island" in the UGB above subarea B. This would have a
	650 feet from the existing UGB.	negative impact on Madras' urban form and would not
	 No local road connection. It is about 900 feet from the 	efficiently accommodate residential land needs.
	closest local road, NE Jask St.	
	No improved roads within subarea.	
۵	Free of constraints. Sive according to the contraints.	ae objecta bleom bae BIL odt of tacceibe of Becredies
Δ	Six parcels.	Subalea d'is aujacelli to ille ded alla would provide all
	 93% of land is in parcels 5 acres or larger. 	opportunity for extension of existing neighborhood
	 One parcel is long and narrow, spanning vertically 	development, along NE Lakeside Dr. There are no direct
	across the entire subarea and splitting off about 1/3rd	connection between Subarea B and Madras' existing
	of the western portion.	development. This subarea would not provide substantial
	 Area is adjacent to UGB. 	connections to existing and developing neighborhoods within
	 Area is adjacent to NE Loucks Rd. 	tne Madras UGB.
	 No improved roads within subarea. 	
	Minimal constraints include small portion of steep	
C	slopes and small lake/pond.	
၁	 Four parcels. 	Subarea C is 1,400 feet distance from the Madras UGB. It it
	 97% of land is in parcels 5 acres or larger. 	was brought into the UGB, it would create an "island" in the
	 Not adjacent to UGB. It is about 1,400 feet from the 	UGB for Sub-area D. This would have a negative impact on
	existing UGB.	Madras' urban form and would not efficiently accommodate
	 Adjacent to NE Lancaster Dr and NE Loucks Rd. 	residential land needs.
	 No significant constraints. 	
Ω	 Two parcels. 	Subarea D is adjacent to the UGB but that land is zoned by
	 All parcels are larger than 5 acres. 	the City as Open Space. This subarea would not provide
		substantial connections to existing and developing

Subarea		Efficient Urban Development Opportunities	Evaluate of Efficient Accommodation of Residential Land Needs
	• Eas	Easternmost parcel split horizontally by subarea	neighborhoods within the Madras UGB. Additionally, this
	por	boundary.	subarea would create an extension to the UGB without
	• Adj	Adjacent to UGB.	connection with the rest of the UGB. It would have a negative
	NE.	NE Dove Dr runs vertically through area, splitting off	impact on Madras' urban form and would not efficiently
	apc	about 1/3rd of the western portion.	accommodate residential land needs.
	• Adj	Adjacent to NE Loucks Rd.	
	• Fre	Free of constraints.	
Ш	• Six	Six parcels.	Subarea E is adjacent to the UGB and would provide an
	• Abc	About 90% of land is in parcels 5 acres or larger.	opportunity for extension of existing neighborhood
	• Ode	Oddly shaped parcel under 5 acres to the north of NE	development along NE Bean Dr. Additionally, it would fill in a
	ρο Ο	Dove Dr.	small gap within the eastern UGB boundary, but a majority of
	• Eas	Easternmost parcel split horizontally by subarea	tne area would be adjacent to city-zoned open space.
	por	boundary.	
	• Adj	Adjacent to UGB.	
	• Dir	Direct road connection for UGB by way of NE Bean Dr	
	anc	and NE Richard Ln.	
	• NE	NE Dove Dr continues into this subarea.	
	%0	2% of land in the eastern nortion constrained by steen	
	ols	z % or iana in the castern portion constrained by steep slopes over 15%.	
Ł	• Thr	Three parcels.	Subarea F is minimally adjacent to the UGB, sharing only
	• 95	95% of land is in parcels 5 acres or larger.	about 350 feet of coverage between the two boundaries.
	• Eas	Easternmost parcel split horizontally by subarea	Bringing this area into the UGB would create an eastward
	por	boundary.	extension of the UGB without contiguous areas to the north
	• Are	Area is only minimally adjacent to UGB.	or south. This would have a negative impact on Madras'
	• Sul	Subarea is about 1,300 feet from the closest improved	urban jorm and would not efficiently accommodate residential land needs
	roa	road within the UGB, E Ashwood Rd.	
	• Sul	Subarea only has unimproved dirt roads.	
	%6 •	9% of land is constrained by steep slopes over 15% in	
	the	the southwestern portion and in the eastern portion by	
5	TWL	a br A cascillent that cuts across the area. Two parcels	Subarea G is adjacent to the UGB but would further extend
	=		Out a parrow branch of the IICB. The area is not close to any
	• A	All parcels are larger than 5 acres.	out a right of the oob. The alea is not close to any existing residential development and does not provide and
	• 80	Botn parcels are split by subarea boundary.	existing restrict that development and does not provide all a would not officiently accommodate residential land needs
	• Adj	Adjacent to UGB.	מסמים ווסר כווומים ווין מכססוווווסמים כי כטומים ומווים ווסרמים,
	• S01	Southern boundary of area is adjacent to Ashwood Rd.	

Subarea	Efficient Urban Development Opportunities	Evaluate of Efficient Accommodation of Residential Land Needs
	 No improved roads within subarea. 14% of land is constrained by steep slopes over 15% and a BPA easement that cuts diagonally across the area. 	therefore it would have a negative impact on Madras' urban form.
Τ	 One parcel. Parcel is larger than 5 acres. Parcel is split by area boundary. Adjacent to UGB. Northern boundary of area is adjacent to E Ashwood Rd. No improved roads within subarea. About 5% of the land is constrained by a BPA easement that runs diagonally across the area. 	Subarea H is adjacent to the UGB and its exchange into the UGB for the area that the City has requested to remove from the UGB and would only connect to the existing UGB towards the north and a bit on the northwest. The area is not close to any existing residential development and would not efficiently accommodate residential land needs. It would have a negative impact on Madras' urban form.
_	 One parcel. Parcel is larger than 5 acres. Parcel is split by area boundary. Not adjacent to UGB, though area corners nearly touch. E Ashwood Dr runs through the north section of the area. 8% of the land is constrained, primarily by a BPA easement that runs across the northwestern portion. 	Subarea I is not adjacent to the UGB. It if was brought into the UGB, it would create an "island" in the UGB for subarea H. This would have a negative impact on Madras' urban form and would not efficiently accommodate residential land needs.
	 One parcel. Parcel is larger than 5 acres. Parcel is split by area boundary. Adjacent to UGB. Nearby access to SE Yarrow Ave. No improved roads within subarea. About 6% of land is constrained, primarily by a BPA easement that runs across the southern portion. 	Subarea J is adjacent to the UGB and would provide an opportunity for extension of existing neighborhood development, along SE Yarrow Ave, with direction connection via that road. It is surrounded by City zone Planned Residential Development (R3) and fills in an existing gap in the UGB boundary. If brought into the UGB, the Bean Foundation plans to include it in the Yarrow Master Plan as an area for future housing development.
		Bringing this area into the UGB would have a positive impact on Madras' urban form and would efficiently accommodate residential land needs, given the proposal to include the area in the Yarrow Master Plan and the opportunities to connect with city infrastructure (documented in Exhibit 30).

Subarea		Efficient Urban Development Opportunities	Evaluate of Efficient Accommodation of Residential Land Needs
¥	•	One parcel.	Subarea K is about a 2,000-foot distance from the Madras
	•	Parcel is larger than 5 acres.	UGB once the area that the City is requesting to exchange out
	•	Parcel is split by area boundary.	is removed. It if was brought into the UGB, it would create an
	•	Not adjacent to UGB. Area is at least 2,000 feet from	"island" in the UGB for subareas H, J, and the area to be
		the UGB line, sans area that is being sought to	exchanged out. This would have a negative impact on
		exchange out.	Madras urban lorm and would not elliciently accommodate
	•	No nearby road infrastructure. Closest improved road is	residential fand needs.
	•	about 1,300 leet away: No improved roads within subarea.	
	•	2% of land is constrained by steep slopes over 15% in	
	_	eastern portion.	
_	•	Three parcels.	Subarea K is about a 2,100 ft. distance from the Madras
	•	More than 99% of land is in parcels 5 acres or larger.	UGB once the area that the City is requesting to exchange out
	•	All parcels split by area boundary.	is removed. It if was brought into the UGB, it would create an
	•	Westernmost parcel is thin and narrow strip.	"Island" in the UGB for subareas J and M, or H and K. This
	•	Not adjacent to UGB. Area is at least 2,100 feet from	would have a negative impact on Madras' urban form and
		the UGB line, sans area that is being sought to	would not efficiently accommodate residential land needs.
		exchange out.	
	•	No access to local roads. The closest improved road is	
		3,000 feet north to E Ashwood Rd.	
	•	No improved roads within subarea.	
	•	8% of land is constrained by steel slopes over 15% in	
		southwestern portion.	
Σ	•	One parcel.	Subarea M would not be adjacent to the UGB once the area
	•	Parcel is larger than 5 acres.	the City is seeking to have exchanged out is removed, though
	•	Parcel split by area boundary.	corners of both boundaries would be touching diagonally.
	•	Area adjacent to UGB area that City is seeking to	Additionally, the area is not close to any existing residential
		exchange out.	development and would not efficiently accommodate
	•	No access to local roads. The closest improved road is	residential land needs. This subarea is bisected by areas with
		about 2,300 feet out to SE Yarrow Ave.	slopes greater trial 23.%, maning corresive residential development challenging It would have a pegative impact on
	•	No improved roads within subarea.	development chanenging, it would have a negative impact on. Madrae' inhan form
	•	24% of land is constrained by steep slopes over 15%	Madias dibail Idili.
		and a BPA easement.	
Z	•	Two parcels.	Subarea N is about a 1,800 ft. distance from the existing
	•	All parcels are larger than 5 acres.	UGB boundary. If it was brought into the UGB, it would create

Evaluate of Efficient Accommodation of Residential Land Needs	an "island" in the UGB for subarea J and M. This would have a negative impact on Madras' urban form and would not efficiently accommodate residential land needs	-				Subarea 0 is adjacent to the UGB boundary and is adjacent	directly adjacent to SE Grizzly Road and in close proximity to	a roundabout where Grizzly RD, SE J St, and SE Cityview Dr	converge. However the area is not close to any existing residential development and would not provide an	opportunity for the extension of existing neighborhoods. If	or ough, into the Madras Juds, it would have a neutral impact on Madras' urban form.	Subarea P is not adjacent to the UGB, though corners of both	boundaries are touching diagonally. It has a direct local road	connection due to SE Grizzly Rd running across its boundary. If brought into the UGB, it would at best create a "cherry	stem". This would have a negative impact on Madras' urban	_	e lieeus	DI.	Subarea Q is adjacent to the UGB, though it is adjacent to	City-zoned Open Space. The area is not close to any existing residential development and is also significantly constrained	The area is bisected by the 100 Year Floodplain and a	riparian corridor, making much of the subarea into the UGB	disalitable to restacting acverabilient.
Efficient Urban Development Opportunities	Parcels split by area boundary. Not adjacent to UGB. Area is about 1,300 feet distance	 to the existing use boundary. Not adjacent to local roads. The closest improved road 	is about 1,800 feet to the area's west at SE Grizzly Road.	 No improved roads within subarea. 	 14% of land is constrained by steep slopes over 15% and a BPA easement. 	• Four parcels.	 99% of land is in parcels 5 acres of larger. Easternmost parcel split by area houndary 	Adjacent to UGB.	Western side adjacent to SE Grizzly Rd, with potential	 allect connection at no times floundabout. No improved roads within subarea. 	3% of land is constrained by steel slopes over 15% and a BPA easement.	Three parcels.	All parcels are larger than 5 acres.	 Easternmost parcel split by area boundary. Not adjacent to IICR though the areas are directly. 	 Not adjacent to oce, inough the areas are directly diagonal at corner points. 	SE Grizzly Rd cuts across the southern portion of land.	2% of land is constrained by steep slopes over 15%, the	FEMA regulatory floodway and TUU-year floodplains, and the 50-foot Willow Creek riparian corridor.	One parcel.	Parcel is larger than 5 acres. Adjacent to 100.	 Adjacent to SF Graziv Rd at the top half of the eastern 	side and adjacent to McTaggart Rd along the western	side.
Subarea						0						Ь							O				

Subarea		Efficient Urban Development Opportunities	Evaluate of Efficient Accommodation of Residential Land Needs
	•	47% of land is constrained by the FEMA regulatory floodway and 100-year floodplains, and the 50-foot Willow Creek riparian corridor.	If brought into the UGB, it would have a negative impact on Madras' urban form and would not efficiently accommodate residential land needs.
ಜ	• •	Four parcels. 94% of land is in parcels 5 acres or larger.	Subarea R is adjacent to the UGB and would provide an opportunity for the extension of existing neighborhood
	•	Northernmost two parcels are irregular in shape and small in size.	development along Leisek way, of wnich is zoned as Single- Family Residential (R-1). The area is also adjacent to SE
	• •	Southernmost parcel split by area boundary. Adjacent to LIGB.	McTaggart Rd. If brought into the UGB, it would have a positive impact on Madras' urban form and could
	•	Adjacent to SE McTaggart Rd along the eastern side with a potential direct connection to leisek Way on the	accommodate residential land needs.
		western side.	
	•	No improved roads within subarea.	
(•	5% of land is constrained by steep slopes over 15%.	
s	•	One parcel.	Subarea S is not adjacent to the UGB, though corners of both
	•	Parcel is larger than 5 acres.	boundaries are touching diagonally. The closest direct
	•	Not adjacent to UGB, though the areas are directly diagonal at corner points.	confirection to the OCB is unlought the adjacent SE MC raggert. Rd, though this road is about 1,500 ft. from the UGB. The
	•	Adjacent to SE McTaggart Rd along the eastern side.	area is not close to any existing residential development and
	•	No improved roads within subarea.	If brought into the UGB, it would at best create a "cherry"
	•	7% of land is constrained by steep slopes over 15%	steff): Birriging this alea into the use would have a negative impact on Madras' urban form and would not efficiently
		along the eastern side.	accommodate residential land needs.
_	•	Four parcels.	Subarea T is adjacent to the UGB, the area of which is zoned
	•	All parcels are larger than 5 acres.	as Single-Family Residential (R-1). This area would provide an
	•	Adjacent to UGB.	Uppoliumly for the exterision of sparse existing residential
	•	Existing road connections on western side, stemming off	development along SE Steele St.
	•	HOTH SE Steele St and SE Difflick Lit. Free of constraints	
n	•	Two parcels.	Subarea U is adjacent to the UGB and would provide an
	•	97% of land is in parcel 5 acres or larger.	opportunity for the extension of existing neighborhood
	•	Parcel of 1 acre is small and irregularly placed,	development along SW Sunrise St and SW Belmont Ln, the
		Subsumed by the other, larger parcel.	area ot which is zoned as Single-Family Residential (R-1). If brought into the UGB, it would have a positive impact on
	•	Adjacetii to uob.	

Evaluate of Efficient Accommodation of Residential Land Needs	Madras' urban form and may efficiently accommodate residential land needs.
Efficient Urban Development Opportunities	 Potential road connections at SW Sunrise St and SW Belmont Ln. Existing road network within area is unimproved. Free of constraints.
Subarea	

Exhibit 30 summarizes the details of Exhibit 29 to give a high-level summary of the potential of each subarea for efficiency of urban development opportunities. Each subarea is given a rating based on the following:

- Negative: Areas that are not adjacent to the UGB, have few if any connections to existing roads within Madras, have significant development constraints, and/or are not near existing or developing residential neighborhoods
 - Neutral: Areas that are adjacent to the UGB but may not provide connections with existing or developing residential neighborhoods or may not provide connections with existing Madras roads
- Positive: Areas that are adjacent to the UGB, may fill in a "notch" in the UGB, adjacent to existing or developing residential neighborhoods, and/or have connections with existing Madras roads

Exhibit 30, Summary of Efficiency of Urban Development Opportunities (Factor 1)

Summary Negative Not adjacent to UGB, distance from UGB, no connections to existing UGB Neutral Little direct connections with Madras' existing neighborhoods to build on. Neutral Not adjacent to UGB, distance from UGB, no connections with existing or developing neighborhoods E Neutral Adjacent to UGB but would not provide substantial connections with existing or developing neighborhoods F Negative Adjacent to UGB but would not provide substantial connections with existing or developing neighborhoods Not adjacent to UGB but would not provide substantial connections with existing or developing neighborhoods Not adjacent to UGB but would not provide substantial connections with existing or developing neighborhoods Not adjacent to UGB but would not provide substantial connections with existing or developing neighborhoods Not adjacent to UGB, distance from UGB, no connections to existing UGB Foundation's plans for development of the area. Not adjacent to UGB, distance from UGB, no connections to existing UGB L Negative Not adjacent to UGB, distance from UGB, no connections to existing UGB Not adjacent to UGB, distance from UGB, no connections to existing UGB Not adjacent to UGB, distance from UGB, no connections to existing UGB Not adjacent to UGB, distance from UGB, no connections to existing UGB Not adjacent to UGB, distance from UGB, no connections to existing UGB Not adjacent to UGB, distance from UGB, no connections to existing UGB	Subarea	High Level	Key Issues or Opportunities
Negative Neutral Negative		Summary	
Negative	A	Negative	Not adjacent to UGB, distance from UGB, no connections to existing UGB
Negative Neutral Negative	В	Neutral	Little direct connections with Madras' existing neighborhoods to build on.
Neutral Negative Negative Negative Positive Negative Negative Negative Negative Negative Negative	S	Negative	Not adjacent to UGB, distance from UGB, no connections to existing UGB
Negative Negative Negative Negative Positive Negative Negative Negative Negative Negative	D	Neutral	Adjacent to UGB but would not provide substantial connections with existing or developing neighborhoods
Negative Negative Negative Positive Negative Negative Negative Negative Negative	Ш	Neutral	Adjacent to UGB but would not provide substantial connections with existing or developing neighborhoods
Negative Negative Negative Positive Negative Negative Negative Negative	Ł		Not adjacent to UGB, distance from UGB, no connections to existing UGB
VVe VVe VVe VVe VVe	Ŋ		Adjacent to UGB but would not provide substantial connections with existing or developing neighborhoods
ve We We	I		Adjacent to UGB but would not provide substantial connections with existing or developing neighborhoods
ve ive ive	_		Not adjacent to UGB, distance from UGB, no connections to existing UGB
ive ive	7		Adjacent to the UGB, adjacent to and an extension of the Yarrow residential development, with the Bean
ive ive			Foundation's plans for development of the area.
ive ive ive	¥		Not adjacent to UGB, distance from UGB, no connections to existing UGB
ive	7		Not adjacent to UGB, distance from UGB, no connections to existing UGB
ive	Σ		Not adjacent to UGB, distance from UGB, no connections to existing UGB
	Z		Not adjacent to UGB, distance from UGB, no connections to existing UGB

Key Issues or Opportunities	Adjacent to the UGB but distant from existing or upcoming development	Not adjacent to UGB, distance from UGB, no connections to existing UGB	Adjacent to the UGB but bisected by floodplain and riparian corridor	Adjacent to the UGB and existing R-1 development, with connections to Madras roads	Not adjacent to UGB, distance from UGB, no connections to existing UGB	Adjacent to the UGB but limited nearby residential development, some connections with Madras roads	Adjacent to the UGB and existing R-1 development, with connections to Madras roads
High Level Summary	Neutral	Negative	Negative	Positive	Negative	Neutral	Positive
Subarea	0	Ь	O	2	S	_	Π

Factor 1 Finding

The City finds that subarea J provides the best opportunities for development at planned densities and also provides opportunities to connect to an existing R-3 zoned neighborhood.

Subareas R and U provide opportunities for development at planned densities but are adjacent to existing R-1 development.

{10340316-01644291;1} Madras UGB Land Swap Findings ECONorthwest

Factor 2: Orderly and economic provision of public facilities and services

focuses on provision of roads, water, and wastewater services and evaluates the advantages and disadvantages for each subarea for Factor 2 requires the City to consider opportunities for orderly and economic provision of public facilities and services. This section these services.

Subarea	Subarea Roads	Municipal Water	Sanitary Sewer and Wastewater Services
4	Advantages Relatively flat, without steep slopes Disadvantages No existing roads in the subarea. ODOT not likely to grant access for local streets to connect Hwy 97. Only collector streets. Access to the subarea would require access through subarea B, creating a cherry stem to the area.	Advantages • Deschutes Valley Water District (DVWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer would need to construct needed water service distribution system, increasing development costs	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. Disadvantages • No existing sewer collection system adjacent or in Subarea. • Requires extension of sewer main from Hwy 97 and Loucks Road to Subarea, about a 1,300 ft. distance. • Developer to pay for "to and through" sewer extension, which may result in higher cost than can be accommodated by the developer, making the development financial infeasible.
ω	Advantages • Subarea directly adjacent to existing Loucks Road. Disadvantages • Eastern & western portion of Subarea are separated by narrower portion of Subarea in the middle, creating an area that is more difficult for new roads. • Extending roads "to and through" will be challenging and limit development, which may result in	Advantages • Deschutes Valley Water District (DVWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system.	Advantages Subarea not developed and wastewater collection system can be developed to serve development most efficiently. Existing sewer main adjacent to southwest corner of Subarea. Disadvantages Requires significant extension of sewer main from Loucks Road to Subarea. Likely requires sewer main to be extended to the east to serve eastern portion of Subarea.

{10340316-01644291;1} Madras UGB Land Swap Findings ECONorthwest

Sanitary Sewer and Wastewater Services	 Developer to pay for "to and through" significant sewer extension, which may result in higher cost than can be accommodated by the developer, making the development financial infeasible. 	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. Disadvantages • Requires significant extension of sewer main from Loucks Road to Subarea. • Developer to pay for "to and through sewer extension, which may result in higher cost than can be accommodated by the developer, making the development financial infeasible.	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. Disadvantages • Requires significant extension of sewer main from Loucks Road, then south in Bean Drive to Subarea. • Developer to pay for "to and through" significant sewer extension, which may result in higher cost than can be accommodated by the developer, making the development financial infeasible.
Municipal Water		Advantages • Deschutes Valley Water District (DVWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system.	Advantages Deschutes Valley Water District (DVWD) is service provider. Disadvantages No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. Developer to construct needed water service distribution system.
Roads	higher cost than can be accommodated by the developer, making the development financial infeasible.	Advantages • Street network not established Disadvantages • Very little transportation planning completed in Subarea. • Access to the subarea would require access through subarea D, creating a cherry stem to the area. • Active irrigation canal on Subarea will need to be avoided when developed or developer to pay for piping.	Advantages • Street network not established • Existing north/south road bisects Subarea. Disadvantages • Street network not established • Roundabout planned at realigned Bean Drive and Loucks Road, which would require private property dedication to the right-of-way, limiting amount of land for development and increasing the costs of the roundabout. • Underground federal irrigation pipe bisects Subarea. • Significant slope separates east and west areas of Subarea.
Subarea		O	Ω

Subarea	Roads	Municipal Water	Sanitary Sewer and Wastewater Services
	 Subarea has significant frontage to Bean Drive and Loucks Road for which will need to be improved at time of development. Frontage and internal street network to be constructed by developer. 		
ш	Advantages Street network not established Disadvantages Street network not established. Very little frontage/access to existing roads. Significant slope on eastern portion of Subarea limits development potential.	Advantages • Deschutes Valley Water District (DWVD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system.	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. Disadvantages • Requires very significant extension of sewer main from Loucks Road, then south in Bean Drive to Subarea. • Developer to pay for "to and through" significant sewer extension, which may result in higher cost than can be accommodated by the developer, making the development financial infeasible.
L	Advantages Existing rural street network established in Subarea. Disadvantages Access to the subarea would require access through Subareas D and or E. Any significant development would require Loucks Road improvements (off-site). Existing rural street network in Subarea not likely to support urban development and needed street network. Significant slopes in subarea would increases the costs of roads.	Advantages • Deschutes Valley Water District (DWVD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system. • Significant slopes in subarea would increases the costs of municipal water.	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. Disadvantages • Requires very significant extension or Ashwood Bean Drive to Subarea. • Developer to pay for "to and through sewer extension, , which may result in higher cost than can be accommodated by the developer, making the development financial infeasible • Development dependent on sewer being extended to serve Subareas E or G.

Sanitary Sewer and Wastewater Services	 Significant slopes in subarea would increases the costs of wastewater service. 	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. • Likely can connect to Ashwood gravity main. Disadvantages • Steep slopes will make serving property challenging. • Development likely dependent on sewer being extended to serve Subarea H. • Developer to pay for "to and through sewer extension, which may result in higher cost than can be accommodated by the developmer, making the development financial infeasible	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. • There is an existing master plan to guide sewer system development. Disadvantages • Sewer service dependent on a costly sewer lift station planned near the northern boundary between Subareas H and I in Ashwood Road, which may take a decade or longer to build. • Gravity sewer service dependent on sewer being extended from development to the west and slopes that are conducive to gravity service.
Municipal Water		Advantages • Deschutes Valley Water District (DVWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system.	Advantages • Deschutes Valley Water District (DVWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system.
Roads	No existing street network.	Advantages • Ashwood Rd. fronts Subarea. Disadvantages • Existing land in UGB to the west of Subarea is not developed. • Significant slopes in subarea. The slopes in the subarea will make it more costly to extend Ashwood Road into the subarea (or build other connector roads). • No existing street network.	Advantages • Subarea has gentle southeast to northwest slope. • Few development constraints other than infrastructure not being adjacent to Subarea. Disadvantages • Existing land in UGB to the west of the Subarea has no existing infrastructure or existing development. • No existing street network.
Subarea		9	工

Sanitary Sewer and Wastewater Services	 Significant "to and through" sewer extension required, , which may result in higher cost than can be accommodated by the developer, making the development financial infeasible 	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. • Master Plan to guide sewer system development. Disadvantages • Sewer service dependent on sewer lift station planned near the northern boundary between Subareas H and I in Ashwood Road. • Gravity sewer service not likely to be feasible and the area would require expensive pump station.	Advantages • Subarea not developed and wastewater collection system can be developed most efficiently based on existing sewer infrastructure in the nearby Yarrow development. • Master Plan to guide sewer system development, with nearby planned sewer lines. • Gravity sewer service to be minimally extended from Yarrow/Bean Drive intersection to serve Subarea.
Municipal Water		Advantages • Deschutes Valley Water District (DVWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system.	Advantages Deschutes Valley Water District (DVWD) is service provider. Opportunity to connect to the DVWD the nearby water main on Yarrow Avenue. Disadvantages DVWD does not have any planned water distribution projects planned in Subarea. Developer to construct needed water service distribution system.
Roads		Advantages Advantages Existing land in UGB to the west of Subarea is not developed. Access to the subarea would require access through Subareas H and new street network to connect to Ashwood Road, creating a cherry stem to the area. Subarea has gentle southeast to northwest slope. Access to Subarea will occur through two connections to Ashwood Road on west side of Subarea and on east outside of Subarea and on east outside of Subarea.	Advantages • Yarrow Avenue terminates at western boundary of Subarea. • Can extend infrastructure into Subarea from western boundary of the Subarea. • Potential for integration with road network developed in existing neighborhood. • Subarea has gentle southeast to northwest slope.
Subarea		_	

Sanitary Sewer and Wastewater Services	 Subarea not developed and wastewater collection system can be developed to serve development most efficiently. Master Plan to guide sewer system development. Significant "to and through" sewer extension required, which may result in higher cost than can be accommodated by the developer, making the development financial infeasible. 	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. • Master Plan to guide sewer system development. Disadvantages • Sewer service dependent on sewer lift station planned near the northern boundary between Subareas H and I in Ashwood Road, about a 2,500 ft. distance. • Sewer service dependent on gravity mains being extended from Subarea I to Subarea K.	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. • Master Plan to guide sewer system development. Disadvantages • Sewer service dependent on sewer lift station planned near the northern boundary between Subareas H and I in
Municipal Water		Advantages • Deschutes Valley Water District (DVWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system.	Advantages • Deschutes Valley Water District (DVWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system.
Roads	The City's TSP includes plans for an extension to Bean Drive, which can serve the western portion of the Subarea. Disadvantages New street network needs to connect to existing Yarrow subdivision street network.	Advantages • Subarea has gentle southeast to northwest slope. • No existing street network. Disadvantages • Access to the subarea would require access through Subareas J and H, creating a cherry stem to the area. • No existing street network.	Advantages • Subarea mostly has gentle southeast to northwest slope. Disadvantages • Access to the subarea would require access through Subareas K and M, creating a cherry stem to the area.
Subarea			7

Subarea	Roads	Municipal Water	Sanitary Sewer and Wastewater Services
			Ashwood Road, about a 4,000 ft. distance. • Sewer service dependent on gravity mains being extended from Subarea I and K to Subarea L.
Σ	Advantages • Significant slopes on at least 40% of Subarea. • No existing street network. Disadvantages • Access to the subarea would require access through Subareas J and O, creating a cherry stem to the area. • Existing land in UGB to the northwest of Subarea is not developed. • No existing street network. • The steep slopes in the subarea would increase the costs of new roads substantially.	Advantages • Deschutes Valley Water District (DVWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system. • The steep slopes in the subarea would increase the costs of connecting to the municipal water system.	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. • Master Plan to guide sewer system development. Disadvantages • Sewer service dependent on sewer service being extended to and through Subarea J, about a 2,700 ft. distance. • Significant "to and through" sewer extension required, which may result in higher cost than can be accommodated by the developer, making the development financial infeasible. • The steep slopes in the subarea would increase the costs of connecting to the municipal wastewater system.
Z	Advantages • Significant slopes on at least 50% of Subarea. • No existing street network. Disadvantages • Access to the subarea would require access through Subareas O and M, creating a cherry stem to the area. • Existing land in UGB to the northwest of Subarea is not developed. • No existing street network.	Advantages • Deschutes Valley Water District (DWWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system.	 Advantages Subarea not developed and wastewater collection system can be developed to serve development most efficiently. Master Plan to guide sewer system development. Disadvantages Sewer service dependent on sewer service being extended to and through Subareas J, M, O, or P. Significant "to and through" sewer extension required, which may result in higher cost than can be accommodated

Subarea	Roads	Municipal Water	Sanitary Sewer and Wastewater Services
			by the developer, making the development financial infeasible.
0	Advantages • Subarea fronts Grizzly Road. • No existing street network. Disadvantages • Moderate westerly slope in Subarea but eastern portion of Subarea has more significant slopes. • Would require street network to be connect to Yarrow Master Plan and subdivision street networks. • Existing land in UGB to the north is not developed.	Advantages • Deschutes Valley Water District (DVWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system.	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. • Development likely to connect into existing sewer main in Yarrow Avenue Disadvantages • Subarea outside of Yarrow Master Plan area and therefore collection system serving development does not exist. • Significant "to and through" sewer extension required, which may result in higher cost than can be accommodated by the developer, making the development financial infeasible.
۵.	Advantages • Subarea fronts Grizzly Road. • No existing street network. Disadvantages • Existing land in UGB to the north and northwest are not developed. • No existing street network. • Access to the subarea would require access through Subareas O or Q, creating a cherry stem to the area.	Advantages • Deschutes Valley Water District (DVWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system.	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. Disadvantages • Sewer main serving development to connect to Yarrow Avenue sewer main. • Significant "to and through" sewer extension required, which may result in higher cost than can be accommodated by the developer, making the development financial infeasible.
O	Advantages • Subarea fronts both McTaggart and Grizzly Roads. Disadvantages	Advantages • Deschutes Valley Water District (DVWD) is service provider. Disadvantages	 Advantages Subarea not developed and wastewater collection system can be developed to serve development most efficiently.

Subarea	Roads	Municipal Water	Sanitary Sewer and Wastewater Services
	Street network to connect to both McTaggart and Grizzly Roads while crossing Willow Creek and the associated floodplain in several locations. Higher costs for the frontages on these streets.	No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. Developer to construct needed water service distribution system. The floodplain for Little Creek creates a disadvantage for municipal water, as it would require a costly crossing of the Creek.	Sewer to connect to J Street sewer main near McTaggart/J Street intersection. Requires significant sewer extension. May require City to grant easement to extend sewer across City McTaggart farm property. The floodplain for Little Creek creates a disadvantage for municipal water, as it would require a costly crossing of the Creek.
	 Advantages Subarea fronts McTaggart Road. Disadvantages Existing developments west of Subarea that are in the city limits are not able to connect/extend streets into Subarea. Higher costs of upgrading McTaggart Road from a County to a city road. Significant slopes on 30% of Subarea. 	Advantages • Deschutes Valley Water District (DWWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system.	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. Disadvantages • Sewer to connect to J Street sewer main near McTaggart/J Street intersection.
	Advantages Gentle southeast slope. Subarea fronts McTaggart Road. No existing street network. Disadvantages Street network to connect to street networks in Subareas R and T that do not exist today. Access to the subarea would require access through Subareas R or T, creating a cherry stem to the area. No existing street network.	Advantages • Deschutes Valley Water District (DWWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system.	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. Disadvantages • Sewer to connect to J Street sewer main near McTaggart/J Street intersection. Requires significant sewer extension. • Sewer service dependent on sewer service being extended to and through Subareas O or R.

Sanitary Sewer and Wastewater Services	Advantages • Subarea not developed and wastewater collection system can be developed to serve development most efficiently. Disadvantages • Sewer service dependent upon sewer being extended to and through the property in the city limits directly to the north of the Subarea or to and through Subarea R or S. • Extension of the needed sanitary sewer system would be 1,300 feet or more.	Advantages Subarea not developed and wastewater collection system can be developed to serve development most efficiently. Disadvantages Sewer service dependent upon sewer being extended to and through the property in the city limits directly to the south. Might require increase sewer capacity for the southwest part of the city beyond existing collection system.
Municipal Water	Advantages Deschutes Valley Water District (DVWD) is service provider. Disadvantages No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. Developer to construct needed water service distribution system, likely by 1,300 feet or more.	Advantages • Deschutes Valley Water District (DVWD) is service provider. Disadvantages • No existing municipal water infrastructure and DVWD does not have any planned water distribution projects planned in Subarea. • Developer to construct needed water service distribution system.
Roads	Advantages No existing street network. Disadvantages Existing land in UGB to the north is not developed. No existing street network. Tuture street network to connect to existing roads to the west and north.	 Advantages No existing street network. Disadvantages Significant southeasterly slope on at least 40% of Subarea. No existing street network. Future street network to connect to development in city limits to the south and east of Subarea. Both are largely undeveloped. Development to would need to pay some of the costs of a to Belmont/Culver Hwy Roundabout
Subarea	F	n

Exhibit 32 shows the relative costs for infrastructure development in each subarea depending on whether there are opportunities to connect to existing infrastructure or need to develop new infrastructure.

- Low cost is a subarea where there is existing adjacent infrastructure to connect into.
- Middle costs are where there is not existing adjacent infrastructure to connect into but there may be some physical constraint such as slopes that raise the costs of infrastructure development.
- High cost is a subarea where there is not existing adjacent infrastructure, infrastructure extension would be at least ¼ mile, and infrastructure improvements may require costly investments like roundabouts or lift stations. There may be some physical constraint such as slopes that raise the costs of infrastructure development.

Exhibit 32. Relative Costs of Infrastructure Development

Subarea	Roads	Municipal Water	Sanitary Sewer and
			Wastewater Services
Α	High	High	High
В	Middle	Middle	Middle
С	High	High	High
D	High	High	High
Ε	High	High	High
F	High	High	High
G	High	High	Low
Н	Low	Middle	Middle
I	High	High	High
J	Low	Low	Low
K	High	High	High
L	High	High	High
M	High	High	High
N	High	High	High
0	Middle	Middle	Middle
Р	High	High	High
Q	High	High	High
R	Middle	High	High
S	High	High	High
T	High	High	High
U	High	High	High

Factor 2 Finding

The City finds that subarea J would provide the best opportunities for using existing connections to public services and is the most economical (least costly) location for Madras' UGB land swap when considering provisions for roads, water, and wastewater services.

Factor 3: Comparative environmental, energy, economic and social consequences

Environmental consequences

Environmental consequences of residential development will be lesser on subareas adjacent to the UGB, where there is existing and developing residential neighborhoods, especially in areas outside of the floodplain, riparian areas, or other environmentally sensitive areas.

The areas that are adjacent to the Madras UGB on at least two sides are B, E, H, J, O, R, and U. Of these, subareas B, R, and U have active agricultural activity on the subareas. Areas E, H, J, and O are the areas that are likely to have lower environmental consequences for urbanization.

Subarea J will be part of the Yarrow Master Plan, which envisions planting street trees and inclusion of parks and open space within the Master Plan area.

Energy consequences

Environmental consequences of residential development will be lesser on subareas adjacent to the UGB, where there is existing and developing residential neighborhoods and infrastructure. Subareas that could connect into existing roads, water systems, and wastewater would have lower comparative energy consequences. Subarea J is best positioned to connect into existing road systems, water system, and wastewater system. The location of subarea J relative to the Yarrow Master Plan area (which is one of Madras growth areas) is positioned to require less travel and energy consumed by mechanical and pumping for water or wastewater services), compared with locating residences in areas that are further from City services. In addition, the planned city park and school near the Yarrow Master Plan provide opportunities to access some services relatively near subarea J.

Economic consequences

The economic consequences of expanding the UGB for residential uses to subarea J are positive. The areas will provide opportunity for additional housing construction, which will support the construction industry. Moreover, providing adequate housing in diverse housing types in Madras supports the City's housing policies. Subarea J is less costly to provide public services (as discussed in Exhibit 32).

Subarea J will be part of the Yarrow Master Plan, which will provide an extension of a developing neighborhood, with a mixture of lot and unit sizes, as well as potential future commercial uses. The Yarrow Master Plan envisions development of housing affordable across the income spectrum, including comparatively affordable types, such as small and medium lots, as well as multifamily housing.

Social consequences

The land exchange will provide opportunities for building a wider variety of housing types. Adding new households to the community will have positive social benefits, such as supporting

community activities and local businesses. Such impacts would presumably occur regardless of the location of new residential land, however, the proximity of subarea J relative to existing uses provides a higher level of social benefit, as part of the Yarrow Master Plan area. Subarea J provides more positive social consequences because of its planned connections with existing residential areas and positive impact on the urban form and a better connected transportation system in Madras (as discussed under Factor 2).

Factor 3 Findings

The City finds that subarea J has positive social consequences (including development as part of the Yarrow Master Plan with a range of housing types), better opportunities for energy efficiency (in connecting to existing transportation, water, and wastewater systems), positive economic consequences (from being relatively cost efficient and providing housing types that may be affordable), and lower likely environmental impacts.

Factor 4: Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the urban growth boundary

The following summarizes the compatibility of the proposed residential land exchange with nearby agricultural and forecast activities around each subarea.

- Subarea A is being used for carrot seed farming and portions of Subarea B are in active farm use for hay, wheat, and carrot seed. To the north of Subarea A across Highway 97, the primary use of the farmland is fallow/idle and shrubland, though alfalfa is also being grown. The proposed residential uses would not be compatible with on-going agricultural uses in Subarea B or in Subarea A. The proposed residential uses would be compatible with fallow and shrubland agricultural uses to the north of Subarea A.
- Subarea B is adjacent to the City. Two-thirds of this area is in active farm use primarily growing winter wheat, as well as hay and carrot seed. The proposed residential uses would not be compatible with on-going agricultural uses in Subarea B. But would be compatible with adjacent agricultural uses in Subarea A.
- Subarea C is primarily shrubland, with some agricultural uses on the western side for alfalfa and non-alfalfa hay. The surrounding area to the east is primarily shrubland. The proposed residential uses would preclude rangeland use where the development occurs but would be a compatible adjacent on-going use in the subarea that would not brought into the UGB and adjacent subareas.
- Subarea D is primarily shrubland with some agricultural uses on the eastern side for dryland and winter wheat when irrigation water is available. The surrounding area to the east is primarily shrubland. The proposed residential uses would preclude rangeland use where the development occurs but would be a compatible adjacent ongoing use in the subarea that would not brought into the UGB and adjacent subareas.
- Subarea E is primarily used as range land. The area to the east of Subarea E, Subarea F, mostly contains shrubland. The proposed residential uses would preclude rangeland

use where the development occurs but would be a compatible adjacent on-going use in the subarea that would not brought into the UGB and adjacent subareas.

- Subarea F is primarily used as range land. The area to the east of Subarea F mostly contains shrubland. The proposed residential uses would preclude rangeland use where the development occurs but would be a compatible adjacent on-going use in the subarea that would not brought into the UGB and adjacent subareas.
- Subarea G is primarily used as range land. The area to the east of Subarea F mostly contains shrubland. The proposed residential uses would preclude rangeland use where the development occurs but would be a compatible adjacent on-going use in the subarea that would not brought into the UGB and adjacent subareas.
- Subarea H is primarily shrubland, with a small portion being use for rangeland. The
 proposed residential uses would preclude rangeland use where the development occurs
 but would be a compatible adjacent on-going use in the subarea that would not brought
 into the UGB and adjacent subareas.
- Subarea I is primarily used as range land. The area to the east of Subarea I mostly contains shrubland. The proposed residential uses would preclude rangeland use where the development occurs but would be a compatible adjacent on-going use in the subarea that would not brought into the UGB and adjacent subareas.
- Subarea J is primarily shrubland. The proposed residential uses would preclude rangeland use where the development occurs but would be a compatible adjacent ongoing use in the subarea that would not brought into the UGB and adjacent subareas.
- Subarea K is primarily used as range land. The area to the east of Subarea K mostly
 contains shrubland. The proposed residential uses would preclude rangeland use where
 the development occurs but would be a compatible adjacent on-going use in the subarea
 that would not brought into the UGB and adjacent subareas.
- Subarea L is primarily used as range land. The proposed residential uses would
 preclude rangeland use where the development occurs but would be a compatible
 adjacent on-going use in the subarea that would not brought into the UGB and adjacent
 subareas.
- Subarea M is primarily used as range land. The proposed residential uses would
 preclude rangeland use where the development occurs but would be a compatible
 adjacent on-going use in areas of Subarea M not brought into the UGB.
- Subarea N is primarily used as range land. The area to the east of Subarea N mostly
 contains shrubland. The proposed residential uses would preclude rangeland use where
 the development occurs but would be a compatible adjacent on-going use in the subarea
 that would not brought into the UGB and adjacent subareas.
- Subarea O is primarily used as range land. The proposed residential uses would preclude rangeland use where the development occurs but would be a compatible

adjacent on-going use in the subarea that would not brought into the UGB and adjacent subareas.

- Subarea P is primarily used as range land. The proposed residential uses would
 preclude rangeland use where the development occurs but would be a compatible
 adjacent on-going use in the subarea that would not brought into the UGB and adjacent
 subareas.
- Subarea Q is being actively used for agricultural using wastewater from the City's south wastewater treatment plant. The area is primarily used to grow alfalfa, as well as carrot seed. Land to the south of Subarea Q is also used for the growth of alfalfa. The proposed residential uses would preclude agricultural uses where the development occurs but would be a compatible adjacent on-going use in the subarea that would not brought into the UGB and adjacent subareas.
- Subarea R its land is used for the growth of alfalfa and hay, though much of the area is shrubland. The proposed residential uses would preclude agricultural uses where the development occurs but would be a compatible adjacent on-going use in the subarea that would not brought into the UGB and adjacent subareas.
- Subarea S is primarily used as range land. The proposed residential uses would
 preclude rangeland uses where the development occurs but would be a compatible
 adjacent on-going use in the subarea that would not brought into the UGB and adjacent
 subareas.
- Subarea T has some small scale agriculture, particularly in the northern portion that lays directly adjacent to the City. This agricultural use involves the growth of wheat and alfalfa, as well as some rangeland. The proposed residential uses would preclude agricultural and rangeland uses where the development occurs but would be a compatible adjacent on-going use in the subarea that would not brought into the UGB and adjacent subareas.
- Subarea U is partially being used for farming wheat and alfalfa, as well as rangeland. To the west and north of Subarea W up to SW Johnson Rd, the primary use of the farmland is shrubland. The proposed residential uses would preclude agricultural and rangeland uses where the development occurs but would be a compatible adjacent on-going use in the subarea that would not brought into the UGB and adjacent subareas.

Much of the area around the subareas is in on-going agricultural uses, either through growing crops or in rangeland. Exhibit 33 summarizes the details of the discussion above about compatibility between the proposed urban use (residential development in the R-3 zone) and agricultural uses in adjacent areas. Each subarea is given a rating based on the following:

- Negative: Areas that are not adjacent to the UGB and would extend urban uses further from the existing UGB into areas with agricultural uses.
- Neutral: Areas that are adjacent to the UGB, where new residential uses would be compatible with on-going agricultural uses outside the UGB.

Exhibit 33. Evaluation of Compatibility of Proposed Urban Use with Agricultural Uses

Subarea	Summary of Potential Impact on Agricultural Uses	Key Considerations
А	Negative	Area not adjacent to the UGB
В	Neutral	Adjacent to the UGB, residential development would be compatible with agricultural activity outside the subarea
С	Negative	Area not adjacent to the UGB
D	Neutral	Adjacent to the UGB, residential development would be compatible with agricultural activity outside the subarea
E	Neutral	Adjacent to the UGB, residential development would be compatible with agricultural activity outside the subarea
F	Negative	Area not adjacent to the UGB
G	Neutral	Adjacent to the UGB, residential development would be compatible with agricultural activity
Н	Neutral	Adjacent to the UGB, residential development would be compatible with agricultural activity outside the subarea
	Negative	Area not adjacent to the UGB
J	Neutral	Adjacent to the UGB, residential development would be compatible with agricultural activity outside the subarea
K	Negative	Area not adjacent to the UGB
L	Negative	Area not adjacent to the UGB
M	Negative	Area not adjacent to the UGB
N	Negative	Area not adjacent to the UGB
0	Neutral	Adjacent to the UGB, residential development would be compatible with agricultural activity outside the subarea
Р	Negative	Area not adjacent to the UGB
Q	Neutral	Adjacent to the UGB, residential development would be compatible with agricultural activity outside the subarea
R	Neutral	Adjacent to the UGB, residential development would be compatible with agricultural activity outside the subarea
S T	Negative	Area not adjacent to the UGB
T	Neutral	Adjacent to the UGB, residential development would be compatible with agricultural activity outside the subarea
U	Neutral	Adjacent to the UGB, residential development would be compatible with agricultural activity outside the subarea

Factor 4 Findings

The City finds that the subareas where there is little on-going agriculture (beyond grazing animals) in the subarea, the subareas are adjacent to the UGB on at least one side, and there is less intensive active agricultural activity in adjacent areas are subareas: D, E, H, J, and O. Development in these subareas would have a lesser effect on agricultural activities on the subareas and in adjacent subareas.

Goal 14 Factor Evaluation Summary

Exhibit 34 summarizes the evaluation of Goal 14 Locational Factors 1, 2, and 4. Based on the analysis findings presented above, Subarea J is the best alternative for Madras to meet the land need for about 40 acres of buildable residential land. It would have a positive impact on Madras' urban form and would efficiency accommodate the land need for R-3 residential land, as an area for expansion of the Yarrow Master Plan. It is the area with the lowest cost of service for roads, water, and wastewater. Subarea J has potential for positive social, economic, and energy consequences. Its location adjacent to the UGB, with little agricultural activity on subarea J or around it, beyond rangeland uses, will be compatible with agricultural activities.

Exhibit 34. Summary of Evaluation of Goal 14 Locational Criteria Factors 1, 2, and 4

Subarea	Factor 1: Impact on Efficiency	Factor 2: Costs of Service	Factor 4: Potential Impact on Agricultural Uses
Α	Negative	High	Negative
В	Neutral	Middle	Neutral
С	Negative	High	Negative
D	Neutral	High	Neutral
E	Neutral	High	Neutral
F	Negative	High	Negative
G	Negative	High	Neutral
Н	Negative	Middle	Neutral
I	Negative	High	Negative
J	Positive	Low	Neutral
K	Negative	High	Negative
L	Negative	High	Negative
M	Negative	High	Negative
N	Negative	High	Negative
0	Neutral	Middle	Neutral
Р	Negative	High	Negative
Q	Negative	High	Neutral
R	Positive	Middle	Neutral
S	Negative	High	Negative
T	Neutral	High	Neutral
U	Positive	High	Neutral

The City finds that subarea J provides the best alternative for Madras to meet the residential land needs.

5. County and City Requirements for UGB Changes

Jefferson County Comprehensive Plan

Quasi-Judicial Amendments

In order to be approved, the proposed amendment must:

 Comply with applicable Statewide Planning Goals, Oregon Revised Statutes and Administrative Rules, or comply with requirements for an exception to the goal(s);

Finding: Compliance with Statewide Planning Goals is demonstrated in Section 6 of this Narrative. Compliance with applicable Oregon Revised Statutes and Administrative Rules is demonstrated in Section of this Narrative.

2. Comply with all applicable Comprehensive Plan goals and policies; and

Goal 1

Policy 1: Strive to maximize citizen involvement during the review and amendment of the Comprehensive Plan and implementing ordinances.

Finding: The proposed UGB land exchange was presented and discussed at public hearings of the Madras Planning Commission (1/3/2024), Madras City Council (2/13/2024), Jefferson County Planning Commission (2/8/2024), and Jefferson County Board of County Commissioners (2/28/2024). Public testimony was taken at each hearing. This criterion is met.

Policy 2: Provide maximum opportunity for citizen participation in the land use permitting process.

Finding: The proposed UGB land exchange was presented and discussed at public hearings of the Madras Planning Commission (1/3/2024), Madras City Council (2/13/2024), Jefferson County Planning Commission (2/8/2024), and Jefferson County Board of County Commissioners (2/28/2024). Public testimony was taken at each hearing. This criterion is met.

Policy 3: Information on planning processes, procedures and requirements should be readily available to the public.

Finding: Information about the proposed UGB land exchange was made available to the public at hearings of the Madras Planning Commission and Madras City Council, as well as hearings of the Jefferson County Planning Commission and Jefferson County Board of County Commissioners (. This criterion is met.

Goal 3 Agricultural Lands

Policy 1: Protect agricultural and range land which presently is under production, or has the potential to be productive.

Finding: The area proposed to be brought into the UGB (subarea J) is within Madras' Urban Reserve and is "First Priority" for inclusion into the UGB according to OAR 197A.320. This criterion is met. The land removed from the UGB will be zoned Rangeland, consistent with the zoning of surrounding areas. The agricultural potential of the exchange parcels is comparable as they are comprised of similar soils. If anything, the "squaring off" that would occur as a result of the exchange would result in more contiguous agricultural lands, which would be employed more efficiently with reduced conflicts with the residential uses contemplated in the inclusion lands. This criterion is met.

Finding: The land removed from the UGB will be zoned Rangeland, consistent with the zoning of surrounding areas. This criterion is met.

Policy 2: Recognize the importance of irrigation for crop production.

Finding: The area proposed to be brought into the UGB (subarea J), which is not irrigated. This criterion is met.

Goal 10 Housing

Policy 1: Sufficient rural residential land should be provided to meet the need to accommodate population growth and the demand for rural home sites outside city limits.

Finding: The area proposed to be brought into the UGB (subarea J) was not comprehensively planned or zoned for residential use. As a result, the proposed action does not affect supplies of rural residential land. This criterion is met.

Policy 2: Criteria for rezoning lands to Rural Residential should be established.

Finding: A rezone to Rural Residential is not proposed.

Jefferson County Zoning Ordinance

803.2 Map Amendments

An amendment to the Zoning Map may be approved if it complies with the approval criteria in this Section. The burden of proof is on the applicant to submit sufficient information to demonstrate that the application complies with the approval criteria. For instance, a traffic impact study in accordance with Section 421 may be needed to show compliance with criterion (F).

A. The zoning designation will conform to the Comprehensive Plan Map designation;

Finding: The area proposed to be brought into the UGB (subarea J) was in Jefferson County's Rangeland zone. It will be brought into the UGB and zoned Planned Residential

Development (R-3) consistent with proposed Madras Comprehensive Plan Map designation. This criterion is met.

Finding: The land removed from the UGB will be zoned Rangeland, consistent with the Jefferson County Comprehensive Plan Map designation. This criterion is met.

B. The amendment is consistent with other Zoning Ordinance requirements including, but not limited to, wildlife habitat, bird habitat and riparian protection standards;

Finding: Compliance with the Jefferson County Zoning Ordinance is addressed in this section. No physical development of either of the exchange lands is proposed at this time. The exchange lands are not otherwise subject to any Goal 5 inventories. This criterion is met.

C. The amendment will cause no significant adverse impact to other properties in the vicinity due to factors such as water quality, drainage, air quality or noise;

Finding: The proposal does not include any physical development that might potentially create the foregoing impacts. Any future development of the area proposed to be brought into the UGB (subarea J) will be developed consistent the Madras Development Code, which includes development standards that address potential adverse impacts to adjacent properties. The proposal does not present adverse impacts to adjacent County-zoned properties. This criterion is met.

Finding: The proposal does not include any physical development that might potentially create the foregoing impacts. Any future development of the land removed from the UGB will be developed consistent with Jefferson County Zoning Ordinance, which includes development standards that address potential adverse impacts to adjacent properties. This criterion is met.

D. The amendment will not force a significant change in or significantly increase the cost of farming or forest practices on surrounding resource land;

Finding: The area proposed to be brought into the UGB (subarea J) is adjacent to the city's UGB on two sides and will have the area removed from the UGB to the East (which is owned by the City of Madras). The proposed development on subarea J is compatible with surrounding rangeland uses and will not force a significant change in or significantly increase costs of farming on surrounding land. If anything, the proposal will reduce the perimeter of the Madras UGB and thus the extent of the line between urban/urbanizable uses and rural/resource uses (thereby reducing potential conflicts that might result in change or increased costs of resource uses). This criterion is met.

Finding: The land removed from the UGB will be zoned Rangeland and will cause no significant change in or significantly increase costs of farming on surrounding land. If

anything, the proposal will reduce the perimeter of the Madras UGB and thus the extent of the line between urban/urbanizable uses and rural/resource uses. This criterion is met.

E. Adequate public safety, fire protection, sanitation, water and utility facilities and services are available or will be provided to serve uses allowed in the proposed zone;

Finding: The City of Madras will provide urban services to the area proposed to be brought into the UGB (subarea J), consistent with other land in the Madras UGB. This criterion is met.

Finding: The land removed from the UGB is approximately the same number of acres as subarea J, resulting in no substantial changes to County provision of services. This criterion is met.

- F. The uses allowed in the proposed zone will not significantly affect a transportation facility identified in an adopted Transportation System Plan by:
 - 1. Changing the functional classification of an existing or planned transportation facility;
 - 2. Allowing types or levels of land uses which would result in levels of travel or access which are inconsistent with the functional classification of a transportation facility; or
 - 3. Reducing the performance standards of the facility below the minimum acceptable level identified in the applicable Transportation System Plan. A Traffic Impact Study in accordance with Section 421 may be required to show compliance with this standard.

Finding: The area proposed to be brought into the UGB (subarea J) will be included in Madras TSP. The proposal is supported by a Transportation Planning Rule analysis, as discussed below, that finds none of the foregoing significant effects. This criterion is met.

Finding: The land removed from the UGB will be down zoned to Rangeland and will thus not have any of the foregoing significant effects. This criterion is met.

Madras Comprehensive Plan

<u>GOAL 1</u> - To develop a Citizen Involvement program that insures the opportunity for all citizens to be involved in all phases of the planning process.

POLICY - The City shall insure an adequate citizen involvement in all phases of the planning process. To that end, the citizen involvement program is spelled out on Pages 14 and 15 of this plan.

The City shall publicize the opportunities for citizen involvement by the following methods:

- A. The City shall post notices of Planning Commission meetings, outlining the date, time, place and topics to be discussed, on public bulletin boards within the City. This would include the City Hall, the County Courthouse, and local markets.
- B. In addition to the Oregonian and the Oregon Journal, there are two newspapers serving the area--the Madras Pioneer (a weekly), and The Bulletin (a Bend daily). Both papers have indicated a willingness to publish articles announcing meetings and general discussions of Planning Commission topics including any decisions that are rendered.
- C. Madras has a local television weather channel that allows placement of local notices. This is anticipated to provide an excellent method of notification go the general public.
- D. Local service organizations and clubs shall be informed on Planning Commission progress and discussion topics. These organizations include the Lions, Kiwanis, Chamber of Commerce, Epsilon Sigma Alpha Sorority, and the Jaycees.
- E. Technical assistance shall be provided to the Planning Commission and the general public by a planning consultant retained by the City. In addition, technical assistance is available from the City Manager's office. As Madras is the County Seat of Jefferson County, both the County Planner and the County Extension Agent have indicated a willingness to assist in the planning process and to provide assistance to interested citizens.

Finding: The proposed UGB land exchange was presented and discussed at public hearings of the Madras Planning Commission (1/3/2024), Madras City Council (2/13/2024), Jefferson County Planning Commission (2/8/2024), and Jefferson County Board of County Commissioners (2/28/2024). The City posted notices of the hearings in City Hall, Jefferson Co. Library, Jefferson Co. Annex, the Madras Post Office, and Madras Pioneer Newspaper on the dates identified in Table 1 below. Public testimony was taken at each hearing. This criterion is met.

Table 1. Public Meeting Notices

Hearing	Location	Date Posted	Notes
	City Hall	Dec. 6 th & 13 th , 2023	
	Jefferson Co. Library	Dec. 6 th & 13 th , 2023	
	Jefferson Co. Annex	Dec. 6th & 13th, 2023	
	Madras US Post Office	Dec. 6 th & 13 th , 2023	
	Madras Pioneer	Dec. 6 th & 13 th , 2023	
	Newspaper		

Commented [BG1]: Nick - Fill in?

<u>GOAL 2</u> - To establish a land use planning process and policy framework as a basis for all decisions and actions related to the use of the land and to insure an adequate factual base for such decisions and actions.

POLICIES -

A. The City and County shall insure that the Comprehensive Plan serves as a basis for future land use decision.

Finding: The proposed UGB land exchange documented in this report was developed with consideration of Madras' Comprehensive Plan Policies. This criterion is met.

B. The City and County shall be responsive to the changes in needs and conditions over time and amend the plan accordingly. The amendment process is discussed in the Land Use element.

Finding: The proposed UGB land exchange documented in this report is a needed amendment to the City's Comprehensive Plan, to allow for more efficient utilization of land and more achievable development of needed housing. This criterion is met.

C. The land use plan map and zoning maps for properties within in the Madras Urban Growth Boundary are the same. The City and County will work to adopt common zones for land in the UGB to provide certainty for property owners regarding the intended future urban use for all lands in the boundary.

Finding: The land proposed for inclusion in the UGB documented in this report will be zoned and comprehensively planned as R-3. This criterion is met.

GOAL 3 - To preserve and maintain agricultural lands.

POLICIES -

- A. To establish an Urban Growth Boundary to separate rural lands from urbanizable lands.
- B. Encourage establishment of exclusive farm use zoning outside the established Urban Growth Boundary.

Finding: The land proposed for inclusion in the UGB documented in this report will be zoned R-3, separating rural land from urbanizable land. The proposal decreases the perimeter of the UGB and thus more efficiently separates rural lands from urban/urbanizable lands.

GOAL 10 - To provide for the housing needs of the citizens of the City.

POLICIES - The City shall:

A. Provide buildable land for a variety of housing types. So that a reasonable housing balance can be provided and that a mix of housing types on a variety of lot sizes are available for both

existing and future area residents, the City shall encourage the development of a range of housing types including "middle housing." "Middle housing" is slightly denser than a detached single dwelling surrounded by a yard, but less dense than an apartment building. It can take several forms depending on the neighborhood or district context, including one to four dwelling units on a single lot—attached or detached—townhouses, cottage clusters, tiny homes, stacked flats, garden apartments, and boarding houses. It can occur in infill, redevelopment, conversions, and new subdivisions.

Finding: The proposed UGB land exchange will provide more achievable opportunities for development of a variety of housing types, as part of the Yarrow Master Plan area, including single-family housing (in a range of lot sizes), townhouses, and multifamily housing. This criterion is met.

B. Encourage development of suitable housing to satisfy all income levels. With the addition of more allowable housing types and the removal of barriers to middle housing, more development of attainable housing for low-, moderate- and middle-income residents will be permittable, and the City will grow into a more diverse, vibrant community.

Finding: The proposed UGB land exchange will provide more achievable opportunities for development of a variety of housing types, as part of the Yarrow Master Plan area, including single-family housing (in a range of lot sizes) and multifamily housing. The land being removed from the UGB was planned to be developed predominantly with larger lot single-family housing built around a golf course. The wider variety of housing sizes and types in subarea J will provide more variety in affordability of newly built housing. This criterion is met.

<u>GOAL 11</u> - To plan and develop a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban and rural development.

POLICIES - The City shall:

- A. Continue to support the school district in providing adequate educational facilities.
- B. Provide urban services as required to the urbanizing areas of the City.
- C. Ensure the provision of urban services--streets, water and sewer--as new developments occurs.
- D. The City shall continue coordinating the existing agreement between the City and Deschutes Valley Water District.
- E. The City shall coordinate with ODOT in implementing its improvement program.

Finding: The proposed UGB land exchange (subarea J) is the area that can be most efficiently serviced with City water and wastewater, as well as connecting with Madras roads, as

described in Section 4. The proposal does not detract from the City's coordination efforts with partner agencies.

GOAL 12 - To provide and encourage a safe, convenient, and economical transportation system.

POLICIES - The City shall maintain and improve the City's street network policies. The City shall undertake to resolve the following problems as noted in the inventories section of the Comprehensive Plan.

Finding: The proposed UGB inclusion lands (subarea J) is the area that can be most efficiently connected with Madras roads, as described in Section 4. The exchange lands are not associated with any of the identified transportation problems.

<u>GOAL 14</u> - To provide for an orderly and efficient transition from rural to urban land, and to provide for livable communities.

POLICIES -

- A. The City, in cooperation with Jefferson County, shall establish an Urban Growth Boundary.
- B. The City, in cooperation with Jefferson County, shall mutually agree to a management plan for the Urban Growth Boundary area.
- C. The City, in cooperation with Jefferson County, shall establish an Urban Growth Boundary revision process to be utilized in a proposed change of the Urban Growth Boundary.
- D. The City shall encourage the development of complete, livable communities that include characteristics such as: a variety of lot sizes, dwelling unit types and ownership types, open spaces and other recreational amenities, a mix of land uses, school and community facilities, connected streets, proximity to downtown and other employment centers, and development that is scaled to the pedestrian and creates a sense of place. New growth areas should be developed in accordance with the Master Planned Community Overlay zone, which requires generous open space and amenities, and encourages efficient use of land and public facilities and services, a variety of housing types, innovative designs and complete pedestrian-friendly communities. Physical barriers, such as highways, tend to disrupt complete communities and livability because they disconnect areas from downtown and result in an auto-oriented environment of sprawl along highway corridors.

Finding: The proposed changes to Madras UGB by bringing subarea J into the UGB and removing the land identified in this report from the UGB will be adopted by both Madras and Jefferson County. This criterion is met.

Finding: The proposed UGB land exchange will allow for development of subarea J as a part of the Yarrow Master Plan area. It will include a wider variety of housing than was planned

for the area being removed from help Madras' development as a	n the UGB, with nearby parks and a scl complete and livable community. This	nool. This change will s criterion is met.	
ECONorthwest	Madras UGB Lan ุสเวรมชอด Férathings 291;1}	78	
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Consistency with Madras and Jefferson County Urban Reserve Area Report

The Urban Reserve Area Report was adopted by Madras DETAILS. The report includes the following Goal 14 policies that are relevant to the proposed land exchange:

E. The City, in cooperation with Jefferson County, shall give priority to land in designated urban reserve areas over other land when considering urban growth boundary amendments.

Finding: The area proposed to be brought into the UGB (subarea J) is within Madras' Urban Reserves. This criterion is met.

- F. The City shall favor UGB amendments that involve land in locations that are suitable to address identified urban land needs in order to minimize buildable land supply shortages and address identified needs. Factors that will be considered when evaluating UGB additions include:
 - Existing and planned capacity of the transportation system
 - Existing and planned capacity of the city waste water treatment plant
 - Existing and planned capacity of the city sanitary sewer conveyance system
 - Existing and planned capacity of the Deschutes Valley Water District supply system
 - Impacts on schools, parks, and public safety service providers
 - Impacts on future operating costs for public facilities and services

Finding: Impacts on the these systems were considered in the evaluation of land to bring into the UGB, as documented in Chapter 4, with additional considerations in Chapters 5 and 6. The best area for inclusion in the UGB was determined to be subarea J, as discussed in other sections of this report. The criterion is met.

H. During years when a comprehensive UGB demand and supply evaluation is not scheduled, individual applications for adding property to the UGB shall be limited to requests of less than 50 acres. UGB amendment applications must demonstrate consistency with applicable Oregon statutes and administrative rules and be accompanied by information that addresses Policy 14-J below. Applications that involve more than 25 acres also must comply with provisions of Policy 14-I.

Finding: The proposed UGB land swap is for fewer than 50 acres. Consistency with applicable Oregon Statutes and administrative rules is demonstrated throughout this document. This criterion is met.

Commented [BG2]: Nick - How and when was it adopted?

- 1. The City, in cooperation with Jefferson County, shall encourage the development of complete, livable communities that include characteristics such as: a variety of lot sizes, dwelling unit types and ownership types, open spaces and other recreational amenities, a mix of land uses, school and community facilities, connected streets, proximity to downtown and other employment centers, and development that is scaled to the pedestrian and creates a sense of place. New growth areas added to the UGB should be planned and developed in accordance either with the city Master Planned Community Overlay zone, or an Area Master Plan.
 - 1. A Master Planned Community (MPC) Overlay may apply to large multi- phased development projects where the master plan is intended to guide future development patterns and serves to regulate the site-development approval process. MPC's require generous open space and amenities, and encourage efficient use of land and public facilities and services, a variety of housing types, innovative designs and complete pedestrian-friendly communities. Physical barriers, such as highways, tend to disrupt complete communities and livability because they disconnect areas from downtown and result in an auto-oriented environment of sprawl along highway corridors.
 - 2. An Area Master Plan (AMP) is appropriate for land added to the UGB where the approval of urban development is expected to rely on conventional urban zoning and a conventional development application and review process. An AMP must be prepared for all contiguous properties added to the UGB that are greater than 25 acres and which are not subject to a MPC overlay. An AMP shall encourage efficient use of land, zoning consistent with an identified urban land need, appropriate locations for transportation improvements, public facilities, protection for significant open space, scenic, historic, and natural resource areas. An AMP must show how planned land uses will be integrated with the existing urban development pattern.

Finding: The area proposed for inclusion in the UGB (subarea J) will need to be included in an update of the Yarrow Master Plan, consistent with Madras' development code, before subarea J is developed.

- J. All land use applications or legislative proposals to expand the Madras UGB must be accompanied by information that documents the following:
 - 1. The proposed urban zoning or land use program for the subject properties;
 - 2. An annexation program for subject properties;
 - Evidence that all public facilities required by OAR 660-011-000 can be provided either through planned system improvements outlined in adopted facility master plans or by supplemental improvements that augment adopted infrastructure plans;
 - 4. Evidence that the proposed zoning or land use plan complies with requirements of OAR 660-0012-0060 either by demonstrating that the planned improvements in the Madras

Commented [BG3]: Nick - Do you have anything to add here about when this update is expected and may be adopted.

Transportation System Plan (TSP) have capacity to meet transportation needs of the proposed zoning or land use plan or that supplemental transportation improvements, which augment the adopted TSP, will meet this need;

- 5. Evidence that providers of other public facilities including schools, parks and recreation, energy, health care, etc. are able to meet the projected demand for their services;
- Evidence that development on property constrained by or affected by natural hazards are protecting from such hazards;
- 7. Evidence that known or probable significant resources related to open space, scenic areas, historic places or structures, or fish and wildlife habitat with appropriate measures for protecting significant sites.
- 8. Evidence that a majority of property owners support the conversion of land to urban uses and that land use regulations and financing for development related public improvements are available that ensure the land can be developed as planned within a 20-year horizon.

Finding: The land proposed to be included in the UGB will be simultaneously annexed into the City and assigned R-3 zoning and comprehensive plan designations. Criteria 1 and 2 are met

Finding: Subarea J provides opportunities to connect to a water main near the subarea on Yarrow Avenue and will require minimal extension of sewer service from the Yarrow Avenue and Bean Drive intersection. Extension of these services in this area will be less costly and burdensome than other alternative area considered for the land exchange. Existing fire and police protection will be extended by the City to serve the area. Criterion 3 has been met.

Finding: The transportation analysis presented in Chapter 6 for Goal 12 concludes that the proposed land exchange does not constitute a significant effect, as defined by the TPR, if the lands were developed to their maximum reasonable level under the R-3 zoning. Criterion 4 has been met.

Finding: The City's existing public facility master plans contemplated serving the 39 acres of buildable land proposed to be removed from the UGB. The 40 acres of buildable land to be included represents a nominal increase in potential development and does not exceed capacities to provide urban services to the included lands as documented in submitted will serve letters. Criterion 5 has been met.

Finding: Subarea J is less sloped and otherwise has no other substantial natural hazards, as documented in Chapters 2 and 3 of this analysis. Criterion 6 has been met.

Finding: There are no known or probable significant resources in subarea J. Criterion 7 has been met.

Commented [BG4]: Nick - Is this enough?

Commented [GC5]: Need these per criterion (5) above.

Commented [BG6R5]: Nick?

Finding: The land owners of subarea J and the area proposed for removal from the UGB are City of Madras in both cases. Criterion 8 has been met.

Madras Development Code

18.75.030 Quasi-judicial amendments.

(1) Applicability, Procedure and Authority. Quasi-judicial amendments generally refer to a plan amendment or zone change affecting a single or limited group of properties and that involves the application of existing policy to a specific factual setting. Quasi-judicial amendments shall follow the Type III procedure using the standards of approval in subsection 2 and/or 3 of this section, as applicable. Based on the applicant's ability to satisfy the approval criteria, the application may be approved, approved with conditions, or denied.

Finding: The proposal applies to specific parcels of land and is thus subject to the quasijudicial procedures set out in this section. It is thus subject to quasi-judicial procedures.

- (2) Criteria for Quasi-Judicial Comprehensive Plan Map Amendments. The applicant shall submit a written narrative which explains how the approval criteria will be met. A recommendation or a decision to approve, approve with conditions, or to deny an application for a quasi-judicial amendment shall be based on all of the following criteria:
 - (a) Approval of the request is consistent with the relevant Statewide Planning Goals that are designated by the Community Development Director;
 - (b) Approval of the request is consistent with the relevant policies of the Comprehensive Plan that are designated by the Community Development Director;
 - (c) The property and affected area are presently provided with adequate public facilities, services, and transportation networks to support the use, or such facilities, services and transportation networks are planned to be provided concurrently with the development of the property;
 - (d) Evidence of change in the neighborhood or community or a mistake or inconsistency in the Comprehensive Plan or Zoning Map regarding the property that is the subject of the application; and
 - (e) Approval of the request is consistent with the provisions of the Transportation Planning Rule.

Finding: The relevant statewide planning goals are addressed below. The policies of the Madras Comprehensive Plan were addressed above. The proposal includes modifications to the City's public facilities master plans for the planned provisions of urban services to the lands added to the UGB (and exclusion of the withdrawn lands from such plans). The Transportation Planning Rule is addressed below.

- (3) Criteria for Quasi-Judicial Zone Changes. The applicant must submit a written narrative which explains how the approval criteria will be met. A recommendation or a decision to approve with conditions, or to deny an application for a quasi-judicial zone change must be based on meeting the following criteria:
 - (a) The amendment will bring the Zoning Map into conformance with the Comprehensive Plan map;
 - (b) The property and affected area is presently provided with adequate public facilities, services, and transportation networks to support the use, or such facilities, services and transportation networks are planned to be provided concurrently with the development of the property; and
 - (c) Approval of the request is consistent with the provisions of the Transportation Planning Rule.

Finding: The proposal includes a concurrent redesignation and rezoning of the added lands to R-3, which will achieve conformance in planning and zoning. The proposal does not include modifications to the City's public facilities master plans for the planned provisions of urban services to the lands added to the UGB (and exclusion of the withdrawn lands from such plans). Before development occurs, the applicant will be required to submit a master plan to address need for public facility changes. The Transportation Planning Rule is addressed below.

Madras Urban Reserve Area Management Agreement

The City of Madras and Jefferson County entered into the *Madras Urban Reserve Area Management Agreement'* (URAMA) with the purpose of establishing standards and procedures for land use actions on land in the Madras Urban Reserve Area.

OAR 660-021-0040(2)(e) and the URAMA state that:

The County shall prohibit certain uses in the URA, including plan or zoning map amendments that allow a minimum lot size less than ten acres as outlined in JCZO Section 323.3.

Finding: The land removed from the UGB will be down zoned to Rangeland, consistent with the zoning on subarea J and other adjacent land in the Urban Reserves. Jefferson County's minimum lot size in the RL zone is 160 acres (Jefferson County Zoning Ordinance 301.8). This requirement is met.

OAR 660-021-0050(1) and the URAMA state that:

Jefferson County shall have authority and jurisdictional responsibility for current planning activities, land use decisions, building permitting, and code enforcement within the URA.

¹ The Madras Urban Reserve Area Management Agreement was adopted by the City of Madras and Jefferson County on 1/28/2009.

Upon inclusion of property from the URA within the Urban Growth Boundary, the property shall be subject to the Urban Growth Management Area Agreement

Finding: The land removed from the UGB will be zoned to Rangeland by Jefferson County and the area brought into the UGB (subarea J) will be concurrently annexed and zoned R-3 by the City of Madras and managed like other R-3 land within the City limits. This requirement is met.

The URAMA states that:

Designation of service responsibility, as required by OAR 660-021-0050(2) is as follows:

Service	Existing Service Provider	Future Urban Service Provider
Sanitary Trash Disposal	No Public Service Provider	No Public Service Provider
Sanitary Sewer	No Public Service Provider	City of Madras
Water	Deschutes Valley Water District	Deschutes Valley Water District
Fire Protection	Jefferson County Fire District #1	Jefferson County Fire District #1
Parks	Jefferson County	City of Madras
Recreation	Madras Aquatic Center District	Madras Aquatic Center District
Transportation	Jefferson County	City of Madras
Storm Water	Jefferson County	City of Madras

Finding: The proposal does not change the service providers applicable to lands within the urban reserve areas as set forth above.

6. Statewide Goal Consistency Analysis

This section addresses compliance with applicable Statewide Planning Goals.

Goal 1 Citizen Involvement

Goal 1 calls for the opportunity for citizens to be involved in all phases of the planning process. The public was provided the opportunity to be involved in the decision-making process regarding changes to the UGB through public meetings (in-person and by video conference), Madras Planning Commission, Madras City Council, Jefferson County Planning Commission, and Jefferson County Board of County Commissioners. Public testimony was taken at each hearing. The City of Madras notifies nearby property owners, publishes a public hearing notice and contact information in the newspaper, and facilitates public participation during public hearings.

The public has had the opportunity to be involved in decision making for issues related to the UGB land exchange analysis.

Goal 2 Land Use Planning

Goal 2 outlines the basic procedures of Oregon's statewide planning program, stating that land use decisions must be made in accordance with comprehensive plans and that effective implementation ordinances must be adopted.

Madras' acknowledged Comprehensive Plan and implementing ordinances provide a State-approved process for land use decision making, and a policy framework derived from a proper factual base. The City's Comprehensive Plan and implementing ordinances provide the local criteria by which the applicant's request will be reviewed. The proposed UGB land exchange area (subarea J) will require review and compliance with the applicable statewide planning goals. No exception to statewide planning goals is necessary.

Goal 2 also requires the consideration of alternatives. The City considered a range of alternatives for the UGB land exchanged, as documented in Sections 3 and 4 of this report. All pertinent documentation has been made available to all interested parties. Goal 2 has been properly addressed.

Goals 3 Agricultural Lands and 4 Forest Lands

As stated in 660-024-0020(1)(b), Goals 3 and 4 are not applicable when establishing or amending an urban growth boundary. No further analysis is required.

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

Goal 5 requires local governments to inventory and protect natural resources. There are no inventoried significant Goal 5 resources subarea J. No further analysis is required.

Goal 6 Air, Water and Land Resources Quality

Goal 6 requires local comprehensive plans and implementing measures to be consistent with state and federal regulations. The proposed UGB exchange will have little, if any effect on the quality of air, water and land resources of the area. By complying with applicable air, water and land resource quality policies in the Madras Comprehensive Plan, Goal 6 will be properly addressed.

Goal 7 Areas Subject to Natural Disasters and Hazards

Goal 7 requires that jurisdictions apply appropriate safeguards when planning development in areas that are subject to natural hazards such as flood hazards.

The identified natural hazards in Madras are flooding and landslide hazards. The proposed UGB exchange area (subarea J) does not have flood hazards or significant landslide hazards. The alternatives analysis considered lands within the FEMA flood hazards and areas with steep sloped, attempting to avoid expanding into areas with identified hazards. Lands included within subarea J are not subject to any known natural hazards.. Thus, Goal 7 has been properly addressed.

Goal 8 Recreation Needs

Goal 8 requires governmental organizations with responsibility for providing recreational facilities to plan for recreational facilities. The Yarrow Master Plan includes three new public parks and the existing Juniper Hills County Park is to the north of the Master Plan area. Subarea J does not itself include areas planned for parks.

Madras adopted the *Madras Parks Master Plan* in 2019. That plan inventoried existing facilities, estimates a level of service, and identified park needs. The Master Plan identified existing park improvements and new park improvements. Neither areas involved in the exchange include park land.

The land exchange proposed is for exchange of about 40 acres of land, with the area removed from the UGB and added to the UGB both zoned R-3. As a result, the proposed exchange will not significantly change Madras housing capacity or demand for new park land. Thus, Goal 8 has been properly addressed.

Goal 9 Economy of the State

Goal 9 requires jurisdictions to plan for an adequate supply of land for employment uses to further goals for economic development. There are no commercial or industrial zoned lands involved in the proposed UGB exchange. As a result, Goal 9 is not applicable.

Goal 10 Housing

The proposed UGB land exchange results in a slight increase in buildable acreage under the same R-3 zoning. Accordingly, the land exchange will result in substantially the same number of housing units. Subarea J will provide better opportunities to develop a wider range of housing types than the land being removed from the UGB. As a result, there will be little impact on the residential land supply and better opportunity to achieve the housing objectives set out in Goal 10. Goal 10 has been properly addressed.

Goal 11 Public Facilities and Services

The provision of public facilities and services was considered in the Goal 14 alternatives analysis process described above and the application is supported by will-serve letters from such providers. Subarea J provides opportunities to connect to a water main near the subarea on Yarrow Avenue and will require minimal extension of sewer service from the Yarrow Avenue and Bean Drive intersection. Extension of these services in this area will be less costly and burdensome than other alternative areas considered for the land exchange..

For the above reasons, the City finds that Goal 11 has been satisfied.

Goal 12 Transportation

Goal 12 encourages the provision of a safe, convenient and economic transportation system. This goal also implements provisions of other statewide planning goals related to transportation planning in order to plan and develop transportation facilities and services in coordination with urban and rural development (OAR 660-012-0000(1)). For the purposes of the proposed amendments, the Transportation Planning Rule (TPR) requires additional analysis if the proposed amendments would significantly affect an existing or planned transportation facility, as defined in OAR 660-001-0060(1).

The following TPR analysis by Kittleson & Associates demonstrates compliance with Goal 12 , the TPR and the provisions of City and County land use regulations that implement Goal 12 and the TPR.



September 21, 2023 Project# 28585

To: Nick Snead, City of Madras
Beth Goodman, ECONorthwest

From: Matt Kittelson & Julia Kuhn

RE: Madras Urban Growth Boundary Land Exchange

The proposed land exchange requires preparation of Transportation Planning Rule (TPR) analyses per Oregon Administrative Rule (OAR) 066-012-060. As summarized herein, the proposed land exchange does not constitute a significant effect, as defined by the TPR, if the lands were developed to their maximum reasonable level under the R-3 zoning. The remainder of this memorandum provides the details supporting this conclusion.

Transportation Planning Rule (TPR) Evaluation

Two sections of the TPR apply to amendments to acknowledged land use designations. Per OAR 660-012-0060(1) and (2), the first step in assessing an amendment's potential transportation impact is to compare the vehicular trip generation assuming a "reasonable worst-case" development scenario under the existing and proposed amendment. If the trip generation potential increases by more than 400 daily trips under the proposed amendment, additional analysis is required to assess whether the proposal will "significantly affect" the transportation system. Conversely, if the trip generation under the amendment is less than the thresholds defining a "significant effect," no additional quantitative analysis is necessary to support the change.

Trip Generation Comparison

To test for a significant effect, we reviewed the change in trip generation potential of the lands to be replaced versus that of the lands to be added. As noted above, the lands within the UGB today identified for removal are zoned R-3 and the lands identified to be brought into the UGB are planned for R-3 zoning. The net increase of the land exchange is one buildable acre. Per the City's Municipal Code Section 18.15.040 and analyses conducted on behalf of the City by ECONorthwest, the following represents the "reasonable worst-case" scenarios in terms of trip making under R-3:

- Single family homes developed at a density of 5.2 units per acre;
- Townhomes developed at a density of 15 units per acre;
- Duplexes, triplexes, and quadplexes developed at a density of 13.8 units per acre; and/or,
- Apartments developed at a density of 16.8 units per acre.

Table 1 presents a trip generation comparison for the net increase of one buildable acre associated with the lands to be added versus those to be removed. This comparison is based on information contained in the *Trip Generation Manual* (11th Edition, as published by the Institute of Transportation Engineers). As shown in the table, the maximum trip generation change associated with the proposed land exchange is associated with the potential development of 17 apartments. These apartments could result in a daily trip increase of 115 vehicular trips, of which 9 trips would occur during the weekday PM peak hour.

Table 1. Trip Generation Comparison Associated with One Additional Acre of R-3 Lands

Land Use	ITE Code	Size (units)	Total Daily Trips	Weekday PM Peak Hour Trips	Maximum for Analyses?
Single Family Detached	215	5	47	5	No
Townhomes	215	15	108	9	No
Duplex/Triplex/Quadplex	215	14	101	8	No
Apartments	220	17	115	9	Yes
Highest Trip Generation Potential			115	9	Apartments

In reviewing Table 1, Policy 1F.5 of the Oregon Highway Plan establishes the following thresholds for determining significance:

- Any proposed amendment that does not increase the average daily trips by more than 400 is not considered significant.
- Any proposed amendment that increases the average daily trips by more than 400 but less than 1,000 for state facilities is not considered significant where:
 - o The annual average daily traffic is less than 5,000 for a two-lane highway
 - o The annual average daily traffic is less than 15,000 for a three-lane highway
 - o $\,$ The annual average daily traffic is less than 10,000 for a four-lane highway
 - o The annual average daily traffic is less than 25,000 for a five-lane highway
- If the increase in traffic between the existing plan and the proposed amendment is more
 than 1,000 average daily trips, then it is not considered a small increase in traffic and the
 amendment causes further degradation of the facility and would be subject to existing
 processes for resolution.

As shown, the proposed land exchange would not result in a significant impact per OHP Policy 1F.5 as it would constitute an increase of less than 400 daily trips (i.e., only an increase of 115 daily trips). We further note that neither the increase of 115 daily trips nor increase of 9 weekday PM peak hour trips meet the City's Traffic Impact Study guidelines for necessitating a

study. Per Madras Municipal Code Section 18.25.180, a Transportation Impact Analysis is required if the land use action results in an increase of 500 or more daily trips or 50 or more PM peak hour trips. For these reasons, no quantitative analyses are needed to address the TPR nor the City's requirements.

Summary of Applicable Oregon Administrative Rule Criteria

OAR Section 660-12-0060 of the TPR sets forth the relative criteria for evaluating plan and land use regulation amendments. Table 2 summarizes the criteria in Section 660-012-0060 and the applicability to the proposed land exchange.

Table 2. Summary of Criteria in OAR 660-012-0060

Section	Criteria	Applicable?
1	Describes how to determine if a proposed land use action results in a significant effect.	Yes
2	Describes measures for complying with Criteria #1 where a significant effect is determined.	No
3	Describes measures for complying with Criteria #1 and #2 without assuring that the allowed land uses are consistent with the function, capacity and performance standards of the facility.	No
4	Determinations under Criteria #1, #2, and #3 are coordinated with other local agencies.	Yes
5	Indicates that the presence of a transportation facility shall not be the basis for an exception to allow development on rural lands.	No
6	Indicates that local agencies should credit developments that provide a reduction in trips.	No
7	Outlines requirements for a local street plan, access management plan, or future street plan.	No
8	Defines a mixed-use, pedestrian-friendly neighborhood.	No
9	A significant effect may not occur if the rezone is identified on the City's Comprehensive Plan and assumed in the adopted Transportation System Plan.	No
10	Agencies may consider measures other than vehicular capacity if within an identified multimodal mixed-use area (MMA).	No
11	Allows agencies to override the finding of a significant effect if the application meets the balancing test.	No

As shown in Table 2, there are eleven criteria that apply to Plan and Land Use Regulation Amendments. Of these, two are applicable to the proposed land exchange. These criteria are provided below in italics with our response shown in standard font.

OAR 660-12-0060(1) If an amendment to a functional plan, an acknowledged comprehensive plan, or a land use regulation (including a zoning map) would significantly affect an existing or planned transportation facility, then the local government must put in place measures as provided in section (2) of this rule, unless the amendment is allowed under section (3), (9) or (10) of this rule. A plan or land use regulation amendment significantly affects a transportation facility if it would:

- (a) Change the functional classification of an existing or planned transportation facility (exclusive of correction of map errors in an adopted plan);
- (b) Change standards implementing a functional classification system; or
- (c) Result in any of the effects listed in paragraphs (A) through (C) of this subsection based on projected conditions measured at the end of the planning period identified in the adopted TSP. As part of evaluating projected conditions, the amount of traffic projected to be generated within the area of the amendment may be reduced if the amendment includes an enforceable, ongoing requirement that would demonstrably limit traffic generation, including, but not limited to, transportation demand management. This reduction may diminish or completely eliminate the significant effect of the amendment.
 - (A) Types or levels of travel or access that are inconsistent with the functional classification of an existing or planned transportation facility;
 - (B) Degrade the performance of an existing or planned transportation facility such that it would not meet the performance standards identified in the TSP or comprehensive plan; or
 - (C) Degrade the performance of an existing or planned transportation facility that is otherwise projected to not meet the performance standards identified in the TSP or comprehensive plan.

Response: The proposed land exchange is not anticipated to result in an increase in daily trip making that constitutes a significant effect per OHP Policy 1F.5 nor does the daily or PM peak hour trip generation potential result in an increase that would warrant a Traffic Impact Analysis per the City's Municipal Code requirements. Further, no changes to the City's functional street classification designations or standards are proposed or warranted by the land swap and the adjacent facilities are appropriate for the R-3 designations. We also note that the City's Transportation System Plan identifies the future extension of Bean Drive to this area, which will benefit the connectivity provided to the Yarrow Master Plan lands.

(4) Determinations under sections (1)–(3) of this rule shall be coordinated with affected transportation facility and service providers and other affected local governments.

Response: The Applicant is coordinating the proposed zone change with Jefferson County and ODOT.

Conclusions

As discussed herein, our review concluded that the proposed land exchange and resulting increase of one buildable acre into the City's Urban Growth Boundary that is zoned R-3 does not constitute a significant effect as defined by the TPR and OHP Policy 1F.5. Further, neither the small increase in daily nor weekday PM peak hour trips associated with the land exchange require a Transportation Impact Analysis per the City's requirements.

Goal 13 Energy

Goal 13 requires land and uses developed on the land to be managed and controlled so as to maximize the conservation of all forms of energy, based upon sound economic principles. Energy consequences of the proposed urban growth area amendment have been considered in the Goal 14 alternatives analysis process. Therefore, Goal 13 has been adequately addressed.

Goal 14 Urbanization

Goal 14 has been complied with as demonstrated in Chapters 2 through 4 of this report.

Goal 15 through 19

Goals 15 through 19 are related to the Willamette Greenway and coastal resources. As such, these goals do not apply to the subject sites and no further analysis is required.