



CITY OF ROSEBURG

Urban Growth Boundary Exchange Proposal:

Staff Report and Findings

Draft: October 2, 2023

File Number	CPA-22-001
Applicant	City of Roseburg Prepared By: Stuart Cowie, Community Development Director Ricky Hoffman, Associate Planner Kate Bentz, RARE AmeriCorps Member Nik Ramstad, RARE AmeriCorps Member
Project Type	Urban Growth Boundary Amendment
Procedure Type	UGB Amendment: Type IV Comprehensive Plan Map (Major Amendment): This proposal contains an amendment of the UGB by a city with a population of 2,500 or more that adds more than 50 acres. Plan amendments are submitted to the Roseburg City Council, Douglas County Board of Commissioners, and LCDC for review for compliance with applicable local & statewide planning goals, statutes, and rules.
Request	Urban Growth Boundary amendment involving the exchange of approximately 513.5± acres. The areas to be removed from the UGB are two privately owned properties, 91.5± acres on the hillside east of NW Daysha Dr and 193± acres on the hillside north of NE Barager Ave. The area proposed to be added to the UGB is 229± acres and located on the west side of the existing boundary, generally bounded by the South Umpqua River and Troost St, a portion of an area commonly known as Charter Oaks.

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Introduction and Summary

This report provides a proposal and findings for an Urban Growth Boundary (UGB) amendment for the City of Roseburg ("City"). The amendment, if approved, includes subsequent land use actions including de-annexations, annexations, revised comprehensive plan designations, zone changes and an amendment of the City/County Urban Growth Management Agreement (UGMA).

Every city in Oregon has a UGB. These are boundaries drawn on planning maps to designate where a city expects to grow. Restrictions in areas outside of a UGB prohibit urban development to protect farm and forest land. Generally speaking, the UGB is where the city ends and farms and forests begin.

Inside UGBs, cities plan what they want their communities to look like. Each city is responsible for ensuring that there's enough land in the UGB for 20 years of growth. In order for a city to annex new areas into the city limits, that area must first be included within the UGB. A UGB is primarily intended to provide land for identified urban development needs and to separate urban and urbanizable land from rural land. Local governments, including cities and counties, rely on UGBs to guide land use and zoning decisions and to plan for the orderly provision of public facilities and services as development occurs. Cities may expand their UGB if they can demonstrate the need for more developable land. These types of UGB amendments are referred to as a "UGB Expansion".

In the case of Roseburg, the City is not requesting additional land, but rather proposing to swap residential land already within the UGB encumbered by significant development constraints with land immediately outside the UGB that already has an established residential pattern of development that is much easier to develop. Simply put, the City is proposing to swap undeveloped residential land with severe slopes for flat residential land. Ultimately, the UGB line will move in such a manner as to create an insignificant amount of net increase in the number of possible future dwelling units currently allowed in the UGB as compared to the new boundaries proposed by the swap. As described later in the report with supporting evidence, if approved the total number of future dwellings brought into the UGB will have a net increase of 13 dwelling units.

The re-adjustment of the UGB in this method is referred to by statute as a "UGB Exchange", but has been more commonly referred to locally during this process as the "UGB Swap". The two terms are interchangeable in meaning and the City has used the term UGB Swap more frequently. Both terms are referenced within this document and throughout the legislative amendment process.

The areas to be removed from the UGB are two privately owned properties, 91.5± acres on the hillside east of NW Daysha Dr. (owned by John and Donna Atkinson) and 193± acres on the hillside north of NE Barager Ave. (owned by Barry Serafin). The majority of these two properties have a comprehensive plan designation of Low-density Residential (LDR). The area proposed to be added to the UGB is 229± acres and located on the west side of the City, generally bounded by the South Umpqua River and Troost St, a portion of an area commonly known as Charter Oaks. This land exchange results in a decrease in acreage within the UGB, but will enable the same number of possible future dwelling units, by providing new opportunities for residential development.

The City established its UGB with the adoption and acknowledgement of the original Roseburg Urban Area Comprehensive Plan in 1984. Since that time, the population within the Roseburg city limits has grown from 15,800 (PSU 1984 Pop. Estimate) to 23,939 (PSU 2022 Pop. Estimate). The latest forecasted population within the Roseburg UGB is 29,631 (PSU 2022 UGB Pop. Forecast). The City's Housing Needs Analysis process began in 2019 and that analysis uses the estimated figures from that period.

As development occurred and water, sewer, and transportation master plans were adopted it became evident that the original UGB included properties that were not feasible to develop at an urban level, and the UGB excluded sites that would be a more logical extension of the urban area.

The objective of this UGB swap is to increase residential development capacity in order to meet Roseburg's housing goals for the next 20 years. In 2019 the Roseburg City Council set a goal to develop policies to enhance housing opportunities, which required the City to conduct an updated Housing Needs Analysis (HNA).

The Housing Needs Analysis (2019, ECONorthwest), made several key findings within its conclusion that help to justify the need for a UGB swap:

1. The population of the City's UGB is forecasted to grow from 30,256 people in 2019 to 35,771 people in 2039, an increase of 5,515 people. This equates to an average annual growth rate of 0.84 percent.
2. The growth of 5,515 people will result in demand for 2,768 new dwelling units over the 20-year planning period, averaging 134 new dwelling units annually.
3. Sixty percent of the future housing type needed to meet the demand of 2,768 new dwelling units will need to be traditional single-family detached units.
4. Roseburg's low density residential land base in which single-family detached units are most typically constructed has constraints to development.
5. An Urban Growth Boundary Swap can be a key tool in addressing the need for providing more flat and easily developable low density residential land.

AUTHORITY AND PROCEDURE

A UGB swap requires the removal of identified constrained lands and the addition of an equivalent sized area of land that can accommodate more efficient and logical urban development. In order to determine the most suitable land to include, a “Preliminary Study Area”, and a subsequent “Study Area” were established in accordance with OAR 660-024-0065 to examine potential locations for the exchange of the UGB. Analysis of the Preliminary Study Area and subsequent Study Area is provided later within this document.

Under the Roseburg Municipal Code (RMC), the UGB swap is subject to RMC 12.10.020 – Legislative action procedures, as it calls for a legislative amendment of the Roseburg Comprehensive Plan map. The RMC requires that the matter first be reviewed by the City of Roseburg Planning Commission which will then make a recommendation to the City of Roseburg City Council in regard to the adoption, by ordinance, of the proposed UGB amendment.

In accordance with the procedure described above, a public hearing will be scheduled before the City Planning Commission. At this hearing, the Commission will accept public testimony and review the staff proposal for compliance with the applicable OARs and Statewide Planning Goals, the goals and policies of the Roseburg Urban Area Comprehensive Plan, and any applicable criteria of the Roseburg Municipal Code. After the public hearing, the Planning Commission must make a written recommendation and forward a Findings of Fact and Decision document which explains its recommendation to the City Council. The City Council will then consider the Planning Commission’s recommendation, hold a public hearing, and make a decision to grant, amend, or deny the proposed UGB swap. Analysis of the proposed UGB swap in relationship to administrative rule, statewide planning goals and comprehensive plan policy is provided later within this document.

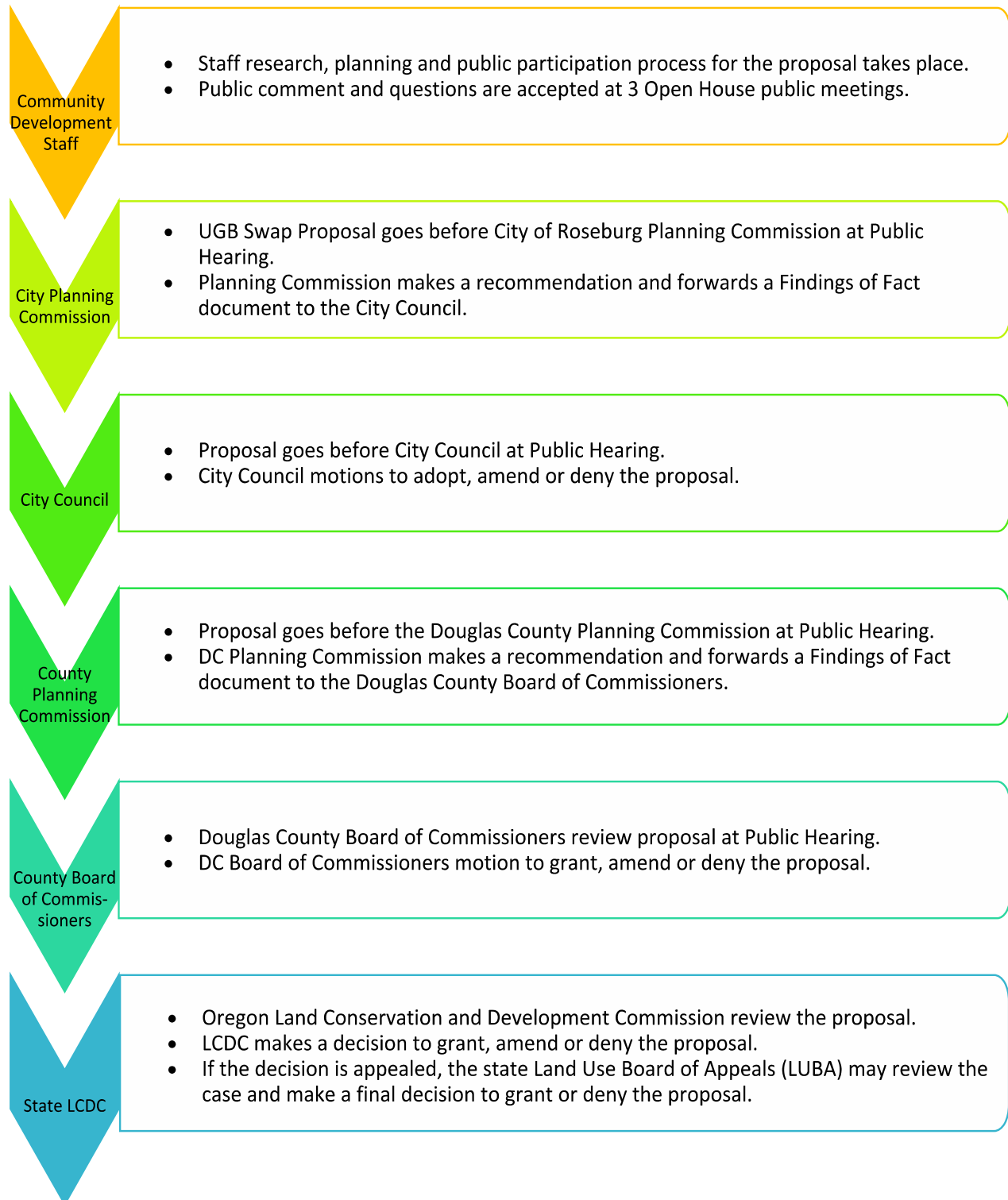
Upon completion at the City level, if approved, the decision will be forwarded to Douglas County for their review. A separate legislative process must be initiated by the County in order for the UGB swap to be recognized and new UGB lines established. Similar to the City legislative process, this will involve multiple land use actions involving new comprehensive plan designations, zone changes and an amendment of the City/County Urban Growth Management Agreement (UGMA).

If approved by the County, the application will then be reviewed by the Oregon Land Conservation and Development Commission (LCDC) to ensure the request is consistent with statewide planning goals and administrative rules.

DECISION MAKING

Exhibit 1 below describes the legislative review process that the UGB Swap must undergo for approval. Jurisdictions at multiple levels- local, county, and state government will review the facts presented, listen to comments from members of the public, and deliberate on the proposal. The process begins by being initiated at the city level through the legislative action procedure outlined in RMC 12.10.020.

Exhibit 1, Legislative Review Process Flowchart



Urban Growth Boundary Exchange

I. PROPOSAL

The City of Roseburg is proposing an exchange of land inside its urban growth boundary (UGB) for land outside its UGB pursuant to the provisions of Oregon Administrative Rule (OAR) 660-024-0070. This exchange will facilitate more concentrated development within the UGB and allow for the better utilization of existing city services and a more orderly future expansion of those services.

As required in OAR 660-024-0070(3), the areas proposed to be removed and the land proposed to be added to the UGB will provide the City with an adequate supply of buildable land to meet the existing land needs. The lands proposed to be added are in accordance with 660-024-0070(3)(a)(A), in that “A specific type of residential need is substantially equivalent to the amount of buildable residential land removed”.

Findings supporting the use of a UGB swap as a potential tool to address the need for more efficient and easily developable low density residential land is contained within the 2019 Housing Needs Analysis (HNA) was adopted by City Council as a supporting document amending the City’s Comprehensive Plan on September 9, 2019. Because this UGB exchange proposal results in swapping of land from inside the UGB to land that is currently outside the UGB the full procedure of a UGB expansion does not apply. Specifically, the land need criteria per OAR 660-024-0040(1-2), and OAR 660-024-0045 need not be addressed in this proposal.

The City has identified two sites whose owners (Atkinson & Serafin) are willing to remove their lands from the existing UGB in order to facilitate this exchange. If approved, these two properties would be added back to unincorporated Douglas County as rural residential and resource lands. The areas to be removed from the UGB are a 91.5± acre property located on a hillside east of NW Daysha Drive and 193± acres of a property located on a hillside north of NE Barager Ave, for a total of 284.5 acres proposed to be out of the existing UGB.

The following findings in this Staff Report have determined the appropriate location for the land to be included in its place. 229± acres will be added back to the UGB as a result of the exchange. This area, commonly referred to as “Charter Oaks” is primarily located at the southwest corner of the current UGB on NW Troost St, and is generally bounded by the South Umpqua River on the southeast and west, and the Felt Airport strip on the south.

The two properties identified below will be removed from the City of Roseburg UGB. Both properties are identified in Exhibit 2.

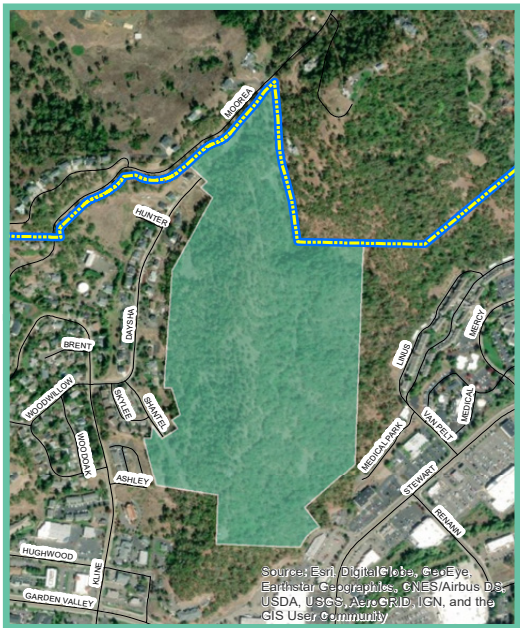
The following proposal establishes the lands proposed for removal from the UGB and determines the land that will be exchanged and added in its place.



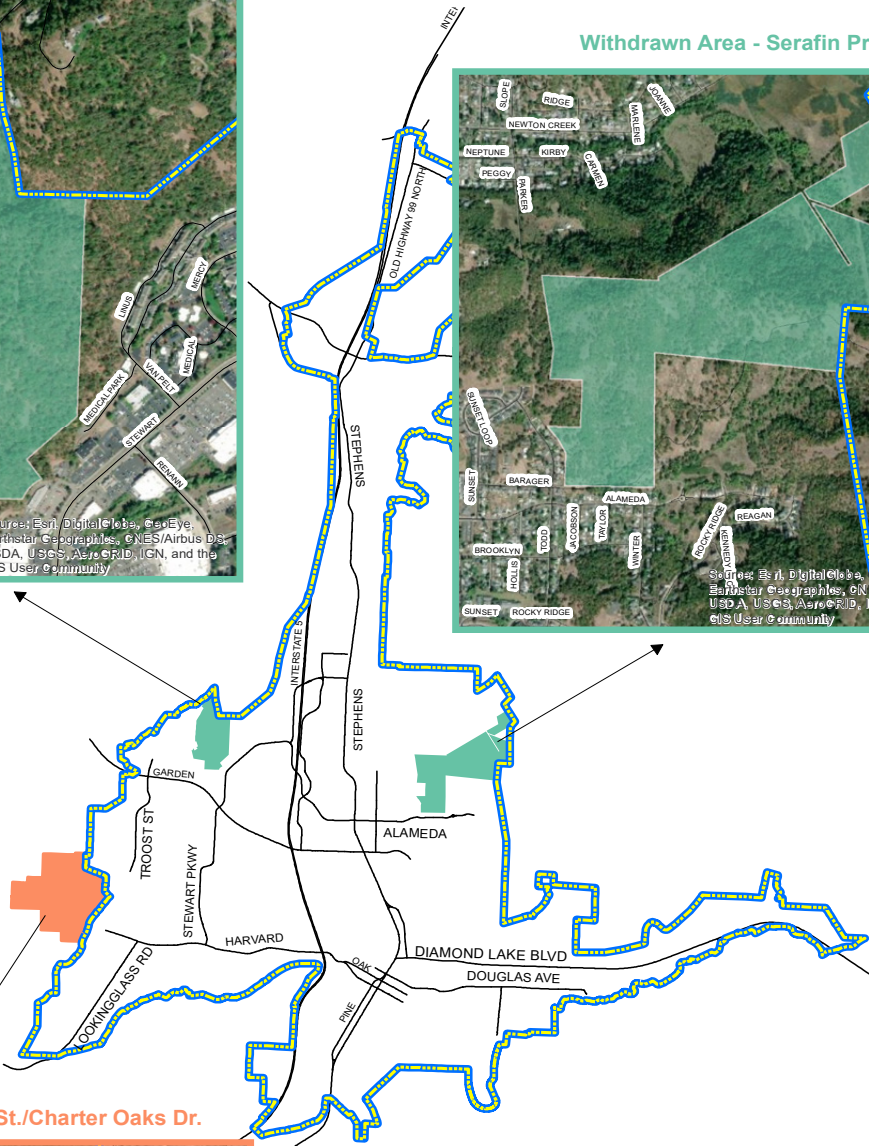
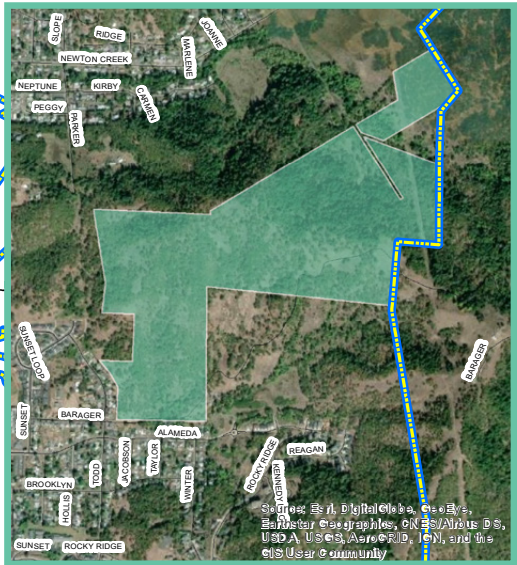
**City of Roseburg
Urban Growth
Boundary Exchange**

Project Overview

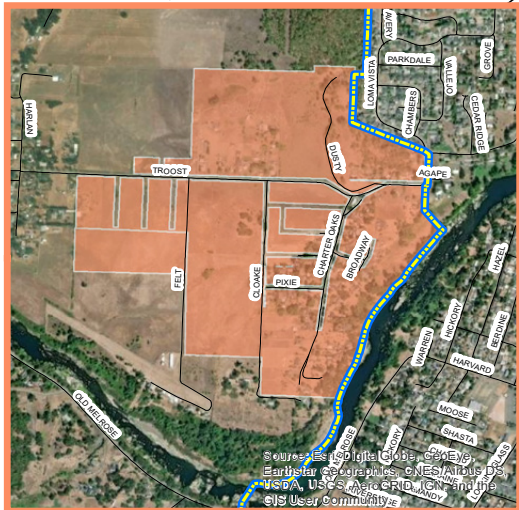
Withdrawn Area - Atkinson Property



Withdrawn Area - Serafin Property



Expansion Area - Troost St./Charter Oaks Dr.



Urban Growth Boundary



While a great deal of effort is made to ensure that digital mapping from City of Roseburg is maintained to meet specification, it is possible that data sets contain errors, omissions and inaccuracies. This data is provided to provide a visual representation of specific information regarding the City of Roseburg. These maps may contain errors and are not intended to be a final determination for land use authorization purposes. There are no warranties which accompany this product. Although information from Land Surveys may have been used in the creation of this product, in no way does this product represent or constitute a Land Survey. Please consult city staff for more information.

A. LANDS PROPOSED TO BE EXCLUDED FROM THE UGB

AREA #1 TO BE EXCLUDED (KNOWN AS ATKINSON SITE)

Owner: John R & Donna M Atkinson, Trustees of the John R & Donna M Atkinson Trust

The entire Atkinson Site is 91.5± acres in size and is located on the northeast edge of the Roseburg UGB off Shantel St. and Daysha Dr. The property is privately owned, and the property owners are willing to withdraw the entire 91.5± acres from the UGB and city limits in order to facilitate the UGB swap.

As indicated in Table 1, 68.5± acres, three quarters of the total property, are located within the County's jurisdiction and zoned RS (Suburban Residential). The other quarter of the property (23.05 acres) is located inside the City limits and is zoned MR29 and MR40.

The City proposes to remove all this property from the UGB and de-annex the portion of the property that is currently within the City limits.

Table 1, Current Zoning for Area #1 (Atkinson Site) to be excluded from the UGB.

CURRENT ZONE	ACRES
RS (County) [Suburban Residential, 1 DU/15,000 sq. ft.]	68.5±
MR29 (City) [Multiple-Family Residential, 29 DU/acre]	14.15±
MR40 (City) [High Density Multiple-Family Residential, 40 DU/acre]	8.9±

The property consists of steep slopes that form a ridge running north and south with the base of the ridge being located perpendicular to Garden Valley Blvd. The ridge serves as a dividing feature for two separate valleys, a pocket of residential neighborhoods that are the Warewood Valley subdivisions to the west and commercial property located along the bottom of the ridge adjacent to NW Stewart Parkway on the east. The land is currently vacant, except for two communications towers that are located along the southern edge of the property as the ridge begins to slope downward toward Garden Valley Blvd.

Although the Atkinsons have expressed interest in developing upper portions of the property located along the top of the ridge, development has not occurred due to the steep topography and the top of the ridge being located above the City's water service elevation line, making the property impracticable to development.

The flat portions along the top of the ridge are located outside the City limits and within the County's RS zoning designation. The steep hillslope between the homes along NW Daysha Dr. and the top of the ridge is where the high density City zoning of MR29 and MR40 exists. The location of both zones is problematic when considering out of the 8.9± acres of MR40 zoned land designated on the property, approximately 98 percent of it is on slopes of more than 25 percent and therefore considered non-buildable in the buildable lands inventory. The same is true of the 14.15± acres of MR29 zoning in which more than 97 percent is also located on slopes of more than 25 percent. Between both zoning designations over half of the property has a slope of more than 35 percent (see Exhibits 3 & 4). The severity of these slopes create a major development constraint when trying to maximize the density that these zones are intended to provide.

Removing this medium and high density zoned land from the UGB does not reduce the city's supply of buildable medium and high density residential land, nor does it increase the deficit needed for those land types as assessed by the adopted HNA. This is because the HNA uses a buildable lands inventory as a basis for projecting the long-term land need, and there are specific exclusions for what is considered "buildable land" based on state law. "Buildable Land" is defined in OAR 660-008-005(2) as meaning residentially designated land within the UGB that is suitable, available, and necessary for residential uses. Land is not considered "suitable and available" when it has slopes of 25 percent or greater, as stated in OAR 660-008-005(2)(c). This is well known and demonstrated to apply to upwards of 97% of the area zoned MR-40 and MR-29 in the swap.

Because this land was not considered as being part of the current buildable land supply in the first place, removing it from the UGB shall have little consequence on the assessed need for medium and high density residential land (this is discussed further in the Consistency with Statewide Goal 10 section later in the report). The land still has some potential development capacity, but the actual buildable lands on the site are much lower than the density allowed for the zoning, and are diminished by the steep slopes on the property. The logical way to address this is to transfer that potential development capacity to a less constrained area through this urban growth boundary exchange.

Additionally, the City finds that there are discrepancies between the Roseburg Urban Area Comprehensive Plan Map and the current zoning designation for the Atkinson Site. City staff concludes that some areas were erroneously zoned as a higher density than intended in the Comprehensive Plan. Approximately 8.9 acres of High Density Residential (HDR) comprehensive plan designated property exists as compared to 23.05 acres of medium and high density residential zoning (see Exhibit 5). This discrepancy creates issues concerning the compatibility of existing zoning with the location and total property acreage designated as high-density residential in the Comprehensive Plan. The City is uncertain how these discrepancies occurred, but are certainly aware that the slope of the property at more than 25 percent along the areas of the property designated MR29 and MR40 will preclude the ability to provide any future high density development at the density calculations anticipated within each of these zones.

One may argue that the existing apartment complex, Warewood on the Hill, located on the corner of NW Daysha Dr. and Shantel St., which sits adjacent to the subject property or even the single-family dwellings located along NW Daysha Dr., provide an example contrary to that being made by the City and that multi-family dwelling units at significant densities can be achieved in areas of significant slope. However, it should be noted that Warewood on the Hill and most of the development along Daysha Dr. was constructed along slopes ranging from 12 to 25 percent, significantly less steep than the Atkinsons property which serves as the steepest portions of the Warewood valley wall before the property finally levels off at the top of the ridge. The steep slopes of the Atkinson site to be removed from the UGB are best demonstrated in Exhibit 3 and 4, which demonstrate that this property is impracticable to development.

These development constraints are self-evident, and when compared with level land immediately adjacent to the UGB and already established with an existing pattern of residential development, it is natural to question the inclusion of The Atkinson Site into the UGB in the first place. Primarily because of steep slopes and the location of the Atkinson property above the City's water service line, the property is proposed for this exchange.






The City proposes upon completion of the UGB exchange, all 91.5± acres of this property be removed from the UGB, deannexed from city limits, and designated with Douglas County 5-Acre Rural Residential (5R) zoning as indicated in Table 2 and demonstrated in Exhibit 6. It is understood that this zoning would enable the Atkinsons to develop their property at a much lower density of 5-acres per unit. Considering that the only real

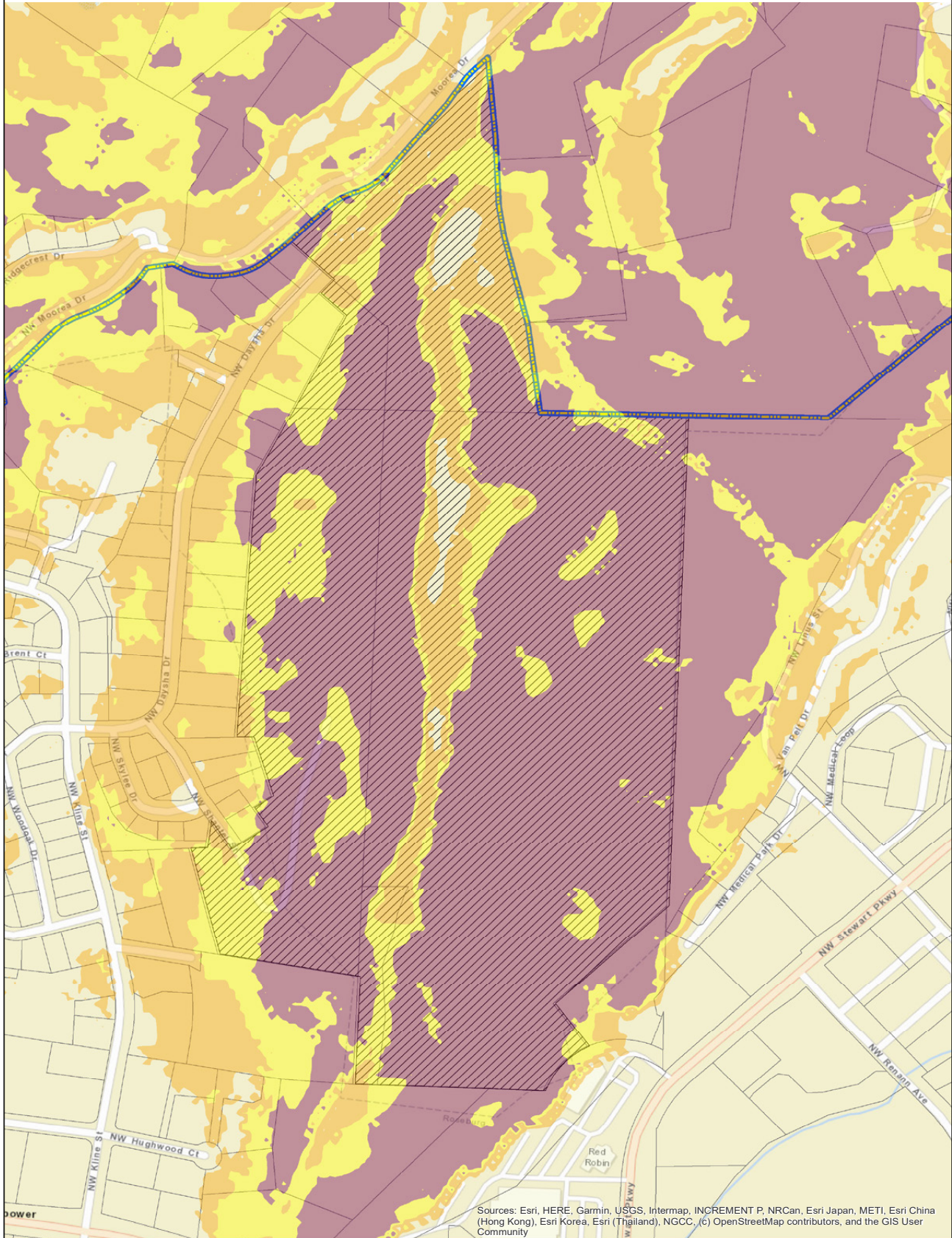
viable location for additional home sites is located on top of the ridge, the 5-acre density is more appropriate and will provide for a smaller number of homes that can more realistically be located along the top of the ridge. Future development of these homes will be subject to County land use regulations and development requirements. If this UGB swap proposal is approved through all applicable decision making authorities, future development would require land use approval through the Douglas County Planning Department and building permits from the Douglas County Building Department.

Table 2, County Zoning Proposed for Area #1 (Atkinson Site) to be excluded from the UGB.

PROPOSED ZONE	ACRES
5R [Rural Residential-5, 1 DU/5 acres]	91.5±

Atkinson Property Slope

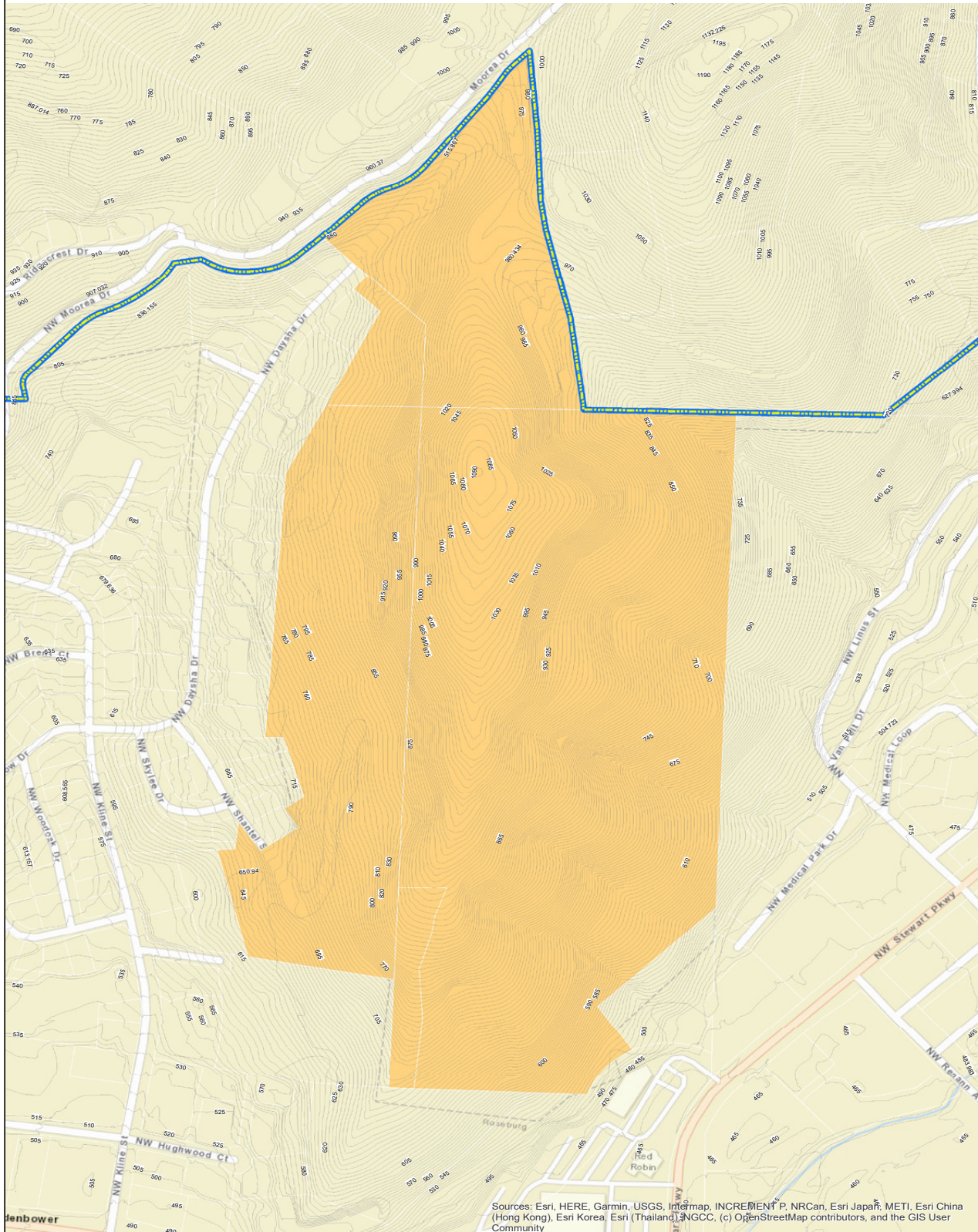
-  Lands up to and including 12% slope
 Lands greater than 12% slope and up to and including 25%
 Lands greater than 25% slope and up to, but not including 35%
 Lands 35% slope above
  Urban Growth Boundary



5 foot contour interval

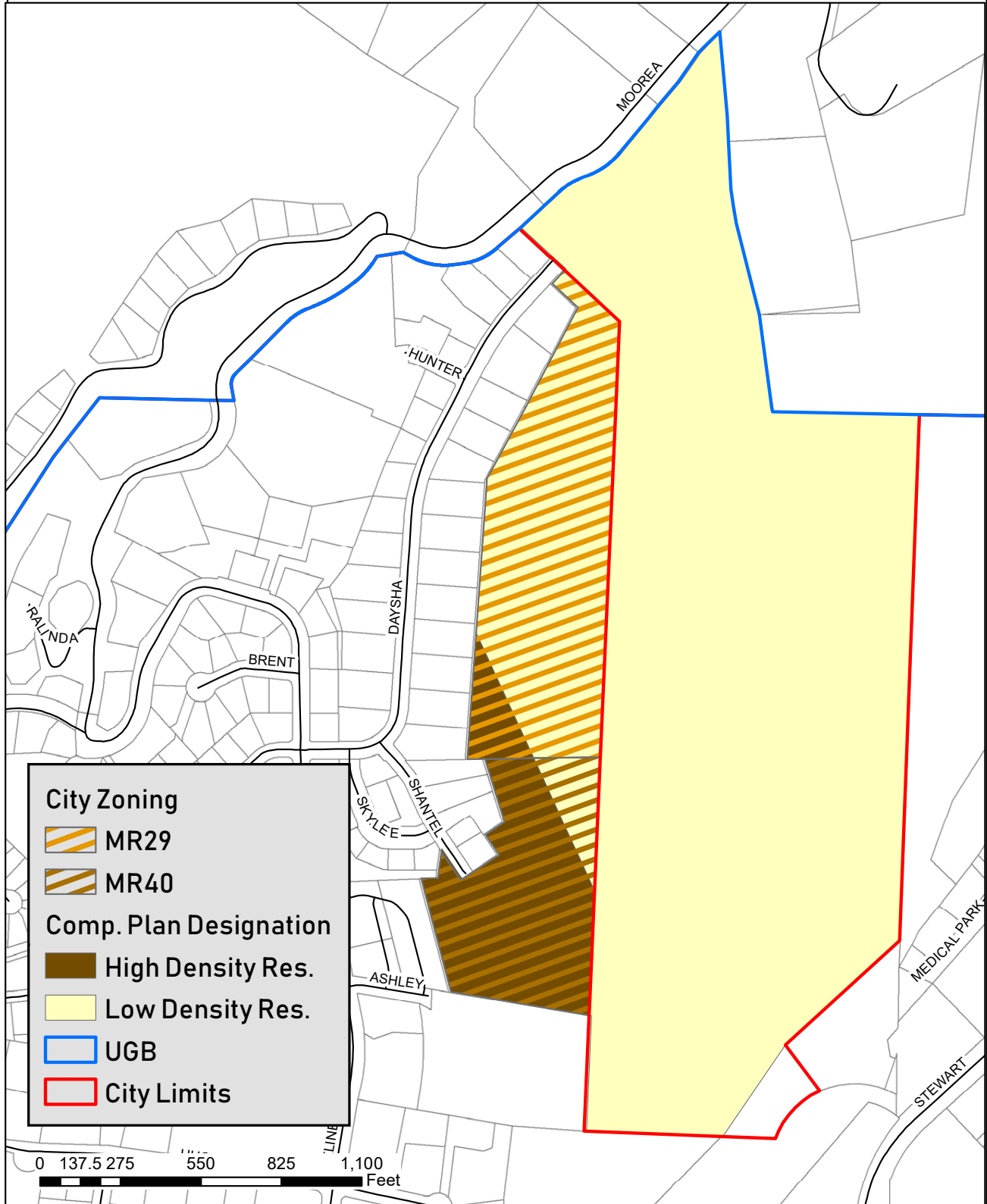


Urban Growth Boundary





City of Roseburg Urban Growth Boundary Exchange City Comprehensive Plan Designation + Zoning Atkinson Site



Atkinson Current/Proposed Zoning

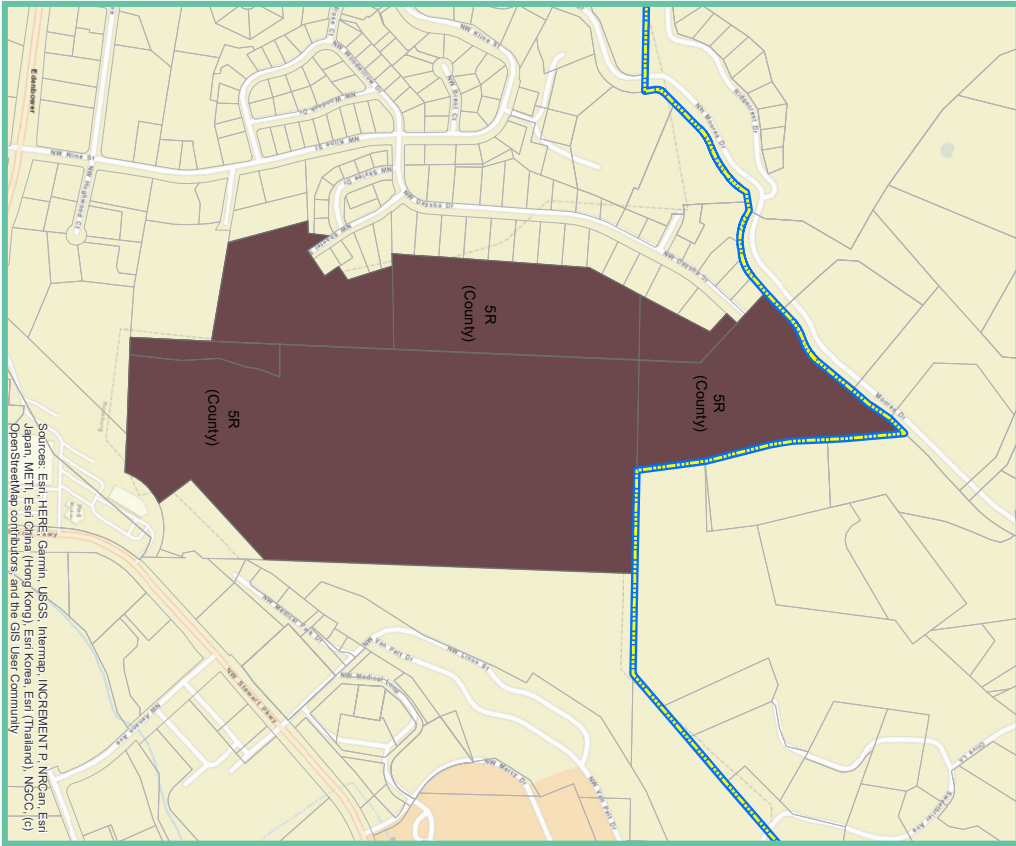
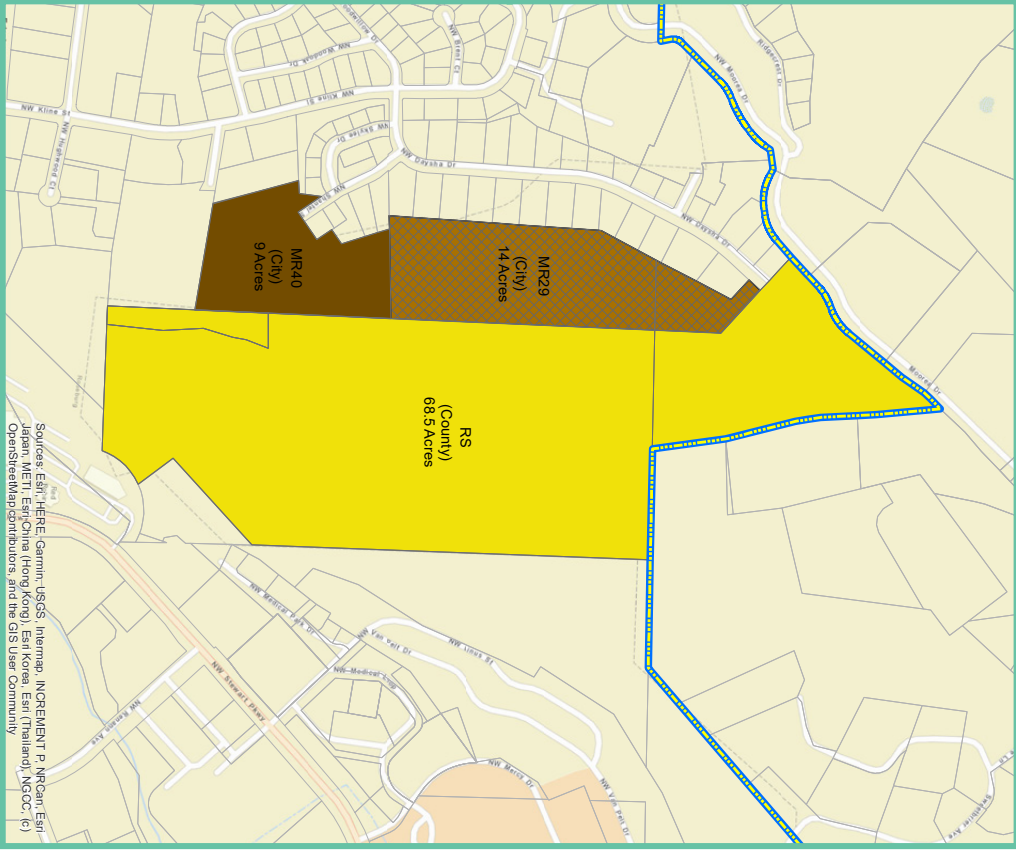


Exhibit 6, Atkinson Site Current / Proposed Zoning Map
Existing Urban Growth Boundary

Existing Zoning

Proposed Zoning

AREA #2 TO BE EXCLUDED (KNOWN AS SERAFIN SITE)

Owner: Serafin Limited Partnership (Barry Serafin)

The entire Serafin site is 193± acres in size and is located on the northwestern edge of the UGB off NE Barager Ave. The property is privately owned, and the property owners are willing to withdraw the property from the UGB and city limits in order to facilitate the UGB exchange. The property to be removed consists of upward slopes running north to the crest of a ridge line forming a hillside that divides neighborhoods along Newton Creek Rd. with neighborhoods to the south along NE Alameda Ave. This property has been part of the existing UGB for many years. No structural development is currently on the property.

Table 3, Current City Zoning for Area #2 (Serafin Site) to be excluded from the UGB.

CURRENT ZONE	ACRES
R10 (City) [Low Density Residential, 1 DU/10,000 sq. ft.]	193±*

Upon completion of the UGB exchange, 193± acres of this property will be removed from the UGB/city limits. Approximately 114± acres will be designated with Douglas County zoning 5-Acre Rural Residential (5R), while the northwestern portion of the property totaling 79± acres will be zoned Farm Forest (FF).

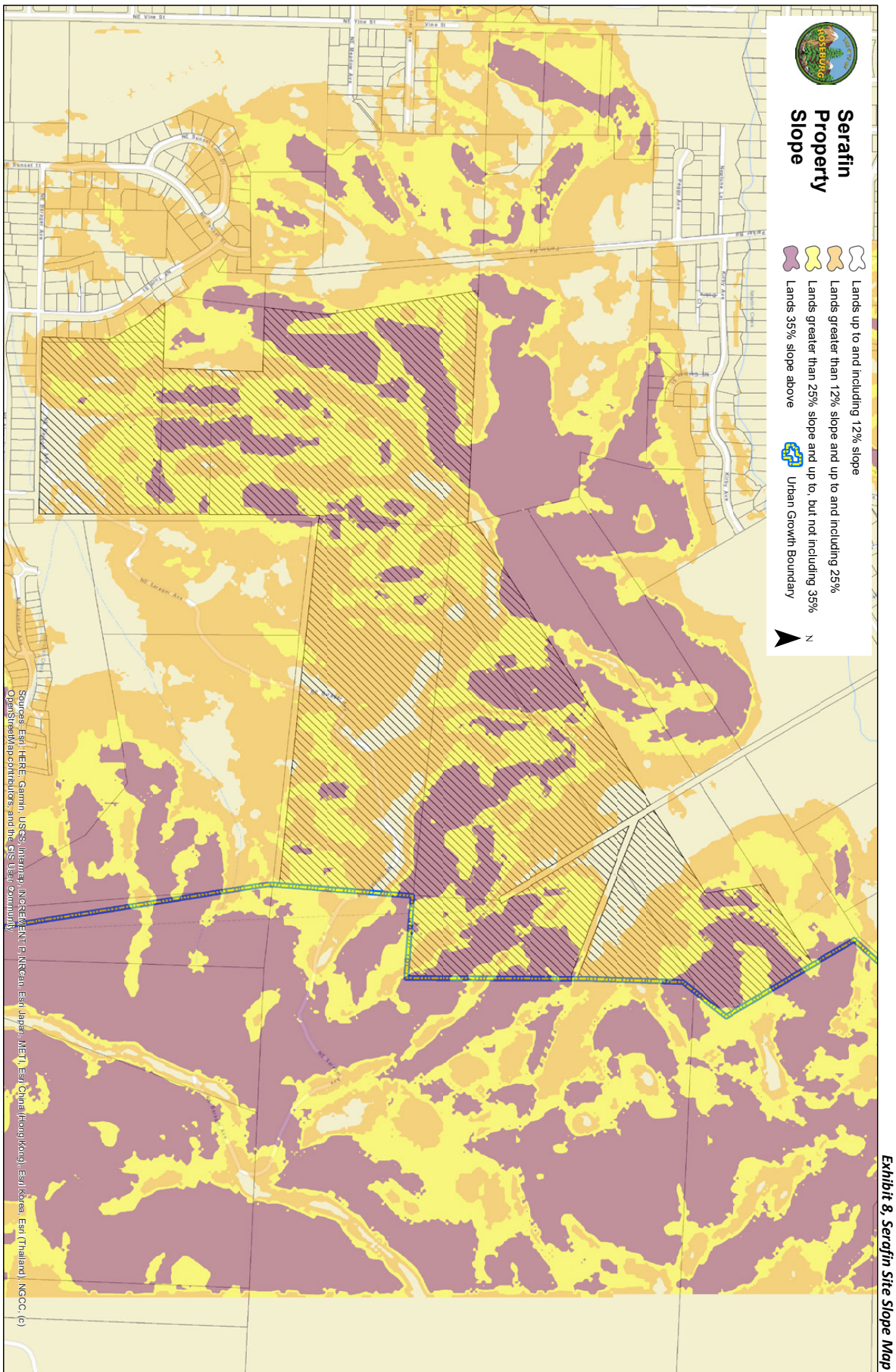
Table 4, County Zoning Proposed for Area #2 (Serafin Site) to be excluded from the UGB.

PROPOSED ZONE	ACRES
5R [Rural Residential-5, 1 DU/5 acres]	114±*
FF [Farm Forest]	79±*

The 193± acres of the Serafin property proposed to be removed from the UGB and city limits consists of multiple lots created as part of a plat filed in May of 1912. The plat was completed by the Roseburg Orchards Company and is referenced as “Tract 1, Plat 1”. Exhibit 7 is a copy of the recorded plat and highlights the boundary of the proposed property to be removed with the existing lots identified on the plat. The property consists of portions of Lots 105, all of lots 121 – 135 and portions of 136, and 142 – 145. The platted lots vary in size, but primarily consist of 4.96 acre pieces, 6.26 acre pieces, 10 acres pieces and 11 acre pieces. Unfortunately, it appears little consideration was given to the layout of these lots in relation to the topography of the area or their future development. This is evident in the right-of-way dedicated for the purpose of what is now NE Barager Ave. The right-of-way recorded on the plat implies a road that is to be built in straight lines with 90 degree turns, neatly following the boundary of the plat. NE Barger Ave. west of NE Todd St. quickly leaves the confines of the right-of-way identified on the plat and instead becomes a private gravel road that meanders up the hillside following the path of least resistance as provided by the steep topography which increases in slope the further you move up the hillside.

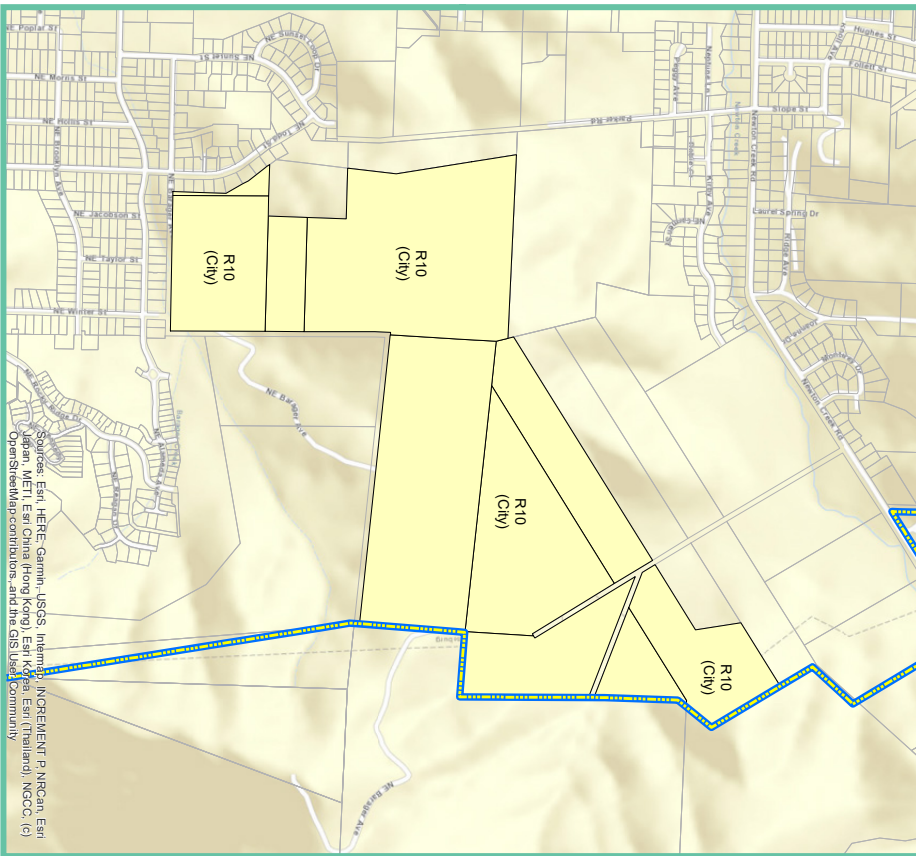
Of the 193± acres that make up the property approximately 58 percent or 111.5± acres consist of slopes greater than 25 percent (see Exhibit 8). 35 percent or 67.5± acres consist of slopes of 12 to 25 percent and only 7 percent or 14± acres of the property has no slope constraints. Many of these flatter areas are located along the top of the ridge or on small benches formed near the eastern portion of the property making them challenging to access. The topography of the site is best shown in Exhibits 8 and 9.

In addition to the steep slopes making this property impracticable to development , almost the entirety of the property sits above the current water service elevation. Meaning that in order to provide domestic water service a new water reservoir would need to be constructed near the top of the property in order to serve any future development.



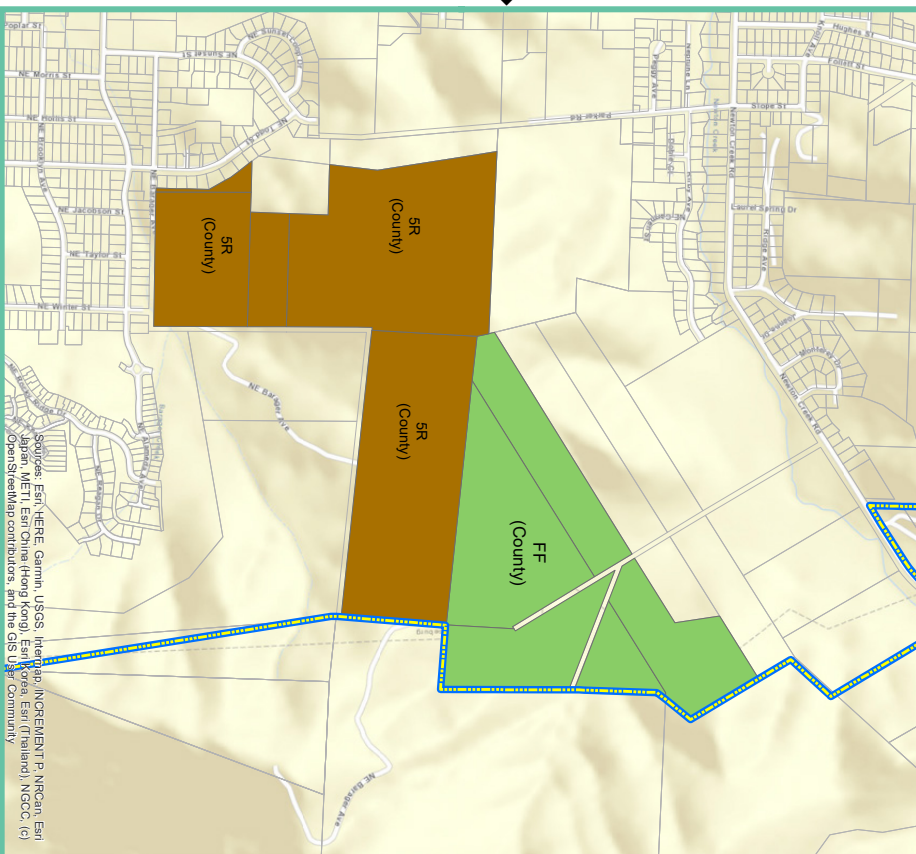


Existing Zoning



Proposed Zoning

Rural Residential (5R) - 114 Acres
Farm Forest (FF) - 79 Acres



B. SUMMARY OF LANDS TO BE INCLUDED IN THE UGB:

The City proposes to add the area described below and shown in Exhibits 11, 12, and 13 into the UGB as part of the proposed exchange. This area has been identified as the preferred area for the exchange through a thorough analysis of alternative sites as prescribed in State statute. The area is identified as the eastern portion of Charter Oaks and is located primarily to the west of the existing UGB, extending along Troost St. into a peninsular shaped area encapsulated by the South Umpqua River in the southeast and southwest. The land is relatively flat, has access to existing roads and utilities, can facilitate the extension of additional utilities, and has an appropriate mixture of vacant and already developed residential lands. This area is predominantly designated Rural Residential land (2 acre) by Douglas County with the remaining parcels designated as Exclusive Farm Use – Grazing. In total, the exchange area selected is 229± acres.

Table 5, Current County Zoning for Exchange Area to be included in the UGB.

CURRENT ZONE	ACRES
RR [Rural Residential-2, 1 DU/2 acres]	116±
FG [Exclusive Farm Use-Grazing]	113±

The proposed exchange area is part of a greater area known as Charter Oaks, which has been identified as a future area for urban expansion in plans at the City and County level for more than 40 years. The details of this history are provided to supply context, however they are not the primary determinant for this areas selection in the proposal. The Study Area Analysis within this report uses the procedures and methodology defined in OAR 660-024-0065 and OAR 660-024-0067 to determine the appropriate areas eligible for the exchange. Through the evaluation of lands in the Study Area that are eligible for inclusion in the UGB through the exchange process, the City determined that the Charter Oaks area is the best location.

In 1977, the City purchased its water system from the Oregon Water Corporation and converted it into a public utility. This system provides water services within the city limits and to places outside the urban area, including the areas of Charter Oaks and Dixonville. Preliminary maps of the proposed UGB included Charter Oaks, but were removed prior to the official adoption of the Roseburg Urban Area Comprehensive Plan in 1983. Later in 1989, the City conducted a periodic review of its Comprehensive Plan. The Planning Commission recommended that about 500 acres in the Charter Oaks area be added to the UGB. No final action was taken by the City to adopt the proposed changes.

Douglas County and the City developed an Urban Growth Management Agreement (UGMA) in 1994 in order to guide development for areas outside the city limits. Section 10.1 of the UGMA identifies Charter Oaks as an “Area of Mutual Interest outside of the UGB for the purpose of establishing a process for the provision of urban services and future urbanization” (see **Appendix 1**). In 1996, 39 property owners requested that their land in the Charter Oaks area be added to the UGB, which made up roughly 219 acres. After several public hearings, the request was withdrawn due to the Planning Commission’s concern that the proposed boundary was “too irregular.”

Then in 2006, City Council outlined its UGB policy regarding urban expansion toward encouraging efficient and economical land use in areas most suitable for development. As development occurred and water, sewer, and transportation master plans were adopted it had become evident the original bounds of the UGB included properties that were not feasible to develop at an urban level and excluded sites that would be a more logical extension of the urban area. To address these issues, the City conducted a Buildable Lands Inventory (BLI),

which resulted in a quantified need for up to 1,200 acres of vacant residential property able to accommodate urban density. Unfortunately the BLI was never adopted, however a UGB expansion process was initiated as a result. By 2008 the City conducted a UGB Expansion Study which identified five suitable areas for urban expansion. Based on the analysis conducted on the alternative areas, the Charter Oaks area was selected as a primary area for expansion. The study was never finalized as a result of concerns that the Average Annual Growth Rate at the time did not justify the expansion under state statute, as well as concerns involving neighbors within the Charter Oaks area.

In 2018, the City began to develop a proposal for a UGB lands swap after two property owners (Atkinson & Serafin) with large parcels that could not be feasibly serviced or developed at city standards approached the Community Development Department to discuss removing their properties from the city limits and UGB. Shortly thereafter, the City applied and received DLCD grant funding to conduct a new HNA and BLI. The HNA identified a UGB swap as a proposed policy action to help meet projected housing needs.

After determining a Preliminary Study Area, a Study Area, conducting an analysis of prioritization for lands within the Study Area, and an evaluation and consideration of the Goal 14 factors as determined by DLCD, the City of Roseburg determined the Charter Oaks subarea as the best lands to include into the UGB as a result of this exchange proposal. The exact area was then defined (maps for the proposed UGB exchange are provided later in this report). The City proposes to assign the newly added lands in the UGB with two separate City Comprehensive Plan Land Use Designations, as shown in Table 6. The majority of the area will be designated as low density residential, with a small portion of land owned by the Roseburg Public School District assigned a public/semi-public designation for the use of future school sites.

Table 6, Proposed City Comprehensive Plan Land Use Designation for areas to be included in the UGB.

PROPOSED COMPREHENSIVE PLAN DESIGNATION	ACRES
Low Density Residential	211.5±
Public, Semi-public	17.5±

Low density residential is a logical selection for a new comprehensive plan designation in this area. This designation most accurately reflects the existing pattern of development in the existing Charter Oaks neighborhood. The current County comprehensive plan designation is Rural Committed-2 (RC2). Rural Committed residential areas are designated to identify land that has previously been developed for residential purposes but can no longer be considered for resource use. The RC2 designation also indicates a committed area where parcellation and potential development should not exceed a density of one dwelling unit per 2 acres. Most of existing Charter Oaks neighborhood exceeds this density standard. Residential development inside Charter Oaks, proposed as part of this UGB swap, is located in the development of six different subdivisions, each recorded prior to current zoning requirements.

- Charter Oaks Subdivision - 1947
- Stringer Plat - 1949
- Park Haven Subdivision - 1955
- Fairlea Subdivision - 1955
- Charter Meadows Subdivision - 1959
- Charter Tracts - 1966

Between these six subdivisions, 120 residential lots were created. Approximately, 93 of the lots are less than 1/3 acre or 14,520 square feet in size, well below the current 2 acre density.

Of the six subdivisions recorded, only three achieved full build out (Charter Oaks, Stringer Plat, and Charter Meadows). The other three have either partially developed or have been left completely undeveloped. This includes not only the absence of residential homes, but also the absence of public infrastructure in dedicated rights-of-way, namely streets and utilities.

The biggest hurdle facing development of these vacant lots today is access to public water and sewer services; issues that could eventually be remedied, upon completion of the UGB swap. Although the current County RR zoning allows for development, poor soil conditions have limited the ability of property owners to obtain positive site evaluations for septic system approval on individual lots. In addition, existing wells within Charter Oaks neighborhood have historically run dry during summer months making private wells an impractical option for potable water.

Despite not being fully developed, it is important to note that the subdivisions within the UGB swap area exist have created a pattern that has helped to form the way in which the Charter Oaks area has developed over the last 70 years. The creation of the six subdivisions identified above, has helped to establish much of the residential development pattern that now exists. Early development of the Charter Oaks area and the anticipation of continued development of the area, led the Roseburg Public School District to purchase 17.5 acres of property on September 10, 1963, which is located between the Fairlea and Park Haven Subdivisions for placement of a future elementary school. This property is still owned by the school district and is the location proposed to be assigned a Public, Semi-public (PSP) Comprehensive Plan designation, as the school district has continued to express plans to utilize the land for a future school site in accordance with an increase in enrollment projected in the (2019) Roseburg School District-Long Range Planning report. Overall, the entire 17.5± acres property owned by the Roseburg Public School District will be designated as Public, Semi-public (PSP) in order to accommodate the possibility of new schools and help to plan for future enrollment growth. Prior to the annexation of the PSP lands to the City, the County zoning will be Public Reserve (PR) for the 17.5± acres.

The justification for designating a portion of the land brought in as Public Reserve (PR), is to address the anticipated growth of the Roseburg School District and the overall increase in enrollment projected in the coming years. An Educational Facility Assessment & Long Range Planning study was completed in 2019 by Cooperative Strategies in order to analyze key planning areas and projections for the Roseburg School District (Attached as Appendix 2). This study developed 10-year enrollment projections for the Roseburg Public Schools using the cohort survival methodology, a popular methodology used to forecast K-12 enrollment, which showed that the projected enrollment will increase over the 10 years of the projection period. The report details low, moderate, high, and recommended enrollment projections. The recommended projected enrollment shows an increase in enrollment from 5,799 in 2018-19 to 6,416 in 2028-29. Recommendations from the report include a change to a K-8 grade configuration, with the creation of these schools through a combination of construction and renovations to existing sites. The current portfolio of schools is aging, and many facilities will require replacements in the coming decade or two. Cooperative Strategies recommended the Roseburg Board and Superintendent engage in further conversations with school and community stakeholders to determine a vision for future school replacements. With these recommendations, and the existing land being owned by the District, the logical comprehensive plan designations have been proposed.






In addition to a City Comprehensive Plan designation, it will also be necessary to reassign the newly added lands to the UGB with new county zoning. As part of the conditions of the proposal, the new lands coming into the UGB will fall under the County's jurisdiction for land use until the time at which they are annexed. This jurisdictional responsibility is laid out in the UGMA (see Appendix 1), which defines all areas within the UGB under two subareas; Jurisdictional Subarea #1 includes all the areas within the UGB that are under the City's land use jurisdiction and have city zoning assigned to them, Jurisdictional Subarea #2 includes all the areas within the UGB that are under the County's land use jurisdiction and retain county zoning. The exchange area shall be designated under Jurisdictional Subarea #2 as defined in the UGMA in order to best ease the transition from rural to urban use.

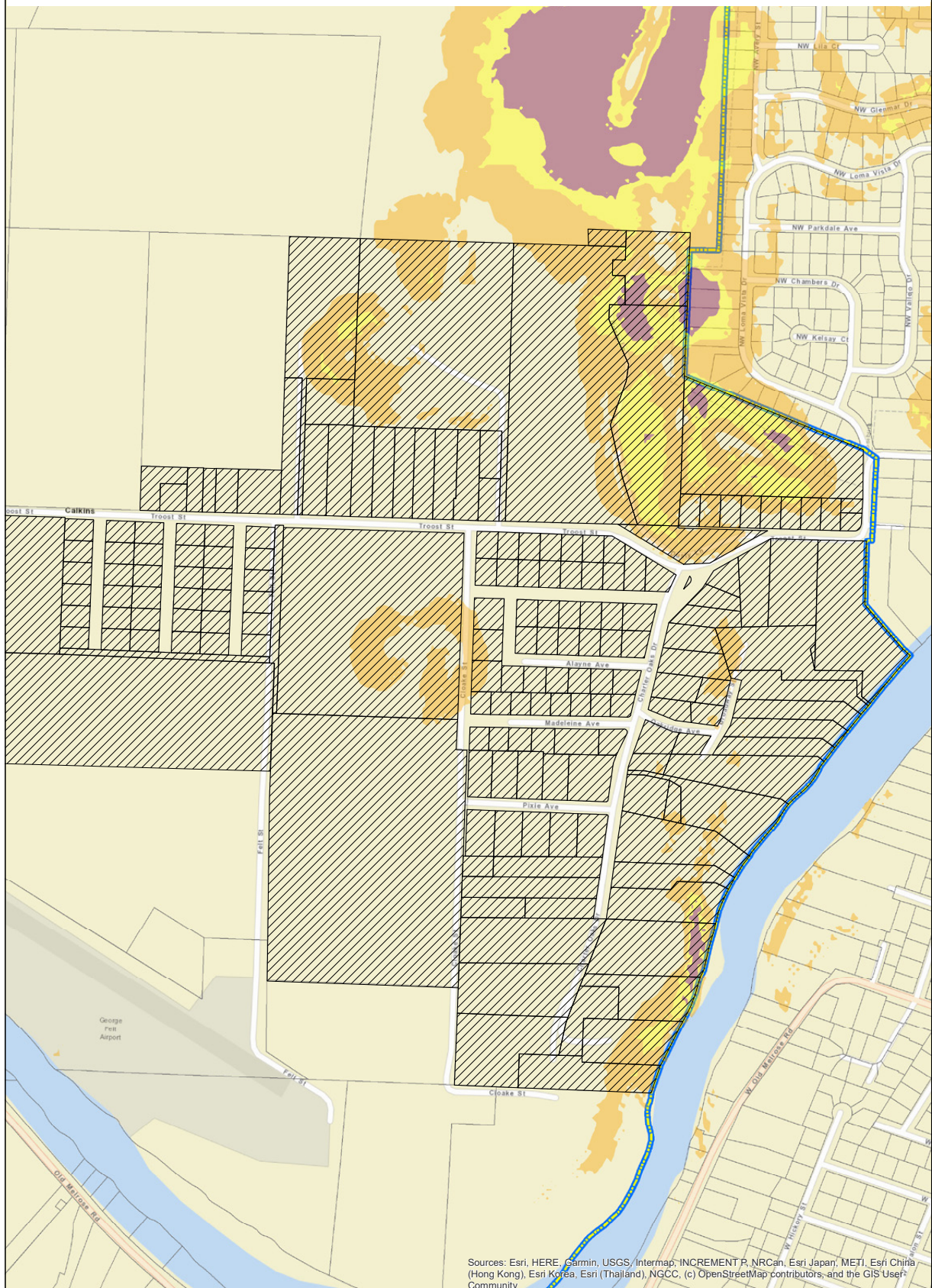
Because the land is proposed to enter a UGB with the intent of being urbanized in the future, the current zoning must be altered to best match that outcome, as well as to match the city's comprehensive plan designations. The following table shows the proposed zone changes for the exchange area:

Table 7 Proposed County Zoning for areas to be included in the UGB.

PROPOSED COUNTY ZONE	ACRES
Suburban Residential (RS) [1 DU/30,000 sq ft]	211.5±
Public Reserve (PR)	17.5±

Properties will be required to annex into the city limits prior to major development, or for any extension of water or sewer services. The proposed UGB swap does not include the annexation of any private property. A portion of the public right-of-way of NW Troost St. will be annexed to the edge of where the new UGB is proposed to be located near the western portion of the Fairlea subdivision. The annexation of Troost St. will help to facilitate private property owners immediately adjacent to the right-of-way with the ability to voluntarily annex their properties if they so choose. The City will utilize its annexation policy adopted by Council through Resolution No. 2006-04 when evaluating properties that are proposed to be annexed. When annexed it is anticipated that properties assigned a county zoning: Suburban Residential (RS), and Roseburg Comprehensive Plan: Low Density Residential designation will be assigned the Low-Density Residential (R-10) city zoning. Similarly, properties assigned a county zoning: Public Reserve (PR), and Roseburg Comprehensive Plan: Public, Semi-public (PSP) designation will be assigned the Public Reserve (PR) city zoning. Further information about annexation can be found near the end of this document in the annexation section.

-  Lands up to and including 12% slope
 Lands greater than 12% slope and up to and including 25%
 Lands greater than 25% slope and up to, but not including 35%
 Lands 35% slope above
  Urban Growth Boundary

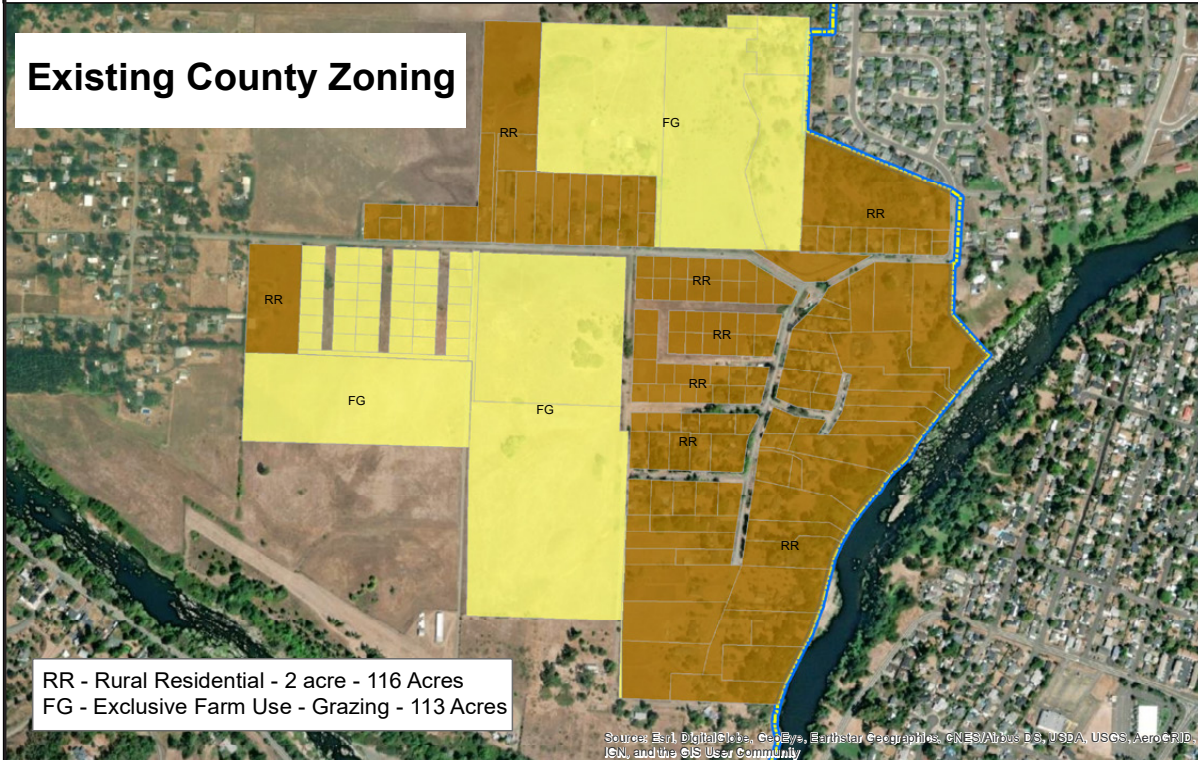




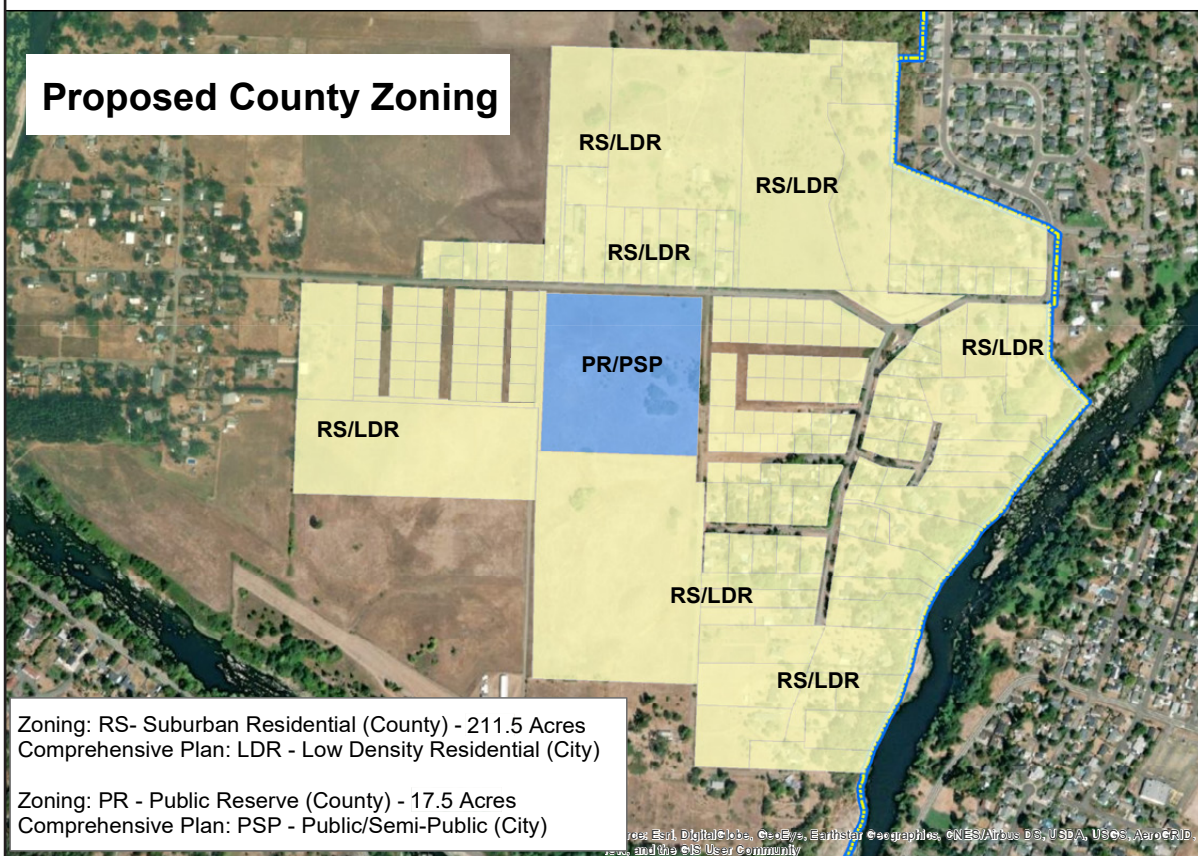
**City of Roseburg
Urban Growth
Boundary Exchange**

**Exchange Area:
Existing and Proposed Zoning**

Existing County Zoning



Proposed County Zoning



2. ANALYSIS OF PROPOSAL

To justify the UGB exchange, the City has established a Study Area in compliance with OAR 660-024-0065 to examine alternative locations for the exchange. The following describes the process the City used in establishing the preliminary study area, the study area, and the results of analysis of lands identified as potential sites for the exchange of the UGB.

A. PRELIMINARY STUDY AREA (OAR 660-024-0065(1))

OAR 660-024 provides direction on establishing the UGB study area, which begins by establishing a Preliminary Study Area pursuant to the provisions contained within subsection 0065(1).

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 City of Roseburg has a UGB population greater than 10,000 as the UGB population was 23,939 in 2022 according to the 2022 Certified Population Estimates produced by the Portland State University Population Research Center. Therefore, for purposes of the Study Area Analysis, the City reviewed land in the Preliminary Study Area within a one mile buffer of the Roseburg UGB, as shown in Exhibit 14, which includes all Exceptions areas within a 1.5 mile buffer.

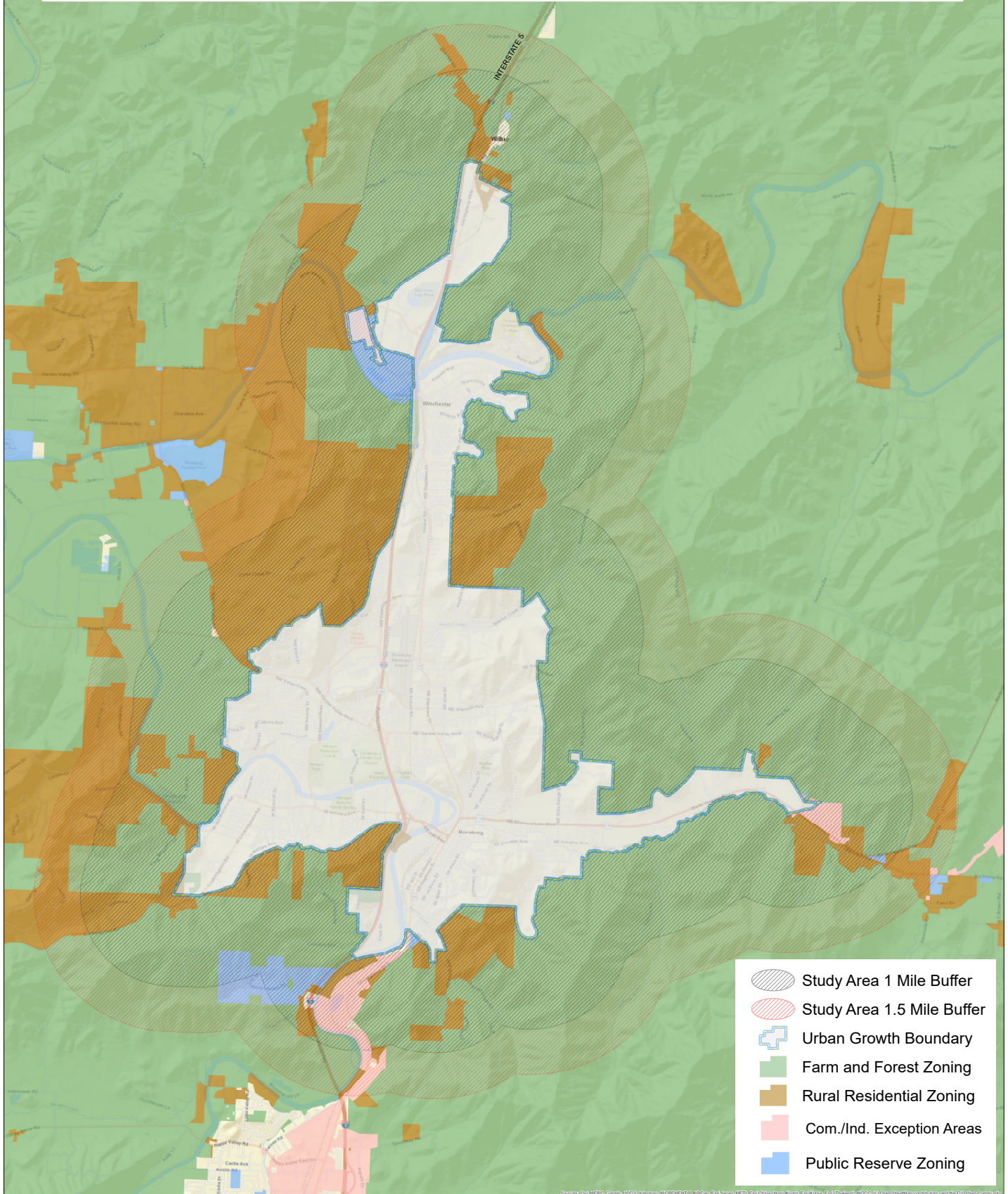
As shown on Exhibit 14, the Preliminary Study Area within the one and 1.5 mile “buffer” includes the areas of Dixonville and South Deer Creek to the east. The east side buffer of the UGB also includes areas accessed by Newton Creek Road/Hughes Street, and lands lying further to the north along Southridge and Deer Fern Way.

The buffer areas extend into Wilbur, Del Rio, and along North Bank/Page Road, and also encompasses a large portion of area west Garden Valley Road toward Riversdale. The buffer area also includes all of Charter Oaks and Harlan Street area and a majority of the exception lands along Old Melrose Road and Lookingglass Road. To the south, the buffer area includes lands that abut Military Avenue and the entirety of the community of Shady along Hwy 99 South and finally the areas along Parrot Creek/Booth Avenue and Ramp Canyon. The total Preliminary Study Area consists of approximately 30,693 acres of land, and is broken down into 13 subareas which are described further in this report.



**City of Roseburg
Urban Growth
Boundary Exchange**

**Preliminary Study
Area Overview**



B. EXCLUSION OF LANDS FROM PRELIMINARY STUDY AREA

Prior to engaging in the specific prioritization criteria for land evaluation of the Study Area contained within OAR 660-024-0065 and OAR 660-024-0067, the City finds it prudent to eliminate certain lands from the Preliminary Study Area prior to moving forward with the remainder of the Study Area analysis.

In addition to these lands having practical barriers to effect and orderly urbanization, they contain fundamental characteristics that make them the lowest priority for future inclusion into the UGB. These areas are shown in Exhibit 15. These lands consist predominantly of larger tracts of ownership currently used for farming or forest practices. All of the lands excluded from further consideration at this point are zoned with Farming or Forest zoning designations. All of the exception lands in the Preliminary Study Area have been kept in for further analysis.

Because all of these lands are planned and zoned by Douglas County as either farm or forest lands or a combination thereof, the City finds that consideration of these lands would be inconsistent with state law, as well as, unsupported by the policies and objectives of the Douglas County Comprehensive Plan.

The primary reason for exclusion of these lands from the Preliminary Study Area is demonstrated in Exhibit 16. Pursuant to OAR 660-024-0065(4)(b)(A), these lands are excluded from further analysis due to the landslide susceptibility presented.

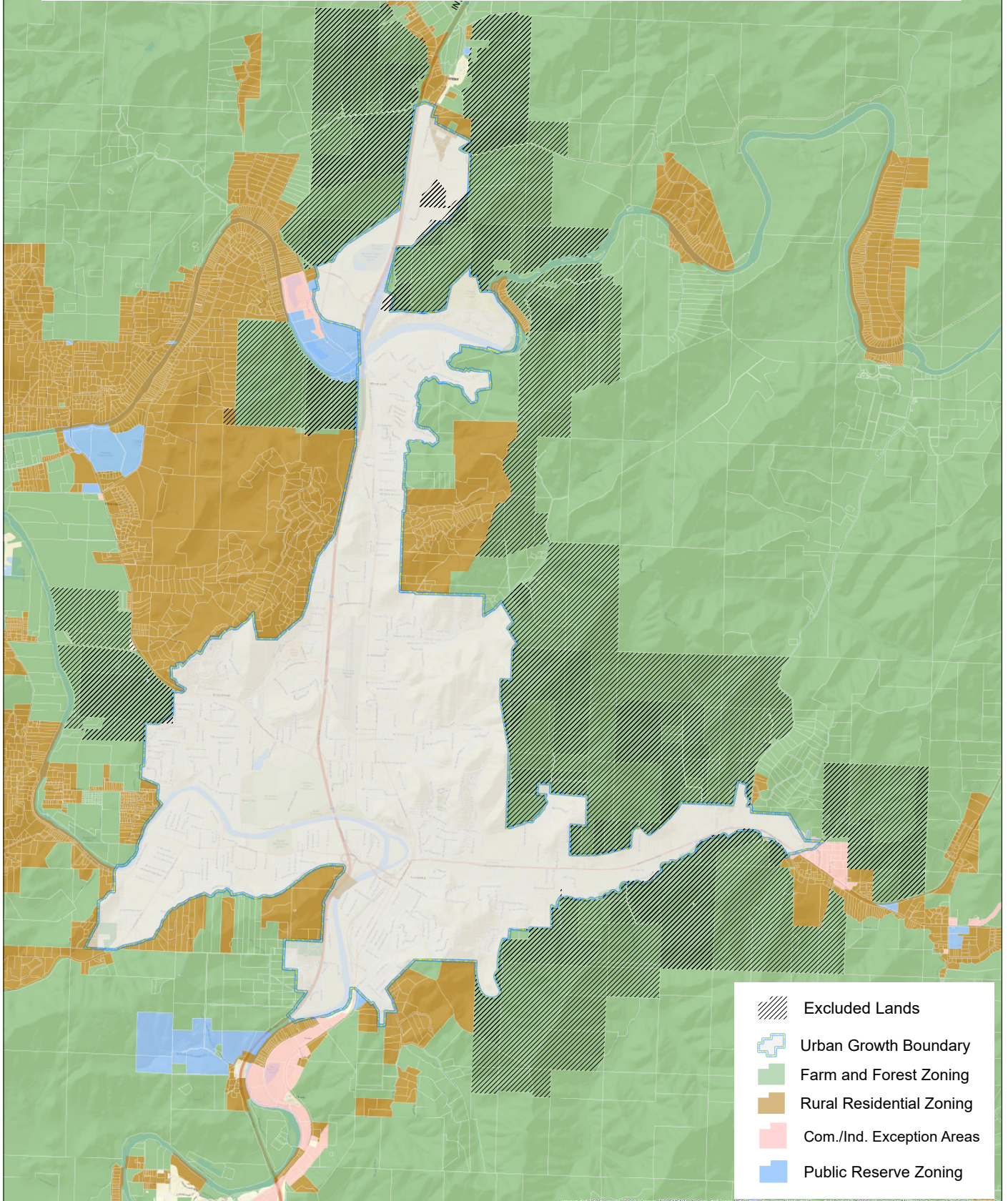
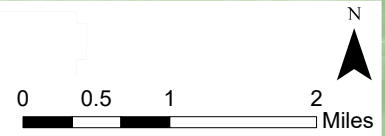
The removal of these lands from the Preliminary Study Area is further justified under 660-024-0067, which reestablishes the importance of 660-024-0065 for excluding lands from the Preliminary Study Area. The lands to be excluded from the Preliminary Study Area, shown in the hatched in Exhibit 15, cannot be reasonably developed or infilled due to the location of the existing infrastructure. While not the primary reason for exclusion, the existing development patterns of rural residential further make the land unsuitable in accordance with 660-024-0067(5)(B).

The lands excluded from the preliminary study will not be considered for further analysis. The areas excluded from further analysis make up approximately 18,537 acres, roughly 60 percent, of the total 30,693 acres considered within the Preliminary Study Area. These lands have barriers that make the inclusion of them impractical to providing necessary public facilities or services to encourage orderly urbanization. This analysis supports removing the lands from consideration as shown in Exhibit 15.



**City of Roseburg
Urban Growth
Boundary Exchange**

**Preliminary Study Area
Land Exclusions**

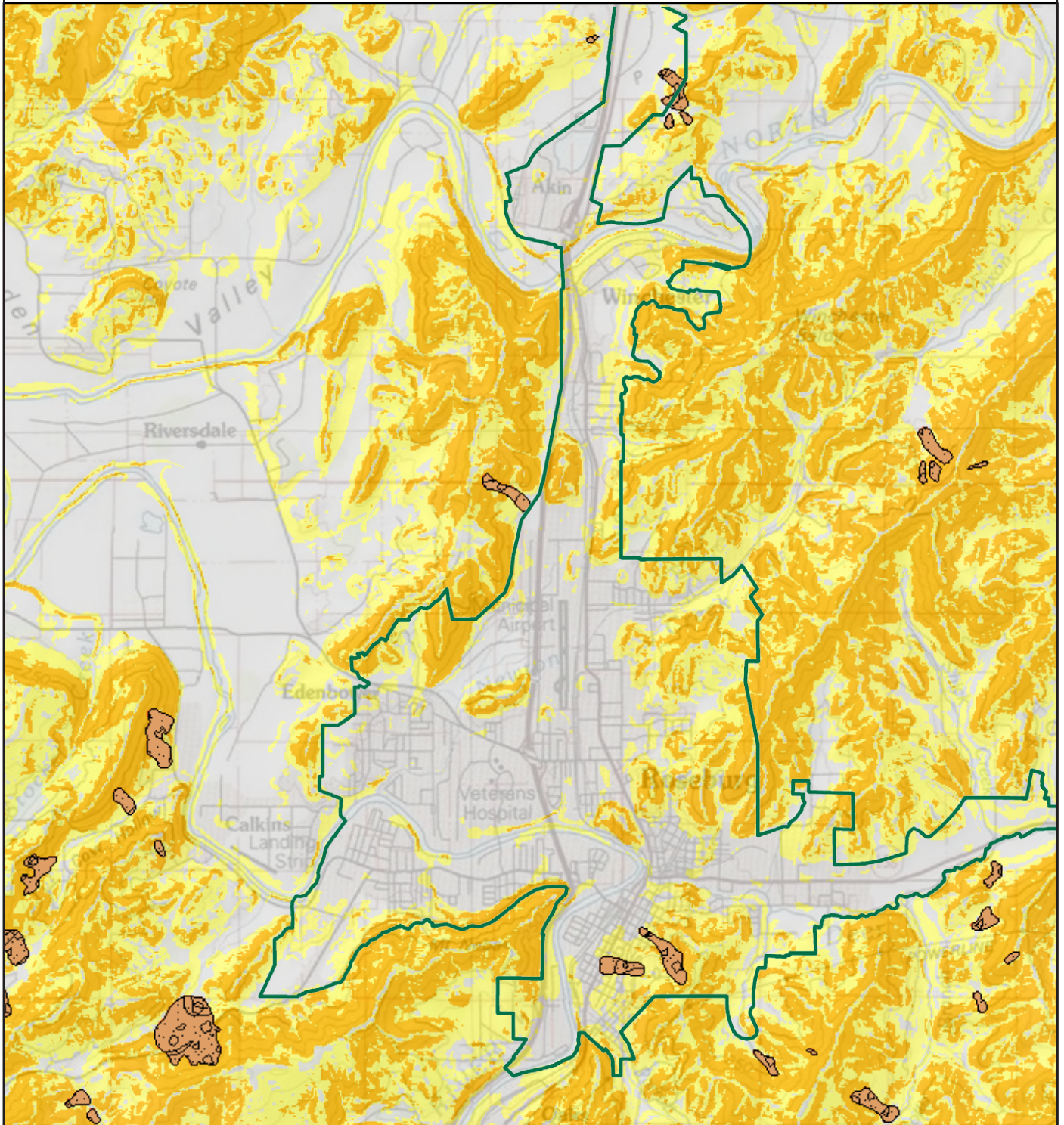
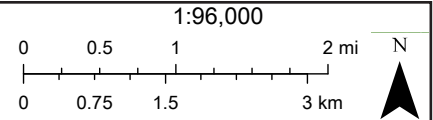


- Excluded Lands
- Urban Growth Boundary
- Farm and Forest Zoning
- Rural Residential Zoning
- Com./Ind. Exception Areas
- Public Reserve Zoning



**City of Roseburg
Urban Growth
Boundary Exchange**

**SLIDO: Landslide
Susceptibility**



Regional Landslide Susceptibility (scale at 1:500,000)



C. FINAL PRELIMINARY STUDY AREA (OAR 660-024-0065)

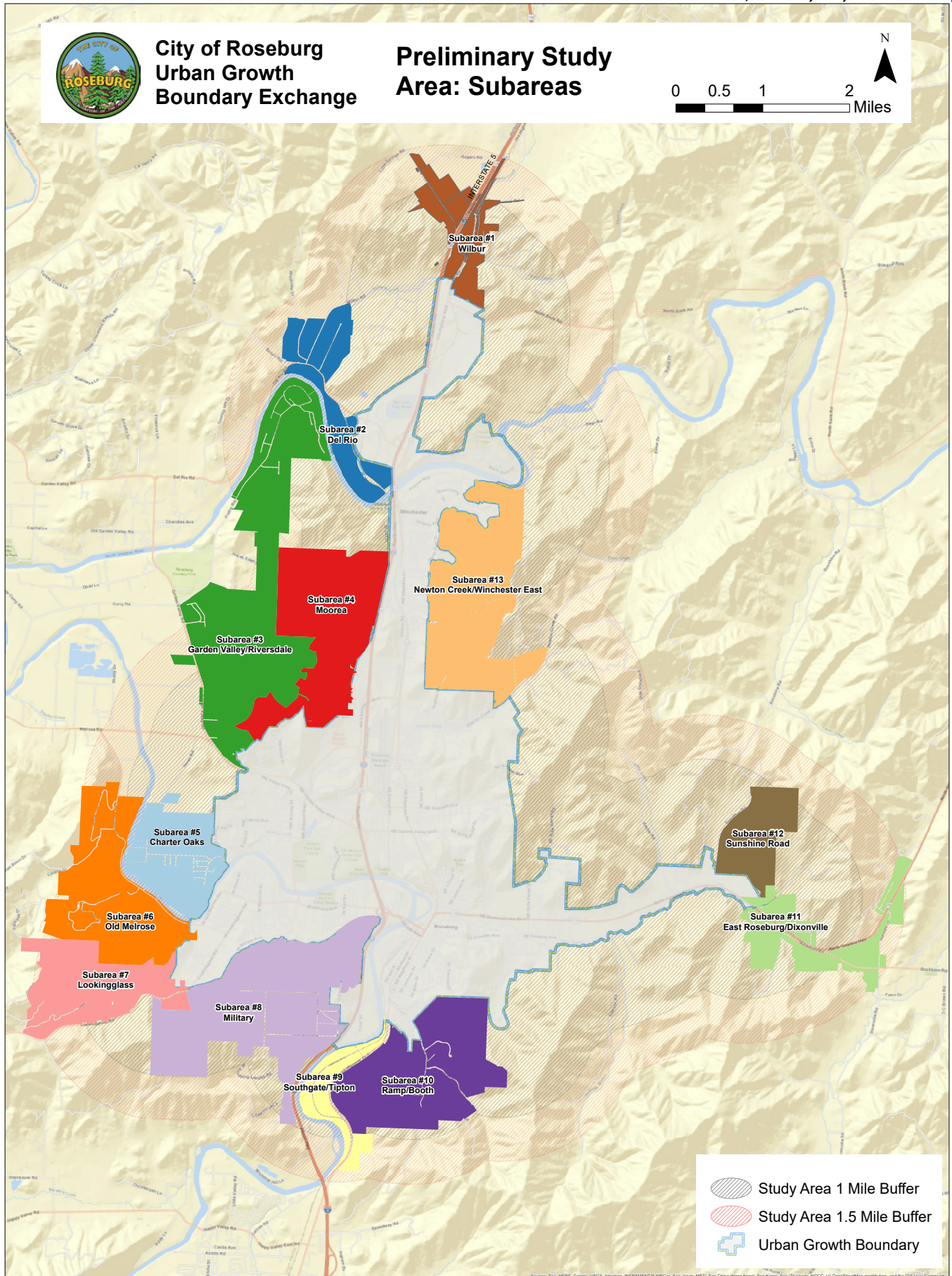
The remaining lands that have not been removed from consideration make up the City's Preliminary Study Area and have been broken down into individual subareas based on topography, practical access and dividing features (i.e. road, rivers, etc.). The lands within these subareas are approximately 12,194 acres. In accordance with 660-024-0065(5), this Preliminary Study Area is at least twice the amount of land needed.

The subarea lands were determined and grouped because they are within the 1.5 mile "buffer" area. Consideration was given to the existing natural features that divide the areas as well as the location of exception lands within the buffer. The existing natural features that divide the listed subareas include the rivers and ridges present in the natural landscape of the region, including the North Umpqua River, South Umpqua River, Winchester Baldy peak, Mount Nebo, Lookingglass Hill, and other naturally occurring hills and physical barriers. The subareas area listed and briefly described within Table 8 and shown within Exhibit 17.

Table 8, General descriptions of subarea locations.

Study Subarea	Location Description (see Exhibit 17)	Size (acres)
#1 – Wilbur	Directly North of the UGB. Contains lands north of Wilbur generally along Old Hwy 99 N, I-5 and Oak Hill Road.	591±
#2 – Del Rio Road	Land along Del Rio Road and the North Umpqua River. Also include exception areas near Wilbur, Westview and Clearwater Roads.	548±
#3 – Garden Valley / Riversdale	Lands west of Roseburg and west of Moorea ridge along Garden Valley Road to Riversdale including lands along Fisher Road.	1,910±
#4 – Moorea Drive	Lands accessed by Darley/Moorea Drive and Amanda Street.	1,217±
#5 – Charter Oaks	Lands directly west of Loma Vista accessed by Troost/Harlan Street and Charter Oaks Drive. Also, some lands at the southern extent of Jones Road.	480±
#6 – Old Melrose Road	Lands along the south and west sides of Old Melrose Road, include those lands between Old Melrose Road and the South Umpqua River .	1,117±

Study Subarea	Location Description (see Exhibit 17)	Size (acres)
#7 – Lookingglass Road	Lands directly southwest of the UGB along Lookingglass Road including the large area of exception lands within the Diamond Heights Subdivision area.	811±
#8 – Military Road	Lands directly south of the UGB along Military Road including the exception lands adjacent to I-5 near the Douglas County Landfill.	1,675±
#9 – Southgate / Tipton Road	Lands south of the UGB between Hwy 99 South and the South Umpqua River including the exception lands along Tipton Road.	263±
#10 – Booth / Ramp Roads	Lands south of the UGB, east of Hwy 99 South and those lands accessed toward the end of Booth Road and Sharon Avenue.	1,214±
#11 – East Roseburg / Dixonville	Lands east of the UGB along Buckhorn/Dixonville Road and Hwy 138. Also includes the exception lands along the east side of Sunshine Road.	563±
#12 – Sunshine Road	Lands along the east side of Sunshine Road, directly north of Sunshine Park.	480±
#13 – Newton Creek / Winchester East	Lands north of Newton Creek Road and Hughes Street east of Winchester continuing north to the North Umpqua River.	1,340±



D. EXCLUSION OF UNSUITABLE LAND FROM THE PRELIMINARY STUDY AREA

With the preliminary study area established and containing the 13 subareas listed above, the development constraints exclusion criteria contained within OAR 660-024-0065(4 & 7) were applied to the subareas listed within Table 8 to determine subareas that may be excluded from evaluation based on the following criteria.

(4) The city may exclude land from the preliminary study area if it determines that:

(a) Based on the standards in section (7) of this rule, it is impracticable to provide necessary public facilities or services to the land;

(b) The land is subject to significant development hazards, due to a risk of:

(A) Landslides: The land consists of a landslide deposit or scarp flank that is described and mapped on the Statewide Landslide Information Database for Oregon (SLIDO) Release 3.2 Geodatabase published by the Oregon Department of Geology and Mineral Industries (DOGAMI) December 2014, provided that the deposit or scarp flank in the data source is mapped at a scale of 1:40,000 or finer. If the owner of a lot or parcel provides the city with a site-specific analysis by a certified engineering geologist demonstrating that development of the property would not be subject to significant landslide risk, the city may not exclude the lot or parcel under this paragraph;

(B) Flooding, including inundation during storm surges: the land is within the Special Flood Hazard Area (SFHA) identified on the applicable Flood Insurance Rate Map (FIRM);

(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. 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.

Table 9 below describes any lands that are deemed unsuitable for urban development based on criteria contained within OAR 660-024-0065, and describes why the specific subarea is being removed from consideration. These subareas excluded from the Preliminary Study Area will not be considered further. Generally, these are areas that cannot be reasonably serviced with public facilities, are subject to significant natural hazards, such as landslide deposits, are flood prone areas as mapped by the NFIP, and contain steep slopes (greater than 25%).

Removal of lands from the Preliminary Study Area is justified under OAR 660-024-0065(4)(a) relating to the impracticability to provide necessary public facilities or services to the land. The lands removed for this reason are isolated from existing service networks by physical and topographical impediments, such that it is impractical to provide the necessary facilities or services to that land because they contain physical impediments to service provisions. The topographic features would not create adequate development opportunity to occur to meet the city’s housing needs, and the cost of extending the facilities and services to these excluded areas would be cost-prohibitive. This justification to remove these lands are permitted under the provisions of OAR 660-024-0065(7)(b), and (c).

Significant development hazard constraints have been mapped and demonstrated in Exhibit 18. Subareas that have been excluded from consideration based on the constraints shown in Exhibit 18 are listed within Table 9. These include lands which meet various criteria to make them unsuitable for urban development. The justification to remove these lands from the Preliminary Study Area is permitted under the provisions of OAR 660-024-0065(4)(b)(A-B).

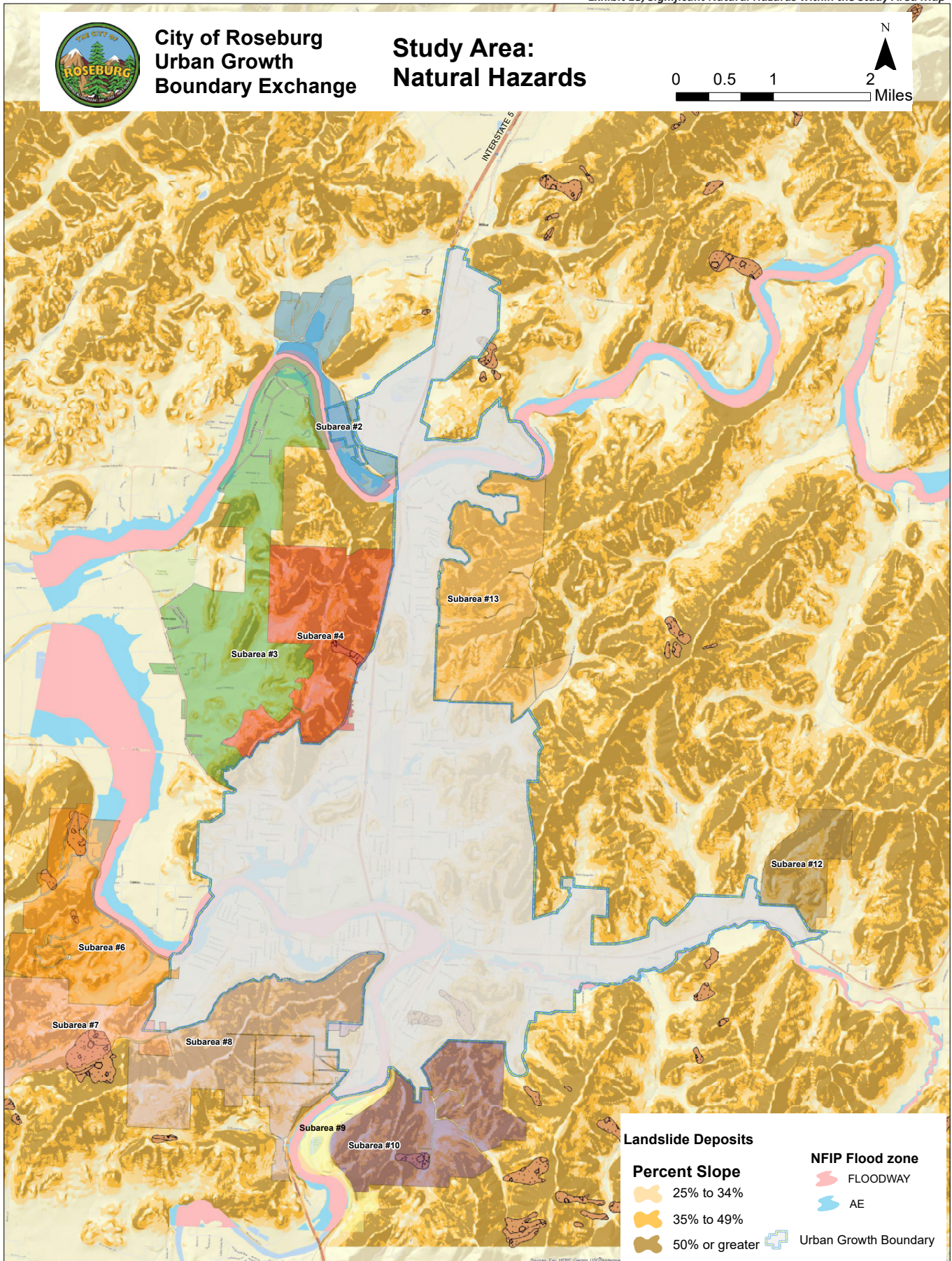
Exhibit 18 shows the landslide deposits, scarp flank, and shows that a significant portion of the areas excluded from the Preliminary Study Area are mapped with moderate and high landslide susceptibility. The exhibit is populated with data from the Statewide Landslide Information Database for Oregon (SLIDO) Geodatabase published by the Oregon Department of Geology and Mineral Industries (DOGAMI). While the provisions under 660-024-0065(4)(b)(A) only identifies scarp flank and deposits and does not specifically include moderate and high landslide susceptibility as a consideration, the City finds that it is an important area of concern when deciding what areas of the Preliminary Study Area to conduct further analysis on.

Table 9, Summary of Study Subareas Excluded by OAR 660-024-0065(4 & 7)

Study Subarea	Notes Regarding Exclusion	Size (acres)
#2 – Del Rio	The majority of the land in the Del Rio Subarea is constrained from any level of urban redevelopment. This is a result of the land's proximity to the North Umpqua River on the south end of the subarea and Del Rio Road on the north end. Also, much of the land adjacent to the existing UGB is already committed and zoned for industrial or public use including the lands along the south side of Old Del Rio Road. The majority of the remaining land along the Wilbur/Clearwater/Westview roads is physically separated from urban infrastructure by the prominent ridgeline directly north of Del Rio Road and west of I-5. Any extension of urban services would have to extend out Del Rio Road to serve all areas.	548±
#3 – Garden Valley/ Riversdale	Physically separated from the northern portion of the existing UGB by the North Umpqua River, with a ridgeline that is oriented north-south along I-5 that prevents a contiguous boundary. The ridgeline is near the Moorehouse Woods area and the steep topography prohibits an urban level of services and access to crossing the ridge. The only way to access this area is by taking Garden Valley Road west out of the city then heading north to access the lands from the west.	1,910±
#4 – Moorea Drive	These lands are generally too steep to provide urban services and result in urban level of development. The subarea consists of 1,217 acres of which 1,114 acres is land containing slopes 25% or greater resulting in over 90% of the subarea having slopes 25% or greater.	1,217±
#6 – Old Melrose Road	While this subarea is the closest subarea to Roseburg's sewage treatment plant, the topography of the subarea is generally too steep to support any reasonable level of public infrastructure and urban development. The subarea consists of 1,117 acres of which 856 acres is land containing slopes 25% or greater resulting in over 77% of the subarea having slopes 25% or greater.	1,117±

Study Subarea	Notes Regarding Exclusion	Size (acres)
#7 – Lookingglass Road	Similar to the Old Melrose Road Subarea, the land along Lookingglass is in fairly close proximity to urban services. However, the land within the subarea is generally too steep to support urban services and development. The subarea consists of 811 acres of which 694 acres is land containing slopes 25% or greater resulting in over 86% of the subarea having slopes 25% or greater. It should be noted that approximately 40 acres of this subarea did not contain accurate slope data and therefore was not considered within the overall percentage of slopes 25% or greater. It is likely that the percentage is higher, closer to 90%.	811±
#8 – Military Road	Military Road is another subarea predominately made up of areas too steep to support urban infrastructure and development. The subarea consists of 1,675 acres of which 1,541 acres is land containing slopes 25% or greater resulting in over 92% of the subarea having slopes 25% or greater.	1,675±
#9– Southgate/ Tipton Road	Lands south of the UGB between Hwy 99 South and the South Umpqua River including the exception lands along Tipton Road. This area is physically separated from the southern end of the city by a steep hillside that abuts the floodway of the South Umpqua River, creating a topographical bottleneck. The area is constrained by the floodway and the steep slopes that surround it making the remaining developable area too narrow. Much of the remaining developable land is committed to commercial/industrial use.	263±
#10– Booth/ Ramp Roads	This area contains lands at the end of SE Sharon Avenue and Booth Road, which both act as logical extensions of the adjacent neighborhoods inside the city. Unfortunately, these areas contain far too much slope constrained land to urbanize. The subarea consists of 1,214 acres of which 1,118 acres is land containing slopes 25% or greater resulting in over 92% of the subarea having slopes 25% or greater.	1,214±

Study Subarea	Notes Regarding Exclusion	Size (acres)
#12– Sunshine Road	From the perspective of proximity to city services and existing development patterns, the land within this subarea could be a potentially efficient location for consideration of the UGB amendment. However, this subarea is significantly constrained by slopes and as a result is not being considered for inclusion into the UGB. The subarea consists of approximately 449 acres of which 424 acres is land containing slopes 25% or greater resulting in nearly 95% of the subarea having slopes 25% or greater.	480±
#13– Newton Creek/ Winchester East	This subarea is one of the most slope constrained. These lands lie along the east border of the UGB, the whole length from the intersection of Edenbower Blvd. and Stephens Street north to the North Umpqua River. Some rural residential development has been approved within this area, such as Winchester Ridge. However, such development has been heavily constrained by slopes, which is evident in the amount of vacant lots still present within the subdivision. This subarea consists of 1,340 acres of which 1,254 acres is land containing slopes 25% or greater resulting in over 94% of the subarea having slopes 25% or greater.	1,340±



Similar to the justification for why the two tracts of land (Atkinson & Serafin) are proposed for removal from the UGB, seven out of the ten subareas listed within Table 9 are heavily constrained by slope. These subareas heavily constrained by slope (subareas: 4, 6, 7, 8, 10, 12 and 13) will now be removed from the preliminary study area. In accordance with OAR 660-024-0065 (4)(a), these lands have been excluded on the basis of being impractical to provide necessary public facilities or services to the land due to the existing slope. The provisions of 660-024-0065 (7)(b), and (c) are used to exclude these subareas. An analysis of the land showed that on average the lands within these subareas show that 89% of the land has constraints with slopes of 25% or greater. This causes significant barriers to development, which is evident when considering the amount of vacant land within the study areas that is currently zoned with County zoning for rural residential development, but has not developed even under the housing market pressures currently facing Roseburg and demonstrated in the HNA.

Slope constraints are the primary reason for the removal. However, the removal of these subareas from consideration is bolstered by findings of the land being isolated, which is also described as impracticable to provide necessary public facilities as described in subsection (b) of 660-024-0065(7). Due to the subareas being isolated from the existing service networks by physical and topographical impediments, it is not practical to provide the necessary facilities to facilitate the development that would come with land being added into the UGB in these areas. Excluding such land is supported by subsection 660-024-0065(7)(b)(A), which has been discussed above and relates to the likely amount of land that would be developed, has not had a pattern of development consistent with the current zoning of the lands, and would not support development with the proposed zoning of the future lands to be brought into the UGB. 660-024-0065(7)(b)(B) also supports this finding, given that the topographical and physical constraints exist, the likely cost of facilities and services needed to support development would be much higher compared with other subareas due to the topographical and physical constraints. 660-024-0065(7)(b)(C) supports this finding as well. The City has had multiple interactions with property owners of slope constrained land on the periphery of Roseburg, including the property owners of the two sites proposed to be removed from the UGB. The overwhelming consensus of the interactions with the properties is an inability to physically provide urban services, an inability to build at urban densities while offsetting the costs of infrastructure improvements, or a combination of the two. With this finding, and the support of subsection (c), which clarifies that the descriptions of “impediments to service provision” may include, but are not limited to the topographic features, the preliminary study areas (4, 6, 7, 8, 10, 12 and 13) have been removed from the study area.

The primary justification for excluding the remaining three subareas does not relate to slope specifically, but are related to other factors causing the subareas to be impracticable to provide necessary public facilities or services.

Subareas #2 – Del Rio, and #3 – Garden Valley/Riversdale within Table 9 are being excluded as a result of their geographic position in relation to the city and their topographic separation. If included as part of the exchange area, this would result in an inefficient and impractical urbanization into the city. Lastly, Subarea #9 was excluded due to existing bottleneck constraints and topographic separation. These three subarea exclusions and justification of their removal from consideration are discussed in further detail below:

a) Subarea #2 – Del Rio

This subarea has a number of barriers to urbanization that disqualify it from consideration under OAR 660-024-0065. Exhibit 19 provides an overview of the geographic and other constraints for this subarea. Firstly, the portion of the subarea directly adjacent to the UGB is zoned and committed to industrial and public uses. The land adjacent to I-5 is the Roseburg Rod and Gun Club property. Additionally, all the lands along the river until the intersection of Akin Ln. and Old Del Rio Road are industrial lands. This portion of the subarea makes up about 190 acres, which for purposes of the proposed UGB swap, would result in the majority if not all of the lands brought into the UGB having an industrial land use designation rather than a residential designation, creating a deficiency in the amount of residential buildable land within the UGB, which would not be supported by OAR 660-024-0070(3)(a)(A).

In regards to future services, the subarea contains a number of issues preventing reasonable accommodation for extension into the developable portions of the subarea. As shown on Exhibit 19 below, the closest water and sewer services are physically separated from the subarea by both natural and manmade barriers. The extension of City water services would require crossing not only the North Umpqua River, I-5, and the railroad. Sewer runs north along Old Hwy 99 and would need to be extended from the intersection of Del Rio Road and Old Hwy 99. All utilities would have to run along Del Rio Road because of a topographic bottleneck between the North Umpqua River and a large ridgeline along the north side of Del Rio Road directly west of the intersection of Del Rio and Old Del Rio Road. As mentioned previously, the eastern portion of the subarea, which happens to be closest to existing services, is essentially undevelopable at any reasonable residential density. The portion of the subarea shaded by slashed lines within Exhibit 19 is zoned and utilized for non-residential land uses. Further west along Del Rio Road within the subarea, the only lands are those situated between the river and Del Rio Road, which for purposes of additional residential development are rendered undevelopable as a result of the special flood hazard area. These issues and constraints would significantly limit the eastern portion of the subarea, closest to the existing UGB and access to public services. The only real land available for practical development begins on the western side of the subarea upon reaching the intersection of Clearwater Drive and Del Rio Road. However, development at this location would require approximately 1.5 miles of main line extension along Del Rio Road for both water and sewer services before reaching that portion of the subarea. In addition, because the subarea is so far removed from the core of the City, emergency response times for both fire and police protection would be compromised and appropriate response times could only be facilitated through the construction of additional fire and police stations in the Winchester area. This renders Subarea 2 impractical to provide future services and therefore, the City is eliminating the subarea from consideration, pursuant to OAR 660-024-0065(7)(b), due to its isolated location from the City's public infrastructure networks.

Exhibit 19, Constraints within Subarea #2 (Del Rio) Map



b) Subarea #3 – Garden Valley/Riversdale

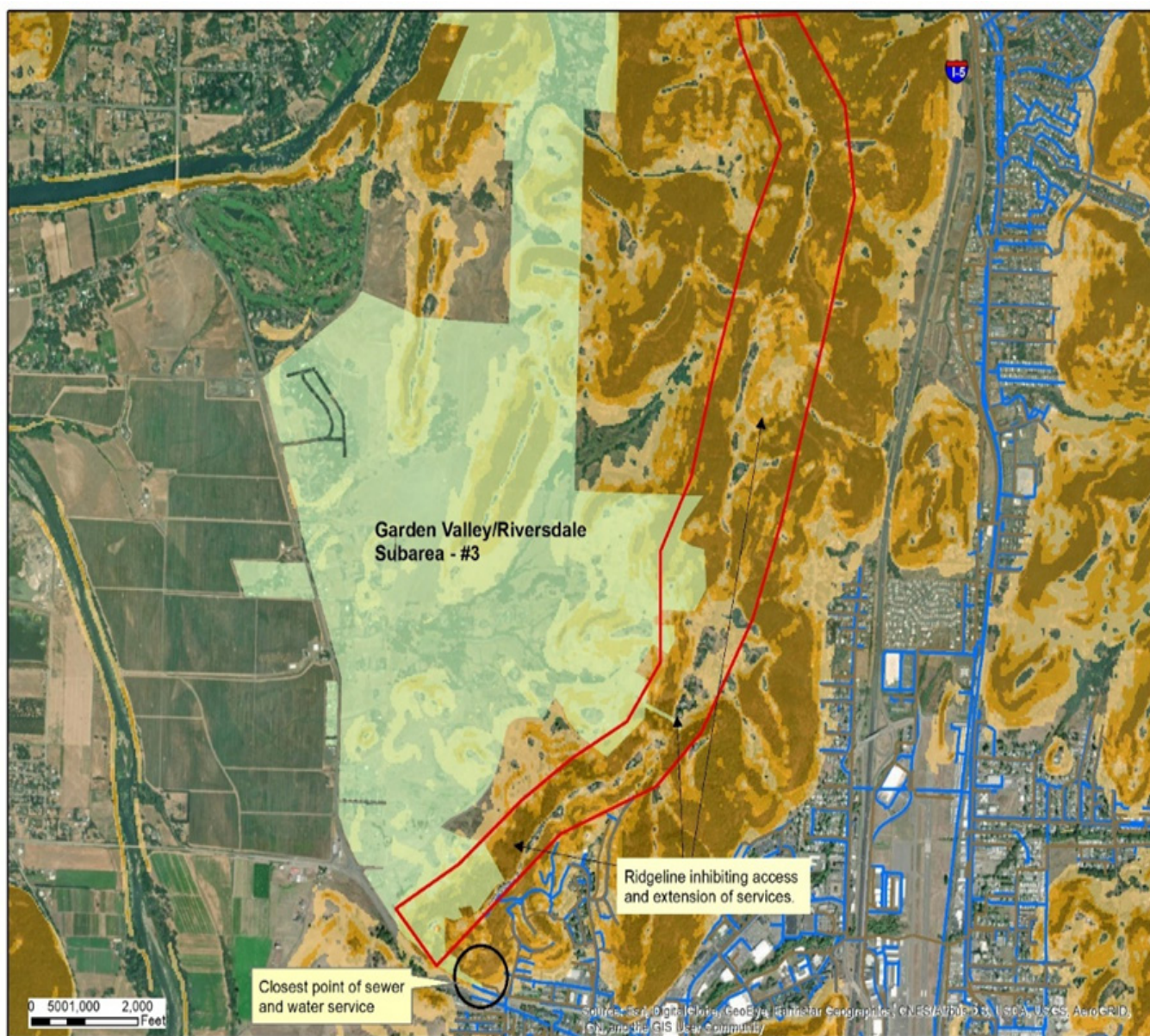
Similar to the Del Rio subarea, the Garden Valley/Riversdale subarea does contain a significant amount of developable/re-developable exception land zoned for residential use. Exchanging this area would also be inconsistent with OAR 660-024-0070(3)(a)(A). As depicted within Exhibit 20, the subarea is topographically divided by a significant ridgeline running north and south the entire length of the subarea from Garden Valley Road north to the North Umpqua River. This ridgeline, to a degree, has been developed with rural residential development accessed from Darley Drive, Moorea Drive and at the most northern extent of the subarea at Fisher Road. While technically access and services to the southern portions of the subarea immediately along Garden Valley Road could be achieved by extending utilities out Garden Valley Road, the ridgeline eliminates any future potential for connectivity of roads, water and sewer services to any point other than Garden Valley Road.

The northern portion of the Garden Valley/Riversdale subarea is not a feasible location for the connection of roads, water and sewer services, as they would have to be extended far from Garden Valley road via Fisher Road, or across the North Umpqua river near the southern portion of the Del Rio subarea. The closest location for services to serve the north portion of the Garden Valley/Riversdale subarea is across the river and the railroad, or by crossing the ridgeline, both of which are cost prohibitive and impracticable given the alternative exchange areas. Using the Garden Valley Road to Fisher Road route for the connection of water and sewer services to the north portion of this subarea would also be cost prohibitive and impractical due to the distance that the extensions would need to be from the current point of service.

The Garden Valley/Riversdale subarea, especially the north portion is also surrounded by areas that are prone to natural hazards. As shown in Exhibit 18, the north portion includes areas that are within the Floodway and the National Flood Insurance Program AE Zone, specifically Fisher Road, which would be the main road that would connect services to the area. Similar to the Del Rio subarea, the buildable areas of the southern portion of the Garden Valley/Riversdale subarea are far enough away from the city center that emergency call response times would be compromised.

Given these constraints, the City is eliminating the subarea from consideration, pursuant to OAR 660-024-0065(7)(b). The elimination of this subarea is based on a number of different factors all related to the physical separation of this subarea from the rest of the city based on the location of the ridge. Public infrastructure networks including utilities and roads would only have access via Garden Valley Road. Any future connectivity with the remaining portions of the city would be eliminated by the ridge.

Exhibit 20, Constraints within Subarea #3 (Garden Valley/Riversdale) Map



c) Subarea #9 – Southgate/Tipton Road

The land within Subarea 9 along Hwy 99 south of the UGB is physically separated from the southern extent of urban development by a steep hillside that abuts the floodway of the South Umpqua River. With the exception of the highway, this area consists of steep hillside and in some cases vertical rock faces that separate the road from the adjacent lands to the east, as shown in Exhibit 21. To the west the land slopes off into the floodway of the South Umpqua River. This topographic “bottleneck” runs south along Hwy 99 for approximately a half mile until the lands to the west of the highway flatten out and provide some relief from the narrow corridor shown in Exhibits 20 and 21. Additionally, the developable portions of the subarea are predominately committed to industrial/commercial development and much of the land along Tipton Road is constrained by the South Umpqua River Floodway. Given the topographic constraints, amount of floodway in the subarea, the subarea is being removed with justification of OAR 660-024-0067(7)(b) and OAR 660-024-0067(7)(c)(B-C). Also due to the existing zoning designation, the City finds that the land would not be suitable for the exchange to meet the requirements for the exchange area to have the specific type of residential need that is substantially equivalent to the amount of buildable residential land removed, pursuant to OAR 660-024-0070(3)(a)(A).

Exhibit 21, Image of HWY 99 within the subarea that illustrates the “bottleneck” effect

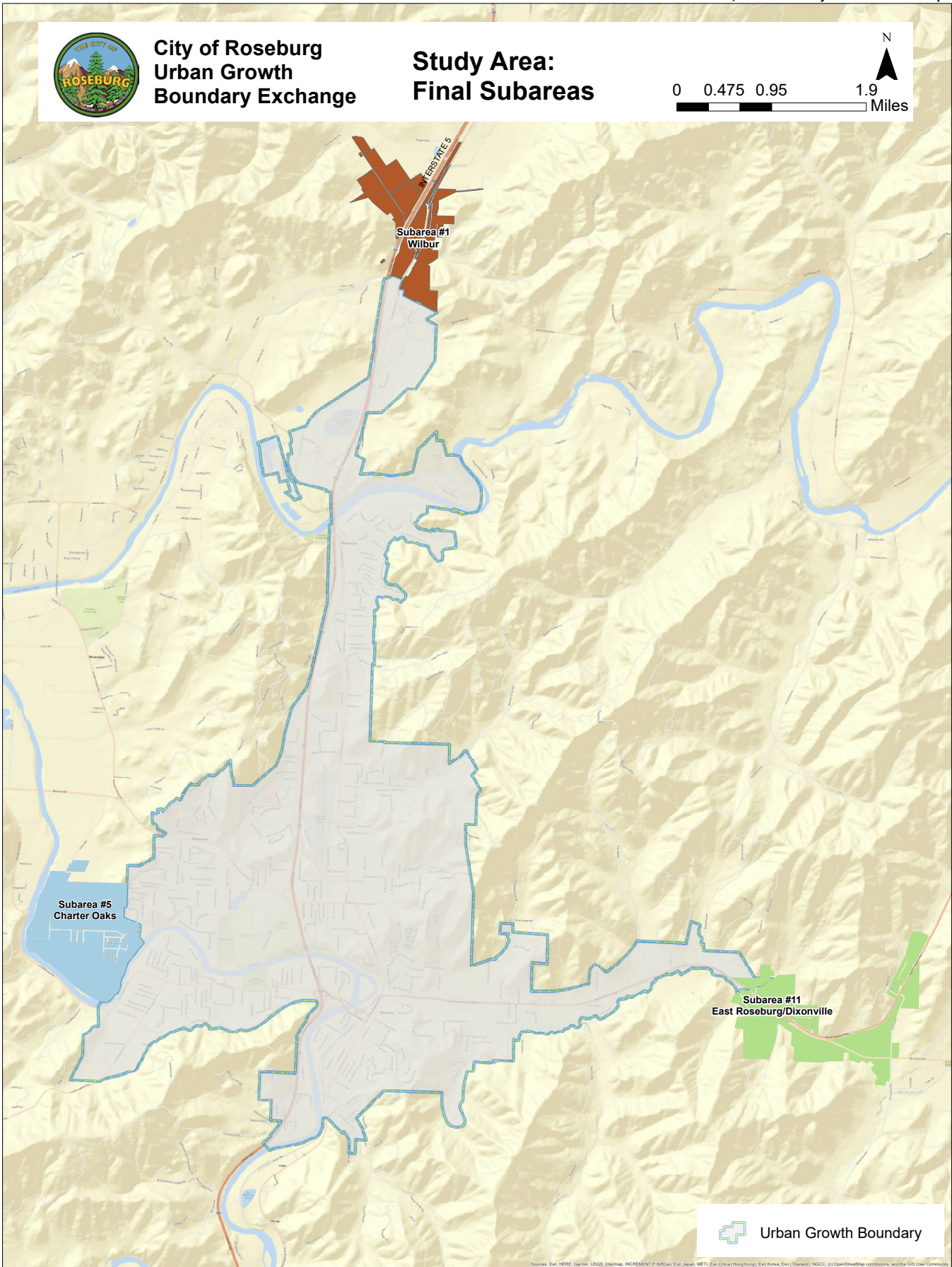




Exhibit 22, Constraints within Subarea #9 (Southgate / Tipton Rd) Map

After excluding these ten subareas from the preliminary study area based on evaluations of non-priority lands, natural hazards, and the efficient extension of public facilities and services, the City finds that three subareas remain for the proposed exchange area. These three subareas make up the “Study Area”, which have been further evaluated and analyzed to find the most appropriate location for the exchange area.

The Final Study areas contains the following subareas: Subarea #1 (Wilbur), Subarea #5 (Charter Oaks), and Subarea #11 (East Roseburg/Dixonville), depicted in Exhibit 23.



E. ANALYSIS OF SUBAREAS WITHIN THE STUDY AREA (OAR 660-024-0067) AND GOAL 14: URBANIZATION – BOUNDARY LOCATION

To this point in the Study Area analysis the City has: 1) established Preliminary Study Area of 1.5 miles around the existing urban growth boundary in accordance with OAR 660-024-0065(1); 2) Performed an analysis to exclude unsuitable lands from the Preliminary Study Area, pursuant to OAR 660-024-0065 reducing the Preliminary Study Area slightly; and 3) Further excluded lands from the Preliminary Study Area pursuant to OAR 660-024-0065 to reach the final “Study Area”. These resulting lands are the three subareas listed within Table 10 below, that make up the final “Study Area”.

Table 10, Summary of Study Subareas included within the Final Study Area

Study Subarea	Location Description	Size (acres)
#1 – Wilbur	Directly north of the UGB. Contains lands north of Wilbur generally along Old Hwy 99 N, I-5 and Oak Hill Road.	591±
#5 – Charter Oaks	Lands directly west of Loma Vista accessed by Troost/Harlan Street and Charter Oaks Drive. Also, some lands at the southern extent of Jones Road.	480±
#11 – East Roseburg / Dixonville	Lands east of the UGB along Buckhorn/Dixonville Road and Hwy 138. Also includes the exception lands along the east side of Sunshine Road.	563±

Prior to selecting one of these three subareas for inclusion into the UGB through this exchange, the City must apply prioritization criteria from OAR 660-024-0067 (known henceforth as the “Prioritization Analysis”) and the Boundary Location factors contained in Goal 14 (“Goal 14 Location Factors”). The Prioritization Analysis and Goal 14 Location Factors are applied to each and the final three subareas. This will ensure consistency with the requirements of the state’s prioritization for land inclusion within Urban Growth Boundaries (OAR 660-024-0067) and also ensure that the land accommodates the need resulting from the exchange and reflects the most efficient and orderly urbanization land based on Goal 14 factors.

The boundaries of the subareas described in this report are based on previous advice from DLCD staff, and those subareas have been used to conduct this entire process of the UGB Exchange. Each of the final subareas considered for the exchange (Wilbur, Charter Oaks, and East Roseburg/Dixonville) is grouped together in a way that includes a mix of both high-value farmland and other lands (exception lands and other non-high-value resource lands), which is demonstrated in greater detail further in this report. With this mix of lands, the City determined that a scoring system would be the best way to meet the intent of the Prioritization Analysis. A score of 1, 2, or 3 was given to the subareas based on the percentage of high-value farmland within that subarea, with 1 being the subarea the best meets the prioritization criteria. The high-value farmland scores are shown in the Table 12.

For a scoring example, and as demonstrated further in this report, Charter Oaks has the highest percentage of high-value farmland out of the three subareas, and the appropriate score of (3) was given for this Prioritization Analysis. The score are then combined with the other prioritization scores to determine a ranking of the subareas that best meets the prioritization requirements of OAR 660-024-0067.

A ranking for the Prioritization Analysis is determined by the scores for the following:

- Amount of Nonresource and Resource lands (Table 11),
- Amount of high-value farmland (Table 12),
- Amount of higher class soil types compared to soils of lower class (Table 13).

The scores were combined to determine a ranking score for the Prioritization Analysis for inclusion into the UGB, which is shown in Table 15.

The final determination for which subarea is to be chosen for the Exchange Area and brought into the UGB was based on this scores in Table 15 combined with the Goal 14 Location Factors (1-4) scores.

This final combined score with both the Prioritization Analysis final score and the Goal 14 Location Factor final score, which determines the subarea chosen for the exchange is found later in this report in Table 20.

With two separate criteria (Prioritization Analysis and Goal 14 Location Factors) used to determine which subarea is most appropriate for the exchange, and with advice given by DLCD, the City determined that this scoring system was the best approach.

The following is the Prioritization Analysis for the three subareas.

I. EVALUATION OF LAND IN THE STUDY AREA FOR INCLUSION IN THE UGB; PRIORITIES

The priorities for land inclusion are as follows (OAR 660-024-0067):

(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.

For evaluation of the priorities for land inclusion contained within OAR 660-024-0067, the three subareas: 1) Wilbur; 5) Charter Oaks; 11) Roseburg East/Dixonville, were cross referenced by county zoning designation, resource and nonresource lands, amount of High-Value Farmland, and the Natural Resource Conservation (NRCS) Non-Irrigated Capability Class and Irrigated Capability Class as shown in tables 11, 12, and 13.

By identifying the county zoning classification, the analysis separates the third and fourth priorities for bringing land into the UGB outlined in 660-0024-0067 (c) & (d) and the appropriate scoring as described above was given. The second priority, (b), is not relevant to this proposal, as there are no marginal lands as described under ORS 197.241 (1991) in the subject study area. After discussing the priority for inclusion in this section, the subareas will be ranked to help determine which subarea is selected for the UGB exchange area. Goal 14 Location Factors will also rank each of the subareas later in this report.

The three subareas have existing Douglas County zoning. All three subareas have a mix of both resource lands and nonresource lands. The Wilbur subarea and the Roseburg East/Dixonville subarea both have a mix of lands zoned as Rural Residential (RR), Rural commercial/industrial (ME, M3), Farm and Forest (FF) and Public Reserve (PR). The Charter Oaks subarea has only Rural Residential (RR) and Farm and Forest (FF) zoning designations, and contains no rural commercial/industrial/public reserve. These zoning designations for the subareas are best demonstrated in Exhibits 26-28.

To best compare the subareas to one another, the Rural Residential zoning, Public Reserve, and Rural Commercial/Industrial zoning are considered together as nonresource lands. The areas zoned Farm and Forest (FF), EFU-Grazing (FG), and Agriculture and Woodlot (AW) are considered together as resource lands. Table 11

demonstrates the relative differences in the subareas when comparing nonresource lands and resource lands. The Roseburg East/Dixonville subarea has the lowest amount of resource lands, and the Wilbur and Charter Oaks subarea have similar amounts of resource lands by percentage of lands in the subarea. This information is relevant for the 660-024-0067 First Priority scoring.

First Priority: None of the subareas identified contain urban reserves. Because all of the subareas contain a variety of nonresource lands, exception lands, and resource lands, this category is not a clear indicator of which subarea has the highest priority over the others, but does contribute to the First Priority score for each subarea. The comparison of these lands and the acreage and percentage of nonresource and resource lands in the subarea is shown in Table 11. They have been scored to give the appropriate lower point (1) to the area given the first priority criteria.

Roseburg East/Dixonville has the highest amount of nonresource land, and was given the appropriate score of 1 to reflect that it has the highest priority with this criteria. As described earlier in this report, this score will be combined with the other priority scores for inclusion and the Goal 14 Location Factor scores to determine the most suitable location for the exchange.

Table 11, Summary of Final Subareas by Nonresource and Resource Zones

	Acres in Subareas by County Zoning - Resource and Nonresource and Priority (a) Score 660-024-0067(2)(a)					
	Rural Residential and Other (Nonresource)		Farm or Forest (Resource)		Total	1st Priority Score
<u>Subarea</u>	Acres	Percent	Acres	Percent	Acres	
Wilbur	195	33%	396	67%	591	3
Charter Oaks	192	40%	288	60%	480	2
Roseburg East/ Dixonville	482	85%	81	14%	563	1

As shown in Table 11, the zoning makeup of the three subareas differ dramatically. Table 11 demonstrates that the Roseburg East/Dixonville subarea is predominately made up of nonresource lands with only 14% of the land area zoned as resource lands. This high level of nonresource exception land contributes to the score that Roseburg East/Dixonville subarea gets for determining the highest priority for inclusion for this first priority score.

Second Priority: None of the subareas contain marginal land designated under ORS 197.247 (1991), therefore no lands are considered for this category, and no score is given to any of the subareas.

Third Priority: The third priority for lands to be included into the UGB are lands that are not predominantly high-value farm land or lands that are not predominantly containing prime or unique soils. This includes land designated for forest or agricultural uses in the acknowledged comprehensive plan, as well as land defined as high-value farmland in ORS 195.300. The ORS 195.300(10) definition of high-value farmland includes lands that are predominantly of prime or unique soils, as determined by United States Department of Agriculture Natural Resources Conservation Service (USDA NRCS) data, as well as other data sources that were used to run the analysis.

The City conducted an analysis of the amount of high-value farmland based on the State definitions in ORS 215.710 (1) and ORS 195.300 (10). The analysis only included resource lands. The results of the analysis finds that Roseburg East subarea has the lowest amount of high-value farmland, with the Wilbur and Charter Oaks subarea containing various levels of high-value farmland. None of the subareas are made up of predominantly high-value farmland. This is best shown in Exhibits 38-40, and demonstrated in Table 12. All definitions of high-value farmland were used to determine the results in the exhibits and table.

To the greatest extent possible the high-value farmland lands identified will be removed from consideration from the final exchange area selected.

Table 12, Summary of Final Subarea by Resource Zoning, High Value Farmland defined by ORS 215.710 (1), and High Value Farmland defined in ORS 195.300 (10)

Subarea	Resource zoning: forest or agriculture uses (percent of total subarea)	High-Value Farmland ORS 215.710 (1) of Irr* / Non-Irr / Prime or Unique Class Resource Zoned Lands (Acres)	% of Subarea	High-Value Farmland ORS 195.300 (10) of Resource Zoned Lands (Acres)	% of Subarea	Score
Wilbur	67%	0	0%	159.6	27%	2
Charter Oaks	60%	50	18%	213.1	44%	3
Roseburg East	14%	7.8	1%	27.8	5%	1

***Missing Data for Irrigated Capability Class –** The data for some contrasting soils of minor extent may not be in the database, and therefore are not considered. The criteria used in grouping the soils do not include major and generally expensive landforming that would change slope, depth, or other characteristics of the soils, nor do they include possible but unlikely major reclamation projects.

Fourth Priority: The fourth priority for inclusion into the UGB are lands that are predominately high-value farm land or lands that predominantly contain prime or unique soils. This includes land designated for agricultural uses in the acknowledged comprehensive plan, as well as land defined as high-value farmland in ORS 195.300. The definitions of high-value farmland in this statute are defined in ORS 195.300(10). As demonstrated in Table 11, all three subareas have a mix of resource and nonresource lands, and as demonstrated in Table 12, a mix of high-value farmland and other non-high-value resource lands. This is best shown in Exhibits 38-40, and demonstrated in Table 12. However, as explained in the third priority analysis, none of the three subareas are predominantly high-value farmland, and none of the subareas are predominantly made up of prime or unique farm soils, as defined by the USDA NRCS. The scoring criteria as outlined below was used to evaluate and prioritize the subareas for inclusion.

The City analyzed Soil Classification by both Irrigated and Non-Irrigated Capability class (NRCS) Web Soil Survey (WSS), which provides soil data and information produced by the National Cooperative Soil Survey. The Soil Classification analysis has been incorporated into the 660-0024-0067 findings to best inform the decision for which subarea to include as the exchange area of the UGB. Table 13 shows the results of that analysis.

Both the irrigated and non-irrigated soil capability class was considered for this analysis, in part because the irrigated capability class data was incomplete. The non-irrigated soil capability class was considered in the

evaluation due to historical patterns of water use in the area which indicates that these lands have not been irrigated. This was confirmed through conversations with the property owners. Additionally, these lands are not likely or have no possibility of being irrigated in the future because there is no available water source. For the past several years, owners in the subareas have communicated with city staff and officials that the wells on their properties have been drying out during the summer months, which indicates that the amount of water in the well would not support irrigation or for human consumption. Many of the properties in the subareas are located far from the Umpqua River, making it impractical, and in most cases impossible to obtain a water right and irrigate the property from the river.

As demonstrated in Table 13 below, all three subareas have a similar percentage of soil classes with the majority of soils in each subarea falling into the class III and IV categories. It is notable that the Roseburg East/Dixonville does contain about 59 acres of class I & II soils. However, these soils are almost entirely made up of rural residential exception lands along the south side of Deer Creek. As a result of the exception zoning, farming practices could be present in these locations, but commercial agriculture is not likely present in these areas. The soil class and zoning make up of each subarea are shown within Exhibits 24-32 at the end of this section.

Table 13, Summary of Final Subareas by Soil Class

	Acres and Percentage by Soil Class (Non-Irrigated, Resource Lands Only)							
	Class I-II		Class III-IV		Class V-VIII & Null		Total	Score
<u>Subarea</u>	Acres	Percent	Acres	Percent	Acres	Percent	Acres	
Wilbur	0	0%	237	60%	159	40%	396	3
Charter Oaks	0	0%	189	65%	99	35%	288	2
Roseburg East/ Dixonville	8	10%	44	54%	29	36%	81	1
	Acres and Percentage by Soil Class (Irrigated, Resource Lands Only)							
	Class I-II		Class III-IV		Class V-VIII & Null		Total	Score
<u>Subarea</u>	Acres	Percent	Acres	Percent	Acres	Percent	Acres	
Wilbur	0	0%	135	35%	261	65%	396	2
Charter Oaks	30	10%	73	25%	185	65%	288	3
Roseburg East/ Dixonville	8	10%	0	0%	73	90%	81	1

The soil makeup of all three subareas are relatively similar, with each subarea having 10% or less of their soils in Class I & II. Also related are the soil classifications of each subarea, as shown in Exhibits 33-35. The Wilbur subarea contains approximately 185 acres of soils with a forest productivity classification of greater than 100 cubic foot per acre per year. This subarea does contain timberland on a few larger tracts of land. More specifically, the units of land directly east of the intersection of Hwy 99 North and Shakemill Road and the lands, not directly adjacent, but south of Oak Hill Road within the subarea boundaries.

NRCS pasture productivity/animal unit per month data was also reviewed in relation to the subareas. However, none of the soil classes within the subareas contained valid data within the NRCS dataset for pasture productivity. In addition, data for the Umpqua Valley Viticulture areas were obtained and cross-referenced with the boundaries of each of the final subareas. The acreage of “Viticulture area” contained within each subarea is shown in Table 14 below. The location of the Viticulture Areas is shown in Exhibits 39-41.

Table 14, Summary of Final Subareas by Umpqua Valley Viticulture Areas

	Acres of Viticulture		
	Viticulture		Total
<u>Subarea</u>	Acres	Percent	Acres
Wilbur	177	30%	592
Charter Oaks	358	75%	480
Roseburg East/Dixonville	349	62%	563

In consideration of the zoning and soil data provided above, the Roseburg East/Dixonville subarea contains the highest percentage of committed lands zoned for rural residential use and the least amount of land designated for farm or forest uses by the Douglas County Comprehensive Plan. Both Wilbur and Charter Oaks have a similar zoning and soil make up, with Wilbur having a slightly higher percentage of resource zoned lands, but Charter Oaks having a slightly higher percentage of class III & IV soils. Additionally, the Wilbur subarea contains a few areas of potentially high value forestland based on the NRCS forest productivity data and the Charter Oaks Subarea contains the highest percentage of lands identified within the Umpqua Valley Viticulture area dataset. Forest productivity for each subarea is shown in Exhibits 36-38.

Table 15, Final Ranking for OAR 660-024-0067 Inclusion Priorities

<u>Subarea</u>	Ranking	Notes
Wilbur	2	Wilbur contains the highest percentage of resource (farm or forest) zoned land, a decent amount of high-value farmland, and some potentially commercial forestland.
Charter Oaks	3	Charter Oaks contains a decent amount of nonresource lands, and the highest percentage of class III & IV soils and some larger resource zoned parcels. This subarea also contains a high percentage of lands within the Umpqua Valley Viticulture area, and a decent amount of high-value farmland.
Roseburg East/Dixonville	1	The Dixonville area contains a large amount of nonresource exception land. It also includes the most class I & II soils, however those soils lie within exception lands that wouldn't be considered for commercial farm and forest purposes.

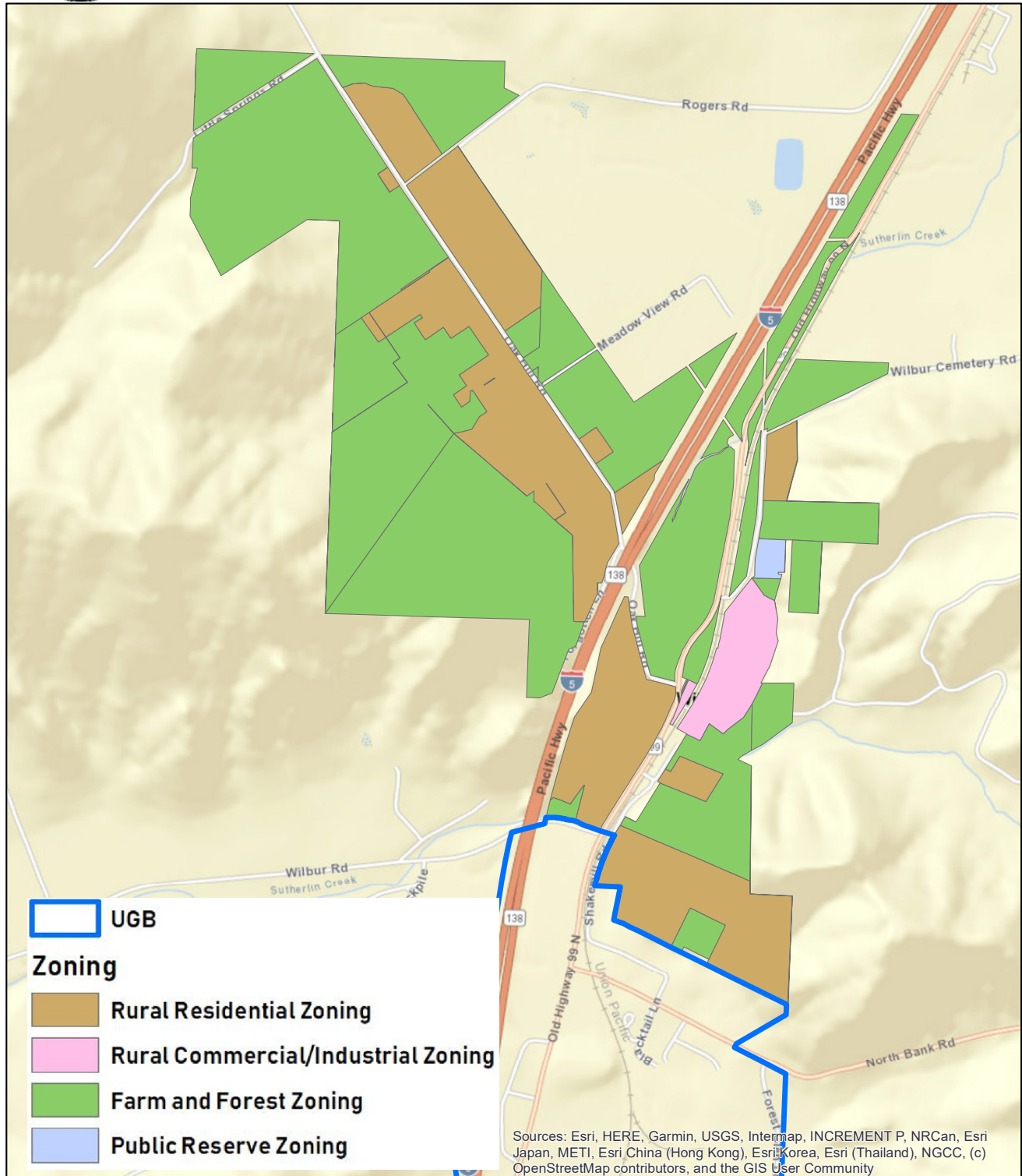
Through identifying the amount of high-value farmland, including the soil capability class and farmland classification and separating the land by zoning designation, the priorities of 660-024-0067 (2)(c) & (d) are evaluated separately, because the third priority for inclusion of land is for forest or farm land that is not predominantly high-value farm land, and the fourth priority for inclusion is for agricultural land that is predominantly high-value farmland. Although these subareas contain a mix of resource and non-resource lands, and varying amounts of high-value farmland, the areas with the highest amount of high-value farmland are given the higher score (score of 3 corresponds to highest amount of high-value farmland). For the three subareas the resource land is separated from the rural residential zoning in Table 11. The third and fourth priorities are analyzed separately primarily by the amount of high-value farmland amount in each subarea. The scores that were given in each of the above tables took this into consideration, and the subarea with more higher priority lands, was given a lower corresponding score. As noted previously, these scores will be combined with the Goal 14 Location Factor scores to determine the subarea that will be chosen for the Exchange Area.



City of Roseburg
Urban Growth
Boundary Exchange

Exhibit 24, Subarea #1 (Wilbur) Zoning Map
Subarea #1 (Wilbur)
Zoning

0 430 860 1,720 2,580 3,440 Feet



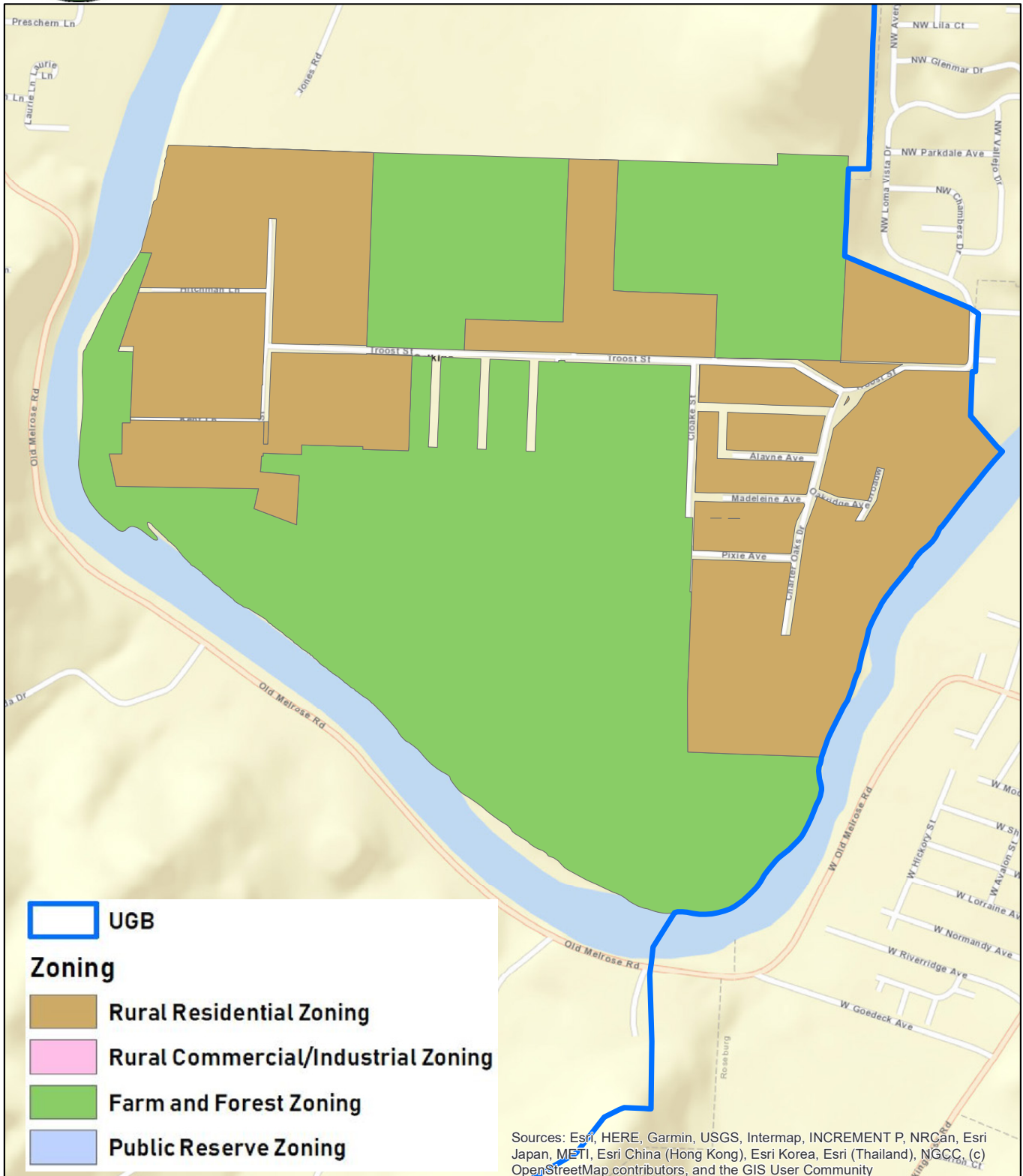


City of Roseburg
Urban Growth
Boundary Exchange

Exhibit 25, Subarea #5 (Charter Oaks) Zoning Map

Subarea #5 (Charter Oaks)
Zoning

0 287.5 575 1,150 1,725 2,300 Feet

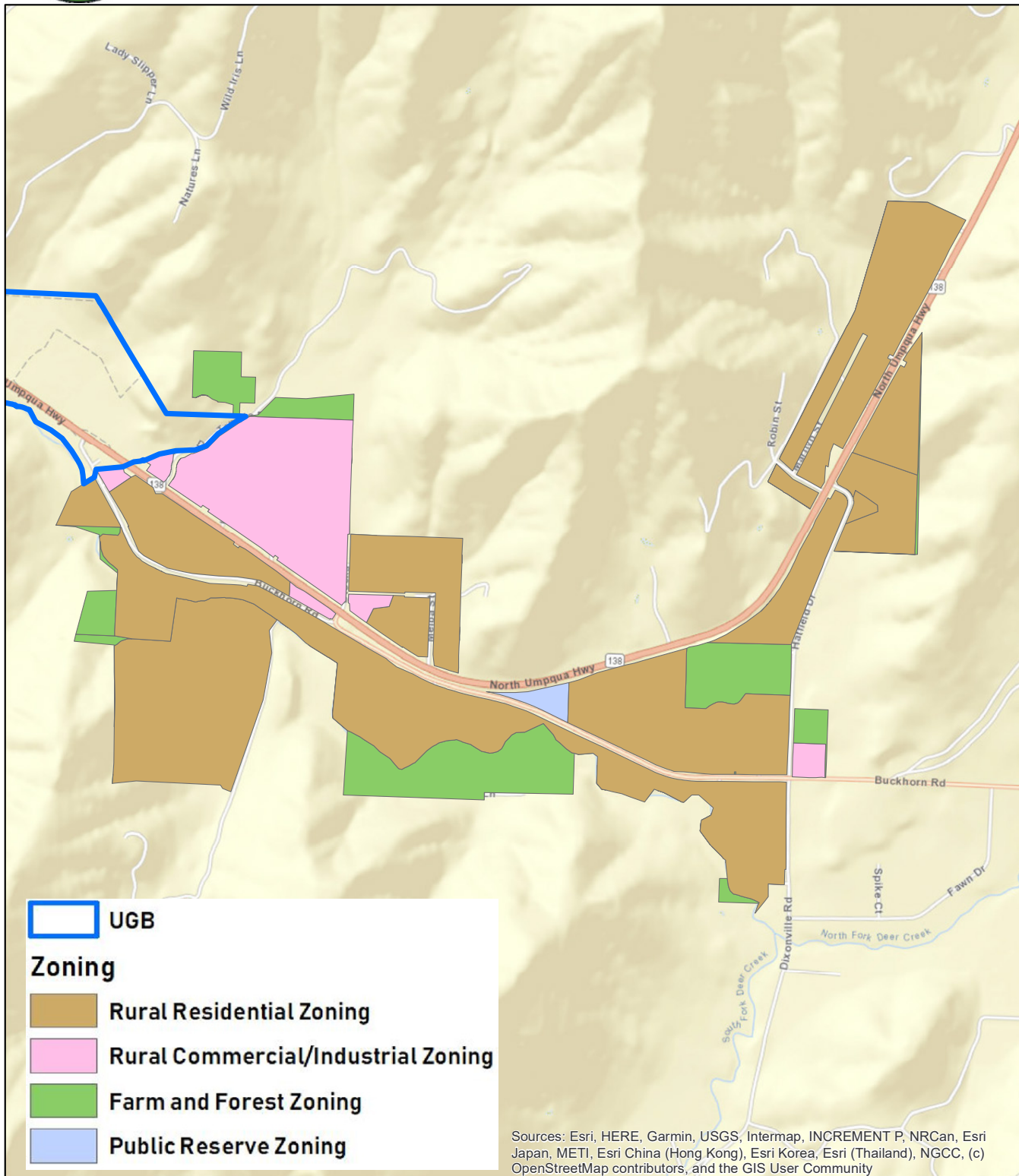




City of Roseburg
Urban Growth
Boundary Exchange

Exhibit 26, Subarea #11 (East Roseburg Dixonville) Zoning Map
Subarea #11 (East Roseburg / Dixonville)
Zoning

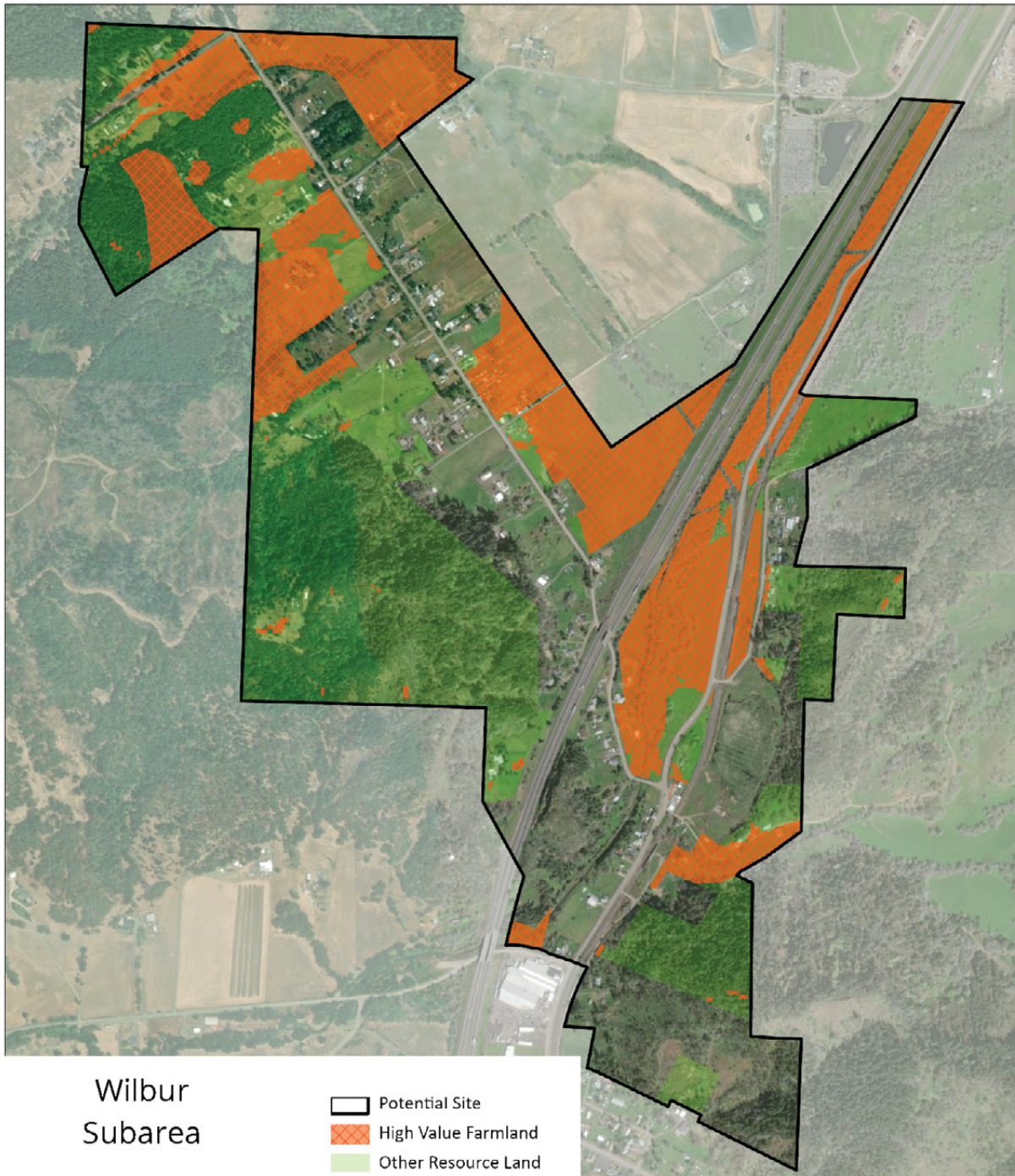
0 495 990 1,980 2,970 3,960 Feet





City of Roseburg
Urban Growth
Boundary Exchange

Subarea #1 (Wilbur) High Value Farmland



Wilbur
Subarea

- Potential Site
- High Value Farmland
- Other Resource Land

* Non-resource land shown
without color overlay

High Value Farmland on
Resource Land

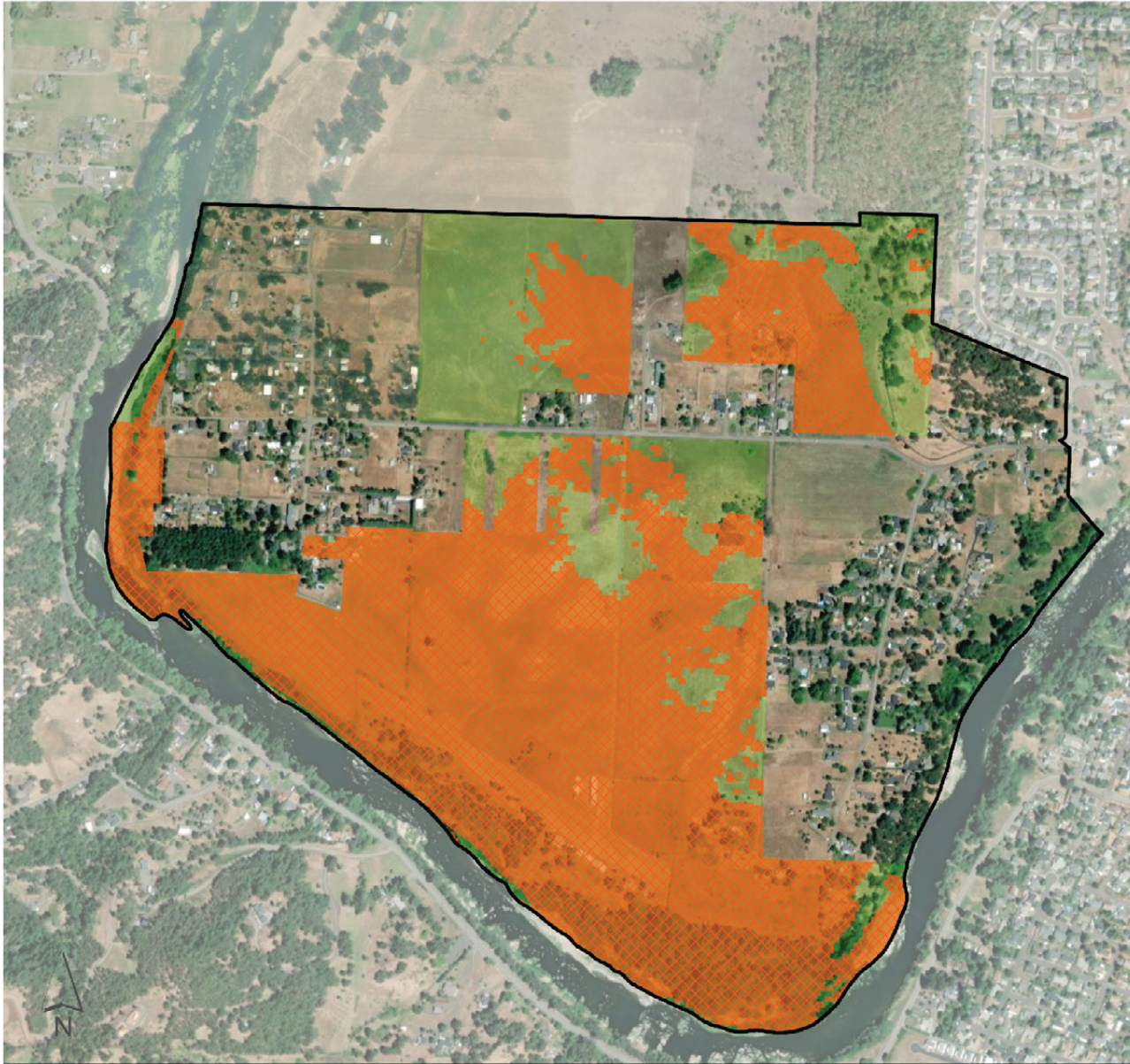
0 500 1,000 2,000 US Feet





City of Roseburg
Urban Growth
Boundary Exchange

Subarea #5 (Charter Oaks) High Value Farmland



Charter Oaks
Subarea
High Value Farmland on Resource Land

- Subarea Boundary
- High Value Farmland
- Other Resource Land

* Non-resource land shown
without color overlay

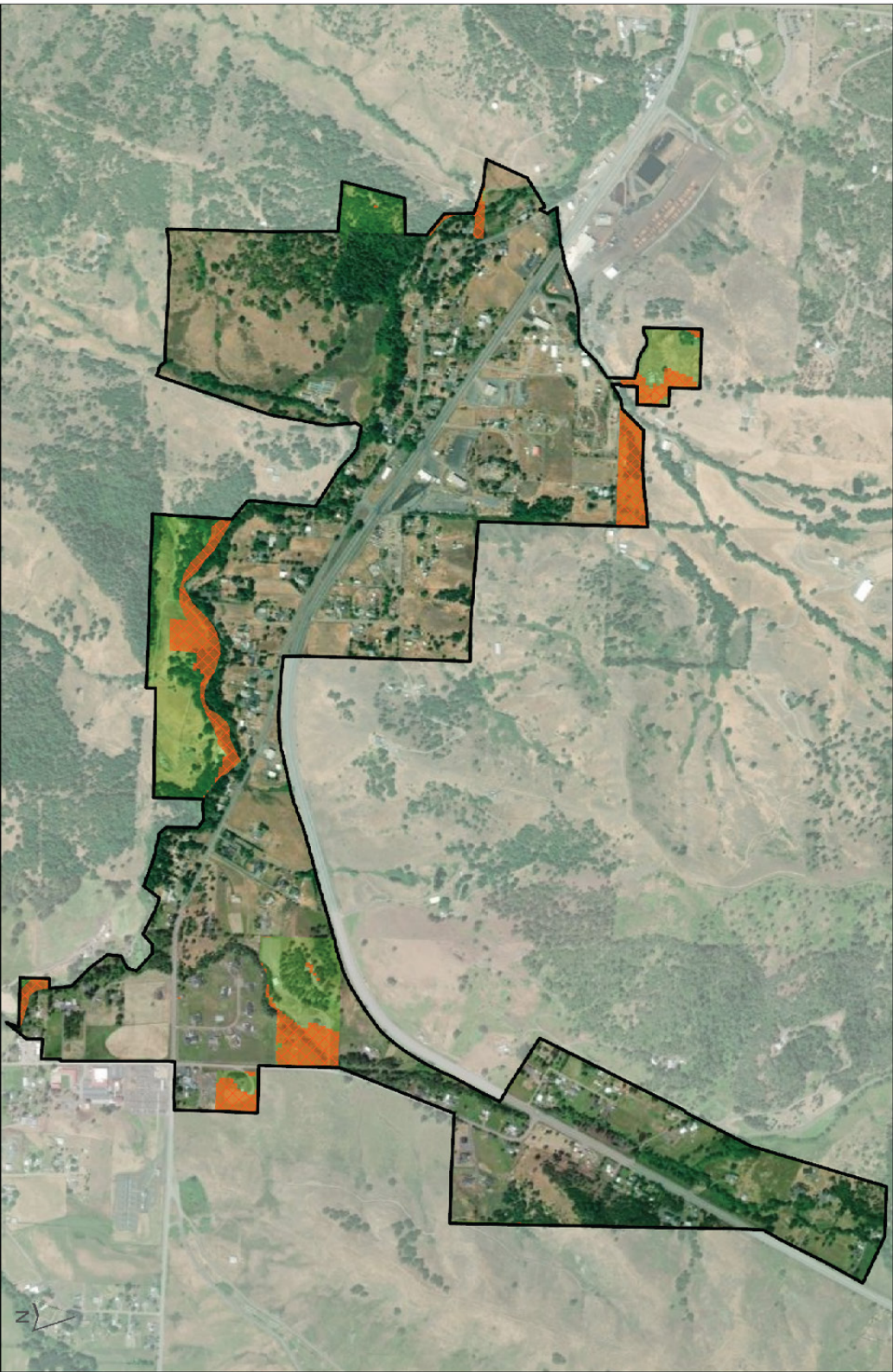
0 500 1,000 2,000 US Feet



City of Roseburg
Urban Growth
Boundary Exchange

Subarea #11 (East Roseburg / Dixonville)
High Value Farmland

Exhibit 29, Subarea #11 (East Roseburg / Dixonville) High Value Farmland



Roseburg East/Dixonville
Subarea

- Subarea Boundary
- High Value Farmland
- Other Resource Land
- * Non-resource land shown without color overlay

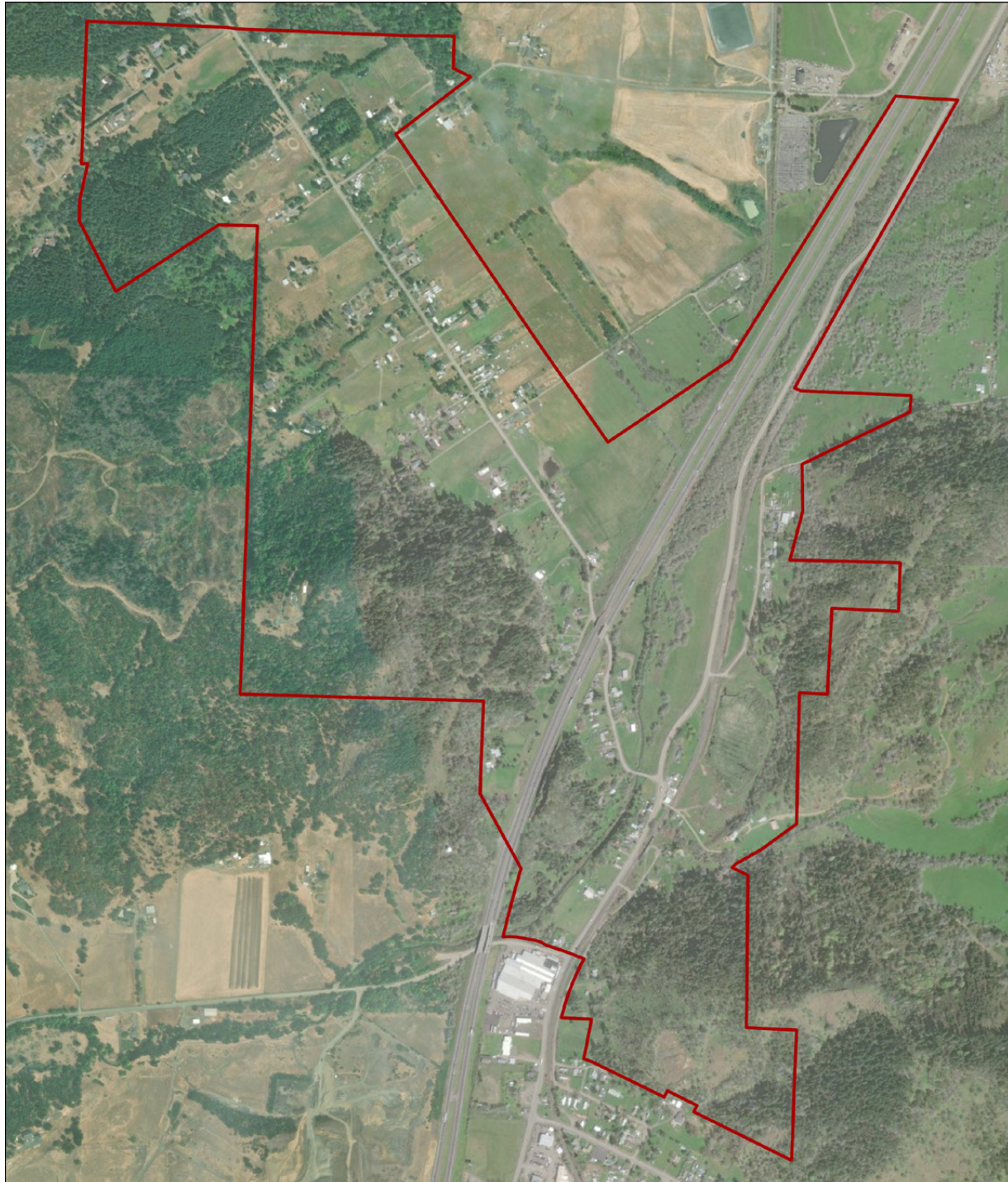
High Value Farmland on Resource Land



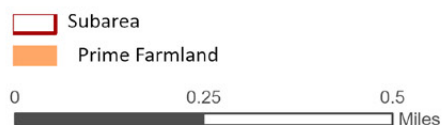
City of Roseburg
Urban Growth
Boundary Exchange

Exhibit 30, Subarea #1 (Wilbur) Prime or Unique Soils

Subarea #1 (Wilbur) Prime or Unique Soils



Wilbur Subarea
Prime Farmland on Resource Land





City of Roseburg
Urban Growth
Boundary Exchange

Subarea #5 (Charter Oaks)
Prime or Unique Soils

Exhibit 31, Subarea #5 (Charter Oaks) Prime or Unique Soils

Insert Exhibit 31, Subarea #5 (Charter Oaks) Prime or Unique Soils

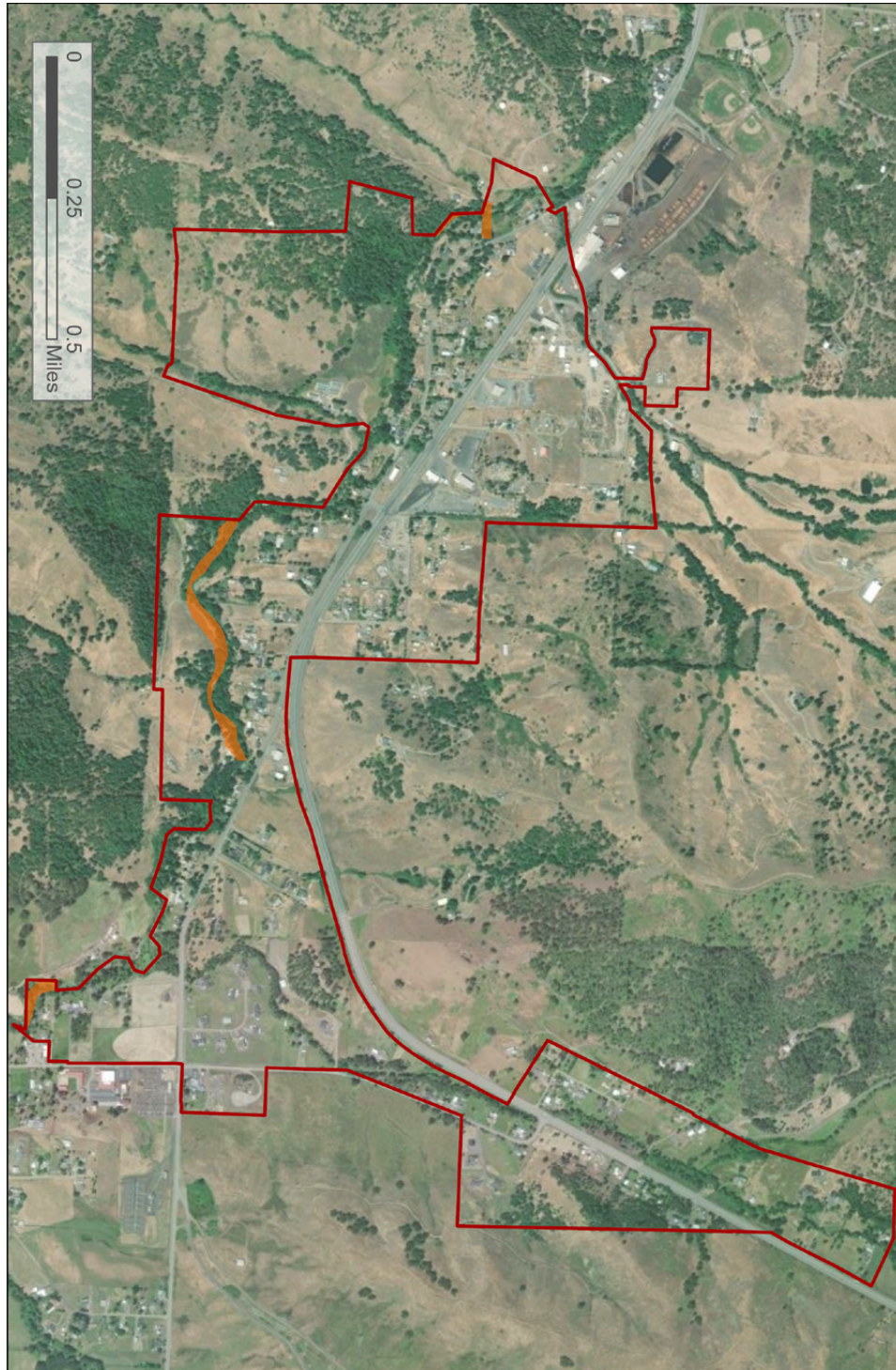




City of Roseburg
Urban Growth
Boundary Exchange

Subarea #11 (East Roseburg / Dixonville)
Prime or Unique Soils

Exhibit 32, Subarea #11 (East Roseburg / Dixonville) Prime or Unique Soils



Roseburg East/Dixonville
Potential Site

Subarea
Prime Farmland

High Value Farmland on Resource Land

* Non-resource land shown
without color overlay

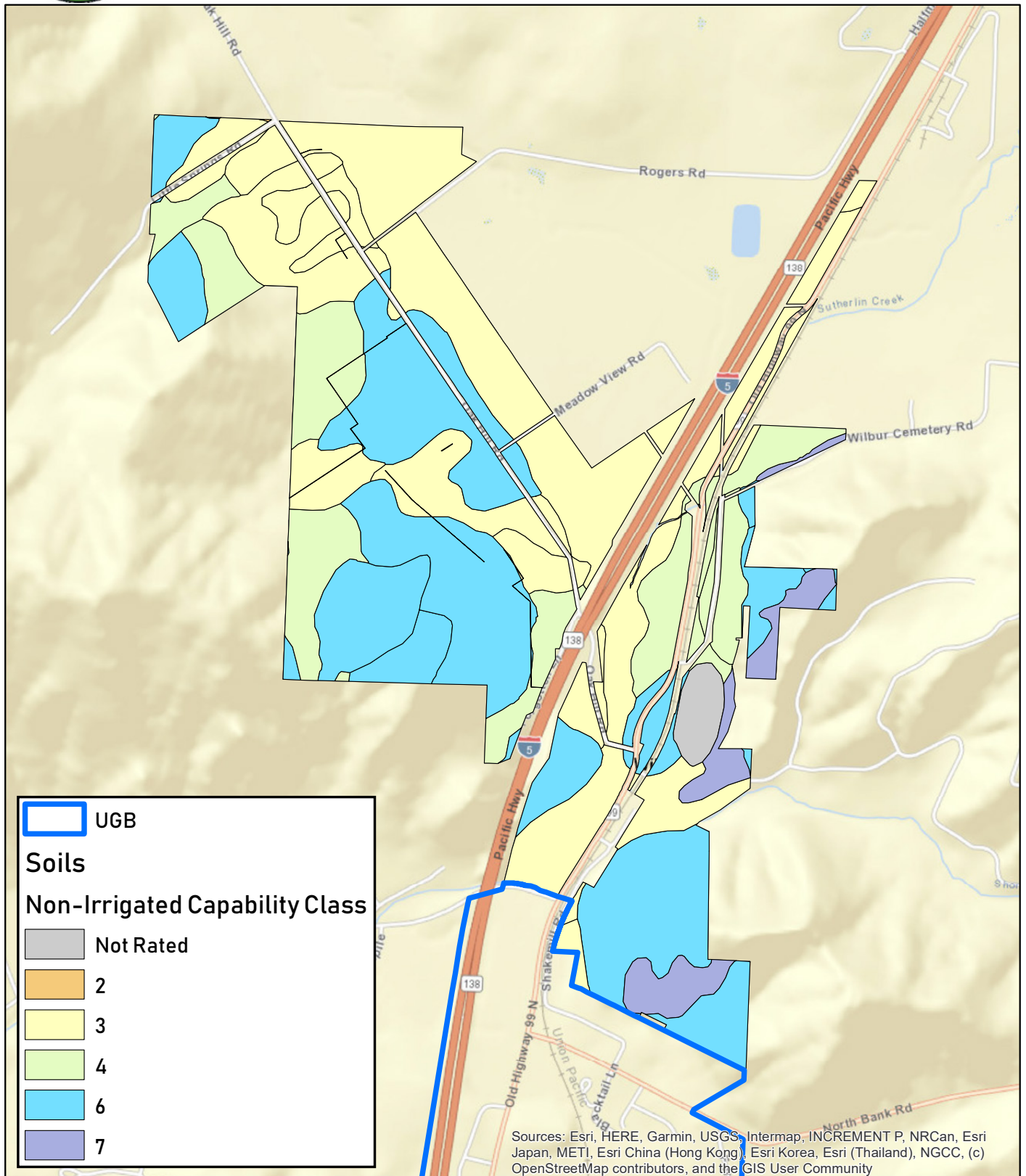




City of Roseburg
Urban Growth
Boundary Exchange

Exhibit 33, Subarea #1 (Wilbur) Soil Class Map
Subarea #1 (Wilbur)
Soil Class

0 430 860 1,720 2,580 3,440 Feet



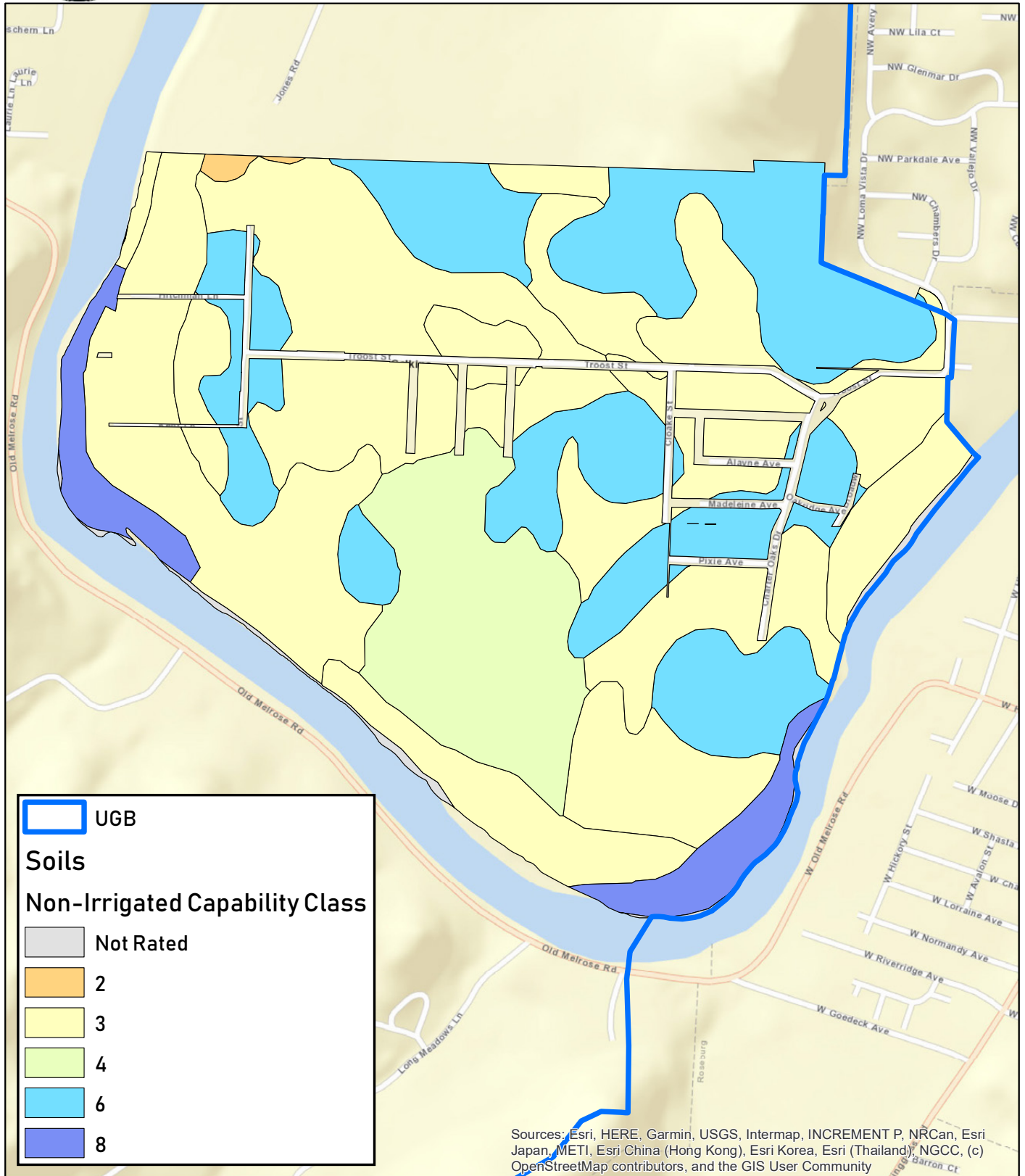


City of Roseburg
Urban Growth
Boundary Exchange

Exhibit 34, Subarea #5 (Charter Oaks) Soil Class Map
Subarea #5 (Charter Oaks)
Soil Class



0 287.5 575 1,150 1,725 2,300 Feet

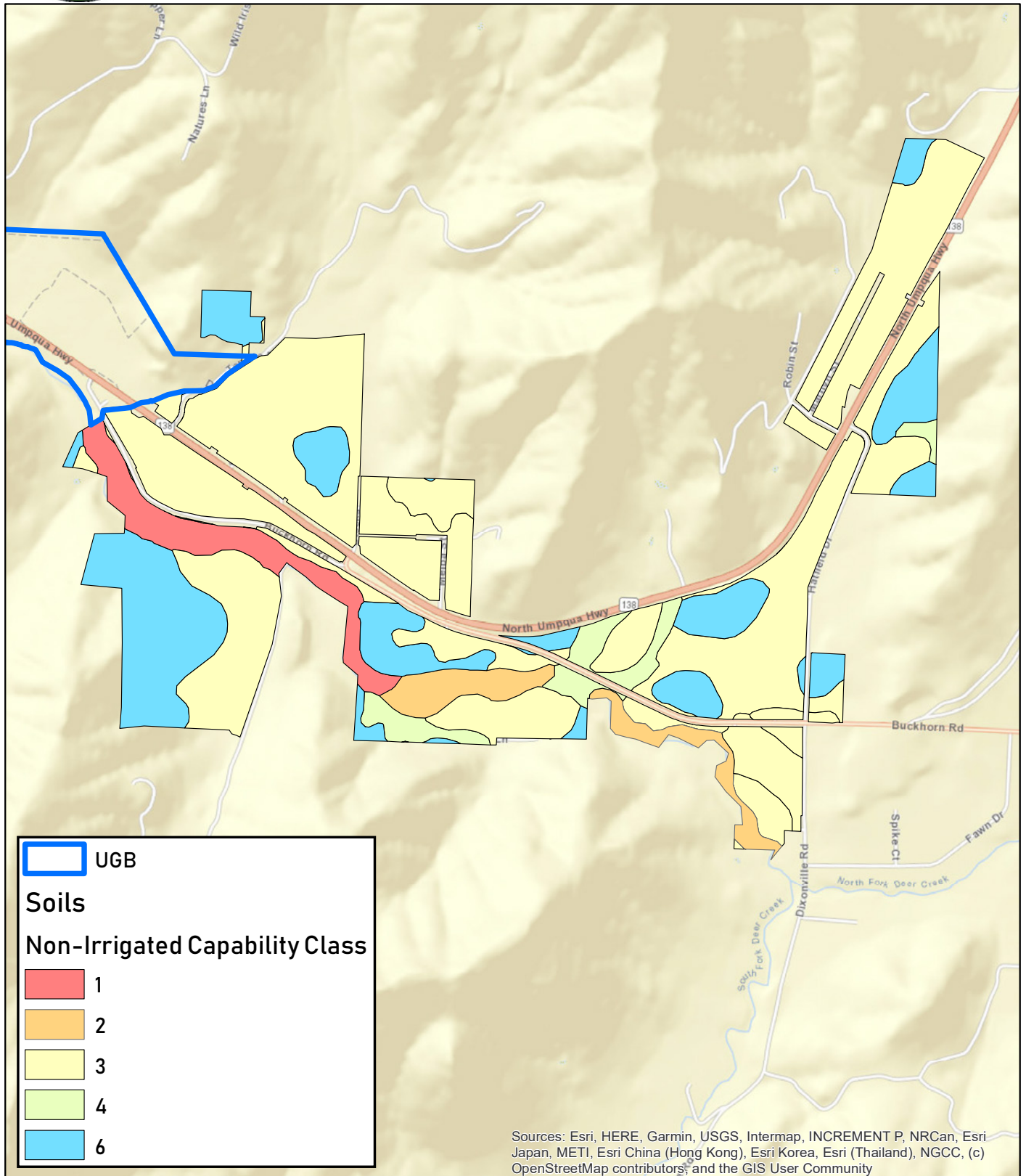




City of Roseburg
Urban Growth
Boundary Exchange

Exhibit 35, Subarea #11 (East Roseburg Dixonville) Soil Class Map
Subarea #11 (East Roseburg / Dixonville)
Soil Class

0 487.5 975 1,950 2,925 3,900 Feet

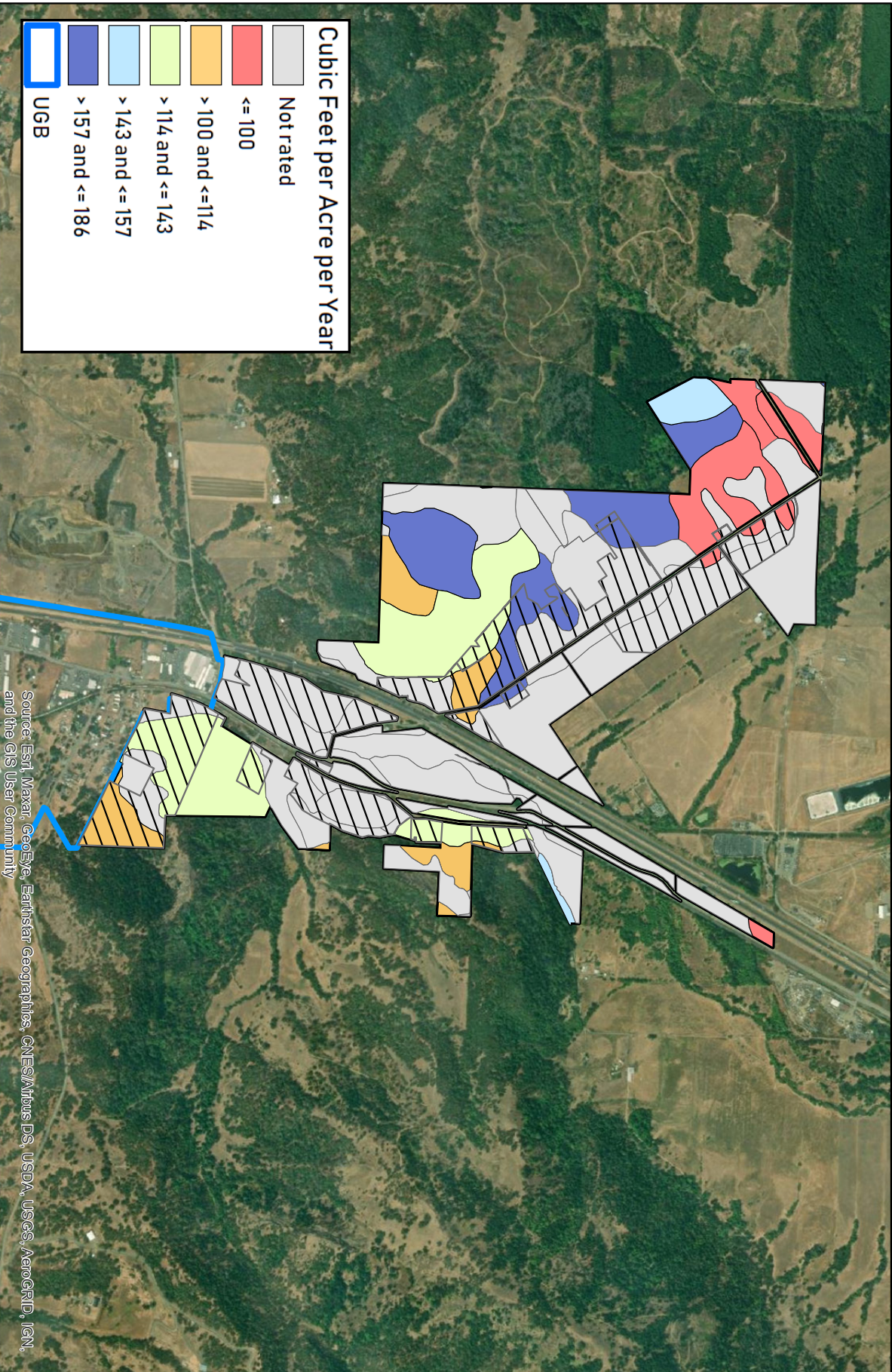




City of Roseburg
Urban Growth
Boundary Exchange

Subarea #1 (Wilbur)
Forest Productivity

Exhibit 36, Subarea #1 (Wilbur) Forest Productivity Map

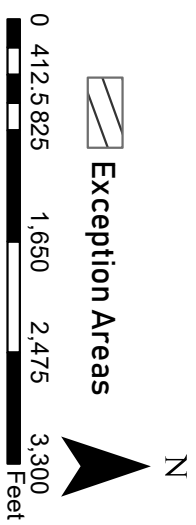





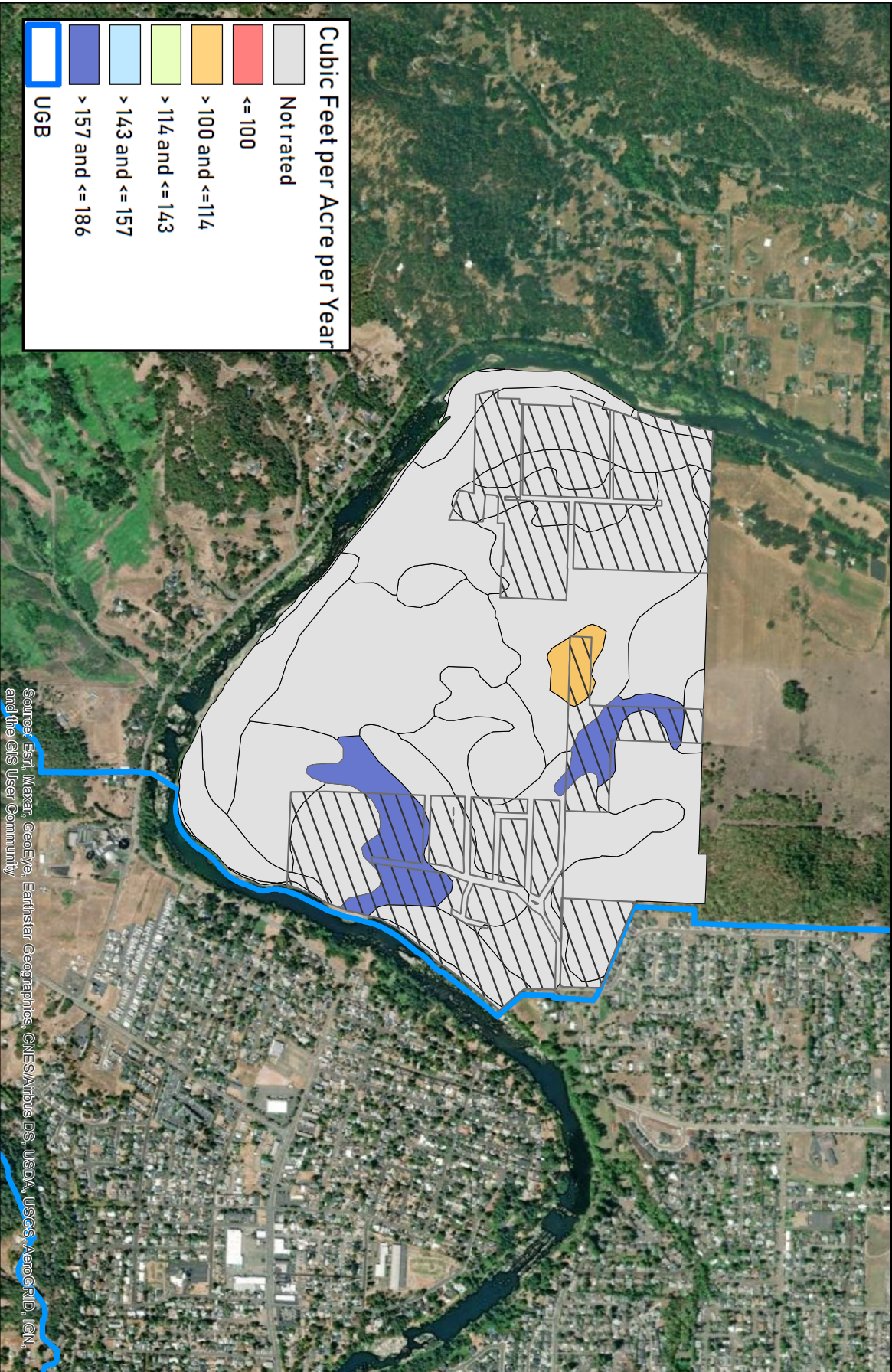
City of Roseburg
Urban Growth
Boundary Exchange

Subarea #5 (Charter Oaks) Forest Productivity

Exhibit 37, Subarea #5 (Charter Oaks) Forest Productivity Map



 Exception Areas



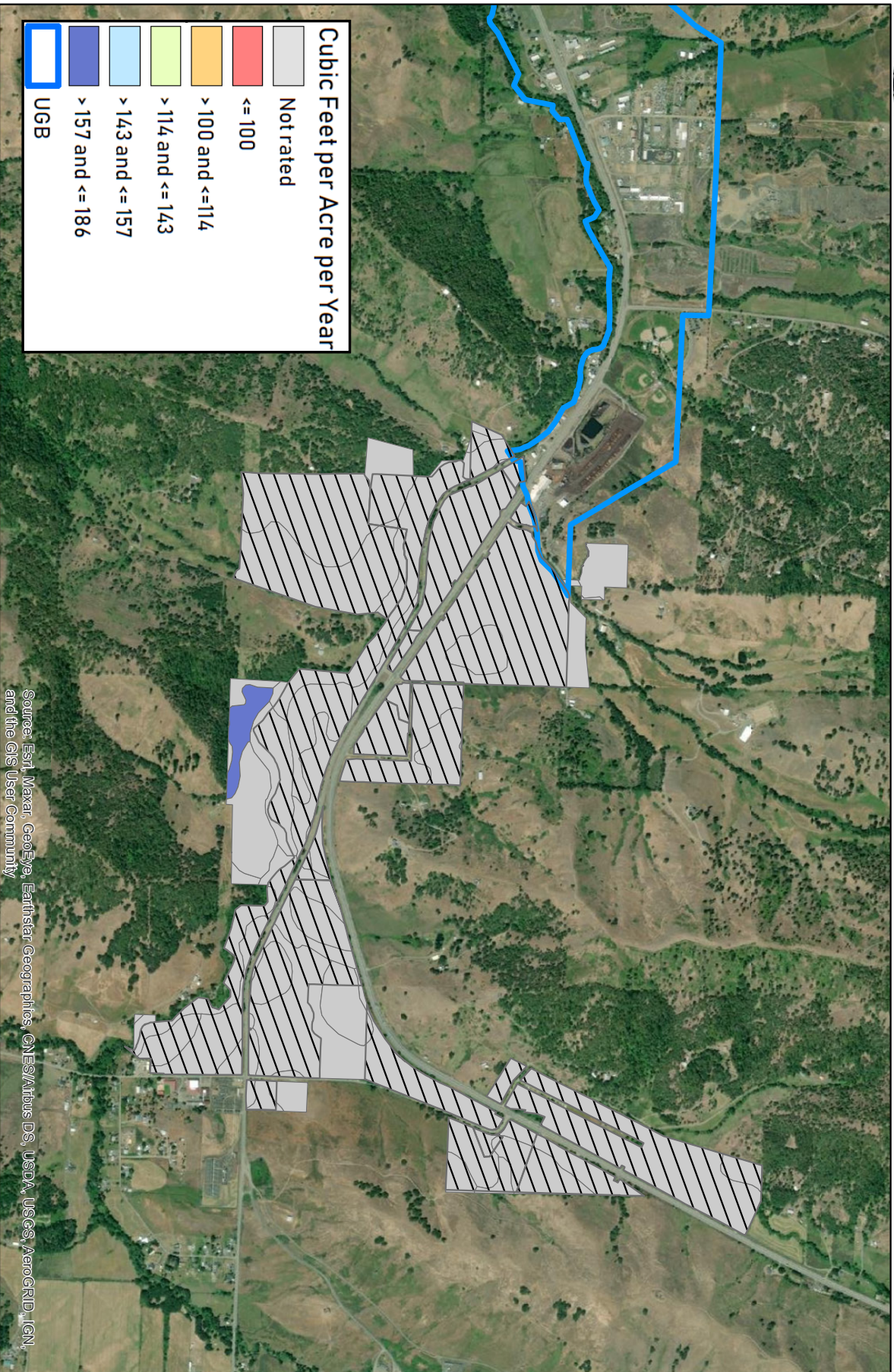
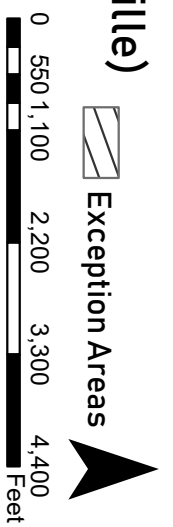
Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



City of Roseburg
Urban Growth
Boundary Exchange

Subarea #11 (East Roseburg/Dixonville) Forest Productivity

Exhibit 38, Subarea #11 (Dixonville) Forest Productivity Map



Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

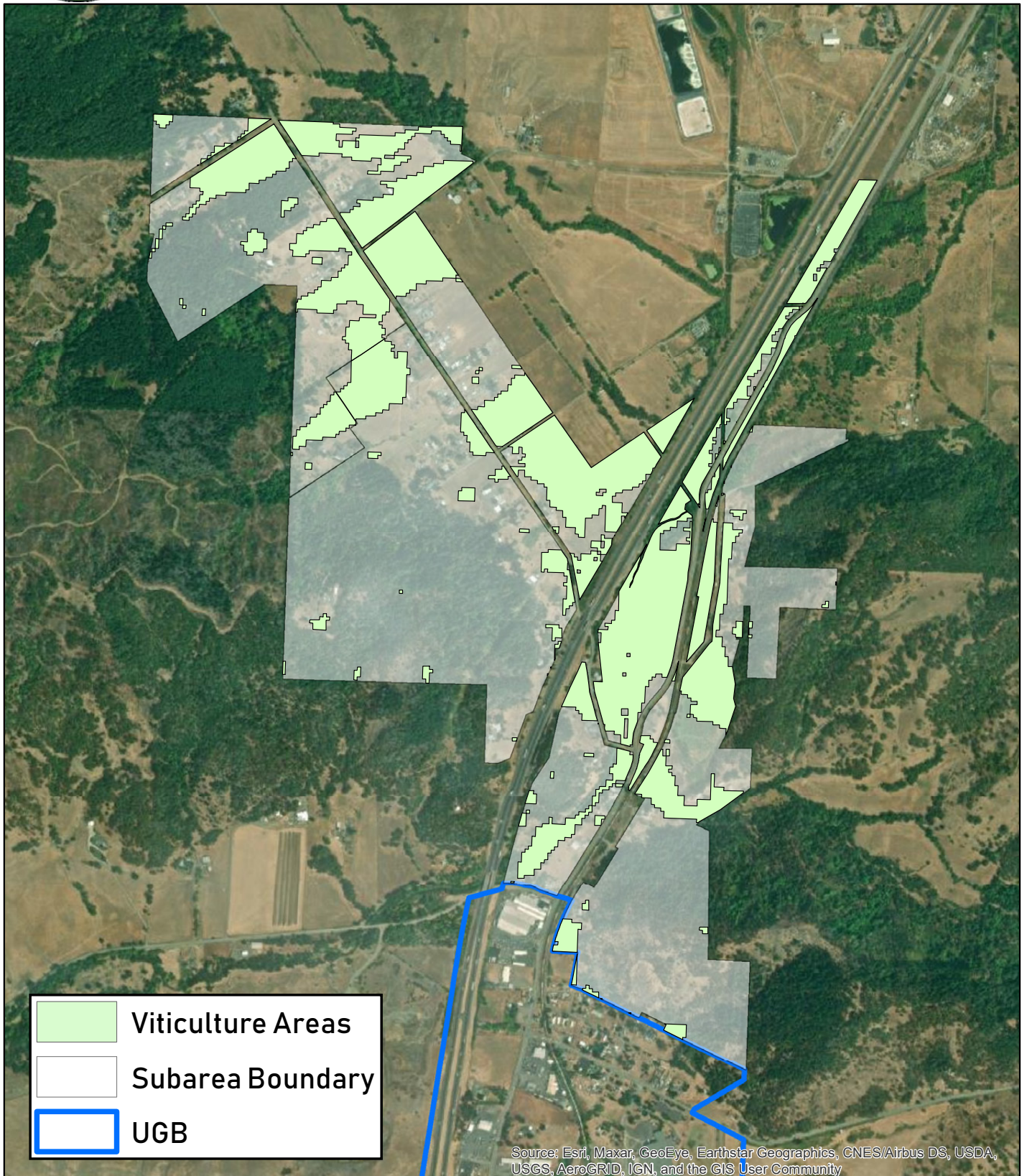


City of Roseburg
Urban Growth
Boundary Exchange

Subarea #1 (Wilbur)
Viticulture Areas



0 430 860 1,720 2,580 3,440 Feet



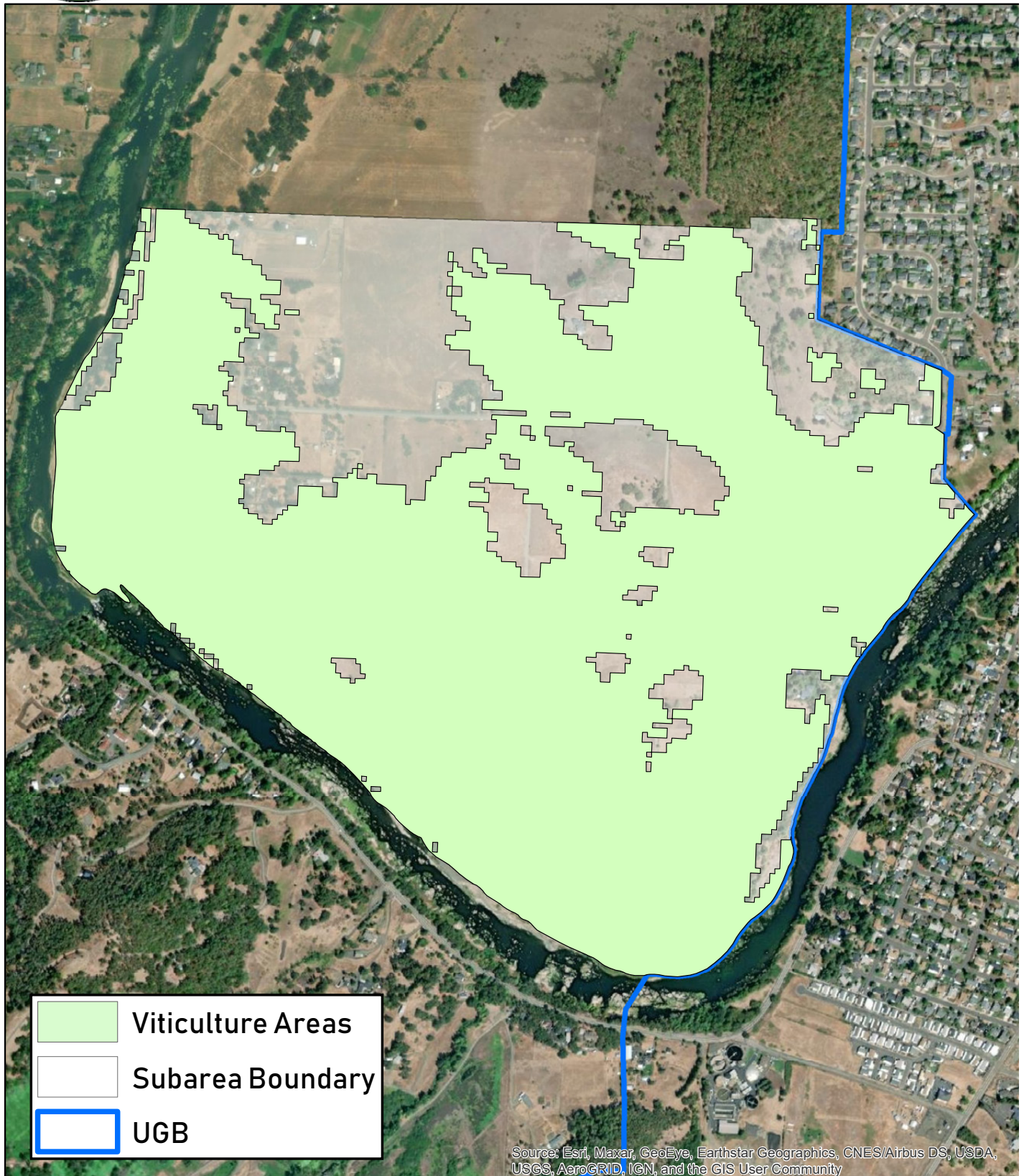


City of Roseburg
Urban Growth
Boundary Exchange

Exhibit 40, Subarea #5 (Charter Oaks) Viticulture Areas Map
Subarea #5 (Charter Oaks)
Viticulture Areas



0 287.5 575 1,150 1,725 2,300 Feet





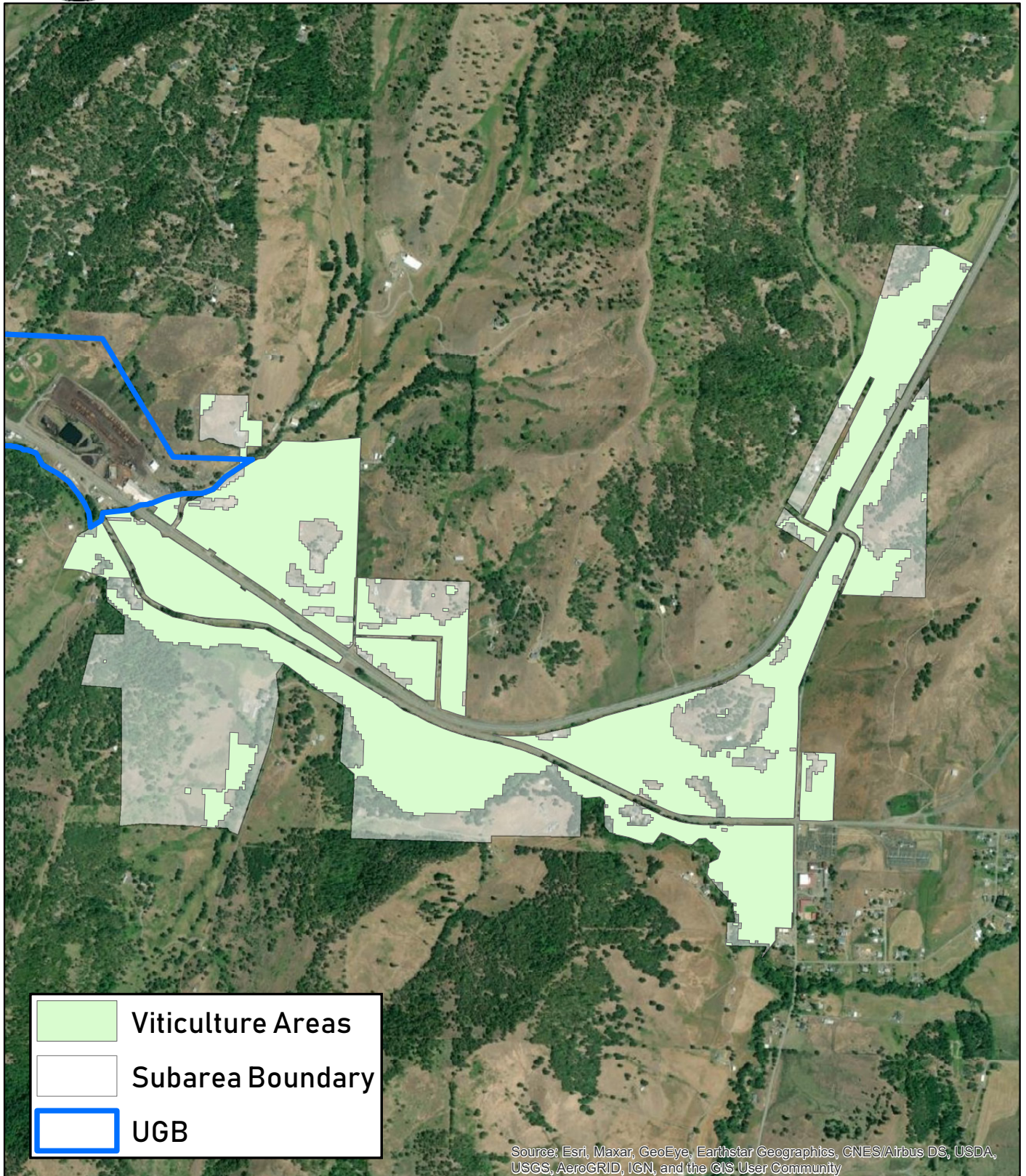
City of Roseburg
Urban Growth
Boundary Exchange

Exhibit 41, Subarea #11 (East Roseburg Dixonville) Viticulture Areas Map

Subarea #11 (East Roseburg / Dixonville)
Viticulture Areas



0 495 990 1,980 2,970 3,960 Feet



2. GOAL 14 EVALUATION: EFFICIENT ACCOMMODATION OF IDENTIFIED LAND NEEDS

In addition to the Prioritization Analysis, Statewide Planning Goal 14 (OAR 660-015-0000(14)) requires that the location of an UGB be determined by evaluating alternative boundary locations in consideration of four locational factors. These factors include:

- 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 (more commonly known as an ESEE (Economic, Social, Environmental, and Energy) 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 analysis applies these locational factors to each Study Subarea.

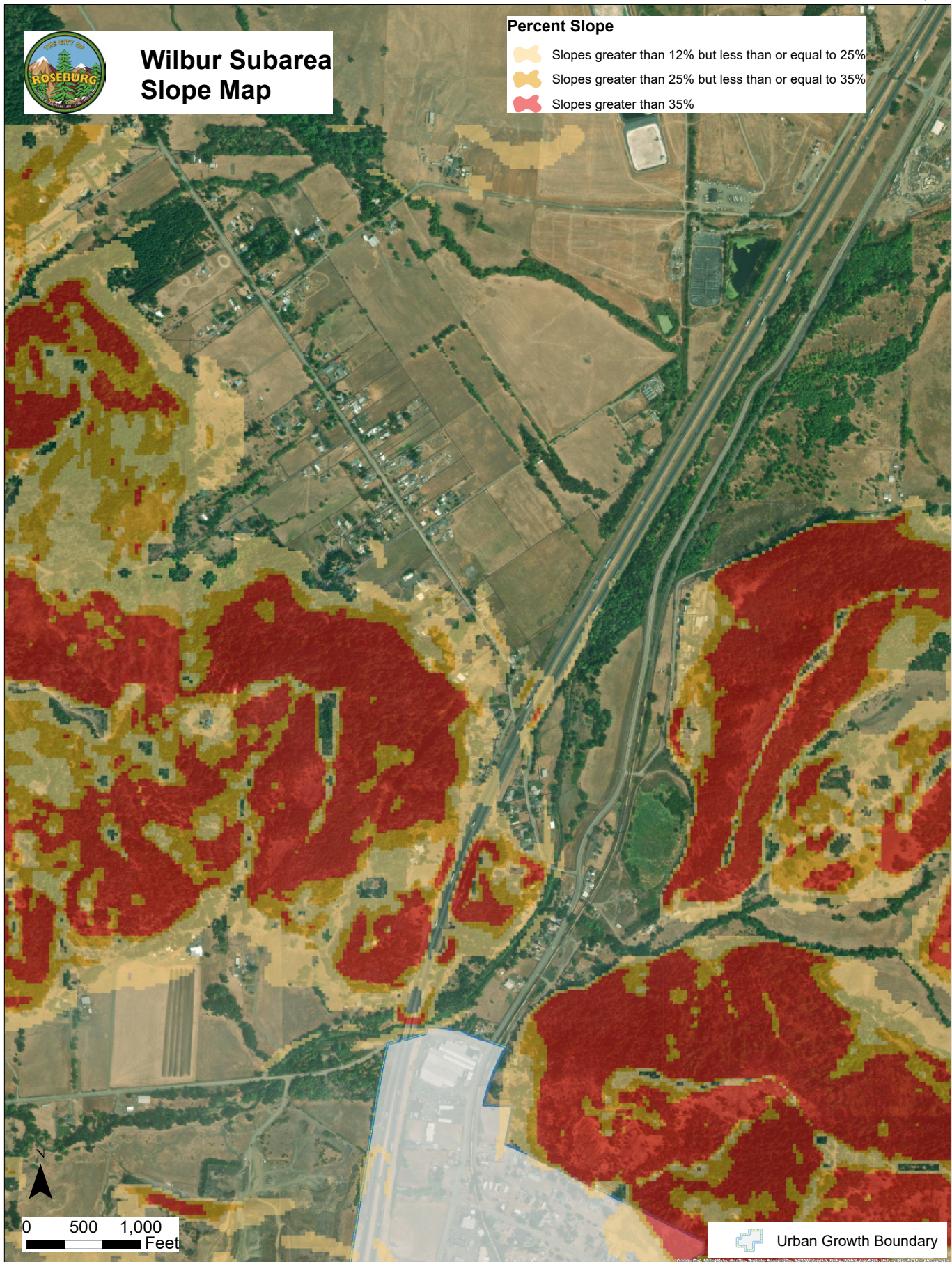
The four location factors listed above have been ranked for compatibility in the following tables with support of various exhibits. The scores for the Goal 14 Location Factors will be combined with the scores from the Prioritization Analysis to determine which of the subareas will be chosen as the Exchange Area.

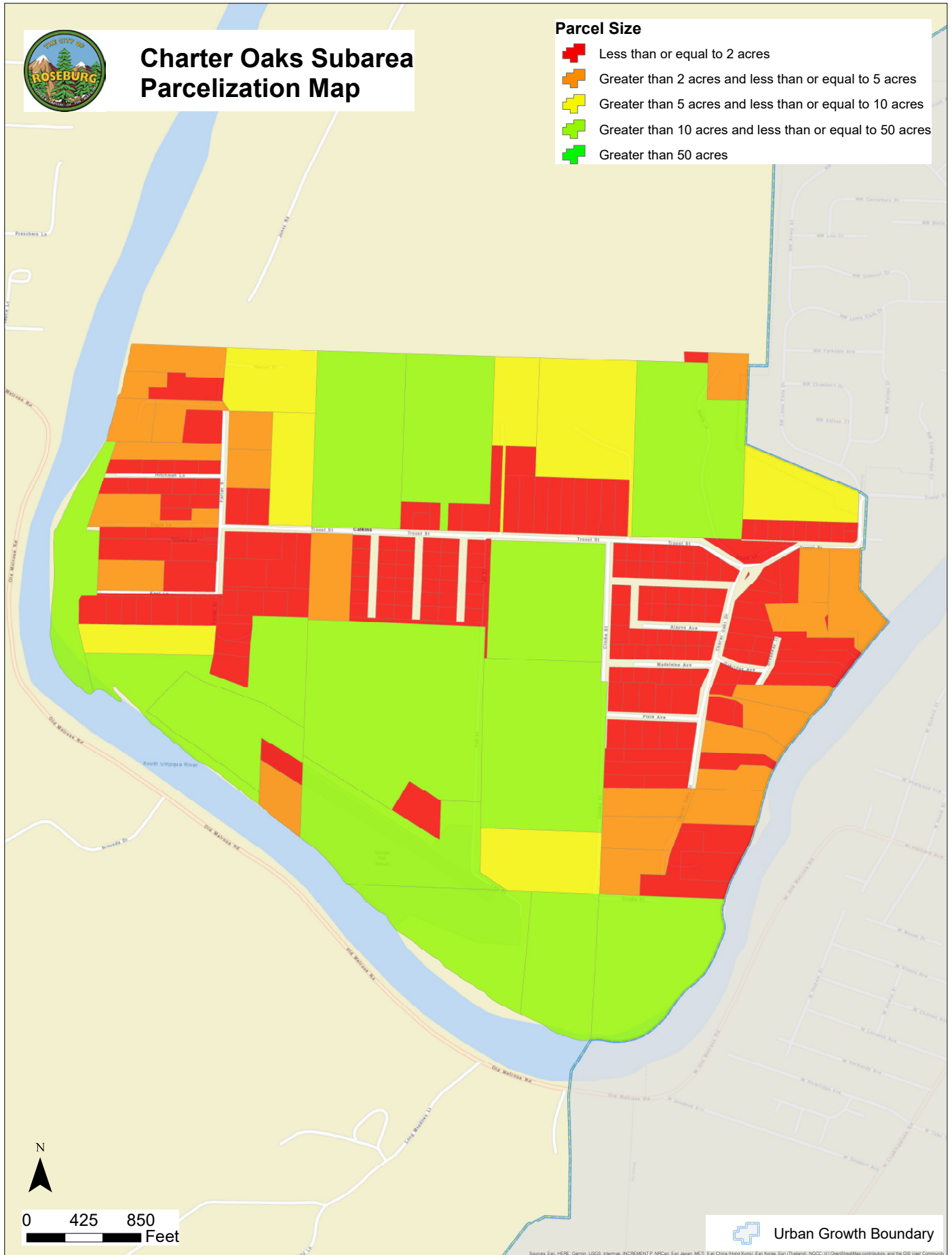
Table 16, Ranking for Goal 14 Location Factor #1

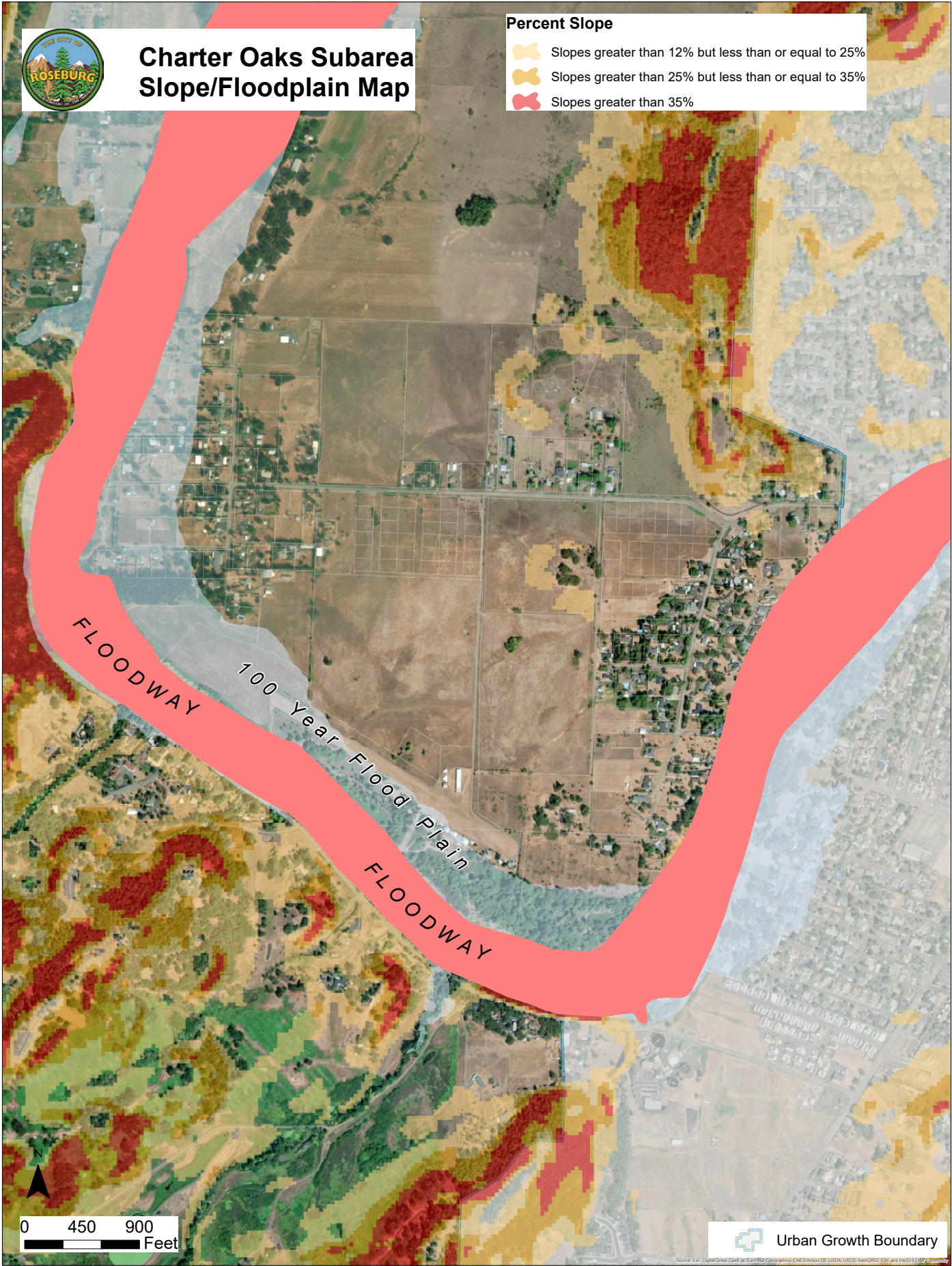
Subarea	Compatibility	Ranking
Wilbur	<p>The Wilbur subarea does not present good opportunities for efficient accommodation of identified land needs.</p> <ul style="list-style-type: none">• This subarea is physically separated from the urban core of Roseburg by the communities of Wilbur and Winchester making any type of integration into Roseburg very difficult.• The southern point of this subarea is over four miles from the closest commercial retail center that provides basic goods like groceries and other retail goods. This results in a subarea where development would be completely dependent upon vehicular traffic. Commercial Service Areas for all subareas are shown in Exhibit 49• A large portion of the eastern extent of this subarea is divided by I-5 via a highway underpass.• The land on the west side of I-5 is significantly developmentally constrained because of its proximity to both I-5, Hwy 99 and Sutherlin Creek.• Approximately 22 acres of the subarea are zoned for uses that would not be able to be redeveloped into residential.• 42% of the parcels within this subarea are 2 acres or less in size, as shown in Exhibit 42.• Nearly half (279 acres) of the lands within the subarea are constrained with slopes of 25% or greater as shown in Exhibit 43.	3

Subarea	Compatibility	Ranking
Charter Oaks	<p>The Charter Oaks subarea presents good opportunities for efficient accommodation of identified land needs.</p> <ul style="list-style-type: none"> ● Immediately adjacent to urbanized residential lands within the neighborhood of Hucrest making integration into the city relatively efficient with close proximity to pedestrian infrastructure. ● Subarea is within two miles of from the closest commercial retail center that provides basic goods like groceries and other retail goods. This results in a subarea where development would have opportunities for multi-modal transportation to and from goods and services. ● There are no major topographical features dividing this subarea from the City. ● Some of the smaller residential parcels along the South Umpqua River and Charter Oaks drive would have difficulty urbanizing because of the parcel sizes and some of the floodway restrictions. ● No major slope constraints within the subarea. ● Over three quarters (222 of 252/88%) of the parcels within this subarea are 2 acres or less in size as shown in Exhibit 44. However, approximately 80 of those lots consist of undeveloped platted subdivisions, which consist of smaller lots that never developed because of septic, water and access constraints. ● 123 Acres/41 parcels impacted by the SFHA as shown in Exhibit 45. 	1
Roseburg East /	<p>The Roseburg East subarea presents moderate opportunities for efficient accommodation of identified land needs.</p> <ul style="list-style-type: none"> ● This subarea is a linear (east/west) extension of land as a result of the topography and physical layout of the Dixonville area. As shown with Exhibit 46, the area consists of a narrow valley floor that follows Deer Creek, Hwy 138 and Buckhorn Road situated between steep foothills to the north and south. As a result, the subarea is linear from east to west with almost every parcel having frontage along Buckhorn Road or Hwy 138. For comparison, the overall distance from east to west of this subarea is 2.5 miles, as measured along Hwy 138. Whereas, the other two subareas are on average 1.25 miles from one extent to the other. ● Over half (164 of 233/70%) of the parcels within this subarea are 2 acres or less in size as shown in Exhibit 46. ● 31 acres/24 parcels impacted by the SFHA as shown in Exhibit 47. ● Approximately a third (172 acres) of the lands within the subarea are constrained with slopes of 25% or greater as shown in Exhibit 47. ● A large portion of the land along the north side of Hwy 138 is zoned and committed to commercial/industrial uses as shown in Exhibit 26. 	2

Exhibit 48 demonstrates areas of significant parcelization for the entire study area.









Roseburg East/Dixonville Subarea Parcelization Map

- Parcel Size**
- Less than or equal to 2 acres
 - Greater than 2 acres and less than or equal to 5 acres
 - Greater than 5 acres and less than or equal to 10 acres
 - Greater than 10 acres and less than or equal to 50 acres
 - Greater than 50 acres

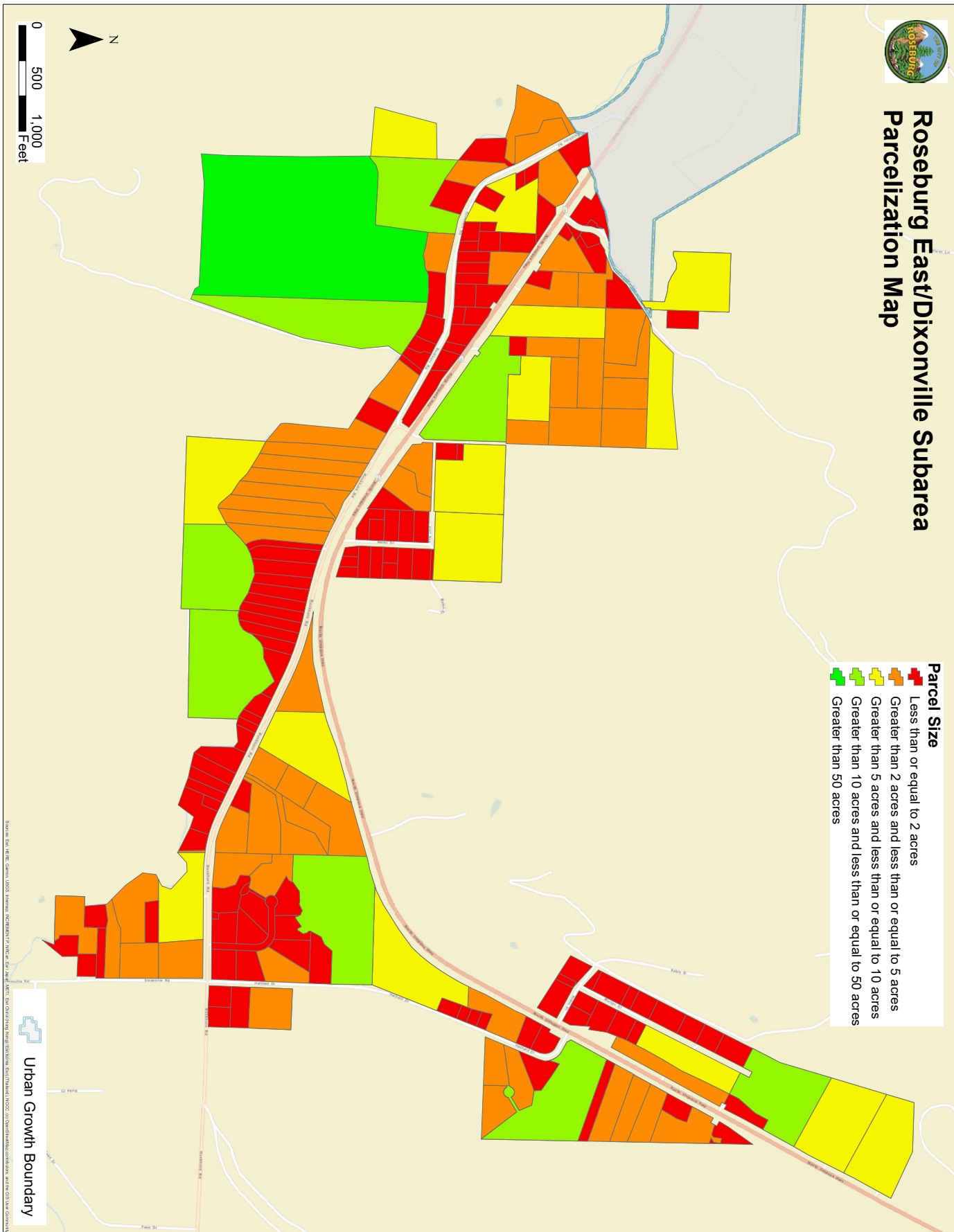
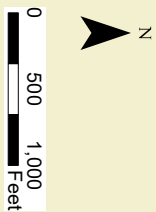


Exhibit 46, Subarea 11 East Roseburg Subarea parcelization



Roseburg East/Dixonville Subarea Slope/Floodplain Map

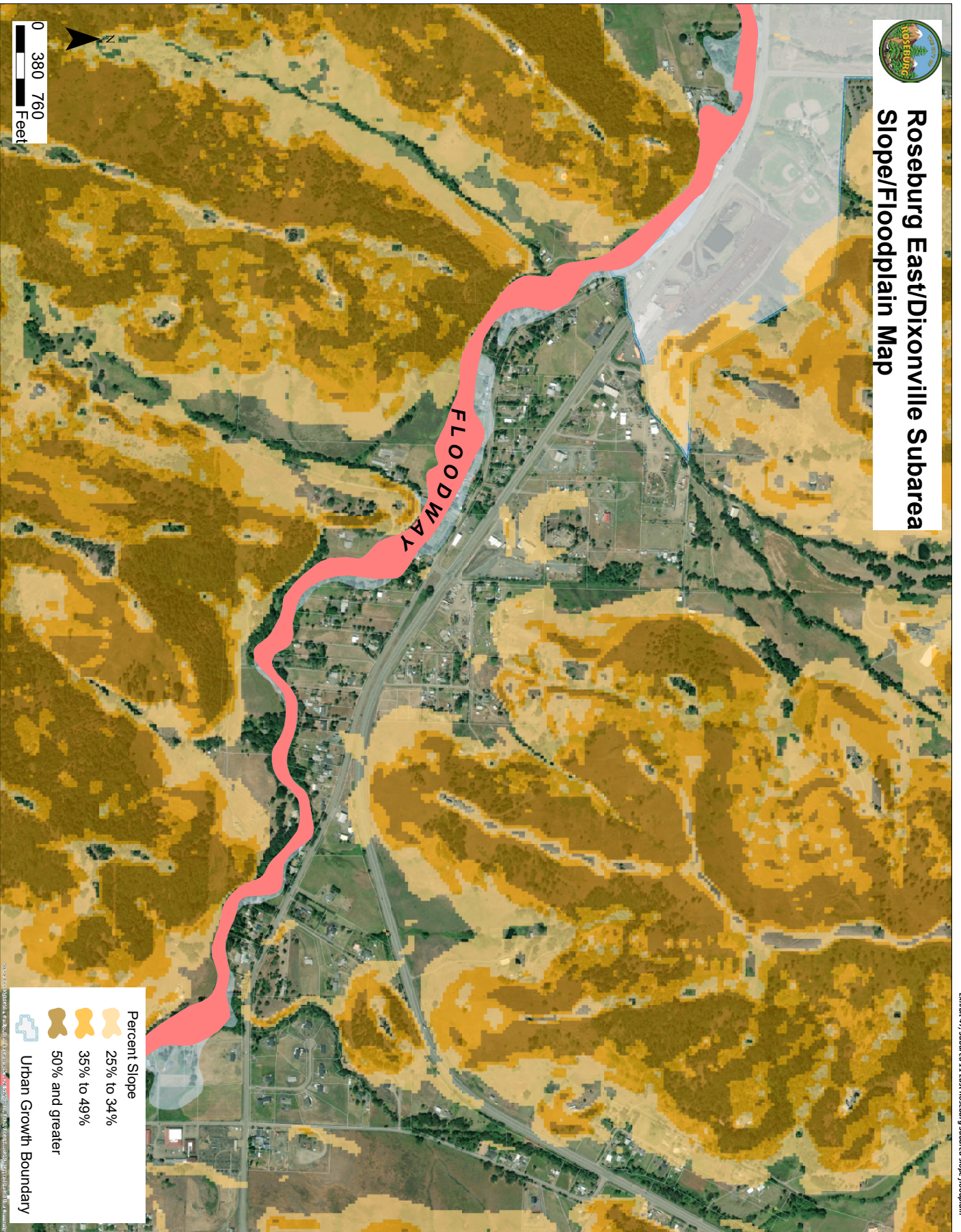
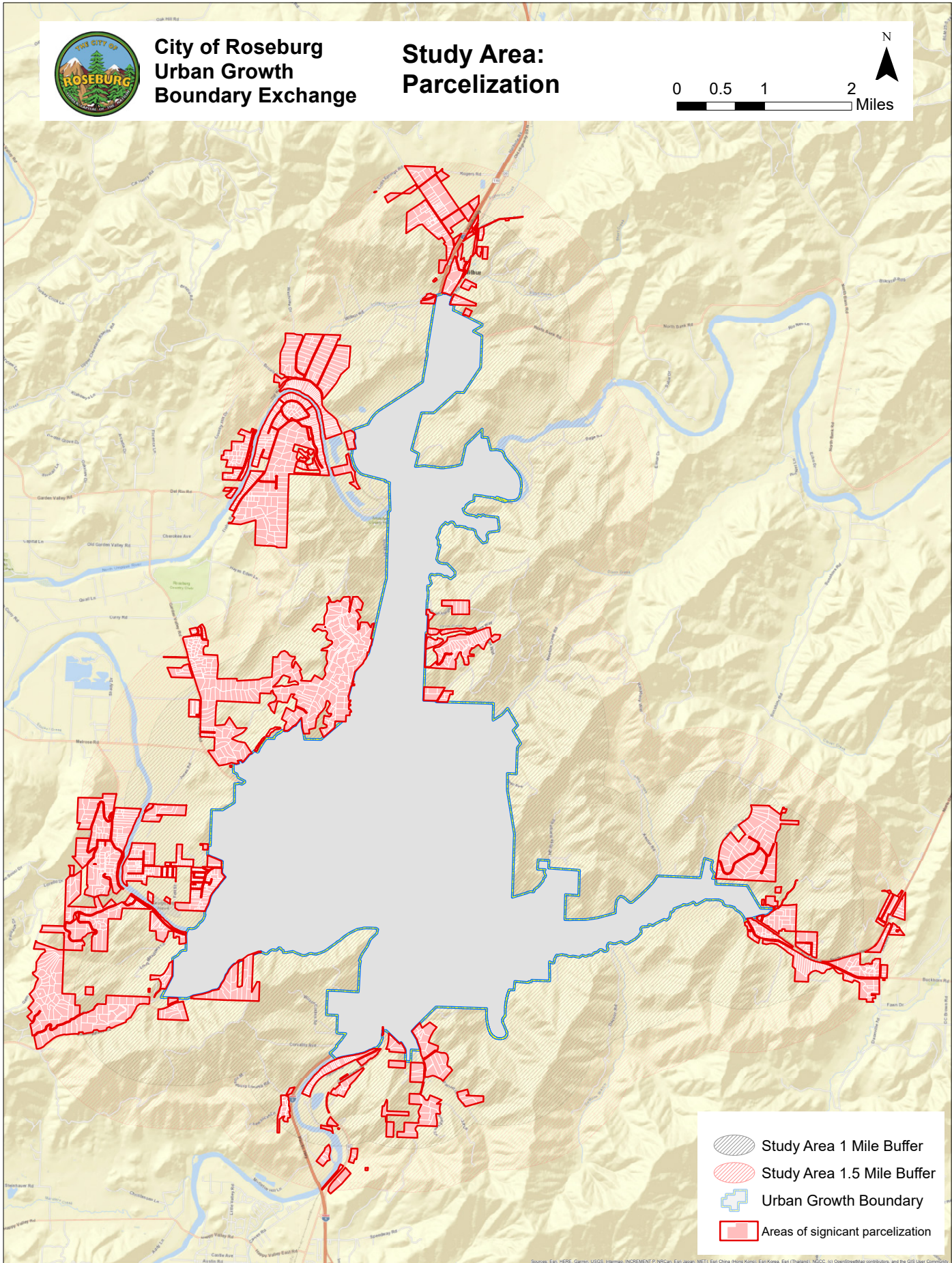
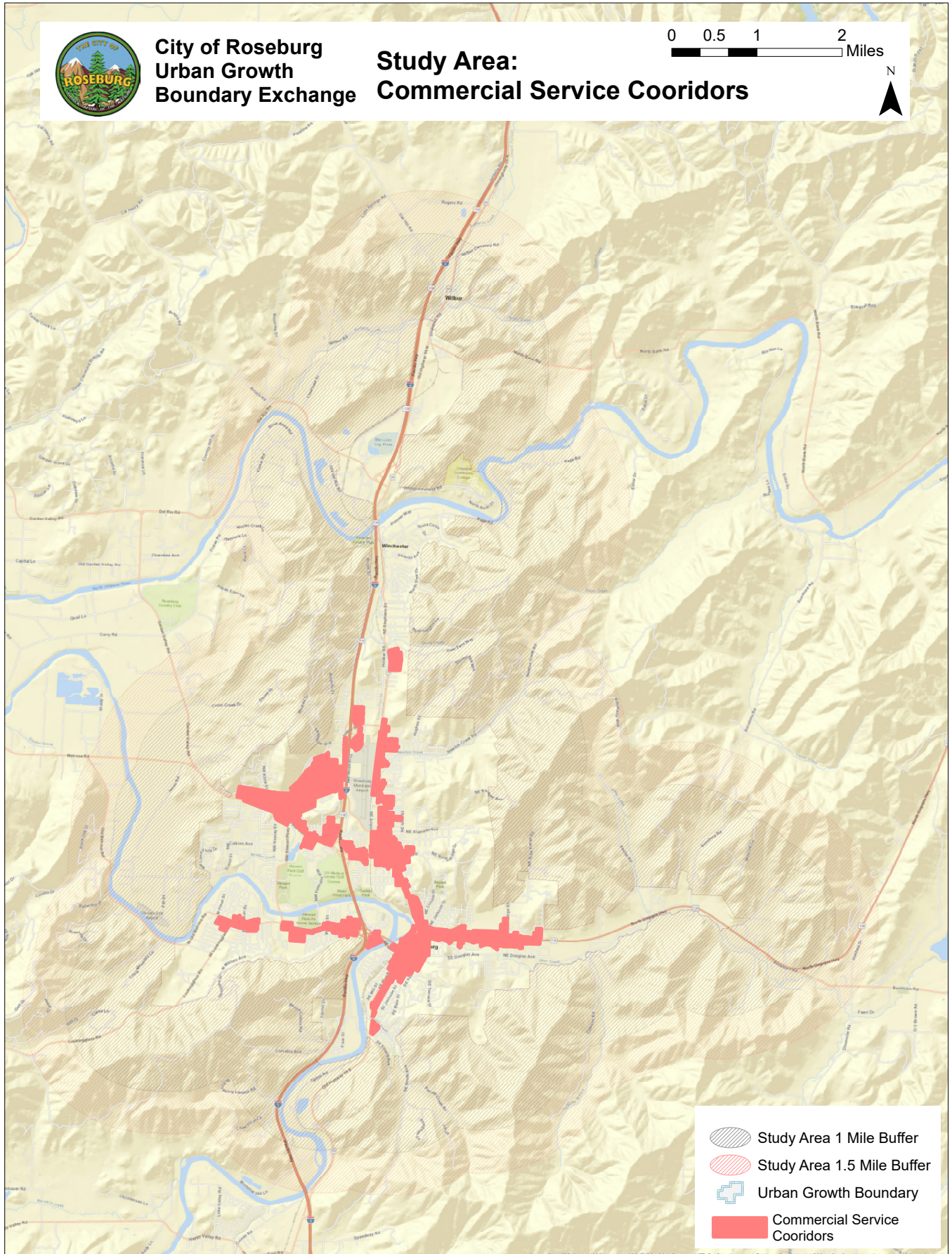


Exhibit 47, Subarea 11 East Roseburg Subarea slope/floodplain





3. GOAL 14 EVALUATION: ORDERLY AND ECONOMIC PROVISION OF PUBLIC FACILITIES AND SERVICES

Table 17, Ranking for Goal 14 Location Factor #2

Subarea	Compatibility	Ranking
Wilbur	<p>The Wilbur subarea does not present good opportunities for orderly and economic provision of public facilities and services.</p> <ul style="list-style-type: none"> • <u>Sewer</u> – Services are at the southern end of this subarea. Future extension of sewer services into this subarea do not appear to pose any major issues. Similar to both other subareas, extending sewer would require financing the appropriate sewer infrastructure including collection lines and, where necessary, lift stations. • <u>Water</u> – Extending city water into this subarea is impractical. All land north of the North Umpqua River is served by the Umpqua Basin Water Association, which operates independent of the City. Water and sewer infrastructure for all three subareas is shown in Exhibit 52. • <u>Parks</u> – The City has an identified deficiency of park facilities within the north and northeast portion of the city. Extending the UGB further north would exacerbate this issue. Additionally, with the community of Winchester being under the County’s planning jurisdiction the City has limited ability to plan for future park facilities that could potentially serve a need for the Wilbur area. School, park, and transit services for all subareas are shown in Exhibit 50. • <u>Police/Fire</u> – Of the three final subareas, providing police and fire service will be the least efficient. The southern end of the subarea is nearly 8 miles via Hwy 99 from the City’s police station and a similar distance from the closest fire station. This is over twice the distance compared to the other two subareas. Emergency response times for all subareas is shown in Exhibit 51. • <u>School</u> – The Wilbur subarea is relatively close to Winchester Elementary, which is the most northern elementary school in the Roseburg School district. However, this subarea is miles to the closest middle school and 9 miles from Roseburg High School. • <u>Streets</u> – As a result of the linear layout of the subarea along Oak Hill Road and Hwy99, it contains approximately 2.5 linear miles of existing street infrastructure. Additionally, the existing street infrastructure is split between ODOT and County maintenance creating inefficiencies for future maintenance and development purposes. 	3

<p>Charter Oaks</p>	<p>The Charter Oaks subarea presents good opportunities for orderly and economic provision of public facilities and services.</p> <ul style="list-style-type: none"> ● <u>Sewer</u> – Roseburg Urban Sanitary does not currently have any facilities within this subarea. However, facilities are directly to the east at the intersection of Troost Street and Loma Vista Drive. Additionally, Roseburg Urban Sanitary Authority has completed an engineering feasibility study to upgrade the Loma Vista Pump Station. This study concluded that constructing the new pump station closer to the South Umpqua River along Troost Street would allow for the acquisition of a parcel of land of a size that meets the current pump station construction requirements. This new location will provide for a potential new gravity sewer system to serve a large portion of this subarea. Funding for this project would be budgeted in a future fiscal year. ● <u>Water</u> – Existing water infrastructure extends within the Troost and Charter Oaks right-of-way, which serves many of the existing homes within this subarea. The sole water main serving the area is an 8” pipe, which limits the amount of volume that can be served to the area. This pipe size will need to be upgraded in order to improve water volume in the area. Additionally, a water reservoir, as planned within the Roseburg Water Master Plan, would need to be funded in order to provide adequate water service for fire suppression if the City were to expand into this subarea. Water and sewer infrastructure for all three subareas is shown in Exhibit 52. ● <u>Parks</u> – The Charter Oaks Subarea is approximately 2 miles from Stewart Park, which is a regional park that provides a full range of recreational opportunities to residents and visitors of the city. School, park, and transit services for all subareas are shown in Exhibit 50. ● <u>Police/Fire</u> – The Charter Oaks subarea is approximately 2.5 miles from the nearest fire station and approximately 4.5 miles from the Roseburg Police Department. If incorporated into the city, Charter Oaks would become one of the furthest points from the city’s police station. However, relative to the other two subareas, which are approximately 5/8 miles from the Police & Fire Services, Charter Oaks is the most efficient for police and fire protection. Emergency response times for all subareas is shown in Exhibit 51. ● <u>School</u> – The Charter Oaks subarea is likely the most efficient subarea for serving by the Roseburg School District. The center of the subarea is approximately 2 miles from the nearest elementary School, 3 miles from the nearest middle school and 4 miles from Roseburg High School. Additionally, this subarea contains a 17.5 acre piece of property owned by the School District that if incorporated into the city would be zoned for Public/Semi Public Uses and be a potential future location for school related facilities. ● <u>Streets</u> – Relative to the two other subareas, the Charter Oaks subarea has a more compact footprint for a proposed expansion of street infrastructure. As a result, it currently contains approximately 1.6 linear miles of street infrastructure serving the area. An additional advantage of the Charter Oaks area for street services is the topographical layout, which unlike the Wilbur and Roseburg East, doesn’t result in a predominantly linear expansion. This creates opportunity for more logical street infrastructure and reduces the amount of dead end streets necessary to provide public street infrastructure to future development. 	<p>1</p>
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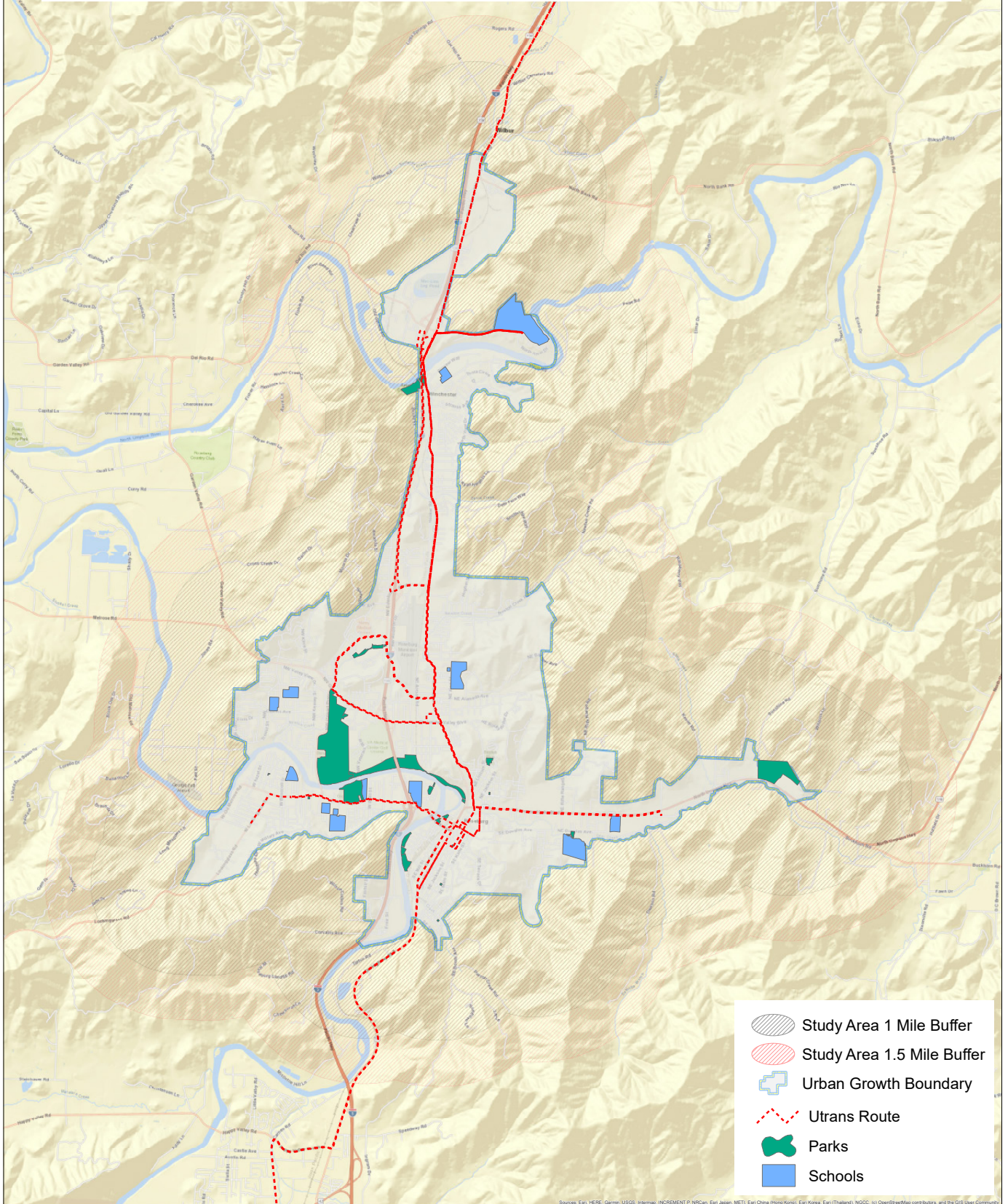
<p>Roseburg East/ Dixonville</p>	<p>The Roseburg East subarea presents moderate opportunities for orderly and economic provision of public facilities and services.</p> <ul style="list-style-type: none"> ● <u>Sewer</u> – Services are at the western end of this subarea. Future extension of sewer services into this subarea do not appear to pose any major issues. Similar to both other subareas, extending sewer would require financing the appropriate sewer infrastructure including collection lines and, where necessary, lift stations. ● <u>Water</u> – Water infrastructure currently exists within this subarea. Similar to the Charter Oaks Subarea, many existing homes in this subarea are currently served by the city’s water system. However, the volume of water serving this area is limited by an 8” water main along Hwy 138, which would need to be upsized in order to provide adequate volumes to the area. Some existing properties in the Dixonville area are above the service pressure zones and require private booster pumps to serve, which is not preferred from a water service provider’s standpoint, because private pumps periodically fail and create private side issues for water service. The Dixonville area does contain 3 reservoirs, which provides adequate fire suppression capacity for those properties within the pressure zones of the system. Water and sewer infrastructure for all three subareas is shown in Exhibit 52. ● <u>Parks</u> – The eastern side of Roseburg, specifically along the Diamond Lake Blvd corridor are most immediately served by Sunshine Park, which is classified as a community park. Sunshine Park does have a full variety of recreational opportunities from walking paths, to more active recreational opportunities, such as ball fields, pavilions and a playground structure. Sunshine Park is approximately 2 miles away from the center point of this subarea. School, park, and transit services for all subareas are shown in Exhibit 50. ● <u>Police/Fire</u> – Police and Fire services to this subarea would be provided most closely by the Public Safety Center, which is approximately 5 miles from the center point of this subarea. This makes the Roseburg East/Dixonville subarea more serviceable for police and fire protection than the Wilbur subarea, but not as efficient as the Charter Oaks subarea. Additionally, Dixonville has its own rural fire district. If the City were to choose to expand into the Dixonville area it would result in overlapping of services between the city and the rural fire district. Ultimately this would create financial issues for the rural fire district, which would still need to provide services to the eastern portions of the Dixonville area that would not become incorporated into the city as part of this UGB exchange. However, their district taxing area would likely shrink as western portions of the district were incorporated into the city. This would likely create inefficiencies for both the city and the rural fire district in the long term. Emergency response times for all subareas is shown in Exhibit 51. ● <u>School</u> – The Roseburg East/Dixonville subarea is served by the Glide School District making it the least efficient subarea to be incorporated into the City of Roseburg for the purposes of providing school facility services. The Glide School facilities are approximately 12-13 miles from the center point of the subarea. ● <u>Streets</u> – Similar to the Wilbur Subarea, this subarea contains a relatively linear layout along Hwy 138 and Buckhorn Road, it contains approximately 2.4 linear miles of existing street infrastructure. Additionally, the existing street infrastructure is split between ODOT and County maintenance creating inefficiencies for future maintenance and development purposes. 	<p>2</p>
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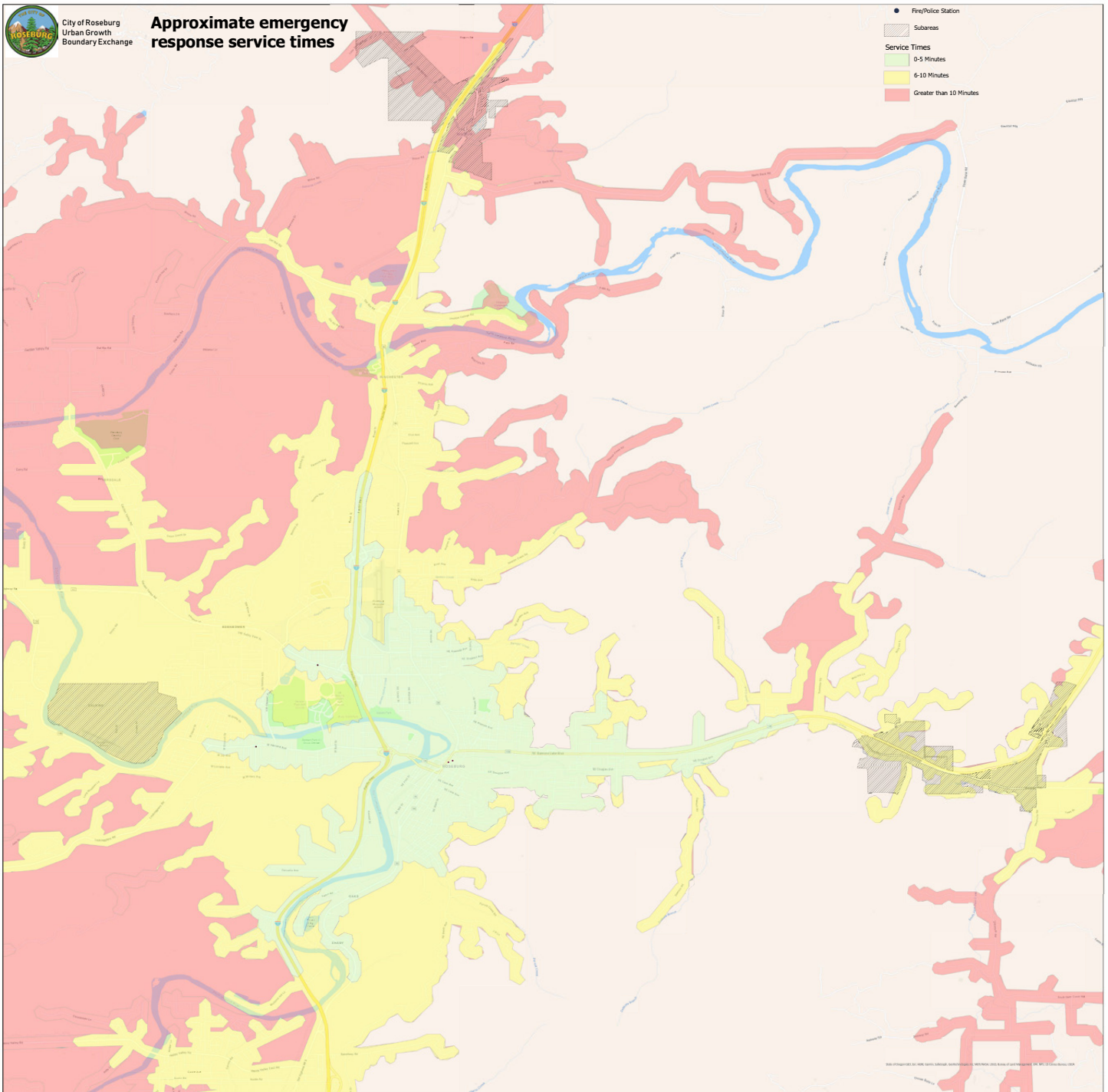


**City of Roseburg
Urban Growth
Boundary Exchange**

**Study Area:
School, Park & Transit Services**




0 0.5 1 2 Miles



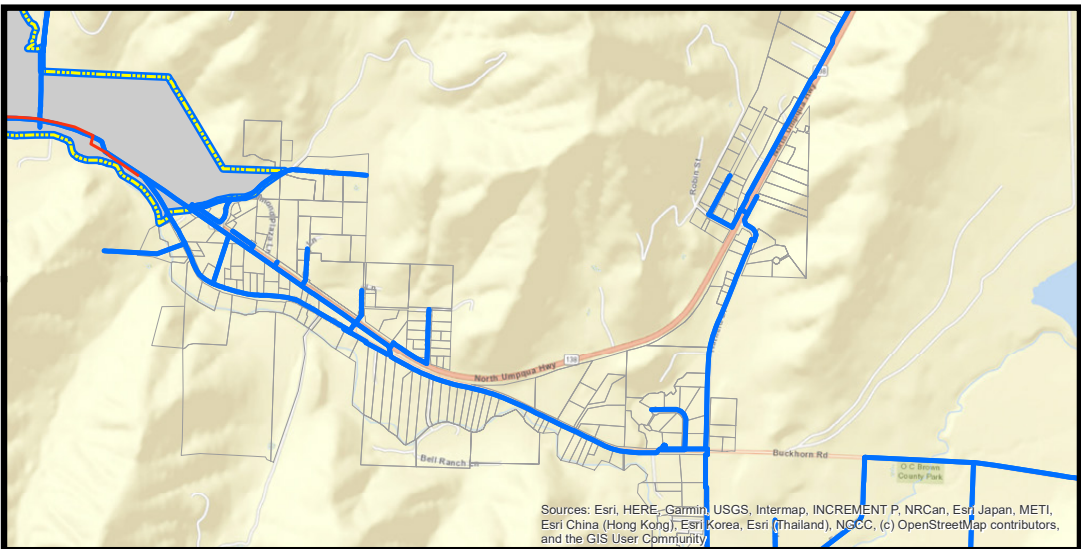
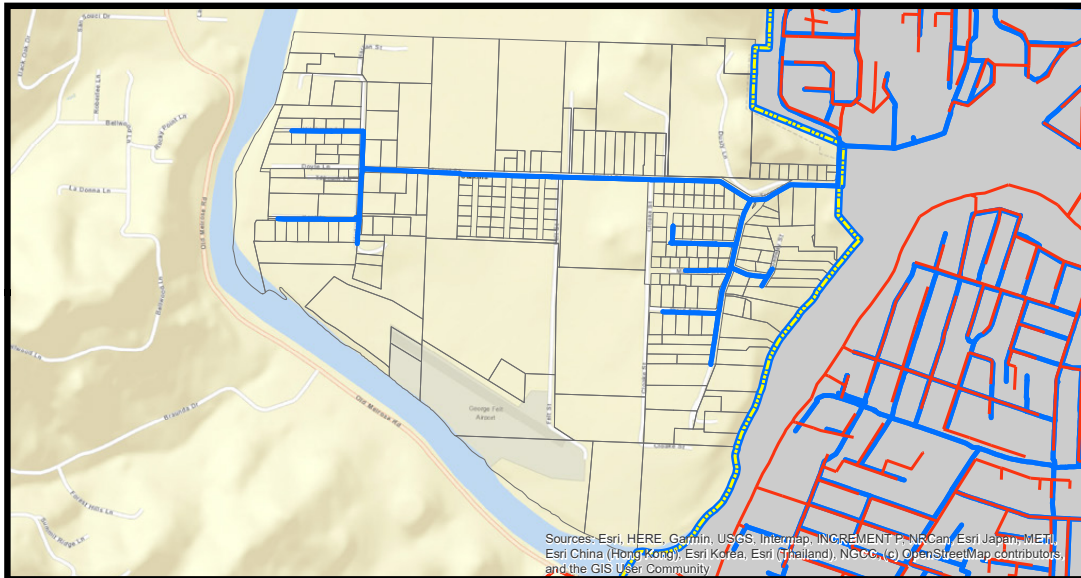
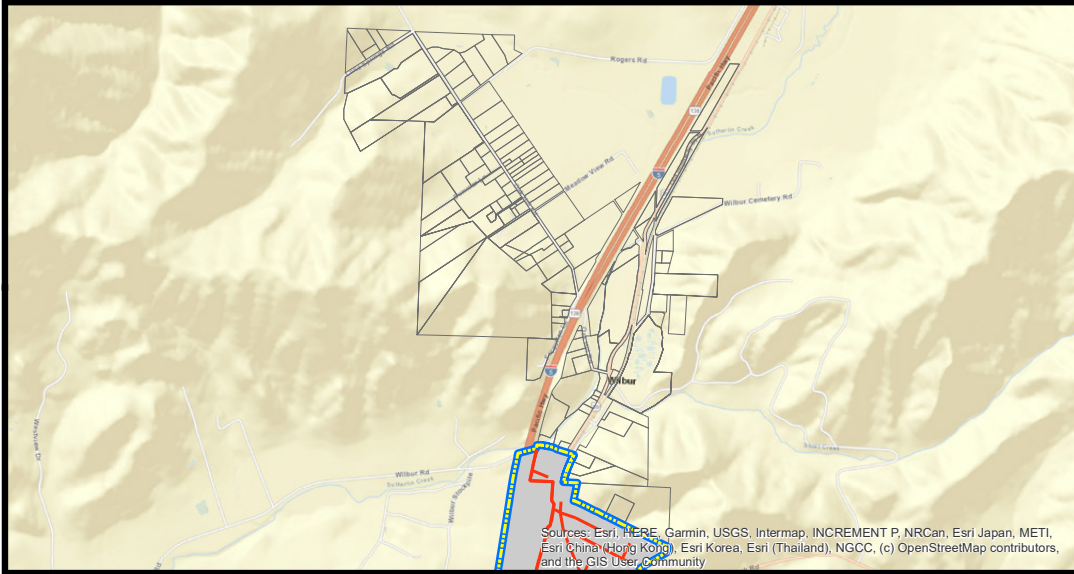




Subarea Water/Sewer Existing Infrastructure

 RUSA Sewer Main  City Water Main  UGB

Insert Exhibit 52 Study Area Sewer/Water Maps



4. GOAL 14 EVALUATION: COMPARATIVE ENVIRONMENTAL, ENERGY, ECONOMIC AND SOCIAL CONSEQUENCES

Table 18, Ranking for Goal 14 Location Factor #3

Subarea	Compatibility	Ranking
Wilbur	<p>The Wilbur subarea does not present good opportunities for comparative environmental, energy, economic and social consequences.</p> <ul style="list-style-type: none"> • Highest coverage of wetlands both by area and percentage (135+- acres or 22.9% of the total) including Sutherlin Creek which is identified in the Douglas County Comprehensive Plan as a “significant wetland” resource (see Exhibits 54 & 55). Significant wetlands are those classified by ODFW as having a good to excellent quality. Urban level residential development would likely be excluded from this area, or have the highest comparative environmental consequences and compatibility conflicts. • The subarea contains the only identified significant White Camas Natural Area Overlay (12.8 acres) in Douglas County (see Exhibit 53). White camas is a rare flower native to the Umpqua Valley which has very few remaining locations where it grows and flourishes. White camas plants have high historical and cultural value as they served as a food source for native residents. In the past, the site was found to be significant enough to warrant the application of the Goal 5 process by Douglas County, resulting in some mediation and limitations with conflicting uses. The proposed urban residential use conflicts with Natural Area Overlay as it could adversely affect or permanently destroy the white camas habitat, leading to high negative environmental consequences. • Remote area and not pedestrian friendly- Wilbur’s community lacks pedestrian infrastructure and is far from the commercial core of Roseburg, basic public facilities and public parks. The closest public park is county-owned John P. Amacher Park, 3.5 miles south in Winchester. The closest city-operated park is Charles Gardiner Park, more than 7 miles south of the subarea. Wilbur is the most remote location which has the worst energy consequences due to increased travel times and traffic. • Due to the amount of slopes in the subarea there are more barriers to housing development which has negative social consequences. • Subarea has lands zoned as rural industrial (ME- 18.1 acres) and small amount of rural community commercial (CRC- .73 acres). The City has assessed no need to obtain additional employment lands, and rezoning committed employment lands to residential without an alternative has negative economic consequences. Creating residential neighborhoods around a rural industrial area creates compatibility issues that could have negative social consequences. 	2

Charter Oaks	<p>The Charter Oaks subarea presents good opportunities for comparative environmental, energy, economic and social consequences.</p> <ul style="list-style-type: none"> • Lowest coverage of wetlands both by total area and percentage of subarea (72.1 acres or 15%). Some areas may need to be mitigated, additional wetland delineation would help define these areas with more granularity (see Exhibit 56). • This subarea can share an upgraded pump station with the Loma Vista neighborhood, thus reducing energy costs for brand new sewer pump stations. • Subarea has land owned by the Roseburg School District that will be designated as Public / Semi Public Use that could offer a suitable opportunity for expansion of the school district, therefore will directly meet a portion of the city's long-term public / semi-public land need. A mix of compatible land uses within a future neighborhood system has positive social consequences. • Subarea is immediately adjacent to already urbanized residential areas with small parcelization and urban public improvements, as opposed to the other subareas which are set out in remote rural communities. This subarea is best located to commence development that will meet the 20-year housing goals. • Inclusion of this subarea into the UGB would ultimately increase traffic on Troost St and local streets in the adjacent residential area already incorporated into the City. However, the proximity of the subarea to the urban commercial core means that this area will result in shorter travel times than the other subareas, resulting in positive energy consequences. Traffic impacts identified in the Traffic Impact Study (TIS) will need to be fully addressed with mitigation as development grows. 	1
Roseburg East/ Dixonville	<p>The Roseburg East/Dixonville subarea does not present good opportunities for comparative environmental, energy, economic and social consequences.</p> <ul style="list-style-type: none"> • Subarea has 5 historic landslide records along Highway 138, where there is rural residential zoning, according to the Oregon DOGAMI Statewide Landslide Information Database (see Exhibit 58). Urban development in a landslide prone area has negative environmental and social consequences. • Second highest coverage of wetlands both by total acreage and percentage of subarea (87.6 acres/563 acres = 15.5%). Roughly equivalent amount as the Charter Oaks subarea with some gathered along the Deer Creek riparian corridor. However much of those wetlands are concentrated in undeveloped committed residential lands, which has negative environmental consequences for future neighborhood development (see Exhibit 57). • Subarea has a significant amount of area currently zoned as rural community industrial (MRC- 72.3 acres or approximately 12% of subarea) on the western edge that borders the current UGB, and a small amount zoned as rural community commercial (CRC- 3.3 acres). The City has assessed no need to obtain additional employment lands, and rezoning committed employment lands to residential without an alternative has negative economic consequences. Locating residential neighborhoods near community commercial land has positive economic consequences, but close proximity to rural industrial operations has potentially negative social consequences. • Area is served by Glide School District, whose nearest facilities are located more than 12 miles northeast. Increased residential development has negative energy and social consequences due to facilities being inaccessible by walking or biking, increased reliance on automotive transit to commute to and from school. The school district may also be burdened by urban levels of students at the edge of their boundary. 	3

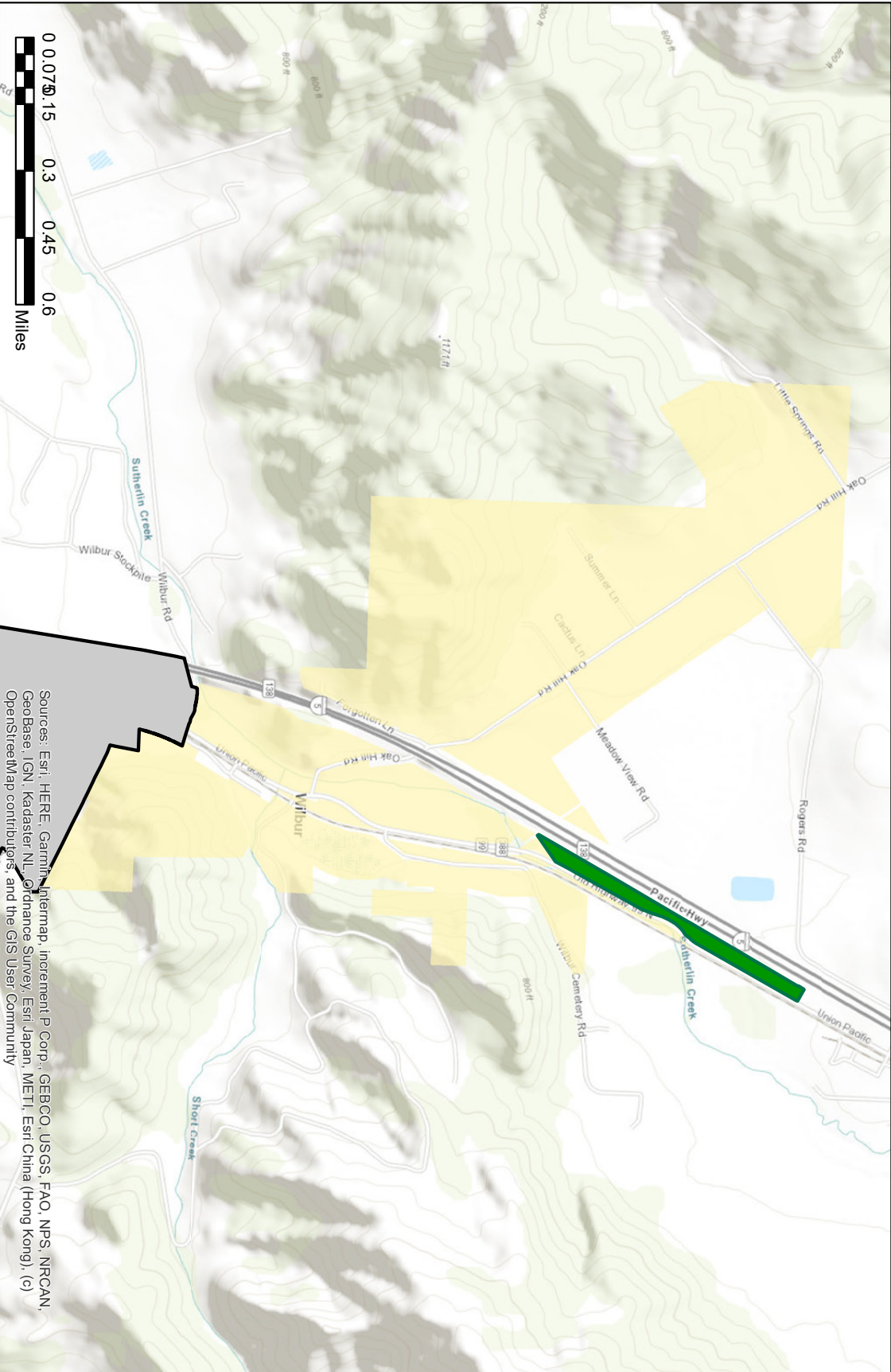
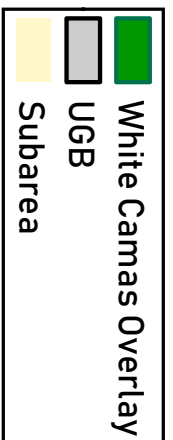


Exhibit 53, Subarea #1 (Wilbur) White Camas Natural Area Overlay Map

City of Roseburg Urban Growth Boundary Exchange

White Camas Natural Area Overlay

Subarea #1- Wilbur



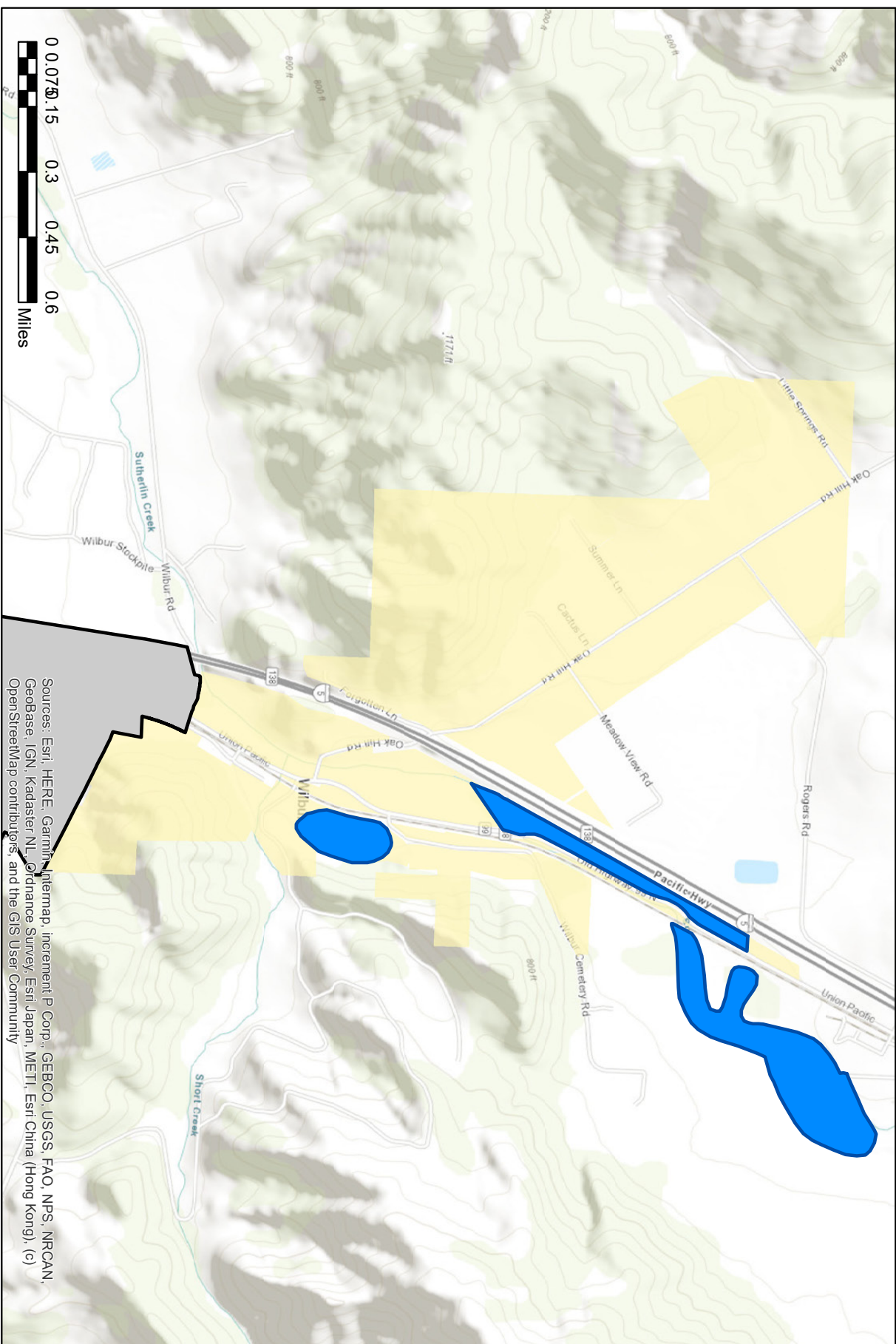
Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community



**City of Roseburg
Urban Growth
Boundary Exchange**

**Subarea #1 (Wilbur) Significant
Wetlands Overlay Map**

Exhibit 54, Subarea #1 (Wilbur) Significant Wetlands Overlay Map

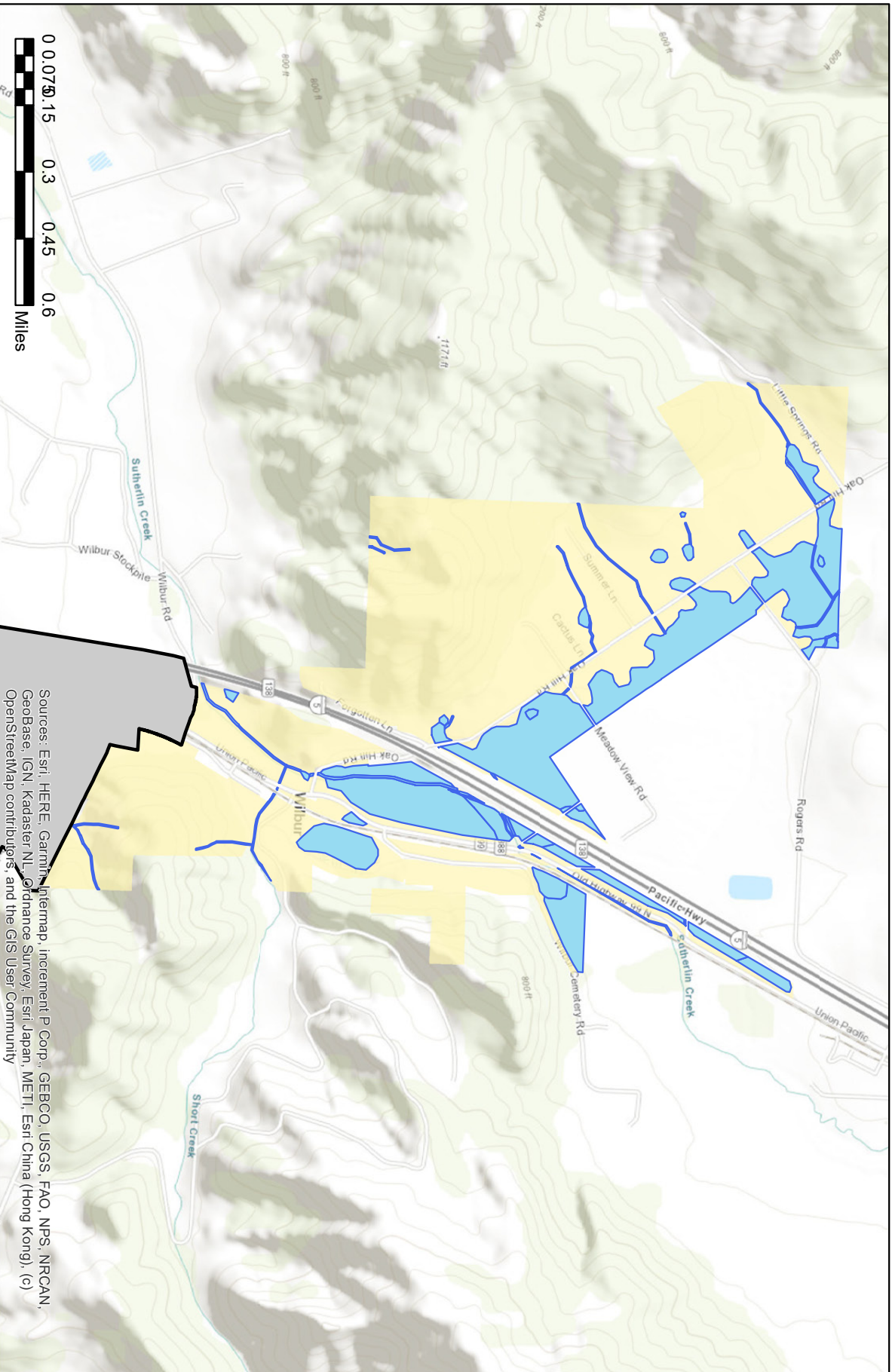


Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community



City of Roseburg Urban Growth Boundary Exchange Statewide Wetlands Inventory Subarea #1- Wilbur

Exhibit 55, Subarea #1 (Wilbur) Wetlands Map



Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community

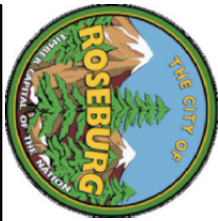
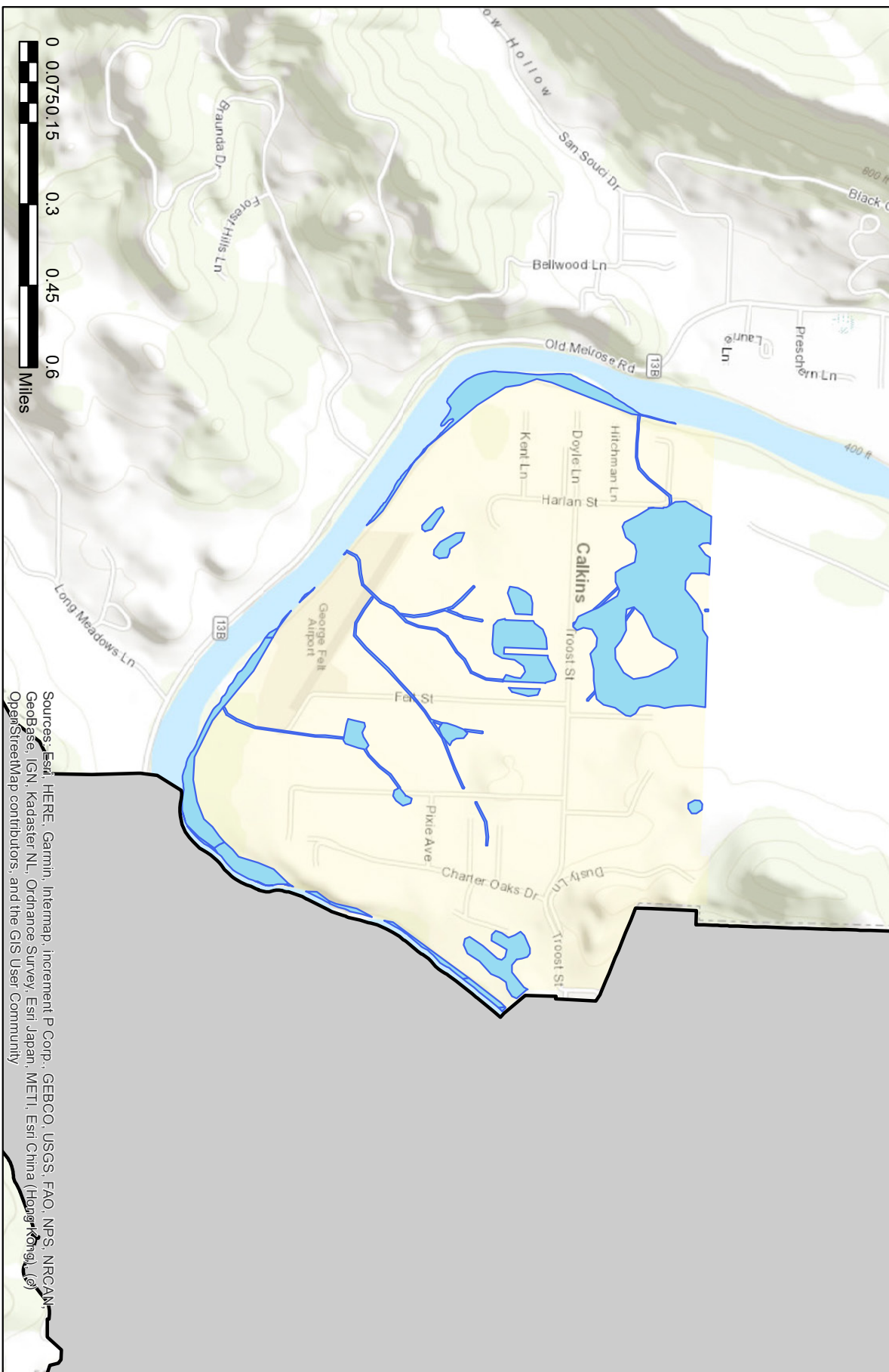
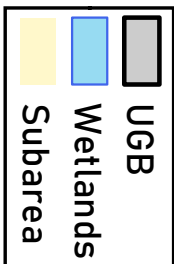


Exhibit 56, Subarea #5 (Charter Oaks) Wetlands Map

City of Roseburg Urban Growth Boundary Exchange Statewide Wetlands Inventory Subarea #5 - Charter Oaks



Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, Geobase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), Swisstopo, Mapbox, and the GIS User Community

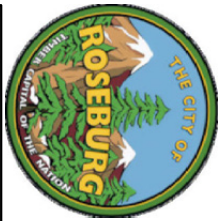
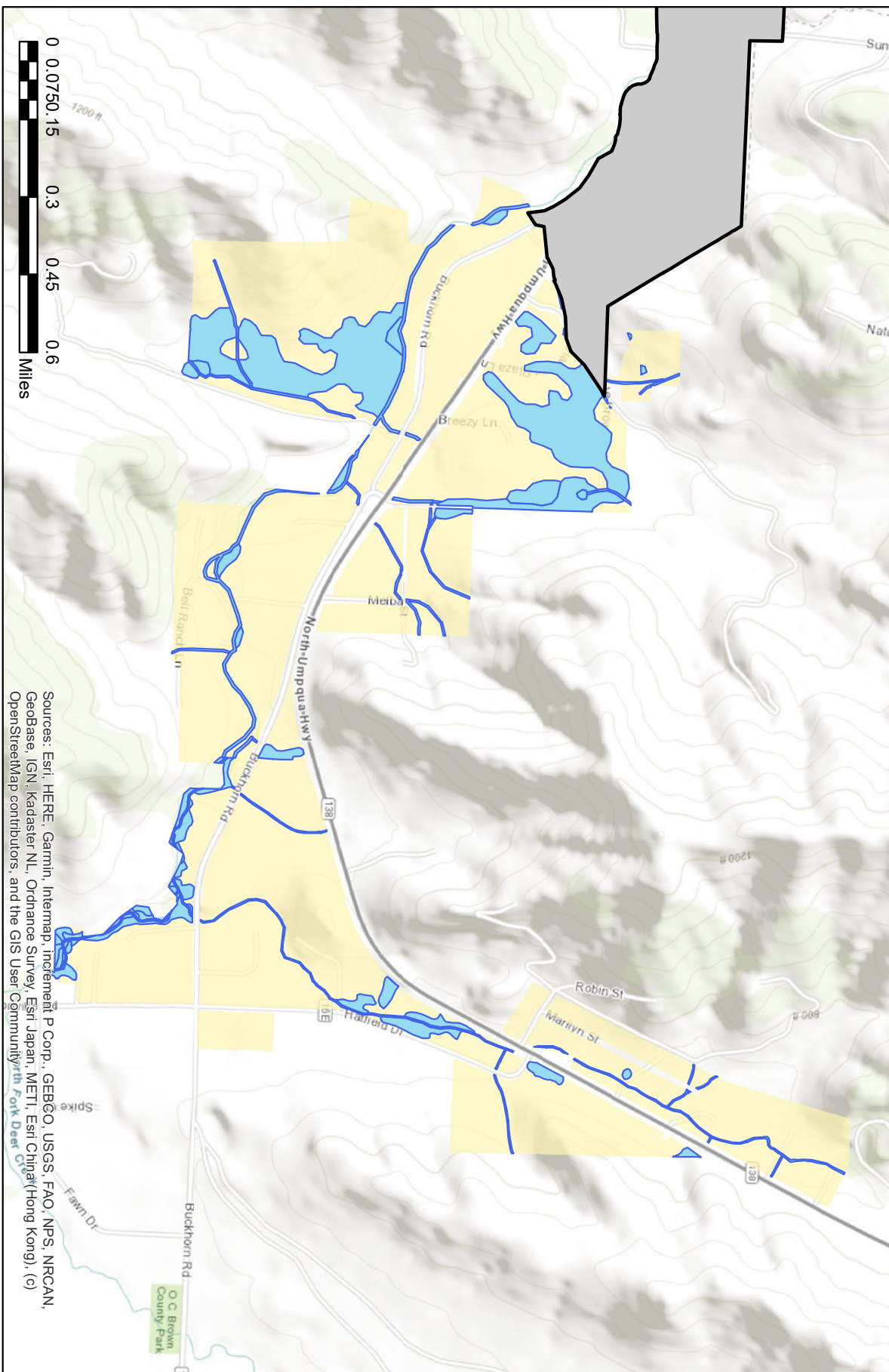
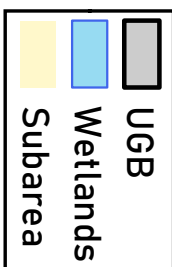


Exhibit 57, Subarea #11 (East Roseburg Dixonville) Wetlands Map

City of Roseburg Urban Growth Boundary Exchange

Statewide Wetlands Inventory

Subarea #11 - East Roseburg / Dixonville









Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community

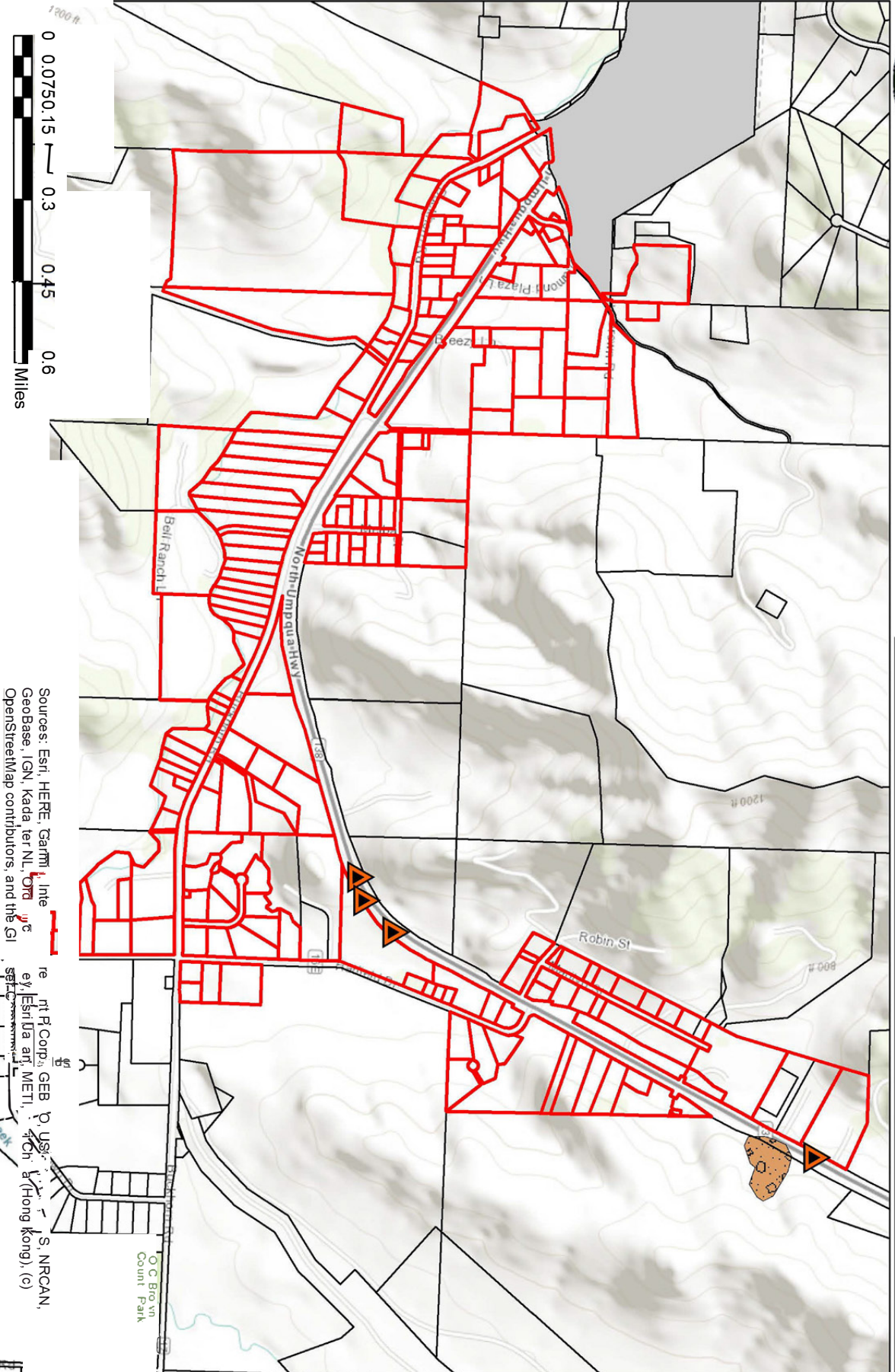


Exhibit 56, Subarea #11 (East Roseburg, Dixonville) Landslide Hazard Map

Landslide Hazards in East Roseburg Dixonville Subarea

 Historically Active Landslide Points (1849-2011)
 Dixonville Subarea
 UGB

Deposits
DESCRIPTION
 Talus-Colluvium
 Fan
 Landslide



Sources: Esri, HERE, Garmin, Intel, GeoBase, IGN, Kadner NL, OpenStreetMap contributors, and the GIS User Community

5. GOAL 14 EVALUATION: COMPATIBILITY OF THE PROPOSED URBAN USES WITH NEARBY AGRICULTURAL AND FOREST ACTIVITIES ON FARM AND FORESTLAND OUTSIDE THE URBAN GROWTH BOUNDARY.

In general, the City finds that the proposed low-density residential use needed for this UGB exchange would have limited compatibility issues with the three subareas, mainly due to the fact that rural residential development already exists to some extent within each general area. However, the City has based the evaluation on which subarea may have the least potential conflict with current or future agricultural and forest activities. This was done by analyzing the amount, parcelization, and soil class of surrounding farm and forestland.

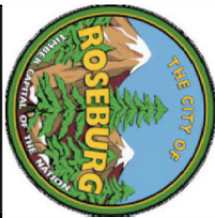
For the purpose of this evaluation, parcels within 500 feet of the study area boundaries were analyzed. Some parcels within each subarea's 500 foot buffer were removed from the analysis if there was a feature which acts as a barrier of separation from the subarea. For Wilbur this includes parcels that are separated from the subarea by Interstate 5 or Highway 99. For Charter Oaks this includes parcels that are separated from the subarea by the South Umpqua River. For East Roseburg/Dixonville this includes parcels that are separated from the subarea by Highway 138.

Table 19, Ranking for Goal 14 Location Factor #4

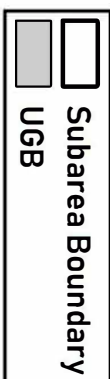
Subarea	Compatibility	Ranking
Wilbur	<p>The Wilbur subarea does not present good compatibility of the proposed urban uses with nearby agricultural and forest activities on farm and forestland outside the urban growth boundary for the following reasons:</p> <ul style="list-style-type: none"> • The subarea's lengthy linear shape means there are more direct conflicts with farm and forestland. The perimeter of the subarea shares nearly 8 miles of boundary lines with farm and forest zoned parcels. • There is no gradual transition from urban land to resource land densities- there are several large farm & forest tracts over 80 acres in size, and 2 extra large parcels over 160 acres directly abutting the subarea. (see Exhibit 59) • Approximately 45% of all the soils surrounding the study area have a forest productivity classification greater than 100 cubic feet per acre per year (see Exhibit 62). This puts a significant amount of high productivity forestland in close proximity to urban development. • Soil capability class of the adjacent parcels is as follows: (see exhibit 64) <ul style="list-style-type: none"> ○ Class VII- 87.1 acres (6.1%) ○ Class VI- 635.1 acres (43.5%) ○ Class IV- 346.9 acres (23.8%) ○ Class III- 303.5 acres (20.8%) ○ Class II- 83.2 acres (5.8%) <p>This subarea also has the highest acreage of Class II and Class III soils. Much of that is located to the north on the east side of Oak Hill Rd, an area that is generally flat with little obstruction from the subarea. Satellite imagery indicates there is a level of agricultural activity in the vicinity, creating the potential for current and future conflicts.</p>	3

<p>Charter Oaks</p>	<p>The Charter Oaks subarea presents good compatibility of the proposed urban uses with nearby agricultural and forest activities on farm and forestland outside the urban growth boundary for the following reasons:</p> <ul style="list-style-type: none"> • The subarea's comparatively compact shape means there are less direct conflicts with farm or forest zoned land for the continued resource use to the south of the subarea, and to the north of the subarea. The subarea has approximately one mile of shared boundary lines with farmland, approximately 8 times less than the other subareas. The current UGB abuts the entire easterly length of the subarea and the South Umpqua River wraps around the east, south, and west sides. The river provides a natural buffer that separates urban development and rural areas. The lands across the bank of the South Umpqua River are entirely zoned rural residential, which provide no compatibility conflict with a UGB exchange to this subarea. • Farmland abuts the subarea directly to the west, north, and to the south. To the north, there are 4 parcels of Exclusive Farm Use -- Grazing (FG) zoned land all between 15-55 acres in size (see Exhibit 60). To the west, there is one parcel that is approximately 15 acres. To the south, there are 6 parcels that range from 10-40 acres in size. These parcels are below the minimum lot size of 80 acres for land zoned exclusive farm use per ORS 215.780, which does not preclude them from agricultural activity, however it does mean the likelihood of conflicts with large-scale commercial farming is lower. Continued resource use in these abutting farmlands would be uninterrupted, and existing farming practices could continue and be compatible to surrounding uses. The current farming practices on these parcels around the subarea would be uninterrupted by an increase in urban uses. There is very little access to viable irrigation in this area. One property in the subarea is receiving special farm use tax assessment (R152265). The property owner was contacted to confirm that their property has been used for haying, which is supported by historical aerial imagery. The property owner represents that "we are solely using the property for hay. You are correct, we are solely using the property for hay. Unfortunately the property does not have access to viable irrigation, so the yields are not strong and the nutrient density is low-meaning that the grazing is not the best option either. The impacts to historical farm use would be negligible." • No forestland exists within the near vicinity of the subarea, eliminating the possibility of conflicts. No soils surrounding the subarea have a high forest productivity rating. • The western end of the subarea along Harlan Street contains a large area of existing rural residential development that is relatively dense next to existing farmland. • Urban development within the UGB in the Loma Vista neighborhood has historically co-existed next to the FG parcels north of the subarea with little conflict. A sloped ridgeline provides some topographical separation of the two uses. This slope continues south slightly into the subarea and also helps buffer eastern parts of the subarea from FG parcels to the north. • Soil capability class of the adjacent parcels is as follows: (see Exhibit 65) <ul style="list-style-type: none"> ○ Class VI- 48.5 acres (41.4%) ○ Class IV- 14.6 acres (12.5%) ○ Class III- 30.0 acres (25.6%) ○ Class II- 23.9 acres (20.5%) <p>Distribution of soil class across the agricultural area notes that there are Lower Class VII soils to the east, closer to the current UGB and higher class soils to the west on Jones Rd. While there is some higher class agricultural land on the perimeter of the subarea, the total acreage is comparatively smaller than other subareas.</p>	<p>1</p>
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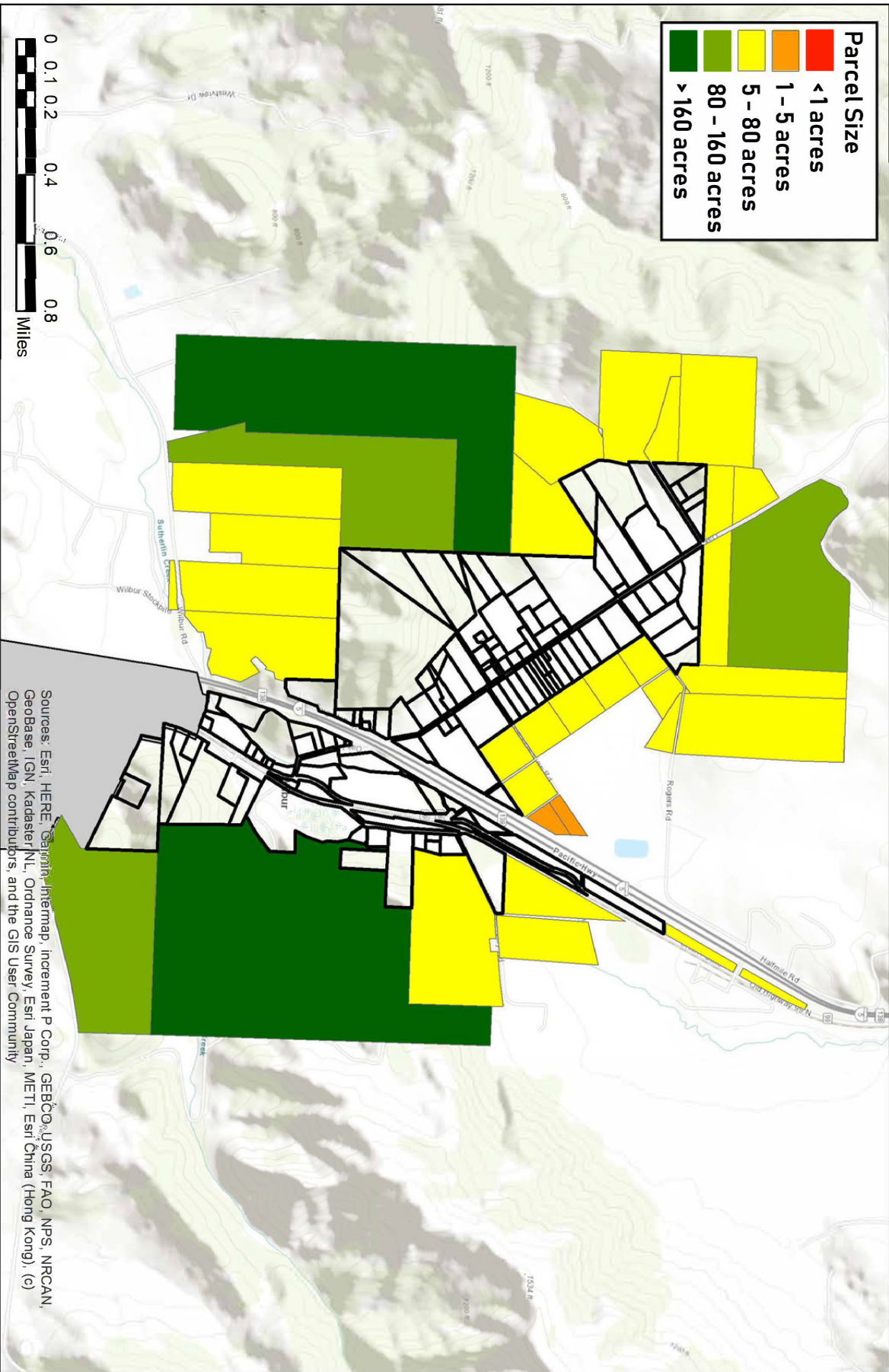
Roseburg East / Dixonville	<p>The Roseburg East/Dixonville subarea does not present good compatibility of the proposed urban uses with nearby agricultural and forest activities on farm and forestland outside the urban growth boundary.</p> <ul style="list-style-type: none"> • The subarea's lengthy and linear shape means there are more direct conflicts with farm and forestland. The perimeter of the subarea shares approximately 8.1 miles of boundary lines with farm and forest zoned parcels. • Large parcels of farm and forest zoned land surround the subarea- there are several large tracts over 80 acres in size, and a handful over 160 acres. (see Exhibit 61) • Less than 4% of the soil (approx. 65 acres) surrounding the subarea has a forest productivity rating higher than 100 cubic feet per acre per year. The likelihood for conflicts with forestland is significantly lower than the Wilbur subarea but higher than the Charter Oaks subarea (see Exhibit 63). • Soil capability class of the adjacent parcels is as follows: (see Exhibit 66) <ul style="list-style-type: none"> ○ Class VI- 1378.8 acres (72.3%) ○ Class IV- 54.4 acres (2.9%) ○ Class III- 440.2 acres (23.1%) ○ Class II- 16.2 acres (0.9%) ○ Class I- 16.0 acres (0.8%) <p>The most prevalent soil classes are Class VII and Class III. Distribution of soil class across the agricultural area notes that most of the sloped areas surrounding the subarea have a low soil class, while flatter areas near existing development or within canyons generally have higher value. This subarea has the highest amount of Class III soil in the surrounding farm and forest parcels. There is presence of Class I and II in the south along Deer Creek, which is also prevalent within the subarea itself. It's assumed that commercial agricultural operations would not occur inside the exception lands, however that assumption does not hold for the resource lands abutting the subarea.</p>	2
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Size of Farm Forest (FF) and Farm Grazing (FG) Parcels Within 500 Feet of Subarea #1 (Wilbur) Factor 4 Agricultural and Forest Activity Compatibility



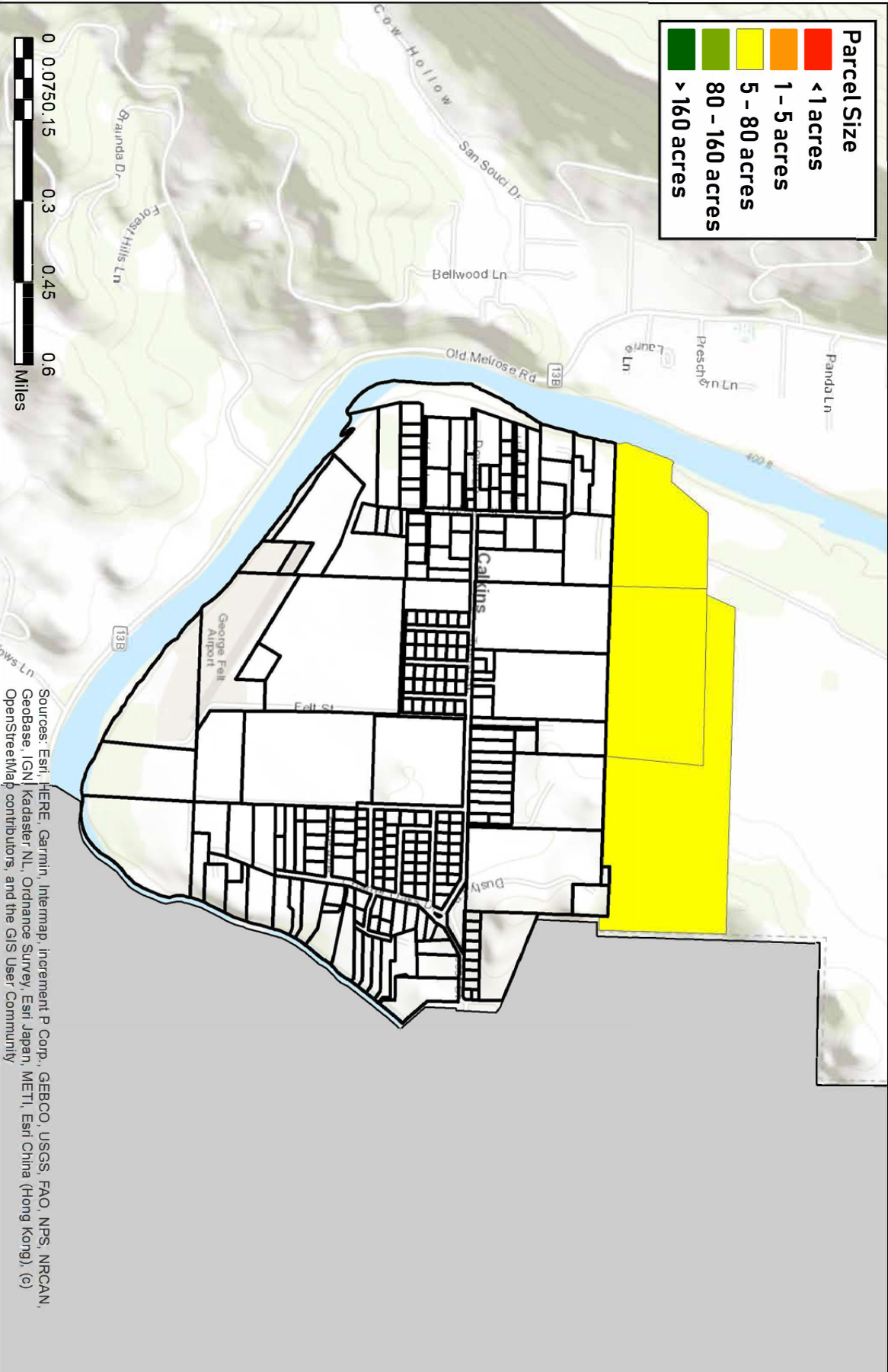
Parcel Size
< 1 acres
1 - 5 acres
5 - 80 acres
80 - 160 acres
> 160 acres



Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community



Size of Farm Forest (FF) and Farm Grazing (FG) Parcels Within 500 Feet of Subarea #5 (Charter Oaks) Factor 4 Agricultural and Forest Activity Compatibility

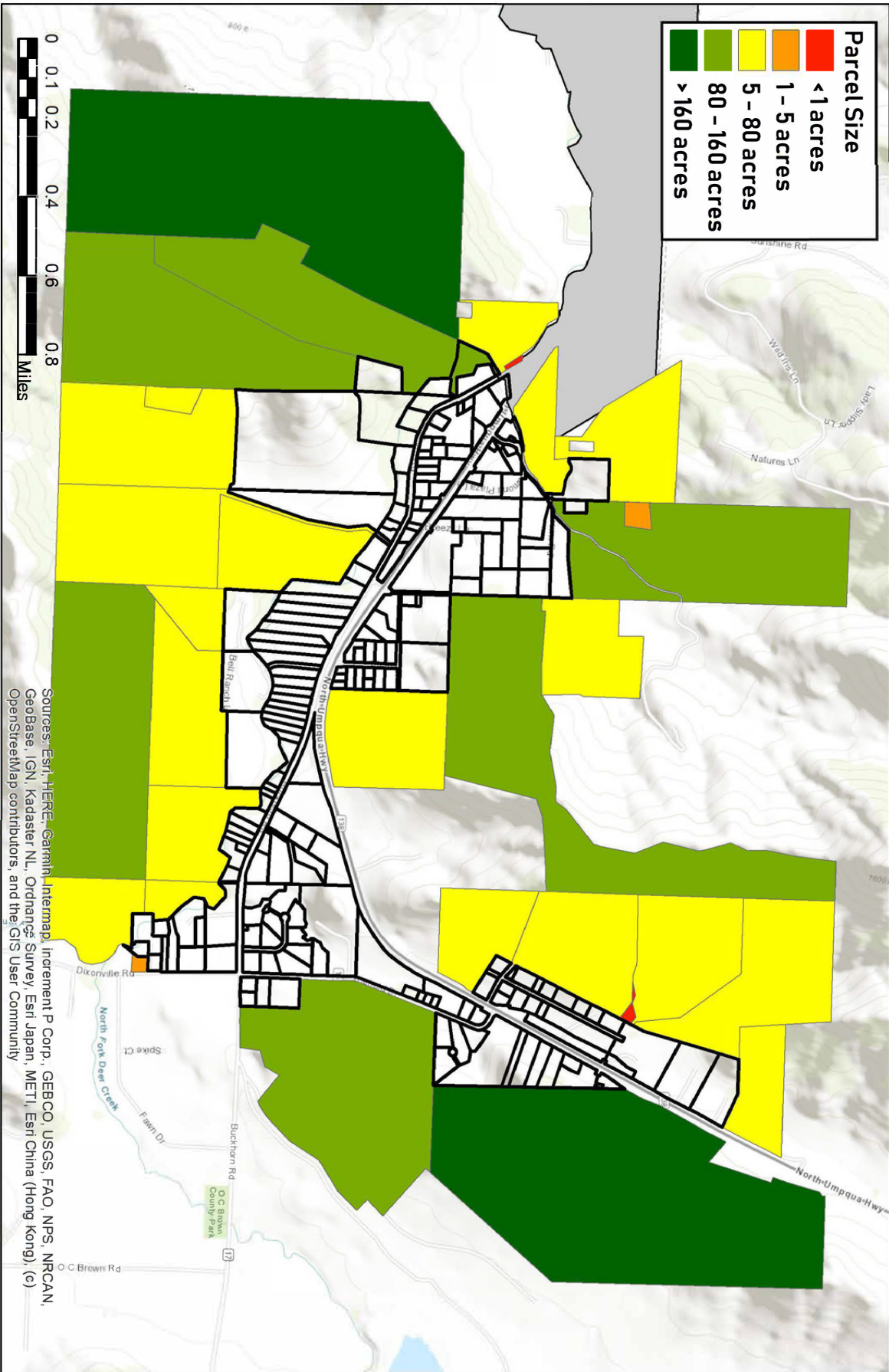


Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community



Exhibit 61, Subarea #11 (Dixonville) Farm & Forest Parcel Size Compatibility Map

Size of Farm Forest (FF) and Farm Grazing (FG) Parcels
Within 500 Feet of Subarea #11 (East Roseburg Dixonville)
Factor 4 Agricultural and Forest Activity Compatibility



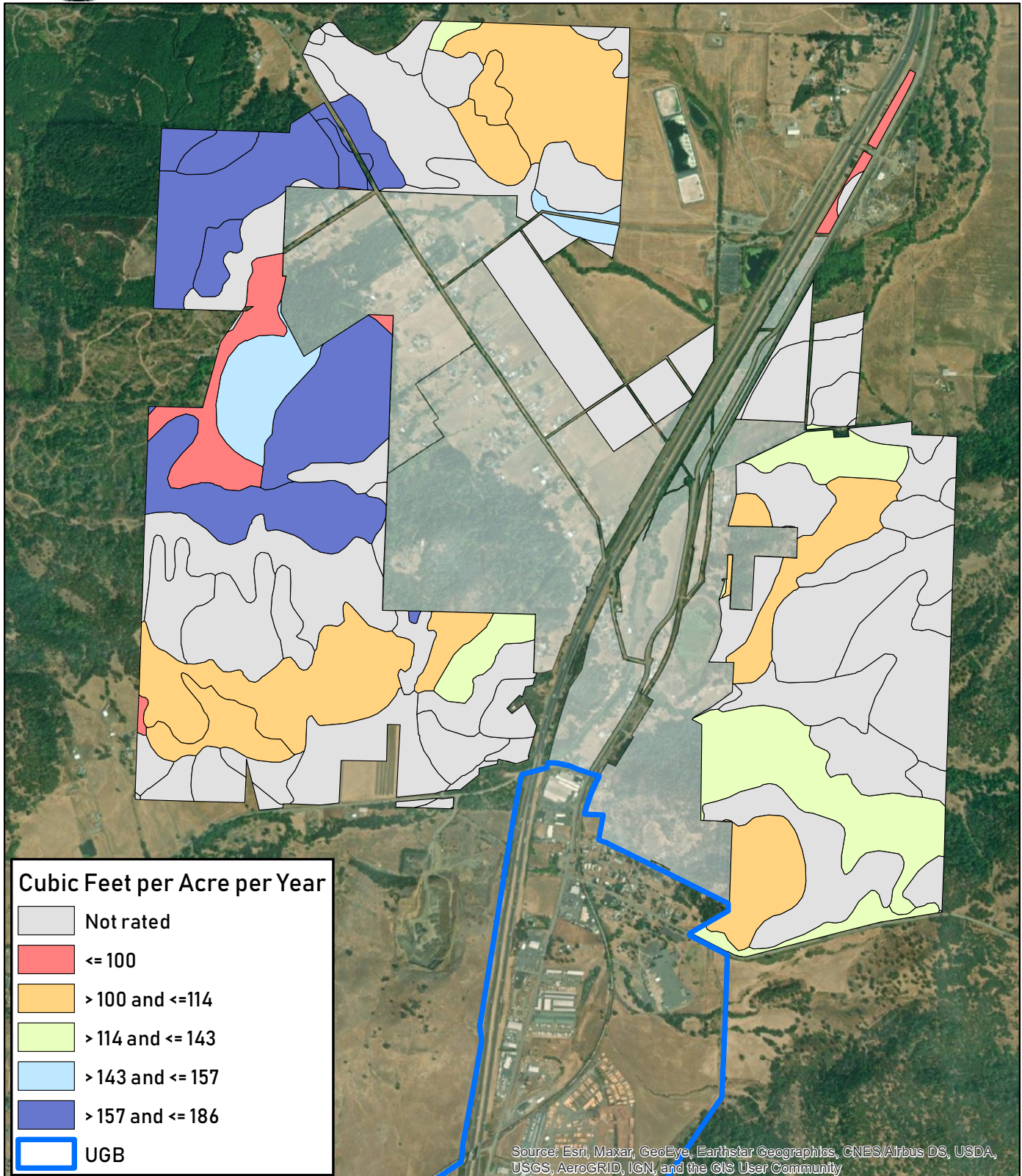


City of Roseburg
Urban Growth
Boundary Exchange

Subarea #1 (Wilbur) Forest Productivity
of Surrounding Farm & Forest Lands



0 550 1,100 2,200 3,300 4,400 Feet



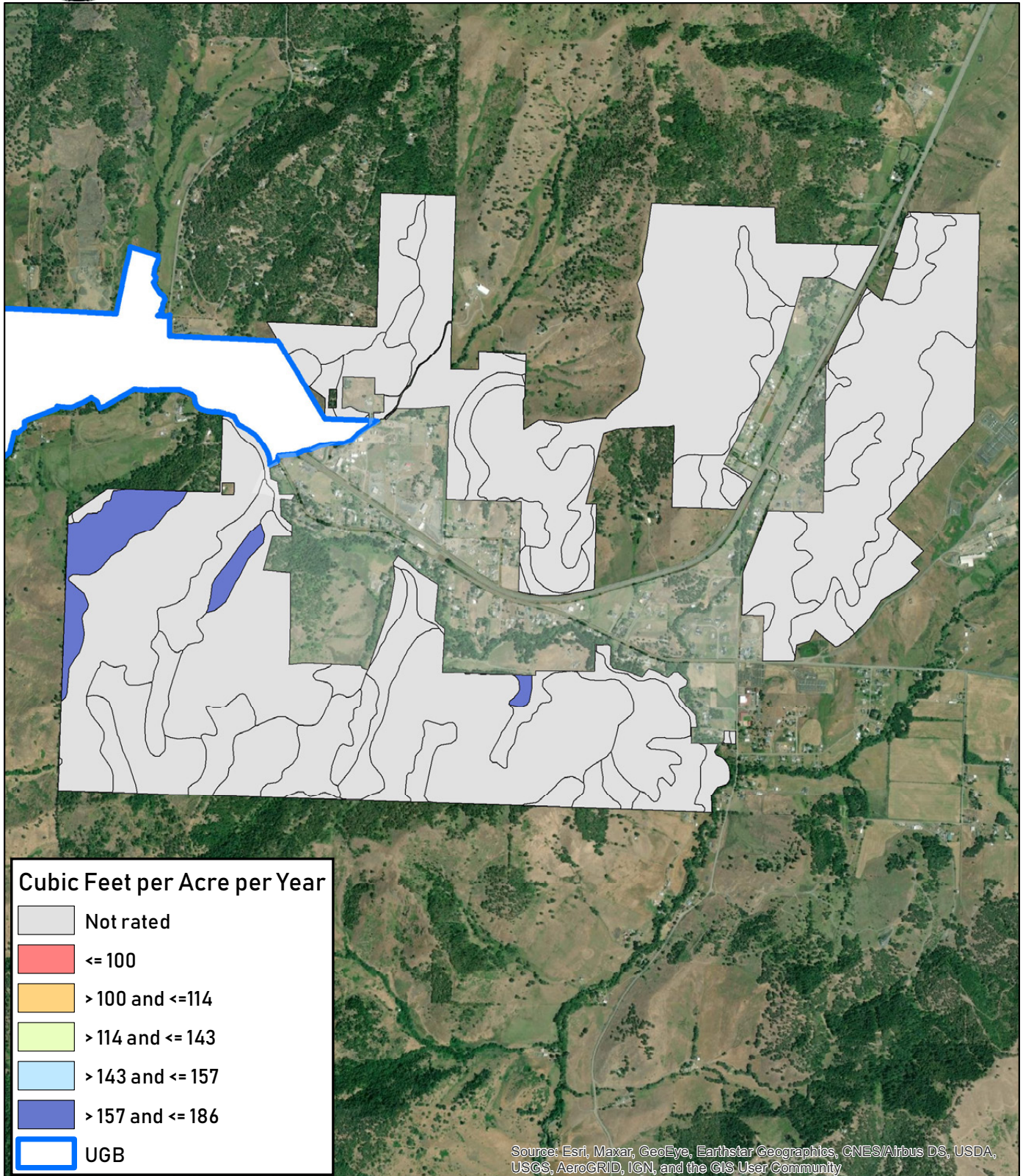


**City of Roseburg
Urban Growth
Boundary Exchange**

**Subarea #11 (East Roseburg/Dixonville) Forest
Prod. of Surrounding Farm & Forest Lands**



0 700 1,400 2,800 4,200 5,600 Feet

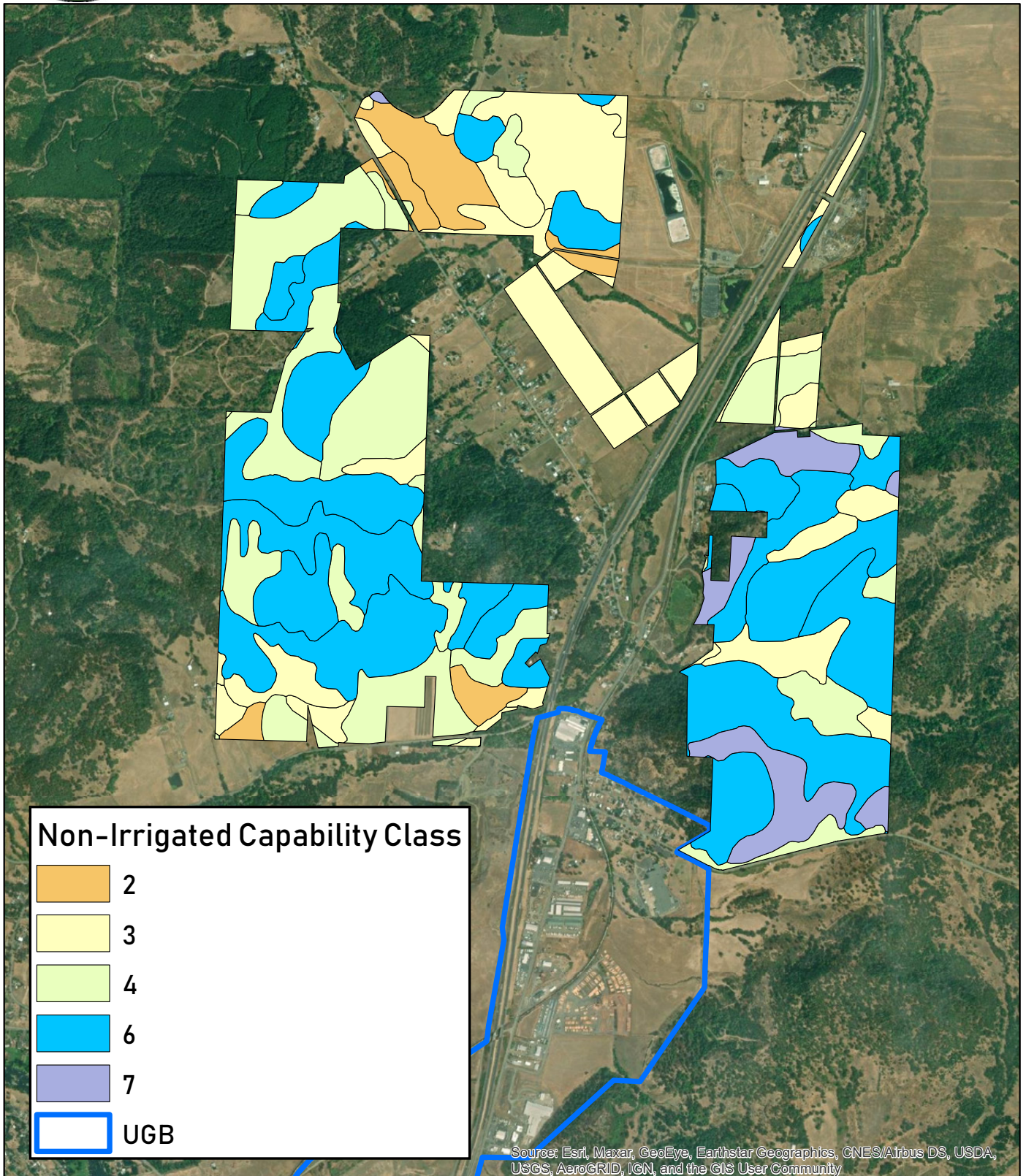




City of Roseburg
Urban Growth
Boundary Exchange

Subarea #1 (Wilbur)
Soil Class of Surrounding Farm & Forest Lands

0 650 1,300 2,600 3,900 5,200 Feet



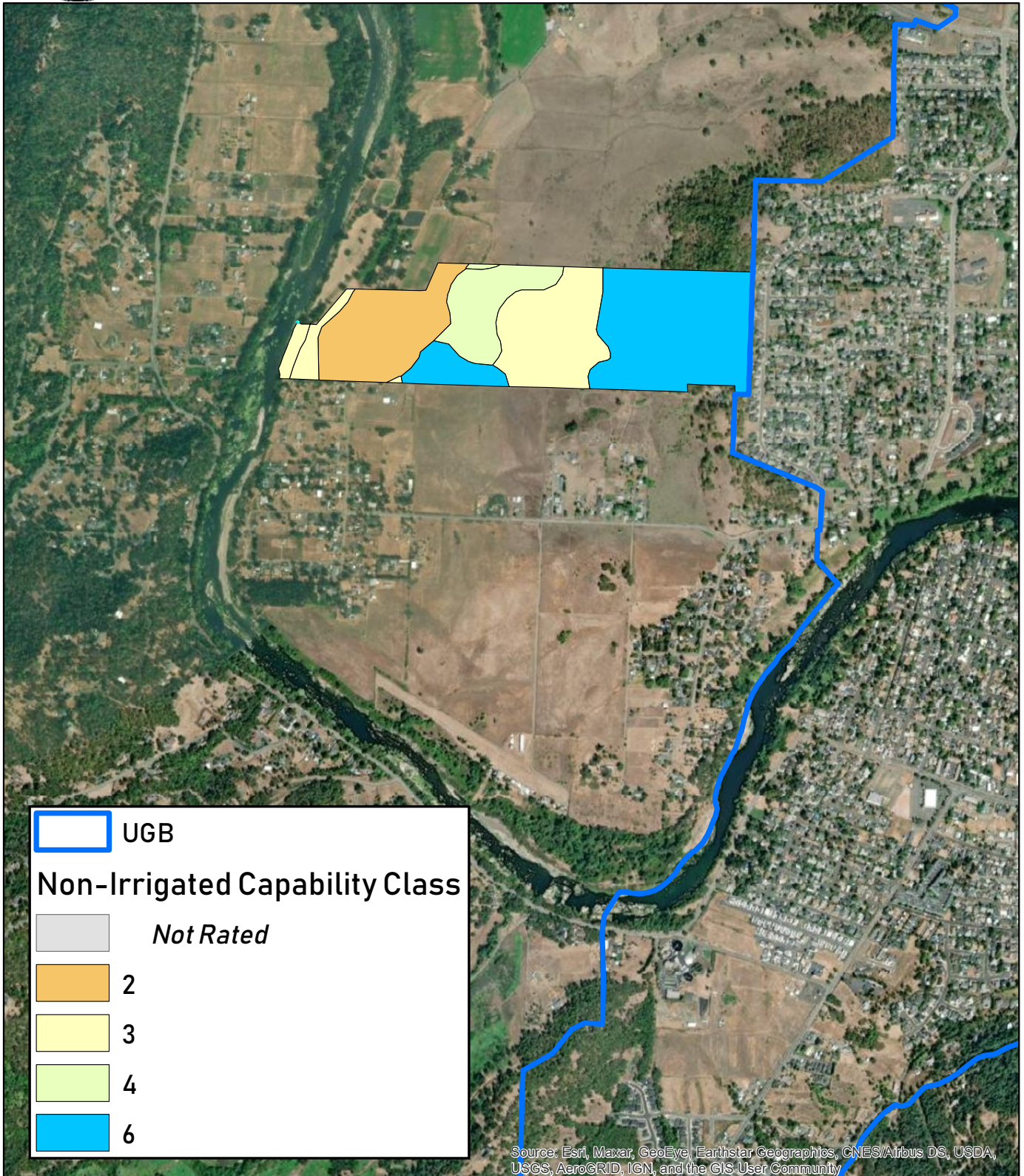


City of Roseburg
Urban Growth
Boundary Exchange

Subarea #5 (Charter Oaks)
Soil Class of Surrounding Farm & Forest Lands



0 425 850 1,700 2,550 3,400 Feet



Source: Esri, Maxar, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

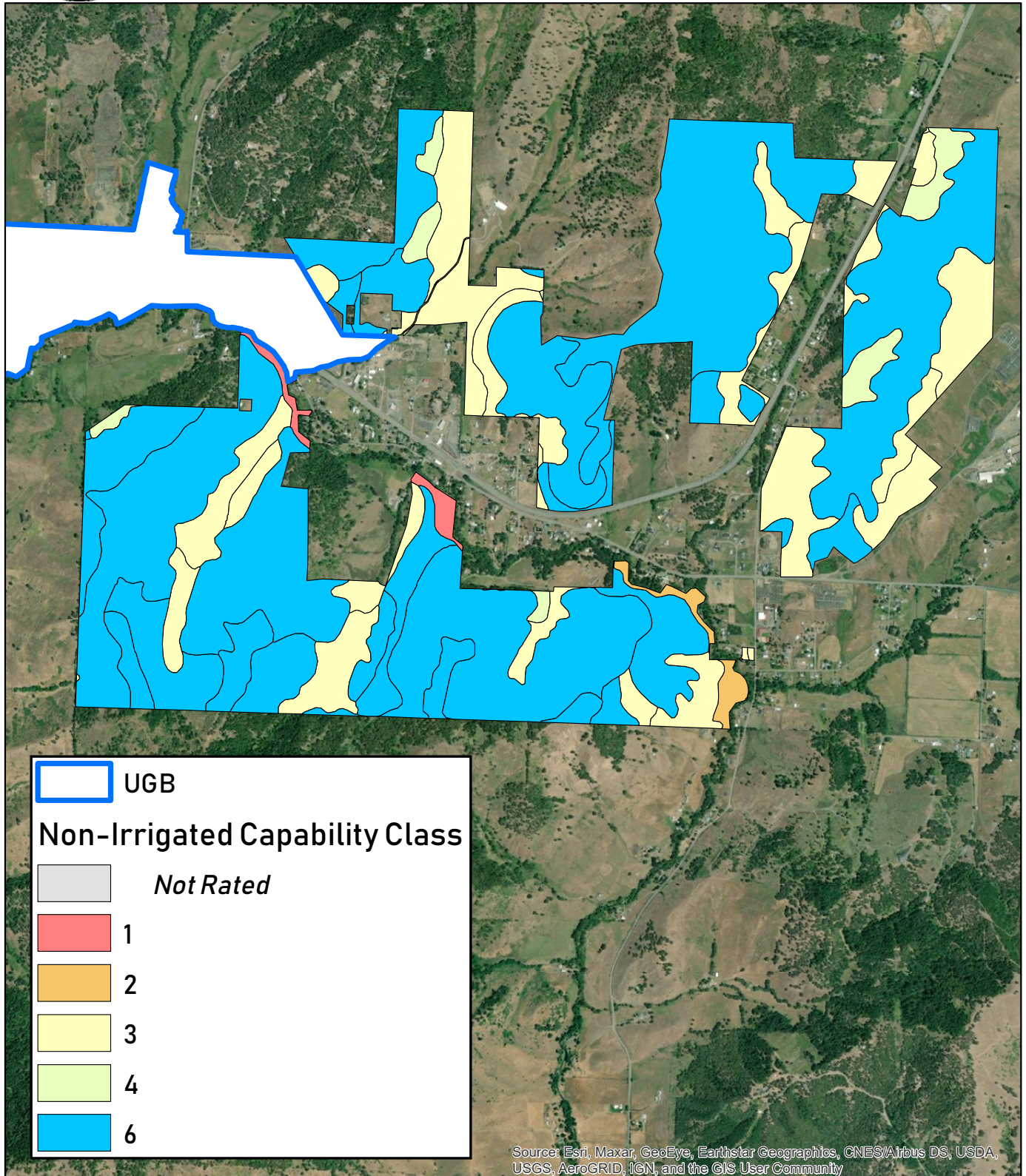


**City of Roseburg
Urban Growth
Boundary Exchange**

**Subarea #11 (East Roseburg / Dixonville)
Soil Class of Surrounding Farm & Forest Lands**



0 700 1,400 2,800 4,200 5,600 Feet



6. FINAL SELECTION OF UGB EXCHANGE AREA

In order to select a final Exchange Area for inclusion in the UGB, the subareas were ranked from best potential site (1), to worst potential site (3), for the priority lands criteria in OAR 660-024-0067(2) and for each of the Goal 14 Boundary Location factors. The subarea with the lowest total score is determined to be the preferred area for the exchange.

Table 20, Final Ranking of Study Area Subareas

	Criteria Ranking					
<u>Subarea</u>	660-024-0067 Prioritization Analysis	Location Factor #1: Development Efficiency	Location Factor #2: Public Facilities & Services	Location Factor #3: ESEE	Location Factor #4: Compatibility	Total
Wilbur	2	3	3	2	2	12
Charter Oaks	3	1	1	1	1	7
Roseburg East/ Dixonville	1	2	2	3	3	11

The Charter Oaks subarea has the combined lowest score for the Prioritization Analysis and the Goal 14 Evaluation, therefore it has been selected as the Exchange Area for this proposal. Further analysis in this proposal will include reducing the subarea in size to best meet the requirements of the exchange.

F. REFINEMENT OF SUBAREA SELECTED FOR EXCHANGE AREA

The initial boundaries of each subarea were developed based on the amount of land included within the 1.5 mile buffer, pursuant to OAR 660-024-0065. However, further refinement of the final subarea, Charter Oaks, is necessary in order to achieve two final considerations for the exchange area: 1) The subarea needs to be reduced to a size that is “in-kind” to the density of the land being removed from the UGB as part of the overall land exchange; 2) Lands that currently lie within the subarea boundaries, for various reasons, do not align with the overall goals and objectives of the project or otherwise create issues with consistency for the Statewide Plan Goals/Local Comprehensive Policies. This is the opportunity for the City to remove some of the identified high-value farmland and other resource lands from the Charter Oaks subarea and determine the final Exchange Area with the correct density for the exchange.

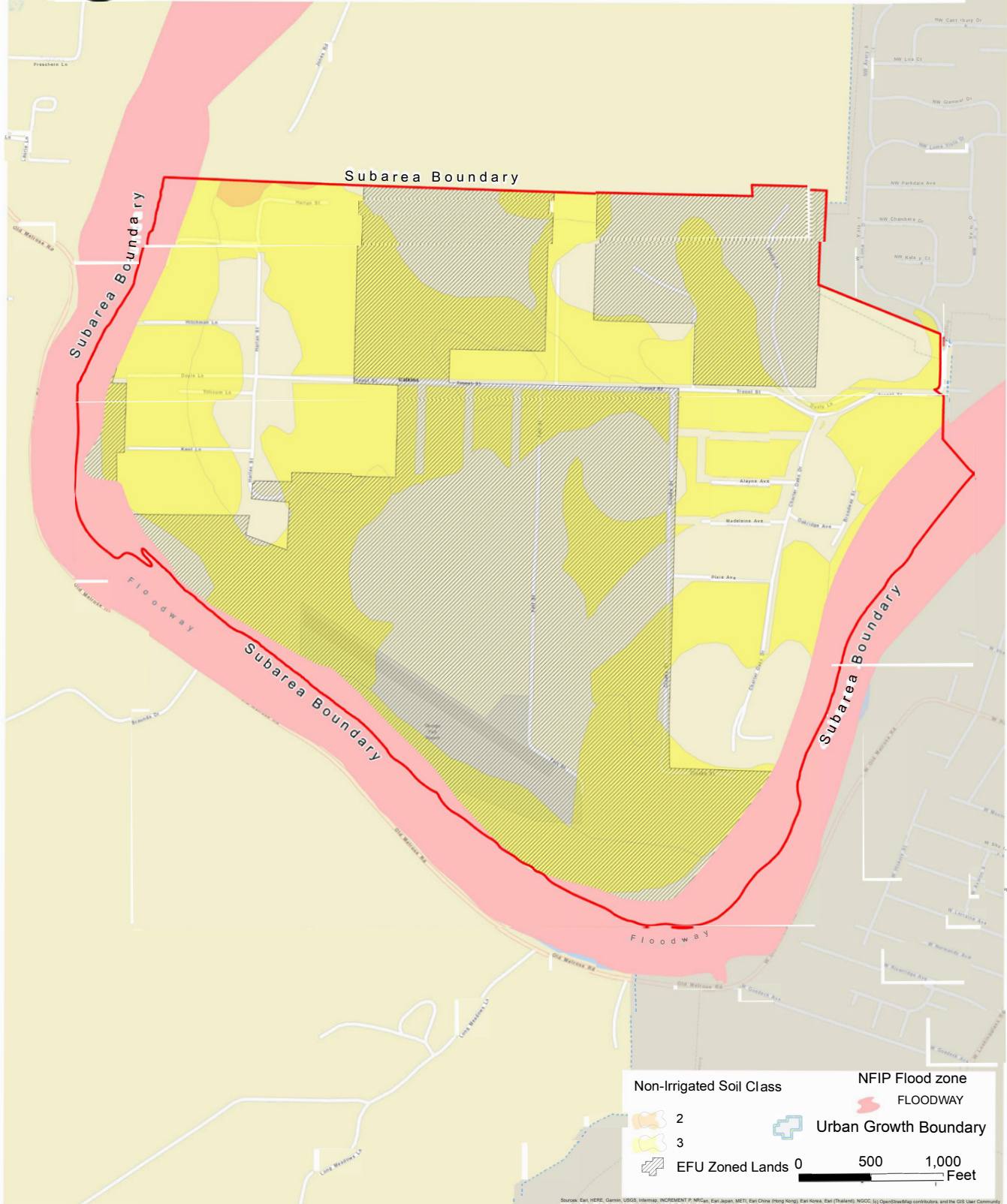
While the Charter Oaks subarea was selected based on it being the most qualified subarea for the exchange relative to the other subareas within the study area analysis, a number of conditions exist in this subarea that create conflicts with applicable goals and objectives of the City and State. For instance, as can be seen on Exhibit 67, the Charter Oaks area contains a relatively large amount of NRCS non-irrigated class III soils and land that is zoned as exclusive farm use (EFU) by Douglas County. As noted previously in this report, the Charter Oaks subarea also contains a relatively large amount of High-Value Farmland, which is best shown in Exhibit 27. In concurrence with the County’s Comprehensive Plan and state law, it’s the City’s objective to minimize, where practical, the amount of these lands and other high-value farmlands from inclusion, as they may contain valuable Goal 3 lands.

The following 6 sections refine the Charter Oaks Subarea down to the final Exchange Area proposed with this exchange.



**City of Roseburg
Urban Growth
Boundary Exchange**

**Charter Oaks: Refinement
(Soils/County Zoning/Floodway)**



A number of these lands within the Charter Oaks area, regardless of soil class and EFU zoning, have been either classified as exception lands by virtue of the existing rural residential zoning and current land use or by way of pre-existing parcelization are committed to non-agricultural uses. For example, as shown below in Exhibit 68, along the south side of Troost Street a couple of 1955 subdivision plats have parcelized two large areas of vacant land. The Fairlea subdivision plat to the west is actually zoned EFU, but similarly to the Park Haven subdivision plat along Charter Oaks Drive is subdivided into roughly quarter acre lots.

Exhibit 68, Aerial Picture of Platted Subdivisions in the Charter Oaks Area



NW Troost St

As a result, the City has considered the historic development pattern within the Charter Oaks subarea, starting at the east side, which contains a large amount of rural residential lots along Charter Oaks Drive and the South Umpqua River. The development pattern then extends west along Troost Street toward Harlan Street. Troost has some existing rural residential development along the north side and the two vacant platted subdivisions shown within Exhibit 68. The western end of the subarea along Harlan Street also contains a large area of existing rural residential development. These areas consist of the priority land for inclusion, as identified by OAR 660-024-0067. However, in order to establish a logical boundary, the final area will also contain some land of lesser priority, as acceptable under the provisions of subsection 3 of the aforementioned OAR. Pursuant to this OAR, these areas of lesser priority considered for inclusion do not consist of predominantly high value farmland and are not predominantly made up of prime or unique farm soils. Additionally, and as noted previously, the areas within the eastern portion of the subarea and the lands along Troost Street extending west toward Harlan Street eventually connect to another area of priority land for inclusion. The current proposal will not include these westerly most lands, because the proposal has a limit capacity for lands to be included through the exchange process. However, this area is a logical future location for inclusion of lands into the UGB if future demands warranted another UGB amendment.

I. REMOVAL OF NON-PRIORITY/CONSTRAINED LANDS

To the greatest extent possible, the final boundaries of the Exchange Area were modified in order to remove lands that are non-priority lands or lands that contain physical conditions making them inefficient for future urbanization. Generally, this includes the larger parcels along the southern end of the subarea that are both EFU zoned and are wholly or partially mapped within the floodplain. These larger parcels includes a portion of the high-value farmland as identified and discussed in the priority for land inclusion section of this report.

Removing identified high-value farmland was an important consideration for the City when refining the subarea down to the final proposed Exchange Area. Through careful consideration, the City engaged in the refinement of the subarea with this in mind and removed much of the resource land that meets the statewide definition of high-value farmland from the proposed Final Exchange area. This is demonstrated in Exhibit 69 on page 121. As shown in this exhibit, the amount of high value farmland was reduced from the total amount in the subarea to nearly half of that in the proposed Exchange Area. While this does not remove all of the high-value farmland, it does leave a large portion of the area outside of the proposed Exchange Area.

The lands removed also include some areas both north and south of Troost Street that have been identified containing significant areas of wetlands, which have been preliminarily delineated via two separate studies. A site-specific wetlands determination report was provided to the City by a private landowner. The purpose of the report was to aid in the determination of an appropriate boundary line for the exchange area. The whole report can be found in **Appendix 3**. Mapping provided by Schott & Associates, Ecologist and Wetland Specialists indicate that 23.35 acres of freshwater emergent wetlands could be found within two properties on the west side of the study area past Felt St (T27S, R6W, Section 15BC, Tax Lot 200, Section 15CB Tax Lots 600-3600, Section 15 Tax Lots 801 and 102). The City determined that removing the parcel to the north and the majority of the parcel to the south would reduce the amount of environmental impact and lower the likelihood of inefficiencies of future urbanization.

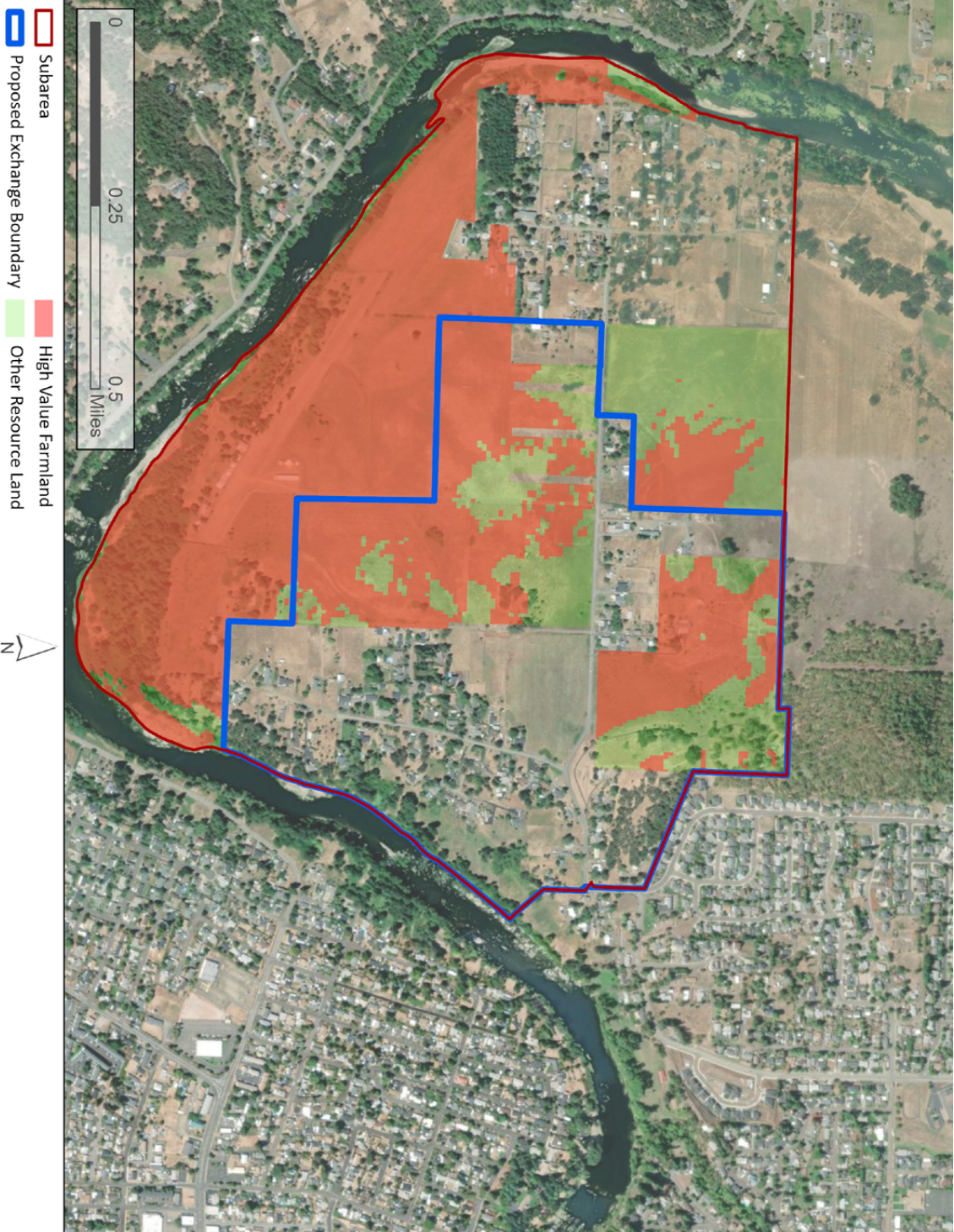
All lands removed for these reasons are shown in Exhibits 69 and 70 and consist of approximately 174 acres removed from the previous total of 480 acres, resulting in 306 acres. By removing these lands from the exchange area, farming practices are likely to continue in the historical manner as described in the Goal 14 Evaluation for Compatibility (page 105-106).



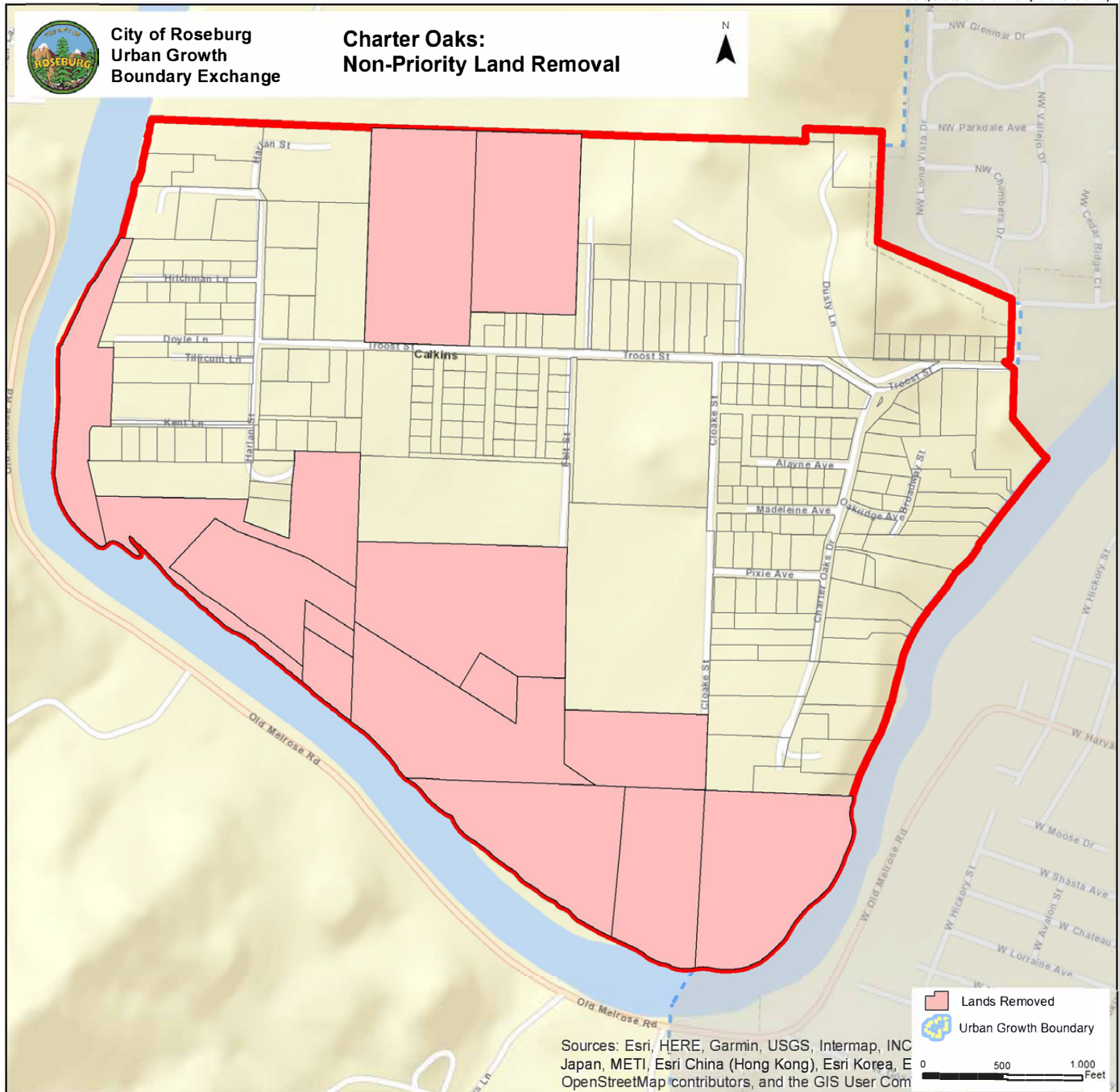
**City of Roseburg
Urban Growth
Boundary Exchange**

**Removal of High Value Farmland
from Exchange Area**

Exhibit 69, Removal of High-Value Farmland



Charter Oaks: Non-Priority Land Removal



2. DENSITY CALCULATION FOR FINAL EXCHANGE AREA

With the Charter Oaks subarea selected for the exchange and further refined to remove portions of the subarea that are non-priority or developmentally constrained, the City must now calculate the approximate amount of density that is to be exchanged with the lands proposed for removal from the UGB. This amount of density to be exchanged will serve as the final amount proposed for the Exchange Area in the Charter Oaks subarea. As a result of this calculation the Charter Oaks subarea will be refined for a second time to include only the amount of land able to be included based on density.

The following density calculations approximate future land development capacity for the purposes of supporting long range planning efforts related to UGB and public infrastructure planning. The approximations are based upon the following considerations:

- Existing and future land use designations
- Existing development constraints
- Lands in Public Ownership or zoned for Public Use
- Development constraints (generally consists of reducing development capacity by 20% to account for public infrastructure improvements)

It's important to note that some of the areas included in the analysis may not currently have a land use designation within the city or may contain a designation that allows for development other than residential. Therefore, actual density of development may differ.

For the purposes of this analysis, the assumption will be that all land is utilized at a standard residential development capacity of the respective zone (Example: R6 zoning will result in a development capacity of one dwelling per 6,000 sq. ft. or MR14 zoning will result in a development capacity of 14 dwelling units per gross acre). In the case of existing development, the assumption will be made that parcels with existing development on at least 0.75 acres or more are re-developable and a quarter acre will remain with the existing dwelling.

The following density calculations consists of the two areas to be removed from the UGB, and the Charter Oaks subarea to be included into the UGB, and will be reviewed in the follow order:

1. Area #1 to be excluded from UGB (Atkinson/NW Daysha Dr.)
2. Area #2 to be excluded from UGB (Serafin/Barager Rd.)
3. Final Subarea – Charter Oaks

The acreage of the subareas above will be used to find the density and final acreage to be exchanged to the proposed Exchange Area. These acreages will determine final development capacity of the Charter Oaks Exchange Area. However, prior to using these acreages for calculation of development capacity, constrained areas in the Exchange Area need to be subtracted from development capacity. Floodplains will be removed from the density calculations from the Exchange Area (lands within the floodway are not considered developable and are removed entirely).

The final density calculation for the Exchange Area is determined based on the standard residential density of the zone (Example: The density for R7.5 is assumed to be one dwelling unit per 7,500 square feet). An

additional 20% of development capacity is removed from the overall density calculations in order to account for development infrastructure and other limitations that may not be evident until time of development.

To complete the density calculations, the City wanted to use the most accurate density to apply to the lands being removed from the UGB, as the lands proposed to be removed are highly sloped and the existing zoning and the density allowed on the properties does not necessarily match real-world conditions.

To do this, the City performed a Residential Lots with Slope Coverage analysis on how much development has occurred in the entire City on sloped areas to determine the best assumption of what residential density can be used for the final density calculations in this swap. The analysis looked both at typical lot sizes and typical densities in areas with slopes between 12% and 25% and those with slopes over 25% to support their assumptions. There are two classes for slopes. Class one looks at lots with medium slopes above 12%. The second class considers steep slopes to be 25% and higher. A lot is to be affected by slopes if a specific percentage of the lot is found to be sloped. The analysis is using DOGAMI's slope coverage. It is via a ground surface LiDAR based on a 3x3 foot cell size. To be consistent within the analysis any residential lot is assigned a slope percentage. This can include lots within the "flatter" areas of the city.

The slopes are further categorized into percent cover of the individual lot. Below is a priority/hierarchical list of the categories:

1. 75% of lot is covered by steep slopes
2. 50% of lot is covered by steep slopes
3. 75% of lot is covered by medium slopes
4. 50% of lot is covered by medium slopes
5. 25% of lot is covered by steep slopes
6. 25% of lot is covered by medium slopes – not considered for this analysis

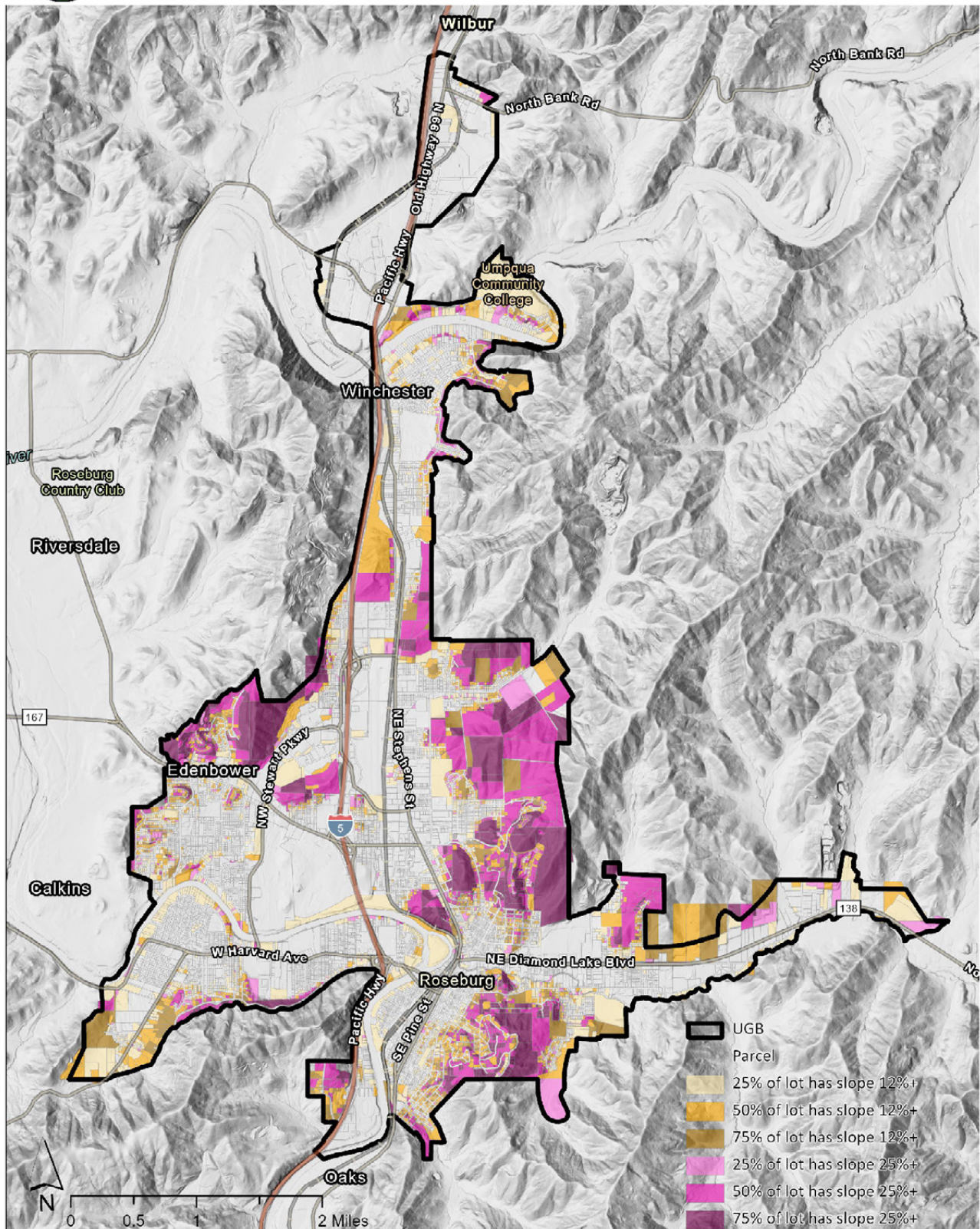
A lot is determined to be residential by the County property code. A lot is assumed to be residential, if the property code identifies the lot to be non-vacant improved with a residential, rural, or multi-family use.

The following Exhibits 71 and 72 demonstrate the slope coverage in the entire city, and the slope coverage on residential lots only.



City of Roseburg
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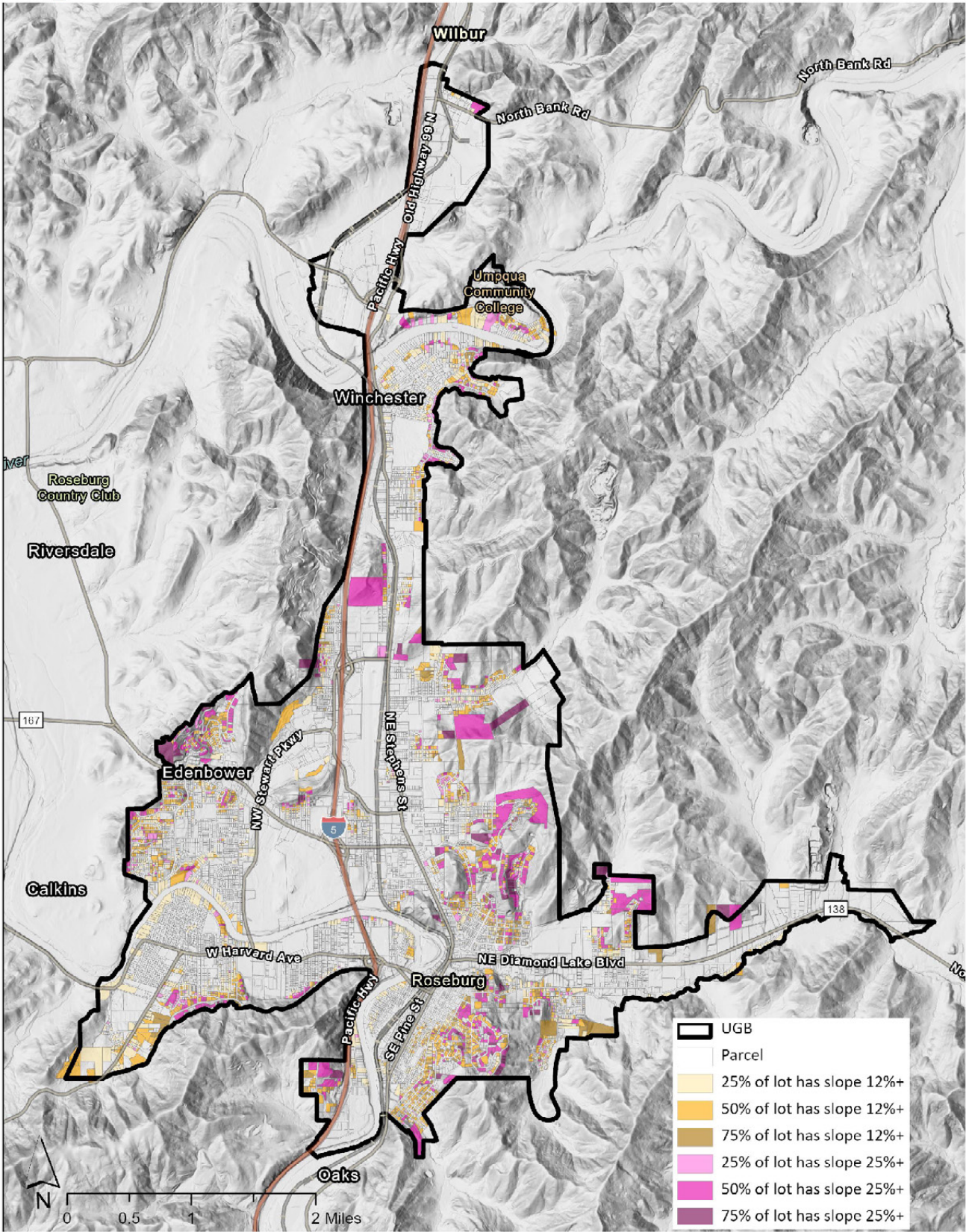
All Parcels with Categorized Slope Coverage





City of Roseburg
Urban Growth
Boundary Exchange

Residential Lots with Slope Coverage



Following the finding of residential lots with slope coverage as depicted in Exhibit 72, the City determined the actual size of the lots with residential structures on them. The table below lists the minimum, maximum and average residential lot size within the 5 slope categories as determined by the Residential Lots with Slope Coverage analysis.

Table 21, Number and Size of Lots in the City of Roseburg with Slope

Slope affected	Number of Lots	Total Acreage	Minimum Lot Size (sqft)	Maximum Lot Size (sqft)	Average Lot Size (sqft)	Median Lot Size (sqft)
75% of lot has slope 25%+	92	128	853	623,142	60,619	20,237
50% of lot has slope 25%+	585	523	1,414	1,868,205	38,962	15,602
75% of lot has slope 12%+	342	194	606	602,693	24,670	10,115
50% of lot has slope 12%+	1,360	502	700	572,970	16,071	10,009
25% of lot has slope 25%+	323	115	871	281,426	15,460	10,495

This analysis on the number and size of lots in the city was used to determine the most accurate lot size assumption for the final density calculation. This lot size assumption will be used to determine the density (in dwelling units per acre) for the steep sloped lands that are being removed from the UGB.

The average median lot size of the 5 categories is 13,292 square feet. The City finds that a median lot size of 15,000 square feet is an appropriate assumption for lands with 25%-75% of the lot being affected by slopes of 12% or greater. This 15,000 square foot lot size is the assumption used for the final density calculations in Exhibit 73.

As shown in Exhibit 73, the amount of acres in the lands being removed is divided by 15,000 square feet to determine a dwelling unit capacity based on real world conditions. As demonstrated in the exhibit with the assumptions provided by the Slope Coverage Analysis above, the number of dwelling unit capacity to be removed from the Atkinson site is 212 dwelling units, the total dwelling unit capacity for the Serafin site is 434 dwelling units, for a combined total capacity of 646 dwelling units to be removed from the UGB.

The total capacity of dwelling units to be added in the Exchange Area is 673 dwelling units.



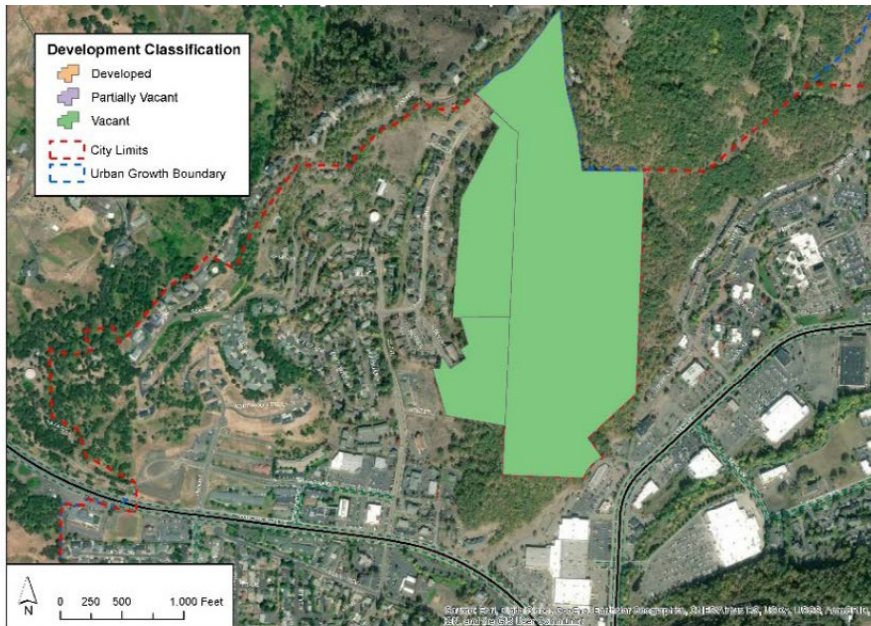
**City of Roseburg
Urban Growth
Boundary Exchange**

Final Density Calculations

Exhibit 73, Final Density Calculations



Withdrawn Area #1 – (Atkinson Site / NW Daysha Dr.):



Total Acres = 91.5 Acres

Developed = 0 Acres

Partially Vacant = 0 Acres

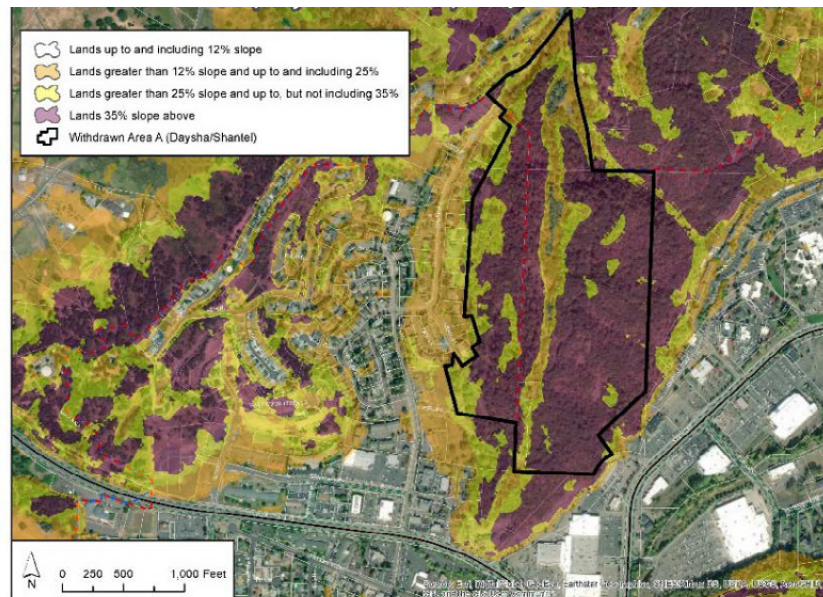
Vacant = 91.5 Acres

**Total Acres with development
capacity = 91.5 Acres**

Slopes less than 12% = 0 Acres
(MR29); 0 Acres (MR40); 1.6
Acres (RS)

Slopes between 12% and 25% =
.45 Acres (MR29); 0.2 (MR40);
9.1 Acres (RS)

Slopes Greater than 25% = 13.7
Acres (MR29); 8.7 Acres (MR40);
57.8 Acres (RS)

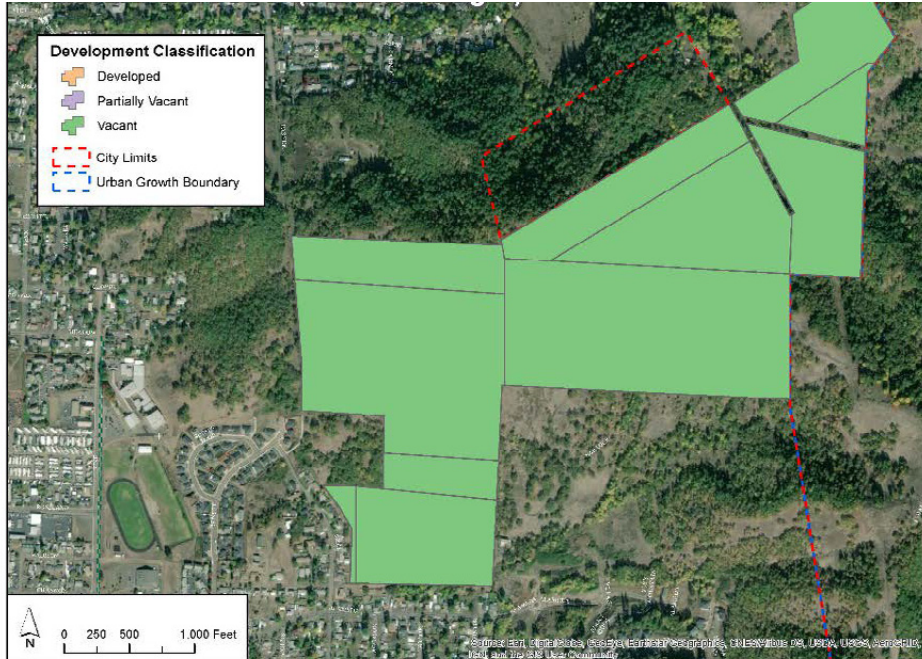


91.5 Acres / 15,000 sq feet = 265 D.U.

D.U. x 0.80 = **212 Total Dwelling Units**

****Assuming capacity for development on slopes
= (1 DU /15,000 sq. ft.)****

Withdrawn Area #2 (Serafin Site / Barager Rd.):



Total Acres = 193 Acres

Developed = 0 Acres

Partially Vacant = 0

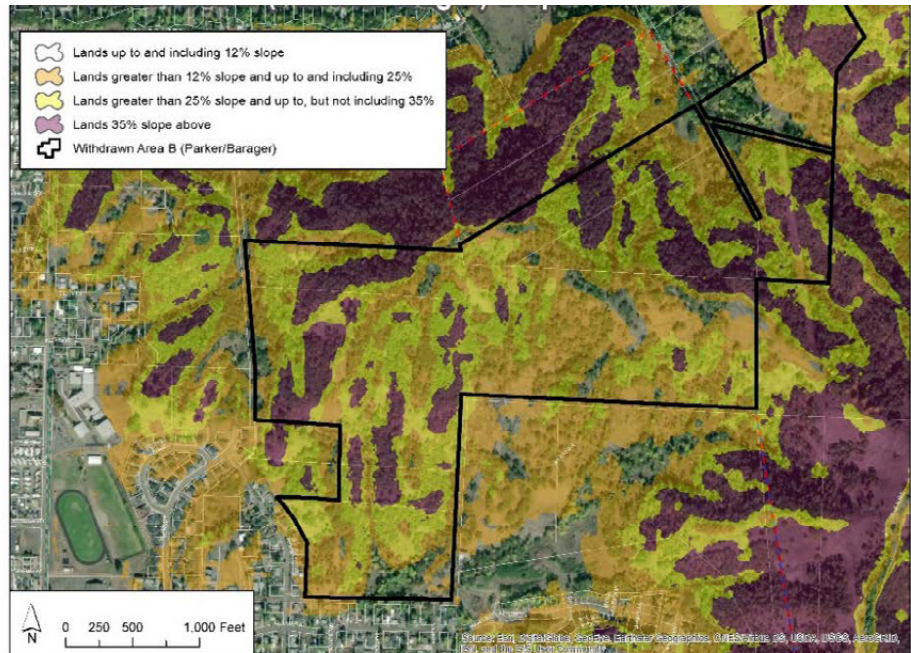
Acres Vacant = 193 Acres

Total Acres with
development capacity = 193
Acres

Slopes less than 12% = 14
Acres

Slopes between 12% and
25% = 64.5 Acres

Slopes Greater than 25% =
114.5 Acres

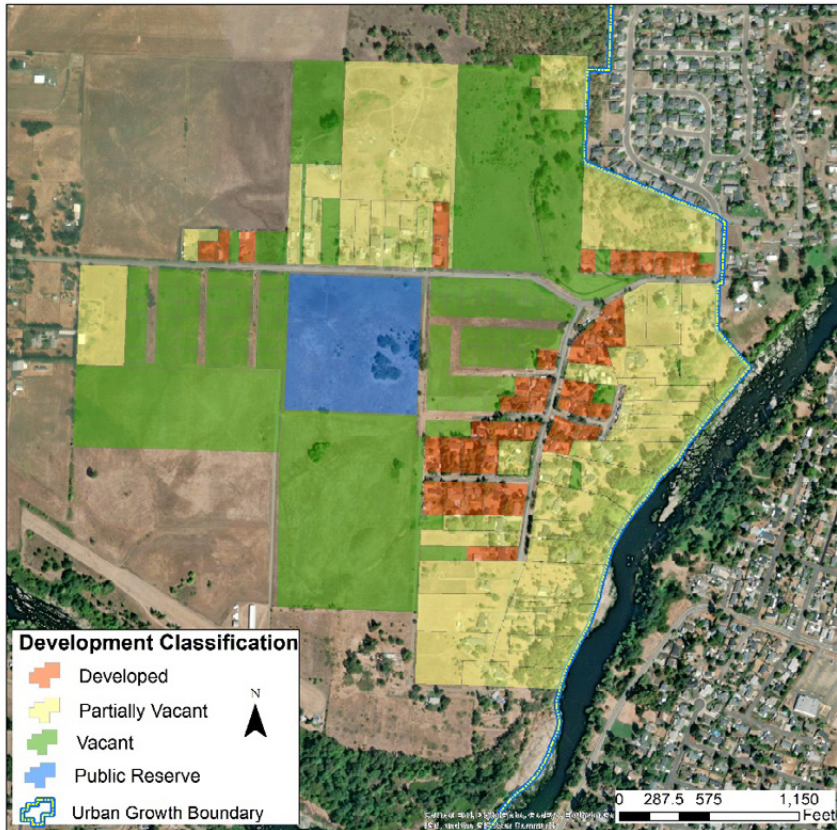


193 Acres / 15,000 sq feet = 560 D.U.

D.U. x 0.80 = **448 Total Dwelling Units**

****Assuming capacity for development on slopes
= (1 DU /15,000 sq. ft.)****

Final Subarea (Charter Oaks):



Total Acres = 229 Acres

Developed = 18.5 Acres

Partially Vacant = 91.3 Acres

Vacant = 101.7 Acres

Public Reserve = 17.5 Acres

Subtract 17.5 acres of land in public ownership to remain in PR zoning, subtract 18.5 acres of developed land and subtract a discounted amount of 0.25 acres for each partially vacant lot (40 lots x 0.25) for 10 acres total for partial development capacity.

$229 - (17.5 \text{ acres} + 18.5 \text{ acres} + 10 \text{ acres}) = 183$

Total Acres with development capacity = 183

Total Acres with development capacity = 183

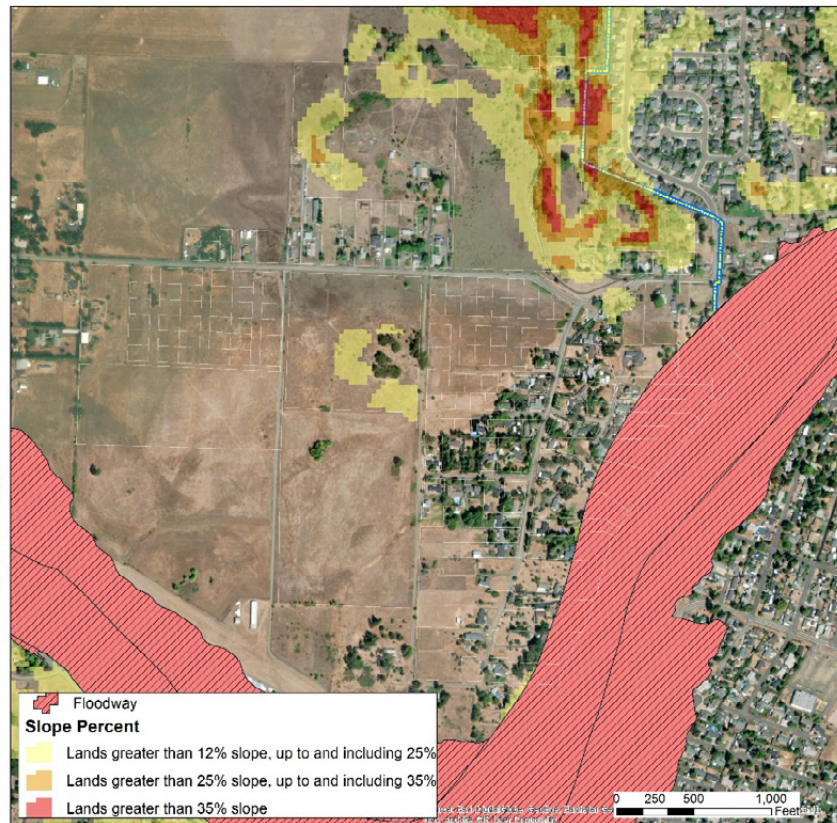
Acres

Slopes less than 12% = 129.5 Acres

Slopes between 12% and 25% = 22.8 Acres

Slopes Greater than 25% = 8.2 Acres

Floodway = 17.2 Acres (removed)



$129.5 \text{ Acres} / 7,500 \text{ sq. ft.} = 752 \text{ D.U.}$

$31 \text{ Acres (sloped)} / 15,000 \text{ sq. ft.} = 90 \text{ D.U.}$

$842 \text{ D.U.} \times 0.80 = \mathbf{673 \text{ Total Dwelling Units}}$

****Assuming Zoning of R7.5 and same capacity for development on slopes (1 DU /15,000 sq. ft.)****

3. COMPARING THE EXCHANGE OF RESOURCE LAND

The main focus of the density analysis is to ensure that the amount of land entering into the UGB has a roughly proportional development capacity as the land exiting the UGB. While not an explicit requirement of statute, the City will also compare the amount of resource land entering the UGB versus exiting the UGB.

The Charter Oaks subarea contains approximately 113 acres of resource land, zoned Exclusive Farm Use-Grazing (FG) by Douglas County. The purpose and intent of the FG zone is to provide areas for the practice of agriculture and permit new uses which are compatible with agricultural activities, including a single-family dwelling under specific provisions. The area exiting the UGB, specifically a section of the Serafin site, is proposed to have approximately 79 acres as resource land, zoned Farm Forest (FF). The purpose and intent of the FF zone is to promote the use of such areas for agricultural and forest resource uses, protecting it from non-resource use and conflicts. Lands in this zone may be used for farm or forest uses, with limited opportunities for home occupation in conjunction with farm use.

The 79 acres of land going into the County jurisdiction as resource land shall offset the loss of resource land going in by approximately 70%. Exhibits 74 and 75 show a comparison of the non-irrigated soil capability class of both sections of land. There was no data available for forest productivity (cubic feet per acre per year) for either site, and there was no irrigated capability class data available for the Serafin site.

Exhibit 74. Non-Irrigated Soil Class & Soil Types for the Serafin Site proposed FF land.

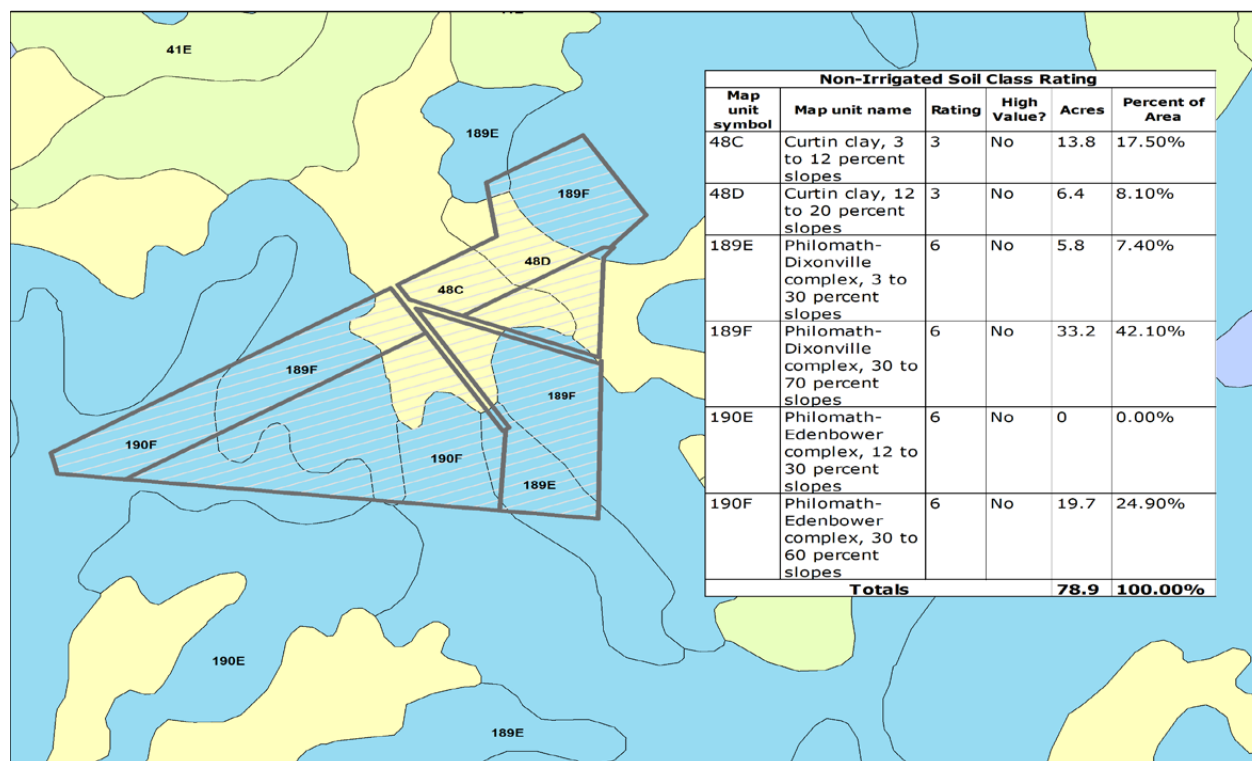
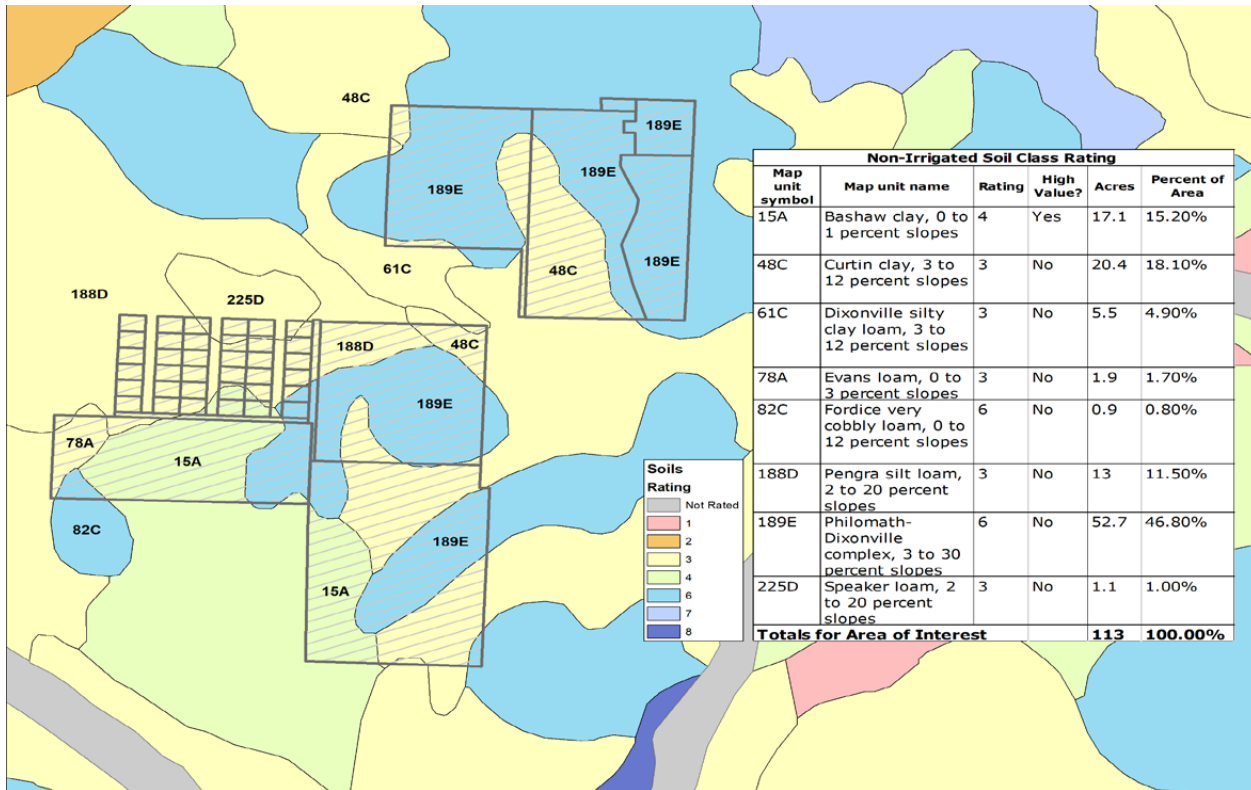


Exhibit 75. Non-Irrigated Capability Class for the EFU land in the proposed Exchange Area



4. COMPARING THE EXCHANGE OF LANDS BASED ON TYPE

UGB lands exchange procedures have provisions at OAR 660-024-0070(3) which state as follows:

(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).

Table 22 provides a comparison of the “type” of lands involved in this exchange and offers justification for the following:

Table 22, Comparison of Type of Lands involved in UGB Exchange

Comprehensive Plan Designation	Acres Removed	Acres Added
Low-Density Residential (LDR)	258.5	211.5
High-Density Residential (HDR)	8.9	0
Public-Semi Public (PSP)	0	17.5

At first glance, it may appear that there is an unequal exchange of land types, in that there are high density residential lands being removed from the UGB’s land supply with only low-density and public-semi public lands (for the School District property) coming in. However, the first point of clarification is that nearly all

of the high density designated land is not considered as available to meet a residential need at that level of density, based on calculations within the adopted 2019 HNA. This analysis is further supported by the work that the City completed to understand exactly what density of development is occurring on sloped areas in and around the city, which is discussed above in this report in subsection 2.F.2. Table 21 demonstrates that the median lot size across the city of lots that have slopes of 25% or greater that cover 50% of the lot or more is 17,919 square feet. As discussed in the findings in the Density Calculation for Final Exchange Area section of this report, the City is using the 15,000 square foot per lot amount to determine what the appropriate density “exchange rate” is for the lands removed. This finding demonstrates that in areas that are currently zoned for high-density to be removed from the UGB, the actual development on the residential lands in the city that have steep slopes similar to the lands to be removed do not support the same level of density of development that the zoning allows. With that finding, and with the additional justifications below, the City finds that the higher density lands being removed from the UGB will not have an impact on the high-density development capacity of the city.

The HNA, conducted by ECONorthwest, includes a Buildable Lands Inventory (BLI) and Capacity Needs Analysis which show that the lands included in this exchange do not have a significant effect on the current supply. Consistent with Oregon Administrative rule guidance on residential buildable lands inventories, ECONorthwest deducted certain lands with development constraints from the BLI. Exhibit 76 shows that out of 372 High Density Residential Acres, 107 acres were constrained. One of several development constraints was steep slopes greater than 25% (OAR 660-008-005(2)). Steep slopes were treated as prohibitive constraints and those areas were deducted from available lands identified as vacant or partially vacant. The map of these constraints in Exhibit 77 and 78 clearly shows that nearly all of the Atkinson property to be removed was deducted from the buildable supply in the adopted BLI.

Exhibit 76, Development status with constraints, by plan designation, Roseburg UGB, 2018

Plan Designation	Total acres	Committed acres	Constrained acres	Buildable acres
Low Density Residential	3,461	1,197	1,378	885
Medium Density Residential	856	503	197	155
High Density Residential	372	201	107	64
Residential Open Space	119	7	54	58
Commercial	757	577	110	70
Industrial	433	234	74	125
Total	5,998	2,720	1,921	1,358

Source: Douglas County, ECONorthwest analysis

Note: Industrial land only includes areas that allow a mixture of industrial and residential uses.

Roseburg Buildable Lands Inventory

Residential Constraints

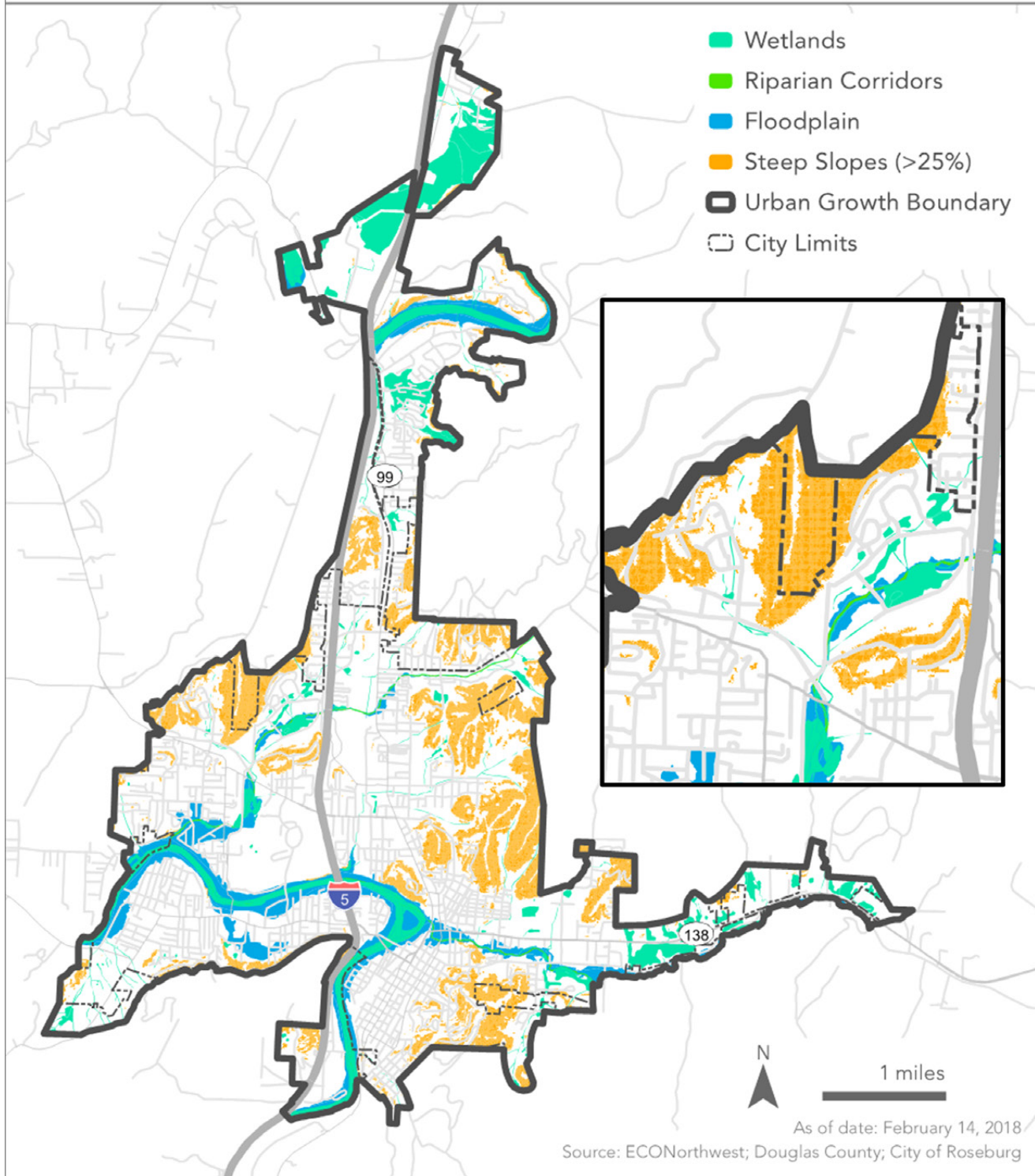
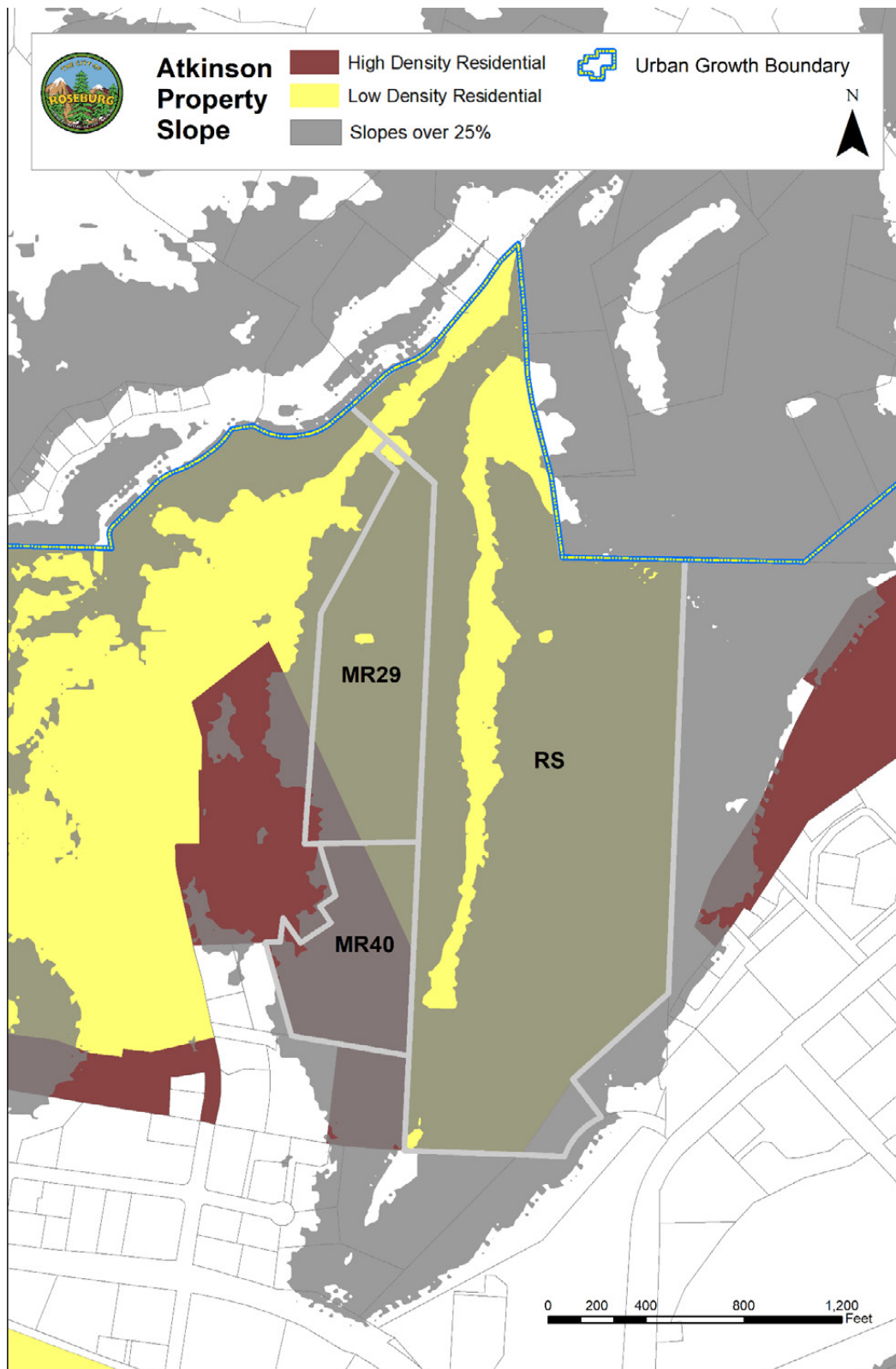


Exhibit 78, Atkinson Property Slope with Relation to High and Low Density Residential



There are 8.9 acres of High Density Residential land within the area proposed to be removed from the UGB which is located in the Atkinson property. As seen on the slope map in Exhibit 78, there are only a few small patches of land under 25% slope within the area designated as High Density Residential. Add these small areas together and they represent approximately 0.45 acres of buildable High Density Residential land using the State definition of “buildable”. If you further include the buildable Low Density Residential land that has urban MR29 (Multiple-Family Residential) zoning, which is erroneously zoned as a density classification above its Comprehensive Plan designation, it is around 0.65 acres. These areas are all still moderately sloped between 12.01%-24.99% grade. The City finds 0.45 acres of HDR land to be a negligible amount as it is a handful of non-contiguous pockets on the edge of the property line and makes up only 5% of the total High Density Residential land area included in this swap.

The HNA shows that there is a 3 acre surplus of high density residential land, however if you factor in the need for Group Quarters in HDR land, there is a 24 acre deficit. Based on the above calculation, there would be a 0.45 increase in the deficit, making the total deficit 24.45 acres (see Exhibit 79).

Exhibit 79, Final comparison of capacity of existing residential land with demand for new dwelling units and land surplus or deficit, Roseburg UGB, 2019 to 2039

Plan Designation	Capacity (Dwelling Units)	Demand (Dwelling Units)	Remaining Capacity (Dwelling Units)	Land Surplus or (Deficit) Gross Acres
Low Density Residential	2,567	1,547	1,020	352
Medium Density Residential	604	561	43	11
High Density Residential	578	550	28	3
Group Quarters in High Density Residential				(24)

Source: City of Roseburg: Housing Needs Analysis. prepared by ECONorthwest.

Since adopting the HNA in 2019, the City has worked on a number of initiatives which have encouraged an increase in higher density residential unit supply within the UGB. The City finds that these initiatives will further offset the identified deficit of high density residential lands. These initiatives include: a Middle Housing (HB2001) Code Update Project funded by a grant awarded from DLCD, and a Multifamily Housing systems development charge (SDC) deferral program funded through the Diamond Lake Urban Renewal District. Through these initiatives, the City adopted provisions that increased potential development density in existing low density residential areas and also incentivized multifamily housing development within Mixed Use zones, inside the Diamond Lake Corridor.

HB 2001 Code Changes

Within the HNA under the section, “Summary of the Factors Affecting Roseburg’s Housing Needs” and the subtitle, “Without substantial changes in housing policy, on average, future housing will look a lot like past housing.” (Pg. 65 - 1st bullet point) states the following, “The City’s residential policies can impact the amount of change in Roseburg’s housing market, to some degree. If the City adopts policies to increase opportunities to build smaller-scale single-family and multi-family housing types, a larger percentage of new housing developed over the next 20 years in Roseburg may begin to address the City’s needs. Examples of policies that the City could adopt to achieve this outcome include: allowing a wider range of housing types (e.g., duplex or townhouses) in single-family zones, limiting single-family detached housing in multifamily zones, ensuring that

there is sufficient land zoned to allow single-family attached multifamily housing development, supporting development of government-subsidized affordable housing, and encouraging multifamily residential development downtown.”

Shortly after the adoption of the HNA, the Oregon Legislature passed House Bill 2001 to help provide citizens with more housing choices, beyond that of a typical detached single-family residence. Under the bill, by June 30, 2021, cities with a population of more than 10,000 were required to allow duplexes in areas zoned for single-family dwellings. By June 30, 2022, cities with a population of more than 25,000 were required to allow duplexes, triplexes, fourplexes, cottage clusters, and townhouses in residential areas.

During that time, Roseburg was in a unique situation, in that the most current population data indicated Roseburg was just a couple hundred people short of the 25,000 mark to require triplexes, fourplexes, cottage clusters and townhouses. Recognizing these future changes, the City applied for a grant through DLCD in April of 2020. The grant was designed to assist in amending our code to better enable the use of duplexes in residential areas and to help prepare future amendments to allow triplexes, fourplexes, cottage clusters and townhouses, recognizing that by June 30, 2022, the City’s population could exceed 25,000. The City was awarded the grant in June of 2020, and the City drafted amendments designed to address the “medium city” requirements of HB2001 including changes to duplex criteria within single-family dwelling requirements. These were adopted June 28, 2021, and the City now allows a wider variety of housing types to be developed.

Shortly after the adoption of the medium city requirements through HB2001, the City received updated population data for the City of Roseburg from the PSU Population Research Center indicating that the population of Roseburg was actually more than a 1,000 people short of the 25,000 mark rather than just 200 people short.

The City recognized that although it was further away from the 25,000 population necessary to qualify as a large city, it still wanted to move forward with updating the code concerning the draft amendments that had been prepared for triplexes, fourplexes, cottage clusters and townhouses. However, prior to adopting the code changes, the City wanted to wait and see how these would be implemented by larger cities as the deadline of June 30, 2022, approached. Unfortunately, around this time is when the Community Development Department began having serious staff turnover, and rather than implementing these new changes the decision was made to prioritize the UGB swap based on staff capacity. The plan within the department is that upon completion of the UGB swap, it will implement the draft policy after evaluating other large cities changes as part of HB2001.

Regardless of these changes, market demands have pushed new townhome and duplex style development within the city over the last few years and the existing land use ordinance has been able to provide avenues for this development. In the last 5 years, the City has seen a considerable increase in medium and high density development within the City.

In 2019, a 14-unit townhome subdivision (Thyme Subdivision) was granted preliminary approval on the west side of town. Infrastructure improvements within this development are now being finalized and this development just submitted for final plat review. In addition, in this same neighborhood, a 36-unit townhome subdivision received preliminary approval in October of 2021. Finally, the City Planning Commission recently granted approval of 10 lot duplex subdivision at the beginning of April 2023 for an infill property within the Hucrest neighborhood.

Although the City has yet to update the entirety of its draft code prepared for HB2001 concerning triplexes, fourplexes, cottage clusters and townhomes, it is encouraging to see market demand for townhomes and

duplexes within the City growing and development trends moving that direction.

System Development Charge (SDC) Buydown Program

The SDC Buydown Program has since attracted the attention of a number of developers. Since 2019, 406 new units of multifamily housing have been constructed or are planned to be completed within the next year. These new units have a great effect on the current land need that is not captured in the adopted version of the HNA.

Over the last four years, the City has approved these 406 new units of apartments along the Diamond Lake corridor adjacent to NE Diamond Lake Blvd./Hwy 138. Currently about half of these structures have been completed and the other half are under construction.

They consist of four major apartment complexes:

Deer Creek Village – NeighborWorks Umpqua (low-income)

68-units

Medium-Density Multi-Family Residential Zoning

2.68 Acre Parcel

Oak Springs Apartments – Timberview Construction (market rate)

89-units

Mixed Use Zoning

5.01 Acre Parcel

Ash Springs Apartments – Timberview Construction (market rate)

105-units

Mixed Use Zoning

7.00 Acre Parcel

Sunshine Park Apartments – Wishcamper Development Partners (low-income)

144-units

Mixed Use Zoning

9.08 Acre Parcel

Three of these four apartment complexes were constructed in a mixed use zone. The major appeal for development within this area is the Urban Renewal District that was formed along the Diamond Lake corridor in July of 2018. The Urban Renewal District enabled the formation of a SDC deferral program. This is a massive

incentive for a developer looking to construct a large apartment complex. The SDC deferral program offers up to \$5,000 per unit in SDC payments being deferred for payment by the Urban Renewal Agency at a later date.

With assistance from the City, developers evaluated mixed use zoned property within this area to determine suitable locations for their respective apartment complexes in order to take advantage of the SDC deferral program. One comment from a developer indicated that the need for apartments are so great throughout the state, that he could have easily built his apartment complex in nearby cities like Cottage Grove or Grants Pass and they would have filled up just as quickly as they did here, but because of the SDC incentive program and the relative ease of obtaining approval for development in the mixed use zone they chose to construct them in Roseburg.

Considering that it had been years since Roseburg had seen the construction of apartment complexes to this scale, the influx of 400 new units in such a short time will have a big impact to the area. Not only does it provide market rate and low income housing options, but it also serves as the impetus for further commercial development and continued residential development within the corridor. At this point in time, approximately \$750,000 worth of funding still exists for additional SDC deferral opportunities within the district. Requirements to qualify for this funding are fairly straightforward: construct multi-family housing. Although medium and high density residential zoning is limited within the district, mixed use zoning is in abundance. Other development constraints such as wetlands and topography play a contributing factor to future development potential, but these would be issues a developer would need to address regardless of the zoning.

Even with these additional units, the City intends to pursue more acts of policy intervention in order to increase land availability as discussed. The HNA recommends policy actions such as upzoning lower density residential lands to a higher density in the Housing Policy & Action Memorandum. Table 23 is a segment of the Implementation Actions table from the report:

Table 23, Proposed Implementation Schedule

Implementation Actions	Implementation Schedule				
	On-going	Within 1 year	Within 2 years	2 to 5 years	5 + years
Policy 1. Land Availability					
1.1a. Evaluate swapping constrained residential land within UGB for unconstrained buildable residential land outside UGB	<input type="checkbox"/>	<input type="checkbox"/>			
1.1b. Identify Low Density Residential land that could be redesignated to Medium Density Residential				<input type="checkbox"/>	
1.1c. Identify Low Density Residential and Medium Density Residential land that could be redesignated to High Density Residential				<input type="checkbox"/>	

Based on the recommended Implementation Schedule, the City plans to pursue actions 1.1b and 1.1c following the completion of the UGB swap.

With current market trends and the supply of funds still within the SDC Deferral program, and the forthcoming adoption of code changes that implement the intent of HB2001, the City expects further density within the current city limits to outpace the deficit described in the adopted HNA. As demonstrated in this section, over 23

acres of regulated affordable and market rate multi-family housing has been developed since the adoption of the HNA adding a total of 406 multi-family units to the City. These actions demonstrate that the City is using alternative methods, such as the described SDC Deferral Program, to meet their housing needs, which offset the deficit as described in the HNA, and the removal of 0.45 acres of HDR zoned lands.

With the additional multifamily housing being built in other parts of the of city currently, the City finds that there will be no net impact as a result of removing 0.45 acres of buildable High Density Residential land from the UGB.

5. FINAL COMPARISON OF DWELLING UNIT CAPACITY

After removing density from each of the three areas based on slope and floodplain constraints and adjusting the development capacity of each area's density based on existing development, the three areas result in the available densities shown below in Table 24.

Table 24, Total Potential Dwelling Units Exchanged in UGB Swap

<u>Density Exchange</u>	# of D.U.'s
Atkinson Site	212
Serafin Site	448
Total D.U.'s Removed	660
Charter Oaks Exchange Area	673
Total D.U.'s Added	673
Net Dwelling Units	+13
<i>**D.U.'s = Dwelling Units</i>	

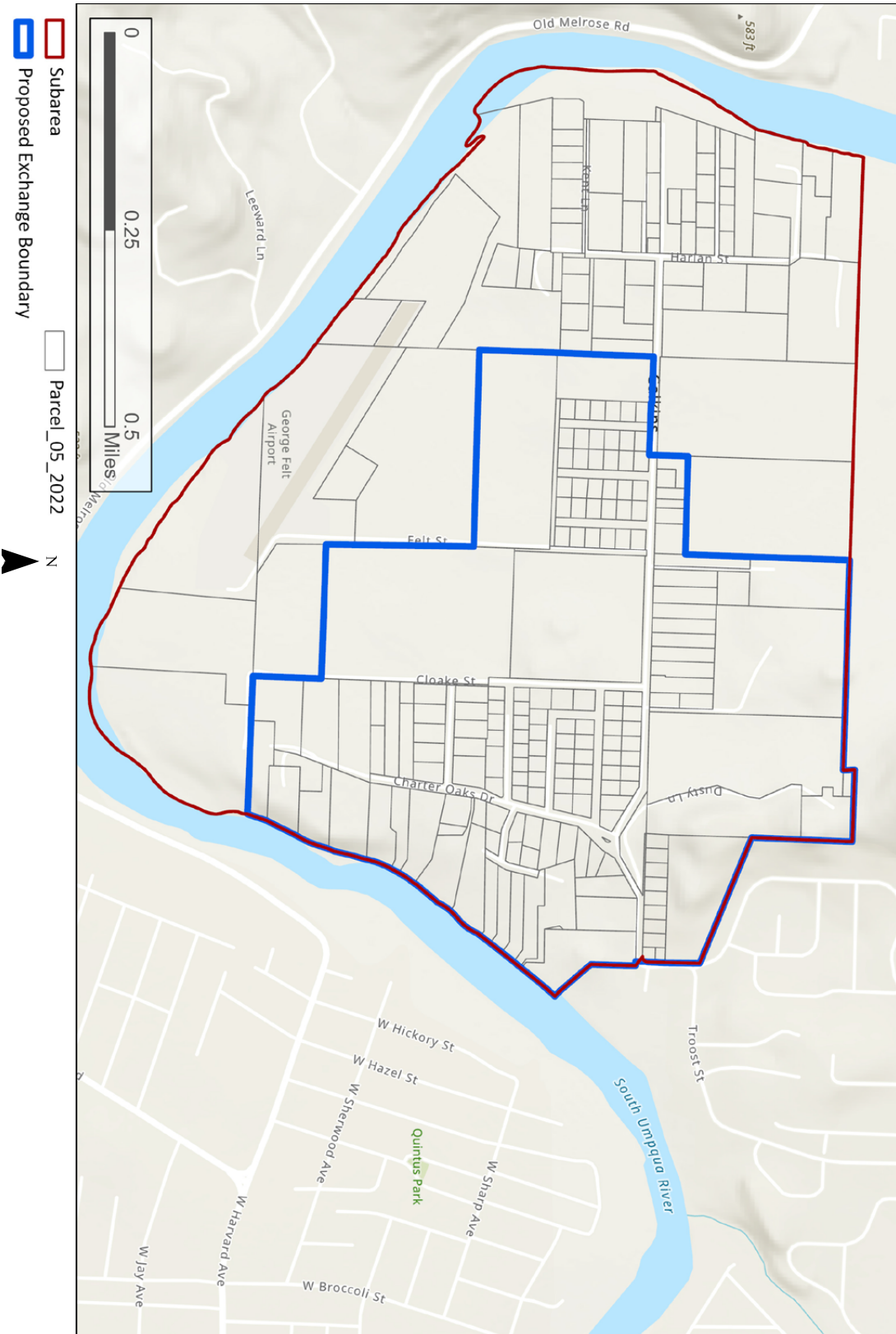
Based on the density analysis, the City projects approximately 646 potential dwelling units to be removed from the UGB in exchange for approximately 673 dwelling units to be included in the proposed area for the exchange. This results in a net increase of 13 dwelling units from the land exchange. Roseburg 2019 HNA forecasts a demand of approximately 1,875 new single family detached and single family attached units between 2019-2039. Assuming that all or a portion of the Exchange Area develops over the course of the next twenty years, the available density makes up only about 36% of the forecasted demand. Assuming that properties annex into the City in order to connect to public utilities with an R7.5 zone applied to all developable land of within the current proposal, at a lot size of 7,500 sq. ft, and the same assumption used that regardless of zoning designation that developable areas with slope (31 acres in Exchange Area) will develop with 1 dwelling unit per 15,000 square feet, a maximum number of 673 Total Dwelling Units may be provided.



City of Roseburg
Urban Growth
Boundary Exchange

Final Exchange Area Proposed

Exhibit 80, Final Exchange Area Proposed



6. FINAL GOAL 14 COMPATIBILITY OF SURROUNDING LANDS TO EXCHANGE AREA

The refinement of the Exchange Area is complete. To further consider the potential impacts and compatibility of the proposed final Exchange Area to the existing farming practices, the City used historical aerial imagery to review the surrounding properties. The City also reached out to two separate land owners that have lived in the Charter Oaks subarea for more than 15 years to provide anecdotal evidence to support what the aerial images show.

Demonstrated in the following Exhibits 81-88 is a series of aerial images of the Charter Oaks area taken at approximately one decade intervals. Images of the area were collected in 1979, 1989, 1998, 2002, 2008, 2013, and 2019. These images were overlayed over the most recent aerial images (2022) of the Exchange Area to be included into the UGB, with the immediate surrounding lands that were captured by the historical aerial images. Excepting the 1989 flight, each set of images contains four orthophotos with identical extents. The 1989 flight did not cover as extensive a range as the other six flights and only two of the four standard extents are included. The City also included the most recent aerial images (2022) as an individual exhibit to demonstrate that with the most up to date images, farming practices in the area have generally remained unchanged.

The flights were all conducted at various times of the year but generally the images show the Charter Oaks area during the late spring and early summer. This series of images shows the properties currently zoned by Douglas County as FG (Exclusive Farm Use – Grazing) that are proposed to be included in the Exchange Area taken at various points throughout time. The orthophotos clearly show that the lots have been used as fields for grasses or various herbaceous plants. The aeriols show occasional rows or vehicle tracks indicating that the fields were used for haying, but there is no evidence from the historical imagery of any orchards, livestock grazing, or other fruit and vegetable cultivation. In addition, there is no evidence of irrigation to any of these properties from the orthophotos.

From the aerial imagery evidence, the City finds that there has been minimal farming activity on the lots zone FG included within the UGB Exchange since 1979. This minimal farming activity would continue as it has been on the adjacent properties to the proposed Exchange Area.

To further investigate if any of the lots in the proposed Exchange Area have been historically used as farms the City examined the assessor record for the lots zoned as FG to see if the properties had a special assessment for Exclusive Farm Use. The City excluded the properties in the Fairlea subdivision zoned as FG as these lots were platted for residential use. The City knows from internal records that none of these 36 lots in the Fairlea subdivision are receiving special assessment for Exclusive Farm Use. The City examined the assessor records to consider impacts to farming practices for the following properties:

R15265, R15225, R15241, R15121, R15073, R148880, R15081, and R14905.

Of the eight properties investigated, only one had a special assessment for Exclusive Farm Use. This property is R15265, owned by Kodiak LLC, and has a special assessment of \$16,713. According to Jody O'Connor, the Douglas County Farm-Forest appraiser, R15265 is currently being leased by the property owner to another farmer for hay production for ryegrass seed. This confirms the identification suggested by historical imagery that these lots are only being used minimally for the cultivation of grasses. In order to confirm this assumption, the City reached out to the property owner, who stated: "You are correct, we are solely using the property for hay. Unfortunately the property does not have access to viable irrigation, so the yields are not strong and the nutrient density is low-meaning that the grazing is not the best option either. The impacts to historical farm use would be negligible."

In addition to this property, the City spoke with a resident who resided on NW Troost Street in the proposed Exchange Area who recalled from the years that they lived there: “During that 16 years, there was very little agricultural activity on any of the lands surrounding us. Some years (not all), the grass south of Troost was mowed and baled for hay. Two (maybe three) of the years we were there, sheep would be dropped off in the field behind us (north) to graze for less than a month and then picked back up. I’m assuming this was done for the owner to have some record of farm use to be able to realize reduced taxes. The grazing quality was poor enough that the sheep would often end up in my front yard during the short time they were there.”

Through the evaluation of the historical aerial images, and after gaining anecdotal information from residents with lived experience in the proposed Exchange Area, the City finds that the surrounding area will maintain Goal 14 Compatibility of surrounding land uses with the proposed urban uses.

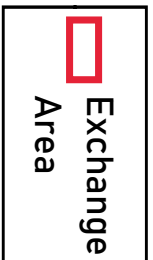
The final Exchange Area proposed is shown in Exhibit 80. Through refinements to the subarea that removed non-priority or constrained lands, engaging in a preliminary density calculation to best match the amount of density being removed from the UGB with the amount of density possible with the Exchange Area included, and an additional consideration on the compatibility of surrounding non-urban uses, the City has determined the final Exchange Area. Consideration has been given to remove as much of the high-value farmland, and ensure that the final proposed Exchange Area best meets the Goal 14 Location Factor #4 for compatibility with surrounding uses.



City of Roseburg
Urban Growth
Boundary Exchange

Exchange Area
Historical Imagery: 1979

Exhibit 81, Exchange Area Historical Imagery: 1979

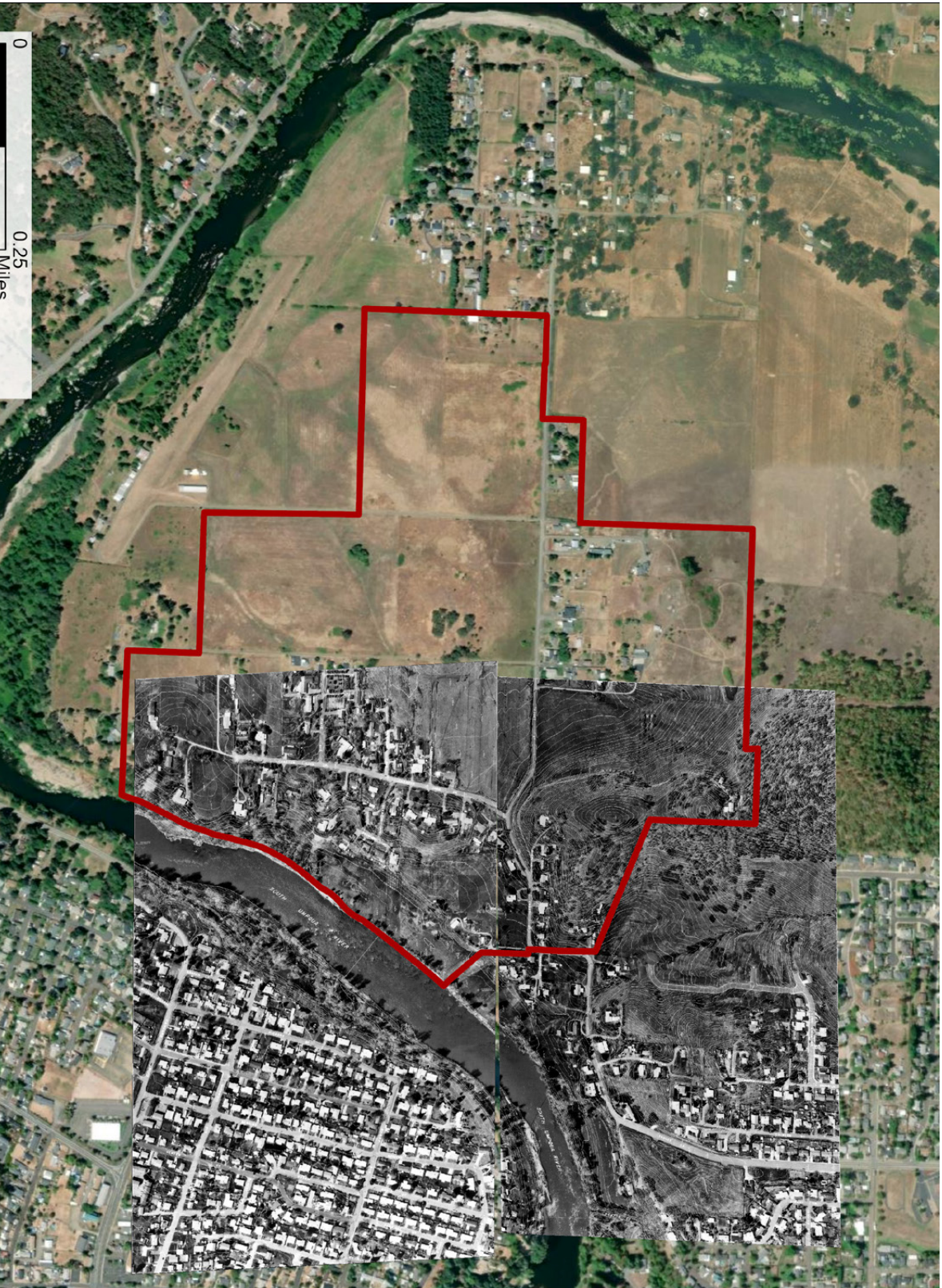




City of Roseburg
Urban Growth
Boundary Exchange

Exchange Area
Historical Imagery: 1989

Exhibit 82, Exchange Area Historical Imagery: 1989





City of Roseburg
Urban Growth
Boundary Exchange

Exchange Area
Historical Imagery: 1998

Exhibit 83, Exchange Area Historical Imagery: 1998

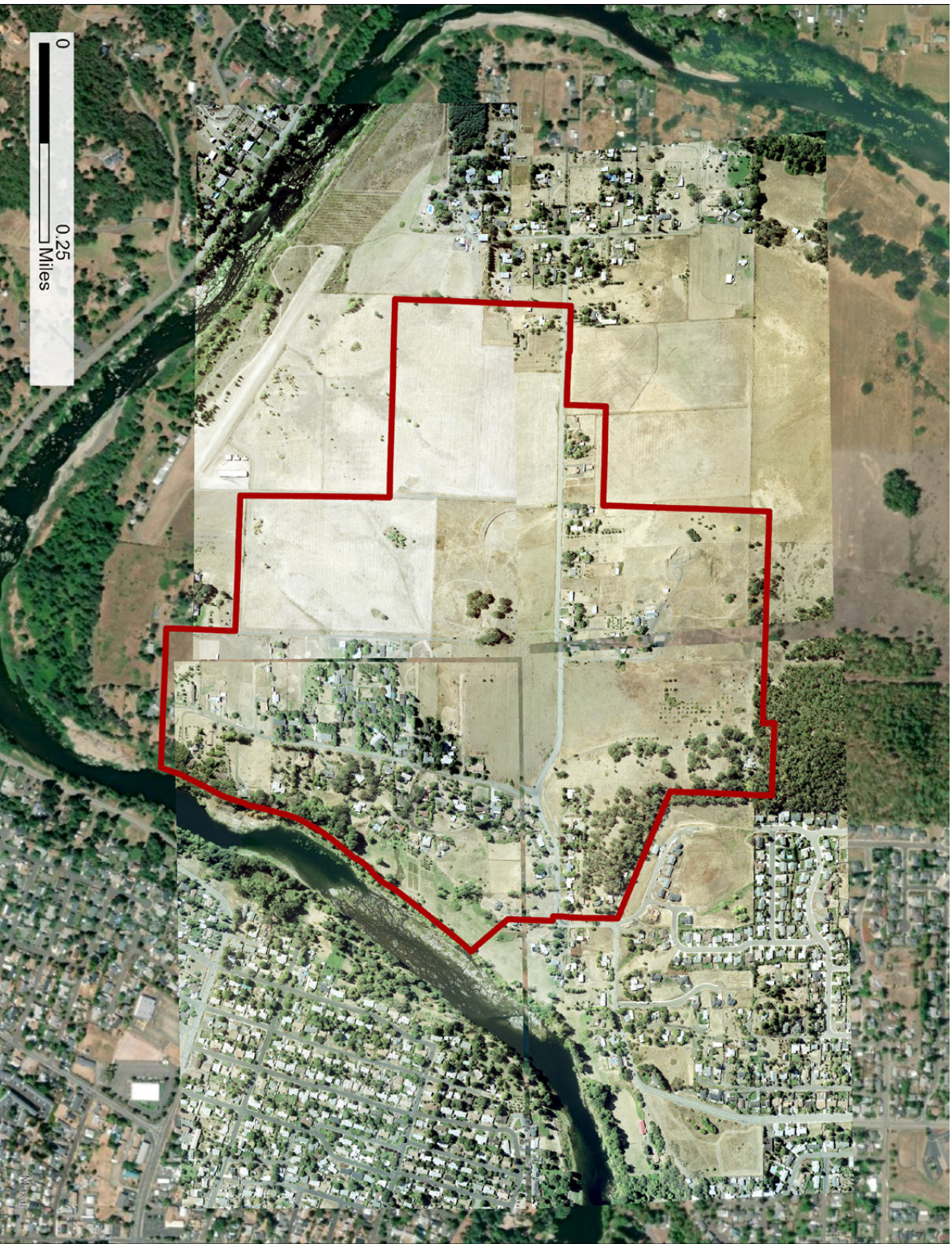
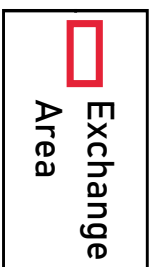




City of Roseburg
Urban Growth
Boundary Exchange

Exchange Area
Historical Imagery: 2002

Exhibit 84, Exchange Area Historical Imagery: 2002





City of Roseburg
Urban Growth
Boundary Exchange

Exchange Area
Historical Imagery: 2008

Exhibit 85, Exchange Area Historical Imagery: 2008



Exchange
Area





City of Roseburg
Urban Growth
Boundary Exchange

Exchange Area
Historical Imagery: 2013

Exhibit 86, Exchange Area Historical Imagery: 2013





**City of Roseburg
Urban Growth
Boundary Exchange**

**Exchange Area
Historical Imagery: 2019**

Exhibit 87, Exchange Area Historical Imagery: 2019





City of Roseburg
Urban Growth
Boundary Exchange

Exchange Area
Historical Imagery: 2022

Exhibit 88, Exchange Area Historical Imagery: 2022



Insert Exhibit 88, Exchange Area Historical Images-2022



Image Credit:
Landsat 8

3. CONSISTENCY WITH STATEWIDE PLANNING GOALS

This section addresses compliance with applicable Statewide Planning Goals.

A. GOAL 1: CITIZEN INVOLVEMENT

“To develop a citizen involvement program that insures the opportunity for citizens to be involved in all phases of the planning process.”

Finding: Statewide Planning Goal 1 requires cities to create opportunities for citizens to be involved in all phases of the planning process. The Roseburg Planning Commission acts as the Committee for Citizen Involvement. The forum in which they meet provides an opportunity for citizen participation in all phases of the comprehensive land use planning process.

The City of Roseburg facilitated the public participation of residents living in areas affected by the UGB Swap through mailing property owners, publishing notices of open houses in the newspaper and on social media, and holding informational discussion sessions at public meetings. A full timeline of public participation is found in Table 25. The City has also used staff time to hold one-on-one meetings and phone conversations with citizen stakeholders, including property owners and other community members who may be affected by the UGB swap. An initial proposal concept and subsequent updates have been presented at public City Council meetings throughout 2018-2022.

The City held public open house meetings about the UGB Swap in November 2018 and April 2019. In order to reach the citizens affected by the land use decision, the City mailed notice of these open house meetings to 168 property owners residing within the Charter Oaks Study Area. At the first open house in November 2018, the Community Development Department staff gave a presentation explaining the purpose of the UGB swap and facilitated a question and answer session with attendees. The second open house in April 2019 provided further clarification and allowed for additional questions and comments. Based on the citizen feedback and concerns collected from the initial open house, the City prepared and provided detailed answers on questions of taxation, annexation, street improvements, and utility availability.

The City also used news outlets and social media to advertise meetings ahead of time. A public notice was published twice on the City’s Facebook page leading up to each meeting, and a press release was published in the News Review, Roseburg’s local newspaper. Email addresses of attendees at the November meeting were collected voluntarily and used to send a targeted email reminder about the follow up open house in April. Overall, 27 households signed the attendance sheet for the November 2018 meeting and 67 households signed in for the April 2019 meeting. These numbers may not capture the full scale of citizen participation at the open houses as signing the attendance sheet was optional.

Additional public outreach will continue in the future. A third public open house is planned to occur prior to the public hearing process.

Review, recommendations, and final decision concerning the application will require public hearings before the City Planning Commission, the Douglas County Planning Commission, City Council, the Douglas County Board of Commissioners, and the Oregon State Land Conservation and Development Commission (LCDC). Each of these governing bodies will be required to provide opportunity for public comment through their own public hearing concerning the application as it navigates its way through the decision making process. The public is encouraged to participate during these hearings throughout the process.

Since the initial project concept was announced in the fall of 2018, the City has maintained information on the official City of Roseburg website for the public to access. After the open houses, the City published the presentations for those to access who could not attend. The City encouraged the people who went to the meetings to continue to check the website to stay informed. The latest information regarding the UGB Swap can be found under the “Department News” section of the Community Development Office’s page. The City will continue to publish new information on the website about the project as it becomes available.

Table 25, Timeline of Public Involvement

Activity	Date	Notes
Presentation at City Council Meeting	9/24/18	CDD staff present the initial project concept to the City Council.
Open House/Public Meeting #1 notice mailed to Charter Oaks residents	10/26/18	
Open House/Public Meeting #1	11/13/18	Open House held at Hucrest Elementary
Open House/Public Meeting #2 notice sent out on citizen email list	4/9/19	
Open House/Public Meeting #2 notice released in newspaper & online	4/9/19	
Open House/Public Meeting #2	4/23/19	Open House held at Roseburg Public Library
Presentation of Housing Needs Analysis (HNA) at Planning Commission Public Hearing	8/5/19	HNA is recommended by the Planning Commission to the City Council for adoption. UGB Swap is identified as a key project to provide suitable land for housing
Presentation and adoption of HNA at City Council Public Hearing	8/26/19	HNA is adopted by City Council, the CDD advise Council that they will move forward with the UGB swap project
2020-2022 Goal Setting at City Council Special Meeting	11/12/19	City Council discusses the creation of a goal to “Develop and Implement Policies to Enhance Housing Opportunities,” including the UGB swap as an action item under this new goal.
2020-2022 Goal Setting at City Council Special Meeting	12/03/19	“Pursue Urban Growth Boundary Swap” discussed as an action item for City Council goal on housing, later adopted.
Project Update at City Council Meeting	3/8/21	CDD provides a post-adoption HNA update including about continuing work on the UGB swap.
Public Meeting #3	TBD	

B. GOAL 2: LAND USE PLANNING

“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.”

Finding: Roseburg’s land use planning process and policy framework is provided in the City’s Comprehensive Plan and implementing ordinances. They are developed in accordance with statewide planning goals adopted by DLCD. Roseburg’s first comprehensive plan was adopted in 1973. It contained an analysis of past trends shaping growth and identified goals and objectives for guiding future development. Following the passage of Senate Bill 100 in 1974, legislation required all cities comprehensive plans to conform to the 14 statewide goals codified in ORS Chapter 197. As a result, in 1978 the City of Roseburg conducted an in-depth review and evaluation of the current plan and concluded that major revisions would be needed. A Citizens Advisory Committee, with technical staff assistance, drafted the new Roseburg Urban Area Comprehensive Plan for adoption in 1981. LCDC acknowledged the plan, approving it to be in compliance with the statewide planning goals.

The plan provides a guiding framework and establishes a means for consistent, coordinated land use planning decisions across public agencies. It guides the development of public resources and implementation of long-range planning activities carried out by governing bodies. It also provides the public with guidelines for individual planning decisions. The Comprehensive Plan and its accompanying appendices are designed to act as the prevailing policy document for the City.

There are a number of supporting plans, adopted through the public process, that serve as an addendum to the Comprehensive Plan. These documents refine the broad goals, objectives, and policies and provide specific guidance and recommendations on how such elements can be carried out. They can provide up to date inventories, factual information applicable to statewide planning goals, and evaluations of courses of action. One such document is the Roseburg Transportation System Plan (adopted in 2006, updated in 2019), which acts as an updated Transportation Element within the Comprehensive Plan.

Another example of this includes the Roseburg Housing Needs Analysis, prepared in 2019 through funding by DLCD. The HNA report provides the City with a factual basis to update the Housing Element of the City’s Comprehensive Plan. Roseburg City Council adopted the HNA as a supporting document to the Comprehensive Plan on August 26th, 2019. Inside the report, a UGB swap is identified as a suggested action to help meet future housing needs (elaborated upon in section Goal 10: Housing). The City’s application for a UGB swap is directly supported by the findings of the HNA, in compliance with the Comprehensive Plan.

Further stated in Goal 2 is the idea that all city, county and state agency land use plans must be consistent with the comprehensive plans of each jurisdiction. The City of Roseburg and Douglas County coordinate consistent comprehensive plans that establish a UGB and a plan for the undeveloped lands inside the UGB known as the Urban Growth Area (UGA). The City and County also have an intergovernmental agreement known as an Urban Growth Management Agreement (UGMA), adopted in 1984 and last updated in 1994. This agreement shares a common concern between city and county regarding the development and use of lands within the UGA. As stated in section 10.1. of the UGMA, the City and County agreed to establish the Charter Oaks Area (Study Area #1) as an Area of Mutual Interest. The purpose of establishing this area is for the provision of urban services and future urbanization. This agreement within the UGMA shows the consistency across governmental bodies about the long-range plans for the area. The City finds that through this procedural process demonstrated in the previous sections of this proposal, as well as the coordination occurring between multiple levels of government throughout the process to approve the proposed action satisfies Goal 2.

C. GOAL 3: AGRICULTURAL LANDS

Not applicable pursuant to OAR 660-024-0020(1)(b). See the Study Area analysis for discussion about agricultural lands.

D. GOAL 4: FOREST LANDS

Not applicable pursuant to OAR 660-024-0020(1)(b). See the Study Area analysis for discussion about forest lands.

E. GOAL 5: OPEN SPACES, SCENIC AND HISTORIC AREAS AND NATURAL RESOURCES

“To protect natural resources and conserve scenic and historic areas and open spaces.”

Finding: Under Goal 5 local jurisdictions are required to adopt programs that protect natural resources and conserve scenic, historic, and open space resources for current and future generations. In order to design these programs, local governments must inventory 12 types of resources including riparian corridors, wetlands, and wildlife habitats. Local governments are also encouraged, but not required, to inventory historic resources, open spaces, and scenic views & sites. Areas with significant resources must be identified and protected in accordance with OAR 660-023.

In order to do a comprehensive review of Goal 5 resources within the area selected for the UGB exchange (Charter Oaks subarea) and exiting UGB areas being removed (Serafin and Atkinson properties), the City had to pull the best available data from multiple sources. In the case of the Charter Oaks area currently outside the Roseburg UGB, the City referenced Goal 5 resource inventories created by Douglas County as well as supplemental data from the Oregon Department of Fish & Wildlife (ODFW), US Fish and Wildlife Services (USFW), the Oregon Department of State Lands (DSL), and the Federal Bureau of Land Management (BLM). The age and detail of the datasets from the best available resource inventories varies. Those found in the Douglas County Comprehensive Plan elements on Natural Features, Water Resources, and Cultural & Historic Resources were created in the early 1980s with a handful revised in 1997. As a result, the City worked to locate recent, site specific data when possible. For example, the City obtained a preliminary wetlands delineation review for two properties in Charter Oaks in 2020, provided by the property owner. The purpose of this was to aid in the determination of an appropriate boundary line for the exchange area, based on a current survey of identified wetlands.

The City’s Goal 5 Resources Plan is found in the Natural Resources Element of the Roseburg Urban Area Comprehensive Plan, which is implemented through regulations in the Roseburg Municipal Code. The specific local programs established by the Municipal Code are addressed in the Natural Resources Element section. Below is a review of all 15 resources inventories for the affected areas:

a. Riparian corridors, including water and riparian areas and fish habitat:

The South Umpqua River runs southeast to the proposed exchange area in Charter Oaks, with some parcels bordering the river bank. Douglas County, through consultation with the ODFW, has designated a 50 foot corridor for riparian vegetation around the streambanks of all important perennial and intermittent streams in the county, including the South Umpqua River. ODFW specifies that a 50 foot setback for all structural development shall be adequate to protect riparian vegetation corridors in the Douglas County Comprehensive Plan. The proposed exchange area runs along the South Umpqua River at its southeast border, resulting in an area of land around the riverbank being inventoried within the county's Riparian Vegetation Corridor Overlay Zone. Following adoption of the UGB swap, these lands will be identified within the City's Riparian Habitat Protection Overlay to ensure the area continues to be protected at a similar level. Further details about the Overlay Zone is detailed in the Natural Resources Element section.

Nearly all of Roseburg City limits, UGB, and the proposed exchange area is included in ODFW's Conservation Opportunity Areas (COA) for the North and South Umpqua Rivers. ODFW developed COAs to guide voluntary conservation actions. They do not serve as an official regulatory boundary nor do additional land use regulations apply. For the "South Fork Umpqua River and Tributaries, COA 91," where the proposed exchange area is located, the recommended conservation actions include the maintenance of riparian habitat and ecological function. The City's riparian habitat overlay mirrors this recommendation. The City will continue to be in conversation with ODFW about the conservation of riparian areas.

b. Wetlands:

The general direction of Goal 5 and the Roseburg Comprehensive plan points towards the regulation and protection of wetland areas, with some exceptions.

Douglas County has an inventory of "Significant Wetlands" which are identified as having good to excellent quality. The exchange area does not contain any significant wetlands.

Roseburg does not have a DSL-Approved Local Wetlands Inventory, so the City referenced the national inventory from USFW. According to the National Wetlands Inventory, there are pockets of freshwater emergent wetland identified in the proposed exchange area totaling 17 acres. The City also referenced a report which preliminarily delineated wetlands of a specific site, mentioned in **Appendix 3**, which ended up being excluded from the final exchange area. Even with efforts to exclude identified wetlands from the exchange area, it is impossible to eliminate all wetlands, mainly due to the proximity of the South Umpqua River.

There are procedures in place to regulate construction and development in and around wetlands at the site specific level. The City's Municipal Code requires the locations of all wetlands within a property to be mapped out during a Site Review in order to issue a permit. When wetlands, waters or certain soils are mapped within or partially within the project area, the City must submit a Wetland Land Use Notification (WLUN) to the DSL. DSL staff works with the site developer to determine if their construction plans are permissible according to DSL regulations. Development of areas containing wetlands outside of the floodway will continue to be considered on a case-by-case basis, in compliance with state and local laws.

c. Wildlife Habitat:

Douglas County conducted an inventory of special bird habitats with the assistance of ODFW for the County Comprehensive Plan. The inventory reports no special bird habitat within the proposed exchange area. However, a Blue Heron Rookery Site, which spans across the South Umpqua River at 27S 06W 22 NW, was identified south of the proposed exchange area (see Exhibit 89 below). ODFW identifies heron habitats by quarter sections rather than individual nesting sites, providing a buffer area much larger than the actual rookery site itself. Blue Heron commonly nest in vegetation near the water's edge, indicating that the heron habitat in this situation, could overlap with portions of the river, its floodway and the county riparian vegetation corridor. It's important to note that this inventory was conducted prior to 1980 and has not been updated in the years since its adoption. Blue Herons can be migratory birds. Although evidence of herons exists along a majority of the South Umpqua River, no work to substantiate whether or not the Blue Heron rookery identified in the County's Comprehensive Plan since 1980 has occurred.

The Blue Heron Overlay Zone already overlaps with the UGB further to the south, however this proposal does not cause the UGB to further expand into this area. The overlapping floodway and riparian vegetation corridor already keeps development in the area to a minimum. The UGB swap is unlikely to affect the conditions of the habitat.

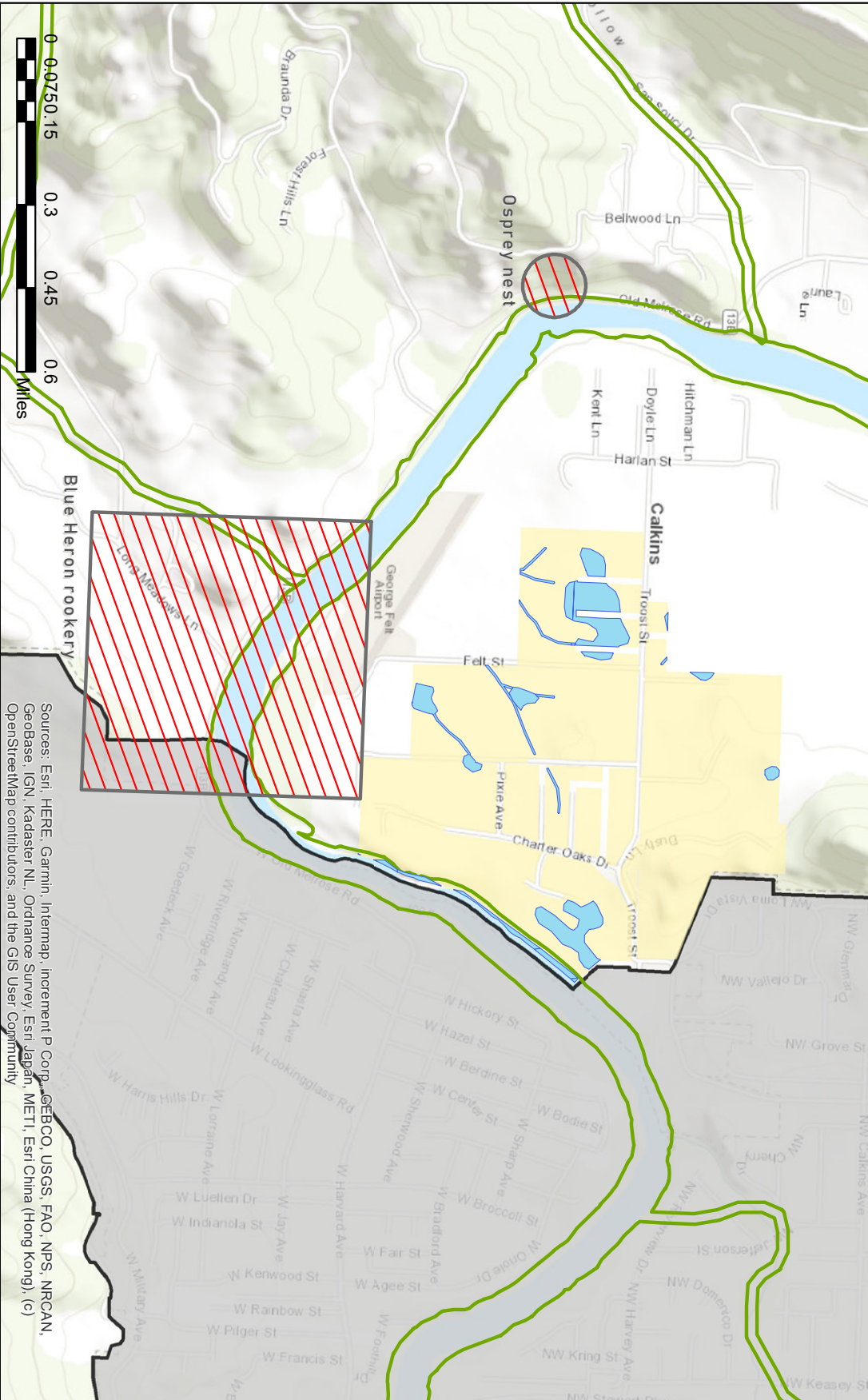


City of Roseburg Urban Growth Boundary Exchange Expansion Area Goal 5 Resources



- Statewide Wetlands Inventory
- Bird Habitat Overlay
- Riparian Vegetation Corridor
- UGB Expansion Area
- UGB

Exhibit 89, Exchange Area Goal 5 Resources



Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, Geobase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community

Douglas County categorizes all lands within its Big Game Habitat Overlay. All areas surrounding the Roseburg UGB are classified as “Impacted.” The county defines impacted areas as “developed areas no longer considered to be viable big game habitat.” This does not mean that big game do not live within the area, but rather that a majority of big game do not reside there as a result of human development. The county does not regulate the use of land in any way within impacted areas to encourage the growth or maintenance of big game populations. Subsequently, exchange of the UGB into this area will have no effect on the management of big game habitats. Lands entering the UGB will ultimately come under city jurisdiction and the overlay will no longer apply. The lands exiting the UGB will fall under the county’s Impacted Big Game Habitat overlay, with no additional restrictions.

No significant wildlife habitat has been inventoried in the areas proposed to exit the UGB.

d. Federal Wild and Scenic Rivers:

The South Umpqua River is not a designated National Wild and Scenic River. The City finds this resource not applicable.

e. State Scenic Waterways:

The South Umpqua River is not a designated State Scenic Waterway. The City finds this resource not applicable.

f. Groundwater Resources:

The areas affected by the UGB swap are not located within an identified Groundwater Administrative Area or Critical Groundwater Area by the Oregon Water Resources Department (OWRD). Historically, residents living on wells west outside of the City limits have reported inadequacies in “both quantity and quality of water” (“Rural People Join Hands to Obtain Water”, Umpqua Basin Water Association 1966). It is not uncommon for wells to run dry during the summer, and this issue can be compounded by multiple wells in close proximity. Some residences in the proposed exchange area are currently served by city water and others are not. Following the adoption of the UGB Swap and subsequent annexation, many homes will be better served by public facilities to compensate for the reported lack of adequate groundwater. Public Facilities and Services are addressed more in depth in Goal 11.

g. Approved Oregon Recreation Trails:

There are no Approved Oregon Recreation Trails within the areas proposed to enter or exit the UGB. The City finds this resource not applicable.

h. Natural Areas:

“Natural areas” as defined by statute are areas listed in the Oregon State Register of Natural Heritage Resources. No area affected by the UGB swap is listed under such designation. The City finds this resource not applicable.

i. Wilderness Areas:

There are three federally listed wilderness areas in Douglas County, none of which include the areas affected by the UGB swap. The City finds this resource not applicable.

j. Mineral and Aggregate Resources:

Douglas County identifies no areas of Significant Mineral Resources within the proposed exchange area in the County Comprehensive Plan Goal 5 Inventory. Similarly, the Roseburg Urban Area Comprehensive Plan identified two sites with significant mineral and aggregate resources, neither of which includes the areas proposed to exit the UGB. The City finds this resource not applicable.

k. Energy sources:

No significant energy sources are identified in the affected areas by the Roseburg Urban Area Comprehensive Plan or the Douglas County Comprehensive Plan. Avista Utilities provides electric and natural gas service to the proposed exchange area, but does not draw from any energy source within the area itself. The City finds this resource not applicable.

l. Cultural areas:

The Douglas County Comprehensive Plan Goal 5 Inventory identifies no significant cultural areas that overlap the proposed exchange area. Similarly, there are no inventoried cultural areas in the City's Comprehensive Plan for the lands exiting the UGB. The City finds this resource not applicable.

m. Historic Resources:

No significant historic resource sites are identified in the proposed exchange area by the Oregon Heritage State Historic Preservation Office's Statewide Inventory. The Statewide Inventory includes properties officially designated by the National Register of Historic Places and the National Parks Service. The City finds this resource not applicable.

n. Open Space:

ORS 660-023-0220 defines open space as including "parks, forests, wildlife preserves, nature reservations or sanctuaries, and public or private golf courses." The proposed exchange area does not contain any land with these uses. The current zoning designations applied to the Charter Oaks area are Rural Residential (RR) and Farm Use- Grazing (FG), with lands developed for residential use or remaining undeveloped and vacant. Future urbanization can occur in this area with little impact on open space.

The Serafin property contains 193± acres that are proposed to be withdrawn from the UGB. Under city zoning, these parcels are currently designated R10 for low density residential. The City proposes to rezone a portion of this area to the county designation of Farm Forest (FF), and the remaining portion as Rural Residential 5 acre (5R). This will increase designated forest space outside of the UGB that can be appropriately regulated according to the county's land use and development ordinance.

o. Scenic Views and Sites:

The Douglas County Comprehensive Plan identifies no official designation of scenic views and sites within the proposed exchange area. BLM applies a scenic class to 15 locations in the County, none of which are in the proposed area. Additionally, the Oregon Department of Transportation (ODOT) identifies no Scenic Highway Areas within the proposed area. OAR 660-023-0230 defines scenic views and sites as "lands that are valued

for their aesthetic appearance.” Scenic quality is something that may be appreciated anywhere, however no significant inventoried site exists within areas affected by this proposal. Programs and policies that work to preserve other resources, such as the riparian zones, also work to preserve the natural aesthetic appearance of an area.

F. GOAL 6: AIR, WATER AND LAND RESOURCES QUALITY

“To maintain and improve the quality of the air, water and land resources of the state.”

Finding: Goal 6 requires that all waste and process discharges from existing and future development will not threaten to violate or violate applicable state or federal environmental quality statutes, rules, and standards. The proposed UGB exchange is not anticipated to have an impact on the quality of air, water and land resources greater than that of regular urban residential development.

The City finds that air, water and land resource quality will be addressed by a combination of activities that minimize, mitigate or avoid conflicts with Goal 6 such as: City participation in a rigorous floodplain management program, application of the Riparian Habitat Protection Overlay and Hillside Development Overlays when appropriate, and updating the Storm Drainage Master Plan to include the UGB exchange area.

Future development will be required to mitigate any work which will impact the amount of wetlands mapped by local surveyors and the National Wetlands Index. Local governments coordinate with the Department of State Lands to ensure that all construction projects involving sites with wetlands require a review process and permit to proceed.

Extension of the sewer main into the Charter Oaks by Roseburg Urban Sanitary Authority (RUSA) and water main upgrades and extensions will occur in compliance with all state and federal requirements to ensure that air, water and land quality requirements are satisfied.

Findings addressing the Comprehensive Plan’s policies for Goal 6 are contained within the Natural Resources Element, Public Facilities and Services Element, and Land Use and Urbanization Element.

G. GOAL 7: AREAS SUBJECT TO NATURAL DISASTERS AND HAZARDS

“To protect people and property from natural hazards”

Finding: The portions of some properties included in the UGB swap are subject to floods, landslides, and other natural disasters. The City has adopted a natural hazard mitigation plan in partnership with Douglas County and employs programs and regulations to manage risks associated with the identified hazards.

The Douglas County Multi-Jurisdictional Natural Hazard Mitigation Plan (NHMP) is a joint effort by the county and local governments, including the City of Roseburg, first created in 2003 and last updated in 2016. The NHMP is recognized by the Oregon Emergency Management Department and by FEMA at the federal level, which enables the county to access disaster relief funding. The City chose to participate with the County in the plan’s creation. Experts were consulted in order to determine issues involving the city’s natural hazard risks, vulnerabilities, hazard history, and mitigation strategies. Risks identified and assessed include: drought, earthquake, flood, landslides, tsunamis, wildfire, windstorm, and winter storms. The plan also includes community-specific recommendations and action items that the City can engage in to reduce

risk. Recommendations in the NHMP are closely related to the goals and objectives of existing planning frameworks, such as the Comprehensive Plan, Municipal Code, and Storm Drainage Master Plan. Opportunities to implement the recommendations are provided through local programs.

Natural hazards, by nature, are not limited by political boundaries such as city limits or UGBs. Roseburg's hazard identification, vulnerability assessment, and risk analysis within the NHMP can be applied to the general adjacent local area, including the areas proposed to enter the UGB. The recommendations for hazard mitigation will include the new areas located within Charter Oaks following adoption of this proposal.

The floodplain extends down the bank of the South Umpqua River in the exchange area, along an alluvial terrace that runs through the rear yards of developed properties paralleling NW Broadway St and Charter Oaks Dr (see Exhibit 90). FEMA FIRM maps show that the entirety of this flood hazard area is Zone AE, or the federal regulatory floodway. Since the South Umpqua River and its floodplain run through the city limits, the City is well equipped with flood mitigation regulations and programs to manage this hazard. Roseburg is a participating community in the National Flood Insurance Program (NFIP) and the Community Rating System implemented by FEMA. The Community Rating System (CRS) is a voluntary incentive program that recognizes floodplain management practices that exceed the minimum requirements of the NFIP, resulting in discounted flood insurance premium rates for residents. Under the CRS, the City addresses the need to foster comprehensive floodplain management.

Part of Roseburg's floodplain management practice includes the use of a floodplain zoning overlay, set forth in Roseburg Municipal Code 12.04.090. The floodplain overlay's purpose is to protect human life and health, through the preferred method of avoiding sites in the base floodplain. All structures that must be located in the floodplain follow special development regulations. Areas within the overlay that are considered "special flood hazard areas (A Zones)" have the most restrictive regulations applied. These regulations effectively prevent the approval of development in the floodway without technical reports and the assurance that development will not result in any increase in flood levels during the base flood discharge. The City is a CRS community that is motivated to apply standards at or higher than the federal regulation in order to keep in good standing, which means that development in the floodplain overlay is not encouraged. The floodway and floodplain in the proposed exchange area also overlap with the Riparian Protection Overlay, which requires a 50-foot development setback from the bank.

The City also has surface water drainage provisions for site improvement requirements set forth in Municipal Code 12.06.30 which serve as another flood mitigation tactic. The code requires that site drainage does not increase in volume over natural or pre-project flows. Acting with all of these policies together demonstrates the City's priority to minimize risk associated with flooding.

The topography of the proposed exchange area is generally flat. However, there are some areas with a slope greater than 12% on the eastern side close to the current UGB. There are no historic landslide sites inventoried in DOGAMI's Statewide Landslide Information database for the areas affected by the proposal. Following future annexation, any area with a slope greater than 12% will be brought into the Hillside Development Overlay, set forth in Roseburg Municipal Code 12.04.100. The Hillside Development Overlay provides regulations to address topography, geology, hydrology, and fire risks.

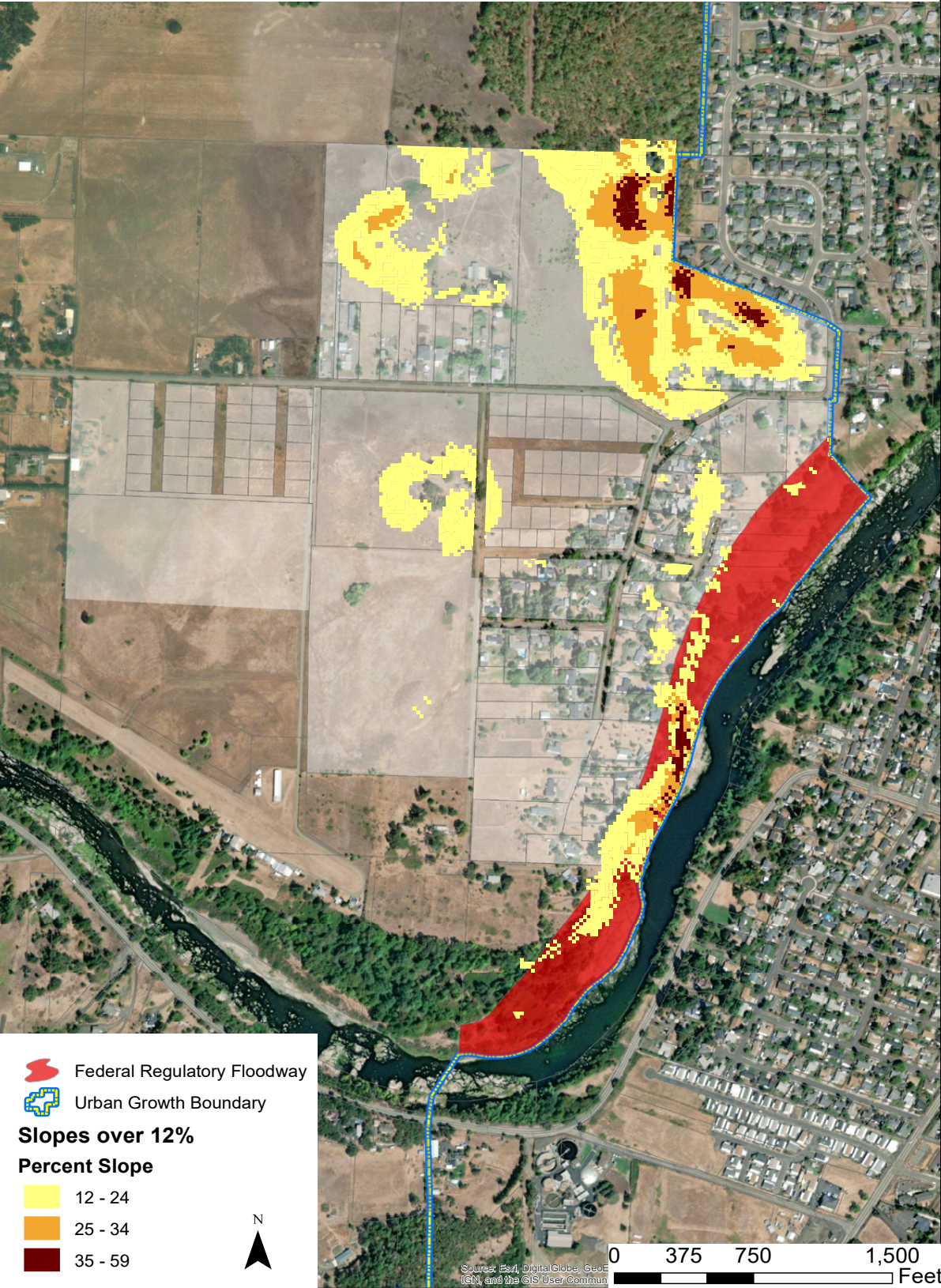
The majority of the area proposed to exit the UGB (Serafin and Atkinson properties) is on steep slopes. After these areas enter back into the county, they will no longer fall under the Hillside Development Overlay. However development will continue at a much lower density after the swap due to the zone change from City

Low Density Residential (R-10) to County 5-acre Rural Residential (R-5). This is beneficial as a lower density of development will reduce the overall risk to life and property from landslides. All future development will conform to county development standards.



City of Roseburg
Urban Growth
Boundary Swap

Exchange Area Natural Hazards (Goal 7 Areas)



H. GOAL 8: RECREATIONAL NEEDS

“To satisfy the recreational needs of the citizens of the state and visitors and, where appropriate, to provide for the siting of necessary recreational facilities including destination resorts.”

Finding: The City of Roseburg Parks system encompasses over 300 acres of park land, including 19 parks and numerous facilities within the UGB. A Comprehensive Parks Master Plan was adopted in 2008 following a multi-phase strategic planning process by the City and the Community Advisory Committee involving over 700 residents. The plan includes a Community Needs Summary which reports that Roseburg has a growing need for neighborhood parks, community parks, and natural area/greenspaces. The need for neighborhood parks is based on a standard that says a local park should be within walking distance of all residents (1/4 to 1/2 of a mile), in order to provide close-to-home recreation opportunities. The plan identified that an additional fourteen (14) neighborhood parks will be needed in specific areas by 2027, including joint ventures with the Roseburg School District to develop school parks. The analysis also reports a need for more recreation facilities including trails, soccer fields, and baseball fields.

The Comprehensive Parks Master Plan goal “maximize local resources for parks and recreation” encourages that before new park land is purchased, other publicly owned land will be examined for the potential to share space with park facilities. Additionally, the Parks Master Plan encourages school sites to be improved to provide park service to underserved neighborhoods and additional recreation facilities to meet future needs.

The Roseburg School District #4 owns several properties that it is holding for future school sites in key locations around the Roseburg urban area. One such property is a site outside of the UGB in Charter Oaks that is identified in the Comprehensive Parks Master Plan as “SP-6,” a site for a future school park. School parks will often have an additional play area that allows access by community members during the school day or improved fields that are shared by community sports groups and school programs under a joint use agreement. The Parks Master Plan states this is a large site that, when developed, should include a number of sports fields to serve the school and help meet the needs of the community sports organizations. Although the site is owned by the Roseburg School District who has final say over how this site is used, this site has the potential to meet the city demand for more recreational fields while also providing close recreational opportunities for the anticipated nearby residential growth. The School District has expressed that they would like to keep this site for future school use only, and has no interest in selling or developing the land for residential use. This land is proposed to enter the UGB under the Public, Semi-Public Comprehensive Plan designation.

The remainder of land proposed to enter the UGB is privately owned, and at this time there are no plans for acquisition of new lands for the purpose of creating recreation sites along the South Umpqua River or otherwise. Stewart Park, a regional park facility with over 200 acres of recreational land and riverfront access, is nearby and provides a natural and scenic experience to Roseburg residents and visitors. Opportunities to develop park new sites in the western exchange area could be explored if the need is assessed in a future update of the Parks Master Plan.

I. GOAL 9: ECONOMIC DEVELOPMENT

“To provide adequate opportunities throughout the State for a variety of economic activities vital to the health, welfare, and prosperity of Oregon’s citizens.”

Finding: There are no commercial or industrial zoned lands involved in the proposed UGB swap. As a result, the proposed amendment would have minimal direct effect on economic development. The UGB swap may indirectly have a positive economic impact on local property owners and developers, providing development opportunities which may not have previously existed.

J. GOAL 10: HOUSING

“To provide for the housing needs of citizens of the state.”

Finding: Goal 10 requires local governments to inventory buildable residential lands and encourage the development of a housing supply that varies in location, type, density, and affordability commensurate with the financial capabilities of households. The Housing Element of the Roseburg Urban Area Comprehensive Plan provides an analysis of housing needs for the area and policies to implement. The City recognized that the assumptions and findings on housing needs provided within the original Comprehensive Plan may not reflect the current conditions.

The directive to update the Comprehensive Plan to include a new HNA stemmed from the 2017-19 Roseburg City Council Goals adopted on April 24th, 2017. One of the goals states the following, *“Support and adopt policy development and implementation to enhance housing and community development.”* In response, City Staff sought funding for an HNA. The HNA would act as a starting point for developing policies and actions that would specifically address city goals around housing deficiencies that the community is currently experiencing. In fall of 2018, the City applied for a grant through the DLCD to fund an HNA as an update to the Comprehensive Plan. Grant funds were allocated to a professional consulting group who prepared the HNA in partnership with City staff. City Council adopted the findings of the HNA as an amendment to the Comprehensive Plan Housing Element on August 26th, 2019. Periodic coordination with DLCD staff occurred prior to, during, and after completion of the project and the City provided notice of the proposed legislative amendment to the DLCD by way of a Post Acknowledgement Plan Amendment notification.

The primary goals of the HNA were to: (1) project the amount of land needed to accommodate the future housing needs of all types within the Urban Growth Boundary (UGB), (2) evaluate the existing residential land supply within the UGB to determine if it is adequate to meet that need, (3) fulfill state planning requirements for a 20-year supply of residential land, and (4) identify policy and programmatic options for the City to meet identified housing needs.

Key findings of the HNA’s Buildable Lands Inventory (BLI) indicate that there is existing buildable residential lands within the current UGB land base, some with constraints to development. The BLI identifies 1,104 acres of buildable residential land in vacant (73%) or partially vacant (27%) lots. 885 acres of the buildable residential land is currently zoned Low Density Residential. However, a substantial amount of Roseburg’s buildable land is in areas with slopes that may make development more difficult and may further limit potential density in the area. Most dense urban development in Roseburg exists within the flat river valley. Development gradually thins out as it spreads upwards into the hillsides that surround the city. The BLI indicates that 568 vacant or partially vacant acres, two-thirds of the 885 acres identified for Low Density Residential use, is on land with a slope of 12% to 24.9%. The inventory includes moderately sloped lands and partially vacant lots because it is an

exercise of identifying all available land with any level development potential, regardless of other limitations.

Households in Roseburg are projected to need a wider range of housing types that are affordable to the median income over the next 20 years. The HNA found that Roseburg will have a demand for 2,678 new dwelling units for the 2019-2039 period, of which 60% will be single-family detached. Studies of demographic changes suggest an increased demand in single-family attached and multifamily housing. Regarding affordability, Roseburg's households will be increasingly priced out of the housing and rental market, should trends continue without intervention. The HNA reports that 35% of households are cost burdened, including 55% of renters and 20% of homeowners. At the same time, home prices are gradually increasing. From 2015 to 2018 the median housing sale price increased by 20% from \$188,400 to \$226,800. A household making the median income in Roseburg could only afford a home valued about \$143,500 to \$164,000. An economic analysis in the HNA determines that only households which make 170% the median yearly income or above can afford the median home sale price in Roseburg.

Under the best conditions, the HNA reports a surplus of buildable Low Density Residential land available in the UGB, however the relative cost of new units and availability of other types of housing is identified as an issue. Following an analysis of the present land supply and future demand, the HNA concludes that there is a surplus of Low Density Residential land, a tight supply of Medium Density Residential land, and a deficit of High Density Residential land. While there is enough acreage for Low Density Residential within the UGB currently to meet the demanded volume of housing units, the consultants explain that "the large amount of land in moderate slopes in Roseburg (64% of the vacant land in Low Density Residential) may inhibit the development of housing affordable to Roseburg's households" (Roseburg HNA, Page 79).

It is difficult to create opportunities for various housing choices on moderate to severely sloped land because of the unique infrastructure challenges and the inability to develop to the same density level as similarly designated flat land. As development moves up slopes to higher and steeper areas, it becomes more challenging to provide infrastructure within the city standards. Prospective developers will have more upfront cost associated with their development, compared to areas within a low elevation and incline. This can be demonstrated with several examples concerning the planning of urban facilities. Municipal water must be provided to all dwelling units within city limits, and many vacant areas with moderate or severe slopes exist above the High Water Pressure Service Elevation. Developers who want to build dwelling units above the service elevation point would have to bear the cost of putting in a water reservoir and pump station to serve their development. The process of bringing sewer systems and roads into steep areas is also more challenging, both logistically and financially. There are also specific standards that apply to individual dwelling units within the Hillside Development Overlay (that includes all areas with slopes higher than 12%), such as requiring geotechnical reports with site review applications that contribute to a developer's upfront cost. These standards are necessary to mitigate hazards associated with steep slopes. It's also generally the case that developers are able to put fewer dwelling units per acre on slopes, so the cost of infrastructure on a per unit basis will be higher as there are fewer units overall to spread the costs among. Overall, the upfront costs combined with inability to develop at a regular density create situations where developers may be limited by what housing options they can offer in order for a project to be financially worthwhile.

There are some cases where the unfavorable topography and prohibitive development costs prevent any level of development to occur. Some such properties within the UGB have remained vacant for more than 40 years. The private property owners involved in this swap approached the City and have cooperated by signing agreements of commitment to participate. The landowners agreed to participate in this swap because they determined that developing the land under the current city standards was not financially feasible. If the UGB swap is successful and the owner's properties are removed from the UGB and city limits (when applicable),

they will have the opportunity to develop them to have a small handful of dwelling units at much lower, rural densities. Review of future development will be done by the County under their own standards. The swap provides mutual benefit for the participating landowners and the City.

There may be some concern as to why this swap will remove 23.05 acres of land designated for medium and high density residential use when the HNA deliberates that there is a tight or short supply of such land types. Shown in the table below, nearly all multiple family residential land going out of the UGB has a slope greater than 25%, which by OAR 660-008-0005(2) is considered a major development constraint. Consistent with guidance in state statute, this medium and high density acreage was not included within the available supply for the 2019 BLI. As a result, its exclusion from the UGB will not result in a buildable land deficit greater than what was already assessed. While these lands were originally designated for higher density development, the ability to practically develop them as such is very unlikely. The probability of land being developed into a specific type of housing isn't based solely on the zoning designation, one must factor in the geography, available facilities, and potential costs. Additionally this area is elevated above the High Water Pressure Service zone, which makes it unable to be serviced by city water without additional, costly infrastructure. In short, based on both the conditions of the land and the meetings the City has held with the property owners, this area is unlikely to be used for multifamily housing. Swapping this small area, along with over 250 acres of low density residential land is determined to be an equivalent tradeoff for the land coming in. The swap will facilitate new opportunities for developers to provide housing options, of different sizes, types, and cost that they would be unable to offer in the currently vacant areas.

Table 26, Land proposed to be withdrawn from the UGB by zoning designation and severity of slope restriction.

Location	Zoning Designation	Slope	Acreage	% Total
Lands Outside City Limits, Within UGB	Suburban Residential (RS)	No Slope Restrictions	1.6	2%
		12% to 25% slope	9.1	13%
		> 25% slope	57.8	84%
	<i>RS Total</i>		68.5	
Lands Within City Limits	Low Density Residential (R10)	No Slope Restrictions	14	7%
		12% to 25% slope	66.5	35%
		> 25% slope	109.5	58%
	<i>R10 Total</i>		190	
	Multiple Family Residential (MR29)	No Slope Restrictions	0	0%
		12% to 25% slope	0.45	3%
		> 25% slope	13.7	97%
	<i>MR29 Total</i>		14.15	
	High Density Multiple Family Residential (MR40)	No Slope Restrictions	0	0%
		12% to 25% slope	0.2	2%
		> 25% slope	8.7	98%
	<i>MR40 Total</i>		8.9	

The HNA Housing Policies and Actions Memorandum specifies within its action items that the City should explore a UGB swap to meet housing goals. Among these includes Policy 1.1a. *“Evaluate swapping constrained residential land within UGB for unconstrained buildable residential land outside UGB.”* Additionally, Policy 4.1.a. calls for continuing action of infrastructure planning: *“Continue to plan for development of infrastructure to support residential development in areas brought into the UGB through a residential land swap.”* The UGB swap is intended to create a wider range of housing development opportunities relative to the current options. Both the proposed removal and exchange areas lack full urban infrastructure, but the mostly flat geography of the lands within the exchange area offer a better chance to maximize financially viable residential development within the UGB.

The UGB swap is only one of many policy actions to be implemented by the City to meet housing goals. On its own, a UGB swap is insufficient to address issues reported in the HNA such as the High Density Residential land deficit or meet the needs of low to very low-income households. Since receiving the final HNA report, the City has worked on a number of other initiatives to encourage infill development that increases the availability and density of housing within the current UGB. These include: an SDC Deferral Program funded through the Diamond Lake Urban Renewal District and a Middle Housing (HB2001) Code Update Project funded by a grant awarded from DLCD. These programs work to adopt provisions to permit multifamily housing in new areas within the UGB and incentivize developers to come to Roseburg to build more housing. The City will combine its effort to increase infill development and density with its effort to expand urban residential development in an orderly, efficient, and timely way through the UGB swap. The collection of these actions will help the City to achieve its housing goals, as identified by the state.

K. GOAL II: PUBLIC FACILITIES AND SERVICES

“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.”

Finding: The Public Facilities and Services Element of the Roseburg Urban Area Comprehensive Plan establishes a policy framework that guides and supports the types and levels of urban services that meet the needs of Roseburg’s urban environment. The City does not have a centralized Facilities Master Plan, but instead has a collection of master plans that are updated each on their own schedule. Among these plans include: Water System Master Plan, Storm Drainage Master Plan, RUSA Collection System Master Plan, and Transportation System Plan. Following the passage of this proposal, it will be necessary to update the appropriate master plans and program needed improvements into the City’s financial plan.

The UGB swap will not immediately require the City to extend public facilities to any property, however it does begin the planning process to do so. The City has evaluated public facilities within the proposed exchange area by hiring consultants to provide technical analysis of existing and needed systems (Sandow Engineering-Transportation Analysis UGB Swap). The City also met with Roseburg Urban Sanitary Authority, the area’s public agency sewer provider, who has retained i.e. Engineering to provide technical analysis to evaluate the impact on the existing system and improvement needed to support the proposed Charted Oaks subarea.

Although the proposed amendment to the UGB line will encompass a significant portion of the Charter Oaks area, only the right-of-way along Troost St. is proposed to be immediately annexed into the city limits as part of this process. Capital improvement projects for facilities will be determined in future stages, following more annexation and development of land. The City publishes a 5-year capital improvement plan that gets reviewed at least every two years to reflect the needs of the community and changes in resources for financing capital projects.

Urban services shall be made available in new areas as properties are annexed into the city limits, with funding typically driven by developers. These projects will be financed through a number of means such as Local Improvement Districts (LIDs), developer dedications, and advanced financing agreements.

a. Water Service

In 1977, the City bought the water system that serves the City of Roseburg as well as Charter Oaks from Oregon Water Corp. The City determined it was financially feasible and in the public interest to turn the formerly private water system into a municipal service. At that time, the existing service area contained all of Roseburg proper (75%) and the remaining 25% served adjacent unincorporated areas. Following the acquisition, the City committed to providing the same level of service for all existing water customers. The following year the City conducted an in-depth evaluation of the 1973 Comprehensive Plan in order to determine its degree of compliance with the new statewide planning goals, put into law via the 1973 Land Use Act. The location of the Urban Growth Boundary had to be evaluated for consistency with LCDC goals, for which the Charter Oaks area was brought under consideration. The City elected to not include the Charter Oaks area within the growth boundary citing concerns about urbanizing land near agricultural areas and finding sewer facility improvements infeasible. A reason for this being that at that time, the sewer system was less extensive and the density of development in the northwest area of the City was much lower than present day. This decision left households in Charter Oaks in a unique situation as many were now using municipal water services while living outside the UGB.

In present day, there are many dwelling units in Charter Oaks still grandfathered into the municipal water service. The main water distribution lines provide over 100 individual water services in the greater Charter Oaks area, including many homes within the proposed exchange area (see Exhibit 91). This is an advantage to the City as it means there is existing infrastructure which will allow for quicker, less costly extension of service to new households. Some existing homes within the proposed exchange area are not currently served by city water, but following the UGB exchange would have the ability to annex and connect to services.

The City's Water System Master Plan adopted in 2010 anticipates future growth in the Charter Oaks area and acknowledges that the water system will need upgrades as development occurs: "The largest future growth in the Main pressure zone is anticipated in the Charter Oaks area on the western border of the UGB, just north of the South Umpqua River. Required fire flows in this area are assumed to be 2,500 gpm in order to serve a proposed school. Construction of additional Main pressure zone storage facilities is recommended to serve this area as it develops" (Water System Master Plan, pg.5-10).

The specific financial avenues for these improvements have yet to be determined, but could include LIDs, Advanced Financing Agreements, or other developer-driven funding sources. All municipal water customers who live outside the city limits pay for their water service, however there is no avenue for the City to gather additional revenue to put towards future capital improvements in the area. Whereas, if these households were inside the city limits, property owners would pay local tax that contributes to infrastructure funding.

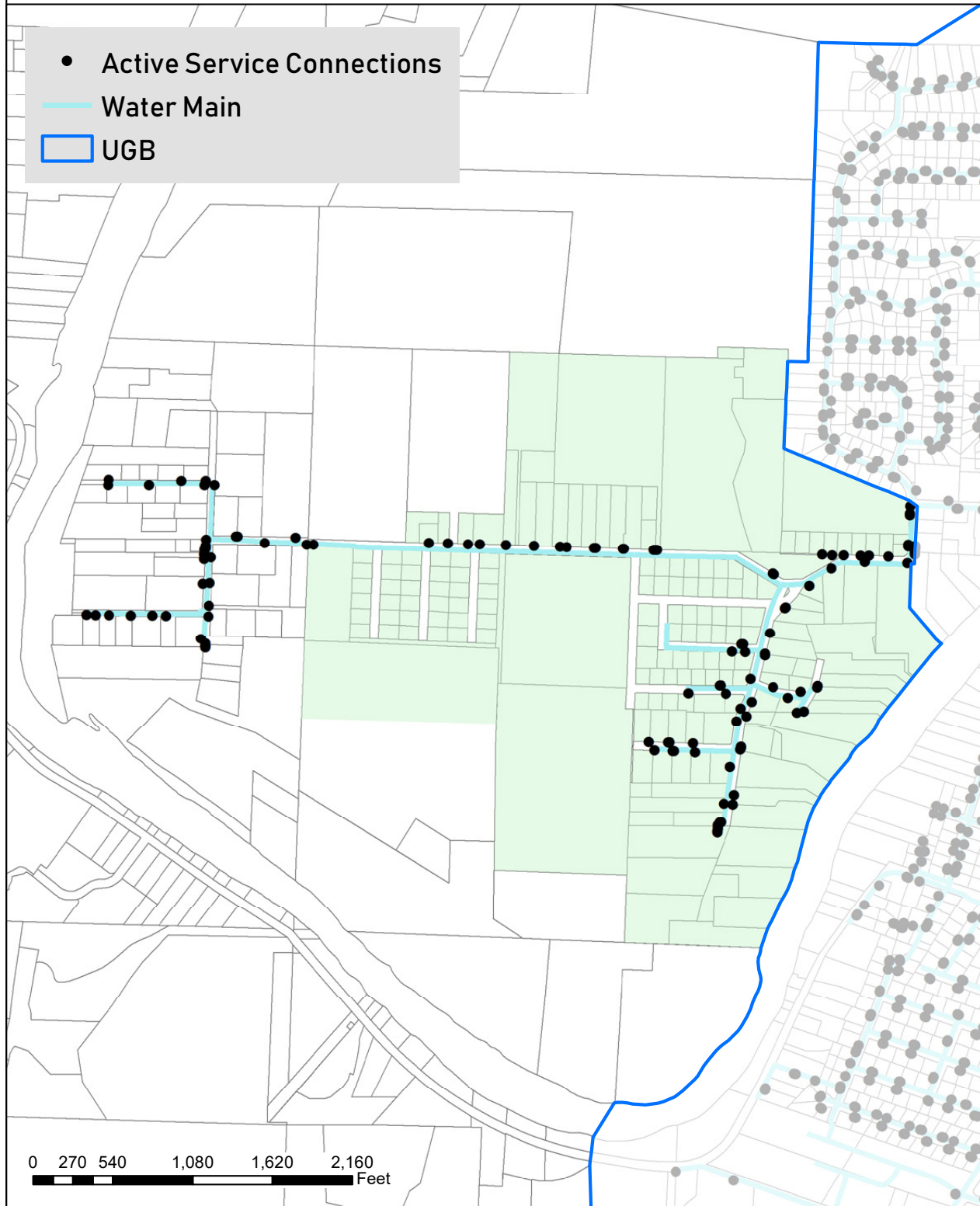
Based on current Comprehensive Plan policies, the City cannot allow any new connections of city water to homes outside the UGB. As a result, all new developments constructed outside the UGB operate on well systems. As part of the citizen engagement process, the city staff has had anecdotal conversations with a number of Charter Oaks residents, who report substandard conditions on their well systems, which can often run dry during the summer months.

This situation creates inconsistency of who in the area is served by city water, and who is not. Bringing the

proposed exchange area into the UGB will allow for property owners to voluntarily annex and request urban water service. This is beneficial in the long-term, as it will open up opportunities for the City to prioritize improvements, provide consistent and standard water services to every property, and better comply with the policies laid out in the Public Facilities & Services and Land Use & Urbanization Elements of the Comprehensive Plan. Extension of the water main to serve each new property will typically be at the cost of the property owners requesting the new services.



City of Roseburg Urban Growth Boundary Exchange Water Service Mains



b. Sanitary Sewer Service

RUSA provides the sanitary sewer service for the City of Roseburg and the area within the UGB. RUSA is a regional sewer authority established in 1983 to meet the sanitary sewer needs of the Roseburg area.

The planning effort to provide sanitary sewer service to the area west of the city limits to meet the potential expansion or exchange of the urban growth boundary dates back more than forty years. The Roseburg Urban Area Wastewater Facilities Plan, Regional Wastewater Treatment Alternatives and Environmental Impact Assessment, prepared by CH₂M HILL in 1975 evaluated three alternative sites for the construction of the new wastewater treatment plant (WWTP). Alternative III proposed constructing a WWTP along Harlan Street. The benefits of this alternative were that it was the most conducive to future expansion, and the ease of serving the area west of the existing city limits.

RUSA completed a feasibility plan in 2018 to reconstruct the Loma Vista Pump Station, which serves the west area of Roseburg, north of the South Umpqua River. The findings of the study recommended moving the existing pump station south to a location near Troost Street just past Agape Court. This location was chosen to enable the existing property along Troost Street within the current urban growth boundary to be served with a gravity sewer and provide adequate property size to meet the current pump station standards.

The new location for the Loma Vista Pump Station will also provide the opportunity to extend sewer service to a portion of the proposed exchange area. RUSA evaluated the remainder of the area included in the proposed new UGB boundary. It was determined that a new pump station would be required located near Felt Street adjacent to the South Umpqua River (see Exhibits 92 & 93).

No sewer services currently exist in the proposed exchange area, where homes now are served by individual on-site septic systems. Extension of the sewer main to serve property will be at the cost of the property owner(s) requesting the new service(s). Financing options for public improvements could also include the creation of LIDs or Advanced Financing Agreements.

LOMA VISTA LIFT STATION PRELIMINARY LAYOUT

EXHIBIT #1 - UPDATED 2018-11-07

LOMA VISTA LIFE STATION SERVICE AREA A = ~80+ ACRES

PROPOSED LIFT STATION
BLUE FLOOD ELEVATION: 437.5'
FLOW LINE: 422.5'

EXISTING LIFT STATION
270615AC00106
R15065

APPROXIMATE SERVICE BOUNDARY

EXPANSION AREA

STREETS: FELT STREET, CLOAKE STREET, WHICKORY STREET, W. BERDINE STREET, W. SUSAN STREET, W. CARROLL COURT, W. SHARP AVENUE, W. BODIE STREET, W. GREEN STREET, RIVERVIEW DRIVE, W. MOOSE DRIVE, W. HAZEL STREET, W. SEWARD STREET, W. ELM STREET, W. SHERMAN AVENUE, W. OLIVER STREET.

SCALE: 1" = 200'

NORTH ARROW

PROJECT NO. 151-18
DWG. NO. 151-18

DATE: 11/07/2018

BY: [Signature]

CHECKED BY: [Signature]

DESIGNED BY: [Signature]

ENGINEER: [Signature]

PLANNING & DESIGN GROUP, INC.

151-18

Exhibit 93, Subarea #11 (Dixonville) Farm & Forest Parcel Size Compatibility Map



c. Stormwater

Currently, no storm collection system exists to serve the proposed exchange area in Charter Oaks. Storm drainage flows in open channels, roadside ditches and through culverts to the South Umpqua River. The City has a storm drainage utility that would work to provide service to areas that will be gradually annexed. The City contracted with an engineering firm to provide a feasibility analysis of the proposed exchange area to determine what, if any areas that may be eventually annexed into the city will have potential stormwater drainage concerns. The full report can be found in **Appendix 4**. The firm analyzed the topography of the proposed exchange area and determined the direction of storm runoff. They identified locations to add discharge piping and storm trunk lines that could discharge to the South Umpqua River. The analysis determined that a storm sewer system could be designed and constructed to service the entire area without requiring unusually deep storm pipes or structures, or requiring pumps. This supports the idea that addition of new systems will be economically favorable as more development occurs.

d. Fire Protection & Police Services

Fire protection within the UGB is provided by the Roseburg Fire Department and Douglas County Fire District No. 2. The City department generally limits its protection service to within the city limits while the Douglas County Fire District provides service to the unincorporated area outside city limits but within the UGB. The City of Roseburg and Fire District #2 have a long-standing mutual aid agreement between them. The agreement provides that, upon request, the district will provide assistance to the City Fire Department and the City will assist the district. City ordinance prohibits the Fire Department from leaving the city limits to fight fire except on a mutual aid call.

Following the UGB swap, the Fire District #2 will continue to provide fire protection service to the proposed exchange area. Additionally, the Fire District #2 will extend its services to the exiting Atkinson and Serafin properties as they will no longer sit within the city limits or UGB. The Roseburg Urban Area Comprehensive Plan has provisions for the exchange of fire protection territory between the City and County as a result of annexation. Following future annexation of residential areas in Charter Oaks, Roseburg Fire Department will take over fire protection service.

Police services are provided by the Roseburg City Police Department within the city limits and the Douglas County Sheriff Department provides law enforcement services to the unincorporated urban area. The Police Department has a mutual aid agreement with the county, and coordination between the two agencies occurs to ensure that public safety is provided.

The City Fire Chief and Police Chief have both indicated that following the adoption of the UGB swap and future annexations, their departments foresee no issues providing the same level of service to the exchange area, as it would with other neighborhoods. Properties in the exchange area will be gradually annexed into the city limits, which gives both departments the chance to monitor growing needs and evaluate their ability to provide service over time.

e. Roads

The City contracted Sandow Engineering in 2021 to conduct a traffic impact study for the areas affected by the UGB swap and provide recommendations for street improvements and changes (see **Appendix 5**). In general, the future street network in the Exchange Area will be developed as the parcels are developed. The study anticipates an increase in traffic and trip counts along some major routes that will need to be addressed as

the exchange area is built out. Additional information for the study can be found in Goal 12: Transportation.

Troost Street will serve as the main route to/from the UGB exchange area to the greater Roseburg area. The section of Troost St within the UGB is classified as a Major Collector, while the section outside the UGB has a County Classification of Minor Collector. The existing UGB is located east of the intersection between Troost St and Loma Vista Drive. Troost St has one lane of traffic in both directions. There are no sidewalks, bike lanes, planter strips, or street lighting along Troost St on the section outside of the UGB (also including a short section within the UGB east of Katie Dr). The posted speed limit along all of Troost St is 25 miles per hour.

The study recommends that the section of Troost St within the proposed exchange area be reclassified from Minor Collector to Major Collector, consistent with the classification of the section within the UGB. The City plans to annex the right-of-way along Troost St into the City limits concurrently with the UGB swap, at which point the City can plan improvements based on the Transportation Systems Plan. The Roseburg TSP provides design recommendations for different road classifications which can be used as a guide for future improvements. Other roads will be developed to city standards as they are annexed into the city limits.

L. GOAL 12:TRANSPORTATION

“To maintain and improve the quality of the air, water and land resources of the state.”

Finding: To comply with Goal 12, the City contracted Sandow Engineering to evaluate impacts of the proposed UGB swap on existing, planned, and future transportation facilities identified in the Roseburg Transportation System Plan and Douglas County Transportation System Plan. The study, which can be found in its entirety in

Appendix 5, determined that the forecasted growth can be accommodated and maintain an acceptable level of service standard with some mitigation. The evaluation considers transportation impacts from the lands to be added within the UGB. The analysis included the adjacent roadway network in order to be consistent with OAR 660-12-0060 Transportation Planning Rule (TPR) requirements. The main route within the UGB exchange area, major connectors and arterials within the UGB, and the nearest I-5 Exit Interchanges were all examined. The study borrowed traffic counts from the Roseburg TSP (updated in 2019) or collected new counts for intersections not included in the TSP in 2021.

Troost Street is the main route that runs through the UGB exchange area and connects to the greater Roseburg area. The existing UGB boundary is located just to the east of the intersection of Troost and Loma Vista Dr. The section of Troost St within the UGB is classified as a Major Collector, while the section currently outside of the UGB is classified as a Minor Collector. Based on a count conducted by Douglas County in 2017, the section Troost St outside of the UGB has 609 average daily trips. The Roseburg TSP states that if the forecast volume of a local road exceeds 1,200 vehicles per day, then it shall be designed as a collector route.

Where it stands now, Troost St outside of the UGB sits well below the threshold for reclassification. However, the traffic impact study projects that at maximum residential build out of the exchange area, the average daily trip count for Troost could exceed the typical range for a Minor Collector. As a result, the consultant recommended that all sections of Troost St be classified as a Major Collector. This would provide a consistency along the route and allow for the City to plan for future growth. Following the UGB swap and annexation of Troost St, the City will monitor growth within the area and update the classification when it is warranted.

Street safety and connectivity are also factors of consideration. The traffic impact study provided recommendations to improve the safety of Troost St that can be reasonably adopted, such as lowering the

roadway speed of the newly added sections. Connectivity is also a concern, the only direct access from the exchange area to adjacent land within the UGB is via Troost St. However, both City and County TSPs have identified future planned connections. Two routes are marked as “Tier 2: Needed but Unfunded Projects” in the Roseburg TSP. The first is a connection between Troost St and Garden Valley Boulevard, which would provide access from the north. The second is a connection between Charter Oaks Drive and Harvard Avenue, which would provide access from the south and would require construction of a bridge across the South Umpqua River. Tier 2 projects are conceptual, meaning the TSP encourages the City to consider these projects should additional funding become available.

The traffic impact study also concluded that some intersections within the transportation network will need improvements to meet the City’s performance standards by 2040, accounting for projected maximum growth. The report includes recommended action for improvements. Common improvements include adding new turn lanes or adjusting traffic signal patterns, the recommendations are relatively low cost in general. In some cases, the UGB swap was not shown to have a significant enough effect to trigger mitigation. Notably, the intersections at the I-5 Exit 125 northbound and southbound ramps were projected to operate within acceptable standards through 2040 as per ODOT’s Oregon Highway Plan without mitigation.

M. GOAL 13: ENERGY CONSERVATION

“To conserve energy.”

Finding: Goal 13 requires that land uses shall be managed and controlled so as to maximize the conservation of all forms of energy, based upon sound economic principles. Energy consequences were considered in the evaluation of the study area. The preferred exchange area is contiguous to other residential land within the UGB and has existing roads which connect it to the urban area. The location of the site places it in the southeast of the greater urban growth area, generally closer to the urban core than alternate locations within the study area. Goal 13 calls for land use planning that utilizes increasing density gradients along high capacity transportation corridors to achieve greater energy efficiency. As there is lower connectivity from the proposed exchange area to such corridors in Roseburg, it is reasonable to designate such land as low density residential. Street connectivity can be increased by development-driven improvements to maximize transportation efficiency and minimize the depletion of non-renewable energy. The Transportation Systems Plan includes proposed routes that would create new connections from the exchange area to major collectors, such as Garden Valley Blvd.

Other pre-existing public facilities (such as water), flat topography, and a general existing pattern for residential development factor into the overall energy efficiency of the UGB swap. Expansion of development to other areas without existing public services would have greater negative energy consequences.

There are no inventoried sources of energy in areas affected by the UGB swap, according to the Douglas County Comprehensive Plan and the Roseburg Urban Area Comprehensive Plan. Consequently there are no impacts to energy resources within the proposed UGB.

N. GOAL 14: URBANIZATION

“To provide for an orderly and efficient transition from rural to urban land use, to accommodate urban population and urban employment inside urban growth boundaries, to ensure efficient use of land, and to provide for livable communities.”

Finding: The process of a UGB land exchange is in itself a process that carries out Goal 14, through following procedures pursuant to OAR 660-024. With the concurrent UGB exchange, the state will have acknowledged the lands within Roseburg being in compliance with Goal 14.

O. GOALS 15 - 19

Statewide Goal 15 (Willamette River Greenway), Goal 16 (Estuarine Resources), Goal 17 (Coastal Shorelands), Goal 18 (Beaches and Dunes), and Goal 19 (Ocean Resources) are not applicable to the proposal per OAR 660-024-0020(1)(e-g).

4. CONSISTENCY WITH THE ROSEBURG URBAN AREA COMPREHENSIVE PLAN POLICIES

A. CITIZEN INVOLVEMENT ELEMENT

“Active, ongoing and meaningful citizen involvement is an essential ingredient to the development and implementation of any successful planning program.”

The Citizen Involvement Element of the Roseburg Urban Area Comprehensive Plan borrows heavily from the statewide planning goals. The objective of the Roseburg Citizen Involvement Program is “to ensure that the citizens of the Roseburg urban area have an opportunity to be involved in all phases of the planning process.” The program incorporates the 6 elements stipulated in OAR 660-015-0000(1): Citizen Involvement, Communication, Citizen Influence, Technical Information, Feedback Mechanisms, and Financial Support. The element also specifies the responsibility of the Planning Commission and City Council to host public hearings and consider public input received through citizen involvement.

There are no specific policies listed for the Citizen Involvement Element.

Finding: The City of Roseburg’s Comprehensive Plan Citizen Involvement Element mirrors Statewide Planning Goal 1: Citizen Involvement. The proposal is tied to a decision making process that gives opportunity for the public to provide input, in accordance with state and city requirements. The proposed amendment is consistent with Goal 1 and the Citizen Involvement Comprehensive Plan Element.

B. POPULATION ELEMENT

“To accommodate Roseburg’s anticipated population growth through the orderly provision of essential facilities and services while promoting wise and efficient land use.”

The Population Element has 4 policies. The following policies are applicable to the requested amendment:

Population Policy #2: *Concepts of urban development for cost effectiveness and energy efficiency will be supported.*

Finding: The proposal satisfies Policy 2. The UGB exchange is an action which enables urban development by swapping geographically constrained land with urbanizable land that has existing public facilities and infrastructure to accommodate housing needs in an efficient and cost effective manner. Further reference to this can be found in the Goal 10: Housing, the Goal 11: Public Facilities and Services, and Goal 13: Energy Conservation sections of this proposal.

Population Policy #3: *All elements of the Roseburg Urban Area Comprehensive Plan shall be coordinated with the mid-range year 2000 population projection of 44,329 persons. Yearly population changes or trends will be monitored and assessed for their impacts. Prior to any amendment of the Comprehensive Plan, these changes or trends shall be considered.*

Finding: An alteration to the UGB will require an amendment to the Comprehensive Plan Land Use Map. The most current and accurate population changes, projections, and trends have been considered in preparation for this proposed amendment. Data from the Population Research Center at Portland State University projects that the population within the Roseburg UGB will grow from 23,939 (PSU 2022 UGB Pop. Forecast), to 33,708 by 2045. The 14-Year Population Forecast (2022-2036) for the Roseburg UGB is projected to have an average annual growth rate of approximately 3%. Considering the findings of the population forecast, it's concluded that an outright UGB expansion is not presently needed per the requirements of OAR 660-038. As a result, a UGB lands exchange is proposed instead.

C. NATURAL RESOURCES ELEMENT

“Goal 1. Provide a healthy and attractive environment for the urban area population.

Goal 2. Maintain the benefits associated with environmental resources in an urban setting. Those resources include the land, clean air and water, tolerable noise levels, aggregate resources, wildlife and wildlife habitat, and vegetation. Recommendations directed toward these resources may differ depending upon whether they are located on urban, rural or urbanizable lands.”

The Natural Resources Element 18 policies. The following policies are applicable to the requested amendment:

Natural Resource Policy #6: *The City and County shall jointly develop and adopt ordinances and programs which carefully manage development on hillsides and in water bodies in order to protect scenic quality, water quality, vegetation and wildlife values of those areas.*

Natural Resource Policy #7: *Development practices should avoid grading plans that expose unprotected surfaces from water flows and possible erosion.*

Natural Resource Policy #8: *Land form alterations proposed in areas with the following conditions should show that design and construction techniques eliminate public harm, public costs, and adverse effects to surrounding properties:*

- Slopes exceeding 13 percent;*
- Severe soil erosion potential;*
- Land subject to slumping or sliding.*

Natural Resource Policy #9: *Land related hazards such as erosion or soil exhibiting poor foundation potential should not necessitate disapproval of development.*

Findings NRP #6, 7, 8, 9: The majority of the Charter Oakes Study Area is flat, however there are select areas with a slope greater than 12%, that totals 96 acres, or 19% of the subarea. Following the UGB swap, future annexation of this area into the city limits can occur. Areas with steep slopes will be placed under the City's Hillside Development Overlay. All development within the overlay will be regulated according to the

standards found in Roseburg Municipal Code 12.04.100 to ensure public health, safety, and general welfare. The associated codes address potential risks that can result from steep slopes, erosion, and landslides.

All developments that disturb more than one (1) acre of land through grading, excavating, etc. require a 1200-C NPDES General Permit, administered by the Department of Environmental Quality. This permit requires an Erosion and Sediment Control Plan as part of the construction work. Future development will comply with current city and state standards.

Natural Resources Policy #11: *The South and North Umpqua Rivers, Newton Creek and Deer Creek are major waterways that are scenic, recreational and natural resources of the community. They are, however, to be protected, preserved and maintained for their primary function as drainage courses first. Any measures taken to sustain their primary function shall minimize adverse impacts on scenic, recreational and natural values.*

Natural Resources Policy #12: *Natural drainage courses, including major waterways, shall be regulated to control alteration, excavation, filling, realignment, clearing and all other actions that could affect their function or natural resource value.*

Natural Resources Policy #13: *The development of uses relating to the rivers for public recreation and scenic enjoyment should be encouraged.*

Natural Resources Policy #14: *Mature ground cover and trees, wildlife habitats and the natural contours of identified significant stream banks shall be preserved. This shall be accomplished with a setback of structural and any other physical development such as parking lots, retaining walls, channel alterations, etc. from identified stream banks unless findings are made, after consultation with the Oregon Department of Fish and Wildlife, that any such activity:*

- a. Will not have a significant adverse effect on stream bank erosion, water temperature and quality, or wildlife; or*
- b. Is required for flood control and actions are taken to mitigate such impacts as much as is possible; or,*
- c. Is not required for flood control and will include all actions as are necessary to prevent or sufficiently mitigate any significant immediate or potential stream bank erosion, adverse effect on water temperature and quality, or wildlife.*

Findings NRP #11, 12, 13, 14: RMC 12.06.030(B)(c) states that excavation, fill placement, or removal of trees or ground cover shall require a permit from the Community Development Department if the property contains all or portions of a river, stream, wetland, spring, or other source where the continuous presence of water is indicated and which would be disturbed. This code shall apply to any future annexed lands entering the city limits.

Lands adjacent to the South Umpqua River in the proposed exchange area currently fall under Douglas County's Riparian Vegetation Corridor. The City of Roseburg has a similar regulatory overlay known as the Riparian Habitat Protection Overlay, detailed in RMC 12.04.130. The overlay works to protect the natural value of the river by enforcing special development regulations. A 50-foot setback from the top of the river bank for all structures is required for land located within the overlay. This serves to protect the riparian vegetation, wildlife habitats, and the integrity of the river banks. Exceptions to the riparian setback are only made based upon the advice of the ODFW.

The recreational value of the river will not be impacted by the UGB swap. The area on the South Umpqua River bank to be brought into the UGB is privately owned and there are no current plans to create a public recreation site. The river can be publicly accessed upstream at nearby Stewart Park. However, adding this area into the UGB does open up more locations for a future expansion of recreational facilities in west Roseburg. Acquiring land for a community park west of Hucrest Elementary is identified as a priority in the Comprehensive Parks Master Plan.

Similarly, the UGB swap is not expected to impact the scenic value of the river as the city and county have similar setback requirements, which generally work to preserve the natural aesthetic quality of the bank.

Natural Resources Policy #15: *Significant wildlife habitats shall be identified and managed in accordance with state wildlife management practices.*

Finding NRP #15: No significant wildlife populations exist within the proposed UGB. The County and State will continue to have responsibility over the wildlife management practices in the surrounding area outside the UGB, including the Blue Heron Habitat Protection Overlay referenced in the statewide goals section.

D. ECONOMIC ELEMENT

“To broaden, improve and diversify the economy of the Roseburg urban area while enhancing the environment”

The Economic Element has 10 policies. The following policy is applicable to the requested amendment:

Economic Policy #1: *The City of Roseburg shall encourage economic growth by demonstrating a positive interest in existing and new industries, especially those providing above-average wage and salary levels, an increased variety of job opportunities, a rise in the standard of living, and utilization of the resident labor force.*

Finding: The primary focus of the UGB swap is to increase housing development opportunities within the Roseburg urban area, which is connected to the economic wellbeing of the community. Providing a pathway for new urban residential development supports the resident workforce in all local industries by meeting the housing demand projected in the HNA.

E. TRANSPORTATION ELEMENT

Note: CITY ORDINANCE NO. 3249, adopted December 11th 2006 amended the Comprehensive Plan, replacing the existing Transportation Element with the Roseburg Transportation System Plan. The Transportation System Plan was updated in 2019 and adopted by the City Council on February 10, 2020.

The Transportation System Plan has 5 goals and 29 policies. The applicable goals and policies are addressed below:

“Goal 1. Provide a comfortable, reliable, and accessible transportation system that ensures safety and mobility for all members of the community.”

Transportation Policy #1: *Provide mobility and accessibility for all transportation modes where feasible while continuing to preserve the intended function of existing transportation assets.*

Finding: The proposal satisfies this policy as it provides land for urban use that can be feasibly developed for future urban use, including the provision of new transportation modes as demand is assessed and needed, while also using the existing road system for its intended use.

Transportation Policy #4: *Improve pedestrian and bicycle circulation within and between neighborhoods and commercial centers.*

Finding: The proposed UGB amendment does not interfere, or otherwise adversely affect the City's current or future goals related to the improvement of pedestrian and bicycle circulation. Following annexation, lands proposed for inclusion in the UGB will be subject to all public improvement requirements provided in RMC 12.06.020, which includes developer requirements for the provision of pedestrian sidewalks.

Transportation Policy #5: *Coordinate with law enforcement and emergency response agencies in the planning and design of transportation facilities and emergency response operations.*

Finding: The City coordinates with the Fire Chief to ensure that all developments shall provide adequate access for emergency service vehicles, pursuant to RMC 12.06.030. All site development standards will apply to lands within the exchange area as they are annexed.

Transportation Policy #6: *Enhance safety by prioritizing and mitigating high collision locations within Roseburg.*

Finding: The traffic impact study conducted by Sandow Engineering on behalf of the City includes a safety and operational evaluation of Troost Street between Felt Street and Katie Drive to determine the improvements to mitigate crash risk. An analysis of crash data provided by ODOT showed that there were no reported crashes within the last 6 years. Portions of Troost St have significant curvature, which is a cause for concern at some intersections. The traffic impact study provides specific transportation recommendations to improve safety, such as lowering the speed limit, to mitigate concern associated with forecast growth.

"Goal 2. Create an integrated multimodal transportation system that enhances community livability."

Transportation Policy #7: *Coordinate transportation and land use decision-making to maximize the effectiveness of Roseburg's transportation system.*

Finding: During the analysis of the study area, the orderly provision of facilities and services including the transportation system, was heavily considered. Of all the alternatives analyzed, the preferred Charter Oaks subarea (proposed exchange area) provides the most orderly and economic provision of public roads.

"Goal 3. Provide for a multimodal transportation system that enhances connectivity."

Transportation Policy #15: *Continue to develop a multimodal transportation system that integrates all modes and addresses system gaps or deficiencies.*

Finding: It is acknowledged that the UGB swap may lead to the creation of new system gaps in earlier stages of development. Following the adoption of the new boundary, annexation and new development will occur gradually. New development may lead to localized street improvements that may not connect all the way through the route, such as the addition of sidewalks. The City will work to address gaps over time by facilitating developer driven improvement, LIDs, and capital improvement planning.

Transportation Policy #16: *As development occurs, maintain a network of arterials, collectors, local streets, and paths that are interconnected, appropriately spaced, and reasonably direct.*

Finding: The proposed exchange area has a basic network of local streets which connect to Troost St, a county classified collector. Existing roads will be transferred from County to the City jurisdiction at the time of annexation. Additions to the street network will occur with development, under the standards of the RMC Land Use and Development Ordinance. The TSP contains a Functional Classification Plan which helps maintain an organized street network and a Street Connectivity Plan which proposes future routes to improve connectivity around constraints of rivers, highways, and topography. The Street Connectivity Plan already notes two proposed “Planned Connections” that could add additional routes to and from the new area.

F. ENERGY CONSERVATION ELEMENT

“To maximize the conservation and efficient utilization of both Renewable and non-renewable energy within the framework of sound land use and economic principles.”

The Energy Conservation Element has 8 policies. The following policies are applicable to the requested amendment:

Energy Conservation Policy #4: *As an energy conservation measure, the City will encourage the infilling of vacant land.*

Finding: The proposed UGB amendment does not hinder or otherwise interfere with the City’s current or future actions to encourage the infilling of vacant land. The 2019 Housing Needs Analysis Policies and Actions Memorandum identifies multiple policies, including the UGB swap and code amendments to lower or eliminate barriers to infill development, as actions that can be carried out concurrently.

G. PARKS AND RECREATION ELEMENT

“To provide a timely, orderly and efficient arrangement of park and recreation facilities and services which will satisfy the diverse needs of urban area residents and visitors.”

The Parks and Recreation Element has 7 policies. The following policy is applicable to the requested amendment:

Parks and Recreation Policy #3: *The City shall continue to encourage and facilitate cooperation and coordination with other appropriate agencies regarding the planning acquisition, development and use of parks and recreation facilities.*

Finding: The Comprehensive Parks Master Plan states that the City and the Roseburg School District #4 should work in partnership to develop school park sites that serve both the school and community under a joint use agreement. It is anticipated that the City will continue to coordinate with the School District to develop future recreation opportunities in the proposed exchange area. The currently vacant property owned by the School District in the area (SP-6) which sits adjacent to Troost Street can be annexed in the future as a possible school site with ancillary recreational amenities to meet the needs of the growing community, as proposed in the Parks Master Plan.

H. HISTORIC PRESERVATION ELEMENT

“To identify, preserve and protect historic and cultural resources of the Roseburg urban area.”

Finding: The proposal does not affect any inventoried historic or cultural resources. The City finds all policies within this element not applicable to the requested amendment.

I. PUBLIC FACILITIES AND SERVICES ELEMENT

“To provide a timely, orderly, and efficient arrangement of public facilities and services to serve as a framework for community development.”

The Public Facilities and Services Element has 16 policies. The following policies are applicable to the requested amendment:

Public Facilities and Services Policy #2: *In addition to the physical, economic, energy and social considerations addressed by other policies in this Plan, the timing and location of urban development within the urban area shall be based upon the current or imminent availability of urban services; particularly public sewer and water.*

Finding: There are some urban services currently or imminently available in the proposed exchange area which make it a comparatively better location for urban development. Public water service is already available to a number of properties in Charter Oaks and could be extended to new developments. Public sewer is not currently available to properties, however planning by the City and RUSA will continue with the goal of extending sewer services to serve new development. A collector road runs through the exchange area and a local road system has already begun to develop in the rural residential areas. The City’s traffic impact study for the UGB exchange area evaluates the road system safety and capacity and provides recommendations for improvement as development occurs.

Other options for future urban development, such as the proposed withdrawal areas, lack any water, sewer, or road systems. In the Study Area analysis section, other areas outside the UGB are evaluated and the pros and cons of urban service availability is weighed. Ultimately, the selected exchange area is the most optimal pick. The conditions satisfy Policy #2.

Public Facilities and Services Policy #3: *In those portions of the urban area where the full range of urban services is not available, capital improvement programming for that area will be developed prior to extension of services intended to facilitate further development of that area.*

Finding: The City of Roseburg has a Capital Improvement Plan (CIP) for 2021-2026 which plans for the financing of projects identified to need significant capital investment. The City reviews and updates the CIP at least every two years to reflect the developing needs of the community. Following the UGB swap, there is only an immediate plan to annex Troost St. into the city limits. Major capital improvements to the proposed exchange area will only occur following significant annexation of other properties into the city limits. As the area develops, potential improvement projects will be identified. The CIP will be updated in future rounds to plan for the developing need for services within the new urban area.

Public Facilities and Services Policy #5: *The City shall not extend water service beyond the urban growth boundary. Extension of city water service to property outside the City limits may only be made upon agreement*

to annex such property to the corporate City limits at such time as allowed by State Statute.

Finding: The City of Roseburg acquired the water system that serves the City as well as multiple unincorporated areas including Charter Oaks in 1977, prior to the adoption of the Comprehensive Plan. As such, areas outside the UGB are serviced by municipal water and were effectively grandfathered into the urban system. The UGB swap can allow for the eventual annexation of some of these customers into the City. Future extension of the water main to serve properties not already being serviced will require annexation if the property is contiguous to the city limits, or will require consent to annexation in the future if the property is not contiguous.

Public Facilities and Services Policy #10: *The availability of adequate sewer service, both in terms of collection and treatment capacity, shall be a precondition to a development project.*

Finding: The City coordinates with RUSA to plan for the future extension of sewer into the proposed exchange area. Properties will come into the city limits gradually, first through voluntary annexation requested by landowners adjacent to Troost St. Future development patterns in the area may create island annexation scenarios later on. Developments will be approved on the condition that sewer service is funded by the developers or other funding streams previously mentioned.

Public Facilities and Services Policy #11: *Sanitary sewer service shall not be extended outside the urban growth boundary. Extension of city sewer service to property outside the City limits may only be made upon agreement to annex such property to the corporate City limits at such time as allowed by state statute.*

Finding: Currently, no sewer services extend outside the UGB. However RUSA will allow properties within the UGB but outside of the City limits to be connected to services, and they do not regulate the consent to annex process. This policy was written prior to the establishment of RUSA as a special district operating under ORS 450 in 1983. Prior to this, the City and other sanitary districts had jurisdiction over the wastewater collection and treatment system. Since this time, the City has entered into new agreements with RUSA which allow RUSA to act as the sole provider for sewer services within the UGB.

Property owners in the Charter Oaks area currently use septic systems. Following the UGB swap, existing dwelling units can remain on septic systems until such a time the system fails and public sewer is available within 300 feet of a property. If public sewer service is not available, a septic system may serve the property, pursuant to OAR 340-071-0160. Currently, RUSA is working on a relocation project for the Loma Vista lift station, which would provide sewer capacity for portions of the Troost/Charter Oaks Area. Extension of the sewer main to serve properties will be at the cost of the property owners requesting the new services.

The areas exiting the UGB are vacant and do not have any sanitary sewer services, therefore this policy would not affect their withdrawal. All future development in the withdrawn areas will use septic systems subject to approval by Douglas County.

Public Facilities and Services Policy #12: *The City shall work closely with Douglas County, the Special Districts and other public agencies to develop a wastewater facilities plan to provide for the timely, orderly and efficient arrangement of sanitary sewer service to meet the projected needs of the urban area to the year 2000. The facilities plan shall contain a workable strategy for financing new collection, transmission and treatment facilities.*

Finding: The Wastewater Collection System Master Plan was developed by RUSA in 2003 to provide a flexible master plan for logical expansion, repair, and maintenance of the Roseburg area sewage collection system.

RUSA's study area to develop population data for the master plan included areas within the present Roseburg Urban Growth Boundary and projected growth areas, including "the area west of the present UGB boundary." The master plan provides RUSA with a plan to guide the future expansion of its wastewater collection system to meet the needs of the people of Roseburg through the next 50 years (2055).

Public Facilities and Services Policy #14: *In order to provide the best possible service to the community, the Fire Department and Police Department shall periodically make a conscientious and studied evaluation of the department's operations and facility needs, with particular attention paid to new demands caused by urban growth, state directives and local inter-agency cooperative agreements. A written evaluation shall be prepared for the City Manager, who in turn may call attention to specific items for consideration by the City Council, Planning Commission or staff.*

Finding: The Fire Department and Police Department are in constant coordination with the City Manager and administrative staff to ensure adequate levels of service in the Roseburg area. This will continue after the proposal takes effect, and the new urban area will be accounted for in departmental evaluations of service.

Public Facilities and Services Policy #15: *The City shall encourage and help facilitate the unification and consolidation of urban services within the Urban Growth Boundary.*

Finding: All planned extension of urban services will only occur within the UGB, or within the city limits when other policies apply. The UGB swap will facilitate future residential growth in an area with preexisting urban water service, which encourages a logical development and extension of other urban services and facilities.

Public Facilities and Services Policy #16: *The City shall strive to improve the level of cooperation with all agencies of local, state and federal government in order to ensure the timely, orderly and efficient provision of all public facilities and services essential to the social, economic and physical well-being of the urban area and its citizens.*

Finding: While preparing for this application, the City has communicated with local and state agencies about the future provision of public facilities that would follow the UGB swap. Interdepartmental meetings and coordination between Community Development, Public Works, Fire and Police Departments occur regularly. The City has also had big picture discussions with Douglas County Planning Department staff and DLCD staff to assess if the proposed area is an appropriate location for urban level services. The City also coordinated with Douglas County Public Works and ODOT to conduct the traffic impact study for the UGB exchange area. The City worked with Douglas County Public Works to gather traffic data necessary for the study. ODOT engineers conducted technical reviews and provided comments for Sandow Engineering, the firm contracted by the City to conduct the study, to ensure it met the state's standards.

J. HOUSING ELEMENT

"To ensure the opportunity for, and the provision of, safe, affordable housing in sufficient numbers, types, size and locations to meet the needs of all citizens in the Roseburg urban area."

The Housing Element has 14 policies. The following policies are applicable to the requested amendment:

Housing Policy #1: *New residential development shall be coordinated with the provision of an adequate level of services and facilities.*

Finding: The Roseburg Housing Needs Analysis Policies and Actions Memorandum calls for the City to continue to plan for the development of infrastructure to support current and future residential developments brought into the UGB through the swap. Specific information on planning for services and facilities can be found in the Public Facilities and Services section.

Housing Policy #2: *Residential land use designations specified in the Comprehensive Plan within the City limits shall be zoned in accordance with such designation. Residential land use designations outside the City limits shall be implemented in the manner prescribed by an Urban Growth Management Agreement jointly adopted by Douglas County and the City of Roseburg.*

Finding: The UGMA establishes the Charter Oaks Area as “an Area of Mutual Interest outside the UGB for the purpose of establishing a process for the provision of urban services and future urbanization.” The proposed exchange area currently sits outside both the City limits and the UGB, but within the Area of Mutual Interest (see **Appendix 1**). There is a coordination of activities between the County and City concerning the area, however it is not currently subject to other formal policies within the UGMA or Comprehensive Plan. In concurrence with UGB exchange, the UGMA shall be updated and jointly agreed upon by the City and County. A proposed amendment to the UGMA is included in this report to ensure a smooth transition of responsibilities for the area’s urbanization. The City proposes to designate the exchange area as part of Jurisdictional Subarea #2 within the UGB, which falls under the County’s land use jurisdiction. The City shall apply a City of Roseburg Comprehensive Plan land use designation to the areas, but all properties shall retain County zoning until they are annexed into the city limits. The proposed county zoning will be compatible with the City Comprehensive Plan designation.

The areas exiting the UGB will no longer have City Comprehensive Plan Designations or City zoning and will not fall under the UGMA. The City proposes new zoning designations for the exiting areas that will be reviewed by the Douglas County Planning Commission and County Board of Commissioners for approval during the legislative process.

Housing Policy #3: *The City and County shall ensure an adequate supply of land suitable for development which is zoned for low, medium and high density residential uses. Determination of an adequate supply shall be based on two to three years projections of demand. The City and County shall annually monitor and analyze population projections and projected housing demand to provide a reliable basis for land use decisions and to assure sufficient residential land to maintain a balance between supply and demand.*

Finding: The City contracted consulting firm ECONorthwest to conduct a Housing Needs Analysis in 2019, in order to inventory the buildable land, project future availability and needs, and identify policies to meet Roseburg housing goals. The findings of the HNA identified that in an optimistic scenario, there is enough low density residential land within the UGB to meet the housing demand for 2019-2039. However it follows that “if no partially vacant Low Density land develops and land on slopes develop at a slower pace or at lower densities, Roseburg may have insufficient land for Low Density development” (HNA pg. 80). The UGB swap will ensure a new supply of vacant, flat, and unconstrained land that will allow developers options for development and be suitable for residential use.

The UGB swap does not ensure an increase in medium and high density residential land supply or development, but it also does not hinder other policy actions to do so. The Roseburg Housing Policies and Actions memorandum of the HNA recommends seven other policies to implement within the next 5 years to improve land availability within the UGB. Some of these include: identify lower density land that could be redesignated as higher density (1.1b & 1.1c), identify vacant land with existing urban services and work with landowners

to make land development-ready (1.3a), and lower or eliminate barriers to infill development through code amendments (1.3b).

The City continues its efforts to ensure an adequate range of residential uses by adopting code amendments separate from this proposal. The City has already updated the Municipal Code to outright permit duplexes in single family residential areas to comply with House Bill 2001. The City is also committed to developing provisions to permit triplexes, quadplexes, cottage clusters and townhouses at a later time after the population of Roseburg surpasses the 25,000 person population threshold. Additionally, with the SDC Buydown Program that the City administers as described in this report (on pages 139-140), higher density housing has been and is continuing to be built within existing City limits. These actions encourage increasing infill development and densities. Any lands within the exchange area may be annexed, at which point these policies will be applied to future development.

K. LAND USE AND URBANIZATION ELEMENT

The Land Use and Urbanization Element has 7 goals and 39 policies. The goals and policies applicable to the requested amendment are addressed below:

“Urban Growth Goal: To manage growth in the Roseburg urban area through cooperative efforts of the City of Roseburg and Douglas County to insure the quality of life of present and future residents of the area, and to contain urban development and preserve adjacent resource lands by:

a. Establishing and periodically reviewing an urban growth boundary to identify and separate urbanizable land from rural land while ensuring sufficient amounts of urbanizable land to accommodate the population needs for the year 2000.

b. Planning and developing a timely, orderly, and efficient arrangement of public facilities and services to serve as a framework for urban development.”

Urban Growth Policy #1: *The City of Roseburg and Douglas County hereby jointly establish an urban growth boundary for the Roseburg urban area, as shown on the General Land Use Plan Map and shall review the boundary every five years or upon request by the City or the County to jointly determine if changes are necessary.*

Finding UGP #1: The City finds that the proposal satisfies the above policy, which brings about the legislative procedure in which the City and County will jointly review the changes to the UGB and make a decision on the approval. A periodic review of the urban growth boundary is overdue, which means this proposal’s review process increases the City’s compliance with the Comprehensive Plan.

Urban Growth Policy #2: *Changes to the urban growth boundary, including either additions or deletions of land, shall be based upon consideration of the following factors:*

a. Demonstrated need to accommodate long-range urban population growth requirements consistent with State land use goals.

b. Need for housing, employment opportunities and livability.

c. Orderly and economic provision of public facilities and services.

d. Maximum efficiency of land uses within and on the fringe of the existing urban area.

e. Environmental, energy, economic, and social consequences.

f. Retention of agricultural land.

g. Compatibility of the proposed urban uses with nearby agricultural activities.

Changes to the urban growth boundary shall also be in accordance with the procedures and requirements as set forth in Statewide Land Use Planning Goal (Goal 2) for goal exceptions.

Finding UGP #2: Factors within this policy were considered when determining areas to include and exclude from the UGB.

a. Demonstrated need to accommodate long-range urban population growth requirements consistent with State land use goals: The City considered long term population projections from the PSU Population Research Center within the 2019 Housing Needs and determined that the projected increases do not necessitate an outright UGB expansion for additional residential lands. Instead, the City shall initiate a urban growth boundary lands exchange where there is marginal net change in potential development density, and a net decrease in acreage. This shall allow for the City to swap a constrained land residential land supply for a less constrained area which will best serve the urban population, consistent with state land use goals as addressed in the previous section.

b. Need for housing, employment opportunities and livability: Both housing and livability have been considered. The Housing Needs Analysis conducted for Roseburg in 2019 concluded that 3,749 new dwelling units would be needed over the next 20 years to meet demand. The HNA suggested “implementing a land swap of sloped land within the UGB for flat land outside of the UGB” to overcome housing supply barriers. This provided the City with a general basis of what areas to prioritize for inclusion in the UGB, which was refined through the Study Area analysis in conjunction with the state’s requirements. The proposed exchange area is generally flat land that will provide greater opportunities for housing at an urban density compared to alternative sites. The proposal does not affect commercial or industrial lands and therefore the consideration for employment opportunities is found to be not applicable.

c. Orderly and economic provision of public facilities and services: The equivalent Goal 14 location factor is addressed in the section “3. Evaluation of Orderly and Economic Provision of Facilities and Services”.

d. Maximum efficiency of land uses within and on the fringe of the existing urban area: The equivalent Goal 14 location factor is addressed in the section “2. Evaluation of Efficient Accommodation of Identified Land Needs”.

e. Environmental, energy, economic, and social consequences: The equivalent Goal 14 location factor is addressed in the section “4. Evaluation of Comparative Environmental, Energy, Economic and Social Consequences”.

f. Retention of agricultural land: The equivalent Goal 14 factor is addressed in the section “1. Evaluation

of Land in the Study Area for Inclusion in the UGB; Priorities”

g. Compatibility of the proposed urban uses with nearby agricultural activities: The equivalent Goal 14 location factor is addressed in the section “5. Evaluation of Compatibility of the Proposed Urban Uses with Nearby Agricultural and Forest Activities on Farm and Forestland Outside the Urban Growth Boundary”.

The City has opted to take no goal exceptions for this proposal.

Urban Growth Policy #3: *The conversion of urbanizable land within the urban growth boundary to urban uses shall be guided by a growth management program which provides for the orderly and economically efficient extension of public facilities and services, while taking into consideration the need for an adequate supply of land to meet future housing requirements. The growth management program shall encourage the development of vacant lands that have urban services before extension of services beyond presently served areas.*

Finding UGP #3: The City and County do not have a formal growth management program, but rather use an urban growth management agreement in order to guide development within the UGB. This is elaborated upon in the Findings for Policies 4-5.

The City finds that the proposed UGB exchange considers both the orderly and economically efficient extension of public facilities and services and the need for an adequate land supply for future housing requirements. The proposal does not encourage the extension of services before the development of vacant lands with urban services, primarily because the proposal does not affect vacant lands that have urban services. The areas proposed to be removed from the UGB are vacant lands, but they are not served by any public infrastructure. No sewer, water, or street infrastructure exists within the Atkinson and Serafin sites, due to slope and elevation constraints which make their extension impractical and inefficient.

Encouraging development in the exchange is determined to be more efficient for the extension of public facilities, and also considers the need for an adequate supply of land to meet current and future housing needs as a high priority. A more detailed justification can be found in the sections for the Study Area Analysis and Consistency with Statewide Goals 10 and 11.

Urban Growth Policy #4: *The City and County shall jointly be responsible for the formulation of a growth management program within the urban growth boundary. The program shall establish general policies and strategies for the orderly extension, within the urban growth boundary, of at least the following facilities and services: Planning zoning, sewer, water, storm, drainage, transportation, parks and fire protection.*

The program shall be developed through consultation among the relevant parties under the joint leadership of the City and County in developing the program, the following shall be considered:

a. The views of the City of Roseburg and Douglas County with respect to the needs for development.

b. The views of School District 4 with respect to the need for educational facilities.

c. The views of special districts with respect to the impact on the extension of services upon their operations.

d. The public and private financial capabilities and responsibilities to finance growth.

e. The equitable distribution of costs between the general public and the new development.

Urban Growth Policy #5: *Criteria for the programming of development shall be as follows:*

a. The financial capability of the affected jurisdictions to provide certain facilities and services as authorized through their respective budgetary processes.

b. The technical requirements of sewer, water, transportation, and other master plans.

c. The need for sufficient amounts of land to maintain an adequate housing market.

The City shall provide levels of services to City residents consistent with community needs as determined by the City Council, within the financial capability of the City, and subject to relevant legal constraints on revenues and their applications. These levels of services shall be provided for in the annual budget of the City. The annual budget shall include an evaluation of the trend of community needs and relevant services and the effect of the preceding year's growth on those trends and the City's capacity to respond to them.

Findings UGP #4-5: There is not a formalized growth management program, but rather all conversion of urbanizable land is governed by an Urban Growth Management Agreement (UGMA), which when applied works to satisfy the intent of the Comprehensive Plan policies above. The City of Roseburg and Douglas County UGMA was adopted in 1984, after the adoption of Roseburg's Comprehensive Plan, and last revised in 1994. While reviewing the above Urban Growth policies, the City recognizes that the language in some portions does not reflect the current practices of the City and County's joint growth management, which can be explained by the fact that the Land Use and Urbanization text of the Comprehensive Plan has not been updated since its initial adoption, while the UGMA has been jointly formed and agreed upon after the fact.

The first principle of the UGMA, found at 1.1. states that the City and County agree to implement the City's Comprehensive Plan as the plan for the Urban Growth Area- defined as the unincorporated area within the Roseburg UGB. The Roseburg Urban Area Comprehensive Plan, in conjunction with additional agreements within the UGMA, shall establish the standards and procedures for review and action on comprehensive plan amendments, land use ordinance changes, proposed land use actions, provision of services, public improvement projects, and other related matters which pertain to implementing the City Plan within the UGA. The UGMA also establishes two subareas within the Urban Grown Area (UGA), called Subarea 1 and Subarea 2, for the purpose of defining which governmental body has jurisdiction over land use and development within that area. As part of this proposal, the City has included an Amendment to the UGMA that calls for the proposed exchange area be designated as part of Jurisdictional Subarea 2, which is the County's Jurisdictional Subarea.

This is important within the context of the UGB swap because it means that after the proposed exchange area is brought into the UGA, the City's Comprehensive Plan and Development Code will generally determine how the land is urbanized. Public Facilities and Housing policies are designed to meet the goals specified in Policy #3. Planning for the long-term extension and maintenance of public facilities within the UGB occurs in a number of master plans in coordination with special service districts. The UGMA policies to the Comprehensive Plan direct the jurisdictional responsible for meeting said goals.

Section 8.1 of the UGMA states that the City and County shall jointly enter into Urban Service Agreements with Urban Service Providers within the UGB, to ensure the orderly extension of urban services within the UGA.

When the proposed exchange area is added into the UGA, all pre-existing Urban Service Agreements will be in place. The City is actively coordinating with RUSA about providing future service to the exchange area.

Urban Growth Policy #7: *The extension of major facilities, such as interceptors and transmission mains, shall be designed to accommodate expected densities as prescribed on the Land Use Plan Map.*

Finding UGP #7: As part of the proposal, the City's Comprehensive Plan Land Use Plan Map will be amended to include the proposed exchange area within the UGB designated as primarily LDR (Low-Density Residential) with 17.5 acres as PSP (Public/Semi-Public). Facilities shall be designed accordingly to expected densities.

Urban Growth Policy #8: *Sewer and water service shall not be extended outside jurisdiction boundaries except as may be provided for through an intergovernmental agreement or upon agreement by the affected property owner to annex to the jurisdiction providing such service.*

Finding UGP #8: All property owners requesting a new extension of sewer or water service in the proposed exchange area shall first annex their property or consent to future annexation (if the property is not contiguous to the current city limits) before the City agrees to provide service. This condition satisfies Policy #8.

Urban Growth Policy #9: *An opportunity shall be provided for all parties to the urban growth management agreement to comment on all proposals for annexation of property to the City.*

Finding UGP #9: The proposal does not include the annexation of any property into the city limits at this time. Pursuant to UGMA 6.1, the City may annex land in accordance with state law, and shall notify the County of any proposed annexation at least 10 days prior and permit the County to make comments. The City proposes to annex the right of way of Troost St. with the proposal to amend the UGB to include the exchange area, as provided in UGMA 6.1.2. which requires that these actions be considered concurrently.

Urban Growth Policy #10: *New developments shall make maximum use of available land areas with minimal environmental disturbance and be located and designed to minimize such public costs as extension of sewer and water services, schools, parks, and transportation facilities.*

Finding UGP #10: The City took the provision of public facilities and services, environmental consequences and economic factors into consideration when selecting subareas in the Preliminary Study Area and Final Study Area Analysis. New development will be subject to the Roseburg Municipal Code which implements the intentions of the Comprehensive Plan.

Urban Growth Policy #11: *Within the urban growth boundary, residential subdivisions, commercial and industrial development shall be permitted only within the service districts or within the City of Roseburg where service districts or within the City of Roseburg where public sewer and water services are available and other urban facilities are scheduled pursuant to an adopted growth management program. Exceptions to this policy may be only be permitted if mutually agreed to by the City, the County, and the affected service districts.*

Finding UGP #11: Any proposed residential subdivisions will not be permitted within the exchange area without prior annexation of lands into the City limits and extension of public sewer and water services. The intent of the UGB swap is to allow for gradual residential development over time, following the existing standards

specified within the City's development codes. These codes comply with the above policy.

Urban Growth Policy #13: *New development creates a demand for new facilities and services, and because of widespread public reluctance to accept continual increases in the cost of local government, an increased share of the costs of new growth shall be borne by the new growth itself.*

Finding UGP #13: New growth within the exchange area will generally be funded by developers. Other financial programs may be implemented at a later time if conditions are determined to meet the standards of said financial programs. The City may include the exchange area within its Capital Improvement Plan only following significant annexation of lands and development of the area by private sources.

Urban Growth Policy #14: *A continuous 15-20 year supply of developable land shall be maintained within the urban growth boundary to avoid unnecessary increases in land prices created by artificial shortages of land.*

Finding UGP #14: A Housing Needs Analysis was conducted prior to this proposal to assess the sufficiency of the developable residential land supply for the next 20 years. The findings of the analysis state that the Low Density Residential land base in Roseburg has a surplus supply but with constraints to development. The Housing Strategy described actions that the City can take to overcome barriers to development, such as "implementing a land swap of sloped land within the UGB for flat land outside of the UGB." The proposal puts forth actions to ensure future availability of land, to help mitigate rising prices from a shortage.

Urban Growth Policy #15: *Growth management program requirements and procedures should apply to those undeveloped properties beyond that part of the urban area which is already developed for urban uses.*

Finding UGP #15: The UGMA includes a clear definition of jurisdictional responsibility through the division of the UGA into Subarea #1 and Subarea #2. The City proposes to designate the extension area as part of Subarea #2, which is in the County's jurisdiction. All undeveloped properties within the exchange area will have county zoning designation applied to them, under the provisions within the UGMA. The UGMA provides procedural direction for the development within each specified subarea.

Urban Growth Policy #16: *The City of Roseburg, Douglas County, and Special Districts shall develop compatible standards for facilities construction and improvements for streets, sewer, and water mains and storm drains within the urban growth boundary.*

Urban Growth Policy #17: *The City, County, and Service Districts shall develop and coordinate capital improvement programs for public facilities within the urban growth boundary.*

Urban Growth Policy #18: *The City, County, and Service Districts shall develop and adopt financial programs which will provide funding to implement their respective capital improvement programs.*

Findings UGP #16-18: The UGMA provides a basic framework for coordination between City, County, and service providers through the use of Urban Service Agreements, however the City and County maintain separate standards and capital improvement programs. The proposed exchange area will belong to UGA Subarea #2 which will give the County the ability to operate within its own development code while providing notice of actions for the City to comment.

"Residential Development Goal: To promote and encourage residential densities and designs that conserve land

and energy, minimize unnecessary and costly public service extensions and maintain the unique geographic character of the urban are; to enhance and protect the quality of existing neighborhoods; and to ensure varied living areas and housing types for residents of all income levels and an adequate supply of serviced, developable land to support such housing.”

Residential Development Policy #2: *In designating residential densities throughout the urban area, the following shall be considered:*

- a. The capacity of land resources, public facilities, and services.*
- b. The public and private costs of providing necessary urban facilities and services.*
- c. The character of existing neighborhoods.*
- d. The need to accommodate increasing population within the Roseburg urban growth boundary.*

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

- e. Provide convenient and safe access.*
- f. Encourage the use of all facilities and services by residents.*
- g. Avoid nuisances and hazards to residents.*
- h. Produce the most efficient and economic land use pattern, and avoid unnecessary duplication of facilities.*

Finding RD Policy #2: The following considerations are addressed for the proposed densities of the exchange area falling under primarily what is allowed within Low Density Residential zoning:

- a. The capacity of land resources, public facilities, and services: These elements were considered in the Study Area Analysis and further elaborated within the sections for Goals 5, 8, 11, and 12 in this report.
- b. The public and private costs of providing necessary urban facilities and services: These elements were considered in the Study Area Analysis and further elaborated in the Goal 11 section of this report.
- c. The character of existing neighborhoods: The existing neighborhood in the exchange area is zoned as Rural Residential, which has a minimum lot size of 2 acres. However, many of the lots are smaller in size due to the historic platting and neighborhood pattern. Many of the existing lots within this area are less than 1/4th of an acre each, resembling a suburban neighborhood pattern. The City proposes to designate the land as the lowest density residential zoning allowed under code to ease the transition from rural to urban, and to preserve some of the character of the existing neighborhood. The City considers this to be one of the most important factors in designating this area as low density.
- d. The need to accommodate increasing population within the Roseburg urban growth boundary: The 2019 Housing Needs Analysis found that there was an adequate supply of land within the UGB to accommodate increasing population, and the lands entering the UGB will have an equivalent

development capacity as lands exiting the UGB.

The following considerations are addressed based on the location of the exchange area in relation to facilities and services.

e. Provide convenient and safe access: The City finds through the Goal 14 Location analysis that the Charter Oaks area provides reasonably close routes to Roseburg's commercial core, public parks, and other essential facilities especially compared to alternative sites.

f. Encourage the use of all facilities and services by residents: The City finds through the Goal 14 Location analysis that the Charter Oaks area provides reasonably close proximity to Roseburg's commercial core, public parks, and other essential facilities especially compared to alternative sites.

g. Avoid nuisances and hazards to residents: The areas proposed to exit the UGB are primarily hillsides with a slope of 25% or greater, where the construction and maintenance of infrastructure can become much more challenging overtime. Development on steep hillsides exposes residents to risks from erosion and landslides. In contrast, the exchange area is located primarily on flat land with developed roads that connect the area to necessary facilities and services.

h. Produce the most efficient and economic land use pattern, and avoid unnecessary duplication of facilities: Out of the alternative locations in the study area, the Charter Oaks area provides the most efficient and economic continuation of the UGB. The City finds no unnecessary duplication of facilities.

Resulting Procedures

I. DE-ANNEXATION & ANNEXATION

If the UGB swap is approved, land use actions involving the de-annexation of approximately 23 acres of property currently located inside the City limits on the Atkinson property, as well as the de-annexation of approximately 193 acres of the Serafin property will need to occur. The de-annexation process, referred to as a withdrawal of territory in statute, requires City Council to adopt a resolution indicating their intent to change the boundaries of the city, hold a public hearing, and subsequently adopt an ordinance amending the new change. ORS 222.460 contains the requirements the City must follow as it goes through the de-annexation process. The de-annexation and removal from the UGB of both the Atkinson and Serafin properties is proposed as shown in Exhibits 94 and 95.

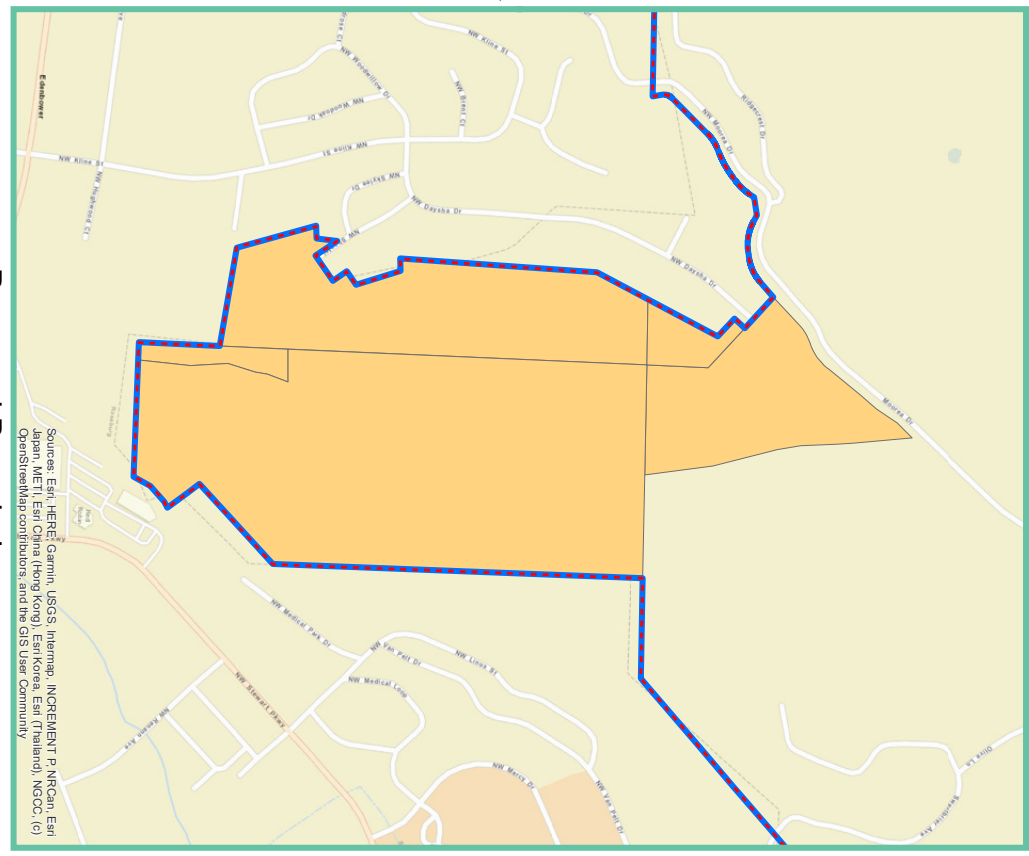
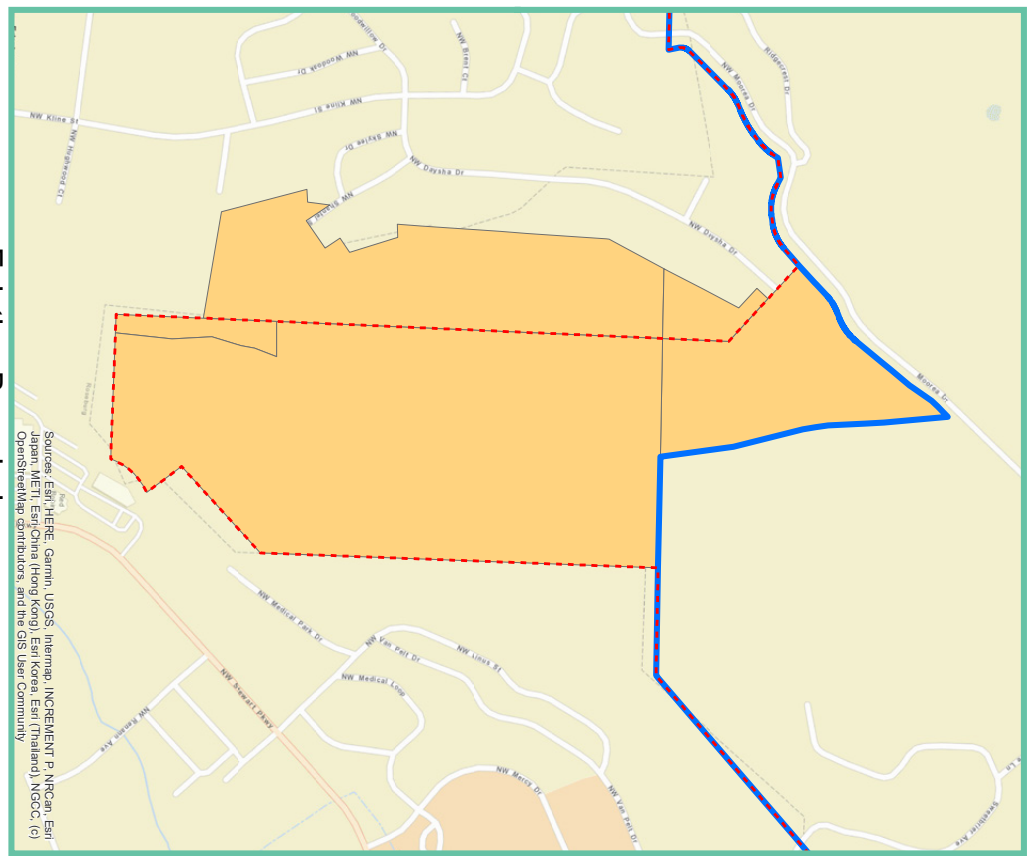
In addition to the de-annexation process for the Atkinson and Serafin properties, the City also proposes to annex the public right-of-way of NE Troost St. in Charter Oaks, as shown within Exhibit 96. No further annexation of private property is proposed at this time as part of the UGB swap project. The annexation of the roadway will require the City to adhere to the requirements of annexation as indicated in ORS 222.111 - ORS 222.190. It is proposed that the right-of-way of NE Troost St. be annexed into the City's jurisdiction from the edge of where the City currently maintains Troost St. near the southern end of O'Brien Heights Subdivision, near Katie Dr. to the western edge of the new UGB line in Charter Oaks near the western edge of the unimproved Fairlea subdivision. The annexation of Troost St. will help to facilitate private property owners immediately adjacent to the right-of-way with the ability to voluntarily annex their properties if they so choose. The City will utilize its annexation policy adopted by City Council through Resolution No. 2006-04 when evaluating properties that are proposed to be annexed. It is anticipated that over time as properties annex, unincorporated islands

of land may begin to form. The City will evaluate the need for City initiated annexations in the future if and when this begins to occur. If the UGB swap is approved, it is anticipated that immediate annexations will occur voluntarily by private property owners adjacent to the Troost St. right-of-way. However, as time continues whether initiated by a single private property owner, a group of private property owners, or the City, policy contained in Resolution 2006-04 dictating the way in which the City should evaluate property to be annexed will be followed along with appropriate statutes governing the annexation process.

Atkinson Current/Proposed UGB & City Limit Boundaries

 Urban Growth Boundary
  City Limits

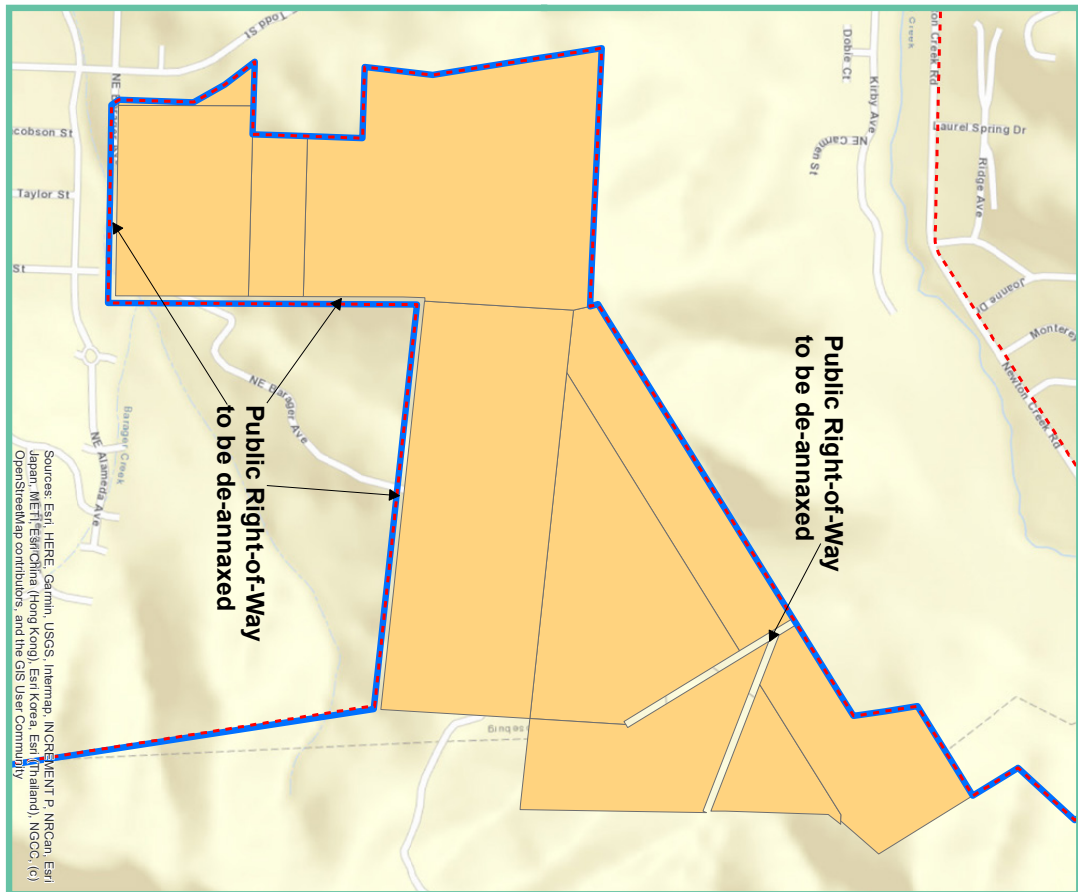
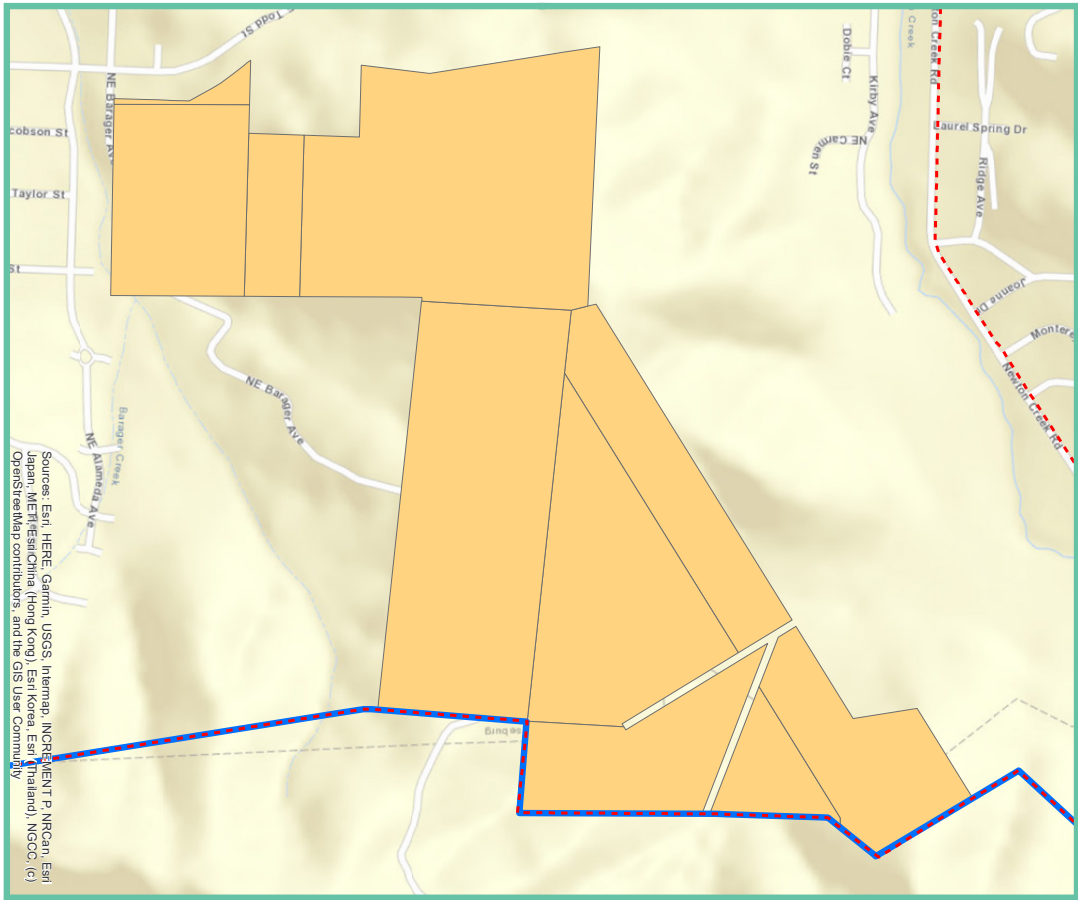
Exhibit 94, Atkinson Boundary Change



Existing Boundaries

Proposed Boundaries

Serafin Current/Proposed UGB & City Limit Boundaries



Urban Growth Boundary



City Limits

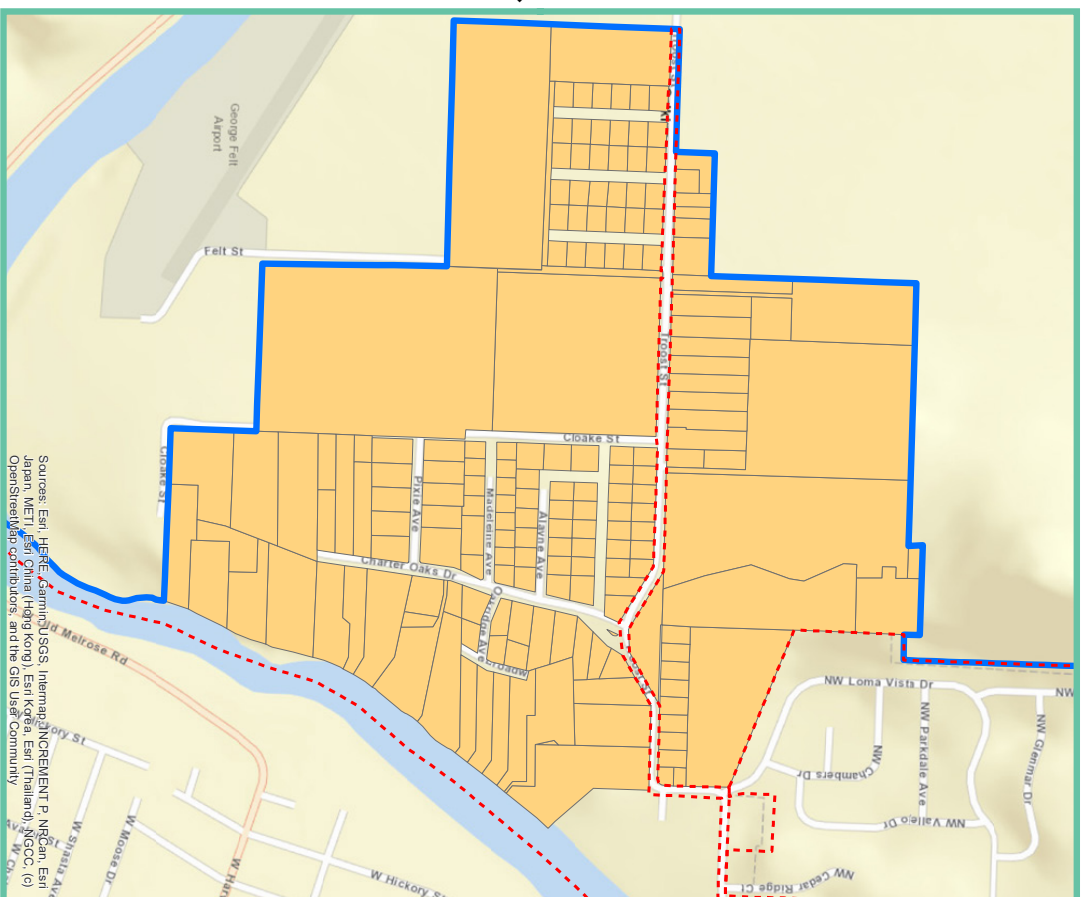
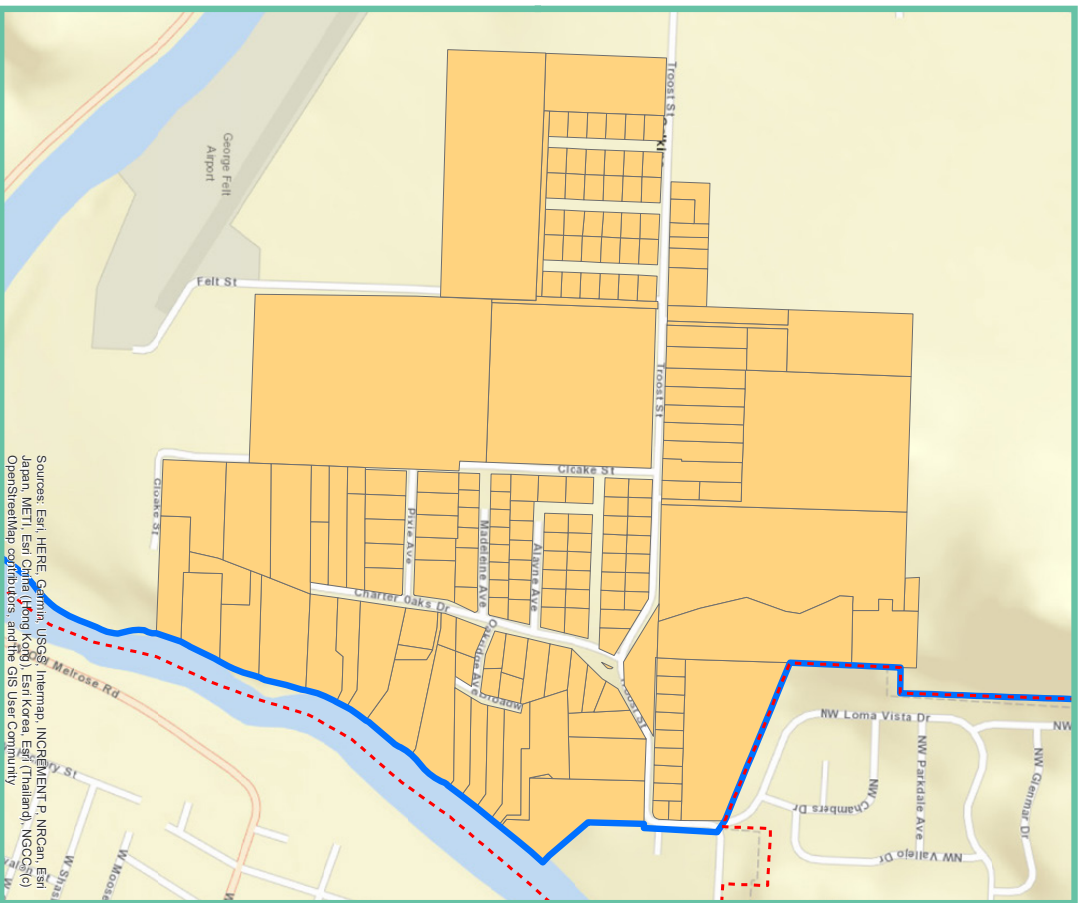
Exhibit 95, Serafin Boundary Change

Existing Boundaries

Proposed Boundaries

Expansion Area Current/Proposed UGB & City Limit Boundaries

 Urban Growth Boundary  City Limits



Existing Boundaries

Proposed Boundaries

2. COMPREHENSIVE PLAN MAP AMENDMENT & ZONE CHANGE PROCEDURE

If approved, as part of the completion of the UGB exchange and City de-annexation process, the County must through its own legislative amendment procedure assign the Atkinson and Serafin properties with appropriate County Zoning and Comprehensive Plan Map designations. After previous coordination with both private property owners, the County Planning Department, and the Oregon Department of Land Conservation and Development, the City recommends the County assign the entirety of the Atkinson property (91.5 acres) with either a Rural Residential-5 (RR5) or Committed Residential-5 (RC5) Comprehensive Plan Map designation and its accompanying Rural Residential-5 (5R) zoning designation.

For the Serafin property (193 acres), the City recommends the County designate 114 acres to be either a Rural Residential-5 (RR5) or Committed Residential-5 (RC5) Comprehensive Plan Map designation and assign the accompanying Rural Residential-5 (5R) zoning designation. The 5R zoning would be located on the western half of the property where it is anticipated that limited residential development could occur based on the new County zoning requirements, along the top of a ridge near the center of the property.

The City recommends the County assign the remaining 79 acres on the northeastern portion of the property with the Farm Forest (FFT) Comprehensive Plan Map designation and the Farm Forest (FF) zoning designation. See Exhibit 10, Serafin Proposed County Zoning/Plan Map for reference. This northeastern portion of the property is located on the backside of a ridge facing the valley that forms Newton Creek. Topography and limited access would eliminate the possibility of future development of this location regardless of whether being built to County or City standards. The City understands that Douglas County will need to make findings of fact in order to proceed with the rezoning of property into the Douglas County zoning classification system. The Douglas County Comprehensive Plan defines the Farm/Forest Resource zone as: Farm/Forest Resource. This zoning category, authorized as a mixed agriculture/forest zone under OAR 660-06-050, shall be called "Farm Forest" (FF) and shall be implemented by an 80 acre minimum parcel size. The 80 acre parcel size meets the Goal 4 standard without additional approval criteria.

The City finds that the portion of the site to be zoned FF will meet the definition of forested lands because it will help to maintain the soil, air, water, and wildlife resources of the surrounding area. The City also finds that the portion of the site to be zoned FF will meet the definition of agricultural land as defined in OAR 660-033-0020. Although this land does not meet the definition of (1)(a)(A), it meets the definition of (1)(a)(B), Land in other soil classes that is suitable for farm use as defined in ORS 215.203(2)(a). The description of Farm Use in ORS 215.203(2)(a), is as follows: As used in this section, "farm use" means the current employment of land for the primary purpose of obtaining a profit in money by raising, harvesting and selling crops or the feeding, breeding, management and sale of, or the produce of, livestock, poultry, fur-bearing animals or honeybees or for dairying and the sale of dairy products or any other agricultural or horticultural use or animal husbandry or any combination thereof. "Farm use" includes the preparation, storage and disposal by marketing or otherwise of the products or by-products raised on such land for human or animal use. "Farm use" also includes the current employment of land for the primary purpose of obtaining a profit in money by stabling or training equines including but not limited to providing riding lessons, training clinics and schooling shows. "Farm use" also includes the propagation, cultivation, maintenance and harvesting of aquatic, bird and animal species that are under the jurisdiction of the State Fish and Wildlife Commission, to the extent allowed by the rules adopted by the commission. "Farm use" includes the on-site construction and maintenance of equipment

and facilities used for the activities described in this subsection. “Farm use” does not include the use of land subject to the provisions of ORS chapter 321, except land used exclusively for growing cultured Christmas trees or land described in ORS 321.267 (Lands not eligible for special assessment) (3) or 321.824 (Lands not eligible for special assessment) (3).

The City finds that it is feasible to engage in “farm use”, as described above, on this portion of the site, and that this portion of the site meets the State definition of forested lands. The City finds that the portion of the Serafin site to be zoned Douglas County designation of FF is accurate and is consistent with these applicable laws.

As the Charter Oaks area will now be located inside the UGB, it will be necessary for the City to designate a City Comprehensive Plan Map designation that will help to steer future growth consistent with that of the City. The City is proposing the Low Density Residential designation as the appropriate assignment for 211.5 acres of the new UGB area, with the Public, Semi-Public Comprehensive Plan Map designation covering the remaining 17.5 acres owned by the Roseburg Public School District. The Low Density Residential designation provides for a residential density of up to six units per gross acre. This density allowance is consistent with the density calculations required in order to determine the acreage allowed to be used for the swap to define the new boundaries of the UGB. The land use pattern for the Low Density Residential Comprehensive Plan is predominantly single-family homes which is also consistent with the existing neighborhood. Other types of compatible land uses that are permissible within the Low Residential Density designation and provide services to the individuals living in the residential areas include churches, schools, and parks, which helps to reinforce the public, semi-public comprehensive plan designation being proposed for the School District.

Although the Charter Oaks area will be required to have City Comprehensive Plan Map designations as it will now be located inside the new UGB, the City is proposing that the County apply the Suburban Residential (SR) zoning designation and maintain jurisdictional control of the area for zoning purposes until annexed into the city limits. The SR zone is intended to provide for a primarily single-family suburban environment within which certain limited agricultural pursuits may be carried on. The zone is intended to be applied in those areas which are within adopted UGB’s, yet have limited urban services. The Roseburg Public School District property will be assigned the County Public Reserve (PR) zone. When annexed it is anticipated that properties assigned a Low Density Residential Comprehensive Plan designation will be given a Low-Density Residential (R10) City zoning designation and properties assigned a Public, Semi-public Comprehensive Plan designation will receive a Public Reserve (PR) City zoning.

The City’s residential zoning districts, including the R10 zone, are primarily intended to create, maintain and promote housing opportunities and to maintain and promote the desired physical character of existing and developing neighborhoods. District standards provide development flexibility, while at the same time helping to ensure that new development is compatible with the City’s many neighborhoods. In addition, the regulations offer certainty for property owners, developers and neighbors about the limits of what is allowed.

The purpose of the PR zone is to provide for a variety of public service activities. It is intended to be applied primarily, though not exclusively, to publicly owned lands. The definition of “Public and semi-public buildings and uses” as contained in Roseburg Municipal Code (RMC) Title 12 of the Land Use and Development Regulations indicates that buildings and uses for this purpose are principally of an institutional nature and serve a public need, such as schools.

3. CITY OF ROSEBURG AND DOUGLAS COUNTY UGMA AMENDMENT

The City of Roseburg and Douglas County utilize an Urban Growth Management Agreement (UGMA) for the joint management of the Roseburg Urban Growth Area (UGA) and for coordination of land use activity in identified areas of mutual interest. The current agreement came into effect on October 12, 1994. The UGMA provides split land use jurisdiction of the UGA between the City and County. These two different jurisdictions are referenced as Subarea 1, which is controlled by the City, and Subarea 2, which is controlled by the County. Exhibit A, within the UGMA provides a map of the UGA and identifies those areas considered Subarea 1 or Subarea 2. The majority of the City's original jurisdiction of the UGA has been annexed since 1994 when the UGMA was last updated. As a result, the current map needs to be updated to reflect the areas now annexed, as well as to include the adjustments made as part of the UGB swap. This means the UGA will be amended to exclude the Atkinson and Serafin property, but adjusted to include the new area within Charter Oaks. This adjustment will require adoption of a new ordinance by both the County and the City officially amending the current UGMA.

In order to ease the transition of the UGB swap for those within the Charter Oaks area, the City is proposing that the County maintain land use jurisdiction by designating this new portion of the UGA as Subarea 2. This will mean that simple Site Reviews for items like remodels/additions to existing single family dwellings or new/remodeled accessory structures will continue to be reviewed by the County for conformance with the proposed SR zone. If owners wish to develop their property further, by dividing it through a partition or subdivision process, public utilities will need to be provided, which will necessitate the need to annex the property thus enabling the City to apply the R10 zone. Once annexed, the City will be able to ensure that development occurs to urban standards, reduce capital improvement costs, and maximize the efficiency of land within the area.

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APPENDIX 1.

Excerpt from the
Douglas County - City of Roseburg
Urban Growth Management Agreement

APPENDIX 2.

Roseburg Public Schools:
Educational Facility Assessment & Long-Range Planning

APPENDIX 3.

Wetland Determination Report
for properties located north and south of NW Troost St

APPENDIX 4.

Stormwater Feasibility Assessment

APPENDIX 5.

Troost St. Traffic Impact Study

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Legal Descriptions