

**City of Redmond  
Comprehensive Plan Map Amendment  
Legislative Action for Amending the Urban  
Growth Boundary – Far West Area**

**Prepared for:**

**City of Redmond**  
716 SW Evergreen  
P.O. Box 726  
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**Prepared by:**

**Far West Redmond Property Owners**

**June 2006**

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## I. PROPOSAL SUMMARY INFORMATION

File No: TA 06-01; PA 06-03

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Request: To amend the Redmond Urban Growth Boundary (UGB) to include 35 tax lots (168.50 acres) for residential, neighborhood commercial, and neighborhood scale employment development, to update the comprehensive plan designations of these lots, and to adopt policies for the character, design, and direction of future urban growth in the urban growth boundary, and to establish procedures for bringing Urban Reserve Areas (URAs) into the UGB.

Location: Those lands identified as being included in the Redmond Urban Reserve Area lying west of Helmholtz Way, north of Obsidian Avenue and located on either side of state Highway 126.

Legal Description: The land proposed for the Far West UGB expansion is comprised of the lots shown on Attachment 3.

## II. INTRODUCTION

### Background

The City of Redmond is submitting this Plan Amendment proposal to do the following:

- Establish a sufficient inventory of urbanizable lands to satisfy a 20 year planning horizon commencing on August 16, 2006.
- Expand the existing Urban Growth Boundary (UGB) by 168.50 gross acres to complement areas 1 and 2 and to address housing land needs, to provide land for development of neighborhood commercial services, to provide employment land for industrial development so as to better balance the distribution of employment land and housing in the community;

- Establish a policy framework for community design and character and that re-orient land uses that support residential development in commercial service centers away from major highways;
- Establish a policy framework determining the preferred direction for future urban expansion;
- Establish procedures for bringing adopted Urban Reserve Areas (URA) into the UGB, and
- Establish procedures for securing development approval of land in the UGB that is designated future urban on the comprehensive plan map.

The Far West Expansion Area is being included to complement the Northwest Expansion Area and the North and West Expansion Area. The lands included in the later two areas are necessary to provide the city with a supply of buildable lands to the year 2025. Because of the amount of time consumed by this project a gap has developed between the end of the 2003-2025 planning period and an actual 20 year horizon from the completion of the urban growth boundary expansion, scheduled for August 16, 2006 as indicated on the 45-day notice provided to the Oregon Department of Land Conservation and Development (DLCD). The lands included in the Far West Expansion Area are necessary to bridge this gap and ensure that the city enjoys a full 20 year land supply. Including the Far West Expansion Area, a rural residential exception area, is also helpful to balance the presence of irrigated agricultural land that has been necessary to include at other locations.

The area proposed for Urban Growth Boundary (UGB) expansion is illustrated in Figure 1.1. The affected area includes approximately 168.50 acres, and is currently zoned for Mixed Use Agriculture (MUA-10) by Deschutes County (Figure 1.2). The area is being designated for future urban uses in the Redmond Comprehensive Plan to meet critical housing needs identified in a Redmond urbanization study prepared by ECONorthwest and to provide a better distribution of housing and employment lands in the UGB. The proposed UGB expansion is in the western Redmond Urban Reserve Area (URA) that was adopted by the City and Deschutes County in 2005. Only lands designated as urban reserve are proposed for annexation to the UGB.

The Redmond URA project was administered collaboratively by the City of Redmond and Deschutes County. The adopted URA includes 5,664 acres and, when added to undeveloped land inside the existing Redmond UGB, is expected to meet future residential, commercial, and industrial land needs for the City of Redmond for the next 50 years. The URA designations were established through amendments to the City of Redmond Comprehensive Plan policies and maps and to Deschutes County's Comprehensive Plan policies, maps, Transportation System Plan, and zoning codes. The URA adoption process met state land use and transportation regulations.

The Redmond City Council unanimously recommended 5,664 acres for designation as urban reserve to the Deschutes County Board of Commissioners on May 10, 2005. A second public hearing was held by the Redmond City Council on June 14, 2005 to take testimony on the URA recommendation, especially from affected property owners. The County Board of Commissioners held a public hearing on July 21, 2005 and adopted the URA recommendation. The designated Redmond URA boundary is shown in Figure 1.3.

The Far West Expansion Area is comprised of a collection of neighbors near the Reindeer Ranch, just west of Redmond, Oregon. The area lies north and south of Hwy 126, west of Helmholtz Avenue and is included in the Redmond Urban Reserve Area. About 28 property owners hold the 168.50-acres. The owners of these 35 tax lots have been devoted to the city's urban growth boundary expansion project. The Far West Redmond Property Owners have attended nearly every public meeting the city has held and have presented the city with detailed written comments describing why this area can and should be included in the city's urban growth boundary, including a neighborhood letter bearing the signatures of over 40 area residents.

As part of the Urban Reserve process a report was prepared by OTAK, Inc, a professional land use planning firm, that identified the lands immediately west of Redmond (W-1) as having the best overall potential for urban development. Please see Redmond Urban Reserve Analysis, OTAK, Inc. – June 30, 2003. Lands to the North and Northwest were given priority for inclusion into the UGB because of their proximity to the city's waste water treatment plant. The western lands were given the next highest priority for inclusion.

The city workshops have been well attended. Two meetings were dedicated to "Developers". Two meetings were dedicated as "Neighborhood Meetings."

The city's Criteria/Key Issues stated in the report delivered by city Staff to the city Council on April 4, 2006 were:

1. 2000 +/-acres (based on having a 20-year land supply for 2025).
2. Transportation
  - a) Create arterial backbone (west side corridor)
  - b) Disperse Traffic
3. Sewer
  - a) Complete west side interceptor
  - b) Gravity Flow
4. Schools/Public Facilities
5. Jobs/Housing Balance

The city's original draft map did not include the Far West Expansion Area. After numerous workshops the city planning commission recommended that the area be included and a portion of the area to the south be removed. At the April 4 joint city council/planning commission workshop city staff offered the planning commission recommendation and offered a staff recommendation. On the advice of staff, the city council chose to remove the Far West Area from the draft map in favor of adding additional lands to the south.

After additional consideration the city has now concluded that it is appropriate to include the Far West Expansion Area and that this area can make important contributions to all of the city's stated priorities. The Far West Expansion Area is important because additional land is needed for a slightly longer planning horizon, the arterial transportation backbone will be strengthened and development in the center of this corridor will disburse traffic, the entire area can be served with gravity sewer and it is closer to existing schools than other areas. Furthermore, the Far West Expansion Area is important because the systems development charges (SDC's) collected

from the area will help extend sewer and other public facilities to the south in a timely manner and opportunities for a mixed use neighborhood and neighborhood scale employment activities can help promote a jobs housing balance without inundating the area with industrial levels of traffic that would be more appropriate at other locations.

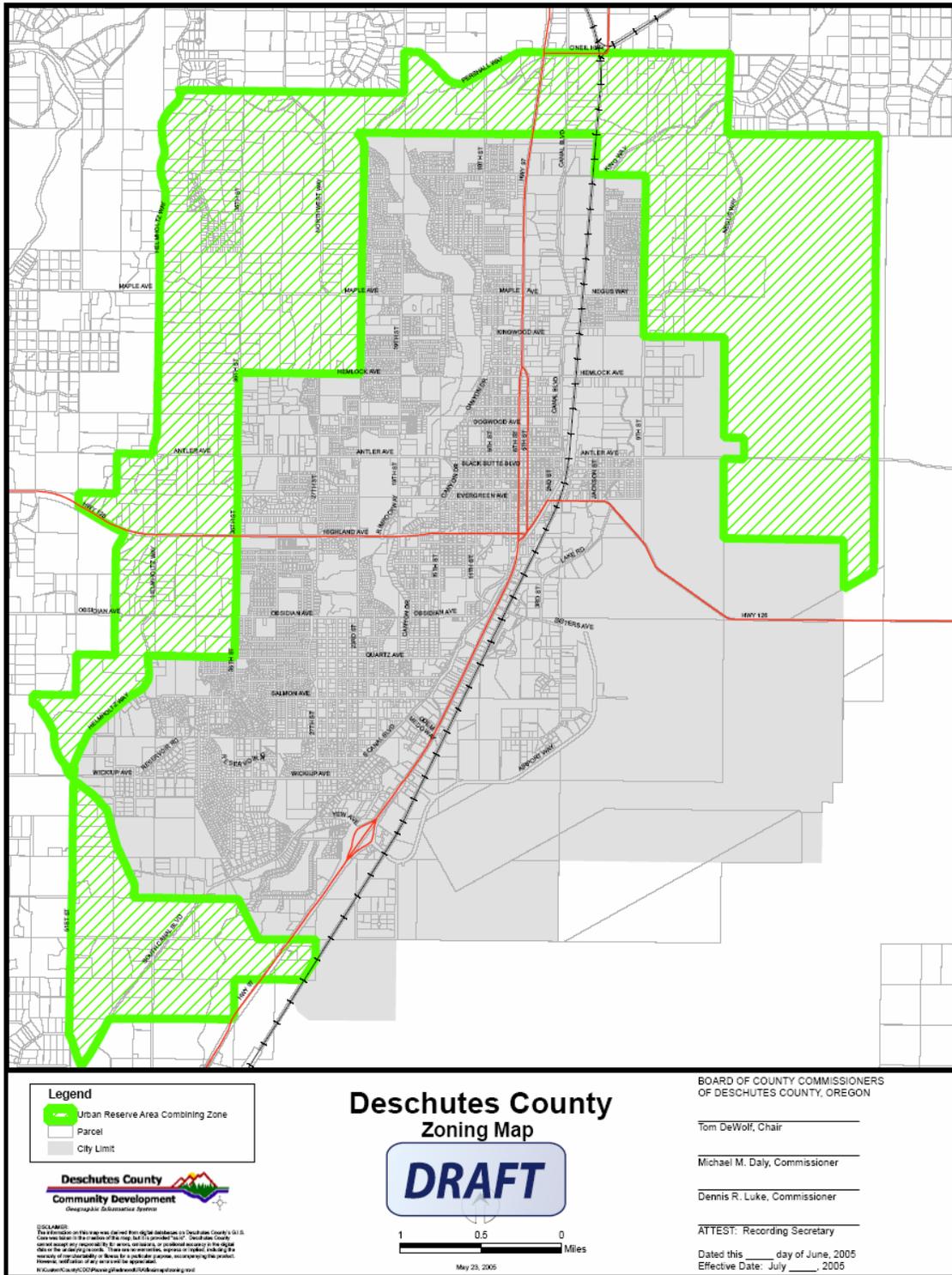
**Figure 1.1 – Proposed Far West UGB Expansion**

See Attachment 3.

**Figure 1.2 – Current County Zoning in the Phase 1 UGB Expansion Area**

Not currently available.

Figure 1.3 – Adopted Redmond Urban Reserve Areas



Source: Deschutes County, Redmond Urban Reserve Project  
<http://www.co.deschutes.or.us/download.cfm?DownloadFile=528079F5-BDBD-57C1-9B436B9F47F86222>

### III. CONFORMANCE WITH STATEWIDE PLANNING GOALS

Discussion: The statewide planning goals form the basis for city and county planning programs. The courts have repeatedly upheld that when a local comprehensive plan is amended the statewide planning goals apply and must be determined to be satisfied or an explanation provided why certain goals do not apply.

*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.*

Response:

- The process for this proposed plan amendment includes notice and hearings that are requirements of legislative plan amendments in the City of Redmond.
  - Citizen involvement in this proposed map amendment is structured to meet notice and hearing requirements for legislative actions established in Article II (Land Use Procedures) of the Redmond Development Code (Sections 8.1100 to 8.1125)
    - Three different public hearings are scheduled
      - Joint County and City Planning Commission Public Hearing
      - Redmond City Council Public Hearing
      - Deschutes County Board of Commissioners Public Hearing
    - Hearings will be preceded by required notice in local newspapers and mailed notices to affected property owners (Measure 56 notice) in addition to notice and project information on the County's website with a link on the City's website

The Far West Redmond Property Owners have attended nearly every public meeting the city has held and have presented the city with detailed written comments describing why this area can and should be included in the city's urban growth boundary. The group's comments included a neighborhood letter bearing the signatures of over 40 area residents. In addition to material submitted by the Far West Redmond Property Owners, the city has received several letters from other parties supporting inclusion of the Far West Expansion Area.

*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.*

Response:

- The proposed map amendment draws from the City's Urban Reserve Area (URA), and as such is part of an orderly process of planning land use and urban growth.
- The City's urban reserves and this proposed UGB expansion map amendment are based on a series of technical studies and other relevant information.

- Visioning Redmond, City of Redmond Design and Vision 2005, prepared by Angelo Eaton & Associates, ECONorthwest, HDR, and David Evans & Associates
- *Redmond Urban Reserve Analysis* memo, prepared by OTAK, June 30, 2003
- *Draft Urban Reserve Findings*, prepared by OTAK, January 14, 2005
- *Revised 2050 Population Forecast* memo, prepared by ECONorthwest, August 13, 2004
- *Redmond Urbanization Report*, prepared by ECONorthwest and Angelo Eaton & Associates, June 2005 (See Attachment 6)
- *Building Permit Information*, provided by the city of Redmond
- *Public Facilities Technical Memorandums*, provided by the city Public Works Department

*Goal 3: Agricultural Lands*

Response:

The purpose of Goal 3 is to preserve and maintain agricultural lands. The text of Goal 3 goes on to say that “Agricultural lands shall be preserved and maintained for farm use, consistent with existing and future needs for agricultural products, forest and open space and with the state’s agricultural land use policy expressed in ORS 215.243 and 215.700.”

The legislative policy stated at ORS 215.243 forms the basis for state and local agricultural lands protection programs. In adopting the agricultural land use policy the state legislature has declared that:

- (1) Open land used for agricultural use is an efficient means of conserving natural resources that constitute an important physical, social, aesthetic, and economic asset to all of the people of this state, whether living in rural, urban or metropolitan areas of the state.
- (2) The preservation of a maximum amount of agricultural land is necessary to the conservation of the state’s economic resources and the preservation of such land in large blocks is necessary in maintaining the agricultural economy of the state and for the assurance of adequate, healthful and nutritious food for the people of this state and nation.
- (3) Expansion of urban development into rural areas is a matter of public concern because of the unnecessary increases in costs of community services, conflicts between farm and urban activities and the loss of open space and natural beauty around urban centers occurring as the result of such expansion.
- (4) Exclusive farm use zoning as provided by law, substantially limits alternatives to the use of rural land and, with the importance to the public, justifies incentives and privileges offered to encourage owners of rural lands to hold such lands in exclusive farm use zones.

It is clear that the state of Oregon has a highly developed culture of protecting agricultural areas for crop and livestock production. In fact, farm land protection and exclusive farm use zoning is a hallmark of the Oregon planning system. Another Oregon hallmark is the requirement for cities and counties to adopt urban growth boundaries pursuant to Goal 14.

As will be discussed in more detail later, Goal 14 creates a legal duty for cities and counties to provide land for urban development needs. More specifically, Goal 14 directs cities and counties 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.

Anytime one goal calls for preservation and another goal directs plans for growth the potential for conflict exists. This case is no exception. The city and county must plan for future urban development as contemplated by Goal 14 while honoring Goal 3's mandate to preserve agricultural land. The different missions of Goals 3 and 14 present the city and county with a conflict that must be reconciled.

Longstanding case law identifies that when there is a conflict between two Goals, they shall be read together and harmonized. The urban reserve area includes agricultural land protected under Goal 3 as well as other lands that are not protected under Goal 3. Much of the agricultural land is characterized by the presence of irrigation.

The natural way to harmonize or balance the different demands of Goal 3 and Goal 14 is to utilize nonagricultural alternatives when such areas are available and present a legitimate alternative. Some agricultural lands must be sacrificed in order that the city may meet its growth needs. However, other lands that are not protected as agricultural areas must also be made available for urbanization activities so that farm ground, particularly irrigated farm ground is not prematurely retired.

The soil survey for the Deschutes Area was originally prepared by the USDA Soil Conservation Service (SCS), which has gone on to become the Natural Resource Conservation Service (NRCS). The maps included in the Deschutes Area Soil survey show that much of the land surrounding the city of Redmond is considered Deschutes Sandy Loam. Additional information provided by the NRCS identifies that Deschutes Sandy Loam has an agricultural capability Class III when irrigated and is considered a prime agricultural soil. When Deschutes Sandy Loam is not irrigated it has an agricultural capability class VI and is not considered a prime agricultural soil. Redmond Sandy Loam is another soil that is present in more limited quantities and is considered class III soil and therefore prime when irrigated and class VI when not irrigated.

A chart entitled "High-Value Farmland Soils" has been developed by the Department of Land Conservation and Development in consultation with the NRCS. This chart has been included as part of Attachment 8 and shows that the Deschutes Area includes no inventoried class I soils and very few, if any, inventoried class II soils. Therefore, irrigated class III soils constitute the most productive farmlands Deschutes County has to offer.

The map included on page 98 of the 1979 Deschutes County Comprehensive Plan Resource Element shows that nearly all of the land near Redmond, west of Hwy 97 is included in an irrigation district. Judging from the map, it appears that the only portion of this area not included in the irrigation district is on and immediately around Forked Horn Butte. Tracts comprised of prime soil are considered "high-value farmland" pursuant to ORS 215.710.

As fuel costs continue to escalate the prices of food and fiber will also increase, particularly when these goods are shipped from distant locations. If this trend does not level off it may become increasingly important that urban areas retain an adequate amount of nearby irrigated farmland to produce commodities for the local market. The farmlands around Redmond have historically been used for crop, livestock and dairy production. Although some of the more intensive agricultural practices have subsided commercial farm operations continue to be present. Past practices can become revitalized and could become more important to the ability to provide affordable food to the citizens of Redmond and Deschutes County.

The Far West Expansion Area is a rural residential exception area. This means that Deschutes County has made a determination that the area is “irrevocably committed” to uses other than commercial agriculture. Therefore, the Far West Expansion Area is not considered agricultural land as that term is defined by Goal 3 and OAR 660-033-0020(1) and is not protected by Goal 3.

More important to maintaining Goal 3 compliance, including the Far West Expansion Area guarantees that the city has selected the maximum amount of nonagricultural lands while maintaining the most efficient configuration of urban development possible. Including the Far West Expansion Area is critical to this overall Urban Growth Boundary expansion project because it provides certainty that agricultural lands protected under Goal 3 remain available for resource uses at other rural locations around the city. The Far West Expansion Area also serves to balance the agricultural lands that have been necessary to be included in the Northwest and North & West Expansion Areas.

#### *Goal 4 Forest Lands*

Response:

The Redmond urban growth boundary expansion project includes no forest lands. Therefore, statewide planning goal 4 does not apply.

#### *Goal 5 Open Spaces, Scenic and Historic Areas, and Natural Resources* *To protect natural resources and conserve scenic and historic areas and open spaces.*

Response:

#### Oregon Administrative Rule 660, Division 23

According to applicability provisions of OAR 660 Division 23 (Procedures and Requirements for Complying with Goal 5), this proposed Post-Acknowledgement Plan Amendment (PAPA) is not required to apply the Goal 5 process to the Far West UGB Expansion Area because there are no identified Goal 5 resources identified in the area according to Deschutes County's Goal 5 inventory.

#### *660-023-0250 Applicability*

*(1) This division replaces OAR 660, Division 16, except with regard to cultural resources, and certain PAPAs and periodic review work tasks described in sections (2) and (4) of this rule. Local governments shall follow the procedures and requirements of this division or OAR 660, Division 16, whichever is applicable, in the adoption or amendment of*

*all plan or land use regulations pertaining to Goal 5 resources. The requirements of Goal 5 do not apply to land use decisions made pursuant to acknowledged comprehensive plans and land use regulations.*

*(2) The requirements of this division are applicable to PAPAs initiated on or after September 1, 1996. OAR 660, Division 16 applies to PAPAs initiated prior to September 1, 1996. For purposes of this section "initiated" means that the local government has deemed the PAPA application to be complete.*

*(3) Local governments are not required to apply Goal 5 in consideration of a PAPA unless the PAPA affects a Goal 5 resource. For purposes of this section, a PAPA would affect a Goal 5 resource only if:*

*(a) The PAPA creates or amends a resource list or a portion of an acknowledged plan or land use regulation adopted in order to protect a significant Goal 5 resource or to address specific requirements of Goal 5;*

*(b) The PAPA allows new uses that could be conflicting uses with a particular significant Goal 5 resource site on an acknowledged resource list; or*

*(c) The PAPA amends an acknowledged UGB and factual information is submitted demonstrating that a resource site, or the impact areas of such a site, is included in the amended UGB area.*

#### Other Goal 5 Findings

- The Goal 5 inventory for the Far West Expansion Area was intended to be based on Deschutes County's inventory of Significant Open Spaces and Natural Resources. However, the only Goal 5 resource from the existing County inventory located in the Redmond area is found in an eastern portion of the Urban Reserve Area, and not in the Far West Expansion Area.<sup>1</sup>
- In Urban Reserve findings presented February 27, 2005, the Planning Commission found there to be no negative environmental, energy, social, or economic consequences of designating 4,384 acres of land as urban reserves. The Far West Expansion Area is part of these urban reserves.
- Scenic resources and view sheds will be protected through the regulation of street alignments, park locations, identified view sheds and will be addressed in amendments to the RDC and master plans required for development in this area.
- The Deschutes County Landmarks Commission supervises the protection of historic and cultural resources in the county and within the City of Redmond.
- The Historic and Cultural Resources Element (Chapter 23.108) of the Deschutes County Comprehensive Plan specifies that numerous Central Oregon Irrigation District sites were still to be inventoried as potential Goal 5 resources at the time the Comprehensive Plan was adopted.

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<sup>1</sup> Urban Reserve Area findings presented at the Joint Planning Commission Public Hearing (February 7, 2005) identified one inventoried Goal 5 significant resource property in the proposed urban reserves. The site, known as the Negus Land Fill, is designated Surface Mining (SM) and is located in an eastern portion (E-1) of the proposed urban reserves. The site has been mined for fill material and has served as a primary landfill for northern Deschutes County. This site was identified as a Goal 5 resource because it has approximately 2 million cubic yards of fill material, which is about 26% of the total fill material in the county.

- Chapter 5 – Open Spaces, Scenic and Historic Areas, and Natural Resources Element of Redmond’s Comprehensive Plan establishes general policies with regards to Goal 5 resources and specifically addresses the Redmond Dry Canyon, the Redmond Caves, and canals.
  - The Redmond Dry Canyon is not present at any location within the Far West Expansion Area.
    - The Far West Expansion Area is included in the Central Oregon Irrigation District. Irrigation features are generally limited to small, privately owned ditches and ponds.
  - The caves are located in the vicinity of the Redmond airport, and are not found in the Far West Expansion Area.

#### Master Planning

- The Far West Expansion Area will be master planned in urbanizable areas no less than 100 acres according to Master Planning procedures proposed as Policies 11 and 12 in the amended Urbanization Element (Chapter 14) of Redmond’s Comprehensive Plan.
  - An inventory of significant natural resources, scenic and historic resources, and open space areas that may qualify for protection under Redmond’s Goal 5 resource protection program must be prepared as part of the Master Plan.
  - If these resources are identified in the master plan area, a management plan to protect them must be developed and accompany the master plan.
- Master planning will not be required for proposed development meeting the following conditions according to Development Approval procedures proposed as Policy 16 in the amended Urbanization Element (Chapter 14) of Redmond’s Comprehensive Plan.
  - The parcel is less than 10 acres in size;
  - The site development plan conforms with the minimum housing density guidelines established for the area in the Redmond Urban Framework Plan;
  - The development application includes a local street plan that complies with street spacing and connectivity requirements in the Redmond TSP and showing street connectivity and bike/pedestrian system connectivity to adjacent planned and unplanned residential areas;
  - The parcel can be annexed to the city of Redmond.

#### *Goal 6 Air, Water and Land Resources Quality*

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

Response:

#### Canals and Water Resources

- The Deschutes County Comprehensive Plan (Water Resources, Section 23.112) addresses irrigation canals in terms of protecting and improving the efficiency of water supply.
  - The County shall assist and collaborate with local irrigation districts and other water suppliers in water management planning, and shall cooperate with State and Federal agencies in irrigation canal lining, according to “acceptable environmental, social and economic impacts.”
  - The Water Resources Element does not address the canals as a water quality issue or Goal 6 resource.
- Otherwise there are no known existing surface water resources subject to Goal 6 in the Far West Expansion Area.

#### Water and Land Resources

- Regarding groundwater resources, the City of Redmond has developed a groundwater protection program to minimize adverse impacts of urban development on groundwater resources, particularly from the infiltration of stormwater runoff into the ground. (Per June 2005 draft plan amendment findings.)

#### Air Resources

- Neither Deschutes County nor the City of Redmond has been designated by the U.S. Environmental Protection Agency as a non-attainment or maintenance area for national ambient air quality standards (NAAQS).
- The City of Redmond does not receive – nor has demonstrated the need to receive – federal Congestion Mitigation Air Quality (CMAQ) funds.

#### Master Planning

- Master planning required for the Far West Expansion Area, per Policies 11 and 12 in the amended Urbanization Element (Chapter 14) of Redmond’s Comprehensive Plan, must include the following elements in relation to Goal 6.
  - Review air, noise and water resources that may be impacted by planned development.
  - Specify how adverse impacts will be avoided or mitigated in compliance with applicable local, state, and federal regulations.
  - This requirement is particularly important for the management of urban storm water that is discharged into receiving waters or into the ground.

*Goal 7 Areas Subject to Natural Disasters and Hazards  
To protect people and property from natural hazards.*

Response:

- The Deschutes County and the City of Redmond Comprehensive Plans do not identify lands subject to natural disasters and hazards in the Far West Expansion Area.
- Areas subject to natural hazards, particularly steep slopes will have to be inventoried as part of required master planning in the Far West Expansion Area, per Policies 11 and 12 in the amended Urbanization Element (Chapter 14) of Redmond’s Comprehensive Plan.

*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.*

Response:

City of Redmond Park Master Plan

- The City’s existing Parks Master Plan establishes the standard for park planning as 10 acres per 1,000 residents.

Redmond Comprehensive Plan

- The City’s Comprehensive Plan goal (Chapter/Goal 8) for parks is to provide a neighborhood park within one-half mile of every dwelling.

*Chapter/Goal 6*

- Per the technical element of Chapter 6 – Parks, Recreation, and Open Space Element of the City of Redmond’s Comprehensive Plan (2001):
  - The City, Central Oregon Parks and Recreation District (COPRD), Redmond School District 2J and Deschutes County are the primary providers of parks, open space, trails, sports fields, recreation centers and recreational programs in the greater Redmond area. The City of Redmond is the primary provider for park facilities within the City limits.
  - In 1991, a System Development Charge (SDC) for parks was implemented. The park SDC was increased in 1995 so as to incorporate the in-lieu-of-land fee and eliminate the need for a separate fee.
    - Few developers donate land for park or open space purposes, but when they do and the City accepts, the developers are reimbursed through SDC credits.

- Only four residential developers dedicated land to the City for park use in the 1990s.
- The SDC for parks is set at \$790 per residential unit<sup>2</sup>.
  
- The Chapter/Goal 6 technical element includes tables from the park element of the Public Facilities Plan that establish service population and site size standards for different types of park facilities based on a projected population of 36,000-plus in 2020, as well as an existing parks inventory.

#### *Chapter/Goal 5*

- Per Chapter 5 – Open Spaces, Scenic and Historic Areas, and Natural Resources Element of Redmond’s Comprehensive Plan:
  - It is the City’s policy that canals and the right-of-ways serve as recreation linkages for bike paths, hiking and jogging trails throughout the urban area.

#### Deschutes County Comprehensive Plan

- Per the Recreation Element (Chapter 23.72) of the Deschutes County Comprehensive Plan
  - Standards for park facilities:
    - Park Passive Areas and Neighborhood Parks = 2.5 acres per 1000 population
    - Community Parks = 2.5 acres per 1000 population
    - Regional Parks = 5.0 acres per 1000 population
  - The County shall encourage the development of trails along streams, rivers, and irrigation canals where there is not a conflict with the natural resource.

#### Master Planning

- Sites for new parks and recreation facilities in the Far West Expansion Area will be determined through required master planning in the expansion area.
  - The master plan must identify areas that may be needed to meet park and recreation needs in accordance with the needs analysis in the City of Redmond Park and Recreation Master Plan (Park Plan).
  - In areas where the Park Plan indicates there is a need for neighborhood or community park facilities, the master plan needs to identify land that may be suitable for park development using the design and location criteria included in the Park Plan.

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<sup>2</sup> City of Redmond Systems Development Charges – 2004 Update  
[http://doc.ci.redmond.or.us/Public\\_Works/cor\\_sdc\\_table\\_2004\\_5.pdf](http://doc.ci.redmond.or.us/Public_Works/cor_sdc_table_2004_5.pdf)

### Park Land Needs

- ECONorthwest's *Redmond Urbanization Study* estimates that 280 additional acres of land is needed for parks when expanding Redmond's UGB.
- Extending the planning period to August 16, 2026 will require another 19 acres of land for a total amount of 299-acres needed for parks when expanding Redmond's UGB.
- A UGB expansion of 401 acres in the Northwest Area, 1,761 acres along the western and northern edges of Redmond and 168.50 acres in the Far West are provides adequate land for these park needs. Approximately 77% of this acreage will be provided in the west and north expansion area.
- Estimates of UGB expansion size in the ECONorthwest study account for parks and not park reserves or open space. The total UGB expansion being proposed in map amendments for the Northwest Area and western and northern portions of the Urban Reserve Area (URA) is roughly 100 acres more than the gross acreage identified by ECONorthwest, which can partially provide for open space and park reserves not accounted for in the study.

### *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.*

Response:

### Employment Land Needs

- ECONorthwest's *Redmond Urbanization Study* found that there is a sufficient amount of industrial land in Redmond's existing UGB to serve industrial employment projections for the next 20 years (See Table 6-3 in Attachment 6). The land, however, is concentrated on the east side of Redmond and presents transportation challenges for residents that are concentrated on the west side of the city; east-west transportation facilities are faced with crossing some combination of the following barriers: Dry Canyon, Pilot Butte Canal, Highway 97, and the Northern Burlington Santa Fe railroad.
- The study found that there was an inadequate amount of commercial land in Redmond to serve commercial employment projections for the next 20 years (See Table 6-3 in Attachment 6). In particular, there is not enough land zoned neighborhood or tourist commercial and too much land zoned for highway strip commercial. This reflects past development patterns and needs of a small city located along a state highway versus the needs of a growing and diversifying city.
- One commercial center will be needed to serve the residential development (5000 dwelling units) planned to occur in the western portion of the North & West UGB expansion area and the Far West Expansion Area. The intersection of Helmholtz Way and Obsidian Avenue is an idea location for a mixed use neighborhood center and is identified for this type of activity in the City of Redmond Community Design and Vision, 2005.

*Goal 10 Housing*

*To provide for the housing needs of citizens of the state.*

Response: The primary purpose of the proposed UGB expansion is to provide land for housing. To identify housing needs consistent with the Goal 10 requirements, ECONorthwest performed a housing needs analysis based on local data and policies that would account for single family attached housing options<sup>3</sup>, which ECONorthwest estimated could comprise up to 10% of the housing need. The 2005 *Redmond Urbanization Report* by ECONorthwest (See Attachment 6) identifies the following housing needs for the 2003-2025 planning period:

- 11,628 new dwelling units between 2003 and 2025
- 60%/40% tenure split (owners and renters)
- 60%/40% single-family/multi-family mix
- Additional government assisted units
- Senior housing

ECONorthwest found that 1,962 gross acres of residential land would be needed to accommodate 11,628 new dwelling units between 2003 and 2025. (See Table A below; Table 4.17 in Attachment 6.) However, the analysis also found that up to 4,699 housing units could be accommodated within the UGB, given residential zones are built out with only residential, and not public facility, uses. This leaves 6,929 needed dwelling units that cannot be accommodated in the existing UGB.

Table A. Alternative forecast of needed housing units, Redmond, 2003-2025

Housing Type	New DU	Percent	Density (DU/net res ac)	Net Res. Acres	Net to Gross Factor	Gross Res. Acres	Density (DU/gross res ac)
Single-family detached	5,814	50%	6.0	969.0	25%	1,291.9	4.5
Manufactured	1,163	10%	8.0	145.3	20%	181.7	6.4
Subtotal	6,977	60%	6.3	1,114.3		1,473.6	4.7
<b>Multi-family</b>							
Condo/Townhomes	1,512	13%	9.0	168.0	15%	197.6	7.7
Multifamily	3,139	27%	12.0	261.6	10%	290.7	10.8
Subtotal	4,651	40%	10.8	429.6		488.3	9.5
<b>Total</b>	<b>11,628</b>	<b>100%</b>	<b>7.5</b>	<b>1,543.9</b>		<b>1,961.9</b>	<b>5.9</b>

Source: ECONorthwest

As shown in Table B (Table 6.7 in Attachment 6), the analysis divided the needed housing units between the City's residential zoning districts based on a residential mix of 60% single-family

<sup>3</sup> The Oregon Department of Housing and Community Services models do not distinguish between single family attached and detached housing.

(including 10% manufactured) and 40% multi-family (including 13% condominiums/townhomes). Assuming densities between 6 and 12 dwelling units per net acre depending on the zoning district, the analysis found that a UGB expansion of 1,516 acres is needed to accommodate sufficient housing and associated public facilities.

Failing to plan for an entire twenty years would be under reaching and would compromise the city's ability to provide an adequate amount of land for a variety of needed housing types as contemplated by Goal 10. Local review of this UGB expansion project is scheduled to be completed on August 16, 2006. A twenty year planning period commencing on August 16, 2006 and extending to August 16, 2026 will require an additional 773 housing units to accommodate a population of 47,595, for a total of 12,401 needed housing units. Carrying forward the ratios in Table A shows the following:

Housing Type	New DU	Percent	Density	Net Acres	Net to Gross	Gross Res. Acres	Density
SFD	6,200	50%	6.0	1033	25%	1377.2	4.5
Manufactured	1,240	10%	8.0	155	20%	193.8	6.4
Condo/TH	1,612.13	13%	9.0	179	15%	210.5	10.8
Multifamily	3348	27%	12.0	279	10%	310	9.5
total	12,401	100%	7.5	1,646		2,091.50	5.9

Table B. Estimated size of UGB expansion to accommodate growth between 2003 and 2025

Plan Designation	Code	Capacity	Assumed	Acres		Total Acres Needed
		Deficit (Employees or DU)	Density (EPA or DU/Gross Ac)	Acres Needed for DU/Emp	Needed for Public Facilities	
Airport	Airport	-	na	0.0		0.0
Strip Service Commercial	C1	0	20 emp/net ac	0.0		0.0
Central Business District Commercial	C2	0	20 emp/net ac	0.0		0.0
Special-Service Commercial	C3	0	20 emp/net ac	0.0		0.0
Limited Service Commercial	C4	1,200	20 emp/net ac	75.0		75.0
Tourist Commercial	C5	400	20 emp/net ac	25.0		25.0
Fairgrounds	FG	-	not available	0.0		0.0
Light Industrial	M1	0	8 emp/net ac	0.0		0.0
Heavy Industrial	M2	0	8 emp/net ac	0.0		0.0
Park Reserve - Open Space	OSPR	-	not available	0.0		0.0
Park	PARK	-	not available	0.0	280.0	280.0
Public Facility	PF	1,424	20 emp/net ac	89.0		89.0
Limited Residential	R1	371	6.0 du/net ac	82.4	125.0	207.4
Limited Residential - Planned	R2	0	6.0 du/net ac	0.0	125.0	125.0
Limited Residential - Planned	R3	2,225	7.5 du/net ac	404.5	125.0	529.5
General Residential - Planned	R4	1,201	8.5 du/net ac	184.8	125.0	309.8
Urban High Density Residential	R5	3,442	12.5 du/net ac	344.2		344.2
<b>Total</b>				<b>1,205.0</b>	<b>780.0</b>	<b>1,985.0</b>

The figures provided above can be used to project the land needs for August 16, 2006.

The existing assumptions regarding average household size of 2.54 based on 2000 census data combined with a vacancy rate of 5%, shows that an additional 1,871 citizens will require about 773 more housing units.

The existing assumptions regarding residential density, which is 7.5-units per net acre shows that the city will need an additional about 103 net acres or about an additional 133 gross acres for residential purposes.

The existing assumptions also predict that the city will need about 10-acres of park land per 1,000 population and about 7-8-acres for commercial and public facilities lands per 1,000 population. Rolling these assumptions forward to include additional 1,871 citizens yields about another 19-acres for parks and 15-acres for commercial activities and public services for a total of about additional 34-acres in these categories.

Based on the above, the total additional amount of land needed to ensure a full 20-year land supply is about 167-acres. Including the 168.50 acre Far West Expansion Area falls well within an accepted level of tolerance.

The combination of a UGB expansion of 401 acres in the Northwest Area, 1,761 acres along the western edge of Redmond and 168.50-acres in the Far West Expansion Area provides adequate land for residential, public facility, parks, and commercial needs. There is a 77% of housing accommodated in the west and north expansion area.

*Goal 11 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.*

Response:

The ability to efficiently provide water and sewer to an area is an important consideration when selecting areas to target for urban development. Other things being equal, areas that are easier to serve are better candidates to include in an urban growth boundary than areas that are more difficult to serve.

The Far West Expansion Area is capable of being served by a gravity flow sewer. Furthermore, the same infrastructure placed to enable development east of Helmholtz Way will be used to serve development west of Helmholtz Way. The 2003 Redmond Urban Reserve Analysis prepared by OTAK, Inc. identified this portion of the URA as particularly well suited from a public facilities stand point.

An update of Redmond's Public Facility Plan (PFP) is necessary before master planning and development is proposed in the West and North UGB Expansion Area. If master planning or

development is proposed before the PFP update is completed, the applicant will be required to independently demonstrate compliance with Goal 11.

*Goal 12 Transportation*

*To provide and encourage a safe, convenient and economic transportation system.*

Response:

The Far West Expansion area borders the west side of Helmholtz Way, which is targeted to become the city's principal north-south transportation corridor, for an entire mile and matches lands on the east side of Helmholtz Way that is also targeted for inclusion in the urban growth boundary.

Having both sides of Helmholtz inside the urban growth boundary will make it much simpler to complete the improvements necessary for an urban arterial. Having both sides of the road in the urban growth boundary will make it more economical for the city's tax payers because additional right-of-way will be obtained as properties develop rather than through purchase or a forced condemnation process.

The Far West Expansion Area will allow the city to enjoy having urbanizable land on both sides of Helmholtz from Wickiup Ave. all the way to Antler Ave., a distance of over two miles.

The Far West Expansion Area also includes the western portion of three (3) critical intersections; Helmholtz/Antler, Helmholtz/Hwy 126 and Helmholtz/Obsidian. Improvements will be necessary at all three intersections. The Helmholtz/126 intersection is genuinely dangerous and growing more so as more and more traffic is added to these two facilities. This intersection has a history of fatalities and it is only going to get worse. Improvements here are not going to be a simple matter of trying to avoid north-south traffic backing up. They are going to be a matter of public health and safety.

The Far West Expansion Area provides for loading both sides of the intersections and disbursing the responsibility to additional parties. In addition to construction, improving these intersections is likely to require the acquisition of additional right-of-way that would be more, above, this will be a real challenge if one side of the road is in and the other is out.

The Far West Expansion Area also includes the northern portion of Obsidian Avenue, west of Helmholtz Way. Obsidian Avenue exists west of Helmholtz as a rural road with a 20' +/- chip sealed travel surface located in a 40' right-of-way. For this facility to function as a city street it will need to be entirely rebuilt and an additional 20' of right-of-way will need to be acquired. Rebuilding this section of Obsidian Avenue will, at a minimum, mean removing the existing road and road bed and replacing it with 2-3 inches of asphaltic concrete pavement 36 feet wide placed over six inches of base rock, probably coming to a 60' 10:1 taper on at least one side. In addition to the paving, the street will need a 12 or 14 inch concrete curb and 5-foot concrete sidewalk on both sides complete with street trees, street lights, catch basins and storm drain pipe and drywells. Any overhead utilities will need to be placed in a trench and the sewer and water lines necessary to serve the development will need to be placed in the street with acceptable manhole access.

It will simply not be possible to reconstruct Obsidian Avenue to a city standard in a 40' right-of-way. The Far West Expansion Area will ensure that this road way gets reconstructed in an efficient manner.

An update of Redmond's Transportation System Plan (TSP) is necessary before master planning and development is proposed in the West and North UGB Expansion Area. If master planning or development is proposed before the TSP update is completed, the applicant will be required to independently demonstrate compliance with Goal 12.

*Goal 13 Energy Conservation*

*To conserve energy.*

Response:

The proposed UGB expansion is founded on the need for housing. If sufficient housing is not provided in Redmond, then people working or accessing services in Redmond may be forced to live in other communities and drive into the city for work and services, unnecessarily driving up fuel and energy usage in the city. Insufficient housing in Redmond may also lead to haphazard, "release valve" development patterns in neighboring communities that are not able to capitalize on existing public facilities and infrastructure the way that Redmond is and, therefore, is much less efficient.

Expanding the UGB to the Far West is also part of a vision to create more neighborhood centers around the City of Redmond so that not all commercial activity is concentrated along the highways. A neighborhood center has been identified at the intersection of Helmholtz Way and Obsidian Avenue. The Far West Redmond Expansion Area allows all of the lands surrounding this critical intersection to be included in the city's urban growth boundary. More neighborhood centers will provide the opportunity for residents to choose means other than driving alone -- walking, biking, taking transit -- in order to get to services that otherwise could only be accessed by car. Allowing for these transportation choices will minimize fuel and energy usage associated with vehicle emissions.

*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.*

*Land Need*

*Establishment and change of urban growth boundaries shall be based on the following:*

*(1) Demonstrated need to accommodate long range urban population, consistent with a 20-year population forecast coordinated with affected local governments;*

*(2) Demonstrated need for land suitable to accommodate housing, employment opportunities, livability or uses such as public facilities, streets and roads, schools, parks or open space , or any combination of the need categories in this subsection (2);*

*In determining need, local government may specify characteristics, such as parcel size, topography or proximity, necessary for land to be suitable for an identified need.*

*Prior to expanding an urban growth boundary, local governments shall demonstrate that needs cannot reasonably be accommodated on land already inside the urban growth boundary.*

Response:

City of Redmond and Deschutes County have recently completed a long-range planning exercise to determine suitable areas for future urbanization and, in order to meet the growth needs of the City, have designated 5,664 acres in Urban Reserve Areas (URAs). It has been determined that the urban reserves can accommodate the City's forecasted residential, commercial, and employment growth over the next 50 years and that these areas are appropriate for future UGB expansion.<sup>4</sup> The Northwest Area UGB expansion is proposed to meet an immediate residential lands need, as demonstrated below.

In its City of Redmond Urbanization Study, ECONorthwest provides estimates of population growth forecasts for the city between 2000 and 2025. (Table C below).

Table C. Historical and forecast population and employment, Redmond, 2000-2025

<b>Year</b>	<b>Population</b>	<b>Employment</b>	<b>Pop/Emp</b>
2000	15,505	na	
2003	17,645	10,354	1.70
2005	19,249	11,091	1.74
2010	23,897	13,173	1.81
2015	29,667	15,646	1.90
2020	36,831	18,582	1.98
2025	45,724	22,070	2.07
<b>Change (2003-2025)</b>			
Number	28,079	11,716	2.40
Percent	159%	113%	
AGGR	4.4%	3.5%	

Source: U.S. Census, City of Redmond, Employment Security 202 data;  
 2000 – U.S. Census Data  
 2003 – PSU Estimate  
 2025 – Population and Employment forecasts by ECONorthwest

The *Redmond Urbanization Report* (ECONorthwest, 2005) identified the following housing needs for the 2003-2025 planning period:

- Need for 11,628 new dwelling units
- A 60%/40% tenure split (owners and renters)

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<sup>4</sup> Information about the need for designating urban reserves can be found at: <http://www.co.deschutes.or.us/download.cfm?DownloadFile=6EC9E7B6-BDBD-57C1-90A1A644A0CBE11E>.

- A 60%/40% single-family/multi-family mix<sup>5</sup>
- Needs for additional government assisted units
- Needs for senior housing

The ECONorthwest analysis showed that up to 4,699 housing units could be accommodated within the UGB, given residential zones are built out with only residential, and no public facility, uses. That leaves 6,929 additional dwelling units that cannot be accommodated in the existing UGB. ECONorthwest estimated that these 6,929 dwelling units would require 1,016 gross residential acres outside the 2005 UGB.

HB 2709 (1995) was passed by the Oregon Legislature and signed into law by Governor John Kitzhaber to provide specific guidance on establishing a sufficient amount of buildable land within urban growth boundaries. As part of this legislation ORS 197.296(2) expressly states that urban growth boundaries shall include enough land to accommodate estimated housing needs for 20-years and that the 20-year period shall commence on the date initially scheduled for completion of the periodic or legislative review. While this particular statute may be intended for cities with a population of 25,000 or greater Redmond has chosen to follow a HB 2709 style analysis and methodologies for a determination of its housing needs. Redmond is certainly experiencing a tremendous amount of growth that causes it to be considered a fast growing community and it is in very close proximity to the city of Bend, which is well over 25,000 and experiencing its own rapid growth. Therefore, the city believes that the 20-year planning period should commence on the date that the legislative review is scheduled to be completed. In this case, the date is August 16, 2006. The city recognizes that it could be possible to extend the date ever further to the beginning on 2007. However, the city believes the selected time-frame is responsibly conservative and provides no potential for risk.

The city's choice to utilize a target date of August 16, 2026 is further supported by a draft administrative rule being circulated by the Oregon Department of Land Conservation and Development (DLCD). For several years the Land Conservation and Development Commission (LCDC) has sought to promulgate a rule that would help clarify the urban growth boundary expansion process. The draft rule, OAR Chapter 660, Division 24 would help clarify a number of aspects regarding Goal 14 and planning for future urban growth. Relying on the adopted, acknowledged population forecast completed during the urban reserve planning process in clearly consistent with the provisions of OAR 660-024-0030 of the draft rule. Furthermore, OAR 660-024-0040(2) clearly states that, except for METRO, the 20-year period for a post-acknowledgement plan amendment shall commence on the date initially scheduled for final adoption of the amendment by the local government, provided that date is included in the initial notice of the amendment required by ORS 197.610(1). In this case, the date provided in the initial notice of the amendment required by ORS 197.610(1) is August 16, 2006.

While the draft rule has yet to take the effect of law it has been developed by a panel of urban planning experts appointed as a workgroup by LCDC. The workgroup membership is wide and

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<sup>5</sup> As noted in Chapter 4, the 72%/28% single-family/multi-family mix may inadequately reflect the need for rental units as the City reaches a population of 30,000.

diverse and includes, among others, local land use planners from Bend and Grants Pass, a representative from the Oregon Chapter of the American Planning Association, private sector consulting firms such as CH2MHill and ECONorthwest, private sector interests such as the Oregon Home Builders Association and the Oregon Association of Realtors, as well as a bundle of state agencies including DLCD, ODOT, Housing and Community Services and the Oregon Department of Agriculture. Therefore, the draft rule has been thoroughly vetted by the state's urban planning pundits and is reliable if not absolutely mandatory.

Reading ORS 197.296(2) together with the draft OAR Chapter 660, Division 24 provides the city with an abundance of guidance to show that using August 16, 2006 as the commencement of the 20 year planning period is not only available but preferable.

Moving the figures in table 3 above forward to reflect an August 16, 2026 planning horizon does not require any changes to the core assumptions provided by ECONorthwest. Furthermore, only subtle adjustments to other figures are needed. Population numbers to extend the planning period for a full 20 years commencing on August 16, 2006 are based on the city of Redmond Urban Reserve findings that have been adopted by both the city and Deschutes County and acknowledged by the Land Conservation and Development Commission (LCDC).

As part of the Urban Reserve project the city and county have projected that Redmond will have a population of 78,777 by the year 2050. This same document shows that the city can expect a population of 45,724 by the year 2025 and 50,733 by the year 2030. Table D. below shows the expected population for the city of Redmond between on an annual basis for the six year period between 2025 and 2030. These figures are based on the adopted and acknowledged population forecast and growth rate projections included in the Urban Reserve Findings.

Year	Population	Employment	Pop/Emp
2025	45,724	22,070	2.07
2026	46,867	22,641	2.07
2027	48,039	23,207	2.07
2028	49,240	NA	NA
2029	50,471	NA	NA
2030	51,733	NA	NA
Change 2025-2030			
Number	6009	2921	2.06
Percent			
AGGR	2.5		

Source: City of Redmond Urban Reserve Findings, U.S. Census, City of Redmond, Employment Security 202 data;  
 2000 – U.S. Census Data  
 2003 – PSU Estimate  
 2025 – Population and Employment forecasts by ECONorthwest

As shown above, the adopted population figures demonstrate that the city of Redmond can expect a population of 46,867 by the year 2026 and a population of 48,039 by the year 2027. Because the date of commencement does not fall exactly on January 1 of either year it is necessary to extrapolate the target number from these figures as shown in Table E below.

TABLE E

Date	Jan. 1	Feb. 1	Mar. 1	Apr. 1	May 1	June 1	July 1	Ag. 1	Ag. 16
Pop.	46,867	46,964	47,061	47,158	47,255	47,352	47,449	47,546	47,595

A target population of 47,595 for the planning period commencing on August 16, 2006 and concluding on August 16, 2026 will require the city to account for an additional 1,871 citizens beyond the 2025 population forecast. Converting additional citizens to additional acreages is a relatively simple task.

The existing assumptions regarding average household size of 2.54 based on 2000 census data combined with a vacancy rate of 5%, shows that an additional 1,871 citizens will require about 773 more housing units.

The existing assumptions regarding residential density, which is 7.5-units per net acre shows that the city will need an additional 103 net acres or about an additional 133 gross acres for residential purposes.

The existing assumptions also predict that the city will need about 10-acres of park land per 1,000 population and about 7-8-acres for commercial and public facilities lands per 1,000 population. Rolling these assumptions forward to include an additional 1,871 citizens, yields about another 19-acres for parks and 15-acres for commercial activities and public services for a total of about additional 34-acres in these categories.

Based on the above, the total additional amount of land needed to ensure a full 20-year land supply is about 167-acres.

The ECONorthwest analysis showed that up to 4,699 housing units could be accommodated within the UGB, given residential zones are built out with only residential, and no public facility, uses. That leaves 6,929 additional dwelling units that cannot be accommodated in the existing UGB. ECONorthwest estimated that these 6,929 dwelling units would require 1,016 gross residential acres outside the 2005 UGB.

Building permit information available from the city's community development department show that 761 residential building permits have been issued since May of 2005 authorizing a total of 795 new dwelling units. Single-family detached dwellings account for more than 92% of the permit activity. Duplexes and 3-4 plex family dwellings make up the remaining 8%. No single-family attached dwellings or apartments were approved during this period. This information complements the ECONorthwest analysis and provides a more complete indication of remaining buildable lands within the existing urban growth boundary.

The proposed Far West UGB expansion would amend the Redmond Urban Growth Boundary (UGB) to include 133 acres for residential development. The proposed boundary expansion would have the following residential land capacity based on average density targets. The expansion would accommodate approximately 773 dwelling units of the 7701 dwelling unit need.

The ECONorthwest housing needs analysis and the other information contained in and with this findings document identified a need for a UGB expansion of 589 gross acres in the RG designation (the R-2, R-3 and R-4 zones) and 344 gross acres in the RH designation (the R-5 zone) to meet identified housing needs for 2025. Adjusting these numbers to target a August 16, 2006 planning period increases the amount of needed RG lands from 589 gross acres to about 639 gross acres. The amount of needed RH lands is increased from 344 gross acres to about 374 gross acres. The proposed UGB expansion would meet a portion of the identified need. Two other expansions in the West and North Area of the urban reserves and the Northwest area of the urban reserve would fulfill the remaining need.

Expanding the UGB to the Far West Area helps achieve community aspirations and goals as articulated in *Visioning Redmond* (2005). The intersection of Helmholtz Way and Obsidian Avenue is envisioned as one of a handful of Centers to be developed in Redmond. Centers denote:

- higher density development as you move towards the heart of the Center;
- a mix of land uses, including commercial, institutional, residential, and public space; and
- opportunities to travel by means other than driving.

The Far West Expansion Area includes the north west quadrant of Helmholtz/Obsidian intersection. Accordingly, the proposed High Density Residential designation for part of the UGB

expansion, which is on the perimeter of the future center at Helmholtz Way and Obsidian Avenue, helps achieve the objective of locating higher density development in close proximity to centers to provide a nearby customer base for future commercial development.

*Boundary Location*

*The location of the urban growth boundary and changes to the boundary shall be determined by evaluating alternative boundary locations consistent with ORS 197.298 and with consideration of the following factors:*

*(1) Efficient accommodation of identified land needs*

Response: The proposed UGB expansion is driven by the need for housing. If sufficient housing is not provided in Redmond, people working or accessing services in Redmond may be forced to live in other communities and drive into the city for work and services. This will negatively impact the city with increased congestion and air pollution. Alternative boundary locations have been considered as part of this planning process and the Far West UGB Expansion Area is recommended at this time to meet a residential lands shortfall in the City of Redmond. This location has been chosen for more immediate urbanization than other areas within the URAs because it requires the least amount of additional infrastructure and the fact that the City's long-range planning better anticipates the urbanization of this area over other areas considered as part of the alternatives analysis done for the proposed amendment. Specifically, this area can be served by extending existing sewer lines in the public street grid, requires no major new sewer facilities, and will have less impact to the existing transportation system.

**Including the Far West Expansion Area into the city of Redmond Urban Growth Boundary is a logical extension of the existing development pattern and serves to further the tenants of Goal 14 for several reasons.**

**The most apparent, if not the best reason, that the Far West Expansion Area is a logical extension of the city's urban growth boundary is the tale told by the map. This portion of the Redmond Urban Reserve Area helps complete the picture. Failing to include the Far West Expansion Area creates an unexpected gap in the design of the city. Including the Far West Expansion Area creates a fuller, more complete urban growth area as it helps to tie the northern lands to the southern lands.**

**The city is growing to the west. This is where the physical and social infrastructure is most readily available to support development. The city's principal off highway transportation routes, the established and new residential settlement patterns and new commercial opportunities like the Nolan Town Center are pushing development towards Helmholtz Way. This portion of the city has excellent access to the existing school system and several local parks. Several new subdivisions are butting up against the east side of Helmholtz Way and more are planned for the immediate future.**

**The Far West Expansion Area is at the western center of the city's west side Urban Reserve Area, which assists the city to distribute development and traffic evenly across the westside transportation corridor. It is the ideal location to anchor the urban growth boundary on the city's west side. The Far West Expansion Area will help distribute development and trips along the westside transportation corridor because about one-half**

of the newly designated urbanizable lands will be located to the north, including the North West Expansion Area. To the south will be the other one-half of the newly designated urbanizable lands, including the proposed new High School site. Furthermore, the Far West Expansion Area will join with the lands south of Obsidian Avenue, the “Texas” area, to round out the land base and provide a strong pool of development opportunities west of Helmholtz Way.

Balancing the land base helps maximize residential, commercial and employment opportunities for the citizens of Redmond. Providing an adequate land base to furnish a variety of choices across multiple disciplines and income levels is critical to the success of an urban area. The Far West Expansion Area is ideally located to balance the Planned Unit Developments envisioned for the east of Helmholtz Way with quality development on the west side of Helmholtz Way. Promoting quality development on both sides of the westside transportation corridor will result in a more complete community. The Far West Expansion Area increases opportunities for a complete community.

Maximizing urban efficiencies is an important component of successful urban areas. The provision of urban services is a very expressive proposition. Constructing an urban roadway, including right-of-way acquisition often exceeds one million dollars per mile. Extending sewer lines sized to serve local neighborhoods often exceeds ninety dollars per foot. The westside interceptor sewer line will be much larger and much more expensive than a common sewer lateral. Timing development with the delivery of services helps reduce the costs to the taxpayers by presenting the development community with the costs of growth.

The Far West Expansion Area is ideally located to take advantage of the west side interceptor as it is constructed in or near the Helmholtz Way right-of-way. Extending into this area is logical because it provides the most development potential along new infrastructure corridors. Excluding the Far West Expansion Area would extend development and the costs of development, right by an eligible area that can help maximize the return on infrastructure investment. Land to the east and to the south will benefit from the Far West Expansion Area through partnership opportunities and possible cost sharing strategies. The Far West Expansion Area allows the city to capitalize on the presence of sewer and it will assist in extending the needed infrastructure to other lands along the corridor.

The city has identified the creation of the westside transportation corridor as a high priority for this project. The Far West Expansion Area fronts on Helmholtz Way for an entire mile. Having both sides of Helmholtz Way in the urban growth boundary can assist in the conversion of this road way from a rural collector to an urban boulevard. Concurrent development opportunities on either side of Helmholtz will facilitate right-of-way acquisition and road construction. Without the Far West Expansion Area it is not certain how this segment of the westside transportation corridor might be completed.

The Far West Expansion Area represents a logical expansion of the city's urban growth boundary and constitutes good urban form because it provides uniform development opportunities entirely around two key intersections.<sup>6</sup> The first intersection, Hwy 126 and Helmholtz Way is the most critical intersection of all the lands being brought into the urban growth boundary. It is also the most dangerous with a history of accidents that have resulted in injuries and fatalities. The entire western half of this intersection resides in the Far West Expansion Area. The Hwy 126/Helmholtz intersection is expected to become the most important intersection on the city's west side. No other intersection is planned to move full urban traffic flows traveling at speed across a state highway whose mission it is to move people, goods and services.

The second intersection, Helmholtz Way and Obsidian Avenue is located exactly one half mile south of the Hwy 126/Helmholtz Intersection. Coincidentally, this happens to be about the exact distance it takes for modern vehicles to reach a traveling speed of 55-60 mph as they come out of the northern intersection crossing Hwy 126. The northwest quadrant of the Helmholtz/Obsidian intersection resides in the Far West Expansion Area. The facility at Helmholtz and Obsidian will need to be capable of responding to the high speed north-south traffic and safely accommodate traffic traveling east and west. The east-west traffic movement on Obsidian Avenue currently includes school buses, bicyclists, pedestrian and children. Although it is unavoidable that vehicular traffic will become more pronounced the mix of users is not expected to diminish.

Obsidian Avenue, as it exists west of Helmholtz Way will also be responsible for carrying many of the trips generated by the Kestrel Development and other projects planned for those lands lying west of Helmholtz Way, between Obsidian Avenue and Wickiup Avenue. This particular segment of Helmholtz Way is characterized by sharp curves that limit the number of new access points that may be safely established. Fewer outlets directly onto Helmholtz place a greater level of importance on Obsidian Avenue, which is currently substandard, and the Helmholtz/Obsidian intersection.

Including both of these important intersections entirely in the city's urban growth boundary will allow the city to manage land uses in a way that will productively compliment the transportation facilities and allow development to happen in an orderly fashion. The development planned for around these intersections should protect the function and integrity of the transportation facilities while also taking advantage of the position near traffic flows. It is more likely that the right type of development will happen if all quadrants of the intersections are equal in terms of their development potential. Development tends to be drawn towards locations where similar types of development are likely to occur. The proximity to other activities benefits all of the projects. This is known as agglomeration and it is why clusters of similar activities are so popular.

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<sup>6</sup> The Helmholtz Way/Antler Avenue intersection is the third key intersection along this section of the Westside transportation corridor. The southwest quadrant of this intersection resides in the northern most portion of the Far West Expansion Area. The northwest quadrant falls outside of the Redmond Urban Reserve Area and is not currently available to be considered for inclusion in the city's urban growth boundary.

**If the development potential of all the quadrants of the intersections are not equal it will be difficult to establish a common and accepted expectation of what will occur. This uncertainly can cause potential investors to pause and look elsewhere. A staggered development scenario resulting from some lands being in the ugb and other lands being left outside the ugb is not as likely to produce the desired results. Encouraging a pedestrian scale mixed-use neighborhood around one-half of an intersection is not as appealing as extending that neighborhood to both sides of the intersection, taking full advantage of blending of transportation and other activities. Almost every single community has grown up around some sort of a transportation feature. Often this has been a simple crossroads that became a hamlet that was later a village that grew to be a town and finally matured into a city. This type of community evolution was able to occur because the potential for growth was evenly distributed rather than available at some locations and inhibited at others. Successful intersections, urban intersections that work, have equal development potential.**

**To summarize, the Far West Expansion Area can efficiently accommodate the identified land needs and it is a logical and natural extension of the city of Redmond urban growth boundary for four reasons. First, including the Far West Expansion Area makes good sense visually and intuitively. Any reasonable person looking at the ugb map would be surprised to see that this area was excluded. Second, the Far West Expansion Area is in the path of progress and meets existing trends for residential and commercial development. Development is rolling out to meet this area, which can smoothly convert from a rural residential exception status. Third, the Far West Redmond Expansion Area is ideally located to be served by the westside sewer interceptor and to assist in the creation of the westside transportation corridor. This allows the maximum amount of development to participate in these important infrastructure projects. Fourth, the Far West Expansion Area can help facilitate good urban form by including all of the land around two key intersections. Successful urban intersections involve quality development on all quadrants. All in all, the material provided above shows that the Far West Expansion Area has more to offer the city as urbanizable land than it does as rural land.**

*(2) Orderly and economic provision of public facilities and services;*

Response: URAs encompass approximately 5,664 total acres. The western most portions of the URAs consistently received higher overall ratings for sewer, water, and storm serviceability in OTAK's Urban Reserve studies<sup>7</sup>. These areas also rated favorably in the *Conceptual URA and Northwest Neighborhood Sewer/Water 2005 Study* prepared by David Evans & Associates in June, 2005. When the city completes the Phase 2 UGB expansion, it will use information from these technical reports to craft an orderly expansion strategy.

The 20-year residential land need is estimated to be 2,095 acres and, of that, approximately 1,149 acres needs to be added to the UGB. In addition, acreage needs for neighborhood commercial uses

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<sup>7</sup> Table B-2 in Appendix B (Urban Reserve Study Areas Evaluation Worksheets) of *Redmond Urban Reserve Analysis* memo, June 30, 2003

and for public and semi-public uses also need to be added to the UGB. The UGB expansion is being divided into two phases in response to service capacity limitations:

- Phase 1 - 401 acres in the Northwest Area; and
- Phase 2 - 1,700 acres in the West and North Areas of the urban reserves and 168.50 acres in the Far West Area of the urban reserve.

Phase 1 targets the northwest portion of the URA for initial UGB expansion primarily due to the "orderly and efficient" provision of public services that are possible here. Existing and imminent water, sewer, and transportation system capacity can support the 360 gross acres and 1594 housing units proposed in the Northwest Expansion Area. Gravity-flow sewer Line "D", running along the western edge of Redmond, has conveyance and treatment capacity for approximately 1,700 homes.<sup>8</sup> The area is being served by the West Side Sewer Interceptor Project (WSSIP), and the Water Pollution Control Facility (WPCF) on the northern edge of Redmond is being expanded from treating 2.99 million gallons daily (MGD) to 3.55 MGD.<sup>9</sup>

In terms of drinking water, new wells and reservoirs will be needed to serve all subareas of the URA, and this service investment need does not necessarily recommend one subarea over another.

Similarly, all subareas will need to undergo significant transportation improvements in order to serve urban-scale development. A new bridge across Dry Canyon on Maple Avenue is due to be completed in December 2006, which will provide a significant benefit to the proposed Phase 1 UGB expansion area. Initially expanding the UGB in this northwestern URA (within the subarea formerly referred to as W-2 earlier in the Urban Reserve Project) also avoids traffic impacts on Highway 97 and Highway 126 that will need to be mitigated when the UGB is expanded into the URA subareas formerly referred to as N-1, S-2, and W-1.

*(3) Comparative environmental, energy, economic and social consequences; and*

Response: The environmental, energy, economic, and social consequences for future urban expansion were studied in general terms as part of the Redmond URA analysis. The proposed UGB expansion is driven by the need for housing. This area can be efficiently served by City water, sewer and transportation facilities and provides the opportunity for housing to be located close to core urban services and places of employment. The proximity of housing to other urban uses can result in shortened travel times and less vehicle-miles traveled can decrease pollution and congestion.

Expanding the UGB to the Far West is also part of a vision to create neighborhood centers within the City of Redmond so that not all commercial activity is concentrated along the highways. Neighborhood centers will have a mix of uses and will provide the opportunity for residents to choose alternative modes to driving -- walking, biking, taking transit -- in order to get to services that otherwise could only be accessed by car. Allowing for these transportation choices will minimize the

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<sup>8</sup> In a memo dated November 26, 2003, the City of Redmond Engineering Department reports that its Westside Sewer Interceptor/Line D has capacity for 1,715 housing units (1,250 gallons per minute (gpm) at 0.729 gpm per dwelling unit).

<sup>9</sup> According to Wastewater Collection and Constraints sections of DEA's June 2005 memo, the following areas will require pumping: the north half of N-2; the north edge of N-1; east edge of E-1; the south edges of the URA subareas south of Forked Horn Butte; and the west edges of URAs W-1, W-2 and W-3.

air and water pollution associated with vehicle emissions, and is intended to slow down the demand for road building and widening that consumes land.

There are no natural surface water features in the vicinity of the proposed Far West Area expansion. The City of Redmond has developed a groundwater protection program to minimize adverse impacts of urban development on groundwater resources, particularly from the infiltration of stormwater runoff into the ground. No adverse impacts to water resources are anticipated from the proposed action.

The proposed UGB expansion is founded on the need for housing. If sufficient housing is not provided in Redmond, then people working or accessing services in Redmond may be forced to live in other communities and drive into the city for work and services, unnecessarily driving up fuel and energy usage in the city. Insufficient housing in Redmond may also lead to haphazard, "release valve" development patterns in neighboring communities that are not able to capitalize on existing public facilities and infrastructure the way that Redmond is and, therefore, is much less efficient.

Expanding the UGB to the Far West is also part of a vision to create more neighborhood centers around the City of Redmond so that not all commercial activity is concentrated along the highways. More neighborhood centers will provide the opportunity for residents to choose means other than driving alone -- walking, biking, taking transit -- in order to get to services that otherwise could only be accessed by car. Allowing for these transportation choices will minimize fuel and energy usage associated with vehicle emissions.

Including the Far West Expansion Area carries a clear social benefit because it will enable a maximum amount of existing residents to participate in the city's growth. The residents of the Far West Expansion Area are not big developers with numerous projects occurring inside and out of the central Oregon region. Instead, they are citizens and tax payers who have supported community events and the Redmond School District for generations. The citizens of the Far West Area have sent their kids to Redmond Schools where they played high school basketball on state ranked teams and rodeo'd when the Redmond Rodeo Team won the state championship every year. The citizens in this area have helped their neighbors and they have serviced in our nations armed services. They have made their home in the Redmond Community for many, many years and they have never apologized for being from Redmond or coming from Deschutes County. The citizens in the Far West Expansion Area have never, ever been anything but proud to live in Redmond, Oregon.

*(4) Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB.*

Response: The proposed Far West UGB Expansion Area is a rural residential exception area zoned MUA-10 by Deschutes County. Designation of the area as an URA makes it the highest priority for urbanization, per ORS 197.298.

*Goal 15 Willamette River Greenway*

Response:

The Willamette River is located in the Willamette Valley of western Oregon. No portion of the Willamette River Greenway is located in or near the city of Redmond or Deschutes County. Therefore, statewide planning goal 15 does not apply.

*Goal 16 Estuarine Resources*

Response:

Goal 16 is considered a coastal goal, specific to jurisdictions along on the Oregon Coast. Neither the city of Redmond nor Deschutes County is located along the Oregon Coast. Therefore, statewide planning goal 16 does not apply.

*Goal 17 Coastal Shorelands*

Response:

Goal 17 is considered a coastal goal, specific to jurisdictions along on the Oregon Coast. Neither the city of Redmond nor Deschutes County is located along the Oregon Coast. Therefore, statewide planning goal 17 does not apply.

*Goal 18 Beaches and Dunes*

Response:

Goal 18 is considered a coastal goal, specific to jurisdictions along on the Oregon Coast. Neither the city of Redmond nor Deschutes County is located along the Oregon Coast. Therefore, statewide planning goal 18 does not apply.

*Goal 19 Ocean Resources*

Goal 19 is considered a coastal goal, specific to jurisdictions along on the Oregon Coast. Neither the city of Redmond nor Deschutes County is located along the Oregon Coast. Therefore, statewide planning goal 19 does not apply.

#### **IV. CONFORMANCE WITH LOCAL PLANNING PROGRAMS**

Discussion: Local planning programs often have additional criteria applicable to a comprehensive plan amendment that serve to supplement state law. All relevant state and local criteria must be identified and adequately addressed. Local jurisdictions enjoy the ability to interpret their own planning programs. However, the jurisdictions are not entitled to a limitless amount of deference. Please see *Clark v. Jackson County*, 313 Or 508, 836 P2d 710 (1992) and ORS 197.829.

Local criteria are most often located in a city or county Development Code and/or in a city or county comprehensive plan. Comprehensive Plan provisions constitute approval criteria when the local code or comprehensive plan identifies them as approval standards. Use of the term “shall” has been interpreted by the courts as clear identification that a plan policy is an approval standard.

(comprehensive plan policy that “services shall be available or committed prior to approval of development” is mandatory approval standard. *Axon v. City of Lake Oswego*, 20 Or LUBA 108, 114-115 (1990)).

City of Redmond Development Code

Section 8.0760 of the Redmond Development Code contains the applicable criteria for an amendment to the text of the Development Code standards or to a zoning or plan map. Pursuant to Section 8.076, the applicant shall show the proposed change is:

*(1) In conformity with all applicable state statutes.*

Response:

The Far West Expansion Area is in conformity with all applicable state statutes because ORS 197.298 identifies lands in an urban reserve has having the highest priority to be included in an urban growth boundary. The Far West Expansion Area is included in the Redmond Urban Reserve Area.

*(2) In conformity with the State-wide planning goals when they are determined to be applicable*

Response:

The Far West Expansion Area is in conformity with the state-wide planning goals because all applicable goals have been identified and addressed earlier in this report. Please see Section III “Conformance with Statewide Planning Goals” above for a detailed response to goals 1,2,3,5,6,7,8,9,10,11,12,13 and 14. Because Section III demonstrates conformance with the applicable statewide planning goals the city finds no need to repeat that language in its entirety here. Instead, the city hereby incorporates the responses in Section III into addressing this code criterion. Statewide planning goal 4 (*Forest Lands*) does not apply because no forest land is affected by the urban growth boundary expansion project. Statewide planning goal 15 does not apply because no portion of the Willamette River Greenway is located in or near the city of Redmond or Deschutes County. Statewide planning goals 16 thru 19 are not applicable to this project because they apply exclusively to the Oregon Coast.

*(3) In conformity with the Redmond Comprehensive Plan, land use requirements and policies; and*

Response:

The Far West Expansion Area is in conformity with the Redmond Comprehensive Plan, land use requirements and policies because the applicable comprehensive plan provisions are identified and addressed below. For ease of reading and formatting consistencies the city has chosen to dedicate a distinct area to the Redmond 2020 Comprehensive Plan. Because the Redmond 2020 Comprehensive Plan has its own heading below and the associated language demonstrates conformance with the applicable comprehensive plan provisions the city finds no need to repeat that language in its entirety here. Instead, the city hereby incorporates the responses included under the heading Redmond 2020 Comprehensive Plan into addressing this code criterion

(4) That there is a change of circumstances or further studies justifying the amendment or mistake in the original zoning.

Response:

The Far West Expansion Area satisfies this criterion because there is clearly a change of circumstances and further studies justify the amendment. There has been a change in circumstances because the city of Redmond and Deschutes County have experienced unprecedented growth that was not anticipated by the Redmond 2020 Comprehensive Plan. Furthermore, several studies justify the amendment. These studies include:

- Visioning Redmond, City of Redmond Design and Vision 2005, prepared by Angelo Eaton & Associates, ECONorthwest, HDR, and David Evans & Associates
- *Redmond Urban Reserve Analysis* memo, prepared by OTAK, June 30, 2003
- *Draft Urban Reserve Findings*, prepared by OTAK, January 14, 2005
- *Revised 2050 Population Forecast* memo, prepared by ECONorthwest, August 13, 2004
- *Redmond Urbanization Report*, prepared by ECONorthwest and Angelo Eaton & Associates, June 2005 (See Attachment 6)
- *Building Permit Information*, provided by the city of Redmond
- *Technical Memorandums*, provided by the city Public Works Department

The Redmond Urban Reserve Analysis identifies the portion of the Urban Reserve Area that includes the Far West Expansion Area as having an outstanding potential for urban development and gives these lands the highest overall rating based on a variety of important factors including: transportation, infrastructure, schools and parks.

#### Redmond 2020 Comprehensive Plan

The city's Agricultural Land Element (Chapter 3), Policies state:

1. Conversion of rural agricultural land to urbanizable land shall be based on the following factors:<sup>10</sup>
  - a) *Environmental, energy, social and economic consequences;*

Response:

The Far West Expansion Area includes no negative environmental, energy, social and economic consequences for the following reasons:

There are no inventoried environmental resources or naturally occurring water bodies located in the Far West Expansion Area.

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<sup>10</sup> Statewide planning goals define "rural land" as land located outside of an urban growth boundary and "urbanizable lands" as lands located inside an urban growth boundary. OAR 660-033-0020(1) defines "agricultural land" as among other things, not including lands in acknowledged exception areas and urban growth boundaries. In the absence of a different local definition for these terms the city concludes that the plan policies in Chapter 3 of the comprehensive plan apply to converting agricultural lands outside of the urban growth boundary to urbanizable lands inside the urban growth boundary.

The proposed UGB expansion is driven by the need for housing. This area can be efficiently served by City water, sewer and transportation facilities and provides the opportunity for housing to be located close to core urban services and places of employment. The proximity of housing to other urban uses can result in shortened travel times and less vehicle-miles traveled can decrease pollution and congestion.

Expanding the UGB to the Far West is also part of a vision to create neighborhood centers within the City of Redmond so that not all commercial activity is concentrated along the highways. Neighborhood centers will have a mix of uses and will provide the opportunity for residents to choose alternative modes to driving -- walking, biking, taking transit -- in order to get to services that otherwise could only be accessed by car. Allowing for these transportation choices will minimize the air and water pollution associated with vehicle emissions, and is intended to slow down the demand for road building and widening that consumes land.

Including the Far West Expansion Area carries a clear social benefit because it will enable a maximum amount of existing residents to participate in the city's growth. The residents of the Far West Expansion Area are not big developers with numerous projects occurring inside and out of the central Oregon region. They can't just move on to another project in another city. Instead, they are citizens and tax payers who have supported community events and the Redmond School District for generations. The citizens of the Far West Area have sent their kids to Redmond Schools where they played high school basketball on state ranked teams and rodeo'd when the Redmond Rodeo Team won the state championship every year. The citizens in this area have helped their neighbors and they have serviced in our nations armed services. They have made their home in the Redmond Community for many, many years and they have never apologized for being from Redmond or coming from Deschutes County. The citizens in the Far West Expansion Area have never, ever been anything but proud to live in Redmond, Oregon. For all of the reasons stated in the paragraph, not including the Far West Expansion Area would have a negative social consequence.

As fuel costs continue to escalate the prices of food and fiber will also increase, particularly when these goods are shipped from distant locations. If this trend does not level off it may become increasingly important that urban areas retain an adequate amount of nearby irrigated farmland to produce commodities for the local market. The farmlands around Redmond have historically been used for crop, livestock and dairy production. Although some of the more intensive agricultural practices have subsided commercial farm operations continue to be present. Past practices can become revitalized and could become more important to the ability to provide affordable food to the citizens of Redmond and Deschutes County and to improve the local agricultural economy.

b) *Demonstrated need consistent with LCDC goals*

Response:

There is a demonstrated need to accommodate urban population growth requirements because population numbers to extend the planning period for a full 20 years commencing on August 16, 2006 are based on the city of Redmond Urban Reserve findings that have been adopted by both the city and Deschutes County and acknowledged by the Land Conservation and Development Commission (LCDC).

c) *Unavailability of an alternative suitable location for the requested use;*

Response:

The Far West Expansion Area is a rural residential exception area. This means that Deschutes County has made a determination that the area is “irrevocably committed” to uses other than commercial agriculture. Therefore, the Far West Expansion Area is not considered agricultural land as that term is defined by Goal 3 and OAR 660-033-0020(1) and is not protected by Goal 3.

More important regarding compliance with this criterion, including the Far West Expansion Area guarantees that the city has selected the maximum amount of nonagricultural lands while maintaining the most efficient configuration of urban development possible. Including the Far West Expansion Area is critical to this overall Urban Growth Boundary expansion project because it provides certainty that agricultural lands protected under Goal 3 remain available for resource uses at other rural locations around the city. The Far West Expansion Area also serves to balance the agricultural lands that have been necessary to be included in the Northwest and North & West Expansion Areas.

d) *Compatibility of the proposed use with related agricultural land; and*

Response:

The proposed Far West UGB Expansion Area is a rural residential exception area zoned MUA-10 by Deschutes County. Designation of the area as an URA makes it the highest priority for urbanization, per ORS 197.298.

e) *The retention of Class I, II, III, IV soils in farm use.*

Response:

The soil survey for the Deschutes Area was originally prepared by the USDA Soil Conservation Service (SCS), which has gone on to become the Natural Resource Conservation Service (NRCS). The maps included in the Deschutes Area Soil survey show that much of the land surrounding the city of Redmond is considered Deschutes Sandy Loam. Additional information provided by the NRCS identifies that Deschutes Sandy Loam has an agricultural capability Class III when irrigated and is considered a prime agricultural soil. When Deschutes Sandy Loam is not irrigated it has an agricultural capability class VI and is not considered a prime agricultural soil. Redmond Sandy Loam is another soil that is present in more limited quantities and is considered class III soil and therefore prime when irrigated and class VI when not irrigated.

The map included on page 98 of the 1979 Deschutes County Comprehensive Plan Resource Element shows that nearly all of the land near Redmond, west of Hwy 97 is included in an irrigation district. Judging from the map, it appears that the only portion of this area not included in the irrigation district is on and immediately around Forked Horn Butte. Tracts comprised of prime soil are considered "high-value farmland" pursuant to ORS 215.710

The Far West Expansion Area is a rural residential exception area. This means that Deschutes County has made a determination that the area is “irrevocably committed” to uses other than

commercial agriculture. Therefore, the Far West Expansion Area is not considered agricultural land as that term is defined by Goal 3 and OAR 660-033-0020(1) and is not protected by Goal 3.

More important regarding compliance with this criterion, including the Far West Expansion Area guarantees that the city has selected the maximum amount of nonagricultural lands while maintaining the most efficient configuration of urban development possible. Including the Far West Expansion Area is critical to this overall Urban Growth Boundary expansion project because it provides certainty that agricultural lands protected under Goal 3 remain available for resource uses at other rural locations around the city. The Far West Expansion Area also serves to balance the agricultural lands that have been necessary to be included in the Northwest and North & West Expansion Areas.

The city's Urbanization Element (Chapter 14), Policies state:

3. To establish or change the Urban Growth Boundary, the following factors must be considered:
  - a) *Demonstrated need to accommodate urban population growth requirements;*

Response:

There is a demonstrated need to accommodate urban population growth requirements because population numbers to extend the planning period for a full 20 years commencing on August 16, 2006 are based on the city of Redmond Urban Reserve findings that have been adopted by both the city and Deschutes County and acknowledged by the Land Conservation and Development Commission (LCDC).

As part of the Urban Reserve project the city and county have projected that Redmond will have a population of 78,777 by the year 2050. This same document shows that the city can expect a population of 45,724 by the year 2025 and 50,733 by the year 2030. The adopted population figures demonstrate that the city of Redmond can expect a population of 46,867 by the year 2026 and a population of 48,039 by the year 2027. Because the date of commencement does not fall exactly on January 1 of either year it is necessary to extrapolate the target number from these figures. Tracking the expected population growth on a monthly basis for 2026 produces a target population of 47,595 for the planning period commencing on August 16, 2006 and concluding on August 16, 2026.

- b) *Need for housing, employment opportunities and livability;*

Response:

The need for housing, employment opportunities and livability has been satisfied because the city's urban growth boundary expansion proposal specifically accounts for residential lands, employment opportunities including a variety of both commercial and industrial categories and livability issues such as parks and the orientation of land uses. These items are addressed in detail in the city's response to statewide goals 5,8,9,10 and 14 found in Section III of this report. Because Section III demonstrates conformance with the issues of housing, employment and livability and the applicable statewide planning goals that address these items, the city finds no

need to repeat that language in its entirety here. Instead, the city hereby incorporates the responses in Section III into addressing this comprehensive plan policy.

c) *Orderly and economic provisions of public facilities and services;*

Response:

An orderly and economic provision of public facilities and services can be offered to the Far West Redmond Expansion Area because of several reasons. The area can be served by gravity sewer. The area is adjacent to the alignment of the west side interceptor sewer line that will enable development on the west side of Redmond. The area is close to existing schools. The area can assist in the needed transportation improvements on Helmholtz Way and at critical intersections along Helmholtz Way, including the intersection of Helmholtz Way and Hwy 126, which is the most important intersection along this transportation corridor. In addition, including the Far West Expansion Area will bring in all of Obsidian Avenue as it exists west of Helmholtz Way. Improving Obsidian Avenue will become necessary to develop lands to the southwest of the Helmholtz/Obsidian intersection and additional r-o-w along this road way will prove critical to providing the necessary transportation and other infrastructure for all of the lands in this vicinity, as well as placing existing utilities underground.

d) *Maximum efficiency of land uses;*

Response:

Including the Far West Expansion Area satisfies the requirement for the maximum efficiency of land uses because it is already a rural residential exception area so growth is being focused in an area that some development already exists rather than introducing urban development into other areas that have no existing settlement pattern. Also, enabling development in this portion of the Redmond URA allows maximum access to the transportation and infrastructure corridors planned for the west side of the city that will result in maximum urban efficiencies. Furthermore, the Far West Expansion Area avoids unnecessary gaps between the urban growth boundary and the boundary of the URA.

Running all of the anticipated infrastructure right past the Far West Expansion Area and promoting urban development all around it while retaining the area as rural land would not be the maximum efficiency of land use. To the contrary, running the west side interceptor and improving Helmholtz Way directly adjacent to the Far West Expansion Area but not allowing the area to develop would be an inefficient use of land.

e) *Retention of agricultural land;*

Response:

It is clear that the city of Redmond, Deschutes County and the state of Oregon have a highly developed culture of protecting agricultural areas for crop and livestock production. In fact, farm land protection and exclusive farm use zoning is a hallmark of the Oregon planning system. Another Oregon hallmark is the requirement for cities and counties to adopt urban growth boundaries pursuant to Goal 14.

The soil survey for the Deschutes Area was originally prepared by the USDA Soil Conservation Service (SCS), which has gone on to become the Natural Resource Conservation Service (NRCS). The maps included in the Deschutes Area Soil survey show that much of the land surrounding the city of Redmond is considered Deschutes Sandy Loam. Additional information provided by the NRCS identifies that Deschutes Sandy Loam has an agricultural capability Class III when irrigated and is considered a prime agricultural soil. When Deschutes Sandy Loam is not irrigated it has an agricultural capability class VI and is not considered a prime agricultural soil. Redmond Sandy Loam is another soil that is present in more limited quantities and is considered class III soil and, therefore, prime when irrigated and class VI when not irrigated.

A chart entitled "High-Value Farmland Soils" has been developed by the Department of Land Conservation and Development in consultation with the NRCS. This chart has been included as part of Attachment 8 and shows that the Deschutes Area includes no inventoried class I soils and very few, if any, inventoried class II soils. Therefore, irrigated class III soils constitute the most productive farmlands Deschutes County has to offer.

The map included on page 98 of the 1979 Deschutes County Comprehensive Plan Resource Element shows that nearly all of the land near Redmond, west of Hwy 97 is included in an irrigation district. Judging from the map, it appears that the only portion of this area not included in the irrigation district is on and immediately around Forked Horn Butte. Tracts comprised of prime soil are considered "high-value farmland" pursuant to ORS 215.710

As fuel costs continue to escalate the prices of food and fiber will also increase, particularly when these goods are shipped from distant locations. If this trend does not level off it may become increasingly important that urban areas retain an adequate amount of nearby irrigated farmland to produce commodities for the local market. The farmlands around Redmond have historically been used for crop, livestock and dairy production. Although some of the more intensive agricultural practices have subsided commercial farm operations continue to be present. Past practices can become revitalized and could become more important to the ability to provide affordable food to the citizens of Redmond and Deschutes County.

The Far West Expansion Area is a rural residential exception area. This means that Deschutes County has made a determination that the area is "irrevocably committed" to uses other than commercial agriculture. Therefore, the Far West Expansion Area is not considered agricultural land as that term is defined by Goal 3 and OAR 660-033-0020(1) and is not protected by Goal 3.

More important regarding compliance with this criterion, including the Far West Expansion Area guarantees that the city has selected the maximum amount of nonagricultural lands while maintaining the most efficient configuration of urban development possible. Including the Far West Expansion Area is critical to this overall Urban Growth Boundary expansion project because it provides certainty that agricultural lands protected under Goal 3 remain available for resource uses at other rural locations around the city. The Far West Expansion Area also serves to balance the agricultural lands that have been necessary to be included in the Northwest and North & West Expansion Areas.

f) *Compatibility of urban uses with nearby agricultural activities;*

Response:

The proposed Far West UGB Expansion Area is a rural residential exception area zoned MUA-10 by Deschutes County. Designation of the area as an URA makes it the highest priority for urbanization, per ORS 197.298.

g) *Environmental, energy, economic and social consequences; and*

Response:

The environmental, energy, economic, and social consequences for future urban expansion were studied in general terms as part of the Redmond URA analysis. The proposed UGB expansion is driven by the need for housing. This area can be efficiently served by City water, sewer and transportation facilities and provides the opportunity for housing to be located close to core urban services and places of employment. The proximity of housing to other urban uses can result in shortened travel times and less vehicle-miles traveled can decrease pollution and congestion.

Expanding the UGB to the Far West is also part of a vision to create neighborhood centers within the City of Redmond so that not all commercial activity is concentrated along the highways. Neighborhood centers will have a mix of uses and will provide the opportunity for residents to choose alternative modes to driving -- walking, biking, taking transit -- in order to get to services that otherwise could only be accessed by car. Allowing for these transportation choices will minimize the air and water pollution associated with vehicle emissions, and is intended to slow down the demand for road building and widening that consumes land.

There are no natural surface water features in the vicinity of the proposed Far West Area expansion. The City of Redmond has developed a groundwater protection program to minimize adverse impacts of urban development on groundwater resources, particularly from the infiltration of stormwater runoff into the ground. No adverse impacts to water resources are anticipated from the proposed action.

The proposed UGB expansion is founded on the need for housing. If sufficient housing is not provided in Redmond, then people working or accessing services in Redmond may be forced to live in other communities and drive into the city for work and services, unnecessarily driving up fuel and energy usage in the city. Insufficient housing in Redmond may also lead to haphazard, "release valve" development patterns in neighboring communities that are not able to capitalize on existing public facilities and infrastructure the way that Redmond is and, therefore, is much less efficient.

Expanding the UGB to the Far West is also part of a vision to create more neighborhood centers around the City of Redmond so that not all commercial activity is concentrated along the highways. More neighborhood centers will provide the opportunity for residents to choose means other than driving alone -- walking, biking, taking transit -- in order to get to services that otherwise could only be accessed by car. Allowing for these transportation choices will minimize fuel and energy usage associated with vehicle emissions.

Including the Far West Expansion Area carries a clear social benefit because it will enable a maximum amount of existing residents to participate in the city's growth. The residents of the Far

West Expansion Area are not big developers with numerous projects occurring inside and out of the central Oregon region. They can't just move on to another project in another city. Instead, they are citizens and tax payers who have supported community events and the Redmond School District for generations. The citizens of the Far West Area have sent their kids to Redmond Schools where they played high school basketball on state ranked teams and rodeo'd when the Redmond Rodeo Team won the state championship every year. The citizens in this area have helped their neighbors and they have serviced in our nations armed services. They have made their home in the Redmond Community for many, many years and they have never apologized for being from Redmond or coming from Deschutes County. The citizens in the Far West Expansion Area have never, ever been anything but proud to live in Redmond, Oregon. For all of the reasons stated in the paragraph, not including the Far West Expansion Area would have a negative social consequence.

b) *Establishment and change of the UGB shall be a cooperative process between the city and county.*

Response:

The change of the UGB shall be a cooperative process between the city and the county because a joint hearing with the city and county planning commissions will be held and the planning commission hearing(s) will be followed by a joint hearing of the city council and the board of county commissioners.

Deschutes County Code, Title 22 County Development Procedures

The Deschutes County Code does not include specific criteria for a legislative plan amendment.

Deschutes County Code, Title 23 Comprehensive Plan

The county's urbanization element is located in Chapter 23.48 of the Deschutes County Comprehensive Plan. This portion of the county plan was updated in December of 2005.

The county's urban growth boundary policies are found at Section 23.48.030. The relevant language is as follows:

1. Urbanization...
- b. Urban growth boundaries shall be established or expanded based upon the following: (emphasis added)
  1. *Demonstrated need to accommodate long-range urban population growth requirements consistent with LCDC Goals;*

Response:

There is a demonstrated need to accommodate urban population growth requirements because population numbers to extend the planning period for a full 20 years commencing on August 16, 2006 are based on the city of Redmond Urban Reserve findings that have been adopted by both the city and Deschutes County and acknowledged by the Land Conservation and Development Commission (LCDC).

As part of the Urban Reserve project the city and county have projected that Redmond will have a population of 78,777 by the year 2050. This same document shows that the city can expect a population of 45,724 by the year 2025 and 50,733 by the year 2030. The adopted population figures demonstrate that the city of Redmond can expect a population of 46,867 by the year 2026 and a population of 48,039 by the year 2027. Because the date of commencement does not fall exactly on January 1 of either year it is necessary to extrapolate the target number from these figures. Tracking the expected population growth on a monthly basis for 2026 produces a target population of 47,595 for the planning period commencing on August 16, 2006 and concluding on August 16, 2026.

2. *Need for housing, employment opportunities and livability;*

Response:

The need for housing, employment opportunities and livability has been satisfied because the city's urban growth boundary expansion proposal specifically accounts for residential lands, employment opportunities including a variety of both commercial and industrial categories and livability issues such as parks and the orientation of land uses. These items are addressed in detail in the city's response to statewide goals 5,8,9,10 and 14 found in Section III of this report. Because Section III demonstrates conformance with the issues of housing, employment and livability and the applicable statewide planning goals that address these items, the city finds no need to repeat that language in its entirety here. Instead, the city hereby incorporates the responses in Section III into addressing this comprehensive plan policy.

3. *Orderly and economic provisions of public facilities and services;*

Response:

An orderly and economic provision of public facilities and services can be offered to the Far West Redmond Expansion Area because of several reasons. The area can be served by gravity sewer. The area is adjacent to the alignment of the west side interceptor sewer line that will enable development on the west side of Redmond. The area is close to existing schools. The area can assist in the needed transportation improvements on Helmholtz Way and at critical intersections along Helmholtz Way, including the intersection of Helots Way and Hwy 126, which is the most important intersection along this transportation corridor. In addition, including the Far West Expansion Area will bring in all of Obsidian Avenue as it exists west of Helmholtz Way. Improving Obsidian Avenue will become necessary to develop lands to the southwest of the Helmholtz/Obsidian intersection and additional r-o-w along this road way will prove critical to providing the necessary transportation and other infrastructure for all of the lands in this vicinity, as well as placing existing utilities underground.

4. *Maximum efficiency of land uses;*

Response:

Including the Far West Expansion Area satisfies the requirement for the maximum efficiency of land uses because it is already a rural residential exception area so growth is being focused in an area that some development already exists rather than introducing urban development into other areas that have no existing settlement pattern. Also, enabling development in this portion of the

Redmond URA allows maximum access to the transportation and infrastructure corridors planned for the west side of the city that will result in maximum urban efficiencies. Furthermore, the Far West Expansion Area avoids unnecessary gaps between the urban growth boundary and the boundary of the URA.

Running all of the anticipated infrastructure right past the Far West Expansion Area and promoting urban development all around it while retaining the area as rural land would not be the maximum efficiency of land use. To the contrary, running the west side interceptor and improving Helmholtz Way directly adjacent to the Far West Expansion Area but not allowing the area to develop would be an inefficient use of land.

5. *Environmental, energy, economic and social consequences;*

Response:

The environmental, energy, economic, and social consequences for future urban expansion were studied in general terms as part of the Redmond URA analysis. The proposed UGB expansion is driven by the need for housing. This area can be efficiently served by City water, sewer and transportation facilities and provides the opportunity for housing to be located close to core urban services and places of employment. The proximity of housing to other urban uses can result in shortened travel times and less vehicle-miles traveled can decrease pollution and congestion.

Expanding the UGB to the Far West is also part of a vision to create neighborhood centers within the City of Redmond so that not all commercial activity is concentrated along the highways. Neighborhood centers will have a mix of uses and will provide the opportunity for residents to choose alternative modes to driving -- walking, biking, taking transit -- in order to get to services that otherwise could only be accessed by car. Allowing for these transportation choices will minimize the air and water pollution associated with vehicle emissions, and is intended to slow down the demand for road building and widening that consumes land.

There are no natural surface water features in the vicinity of the proposed Far West Area expansion. The City of Redmond has developed a groundwater protection program to minimize adverse impacts of urban development on groundwater resources, particularly from the infiltration of stormwater runoff into the ground. No adverse impacts to water resources are anticipated from the proposed action.

The proposed UGB expansion is founded on the need for housing. If sufficient housing is not provided in Redmond, then people working or accessing services in Redmond may be forced to live in other communities and drive into the city for work and services, unnecessarily driving up fuel and energy usage in the city. Insufficient housing in Redmond may also lead to haphazard, "release valve" development patterns in neighboring communities that are not able to capitalize on existing public facilities and infrastructure the way that Redmond is and, therefore, is much less efficient.

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be accessed by car. Allowing for these transportation choices will minimize fuel and energy usage associated with vehicle emissions.

Including the Far West Expansion Area carries a clear social benefit because it will enable a maximum amount of existing residents to participate in the city's growth. The residents of the Far West Expansion Area are not big developers with numerous projects occurring inside and out of the central Oregon region. They can't just move on to another project in another city. Instead, they are citizens and tax payers who have supported community events and the Redmond School District for generations. The citizens of the Far West Area have sent their kids to Redmond Schools where they played high school basketball on state ranked teams and rodeo'd when the Redmond Rodeo Team won the state championship every year. The citizens in this area have helped their neighbors and they have serviced in our nations armed services. They have made their home in the Redmond Community for many, many years and they have never apologized for being from Redmond or coming from Deschutes County. The citizens in the Far West Expansion Area have never, ever been anything but proud to live in Redmond, Oregon. For all of the reasons stated in the paragraph, not including the Far West Expansion Area would have a negative social consequence.

6. *Retention of agricultural land as defined, with Class I being the highest priority for retention and Class VI the lowest priority.*

Response:

It is clear that the city of Redmond, Deschutes County and the state of Oregon have a highly developed culture of protecting agricultural areas for crop and livestock production. In fact, farm land protection and exclusive farm use zoning is a hallmark of the Oregon planning system. Another Oregon hallmark is the requirement for cities and counties to adopt urban growth boundaries pursuant to Goal 14.

The soil survey for the Deschutes Area was originally prepared by the USDA Soil Conservation Service (SCS), which has gone on to become the Natural Resource Conservation Service (NRCS). The maps included in the Deschutes Area Soil survey show that much of the land surrounding the city of Redmond is considered Deschutes Sandy Loam. Additional information provided by the NRCS identifies that Deschutes Sandy Loam has an agricultural capability Class III when irrigated and is considered a prime agricultural soil. When Deschutes Sandy Loam is not irrigated it has an agricultural capability class VI and is not considered a prime agricultural soil. Redmond Sandy Loam is another soil that is present in more limited quantities and is considered class III soil and therefore prime when irrigated and class VI when not irrigated.

A chart entitled "High-Value Farmland Soils" has been developed by the Department of Land Conservation and Development in consultation with the NRCS. This chart has been included as part of Attachment 8 and shows that the Deschutes Area includes no inventoried class I soils and very few, if any, inventoried class II soils. Therefore, irrigated class III soils constitute the most productive farmlands Deschutes County has to offer.

The map included on page 98 of the 1979 Deschutes County Comprehensive Plan Resource Element shows that nearly all of the land near Redmond, west of Hwy 97 is included in an irrigation district. Judging from the map, it appears that the only portion of this area not included in the

irrigation district is on and immediately around Forked Horn Butte. Tracts comprised of prime soil are considered "high-value farmland" pursuant to ORS 215.710

As fuel costs continue to escalate the prices of food and fiber will also increase, particularly when these goods are shipped from distant locations. If this trend does not level off it may become increasingly important that urban areas retain an adequate amount of nearby irrigated farmland to produce commodities for the local market. The farmlands around Redmond have historically been used for crop, livestock and dairy production. Although some of the more intensive agricultural practices have subsided commercial farm operations continue to be present. Past practices can become revitalized and could become more important to the ability to provide affordable food to the citizens of Redmond and Deschutes County.

The Far West Expansion Area is a rural residential exception area. This means that Deschutes County has made a determination that the area is "irrevocably committed" to uses other than commercial agriculture. Therefore, the Far West Expansion Area is not considered agricultural land as that term is defined by Goal 3 and OAR 660-033-0020(1) and is not protected by Goal 3.

More important regarding compliance with this criterion, including the Far West Expansion Area guarantees that the city has selected the maximum amount of nonagricultural lands while maintaining the most efficient configuration of urban development possible. Including the Far West Expansion Area is critical to this overall Urban Growth Boundary expansion project because it provides certainty that agricultural lands protected under Goal 3 remain available for resource uses at other rural locations around the city. The Far West Expansion Area also serves to balance the agricultural lands that have been necessary to be included in the Northwest and North & West Expansion Areas.

7. *Compatibility of urban uses with nearby agricultural activities.*

Response:

The proposed Far West UGB Expansion Area is a rural residential exception area zoned MUA-10 by Deschutes County. Designation of the area as an URA makes it the highest priority for urbanization, per ORS 197.298.