

RESOLUTION NO. 755

A RESOLUTION ACKNOWLEDGING BUILDABLE LANDS INVENTORY AS OF APRIL 25, 2005 AND SUBSEQUENT UPDATES.

WHEREAS, on May 24, 1998, the Stayton City Council adopted Stayton's 1998 Buildable Land Inventory;

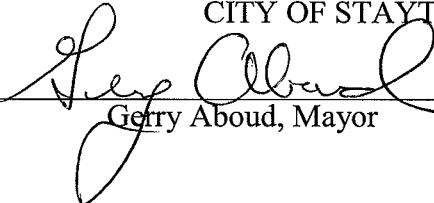
WHEREAS, the Stayton Comprehensive Plan (chapter 5, page 65) prescribed that the Buildable Lands Inventory has been updated to April 25, 2005 and shall be continually updated thereafter until conclusion of the Periodic Review of Stayton's Comprehensive Plan.

NOW THEREFORE,

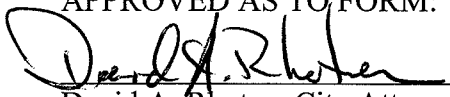
BE IT RESOLVED that the City shall use the April 25, 2005 Stayton Buildable Lands Inventory, together with subsequent updates thereof, as a database when addressing land use issues.

This Resolution shall become effective upon the adoption by the Stayton City Council

ADOPTED BY THE STAYTON CITY COUNCIL this 6th day of June 2005.

Signed: July 11, 2005 By: 
CITY OF STAYTON
Gerry Aboud, Mayor

Signed: July 11, 2005 ATTEST: 
Chris Childs, City Administrator

APPROVED AS TO FORM:

David A. Rhoten, City Attorney

Introduction

Since the completion of the December 31, 2002 Land Use Inventory and Housing Analysis, Stayton has been working on updating its land use inventory in a manner which highlights the unique characteristics of Stayton and identifies its needs for the next fifteen years based on various growth scenarios. In 2004 Stayton began the formal process of updating the Land Use Inventory and Housing Analysis of December 31, 2002.

For the process of updating the 2002 land use inventory, the use of a Geographical Information System (GIS) program was added to the inventory process. The GIS program was used to obtain the most accurate figures possible and additional analysis available through the use of mapping. The data for this report comes from both the analysis of new information accumulated since the 2002 inventory and also builds on the previous Land Use Inventory from 2002.

The update of the land use inventory and housing analysis is part of a series of updates to make Stayton's planning documents current and place the city in a better position to address future needs. The 2005 report is created by Steve Goeckritz, City Planner and Allison Thayer, Planning Intern.

Several important observations were drawn from this analysis regarding Stayton's existing housing supply and future needs through the year 2020.

- ❖ Development will occur over time in a sequential, planned fashion, with build-out of the Urban Growth Boundary assumed to occur beyond the fifteen year growth horizon presented here.
- ❖ To protect significant natural resources, policies need to be developed addressing wetlands and riparian areas.
- ❖ Single family homes predominate.
- ❖ To maintain the housing ratio, consideration will have to be given for additional multi-family housing and/or more medium density development.
- ❖ Low Density zoning predominates inside the city and outside the city inside the Urban Growth Boundary.
- ❖ There is not enough land within the city limits to meet either the 2.4% or 3.0% growth scenario.
- ❖ Stayton needs a minimum of 90.8 to 146.3 acres for all three residential zones to meet either the 2.4% or 3.0% growth scenario.
- ❖ Stayton could find that there is not an adequate amount of commercially zoned land within the city for the 15 year growth scenario.

Methodology

The structure and purpose of this document are to identify if Stayton has a need for more buildable land to meet current needs, if Stayton needs more land to meet the projected population for 2020, the geography of different types of land uses within the city, and what changes have occurred within the city since the 2002 analysis.

The 2005 analysis first identifies residential land uses, the density of development, housing characteristics, demographics of Stayton and three other comparable cities, and projected needs for 2020. The current uses and amounts of commercial and industrial land are also addressed. The existing public lands and plans for additional public land are already addressed, in part, by the Stayton Park and Recreation Master Plan, adopted by ordinance in 2005. As a result, it will only be mentioned peripherally in this document.

The sources for the data used in this analysis were Marion County Tax Assessor Records, Marion County Building Permits, GIS data from Marion County and field visits. Additional information was gathered from the U.S. Census Bureau, Portland State University's Population Research Center, and the Oregon Economic Development Department.

There were several general assumptions made in this analysis.

- ✧ All land inventory, densities, or other land calculations are done from the total net acres within the city, not total gross acres. This eliminates land dedicated for rights-of-way or waterways that cannot be developed from the calculations.
- ✧ Redevelopable land is subjectively identified in this analysis for there is no objective, standardized definition of redevelopable land. For the purposes of this analysis redevelopable land includes parcels large enough to allow them to be partitioned into smaller parcels for further development. However, the probability of any of these identified parcels being redeveloped cannot be determined. Redevelopment is a more difficult process than developing vacant property and happens less frequently and must be taken into account in any analysis.
- ✧ Five parcels of land currently designated Low Density will be rezoned public land for public parks in 2005. One parcel is located in the Sylvan Springs Planned Unit Development (PUD), adjacent to Wildflower Court. Two more parcels in Sylvan Springs are open area wetlands and will become a park area between Sylvan Springs Phase III and State Highway 22. The fourth parcel is located on the north bank of the North Santiam River. Additionally, a fifth large parcel adjacent to that one and also on the north bank of the river will be annexed and rezoned as public park This is the newly created Stayton Riverfront Park. All of these parcels are

identified as Public Semi-Public in the interim and the acreage are included in the analysis. (See Map 6)

- ❖ The development code standards for residential zones governing the number of units per acre are anticipated to change before 2020.
- ❖ Stayton will continue to average 2.7 persons per household until 2020
- ❖ The population of Stayton may be as high as 11,678 people.
- ❖ Population projections are for the time period up to 2020, ending on December 31, 2019.
- ❖ Statewide planning goals require planning for build-out of the UGB, and it is assumed that the current location of the UGB in the planning area will neither expand nor contract within the 15 year growth horizon.

Definitions

There are several terms used in this analysis that need definition. These definitions are derived in part from the Stayton Municipal Code Title 17, and in part from general accepted practice.

Apartments: Apartments are defined in this document as any multi-family development with four or more units.

Area Inside the Urban Growth Boundary, Outside the City Limits (OCIB): Area inside the Urban Growth Boundary that is outside the city limits. This area does not include any areas incorporated into the city, only areas of the county located within the Urban Growth Boundary. Identified by the acronym OCIB, Outside City Inside Boundary.

Density: the number of dwellings, mobile homes, or mobile home spaces **per net acre**.

Development: Human activity physically affecting land resources, including but not limited to the division of parcels; the erection, reconstruction, modification, relocation, or enlargement of structures, grading, landfill, or excavation of land, storage on land or resource surfaces; drilling or substantial site alteration such as involved in mining, surfacing such as paving; and planned elective removal of trees and vegetation.

Dwelling Unit: one or more habitable rooms which are occupied or intended to be occupied by one family with facilities for living, sleeping, cooking and eating.

Multi-Family Dwelling: A building or portion thereof designed for occupancy by two or more families living independently of each other. **This includes both renter-occupied and owner-occupied housing such as zero-lot line, condominiums and town homes.**

Multi-Plex: Includes duplexes and triplexes.

Non-Conforming Development: Development within a zone that does not conform to the standards of the Stayton Municipal Code Title 17 for that zone.

Redevelopable Land: Residential land that has minimal development in the form of outbuildings or subsidiary buildings, or residential land that has a dwelling unit but could be partitioned or more dwelling units added to the parcel under the development code standards for that zone.

Right-of-Way: The area between boundary lines of a street or other easement.

Vacant Land: Land that has not been significantly developed in any manner.

Year: For the purposes of this discussion, a year is measured from January 1 to December 31 of that calendar year.

Analysis

This analysis will begin with general data about Stayton as a whole as a frame for more area specific analyses. Secondly, data specific to residential lands will be discussed, and finally commercial, industrial and public lands. Within the residential lands discussion there is basic demographic data including a comparison to three cities of similar size to Stayton. The discussion will then look at projected population and residential land needs for 2020. Commercial and industrial lands are inventoried and discussed next. Finally any future need for residential land will be compared to the supply of land available between the city limits and Stayton's Urban Growth Boundary (UGB).

Before beginning any analysis, it is useful to know the overall acreages for Stayton as a whole. Table 1, shows the overall gross acreages for the city and the area outside the City Limits and inside the Urban Growth Boundary (OCIB). As this table illustrates, Stayton has a substantial amount of acreage between the city limits and the UGB.

**Table 1: Total Acreage Inside
City Limits and OCIB**

Location	Gross Acreage
Gross Inside City	1774.9
OCIB*	1258.4
Total Inside UGB	3033.3

* does not include Highway 22 right-of-way

Currently, there are about three thousand acres of land inside Stayton’s UGB. Approximately 60% of that land is located inside the city limits. Because these are gross acres and not net acres, this figure includes land that is unavailable because of waterways, wetlands, or public right-of-ways for roads. At the moment it is not possible to calculate the acreage occupied by wetlands because they have not been specifically delineated. The Stayton Local Wetlands and Riparian Inventory does identify a substantial amount of wetlands within the Stayton UGB especially along Mill Creek to the north and the North Santiam River to the south. These wetlands could impact available developable acreage totals. The one caveat to the number of gross acres between the city limits and the UGB is the Oregon Department of Transportation’s right-of-way for State Highway 22 because the acreage of that right-of-way was unavailable.

Because the rest of this analysis is based on the net acres within the city, Table 2, shows the difference between the net and gross acres. Public road right-of-ways are the portion of land that is dedicated for roads. This area is determined by the width of the road right-of-way, which is generally speaking, 60 feet wide, but can vary from 40 feet to 80 feet. Calculating all the right-of-ways within the Stayton UGB found 261 acres within the City being used by public right-of-ways and 28 acres of OCIB land used for right-of-ways.

Table 2: Net Acreage Inside City Limits and OCIB

Location	Acreage		Total Acreage
	Inside City	OCIB	
Gross acres	1774.9	1258.4	3033.3
Right-of-way	261.0	27.7	288.8
Net acres	1513.9	1230.6	2744.5
Percent right-of-way	14.7%	2.2%	9.5%

As Table 2 illustrates, when the acreage for public right-of-ways are eliminated, the acreage available for development is decreased to 1,514 acres within the city and 1,230 acres OCIB. The difference in the amount of land being used for right-of-ways inside and outside the city is because land that is OCIB is more limited in development capacity. Until the land is annexed into the city, it falls under Marion County’s Development Code. The general rule of thumb for right of ways is that they account for approximately 30% of the gross acreage within a city’s limits. The percentage of land for right of ways within are much lower in part because Stayton has a large amount of public land, in several large parcels that do not have any right-of-ways across them, pushing the percentage of land dedicated for right-of-ways down. This will be discussed more in depth later in the analysis. Map 1 shows all the zoning for the City of Stayton and the large sections of public land can be seen scattered throughout the city.

Much of the land in the Public Semi-Public zone is used for schools or parks. The land designated for commercial or industrial uses is generous, with a large section of the western side of Stayton devoted to industrial zones and the 1st Street corridor and historical district on the south ends of 1st and 3rd streets having a strong commercial component. There is also a large amount of Low Density residential acreage throughout the city. Medium Density is scattered throughout the city, and there are only a few parcels of High Density zoned land in Stayton also distributed in a scattered pattern throughout the city.

Residential Lands

The housing analysis will begin by addressing residentially zoned lands within the city limits. As stated before, all analysis from this point forward will be done using **net** acreages not **gross** acreages. Table 3 presents the three residential zones within the city and the amount of buildable land available for each zone. The designation of redevelopable land is, as was stated in the methodology, a subjective determination, and the potential for that land to be further developed is difficult to ascertain. This number is mentioned as a potential area for expansion not a definite. More important are the acreages of vacant and developed land shown in Table 3.

Table 3: Supply of Buildable Residential Lands within the City Limits by Zone

Column 1	Column 2		Column 3		Column 4		Column 5		Column 6		Column 7	
Zoning Designation	Total Acreage		Developed Acreage		Vacant Acreage		Redevelopable Acreage		Net Buildable Acreage		Percent Buildable**	
	2004	2003	2004	2003	2004	2003	2004	2003	2004	2003	2004	2003
Low Density	533.5	569.3	428.7	408.1	78.6	122.6	26.1	26.1	104.8	148.7	19.6%	26.1%
Medium Density	152.7	152.7	135.8	127.3	7.7	16.3	9.2	9.2	16.8	25.4	11.0%	16.6%
High Density	41.8	41.8	35.9	35.9	4.2	4.2	1.7	1.7	6.0	6.0	14.3%	14.3%
Total*:	728.0	763.9	600.4	571.3	90.6	143.0	37.0	37.0	127.6	180.1	17.5%	23.6%

* The numbers presented here and in all subsequent tables are all rounded up to tenths. Small math errors can be attributed to the difference in the rounded numbers and the actual numbers.

** The total percent buildable columns are not derived from adding up the percent buildable from the three residential zones. The total percent buildable is the total net acres for all three zones divided by the total acreage for all three zones

There is a total of 728 acres of land currently zoned residential within Stayton's city limits, of which 128 is available for development. Thirty-seven acres (Total column 5) of that land is designated redevelopable land, and therefore only 91 acres are definitely available for development. This chart also shows residential development added since 2002. The total acreage used for new development in 2003 and 2004 was 20.6 acres in the Low Density (column 3) and 8.6 acres in the Medium Density zone (column 3). There was also a decrease of 35.8 acres in the total amount of Low Density land as a result of the zone change creating park land in Sylvan Springs and Riverfront Park along the North Santiam River (column 2). There was no development in the High Density zone in 2003 or 2004.

The Low Density zone still has 104.8 acres (column 6) of buildable land. The Medium Density zone has 16.8 acres of buildable land. The Medium Density zone also includes the mobile home parks for Stayton, both of which are almost fully developed. Currently, there are only 4.2 undeveloped acres in the High Density zone (column 5). Those vacant acres represent the parcel on Cascade Highway next to Santiam Station. This is the only vacant High Density land within the city. All three residential zones contain more than 80% developed land and overall, only 17.5% of residential lands are still buildable (column 7). The proportion of land dedicated to the three residential zones is 73.7% in Low Density, 20.6% in Medium Density, and 5.6% in High Density. The distribution of buildable land around the city can be seen in Map 2. Land by Development Status.

Map 2 illustrates how much of the developable residential land is concentrated into a few large parcels of land on the east side of Stayton, primarily on 10th Ave. and East Santiam. There are two additional parcels one to the northwest near Golf Club Road and the other southwest of the intersection at Water St. and 1st St. The parcel on Cascade Highway on the north end of Stayton comprises the one piece of undeveloped High Density zoned acreage in Stayton. There are large lots on the east side of town that could qualify as redevelopable based on the size of the parcels, but the probability that they would be redeveloped is so low they were not considered in this analysis. Much of the land that has been identified as redevelopable is in the southwestern portion of Stayton in some of the older neighborhoods. The west side of Stayton has been almost completely developed except for the nine acre parcel adjacent to the Quail Run Subdivision, zoned Low Density residential.

Density of Residential Development

An important part of a housing needs analysis is to determine the density of development that is occurring and whether that development is sufficient to meet the projected needs of the next fifteen years. Density calculations are also important because the Oregon Department of Land Conservation and Development (DLCD) has required density levels for cities in Oregon that need to be met. Density is the number of **units per net acre**. The first step to finding the density of development is to determine the number of dwelling units within each zone. Density is calculated by dividing the number of dwelling units by the acreage associated with those units. Table 4 shows the number of dwelling units for each residential zone. The number of dwelling units is further broken down into single-family units and multi-family units.

Table 4: Number of Housing Units by Housing Type and Zone Within the City Limits

Zoning Designation	Single Family Detached		Multi-Family Housing		Total Units	
	2004	2003	2004	2003	2004	2003
Low Density	1,444	1,372	26	26	1,470	1,398
Medium Density	264	225	641	630	905	855
High Density	37	37	478	478	515	515
Total	1,745	1,634	1,145	1,134	2,890	2,768

The majority of dwelling units in Stayton are single-family detached units mainly located in the Low Density Zone. Between 2002 and 2004, 111 new single-family dwellings were built, and 11 multi-family units were built. There were no units built in the High Density zone, and of the units built in this period 72 were built in Low Density and 39 were built in Medium Density. The acreages of these dwelling units are shown in Table 5.

For this analysis, it is important to note that there is a difference between “developed” acreage, acreage with any sort of development, and acreage with a dwelling unit. Some land is developed according to the definition of “developed” but does not have a dwelling unit on the property. This may be for several reasons such as, a parcel

too small to develop under the current development code, parcels that have outbuildings for an adjoining property with a dwelling unit, or parcels that are being used jointly as one property. Therefore, the total acreage for dwelling units shown in Table 3 is different than the “developed” acreage identified in Table 5.

In addition to the natural development patterns of the city, density is determined in part by the requirements of SMC Title 17 and the standards for density it sets out for each zone. Those standards are as follows:

- ❖ Low Density: Density shall not exceed six units per acre. A minimum of ten-thousand square foot lots east of a north-south line from the north City limits to the south City limits running along the center line of 10th Ave. West of 10th Ave. lots are a minimum of eight thousand square feet.
- ❖ Medium Density: Density shall not exceed 12 units per acre. Minimum lot size is seven thousand square feet.
- ❖ High Density: Minimum density shall be 13 units per acre, there shall be no upper limit to the maximum allowable density. A six thousand square foot lot minimum lot size for single family dwellings, duplexes and multi-family dwellings.

Table 5 has the acreages associated with the dwelling units from Table 4. Interestingly, there was a significantly higher amount of Medium Density zoned land used for single family development than for multi-family development during this period. Only 0.485 acres were used for multi-family development while 8.4 acres were used for single family dwellings in the Medium Density zone. Looking back at Table 4, there were 39 single family dwelling units built and only eleven multi-family units built in the Medium Density zone. There was very little multi-family development for any of the residential zones in Stayton from 2002 to 2004.

Table 5: Total Acreages of Housing Types Within the City Limits

Zoning Designation	Single Family Detached		Multi-Family Housing		Total Acres	
	2004	2003	2004	2003	2004	2003
Low Density	414.1	394.8	2.4	2.0	416.5	396.8
Medium Density	58.1	49.6	84.4	83.9	142.5	133.6
High Density	7.1	7.1	29.3	29.3	36.4	36.4
Total	479.3	451.5	116.1	115.2	595.3	566.7

Since single-family units take up the most acreage, and have the largest minimum lot sizes in Low Density, it is consistent then that the largest increase in acreage is for single-family development in the Low Density zone. Again Table 5 shows that there was no development in the High Density in 2003 and 2004. The information in Tables 4 and 5 are now used to determine the density of development or the units per acre. A higher number indicates more dense development, and a lower number indicates more open development. These density numbers in Table 6 are for each zone as a whole, averaging out the density of individual parcels over each zone.

It is important to note when studying Table 5 that the total overall densities for single-family, multi-family and total units are not calculated by adding the densities for each zone and finding the average. The total densities come from dividing the total number of units (Table 4) by the total number of acres (Table 5) for each category. This is also true for Table 6. The distribution of density throughout the city can be seen in Map 2.

This map shows the density for each individual parcel with dwelling units within the city. Vacant lots are not counted. As the map illustrates, density in Stayton is concentrated more on the western side of the city than the eastern. The Sylvan Springs development in the northeastern portion of Stayton does provide some additional density to the city with areas of Medium Density, but this PUD is currently comprised only of single family dwelling units. The area with the least density is on the east side of town around 10th Ave. and to the east. This is logical as there is a larger minimum lot size requirement east of 10th Ave in the Low Density zone. There are several parcels in that area of three-quarters or more acres and this brings the density down in that area of the city.

Looking at Table 6, the overall density of residential development in Stayton is 4.9 units per acre. This overall density is lower than the goal of six units per acre that DLCD is looking for.

Table 6: Average Net Density of Residential Development Within City Limits; All Housing Types

Zoning Designation	Single Family Detached			Multi-Family Housing			Density by Zone		
	2004	2003	Change in Density	2004	2003	Change in Density	2004	2003	Change in Density
Low Density	3.49	3.48	0.011	10.98	13.00	(2.02)	3.53	3.52	0.01
Medium Density	4.55	4.53	0.014	7.59	7.51	0.09	6.35	6.40	(0.05)
High Density	5.22	5.22	-	16.32	16.32	-	14.16	14.16	-
Total all Zones	3.64	3.62	0.022	9.87	9.84	0.02	4.85	4.88	(0.03)

(-) indicates no change in units, acres or density

For 2003 and 2004 there were both increases and decreases in density for different zones and different housing types. The total density for the Medium Density zone had a decrease during the two year period of 0.09 units per acre. There was a small positive increase in density in the Low Density Zone during this period as well. Overall, the Low Density zone only achieved a density of 3.5 units per acre. Given the large percentage of Low Density land within the city, this may be in part responsible for the low overall density for the city. The density of the High Density zone with 14.2 units per acre is responsible for moving the overall city density higher. More information on the trends in density of new development is presented in Table 7.

The importance in looking at the density of just new development is that it shows whether or not current development is helping or hindering Stayton's ability to make its density goals as set by DLCD of 6 units per acre for the whole city. Table 7 shows that most development added in 2003 and 2004 has been similar or of higher densities than the average densities for the Low and Medium Density zones.

Table 7: Average Net Density for Newly Constructed Units Within the City Limits 2003 & 2004

Zoning	Single Family Detached			Multi-Family Housing			Total Units		
	New Units Added	Acres Developed	Ave. Net Density	New Units Added	Acres Developed	Ave. Net Density	New Units Added	Acres Developed	Ave. Net Density
Low Density	72.0	19.4	3.7	-	-	-	72.0	19.7	3.7
Medium Density	39.0	8.4	4.6	11.0	1.6	7.1	50.0	8.9	5.6
High Density	-	-	-	-	-	-	-	-	-
Total all Zones	111.0	27.8	4.0	11.0	0.9	12.9	122.0	28.6	4.3

The density of new multi-family units in the Medium Density zone was 0.4 units per acre lower than the average of 7.59 units per acre (see Table 6). Table 6 also shows a slight loss in density overall for the Medium Density zone. Table 7 shows that this loss is coming from the new development of single family housing in the Medium Density zone. The single family units developed in the Medium Density zone in 2003 and 2004 had an average net density of only 4.4 (Table 7) while the density for all Medium Density single family units was 4.55 (Table 6). The number of single family units built in the Medium Density zone was also significantly larger than the number of multi-family units built, causing them to have more weight in the overall density for the Medium Density zone in this period. This means that the development of single-family dwellings in the Medium Density zone actually lowered the overall density of that zone in 2003 and 2004. These factors meant that the overall new residential development that occurred in 2003 and 2004 had a lower average net density than the city as a whole.

Analysis Existing Housing Stock

The next part of the housing needs analysis is examining the general characteristics of the existing housing within the city. This includes type of housing, age and value. Understanding the general characteristics of housing in Stayton reveals whether Stayton has enough newer housing, affordable housing and mix of single family and multi-family housing. The type of housing in Stayton has been introduced already in previous tables as single-family residential and multi-family residential. Multi-family includes duplexes, multi-plexes and apartments. Table 8 breaks down Stayton’s existing housing stock by type for analysis.

Table 8: Housing Units Within the City Limits by Type

	2004	Percent	2003	Percent
Single Family	1,745	60.4%	1,634	59.0%
Multi-Family	1,145	39.6%	1,134	41.0%
Total	2,890	100.0%	2,768	100.0%

Table 8 shows that there was a decline in the ratio of single-family to multi-family development in 2003 and 2004. This reflects the small number of multi-family units built during this period (see Table 7). This indicates that there are significantly more new single-family residential homes being built in Stayton than multi-family housing than in previous periods. However, this is only a two year analysis. Charts 1, and 2 shows the trend in building types for single family and multi-family dwellings over the last ten years for a more longitudinal analysis.

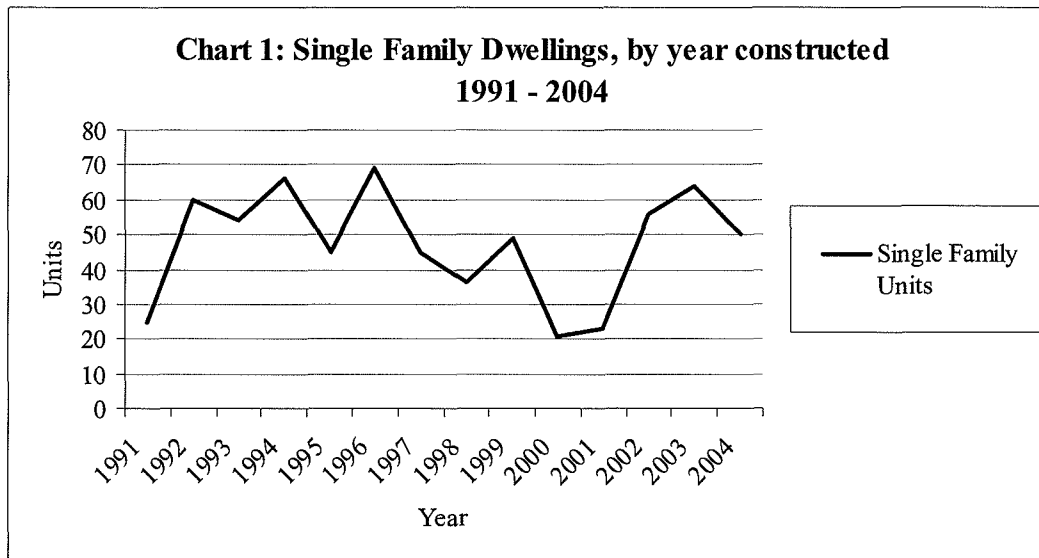
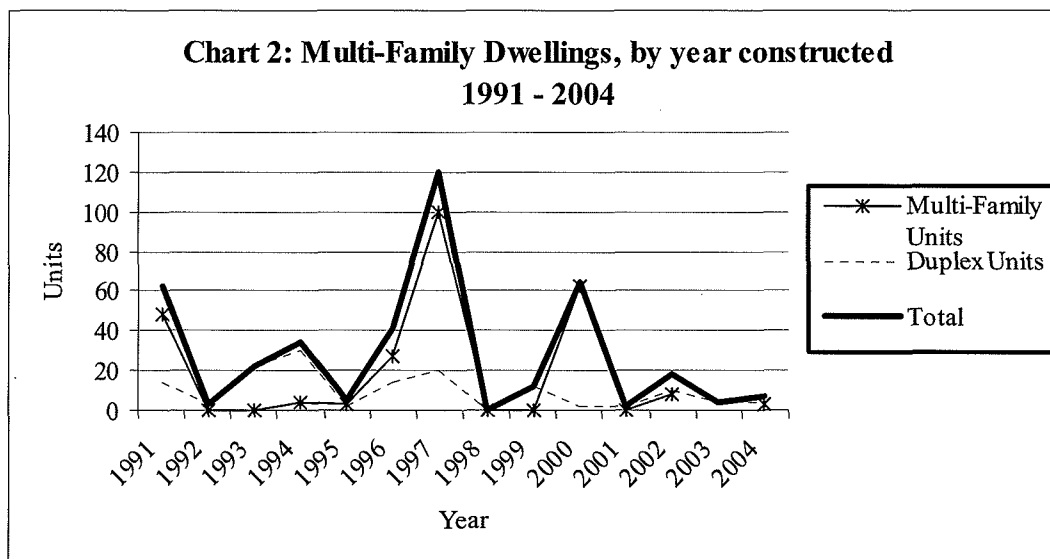


Chart 1 shows several peaks in building activity, especially in 1991, 1997 and 2004 for single family dwellings, and a slowdown in building in 2000 and 2001. As to be expected, the construction of single family dwellings has almost always outpaced the construction of multi-family dwellings. Chart 2 shows there were slightly different peaks in the building of multi-family dwellings. Multi-family dwelling construction was also more sporadic than single family dwelling construction. Chart 1 shows clearly that every year had more than 20 new single family dwellings being built while Chart 2 shows that there were several years when five or less multi-family dwellings were built and there were less than 20 units a year being built for the last four years in a long trend of little activity for new multi-family dwellings.



The major peak in building of multi-family dwellings was in 1997 and again in 2000. The four year trend of little multi-family development may contribute to the

decline in density for the Medium Density zone in particular. It has not affected the density of the High Density zone as there was no development in the High Density zone during this period, but the Medium Density zone was also designed for multi-family dwellings as mentioned previously.

The third piece of data that provides insight into the condition of existing housing stock is housing valuation, shown in Table 9. This data was obtained from building permit valuations. This data is merely an indicator as these values are those assigned at the time the building permit was issued. **These are building permit appraisal values.** They are not formal assessed values. In addition, information was not available further back than 2003 so all of these numbers are recent with no history. This number will be more relevant in future analyses when more historical data will have accumulated.

This is a valuation of new single family homes only. Remodels and multi-family housing are not included. The majority of homes built in 2003 and 2004 were valued at between \$120,000 and \$160,000 at the time the building permit was issued. No houses were valued below \$99,999 at the time building permits were issued during this period but six homes were valued at more than \$300,000 during this period.

The breakdown of Stayton's housing stock in Table 8 shows that dwelling units are predominately single family dwellings. The dwellings built in the last two years are also on the higher end of the appraisal values. There was also no high density, large multi-family development during this period.

Table 9: Housing Valuation Summary for New Single -Family Housing Within City Limits, 2003-2004
Building Permit Appraisal Values in Thousands

Zoning Designation	\$99 & below	\$100- \$119	\$120- \$139	\$140- \$159	\$160- \$179	\$180- \$199	\$200- \$299	\$300+	Total*
Low Density	0	5	15	19	9	9	14	6	77
Medium Density	0	7	13	5	3	4	0	0	32
High Density	0	0	0	0	0	0	0	0	0
Total	0	12	28	24	12	13	14	6	109

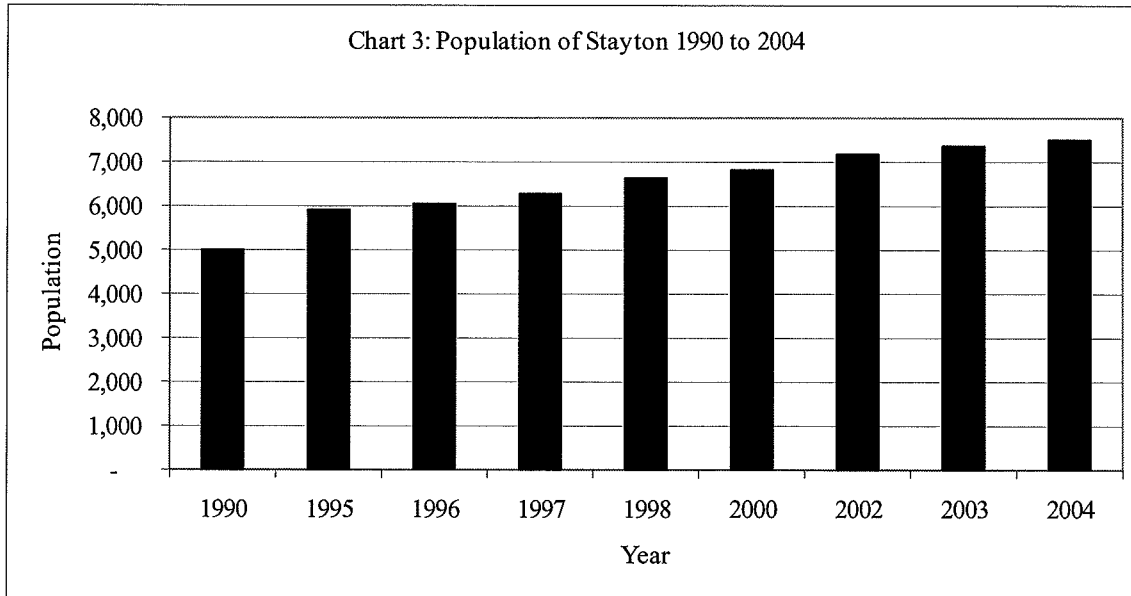
*Does not include 2 manufactured homes built in 2004 that are counted in Tables 4 & 7.
 True total is 111 new units for 2003 and 2004

Demographics

Demographics of Stayton's population are useful at this point in the analysis because understanding the needs of the population and how it is going to grow in the future is an important part of understanding how much more development will be needed in the next twenty years. Part of this section includes a comparison of Stayton to three other cities of similar size also located near a major city. The three cities chosen on the basis of population and location were, Monmouth, Silverton, and Cottage Grove. All the data for those comparisons were taken from the 2000 U.S. Decennial Census, Portland State University's Population Research Center and the Oregon Economic Development Department.

At this point, an important note must be made. For the purposes population estimates between the U.S Census dates and for population projections, Stayton has chosen to make its own estimates and projections based on data collected within the city. Analysis of the Portland State University's Center for Population Research annual population estimates shows that the estimates for Stayton are consistently low given the amount of new development occurring within the City. The City of Stayton decided

therefore to use its own estimates for population projections because it is felt they are closer to the actual population of the City. Consequently the numbers provided by Portland State University for a 2004 population of 7,360 people were not used because the numbers are not consistent with the amount of building activity Stayton has seen.



Stayton’s population has been steadily increasing for the last four years as shown in Chart 3. While there has been a slow down in growth since 2000, growth has continued. This slow down may be in part because of a lack of infrastructure, specifically water and sewer access to accommodate large parcel development. Also the small number of large parcels currently available within the city may contribute to the slow down in growth. The current population of Stayton is approximately 7,495 people, an increase of 137 people from 2003. Over the last four years Stayton has averaged between 1.2% and 2.8% growth rates on average.

Stayton has grown by almost 2,500 people in the last fifteen years, increasing its size by one-half. There were no times in the last ten years when Stayton experienced a loss in population or a year of no growth.

Three cities of comparable size were chosen for a demographic comparison with Stayton. In addition to being of similar size to Stayton, they needed to be located near a large city to replicate Stayton’s peripheral role to Salem. Monmouth, located just north of Corvallis and west of Salem. Silverton is another peripheral city to Salem, north of Stayton and east of Salem. Cottage Grove is located south of Eugene. They are all within a 15 to 30 minute commute of these major urban areas, as Stayton is. The populations of all four cities as of the 2004 Portland State University Annual Population Report are listed in Table 10.

Stayton, Monmouth and Cottage Grove all have similar population trends from 2000 to 2004, all increasing their populations by approximately 700 people. Silverton grew only about 400 people during the same period. This seems to indicate that the growth Stayton is experiencing is fairly typical for a city of this size and location near a major city.

**Table 10: Population 2000-2004,
Stayton, Monmouth, Silverton & Cottage Grove***

	2000	2001	2002	2003	2004
Stayton	6,816	6,960	7,200	7,358	7,495
Monmouth	7,780	7,910	8,110	8,200	8,590
Silverton	7,680	7,420	7,680	7,980	8,060
Cottage Grove	8,475	8,670	8,730	8,910	9,010

*Source of Stayton's numbers are the City.
Source for other cities' numbers is PSU

Stayton also has a comparable average household size compared to the other cities as seen in Table 11. Monmouth having a lower average household size can be explained by the presence of Western Oregon State University, for students tend to have smaller households.

Because the information on income for all these cities was only available from the 2000 U.S. Census, it was decided not to use this information because of the number of changes that happened to Oregon's economy in the last five years. Instead information on the top five employers in each city in 2000 from the Oregon Economic Development Department, shown in Table 12 was used on the basis that large employers will remain relatively stable over a five year period barring major events.

**Table 11:
Average Household Size
2000, Stayton, Monmouth,
Silverton and Cottage Grove**

City	Average Household Size
Stayton	2.7
Monmouth	2.5
Silverton	2.7
Cottage Grove	2.7

Source: 2000 U.S. Census

All four cities have at least one large employer. For Stayton, the biggest employer, NORPAC Foods is related to the agricultural, food packing industry. Monmouth and Silverton both have public educational institutions for their biggest employer and Cottage Grove has a healthcare provider for its largest employer. Stayton has the most evenly distributed job force of any of these cities with all the employers having more than one hundred full time employees in 2000, while Monmouth was the most limited with most employees working for Western Oregon State University in 2000. All four cities have agricultural or forest products industries in their top five employers.

Stayton and these other three communities can also be compared on their housing supply. This information is all available from the 2000 U.S. Census. Table 13 shows the ratio of owner occupied housing to renter occupied housing. This is relevant because renter occupied housing captures much of the multi-family housing in an area.

For this chart, Monmouth is very different from the other cities because of the high percentage of renters in that city, a result of having a university campus as students are more likely to live in rented housing. Therefore, only Silverton and Cottage Grove will be examined. Stayton has a lower percentage of owner occupied property than either Silverton or Cottage Grove, although its vacancy rate is similar to Cottage Grove. Stayton is unique in that it has had a large jump in the percentage of vacant housing since 1990. This may be in part attributable to the addition of Lakeside Manor in 1997. The addition of more multi-family housing might also account for the drop in owner occupied housing in this period. This might indicate the presence of more multi-family housing in Stayton than in Silverton or Cottage Grove. Given these differences, the cities, with the exception of Monmouth, have distributions of approximately 60% owner occupied housing and 40% renter occupied housing.

Table 12: Top Five Employers, 2000, Stayton, Monmouth, Silverton, & Cottage Grove

Stayton		Monmouth		Silverton		Cottage Grove	
Employer	Employees	Employer	Employees	Employer	Employees	Employer	Employees
NORPAC Foods	350	Western Oregon State University	656	Silverton School District	425	Cottage Grove Healthcare Community	400
Phillips Industries	379	Boise Cascade	52	Redman Industries (Manufactured Housing)	250	Weyehauser Co.	245
Stayton Schools	186	Marr Brothers Barkdust	8	Mallorie's Dairy, Inc.	70	Kimwood Corp. (Woodworking Machinery)	70
Santiam Memorial Hospital	129	Agriweld	7	Quest International (Vegetable Processing)	30	Kwikee Products Co. (Recreational Vehicle Parts & Accessories)	67
Trus Joist MacMillan	113	SJL Woodworking	7	Stockwell Manufacturing	30	Starfire Lumber Co.	67

Comparing Stayton to three cities of similar size and locale shows that Stayton is typical of a small town of this type. It is experiencing steady growth and has at least one major industry. Stayton sets itself apart in two ways however. First it has a more diverse spread to its employment base, having more employees evenly distributed between the five biggest employers. Second, Stayton has a higher percentage of renters than Silverton or Cottage Grove, possibly indicating a higher percentage of multi-family housing in Stayton.

Table 13: Occupancy Status for Stayton, Monmouth, Silverton and Cottage Grove

	Owner Occupied		Renter Occupied		Vacant	
	2000	1990	2000	1990	2000	1990
Stayton	55.5%	59.3%	39.4%	38.0%	5.1%	2.7%
Monmouth	43.5%	43.6%	50.4%	51.6%	6.0%	4.8%
Silverton	57.4%	60.1%	37.1%	35.8%	5.5%	4.1%
Cottage Grove	59.4%	55.1%	35.8%	40.6%	4.8%	4.2%

Population Projections

Part of a buildable lands inventory needs analysis is projecting the future needs of a community for the next twenty years. Population projections are derived for cities by the counties. The counties receive population projections from the State Department of Economic Development. Marion County initially provided Stayton with a 2020 population forecast of 9,250. However, subsequent discussions with the County have

resulted in a revised population estimate of 2.4% to 3.0% (See Marion County Memo of March 30, 2004 in Appendix A)..

Table 14a: Stayton Housing Needs Projection of 2.4%

Population	2003	2004	2020	Population Change
Stayton	7,200	7,495	10,698	3,203
Number of Units				Needed Units
Single Family Units	1,637	1,745	2,461	716
Multi-Family Units	1,134	1,145	1,615	470
Total Units	2,771	2,890	4,076	1,186

Table 14b: Stayton Housing Needs Projection of 3.0%

Population	2003	2004	2020	Population Change
Stayton	7,200	7,495	11,678	4,183
Number of Units				Needed Units
Single Family Units	1,637	1,745	2,680	935
Multi-Family Units	1,134	1,145	1,759	614
Total Units	2,771	2,890	4,439	1,549

The projected population range for 2020 in Stayton is 10,698 (2.4%) to 11,678 (3.0%). Tables 14a and 14b show the two population projections. To meet the need of this population range an additional 1,186 to 1,549 dwelling units will be needed. That is an average of 79 units to 103 units per year for the next fifteen years. Of those units needed to meet the 2020 projections, 470 to 614 units need to be multi-family units and 716 to 935 need to be single family units. This proportion of single-family versus multi-family needed units is taken from the existing ratio of 60.4% single family housing to 39.6% multi-family housing.

A further breakdown of these numbers is shown in Table 15a and b, where the number of units needed in each zone is shown. In addition, multi-family units are separated into apartments and multi-plexes for Chart 15a and b.

The percentages assigned to each zone are the percentage of dwelling units currently in each zone. This model assumes then that Stayton would continue its current housing ratios between the zones. To keep this ratio there needs to be enough land to accommodate 609 to 795 new units in Low Density (Column 3), 381 to 498 units in Medium Density and 196 to 256 units in High Density (Columns 4 and 5 respectively).

Table 15a: Estimate of Needed Housing Units by Structure Type, 2.4% Population Growth

Housing Type	Column 1	Column 2		Column 3		Column 4		Column 5	
	2020 Unit Projections	Needed Units for 2020 Projections		Low Density (50%)		Medium Density (33%)		High Density (17%)	
		2004	2003	2004	2003	2004	2003	2004	2003
Single- Family Detached	2,461	716	868	609	738	107	130	-	-
Apartments	673	196	242	-	-	-	-	196	242
Multi-Family Plexes	942	274	339	-	-	274	339	-	-
Total	4,076	1,186	1,449	609	738	381	469	196	242

Of the development in the Medium Density zone, 274 to 358 units would be multi-family

plexes and 107 to 140 would be single family units (Column 4). Therefore the zones that will need to gain the most units are the Low and Medium Density zones

Table 15b: Estimate of Needed Housing Units by Structure Type, 3.0% Population Growth

Housing Type	Column 1	Column 2		Column 3		Column 4		Column 5	
	2020 Unit Projections	Needed Units for 2020 Projections		Low Density (50%)		Medium Density (33%)		High Density (17%)	
		2004	2003	2004	2003	2004	2003	2004	2003
Single- Family Detached	2,680	935	1,087	795	924	140	163	-	-
Apartments	733	256	302	-	-	-	-	256	302
Multi-Family Plexes	1,025	358	423	-	-	358	423	-	-
Total	4,439	1,549	1,812	795	924	498	586	256	302

The forecasted acreages needed to accommodate these future units are shown in Table 16a and b. Actual net density represents the densities Stayton currently has. The density goals are determined from SMC Title 17 density standards for the Low, Medium and High Density Zones. Actual net density represents continuing the current density levels for the next 15 years. The density goal means increasing the density to meet the density goals set by Stayton's development code standards. Table 16a and b examine only the forecasted need of current conditions and regulations. The amount of land needed to meet the 2020 projections may vary if there are changes to the existing development code.

Table 16a: Estimate and Comparison of Needs by Housing Type for 2020, 2.4% Population Growth

Housing Type	Units needed to meet 2020 projections	Actual Net Density	Land Needed in Acres for Actual Net Density	City Density Goal	Land Needed in Acres for Density Goal
Single Family (LD)	609	3.5	174.6	4.8	126.8
Single Family (MD)	107	4.5	23.6	6.2	17.3
Multi-family Plexes (MD)	274	7.6	36.1	12.4	22.1
Apartments (HD)	196	14.2	13.8	13.0	15.1
Total	1,186	4.8	248.2	6.5	181.3

Table 16b: Estimate and Comparison of Needs by Housing Type for 2020, 3.0% Population Growth

Housing Type	Units needed to meet 2020 projections	Actual Net Density	Land Needed in Acres for Actual Net Density	City Density Goal	Land Needed in Acres for Density Goal
Single Family (LD)	795	3.5	228.0	4.8	165.7
Single Family (MD)	140	4.5	30.9	6.2	22.6
Multi-family Plexes (MD)	358	7.6	47.1	12.4	28.9
Apartments (HD)	256	14.2	18.1	13.0	19.7
Total	1,549	4.8	324.1	6.5	236.8

As Table 16a and b indicate, if Stayton continues to develop at current density levels, the city will require more land to accommodate the same number of dwelling units. If Stayton increases densities to the City Density Goal established by the Stayton Development Code, it will need 248.2 to 324.1 total acres for new development. If Stayton does achieve the density goals currently in the development code, it will need 181.3 to 236.8 acres to meet the forecasted needs.

The range of 181.3 to 236.8 acres represents the least amount that Stayton needs to meet the projected units for 2020. Table 17a and b show how many acres in each zone will be needed to accommodate those new dwelling units.

Looking at the data in Table 17a and b it is obvious that if Stayton is to meet its projected needs for 2020, the City will need to annex more land for all three residential zones into the city. Looking at the lower projection of 2.4% in Table 17a and the 3.0% projection in Table 17b, both require additional acreages to fulfill the needs of the City to 2020. The acres needing to be annexed to meet the projected needs of Stayton are conservative figures because the amount of buildable acres includes redevelopable land, land that may not be redeveloped at all. 26.1 acres of Low Density, 9.2 acres of Medium Density and 1.7 acres of High Density are identified as redevelopable land. Because of the questions regarding the true redevelopment potential for these properties they are not counted in Tables 17a and b. Therefore the column title “buildable acres” in Tables 17a and b are the same as Table 3, Column 4 “vacant acreage”

**Table 17a: Land Needed by 2020 and
Buildable Acres by Zone Within the City Limits
2.4% Population Growth**

Zone	Needed Acres	Buildable Acres	Additional Acres Needed
Low Density	126.8	78.6	48.2
Medium Density	39.4	7.7	31.7
High Density	15.1	4.2	10.8
Total	181.3	90.6	90.8

**Table 17b: Land Needed by 2020 and
Buildable Acres by Zone Within the City Limits
3.0% Population Growth**

Zone	Needed Acres	Buildable Acres	Additional Acres Needed
Low Density	165.7	78.6	87.0
Medium Density	51.5	7.7	43.8
High Density	19.7	4.2	15.4
Total	236.8	90.6	146.3

Going back to Table 1, there are 1,258.4 acres available between the city limits and the Urban Growth Boundary that are mostly undeveloped. This is land that can be annexed to satisfy the needs of the 2020 projections. However, as Map 4 illustrates, there is currently no land zoned for High Density between the city limits and the UGB according to the Comprehensive Plan zoning. Most of the land outside the city limits and inside the UGB is designated as Low Density. There are a few parcels of Medium Density, a small amount of commercial and industrial land and a large portion of public land, but Low Density makes up the majority of the land available for annexation.

Commercial, Industrial and Public Lands

Because Commercial, Industrial and Public Semi-Public lands have different zoning requirements they are analyzed separately from the residential lands. Density calculations are not done because there are no minimum or maximum lot sizes for these zones. The Public Semi-Public zone is an entirely different entity than any of the other

zones, encompassing park land, schools, churches and public facilities so it will be examined on its own.

Table 18. Supply of Commercial, Industrial, and Public Semi-Public Land Within City Limits

Zone Designation	Total Acreage		Developed Acreage		Vacant Acreage		Redevelopable Acreage		Net Buildable Acreage		Percent Buildable	
	2004	2003	2004	2003	2004	2003	2004	2003	2004	2003	2004	2003
Commercial	119.6	120.1	83.5	83.0	21.5	22.0	14.6	14.6	36.1	36.6	30.2%	30.5%
Industrial	361.9	361.9	271.4	270.4	86.6	87.6	4.0	4.0	90.6	91.6	25.0%	25.3%
Public Semi-Public	304.3	227.3	-	-	-	-	-	-	-	-	-	-
Total	785.9	709.3	354.8	353.3	108.1	109.6	18.6	18.6	126.7	128.2	16.1%	18.1%

Table 18 shows the overall totals for the three zone types. This table shows the large amount of land in the Public Semi-Public zone. The large increase in the acreage of the Public Semi-Public zone comes from two zone changes and a parcel merger that resulted in the creation of two new parks, Santiam Park and Riverfront Park, and an expansion of the Santiam Memorial Hospital property on 10th Ave.

There is also a substantial amount of industrial and commercial land in Stayton, and the chart shows that 30.2% of the commercial and 25.0 % of the industrial are available for development. Going back to Map 2, it is evident that the majority of the available industrial land is located in the forty-four acre Meier-Dozler property on the northwest corner of town. A substantial portion of the available commercial property is also located in a group of parcels adjacent to the Sylvan Springs development on the northeast side of town off of Cascade Highway.

Table 19 shows the breakdown of commercial property development.

Table 19: Supply of Buildable Commercial Lands within the City Limits by Zone

Zone Designation	Total Acreage		Developed Acreage		Vacant Acreage		Redevelopable Acreage		Net Buildable Acreage		Percent Buildable	
	2004	2003	2004	2003	2004	2003	2004	2003	2004	2003	2004	2003
Commercial General (CG)	82.8	82.8	64.2	63.7	7.1	7.6	11.6	11.6	18.7	19.2	22.5%	23.2%
Commercial Retail (CR)	30.4	30.4	17.2	17.2	10.1	10.1	3.0	3.0	13.1	13.1	43.1%	43.1%
Interchange Development (ID)	6.4	6.4	2.1	2.1	4.4	4.4	-	-	4.4	4.4	68.1%	68.1%
Total	119.6	119.6	83.5	83.0	21.5	22.0	14.6	14.6	36.1	36.6	30.2%	30.6%

The Interchange Development has the least available land for development of all the commercial zones. The Commercial Retail zone still has 43.1% or 13.1 acres of land available for development and the Commercial General zone has 22.5% or 18.7 buildable acres. The Commercial General zone has the most non-conforming development of any of the zones. This non-conforming land has been included in the redevelopable category in Table 19, giving the Commercial General zone the highest amount of redevelopable land. The non-conforming development can be seen in Map 5 along the 1st Street corridor. There is also a small part of the Light Industrial zone on the west side of town with non-conforming development, but the Commercial General zone has the majority of it. This non-conforming development reduces the total amount of land being used for commercial purposes. It also presents an opportunity for redevelopment. However, non-conforming development has many of the same issues as redevelopable land. The chances of redevelopment happening are lower because of increased costs. Also, unless a land owner is interested in redeveloping, the land will continue to be non-conforming and unused as commercial land.

The industrial districts, shown in Table 20, have most of their vacant land in the Light Industrial zone. There is no redevelopable land in the industrial zones except for the few parcels of non-conforming development in the Light Industrial zone. A large percentage of the Industrial Commercial zone still has vacant land, but the zone is small, there are only 5.4 acres available. The rest of the industrial land has been developed.

The need for additional commercial or industrial lands cannot be determined as easily as the need for residential land. First, there is the variety of uses and densities that can be used on industrial or commercial land. Second, there is no way to predict whether existing commercial and industrial land base is adequate for the future needs of the town because the conditions that would determine that need are partially dependent on the state-wide economy and changes in technology. This analysis therefore is beyond the scope of this analysis. The only conclusion drawn is that there are opportunities within both the commercial and industrial zones for further development and redevelopment.

The final part of this section is Public Semi-Public land in Stayton. There is a large quantity of Public-Semi Public land in Stayton. Some of this is in schools and churches, but there is also a significant quantity of parkland within the city that contributes to the amount of public land. This is most evident in Map 6. Map 6 shows just the Public Semi-Public lands within the city. There are a total of 304.3 acres of public land inside the city limits. The large portion of public land in the southeastern corner of the city is new parkland, added into the public semi-public zone in 2005.

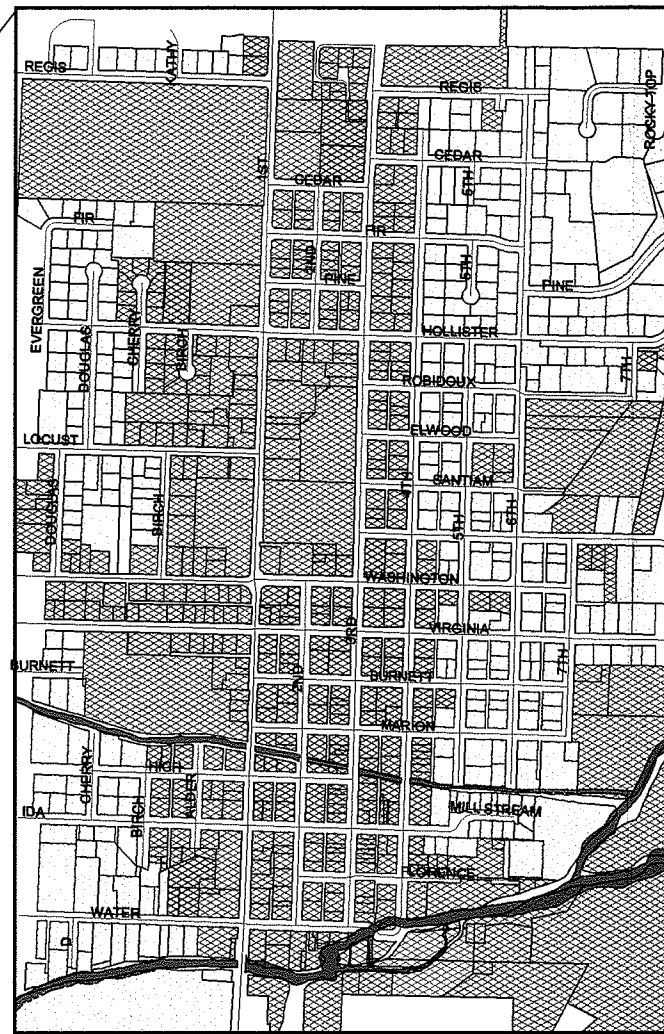
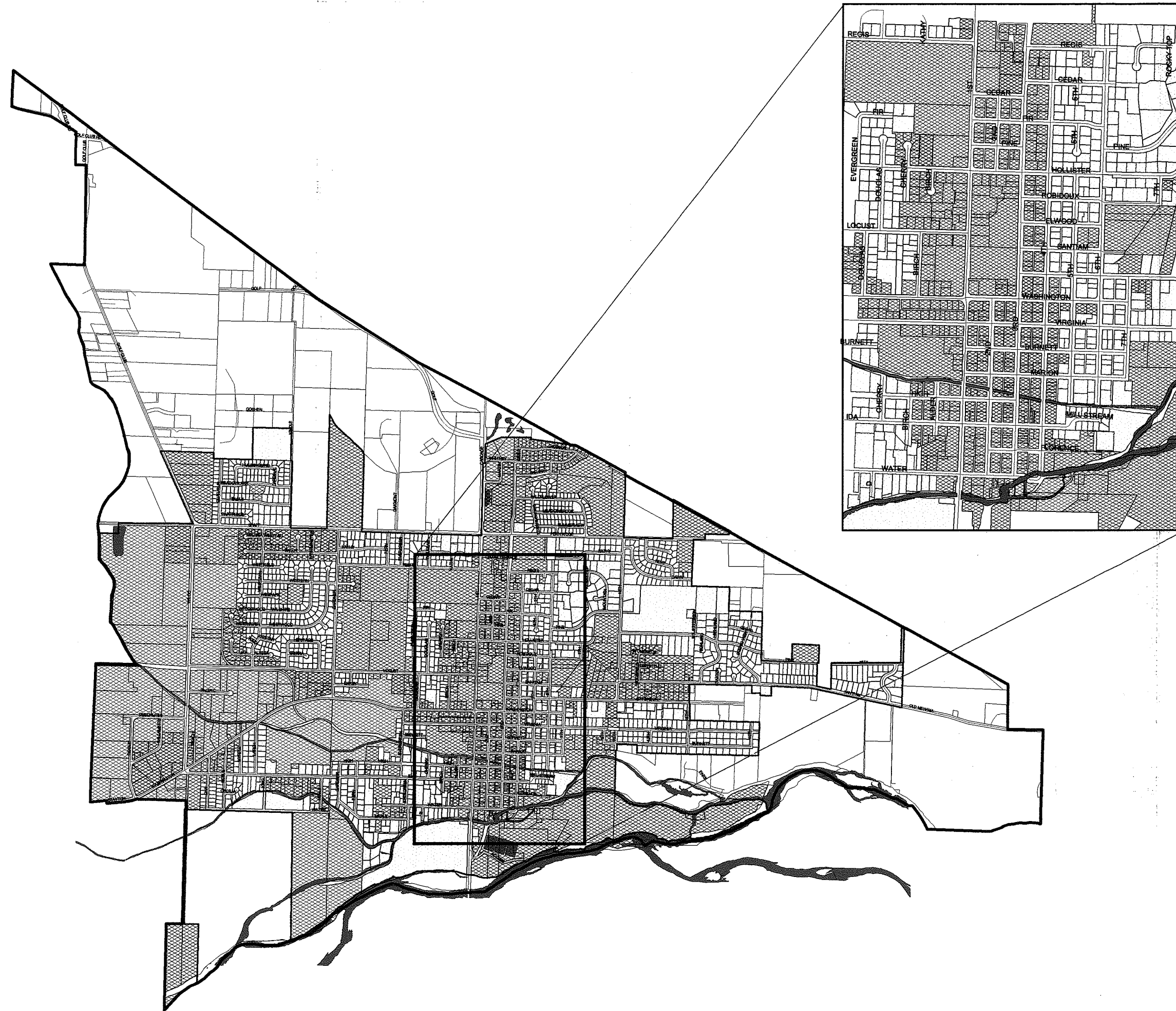
Table 20: Supply of Buildable Industrial Lands within the City Limits by Zone

Zone Designation	Total Acreage		Developed Acreage		Vacant Acreage		Redevelopable Acreage		Net Buildable Acreage		Percent Buildable	
	2004	2003	2004	2003	2004	2003	2004	2003	2004	2003	2004	2003
Light Industrial (IL)	287.4	287.4	202.3	201.3	81.1	82.1	4.0	4.0	85.1	86.1	29.6%	30.0%
Industrial Agricultural (IA)	56.9	57.0	56.9	56.9	0.01	0.01	-	-	0.0	0.0	0.0%	0.0%
Industrial Commercial (IC)	17.6	17.6	12.1	12.1	5.4	5.4	-	-	5.4	5.4	30.9%	30.9%
Total	361.9	361.9	271.4	270.4	86.6	87.6	4.0	4.0	90.6	91.6	25.0%	25.3%

Summary















- ✧ Development will occur over time in a sequential, planned fashion, with build-out of the Urban Growth Boundary assumed to occur beyond the fifteen year growth horizon presented here.
- ✧ To protect significant natural resources, policies need to be developed addressing wetlands and riparian areas.
- ✧ Single family homes predominate.
- ✧ To maintain the housing ratio, consideration will have to be given for additional multi-family housing and/or more medium density development.
- ✧ Low Density zoning predominates inside the city and OCIB.
- ✧ There is not enough land within the city limits to meet either the 2.4% or 3.0% growth scenario.
- ✧ Stayton needs a minimum of 90.8 to 146.3 acres for all three residential zones to meet either the 2.4% or 3.0% growth scenario.
- ✧ Stayton could find that there is not an adequate amount of commercially zoned land within the city for the 15 year growth scenario.

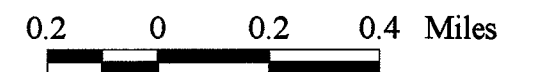
Buildable Lands Inventory Map 1 Zoning Within City Limits



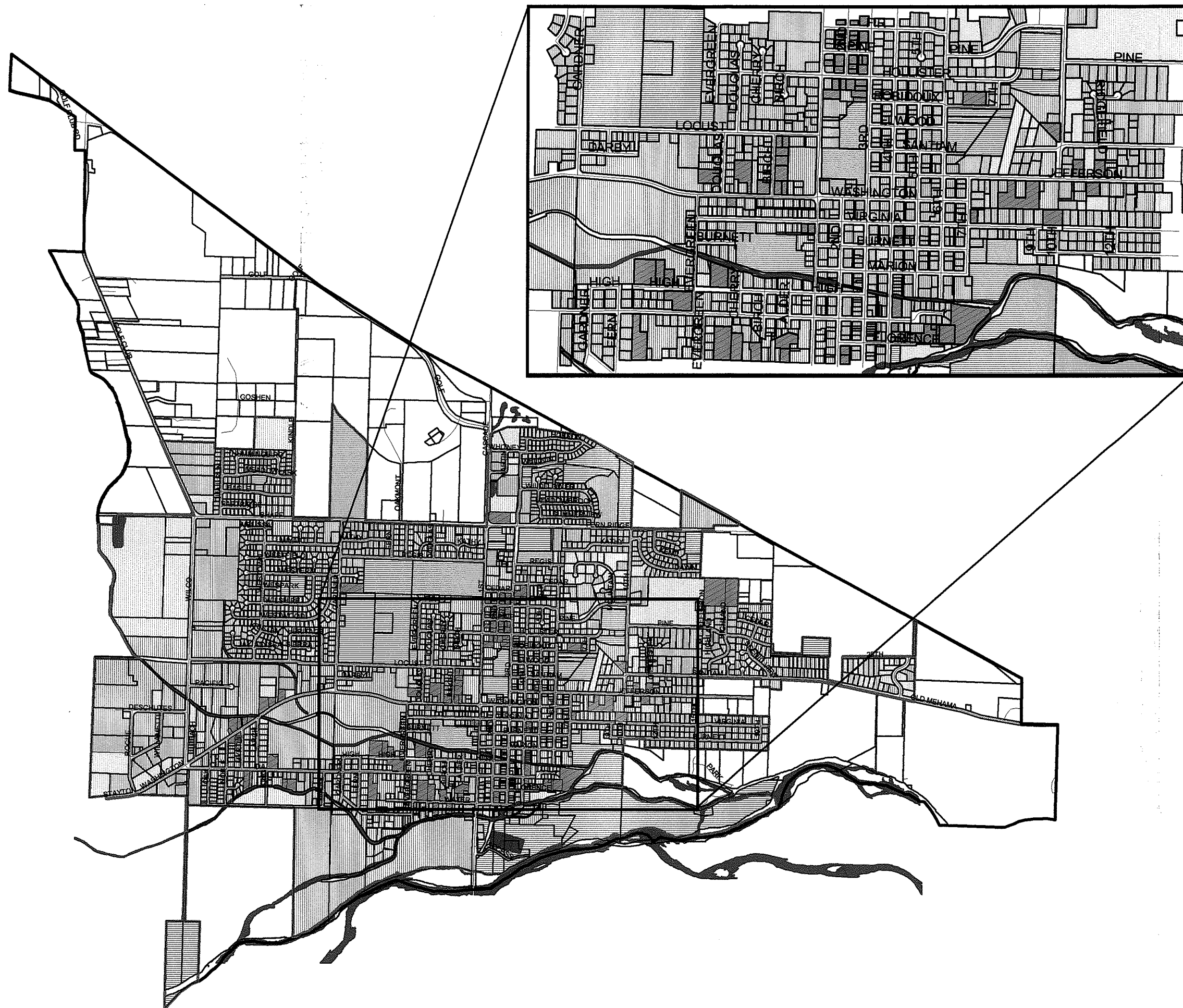
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Zoning










-  Low Density
-  Medium Density
-  High Density
-  Commercial General
-  Commercial Retail
-  Interchange District
-  Light Industrial
-  Industrial Agricultural
-  Industrial Commercial
-  Public Semi-Public
-  Roads
-  City Limits
-  UGB
-  Water

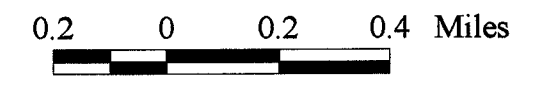


Buildable Lands Inventory Map 2 Land by Development Status



Legend

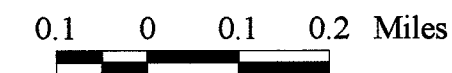
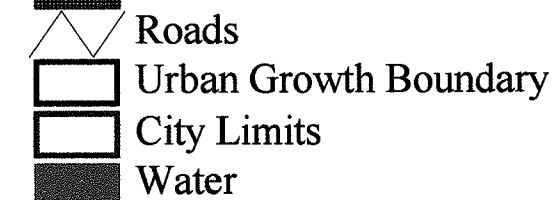
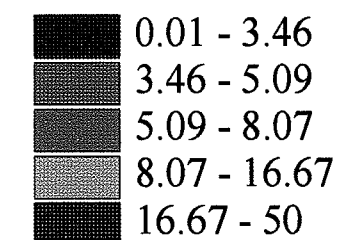
-  Undeveloped
-  Developed
-  Public Semi-Public
-  Redevelopable
-  City Limits
-  Urban Growth Boundary
-  Taxlots
-  Roads
-  Water



Buildable Lands Inventory Map 3 Density by Parcel Residential Development

Legend











Units per lot

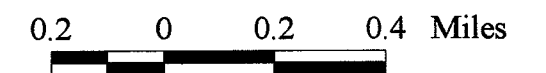
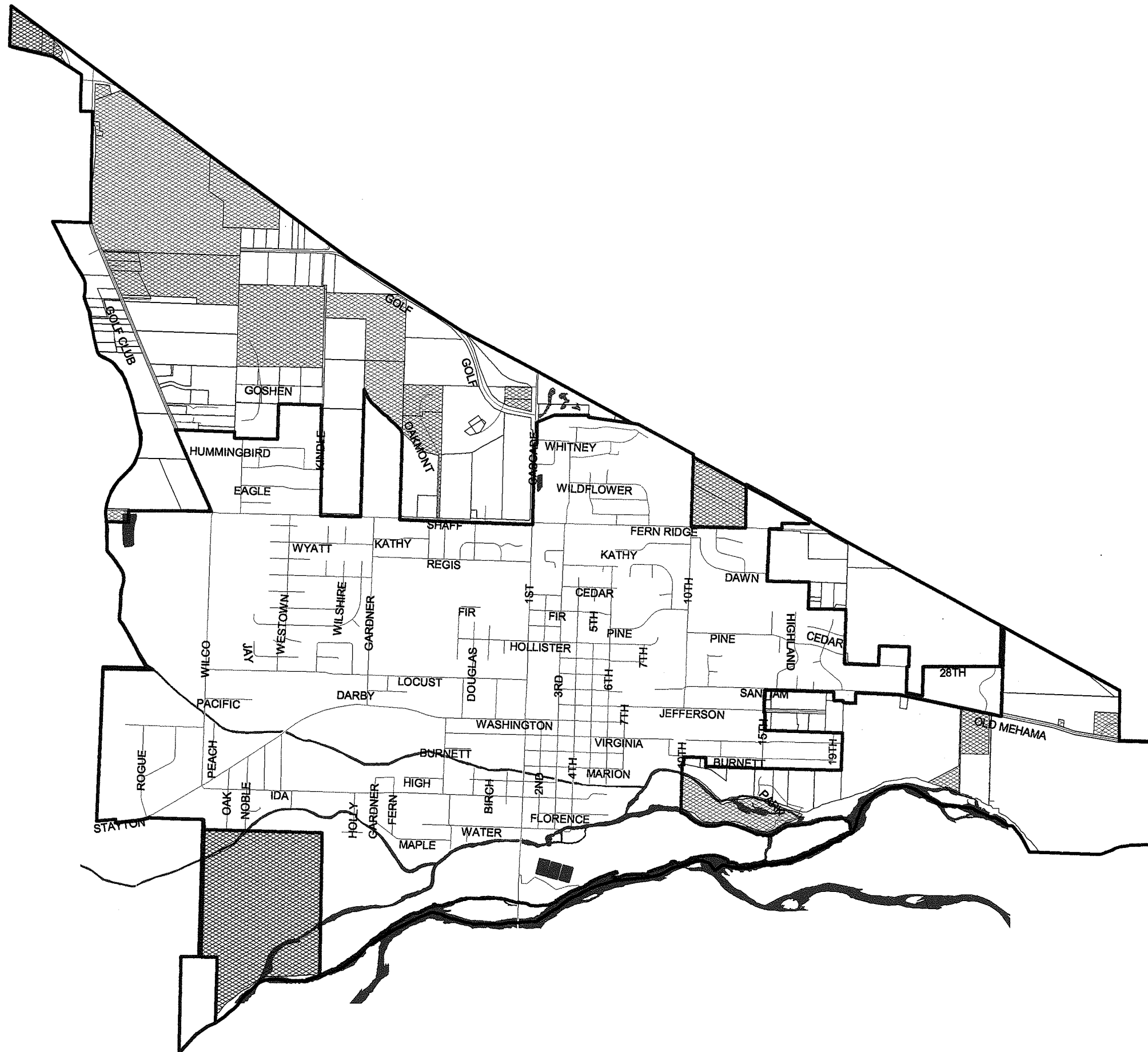


Buildable Lands Inventory
 Map 4
 Comprehensive Plan
 Zoning
 Land Between UGB
 and City Limits

Legend







Comprehensive Plan Zoning

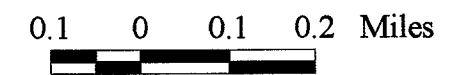
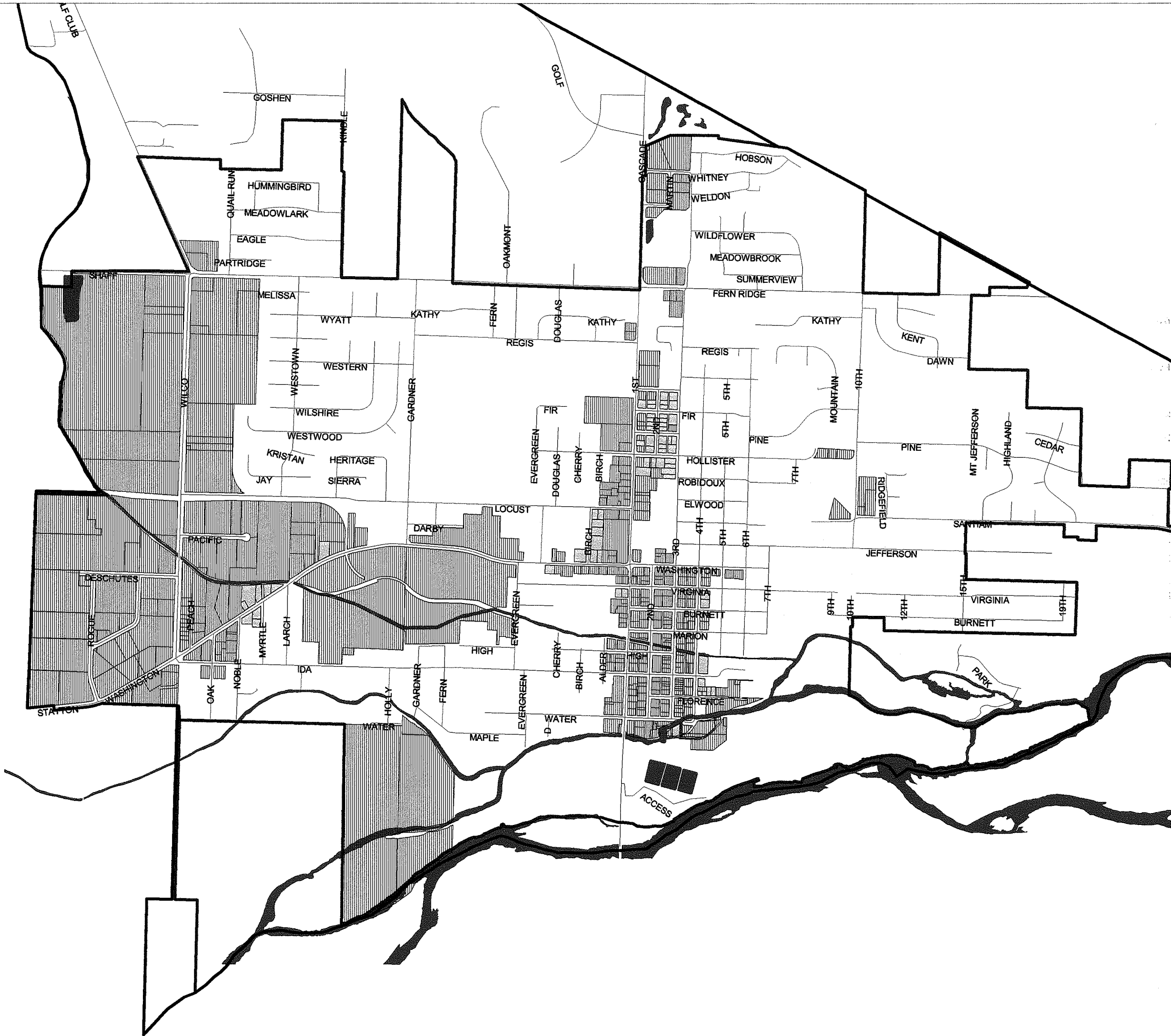
-  Low Density
-  Medium Density
-  Interchange District
-  Light Industrial
-  Industrial Agricultural
-  Public Semi-Public
-  Roads
-  City Limits
-  Urban Growth Boundary
-  Water



Buildable Lands Inventory Map 5 Non-Conforming Development In Commercial and Industrial Zones







Legend

-  Urban Growth Boundary
-  Conforming Development
-  Non-Conforming Development
-  City Limits
-  Roads
-  Water



Buildable Lands Inventory Map 6 Public Semi-Public Lands

Legend

-  Public Lands
-  Taxlots
-  City Limits
-  Urban Growth Boundary
-  Roads
-  Water



0.2 0 0.2 0.4 Miles

