

From: gomolls@wvi.com
To: [Jennifer Siciliano](mailto:jennifer.siciliano@staytonoregon.gov)
Cc: cargon55@gmail.com; aaronfrichel@gmail.com; rjbmitch@gmail.com
Subject: Re: Land Use File #5-02/24
Date: Monday, November 17, 2025 5:14:56 PM
Attachments: [Technical Comment Letter.pdf](#)

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Hello Ms Siciliano, I have attached a document that I would like to be included in the packet that goes to the city Commissioners for their review prior to the November 24 meeting. I would also appreciate the opportunity to speak to the Commissioners concerning this annexation.

Thank you,

Carl Gomoll
12174 Golf Lane SE
Sublimity, OR 97385
503.930.5173

From: Jennifer Siciliano <jsiciliano@staytonoregon.gov>
Sent: Thursday, November 13, 2025 4:26 PM
To: gomolls@wvi.com <gomolls@wvi.com>
Subject: RE: Land Use File #5-02/24

Hello Carl,

You may find the relevant documents for the annexation on the Planning Commission's webpage under "Public Hearings" and under the November 24, 2025, meeting. Here are direct links to Revised Narrative Package (incomplete application response) dated July 15, 2025 (https://www.staytonoregon.gov/page/open/5842/0/BRAND_Response_to_Incomplete_Letter_.pdf.pdf) , and the previous submittal dated March 26, 2025 (https://www.staytonoregon.gov/page/open/5842/0/KSD_Stayton_Annexation_Narrative_Package.pdf).

Staff documents are usually available on Monday (11/17/2025) evening and will be posted on the same webpage under "Public Hearings" under the Land Use File #5-02/24.

Sincerely,

Jennifer Siciliano, AICP
Community and Economic Development Director

311 N. 3rd Ave
Stayton, OR 97383
Phone 503-769-2998

From: gomolls@wvi.com <gomolls@wvi.com>
Sent: Thursday, November 13, 2025 1:25 PM
To: Jennifer Siciliano <jsiciliano@staytonoregon.gov>
Subject: Land Use File #5-02/24

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Dear J Siciliano,

Date: November 17, 2025

To: City of Stayton Planning Commission & City Council

Subject: Technical Comment Letter – Proposed Annexation & Subdivision of Tax Lot 091W03B001500 (KSD Properties, LLC Development)

From: Golf Lane SE Residents' Coalition

1 Summary

We respectfully oppose—or, in the alternative, ask that you heavily condition—the proposed annexation and 74-lot subdivision because it conflicts with the Transportation System Plan (TSP), Storm-Water Master Plan (SWMP), Comprehensive Plan (Comp Plan), and Economic Development Strategy (EDS). The project would shift long-term costs and risks onto existing residents while yielding few citywide benefits.

2 Transportation Findings

- **New peak-hour traffic.** KSD Properties, LLC's Transportation Impact Analysis (TIA) forecasts 69 a.m. and 92 p.m. peak-hour trips for the subdivision. We are not sure if this considers the current 15 households on Golf Lane.
- **Current loads are already high.** The City's Transportation System Plan (TSP) counts show 1,000-1,800 vehicles each peak hour at the four Cascade Hwy intersections that "book-end" Golf Lane. The above increase would amount to approximately 6% more volume.
- **Applicant's Transportation Impact Analysis (TIA).** This evaluates 2028 operations with and without the project. At Golf Lane/Cascade Hwy (two-way stop control on Golf Lane), the PM peak goes from a delay of 29.9 seconds (LOS D) and $v/c \approx 0.17$ (No-Build Project) to a delay of 37.0 seconds (LOS E) and $v/c \approx 0.21$ (Build Project). In plain terms: longer average waits for Golf Lane drivers, even though the movement's v/c remains low on Golf Lane. The applicant's narrative reiterates that signal warrants are not met at Golf Lane and that realignment is not yet warranted under current forecasts.
- **Traffic Gaps.** Right Turn on Red (RTOR) at Whitney/Cascade intersection (NB) and at the OR-22 EB ramp/Cascade intersection (SB) keeps traffic streams moving during red phases, reducing the "quiet" windows a side street like Golf Lane depends on. With a posted 45 mph corridor, drivers often accelerate quickly as they clear the interchange, which shortens acceptable gaps and makes it harder for Golf Lane drivers to enter.
- **Percent increases look small on paper—but are concentrated.** A 6-10 % jump spread across an hour is still an extra vehicle every 30–40 seconds during the busiest minutes, all forced to merge or wait for gaps on Cascade Hwy.

- **Intersection failure.** Even with traffic light re-timing, the Cascade Hwy / Shaff-Fern Ridge intersection fails Marion County mobility standard for the p.m. peak.
- **Further Annexation/Urban Development.** The TSP notes further growth could add enough trips to trigger the M3 project to realign Golf Lane with the Whitney St signal. The signal would be justified when volume and/or safety warrants are met. The TSP lists Project M-3 - Golf Lane realignment to Whitney St at \$3.3 million, unfunded high priority (TSP Project List p. 50). No contribution is offered by KSD Properties, LLC application.
- **Collector upgrade.** The TSP also designates Golf Lane SE as a future *Collector* from Cascade Hwy to Golf Club Rd at an estimated \$8.2 million (Project M-7, p 50). No contribution is offered by KSD Properties, LLC application.
- **Crash history.** ODOT's 2015-2020 dataset records a fatal crash at Whitney St / Cascade Hwy in 2017, evidencing existing safety risk (ODOT Crash Stats 2015-20).

3 Storm-Water & Floodplain Findings

- **System at capacity.** The SWMP states that "high runoff volumes tax the existing system beyond capacity; flooding and ponding are common" (SWMP p. 4-12). Ultimately 45% of Stayton Storm Water Sheds drain to Mill Creek, Lucas Ditch and Mill Creek basin (SWMP p. 2.7). The subdivision's 21 acres of runoff will fill another ditch to the northwest which was never intended for this use that will add more runoff to Mill Creek. Mill Creek floods twice or more a year currently within the Mill Creek Basin. The additional runoff could cause more flooding and failures to current septic's and wells. The application does not site detentions or swales.
- **Mill Creek Basin.** Basins 11, 15C, 15B and 19 do not have enough cover above the water table to reasonably collect runoff from other upstream basins, therefore local detention is the best option for this basin. The city currently has a policy of requiring onsite detention for redevelopment that would affect this basin.
- **Missing downstream model.** City design standards require hydraulic analysis through the 100-year event; no such study accompanies the proposal.

4 Utility & Fiscal Impacts

- **Water extension cost.** The nearest 12-inch main is 2,100 ft south of Golf Ln at Cascade Hwy & Whitney St; an extension plus booster station is unbudgeted
- **Future assessments.** If Golf Lane is later annexed, owners may be required to abandon wells and septic's and pay system-development charges.

5 Housing, Residential Saturation & Socio-Economic Considerations

- **Zoning & Density.** The proposed subdivision adds 74 new urban lots with streetlights, sidewalks, and curb-and-gutter infrastructure, which will alter the semi-rural character of the surrounding properties.
- **Rapid housing build-out.** Stayton has added 74 apartments (2023) and 100 apartments (2024), with 74 more single-family lots now proposed—a net gain of 248 dwellings in two years (Building Permit Log 2023-24).
- **Job stagnation.** The TSP employment analysis shows total jobs declined from 2005 to 2020 and remain below 2005 levels. The City's Economic Development Strategy cites *"lack of job growth"* and *"lack of new commercial investment"* as top weaknesses.
- **Commuter pressure.** More homes without parallel job creation will drive up-valley commuting, aggravating peak-hour congestion at Cascade Hwy and on the future Golf Lane collector.
- **Economic mismatch.** Additional units risk a higher proportion of lower-income households without a corresponding rise in family-wage employment or commercial tax base.
- **Public-service burden.** Residential growth that outpaces employment growth leaves the City reliant on existing homeowners to fund major projects—e.g., the \$8.2 million collector upgrade and regional storm-water pipes.

6 Consistency Matrix

Adopted Policy / Goal	Citation	Consistency Issue
Natural Resources	Comp Plan Goal NR-2 – Minimize flood damage	No downstream flood study; ditch discharge may raise twice-annual floods.
Economic Development	EDS Goal 1 – Increase family-wage jobs	Housing growth outpaces stagnant job base; no mitigation.

Adopted Policy / Goal	Citation	Consistency Issue
Transportation	TSP – Safe multimodal network	\$8.2 M collector & \$3.3 M realignment unfunded; safety degraded.

7 Requested Conditions (or Grounds for Denial)

1. **Transportation** – Developer must dedicate right-of-way and fund a proportionate share of the \$8.2 M collector upgrade and the \$3.3M Cascade Hwy intersection improvements before final plat.
 - **Post-occupancy checks at Golf Lane/Cascade Hwy**
 - . Within 6–12 months of full occupancy and again at 24 months, require turning-movement counts and an HCM two-way-stop update that shows the north–south Cascade Hwy volumes used, the side-street delay/LOS, and v/c (AM/PM, no-build vs. build). If PM delay exceeds LOS E/F on two consecutive counts or MUTCD signal warrants are met, initiate the realignment scoping and assign proportionate share.
 - **Document the corridor realities in the record.** Add a short memo confirming RTOR permissions at Whitney/Cascade and OR-22 EB/Cascade and the posted 45-mph segment, and to explain how these factors reduce usable gaps for Golf Lane (with the HCM inputs noted above).
 - **Pilot “gap-creation” operations (with ODOT/County).** Prepare a ready-to-use pilot for peak-hour “No Turn on Red” at one or both signals and minor coordination retuning to deliver short gap windows downstream. Measure before/after gaps at Golf Lane, side-street delay, and queues at the signals to confirm no adverse effects. (The interchange plan already calls for signal coordination on Cascade Hwy due to close spacing.)
 - **Speed/arrival review.** Coordinate a speed-zone/arrival check between Whitney and Golf Lane; consider speed-feedback or minor progression tweaks that slightly lengthen headways without degrading corridor progression.
 - **Frontage & access.** With subdivision build-out, complete standard frontage along Golf Lane (bike lanes/planter strips/sidewalks) and a Construction Traffic Management Plan to avoid peak-hour adds at Golf Lane/Cascade.

- **Trip-distribution transparency.** Place the study's trip generation and distribution in the record and compare observed routing in monitoring reports; if more site traffic uses Golf Lane than assumed, update the HCM results and mitigation accordingly.
- 2. **Storm-Water** – Provide a Mill Creek-based hydraulic model; construct on-site detention for the post-development 100-year storm with recorded maintenance covenants.
- 3. **Utilities** – Record a covenant barring forced utility hookups, assessments, or annexation of existing Golf Lane properties without written consent from land owners.
- 4. **Phasing** – Limit building permits to 20 until off-site infrastructure—collector improvements, water main, and regional storm facilities—is fully operational and accepted by the City.

8 Conclusion

Because the application conflicts with multiple adopted plans—and would shift long-term traffic, flooding, and fiscal burdens onto existing homeowners—we request denial of File #5-02/24 or, at minimum, the imposition of the protective conditions above.

9 References

1. **TIA** – Brand Transportation Impact Analysis (KSD Properties, Jul 2025).
2. **TSP** – Stayton Transportation System Plan Update (Adopted 2022).
3. **SWMP** – Stayton Storm-Water Master Plan (Adopted 2021).
4. **Comp Plan** – Stayton Comprehensive Plan (Amended 2024).
5. **PW Design Standards** – City of Stayton Public Works Design Standards (2023).
6. **Water Master Plan** – City of Stayton Water Master Plan (2019).
7. **ODOT Crash Data** – Oregon Department of Transportation Crash Statistics, 2015-2020.
8. **Brand Prelim Plat** – Brand Development Preliminary Plat Set (Aug 2025).
9. **Stayton Economic Development Strategy** (2019-2024)
10. **Building Permit Log** (2023-2024)

Prepared for submission by the Golf Lane SE Residents' Coalition.

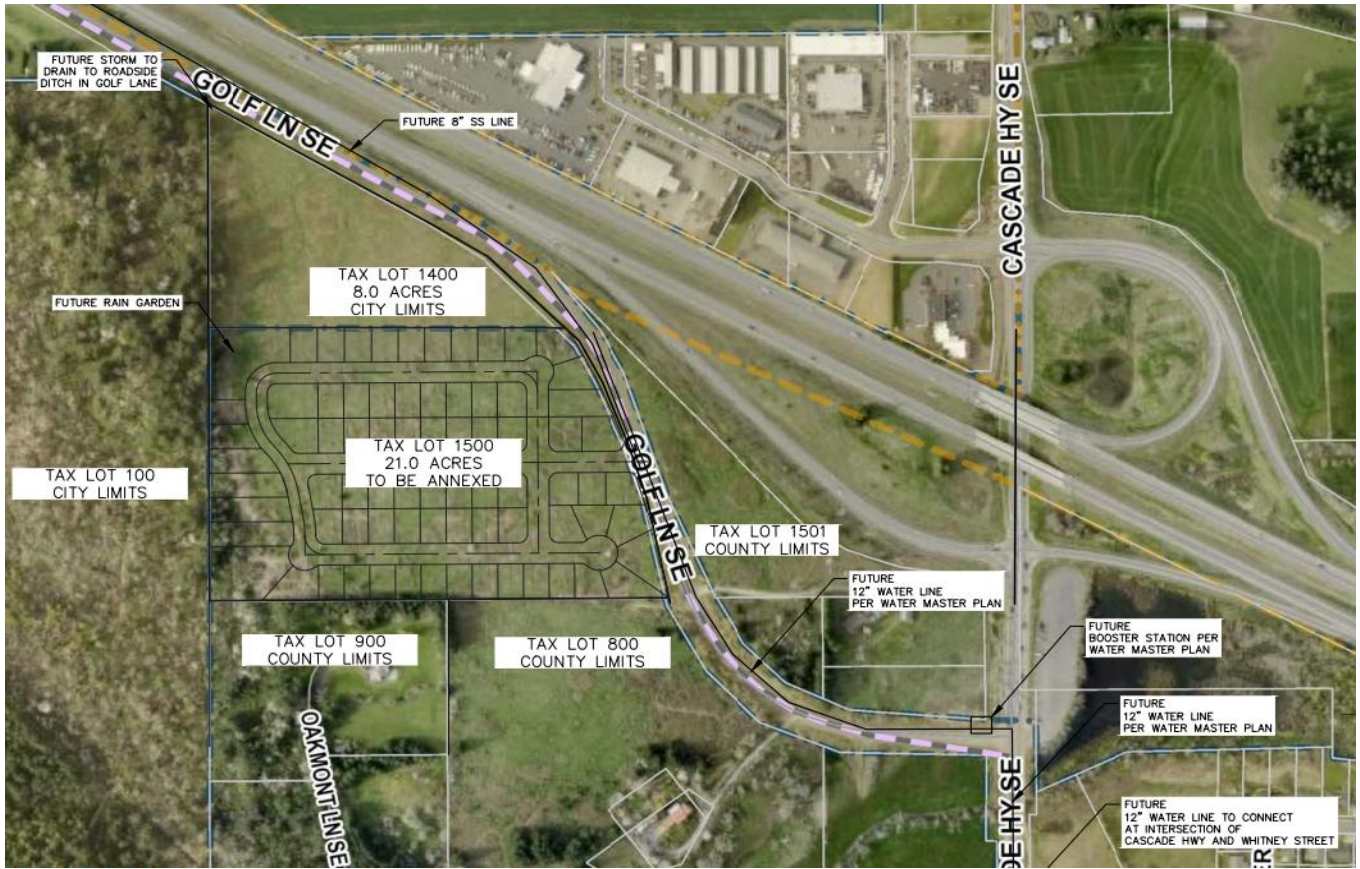


Figure 8. Roadway Functional Classification Map

