

**Exhibit B – Narrative Statement in Support of Comprehensive Plan Map Amendment and Zoning Map Amendment**

**579 East Washington Street, Stayton, Oregon**

- 1. The amendment is consistent with the goals and policies of the Comprehensive Plan, including any relevant area plans, and the statewide planning goals. In the case of a Comprehensive Plan Map amendment, the requested designation for the site shall be evaluated against relevant Comprehensive Plan policies and the decision authority shall find that the requested designation on balance is more supportive of the Comprehensive Plan as a whole than the old designation.*

Downtown Residential Mixed Use district is intended to provide opportunities for “residential, commercial and mixed use developments as part of the downtown area,” and is intended to become a neighborhood of mainly moderate-density residential uses while also allowing appropriate commercial uses and mixed-use development. The downtown zoning provisions further state that these districts implement the Downtown Stayton Transportation & Revitalization Plan, which envisions a pedestrian-oriented district accommodating intensive commercial, residential, and mixed-use development.

The requested amendment is more supportive of the Comprehensive Plan as a whole than the existing low-density residential designation because the subject property is already improved with a nonconforming church building rather than a detached single-family dwelling pattern that the low-density designation is intended to preserve. The requested change would reduce the inconsistency between the existing built form and the mapped designation by assigning a downtown mixed-use designation to a parcel already developed with an urban-scale institutional structure capable of adaptive reuse. That form of reuse advances Comprehensive Plan objectives favoring efficient use of land, reinvestment in developed areas, a wider range of activity and housing opportunities in and around downtown, and a land use pattern that better coordinates with urban services and pedestrian access.

The proposal is also consistent with relevant statewide goals, particularly Goal 2 (Land Use Planning), Goal 9 (Economic Development), Goal 10 (Housing), Goal 11 (Public Facilities and Services), Goal 12 (Transportation), Goal 13 (Energy Conservation), and Goal 14 (Urbanization). Oregon’s statewide planning framework requires local comprehensive plans and implementing regulations to be consistent with those goals, and this amendment supports urban redevelopment and a more compact land use pattern within city limits rather than outward expansion.

*2. The current Comprehensive Plan does not provide adequate areas in appropriate locations for uses allowed in the proposed land use designation and the addition of this property to the inventory of lands so designated is consistent with projected needs for such lands in the Comprehensive Plan.*

The subject property has historically been used as a church building that is already non conforming within the LD designation. As a practical matter, the existing map designation underutilizes a developed site located on East Washington Street and does not adequately accommodate adaptive reuse of the existing structure for a low-impact instructional use such as a dance school.

The requested designation also responds to a limited inventory of downtown-designated land. The Stayton Comprehensive Plan's buildable lands inventory shows that, citywide, downtown-designated land is relatively scarce compared with residential, commercial, and industrial categories. Within city limits, the Plan identifies only 35 gross acres of downtown land, including 22 gross acres in the DRMU zone, and only 4 vacant and 1 buildable properties within the downtown categories. The Plan further notes that there is no land designated for downtown uses outside the city limits but inside the urban growth boundary, meaning the downtown land supply is inherently constrained. Adding this property to the downtown inventory is therefore consistent with the need to maintain and modestly expand opportunities for downtown-compatible mixed-use redevelopment without requiring expansion into undeveloped fringe areas.

On balance, the addition of this parcel to the downtown mixed-use inventory is a modest, site-specific adjustment that better aligns the map with existing conditions, supports downtown reinvestment, and incrementally increases the supply of land available for downtown-compatible uses, including mixed-use and residential opportunities contemplated by the Comprehensive Plan and downtown revitalization planning documents.

*3. Compliance is demonstrated with the statewide land use goals that apply to the subject properties or to the proposed land use designation. If the proposed designation on the subject property requires an exception to the Goals, the applicable criteria in the LCDC Administrative Rules for the type of exception needed shall apply*

Goal 1 is in regard to citizen involvement. The application is subject to the public hearing standards established in SMC 17.12.090 and 17.12.100 and Oregon Revised Statutes 227.160 to 186

Goal 2 is in regard to land use planning. The City's adopted Comprehensive Plan was acknowledged by the Department of Land Conservation and Development (DLCD) in May 2013. No exception is required whereas this is an amendment within the existing city limits.

Goal 3 is in regard to the preservation of agricultural lands. The property for this application is located inside the City Limits and zoned with City urban development zones.

Goal 4 is in regard to the preservation of forest lands. The property for this application is located inside the City Limits and zoned with City urban development zones.

Goal 5 is in regard to open spaces, scenic and historic areas, and natural resources. There are no "Goal 5 Resources" identified in the Comprehensive Plan on or adjacent to the subject properties

Goal 6 is in regard to air, water and land resources. The property for this application is located inside the City Limits and zone with City urban development zones.

Goal 7 is in regard to areas subject to natural disasters and hazards. There are no identified natural hazards on this property.

Goal 8 is in regard to recreation. The City has a Parks Master Plan that addresses the recreational needs of the community. This property is not identified for any future recreational facilities.

Goal 9 is to provide adequate opportunities for a variety of economic activities. The DRMU amendment to the subject property would support this by increasing the opportunity for economic activity in the City and would implement the adopted Economic Development Strategy of supporting the expansion of existing business as well as reinvesting in a preexisting building

Goal 10 is to provide for the housing needs of the state. The proposed amendment would not decrease the amount of land used because the DRMU district is expressly intended to allow moderate-density residential and mixed-use development, thereby expanding rather than restricting housing opportunities over time. According to City of Stayton Comprehensive Plan, there are 921 residential acres with 114 vacant and 138 buildable lots whereas there are only 22 acres and 1 buildable lot within the DRMU zoning.

Goal 11 is to plan and develop a timely, orderly and efficient arrangement of public facilities and services. The parcel is served by public water and sewer without any extension of facilities needed.

Goal 12 is to provide and encourage a safe, convenient, and economic transportation system. The City has an adopted Transportation System Plan. The applicant submitted an analysis of potential impacts of the Comprehensive Plan Map amendment on the transportation system. The analysis was prepared by Chris Clemow, PE, PTOE. The analysis estimated that under current LD and Residential designation the worst-case traffic generation would be 1 peak hour trips. The analysis projected traffic generation from a medical-dental office building as the worst-case scenario under the proposed zoning, with a net increase of 14 peak hour trips. The analysis concluded that all of the study intersections would function within their applicable mobility standards under a worst-case scenario for the proposed changes.

Goal 13 is 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. The proposed amendment does not impact the City's urban growth boundary and is completely within City Limits.

Goals 15-19 are regarding the Willamette River Greenway, estuarine resources, coastal shorelands, beaches and dunes, and ocean resources, respectively. The City is not located on the Willamette River or on the Oregon Coast.

*4) Existing or anticipated transportation facilities are adequate for uses permitted under the proposed designation and the proposed amendment is in conformance with the Oregon Transportation Planning Rule (OAR 660-012-0060)*

The applicant submitted an analysis of potential impacts of the Comprehensive Plan Map amendment on the transportation system. The analysis was prepared by Chris Clemow, PE, PTOE. The analysis estimated that under current LD and Residential designation the worst-case traffic generation would be 1 peak hour trips. The analysis projected traffic generation from a medical-dental office building as the worst-case scenario under the proposed zoning, with a net increase of 14 peak hour trips. The analysis concluded that all of the study intersections would function within their applicable mobility standards under a worst-case scenario for the proposed changes.

The proposal does not redesignate the property for an intensive auto-oriented use, does not require a change in roadway functional classification, and does not appear likely to materially degrade the performance of existing transportation facilities. Rather, it would reuse an existing structure for an instructional use in an area where walking, short local trips, and downtown access are anticipated parts of the transportation context.

*5) The current Comprehensive Plan Map provides more than the projected need for lands in the existing land use designation*

There are 1,825 acres of land in the UGB currently designated as Residential. The Comprehensive Plan indicates that there are 921 buildable acres of land inside the UGB, and outside the City Limits. Since that time, there have been about 73 acres of residential land annexed. The Plan also indicates that the City will need approximately 460 acres of land for residential development over the course of the planning period, and that there were 144 acres of buildable land in the city zoned for residential use. The Comprehensive Plan indicates that there were 950 acres of land designated for residential growth in the urban growth area. This amendment will not create a deficiency in lands designated for the existing low-density residential category. The Stayton Comprehensive Plan identifies a substantial inventory of land in the low-density residential designation. The buildable lands inventory shows that low-density residential land is the largest single zoning category in the city, with **667 gross acres** and a significant amount of vacant and redevelopment-capable land. By contrast, downtown-designated land is comparatively limited. Removing one already-developed parcel from the low-density inventory therefore will not materially impair the City's ability to meet

projected need for low-density residential land, particularly where the site is currently occupied by a nonconforming church building rather than contributing to the low-density detached housing stock in the manner originally contemplated by the designation.

For that reason, the current map provides more than adequate low-density residential land to absorb the loss of this single parcel, while the proposed amendment better serves the City's need for flexible downtown-compatible land supply.

*6) Public facilities and services necessary to support uses allowed in the proposed designation are available or are likely to be available in the near future.*

The public facilities and services necessary to support the uses allowed in the proposed designation are available, or are likely to be available in the near future, because the subject property is already developed and located within the city. The site has historically been served as an institutional use and is not an undeveloped greenfield requiring major extension of urban infrastructure. Water, sewer, storm drainage, police, fire, and street access are therefore either already available or can reasonably be expected to continue to serve the site subject to ordinary development review and utility connection requirements.

There is a 12 -inch water main in E Washington St. There is an 8- inch sewer main in E Washington St. There is a 10-inch storm main in E Washington St.

*7) Uses allowed in the proposed designation will not significantly adversely affect existing or planned uses on adjacent lands.*

Neighboring properties to the east are all single family dwellings, Neighboring properties to the south or in the DRMU corridor and consist of a law office, a single family dwelling and a dental office, properties to the west are all single family dwellings and properties to the north are single family dwellings. The proposed zone change will not significantly affect an existing or planned transportation facility, and TPR and Stayton Municipal Code criteria are satisfied without additional analysis.