

From: [Melanie Raba](#)
To: [Jennifer Siciliano](#); [Alissa Angelo](#)
Subject: FW: Ordinance No. 26-003 Golf Ln Annexation.
Date: Friday, May 15, 2026 10:01:37 AM
Attachments: [Golf Ln and Golf Club Presentation.pptx](#)
[May 18 City Council Testimony.docx](#)
[image001.png](#)

Good morning,

Please note below from Carl.



Melanie Raba
Administrative Special Projects

362 N. 3rd Ave
Stayton, OR 97383
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From: gomolls@wvi.com <gomolls@wvi.com>
Sent: Friday, May 15, 2026 8:45 AM
To: Melanie Raba <mraba@staytonoregon.gov>
Cc: Carlos Gonzales <cargon55@gmail.com>; Aaron Frichtl <aaronfrichtl@gmail.com>; rjbmitch@gmail.com
Subject: Ordinance No. 26-003 Golf Ln Annexation.

CAUTION: This email originated from **Outside Your Organization**. Exercise caution when opening attachments or on clicking links from unknown senders. Please contact Information Technology for assistance.

Please find attached my written rebuttal and testimony regarding the proposed annexation of Golf Lane Ordinance No 26-003, as well as related upcoming annexations within the Stayton Urban Growth Boundary.

I formally request that all two attached files be entered into the official City Public Hearing records for the City Council's review.

The attached files include:

- **1. Testimony (Main Document):** This document addresses the broader issues across all the proposed annexations. It outlines the data showing a lack of proven need/demand, the economic consequences of building homes without corresponding jobs, and the fiscal irresponsibility of approving growth against our current infrastructure deficits.
- **2. PowerPoint Presentation:** The slide deck that accompanies and illustrates the data presented in the main Testimony document.

Unfortunately I will not be able to attend.

Thank you for your time and assistance in ensuring these documents are added to the record.

Sincerely,

Carl Gomoll Golf Lane Resident Coalition

Mayor and members of the City Council, my name is Carl Gomoll, and I live at 12174 Golf Lane. I am here today to speak regarding the proposed annexation of Golf Lane. I will demonstrate that this application completely fails to meet our legal standards for demonstrating a true community need for housing and the provision of adequate public services.

Let me put my bottom line up front: we do not have a required need for more buildable land, which is a mandatory statutory benchmark for any annexation approval. In our 2013 comprehensive plan baseline, Stayton had 106 acres of vacant buildable land inside city limits, and the city has since annexed another 60 acres, establishing a total historical pool of 166 residential acres. Meanwhile, the new Oregon Housing Needs Analysis mandates that our city only needs to accommodate 1,058 total dwellings over the next 20 years. Out of the 166 acres of buildable land available to us, our city has completed seven developments that utilized 49.14 acres of that pool, leaving 116.86 acres of unbuilt land sitting within our existing boundaries today. Per Stayton's own zoning framework, those remaining 116 acres alone can comfortably absorb 696 low-density dwellings, 1,392 medium-density dwellings, or anywhere between 1,508 to 2,784 high-density multifamily units. On top of that internal capacity, the city recently approved the Golf Club Road annexation, which added another 59.63 gross acres of land, pushing our total inventory to 225.63 acres. That property was approved for Medium Density zoning with 126 lots, giving it the standalone capacity to place 534 dwellings onto our market.

As you can see from these numbers, between the land we already have inside city limits and our recent approvals, Stayton has almost four to five times the buildable land required to meet our long-term mandates under the Oregon Housing Needs Analysis. There is absolutely no justification to annex any more land, especially when we are failing to add middle-income businesses and jobs to support this growth. If you subtract the 534 dwellings provided by the Golf Club Road project from our total 20-year state allocation of 1,058, it leaves us with a remaining community need of just 524 more dwellings. Our current, unbuilt 116 acres within the existing city limits provide far more than enough acreage to account for those remaining 524 dwellings without expanding our boundaries any further.

Furthermore, developing Golf Lane will force more stormwater runoff directly into the over-capacity Mill Creek Basin. Granted, the developers will connect to our city systems, but the critical point is that the Mill Creek Basin stormwater system is already severely over-extended . The City is currently sitting 44 million dollars in the hole with an infrastructure deficit it cannot fund, meaning we are unable to fix this existing structural failure before adding more demand to it. This massive backbone issue is not something the Golf Lane developers can or will fix; it is a long-term liability that will be borne entirely by Stayton taxpayers. Because a safe and sufficient system cannot be provided to handle this water, it defeats the legal standard of public serviceability required for this property to be annexed . The slides and data below document these facts, and for these reasons, I urge the City Council to deny this application.

Effective this year, the state's new Oregon Housing Needs Analysis dictates a 20-year need for 1,058 dwelling units of which 40% of that need is for 475 households requiring households to make less than 56,000 a year.

The four future annexations/developments of Golf Lane, Golf Club Rd, Shaff Rd, and Park Lane would provide a **minimum** of 1,242 dwellings, creating an immediate surplus to the 20 year plan that our local economy simply cannot justify or has had time to extract the requirements needed by the housing analysis to implement a successful future infrastructure. For example, Park Lane and Shaff rd annexations could take care of the requirements for the 598 household units required under the Annual Median Income of 75K. Thus allowing for low density housing to occur at other developments to include the 116 acres already within Stayton that is not developed.

Stayton has only added 200 jobs since 2012 for a total of 3,350 jobs. Occupying those jobs, 2,520 people live outside of Stayton and commute here to work. Of Stayton's total labor force of 3823 people only 630 live and work here. That works out to every 4 people in 5 that live in our neighborhoods commute somewhere else to work.

We must confront the reality that Stayton is not providing the middle-income business growth necessary to support this level of residential expansion. Because we are failing to attract new residents through new business, this housing growth will simply trigger a

"Housing Shuffle," where our current neighbors move from their established homes into newer subdivisions, leaving our original neighborhoods to decay.

The core issue, however, is serviceability. A service is not adequate if its provision bankrupts the provider. Stayton currently faces a \$44 million infrastructure deficit not accounted for in the budget, including a \$26 million stormwater backlog identified in the 2009 Master Plan. The Mill Creek Basin is a critical "halt point" because it is already severely over capacity. FEMA studies show that a 100-year flood event puts 10,200 cubic feet per second (cfs) into the basin, but the Golf Club Road bridge allows only 1,360 cfs to escape—meaning only 13% of incoming flow can exit .

In 2019, the Stayton Area channel at Section FJ was remodeled from 4,000 cfs to carry only 3,355 cfs, a capacity decrease of 645 cfs . Because FJ can only hold about one-third of the potential intake the breaking point for failure at FJ is reached during almost every significant rain as intake quickly exceeds transport capacity.

Flooding has occurred once or twice every year since the 2002 Whitney Road and Village Creek developments originally overtaxed the channel. While developers are now forced to build large on-site detention ponds to meet "zero-impact" rules, these basins create a secondary crisis: permanent standing water that leads to mosquito infestations, turning a public health nuisance into a permanent fixture of our neighborhoods.

In short, the City's stormwater system fails the public serviceability standard on multiple fronts.

Regarding school sustainability, these developments will add 295 students to the North Santiam School District. Because it costs \$11,634 annually to educate one student but new property taxes only generate \$2,500, a permanent annual deficit exceeding \$2.3 million is created . With secondary schools already near capacity, reaching the 2,600-student "cliff" will mandate a bond for a new elementary school our residents simply cannot afford.

In conclusion, these projected annexations have not been scrutinized closely enough to ensure that our housing growth is phased or distributed responsibly. We are currently looking at 116 current undeveloped acres and looking to increase future annexations

that by far exceeds our state-mandated 20-year need. At the same time, our public serviceability—particularly within the Mill Creek Basin—is simply not in a condition to absorb this additional demand. We are already facing a \$26 million stormwater backlog, and it is unreasonable to add more runoff to a basin that is already failing and lacks the funding for necessary regional fixes. When you factor in the long-term financial impacts on our core services and the nearly \$2.4 million annual funding gap created for our school district, these annexations represent massive new obligations that will inevitably be paid for through future taxation. Because these applications fail to meet the required standards for both community need and public serviceability, they must be denied.

We must finish the "to-do" list from our 2019 Economic Plan and fix our failing pipes, our roundabouts and bring in new businesses before we ask taxpayers to subsidize another subdivision. For the sake of Stayton's fiscal future, I urge you to deny the annexations for Golf Lane, Golf Club Road, Shaff Road, and Park Lane.

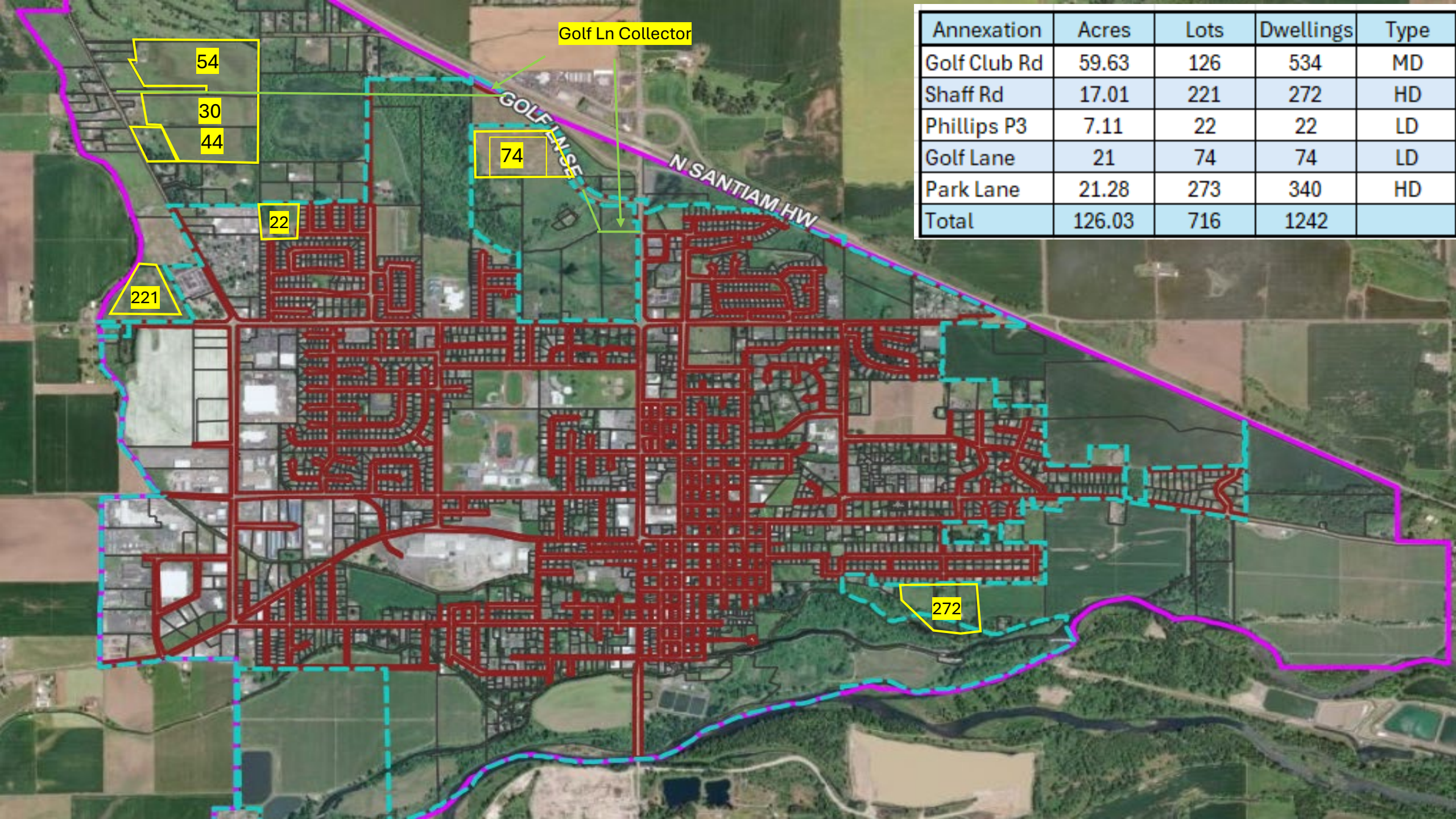
Notes: 271 units for 28,000 below, 204 units for 28K to 56K, 113 units for 56K to 74K, 171 units for 74K to 111K and 300 units for over 111K. 40% of the need 475 is for households making less than 56,000 a year or a monthly rent including utilities to stay below \$1389 to be considered affordable. Currently, the typical home price in Stayton is approximately \$455,612. Actual median of \$87,375. A significant portion of Stayton's 0–30% AMI population consists of seniors (the average age for this bracket in Stayton is 63).

106 acre 2013, 60 acres annexed for 166 acres minus 49.14 acres developed leaving 116.86 acres

- **Phillips Estates, Phase 2 (2014):** Approximately **5.3 acres**. (Estimated based on 21 single-family units in the LD zone) .
- **Phillips Estates, Phase 3 (2025/26 Concept):** **7.11 acres**. (Confirmed by the Supplemental Written Statement for File #11-07/24) .
- **Wildlife Meadows (2017):** Approximately **14.3 acres**. (Based on 42 units and the dedication of over 3 acres of green space) .
- **Hayden (Lambert Place) (2020):** **12.23 acres**. (Confirmed by the Lambert Property Annexation findings for 51 single-family homes).
- **Fern Ridge Apartments (2022):** **3.7 acres**. (Confirmed by the OHCS development report for the 72-unit project) .
- **East Santiam Duplexes (2023):** **1.5 acres**. (Estimated based on 18 duplex units in the Medium Density zone) .
- **Shaff Square Apartments (2023):** **5.0 acres**. (Confirmed by the Planning Commission findings identifying a 20-unit per acre density for the 100-unit project) .

Annexation Requirements

- A: **Need**, The city is low on Buildable Lands.
- B: **Contiguity**, The land touches city limits (no islands), Consistent with Cities Comprehensive Plan.
- C: **Serviceable**, Water, Sewer, Stormwater and runoff, Transportation, Financial impact (SDCs and taxes will cover the cost of the new infrastructure)
- D: **Safety**, Public Health/Traffic
- E: **Natural Hazards**.



Golf Ln Collector

GOLF LN SE

N SANTIAM HW

Annexation	Acres	Lots	Dwellings	Type
Golf Club Rd	59.63	126	534	MD
Shaff Rd	17.01	221	272	HD
Phillips P3	7.11	22	22	LD
Golf Lane	21	74	74	LD
Park Lane	21.28	273	340	HD
Total	126.03	716	1242	

54

30

44

74

22

221

272

Table 2 — Housing Inventory Alignment

Year	Plan-Assumed Housing Units	Actual / Estimated Population	Population-Based Housing Need (Population ÷ 2.7)	Actual / Estimated Housing Units	Surplus / (Deficit) vs. Population Need	Remarks
~2010 (Plan baseline)	3,056	~8,244	~3,053	~3,060	+7	Baseline alignment
2020	~3,700	Actual 8,244 Estimated 9,778	~3,053	~3,350	+297	Adequate supply relative to actual population
2024	~4,050	Actual 8,520 Estimated 10,900	~3,156	~3,425	+269	Housing growth ahead of population demand
2030 (Projected)	4,337	1.6% growth 9,376 Estimated 11,359	1.6% growth 3,472 Estimated ~4,207	TBD	TBD	Requires population growth not yet observed

Key Finding:

Housing inventory has increased despite slower population growth, resulting in higher units-per-capita, not a shortage condition.

Outdated projections show 1,281 unit needed by 2030. Actual Reality we only need 465 Units

Based on the "Economic Development Strategy" (2019) and updated Census/State employment data (2023–2024), the following chart illustrates the business and commuter trends in Stayton since 2010. Stayton Business & Commuter Trends (2010–2024)

Metric	2012–2015 (Baseline from Plan)	2023–2024 (Current Data)	Net Change
Total Employer Businesses	169 (2012 Est.)	171 (2022 Census)	+2 (Stagnant)
Total Jobs Located in Stayton	3,150 (2015)	~3,350 (Est. 2023)	+200 (Slow Growth)
Employed Residents (Labor Force)	3,176 (2013)	3,823 (2023)	+647 (Workforce Growing)
Commuter: Live & Work in Stayton	630 (19.8% of workforce)	~688 (18% of workforce)*	Flat / % Decline
Commuter: Live Here, Work OUT	2,870 (Out-Commuters)	3,135+ (Est.)	Increased Out-Flow
Commuter: Live Out, Work HERE	2,520 (In-Commuters)	2,662+ (Est.)	Increased In-Flow

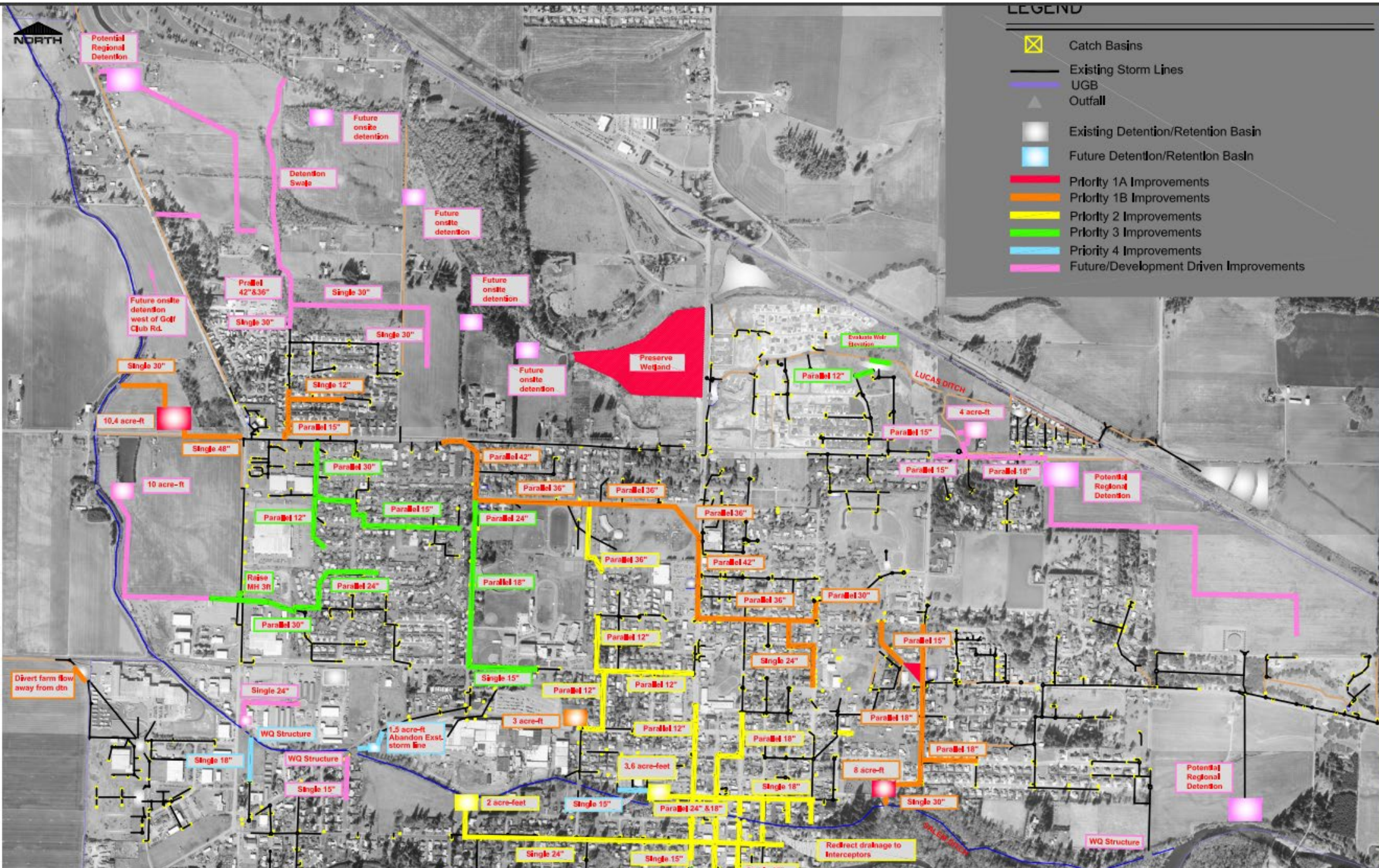
Estimated Costs to add Golf Ln/Golf Club Rd

Infrastructure Item	Details	Estimated Cost
Stormwater System Deficit	City-wide Backlog (2009 Master Plan)	\$26,000,000+
Golf Ln Water Main Extension	~1,500 ft of 12" main @ \$350/ft	\$525,000
Golf Ln Sewer Main Extension	~2,000 ft to connect @ \$400/ft	\$800,000
Mill Creek Booster Station	Required for Upper Pressure Zone	\$1,500,000 - \$2,500,000
Golf Lane Collector Road	Future TSP Project	\$8,200,000
Golf Lane Realignment	Safety requirement at Whitney St	\$3,320,000
Sewer Capacity Fixes	Gardner Station Removal (Required)	\$4,170,000
Golf Club Water Main Extension	~1,000 ft of 12" main @ \$350/ft	\$350,000
Golf Club Sewer Extension	~500 ft of 12" main @ \$400/ft	\$200,000
TOTAL "Backbone" Costs	Mill Creek Specific + Stormwater Backlog	~\$45,050,000+

Prioritization	Conceptual Level Opinion of Probable Cost*
Priority 1A Improvements	\$3.6M
Priority 1B Improvements	\$5.0M
Priority 2 Improvements	\$5.0M
Priority 3 Improvements	\$2.2M
Priority 4 Improvements	\$0.5M
Future Improvements**	\$9.7M
Rounded Total	\$26M

* All costs in 2007 Dollars and include engineering and contingencies.

** Timing depends on when growth occurs.



LEGEND

- Catch Basins
- Existing Storm Lines
- UGB
- Outfall
- Existing Detention/Retention Basin
- Future Detention/Retention Basin
- Priority 1A Improvements
- Priority 1B Improvements
- Priority 2 Improvements
- Priority 3 Improvements
- Priority 4 Improvements
- Future/Development Driven Improvements

KA:104037
FIG-12.dwg



Storm Water Master Plan
Stayton, OR

Prioritized Improvements

100 Year Flood Plan updated May 2006

FEMA's National Flood Hazard Layer (NFHL) Viewer with Web AppBuilder for ArcGIS

Find address or place

FF = Salem Ditch
 FH = Golf Club Bridge
 FP = Cascade Hwy Bridge
 FJ = Appr Design Runoff

Mill Creek Gauge / Location	2000 FIS Flow	2003 FIS Flow	2019 FIS Flow	Total Added CFS
Penitentiary Annex (100-Yr)	10,200 cfs	10,200 cfs	10,200 cfs	No Change
Stayton Area (Section FJ)	4,000 cfs	4,000 cfs	3,355 cfs	-645 cfs
Golf Club Road (Section FH)	1,360 cfs	1,360 cfs	1,360 cfs	No Change

41047C0708G eff. 1/19/2000

41047C0725G eff. 1/19/2000

LOMR 03-10-0442P eff. 5/11/2006

LIMIT OF STUDY

41047C0716G eff. 1/19/2000

41047C0725G eff. 1/19/2000

Lower Salem Ditch - Overview - Trend

Level (ft) 4.00 3.60 3.20 2.80 2.40 2.00 1.60 1.20 0.80 0.40 0.00

Flow (CFS) 150.0 135.0 120.0 105.0 90.0 75.0 60.0 45.0 30.0 15.0 0.0

01 Jul 2025 01 Jan 2026

Trace: Upstream Level, Flow

Ruler Value

Latest Value: 3/13/2026 12:41:21, 3/13/2026 12:41:22

0.2mi

-122.828, 44.823 Degrees

POWERED BY esri

USDA, USGS The National Map, Orthoimagery, Data refreshed June 2024

Table 6: Pre to Post summary table without flow control

Storm Event	Allowable Runoff (cfs)	North Area Undetained Flowrate (cfs)	South Area Undetained Flowrate (cfs)	TOTAL Undetained Flowrate (cfs)
2 year	0.75	4.72	7.8	12.52
5 year	1.03	5.72	9.45	15.17
10 year	1.03	6.82	11.24	18.06
25 year	2.55	8.15	13.38	21.53
50 year	3.77	9.55	15.61	25.16
100 year	4.03	9.83	16.06	25.89

Hydrograph Results

Below are the results of the hydrograph analysis for both pond facilities.

Table 9: Pre to Post Flowrate Summary with Detention/flow control

Storm Event	North Pond		South Pond		TOTAL Design Runoff (cfs)	Allowable Runoff (cfs)	Design < Allowable?
	Release Rate (cfsf)	Water Surface Elevation	Release Rate (cfs)	Water Surface Elevation			
2 year	0.22	417.32	0.47	416.17	0.70	0.75	YES
5 year	0.31	417.77	0.66	416.72	0.96	1.03	YES
10 year	0.37	418.23	0.82	417.21	1.53	1.54	YES
25 year	0.58	418.67	0.95	417.72	1.54	1.54	YES
50 year	0.96	418.95	1.85	417.96	2.77	3.77	YES
100 year	1.03	418.98	1.99	417.99	2.97	4.03	YES

Detailed Tax Revenue Breakdown

Development	Type	Dwellings	Est. Market Value	Taxable Value (AV)*	City Tax / Yr (Per Dwelling)**	Total City Revenue / Yr
Golf Club Rd	MD	534	\$533,000	~\$255,840	\$995	**\$531,330**
Shaff Rd	HD	272	\$300,000	~\$123,000	\$478	**\$130,016**
Phillips P3	LD	22	\$533,000	~\$255,840	\$995	**\$21,890**
Golf Lane	LD	74	\$533,000	~\$255,840	\$995	**\$73,630**
Park Lane	HD	340	\$300,000	~\$123,000	\$478	**\$162,520**
TOTALS	--	1,242	--	--	--	\$919,386 / yr

**Note: Taxable Assessed Value is calculated using Marion County's Changed Property Ratio (CPR) of ~0.48 for Residential and ~0.41 for Multi-Family. You do not pay taxes on full market value.*

***Note: City Tax is based on the Permanent Rate (\$3.328) + Library Levy (\$0.56) = \$3.888 per \$1,000 AV. This excludes schools/county taxes which do not go to the City budget.*

The "Unfunded Student" Gap

Based on standard student generation rates (0.45 for homes / 0.22 for apartments), these 1,242 units will add approximately **295 new students** to the district. Current Students 2,200 plus 295 is **2,495**. Cap for a mandatory new elementary school is 2,600.

School Level	New Students	Est. Classrooms Needed (25:1)
Elementary (K-5)	~140	5-6 New Classrooms
Middle (6-8)	~70	3 New Classrooms
High School (9-12)	~85	3-4 New Classrooms
TOTAL	295 Students	11-12 New Classrooms

Financial Deficit Annual

Cost to Educate: Approximately \$11,634 per student (State/District Avg) Total Annual Cost: \$3,432,030

School Tax Revenue Generated: Approximately \$1,064,000 (Est. @\$4.50/\$1k AV)
Annual Deficit **negative \$2,368,030**

QUESTIONS