



## COMMUNITY DEVELOPMENT DEPARTMENT

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June 30, 2020

Tammy Wisco  
Retia Consulting  
twisco@retiaconsult.com

***Sent via email***

Re: Files no. CP 20-03, ZM 20-02 – Incomplete Application

Dear Tammy,

On June 2, 2020 the City of Sisters Community Development Department received the land use applications you submitted for a Comprehensive Plan Amendment and Zoning Map Amendment for property located at 201 N Pine Street.

The City has 30 days following application submittal to determine whether the application is complete for the purpose of reviewing and deciding on the specific request. The application has been deemed incomplete as the information below is missing. The following information is needed in order for the City to deem your application complete and conduct our review. Please provide updated materials that include the following:

***Traffic Analysis and Transportation Planning Rule (TPR) – OAR 660-012-0060***

See attached request for information from City Traffic Engineer.

***Chapter 4.7 – Land Use District and Text Amendments***

***4.6.300(B) Criteria for Quasi-Judicial Amendments***

3. *“...The applicant shall update the City of Sisters Master Plans for Water, Sewer, Parks and Transportation Systems subject to City Council approval, to reflect impacts of the rezoning on those facilities and long-range plans...”*

**Staff Comment:** The application proposes an estimated 324.5 equivalent dwelling units (EDUs). The Parks Master Plan provides guidance of a level of service standard equating to 5.0 acres of developed parkland per 1,000 residents. As the applicant is adding a significant number of residential units, staff requests the applicant review this item to determine if there is a need for dedicated public park space to meet this level of service.

***Comprehensive Plan Chapter 5 – Open Space, Scenic and Historic Areas, Natural Resources,  
Policy 5.4 (3) The City shall identify and protect natural, riparian, and scenic resources within the UGB.  
Task m. Retain “Design Option D’ by establishing a goal of acquiring and developing between 5 and 47  
acres of the US Forest Service property located between Pine Street and US 20 for future***



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*community or regional park. This is in addition to retaining OTAK Design Options A, B, and C as development goals for the same United States Forest Service property.*

**Staff Comment:** The applicant did not provide a response to this item in the burden of proof. Staff requests the applicant address this policy item.

The application shall be deemed complete upon the receipt of all missing information. The applicant shall have the option of withdrawing the application, or refusing to submit information requested above. For the refusal to be valid, the refusal shall be made in writing and received by staff. If the applicant refuses in writing to submit the missing information, the application shall be deemed complete.

Please feel free to call or email me if you need any clarification or have questions.

Once we have received these missing items, we will be able to deem the application complete.

Please feel free to call or email me if you need any clarification or have questions.

Sincerely,

Nicole Mardell  
Principal Planner

cc: file



Date:	June 30, 2020
To:	Todd Mobley, Lancaster Mobley Engineering
Cc:	Paul Bertagna and Nicole Mardell, City of Sisters Erik Huffman, PE, City Engineer
From:	Joe Bessman, PE
Project Reference No.:	1237
Project Name:	Sisters Woodlands TPR Review

This memorandum provides formal review comments on the May 22, 2020 report submitted by Lancaster Mobley Engineering for the Sisters Woodlands Transportation Planning Rule analysis. The proposed application seeks to rezone the northern Forest Service parcel (201 N Pine Street) from Public Facilities, Urban Area Reserve, and Open Space to a combination of North Sisters Business Park, Downtown Commercial, Multifamily Residential, and Open Space. The application does not include a concurrent site plan and so assesses a reasonable “worst case” trip generation scenario, noting that future development plans are likely to be less intense.

The applicable criteria within a zone change analysis is the Transportation Planning Rule (Oregon Administrative Rule 660-12), and specifically section -0060 addressing *Plan and Land Use Regulation Amendments*. Effectively, the Transportation Planning Rule establishes the requirements for agencies to coordinate transportation and land use, develop a safe and efficient multi-modal system, and identify funding mechanisms to ensure that the necessary infrastructure can be provided as required. For a rezone effort the applicant must demonstrate whether the changes to the land use assumptions modify the system needs (create a “significant impact”), and if so, identify appropriate mitigation measures or changes to bring it back into compliance with State requirements. As such, the transportation analysis for a rezone is premised on the assumptions in the adopted Transportation System Plan.

When the 2010 Transportation System Plan was developed by DKS the Forest Service was in the process of reviewing various redevelopment scenarios for their property. As cited on page 112 of the City’s adopted Comprehensive Plan:

*“The USFS owns several properties in Sisters, including a 42.58 acre property designated and zoned Public Facilities, which is commonly referred to as the ‘South Barclay Parcel’...”*

The Comprehensive Plan states that in 2010 through a Transportation Growth Management project the City, USFS, DLCD, and ODOT coordinated efforts to review density thresholds and land use types that would not trigger the Transportation Planning Rule. Four separate development scenarios were reviewed with varying mixes of retail, residential, and industrial uses, though it does not appear that a single scenario was adopted.

The 2010 Transportation System Plan was developed and accounts for these properties. The travel demand model prepared as part of this effort assumed that the “South Barclay Parcel” would include 60 retail employees, 25 service employees, and 5 “other” employees. This assumed scenario was projected to generate 312 weekday p.m. peak hour trips. However, while referred to as the “South Barclay Parcel”

this reflects trips from the 42.6 acres that includes the 32.40-acre subject property and the southern 11.22-acre USFS parcel<sup>1</sup>, which is planned to retain its current USFS uses (see Figure 1). No changes to this forecasting was provided in the 2018 Transportation System Plan Update, so these land use assumptions remain valid.

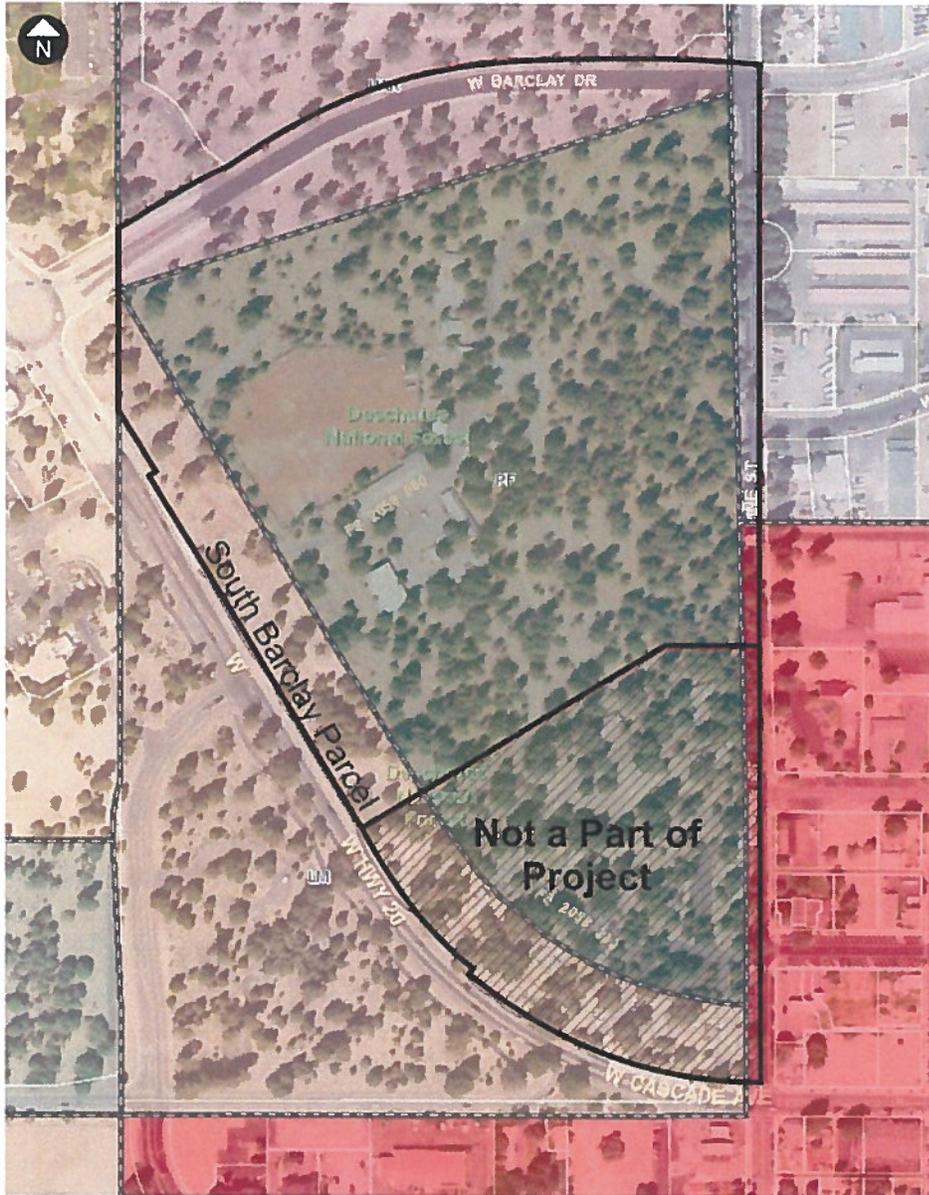


Figure 1. “South Barclay Parcel” and Comprehensive Plan designations – note that the hatched parcel is not included in the rezone and should be omitted from previously assigned trips.

<sup>1</sup> Acreages cited are as reported within DIAL (<https://dial.deschutes.org/>)

Accordingly, the analysis should be revised to proportionately consider the individual acreage of developable PF lands within each parcel (or alternatively the developable areas of each). Figure 1 illustrates the two parcels and the current Comprehensive Plan boundaries. As shown, a direct comparison of acreage would include the non-buildable right-of-way along Barclay Road and Pine Street. Considering only the PF zoned lands the subject property is approximately 78% of the "South Barclay Parcel" and so would only have been assigned 243 of the 312 weekday p.m. peak hour trips. This would then increase the impact of the rezone from the +44 weekday p.m. peak hour trips that were assessed to instead review +113 weekday p.m. peak hour trips.

Please let me know if you have any questions on this completeness review. I can be reached at (503) 997-4473 or via email at [joe@transightconsulting.com](mailto:joe@transightconsulting.com).