

Volume No. 3



Phoenix-Talent Schools
Excellence For Everyone

**City of Talent
Urban Growth Boundary
Amendment Application**

Boundary Location Analysis

**Phoenix-Talent
School District**

April 22, 2021



CSA Planning, Ltd
CSAplanning.net
4497 Brownridge, Ste 101
Medford, OR 97504-9173

Table of Contents

1	Introduction.....	2
1.1	Purpose of Talent UGB Evaluation	2
1.2	OAR 660 Division 24 Organization	2
1.2.1	Analysis Range Choices	3
1.3	Scope of Analysis	3
1.4	GIS Analysis Methodology	4
1.4.1	General Approach and Data Sources	4
1.4.2	Physical Features Data	4
1.5	Public Facilities Data	4
1.5.1	Improvement and Use Inventory	5
1.5.2	Land Use Planning Data	5
2	Land Need Analysis.....	5
2.1	Land Need and Quantity	5
2.2	Inventory of Lands within the UGB to Accommodate Need.....	6
3	Preliminary Study Area Mapping	6
4	First Priority Lands Evaluation for UGB Inclusion	8
4.1	First Priority Goal 14 Evaluation Group Ranking Analysis	8
4.1.1	Identification of First Priority Evaluation Groups	8
4.1.2	Goal 14 Boundary Location Ranking Methodology.....	9
4.2	Discussion and analysis of Goal 14 factors by each evaluation group	12
4.2.1	Evaluation Group A	12
4.2.2	Evaluation Group B	13
4.2.3	Evaluation Group C	14
4.2.4	Evaluation Group D	15
4.2.5	Evaluation Group E	16
4.2.6	Evaluation Group F.....	16
4.2.7	Evaluation Group G	17
4.2.8	Evaluation Group H	18
4.2.9	Evaluation Group I.....	19
4.2.10	Evaluation Group J	20
4.2.11	Evaluation Group K	21
4.2.12	Evaluation Group L	22
4.2.13	Evaluation Group M	23
4.2.14	Evaluation Group N.....	24
4.2.15	Evaluation Group O	25
4.2.16	Evaluation Group Q	26
4.2.17	Goal 14 Factor 2 Ranking of First Priority Evaluation Groups	27
4.2.18	Goal 14 Factor 3 Ranking of First Priority Evaluation Groups	28
4.2.19	Goal 14 Factor 4 Ranking of First Priority Evaluation Groups	28
4.2.20	Results of Goal 14 Factors 2 through 4 for Evaluation Groups.....	29
4.2.21	Goal 14 Factor 1 Analysis.....	30
4.3	Application of Comprehensive Plan Regulations	33
4.4	First Priority Lands Results	34
5	Priority 2 Marginal Lands Review.....	34
6	Priority 3 Marginal Lands Review.....	34
7	Priority 4 Resource Lands Review	35
8	Alternative Sites Results.....	35

1 INTRODUCTION

1.1 Purpose of Talent UGB Evaluation

Cities over 2,500 population, such as Talent, are charged with maintaining a sufficient supply of buildable land within its Urban Growth Boundary to meet demand for residential, employment and other urban land needs. Among those other needs is public facilities, including school facilities. Talent was a participant in the Regional Problem Solving Process that created the present day Urban Reserves. These Reserves were set aside to provide for future specific land needs of the City of Talent. This Volume 3 Analysis is being undertaken in support of one such need, specifically the need for lands for a Large School District school facility.

UGB evaluations can be performed by applying one of two administrative rules – OAR 660 Division 24 and OAR 660 Division 38. The analysis in this Volume 3 employs the methods set out in the OAR 660 Division 24 rule.

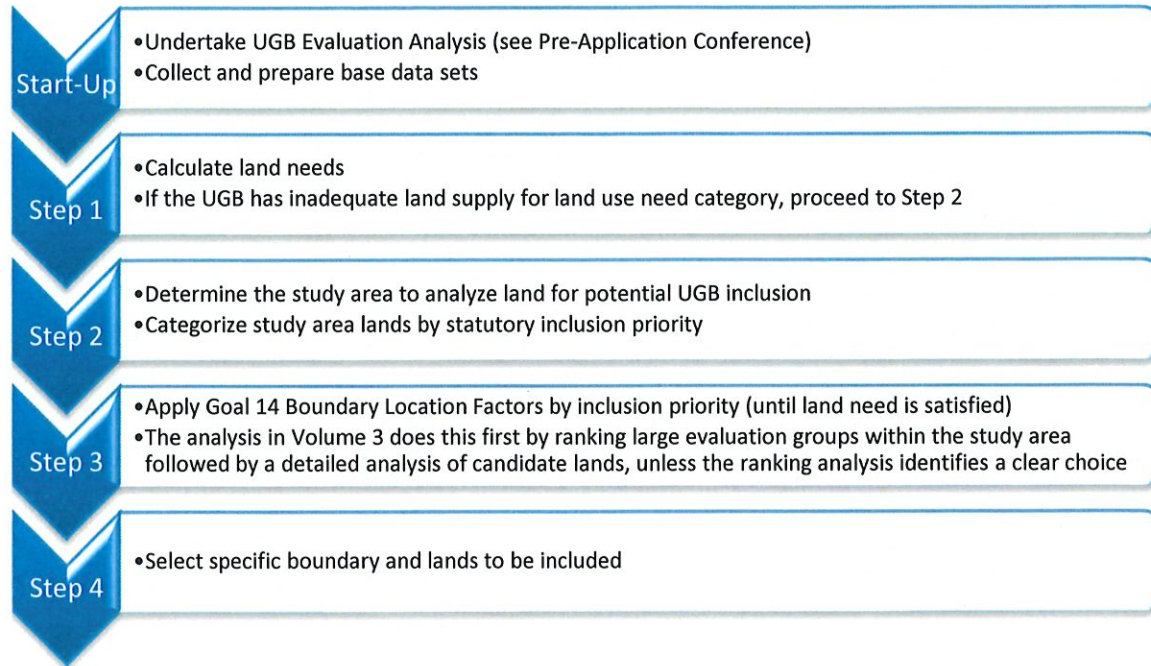
1.2 OAR 660 Division 24 Organization

Division 24 can generally be understood as split into four steps. The first step is a determination of land needs. If it is determined there is need for a land need for a specific use over the twenty-year planning horizon, such as a school facility in the case of this amendment, the lands within the UGB must be first examined for suitability of accommodating the need.

If it is determined that there is insufficient land to accommodate urban land needs for projected population growth over a twenty year period, the second step is to identify an adequate study area outside the UGB to evaluate potentially suitable lands for inclusion in the UGB using the methodology in the rule. The third step is to apply the Goal 14 Boundary location factors to lands in the study area to determine potential boundary amendment configurations. The final step is to select the lands most appropriate for inclusion in the UGB.

The below Flow Chart illustrates the Division 24 UGB evaluation process:





1.2.1 Analysis Range Choices

The structure of Division 24 has a few distinct points at which a choice must be made regarding the scope of lands incorporated within the study. Where such options have been provided by the Rule, this analysis has erred on the side of being conservative, choosing not to exclude lands where they could conceivably be excluded. Where such choices are made, they are explained within this text.

1.3 Scope of Analysis

Volume 3 includes the two fundamental components of the UGB amendment process – the Land Need Analysis (Start-Up and Step 1 in the above flow chart) and the Boundary Location Analysis (Steps 2 through 4 in the above flow chart).

Land needs are determined first, and must be based on the appropriate 20 year population forecast. The forecast for the subject amendment was done in the District’s Long Range Facilities Master Plan. After determining needs, Division 24 requires an inventory of lands inside the UGB to determine if there is adequate development capacity to accommodate the established needs.

If there is still a need after the inventory of lands within the UGB, the next step of the Division 24 rule involves the application of the Goal 14 Boundary Location Factors and the Priority Lands Statute. This Volume 3 analysis includes the alternative lands analysis elements required by Division 24.

1.4 GIS Analysis Methodology

1.4.1 General Approach and Data Sources

ArcGIS 10 is a Geographic Information System (GIS) and was chosen as the primary mechanism for compiling the inventory and performing the required buildable land inventory and boundary location analysis. GIS is a strong spatial analysis tool that supports rigorous database development and analysis. This analysis utilized GIS and land use planning professional best practices in all analytic procedures.

Site requirements for the specific school use identified by this amendment includes both qualitative and quantitative dimensions, and therefore the analysis necessarily has subjective components. To obtain quality results that would be expected to be reasonably repeatable, the analysis in this Volume 3 includes methodology explanations throughout so that the technical reader can follow and understand the analytic approaches at each step.

1.4.2 Physical Features Data

Topography throughout the study area may be described as gently sloped to flat with a steep hill to the south and southeast which overlaps some of the lands evaluated in this analysis. Bear Creek runs southeast to northwest through the study area and separates the City of Talent from I-5 to the east. The majority of the study area is located to the west of Bear Creek. Other tributaries flow into Bear Creek in and around the study area, including Wagner Creek to the south, Anderson Creek to the west, and several irrigation canals in the Talent Irrigation District system.

Candidate lands with significant portions of their property covered by 100-year floodplain and / or wetlands were identified. The entire study area was also examined for all reasonably available data indicating presence of fault and landslide activity. There are no known faults or landslides inventoried for the study area. Volume 2 Atlas Pages 4 depict the identified environmental constraints in the study area.

1.5 Public Facilities Data

Public facilities include roads, storm drain, sewer, water and power. A comprehensive inventory of all known public facilities for the entire study area are illustrated and categorized throughout the accompanying Volume 2 Atlas. An integral component used for evaluating candidate lands for consistency with Goal 14 boundary location requirements includes an assessment of public facilities and services. Goal 14 requires an orderly and economic provision of public facilities and services when establishing or amending an Urban Growth Boundary.

Jackson County and Rogue Valley Sewer Services (RVSS) provided GIS data used to create the map on Atlas Page 5. The maps depict locations of key public facilities, such as roads and sewer. Most of the lands outside the UGB are not presently served by water, sewer and storm drain facilities. RVSS does have a few sewer lines outside the UGB that serve several properties adjacent to the City of Talent, including the property that is the subject of this application. Atlas Page 5 also identifies the existing transportation network.

S Pacific Hwy runs through the center of Talent and the study area, connecting the City to the regional network and beyond.



1.5.1 Improvement and Use Inventory

For all portions of this study that rely upon GIS data, lot sizes were derived using GIS area calculation tools. Improvements were inventoried using GIS building footprints reconciled with Jackson County Assessment improvement records. Market values, assessed values, improvement values, land values, and descriptions of improvements were taken from Jackson County Assessment records.

The analysis also used building footprints or polygons and Jackson County Assessor's improvement data to help determine development status of properties. Additionally, lands were examined on a lot-by-lot basis using aerial photographs to determine actual land area dedicated to buildings, accessory improvements (such as parking lots and driveways), wetlands, floodplain, floodway, and steep slopes.

1.5.2 Land Use Planning Data

The land use planning data used in the analysis is based upon GIS layers obtained from the City of Talent and the Jackson County. These layers consist of data such as Comprehensive Plan Map designations, Zoning Map designations and overlays. Overlays are special area regulations such as floodplains, riparian areas, and wildlife habitats. CSA attempted to utilize the latest digital versions of all land use planning data and elements for the analysis.

2 LAND NEED ANALYSIS

This portion of the analysis is split into two parts. The first part determines if there is a need for a Large School District Facility related use and the quantity of lands needed to satisfy such a use if it is established. The second part is an examination of lands within the existing UGB. This portion of the analysis will identify individual sites and determine if they could accommodate the land needs calculated in the first part.

2.1 Land Need and Quantity

To establish a specific land need, this analysis relies upon the District's Long Range Facilities Master Plan in concluding that there is a demonstrated need to accommodate a Large School District land need for an urban population consistent with a 20-year population forecast. The Facilities Master Plan describes the real property and infrastructure needs of the District over the next 10-20 years using a population forecast that takes into account projections from Portland State's Population Research Center, the Jackson County Comprehensive Plan, and the Oregon Office of Economic Analysis.

With respect to the *amount of land needed*, the County and City incorporate and rely upon the Long Range Facilities Master Plan and the Phoenix-Talent School Board's Resolution 17-8. As determined in the Findings of Fact of Volume 1, most of the subject property is already developed with school uses. The Master Plan determined these existing uses as necessary for the functioning of the School District and further demonstrates a need to find a new site for the Outdoor Discovery Program. After completing the Master Plan, the easterly 12 acres of the subject property were determined to be surplus by the School Board in Resolution 17-8, which leaves the remaining 31 acres as necessary to the long-term operation of the District.

Therefore, to accommodate the identified school need, suitable lands should be approximately 31 acres in size.



2.2 Inventory of Lands within the UGB to Accommodate Need

Having established the need in the preceding section, a local government must inventory land inside the UGB to determine whether there is adequate development capacity to accommodate the identified needs.

For residential and employment lands Division 24 has additional requirements when inventorying land, but no specified process when it comes to a public facility, such as a school. As such, this analysis must determine how the inventory is conducted and which lands may be considered suitable.

Because the established need is approximately 30 acres, inventorying lands within the UGB that are substantially less than this size is not necessary, as they could not reasonably accommodate the need. In addition, lands that have substantial levels of existing improvement value are unlikely to be amenable to sale and redevelopment. Thus, the inventory will consist of those lands within the UGB all parcels within the UGB that are greater than 5 acres in size and have less than \$100,000 in improvement value¹. In order to identify these lands, GIS was used to select those properties meeting the criteria from Jackson County Tax Lot records.

Atlas Page 6 shows the resulting lands. It also shows the location of the Subject Property and the other educational facilities owned by the District. As shown on Atlas Page 6, the largest parcel with no development within the UGB is approximately 28 acres in size. 9 of the 12 undeveloped parcels greater than 5 acres in size within the UGB are part of the Bear Creek Greenway or developed parks.

Of the remaining 3 parcels, only one (Map and Taxlot 38-1W-36-1001) is close to the developed size at approximately 26 ½ acres. This property is the furthest from existing school facilities and would create significant transportation and organizational inefficiencies by being so far removed. It is also the subject of a current subdivision application and approximately half the site has at least a moderate slope that would make construction of large ballfields and similar required uses expensive to construct.

The analysis shows there are no appropriate sites within the existing UGB that could be cost-effective and logical for the District to use. Accordingly, there is not adequate development capacity within the UGB to accommodate the Large School District facility need which is the subject of this application.

3 PRELIMINARY STUDY AREA MAPPING

The methodology for determining the preliminary study area is narratively described in Division 24 in section 660-024-0065. The methodology is somewhat prescriptive but does require geospatial analysis and some application of discretion. In subsection (1) of the rule, the following categories are required for inclusion in the preliminary study area:

- a) All lands in the city's acknowledged urban reserve, if any;

¹ This value was chosen, as an educated guess, to differentiate between developed and non-developed. A lesser value could be chosen, but it would not substantively alter the outcome.



City of Talent Urban Growth Boundary Amendment

Applicant: Phoenix-Talent School District

- b) All lands within ½ mile of the acknowledged UGB²
- c) All exception³ areas contiguous to an exception area that includes land within the distance specified in subsection (b) and that are within one mile⁴
- d) Other lands at the discretion of the City that exceed the distances in (b) or (c) above.

Using a GIS application, CSA applied the foregoing criteria to create an initial map of Study Areas to meet the requirements of subsection (1), see Atlas Pages 7 and 8.

The following subsection of the rule, subsection (2), does not apply to the subject application as it only concerns UGB amendments initiated prior to January 1, 2016.

The next subsection of the rule, subsection (3) allows a City to reduce the study area if the primary purpose of the UGB amendment is to accommodate a particular industrial use or public facility that requires specific site characteristics. Schools are one of the listed uses public facility that can be used to justify a more targeted study area. For this reason, the proposed amendment could use this subsection to reduce the study area.

The Large School District facility land needs identified in the Application are not the types of facilities and uses with objective physiographic siting criteria (like for example a UGB amendment for a new municipal water intake and treatment facility which would need to be located at (or very near) the raw water point of diversion in the water rights permit). For the subject Large School District facility needs, the study area reduction could likely be justified but it is necessarily more subjective for this reason. Because the subject application is a quasi-judicial UGB amendment for less than 50 acres being prepared and submitted by the School District, it is difficult for the Applicant to make an “educated guess” at where and how both the City of Talent and Jackson County might agree on how to reduce the study area *a priori*⁵. Thus, the District’s application has taken a conservative approach by not reducing the study area. As part of the review process, if the City and County are in agreement on a study area reduction under OAR 660-024-0065(3), then Applicant agrees to update Volume 3 in accordance with the study area reduction agreed upon by the City of Talent and Jackson County to be incorporated into the UGB adoption ordinances for the jurisdictions.

Likewise, subsection (4) of the rule allows for further exclusion of lands from the preliminary study area if they meet certain criteria. However, this is an optional step and entirely discretionary. As with subsection (3), Applicant declines to disqualify any further lands from the initial study map. The same qualities that may disqualify lands relate directly to the Goal 14 boundary analysis

² Applies to cities with a population under 10,000, such as Talent. For cities with a population equal or greater to 10,000, the distance is one mile.

³ It is assumed that any rural residential areas or non-resource lands are categorized as “exception” lands for the purposes of establishing the preliminary study area

⁴ Applies to cities with a population under 10,000, such as Talent. For cities with a population equal or greater to 10,000, the distance is one and half miles.

⁵ The District intended to coordinate with Jackson County and the City of Talent to determine if agreement on *a priori* site requirements for the identified Large School District facility land need could be reached and incorporated into the adopting ordinances for the Phoenix-Talent School District Long-Range Facility Master Plan. Adoption of that plan is required by ORS 195.110. The Phoenix-Talent School District Long-Range Facility Master Plan draft adopted by the School District was transmitted to the City of Talent and Jackson County for planning coordination and adoption in June 2018 and remains pending; neither jurisdiction has ever scheduled a hearing.



requirements and as such are analyzed therein under Section 4 of this document. For example, the orderly and economic provision of facilities and services is one of the four factors requiring analysis under Goal 14.

After declining to disqualify any lands, the initial Study Area consists of many hundreds of acres of land. The next subsection of the rule, subsection (5), requires adjusting the lands included in the study area if it is not twice the amount of land required to satisfy the land needs calculated according to OAR 660-024-0040 Land Need. The land need, as calculated herein Section 2.1 and herewith incorporated into this analysis, is deemed to be ~31 acres. Thus, no adjustment is required under subsection (5).

According to subsection (6) of the rule, the lands left after disqualifying areas under subsection (3) and (4) and further adjusted to account for minimum acreage under subsection (5) are considered the study area for further analysis under subsequent sections of Division 24. Because no adjustments were made, the initial study area remains identical to those lands identified after step (2). These lands are found on Atlas Pages 7 and 8.

The remaining subsection of 660-024-0065 provides clarification as to what lands may be disqualified under the foregoing subsection (4), and are thus not implicated in this analysis.

4 FIRST PRIORITY LANDS EVALUATION FOR UGB INCLUSION

ORS 197A.320(2)(c)(A) designates as first priority for inclusion in the UGB land that is designated urban reserve land under the ORS 195.145 rule or metropolitan service district action plan or land that is subject to an acknowledged exception or land that is non-resource. The statutory priority schema is set out in Division 24 at OAR 660-024-0067(2)(a)⁶.

The City of Talent has established Urban Reserves, including TA-1, which is host to the subject property. As shown on Atlas Page 8, the Study area included urban reserves and exception lands, but no non-resource lands outside of the established urban reserves⁷. Other non-resource lands would have been included, but none fell within the established geographical areas of the analysis. The lands in the Study Area that fall under the first priority categorization are the lands evaluated for inclusion suitability in this Section and can be seen on Atlas Page 9.

4.1 First Priority Goal 14 Evaluation Group Ranking Analysis

4.1.1 Identification of First Priority Evaluation Groups

In order to appropriately evaluate the possible areas of UGB expansion, properties have been grouped together for analysis. The exception to this rule is established urban reserves, which are generally considered as individual units. Given that the total UGB land needs for the proposed

⁶ Where only a portion of a parcel is within an urban reserve but otherwise not identified as a first priority of land by Division 24, the portion of the parcel outside of the urban reserve boundary has not been identified as a first priority land.

⁷ A very limited quantity of non-resource lands do occur in the established urban reserve area TA-3.

amendment is approximately 30 acres, groups were constructed to be close to this size if feasible. Only one of the groups exceed 100 acres⁸, which is a limit set forth in Division 24 for lower priority lands, but was deemed an appropriate guideline for this analysis. The rationale for this size range is that the best expansion location alternatives could then be configured with a specific boundary location that is equal to the land need types for which the land area group is best situated. The Evaluation Groups can be found on Atlas Page 10.

4.1.2 Goal 14 Boundary Location Ranking Methodology

If more land of a priority is deemed suitable under the foregoing analysis than is needed to meet the established need, the Division 24 rule requires criteria in Section 660-024-0067(7) to be applied to these lands to determine which to include in the UGB. The suitable lands of the first priority are hundreds of acres and far exceeds the calculated need, which totals ~31 acres.

To determine which of these lands are appropriate for inclusion, the rule requires applying first the Boundary Location Factors (“Factors” henceforth) of Statewide Planning Goal 14 and then applying applicable criteria in the comprehensive plan and land use regulations acknowledged prior to initiation of the UGB evaluation or amendment. The Factors are not independent criteria and all factors must be balanced when conducting the analysis.

The Factors of Goal 14 are as follows:

- Factor 1: Efficient accommodation of identified land needs;
- Factor 2: Orderly and economic provision of public facilities and services;
- Factor 3: Comparative environmental, energy, economic and social consequences; and
- Factor 4: Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB.

The impacts to existing services with UGBs must be considered as well as the capacity of public facilities and the need for new transportation facilities. The public facilities in Factor 2 are prescribed by Section 660-024-0067(9) as “water, sanitary sewer, storm water management, and transportation facilities.”

To apply the Factors, each Evaluation Group was examined in turn for the four boundary location factors. This analysis used a mix of qualitative and quantitative judgements to evaluate how well each factor applied to a given group. Below are some of the Factor criteria on which the groups were evaluated:

- Factor 1: Acknowledged as part of the District’s Facilities Master Plan, owned by the District, level of parcelization, median lot size, median improvements value, distance from UGB, physical development barriers such as steep slopes, fit with existing development patterns and regional plan consistency.
- Factor 2: Each of the public services was evaluated independently for such factors as distance from existing infrastructure, any known issues providing service to a given area already in the UGB as noted in an adopted facility master plan, and local connectivity. It

⁸ The one group where this rule was not followed is an established Urban Reserve, TA-3.

is worth noting specifically that the City's 1999 Storm Water Master Plan `stated that most of Talent could develop without detention requirements. It is unclear how this relates to regulatory requirements today or what improvements have been made in the meantime.

- Factor 3:
 - Environment: Potential conflicts with Goal 5 resources, parks, wildfire hazards, open spaces
 - Energy: Distance from services that would require additional trips or VMT
 - Social: Qualitative assessment of impact on rural aesthetic and quality of life, congestion impacts, fit with existing uses
 - Economic: Ownership by District, impact on existing or potential commercial developments, fit with existing services
- Factor 4: Characterization of abutting resource uses and known potential conflicts, distance from resource farm and forestry uses

A rank order analysis for the UGB Evaluation Groups for UGB Factors 2, 3 and 4 is logical. For these three Factors, the comparison between evaluation groups is more akin to UGB evaluations wherein the considerations for specific uses and existing development patterns are less prominent. The rank order analysis for these three Factors functions to assure inclusion of the proposed UGB area is not overly reliant upon existing ownership, use and development patterns. After analyzing each Evaluation Group independently for these three factors, the groups were then compared against each other for relative values and assigned a ranked score. For example, if one group had the least farm impact, but it was still a slightly negative impact, it would be scored as 1, the best group out of the 23.

Factor 2 and Factor 3 are comprised of multiple subfactors. To assign a total Factor score, the subfactors were combined into a composite. For Factor 3, each subfactor (energy, environment, social, and energy) was weighted equally and the average taken. For Factor 2, stormwater was given a half weight before the average was taken. Stormwater is usually capable, if not outright required, to be managed onsite to pre-development flows and therefore does not have the same impact or connectivity requirements as water, sewer, or transportation. Moreover, the specific land needs for the proposed UGB amendment include a number of field-sport uses that do not produce the same quantities of impermeable surfaces as other types of urban development (like residential, commercial and industrial developments). On the other hand, being directly next to a sewer or water connection versus being ½ a mile from a such a connection is an important consideration from a Factor 2 perspective. Thus, stormwater is calculated with a diminished weight for the overall Factor 2 calculation.

A composite rank order score is calculated in the analysis for Factors 2, 3, and 4. Equal weight is given for each of the three factors. The analysis actually has two separate composite scores due to the Factor 4 being considered in two ways. One way is to consider the subject property evaluation group from a farm impacts standpoint without regard to the existing development and uses on the site and the other scoring method accounts for agricultural use compatibility in relation to the physical development and uses already located on the site.

The Factor 1 considerations are unique and the Factor 1 analysis is not at all similar to other types of urban development (like residential, commercial and industrial developments), as follows:

- The UGB amendment is for a specific set of land needs identified in the Large School District Facility Master Plan, including:
 - Outdoor field-sports facilities
 - Planned site for the Outdoor Discovery Program (an unresolved need in the master plan for which the site has been identified by the District if it is added to the UGB).
 - School bus yard and associated building.
 - Barns/facilities for animal storage for the agricultural education uses at the high school
- The land proposed for inclusion is already owned by the Phoenix-Talent School District and is substantially developed with many of the uses which are identified land needs, including:
 - Some of the needed Outdoor field-sports facilities
 - School bus yard and associated building
 - Barns/facilities for animal storage for the agricultural education uses at the high school
- Any site that could be functional to meet these land needs has to be large enough to accommodate all the identified needs, on essentially, a single site. It needs to be essentially flat because none of the identified uses are appropriately located on hillside terrain and it needs to be reasonably well-located in relation to other facilities of the School District so that it can be utilized in a organizationally efficient manner.
- The adopted and acknowledged Regional Plan that established Urban Reserves for the City of Talent specifically designated the subject property for the types of uses proposed, so consistency with the Regional Plan is a major Factor 1 consideration for the subject UGB amendment.

Accordingly, a simple rank order scoring methodology that would “average” the Factor 1 rank score with the other three factors would make little sense. Efficient accommodation of identified land need is already achieved by the existing development and land use on the proposed UGB inclusion land. Furthermore, this land use is contemplated by existing land use plans. As such, the analysis presented here uses the average rank scores of Factors 2, 3 and 4 as a reasonableness test for inclusion of the School District property when compared to other Evaluation Groups *e ceteris paribus*. The analysis then proceeds to analyze Factor 1 in depth when compared to any other Evaluation Groups that could, at least plausibly under Factors 2, 3 and 4, accommodate the identified land needs.

4.2 Discussion and analysis of Goal 14 factors by each evaluation group

4.2.1 Evaluation Group A

Comprised of 8 parcels totaling approximately 25 ½ acres. The group consists of Urban Reserve TA-4 and two other lots that border the Reserve. The property within the Urban Reserve is designated as Employment Land in the City's Regional Plan Comprehensive Plan Element. It primarily zoned as EFU with a couple of lots zoned as Rural Residential. The group hosts an existing transformer station for Pacific Power

4.2.1.1 Efficient Accommodation of Identified Land Needs

An established urban reserve located on flat ground that is immediately adjacent to the City. The Evaluation Group is somewhat parcelized, but the majority of the land is located in one ~17 acre parcel with no development. The remaining lots have diverse ownership and are around ~3 acres or less. The median lot is 5 acres in size and has \$300,000 in improvements. The total lands are not enough to satisfy the established need of ~31 acres. The group is adjacent to the existing school facilities located at Colver Field, offering some synergies with the existing facilities. None of the subject properties are within the District's Long Range Facilities Master Plan. The RPS plan has a condition limiting the properties east of the railroad to industrial uses, which is in direct conflict with the identified need of the subject amendment.

4.2.1.2 Orderly and Economic Provision of Facilities and Services

Good access to higher order roads and adjacent to a 12" sewer line. Limited connectivity with neighboring urban local streets. Abutting lots in the City that have water. The City's 1999 stormwater master plan indicated that a neighboring stormwater basin had more runoff than the system could handle as it was built. It is not clear how or if this has been addressed in the intervening 20-year period or if the Evaluation Group was implicated in the runoff.

4.2.1.3 Comparative ESEE Consequences

- Economy: Negative, as the property is not owned by the District. The land is designated as Employment Land in the City's Comprehensive Plan and RPS. Using the lands for a different use would negatively affect the supply of such land to the City.
- Environmental: Positive, as even though the group is in the Jackson County Wildfire Overlay, the area is not heavily forested and no parks will be impacted.
- Social: Positive, as the area has been designated as an Urban Reserve and abuts City limits, meaning comparatively less disruption to existing rural patterns. Direct access to a highway means less disruption to local traffic patterns.
- Energy: Positive, as the group is among the closest to jobs and services and has direct access to Highway 99.

4.2.1.4 Compatibility with Nearby Agricultural and Forest Resource Uses

In general the property is quite compatible with farm and forestry uses. Lands to the east and south are developed or designated for residential uses and as such pose no issues. The farm lands to the north consists of one large EFU parcel, but appear to be inactive. The parcel was once the site of



an active orchard, but the property does not appear to have been managed as a farm use for decades. Roots from orchard trees removed long ago continue to produce suckers, but the trees do not appear to be cared for. Lands to the west include one smaller farm, approximating 11 acres. The property appears to be used for a grass hay or grain use.

4.2.2 Evaluation Group B

Totalling approximately 43 acres, Evaluation Group B is comprised of only 1 lot, Tax Lot 1000. It is located immediately southwest of Evaluation Group A and is otherwise bounded by the City to the east, EFU lands to the west and south, and Colver Road to the north. The Group is zoned EFU and is developed substantially with school facilities. The facilities include soccer fields, baseball and softball fields, a bus barn, agricultural education buildings, and a maintenance shop. The property is designated as Talent's Urban Reserve TA-1 and is limited by the Regional Plan Element and RPS to school facilities.

4.2.2.1 Efficient Accommodation of Identified Land Needs

Very similar to its neighbor Group A, this Evaluation Group is located in an advantageous location adjacent to the City and has flat topography. It is already owned by the District which has the identified need that is the subject of this amendment. Facilities that are similar to those identified as needed by the District are already constructed on the property.

4.2.2.2 Orderly and Economic improvements Provision of Facilities and Services

The property borders Colver Road, which is a County collector. It has five entrances to the road. It also borders unimproved right of way to the east, which the City TSP identifies as the site of a future collector road. Potential connectivity to urban local streets is otherwise limited. Abutting lots to the east are within City limits and have water services. The property is already served with sewer service. The City's 1999 stormwater master plan indicated that a neighboring stormwater basin had periodic flooding problems. It is not clear how or if this has been addressed in the intervening 20-year period or if the Evaluation Group implicated in the flooding.

4.2.2.3 Comparative ESEE Consequences

- **Economy:** Positive, as the property is already owned by the District requiring less public expenditure.
- **Environmental:** Positive, as even though the group is in the Jackson County Wildfire Overlay, the area is not heavily forested and no historic resources will be impacted.
- **Social:** Positive, as the Group has already been substantially developed and abuts City limits, meaning comparatively less disruption to existing rural patterns. Access is somewhat less direct than Evaluation Groups located on S Pacific Highway, but additional traffic impacts are expected to be limited as the site is already significantly developed.
- **Energy:** Moderately positive, as the group is somewhat close to downtown services, even if it is not the among the closest.

4.2.2.4 Compatibility with Nearby Agricultural and Forest Resource Uses

Evaluation Group B abuts lands zoned for farm use on three sides, to the south, west, and north. To the south are mature orchards operated by Bear Creek Orchards and Meyer Orchards. To the west is a 11.65 acre parcel that has residential and associated farming improvements. Most of the property appears to be pastureland for cattle. Farm lands to the north are separated from the Group by Colver Road and for the most part are residential in nature, including a small subdivision. The orchard lands to the south are significantly buffered from existing uses on the property. All of these uses have coexisted with the school improvements for decades, indicating a high degree of compatibility.

4.2.3 Evaluation Group C

Evaluation Group C is made up of 7 lots. The area of these lots within an established urban reserve, Urban Reserve TA-ROW, totals approximately 18.5 acres. These lots have additional acreage outside of TA-ROW, but these lands consist of agricultural lands that do not meet first priority criteria. The Evaluation Group is located along the western edge of Talent City limits and comprises the totality of TA-ROW. This Urban Reserve was created with the express intention of building a new collector street to connect between Colver Road and Wagner Creek Road. It crosses 7 parcels, 5 of which are zoned EFU. Only two of the 6 parcels are entirely incorporated within the Urban Reserve Area, the rest have only portions that are crossed by TA-ROW.

4.2.3.1 Efficient Accommodation of Identified Land Needs

Immediately adjacent to City limits. As noted herein above, the Evaluation Group crosses portions of 7 different parcels. More importantly, the uses of this urban reserve are expressly limited to transportation uses by RPS and the City of Talent Comprehensive Plan, rendering this group unable to meet the established need of this proposed urban growth amendment.

4.2.3.2 Orderly and Economic Provision of Facilities and Services

Water and sewer services would generally be available, as the entirety of the reserve abuts City limits and residential areas with services. No comparative disadvantage to creation of stormwater facilities.

4.2.3.3 Comparative ESEE Consequences

- Economy: Somewhat negative, as the property is not owned by the District.
- Environmental: Somewhat positive, as even though the group is in the Jackson County Wildfire overlay, the area is not heavily forested and no historic resources will be impacted.
- Social: Neutral, as the area already features residential dwellings but is surrounded by primarily rural residential uses that would be less compatible with higher density dwellings or commercial uses. Access is less direct and there may be additional traffic on local streets.
- Energy: Positive, as the Evaluation Group slated for transportation uses and the TSP notes that it would provide a valuable connector and remove unnecessary traffic from local streets.

4.2.3.4 Compatibility with Nearby Agricultural and Forest Resource Uses

The Group crosses 5 lots that are zoned EFU. Developing this Group would remove substantial portions from existing farm properties that are actively farmed. For example, it would remove approximately 9 acres from a ~60 acre orchard parcel, half of a 5 acre small farm, ~2 acres from a ~7.5 acre orchard, and cross an important regional irrigation canal. Assuming nearby uses include the remainders of the existing farm parcels that are partially within the Evaluation Group, this Evaluation Group could have substantial impacts on existing farm practices and sustainably.

4.2.4 Evaluation Group D

Totaling approximately 29 acres, Evaluation Group D comprises 14 lots of lands that are zoned for Rural Residential uses. It is located immediately west of Evaluation Group C and is located along Foss Road, a minor rural collector, as it travels west from the City border.

4.2.4.1 Efficient Accommodation of Identified Land Needs

This Evaluation Group is located in an advantageous location, being practically adjacent to the City and has relatively flat topography. It is also quite close to existing school facilities owned by the District, with the Elementary and Middle schools located within 1,000 feet. However, the development pattern is already parcelized and nearly every lot has substantial residential improvements. The largest single lot is around 5 acres, with most between 2 to 3 acres.

4.2.4.2 Orderly and Economic improvements Provision of Facilities and Services

Immediate access on to a minor rural collector. Downtown services are not very distant, at less than a ½ a mile away. Potential connectivity to urban local streets is limited. Sewer and water services are quite close, as residences with City limits with services are within 300 feet of the Group's border. No comparative disadvantage to creation of stormwater facilities.

4.2.4.3 Comparative ESEE Consequences

- Economy: Somewhat negative, as the properties are not owned by the District.
- Environmental: Positive, as even though the group is in the Jackson County Wildfire Overlay, the area is not heavily forested and no historic resources will be impacted.
- Social: Moderately Positive, as the area already features residential dwellings and is very close to similar school facilities, meaning comparatively less disruption to existing rural patterns. Access is less direct than other Evaluation Groups, requiring travel through town and additional traffic near schools.
- Energy: Moderately positive, as the group is quite close to existing school facilities and would allow for potential synergies for maintenance, transportation, and educational uses.

4.2.4.4 Compatibility with Nearby Agricultural and Forest Resource Uses

Nearly every constituent parcel of Evaluation Group D is surrounded by EFU lands on at least a few sides, including intensively used orchard lands. Unlike other Evaluation Groups, constructing school facilities on lands currently used for residential purposes would likely mean an intensification of use next to farmland. The shape of the group is such that buffering would be more difficult than in a Group made up of larger, more regularly shaped parcels.



4.2.5 Evaluation Group E

Evaluation Group E is made up of 12 lots with a total area of ~35.5 acres. It is located along Beeson Lane, near the intersection of Beeson and Tarry Lane. All constituent lots are zoned for Rural Residential uses.

4.2.5.1 Efficient Accommodation of Identified Land Needs

The Evaluation Group is located substantially distant from the City and existing school facilities. Existing lots are parcelized and developed with substantial residential improvements. None of the properties are owned by the District. The Group in effect is a small residential neighborhood surrounded by farmland in all directions. The land is relatively flat.

4.2.5.2 Orderly and Economic Provision of Facilities and Services

Not immediately located on a collector or arterial. Highway 99 is located over 1.5 miles away, requiring substantial travel on local streets in order to access the Group. Water and sewer services would need to travel through substantial quantities of intervening farm lands. No feasible connection to urban local streets. Nearest property with City services is over ½ a mile distant. No comparative disadvantage to creation of stormwater facilities. More distant from services because of lack of direct connections to urban core.

4.2.5.3 Comparative ESEE Consequences

- Economy: Somewhat negative, as the property is not owned by the District.
- Environmental: Somewhat negative, as Anderson Creek, a Class I stream, runs across the western border of the property.
- Social: Negative, as the area already features residential dwellings but is surrounded by primarily rural residential uses that would be less compatible with a more intensive school use. Access is not direct to primary higher order streets and would likely create negative traffic impacts on rural roads.
- Energy: Negative, as the group is relatively quite distant to downtown services and residential areas housing District students.

4.2.5.4 Compatibility with Nearby Agricultural and Forest Resource Uses

Evaluation Group E is surrounded by farm uses on all sides. A school use on these lands would also represent an intensification and change of use, causing potentially more disruption to farmlands. Traffic would also likely be increased substantially should all necessary school facilities be built anew at this location, causing conflicts with farm equipment and machinery.

4.2.6 Evaluation Group F

Totaling approximately 24 acres, Evaluation Group F comprises 9 lots. It is located immediately along the eastern side of Wagner Creek Road, a rural collector, approximately a ½ mile south of the City boundary. The group is bounded on nearly all sides by EFU lands. To the southwest is a small subdivision of Urban Residential lands. Group F consists entirely of lots zoned RR-5.



4.2.6.1 Efficient Accommodation of Identified Land Needs

This Evaluation Group is located distant from the City and District facilities. No parcels are owned by the District. Nearly all of the constituent parcels have substantial quantities of residential improvements. The lots are generally small, with most under 5 acres in size.

4.2.6.2 Orderly and Economic improvements Provision of Facilities and Services

Immediate access onto a collector that nevertheless has limited connections to the regional transportation system. The travel distance to Highway 99 is over 1.5 miles and Colver Road is nearly 2 miles away. No abutting lots have water or sewer services. The nearest sewer line is a ½ mile away as the crow flies and would require crossing substantial numbers of EFU properties. No comparative disadvantage to creation of stormwater facilities. Relatively more distant from services because of lack of direct connections to urban core.

4.2.6.3 Comparative ESEE Consequences

- Economy: Somewhat negative, as the property is not owned by the District.
- Environmental: Somewhat negative, as a Class 1 stream, Wagner Creek, runs through the middle of the Evaluation Group . In addition, Jackson County mapping indicates two areas of wetlands distributed across the group.
- Social: Negative, as the area already features residential dwellings but is surrounded by primarily rural residential uses that would be less compatible with a more intensive school use. Access is to a collector, but poor connectivity means likely negative traffic impacts on a rural road.
- Energy: Negative, as the group is relatively quite distant to downtown services and residential areas housing District students.

4.2.6.4 Compatibility with Nearby Agricultural and Forest Resource Uses

Evaluation Group F is surrounded by farm uses in nearly all directions, including equine facilities, orchards, grass hay or alfalfa, and other crops. A school use on these lands would also represent an intensification and change of use, causing potentially more disruption to farmlands. Traffic would also likely be increased substantially should all necessary school facilities be built anew at this location, causing conflicts with farm equipment and machinery.

4.2.7 Evaluation Group G

Evaluation Group G is made up of 34 lots with a total area of ~69.5 acres. It is located along Rapp Lane to the south of the City and runs from roughly the TID irrigation canal to Quail Drive. The lots are zoned for Rural Residential uses and developed primarily with single-family dwellings.

4.2.7.1 Efficient Accommodation of Identified Land Needs

Not immediately adjacent to City limits, but less than .2 miles from the municipal boundary. Existing lots are highly parcelized, with most lots below 2 acres in size. The District does not own any of the property. The lots are developed with significant residential improvements. Unlike most Evaluation Groups, this one has some steeper slopes on its easterly and southerly sides.



4.2.7.2 Orderly and Economic Provision of Facilities and Services

Located on a dead-end road served by a local street. Water and sewer services would need to travel through intervening farmlands to reach the Group. No feasible connection to urban local streets. No comparative disadvantage to creation of stormwater facilities. More distant from services because of lack of direct connections to urban core.

4.2.7.3 Comparative ESEE Consequences

- Economy: Somewhat negative, as the property is not owned by the District.
- Environmental: Somewhat positive, as even though the group is in the Jackson County Wildfire overlay, the area is not heavily forested and no historic resources will be impacted. A portion of the group is in Deer and Elk Winter Range habitat.
- Social: Negative, as the area already features rural residential dwellings and is surrounded by primarily rural uses that would be less compatible with higher intensity school uses. Access is poor and traffic would likely have negative impacts.
- Energy: Somewhat negative, as the group is located on a dead end local street with limited connections and is approximately .75 miles from Highway 99.

4.2.7.4 Compatibility with Nearby Agricultural and Forest Resource Uses

The group abuts significant quantities of Open Space Resource and EFU lands. Nearby crops appear to be a mix including cannabis crops, grass hay and alfalfa, and grapes. A school use on these lands would also represent an intensification and change of use, causing potentially more disruption to farmlands. Traffic would also likely be increased substantially should all necessary school facilities be built anew at this location, causing conflicts with farm equipment and machinery.

4.2.8 Evaluation Group H

Totaling approximately 80 acres, Evaluation Group H comprises 13 lots. It is located immediately south of Evaluation Group G, near the end of Rapp Lane. The Group consists entirely of lots zoned for Rural Residential.

4.2.8.1 Efficient Accommodation of Identified Land Needs

The Group is located almost a mile from City limits on a west facing slope with some significant grades. A couple of larger parcels exist in the group, but most of the larger parcels are heavily forested and steep. None of the property is owned by the District.



4.2.8.2 Orderly and Economic improvements Provision of Facilities and Services

Located near the end of a dead-end road and served by a local street⁹. No potential connectivity to urban local streets. No abutting lots have water or sewer services and any potential hook up would require traversing nearly a mile over slopes. No comparative disadvantage to creation of stormwater facilities. Relatively distant from services because of lack of direct connections to urban core and dead end street.

4.2.8.3 Comparative ESEE Consequences

- Economy: Somewhat negative, as the property is not owned by the District.
- Environmental: Somewhat negative, as the area is relatively heavily forested and a large portion of the group lies within Deer and Elk Winter Range.
- Social: Negative, as the area already features rural residential dwellings and is surrounded by primarily rural uses that would be less compatible with higher intensity school uses. Access is poor and traffic would likely have negative impacts.
- Energy: Negative, as the group is located on a dead end local street with no connections and is approximately 1.3 miles from Highway 99.

4.2.8.4 Compatibility with Nearby Agricultural and Forest Resource Uses

The group abuts significant quantities of Open Space Resource and EFU lands. Nearby crops appear to be primarily grapes and timber. A school use on these lands would also represent an intensification and change of use, causing potentially more disruption to farmlands. Traffic would also likely be increased substantially should all necessary school facilities be built anew at this location, causing conflicts with farm equipment and machinery.

4.2.9 Evaluation Group I

Evaluation Group I is made up of 8 lots with a total area of ~67 acres. It is located immediately to the South of Group H, at the end of Rapp Lane. The westerly border is comprised of EFU lands, while the easterly and southerly borders are lands zoned OSR and WR. The Group lots are zoned for Rural Residential.

4.2.9.1 Efficient Accommodation of Identified Land Needs

Located over one mile from City limits on a private dead end road that has significant slopes. Existing lots are somewhat parcelized with substantial residential development. None of the properties are owned by the District.

4.2.9.2 Orderly and Economic Provision of Facilities and Services

Located at the end of a road with no alternative access or connections. Connecting water and sewer services would require traveling through intervening rural residential and farmlands over one mile.

⁹ Rapp Lane appears to be an easement or private drive at this point, as no trespassing signs are posted and mapping does not appear to show a public road at this location. However, because this was of relatively minor importance to the grading of the Group, additional research was not conducted to certify the status of Rapp Lane in this location.

Relatively more distant from services because of lack of direct connections to urban core and distance.

4.2.9.3 Comparative ESEE Consequences

- Economy: Somewhat negative, as the property is not owned by the District.
- Environmental: Somewhat negative, as the area is relatively heavily forested and a large portion of the group lies within Deer and Elk Winter Range.
- Social: Negative, as the area already features rural residential dwellings and is surrounded by primarily rural uses, such as vineyards, that would be less compatible with higher intensity school uses. Access is poor and traffic would likely have negative impacts.
- Energy: Negative, as the group is located on a dead end local street with no connections and is over 1.5 miles from Highway 99, the primary regional arterial.

4.2.9.4 Compatibility with Nearby Agricultural and Forest Resource Uses

The group abuts significant quantities of Open Space Resource and EFU lands. Nearby crops appear to be primarily grapes and timber. A school use on these lands would also represent an intensification and change of use, causing potentially more disruption to farmlands. Traffic would also likely be increased substantially should all necessary school facilities be built anew at this location, causing conflicts with farm equipment and machinery.

4.2.10 Evaluation Group J

Group J is the land designated as Talent Urban Reserve TA-2. TA-2 is approximately 5 acres and consists of 1 whole parcel and the portion of a larger parcel. It is located immediately adjacent to the municipal boundary, at the corner where W Rapp Road, E Rapp Road, and Helms Rd meet. The easterly border of the group consists of lands within the UGB. The Group is zoned EFU. Recently, the land has been used for cannabis crop production.

4.2.10.1 Efficient Accommodation of Identified Land Needs

The property is too small to accommodate the identified need of the subject amendment. The lands are not owned by the District. The land is relatively flat and immediately abuts City boundaries. The land is designated for residential uses in the RPS and Talent's Regional Plan Element.

4.2.10.2 Orderly and Economic improvements Provision of Facilities and Services

Access is provided by Rapp Road and the Group would presumably have good access to Helms Road through the lands to the east, which are in the UGB. City services and sewer are immediately adjacent.

4.2.10.3 Comparative ESEE Consequences

- Economy: Somewhat negative, as the property is not owned by the District.
- Environmental: Positive, as even though the group is in the Jackson County Wildfire overlay and portions are within the Urban/Wildland Interface Overlay, the area is not



heavily forested and no historic resources will be impacted. Wagner Creek is nearby, but does not immediately border the property.

- Social: Moderately Positive, as the abutting area already features residential dwellings and is within City limits, meaning comparatively less disruption to existing rural patterns.
- Energy: Moderately Positive, as the group is somewhat close to downtown services, and somewhat close to other District properties.

4.2.10.4 Compatibility with Nearby Agricultural and Forest Resource Uses

Evaluation Group J is part of a larger ~15 acre property that is zoned EFU. Historically, the property has not been farmed, but that changed with the relatively recent introduction of cannabis crops. The property has been more intensively used for crop production in the past few years, as has its immediate neighbor to the east. Other than the cannabis crops, most surrounding properties have little farm or forest activity. The surrounding forestry lands are primarily hardwoods mixed with brush and some pine and fir.

4.2.11 Evaluation Group K

Group K consists of the lands designated as Talent Urban Reserve TA-3 and one additional Rural Residential parcel which is immediately adjacent. The Group is approximately 135 acres and consists of either parts or the whole of 34 parcels. It is located immediately adjacent to the southeastern municipal boundary. The lands are located along both Talent Ave and S Pacific Hwy. The easterly border of the group consists of lands within the UGB. Lands on the southern side of Talent Ave are resource zoned lands, being either EFU, WR, or OSR designated. The parcels on the north side of Talent Ave are generally zoned for Rural Residential uses. The parcels on S Pacific Highway are generally zoned for General Commercial. Some parcels that are located between S Pacific Hwy and Talent Ave are zoned for both General Commercial and Rural Residential. The one parcel not within TA-3 is on the northern side of S Pacific Hwy and is zoned Rural Residential.

4.2.11.1 Efficient Accommodation of Identified Land Needs

None of the properties are owned by the District, which has the need identified in the subject amendment. The residential lands north of Talent Ave are generally located on a plateau which is separated from the commercially designated areas along S Pacific Hwy by a sharp escarpment. The lands are highly parcelized and many feature high levels of investment. A canal runs through the residential lands to the north of Talent Ave and may be a constraint.

4.2.11.2 Orderly and Economic improvements Provision of Facilities and Services

Access is provided by Talent Ave and S Pacific Hwy. The westerly border of the group is adjacent to municipal limits and services are likely able to be extended in an efficient manner. A sewer line already serves many of properties that front along the highway.

4.2.11.3 Comparative ESEE Consequences

- Economy: Negative, as the property is not owned by the District. In addition, topography may make accommodating the identified need challenging with additional costs imposed.



- Environmental: Somewhat negative, as the group is in the Jackson County Wildfire overlay, has multiple canals, a few small wetlands, and substantial portions are within Deer and Elk Winter Range.
- Social: Positive, as the area is already substantially developed and functions more or less as part of the City of Talent. School facilities would be less out of character in an area already developed with a mix of uses.
- Energy: Somewhat negative, as the group is located more distant from District facilities than any other group. This is somewhat ameliorated by the immediate and easy access to existing higher order roads, including an important regional arterial.

4.2.11.4 Compatibility with Nearby Agricultural and Forest Resource Uses

The residential parcel north of S Pacific Hwy is surrounded on three sides by EFU lands. However, these lands are all owned by the County and function as part of the Bear Creek Greenway. Additional EFU lands are located to the southwest of the Group, but these are forested hillside parcels with no evidence of active farm uses. The abutting forestry lands to the south and southeast are predominantly lowland hardwoods with no apparent commercial forestry management practices. Given the slopes and size of the properties involved, there appears to be sufficient area for buffering and mitigation of potential conflicts.

4.2.12 Evaluation Group L

Evaluation Group L is made up of 10 lots with a total area of ~10.5 acres. Most of the lots are owned by public entities, consisting of Jackson County, the Medford Irrigation District, or the federal government. The group is located primarily on the northern side of Suncrest Road, with most of the lands sandwiched between I-5 and the Bear Creek Greenway. Immediately to the north is an I-5 rest stop. The parcels are zoned for RR-5 or RR-00. Three of the lots have residential improvements.

4.2.12.1 Efficient Accommodation of Identified Land Needs

Immediately across Suncrest Road from City limits. None of the parcels are owned by the District. Existing lots are parcelized, with an average lot size of around 1 acre. The group incorporates a small hill and Bear Creek runs through the center of the group.

4.2.12.2 Orderly and Economic Provision of Facilities and Services

Suncrest Road is a collector street. Water and sewer are available in an adjacent subdivision, but would need to cross Bear Creek in order to serve most of the properties. Some connectivity connection to urban local streets. No comparative disadvantage to creation of stormwater facilities. Close to other services. Fire District 5 headquarters is approximately ½ mile distant.

4.2.12.3 Comparative ESEE Consequences

- Economy: Negative, as the property is not owned by the District. In addition, topography may make accommodating the identified need challenging with additional costs imposed.
- Environmental: Negative, as the majority of the group is within the Bear Creek Greenway overlay and borders the creek on both sides.



- Social: Somewhat negative, as the area already features limited improvements, but any development in the area would significantly affect a regional trail of significant importance used for recreation and transportation.
- Energy: Moderately positive, as the group is somewhat close to downtown services and regional connectors.

4.2.12.4 Compatibility with Nearby Agricultural and Forest Resource Uses

The group does abut EFU lands to the north and west. However, most of these lands are occupied by permanent non-farm uses. Lands to the north consist mostly of either the Bear Creek Greenway and riparian area or an interstate rest stop. A corner of the group does abut an orchard to the west, but the shared border is small and approximately 250 linear feet.

4.2.13 Evaluation Group M

Totaling approximately 27 ½ acres, Evaluation Group M comprises 7 lots. The Group is located at the corner of Highway 99 and Suncrest Road. The Group consists entirely of lots zoned for rural residential uses. The headquarters for Fire District #5 is on a parcel in this group.

4.2.13.1 Efficient Accommodation of Identified Land Needs

This Evaluation Group is located in an advantageous location adjacent to the City and has flat topography. Lots are decently sized, with several around 5 acres or greater. Fire District #5 headquarters occupy one of the largest parcels. Improvements on the property are valued at over \$1.5 million dollars by the County assessor. Three other parcels feature residences and assorted associated improvements. The District does not own any of the parcels.

4.2.13.2 Orderly and Economic improvements Provision of Facilities and Services

Immediate access to Highway 99, an important regional artery. City has planned a network of local streets that connect with Suncrest Road to the east. Abutting lots have urban services, including sewer and water.

4.2.13.3 Comparative ESEE Consequences

- Economy: Negative, as the District does not own the property and would be required to purchase it.
 - Environmental: Neutral, as even though the group is in the Jackson County Wildfire Overlay, the area is not heavily forested and no historic resources will be impacted. The middle of the property does appear to host a wetland of approximately 3 acres. The group also abuts the Bear Creek Greenway, but the riparian area is buffered by multiuse path.
 - Social: Moderately Positive, as the area already features substantial improvements and abuts City limits, meaning comparatively less disruption to existing rural patterns. Access is direct to a primary regional artery that likely already carries existing school traffic, thus limiting potential traffic impacts.
 - Energy: Positive, as the group has immediate access to a primary regional artery that connects Phoenix and Talent.
-



4.2.13.4 Compatibility with Nearby Agricultural and Forest Resource Uses

The group does not abut a forestry or farm use on three sides, but the north side shares a border with EFU lands for approximately 600 feet. These lands are host to a Harry and David orchard. The orchard is separated from the Group by an existing irrigation canal and a significant grade difference.

4.2.14 Evaluation Group N

Evaluation Group N is made up of 13 lots with a total area of approximately 24.5 acres. Nearly every lot is zoned RR-5, with one zoned RR-00. The group is located along S Pacific Hwy. Two parcels totaling approximately 1.67 acres are located on the west side of the highway, while the rest are across the street on the eastern side. The easterly border is comprised entirely of Harry and David orchards. To the west are mostly EFU lands with a smattering of rural residential zoned lands. Most of these parcels are developed with residential improvements and intensive farm uses appear to be limited. Most of the parcels are located on a relatively flat bench between the highway and the orchard lands down below.

4.2.14.1 Efficient Accommodation of Identified Land Needs

Not immediately adjacent to City limits, but less than 1/3rd of a mile from the municipal boundary. None of the properties are owned by the District. Existing lots are parcelized and most have significant levels of constructed improvements. The two largest parcels, consisting of some 10 acres, are intensively developed. The existing improvements include the Jackson County Community Justice Transition Center, the center for Jackson County Animal Services, and offices of the Southern Oregon Education Service District.

4.2.14.2 Orderly and Economic Provision of Facilities and Services

Immediate access to Highway 99, an important regional artery. An 8 inch RVSS sewer line already serves most, if not all, of the Group. Potential connectivity with an urban street network is quite limited because of topographical constraints. The same topography may present limitations on the ability to construct stormwater detention facilities. Although not immediately adjacent to a city core and services, S Pacific Hwy provides quick and easy access to most services.

4.2.14.3 Comparative ESEE Consequences

- Economy: Somewhat negative, as the property is not owned by the District.
- Environmental: Positive, as even though the group is in the Jackson County Wildfire overlay, the area is not heavily forested and no historic resources will be impacted.
- Social: Positive, as the area already features residential dwellings and relatively intensive governmental services. Access is direct to a primary regional artery that likely already carries existing school traffic, thus limiting potential traffic impacts.
- Energy: Positive, as the group has immediate access to a primary regional artery that connects Phoenix and Talent.



4.2.14.4 Compatibility with Nearby Agricultural and Forest Resource Uses

The eastern border of the group consists of EFU lands. These lands are host to a large orchard. However, the orchard is separated from the Group by an existing irrigation canal and a significant grade difference. Lands to the west are zoned EFU, but most parcels appear to be occupied by primarily residential uses. Some apparent uses include limited livestock or horse keeping, hay or grass alfalfa, and cannabis production. However, these uses are mixed in between existing residential uses and adjacent to the existing more intensive commercial and government uses. It is unlikely that a change in use to the proposed school use would create greater incompatibility than the existing uses.

4.2.15 Evaluation Group O

Totaling approximately 10 acres, Evaluation Group O is comprised of only 2 lots. It is located to the west of Group N along the northern side of Hartley Road. It is bordered to the west by Hartley Lane (a separate road that parallels the railroad, despite a similar name) and a railroad. Lands to the north and east are zoned EFU and developed with residential dwellings. The two constituent lots are zoned RR-5 and both are developed with detached single family homes.

4.2.15.1 Efficient Accommodation of Identified Land Needs

Neither parcel is owned by the District. The quantity of land in the group is not enough to accommodate the established need. Both parcels are already developed with single family homes and associated improvements. Hartley Road is unpaved.

4.2.15.2 Orderly and Economic improvements Provision of Facilities and Services

Access is via a gravel road and there is no immediate access onto a collector or arterial. Potential connectivity to urban local streets is limited. No abutting lots have water service, but RVSS does have a sewer main that runs along Hartley Road. No comparative disadvantage to creation of stormwater facilities. Close to town and other services.

4.2.15.3 Comparative ESEE Consequences

- Economy: Somewhat negative, as the property is not owned by the District.
- Environmental: Somewhat positive, as even though the group is in the Jackson County Wildfire Overlay, the area is not heavily forested and no historic resources will be impacted. Jackson County's online Interactive Mapping software does show a drainage and associated wetlands running north to south across the westerly property and through a pond.
- Social: Somewhat negative, as the Group is surrounded entirely by farmlands. Many of these lands have existing residential improvements, but are still rural in nature. Developing school facilities in Group O would represent a significant increase in intensity of use. Likely substantial new quantities of trips would be added to Hartley Lane, further disrupting the rural atmosphere.
- Energy: Somewhat negative, as the group is one of the most distant from City services and approximately 1,000 feet from S Pacific Hwy.

4.2.15.4 Compatibility with Nearby Agricultural and Forest Resource Uses

The Evaluation Group is surrounded entirely by lands zoned EFU. Land to the west features a large commercial greenhouse, likely for cannabis production, while lands to the north, east, and south do not appear to be intensively cultivated. The property to the south is a now defunct orchard, while lands to the north and east are developed with residential uses. The lots developed with residential uses may feature some low intensity farm uses, such as small livestock or grass hay or alfalfa. The most intense use, the greenhouse, is separated from the Evaluation Group by Hartley Lane and a railroad.

4.2.16 Evaluation Group Q

Evaluation Group Q is a collection of 12 mostly isolated parcels, nearly all of which are under 2 acres. These sites, being clearly undersized and spread out across the study area, have been grouped together. 11 of the parcels are to the east of Interstate 5, while one is located to the west of the freeway along Colver Rd.

4.2.16.1 Efficient Accommodation of Identified Land Needs

None of the parcels are owned by the District or part of the LRFMP. Being so small, none of the constituent parcels could come close to accommodate the identified need. Nearly all of these parcels are located east of Interstate 5 and typically isolated amongst farm uses. Few are adjacent to urbanized uses.

4.2.16.2 Orderly and Economic improvements Provision of Facilities and Services

Access to most parcels is via county collector roads. Potential connectivity to urban local streets is limited. Nearly all are distant from existing water and sanitary sewer services.

4.2.16.3 Comparative ESEE Consequences

- Economy: Negative, as the District does not own the property and the disparate nature of the lots would create inefficiencies.
- Environmental: Somewhat positive, as even though the group is in the Jackson County Wildfire overlay, most properties are not heavily forested and no historic resources will be impacted.
- Social: Negative, as the most of the Evaluation Group is surrounded entirely by farmlands. Many of these lands have existing residential improvements, but are still rural in nature. Developing school facilities in this Group would represent a significant increase in intensity of use. Likely substantial new quantities of trips would be added to county roads that currently serve primarily residents and farm uses, further disrupting the rural atmosphere.
- Energy: Negative, as the group is wide spread and mostly located far from existing school facilities.

4.2.16.4 Compatibility with Nearby Agricultural and Forest Resource Uses

The parcels in the Evaluation Group to the east of Interstate 5 are surrounded by lands zoned for EFU. Surrounding uses include a greenhouse, likely for cannabis production, pasturelands, grass



hay or alfalfa, and field grown cannabis. The property to the west of Interstate 5 is surrounded by EFU lands to the east, north, and west. These lands appear to be used primarily for residential uses, despite their EFU zoning. In particular, a new subdivision, approved under Measure 37 is in the process of development. To the south is the Colver Rd property owned by the District.

4.2.17 Goal 14 Factor 2 Ranking of First Priority Evaluation Groups

After qualitatively and quantitatively evaluating each group according to the method described in 4.1.2, the following scores were assigned for Factor 2:

Goal 14 Factor 2 Rank						
Group	Water	Sewer	Storm*	Transportation	Factor 2 Combined Score	Factor 2 Rank
A	2	1	8	1	2	1
N	1	1	8	2	2	1
B	3	1	8	4	3	3
J	4	1	8	5	3.5	4
M	7	1	8	3	3.75	5
D	6	1	8	6	4.25	6
L	5	1	8	10	5	7
C	5	9	8	7	6.25	8
O	9	1	8	12	6.5	9
K	8	10	8	8	7.5	10
G	11	11	8	11	9.25	11
F	12	12	8	9	9.25	11
E	13	13	8	13	10.75	13
H	14	14	8	14	11.5	14
I	15	15	8	15	12.25	15
Q	16	16	8	16	13	16

*Stormwater was assigned a half weight in the ranking, as discussed above in section 4.1.2

In general, the lots that are located in the urban reserve areas scored better than the other evaluation groups. They are generally closer to water, sewer, and transportation infrastructure that supports urbanization. Evaluation groups with a “1” score for the Sewer factor have a sanitary sewer either already extended to the properties, such as Evaluation Groups B and N, or are adjacent to them. There are no easily discernable differences to supplying stormwater facilities to the differing Evaluation Groups, and thus they have all been given the same score. Atlas Page 11 is a visual representation of the scores.



4.2.18 Goal 14 Factor 3 Ranking of First Priority Evaluation Groups

After qualitatively and quantitatively evaluating each group according to the method described in 4.1.2, the following scores were assigned for Factor 3:

Goal 14 Factor 3						
Group	Economic	Environmental	Social	Energy	Factor 3 Combined Score	Factor 3 Rank
B	1	4	3	4	3	1
A	15	1	2	2	5	2
N	12	7	1	1	5.25	3
M	12	2	5	3	5.5	4
K	14	3	4	10	7.75	5
C	12	6	9	5	8	6
J	12	5	7	9	8.25	7
D	12	12	6	6	9	8
O	12	8	12	7	9.75	9
G	12	9	8	11	10	10
F	12	10	11	12	11.25	11
L	13	15	10	8	11.5	12
E	12	11	13	13	12.25	13
H	12	13	14	14	13.25	14
I	12	14	15	15	14	15
Q	16	16	16	16	16	16

In general, again, the urban reserves generally score better than the exception lands. This a logical outcome, as these lands have already gone through the intensive RPS to examine suitability for urbanization and were found to be the best candidates. These lots are generally adjacent to areas that are already more developed and would have less impact on existing rural lifestyles.

Evaluation Group B scored the best on economic score, as it is the only property owned already by the District and would likely require the least expenditure of public funds to bring to a developable state. Properties that are not owned by the District but lack any other obvious economic deficiencies were generally equivalent and substantially worse than Evaluation Group B. The properties with the lowest economic score had other negative factors, such as being required by the RPS to serve industrial uses only or challenging terrain that would make development more expensive. Atlas Page 12 is a visual representation of the scores.

4.2.19 Goal 14 Factor 4 Ranking of First Priority Evaluation Groups

After qualitatively and quantitatively evaluating each group according to the method described in 4.1.2, the following scores were assigned for Factor 4:



Goal 14 Factor 4		Goal 14 Factor 4	
Group	Rank Blank Slate	Group	Rank Actual Dev
M	1	M	1
A	2	N	2
N	3	B	3
L	4	K	4
K	5	A	5
B	6	L	6
J	7	J	7
O	8	O	8
D	9	D	9
G	10	G	10
H	11	H	11
I	12	I	12
F	13	F	13
E	14	E	14
C	15	C	15
Q	16	Q	16

As noted herein above in Section 4.1.2, Factor 4 is being considered in two ways. One way is to consider the subject property evaluation group from a farm impacts standpoint without regard to the existing development (Blank Slate) and uses on the site and the other scoring method accounts for agricultural use compatibility in relation to the physical development and uses already located on the site (Actual Development).

Nearly every group is immediately adjacent to some lands designated as Farm or Forestry lands. The lands that have minimal exposure to intensive farm or forestry uses are rated most highly. Separation from EFU lands by existing higher order roads, topography, or other natural buffers also ameliorates potential impacts and increase compatibility. The lands adjacent to the UGB again generally score the best on this Factor.

The scores do differ slightly between the two methodologies. Evaluation Groups K, B, and N score better when existing development is considered. These groups have some significant development already that is sited next to farm and forestry uses. Atlas Pages 13 and 14 are visual representations of the scores.

4.2.20 Results of Goal 14 Factors 2 through 4 for Evaluation Groups

After evaluating each group by the three factors above, an overall ranking was assigned by averaging the scores. A map of the Evaluation Group ranking results across all Goal 14 Boundary Location Factors is shown on Atlas Page 15 and 16. As noted, there are two composite scores,



each based on a slightly different farm impacts methodology. The two composite score results are seen in the table below:

Factors 2, 3, & 4 Location Ranking (presuming no development for Farm Impacts)		
Group	Average Boundary Factor Rank	Evaluation Group Rank
A	1.7	1
N	2.3	2
B	3.3	3
M	3.3	3
J	6.0	5
K	6.7	5
D	7.7	7
L	7.7	8
O	8.7	9
C	9.7	10
G	10.3	11
F	11.7	12
H	13.0	13
E	13.3	14
I	14.0	15
Q	16.0	16

Factors 2, 3, & 4 Location Ranking (presuming existing development for Farm Impacts)		
Group	Average Boundary Factor Rank	Evaluation Group Rank
N	2.0	1
B	2.3	2
A	2.7	3
M	3.3	4
J	6.0	5
K	6.3	6
D	7.7	7
L	8.3	8
O	8.7	9
C	9.7	10
G	10.3	11
F	11.7	12
H	13.0	13
E	13.3	14
I	14.0	15
Q	16.0	16

In either methodology, the top four Evaluation Groups are the same. Evaluation Groups N and B do slightly better in the second case, while Group A benefits in the first.

4.2.21 Goal 14 Factor 1 Analysis

As noted herein above in Section 4.1.2, a Factor 1 analysis is dissimilar to the other Factors for the identified need. The ranking of Factors 2 through 4 serves as a “reasonableness” test for inclusion of the School District property when compared to the other Evaluation Groups. If Evaluation Group B had scored quite poorly, it would be a sign that even if a Factor 1 analysis favored Group B other factors may warrant inclusion of other lands in the UGB.

As shown in the rankings above, Evaluation Group B ranks as the either the second best or third best group. Thus, Evaluation Group B passes this reasonableness test. Three other groups in the top four score quite closely. These Groups, A, M, and N will be examined in turn for their Factor 1 characteristics. The remainder of the Evaluation Groups score as less appropriate and it is reasonable to conclude that if these three other Groups cannot match Evaluation Group B from a Goal 14 Factor 1 analysis then the remainder of the Groups are less likely to do so.



Should one of Evaluation Groups A, M, or N perform reasonably well in a Factor 1 analysis in comparison to Evaluation Group B, they may be an appropriate place to accommodate the identified need and further analysis should be undertaken. However, should these lands rate poorly in a Factor 1 analysis, it is reasonable to conclude that Group B is the most appropriate location for the identified need even if all the groups otherwise scored closely in the ranking analysis of Factors 2, 3, and 4.

4.2.21.1 Evaluation Group A Factor 1 Analysis

Evaluation Group A has the best cumulative score for Factors 2 through 4. Evaluation Group B scored better in the Factor 3 ESEE analysis, but slightly worse in Factors 2 and 4. However, Group A has several characteristics which make it significantly less appropriate as a location to efficiently accommodate the identified land need than Evaluation Group B.

First, most of Evaluation Group A is part of established Urban Reserve TA-4. As an Urban Reserve it is subject to the acknowledged Regional Problem Solving Process, which was adopted in the City of Talent Comprehensive Plan as Element H Regional Plan. This Regional Plan has acknowledged restrictions on uses of some Urban Reserve lands. In Section 5 Performance Indicators of Element H, Performance Indicator 9 applies the following conditions to specific Urban Reserve Areas:

TA-1. Development of TA-1 is restricted to use as a school or a park/open space/recreational area.

TA-4. Development on the portion of TA-4 east of the railroad shall be restricted to industrial uses.

TA-ROW. Development of TA-ROW is restricted to transportation uses and shall be a maximum of 120' in width.

The lands east of the railroad consist of over 20 acres. Correspondingly, the preponderance of Evaluation Group A could not be used for the identified need without modification of Element H of the Talent Comprehensive Plan and, correspondingly, the Regional Problem Solving Plan. There is no guarantee such a change could be accomplished or is even desirable to policy makers. This would require additional land use actions and the process would be fraught with uncertainty.

Second, portions of the Evaluation Group are already developed with uses that are not easily redeveloped and do not complement the proposed need. For example, Tax Lot 2100 is owned by PacifiCorp and developed with an existing transformer station. Another parcel, Tax Lot 2000, is listed under the ownership of a religious organization and appears to be the site of an existing cemetery. These existing uses would either need to be removed or would limit the available area for the identified need.

Third, Evaluation Group B is under the ownership of the District, consists of one lot that is developed with uses that facilitate the identified need, and restricted to the existing and proposed uses by the RPS. Group N lacks all these characteristics. In order to use Evaluation Group A to accommodate the need, multiple parcels would need to be assembled and purchased. It is unlikely that PacifiCorp would be willing to part with its property and relocate infrastructure at a price that would make the transaction efficient for the District. Purchasing these properties in order to relocate existing school facilities that are already sited on a property owned by the District does not represent an efficient use of the District's budget. Because the District is publicly funded, the inclusion of Evaluation Group A would not represent an efficient use of public monies.

Given these hurdles, it is reasonable to conclude that Evaluation Group A is a significantly inferior alternative to Evaluation Group B according to a Factor 1 analysis when it comes to accommodating the specific identified need of the subject amendment.



4.2.21.1 Evaluation Group M Factor 1 Analysis

Evaluation Group M scores similarly to Group B in the composite score of Factors 2, 3, and 4. Despite consisting of a recognized Urban Reserve, TA-5, this Group does not have restrictions set forth by the established RPS agreement. It is however set aside in Element H of the Talent Comprehensive Plan as lands for a mixture of residential, employment, and parks land. The proposed mix is 43% residential, 49% employment, and 8% parks.

Group M lacks sufficient acreage to accommodate the identified need. The lands total ~27 ½ acres between 7 different lots. The largest lot is owned by Fire District 5 and is the site of the Fire District Headquarters. The Headquarters was constructed in 2004 and will be fit to serve the Fire District for many years to come. Other lands include large lot residential uses and empty lots. That status of the residential lands is uncertain, as they appear to have suffered significant structural losses in the 2020 Almeda Fire. If rebuilt, these lands are less likely to be available for redevelopment. The group also shows evidence of wetlands, which would further limit developable areas.

Most importantly, Evaluation Group B, is under the ownership of the District, consists of one lot that is developed with uses that facilitate the identified need, and restricted to the existing and proposed uses by the RPS. Evaluation Group M lands are not owned by the District nor are they planned for school facilities in either the LRFMP or by the City of Talent. Group M lands are developed with uses that are not part of the identified needs and are likely to continue to host at least some of the uses for the long term. Given that selected lands for inclusion need to be large enough to accommodate the identified need, there is not enough space in Evaluation Group M. Additionally, purchasing these properties in order to relocate existing school facilities that are already sited on a property owned by the District does not represent an efficient use of the District's budget. Because the District is publicly funded, the inclusion of Evaluation Group M would not represent an efficient use of public monies.

It is not clear that including these lands, which as noted are currently planned by the City for a mixture of residential and commercial uses, would be a welcome outcome for the City. The City's adopted Housing Element calculated a deficiency of residential lands across all categories. Using all of these lands for a school use could further exacerbate residential buildable lands deficiencies.

For these reasons, it is reasonable to conclude that Evaluation Group M is a significantly inferior alternative to Evaluation Group B according to a Factor 1 analysis when it comes to accommodating the specific identified need of the subject amendment.

4.2.21.2 Evaluation Group N Factor 1 Analysis

Evaluation Group N scores similarly to Group B in the composite score. Unlike Evaluation Groups A, B, and M, Evaluation Group N is not part of an established Urban Reserve.

Group N lacks sufficient acreage to accommodate the identified need. The lands total ~24 ½ acres between 13 different lots. Each of these lots has some level of improvements, including some significant regional institutions. Two lots totaling approximately 10 acres host the Jackson County Community Justice Transition Center, the center for Jackson County Animal Services, and offices

of the Southern Oregon Education Service District. The improvements on these two parcels alone were approximately \$5,000,000 according to the Jackson County Assessor¹⁰.

Because these lands lie outside of an established Urban Reserve, it is not clear that including these lands in a UGB amendment would be allowed under the RPS agreement. In Section 5 Performance Indicators of Element H, Performance Indicator 13 applies the following conditions:

Urban Growth Boundary Amendment. Pursuant to ORS 197.298 and Oregon Administrative Rule 660-021-0060, URAs designated in the Regional Plan are the first priority lands used for a UGB amendment by participating cities.

Land outside of a city's URA shall not be added to a UGB unless the general use intended for that land cannot be accommodated on any of the city's URA land or UGB land.

Taken at face value, it would appear to eliminate this Evaluation Group from further consideration. It is however ambiguous as to how these requirements could be reconciled with the priority criteria set forth in Oregon Revised Statutes and Division 24. Because of this ambiguity, attempting to incorporate these lands in the UGB, even if they were deemed the most appropriate after all the previous analysis, would add uncertainty to the proceedings.

More importantly, these lands are not owned by the District nor are they planned for school facilities in either the LRFMP or by the City of Talent. Evaluation Group N lands are intensively developed with uses that are not part of the identified needs and likely to continue to host at least some of the uses for the long term. Given that selected lands for inclusion need to be large enough to accommodate the identified need, there is not enough space in this Evaluation Group. Purchasing these properties in order to relocate existing school facilities that are already sited on a property owned by the District does not represent an efficient use of the District's budget. The District is publicly funded and these decisions would not represent an efficient use of public monies.

For these reasons, it is reasonable to conclude that Evaluation Group N is a significantly inferior alternative to Evaluation Group B according to a Factor 1 analysis when it comes to accommodating the specific identified need of the subject amendment.

4.3 Application of Comprehensive Plan Regulations

Per Division 24, the analysis of which lands to add to the UGB requires the application of applicable criteria in the acknowledged comprehensive plan and land use regulations acknowledged prior to the initiation of the UGB amendment after performing a Boundary Locations Analysis.

The Talent comprehensive plan has elements which affect this subject amendment. Chief amongst them is the acknowledged Regional Problem Solving Process, which was adopted in the City of Talent Comprehensive Plan as the Element H Regional Plan. This Element H has acknowledged restrictions on uses of Urban Reserve lands. These were discussed as part of the foregoing Factor 1 analysis, as it makes little sense to analyze them separately when considering "efficient accommodation of identified land needs." The identified RPS restrictions may relate to *regulatory* efficiency, but they add significant burdens to the incorporation of some of the Evaluation Groups, specifically A, M, and N.

¹⁰ The Alameda Fire did destroy the Southern Oregon Education Service District campus located within this Evaluation Group. It is unclear at this time as to whether the campus will be rebuilt or relocated.

Further, the Talent Comprehensive Plan does offer additional explicit support for the inclusion of Evaluation Group B into the UGB. Element H's ESEE analysis of TA-1 states that "[a]s the area is already committed to school facility uses, it would efficiently accommodate the City's identified land needs for public and institutional land needs."

Additionally, the City's adopted Comprehensive Plan Public Facilities Element has Objective 5.1.2, which instructs the City to work with the District to ensure available land is provided for school needs, including specifically supporting an UGB amendment to include the land that makes up Evaluation Group B.

Finally, when the Jackson County Board of Commissioners approved the exception to bring sanitary sewer services to the property¹¹, it at the same time officially declared support for the inclusion of the property into the UGB.

In total, the Talent Comprehensive Plan, the RPS Plan, and the past actions of the County indicate support for the inclusion of Evaluation Group B over other groups, to the point of specifically noting that this property is limited to the same use as the identified need.

4.4 First Priority Lands Results

Following the application of the preceding Boundary Location Factors, Evaluation Group B was found to be the most appropriate location for inclusion in the UGB. Further, after a review of the City of Talent Comprehensive Plan and the RPS plan, Evaluation Group B was specifically identified as an Urban Reserve that was appropriate for accommodating the specific need identified herein. Further support comes from the Talent Public Facilities Element and a Jackson County Board Order.

Thusly, it is concluded that Evaluation Group B, consisting of the TA-1, or Tax Lot 1000 owned fee simple by the District, is the most appropriate land to include in the UGB and has sufficient area to accommodate the identified need. This amendment will include the Colver Road abutting public right-of-way, as is deemed required by the local jurisdictional agreements, but exclude the 12 easterly acres of the properties that would otherwise exceed the quantity of land required by the identified need. The proposed inclusion is found on Atlas Page 17.

5 PRIORITY 2 MARGINAL LANDS REVIEW

ORS 197A.320(2)(c)(B) states that if land under subparagraph (A) of this paragraph is inadequate to accommodate the amount of land needed, the City shall evaluate lands within the study area that is designated as marginal land. Because there is sufficient first priority land to accommodate the identified need, further analysis of the second priority land is not unnecessary. Moreover, Jackson County contains no land designated marginal land.

6 PRIORITY 3 MARGINAL LANDS REVIEW

ORS 197A.320(2)(c)(C) states that if land under subparagraphs (A) and (B) of this paragraph is inadequate to accommodate the amount of land needed third priority land may be included. Third

¹¹ Via Board Order 402-05



priority lands are lands that are lands that do not consist of soils that are predominantly high value farm soils or farm soils designated prime or unique. Because there is sufficient first priority land to accommodate the identified need, further analysis of the third priority land is not unnecessary.

7 PRIORITY 4 RESOURCE LANDS REVIEW

ORS 197A.320(2)(c)(D) states that if land under subparagraphs (A) to (C) of this paragraph is inadequate to accommodate the amount of land needed fourth priority land may be included. Fourth priority lands are lands that are lands that are predominantly high value farm soils or farm soils designated prime or unique. Because there is sufficient first priority land to accommodate the identified need, further analysis of the fourth priority land is not unnecessary.

8 ALTERNATIVE SITES RESULTS

All study lands were thoroughly evaluated consistent with priority lands statute ORS 197A.320 to be considered for inclusion within the City of Talent Urban Growth Boundary with the purpose of satisfying an identified need for public facilities, specifically a Large District School Facility.

Based upon the candidate lot evaluation, an Urban Growth Boundary expansion that includes ~31 acres of Tax Lot 1000 (Evaluation Group B or Urban Reserve TA-1) together with right of way on Colver Rd is consistent in all ways with the priority lands statute at ORS 197A.320 and inclusion of these lands represents a reasonable and appropriate balance of the four boundary location factors of Statewide Planning Goal 14 and the comprehensive plan and adopted land use regulations in effect at the time of the initiation of this subject amendment.