



# Oregon

Theodore R. Kulongoski, Governor

## Department of Land Conservation and Development

Southern Oregon Field Office

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April 22, 2010

Margaret Borgen  
Bo Box 2010  
Shady Cove, Oregon 97539

Subject: Proposed Comprehensive Plan and Zone Change for 19.59 acres, local file ZC 10-01, DLCD file 001-10

Dear Margaret:

The department appreciates the opportunity to comment on this proposal. As we understand it the proposal is to change the comprehensive plan designation and zoning for 19.59 acres along the Rogue River from Public Use to R-2 residential.

We have the following comments:

1. The proposal does not comply with statewide Goal 5 because the city has not adopted any riparian protections for the riparian corridor along the Rogue River. At a minimum the city should adopt the safe harbor standard of 75 feet setback from any structures from the mean high water line.
2. The proposal does not comply with Goal 12 and the transportation planning rule (TPR). There is no sound traffic impact study for this proposal. The exhibits include only a speculative trip reduction using the Trip Generation Handbook of the Society of Transportation Engineers and based on speculative development plans. A better study is needed before there can be any certainty that the proposal complies with the TPR.

We strongly recommend the city take no action on this proposal until they can demonstrate adequate compliance with Goals 5 and 12.

Please place these comments in the record for this matter. Should you have any questions regarding these comments please do not hesitate to contact me at (541) 858-3189 or by e-mail at [john.renz@state.or.us](mailto:john.renz@state.or.us).

Sincerely,

John Renz  
Southern Oregon Regional Representative