



Oregon

Theodore R. Kulongoski, Governor

Department of Land Conservation and Development

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NOTICE OF ADOPTED AMENDMENT

April 5, 2007

TO: Subscribers to Notice of Adopted Plan or Land Use Regulation Amendments

FROM: Mara Ulloa, Plan Amendment Program Specialist

SUBJECT: City of Roseburg Plan Amendment
DLCD File Number 008-06



The Department of Land Conservation and Development (DLCD) received the attached notice of adoption. Copies of the adopted plan amendment are available for review at DLCD offices in Salem, the applicable field office, and at the local government office.

Appeal Procedures*

DLCD ACKNOWLEDGMENT or DEADLINE TO APPEAL: April 19, 2007

This amendment was submitted to DLCD for review prior to adoption with less than the required 45-day notice. Pursuant to ORS 197.830 (2)(b) only persons who participated in the local government proceedings leading to adoption of the amendment are eligible to appeal this decision to the Land Use Board of Appeals (LUBA).

If you wish to appeal, you must file a notice of intent to appeal with the Land Use Board of Appeals (LUBA) no later than 21 days from the date the decision was mailed to you by the local government. If you have questions, check with the local government to determine the appeal deadline. Copies of the notice of intent to appeal must be served upon the local government and others who received written notice of the final decision from the local government. The notice of intent to appeal must be served and filed in the form and manner prescribed by LUBA, (OAR Chapter 661, Division 10). Please call LUBA at 503-373-1265, if you have questions about appeal procedures.

***NOTE: THE APPEAL DEADLINE IS BASED UPON THE DATE THE DECISION WAS MAILED BY LOCAL GOVERNMENT. A DECISION MAY HAVE BEEN MAILED TO YOU ON A DIFFERENT DATE THAN IT WAS MAILED TO DLCD. AS A RESULT YOUR APPEAL DEADLINE MAY BE EARLIER THAN THE DATE SPECIFIED ABOVE.**

Cc: Gloria Gardiner, DLCD Urban Planning Specialist
John Renz, DLCD Regional Representative
Brian Davis, City of Roseburg

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FORM **2**

DLCD

Notice of Adoption

In person electronic mailed

DEPT OF

MAR 30 2007

LAND CONSERVATION
AND DEVELOPMENT

For DLCD Use Only

THIS FORM **MUST BE MAILED** TO DLCD
WITHIN 5 WORKING DAYS AFTER THE FINAL DECISION
PER ORS 197.610, OAR CHAPTER 660 - DIVISION 18

Jurisdiction: **City of Roseburg**

Local file number: **CPA-06-4**

Date of Adoption: **3/26/2007**

Date Mailed: **3/28/2007**

Was a Notice of Proposed Amendment (Form 1) mailed to DLCD? **Yes** Date: **10/27/2007**

Comprehensive Plan Text Amendment

Comprehensive Plan Map Amendment

Land Use Regulation Amendment

Zoning Map Amendment

New Land Use Regulation

Other:

Summarize the adopted amendment. Do not use technical terms. Do not write "See Attached".

Residential Buildable Lands Inventory and Housing Needs Analysis
1,035 acres needed to meet 2027 housing needs

Does the Adoption differ from proposal? No, no explanation is necessary

Plan Map Changed from:

to:

Zone Map Changed from:

to:

Location:

Acres Involved:

Specify Density: Previous:

New:

Applicable statewide planning goals:

1 **2** **3** **4** **5** **6** **7** **8** **9** **10** **11** **12** **13** **14** **15** **16** **17** **18** **19**

Was an Exception Adopted? YES NO

Did DLCD receive a Notice of Proposed Amendment...

45-days prior to first evidentiary hearing?

Yes No

If no, do the statewide planning goals apply?

Yes No

If no, did Emergency Circumstances require immediate adoption?

Yes No

DLCD # 008-06(1564)

DLCD file No. _____

Please list all affected State or Federal Agencies, Local Governments or Special Districts:

Douglas County, ODOT, Roseburg Urban Sanitary Authority, Umpqua Basin Water Association

Local Contact: **Brian Davis**

Phone: (541) 440-1177 Extension:

Address: **900 SE Douglas Ave**

Fax Number: - -

City: **Roseburg**

Zip: **97470-**

E-mail Address: **bdavis@ci.roseburg.or.us**

ADOPTION SUBMITTAL REQUIREMENTS

This form **must be mailed** to DLCD **within 5 working days after the final decision**

per ORS 197.610, OAR Chapter 660 - Division 18.

1. Send this Form and **TWO Complete Copies** (documents and maps) of the Adopted Amendment to:

**ATTENTION: PLAN AMENDMENT SPECIALIST
DEPARTMENT OF LAND CONSERVATION AND DEVELOPMENT
635 CAPITOL STREET NE, SUITE 150
SALEM, OREGON 97301-2540**

2. **Electronic Submittals:** At least **one** hard copy must be sent by mail or in person, but you may also submit an electronic copy, by either email or FTP. You may connect to this address to FTP proposals and adoptions: **webserver.lcd.state.or.us**. To obtain our Username and password for FTP, call Mara Ulloa at 503-373-0050 extension 238, or by emailing **mara.ulloa@state.or.us**.
3. Please Note: Adopted materials must be sent to DLCD not later than **FIVE (5) working days** following the date of the final decision on the amendment.
4. Submittal of this Notice of Adoption must include the text of the amendment plus adopted findings and supplementary information.
5. The deadline to appeal will not be extended if you submit this notice of adoption within five working days of the final decision. Appeals to LUBA may be filed within **TWENTY-ONE (21) days** of the date, the Notice of Adoption is sent to DLCD.
6. In addition to sending the Notice of Adoption to DLCD, you must notify persons who participated in the local hearing and requested notice of the final decision.
7. **Need More Copies?** You can now access these forms online at **http://www.lcd.state.or.us/**. Please print on **8-1/2x11 green paper only**. You may also call the DLCD Office at (503) 373-0050; or Fax your request to: (503) 378-5518; or Email your request to **mara.ulloa@state.or.us** - ATTENTION: PLAN AMENDMENT SPECIALIST.



City of Roseburg

Summary of Roseburg's Residential Buildable Land Inventory

Current Residential Land Supply

• Gross vacant acres.....	1,869 acres
• Wetlands.....	(14) acres
• Hillsides	(781) acres
• Redevelopment	360 acres
• Infill	166 acres
Total	1,599 acres

2027 Demand (population → dwelling units → acres)

• 2027 population @ 2.5% annual growth.....	49,649
• Group homes (4.6%)	(2,284)
• Population divided by 2.25 person/dwelling unit.....	21,051 units
• Dwelling units needed at 93% occupancy	22,636 units
• Minus current dwelling units (9,286).....	13,350 units

Housing mix by dwelling type and density:

• Single-family units (46%), 6141 units @ 4.0 per acre	1,535 acres
• Duplexes (6%), 801 units @ 6.44 per acre.....	124 acres
• Multi-family (42%), 5607 units @ 15.98 per acre	351 acres
• Mobile homes (6%), 801 units @ 8.3 per acre	97 acres
• Acres required for parks, schools, and roads	527 acres
Total	2,634 acres

Comparison

• Current supply	1,599 acres
• 2027 demand	2,634 acres

Difference (1,035) acres

INTRODUCTION

This document summarizes the Residential Buildable Land Inventory analysis for the Roseburg Urban Growth Boundary. It addresses State Planning Goal 10, "To provide for the housing needs of citizens of the state." Goal 10, and its accompanying administrative rules, set out a process to estimate future housing needs and to analyze the supply and demand for residential land needed to accommodate future growth. Cities are required to provide a 20-year supply of residential land within their UGB at periodic review and legislative review, based on a comprehensive housing needs assessment.

This document contains; an analysis of existing buildable land, a housing needs analysis, and a comparison of the supply of buildable residential land with the forecasted housing demand. The housing need analysis forecasts housing demand to 2027. The supply analysis is based on buildable land information as of December 1, 2005. In reviewing the future needs for land and the current supply within the urban growth boundary, it has been determined that there is not a 20-year supply of buildable residential land.

Background

The City of Roseburg is the largest city and county seat of Douglas County and ranks 22nd in total population in the state. It is the cultural, commercial, economic and political hub of the County, a region encompassing some 5,071 square miles of Southwestern Oregon. It is centrally located in the heart of the county along U.S. Interstate 5 and the South Umpqua River, just south and east of its confluence with its North branch. The City Urban Growth Area stretches north-south in a narrow valley along the Interstate corridor between the North and South Umpqua Rivers. The Urban Area is virtually surrounded by steep rugged hills and ridges- a topography generally typical of the entire region.

The Urban Growth Area (UGA) for the City was initially established in 1982 and has not been significantly altered since that time. The decades that followed have seen continued overall growth in the population, which has risen from 16,644 in 1980 to 20,017 in 2000, an increase of 20 percent. The dominant role of the City as the industrial, commercial and service hub for the County has also continued to expand, particularly as a center of commerce, health and other professional services. Previous studies have indicated that the amount of land available for development within the current Urban Growth Area is becoming insufficient to meet future development needs. It also appears that most of the more level land within the UGA has been developed or is being held for needed commercial and industrial expansion, leaving housing developers in particular with limited opportunities on land that is more constrained and costly to develop.

Purpose of the Study

This study is being conducted to determine whether there is a sufficient amount of suitable land to meet future demands within the existing Urban Growth Area. In order to inform decisions regarding this primary question, the study identifies and discusses the amount, location and suitability of land potentially available for development- a Buildable Land Inventory. An analysis of the type of development that has been occurring and at what densities and land consumption rates is produced to inform projection of future needs- a Housing Type and Density Study.

Steps in the Process

Buildable Land Inventory: Identify all types of vacant, potential infill, potentially Redevelopable and environmentally constrained land within the existing UGB for residential land.

Housing Mix and Density Study: Determine types and densities of all new residential development within the UGB over the past five years and compare results to historical and possible future trends. Address all Goal 10 Housing requirements. Use *Planning for Residential Growth Workbook* as primary guide.

Housing Needs Analysis: Determine the amount of land needed to meet future demand at appropriate types and densities based on historical and potential future development trends, population changes and growth projections, and economic factors. Address all Goal 10

Housing requirements. Use *Planning for Residential Growth Workbook* as primary guide. Run Oregon Housing and Community Services Housing Needs and Land Needs Analysis Model.

Summary Results

- There are approximately 947 buildable acres of land designated for residential use within the existing Urban Growth Boundary (UGB) as of December 1, 2005.
- Redevelopment and Infill potential add 523 acres back into the supply for potential residential development for a total of **1,599** acres.
- There will be a demand for 13,350 housing units by 2027 which translates into a demand for **2,634** acres.
- The analyses performed to produce this Preliminary Report indicate that the City will have a deficit of approximately **1,035** acres of land in their residential land inventory to meet the needs of its projected population to the year 2027, based upon an annual average population growth rate of 2.5%.

Some of the assumptions made for these analyses include:

- Population will increase at an annual average growth rate of 2.5%
- The relative mix of housing types will shift 5 percent from single-family to multi-family
- The average age of the population will shift slightly toward an older age.
- The average household size will continue to decline, but at a slower rate, from 2.3 to 2.25 persons per household over the 20-year planning period.

ROSEBURG RESIDENTIAL BUILDABLE LAND INVENTORY

This chapter summarizes the methodology, assumptions, and results of the City of Roseburg's Residential Buildable Lands Inventory (BLI). The BLI inventories the *supply* of buildable residential land, including only privately-owned land that is planned for residential development, inside Roseburg's urban growth boundary (UGB), both inside and outside the city limits. For the purposes of this inventory, buildable land includes vacant residential land, excluding land that is determined unbuildable by federal, state, or local regulations, and developed land that is likely to be redeveloped at least partly for residential use. The inventory is important because it helps determine:

- Quantity and quality of vacant residential lands; and
- Capacity of the existing UGB to accommodate additional residential development.

The BLI will inventory lands by 2005 Roseburg Comprehensive Plan designation (Designation), and will ultimately estimate the number of dwelling units that can be accommodated within the UGB.

The City of Roseburg has four Designations that allow residential development including:

- High Density Residential
- Medium Density Residential
- Low Density Residential
- Residential Open Space

Methodology, Assumptions, and Results

The BLI inventories buildable residential land inside the UGB according to the following nine-step process:

1. Update land use, Plan Designation, and zoning information in the computer geographic information system (GIS).
2. Determine gross vacant privately-owned residential acreage whole or partial tax lots.
3. Determine and subtract all unbuildable residential acres.
4. Develop assumptions regarding the density and mix of housing types that are expected on buildable residential land by Designation.
5. Report gross buildable residential acreage.
6. Determine and subtract a portion of gross vacant buildable residential land needed for public facilities.
7. Calculate net buildable residential land.
8. Calculate number of dwelling units that can be accommodated on net buildable residential land.
9. Calculate number of potential infill and redevelopment acres and number of dwelling units that can be accommodated.
10. Report acres of potential residential redevelopment.

Land Use, Plan, and Zoning Information

For the purposes of this inventory, property class, land use, plan designation, and zoning data for the City of Roseburg were updated.

Gross Vacant Residential Acreage – Unimproved Land

The work performed for this analysis was based upon the Douglas County Assessor tax account records related to tax lots within the City of Roseburg Urban Growth Boundary as of December 2005. The account field “County Property Class” was the primary basis for deriving its results. For a complete listing of Douglas County Property Class Codes, see Appendix A.

The initial step in identifying land within the Urban Growth Area (UGA) available for future development was accomplished by creating a list of all county real property tax accounts designated as “unimproved.” This provides a base inventory of vacant land within the Urban Growth Boundary (UGB). The results of this initial step produced an unqualified list of all land taxed as unimproved. Summary results of this basic list for all types of “unimproved” land in the UGB are shown in Table 1 below:

TABLE 1: Total Unimproved Class UGA Property Tax Accounts

County Property Class	Acres
001	42.5
002	4.77
100	348.66
107	5.22
110	28.2
120	2.41
180	324.39
200	100.93
210	20.2
300	437.83
400	27.89
440	18.49
480	985.72
502	0.74
503	67.92
504	8.04
583	11.23
700	113.31
910	9.12
920	50.06
940	214.28
950	91.61
960	6.46
997	9.8
Total	2,929.78

Qualified Land

A quick look at the Table 1 shows that several categories of land designated by the Assessor as “unimproved” are not appropriate for inclusion in an inventory of vacant land available for future development. This is true of the “unbuildable” classes.

Removing the land described above provides the following results by County property class (Table 2) and residential Comprehensive Plan Designations (Table 3).

Table 2: Unimproved Acres by County Property Class

County Property Class	Acres
100	347.59
107	5.22
110	28.2
120	2.41
180	312.72
200	93.95
210	20.2
300	412.39
400	21.62
440	18.49
480	985.72
502	0.74
503	30.83
504	8.04
583	11.23
700	113.31
910	2.66
920	50.06
TOTAL	2,465.38

Table 3: Unimproved Acres by Comprehensive Plan Designation

COMP PLAN DESIGNATION	ACRES	% of Total
Commercial	72.16	2.9%
High Density Residential	90.07	3.7%
Industrial	477.26	19.4%
Low Density Residential	1580.97	64.1%
Medium Density Residential	164.26	6.7%
Professional Office	8.56	0.3%
Parks/Open Space and Hazard Area	26.71	1.1%
Public Semi-Public	39.35	1.6%
Residential/Open Space	6.04	0.2%
Grand Total	2,465.38	100.00%

The Comprehensive Plan designations that allow residential development are: Urban Low Density Residential, Urban Medium Density Residential, Urban High density Residential and Residential Open space. Gross vacant acres within these designations total 1,841.34 acres, 74% of all unimproved, qualified acres.

Approximately 10.57 acres of city, county, state and tribal lands that are subject to a residential Designation totals have been added to this total. Another 16.77 acres of low-density residential lands have been added as well. **The total gross vacant acres of residential land is 1,868.68 acres.**

Constrained Land

Development of constrained land could affect the building cost, density, or other site-specific development factors. State policy gives jurisdictions the right to decide what is unbuildable based on local development policies. The following section describes how constraints were handled in the Buildable Lands Inventory:

Unbuildable Constrained Land

Physical constraints such as steep slopes, wetlands, riparian setbacks and floodway areas must be accounted for in determining whether land is realistically available for future development. For the purposes of this analysis some physical constraints rendered portions of parcels unbuildable, and those portions were subtracted from the inventory.

- **Floodway:** Acres within the floodway portion of the 100-year floodplain mapped by the Federal Emergency Management Agency (FEMA) were **removed** from the Inventory. The City has a "no-rise" requirement in this area.
- **Riparian Habitat Setback Areas:** The City and County both require a protective setback be maintained on properties that contain or abut portions of the following watercourses and the area was removed from the inventory:

REQUIRED RIPARIAN HABITAT SETBACKS

WATERCOURSE	RESIDENTIAL ZONES	COMMERCIAL AND INDUSTRIAL ZONES
South Umpqua River	50 feet	50 feet
Newton Creek	25 feet City/50 feet County	50 feet
Deer Creek	25 feet City/50 feet County	50 feet
North Umpqua River	50 feet	50 feet

Acres of constrained/unbuildable land include the total acres of all residential land containing any of the constraints identified above. An area can include a single constraint or a combination of many constraints overlapping.

Table 4 shows the amount of acreage affected by the identified constraints and the gross buildable acres by Plan Designation. Approximately 43 acres are considered unbuildable and of the 43 acres, 14 were designated for residential development (LDR, MDR, HDR and ROS). Table 5 shows the net result.

Table 4: Unbuildable Acres by Plan Designation

COMP PLAN DESIGNATION	ACRES
Commercial	0.18
High Density Residential	1.1
Industrial	1.3
Low Density Residential	11.66
Medium Density Residential	1.59
Professional Office	1.22
Parks/Open Space and Hazard Area	25.14
Public Semi-Public	0.52
Residential/Open Space	0
Total	42.71

Table 5: Gross Buildable Acres by Residential Plan Designation

COMP PLAN DESIGNATION	Unimproved	Unbuildable	Total Acres
Low Density Residential	1608.31	11.66	1596.7
Medium Density Residential	164.26	1.59	162.7
High Density Residential	90.07	1.1	89.0
Residential/Open Space	6.04		6.0
Grand Total	1,868.68	14.35	1,854.3

Buildable Constrained Lands

There are several acres identified with constraints but were not excluded from the inventory as unbuildable. The following describes how these constraints were handled in the Buildable Lands Inventory:

- **Flood Fringe:** Acres within the flood fringe portion of the 100-year floodplain were **not removed** from the inventory and are considered developable land since the City allows residential development if certain floodproofing standards are met.
- **Slopes:** Sloped land was not removed from the inventory. However, hillside density projections, found in the City's Comprehensive Plan¹, were used on sloped areas of Low-density Residential designation to determine a buildable projection.

Land with 12-25% slopes = 70 percent of normal densities
 Land with >25% slopes = 40 percent of normal densities

This does not represent hillside development regulations; to the contrary, the City encourages greater densities and lot clustering on hillsides in order to achieve the full zoning potential. However, history has shown that the terrain, not the zoning, is the limiting factor. For example, the Warewood developments² in northwest Roseburg are on hillsides and are zoned at a greater density than four dwelling units per acre (the constant density assumed in the Comprehensive Plan hillside study), but they could not achieve more than the 50 percent of the zoning potential³. Using the standards of the Comprehensive Plan study (4 du/ac), Warewood reached 65 percent its potential, a number consistent with the study's findings.

Tables 6 and 7 show shows the amount of gross buildable acres; Table 7 shows adjusted buildable acres (LDR only) based on the hillside density projections.

Table 6: Gross Buildable Acres By Plan Designation and Slope

Comp Plan Designation	0-12%	12-25%	>25%	Total
Low Density Residential	29.79	529.87	1036.96	1,596.62
Medium Density Residential	50.35	48.02	64.31	162.68
High Density Residential	17.71	21.2	50.03	88.94
Residential/Open Space	0.6	1.94	3.51	6.05
Grand Total	98.45	601.03	1154.81	1,854.3

¹ Roseburg Urban Area Comprehensive Plan, p. 579: "The average density [for hillside development] is weighted by a slope factor. For example: the constant density for "Low Density Residential" is four dwellings per gross acre. On slopes 0-12% no weighted slope factor is used, since slopes of less than 12% have little impact upon density. In areas with slopes of predominantly 13-25%, a weighted factor of 70 percent is used. This is because, on the average, areas with slopes of 13-25% were found to accommodate only about 70 percent of the number of dwellings per gross acre as areas with slopes under 13 percent. In other words, it would take 130 acres of land having predominantly 13-25% slopes to accommodate the same number of dwellings as 100 acres on slopes under 13 percent. On slopes in excess of 25% the weighted factor increases dramatically to 40 percent. That is, it takes two and one-half times more land to accommodate the same number of dwellings as can be accommodated on land with slopes of 0-12%."
² Warewood Estates PUD, Warewood Valley, Warewood Valley 1st Addition, Warewood Valley 2nd Addition, Warewood Valley 3rd Addition, Warewood Valley 4th Addition, Warewood PCD Phase 1, The Point in Warewood
³ 146 units on 51.5 acres in a zone with a 7,500 square-foot minimum lot size

Table 7: Hillside Constrained Buildable Acres By Plan Designation and Slope

Comp Plan Designation	0-12%	12-25%	>25%	Total
Low Density Residential	29.79	370.91	414.78	815.48
Medium Density Residential	50.35	48.02	64.31	162.7
High Density Residential	17.71	21.2	50.03	88.9
Residential/Open Space	0.6	1.94	3.51	6.1
Grand Total	98.45	442.07	532.63	1,073.15

Redevelopment and Infill

Redevelopable Residential Lands Analysis

Some demand for new residential development will be met by redevelopment and infill. Redevelopment refers to land already zoned or designated for residential use on which development has occurred, but there is a strong likelihood that existing development will be converted to more intensive residential use.

The work performed for redevelopment analysis was based upon the Douglas County Assessor tax account records related to tax lots within the City of Roseburg Urban Growth Boundary. The account field "County Property Class" was the primary basis for deriving its results.

For the purposes of this study, "redevelopable" residential tax lots were defined as:

Real ("R") property tax lots that were classified as "improved" residential by County Property Class Code where the appraised value of the improvements were less than or equal to 30 percent of the total combined real market value of the land and appraised value of the improvements. All accounts designated for residential development are included as redevelopable acres.

Arriving at a realistic value for developed residential properties is complicated by the fact that manufactured homes are generally considered personal, rather than real property improvements, by the Assessor, and are assigned separate "M" code accounts. In order to gain a more accurate value for existing property improvements on tax lots, a list of manufactured home accounts was compared and matched to residentially coded improved real property accounts that initially appeared to qualify as "redevelopable" under the improvement/total value of less than 30 percent criterion.

In order to simplify this task, the master list of all manufactured home accounts was modified to separate accounts located in mobile home parks from all other types. The remaining "M" accounts were then compared to the initial list of redevelopable real property accounts and matched by the account Map and Tax Lot Numbers. Where "M" accounts shared an identical map and tax lot number with an associated "R" real property account, the appraised value of the manufactured home (i.e., the "improvement") was added to the total improvement value for the associated "R" real property account.

The unmatched "M" accounts were then discarded after an experimental sampling showed that all accounts tested were related to real property accounts that already exceeded the improvement-to-total value threshold.

Table 8 shows the results of the analysis for potentially redevelopable residential land within the UGB. The results are distributed by Plan Designation. The analysis show a total of **360 acres have the potential for redevelopment**, mostly land designated Low Density Residential.

**Table 8: Gross Redevelopable Acres
By Plan Designation**

COMP PLAN DESIGNATION	Total
Low Density Residential	173.0
Medium Density Residential	112.7
High Density Residential	28.0
Residential/Open Space	46.4
Total	360.1

Infill or Partially Vacant Residential Land

Infill development in this case refers to single-family infill that occurs primarily through the partitioning process. Infill was calculated for all developed parcels zoned residential. If a developed lot was greater than one half acre, then one quarter acre was subtracted from that lot's total acreage to determine its potential for infill. Infill calculations for parcels on sloped land were also subject to the Comprehensive Plan hillside densities. This calculation assumed 100% infill potential and yielded **166** available acres.

Land Supply Total

The following summarizes the land supply calculations:

Gross vacant residential:	1,868.7 acres
Environmental constraints:	(14.4) acres
Slope constraints:	(781.1) acres
Redevelopment:	360.1 acres
Infill:	166.0 acres
Total:	1,599.3 acres

HOUSING NEEDS

Demographic Trends

This section looks at the types of housing that has been developed in the City since 1990 to the end of 2005. It also looks at demographic and socioeconomic changes over the same time period to determine how housing, demographic and economic trends interact in the City.

Four basic sources of information were used to create a picture of recent City dynamics: US Census data from 1990 and 2000; US Department of Housing and Urban Development statistics for the years 1990 through 2005; City and County building permit information, and; County Assessor data. The data provide a description of recent housing trends in the City.

Population Trends

During the 1990s, the City population growth rate outpaced that for the County as a whole, but did not keep pace with the state average. The average annual rate of growth for the City was only outpaced by the cities of Sutherlin, Winston and Glendale during the 1990s, as shown in Table 11:

**Table 11: Population Changes in Douglas County and Oregon
1990 to 2000**

	April 1 Census Count	April 1 Census Count	Percent Change	Per Capita Change
	2000	1990		
Sutherlin	6,669	5,020	32.85%	1,649
Winston	4,613	3,773	22.26%	840
Glendale	855	707	20.93%	148
Roseburg	20,017	17,069	17.27%	2,948
Yoncalla	1,052	919	14.47%	133
Oakland	954	844	13.03%	110
Myrtle Creek	3,419	3,063	11.62%	356
Canyonville	1,293	1,219	6.07%	74
Uninc.	54,967	54,838	0.24%	129
Drain	1,021	1,086	-5.99%	-65
Reedsport	4,378	4,796	-8.72%	-418
Riddle	1,014	1,143	-11.29%	-129
Elkton	147	172	-14.53%	-25
DOUGLAS	100,399	94,649	6.08%	5,750
STATE	3,421,399	2,842,321	20.37%	579,078

However, the table also shows that in terms of absolute numbers, Roseburg gained by far the greatest number of new inhabitants, representing 2,948, or 51 percent, of the 5,750 additional Douglas County residents. Between 1980 and 2000, the percentage of total Douglas County population living in the City of Roseburg has continued to increase, as shown in Table 12:

Table 12: Roseburg as a Percentage of Total Douglas County Population

Year	City	County	Percent
1980	16,644	93,748	17.75%
1990	17,063	94,649	18.03%
2000	20,017	100,399	19.94%

A significant portion of the new City residents are likely persons from other parts of the County that moved to the City to be closer to their place of employment, and elderly persons wanting to be closer to medical and other services. The 2000 Census indicates that 33% of City residents living in a different house in 1995 came from Douglas County, while 19.7% came from some other county. There were nearly twice as many newcomers from other states as from Oregon (2,344 versus 1,348), many of whom were likely retirees forming part of the rapidly growing cohort of City residents over 65 years old.

According to the US Census, between 1980 and 2000 the City population grew from 16,644 to 20,017, exhibiting a twenty-year average annual growth rate of 1% per year. This rate accelerated to about 1.75% from 1990 to 2000. The increase probably reflects improvement and stabilization of the local economy during the 1990s after traumatic changes in the local timber industry during the previous decade, but other factors also likely played a role in the increased population growth rate, such as the expanding professional, retail and service sectors and the growing retiree population.

Population Projections

Oregon Revised Statute 195.036 requires counties to establish and maintain “a population forecast for the entire area within its boundary for use in maintaining and updating comprehensive plans.” Douglas County produced population analyses for the county and its cities in 1996. Recognizing that cities would absorb the greater share of growth over the years, the County estimates that city populations will become greater than the unincorporated portions of the County about the year 2009 and be about 30% greater by the year 2020. The city-county coordinated adopted growth rate for Roseburg is 2.5%. Table 13 presents a range of results for future City population projections at various average annual growth rates for the next twenty years:

Table 13: UGB Population Growth Projections

Annual Growth Rate	2000 Population	2027 Population
	25,490	
1.50%		38,102
1.75%		40,719
2%		43,509
2.25%		46,481
2.50%		49,649
Base: 2000 U.S. Census, Roseburg, 20,017, and CDP, 5,473 (2.5% AAGR)		

Population Age Groups

Like the rest of Oregon and the nation in general, the City population figures indicate a greater proportion of its residents are in older age groups. This is particularly true of the cohort for persons over 65, whose numbers grew by 25% during the 1990s and composed about 19% of the total year 2000 City population. This figure is more than six percentage points greater than the state average. Moreover, this cohort grew at a rate more than twice that of the state during the decade. The 20 to 44 age group for the City is about three percentage points lower than the same state group. Otherwise, the percentages for the City cohorts are very similar to those of the state.

Table 14 compares age groups of the City, County and state in 1990 and 2000 based on Census data. All three areas show declines in the relative proportions of persons 44 or younger and relative increases in persons older than 44. Both the City and state show positive growth in all age groups, while Douglas County shows negative growth for the two youngest cohorts.

Table 14: Changed in Age Groups 1990 – 2000

AGE - CITY					
	1990	Percent	2000	Percent	Percent Change
TOTAL	17,032		20,017		17.5%
Under 18	4,284	25.2%	4,650	23.2%	8.5%
20 to 44	5,943	34.9%	6,519	32.6%	9.69%
45 to 64	3,152	18.5%	4,475	22.4%	42.0%
Over 65	3,024	17.8%	3,787	18.9%	25.2%
AGE - COUNTY					
	1990	Percent	2000	Percent	Percent Change
TOTAL	94,649		100,399		6.1%
Under 18	25,460	26.9%	24,079	24%	-5.4%
20 to 44	31,231	33.0%	29,292	29.2%	-6.2%
45 to 64	19,924	21.1%	26,555	26.4%	33.3%
Over 65	14,563	15.4%	17,888	17.8%	22.8%
AGE - STATE					
	1990	Percent	2000	Percent	Percent Change
TOTAL	2,842,321		3,421,399		20.4%
Under 18	724,130	25.5%	846,526	24.7%	16.9%
20 to 44	1,074,596	37.8%	1,227,675	35.9%	14.2%
45 to 64	532,944	18.8%	811,543	23.7%	52.3%
Over 65	391,324	13.8%	438,177	12.8%	12.0%

The relative decrease in Douglas County persons aged 20-44 (-6.2%), compared to the positive relative increase for the same City age group (9.69%) lends support to the assumption that Roseburg is attracting young working age persons from other parts of the County. Percentages for City and County persons under 18 may also indicate support of this notion, since the 20 to 44 age group includes large numbers of people in families with children. Again the County shows a relative decrease (-5.4%), while the City shows a relative increase (8.5%) for non-adult

populations. The working-age group of persons 45 to 64 also shows a greater percent change for the City than the County. This tends to support the notion of Roseburg as a regional employment center attracting working-age persons and families, particularly from the surrounding areas of the County. However, the *regional*, or County-related aspect of this assumption needs to be noted, as both the under 18 and the 20-44 year age groups dropped about two percentage points as percentages of total population. This may indicate that while the City is adding working age families with children, the City and region cannot meet overall employment needs for this cohort and some of them are leaving the area entirely in search of brighter prospects and better opportunities. Household trends and characteristics also seem to support this notion, as shown in the following section.

Household Demographics

Roseburg is following the national, state and county trend in producing a smaller average number of persons per family. This national trend is usually related to the general overall aging of the population, families generally having fewer children, and increasing numbers of single, divorced and widowed persons, along with single-parent families, particularly women with children. The changes registered in the US Census for the City and County between 1990 and 2000 are much greater than that for the state, as shown in Table 15:

Table 15: Changes in Average Number of Persons Per Household

	1990	2000	Percent Change
City	2.4	2.32	-3.33%
County	2.6	2.48	-4.62%
State	2.52	2.51	-0.40%

This corresponds with the relatively greater percentages of older persons in the City and County, particularly the greater proportions of persons aged 65 or older, who comprise a large number of the householders living alone. In the City, changes in the numbers of household types during the 1990s indicate that every category of household associated with smaller numbers of persons increased at much greater rate than married couples, as shown in Table 16:

Table 16: Changes in Household Composition

Household Type	1990	2000	Percent Change
Total Households	6750	8237	22.03%
Married couple families	3483	3807	9.30%
Male householder family	192	na	na
Female householder family	742	977	31.67%
Nonfamily households	2333	3140	34.59%
Living alone	1965	2604	32.52%
65 or older	897	1145	27.65%

Both sets of data indicate that the number of married couple families increased at a much lower rate than total households, and proportionately decreased as a percentage of total households below 50%. Non-family households, persons living alone, female householder families and householders 65 or older all outpaced the overall rate of growth for total households. Again, these figures lend support to the assumption that Roseburg is attracting relatively large proportions of working age persons and the elderly, people looking for opportunities, amenities and services. A comparison of selected household types and their relative percentages for Roseburg, Douglas County and the state indicate that the City contains relatively high percentages of non-traditional households and elderly persons, and a lower proportion of married couple families, as shown in Tables 17 and 18:

Table 17: Household Types as a Percentage of Total

	1990	2000	Percent change
Married couple families	51.60%	46.22%	-5.38%
Male householder family	2.84%	na	na
Female householder family	10.99%	11.86%	0.87%
Nonfamily households	34.56%	38.12%	3.56%
Living alone	29.11%	31.61%	2.50%
65 or older	13.29%	13.90%	0.61%

Table 18: Comparison of Percentage of Household Types -2000 Census

Household Type	City	County	State
Married Couple Families	46.2	57.2	51.9
Female Householder	11.9	9.6	9.8
Nonfamily Households	38.1	29.1	34.2
Living Alone	31.6	23.9	26.1
65 or Older	13.9	11	9.1

It is interesting to note that the household composition of Roseburg exhibits similar percentages to other regional center/county seat cities in Oregon of roughly similar populations with large populous surrounding unincorporated areas, as shown in Table 19:

Table 19: Oregon County Seat Cities Household Type Comparison

Household Type	Roseburg	Grants Pass	Klamath Falls
Married couple families	46.2	44.5	42.2
Female householder family	11.9	14.5	11.7
Nonfamily households	38.1	36.8	41
Living alone	31.6	31.2	32.4
65 or older	13.9	16	11.9

HOUSING TYPES

The Oregon Statewide Planning Goal 10: Housing requires cities to “encourage the availability of adequate numbers of needed housing units at price ranges and rent levels which are commensurate with the financial capabilities of Oregon households and allow for flexibility of housing location, type and density.”

The practical requirements, regulations, standards and directives implementing Goal 10 are described in Oregon Administrative Rules (OAR). OAR Chapter 660, Division 8, Interpretation of Goal 10 Housing. OAR 660-008-0010 requires that “sufficient buildable land shall be designated on the comprehensive plan map to satisfy housing needs by type and density range as determined in the housing needs projection.”

This Goal 10 policies and objectives are statutory. Oregon Revised Statutes (ORS) 197.296(3)(b) Requires cities to: “Conduct an analysis of housing need by type and density range...to determine the number of units and amount of land needed for each needed housing type for the next 20 years.”

Housing Growth: 1990 - 2005

Like the changes in population, the numbers of dwelling units in the City have increased continuously over the past decades. In terms of percentage growth, the number of units has grown at a proportionally greater rate than the population. Census figures indicate that between 1990 and 2000 the population grew by about 17.5 %, while the total number of dwelling units grew by about 25.3%. This disparity reflects changes in the number and types of households and the decline in average persons per household. As the average number of persons per household and married couple families decline, the need for proportionately more housing units per person increases. Increases in single persons, young adults and the elderly create greater demand for affordable living quarters, a large percentage of which is supplied by multiple-family rental housing. Much of the housing data collected for this study reflect these assumptions.

The total number of housing units in Douglas County increased by about 4,986 units, or 13%, during the 1990s, while the City inventory grew by some 1,786 units, or 25%. The percentage of total housing units in Douglas County now supplied by the City increased from 18.41% to 20.42% by 1999, showing similar but proportionally greater housing growth as compared to per capita growth.

The types of housing within jurisdictions are generally classified and counted during each decennial US Census. This data provides a general idea of the types of housing in the area and, through comparison, what if any changes in the mixture of types has occurred between decades. Data for the City of Roseburg from 1990 and 2000 and the percent change of housing types is shown in Table 20:

Table 20: Changes in Housing Type 1990-2000

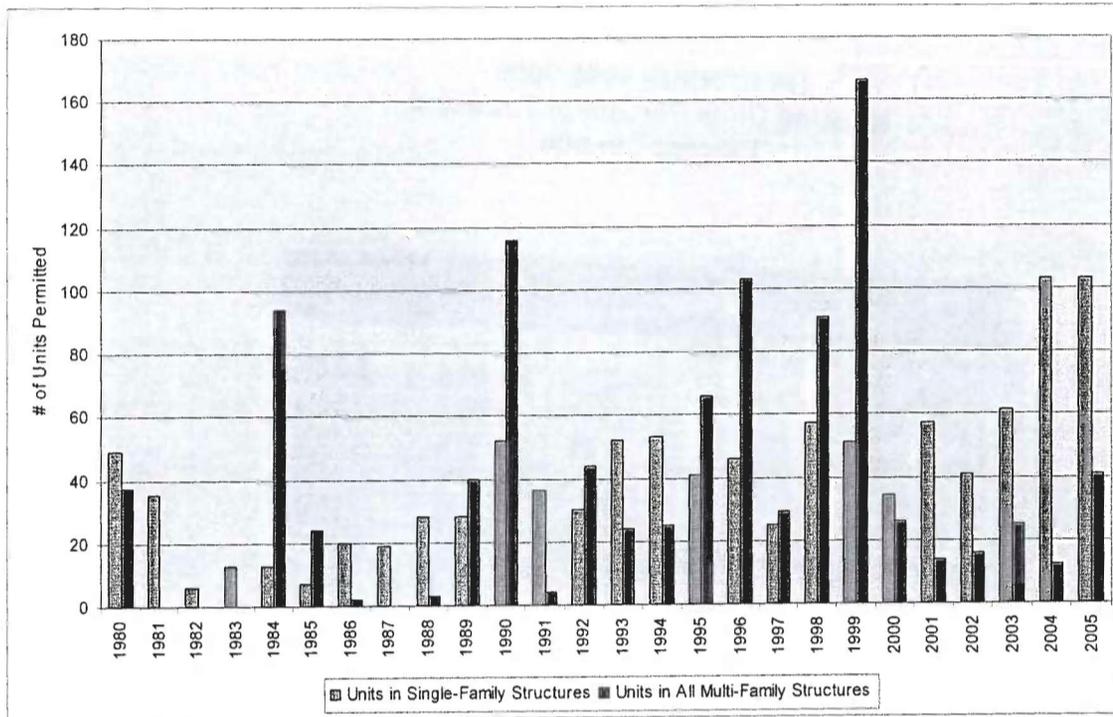
	1990	2000	Percent Change	Number of additional units
1 unit detached	4,599	5,493	19.44%	894
1 unit attached	223	325	45.74%	102
2 to 4 units	759	1,052	38.60%	293
5 to 9 units	307	359	16.94%	52
10 or more units	710	1,037	46.06%	327
Mobile home, trailer, other	454	602	32.60%	148
TOTAL UNITS	7,052	8,868	25.75%	1,816

The changes in housing types shown in Table 20 indicate that while single-family detached dwellings were by far the greatest number of new units added, the relative increases in multiple-family dwelling units were all greater than the single-family increase. A significant upswing in duplex and apartment construction occurred over the decade, indicating that the housing industry is responding to changing demographic and household trends. The total number of multiple-family units in buildings with two or more units created during the decade equals 774, compared to a total of 894 new single-family dwellings. Excluding mobile homes, trailers, etc., the percentage of new units constructed as single-family homes equals about 53.6%, and buildings containing two or more units are about 46.4%.

Building permit data was gathered from HUD's State of the Cities Data Sets. Table 21 shows building permit activity from 1980 to 2005 and years in between. Since 1980 51% of all units permitted were single family dwellings and 49% were multi-family units. In the last five years however, single family units equaled 75% of all structures permitted. The HUD totals running through the year 2005 seem to indicate that the overall proportionate mix of single-family units has increased significantly between 2000 and 2005. Permitted multi-family units fluctuate drastically from year to year as shown in the graph below, however, the long term view of residential permits show the proportion of single and multi-family units has remained relatively constant.

**Table 21: Number of Residential Building Permits
Percent of Total 1980-2005**

Dwelling Unit Types	1980-2005		1990-2005		2000-2005	
	Number	Percent	Number	Percent	Number	Percent
Units in Single-Family Structures	1060	51%	842	51%	399	75%
Units in All Multi-Family Structures	1002	49%	802	49%	134	25%
Units in 2-unit Multi-Family Structures	126	6%	124	8%	44	8%
Units in 3- and 4-unit Multi-Family Structures	256	12%	222	14%	47	9%
Units in 5+ Unit Multi-Family Structures	620	30%	456	28%	43	8%
Total Units	2062	100%	1644	100%	533	100%



The U.S. Census shows the changes by housing types between 1990 and 2000 as to their respective relative percentage of the total housing stock, and indicates that the mix of housing types has remained relatively constant over the decade:

**US CENSUS 1990-2000
Housing Units Percent of Total and
Percent Change**

Units in structure	1990	2000	Percent Change
1 unit attached, detached, mobile home	65.22%	61.94%	-3.27%
1 unit attached	3.16%	3.66%	0.50%
2 to 4 units	10.76%	11.86%	1.10%
5 to 9 units	4.35%	4.05%	-0.31%
10 or more units	10.07%	11.69%	1.63%
Mobile home, trailer, other	6.44%	6.79%	0.35%

A comparison of 2000 to 2005 is also included below. The standards for data collection by the Census Bureau changed during this time in which categories are more compacted.

Units in structure	2000	2005	Percent Change
1 unit attached, detached, mobile home	68.73%	65.60%	-3.13%
2 to 4 units	11.86%	19.56%	7.70%
5 or more units	15.74%	3.62%	-12.12%

FUTURE HOUSING DEMAND

This section analyzes Roseburg's housing needs by type and density to provide the information needed to determine the amount of land needed for each housing type for the next 20 years. The housing needs analysis is a complex task. The complexity of determining housing needs comes from consideration of past trends, projecting these trends into the future, and then trying to predict housing needs for Roseburg's future population. The following four steps outline the process:

- Project the number of new housing units needed in the next 20 years
- Project the housing mix in the next twenty years
- Estimate the number of additional housing units needed by type
- Estimate the expected net density

Future Population

In order to begin to understand what sort of housing will be needed to accommodate future population growth, one starting point is to calculate the total expected number of additional persons based upon an average annual rate of growth. The County's coordinated population figures (ORS 195.036) show a projection of a 2.5% annual average growth rate for Roseburg.

Table 22: Projected Population

Annual Growth Rate	2000 Population	2027 Population
	25,490	
1.50%		38,102
1.75%		40,719
2%		43,509
2.25%		46,481
2.50%		49,649
Base: 2000 U.S. Census, Roseburg, 20,017, and CDP, 5,473 (2.5% AAGR)		

Total Households

To determine the number of households requiring individual housing in 2027, the number of persons in group quarter facilities and a projected average person per household must be determined.

Group Quarters

Group quarters include facilities such as assisted living facilities, dormitories, correctional institutions, group homes, boarding houses, military facilities, juvenile institutions, and psychiatric hospitals. The 2000 Census indicates 4.6% (2,034) of the population resided in group quarter facilities. For future years the percentage of the population in group quarter facilities is projected to stay the same.

Average Household Size

Average City household size dropped 3.4% during the decade and was 2.32 in 2000. The average household size is expected to continue to decrease to 2.25 in 2027 if the trend between 1990 and 2000 continues.

Vacancy Rate

Based on the 2000 Census, a vacancy rate of seven percent for owner and renter-occupied units is assumed.

To arrive at a projected number of households and housing units, the group quarters population is first subtracted from the projected population to yield the population living in households. This number is then divided by the average household size to compute the number of households.

The vacancy rate is applied to arrive at a total number of units needed over the time period and the existing number of dwelling units is subtracted to arrive and the total number of future needed housing units. The total number of new housing units needed in 2027 is 22,636.

Existing Number of Dwelling Units

The existing number of dwelling units as of December 1, 2005 was arrived at by summarizing building permit activity from 2000-2005. Building permits issued between 2001 and 2005 were added to the total number of units tabulated from the 2000 census.

Table 23: Total Dwelling Units as of 2005

2005 Housing Units	2000 Census	Issued Permits 2001-2005	TOTAL Number of Dwelling Units
Single Family	5,493	365	5,858
Duplex	793	42	835
Multi-family	1980	66	2,046
Mobile Home	547		547
Total	8813	473	9,286

Source: SOCDs, US Census

Table 24 below shows the methodology for calculating Needed Housing Units for the year 2027.

Table 24: Projected Number of Needed Housing Units

Methodology	Total
2027 Coordinated Population Projection	49,649
Group Quarter Population (4.6%)	2,283.85
Population in Households	47,365.15
Total Occupied Housing Units 2027 Average Household Size (2.25)	21051.18
Total Housing Unit 2027 w/Occupancy Rate (93%)	22,635.67
December 2005 Number of Dwelling Units	9,286
2007-2027 Future Needed Housing Units	13,349.67

Housing Types

The second step in gleaning a basic idea of what may be required to meet future housing needs is to make some determinations about the types of housing units to be added. A basic approach to determining what this mix might be in the future is to simply project the current percentage mix of housing types forward and hold them constant. For this analysis the 2027 housing mix is expected to be similar to the mix based on building permit activity from 1980-2005.

Table 25 : Existing Housing Mix

2027 Estimated Housing Mix	Units	Percent
Single Family	6808.33	51%
Duplex	800.98	6%
Multi-family	4939.38	37%
Mobile Home	800.98	6%
Total	13,349.67	100%

However, the general household size is experiencing a downward trend. A five percent adjustment from single-family to multi-family should assist in addressing the disconnect between decreasing household size and a relative trend increase in single-family dwellings. Table 26 displays the change:

Table 26 : Projected Housing Mix

2027 Estimated Housing Mix	Units	Percent
Single Family	6140.85	46%
Duplex	800.98	6%
Multi-family	5606.86	42%
Mobile Home	800.98	6%
Total	13,349.67	100%

Residential Land Needs by Dwelling Unit Type and Plan Designation

Roseburg planning staff reviewed building permit and land use data to determine densities for future residential development by structure type.

Single-Family

For single-family housing, one basic method is to determine the *average lot size* for recent developments based upon building permit records. Calculating the average lot size used for this initial example was accomplished by totaling the lot size for all single-family residential building permits issued since 1996. The average lot size for this set of data is 0.318 acres, or 13,901 square feet or a density of 3.14 units per acre. This number is relatively low for urban planning purposes, so an increased density of 4.0 will be assumed for single-family dwellings.

Duplex Units

Planning staff reviewed permit data for the past 10 years to determine density for duplex units. Duplexes are expected to develop at 6.44 dwelling units per acre.

Multi-Family Units

Based on permit data and county assessor records, the average density of all multi-family units (tri, four-plex and 5+ units) is 13.80 dwelling units per acre.

Mobile Homes

US Census data show that approximately 6.79% of the City housing stock is categorized as “mobile home, trailer, etc.” This figure represents the units of this type located in mobile home parks. Manufactured homes on individual lots are assumed to be included in the “single-family detached” housing type. Units in mobile home parks therefore need to be accounted for somehow. The method of determining mobile home park density employed for this initial calculation is based upon an analysis of the mobile home parks located within the UGB. The number of units in each park and the park acreages were determined from the County Assessor records. The total number of acres in mobile home parks and the number of mobile home accounts were used to determine density per acre. Total acres divided by the total number of unit accounts yielded a density of 8.3 mobile homes per park acre, or an average land use of 5,248 square feet (0.12 acres) per unit.

This estimate is probably more accurate for expected density per unit than for total numbers. The City Census figures indicate that there were some 547 mobile homes in the year 1999, while Tax Assessor accounts for the entire UGB area indicate there are a total of 1,009 mobile home accounts in mobile home parks. This indicates that nearly half of the mobile homes in parks within the UGB are located outside the City Limits. Unfortunately, no method of determining the number of recent mobile home placements, particularly the numbers locating in mobile home parks has been identified that includes the entire UGB area.

Land for Non-Residential Purposes

If it is assumed that new streets would be required for the vast majority of this sort of new development, the gross acres should be increased by adding results from using a selected multiplier to arrive at a total net acre estimate. It is assumed 25% of total gross acres will be needed for non-residential uses. Based on these calculations, the resulting Table 27 presents the estimated land needs for the planning period:

Table 27: Estimated Land Needed for Future Residential Development

2027 Estimated Housing Mix	2027 Housing Units	Density (units/ac)	Acres Needed	Public Facilities (25%)	Net Acres Needed
Single Family	6140.85	4.00	1535.21	383.80	1919.02
Duplex	800.98	6.44	124.38	31.09	155.47
Multi-family	5606.86	15.98	350.87	87.72	438.58
Mobile Home	800.98	8.30	96.50	24.13	120.63
Total	13349.67		2106.96	526.74	2634

SUPPLY AND DEMAND COMPARISON

The buildable lands supply has been estimated, as well as the projected need for housing. As shown in the Future Housing Needs section, there is a need for 13,349.67 housing units and a total of **2,634** acres in the year 2027. The majority of the needed units are for single family detached units at 6,140.85 as well as multi-family units at 5,606.86.

The analysis shows there are approximately **1,599** acres available for residential development until the year 2027, yielding a **deficit of 1,035 acres**.

Appendix A

Douglas County Property Class Codes

COUNTY		STATE
Property Class	County Property Class Code Description	Property Class
001	MISC. RESIDENTIAL - UNBUILDABLE	010
001S	MISC. RESIDENTIAL - UNBUILDABLE (STF)	010
002	MISC. COMMERCIAL - UNBUILDABLE	020
002S	MISC. COMMERCIAL - UNBUILDABLE (STF)	020
004	MISC. COMMERCIAL - IMPS ONLY	021
005	MISC. RESIDENTIAL - IMPS ONLY	011
011	MISC. RESIDENTIAL - UNBUILDABLE - WATER INFLUENCE	010
012	MISC. COMMERCIAL - UNBUILDABLE - WATER INFLUENCE	020
020	MISC. COMMERCIAL - UNBUILDABLE - CONTAMINATED	020
074	MISC. INDUSTRIAL STATE RESPONSIBILITY - IMPS ONLY	303
100	RESIDENTIAL - VACANT	100
100S	RESIDENTIAL - VACANT (STF)	100
101	RESIDENTIAL - IMPROVED	101
101R	GOV RESTRICTED HOUSING	781
101S	RESIDENTIAL - IMPROVED (STF)	101
107	RESIDENTIAL - VACANT - SEPTIC DENIED	100
108	RESIDENTIAL - HISTORIC PROPERTY	014
110	RESIDENTIAL - VACANT - WATER INFLUENCE	100
110S	RESIDENTIAL - VACANT - WATER INFLUENCE (STF)	100
111	RESIDENTIAL - IMPROVED - WATER INFLUENCE	101
111S	RESIDENTIAL - IMPROVED - WATER INFLUENCE (STF)	101
117	RESIDENTIAL - VACANT - SEPTIC DENIED - WATER INFL.	100
120	RESIDENTIAL - VACANT - WATER VIEW	100
121	RESIDENTIAL - IMPROVED - WATER VIEW	101
140	RESIDENTIAL - VACANT - DFL	640
140S	RESIDENTIAL - VACANT - DFL (STF)	640
141	RESIDENTIAL - IMPROVED - DFL	641
141S	RESIDENTIAL - IMPROVED - DFL (STF)	641
141W	RESIDENTIAL - IMPROVED - DFL (WILDLIFE HABITAT)	641
180	RESIDENTIAL - VACANT - SUBDIVIDABLE LAND	190
180S	RESIDENTIAL - VACANT - SUBDIVIDABLE LAND (STF)	190
181	RESIDENTIAL - IMPROVED - SUBDIVIDABLE LAND	191
181S	RESIDENTIAL - IMPROVED - SUBDIVIDABLE LAND (STF)	191
191	RESIDENTIAL - IMPROVED - RIPARIAN	101
200	COMMERCIAL - VACANT	200
200S	COMMERCIAL - VACANT (STF)	200
201	COMMERCIAL - IMPROVED	201
201S	COMMERCIAL - IMPROVED (STF)	201
202	COMMERCIAL - CONDOMINIUMS	202
208	COMMERCIAL - HISTORIC PROPERTY	024
210	COMMERCIAL - VACANT - WATER INFLUENCE	200
211	COMMERCIAL - IMPROVED - WATER INFLUENCE	201
240	COMMERCIAL - VACANT - DFL	640
240S	COMMERCIAL - VACANT - DFL (STF)	640
241	COMMERCIAL - IMPROVED - DFL	641
241S	COMMERCIAL - IMPROVED - DFL (STF)	641
280	COMMERCIAL - VACANT - SUBDIVIDABLE LAND	290
300	INDUSTRIAL - VACANT	300
301	INDUSTRIAL - IMPROVED	301
310	INDUSTRIAL - VACANT - WATER INFLUENCE	300
311	INDUSTRIAL - IMPROVED - WATER INFLUENCE	301
340	INDUSTRIAL - VACANT - DFL	640
341	INDUSTRIAL - IMPROVED - DFL	641
371	INDUSTRIAL - STATE RESPONSIBILITY	303

COUNTY		STATE
Property Class	County Property Class Code Description	Property Class
400	RURAL - VACANT	400
400S	RURAL - VACANT (STF)	400
401	RURAL - IMPROVED	401
401S	RURAL - IMPROVED (STF)	401
410	RURAL - VACANT - WATER INFLUENCE	400
411	RURAL - IMPROVED - WATER INFLUENCE	401
411S	RURAL - IMPROVED - WATER INFLUENCE (STF)	401
421	RURAL - IMPROVED - WATER VIEW	401
440	RURAL - VACANT - DFL	640
440S	RURAL - VACANT - DFL (STF)	640
441	RURAL - IMPROVED - DFL	641
441S	RURAL - IMPROVED - DFL (STF)	641
480	RURAL - VACANT - SUBDIVIDABLE LAND	490
480S	RURAL - VACANT - SUBDIVIDABLE LAND (STF)	490
481	RURAL - IMPROVED - SUBDIVIDABLE LAND	491
491	RURAL - IMPROVED - RIPARIAN	401
500	FARM - VACANT (FARM H&B USE)	500
500S	FARM - VACANT (FARM H&B USE) (STF)	500
501	FARM - IMPROVED (FARM H&B USE)	501
501S	FARM - IMPROVED (FARM H&B USE) (STF)	501
502	FARM - VACANT - EFU ZONE	550
502I	FARM - IMPROVED - EFU ZONE	551
502IS	FARM - IMPROVED - EFU ZONE (STF)	551
502IW	FARM - IMPROVED - EFU ZONE (WILDLIFE HABITAT)	551
502S	FARM - VACANT - EFU ZONE (STF)	550
502W	FARM - VACANT - EFU ZONE (WILDLIFE HABITAT)	550
503	FARM - VACANT - NON EFU ZONE	540
503I	FARM - IMPROVED - NON EFU ZONE	541
503IS	FARM - IMPROVED - NON EFU ZONE (STF)	541
503IW	FARM - IMPROVED - NON EFU ZONE (WILDLIFE HABITAT)	541
503S	FARM - VACANT - NON EFU ZONE (STF)	540
503W	FARM - VACANT - NON EFU ZONE (WILDLIFE HABITAT)	540
504	FARM - VACANT - EFU & NON EFU ZONE	580
504I	FARM - IMPROVED - EFU & NON-EFU	581
504IS	FARM - IMPROVED - EFU & NON-EFU (STF)	581
504IW	FARM - IMPROVED - EFU & NON EFU ZONE (WILDLIFE HABITAT)	581
504S	FARM - VACANT - EFU & NON EFU ZONE (STF)	580
504W	FARM - VACANT - EFU & NON EFU ZONE (WILDLIFE HABITAT)	580
508	FARM - HISTORIC PROPERTY	054
510	FARM - VACANT - WATER INFLUENCE	500
510S	FARM - VACANT - WATER INFLUENCE (STF)	500
511	FARM - IMPROVED - WATER INFLUENCE	501
512	FARM - VACANT - EFU - WATER INFLUENCE	550
512I	FARM - IMPROVED - EFU ZONE - WATER INFLUENCE	551
512IS	FARM - IMPROVED - EFU ZONE - WATER INFLUENCE (STF)	551
512S	FARM - VACANT - EFU - WATER INFLUENCE (STF)	550
513	FARM - VACANT - NON EFU - WATER INFLUENCE	540
513I	FARM - IMPROVED - NON EFU - WATER INFL	541
513IS	FARM - IMPROVED - NON EFU - WATER INFL (STF)	541
514	FARM - VACANT - EFU & NON EFU - WATER INFL	580
514I	FARM - IMPROVED - EFU NON-EFU - WATER INFLUENCE	581
514IS	FARM - IMPROVED - EFU NON-EFU - WATER INFL (STF)	581
540	FARM -VACANT - DFL	640
540S	FARM -VACANT - DFL (STF)	640

COUNTY		STATE
Property Class	County Property Class Code Description	Property Class
541	FARM - IMPROVED - DFL	641
541S	FARM - IMPROVED - DFL (STF)	641
542	FARM - VACANT - EFU ZONE - DFL	580
542I	FARM - IMPROVED - EFU ZONE - DFL	581
542IS	FARM - IMPROVED - EFU - DFL (STF)	581
542S	FARM - VACANT - EFU ZONE - DFL (STF)	580
543	FARM - VACANT - NON EFU -DFL	580
543I	FARM - IMPROVED - NON-EFU % DFL	581
543IS	FARM - IMPROVED - NON EFU - DFL (STF)	581
543S	FARM - VACANT - NON EFU - DFL (STF)	580
544	FARM - VACANT - EFU - NON EFU - DFL	580
544I	FARM - IMPROVED - EFU NON-EFU DFL	581
544IS	FARM - IMPROVED - EFU & NON EFU - DFL (STF)	581
544S	FARM - VACANT - EFU - NON EFU - DFL (STF)	580
572	FARM - IMPROVED - EFU ZONE - IND STATE RSPNSB	353
573	FARM - IMPROVED - NON EFU - IND STATE RESPONSIBILITY	343
574	FARM - IMPROVED - EFU&NON EFU - IND STATE RSPNS	383
580	FARM - VACANT - SUBDIVIDABLE LAND	580
582	FARM - VACANT - EFU - SUBDIVIDABLE	550
582I	FARM - IMPROVED - EFU ZONE - SUBDIVIDABLE LND	551
583	FARM - VACANT - NON EFU - SUDIVIDABLE	540
583I	FARM - IMPROVED - NON EFU - SUBDIVIDABLE	541
584	FARM - VACANT - EFU&NON EFU - SUBDIVIDABLE	580
584I	FARM - IMPROVED - EFU & NONEFU - SUBDIVIDABLE	581
592	FARM - VACANT - EFU -RIPARIAN	550
592I	FARM - IMPROVED - EFU ZONE - RIPARIAN	551
600	FOREST LAND - VACANT	600
600S	FOREST LAND - VACANT (STF)	600
601	FOREST LAND - IMPROVED	601
601S	FOREST LAND - IMPROVED - (STF)	601
610	FOREST LAND - VACANT - WATER INFLUENCE	600
611	FOREST LAND - IMPROVED - WATER INFLUENCE	601
611S	FOREST LAND - IMPROVED - WATER INFLUENCE (STF)	601
640	FOREST LAND - VACANT - DFL	640
640S	FOREST LAND - VACANT - DFL (STF)	640
641	FOREST LAND - IMPROVED - DFL	641
641S	FOREST LAND - IMPROVED - DFL (STF)	641
700	MULTI-FAMILY - VACANT	700
700S	MULTI-FAMILY - VACANT (STF)	700
701	MULTI-FAMILY - IMPROVED	701
701R	GOV RESTRICT MULTI	781
701S	MULTI-FAMILY - IMPROVED (STF)	701
702	MULTI-FAMILY - CONDOMINIUMS	102
705	MULTI-FAMILY - MOBILE HOME PARK	707
708	MULTI-FAMILY - HISTORIC PROPERTY	074
711	MULTI-FAMILY - IMPROVED - WATER INFLUENCE	701
712	MULTI-FAMILY - CONDOMINIUMS - WATER INFLUENCE	102
715	MULTI-FAMILY - MH PARK - WATER INFLUENCE	707
745	MULTI-FAMILY - MOBILE HOME PARK - DFL	641
800	RECREATIONAL - VACANT	800
800S	RECREATIONAL - VACANT (STF)	800
801	RECREATIONAL - IMPROVED	801
810	RECREATIONAL - VACANT - WATER INFLUENCE	800
810S	RECREATIONAL - VACANT - WATER INFLUENCE (STF)	800

COUNTY		STATE
Property Class	County Property Class Code Description	Property Class
811	RECREATIONAL - IMPROVED - WATER INFLUENCE	801
811S	RECREATIONAL - IMPROVED - WATER INFLUENCE (STF)	801
840	RECREATIONAL - VACANT - DFL	640
841	RECREATIONAL - IMPROVED - DFL	641
860	RECREATIONAL - VACANT - OPEN SPACE	025
861	RECREATIONAL - IMPROVED - OPEN SPACE	025
901	X-HOUSING AUTHORITY	901
910	X-CHURCH VACANT LAND	910
911	X-CHURCH	911
911S	X-CHURCH (STF)	911
917	X-CHURCH SCHOOL (PRIVATE)	917
920	X-SCHOOL LAND VACANT	920
921	X-SCHOOL IMPROVED	921
927	X-DAY CARE/ ACADEMY	927
931	X-CEMETERY	931
940	X-CITY LAND VACANT	940
941	X-CITY IMPROVED	941
950	X-COUNTY LAND VACANT	950
951	X-COUNTY IMPROVED	951
960	X-STATE LAND VACANT	960
961	X-STATE IMPROVED	961
970	X-FEDERAL VACANT LAND	970
971	X-FEDERAL	971
980	X-DELETED ACCOUNT	980
981	X-CHARITABLE	981
982	X-FRATERNAL	982
985	X-LITERARY	985
986	X-SCIENTIFIC	986
987	X-LOW INCOME RENTAL HOUSING	987
991	X-MUNICIPAL DISTRICT	981
992	X-WATER ASSOCIATIONS/MISC DISTRICTS	992
993	VOLUNTEER FIRE	993
994	X-PUBLIC PARK	994
995	X-SENIOR CITIZEN CENTER	995
996	X-COMMON AREA	996
997	X-AMERICAN INDIAN PROPERTY	997
998	X-CENTRALLY ASSESSED UTILITIES	998
M095	M - 9FT WIDE, CLS 5	M095
M104	M - 10FT WIDE, CLS 4	M104
M105	M - 10FT WIDE, CLS 5	M105
M106	M - 10FT WIDE, CLS 6	M106
M115	M - 11FT WIDE, CLS 5	M115
M124	M - 12FT WIDE, CLS 4	M124
M125	M - 12FT WIDE, CLS 5	M125
M126	M - 12FT WIDE, CLS 6	M126
M127	M - 12FT WIDE, CLS 7	M127
M134	M - 13FT WIDE, CLS 4	M134
M135	M - 13FT WIDE, CLS 5	M135
M136	M - 13FT WIDE, CLS 6	M136
M144	M - 14FT WIDE, CLS 4	M144
M145	M - 14FT WIDE, CLS 5	M145
M146	M - 14FT WIDE, CLS 6	M146
M154	M - 15FT WIDE, CLS 4	M154
M155	M - 15FT WIDE, CLS 5	M155

DLCD CORRESPONDENCE SUMMARY ON BLI

DLCD letter #1: 11/20/2006. A review of the September Draft of the BLI
City of Roseburg response: 12/1/2006. A response to DLCD's 11/20 letter
DLCD letter #2: 2/7/2007. A response to the City's 12/1 letter

City Staff determined a second response to DLCD was not necessary.

DLCD
11/20/06:

In the second paragraph of the Introduction section [p. 1], it is stated that the supply analysis is based on buildable land information as of December 1, 2005. I looked at the submittal from URCOG, and it is dated November 2004. We believe this is the actual date of the information. This may make the submittal outdated for purposes of determining the future 20-year land need, depending on what steps the city and LCOG took to update URCOG's data.

City of Roseburg
12/1/06:

The supply analysis is based on buildable land information as of December 1, 2005.

DLCD
2/7/07:

No response.

DLCD
11/20/06:

Also in the second paragraph [p.1, amended], it is stated the housing need analysis forecasts housing need to 2025. However, the city is subject to ORS 197.296, which requires the forecast to be for 20 years from the date the BLI and housing need analysis is estimated to be adopted. Since it is already 2006, the forecast is out of date. The city will need to make adjustments to bring the forecasts up to date.

City of Roseburg
12/1/06:

Staff will make this correction. The September 2006 draft forecasts future needs to 2025. Planning Commission hearings on the BLI will take place in December. City Council adoption, Douglas County co-adoption, DLCD notification and other formal adoption processes will not be completed until next year, 2007. Staff will revise the projections to reflect a 20-year forecast from adoption (2027).

DCLD
2/7/07:

No response.

DLCD
11/20/06:

In the second paragraph of the Background section [p. 2] is the statement: "It also appears that most of the more level land within the UGA has been developed or is being held for needed commercial and industrial expansion, leaving housing developers in particular with limited opportunities on land that is more constrained and costly to develop." Development costs are not a permissible justification for a UGB expansion under Goal 14.

**City of Roseburg
12/1/06:**

Development costs were not used as a factor in determining the housing demand or land supply. This comment may have been inserted by the consultant to emphasize Roseburg's deficiency of level ground available for development, but it was not used to justify any calculable result.

DLCD
2/7/07:

No response.

DLCD
11/20/06:

The first paragraph [p. 4, amended] refers to Florence's UGB. There may be other places in the report where this typo has also occurred.

City of Roseburg
12/1/06:

Typographical errors have been corrected.

DLCD
2/7/07:

No response.

DLCD
11/20/06:

Second paragraph [p. 7, amended] – The city may not assume that city, county, state and tribal land are being held for future government uses. The city needs to consult the owners of these lands to determine their future plans. Tribal land in particular is often held for development. Should the tribe develop its land for housing or employment uses, these uses would be counted as supplying a city need.

**City of Roseburg
12/1/06:**

The entities mentioned constitute a significant portion of the land ownership in the UGB, but most of their lands are designated as public reserve, open space, commercial, or other non-residential uses. Upon re-inspection, staff found that of the 1,225 acres of land owned by government or tribe

within the UGB, 10.57 unconstrained acres were designated residential, or 0.86 percent of the total. It is possible the consultant excluded these lots assuming that a margin of error less than 1 percent was acceptable. Nevertheless, the 10.57 acres will be added to the supply.

DCLD
2/7/07:

No response.

DLCD
11/20/06:

Table 3 [p. 7] – Please explain what the “Residential/Open Space” designation means and how it is implemented.

City of Roseburg
12/1/06:

The Roseburg Land Use and Development Ordinance states:

The Residential Open Space District is intended to be applied to areas which have been identified as having significant scenic, cultural or economic value to the urban area, but which under controlled development conditions are also suitable for limited residential use. Planned Unit Development approval is required to ensure retention of the site's natural character and/or economic benefit to the community. (3.5.000)

Density requirement is an average one dwelling unit per three gross acres.

DCLD
2/7/07:

A density of one dwelling unit per three gross acres is too low of a density, even on constrained lands. This density does not achieve the efficient accommodation of urban uses as required by Goal 14. We suggest the city increase the density in this district, using a planned unit development process to cluster dwellings and to avoid areas of significant scenic, cultural or economic value to the urban area.

DLCD
11/20/06:

Wetlands [p. 7, amended] – Does the city have regulations protecting wetlands from development? If yes, the areas of Goal 5 wetland resources is correctly removed from the inventory. If no, these areas must be included in the BLI. Also, it is unclear to us

whether only the wetland portion of a parcel has been removed from the BLI, or whether the whole parcel containing the wetland has been removed. Only the protected wetland may be removed from the inventory.

**City of Roseburg
12/1/06:**

Three environmental constraints excluded land from the inventory: floodways, riparian areas, and wetlands. Most of the wetlands overlap with floodway or riparian areas. Areas affected by wetlands were counted after floodways and riparian setbacks were calculated; hence, of the 16 residential acres affected by environmental constraints, 2.45 acres were wetlands only. The total reflects the wetland portion of a parcel, not the remaining unaffected portion also.

The City does not have regulations protecting wetlands. The 2.45 acres will be added back into the inventory.

DLCD
2/7/07:

No response.

DLCD
11/20/06:

First paragraph [p. 8, amended] – As with wetlands on page 7, it is unclear whether the entire parcel containing Goal 5 riparian resource constraints has been removed from the BLI, or whether only the constrained portion of the parcel has been removed. Only the constrained portion may be removed from the inventory.

**City of Roseburg
12/1/06:**

Only the constrained portion was removed from the inventory. Staff will clarify this in the report.

DLCD
2/7/07:

No response.

DLCD
11/20/06:

Slopes [p. 9] – We recommend using best practices for buildable land analyses, and we believe that the method utilized – reducing minimum densities in the base zones using a formula – is not the best practice. For example, using Planned Unit Developments (PUDs) on sites with steep slopes allows clustering of the housing units at planned densities while protecting the environmentally sensitive portions of the site. On the other hand, applying a uniform lot size on steep terrain ignores the topography and is likely to result in development in environmentally fragile areas. There are

jurisdictions that require PUDs in certain areas. Some jurisdictions that allow, but don't require, PUDs, provide a density bonus for PUDs, allowing a higher number of units than the underlying zoning would generally produce, as an incentive for developers to use the PUD and protect natural resources. The city should reconsider its development procedures, criteria, and standards for developing sites with steep slopes.

In footnote #1 there is a reference to a density of four dwelling per gross acre for "Low Density Residential." This appears to be the density that the city is using to determine reduced densities for various slopes. Four dwelling per gross acre is not adequate to demonstrate efficient accommodation of urban land within the UGB as required by Goal 14, even on sloped land.

**City of Roseburg
12/1/06:**

In Roseburg, the PUD option is already in place and is popular with hillside development; indeed, on slopes greater than 25 percent a PUD is required. The City is processing a new hillside development ordinance that will be adopted shortly. Regardless of which method is used, both existing PUD provisions and the proposed Hillside Development Ordinance allow clustered development and include density bonuses. Despite these measures in place, the development pattern has never reached full zoning potential on Roseburg's hills. Most of the slopes are greater than 25 percent and cannot, in reality, accommodate the best efforts to cluster and reduce lots sizes to reach an overall urban density.

Four dwellings per acre for "Low Density Residential" is derived from the zone that is usually designated for hillsides and which has a 10,000 square foot minimum lot size (R-1-10). A density assumption of four dwellings per acre (43,560 sf) is appropriate for this zone. The results, as stated in the report and in the Comprehensive Plan, suggest that development on slopes between 12 to 25 percent (even with PUD incentives) achieves 70 percent of its potential, and development on slopes over 25 percent achieves 40 percent of its potential.

To ensure these results could be assumed for those few hillside developments that do not have the R-1-10 zone, staff conducted tests on the Warewood area in northwest Roseburg, a development on steep slopes with a zone that has a 7,500 square-foot minimum. Warewood also used clustering methods to maximize density. In this case—even with smaller underlying zone requirements—the development only reached

49 percent of the zoning potential. If it had the R-1-10 zone (4 dwellings per acre) as a base, it would have reached 65 percent, a number consistent with the study found in the Comprehensive Plan. In every case, zoning potentials were never reached despite all the density incentives available to developers.

Finally, the method used to determine buildable land on hillsides was taken from the state-acknowledged Roseburg Urban Area Comprehensive Plan, adopted in 1982 and updated in 1996.

DLCD
2/7/07:

The Hillside Development Ordinance should require clustered development not just allow it. The inclusion of a density bonus is a good feature. Why hasn't the actual development pattern reached the full zoning potential on Roseburg's hills?

It sounds like the city is allowing the development community to control the density of development. Rather the city should investigate why development is not achieving the full density potential and take action to ensure it does.

We believe the city should investigate why the planned densities cannot be achieved and make any necessary changes that will ensure the planned density is met.

DLCD
11/20/07:

Second Paragraph [p. 10, amended] – Lots within the UGB but outside city limits were included in the infill analysis using "minimum lot size per the County Zoning Code." This is not the correct methodology. The infill potential of these lots should be based on city zoning at urban densities.. Use of the county zoning densities under counts the infill potential for these properties and inflates the need for residential land outside the UGB.

Third Paragraph [p. 10, amended] – At city staff's request, LCOG removed 129 potential infill acres inside the UGB based on factors provided by staff, such as parking, lot configuration, access, landscaping, open space, development patterns, existing house location, location in the Winchester area, and frontage on the river. The land need analysis must show how these factors were applied to each parcel so that we can determine whether these lands were properly removed from the BLI. In addition, there is no explanation why lots in the Winchester area are excluded from infill

consideration (footnote 6). Also, existing house location is not a valid reason to exclude lots, because the city should not permit dwelling structures to straddle lot lines and occupy more than one subdivision lot (see footnote 3). Excluding all riverfront lots from potential infill is also not appropriate (see footnote 4). The fact that these lots are old and their owners want to protect their views does not justify excluding them. If a riverfront lot were partitioned, the owner could keep the riverfront view parcel for him or herself and sell the rear parcel or parcels. Finally, we do not see a justification to exclude narrow city lots from infill consideration (see footnote 5). Unless numerous flag lots have already been created within a particular block, "landlocked" rear infill parcels created from long, narrow lots can be accessed by an alley. Exclusion of the future development potential for a significant amount of land inside the UGB artificially inflates the need for land outside the UGB.

**City of Roseburg
12/1/06:**

Douglas County zoning: Infill lots subject to Douglas County zoning had minimum lot size requirements of 6,500 square feet (R1), 7,500 square feet (R2), and 15,000 square feet (RS). For the RS zone, double the infill potential was assumed, or 7,500 square feet per lot.

Winchester lots: As explained in the report, 21 subdivisions in the Winchester area were analyzed for infill possibilities. From 1951 to 2005 – the timeline for these developments – no replats had occurred that were the result of an additional dwelling. Staff found this to be a significant reality when compared to infill theory. Furthermore, this did not occur as a result of rural zoning; rather, the zoning potential in Winchester was and is at urban density levels (see previous response).

Riverfront lots: Staff disagrees with DLCD that development patterns on the riverfront are not justification to exclude the lots from the infill total. Like Winchester, these lots have experienced an obvious pattern. It would be an impractical reliance on these lots to assume they could accommodate the City's need for buildable land in a 20-year planning period when they have not changed in 50 years.

House location: It is not uncommon for landowners to buy adjacent parcels in order to increase the overall size of the ownership. In any case when a homesite is chosen such that setbacks would preclude division, it should not be considered for infill.

To simplify the infill question, however, staff will assume that any developed lot less than 0.5 acres is fully developed and that any developed lot 0.5 acres or greater is buildable after 0.25 acres are removed. The original infill total was 146 acres. The recalculated infill total using this method is 166 acres.

DLCD
2/7/07:

Even though the area has not experienced any redevelopment or replatting the city must still include this potential buildable land in its inventory. It would appear from the staff's comment that there is infill potential, but property owners just haven't elected to use it. That choice on the part of the property owners does not preclude the city from counting the infill potential for these lots. Is it possible that criteria for infill lots could be amended to encourage use of this land? This comment would also apply to the Riverfront lots mentioned below.

If the lots are legally authorized and meet zoning standards there should be no conflict with setbacks that would preclude a division unless the city has allowed dwelling construction over lot lines in conflict with the building codes.

[Staff's recalculation] is the safe harbor at OAR 660-024-0050(20). Does the city intend to apply it to the Winchester and Riverfront lots?

DLCD
11/20/06:

Last paragraph [p. 13, amended] – The next to last sentence should make clear that this is a calculated growth rate based on the county's adopted coordinated population forecast (unless it isn't).

City of Roseburg
12/1/06:

The calculated growth rate is based on the county's adopted coordinated population forecast. Staff will clarify this in the report.

DLCD
2/7/07:

No response.

DLCD
11/20/06:

Demographic trends of Roseburg's population versus changes in housing type [pp. 14-20] – The data indicates that while the average household size is going down, the proportion of permits for single family residences has been going up. Since smaller and

older households create a demand for smaller units and lots, such as attached townhouses on their own lots, condos, and apartments, the data suggest that Roseburg's housing market is addressing only part of its current and future Goal 10 housing needs.¹ What steps will the city take to change the current trend in order to comply with Goal 10 for the 20-year planning period? Roseburg should not rely on the recent historical trend in determining future housing needs.

City of Roseburg
12/1/06:

The City shares DLCD's concern. Many of Roseburg's higher density zones have been underdeveloped. Permits have been issued for detached single-family dwellings for lots that are zoned at greater densities. Steps the City is considering to address this problem are amendments to multi-family zoning codes such that single-family dwellings are prohibited or that the zones have greater density requirements. The City anticipates possible amendments soon after adoption of the buildable lands inventory and housing needs analysis.

DLCD
2/7/07:

Has the city made progress with these amendments to make the zoning more efficient at producing the zoned densities?

DLCD
11/20/06:

The statement at the top of the page [p. 20, amended] may be true for the decade of 1990-2000, but the trend toward construction of single family homes in the last five years is more relevant.

City of Roseburg
12/1/06:

2000-2005 trend data has been added.

DCLD
2/7/07:

No response.

DLCD
11/20/06:

Table 24 [p. 23] – Did Douglas County adopt the 2025 population projection of 44,213? It is not a coordinated population projection,

¹ Under Goal 10:Housing, ORS 197.303, and OAR 660-008-0005(11), "needed housing" means housing types that meet the need shown for housing within a UGB at price ranges and rent levels that are commensurate with the financial capabilities of Oregon households and allow for flexibility of housing location, type and density. For cities with populations greater than 2,500, "needed housing" types that must be provided include detached single-family, attached single-family, manufactured homes, multiple-family, mobile home or manufactured dwelling parks, and government-assisted housing.

as required by ORS 195.036, unless the county adopted this figure.

City of Roseburg
12/1/06:

The county's adopted coordinated growth rate for Roseburg is 2.5 percent. The 44,213 figure for 2025 is based on a 2.5 percent growth rate. As pointed out by DLCD, this figure should be updated to reflect a 2027 projection.

Upon closer inspection, staff discovered that the 2000 U.S. Census base number of 25,490 for the Roseburg urban area was used for the projection, but it was mistakenly calculated from the year 2004. The corrected population forecast for 2027 at the adopted 2.5% growth rate is 49,649.

DLCD
2/7/07:

No response.

DLCD
11/20/06:

Table 25 [p. 23] – Please make clear what is included in “single-family.” Does it contain attached units (townhouses) and mobile homes on individual lots? Are the 608 “mobile homes” in parks?

City of Roseburg
12/1/06:

As indicated on the following page of the report (p. 24), “single-family” includes all single-family dwellings and mobile homes on individual lots. “Mobile homes” signifies mobile homes in parks.

DLCD
2/7/07:

No response.

DLCD
11/20/06:

We believe that the average lot sizes stated for single-family, duplex, multi-family and mobile home parks [p. 24], based on recent building permit records, do not comply with Goals 10 and 14. The historic trend is only one factor used to determine future housing needs. In Roseburg's case, because the historic trend is inconsistent with demographic trends, it has less relevance. For a city of Roseburg's size, location, and demographics, we expect lots for single-family detached homes (stick-built and manufactured) and duplexes (2 units per lot) to range from a minimum of 5,000 square feet to a maximum of 7,000 square feet (6 to 8 units per acre), attached single-family homes (townhouses) on 2,000 to

4,000 square-foot lots (10 to 20 units per acre), multi-family developments at densities of 12 to 25 units per acre, and mobile home/manufactured dwelling parks at 8 to 12 units per acre.

**City of Roseburg
12/1/06:**

The assumed densities appear to be in agreement with DLCD with the exception of single-family dwellings. The City used 3.14 units/acre based on building permits from 1996-2005. Staff agrees this may be low, but lower densities in other cities have been recognized. The City does not want to disregard history altogether but understands the need for Roseburg to plan better. Therefore, a single-family density of 4.0 units/acres is assumed.

As indicated by DLCD, this is only one factor. The City intends to modify its high-density residential zones as mentioned previously. The City will modify the housing mix to reflect this. With a prohibition on single-family development or greater density requirements in high-density residential zones, the proportion of multi-family developments would increase and single-family developments would decrease accordingly.

The future mix is currently as follows:

***Single-family: 51%
Multi-family: 37%***

With a 5 percent modification, the future mix is as follows:

***Single-family: 46%
Multi-family: 42%***

This will be used in conjunction with historic trends used for density calculations.

**DLCD
2/7/07:**

Is the 3.14 units/acre net or gross? We believe a single-family density of 4.0 units/acre is too low for an efficient urban density. A single-family density of 7,500 sq. ft. or smaller lots is much more acceptable.

**DLCD
11/20/06:**

The analysis does not appear to include group housing, such as residential homes and facilities, prisons, and other institutions; government-assisted housing; or attached single-family housing.

City of Roseburg

12/1/06: *The population of those group quarters was removed from the total population projection (see p. 21).*

DLCD
2/7/07: No response.

ORDINANCE NO. 3263

AN ORDINANCE AMENDING THE ROSEBURG URBAN AREA COMPREHENSIVE PLAN BY ADOPTING AND INCLUDING THE RESIDENTIAL BUILDABLE LANDS INVENTORY AND HOUSING NEEDS FORECAST BY REFERENCE.

WHEREAS, the Roseburg Urban Area Comprehensive Plan was adopted by the City Council by Ordinance No. 2345, effective on July 1, 1982, and re-adopted by Ordinance No. 2980 on December 9, 1996; and

WHEREAS, the Roseburg Land Use and Development Ordinance No. 2363, as originally adopted July 1, 1984, and re-adopted by Ordinance No. 2981 on December 9, 1996, establishes procedures for hearing Comprehensive Plan Amendment applications; and

WHEREAS, after due and timely notice, on December 4 and 18, 2006, January 2 and February 5, 2007, the Planning Commission held public meetings regarding the adoption of the Buildable Land Inventory and Housing Needs Forecast (BLI), case file CPA-06-4, and its incorporation into the Roseburg Urban Area Comprehensive Plan; and

WHEREAS, the Planning Commission adopted Findings of Fact dated February 5, 2007 and forwarded the matter for Council consideration; and

WHEREAS, after reviewing the recommendation of the Planning Commission and conducting a public hearing on the BLI on March 12, 2007, the Council concludes that the BLI should be adopted and incorporated into the Roseburg Urban Area Comprehensive Plan; and

NOW, THEREFORE, THE CITY OF ROSEBURG ORDAINS AS FOLLOWS:

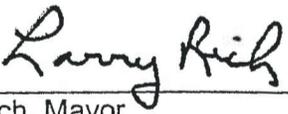
SECTION 1. The City Council hereby adopts, as its own by reference, Planning Commission Findings of Fact and Decision, dated February 5, 2007, recommending adoption of the BLI.

SECTION 2. The City of Roseburg Urban Area Comprehensive Plan is hereby amended by reference to include the BLI, which replaces the Housing Element and updates forecasts of the Population Element.

SECTION 3. The City Recorder, at the request of, or with the concurrence of the City Attorney, is authorized to administratively correct any reference errors contained herein or in other provisions of the Roseburg Municipal Code and/or the Roseburg Urban Area Comprehensive Plan as amended by the provisions added, amended, or repealed herein.

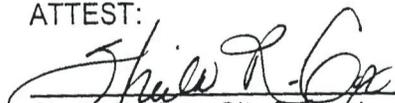
PASSED BY THE CITY COUNCIL THIS 26th DAY OF MARCH, 2007.

APPROVED BY THE MAYOR THIS 26TH DAY OF MARCH, 2007.



Larry Rich, Mayor

ATTEST:



Sheila R. Cox, City Recorder

ORIGINAL

BEFORE THE PLANNING COMMISSION
OF THE CITY OF ROSEBURG

IN THE MATTER of a legislative)	
amendment to the City of Roseburg)	FINDINGS OF FACT
Comprehensive Plan, amending the)	AND DECISION
residential Buildable Lands Inventory)	
and 20-year Housing Needs.)	FILE NO. CPA-06-04

Finding No. 1

This amends the Residential Buildable Lands Inventory (BLI) and 20-year housing needs of the Roseburg Urban Area Comprehensive Plan.

Finding No. 2

This matter came before the Planning Commission for public hearing on December 4 and 18, 2006 and January 2, 2007 in the Council Chambers of Roseburg City Hall, 900 SE Douglas Avenue, Roseburg, Oregon.

Finding No. 3

The Planning Commission takes official notice of the Roseburg Urban Area Comprehensive Plan adopted by the City Council in Ordinance No. 2345, effective on July 1, 1982, and re-adopted in Ordinance No. 2980 on December 9, 1996 and of the Roseburg Land Use and Development Ordinance (LUDO) No. 2363, as originally adopted July 1, 1984, and re-adopted in Ordinance No. 2981 on December 9, 1996, as both may have been amended from time to time. The Planning Commission takes official notice of the records of the Community Development Department.

Finding No. 4

Based on the information and data provided in the December 6, 2006 draft of the BLI, the City of Roseburg Urban Growth Boundary is deficient 1,035 acres of land to accommodate 20-year housing needs.

Finding No. 5

The Comprehensive Plan Amendment complies with Statewide Planning Goal 1, Citizen Involvement, based on the following: Notice of the legislative hearing was given by publication in the News-Review, a newspaper of general circulation, at least 20 days prior to the date of the public hearing. A workshop was held for the Roseburg City Council on October 30, 2006. The Department of Land Conservation and Development (DLCD) was provided notice 45 days in advance of the first evidentiary hearing as required by state law.

Finding No. 6

The City of Roseburg established policies and procedures that require a detailed evaluation of proposals to amend its Comprehensive Plan. Specific criteria and standards have been set forth, by which the amendment was evaluated. Land use data was provided by the Douglas County Assessor's Office, the Douglas County Planning Department, the City of Roseburg Planning Division, and the Federal Emergency Management Agency. The Roseburg Urban Area Comprehensive Plan Housing data was provided by the U.S. Census Bureau and the City of Roseburg Building Division. Population forecasts were based on adopted city-county growth trends. Calculations were based on acceptable practices of Statewide Planning Goals 10 and 14 and of planning publications furnished by DLCDC. The amendment uses an adequate factual base for policies and other decisions relating to the Comprehensive Plan. It therefore complies with Statewide Planning Goal 2, Land Use Planning.

Finding No. 7

All of the Roseburg Urban Area has previously been subjected to extensive surveys intended to inventory and evaluate Goal 5 resources. These inventories, which are incorporated into the Comprehensive Plan, have previously received acknowledgment of compliance with Statewide Goal 5 by the Land Conservation and Development Commission. The inventory excludes protected Goal 5 resource areas from the buildable lands total. The amendment therefore complies with Statewide Planning Goal 5, Open Spaces, Scenic and Historic Areas and Natural Resources.

Finding No. 8

Areas subject to the "floodway" portion of the 100-year flood plain are excluded from the inventory of buildable lands. Development in the "flood fringe" portion of the flood plain require appropriate safeguards, as prescribed by federal, state and local regulations. Areas subject to slopes greater than 12 percent are assigned density predictions based on development patterns given consideration to the preservation of open space and safety of homeowners. The amendment therefore complies with Statewide Planning Goal 7, Areas Subject to Natural Disasters and Hazards.

Finding No. 9

An additional 25 percent of the total acres needed is dedicated to public facilities, a portion of which includes land for recreation needs. The amendment therefore complies with Statewide Planning Goal 8, Recreation Needs.

Finding No. 10

The amendment plans for, and accommodates, needed housing types; it inventories buildable residential lands, projects future needs for such lands, and plans enough buildable land to meet those needs. The amendment therefore complies with Statewide Planning Goal 10, Housing.

Finding No. 11

An additional 25 percent of the total acres needed is dedicated to public facilities, a portion of which includes land for utility services. The amendment therefore complies with Statewide Planning Goal 11, Public Facilities.

Finding No. 12

An additional 25 percent of the total acres needed is dedicated to public facilities, a portion of which includes land for streets and roads. In addition, the Roseburg Transportation System Plan was adopted in 2006 and provides plans to accommodate the transportation needs of 20-year residential growth. The amendment therefore complies with Statewide Planning Goal 12, Transportation.

Finding No. 13

The 20-year planning period for this amendment begins on the date scheduled for final adoption, year 2007. The population forecast extends the current urban area forecast to the 20-year planning period by using the same growth trend for the urban area assumed in Douglas County's current adopted forecast. The amendment addresses residential housing needs without simultaneous review of other categories of land need. The amendment estimates future growth and needs for land, in accordance with Statewide Planning Goal 14, Urbanization.

Finding No. 14

The coordinated growth rate for the City of Roseburg, based on ORS 195.036, is 2.5 percent. The population forecast for the 2027 Roseburg urban area is 49,649. The current population of Roseburg, using figures from Portland State University or figures derived from a 2.5 percent growth rate applied to the 2000 U.S. Census, is less than 25,000.

Finding No. 15

The housing types needed during the 20-year planning period are as follows: single-family, 46 percent; duplex, 6 percent; multi-family, 42 percent; mobile home, 6 percent.

Finding No. 16

The City will need to accommodate 13,350 new dwelling units between 2007 and 2027.

Finding No. 17

The following Parks and Recreation Policies of the Comprehensive Plan apply to this amendment:

No. 1, Land needed for parks

Acreage amounts have been assigned to meet requirements for land needed for parks and other recreation purposes. The amendment is consistent with the intent and purpose of applicable Parks and Recreation Policies found in the Comprehensive Plan.

Finding No. 18

The following Public Facilities and Services Policies of the Comprehensive Plan apply to this amendment:

No. 1, Use of Comprehensive Plan

The scope of the amendment does not determine the location of new services. Acreage amounts have been assigned to meet requirements for land needed for public facilities. The amendment is consistent with the intent and purpose of applicable Public Facilities and Services Policies found in the Comprehensive Plan.

Finding No. 19

The following Transportation Goals of the Comprehensive Plan apply to this amendment:

No. 1, Overall Transportation System
No. 2, Enhanced Livability
No. 3, Transportation and Land Use
No. 4, Street System
No. 5, Balanced Transportation System

The amendment accounts only for land need. Acreage amounts have been assigned to meet requirements for land needed by the Transportation Plan. The amendment is consistent with the intent and purpose of the applicable Transportation Goals found in the Transportation System Plan.

Finding No. 20

The following Housing Policies of the Comprehensive Plan apply to this amendment:

No. 1, Use of Comprehensive Plan
No. 2, Housing Demand
No. 4, Encouragement of Compact Urban Growth
No. 6, Protect and Maintain Existing and Future Neighborhoods
No. 7, Redevelopment
No. 8, Low Income Housing
No. 9, Special Housing Needs

Housing mixes and demand calculations were based on adopted numbers and recommended guidelines. Redevelopment and infill lands are considered available for future housing needs. All recommended housing types were given consideration in the amendment. The City completed an evaluation that documents the land supply and 20-year housing demands, which provides supporting data to the results. The amendment

is consistent with the intent and purpose of applicable Housing Policies found in the Comprehensive Plan.

Finding No. 21

The following Land Use and Urbanization Policies of the Comprehensive Plan apply to this amendment:

- No. 1, Review of UGB
- No. 2, Considerations for Changes to UGB
- No. 14, Maintenance and Updates to Land Supply
- No. 16, Urban Growth Management Agreement with Douglas County

The amendment provides an updated inventory of the land supply as prescribed in these policies. The City notified Douglas County of the amendment, and the BLI is to be jointly established within provisions of the City of Roseburg – Douglas County Urban Growth Management Agreement. The amendment is consistent with the intent and purpose of applicable Land Use and Urbanization Policies found in the Comprehensive Plan.

CONCLUSION

This legislative action for a Comprehensive Plan Amendment was brought before a Public Hearing and based on the above findings, as well as supporting data provided in a comprehensive study, the proposed amendment complies with criteria set forth in Chapter 2 of the City of Roseburg Land Use and Development Ordinance.

DECISION

In consideration of the foregoing Findings of Fact and conclusions, the Planning Commission supports a recommendation to the City Council for **ADOPTION** of Planning File CPA-06-4, a Comprehensive Plan Amendment under Section 2.00 of the City of Roseburg Land Use and Development Ordinance.

DATED THIS 5 DAY OF FEBRUARY, 2007



Samuel J. Sweet, Chairman



Fredric F. Alley
Director of Community Development

Planning Commission Members:
Samuel J. Sweet, Chairman
Chris Clark, Vice Chairman
Jim Gamble
Ingrid Weisenbach
Ron Hughes
Patrick Parsons
Don Dole