

**CITY OF MEDFORD COMPREHENSIVE PLAN  
BUILDABLE LAND INVENTORY**

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## I. INTRODUCTION

This Buildable Land Inventory document consists of three components:

- 2007 Medford Urban Growth Boundary Buildable Land Inventory (including mapping of the specific parcels determined to contain buildable land).
- 2007 Medford Urban Growth Boundary Land Inventory (including mapping of the parcels by type).
- Methodology used to define the land inventory and buildable land inventory classifications, including assumptions.

In addition to establishing a Buildable Land Inventory, the City of Medford inventoried and mapped by classification all 18,086 acres in the Urban Growth Boundary (UGB). This overall inventory is referred separately as the “Land Inventory”. The inventories are a “snapshot in time”, and can be conducted ever few years or every year if necessary.

### **Buildable Land Inventory Purposes**

One purpose of a Buildable Land Inventory is to assist the Planning Commission, City Council, property owners, and citizens in determining whether changes in the General Land Use Plan designation of parcels are justifiable or required based on need.

In addition, the City is required by the Oregon Revised Statutes and Administrative Rules to inventory land inside the UGB to determine whether there is adequate development capacity to accommodate a 20-year need. In the analyses contained in the Housing and Economic Elements of the *Medford Comprehensive Plan*, the buildable land supply, in terms of availability and suitability for employment land, and suitability alone for residential land, is compared against the determined need (acreage and location) for the various housing and employment types. If the analyses demonstrate that the development capacity of land inside the UGB is inadequate to accommodate the estimated 20-year need, the City must satisfy the deficiency, either by increasing the development capacity of land already inside the City and UGB through amending the General Land Use Plan designations, any other portion of the Comprehensive Plan or land use regulations to include measures to increase residential densities to accommodate housing needs for the next 20 years, or by expanding the UGB, or both.

### **Buildable Residential Land**

During review of the UGB relative to land for residential uses, the City must demonstrate that the Comprehensive Plan, particularly the General Land Use Plan Map designations, provide sufficient buildable land (vacant and redevelopable) within the UGB to accommodate estimated housing needs for 20 years. Oregon Revised Statutes and Administrative Rules require the residential Buildable Land Inventory to document the

amount of buildable land in each residential plan designation in order to determine its housing capacity. The housing capacity analysis is contained in the Housing Element of the *Medford Comprehensive Plan*. For the purpose of the residential inventory, “buildable land” includes: vacant and partially developed land designated for residential use; land that may be used for a mix of residential and employment uses under the existing designation or zoning; and land that may be used for residential infill or redevelopment. It should be noted that Medford’s commercial land use designation permits both commercial land uses and multiple-family dwellings in commercial zoning districts. This fact will be taken into consideration when the analyses to determine how much land is required to accommodate housing and economic needs are conducted. Vacant and partially developed land that is not counted is that where residential development is prohibited or restricted by local, state, or federal regulation or by long-term easements for utility facilities.

### **Employment (Commercial/Industrial) Buildable Land**

Oregon Revised Statutes and Oregon Administrative Rules require a Comprehensive Plan to include an inventory of vacant and developed land designated for industrial, commercial, and other employment land within the UGB.

The Economic Element of the *Medford Comprehensive Plan* further studies inventoried vacant and developed industrial, commercial, and other employment land within the UGB. The City must provide an Economic Opportunities Analysis that compares the demand for industrial, commercial, and other employment land to the existing supply of such land. That analysis provides the site characteristics of vacant and developed parcels within each applicable plan designation and zoning district, including a description of development constraints and infrastructure needs that affect the availability and suitability of the parcels. The Economic Opportunities Analysis also identifies the total acreage and percentage of sites within each applicable plan designation or zoning district that comprise the “short-term” supply of industrial, commercial, and other employment land within the UGB. If the City adopts policies providing “prime industrial land” pursuant to Oregon Administrative Rules, the vacant or developed prime industrial land will also be inventoried.

## II. LAND INVENTORY GOALS

The goals for Medford's Land Inventory are as follows:

- 1) To create a land inventory system for Medford that is:
  - As accurate and straightforward as possible
  - Easy to update at regular intervals
  - Consistent over time for accurate comparisons
  
- 2) To inventory all land within the Medford UGB using the City's land inventory system, classifying all land as:
  - Developed
  - Redevelopable (having redevelopment potential)
  - Vacant (includes partially developed parcels)
  - Unbuildable
  - Public Right-of-Way
  
- 3) To classify the developed, redevelopable, and vacant (includes partially developed) parcels within the Medford UGB into each of the following General Land Use Plan designations:
  - Urban Residential (UR)
  - Urban Medium Density Residential (UM)
  - Urban High Density Residential (UH)
  - Service Commercial (SC)
  - Commercial CM (includes "City Center" (CC) designated land )
  - General Industrial (GI)
  - Heavy Industrial (HI)
  - Airport and Parks/Schools (A and PS)
  
- 4) To inventory the buildable land (vacant, including partially developed, and redevelopable parcels) within the Medford UGB, classifying it according to the above land use designations. Note that there is no buildable land in the Airport and Parks/Schools designation. See the explanation under "Land Inventory Methods".

### III. PREVIOUS BUILDABLE LAND INVENTORIES

Medford's previous Buildable Land Inventories were adopted in 1993, 1994, and 2006 with the updating of the Housing and Economic Elements of the Comprehensive Plan. The Planning Department periodically published buildable land estimates, with the last occurring in 2001 and 2002. In addition, estimates were also made in 2004 for the Regional Problem Solving program.

The 1994 Housing Element found 3,900 acres of buildable residential land (not including redevelopable sites) in the UGB. The 1994 Housing Element found that there would be a need for 2,140 acres of residential land between 1994 and 2010, or an average of 134 acres per year. The 2007 Buildable Land Inventory found 2,318 acres of residentially designated buildable land, **not including redevelopable sites**. Between 1994 and 2007, the residential land supply appears to have been reduced by 1,582 acres, an average utilization of 122 acres per year by residential development or conversion to non-residential uses.

The 1993 Economic Element found 1,360 acres of buildable industrial, commercial, and other employment land (not including redevelopable sites) in the UGB. The 2006 Economic Element Update (2004 data) found 1,638 acres of industrial, commercial, and other employment buildable land, including redevelopable sites. The 2007 Buildable Land Inventory found 1,546 acres of industrial, commercial, and other employment buildable land, **including redevelopable sites**, in the UGB. In addition to subtractions from the inventory over time due to new development and conversion to other uses, these varying inventory totals are likely caused by methodology inconsistencies. The closing of large facilities, primarily lumber mills, also adds land to the inventory.

### IV. LAND INVENTORY

#### Full Land Inventory

**Table 1**, entitled **All Land in Medford UGB**, indicates Medford's 2007 full Land Inventory by General Land Use Plan designation. The data used was as of March 2007.

The City's land inventory process classified all land in the UGB into one of the following categories:

- Developed
- Vacant
- Partially Developed Residential
- Redevelopable (having redevelopment potential)
- Unbuildable
- Public Right-of-Way

Of the 18,086 acres in the UGB, 15,374 acres are in 28,208 individual parcels, and 2,700 acres are public right-of-way. There are 10,168 developed acres and 488 unbuildable acres.

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<b>Table 1 All Land in Medford UGB</b>				
	Vacant	Redevelopable	Partially Developed Residential	Developed
<b>GLUP</b>	<i>Acres</i>	<i>Acres</i>	<i>Acres</i>	<i>Acres</i>
Commercial & City Center (CM & CC)	209	105		1304
Service Commercial (SC)	50	27		231
General Industrial (GI)	445	271		676
Heavy Industrial (HI)	350	89		680
Urban High Density Residential (UH)	100	86	23	594
Urban Medium Density Residential (UM)	30	3	12	4
Urban Residential (UR)	1651	706	572	5486
Other (Airport & Parks/Schools)				1192
<b>Total</b>	<b>2834</b>	<b>1287</b>	<b>608</b>	<b>10168</b>
<b>ADOPTED February 21st, 2008</b>			<b>Unbuildable Acres: 488</b>	
<b>ORDINANCE #2008-03</b>			<b>Public Right-of-Way Acres: 2700</b>	
Property Class data source: Jackson County, March 2007			<b>Medford UGB Acres: 18086</b>	

**Buildable Land**

Table 2, entitled **Buildable Land Inventory in Medford UGB**, indicates Medford’s 2007 Buildable Land Inventory by General Land Use Plan designation.

Buildable land includes the following categories:

- Vacant
- Partially Developed Residential
- Redevelopable (having redevelopment potential)

**Partially Developed Residential** land is inventoried separately due to the need to perform a calculation of what portion of a partially developed residential parcel is vacant. It is not necessary to do the same for industrial and commercial land because partially developed industrial and commercial land is manually determined and able to be placed in the “vacant” category.

**Redevelopable Land** is made up of developed parcels that have a low improvement value and therefore have the potential to be redeveloped. Redevelopable parcels are determined by assuming that, if the ratio of real market improvement value to land value is less than or equal to .33, the parcel is redevelopable.

The methodology utilized to calculate the vacant, partially developed residential, and redevelopable acreage is explained more fully below under “Land Inventory Methods”.

**Table 2** Buildable Land Inventory in Medford UGB

	Vacant	Redevelopable	Partially Developed Residential	Total Buildable Land
<i>GLUP</i>	<i>Acres</i>	<i>Acres</i>	<i>Acres</i>	<i>Acres</i>
Commercial & City Center (CM & CC)	209	105		314
Service Commercial (SC)	50	27		77
General Industrial (GI)	445	271		716
Heavy Industrial (HI)	350	89		439
Urban High Density Residential (UH)	100	86	21	207
Urban Medium Density Residential (UM)	30	3	11	44
Urban Residential (UR)	1651	706	505	2862
<b>Total</b>	<b>2834</b>	<b>1287</b>	<b>537</b>	<b>4658</b>

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 Property Class data source: Jackson County, March 2007



Note: Buildable land includes the acreage of vacant parcels, and the acreage of the vacant portion of partially developed parcels; and the acreage of redevelopable parcels. Redevelopable parcels are those with an improvement to land value <math>\leq 0.33</math> pursuant to Jackson County Assessment data as of March 2007.

**Mapping**

The 2007 Buildable Land Inventory is mapped on a series of maps entitled Medford 2007 Buildable Land Inventory. There are three sets of maps, each set based on General Land Use Plan designations: Residential Lands (UR, UM, UH), Commercial Lands (CM, CC, SC), and Industrial Lands (GI, HI). The extent of each of these categories is also shown. The maps also indicate “unbuildable” and “developed” land, and public right-of-way. Each set consists of four maps encompassing the four quadrants of the Medford UGB. The maps are available from the City of Medford Planning Department, 200 South Ivy Street, Medford, OR 97501 or on the City of Medford website [www.ci.medford.or.us](http://www.ci.medford.or.us) on the Planning Department webpage.

## V. LAND INVENTORY METHODS

Due to the large size of the City and the nearly 30,000 parcels, the City's land inventory process relies heavily upon the Jackson County Assessor's electronic data system to classify parcels as developed, vacant, redevelopable, and unbuildable. To aid in tax assessment, the County system classifies parcels using a data field called "property class". There are hundreds of different property classes. This field is updated based on actions such as approved zone changes and issuance of building permits. The most important property classes are those that classify parcels as "vacant".

### Developed Land

In addition to parcels considered fully developed by the Jackson County Assessor's electronic data system, publicly- or quasi-publicly-owned parcels, including those with the designation of Parks/Schools or Airport, are considered "developed". Although several of these parcels may not yet be improved with their planned facilities, they are committed to public or quasi-public uses and not available to help meet the City's future residential, commercial, or industrial land needs.

### Redevelopable Land

"Redevelopable" (having redevelopment potential) parcels are determined by using the ratio of real market improvement value to land value. These values are included in the Jackson County Assessor's electronic data system. If the ratio is less than or equal to .33, the parcel is considered redevelopable, except that small parcels under .05 acre in size are not included. In addition, parcels designated for commercial and industrial use that are vacant and less than .50 acre in size and those that are partially developed and less than 5.0 acres in size must be included in this category per the Oregon Administrative Rules. The "miscellaneous" classified parcels, such as golf courses and gun clubs, for which obtaining the ratio of land value to improvement value is not possible due to the tax assessment system, are also considered redevelopable due to their low level of coverage by structures or other physical improvements, unless they have an "open space" assessment. Properties with an open space assessment cannot be counted as buildable land per the Oregon Administrative Rules.

### Vacant Land

The City's vacant land inventory utilizes "vacant" property classes, but excludes vacant parcels under .08 acre (3,485 square feet) in size. Most such small parcels are tiny remnants such as "street plugs" (very small City-owned parcels within rights-of-way where streets will extend in the future). The .08 acreage (3,485 square feet) figure was chosen because the minimum size for new lots is 3,600 square feet. Although there may be several vacant lots under .08 acre in size that potentially could meet site development standards and be developed, their total acreage is insignificant.

The partially developed residential inventory counts residential parcels 1.0 acre in size or greater that are partially developed, through subtracting .25 acre per developed dwelling unit and counting the remainder of the parcel, if the remainder is larger than .25 acre. 1.0 acre was utilized in this calculation because a smaller parcel size results in lots with an SFR-2 (Single-Family Residential – 2 units per acre) zone being categorized as “partially developed” even though they are not likely further dividable. Such lots are located in the east hillside areas. In areas where there are lots with this infill capability, such as far west Medford, nearly all such lots exceed 1.0 acre in size due to the previous County zoning of SR-1 (Suburban Residential – 1.0 acre minimum lot size) and SR-2.5 (Suburban Residential – 2.5 acre minimum lot size).

This system is not feasible for partially developed commercial and industrial parcels because subtracting an average acreage would be inaccurate due to the wide ranging amount or percentage of lot usage. Therefore, for commercial and industrial parcels over 5.0 acres in size that are partially developed, a manual system is used that estimates the amount of vacant land on each partially developed parcel, and adds that amount, if it is greater than .50 acre, to the “vacant” category. This system uses a combination of aerial photography and fieldwork.

### **Unbuildable Land**

“Unbuildable” land is primarily that which is affected by environmental constraints. These constraints are wetlands on the Local Wetland Inventory, adopted Riparian Corridors, and floodways. The County property class system also indicates those tax lots considered completely unbuildable for reasons of size, contamination, etc.

## Oregon Administrative Rules Excerpts Pertaining to Buildable Land Inventories

### 660-024-0050 Land Inventory and Response to Deficiency

- (1) When evaluating or amending a UGB, a local government must inventory land inside the UGB to determine whether there is adequate development capacity to accommodate 20-year needs determined in OAR 660-024-0040. For residential land, the buildable land inventory must include vacant and redevelopable land, and be conducted in accordance with OAR 660-007-0045 or 660-008-0010, whichever is applicable, and ORS 197.296 for local governments subject to that statute. For employment land, the inventory must include suitable vacant and developed land designated for industrial or other employment use, and must be conducted in accordance with OAR 660-009-0015(3).
- (3) As safe harbors when inventorying land to accommodate industrial and other employment needs, a local government may assume that a lot or parcel is vacant if it is:
  - (a) Equal to or larger than one-half acre, if the lot or parcel does not contain a permanent building; or
  - (b) Equal to or larger than five acres, if less than one-half acre of the lot or parcel is occupied by a permanent building.
- (4) If the inventory demonstrates that the development capacity of land inside the UGB is inadequate to accommodate the estimated 20-year needs determined under OAR 660-024-0040, the local government must amend the plan to satisfy the need deficiency, either by increasing the development capacity of land already inside the city or by expanding the UGB, or both, and in accordance with ORS 197.296 where applicable. Prior to expanding the UGB, a local government must demonstrate that the estimated needs cannot reasonably be accommodated on land already inside the UGB.

### 660-024-0010 Definitions In this division, the definitions in the statewide goals and the following definitions apply:

- (2) "Safe harbor" means an optional course of action that a local government may use to satisfy a requirement of Goal 14. Use of a safe harbor prescribed in this division will satisfy the requirement for which it is prescribed. A safe harbor is not the only way or necessarily the preferred way to comply with a requirement and it is not intended to interpret the requirement for any purpose other than applying a safe harbor within this division.

### 660-008-0010 Allocation of Buildable Land

The mix and density of needed housing is determined in the housing needs projection. 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. The local buildable lands inventory must document the amount of buildable land in each residential plan designation.

### 197.296 Factors to establish sufficiency of buildable lands within urban growth boundary; analysis and determination of residential housing patterns.

- (1) (a) The provisions of this section apply to metropolitan service district regional framework plans and local government comprehensive plans for lands within the urban growth boundary of a city that is located outside of a metropolitan service district and has a population of 25,000 or more.
- (2) At periodic review pursuant to ORS 197.628 to 197.650 or at any other legislative review of the comprehensive plan or regional plan that concerns the urban growth boundary and requires the application of a statewide planning goal relating to buildable lands for residential use, a local government shall demonstrate that its comprehensive plan or regional plan provides sufficient buildable lands within the urban growth boundary established pursuant to statewide planning goals to accommodate estimated housing needs for 20 years. The 20-year period shall commence on the date initially scheduled for completion of the periodic or legislative review.
- (3) In performing the duties under subsection (2) of this section, a local government shall:
  - (a) Inventory the supply of buildable lands within the urban growth boundary and determine the housing capacity of the buildable lands; and
  - (b) Conduct an analysis of housing need by type and density range, in accordance with ORS 197.303 and statewide planning goals and rules relating to housing, to determine the number of units and amount of land needed for each needed housing type for the next 20 years.
- (4) (a) For the purpose of the inventory described in subsection (3)(a) of this section, "buildable lands" includes:
  - (A) Vacant lands planned or zoned for residential use;

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- (B) Partially vacant lands planned or zoned for residential use;
- (C) Lands that may be used for a mix of residential and employment uses under the existing planning or zoning; and
- (D) Lands that may be used for residential infill or redevelopment.
- (b) For the purpose of the inventory and determination of housing capacity described in subsection (3)(a) of this section, the local government must demonstrate consideration of:
  - (A) The extent that residential development is prohibited or restricted by local regulation and ordinance, state law and rule or federal statute and regulation;
  - (B) A written long term contract or easement for radio, telecommunications or electrical facilities, if the written contract or easement is provided to the local government; and
  - (C) The presence of a single family dwelling or other structure on a lot or parcel.
- (c) Except for land that may be used for residential infill or redevelopment, a local government shall create a map or document that may be used to verify and identify specific lots or parcels that have been determined to be buildable lands.

**660-009-0015 Economic Opportunities Analysis**

Cities and counties must review and, as necessary, amend their comprehensive plans to provide economic opportunities analyses containing the information described in sections (1) to (4) of this rule. This analysis will compare the demand for land for industrial and other employment uses to the existing supply of such land.

- (3) Inventory of Industrial and Other Employment Lands. Comprehensive plans for all areas within urban growth boundaries must include an inventory of vacant and developed lands within the planning area designated for industrial or other employment use.
  - (a) For sites inventoried under this section, plans must provide the following information:
    - (A) The description, including site characteristics, of vacant or developed sites within each plan or zoning district;
    - (B) A description of any development constraints or infrastructure needs that affect the buildable area of sites in the inventory; and
    - (C) For cities and counties within a Metropolitan Planning Organization, the inventory must also include the approximate total acreage and percentage of sites within each plan or zoning district that comprise the short-term supply of land.
  - (b) When comparing current land supply to the projected demand, cities and counties may inventory contiguous lots or parcels together that are within a discrete plan or zoning district.
  - (c) Cities and counties that adopt objectives or policies providing for prime industrial land pursuant to OAR 660-009-0020(6) and 660-009-0025(8) must identify and inventory any vacant or developed prime industrial land according to section 3(a) of this rule.