

Received at Planning Commission meeting - 3/16/10  
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D. and K. Mallams  
2855 Heritage Road  
Central Point, OR 97502  
March 16, 2010

Central Point Planning Commission  
140 South Third Street  
Central Point, OR 97502

Dear Planning Commissioners,

Thank you for the opportunity to present our concerns regarding the Urban Reserves Central Point is proposing as part of the Bear Creek Valley Regional Problem Solving Process.

We find it hard to believe that Central Point's Key Elements of Community Identity has not one word about being surrounded by some of the best agricultural land in the Bear Creek Valley. The city-centric pattern and rapid population growth that Central Point has chosen to follow is directly contrary to the goals of RPS. One of the primary goals of RPS is to conserve resource lands. RPS provides the means to do this by allowing trade-offs in growth among cities. Central Point is the poster child for cities in the valley that should base the location and amount of growth primarily on the goal of protecting high-value resource lands.

#### **CP-6A**

A significant portion of these high-value resource lands are contained in CP-6A. The statement on page 4-24 that one third of CP-6A is exception lands is misleading and based solely on how the boundaries were drawn. Atlas Map Page 29 presents a very misleading view of the current land uses in the northern part of CP-6A. The labels for the residential land spread over huge areas, when in fact they apply to very small parcels compared to the large contiguous block of agricultural land. The map labels make it look like the residential parcels cover a much larger area than they do. Almost all the exception lands in CP-6A are clustered in 140 acres at the south end. They are very different from the 300 acres of contiguous blocks of agricultural land that make up the majority of CP-6A. They should be addressed with the adjacent exception lands in CP-6B. This would clearly differentiate the two, and show that although there are a handful of dwellings within the area of large agricultural parcels, they have not been compromised by development. The existing minimal development does not interfere with agricultural activity in the area. These large parcels should be preserved for future agricultural use.

At a Central Point City Council meeting on April 25, 2002, Tom Humphrey and several city councilors expressed the importance of protecting the integrity and viability of agricultural land to the west of Grant Road that is now included in CP 6A. They agreed the City should not expand into that area. At an earlier meeting the City acknowledged that growth onto agricultural lands to the west of the City (now Twin Creeks) was a mistake they would not make again. What has changed? Nothing. The contention that the land is only used for grazing or lying fallow is untrue. A commercial poultry and egg operation also exists along with a meat goat operation. Hay is being raised as well as strawberries - the strawberries an

expansion of a very successful operation on former orchard land on Hanley Road. This shows how new and unforeseen crops appear and become successful if land is available. It validates the Resource Lands Review Committee recommendation that this land remain part of the commercial agricultural land base. The pCIC seconded this recommendation when they recommended no new residential growth to the west of Grant Road. Central Point should abide by these recommendations.

On page 3-6 the Draft Report states "...the farm land west of Central Point...is located within the region's highest capability soils.... Based on recommendations by the pCIC and RLRC, **each of the participating jurisdictions agreed that further urbanizing the interspersed exception lands in those areas, or expanding municipal growth to the West Valley foothills (along the geographic path of exception areas) would have severe negative consequences for farmland in the interior valley.** This speaks directly to the consequences of urbanizing the exception areas in CP-6A on the agricultural land to the west and north. Similarly, urbanizing CP-6B would have negative consequences for prime agricultural land to the south such as the 320 acre J.Herbert Stone Nursery, and east such as Elk Farms, Inc. In our experience, agricultural buffers do not work – they are not strictly enforced and people still complain. These areas should remain Rural Residential.

We believe RPS deviated grievously from its original purpose of protecting agricultural land from urbanization when it failed to place the RLRC identified land within agricultural reserves for long term protection.

#### **Gibbon/Forest Acres Urban Containment Area**

At RPS Policy Committee meetings on December 19, 2006 and January 9, 2007 John Renz (DLCD) stated that Central Point must include Gibbon Acres in an urban reserve because 1) it is an urban area within an urban containment area, 2) the Jackson County Comprehensive Plan states that it should be included within an urban growth boundary of an adjacent city, and 3) it is at least as high priority as exception lands and probably higher. Including this area in an Urban Reserve for Central Point could take the place of commercial agricultural lands to the west of the City. Central Point argues that they do not have to include this area because it is not adjacent to its existing urban growth boundary and does not promote a compact urban core. If that is the case, then how does the City justify including CP-1B (Tolo)? That is no more adjacent or compact than Gibbon Acres. Gibbon Acres is adjacent to the well-developed transportation corridor along Table Rock Road. The water and sewage treatment plants are up Table Rock Road. In any case, the policy does not say that the area must be adjacent to the existing urban growth boundary. It says Gibbon Acres should be included within an adjacent city. Central Point is an adjacent city. It is more consistent with the goals of RPS to include Gibbon Acres than to urbanize large parcels of commercial agricultural land using the excuse that they can be master planned.

#### **CP-1B Tolo/Seven Oaks**

We are very concerned that urbanization of this area, even with industrial zoning, will lead to tremendous pressure for the type of ugly, sprawl and congestion-creating commercial and residential development there and along Highway 99 that has occurred at other freeway exits. In spite of all good intentions, once the infrastructure is there, development always wins.

Continued emphasis on expansion at the fringes and constant growth will lead to more urban blight in downtown Central Point. The struggles of Medford's central business district and ~~and~~ west Medford neighborhoods are an example of the consequences and should be a warning.

Thank you for your consideration. We hope you will recommend significant changes to this draft plan that will better protect agricultural land before submitting it to the City Council.

Sincerely,

*Duane and Katy Mallams*

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Planning Commission  
City of Central Point  
City Hall  
Central Point, OR 97502

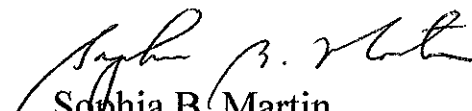
Dear Commissioners,

We would like to see the Planning Commission recommend to the Central Point City Council that they approve the Regional Plan as proposed by the Regional Problem Solving (RPS) Policy Committee. We believe the Regional Plan will benefit Central Point as well as the other cities in the plan. One of the main benefits of this plan, if finalized, will be the ability of the various cities in conjunction with the MPO and the county to do some long-range comprehensive transportation planning for the region.

We also think the proposed Urban Reserve Areas for Central Point have been well considered and are appropriate for the plan. Our property is currently in the proposed Urban Reserve Area CP-6A and we would like it to stay in.

Thank you for your service to our community.

  
Larry E. Martin

  
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