

May 18, 2014

Dear Ashland City Councilors:

My concerns as a resident of the Normal Neighborhood Plan are as follows:

1. Density and Zoning

According to the 2011 City of Ashland Buildable Lands Inventory (BLI), and as was stated by Planning Director Molnar in his summary at the May 6, 2014 Council Meeting, **there is a surplus within City Limits of developable land required by the State.** The “apparent needed housing” presented in the Normal Neighborhood Plan (NNP) would be best applied to urbanize the available lands within the City Limits first, and then spread any growth of needed zoning classifications throughout the additional vacant lands in the Urban Growth Boundary (UGB), as well as in the NNP. Development is certainly justified in the NNP, and a coherent design is applauded, but such concentration solely in the NNP of unnecessarily dense zoning creates traffic issues with exorbitant capital improvements needed for a single arterial, as well as access and financing issues over a private RR crossing and effects on natural water features within the NNP. A more sensible neighborhood plan would take into consideration the existing neighborhoods and natural features and have the new developments complement rather than overpower them. How can the City even design any increase in 450-500 new homes (as in the NNP after it is annexed into the City limits) when there has just been a Water Curtailment Notice on May 1, 2014 describing “the amount of water consumed by current Ashland water users **exceeds** the amount of water flowing in the City’s Reeder Reservoir?”

According to the Ashland COMP Plan, “zoning decisions must be in agreement with the COMP Plan Map 2.03.04 (www.ashland.or.us/Files/Comprehensive_Plan.pdf), meaning they cannot be of greater density or intensity than allowed on the Plan Map”, which shows the NNP to have only Single Family Residential (max of 4-6 Dwelling Units/acre) and Suburban Residential (max of 7-9 Dwelling Units/acre) zoning. This City COMP Plan ruling is directly contradicted in the currently presented NNP Land Use Designation Overlay Zoning densities mapped out by the Planning Commission for your review.

The current iteration of the NNP Land Use Designation Overlay Zones shows multiple areas surrounding Open Space/Conservation Areas with densities of NN-02 (5-10 Dwellings/acre). The Planning Dept. has said land owners will be compensated for Conservation Areas/Open Spaces not available for development, by allowing 50% density increases on their remaining lands, rather than outright City acquisition. This doesn’t follow the COMP Plan’s direction (18.14.02) to purchase the Open Space. When these remaining lands abut a Single Family Residential (SFR) existing neighborhood, the 50% increase in density could allow, with a CUP or major amendment, a 3 story, 40’ tall multi-family building alongside a single family, 1-story existing residence. **The original intent of the NNP to maintain the existing neighborhood character is negated.** Zoning densities planned for these areas adjacent to Open Spaces should be amended for these planned 50% increases and start out with NN-01, rather than NN-02, next to the open space properties identified on the NNP, so that Open Spaces and existing SFR are not potentially crammed in next to NN-03 (10-15 multifamily units/acre).

2. Building Heights in the NNP

A last minute Planning Comm. modification allows, with a CUP, an increase of building height to 40' to "give the developers a little more flexibility in design". Why is this building height allowable in the NNP when this directly **contradicts the Ashland Municipal Code 18.22.040** which limits all buildings to 35' and 2.5 stories everywhere else within the City? Cottage Housing, which is incorporated in the NNP design, is designated in the November 2013 Unified Land Use Ordinance (ULUO) as "single story, one and one-half story, or single story plus a loft. Building height of all structures shall not exceed 18'. The highest point of a pitched roof may extend up to 25' at the ridge of the roof." How is this ordinance definition allowed to be modified for the NNP?

3. Water Resource Land / Natural Features / Open Space Network

As identified in the City of Ashland Comprehensive Plan, the "Normal Street Wetlands (8.09.07) is poorly suited for development and may contain significant wildlife habitat. The Plan calls for **acquisition and retention of the wetland**. The area should be enhanced as a wetland, with development limited to trails that would provide for bird watching and the study of nature". This tract of land, identified by the 2005 City of Ashland Parks, Trails, & Open Space Program Map (https://www.ashland.or.us/Files/Parks_OS_Plan_2005.pdf), is listed as **not yet acquired by city**, but as remaining on the proposed plan. This Normal Street Wetlands has been listed on the City's 2007 Local & State Wetlands Inventory as the largest designated water resource in Ashland, now known as Wetlands #9. It is identified as a significant hydrologic ecosystem of 5.38 acres privately owned within the NNP. **Why isn't a proposal in the NNP to acquire this tract of land prior to development, as outlined in the Comp Plan Acquisition Strategies?** The Comp Plan states (8.14.02) that "it is in the City's best interest to negotiate with the property owner and purchase the land before it is ripe for development". What if the owner mitigates, or basically removes such a resource prior to City purchase or zoning density compensation? How, then, will the outlined amount of acreage of Open Spaces/Conservation Areas be preserved for the NNP?

The goal of the COMP Plan Open Space Policy (8.15) is to provide the people of Ashland with a variety, quantity, and quality of parks & open spaces. With this Wetland #9 adjacent to the Ashland Middle School, it would fulfill the COMP Plan policy (8.16.3) to encourage school-park joint developments as an educational and scientific resource. Preserving this Wetland #9 also allows for the current residents in the NNP and north of E. Main St. to use this water resource on which they depend for: 1) recharging the aquifers that feed their wells, 2) holding temporary seasonal flood waters from damaging downstream properties, and 3) providing water for their surface agriculture.

I strongly encourage **reviewing and scrutinizing the density of this NNP development** for all the above issues, as well as those stated by other concerned citizens, i.e. capital improvement funding, city-wide infrastructure & access costs, and increased demand on city services & facilities.

Thanks for integrating public input into your decisions,

Sue DeMarinis, resident of Normal Ave. Neighborhood