

FILE NO: LRP2009-00010

APPLICANT: Jackson County- RPS

HEARING DATE: 1-28-2010

HEARING BODY: J.C. Planning Commission

PAGE: -2-

**EXHIBIT SCHEDULE**

EXHIBIT NO.	NATURE OF EXHIBIT
21 Page 245	Written testimony submitted by Paige Townsend, dated 4-6-10
*****	<i>JCPC Continued Public Hearing 4-8-2010.</i>
22 Page 246	PowerPoint presentation from staff at 4-8-10 Public Hearing
23 Page 262	Written comment from Hazel Ellefson, Eagle Point Irrigation, dated 4-5-10
24 Page 263	Written comment from Lora May, Elk City Water District, dated 4-5-10
25 Page 264	Written comment from Ned Soso, City of Butte Falls, dated 4-6-10
26 Page 265	Written comment from Russ Branjon, Pinehurst School District, dated 4-6-10
27 Page 266	Written comment from Gregory Alexander, RV Fire Prevention Coop, 4-6-10
28 Page 267	Written comment from Michele E. Hanson, US Army Corp of Engineers, 4-12-10
29 Page 268	Written comment from Robert L. Scott, Upper Rogue CAC, dated 4-9-10
30 Page 269	RVTD 10 Year Long Range Plan, submitted by Staff
31 Page 280	Memo from Staff to Commissioners, dated 4-14-10
*****	<i>JCPC Continued Public Hearing 4-22-10.</i>
32 Page 286	Clover/Meadows Lane Petition submitted by Mike Arnold, 4-22-10
33 Page 292	Written Testimony from Bob Hart, 4-22-10
34 Page 299	Written Testimony from Kate Jackson, 4-22-10
35 Page 301	Written Testimony from Robert Bluth, Harry & David, 4-22-10
36 Page 304	Written Comment from Hugh Holden, Fire District #3, dated 4-13-10
37 Page 305	Written Comment from William Kabeiseman, dated 4-12-10
38 Page 312	Written Comment from Steven Niemela, ODF&W, dated 4-29-10
39 Page 316	Written Comment from Carl Tappert, RVSS, dated 5-7-10
40 Page 337	E-Mail Comment from Robert Boggess, Naumes Properties LLC, dated 5-7-10
*****	<i>JCPC Continued Public Hearing 5-13-10.</i>



# Oregon

Theodore R. Kulongoski, Governor

Department of Fish and Wildlife

Rogue Watershed District Office

1495 East Gregory Road

Central Point, OR 97502

(541) 826-8774

FAX: (541) 826-8776

April 27, 2010

RECEIVED

MAY 03 2010  
JACKSON COUNTY  
PLANNING



Josh LeBombard  
Re: Regional Problem Solving  
Development Services  
County Courthouse  
10 South Oakdale Avenue  
Room 100  
Medford, OR 97501-2902

Dear Josh:

Thank you for providing ODFW with an opportunity to comment on Jackson County's Regional Problem Solving (RPS). ODFW acknowledges that Jackson County is growing, and that the majority of predicted growth will occur within urban areas. By designating areas that can prudently accommodate growth, hopefully, larger impacts to resource land and fish and wildlife resources can be avoided.

Throughout the state of Oregon, high elevation habitats dominated by conifers have been protected from development by federal ownership. Low-valley habitats such as grasslands, riparian areas, and oak woodlands have historically been heavily impacted by development. Increasing urbanization throughout the Bear Creek Valley will, by its nature, take place in habitat that is rare and disproportionately valuable at a statewide level.

### **Economic Benefit of Fish and Wildlife Resources**

It is appropriate that the RPS overview acknowledges the loss of farm and forest land to urban expansion (Page 1-10). In addition to agricultural and economic benefits, resource lands provide a variety of ecological services to the citizens of Jackson County including, air purification, groundwater recharge, biodiversity maintenance, pollination, seed dispersal, and the production of game species. ODFW supports the RPS's second goal to "*Conserve resource and open space land for their economic, cultural, and livability benefits,*" and recommends the word *ecological* be inserted into this goal to draw attention to the additional services these lands provide (Page 1-10).

Jackson County Planning Commission

File No. LRP2009-00010 Exhibit # 38

Offered by: Steven Niemela

Date: 5-12-2010 Received by: Pg

-312-

The overview adequately summarizes the economic benefits resource lands provide to Jackson County from traditional agricultural and forestry operations. However, fishing, hunting, and wildlife viewing are also a major contributor to Jackson County's local economy. In 2009, ODFW commissioned a report on the economic value of fish and wildlife resources in the state of Oregon. According to this report, fishing, hunting, and wildlife viewing contributed \$32,280,000.00 to Jackson County's economy through travel related expenditures (8.7% of all travel related expenditures for the County) and another \$8,443,000.00 in local expenditures in 2008. ODFW recommends:

- insertion of draft language in the overview acknowledging the ecological and economic benefits derived from fish and wildlife species on resource lands.
- development of an additional guiding policy related to sustainable fish and wildlife species.

### **Vernal Pools**

Vernal pools are a high priority habitat due to their restricted geographic range, previous history of degradation, and the presence of the federally threatened vernal pool fairy shrimp. ODFW supports the use of vernal pools as an environmental physical constraint on the location of urban reserves. Four urban reserves (CP-1B, CP-2B, EP-2, and MD-1) currently include vernal pool habitat. Each of these areas has acreage listed as being physically constrained, presumably due in part to the presence of vernal pools. If this is not the case, ODFW recommends the unconstrained acreage be reduced to account for this valuable habitat.

### **Deer and Elk Winter Range**

The proposed urban reserves will potentially impact the grizzly unit of especially sensitive deer and elk winter range, and the west valley unit of other winter range. The grizzly unit has been designated as winter range due to its use by economically valuable migratory deer during the winter season. The urban reserves within the grizzly unit are almost completely devoted to Chrissy and Prescott Parks. ODFW does not object to the inclusion of these lands within the urban reserve as long as they remain in an open space/park condition. However, none of the descriptions of the environmental consequences for the relevant urban reserves mention deer and elk winter range. ODFW recommends that Goal 5 designated winter range be listed as a physical constraint to limit the citing of urban reserves within big game habitat, unless their inclusion will be in the form of a park or open space. This would result in the elimination of small fragments of the urban reserves within the grizzly unit (MD-3, MD-5), and approximately 65 acres of urban reserve near the city of Talent (TA-3).

### **Riparian Vegetation**

A number of streams are located within the proposed urban reserve areas. All streams in SW Oregon, including urban streams, provide benefits to fisheries resources. Many of the streams provide spawning and rearing habitat for native fish. Even some of the smallest streams can provide important refugia for juvenile fish at certain times during the year. Non fish bearing stream are important because they contribute to flow and water quality in the larger streams and rivers. Retention of riparian vegetation is critical to protecting these freshwater habitats. If these streams are incorporated into urban growth areas, ODFW recommends the existing Jackson County riparian protection rules be retained for each stream, or that other rules that comply with the Goal 5 protection standards be applied.

### **Non-game Habitat**

A number of sensitive non-game species have been documented within proposed urban reserve areas. ODFW recommends municipalities take the following actions to preserve wildlife habitat:

- Use native plants for landscaping whenever possible
- Cluster development and retain open space
- Increase the amount of land in urban parks, and retain natural habitats
- Develop corridors of natural vegetation linking open space, parks, and adjacent natural habitat
- Retain as much natural vegetation as possible
- If applicable, retain mature oaks and ponderosa pine as legacy trees. Mature oaks are particularly valuable to a wide variety of species, and may take hundreds of years to reach their full potential. Oak and ponderosa pine woodlands have an important conservation status on a statewide level, and are designated as a Strategy Habitat in the Oregon Conservation Strategy
- Retain snags and down woody debris whenever possible. These structures are important and limited resources for a large number of non-game species

### **Wildlife Conflict**

Any expansion of development into rural areas and resource lands will increase wildlife conflict. Currently, raccoons, opossums, deer, elk, cougars, bears, and other species cause considerable damage to residential developments. Improper storage of waste, feeding wildlife, and the creation of habitat within the built environment all exacerbate negative interactions with wildlife. Awareness of these issues and planning ahead may help reduce some of these problems. ODFW recommends municipalities take the following actions:

- Adopt ordinances that ban the feeding of game and furbearing mammals
- Adopt ordinances that ban the use of sharp picket style metal fences, which can injure wildlife
- Coordinate with waste management companies to provide bear-proof trash containers when needed
- Encourage the use of wildlife-proof fencing to protect high value gardens and landscaping
- Encourage annual inspection of structures by residents to prevent their use by wildlife species

### **Future Development**

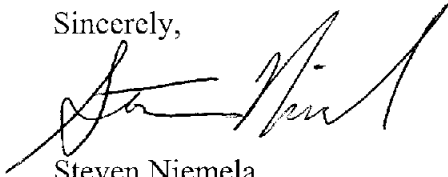
ODFW supports the retention of current zoning restrictions on residential development within resource lands incorporated into urban reserves. As mentioned previously, these lands provide a variety of ecological services to Jackson County in addition to their agricultural and economic benefits. Maintaining a low residential density will allow these lands to continue providing these important benefits, until they are incorporated into a UGB. Similarly, ODFW supports minimum lots sizes for non-resource lands. In general, the larger the lots size the greater the ability of the land to maintain proper ecological functioning.

ODFW encourages cities to utilize all available lands within current boundaries before expanding their UGB into urban reserves, and to consider planning actions that retain ecological

functions, provide habitat for fish and wildlife species, and minimize wildlife damage. We request that ODFW be given an opportunity to review plans and provide comment as UGB expansion projects move forward.

If there are any questions or concerns about these comments, please contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Steven Niemela". The signature is fluid and cursive, with a long horizontal stroke extending to the left.

Steven Niemela  
Assistant District Wildlife Biologist



# ROGUE VALLEY SEWER SERVICES

Location: 138 West Vilas Road, Central Point, OR - Mailing Address: P.O. Box 3130, Central Point, OR 97502-0005  
Tel. (541) 664-6300, Fax (541) 664-7171 www.RVSS.us

May 7, 2010

To: Craig Anderson, Jackson County Development Services  
From: Carl Tappert, PE

## RE: Regional Problem Solving Plan

In 2006 Rogue Valley Sewer Services prepared a study detailing the ability of the existing sanitary sewer collection system to serve the proposed growth areas. Rogue Valley Sewer Services is prepared to provide service to any area within our district boundaries that are approved for development.

All of the proposed growth areas would require sewer main construction to extend from the existing system and within the growth area. In addition to this construction, some of the areas would require major improvements to the existing system, pump stations, or other major offsite improvements.

There were a total of 39 growth areas reviewed. Eight of these were further subdivided into two or more drainage basins bringing the total number of basins analyzed to 49. Of these, 33 could be served with no major offsite improvements. Of the remaining 16 basins, 10 would require improvements to the existing collection system; 4 would require construction of a regional pump station; and 7 would require development of an adjacent growth area before they could be developed. Additionally, three of the growth areas would be served through the collection system for the City of Medford. Our analysis only included the impact these areas would have on the regional interceptor system and did not analyze the capacity of the Medford collection system. Some of the growth areas require more than one major improvement.

Total Basins Analyzed	49
No major offsite construction required	33
Improvements to existing collection system required	10
Regional Pump Station Required	4
Development of Adjacent Growth Area required	7
Served through Medford Collection System	3

Jackson County Planning Commission

File No. LRP2009-00010 Exhibit # 39

Offered by: Carl Tappert

Date: 5.12.2010 Received by: Pg

-316-

The table below summarizes RVS' recommendations for the proposed growth areas:

Growth Area	Conditions
Eagle Point – 1A	No Major Improvements
Eagle Point – 2	Requires improvement of 2,400 feet of existing sewer
Eagle Point – 3 (North)	No Major Improvements
Eagle Point – 3 (South)	Requires regional pump station. Dependent upon development of adjacent Area 4
Eagle Point - 4	Requires regional pump station. Requires improvement of 6,500 feet of existing sewer
Central Point – 1B (West)	Requires improvement of 1,200 feet of existing sewer
Central Point – 1B (East)	No Major Improvements
Central Point – 1B (Tolo)	Requires regional pump station
Central Point – 2B	No Major Improvements
Central Point -3	No Major Improvements
Central Point – 4D	No Major Improvements
Central Point - 5	No Major Improvements
Central Point - 6A	No Major Improvements
Central Point - 8	No Major Improvements
Medford – 1 (North)	Requires replacement of STE system currently serving area.
Medford – 1 (Southwest)	Requires improvement of 4,000 feet of existing sewer
Medford – 1 (Southeast)	Dependent upon development for Southwest portion of Medford Area 1 Requires improvement to existing pump station. Requires improvement of additional 2,300 feet of existing sewer
Medford – 2 (South)	No Major Improvements
Medford – 2 (North)	Dependent upon development for Southeast portion of Medford Area 1. Requires improvement of additional 2,600 feet of existing sewer.
Medford – 3 (West)	Requires improvement of 4,000 feet of existing sewer. Requires adjustment of service area boundary between Medford and RVS
Medford – 3 (East)	Medford collection system was not analyzed.
Medford - 4	Medford collection system was not analyzed.
Medford - 5 (South)	No Major Improvements
Medford – 5 (North)	Medford collection system was not analyzed.
Medford - 6	No Major Improvements
Medford – 7 (East)	No Major Improvements
Medford – 7 (West)	Requires improvement of 1,700 feet of existing sewer
Medford - 8	No Major Improvements

Medford - 9	No Major Improvements
Jacksonville - 1	No Major Improvements
Jacksonville - 2	Dependent upon development of Jacksonville Area 1
Jacksonville - 3	No Major Improvements
Jacksonville - 4	Dependent upon development of Jacksonville Area 1
Jacksonville - 5	No Major Improvements
Jacksonville - 6	Dependent upon development of Jacksonville Area 1 and 4
Jacksonville - 8	No Major Improvements
Jacksonville - 10	No Major Improvements
Phoenix - 1	Requires improvement of 500 feet of existing sewer, including Highway 99 crossing.
Phoenix - 2	No Major Improvements
Phoenix - 3	No Major Improvements
Phoenix - 5	No Major Improvements
Phoenix - 9 (West)	No Major Improvements
Phoenix - 9 (East)	Dependent upon development of Phoenix Area 1
Phoenix - 10	No Major Improvements
Talent - 1	No Major Improvements
Talent - 2	No Major Improvements
Talent - 3	No Major Improvements
Talent - 4	No Major Improvements
Talent - 5	No Major Improvements

-318-

Carl  
Tappert

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GREATER BEAR CREEK  
REGIONAL PROBLEM SOLVING PROCESS

ROGUE VALLEY SEWER SERVICES  
COMMENTS

August 2, 2006

Prepared by:

Carl Tappert, PE  
District Engineer



*Expires 6/30/10*

## EXECUTIVE SUMMARY

The NOWX2 Greater Bear Creek Regional Problem Solving Process is an attempt by local agencies to effectively plan for the doubling of the regions population. As a regional sewer service provider, Rogue Valley Sewer Services is charged with the responsibility to ensure that adequate sewer capacity is available to serve the proposed growth areas, thus we welcome and encourage to long range planning that is occurring.

These comments apply to collection and transmission of sewage only. Sewage treatment is done at the regional treatment facility which is operated by the City of Medford. This report is our best analysis at this time. Predictions of future growth are, by their very nature, uncertain. Unforeseen growth patterns may require additional sewer improvements not identified in this plan.

Estimated sewage flow from proposed growth areas was injected into a computer model of the sewer system. The results indicate the extent of improvements needed to the existing system needed to accommodate the growth. Out of 39 growth areas proposed, 25 received unconditional recommendations meaning that they could be served with little or no improvement to the existing sewer system. Seven areas received conditional recommendations meaning that sewer service would require one or more of the following: significant improvements to the existing system; construction of a regional pump station; prior development of an adjacent growth area. The final seven areas received partial recommendations meaning that the area can be divided into separate drainage basins, at least one of which earned a conditional recommendation.

The model analysis highlighted capacity deficiencies in the Old Medford Trunk, White City Trunk, Jacksonville Trunk, and in the main line on Highway 99 in Talent. All of these areas are already identified in the RVS Capital Improvement Plan. Because of this and the fact that they serve multiple growth areas, these deficiencies are not considered limiting for any growth areas.

One potential concern is the Industrial areas. Industrial flow estimates are based on average flows from existing customers within the RVS system. Industrial flows are extremely variable and a single large user could significantly affect the accuracy of this analysis. It is presumed that any large industrial uses will be further evaluated at the time of development to determine the extent of the impact on the sewer system.

Virtually all of the growth areas will require both on-site and off-site sewer construction. It is presumed that this construction will be sized appropriately and designed to facilitate future development.

Where gravity flow is not possible service will be provided with a regional pump station. In certain cases RVS may allow the construction of a smaller pump station to accommodate the sequence of development. In these cases, the pump station will be designed so that it can be easily removed when the regional pump station is constructed.

### Analysis Methodology

The Rogue Valley Sewer Services operates a system of over 350 miles of pipe to collect waste from the cities of Talent, Phoenix, Medford, Jacksonville, Central Point, White City and Eagle Point and transmit it to the regional treatment facility on Kirtland Road. Wastewater flows in the system are monitored by a series of 12 permanent flow monitoring stations and 12 portable flow monitors.

The entire collection system is modeled using Hydra software designed by Pizer, Inc. This modeling program calculates the capacity of each section of pipe based on pipe size, material, and slope. System flows are added to the program and calibrated based on actual flow monitoring data. For the purpose of analysis, flows are projected to a five-year peak flow during wet weather months using a statistical analysis that translates to a 3.3% probability of the peak flow occurring during the month.

Once the model has been calibrated the anticipated flows from the proposed growth areas are added to the system. The flows are based on the following parameters:

- Residential flow – 200 gallons per day per house
- Commercial Flow – 750 gallons per day per acre
- Industrial Flow – 1,500 gallons per day per acre

The flows are injected into the system at the closest downstream pipe. In many cases, the topography of the growth area requires that flows be directed into two or more sewage drainage basins. Some growth areas do not have access to a gravity sewer and will require a regional pumping station to provide service.

### Growth Area Recommendation Criteria

All of the growth areas identified in the report can be served by Rogue Valley Sewer Services. The key consideration is the extent to which the existing system would need to be improved to accommodate the growth. Areas that can be served with little or no improvement to the existing sewer system receive an unconditional recommendation. Other areas receive a conditional recommendation with conditions detailing the extent of the improvements needed to accommodate growth. Areas that will require a regional pumping facility or that are dependent upon development of another growth area will also receive a conditional recommendation.

The table below summarizes RVS' recommendations for the proposed growth areas:

Growth Area	Recommendation	Conditions
Eagle Point – 1A	Unconditional	
Eagle Point - 2	Conditional	Requires improvement of 2,400 feet of existing sewer
Eagle Point – 3 (North)	Unconditional	

Eagle Point - 3 (South)	Conditional	Requires regional pump station. Dependent upon development of adjacent Area 4
Eagle Point - 4	Conditional	Requires regional pump station. Requires improvement of 6,500 feet of existing sewer
Central Point - 1B (West)	Conditional	Requires improvement of 1,200 feet of existing sewer
Central Point - 1B (East)	Unconditional	
Central Point - 1B (Tolo)	Conditional	Requires regional pump station
Central Point - 2B	Unconditional	
Central Point - 3	Unconditional	
Central Point - 4D	Unconditional	
Central Point - 5	Unconditional	
Central Point - 6A	Unconditional	
Central Point - 8	Unconditional	
Medford - 1 (North)	Conditional	Requires replacement of STE system currently serving area.
Medford - 1 (Southwest)	Conditional	Requires improvement of 4,000 feet of existing sewer
Medford - 1 (Southeast)	Conditional	Dependent upon development for Southwest portion of Medford Area 1 Requires improvement to existing pump station. Requires improvement of additional 2,300 feet of existing sewer
Medford - 2 (South)	Unconditional	
Medford - 2 (North)	Conditional	Dependent upon development for Southeast portion of Medford Area 1. Requires improvement of additional 2,600 feet of existing sewer.
Medford - 3 (West)	Conditional	Requires improvement of 4,000 feet of existing sewer. Requires adjustment of service area boundary between Medford and RVS
Medford - 3 (East)	Unconditional	Medford collection system was not analyzed.
Medford - 4	Unconditional	Medford collection system was not analyzed.
Medford - 5 (South)	Unconditional	
Medford - 5 (North)	Unconditional	Medford collection system was not analyzed.
Medford - 6	Unconditional	
Medford - 7 (East)	Unconditional	
Medford - 7 (West)	Conditional	Requires improvement of 1,700 feet of existing sewer
Medford - 8	Unconditional	

Medford - 9	Unconditional	
Jacksonville - 1	Unconditional	
Jacksonville - 2	Conditional	Dependent upon development of Jacksonville Area 1
Jacksonville - 3	Unconditional	
Jacksonville - 4	Conditional	Dependent upon development of Jacksonville Area 1
Jacksonville - 5	Unconditional	
Jacksonville - 6	Conditional	Dependent upon development of Jacksonville Area 1 and 4
Jacksonville - 8	Unconditional	
Jacksonville - 10	Unconditional	
Phoenix - 1	Conditional	Requires improvement of 500 feet of existing sewer, including Highway 99 crossing.
Phoenix - 2	Unconditional	
Phoenix - 3	Unconditional	
Phoenix - 5	Unconditional	
Phoenix - 9 (West)	Unconditional	
Phoenix - 9 (East)	Conditional	Dependent upon development of Phoenix Area 1
Phoenix - 10	Unconditional	
Talent - 1	Unconditional	
Talent - 2	Unconditional	
Talent - 3	Unconditional	
Talent - 4	Unconditional	
Talent - 5	Unconditional	