

# ATTACHMENT I

Received by  
City of Coburg  
APR 06 2020

## Property Owner Testimony

Re: City of Coburg Land Use Proposal Application number: SUB-01-20; Request: Subdivision – 39 new lots; Property Location: Assessor’s Map 16-03-28-00 Tax Lot 00501  
March 28, 2020

To whom it may concern:

Inserted below are several criteria from the City of Coburg Development Code, which are pertinent to the proposed subdivision:

### **ARTICLE VII. DISTRICT REGULATIONS**

#### **A. Traditional Residential District (TR)**

**1. Purpose:** *The Traditional Residential District is intended to provide a livable neighborhood environment, preserve the small town and historic character of the traditional core of Coburg, ensure architectural compatibility, and provide for a variety of residential housing choices and other associated uses as determined to be desirable and/or necessary.*

### **ARTICLE VIII. SUPPLEMENTARY DISTRICT REGULATIONS** *Public access ways.*

#### **E. Streets, Alleys and Other Public Way Standards**

##### **3. Additional Street Standards**

*f. Public access ways. When necessary for public convenience and safety, the Planning Commission may require the land divider to dedicate to the public access ways to connect cul-de-sacs, to pass through oddly shaped or unusually long blocks, to provide for networks of public paths according to adopted plans, or to provide access to schools, parks or other public areas, of such design, width and location as reasonably required to facilitate public use.*

### **ARTICLE XII. LAND DIVISIONS AND PROPERTY LINE ADJUSTMENTS**

#### **C. Tentative Approval**

##### **2. Subdivisions (non-phased)**

###### *c. Approval Criteria.*

*(5) Proposal contributes to the orderly development of the City’s area transportation network of roads, bikeways, and pedestrian facilities, and allows for continuation and expansion of existing public access easements within or adjacent to the subdivision.*

The tentative site map of the proposed 39 lot subdivision currently reflects only two ingress/egress points, both at the south side of the property. These proposed connections to two existing City of Coburg streets, namely N. Coleman and N. Skinner Streets, will increase the traffic flow on the existing northern-most block of N. Coleman, eastern-most block of E. Locust, and northern-most block of N. Skinner by roughly 200% to 400% (2 to 4 times). The aforementioned streets and blocks are all located in Coburg’s historic traditional residential core.

This level of increase in traffic will degrade the livable, small town and historic character of the traditional Coburg core, which among other things, is characterized by light to moderate vehicle traffic. The level of increase is also detrimental to safety, given the multi-modal (cars, bikes, pedestrians) use of N. Coleman, N. Skinner, and E. Locust. In particular, E. Locust, situated on the north edge of the community’s primary City park, is heavily traveled by bikes and pedestrians. The proposal is also detrimental to the orderly development of the City’s transportation network of roads, in that there are

proposed connections to only two streets in the City's network, whereas there are at least two additional City streets extending from the proposed subdivision to the southwest and west.

Thus, in order to comply with the criteria set forth in the code, the current design needs to be modified. One such needed modification is to designate additional street connections in order to dilute the new traffic across Coburg's current residential street network. Disbursing traffic more evenly will lessen the impact to any one individual block or street.

The most feasible additional current street connections include W. Van Duyn and Macy Streets, to the southwest and west of the proposed subdivision. These connections would require Coburg to reverse prior decisions regarding right of way access, however, in order to protect the character of and safe and orderly traffic throughout the traditional residential district and park blocks as a whole, the City should pursue this.

Further to the traffic resulting directly from this current subdivision application, the proposed site map indicates future street connections on the north side of the property to potential future subdivisions, but still only indicates connections to the existing Coburg street network at N. Skinner and N. Coleman. In other words, this proposal, on its face, indicates the potential to bring additional subdivisions online that all feed only N. Skinner (to E. Locust and the park) and N. Coleman. This would result in an increase to traffic on the aforementioned streets by 4 to 8 times if a second 40 home subdivision were added, 8 to 16 times for a third, and so on.

While a traffic increase of 2 to 4 times is detrimental to the historic core's character, safety, and orderly traffic network, the potential future traffic from additional subdivisions would devastate it. Thus, to comply with the code, the site plan would need to be modified to recognize and mitigate the potential for future through traffic.

Given the significant magnitude of potential traffic as described above, the modification needs to require an explicit notation on the site plan indicating the intention for a future connection between the streets proposed within the subdivision, and the probable future street network, if/when it comes online, which includes extensions of N. Harrison and N. Willamette Streets. This probable future street network to the north and northwest of the historic Coburg residential core, is envisioned to come online, as triggered by a land use application to subdivide and/or develop land located either to the north of this current proposed site plan, and/or other currently-developed land on the north side of Coburg.

Finally, in the interest of safety, either as a part of this land use application, or on its own, the City of Coburg should install traffic calming on the streets most impacted by this land use proposal. The City should consult with nearby property owners to align on the traffic calming that is most suitable and desirable for each street block where calming is deemed appropriate.

In addition to the Coburg Development Code language inserted at the beginning of this testimony, the additional code language inserted below is also pertinent to the proposed land use application and corroborates the aforementioned arguments in favor of modifying the proposal.

**ARTICLE VIII. SUPPLEMENTARY DISTRICT REGULATIONS** *Public access ways.*

*F. Other Public Improvements*

**4. Dedications.** *As a condition of any development, the City may require dedication and improvement of public ways for automobile, bicycle and pedestrian use; easements for water, wastewater, and stormwater infrastructure; easements for utilities; dedication of open space; and dedication for other public purposes.*

**ARTICLE XI. LAND USE REVIEW AND SITE DESIGN REVIEW**

*C. Land Use Review Procedure and Approval Criteria*

**4. The Planning Official or Commission must also consider the following criteria:**

*g. That, based on anticipated traffic generation, adequate additional transportation improvements must be provided by the development in order to promote traffic safety and reduce traffic congestion, including but not limited to right-of-way and road improvements. Consistent with the Transportation System Plan, consideration shall be given to the need and feasibility of widening and improving abutting streets and also to the necessity for such additional requirements as lighting, traffic-calming techniques, sidewalks and other pedestrian ways, bikeways, and turn and deceleration/acceleration lanes.*

**ARTICLE XII. LAND DIVISIONS AND PROPERTY LINE ADJUSTMENTS**

*Purpose and Applicability*

*The purpose of this chapter is to:*

- 3. Encourage efficient use of land resources, full utilization of urban services, and transportation options.*
- 4. Promote the public health, safety and general welfare through orderly and efficient urbanization.*
- 5. Provide adequate light and air, prevent overcrowding of land, and provide for adequate transportation, water supply, sewage, fire protection, pollution control, surface water management, and protection against natural hazards;*

Respectfully,



Cathy Engebretson and Daniel Rux  
32703 E Locust Street  
Coburg, Oregon 97408

*Keela + Paul Coelhs  
91153 N. Skinner St.  
Coburg, OR 97408*