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March 8, 2010

Via: E-mail & Regular US Mail

Department Of Land Conservation
And Development
Attn: Richard Whitman, Director
635 Capitol St., Ne, Suite 150
Salem, Or 97301-2540

Re: DLCD Order No.: 001775
Report on Bend and Deschutes County's Amendment to Bend Urban
Growth Boundary Dated January 8, 2010

BEND

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Dear Mr. Whitman:

This office represents the Bend Metropolitan Parks and Recreation District (the "District"). The purpose of this letter is to file a written exception to the Department's report.

Under an Intergovernmental Agreement (IGA) with the City of Bend, the District is designated the urban services provider for the planning and delivery of park and recreation services within the Bend UGB. The District's adopted 2005 Parks Recreation and Green Spaces Comprehensive Plan (Comprehensive Plan) includes target standards for the delivery of various classifications of park and trail facilities based upon acres and miles per thousand residents. The Comprehensive Plan is incorporated by reference in Chapters 2 and 3 of the City of Bend Urban Area General Plan as providing the target standards for park and trail service within the Bend UGB.

In January 2006, the District calculated and submitted to the city of Bend the future need for neighborhood and community parks within the proposed expanded Bend UGB based solely upon the Comprehensive Plan target standards and the 2028 population estimate used by the city. The resultant estimate of future park and trail need based upon the combined neighborhood and community park target standard of seven acres per thousand and the population estimate was 362 acres. The original estimate was not tied to any particular UGB expansion scenario or map, but rather based on estimated population growth within the entire expanded UGB.

On November 24, 2008, the district submitted a revised estimate of future park need based upon the earlier estimate described above and a quadrant based location analysis of future park and trail need. Attached (Record at 2724-7). Based on the Comprehensive Plan standards, community parks provide service to specific quadrants (areas) of the District. An excess of developable Community Park land in the NE quadrant of Bend will not provide future service to those living in the other three quadrants. The revised need was calculated to be 474 acres. Neither the original, nor the revised estimate of future need proposed that all future park lands would be located outside the current UGB.

The Comprehensive Plan target level of service (LOS) standards for neighborhood and community parks as well as trails were used to establish the gross estimate of future park and trail need. Figure 1 shows the gross estimate of future need for each element solely based upon an adjusted 2028 city-estimated population forecasted increase of 38,512.

Figure 1 **Estimated Gross Park Need**

	BMPRD Comp Plan Target	Future Need (acres)
Neighborhood Parks	2 acres/1,000	77 acres
Community Parks	5 acres/1,000	193 acres
Trails	2.4 acres/1,000	92 acres
Total acres needed		362 acres

During the hearing process, the District stated that although preliminary framework planning for water, sewer, and transportation infrastructure had been done by the city, no such planning for parks based upon locational standards in the District's Comprehensive Plan had as yet been done. The District also discussed the need for more refined, location-based, framework planning of future park and trail need on numerous occasions with the TAC. The District understood that the additional planning could not be completed until the UGB boundary and proposed land uses (zoning) were established. Subsequent to the November 2008 City Council work session, the District met with city staff and was supplied with new "quadrant-based" population data necessary to complete refined park and trail framework planning.

Quadrant based framework plan identified gaps in service area for community parks. Because the original estimate (362 acres) of future park need was made prior to the release of the June 2008 draft UGB map, which included final draft boundaries and zoning designations, no park locational planning had been done. It was anticipated that more refined, quadrant-based planning would be done upon release of the UGB map, and that it might lead to a modification of

the number of predicted acres needed for future park and trail development. The quadrant-based location planning has been referred to in the record as the “park framework plan”.

The park framework plan functions to ensure that adequate neighborhood and community park amenities are efficiently and equitably distributed about the entire UGB pursuant to the Bend Urban Area General Plan and the District’s Comprehensive Plan. In order to achieve equitable distribution, it is particularly important to refine the future park need based upon “locational criteria” included in the Comprehensive Plan.

Community parks have service radii of 1 to 2 miles and the relevant location criteria are:

- Individual community parks should be centrally located in the portion of the community being served;
- Some community parks may be designed and located so as to server the entire community;
- Collectively, community parks should be strategically located and uniformly dispersed throughout the community. The service area for community parks is important to help reduce vehicle miles traveled by park users.

Typically, with the exception of the larger sites along the Deschutes River, community parks are located to serve specific areas of the District; therefore the UGB was divided into quadrants in order to further analyze future community park need.

The quadrants can be further divided into Park Service Areas used by the district to identify the equitable distribution of Neighborhood parks which have service radii of 0.25 to 0.5 miles. The relevant location criteria for these parks are:

- Located as central as possible to the neighborhood which it serves;
- Conveniently accessible within 10 – 15 minutes travel time on foot.

For example, a neighborhood park located in one service area does not effectively serve residents of the others. As with community parks, calculating only the gross level of service needed, as was done with the initial 2006 analysis, does not effectively reveal localized service deficiencies. The District does not assume that all parks need to be in the expanded UGB. However, most if not all parks are developed on residentially-zoned land and therefore it is safe to assume that any parks developed within the current UGB will displace residential uses and force a commensurate amount of housing into the expanded UGB

With the release of the 2008 UGB map and with the population data for each quadrant provided by city staff, the District was able to proceed with park framework planning. The quadrants used in the framework plan analysis were defined as either east or west of US 97 (the Bend Parkway) and; as either north or south of US 20 – Greenwood/Newport Avenues – Shevlin Park Rd. Figure 2 shows the net future park and trail need in each of the four expanded UGB quadrants.

Figure 2 Net Future Park and Trail Need at Build-out by Quadrant

Population at Build-out:	Total UGB	Per Quadrant			
	118,335	18,350	38,275	30,279	31,432
NEIGHBORHOOD PARKS	Acres	NW	NE	SW	SE
Developed Neighborhood Park acres:	97	29	28	30	10
Undeveloped Neighborhood Park acres:	34	0	18	10	6
Existing Neighborhood Park total acres:	131	29	46	40	16
Additional net Neighborhood Park acres needed to meet 2ac./1,000 target:	105	7	31	20	47
COMMUNITY PARKS	Acres	NW	NE	SW	SE
Developed Community Park acres:	245	5	109	80	51
Undeveloped Community Park acres	184	0	151	0	33
Existing Community Park total acres: ¹	429	5	260	80	84
Additional net Community Park acres needed to meet 5ac./1,000 target:	231	87	0²	71	73
TRAILS	Miles/Acres	NW	NE	SW	SE
Existing Trail Miles	61	9.0	5.9	40.4	5.5
Trail Acres (20' wide ROW = 2.4 ac./mile)	146	22	14	97	13
Additional net Trail acres needed to meet 2.4ac./1,000 target:	138	22	78	-24³	62
Total Additional net Park and Trail Acres Needed:	474	117	108	67	183

¹ Community River Parks that do not provide the full range of basic community park amenities have been adjusted out. (See BMRD Comprehensive Plan, Community River Parks, pg. 7-16)

² While the analysis shows an excess of 69 acres of community park service in the NE quadrant, this service cannot be distributed to other quadrants and therefore it is not deducted from the total net need.

³ A large amount of the Deschutes River Trail which serves the entire community is located within the SW Quadrant. Therefore this excess river trail acreage has been deducted from the net trail need.

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The 474 net acres of park and trail need shown in the quadrant-based analysis demonstrates that locational factors will significantly influence the prediction of future need within the expanded UGB. This is particularly true for community parks where the excess of existing capacity in the NE quadrant cannot be practically redistributed to the other three quadrants. It is also true for neighborhood parks because of their much smaller service areas. The combined net need for neighborhood and community park acres when determined by quadrant is 335 acres (Figure 2) as compared to 270 gross acres shown in the earlier analysis (Figure 1).

The District is willing to provide additional information on Remand, if necessary.

Sincerely,



Sharon R. Smith
smith@bljlawyers.com

Encl.

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November 24, 2008

Via: E-mail and Hand Delivery

BEND CITY COUNCIL
DESCHUTES COUNTY COMMISSION
c/o Damian Syrnyk, AICP, Senior Planner
City of Bend
710 NW Wall Street
Bend, OR 97701

**RE: Park and Trail Framework Plan
Urban Growth Boundary (UGB) Amendment
City of Bend Planning File No. PZ 07-361**

The Bend Metro Park and Recreation District ("District") has been working closely with the City and County Staff throughout the UGB planning process.

Land Needs Estimate

Based on the UGB population forecast and adopted target levels of service ("LOS") in the District's 2005 Park, Recreation and Greenspaces Comprehensive Plan ("Comprehensive Plan"), the gross need for future park and trail need, within the expanded UGB was estimated at 362 acres.

Park and Trail Framework Plan

The District's Comprehensive Plan target LOS standards for neighborhood and community parks as well as trails were used to establish the gross (i.e. non-locational) estimate of future park and trail need. Figure 1. shows the gross estimate of future need for each class of facility based upon an adjusted 2028 population forecasted increase of 38,512.

Figure 1. Estimated Gross Park Need

Facility Class	Comp Plan Target LOS	Future Need (acres)
Neighborhood Parks	2 acres/1,000	77 acres
Community Parks	5 acres/1,000	193 acres
Trails	2.4 acres/1,000	92 acres
Total acres needed		362 acres



Because the gross estimates of future park need were made prior to the release of the October 10, 2008 Alternative 4 UGB map (later reiterated), which included final draft boundaries and zoning designations, no park location planning had been done. More refined, quadrant-based planning has now been done by the City and District Staff. This quadrant-based location planning has been previously referred to in the record as the "park framework plan".

The park framework plan will function to ensure that adequate neighborhood and community park amenities are efficiently and equitably distributed about the entire UGB pursuant to the Bend Urban Area General Plan and the District's Comprehensive Plan. It is critical to refine the future park need based upon "location criteria" included in the Comprehensive Plan.

Community parks have service radii of 1 to 2 miles and the relevant location criteria are:

- Individual community parks should be centrally located in the portion of the community being served;
- Some community parks may be designed and located so as to serve the entire community;
- Collectively, community parks should be strategically located and uniformly dispersed throughout the community.

Typically, with the exception of the larger sites along the Deschutes River, community parks are located to serve specific areas of the District. Therefore the UGB was divided into quadrants.

Neighborhood parks have service radii of $\frac{1}{4}$ to $\frac{1}{2}$ miles and the relevant location criteria are:

- Located as central as possible to the neighborhood which it serves;
- Conveniently accessible within 10 – 15 minutes on foot.

Because neighborhood parks serve much smaller areas than community parks, their distribution and total net need is not as sensitive to the quadrant based analysis. However, the analysis can reveal the equity of neighborhood park service across the District and can help refine overall future need. Calculating only the gross level of neighborhood park service needed does not effectively reveal localized service deficiencies. Final locations of future neighborhood parks in the new UGB areas will be largely determined through the development process pursuant to policies and analysis in the District's Neighborhood Parks Plan, an element of the Comprehensive Plan.

With the release of the UGB map and with the population data for each quadrant the District along with City Staff's assistance has begun park framework planning. The quadrants used in the framework plan analysis are defined as either east or west of Hwy 97 (the Bend Parkway) and; as either north or south of the Hwy 20 – Greenwood/Newport Avenue – Shevlin Park Rd line. Figure 2 shows the net future park and trail need in each of the four expanded UGB quadrants.

Figure 2. Net Future Park and Trail Need at Build-out by Quadrant

Population at Build-out	Total UGB:	118,335				
- Per Quadrant:			18,350	38,275	30,279	31,432
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Additional net Trail acres needed to meet 2.4ac./1,000 target:	138		22	78	-24³	62

Figure 3 shows the net total acres needed for parks and trails within the entire future UGB and within the individual quadrants.

Figure 3. Net Park and Trail Acres Needed

	UGB	NW	NE	SW	SE
Total additional net Park and Trail Acres Needed:	474	117	108	67	183

It is our understanding from discussions with the City Staff, that this information in Figures 2 and 3 will be added to the adopted UGB Framework Plan Map

Analysis and Conclusion

The 474 net acres of park and trail need shown in the quadrant-based analysis demonstrates that locational factors significantly impact future needs within the expanded UGB. This is particularly true for community parks where the excess 69 acres of existing capacity in the NE quadrant cannot be practically redistributed to the other three quadrants. It is also true for

¹ Community River Parks that do not provide the full range of basic community park amenities have been adjusted out. (See BMRPD Comprehensive Plan, Community River Parks, pg. 7-16)

² While the analysis shows an excess of 69 acres of community park service in the NE quadrant, this service cannot be distributed to other quadrants and therefore it is not deducted from the total net need.

³ A disproportionate amount of the Deschutes River Trail which serves the entire community is located within the SW Quadrant. This excess river trail acreage has been deducted from the net trail need.

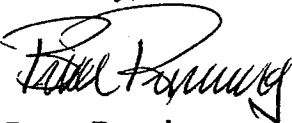
neighborhood parks because of their much smaller service areas. The combined need for neighborhood and community park acres when determined by quadrant is 336 net acres as compared to 270 gross acres shown in the earlier analysis. However, the overall need for residential lands includes 327 surplus acres, some of which might be used to accommodate the additional 66 acres of park need identified in the quadrant-based analysis.

The overall, 474 acre quadrant-based prediction of park and trail need is also somewhat skewed by the large amount of future trail acreage identified. Some of the needed trail right-of-way will be acquired in fee title and therefore will decrease the total of buildable acres in the expanded UGB. Other future trail acres, however, may be accommodated on easements across otherwise buildable parcels and therefore should not be deducted from the overall total of available acres. In addition, a significant portion of future trail routes follow canal ditch roads that are otherwise accounted for in the provision for 15% open space in the overall UGB land need. While it is impossible to say exactly how much of the predicted need for trail acreage is excessive, it seems safe to assume that the quadrant-based analysis results in some over prediction of combined park and trail need. It appears from the framework plan analysis that 362 acres of gross park and trail need may be sufficient although the quadrant-based prediction shows a greater need.

Recommendation

The District recommends retaining the 362 acres estimate of future park and trail need within the UGB. It will be necessary to review particular UGB areas as they are proposed for annexation in order to ensure that adequate parks and trails are provided for future users. The General Plan and Development Code amendments submitted jointly by the Bend Metro Park and Recreation District and the Bend La Pine School District are critical in facilitating implementation of the park and trail framework plan.

Sincerely,



Bruce Ronning
Director of Planning and Development

c: City of Bend and Deschutes County Planning Staff