



LAND USE PLANNING AND CONSULTING SERVICES

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## Memorandum:

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### Substantive: Fairway Estates Phase II PUD/Subdivision Application

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Date: February 3, 2023  
To: City of Florence, Planning Department  
From: Metro Planning, Inc.  
Subject: Substantive Comments for PC 21 39 SUB 03 & PC 21 40 PUD 02

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Agency File No.: PC 21 39 SUB 03 & PC 21 40 PUD 02  
Agency Contact: Wendy Farley Campbell, Planning Director, AICP  
Determination: March 25, 2022  
1<sup>st</sup> 120 Day Rule Waiver: **January 4, 2023**  
2<sup>nd</sup> 120 Day Rule Waiver: **May 4, 2023**

Property Owner/Applicant: Joseph M. Pearson, Pacific Golf Communities LLC  
PO Box 3094  
Florence, OR 97439

Subdivision Name: Fairway Estates Phase 2  
Map/Lot: 18-12-15-00, TL 1500  
Site Address: Florence Oregon 97439

Applicant File No.: 21-051 Pearson-Fairway  
Applicant's Rep: Jed Truett, AICP, Principal  
(jed@metroplanning.com)

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Wendy Farley Campbell,

This memo and attached material address substantive issues from the city, discussion and comments at the January Planning Commission meeting, discussion during our November 30<sup>th</sup> meeting with you and the Public Works Director, feedback regarding the September 2022 completeness submittal package, and from correspondence related to the initial application package submitted January of 2022.

Below, city code and substantive review comments (notes) are in ***bold italics*** or enclosed in boxes. Applicant responses are in plain text.

A cross reference table is provided on the last page of this document to cross reference footnoted attachments with electronic file submittals.

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## 1. Comments from Michael Schick, Fire Chief, City of Florence Emergency Turnaround and Hydrants

1. Will the entire road through the planned development be completed or is the plan just to complete the road to the end of the Phase II development resulting in a dead end? If the road doesn't go all the way through we will require a turnaround. Road width is adequate. (He also provided D103.1 and D103.4 referenced below)<sup>1</sup>

### OFC, D103.4 Dead ends.

**DEAD-END FIRE APPARATUS ACCESS ROADS IN EXCESS OF 150 FEET SHALL BE PROVIDED WITH WIDTH AND TURNAROUND PROVISIONS IN ACCORDANCE WITH TABLE D103.4.**

**TABLE D103.4 REQUIREMENTS FOR DEAD-END FIRE APPARATUS ACCESS ROADS**

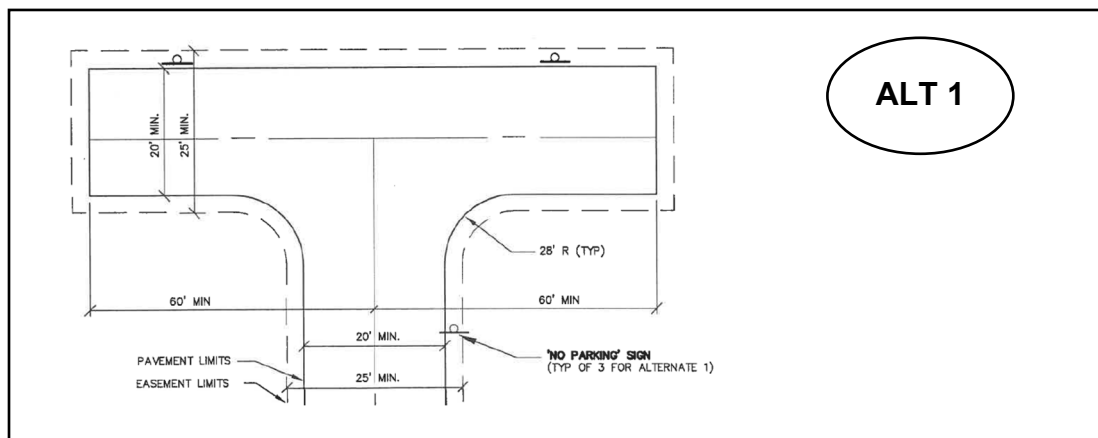
LENGTH (feet)	WIDTH (feet)	TURNAROUNDS REQUIRED
0–150	20	None required
151–500	20	120-foot Hammerhead, 60-foot "Y" or 96-foot diameter cul-de-sac in accordance with Figure D103.1
501–750	26	120-foot Hammerhead, 60-foot "Y" or 96-foot diameter cul-de-sac in accordance with Figure D103.1
Over 750		Special approval required

For SI: 1 foot = 304.8 mm.

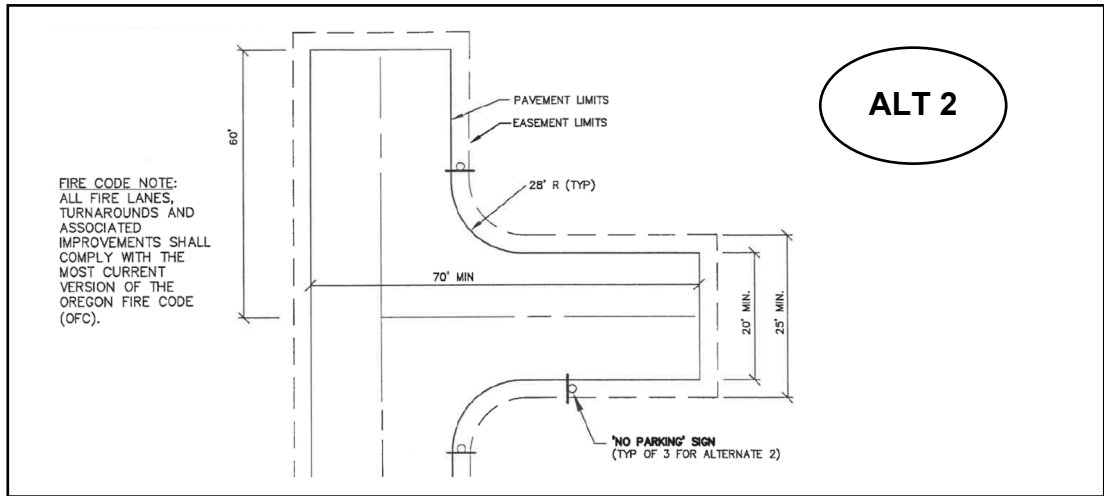
### OFC, Table D103.4 REQUIREMENTS FOR DEAD-END FIRE APPARATUS ACCESS ROADS

**120-FOOT HAMMERHEAD, 60-FOOT "Y" OR 96-FOOT DIAMETER CUL-DE-SAC IN ACCORDANCE WITH FIGURE D103.1**

Response: Any required phased development will comply with Florence City Code (FCC) and Oregon Fire Code (OFC) to support an emergency turnaround. Please see diagram below for proposed alternatives for dead-end turnaround for emergency access compliance.



<sup>1</sup> Attachment Fire Chief Email, October 4, 2022



A - Alt 1 and Alt 2 above from Oregon Fire Code: Alternatives - Hammerhead Emergency Turnaround

**Hydrant locations on Proposed Utility Plan will need to be updated. Current indicated locations will not provide an average spacing of 500 feet between hydrants and 250' from any point on the street to a structure. It looks like they may not have taken into account hydrants actually placed in the Phase I development.<sup>2</sup>**

**SECTION C102 NUMBER OF FIRE HYDRANTS C102.1 MINIMUM NUMBER OF FIRE HYDRANTS FOR A BUILDING. The number of fire hydrants available to a building shall be not less than the minimum specified in Table C102.1.**

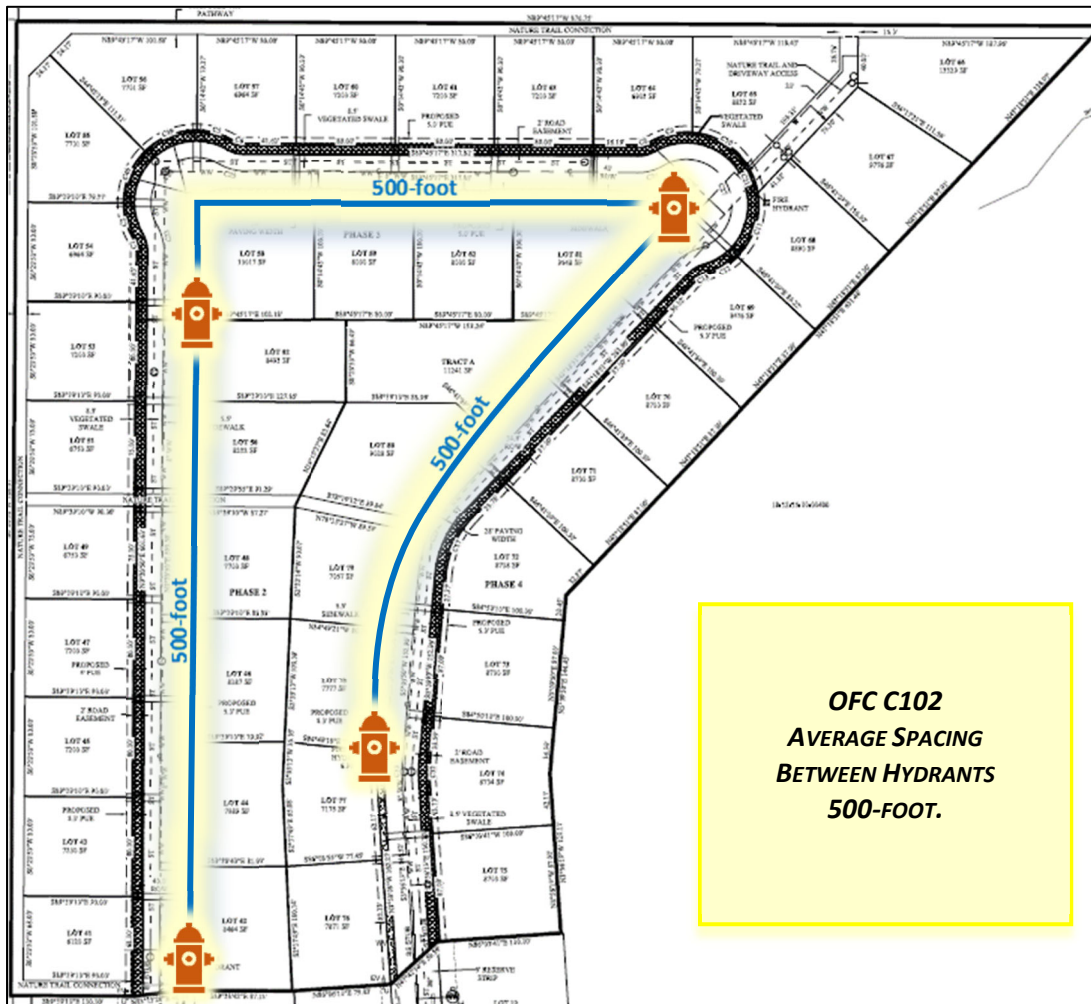
Response: Please see revised utility plans with hydrant locations, every 500-foot, and compliance with OCF Section C102.<sup>3</sup> Applicant is willing to loop the water main and add additional hydrants to help address issues raised below about secondary access.

FIRE-FLOW REQUIREMENT (gpm)	MINIMUM NUMBER OF HYDRANTS	AVERAGE SPACING BETWEEN HYDRANTS <sup>a,b,c,g</sup> (feet)	MAXIMUM DISTANCE FROM ANY POINT ON STREET OR ROAD FRONTAGE TO A HYDRANT <sup>d,f,g</sup>
1,750 or less	1	500	250
1,751-2,250	2	450	225
2,251-2,750	3	450	225
2,751-3,250	3	400	225
3,251-4,000	4	350	210
4,001-5,000	5	300	180
5,001-5,500	6	300	180
5,501-6,000	6	250	150
6,001-7,000	7	250	150
7,001 or more	8 or more <sup>e</sup>	200	120

For SI: 1 foot = 304.8 mm, 1 gallon per minute = 3.785 L/m.

<sup>2</sup> Attachment: Fire Chief Email, October 4, 2022

<sup>3</sup> Attachment: Fire Chief Email, Jan 12, 2023



**2. Comments from Michael Schick, Fire Chief, City of Florence**  
**Secondary Access Issues:**

*... the dilemma ... [is] ... Fairway ... Estates residents cannot use the emergency gate on Royal St. Georges but Sand Pines residents can? I guess it really depends on what did the city previously approve for the development. ... My recommendation is that all new homes have automatic sprinklers installed or a second access road on the north end of the development is put in place. This is all dependent on what Tony and the city agreed to previously. (He also provided D103.1 and D103.4 referenced below)*

**SECTION D107, ONE- OR TWO-FAMILY, RESIDENTIAL DEVELOPMENTS**

**D107.1 ONE- OR TWO-FAMILY DWELLING RESIDENTIAL DEVELOPMENTS. DEVELOPMENTS OF ONE- OR TWO-FAMILY DWELLINGS WHERE THE NUMBER OF DWELLING UNITS EXCEEDS 30 SHALL BE PROVIDED WITH TWO SEPARATE AND APPROVED FIRE APPARATUS ACCESS ROADS.**

**EXCEPTIONS:**

**1. WHERE THERE ARE MORE THAN 30 DWELLING UNITS ACCESSED FROM A SINGLE PUBLIC OR PRIVATE FIRE APPARATUS ACCESS ROAD AND ALL DWELLING UNITS ARE EQUIPPED THROUGHOUT WITH AN APPROVED AUTOMATIC SPRINKLER SYSTEM IN ACCORDANCE WITH SECTION 903.3.1.1, 903.3.1.2 OR 903.3.1.3, ACCESS FROM TWO DIRECTIONS SHALL NOT BE REQUIRED.**

**2. THE NUMBER OF DWELLING UNITS ACCESSED FROM A SINGLE FIRE APPARATUS ACCESS ROAD SHALL NOT BE INCREASED UNLESS FIRE APPARATUS ACCESS ROADS WILL CONNECT WITH FUTURE DEVELOPMENT, AS DETERMINED BY THE FIRE CODE OFFICIAL.**

**D107.2 Remoteness. WHERE TWO FIRE APPARATUS ACCESS ROADS ARE REQUIRED, THEY SHALL BE PLACED A DISTANCE APART EQUAL TO NOT LESS THAN ONE-HALF OF THE LENGTH OF THE MAXIMUM OVERALL DIAGONAL DIMENSION OF THE PROPERTY OR AREA TO BE SERVED, MEASURED IN A STRAIGHT LINE BETWEEN ACCESSES.**

**... My recommendation is that all new homes have automatic sprinklers installed or a second access road on the north end of the development is put in place. This is all dependent on what Tony and the city agreed to previously.**

Response: Owner seeks Planning Commission consideration and approval of proposal with exception to the secondary access issue raised at the last (January 2023) Planning Commission meeting and provides a valid petition that states the provision sought to be modified and facts showing that code provisions cause unique and unnecessary hardship and that proposed modifications of code provision would not be contrary to code purpose.

1. The current subdivision layout does not introduce a new scenario that triggers the compliance issue with “secondary access” requirement as identified above and in attachments<sup>4</sup>. This scenario was part of the original Sandpines PUD (proposed in 2003), and the same scenario that the Florence Planning Commission approved multiple times over multiple years. Raising this issue in January of 2023. This secondary access issue did not block approval for approximately 20 years of review and approval.

Previous approvals include, but are not limited to:

1. **January 13, 2004 - APPROVAL OF MODIFICATION TO THE SANDPINES PLANNED UNIT DEVELOPMENT, CITY OF FLORENCE PLANNING COMMISSION RESOLUTION 03-12-30-41<sup>5</sup>**
2. **September 27, 2005 – ADOPTED (SANDPINES) PLANNED UNIT DEVELOPMENT, CITY OF FLORENCE PLANNING COMMISSION RESOLUTION PUD 05 03<sup>6</sup>**
3. **July 24, 2007 – ADOPTED APPROVAL OF MODIFICATION TO CONDITIONS OF APPROVAL (TRANSPORTATION IMPROVEMENTS AND RHODODENDRON DRIVE IMPROVEMENTS) OF RESOLUTION PUD**

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<sup>4</sup> Attachment: Fire Chief Email, October 4, 2022

<sup>5</sup> Attachment: RESOLUTION 03-12-30-41

<sup>6</sup> Attachment: RESOLUTION PUD 05 03

**05 03 FOR RESIDENTIAL DEVELOPMENT AROUND SANDPINES GOLF COURSE, CITY OF FLORENCE PLANNING COMMISSION RESOLUTION PC 07 21 MOD 01<sup>7</sup>**

4. **September 23, 2008 - APPROVAL OF AMENDMENT OF THE APPROVED TENTATIVE SUBDIVISION OF SANDPINES PHASES 2 & 3, CITY OF FLORENCE PLANNING COMMISSION RESOLUTION PC 08 19 MOD 06<sup>8</sup>**
  5. **NOVEMBER 8, 2016 - APPROVAL OF AMENDMENT OF MODIFICATION TO SANDPINES PHASES (PUD) APPROVAL, CITY OF FLORENCE PLANNING COMMISSION RESOLUTION PC 16 21 PUD 01<sup>9</sup>**
  6. **MAY 22, 2018 - APPROVAL OF FINAL SUBDIVISION TO SANDPINES PHASES (PUD) APPROVAL, CITY OF FLORENCE PLANNING COMMISSION RESOLUTION PC 17 26 PUD 01<sup>10</sup>**
2. Applicant is proposing nearly the same number of buildable lots that were approved for development in the original PUD in areas north of the intersection with Rhododendron Drive. Under the original Sandpines PUD, these areas included 80 lots. With the current proposal and the existing approved lots in these areas, total count will be 81 lots. Please see maps below that highlight these areas on original PUD.
  3. APIC FLORENCE HOLDINGS LLC owns areas identified as C3, in the map below, and the adjacent golf course property. Should additional access to the east be required, both motive and ability would fall within the control of the golf course property owner, not the current owners of the site being proposed herein. Burdening the current owner/applicant is neither warranted nor achievable. Therefore, introducing and adhering to this standard now would not achieve the purpose of this regulation as applicant does not own properties where secondary access could be constructed.

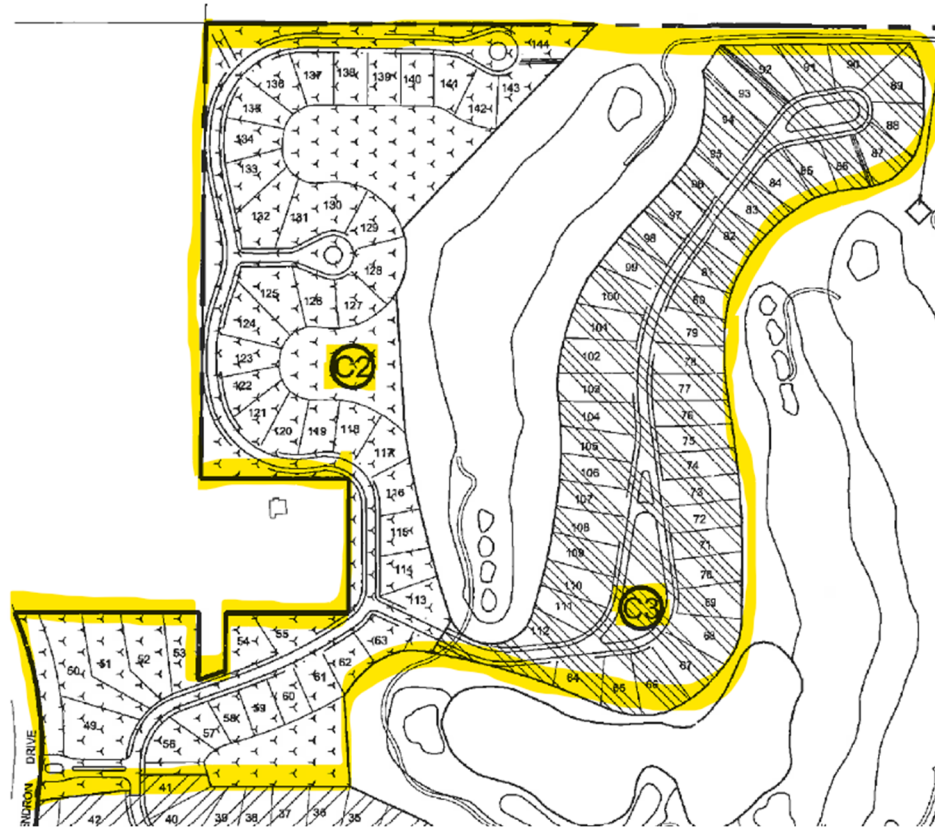
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<sup>7</sup> Attachment: RESOLUTION PC 07 21 MOD 01

<sup>8</sup> Attachment: RESOLUTION PC 08 19 MOD 06

<sup>9</sup> Attachment: RESOLUTION PC 16 21 PUD 01

<sup>10</sup> Attachment: RESOLUTION PC 17 26 PUD 01 (01) AND RESOLUTION PC 17 26 PUD 01 (02)



Map 1 – Original Sandpines Master Plan Submittal (Planned Unit Development) November 2003<sup>11</sup>

4. Applicant has worked with city staff to improve street safety and emergency access within the site by designing a looped access street system that provides enhanced traffic flow, provides two access points into the subdivision, eliminates cul-de-sacs, and accommodates many city requirements.

Applicant holds homeowner safety in high regard, plans to work with the Planning Commission, and remains open to alternate conditions of approval that enhance public safety. However, constructing a second access road on the north end of the development, as proposed in the comments above, is simply not possible.

### 3. Comments from Mike Miller, Public Works Director, City of Florence (December 2022) Stormwater Issues:

***For Fairway Estates, Phase II the applicant is proposing deferment of stormwater treatment for individual homesites until time of home construction. This area is known for high ground water levels. The stormwater system will need to consider mitigation/management of the groundwater as well as the stormwater runoff from impervious areas of the home sites, which***

<sup>11</sup> Attachment: Sandpines Master Plan

***includes the roofs. Additionally, the consultant for the developer utilized hydrologic soil group D in their analysis for pre-developed flows. The soils in the area are A/D and have a high permeability under normal conditions but low permeability when saturated or when groundwater is high. IN discussions with our engineers, the developer used a high curve number for post development, therefore their analysis is valid.***

***Items (1-7 below<sup>12</sup>) that are missing and are needed prior to approval of the stormwater management plan are:***

***1. Information is needed regarding how time of concentration was calculated.***

Response: Please see revised stormwater report, page 1 of Appendix B – Sizing Spreadsheets and Calculations.<sup>13</sup>

***2. Additional freeboard is needed for the roadside swales. The overflow elevation appears to be the same as the adjacent ribbon curb elevation.***

Response: Please see revised stormwater report (referenced below), page 3, Appendix A – Figures, Drainage Map, bottom right-hand corner of figure. 2-inch freeboard added between the 18-inch-thick topsoil layer and the top of the concrete ribbon.

***3. Our Stormwater Manual specifies 18-inches of topsoil. The developer is proposing 2-inches of soil which is not sufficient for sustaining plants or providing treatment.***

Response: Please see revised stormwater report (referenced below), page 3, Appendix A – Figures, Drainage Map, bottom right-hand corner of figure. Plans have been revised to meet 18-inch-thick topsoil layer specification.

***4. Developer's engineer needs to provide a table of pre versus post runoff values for each drainage basin.***

Response: Please see revised stormwater report, Appendix C – Pre-Developed Versus Post-Developed Runoff, referenced below.

***5. Developer's engineer needs to provide Operations and Maintenance forms and information per the City Stormwater Design Manual.***

Response: Please see revised stormwater report, Appendix D – Florence Stormwater Design Manual Excerpted Operation and Maintenance Plan, referenced below.

***6. Provide a landscape plan per the Stormwater Design Manual.***

Response: Please see vegetation detail added to the utility plan<sup>14</sup> and open space plan<sup>15</sup> and stormwater management plan, Appendix D – Florence Stormwater Design Manual Excerpted Operation and Maintenance Plan, referenced below.

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<sup>12</sup> Attachment: Public Works (PW) Director Email, December 21, 2023

<sup>13</sup> Attachment: Revised Stormwater Management Report

<sup>14</sup> Attachment: Revised Utility Plan

<sup>15</sup> Attachment: Revised Parklands & Open Space Plan



- 7. Additional information regarding pipe type, size and invert elevations will be needed. Structures will be required at all stormwater main connections.**

Response: Detailed pipe properties such as type, size, invert elevation, etc. will be provided with capital improvement plans once subdivision is approved.

#### **4. Comments from Matt Hughart, Principal Planner, Kittelson & Associates, Inc. Transportation Issues:** <sup>16</sup>

***Sandow Engineering performed a traffic impact analysis for a proposed 42-lot expansion of the existing Fairway Estates subdivision to be located west of Rhododendron Drive in Florence, OR.***

***Our review of the TIA found that the analysis was prepared according to industry practice/standards and is consistent with the Traffic Impact Study requirements in Florence Code FCC 10-1-1-4-E(2)(c) and 10-35-2-5A. All applicable in-process developments were accurately accounted for, the subsequent technical analyses were performed accurately, and the analysis supports the study's intersection operations findings. However, given the increased demand at the Rhododendron Drive/35th Street intersection and to be consistent with previous direction provided by the City of Florence Planning Commission on other recent traffic impact studies in the site vicinity, we would recommend Sandow Engineering perform a southbound left-turn lane assessment at the Rhododendron Drive/35th Street intersection under the 2024 and 2029 analysis scenarios.***

Response: Please see Memorandum from Sandow Engineering assessing the southbound left-turn lane at the Rhododendron Drive/35th Street intersection under the 2022, 2024 and 2029 analysis scenarios.<sup>17</sup>

#### **5. Comments from Matt Hughart, Principal Planner, Kittelson & Associates, Inc. Transportation Issues:**<sup>18</sup>

***Here are some responses to Mr. Faber's comments/questions:***

- 1. ODOT collects all "reported" crash data on roadways and intersections throughout the state. The ODOT supplied crash data summary sheets are included in Appendix A and they do confirm there have been no reported crashes at the 35th/Rhododendron intersection in the most recent 5-year reporting window.***

Response: Supportive comment no action needed.

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<sup>16</sup> Attachment: Transportation Engineering Email, January 3, 2023

<sup>17</sup> Attachment: Sandow Response Memo, February 3, 2023

<sup>18</sup> Attachment: Transportation Engineering Email, January 9, 2023

- 2. Given that the study is accounting for all traffic growth from planned/approved development projects in the area and applying an additional 1% growth rate to these adjusted volumes, this represents a reasonably conservative approach and one that is consistent with past traffic impact studies in the area.***

Response: Supportive comment no action needed.

- 3. The TIA as written focuses primarily on the vehicular-based impacts of the proposed development and is consistent with the Traffic Impact Study requirements in Florence Code FCC 10-1-1-4-E(2)(c) and 10-35-2-5A.***

Response: Supportive comment no action needed.

- 4. The Veneta references on pages 31 and 35 are likely a labeling error/mistake.***

Response: Supportive comment no action needed.

- 5. Despite the previously noted Veneta reference, all traffic volume summary sheets included in the Appendix C have been appropriately referenced in the body of the TIA.***

Response: Supportive comment no action needed.

- 6. Per guidance from ODOT, this TIA correctly avoids the use of 2020 count data when developing a seasonal adjustment factor. While the TIA did rely on a 2020 35th/Rhododendron intersection count, it only did so after factoring the count based on updated counts and other regional volume data. The factor was found to be reasonable.***

Response: Supportive comment no action needed.

- 7. The trip distribution estimates shown on pages 54-57 were developed for a separate project by another consulting firm. The summary sheets were included in the appendix to simply document the in-process volumes used in the TIA.***

Response: Supportive comment no action needed.

- 8. The 1/5/22 and 1/6/22 dates listed on pages 59-109 are simply the dates in which that analysis was performed in the Synchro software program.***

Response: Supportive comment no action needed.

**Attachment Cross Reference Table:**

This table cross references attachment names found in page footers to files names found in the electronic submittal package.

Attachment	File Name (*.PDF)
Fairway Estates Submittal Memo	21-051_FairwayEstates_Memo_20230206
RESOLUTION 03-12-30-41	21-051_FairwayEstates_APRV_20040113_Res_03-12-30-41
RESOLUTION PUD 05 03	21-051_FairwayEstates_ApRV_20050927_Res_PUD-05-03
RESOLUTION PC 07 21 MOD 01	21-051_FairwayEstates_APRV_20070807_Res_PC-07-21-MOD-01
RESOLUTION PC 08 19 MOD 06	21-051_FairwayEstates_APRV_20080926_Res_PC-08-19-MOD-06
RESOLUTION PC 16 21 PUD 01	21-051_FairwayEstates_APRV_20161108_Res_PC-16-21-PUD-01
RESOLUTION PC 17 26 PUD 01 (01)	21-051_FairwayEstates_APRV_20180522_Res_PC-17-26-PUD-01_00
RESOLUTION PC 17 26 PUD 01 (02)	21-051_FairwayEstates_APRV_20180522_Res-PC-17-26-PUD-01_01
RESOLUTION PC 18 49 SUB 03	21-051_FairwayEstates_APRV_20190528_Res_PC-18-49-SUB-03
PW Director Email, December 21, 2023	21-051_FairwayEstates_P1_Stormwater-Referral
Transportation Engineering Email, Jan 9, 2023	21-051_FairwayEstates_P2a_TIA-Review
Transportation Engineering Memo, Jan 3, 2023	21-051_FairwayEstates_P2-TIA-Review
Fire Chief Email, October 4, 2023	21-051_FairwayEstates_P3_FireChief-Referral-SVFR_20221004
Fire Chief Email, Jan 12, 2023	21-051_FairwayEstates_P3a_FireChief-Referral-SVFR_20220112
Sandow Response Memo, February 3, 2023	21-051_FairwayEstates_Response_TIA_Reveiw_2.3.23_sgn
Revised Parklands& Open Space Plan	21-051_FairwayEstates_Site_PrkLnd-Path-OS_013123
Sandpines Master Plan	21-051_FairwayEstates_Site_Snadpines_Master_Plan
Revised Utility Plan	21-051_FairwayEstates_Site_Utility_Plan_013123
Revised Strom Water Management Report	21-051_FairwayEstates_STM_MNGMT_Report_Revised_01302023