

Date:	April 9, 2025
To:	Brent Bybee, AICP & Geoff Wullschlager
From:	Joe Bessman, PE
Project Reference No.:	1856
Project Name:	RV Park Text Amendment



The purpose of this memorandum is to support the proposed text amendment to allow RV parks with access onto a locally classified road. Per La Pine Development Code, to cite an RV park a site must include direct access to a *Collector* or *Arterial* street. This language limits the access to the Rosland Road site, as Rosland Road is a designated Collector east of US 97 to Drafter Road, then transitions into a *Local Street* despite no change in its configuration or design.

Accordingly, to support the Rosland Road RV Park, a text amendment has been proposed that would modify Article 6 – Special Use Standards, Chapter 15.108 – Special Use Standards – Non-Residential Uses, Section 15.108.020- Campgrounds and recreational vehicle parks, Subsection B.2, as follows (underline signifies new language):

Access to the site shall be from an arterial or collector street, except that access to the site may be taken from a local street, when:

- *The local street connects to an arterial or collector street, within 200 feet of the primary access point;*
- *The local street connection to the arterial or collector street does not pass through any residential zone; and*
- *The local street connection to the arterial or collector street is constructed to City Standards.*

These conditions ensure that access to an RV park does not impact residential neighborhoods or provide an extended connection using a local street, or use of a local street that has not been constructed to City (or County) standards. These conditions ensure the same compatibility and suitability for RV park access as was intended with the current text.

TRANSPORTATION PLANNING RULE COMPLIANCE

The proposed text amendment has limited impact on the City's transportation system, addressing the potential point of access for a specific land use while maintaining the original intent of the provision. As identified within a prior rezone application submitted by the applicant, an RV park is a fairly low-intensity use within the Commercial Mixed-Use zone, and in fact is much less intense than other uses that would be allowed outright and permitted to directly access Rosland Road.

It is the project team's understanding that the purpose of not allowing access to an RV park from a local street is primarily related to compatibility, as RV parks are a low-intensity commercial use and a local street would provide ample carrying capacity to support this type of use. In fact, the trip rates on a per-

site basis for an RV park is lower than those of a hotel room or any type of residence (all of which would be allowed outright within the Commercial and/or Mixed-Use Zones).

The Transportation Planning Rule does not address compatibility; its emphasis is on safety, capacity, and ensuring coordination between agency plans and funding sources. As described below, the Transportation Planning Rule does not apply to the specific access location for an otherwise permitted use. Text from the Transportation Planning Rule section on Plan and Land Use Regulation Amendments (OAR 660-012-0060, shown in *italics*) and our response is provided below.

(1) If an amendment to a functional plan, an acknowledged comprehensive plan, or a land use regulation (including a zoning map) would significantly affect an existing or planned transportation facility, then the local government must put in place measures as provided in section (2) of this rule, unless the amendment is allowed under section (3), (9) or (10) of this rule. A plan or land use regulation amendment significantly affects a transportation facility if it would:

(a) Change the functional classification of an existing or planned transportation facility (exclusive of correction of map errors in an adopted plan);

Response: Access to an RV park from a local street would not change the functional designation of a road. As previously documented with the Zone Change on Roseland Road, an RV park is a less intense use than most other outright allowable uses within the CMX zoning. Therefore, the allowance of access onto a local street would not permit a higher trip generation rate than would otherwise be supported within Commercial and/or Mixed-use zoning. The City of La Pine (and Deschutes County) functional classification system is primarily based on connectivity and Average Daily Trips (ADT); the specific location of an access to a road does not change its functional classification. This is particularly the case at Rosland Road when the locally-classified portion of the road contains the same physical cross-section as the adjacent Collector-classified portion.

(b) Change standards implementing a functional classification system; or

Response: The proposed text amendment does not change any of the standards applied by La Pine (or Deschutes County); this criterion does not apply.

(c) Result in any of the effects listed in paragraphs (A) through (C) of this subsection. If a local government is evaluating a performance standard based on projected levels of motor vehicle traffic, then the results must be based on projected conditions measured at the end of the planning period identified in the adopted TSP. As part of evaluating projected conditions, the amount of traffic projected to be generated within the area of the amendment may be reduced if the amendment includes an enforceable, ongoing requirement that would demonstrably limit traffic generation, including, but not limited to, transportation demand management. This reduction may diminish or completely eliminate the significant effect of the amendment.

(A) Types or levels of travel or access that are inconsistent with the functional classification of an existing or planned transportation facility;

Response: The access onto Rosland Road and other local roads from Commercial and/or Mixed-use zones are permitted to support a range of uses that include higher-intensity uses than an RV Park, such as eating and drinking establishments, as well as uses that involve similar (large) truck trips, such as a self-storage facility. Accordingly, the text amendment does not change the levels of travel or even the types of travel that might occur on local streets.

While the proposed text amendment is not specific to Rosland Road, the proposed allowance of the RV park does not change the types of travel, it does not change the access policies related to Rosland Road (or other local roads), and the use of Rosland Road (and other local roads) and intensity of trips would remain consistent with the functional classification and the physical design of the streets (regarding Rosland, it is the same both east and west of Drafter Road despite the change in functional classification).

*(B) Degrade the performance of an existing or planned transportation facility such that it would not meet the performance standards identified in the TSP or comprehensive plan;
or*

Response: As previously noted, there are more intense uses permitted outright within the Commercial and/or Mixed-Use zoning district that would generate more trips than an RV park. Allowing the RV park access onto local roads, such as Rosland Road does not result in any system degradation.

(C) Degrade the performance of an existing or planned transportation facility that is otherwise projected to not meet the performance standards identified in the TSP or comprehensive plan.

Response: Similarly, as the RV Park is a less intense use than other outright permitted uses within the Commercial and/or Mixed-Use zoning districts there is no degradation in the performance of existing or planned facilities that are forecast to operate acceptably or unacceptably in the horizon year of the TSP.

Specific to the planned RV park and Rosland Road, our team is aware of the concerns related to US 97 access. Other transportation mitigation measures have been proposed to help address operations at the US 97/Rosland Road intersection, though as a less intense use, within the comparative assessment for the TPR, these are not applicable to the proposed text amendment.

As none of the criteria within OAR 660-012-0060(1) are met, a significant impact does not occur with the proposed text amendment.

Please let me know if you have any questions on this memorandum at (503) 997-4473 or via email at joe@transightconsulting.com.