
The comments of this pre-app are preliminary in nature and subject to change based upon the submittal of additional or different information. The Planning Commission or City Council are the final decision-making authority of the City and are not bound by the comments made by the Staff as part of this pre-application.

**ASHLAND PLANNING DEPARTMENT
PRE-APPLICATION CONFERENCE
COMMENT SHEET**
October 22, 2025

SITE: Iowa Street Tax Lot 500
APPLICANT: Mark Knox-Spartan Properties LLC.
REQUEST: 5-lot PSO Subdivision with seven Units

Planning Division Comments

This pre-application conference is intended to highlight significant issues of concern to staff and bring them to the applicant's attention prior to their preparing a formal application submittal.

Summary and Proposal: The proposal is located on a vacant, flag lot near Iowa Street and Wightman Street. The lot was created through a 1989 land partition as shown on Jackson County Survey 11530. The property is zoned R-3 high density multifamily residential and is 0.37 acres. The base density for R-3 zoned properties is 20 dwelling units per acre. The base density for the subject property is 7.4 dwelling units per acre, and excluding the flagpole from the base density calculation the base density is 6.38 units. The flagpole is excluded from the lot area for development purposes; and as proposed the density equates to 6.5 units.

Proposed site improvements include: five lots with a total of seven dwelling units and a single common area for open space, parking and the flag drive. Lots 1 and 2 propose two story units, with the second floor being accessory apartments at the south end of the site for solar compliance. Lots 3,4 & 5 are one story cottages. Six parking spaces are proposed to be voluntarily provided, including one ADA space.

AMC 18.5.3.060.E provides that no more than two flag lots may be served by a flag drive; AMC 18.2.4.010 provides that, “Each lot shall abut a public street other than an alley for a width of not less than 40 feet; except, where a lot is part of an approved flag partition or abuts a cul-de-sac vehicle turn-around area, the minimum width is 25 feet.” While staff are open to further discussion, creation of five new lots off of a flag drive seems problematic in light of these two provisions, and staff would advise the applicants to strongly consider the creation of rental units on the existing lot or splitting the lot in two for the development. Either of these options could be processed administratively (Site Design Review and/or Partition).

PERFORMANCE STANDARDS OPTIONS (PSO) SUBDIVISION (FINAL PLAN WITH OUTLINE PLAN)

The approval criteria for Outline Plan subdivision approval under the Performance Standards Options chapter (AMC 18.3.9) are detailed below:

- a. *The development meets all applicable ordinance requirements of the City.***

Solar Access: Newly created lots must comply with the Solar Access Performance Standard in [AMC 18.4.8.040](#).

Voluntarily Provided Parking: No off-street parking is required, however any voluntarily provided parking must meet the dimensional, circulation and vehicle area design standards in AMC 18.4.3 and provide at least 30 percent tree canopy coverage over the parking area, and the Parking Lot Landscaping and Screening Standards in AMC 18.4.4. At least one ADA space must be provided, and the parking area would need to meet any applicable building codes requirements for electric vehicle charging infrastructure.

Lot 5 & Driveway Configuration: For staff, the driveway configuration and it's relationship to Lot 5 have potential issues. It's unclear whether a vehicle parked in the ADA space has room to turn and exit to the street in a forward manner, which is a requirement for flag drives. The application will need to demonstrate that a functional turning movement is possible to meet this standard. In addition, the driveway directs headlights and vehicle flow directed directly at the unit without the requisite eight-foot landscaped buffer. A buffer will need to be provided or an exception to this standard requested.

Setbacks/Yard Requirements: While standard setbacks do not apply within PSO subdivisions, the underlying setbacks of the parent parcel must be preserved, each lot must provide a front yard consistent with the underlying zoning and building separation must be addressed.

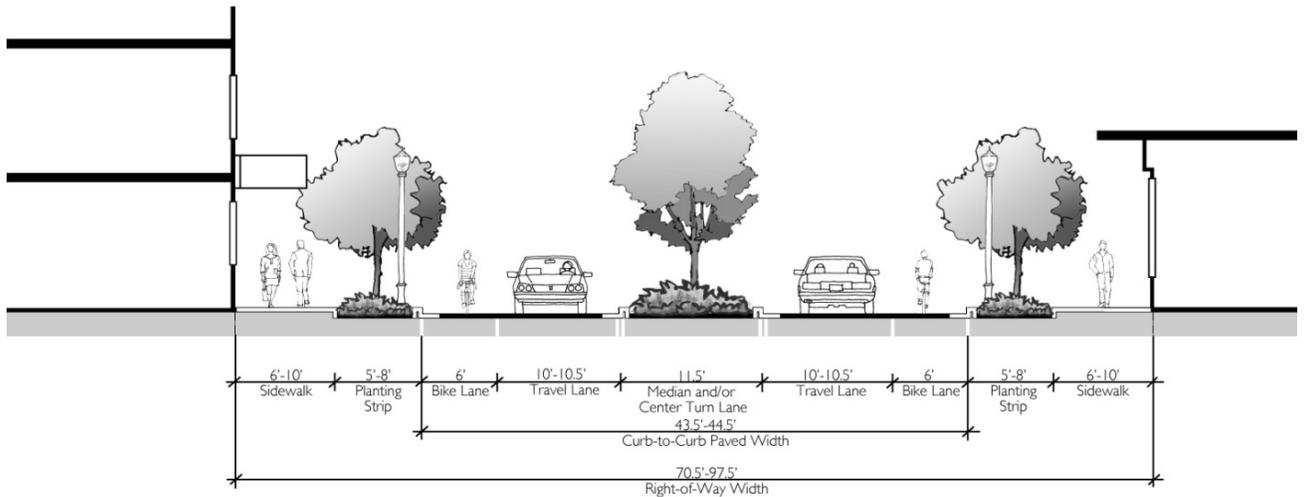
Access & Minimum Street Frontage (AMC 18.2.4.010): Each lot shall abut a public street other than an alley for a width of not less than 40 feet; except, where a lot is part of an approved flag partition or abuts a cul-de-sac vehicle turn-around area, where the minimum width is 25 feet.

- b. Adequate City facilities can be provided including water, sewer, paved access to and through the development, electricity, urban storm drainage, police and fire protection, and adequate transportation; and that the development will not cause a City facility to operate beyond capacity.**

Adequate Capacity of Public Utilities: The applicants will need to demonstrate that adequate water, sanitary sewer, storm sewer, and electricity services, and paved access/adequate transportation are available or can be extended to serve the proposed development. The Site Plan must show the location and size of the public utility lines that will serve the proposed parcels and detail service locations for each proposed lot, and plans will not be deemed complete without a utility plan which includes an Electric Department-approved electric service plan. *(See specific utility notes in Public Works comments at the end of this document.)*

Frontage Improvements/Street Standards: Iowa Street is classified as an Avenue in Ashland's Transportation System Plan (TSP) and city standards envision its ultimate development as illustrated below.

Prototypical Section: 3-Lane Avenue



Frontage improvements would typically need to be installed to city standards with development, or an Exception to the Street Standards requested. However, given that the frontage here is limited to a 20-foot flag drive, staff believe the most appropriate approach would be to dedicate any additional right-of-way needed for city standard frontage improvements on the corridor and to sign in favor of a future Local Improvement District (LID) so that Iowa Street can be improved through a coordinated plan.

Curb Cuts: Curb cuts should generally comply with controlled access standards which require a 75-foot separation between driveways and a 50-foot distance from intersections, however if the existing curb cut is non-conforming, and there is no option to correct the non-conformity and it isn't being modified there should not be an issue.

Fire Turn-Around: It would be advisable to contact Fire Marshal Mark Shay to verify specific fire apparatus access and turn-around requirements.

- c. *The existing and natural features of the land; such as wetlands, floodplain corridors, ponds, large trees, rock outcroppings, etc., have been identified in the plan of the development and significant features have been included in the common open space, common areas, and unbuildable areas.*
- d. *The development of the land will not prevent adjacent land from being developed for the uses shown in the Comprehensive Plan.*
- e. *There are adequate provisions for the maintenance of common open space and common areas, if required or provided, and that if developments are done in phases that the early phases have the same or higher ratio of amenities as proposed in the entire project.*

CC&R's & Phasing: The final application materials should include draft CC&R's addressing the common area maintenance, as well as details of any proposed project phasing.

- f. *The proposed density meets the base and bonus density standards established under this chapter.*

The property is zoned R-3 high density multifamily residential and is 0.37 acres. The base density for R-3 zoned properties is 20 dwelling units per acre. The base density for the subject property would be 7.4 dwelling units per acre, but excluding the flagpole from the base density calculation the base density is 6.38 units. Flagpoles are excluded from the lot area for development purposes. As proposed the density equates to 6.5 units which would need to be addressed in the final application.

- g. *The development complies with the street standards.*

See items under adequate city facilities in “b” above.

- h. *The proposed development meets the common open space standards established under section [18.4.4.070](#). Common open space requirements may be satisfied by public open space in accordance with section [18.4.4.070](#) if approved by the City of Ashland.*

Cottage Housing Ordinance: AMC 18.2.3.090 provides specific regulations for Cottage Housing developments where allowed. While this chapter is unavailable for use in the R-3 (High Density Multi-Family Residential) zoning district, the cottage housing development standards in AMC 18.2.3.090.C may provide worthwhile guidance in addressing issues such as open space in a way that fosters livability.

Site Design Review: For residential projects, those involving three or more units per lot are subject to Site Design Review as are projects involving “*off-street parking or landscaping in a residential development where such parking or landscaping is provided in common area (e.g., shared parking) and is approved pursuant to chapter [18.3.9](#), Performance Standards Option and PSO Overlay.*” Here, the parking provided on a common area would need to be considered through Site Design Review under the criteria in [AMC 18.5.2.050](#), as well as the applicable development and design standards for parking lots in AMC 18.4. In staff’s review, it appears that a five-foot landscape buffer at the property line would be required or an Exception would need to be requested.

Details: The final application materials will need to make clear the proposed lot configuration, that lot coverage is addressed, how the perimeter setback and front yard setbacks in the PSO subdivision are to be addressed and provide scalable site plans and elevation drawings.

Tree Preservation, Protection and Removal: An inventory of all trees six-inches in diameter at breast height and greater on the property and within 15 feet of the property boundaries is required with the application as required in AMC 18.4.5. The inventory must include detailed information including but not limited to species, diameter at breast height, condition, and drip line/protection area of each tree. The plan must clearly identify trees to be preserved and how they will be protected and show those trees to be removed, and address the tree removal permit requirements in AMC 18.5.7 for significant trees to be removed. Tree removal permit requests would be considered in light of the Performance Standards focus on preserving natural features as well as the Tree Removal Permit criteria.

Site Visit: Prior to a hearing, staff would recommend that a Site Visit be arranged with the Planning Commission to give them an idea of the specifics of the site (*i.e. relationship to adjacent properties, existing frontage improvements, driveway locations, stature and condition of existing trees, etc.*). Planning Commission site visits are typically held the Monday afternoon prior to the Tuesday Planning Commission hearing.

Neighborhood Outreach: Projects involving changes to established neighborhood patterns can be a concern for neighbors; staff always recommend that applicants approach the affected neighbors, make them aware of the proposal, and try to address any concerns as early in the process as possible. Notices are typically sent to neighbors within a 200-foot radius of the property. In many cases, an application is better received if neighbors first hear of the proposal from the applicant rather than through a formal notice from the city. (*Neighbors have already contacted staff to question the number of units proposed and parking to be provided.*)

Written Findings/Burden of Proof: This pre-application conference is intended to highlight significant issues of concern to staff and bring them to the applicant's attention prior to their preparing a formal application submittal. Applicants should be aware that written findings addressing the ordinance and applicable criteria are required, and are heavily depended on when granting approval for a planning action. In addition, the required plans are explained in writing below. The burden of proof is on the applicant(s) to ensure that all applicable criteria are addressed in writing and that all required plans, written findings, and other materials are submitted even if those items were not discussed in specific, itemized detail during this initial pre-application conference.

OTHER DEPARTMENTS COMMENTS

BUILDING DEPARTMENT: No comments at this time. Please contact the Building Division for any building code related questions at [541-488-5305](tel:541-488-5305) or via email to building@ashlandoregon.gov.

CONSERVATION: No comments at this time. For information on available conservation programs, including any available appliance rebates or financial or technical assistance for energy efficient construction, please contact Conservation at [541-488-5305](tel:541-488-5305) or via email to dan.cunningham@ashlandoregon.gov.

PUBLIC WORKS/ENGINEERING: **See attached comments.** Please contact Karl Johnson of the Engineering Division for any Public Works/Engineering information at 541-552-2415 or via email to karl.johnson@ashlandoregon.gov.

FIRE DEPARTMENT: No comments at this time. Please contact Mark Shay from the Fire Department for any Fire Department related information at [541-552-2217](tel:541-552-2217) or via email to mark.shay@ashlandoregon.gov.

ELECTRIC DEPARTMENT: Please contact Rick Barton in the Electric Department for service requirements, electric layout and connection fee information at [541-552-2082](tel:541-552-2082) or via email to rick.barton@ashlandoregon.gov.

WATER AND SEWER SERVICE: No comments provided. For any questions regarding water and/or sewer utilities, please contact Dean LeBret at [541-552-2326](tel:541-552-2326) or email dean.lebret@ashlandoregon.gov.

Application Requirements

Applications for Outline Plan subdivision approval are processed as a “Type II” procedure which requires a decision through a quasi-judicial hearing at the Planning Commission. The Planning Commission’s decision may be appealed, in which case it is subject to an “*on-the-record appeal*” before the City Council. (For further procedural detail, see:

https://ashlandoregon.gov/DocumentCenter/View/203/Process-Flowchart---Type-II-Planning-Action_FY25-26-PDF?bidId=)

The application is required to include clear, legible, scalable drawings illustrating the proposal formatted to print to scale on paper no larger than 11-inches x 17-inches, along with written explanations of how the proposal satisfies the applicable criteria from the Ashland Land Use Ordinance (Chapter 18 of the Ashland Municipal Code), which are detailed below. The following sections include the requirements for plans and approval criteria which are applicable to the proposal as described in the pre-application submittals. When more than one planning approval is required for the proposal, multiple sections of the ALUO may apply. The burden of proof is on the applicant(s) to ensure that all applicable criteria are addressed in writing and that all required plans, written findings, and other materials are submitted even if those items were not discussed in specific, itemized detail during this initial pre-application conference. All submittals must also include:

Submittal Information

The application is required to include all of the following information.

- a. The information requested on the application form at <https://ashlandoregon.gov/DocumentCenter/View/262/Zoning-Permit-Application-PDF>.
- b. Plans and exhibits required for the specific approvals sought (see below).
- c. A written statement or letter explaining how the application satisfies each and all of the relevant criteria and standards in sufficient detail (see below).
- d. Information demonstrating compliance with all prior decision(s) and conditions of approval for the subject site, *as applicable*.
- e. The required fee (see below).

The Ashland Land Use Ordinance, which is Chapter 18 of the Municipal Code, is available online in its entirety at: <https://ashland.municipal.codes/LandUse>

Written Statements

Please provide written statements explaining how the application meets the approval criteria from the sections of the Ashland Municipal Code listed below. These written statements provide the Staff Advisor or Planning Commission with the basis for approval of the application:

- **Outline Plan:** <https://ashland.municipal.codes/LandUse/18.3.9.040.A.3>

- **Final Plan:** <https://ashland.municipal.codes/LandUse/18.3.9.040.B.5>
- **Site Design Review** (if applicable): <https://ashland.municipal.codes/LandUse/18.5.2.050>
- **Variance** (if applicable): <https://ashland.municipal.codes/LandUse/18.5.5.050>
- **Exception to Street Standards** (if applicable): <https://ashland.municipal.codes/LandUse/18.4.6.020.B>
- **Tree Removal Permit** (if applicable): <https://ashland.municipal.codes/LandUse/18.5.7.040>

Plans & Exhibits Required

Please provide legible electronic exhibits (plans or drawings) addressing the submittal requirements from the sections of the Ashland Municipal Code listed below. These exhibits are used to copy the Planning Commission packets and for notices that are mailed to neighbors. Provide electronic plan sets that can be printed to 11 inches by 17 inches are reproducible and drawn to a standard architect’s or engineer’s scale.

- **Outline Plan:** <https://ashland.municipal.codes/LandUse/18.3.9.040.A.2>
- **Final Outline Plan:** <https://ashland.municipal.codes/LandUse/18.3.9.040.B.4>
- **Site Design Review** (if applicable): <https://ashland.municipal.codes/LandUse/18.5.2.040>
- **Variance** (if applicable): <https://ashland.municipal.codes/LandUse/18.5.5.040>
- **Tree Inventory/Protection Plan:** <https://ashland.municipal.codes/LandUse/18.4.5.030.B>
- **Tree Removal Permit Plan:** <https://ashland.municipal.codes/LandUse/18.5.7.030>

UPCOMING APPLICATION DEADLINES: First Friday of each month
UPCOMING PC MEETINGS: Second Tuesday of each month

FEES:

Final Plan w/Outline Plan	\$3,607.10 + \$180.60 per lot
Site Design Review:	\$1,349.60 + \$89.55 per unit
Exceptions (if applicable)	\$ 0
Tree Removal Permits (if applicable)	\$ 0

***NOTE:** Applications are accepted on a first-come-first served basis. All applications received are reviewed and must be found to be complete before being processed or scheduled at a Planning Commission meeting. Applications will not be accepted without a complete application form signed by the applicant(s) and property owner(s), all required materials and full payment. Applications are reviewed for completeness in accordance with ORS 227.178.

For further information, please contact:

Nick Schubert, Associate Planner
 City of Ashland, Department of Community Development
 Phone: 541-552-2045 or email: nick.schubert@ashlandoregon.gov

October 22, 2025
 Date

Public Works Comments

- 1. Engineered Plans** - Where public improvements are required or proposed, the applicant's engineer shall submit design plans for approval of all public improvements identified on the approved plan or as specified in the conditions of approval. One set of these civil plans **MUST BE SUBMITTED DIRECTLY TO THE PUBLIC WORKS/ENGINEERING DEPARTMENT.**

All design plans must meet the current City of Ashland Public Works Standards. Engineered construction plans and specifications shall be reviewed and signed by the Public Works Director, prior to construction. All public facilities within the development will be designed to the City of Ashland Engineering Design Standards for Public Improvements.

Where public improvements are required or completed, the developer shall submit as-built drawings of all public improvements constructed during and in conjunction with this project. Field changes made during construction shall be drafted to the drawings in the same manner as the original plans with clear indication of all modifications (strike out old with new added beside).

The engineered plans MUST CONFORM TO THE FOLLOWING:

- Drawings must be submitted digitally and **MUST** be true scale PDF drawings
- Drawings sizes shall comply with ANSI-defined standards for page width and height.
- Review and construction drawings **MUST** be submitted in B size (11x17).
- All final, as-constructed drawings, **MUST** be submitted digitally as true scale PDF drawings and on Mylar if requested. Final drawings shall be B size (11x17) or D size (22x34). If D size drawings are produced, both B size and D size **MUST** be submitted.

2. Permits – Any construction or closure within the public right of way or public utility easement will require a Public Works permit and before any work in the right of way or public utility easement commences, all necessary permits **MUST** be obtained.

3. Right-of-Way – No additional right-of-way dedication, beyond that necessary to comply with City Street Standards, will be required at this time.

4. Street Improvement – No additional street improvements, beyond those necessary to comply with City Street Standards, will be required at this time.

5. Driveway Access – No additional improvements/requirements will be requested at this time, but the applicant proposed improvements must be reviewed and permitted by the City of Ashland Engineering Department.

6. Sanitary Sewer - The property is currently served by a 6-in sanitary sewer main in Iowa Street. The applicant proposed improvements must be reviewed, approved and permitted by the City of Ashland Engineering Department.

7. Water - The property is currently served by a 6-in water main in Iowa Street. City of Ashland Water Department shall tap existing water main and install any new water services

and water meter boxes that are proposed by development. City of Ashland Water Department must be contacted for availability, placement and costs associated with the installation of the new water service. Service & Connection Fees will also be required for any new water services installed as part of this project.

8. Storm Drainage - The property is currently served by a 10-in storm sewer main in Iowa Street. City of Ashland Engineering Department must review an engineered storm drainage plan.

Storm Water Facility Design Requirements

Applicant MUST follow the guidance and requirements set forth in the current Rogue Valley Stormwater Quality Design Manual which can be found at the following website:

<https://www.rvss-or.gov/stormwater-management-and-erosion-control/rogue-valley-stormwater-quality-design-manual>

All stormwater calculations, reports, drawings, etc. shall be submitted to the City of Ashland Engineering Department for review.

9. Erosion & Sediment Control - The following requirements shall be met:

- All ground disturbances exceeding 2,500 square feet shall implement an Erosion and Sediment Control Plan (ESCP).
- A 1200-C permit will be secured by the developer where required under the rules of the Oregon State DEQ. City of Ashland Engineering Department must receive a copy of this permit before any construction shall begin.
- Erosion Prevention and Sediment control measures that meet the minimum standards set forth by the City of Ashland Public Works/Engineering Standard Drawing CD282 must be in place before any construction related to the project begins.
- Pollution, track out, and sediment dumping into storm water are strictly prohibited per AMC 9.08.060.
- Drainage from automotive use areas shall be limited to oil concentrations of 10 mg/l by a pre-approved means.
- Trash storage areas shall be covered or provide additional storm water treatment by an approved means.
- Off street parking areas shall conform to Ashland Municipal Code 18.4.3.080.B.5, including provisions to minimize adverse environmental and microclimatic impacts.