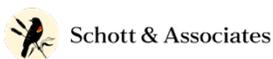




# Ashland Mill Master Plan Application

Master Plan, Regulating Plan, Narrative, Draft Findings,  
Preliminary Plat, and Technical Reports

Submitted to the City of Ashland, Oregon, November 17, 2025





# Ashland Mill Master Plan

## TABLE OF CONTENTS

1. Project Description and Request .....	5
2. Project Location and Existing Conditions .....	7
2.1. Project Location .....	7
2.2. Comprehensive Plan Designation.....	9
2.3. Existing Zoning .....	10
2.4. Existing Land Use.....	11
2.5. Past Uses and Historic Resources.....	11
2.6. Critical Areas.....	14
2.7. Existing Grading, Utilities, Trees.....	16
2.8. Existing Transportation Infrastructure.....	19
3. Master Plan Elements.....	21
3.1. Land Use .....	21
3.2. Employment Land and Residential Uses .....	23
3.3. Phasing of Employment Land .....	27
3.4. Affordable Housing: Baseline and Target .....	28
3.5. Illustrative Master Plan .....	33
3.6. Regulating Plan .....	35
3.7. Proposed Zoning Map .....	37
3.8. Phasing Plan .....	39
3.9. Preliminary Utility and Mass Grading Plans .....	42
3.10. Prototypical Elevations and Building Volumes .....	45
4. Proposed Alternative Standards .....	47
4.1. Summary .....	47
4.2. Street Medians in Private Ownership .....	47
4.3. Laneway-Greenway Configuration .....	48
4.4. Pervious Parking Areas .....	48
4.5. Other Alternate Standards .....	48
5. Draft Findings of Fact .....	49
5.1. Type III Legislative Application .....	49
5.2. Type II Planning Action .....	60
5.3. Conclusion .....	71

APPENDICES (Under Separate Cover):

- 1 Application
- 2 (File location of this document)
- 3 Draft Revisions to Croman Mill District Ordinance (Markup)
- 4 Draft Revisions to Croman Mill District Ordinance (Clean)
- 5 Preliminary Plat – Phase One
- 6 Preliminary Grading and Utilities Plans
- 7 Utility Feasibility Technical Memo
- 8 Economic Opportunities Analysis Update and Memos
- 9 Critical Areas and Wetland Delineation
- 10 Department of State Lands Approval Letter
- 11 Traffic Impact Analysis
- 12 Draft Development Agreement

# 1. Project Description and Request

---

Townmakers LLC (the Applicant) proposes a new master planned development in the City of Ashland, Oregon (the City), to be called Ashland Mill (the Project). This new development will comprise the core of the previously established Croman Mill District within the City of Ashland, occupying the site of the former Croman timber mill. The name “Ashland Mill” commemorates the city’s history (and original name) as well as the history of mills in Ashland, including Croman Mill, Peters Mill and McGrew Brothers Mill.

The Project consists of eight parcels totaling 60.92 acres. The Applicant is seeking approval to develop **three phases consisting of 550 residences and 150,000 square feet of commercial and light-industrial** within a walkable mixed-use, live-work-play community with greenways, parks, hike-and-bike paths, neighborhood retail businesses, light industrial businesses, and a diverse range of single-family and multi-family homes at a range of sizes and prices, including a mix of affordable homes.

This application is aimed at fulfilling **the long-recognized potential of the site of the former Croman Mill**, a timber mill closed in 1996 followed by an environmental cleanup process. It would deliver much-needed housing for the city, including middle housing, workforce housing, and subsidized affordable housing for a broad range of residents, as well as a significant number of jobs in its proposed 150,000 square feet of light industrial and commercial space. Envisioned industries include agriculture-related, tech, craft/value-added food, recreation, sustainability, fire-resilience, health/wellness—enabling a vibrant ecosystem of small businesses and makerspaces. **The addition of housing to the previous zoning is in recognition of the changing needs of the city**, and the widely recognized need to target jobs growth that is more in line with the city’s character, values and market potential.

To accomplish this ambitious goal, the Applicant is seeking a **Type III Legislative Amendment** under the Ashland Municipal Code, which would include Master Plan Adoption and amendments to the Croman Mill District Code (AMC 18.3.2). In addition, the Applicant is seeking a **Type II Planning Approval** that would include approval of the Preliminary Subdivision Plat for Phase One, the associated utility, right-of-way and open space improvements, and several exceptions and adjustments to be established through a Development Agreement.

In support of these actions, the Applicant is seeking concurrent review of the following application materials:

- Master Plan Report, including Illustrative Plan, Regulating Plan, Phasing Plan
- Narrative and Findings of Fact (for both Type III and Type II actions)
- Proposed Amended Zoning Code, markup and clean copies (AMC 18.3.2)
- Phase One Preliminary Plat
- Preliminary Grading Plan
- Preliminary Utility Plan
- Wetlands Report
- Traffic Impact Analysis
- Tree Inventory and Protection Plan
- Update of Economic Opportunities Analysis (showing adequate inventory of employment lands and other land use requirements)
- Draft Development Agreement (for phasing, and for negotiation and finalization of selected deviations from City standards)

While this application seeks legislative action to approve the master plan and amend the district code for the entire site, **the Type II Planning Action for the preliminary plat and outline subdivision only covers the first phase of the three-phase project.** This first phase is proposed to include upgrades to Mistletoe Road as well as a direct connection to Siskiyou Boulevard, in compliance with Oregon Department of Transportation (ODOT) guidance. These improvements are described in more detail herein. The application for an ODOT right-of-way approach permit and grant of access, as well as relevant County permits for a temporary private street, will be sought concurrently.

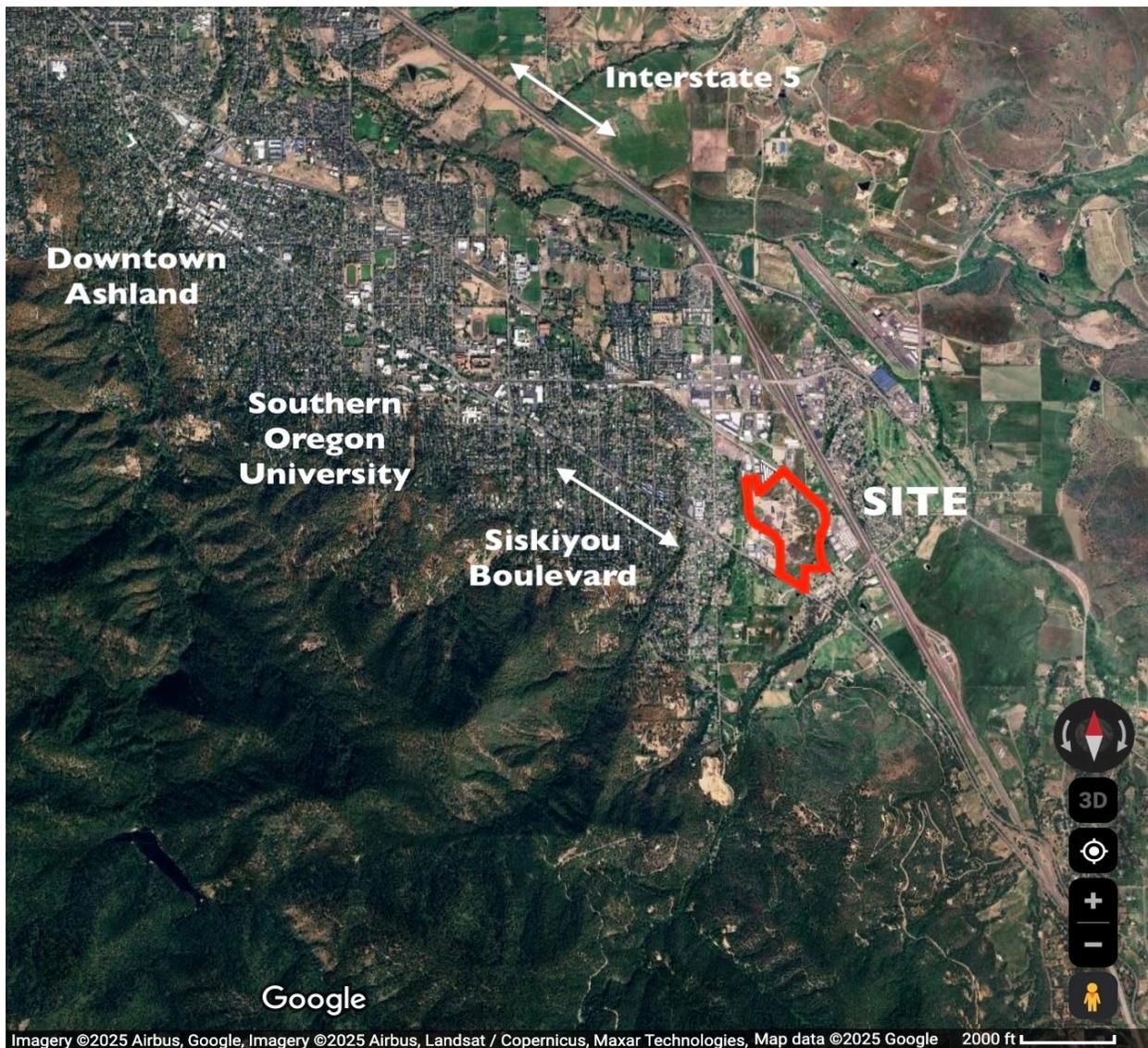
Subsequent to this entitlement, and associated with the second phase of development, the Applicant will be preparing an **Annexation Application for the 6.1-acre parcel at the south end of the property**, the site of a former homestead that adjoined the Croman Mill site and that is part of the master plan for the project. This annexation will also follow under the Type III Legislative Action initiated in Phase One. This subsequent application will consist of a separate Type II Planning Application as well as the annexation application, and associated applications for review.

## 2. Project Location and Existing Conditions

---

## 2.1 Project Location

The project lies at the southern end of the City of Ashland, between Siskiyou Boulevard and Interstate 5 (see map below). It has excellent proximity to Interstate 5 as well as downtown Ashland and Southern Oregon University.



The project is bounded by **Siskiyou Boulevard to the south, Mistletoe Road to the west, and the Central Oregon & Pacific Railroad (CORP) right-of-way to the north and east.** There is a mini-storage unit to the north as well as a property owned by the City of Ashland. There are light industrial properties on the west side of Mistletoe Road, including the current offices of Adroit Construction. Farther to the west is Hamilton

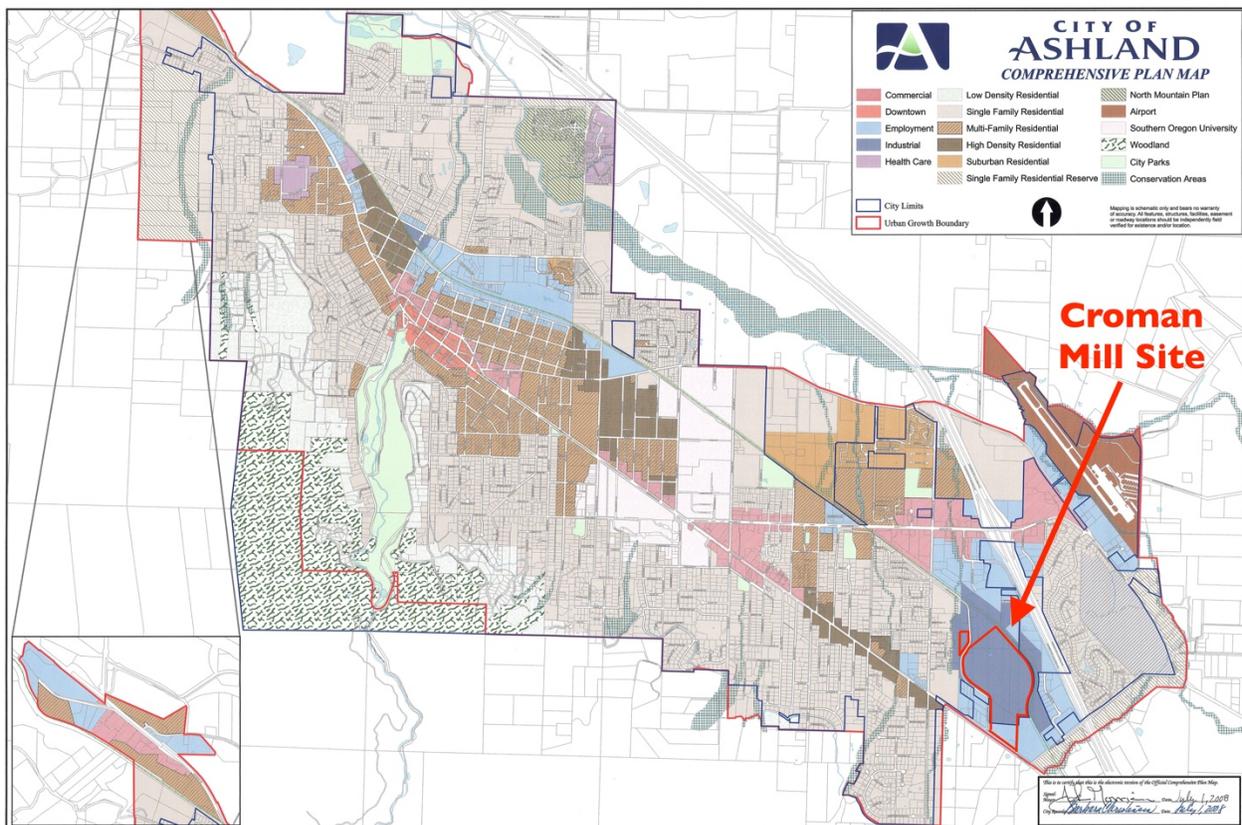
Creek, which is the boundary of a residential neighborhood lying along Tolman Creek Road as well as Bellview Elementary School and Bellview Grange.

East of the property, across the railroad right-of-way, are additional industrial and employment uses as well as Interstate 5. To the southeast of the property is Ashland's Creekside Campground & RV Park.



## 2.2 Comprehensive Plan Designation

The bulk of the site is designated **Industrial** in the City of Ashland's Comprehensive Plan. A small portion that is outside the current city limits (6.1 acres) is designated **Employment**. While residential is allowed within the current Croman Mill zone under certain conditions, an increase in residential use has been contemplated for some years, recognizing the need for more housing. A Comprehensive Plan amendment to a new mixed-use designation is justified to better reflect the shifting needs of the city (as documented by the Applicant's economics research).

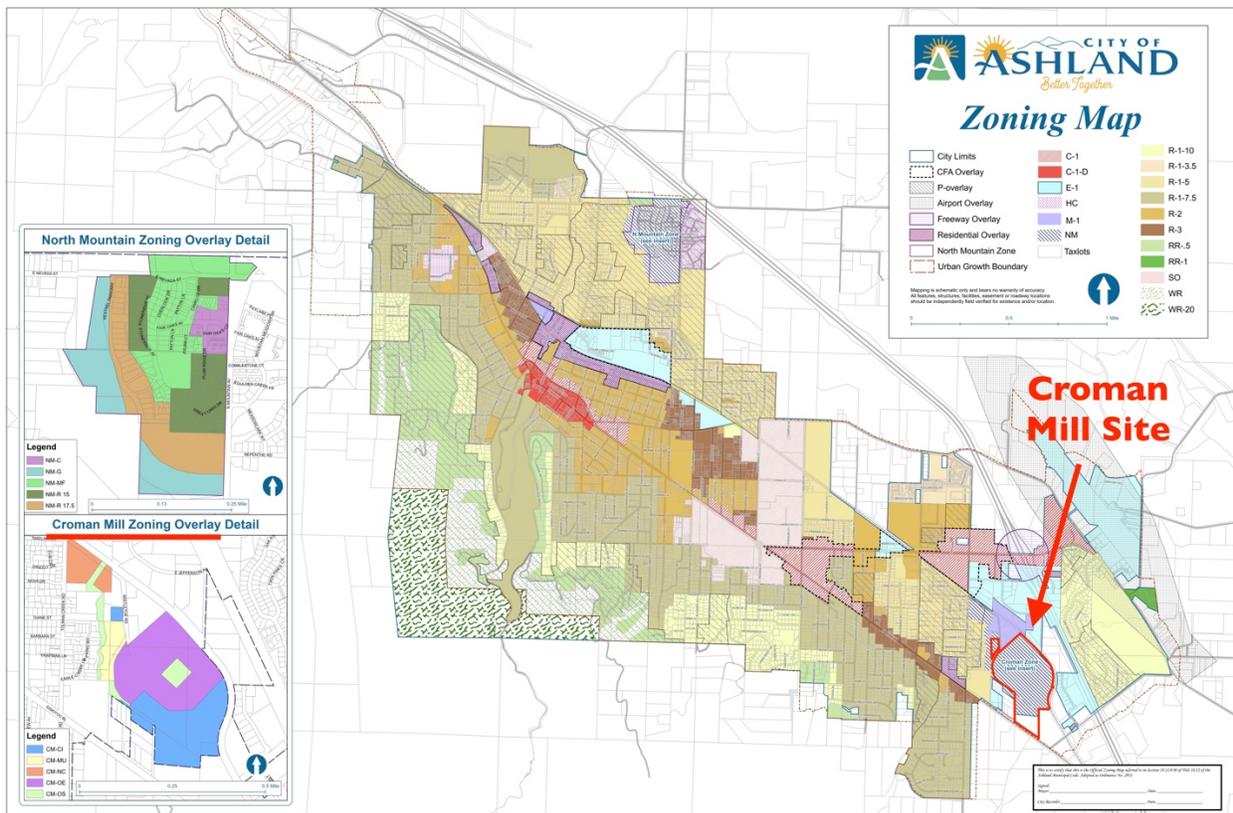


## 2.3 Existing Zoning

The site currently shows in the City Zoning Map as the “**Croman Mill Overlay Zone**”, as detailed in the Croman Mill District Code, AMC 18.3.2. The Croman Mill District Code was adopted in 2010, with these key goals:

- Preservation of employment lands
- Buffering the neighborhood to the west
- Mitigating traffic impacts on Tolman Creek Road
- Preservation of natural areas (creeks, ponds, and wetlands),
- A central open-space element
- Providing a street network incorporating truck, transit, pedestrian, and bicycle access
- Creating a unique identity to improve the visibility of the area

The proposed land use would preserve the current zoning as outlined in the Croman Mill District Code, and would add **two new zones to the site**, as described in the draft revisions to AMC 18.3.2 (appendix).



## 2.4 Existing Land Use

The site is currently vacant, and the current owner, **Croman Corporation**, is in the **process of environmental cleanup** in preparation for the pending sale to Townmakers LLC. Oregon Department of Environmental Quality (DEQ) is permitting and monitoring this process as is the City of Ashland, and Croman Corporation has engaged **SCS Environmental Engineers** to perform associated engineering work. As part of this cleanup process, Croman Corporation's contractors are exporting waste material as well as usable construction products from the site, including rock, gravel, broken concrete, and other related products.



*Google Maps view of the site today, looking northeast from the upper part of Mistletoe Road.*

## 2.5 Past Uses and Historic Resources

The site is a **former timber mill that was in operation from the 1930s until 1996**. A small portion of the site to the south was a single-family residence on a small (6.1 acre) farm. Neither use is operational, and the site has been cleared of all buildings and other structures that could constitute historic resources. Following is a detailed timeline of the site's past uses.

### 1. Pre-Mill Era & Early Uses

Prior to its industrial use, the parcel that became the Croman Mill site appears to have been used for agricultural purposes, though detailed historical records on that phase are sparse.



NEW MCGREW MILL - Members of the press, radio, and television got a first-hand view of the new McGrew Brothers Mill on Mistletoe Road during a press tour yesterday. The group is looking at the log chipper, a machine which chops up scrap lumber. The chips are graded, and then piped into waiting gondola cars for shipment to pulp and paper firms. The burner, utilizing high-pressure air to make a hotter fire and reduce smoke, can be seen in the background. - Tidings Photo

ABOVE: Left, aerial view of the mill in 1962 (photo by the Southern Oregon Historical Society); right, newspaper article about the opening of the mill under the McGrew Brothers' ownership (article by Daily Tidings).

## 2. Beginning of Mill Operations (1934–1946)

The site saw its first sawmill operations beginning around 1934, when Arthur Peters leased the former municipal airport land and established what was initially known as Peters Mistletoe Mill, which included a planing mill and sawmill operations.

## 3. McGrew Brothers Era & Expansion (1965–1982)

In 1965, Arthur Peters sold the operation to McGrew Brothers Sawmill Inc., a well-known follow-on operator based in Medford, led by Elroy "Pink" McGrew and family. This period marked the site's peak: it became Ashland's largest private employer, with nearly 200 workers and wide-ranging sawmilling and planing output. Financial hardship during the late-1970s led McGrew Brothers to bankruptcy by 1982, after which operations ceased under their ownership.

## 4. Transition to Croman Corporation Management (1982–1996)

Croman Corporation, an aviation-based heli-logging company from Medford that had previously supplied timber to McGrew, took over the site in 1982 and continued mill operations under its own name. Croman ran the sawmill and wood treatment facilities until 1996, when broader industry shifts rendered the operation uneconomic, and the mill closed permanently.

## 5. Post-Closure & Environmental Assessment (1996–2011)

Prior to closure in 1987, DEQ (Oregon's environmental agency) had first detected wood-treating chemicals (pentachlorophenol (PCP) and trichlorophenol (TCP) in shallow soils. By 1989, underground fuel tanks had been removed and approximately 12,000 cubic

yards of contaminated soil were excavated under DEQ oversight. Although the mill ceased in 1996, demolition did not begin until 2011, and it took many years for debris and equipment cleanup to begin in earnest

## 6. Redevelopment Planning & Cleanup (2010–Present)

In 2010, the City of Ashland hired planning consultants Crandall Arambula to help develop and adopt the Croman Mill Redevelopment Plan, including provisions for mixed-use, industrial, residential, open space and transit access. Clean-up efforts escalated between 2012 and 2022, during which approximately 1 million cubic yards of mill debris—wood, concrete, asphalt, metal—were removed and sorted from the property.



*Above: photos of the mill around the time of its closing in 1996. Photos by the Croman Corporation.*

## 7. Historic Resources

As noted, there are no remaining historic resources on the site other than concrete slabs and several small remnants of metal parts.

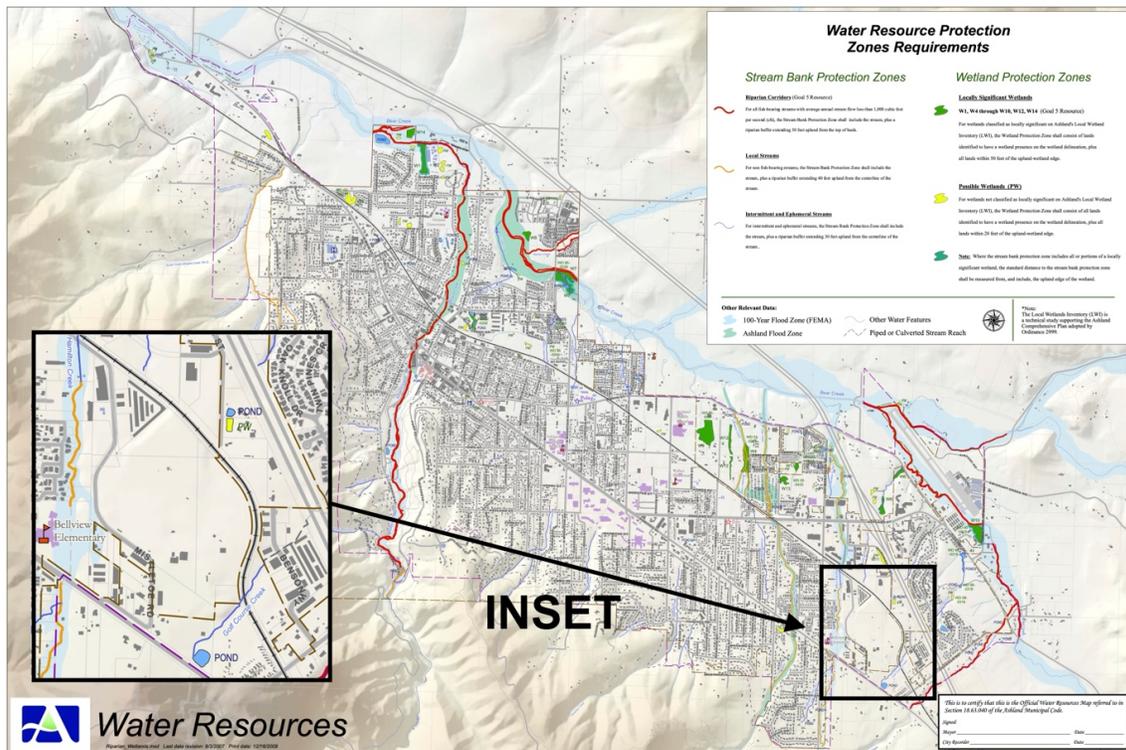


*ABOVE: The site today.*

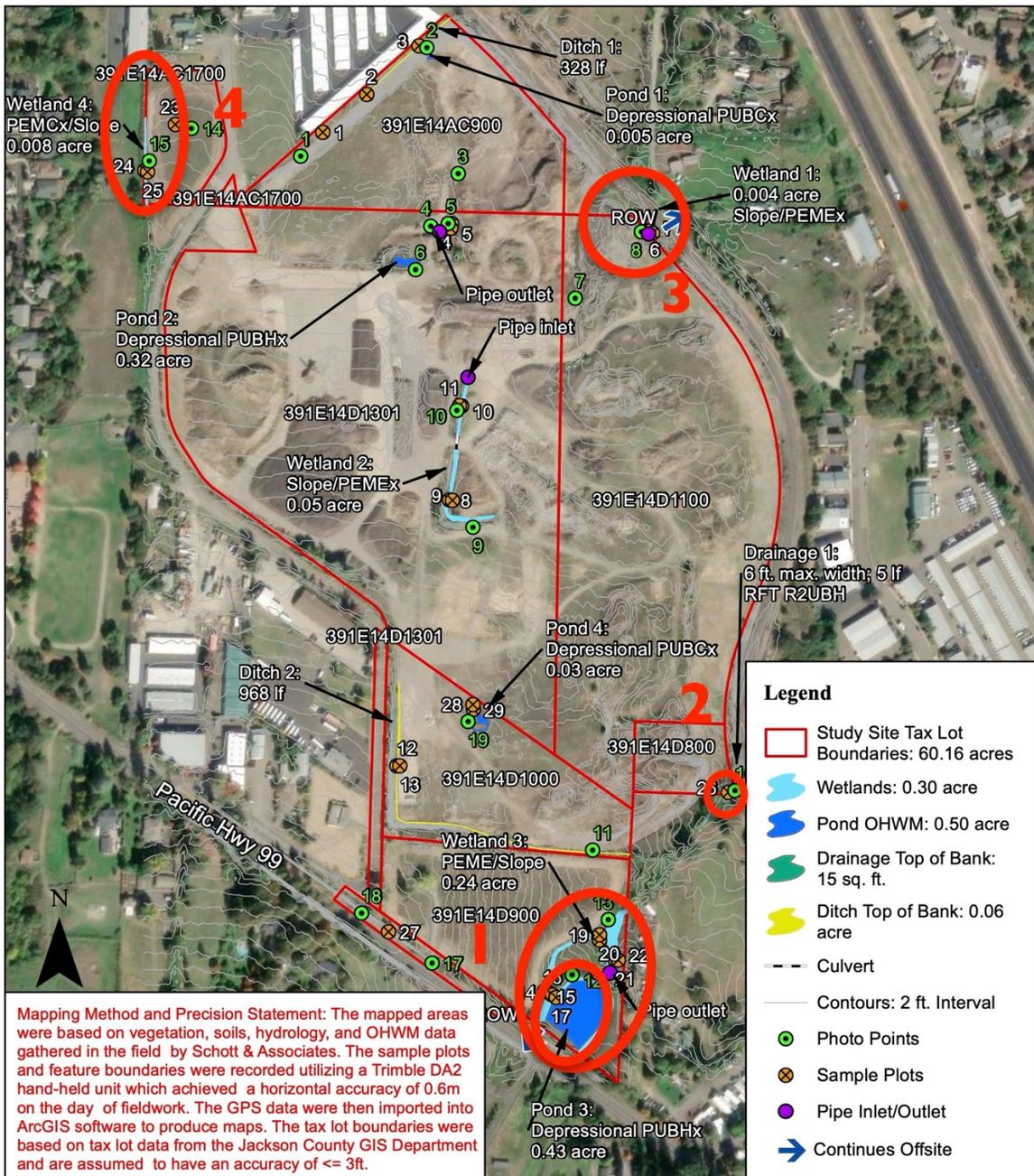
## 2.6 Critical Areas

The site has **no identified geologic hazards, floodplains, or critical wildlife habitats**. The site does have **several wetland areas** as mapped by Townmakers consultants Schott and Associates. Their Jurisdictional Wetland Delineation Report, as well as DSL approval letter, is included in the appendix to this report.

Their analysis finds that, based on vegetation, soils, hydrology, and OHWM data, four ponds, four wetlands, one drainage, two ditches were identified onsite. Two locations were identified as jurisdictional wetlands that are not identified on the Local Wetlands Inventory, and therefore are classified as “Possible Wetlands”, requiring 20 foot buffers from the wetland edge (#s 3 and 4 on the map on the following page). Two locations were identified as part of an intermittent stream, both part of Golf Course Creek and an associated pond (see inset below). This stream will require a 30-foot riparian buffer setback as measured from the center of the stream. These buffer edges have been delineated by Schott and Associates, and they are illustrated on the relevant planning documents (e.g. see Appendix 5, Sheet PL1.4). All planned structures are set back from these buffers.



Following is the delineation map by Schott and Associates as approved by the Oregon Department of State Lands on April 16, 2025:



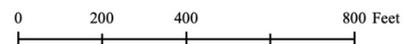
Date: 5/15/2024

Data Source: ESRI, 2024; Jackson County GIS Dept, 2024; DOGAMI, 2009

Figure 6a. Wetland Delineation Map - Overview



Croman Project Site: S&A # 3135



## 2.7 Existing Grading, Utilities, Trees

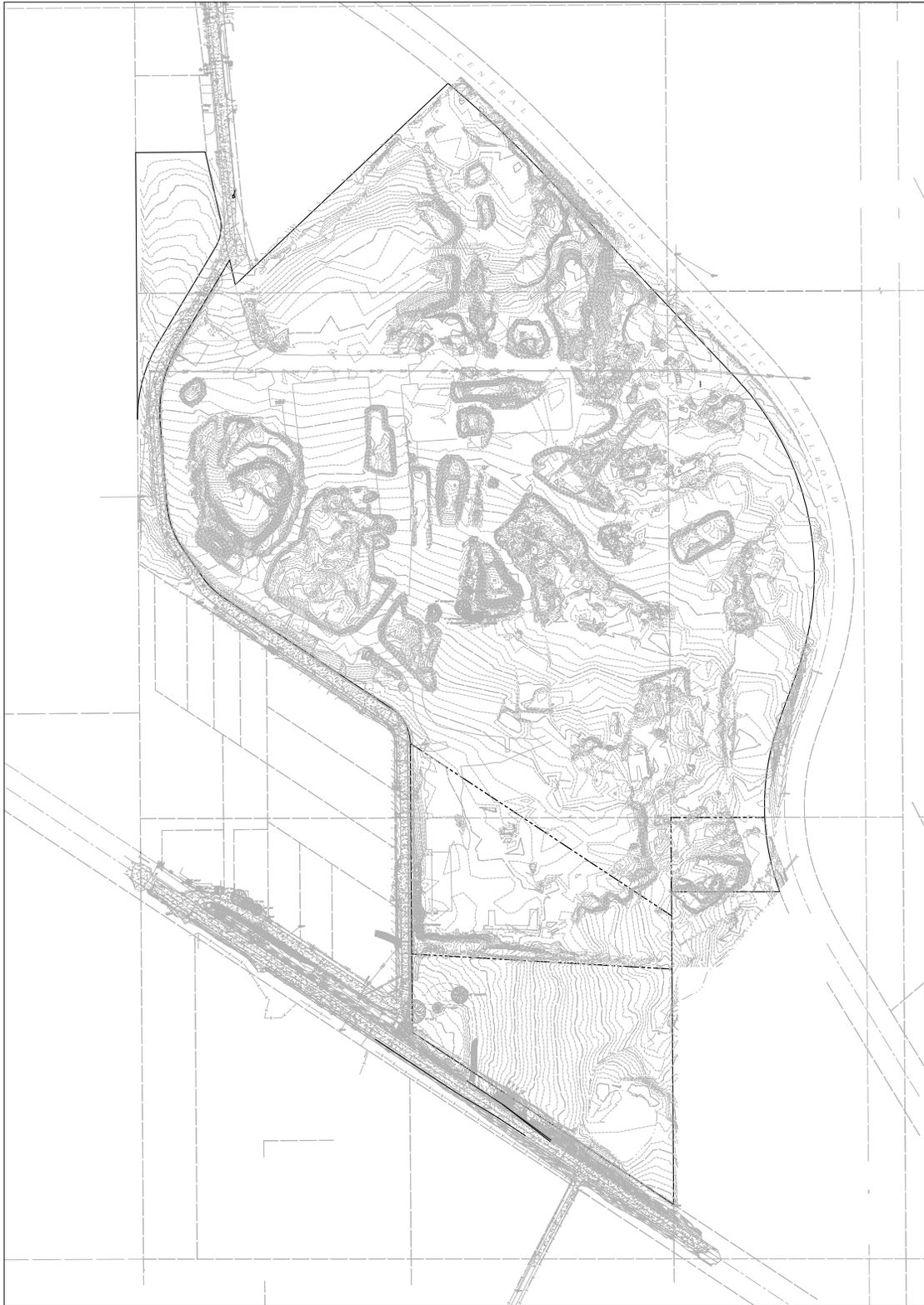
The site has been **extensively disturbed during the era of mill operations**, with a relatively flat slab area for mill operations and a gently sloped area at the former homestead. There is a steep slope between these two areas, with a maximum fall of 23 feet. The only currently undisturbed area is the small pond at the southeast corner of the site, along with its associated wetland stream. The mill area currently has a number of **piles of debris and export materials** that will be removed as part of the cleanup completion. These areas exceed 35% grade in some cases, although they are artificial and temporary. The grading plan will restore the site to close to its original natural grade.

**Utilities are located in Mistletoe Road** to the west of the site. The area infrastructure is sized to accommodate the future development, although a number of offsite improvements will be needed to make the proper connections, as shown in the Preliminary Utility Plan and Public Facilities Impact Assessment.

There is an **overhead power line at the north end of the property**, owned by the City of Ashland Electric Department, that will be relocated underground as part of the development. This power line will also extend to serve the north part of the site when the annexation of the 6.1-acre County parcel is complete. This work has been coordinated with the City of Ashland Electric Department, and they are now working to produce a service plan based on our proposal (see page 43).

There are **a number of trees on the site and along its perimeter**, and several have calipers of 6" or greater. These include a Siberian elm, incense cedar, mulberry, pine, and two cottonwoods. They are identified as trees to be preserved in the Tree Protection Plan that is included in the documents of this submittal.

The Siberian elm is diseased, not native to Oregon, and was recommended for removal by our arborist. However, we will take steps to try to save it, although under the circumstances, we do not propose a full 66-foot tree protection zone. In addition, **there is a cluster of cottonwoods and two madrones** that are not expected to survive, and the arborist has designated them for removal (as shown also on the Tree Protection Plan).



**Parametrix**  
 2022 28th Avenue SE, Suite 100 • Poulsbo, WA 98174  
 PH: 206.895.6800

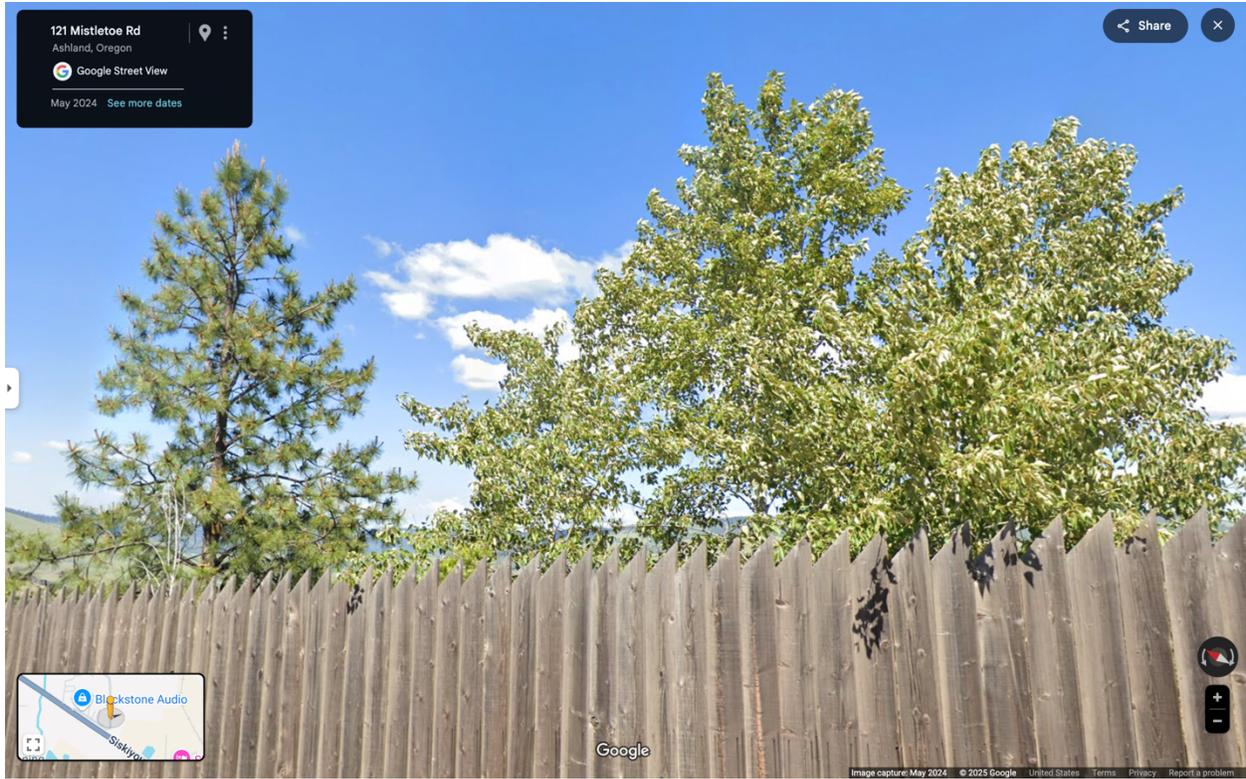


EXISTING SITE PLAN  
 PLAN

*ABOVE: Existing Conditions Plan.*



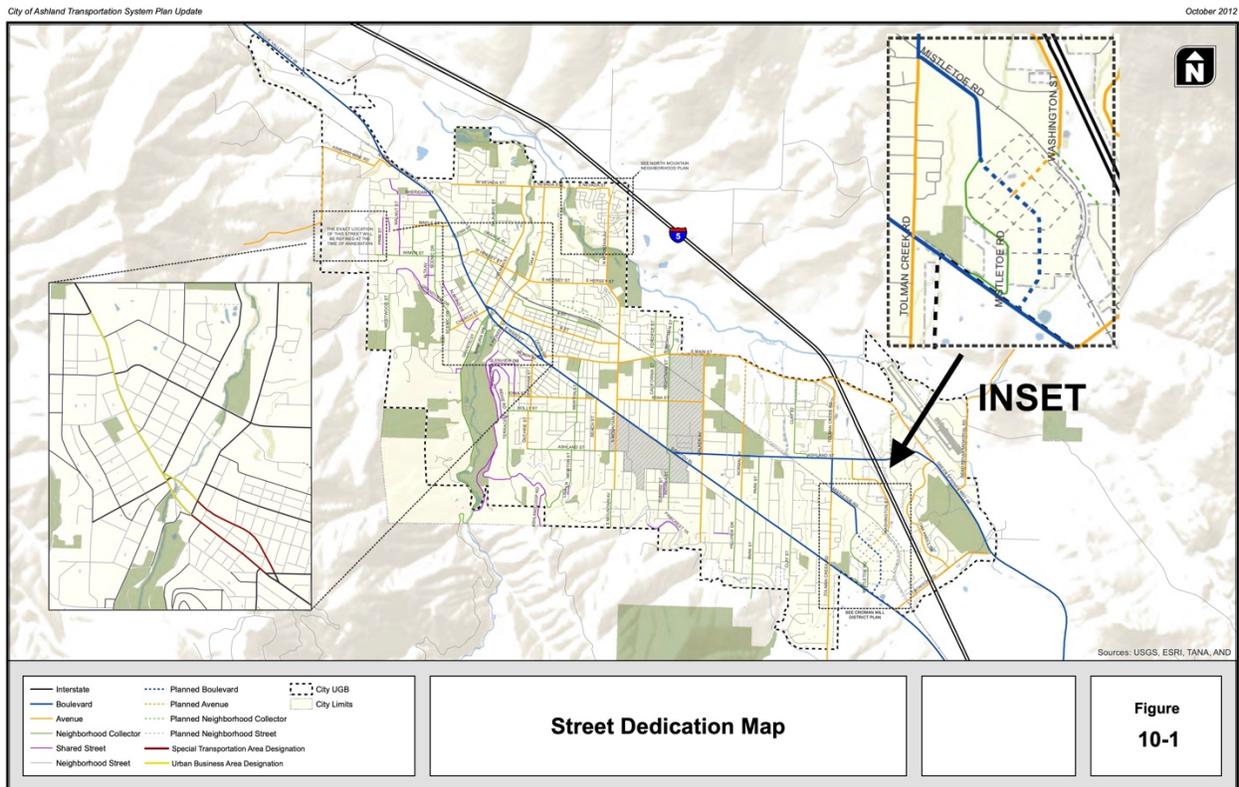
ABOVE (L-R): The mulberry, incense cedar, and Siberian elm.

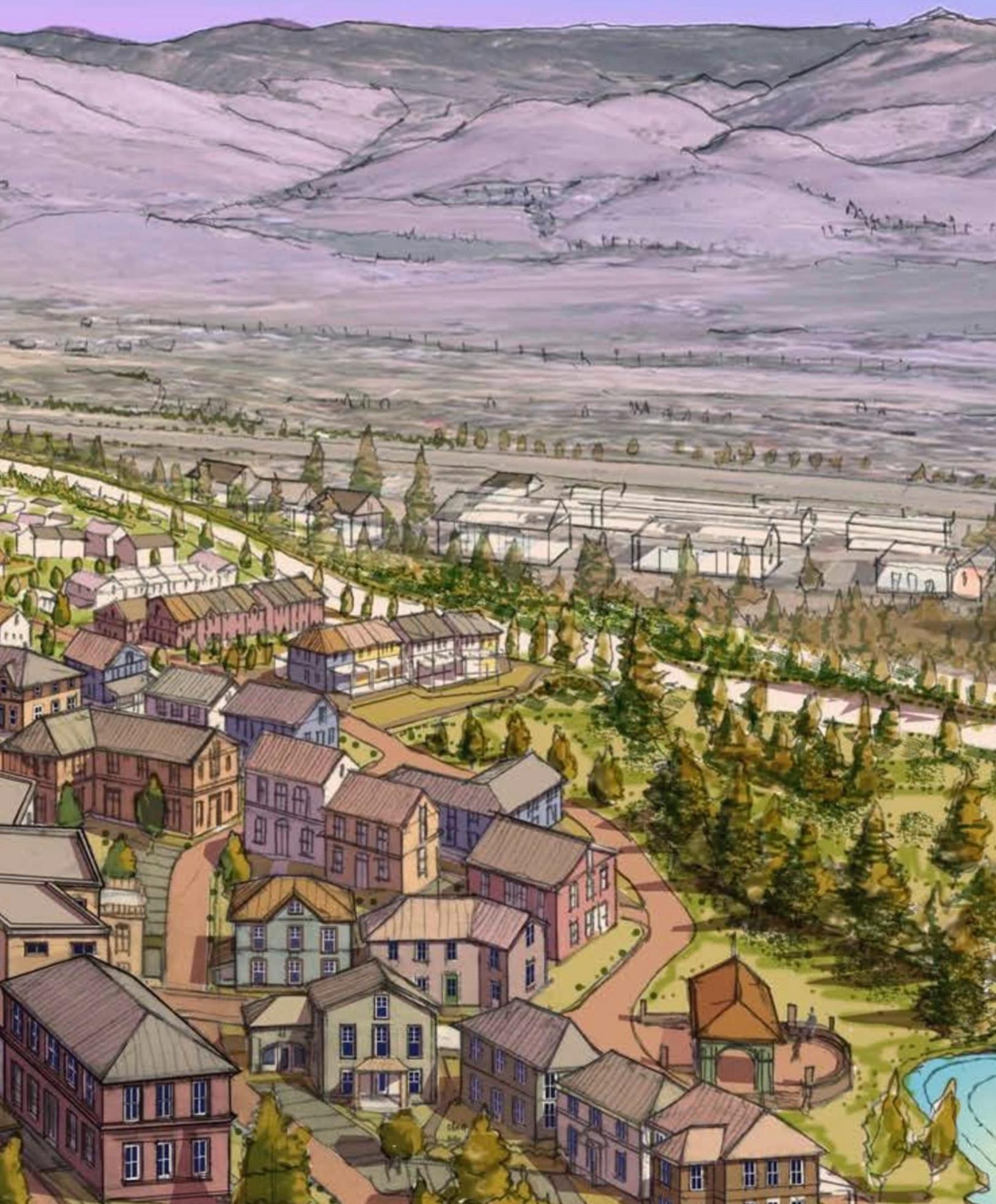


ABOVE (L-R) The pine and two cottonwoods.

## 2.8 Existing Transportation Infrastructure

The site has **excellent access from Mistletoe Road to the east and Siskiyou Boulevard to the south**. Mistletoe Road is classified as a Neighborhood Collector in the City's Transportation System Plan, transitioning to a Boulevard to the north of the Croman Mill site. Siskiyou Boulevard is also classified as a Boulevard. The City's Transportation System Plan shows that a new Boulevard will connect the northern Boulevard segment of Mistletoe to Siskiyou, routed through the Croman Mill area, and a grid of streets will radiate out around this new central boulevard. (This is also the street design concept proposed by the Applicant.)





## 3. Master Plan Elements

---

### 3.1 Land Use

The proposed land use includes 550 homes of diverse sizes and prices and 150,000 square feet of commercial and light industrial, as well as parks, open spaces, pathways, walkable streets, and other public amenities.

The proposed land use is designed to advance the City's long-term planning goals and provide multiple benefits to residents, workers, and the broader community. The proposal reflects the City's values as outlined in the **Ashland Comprehensive Plan, Croman Mill District Code (AMC 18.3.2), Transportation System Plan, Climate and Energy Action Plan**, and other adopted policies. Key features and public benefits include:

#### **Compact, Walkable, Mixed-Use Community**

- **Compact, transit-ready urban form** that promotes walking and cycling, reducing vehicle dependency.
- **Integrated land uses:** A blend of residential, light industrial, and commercial spaces in close proximity encourages internal trip capture, live-work opportunities, and local economic vitality.
- **New subzones:**
  - *Residential – Mixed Use (R-MU)*, for diverse housing types and limited commercial or home business and “live-work” uses.
  - *Compatible Industrial and Commercial – Mixed Use (CIC-MU)*, for light industry, maker spaces, shops, restaurants and offices in a walkable format. Residential uses are also allowed above the ground floor. (A limited exception is when ground-floor accessible units are required.)

#### **Diverse, Attainable and Affordable Housing**

- **550 new homes**, including a mix of apartments, townhomes, and cottages to serve a wide range of income levels and household types.
- Inclusion of **affordable and workforce housing**, in alignment with the City's housing needs, code requirements, and statewide goals.
- Compact residential patterns that promote **resource efficiency and reduced per-capita infrastructure cost**.

## Employment and Economic Development

- Up to **150,000 square feet of commercial and light industrial space** to support local businesses, entrepreneurs, and green industries.
- Creation of **high-quality jobs** within walking distance of housing, helping meet state-mandated employment land needs.
- Strategic reuse of a former industrial brownfield for **productive and sustainable redevelopment**.

## Environmental and Climate Benefits

- **Transit-ready design** supporting future bus service and existing bicycle infrastructure.
- **Street and block structure** encourages short trips by walking and cycling.
- Preservation and enhancement of **natural areas, stormwater features, and the small remaining tree canopy**.
- **Green infrastructure and pervious parking areas** to manage stormwater and reduce urban heat island effects.
- Contributes to the City's **Climate and Energy Action Plan (CEAP)** goals by lowering greenhouse gas emissions through compact land use and transportation alternatives.

## Connectivity and Infrastructure Improvements

- A fine-grained **street grid and trail system** to improve multimodal connectivity within and beyond the site.
- Extension of the **Central Ashland Bike Path**, creating an important regional trail connection.
- Enhanced access to **nearby employment centers**.

## Urban Design and Place-Making

- Buildings and public spaces designed to **human scale**, promoting social interaction and neighborhood identity.
- Creation of **active ground floor uses**, public plazas, and gathering spaces.
- High-quality streetscapes with **trees, landscaping, lighting, and benches** to create an attractive pedestrian environment.

## 3.2 Employment Land and Residential Use

**Two significant changes** have occurred since the adoption of the original Croman Mill District Code (AMC 18.3.2) in 2010. First, the city of Ashland, like other cities, is experiencing **an acute housing crisis and an urgent need for more housing supply**, as well as more diverse and affordable housing. Second, **the market for larger-scale industrial users as contemplated in the original 2010 plan has not materialized**. As a 2022 report by ECONorthwest economics consultants found,

*The fact that the site remains undeveloped 15 years after the adoption of the Croman Mill Master Plan suggests that the master plan and implementing ordinances have not produced the level of industrial / employment market response anticipated.<sup>1</sup>*

ECONorthwest and others have concluded that more locally appropriate, “small-batch” and specialty industrial users (food products, recreational equipment and the like) would be more likely and compatible market targets. In addition, **a shift away from some of the light industrial use to commercial and residential uses – as proposed in the Ashland Mill plan – is justified by the economic analysis.**

Second, the City of Ashland’s Housing Capacity Analysis of 2021, also conducted by ECONorthwest, found that **Ashland will need to provide significant new housing supply**, including multifamily units (35% of new housing), duplex, triplex, and quadplex housing (10% of new housing); and new single-family attached (10% of new housing); and that **“Ashland has unmet needs for affordable housing.”**

Reflecting these findings, **a notable change in the proposed master plan from the previous Croman Mill Plan is an increase in the amount of residential use, and a proportional reduction (but not elimination) of the amount of light industrial use.**

Following are other changes in needs, conditions and opportunities reflected in the proposed zoning code and master plan documents.

### 3.2.1 Evolving Economic Conditions and Market Demand

**Reduced demand for traditional light industrial:** Ashland has seen limited uptake in light industrial development over the past two decades, especially on the Croman site

---

<sup>1</sup> ECONorthwest, 2021. *Economic Diversification Strategy – Ashland Chamber of Commerce*. Available at <https://www.ashlandchamber.com/files/2022AshlandEconDiversificationStrategy.pdf>

itself, which has remained largely undeveloped despite being zoned for employment uses.

**Shift toward mixed-use and service economies:** The regional economy has increasingly emphasized services, technology, small-scale production, and entrepreneurship—uses better supported by flexible zoning that allows both commercial and light industrial activity.

**Remote work and small business growth:** The post-pandemic economy has also seen a rise in remote work, maker spaces, and flexible work environments that blend commercial and light industrial functions in live-work formats.

### 3.2.2 Critical Housing Needs

**Severe local housing shortage:** Ashland, like much of Oregon, faces a housing affordability crisis, with a documented need for more diverse and attainable housing types for workers, families, and retirees.

**Statewide mandates to increase housing supply:** Under Oregon’s statewide land use goals (particularly Goal 10), cities are required to ensure adequate land is available for housing. The Croman site provides a rare opportunity for large-scale infill development.

**Efficient land use and infrastructure investment:** By introducing residential uses, the city makes more efficient use of planned infrastructure and public investment in roads, water, sewer, and transit service to the area.

### 3.2.3 Urban Sustainability and Livability

**Walkable mixed-use development:** Allowing more residential and commercial flexibility supports the creation of a vibrant, walkable neighborhood, where people can live close to jobs, shops, and services, reducing automobile dependence.

**Transit-oriented development (TOD):** The Ashland Mill site is adjacent to hike-and-bike routes and includes future transit-supportive infrastructure. Increasing residential density supports transit ridership and sustainability goals.

**Better public health and social equity outcomes:** Mixed-use neighborhoods with housing diversity are associated with better health outcomes, lower greenhouse gas emissions, and more inclusive communities.

### 3.2.4 Fiscal Responsibility and Economic Resilience

**Improved revenue potential:** Mixed-use and residential development typically generate higher property tax revenue per acre than single-use industrial zones, helping the city maintain services.

**Reduced vacancy risk:** By allowing a mix of uses with flexibility to respond to changing market demand, the city avoids long-term vacancy and underutilization that often plague single-use industrial districts, especially in small cities with limited industrial demand.

**Attractiveness to employers and workers:** Modern employers seek high-amenity, livable environments that attract skilled workers—something better supported by a flexible, mixed-use district.

### 3.2.5 Alignment with Community Vision

**Public input and planning goals:** The revised plan reflects public feedback and long-range planning priorities, including sustainability, affordability, and compact urban form as described in Ashland’s Comprehensive Plan and Climate & Energy Action Plan.

**Support for entrepreneurship and innovation:** Flexible zoning supports creative economic development, such as local food production, co-working hubs, clean-tech startups, or arts and cultural businesses.

### 3.2.6 Alignment with State Buildable Lands Requirements and City Employment Goals

Economic research conducted by the Applicant’s consultant found the proposed reallocation of land uses at the Croman Mill site—reducing industrial/office land in favor of a mixed-use blend of residential, office, commercial, and light industrial—would be **consistent with both the State of Oregon’s land use requirements and the City of Ashland’s planning goals.** An addendum to the City of Ashland’s Economic Opportunities Analysis (EOA), prepared by economist Jerry Johnson of Johnson Economics LLC (included in the Appendix), evaluated the proposed land use reallocation at the Croman Mill site and concluded that the revised plan is appropriate and consistent with both state and local planning objectives.

The City of Ashland is required under Oregon state law to maintain an adequate supply of buildable lands for employment, including industrial and office uses. However, the

updated analysis found that the City already has more than sufficient industrial and office land available to meet foreseeable needs. Specifically, the citywide inventory reflects **a surplus of 101.6 buildable acres of industrial and office land**. Even if the entire 61.1-acre Croman Mill site were rezoned away from industrial and office uses, **a surplus of 40.5 buildable acres would remain**, demonstrating that the City’s obligations under state law would still be fully met.

At the same time, the analysis identified **a modest deficit in commercial land—specifically retail, office, and health-related space**—amounting to approximately 3.6 acres. The proposed plan, which includes light industrial, office, and commercial uses alongside residential development, provides a flexible and economically responsive framework to meet this demand.

Importantly, **the City of Ashland also has goals related to employment generation and economic development** that go beyond minimum state land use requirements. The revised Ashland Mill plan supports those goals by retaining employment capacity while also responding to urgent housing needs identified in the City’s 2022 Housing Needs Analysis. The plan proposes to create a “live-work-play” environment that integrates compatible housing with employment and commercial opportunities, fostering a vibrant and competitive district for both workers and businesses. **This approach aligns with current economic trends, including the rise of remote work, home-based businesses, and live-work spaces**, which have become more prominent since the COVID-19 pandemic and are likely to persist.

To evaluate employment capacity, **Johnson Economics is recommending employment density targets of 18 employees per acre for light industrial, office, and retail zones, and 6 employees per acre for residential zones**. Notably, the relatively high employment yield from residential land reflects the increasing prevalence of remote work and home-based enterprises. **Under the proposed development formula—allocating one-third of the site to light industrial, office, and retail, and two-thirds to mixed-use residential—the projected average employment density for the entire site is approximately 10 employees per acre**. This level is considered reasonable and consistent with the City’s employment goals.

### 3.3 Phasing of Employment Land

Following the analysis of economist Jerry Johnson on fulfilling the employment land requirements of State land use law as well as City employment goals, the proposed master plan commits to delivering a minimum threshold of **150,000 square feet of shovel-ready light industrial or commercial land (lot area)** in each phase prior to the commencement of residential in the subsequent phase. The City would be assured of delivery of a minimum of buildable employment land in each phase as the project is built out. Target employment density per Jerry Johnson’s memo is 18 per acre for light industrial and commercial, and 6 per acre (reflecting an increase in home-based businesses and work from home).

In a follow-up memo, Jerry Johnson noted:

*With shovel-ready sites, and with appropriate recruitment and marketing efforts, I believe [the project] will be well-positioned to capture the maximum potential market response with a competitive offering.*

In addition, the Applicant would commit to delivering a minimum threshold of ten subsidized affordable housing units in each phase, targeted at 80% of Area Median Income (as discussed further below). The Applicant is in encouraging talks with affordable housing developers to deliver many more units, but cannot commit to a larger number given the realities of finance, markets and costs.

Therefore, the formula would be as follows:

	<i>Minimum Employment Land Area<sup>2</sup></i>	<i>Maximum Housing Area<sup>3</sup></i>	<i>Minimum Affordable Units (80% AMI)<sup>4</sup></i>
Phase 1	150,000 SF	300,000 SF	10
Phase 2	150,000 SF	300,000 SF	10
Phase 3	(n/a) <sup>5</sup>	(Maximum Per Entitlement)	(n/a) <sup>6</sup>

<sup>2</sup> Net lot areas served by completed infrastructure. Surpluses carry over to reduce required minimums in subsequent phases.

<sup>3</sup> Net lot areas served by completed infrastructure (number of units to be determined per density parameters)

<sup>4</sup> Minimum required per phase before proceeding to the next phase, but separate from overall minimums as outlined below

<sup>5,6</sup> (Last phase would not have minimum conditions for subsequent phases)

### 3.4 Affordable Housing: Baseline and Target

As documented by ECONorthwest and other economics analysts, the city of Ashland is **experiencing an acute shortage of affordable housing as well as diverse housing to meet actual needs.** The City’s Housing Production Strategy finds that “Ashland will need more attached and multifamily housing in the future than the current housing stock provides... and increased demand for affordable housing for families, both for ownership and rent.”<sup>6</sup>

The Ashland Municipal Code also requires a percentage of income-restricted affordable housing when a site is rezoned, or when a site is annexed into the city. Typically that requirement is for **25% of the number of units at the zone’s base density to be affordable by a household earning 100% of area median income (AMI) or less**, with a somewhat lower number for units that are affordable by households at 80% of AMI or less.

Therefore, the master plan proposes the following forms of housing:

- Multi-family rental
- Accessory dwelling units and small “carriage houses” (for sale or rental)
- Rowhomes (for sale or rental)
- Smaller and larger cottages and multiplexes (for sale or rental)
- Income-restricted affordable housing at the required minimums
- Additional income-restricted housing totaling up to 30% of all homes, depending on partners and funding

#### 3.4.1 Calculation of Base Density

The Croman Mill zone currently does not have a base density. Since the Ashland Mill plan proposes a blend of lower-density single-family detached, mid-density rowhouse and multiplexes, and higher-density multi-family units, the plan proposes a similar blend of base densities from the existing six residential zones in Ashland. They are:

- R-1-10 (Large-Lot Single Family): 2.4 dwelling units per acre (DU/AC)
- R-1-7.5 (Standard Single Family): 3.6 DU/AC

---

<sup>6</sup> ECONorthwest, 2021. *City of Ashland Housing Production Strategy*. Available at [https://econw.com/wp-content/uploads/A67-Final\\_Ashland\\_HPS.pdf](https://econw.com/wp-content/uploads/A67-Final_Ashland_HPS.pdf)

- R-1-5 (Small-Lot Single Family): 4.5 DU/AC
- R-1-3.5 (Cottage Housing/Compact Single Family): 7.2 DU/AC
- R-2 (Low-Density Multi-Family): 13.5 DU/AC
- R-3 (High-Density Multi-Family): 20 DU/AC

The blend or average of these established residential base densities is 8.53 DU/AC. **Therefore, the Ashland Mill Master Plan proposes a base density of 8.5 DU/AC.**

### 3.4.2 Definition of Maximum Density

In the current Ashland Municipal Code, base density is the maximum density allowable without density bonuses. For decades, Ashland—like many U.S. cities—has regulated housing capacity primarily through unit-per-acre caps (“base density”) plus discretionary “density bonuses.” While well-intended, **this framework is increasingly misaligned with State of Oregon housing laws and contemporary best practice.** It can unintentionally suppress compact, efficient infill by turning needed homes into negotiable “bonuses,” rather than by-right outcomes that meet clear performance standards. Evolving state policy now emphasizes more homes of diverse types, climate-friendly compact places, and predictable, form- and infrastructure-based standards over legacy unit caps.

For this reason, the Ashland Mill Master Plan proposes that **maximum density be governed only by infrastructure service capacity**, and by the limitations of form-based zoning (height, setbacks, etc). The total maximum for the project in this proposal is **550 residential units**. Therefore, “base density” in the proposed rezoning under the amended AMC 18.3.2 will not be the maximum allowable density. Rather, it will be **the baseline figure the City uses to calculate affordable housing obligations, open space requirements, and related entitlements** in the Ashland Mill development.

### 3.4.3 Calculation of Buildable Land

The City of Ashland calculates buildable land after excluding all streets and public rights of way, wetlands, floodplains and critical areas, and spaces required for parks public facilities. In the Ashland Mill Master Plan, there is an extensive network of streets, alleys, greenways and public spaces that, upon recording of the plat, will become unbuildable. For this reason, **the Ashland Mill Master Plan proposes that these areas all are treated as deductions from the buildable areas of the project.**



Above left is an exhibit showing the extensive greenways and open spaces (totaling 18% of the total site). Above right is an exhibit showing the total remaining areas of buildable land, totaling 980,677 square feet or 22.5 acres.

### 3.4.4 Calculation of Baseline Affordable Housing

Based upon the foregoing data, the requirement for 25% of base density works out to the following calculations of required income-restricted affordable (at 100% of AMI or lower) by phase:

	<i>Area</i>	<i>Acres</i>	<i>Base @ 8.5 (Rounded)</i>		<i>At 25%</i>
<b>Phase One</b>	<b>428,771</b>	<b>9.84</b>	<b>83.67</b>	<b>84</b>	<b>21</b>
<b>Phase Two</b>	<b>158,077</b>	<b>3.63</b>	<b>30.85</b>	<b>31</b>	<b>8</b>
<b>Phase Three</b>	<b>393,829</b>	<b>9.04</b>	<b>76.85</b>	<b>77</b>	<b>20</b>
<b>TOTAL</b>	<b>980,677</b>	<b>22.5</b>	<b>191</b>	<b>192</b>	<b>49</b>

It should be stressed that these are **minimum commitment numbers for the master plan**, and the target will be **30% of all 550 units (165 units)**. However, this higher number is dependent on uncertain funding and political conditions at the national and state level. **It would be imprudent of the development team to commit in advance to a higher number**, and indeed it could **threaten the viability of the entire project** – on a site that has remained undeveloped for almost three decades, and at a time when the city has critical needs that could be at least partially met if development were to proceed.



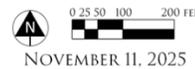
ASHLAND MILL YIELD BY PHASE				
	PHASE ONE	PHASE TWO	PHASE THREE	COMBINED
Single Family Detached	41	25	50	116
Single Family Attached	50	17	23	90
Carriage Houses	15	31	27	73
Multi-Family	84	73	102	259
<b>TOTAL</b>	<b>190</b>	<b>146</b>	<b>202</b>	<b>538</b>
Retail	-	30,000	5,000	35,000
Hotel	-	40,000	-	40,000
Wellness Center	-	25,000	-	25,000
Light Industrial	25,000	18,000	55,000	98,000
<b>TOTAL</b>	<b>25,000</b>	<b>113,000</b>	<b>60,000</b>	<b>198,000</b>

- MIXED-USE COMMERCIAL
- LIGHT INDUSTRIAL BUSINESS
- APARTMENTS
- CARRIAGE HOUSES (ADUs)
- SINGLE FAMILY ATTACHED
- SINGLE FAMILY DETACHED

# ASHLAND MILL

## ILLUSTRATIVE MASTER PLAN

- TOWN MAKERS LLC -



NOVEMBER 11, 2025

QAMAR AND ASSOCIATES INC. URBAN DESIGN      TOWN DEVELOPMENT      STRUCTURA NATURALIS INC. URBAN PLANNING  
 CRABTREE GROUP : CIVIL ENGINEERING      TERRAIN LANDSCAPE ARCHITECTURE      - PARAMETRIX INC. - CIVIL ENGINEERING

### 3.5 Illustrative Master Plan

The proposed master plan (opposite page) largely follows the essential concept of the 2010 plan (below), which features a grid radiating out from a new central boulevard extending from Mistletoe Road to the north down to Siskiyou Boulevard to the south. The boulevard and grid both rotate as they proceed south. At the center of the grid is a prominent park space.

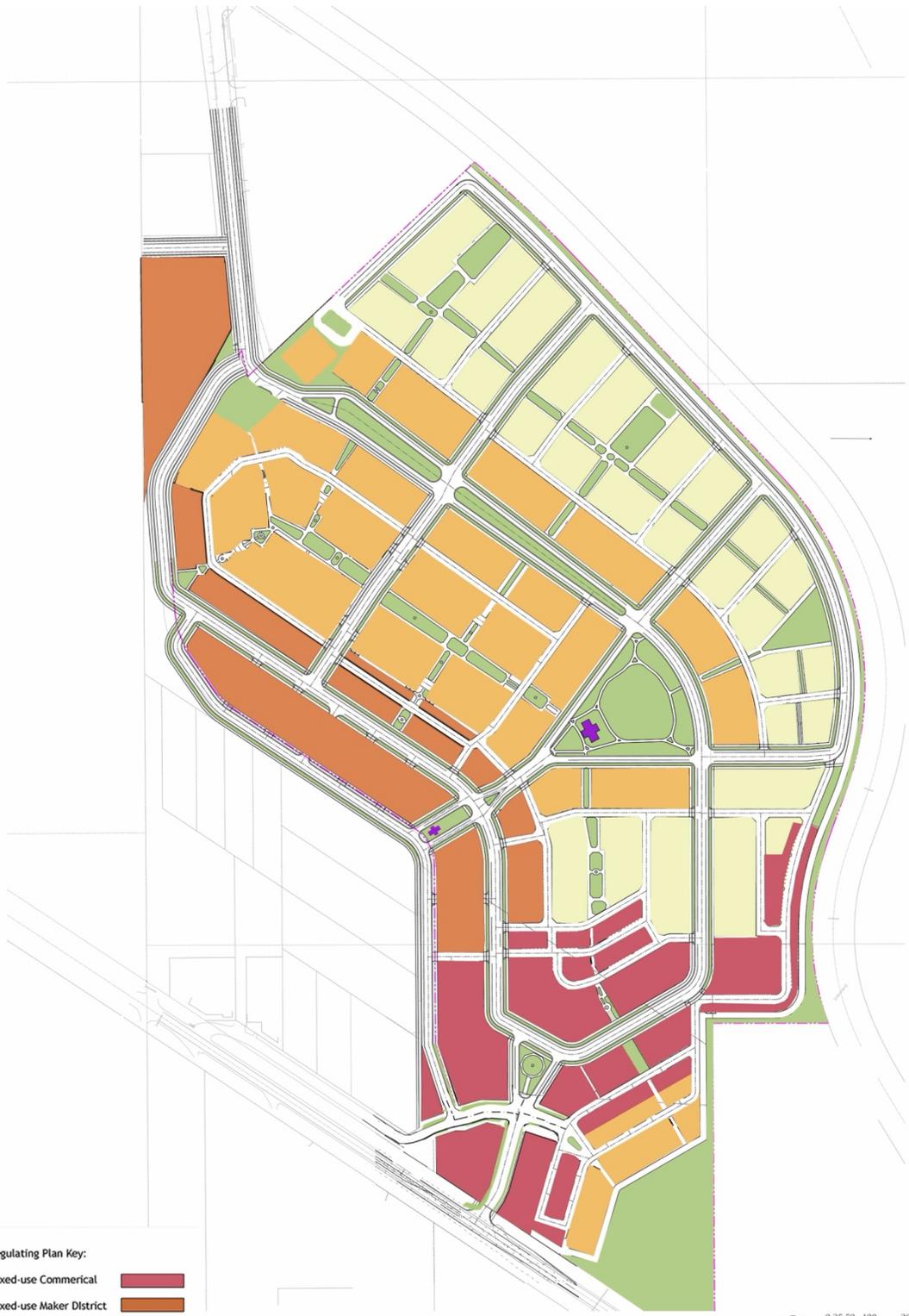


In the 2010 plan, as in the Townmakers plan, the existing Mistletoe Road would be a narrower and lower-traffic street by comparison. This segment would remain a Neighborhood Commercial Collector under the City’s classification system, whereas the northern segment would become a Boulevard, joining with the new central Boulevard running down to Siskiyou. **The existing Mistletoe will extend down to Siskiyou as well, creating a connection and eliminating the dangerous “gooseneck” that has been a concern of the Oregon Department of Transportation (ODOT) for some years.** (This work would be permitted through ODOT as well as the County, since the annexation process will still be pending.)

ABOVE: The 2010 Plan.

This additional segment will be built as part of Phase One, providing connectivity to Siskiyou boulevard and alleviating traffic on the “gooseneck” segment of Mistletoe.

While the land uses would shift markedly from the 2010 plan for the Townmakers site, the other offsite land uses shown to the northwest and southeast – Mixed Use, Open Space and Neighborhood Center – would remain the same as in the 2010 plan, unless and until it was modified by those owners, stakeholders and the City. Commercial uses would cluster near Siskiyou Boulevard for maximum visibility, and mixed-use light industrial would remain aligned with the existing Mistletoe as well as a new parallel street to be built within the project. From there, residential uses would extend to the east and northeast, gradually transitioning from higher-density to lower-density uses.



- Regulating Plan Key:
- Mixed-use Commercial
  - Mixed-use Maker District
  - Medium Residential
  - Low Residential



# ASHLAND MILL

## REGULATING PLAN

QAMAR AND ASSOCIATES INC. - URBAN DESIGN    TOWN MAKERS LLC - TOWN DEVELOPMENT    STRUCTURA NATURALIS INC. - URBAN PLANNING  
 CRABTREE GROUP : CIVIL ENGINEERING    PARAMETRIX INC. - CIVIL ENGINEERING

### 3.6 Regulating Plan

The regulating plan (facing page) provides more detail about the breakdown of uses, and guides the more detailed planning and development of building types. The red zone shows “Mixed Use Commercial” which is a sub-component of the proposed CIC-MU zone. The dark orange zone shows “Mixed Use Maker District,” which may include light industrial, mixed-use residential, live-works, accessory dwellings over parking, and other innovative employment uses. As prescribed by the zone, the only major restriction is that the ground floor must be an employment use or related to the employment uses (e.g. open tuck-under parking).

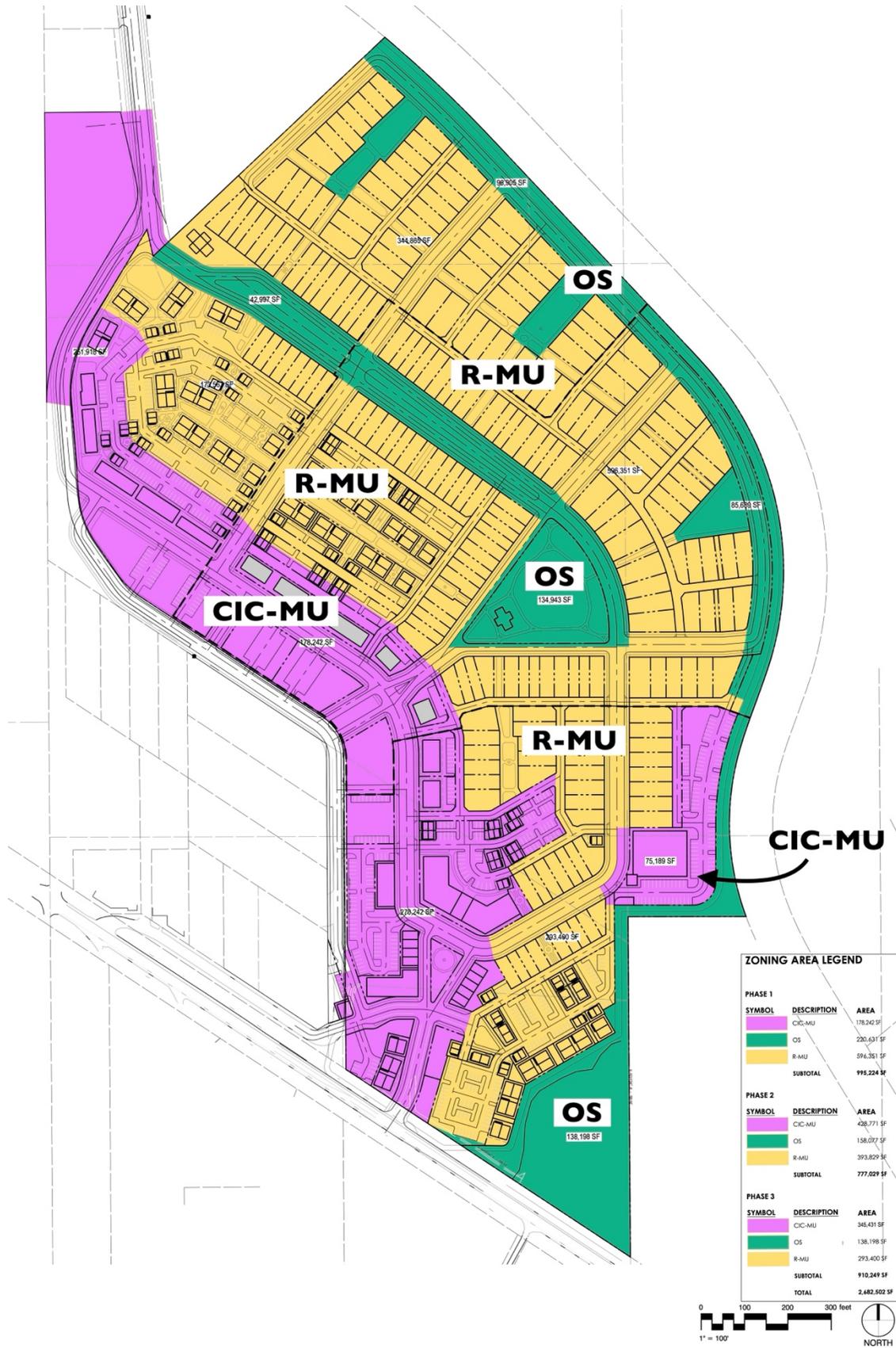
The light orange zone, “Medium Residential,” may include small apartment buildings, rowhomes, carriage houses (ADUs), multiplexes, and other forms of “middle housing”. These may also include subsidized affordable homes, depending on evolving contractual relationships with site developers specializing in the complex world of affordable housing finance.

The yellow zone is “Low Residential,” which typically includes single-family cottages that may also have their own accessory dwelling structures. These cottages may also cluster into cottage courts or “pocket neighborhoods.”



*ABOVE: Greenway at Seabrook, Washington.*

An important part of the illustrative plan and regulating plan is the presence of greenways (long thin green areas) onto which residences front, as an alternative to streets. Their rear parking areas are served by alleys or (in the case of multi-family) by drive aisles. Addressing and emergency access also occurs from these vehicular sides. This “greenway-laneway” concept has been used effectively at other projects with which the team is associated, including Seabrook, Washington (image at left).



### 3.7 Proposed Zoning Map

The facing page shows the proposed zoning for the Ashland Mill sub-district within the Croman Mill district, conforming to the land uses described previously. Mixed use is a paramount goal of the project, as is the need to maintain a dynamic, market-facing position that can seize opportunities as they evolve. The existing zones in the Croman Mill District zoning code (18.3.2) remain as is. **Only two additional mixed-use zones are proposed, and only for the Ashland Mill site:**

**CIC-MU: Compatible Industrial and Commercial – Mixed Use.** This zone allows residential on upper floors, but requires employment-generating commercial or light industrial uses on ground floors. Accessory dwelling units are also allowed over parking spaces that are integrated into the CIC-MU zone. The “compatible” industrial refers to smaller light industrial users whose operations will not unduly disrupt the residents of the areas to the east and northeast. Residences can also be located over these light industrial uses, so long as the owners execute hold harmless covenants and agreements stating they shall not protest impacts from commercial and industrial uses within the zone. This zone totals approximately 21.9 acres (34.6% of the site).

**R-MU: Residential - Mixed Use.** This is the primary residential zone, targeted at a gross density of 15 dwelling units to the acre. It includes cottages, rowhomes, carriage houses, apartments, and other forms of “middle housing.” It also allows some neighborhood commercial and live-work activities, with certain restrictions. This zone totals approximately 28.4 acres (46.6% of the site).

The third zone on the site is already existing in the Croman Mill District code:

**OS: Open Space.** This includes the central park, the pond and wetlands to the southeast, the median parkway area along the central boulevard, several small pocket parks north of the central park, and the full length of the eastern hike-and-bike trail (part of the Central Bike Path). This pathway would be privately owned but with a public pedestrian and bike easement along its length. (This was done at Southern Oregon University and is expected at other segments of the path.) This zone totals approximately 11.4 acres (18.8% of the site).



- MIXED-USE COMMERCIAL
- APARTMENTS
- SINGLE FAMILY ATTACHED
- SINGLE FAMILY DETACHED
- LIGHT INDUSTRIAL BUSINESS

## ASHLAND MILLS PHASING PLAN



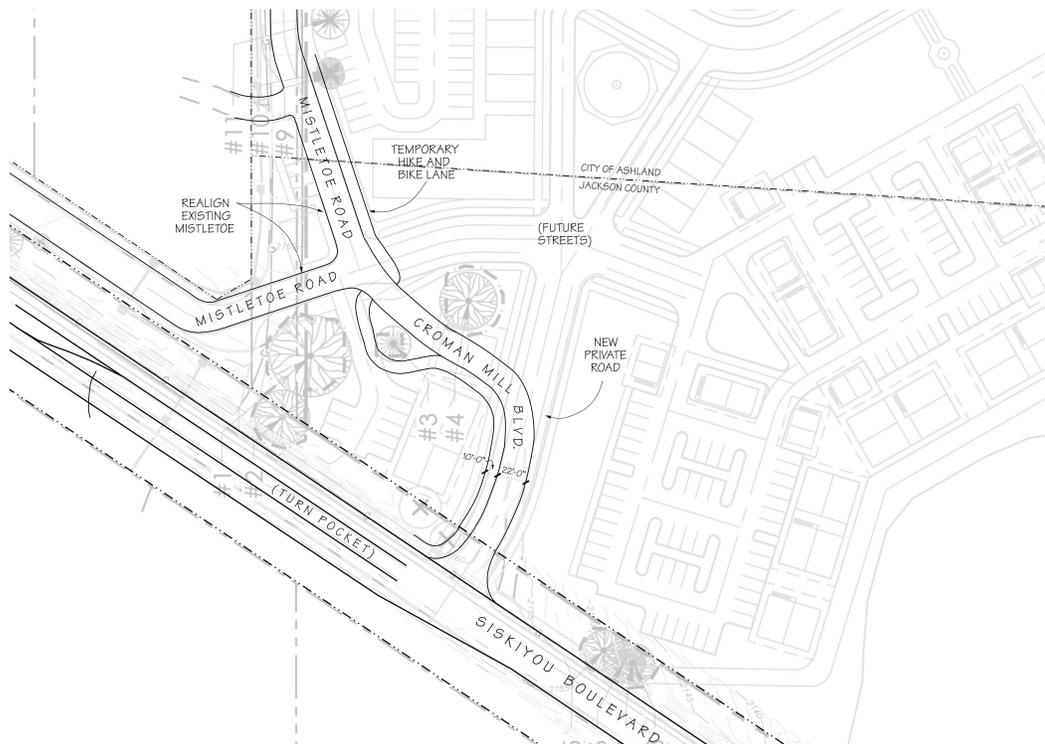
QAMAR AND ASSOCIATES INC. - URBAN DESIGN    TOWNMAKERS LLC - TOWN DEVELOPMENT    STRUCTURA NATURALIS INC. - URBAN PLANNING  
 CRABTREE GROUP : CIVIL ENGINEERING    PARAMETRIX INC. - CIVIL ENGINEERING

### 3.8 Proposed Phasing Plan

The phasing is planned to achieve an orderly and market-facing sequence. Three roughly equal phases would proceed from the middle of the site to the south, and then to the north. The first phase would include a representative mix of employment land and light industrial, as well as multi-family, single-family attached, and single-family detached.

Phase One would include improvements along Mistletoe as well as the connection from Mistletoe to Siskiyou, following the scenario preferred by Oregon Department of Transportation (ODOT) to help alleviate the problematic “gooseneck” connection that currently exists. (As noted previously, this permitting would proceed concurrently through ODOT and Jackson County, with involvement by local owners and stakeholders as well as the City; these agencies will provide memos in support via separate cover.)

The segment of street that extends from the existing Mistletoe to Siskiyou is shown in the figure below (as discussed and supported by ODIT and the County). The Mistletoe segment will be developed to full buildout standards, while the remaining segments running through County land (prior to annexation in Phase II) will be developed as temporary private streets in accordance with emergency responder requirements.



Phase One would also include the central park, which will remain a non-dedicated open space in accordance with the City of Ashland Parks Department’s stated requirements. It will have a public easement allowing use by members of the public.

Phase Two would include the 6.1-acre annexation area to the south, through relevant applications and hearings as well as the preliminary plat under a Type II Planning Action. It would see completion of the retail area near Siskiyou Boulevard as demand grows. Several potential users are already in talks with Townmakers LLC, including a grocery store, hotel, and wellness complex (clinics, spa, etc).

Phase Three would see the final buildout of residential and light industrial, with an expected small component of neighborhood retail (to be determined based on market dynamics). Following is a summary of the uses, areas and unit counts by phase:

<b>Ashland Mill Yield by Phase</b>				
	PHASE ONE	PHASE TWO	PHASE THREE	COMBINED
Single Family Detached	41	25	50	116
Single Family Attached	50	17	23	90
Carriage Houses	15	31	27	73
Multi-Family	84	73	102	259
<b>TOTAL</b>	<b>190</b>	<b>146</b>	<b>202</b>	<b>538</b>
Retail	-	30,000	5,000	35,000
Hotel	-	40,000	-	40,000
Wellness Center	-	25,000	-	25,000
Light Industrial	25,000	18,000	55,000	98,000
<b>TOTAL</b>	<b>25,000</b>	<b>113,000</b>	<b>60,000</b>	<b>198,000</b>

### 3.9 Preliminary Utility and Mass Grading Plans

The team has completed preliminary designs for the mass grading and utilities on the site, and has conducted a public facilities impact assessment of the adequacy and feasibility of the existing infrastructure (see “Utility Feasibility Technical Memo” in the appendix documents). Scaled drawings are also included in the Appendix.

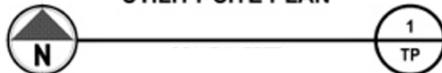


**Parametrix**  
3210 15th Avenue SE, Suite 100 • Federal Way, WA 98003  
PH: 206.466.6500





**PRELIMINARY  
UTILITY SITE PLAN**

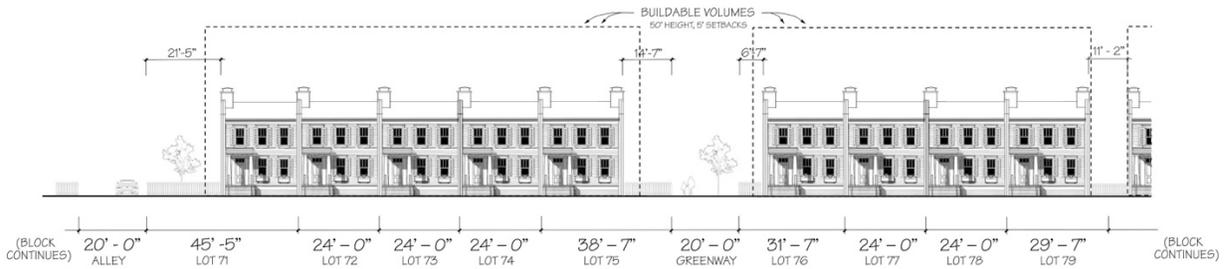




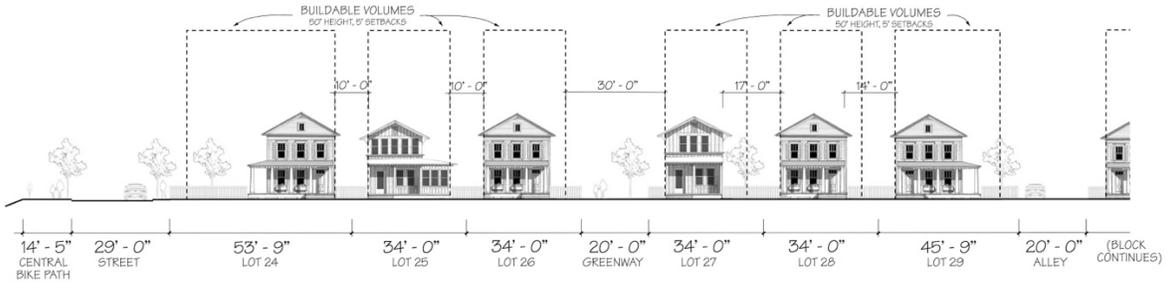
**ASHLAND MILL**  
**PRELIMINARY ELECTRICAL SERVICE PLAN**  
**11/14/2025**



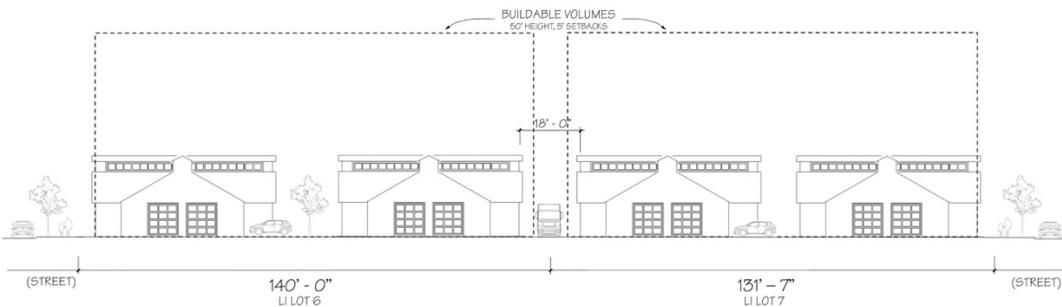
MULTI-FAMILY  
 PROTOTYPICAL STREET (SILK TASSEL LANE)



SINGLE-FAMILY ATTACHED  
 PROTOTYPICAL STREET (SIBERIAN ELM STREET)



SINGLE-FAMILY DETACHED  
 PROTOTYPICAL STREET (SIBERIAN ELM STREET)



LIGHT INDUSTRIAL  
 PROTOTYPICAL BLOCK (MISTLETOE ROAD)

ASHLAND MILL  
 PROTOTYPICAL ELEVATIONS AND BUILDING VOLUMES

NOTE: TO BE REFINED PRIOR TO FINAL SITE PLAN REVIEW

NOT TO SCALE

### **3.10 Prototypical Elevations and Building Volumes**

The drawing on the previous page shows prototypical conditions for multi-family, single-family attached, single-family detached, and light industrial building types. These are placed on actual lots within the preliminary plat (see lot numbers for reference). The team notes that plans will be refined prior to final site plan review, and as users are recruited and configurations are finalized. However, these prototypical elevations and building volumes demonstrate what the proposed code will allow (together with fire code and other governing regulations). They also illustrate the character proposed by the Applicant for the overall development: a walkable, human-scale, mixed-use development providing much-needed housing, jobs, and other amenities for Ashland residents.



Google

## 4. Proposed Alternate Standards

---

### 4.1 Summary

The proposed master plan includes several notable deviations from city-wide standards that are included in the proposed development agreement, or in the proposed zoning code amendment, as follows:

### 4.2 Street Medians in Private Ownership

The Applicant and the City have tentatively agreed that medians as shown on the master plan will not become City rights-of-way, but will remain as private tracts under the future Property Owners' Association (POA). Responsibility for landscaping, irrigation and maintenance of these tracts will remain with the POA.

### 4.3 Laneway-Greenway Configuration

The Applicant and the City agree that some homes will not face on to public streets, but will instead face onto private POA tracts or "greenways", serviced at the rear on alleys or drive aisles, which will provide addressing (with naming to be established by the City) as well as emergency response access.

### 4.4 Pervious Parking Areas

Consistent with the goals of promoting ecological and low-impact development strategies, improving water quality, and mitigating urban heat island effects, the Applicant is proposing a design where drive aisles are paved asphalt but parking stalls are a stabilized gravel surface. The standard is as follows:

#### *18.3.2.060 Site and Development Design Standards*

#### *B. Site and Building Design Standards*

*4.c. Parking stalls within the R-MU and CIC-MU subzones may use a stabilized, tackifier-bound gravel system meeting ADA accessibility requirements and preventing gravel migration into stormwater systems. The gravel will consist of angular crushed granite compacted to 95% Proctor, sealed with an environmentally safe polymer binder, and contained with edge restraints. This system provides a stable, firm surface, reduces impervious surface area, and aligns with the ecological, low-impact development goals of the City of Ashland.*



## 5. Draft Findings of Fact

---

The following section includes the draft findings of fact that, upon approval and/or refinement, will become the basis for the entitlement. They are grouped into the findings for the Type III Legislative Application, and those for the Type II Planning Application.

### 5.1 Type III Legislative Application

**Proposal Summary:** Townmakers LLC (the Applicant) proposes a Legislative Amendment to Ashland Municipal Code (AMC) Chapter 18.3.2 (Croman Mill District). The amendment will create two new zoning sub-districts within the Croman Mill District, specifically for the Ashland Mill site: “**Residential – Mixed Use (R-MU)**” and “**Compatible Industrial and Commercial – Mixed Use (CIC-MU)**” – and will adjust the Croman Mill District Plan accordingly. These new subzones will allow a greater mix of land uses (including housing in areas previously reserved for employment) while preserving key employment land, open space, and transportation networks. The goal is to facilitate a **walkable, compact, mixed-use, and ecologically sustainable** development pattern on the 61-acre former mill site, consistent with Ashland’s Comprehensive Plan and the purpose of the Croman Mill District. The following findings demonstrate the proposal’s conformance with **AMC 18.3.2**, city-wide planning policies, and all applicable approval criteria for a Type III legislative land use action.

#### 5.1.1 Conformance with AMC 18.3.2

##### (Croman Mill District Standards & Intent)

**Criterion (AMC 18.3.2.010 – District Purpose):** *“The purpose of this section is to implement the Croman Mill Site Redevelopment Plan. The district is designed to provide an environment suitable for employment, recreation, and living...”. Key objectives of the Croman Mill District Plan include: preservation of employment lands; buffering of adjacent neighborhoods; mitigating traffic on Tolman Creek Road; preservation of creeks, ponds, and wetlands; a central open-space element; a street network for truck, transit, pedestrian, and bicycle access; and creating a unique district identity.*

**Response:** The proposed creation of the R-MU and CIC-MU subzones **upholds the original purpose and objectives** of the Croman Mill District. The new zoning is crafted to maintain an environment for employment as well as living/recreation, as envisioned

by the 2010 Croman Mill Redevelopment Plan, but adjusted to current needs and market demands. In particular:

- **Preservation of Employment Land:** The CIC-MU zone is designed to retain a strong employment focus (light industrial, office, and commercial uses), thereby preserving Ashland’s supply of job-producing land as originally intended. A baseline acreage for employment uses will be established in the development agreement to ensure that a minimum area is dedicated to job-generating activities in each phase. The addition of a compatible mix of commercial uses will allow the plan to adapt to market needs while still prioritizing family-wage jobs and new locally-owned businesses on site. This approach continues to fulfill the Croman plan’s employment land preservation objective, **consistent with the district’s purpose of providing employment-generating land uses.**
- **Introduction of Mixed-Use Housing:** The R-MU subzone will allow much-needed housing (up to 550 homes are proposed) in a compact, walkable mixed-use neighborhood setting. Importantly, this housing is integrated without removing the dedicated employment lands; instead, it is distributed in areas where residential use was not previously envisioned but is now appropriate to create a vibrant live-work community. By redistributing some housing capacity to the R-MU zone, the amendment responds to current housing needs while still implementing the core elements of the Croman plan. The district will thus provide places to live as well as work and recreate, in line with the plan’s mixed-use intent. The addition of housing also helps Ashland meet state mandates (in particular, Statewide Planning Goal 10) to accommodate needed housing within the urban growth boundary in a climate-friendly, compact form.
- **Walkable, Compact Development Pattern:** Both new subzones are formulated to create a coherent, compact urban extension of Ashland. The plan emphasizes human-scale design, including buildings oriented to streets (“active edges”) and a fine-grained block network to foster walkability. The **street and pathway layout** from the original district plan is retained in its essential concept, ensuring a connected network for pedestrians and cyclists. A central boulevard and multi-use paths link the new neighborhood internally and to the broader city, supporting the objective of incorporating transit, pedestrian, and bicycle access throughout the district. The subzones’ standards will require sidewalks, street trees, and pedestrian-friendly frontages, thereby creating the “coherent, walkable public realm” that the project’s code amendment seeks to specify. In sum, the amendment facilitates a **walkable mixed-use district** where homes, jobs, parks, and small-scale

services are within easy walking distance of each other, directly aligning with the Croman plan's vision of a unique, pedestrian-oriented district.

- **Open Space and Environmental Protection:** The Croman Mill Plan's environmental and open space objectives are fully sustained. The proposed zoning map retains the **Open Space/Conservation (CM-OS)** areas for Hamilton Creek, wetlands, and the central green space. No changes are proposed to the CM-OS protections; thus, all creeks, ponds, and wetland areas will remain preserved as undeveloped open space in the new plan. In fact, the introduction of residential uses increases the imperative to provide parks and trails as amenities: the development concept includes multiple parks, trails, and a "central open-space element" that will serve the neighborhood and city. By cleaning up this long-vacant brownfield site and dedicating natural areas to the public, the proposal exhibits **environmental sensitivity** and furthers the plan's conservation goals. The Department of Environmental Quality (DEQ) remediation of contaminated soils (old burn sites and treated wood areas) is currently underway, and the redevelopment will complete this cleanup, turning a blighted area generating truck traffic and noise into a healthy environment and community asset. This outcome is in harmony with the district's purpose of providing an environment suitable for recreation and living, not just employment.
- **Neighborhood Buffering and Traffic Mitigation:** The new subzones are mapped and designed to maintain appropriate transitions to surrounding areas. The **west edge** of the Croman site abuts existing neighborhoods; here, land uses and development intensity will be controlled to buffer those neighbors (for example, lower building heights are required adjacent to the residential edge, similar to how the original plan's Neighborhood Center provided a transition). The proposal does not alter the previously planned street connections to Tolman Creek Road and Siskiyou Boulevard; instead, it refines them. A new central "signature boulevard" through the site will handle the majority of traffic, deliberately **keeping heavy traffic off Tolman Creek Road** to mitigate impacts on the existing neighborhood and school. By adhering to the planned transportation improvements and distributing traffic internally on new streets, the amendment continues to address the objective of minimizing potential traffic impacts on adjacent streets. Additionally, the mix of uses and on-site services in the new plan will internally capture many trips (people can walk or bike to work or a neighborhood market), further reducing external traffic generation in line with the plan's intent.

- **Unique District Identity:** The creation of the R-MU and CIC-MU zones will allow Ashland Mill to evolve as a **distinct urban neighborhood** that complements, rather than duplicates, downtown Ashland. The permitted use lists and design standards for these subzones are being tailored to encourage uses that serve local needs and incubate innovative businesses, without directly competing with downtown’s role. For example, large-format retail or auto-centric uses remain restricted, while “makerspace” industrial studios, live-work units, small-scale shops and cafes, and community facilities will be encouraged in the mix. The physical design, with buildings brought up to the street, active public spaces, and integration of public art and green infrastructure, will create a strong sense of place building on and reinforcing Ashland’s best qualities. In essence, the legislative amendment refines the zoning toolkit to realize an **“urban extension” of Ashland that builds on the city’s livability and natural beauty**, as the project goals articulate. This is entirely consistent with the Croman District Plan’s aim to establish a unique, visible district identity to attract investment and community use.

**Criterion (AMC 18.3.2 – General Standards):** *Any amendments to the Croman Mill District zoning or plan must continue to meet the general requirements and development standards of the district (e.g. land use mix, street layout, building design standards, residential densities, etc.), or else be justified as major amendments per the code.*

**Response:** The proposed code amendment has been crafted in coordination with City staff to **integrate into the existing Croman Mill District standards** seamlessly. The new subzone regulations will be added to AMC 18.3.2 and the Croman Mill District Plan maps (land use overlay, circulation, open space, etc.) updated accordingly, but no existing standard is being deleted or ignored. Rather, the amendment builds on the established plan framework, making only those alterations warranted by changing needs and market demands:

- The **land use matrix** for the Croman Mill District (AMC 18.3.2.040) is being expanded to include the R-MU and CIC-MU zones, with allowed uses that reflect a blend of the original zones’ intentions. This retains a clear emphasis on employment uses in CIC-MU (light manufacturing, offices, corporate campus, etc., similar to CM-CI and CM-OE zones) while adding limited (above-ground) residential and retail permissions to support a live-work environment. In R-MU, residential uses (including multifamily and cottages) will be permitted alongside small-scale commercial uses (shops, services, live-work units) to create a true mixed-use neighborhood. All uses proposed are consistent with or narrower than

those contemplated in the 2010 Plan. For example, no heavy industrial or large big-box retail can be allowed or accommodated, in keeping with the plan's focus on jobs and avoiding competition with downtown. Thus, the balance of land uses envisioned by the original plan is maintained, with the **flexibility** to respond to market demands that the new zones provide.

- The **street network and block layout** established in the Croman Plan are largely retained. The amendment will carry forward the mapped street alignments (including the central boulevard, neighborhood streets, multi-use path corridors, and transit plaza location) with only minor refinements to improve connectivity and better respond to the new land use pattern. These adjustments (e.g. slight relocation of a planned street or path) will not affect other property owners outside the Townmakers site, aside from coordinating connections to the broader network. The fundamental transportation elements – a multi-modal grid that slows traffic, provides **transit access**, and prioritizes pedestrians and cyclists – remain intact, meeting the district's street design requirements. All new streets will be built to City of Ashland standards or the specific cross-sections in the Croman design standards (such as the "Signature Boulevard" cross-section described in the plan).
- The **site and building design standards** of the Croman District (AMC 18.3.2.050 and the associated Site Design & Use Standards chapter) will continue to apply, with appropriate additions and revisions for the new subzones. The proposal seeks only limited and justified **exceptions and variances** to dimensional standards, building height limits, open space requirements, parking standards, and other development regulations. Beyond these limited changes, as detailed in the proposed AMC 18.3.2 code amendments, all development will conform to the previously adopted standards. For example, build-to lines along designated active edges will still be required, ensuring an urban street character; parking lots will still be placed behind or beside buildings; and architectural guidelines (e.g. articulated facades, awnings, etc.) will be met by new buildings under the relevant codes. The new zones will include residential density standards appropriate for multifamily housing, but those densities will be within the range already contemplated in the plan (the original Neighborhood Center zone allowed up to 60 du/acre in mixed-use buildings). In sum, the **form-based standards** that make the Croman plan a compact, pedestrian-friendly design will govern the new development as well – thereby ensuring the amendment does not compromise the district's quality or intent.

- The amendment follows the **major amendment procedures** anticipated in the Croman District code. As noted by staff, redistributing housing and adjusting the land-use overlays in the district is considered a “major amendment” to the plan, requiring legislative approval by the City, requiring Planning Commission recommendation and City Council adoption. This application is proceeding accordingly through the Type III process, including all required public hearings and agency notifications. In doing so, the proposal is meeting the procedural requirements of AMC 18.3.2 and 18.5.9 for legislative changes. The findings herein demonstrate that the changes are consistent with the **intent and spirit** of the Croman Mill District Plan, and thus the proposal merits approval.

### 5.1.2 Conformance with City of Ashland Comprehensive Plan and Policies

**Criterion (AMC 18.5.9.020.B – Legislative Amendment Criteria):** For a Type III legislative land use action (including ordinance and zoning map amendment), the City must find the proposal is consistent with the Ashland Comprehensive Plan and other adopted City policies.

**Response:** The proposed Croman Mill District amendments are **consistent with and further multiple goals and policies of the Ashland Comprehensive Plan**, as detailed below. The creation of a walkable mixed-use employment center with integrated housing on a cleaned brownfield site aligns strongly with the City’s long-range plans for land use, housing, economic development, transportation, and environmental quality. Key Comprehensive Plan directives advanced by this proposal include:

- **Compact Urban Form & Multi-Modal Transportation:** *Goal/Policy – “Maintain and improve Ashland’s compact urban form to allow maximum pedestrian and bicycle travel. Promote a mixed land use pattern, where appropriate, and pedestrian environment design that supports walking and bicycling trips.” (City of Ashland Comprehensive Plan, Section 10.04.12.)*

The Croman Mill redevelopment clearly exemplifies these policies. By introducing a compact mix of uses (housing, jobs, services) within the city rather than on the outskirts, the plan **concentrates growth within an existing urban area**. The site design emphasizes short block lengths, extensive bike/pedestrian pathways, and a transit plaza, all to encourage walking, cycling, and future transit use instead of car trips. Residents and workers will be able to meet many daily needs on site or reach them via alternative transportation, directly supporting the Comprehensive Plan’s call for a land use pattern that facilitates non-automobile travel. The

compact, infill development of Croman Mill also helps maintain Ashland’s urban growth boundary by efficiently using land inside the city for needed housing and employment (this supports Comprehensive Plan Goal 12.09 to maintain a compact urban form and avoid sprawl). Overall, the proposal’s walkable design and mixed-use layout are **in full harmony with Ashland’s policies on sustainable, multi-modal, infill development.**

- **Mixed-Use and Transit-Oriented Development:** *Policy – Encourage the concentration of housing and businesses within 1/4 to 1/2 mile of transit routes and in mixed-use developments, to reduce vehicle miles traveled and support transit service. (Implied in Transportation and Land Use Elements and consistent with Oregon’s Transportation Planning Rule and CFEC requirements.)*

The Croman Mill site is planned as a **transit-ready district**. The project includes a dedicated transit stop (transit plaza) centrally located in the neighborhood center, and the street network is designed to accommodate efficient transit circulation. By providing a dense mix of housing and jobs in one area, the project will create a node of transit demand that can support improved Rogue Valley Transportation District (RVTD) bus service over time. This directly addresses state and local policies aimed at reducing reliance on single-occupancy vehicles. Ashland’s Transportation System Plan and Comprehensive Plan encourage development in “Transit Potential Areas,” and this site will achieve exactly that by fulfilling the notion of a transit-oriented, mixed-use district. In addition, by integrating affordable and workforce housing on site (at least 10 units in each phase will be affordable at 80% AMI per the developer’s commitments), the plan ensures that people of varying incomes can live near jobs and transit – a key sustainability and equity goal of the City’s **Climate Energy Action Plan and Comprehensive Plan Housing Element**. Thus, the legislative amendment enabling this transit-supportive, mixed-use community is consistent with Ashland’s adopted transportation and land use policies that favor compact, transit-served growth.

- **Housing Needs and Affordability:** *Goal: Provide a variety of housing types for a range of incomes; encourage affordable and workforce housing development, especially in infill locations that reduce transportation costs for residents. Policy: Encourage mixed-use developments that include housing in commercial/employment zones where appropriate.*

The Croman Mill amendment furthers these housing objectives by opening up a large new area for residential development inside the city limits. Ashland’s Housing Needs Analysis notes the City’s commitment to **compact urban**

**residential development coupled with multimodal transport options to improve overall affordability** (reducing combined housing and transportation costs). The R-MU zone will deliver up to 550 new homes in a mix of formats (apartments, townhouses, cottages, and live-work units), addressing a significant portion of the City’s identified need for middle-income and rental housing. Because this housing is in a mixed-use neighborhood, residents can walk or bike to employment on-site or nearby, which will reduce commuting costs and vehicle expenses – effectively making living in Ashland more affordable, as the Comp Plan advocates. At least 10 units per phase are expected to be designated affordable (calibrated to households at 80% of median income), consistent with the City’s affordability incentives and policies. Furthermore, by integrating housing into an employment center, the amendment aligns with recent City policy direction to allow housing in employment zones (as seen in other Ashland initiatives to mix housing with commercial zones). In summary, the proposal is **consistent with Ashland’s housing policies** by providing needed housing types, including affordable units, in an infill location that promotes cost savings and quality of life for residents.

- **Economic Development and Employment:** *Goal: Encourage economic development that diversifies the tax base and provides family-wage jobs, while preserving an adequate supply of employment land (industrial and commercial) for future needs. Policy: Protect industrial lands from conversion unless a proposed mix of uses still meets long-term employment needs (as guided by the Economic Opportunities Analysis).*

The Croman Mill District has long been identified as a future employment center for Ashland, and the proposed amendments continue to fulfill that role in a more flexible form. The CIC-MU zone ensures that the majority of the site (by land area) will remain dedicated to employment-generating uses – the code amendments will actually **establish minimum employment land areas** per phase to guarantee job capacity is delivered in step with housing. By allowing a modest amount of housing and retail to co-locate with workplaces, the plan makes the employment lands more attractive to modern employers (who value walkable, amenity-rich districts) and thus improves the City’s ability to attract new businesses and talent. This mixed-use approach is supported by economic development best practices and is consistent with Ashland’s Comprehensive Plan, which does not call for single-use business parks, but rather encourages **“live-work-play” environments** that can help recruit companies beyond the tourism sector. Importantly, the amendment does not remove the site from the City’s employment land inventory – on the contrary, it facilitates infrastructure and private investment that will bring

these long-vacant industrial parcels into productive employment use (office, light manufacturing, tech, and “makerspace” enterprises) much sooner than if left under the old plan. Croman’s redevelopment will contribute to meeting the need for employment and jobs creation by providing space for an estimated **400–800 jobs on site** (based on a range of employment densities, from light industrial to office uses). This supports Comprehensive Plan goals for expanding local job opportunities and reducing commuting. In sum, the legislative change strikes a careful balance between **adding housing** and **preserving employment capacity**, thereby aligning with City economic policies and Statewide Planning Goal 9 (Economy) which require maintaining sufficient industrial/commercial lands for economic growth.

- **Environmental and Sustainability Policies:** *Goal: Develop Ashland in an environmentally responsible manner, protecting natural resources (creeks, wetlands, air quality) and encouraging sustainable design and energy efficiency. Policy: Encourage redevelopment of brownfields with appropriate remediation; incorporate green infrastructure in site development; increase tree canopy and open space in new developments.*

The Ashland Mill proposal is a model of sustainable, environmentally-sensitive redevelopment. It takes a 70-acre brownfield (a former lumber mill with contaminated soil and decades of debris) and **restores it to productive use following comprehensive environmental cleanup**. This directly advances policies related to pollution remediation and land recycling. The project will implement DEQ-approved cleanup plans to remove dioxins and other contaminants, resulting in improved soil, water, and habitat quality on and around the site – a benefit to the community and environment that is consistent with Ashland’s commitment to environmental health. Additionally, the new code provisions and design standards for the district emphasize green development practices: for example, on-site stormwater will be managed with **bioswales, rain gardens, and water infiltration systems** integrated into parking areas and open spaces, reducing runoff and protecting water quality. The landscape standards will require extensive **tree planting and preservation**, in line with the City’s goal to increase tree canopy coverage (e.g. Comprehensive Plan Goal 8.16.19 which calls for more tree canopy over parking lots). Building construction is expected to meet high energy efficiency standards (the developer has indicated many structures will pursue green building certifications such as LEED or Passive House), which aligns with Ashland’s Climate and Energy Action goals. By creating a compact, mixed-

use district, the project also helps reduce per-capita vehicle emissions (less driving) and supports **Climate-Friendly Communities** objectives at the state level (even though the neighborhood is not a designated climate—friendly area). Finally, large portions of the site are set aside as natural open space, parks, pedestrian greenways and plazas (approximately 18%). These areas will protect wetlands and creek corridors, provide habitat, and offer recreation for residents, all consistent with Comprehensive Plan policies on open space preservation and park provision. In total, the legislative amendment enabling this project is **consistent with Ashland’s environmental policies**, as it facilitates a development that improves environmental conditions, avoids ecological impacts, and promotes sustainability.

- **Public Facilities and Services:** *Goal: Ensure that new development is served with adequate public utilities and infrastructure concurrent with growth.*

The Comprehensive Plan and Public Facilities Plan call for new urban development to pay its way with necessary extensions of water, sewer, storm drainage, streets, and other services. In this case, the Croman Mill code amendment is paired with a development agreement (and site plan and Phase One subdivision plan) that will provide **full urban infrastructure to the site**. The proposal has been reviewed in concept by City Public Works and Engineering, and all services (water, sewer, electricity, transportation) either have adequate capacity or will be upgraded as part of the project. For example, a new sanitary sewer line is planned to connect the site to the existing city sewer system, sized per Public Works standards; the water system will be looped through the site, improving fire flow and redundancy for the area; and stormwater facilities will be designed in compliance with City standards to handle a 25-year storm without burdening downstream systems. Street improvements (curbs, sidewalks, pavement) will be built to City specs and dedicated as public rights-of-way. Consistent with Ashland’s policies, the project will also likely annex the remaining 6-acre portion of the site so that all development is within City limits and subject to City utility provision. In summary, the amendments will not outpace the City’s ability to serve the area. Rather, they set the stage for an **orderly extension of urban services** to a key redevelopment area, aligning with Comprehensive Plan provisions on public facilities and the efficient use of existing networks.

Based on the analyses above, the proposed legislative amendments **conform to the Ashland Comprehensive Plan** in all relevant aspects. The creation of walkable R-MU and CIC-MU zones in the Croman District will implement long-standing City goals for compact, mixed-use, transit-supportive, and sustainable growth. The project balances

housing and employment needs, protects natural features, and provides needed infrastructure, fulfilling the letter and spirit of multiple City policies (Land Use, Transportation, Housing, Economic, Environmental, Public Facilities, etc.). Therefore, the criteria of AMC 18.5.9.020.B are satisfied.

**Criterion (Consistency with Statewide Planning Goals):** As a legislative land use amendment, the proposal must also be consistent with the Oregon Statewide Planning Goals and applicable administrative rules.

**Response:** The amendment is **consistent with the Statewide Planning Goals**, including the following key goal findings:

- **Goal 1 (Citizen Involvement):** The City has conducted and will continue to conduct extensive public outreach for the Croman Mill plan updates beginning in 2021, including public open houses, study sessions, and the required hearings for this amendment. This meets Goal 1 requirements for a citizen involvement process.
- **Goal 2 (Land Use Planning):** The proposal is the product of coordinated, comprehensive planning and is supported by detailed findings (this document) providing an adequate factual basis. It thus complies with Goal 2's directive for a well-supported land use decision-making process.
- **Goal 9 (Economic Development):** As noted, the amendment ensures adequate employment lands are provided and improves the viability of the site for job creation, consistent with the City's Economic Opportunities Analysis and Goal 9. There is no loss of industrial land without an equivalent or greater benefit in mixed-use employment capacity.
- **Goal 10 (Housing):** The amendment significantly advances Goal 10 by enabling the development of up to 550 new housing units within the UGB, across various affordability levels. This will help Ashland meet its identified critical housing needs for the planning period.
- **Goal 11 (Public Facilities) and Goal 12 (Transportation):** Public facilities and transportation have been addressed and found to be adequate (or improved) for the project. A Traffic Impact Analysis has been conducted for the site to ensure transportation planning rule compliance (appended to this report). The mixed-use design inherently supports Goal 12 by reducing reliance on automobiles and encouraging alternative transportation (walking, biking, transit).

- **Goal 13 (Energy Conservation):** The compact, energy-efficient land use pattern will help conserve energy (less driving, more efficient buildings), consistent with Goal 13. The smaller and more compact home formats will also promote energy conservation.

No Goal exceptions are required, and the proposal does not impact Goals 3–8 or 14 (the UGB is not being expanded; the site is an urban infill). Therefore, the amendment upholds all applicable Statewide Planning Goals.

**Conclusion (Type III Legislative Approval Criteria):** The proposed Croman Mill District legislative amendments creating the R-MU and CIC-MU subzones have been found to **conform with the intent of AMC 18.3.2, to be consistent with the Ashland Comprehensive Plan’s goals and policies, and to satisfy the relevant Statewide Planning Goals.** The amendment is necessary to respond to changed circumstances (the need for a flexible, mixed-use approach to spur redevelopment of the long-vacant mill site) and will further the public interest by facilitating a model sustainable development. All applicable approval criteria for a Type III legislative land use action have been met or exceeded.

Based on the foregoing findings of fact and conclusions, the Planning Commission and City Council can **approve the proposed ordinance amendments** to implement the new Croman Mill District subzones, confident that the action is supported by and consistent with adopted plans and regulations.

## 5.2 Type II Planning Application

**Proposal Summary:** The Applicant requests **Type II Outline Plan Subdivision Approval** for the redevelopment of the former Croman Mill site in Ashland. The Outline Plan addresses the **full 70-acre site** in three phases – Residential, Commercial (Neighborhood Center/Mixed-Use), and Light Industrial – pursuant to the Croman Mill District Plan. Concurrently, **preliminary plat approval for Phase One** is requested, which will plat the initial development phase while leaving remaining land as large tracts for future phase subdivision. The Outline Plan will govern **full build-out of infrastructure and development** for all phases, ensuring a coordinated, walkable, mixed-use neighborhood consistent with City plans. **No variances or exceptions** to Ashland standards (e.g. street design or zoning requirements) are requested; the plan complies outright with all applicable Land Use Ordinance provisions.

**Phasing and Full Build-Out:** The Outline Plan establishes the framework for streets, utilities, open spaces, land use distribution, and site design elements across all three phases. Phase One will be platted and developed now, including construction of key infrastructure sized for the entire project. Subsequent phases (Two and Three) will require Final Plan and plat approvals in the future, and must **conform substantially to this approved Outline Plan** (per AMC 18.3.9) to ensure continuity. Phase One’s plat will create the necessary residential lots and dedicate any new public streets and open space tracts for that phase, while **large remainder tracts** will be designated for the Phase Two commercial/mixed-use area and Phase Three industrial area. This approach guarantees that **the Outline Plan remains in force over the whole site** until build-out, and that each phase is integrated into a cohesive, transit-ready and ecologically responsive neighborhood.

### 5.2.1 Compliance with Approval Criteria (AMC 18.5.3.050)

The Ashland Municipal Code (AMC) establishes criteria for preliminary subdivision (Outline Plan) approval in AMC 18.5.3.050. Each criterion and the project’s compliance are detailed below:

- **Criterion (AMC 18.5.3.050.A):** *“The future use for urban purposes of the remainder of the tract will not be impeded.”*

**Finding: Satisfied.** The proposed Outline Plan encompasses the **entire Croman Mill property**, so no portion of the parent tract is left unplanned or unusable. All land is slated for urban development under the Croman Mill District zoning, in three coordinated phases. Even though Phase One plats only part of the site, the **remainder of the tract is reserved for Phases Two and Three** per the Outline Plan, with appropriate infrastructure stubs and service plans in place to serve those future phases. By creating large remainder tracts for later development (rather than fragmenting or land-locking them), the plan ensures the remainder of the site can and will be developed to full urban potential. Thus, the subdivision does not preclude or impede the future urban use of any part of the property, in accordance with AMC 18.5.3.050(A).

- **Criterion (AMC 18.5.3.050.B):** *“The development of the remainder of any adjoining land or access thereto will not be impeded.”*

**Finding: Satisfied.** The proposed subdivision and street layout are designed to integrate with and not hinder development of adjacent lands. The Croman Mill

site is bounded largely by existing rights-of-way (Siskiyou Boulevard, Tolman Creek Road, Mistletoe Road) and other barriers (Interstate 5 and the railroad). **No adjoining undeveloped parcels will be cut off** by this plan. Where adjacent properties do exist (e.g. established neighborhoods west of Mistletoe Rd), the plan provides appropriate connections and buffers rather than barriers. The **new internal street network** will tie into the existing street system at multiple points, including extending **Mistletoe Road through the site to connect to Siskiyou Blvd**, as called for by the Croman Mill District plan. This allows logical access for future development on surrounding lands. Additionally, street stubs or multimodal path connections can be provided to any property edges where future links are feasible. By ensuring **connectivity and logical extensions of infrastructure**, the Outline Plan avoids impeding access to or development of any neighboring lands, satisfying AMC 18.5.3.050(B).

- **Criterion (AMC 18.5.3.050.C):** *“The [subdivision] plan conforms to applicable City-adopted neighborhood or district plans, if any, and any previous land use approvals for the subject area.”*

**Finding: Satisfied.** The proposal is in full compliance with the **Croman Mill District Plan (2010)**, which is the City-adopted plan guiding redevelopment of this site. The Outline Plan has been designed around the key objectives of that District Plan and its implementing standards. Notably: **(a)** The project preserves and provides **employment lands** (light industrial and office/employment areas in Phase Three and part of Phase Two), fulfilling the District Plan goal of maintaining economic development opportunities on this former employment site. **(b)** The plan **buffers the residential neighborhood to the west** by locating lower-intensity residential uses and open spaces along the western edge of the site, transitioning from existing homes to the more intensive commercial/industrial uses toward the east. This addresses the District Plan objective of protecting the adjacent neighborhood. **(c)** The street network and access points are configured to **mitigate traffic impacts on Tolman Creek Road**, as directed by the District Plan. The primary vehicular circulation through the site will be via the extended Mistletoe Road connecting to Ashland Street (Siskiyou Blvd), creating a new route that relieves pressure on Tolman Creek Road. Intersection improvements and multimodal enhancements will further manage traffic flow so that the existing neighborhood streets are not overburdened. **(d)** The plan provides for **preservation of natural areas** on site – any existing creek corridors, ponds or wetlands are set aside as open space tracts. In fact, a **central open space feature** is

a centerpiece of the design (e.g. a park or green commons, potentially incorporating a pond or restored wetland), consistent with the District Plan's call for a central open-space element and natural area preservation. **(e)** The Outline Plan creates a **walkable, transit-supportive street network** with complete streets for trucks, transit, pedestrians and bicyclists, directly echoing the District Plan's multimodal access objective. Sidewalks, bike lanes (or paths), transit stop accommodations, and a connected block structure are provided to ensure a compact, walkable neighborhood form. **(f)** The mixed-use, **compact "live-work-play" development pattern** proposed will help establish a unique district identity for the Croman site, as envisioned in the plan. In summary, the Outline Plan has been crafted in harmony with the Croman Mill District Plan, implementing its land-use designations, street alignments (such as the Mistletoe Road extension), density provisions, and design standards (green development, open space, etc.). There are **no prior land use approvals** for this property that remain in effect (the site was largely vacant industrial land); thus no conflicts arise. The proposal's consistency with the City's adopted district plan and policies demonstrates compliance with AMC 18.5.3.050(C).

- **Criterion (AMC 18.5.3.050.D):** *"The tract of land has not been partitioned for 12 months."*

**Finding: Satisfied.** The Croman Mill tract has **not been partitioned or subdivided within the past 12 months** (or indeed in the past several decades). The last land division affecting this property occurred well over a year ago, if at all (historically the site remained as one large tract under industrial ownership). Therefore, the application meets the timing criterion in AMC 18.5.3.050(D). There is no recent serial partitioning of the land that would violate this standard.

- **Criterion (AMC 18.5.3.050.E):** *"Proposed lots conform to the requirements of the underlying zone, per part 18.2, any applicable overlay zone requirements, per part 18.3, and any applicable development standards, per part 18.4 (e.g., parking and access, tree preservation, solar access and orientation)."*

**Finding: Satisfied.** The subdivision design fully complies with the dimensional and development standards of the **Croman Mill District zoning** and all overlay regulations. The site is zoned under multiple Croman Mill District designations – including Compatible Industrial (CM-CI), Mixed Use (CM-MU), Neighborhood Center (CM-NC), Office Employment (CM-OE), and Open Space (CM-OS) – as

identified in the District zoning map. The Outline Plan and plat ensure that each **new lot corresponds to an allowed use and meets the lot standards** of its respective zone. For example, the **Phase One lots (residential)** are located in the CM-MU/NC areas where residential use is permitted, and the lot sizes and configurations are consistent with those zones' standards (building envelopes will comply with height, coverage, and setback requirements set forth in the Croman District standards). The **future Phase Two and Three tracts** are sized and zoned appropriately for their intended commercial and industrial uses, with no lot exceeding or subverting the allowable use or density of its zone. Overall residential unit count (approximately 500 homes on 62–70 acres) does not exceed the maximum density contemplated for the CM District; in fact, the mix of multifamily and small-lot units proposed will utilize the allowable density efficiently while staying within limits set by the zoning ordinance and the Climate-Friendly Area designation for this site. All applicable **overlay requirements** are addressed: for instance, if any portion of the site lies in the City's Wildfire Hazard Area overlay, the development will comply with wildfire safety standards (fuel reduction, FireWise landscaping, etc., per AMC 18.3.10); if Water Resource Protection zones apply (e.g. near any creek or wetland), those areas are being placed in open space tracts and will be protected consistent with AMC 18.3.11. Notably, **the plan identifies an Open Space zone** along the site's natural features – these areas will be **dedicated as common open space/park land**, as required by AMC 18.3.2.070. In doing so, the project meets the Croman District mandate that any land mapped for open space be set aside for parks or conservation. Additionally, all **general development standards** in AMC 18.4 are met or exceeded. **Parking:** Adequate parking areas are provided for each use in accordance with AMC 18.4.3, while also balancing multimodal goals (the plan contemplates shared parking and demand management to encourage transit and biking). **Access:** The access design for each lot complies with AMC 18.4.3.080 – no new lot will have direct driveway access to the arterial street (Ashland St), instead accessing from internal streets; driveway spacing and widths will conform to standards. **Tree Preservation:** A certified arborist has surveyed the site and a Tree Preservation & Protection Plan per AMC 18.4.5 is included. Significant trees (especially along the creek corridor and perimeter) are preserved to the extent feasible, and any removals (mostly invasive or hazard trees, as the site was largely cleared from past industrial use) will be mitigated with new landscaping. **Solar Access:** The subdivision is designed to allow future buildings to meet Solar Setback Standard A (AMC 18.4.8). The lots are oriented and of sufficient size such that a standard home can be placed without casting excessive shadow on the lot

to the north. There are no north-south lot dimension issues that would preclude meeting the City's solar setback requirements (per calculations, each lot can accommodate a 21-foot tall structure with a solar setback not exceeding 50% of the lot's north-south dimension, consistent with AMC 18.4.8.040). **Public Facilities:** All lots will be served by city utilities (water, sewer, electric, and storm drain) installed in accordance with AMC 18.4.6 – see findings under criterion (G) below for details. In summary, the subdivision's lot layout and design fully comply with underlying zone standards, overlays, and development standards, with **no exceptions or variances needed**. This criterion is met.

- **Criterion (AMC 18.5.3.050.F):** *“Accesses to individual lots conform to the standards in section 18.4.3.080 Vehicle Area Design.”*

**Finding: Satisfied.** The proposed access plan conforms to all City standards for driveway design, emergency access, and connectivity. **No flag lots** are proposed (all lots will have standard public street frontage), so the specific flag lot access standards of AMC 18.5.3.060 do not apply. Instead, each lot in Phase One will gain vehicular access via the **new public streets** within the subdivision, which are designed to City street standards (with sidewalks, planter strips, etc.) rather than individual driveways on existing major streets. This approach inherently meets AMC 18.4.3.080 requirements by minimizing direct driveway connections to collectors/arterials and providing safe, shared access. For instance, **no new driveways will connect directly to Siskiyou Boulevard or Tolman Creek Road;** all lot access is internal, preventing traffic conflicts on the main roads. The spacing between intersections and driveways meets the minimum separation requirements (24-foot minimum separation, etc.), and vision clearance triangles at corners will be maintained per AMC 18.4.3.090. In commercial and industrial areas, joint access and cross-access easements will be employed as needed to further reduce curb cuts, consistent with the Transportation Element's policies for access management. Additionally, the street layout includes consideration for emergency vehicle access – multiple access points and looped street connections ensure that fire apparatus can reach all lots (meeting Ashland Fire Code and Public Works standards for turnarounds, etc.). Overall, by using public streets for lot access and adhering to the design standards (width, grade, curb cuts) in AMC 18.4.3.080, the application satisfies the access criteria. The **Planning Commission will not need to impose any Variance for driveway standards**, as none is needed – all access dimensions and configurations are standard and acceptable.

- **Criterion (AMC 18.5.3.050.G):** *“The proposed streets, utilities, and surface water drainage facilities conform to the street design standards and other requirements in part 18.4, and allow for transitions to existing and potential future development on adjacent lands.”* **“The preliminary plat shall identify all proposed public improvements and dedications.”**

**Finding: Satisfied.** The Outline Plan includes a comprehensive **infrastructure plan** for streets, utilities, and storm drainage that meets City of Ashland engineering design standards (AMC 18.4) and will fully serve the development’s needs at build-out. **Street Design & Connectivity:** All new streets are designed to Ashland’s street standards (AMC 18.4.6.040) for right-of-way width, travel lanes, sidewalks, parkrows, and bikeways appropriate to their classification. The plan’s primary road – an extension of Mistletoe Road through the site – will be built as a **boulevard-style street** consistent with City standards for an Avenue or Neighborhood Collector (including two travel lanes, bicycle lanes, sidewalks on both sides, and landscaping/stormwater swales). This new central boulevard creates a **seamless loop linking the Croman Mill District with the rest of the city’s street network**, improving overall connectivity. Secondary streets within the subdivision will be Local Streets per city standards (narrower neighborhood streets with parking and sidewalks) to promote low-speed, pedestrian-friendly circulation. Cul-de-sacs are avoided; the network is generally a grid or modified grid that distributes traffic and provides alternate routes. The street plan also aligns with connections envisioned in the Transportation System Plan and Croman District Plan – for example, maintaining the **existing Mistletoe Road alignment from Tolman Creek Road through to the northwest corner of the site**. All new streets will **transition smoothly to existing streets at the subdivision boundaries:** at the northwest, the Mistletoe extension will meet Siskiyou Boulevard at a new or improved intersection; at the south, Mistletoe ties into its existing segment at Tolman Creek Road; and to the west, local street stubs or multi-use path connections can link into the adjacent neighborhood if appropriate in the future. The design has been coordinated with Ashland Public Works and Fire Department to ensure adequate turning radii, grades, and two points of emergency egress (the looped street system provides redundancy for evacuation, addressing community safety concerns). **Public Utilities:** The development will be fully served by City **water, sewer, and electric utilities**. The preliminary utility plan (as shown on the Outline Plan) identifies all proposed utility line extensions, sizes, and easements. City water and sewer mains currently exist near the site (in Tolman Creek Rd/Mistletoe area and Siskiyou Blvd), and **these mains will be**

**extended through the project.** Phase One will include constructing trunk lines that not only serve Phase One lots but are **sized to accommodate future Phase Two and Three demands**, ensuring that as each phase comes online, adequate capacity is available. For example, an appropriately sized water loop will be installed through the site in Phase One, providing both domestic supply and fire flow capacity for all phases (hydrants will be placed per Fire Code). Similarly, sewer infrastructure will be extended to collect wastewater from all planned lots, with gravity flow to the existing municipal sewer or to a new lift station if needed (to be built in Phase One if required). The Electric Department has reviewed the concept and can serve the site; new underground electric conduit will be installed along streets, and transformers/boxes placed in utility easements as shown on the plat. All utility installations will conform to city engineering standards and any applicable Public Works Conditions. **Stormwater Drainage:** A detailed **stormwater management plan** has been prepared, consistent with the City's Stormwater Master Plan and AMC 18.4.6 requirements. The plan utilizes a **Low Impact Development** approach mandated for the Croman District: *"New streets shall be developed to capture and treat stormwater in a manner consistent with the Croman Mill District Stormwater Management Plan map, the Ashland Stormwater Master Plan and Green Streets Standards."* In compliance, the street cross-sections will integrate stormwater treatment facilities such as bioswales or rain gardens in the parkrows to filter runoff from streets and parking areas. The preliminary grading and drainage plan shows runoff being routed to these bio-swales and then to on-site detention ponds or oversized pipes, with a controlled discharge to the existing storm drain system at pre-development flow rates. A **central wetland or pond feature** is proposed as part of the open space – this will serve both as an amenity and a stormwater detention basin to manage peak flows, thereby protecting downstream drainage channels (e.g. Hamilton Creek) from erosion. The combination of green street design and detention ensures that post-development stormwater leaving the site will not exceed pre-development volumes or degrade water quality, in accordance with city standards. **Identification of Improvements and Dedications:** The preliminary plat and civil drawings clearly **identify all public improvements** to be constructed and any land to be dedicated to the public. This includes: dedication of new public street rights-of-way (the exact widths of each street ROW are labeled on the plat); public utility easements (PUEs) along lot frontages as required (typically 10 feet) for city utilities; dedication of the central park/open space tract (to be owned by a homeowners association or dedicated to the Parks Department, as negotiated, fulfilling AMC 18.3.2.070 open space requirements); and possibly the dedication of a transit stop easement if required

by RVTD for future bus service. All **Phase One public improvements will be constructed or financially assured** (bonded) in conjunction with the Phase One final plat, and the Outline Plan conditions will stipulate that subsequent phases cannot proceed without completing the necessary backbone infrastructure to serve them. Because the plan anticipates full build-out needs from the start, later phases will connect into pre-installed utility stubs and extend the Phase One streets, making each phase efficient and ensuring continuity. **Adjacent Land Transitions:** As noted under criterion (B), the infrastructure is also placed to enable logical extension if adjoining properties were ever to redevelop. For example, the northern street connection at Siskiyou Blvd could also serve any future development to the north of the site; and utility stubs at the property boundary could be provided if needed for any neighbor. In sum, the proposed streets, utilities, and drainage facilities meet all City design criteria and have been planned in a comprehensive manner to serve the entire project and tie into the city-wide network, satisfying AMC 18.5.3.050(G).

- **Criterion (AMC 18.5.3.050.H):** *“Unpaved Streets – Where a new subdivision street connects to an existing unpaved public street, the applicant must pave the existing street to City standards...”* **(or, conditions for allowing access via unpaved street).**  
**Finding: Satisfied / Not Applicable.**

This criterion is not triggered in a manner that impedes approval. **All streets providing access to the new lots will be paved** to City of Ashland standards. The primary access to the site is via Mistletoe Road and its extension, which the developer will improve as a fully paved public street. While a portion of Mistletoe Road off Tolman Creek Road was historically not built to full city standard, the project includes upgrading that segment as needed so that there will be a continuous paved access from the site to the nearest improved collector/arterial (Tolman Creek Road and Ashland Street). Thus, no new lot will rely on an unpaved roadway for access. In the event that any short section of existing street were allowed to remain temporarily unpaved (per Public Works’ discretion), the conditions in AMC 18.5.3.050.H.2 (minimum 20-ft width, grade under 10%, future participation in LID for paving, etc.) would be met. However, as it stands, the development will **construct or fund paving of all required access roads**, so this criterion is fully satisfied. The project does not seek any exception under these provisions; rather, it will bring Mistletoe Road and all new internal streets up to paved standards as part of the subdivision improvements.

- **Criterion (AMC 18.5.3.050.I):** *“Where an alley exists adjacent to the subdivision, access may be required to be taken from the alley and prohibited from the street.”*

**Finding: Not Applicable.** There are **no alleys abutting the subject property**. The site periphery is defined by public streets and other features, and no alleyway is present that could provide alternative access to the new lots. Therefore, this criterion does not apply. All access is taken from new public streets as addressed under criterion (F) above. The intent of this standard – to utilize alleys for access when available – is inherently met by the project’s street-based access design, and there is no conflict with AMC 18.5.3.050(I).

- **Criterion (AMC 18.5.3.050.J):** *“Required State and Federal permits, as applicable, have been obtained or can reasonably be obtained prior to development.”*

**Finding: Satisfied.** There are **no known state or federal discretionary permits** required for this subdivision that have not been addressed. The property is within the City limits (or will be annexed prior to development if needed), so no County land use permits apply. Regarding state/federal environmental regulations: The site is a former mill with some environmental contamination identified; the property owner is actively working with the **Oregon Department of Environmental Quality (DEQ)** under its Voluntary Cleanup Program. All required DEQ approvals for soil remediation are being obtained – for example, DEQ issued a Solid Waste Letter of Authorization in Nov. 2023 for removal of contaminated soil from the former burner sites. The **DEQ cleanup process is underway** and will continue in parallel with the land use process, ensuring that prior to any vertical development, the site will meet DEQ standards for residential and commercial use. This satisfies the requirement that state environmental clearances can be obtained. If any wetland fill or removal is necessary (unlikely, as natural areas are preserved), the developer would obtain a DSL/Army Corps permit under the Clean Water Act; initial site assessments indicate that significant wetlands will be avoided and left as open space, so such permits may not be needed. **State highway access:** The plan includes a new intersection or increased use of the Ashland Street (Highway 66) connection. The applicant has coordinated with the Oregon Department of Transportation, and any ODOT permits for roadway approach or right-of-way work on the state highway will be secured as part of the off-site improvements. These are standard and can certainly be obtained (ODOT has conceptually agreed to the access plan, subject to final permitting). **Transit:** Although not a permit per se, coordination with the regional

transit agency (RVTD) is ongoing to ensure transit service can be provided; the site's designation as a Climate-Friendly Area supports transit and the applicant will accommodate any required bus stop improvements. **Utilities:** The applicant will obtain an NPDES stormwater construction permit from DEQ prior to construction (for erosion control during construction activity exceeding one acre). This is a routine permit that will be acquired when construction drawings are finalized. No other federal permits are anticipated. In sum, the applicant either already has obtained, or can reasonably obtain, all necessary state and federal approvals for the project. There are no known regulatory barriers that would prevent the subdivision from being carried out as approved. Thus, AMC 18.5.3.050(J) is met.

*(Criterion (K) regarding flag lot standards is not applicable, as no flag lots are proposed.)*

## **5.2.2 Additional Findings – Walkable, Mixed-Use, Transit-Ready, and Sustainable Design**

Beyond the strict code criteria, the proposed Outline Plan embodies the broader **city-wide planning policies** promoting compact, walkable, and sustainable development. The **Ashland Comprehensive Plan's Transportation Element** strongly supports multi-modal transportation and "contains numerous goals and policies that encourage development of safer and more effective bicycle and pedestrian movement, reduce conflicts between modes, enhance the utility of transit, and make driving and parking more convenient and safer". This project advances those goals by creating a neighborhood where **pedestrians and cyclists have priority infrastructure** (trails, sidewalks, traffic-calmed streets) and where a potential **transit route** can loop through a dense mix of housing and jobs. All homes, jobs, and services within the Croman site will be connected by walkways and are within walking distance of future transit stops on the central boulevard, aligning with the City's TSP policies for transit-oriented development. Likewise, the **Ashland Climate and Energy Action Plan** emphasis on reducing vehicle miles traveled and encouraging energy-efficient land use is furthered by this proposal's mix of uses – residents can live, work, and shop in one neighborhood, reducing car dependence. The development also reflects the City's commitment to environmental stewardship. By **cleaning up a long-vacant brownfield** and reusing already urbanized land, it prevents sprawl into greenfields. By **incorporating green infrastructure** (street swales, preserved wetlands, solar-oriented lot layout, and likely all-electric building readiness), it demonstrates an ecologically responsive approach. The plan includes **extensive open spaces and parks** (central green, creek buffers, etc.) which will not only

serve the new population with recreation opportunities but also protect natural habitat and manage stormwater – a win for the environment and the community.

Finally, the proposal achieves the kind of **compact, mixed-use neighborhood form** promoted by regional and city policies (including the designation of the Croman site as a Climate-Friendly Area for higher-density growth). With approximately 500 housing units of various types (apartments, townhomes, cottages) interwoven with workplaces and a small neighborhood center, the development will foster a lively, **“live-work-play” community** that is economically and socially vibrant. The design standards of the Croman District will ensure high-quality architecture and urban design, creating a **unique identity** for the district that complements Ashland’s character while looking to the future. No exceptions to any standards were needed to accomplish this – the plan demonstrates that **Ashland’s codes and policies can be met outright** while delivering an innovative, sustainable neighborhood. These findings show that the application is not only code-compliant but also consistent with the **overall policy direction of the City of Ashland**.

**Conclusion (Type II Planning Application Approval Criteria):** Based on the above findings of fact, the proposed Croman Mill Outline Plan subdivision and Phase One preliminary plat meets all applicable approval criteria in AMC 18.5.3.050 and related chapters. The plan provides the required public facilities and design features for a walkable, transit-ready, mixed-use and ecologically responsible neighborhood without the need for any variances or exceptions. Phase One’s plat implements the first stage of this vision, and the Outline Plan ensures that as future phases come forward, they will do so in an orderly, code-compliant manner governed by this approval. The application therefore merits approval by the City of Ashland, with conditions as needed to verify continued compliance through final plan and construction.

### **5.3 Conclusion – Project Summary**

The **Croman Mill District Mixed-Use Development** as proposed is an exemplary project that aligns with the City of Ashland’s codes and comprehensive plan. The findings herein provide the evidentiary basis for an approval, and we respectfully request the Planning Commission’s approval of the Type II application. These findings will be forwarded to the City Council, demonstrating beyond doubt that all applicable criteria have been satisfied.