

**FOR OFFICE USE ONLY**Application #: AM-2025-105Date Received: 11/5/2025**City of Prineville****Revision/Amendment Application**PLEASE NOTE: INCOMPLETE APPLICATIONS WILL NOT BE ACCEPTED

ZONE MAP AMENDMENT: <input checked="" type="checkbox"/> M-1 TO C-2	ZONING CODE TEXT AMENDMENT: <input type="checkbox"/>	OTHER MAP AMENDMENTS: <input type="checkbox"/>
COMP PLAN MAP AMENDMENT: <input checked="" type="checkbox"/> HEAVY IND. TO OUTLYING COMMERCIAL	COMP PLAN TEXT AMENDMENT: <input type="checkbox"/>	OTHER TEXT AMENDMENTS: <input type="checkbox"/>

Brief description of proposed Amendment: AMEND COMP MAP FROM HEAVY INDUSTRIAL TO OUTLYING COMMERCIAL  
AMEND ZONING MAP FROM M-1 - LIGHT INDUSTRIAL TO C-2 GENERAL COMMERCIAL

**\*A PRE-APPLICATION APPOINTMENT IS REQUIRED FOR ALL AMENDMENTS\***Applicant's Name (print): JORDAN COGBURN, AICP Phone: (541) 780-5524E-Mail: JORDAN@LUA-CONSULTING.COMMailing Address: PO BOX 5831 City/State/Zip: EUGENE, OR 97405Property Owner's Name (if different): DIXIE LAND CO. (c/o Heidi Miller) Phone: (541) 971-7361Mailing Address: PO BOX 72 City/State/Zip: HALSEY, OR 97348Property Description: Township 14 Range 15 Section 36A0 Tax Lot 02501Current Zoning: M-1 LIGHT INDUSTRIAL Proposed Zoning: C-2 - GENERAL COMMERCIALCurrent Plan Designation: HEAVY INDUSTRIAL Proposed Designation: OUTLYING COMMERCIALApplicable State Goals: 1-14 Size of Affected Area: APPROX. 2.0 Acres**INSTRUCTIONS FOR COMPLETING THIS APPLICATION:**

1. Complete this application form including the appropriate signatures.
2. Include a detailed statement describing the proposal and how it meets all requirements of the appropriate State rules and statutes, and City codes and Comprehensive Plan policies. Text amendment applications must include the proposed language and the basis for the change.
3. If multiple properties are involved in this application, then identify each property on a separate page and follow with the property owners' signatures.
4. Submit the correct application fee.
5. Submit a copy of the current deed(s) for the property and Location Maps.

## Amendments

**Authorization to Initiate Amendments.** An amendment to the text of these standards, or to a zoning or plan map may initiated by either City Council or the Planning Commission. A property owner may initiate a request for a map or text amendment by filing an application with the Planning Department using the form(s) prescribed by the city and shall be accompanied by the required filing fees.

**Zone/Plan Map Amendments.** The Hearings Body shall, at its earliest practicable meeting after the filing of a petition by a property owner for a zone change/plan amendment with the Planning Department, hold a public hearing. The Planning Commission will, within five days of the public hearing, give its recommendations to the City Counsel.

**Justifying the zone change or plan amendment.** The burden of proof is upon the applicant to show how the proposed zone change of plan amendment is:


1. In conformity with all applicable State statutes.
2. In conformity with the State-wide planning goals where applicable.
3. In conformity with the Prineville Comprehensive Plan, land use requirements, policies and goals.
4. Needed due to a change of circumstances or a mistake in the original zoning.

**Public Hearing on Amendments.** If a map change is initiated by the Planning Commission or City Council, or if an amendment to the text of these standards is to be considered, the City Council shall hold a public hearing on the proposed change. Notice of the hearing shall be published in a newspaper of general circulation in the City for two weeks prior to the hearing.

**Limitations on Re-Applications.** No application of property owner for an amendment to the text of these standards or to the zoning map shall be considered within a six month period immediately following a previous denial application; if in the opinion of the Planning Department, new evidence or a change of circumstances warrant it, however, the Planning Department may permit a new application.

**By signing, the undersigned certifies that he/she has read and understood the requirements outlined above, and that he/she understands that omission of any listed item may cause delay in processing this application.**

**I (we) the undersigned acknowledge that the information supplied in this application is complete and accurate to the best of my (our) knowledge.**

Applicant:  Date: 11-5-25  
Signature

Property Owner:  Date: 11-3-25  
Signature

**If you are an authorized agent, please attach the letter of authorization signed by the owner.**

**Note: This may not be a complete list of information required to process and decide this request, and additional information may be required after further review by staff.**

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Map Lot 14-15-36A0-02501

# Comprehensive Map Amendment & Concurrent Zone Change

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Submitted: November 5, 2025

Applicant/Owner:

**Dixie Land, LLC**

PO Box 72

Halsey, Oregon 97348

Prepared by:

**LUA Consulting**

PO Box 5831

Eugene, OR 97405



## **GROCERY BANDIT – COMP PLAN MAP AND ZONING MAP AMENDMENTS**

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### **ATTACHMENTS**

Sheet A1.0 – Aerial Photo

Sheet A2.0 – Tax Assessor’s Map

Sheet A3.0 – Current/Proposed Zoning

Sheet A4.0 – Current/Proposed Comprehensive Plan Designation Map

Attachment “A” – Transight Consulting - Transportation Memorandum

## PART I - SUMMARY

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**Project Name:** Grocery Bandit – Comp. Plan Map Amendment and Zone Change

**Project Proposal:** This application seeks City of Prineville Approval for a Comprehensive Plan Map Amendment and concurrent Zoning Map Amendment.

The owner seeks to rezone the Industrially zoned site abutting the existing Commercially zoned site at 1220 N Gardner Road in conjunction with the current grocery use.

**Application:** Type-IV Comprehensive Plan Map Amendment and Zoning Map Amendment

**Project Location:** 1220 N Gardner Rd, Prineville, Oregon 97754

**Assessor's Map:** 14-15-36A0

**Tax Lot:** 2501

**Total Acres:** Approximately 2.0 acres

**Current Zoning:** M1 – Light Industrial

**Current Designation:** Heavy Industrial

**Proposed Zoning:** C2 – General Commercial

**Proposed Designation:** Outlying Commercial

**Project Team:** **Owner/Applicant**  
Dixie Land, LLC  
Contact: Heidi Miller or Sean Sullivan  
PO Box 72  
Halsey, Oregon 97348  
541-971-7361  
grocerydeal12@gmail.com

**Owner's Representative/ Land Use Professional**  
LUA Consulting  
Contact: Jordan Cogburn, AICP  
PO Box 5831  
Eugene, OR 97405  
541-780-5524  
Jordan@lua-consulting.com

## PART II – BACKGROUND

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The subject site (site) is an undeveloped vacant parcel abutting 1220 N Gardner Road in Prineville. The site is located in the M1 – Light Industrial Zone and is approximately 2.0 acres in size. The site has approximately 135 feet of frontage along N Gardner Road.

The site is abutting C2 zoned lands to the west and south (Tax Lots 2500 & 500), M1 Lands to the southwest (Tax Lot 700) and north-northeast (Tax Lots 2400 & 2600).

The existing Grocery Bandit commercial use abutting to the west is seeking to expand the commercial operations, including additional storage areas to the east of the existing structure. The anticipated commercial expansion will require the consolidation of the two jointly owned parcels into a single lot as the existing structure cannot be expanded across the current property line and the use is not on the list of allowed uses in the Light Industrial zone. Prior to the submittal of a consolidation application, the owner seeks to rezone the vacant parcel in order to avoid a split zoning.

This application respectfully requests approval of the proposed Comprehensive Plan Map and Zoning Map Amendments based on the following analysis, evidence, and associated attachments.

## PART III – DEVELOPMENT STANDARDS

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Part III addresses compliance with applicable development standards in Prineville Code (PC). Each applicable development standard is listed below in ***bold italics*** followed by findings demonstrating compliance.

### ***153.230 - AUTHORIZATION TO INITIATE AMENDMENTS.***

***An amendment to the Comprehensive Plan, text of this chapter or to a zone or plan map may be initiated by the City Council, by the City Planning Commission, by the City Planning Official, by any planning advisory committees duly appointed by the city, by any planning board established by this chapter or by an application of a property owner or the authorized agent thereof.***

We respectfully submit this Written Statement in support of the concurrent Comprehensive Plan Map and Zoning Map Amendment applications for consideration according to criteria by the Planning Commission and City Council, through public hearing processes, in compliance with this criterion.

### ***153.231 - APPLICATION FOR AMENDMENTS.***

***An application for an amendment to the Comprehensive Plan, text of this chapter or to a zone or plan map by a property owner or the authorized agent thereof shall be filed with the City Planning Official on forms prescribed by the city and shall be accompanied by the required filing fee as established by the City Council. For all others authorized to initiate amendments, the City shall be the applicant.***

***(A) Criteria for Amendments. The burden of proof is upon the applicant. The applicant shall show the proposed change is:***

***(1) In conformity with all applicable state statutes;***



- (2) In conformity with statewide planning goals and implementing administrative rules when determined to be applicable;***
- (3) In conformity with the goals, objectives and policies of the city's Comprehensive Plan;***
- (4) Due to a change in circumstance or further studies justifying the amendment or mistake in the original zoning.***

Sufficient evidence showing compliance with applicable state statutes, statewide planning goals, and the City's Comprehensive Plan are provided throughout this written statement. Additionally, the proposed Comprehensive Plan Map Amendment and Zone Change are in direct response to a change in the use patterns in the area of the subject property. The proposed commercial zoning and designation directly address the need for commercial services within the industrial area, and to mitigate excess travel times for access to these services based on the recommendations listed in Attachment A.

### **CONFORMANCE WITH THE STATE ADMINISTRATIVE RULES (OAR)**

#### **OAR 660-015, Statewide Planning Goals**

***Goal 1 - Citizen Involvement, "To develop a citizen involvement program that ensures the opportunity for citizens to be involved in all phases of the planning process." Statewide planning Goal 1 requires that the City provide the opportunity for citizens to be involved in the planning process.***

As part of this application processing, notice of the public hearing will be publicly posted, mailed to interested parties, and published in the local newspaper. Citizens will be provided the opportunity to comment on the proposed amendments at the public hearings before the Planning Commission and the City Council, or in writing in advance of the hearings. As such, opportunities will be made to ensure citizens can be involved in the planning process.

***Goal 2 - Land Use Planning. "To establish a land use planning process and policy framework as a basis for all decision and actions related to use of land and to assure an adequate factual base for such decisions and actions." Goal 2 outlines the basic procedures of Oregon's statewide planning program. Land use decisions are to be made in accordance with a comprehensive plan, and that suitable "implementation ordinances" to put the plan's policies into effect must be adopted. It requires that plans be based on "factual information"; that local plans and ordinances are coordinated with those of other jurisdictions and agencies; and that plans be reviewed periodically and amended as needed.***

As required by Goal 2, the City has adopted criteria and procedures through the Prineville Land Use Code as the tool for implementing the goals within the Comprehensive Plan. Goal 2 requires periodic review and amendments to ordinances as needed and in accordance with the Comprehensive Plan. The proposed amendments meet the requirements of Goal 2 by following the appropriate procedures for amendments and by considering the goals and policies outlined in the Comprehensive Plan. The proposal will be reviewed according to the established local land use regulations, including the City's Zoning Ordinance and the Comprehensive Plan.

***Goal 3 - Agricultural Lands. Goal 3 requires counties to inventory agricultural lands and to "preserve and maintain" them through farm zoning outside of urban growth boundaries.***

Goal 3 is not required for compliance within the Urban Growth Boundary, nor is the site designated for Agricultural uses. Additionally, the proposed map amendments do not adversely impact the ability of the City to plan for agricultural transition opportunities within the City.

***Goal 4 - Forest Lands. This goal defines forest lands and requires counties to inventory them and adopt policies and ordinances that will "conserve forest lands for forest uses."***

The proposed map amendments are consistent with Forest Lands (Goal 4) and Goal policies, as they do not adversely impact the ability of the City to plan for the appropriate transition of Forest lands within the City of Prineville.

***Goal 5 - Open Spaces, Scenic and Historic Areas and Natural Resources. Goal 5 covers more than a dozen natural and cultural resources such as wildlife habitats and wetlands. It establishes a process for each resource to be inventoried and evaluated. If a resource or site is found to be significant, a local government has three policy choices: preserve the resource, allow proposed uses that conflict with it, or strike some sort of a balance between the resource and the uses that would conflict with it.***

Ochoco Creek is located along the southern portions of the site and is listed as a Goal 5 resource for the City of Prineville. The proposed amendments are consistent with Goal 5 and the Comprehensive Plan policies, as they do not adversely impact the ability of the City to protect the important natural resources and environmental elements within the City through administration of the Land Use Code and protections through Zoning Overlays and environmental permitting processes. No construction or development is proposed as part of the application. Any future development of the subject property will be required to submit a site plan application, which will be reviewed for compliance with the applicable standards.

***Goal 6 - Air, Water and Land Resources Quality. This goal requires local comprehensive plans and implementing measures to be consistent with state and federal regulations on matters such as groundwater pollution. All waste and process discharges from future development, when combined with such discharges from existing development shall not threaten to violate, or violate applicable state or federal environmental quality statutes, rules and standards.***

The proposed amendments are consistent with Goal 6 and the Goal policies, as they do not adversely impact the ability of the City to protect air, water, and land resources quality. No construction or development is proposed as part of the application. Any future development of the subject property will be required to submit a site plan application, which will be reviewed for compliance with water, sewer, stormwater, and transportation requirements.

***Goal 7 - Natural Hazards. Goal 7 focuses on local government planning to protect people and property from natural hazards.***

The proposed amendments do not impact the City's ability to plan for natural hazards and mitigate risks. Portions of the site are within the 100-year floodplain, but the applicant is not aware of any known geologic faults on the property. There is no particular designation that makes the subject property more hazardous than any other properties in the area. Therefore, the proposal is consistent with Goal 7 and the Goal policies, as they do not adversely impact the ability of the City to protect people and property from natural hazards. No construction or development is proposed as part of the application. Any future development of the subject property will be required to submit a site plan application, which will be reviewed for compliance with any documented Flood Hazard or other Natural Hazard requirements.

***Goal 8 - Recreational Needs. This goal calls for each community to satisfy the recreational needs of the citizens and visitors and, where appropriate, to provide for the siting of necessary recreational facilities including destination resorts.***

The proposed amendments do not impact the City's ability to plan for the recreational needs of the citizens and visitors. Additionally, the subject property has not been listed in any inventory of recreational needs, is not needed to provide recreational needs of the citizens of the state, and

is not identified as a Goal 8 resources, therefore, Goal 8 is not directly applicable to this proposal.

***Goal 9 - Economic Development. Goal 9 calls for diversification and improvement of the economy. It requires communities to inventory commercial and industrial lands, project future needs for such lands, and plan and zone enough land to meet those needs.***

The proposed map amendments directly support the City's efforts to accommodate diversification and improvement of the economy by increasing opportunities for a variety of employment uses in the industrial area. The proposed amendments increase the land available for commercial uses in the C2 zone and will create the opportunity for needed local services in this area. As the proposed change is from industrial to commercial, there is no reduction in employment lands.

***Goal 10 – Housing. This goal specifies that each city must plan for and accommodate needed housing types, such as multifamily and manufactured housing. It requires each city to inventory its buildable residential lands, project future needs for such lands, and plan and zone enough buildable land to meet those needs. It also prohibits local plans from discriminating against needed housing types.***

The proposed map amendments do not impact the City's ability to provide for the housing needs of its citizens. The proposed amendments will not reduce residential inventories and the subject property has not been contemplated for residential uses.

***Goal 11 - Public Facilities and Services. Goal 11 calls for efficient planning of public services such as sewers, water, law enforcement, and fire protection. The goal's central concept is that public services should be planned in accordance with a community's needs and capacities rather than be forced to respond to development as it occurs. OAR 660-11 implements Goal 11, and notes, "Cities or counties shall develop and adopt a public facility plan for areas within an urban growth boundary containing a population greater than 2,500 persons..."***

The proposed amendments do not adversely impact the City's ability to plan and develop a timely, orderly and efficient arrangement of public facilities. As addressed herein, the City has adequate water, sewer and transportation capacities to serve the subject property. No construction or development is proposed as part of the application. Any future development of the subject property will be required to submit a site plan application, which will be reviewed for compliance with public facility requirements documented in the adopted Public Facilities Plan.

***Goal 12 – Transportation. Goal 12 aims to provide "a safe, convenient and economic transportation system." Goal 12 is implemented through the Transportation Planning Rule (TPR), OAR 660-012-0060, in addition to local land use regulations.***

The proposed amendments do not adversely impact the City's ability to provide a safe convenient and economic transportation system. Attachment A provides an analysis of the proposed Comprehensive Plan Map Amendment and Zone Change based on anticipated uses associated with the proposed zone change. The memo concludes: The rezone analysis only supports the modification of the zoning through comparative reasonable build-out scenarios, showing that there are no needed changes to long-range transportation plans at this step in the process. Further transportation materials will be required to support any future development per the City's requirements.

Further, in response to the TPR requirements of OAR 660-012-0060(1), the memo concludes: The site should be rezoned with a limitation on the development (trip cap) of 599 weekday daily trips and 78 weekday p.m. peak hour trips, limiting the trip generation potential of the property to what could otherwise be developed within the existing zoning. Any development that remains



within this trip cap will not create a significant impact on the transportation system. Note that further traffic analysis will still be required for site entitlements purposes (to demonstrate the actual system capacity).

Any future development of the parcel below these levels will avoid impacts to the required planning assumptions, functional classification system, and surrounding improvement projects within the City (and State) TSP.

***Goal 13 - Energy Conservation. Goal 13 requires that "land and uses developed on the land shall be managed and controlled so as to maximize the conservation of all forms of energy, based upon sound economic principles."***

The proposed amendments do not adversely impact the City's ability to provide a range of land uses and densities to encourage energy conservation. Further, the proposed map amendments support the development of land within the UGB, rather than outside of the UGB. Development of land within the UGB encourages reduced vehicle miles traveled by keeping the destination within the city, rather than other regional cities or areas outside the city, supporting the City's goals for conservation. The proposed amendments will allow the property to expand existing commercial services within the area to mitigate excess travel times for access to these services. The proposal directly supports Goal 13 by entitling a property to reduce energy usage in travel time to/from the area to reach services. As such, compliance with Goal 13 is maintained.

***Goal 14 – Urbanization. This goal requires cities to estimate future growth and needs for land and then plan and zone enough land to meet those needs. It requires cities to provide for an orderly and efficient transition from rural to urban land uses, and to accommodate urban population and employment inside urban growth boundaries, while ensuring efficient use of land.***

The proposed amendments directly support the City's efforts to accommodate urban populations and employment inside the urban growth boundary by creating a variety of employment land within the UGB, and more specifically, by entitling employment land that can house convenience services to serve employment lands in the industrial area.

#### ***Goals 15-19***

These goals are not applicable to the proposed map amendments.

#### ***OAR 660-009, Economic Development***

##### ***660-009-0000***

##### ***Intent and Purpose***

***The intent of the Land Conservation and Development Commission is to provide an adequate land supply for economic development and employment growth in Oregon. The intent of this division is to link planning for an adequate land supply to infrastructure planning, community involvement and coordination among local governments and the state. The purpose of this division is to implement Goal 9, Economy of the State (OAR 660-015-0000(9)), and ORS 197.712(2)(a) to (d). This division responds to legislative direction to assure that comprehensive plans and land use regulations are updated to provide adequate opportunities for a variety of economic activities throughout the state (ORS 197.712(1)) and to assure that comprehensive plans are based on information about state and national economic trends (ORS 197.717(2)).***

The proposed Comprehensive Plan Map amendment and Zone Change are directly supportive of the intent and purpose of OAR 660-009, to assist in providing an adequate land supply for economic development and employment growth in the City of Prineville. The comprehensive plan map amendment/zone change increases the variety of types of employment land available

within city limits. Both the quantity and type of employment lands available are critical to providing adequate supply of land, which are both addressed in the submitted applications.

#### **660-009-0025**

##### ***Designation of Lands for Industrial and Other Employment Uses***

***Cities and counties must adopt measures adequate to implement policies adopted pursuant to OAR 660-009-0020. Appropriate implementing measures include amendments to plan and zone map designations, land use regulations, public facility plans, and transportation system plans.***

Chapter 5 of the City's Comprehensive Plan includes Goal #1 with several policies; most notable to this application is: Updates to the inventories may be required in response to redevelopment, proposed zone changes, mixed-use development techniques and planned unit developments that enable "complete neighborhood" concepts and economic development opportunities. This policy suggests that the City values the idea of mixed uses and integration of uses, rather than singular uses in an area, in its support of "complete neighborhood" concepts. The proposed amendments allow the subject property to introduce a variety of commercial services to an area that is largely homogenous with industrial uses. The expansion of an existing commercial area provides more complete neighborhood uses and services in the immediate area.

***(1) Identification of Needed Sites. The plan must identify the approximate number, acreage and site characteristics of sites needed to accommodate industrial and other employment uses to implement plan policies. Plans do not need to provide a different type of site for each industrial or other employment use. Compatible uses with similar site characteristics may be combined into broad site categories. Several broad site categories will provide for industrial and other employment uses likely to occur in most planning areas. Cities and counties may also designate mixed-use zones to meet multiple needs in a given location.***

***(2) Total Land Supply. Plans must designate serviceable land suitable to meet the site needs identified in section (1) of this rule. Except as provided for in section (5) of this rule, the total acreage of land designated must at least equal the total projected land needs for each industrial or other employment use category identified in the plan during the 20-year planning period.***

The amendments are proposed by a property owner, not the City. As such, the property owner is not required to develop the City's 20-year planning forecast needs for industrial lands. However, the proposal directly supports the intent of the above requirements ((1) and (2)) to provide a site for needed industrial and other employment uses, including being able to offer commercial services that support the employees and residents in the area.

***(3) Short-Term Supply of Land. Plans for cities and counties within a Metropolitan Planning Organization or cities and counties that adopt policies relating to the short-term supply of land must designate suitable land to respond to economic development opportunities as they arise. Cities and counties may maintain the short-term supply of land according to the strategies adopted pursuant to OAR 660-009-0020(2).***

***(a) Except as provided for in subsections (b) and (c), cities and counties subject to this section must provide at least 25 percent of the total land supply within the urban growth boundary designated for industrial and other employment uses as short-term supply.***

***(b) Affected cities and counties that are unable to achieve the target in subsection (a) above may set an alternative target based on their economic opportunities analysis.***

***(c) A planning area with 10 percent or more of the total land supply enrolled in Oregon's industrial site certification program pursuant to ORS 284.565 satisfies the requirements of this section.***

The City's Comprehensive Plan includes policies to ensure adequate supply of lands, however, does not specifically include policies and data related to the short-term supply of land. However, this proposal directly supports an immediate short-term need for commercial land (C2 zone).

***(4) If cities and counties are required to prepare a public facility plan or transportation system plan by OAR chapter 660, division 011 or division 012, the city or county must complete subsections (a) to (c) of this section at the time of periodic review.***

***Requirements of this rule apply only to city and county decisions made at the time of periodic review...***

This section is not applicable as the City is not undertaking a public facilities plan or transportation planning activities as part of this application.

***(5) Institutional Uses. Cities and counties are not required to designate institutional uses on privately owned land when implementing section (2) of this rule. Cities and counties may designate land in an industrial or other employment land category to compensate for any institutional land demand that is not designated under this section...***

This section is not applicable as the City is not evaluating institutional uses or institutional lands as part of this application.

***(6) Compatibility. Cities and counties are strongly encouraged to manage encroachment and intrusion of uses incompatible with industrial and other employment uses.***

***Strategies for managing encroachment and intrusion of incompatible uses include, but are not limited to, transition areas around uses having negative impacts on surrounding areas, design criteria, district designations, and limiting non-essential uses within districts.***

The site will continue to be compatible with surrounding uses based on the existing Commercial zoning pattern to the west and south. In fact, as previously noted, Chapter 5 of the City's Comprehensive Plan includes policies specific to this application, including: *Updates to the inventories may be required in response to redevelopment, proposed zone changes, mixed-use development techniques and planned unit developments that enable "complete neighborhood" concepts and economic development opportunities.* This policy suggests that the City values the idea of mixed uses and integration of uses, rather than singular uses in an area, in its support of "complete neighborhood" concepts. The proposed amendments allow the subject property to continue to employ a variety of commercial services within a compatible area, transitioning from commercial to industrial uses. The expansion of an existing commercial area provides more complete neighborhood uses and services in the immediate area.

### ***OAR 660-012-0060, Transportation Planning Rule***

#### ***660-012-0060 Plan and Land Use Regulation Amendments***

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



**(9) or (10) of this rule. A plan or land use regulation amendment significantly affects a transportation facility if it would:**

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

Based on the proposed trip caps within Attachment A, the proposed zone change will not result in the need for additional changes to the functional classification of existing or planned transportation facilities. Accordingly, this section is not triggered.

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

This proposal does not seek to change the standards of the City's functional classification system.

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

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

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

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

Attachment A includes a transportation memo specific to the proposed Zone Change and Comprehensive Plan Map Amendment based on a conceptual site plan. The memo concludes: The rezone analysis only supports the modification of the zoning through comparative reasonable build-out scenarios, showing that there are no needed changes to long-range transportation plans at this step in the process. Further transportation materials will be required to support any future development per the City's requirements.

Further, in response to the TPR requirements of OAR 660-012-0060(1), the memo concludes: The site should be rezoned with a limitation on the development (trip cap) of 599 weekday daily trips and 78 weekday p.m. peak hour trips, limiting the trip generation potential of the property to what could otherwise be developed within the existing zoning. Any development that remains within this trip cap will not create a significant impact on the transportation system. Any future development of the parcel below the proposed levels will avoid impacts to the required planning assumptions, functional classification system, and surrounding improvement projects within the City (and State) TSP. As no development is proposed at this time, additional traffic analysis will be required to show compliance with the minimum standards as part of any future development application. Future applications will be coordinated with the City and ODOT as the relevant agencies

with jurisdiction over the impacted transportation facilities, in compliance with Section (4). Attachment A can be referenced for additional details of the analysis.

As shown within the attached memo and the findings here, the anticipated trip generation potential does not degrade the performance of any facilities, existing or planned. Therefore, the Zone Change and Comprehensive Plan Map Amendment application complies with the Transportation Planning Rule.

### **Conformance with the City of Prineville Comprehensive Plan**

#### **Chapter 1 Community Characteristics**

##### **Goal # 1: Improve the function and appearance of the community's residential neighborhoods, commercial and industrial areas.**

As noted previously, the site is currently vacant and is abutting an existing commercial grocery facility. The requested zoning directly supports this City goal by allowing the subject property to expand the grocery facility to the east and improve the appearance of an undeveloped parcel near a highly visible intersection. The change will ensure that vehicle trips are maintained, while improving the appearance of the area by way of appropriate and compatible development.

#### **Chapter 2 Urban Land Uses and Zoning Regulations**

##### **Goal # 1: Create land use zones and land use regulations that enhance Prineville without sacrificing community values.**

Chapter 2 continues under Goal 1 to list “Industrial Zone Values and Policies”, noting several items, including: *Industrial zones should provide places for manufacturing, repair, with potential for high concentrations of jobs, products, and services in areas that can be conveniently served by transportation and easily accessed by high numbers of employees. Industrial areas that provide mixed-use opportunities and service uses for employees can reduce excess vehicle trips and community subsidy. They should be encouraged in industrial zones subject to proper siting and regulations that limit standard or non-workforce housing.*

The proposed commercial zoning and designation directly support this goal and subsequent policies by providing services in an area that can be conveniently accessed by a high number of employees.

##### **Goal # 4: Establish appropriate land use regulations to support a sustainable community.**

Goal #4 of Chapter 2 is supported by several values and policies, including: *The City shall:*  
*5. Promote land use regulations that encourage energy conservation and reduce air pollution.*

The proposed commercial zoning and designation directly support this goal and subsequent policy by entitling the subject property to provide commercial uses in the industrial area, reducing the need for employees to travel outside the area for some daily conveniences (food, coffee, etc.). By providing these services nearby the industrial workplaces, miles traveled in the area can be reduced, directly reducing energy usage and associated air pollution.

#### **Chapter 5 Economy**

##### **Goal # 1: Provide adequate industrial and commercial land inventories to satisfy the urban development needs of Prineville for at least the 20 year planning horizon.**

Chapter 5's Goal #1 includes several policies; most notable to this application is: *Updates to the inventories may be required in response to redevelopment, proposed zone changes, mixed-use development techniques and planned unit developments that enable “complete neighborhood” concepts and economic development opportunities.*

This policy suggests that the City values the idea of mixed uses and integration of uses, rather than singular uses in an area, in its support of “complete neighborhood” concepts.

The proposed commercial zoning and designation entitle the subject property to introduce a variety of commercial services directly abutting an existing C2 zoned parcel, and adjacent to an area that is largely homogenous with industrial uses. The expansion of a small commercial area will bring the site into a more complete configuration, providing more diverse uses and services in the immediate area.

#### ***Chapter 8 Public Services and Facilities***

#### ***Goal # 2: Create a system of conservation practices for public resources, services, and related facilities.***

The proposed commercial zoning and designation directly support this goal by allowing the subject property to provide commercial uses to the light industrial and adjacent residential areas, reducing the need for employees and residents to travel outside the area for some daily conveniences (food, coffee, etc.). By providing these services nearby the industrial workplaces and residential neighborhoods, miles traveled in the area can be reduced, directly reducing usage and impacts to the local transportation facilities.

## **PART IV – CONCLUSION**

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In conclusion, the proposed Comprehensive Plan Map Amendment and Concurrent Zone Change request complies with applicable Prineville Code approval criteria or can be made so with appropriate and reasonable Conditions of Approval. The Written Statement and supporting Attachments, provide substantial evidence to support approval of the application.

If there are questions or comments, please contact Jordan Cogburn at 541-780-5524, or [Jordan@lua-consulting.com](mailto:Jordan@lua-consulting.com)

Sincerely,

Jordan Cogburn, AICP  
LUA Consulting

**END OF WRITTEN STATEMENT**



SOURCE: CROOK COUNTY GIS, 2023 IMAGERY: <https://gis.crookcountyor.gov/portal/apps/experiencebuilder/experience>  
SCALE: NOT TO SCALE



LAND USE ADVANTAGE CONSULTING  
PO BOX 5831 EUGENE, OR 97405  
(541)780-5524 [LUA-CONSULTING.COM](http://LUA-CONSULTING.COM)

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TAX LOT 14-15-36A0-02501  
GROCERY BANDIT - CMA & RZ

DIXIE LAND COMPANY  
PO BOX 72, HALSEY, OR 97348

PROJECT: GROCERY DEALS - CMA & RZ  
MODEL FILE:  
GROCERY-DEALS-A1.0  
DRAWN BY: JDC DATE: 11-3-25

SHEET TITLE  
CMA & RZ  
AERIAL PHOTO

A1.0

Date:	October 21, 2025
To:	Josh Smith, City of Prineville
From:	Joe Bessman, PE
Project Reference No.:	2099
Project Name:	Grocery Bandit Rezone



## PURPOSE

The purpose of this memorandum is to provide a zone change analysis for the northern parcel of the Grocery Bandit property located at 1220 N Gardner Road in Prineville, Oregon, 97754. The site is map and tax lot 141536A002501, and the requested modification is to change the current northern portion of the site from its M-1 (Light Industrial) designation to C-2, consistent with the zoning of the adjacent parcel containing the Grocery Bandit store. The intent of the rezone is to allow property uses within the adjacent property that support the grocery store. Figure 1 illustrates the site vicinity map showing the location and zoning of the Grocery Bandit parcels.



Figure 1. Site Vicinity Map. Map Source: Crook County GIS

## TRANSPORTATION PLANNING RULE COMPLIANCE

The subject application proposes a Comprehensive Plan amendment and rezone of the undeveloped northeastern parcel from *Light Industrial* (M-1) zoning to *General Commercial* (C-2) to support the Grocery Bandit site with parking, circulation, inventory and outdoor display storage, and increased future opportunities for store growth or other supporting uses. The Grocery Bandit store sits on the adjacent 1.37-acre property, but, like the proposed site, much of this space is encumbered by Ochoco Creek and associated setbacks.

In order to rezone the subject property, the application is required to demonstrate compliance with the Transportation Planning Rule (TPR) section on Plan and Land Use Regulation Amendments (OAR 660-12-0060). OAR 660-012-0060(1) and (2) establish a two-step process for evaluating a land use amendment's impact on the transportation system. The first step in assessing an amendment's potential transportation impact is to compare the trip generation potential of the property assuming a "reasonable worst-case" development scenario under the existing and proposed zoning. If the trip generation potential increases under the proposed zoning, additional operational analysis may be required to assess whether the rezone will "significantly affect" the transportation system. Conversely, if the trip generation under the proposed zoning is equal to or less than that under the existing zoning, no additional operational analysis is necessary to conclude that the proposal does not "significantly affect" the transportation system. A review of the purpose and allowance within these zoning designations is provided below.

### Existing and Proposed Zoning Designations and Purpose

The stated purpose of the current *Light Industrial* zoning district (per Prineville Code 153.060) is as follows:

*The purpose of the Light Industrial M-1 Zone is to provide for a wide range of industrial uses, but limiting or excluding those industrial uses which are generally not considered compatible with adjoining commercial or residential areas and which, in many cases, involve industrial uses which involve hazardous or nuisance creating conditions.*

In contrast, Prineville Code 153.050 states the purpose of the *Central Commercial* zoning district is as follows:

*The purpose of the C-2 Zone is to provide for those commercial uses which are considered more desirable to be located in an area outside of the downtown commercial core area, that are more dependent upon and create the highest volumes of vehicular traffic, are considered the heaviest or most intensive type of commercial uses, which actually involve a combination of heavy commercial and light industrial type uses, which commonly involve expansive areas of outside storage and displays of products and are more traveler oriented.*

A comparison of the more intense allowable uses (from a trip generation perspective) between the zoning designations is summarized in Table 1.



**Table 1. Comparison of Allowable Use by Zoning Designation**

Use	Allowed in M-1 Zone?	Allowed in C-2 Zone?
Child Care Home	Yes	Yes
Residential Use Above Ground Level Commercial	No	Yes
Preschool	No	Yes
Bakery (Retail/Sit-Down)	No	Yes
Brew Pub or Restaurant (Sit-Down)	No	Yes
Drive-through Restaurant/Café	No	Yes
Food Vendor Site	No	Yes
Movie Theater	No	Yes
Indoor Recreation	No	Yes
Auto Sales	Yes	Yes
Truck Stop (with convenience store/carwash/café)	Yes	No
Auto Service Station (with convenience store/carwash)	No	Yes
RV Sales, Service, and Storage	Yes	No
Manufacturing/Industrial	Yes	No
Distribution	Yes	No
Office	No	Yes
Call Center	Yes	No
Convenience Store	No	Yes
Drug Store/Pharmacy	No	Yes
Retail Sales/Service	No	Yes
Grocery Store/Market	No	Yes
Hardware Store	No	Yes
Bank	No	Yes
Gym/Fitness Center	No	Yes

In review of Prineville Code, the primary difference between these zones is the broad allowance of retail uses within the C-2 zoning, and the primary allowance of industrial and heavy machinery related uses within the M-1 zoning. Notably, the M-1 zoning does allow a Truck Stop (including convenience market, carwash, and café) or a call center, and the C-2 zoning allows a range of food and beverage, convenience/fuel centers, and grocery stores.

## REASONABLE “WORST-CASE” TRIP GENERATION SCENARIOS

Using the higher-intensity outright uses listed within Table 1, trip generation estimates were prepared for the site to assess whether the proposed rezone has the potential to increase the number (and types) of trips from the site. All trip generation estimates were prepared using ITE’s standard reference *Trip Generation*, and data from the recently released 12<sup>th</sup> Edition was reviewed.

### Existing Light Industrial (M-1) Zoning Scenario

The site currently has an existing approximately 77,000 square-foot building on the south side of the site that was formally used as a call center. The northern portion of the site is undeveloped. The existing zoning potential considers the use of the entire 15.9-acre site for the highest reasonable trip generation potential. While the call center was a previous use of the site, the existing zoning would allow the entire site to be developed with potentially more intense uses, which could include eating establishments, a bank, manufacturing combined with retail sales, or a gym. A review of the trip generation potential of some of the higher trip generating uses is shown in Table 2.

**Table 2. Outright Allowable Light Industrial (M-1) Trip Generation Rates (ITE 12<sup>th</sup> Edition)**

Land Use	ITE Land Use Code/Surrogate	Weekday Daily Trips	Weekday PM Peak Hour Trip Rate
Truck Stop	ITE 955 - Travel Center	366.65/KSF	23.58/KSF
Call Center	ITE 710 – Office (Per Person)	3.44/Emp	0.45/Emp

Table 2 shows that Truck Stops and Call Centers both contain a high trip rate, but these uses apply varying metrics to assess the number of trips. Call center trip rates would be appropriately assessed based on the number of employees, whereas a Truck Stop/Travel Center has trip rates based on the size of the building. For this comparison, it is also important to understand that the size of the subject property is 2.0 acres, and the adjacent parcel to the north also contains M-1 zoning. The average size of a Travel Center includes a 10,000 square-foot building with ample passenger vehicle and truck parking, maneuvering, and fueling space. While this use is allowed, it does not reflect a “reasonable” development scenario, unless the land was developed with the adjacent parcel.

The trip rate for a call center would be best developed using the number of employees. Based on average office space providing a Floor-to-Area Ratio of 0.25, the site could support about 22,000 square-feet of office space. Information on Call Centers indicates that the average cubicle size ranges from 36 to 64 square-feet, versus a typical office space that provides 150 to 175 square-feet per person (about three times the density). Based on the ITE relationship between employee-based trips and building-size based trips, a typical 22,000 square-foot office would include 58 employees. This would equate to a call center with up to 174 persons (which could occur over multiple shifts).

### Proposed General Commercial (C-2) Zoning Scenario

The proposed C-2 zoning allows drive-through uses, fuel centers, and convenience stores as the most intense outright allowable uses. The two-acre size of the parcel would support the layout and parking of a fuel center and convenience market as a “worst-case” scenario. Most often, retail uses on this type of parcel would include one building with multiple suites (with an FAR of 0.15 to 0.25), and it would be unlikely that every suite would support a food and beverage tenant, instead falling into a general retail classification (such as ITE’s “Strip Retail Plaza”). Unlike the call center, this type of use would also experience a portion of pass-by trips that are not entirely new on the transportation system but would

likely divert from US 26 to access the site prior to returning on their primary trip. Trip generation rates for the higher-intensity uses allowed within the C-2 zoning are provided in Table 3.

**Table 3. Outright Allowable Central Commercial (C-2) Trip Generation Rates (ITE 12<sup>th</sup> Edition)**

Land Use	ITE Land Use Code/Surrogate	Weekday Daily Trips	Weekday PM Peak Hour Trip Rate
Eating and Drinking Establishment	ITE 930 (Fast Casual)	225.89/KSF	14.35 /KSF
	ITE 932 (High-Turnover Sit-Down Restaurant)	103.75/KSF	9.18 /KSF
	ITE 933 (Fast Food Restaurant without Drive-Thru)	413.41/KSF	36.73/KSF
	ITE 934 (Fast Food Restaurant with Drive-Thru)	448.12/KSF	31.60/KSF
Bank	ITE 912 (Bank)	98.85/KSF	21.03/KSF
Fuel Center/C-Store	ITE 945 (Convenience Store/Gas Station)	211.05/VFP	15.85/VFP
Strip Retail Plaza (<40K)	ITE 822	54.45/KSF	6.29/KSF

Table 3 shows that trip rates for food and beverage uses are high, with convenience-oriented/fast-food uses and fuel centers/convenience markets providing the highest overall trip rates of these options. While gas stations and convenience markets generate the highest number of trips, most of these trips are pass-by, with reduced “net new” impacts on the transportation system. Note that while most of these uses are based on square-footage of the building, the fuel center is based on fueling positions, and a typical gas station includes 12 positions whereas a fast-food restaurant is about 3,000 square-feet and a sit-down restaurant is about 5,000 square-feet.

### Trip Generation Rate Comparison

Trip generation rates for the M-1 and C-2 zoning scenarios were prepared based on the general land use assumptions described above, and also account for pass-by trips for retail uses. These scenarios show that the retail uses of the property allowed within the C-2 zoning could increase the overall trip generation potential of the site.

**Table 4. Comparative Trip Generation Estimates (ITE Trip Generation, 12<sup>th</sup> Edition)**

Land Use	ITE Code	Size/Units	Weekday Daily Trips	Weekday PM Peak Hour		
				Total	In	Out
Existing "Worst-Case" M-1 Zoning Scenario						
Call Center / Office	710	174 Emp	599	78	14	64
Proposed "Worst-Case" C-2 Zoning Scenario						
Fast Food w/o Drive-Thru	933	6,000 SF (two uses)	2,480	220	106	114
Pass-by Trips 55%			-1,364	-121	-58	-63
Total Trips			1,116	99	48	51
Free-Standing Discount Store	815	20,000 SF	1,077	97	49	48
Pass-by Trips 20%			-215	-19	-10	-9
Total Trips			858	78	39	39
Strip Retail Plaza (<40k)	822	20,000 SF	1,089	126	63	63
Pass-by Trips 40%			-436	-50	-25	-25
Total Trips			653	76	38	38
Convenience Store/ Gas Station	945	SF: VFP: 4,100 SF 12 pos.	2,442	230	115	115
			2,383	206	103	103
			2,412	218	109	109
Pass-by Trips (75%)			-1,809	-164	-82	-82
Total Trips			603	54	27	27

In discussions with the project team it was understood that the purpose of this rezone is not to accommodate a large-scale expansion of the Grocery Bandit, but to provide supportive outdoor displays, improved inventory storage, and improve the parking and circulation of the existing building. These types of uses provide limited overall changes to the site trip generation potential, and would remain well within the trips that could be generated within the existing zoning.

As the Grocery Bandit would be best classified as a discount grocery store, the most appropriate classification of the Grocery Bandit would be ITE's *Free-Standing Discount Store* (ITE Land Use 815). This is a classification that would also apply to similar uses such as *Grocery Outlet* stores (reflective of datapoints within the ITE land use within the 20KSF range), or older Walmart stores (reflective of datapoints in the 100KSF+ range). Table 4 shows that this land use generates an identical number of trips during the critical weekday p.m. peak hour as the potential call center, with the potential for about +259 more weekday daily trips.

Other uses contemplated on the site include storage (mini-warehouse) or other types of low-intensity uses. These uses are all well below the "worst-case" trip rates shown in Table 4, and would remain less than the allowed call center within the existing M-1 zoning.

**Is the evaluation of significant effect based on the applicants proposed use or other uses allowed by the proposed plan or zone change?**

Generally speaking the evaluation of whether there is a significant effect must consider the range of uses allowed by the proposed plan and zoning changes, not just the particular use proposed by the applicant. This is because the resulting plan amendment or zone change, once approved, would allow any of the uses listed in the zoning district without further review for compliance with the TPR. Typically, plan amendments and zone changes do not prevent an applicant (or subsequent property owners) from pursuing more intense development than is contemplated in the original application.

As explained below, an applicant or local government can modify or limit the proposed plan or zone change to reduce its traffic generating impacts and possibly avoid triggering a significant effect. Where the application or approval is limited to specific uses or a particular level of traffic generation, it is possible to limit the scope of the analysis. In many situations this is adequate to avoid triggering a significant effect.

*Source: ODOT Transportation Planning Rule FAQs*

Accordingly, in lieu of further analysis to assess whether the increased potential for trips could result in a significant impact, as allowed within the OAR 660-012-0060(2)(a) and (d) through adoption of measures that demonstrate the allowed land uses are consistent with the performance standards of the transportation facility or other measures as a condition of development including, but not limited to transportation system management measures...”.

ODOT’s Transportation Planning Rule FAQ sheet identifies four measures that could be applied through this section to avoid the finding of a significant impact:

- Adding planned transportation facilities or improvements;
- Limiting allowed land uses to fit available facilities;
- Changing the transportation performance standards to accept lower performance; or
- Adopting measures that reduce auto travel.

**Can local governments avoid triggering a significant effect by limiting the uses allowed by a proposed plan amendment or zone change?**

Yes. In practice, applicants or local governments have done this by calculating either the capacity of the planned transportation system or the intensity of use allowed by existing plans and zoning, and then including zoning restrictions that cap allowed development to avoid a "significant effect". This can be done by adopting trip caps or limits on the allowed uses. Currently, thoughtful applicants, with assistance from their traffic consultants, will carefully calculate the capacity of the planned transportation system and adjust their plan amendment proposal to fit within the available the capacity. This may include proposing roadway improvements or other measures to make the proposal fit the available capacity.

*Source: ODOT Transportation Planning Rule FAQs*

It is proposed that the site be rezoned with a limitation on the development (trip cap) of 599 weekday daily trips and 78 weekday p.m. peak hour trips, limiting the trip generation potential of the property to what could otherwise be developed within the existing zoning. Any development that remains within this trip cap will not create a significant impact on the transportation system. Note that further traffic analysis will still be required for site entitlements purposes (to demonstrate the actual system capacity).

## TRANSPORTATION PLANNING RULE COMPLIANCE

OAR Section 660-012-0060 of the Transportation Planning Rule (TPR) sets forth the relative criteria for evaluating plan and land use regulation amendments. Table 7 summarizes the criteria in Section 660-012-0060 and the applicability to the proposed rezone application.

**Table 7. Summary of Criteria in OAR 660-012-0060**

Section	Criteria	Applicable?
1	Describes how to determine if a proposed land use action results in a significant impact.	Yes, see response below
2	Describes measures for complying with Criterion #1 where a significant impact is determined.	Yes, see response below
3	Describes measures for complying with Criteria #1 and #2 without assuring that the allowed land uses are consistent with the function, capacity and performance standards of the facility.	No
4	Determinations under Criteria #1, #2, and #3 are coordinated with other local agencies.	Yes
5	Indicates that the presence of a transportation facility shall not be the basis for an exception to allow development on rural lands.	No
6	Indicates that local agencies should credit developments that provide a reduction in trips.	No
7	Outlines requirements for a local street plan, access management plan, or future street plan.	No
8	Defines a mixed-use, pedestrian-friendly neighborhood.	No
9	Outlines requirements under which a local government may find that an amendment to a zoning map does not significantly affect an existing and planned transportation facility.	No
10	Outlines requirements under which a local government may amend a plan without applying performance standards related to motor vehicle traffic congestion, delay or travel time.	No
11	Outlines requirements under which a local government may approve an amendment with partial mitigation.	No

As noted in Table 7, there are eleven criteria that apply to Plan and Land Use Regulation Amendments. Of these, Criteria #1 and #4 are applicable to the proposed land use action. These criteria are provided below in italics with responses shown in standard font.



*OAR 660-012-0060 (1) If an amendment to a functional plan, an acknowledged comprehensive plan, or a land use regulation (including a zoning map) would significantly affect an existing or planned transportation facility, then the local government must put in place measures as provided in section (2) of this rule, unless the amendment is allowed under section (3), (9) or (10) of this rule. A plan or land use regulation amendment significantly affects a transportation facility if it would:*

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

**Response:** With the proposed trip cap limiting the development density to what could otherwise be generated within the existing M-1 zoning no change occurs.

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

**Response:** The proposed rezone does not seek to change the standards of the City's functional classification system. The City's functional classification system is typically based on weekday daily trips, and as the trip cap limits the site's weekday daily trips and weekday p.m. peak hour trips no changes will occur.

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

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

**Response:** With the proposed trip cap the types of travel and access will remain unchanged on the surrounding streets.

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

**Response:** With no change in trips enforced through the trip cap there will be no degradation of the performance of existing or planned transportation facilities.

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

**Response:** With no change in trips enforced through the trip cap there will be no degradation of the performance of existing or planned transportation facilities.

*OAR 660-12-0060(4) Determinations under sections (1)–(3) of this rule shall be coordinated with affected transportation facility and service providers and other affected local governments.*

**Response:** The City of Prineville coordinates land use applications with affected agencies (Crook County and ODOT). It is understood that this land use application will be provided to other agencies (as appropriate) for their review and comment.

## FINDINGS AND RECOMMENDATIONS

Key findings of this Transportation Planning Rule analysis include the following:

- The 2.0-acre site is currently zoned M-1 allowing a range of light industrial uses. The application proposes to change the zoning to C-2, allowing integration of this site with the adjacent Grocery Bandit to support its operations and possibly add storage or other uses on the remainder of the property.
- Review of outright allowable uses in the M-1 and C-2 zoning shows that the rezone could allow retail uses that generate more trips than those allowed within the existing industrial zoning.
- To avoid finding of a significant impact, the proposed application includes a trip cap of 599 weekday daily trips and 78 weekday p.m. peak hour trips. Development within the parcel below these levels will avoid impacts to the required planning assumptions, functional classification system, and surrounding improvement projects within the City (and State) TSP.
- For future enforcement of this condition, future development plans within the two-acre property will require compliance materials documenting that the application remains compliant with the rezone.

Please note that this rezone analysis only supports the modification of the zoning through comparative reasonable build-out scenarios, showing that there are no needed changes to long-range transportation plans at this step in the process. Further transportation materials will be required to support any future development per the City's requirements. These materials will be provided under separate cover when (and if) a specific development plan for the property is known.

I can be reached if there are any questions on this analysis at (503) 997-4473 or via email at [joe@transightconsulting.com](mailto:joe@transightconsulting.com).

Prineville Comprehensive Plan

- AIRPORT
- CORE COMMERCIAL
- HEAVY INDUSTRIAL
- LIGHT INDUSTRIAL
- MIXED USE
- OPEN SPACE
- OUTLYING COMMERCIAL
- RESIDENTIAL



**1**  
A4.0  
**EXISTING DESIGNATION**  
SCALE: NOT TO SCALE  
MAP LOT 14-15-36A0-02501: HEAVY INDUSTRIAL



**2**  
A4.0  
**PROPOSED DESIGNATION**  
SCALE: NOT TO SCALE  
MAP LOT 14-15-36A0-02501: OUTLYING COMMERCIAL

**LUA**  
CONSULTING

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**TAX LOT 14-15-36A0-02501**  
**GROCERY BANDIT - CMA & RZ**

**DIXIE LAND COMPANY**  
PO BOX 72, HALSEY, OR 97348

PROJECT: GROCERY DEALS - CMA & RZ  
MODEL FILE:  
GROCERY-DEALS-A1.0  
DRAWN BY: JDC DATE: 11-3-25

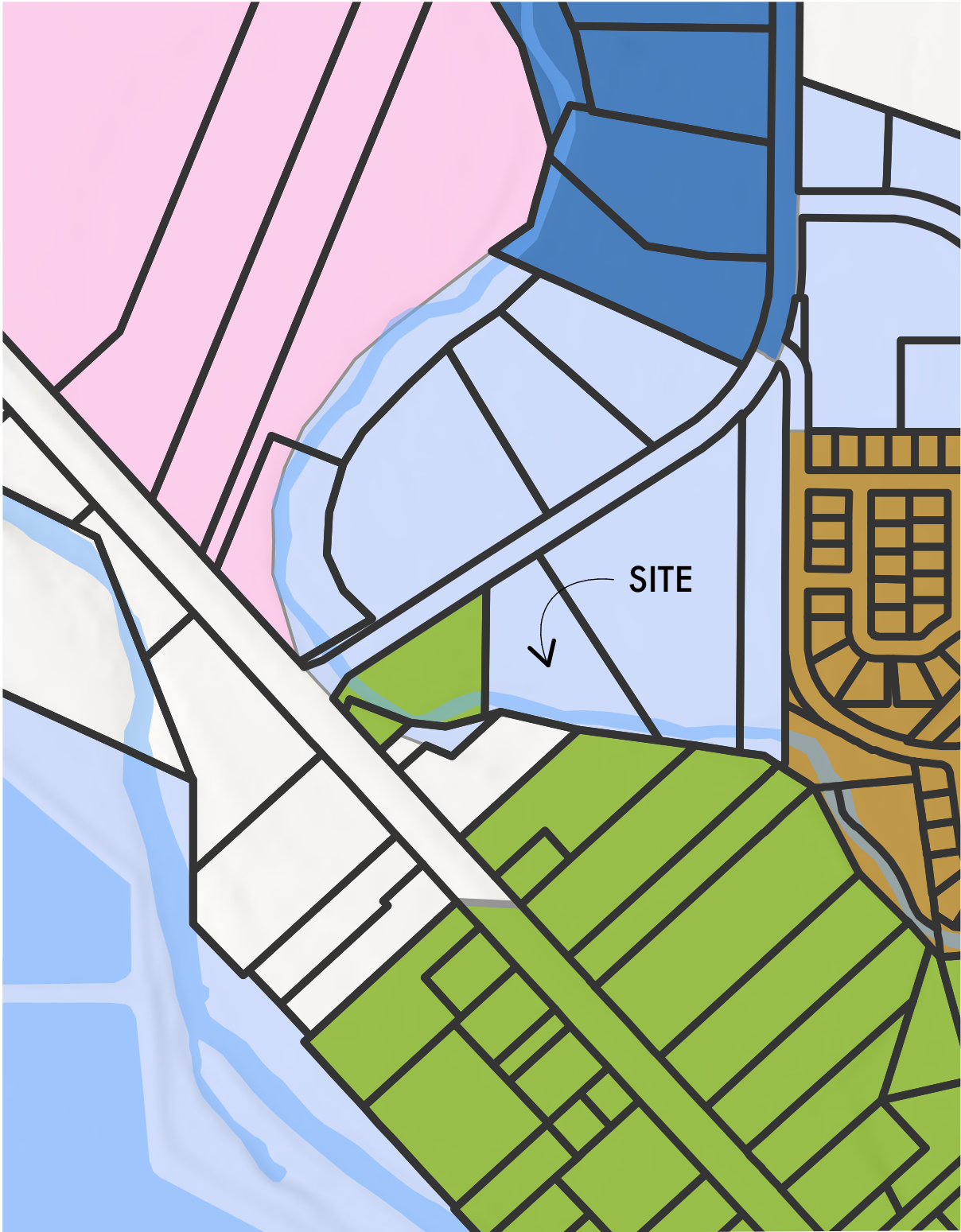
SHEET TITLE  
**CMA & RZ**  
**DESIG. MAP**

**A4.0**

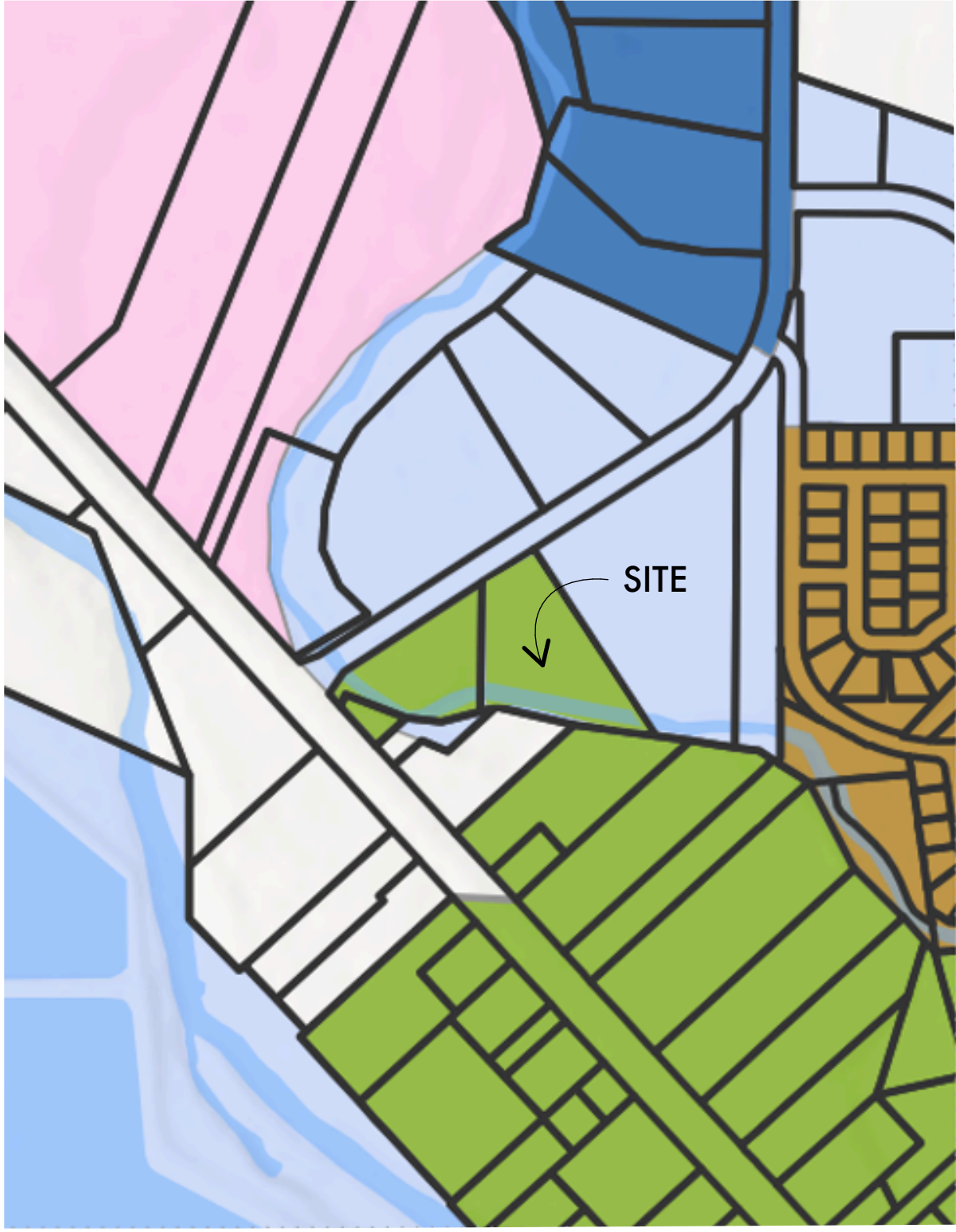


City Zones

- AC
- AD
- AM
- AO
- C1
- C2
- C3
- C4
- C5
- CMU
- IP
- M1
- M2
- PR
- R1
- R2
- R4



**1**  
A3.0  
**EXISTING ZONING**  
SCALE: NOT TO SCALE  
MAP LOT 14-15-36A0-02501: M-1 LIGHT INDUSTRIAL



**2**  
A3.0  
**PROPOSED ZONING**  
SCALE: NOT TO SCALE  
MAP LOT 14-15-36A0-02501: C-2 GENERAL COMMERCIAL

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SHEET TITLE  
CMA & RZ  
ZONING MAP

A3.0