



October 17, 2023

To: Corvallis Planning Commission

From: League of Women Voters of Corvallis Board of Directors

Re: Recommend Denial of Creekside Center Development (PLD-2022-03/CDP-2022-06/SUB-2022-03)

The League of Women Voters of Corvallis supports management of water for the benefit of the public and as sustainable habitat for all life forms, as well as conservation and management of ground and surface water and the improvement of water quality.

The Dunawi watershed, including its riverine corridor and associated wetlands, is one of the City watersheds that helps control the water quality of the Willamette River, into which its water ultimately flows. Intact watersheds help reduce downstream flooding, filter pollutants, and provide habitat for wildlife. Any one of these functions can help lower costly water treatment and flood control infrastructure.

Twelve years ago, the League of Women Voters of Corvallis appealed to LUBA a decision of the Corvallis City Council to allow a development at the same location as the proposed Creekside Center Development because it threatened the integrity of the Highly Protected Riparian Corridor and Locally Protected, Locally Significant Wetland proximate to Dunawi Creek. We believe that parts of the current Creekside Center proposal may pose the same danger. Though staff has listed many issues that must be addressed in order for the proposal to comply with LDC requirements, our testimony will focus only on water and the wetland.

Our reason for concern comes from a number of findings in the staff report. Here are just a few examples:

- LDC 4.0.70 Public Utility Requirements (*finding 101 p.23*) “The applicant shows facilities encroaching into the protected natural features areas. This may be allowed by MADA but must be justified.”
- LDC 4.0.130 Stormwater Management (*finding 117 p.26*) “...The City has concerns with a fueling station storm drainage running to a public facility prior to treatment. ...”
- LDC 4.5.90.05 Use of Minimum Assured Development Area (MADA) Provisions in the 100-year Floodway Fringe (*finding 138 p.30*) “The Dunawi Creek Post Development Floodplain Map in the Dunawi Creek Flood Risk Assessment does not show detailed site improvements. It is therefore not possible to evaluate whether it accurately reflects the proposed development.”
- LDC 4.13.50.b Riparian Corridor and Wetland Areas (*finding 186 p.37*) “...More information is needed to make positive findings on these code sections. ...”

- LDC 4.11.50.02 Calculation of the Base Minimum Assured Development Area (MADA) (*finding 173 p.35*) “The applicant proposes more development in MUCS zone than MADA allows. ...”

In addition to Land Development Code requirements, Comprehensive Plan Policies also apply. Policy 3.2.3 (*p.39*) states, “The City shall address compatibility conflicts through design and other transitional elements, as well as landscaping, building separation and buffering.” The applicant’s proposal includes a fueling station adjacent to housing and a playground. These uses are certainly not compatible.

The League of Women Voters of Corvallis agrees with the staff’s recommendation to deny this application, and we hope that the developer will be encouraged to come back with a plan more suitable to this difficult site.