

IN THE BOARD OF COUNTY COMMISSIONERS, LANE COUNTY, OREGON

**ORDINANCE NO. PA 1227 IN THE MATTER OF AMENDING THE JUNCTION CITY COMPREHENSIVE PLAN TO ADOPT EXCEPTIONS TO STATEWIDE PLANNING GOALS 3 AND 14 PURSUANT TO GOAL 2 AND MODIFY THE URBAN GROWTH BOUNDARY TO INCLUDE AN ADDITIONAL 74.26 ACRES OF LAND CURRENTLY WITHIN THE CITY LIMITS; AND ADOPTING A SEVERABILITY CLAUSE. (FILE NO. PA05-5132, Country Coach, Inc.)**

**WHEREAS**, the Board of County Commissioners of Lane County, through enactment of Ordinance No. PA 866 and PA 1053, has adopted policies and provisions of the Junction City Comprehensive Plan as an element of the Comprehensive Plan for Lane County; and

**WHEREAS**, land inside the city limits are within the jurisdiction of the City of Junction City, but the location of the Urban Growth Boundary within the City limits are subject to County approval pursuant to ORS 195.025 (1); and

**WHEREAS**, in response to application by Country Coach, Inc., the City of Junction City adopted amendments to the Junction City Comprehensive Plan to expand the Urban Growth Boundary which included conditions of approval to mitigate impacts to the transportation system; and

**WHEREAS**, the applicant and City of Junction City have requested Lane County action in co-adopting the amendment to achieve city-county coordination of land use planning; and

**WHEREAS**, the Lane County Planning Commission conducted a public hearing on June 15, 2004 and provide a recommendation on the proposed amendments; and

**WHEREAS**, evidence exists within the record indicating that the proposal meets the requirements of Lane Code Chapter 12 and the requirements of applicable state and local law and;

**WHEREAS**, the Board of County Commissioners has conducted public hearings and is now ready to take action;

**NOW, THEREFORE**, the Board of County Commissioners of Lane County Ordains as follows:

**Section 1.** The Junction City Comprehensive Plan is amended by modification of the Junction City Urban Growth Boundary and the addition of 74.26 acres of land, described as a portion of tax lot 100, Map 16 04 05, to the Junction City

Ordinance No. PA 1227 In the Matter of Amending the Junction City Comprehensive Plan to Adopt Exceptions to Statewide Planning Goals 3 and 14 Pursuant to Goal 2 and Modify the Urban Growth Boundary to Include an Additional 74.26 Acres of Land Currently Within the City Limits; and Adopting a Severability Clause (File No. PA 05-5132, Country Coach, Inc.)

Urban Growth Area, such territory being further identified on the Junction City Plan Map, Lane County Assessor Map 16-04-05 and the Lane County Rural Comprehensive Plan Official Plan Map Plot #280, all identified as Exhibit "A" attached and incorporated herein.

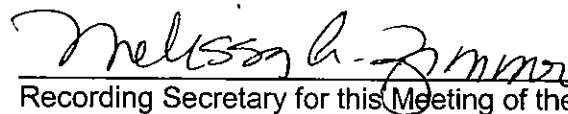
**Section 2.** An exception pursuant to Statewide Planning Goal 3 and the Goal 14 factors for the action described in Section 1 of this Ordinance, taken in accordance with the requirements of ORS 197.732, Statewide Planning Goal 2, and the applicable Oregon Administrative Rule requirements and set forth in pages 2-13 and 26-34 of the findings of fact and conclusions of law in Exhibit B attached and incorporated herein is hereby adopted as part of the Junction City Comprehensive Plan.

**Section 3.** If any section, subsection, sentence, clause, phrase or portion of this Ordinance is for any reason held invalid or unconstitutional by any court of competent jurisdiction, such portion shall be deemed a separate, distinct and independent provision, and such holding shall not affect the validity of the remaining portions hereof.

**FURTHER,** although not part of this Ordinance except as described above, the Board of County Commissioners adopts the Findings attached as Exhibit "B" in support of this decision.

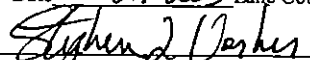
ENACTED this 11<sup>th</sup> day of January 2005.

  
\_\_\_\_\_  
Chair, Lane County Board of County Commissioners

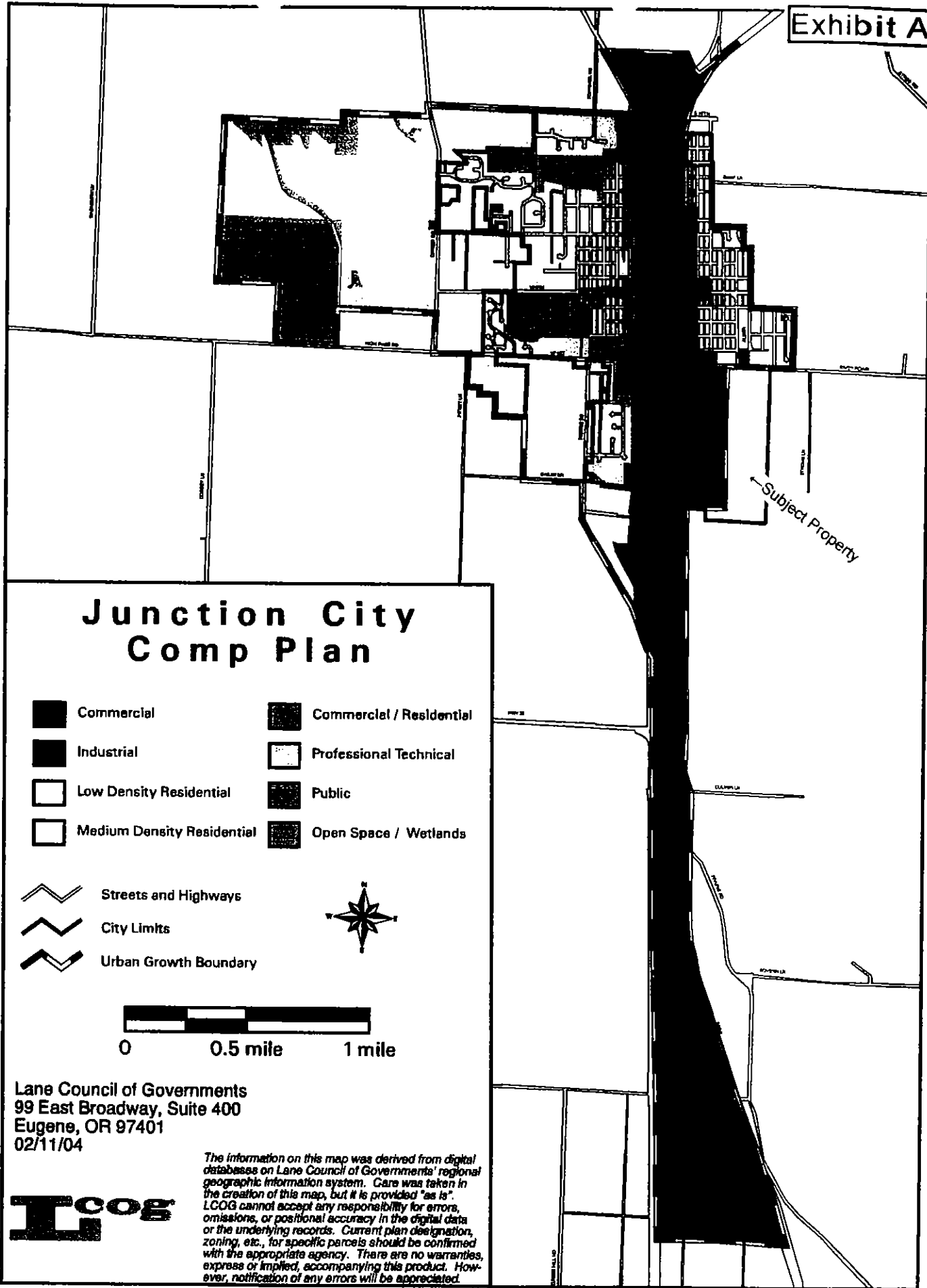
  
\_\_\_\_\_  
Recording Secretary for this Meeting of the Board

APPROVED AS TO FORM









Date 11-29-2005 Lane County




  
\_\_\_\_\_  
OFFICE OF LEGAL COUNSEL

Ordinance No. PA 1227 In the Matter of Amending the Junction City Comprehensive Plan to Adopt Exceptions to Statewide Planning Goals 3 and 14 Pursuant to Goal 2 and Modify the Urban Growth Boundary to Include an Additional 74.26 Acres of Land Currently Within the City Limits; and Adopting a Severability Clause (File No. PA 05-5132, Country Coach, Inc.)



# Junction City Comp Plan

- |  |  |
|--|--|
|  Commercial                 |  Commercial / Residential |
|  Industrial                 |  Professional Technical   |
|  Low Density Residential    |  Public                   |
|  Medium Density Residential |  Open Space / Wetlands    |

-  Streets and Highways
-  City Limits
-  Urban Growth Boundary



Lane Council of Governments  
 99 East Broadway, Suite 400  
 Eugene, OR 97401  
 02/11/04



*The information on this map was derived from digital databases on Lane Council of Governments' regional geographic information system. Care was taken in the creation of this map, but it is provided "as is". LCOG cannot accept any responsibility for errors, omissions, or positional accuracy in the digital data or the underlying records. Current plan designation, zoning, etc., for specific parcels should be confirmed with the appropriate agency. There are no warranties, express or implied, accompanying this product. However, notification of any errors will be appreciated.*

# EXHIBIT A

SECTION 5 T.16S.R.4W.W.M.  
LANE COUNTY

SCALE 1" = 400'

THIS MAP REPLACES 16 04 05 LINEN

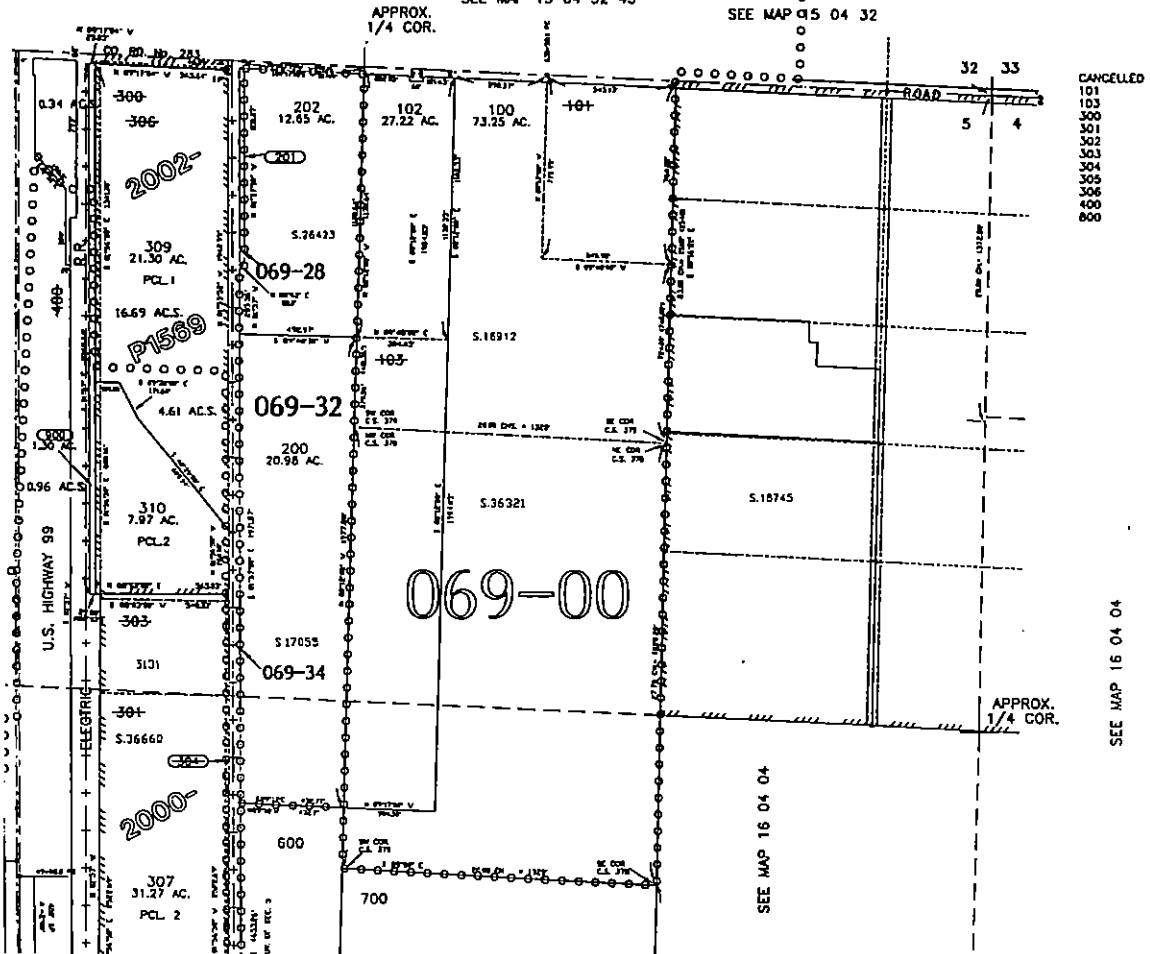
DATE	REVISION	BY

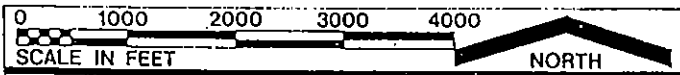
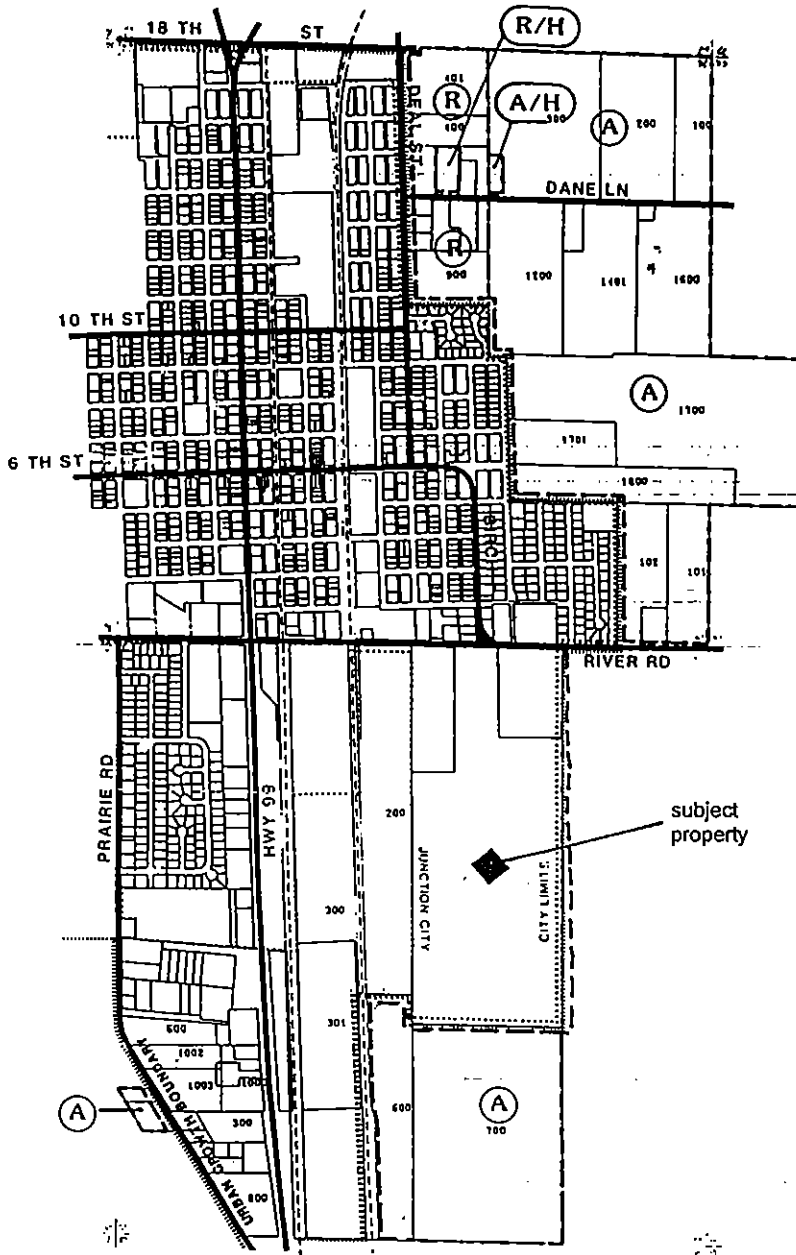
16 04 05  
& INDEX  
NAD 83/91

SEE MAP 15 04 32 34

SEE MAP 15 04 32 43

SEE MAP 15 04 32





lane county



OFFICIAL PLAN MAP

PLOT# 280

Township Range Section

15 04 32

16 04 05

ORIGINAL ORD. # PA 884 DATE 2/29/1984 FILE #

REVISION # 1 ORD. # PA 1053 DATE 01 / 12 / 94 FILE #

**Ordinance No. PA 1227  
Supplemental Findings of Fact  
(Revised)**

The Lane County Rural Comprehensive Plan Amendment Process is also found in Lane Code 16.400. As noted in the Findings of Fact, under Lane Code 12.005, the Board may amend or supplement the comprehensive plan upon a finding of change in public need based on a reevaluation of factors affecting the plan. Lane Code 16.400(6)(h) provides for similar criteria. Specifically, Lane Code 16.400(6)(h)(iii) provides the following criteria with respect to Major Amendments:

*(iii) The Board may amend or supplement the Rural Comprehensive Plan upon making the following findings:*

*(aa) For Major and Minor Amendments as defined in LC 16.400(8)(a) below, the Plan component or amendment meets all applicable requirements of local and state law, including Statewide Planning Goals and Oregon Administrative Rules.*

*(bb) For Major and Minor Amendments as defined in LC 16.400(8)(a) below, the Plan amendment or component is:*

*(i-i) necessary to correct an identified error in the application of the Plan; or*

*(ii-ii) necessary to fulfill an identified public or community need for the intended result of the component or amendment; or*

*(iii-iii) necessary to comply with the mandate of local, state or federal policy or law; or*

*(iv-iv) necessary to provide for the implementation of adopted Plan policy or elements; or*

*(v-v) otherwise deemed by the Board, for reasons briefly set forth in its decision, to be desirable, appropriate or proper.*

The subject expansion property is wholly within the incorporated city limits of the City of Junction City. Accordingly, the property is not subject to any county Comprehensive Plan use designation. Nevertheless, the property is outside the city’s Urban Growth Boundary (UGB) and that boundary is part of the county’s Comprehensive Plan. Junction City’s amendment of the UGB to include the subject expansion property requires co-adoption of the amendment by the county and an amendment of the Rural Comprehensive Plan. The amendment is a “Major Amendment” pursuant to Lane Code 16.400(8) because it requires a Statewide Planning Goal exception and the exception is not solely on the basis that the resource land is already built upon or is irrevocably committed to other uses not allowed by an applicable goal.

*(aa) For Major and Minor Amendments as defined in LC 16.400(8)(a) below, the Plan component or amendment meets all applicable requirements of local and state law, including Statewide Planning Goals and Oregon Administrative Rules.*

Finding: The UGB amendment is consistent with all applicable requirements of local and state law, including Statewide Planning Goals and Oregon Administrative Rules for the reasons stated and the findings made in the Findings of Fact. The Findings of Fact are incorporated herein by reference in response to the above criterion.

*(bb) For Major and Minor Amendments as defined in LC 16.400(8)(a) below, the Plan amendment or component is:*

*(iv-iv) necessary to provide for the implementation of adopted Plan policy or elements; or*

Finding: The request for expansion of the Junction City UGB is based on an economic development need for industrial land to serve the expansion of an existing company in the city. The change in public need from agricultural land to industrial land is based on a reevaluation of economic, environmental, social and energy factors affecting the plan. The City of Junction City employment base greatly benefits from the Recreational Vehicle manufacturing business with the variety and wage level of good jobs provided. Country Coach, Inc. presents a need for an additional 74 acres of land to expand their facility on the subject property, increasing the employment opportunities in this sector.

*(v-v) otherwise deemed by the Board, for reasons briefly set forth in its decision, to be desirable, appropriate or proper.*

Finding: Based on the findings and reasons already set out in the Findings of Fact, the Board further finds that it is desirable, appropriate and proper for Lane County to amend its Comprehensive Plan to co-adopt with Junction City the expansion of the Junction City UGB so as to allow one of the largest employers in Lane County the opportunity to continue to grow and expand in the community on land adjacent to its factory campus.

---

## **COMPREHENSIVE PLAN CONSISTENCY**

Although Lane Code 16.400(6)(h)(iii) does not require the findings below, we nevertheless make the following findings regarding consistency with the county's Comprehensive Plan and the General Plan Policies in response to comments submitted by 1000 Friends of Oregon.

Finding: The first finding in the Findings of Fact shows that the UGB amendment is consistent with and does not impair the purpose of the plan as established by Lane Code 12.005.

## **GOAL ONE: CITIZEN INVOLVEMENT**

**Finding:** We find that the notices and hearings provided and the procedures followed in connection with the processing and consideration of the subject application are consistent with the applicable Lane County Comprehensive Plan Goal One policies for the reasons stated in our findings adopted in response to Statewide Goal 1.

## **GOAL TWO: LAND USE PLANNING**

Of the policies set out in this section, the applicable policy is Policy 9 which provides:

*Exceptions to LCDC Goals (i.e., a determination that it is not possible to apply an appropriate goal to a specific property) shall be in accordance with OAR 660-04-000 (Goal 2 Exception Process) and shall only be taken at times of Plan adoption or amendment.*

**Finding:** The exception required for the UGB expansion was taken in accordance with the Goal 2 Exception Process as more specifically described in the Findings of Fact.

## **GOAL THREE: AGRICULTURAL LANDS**

**Finding:** The county's Agricultural Lands Policies are intended to encourage agricultural activities and to conserve and protect farmland consistent with state law. The policies provide direction in comprehensive planning related to agricultural zoning designations and implementing regulations pertaining to the protection of designated farm land. However, the policies also recognize that rural agricultural land may be converted to urban or urbanizable land as long as the process and criteria set forth in the Statewide Goals and LCDC regulations are followed.

Policy 11 provides:

*"Conversion of rural agricultural land to urbanizable land shall follow the process and criteria set forth in LCDC Goal 3."*

**Finding:** We find that the reference to "Goal 3" in the stated policy is a scrivener's error and we interpret that reference as a reference to Goal 2 since it is Goal 2 and the LCDC administrative rules implementing Goal 2 that set out the process and criteria for converting agricultural land to urbanizable land. We also find that the expansion of the city's UGB to allow an urban use of the subject farmland is consistent with the criteria set out in Statewide Goals 2, 3 and 14 and the applicable LCDC regulations pertaining to the expansion of an urban growth boundary and taking an exception to Goal 3. The findings of goal consistency and compliance with the applicable regulations are set out in the Findings of Fact, which are incorporated herein by reference in response to the stated policy. The UGB expansion is also consistent with Agricultural Lands Policy 8 because the city's approval conditions include the requirement of buffer areas along those portions of the expansion property that abut farmland.

#### **GOAL FOUR: FOREST LANDS**

Finding: We find that the Lane County Comprehensive Plan Goal Four policies are not applicable for the reasons stated in our findings adopted in response to Statewide Goal 4.

#### **GOAL FIVE: OPEN SPACE, SCENIC AND HISTORIC AREAS AND NATURAL RESOURCES**

Finding: We find that the UGB expansion is consistent with the Lane County Comprehensive Plan Goal Five policies for the reasons stated in our findings adopted in response to Statewide Goal 5.

#### **GOAL SIX: AIR, WATER AND LAND RESOURCES**

Finding: We find that the UGB expansion is consistent with the applicable Lane County Comprehensive Plan Goal Six policies for the reasons stated in our findings adopted in response to Statewide Goal 6. With respect to the Air Quality policies specifically, the applicable policies and our findings in response to those policies are:

1. *The County shall support programs which reduce air pollution primarily through continued active participation in Lane Regional Air Pollution Authority (LRAPA).*
2. *The County shall encourage practices and developments which can meet air quality standards.*

Finding: The UGB expansion is consistent with Air Quality Policies 1. and 2. Any manufacturing operations or uses on the subject property that cause air discharges that are regulated by applicable law will require a permit from LRAPA. We also adopt as findings in response these policies the statements set out in Jim Johnson's letter to Sandra Belson dated June 7, 2005.

#### **GOAL SEVEN: AREAS SUBJECT TO NATURAL DISASTERS AND HAZARDS**

Finding: We find that the UGB expansion is consistent with the applicable Lane County Comprehensive Plan Goal Seven policies for the reasons stated in our findings adopted in response to Statewide Goal 7.

## **GOAL EIGHT: RECREATION NEEDS**

Finding: The Lane County Comprehensive Plan Goal Eight policies are not applicable for the reasons stated in our findings adopted in response to Statewide Goal 8.

## **GOAL NINE: ECONOMY OF THE STATE**

The applicable Goal Nine Policies are set out below, and each quoted policy is followed by a finding in response thereto:

*1. Within the framework of these policies, the County shall encourage the diversification and growth of the local economy. Primary efforts will be in the following areas:*

*a. Cooperation and participation with efforts and programs established by public agencies and private concerns to promote and enhance economic development throughout the County.*

*b. Recognition of the value of local resources such as timber and agricultural lands as the primary source of raw materials for the manufacturing and processing sectors of the economy.*

*c. Establishment of land use policies that provide a supportive environment for industrial and commercial activities.*

Finding: The UGB expansion is entirely consistent with Policy 1. It provides needed industrial land that will allow one of the largest employers in Lane County to continue to grow and expand its facilities on property adjacent to its current factory campus.

*2. The County's primary responsibility in economic development shall be to ensure the necessary land area is available throughout the County and appropriate levels of service can be obtained, consistent with the needs of industry and commerce, the area and other County policy.*

Finding: The UGB expansion is consistent with this policy as it provides land necessary for economic development that is consistent with the needs of an existing well established industry within the community. The appropriate levels of services needed by Country Coach can be provided by the city.

*3. Most industrial and commercial development shall be concentrated within the urban growth boundaries of the various cities throughout the County. The County shall work closely with city governments to improve economic conditions within their areas. During County review and adoption of city plans, particular attention shall be given to the identification and protection of industrial and commercial sites, both large and small scale.*

Finding: The expansion of the UGB is consistent with this policy because it allows industrial development to occur within the Junction City UGB.

5. *Existing parcels of land within UGBs which are suitable for large-scale industrial development shall be protected through the County's review and acknowledgement of city plans.*

Finding: As was already explained in the Findings of Fact, unless the UGB is expanded to incorporate the subject property, there is not a parcel of land within the city's UGB that is suitable for the applicant's large-scale industrial development. The UGB expansion is therefore consistent with this policy.

6. *The County shall work closely with incorporated city governments to improve local economic conditions, including land and service provisions.*

Finding: This policy is satisfied though the county's co-adoption of the city's UGB amendment that the city's City Council has unanimously determined will help the economy of Junction City.

7. *New industrial development shall normally take place within adopted Urban Growth Boundaries, unless such development:*

a. *Is clearly rural oriented (e.g., canneries, logging operations, processing of resource material);*

b. *Is necessary for the continuation of existing industrial operations, including plan or site expansion;*

c. *Will be located in an area either built upon or committed to nonresource use where necessary services can be provided;*

d. *The industrial activity is dependent on a unique site-specific resource;*

e. *The use is too hazardous or is incompatible in densely populated areas;*

f. *The industrial activity creates by-products which are used to a significant level in resource activities in the immediate area; or*

g. *Where a significant comparative advantage could be gained in locating in a rural area. Any development approved under this policy that requires a plan amendment shall be justified by an exception to applicable Statewide Planning Goals.*

Finding: The UGB amendment is consistent with these policies because it will allow the industrial development related to Country Coach's expansion to occur within the UGB.

Policies 8 through 12 are not applicable.

## **GOAL TEN: HOUSING**

To the extent the policies are even applicable; we find that the UGB expansion is consistent with the Lane County Comprehensive Plan Goal Ten policies for the reasons stated in our findings adopted in response to Statewide Goal 10.

## **GOAL ELEVEN: PUBLIC FACILITIES AND SERVICES.**

Finding: The Goal Eleven Policies are not applicable. The Goal Eleven Policies principally set out the policies for the level of public facilities and services to be provided to the various land designations in the Rural Comprehensive Plan. The subject property is neither designated nor zoned pursuant to the Rural Comprehensive Plan because the property is wholly within the incorporated limits of the City of Junction City. The full range of urban services necessary for the development of the subject property for an urban industrial use will be provided by the city and such services are available or will be made available at the time the property is developed. See also Goal 14, Policy 6. Transportation facilities are also adequate and do not need to be expanded because of the traffic mitigation approval conditions that make the application consistent with the State Transportation Planning Rule.

## **GOAL TWELVE: TRANSPORTATION**

Finding: We find that the UGB expansion is consistent with the applicable Lane County Comprehensive Plan Goal Twelve policies for the reasons stated in our findings adopted in response to Statewide Goal 12.

## **GOAL THIRTEEN: ENERGY CONSERVATION**

Finding: We find that the UGB expansion is consistent with the Lane County Comprehensive Plan Goal Thirteen policies for the reasons stated in our findings adopted in response to Statewide Goal 13.

## **GOAL FOURTEEN: URBANIZATION**

The applicable Goal Fourteen Policies are set out below, and each quoted policy is followed by a finding in response thereto:

- 1. The County shall encourage new residential, commercial and industrial development to locate within existing incorporated cities or rural communities. Any growth outside Urban Growth Boundaries must:
  - a. Be restricted to committed or developed areas including approved new development centers; or**

b. *Under certain specified conditions set forth in this plan, industrial, commercial and residential development is appropriate outside of developed and committed areas provided a valid exception is taken and/or all Statewide Goal requirements are met.*

c. *Any community designated in the plan that does not have an adequate Urban Growth Boundary, or any addition to such community that may be proposed, shall be justified by a valid exception pursuant to Statewide Goal 2, Part II.*

*This and subsequent policies do not apply to the Eugene-Springfield Metropolitan Area, which is governed by the Metro Area Plan.*

Finding: The UGB amendment is consistent with this policy because it allows Country Coach's industrial expansion to occur within the Junction City UGB. The proposed expansion site is already wholly within the incorporated city limits of the City of Junction City.

2. *The County shall provide for orderly and efficient transition from rural to urban land use while insuring the supply of housing, employment, livability and other amenities, in order to accommodate the long-range growth of each city.*

Finding: The UGB amendment is also consistent with this policy because it provides needed industrial land to accommodate the long-range growth of Junction City. There is also an efficient transition from rural to urban land because all necessary public services can be provided by the city and are available at the property. The required buffer zones between the expansion site and adjacent agricultural lands also help to provide an orderly and efficient transition from a rural to an urban land use.

3. *The County shall provide for a cooperative UGB management process between the County and cities in the County in the following:*

a. *The establishment and periodic revision of urban growth boundaries and the planning and implementation of common policies and procedures within the boundaries;*

b. *The planning and implementation of city policies for lands inside city boundaries which may affect the County.*

4. *The County shall continue to comply with the planning coordination requirements, and the "urban growth management program" requirements of the Oregon Land Conservation and Development Commission.*

5. *The County will seek agreement with each city to commonly determine the location of urban growth boundaries and the interim and long-term land use designations and public improvement project designations within the growth boundaries.*

Finding: The county's co-adoption of the UGB amendment and coordination with Junction City in connection with the amendment is consistent with Policies 3 through 5.

*6. Each city is regarded as the logical and ultimate provider of urban services within its urban growth boundaries; Lane County will not approve any development nor encourage or abet the establishment of urban services or facilities within the city's urban growth boundary, which are contrary to city policy or agreement excepting establishment service districts.*

Finding: The UGB amendment is consistent with this policy. The city will provide urban services to the property with the exception of any county roads within the city.

*7. It is the County's position that ultimate urban level density within a city's urban growth boundary should occur only where all essential public facilities and services (water, sewer, etc.) are or will be shortly available. Cities are encouraged and expected to prepare and publish facilities plans and schedules for all facilities.*

Finding: The UGB amendment is consistent with this policy. The expansion property is adjacent to Country Coach's existing campus. Service connections from systems currently serving the existing campus can be extended to the proposed expansion site. The full range of urban services appropriate for the subject property's proposed land use classification is available and can be provided in a timely, orderly and efficient manner consistent with the policy. This conclusion is based on consideration of the existing public service delivery systems and plans that are in place in the city that ensure the proper coordination of the types, locations and delivery of the public facilities and services necessary to support the existing and proposed urban land areas. We also incorporate here as additional findings our findings set out in response to Goal 11.

*8. The County will encourage the orderly and logical annexation of territory to each city.*

Finding: This policy is not applicable. The subject property is already wholly within the incorporated city limits of the City of Junction City.

*9. Any County approval of the division and/or development of land within a city's urban growth boundary will be consistent with provisions of the applicable city plan within the area. If necessary, the County may take one or more of the following actions to land outside the city's jurisdiction:*

*a. On an interim basis, limiting the level of development to less than the planned urban density or intensity, based on interim standards to be adopted and published.*

*b. Determining that the design and operation of an interim land use will allow for later conversion to full urban densities in an orderly and efficient manner (e.g., land divisions to be approved in such a way as to permit later*

*redivision into greater and urban level densities), and that the interim land use will not otherwise pre-empt the subject or other properties from the future orderly provision of urban services and facilities;*

*c. Requiring that interim and long term development be consistent with existing master sewer and/or water plans for the urban growth area;*

*d. Requiring city service connection, where agreeable to the city and consistent with applicable law, and where consistent with approved master facility plans for the urban growth area.*

*10. Lane County will apply where appropriate applicable city public improvement standards within urban growth boundaries where it is determined that those standards are more rigorous than those of the County. Where city standards are not practicable, County approvals will be given in such a way as to permit each conversion in the future to city standards.*

Finding: Policies 9. and 10. are not applicable. The subject property is already within the incorporated city limits and is therefore within the city's jurisdiction for approval of any division or development of the land.

*11. Use of utility easements and natural drainage ways within the urban growth area shall be consistent with applicable plans, will have multiple uses where practicable and will be based on County city agreement.*

Finding: This policy is not directly applicable because the subject property is already within the city's jurisdiction.

*12. The County will provide each city the opportunity to review and comment upon County consideration of plans, ordinances, development proposals (zoning and land division), public improvement projects, sale of County lands and other similar matters of city interest which occur within the city's area of influence and/or urban growth boundary, via "joint agreements for planning coordinator" executed with each city.*

Finding: This policy is not applicable to the subject application.

*13. Lane County will expect to review city proposals for, or consideration of, matters of County interest through established procedures. Matters to be reviewed may include those listed above in Policy No. 12, plus other matters such as annexations, as governed by joint agreement.*

Finding: This policy is satisfied. Lane County is being asked to co-adopt the city's ordinance expanding its UGB to include the subject property.

14. *Lane County shall attempt to achieve coordinated establishment of city urban growth boundaries and land use/public improvement approaches (including plan land use designations, development policies, zoning, etc.). Plan coordination may take one of the following forms:*

- a. *Co-adoption, with each city, of a common comprehensive plan; or*
- b. *Adoption of the city's comprehensive plan as a part of the County's plan(s); or*
- c. *Approval of any supplemental policies or procedures which will accomplish the intent of this section of the Policies, which may be mutually agreed upon by the County and each city.*

Finding: The county's co-adoption of the city's UGB amendment is consistent with this policy.

15. *Lane County shall regard itself as "caretaker" for lands within city UGBs but outside of city limits and will administer County land use and other regulations toward that objective, within the parameters established by the preceding Policies. Conflicts between city and County interpretations of plans or appropriate County actions shall be resolved temporarily in favor of County until the conflict is fully resolved through plan amendment or clarification, or other action.*

Finding: This policy is not applicable. The subject expansion site is within the incorporated city limits of the City of Junction City.

16. *Unincorporated communities shall be considered and treated as part of the County Plan with due consideration for community needs and values. Urban level development requiring or ultimately likely to require urban services such as sewer and water systems shall not be approved unless the community itself, by public or private installation, can supply these services, and the development is in the form of an acceptable new development center proposal.*

Finding: This policy is not applicable. Junction City is not an unincorporated community.

17. *Within established UGBs, city plans ratified or adopted by the County are to be considered the governing land use documents, but do not preempt final County legal responsibilities or authority. Contract annexation agreements between cities and the County may modify this position as acceptable to both parties.*

Finding: The expansion of the UGB is consistent with this policy. Co-adoption of by the county of the proposed UGB expansion follows this policy. The property is already within the incorporated city limits and no contract annexation agreement is applicable.

**GOAL FIFTEEN: WILLAMETTE RIVER GREENWAY**  
**GOAL SIXTEEN: ESTUARINE RESOURCES**  
**GOAL SEVENTEEN: COASTAL SHORELANDS**  
**GOAL EIGHTEEN: BEACHES AND DUNES**  
**GOAL NINETEEN: OCEAN RESOURCES**

Finding: None of the Lane County Rural Comprehensive Plan policies set out under Goal Fifteen through Goal Nineteen are applicable to the subject expansion property.

---

**ADDITIONAL FINDINGS:**

**Comparison of the social and economic consequences of retaining the proposed expansion site in a farm use against the social and economic consequences of conversion of that site to an urban light industrial use.**

We find that the subject 74.5 acre parcel in its current farm use yields a gross income of approximately \$45,000 per annum. We further find that the labor required to farm the land requires substantially less than one full-time equivalent employee. We also find that Country Coach's current industrial use on its existing campus, which is not as large as the subject parcel, generates the following social and economic impacts:

The company is the city's largest employer and one of Lane County's largest employers with over 1600 active full time employees. The company's payroll for 2004 exceeded \$43,000,000. The company's combined withholding taxes, unemployment taxes, Lane Transit District taxes, Oregon income tax and local property taxes totaled approximately \$4,547,000.

The company is also a major contributor to the economic vitality of the area because of its significant purchases of goods and services from local vendors. During 2004, the company's purchases from Junction City businesses exceeded \$10,000,000, and the company's purchases from Eugene area businesses exceeded \$40,000,000, thereby creating more jobs and investment and generating more tax revenue in the area than what is represented just by the company's direct payroll, taxes and investments. This effect is known as the "multiplier" effect. The "multiplier" effect is described in *Securing America's Future: The Case for a Strong Manufacturing Base*, a study prepared by Joel Popkin and Company, Washington, D.C. (June 2003) (the Popkin Study), as follows:

"The manufacturing sector is the heart of the innovation process not only because of its direct role in producing and commercializing innovations but also because its direct and substantial linkages to other sectors spread those impacts throughout the economy. These linkages work both backward to mining and other raw material producing sectors, and forward into the transportation and trade sectors that are delivering the goods to final consumers. Thus, as manufacturing output grows it requires more inputs, and in turn spurs the creation of jobs, investments,

and innovations in other sectors of the economy. This effect can be quantified in a number, referred to as a “multiplier,” that shows how much intermediate and final output is generated by a dollar's worth of final demand for manufactured products.”

As reported in the Popkin Study, the U.S. Commerce Department’s Bureau of Economic Analysis calculates multipliers for each major sector of the economy. The data released at the end of 2002 shows that the manufacturing “multiplier” is 2.43: \$1 in final demand for manufactured products and \$1.43 for intermediate products and services. Stated otherwise, to satisfy a dollar’s worth of final demand for manufactured products generates a demand of \$1.67 from manufacturing (some of it for final products and some from intermediate parts and components) and \$0.76 from other sectors of the economy. This is significantly higher than any other major sector of the economy. We find the Popkin Study and its conclusions set out above to be credible.

We further find with respect to the proposed expansion site that Country Coach’s capital investment in the new proposed manufacturing facility is projected to exceed \$15 million just for the first phase. We also find that projection to be reasonable. We also find that the company’s projection that it will be able to provide an additional 1700 jobs on the expansion property is a reasonable projection based on the company’s employment of nearly 1700 people on its existing campus.

We find based on the foregoing that the social and economic cost of converting the subject property from a farm use to an urban industrial use is far outweighed by the social and economic benefit of allowing Country Coach to expand its factory campus onto the UGB expansion site.

#### **Need for expansion site.**

In addition to our other findings regarding the need for the UGB expansion as proposed, we also find that Jay Howard’s letter of December 6, 2005 that summarizes the need for the expansion property and that accounts for allegedly underutilized portions of the current Country Coach campus is credible and we incorporate the statements in that letter as our findings in support of our decision to co-adopt the UGB amendment.

#### **Oaklea site.**

In addition to our other findings regarding the unsuitability of the Oaklea site to accommodate Country Coach’s proposed expansion, we also find that a zone change for the 80-acre Oaklea site from Professional/Technical to Light Industrial zoning would not be compatible with the land uses surrounding the Oaklea site and further find that the Oaklea site cannot possibly reasonably accommodate Country Coach’s proposed expansion.

Specifically, land that is planned and zoned for low density and medium density residential uses is located directly to the northwest, north, northeast, east and southeast of the Oaklea site. Also, the land to the west of the Oaklea site is publicly owned and planned for public park use.

Changing the zoning of the Oaklea site from Professional Technical to Light Industrial to accommodate a large motorcoach-manufacturing factory would be incompatible with the surrounding area where much of the city's future residential growth is planned to occur.

Given the location of the Oaklea site and the surrounding land uses, the site has been designated and zoned by the city for Professional/Technical uses. Section 63 of the city's zoning ordinance describes that zone and the purpose of it as follows:

The district is intended to designate those areas identified by the Comprehensive Plan text and map as suitable sites for accommodating large-scale concentrations of mixed office, high technology systems manufacturing, industrial park buildings, warehousing and laboratories. Development within the district may include mutually compatible uses which value a setting characterized as "park-like." The structures shall be limited to buildings housing offices, laboratories, high technology systems manufacturing, light industrial mixed-use buildings that do not generate offensive external impacts such as noise, pollution or substantial emissions, warehouses that conform to the park setting, and commercial activities directly serving occupants of these facilities.

Country Coach's proposed large scale manufacturing use is not compatible with and would not be permitted within that zone and a zone change to a light industrial use would not be consistent with the designation and zoning of the surrounding areas. Accordingly, the Oaklea site cannot reasonably accommodate Country Coach's proposed use.

Moreover, we find that the Oaklea site is located well over a mile from the existing Country Coach campus. Building a new factory at this remote location would result in the significant overhead redundancies and inefficiencies explained in Section 1.0 of Country Coach's Application, which we find would not allow Country Coach to remain competitive in its traded sector. In addition to those considerations, Country Coach would be required to move employees and materials (including 45 foot long chassis and laminated fiberglass parts that are 45' long and 9' tall) from the current factory campus to the remote Oaklea site location through the streets of Junction City, creating additional traffic congestion and pollution, and wasting energy.

We also find that a motor home manufacturing use on the Oaklea site would not be compatible with the existing and planned for uses on the surrounding areas that are designated and zoned for low density and medium density residential uses and public park uses. Unlike the Oaklea site, Country Coach's existing facility and the proposed expansion site are located in an industrial area of the city, adjacent to two rail lines, and surrounded principally by other industrial uses and commercial farmland (commercial farming is also an industry). Country Coach does not want to locate its new manufacturing facilities, and the city does not want those manufacturing facilities located next to an area planned, designated and zoned to accommodate most of the city's future residential growth. We agree with the city's findings and conclusions regarding the unsuitability of the Oaklea site for motorcoach manufacturing and in particular, the unsuitability of the Oaklea site for Country Coach's proposed expansion.

Finally, we find that sanitary sewer service is not currently available to the Oaklea site. A lift station and three-quarters of a mile of pipe would be required to provide service to the area. On the other hand, sanitary sewer service is readily available to the proposed expansion site by extension of the service from the existing adjacent factory campus.

For the reasons identified above, we find that the Oaklea site cannot possibly reasonably accommodate the proposed Country Coach expansion and motorcoach manufacturing use.

**Demonstrated need for the UGB expansion to accommodate long-range population growth requirements.**

We also find that there is a demonstrated need for the proposed UGB expansion to accommodate long-range population growth requirements consistent with the Statewide Goals. We find that the Lane Council of Governments (LCOG) assisted in the coordination of population projections for all member jurisdictions which include the City of Junction City and Lane County. The Lane County Coordinated Population Projections reflect a joint action by the LCOG Board and all member jurisdictions setting a common planning base for the region. We find that the projections adopted February 24, 2005 as part of the Lane County Coordinated Population Projections project includes the projection that from 2004 to 2025, the population of Junction City is projected to grow from 6,000 to 8,500, with an average annual growth rate of 1.5%. We also note that the city's Transportation System Plan projects an annual growth rate within the UGB of 1.9%, which is even greater than the annual growth rate projected in the Lane County Coordinated Population Projections. We further find that to accommodate the projected population growth, additional employment opportunities within the city are needed.

We find that as of December 21, 2005, Country Coach had 1686 employees and that based on employee zip codes, 297 of those employees are from Junction City or the immediate area around Junction City, which represents nearly 18% of the workforce at Country Coach. We further find that Country Coach reasonably projects that Country Coach will be able to provide an additional 1700 jobs on the expansion property. The reasonableness of that projection is based on current employment levels on the existing factory campus. We also find that although the percentage of Country Coach employees who reside in Junction City varies from time to time and may increase as additional housing becomes available within the city, based on the current workforce percentages, roughly 300 additional jobs will be provided to Junction City residents if the proposed expansion is approved. We find that those jobs are needed to accommodate the projected population growth in Junction City.

**Stormwater.**

We find that post-development stormwater flows can be adequately mitigated on site in compliance with applicable federal, state and local laws and regulations so as to avoid any adverse impact upon storm water drainage in the area and the City of Junction City. That finding is based in part on Ken Schaudt's (SS&W Engineers) letters dated May 16, 2005 and December 5, 2005 and City Administrator Mike Leighton's letter dated December 5, 2005. We find that the testimony in those letters is credible and in support of our reasoning and conclusions

regarding stormwater issues, we incorporate herein by reference as findings the statements contained in Mr. Schaudt's letters and Mr. Leighton's letter.

### **Air Quality.**

Our findings set out in response to (i) Statewide Goal 6; (ii) the Junction City Comprehensive Plan policies provided in Chapter 2, Environmental Element, Air Pollution, and (iii) the Lane County Comprehensive Plan Goal Six Air Quality policies are incorporated by reference and repeated here in response to the issues raised with respect to air quality by Jerry Szerlip, Lisa Arkin and Ed Becker.

We find that until after the UGB amendment to allow the expansion is finally approved, it is premature for the Country Coach to move forward with the type of planning and engineering necessary to determine what kinds of air emissions will be generated from the expansion property and the best way to control those emissions. We also find that methods, materials, available control technologies and regulations continue to change, and that an estimate of air emissions at this point may well not be accurate a year or two from now when the proposed new manufacturing plant is complete. We also find that because some of the expansion area will be used to provide land for future Country Coach expansion, predicting air emissions from future activities that may not occur for several years would be nothing more than a guess.

We further find that the necessary regulatory and permitting mechanisms to assure that the goal of maintaining and improving air quality is met are already in place in Lane County. Specifically, the Lane Regional Air Pollution Authority (LRAPA) regulates the Lane County airshed and the industries within it. Its permit system for emissions provides the regulatory measures that maintain the carrying capacity and quality of the airshed consistent with applicable state and federal environmental quality standards. Country Coach currently operates under a Title V Operating Permit issued by LRAPA. A copy of Country Coach's existing permit was submitted into the record on December 21, 2005. That permit, which spans 53 pages, permits and regulates emissions generated by (1) painting and coating of coaches, chassis and coach parts; (2) cabinet finishing; (3) fiberglass lamination; (4) miscellaneous volatile organic compounds (VOC) usage; (5) fiberglass finishing; (6) woodworking (particulate matter control); (7) welding and other Aggregate Insignificant Activities; and (8) roads and parking areas. That permit was issued pursuant to the applicable statutes, rules and regulations, and Country Coach must comply with the permit. When Country Coach expands its operations onto the proposed expansion site, it will be required to obtain a modification of its existing permit or a new permit to assure that its operations continue to comply with applicable state and federal air standards that are in place to protect the air quality.

On behalf of LRAPA, Jim Johnson submitted into the record a letter to City Planner Sandra Belson dated June 7, 2005 regarding air discharge issues. In his letter, Mr. Johnson makes clear that Country Coach is required to submit an application to increase emissions beyond those allowed in its current permit and that any increase in emissions will be evaluated using the applicable rules in effect at that time. Mr. Johnson also states that requests for emissions increases of the largest variety require that the facility submit a Prevention of Significant Deterioration (PSD) application and employ Best Available Control Technology (BACT). We

find Mr. Johnson's explanation to be credible and incorporate his statements as part of our findings.

We also find that Jerry Szerlip's letter and the accompanying laboratory report and opinion letter of Paul Engelking (collectively "the Szerlip documents") do not respond to applicable approval criteria. Moreover, we find that the Szerlip documents do not support the conclusion urged by Mr. Szerlip, nor do they reasonably support any other conclusion. We reject drawing any conclusions from the Szerlip documents. The reasons supporting our findings regarding the Szerlip documents are set out in Paul Vaughan's letter dated January 14, 2006, and we specifically incorporate by reference the reasons set out in that letter in support of the foregoing findings. We also reject as not supported by any credible evidence in the record any purported statement by an unnamed DEQ "specialist" to the effect that it is raining styrene in the area of Country Coach's existing factory campus for the reason that such statement appears to be based on the Szerlip documents and any such claim is inconsistent with the laboratory result showing no detectable level of styrene in one of the two soil samples procured by Mr. Szerlip for laboratory testing.