

The studies, after thorough discussion before the EDC in particular, have resulted in adoption of economic goals and policies intended to emphasize industrial development and expand the retail and service sectors of the economy. (Exhibit 3; Resolution 262, Veneta City Council, January 1982).

Because the unamended plan treated all industrial development under its Industrial-Commercial provisions and because the City has, through this proceeding, amended the Plan with new Light Industrial policies, it is necessary to amend the Industrial-Commercial text to reflect this change. The industrial-commercial lands goal shall not change and its new policies continue to reflect that district's purpose of providing adequate sites to respond to industrial and commercial development needs of the community.

The narrative must be amended to delete all references to Veneta placing little emphasis on industrial development. This is based upon the facts found by the City in support of adoption of Light Industrial policies in Part III D of these Findings. Those findings are expressly incorporated herein to support the changes in the Industrial-Commercial plan text.

The City concludes that it is necessary to amend the industrial-commercial text of the Plan as reflected in Exhibit 12. The amendment will ensure that the plan is internally consistent and adequately reflect the City's adoption of new Light Industrial policies.

4. Water System - pages 19 and 96:

The plan text and appendix note deficiencies in the Veneta Water System. The data base is updated both in the Veneta Water Facilities Plan, adopted as a technical addendum to the Plan (page 45) and in the Veneta Industrial Site Analysis (Exhibit 5).

The Tanglewood Park site is currently serviced by a 16" main (the largest in Veneta) which extends to the intersection of Territorial and Jeans Road west of the site, and a 10" main in Jeans Road adjacent to the site to the south. The applicant has designed a loop system through the site which will connect these two mains. (Testimony of Tom Poag, applicant's civil engineer, July 14, 1983).

Fireflows at Highway 126 and Territorial Road show available flows of 4,000 gpm. Approximately 3,000-4,000 gpm is needed for the proposed Tanglewood development. Water storage and pump station capacity (2.5 million gpd) are designed to service all existing and potential development within the urban services boundary including the Tanglewood property. See generally: Veneta Water Facilities Plan (1979); the City recently completed Phase I, Priority I improvements.

Any development of commercial or light industrial lands within Tanglewood will require an analysis of water main capacities and fireflows through the site review process as required by the zoning ordinance Section 5.330.

Because the new Water Facilities Plan is incorporated into the Plan (See Plan at 45) the City concludes there is a need to amend the Plan to ensure internal plan consistency. The data located at page 96 of the plan regarding the water system, together with the map at page 97 is updated in the Water Facilities Plan. To avoid inconsistency the information and map at pages 96-97 must be deleted from the plan and replaced with the narrative relating to the Veneta Water System found at pages 5-6 of the Industrial Site Analysis (Exhibit 5).

5. Commercial Narrative - Page 36:

Commercial plan provisions foresee the City of Veneta as a West Lane commercial service center. The goal and policies of that provision of the Plan are intended to enhance Veneta's role as such a center. (Plan at 36). Although the Tanglewood proposal is consistent with the general purposes of the commercial provisions of the Plan, the Central Business District language of the plan could be interpreted to preclude the proposed development. Because of this potential inconsistency the City finds it necessary to review economic data compiled since acknowledgement of the comprehensive plan, analyze that data with respect to types of action the City can undertake to adequately implement the comprehensive plan commercial policies, and make necessary changes in the text of the Commercial provisions of the plan to ensure that such policies can reasonably be implemented.

As discussed above, the comprehensive plan encourages Veneta to establish itself as a West Lane commercial service center. The Veneta Economic Analysis (Exhibit 2) indicates that retail sales in the Veneta area are estimated to be approximately \$6.6 million per year while total potential retail sales expenditures are \$28.6 million per year. This results in lost retail sales of approximately \$22 million per year. In other words, Veneta area residents purchase only 23 percent of their retail goods within the City's market area. (Exhibit 2 at 46-48). The study concludes that it is apparent that commercial opportunities exist for businesses in the Veneta area if such businesses can persuade residents to shop locally. The primary reason for lost retail trade is lack of shopping opportunities and lack of selection. The study suggests that in order to capture the lost retail and service industry trade, Veneta must provide more retail and service industry establishments offering a greater selection of goods and prices comparable to those in the Eugene metropolitan area. (Exhibit 2 at 53).

The Pacific Economica Study (LUBA 83-013, R at 299) recognizes that local commercial development could enable Veneta area residents to make a larger share of retail expenditures in Veneta.

Because the City is now unable to retain a significant percentage of retail trade, it can be assumed that absent some significant level of commercial development the City will also lose any increase in purchasing power that accrues with population growth. (Tanglewood Park Report, Land Planning Consultants, p. 5, fn. 5).

In addition to significant losses in retail trade, Veneta area residents are purchasing approximately 87 percent of their services outside the Veneta market area. (Exhibit 2 at 44-45 and Exhibit 3 at 3).

Due to the high loss of retail and services expenditures to the Eugene market area, the City finds that it is not presently fulfilling the mandate of its comprehensive plan due to a general lack of shopping opportunities within the City's urban growth boundary and due to a lack of selection of goods.

The narrative portion of the Commercial provisions of the plan require the City to satisfy the above-referenced deficiencies within the Central Business District. (Plan at 36). That district is defined in the Plan as an area which would begin

north of the library and extend just north of the new highway interchange. (Plan at 36). Therefore, the City must accomodate its role as a West Lane commercial and service center within the central business district area.

The Veneta Economic Analysis suggests that a shopping center would enable the City to maintain a higher percentage of wholesale and retail sales in the area, and help Veneta develop as a regional service center. (Exhibit 2 at 60). Moreover, testimony received during hearings on the Tanglewood Park proposal have convinced the City that provision of a shopping center would provide a needed facility if the City is to attract the kind of light industrial development it seeks.

Mike Shadbolt, Research Director of the Oregon Pacific Economic Development Corporation, after making general comments about major factors industrial users consider in locating new facilities, stated that Veneta did not have the array of modern services often required by those who select sites for light industrial concerns. (Testimony during joint session of Planning Commission and City Council, July 14, 1983). Mr. Jack Billsborough, an enginner for a computer hardware firm which may locate in Tanglewood Park (affidavit of C. Russell Ross) commented that it was important for the firm's potential employees to have nearby shopping with adequate market selection. (Testimony during joint hearing, July 14, 1983).

The City also heard testimony of Ken Nagao, architect for Tanglewood Park Enterprises, regarding the importance the Tanglewood Mall could have in establishing a positive commercial image for Veneta. Mr. Nagao explained that establishment of such an image would be important for the City's ability to attract future industrial and commercial development. (Testimony before Joint Hearing, July 14, 1983).

In addition to the Veneta Economic Analysis and testimony referred to above, the City was presented with a report from Mike Evans of Land Planning Consultants regarding Veneta's need for a major shopping facility. The report comments that while a single store represents a small addition to the total retail floor space of a total business community, a new shopping center adds considerable retail space to the community and has a much broader impact on retail trade activity. (Report at 5). The report goes on to explain that a shopping center would not only assist the City in recapturing lost retail trade

potential, it will allow the City to capture any increased purchasing power that accrues with population growth in the future. (Report at 5). Regarding existing retail trade potential the report, based upon a market analysis conducted by Consumer Attitude Research to determine the feasibility of a super-market on the Tanglewood Park property, concluded that the true market area included not only Census Tract 9 but an additional approximately 8,000 persons outside that Census Tract. (Applicant's Item 30). Considering a market this size, the additional population would almost double the \$28.6 million annual retail trade potential within Census Tract 9. (Report at 6). This expanded market area also affects potential population growth projections which are relevant to capture future retail trade. The report estimates that such retail trade potential in Census Tract 9 only would be approximately \$65.8 million by the year 2000. (Report at 6-7).

The Report concludes, and the City agrees, that the high percentage of existing retail sales lost to Eugene and its associated dollar volume, together with the potential of drawing significant trade into the community and future growth in retail trade potential with increasing population together support justification for a major shopping facility in Veneta. (Report at 7).

The City adopts the findings of the Veneta Economic Analysis and the testimony of Mr. Shadbolt, Mr. Billsborough, and Mr. Nagao as its general basis for concluding that construction of a major shopping facility within Veneta is necessary to make Veneta the West Lane commercial and service center contemplated by the comprehensive plan. Construction of such a center will assist Veneta in establishing a commercial image which is necessary for attraction of needed light industrial development. In addition, such a center would rapidly provide more needed retail and service industry establishments which will in turn offer a greater selection of goods and prices comparable to those in the Eugene market area. Establishment of such a facility would likely increase the City's ability to capture future retail and service purchasing power which is expected to accrue with population growth.

In addition to the above, the City is persuaded that the market area which will be served by such a facility is greater than that found in Census Tract 9 thereby further increasing the amount of retail trade, both existing and potential, that Veneta may capture through construction of such a facility.

In addition to the City's general goal of establishing itself as a commercial and service center, establishment of a major shopping facility will assist the City in creating much needed opportunities. The Veneta Economic Analysis demonstrates that Veneta has a high population to employment ratio. Only one job exists locally for every 6.5 residents, while the County ratio provides one job for every three residents. (Exhibit 2 at page 41 and 67). As discussed in the adopted Buildable Lands Inventory, 1983, the City has established a goal of creating one job for every five residents. (Exhibit 11 at 5). The applicant has estimated that construction of the Tanglewood Mall shall employ roughly 180 persons in Phase I which is intended for construction completion in early-1984. Of these 180 employees approximately 150 positions will be new and available to absorb unemployed persons from the Veneta Area. (Affidavit of C. Russell Ross at 3).

The City adopts the findings of the Veneta Economic Analysis regarding a need for job creation and is persuaded by the Applicant that construction of a major shopping facility will appreciably satisfy the City's need to create job opportunities.

Having concluded that a major shopping facility is needed, and having concluded that based upon existing plan policies that such a facility must be accommodated within the Central Business District, the City must consider what type of shopping facility is required to meet the City's needs. There are three types of shopping centers; neighborhood centers with a supermarket as its major tenant, community centers with junior department store or variety store as a major tenant in addition to the supermarket, and regional centers with one or more full-line department stores as major tenants. (Report at 8).

The Veneta Economic Analysis demonstrates that food stores within Census Tract 9 are capturing 73 percent of the potential market. Such performance is considered quite good when the area generally retains only 23 percent of all potential retail sales expenditures. (Exhibit 2 at 49-50). Because a neighborhood center has a supermarket as its principle tenant, based upon the above information, this type of center would merely duplicate the personal services already provided within the Veneta area. Development of such a center would not assist Veneta

in capturing a greater portion of lost retail trade potential and would not significantly assist the City in providing needed employment positions.

On the other hand, the regional center has as its major tenant one to two full-line department stores and generally requires a population of 100,000 or more for adequate support. A center of this scale cannot be warranted in Veneta where such facilities currently exist at competitive levels in Eugene. (Report at 9-10). Moreover, the City finds that establishment of such a center would have a detrimental impact on additional retail business in Veneta. The City bases this fact upon projected retail sales of Phase I of the Tanglewood Mall. Phase I will include 102,000 square feet (Report at 2) which is expected to generate \$10 to \$14 million in retail sales per year. (Affidavit of C. Russell Ross at 3). Since Veneta is presently losing approximately \$22 million in retail trade, construction of the Tanglewood Mall would consume less than 55% of the retail sales presently available within the Veneta market area. Construction of a regional shopping center, however, would include roughly three times the square footage of a community center. (Report at 8). If the gross retail sales of Phase I of Tanglewood Mall were multiplied by three, yearly sales would reach \$30 to \$42 million per year. If such a facility were constructed, its effect on other retail establishments within the City would be unreasonably detrimental and further construction of commercial facilities by other landowners would be impeded.

A community shopping center has as its major tenant a junior department store or variety store which is chosen to fulfill the primary needs of a community. Additional retail tenants are then chosen according to the needs of the community in order to provide a full arrangement of goods and services. (Report at 9). The Veneta area's primary deficiency is in non-food retail goods. (Exhibit 2 at 49-50). The City concludes therefore that a shopping center needs be established with a primary tenant chosen to provide merchandise in the non-food retail category. A community center is the appropriate type of shopping center to fulfill this capacity. (Report at 10).

The major feature of a community center is its ability to create drawing power rather than to simply fulfill the day-to-day needs as a neighborhood center. Veneta is currently lacking in this capacity as evidenced by its incapability of providing for

existing demands. The City concludes that establishment of a well-designed community shopping center with properly chosen major tenants will not only fulfill the needs of the Veneta community but will also attract new consumers to the area. In addition, this draw of consumers will not only benefit the shopping center itself, but will also benefit the established businesses in the community. (Report at 10).

The usual minimum site area for a community shopping center is 10 acres. (Report at 8; Exhibit 11 at 6). The Land Planning Consultants' report includes an exhaustive analysis of alternative sites within Veneta, which are suitable to fulfill the needs for construction of a community shopping center. The content of that report from page 12 through 15, the map preceding page 17, and pages 17 through 38 are incorporated herein by reference as the findings of the City regarding the CBD's ability to accommodate such a facility. The conclusions of the report are consistent with information gathered by the City and the Lane Council of Governments within the 1983 Buildable Lands Inventory (Exhibit 11 at 6-9).

The planning report concludes that a majority of the area's commercial lands inventory cannot be considered for development of a community shopping center due to parcelization, existing development inconsistent with large scale commercial development and inadequate traffic flows.

In particular, limitations on major commercial development of the downtown area include:

- Streets in poor condition and need improvement to accommodate significant traffic increases.
- Streets provide inadequate parking for major retail development.
- Territorial Road with an average daily traffic count of 5,900 at Dunham Avenue (Applicant's Item 27) is the only major road serving the area.
- The area is not located where readily visible or accessible to take advantage of east-west traffic along Hwy. 126 which has an average daily traffic count of 8,300 just east of Territorial Road (Applicants' Item 27).

- The area has a minimal amount of existing goods-related retail trade to attract additional consumer trade.
- The area lacks adequate configuration of vacant land to support the community shopping center.
- A large number of small parcels and individual ownerships create difficulties in consolidation.
- A large number of residential structures creates problems in developing associated parcels due to costs of removal and in creating the architectural style necessary to create a cohesive and attractive shopping district. (The City also relies upon the testimony of Mr. Ken Nagao in support of the notion that a cohesive and attractive shopping facility is necessary to create an immediate and identifiable commercial image for the City).
- Development of the CBD must take place over a long period of time due to potential conflicts between existing residences and a major commercial development with accompanying traffic and noise.
- Existing development in the area, exclusive of residences, consists primarily of service-oriented retail trade, public and semi-public uses.
- Exclusive of residences and vacant land, development in the area is 27 percent goods-related retail trade and 63 percent service trade, public and semi-public uses. (The City also relies upon Exhibit 24, a City-prepared land use map of downtown Veneta indicating existing land uses).

See generally Report at 30-31.

The report found two sites within the CBD in addition to the proposed Tanglewood Park project, which could be considered as possible locations for the needed community shopping facility. The first is known as Applegate Square and is comprised of approximately 8.97 acres. The City rejects this site for primarily two reasons.

First, the acreage is not located where it can take advantage of the main arterial passing through Veneta. It is located approximately 1,400 feet south of Hwy. 126 and 2,000 south of the new

Hwy. 126 alignment. It cannot capitalize on potential traffic volume along Hwy. 126 and does not have the benefit of existing traffic volume at the intersection of Hwy. 126 and Territorial Road. Present average daily trips along the Applegate Square site are 4,000 while average daily trip volume near the Tanglewood Mall site and Babb Center site is approximately 8,300. (Report at 33).

Second, consolidation of several parcels would be required before Applegate Square could become a reality. Although four parcels totaling 5.28 acres are under single ownership, the remaining three parcels totaling 4.74 acres are under separate ownership. Moreover, two of the three individually owned parcels have existing commercial uses. The three individually owned parcels are key to development of the site. They are located between Hunter Avenue and the Applegate Square-owned parcels. Without them and a secondary access to Hunter Road, a good traffic circulation pattern will be difficult to develop to accommodate a major shopping center. Moreover, the owners of the 5.2 acre area have been unable to retain ownership of Tax Lot 100 at the southwest corner of Territorial Road and Hunter Avenue. (Applicant's Item 37).

The City concludes that the Applegate Square site at 8.97 acres is somewhat smaller than the 10 acre area normally required for community shopping center. This, coupled with inadequate traffic flows and difficulty in consolidation, compels the conclusion that the Applegate Square site is inadequate for fulfilling the needs identified by the City above.

The only site within the Veneta urban growth boundary and central business district which is adequate to fulfill the need for the needed community shopping facility is the Babb Center site located at the intersection of Territorial Road and the proposed Hwy. 126 extension. This site is included within the Plan definition of the Central Business District at its northerly end. The 12.88 acre site is well located to capitalize on existing and potential Hwy. 126 traffic flow, is a large single ownership and has public facilities available for development. This site is currently proposed for development of a supermarket and a lesser amount of retail than that proposed in the Tanglewood Mall. (Testimony of Bert Babb, June 23, 1983). This type development would qualify as a neighborhood center. (Report at 38). Based upon the facts set forth in the Land Planning Consultants report and based upon the summary of those findings set forth above, the City concludes

that only one site presently within the CBD and urban growth boundary is of sufficient size to accommodate the commercial development needs identified above. Therefore, the Plan comment that the CBD contains sufficient lands to meet the City's needs is erroneous. Uncontroverted evidence in the record indicates that the Babb site will be developed with its primary emphasis on food-related retail sales. This is due to the fact that the project is primarily a relocation of the facilities currently existing at Harold's Market. The City finds that relocation of existing facilities will have an insufficient impact on the local economy to satisfy the need for creation of additional jobs and capture of lost retail trade in the non-food sector.

In addition, given the City's intent to recapture regional commercial demand through creation of a community shopping it is necessary to provide large buildable vacant parcels, serviced or readily serviceable with adequate public facilities which are located in close proximity to Hwy. 126. The Tanglewood Park commercial proposal includes a total of 18.62 acres (Report at 2) located at the north end of the existing central business district near the intersection of Hwy. 126 and Territorial Road. The site can be easily served by water, sewer, streets and private utilities (Exhibit 5 at 10-17).

The City concludes that provision of two large suitable and buildable sites provides sufficient market choice for the regional shopping facility. Provision of two sites will heighten Veneta's ability to establish itself as a West Lane commercial and service center as required by the comprehensive plan. In addition, provision of two sites will encourage more retail and service industry establishments offering a greater selection of goods and prices comparable to those in the Eugene market area. By providing such sites, the City intends to recapture existing retail and service expenditures presently lost to the Eugene market and to heighten its position within the Lane County economy for capturing future retail and service expenditures.

Based upon the foregoing findings and conclusions, the City concludes that amendments to the text of the commercial provisions of the plan are necessary to ensure internal consistency.

The third paragraph of the Central Business District narrative section should be amended to read as follows:

Veneta has adequate space to accomplish this in the expanded CBD area. This area, [which] would begin north of the library (site of the proposed Applegate Shopping Center), [would] and extend north of the new highway interchange to the intersection of Jeans and Territorial Roads, sites of the proposed Babb Shopping Center and Tanglewood Mall. This would in effect tie these two commercial areas together to function as an integrated commercial center, rather than as competing areas.

Bracketed material is to be deleted. Underlined material is to be added.

The City further concludes that the language set forth in Exhibit 14 shall be added to the Central Business District Narrative. That section explains the deficiencies within the CBD core area. It explains that no major retail development may occur within that area until such deficiencies are overcome. The Exhibit also discusses the Babb Center and Tanglewood Mall sites located at the Hwy. 126 Interchange.

C. Areas Requiring Clarification or Explanation to Ensure Consistency Issue Resolved/Minor Amendment Required.

There are certain portions of the plan that require clarification. The City does not consider these areas to be inconsistent with the Tanglewood proposal. The amendments made are merely clarifications of existing policy or data, that must be explained to ensure that the Plan is clearly understood and to ensure internal consistency. The purpose of these findings is to determine which sections of the plan are so affected.

1. Community Needs: Economy Page 6.

Because of the plan amendment regarding new plan policies, goals, and narrative regarding Light Industrial uses, this provision must be amended as follows in order to ensure internal plan consistency:

18. Written Testimony of Alex Pawlowski, July 14, 1983
19. Written Testimony of Jack Kelley for Veneta Merchants Association, July 14, 1983 and Revised Letter and Membership List, July 16, 1983.
20. Letter to Veneta City Council and Veneta Planning Commission from Jeffrey Bennett, Spies and Rune, P.C., Attorneys at Law dated July 14, 1983. This exhibit requests consideration of and inclusion in the record 38 exhibits. These exhibits will be labeled Applicant Items "1 to 38 "
21. Oregon Business, June, 1983 Edition with specific article on page 32 "Stamping Out a Recession".
22. Letter to David Kinney from David B. Williams, Robinette, Cleveland and Williams, Attorneys at Law, dated July 18, 1983.
23. Letter to Dave Kinney from Gary Darnielle, Senior Planner, Lane Council of Governments dated July 20, 1983.
24. Map of Veneta Downtown Area showing existing land uses by City of Veneta, July, 1983.
25. Map of Census Tracts surrounding Veneta
26. Map of Veneta - Computerized Parcel Map of City, Lane Council of Governments with data on existing land uses prepared by Land Planning Consultants, July 14, 1983.
27. Aerial Photograph Veneta
28. Schematic Plan of Tanglewood Mall prepared by Turnkey Construction for Tanglewood Park Enterprises, June, 1983
29. Perspective Sketch of Tanglewood Mall prepared by Nagao & Associates, Architects
30. Schematic Plan of Tanglewood Park Site showing proposed water and sewer utilities by Tom Poage, P.E. Poage & Rice, Inc.
31. Letter to City of Veneta City Council and Exhibits from Jeffrey Bennett, SPIES and RONE, P.C., Attorneys at Law dated July 21, 1983. This exhibit requests consideration of and inclusion in the record of 12 exhibits. These exhibits will be labeled Applicant Items "39 to 50"
32. Letter to Mr. David Kinney, City Administrator from Jim Saul, MUS SAUL, Land Use Planning Services for Applegate Square Shopping Center dated July 21, 1983.

"b. Economy

The economic future of Veneta will be as a service area for the West Lane area. Therefore, the central business district (CBD) must be developed to accommodate this potential demand for goods and services and new industrial sites must be added to permit development of light industries. (Underlined language is new).

This amendment reflects the City's policy to not only encourage Veneta's development as a retail service center, but as a light industrial employment center as well.

2. Community Objectives/Problem Statements - Page 10

The following change is based upon the reasoning in part 1 above and is required to ensure internal plan consistency:

"Since Veneta lies in a strategic location to serve the West Lane Area . . .

Adequate space for commercial and industrial development must be provided in a manner which will be most beneficial for the community . . ." (Underlined language is new).

This amendment reflects the policy shift to establish a more balanced, diversified economic base incorporating retail trade, services and industry.

3. Development Options: Sewer - Page 20.

The following text amendment is necessary to make the plan's discussion of sewer facilities factually accurate. Amend the third paragraph to read as follows:

"Based on the existing population distribution, approximately 1,550 persons reside in the area west of the present service boundary. Through the issuing of permits, about 1,000 of these residents have or will have use of the treatment facilities. The City has upgraded the sewage treatment facility by purchasing 78 acres of land north of the existing lagoon and constructing a spray irrigation system on approximately 40 acres

of pasture land. Phase III, Option 3 outlines the most feasible future development pattern due to the installation of the spray system and the potential now available to construct on the enlarged spray system and/or second lagoon on the west side. Development will be encouraged in areas with gravity flow sewer service with additional pump stations needed to serve the eastern half of the city. (Plan at 27)."

This change is supported by the facts regarding improvements to the City's sewer facilities found at Part II, Section B(2)(C)(i), supra.

4. Land Use Plan--Page 29.

The following change is based upon the reasoning in Part 1 above and is required to ensure internal plan consistency. Amend the first paragraph to read as follows:

The Veneta Land Use Plan is comprised of [seven] eight major plan designation areas:

1. Light Industrial
2. Industrial-Commercial
3. Commercial
4. Medium Density General Residential
5. Low Density Single Family Residential
6. Rural Residential
7. Public/Semi-Public
8. Open Space

(Underlined language is added).

5. Utilities Plan - Sewer: Page 46

Add the identical narrative set forth in part 3 above between the two paragraphs of this section in order to ensure factual accuracy within the plan.

D. Areas that Need be Developed due to lack of Necessary Implementing Provisions within the Plan

The Tanglewood Park proposal proposes addition of 54.67 acres of land designated Light Industrial on the comprehensive plan. The unamended plan contains no goals, policies, or narrative statements regarding light industrial development within Veneta. Unamended Industrial-Commercial policies, however,

recognize that industrial policies need be developed after land use and economic data has been compiled and analyzed. (Plan at 34). The unamended Industrial-Commercial goal is to provide opportunities for industrial development to diversify and expand Veneta's economic base. (Plan at 34).

The charge of these plan provisions has been carried out by Veneta. As reflected in Part II Section B (1) numerous studies have been completed regarding the Veneta economy and the need for establishment for large industrial site. The pertinent studies and reports include:

- Economic analysis of Veneta and Surrounding area, University of Oregon, 1980, (Exhibit 2).
- Goal of Veneta Economic Development Committee, September, 1980 (Exhibit 3; City Council Resolution No. 262).
- Economic Improvement Strategies; Specific Economica, Inc., January 1981 (Exhibit 4).
- Site Selection and Review, Veneta Economic Development Committee, no written report, 1981-82.
- Veneta Industrial Site Analysis, University of Oregon, 1982, as amended by City of Veneta, 1983 (Exhibit 5).
- Economic Audit of Lane County, Fantus Company for Lane Economic Foundation, 1980, (Exhibit 6).
- Industry Screening and Target Industry List. The Fantus Company for Lane Economic Foundation, 1982 (Exhibit 7).
- Lane County Economic Fact Book, Oregon Pacific Economic Development Corporation, 1983 (Exhibit 8).

The City adopts by reference herein the facts and discussion set forth in Part II, Section B(1) and the summary reports referred to therein as if fully set forth. Based upon those findings, the City adopts Exhibit 13 in its entirety as an amendment to the Veneta Comprehensive Plan. Such exhibit includes a goal, policies, and narrative which shall guide the City in providing sufficient lands for development of attractive light industrial uses to serve Veneta and the surrounding area.

The City concludes that this amendment is necessary to achieve internal consistency between the comprehensive plan and the Tanglewood Park application.

E. Remainder of Plan

The City finds that the foregoing plan provisions (those found consistent with the proposal, those found inconsistent and requiring amendment, those requiring clarification and those requiring establishment) are the only provisions of the plan applicable and relevant to the Tanglewood proposal.

IV. EVALUATION OF TANGLEWOOD PARK--COMPLIANCE WITH AMENDED COMPREHENSIVE PLAN/FINDINGS IN SUPPORT.

Introduction. The Tanglewood Park proposal must be found by City to comply with the acknowledged Veneta Comprehensive Plan. ORS 197.175(1)(d). Because plan text amendments have been adopted through previous parts of this findings report, this part evaluates the plan compliance based upon the amended plan. The following sections of the Plan are determined relevant and applicable to the application:

A. Land Use Plan.

The goal of this section of the Plan is to "provide sufficient buildable lands . . . to allow Veneta to develop as a Mid-Lane Service Center and a suburban residential community with an appealing rural setting." Policy 3 requires all urban lands in the community to develop prior to annexation of additional residential lands. (Plan at 29).

Narrative provisions of this section of the Plan encourage maintenance and development of high intensity uses in and around the CBD in order to ensure development in areas served by water, sewer, and transportation facilities. The Plan also adopts the urban services boundary concept (defined as areas that can be served with public sewers) and restricts lands divisions outside the UGB unless both public water and sewers are available.

Tanglewood Park adds 54.67 acres of buildable lands to the City's light industrial land supply and 15.80 acres of buildable lands to the commercial land supply. The 1983 Buildable Lands Inventory (prior to addition of Tanglewood lands) shows a need for 45.30 acres of buildable light industrial lands and 10.32 acres of buildable commercial lands. Addition of the

Tanglewood Park properties will assist the City in meeting its Plan goal of providing sufficient buildable land to develop as a Mid-lane Service Center.

Tanglewood Park will include an 18.62 acre community shopping facility and a 54.67 acre light industrial park. The applicant has submitted schematic site plans and perspective sketches of the proposed shopping facility. (Exhibits 28 and 29). The applicant's architect testified before the Planning Commission and City Council and explained that the center is designed around Veneta's image as a natural and rural area. Construction materials will include wood siding and the shopping facility is located on the site in such a way as to take advantage of the natural terrain. (Testimony K. Nagao, July 14, 1983). The City believes such testimony and concludes that the project will be consistent with Veneta's rural setting.

Moreover, both the Industrial Park and Tanglewood Mall projects must go through the site plan review and landscaping provisions of the Veneta Land Development Ordinance No. 178, Section 5.310 et seq. and Section 5.120, prior to development.

Because of its location within the CBD (Amended Plan at 36) Tanglewood is consistent with the Plan's goal of encouraging high intensity uses in and around the CBD. The proposed shopping facility is a high intensity use with Phase I including 102,000 square feet of retail space and 437 parking spaces. Phase II will add 70,000 square feet of additional space and 350 parking spaces. (Report at 2).

The proposed industrial park, although not immediately a high intensity use, will house at least one light industrial user by the close of 1983 which is anticipated to operate from an 8,700 square foot facility and employ roughly 50 persons. (Affidavit of C. Russell Ross, p. 1-2; testimony of J. Billsborough, joint Planning Commission/City Council meeting, July 14, 1983). Within two years the industry intends to employ 200 persons on approximately 13.15 acres. (Affidavit of C. Russell Ross, p. 1; testimony of J. Billsborough, July 14, 1983).

The above employment/acre figures demonstrate that both the proposed shopping center and industrial park will operate at a ratio of 15/1. This is either consistent or less dense than the employee/acre ratios assumed in establishing needed lands through the 1983 Buildable Lands Inventory. (Exhibit 11 at 6). The

City concludes that the Tanglewood project will be consistent with densities within the CBD.

Moreover, as shown in Part II, Section B(2)(c)(i) and Part III, Section B(4) the site is served with adequate public sewer and water facilities. Because the site has these services the City interprets the site to be urban as that term is used by the Land Use Plan element of the Plan. (Plan at 31). The Site's inclusion within the Veneta Urban Services Boundary is therefore justified and the City concludes that the boundary be expanded to accomodate the Tanglewood Park proposal.

Finally, the City interprets Policy 3 to allow annexation of the Tanglewood Park. This policy was recently amended to allow annexation of industrial and commercial lands prior to development of other lands so planned and zoned. (Ordinance 234, Section 2; July 19, 1982). Prior to the amendment the policy precluded all annexations prior to development of existing urban land so zoned. This amendment demonstrates the City's change in policy to encourage industrial and commercial development such as Tanglewood Park.

Based upon the foregoing findings the City concludes that the Tanglewood proposal complies with the Land Use Plan provisions of the Veneta Plan.

B. Light Industrial

The goal of this Plan section is to provide available lands for light industrial development. Policies state that such lands must:

1. Be located adjacent to arterial streets and/or rail, and public facilities to allow easy development.
2. Be developed as light industrial parks in attractive settings with minimal environmental impacts.
3. Encourage immediate industrial development and protect land in large parcels for future development.

Tanglewood Industrial Park is located on Jeans Road, a secondary arterial. (Plan at 53). Public water includes a 16" main in Territorial Road an a 10" main in Jeans Road. A loop water system has been designed through the site to ensure adequate water flows to

provide sprinkler systems to industrial development. (Testimony of T. Poag, civil engineer, July 14, 1983). Public sewer includes a 8" main in Territorial Road and an 8" main in Jeans Road and into the site some 1,150 feet. (Exhibit 5 at 14). As with water, a loop system has been designed to service the site, with a pump station planned for the east side of the industrial park. (Testimony of T. Poag, July 14, 1983).

Tanglewood Park will be developed as a light industrial park in an attractive setting. The physical characteristics of the site are included in the Veneta Industrial Site Analysis (Exhibit 5, p. 12-15) and are incorporated herein as the findings of the City. Tanglewood Park complies with the Light Industrial policies of the Plan.

The narrative provisions of the Light Industrial plan make frequent mention of Tanglewood Park. Such references indicate the City's intention to provide Tanglewood Park with appropriate plan and zoning designations consistent with the findings and discussion within the Plan. Based upon the Plan discussion of Tanglewood Park which are incorporated herein as findings the City concludes that the 9.49 acres presently within the City and zoned RR and GR must be redesignated on the Plan Map as LI and zoned LI in conjunction therewith. Further, the City concludes that the 45.18 acres outside the city must be designated LI on the Plan map.

C. Commercial.

The commercial plan designation designates Veneta as a West Lane commercial and service center. Plan narrative requires that the City accomplish that goal within the Central Business District which extends from the Fern Ridge Library north to the Tanglewood Mall site. (Amended Plan at 36).

The Tanglewood Mall is within the Veneta Central Business District. An additional 15.80 acres of commercial lands are proposed for Commercial zoning.

The 1983 Buildable Lands Inventory establishes a need for an additional 10.32 acres of commercial land to meet projected demands. The inventory also discusses market choice as a necessary consideration if Veneta is to recapture lost regional commercial demand, and that the best way to accomplish recapture is through

creation of a regional shopping center. The inventory recognizes two sites as suitable to fulfill that goal, the 12.88 acre Babb Center Site (zoned I-C) and the 18.62 acre Tanglewood Mall site. Placing a Commercial Plan designation on the Tanglewood property is consistent with the Buildable Lands Inventory.

The narrative portion of the commercial lands plan provisions refers to Tanglewood as an attractive site for development as a larger retail shopping center to serve the Veneta area. The plan describes the site as desirable for commercial development because of its excellent access, high visibility, available water and sewer and large parcel size. The narrative also recognizes that development of Tanglewood will enhance Veneta's position as a West Lane Services and Commercial center in accordance with the plan and that such designation complies with the plan.

Based upon the foregoing the City concludes that the 15.80 acres outside the City shall be designated as Commercial on the comprehensive plan map.

D. Rural Residential.

The rural residential plan designation covers a very small portion (4.16 acres) of the Tanglewood property. However, the County lands are also currently designated RR-2 ac.

City plan policies emphasize that the Phase I Development Area will be the primary development area until new water and sewer facilities are completed. When services do become available, an easy transition of plan designations from rural residential to industrial/commercial or residential uses will be encouraged. (Plan at 31).

Water service is readily available to the property with the completion of Phase I water improvements. A 16" line runs to the intersection of Territorial and Jeans Road and a 10" line abuts the site along Jeans Road.

Approximately 1/2 the land area is already serviced. The eastern half of the property will be serviced by a pump station to provide adequate gravity flows. The applicant has planned to install a pump station as part of Phase I development.

Conversion of RR lands to LI or C uses is logical since the area is serviceable, after on-site extension of city services.

E. Utilities Plans

1. Water. The city incorporates all previous water facilities findings herein to support its conclusion that the Tanglewood project complies with the Veneta Water Facilities Plan.

2. Sewer. The city incorporates all sewer facilities previous findings herein to support its conclusion that the Tanglewood project complies with the intent and purpose of the sewer provisions of the Utilities plan element.

F. Transportation.

The Comprehensive Plan goal is to provide a safe and smooth circulation system for vehicular traffic. Plan policies anticipate construction of the Highway 126 By-Pass and upgrading of Territorial and Jeans Road near the proposed industrial sites. Improvements to Hwy. 126 are included in the Oregon Highway Division capital improvement program for the 1983-84 fiscal year. Improvements to Jeans Road are included in the Lane County CIP for the 1987 fiscal year. The Planning Commission is required to approve street plans for new developments. Veneta Land Development Ordinance; Section 5.330(1).

Highway 126, Territorial and Jeans Road are now sufficient to handle traffic volumes for the proposed commercial and industrial uses north and south of Jeans Road. However, improvements will be needed to upgrade each.

The City concludes that the transportation system planned for the Tanglewood property will be safe and smooth for vehicular traffic and that the proposal is consistent with the plan.

G. Areas Subject to Development Constraints.

The Veneta Plan calls for the protection of property from natural hazards and disasters.

The Ross property is adjacent to Fern Ridge Reservoir, wetlands and flood hazard areas. The northern edge of the Ross property is subject to drainage limitations and the northwestern corner lies within the 100 year flood plain (Exhibit 10). Storm water impacts must be carefully evaluated pursuant to the City's Storm Drainage Plan (Exhibit 9) on the north edge of the site to prevent negative impacts on the Fern Ridge Reservoir property.

The Plan requires lands with designated hazards to undergo an in depth review of development limitations at the time a land development request is made. (Plan at 67). Given such requirements the City interprets the plan compliance issue to be limited to requiring identification of potential development constraints and finding that the City has mechanisms implemented to address those constraints in the event a development request is made. Such constraints have been identified and the City has adopted the necessary mechanisms to address them in the event a development proposal for Tanglewood is submitted. Based upon these facts the City concludes that the Tanglewood proposal complies with this section of the plan.

H. Growth Management.

The Veneta plan requires that all new developments shall be reviewed upon the city's ability to provide needed public services and facilities concurrent with or prior to such development.

The City has reviewed the water and sewer services available to serve Tanglewood Park earlier in these findings and concluded that such services are presently adequate to serve the proposed industrial and commercial uses. The City incorporates those findings herein by reference to support its conclusion of compliance with this section of the Plan.

I. Established Need.

The unamended plan requires a documentation of "established need" for all comprehensive plan changes. The City makes findings pursuant to LCDC Goal 2, Part II--Exceptions in the next part of this document. (See discussion of Goal 3 Exception, part a. Need; Why the proposed industrial and commercial uses should be provided for.) The City adopts those findings as its findings for compliance with the "established need" criteria of the Plan and incorporates them here.

V. LCDC GOAL COMPLIANCE/FINDINGS AND CONCLUSIONS

A. Goal 2 - Land Use Planning

Goal 2 requires the city to "establish a land use planning framework as a basis for all decisions and actions related to the use of land and to assure an adequate factual base for decisions and actions." As

part of this application this requires the City to prepare an analysis of the Veneta economy, coordinate land use actions with affected jurisdictions and prepare implementation measures to ensure that property owners and city officials follow the Veneta Comprehensive Plan and LCDC goals and guidelines.

Since April, 1980, the City of Veneta and others have prepared inventories and factual data evaluating the commercial and industrial needs of the community and the potential for development in Veneta. This information is summarized in Part II, Section B of these Findings and is incorporated herein by this reference. Much of the data gathered through these studies has been used as a basis for the City's action in this case. Moreover, the City will enter into a planning agreement with Lane County, the County authorizing the City to exercise planning functions in the Tanglewood area. See also LC 10.710 - Contract Zoning District. The proposal complies with Goal 2.

B. Goal 3 - Agricultural Land

Goal 3 is intended to preserve and maintain agricultural lands for agricultural uses if such lands are not committed to non-resource uses, i.e., cannot be used for farm use. Because the soils within the Tanglewood parcel include predominantly SCS Class II-IV soils, a Goal 2, Part II Exception must be taken to allow non-agricultural uses.

The City has reviewed the exception on two different bases. First whether the site is developed and committed to non-resource uses. Second, assuming the site is not committed to non-resource uses, whether the Tanglewood lands are needed for urban uses, after considering alternative sites, consequences of not applying Goal 3 and compatibility with adjacent uses. This exception is intended to apply to both Goals 3 and 4.

1. Commitment to Non-resource uses.

Lane County granted subdivision approval for development of the Tanglewood property (the eastern approximately 65 acres) in 1980. The approval allowed division of the property into two-acre rural residential lots and C. Russell Ross, a principal in Tanglewood Park Enterprises, completed the plat in 1980.

After recording the plat, Mr. Ross extended water and sewer utilities into the site from existing public facilities in Jeans Road south of the site.

In addition, Mr. Ross extended streets into the subdivision including Todd Way, Russ Court and Hope Lane. All these streets are paved and built to county residential street standards.

During development of the subdivision, the site was cleared of virtually all vegetation with the exception of trees on the north and eastern boundaries. The site is not now, nor has it been recently (within five years) used for agricultural purposes. Subsequent to development of the subdivision, Mr. Ross sold two lots, one to Lee and Bobbi Schimmer who have no objection to the Tanglewood application. The other was sold to the Veneta Gospel Lighthouse Pentecostal Church of God.

In the event the subject plan amendments are not approved, Tanglewood Park Enterprises may continue to sell two-acre lots based upon the earlier subdivision.

The remaining acreage (approximately 3 acres at the west end of the project) is adjacent to Territorial Road to the west, developed commercial and residential (two) uses which front on Jeans Road to the south and the Tanglewood subdivision to the east.

Because the Tanglewood subdivision has been approved, recorded, partially constructed with public sewer and water services and streets, and developed with a residence, the City is compelled to conclude that it is predominantly built and committed to non-agricultural uses. Because the remaining acreage is adjacent to existing commercial and residential development and is bordered by Territorial Road on the west and the Tanglewood subdivision on the east, the City is compelled to conclude that it is built and committed to non-agricultural land uses. Based upon such finding of commitment, the City concludes that the Tanglewood proposal complies with Goal 3.

In the event the City's conclusion of commitment is not upheld upon any appeal, the City sets forth the following findings that explain why it is not possible to apply Goal 3 (as required by Goal 2, Part II-Exceptions.)

2. Goal 2, Part II Exception.

a. Need; Why the proposed industrial and commercial uses should be provided for?

There are numerous reasons the City needs to include the Tanglewood properties within the Veneta urban growth boundary:

- Existing Plan Policies encourage Veneta to establish itself as a West-Lane Commercial and Services Center and to provide sufficient lands for industrial development to diversify the economy.
- The 1983 Veneta Buildable Lands Inventory demonstrates a need for additional commercial and industrial lands within the City, especially in large lots.
- Recent economic studies show that:
 - = Veneta area residents are underemployed and that additional jobs should be created.
 - = 87% of all services expenditures and 77% of all retail sales expenditures of Veneta area residents are lost to the Eugene area; the City intends to recapture as much of that loss as possible.
 - = There is a serious deficiency in large lot industrial and commercial lands that are available, properly zoned, and have access to sewer, water, improved streets, and drainage facilities.
- Development of Tanglewood Park will assist the City in achieving its economic development and planning objectives by:
 - = Providing a necessary retail service to potential employees of new industrial firms presently lacking in the City.

- = Establishing an image for the City as a progressive growing community.
- = Creating immediate construction employment and imminent employment positions in the clerical, service, and unskilled workers area.
- = Capturing and recapturing an estimated \$10 to \$14 million annual retail expenditures.

The City finds the following facts in support of each reason for the City's need for Tanglewood Park:

- Plan Policies

- = Commercial lands. The goal and narrative sections of this portion of the plan foresee Veneta as a West-Lane Commercial and Service Center. (Plan @ 43). See also Plan @ 6 and 10.
- = Industrial lands. The goals and policies of the unamended Plan (@ 34) require Veneta to conduct economic studies to evaluate the City's potential for development, and to provide sufficient lands to diversify the Veneta economy.

There is presently no large-scale commercial development in the City. The Plan has identified the Babb Center as one site that could fulfill that need. On July 18, 1983 the Veneta Planning Commission approved site design plans for relocation of Harold's Market to that site. Harold's Market, owned and operated by Bert Babb is presently located at the intersection of Highway 126 and Territorial Road and is essentially the largest retail facility in the city. This is reflected by the fact that only 27% of retail expenditures for food items are lost to Eugene, (compared with more than 75% of all other retail expenditures). Exhibit 2 @ 49-50.

As is the case with commercial lands, the City has insufficient large lot industrial lands to attract light, clean industry to the community. The Veneta Economic Analysis concludes that there is a shortage of vacant, uncommitted available land for industrial use and that in April 1980 only 2-1/2 acres of buildable land not committed to commercial uses was properly zoned for industrial uses. (Exhibit 2 @ 60-65). In 1980 the Veneta Economic Development Committee established goals to encourage designation of large sites for economic development. (Exhibit 3). In 1981 Pacific Economica suggested as point one of an economic development strategy the City must establish an industrial area and protect large industrial sites. (Exhibit 4 @ 1 and 7).

During 1981 and 1983, the EDC considered many large industrial sites within and outside the urban growth boundary to designate for large lot industrial development. The sites considered and their strengths and weaknesses are set forth at pp. 8-10 of these findings and are incorporated here as the findings of the City. (See also, Testimony of Alex Pawlowski, Chairman, Economic Development Committee; Joint Hearing July 14, 1983). In 1982 the University of Oregon reviewed five of these sites in depth together with the Tanglewood site. (Exhibit 5). Two studies were completed by the Fantus Company for the Lane Economic Foundation in 1980 and 1982. The findings of those studies are set forth at pp. 10-12 of these findings and are incorporated here as the findings of the City.

The thrust of these reports is that Veneta exhibits a shortage of industrial acreage in tracts large enough to attract the industry Veneta needs to diversify its economy, that those sites within the City UGB are insufficient to meet that need due to various constraints, and that Veneta must plan and zone additional lands to meet those needs. Tanglewood Park has been identified as being perfectly suited. (Exhibit 5). The City adopts the findings of these reports and studies as referenced.

- Economic Studies.

= Underemployment. The Veneta Economic Analysis indicates that there is an extreme shortage of employment opportunities in Veneta and that employment opportunities for area residents should reach one job for each five residents rather than the existing one for each seven. (Exhibit 2 @ 40-42). See also Exhibit 4 @ 3. Veneta has historically been heavily dependent on lumber and wood products manufacturing. This lack of diversification detrimentally affects Veneta during wood industry slumps. (Exhibit 2 @ 7). This is demonstrated by the 1982 layoff of nearly 450 Veneta area employees by International Paper Company. (Testimony of Howard Smith, former plant manager for International Paper Co. June 27, 1983).

= Expenditures Recapture. The City's findings regarding recapture and capture are set forth at pp. 31-33 and 38-39 (discussion of capture where existing store relocated) and are set forth here to support a need to recapture existing and potential retail and service expenditures.

= Large Lot Industrial and Commercial Parcels. The City's findings regarding this issue are set forth in the Plan Policies section immediately above and at p. 25 (market choice-Buildable Lands Inventory), pp. 31-40 (need for specific type and size of commercial development) and pp. 42-44 (need for large industrial sites). Those findings are incorporated here to support a need for large commercial and industrial parcels.

- Need for Tanglewood Mall.

= Retail Service for Industrial Sites. The City's findings regarding the need for adequate Veneta retail facilities to attract light industrial development are set forth at p. 32 of these findings (Testimony of M. Shadbolt, J. Billsborough, and K. Nagao) and are incorporated here to support a present need to quickly establish adequate commercial shopping facilities which will in turn enhance the City's ability to attract industrial development.

= Establish Image. The City's findings regarding the need to establish a positive commercial image are set forth at P. 32 (testimony of K. Nagao) and p. 33 (conclusions).

= Employment Creation/Retail Sales. Approval of this land use request will result in construction of Tanglewood Mall and possible location of a computer hardware manufacturing company within Veneta. The applicant has estimated the following benefits will be conferred on the City and its residents with construction of those two facilities only (Affidavit of C. Russell Ross):

Industrial Lands: The computer firm would employ approximately 50 employees during its first year of operation and nearly 200 within a three-year time period. The firm plans to start construction in early-fall, 1983 and to start operating from the site in December, 1983.

Estimated construction costs for 1983 development are approximately \$500,000.

Although many employees will make more than an average \$4.50 per hour, if one assumes that 50 employees were paid \$4.50 per hour and working a 40 hour week, the electronics firm will create a payroll of \$3.5 million during its first year of operation, 1984. At full operation the firm's payroll would be approximately \$14 million per year.

Commercial lands. The Tanglewood Park Mall is intended to be developed in two phases. Phase I will include a 102,000 sq. ft. mall of which approximately 65 percent has been pre-leased. Two major tenants including a supermarket and general merchandise store and seven of the specialty shops have been pre-leased.

The number of employees in Phase I is estimated to reach 180. Of the 180 employees, approximately 30 will be transfer employees from existing businesses within the Veneta

area. The remaining approximately 150 employment positions will be new positions and available to absorb unemployed persons from the Veneta area.

Construction costs for Phase I of the Tanglewood Park Mall are approximately \$3.5 million. Tanglewood Park Enterprises has committed itself to hire as much local labor as possible during construction of the Mall. (Testimony of John Reed, Joint Hearing, July 14, 1983.

Based upon all employees averaging \$4.50 per hour and working 40 hours per week, the payroll for Phase I, not including construction payroll, will be approximately \$10.5 million per year.

Retail sales from the mall are anticipated to range from \$10 to \$14 million in 1984.

The foregoing compels the City to conclude that a need exists to amend the Veneta urban growth boundary. The unamended Plan requires the City to diversify its economy by providing sufficient lands for commercial and industrial development. Present city lands are not fulfilling that need either due to lack of size, services or other constraints such as floodplain. The City presently provides too few jobs per area resident and due to a lack of non-food retail and service establishments is losing over 80% of the combined retail and services expenditures Veneta area residents make. In order for the City to attract needed industry for job creation, it appears necessary that the City provide a range of retail services. This will also assist the City in recapturing lost retail and service expenditures. Finally, Tanglewood will assist the city fulfill all these needs from creation of jobs and a wide selection of retail vendors to providing large, buildable and serviced lots for industrial development.

- b. Alternatives. What alternative locations in the area could be used for the proposed industrial and commercial uses?

The City has carefully considered alternative locations for large light industrial and commercial lands within the Veneta urban growth boundary.

Industrial Sites. The site selection review process (set forth at pp. 8-10 of these findings) is set forth as findings here in support of the City's conclusion that all but one potential large industrial site within the UGB is unbuildable (due to: lack of services, street access, floodplain or location near residential uses). The City adopts the Veneta Industrial Site Analysis (Exhibit 5) in its entirety as its findings regarding alternative industrial sites and in support of the conclusion that only the Jeans Road industrial site (site #2) is presently buildable within the UGB and that to ensure market choice of sites and capture a competitive share of the industrial development that will occur in the Eugene metropolitan area, more than one large industrial site be located within the Veneta UGB.

Commercial Sites. The City's findings regarding alternative commercial lands are set forth at pp. 36-39 of these findings, which incorporate pp. 12-15, the map preceding p. 17 and pp. 17-38 of Tanglewood Park: A Community Shopping Center and Industrial Park Development. The City incorporates those findings and conclusions here in support of its conclusion that only one large commercial site (Babb Center) is presently available to fulfill the needs articulated in subsection a. above and that to ensure market choice in sites and in retail goods selection for Veneta area residents more than one large commercial site be located within the Veneta UGB.

Based upon the above findings and conclusions regarding commercial and industrial lands, the City is compelled to conclude that all alternative sites within the UGB have been reviewed in concluding that the Tanglewood properties be included within the Veneta UGB.

3. What are the long-term environmental, economic, social and energy consequences to the City of Veneta, the region, and the state of not applying Goals 3 and 4 and by permitting exceptions to allow the City of Veneta to amend its Urban Growth Boundary?

- (a) Environmental. The property is adjacent to Fern Ridge Reservoir and appropriate safeguards must be provided to avoid negative environmental impact. The City Land Development Ordinance and Storm Drainage Study must be complied with upon development of Tanglewood and incorporate proper care and performance standards for storm drainage, discharge, noise, and odor considerations that may affect the air or water quality of the area. Connection of all developed properties to the sanitary sewage disposal system of the City of Veneta will prevent the discharge of waste to the soil and a potential gravitation to Fern Ridge Reservoir prior to treatment.
- (b) Economic Impact. The economic impacts on Veneta and the surrounding area will be dramatic if the Tanglewood Commercial-Industrial Park is developed. Veneta has been designated by the Oregon Department of Economic Development as an economically lagging area. (Applicant's Items 32 to 35). The attraction of new employers to the Veneta area will enable the city and Lane County to diversify the economy, eliminate dependence on the wood products industry and stabilize the job situation in Veneta. The commitments the applicant has obtained for both the industrial park and the retail commercial center are evidence of the economic benefit the City and its residents will receive if this exception is granted.

To reiterate the Veneta problems, there is an extreme shortage of employment opportunities in the Veneta area, there is a high degree of reliance on the Eugene-Springfield area for employment, the Veneta area is greatly impacted by fluctuations in the wood products industry, the loss of 600 jobs at the International Paper

Company mill has severely depressed the local economy and the majority of Veneta residents who work commute to Eugene-Springfield. Lastly, the female sector of the economy in Veneta employs less than 25% of those able to work. Creation of new jobs in the community, especially in the clerk and service occupations anticipated for the commercial development, will help eliminate and alleviate some of these structural problems that exist in the Veneta economy.

- (c) Social Impact. The social impact of the development of the property will be substantial. One of the major difficulties with Veneta is a lack of a sense of pride and sense of community. (Testimony of Scott Taylor, Alex Pawlowski, and Gary Sazner; Joint Meeting 7/14/83). Creation of jobs in Veneta will serve to focus living opportunities, including employment and recreation in Veneta. As a bedroom community right now, Veneta lacks that sense of pride and sense of self. The sense of community cannot be developed by a majority of local residents without job opportunities being created locally.

This is not to say that the impact approval will have on the older portion of downtown, including downtown business, has not been considered by the City in reaching its decision. The City finds that development of the Tanglewood Mall will increase the number of dollars spent in the community, increase the number of Veneta area residents who will stay in the area to shop and therefore increase potential customer and retail/service trade flow for the downtown core area. In addition, the City adopts the findings set forth at p. 35 (relating to Tanglewood's estimated market consumption rate) to conclude that nearly a majority of the potential retail market and nearly all of the potential service market can still be captured by downtown merchants and service providers.

- (d) Energy Impacts. Both Pacific Power and Light and Lane Electric Cooperative have indicated that development of the industrial lands will have minimal impacts on energy consumption and provision of service to the Veneta area and specifically to the Tanglewood Industrial Park. Moreover, expected reductions in market leakage will reduce the number of miles consumers drive to purchase goods.

4. Is the proposed use compatible with other adjacent uses?

The city finds that the development of the Tanglewood Industrial Park will be compatible with adjacent uses. Those uses are:

- (a) Park and recreation area of Fern Ridge Reservoir and Applegate Park owned by the Army Corps of Engineers. The proposed use is compatible with the Park development to the north due to setback and landscaping requirements of the Veneta Land Development Ordinance. No negative impacts are anticipated.
- (b) Commercial Use. Adjacent to the west and south of Tanglewood Industrial Park are lands already zoned (Babb Center approved 7/18/83) or developed (Bank) for commercial development. Industrial uses adjacent to these commercial sites will enhance their use as a commercial area.
- (c) Light Industrial Use. The proposed light industrial use of Tanglewood will be compatible with the light industrial use of the Gerlach property south of Jeans Road.
- (d) Rural Residential. The adjacent properties to the east and southeast are rural residential lots on parcels of two acres or larger. The impact on the adjacent residential uses will be minimal. A deed restriction with one property owner (Lee Schimmer) who will be immediately affected by the development will create a 200-foot buffer strip between development of the properties.
- (e) Agricultural and Forestry Uses. The park site to the north and residential property to the east include forested lands. The park site provides an urban buffer, watershed protection, wildlife habitat and recreation area.

Conclusion.

Based upon its consideration of the foregoing facts, the City is compelled to find that the proposed Tanglewood Industrial Park does meet the standards for an exception to the agricultural and forest lands goals requirements and that development of the property as an urban commercial and industrial use will provide needed lands to the City. The City's plan

shall be amended to reflect the exception and the language "An exception was taken to justify inclusion of this site within the Veneta Urban Growth Boundary." shall be included at page 34 of the unamended plan (commercial lands) following the narrative discussion of Tanglewood, within the newly amended provisions of the Light Industrial provisions discussing Tanglewood.

C. Goal 4 - Forest Lands.

Goal 4 is designed to conserve forest lands for forest uses. In order for the Tanglewood Park to be incorporated into the City of Veneta urban growth boundary, an exception to LCDC goal 4 "Forest Lands," is required to permit the transition to a more intense urban density development. The City has previously made findings to support an exception for Goal 3 and incorporates those findings here. Veneta has also reviewed an exception to Goal 4 based on the following additional analysis.

1. Is the property being used for a commercial forest use? No.

The Tanglewood Park site is currently cleared with the exception of the eastern-most section being covered with second-growth Douglas fir. The property is designated as site class 3 with a potential yield of 120-150 board feet per acre. The City finds that the size of the parcels, zoning as a residential subdivision, installation of streets, and existence of residences east and south of the site will not permit a sustained commercial forest use.

2. Is the watershed protected in the area?

Fern Ridge Reservoir is adjacent to the property on the north side. Applegate Park, the area owned by the Army Corps of Engineers separates the Fern Ridge Reservoir from the Tanglewood Park property. The Tanglewood property is all higher than the 375 feet high water elevation of Fern Ridge Reservoir. City connection to storm sewers and sanitary sewers for all proposed industrial uses will eliminate or mitigate the environmental hazards and watershed problems created by urban density development. The buffer of Applegate Park provides a forest use and physical buffer between the industrial park and the Fern Ridge Reservoir.

3. What other forest uses are adjacent to the property?

No other commercial forest uses are adjacent to the property. Windbreaks, aesthetic buffers and the park area all provide a forest type environment that the city anticipates will be maintained to the north of the Tanglewood Park.

4. Goal 2 Exception Standards.

Goal 2 issues of need, compatability, alternate sites, environmental, economic, social and energy impacts are thoroughly discussed in the previous Goal 3 exception discussion. The substantive issues discussed under Goal 3 exceptions apply to Forest Lands as well as agricultural lands.

Conclusion.

Based upon the foregoing analysis, the City is compelled to conclude that an exception to Goal 4, Forest Lands is justified and that the urban growth boundary be extended to include the Tanglewood Park. The city further concludes the property is needed for and committed to urban type uses and that the Tanglewood site best fits Veneta's needs for additional industrial and commercial lands.

D. Goal 5 - Open Space, Scenic and Historical Areas, and Natural Resources.

Goal 5 requires that the City of Veneta and Lane County inventory and protect scenic areas, open space, watersheds, and natural resources. The Tanglewood Park site is not identified as a protected resource in either the Veneta or Lane County Comprehensive Plans.

Adjacent to Tanglewood Park is federally-owned Applegate Park and Fern Ridge Reservoir. Applegate Park is identified by Lane County as an open space park area. It will be preserved as park land. Development of the Tanglewood Industrial Park will occur in compliance with performance standards specified in the Veneta Land Development Ordinance. As part of the site review process, the city will evaluate each building proposal to determine that noise, odor, water and solid waste discharges are limited or

controlled to prevent any damaging environmental effects on the park lands to the north. The City concludes that the Tanglewood proposal complies with Goal 5 insofar as it is applicable.

E. Goal 6 - Air, Water and Land Resource Quality.

The Tanglewood Park must comply with environmental quality standards of the State of Oregon and City of Veneta. Reviews of development will follow state and city standards. The City concludes that the Tanglewood proposal complies with Goal 6 insofar as it is applicable.

F. Goal 7 - "Areas Subject to Natural Hazards":

Goal 7 may apply to the north edge of the property adjacent to the Fern Ridge Reservoir. Goal 7 requires that developments subject to damage or that could result in loss of life due to natural hazards shall not be planned in the community in areas known as having potential natural hazards. In planning for flood plain areas, land uses that will not require dams, dikes, and levies should be preferred over uses that will require such protection. Appropriate safeguards should be provided to avoid negative environmental impact.

The north edge of the Tanglewood property is located along the 378' elevation line. The Army Corps of Engineers has identified the 378' elevation as the high water line for Fern Ridge Reservoir. Approximately one acre along the westerly border of the property is included in the revised FEMA Flood Plain map for the city. No structures are proposed to be located on this portion of the site. Soils are Alvadore loam and Veneta loam. Construction limitations are minimal due to the soil's high compressibility. Approval of the amendments will not violate Goal 7 because the City's Land Development Ordinance, together with the requirements of the adopted Storm Drainage Study (Exhibit 9) and FEMA Flood Insurance Study (Exhibit 10) will insure that appropriate safeguards will be taken.

G. Goal 9 - Economy of the State.

Goal 9 requires cities to plan for economic growth and diversification. The previous discussion under Goal 2 identifies the extensive economic inventory

work the City of Veneta has completed since 1980 and previous discussion under Goal 3, Goal 2, Part II-Exceptions documents the city's needs.

Goal 9 also requires the city to base its plan on the economic health of the area, labor market factors, current market forces in existing industries and availability of land. The city is then to use the information gathered to calculate its industrial and commercial land needs. The city has completed this task through its 1983 Buildable Lands Inventory, (Exhibit 11) and the findings related to that inventory are set forth at pp. 19-26 above. The City incorporates those findings here in support of its conclusion that Goal 9 is complied with. The City has the further responsibility to inventory, plan, and zone suitable alternative sites to accommodate the identified needs. In so doing the city may allocate more land than is strictly (mathematically) needed to provide some choice in the marketplace for potential commercial and industrial development.

The unamended Veneta Comprehensive Plan does not adequately address Goal 9. The acknowledged version of the plan states that the City shall develop an economic component prior to the next plan update in late-1983.

Since acknowledgment, however, the City has prepared the University of Oregon (Exhibit 2) and Pacific Economica (Exhibit 4) studies to provide the city with base data and strategies for improving the local economy. The State Department of Economic Development has assisted the City in addressing the City deficiency in planning for economic development by designating Veneta as an Economically Lagging Area making the community eligible for investment tax credits for industrial developers.

The findings relating to need set forth in this documents consideration of a Goal 2, Part II exception for LCDC Goals 3 and 4 are incorporated herein by reference. The revised buildable lands inventory accurately reflects the City's "need" responsibilities under Goal 9 and are adopted as findings pursuant to this Goal 9 analysis. The City concludes that the Tanglewood proposal complies with Goal 9.

H. Goal 10 - Housing.

The 1979 and 1983 Buildable Lands Inventories show that the Phase I and U.G.B. areas have sufficient lands identified for residential development to serve the City's

projected population in excess of 7,500 persons. The addition of the Tanglewood Industrial Park will not require allocation of additional residential lands.

Goal 11 - "Public Facilities:

This goal requires the City to develop plans for the timely, orderly and efficient arrangement of public services and facilities allowing proper conversion of lands to urban uses. Public facilities, such as water, sewer, streets, parks, drainage and fire protection must be coordinated with proposals for development.

As part of this application, the City has considered the impact that an extension of the Urban Growth Boundary (UGB) will have on the city's ability to provide needed public facilities.

Water: The Veneta Water Facilities Plan (1979) provides a 20-year master plan for water system improvements. The City has recently completed the majority of Phase I, Priority 1 improvements with exception of well development and has upgraded its fire insurance rating to "5".

The proposed site is adjacent to Jeans Road (10" main) and Territorial Road (16" main). Fireflows at Highway 126 and Territorial Road show an available fireflow of 4,000 gpm. Approximately 3,000 to 4,000 gpm is needed to serve developments such as that proposed.

Storage and Pump Station capacity are adequate to service new development areas within the Urban Services Boundary. However, an engineering analysis of water main capacities and fireflows will be required of any new developments.

Sewer: The Veneta Sewer Plan (1970) provides an overall plan for sewer improvements. The City has varied from the plan by purchasing 78 acres of land on the west side of the city for a second lagoon site and installed a spray irrigation system in June 1983.

The Jeans Road lift station is designed to service the western half of the Tanglewood site plus other developments on Jeans Road and Highway 126. Additional pump station facilities are required to service the east side of the proposed site. The applicant has planned for construction of this pump station during Phase I development. The burden of installing required pump station facilities and collection systems will be on the developer.

Streets: The City transportation component of the Comprehensive Plan identifies Jeans Road as a secondary arterial. Lane County has included Jeans Road street improvements in the Lane County "Aid to Cities" program in their 5-year capital improvements program. This street will require upgrading from 24' pavement width to 44' pavement width. The applicant has received access permit authorization onto Highway 126 from the Oregon Highway Division.

Drainage: The City Engineer has completed, and the City Council has adopted, a master storm drainage plan for the City. (Exhibit 9). The proposed developments on the Tanglewood site must comply with this plan.

Capital Improvements Plan: The City has adopted a Capital Improvements Program to upgrade public facilities. The proposed light industrial and commercial development will impact this program by requiring the City to allocate resources for additional future sewage treatment, water and street improvements to serve those areas impacted by the specific development. As demonstrated in Section III of this Report, the Plan has been amended where necessary to reflect recent improvements in the City's public facilities and services.

The City concludes that the Tanglewood proposal complies with Goal 11.

K. Goal 12 - Transportation.

Provision of a safe, economical transportation system is encouraged by goal 12. The Tanglewood Park location has excellent access to Highway 126 via Jeans Road. The transportation element of the Veneta Comprehensive Plan identifies Jeans Road as a secondary arterial. As detailed in Goal 11 findings, improvements to each of these roads are programmed.

The City concludes that the Tanglewood proposal complies with Goal 12.

L. Goal 13 - Energy Conservation.

Development of the Tanglewood Industrial Park site will encourage conservation by creating job opportunities in the Veneta area, encouraging infill of vacant lands near Veneta's core and targeting development near existing roads and bus routes.

The City concludes that the Tanglewood proposal complies with Goal 13.

M. Goal 14 - "Urbanization":

Goal 14 requires the City to plan for an orderly transition of rural lands to urban uses. The City's Urban Growth Boundary (UGB) serves as a division line separating urbanizable lands from committed rural lands. The extension of the UGB will add approximately 61 acres of commercial and light industrial lands to the City.

In this case, the current UGB is a section line which divides the Tanglewood property north-south. The applicant proposes that the UGB be extended to the north to the shores of Fern Ridge Reservoir, a more natural boundary. If the city approves this amendment request, Lane County must consider and approve the UGB extension.

A decision to approve or deny the application must be based on compelling facts and reasons that the establishment factors of Goal 14 have been met. In addition, the City must show that no alternative sites within the acknowledged UGB can serve the needs identified.

With regard to these factors, the City finds as follows:

(1) Population Needs. The proposed site is not planned for residential development. Sufficient buildable lands (738 acres in city Rural Residential and Single Family Residential zones) are available within the City UGB to support residential land use needs during the city's 20-year planning period. Only 395 acres are needed to serve the City's population needs. (Exhibit 11 @ 10).

Extension of the UGB is not needed for residential development.

(2) Need for housing, employment and liveability? The proposed UGB extension is proposed to permit industrial and commercial development. The City incorporates its findings regarding need from the Goal 2, Part II exception taken to Goals 3 and 4 above, the 1983 Buildable Lands survey and Goal 9 findings here as justification for compliance with this criterion.

(3) Orderly, economic provision of public utilities: Extension of public facilities to the proposed site will be easily accomplished for water, streets, drainage and sewer in the western half of the site. Sewer service to the eastern half of the site will require installation of a sewer pump station.

The City's findings regarding Goal 11 are incorporated here as justification for compliance with this criterion.

(4) Efficiency of land uses within and on fringe of urban areas: The development of the site for industrial and commercial uses will maximize the efficiency of land uses in the urban area of the community.

Large lot commercial and industrial lands will be clustered north of the Southern Pacific Rail Road tracks adjacent to Highway 126 and Jeans Road. This will permit the city to maximize the use of existing streets, water, sewer, and drainage facilities which are designed and planned to accommodate such development.

The maintenance of a small rural residential area north of Jeans Road and south of Fern Ridge Reservoir is an acceptable alternative for development; however, it would not permit urban density type of development nor would it cluster employment opportunities in Veneta.

(5) Environmental, energy, economic and social impacts: The clustering of industrial and commercial areas in Veneta will have several distinct advantages for the community. Those advantages are discussed in the City's Goal 2, Part II-Exception findings above at criterion C. The City incorporates those findings here as justification for compliance with this criterion.

(6) Retention of Agricultural Lands/Forest Lands: The site is dominated by the following soils:

350 A Noti Loam	- CLASS IV soil
335 B Alvadore Loam	- CLASS II soil
360 B Veneta Loam	- CLASS II and III soils

The site has been cleared of most trees. Potential exists for Douglas Fir growth on the property if commercial forest uses could be developed.

An exception to Goals 3 and 4 was granted by Lane County at the time this land was committed to rural residential development in 1980. Construction of streets within the tract have further committed the lands to residential uses.

The City of Veneta finds that further urbanization of these lands will not negatively impact Goals 3 and 4 lands in the Veneta area. If anything, the designation of these lands for non-agricultural and non-forest uses support LCDC urbanization goals by focusing urban density development in cities where city services are readily available.

(7) Compatibility with nearby Agricultural Uses: Nearby agricultural uses are located to the east and related to residential uses. Small gardens, woodland areas and animal grazing are not of sufficient magnitude to constitute commercial agriculture as that term is defined by LCDC. These lands are not presently used for commercial agriculture. Other adjacent lands to the south and west are within the City's UGB and are committed to urban density development. The Fern Ridge Reservoir to the north is preserved as an open space area by the Army Corps of Engineers.

Based upon the facts and conclusions set forth and incorporated in the factors analyzed above, the City is compelled to conclude that the requirements of Goal 14 are complied with, such conclusion providing sufficient reason to approve expansion of the Veneta urban growth boundary.

In an official phone communication from Greg Winterowd, Field Representative from LCDC assigned to Veneta, Mr. Winterowd informed City Administrator David Kinney that the proposed Tanglewood Park proposal, Buildable Lands Inventory and Findings Report comply with LCDC goals and is acceptable to the Dept. of Land Conservation and Development. Mr. Winterowd suggested that the City make editorial changes to the Buildable Lands Inventory prior to final adoption of Ordinance No. 255. The proposed changes will not affect the substance, methodology, policies and conclusions of the Buildable Lands Inventory or Findings Report. (Phone Conversation between Greg Winterowd, DLCD Staff, and David Kinney, City Administrator on July 21, 1983.)

VII. CONCLUSION

Based on the foregoing findings dated July 21, 1983 the Veneta City Council determines that the proposed light industrial and commercial development of Tanglewood Park, initiated by Tanglewood Park Enterprises, Inc. and Mr. C. Russell Ross does comply with LCDC Goals and Guidelines and the Veneta Comprehensive Plan.

Now, therefore, the Veneta City Council hereby approves the proposed land use application of Mr. C. Russell Ross and Tanglewood Park Enterprises, Inc. as presented in the following Attachments:

- I. Amendments to Plan Text
- II. Amendments to Plan Maps
- III. Amendments to Zoning Map

and the City Council hereby adopts this Background Report and Findings, including all exhibits submitted to the City of Veneta during this proceeding.

Further, the Veneta City Council finds on this 21st day of July, 1983 that the applicant has complied with all requirements of LCDC Goals and Guidelines and the Veneta Comprehensive Plan and the City Council hereby grants approval to CP-1-83, Veneta Comprehensive Plan Amendments and Veneta Land Development Ordinance Amendments.

ADOPTED this 21st day of July, 1983.

Frank Faust

ATTEST:

Sheryl Hackett, Secretary

David Kinney, City Administrator

LIST OF ATTACHMENTS

I. Amendments to Plan Text

- a. Light Industrial Goals, Policies and Narrative
- b. Industrial-Commercial Goals, Policies and Narrative
- c. Commercial Goals, Policies and Narrative
- d. Buildable Lands Inventory, July, 1983
- e. Minor Plan Amendments for Purposes of Updating Plan Text where justified by changes in fact or policy and where required to ensure internal plan consistency and factual accuracy as a result of amendments a. through d. above.
- f. Storm Drainage Study

II. Amendments to Plan Map

The Map Amendments reflect the following changes in the Comprehensive Plan:

- a. Light Industrial: Addition of 54.67 acres to plan designation
- b. Commercial: Addition of 15.80 acres to plan designation
- c. Urban Growth Boundary (UGB) Extension
- d. Urban Services Boundary (USB) Extension

III. Amendments to Zoning Map

The Map Amendments reflect the conversion of 9.49 acres from General Residential (GR) and Rural Residential (RR) to Light Industrial on the north side of Jeans Rd.

EXHIBIT LISTExhibits

1. 1979 Site Plan of Tanglewood Park Subdivision prepared by Schaudt, Stemm & Walter, Inc.
2. Economic Analysis: Veneta and Surrounding Area (Dept. of Urban Planning, University of Oregon June, 1980) 80 pages and "Summary Report", 6 pages.
3. Goals of Veneta Economic Development Committee (City of Veneta, September, 1980, 15 pages.
4. Economic Improvement Strategy Report and Related Correspondence. (Pacific Economica, Inc. for City of Veneta, January to March, 1981) 22 pages.
5. Veneta Industrial Site Analysis (Dept. of Urban Planning, University of Oregon, August, 1982 as revised by City of Veneta, June, 1983.
6. An Audit of Lane County, Oregon (The Fantus Company, prepared for the Lane County Economic Foundation, April, 1982) 137 pages.
7. Industrial Screening and Target Industry List (The Fantus Company, prepared for the Lane Economic Foundation, April, 1982), 6 pages.
8. Lane County Oregon Factbook (Oregon Pacific Development Corporation, April, 1983), 83 pages.
9. Storm Drainage Study: City of Veneta (Schaudt, Stemm and Walter, Inc., June, 1982), 53 pages.
10. Flood Insurance Study: City of Veneta, OR (Preliminary Report) (Federal Emergency Management Agency, January, 1982) 16 pages + maps: City of Veneta Appeal to FEMA and Engineer's Report on the Flood Plain of the Long Tom River for City of Veneta (Ray Walter Engineering, Inc., June 8, 1983), 8 pages.
11. City of Veneta Buildable Lands Inventory, July, 1983.
12. Revised Text of Industrial-Commercial Plan Designation: Goals, Policies and Narrative.
13. Proposed Text of Light Industrial Plan Designation: Goals, Policies and Narrative.
14. Revised Text of Commercial Plan Designation: Goals, Policies and Narrative.
15. Veneta Comprehensive Plan, July, 1982 Edition referenced as "Unamended Plan"
16. Tanglewood Park: A Community Shopping Center and Industrial Park Development (Land Planning Consultants for Tanglewood Park Enterprises, July, 1983) (Also Applicant's Item 24).
17. Analysis of Buildable Lands Inventory (Robinette, Cleveland, Williams and Gebhardt, Attorneys at Law) July 14, 1983 and Working Paper: Population for Lane County Comprehensive Plan, Lane County, August, 1981.