

FILED
IN THE BOARD OF COUNTY COMMISSIONERS OF LANE COUNTY, OREGON
AT _____ O'CLOCK _____ M

JUN -2 1983

) IN THE MATTER OF ADOPTING AN
) AMENDMENT TO THE TEXT OF THE
) 1990 PLAN, A COMPONENT OF THE
) COMPREHENSIVE PLAN FOR LANE
) COUNTY (PA 82-185)

ORDINANCE NO. 878
For Lane County, Oregon
BY Patricia Sitter
DEPUTY

WHEREAS, the Board of County Commissioners has received a resolution from the Lane County Planning Commission dated 4-12-83 (LCPC 83-1), of record herein, recommending approval of an amendment to the text of the 1990 Plan; and

WHEREAS, the Board of County Commissioners has received and considered the proposed amendment, public testimony and correspondence relating thereto; and

WHEREAS, the Board of County Commissioners has performed its public hearing and other duties in accordance with applicable law; now, therefore,

THE BOARD OF COUNTY COMMISSIONERS OF LANE COUNTY ORDAINS AS FOLLOWS:

1. That the following language for the text of the 1990 Plan to constitute a recommendation #7 on Page 24 of the Plan:

"7. The Staffordshire mobile home development is located in an area generally designated in this plan for agricultural use. Because of prior approvals and because the development exists, it shall be permitted to continue through application of appropriate zoning. However, the development shall not be expanded beyond the 131 units currently approved." is **ADOPTED**.

2. That the accompanying Exception (as described in the attached Findings of Fact and Conclusions) to LCDC Goal #3 (Agriculture) affecting the Staffordshire mobile home development is **ADOPTED**, and incorporated as an amendment to the 1990 Plan.

In support of this Ordinance, the Board adopts as its findings those contained in Exhibit "B", Findings of Fact and Conclusions of Law for Staffordshire Plan Amendment and Zone Change attached hereto, however, not part of this Ordinance.

ENACTED this 25th day of May, 1983.

Lerald H. Rust, Jr.
Chairman, Board of County Commissioners

APPROVED AS TO FORM
DATE 5/11/83
William
OFFICE OF LEGAL COUNSEL

Chickie
Recording Secretary for this Meeting of the Board

After public hearing on April 12, 1983, the amendment cited in the hereinabove Ordinance was considered by the Lane County Planning Commission and recommended for approval.

Roy L. Burns
Secretary, Lane County Planning Commission

MEMORANDUM

TO: Board of County Commissioners DATE: 5/4/83
 FROM: Roy Burns & Jim Mann, Planning Division/Public Works Department
 SUBJECT: Amendment to 1990 Plan Text with Goal 2 Exception to Recognize the
 Staffordshire Mobile Home Development and Allow Appropriate
 Zoning. (PA 82-185)

A. INTRODUCTION

This property is located at 34621 Hwy. 58, about 1.5 miles east of I-5 and includes Map 18-02-19; Tax lot 2503 and a portion of 2400 and 2502. The site includes 113 acres with 23 mobile homes currently on site and approvals for a maximum of 131 units on file. The site is called Staffordshire Mobile Estates. The developers have requested an amendment to the 1990 Metro Plan which would recognize the committed nature of this development as a conforming use. The plan now designates the property as agriculture.

B. HISTORY OF ACTION

AGT zoning for subject property was originally applied in 1965. The 1990 Plan for the area was subsequently approved in 1972. The Board granted CUP 72-143 in early 1973 allowing an 81 space mobile home park and 18 hole golf course for this site in the AGT zone. This approval was modified by the Board in 1980, eliminating the golf course but allowing expansion to 131 units.

The Board authorized initiation of this plan amendment request on 8-18-82. A request for plan text amendment and rezone from AGT to RA/MH were then filed for this site on 8-30-82 (PA 82-185 and PZC 82-188). The Lane County Planning Commission postponed these requests from 10-12-82 to 4-12-83 at which time a resolution was unanimously passed recommending approval of the 1990 Plan Text Amendment as proposed to the Board. The Planning Commission also approved the requested rezone via Order of Intent to Rezone.

C. PROPOSAL AND ANALYSIS

The applicants desire to subdivide the existing mobile home park into a mobile home subdivision, however, the 1990 Plan diagram designates this site as "Agriculture". This plan designation allows rural uses (at an average density of 5 acres) provided nonconflict with agricultural uses is shown. In the use of the applicants land division intent, the 5 acre density requirement of the 1990 Plan would not allow this proposal without a plan amendment.

The applicant's plan amendment request consists of a modification to the 1990 Plan text adding a recommendation #7 to go onto Page 24 of the Plan. That text addition is shown as Exhibit A and basically states a recognition of the County's prior approvals for Staffordshire and that appropriate zoning be allowed enabling the development to continue up to the 131 unit level previously approved.

The application provided findings (see Exhibit B) to justify plan and Statewide Planning Goal conformity.

Regarding the 1990 Plan and County Goals and Policies, the application cites several goal provisions calling for infilling of existing residential sites and allowing for development of + one acre densities with an acceptable community water system (which already exists on site).

Of the Statewide Planning Goals, Goal #3 (Agriculture) is most applicable. The proposed findings (Pages 7-14) addressed the committed/built upon criteria as part of the Goal #2 exception process to Goal #3 and clearly show the site to be much improved with the existing mobile home park in place.

In conclusion, the Lane County Planning Commission and staff have examined the proposed findings and believe these adequately show plan and goal conformity for the proposal. Board approval of the amendment is recommended.

D. ATTACHMENTS/EXHIBITS

- 1. Vicinity Map*
- 2. LCPC Resolution 83-1*
- 3. Exhibit A - Text Amendment*
- 4. Exhibit B - Findings Document*

EXHIBIT A

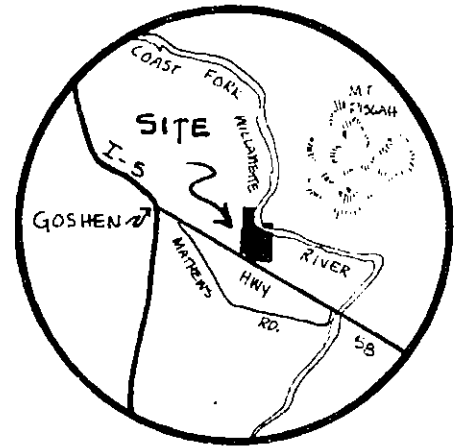
PA 82-185 proposed 1990 text amendment to be added as recommendation #7 on Page 24 of the Plan:

- "7. The Staffordshire mobile home development is located in an area generally designated in this plan for agricultural use. Because of prior approvals and because the development exists, it shall be permitted to continue through application of appropriate zoning. However, the development shall not be expanded beyond the 131 units currently approved."*

AREA MAP

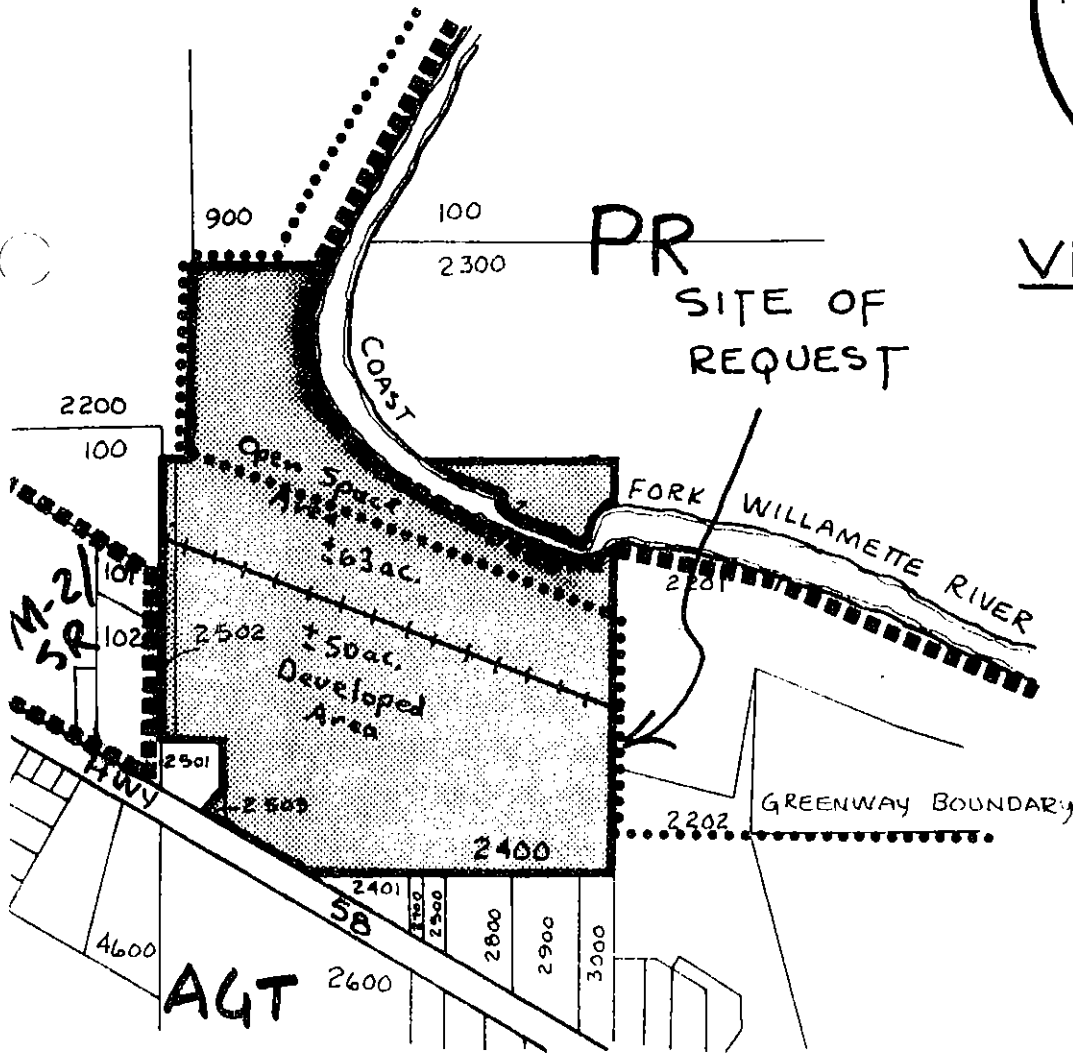
PA82-185

PZC82-188



VICINITY MAP

NO SCALE



IN THE PLANNING COMMISSION OF LANE COUNTY, OREGON

IN THE MATTER OF RECOMMENDING AND)
REPORTING ON THE PROPOSED TEXT)
AMENDMENT TO THE EUGENE-SPRING-)
FIELD METROPOLITAN AREA 1990)
GENERAL PLAN, A COMPONENT OF THE)
COMPREHENSIVE PLAN FOR LANE)
LANE COUNTY, INVOLVING THE)
STAFFORDSHIRE PROPERTY (PA 82-185)

RESOLUTION LCPC 83-1

WHEREAS, Chapter 12, Lane Code establishes procedures and criteria for amending the comprehensive plan for Lane County; and

WHEREAS, The Board of County Commissioners has requested our recommendation and report on the proposed text amendment to the Eugene-Springfield Metropolitan Area 1990 General Plan involving the Staffordshire property; and

WHEREAS, the Commission has held a public hearing and otherwise duly performed its duties;

IT IS HEREBY RESOLVED that the proposed text amendment to the Eugene-Springfield Metropolitan Area 1990 General Plan, including the Exhibits listed below, be forwarded to the Board of County Commissioners with a recommendation for approval:

Exhibit "A": Text of proposed amendment.

Exhibit "B": Findings of Fact and Conclusions of Law supporting approval of the text amendment to the Eugene-Springfield Metropolitan Area 1990 General Plan involving the Staffordshire property.

FURTHER, the Secretary of the Planning Commission is hereby directed to prepare a report of our proceedings to accompany this Resolution and to deliver the Resolution and the report to the Board of County Commissioners forthwith.

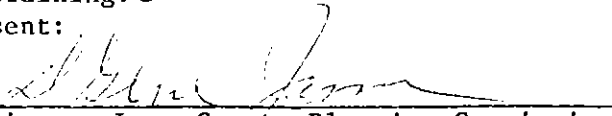
Meeting of April 12, 1983

Ayes: 5

Nays: 0

Abstaining: 0

Absent:


Chairman, Lane County Planning Commission

In the Matter of Recommending and Reporting on the Proposed Amendment to the Eugene-Springfield Metropolitan Area 1990 General Plan, A Component of the Comprehensive Plan for Lane County, involving the Staffordshire Property (PA 82-185)

EXHIBIT "B"

FINDINGS OF FACT AND CONCLUSIONS OF LAW

FOR

STAFFORDSHIRE PLAN AMENDMENT AND ZONE CHANGE,

34621 Highway 58, Eugene, Oregon

[18-02-19 Tax Lots 2400, 2502 and 2503]

BEFORE THE PLANNING COMMISSION FOR THE COUNTY OF LANE

In Re:)	
)	
STAFFORDSHIRE PLAN AMENDMENT)	
AND ZONE CHANGE,)	
)	FINDINGS OF FACT AND
34621 Highway 58, Eugene, Oregon)	CONCLUSIONS OF LAW
[18-02-19 Tax Lots 2400, 2502)	
and 2503])	
)	

The following discussion represents the findings of fact and conclusions of law attendant to the decision of the Planning Commission of Lane County in the above-captioned matter. References given in parentheses refer to the documents which have been compiled and identified as the record of this proceeding through January 11, 1983.

I. Location and Description of Property

The Staffordshire Mobile Home Development is located at 34621 Highway 58, Eugene, Oregon. The development is located on the north side of Highway 58, approximately 1.5 miles east of the I-5 Freeway. The subject property is described as Tax Lots 2400, 2502 and 2503 of Section 19, Township 18 South, Range 2 West, Willamette Meridian, Lane County, Oregon. A detailed legal description is found in Exh. A of the Plan amendment and rezoning application, dated August 27, 1982 (hereinafter referred to as "application").

The subject parcel is approximately 55 acres in size and the total site ownership is approximately 113 acres. Existing structures on the subject property include 23 mobile homes and accessory structures, a swimming pool, recreation building, pump houses, office and gate house.

II. Background of Application

The Staffordshire Mobile Home Development was initially approved as a conditional use permit by the Lane County Board of Commissioners on January 17, 1973 (CUP 72-143). That conditional use permit involved development of a mobile home park consisting of 81 spaces, an 18-hole golf course, a clubhouse, swimming pool and other accessory improvements.

On September 10, 1980, the Lane County Board of Commissioners approved a modification to the original conditional use permit

(Board Order No. 80-9-10-3). The modification deleted the 18-hole golf course from the development and increased the number of spaces permitted in the mobile home park from 81 to 131.

The applicant is Mr. Bob Harrison, Vice President of American Park Investments, dba Staffordshire, 895 Country Club Road, Suite C-200, Eugene, Oregon. The applicant has installed certain improvements required to accommodate the expanded number of mobile home spaces, subsequent to approval in 1980 of the modified conditional use permit. The original mobile home park was served by a community water system. In order to expand the system's capacity to properly serve the additional spaces, a second well was installed in 1981 at a cost exceeding \$25,000. Testing of the second well was completed on November 13, 1981. A pump house has been constructed subsequent to completion of the testing. (Application at 1.)

The applicant seeks permission to convert the mobile home park to a mobile home subdivision. The property upon which the mobile home park is situated is zoned AGT. Mobile home parks are permitted as a conditional use in Lane County's AGT zone. However, mobile home subdivisions are not permitted in said zoning district, and rezoning is necessary to permit subdivision of the development. The proposed Plan amendment and rezoning will permit subdivision of the mobile home development previously approved under CUP 72-143 and Board No. 80-9-10-3. Approval of this application will not result in any increase in the number of spaces already approved.

The applicable Comprehensive Plan is the Eugene-Springfield Metropolitan 1990 General Plan (hereinafter referred to as "1990 General Plan"), which was adopted by the Lane County Board of Commissioners on March 29, 1972 (Board Order No. 62-3-29-9). This application has been treated as a concurrent request for Plan amendment and rezoning. Lane Manual 12.105 through 12.120 permits consideration of Plan amendments and the action is authorized by the Board of County Commissioners. The Board authorized initiation of this Plan amendment on August 18, 1982, directing the Planning Commission to consider the Plan amendment in conjunction with the rezoning of the subject property.

The applicant and present occupants of Staffordshire have conducted extensive negotiations, which have culminated in an agreement approving the present application, subject to certain conditions intended to protect the respective rights of the applicant and present residents. In particular, the applicant has agreed to construct, at its own expense, a lighted, chain-link fenced, resident-only, key-locked recreational vehicle parking lot and a paved Highway 58 turn-out lane, to engineer and construct drainage ditches in accordance with flood plain management and Lane County requirements and to limit the subdivision to not more than 131 single-family lots.

COMPREHENSIVE PLAN AMENDMENT

III. Local Standards Applicable to Comprehensive Plan Amendment

The Planning Commission has applied the following standards in evaluating this Comprehensive Plan amendment:

- (1) Lane Code Section 12.050(2), which sets forth findings required to justify an amendment to the Comprehensive Plan;

- (2) The amendment must be consistent with the unamended portions of the Comprehensive Plan;
- (3) The amendment must be consistent with plan goals and policies addressed to change and development; and
- (4) The amendment must be consistent with the State-wide Planning Goals.

A. Lane Code Section 12.050(2)

Lane Code Section 12.050(2) states that:

"The Board may amend or supplement the Comprehensive Plan upon a finding of: (a) an error in the plan; or (b) changed circumstances affecting or pertaining to the plan; or (c) a change in public policy or (d) a change in public need based on a re-evaluation of factors affecting the plan."

The Comprehensive Plan applicable to the subject property is the 1990 General Plan. The diagram of the 1990 General Plan generally designates the area for agricultural use. The text of the 1990 General Plan includes the following description of the agricultural designation:

"Primarily reserved for agriculture and related activities, some localized areas within may be considered as 'rural' provided they do not conflict with adjoining agriculture uses."

Findings. There have been changed circumstances affecting or pertaining to the 1990 General Plan, as well as certain changes in public policy. At the time the 1990 General Plan was adopted in March of 1972, the Staffordshire Mobile Home Development did not exist. The development's first phase proceeded under the conditional use permit granted in January of 1973, while development of the second phase is now occurring under the conditional use permit approved in September of 1980. In both 1973 and 1980, the Board of County Commissioners determined that approval of the mobile home development was consistent with the Comprehensive Plan. Development has since occurred in reliance upon those approvals.

The development of Staffordshire Mobile Home Park represents a change in circumstances subsequent to adoption of the 1990 General Plan in 1972. Development has occurred in reliance upon Lane County's determination that a mobile home park on the subject property is consistent with the Comprehensive Plan. In view of said determination and the subsequent development, it is appropriate to amend the 1990 General Plan to recognize the existing situation.

The 1990 General Plan was adopted prior to adoption of any of the County's subarea plans. In the various subarea plans subsequently adopted by the County, rural residential development at an average

density of one dwelling unit per acre is permitted in certain circumstances, e.g., where a community water system is available. Approval of residential development at that density represents a policy change from the 1990 General Plan's standard requiring average density of one dwelling unit per five acres for rural residential development, regardless of the availability of a community water supply system.

The 1990 General Plan has been retained as an interim plan for certain areas, including the area surrounding the Staffordshire Development. Boundaries of the subarea plans will be expanded to include those portions of the metropolitan area which were included under the 1990 General Plan, but excluded under the Metropolitan Area General Plan adopted in 1980 and readopted in February of 1982.

Conclusions. Based on the above findings, we conclude that substantial changes in circumstances and public policy warrant approval of an amendment to the Comprehensive Plan in accordance with Lane Code Section 12.050(2). The County has indicated its intent to include the subject property within the boundaries of a subarea plan at some time in the future, and the standards for rural residential developments provided in the subarea plans differ from those found in the 1990 General Plan, representing a change in public policy.

B. Consistency with Unamended Portions of Plan

Findings. The 1990 General Plan's purpose is described, at page 2 of the plan, as follows: "The General Plan is oriented to deal with large-scale, persistent, area-wide problems that beset the metropolitan area." The 1990 General Plan does not require elimination of development which has already occurred. The Staffordshire Development exists by virtue of prior County approval, and its continued existence is consistent with the 1990 General Plan.

Although the 1990 General Plan diagram designates the Staffordshire area for agricultural use, the plan text specifically recognizes that certain localized areas within a general designation may be considered rural, provided the rural areas do not conflict with adjoining agricultural uses. Specific findings at p. 10 of Section IV infra, demonstrate that the Staffordshire Development does not conflict with adjoining agricultural uses.

The Staffordshire area is still governed by the 1990 General Plan because no subarea plan has yet been adopted for the area. It is Lane County's intent to expand the non-metropolitan comprehensive plan to encompass this area at some point in the future. The policies contained in the subarea plans and in the proposed Comprehensive Plan recognize that rural residential development at an average density of one dwelling unit per acre is appropriate in certain circumstances. Specifically, such density is appropriate when a community water system is available. The Staffordshire development is served by a community water system. Approval of the present application would result in densities of slightly greater than 1 dwelling unit per acre, but we find such approval reasonable under the

circumstances, because of prior county approvals for development on the subject property and because the development is served by both a community water system and a community septic system.

Conclusions. We conclude that the proposed plan amendment is consistent with the express recognition of localized exceptions to an overall agricultural designation provided in the 1990 General Plan. We further conclude that the Staffordshire Development's density is consistent with the level of density now permitted under various subarea plans when a community water system is available.

C. Lane County General Plan Goals and Policies

- (1) The text of the Lane County General Plan Goals and Policies, adopted August 28, 1980, states, at P.2, that:

"The State-wide Planning Goals and the goals and policies of this plan limit substantial rural development. However, both documents recognize that such development may occur: (1) when a rural area is developed or otherwise committed to non-resource use; (2) as infill to existing committed or developed areas; or (3) when a valid exception is taken to applicable State-wide Planning Goals."

Findings. The findings set forth at pp.7-14, infra, relating to State-wide Planning Goal No. 2, establish that the Staffordshire Development is developed or otherwise committed to nonresource use. Said findings justify the taking of an exception to Goal 3.

Conclusions. The proposed plan amendment is consistent with the above-quoted statement from the General Plan Goals and Policies. The amendment permits continued use of an existing development on property which is developed or otherwise committed to nonresource use and for which an exception is taken to Goal 3.

- (2) Policy No. 9 (Land Use Planning, P.2) of the General Plan Goals and Policies states that the County should: "Encourage infilling of existing residential areas."

Findings. The Staffordshire Development is an existing, residential area now limited to mobile home park use. The proposed plan amendment and rezoning would permit the existing development to continue as a mobile home subdivision. Conversion to a mobile home subdivision will facilitate infilling of vacant lots within the development.

Conclusions. The proposed plan amendment will encourage infilling of an existing mobile home development consistent with Policy No. 9.

- (3) Policy No. 7 (Agriculture, P.3) of the General Plan Goals and Policies states that:

"Some agricultural land in Lane County is not suitable or available for agricultural use by nature of being built upon, committed to, or needed for nonagricultural uses. The County shall plan and zone such lands for nonagricultural uses by using the exceptions process of LCDC Goal 2, Part II."

Findings. Based on the Goal 2 findings set forth, infra, the property which is the subject of the proposed plan amendments is not available for agricultural use, because it is built upon and irrevocably committed to nonresource use. The application includes the analysis required by OAR 660-04-025, which satisfies the exceptions process of Goal 2, Part II.

Conclusions. Policy No. 7 requires application of nonagricultural plan and zoning designations to the subject property, because it is built upon or otherwise irrevocably committed to nonagricultural use.

Overall Conclusions. The proposed amendment to the 1990 General Plan is consistent with the pertinent portions of the Lane County General Plan Goals and Policies, which recognize the importance of maintaining and encouraging existing development.

IV. Application of State-Wide Planning Goals to Comprehensive Plan Amendment

An amendment to the Comprehensive Plan must be evaluated for conformity with applicable State-wide Planning Goals. Separate findings and conclusions for each of the applicable Goals are set forth below.

A. Goal 1 (Citizen Involvement)

Goal 1 requires that opportunity be provided for citizens to be involved in all phases of the planning process. The importance of citizen involvement in the instant case is further emphasized by OAR 660-04-025(2), which requires that residents of the affected area be involved when a conclusion is drawn that land is physically developed or built upon or irrevocably committed to nonresource use.

Findings. Notice of the public hearing on the plan amendment and rezoning was mailed to persons owning property within 300 feet of the boundary of the Staffordshire site. Said notice specifically stated that an exception through application of the built upon or irrevocably committed test would be considered by the Planning Commission. Notice of the public hearing was also prominently posted adjacent to the property and the present hearing was postponed to allow settlement negotiations to proceed and to allow the applicant to hear and address the concerns of affected residents, neighbors and interested citizens.

Conclusions. The notice of public hearing and the opportunity for public participation through the mechanism of public hearing before the Planning Commission and Board of Commissioners satisfy the requirements of Goal 1 concerning citizen involvement.

B. Goal 2 (Land Use Planning)

Goal 2, Part I requires that the County assure an adequate factual base for decisions and actions related to use of land and that actions related to land use be consistent with city and county comprehensive plans. Goal 2, Part II provides that:

"When, during the application of the State-wide Goals to plans, it appears that it is not possible to apply the appropriate Goal to specific properties or situations, then each proposed exception to a Goal shall be set forth during the plan preparation phases and also specifically noted in the notices of public hearing."

Findings. The Staffordshire Development is located upon property characterized by Class I-IV soils, which must be preserved for farm use under Goal 3, unless an exception is taken to the Goal. The following detailed findings demonstrate that it is not possible to apply Goal 3 to the Staffordshire Development, because it is physically developed or built upon or otherwise irrevocably committed to non-resource uses. The land area subject to the Goal 3 exception is shown on the map attached hereto as Exhibit "A".

The irrevocable commitment test first appeared in 1000 Friends of Oregon v. Marion County, LCDC No. 75-006, where it was stated:

"The rule requiring an EFU zone need not be applied to two categories of land: (1) lands which are already physically developed or built upon and no longer physically available for farm use; and (2) lands which are not built upon but which have otherwise been irrevocably committed to nonfarm uses." LCDC No. 75-006, at 2.

In 1000 Friends of Oregon v. Clackamas County, LUBA 80-060, it was stated, at p. 9, that ORS 215.203(2)(a) requires that the governing body consider all "reasonably possible" forms of agricultural uses before finding land to be committed. The test of commitment focuses on a specific showing of how activity on the subject property and on land surrounding the subject property prevents continued use for farming purposes. 1000 Friends of Oregon v. Clackamas County, supra, at 14, 16.

There is no precise test for commitment. LCDC stated in its Final Acknowledgment Order for Yamhill County that:

"The determination that some resource lands are irrevocably committed to nonresource uses and thus no longer available for farm or forest uses is not a precise technical or legal equation. It is a judgment call based upon certain required facts."

Further guidance for the level of detail required of commitment findings is found in LUBA's 1000 Friends of Oregon v. Clackamas County opinion. LUBA held that, at a minimum, a conclusion of irrevocable commitment to nonresource use must be based upon findings, supported by substantial evidence, that the subject land cannot now or in the foreseeable future be used for any of the purposes contemplated in Goals 3 and 4 because of one or more of the following criteria:

- (a) Adjacent uses;
- (b) Parcel size and ownership patterns;
- (c) Public services;
- (d) Neighborhood and regional characteristics;
- (e) Natural boundaries; and
- (f) Other relevant factors.

1000 Friends, supra, at 13-14.

A finding of irrevocable commitment should be a factual determination that a given area can no longer support any reasonably possible forms of agricultural or forest use as contemplated by Goals 3 and 4. LUBA's opinion in 1000 Friends of Oregon v. Clackamas County held that findings addressing one or more of the commitment criteria may be sufficient to establish irrevocable commitment of land to nonresource use and that it is not necessary that facts addressing a single commitment criterion, taken alone, be sufficient to justify a commitment exception. LUBA stated that:

"In certain situations the facts related to any one of the factors may by themselves justify a conclusion of irrevocable commitment. However, factors relating to the subject parcel itself cannot alone justify a conclusion of irrevocable commitment. Examples of factors which may by themselves justify such a conclusion are (a) adjacent uses and (b) parcel size and ownership patterns. The more common situation, however, will probably necessitate consideration of several, if not all, of the factors in combination."
1000 Friends, supra, at 14.

Individual findings and conclusions on each of the commitment criteria employed by LUBA are set forth below. The findings are based on written testimony submitted by the applicant at pages 7-10 of the Application.

(1) Physical Development of Subject Property

Findings. The Staffordshire Development consists of 131 mobile home spaces. Eighty-one spaces were developed pursuant to a conditional use permit approved by Lane County on January 17, 1973. Location of the 81 spaces approved in 1973 is shown on Exhibit "B" of the Application. A copy of the exhibit is attached hereto as Exhibit "B" and incorporated herein by reference.

The Staffordshire Development also includes 50 spaces now being developed pursuant to a conditional use permit approved Lane County on September 10, 1980. The location of the 50 spaces now being developed is shown on Exhibit "C" of the Application. A copy of the exhibit is attached hereto as Exhibit "C" and incorporated herein by reference.

Physical improvements on the subject property include:

- (a) A developed, private road system with a paving width of 36 feet serving the mobile home lots;
- (b) A community water system consisting of a well, pump house, storage facilities, back-up generator, distribution system and fire hydrants to serve the development. A second well and pump house was recently installed to increase the system capacity to accommodate additional development approved under the conditional use permit granted in 1980;
- (c) A community storm sewer system installed to serve the development;
- (d) Underground electrical, telephone and TV systems to serve the development;
- (e) Community septic system installed to serve the development (see Exhibits "D" through "F" of the Application, copies of which are attached hereto as Exhibits "D" through "F" and incorporated herein by reference);
- (f) A recreation building and swimming pool;
- (g) A street lighting system; and
- (h) Landscape screening improvements installed along the south and west borders of the property.

In addition to the community improvements described above, there are 23 mobile homes presently located in the development, including car-ports, storage buildings and other accessory structures.

The community septic systems are installed in the open space areas between lots and between the lots and the boundaries of the subject property, as indicated on Exhibits "D" through "F".

The Staffordshire Development is located on a site containing 113 plus or minus acres. Only the southern most 55 acres are physically developed and the northern 58 plus or minus acres remains as open space.

The 1973 conditional use permit for the Staffordshire Development was approved prior to enactment of the State-wide Planning Goals. The 1980 conditional use permit allowing expansion of the existing development was based upon a determination by the Board of Commissioners that the subject property is irrevocably committed to nonresource use. (Board Order No. 80-9-10-3).

In accordance with the requirements of OAR 660-04-025(4) and in reliance upon the above findings, the following statement of reasons supporting the exception is provided:

- (a) There are extensive physical improvements on the subject property, such as structures, streets, community water and septic systems, underground utilities, storm sewer systems and recreational improvements. The extent and location of the physical improvements make agricultural use of the southern portion of the site infeasible.
- (b) The open space areas between lots on the southern portion of the site are also unsuitable for agricultural use. The presence of the community septic systems precludes use of certain equipment and cultivation practices required for agricultural production. The areas are of insufficient size for use as commercially feasible agricultural units and the surrounding presence of residential dwellings precludes the use of standard farming practices, such as spraying or crop dusting.
- (c) The determination that the Staffordshire site is physically developed and irrevocably committed to nonresource use is limited to the southerly 55 plus or minus acres of the property.

Conclusions. A substantial portion of the southern 55 plus or minus acres of the Staffordshire site is physically developed or built upon. The remaining open areas are irrevocably committed to nonresource use because of the presence of community septic systems, surrounding residential dwellings, the limited size of the open space areas and the conflicts between residential use and standard farming practices. Extensive development establishes that the site is irrevocably committed to nonresource use and that an exception to Goal 3 is justified as to the southern 55 plus or minus acres. The major portion of this development occurred pursuant to Lane County's approval of an 81-space mobile home park prior to enactment of the State-wide Planning Goals.

(2) Adjacent Uses

Findings. The predominant uses on parcels adjacent to the subject property are rural residential dwellings on small acreages, home-occupation commercial uses, a few large acreages, either vacant or under cultivation, and commercial and industrial uses. Immediately east of the subject property along Highway 58 is the Stafford residence, beyond that a residence used, in part, as Carrie's Antique Shop (see photos 1 and 2 submitted with Application), and beyond that, several single family dwellings on parcels less than 5 acres in size fronting on the north side of Highway 58. A large undeveloped parcel owned by the Oregon Highway Division lies to the northeast of the subject property. The 58 plus or minus acres owned by the applicant and remaining as open space lie directly north of the subject property

and they are bounded on the north by the coast fork of the Willamette River. To the west of the subject property is another residential dwelling owned by the Stafford family and used, in part, as an Agricultural and Water Services business. (See photo 3 with Application). Continuing west beyond the Stafford residence along Highway 58 are a truck tire repair business, Conde's Redwood Lumber, an office building and a home-occupation custom welding and auto repair shop (see photos 4-7 submitted with Application). Immediately south of the subject property, across Highway 58, is a 60-acre parcel owned by Cone Lumber Company, a parcel developed with stables and pasture and, to the west, Sutherlin's Market (see photo 8 submitted with Application).

Conclusions. The findings indicate that the subject property is surrounded by a variety of uses, chief among them being rural residential dwellings on small acreages, home-occupation businesses and commercial establishments. The findings demonstrate that the Staffordshire Development is not an isolated phenomenon in the area, but that it is located in an area where there exists a substantial amount of rural residential and commercial development of a nature which serves and is complimentary to the rural residential use.

(3) Parcel Size and Ownership Patterns

Findings. Property to the south and east of the Staffordshire Development is located in Section 19, Township 18 South, Range 2 West. There are three large ownerships in the section: (a) the Staffordshire site consisting of 113 acres; (b) Oregon Highway Division ownership consisting of 332.79 acres, and (c) 60-acre parcel owned by Cone Lumber Company. The Oregon Highway Division land is located north and east of the Staffordshire site and the Cone ownership is located south of Highway 58. A map of Section 19, showing parcelization and the primary ownerships, was submitted as Exhibit "G" with the Application. A copy of the map is attached hereto as Exhibit "G" and incorporated herein by reference.

The land in Section 19, exclusive of the three ownerships referred to above, is divided into 52 parcels. The size ranges of the 52 parcels are set forth below:

- (i) 0.00-1.00 acres - 15 parcels (29%)
- (ii) 1.01-5.00 acres - 29 parcels (56%)
- (iii) 5.01-10.00 acres - 6 parcels (11%)
- (iv) 10.00+ acres - 2 parcels (4%)

The 52 parcels described are in 42 different ownerships. Forty-nine of the parcels are developed with either a single family residence or a mobile home and one parcel is developed with a convalescent home. Four of the parcels are vacant. A chart stating size, ownership and development of the 52 parcels located in Section 19 was submitted as Exhibit "H" with the Application. A copy of the chart is attached hereto as Exhibit "H" and incorporated herein by reference.

Property west and southwest of the Staffordshire site is located in Section 24, Township 18 South, Range 3 West. Property in Section 24 located west of the site and between Highway 58 and Martin Drive (County Road No. 95) is divided into 46 parcels, which are in 40 different ownerships. Forty-one of the parcels are developed with residences or commercial structures, including an office structure located immediately west of the Staffordshire development. The size ranges of the parcels are set forth below:

- (i) 0.00-1.00 acres - 21 parcels (45%)
- (ii) 1.01-5.00 acres - 16 parcels (35%)
- (iii) 5.01-10.00 acres - 5 parcels (11%)
- (iv) 10.00+ acres - 4 parcels (9%).

Detailed information concerning size, ownership and development of this portion of Section 24 is set forth in Exhibits "I" and "J", which were submitted with the Application. Copies of those exhibits are attached hereto and incorporated herein by reference.

The pattern of parcelization and development surrounding the Staffordshire site has existed for a number of years and occurred prior to enactment of the State-wide Planning Goals.

Conclusions. Extensive parcelization and rural residential development in the area immediately surrounding the subject property, when considered in conjunction with the existing development of the Staffordshire site as a mobile home park, render the subject property unsuitable and unavailable for agricultural use.

(4) Public Services

Findings. The Staffordshire mobile home development is located on the north side of Highway 58 about 1.5 miles east of the I-5 Freeway. The site is developed with a private road system, a community water system, a storm sewer system, a community septic system, a private street lighting system and underground electrical, telephone and TV systems. All of these systems are adequate to serve the development's present and future needs. Neither a public water supply nor a public sewer system are required for the site when fully occupied by 131 residential units.

The subject property is located in the Goshen Fire District and in the Pleasant Hill School District No. 1. Electricity is available from Pacific Power & Light and from the Emerald Public Utility District. The site is served by Pacific Northwest Bell Telephone Company.

A left-turn lane will be constructed at the entrance to the Staffordshire site from Highway 58 to improve ingress and egress. The applicant has posted a bond to guarantee construction of said improvement.

Conclusions. Approval of the Comprehensive Plan amendment will not appreciably increase the need for public services to the area.

The development is and will continue to be served by a community water system, community septic system and community storm sewer system. All necessary utilities are in place, and the applicant has guaranteed construction of a left-turn lane from Highway 58 to reduce any potential traffic hazard at the entrance to the site.

(5) Neighborhood and Regional Characteristics

Findings. The Staffordshire site is located on the north side of Highway 58, about 1.5 miles east of the I-5 Freeway and about seven miles south of Eugene. The predominant land use pattern in the area surrounding the subject property consists of residential dwellings on small rural lots interspersed with home-occupation businesses, commercial and industrial establishments and large acreages, both undeveloped and under cultivation. The area on the north side of Highway 58 has been designated for agricultural use on the 1990 General Plan, with the exception of a strip of Light-Medium Industrial land to the northwest of the Staffordshire site. The area south of Highway 58 has been designated for rural use.

Three other mobile home developments are located north of the Staffordshire site; the Oaks Mobile Home Park and Gooden's Trailer Court, both on Seavey Loop Road, and the mobile home subdivision developed by Albert Allen immediately east of the I-5 Freeway and the Willamette River. (See, the photos numbered 9-11 submitted with the Application.)

The community of Pleasant Hill is located about three miles southeast of the Staffordshire site on Highway 58. The community has, among other businesses, an IGA Foodliner supermarket, a pharmacy, a feed store, cafes, a drive-in restaurant, a gas station and convenience stores. (See, photos numbered 12-15 submitted with Application.)

Conclusions. Approval of the proposed Comprehensive Plan amendment is consistent and compatible with the predominant land use pattern in the area. The nearby community of Pleasant Hill can serve the convenience and daily shopping needs of the residents of the proposed subdivision.

(6) Natural Boundaries.

Findings. The Staffordshire site is separated from the large cultivated parcel to the south by Highway 58 and from forest lands to the north by the Coast Fork of the Willamette River. On the western boundary of the site is a drainage slough flowing into the Coast Fork and an undeveloped, wooded area. Located beyond the wooded area are the truck tire repair business, Conde's Redwood Lumber and the office building referred to in (2), supra. The southeast boundary of the site abuts the small lots developed with rural residences fronting on Highway 58. To the east of the site is the large acreage owned by the Oregon Highway Division.

Conclusions. Natural boundaries to the north, west, south and southeast prevent aggregation of the developed portion of the site with nearby parcels to form a larger agricultural unit. The boundaries also serve to reduce any adverse effects of conflicting land uses.

C. Goal 3 (Agricultural Lands)

Goal 3 requires that agricultural lands be preserved and maintained for farm use.

Findings. The property subject to the proposed Comprehensive Plan amendment is physically developed and built upon and irrevocably committed to non-resource use, thereby justifying an exception to Goal 3.

Conclusions. Goal 3 is not applicable to the proposed Plan amendment.

D. Goal 4 (Forest Lands)

Goal 4 requires that forest lands be preserved and maintained for forest uses.

Findings. The property subject to the proposed Comprehensive Plan amendment is physically developed and built upon and irrevocably committed to non-resource use, thereby justifying an exception to Goal 4.

Conclusions. Goal 4 is not applicable to the proposed Plan amendment.

E. Goal 5 (Open Spaces, Scenic and Historic Areas and Natural Resources)

Goal 5 requires protection of listed types of natural resource, including needed open space and sites/structures with historic or cultural significance.

Findings. The property affected by the proposed Plan amendment is already developed. The property is not needed, desirable or available for open space. Because of the substantial improvements already developed on the site, it is not available for mineral or aggregate resources. The developed property does not provide fish or wildlife areas or habitats, nor does it constitute an ecologically or scientifically significant natural area. The property is level, providing no outstanding scenic views or sites. The property cannot be classified as a wilderness area, and it contains no historic areas, sites, structures or objects.

The northern 58 plus or minus acres of the site will be preserved as permanent open space. This portion of the site is located adjacent to the Coast Fork of the Willamette River and portions of it are located within the boundaries of the Willamette River Greenway.

Conclusions. The proposed Plan amendment is consistent with Goal 5.

F. Goal 6 (Air, Water and Land Resource Quality)

Goal 6 requires the protection of the air, water and land resource quality of the state.

Findings. The Staffordshire development has been extensively reviewed by Lane County. The county has previously determined that the community septic systems in place are adequate to support the level of development posed and will not violate any applicable state or federal environmental quality statutes, rules or standards. Lane County has also evaluated the water system and determined that it will not deplete ground water resources in the area.

Conclusions. The proposed Plan amendment is consistent with Goal 6.

G. Goal 7 (Areas Subject to Natural Disasters and Hazards)

Goal 7 requires the protection of life and property from natural disasters and hazards.

Findings. The property affected by the proposed Plan amendment is not subject to natural disasters and hazards regulated under Goal 7. The question of flood elevations for this area was reviewed at the time the conditional use permit was approved in 1980. Portions of the northern 58 plus or minus acres are located within the floodway of the Willamette River and would be subject to Goal 7. However, the northern portion of the site is specifically excluded from the Plan amendment.

Conclusions. The proposed Plan amendment is consistent with Goal 7.

H. Goal 8 (Recreational Needs)

Goal 8 requires governmental units that have responsibilities for recreation areas and facilities to plan for meeting the recreational needs of the state and visitors.

Findings. The proposed Plan amendment involves an existing development containing a recreational center and swimming pool, along

with walking trails and open space along the Coast Fork of the Willamette River, all for the benefit and enjoyment of its residents. No appreciable impact on nearby residential facilities is anticipated.

Conclusions. The proposed Plan amendment complies with Goal 8.

I. Goal 9 (Economy of the State)

Goal 9 requires the diversification and improvement of the economy of the state.

Findings. The infill of the Staffordshire development, pursuant to the proposed Plan amendment, will add 131 owner-occupied residential dwellings to the tax base of Lane County and will provide affordable and diverse housing alternatives for the citizens of Lane County.

Conclusions. To the extent Goal 9 is applicable, the proposed Plan amendment complies with the Goal.

J. Goal 10 (Housing)

Findings. The proposed Plan amendment would recognize an existing residential development, built pursuant to two Lane County permits, and allow infill and marketing of the development as a subdivision. The Staffordshire development provides an affordable housing alternative in a rural setting for retired persons and others without sufficient economic means to purchase a stick-built home on a large rural lot.

Conclusions. The proposed Plan amendment complies with Goal 10, because it provides an additional housing alternative for the citizens of the state, i.e., owner-occupied mobile homes in a secure subdivision situated in a rural setting.

K. Goal 11 (Public Facilities and Services)

Goal 11 requires Lane County to plan for a timely, orderly and efficient arrangement of public facilities and services.

Findings. Goal 11 requires that rural development be guided and supported by the types and level of rural facilities and services appropriate for, but limited to, the needs and requirements of the rural area to be served. Rural facilities and services are defined in Goal 11 as: "Facilities and services which the governing body determines to be suitable and appropriate solely for the needs of rural use."

Lane County has not specifically identified those facilities and services considered suitable and appropriate for the area in which

the Staffordshire site is located. In other circumstances, e.g., Spencer Creek subarea, the county has identified the following characteristics as necessary to support rural residential development:

- (1) Land that is within a rural fire protection district (unless already developed); and
- (2) Land that has existing or reasonably attainable road access and where extension of school bus routs, mail delivery, electric and telephone service is practicable.

The Staffordshire development is already served by a community water system, community septic systems, a private street network, street lighting, and underground electrical, television and telephone systems. The property is located within the boundaries of the Goshen Fire District and fire hydrants have been installed in the development. The property directly abuts and has direct access to Highway 58. Mail delivery service is already provided to the development.

Conclusions. The existing Staffordshire development has all of the services necessary and appropriate for rural development, and the proposed Plan amendment complies with Goal 11.

L. Goal 12 (Transportation)

Goal 12 requires the provision of a safe, convenient and economic transportation system.

Findings. The Staffordshire development has direct access to a major state thoroughfare, Highway 58. During prior development reviews, provision was made for a left-hand turn lane to improve ingress from and egress to Highway 58, and the applicant has posted a bond to cover construction costs. The applicant has also specifically agreed with present occupants of Staffordshire to construct the turn lane at the applicant's expense.

Conclusions. To the extent Goal 12 is applicable, the proposed Plan amendment complies with the Goal.

M. Goal 13 (Energy Conservation)

Goal 13 requires Lane County to encourage the conservation of energy.

Findings. Approval of the proposed Plan amendment will encourage infill of an existing mobile home development and will allow efficient use of the sewer and water systems and streets and utilities already in place.

Conclusions. Approval of the proposed Plan amendment is consistent with the objectives of Goal 13.

N. Goal 14 (Urbanization)

Goal 14 requires an orderly and efficient transition from rural to urban land uses.

Findings. The subject property is located outside of the urban growth boundary. The level of development which will be allowed at Staffordshire pursuant to the proposed Plan amendment averages slightly more than one unit per acre, which the county has designated a rural level of development in the subarea plans discussed at III (A), supra.

Because the Staffordshire development is already served by private water and sewer systems, a private street network and required utilities, approval of the proposed Plan amendment will not require extension of urban facilities beyond the urban growth boundary and, therefore, will not have an adverse impact on the urban growth boundary. Because the original conditional use approval of the Staffordshire development predated enactment of the State-wide Planning Goals, allowing marketing and infill of the existing development does not violate the objectives of Goal 14.

Conclusions. To the extent Goal 14 is applicable, the proposed Plan amendment is consistent with the Goal's objectives.

O. Goal 15 (Willamette River Greenway)

Goal 15 requires implementation of the Willamette River Greenway statute.

Findings. The portion of the Staffordshire site affected by the proposed Plan amendment is located outside the boundaries of the Willamette River Greenway. Portions of the northern 58 plus or minus acres are located within the boundaries of the Greenway. Said portion of the site will be preserved as open space under the proposed Plan amendment.

Conclusions. Approval of the proposed Plan amendment is consistent with and will support the objectives of Goal 15.

P. Goals 16-19 (Coastal Resources)

Findings. The Staffordshire site is not in the coastal area of the state.

Conclusions. Goals 16-19 are not applicable to the proposed Plan amendment.

Overall Conclusions.

The proposed Plan amendment complies with all applicable State-wide Planning Goals.

V. Conclusions Concerning Comprehensive Plan Amendment

The proposed Plan amendment to the 1990 General Plan explicitly recognizes the development already approved by Lane County. The text amendment applies to the specific situation of Staffordshire in order to avoid potential expansion to other areas. The amendment text is set forth as follows:

"The Staffordshire mobile home development is located in an area generally designated in this Plan for agricultural use. Because of prior approval and because the development exists, it shall be permitted to continue through application of appropriate zoning. However, the development shall not be expanded beyond the 131 units currently approved."

The findings and conclusions set forth at III(A), supra, justify a determination that there have been sufficient changes in circumstances and public policy to warrant approval of amendment or supplement to the Comprehensive Plan in accordance with Lane Code § 12.050(2). The amendment recognizes an existing development which has twice been approved by Lane County since adoption of the 1990 General Plan in 1972.

As demonstrated by the findings and conclusions set forth at III(B), supra, recognition of the Staffordshire development is consistent with the unamended portions of the 1990 General Plan and other county plans. The proposed Plan amendment is appropriately limited to the development already approved and precludes expansion of such development.

ZONE CHANGE EVALUATIONVI. RA/MH Zoning District

Findings. The proposed rezoning will permit conversion of the Staffordshire mobile home development from a mobile home park to a mobile home subdivision. Two zoning classifications are provided in the Lane County Code which would permit such a subdivision.

- (1) A mobile home subdivision could be approved in a Rural Residential District (Lane Code § 10.130.10(1)). To accommodate the number of lots approved on the site in a Rural Residential Zoning District, it would be

necessary to rezone the entire site, including the northern 58 plus or minus acres not included in the proposed Plan amendment and not subject to the built-upon and committed exception to Goal 3.

- (2) Application of the Suburban Residential District (Lane Code § 10.135) to the southern 55 plus or minus acres of the subject property, coupled with the Mobile Home Combining District (Lane Code § 10.185), would also permit conversion of the mobile home park into a mobile home subdivision. Use of the RA/MH district allows rezoning only of that portion of the property subject to the proposed amendment to the 1990 General Plan and eliminates the necessity for considering rezoning of the northern 58 plus or minus acres.

The Lane County Planning Division staff reviewed and approved the RA/MH district as the most appropriate county zoning district for application to the Staffordshire development.

Conclusions. Provided that all other Lane Code criteria are met, rezoning the subject property under the RA/MH district is provided for and appropriate under the County Code.

VII. Applicable Lane Code Criteria

A. Consistency with Comprehensive Plan

Lane Code Section 10.315-20 requires a determination that any rezoning be consistent with the applicable Comprehensive Plan.

Findings. The Comprehensive Plan applicable to the subject property is the 1990 General Plan. Lane County has approved two conditional use permits in 1973 and 1980 authorizing development of the Staffordshire mobile home park. In each instance, the county determined that the development was consistent with the 1990 General Plan, to the extent the Plan was applicable.

An amendment to the 1990 General Plan has been approved which specifically provides for continued use of the Staffordshire development through application of appropriate county zoning.

Conclusions. Rezoning the southern 55 plus or minus acres of the Staffordshire development to an RA/MH designation is consistent with the 1990 General Plan, as amended. The area to be rezoned is limited to the southern portion previously approved for development. The northern 58 plus or minus acres will not be rezoned. Application of the RA/MH district to the southern portion of the property will permit conversion of the previously approved development from a mobile home park to a mobile home subdivision. No additional development beyond that already approved will be possible as a result of this rezoning.

B. Criteria for Mobile Home Districts

Lane Code § 10.185-06 describes three criteria which should be taken into consideration when establishing a mobile home district.

- (1) The mobile home district "may be used as a buffer between commercial or light industrial and residential districts."

Findings. An industrial/commercial area is located immediately adjacent to the western boundary of the Staffordshire mobile home development. The industrial/commercial area consists of an office structure, a truck tire repair business and Conde's Redwood Lumber. An extensive gravelled parking area surrounding the three businesses has been used in the past for parking of logging trucks. The predominant pattern of development to the west of the subject property is residential dwellings on small rural acreages.

Conclusions. Establishing a mobile home district on the subject property complies with the criterion requiring use of the district as a buffer between commercial or light industrial and residential districts.

- (2) The Code states that: "Adequate buffering or screening may be required in order to make the mobile home district compatible with its adjacent and surrounding uses."

Findings. Consistent with prior conditional use permit approvals, landscape screening has been planted along the west and south boundaries of the Staffordshire mobile home development. There is dense vegetation consisting of mature trees and extensive underbrush along the eastern boundary of the development. The area physically developed and subject to the rezoning is buffered on the north by the 63 plus or minus acres which will be maintained as permanent open space.

Conclusions. The Staffordshire development is already extensively buffered or screened from its adjacent and surrounding uses.

- (3) Code Section 10.185-06 requires that: "This district should not be superimposed upon areas less than five acres in area nor more than 50 acres in area, unless it is shown that lesser or greater concentration of said use would be compatible with the surrounding property and its use."

Findings. The area already approved for development under conditional use permits and subject to the rezoning application is comprised of slightly more than 50 plus or minus acres, but is based upon prior conditional use approvals and is otherwise appropriate for the subject development.

Conclusions. The subject property is slightly greater than the maximum size suggested by the Code, but is otherwise appropriate for the subject development and meets the other criteria in Code Section 10.185-06.

(C) Consistency with State-wide Planning Goals

Lane Code § 10.315-20 requires that any rezoning be consistent with the State-wide Planning Goals for any portion of Lane County which has not received acknowledgment of compliance with the Goals.

Findings. The Comprehensive Plan for this portion of Lane County has not received acknowledgment of compliance with the State-wide Planning Goals. Detailed findings and conclusions demonstrating that the proposed amendment to the 1990 General Plan for the subject property complies with all applicable Goals are set forth, supra, at IV. Those findings and conclusions are applicable to the proposed rezoning and are incorporated herein by reference as if fully set forth.

Conclusions. The proposed zone change complies with all applicable State-wide Planning Goals.

VIII. Final Conclusions

The amendment to the 1990 General Plan and concurrent rezoning for the Staffordshire mobile home development recognize an existing development which has occurred as a result of prior county approvals. The effect of the amendment and rezoning is to permit conversion of the Staffordshire development from a mobile home park to a mobile home subdivision. Neither the Plan amendment nor the rezoning have implications for further development, because expansion of the existing development is expressly prohibited. The Plan amendment and concurrent rezoning conform with all applicable provisions of the Lane County Code and the State-wide Planning Goals. The safety and welfare of present Staffordshire occupants and neighboring residents are protected by the applicant's specific agreement to construct, at its own expense, a lighted, chain-link fenced, resident-only, key-locked recreational vehicle parking lot and a paved left-hand turn lane on Highway 58 and to engineer and construct drainage ditches in accordance with flood plain management and Lane County requirements.

LIST OF PHOTOS SUBMITTED WITH STAFFORDSHIRE APPLICATION

1. Stafford residence
2. Carrie's Antiques
3. Stafford residence immediately west of Staffordshire with AG and Water Services business)
4. Truck tire repair business west of Staffordshire on Highway 58
5. Conde's Redwood Lumber on Highway 58 west of Staffordshire
6. Office building adjacent to Conde's Redwood Lumber on Highway 58 west of Staffordshire
7. Auto repair and custom welding businsss west of Staffordshire on Highway 58
8. Sutherland's Market on south side of Highway 58 immediately west of Staffordshire site
9. Oaks Mobile Home Park on Seavey Loop Road
10. Gooden's Trailer Court on Seavey Loop Road north and west of Staffordshire
11. Mobile Home Subdivision on Willamette River developed by Albert Allen, north of Staffordshire
12. Moran's IGA Foodliner in Pleasant Hill
13. Convenience shopping center in Pleasant Hill including feed supply store and two cafes
14. Gas station adjacent to convenience shopping center in Pleasant Hill
15. Dairy Queen Drive-in restaurant in Pleasant Hill

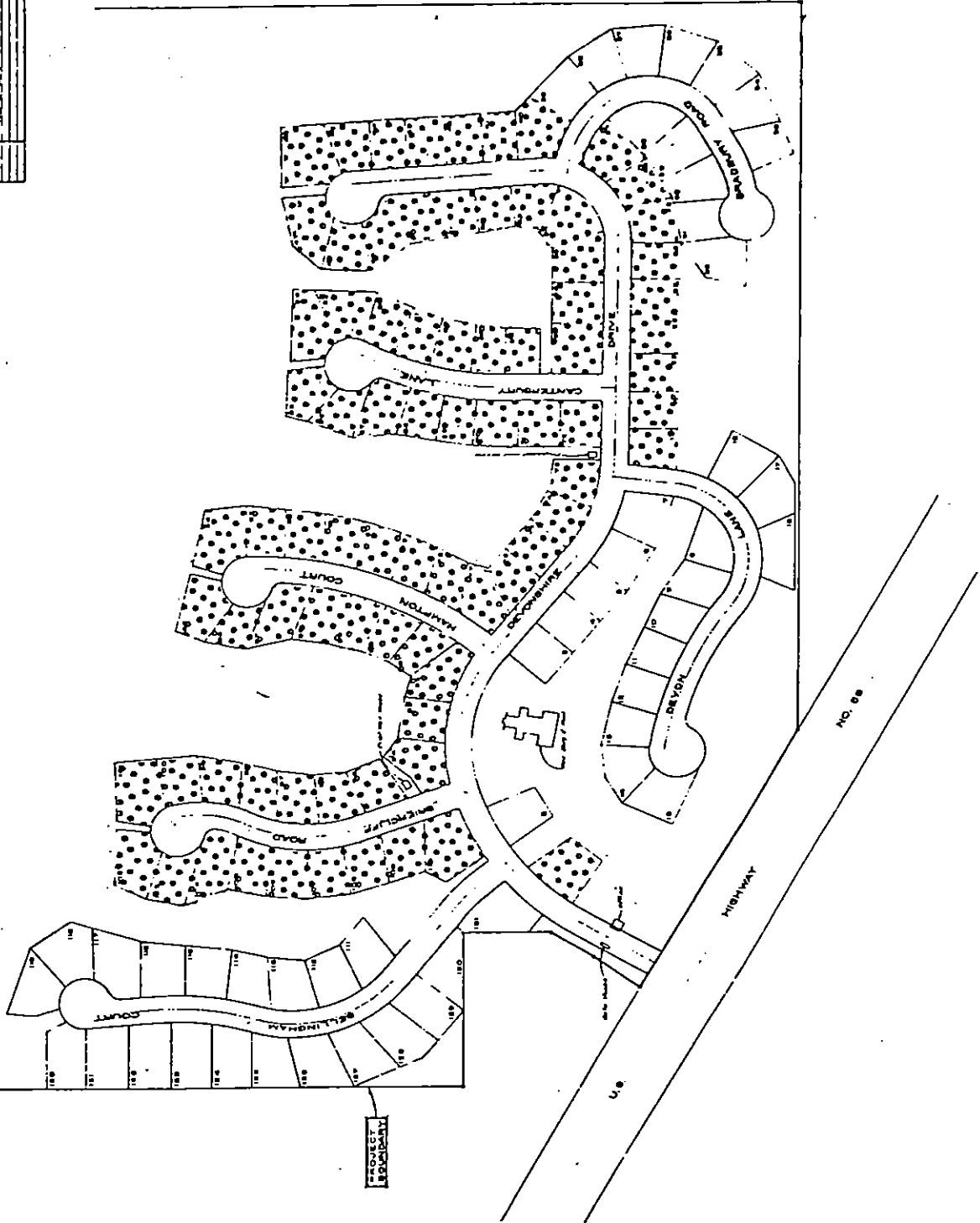
STATE ROADWAY INC.
 ROAD AND LOT LAYOUT
 STAFFORDSHIRE MOBILE HOME PARK

APPROVED BY
 Local Planning
 Authority

DATE: 1973

SCALE: 1:1000

PROJECT REFERENCE: 119



50 spaces approved in 1980

11

STAFFORDSHIRE INC.
 ROAD AND LOT LAYOUT
 STAFFORDSHIRE MOBILE HOME PARK

REGISTERED
 LAND SURVEYOR
 CALIFORNIA
 No. 1000

DATE: 11/1/80

SCALE: AS SHOWN

PROJECT: STAFFORDSHIRE MOBILE HOME PARK

REVISIONS:

NO.	DATE	DESCRIPTION
1		AS SHOWN

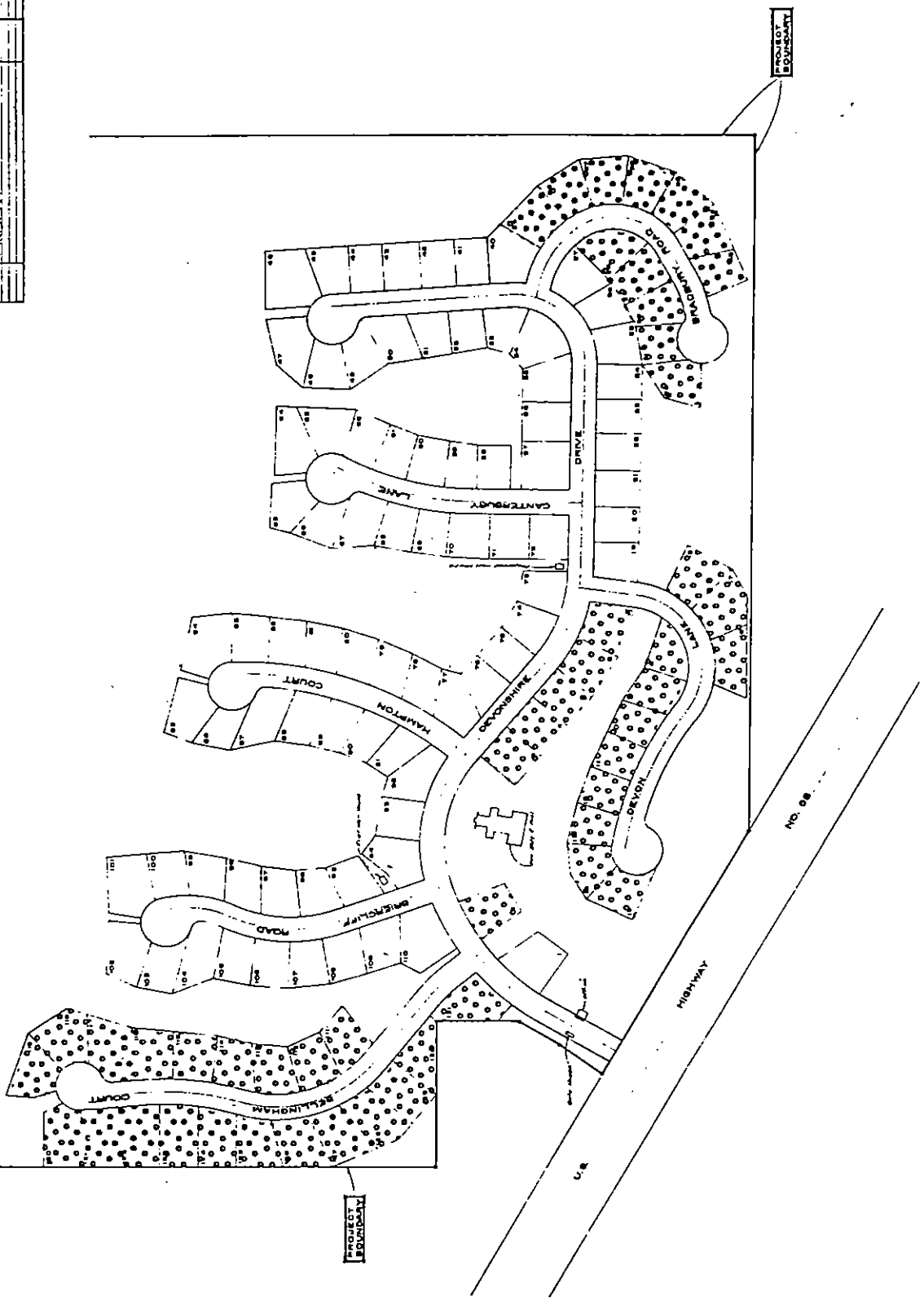


Exhibit "C"

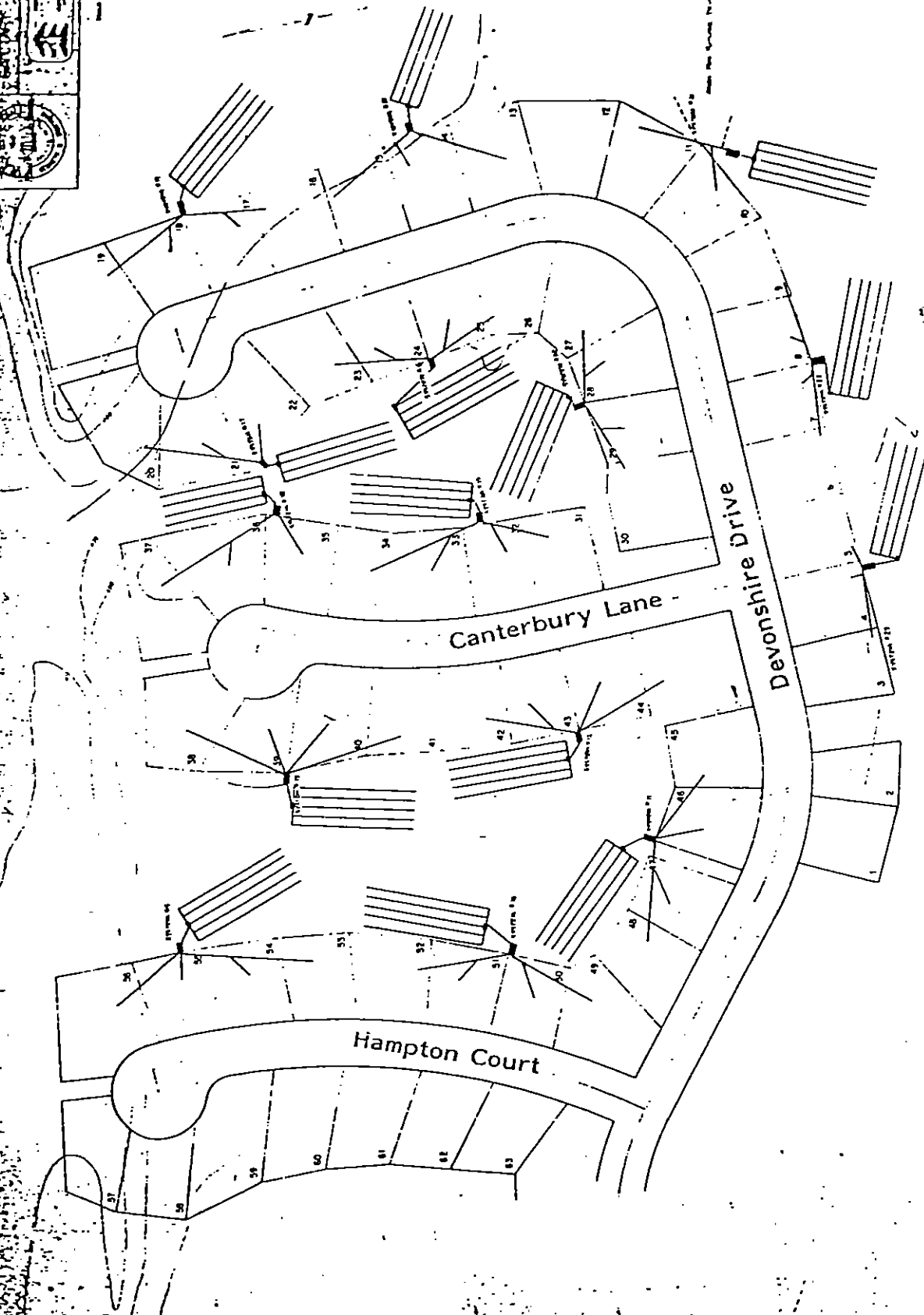
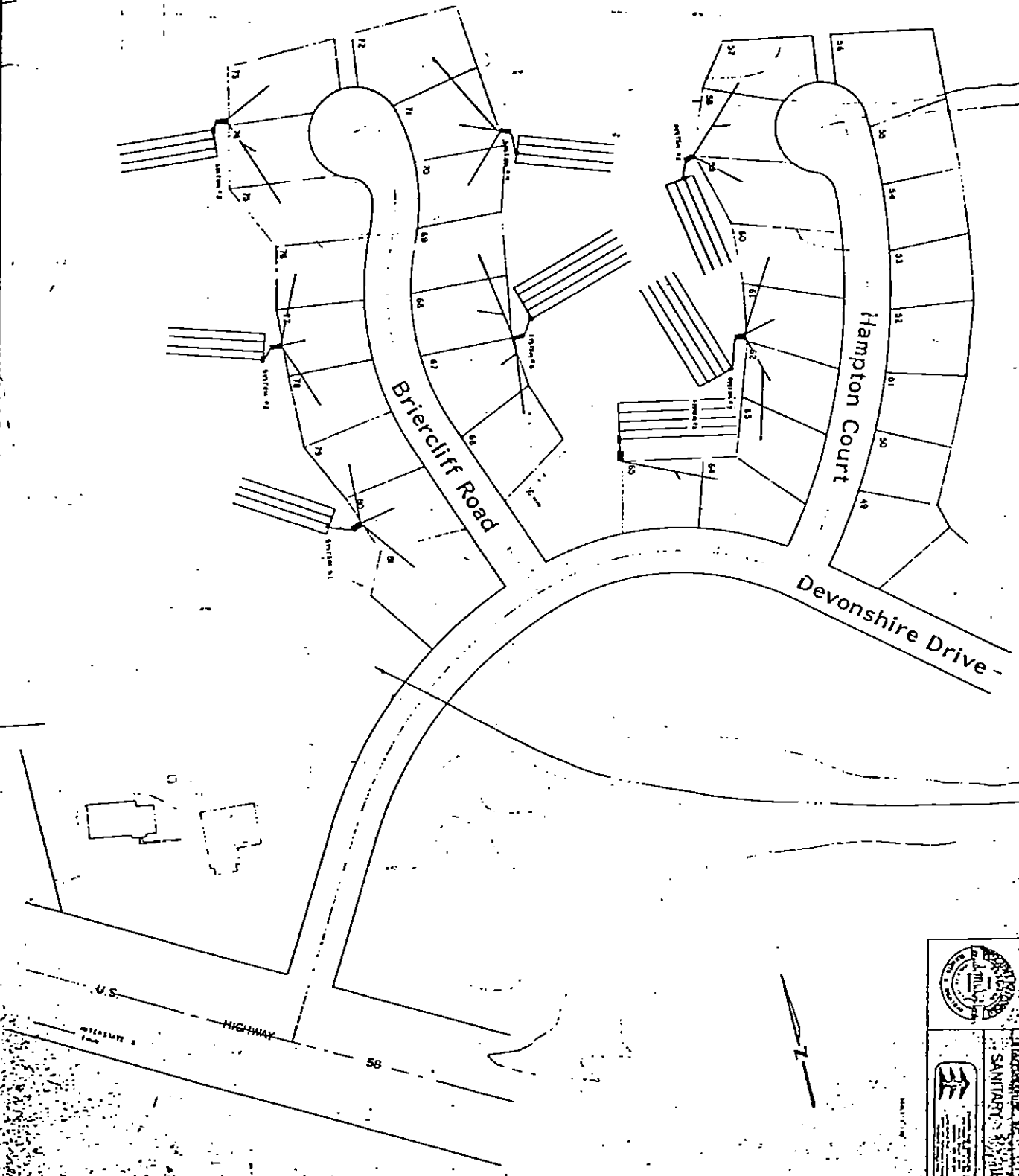


EXHIBIT "D"



Professional seal and logo for Santary's Sanitary Engineering, Inc. The seal is circular and contains the text 'SANTARY'S SANITARY ENGINEERING, INC.' and 'REGISTERED PROFESSIONAL ENGINEER'. Below the seal is the company logo, which consists of a stylized 'S' and 'E' inside a square. To the right of the logo is the text 'SANTARY'S SANITARY ENGINEERING, INC.' and 'REGISTERED PROFESSIONAL ENGINEER'. Below this is the name 'WALTER W. SANTARY' and the date 'MAY 1978'.

STANDARDIZED INC. - SPRINGFIELD, OHIO

SANITARY IMPROVEMENTS

1000 W. 10th St. Springfield, Ohio

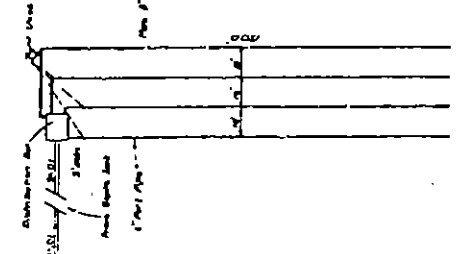
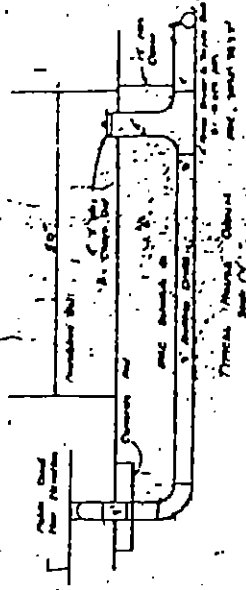
Phone 2-1234

SALES
ESTIMATING
ENGINEERING
CONSTRUCTION

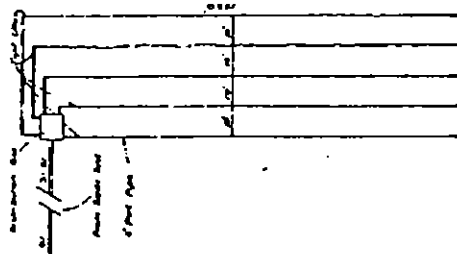
DATE: 10/15/50

PROJECT: COMMUNITY SEPTIC SYSTEM

SCALE: AS SHOWN



TYPICAL DRAINFIELD PLAN FOR THREE UNIT SYSTEM
Scale: 1/8" = 1'-0"



TYPICAL DRAINFIELD PLAN FOR FOUR UNIT SYSTEM
Scale: 1/8" = 1'-0"

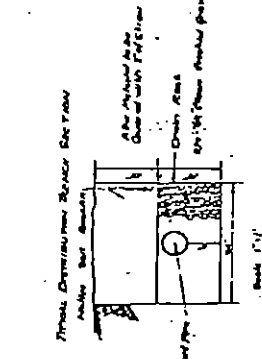


EXHIBIT "F"

Calculations for Three Unit System

Storage Flow: 1183 gallons
 775 Gallons per week per day
 Minimum Storage: 1183 gallons
 517 Gallons per week per day
 45.7 Gallons per week per day
 This system will require 1183 gallons flow

Calculations for Four Unit System

Storage Flow: 1700 gallons
 915 Gallons per week per day
 Minimum Storage: 1700 gallons
 517 Gallons per week per day
 45.7 Gallons per week per day
 This system will require 1700 gallons flow

Exhibit "F"
 Community Septic Systems
 Design Detail

EXHIBIT "G"

Map of Section 19, Township 18, Range 2 West

Section 19 T.18S. R.2W. W.M.
LANE COUNTY
P. 400'

18 02 18

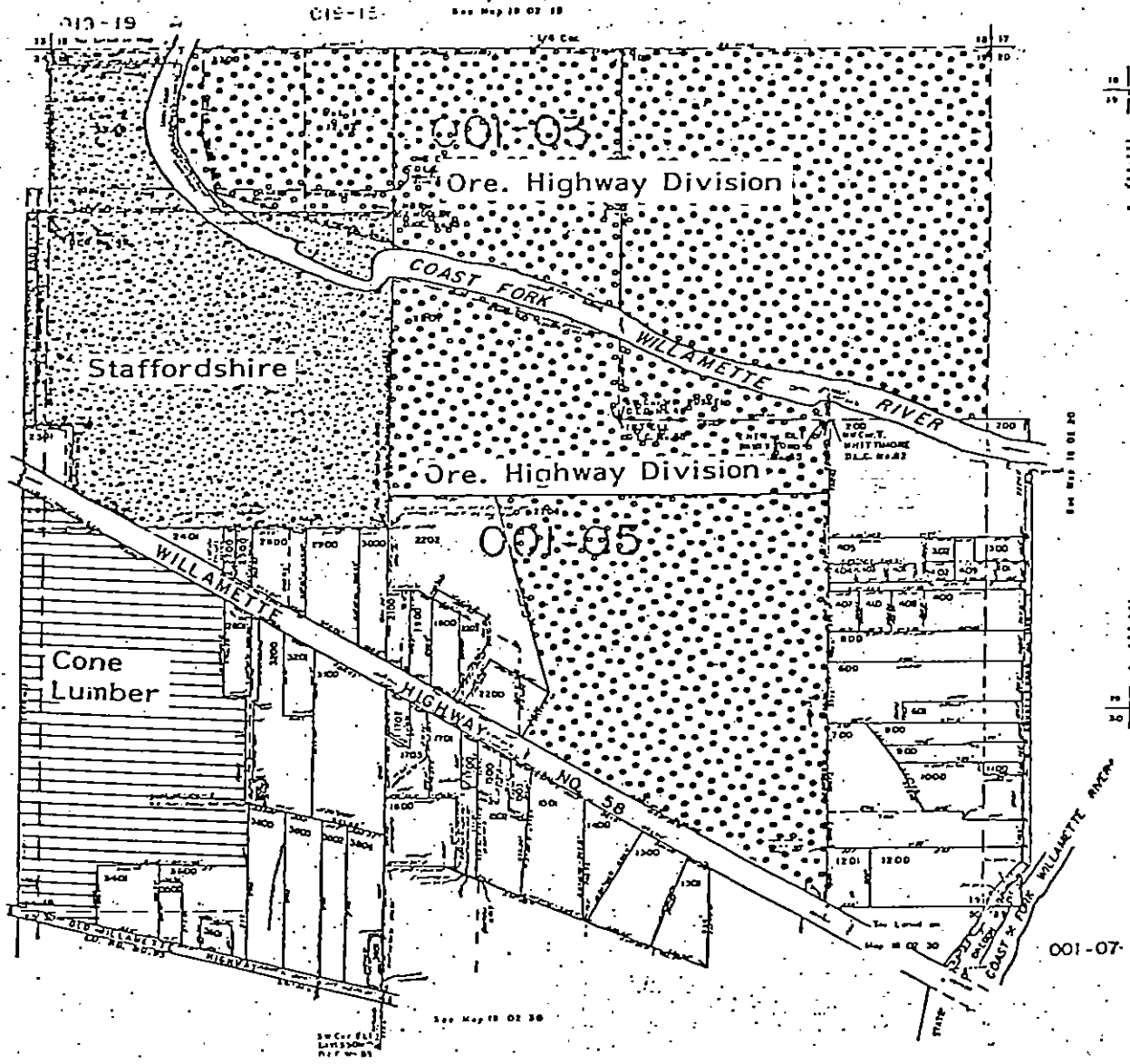


EXHIBIT "H"

Section 19 Township 18, Range 02 Data

Tax Lot	Ownership	Improvement	Acreage
2501	Stafford	SFD	1.68
2401	Stafford	V	1.43
2700	Stafford	V	0.43
2500	Stafford	SFD	0.76
2800	Kopplin	SFD	3.19
2900	Susbauer	SFD	4.46
3000	Rieck	SFD	2.97
2200	Gardner	SFD	13.78
2100	Glazier	SFD	1.59
1900	Lowery	SFD	1.59
2203	Cornelius	V	1.52
2200	Sorenson	SFD	2.94
2601	Russell	SFD	2.00
3200	Eagle	MH	6.20
3201	Standard	SFD	2.16
3100	Parrish	SFD	9.37
1702	Geer	SFD	0.93
1703	Strait	SFD	2.49
1701	Crouse	SFD	3.67
1700	King	SFD	0.74
1500	Mayers	SFD	0.84
1502	Mayers	SFD	3.54
1503	Mayers	SFD	0.88
1501	Lindley	SFD	5.89
1400	Lindley	SFD	3.00
1300	Bessett	MH	5.01
1301	Walstrom	SFD	3.14
200	Pritchard	MH	3.76
300	Lloyd	SFD	0.97

Improvement

V-----vacant

SFD---single family dwelling

MH---mobile home

CH---convalescent home

EXHIBIT "H"

Section 19 Township 18, Range 02 Data

Tax Lot	Ownership	Improvement	Acreage
302	Franklin	V	0.56
400	Nice	SFD	3.50
402	Franklin	MH	0.43
401	Moore	SFD	0.45
403	Hanson	SFD	0.45
404	Perkins	SFD	0.45
405	Melby	SFD	1.98
406	Vogtsberger	MH	0.43
407	Franklin	MH	1.11
408	Neher	SFD	1.10
409	Johnson	MH	0.98
410	Floyd	SFD	1.10
500	Aarestad	SFD	4.91
600	Nice	SFD	7.50
601	Wedbush, Noble, Cook	SFD	2.16
700	Harrison	SFD	10.17
800	Gessford	SFD	2.70
900	Roche	SFD	1.94
1000	Twilight Acres Nursing Home	CH	4.39
1100	Stebbeds	SFD	0.42
1200	Stebbeds	SFD	6.86
1201	Hayes	SFD	2.06

Improvement

- V-----vacant
- SFD---single family dwelling
- MH---mobile home
- CH---convalescent home

EXHIBIT "I"

Section 23 Township 18, Range 03 Data

Tax Lot	Ownership	Improvement	Acreage
100	McPherson	SFD	20.00
101	Wingard Construction	V	1.61
102	Wingard Construction	CI	5.00
103	Kachina Plywood	CI	7.68
104	Kachina Plywood	CI	0.76
105	Kachina Plywood	CI	0.45
200	Millegan	SFD	35.06
201	Oregon Highway Div.	V	1.04
300	Krebs	SFD	0.39
400	Murdock	SFD	3.75
500	Lane County	V	5.00
600	Cornelius	SFD	9.50
601	Jensen	MH	3.08
1701	Baxley	MH	13.18
1800	Phillips	SFD	0.82
1900	Key	SFD	0.85
2000	Lynch	SFD	1.80
2100	Handley	SFD	6.94
2101	Miller	SFD	2.76
2102	Miller	V	0.82
2103	Miller	V	4.26
2104	Ingwersen	MH	5.08
2300	Sanchez	SFD	0.60
2400	Getchell	MH	3.78
2200	Simon	SFD	0.58
2500	Lane County	MH	0.15
2501	Staley	SFD	9.12
2700	Bassett	SFD	0.33
2800	Morphis	SFD	0.33

Improvement

- V-----vacant
- SFD---single family dwelling
- MH----mobile home
- CI----commercial improvement
- ED----education

EXHIBIT "I"

Section 23 Township 18, Range 03 Data

<u>Tax Lot</u>	<u>Ownership</u>	<u>Improvement</u>	<u>Acreage</u>
2900	Foley	SFD	0.34
3000	Overton	SFD	1.09
3100	Sutherlin	MH	1.01
3200	Booth	Ed	0.33
3300	Hilton	SFD	0.33
3400	Vertrees	SFD	0.33
3500	Gardner	SFD	0.33
3600	Woolley	SFD	0.99
3800	Bernard	SFD	0.99
3900	Overton	SFD	0.49
4100	Martin	SFD	1.05
4200	Nice	SFD	0.99
4300	Thoreby	SFD	0.99
4400	Larson	SFD	1.05
4601	Thornton	MH	5.00
4600	Wegner	MH	5.00
4700	Noltes	MH	60.00

Improvement

- V-----vacant
- SFD---single family dwelling
- MH---mobile home
- CI---commercial improvement
- ED---education

EXHIBIT "J"

Map of Section 23, Township 18, Range 3 West

