

BEFORE THE BOARD OF COUNTY COMMISSIONERS OF LANE COUNTY, OREGON

**ORDINANCE NO. PA 1142 (IN THE MATTER OF AMENDING THE JUNCTION CITY
(COMPREHENSIVE PLAN TO MODIFY THE URBAN
(GROWTH BOUNDARY WITHIN THE CITY LIMITS AND ADOPT
(AN EXCEPTION PURSUANT TO STATEWIDE PLANNING
(GGAL 2; AND ADOPTING A SEVERABILITY CLAUSE
((file PA 99-6075; Country Coach, Inc)**

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

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

WHEREAS, in response to application by Country Coach, Inc. in September 1999, the City of Junction City adopted amendments to the Junction City Comprehensive Plan which included the addition of land to the Junction City Urban Growth Area within the City limits; and

WHEREAS, the applicant and City of Junction City have requested Lane County action in co-adopting the Urban Growth Boundary amendment, with adoption of an exception to Statewide Planning Goal 14 pursuant to OAR 660-04-010(1)(c), to achieve city-county coordination of the Junction City Urban Growth Boundary location; and

WHEREAS, the Lane County Planning Commission reviewed the proposal in public hearing on September 7, 1999, and recommended approval of the proposed amendment; and

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

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

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

Section 1. The Junction City Comprehensive Plan as an element of the Lane County Comprehensive Plan is amended by modification of the Junction City Urban Growth Boundary and the addition of land, described as a portion of tax lot 100, map 16-04-05, to the Junction City Urban Growth Area, such new Urban Growth Boundary and territory being further identified on Exhibit "A" attached and incorporated herein by this reference.

Section 2. An Exception pursuant to Statewide Planning Goal 14 factors for the action described in Section 1 of this Ordinance, taken in accordance with the requirements of ORS 197.732, Statewide Planning Goal 2 and applicable Oregon Administrative Rule requirements and set forth in the findings of fact and conclusions of law in pages 6 through 11 and pages 18 through 21 of Exhibit "B" attached to this Ordinance, is hereby adopted as part of the Junction City Comprehensive Plan.

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

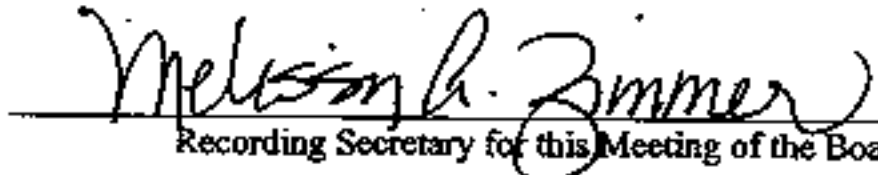
IN THE MATTER OF AMENDING THE JUNCTION CITY COMPREHENSIVE PLAN TO MODIFY THE URBAN GROWTH BOUNDARY WITHIN THE CITY LIMITS AND ADOPT AN EXCEPTION PURSUANT TO STATEWIDE PLANNING GOAL 2; AND ADOPTING A SEVERABILITY CLAUSE (file PA 99-6075; Country Coach, Inc)

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

ENACTED this 27th day of OCTOBER, 1999.

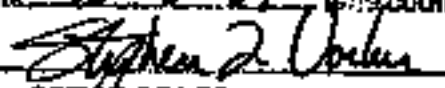


Chair, Lane County Board of County Commissioners



Recording Secretary for this Meeting of the Board

APPROVED TO FORM

Date 10-5-99 Lane County


OFFICE OF LEGAL COUNSEL

IN THE MATTER OF AMENDING THE JUNCTION CITY COMPREHENSIVE PLAN TO MODIFY THE URBAN GROWTH BOUNDARY WITHIN THE CITY LIMITS AND ADOPT AN EXCEPTION PURSUANT TO STATEWIDE PLANNING GOAL 2; AND ADOPTING A SEVERABILITY CLAUSE (file PA 99-6075; Country Coach, Inc)

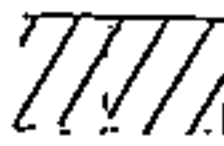
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AND TAXATION
ONLY

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LANE COUNTY
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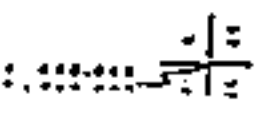
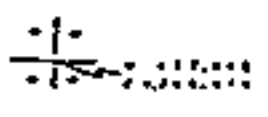
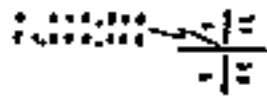
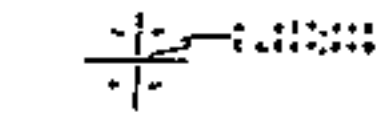
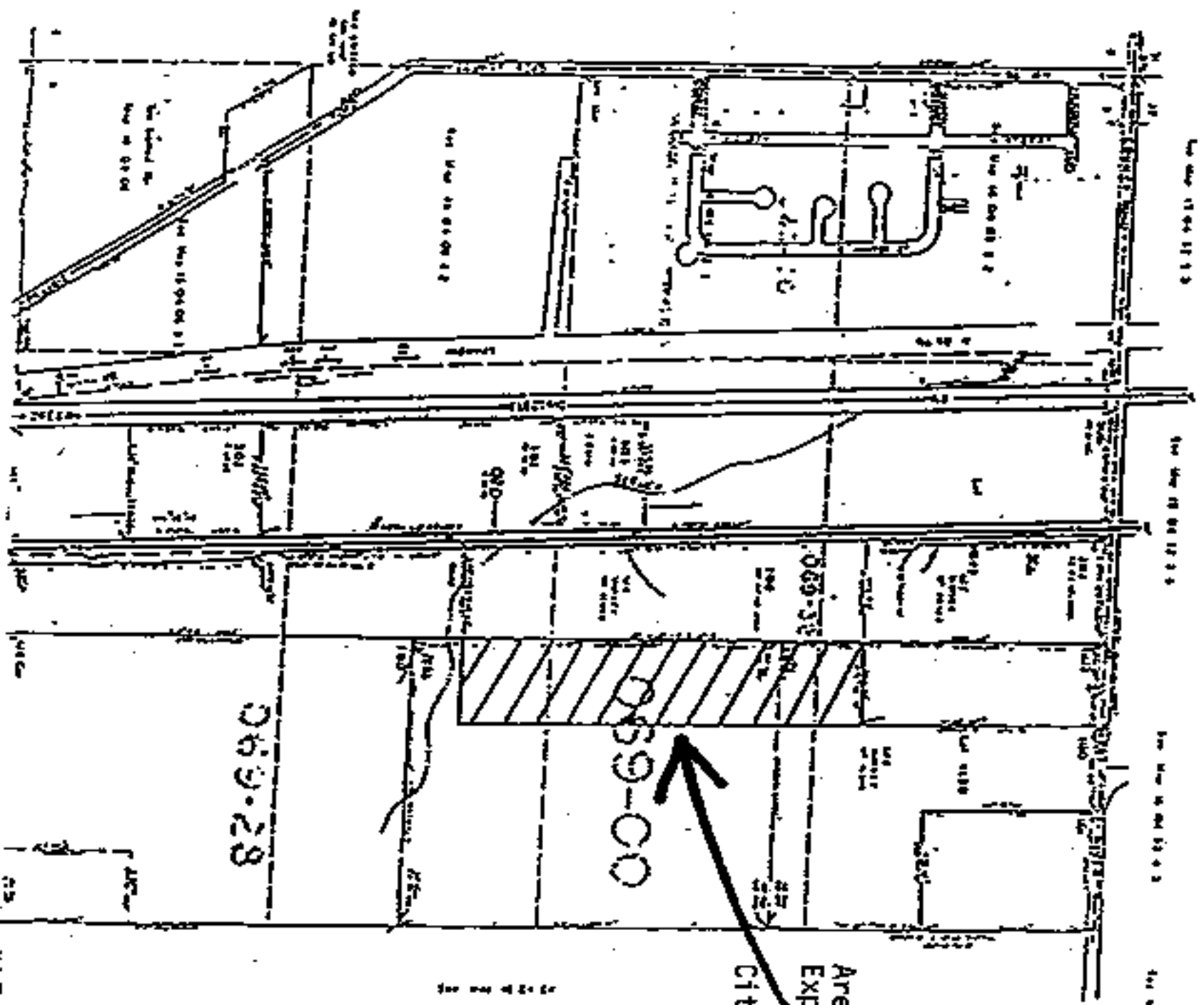
Area of UGB
Expansion
within
City Limits

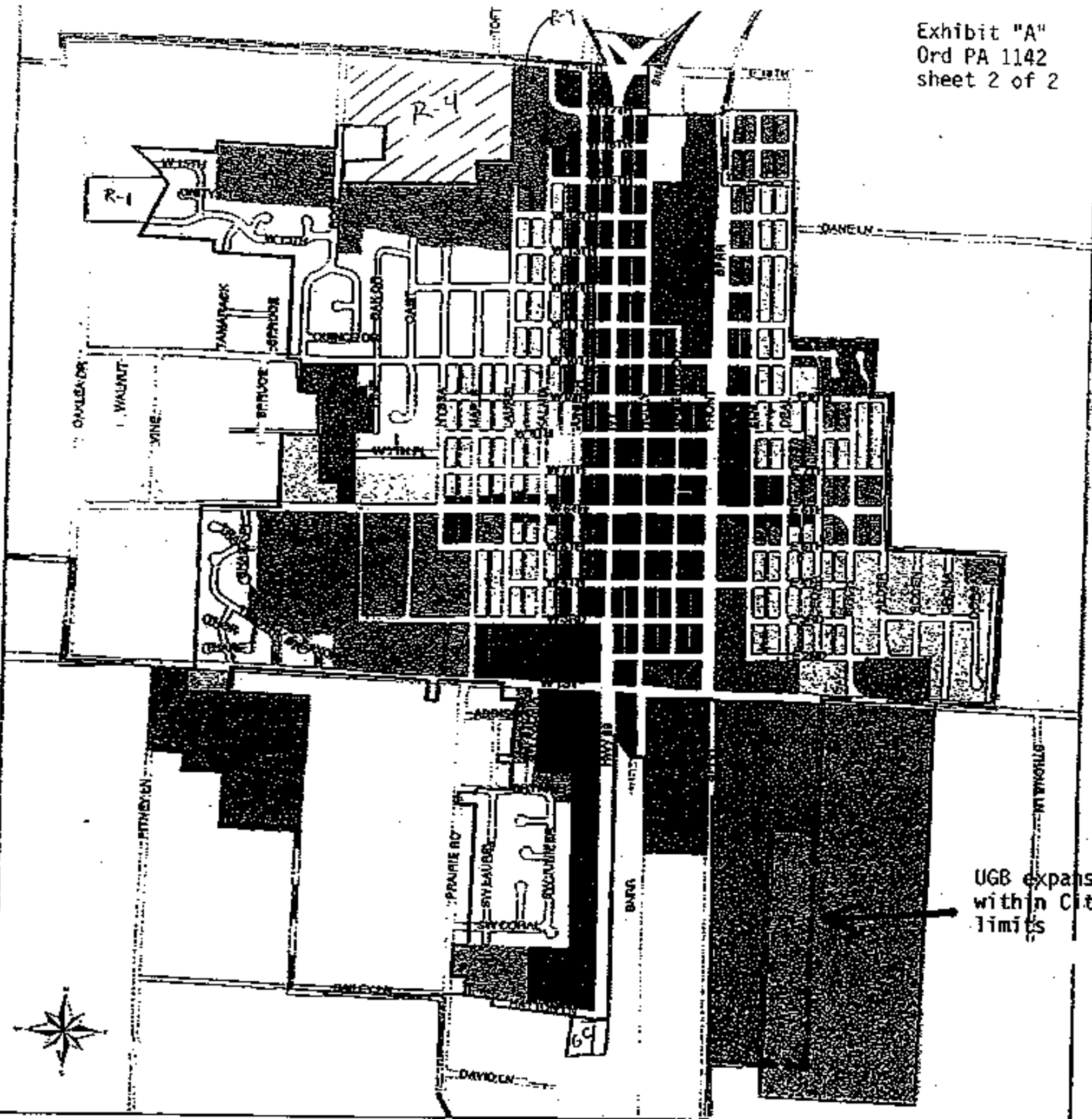
059-00

069-28

 SUBJECT PROPERTY

16 04 05
B INDEX





Junction City Zoning

	Agricultural (AG)		Single Family Residential (R-1)		Commercial Residential (CR)		Streets and Highways
	Public Land (PL)		Duplex Family Residential (R-2)		Central Commercial (C2)		City Limits
	Light Industrial (LI)		Multi-Family Residential (R-3)		General Commercial (GC)		Urban Growth Boundary
	Heavy Industrial (HI)		Multi-Structural Residential (R-4)				

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

Lane Council of Governments
125 East Eighth Avenue
Eugene, OR 97401
November, 1996

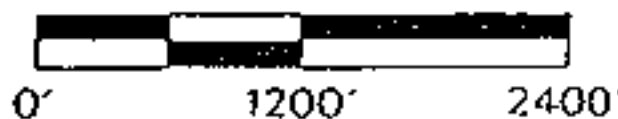


EXHIBIT B
PROPOSED
FINDINGS OF FACT AND REASONING
for
AMENDMENT OF THE JUNCTION CITY
COMPREHENSIVE PLAN AND URBAN GROWTH BOUNDARY

Ordinance PA 1142

Country Coach, Inc.

135 E. 1st Avenue
Junction City, Oregon

Submitted by:

HERSHNER, HUNTER, ANDREWS,
NEILL & SMITH, LLP

APPLICATION

Applicant: Country Coach, Inc.

Property Owner: Reerslev Properties, LLC.

Property Location: 17.5 acres adjacent to the existing Country Coach factory campus, located east of the Southern Pacific railway and south of West 1st Avenue, Junction City, Oregon. The property is within the city limits of Junction City but outside of the existing Urban Growth Boundary.

Assessors Map and Lot: Map 16-04-05, Tax Lot 100 (a portion thereof).

Current City Zoning: Agriculture (AG)

Attorney-Consultant: Hershner, Hunter, Andrews, Neill & Smith, LLP
180 E. 11th Avenue, Eugene, OR 97401.
(541) 686-8511

Submission Date: June 22, 1999

1.0 BACKGROUND INFORMATION.

The Board of Commissioners of Lane County make the following findings in support of adoption of the Ordinance. This action and these findings are confined to the expansion of the Junction City Urban Growth Boundary from one area fully within the City limits to a larger area also fully within the city limits and the justification required by local and state law for such an expansion. This action does not address City actions to amend its comprehensive plan within the City limits, redesignate property or rezone property.

1.1 General Site Description.

The property subject to this application contains nearly 17.5 acres and is adjacent to portions of the easterly and southerly boundaries of the existing Country Coach factory campus. The property is east of state Highway 99 and two railroad main lines, and south of West 1st Avenue in Junction City, Oregon. The property is located on a portion of Tax Lot 100, Lane County Assessor's Map No. 16-04-05. While the property is located inside the city limits of Junction City, it is currently outside of the city's Urban Growth Boundary.

The property is currently zoned for agricultural use. Adjacent property to the west and the north is zoned Light Industrial (M1). Adjacent property to the east and south is zoned Agricultural (AG).

Both the subject property and the existing Country Coach factory campus are inside the corporate limits of Junction City. The existing Country Coach factory receives the full range of urban services provided by the city. These include both water and sewer service. Electrical service is provided by Pacific Power & Light and Emerald People's Utility District.

Upon approval of the proposed Urban Growth Boundary amendment and zone change, Country Coach will expand its manufacturing facilities onto the property.

2.0 Criteria

Criteria applicable to the decision are found Land code 12.050 for Lane county Comprehensive Plan amendments and in OAR 660-04-0010 for the expansion of urban growth boundaries.

2.1 The Comprehensive Plan Map and Urban Growth Boundary Amendment Must Be Consistent with Lane Code Section 12.050.

Lane Code Section 12.050 provides:

Method of Adoption and Amendment.

(1) *The adoption of the comprehensive plan or an amendment to such plan shall be by an ordinance.*

(2) *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 upon a reevaluation of factors affecting the plan;

provided, the amendment or supplement does not impair the purpose of the plan as established by LC 12.005 above.

2.1.1 An error exists in the comprehensive plan.

This criterion is inapplicable. The amendment is not being proposed because of an existing error in the county's comprehensive plan.

2.2.2 Changed circumstances affecting or pertaining to the plan.

Country Coach is a recreational vehicle and bus conversion manufacturer, employing over 950 people at its factory campus in Junction City. It currently produces 4 lines of luxury motor coaches: the Allure line; the Intrigue Line, the Magna, Affinity and Concept (MAC) line; and the Prevost bus conversion line. Current production levels do not meet the nationwide demand for Country Coach products. In order to meet the demand for its products and increase its efficiency and competitiveness in the industry, Country Coach needs to expand its manufacturing facilities and its employee base. It has essentially three options:

1. Expand onto the adjacent 17.5 acre site that is the subject of this application.
2. Subject to finding a suitable and properly zoned site elsewhere in the Eugene/Springfield/Junction City area, build a non-adjacent satellite facility and then strive to minimize (i) the inefficiencies, (ii) the economic loss, (iii) the adverse impacts on local roadways and nearby highways, (iv) the waste of energy, and (v) the additional air pollution that will necessarily result from being forced to ferry employees (production, supervisory and technical) and vast quantities of materials (completed chassis, fiberglass panels, cabinetry, etc.) between the existing Country Coach campus and the non-adjacent satellite facility.
3. Close the existing facility and move the entire operation to another city or state where there is a site large enough to accommodate the expanded operation at a single location.

For the reasons discussed in more detail below and in connection with addressing the applicable criteria, only the first option is in the best interest of Country Coach and the community, and only the first option is reasonable from a land use planning perspective.

2.2.3 A change in public policy.

This criterion is inapplicable. The amendment was not proposed because of a change in public policy.

2.2.4 A change in public need based upon a reevaluation of factors affecting the plan.

This criterion is also inapplicable. The amendment was not proposed because of a change in public need based upon a reevaluation of factors affecting the plan.

3.1 The Junction City Urban Growth Boundary Amendments Are Consistent with Applicable Statewide Planning Goals.

3.1.1 Goal 1 - Citizen Involvement.

To ensure the opportunity for citizen involvement in all phases of the planning process.

The City of Junction City has provided written notice of the proposed amendments and public hearings before its planning commission to surrounding property owners within 500 feet of the subject property in accordance with state law and Section 111 of Ordinance 950; and has caused public notice of the proposed amendments and public hearings to be published in the Tri-County News, a local newspaper of general circulation in the city, in accordance with Section 108 of Ordinance 950. Notice was also posted in the vicinity of the subject property the week of July 12, 1999. The "Measure 56 Notice" was mailed to the owner of the subject property. The information included in the notices conforms with ORS 197.763(2) and (3) and enabled citizens to identify and comprehend the issues and to participate in a public process prior to final action by the city. Referral notices were also mailed to all federal, state, and private organizations listed in the city's Comprehensive Plan, pages 2-5, with the exception of the Oregon Business Planning Council, for which no current address was found.

Notice of the proposed amendments and the City Council public hearing was published in the Tri-County News on September 2, 1999, in accordance with Ordinance 950, Section 108. Notice was also posted in the vicinity of the subject property and at City Hall on September 3, 1999. The information included in the notices conforms with ORS 197.763(2) and (3) and enabled citizens to identify and comprehend the issues and to participate in a public process prior to final action by the city.

Lane County has provided equivalent notice pursuant to Lane Code Chapter 14.

The proposed amendments have been processed in a manner that assures full compliance with Goal 1.

3.1.2 Goal 2 - Land Use Planning.

To establish a land use planning process and policy framework as a basis for all decisions and actions related to the use of land and to assure an adequate factual base for such decisions and actions.

Goal 2, Part II-Exceptions, provides that a local government may adopt an exception to a goal when:

1. *Reasons justify why the state policy embodied in the applicable goals should not apply;*

2. *Areas which do not require a new exception cannot reasonably accommodate the use;*
3. *The long-term environmental, economic, social and energy consequences resulting from the use of the proposed site with measures designed to reduce adverse impacts are not significantly more adverse than would typically result from the same proposal being located in areas requiring a goal exception other than the proposed site; and*
4. *The proposed uses are compatible with other adjacent uses or will be so rendered through measures designed to reduce adverse impacts.*

OAR 660-004-0020 implements the intent of Goal 2 and provides substantively identical criteria.

3.1.2.1 OAR 660-004-0020(a)

"Reasons justify why the state policy embodied in the applicable goals should not apply": The exception shall set forth the facts and assumptions used as the basis for determining that a state policy embodied in a goal should not apply to specific properties or situations including the amount of land for the use being planned and why the use requires a location on resource land.

Country Coach is a recreational vehicle and bus conversion manufacturer, employing over 950 people at its factory campus in Junction City. It currently produces 4 lines of luxury motor coaches: the Allure line; the Intrigue Line, the Magna, Affinity and Concept (MAC) line; and the Prevost bus conversion line. All Country Coach motor coaches, except the Prevost bus conversion line, are built on a chassis manufactured by Country Coach at a plant located on its factory campus, and are equipped with either Cummins or Caterpillar diesel engines. Motor coaches manufactured by Country Coach are large and complex vehicles, ranging in length from 32 feet to 45 feet and in weight from 32,000 pounds to over 46,500 pounds. These vehicles are complete homes on wheels and include more than 35,000 moving parts. They have virtually all of the amenities of a small fully furnished home, including a full kitchen; a bedroom; a bathroom with a sink, shower and toilet; a living/dining area; and all of the necessary support systems including heating and air conditioning, plumbing, fresh and wastewater holding tanks, pumps, power generators and batteries. Manufacturing vehicles of this size and complexity requires a large and well-coordinated facility.

Country Coach has provided an analysis of its business expansion and its need for adjacent land for facility expansion. The analysis provides the facts and assumptions used to determine the needs and requirements of Country Coach. Country Coach has demonstrated that it must address its business expansion needs by enlarging its manufacturing facility and that expansion onto adjacent land is its best operational option.

The subject property is the only property in the Junction City area that can practically and reasonably meet Country Coach's expansion needs. It is adjacent to Country Coach's existing factory campus, is undeveloped, and is within the corporate limits of Junction City. Expansion onto the subject adjacent property will have significantly less negative impact upon Country Coach and the community than would expansion at a satellite site or moving the entire operation to another city or state. Expansion at a satellite site would result in ineffective use of multiple employees' and supervisors' time in transit, unnecessary fuel consumption and air pollution, and unnecessary traffic and wear and tear on public roads during the transportation of parts and materials between the existing facility and a satellite site. All other properties adjacent to Country Coach's business site are developed and unavailable for expansion of the site. These reasons support the county's taking of an exception to Goal 2.

3.1.2.2 OAR 660-004-0020(b)

"Areas which do not require a new exception cannot reasonably accommodate the use":

(A) The exception shall indicate on a map or otherwise describe the location of possible alternative areas considered for the use, which do not require a new exception. The area for which the exception is taken shall be identified;

(B) To show why the particular site is justified, it is necessary to discuss why other areas which do not require a new exception cannot reasonably accommodate the proposed use. Economic factors can be considered along with other relevant factors in determining that the use cannot reasonably be accommodated in other areas. Under the alternative factor the following questions shall be addressed:

(i) Can the proposed use be reasonably accommodated on nonresource land that would not require an exception, including increasing the density of uses on nonresource land? If not, why not?

Country Coach is in the business of manufacturing recreational vehicles. Junction City Ordinance No. 950 provides that manufacturing recreational vehicles is an outright permitted use in only two zones: the Light Industrial (M1) Zone; and the Heavy Industrial (M2) Zone. With one exception, all land inside the city limits and designated and zoned for M1 or M2 uses is already developed with industrial uses and is unavailable for Country Coach's expansion. The one exception is undeveloped land located between 9th and 12th Streets and Front and Elm Streets. That land is zoned for heavy industrial use and industrial development thereon would not require an exception to the statewide goals. That available site, however, cannot reasonably accommodate Country Coach's needs for expansion. The site is nine city blocks north of the existing Country Coach factory campus and cannot meet the adjacency requirement for expansion as explained in detail in the applicant's analysis and summarized in the above findings.

Land within the city zoned for residential use cannot reasonably accommodate Country Coach's needs for expansion. More importantly, no undeveloped land designated for residential use exists adjacent to the existing Country Coach factory campus. No other undeveloped land designated for residential use can reasonably accommodate the proposed use.

Lands designated by Junction City as Commercial and Professional Technical have similar impediments to use by Country Coach. No undeveloped land with those designations exists adjacent to the Country Coach factory campus. No undeveloped land with those designations can reasonably accommodate Country Coach's needs for expansion.

(ii) Can the proposed use be reasonably accommodated on resource land that is already irrevocably committed to nonresource uses, not allowed by the applicable Goal, including resource land in existing rural center, or by increasing the density of uses on committed lands? If not, why not?

Junction City has one other area on the north side of the city and within the current city limits that has a similar zoning and plan designation as the subject site and its surrounding area. That other area is located between 15th and 17th Streets and Front and Deal Streets. The area is zoned for agricultural use, is within the city limits, and is outside the Urban Growth Boundary. Because it is located 15 city blocks from Country Coach's factory campus, it would be unsatisfactory for Country Coach's expansion needs. No other areas have been identified within the Junction City Urban Growth Boundary that contain resource land designated or considered as irrevocably committed to non-resource use.

It is also not feasible to accommodate the proposed expansion by increasing the density of industrial uses on committed lands. The amount of land required for an industrial use is a function of the type of industry and the product produced. Operational considerations dictate the amount of land needed by the industrial user. For the reasons demonstrated by the applicant's analysis, Country Coach needs at least 17.5 acres for its expansion; and its only practical alternative is to expand its operations onto adjacent land. That expansion requires that the Urban Growth Boundary be amended to include the adjacent 17.5 acres.

(iii) Can the proposed use be reasonably accommodated inside an urban growth boundary; If not, why not?

Other land designated for industrial use exists outside of the city limits but inside the Urban Growth Boundary that would not require an exception to statewide goals to allow industrial development. However, such land exists in only two areas and neither area is satisfactory for Country Coach's expansion. Both areas are south of the Country Coach factory campus and are located in the industrial designated corridor extending parallel with Hwy 99 and between the

Southern Pacific and Burlington Northern railway tracks. Neither area is currently served by city water or sewer.

The first area consists of parcels located in the vicinity of the intersection of Prairie Road and Highway 99. There are nine undeveloped or partially developed parcels in this area, but all are smaller than nine acres. None of the parcels are large enough to accommodate Country Coach's needs and none are adjacent to its current factory campus. Each would require significant transportation and energy costs to move employees and materials between the existing factory campus and the parcel. Each would involve movement of employees and materials across main line rail tracks, where there are sometimes significant crossing delays. None of the parcels in this area can reasonably accommodate Country Coach's needs for expansion.

The second area consists of parcels located at or near the southern end of the industrial designated corridor. There are eleven undeveloped or partially developed parcels in that second area. Of those parcels, five are large enough to accommodate Country Coach's needs, but none are adjacent to its existing factory campus. Those parcels are located one and one-half to three miles south of the Country Coach campus. Each of those parcels presents the same transportation and energy issues as those in the first area discussed immediately above, including the need to move materials and employees over main line railroad crossings, and none of those parcels can reasonably accommodate Country Coach's needs for expansion.

Furthermore, the Department of Corrections has purchased or is in the process of acquiring through condemnation a total of 85.86 acres located at the southern end of the Junction City industrial designated corridor for the development of a medium security prison. The acquisition of that property by the Department of Corrections for its medium security prison effectively removes 85.86 acres from Junction City's inventory of industrially designated lands within its Urban Growth Boundary. The parcels subject to the acquisition are identified as Tax Lots 1200, 1300, 1400 and 1500 on Assessors Map No. 16-04-20-00.

The county finds, however, that even if those parcels were not being acquired by the Department of Corrections and were still available for industrial use, none of those parcels could reasonably accommodate Country Coach's needs for expansion. Those parcels are located more than three miles south of the Country Coach campus. Each of those parcels presents the same transportation and energy issues as those in the first and second areas discussed immediately above, including the need to move materials and employees over main line railroad crossings.

3.1.2.3 OAR 660-004-0020(c)

The long-term environmental, economic, social and energy consequences resulting from the use at the proposed site with measures designed to reduce adverse impacts are not significantly more adverse than would typically result from the same

proposal being located in other areas requiring a Goal exception.

The long-term environmental, economic, social and energy consequences resulting from the use of the proposed site are less adverse than would typically result from the same proposal being located in areas requiring a goal exception other than the proposed site. The analysis of Country Coach's business operations explains how expanding upon adjacent land is the most efficient and economically feasible option for its expansion. Less traffic would be generated, less energy would be used and less pollution would be created than would occur if Country Coach were required to expand onto a non-adjacent satellite site. Expansion onto a satellite site would result in ineffective use of multiple employees' and supervisors' time in transit, unnecessary fuel consumption, and wear and tear on public roads during the transport of parts and materials between the existing facility and a satellite site. The exception area makes reasonable use of economies of scale that cannot be provided in any other area of Junction City.

3.1.2.4 OAR 660-004-0020(d)

"The proposed uses are compatible with other adjacent uses or will be so rendered through measures designed to reduce adverse impacts". The exception shall describe how the proposed use will be rendered compatible with adjacent land uses. The exception shall demonstrate that the proposed use is situated in such a manner as to be compatible with surrounding natural resources and resource management or production practices. "Compatible" is not intended as an absolute term meaning no interference or adverse impacts of any type with adjacent uses.

The northerly and westerly boundaries of the proposed exception area abut portions of the easterly and southerly boundaries of the existing Country Coach campus. Expansion of the Country Coach manufacturing facilities onto the exception area would necessarily be compatible with the uses on the adjacent Country Coach campus.

The land abutting the southerly and easterly boundaries of the proposed exception area would remain in agricultural use. The uses on the current Country Coach campus have been compatible with the agricultural uses abutting the easterly and southerly boundaries of the factory campus throughout its existence and no reason has been identified that would indicate that the existing compatibility would be altered by an expansion and continuation of the same use in the exception area.

3.1.3 Goal 3 - Agricultural Land.

To preserve and maintain agricultural lands.

Based upon the findings and reasoning contained in the preceding section, the county finds that

reasons exist under the Goal 2 criteria for an exception to be taken to Goal 3.

3.1.4 Goal 4 - Forest Lands.

To preserve forest lands for forest use.

Goal 4 is not applicable. There has previously been a legislative determination by the city, as embodied in its acknowledged Comprehensive Plan, that the subject property is not forest land. This determination is validated by the fact that there are no forest resources on the subject property, there are no lands within the subject property that fall within the definition of forest land, and the soils of the subject property (Conser silty clay loam, Malabon silty clay loam and Salem gravelly silt loam) have no designated Douglas Fir site index.

3.1.5 Goal 5 - Open Space, Scenic and Historic Areas, and Natural Resources.

To conserve open space and protect natural and scenic resources.

Goal 5 is not applicable. There has previously been a legislative determination by the city, as embodied in its acknowledged Comprehensive Plan, that no Goal 5 resources exist on subject property. The subject property has not been included in any inventory of needed open space or scenic areas defined by Goal 5, nor has it been identified in the Comprehensive Plan as having any historic, cultural or natural resources which need to be preserved and/or protected. The proposed amendments will not conflict with any Goal 5 resources.

3.1.6 Goal 6 - Air, Water and Land Resources Quality.

To maintain and improve the quality of the air, water and land resources of the state.

Both Junction City and Lane County have sufficient regulatory measures in place to ensure that existing land use activities, as well as any future development on the site, will not produce any unanticipated impacts resulting from the proposed amendments.

The Lane Regional Air Pollution Authority (LRAPA) regulates the Lane County air shed and the industries within it. Its permit system for emissions provides the regulatory measures that maintain the carrying capacity and quality of the air shed consistent with applicable state and federal environmental quality standards. Country Coach currently operates under permits granted by LRAPA regarding VOC (for its painting systems) and particulate matter (for its fiberglass system). LRAPA is currently processing Country Coach's application for a Title V emissions permit. The proposed amendments will result in an expansion of current operations, and will not

result in new operations or systems requiring additional emission permits. The proposed amendments will not produce results that will be in conflict or inconsistent with the purpose and intent of Goal 6.

3.1.7 Goal 7 - Areas subject to Natural Disasters and Hazards.

To protect life and property from natural disasters and hazards.

The city of Junction City is a participant in the National Flood Insurance Program. A Final Flood Insurance Study, City of Junction City (Community Number 410124), has been released by the Federal Flood Insurance Administration. As a part of that study of Junction City, areas of inundation during a 100-year flood have been delineated on a flood boundary map. Information provided by the study shows that the subject property is subject to inundation during a 100-year flood and the Flood Insurance Rate Map depicts the subject property as within a special flood hazard area.

The Junction City Comprehensive Plan discusses the importance of reducing or eliminating flood damage. The plan describes the city's participation in the National Flood Insurance Program and the importance of a flood protection ordinance to provide appropriate safeguards to protect life and property from flood hazards. The city implemented the direction of the Comprehensive Plan through its recently adopted Flood Hazard Protection Ordinance which provides for protection of development within the flood hazard area. The ordinance requires the approval of a development permit for any structure built within the flood hazard area. The ordinance also requires that the minimum height of the lowest floors of a structure, built in special hazard areas requiring a development permit, shall be elevated and built or flood-proofed one foot above the base flood elevation. The ordinance further requires that water systems and sanitary sewer systems and connections be designed to minimize or eliminate infiltration of flood waters into the system and discharges from the system into flood waters. A development permit consistent with the Comprehensive Plan policies as administered by the Flood Hazard Protection Ordinance will be required before any construction can occur on the subject property. Junction City's Comprehensive Plan policies and its implementing ordinance are consistent with the intent and purposes of Goal 7.

3.1.8 Goal 8 - Recreational Needs.

To satisfy the recreational needs of the citizens of the state.

There has been a legislative determination by the city, through its Comprehensive Planning process, that the subject property is not needed for recreational facilities or opportunities. Identified recreational needs have been provided for on other sites within the Junction City urban area. The proposed amendments are consistent with Goal 8.

3.1.9 Goal 9 - Economy of the State.

To diversify and improve the economy of the state.

In 1994, Junction City received Periodic Review Approval (Order #00046) from the Oregon Department of Land Conservation and Development. The order determined that Junction City had met all of the necessary requirements for Periodic Review of its Comprehensive Plan and land use regulations, including its inventory of industrially-designated land necessary for existing and future industrial land use needs. The Land Use Element and the Economic Element of the Comprehensive Plan both contain policies encouraging economic development and diversification, particularly in the industrial sector.

The State of Oregon has significantly impacted Junction City's ability to fulfil those policies by its decision to build and operate a medium-security corrections facility on land within the city's Urban Growth Boundary designated for industrial use and included in the city's inventory of industrially-designated land necessary to meet existing and future industrial land use needs. The Department of Corrections has purchased or is in the process of acquiring by condemnation 85.86 acres of land at the southern edge of Junction City's Urban Growth Boundary as the site for the new facility. The conversion of that land from industrial use to public facilities use reduces Junction City's inventory of land available for industrial use. The land that the state will convert to public use represents 28% of Junction City's inventory of undeveloped industrial land. Approval of this application will only add back 17.5 acres of industrial land to Junction City's inventory and will assist the city in fulfilling the policies of its Comprehensive Plan. Nevertheless, for the reasons discussed in the above findings and reasoning addressing Goal 2 consistency, even if 85.86 acres of industrially designated land were not being acquired by the Department of Corrections and were still available for industrial use, none of those parcels could reasonably accommodate Country Coach's needs for expansion.

Furthermore, Goal 9 is interpreted in OAR 660, Division 9, Industrial and Commercial Development. Each metropolitan area is required to develop an "economic opportunities analysis." OAR 660-009-0015(2) provides:

Site Requirements. The economic opportunities analysis shall identify the type of sites that are likely to be needed by industrial and commercial uses which might expand or locate in the planning areas. Types of sites shall be identified based on the site requirements of expected uses. Local governments should survey existing firms in the planning area to identify the types of sites which may be needed for expansion.

Goal 9 recognizes that a city should expand its urban growth boundary when there is a demonstrated need for additional urban industrial land that cannot be provided within it. The above quoted administrative rule specifically recognizes the importance of planning for and

addressing the expansion needs of existing industries in the city. The above findings and reasoning addressing Goal 2 consistency contain a discussion of Country Coach's business expansion needs, and particularly its need for adjacent land. Those findings and reasoning demonstrate that Country Coach must address its business expansion needs by enlarging its manufacturing facility and that expansion onto adjacent lands is unquestionably its best operational option, as well as the best option for the entire community.

The proposed amendments are consistent with the intent and purpose of Goal 9.

3.1.10 Goal 10 - Housing.

To provide for the housing needs of the citizens of the state.

The subject property has been legislatively determined through the Junction City Comprehensive Plan to be either unneeded or unsuitable for residential use, primarily because of long-established industrial use in the area. There are no dwellings on the property and no dwellings will be built or displaced as a direct consequence of the proposed amendments. The proposed amendments will not measurably impact the existing or future housing stock in the Junction City urban area, nor will they directly result in population growth or increase the demand for housing beyond previously acknowledged projections, or otherwise conflict with the purpose and intent of Goal 10.

3.1.11 Goal 11 - Public Facilities and Services.

To plan and develop a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban development.

Within the Junction City urban area, public facilities and services are provided by the city and special districts. Policies concerning the coordination, timing and location of public facilities and services within the city and surrounding urban growth area are contained within the Public Facilities Element of the city's Comprehensive Plan. The plan provides that all of the city's public facilities and service systems are adequate to meet the city's projected needs through the year 2015. New information has become available since the last comprehensive update of the Comprehensive Plan relating to the availability of water and wastewater services. This information is summarized below. The city still reaches the conclusion that it has adequate capacity in both water and wastewater systems, based on planned improvements, to serve Country Coach's expansion and anticipated growth elsewhere in the city through the year 2015.

Water Capacity: The city is currently experiencing difficulties with two wells, and as a result, water production capacity is about 2.5 million gallons per day (as opposed to 5 million gallons cited in the application). Once repairs are made to these two wells, planned for sometime in the

next year or two, capacity for water production will be closer to 4.5 million gallons per day. The city has contracted with an engineer to develop a 20-year water master plan. The plan is expected to be completed within the next few months and it will set forth a program to ensure a 20 year supply of water.

Wastewater Capacity: The city has entered into a Mutual Agreement and Order (MAO) with DEQ setting forth a timeline and process through which the city will make improvements to its wastewater treatment plant in order to comply with federal and state requirements. The city has invested significant resources to develop a plan for making improvements that will meet state and federal requirements and provide capacity to serve the 20-year population projection. The city's Wastewater Facilities Plan was approved by DEQ in February 1999. Both short-term and long-term improvements will be made to the wastewater facilities plant, with all improvements required to be completed by December 2003. Once these improvements are completed, wastewater capacity will no longer be an issue. Until that date, the city will continue to operate its wastewater treatment facilities under the MAO. The MAO does not recommend or require the city to adopt a moratorium on building permits. The city will continue to allow development under the conditions of the MAO so long as such development does not threaten the city's compliance with the MAO.

The subject property is adjacent to Country Coach's existing factory campus. Service connections from systems currently serving the existing factory can be made more efficiently to the proposed expansion site than to a satellite site. The full range of urban services appropriate for the subject property's proposed land use classification is available and can be provided in a timely, orderly and efficient manner consistent with the intent and purpose of Goal 11. This conclusion is based on consideration of the existing public service delivery systems and plans that are in place in the city that ensure the proper coordination of the types, locations and delivery of the public facilities and services necessary to support the existing and proposed urban land areas.

Lane County has questioned how stormwater runoff will be handled from the site. The existing Country Coach facility accommodates stormwater runoff pursuant to a stormwater management plan approved and permitted by the Oregon Department of Environmental Quality. The city's stormwater system currently has enough capacity to accommodate all levels of stormwater runoff from the existing facility. Prior to obtaining building and drainage permits Country Coach must demonstrate adequate provision for increased stormwater runoff. If, at the time of development, it is determined that the city's stormwater system does not contain adequate capacity to accept increased stormwater runoff from the proposed development, then Country Coach, prior to obtaining such permits, will be responsible for mitigating negative impacts on the city's system or on adjacent property.

The proposed amendments are consistent with the purpose and intent of Goal 11.

3.1.12 Goal 12 - Transportation.

To provide and encourage a safe, convenient and economic transportation system.

OAR 660-012-0060(1) provides:

"Amendments to functional plans, acknowledged comprehensive plans, and land use regulations which significantly affect a transportation facility shall assure that allowed land uses are consistent with the identified function, capacity, and level of service of the facility."

The county finds that, based upon a study prepared by the traffic engineering firm JRH captioned "Addendum - Transportation Planning Rule Evaluation", dated September 13, 1999, the proposed amendments, with accompanying mitigation measures, will not significantly affect the intersection of Highway 99 and 1st Avenue. The Oregon Department of Transportation has concluded that, in the year 2020, the intersection will be operating at a volume to capacity ratio of .84 which exceeds the department's minimum performance standard of .80. The proposed amendments would result in an increase in the ratio to .87, requiring mitigation of impact. Mitigation, in the form of creating additional exclusive east and west left turn lanes on 1st Avenue, will eliminate the performance degradation resulting from the proposed amendments and reduce the ratio to .79. That mitigation will also address concerns expressed by Lane County regarding the level of service of 1st Avenue. By county standards the intersection is currently operating at LOS "F" and the mitigation will improve operation performance to LOS "C".

Lane County has commented regarding the number and positioning of access points from the existing factory campus to 1st Avenue. The JRH study concludes that the impact resulting from the proposed amendments will not cause 1st Avenue, east of the intersection with Highway 99, to fall below LOS "D". Lane County has established LOS "D" as the minimum acceptable level of service for county roads. The proposed amendments will not reduce the performance standards of 1st Avenue east of the intersection below the minimum acceptable level identified by Lane County and, therefore, will not significantly affect 1st Avenue as defined in the Transportation Planning Rule.

The proposed amendments are consistent with the purpose and intent of Goal 12.

3.1.13 Goal 13 - Energy Conservation.

To conserve energy

The subject property is situated adjacent to the current Country Coach factory campus and the established urbanized area where any subsequent development will promote the efficient energy-related use of existing and planned transportation facilities.

The subject site is free of any significant physical constraints that would otherwise require more

energy to develop and use the land for industrial operations than would other property within the existing Urban Growth Boundary, or other property that might alternatively be included in the Urban Growth Boundary. Major public facilities and services are already serving the Country Coach campus which reduce the energy-related inefficiencies associated with extending such services beyond an established urban area. Furthermore, specific energy conservation policies and development standards are included within both the Lane County and Junction City comprehensive plans and their respective land use ordinances to ensure that the statewide energy conservation goal is implemented on a site-specific basis at the time of property development. For the reasons discussed in the findings addressing Goal 2 consistency, significant energy savings will be realized by allowing Country Coach to expand its factory operations onto an adjacent site rather than at a satellite location.

The proposed amendments are consistent with the purpose and intent of Goal 13.

3.1.14 Goal 14 - Urbanization.

To provide for an orderly and efficient transition from rural to urban land use.

Goal 14 requires changes in a city's urban growth boundary to be based upon the following seven rural to urban conversion factors:

- (1) *Demonstrated need to accommodate long-range urban population growth requirements consistent with LCDC goals;*
- (2) *Need for housing, employment opportunities, and livability;*
- (3) *Orderly and economic provision of public facilities and services;*
- (4) *Maximum efficiency of land uses within and on the fringe of the existing urban area;*
- (5) *Environmental, energy, economic and social consequences;*
- (6) *Retention of agricultural land as defined, with Class I being the highest priority for retention and land with Class VI soils being the lowest priority; and*
- (7) *Compatibility of the proposed urban uses with nearby agricultural activities.*

3.1.14.1 Conversion Factor No. 1.

Demonstrated need to accommodate long-range urban population growth requirements consistent with LCDC goals.

The Junction City Comprehensive Plan and Urban Growth Boundary were amended pursuant to Periodic Review procedures in 1993 and were acknowledged by DLCD in March, 1994. In accordance with statewide planning goals, the Urban Growth Boundary was drawn to contain sufficient land to accommodate projected urban growth to the Year 2015. In the past two years, Junction City's inventory of industrially-designated land available for development has been impacted by the Department of Corrections' decision to acquire 85.86 acres of industrially designated land within the city's Urban Growth Boundary. Acquiring this land will enable the department to construct and operate a medium security corrections facility. The department's decision was made without consideration of the city's Comprehensive Plan, pursuant to authority granted to the department by the Oregon Legislature. The facility's site will eventually be removed from the city's industrial lands inventory. This reduction in the inventory will impact the city's ability to accommodate projected urban growth. Approval of the subject application would add back 17.5 acres to the industrial lands inventory. The addition of 17.5 acres of industrial land to the inventory, and the subsequent industrial development thereon, will assist the city in recovering a portion of its lost ability to accommodate urban growth.

Furthermore, the county finds that Conversion Factor No. 1. is satisfied irrespective of the Department of Corrections acquisition because Country Coach must address its needs by enlarging its manufacturing facility, expansion onto adjacent lands is its best operational option and in the best interest of the city, and the proposed amendments will assist the city in accommodating its long-range population growth requirements consistent with LCDC goals.

3.1.14.2 Conversion Factor No. 2.

Need for housing, employment opportunities, and livability.

The proposed amendments will have no impact upon the ability of Junction City to accommodate existing or future housing needs. The conversion of the subject property to industrial use will not affect existing or future housing stock and will not directly result in an increase in population growth or housing needs unanticipated by policies of the Comprehensive Plan.

With respect to employment, the above findings addressing Goal 9 (Economy of the State) show that the proposed amendments help to satisfy the need for employment opportunities. Approximately, 200 jobs will be added to the employment base of Junction City as a result of the proposed amendments. The loss of those 200 jobs and possibly the entire business of Country Coach is a possible result if the proposed amendments are not made. The city's livability will be significantly affected if Country Coach is no longer a contributing part of it.

The county finds that the proposed amendments are consistent with the city's need for housing,

employment opportunities and livability.

3.1.14.3 Conversion Factor No. 3.

Orderly and economic provision of public facilities and services.

Within the Junction City urban area, public facilities and services are provided by the city of Junction City and several special districts. Policies concerning the coordination, timing and location of public facilities and services within the city and surrounding urban growth area are contained within the Public Facilities and Land Use Elements of the Junction City Comprehensive Plan. The Comprehensive Plan provides that all public facilities and services are adequate to meet the city's urban growth needs through the year 2015. Additional findings regarding provision of public facilities are made in the preceding findings addressing Goal 11. Extension and provision of these services to the subject property will not adversely impact the present or future provision of public facilities and services in the Junction City urban area. The full range of urban services appropriate for the subject property's proposed urban classification is available to the existing Country Coach campus.

3.1.14.4 Conversion Factor No. 4.

Maximum efficiency of land uses within and on the fringe of the existing urban area.

The subject property is contiguous to the Urban Growth Boundary and is located within the city limits. It is adjacent to the existing Country Coach factory campus. An analysis of Country Coach's current manufacturing operation and its business expansion needs was provided by Country Coach. The analysis shows that enlarging the manufacturing facility is necessary and that expansion onto adjacent land is the most efficient land use and operational option for Country Coach. Policies contained in the Junction City Comprehensive Plan Land Use Element provide for the appropriate designation and location of land uses throughout the urban area. The plan provides for industrial districts and policies encouraging committing additional industrial land to uses in areas compatible with surrounding land uses. Plan policies further encourage existing industry to expand onto adjoining lands. Expansion of this existing industrial use onto the adjoining 17.5 acres as proposed is consistent with Comprehensive Plan policies and is consistent with the intent and purpose of Goals 11, 12, 13 and 14.

3.1.14.5 Conversion Factor No. 5.

Environmental, energy, economic and social consequences.

Each of these consequences of amending the Urban Growth Boundary have been discussed in preceding sections of these findings. Findings regarding the same types of consequences identified in Conversion Factor No. 5 are made in preceding findings addressing Goals 5, 6, 7, 9, 10 and 13.

3.1.14.6 Conversion Factor No. 6.

Retention of agricultural land as defined, with Class I being the highest priority for retention and land with Class VI soils being the lowest priority.

The proposed amendments will convert agricultural land to urban uses. The above findings support the reasons why the conversion of 17.5 acres of agricultural land is necessary and how the result of the conversion is beneficial to the community. The demonstrated need and benefits associated with Country Coach's business expansion provide appropriate reasoning to support the conversion of agricultural land in this particular case. The consequences of the proposed amendments are consistent with the overall intent and purposes of the statewide planning goals.

ORS 197.298 describes the priorities for including land within an urban growth boundary. The city has not designated any urban reserve land, so the land identified as the first priority for urban growth boundary expansion under ORS 197.298(1)(a) is not available. All lands in the Junction City area that are available as alternatives to the subject property have been addressed in previous sections of these findings. Those findings demonstrate that the types of land identified as second and third priority for an urban growth boundary expansion under ORS 197.298(1)(b) and (c) are inadequate to accommodate Country Coach's expansion. Those findings also demonstrate that the subject adjacent site, which is identified as fourth priority land under ORS 197.298(1)(d), is the only suitable site for Country Coach's expansion and that the expansion cannot be reasonably accommodated on higher priority lands.

3.1.14.7 Conversion Factor No. 7.

Compatibility of the proposed urban uses with nearby agricultural activities.

Country Coach has operated its business adjacent to agricultural land for nearly 20 years without conflict. When the manufacturing facility is expanded onto the subject property it will mirror the existing facility in all respects. No incidents or matters of incompatibility between the operation of Country Coach's business and adjacent agricultural uses have occurred or been documented in the past. No reasons exist to suggest that incompatibility will result from the proposed amendments.

3.1.15 Goals 15, 16, 17, 18, and 19

Goals 15, 16, 17, 18, and 19 are inapplicable.

4.0 CONCLUSION

The purpose of this application is allow Country Coach to expand its manufacturing facility onto adjacent land, which requires a small, 17.5 acre expansion of the Junction City Urban Growth Boundary. This application to amend the Junction City Comprehensive Plan and Urban Growth Boundary demonstrates that all applicable criteria have been addressed and met. This application demonstrates that the proposed amendments are consistent with applicable Statewide Planning Goals. Finally, it demonstrates that the proposed amendment of the city's urban growth boundary is consistent with applicable county criteria.

MEMORANDUM

TO: Lane County

FROM: Steve Cornacchia, of attorneys for applicant Country Coach, Inc.

DATE: October 12, 1999

RE: Country Coach, Inc.
UGB Amendment and Zone Change
CPA/RZ 99-02

The following revision to Exhibit B (Findings of Fact) is hereby provided for the record in the above-captioned matter. The revision of section 3.1.11 (Goal 11 - Public Facilities and Services) is as follows:

3.1.11 Goal 11 - Public Facilities and Services.

Lane County has questioned how stormwater runoff will be handled from the site. The existing Country Coach facility accommodates stormwater runoff pursuant to a stormwater management plan approved and permitted by the Oregon Department of Environmental Quality. The city's stormwater system currently has enough capacity to accommodate all levels of stormwater runoff from the existing facility. Prior to obtaining building and drainage permits Country Coach must demonstrate adequate provision for increased stormwater runoff. If, at the time of development, it is determined that the city's stormwater system or the county's roadside ditch network does not contain adequate capacity to accept increased stormwater runoff from the proposed development, then Country Coach, prior to obtaining such permits, will be responsible for mitigating negative impacts on the city's system, county's ditch network or on adjacent property.