

3. *Designation Criteria. Land and water areas designated within this overlay district include Crow Creek and significant wetlands.*

a. *All perennial streams, including Crow Creek, shall have a riparian corridor (building setback area) of 50 feet from the top-of-bank.*

b. *Significant wetlands, based on delineations approved by the Division of State Lands (DSL).*

c. *Wetland mitigation sites approved by the Division of State Lands (DSL).*

There are no perennial streams on the subject property. However, probable and potential wetland areas have been identified on the property.

Before Country Coach is allowed to develop the property, it will be required to delineate the wetlands. With respect to any identified wetlands that the company proposes to fill in connection with the development, fill permits will be required from the Division of State Lands (DSL) and the U.S. Army Corps of Engineers (ACOE). Also, any on-site wetland mitigation areas will be approved in connection with the DSL/ACOE permitting process.

Section 4 of the city's SCWD ordinance requires that wetlands proposed to be retained on the site and on-site wetland mitigation areas approved by the DSL must be surveyed. Those surveyed areas then become subject to the SCWD overlay zone. The overlay zone protects those wetland areas by requiring a Stream Corridor and Wetland District Development Permit for any development on a site that is within or partially within the SCWD. Approval of that permit is subject to review by the city's Planning Commission. (See Section 2 of the SCWD and Section 111 of the city's Zoning Ordinance, Table 111(A)(5).) The standards for development of a site that is within or partially within the SCWD are described in Section 6 of the SCWD. Those standards assure that significant wetlands and wetland mitigation areas on the site will be protected.

In short, the city's SCWD overlay zone fulfils the requirements of Goal 5 with respect to the protection of wetlands on the subject property.

Goal 6: Air, Water and Land Resources Quality.

Goal 6: "To maintain and improve the quality of the air, water and land resources of the state."

Goal 6 requires that air, land and water resources of the state be maintained and improved by assuring that future development, in conjunction with existing development, does not violate applicable state and federal environmental quality standards, and does not exceed the carrying capacity of local airsheds, degrade land resources, or threaten the availability of such resources. Both Junction City and Lane County have sufficient regulatory measures in place so as 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.

Section 4 of the city's Zoning Ordinance requires that all development within the city adhere to (1) state and federal air quality standards; (2) state and federal clean water regulations; (3) state noise regulations; and (4) state and federal solid and hazardous waste regulations. Also, Section 53 of the city's Zoning Ordinance prohibits uses in the Light Industrial Zone that create a nuisance because of noise, smoke, odor, dust or gas.

The city's Stream Corridor and Wetland District, which is an overlay district, maintains and improves the quality of the water by protecting significant wetland and wetland mitigation areas.

The Lane Regional Air Pollution Authority (LRAPA) regulates the Lane County airshed and the industries within it. Its permit system for emissions provides the regulatory measures that maintain the carrying capacity and quality of the airshed consistent with applicable state and federal environmental quality standards. Country Coach currently operates under a Title V Operating Permit issued by LRAPA that permits and regulates emissions generated by (1) painting and coating of coaches, chassis and coach parts; (2) cabinet finishing; (3) fiberglass lamination; (4) miscellaneous volatile organic compounds (VOC) usage; (5) fiberglass finishing; (6) woodworking (particulate matter control); (7) welding and other Aggregate Insignificant Activities; and (8) roads and parking areas. When Country Coach expands its operations onto the proposed expansion site, it will be required to obtain a modification of its existing permit or a new permit to assure that its operations continue to comply with applicable state and federal air standards.

In short, the proposed amendments will not produce results that will be in conflict with or inconsistent with the purpose and intent of Goal 6.

Goal 7: Area Subject to Natural Disasters and Hazards.

Goal 7: "To protect people and property from natural hazards."

Earthquake risks have been addressed by the city's adoption of building specialty codes (including the Oregon Structural Specialty Code) that include requirements designed to mitigate earthquake risks. (See Junction City Ordinance 990.)

The only identified natural hazard associated with the subject property is the 100-year flood hazard. The city is a participant in the National Flood Insurance Program. The Federal Flood Administration released A Final Flood Insurance Study, City of Junction City (Community Number 410124). The entire site of the expansion area is in the 100-year floodplain.

The city's Comprehensive Plan policies and its implementing Flood Hazard Protection Ordinance regulate development in flood-hazard areas to address the requirements of Goal 7 with respect to flood hazard areas, and any development occurring within the subject property must be consistent with the criteria set out in the Flood Hazard Protection Ordinance. Accordingly, the proposed amendments are consistent with Goal 7.

Goal 8: Recreational Needs.

Goal 8: " To satisfy the recreational needs of the citizens of the state and visitors and, where appropriate, to provide for the siting of necessary recreational facilities including destination resorts."

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. (See Section 8. of the city's Comprehensive Plan.) The proposed amendments are therefore consistent with Goal 8.

Goal 9: Economic Development.

Goal 9: "To provide adequate opportunities throughout the state for a variety of economic activities vital to the health, welfare, and prosperity of Oregon's citizens."

Goal 9 is intended to be applied on an urban area-wide basis and requires that future economic growth be accommodated, in part, by ensuring that there is sufficient suitable land planned and zoned for commercial and industrial uses.

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 industrial land inventory analysis contained in the city's 1994 acknowledged Comprehensive Plan was revisited and revised in 2001 in connection with the city's approval of Ordinance No. 1094 (the Oaklea Ordinance) on June 27, 2001. The text amendments and revised inventory analysis were based on population and employment estimates that were generated by the Lane Council of Governments (LCOG) and incorporated into the Comprehensive Plan when the city approved its 1996 Transportation System Plan.

The revised buildable lands inventory analysis reached the following conclusions with respect to the supply of and need for industrial land:

1. That the buildable industrial land supply within the Urban Growth Boundary is 439 acres;
2. That the supply of industrial land needed through the year 2020 is 67.9 acres; and
3. That (prior to approval of the Oaklea Ordinance) there is a 371-acre surplus of buildable industrial land.

Those conclusions were then used to justify the re-designation of 202 acres of the Oaklea site from Professional/Technical (an industrial land use category) to a variety of non-industrial designations. Accordingly, after enactment of the Oaklea Ordinance, the industrial land inventory reflected in Appendix A-1 to the ordinance was reduced by 202 acres. After that reduction, there remained 237 acres of buildable industrial land, a stated need of 67.9 acres to meet projected population and employment needs through the year 2020, and a deemed surplus of 169.1 acres.

A review of the property that comprises the 229-acre buildable industrial land inventory reveals, however, that the calculator and paper exercise that results in the 169-acre surplus does not reflect the realistic use of any of those 229 acres by County Coach. While a surplus of buildable industrial land may exist on the paper of the plan, it does not exist on the ground that County Coach must consider for its expansion needs for the reasons discussed immediately below. The available 229 acres are located in three areas:

1. The 70-acre Oaklea site that is located to the west of the current city limits;
2. The approximately 155 acres that are available within the industrial corridor that extends south from the current city limits to the Milliron prison site.
3. The approximately 3.4 acres that are available within the current city limits.

None of those areas is suitable for Country Coach's expansion needs.

With respect to the 70-acre Oaklea site that retained a Professional/Technical use designation after enactment of the Oaklea Ordinance, although the Professional/Technical designation is an industrial designation, that designation and the implementing zoning does not allow Country Coach's motorcoach manufacturing use. Furthermore, even if that designation did allow Country Coach's manufacturing use, the site would be unsuitable because of its remote location and the surrounding land uses and planned land uses.

With respect to the approximately 155 acres that are available in the city's Area 5 industrial corridor that extends south from the current city limits to the Milliron prison site, there are two areas within that corridor that contain buildable lands. The unsuitability of the two buildable land areas within that industrial corridor to meet Country Coach's expansion needs is discussed below:

Both areas are outside the city limits and neither area is currently served by city water or sewer. Water and sewer services are proposed to be extended through that industrial corridor when the Department of Correction's (DOC) new facilities are constructed, but the date for completion of those facilities continues to be extended. The DOC's most recent forecast (October, 2004) further extended the forecasted completion date to July 2010. It will be many years before urban services are available to those areas and Country Coach's immediate expansion

needs cannot be timely accommodated within those areas, even if the areas were otherwise suitable.

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 that area, but all are smaller than nine acres. None of the parcels is large enough to accommodate Country Coach's needs and none is adjacent to its current factory campus. Each would require the company to incur significant additional overhead costs. Each would create profound inefficiencies in the company's operations and would result in substantial unnecessary transportation and energy costs to move employees and materials between the existing factory campus and the remote parcel. Each would involve movement of employees and materials across mainline 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. None of those parcels are large enough to accommodate Country Coach's needs, and 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 economic, transportation and energy issues as those identified in the first area discussed immediately above, including the need to move materials and employees over mainline railroad crossings, and none of those parcels can reasonably accommodate Country Coach's expansion needs.

Finally, with respect to the approximately 3.4 acres that are available within the current city limits, that land is also entirely unsuitable. Specifically, the area is less than five acres in size and cannot possibly accommodate the company's expansion needs. Also, the site is nine city blocks north of the existing Country Coach campus and cannot meet the adjacency requirement for the expansion.

In summary, the conclusion set out in the city's Comprehensive Plan text (as modified by the Oaklea Ordinance) that the city has a current surplus of buildable industrial land does not reflect the reality that none of the land included in the inventory is suitable for Country Coach's expansion needs.

Since the inventory of industrial land within the current Urban Growth Boundary is not suitable to meet Country Coach's expansion needs, it is appropriate for the city to expand its Urban Growth Boundary to satisfy the requirements of Goal 9. Specifically, Goal 9 is interpreted in OAR 660, Division 9, Industrial and Commercial Development. That division requires that each metropolitan area 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. Furthermore, the above quoted administrative rule specifically recognizes the importance of planning for and addressing the expansion needs of existing industries in the city.

Consistent with the above, the city's Comprehensive Plan also recognizes the importance of providing opportunities for existing industry to expand onto adjoining lands instead of relocating outside of the community. Specifically, the city's Comprehensive Plan provides for the following policy in Chapter 3, Section C.1:

Two light industrial firms have expanded to the point that they must either expand their existing plant sites or relocate outside the community.

It is a policy of this plan to encourage existing industry to expand onto adjoining lands. Where land use constraints exist due to the proximity to residential areas, siting standards shall be employed to permit the continued peaceful occupancy of adjacent dwellings.

Country Coach must address its business expansion needs by enlarging its manufacturing facility and that expansion onto adjacent land is unquestionably its best operational option, as well as the best option for the entire community.

The company is the city's largest employer and one of Lane County's largest employers with over 1600 active full time employees. The company's payroll for 2004 exceeded \$43,000,000. The company's combined withholding taxes, unemployment taxes, Lane Transit District taxes, Oregon income tax and local property taxes totaled approximately \$4,547,000. Furthermore, the company's capital investment in the new proposed manufacturing facility will exceed \$15 million just for the first phase.

However, the company's powerful economic contribution to the area and the state is not limited to just the company's \$43,000,000 payroll, the capital expenditures related to the proposed expansion, or the taxes paid by the company. The company is also a major contributor to the economic vitality of the area because of its significant purchases of goods and services from local vendors. For example, during 2004, the company's purchases from Junction City businesses exceeded \$10,000,000, and the company's purchases from Eugene area businesses exceeded \$40,000,000, thereby creating more jobs and investment and generating more tax revenue in the area than what is represented just by the company's direct payroll, taxes and investments. This effect is known as the "multiplier" effect. The "multiplier" effect is described in *Securing America's Future: The Case for a Strong Manufacturing Base*, a study prepared by Joel Popkin and Company, Washington, D.C. (June 2003) (the Popkin Study), as follows:

“The manufacturing sector is the heart of the innovation process not only because of its direct role in producing and commercializing innovations but also because its direct and substantial linkages to other sectors spread those impacts throughout the economy. These linkages work both backward to mining and other raw material producing sectors, and forward into the transportation and trade sectors that are delivering the goods to final consumers. Thus, as manufacturing output grows it requires more inputs, and in turn spurs the creation of jobs, investments, and innovations in other sectors of the economy. This effect can be quantified in a number, referred to as a “multiplier,” that shows how much intermediate and final output is generated by a dollar's worth of final demand for manufactured products.”

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

Country Coach's sales during 2004 exceeded one-quarter of a billion dollars. The company estimates that nearly 80% of those sales were made to consumers who reside outside of Oregon, thereby bringing dollars into the state. The economic “multiplier” effect generated in this community by the company's sales and employment is enormous. Clearly, allowing the company to expand onto adjacent land as proposed would help foster economic activity that is vital to the health, welfare, and prosperity of local citizens and the state. Accordingly, the proposed amendments are entirely consistent with the intent and purpose of Goal 9.

Goal 10; Housing

Goal 10: " To provide for the housing needs of citizens of the state."

The primary purpose of Goal 10, within the context of amending an urban growth boundary, is to ensure that sufficient buildable land is available to provide for a full range of housing needs within the urban area and to avoid creating shortages of residential land which would artificially restrict market choices in housing type, price range or location. The subject property has been determined 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, increase the demand for housing beyond previously acknowledged projections, or otherwise conflict with the purpose and intent of Goal 10.

The proposed UGB expansion may ultimately create up to 2,000 new jobs at full build-out. However, only approximately 16% of Country Coach's current employees live in the Junction City urban area. Country Coach Comprehensive Plan Amendment and Rezoning (CPA-05-1 and RZ-05-2)

City area (based on zip code, which includes the city and surround areas), and an even smaller percentage resides in the city. There is adequate planned housing to accommodate new Country Coach employees who may decide to reside within the city.

The city's residential land inventory analysis contained in the city's 1994 acknowledged Comprehensive Plan was revisited and revised in 2001 in connection with the city's approval of the Oaklea Ordinance on June 27, 2001. The text amendments and revised inventory analysis were based on population and employment estimates that were generated by the Lane Council of Governments (LCOG) and incorporated into the Comprehensive Plan when the city approved its 1996 Transportation System Plan.

The revised buildable lands inventory analysis reached the following conclusions with respect to the supply of and need for residential land:

1. That the supply of low-density residential land within the Urban Growth Boundary was 152 acres, that the need for such land through the year 2020 was 257 acres, and that there was a deficit in this category of 105 acres through the end of the 2020 planning period.

2. That the supply of medium density residential land within the Urban Growth Boundary was 52 acres, that the need for such land through the year 2020 was 69 acres, and that there was a deficit in this category of 17 acres through the end of the 2020 planning period.

Those conclusions were then used to justify the re-designation of 183 acres of the Oaklea site from Professional/Technical to a residential designation: 165 acres were re-designated as low density residential; and 18 acres were re-designated as medium density residential. Accordingly, after enactment of the Oaklea Ordinance, the deficits of low density and medium density residential lands identified in the city's updated residential lands inventory and needs analysis were eliminated completely. As a result, Goal 10 has been satisfied by the city and the amendments proposed by this application are consistent with Goal 10.

Goal 11: Public Facilities and Services.

Goal 11: "To plan and develop a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban and rural 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 city's water supply and system can provide approximately 2,800,000 million gallons per day and that, based upon consumption factors for industry and residences, the calculated population of Junction City could reach 7,164 persons before the system would need to be expanded. The city's primary wastewater treatment system has a design capacity to serve a hydraulic population equivalent to 9,800 people. The city has adequate capacity in both systems to serve Country Coach's expansion and anticipated growth elsewhere in the city through at least the year 2015.

Country Coach is not considered a “wet” industry, meaning it does not utilize a large quantity of water as part of its manufacturing process. Currently water is used for restroom facilities, cleaning services, washing the RV’s and waste testing the integrity of coaches. New production facilities for the proposed land to be developed would utilize water at a comparable rate to current quantities.

For fire suppression and fire-fighting situations, the city’s engineer has stated that water system pressure is 61-63 psi, which ideally would be higher. In a discussion with Fire Chief Carl Perry (JCRFPD), it was expressed that Country Coach install a fire pump, on site, to help boost water pressure specifically for future fire protection.

Wastewater: The first phase of development would utilize a sanitary service line currently connected to existing facilities. The sanitary lift station associated with this service line has approached capacity, at times, in the past. However a significant change to reduce sanitary output at Country Coach is underway, which will alleviate capacity issues at the lift station. The Public Works Director indicates that potential reduction of flow into the sanitary lift station is large, enough to allow first phase of development without difficulty. Future expansions will be dependent on gravity flow to determine if an additional lift station is necessary, or if capacity improvements to the force main from the current lift station west toward the railroad tracks will be needed. Improvements related to future expansion onto the proposed land to be developed will not bring undue pressure or harm to the city’s wastewater system. Changes to the city’s service line, the one directly connected to the sanitary lift station, are possible in years to come.

Storm sewer system: There is no existing underground storm water system on the south side of River Road (E. 1st Avenue) east of the Southern Pacific railway. This has been a problem for Country Coach, specifically related to the fact that surface drainage generally travels from the southeast toward the northwest in that area. Historically Country Coach’s campus is utilized as a detention basin, to help protect other parts of the city from floodwater escaping drainage channels. A potential solution for stormwater system improvement would be utilization of on-site cleansing, detention, and possible re-routing of part of the heavy storm water flow that is problematic for the city. The plan would use vegetated swales in the parking lots, connected to drainage basins graded for maximum retention, and ultimately connection to a storm system for approval by the city.

The subject property is adjacent to Country Coach’s existing campus. Service connections from systems currently serving the existing campus 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. The proposed amendments are therefore consistent with the purpose and intent of Goal 11.

Goal 12: Transportation.

Goal 12: "To provide and encourage a safe, convenient and economic transportation system."

Pursuant to Goal 12, Junction City has adopted a Transportation System Plan (TSP).

The statewide transportation goal is generally intended to be applied on an urban area-wide basis. Specific transportation-related policies and development standards are included in the Junction City Comprehensive Plan and respective land use ordinances to assure that the intent of the statewide transportation goal is implemented through the application of both state and local policies and standards at the time of development. As part of its Comprehensive Plan, the city adopted its Transportation System Plan (March 2000) (the TSP). The city's TSP has been acknowledged by LCDC.

Goal 12 is also implemented through the provisions of the State Transportation Planning Rule (OAR 660, Division 12), which was adopted by LCDC in 1991 (the TPR).

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 performance standards (e.g. level of service, volume to capacity ratio, etc.) of the facility."

To determine whether the proposed amendments will significantly affect a transportation facility, the TPR lists specific criteria against which the proposed amendments are to be evaluated. OAR 660-012-0060(2) provides that a plan or land use regulation amendment significantly affects a transportation facility if it:

- (a) Changes the functional classification of an existing or planned transportation facility;*
- (b) Changes standards implementing a functional classification system;*
- (c) Allows types or levels of land uses which would result in levels of travel or access which are inconsistent with the functional classification of a transportation facility; or,*
- (d) Would reduce the level of service of the facility below the minimum acceptable level identified in the TSP (Transportation System Plan).*

JRH Transportation Engineering prepared a Traffic Impact Analysis (the JRH Study). JRH performed an analysis of potential traffic impacts of the proposed 74-acre expansion of the city's Urban Growth Boundary and re-designation of the land from an agricultural use to an industrial

use. In consultation with Lane County, Junction City, and Oregon Department of Transportation (ODOT) representatives, the following intersections were included within the study area:

Signalized Intersections:

1. 18th Avenue & Highway 99
2. 10th Avenue & Highway 99
3. 6th Avenue & Highway 99
4. 1st Avenue (River Road) & Highway 99
5. Prairie Road & Highway 99
6. Airport Road & Highway 99
7. Clear Lake Road & Highway 99
8. Belt Line westbound & Highway 99
9. Belt Line eastbound & Highway 99

Unsignalized Intersections:

1. Beacon Drive & River Road
2. Thistledown Farm & River Road
3. Lone Pine Farm & River Road

The study area intersections were evaluated under existing 2004, year 2005 no build, year 2005 build, future year 2020 no build, and future year 2020 build conditions during the AM and PM peak hours. The intersections of Beacon Drive and River Road, Lone Pine Farm and River Road, and Thistledown Farm and River Road were only evaluated during the PM peak hour.

The results of the study showed that all intersections within the study area operate acceptably under existing 2004, year 2005 no build, and year 2005 build conditions with the exception of 1st Avenue and Highway 99. The intersection of 1st Avenue and Highway 99 falls below the ODOT performance standard of $v/c = 0.80$ with full development in year 2005. However, Country Coach can develop up to 50 percent or up to 338 PM peak hour trips in year 2005 before the intersection of 1st Avenue and Highway 99 drops below standard minimums. The remainder of project trips, if fully developed in 2005, will have to be generated during an off-peak PM hour without any additional mitigation at the intersection. All other intersections within the study area operate acceptably under year 2005 build conditions.

The study further showed that all intersections under future year 2020 build conditions operate at or below year 2020 no build conditions with the exception of the following intersections:

1. 6th Avenue & Highway 99
2. 1st Avenue & Highway 99
3. Clear Lake Road & Highway 99
4. Beacon Road & River Road

However, the study also shows that without mitigation, Country Coach can develop up to four percent or 27 PM peak hour trips under the year 2020 build condition before any intersection

exceeds no build conditions. Furthermore, the study shows that Country Coach can develop up to 15 percent or 101 PM peak trips during the actual PM peak hour in year 2020 if an additional westbound left turn lane is constructed at the intersection of 1st Avenue and Highway 99. All other study area intersections continue to operate at or below no build conditions with the addition of 101 PM peak hour trips.

The study concludes that with proper mitigation, all intersections within the study area operate acceptably in future year 2020 conditions. Therefore, as defined in OAR 660-12-0060, the proposed change does not significantly affect any transportation facility with proper mitigation. Current year 2004 intersection performances comply with performance standards. Year 2005 and future year 2020 build conditions comply with performance standards with proper mitigation as described in the study.

Goal 13: Energy Conservation.

Goal 13: “Land and uses developed on the land shall be managed and controlled so as to maximize the conservation of all forms of energy, based upon sound economic principles.”

The subject property is located 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. (See discussion above under Goal 12, Transportation).

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. (See discussion above under Goal 2, Land Use Planning for additional discussion and analysis of alternative sites.)

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. Finally, 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 therefore consistent with the purpose and intent of Goal 13.

Goal 14: Urbanization.

Goal 14: "To provide for an orderly and efficient transition from rural to urban land use.

Urban growth boundaries shall be established to identify and separate urbanizable land from rural land. Establishment and change of the boundaries shall be based upon considerations of the following 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."

The seven conversion factors identified above are sometimes collectively referred to as the "establishment" factors. The first two factors are referred to as the "need" factors and the third through seventh factors are referred to as the "locational" factors.

The local government must show that each of the factors were "considered" and "balanced" by the local government in determining if a change in the urban growth boundary for a particular area is justified. The requirement that each factor must be addressed does not make the factors independent approval criteria. Accordingly, is not necessary that a designated level of satisfaction of the objectives of each of the factors must be met before a local government can justify a change in an urban growth boundary. *1000 Friends of Oregon v. Metro*, 174 Or App 406 (2001).

Conversion Factor No. 1: Demonstrated need to accommodate long-range urban population growth requirements consistent with LCDC goals.

Conversion Factor No. 1 deals with the question of whether there is a justifiable need for additional urbanizable land to be included within Junction City's Urban Growth Boundary to accommodate long range urban population growth.

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 industrial land inventory analysis contained in the city's 1994 acknowledged Comprehensive Plan was revisited and revised in 2001 in connection with the city's approval of the Oaklea Ordinance on June 27, 2001. The revised Comprehensive Plan text and revised inventory analysis enacted pursuant to the Oaklea Ordinance were attached to the Oaklea Ordinance as Appendix A-1. The text amendments and revised inventory analysis were based on population and employment estimates that were generated by the Lane Council of Governments (LCOG) and incorporated into the Comprehensive Plan when the city approved its 1996 Transportation System Plan.

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Those conclusions were then used to justify the re-designation of 202 acres of the Oaklea site from Professional/Technical (an industrial land use category) to a variety of non-industrial designations. Accordingly, after enactment of the Oaklea Ordinance, the industrial land inventory reflected in Appendix A-1 to the ordinance was reduced by 202 acres. After that reduction, there remained 237 acres of buildable industrial land, a stated need of 67.9 acres to meet projected population and employment needs through the year 2020, and a deemed surplus of 169.1 acres.

However, a review of the property that comprises the 229-acre buildable industrial land inventory reveals that none of the available inventory will accommodate Country Coach's expansion needs.

When the city's revised inventory analysis was adopted in 2001, the construction of the new prison at the Milliron site was in the city's immediate future. Development of that prison would have extended urban services, such as sewer and water, through the industrial designated corridor extending parallel with Hwy 99 and between the Southern Pacific and Burlington Northern railway tracks. Both areas are currently outside the city limits and neither area is currently served by city water or sewer. However, the date for completion of those facilities

continues to be extended further into the future. The DOC's most recent forecast (October 2004) further extended the forecasted completion date to July 2010. Therefore, even if one assumed that the industrial corridor land would accommodate Country Coach's expansion, that land is not currently available and will not be available for industrial development with urban sewer and water needs for many years. Yet, Country Coach's expansion needs are immediate and the city's need for industrial land adjacent to the company's current campus is also immediate if the city is to accommodate the city's long-range urban population growth requirements. This is true because if the city is unable to provide the needed industrial land as requested by Country Coach, the company may have no alternative but to relocate to another city or state, in which case the city's urban population growth needs may be seriously compromised.

For all of the reasons explained here, there is clearly a demonstrated need for the industrial land in the proposed expansion area consistent with Conversion Factor No. 1.

Conversion Factor No. 2: Need for housing, employment opportunities, and livability.

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, expanding the city's Urban Growth Boundary to add the industrial land needed to accommodate Country Coach's proposed expansion will have significant economic and other benefits to the community and the state. The economic importance of allowing Country Coach to expand its factory campus onto adjacent land instead of forcing the company to relocate to another city or state is also discussed in Appendix E of the application submitted. The company is the city's largest employer and one of Lane County's largest employers with over 1600 active full time employees. The company's payroll for 2004 exceeded \$43,000,000. The company's combined withholding taxes, unemployment taxes, Lane Transit District taxes, Oregon income tax and local property taxes totaled approximately \$4,547,000. Furthermore, the company's capital investment in the new proposed manufacturing facility will exceed \$15 million just for the first phase. There is also the "multiplier" effect discussed above. Part of that effect is manifested in the company's purchases from local vendors, which expenditures during 2004 exceeded \$10 million from Junction City businesses and \$40 million from Eugene area businesses. The elements of Conversion Factor No. 2. are satisfied through the proposed Urban Growth Boundary expansion to provide the needed industrial land.

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 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. The city's water supply and system can provide approximately 2,800,000 million gallons per day and that, based upon consumption factors for industry and residences, the calculated population of Junction City could reach 7,164 persons before the system would need

to be expanded. The city's primary wastewater treatment system has a design capacity to serve a hydraulic population equivalent to 9,800 people. The city has adequate capacity in both systems to serve Country Coach's expansion and anticipated growth elsewhere in the city through at least the year 2015. The city has adequate capacity in both systems to serve Country Coach's expansion and anticipated growth elsewhere in the city through at least the year 2015.

Sewer and water services cannot currently be extended to the land in the Highway 99 industrial corridor south of the current city limits in either an orderly manner or an economically feasible manner. On the other hand, the proposed Urban Growth Boundary expansion area is adjacent to Country Coach's existing factory campus. Service connections from systems currently serving the existing campus can be made to the proposed expansion site. The full range of urban services appropriate for the subject property's proposed land use classification are available and can be provided in a timely, orderly and efficient manner.

Accordingly, the considerations described in Conversion Factor No. 3 are satisfied by the proposed Urban Growth Boundary Expansion.

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 city's Urban Growth Boundary and is located entirely within the current city limits. It is adjacent to the existing Country Coach campus. 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 city's 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 land to industrial uses in areas compatible with surrounding land uses. Plan policies further encourage existing industry to expand onto adjoining lands.

Expansion of Country Coach's existing industrial use onto the adjoining 74 acres is consistent with the city's Comprehensive Plan policies and satisfies the requirements of Conversion Factor No. 4.

Conversion Factor No. 5: Environmental, energy, economic and social consequences.

Environmental Consequences.

Potential environmental consequences of the proposed amendments are discussed in the above sections addressing Goal 5 (Open Spaces, Scenic and Historic and Natural Resources), Goal 6 (Air, Water & Land Resources Quality), and Goal 7 (Natural Disasters and Hazards). As reflected in that discussion, the proposed amendments will not result in adverse environmental consequences.

Wetlands.

Probable and potential wetland areas have been identified on the property. Before Country Coach is allowed to develop the property, it will be required to delineate the wetlands. With respect to any identified wetlands that the company proposes to fill in connection with the development, fill permits will be required from the Division of State Lands (DSL) and the U.S. Army Corps of Engineers (ACOE). Also, any on-site wetland mitigation areas will be approved in connection with the DSL/ACOE permitting process.

Junction City enacted "Appendix G" to its zoning ordinance, which creates a Stream Corridor and Wetland District (SCWD). The ordinance creates an overlay district that protects perennial streams and significant wetlands. Specifically, Section 3 of the ordinance sets out the criteria for designating areas subject to the overlay district as follows:

3. *Designation Criteria. Land and water areas designated within this overlay district include Crow Creek and significant wetlands.*

a. *All perennial streams, including Crow Creek, shall have a riparian corridor (building setback area) of 50 feet from the top-of-bank.*

b. *Significant wetlands, based on delineations approved by the Division of State Lands (DSL).*

c. *Wetland mitigation sites approved by the Division of State Lands (DSL).*

The existing wetlands on the site are principally farmed wetlands. They are plowed, planted with farm crops, and have chemicals (fertilizer and pesticides) applied to them. Wetland mitigation will be required for any wetlands that are to be filled in connection with the development.

Section 4 of the city's SCWD ordinance requires that wetlands proposed to be retained on the site and on-site wetland mitigation areas approved by the DSL must be surveyed. Those surveyed areas then become subject to the SCWD overlay zone. The overlay zone protects those wetland areas by requiring a Stream Corridor and Wetland District Development Permit for any development on a site that is within or partially within the SCWD. Approval of that permit is subject to review by the city's Planning Commission. The standards for development of a site that is within or partially within the SCWD assure that significant wetlands and wetland mitigation areas on the site will be protected.

If there were otherwise suitable nonadjacent industrial sites within or adjacent to the city's Urban Growth Boundary to accommodate Country Coach's expansion, those sites would not have fewer adverse environmental consequences than the proposed adjacent site. In fact, a non-adjacent expansion site would generate more air pollution and traffic congestion associated with the transportation of materials and employees between sites than will be the case if the company is allowed to expand to the adjacent site. Expansion of the Urban Growth Boundary to include the site adjacent to Country Coach's current campus is clearly the most environmentally sound alternative.

Energy Consequences.

The subject property is located 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.

Allowing Country Coach to expand its operation onto adjacent property will result in significant energy savings compared to expansion at a satellite location.

Social Consequences.

Potential social consequences of the proposed amendments are addressed particularly in the sections addressing Goals 2, 8, 9, and 10 and the conversion factors discussed immediately above. Approval of the proposed amendments to allow Country Coach to expand its factory operations onto an adjacent site will provide beneficial social consequences. If the needed industrial land is not added to the Urban Growth Boundary, however, it is foreseeable that Country Coach will relocate its entire operation to another city or state and that the adverse social consequences to the city, the county and the state will be profound.

Economic Consequences.

Potential economic consequences of the proposed amendments are discussed in detail in the section addressing Goal 9 (Economy of the State). Significant positive economic opportunities will be created through the proposed Urban Growth Boundary expansion.

For the reasons explained above, the environmental, energy, economic and social consequences (EASE) consequences of the proposed expansion at the proposed location are positive. On the other hand, the EASE consequences associated with rejecting the proposed expansion and/or only providing industrial land for the company's expansion at a location that is not adjacent to the current factory campus are significantly adverse.

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. Conversion Factor No. 6 appears to require an analysis of the quality of the soils on proposed conversion property and possible alternative sites, with Class I soils given the highest priority for retention for agricultural use and Class VI soils (and below) given the lowest priority.

Country Coach has analyzed possible alternative expansion sites within the current Urban Growth Boundary and in the surrounding area. That analysis clearly shows why there are no other suitable sites within the city's Urban Growth Boundary that will reasonably accommodate the company's expansion needs. That analysis also clearly shows why expanding the city's Urban Growth Boundary to include resource lands that are not adjacent to the company's current campus will not accommodate the company's expansion needs. Accordingly, even if the Urban Growth Boundary could be expanded at another location so as to convert agricultural land with lower quality soils than those in the proposed expansion area, it would not be reasonable to do so because such alternative areas are not suitable for the proposed use in any event. Nevertheless, even if such alternative areas were suitable, no benefit would accrue by converting such areas instead of converting the proposed area adjacent to the company's current campus because essentially all areas that abut the city's Urban Growth Boundary are comprised of high-value farmland.

Lands with primarily Class I and II soils bound the City Limits on all sides. The principal exception involves the industrial designated corridor that extends from the city's southerly boundary to the Milliron prison site parallel with Hwy 99 and between the Southern Pacific and Burlington Northern railway tracks. Soils within that industrial corridor are still predominantly high-value (Class III) soils. However, none of the potential sites within that industrial corridor are suitable to address Country Coach's expansion needs; principally because of the remote location, poor access and the lack of reasonable availability of sewer and water service.

Country Coach has submitted a soil map prepared by the Lane Council of Governments captioned "Junction City Base Over Classified High Value Soil" that shows the "high-value" soils surrounding the city's Urban Growth Boundary by Soil Classifications 1 through 4 (the "Soil Classification Map").

The Soil Classification Map shows that the type and ratio of the soil classes on the proposed expansion site are substantially similar to the type and ratio of the soil classes on most areas that abut the city's Urban Growth Boundary. Specifically, the soils on the proposed expansion site are comprised of approximately 54% Class 1 soils, 16% Class 2 soils, and 30% Class 3 soils. Similar "high-value" soil areas comprised of predominantly Class 1 soils with some Class 2 and Class 3 soils interspersed therein abut the entire easterly Urban Growth Boundary, the northerly Urban Growth Boundary east of Oaklea Drive, and the southerly and westerly portions of the Urban Growth Boundary extending from approximately High Pass Road south to approximately one-half mile north of Milliron Road. Accordingly, whether the expansion occurs on the proposed site adjacent to the company's existing campus or on those other areas identified in this paragraph, high-value farmland comprised of predominantly the same "high-value" soil classes would be converted to an industrial use.

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. When the manufacturing facility is expanded onto the subject property it will mirror the existing facility in all respects. We find as credible evidence of compatibility the statement of the adjacent farmer, John Reerslev, who stated:

“Our company farms approximately 2200 acres in the Junction City area. For nearly 30 years, we have farmed the land located adjacent to the motor home manufacturing plant formerly operated by Monaco Coach and currently operated by Country Coach. During that time, we have grown grass seed, mint, sugar beet seed and hay on the adjacent property. Our farming operations have never been adversely impacted by the motor coach manufacturing occurring on the adjacent property. In fact, in our experience, it has been easier to farm next to the motor coach manufacturing use than next to residential areas and even next to other farms if those farms are growing different crops.”

Also, as a condition of approval, issues of compatibility with nearby agricultural activities can be mitigated with following measures (see also Goal 2 above):

Visual Buffer: vegetation buffer along southerly 200 feet of the easterly boundary of the proposed expansion property.

Noise: No significant manufacturing operations within the northerly 80 feet of the expansion site.

Setback Buffer: 80-foot building setback along the easterly boundary of proposed site.

Goal 15; Willamette River Greenway.

Goal 15: "To protect, conserve, enhance and maintain the natural, scenic, historical, agricultural, economic and recreational qualities of lands along the Willamette River as the Willamette River Greenway."

This goal is not relevant to this proposed amendment because this site is not within the boundary of the Willamette River Greenway.

Goals 16-19; Estuary Resources, Coastal Shorelands, Beaches and Dunes, and Ocean Resources.

These goals are not relevant to this proposed amendment because there are no coastal, estuarine, ocean, or beach and dune resources related to the site.

FINDINGS OF CONSISTENCY WITH THE COMPREHENSIVE PLAN

The city's Comprehensive Plan and Urban Growth Boundary have previously been acknowledged by LCDC as conforming to the Statewide Goals. For the reasons discussed above, the proposed expansion of the Urban Growth Boundary and designation of the expansion area for industrial uses are also consistent with the Statewide Goals. Accordingly, as amended, the city's Comprehensive Plan and Urban Growth Boundary will continue to conform to the Statewide Goals. This Section 5.0 demonstrates that the proposed Comprehensive Plan amendment and Urban Growth Boundary expansion are consistent with other applicable provisions of the Comprehensive Plan.

Chapter 1.

Citizen Involvement Element.

As discussed relative to Statewide Planning Goal 1, this criterion will be met by compliance with the adopted public notification and hearing processes under the Junction City Zoning Ordinance Sections 108, 111 and 112.

Chapter 2

Environmental Element.

Physical Geography: Soil

It is the policy of this plan to require the construction of sanitary sewers to reduce the potential public health hazards caused by failing absorption fields in restrictive soil conditions.

The proposed amendment supports this policy. The applicant is proposing to construct sanitary sewers to serve the site. The sewer service will be constructed as part of the development.

Floods.

The Flood Insurance Rate Map, which is part of the National Flood Insurance Program, is adopted as part of the Comprehensive Plan. It shows the subject property as entirely in the 100-year floodplain. The Flood Damage Protection Ordinance, No. 1063, ensures that development will comply with Comprehensive Plan policies to reduce or eliminate flood damage in flood prone areas. It also requires that water systems be designed to minimize or eliminate infiltration of floodwaters. It also requires that new and replacement sanitary sewer connections and systems be designed to minimize or eliminate infiltration of floodwaters into the system and discharges from the system into floodwaters.

Air Pollution.

The Comprehensive Plan includes several policies about air pollution.

It is a policy of the city that every applicant for a building permit in which the building will contain an operation or process resulting in emission of air

contaminates, shall file with the appropriate state agency an application for an air contaminant discharge permit. Further, it is a policy of the city not to issue the building permit for any building or process which must obtain an air contaminant discharge permit without first obtaining such permit or written approval from the appropriate state agency.

As stated in the Comprehensive Plan, the state (Department of Environmental Quality) has the licensing authority to grant discharge permits. However, in our area, that authority has been delegated to the Lane Regional Air Pollution Authority. LRAPA has issued Country Coach a Title V permit for its current operation, permit no. 201279. They have a pending application for modification to that permit to allow construction of Building 16 which will include three new coach-coating booths, one relocated cabinet-coating booth, and miscellaneous volatile organic compound usage. The city has been and will continue to require any necessary modifications to the Title V permit prior to issuance of any new building permits. This requirement is further supported through a condition of approval.

The Comprehensive Plan contains a policy that does not permit the location of new industry in Junction City which:

- 1. Does not encourage alternative means of transportation through mass transit or carpooling.*
- 2. Operates fuel burning equipment which requires boiler lancing or soot blowing.*
- 3. Operates equipment utilizing fuels of high ash and sulfur content.*
- 4. Operates trade waste disposal operations which emit solid particles, gas vapors or malodorous substances.*

Each of the elements of the above policy pertains to air quality. Those elements are not applicable to this application because the proposed amendments will not result in the location of a new industry in Junction City. Country Coach has operated its business at its present location since 1980. The proposed amendments will only result in an expansion of the existing manufacturing concern onto the subject property.

Nevertheless, the following discussion specifically shows that the proposed amendments conform to the listed air quality criteria.

1. Country Coach encourages employee use of alternative means of transportation. It has worked with Lane Transit District (LTD) to establish service routes for employees. A transit stop has been developed at 1st Avenue and Front Street. LTD routes, 95 and particularly 95 Express, provide convenient transit services to employees going back to Eugene.
2. Country Coach also encourages carpooling by its employees. It provides a service in its personnel office that accepts employee requests for carpools. It matches employees

living in the same area and with the same transportation desires and then places them in contact with each other.

3. Country Coach does not operate fuel burning equipment that requires boiler lancing or soot blowing.
4. Country Coach does not operate equipment utilizing fuels of high ash and sulfur content.
5. Country Coach currently operates under a Title V Operating Permit issued by LRAPA that permits and regulates emissions generated by (1) painting and coating of coaches, chassis and coach parts; (2) cabinet finishing; (3) fiberglass lamination; (4) miscellaneous volatile organic compounds (VOC) usage; (5) fiberglass finishing; (6) woodworking (particulate matter control); (7) welding and other Aggregate Insignificant Activities; and (8) roads and parking areas. When Country Coach expands its operations onto the proposed expansion site, it will be required to obtain a modification of its existing permit or a new permit to assure that its operations continue to comply with applicable state and federal air standards.

The next policy listed in the Comprehensive Plan is:

It shall be a policy of Junction City to continually assess local air quality and proposed activities which may introduce new sources of air contamination. Such an assessment will be coordinated with the appropriate state and regional agencies.

Lane Regional Air Pollution Authority (LRAPA) regulates the Lane County airshed and the industries within it. Its permit system for emissions provides the regulatory measures that maintain the carrying capacity and quality of the airshed consistent with applicable state and federal environmental quality standards. Country Coach currently operates under a Title V Operating Permit issued by LRAPA that permits and regulates emissions generated by (1) painting and coating of coaches, chassis and coach parts; (2) cabinet finishing; (3) fiberglass lamination; (4) miscellaneous volatile organic compounds (VOC) usage; (5) fiberglass finishing; (6) woodworking (particulate matter control); (7) welding and other Aggregate Insignificant Activities; and (8) roads and parking areas. When Country Coach expands its operations onto the proposed expansion site, it will be required to obtain a modification of its existing permit or a new permit to assure that its operations continue to comply with applicable state and federal air standards.

For the foregoing reasons, the proposed amendments are consistent with the Comprehensive Plan's air quality policies.

Noise

It is a goal of the city to prevent and eliminate sources of noise which prevent the peaceful occupancy of housing units.

It is the policy of Junction City to control noise pollution by implementing noise standards developed by the Department of Environmental Quality and included in the City's nuisance ordinance.

These policies are implemented through the city's Zoning Ordinance (which prohibits nuisance noise in the Light Industrial zone) and the city's noise ordinance (Ordinance No. 591, Section 15). Development within the proposed Urban Growth Boundary expansion area will be required to conform to requirements of the Zoning Ordinance and the applicable restrictions of the noise ordinance. Country Coach conducts its manufacturing operations within buildings thereby greatly mitigating most of the noise generated by those activities. Accordingly, the proposed amendments are consistent with the Comprehensive Plan's noise policies.

Agricultural Land Uses

It is a policy of the city to preserve agricultural land uses on lands adjacent to the city's Urban Growth Boundary by requiring:

Buffer zones be provided on lands within the urban growth boundary and between adjoining agricultural land uses within the county.

A. Any amendment to the urban growth boundary include data and information which satisfies the four factors described in Part II of Statewide Planning Goal 2.

B. Any amendment to the Urban Growth Boundary be for a specific land use. A time table describing the time period for conversion to urban uses will be included.

The proposed amendment supports this policy. The proposed amendments will result in the conversion of 74 acres of agricultural land to an urban industrial use. The Comprehensive Plan requires that any amendment to the Urban Growth Boundary be for a specific land use. This application seeks an amendment of the city's Urban Growth Boundary to allow Country Coach to develop the 74 acres as an extension of its existing industrial use. The proposed amendments comply with the plan requirement of a specific land use resulting from the amendments.

The easterly and southerly boundaries of the subject property abut county agricultural uses. The applicant submitted a letter from Reerslev Farms, Inc. that addresses the impacts on farm uses generated by adjacent Light Industrial motor home manufacturing. That letter states in material part:

Our company farms approximately 2200 acres in the Junction City area. For nearly 30 years, we have farmed the land located adjacent to the motor home manufacturing plant formerly operated by Monaco Coach and currently operated by Country Coach. During that time, we have grown grass seed, mint, sugar beet seed and hay on the adjacent property. Our farming operations have never been adversely impacted by the motor coach manufacturing occurring on the adjacent property. In fact, in our experience, it has been easier to farm next to the motor

coach manufacturing use than next to residential areas and even next to other farms if those farms are growing different crops.

Based on the Reerslev letter, a buffer zone should not be required to protect farm uses adjacent to motor home manufacturing facilities. Since the manufacturing operations occur within buildings and air emissions are strictly regulated by LRAPA. The applicant is proposing to preserve and enhance the natural wetland swale near the southerly boundary of the property thereby providing a natural buffer zone between the manufacturing operations and agricultural land to the south. An 80-foot building setback to be imposed as a Transportation Planning Rule Condition of Approval will provide a significant buffer between the manufacturing operations on the subject property and the agricultural land to the east. Also, an access roadway within that setback area and drainage/stormwater detention facilities proposed within that setback area will provide additional buffering.

The proposed amendment to the Urban Growth Boundary is for a specific land use, which is Light Industrial use. With respect to a timetable for conversion to urban uses, that timetable is provided in Country Coach's response to DLCD's comment letter. That timetable is summarized as follows:

As is explained in the Application and in Exhibits D and E to the Application, Country Coach has approximately doubled the size of its business in the past two years and has increased its retail market share by over 100%. At current demand trend levels, Country Coach reasonably projects full development of the 17-acre site (added to the Urban Growth Boundary in 1999) and over half of the proposed 74-acre expansion site within the next five years. As noted in the Application and as is the case with almost any manufacturing concern, product demand will fluctuate based on current economic conditions and other factors. Nevertheless, as is clearly reflected in Exhibit D to the Application, despite some "down" periods, Country Coach has experienced steady upward growth throughout its history. The retiring population of "baby boomers" bodes well for the future of Country Coach. Assuming continuous demand and market expansion based on current trends, it is not unreasonable to project full development of the entire 74-acre expansion site within the next ten to twelve years.

The Comprehensive Plan also requires that, in order to preserve agricultural land uses on lands adjacent to the Urban Growth Boundary, any amendment to the boundary include data and information which satisfies the four factors described in Part II of Goal 2. That requirement is satisfied by the findings under Statewide Planning Goal findings of this report. Based on the information submitted by the applicant and the findings under Statewide Planning Goals 2 and 3, the proposed amendment is consistent with the City's policy on Agricultural lands.

Wetlands Resource Policies

A. For wetland resource sites identified on the City's Preliminary Inventory of Wetland Resources, the City shall conduct a Goal 5 analysis when adequate resource information is available on the quantity, quality, and location of each site.

B. Prior to the issuance of a land development permit for any site listed on the City's Preliminary Inventory of Wetland Resources, the City shall refer the request to the Division of State Lands and the Army Corps of Engineers for their review and comment.

The wetlands shown on the National Wetlands Inventory is adopted as part of the Comprehensive Plan. Section VII of Chapter 2, the Environmental Element of the Comprehensive Plan states:

"The National Wetland Inventory Maps prepared by the U.S. Fish and Wildlife Service identify possible wetland resources within the Junction City Urban Growth Boundary. The specific sites are represented on the Junction City and U.S. Geological Survey quadrangle maps (U.S.F.W.S. Draft N.W.I. maps, 1989) which, by this reference, are incorporated into this section of the comprehensive plan as the City's Preliminary Inventory of Wetland Resources. Due to the lack of specific information on the hydrology, soils, and vegetation of these sites, the actual extent and value of these resources are unknown. When adequate information is available on the quantity, quality, and location of these resources, an analysis will be conducted to determine significance and disposition. Until these sites have been evaluated in more detail, property owners, developers, and other interested parties should be aware of possible land development constraints posed by these resources."

Further evaluation of the wetlands will occur as part of the development process to determine whether the wetlands are significant and thus warrant the application of the Stream Corridor and Wetland Overlay District.

Chapter 3

Land Use Element.

Industrial Land Uses

The Comprehensive Plan contains policies on Industrial Land uses. The following policy relates to the proposed development:

It is a policy of this plan to encourage existing industry to expand onto adjoining lands. Where land use constraints exist due to the proximity to residential areas, siting standards shall be employed to permit the continued peaceful occupancy of adjacent dwellings.

The proposed amendment is consistent with this policy. The applicant is requesting an expansion of the urban growth boundary to allow for expansion of an existing industry, County Coach RV manufacturing. The request is to allow the expansion onto adjoining lands of the existing manufacturing site. There is no residential development adjoining the proposed expansion area; therefore this portion of the policy does not directly apply. Nevertheless, potential impacts on

nearby residential areas to the north of the expansion site (north of 1st Avenue (River Road)) will be mitigated through the approval condition that requires that no significant manufacturing operations shall occur within the northerly 80 feet of the expansion site.

Country Coach's business expansion needs require it to enlarge its manufacturing facility. Expansion onto the adjacent subject property is the most efficient, cost-effective and reasonable option for Country Coach to meet its needs. The continuation and expansion of Country Coach as a Junction City industrial business and employer fulfills Comprehensive Plan goals and policies regarding economic development in the city.

Industrial Land Use Growth and Future Needs: Public Utility Extension Policies

It shall be the policy of this plan to encourage industry needing rail access to locate adjacent to existing rail lines and rail spurs. Industry not needing rail access will be required to provide the necessary rights-of-ways to other parcels or industries located on adjoining lots.

The proposed amendment supports this policy. The proposed land use does not need rail access. While the proposed land use does not need to provide rights-of-ways to other parcels or industries located on adjoining lots, an adequate interior street system circulation is needed for the site. Additional findings are discussed in the Transportation Element, below.

Methodology Used For Determining Industrial Land Needs

It is the policy of this plan to provide sufficient land designated for future industrial development. An adequate supply of such lands is based upon twice the actual area determined to be needed for future industrial development.

The proposed amendment is consistent with the policy for the reasons stated in the sections addressing Goal 2, Goal 9 and Goal 14. The applicant submitted a copy of the plan amendment for Oaklea described in Ordinance No. 1094 (attached as Exhibit P to the Application) largely supplants the provisions of Chapter 3. III.C of the city's Comprehensive Plan with respect to the methodology for providing for an appropriate industrial lands base.

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 industrial land inventory analysis contained in the city's 1994 acknowledged Comprehensive Plan was revisited and revised in 2001 in connection with the city's approval of Ordinance No. 1094 (the Oaklea Ordinance) on June 27, 2001. The text amendments and revised inventory analysis were based on population and employment estimates that were Country Coach Comprehensive Plan Amendment and Rezoning (CPA-05-1 and RZ-05-2)

generated by the Lane Council of Governments (LCOG) and incorporated into the Comprehensive Plan when the city approved its 1996 Transportation System Plan.

The revised buildable lands inventory analysis reached the following conclusions with respect to the supply of and need for industrial land:

1. That the buildable industrial land supply within the Urban Growth Boundary is 439 acres;
2. That the supply of industrial land needed through the year 2020 is 67.9 acres; and
3. That (prior to approval of the Oaklea Ordinance) there is a 371-acre surplus of buildable industrial land.

Growth Rate Goals and Policies

A goal of this plan to provide an adequate amount of buildable lands to sustain growth in all sections of the community.

The proposed amendment is consistent with this goal. See findings above.

Chapter 4.

Junction City's Economy and Employment Sectors

Local Economy

It becomes a goal of this plan to diversify and improve the local economy by encouraging continued expansion of the manufacturing sectors producing machinery, furniture, prefabricated housing, recycled metals, fabricated wood components, erosion control materials, and metal fabricated products.

The proposed amendment strongly supports this policy. The applicant, Country Coach is proposing to expand its operations, thereby supporting the local economy in the manufacturing industry and associated supporting businesses in the area.

Chapter 5

Energy Conservation Element

Conservation Measures

It is a goal of this plan to conserve energy within the community in order to accommodate future needs using existing energy sources.

The proposed amendment supports this comprehensive plan goal. Major public facilities and services are already serving the Country Coach factory campus which reduces the energy-related inefficiencies associated with extending such services beyond an established urban area. The subject property is situated adjacent to the existing Country Coach campus and the established urbanized area where any subsequent development will promote the efficient energy-related use of existing and planned transportation facilities.

Transportation Element.

The City's Comprehensive Plan includes its March 2000 Transportation System Plan which was adopted to address LCDC's Transportation Planning Rule. The findings in support of Goal 12 show that with appropriate mitigation, the proposed amendments do not significantly affect any transportation policies described in the Transportation System Plan.

Public Facilities Element.

The Comprehensive Plan states:

"It is a goal of this plan to provide public facilities in an efficient and timely manner at levels in excess of projected demands."

Within the Junction City urban area, public facilities and services are provided by the city of Junction 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. The subject property is adjacent to Country Coach's current campus. Service connections from existing systems serving the site will be more efficiently made to property adjacent to the existing campus than to property at a satellite location. 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. Country Coach's use of public facilities and services on the subject property will not adversely impact the city's ability to meet existing or future urban needs. The proposed amendments are therefore consistent with the Comprehensive Plan's goals and policies pertaining to public facilities.

Public facilities and services are immediately available to the site and can be provided in an efficient and timely manner.

Appendix: Goal 14 Urbanization, Analysis

Growth Policy

Junction City's growth policy continues past trends while enhancing the area's livability and protecting its valuable resources. The Plan contains several statements that reflect the growth policy:

It is the goal of this plan to provide an adequate amount of Buildable lands to sustain growth in all sectors of the community.

It is the goal of this text to ensure that the economy of Lane County and the State benefit from land use decision promoting industrial growth within the Junction City area. It becomes a goal of this plan to diversify and improve the local economy by encouraging continued expansion of the manufacturing sectors.

It is a further goal of this plan to diversify and improve the local economy by encouraging the siting of new industries.

The proposed amendment supports these growth policies. The findings under the Statewide Planning Goal 14 address urbanization and appropriate location and timing of urban growth for Junction City. In addition, while the proposed amendment is not for a new industry or a diversification of an industry, allowing expansion opportunities for existing industrial businesses allow for diversification of the business, should they decide to do so. The manufacturing sector in Lane County has a strong employment base, which supports a number of community services through business taxes, development of supporting services, retail and housing. The proposed expansion of Country Coach in the short term, and also planning and providing area for future expansion will ensure that the State, Lane County and the City will allow for the improvement of the local, regional and state economy.