

said made them less justified in requesting a zone change for 74 acres of prime agricultural land when the essential question of how best to use the land had not been asked. She said the applicant was projecting a 50 percent build out over five years and had never explained what would happen to the remaining land. She said the applicant would have served the county better to make a proposal to better use its 17 acre expansion and ask for less land on its current application. She said she would not support the motion since the applicant had not met the requirements of Goal 3 and Goal 12.

Mr. Dignam said he supported the motion. He said the applicant had met the four criteria in goal 2 and stressed that this was what the commission should be focused on. He said Junction City had a surplus of industrial land but noted that the applicant needed *adjacent* land to expand. He stressed that Goal 9 related to economic development allowed an expansion of an urban growth boundary. He added that parking, congestion, and traffic issues had been addresses sufficiently to meet county staff concerns.

Regarding impacts to nearby farmers, Mr. Dignam said there had been testimony from the largest farm owner in the in the immediate area that he had no concerns over the zone change to industrial land. He said the last reason for him to support the motion was that the land was already within the city limits. He said it was unusual and absurd that land within the city limits should not be within the urban growth boundary. He said the urban growth boundary should at least be expanded to the same line as the city boundary.

Regarding the issue of pollution, Mr. Dignam said, other than denying the application, it most appropriate to approve the application with a strong warning about getting further information on pollutants.

Mr. Siekiel-Zdzienicki said he would not support the motion. He reiterated that the company had received an urban growth boundary expansion in 1999 and had not done anything with the land. He said the facility was trying to expand on "future thinking." He raised concern that the commission would set a bad precedent to turn farmland into industrial land. He acknowledged that it was absurd for city land to be outside of the urban growth boundary.

Mr. Sullivan reiterated that he still preferred trying to get the Board of Commissioners to focus on one major issue.

Mr. Becker said the applicant had the burden to provide the information necessary to make a recommendation. He said the applicant had not provided the necessary information on air emissions for approval.

Mr. Carmichael said he agreed that it was undesirable to change farmland into industrial land but stressed that the residents of the city wanted the change to happen. He reiterated that the land in question was within the city limits. He added that Country Coach was a good steward of the community and attempting to do everything right. He stressed that Community would continue to grow in any event. He said he was satisfied that Country Coach had done everything necessary to prove that the expansion was controlled and necessary. He said he would support the motion.

Mr. Dignam said it was the mission of he commission to look at all planning goals and guidelines and stressed that goal 9 (economic development) should be emphasized that over other goals. He stressed that Country Coach was one of the major employers in the County. He said the application was an opportunity for the County to support that employer.

Mr. Sullivan urged that the commission not deny an application that would have a \$40 million impact to the County.

Mr. Dignam said the Board of Commissioners would read the minutes and be aware of the concerns of the planning commission.

Ms. Kirkham clarified that she supported Country Coach as an employer but her vote was based on what she understood to be the criteria and would not support the motion.

**The motion failed 5:3 with Commissioners Dignam, Carmichael and Sullivan voting in favor.**

The work session adjourned at 8:40 pm.  
(Recorded by Joe Sams)

# MINUTES

Lane County Planning Commission  
BCC Conference Room - Lane County Courthouse

October 4, 2005  
5:30 p.m.

Present: Steve Dignam, Chair; James Carmichael, Vice Chair; Lisa Arkin, Juanita Kirkham, Nancy Nichols, John Sullivan, Jozef Zdzienicki, Ed Becker, Members; Planning Director Kent Howe, Bill Sage, Steve Hopkins, Stephanie Schulz, Staff

## Work Session -- 5:30 PM

### 1. Approval of May 17, April 19, September 6, 2005 minutes

Mr. Zdzienicki, seconded by Ms. Kirkham, moved to approve the minutes of April 19, May 17, and September 6, 2005. The motion passed unanimously.

### II. Ordinance/ In the Matter of Amending Chapter 16 of Lane Code to Implement the Wildland – Urban Interface Protection Standards (LC 16.266)

Land Management Division Staff Bill Sage provided background on Wildland-Urban Interface protection standards in Lane County. Going back to action taken in 1984, he said the Board of Commissioners created the F1 and F2 zones and zoning regulations LC 16.210 and 16.211. At the time the zoning regulations required a primary fire break of 50 feet around new dwellings in the forest zones. In 1994, he said new guidelines from the Oregon Department of Forestry regarding fire breaks and road standards had been released. He said the new fuel break guidelines included two fuel breaks, a primary of 30 feet and a secondary of 100 feet in radius around the new forest dwellings. The guidelines also included driveway and road construction standards which were adopted into Lane Code 16.210 and 16.211 and were currently in effect. He said the fuel break and road standards currently do not apply in any developed and committed exception areas and rural unincorporated communities in the County.

Mr. Sage noted that there had been numerous major fires in the 1990's in the western states and noted that the Oregon Legislative Assembly had established protection standards for structures and forest land in 1997 with the enactment of Oregon Forestland –Urban Interface Fire Protection Act of 1997, more commonly referred to as Senate Bill 360. He said that SB360 provided for site inspections and distribution of educational materials by the Oregon Department of Forestry (ODF) and enforcement of the implementation of fuel breaks around structures. SB360 was currently being implemented by ODF in Deschutes and Jackson Counties. He said the program had moved in to Josephine County and Douglas County in 2005 and it is anticipated that it would move into Lane County in 2006.

Mr. Sage said that in October 2004 the Board of Commissioners had asked staff to write a grant for planning and protection of private and public lands from wildfires. He said \$100,000 had

been awarded and a team made up of Land Management Division and Sheriff's staff, representatives of the rural fire protection districts, the Fire Defense Board, the Oregon Department of Forestry, and the Fire Marshall had formed a steering committee to examine how to draft a Community Wildfire Protection Plan. He said the Oregon Natural Hazard Workgroup at the University of Oregon had worked on CWPP that had been drafted with the input from stakeholder interviews, Firewise work shop, state and federal management professionals.

He said the Board of Commissioners had approved a resolution adopting the CWPP in July 2005 and the CWPP included 21 action items for further assessment of risks, education programs and implementation of protection standards in Lane County.

Mr. Sage said in August 2005, LMD staff had asked for a grant from the Title III Legislative Committee to implement the CWPP and had received a grant for \$121,000.

Mr. Sage said International Urban-Wildland Interface Code, Oregon Specialty Codes and land use codes were being examined as well as fire safety codes implemented in other cities and counties in Oregon to identify standards that would be reviewed by Lane County. He stressed that the Lane County plan would be innovative, not expensive to land owners, and was intended to save lives, resources, and money.

Mr. Sage called attention to the draft code dated October 5 distributed at the work session, which had revisions received from one or more of the RFPD since mailing of the September 23rd draft. He said he would email electronic copies of the current (Oct. 5<sup>th</sup>) draft to commission members and noted that all the RFPD revisions would be in red text on the electronic version.

Mr. Sage stated there were 13 zones listed in Lane Code 16.266 that were proposed for implementation of the fire safety standards. He said all the identified zones had some kind of allowable residential or inhabitable use. He called attention to an attached spreadsheet defining the implementing processes. He said a three-year survey of issued building permits had been completed. Based on the analysis, he outlined the types of development in rural Lane County which would require fuel break inspections and noted that some of the properties would also require driveway or road standards to be applied. He said road standards would not apply to existing structures which were being altered or added to or to older structures in the F2 zone which were being replaced in the same location. He said the primary fuel break, or "defensible space" would range from 30 feet to 75 feet around a building depending upon the CWPP risk assessment data.

In response to a question from Mr. Sullivan regarding why the number of permits had substantially dropped, Mr. Sage said agricultural buildings, minor accessory structures, mechanical and minor improvement permits were being exempted from the code requirements. He said the regulations could not be implemented unless a "new" building permit were applied for but noted that the County was looking at ways to offer incentives to meet the fire safety requirements of the proposed code. He reiterated that the new fire standards could not be applied retroactively to any existing structure unless there were substantial additions or modifications such as re-roofing.

In response to a question from Mr. Becker regarding how SB 360 would be implemented in 2006, Mr. Sage said the Oregon Department of Forestry (ODF) had been preparing for implementation in Douglas and Josephine County. He said it could take ODF 3-4 years time to implement the program in sub areas of those counties.

In Lane County, he stated this Spring there would be an education campaign including mailing fire safety publications to 33,000 home owners in an effort to explain fuel breaks and other fire defense practices.

In response to a question from Mr. Dignam regarding whether the State would eventually come and force its own implementation measures, Mr. Sage said the ODF would, as funding allowed, implement its own measures. He said the County program was an effort to address the fuels reduction issue at the time of initial construction under the County's authority to approved construction permits.

In response to a question from Mr. Dignam regarding at what point the public would be able to provide comment/input that could be incorporated into the document, Mr. Sage said the first Planning Commission public hearing would be on December 6. He said there would be notice mailings and legal ads published 20 days before the hearing date. He expressed a hope for a planning commission recommendation in January to forward the matter on to the Board of Commissioners. He said the board would then have a chance for its own public hearings and provide direction to staff.

In response to a question from Ms. Arkin regarding how older developments could be "caught up," Mr. Sage said new/replacement projects would come under the new code requirements. He said, over time, the standards would be implemented throughout the County as new construction appears. He stressed that people would be encouraged to comply with the standards on a voluntary basis. He reiterated that the County did not have the authority to enforce fire safety codes retroactively.

In response to a question from Mr. Zdzenicki regarding how Finance and Audit issues were part of the land use process, Mr. Sage said any time a proposal was made under any regulations involving a fee being assessed, an order to implement the fee had to accompany the ordinance implementing the regulations. He said staff had to go to the Finance and Audit Committee to get a recommendation on the feasibility of the fee structure, who would forward a recommendation to the Board of County Commissioners much as the Planning Commission was required to do.

Mr. Sage said building inspectors would be traveling to properties a minimum of three to five times and said that the first inspection the inspector made for approving site excavation and foundation forms would also be the time to look at the proposed driveway or road route, incline, adequate turnouts for fire vehicles, road surface, and defensible space around a proposed structure. He said no vertical construction could take place until that initial inspection took place. He said inspections of the site would be combined with other inspections as much as possible to keep fees low. He cited a figure of approximately \$138 to \$150 per building permit. He said the money collected from fees would go to the building department to hire a full-time land management technician.

In response to a question from Ms. Nichols regarding driveway widths (12 feet) for single houses and multiple residences (16 feet), Mr. Sage said that was required in current forest land codes. He said the required road width would not go below that minimum standard because of the need to provide for fire protection vehicle access. He said citizens exit from an area under threat was a huge issue which could occur at the same time as emergency vehicles traveling into the area. He said there was a process for road width requirements in the code now and stressed that the road standards would be strictly enforced.

In response to a question from Mr. Zdzienicki regarding different fuel break setback requirements for different types of development, Mr. Sage said different setbacks were possible. He said staff could/would learn more during the public involvement process. He noted that the defensible space requirements were based on the threat under the risk assessment program. He noted that Mr. Zdzienicki could make a recommendation to take into account the kinds of materials stored in a building.

Mr. Carmichael expressed his pleasure with combining inspections to keep permit costs down.

Mr. Carmichael noted that home owners were currently asked to sign a document promising to maintain fuel breaks and commented that this was not in the new draft plan. Mr. Sage said it was mentioned in the October 5 draft. He noted that the requirement was transferable to new property owners.

In response to a question from Mr. Carmichael regarding whether the insurance companies had been involved so people could get lower cost rates for compliance with new fire protection standards. Mr. Sage said he did not know whether the insurance companies would actively get involved but noted that the industry was involved in the State of Colorado. He raised concern that involving insurance companies would force compliance. He expressed a preference to work through education to have property owners do the work on their own. He said using a stick to enforce regulations could cause the loss of voluntary actions to comply with the new standards.

In response to a question from Ms. Arkin regarding training for inspectors in the new standards being applied, Mr. Sage said training would begin the following Friday morning with the first meeting with building inspectors..

Ms. Arkin commented that the requirements in the code would be a burden on low and middle income families. She said it would be impossible for some citizens to comply with the proposed regulations because of financial difficulty.

In response to a question from Mr. Dignam regarding any grandfather clauses in the code for existing properties, Mr. Sage reiterated that there would be no retroactive requirements for existing structures to comply with the new code.

In response to a question from Mr. Sullivan regarding whether the inspections would all be done for a permit for work on an existing house, Mr. Sage said the inspections would be task specific

and the new fire code requirements may not apply unless the work on a dwelling went above a certain percentage of the dwelling.

In response to a question from Ms. Kirkham regarding whether Oregon Department of Forestry would force compliance through inspections, Mr. Sage said ODF would have their own regulations for implementation of SB 360 but commented that they would likely not force compliance without consideration of multiple factors. He said ODF would work to inform and will want people on their side and would stress the benefits of voluntary compliance rather than forcing people to comply.

Mr. Sullivan said there were a number of things in the code that he would not do until final building approval was granted. He cited use of sawdust and planting trees as examples of things done within the defensible space area that would be done after the permit was granted. He said much of the standards could not be inspected unless people were sent out a year later to ensure that code requirements had been met.

Mr. Sage said this was where the public education came into play. He said staff were hoping that people would implement code requirements on their own because of the benefits involved.

In response to a question from Mr. Becker regarding the standards for onsite water and whether some of those standards had been factored into the code, Mr. Sage said those standards came out of the F2 code. He said the water requirements were there for little onsite emergencies on occasions when people could have a chance to put a small fire out before it spread.

Mr. Dignam said the two key issues were grandfathering of existing structures, and the cost to citizens and to the County for implementation of the new requirements. He added that there were potentially very high costs for implementation. He said there was a need to put more thought into those issues before the public hearing.

Ms. Nichols suggested removing ivy from the list of approved ground covers since it was on the list of noxious weeds.

**III. Continued Deliberations: PA 05-5132/ In the Matter of Amending the Lane County Rural Comprehensive Plan and the Junction City Comprehensive Plan to Expand the City's Urban Growth Boundary to Include 74.26 Acres of City Land to Facilitate Expansion of Country Coach**

Mr. Dignam noted that staff had indicated that there were concerns from legal counsel regarding the language of the motion taken during the last meeting. He asked staff to explain the legal concerns and make a suggestion as to how the issue could be addressed.

No *ex parte* contacts or conflicts of interest were declared.

Planning staff member Stephanie Schulz read the motion being referred to;

Mr. Carmichael, seconded by Mr. Sullivan, moved to approve the application in the matter of amending the Lane County Rural Comprehensive Plan and the Junction City Comprehensive Plan to expand the urban growth boundary to include 74.26 acres of City land to facilitate expansion of Country Coach Inc. As well as adding the following conditions:

1. Adopt conditions as adopted by the Junction City Council and Planning Commission.
2. Fully address air pollution issues regarding emissions from the facility using BACT practices.
3. Address traffic mitigation plans more completely, and
4. Address Storm water runoff issues from the site

Ms. Schulz said the motion had failed 5:3 but stressed that the motion did not specifically recommend passage or denial of the application to the Board of County Commissioners. She said a more specific action statement recommendation needed to be forwarded to the Board. In response to a clarifying statement by Mr. Dignam that the commission motion was unclear or inadequate, Ms. Schulz confirmed that the motion was unclear in its intent.

Planning Director Kent Howe said the main issue was that the motion had not passed and therefore no specific recommendation had been made.

Mr. Dignam noted that, in the past, there had been motions that had failed and there had been no problems.

Mr. Howe said usually there was another motion made that had the support of the planning commission that would act as a recommendation to the Board of Commissioners. He said the motion should be crafted in such a way that it had the support of the planning commission.

Mr. Sullivan commented that the commission had been discussing the urban growth boundary change and yet all of the points in the motion were items that were in Lane County's Goal six requirements. He said the Comprehensive Plan called for the commission to promote and cooperate but not dictate. He said the motion that was presented was not based on the question of expanding the urban growth boundary but rather tried to redefine areas that the city of Junction City was in charge of managing. He suggested that before a new motion was made the commission should get feedback from staff regarding whether the commission had reached beyond its purview.

Mr. Dignam said the responsibility of the planning commission was to try to interpret and implement Oregon Land Use Planning Goals and Statutes. He said the commission was supposed to look at the facts of the case and implement goals and statutes as they related to individual cases.

Mr. Howe said there were general requirements in Lane Code that had to be adhered to. He said the first requirement was to establish a need for the UGB expansion. He said there were 7 factors in Goal 14 that also needed to be addressed. He said there was a linear path of decision making that would lend support of an urban growth expansion.

Mr. Sullivan commented that this allowed a rather arbitrary interpretation of standards and issues. He raised concern that the commission was beginning to make decisions that did not take city of Junction City rules and regulations into consideration. He questioned whether that should be included in a motion to the Board of County Commissioners.

Mr. Dignam noted that the UGB expansion required approval of Junction City requirements as well as those used by Lane County.

Ms. Kirkham said the task of the commission was to determine whether Country Coach had met the criteria to justify an extension of the urban growth boundary of Junction City as well as re-designating 74 acres of farm land into industrial zoning.

Mr. Zdzienicki commented that some commissioners had felt that Country Coach had not met the criteria of Goal 14 and Goal 9. He said they had not shown sufficient need for re-designating 74 acres of farm land into industrial land.

Mr. Dignam called for a motion to be put on the table for deliberations.

Mr. Sullivan, seconded by Mr. Dignam, moved that the planning commission recommend approval of PA 05-5132 in the Matter of Amending the Lane County Rural Comprehensive Plan to Expand the City's Urban Growth Boundary to Include 74.26 Acres of City Land to Facilitate Expansion of Country Coach and further stipulate and recommend that Lane County planning staff be directed by the Board of Commissioners to further address the issues of water and air quality.

Mr. Dignam raised concern that the motion was not significantly different from the original motion.

Mr. Sullivan noted that if the motion were not passed then the planning commission could then make a motion of denial.

Mr. Sullivan said he wanted to send a clear signal to the Board of County Commissioners by using the words "Stipulate" and "recommend." He noted that all of the concerns of the planning commission were now in the record and could be reviewed by the Board of Commissioners. He added that the commission had a responsibility to address the possible influx or loss of \$1 billion of revenues into Lane County over the next ten years. He said the motion would put the matter into the hands of the elected officials.

Mr. Dignam called for staff comment on the motion.



Mr. Howe said the motion was an advisory to the Board of Commissioners who could take the recommendation and make a final decision.

Mr. Carmichael said the matter would go before the Board of County Commissioners regardless of what happen at the planning commission level. He said there would be further public hearings on the issue and encouraged the commission to pass the motion to move forward with the process in a manner that made sense.

Mr. Zdzenicki reiterated that Country Coach had not proved to him that there was a need for the expansion of their land. He added that it might be 20 years before any development occurred.

Ms. Arkin said the original application was to expand the UGB and to re-designate 74 acres to industrial land. She said she felt strongly that approval of the motion would send a message of approval of re-designating agricultural land to industrial. She said there was no way to take a narrow view of the matter.

Mr. Becker said he did not think the application was adequate or complete in that it made no mention of increased air pollutants generated by the facility. He said a 38 percent increase of volatile organic compounds released into the air was not mentioned in the application. He said he did know how an application could be approved given the lack of crucial data. He said he would not support the motion.

Mr. Carmichael said he respected the commissioner's comments but stressed that none of the commissioners were going to change their positions. He reiterated that the positions of each of the commissioners were a matter of record which could be reviewed by the Board of Commissioners. He called for the question on the motion on the table.

Mr. Dignam stressed that he had not seen a project as important to economic development as the application in question. He said the commission should place a great deal of weight on Goal 9 which said; "*... to provide adequate opportunity throughout the State for a variety of economic activities vital to the health, welfare, and prosperity of Oregon's Citizens.*" He said one of the key points of the Goal was to strongly emphasize the extension of and increased productivity from existing industries and firms. He said the State of Oregon has indicated that the Motor Coach industry is one its most important targets in the region for industrial expansion. He stressed that this was not outside companies trying to come into the area, but an existing business that was looking to expand. He said Goal 9 urged support of expanding existing businesses. He said Goal 6 was relevant but stressed that there was no evidence that the expansion would violate, or threaten to violate, any state or federal pollution regulations. He said concerns regarding Goal 6 were overblown.

Regarding Goal 14 involving the orderly and efficient transition from rural to urban land use, Mr. Dignam said one of the important issues to examine was employment opportunities.

Mr. Dignam said if exceptions were needed then the commission was to refer to Goal 2 exceptions which called for establishing a land use planning process and policy framework as a

basis for all decisions and actions related to use of land and ensure an adequate and factual base for decisions and actions. He stressed that the commission was to make decisions based on facts.

Regarding Goal 14 standards that needed to be met, Mr. Dignam noted that Country Coach needed land adjacent to their existing facility or the expansion would not work. He added that the applicant had met Goal 14 goals. He stressed that Country Coach had heard testimony raising concern over transportation issues and had worked on extensive redesign of transportation plans to address those concerns.

Regarding nearby farmland, Mr. Dignam stressed that there had been public comment from the largest farmer in the area that he actually preferred his farm be next to the facility as opposed to being next to residential areas.

Regarding making decisions based on a factual basis, Mr. Dignam said it was hard for him to anything but to support the motion on the table. He stressed the importance of basing decisions on a factual basis.

The motion failed 5:3 with Mr. Dignam, Mr. Sullivan and Mr. Carmichael voting in favor.

Mr. Howe suggested that the board make a motion that the majority of the commission supported.

Mr. Becker, seconded by Ms. Arkin, moved to deny the application PA05-5132 In the Matter of Amending the Lane County Rural Comprehensive Plan and the Junction City Comprehensive Plan to Expand the City's Urban Growth Boundary to Include 74.26 Acres of City Land to Facilitate Expansion of Country Coach

Mr. Sullivan said the commission had a responsibility to make a motion but stressed that there was also a need to be clearer about the reasoning of the motion made. He said untold hours of work and money had been spent on the application and encouraged the commission to be specific about its reasons for denial.

Mr. Dignam said the rationale had already been entered in the record through the deliberations of the commission. .

The motion passed 5:3 with Mr. Dignam, Mr. Sullivan, and Mr. Carmichael voting in opposition.

Ms. Arkin suggested scheduling one or two work sessions to discuss the Planning Commission annual report.

Kent Howe said, in the past, the report had been drafted by staff and was presented to the commission for approval. He noted that the previous year's report had been e-mailed to the

commission members for review. He said he would schedule work sessions at the pleasure of the commission.

The meeting adjourned at 8 pm.  
(Recorded by Joe Sams)

**ORIGINAL**

**APPLICATION**

**to**

**LANE COUNTY FOR CO-ADOPTION OF AN  
AMENDMENT TO JUNCTION CITY'S URBAN GROWTH BOUNDARY**

**COUNTRY COACH, INC.  
135 East 1st Avenue  
Junction City, Oregon**

**February 2, 2005**

**HERSHNER HUNTER, LLP  
ATTORNEYS  
P.O. BOX 1475  
EUGENE, OREGON 97440  
FAX (541) 344-2025  
TELEPHONE (541) 686-8511**

**APPLICATION TO LANE COUNTY FOR CO-ADOPTION OF AN  
AMENDMENT TO JUNCTION CITY'S URBAN GROWTH BOUNDARY**

**Applicant:** Country Coach, Inc.

**Property Owner:** Reerslev Properties, LLC

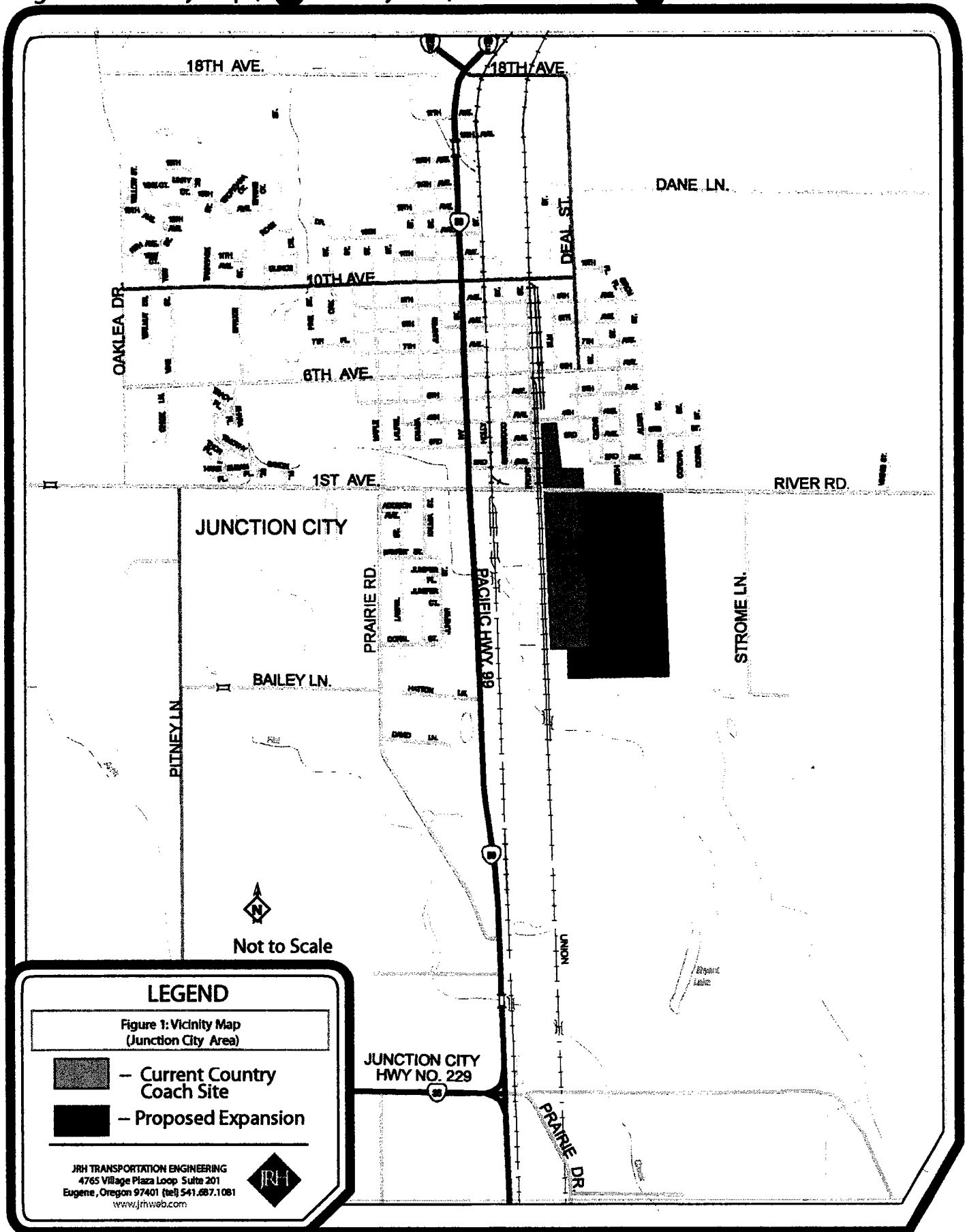
**Property Location:** 74.26 acres adjacent to the existing Country Coach factory campus, located east of the Southern Pacific railway and south of West 1st Avenue, Junction City, Oregon. The property is within the city limits of Junction City but outside of the existing Urban Growth Boundary. A site location map that shows the existing Country Coach factory campus and the proposed expansion site that is the subject of this application is on the following page.

**Assessors Map and Lot:** Map 16-04-05-00, Tax Lot 100. A copy of the Assessor's Map is included as Appendix G to the accompanying application filed with Junction City, Oregon; and the legal description of the subject property is attached as Appendix H to that accompanying application.

**Current City Zoning:** Agriculture (AG)

**Attorney-Consultant:** Paul Vaughan  
Hershner Hunter, LLP  
180 East 11th Avenue, Eugene, OR 97401  
P.O. Box 1475, Eugene, OR 97440  
Telephone: (541) 686-8511

Figure 1: Vicinity Map (Junction City Area)



## **1. INTRODUCTION.**

### **1.1 General Site Description.**

The property subject to this application contains 74.26 acres and is adjacent to portions of the easterly and southerly boundaries of the existing Country Coach 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 comprises Tax Lot 100, Lane County Assessor's Map No. 16-04-05. A copy of that assessor's map showing the location of the property is included in Appendix G.<sup>1</sup> Appendix C contains copies of the city's Comprehensive Plan Map and Zoning Ordinance Map on which the subject property has been marked. The entire property is located inside the city limits of Junction City. However, it is currently outside of the city's Urban Growth Boundary.

The property is currently zoned for agricultural use. Adjacent property to the west is zoned Light Industrial (M1). Adjacent property to the east and south is zoned Agricultural (AG). The northerly boundary of the property abuts East 1<sup>st</sup> Street (River Road). Abutting property to the north of East 1<sup>st</sup> Street is zoned for Light Industrial (M-1), Multi-Structural Residential (R-4) and Duplex Family Residential (R-2) uses.

Both the subject property and the existing Country Coach campus are inside the corporate limits of Junction City. The current factory campus receives the full range of urban services provided by the city and those services can efficiently and economically be extended to the abutting expansion area. The urban services 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.

### **1.2 Description of Proposed Amendments.**

The application before Junction City is for approval of the following:

1. An amendment to the city's Comprehensive Plan and Comprehensive Plan Map (i) expanding the city's Urban Growth Boundary to include within the boundary the 74.26-acre parcel that abuts the existing Country Coach campus and (ii) designating the land within the expansion area for light industrial use; and

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<sup>1</sup> References to appendices in this document refer to the appendices to the accompanying application filed with Junction City, Oregon.

2. An amendment to the city's Zoning Ordinance Map changing the zoning of the subject property from Agriculture (AG) to Light Industrial (M1).

The application before Lane County is for approval of an amendment to the Rural Comprehensive Plan Map co-adopting the expansion of Junction City's Urban Growth Boundary to include within the boundary the subject 74 acres that abut the existing Country Coach factory campus.

## **2.0 LANE COUNTY RURAL COMPREHENSIVE PLAN MAP AND URBAN GROWTH BOUNDARY AMENDMENT CRITERIA.**

The following criteria apply to amendments to the Lane County Rural Comprehensive Plan Map:

- 1. The Comprehensive Plan Map and Urban Growth Boundary amendment must be consistent with applicable Statewide Planning Goals; and*
- 2. The Comprehensive Plan Map and Urban Growth Boundary amendment must be consistent with Lane Code Section 12.050.*

Those criteria are addressed below.

### **2.1 The Comprehensive Plan Map and Urban Growth Boundary Amendment Is Consistent With Applicable Statewide Planning Goals.**

Accompanying this application to Lane County is a copy of the application (the "Junction City Application") filed with Junction City, Oregon and captioned "Country Coach, Inc.'s Application for Amendment of the Junction City Comprehensive Plan and Urban Growth Boundary and Zone Change from Agriculture (AG) to Light Industrial (M1)." The Junction City Application, which was filed with Junction City on February 1, 2005, contains an extensive discussion of applicable Statewide Planning Goals and implementing administrative rules. The application provides substantial evidence showing that the proposed amendments to the city's Comprehensive Plan and Urban Growth Boundary are consistent with all applicable Statewide Planning Goals. The application also demonstrates that amending the county's Rural Comprehensive Plan Map to co-adopt the Urban Growth Boundary amendment is consistent with the Statewide Planning Goals.



## **2.4 The Comprehensive Plan Map and Urban Growth Boundary Amendment Is 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.*

The four criteria described above are described in the disjunctive. Accordingly, a finding that any of the four criteria is satisfied is sufficient to find compliance with Lane Code 12.050(2).

### **2.4.1 An error in the comprehensive plan.**

This criterion is inapplicable. The amendment is not being proposed because of an existing error in the Rural Comprehensive Plan.

### **2.4.2 Changed circumstances affecting or pertaining to the plan.**

This criterion is satisfied and supports the proposed amendment to the city's Urban Growth Boundary. The changed circumstances affecting or pertaining to the plan are discussed in detail in the Junction City Application. In particular, the following sections and appendices of the Junction City Application address the changed circumstances and the demonstrated need for the subject land to be added to the city's Urban Growth Boundary and designated for Light Industrial Use:

- a. Section 1.0 (Introduction);
- b. Section 4.2 (addressing Goal 2—Land Use Planning);
- c. Section 4.9 (addressing Goal 9—Economy of the State);
- d. Section 4.14 (addressing Goal 14—Urbanization); and
- e. Section 7.0 (addressing ORS 197.298 regarding the priority of land to be included within an urban growth boundary); and
- f. Appendix D, Appendix E and Appendix R.

#### **2.4.3 A change in public policy.**

This alternative criterion is also satisfied in this case. The proposed Urban Growth Boundary expansion and zone change that will allow Country Coach to expand and to develop new product lines clearly implements the policy objectives and goals of the state as described in HB 2011 (Chapter 800, Oregon Laws 2003). That legislation, which was enacted by the 2003 Legislative Assembly (declaring an emergency), which was approved by the Governor on September 24, 2003, and which became effective on September 24, 2003, provides powerful “reasons” under Goal 2 and Goal 14 for approving the proposed Urban Growth Boundary amendment. The legislation is discussed in detail in Section 1.0 of the accompanying Junction City Application.

In summary, the Legislative Assembly found during its last legislative session that Oregon has the highest unemployment rate in the nation and that many counties are economically distressed, and it identified the retention of existing jobs and the creation of new jobs by existing businesses as necessary for economic prosperity. To that end, the Legislative Assembly mandated that the Oregon Economic and Community Development Commission develop a mission statement for the Economic and Community Development Department that gives the highest priority to promoting job development in Oregon by doing six things, the first and second of which are (i) assisting existing companies that desire to expand and (ii) assisting existing companies that desire to develop new products. Country Coach desires to expand its factory campus (i) to enable it to streamline its operations so it can remain competitive in the new millennium and (ii) to enable it to develop and manufacture new product lines. For the reasons discussed in detail in the Junction City Application, County Coach can only remain competitive in its traded sector (highline coach manufacturing) if its expansion is allowed at a location adjacent to its existing campus. If that expansion is not permitted, Country Coach will likely have no alternative but to close its existing facility and relocate to another city or state with a sufficiently large industrial site to accommodate its entire operation.

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

This alternative criterion is also satisfied in this case. The Junction City Application includes a reevaluation of the city's industrial land needs. The application demonstrates that the subject property is needed industrial land and that the city's Urban Growth Boundary should be amended to include that land within the boundary. The application also shows Statewide Planning Goals consistency.

**2.4.5. The amendment does not impair the purpose of the plan as established by Lane Code Section 12.005.**

Lane Code Section 12.005 provides that the Board of County Commissioners shall adopt a Comprehensive Plan and that:

*The general purpose of the comprehensive plan is the guiding of the social, economic, and physical development of the County to best promote the public health, safety, order, convenience, prosperity and general welfare.*


The Statewide Planning Goals promote the same purpose. As is demonstrated in the Junction City Application, the proposed Urban Growth Boundary expansion is consistent with all Statewide Planning Goals. Accordingly, this criterion is satisfied.

**3.0 CONCLUSION.**

Country Coach seeks to expand its manufacturing facility onto adjacent land, which requires an expansion of the Junction City Urban Growth Boundary. The accompanying Junction City Application to amend the Junction City Comprehensive Plan and Urban Growth Boundary and to rezone the subject property from Agriculture (AG) to Light Industrial (M1) demonstrates that all applicable criteria have been addressed and satisfied. Lane County should co-adopt with the city an amendment to the city's Urban Growth Boundary as proposed.

Respectively submitted,

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By:   
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