

Written Statement
Adoption of Rural Comprehensive Plan Amendment
Co-adoption of Junction City Comprehensive Plan Amendments and UGB Expansion

Introduction

In July of 2008 Junction City received a grant from DLCD for "customized periodic review." The customized periodic review project is a two-phased, multi-year program designed to address the land use and public facility impacts resulting from the siting of the State Hospital and Prison near the southern urban growth boundary (UGB) and identify the City's 20 year employment land needs. The program began in October 2008 and is scheduled for completion in September 2010.

- **Phase I** of the project resulted in an Economic Opportunity Analysis (EOA) and a preliminary Local Wetland Inventory. In Phase I, the City studied employment and public facility land needs and identified suitable sites – within and outside the existing UGB – to meet these needs. The EOA included background information and an economic development strategy that has been incorporated into Chapters 3 and 4 and Appendix C of the Junction City Comprehensive Plan.
- In **Phase II**, beginning in the fall of 2009, the City will prepare a Housing Needs Analysis, complete the Local Wetlands Inventory, and update its commercial and residential buildable lands inventory. This information will be used to determine residential and commercial land needs. Identified residential and commercial land needs will then be compared with the buildable lands inventory and appropriate land use efficiency measures to determine whether additional plan map amendments are necessary to provide a 20-year commercial and residential land supply.

As part of Phase I the Junction City Council adopted amendments to its Comprehensive Plan and UGB Boundary and is now submitting an application to Lane County requesting co-adoption of the amended Junction City Comprehensive Plan, as part of the Lane County Rural Comprehensive Plan. The amendments to the Junction City Comprehensive Plan include:

- UGB Expansion for siting of the State Correctional Facility, expansion of City sewer lagoon, and the proposed Grain Miller facility.
- Adoption of the EOA into the City's Comprehensive Plan
- Amendment of Chapters 3, Land Use Polices and Chapter 4, Economic Element of the Junction City Comprehensive Plan, to implement the EOA policies and economic development strategies; and
- Correction of historical UGB mapping discrepancies by aligning UGB boundary to be collinear with state and county road rights-of-way.

Following are findings addressing applicable criteria stated in Lane County Code. Lane County code sections are in **bold** text and findings addressing each section follow. Attached and incorporated into this report by reference is a staff report and findings with attachments that support amendments to the Junction City UGB.

LC 12.050 Method of Adoption and Amendment:

(1) The adoption of the Comprehensive Plan or an amendment to such Plan shall be by an ordinance.

Finding: Applicant notes that the Lane County Board of Commissioners must co-adopt these amendments to Junction City's Comprehensive Plan (and by extension amend the County's Rural Comprehensive Plan) by ordinance. Such action will satisfy this amendment criteria.

(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 on 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.

Introduction:

This amendment criteria is set in the alternative. Only one criteria need be satisfied to support a Rural Comprehensive Plan amendment. That said, Junction City's request is justified and supported by three of the above criteria, as set forth in the following findings.

Finding: LC 12.050(2)(b) is met as circumstances with Lane County and Junction City changed with the 2007 announcement by the State of the siting of two State facilities in or near Junction City. The State correctional facility and state mental hospital will ultimately employ 1,800 workers. Grain Millers is also proposing to construct a major industrial bulk processing facility that takes advantage of the region's agricultural economy and the availability of flat land with urban services, rail, and highway access. The State prison and Grain Millers are proposed to be located on property outside the City's current UGB. Amendment of the Junction City Comprehensive Plan and Map was required to accommodate needed land for these major employment opportunities and to provide the facilities with urban services. Without these amendments, arguably one and perhaps both major employers cannot locate in Lane County. The County Rural Comprehensive Plan must be amended to accommodate this change in circumstances caused by the State's announcement.

Finding: LC 12.050(2)(c) is met as voters in Oregon passed two measures (Measure 56 and 11) in 1994 that required mandatory sentencing guidelines and an increase in available prison space. In response to inmate population projections, the Department of Corrections developed a Long Range Construction Plan that provides for the expansion of three (3) existing facilities and the construction of five (5) new facilities located throughout Oregon. In the spring of 1996, the Oregon Dept. of Corrections (DOC) began a siting process defined by law (ORS 421.611) to

identify and select locations for additional correctional facilities. On January 29, 1997, the Governor issued Executive Order No. 97-11, to restart the siting process in Lane and Jackson Counties, with one facility to be located in each county. The order directed the DOC to “begin the corrections facilities siting process set out in ORS 421.616 by nominating sites for a men’s medium security complex, with a men’s minimum security component and its future expansion” in Lane and Jackson Counties. On June 9, 1997, Governor Kitzhaber announced his selection of the Milliron Road site located near Junction City. A construction plan delay postponed site preparations for a time, but in 2007 ODOC re-announced its plan to construct minimum and medium sized security facilities in Junction City.

A similar change in public policy was evidenced by the legislature funding the Oregon State Hospital Replacement Project in 2007. In so doing, the legislature expressed its support for construction of a new State Hospital chosen in Junction City.

The Junction City site was selected after DAS and DHS had conducted a thorough analysis of the State’s delivery of care and a site selection process. DHS and ODOC will co-locate on the 250 acre site owned by ODOC. The hospital will be located inside the UGB, while the area for the prison facility is outside the UGB. These changes in public policy, as expressed by both Oregon voters and the Oregon legislature, can only be effected by the proposed UGB expansion. This step is necessary to eventually annex the entire 250 acres in order to provide the urban level of services required to support the state facilities.

Lastly, while employment opportunities have always been a component of Lane County public policy, in light of the deepening recession, encouraging and supporting employment opportunities within local business, such as Grain Millers represents, has become even more of an essential element of City and County public policy. Given the increased relative importance of economic development, the change in public policy brought by the ongoing recession merits approval of the City’s request to include the Grain Millers site within its UGB.

Finding: LC 12.050(2)(d) is addressed as follows: The proposed UGB expansion for industrial and public lands is directly related to Junction City’s demonstrated need for employment opportunities consistent with Goal 14, Need Factor 2 addressed in detail in the attached document titled: “City of Junction City, Comprehensive Plan and UGB Amendment Findings, August 2009”, prepared by Winterbrook Planning.

As discussed further in the findings document referenced and attached, OAR 660-024-0060(5) states that cities may identify site requirements for needed employment and apply these requirements to address ORS 197.298 Priorities for urban growth boundary expansion:

In determining need, local government may specify characteristics, such as parcel size, topography or proximity, necessary for land to be suitable for an identified need and limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298.

Junction City has sufficient industrial land within its UGB to accommodate industrial uses that do not have special site requirements. However, the EOA (p. viii) goes on to note that Junction City lacks sites within the existing UGB that meet identified site requirements for three types of land uses:

Junction City will need to provide land for the following sites through a UGB expansion to accommodated growth over the 2009 to 2029 period:

- One approximately 235-acre site for the State Prison and Hospital. The State has identified the site for these State Facilities.
- One industrial site with at least 50 suitable acres to take advantage of a unique niche opportunity for rail-loop served bulk processors, such as Grain Millers. Other needed characteristics of this site are described in Chapter 5.
- One 40 acre site for a wastewater facility expansion that is necessary to provide sanitary sewer service for the Prison and Hospital. The City has identified the site for the wastewater facility expansion.

Finding: The attached EOA includes background information and economic development strategies that are incorporated into the Junction City Comprehensive Plan and is the technical document that justified the UGB expansion.

Finding: The EOA evaluated the City's short term and long term employment land needs as well as established economic development strategies.

Finding: The EOA includes an updated 20 year employment forecast and updated Commercial and Industrial Buildable Land Inventory and land needs analysis which has been incorporated into Junction City's Comprehensive Plan. Alone, the newly adopted EOA evidences a change in public need requiring co-adoption by the County of the City's Comprehensive Plan amendments.

Finding: On January 28, 2009 Lane County Board Order 09-01-28-20 identified the Lane County Bio Energy Park as a project in its United Front efforts and stated this project will benefit the citizens of the region. A Junction City owned site was chosen for the Bio-Energy Park and as part of the completion of the EOA, the city identified the Bio-Energy Park as a potential cluster industry in Junction City and adopted a policy to support the development of this industry an economic development strategy.

Finding: The Comprehensive Plan amendments are necessary to address identified changes in public needs which affect the County's Rural Comprehensive Plan. The amendments comply with applicable Statewide Planning Goals, OARs, and ORSs as illustrated in the attached document *City of Junction City, Comprehensive Plan and UGB Amendment Findings, August 2009*, prepared by Winterbrook Planning. The amendments, therefore, do not impair the purpose of the County's Rural Comprehensive Plan, as established by LC 12.005 and as further addressed below.

LC 12.005 Purpose.

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

Finding: The Lane County Comprehensive Plan includes the co-adoption of each city's Comprehensive Plan as illustrated in Chart One of the Lane County Rural Comprehensive Plan. Part I, Section D of the Plan states:

"While the Policies in this document are directed at Lane County government, it is clearly recognized that the County has a responsibility to, and must coordinate efforts closely with, the incorporated cities within its boundaries. Statewide planning law requires that each incorporated city develop and adopt its own land use plan which must itself comply with LCDC Goals. The plan must contain essentially the same elements as the County General Plan, with an additional element of an identified Urban Growth Boundary (required by Goal 14). Future urban growth for each city is to take place within that Boundary. In the case of the Eugene-Springfield Metropolitan Area Plan, a mutual Boundary is adopted by both cities and the County. For all other cities, the County must ratify the cities UGBs by independent evaluation of, and adoption of, appropriate city plan provisions.

Through this method, the County becomes responsible for administering the provisions of city plans within the city UGBs but outside of the corporate city limits. 'Joint Agreements for Planning Coordination' drawn up between the County and each city lay the framework for cooperative action in the effort."

Finding: Lane County and the City also signed an intergovernmental agreement which states the County will co-adopt with the City "establishment of and changes to UGB and Comprehensive Plan and Refinement plan adoption and amendments."

Finding: By co-adopting the Junction City Comprehensive Plan amendments, the County is guiding the social, economic and physical development of the county. Co-adopting Junction City's Comprehensive Plan amendments and UGB boundaries to meet identified commercial and industrial land needs will allow the City to promote economic development by adding approximately 1800 new jobs and maintaining 100 exsiting jobs into a recession economy. Physical development of these sites is guided by extending the City's UGB to encompass these development lands. Only in that way can the City plan for and provide the urban services required by these facilities. Delivery of these services and development of these sites, as proposed, promotes public health, safety, order, convenience, prosperity and the general welfare of the City and County. In assisting the State to effect its plan to site the proposed facilities, both Lane County and Junction City will benefit from increased jobs and improved infrastructure.

Finding: The Lane County Comprehensive Plan "follows the format of the LCDC Statewide Planning Goals, recognizing that they must be met by all local jurisdictions in Oregon." The proposed Amendments to the Junction City Comprehensive Plan comply with applicable

Oregon Statewide planning goals, OARS and ORSs as shown in the attached document, incorporated herein, entitled *City of Junction City, Comprehensive Plan and UGB Amendment Findings, August 2009*, prepared by Winterbrook Planning.

Exhibit B.1

CITY OF JUNCTION CITY
COMPREHENSIVE PLAN AND UGB AMENDMENT FINDINGS
(AUGUST 2009)

Justification and Findings Report

August 3, 2009



WINTERBROOK PLANNING
Community Resource Planning

CITY OF JUNCTION CITY

COMPREHENSIVE PLAN AMENDMENT AND URBAN GROWTH BOUNDARY (UGB) FINDINGS (AUGUST 2009)

Comprehensive Plan Text and Map (UGB) Amendments

This narrative supports the following amendments to the Junction City Comprehensive Plan:

1. Adopt the Junction City Economic Opportunities Analysis (EOA) and Economic Development Strategy (EDS) as Appendix ___ to the Junction City Comprehensive Plan.
2. Amend Chapters 3 (Land Use) and 4 (Economic Development) of the Junction City Comprehensive Plan to carry out the direction found in the EOA and EDS and to remove outdated and irrelevant material.
3. Amend Appendix C of the JC Comprehensive to remove text related to employment projections and land need and supply that has been replaced by the Junction City EOA.
4. Expand the Junction City Urban Growth Boundary (UGB) to meet three specific large-site land needs identified in the EOA for the following uses:
 - Rail-dependent industrial (Grain Millers);
 - Institutional (state prison and hospital), and
 - Wastewater treatment plant expansion.

and

5. Adopt plan policies incorporating conditions of approval as recommended by the Oregon Department of Transportation (ODOT) to ensure compliance with the Transportation Planning Rule (TPR) for the:
 - Rail-dependent industrial (Grain Millers) use; and
 - Institutional (state prison and hospital) use.

Applicant: The applicant is the **City of Junction City**. Contact Kay Bork, Planning Director at (541) 998-2153. ECONorthwest and Winterbrook Planning provided technical support for this application.

Maps

MAP 1: Existing Junction City Comprehensive Plan and UGB

MAP 2: Junction City UGB Expansion Study Area (showing exception areas and agricultural soil classifications)

MAP 3 & 4: Proposed Junction City Comprehensive Plan and UGB Map

Attachments

Attachment 1: Proposed Junction City EOA and Economic Development Strategies Summary

Attachment 2: Proposed Junction City Comprehensive Plan Amendments to Chapter 3 (Land Use) and 4 (Economic Development)

Attachment 3: Lane County Ordinance PA 1255 Amending the Lane County Rural Comprehensive Plan (RCP) and Adopting a Coordinated Population Forecast for Lane County and Each Urban Area within the County (June 17, 2009)

Attachment 4: Preliminary Local Wetland Inventory Report for the Area within the Junction City Urban Growth Boundary (Winterbrook Planning, June 2009)

Attachment 5: UGB Expansion Alternatives Analysis to Accommodate Large Rail Dependent Bulk Processing Use (Winterbrook Planning, June 23, 2009)

Attachment 6: Letter from Oregon Department of Transportation (June 11, 2009)

INTRODUCTION

Junction City's Economic Program

Junction City is a local economy in transition. In 2006, the City had 2,154 jobs in manufacturing—the majority in RV manufacturing. By April 2009, Junction City's RV manufacturing industry decreased to about 100 jobs as the industry collapsed in the wake of the global financial crisis.

While Junction City experienced substantial employment losses in 2008 and 2009, it has two major economic opportunities:

- (1) The State of Oregon is planning to construct a correctional facility and state mental hospital that will ultimately employ 1,800 workers; and
- (2) Grain Millers is proposing to construct a major industrial bulk processing facility that takes advantage of the region's agricultural economy and the availability of flat land with urban services, rail and highway access.

Consistent with Statewide Planning Goals 9 – Economy of the State and 14 – Urbanization, the City seeks to capitalize on these economic opportunities by expanding the UGB to provide suitable employment sites for these major employers. The City has coordinated its efforts with Lane County, the Governor's Economic Revitalization Team, the Oregon Department of Corrections, Grain Millers Corporation, the Oregon Department of Land Conservation and Development, the Oregon Department of Transportation, the Oregon Department of State Lands, and the Oregon Department of Community and Economic Development.

The economic development program for Junction City can be summarized as follows:

- Revitalize downtown by encouraging the development of a couplet on Highway 99 and adopting strategies to encourage redevelopment and infill on under-utilized sites;
- Take advantage of immediate economic opportunities (the state correctional facility and hospital and Grain Millers) by expanding the Urban Growth Boundary (UGB) to include the proposed sites of these major employers;
- Encourage development of a bio-energy park on City-owned land;
- Create a complete community that provides housing, retail, and services and is attractive to households that have workers at the state facilities and Grain Millers.

Chapter 3 of the Economic Opportunities Analysis (EOA) provides more detail on Junction City's comparative advantages, target industries and their site requirements. The Junction City Economic Development Strategy (EDS) articulates the City's economic development program in more detail. This program is incorporated into Chapter 3 (Economic Development) of the Junction City Comprehensive Plan.

Customized Periodic Review Program

Junction City is engaged in a two-phased, multi-year program designed to address the land use and public facility impacts resulting from the siting of the State Hospital and Prison near the southern urban growth boundary (UGB). The program began in October 2008 and is scheduled for completion in September 2010.

- **Phase I** of the project resulted in an Economic Opportunity Analysis (EOA) and a preliminary Local Wetland Inventory. In Phase I, the City studied employment and public facility land needs and identified suitable sites – within and outside the existing UGB – to meet these needs. The EOA included background information and an economic development strategy that has been incorporated into Chapters 2 and 3 and Appendix C of the Junction City Comprehensive Plan.

These findings support amendments to the Junction City UGB to meet the specific site requirements of institutional and rail-dependent employers as called for in the EOA and amended Junction City Comprehensive Plan. A UGB amendment is also necessary to accommodate planned growth called for in these plans.

- In **Phase II**, the City will prepare a Housing Needs Analysis, complete the Local Wetlands Inventory, and update its buildable lands inventory. This information will be used to determine the residential land needs. Identified residential and commercial land needs will then be compared with the buildable lands inventory and appropriate land use efficiency measures to determine whether additional plan map amendments are necessary to provide a 20-year commercial and residential land supply.

Goal 9 Requirements

The Junction City Economic Opportunities Analysis prepared by ECONorthwest meets the requirements of the Goal 9 administrative rule. The Junction City EOA:

- Considers local, regional, state and national economic trends;
- Articulates Junction City's comparative economic advantages;
- Identifies commercial, industrial and public employment opportunities and the site characteristics required for targeted industrial firms and public institutions;
- Documents opportunities and takes steps to increase land use efficiency within the UGB;
- Compares documented site needs with the availability of sites within the existing Junction City UGB; and
- Includes a detailed economic development strategy to meet locally defined economic objectives.

Goal 14 Requirements

Goal 14 requires cities and counties jointly to establish and maintain UGBs to:

- Provide for an orderly and efficient transition from rural to urban land use;

- Accommodate urban population and urban employment inside urban growth boundaries;
- Ensure efficient use of land; and
- Provide for livable communities.

OAR Chapter 660, Division 024 clarifies procedures and requirements of Goal 14 regarding local government adoption or amendment of a UGB.

Amendments to UGBs are based upon consideration of six factors:

Need Factors

1. ***Demonstrated need to accommodate long range urban population growth, consistent with a 20-year population forecast coordinated with affected local governments;***
2. ***Demonstrated need for housing, employment opportunities, livability or uses such as public facilities, streets and roads, schools, parks or open space;***

Location Factors

3. ***Efficient accommodation of identified land needs;***
4. ***Orderly and economic provision of public facilities and services;***
5. ***Comparative environmental, energy, economic and social consequences; and***
6. ***Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the urban growth boundary.***

As noted in Goal 14 itself:

In determining need, local government may specify characteristics, such as parcel size, topography or proximity, necessary for land to be suitable for an identified need.

As explained in OAR 660-024-0060(5), cities may identify site requirements for needed employment and apply these requirements to address ORS 197.298 Priorities for urban growth boundary expansion:

In determining need, local government may specify characteristics, such as parcel size, topography or proximity, necessary for land to be suitable for an identified need and limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298.

SECTION 1: EMPLOYMENT LAND NEED

This section addresses Needs Factors 1 and 2 of Goal 14.

1.1 Goal 14, Need Factor 1

1. Demonstrated need to accommodate long range urban population growth, consistent with a 20-year population forecast coordinated with affected local governments;

Goal 14, Factor 1 addresses the need for population growth and housing. Although no residential land is proposed for inclusion within the UGB at this time, the City must show some relationship between projected population growth and projected employment growth as it relates to employment land need.

On June 17, 2009, the Lane County Board of Commissioners adopted a revised population forecast for Lane County and its cities. The coordinated 2029 population projection for Junction City is 12,922. Lane County contracted with Portland State University to prepare coordinated population projections for Lane County and each of its cities in 2008-09. The Center for Population Research recognized Junction City's unique employment opportunities by projecting an average annual population growth rate of 3.5% for Junction City from 2010-2030.¹ Employment growth is projected to increase most dramatically from 2010-2015, when the prison and hospital projects are scheduled for completion.²

As noted in the PSU Forecast (p. 33):

“Junction City. The jobs that the new group quarters [the state prison and hospital] facilities will create are assumed to increase the demand for new housing. The expansion of infrastructure will support growth; planning housing development and additional employers will also contribute to higher growth than in the past.”

This projection is consistent with the Junction City EOA, which determined that the composition of Junction City's economy will fundamentally change over the 20-year planning period, with the development of the State Prison and Hospital and decline of the RV Industry in Lane County. Table S-1 of the EOA shows the forecast of employment growth by building type/use in Junction City's UGB from 2009 to 2029. Employment is projected to increase from 3,481 in 2009 to 6,826 in 2029 – at an average annual growth rate of 3.4%. This is comparable to the 3.5% AAGR for population from 2010 to 2030 projected by PSU.

¹ Winterbrook calculated Junction City's population AAGR for the 20-year planning period from 2009-2029. Winterbrook assumed a 2009 population of 6,471 (halfway between the 2008 PSU estimates of 6,567 (2010) and 6,375 (2008)) and used the coordinated 2029 projection for Junction City of 12,922. The AAGR for the 20-year planning period is also 3.5%

² See The Population Forecast for Lane County, its Cities, and Unincorporated Area (2008-2035), Population Research Center, Portland State University, May 2009, p. 69.

Table S-1. Forecast of employment growth in by building type, Junction City UGB, 2009–2029

Building Type	2009		2029		Change 2009 to 2029
	Employment	% of Total	Employment	% of Total	
Industrial					
Industrial	946	27%	1,365	20%	419
Commercial					
Office	418	12%	683	10%	265
Retail	1,241	36%	1,707	25%	466
Other Services	506	15%	819	12%	313
Government	370	11%	2,253	33%	1,883
Total	3,481	100%	6,826	100%	3,345

Source: ECONorthwest

Need Factor 1 Conclusion

There is a direct relationship between the employment forecast in the Junction City EOA and Lane County's adopted and coordinated population forecast for Junction City. Population and employment growth rates are comparable; both are based on anticipated employment growth from the prison and hospital.

1.2 Goal 14, Need Factor 2

Need Factor 2, related to employment land need, is directly applicable to the proposed UGB expansion. Factor 2 is quoted and addressed below.

Factor 2: Demonstrated need for housing, employment opportunities, livability or uses such as public facilities, streets and roads, schools, parks or open space;

The following findings address Goal 14, Need Factor 2.

Employment Land Need Identified in the *Junction EOA*

Chapter 4 of the EOA presented an analysis of site needs for the 2009- 2029 planning period (Table 4-5). These findings focus on the 20-year planning period for purposes of determining the adequacy of the existing UGB to meet identified employment land needs.

Table S-3 summarizes site and land needed for employment uses *that do not have special site requirements* in Junction City for the 20-year planning period from 2009 to 2029.

Table S-3. Summary of employment land need, gross acres, Junction City UGB, 2009-2029

	Site Size (acres)							Total
	Less than 1	1 to 2	2 to 5	5 to 10	10 to 20	20 to 50	Greater than 50	
Industrial								
Sites needed	2	none	none	none	1	none	none	2
Land need (acres)	1	--	--	--	20	--	--	21
Commercial								
Sites needed	14	9	8	2	none	none	none	33
Land need (acres)	4	14	24	20	--	--	--	62
Total sites needed	16	9	8	2	1	--	--	36
Total acres needed	5	14	24	20	20	--	--	83

Source: ECONorthwest

Quoting from pages vii-vii of the EOA, Junction City has a deficit of the following land types in its UGB over the 20-year planning period.

***Industrial land need for a 20-acre site.** Table S-3 identifies a need for one 20 acre industrial site. This need may be accommodated on one of the 20 to 50 acre industrial sites within the UGB. (...)*

***Industrial redevelopment.** ECO also assumed that industrial land needs for sites smaller than ten acres would be addressed on larger industrial sites within the UGB and possibly through redevelopment of existing industrial sites.*

Commercial land needs.** Table S-3 shows that Junction City has a need for about 62 acres of commercial land, all on sites 10 acres or smaller. Junction City will need to explore strategies to provide enough commercial land within the existing UGB to accommodate expected commercial growth over the 2009 to 2029 period. These strategies must include consideration residential land needs, land use efficiency measures, and the potential to expand the UGB. **After completing the commercial and residential land needs analysis in Phase 2, there may be a need to expand the UGB to meet these needs as well.

From the above, it is clear that Junction City has sufficient industrial land within its UGB to accommodate industrial uses that do not have special site requirements. The Junction City Council has decided to postpone consideration of unmet commercial site needs until Phase 2 of the Customized Periodic Review process, when residential and commercial land needs can be considered together.

However, the EOA (p. viii) goes on to note that Junction City lacks sites within the existing UGB that meet identified site requirements for three types of land uses:

The Junction City will need to provide land for the following sites through a UGB expansion to accommodated growth over the 2009 to 2029 period:

- ***One approximately 235-acre site for the State Prison and Hospital.** The State has identified the site for these State Facilities.*
- ***One industrial site with at least 50 suitable acres to take advantage of a unique niche opportunity for rail-loop served bulk processors, such as Grain Millers.** Other needed characteristics of this site are described in Chapter 5.*

- **One 40 acre site for a wastewater facility expansion that is necessary to provide sanitary sewer service for the Prison and Hospital. The City has identified the site for the wastewater facility expansion.**

The following section identifies the specific site requirements from the EOA and explains why these site requirements cannot be met within the existing (pre-2009 amendments) UGB.

SECTION 2: EVALUATION OF ALTERNATIVE SITES AGAINST SITE SUITABILITY CRITERIA

2.1 Site Suitability Requirements Identified in the Junction City Economic Opportunities Analysis (EOA)

As explained in OAR 660-024-0060(5):

In determining need, local government may specify characteristics, such as parcel size, topography or proximity, necessary for land to be suitable for an identified need and limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298.

The Goal 9 Administrative Rule (OAR 660-009) requires that jurisdictions describe the characteristics of needed sites (OAR 660-009-0025(1)). The Administrative Rule defines site characteristics as follows in OAR 660-009-0005(11):

(11) "Site Characteristics" means the attributes of a site necessary for a particular industrial or other employment use to operate. Site characteristics include, but are not limited to, a minimum acreage or site configuration including shape and topography, visibility, specific types or levels of public facilities, services or energy infrastructure, or proximity to a particular transportation or freight facility such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes.

As prescribed in Goal 14:

Prior to expanding an urban growth boundary, local governments shall demonstrate that needs cannot reasonably be accommodated on land already inside the urban growth boundary.

Need and Supply of Residential Land within the Existing UGB

The City begins its alternative sites analysis by reviewing residential land need and supply within the existing UGB. The purpose of this analysis is to determine whether the City has a surplus of residential land that might be available to meet identified large-site employment needs. To make this determination, the City reviewed Appendix C to the acknowledged

Junction City Comprehensive Plan.³ Table 11 of Appendix C, Land Needs Assessment, compared residential land need and supply within the Junction City UGB through the planning period ending in 2020. As noted in Appendix C, page 15:

This analysis is based on documented need for a total of 3,830 dwelling units in 2020. There is a deficit of about 135 vacant buildable acres of residential land inside the UGB – about 115 acres of low density residential and about 19 acres of medium density residential.

Applying a 20% gross-to-net factor for streets, the residential land deficit came to 105 net buildable LDR acres and 17 net buildable MDR acres. To address this deficit, the City amended the Comprehensive Plan map for the Oaklea site to increase the residential buildable land supply by 183 net buildable acres: 18 MDR acres and 165 LDR acres. This resulted in an oversupply of residential land of 61 net buildable residential acres. However, it later became apparent that more than half of the 165 net “buildable” LDR acres were in fact unbuildable due to severe wetland constraints.⁴ So, based on a 2020 population projection of 8,130, the acknowledged “Land Needs Assessment”, and the documented presence of wetlands in LDR land on the Oaklea site, there is a substantial deficit of buildable residential land within the Junction City UGB. However, the size of this deficit cannot be determined with certainty until a revised housing needs analysis has been completed.

Junction City is scheduled to update its housing needs analysis and residential buildable lands inventory in Phase 2 of the City’s Customized Periodic Review work program. It is likely that increased land costs and housing prices will result in higher projected residential densities than determined in 2002. However, the revised and coordinated Year 2029 population projection includes a population of about 13,000 – over 50% higher than the existing 2020 forecast. This large increase in population, as well as information in the acknowledged Comprehensive Plan, and wetland delineations documented in the Preliminary Local Wetlands Inventory, indicate that there is a deficit of residential land in the existing Junction City UGB. Therefore, the City concludes that residentially-designated land cannot be used to meet identified meet large-site employment needs without jeopardizing compliance with Goal 10, Housing.

There is also an unmet commercial land need that could possibly be met by allowing a broader array of employment uses on the 85-acre Oaklea site. During the public hearing process before the Junction City Planning Commission and Council, there was considerable debate about the most appropriate use of the 70 buildable acres on this site: consultants recommended that this site be used a mixed light-industrial / commercial “business park” while property owners west of

³ This appendix is entitled “Land Needs Assessment” and was adopted by the City in 2001 (Ordinance 1094) and Lane County in 2002 (Ordinance PA-1135). Significantly, Appendix C included a 20-year population projection for Junction City, which served as the basis for the City’s housing needs analysis.

⁴ The presence of wetlands west of Flat Creek on the Oaklea site is documented in the Attachment 4, *Preliminary Local Wetland Inventory Report* for the Area within the Junction City Urban Growth Boundary (Winterbrook Planning, June 2009).

Highway 99S argued that this site is better suited to meet residential land needs. The Council determined that the use of the Oaklea site should be determined after a revised housing needs analysis has been prepared and approved by the City in Phase 2 of the Customized Periodic Review process. It is clear from the record, however, that the Oaklea site is required to meet either employment or residential land needs.

In subsequent sections, these findings consider the potential for designated employment lands within UGB and within nearby exception areas to meet large-site employment and public facility needs.

2.2 Site Requirements for the State Prison and Hospital

The Junction City EOA (pp. 62-64) is explicit regarding the site requirements for the State Prison and Hospital. The Department of Corrections (DOC) followed an extensive statewide process in 1997 prior to making the decision to use its statutory authority to site the prison at the "Milliron Road" site.⁵ The decision to include the State Hospital on the northern portion of this site (the part within the existing UGB) was made in 2005.

The State of Oregon has acquired land to develop a State Prison and Hospital on an approximately 236-acre site that is located at the south end of Junction City's UGB. About 71 acres of the site is within the current UGB; some of which is reserved for the State Hospital. The southern portion of the hospital site, combined with the adjacent 165 acres located outside the UGB, uniquely meets identified site requirements as demonstrated below.

The Department of Corrections (DOC) identified the Milliron Road site in Junction City as a preferred site for a State Prison. The Junction City EOA summarizes these site requirements on pages 62-64 as follows:

1. **Site size.** *The State identified need for a site between 200 to 300 acres, with space to accommodate setbacks around the perimeter of the facility. The preferred site configuration is relatively rectilinear.*
2. **Land ownership.** *ORS 270.100 requires that the State consider siting facilities on state-owned property prior to state acquisition of private land.*
3. **Topography.** *The site should be relatively flat to minimize earthwork, foundation, and construction costs and surface/subsurface drainage construction costs.*
4. **Natural hazards.** *The site should not be subject to natural hazards that cannot be mitigated for. For example, the site should not be located in a designated tsunami inundation zone and should not be unduly prone to liquefaction due to seismic activity. If the site is located with the 100-year floodplain or other flooding hazards, the site should be big enough to locate the building away from the flooding hazard and/or mitigation of flooding hazards should be possible through raising site grades or providing positive drainage features.*

⁵ The needed site characteristics are based on information documented in: "Findings, Conditions and Decision: Milliron Road and Stimpson Gulch: Sites Selected by the Siting Authority of Men's Medium Security Prison Complex," May 20, 1997.

5. **Street access.** *The site should be served by a road and road system capable of supporting the prison. The site should have access to a state Highway and be within close proximity to I-5.*
6. **Access to services.** *The site should be serviceable for water, sanitary sewer, stormwater, telecommunications, electricity, and natural gas, oil, or propane.*
7. **Surrounding uses.** *The surrounding uses should be compatible with a prison. Preferred surrounding uses natural features (e.g., a lake), industrial uses, or agricultural uses. The State prefers that adjacent uses not include housing and does not allow siting adjacent to a school.*

The State plans to replace the existing Oregon State Psychiatric Hospital with a hospital in the Salem area and a hospital in the Southern Willamette Valley. The State's preferred site is the northern part of the Department of Correction site, which is located at the southern boundary of Junction City's UGB.⁶ The State identified the following criteria as necessary for siting the new State Hospital:

1. **Land ownership.** *ORS 270.100 requires that the State consider siting facilities on state-owned property prior to state acquisition of private land.*
2. **Site size.** *The site should be large enough to accommodate the Hospital and provide opportunities for future expansion of the hospital.*
3. **Site buildability and configuration.** *The shape of the site should not inhibit development and the site should be contiguous (without any gaps or barriers) The unusable land (wetlands, utility easements, etc.) would be as minimal as possible.*
4. **Topography.** *The site should be relatively flat, with no steep or unbuildable slopes.*
5. **Street access.** *The site should be served by a road and road system capable of supporting the prison. It is preferable that the site have access to a State Highway and be within close proximity to I-5.*
6. **Access to services.** *The site should be serviceable for water, sanitary sewer, stormwater, telecommunications, electricity, and natural gas, oil, or propane.*
7. **Surrounding uses.** *The surrounding uses should be compatible with a State Hospital. Preferred surrounding uses natural features (e.g., a lake), industrial uses, or agricultural uses. The State prefers that adjacent uses not include housing and does not allow siting adjacent to a school.*

Alternatives for Meeting Identified Site Requirements

After conducting a statewide study that included land within the Junction City UGB,⁷ the DOC concluded that the 236-acre site inside and south of the Junction City UGB best met the state's

⁶ The site needs for the State Hospital are described in the document "Oregon State Psychiatric Hospital Replacement: Site Recommendations." This document can be found at: <https://apps.dhs.state.or.us/cfm/oshp/documents/recommendations.pdf>

⁷ The owners of the 320-acre Oaklea site requested that DOC consider the Oaklea Site for the prison facility. The DOC rejected this site because of nearby residential land uses in 1997. In 2002, most of the Oaklea site was re-designated for residential use; 85 gross acres (70 buildable) has retained its PT (Professional Technical) plan designation.

Conclusion Regarding the Capacity of the Existing UGB to Meet Prison Siting Needs

The State Prison site resulted from an extensive statewide search. The selection of this site was endorsed by the Junction City Council in 1997. There are no employment sites or exception area tracts that meet the size the State Prison's site size requirements. The 236-acre site shown on Map 2 (which includes 71 acres already within the UGB) uniquely meets the site requirements identified by the Department of Corrections and included in the Junction City EOA.

2.3 Site Requirements for Expansion of the Wastewater Treatment Plant

The City needs a site for the expansion of the wastewater treatment plant (WWTP) that will support the State Prison and Hospital as well as planned, long-term growth in Junction City. The WWTP expansion site must be large enough to accommodate the following sewage treatment alternatives: a mechanical (activated sludge process) wastewater treatment plant, a facultative lagoon, a facultative sludge lagoon to process bio-solids from the mechanical wastewater treatment plant, spray irrigation of final effluent disposal and buffers for .

The site needs for the City's wastewater system are:

1. **Location.** The site must be located adjacent to the City's existing wastewater facility and UGB.
2. **Land Use Conflicts.** The site should not increase or create conflicts with existing or planned residential uses.
3. **Site size.** The City needs approximately 80 acres for new wastewater facilities. Half of this needed land is owned by the City and within the Junction City UGB. The land can be in more than one parcel but the parcels need to be contiguous to one another.
4. **Land ownership.** The City prefers land that is in City ownership.
5. **Street access.** The site needs to be accessible through the local road network.
6. **Topography.** The site should be virtually flat (about 1% slope) to minimize construction costs.

Alternatives for Meeting Identified WWTP Site Requirements

Two sites potentially meet the size and adjacency criteria: one is owned by the City and borders the existing WWTP with access from High Pass Road; and the other is owned by Oaklea Enterprises and is designated for Professional Technical (PT) use.

- **Alternative 1:** Junction City owns a flat, 40-acre parcel located between High Pass Road and the existing WWTP lagoon system and therefore meets Criteria 1, 3, 4, 5 and 6. This parcel lies west of and abuts a vacant 40-acre City parcel within the existing UGB that has been reserved for WWTP expansion for many years. Together, these two parcels comprise the required 80 acres located between the existing WWTP and High Pass Road.

The vacant 40-acre City parcel proposed for inclusion within the UGB poses no land use conflicts, because it abuts City owned WWTP property on two sides and EFU land to the west and south (across High Pass Road). Part of this vacant parcel within the existing UGB and reserved for WWTP use abuts (for a short distance) the PT site to the east.

- **Alternative 2:** Oaklea Enterprises owns a flat, 85-acre parcel located between Oaklea Road and the existing WWTP lagoon system and therefore meets Criteria 1, 3, 5 and 6. Because the PT site is privately owned, it does not meet the fourth criteria.

This parcel lies east of and abuts (for about a fifth of the PT site's western property line) the vacant 40-acre City parcel within the existing UGB that has been reserved for WWTP expansion for many years. The Oaklea PT site also abuts the existing sewage lagoons for four-fifths of its shared western property line. Together, the City-owned parcel within the UGB plus the Oaklea PT site comprise more than the required 80 acres, meaning that about 45 acres of the Oaklea PT site would need to be used for another urban purpose.

Significantly, use of the western portion of the vacant 85-acre Oaklea PT site for WWTP use would pose major land use conflicts with recently-approved residential development to the north – and with future residential or mixed-use employment uses on the eastern portion of the site. Moreover, the Oaklea parcel is needed for urban employment and/or residential uses. (See discussion regarding residential land need and supply on pages 6-7 of these findings.)

Conclusion Regarding the WWTP Expansion Site

The City-owned parcel is surrounded on two sides by land that is currently used for WWTP lagoons or has been reserved for this use for many years. The City site poses no significant land conflicts and meets all six of the criteria listed above.

In contrast, use of the privately-owned Oaklea PT site for WWTP expansion would result in major conflicts with approved residential development to the north and potential residential / mixed use development to the east. Because there is unmet need for both commercial and residential land uses within the existing Junction City UGB, use of the Oaklea Enterprises site for WWTP expansion would mean that other rural lands would need to be included in Phase 2 to meet these identified needs in any case.

2.4 Site Requirements for Rail-Dependent, Bulk Process Industrial Firm

As documented in the Junction City EOA, there is an identified need for a large, rail-dependent bulk-processing industrial site. Grain Millers provides a timely and representative example of such a site, which currently has a manufacturing facility in downtown Eugene. Grain Millers is looking for a new site to expand its operations on because the facility in downtown Eugene does not have room for expansion. Should the Junction City site not be brought into the UGB, Grain Millers has made it clear that it has an alternative site with rail access in Longview, Washington.

As documented on pages 60-62 of the EOA, Grain Millers requirements for a new site are:

- **Site size.** *Grain Millers needs a site that has at least 45 acres of suitable land (i.e., unconstrained land after wetland and floodway areas are discounted or mitigated) and 5 acres for outdoor test plots. Grain Millers initially requires a site with 30 acres of suitable land for development when it moves its facility, 15 acres of land for expansion of their facility over the planning period, and five acres of land for test plots. The site must have a minimum development width of 750 feet.*

- **Rail access.** Grain Millers requires a site that has immediate rail access with the ability to incorporate an inbound and outbound rail switch. The company's rail requirements are:
 - The rail service must have the ability to accommodate 3,250 linear feet of track (without use of an on-site rail switch) for storage space of up to 50 car unit trains. Grain Millers has a preference for a site that can accommodate an additional 2,450 linear feet of track, with a maximum of two on-site switches, for maneuvering railcars for loading and unloading.
 - The on-site turning radiuses cannot be less than 604 feet.
 - On-site rail cannot impede inbound and outbound vehicular traffic to the site.
 - The ideal site would be located between two railroads to allow for build-out of rail infrastructure.
- **Other transportation access.** The site must have immediate access to Highway 99 for freight movement. The freight traffic from industrial sites should not be routed through residential neighborhoods. Grain Millers also needs access to an airport for air transportation.
- **Topography.** The site should be very flat, with a slope not greater than 1% to best suit the rail uses.
- **Access to services.** The site will need to have access to services: (1) electricity service of 6 megawatts, with the ability to expand to 9 megawatts; (2) service for about 800,000 therms of natural gas; (3) municipal water service for about 13,000,000 gallons annually; and (4) sanitary sewer service for 5,000,000 gallons annually.
- **Land ownership.** A site with a single owner is strongly preferred, to reduce the cost of land assembly.
- **Surrounding land uses.** The site should be located near compatible uses, such as other industrial uses, some types of commercial uses, such as a business park, or compatible government uses. The site should not be located adjacent to an urban residential area.

Grain Millers strongly prefers a site located in the Southern Willamette Valley for the following reasons:

- **Availability of workers.** Grain Millers regards its labor force as the company's most significant asset and employee retention is an important factor in site selection. In addition, Grain Millers benefits from access to the regional pool of skilled labor and access to Oregon State University, a nationally premier agricultural school.
- **Access to markets and customers.** Forty percent of Grain Miller's sales are to companies located in Oregon, 20% are to companies in California, and 20% are to companies in Washington, Idaho, and Vancouver, BC. In addition, three of Grain Millers largest customers are located within 15 miles of Junction City. A location in the Southern Willamette Valley provides Grain Millers with comparatively low transportation costs to its customers.
- **Access to materials.** A significant amount of the raw agricultural materials used by Grain Millers is grown in Oregon, Washington, Idaho, and California. In addition, Grain

Millers prefers a site with proximity to a port capable of economy-of-scale deliveries from Pacific Rim countries that grow grains compatible with Grain Millers' processing

- **Support from regional market clusters.** *The local pulp and paper industry built an infrastructure necessary for mills, such as fabrication, repair, and other services. Grain Millers prefers a location that allows it to access this industrial infrastructure.*

Alternatives for Meeting Identified Rail-Dependent Industrial Site Requirements

The UGB Expansion Alternatives Analysis to Accommodate Large Rail Dependent Bulk Processing Use (Winterbrook Planning, July 23, 2009) is Attachment 5 to these findings. In Attachment 5, Winterbrook translated the site requirements described above into two measurable standards that can be mapped using GIS technology and applied these standards to all land within a mile of the existing UGB:

1. 50 acres tract minimum: 45 suitable acres (i.e., land outside of probable wetland areas) plus 5 acres for an agricultural test plot;
2. Direct rail access that is of sufficient size and shape to accommodate at least 3,250 linear feet of on-site track with a turning radius of at least 604 feet (i.e., a site with roughly 2,600 feet (about a half mile) of rail frontage and with sufficient depth to accommodate the required turning radius);

Winterbrook found that there was one site within the UGB and 10 sites outside the UGB that met preliminary size and rail access standards. There were no other vacant 50-acre tracts with sufficient rail frontage within the UGB or within exception areas within a mile of the UGB. Ten of the 11 vacant 50-acre tracts with sufficient rail frontage are located on land zoned for Exclusive Farm Use.

- Two of the candidate tracts are owned by the Department of Corrections and are reserved for State Hospital and Prison use – including the only potentially suitable site within the UGB. These sites were removed from further consideration because they are not available to meet identified rail-dependent siting needs.
- Two of the candidate tracts outside the UGB lacked 45 acres of suitable land (i.e., land with non-hydric soils outside the floodway) and were removed from further consideration.

Winterbrook next considered ORS 197.298 Priorities for urban growth boundary expansion: five of the remaining tracts are located on land with Class I agricultural soils, which are the lowest priority for inclusion within a UGB. These tracts are located east and north of the existing UGB. These tracts were removed from further consideration because they are lowest priority for UGB expansion under state statute.

Two tracts, however, are located on land without Class I soils: Grain Millers and Ayres.

Winterbrook reviewed the two remaining tracts to determine the extent to which they had direct access to Highway 99S and to readily available sanitary sewer and water service extensions. Winterbrook also considered other site preferences identified in the EOA.

The Grain Millers site clearly had the *most* direct access to the Highway 99S (via Meadowview Road) and City services. The Grain Millers site ranked higher on highway and airport access and serviceability criteria primarily because of its location next to the State Prison site: City sanitary sewer and water services are already being extended to serve the State Prison site and there are no plans to extend services north of the UGB.

Moreover, the Ayres site is about three-quarters of a mile from the existing UGB and has a high proportion of Class II agricultural soils. In contrast, the Grain Millers site has roughly equal proportions of Class II and IV soils, and abuts the State Prison site which is planned for inclusion within the UGB.

Conclusion Regarding the Rail-Dependent Industrial Site

Winterbrook reviewed 11 potential tracts that met the size and railroad access requirements for a rail-dependent bulk processing use – both within and outside the UGB.

- Two of the tracts are reserved for state institutional uses; two of the tracts lack sufficient suitable land to accommodate Grain Millers needs.
- Five the tracts were located on Class I agricultural soils which are lowest priority for inclusion within a UGB under state statute – leaving two potential sites.

Of these, the Grain Millers site clearly had the *most* direct access to the highway, airport and City sewer and water facilities and has the lowest quality agricultural soils of any of the available sites outside the UGB.

SECTION 3: UGB EXPANSION ALTERNATIVES ANALYSIS: ORS 197.298 AND GOAL 14 LOCATIONAL FACTORS

As explained in OAR 660-024-0060(5):

In determining need, local government may specify characteristics, such as parcel size, topography or proximity, necessary for land to be suitable for an identified need and limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298.

The findings and analysis in Sections 1 and 2 of these findings demonstrate that there are no suitable sites within the existing UGB that have the site characteristics required by the State Prison, the WWTP, or the rail-dependent industrial use. The findings and analysis in Section 2 demonstrate that identified site requirements for the State Hospital and Prison can *only* be met on the 236-acre tract owned by the Department of Corrections. Section 2 also demonstrates that the City-owned parcel that abuts the existing WTPP site on two sides *uniquely* meets identified WWTP expansion requirements. The alternatives analysis for the rail-dependent bulk-processing industrial use has already considered ORS 197.298 Priorities for urban growth boundary expansion.

Arguably, therefore, no purpose is served by further consideration ORS 197.298 and Goal 14 locational factors. Nevertheless, Section 3 includes additional findings demonstrating compliance with ORS 197.298 priorities and Goal 14 locational factors.

3.1 ORS 197.298 Priorities for Urban Growth Boundary Expansion

In Junction City, the highest priority for UGB expansion is land within exception areas, followed by lower value agricultural land with predominantly Class III +soils, followed by agricultural land with large concentrations of Class II soils, followed by agricultural land with large concentrations of Class I soils.

Evaluation of Nearby Exception Areas

Under ORS 197.298, land within the URA is “first priority” for inclusion within a UGB. However, Junction City does not have an acknowledged URA. For Junction City, then, the first priority for meeting UGB expansion needs is rural exception areas. Map 2: Junction City UGB Study Area shows exception areas and agricultural soil classifications within 1.25 miles of the existing UGB. All three of the uses with special site needs require vacant sites of at least 40 acres with specific rail or road access requirements. A review of Map 2 (and the analysis in Section 2) shows that there are no vacant exception area parcels of this size that meet identified access (and other) site requirements.

Evaluation of Agricultural Land by Agricultural Suitability Class

Map 2 shows the following:

- **Lower priority agricultural land.** Higher value agricultural land (land with concentrations of Class I soil) generally is found to the east and north of the existing UGB. There are also concentrations of Class I and II soils located on either side of Oregon Highway 36 (west of Highway 99S) and in the High Pass Road area. Class I and II soils are, by definition, are *not* hydric soils – because they are relatively well-drained. Therefore, Class I and II soils are suitable for most types of urban development.
- **Medium priority agricultural land.** Medium value agricultural land (with large concentrations of Class II well-drained soils comingled with Class III + hydric soils) generally are located south of Oregon Highway 36, immediately west of the UGB and south of High Pass Road, and immediately south of the UGB and east of Highway 99S. These areas have substantial development potential but require wetland mitigation. These “medium priority” agricultural soils
- **Higher priority agricultural land.** Lower value agricultural land with predominantly Class III + hydric soils generally is found to the northwest and west of the existing UGB, with the exceptions noted above. However, areas with predominantly hydric soils that lack concentrations of well-drained Class I and II soils are not suitable for most types of urban development.

As documented in Section 2, the State Prison and Grain Millers have specific siting requirements that cannot be met on higher priority (lower value) agricultural land with

predominantly hydric soils to the west and northwest of the UGB. Land with high concentrations of hydric soils (higher priority Class III + soils) do not include enough suitable land to meet the spatial needs of the State Prison and Grain Millers.

However, suitable sites for these employment uses are provided on “medium priority” agricultural land south of the existing UGB. Both of these sites have concentrations of suitable Class II soils. Due to the presence of hydric soils on each site, substantial wetland mitigation will be necessary to provide sufficient suitable land for the siting of institutional and industrial facilities. As documented in Attachment 5, it was not necessary to include lower priority agricultural land with concentrations of Class I soils to meet identified siting requirements.

As shown Map 2, the 40-acre City-owned WWTP expansion site that uniquely meets identified siting requirements has predominantly Class IV + agricultural soils; Class I and II soils located at the southwest portion of the 40-acre parcel. Overall, this site is comprised of “medium priority” agricultural land. Due to the presence of wetlands on the site, substantial wetland mitigation will be required and the efficiency of site development is reduced. If the entire site were comprised of hydric soils, the site would have no suitable land for WWTP facilities and the costs for wetland mitigation increase proportionately.

Conclusion

The State Prison, Grain Millers and the WWTP site are located on “medium priority” agricultural lands. There are no sites on “higher priority” (lower quality) agricultural lands that meet identified siting criteria.

3.2 Findings Demonstrating Consistency with Goal 14 Location Factors 3 – 6

The four Goal 14 location factors are: (1) Efficient accommodation of identified land needs; (2) Orderly and economic provision of public facilities and services; (3) Comparative environmental, energy, economic and social consequences; and (4) Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB.

The State Prison, Grain Millers and the WWTP each have specific site size and access requirements that can only be met on the sites proposed for UGB expansion. Nevertheless, additional findings showing consideration of Goal 14 locational factors are provided below.

Factor 3: Efficient accommodation of identified land needs

There are no alternatives available to the State Prison, Grain Millers and the WWTP that can accommodate these proposed uses more efficiently than the sites included in the expanded UGB.

- Because the locations for both the State Hospital and Prison were determined through a statewide siting process, the local consideration of alternative sites for these uses serves no purpose. There are no alternatives within or outside the existing UGB that could possibly meet the siting requirements of these state institutions.

- Grain Millers requires 45 suitable acres for construction of its rail-dependent industrial facility. As noted in Section 2 of these findings, there are two "medium priority" sites that met basic site requirements: Grain Millers and Ayres. Inclusion of the Grain Millers within the UGB results in a much more efficient land use pattern than would inclusion of the Ayres site. The Ayres site is located three-quarters of a mile from the existing UGB in any area without planned urban services. In contrast, the Grain Millers site is adjacent to the State Prison site and is located in an area that will soon have City sanitary sewer and water service.
- The location of the WWTP expansion site is part of a quarter section (160 acres) owned by the City and intended for this public facility use. Half of this land (80 acres) is already committed to sewage lagoons inside the UGB; the third quarter is also inside the UGB and reserved for WWTP use; the fourth quarter "completes the square" and thereby allows efficient use of the overall city ownership.

Factor 4: Orderly and economic provision of public facilities and services

As stated in OAR 660-009-0005(9):

"Serviceable" means the city or county has determined that public facilities and transportation facilities, as defined by OAR Chapter 660, Divisions 011 and 012, currently have adequate capacity for development planned in the service area where the site is located or can be upgraded to have adequate capacity within the 20-year planning period."

The Department of Corrections is committed to paying the bulk of the costs for extending sanitary sewer and water services to the State Hospital and Prison. These services can be extended in an orderly and efficient manner to serve the Grain Millers site in the near-term.

Expansion of the WWTP is necessary to serve state institutions and the Grain Millers site. And, orderly and economic expansion of the WWTP is necessary to provide sanitary sewer service to these two major employers. As documented above and in WWTP studies completed by Westech Engineering, the most economic expansion site for the WWTP is the 40-acre City parcel proposed for UGB expansion.

Factor 5: Comparative environmental, energy, economic and social consequences

Environmental Consequences

Development of all three sites proposed for inclusion within the UGB will have adverse impacts on wetlands. These impacts will be mitigated through compliance with DSL fill and removal law.

Hydric soils, which are strongly indicative of wetlands, are present on most large parcels surrounding the Junction City UGB. The sites proposed for inclusion within the UGB each have inclusions of Class I and II (the WWTP site) and II (the Grain Millers and State Hospital sites), which allows development to occur on part of these sites without directly impacting wetlands.

As documented in Section 3.1 above, the only areas surrounding the UGB that *don't have* predominantly Class I and II soils *do have* hydric soils, which are indicative of wetlands. So, the trade-off is between development on well-drained agricultural soils (which is limited by ORS 197.298) and development on hydric soils, which has unavoidable wetland impacts.

Energy Consequences

The State Hospital and Prison, and Grain Millers are located approximately three miles from central Junction City, which means that Junction City employees will have longer travel distances than if these facilities were located closer to the City core.

On the other hand, these facilities will draw employees and visitors from the Eugene-Springfield area and beyond. These facilities central location of these facilities between Eugene and Junction City, near the airport, will decrease vehicle miles traveled for those travelling from the south or by air.

The location of the WTP site adjacent to the existing site will have positive energy consequences (less travel required and less energy consumed by mechanical equipment and pumping), compared with locating these facilities on a site that is further from the base facility.

Economic Consequences

The economic consequences of siting State Prison and Hospital, and Grain Millers at the proposed locations are extremely positive – as documented in the EOA. On the other hand, attempting to locate these facilities elsewhere near the UGB would have extremely negative consequences – because the State facilities were chosen through a statewide review process and there were no other sites that were seriously considered in the Junction City area. If sanitary sewer and water services were not extended to the state facilities adjacent to the Grain Millers site, the Grain Millers site would not have met identified siting requirements and in all likelihood would not be locating in the Junction City area.

The economic consequences of locating the WWTP expansion site adjacent to the existing site are also positive; the cost of acquiring a site further from the existing WWTP would be high and the operational costs would increase substantially – when compared with an expansion site more distant from the base WWTP.

Social Consequences

As noted in the EOA, the development of the State Prison and Hospital, combined with anticipated Grain Millers employment, will create approximately 1,900 jobs which will help bring prosperity to the Junction City area – with attendant positive social consequences. These positive social consequences would not occur on alternative sites surrounding Junction City, because the state did not come close to choosing alternative sites in this area.

The social consequences of expanding the WWTP site on rural land owned by the City are positive because adverse impacts on urban residential uses will be minimized. If the WWTP were expanded within the UGB, impacts on urban residential development would be severe.

Factor 6: Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the urban growth boundary

Impacts on agricultural land were considered in the state siting process. The State Prison as a use is unlikely to have adverse impacts on nearby agricultural land because activities are generally confined within prison walls. The State Prison site is separated from agricultural land by two railroad tracks and Highway 99S to the east and west. The northern boundary of the site is within the UGB. The Prison Site abuts Grain Millers for half of its common boundary. This is a shared boundary with agricultural land to the southeast; however, as noted above, it is doubtful whether conflicts will result from prison activities and adjacent farming operations. Based on a review of Map 2, there are no other sites with 326 acres adjacent to the UGB that would have less impact on adjacent agricultural land, because there are no other sites in that size range that are bordered on two sides by major public facilities and on the third side by the UGB.

Grain Millers is an agriculturally-based bulk processing facility that requires rail access. Grain Millers will be farming on a small portion of the site. As such, there are no inherent conflicts between Grain Millers and agricultural uses. The Grain Millers site is bounded by the State Prison and on the north, Highway 99S and a railroad on the west, and Meadowview Road on the south. There is a shared boundary with agricultural land to the east; however, as noted above, it is unlikely that conflicts will result from this agricultural products processing facility locating adjacent to farming operations. In any case, as shown in Attachment 5, each of the available options for Grain Millers would have greater adverse impacts on adjacent agricultural land than the site selected by Grain Millers, because each alternative has longer unbuffered (by major streets, railroads or urban uses) boundaries adjacent to agricultural land than does the Grain Millers site.⁹

The WWTP use is compatible with agricultural land. The existing WWTP has been in operation for several decades without adversely affecting adjacent farming operations. Spray irrigation of treated wastewater on agricultural land is considered an option and is compatible with agricultural uses. The proposed expansion site is bordered on two sides by City owned land within the UGB and on the third side by High Pass Road, thus minimizing potential conflicts with nearby agricultural activities.

SECTION 4: STATEWIDE GOAL CONSISTENCY ANALYSIS

This section addresses compliance with applicable Statewide Planning Goals.

⁹ The Franklin site located east of Grain Millers along Meadowview Road has similar locational characteristics in terms of common boundaries with agricultural land, but did not have enough suitable land to meet Grain Millers identified site requirements.

Goal 1 Citizen Involvement

Goal 1 calls for the opportunity for citizens to be involved in all phases of the planning process. As documented on the City's website, The City engaged in an eight month public involvement process which ran from October 2008 – May 2009. Each of the Citizens Comprehensive Planning Committee meetings was publicly noticed and public comments were welcomed. These meetings resulted in a series of draft Economic Opportunities Analyses (EOAs) that were available on the City's website and at City Hall. The CCPC considered public testimony (which included testimony from "Westsider" property owners and their attorneys) at its May 13, 2009 meeting and decided to allow additional testimony at a special May 27, 2009 meeting. The CCPC presented its recommendations to the Planning Commission prior to public hearings on adoption of the EOA and related Comprehensive Plan amendments.

The City also coordinated with state agencies and Lane County, as documented in CCPC, Planning Commission and City Council minutes.

Process concerns were raised by property owners (and their attorneys) west of Highway 99S who wanted their land to be included within the UGB and designated for commercial use. The property owners actively participated in duly noted Planning Commission and City Council work sessions and public hearings held before the Planning Commission and Council in May and June of 2009.. Information and updated reports requested by property owners and their attorneys was provided in a timely manner. As noted under Goal 2, comments from "Westsider" property owners and their attorneys were considered and resulted in changes to the City's Customized Periodic Review work program. The City did not, however, make changes to basic assumptions and methods in the EOA to achieve a specific result, as requested by property owners and their attorneys.

In conclusion, the City's public and agency review process complies with Goal 1.

Goal 2 Land Use Planning

Goal 2 (Land Use Planning) outlines the basic procedures of Oregon's statewide planning program, stating that land use decisions must be made in accordance with comprehensive plans and that effective implementation ordinances must be adopted. In the process of developing the EOA, the City has inventoried existing employment land uses, projected suitable land needs by land use classifications, and compared these needs with potentially suitable land within the Junction City urban growth area. The resolution of land need and supply is found in the *Junction City EOA* and in the revised *Junction City Comprehensive Plan* (2009).

Goal 2 also requires the consideration of alternatives.

- The CCPC considered a range of alternatives in developing the EOA:
- The Oregon Department of Corrections considered alternatives for the State Prison and Hospital through an open, statewide process.
- Alternatives for the siting of Grain Millers were considered in Attachment 4.

- The suitable lands inventory was amended in part due to comments from Westsider property owners related to wetland protection.
- City staff developed an Option 2 that postponed final determination regarding the potential to meet commercial land needs within the UGB until residential land need and supply issues are addressed in Phase 2 of the Customized Periodic Review process.
- The EOA was amended to take into account comments from "Westsider" property owners and their attorneys – as well as Option 2.
- The Planning Commission and City Council considered the "Westsidiers" Option 3 (change assumptions to justify inclusion of additional commercial land outside the UGB) but rejected this option in significant part due to concerns from the Department of Land Conservation (July 7, 2009 letter).

All pertinent documentation has been made available to all interested parties. Goal 2 has been properly addressed.

Goals 3 Agricultural Lands and 4 Forest Lands

Goal 3 requires counties to inventory agricultural lands and to maintain and preserve them through EFU zoning. Goal 4 requires counties to inventory forestlands and adopt policies that will conserve forest uses. As stated in 660-024-0020(b), Goals 3 and 4 are not applicable when establishing or amending an urban growth boundary. No further analysis is required.

Goal 5 Open Spaces, Scenic and Historic Areas & Natural Resources

Goal 5 requires local governments to inventory and protect natural resources. There are no inventoried significant Goal 5 resources in any of the areas included within the UGB.

The City prepared a Preliminary Local Wetlands Inventory (LWI) to assess the suitability of employment land within the Junction City UGB. The City coordinated with DSL in this process, as shown in Attachment 4. The LWI will be completed in Phase II of the Customized Periodic Review work program and will be considered through the Goal 5 process in Phase II.

Goal 6 Air, Water and Land Resources Quality

Goal 6 requires local comprehensive plans and implementing measures to be consistent with state and federal regulations. By complying with applicable air, water and land resource quality policies in the Junction City Comprehensive Plan, Goal 6 will be properly addressed.

Goal 7 Areas Subject to Natural Disasters and Hazards

Goal 7 requires that jurisdictions apply appropriate safeguards when planning development in areas that are subject to natural hazards such as flood hazards. The only identified natural hazard in Junction City is flooding. Junction City has an acknowledged floodplain protection ordinance. Land within the floodway is considered unsuitable for urban development. However, none of the sites included within the UGB are within the 100-year floodplain. Thus, Goal 7 has been properly addressed.

Goal 8 Recreation Needs

Not applicable.

Goal 9 Economy of the State

The City contracted with ECONorthwest to prepare a series of drafts of the Junction City Economic Opportunity Analysis (EOA) in compliance with Goal 9 and its implementing administrative rule. A UGB expansion is proposed to meet identified large-site employment and public facility needs. No additional industrial land is needed within the UGB. The EOA also identifies commercial land needs through 2029. The determination of whether the UGB can accommodate these needs has been postponed until Phase II of the CPR process when residential land need and supply will also be considered (since residential land needs may compete for some of the same properties as commercial needs). DLCD has reviewed the draft EOA and changes to the CPR work program (Option 2), and determined that Goal 9 and 14 requirements had been met. (See July 7, 2009 letter). The City's EOA and Comprehensive Plan amendments comply with Goal 9.

Goal 10 Housing

Goal 10 will be addressed in Phase II of the CPR work program.

Goal 11 Public Facilities and Services

Westech Engineering was selected to prepare sanitary sewer and water plans to serve existing UGB plus UGB expansion need through the planning period. The record includes detailed plans showing the State Prison and Hospital and Grain Millers sites can be served.

Westech is also preparing plans for expansion of the WWTP to serve urban land through the 2029 planning period. A UGB amendment is approved as part of the Council's decision to accommodate WWTP expansion needs. The provisions of public facilities and services consequences have been considered in the Goal 14 alternatives analysis process. For the above reasons, Goal 11 has been adequately addressed.

Goal 12 Transportation

Goal 12 encourages the provision of a safe, convenient and economic transportation system. This goal also implements provisions of other statewide planning goals related to transportation planning in order to plan and develop transportation facilities and services in coordination with urban and rural development (OAR 660-012-0000(1)).

As stated in 660-024-0020(d):

“the transportation planning rule requirements under OAR 660-012-0060 need not be applied to an urban growth boundary amendment if the land added to the urban growth area is zoned as urbanizable land, either by retaining the zoning that was assigned prior to inclusion in the area or by assigning interim zoning that does not allow development that would generate more vehicle trips than development allowed by the zoning assigned prior to inclusion in the boundary.”

In a June 11, 2009 letter from ODOT, Area 5 Planner Savannah Crawford noted that TPR compliance was assured for the State Prison and Hospital. Since re-designating the Oaklea Professional Technical site was postponed, TPR compliance will be addressed in Phase II of the CPR work program.

Regarding Grain Millers, she suggested two conditions of approval to ensure compliance with OAR 660-012-0060:

Condition of Approval 1: "Prior to approval of annexation and/or zone change of subject property, applicant shall prepare an ODOT scoped and approved TIS and comply with the provisions of the TPR (OAR 660-012-060).

Conditional of Approval 2: "If analysis indicates significant effect per the TPR (OAR 660-012-060), applicant shall mitigate associated traffic impacts, as permitted and approved by the ODOT."

The City has agreed to these conditions in the Ordinance amending the UGB for the Grain Millers site. Therefore, Goal 12 is met.

Goal 13 Energy

Goal 13 requires land and uses developed on the land to be managed and controlled so as to maximize the conservation of all forms of energy, based upon sound economic principles. Energy consequences of the proposed urban growth area amendment have been considered in the Goal 14 alternatives analysis process. Therefore, Goal 13 has been adequately addressed.

Goal 14 Urbanization

Goal 14 has been complied with as demonstrated in Sections 2 and 3 of this report.

Goal 15 through 19

Goals 15 through 19 are related to the Willamette Greenway and coastal resources. As such, these goals do not apply to the subject sites and no further analysis is required.

Conclusion

- In accordance with Goal 14, Need Factor 1, there is a direct relationship between the employment forecast in the Junction City EOA and Lane County's adopted and coordinated population forecast for Junction City. Population and employment growth rates are comparable; both are based on anticipated employment growth from the prison and hospital.
- In accordance with Goal 14, Need Factor 2, the EOA determined that Junction City has sufficient industrial land within its UGB to accommodate industrial uses that do not have special site requirements. However, Junction City's EOA identifies a need for three types of land uses with specific siting requirements: the State Prison and Hospital site, the Grain Millers site, and the WWTTP site.
- The State Prison site resulted from an extensive statewide search. The selection of this site was endorsed by the Junction City Council in 1997. There are no employment sites or exception area tracts that meet the size the State Prison's site size requirements. The 236-acre site shown on Map 2 (which includes 71 acres already within the UGB) uniquely meets the site requirements identified by the Department of Corrections and included in the Junction City EOA.
- The City-owned WWTTP parcel is surrounded on two sides by land that is currently used for WWTP lagoons or has been reserved for this use for many years. The City site poses no significant land conflicts and meets all six of the WWTP siting criteria.
- Winterbrook reviewed all potential tracts that met the size and railroad access requirements for a rail-dependent bulk processing use – inside and within 1.25 miles of the UGB. The Grain Millers site clearly had the *most* direct access to the highway, airport and City sewer and water facilities and has the lowest quality agricultural soils of any of the potential sites.
- The State Prison, Grain Millers and the WWTTP site are located on "medium priority" agricultural lands. There are no sites on "higher priority" (lower quality) agricultural lands that meet identified siting criteria.
- Inclusion of the State Prison, Grain Millers and WWTTP sites is consistent with Goal 14 Factors 3-6, as well as all applicable Statewide Planning Goals.

CITY OF JUNCTION CITY
COMPREHENSIVE PLAN AMENDMENT AND URBAN GROWTH BOUNDARY (UGB)
FINDINGS (AUGUST 2009)

STATEWIDE GOAL CONSISTENCY ANALYSIS

This section addresses compliance with applicable Statewide Planning Goals.

Goal 1 Citizen Involvement

Goal 1 calls for the opportunity for citizens to be involved in all phases of the planning process. As documented on the City's website, The City engaged in an eight month public involvement process which ran from October 2008 – May 2009. Each of the Citizens Comprehensive Planning Committee meetings was publicly noticed and public comments were welcomed. These meetings resulted in a series of draft Economic Opportunities Analyses (EOAs) that were available on the City's website and at City Hall. The CCPC considered public testimony (which included testimony from "Westsider" property owners and their attorneys) at its May 13, 2009 meeting and decided to allow additional testimony at a special May 27, 2009 meeting. The CCPC presented its recommendations to the Planning Commission prior to public hearings on adoption of the EOA and related Comprehensive Plan amendments.

The City also coordinated with state agencies and Lane County, as documented in CCPC, Planning Commission and City Council minutes.

Process concerns were raised by property owners (and their attorneys) west of Highway 99S who wanted their land to be included within the UGB and designated for commercial use. The property owners actively participated in duly noted Planning Commission and City Council work sessions and public hearings held before the Planning Commission and Council in May and June of 2009.. Information and updated reports requested by property owners and their attorneys was provided in a timely manner. As noted under Goal 2, comments from "Westsider" property owners and their attorneys were considered and resulted in changes to the City's Customized Periodic Review work program. The City did not, however, make changes to basic assumptions and methods in the EOA to achieve a specific result, as requested by property owners and their attorneys.

In conclusion, the City's public and agency review process complies with Goal 1.

Goal 2 Land Use Planning

Goal 2 (Land Use Planning) outlines the basic procedures of Oregon's statewide planning program, stating that land use decisions must be made in accordance with comprehensive plans and that effective implementation ordinances must be adopted. In the process of developing the EOA, the City has inventoried existing employment land uses, projected suitable land needs by land use classifications, and compared these needs with potentially suitable land

within the Junction City urban growth area. The resolution of land need and supply is found in the *Junction City EOA* and in the revised *Junction City Comprehensive Plan* (2009).

Goal 2 also requires the consideration of alternatives.

- The CCPC considered a range of alternatives in developing the EOA:
- The Oregon Department of Corrections considered alternatives for the State Prison and Hospital through an open, statewide process.
- Alternatives for the siting of Grain Millers were considered in Attachment 4.
- The suitable lands inventory was amended in part due to comments from Westsider property owners related to wetland protection.
- City staff developed an Option 2 that postponed final determination regarding the potential to meet commercial land needs within the UGB until residential land need and supply issues are addressed in Phase 2 of the Customized Periodic Review process.
- The EOA was amended to take into account comments from “Westsider” property owners and their attorneys – as well as Option 2.
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Oregon

Theodore R. Kulongoski, Governor

Exhibit B.3

Oregon Department of Transportation
Region 2, Area 5
644 "A" Street
Springfield, OR 97477

Telephone: (541) 747-1354

FAX: (541) 744-8080

June 11, 2009

Kay Bork, Planning Director
City of Junction City
P.O. Box 250
Junction City, OR 97448

E-mail: Savannah.Crawford@odot.state.or.us

Re: **Comprehensive Plan and Zoning Ordinance Amendments, File No. CPA-09-1**

Dear Ms. Bork,

This letter responds to recommendations outlined in the Economic Opportunities Analysis (EOA) and subsequent comprehensive plan and zoning ordinance amendments (File No. CPA-09-1). After review of subject application, the Oregon Department of Transportation (ODOT) appreciates the opportunity to provide comment for the record in relation to the following EOA recommendations:

- 1) Urban Growth Boundary (UGB) expansion to incorporate the State of Oregon correctional facility (Map 16-04-20-00, Tax Lots 1400, 1500, 1600, 2700, 2800, 2900) and Grain Millers site (Map 16-04-29-00, Tax Lots 200, 300, 400, 1800, 1900) into the southern limits of the Junction City UGB; and
- 2) Comprehensive Plan and Zoning Ordinance amendment to redesignate approximately 84 acres of Oaklea site (Map 15-04-31-00, Tax Lots 2400, 2500) from Professional Technical (PT) to Business Park (BP).

Urban Growth Boundary Expansion – State of Oregon Correctional Facility and Grain Millers Site

ODOT does not oppose the EOA recommendation to incorporate the State of Oregon correctional facility and Grain Millers sites into the southern limits of the Junction City UGB. These sites will be designated as 'Industrial' under the Junction City Comprehensive Plan. As the EOA outlines, both sites require specific needs that are not readily available within the existing Junction City UGB or cannot be accommodated through other UGB expansions. These needs include, but are not limited to, large vacant parcels, direct rail access, and direct access to a freight corridor.

ODOT's primary concern lies within the requirements of the Transportation Planning Rule (TPR) (OAR 660-012-0060), which implements Statewide Planning Goal 12 - Transportation. Generally, comprehensive plan amendments, such as a UGB expansion, would initiate a TPR analysis. The TPR states that amendments to acknowledged comprehensive plans and land use regulations which significantly affect a transportation facility shall assure allowed uses are consistent with the identified function, capacity and performance standards of the facility. If consistency cannot be met, the applicant is required to mitigate transportation impacts as approved by ODOT. The TPR analysis is generally vetted through an ODOT-scoped and approved Transportation Impact Analysis (TIA).

However, the City chose to apply Division 24: Urban Growth Boundaries (OAR 660-024-0020(1)(d)), which states:

"The transportation planning rule requirements under OAR 660-012-0060 need not be applied to a UGB amendment if the land added to the UGB is zoned as urbanizable land, either by retaining the zoning that was

assigned prior to inclusion in the boundary or by assigning interim zoning that does not allow development that would generate more vehicle trips than development allowed by the zoning assigned prior to inclusion in the boundary.”

ODOT has received and approved a TPR compliant TIA from the Department of Corrections (DOC) for the State of Oregon correctional facility and hospital site. ODOT and the DOC are in discussion to mitigate the significant affect on ODOT facilities per the TPR. When mitigation negotiations are complete and roadway improvements constructed, the TPR will be satisfied. Since the DOC did submit an ODOT scoped and approved TPR compliant TIA, the Division 24 deferral is unnecessary and ODOT will not require a TIA upon annexation and/or zone change assuming the proposal remains the same as outlined in their approved TIA. ODOT will keep the City comprised of these discussions.

ODOT has not received a TPR compliant TIA from Grain Millers. However, the City is only pursuing a UGB expansion for this property and will not pursue a zone change at this time, thus meeting the TPR deferral under Division 24. The associated parcels will remain County zoned until annexation and zone change occur. ODOT concurs with the City's request to apply Division 24, per the recommendations and Conditions of Approval listed below.

ODOT Recommendation

In relation to UGB expansions, Division 24 permits TPR analysis deferral until an application for annexation and zone change occur. To satisfy TPR requirements upon annexation and zone change, ODOT recommends the City adopt the following Conditions of Approval for the Grain Millers UGB expansion as part of this application:

Condition of Approval #1 – “Prior to approval of annexation and/or zone change of subject property, applicant shall prepare an ODOT scoped and approved Traffic Impact Analysis and comply with provisions of the Transportation Planning Rule (OAR 660-012-0060).”

Condition of Approval #2 – “If analysis indicates significant affect per the Transportation Planning Rule (OAR 660-012-0060), applicant shall mitigate associated traffic impacts, as permitted and approved by the Oregon Department of Transportation.”

Oaklea Site Comprehensive Plan and Zoning Ordinance Amendment

The City proposes to redesignate and rezone the Oaklea site, approximately 84 acres in total size, from Professional Technical (PT) to Business Park (BP). This requires a Comprehensive Plan amendment and zone change, thus initiating requirements of the TPR. Since this comprehensive plan amendment is not associated with a UGB expansion, the TPR analysis cannot be deferred per Division 24.

ODOT's May 18th, 2009 letter suggested the City postpone redesignating/rezoning the Oaklea site until the transportation analysis is vetted through the upcoming Transportation System Plan update. However, due to the nature of the application, and desire to adopt the EOA, comprehensive plan, and zone change amendments through one process, the City agreed to implement a trip cap on the property to satisfy TPR requirements. By imposing a trip cap, any development which occurs on site under the BP zone, cannot generate any additional traffic than allowed under the 'reasonable worst case scenario' in the PT zone.

For trip cap assumptions, ODOT proposes the trip cap based on 84 acres of PT, categorized as 'Industrial Park' in the Institute of Transportation Engineers Trip Generation Manual, eighth edition. The industrial park category was assumed for the PT zone in the 2001 Traffic Impact Analysis for the Oaklea property redesignation and rezone application.

ODOT concurs with the City's implementation of a trip cap to meet the provisions of the TPR, per the recommendations and Conditions of Approval listed below.

ODOT Recommendation

To comply with the Transportation Planning Rule (OAR 660-012-0060) requirements of 'no significant affect' the City will implement a trip cap on subject property and adopt the following Conditions of Approval:

Condition of Approval #1 – “The total acreage of Oaklea Site zoned ‘Business Park’ shall not generate more than 743 PM Peak Hour vehicle trips. Any approved master plan for Oaklea site shall include an ODOT scoped and approved Traffic Impact Analysis to ensure traffic impacts by proposed master plan do not exceed 743 PM peak hour vehicle trips (total of entering and exiting PM peak hour trips).

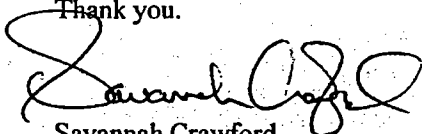
Condition of Approval #2 – “The trip cap shall sunset upon satisfying one of the three following conditions: 1) the applicant prepare an ODOT approved TPR compliant Traffic Impact Analysis, demonstrating no significant affect will occur from reasonable worst case scenario under the Business Park zone compared to reasonable worst case scenario under the Professional Technical zone; or 2) if a significant affect will occur, the applicant shall mitigate any associated traffic impacts as approved by ODOT; or 3) a Transportation System Plan update is complete and adopted by the City.”

Summary

With inclusion of the conditions of approval referenced above, ODOT supports the EOA adoption, comprehensive plan amendments, and zoning ordinance amendments.

We appreciate the opportunity to comment on this application and immense cooperation provided by the City. If you have any questions regarding items discussed in this letter, please contact me at 541-747-1354.

Thank you.



Savannah Crawford
ODOT Area 5 Planner

cc: David Clyne, Junction City City Administrator
Erik Havig, ODOT Region 2 Planning Manager
Sonny Chickering, ODOT Area 5 Manager
Dennis Santos, Area 5 Development Review Coordinator