Appendix C

Junction City Comprehensive Plan and UGB Amendment

Justification and Findings Report

Junction City
680 Greenwood/PO Box 250
Junction City, Oregon 97448

Adopted by the Junction City Council on
September 18, 2012 – Ordinance No. 1212

COMPREHENSIVE PLAN TEXT AND MAP (UGB) AMENDMENTS

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

Wetlands

1. Amend Chapter 2 (Environmental Element) of the Junction City Comprehensive Plan to achieve Goal 5 protection for all significant wetlands.
2. Adopt a new Appendix (Appendix II) to the Junction City Comprehensive Plan containing the City's Local Wetland Inventory.
3. Adopt a new Appendix (Appendix IV) containing the analysis of the economic, social, environmental, and energy consequences of conflicts between locally significant wetlands and potential land uses on or near each wetland.
4. Amend the Junction City Comprehensive Land Use Map to identify the location of Open Space/Wetlands to be locally protected under the City's new Wetland Resources Overlay.
5. Amend the Zoning Map to establish a Wetland Resources Overlay District (WRD) to limit conflicts from 9 locally significant wetlands and a portion of an additional locally significant wetland in the City.
6. Repeal Section 17.60 - Stream Corridor and Wetland District (SCWD) of the Junction City Municipal Code and replace with new wetland regulations establishing a Wetland Resources Overlay District (WRD) to limit conflicts from 9 locally significant wetlands and a portion of an additional locally significant wetland in the City.
7. Amend Table 17.150.070: Summary of Development Decisions/Permits of the Junction City Municipal Code to include the permit process information for wetlands.

Commercial

1. Adopt amendments to the Junction City Economic Opportunities Analysis (EOA) and Economic Development Strategy (EDS) as Appendix III to the Junction City Comprehensive Plan.

2. Amend Chapter 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Development) of the Junction City Comprehensive Plan to carry out the direction found in the EOA and EDS and to remove outdated and irrelevant material.

Parkland

1. Amend Chapter 8 (Parks, Recreation and Cultural Preservation Element) of the Junction City Comprehensive Plan to reference the Parks and Open Space Master Plan, specifically entitled "The Parks and Paths of Junction City" and to remove outdated and irrelevant material.

Housing

1. Adopt a new Goal 10 Housing Element as part of the Junction City Comprehensive Plan.
2. Adopt a new Appendix (Appendix I) to the Junction City Comprehensive Plan containing the City's Residential Buildable Lands Inventory.
3. Amend the Junction City Comprehensive Land Use Map to:
    - Establish three different residential densities (Low, Medium, and High) consistent with existing zoning and the Housing Needs Analysis (see new MDR Designation and new HDR Designation on Map S- 1),
    - Redesignate land from Low Density Residential to Medium Density Residential (see LDR to MDR re-designation on Map S- 1), and
    - Redesignate properties from Professional/Technical to a combination of Low, Medium, and High Density Residential (see PT to Res. Re-Designation on Map S- 1). The proposal would include one acre of High Density Residential (R-3 zoning), 9 acres of Medium Density Residential (R-2 zoning), with the remaining acreage to be developed as Low Density Residential (R-1 zoning).
4. Adopt amendments to the Junction City Comprehensive Plan map to expand the urban growth boundary and designate those lands Medium Density Residential (see Attachment MDR Expansion Areas on Map S- 1).
5. Adopt amendments to the Zoning Map of Junction City to rezone the Professional Technical site to one acre of R-3 zoning, 9 acres of

R-2 zoning, with the remaining acreage to be developed under R-1 zoning.

Urban Growth Boundary Expansion

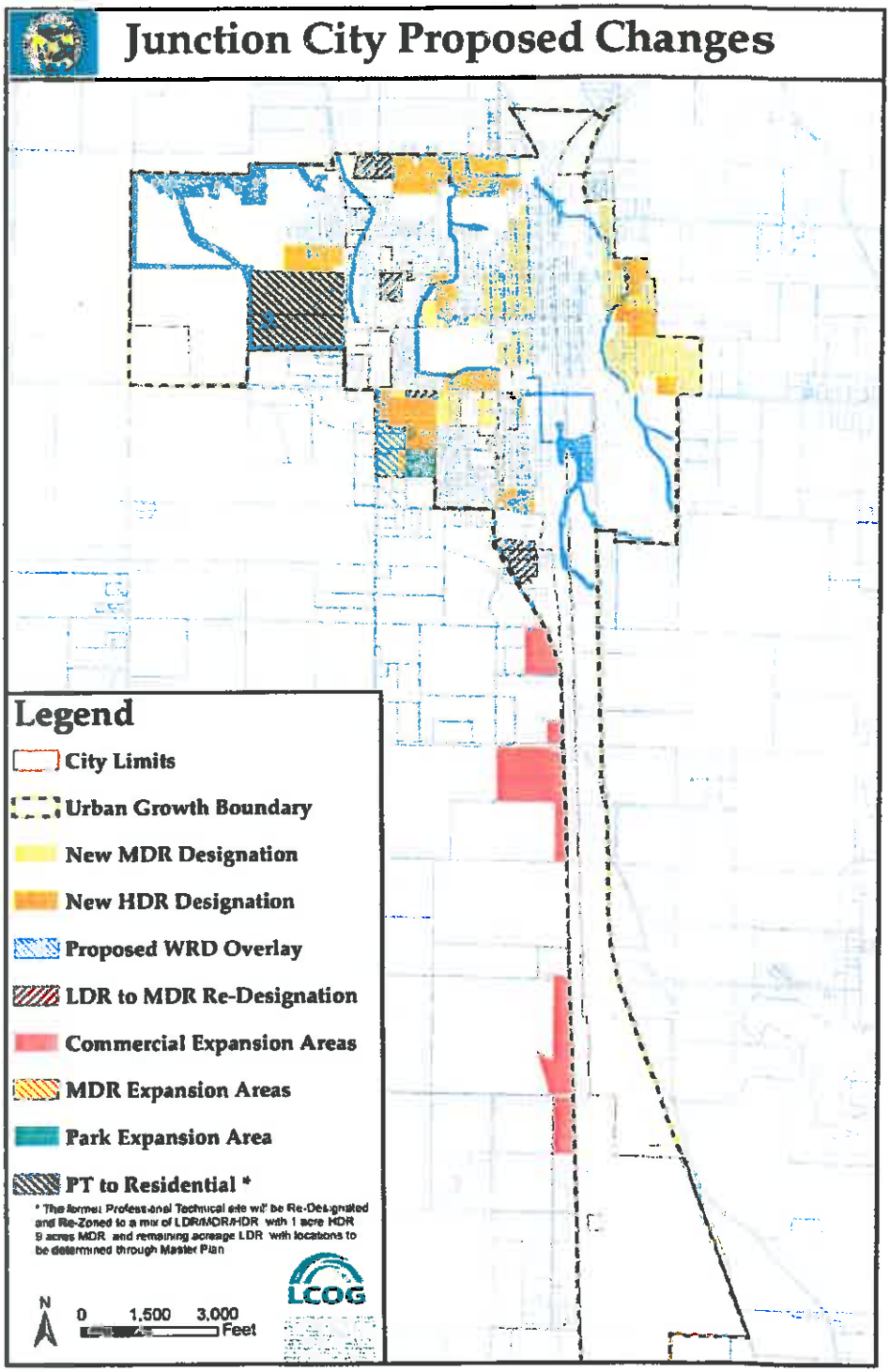
1. Expand the Junction City Urban Growth Boundary (UGB) to meet land needs identified in the EOA and Housing Element for the following uses (see Expansion areas on Map S-1):
   - Residential
   - Parkland
   - Retail and Service Commercial

Note: Rezoning of these parcels will not occur until annexation, at some indefinite point in the future.

Miscellaneous

1. Amend Chapter 3 (Land Use) of the Junction City Comprehensive Plan to update with new information from the Wetlands, Commercial, and Housing analysis and remove outdated and irrelevant material.
2. Repeal the following sections of the Comprehensive Plan, which contain text related to employment projections or residential land supply and land need that have been replaced by the Junction City EOA and Residential Buildable Lands Inventory:
   - Chapter 9: Buildable Lands Inventory (1982)
   - Appendix A: Buildable Land Inventory and Low Income Housing Needs (1982)
   - Goal 14 Urbanization Analysis (3/30/1982)
   - Appendix C: Year 2000 Land Needs Assessment
   - Appendix II (No Name) (1993)

Map S-1. Map showing Proposed Changes



Jurisdiction: City of Junction City. Contact: Stacy Clauson, Planner (Lane Council of Governments) at 541-682-3177. ECONorthwest and Winterbrook Planning provided technical support for this application.

Attachments

Attachment 1:	Proposed Junction City Comprehensive Plan Amendments to Comprehensive Plan Map
Attachment 2:	Proposed Zoning Ordinance Map Amendment
Attachment 3:	DSL Approved Local Wetland Inventory (Report) (new Appendix II to the Comprehensive Plan) and Notice to Property Owners as required under OAR 141-086-0240
Attachment 4:	Goal 5 ESEE Analysis for the Area within the Junction City Urban Growth Boundary (Winterbrook Planning, May 2012) (new Appendix IV to the Comprehensive Plan)
Attachment 5:	Proposed Junction City Comprehensive Plan Amendments to Chapter 2 (Environmental Element)
Attachment 6:	Zoning Ordinance Amendments (Water Resources Overlay District)
Attachment 7:	Letter from Janet Morlan, Wetlands Program Coordinator, Oregon Department of State Lands to Junction City concerning the local wetland inventory
Attachment 8:	Proposed Junction City EOA and EDS (revised Appendix III to the Comprehensive Plan)
Attachment 9:	Proposed Junction City Comprehensive Plan Amendments to Chapter 3 (Land Use)
Attachment 10:	Proposed Junction City Comprehensive Plan Amendments to Chapter 4 (Economic Development)
Attachment 11:	Proposed Residential Buildable Lands Inventory (new Appendix I to the Comprehensive Plan)
Attachment 12:	Proposed Junction Comprehensive Plan Amendment - New Goal 10 Housing Element
Attachment 13:	Proposed Junction City Comprehensive Plan Amendments to Chapter 8 (Parks, Recreational, and Cultural Preservation Element)

Attachment 14: Existing Parks and Paths of Junction City Plan

Attachment 15: 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 16: Proposed Sections to be repealed from the Comprehensive Plan, as follows:

- Chapter 9, Buildable Lands Inventory (1982)
- Appendix A, Buildable Land Inventory and Low Income Housing Needs (1982)
- Goal 14 Urbanization Analysis (3/30/1982)
- Appendix C: Year 2000 Land Needs Assessment
- Appendix II

Attachment 17: City of Junction City Urban Growth Management Agreement

Table of Contents

SECTION 1:INTRODUCTION 1

Background 1

Applicable Statewide Planning Policy 2

Organization of this document 8

SECTION 2:COMMUNITY DEVELOPMENT VISION 9

SECTION 3:WETLANDS 13

Local Wetland Inventory 13

Wetland Protection Program 16

Buildable Lands Affected by Goal 5 Measures 22

SECTION 4 LAND NEED 24

Need Factor 1: Population Growth 24

Need Factor 2: Land Need 25

SECTION 5: ALTERNATIVES ANALYSIS 52

Commercial 52

Park land 108

Residential land 114

SECTION 6: GOAL 14 LOCATIONAL FACTORS 120

Commercial 120

Parkland 128

Residential 130

Conclusion 135

SECTION 7: STATEWIDE GOAL CONSISTENCY ANALYSIS 138

Goal 1 Citizen Involvement 138

Goal 2 Land Use Planning 139

Goals 3 Agricultural Lands and 4 Forest Lands 139

Goal 5 Open Spaces, Scenic and Historic Areas & Natural Resources 140

Goal 6 Air, Water and Land Resources Quality 140

Goal 7 Areas Subject to Natural Disasters and Hazards 141

Goal 8 Recreation Needs 141

Goal 9 Economy of the State 141
Goal 10 Housing 142
Goal 11 Public Facilities and Services 142
Goal 12 Transportation 142
Goal 13 Energy 144
Goal 14 Urbanization 149
Goal 15 through 19 149
Conclusion 150

Section 1 Introduction

This report presents the justification and findings in support of Phase II of the Junction City Urban Growth Boundary (UGB) review. Phase I addressed industrial and institutional lands; Phase II addresses residential (including parks) and commercial lands. The UGB expansion proposal presented in this report is the result of a year-long effort by the Junction City Citizen Comprehensive Planning Committee (CCPC) and reflects input from the CCPC as well as through a community visioning process conducted in 2010.

BACKGROUND

In 2009, Junction City entered into a "customized" periodic review of its comprehensive plan. Periodic review is a process through which local governments evaluate and update the comprehensive land use plan and implementing ordinances. For Junction City, the focus of periodic review is on planning to accommodate growth expected from two major state facilities and achieving its economic development objectives.

Phase I of the project was completed in 2009 and included a UGB expansion to accommodate three types of land uses with specific siting requirements: the State Prison and Hospital site, the Grain Millers site, and the Junction City wastewater treatment plant site. In summary, Phase I addressed land needs for industrial and institutional employment opportunities and key infrastructure needed to support those uses.

Phase I materials were accepted by DLCD and approved by the Director, under the provisions of OAR 660-025-0130 and OAR 660-025-0150(5). As such, this document and the land need established within it is acknowledged. The City does not propose to reopen issues related to the employment land need as part of Phase II, as provided for under OAR 660-25-0140(5). Instead, the City plans to focus on the UGB sufficiency analysis for residential and commercial uses, which was deferred to Phase II of the project.

Phase II focused on residential and commercial lands. Phase II began with a community visioning process that resulted in a refined community development vision. The CCPC then spent many meetings providing guidance with respect to how the City should best achieve the community vision in a manner that complies with state land use policy. The UGB proposal presented in this report is the result of that effort.

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 2012.

- 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.

  The Phase I findings supported 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 prepared a Housing Needs Analysis, finalized the Local Wetlands Inventory (including the ESEE Analysis and Goal 5 Program), updated its buildable lands inventory, and made refinements to the Economic Opportunities Analysis. This information provides the foundation used to determine residential and commercial land needs. Residential and commercial land needs are 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.

APPLICABLE STATEWIDE PLANNING POLICY

GOAL 5 REQUIREMENTS

The Junction City Local Wetland Inventory and Wetland Protection Program meet the requirements of the Goal 5 administrative rule (OAR 660-023). The Junction City Local Wetland Inventory and Wetland Protection Program:

- Complies with the requirements for a Local Wetland Inventory established in OAR 141-86-0180 through 0240.

- Fulfills the wetlands inventory requirements for Goal 5 (OAR 660-015 and 660-023).
- Identifies the "impact areas" around the wetlands, as well as the conflicting uses—any land uses or activities in the "impact area" that, if allowed, "could adversely affect" a wetland.
- Considers the relationships between each wetland and the economic, social, environmental, and energy consequences of allowing, prohibiting, or limiting conflicting uses on each wetland pursuant to OAR 660-023-0010.
- Determines how to protect each wetland - full, limited, or no local protection, based upon the provisions established in OAR 660-023-0040.
- Adopts comprehensive plan provisions and land use regulations to implement the decisions made pursuant to OAR 660-023-0040(5).
- Provides additional buildable lands to offset the reduction in the developable land supply for wetlands that are protected locally, under the provisions of OAR 660-23-070.

GOAL 9 REQUIREMENTS

The Junction City Economic Opportunities Analysis prepared by ECONorthwest meets the requirements of the Goal 9 administrative rule (OAR 660-009). The Junction City EOA:

- Considers local, regional, state and national economic trends (OAR 660-009-0015(1));
- Articulates Junction City's comparative economic advantages (OAR 660-009-0015(4);
- Identifies commercial, industrial and public employment opportunities and the site characteristics required for targeted industrial firms and public institutions (OAR 660-009-0015(4);
- Documents opportunities and takes steps to increase land use efficiency within the UGB (OAR 660-024-0050);
- Compares documented site needs with the availability of sites within the existing Junction City UGB (OAR 660-009-0025); and
- Includes a detailed economic development strategy to meet locally defined economic objectives (OAR 660-009-0020).

GOAL 10 REQUIREMENTS

The Housing Needs Analysis prepared by ECONorthwest meets the requirements of the Goal 10 administrative rule (OAR 660-008) as well as

applicable safe harbor sections of the Goal 14 administrative rule (OAR 660-024). The Junction City Housing Element and proposed UGB expansion:

- Inventory buildable residential land, including development constraints (OAR 660-008-0005(2));
- Allocate sufficient residential land for needed housing types (OAR 660-008-0010); and
- Apply specific plan designations to residential consistent with identified housing needs (OAR 660-008-0020).

STATE REQUIREMENTS FOR UGB AMENDMENTS

Goal 14 must be read together with ORS 197.298 priorities for urban growth boundary expansion and the Goal 14 administrative rule (OAR Chapter 660, Division 024) when local governments consider amending a UGB.

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.

Amendments to UGBs are designed to provide a 20-year land supply based on criteria set forth in the Goal 9 rule (Division 009) for employment land and the Goal 10 rule (Division 008) for residential land. Goal 14 and its administrative rule (Division 024) provide greater specificity regarding how to determine whether there is sufficient land within a UGB to meet 20-year land need.

Once need has been determined, local governments must evaluate whether the existing UGB has sufficient capacity to meet this need. If not, a UGB amendment can be justified. However, not all land is "suitable" for employment use or "buildable" for residential purposes. Goal 14 and its rule encourage local governments to specify site suitability criteria when assessing the capacity of vacant, partially vacant and redevelopable land to meet identified employment needs. If land is unsuitable for employment purposes, it does not need to be considered further in the

employment UGB capacity analysis; if land is unbuildable for residential purposes (as defined in Division 008) it does not need to be considered further in the UGB capacity analysis.

Goal 14 Need Criteria

Goal 14 notes that "establishment and change of urban growth boundaries shall be based on the following:

1. Demonstrated need to accommodate long range urban population growth, consistent with a 20-year population forecast coordinated with affected local governments. [As noted above, the Goal 10 rule provides direction regarding how to determine residential land need.]
2. Demonstrated need for housing, employment opportunities, livability or uses such as public facilities, streets and roads, schools, parks or open space; [As noted above, the Goal 9 rule provides direction regarding how to determine employment land need.]

However, "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."

While this provision is most useful for determining the site characteristics needed by target employment opportunities; it also has utility for determining the siting characteristics for parks.

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."*

This provision has little relevance for residential land – where only "buildable" land is required under the Goal 10 administrative rule (OAR 660-008-0005) but may have application to parkland which may have more demanding site suitability needs.

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.

This determination requires a careful analysis of the capacity of suitable employment land supply within the UGB to meet 20-year land need, and of the buildable residential land supply within the existing UGB to meet identified housing and public land needs.

ORS 197.298 Requirements and Goal 14 Location Factors

If there is a documented deficit of land within the UGB then a UGB amendment can be justified. As noted in Goal 14, the location of the urban growth boundary and changes to the boundary shall be determined by evaluating alternative boundary locations consistent with ORS 197.298 and with consideration of the following factors:

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 urban growth boundary.

As noted above, Goal 14 allows local governments to 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.*

ORS 197.298 establishes the following priorities for inclusion of land within an expanded UGB:

> ***197.298 Priority of land to be included within urban growth boundary.*** *(1) In addition to any requirements established by rule addressing urbanization, land may not be included within an urban growth boundary except under the following priorities:*
>
> > *(a) First priority is land that is designated urban reserve land under ORS 195.145, rule or metropolitan service district action plan.*

(b) If land under paragraph (a) of this subsection is inadequate to accommodate the amount of land needed, second priority is land adjacent to an urban growth boundary that is identified in an acknowledged comprehensive plan as an exception area or nonresource land. Second priority may include resource land that is completely surrounded by exception areas unless such resource land is high-value farmland as described in ORS 215.710.

(c) If land under paragraphs (a) and (b) of this subsection is inadequate to accommodate the amount of land needed, third priority is land designated as marginal land pursuant to ORS 197.247.

(d) If land under paragraphs (a) to (c) of this subsection is inadequate to accommodate the amount of land needed, fourth priority is land designated in an acknowledged comprehensive plan for agriculture or forestry, or both.

(2) Higher priority shall be given to land of lower capability as measured by the capability classification system or by cubic foot site class, whichever is appropriate for the current use.

(3) Land of lower priority under subsection (1) of this section may be included in an urban growth boundary if land of higher priority is found to be inadequate to accommodate the amount of land estimated in subsection (1) of this section for one or more of the following reasons:

(a) Specific types of identified land needs cannot be reasonably accommodated on higher priority lands;

(b) Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or

(c) Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.

Note that Junction City has not established urban reserve areas and therefore has no priority 1 land to review.

As explained in the Goal 14 rule,

660-024-0060 Boundary Location Alternatives Analysis

(1) When considering a UGB amendment, a local government must determine which land to add by evaluating alternative boundary locations. This determination must be consistent with the priority of land specified in ORS 197.298 and the boundary location factors of Goal 14, as follows:

(a) Beginning with the highest priority of land available, a local government must determine which land in that priority is suitable to accommodate the need deficiency determined under OAR 660-024-0050.

(b) If the amount of suitable land in the first priority category exceeds the amount necessary to satisfy the need deficiency, a local government must apply the location factors of Goal 14 to choose which land in that priority to include in the UGB.

(c) If the amount of suitable land in the first priority category is not adequate to satisfy the identified need deficiency, a local government must determine which land in the next priority is suitable to accommodate the remaining need, and proceed using the same method specified in subsections (a) and (b) of this section until the land need is accommodated.

(d) Notwithstanding subsection (a) to (c) of this section, a local government may consider land of lower priority as specified in ORS 197.298(3).

(e) For purposes of this rule, the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under section (5) of this rule, as well as other provisions of law applicable in determining whether land is buildable or suitable.

ORGANIZATION OF THIS DOCUMENT

The remainder of this document is organized as follows:

Section II: Community Vision describes the community development vision for Junction City based on community input.

Section III: Wetlands presents findings related to the City's Goal 5 compliance for wetlands, including a local wetland inventory and wetlands protection program.

Section IV: Land Need presents a summary of land needs from the technical analysis that supported the UGB expansion proposal.

Section V: Alternatives Analysis presents findings related to the alternatives analysis required by OAR 660-024-0060 as well as findings related to the four Goal 14 factors

Section VI: Goal 14 Locational Factors includes additional findings demonstrating compliance with ORS 197.298 priorities and Goal 14 locational factors.

Section VII: Statewide Goal Consistency Analysis presents findings that demonstrate that the proposed UGB concept complies with applicable state planning requirements. The justification includes an Alternatives Analysis as required by OAR 660-024-0060.

Section 2 Community Development Vision

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.

Junction City's community development vision builds from the economic opportunities that are described in the Junction City EOA and economic development strategy as well as Chapter 3 of the Junction City Comprehensive Plan. Broadly, the vision articulates the city's desire to become a **complete community**. In short, the vision is for Junction City to be a community that has opportunities for people to live, work, and play. Functionally, that means that the City have:

- Adequate land for the commercial uses that Junction City will need as the City grows, including providing commercial land to serve neighborhoods and businesses on the southern side of Junction City and in the surrounding rural communities that rely upon Junction City for their day-to-day service needs
- Adequate employment opportunities that sustain the population and maintain a population/employment ratio that does not result in Junction City being a "bedroom community" to the major employment centers in Lane County;
- A range of shopping and services available to meet most everyday needs of Junction City residents, together with those nearby smaller communities and rural areas, such as (but not limited to) a full-service grocery stores, department store, home improvement store, other large format retail stores, personal services (e.g., a branch bank or beauty salon), restaurants;
- Recreational and entertainment facilities and activities that make Junction City an attractive place to live and work, such as a performing arts theater and movie theater;
- Medical services and other professional services for residents;
- Business support services for the State facilities;
- Services for visitors, such as hotels, a conference center, or a large Recreational-Vehicle Park;
- Opportunities for development of agri-businesses related to local agricultural products, such as wine, grass seed, blueberries, or services for agri-businesses;

- A downtown that is vibrant and vital to the community;
- Housing that is safe and affordable for Junction City residents at all income levels; and
- Public facilities and services that support the community's vision.

The City envisions having a hierarchy of commercial sites to provide opportunities for the uses described above. Junction City will require some relatively small sites in downtown, residential neighborhoods, and along Highway 99, to accommodate demand from businesses with those specific size and location needs. The relatively small-scale commercial uses along Highway 99 are those businesses located south of the City that already serve the City. Junction City will also require a sub-regional commercial center to provide opportunity for commercial business that need to locate in a commercial center or have special siting requirements (e.g., direct access to major transportation corridors or high visibility sites) can locate. The need for this range of sites and the characteristics of different types of sites is described in the EOA.

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;
- Provide a site for a sub-regional commercial center of approximately 35 acres in the southern part of Junction City;
- 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.

As part of the Phase II process, the CCPC articulated the community vision related to commercial uses. This vision identifies three priorities for commercial uses:

- **Sub-Regional Commercial Center.** One of the core community and economic development objectives for Junction City is to provide opportunities for retail and service expansion to capture local and sub-regional leakage, serve anticipated growth of this sub-regional market area, and provide employment opportunities for Junction

City residents. In its economic development vision, the City identified the objective of creating a mixed-use sub-regional commercial center as part of creating a complete city with opportunities where residents can work, shop, play, and live.

The Junction City Economic Opportunities Analysis forecasts 1,044 new jobs in the commercial sector. Moreover, the City identifies new employment related to the capture of sales from regional markets to the west (Cheshire and Triangle Lake) and north as an economic opportunity. The City's strategy for capitalizing on this opportunity is to encourage the development of a sub-regional commercial center.

Consistent with the community and economic development vision, a sub-regional commercial center would accommodate a mixture of businesses such as a grocery store, a dry goods/drug store, a home improvement store, a general merchandise store, agri-businesses (e.g., wine tasking room) a hotel, an RV park, conference center, businesses providing entertainment and recreation (e.g., a theater or movie theater), medical services, personal services (e.g., a branch bank or beauty salon), restaurants, a service station, as well as offices with professional services. These types of businesses typically require larger sites (generally those larger than two acres) or need to locate in a commercial center.

Some of the businesses in Junction City's target industries include businesses that would locate in a master-planned commercial center, rather than in downtown, such as a grocery store or large-format retailer, as well as smaller businesses that prefer a commercial center location. Some service businesses, such as medical or personal services, will need to locate in a newly developed commercial center with other services. In addition, some businesses—such as those providing overnight accommodations and social assistance to people and families associated with the State facilities—will need to locate near the State facilities.

- **Downtown and small commercial sites.** Meet specialized retail and service uses in Junction City's downtown and on other small commercial sites.
    - Downtown will accommodate commercial uses in Junction City through providing small-scale sites (generally those smaller than two acres), and through infill or redevelopment of existing sites as suitable sites become available. The types of commercial businesses likely to locate on infill and

redevelopment sites in Junction City's downtown are small, boutique retail businesses or other small businesses.

- Commercial demand will also be met on small commercial sites, both those within the Junction City UGB and in proposed expansion areas south of the City core. These small commercial sites will provide opportunities for small businesses that require smaller and typically stand-alone business sites outside of downtown and outside of a commercial center.

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.

Section 3

Wetlands

This section summarizes the City of Junction City's response to Statewide Planning Goal 5 related to wetlands protection, a task outlined in the City's Periodic Work program.

The Oregon Administrative Rules 660, Division 23, outlines the State's procedures and requirements for complying with Statewide Planning Goal 5. The objective of Goal 5 is to "protect natural resources and conserve scenic, historic, and open space resources for present and future generations." As part of the City of Junction City's periodic review work program requirements established by the DLCD, the City was required to inventory and establish protection programs for the City of Junction City's significant wetlands.

Oregon State Land Use Planning Goal 5 directs local governments to protect significant wetlands from urban impacts. Significant wetlands must be identified using criteria adopted by the DSL and programs to protect significant wetlands must be developed.

Local Wetland Inventory

A Local Wetland Inventory (LWI) is a systematic survey of an area (usually a city) to locate, map and describe the wetlands. The inventory is prepared using information sources such as aerial photos and soils maps and by conducting field observations. Where needed and where property access is permitted, the wetland scientists collect data on the vegetation and soils to confirm that an area is or is not a wetland. The final LWI consists of a set of maps that show the location of wetlands and streams, and descriptive information about the wetlands and the main functions they provide. Functions that are evaluated include wildlife habitat quality, contribution to fish habitat or water quality improvement, and floodwater retention capability.

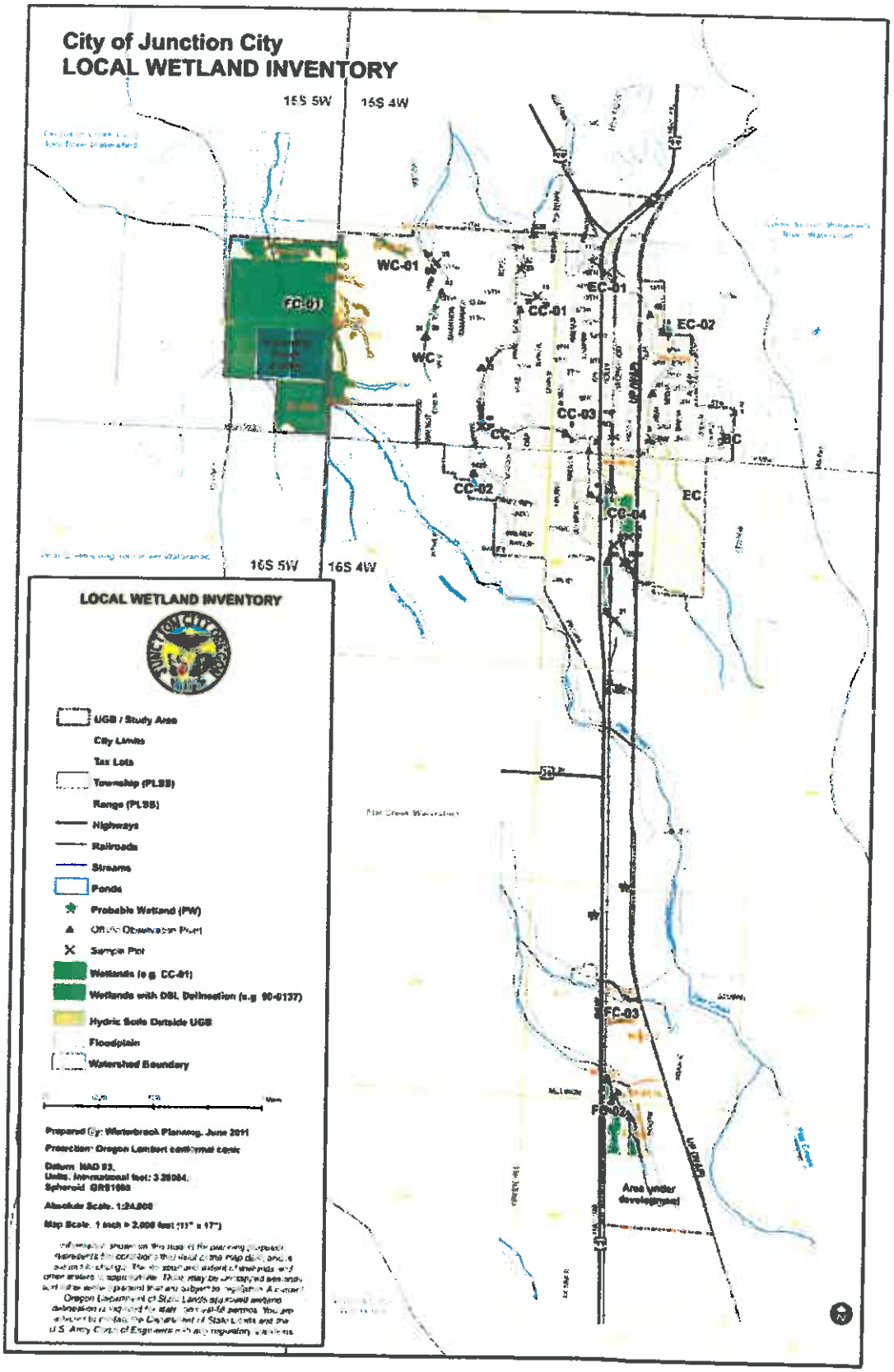
Oregon State has established LWI requirements in OAR 141-86-0180 through 0240. An LWI fulfills the wetlands inventory requirements for Goal 5 and Goal 17 (OAR 660-015 and 660-023).

The City of Junction City, through a grant from the Oregon Department of Land Conservation and Development, retained a consultant team led by Winterbrook Planning to conduct an LWI within the City's Urban Growth Boundary (UGB). The LWI provides a summary of LWI methods and findings, together with wetland inventory maps.

The LWI identified a total of 14 wetlands within the study area (the City's UGB). Of these 14 wetlands, four were channels constructed or modified to address stormwater and flood management issues. Wetlands within Junction City range from one-half to 214 acres in size, with a combined area of 265.64 acres. In addition to these wetlands, the LWI identifies eight "probable wetlands" of less than one-half acre in size (see Map 3-1).

Winterbrook evaluated the wetlands to determine whether any met the criteria for Wetlands of Special Interest for Protection. None of the wetlands evaluated in this LWI met those criteria. Winterbrook evaluated inventoried wetlands against the state's criteria for Locally Significant Wetlands (LSW) and found that 13 of the wetlands met the criteria (OAR 141-086-0350). Three of the flood management channels qualified as LSWs based on their "hydrological control" function.

Map 3-1. Local Wetland Inventory Map



LWI Review and Approval Process (OAR 141-086-0228)

On December 16, 2011, the Oregon Department of State Lands notified the City of Junction City that the DSL had approved the City's LWI and assessment.

Prior to approval by the Department of State Lands (DSL), a draft of the LWI was provided to the Department for review. In addition, the City of Junction City provided opportunity for public review and comment on draft LWI products, through the following mechanisms:

- Holding a workshop for affected property owners and the public to learn about the Local Wetland Inventory process.
- Sending copies of the draft inventory report and map showing wetlands to affected property owners for review.
- Conducting a review of the draft inventory and map with the Citizen Comprehensive Planning Committee at a public meeting, to which affected property owners were invited by mailed notice to attend.

After receiving approval of the LWI from DSL, the City of Junction City mailed notice within one hundred twenty (120) calendar days to all owners whose parcel contains or abuts a mapped wetland or probably wetland. Notices were sent to over 200 property owners. A copy of the landowner notification letter was sent to DSL, consistent with the requirements established in OAR 141-086-0240. The notice also indicated that the City would be developing a wetland protection program and encouraged property owners to participate in this process, consistent with OAR 660-023-0060 (see Attachment 3).

WETLAND PROTECTION PROGRAM

OAR 660-023-0050 (1) directs local governments to adopt comprehensive plan provisions and land use regulations to achieve Goal 5 protection for all significant wetlands.

Local governments may meet these Goal 5 requirements by developing a program using either the standard process (OAR 660-023-0030 through 660-023-0050) or the safe harbor provision 660-023-0100(4)(b). After discussion and review, the City of Junction City opted to use the standard process (OAR 660-023-0030 through 660-023-0050).

Under the Standard Approach, the Goal 5 and related Oregon Administrative Rules establish a five step planning process:

1. Inventory local resources listed in Goal 5 and decide which ones are significant
2. Identify potential land uses on or near each wetland and any conflicts that might result
3. Analyze the economic, social, environmental, and energy consequences of such conflicts
4. Decide whether to allow, limit, or prohibit identified conflicting uses for significant resource sites; and
5. Adopt measures such as zoning, development regulations to put that policy into effect.

Junction City has complied with Goal 5 and the related administrative rules concerning wetlands protection through the following steps:

Step One: The City has completed a Local Wetland Inventory, which has been approved by the Department of State Lands (see Attachment 3). The local wetland inventory found that the city has 13 wetlands that meet the definition of locally significant (see Map 3-1 for a map of the wetlands). These are the wetlands that need to be considered for Steps 2-5.

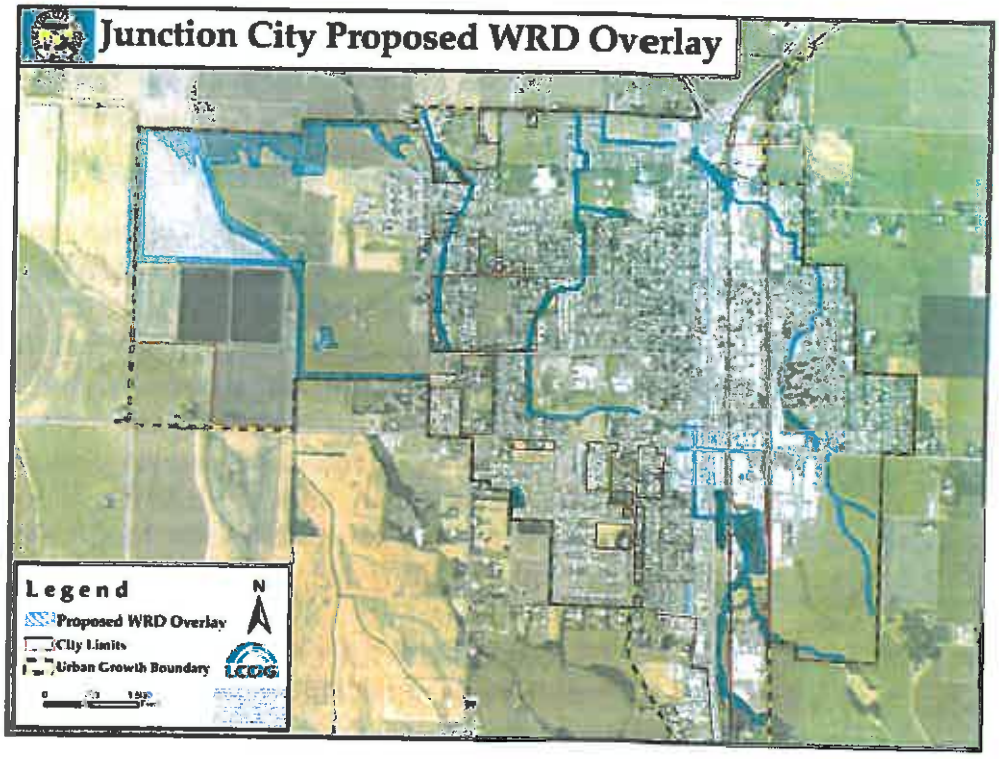
Step Two: Winterbrook Planning has completed an ESEE analysis (see Attachment 4) that identifies conflicting uses and impact area for each wetland.

Step Three: This step is the analysis of the potential Economic, Social, Environmental, and Energy consequences of prohibiting, limiting, or permitting conflicting uses to occur on wetlands that have been determined to be significant. Winterbrook Planning has completed an ESEE analysis containing this analysis (see Attachment 4), which is to be adopted as part of the City of Junction City's Comprehensive Plan.

Step Four: This step requires the City to develop a program to achieve Goal 5 and requires the City to determine whether to allow, limit, or prohibit identified conflicting uses for significant wetland sites, based upon the findings of the ESEE analysis. After considering economic, social, environmental and energy (ESEE) consequences of alternative policy options, the City of Junction City decided to limit conflicting uses for five relatively high quality wetlands (Wetlands CC-01, CC-04, EC-01, EC-02 and FC-01). However, only portions of Wetland FC-01 (Oaklea) that are protected by an existing Open Space plan designation (or by conditions of land use approval) would have these local protections. The remaining wetlands west of Oaklea Road and east of Flat Creek would be

subject only to DSL regulation, in order to recognize previous land use approvals granted to the property, planned infrastructure improvements, and to provide suitable residential land within the existing UGB. In addition, the ESEE analysis concluded that limitations on conflicting uses should be afforded to five relatively low quality wetlands to protect the open water aesthetic and flood control qualities (Wetlands CC, CC-02, EC, WC, and WC-01). Because of identified adverse economic impacts, the 2012 ESEE Analysis recommended relying solely on DSL to review impacts for the remaining three relatively low quality wetlands identified on the Local Wetlands Inventory (Wetlands CC-03, FC-02, and FC-03) (see Map 3-2).

Map 3-2. Junction City Proposed Wetland Resources Overlay District



Step Five: This step requires the City to adopt comprehensive plan provisions and land use regulations to implement the decisions made pursuant to OAR 660-023-0040(5).

The City of Junction City is amending the Comprehensive Plan to include policies addressing wetlands (see Attachment 5). These amendments accomplish the requirements of Goal 5.

OAR 660-023-0050(1) requires that the implementing ordinances clearly identify those conflicting uses that are allowed and the specific standards or limitations that apply to the allowed uses. A program to achieve Goal 5 may include zoning measures that partially or fully allow conflicting uses (see OAR 660-023-0040(5)(b) and (c)).

The City of Junction City has chosen to establish a Wetland Resources Overlay District (WRD) to limit conflicts from 9 locally significant wetlands and a portion of an additional locally significant wetland in the City (see Map 3-2 and Attachment 1, 2, and 6). For the remaining wetlands, the City of Junction City has determined that adverse economic and social consequences of protecting these wetlands from the conflicting uses are so great that they outweigh the environmental benefits of protecting the resource. Development within these wetlands would still be subject to existing state and federal wetland regulations.

For the wetlands that are locally protected, the WRD prohibits most conflicting uses allowed by the Residential, Commercial, Industrial and Public zoning districts. However, Junction City's WRD would allow certain conflicting activities on a limited basis when associated with an exempt, permitted or conditional use, including:

- Maintenance and repair of existing improvements;
- Replacement of existing legal nonconforming structures;
- Replacement of existing vegetation in conjunction with an approved use;
- Implementation of erosion and sedimentation control measures or flood control measures;
- Wetland restoration and rehabilitation activities;

- Construction of a new single family dwelling on a lot legally created prior to the date of adoption of this ordinance (if permitted under the base zoning);
- Planned public utilities and infrastructure;
- Paths and bridges for pedestrians and bicycles;
- Planned public recreational facilities;
- Divisions of property, provided that the lots are designed to accommodate the construction of a permitted use outside of the wetland area; and
- Water dependent uses, such as piers, boat launches and other similar features.

The City of Junction City has determined that the adverse economic and social consequences of protecting locally-significant wetlands from these conflicting uses may outweigh the environmental benefits and therefore have allowed these conflicting uses.

The WRD also allows limited impacts to wetlands in hardship situations through the adjustment or variance process.

These provisions are consistent with the provisions of OAR 660-023-0040(5) and are based upon the findings of the ESEE analysis. As such, the amendments and the Wetland Protection Program are consistent with the provisions established in OAR 60-023-0040.

During the public hearing process, several citizens raised concerns about "takings". Both federal and Oregon law similarly determine regulatory takings claims based upon whether a regulation denies all substantial economically viable, beneficial or productive use of the entire subject property. *Lucas vs. South Carolina Coastal Council*, 505 US 103 (1992); *Penn Central Transportation Co. v. New York City*, 438 US 104 (178); *Coast Range Conifers, LLC v. State*, 339 Or 136 (2005); and *Dodd v. Hood River County*, 115 Or App 139 (1992).

As an initial point, indicating no regulatory takings is effected by the proposed regulations, no property impacted by the WRD is fully regulated—only portions of affected parcels are subject to the regulations. None are rendered unbuildable or developable. As a further safeguard, the proposed Wetland Protection Program includes several mechanisms

to ensure that the City will not denyany property owner all economically viable use of private property, including:

- A hardship provision that allows development of a single-family residence in a zone that permits this use; and
- Variance provisions that allow the wetland protections to be modified in the event the property somehow has been rendered unbuildable.

In addition, the proposed regulations are not requiring a monetary donation or expenditure that results in a public investment on the property.

These provisions, and the limited reach of the URD overlay, together ensure there is no loss of any property's economic viability, or beneficial or productive use. For this reason, there is no further need to evaluate the proposal for regulatory takings.

Conclusion

With the adoption of the proposed LWI and wetland protection program (including an ESEE Analysis, Comprehensive Plan Provisions, and land use regulations) the City has complied with the requirements established in Goal 5.

BUILDABLE LANDS AFFECTED BY GOAL 5 MEASURES

The Goal 5 administrative rule (OAR 660-0023-0070(1)) requires that buildable lands affected by Goal 5 measures must be accounted for at the next periodic review by amending the UGB, re-designating land within the UGB, or both:

> ***Buildable Lands Affected by Goal 5 Measures***
> *(1) If measures to protect significant resource sites inside urban growth boundaries affect the inventory of buildable lands in acknowledged plans required by Goals 9, 10 and 14, a local government outside of the Metro UGB, and Metro inside the Metro UGB, prior to or at the next periodic review, shall: (a) Amend its urban growth boundary to provide additional buildable lands sufficient to compensate for the loss of buildable lands caused by the application of Goal 5;(b) Redesignate other land to replace identified land needs under Goals 9, 10, and 14 provided such action does not take the plan out of compliance with other statewide goals; or (c) Adopt a combination of the actions described in subsections (a) and (b) of this section.*

The Goal 10 administrative rule (OAR 600-008-0005(2)) defines buildable land as follows:

> *"Buildable Land" means residentially designated land within the urban growth boundary, including both vacant and developed land likely to be redeveloped, that is suitable, available and necessary for residential uses. Publicly owned land is generally not considered available for residential uses. Land is generally considered "suitable and available" unless it: (a) Is severely constrained by natural hazards as determined under Statewide Planning Goal 7; (b) Is subject to natural resource protection measures determined under statewide Planning Goals 5, 15, 16, 17, or 18...*

The Junction City BLI prepared by ECONorthwest assumes that locally-significant wetlands that are protected by the City's WRD protected locally significant wetlands (LSW) within the UGB are unbuildable. Thus, the BLI removed locally-protected LSW from the inventory of buildable residential lands and suitable employment lands. The City has accounted for the reduction in the buildable / suitable lands supply resulting from the LWI in one of the three ways identified in OAR 660-023-0070(1), as addressed in Section 4.

Land Need

This section summarizes the residential and commercial land needs for Junction City. The commercial land needs are from the 2009 EOA with modifications to reflect the updated community vision. The park land needs are based on the City's adopted plan: "Parks Master Plan (The Parks and Paths of Junction City: an Integrated Parks, Open Space and Trails Master Plan)." The residential land needs are based on an update to the City's Comprehensive Plan Housing Element.

This section addresses Goal 14 need factors 1 and 2 for commercial, park, and residential lands.

NEED FACTOR 1: POPULATION GROWTH

Goal 14 Need Factor 1 requires cities to demonstrate need to accommodate population growth:

> **Factor 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. Housing needs are a direct function of population growth, and are based on the Lane County population forecast. Moreover, 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. Employment growth is projected to increase most dramatically from 2010-2015, when the prison and hospital projects are scheduled for completion.

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."

Need Factor 1 Conclusion

Residential land need for Junction City is based on Lane County's adopted and coordinated population forecast for Junction City. 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.

NEED FACTOR 2: LAND NEED

Goal 14 Need Factor 2 requires cities demonstrate need for lands proposed for inclusion in a UGB:

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

This section documents land need for housing, parks, and commercial land to be included in the Junction City UGB expansion proposal.

COMMERCIAL LAND NEED

Goal 9 (economy) requires an estimate of the amount of commercial and industrial land that will be needed over the planning period. Demand for commercial and industrial land will be driven by the expansion and relocation of existing businesses and new businesses locating in Junction City, especially development of the State Prison and Hospital. The level of this business expansion activity can be measured by employment growth in Junction City.

Employment Forecast

Table 4-1 shows that Junction City's employment will grow by about 3,345 employees, a 96% increase at a rate of 3.2% annual growth between 2009 and 2029.[1] The employment forecast presented in Table 4-1 assumes that

[1] The employment and land need forecasts in this report are lower than the forecasts in the March 4, 2009 memorandum to the CCPC "Preliminary employment land need for Junction City." The forecasts have been lowered to account for the continuing decline in Lane County's RV industry, which is affecting RV manufacturers, their suppliers, and is likely to affect other businesses in Junction City, such as RV sales companies and businesses that provide services to businesses that depend on the RV industry.

employment in Junction City have several one-time employment changes: (1) Country Coach's employment will decrease to about 100 workers in 2009 (a decrease of about 1,500 jobs)[2] and (2) development of the State Prison and Hospital will add about 1,800 jobs between 2012 and 2014.

Table 4-1. Forecast of employment growth in by building type, Junction City UGB, 2009–2029

	2009		2029		Change 2009 to 2029
Building Type	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: Junction City Economic Opportunities Analysis, Table 5-4
Note: Blue shading denotes assumptions

The EOA makes assumptions about land use efficiencies related to two categories of employment: employment that locates in residential zones, and employment that requires no new land. The second category relates to infill and redevelopment. Table 4-2 makes two assumptions that decrease land needed for new employment:

- **Some employment growth will occur on land not designated for employment use.** Some new employment will occur outside commercial and industrial built space or land. For example, some construction contractors may work out of their homes, with no need for a shop or office space on non-residential land. Currently 12% of employment is located in residential zones. The EOA assumed that this trend will continue.
- **Some employment growth will not require new commercial or industrial built space or land.** Some employment growth will be accommodated on existing developed or redeveloped land, as when an existing firm adds employees without expanding space. Typically about 10 to 15% of new employment is accommodated in existing commercial or industrial built space. For example, businesses may add new cubicles to their existing

[2] This assumption is based on information from City staff, who have had contact with managers at Country Coach. At this point, it is challenging to predict how (or if) the RV industry in Lane County will recover from recent downturns in the RV industry.

office space, rather than move to a new office, resulting in an increased intensity of use of existing office space. The EOA assumed that 10% of new employment will be accommodated in existing commercial or industrial built space. The exception to this assumption is Government employment, which will have 1,800 employees on new land (at the new State Prison and Hospital). The remaining new Government employment (36 employees) may locate in existing built space.

Using these assumptions, Junction City will add about 2,989 new employees between 2009 and 2029. Excluding the 1,800 new employees at the State Prison and Hospital, Junction City will need to provide employment land for growth of 1,189 new employees.

Table 4-2. New employment locating in non-employment plan designations, Junction City, 2009-2029

		Employment Location		
Type	New Employment	Non-employment designtions	Existing Com. & Ind. Built Space	Employment on New Land
Employment Growth 2009 to 2029				
Industrial				
Industrial	419	0	42	377
Commercial				
Office	265	32	27	206
Retail	466	56	47	363
Other Services	313	38	31	244
Government	1,883	0	83	1,800
Total for 2009-2029	**3,345**	**126**	**230**	**2,989**

Source: Junction City Economic Opportunities Analysis, Table 5-5

Table 4-3 shows Junction City's estimated site needs for the 2009-2029 period. The City's site needs will be different than the current distribution of employment by site size because of the siting of the State Prison and Hospital and changes in the City's economy (e.g., the decline in the RV industry) will fundamentally change Junction City's economy over the next 20-years.

Table 4-3 shows that Junction City needs about 75 sites for the 2009-2029 period. Most sites are small, 2-acres or less. Junction City needs one site larger than 20-acres.[3] Need for small sites can be met through a

[3] Table 4-3 is based on analysis first prepared in 2009. Based on the community vision process (which was anticipated at the time of adoption of the 2009 EOA as part of Phase 2 of the EOA), together with a further assessment of current commercial site sizes as required to fully service retail, service businesses, and related commercial needs, the updated and revised EOA recognizes the need for a 20-50 acre commercial site to be provided within the 2009-2029 forecast period.

combination of individual sites and on a large site with co-location of office, retail, and other service businesses. Table 4-3 shows sites needed to accommodate growth of 1,189 jobs, which excludes the employees on at the State facilities (about 1,800 employees). This estimate does not include public land needed for the State Prison and Hospital or for expansion of the City's wastewater facility because these sites are needed for public uses and the location of these sites has already been determined.

Table 4-3. Estimated needed sites by site size and building type, Junction City, 2009 to 2029

	Site Size (acres)							
Building Type	Less than 1	1 to 2	2 to 5	5 to 10	10 to 20	20 to 50	Greater than 50	Total Sites
Need for 2009-2029								
Industrial	3	3	3	2	1	2	1	15
Office	5	3	2	1	0	0	0	11
Retail	30	6	4	1	0	0	0	41
Other Services	4	2	2	0	0	0	0	8
Government	0	0	0	0	0	0	0	0
Total for 2009-2029	**42**	**14**	**11**	**4**	**1**	**2**	**1**	**75**

Source: Junction City Economic Opportunities Analysis, Table 4-4
Note: This table is based on analysis first prepared in 2009. Based on the community vision process (which was anticipated at the time of adoption of the 2009 EOA as part of Phase 2 of the EOA), together with a further assessment of current commercial site sizes as required to fully service retail, service businesses, and related commercial needs, the updated and revised EOA recognizes the need for a 20-50 acre commercial site to be provided within the 2009-2029 forecast period.

The Office, Retail, and Other Services categories are building types that require commercial land. Taken together, 60 of the 75 needed sites are commercial sites.

Table 4-4 compares site needs from Table 4-3 with the supply of employment land. Table 4-4 concludes that Junction City has a deficit of 47 commercial sites. The EOA concludes that Junction City has 62 acres of unmet commercial land needs on vacant suitable sites ranging from smaller than one acre to a sub-regional commercial site.

Table 4-4. Comparison of vacant land supply and site needs, industrial and other employment land, Junction City UGB, 2009-2029

	Site Size (acres)							
	Less than 1	1 to 2	2 to 5	5 to 10	10 to 20	20 to 50	Greater than 50	Total Sites
Inventory of Suitable Sites								
Industrial	1	9	4	3	0	2	1	20
Commercial	25	2	0	0	1	0	0	28
Professional Technical	0	0	0	0	0	2	0	2
Total Suitable Sites	**26**	**11**	**4**	**3**	**1**	**4**	**1**	**50**
Site Needs								
Industrial	3	3	3	2	1	2	1	15
Commercial	39	11	8	2	0	0	0	60
Total sites needed	**42**	**14**	**11**	**4**	**1**	**2**	**1**	**75**
Surplus (deficit) of sites								
Industrial	(2)	6	1	1	(1)	0	0	
Commercial	(14)	(9)	(8)	(2)	1	0	0	
Professional Technical	0	0	0	0	0	2	0	

Source: ECONorthwest, Table 5-1 in the EOA
Note: Commercial land includes land in the following plan designations: Commercial and Commercial/Residential. The Professional Technical are the two sites classified as commercial in the 20 to 50 acre category, which will be unavailable for employment uses once the City completes redesignating the land to residential use.
Note: Sites needs in this table are based on Table 4-5, which was analysis first prepared in 2009. Based on the community vision process (which was anticipated at the time of adoption of the 2009 EOA as part of Phase 2 of the EOA), together with a further assessment of current commercial site sizes as required to fully service retail, service businesses, and related commercial needs, the updated and revised EOA recognizes the need for a 20-50 acre commercial site to be provided within the 2009-2029 forecast period.

Table 4-4 shows that Junction City has one commercial site in the 10 to 20 acre-category. This site is located at Junction City's northern end, is typically referred to at the "Y" site. About 15 of the 15.5 acres of this site are located in the floodplain. Consistent with assumptions about buildable lands in the residential land inventory and in the alternatives analysis (Section 5 of this document), land within the floodplain is not considered buildable for commercial uses.[4] **This City finds this site unsuitable for commercial development because it is in the floodplain.**

The community visioning process identified a broad range of potential commercial uses desired by Junction City residents. The EOA concludes that Junction City has 62 acres of unmet commercial land needs on vacant suitable sites ranging from smaller than one acre to a sub-regional commercial site. Commercial land demand may be accommodated on a combination of commercially designated land throughout Junction City and land outside the existing UGB, including a commercial center. The

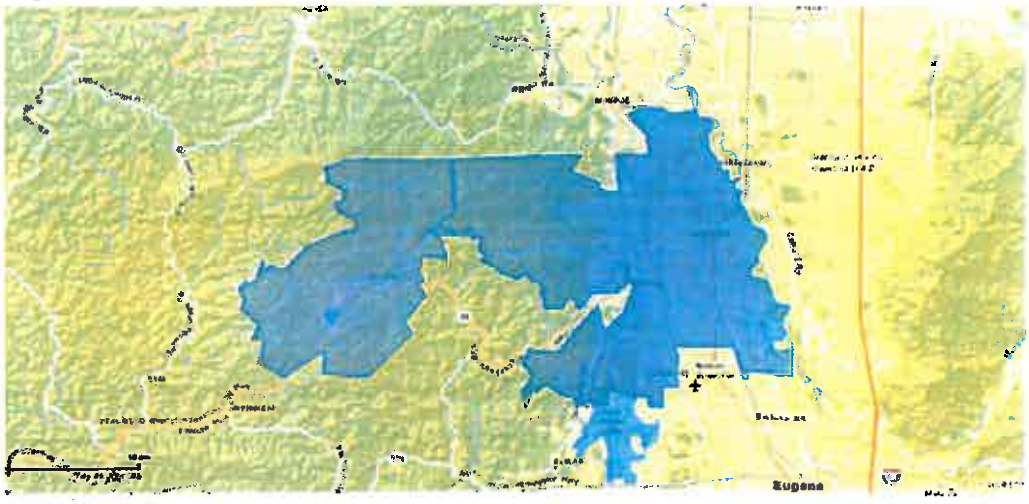
[4] When the commercial lands inventory was originally conducted, the floodplain was not considered a prohibitive constraint to development. Given the increasing uncertainty in developing in the floodplain (discussed in Section 5), the City revised its assumptions about the suitability of building on commercial land in the flood plain. As the "Y" site is the only substantially sized vacant commercial land in the floodplain, the City elected not to revise the entire commercial lands inventory and chose to make a finding about the unsuitability of developing in the floodplain in this document.

majority of commercial development will locate in Junction City in a new commercial center and in downtown.

The economic development vision is to provide a broader array of retail and service opportunities to Junction City residents and to capture sales leakage that is occurring to the Eugene market.

Data from ESRI, Inc. on retail sales in the Junction City and Blachly zip code areas (which are a loose approximation of the regional market—not including Harrisburg) show that Junction City is losing more than $25 million in potential sales annually to leakage shown in Figure 3-1 and Table 4-5.

Figure 3-1. Approximation of the Junction City regional market area



Source: ESRI, Inc.

Table 4-5. Retail sales potential and capture, Junction City (97558) and Blachy (97412) zip code areas[5]

Indicator	Amount
Demand (Retail Potential)	$112,224,431
Supply (Retail Sales)	$86,737,666
Retail Gap	$25,486,765
Leakage/Surplus Factor	12.8
Number of Businesses	107

Source: ESRI, Inc.

[5] Data Note: Supply (retail sales) estimates sales to consumers by establishments. Sales to businesses are excluded. Demand (retail potential) estimates the expected amount spent by consumers at retail establishments. Supply and demand estimates are in current dollars. The Leakage/Surplus Factor presents a snapshot of retail opportunity. This is a measure of the relationship between supply and demand that ranges from +100 (total leakage) to -100 (total surplus). A positive value represents 'leakage' of retail opportunity outside the trade area. A negative value represents a surplus of retail sales, a market where customers are drawn in from outside the trade area. The Retail Gap represents the difference between Retail Potential and Retail Sales. Esri uses the North American Industry Classification System (NAICS) to classify businesses by their primary type of economic activity. Retail establishments are classified into 27 industry groups in the Retail Trade sector, as well as four industry groups within the Food Services & Drinking Establishments subsector. For more information on the Retail MarketPlace data, please view the methodology statement at http://www.esri.com/library/whitepapers/pdfs/esri-data-retail-marketplace.pdf.

In 2011, Junction City had one major chain grocery store (Safeway) and a few convenience stores. A review of Oregon cities in the in Junction City's current (6,600) and forecasted size 13,300 by 2031) shows all have more than one chain grocer.[6] Many have three or four. Table 4-6 shows the results of an inventory of chain grocers in selected Oregon cities.

Table 4-6. Number of commercial centers with chain grocers, selected Oregon cities

City	2010 Population	Number of Centers with Chain Grocer
Canby	15,230	2
Ontario	11,366	4
Baker City	9,828	2
Cottage Grove	9,686	2
Sandy	9,570	3
Prineville	9,253	3
Silverton	9,222	2
Madras	6,650	3

Source: ECONorthwest, Google Earth

Table 4-7 shows the size of commercial centers in selected cities in Oregon. Further analysis of the size and types of businesses in these centers suggests that chain grocers will chose to co-locate with other retail and service activities wherever possible. The cities in Table 4-7 were selected as being comparable to Junction City because their current size is similar to either Junction City's current size or Junction City's expected size at the end of the 20-year planning period.

[6] The sample excludes several Oregon cities in this population range for various reasons. Some cities such as Monmouth, are close enough to other cities as to functionally not be in the population range. Other cities such as Newport, are highly influenced by tourism.

Table 4-7. Anchor stores and size of commercial centers in selected Oregon cities

City	Anchor	Size (acres)	Comments
Baker City	Albertson's	22	Includes a hotel
	Safeway	6	Across from the Albertson's
Canby	Fred Meyers	20	
Cottage Grove	Walmart	13	Area does not include other nearby commercial uses
	Safeway	15	Functionally combined with theBiMart site
Ontario	BiMart	8	
	Walmart / Home Depot / Big K	137	Includes a broad away of services, including travel services
	Albertson's	18	
Junction City	Safeway	5	
Madras	BiMart	12	
Prineville	Ray's	24	Includes office development
	Grocery Outlet / BiMart	7	
Sandy	Fred Meyers	28	Includes a threater complex
	Grocery Outlet	18	Includes a health club
	Safeway	13	
Silverton	Safeway	12	
	Roth's IGA	4	

Source: ECONorthwest, Google Earth

Table 4-8 shows the site characteristics of commercial centers from Table 4-7, where the center has a mixture of uses. The characteristics of the sites in Table 4-8 are:

- **Mix of uses.** Each of the sites includes a mixture of retail and service uses, with a large anchor tenant. Several of the sites include office uses and public uses (e.g., branch library).
- **Site size.** The sites range in size from 12 acres to 137 acres.
- **Access to transportation.** Each of the sites is located along a major transportation corridor, generally a state highway.
- **Visibility.** The sites are nearly all highly and directly visible from the transportation corridor.
- **Surrounding land uses.** Surrounding land uses vary and include commercial, light industrial, and agricultural uses. Residential neighborhoods may be adjacent to the commercial center but are generally between one-quarter and one mile away from the center.

Site characteristics not shown in Table 4-8 are:

- **Development constraints.** None of the sites has obvious development constraints.
- **Topography.** The sites are generally flat, appearing to have a slope of not more than 5%.
- **Access to services.** The sites appear to have access to urban services.
- **Proximity to the UGB.** The sites are located within an urban growth boundary.

Table 4-8. Characteristics of selected commercial centers in Oregon cities

City	Mix of uses	Site size (acres)	Access to major transportation facility	Visible from transp. facility	Surrounding land use
Baker City	Grocery store, dry goods store, financial services, restaurants, celluar communications, hotel, auto parts, service station	22	On Baker-Cooperfield Highway (Hwy 7 and OR 86), at an I-84 interchange	Yes	Other commercial uses and residential housing within a block on northern edge of the site
Canby	Dry goods and grocery store, dentist, electronic store, laundromat, restaurants, financial institution	20	On Highway 99 E	Yes	Commercial and light industrial uses, residential uses on the other side of Highway 99 E.
Madras	Dry goods store, motel, restaruants, cellular communications, other personal services	12	On Highways 26 and 97	Yes	Agricultural, residential, other commercial
Ontario	Grocery store, dry goods store, home improvements store, financial services, restaurants, celluar communications, personal services, three hotels, service station, verterans service office	137	On U.S. 30, at an I-84 interchange	Yes	Oregon State Police, variety of commercial uses across RT 30
Prineville	Grocery store, pharmacy, dry goods store, three hotels, furniture store, hardware store, financial services, restaurants, celluar communications, nonprofit office, school district offices	24	On U.S. 26	Yes	Other commercial, about one half to one mile to residential areas
Sandy	Dry goods and grocery store, restaurants, hair salon, financial institution, cinema, service station, public offices, automotive body shop, other personal services	28	On U.S. 26	yes	Industrial uses, agricultural areas
Sandy	Grocery store, athletic clubs, veternary clinic, restaurants	18	On U.S. 26	yes	Commercial uses, agricultural lands, residential development 1/2 mile or more away
Silverton	Grocery store, pharmacy, athletics club, restaurants, personal services	12	Less than 1/8 mile off of OR 213	Unsure	Commercial uses, Cemetery, Hospital, and adjacent residential uses

Source: ECONorthwest, Google Earth

The inventory summarized in Table 4-7 and Table 4-8 suggests:

- Junction City's existing commercial center is among the smallest of the centers reviewed.
- Every city had one or more commercial center over 10 acres.

- Several commercial centers are in the 20-30 acre size. These centers provided a much broader array of activities than smaller centers. They include uses such as hotels, theaters, automotive services, health clubs, home improvement stores, and others.
- The commercial centers are located along highways and are highly visible from the highway.

Based on the information in Tables 4-4 through 4-7, Junction City has a structural deficit of larger commercial sites, frequently 20 acres and larger. Over the next 20 years, demand for commercial services and retail will increase, with projected growth of 6,000 new people, as well as development of the State Facilities. This increase in demand will result in need for a new sub-regional commercial center.

PARK LAND NEED

Statewide Planning Goal 8 requires cities to plan for recreational needs.

> *To satisfy the recreational needs of the citizens of the state and visitors and, where appropriate, to provide for the siting of necessary recreational facilities including destination resorts.*

Junction City prepared and adopted a Parks Master Plan (The Parks and Paths of Junction City: an Integrated Parks, Open Space and Trails Master Plan) on May 11, 2010 (Resolution 1015). The City of Junction City now wishes to rely on this document as support for the Comprehensive Plan.

The Plan includes a community needs assessment that details the City's strategies for meeting park facility needs for the 2010-2030 period.

The Parks Master Plan is designed as a tool for planning, programming, and capital improvements for meeting the recreational needs for the citizens of Junction City. The Plan identifies current and future park and recreation needs; identifies alternative ways to meet the needs of the citizens; and establishes a capital improvement program to meet the recreational needs of the City of Junction City.

Following are key findings from the Junction City Parks Master Plan related to park needs.

- **Park Inventory**. The Parks Plan includes an inventory of parks in Junction City. The Plan states:

  There are currently 14.64 acres of developed City maintained parkland within the City. This includes eleven park spaces that are owned by the

City, one by Lane County, and one that is owned by the School District. The parks owned by the City include neighborhood parks, pocket parks, and special use parks that serve the day-to-day recreation needs of the community. There is an additional 22.77 acres of parkland that has been acquired by the City for park development.

- **Level of Service**. Most parks plans identify a current and desired future level of service standard, which is typically expressed as acres per 1000 residents. The purpose of the level of service standard is to estimate how much park land will be needed to meet future population growth.

  Based on the park inventory, the plan concludes Junction City has a current level of service of 2.85 acres per 1000 residents. The Plan indicates that the City expects the level of service to increase to 7.28 acres per 1000 residents after development of two undeveloped public park spaces (Raintree Meadows and The Reserve).

  The Parks Plan establishes a future level of service standard of 10 acres per 1000 population.

  Based on this level of service standard, the Parks Plan identifies an existing deficit of parkland as of 2010. **The plan identifies a 13.94 acre deficit to meet current needs as stated by the level of service. In other words, the City needs to add 13.94 acres to the system to achieve the 10 acre per 1000 level of service standard in 2010.**

  The Plan identifies a **2030 need of 60.59 acres** (inclusive of the 13.94 acre existing deficit) to achieve the 10 acre per 1000 level of service standard with a 2030 population of 10,268 persons. In summary, the City will need 100.27 acres of parkland in 2030 to meet identified needs. The City has a current inventory of 37.41 acres.

- **Park Classifications.** The plan identifies several classifications of parks. The UGB proposal is to add a site for a Community Park. The Parks Master Plan defines a community park as follows:

  These parks are intended to meet the recreation needs of large section of the community as well as those of the surrounding neighborhood. They include areas of diverse uses, both active and passive, including

swimming, tennis, walking, and picnicking, to name a few.

Moreover, Table 5 (page 34) identifies a desirable size range of 10 to 30 acres for Community Parks. Junction City does not currently have any developed Community Parks.

- **Park needs.** The Parks Plan concludes that the City has current unmet park needs:

  Per the inventory and analysis of existing conditions, it was found that the City does not currently have a Community Park. With addition of minimum 10 acre Community Park, the City would have 9.4 acres of parkland per 1000 population.

  The Parks Plan identifies the need for a Community Park of at least 10 acres.

The next step in the process of assessing park need is to allocate the need to plan designations. Most of the city's current inventory of parkland is designated "Public" on the Comprehensive Plan map. Typically, parkland is acquired out of the residential land base and redesignated after acquisition. Moreover, the Parks Master Plan identifies sites the city currently owns as sites for future parks. The Master Plan also identifies general areas where the city would like to acquire parkland, but does not identify specific privately-owned parcels. Many of these sites are inside the UGB, so acquisition and development of these sites for park use would reduce the amount of land in the residential inventory.

Thus, the city finds that parkland needs should be allocated as part of the overall residential land inventory.[7] The Parks Master Plan recommends that park and open space development occur in residential areas, but does not identify how that need would be allocated by plan designation. The city finds it appropriate to allocate future parkland proportionally to acres needed for housing by plan designation. Table 4-9 shows the allocation of parkland need by plan designation.

[7] For example, 71% of the City's residential land need is in LDR. As a result, 71% or 42.8 acres of park land need will be in LDR.

Table 4-9. Parkland need by Plan Designation, 2012-2032

	Gross Acres Needed for Housing	Percent of Acres Needed for Housing	Acres Needed for Parks
Low-Density Residential	209	71%	42.8
Medium-Density Residential	59	20%	12.1
High-Density Residential	28	9%	5.7
Total	**296**	**100%**	**60.6**

The City proposes to add 10 acres of parkland to the UGB to address the City's deficit of parkland and the long-term deficit of 60.59 acres. The addition of a 10 acre park would also meet the identified need for a Community Park.

RESIDENTIAL LAND NEED

The Housing Chapter of the Junction City Comprehensive Plan identifies housing and land needs for the 2011-2031 period for the Junction City UGB. The land need analysis is based on (1) the county coordinated population forecast, and (2) an analysis of Junction City's housing needs that complies with Statewide Planning Goal 10 . This section summarizes the key elements of the housing needs analysis.

Estimating total new dwelling units needed during the planning period is a relatively straightforward process. Demand for new units is based on the county coordinated population forecast as required by ORS 195.036. Persons in group quarters are then subtracted from total persons to get total persons in households. Total persons in households is divided by persons per household to get occupied dwelling units. Occupied dwelling units are then inflated by a vacancy factor to arrive at total new dwelling units needed.

Population Forecast: 2011-2031

The foundation of the estimate of needed new units is the population forecast. Lane County adopted "county coordinated" population forecasts in June 2009.[8] The county figures include a forecast for the Junction City UGB. That forecast includes assumptions about population residing in the state facilities (e.g., the prison and hospital) proposed to be built in the Junction City UGB.

[8] Lane County adopted the population in the *Lane County Rural Comprehensive Plan General Plan Policies 1984*, adopted June 2009.

Table 4-10 shows the population forecast for Junction City for the 2010-2035 period. The coordinated forecasts were prepared by the Population Research Center at Portland State University and were adopted by Lane County in June 2009. The adopted figures show a 2011 population of 7,194 persons and a 2031 population of 13,286. This results in a forecast for 6,092 new persons, or an increase of about 85% for the 20-year period. This results in an average annual growth rate of 3.1%.

Table 4-10. Junction City population forecast, 2010-2035

		Change	
Year	**Population**	**Number**	**AAGR**
2011	7,194		
2016	9,634	488	6.0%
2021	11,053	284	2.8%
2026	12,281	246	2.1%
2031	13,286	201	1.6%
Change 2011-2031			
Number	6,092		
Percent	85%		
AAGR	3.1%		

Source: Lane County Adopted Coordinated Population
Lane County Rural Comprehensive Plan General Plan Policies 1984, adopted June 2009

The 2009 coordinated population figures include estimates of population that will be housed in the proposed state correctional facility and hospital. As such, these figures were deducted from the portion of the population that will have housing and related land needs (the state already owns sites in the UGB for the facilities, but they have not yet been developed).

According to the 2010 Census, 75 persons in Junction City were housed in group quarters. This equates to about 1.4% of the city's 2010 population. Applying this figure results in a 2011 estimate of 100 persons in group quarters and 2031 group quarters population of 186 persons. ECO used a 2031 prison population of 1,900 (the mid-point between the 1,800 and 2,000 figures presented in the PSU report) and a 2031 hospital population of 360 persons.

Table 4-11 shows that added together, this results in a 2031 group quarters population of 2,646 persons. Subtracting the estimated 100 persons in group quarters in 2011 results in **2,446 new persons in group quarters during the 2011-2031 period.**

Table 4-11. Estimated population in group quarters, 2011-2031

Variable	Value
Population 2031	13,286
Base GQ % (from 2010)	1.4%
Base GQ in 2031	186
Prison population in 2031	1,900
Hospital population in 2031	360
New GQ 2011-2031	2,446

Source: Center for Population Research and Census, Portland State University (historic figures); Lane County Coordinated Population Forecasts; 2000 Census; analysis by ECONorthwest

Note: the estimated prison population is 2031 is the mid-point between the 1800 and 2000 figures (1900 persons) presented in the PSU report.

Housing Need Estimate

Junction City estimated housing need based on the recommended approach described in "Planning for Residential Growth: A Workbook for Oregon's Urban Areas," the Department of Land Conservation and Development's guidebook on local housing needs studies. The housing needs analysis in the Housing Element followed the steps described in the Workbook. Key results of that analysis are presented in this section.

Projection of new housing units needed in the next 20 years

Table 4-12 shows the estimate of new housing units needed in the Junction City UGB for the 2011-2031 period. The projection is based on the following assumptions about the Junction City UGB:

- Total population will increase by 6,092 people from 2011 to 2031; population in occupied households will increase by 3,646 persons.
- About 40% percent of the new population in the Junction City UGB, or 2,446 people, will locate in group quarters. The majority of these new people will reside in the state facilities.
- The average household size within the UGB will be 2.43 people per household, based on information from the 2010 Census, the safe harbor assumption established in OAR 660-024-0040(8)(a).

  OAR 660-024-0040(8)(a). A local government may estimate persons per household for the 20-year planning period using the persons per household for the urban area indicated in the most current data for the urban area published by the U.S. Census Bureau.

- Vacancy rates for all housing types within the UGB will be 6.0% based on information from the 2010 Census, the safe harbor assumption established in OAR 660-024-0040(8)(e).

OAR 660-024-0040(8)(e). A local government outside of the Metro boundary may estimate its housing vacancy rate for the 20-year planning period using the vacancy rate in the most current data published by the U.S. Census Bureau for that urban area that includes the local government.

Applying these assumptions results in a need for 1,590 new dwellings over the 2011-2031 period. This equates to an average of 80 dwelling units annually over the 20-year period.[9]

Table 4-12. New dwelling units needed, Junction City UGB, 2011-2031

Variable	Estimate of Housing Units (2011-2031)
Change in persons	6,092
minus Change in persons in group quarters	2,446
equals Persons in households	3,646
Average household size	2.43
New occupied DU	1,500
times Aggregate vacancy rate	6.0%
equals Vacant dwelling units	90
equals **Total new dwelling units (2011-2031)**	**1,590**
Dwelling units needed annually	80

Source: Calculations by ECONorthwest

Estimate the number of additional needed units by structure type

Table 4-13 presents an estimate of need for housing by income and housing type, to identify the types of housing that are likely to be affordable over the 2011-2031 period. This analysis requires some estimate of the income distribution of future households in the community, based on income data from the 2010 Census.

Table 4-12 shows that Junction City needs 1,590 new dwelling units for the 2011-2031 period. The first step in estimating units by structure type is to evaluate income as it relates to housing affordability. Table 4-13 shows an estimate of needed dwelling units by income level for the 2011-2031 period. The analysis uses market segments consistent with HUD income level categories. The analysis shows that about 43% of households in Junction City could be considered high or upper-middle income in 2009 and that about 43% of the housing need will derive from households in these categories.

[9] This figure is presented as a reference to provide context for the rate of new housing production. The actual figures will vary from year to year as they have in the past.

Table 4-13. Estimate of needed dwelling units by income level, Junction City, 2011-2031

Market Segment by Income	Income range	Number of New Households	Percent of Households	Financially Attainable Products: Owner-occupied	Financially Attainable Products: Renter-occupied	
High (120% or more of MFI)	$68,640 or more	347	22%	All housing types; higher prices	All housing types; higher prices	↑
Upper Middle (80%-120% of MFI)	$45,760 to $68,640	336	21%	All housing types; lower values	All housing types; lower values	Primarily New Housing
Lower Middle (50%-80% of MFI	$28,600 to $45,760	400	25%	Manufactured on lots; single-family attached; duplexes	Single-family attached; detached; manufactured on lots; apartments	Primarily Used Housing
Low (30%-50% or less of MFI)	$17,160 to $28,600	243	15%	Manufactured in parks	Apartments; manufactured in parks; duplexes	↓
Very Low (Less than 30% of MFI)	Less than $17,160	264	17%	None	Apartments; new and used government assisted housing	

Source: ECONorthwest

The three household characteristics that are most closely correlated with household choice: (1) income, (2) age, and (3) household composition. The housing needs analysis describes the demographic and socioeconomic trends in Junction City and Lane County related to these three factors. The majority of Junction City's population growth is expected to be the result of in-migration.[10] It is difficult (if not impossible) to accurately project the characteristics of households that may move to Junction City over the next 20 years, beyond the projections for changes in population by age group. To some degree, projecting future housing preference relies on estimating the ways that the characteristics of new households in Junction City will be different and make different housing choices than existing households.

The Housing Element describes the demographic trends that will affect housing demand across the U.S., as well as Oregon and Junction City, including: the aging of the baby boomers, growth in echo boomers, increases in ethnic diversity, changes in household composition, and new workers at the State facilities.

Table 4-14 presents the forecast the distribution of housing in Junction City for the 2011 to 2031 period by plan designation, based on these trends.

[10] The Portland State University Population Research Center's annual estimate of population shows that 74% of Lane County's population growth between 2000 and 2010 is the result of in-migration. We assume that in-migration will continue to account for the majority of growth in Lane County over the planning period.

- **Low Density Residential (LDR)** will accommodate 55% of new dwellings, 875 dwellings.
- **Medium Density Residential (MDR)** will accommodate 25% of new dwellings, 398 dwellings.
- **High density Residential (HDR)** will accommodate 20% of new dwellings, 318 dwellings.

Table 4-14. Forecast of future housing by plan designation, Junction City UGB, 2011-2031

	Estimate of Housing Units (2011-2031)
Total new dwelling units (2011-2031)	1,590
Dwelling units by density class	
Low Density Residential	
Percent Low Density Residential	55%
***equals* Total new DU in LDR**	**875**
Medium Density Residential	
Percent Medium Density Residential	25%
Total new DU in MDR	**398**
High Density Residential	
Percent High Density Residential	20%
Total new DU in HDR	**318**

Source: ECONorthwest

The assumptions about the distribution of new dwellings among plan designations in Table 4-14 is consistent with the safe harbor for housing mix in OAR 660-024 Table 1. While Junction City is not using the safe harbor assumptions from OAR 660-024 Table 1, the City believes that these assumptions are reasonable assumptions about how Junction City will grow in the future based on:

- Between 2000 and 2008, two-thirds of new housing (212 dwellings) were built in LDR and about one-third (97 dwellings) were built in MDR.
- As part of the 2012 comprehensive plan update, the City established a high-density residential plan designation and made corresponding plan map amendments.
- Increasing the share of higher-density multifamily housing types built over the next 20-years will provide a broader range of housing options. This broader range of housing options can provide opportunities for workforce housing and affordable housing for new and existing residents of Junction City.

- About 69% of Junction City's current housing stock is single-family attached or manufactured homes. The remaining 31% of the City's housing stock is in: structures with two to four units (17% of dwellings), structures with 5 or more units (13%), or single-family attached housing (2%)
- About 37% of Junction City's households are cost burdened (pay more than 30% of their income for housing), with 44% of renters cost burdened and 33% of homeowners cost burdened.

Determine the needed density ranges for each plan designation and the average needed net density for all structure types

Determining land needed to accommodate housing requires making assumptions about future densities. The basis for these assumptions is housing densities achieved recently, over the 2000 to 2008 period in Junction City. Table 4-15 shows average residential densities achieved in residential plan designations and zoning districts. The results show:

- **Average.** The overall average density achieved in urban residential plan designations was 7.1 dwellings per net acre.
- **Low-Density.** The zoning district for the LDR designation is R1, with an average density of 6.0 dwelling units per acre.
- **Medium-Density.** The zoning district for the MDR designation is R2, with an average density of 7.3 dwelling units per acre.
- **High-Density.**[11] The zoning districts for the HDR designation is R3 and R4. Densities achieved in R3 averaged 20.1 dwelling units per net acre. The type of development in R4 was predominantly mobile homes in parks, with an average density in the zone of 5.5 dwelling units per net acre.

[11] While Junction City did not have an HDR Plan Designation during the 2000 to 2008 period, the City is creating an HDR Designation. Zoning districts R3 and R4 will be in the HDR Designation.

Table 4-15. Actual residential density (DU/net acre) observed in residential plan designations, Junction City UGB, 2000-2008

Plan Designation / Zoning District	Existing DU	New DU, 2000-2008	Total DU	Acres	Density (DU/NRA)
Low-Density Residential					
R1		182	182	30.5	6.0
Medium-Density Residential					
R2		26	26	3.5	7.3
High-Density Residential					
R3	80	61	141	7.0	20.1
R4	163	34	197	36.0	5.5
Total	**243**	**303**	**546**	**77.1**	**7.1**

Source: Junction City GIS, LCOG address file; analysis by ECONorthwest
Note: Junction City did not have an HDR Plan Designation during the 2000 to 2008 period. The City is creating an HDR Designation. Zoning districts R3 and R4 will be in the HDR Designation.

Table 4-16 presents an estimate of residential land need to accommodate growth of 1,590 new dwellings over the 20-year period. Junction City will need 295 acres of residential land, at an overall density of 7.4 dwelling units per net acre of 5.4 dwelling units per gross acre. Table 4-16 shows the following land needs by plan designation:

- **Low Density Residential (LDR)** will develop at an average density of 5.9 dwelling units per net acre, or 4.2 dwelling units per gross acre, assuming a 29% net-to-gross acre factor. Junction City will need 209 gross acres of land in LDR.

  The average density of 5.9 dwelling units per net acre is based on the development density for single-family detached housing during the 2000-2008 period (Table 3).

- **Medium Density Residential (MDR)** will develop at an average density of 9.5 dwelling units per net acre, or 6.7 dwelling units per gross acre, assuming a 29% net-to-gross acre factor. Junction City will need 59 gross acres of land in MDR.

  The average density of 9.5 dwelling units per net acre is based on the assumption that development density in MDR will increase from 8.6 (observed development density during the 2000-2008 period (Table 4)) to 9.5 dwelling units per net acre. This assumption is based on:

  - Anticipation of a broader range of housing options that may be developed in Junction City over the next 20-years based on changes in the City's housing policy.
  - Need for additional affordable housing, as shown by the large share of cost-burdened renters (44% of renters).

The density assumption also assumes that the net-to-gross conversion factor for MDR will be the same as for LDR (rather than the 32% shown in Table 4-17). This rationale for this assumption that the newer development in MDR will require the same amount of land for rights-of-way as LDR, rather than more land for rights-of-way.

- **High density Residential (HDR)** will develop at an average density of 13.0 dwelling units per net acre, or 11.4 dwelling units per gross acre, assuming a 12% net-to-gross acre factor. Junction City will need 28 gross acres of land in HDR.

  Junction City does not currently have a high density Comprehensive Plan designation. The density of 13.0 dwelling units per net acre is based on the development density of multifamily housing (e.g., apartments or duplexes), single-family attached housing, and manufactured dwellings in parks achieved during the 2000-2008 period (Table 13).

Table 4-16. Residential land need estimate, Junction City UGB, 2011-2031

Plan Designation	Number of DU	Density (DU/Net Ac)	Net Acres Needed	Density (DU/Gross Acre)	Gross Acres Needed
Low-density (55% of total DU need)	875	5.9	148	4.2	209
Medium-density (25% of total DU need)	398	9.5	42	6.7	59
High-density (20% of total DU need)	318	13.0	24	11.4	28
TOTAL	**1,590**	**7.4**	**215**	**5.4**	**295**

Source: ECONorthwest

The assumptions about housing density in Table 4-16 exceed the safe harbor for housing density in OAR 660-024 Table 1, which requires a city to assume an overall minimum of 7.0 dwellings per net acre for a UGB analysis. While Junction City is not using the safe harbor assumptions from OAR 660-024 Table 1, the City finds that an average residential density of 7.4 dwelling units per net acre will meet identified housing needs for the following reasons:

- The assumed net densities by plan designation (see Table 4-15) are based on actual densities achieved in Junction City over the 2000 to 2008 period.
- Junction City is addressing need for additional affordable housing through several measures that increase the types of housing available in Junction City, including availability of higher density housing:

- Junction City is establishing a high-density plan designation, which will allow housing up to 27.4 dwelling units per acre.
- Junction City is planning for a shift in the mix of housing types. Over the 2000 to 2008 period, housing in LDR accounted for about 67% of new housing and the remaining 33% in MDR. The City is assuming that housing in LDR will account for 55% of new housing, with 25% of new housing in MDR and 20% in HDR.

- Table 4-16 shows housing need for net acres,[12] which does not include land for rights-of-way (e.g., roads or sidewalks). Table 4-16 shows a conversion of net acres to gross acres based on the net-to-gross assumptions in Table 4-17.

Table 4-16 presents an estimate of land need in net and gross acres. The conversion from net-to-gross acres in Table 4-16 is based on the amount of land needed for rights-of-way in Junction City. Table 4-17 shows the amount of land in residential plan designations that is in tax lots and that is not in tax lots in Junction City in 2008. Land not in tax lots is typically land used for public uses such as rights-of-way. Other public uses where land is in tax lots, such as parks or schools, is not included in this analysis.

Table 4-17. Land not in tax lots, net-to-gross conversion for residential plan designations, Junction City UGB, 2008

Plan Designation	Total Acres	Acres in Tax Lots	Acres Not in Tax Lots	Net to Gross Factor
Low-Density	239	171	68	29%
Medium-Density	157	107	50	32%
High-Density	154	135	19	12%
Total / Average	550	413	137	25%

Source: Junction City GIS, LCOG address file; analysis by ECONorthwest
Note: High-Density housing includes dwellings built in zones R-3 and R-4.

Estimate of land needed to accommodate housing growth over the 2011 to 2031 period

Table 4-18 shows a comparison of residential land supply (Table 5-7) with the residential land need estimate (Table 4-16) and parkland need (Table 4-9). The results show that Junction City has a deficit of 26 acres of

[12] The housing needs analysis is conducted in net acres. OAR 660-024-0010(6) uses the following definition of net buildable acre. "Net Buildable Acre" consists of 43,560 square feet of residentially designated buildable land after excluding future rights-of-way for streets and roads. While the administrative rule does not include a definition of a gross buildable acre, using the definition above, a gross buildable acre will include areas used for rights-of-way for streets and roads.

medium density residential land. Junction City has a one acre surplus of land in low density residential and commercial/residential land.

Table 4-18. Comparison of buildable residential land with land needed for housing and parks, gross acres, Junction City, 2011-2031

Plan Designation	Zoning	Buildable Land (Gross Acres)	Needed Land (Gross Acres)		Surplus/ (deficit) (Gross Acres)
			Housing	Parks	
LDR	R1	252	209	43	0
MDR	R2	45	59	12	-26
HDR	R3/R4	34	28	6	0
Commercial/Residential	CR	1			1
TOTAL		**332**	**295**	**61**	

Source: City of Junction City GIS data; analysis by ECONorthwest
Note: The number of buildable acres is rounded.

The City proposes to add 16 acres of MDR land and 10 acres of parkland to address the 26 acre MDR deficit.

Need for affordable and manufactured housing

The Junction City Zoning Ordinance (City Ordinance 950)[13] does not contain any provisions that regulate government-assisted housing. Therefore, the City is in compliance with this requirement.

> *OAR 660-024-0040(8)(b): If a local government allows manufactured homes on individual lots as a permitted use in all residential zones that allow 10 or fewer dwelling units per net buildable acre, it is not necessary to provide an estimate of the need for manufactured dwellings on individual lots.*

The Junction City Zoning Ordinance (City Ordinance 950)[14] allows manufactured homes as outright uses in the R-1 (Junction City Ordinance 950, Section 9(7)) and R-2 (Junction City Ordinance 950, Section 15(2)) zones. Manufactured home parks are permitted in in R-4 (Junction City Ordinance 950, Section 27(2). Manufactured home parks are a conditional use in R-3 (Junction City Ordinance 950, Section 22(2).

ORS 197.480(4) requires that cities "inventory the mobile home or manufactured dwelling parks sited in areas planned and zoned or generally used for commercial, industrial or high density residential development" Table 4-19 presents this inventory.

[13] http://www.ci.junction-city.or.us/ord/title10/10_11.frameheader.html

[14] http://www.ci.junction-city.or.us/ord/title10/10_11.frameheader.html

Table 4-19. Manufactured housing parks, Junction City, 2012

Park	Plan Designation or Zoning District	Type	Spaces Total	Spaces Vacant
Farmview Park	R-4	55+	22	0
Our Tivoli Park	MDR	Family	42	0
Prairie Winds of Junction City	Commercial / LDR	Family	25	0
Scandia Village	R-4	55+	62	1
The Meadow on Pitney Pond	R-4	Family	104	0
Valley Village Park	MDR	Family	18	0
Terra Firma	General Commerical		9	Unknown

Source: Oregon Housing and Community Services, Oregon Manufactured Dwelling Park Directory, http://o.hcs.state.or.us/MDPCRParks/ParkDirQuery.jsp

ORS 197.480(2) requires:

A city or county shall establish a projection of need for mobile home or manufactured dwelling parks based on:

(a) Population projections;

(b) Household income levels;

(c) Housing market trends of the region; and

(d) An inventory of mobile home or manufactured dwelling parks sited in areas planned and zoned or generally used for commercial, industrial or high density residential development.

The preceding analysis shows that:

- Junction City will grow by 3,646 persons in households or 1,590 dwelling units over the 2011 to 2031 period.
- About one-third of Junction City's new households will be low income, earning 50% or less of the County's median family income. One type of housing affordable to these households is manufactured housing. The households most likely to live in manufactured homes in parks are those with incomes $17,000 and $29,000 (30 to 50% of median family income). Assuming that about one-quarter of new households in this income category choose to live in manufactured dwellings in parks, there would be demand for 60 spaces in manufactured dwelling parks.
- Manufactured housing accounts for between 10% and 20% of Junction City's current housing stock.
- In addition, national, state, and regional trends during the 2000 to 2008 period showed that manufactured housing parks were closing, rather than being created. It is unclear, however, whether the trend to closure and redevelopment of manufactured housing parks will continue after the housing market recovers from the current downturn.

The City concludes the City may need one or two new manufactured housing parks with a total of about 60 new spaces, requiring about 5 acres of land.

ORS 197.408(3) requires the City to "establish the need for areas to be planned and zoned to accommodate the potential displacement of the inventoried mobile home or manufactured dwelling parks" for manufactured dwelling parks sited in areas planned and zoned or generally used for commercial, industrial or high density residential development. About 197 manufactured dwelling are located in these plan designations. If about one-quarter of these households are displaced by redevelopment of manufactured dwelling parks, then the City will have need for about 50 new dwellings, which at high density residential densities would require about 4 acres of land.

The City concludes that these needs can be met on existing residential or commercial lands through infill or redevelopment.

Section 5 Alternatives Analysis

Section 4 concluded that Junction City has insufficient land to accommodate projected growth in the following areas:

- Retail and service commercial (62 vacant suitable acres)
- Parkland (10 acres in Medium-density residential)
- Medium-density residential (16 acres)

This section presents the alternatives analysis required by OAR 660-024-0060 as well as findings related to the four Goal 14 factors.

COMMERCIAL

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.*

Friends of Yamhill County v. City of Newberg, 62 Or LUBA 5 (2010), established a two-prong test for establishing relevant "site characteristics" as follows: (1) that the attribute be "typical of the industrial or

employment use" and (2) that it have "some meaningful connection with the operation of the industrial or employment use." The first of those prongs, that the attributes be "typical," appears expressly in OAR 660-009-0015(2), which refers to "site characteristics typical of expected uses." In upholding LUBA's two prong test, the Court of Appeals agreed, "[t]hat 'necessary' site characteristics are those attributes that are reasonably necessary to the successful operation of particular industrial or employment uses, in the sense that they bear some important relationship to that operation." *Friends of Yamhill County v. City of Newberg*, 240 Or App 738, 747 (2011).

The City begins its alternative sites analysis by reviewing commercial land need and supply within the existing UGB. The purpose of this analysis is to determine whether the City has a surplus of commercial land that might be available to meet identified commercial employment needs.

Table 5-1 shows vacant employment land by plan designation. The results show that Junction City has 22 acres of vacant suitable commercial and commercial/residential land. However, 15 acres of this land is in floodplain, on the site referred to as the "Y" site. Consistent with assumptions about buildable lands in the residential land inventory and in the alternatives analysis (Section 5 of this document), land within the floodplain is not considered buildable for commercial uses.[15] **The City finds this site unsuitable for commercial development because it is in the floodplain.** As a result, the City has seven acres of vacant suitable commercial and commercial/residential land, all on sites two acres or smaller.

Table 5-1 also shows that the City has 157 vacant suitable acres of industrial land. The EOA identified no need for Professional Technical land for the 2011-31 planning period. Thus, the City is redesignating the 70 suitable acres of Professional/Technical land, predominantly for residential uses, as described in a separate section of this document.

[15] When the commercial lands inventory was originally conducted, the floodplain was not considered a prohibitive constraint to development. Given the increasing uncertainty in developing in the floodplain (discussed in subsequently in Section 5), the City revised its assumptions about the suitability of building on commercial land in the flood plain. As the "Y" site is the only substantially sized vacant commercial land in the floodplain, the City elected not to revise the entire commercial lands inventory and chose to make a finding about the unsuitability of developing in the floodplain in this document.

Table 5-1. Vacant land employment by plan designation, Junction City UGB, 2008

Plan Designation	Tax Lots	Acres in Tax Lots	Vacant Land	
			Unsuitable Acres	Suitable Acres
Commercial	14	20	0	20
Commercial/Residential	14	2	0	2
Industrial	20	189	32	157
Professional/Technical	2	85	15	70
Public	1	39	36	3
Total	**51**	**335**	**83**	**251**

Source: City of Junction City GIS data; analysis by ECONorthwest
Note: The number of unsuitable acres (83) and suitable acres (251) add to 334 acres, rather than the 335 Acres in Tax Lots, as a result of a rounding error.
Note: Fifteen of the 20 acres of Commercial land is in the floodplain and is considered unsuitable for commercial development, leaving 5 acres of vacant Commercial land.

The demand for 62 vacant suitable acres of commercial land (in Table 4-4) assumes that all 7 acres of suitable commercial and commercial/residential land will develop over the 20-year planning period. The 62 vacant suitable acres of commercial land must be accommodated on land with existing development (e.g., through infill or redevelopment of sites within the UGB), through expansion of the UGB or both.

In subsequent sections, these findings consider the potential for designated employment lands within UGB and within nearby exception areas to meet commercial employment land needs.

Evaluation of alternatives for meeting commercial land deficit based on site suitability criteria

Table 4-9 identified a deficit for commercial land of 62 vacant suitable acres, on sites ranging from less than 1 acre to 10 acres. The EOA concludes that commercial land demand will be met in the following ways:

- **Commercial center.** Some commercial development can be met through development of a commercial center, which would accommodate businesses that either need larger sites (generally those larger than two acres) or businesses that prefer to locate in a commercial center.
- **Downtown and small commercial sites.** Some commercial development can be met in Junction City's downtown and on other small commercial sites.

Commercial site requirements

The EOA established a need for two types of commercial sites: (1) downtown and small commercial sites; and (2) a commercial center. The following summarizes the site characteristics and provides an overview of the two-prong test established for site characteristics under *Friends of Yamhill County v. City of Newberg*.

The site requirements for **downtown and small commercial sites** are:

1. Sites located with direct access to public streets with capacity or potential capacity to accommodate traffic volumes associated with commercial uses.
    - Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(11) specifically cites the "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 a site characteristic.
    - Attribute has "some meaningful connection with the operation of the industrial or employment use" – Access to public streets with capacity to accommodate traffic volumes is necessary to accommodate necessary freight movement to support commercial development, as well as to provide safe and convenient access for customers and employees.
2. For larger commercial uses, the sites should be located on or within ¼ mile of a major arterial or a State highway.
    - Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(11) specifically cites the "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 a site characteristic. Evidencing that the site characteristic is typical of the desired use, the large commercial uses shown in Table 4-8 are all located within ¼ mile of a major arterial or a State highway.
    - Attribute has "some meaningful connection with the operation of the industrial or employment use" – Commercial businesses require automotive access to function, for delivery of freight or access by customers and employees. This site characteristic helps to minimize the amount of freight traffic on local streets, helping to improve mobility, minimize commercial traffic in residential

neighborhoods, minimize adverse effects on urban land use and travel patterns, and provide for efficient long distance travel, which are all necessary for effective commercial operations.

3. Some commercial uses will require visibility from Highway 99.
    - Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(11) specifically cites "visibility" as a site characteristic.
    - Attribute has "some meaningful connection with the operation of the industrial or employment use" – Many of the desired commercial businesses require from exposure to traffic and storefront view to the road to attract passing motorists and other customers.
4. Located on sites that are able to be efficiently served with water, wastewater, stormwater, and transportation facilities.
    - Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(11) specifically cites the "specific types or levels of public facilities, services or energy infrastructure" as a site characteristic.
    - Attribute has "some meaningful connection with the operation of the industrial or employment use" – Typical uses within commercial developments, such as restaurants, offices, and other similar uses require access to municipal water, municipal sanitary sewer, and electricity/gas. Access to urban services is a requirement of development and any associated City approval. Developing a site with direct access to municipal services is, therefore, substantially more cost-effective than extending municipal services to an unserviced site.
5. Located on sites that are largely free of development constraints, including floodways, flood plains, wetlands, and steep slopes.
    - Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(11) specifically cites "site configuration including shape and topography" as a site characteristic. Reasonably level and well-drained land outside the floodplain is typical of employment areas. Areas not meeting these requirements are constrained and, as a result, may be unsuitable for development. OAR 660-009-0005(2) says: "Development Constraints" means factors that temporarily or permanently limit or prevent the use of land for economic

development. Development constraints include, but are not limited to, wetlands, environmentally sensitive areas such as habitat, environmental contamination, slope, topography, cultural and archeological resources, infrastructure deficiencies, parcel fragmentation, or natural hazard areas. Goal 7 specifically defines "...floods (coastal and riverine)..." as one type of natural hazard.

- Attribute has "some meaningful connection with the operation of the industrial or employment use" – Development within the floodplain may make it more difficult for developers to obtain financing or obtain insurance. In addition, there is increasing uncertainty about development within the floodplain as a result of the settlement agreement that Federal Emergency Management Agency (FEMA) reached with several environmental groups.[16] Under the terms of the settlement agreement, FEMA will now require applicants for certain types of changes to the Oregon floodplain maps to demonstrate that the map change will not cause a loss of habitat. Second, the settlement agreement requires FEMA to initiate a "consultation" under the Endangered Species Act (ESA) with the National Marine Fisheries Service (NMFS) to determine the impacts of the National Flood Insurance Program (NFIP) on fifteen salmon and steelhead species that are listed as threatened or endangered under the ESA. The outcome of this process is still pending, and may result in stringent requirements for development regulations for development in or near the floodplains. Even under existing regulations, commercial developments are required to either elevate or flood-proof structures located in the floodplain, significantly increasing costs or impacting pedestrian and freight access to the site.

6. Located in areas where conflicts with adjacent land uses are minimized.

    - Attribute is "typical of the industrial or employment use" - OAR 660-009-0025(6) strongly encourages cities to manage encroachment and intrusion of incompatible uses with employment uses. Therefore, at least in Oregon, placement

[16] *Audubon Society of Portland, National Wildlife Federation, Northwest Environmental Defense Center, Association of Northwest Steelheaders v. Federal Emergency Management Agency* in the United States District Court, District of Oregon, Case No. 3:09-cv-729-HA

ensuring consistency between adjacent land uses is required, thus "typical." Further, commercial uses are generally compatible with light industrial uses. Small-scale commercial uses are compatible with residential uses and often locate in neighborhoods. Commercial uses may be compatible with agricultural uses, provided that the commercial use does not encroach on the agricultural uses.

- Attribute has "some meaningful connection with the operation of the industrial or employment use" – Commercial uses are able to operate more efficiently, thus more profitably, where they are not in conflict with adjacent land uses that tend to disrupt commercial business activity. Thus, such sites are sought, and conflicts avoided by developers.

7. Located on sites that do not have high value agricultural land.
    - Attribute is "typical of the industrial or employment use" – Commercial businesses typically locate within an urban growth boundary, unless the business is located in an unincorporated area identified as an exception area and/or zoned for rural commercial uses.
    - Attribute has "some meaningful connection with the operation of the industrial or employment use" – Commercial businesses requires land that is zoned appropriately for development. High value agricultural land is likely to be outside of an urban growth boundary, with a zoning designation of exclusive farm use. Commercial uses generally cannot build on high value agricultural land unless the land is brought into an urban growth boundary, consistent with the requirements of Goal 14 and ORS 197.298. Such hurdles make such sites more costly, thus less desirable for development.

The site requirements for a **sub-regional commercial center** are more detailed than for smaller commercial uses. The following summarizes the site characteristics and provides an overview of the two-prong test established for site characteristics under *Friends of Yamhill County v. City of Newberg, 62 Or LUBA 5 (2010), aff'd 240 Or App 738 (2011).*

1. **Site size.** The sub-regional commercial center can provide a substantial amount of the 62 commercial acre land demand, accommodating more than half of the ten sites (44 acres) on sites sized two and ten acres.

    - Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(11) specifically cites "a minimum acreage" as a site characteristic. As noted in the *Commercial and Mixed-Use Development Code Handbook*[17] developed by the Oregon Transportation and Growth Management Program, key characteristics of community-oriented centers are that they typically have an overall area of approximately 10-30 acres, and approximately 150,000 square feet of gross leasable area, depending on the population served. The handbook goes on to note that "The community commercial center should be planned and zoned to accommodate retail, offices, commercial services, entertainment, civic, and institutional uses. Individual uses may range from less than 5,000 square feet, to over 100,000 square feet. Increasingly, these centers are being developed or redeveloped with multiple family housing."

      The commercial centers in Table 4-8 are generally between 20 and 30 acres in size. The mixture of uses in the commercial centers typically includes: one or more anchor stores (e.g., a grocery store or dry goods store), other retail stores, financial services, other personal services, restaurants, and service stations. Several of the commercial centers in Table 4-8 had one or more hotel or motel. The mix of business types and sizes is important to businesses located in the commercial centers. Small specialty stores often locate in commercial centers with larger anchor stores, as a way to attract customers.[18]

      Based on Junction City's economic development vision, the sub-regional commercial center will require approximately

[17] *Commercial and Mixed-Use Development Code Handbook*, Oregon Transportation and Growth Management Program.

[18] Ghosh, Avijit, McLafferty, Sara L.. *Location Strategies for Retail and Service Firms*, Lexington Books, 1987.

35 acres. Table 5-2 shows a sample mixture of businesses and area required for each type of business in the sub-regional commercial center. The uses listed in this table are consistent with the types of uses shown in other commercial centers Table 4-8 and are intended to be illustrative of what might be expected and supported at a sub-regional commercial center in the Junction City area over the 2009 to 2029 period. The specific mixture of uses may be different than those shown in Table 5-2, in response to changes in employment and consumer expenditure patterns over the 20-year forecast period.

Table 5-2. Sample mixture of businesses and site sizes that comprise the sub-regional commercial center

Use/Business	Area Required
Anchor Grocer	6 acres
Dry Goods / Drug Store	3 acres
Home improvement store or other large retail store	6 acres
Hotel	4 acres
Office complex	10 acres
Theater	3 acres
Restaurants	2 acres
Service Station	1 acre
Total	**35 acres**

Source: ECONorthwest, "Area required" based on typical site sizes required by businesses of the type shown in the table.

- Attribute has "some meaningful connection with the operation of the industrial or employment use" – Commercial centers thrive in areas where they are located close to peak flows of traffic and where retail, professional, financial and related services can be conveniently accommodated and be accessible to regional highways, public transportation and parking. The site needs to be large enough to accommodate not only the commercial activities, but also parking, connections to public transportation, and other access to the transportation network.[19] As noted in

[19] These attributes are documented in the literature about siting commercial retail and service centers. For examples of site selection criteria for commercial centers see:
Ghosh, Avijit, McLafferty, Sara L.. *Location Strategies for Retail and Service Firms*, Lexington Books, 1987.

Principles of Urban Retail Planning and Development[20], these types of centers typically have a primary anchor, with 10-15 smaller retailers; the success of the center often depends on the performance of the anchor.

2. **Land ownership.** Sites with a two or fewer owners are necessary to reduce the cost and uncertainty of land assembly.

    - Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(11) specifically cites the "site configuration" as a site characteristic. Developing a commercial center in a site with more than two owners requires negotiating land assembly and purchase from multiple owners. Land assembly is difficult and often costly for a number of reasons. People own land for a variety of reasons, such as desire to develop the land, desire to keep the land undeveloped, desire to sell the land for a profit. Getting land owners to sell land can be difficult, especially if the ownership is legally disputed, such as in the case of inheritance cases. If a landowner is a willing seller, they may have an unrealistic expectation of their land's value, in the context of comparable land values. In addition, one parcel of land may have multiple owners, compounding the issues described above.

      Developers attempting land assembly often have difficulty assembling a site at a cost that makes development economically viable. When assembling land, developers often find that owners of key sites are not willing sellers, have unrealistic expectations of the value of their land, or cannot get agreement among multiple owners to sell the land. As a result, developers of commercial centers typically choose to develop sites with one or two owners.

    - Attribute has "some meaningful connection with the operation of the industrial or employment use" – Increasingly, developers and customers of commercial

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Peiser, Richard B. and Schwanke, Dean. *Professional Real Estate Development: The ULI Guide to the Business*, Dearborn Financial Publishing, Inc. and the Urban Land Institute, 1992.
Schwanke, Dean, et al. *Mixed-Use Development Handbook*, The Urban Land Institute, 2003.
White, John R., Gray, Kevin D., In association with the Urban Land Institute. *Shopping Centers and Other Retail Properties: Investment, Development, Financing, and Management*, John Wiley $ Sons, Inc., 1996.

[20] Gibbs, Robert J (2012). *Principles of Urban Retail Planning and Development.* Hoboken, New Jersey: John Wiley & sons.

centers are seeking an interconnected environment in which public spaces and stores are located in close proximity to each other and connected via internal streets, driveways, and pedestrian walkways that go "to and through" the development. Coordinated development under fewer ownerships makes these types of internal connections more feasible, thereby making the experience more safe, convenient and comfortable.

In addition, the cost of land assembly, in financial terms and in terms of extra time needed for site assembly, can make developing a commercial site with multiple land owners financially infeasible.

3. **Access.** The commercial center must be located within one-quarter mile of a state highway. Traffic from the commercial center should not be routed through residential neighborhoods. The ideal site would be located at a major intersection of state highways or a state highway and an arterial.
    - Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(11) specifically cites the "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 a site characteristic. The commercial centers shown in Table 4-8 are all located on major arterial or a State highway.
    - Attribute has "some meaningful connection with the operation of the industrial or employment use" – This site characteristic helps to minimize the amount of freight traffic on local streets, minimize commercial traffic in residential neighborhoods, improve mobility, minimize adverse effects on urban land use and travel patterns, and provide for efficient long distance travel, which are all necessary for effective commercial operations.[21]

[21] The importance of transportation access is well documented in the real estate development literature. For examples see:
Ghosh, Avijit, McLafferty, Sara L.. *Location Strategies for Retail and Service Firms*, Lexington Books, 1987.
Miles, Mike E., Haney, Richard L., Bernes, Gayle, "Real Estate Development: Principles and Process," The Urban Land Institute, 1997.
Peiser, Richard B. and Schwanke, Dean. *Professional Real Estate Development: The ULI Guide to the Business*, Dearborn Financial Publishing, Inc. and the Urban Land Institute, 1992.
Schwanke, Dean, et al. *Mixed-Use Development Handbook*, The Urban Land Institute, 2003.
White, John R., Gray, Kevin D., In association with the Urban Land Institute. *Shopping Centers and Other Retail Properties: Investment, Development, Financing, and Management*, John Wiley $ Sons, Inc., 1996.

A site located on a state highway at an intersection with another state highway or an arterial is likely to offer several options for site access. In the *book Shopping Centers and Other Retail Properties,*[22] the authors advise locating commercial retail centers on a site with secondary points of access, as well as a primary point of access with excellent traffic flow. In addition, this option allows the City and ODOT to devise an access management plan that best addresses safety issues.

4. **Visibility.** The commercial center must be highly visible from Highway 99.

    - Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(11) specifically cites "visibility" as a site characteristic. The commercial centers shown in Table 4-8 are all highly visible from a state highway.
    - Attribute has "some meaningful connection with the operation of the industrial or employment use" - Many of the desired commercial businesses require exposure to traffic and storefront view to the road in order to attract passing motorists and other potential customers. The importance of locating a commercial center at on a highly visible site is well documented in the real estate development literature.[23]

5. **Unconstrained land.** Sites within a commercial center should not be significantly constrained by the floodway, floodplain, or wetlands.

    - Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(11) specifically cites "site configuration including shape and topography" as a site characteristic. Reasonably level and well-drained land outside the floodplain is typical of employment areas. Areas not meeting

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[22] White, John R., Gray, Kevin D., In association with the Urban Land Institute, "Shopping Centers and Other Retail Properties: Investment, Development, Financing, and Management," John Wiley $ Sons, Inc., 1996.

[23] For example, he following publications all discuss the importance of locating a commercial center at a highly visible site:
Ghosh, Avijit, McLafferty, Sara L.. *Location Strategies for Retail and Service Firms*, Lexington Books, 1987.
Peiser, Richard B. and Schwanke, Dean. *Professional Real Estate Development: The ULI Guide to the Business*, Dearborn Financial Publishing, Inc. and the Urban Land Institute, 1992.
White, John R., Gray, Kevin D., In association with the Urban Land Institute. *Shopping Centers and Other Retail Properties: Investment, Development, Financing, and Management*, John Wiley $ Sons, Inc., 1996.

these requirements are constrained and, as a result, may be unsuitable for development. OAR 660-009-0005(2) says: "Development Constraints" means factors that temporarily or permanently limit or prevent the use of land for economic development. Development constraints include, but are not limited to, wetlands, environmentally sensitive areas such as habitat, environmental contamination, slope, topography, cultural and archeological resources, infrastructure deficiencies, parcel fragmentation, or natural hazard areas. Goal 7 specifically defines "...floods (coastal and riverine)..." as one type of natural hazard.

- Attribute has "some meaningful connection with the operation of the industrial or employment use" - Development within the floodplain may make it more difficult for developers to obtain financing or obtain insurance.[24] In addition, there is increasing uncertainty about development within the floodplain as a result of the settlement agreement that Federal Emergency Management Agency (FEMA) reached with several environmental groups. Under the terms of the settlement agreement, FEMA will now require applicants for certain types of changes to the Oregon floodplain maps to demonstrate that the map change will not cause a loss of habitat. Second, the settlement agreement requires FEMA to initiate a "consultation" under the Endangered Species Act (ESA) with the National Marine Fisheries Service (NMFS) to determine the impacts of the National Flood Insurance Program (NFIP) on fifteen salmon and steelhead species that are listed as threatened or endangered under the ESA. The outcome of this process is still pending, and may result in stringent requirements for development regulations for development in or near the floodplains. Under the current regulations, commercial developments are required to either elevate or flood-proof structures located in the floodplain, significantly increasing costs or impacting pedestrian and freight access to the site.

6. **Topography.** The commercial center site should be relatively flat, with slopes of not more than 5%.

[24] Miles, Mike E., Haney, Richard L., Bernes, Gayle, "Real Estate Development: Principles and Process," The Urban Land Institute, 1997.

- Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(11) specifically cites "site configuration including shape and topography" as a site characteristic. The commercial centers shown in Table 4-8 are all relatively flat.
- Attribute has "some meaningful connection with the operation of the industrial or employment use" – Commercial developments require level floorplates to reduce costs and offer maximum flexibility, as well as level areas to provide for freight access and pedestrian walkways that meet ADA standards. The real estate development literature describes the increases in development costs and other difficulties associated, such as providing with developing a commercial center on a sloped site.[25]

7. **Access to services.** City services should be directly accessible to the site, including sanitary sewer, and municipal water.
   - Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(11) specifically cites the "specific types or levels of public facilities, services or energy infrastructure" as a site characteristic.
   - Attribute has "some meaningful connection with the operation of the industrial or employment use" – Commercial centers require access to municipal water, municipal sanitary sewer, and electricity/gas. Developing a site with direct access to municipal services is substantially more cost-effective than extending municipal services to an unserviced site.[26]

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[25] Ghosh, Avijit, McLafferty, Sara L.. *Location Strategies for Retail and Service Firms*, Lexington Books, 1987.
Miles, Mike E., Haney, Richard L., Bernes, Gayle, "Real Estate Development: Principles and Process," The Urban Land Institute, 1997.
Peiser, Richard B. and Schwanke, Dean. *Professional Real Estate Development: The ULI Guide to the Business*, Dearborn Financial Publishing, Inc. and the Urban Land Institute, 1992.
Schwanke, Dean, et al. *Mixed-Use Development Handbook*, The Urban Land Institute, 2003.

[26] Miles, Mike E., Haney, Richard L., Bernes, Gayle, "Real Estate Development: Principles and Process," The Urban Land Institute, 1997.
White, John R., Gray, Kevin D., In association with the Urban Land Institute. *Shopping Centers and Other Retail Properties: Investment, Development, Financing, and Management*, John Wiley $ Sons, Inc., 1996.

8. **Location relative to Junction City.** The commercial center should be located on the south-side of Junction City (e.g., south of High Pass Road) to provide services needed by workers at the State Hospital and Prison, Grain Millers, and new residential growth occurring in southern Junction City.
    - Attribute is "typical of the industrial or employment use" – Commercial centers typically develop in areas where other growth, especially residential growth, are occurring.
    - Attribute has "some meaningful connection with the operation of the industrial or employment use" – Sites on the southern side of Junction City are more easily accessible to new development and regional customers than sites on the northern side of the City. Junction City's plans for growth are focused on the southern portion of the UGB. In addition, potential customers from west of Junction City have better transportation access to the southern part of Junction City via Highway 36.
9. **Proximity to the UGB.** The commercial center should be located within the existing UGB or on a site that is directly adjacent to the UGB, to make access to the commercial center convenient to residents in Junction City.
    - Attribute is "typical of the industrial or employment use" - Commercial businesses typically locate within an urban growth boundary, unless the business is located in an unincorporated area identified as an exception area and/or zoned for rural commercial uses.
    - Attribute has "some meaningful connection with the operation of the industrial or employment use" - Commercial businesses requires land that is zoned appropriately for development and has access to urban services. Commercial uses generally cannot build on land outside the urban growth boundary (without a Goal 3 exception) or access urban services (without a Goal 11 exception) unless the land is brought into an urban growth boundary, consistent with the requirements of Goal 14 and ORS 197.298.

10. **Surrounding land uses.** Commercial centers are compatible with other commercial uses, light industrial, government, or residential uses.

    - Attribute is "typical of the industrial or employment use" - OAR 660-009-0025(6) strongly encourages cities to manage encroachment and intrusion of incompatible uses with employment uses. Commercial uses are generally compatible with light industrial uses. Small-scale commercial uses are compatible with residential uses and often locate in neighborhoods. Commercial uses may be compatible with agricultural uses, provided that the commercial use does not encroach on the agricultural uses.
    - Attribute has "some meaningful connection with the operation of the industrial or employment use" - Commercial uses are able to operate efficiency where they are not in conflicts with adjacent land uses that could disrupt commercial business activity.

Commercial site evaluation

The analysis of commercial sites is organized by classes of land that correspond to the ORS 197.298 priorities:

- **Redevelopment or redesignation of land within the existing UGB.** This category includes land within the existing UGB.
- **UGB expansion onto exceptions areas.** These lands are areas with existing development and identified as exceptions areas based on county zoning.
- **UGB expansion onto lowest value farmland, with soil Class III and lower value soils.**
- **UGB expansion onto high value farmland, with soil Classes I and II.** 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.

The following analysis is organized by these four land classes.

Redevelopment or redesignation of land within the UGB

The Junction City EOA includes an analysis of vacant employment land within the existing UGB, shown in Table 5-1 above. It is clear from this analysis that Junction City has a limited amount of suitable commercial land available (22 acres). This City's suitable employment land supply is divided into: (1) 14 commercial parcels most of which are smaller than two acres, (2) 14 commercial/residential parcels, all smaller than one acre, (3) 20 industrial sites, and (4) two parcels designated for Professional/Technical (Table 2-7 in the EOA).

The first consideration is use of existing commercial lands within the UGB. The UGB does contain one site that is between 10-19.99 acres in size (Table 2-7 in the EOA). This site is located on the north edge of the Junction City UGB, between Hwy 99 E and Hwy 99W. This site was excluded from further consideration as a redevelopment site to meet the City's commercial needs due to the following site suitability criteria:

- Approximately 15 of the 15.5 acres of the Y-site is in the floodplain.

- The site access has a number of transportation constraints, including designation of the property frontages along Hwy 99E/Hwy 99W as an access management area under the City's Transportation System Plan, limited two-lane traffic in each direction with no turning bays, and increasing congestion at the OR99W/OR99E split. As noted under the 2000 OR 99 Refinement Plan, through the 20 year period, OR 99 will experience a significantly higher traffic demand than the current infrastructure can handle. With no capacity enhancements made, high levels of congestion will be experienced for at least 3 hours during the weekday PM peak period, including vehicle queues in the southbound direction that will block intersections from 1st Avenue through the OR 99W/OR 99 E split. Over a third of this demand will only be passing through with no origin or destination within the City.

- The site is not currently served by urban services (e.g. water and utility) and there are no plans to provide services to this area under the currently adopted Water and Wastewater plans.

Thus, the City concludes that redevelopment of this site is not an appropriate avenue for meeting the commercial land deficit.

As a land use efficiency measure, the Junction City EOA assumes that 12% of new employment will locate in residential areas (126 employees), and that 10% of new employment will not require new built space or vacant land (105 employees; see discussion of Table 4-2 in the previous section). In short, the City assumes that 22% of new employment will not require additional land.

The City also conducted a commercial vacancy survey in the summer of 2010 as part of the Phase II analysis (included as Attachment 8). That survey concluded that the city has a commercial vacancy over about 108,000 square feet, or 11.4%. According to the International Facilities Management Association, the average employee occupies about 400 square feet.[27] Applying this figure, the 105 employees assumed to require no new built space would consume about 42,000 square feet lowering the vacancy rate to less than 7%.

[27] http://www.ifma.org/resources/research/reports/pages/32.htm

Table 5-3. Downtown Junction City commercial vacancy survey, 2010

Total and Vacant Space	Inventoried Buildings	Commercial Buildings	Downtown Inventoried Buildings	Downtown Commercial Buildings
Total Sq. Ft.	1,066,045	949,537	343,811	268,834
Vacant Sq. Ft.	119,979	108,231	56,108	44,359
Vacancy Rate	11.3%	11.4%	16.3%	16.5%
# of buildings	177	146	64	45
# of buildings with vacancy	27	21	16	10
% of buildings with vacancy	15.3%	14.4%	25.0%	15.6%

Source: Scott Turnoy, Junction City Intern, 2010

Based on the above data, the City concludes that the efficiency measures built into the EOA adequately address infill and redevelopment and that no additional capacity exists through this means.

The second consideration is redesignation of lands within the UGB to accommodate the need. The City finds the following with respect to redesignation of lands within the UGB:

- Redesignation of residential lands is not viable because (1) existing residential lands in the UGB do not meet the site requirements for commercial land, and (2) redesignation of residential sites would potentially create a larger deficit of land for residential purposes.
- Redesignation of industrial sites to commercial uses is inconsistent with the City's economic development vision, which includes maintaining the current inventory of industrial sites to provide opportunities for industrial uses. Moreover, the City recently evaluated its industrial land need supply and amended the UGB to meet industrial land needs.

  In addition, the City wants to retain its base of industrial land, especially industrial land in sites larger than 50 acres for future industrial uses. Junction City's has one site larger than 50 acres, which fits the definition of prime industrial land in OAR 660-009-0005(8): "land suited for traded-sector industries as well as other industrial uses providing support to traded-sector industries. Prime industrial lands possess site characteristics that are difficult or impossible to replicate in the planning area or region. Prime industrial lands have necessary access to transportation and freight infrastructure, including, but not limited to, rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes." OAR

660-009-0020(6) strongly encourages cities to adopt policies to preserve prime industrial land.

Finally, much of Junction City's remaining vacant industrial land is located east of Highway 99, between two railroad tracks. These sites are unsuitable for redevelopment for commercial uses because accessing them requires crossing the rail line. In addition, their configuration, which is long and thin, makes them undesirable for commercial uses.

- Redesignation of the 85-acre Professional Technical site for commercial uses is inappropriate because (1) the site does not meet the suitability criteria for the sub-regional commercial center, and (2) the City will redesignate the site for residential uses as part of the package of plan amendments that accompany this UGB proposal.

Thus, the City concludes that redesignation of existing sites is not an appropriate avenue for meeting the commercial land deficit.

UGB expansion onto exceptions areas

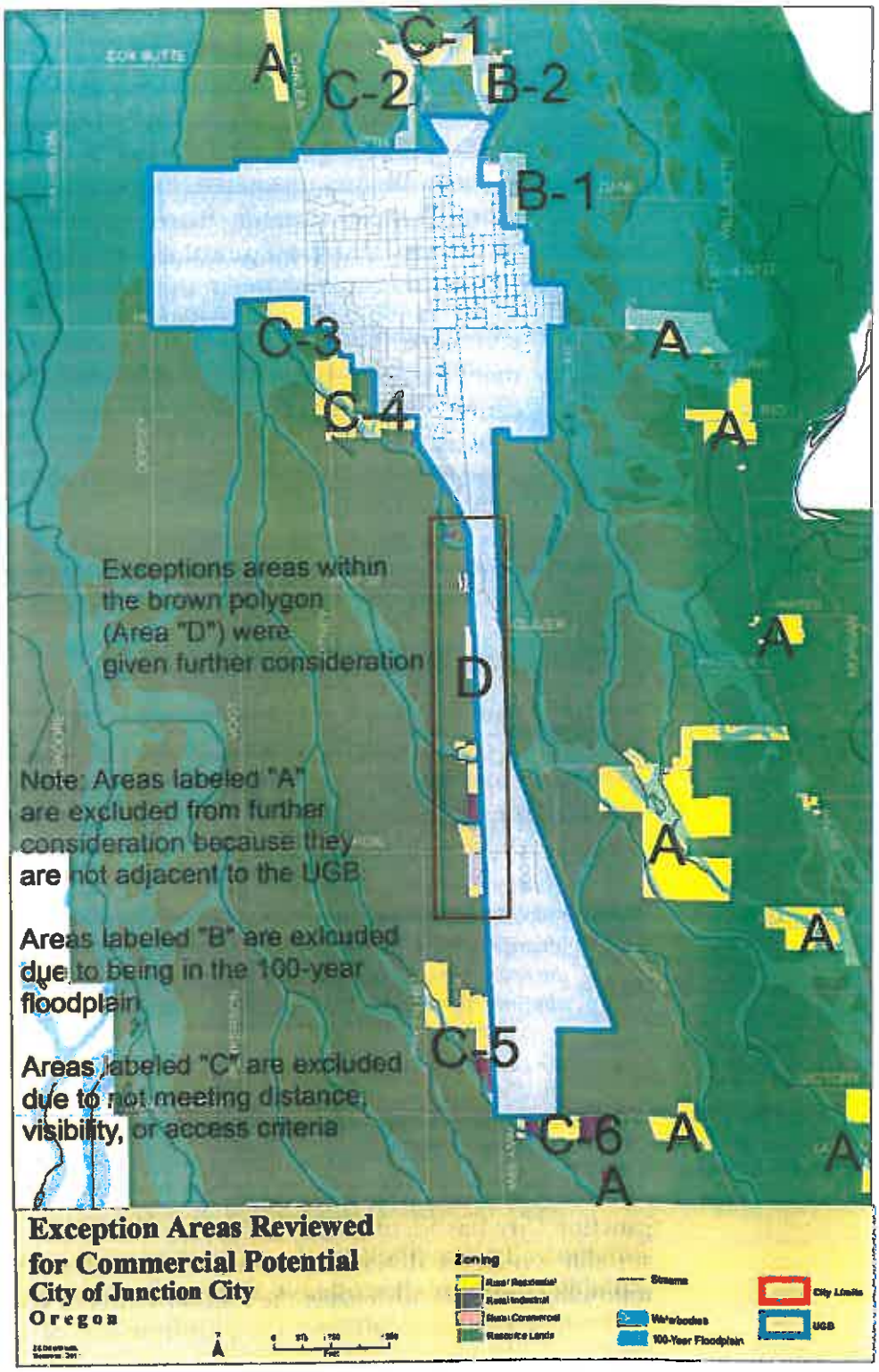
Exceptions areas are second priority in the ORS 197.298 priority scheme (Junction City does not have urban reserves). Based on the siting criteria for commercial lands, the City evaluated all exceptions areas adjacent to the UGB for inclusion in the UGB. OAR 660-024-0060 sections (5) and (6) provide additional guidance:

> *(5) If a local government has specified characteristics such as parcel size, topography, or proximity that are necessary for land to be suitable for an identified need, the local government may limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298.*
>
> *(6) The adopted findings for UGB adoption or amendment must describe or map all of the alternative areas evaluated in the boundary location alternatives analysis. If the analysis involves more than one parcel or area within a particular priority category in ORS 197.298 for which circumstances are the same, these parcels or areas may be considered and evaluated as a single group.*

Junction City has identified specific characteristics for commercial site suitable which are described in Section 4 of this findings report. The following analysis addresses the requirements of section (6).

Map 5-1 shows the location of lands included in this analysis. Lands with the cross-hatching were determined to be unsuitable for further review because the failed to meet one or more of the site criteria for commercial lands.

Map 5-1. Exceptions areas reviewed against commercial suitability criteria



Map 5-1 shows four classes of exceptions lands that the city considered. Areas labeled "A", "B", or "C" on the map were excluded because they were determined to be unsuitable under one or more of the site criteria for commercial lands. The following findings provide more detail concerning the evaluation of exceptions areas.

Areas in Group "A"

Areas in group "A" were eliminated due to the fact that they are not adjacent to the Junction City UGB. The lack of adjacency, however, is not in itself enough to eliminate these lands from further consideration. OAR 660-024-0060(4) states:

> *(4) In determining alternative land for evaluation under ORS 197.298, "land adjacent to the UGB" is not limited to those lots or parcels that abut the UGB, but also includes land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency.*

The key phrase is "...has reasonable potential to satisfy the identified need deficiency." The City finds these lands unsuitable for commercial development for the following reasons:

- All of the lands in Group A are more than ¼ mile from Highway 99 and as such do not meet the suitability criteria for commercial lands.
- All of the lands in Group "A" are more than ¼ mile from the UGB. This makes these lands difficult and expensive to service as well as difficult to access.
- With the exception of one small industrial site south of the existing UGB, all of the lands in Group "A" are zoned for rural residential use and having pre-existing residential development. Commercial activities are incompatible with the existing residential development.
- Some areas in Group "A" are constrained by the 100-year floodplain as mapped by the Federal Emergency Management Agency (FEMA) on their Flood Insurance Rate Maps (FIRM).

Areas in Group "B"

Goal 9 recognizes that some land attributes make land unsuitable for development. OAR 660-009-0005(2) states:

> "Development Constraints" means factors that temporarily or permanently limit or prevent the use of land for economic development. Development constraints include, but are not limited to, wetlands, environmentally sensitive areas such as

habitat, environmental contamination, slope, topography, cultural and archeological resources, infrastructure deficiencies, parcel fragmentation, or natural hazard areas.

Areas in Group "B" were excluded from further consideration because of the presence of natural hazards. More specifically, the majority of land within the areas is within the 100-year floodplain as mapped by the Federal Emergency Management Agency (FEMA) on their Flood Insurance Rate Maps (FIRM). Junction City has determined that areas that are within the 100-year floodplain are not suitable for development as employment sites.

Map 5-2 shows the two areas in Group B along with the extent of the 100-year floodplain. Junction City makes the following findings related to areas in Group "B":

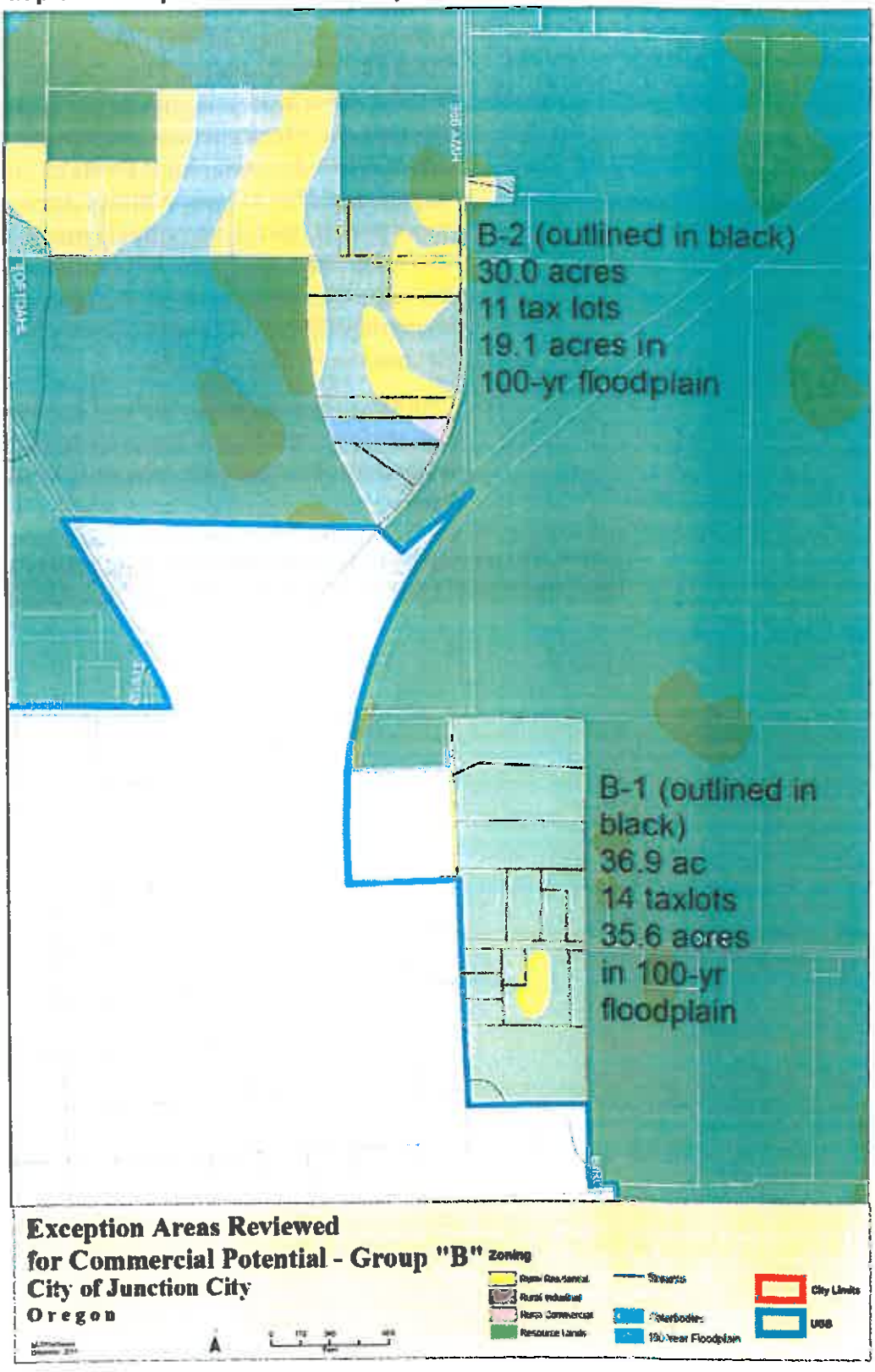
- Area B-1.
    - This area includes 36.9 acres in 14 tax lots. All of the tax lots are zoned Rural Residential. A total of 35.6 acres of the 36.9 acres are within the 100-year floodplain.
    - The area has a number of transportation constraints, including limited capacity of W 18th Street, which is currently not proposed for modernization as part of the City's Transportation System Plan, increasing congestion at the OR99W/OR99E split, as well as mobility limitations due to the railroad and limited crossings that exist or are likely to exist in the future due to ODOT Rail Division's policies on railroad crossings.
    - The site is not currently served by urban services (e.g. water and utility) and there are no plans to provide services to this area under the currently adopted Water and Wastewater plans.
- Area B-2.
    - This area includes 30.0 acres in 11 tax lots. Ten of the tax lots are zoned Rural Residential; one is zoned Rural Commercial (2.4 acres). A total of 19.1 of the 30 acres are within the 100-year floodplain.
    - The area has a number of transportation constraints, including designation of the property frontages along Hwy 99E/Hwy 99W as an access management area under the City's Transportation System Plan, limited two-lane traffic in each direction with no turning bays, and increasing

congestion at the OR99W/OR99E split. As noted under the 2000 OR 99 Refinement Plan, through the 20 year period, OR 99 will experience a significantly higher traffic demand than the current infrastructure can handle. With no capacity enhancements made, high levels of congestion will be experienced for at least 3 hours during the weekday PM peak period, including vehicle queues in the southbound direction that will block intersections from 1st Avenue through the OR 99W/OR 99 E split. Over a third of this demand will only be passing through with no origin or destination within the City.

- The site is not currently served by urban services (e.g. water and utility) and there are no plans to provide services to this area under the currently adopted Water and Wastewater plans.

The City of Junction determines these exceptions areas to be unsuitable for commercial development for the reasons stated above.

Map 5-2. Exceptions areas in Group "B" eliminated due to flood constraints



Areas in Group "C"

Areas in Group "C" are areas that were excluded from further consideration due to site suitability criteria. The City established the following criteria for commercial sites:

- Sites located with direct access to public streets with capacity or potential capacity to accommodate traffic volumes generated by commercial uses.
- Sites should be located on or with ¼ mile of a major arterial or a State highway.
- Some commercial uses will require visibility from Highway 99.
- Located on sites that are able to be efficiently served with water, wastewater, stormwater, and transportation facilities.
- Located on sites that are largely free of development constraints, including floodways, flood plains, wetlands, and steep slopes.
- Located in areas where conflicts with adjacent land uses are minimized.

The following findings apply the above suitability criteria for general commercial lands to areas in group **"C"**.

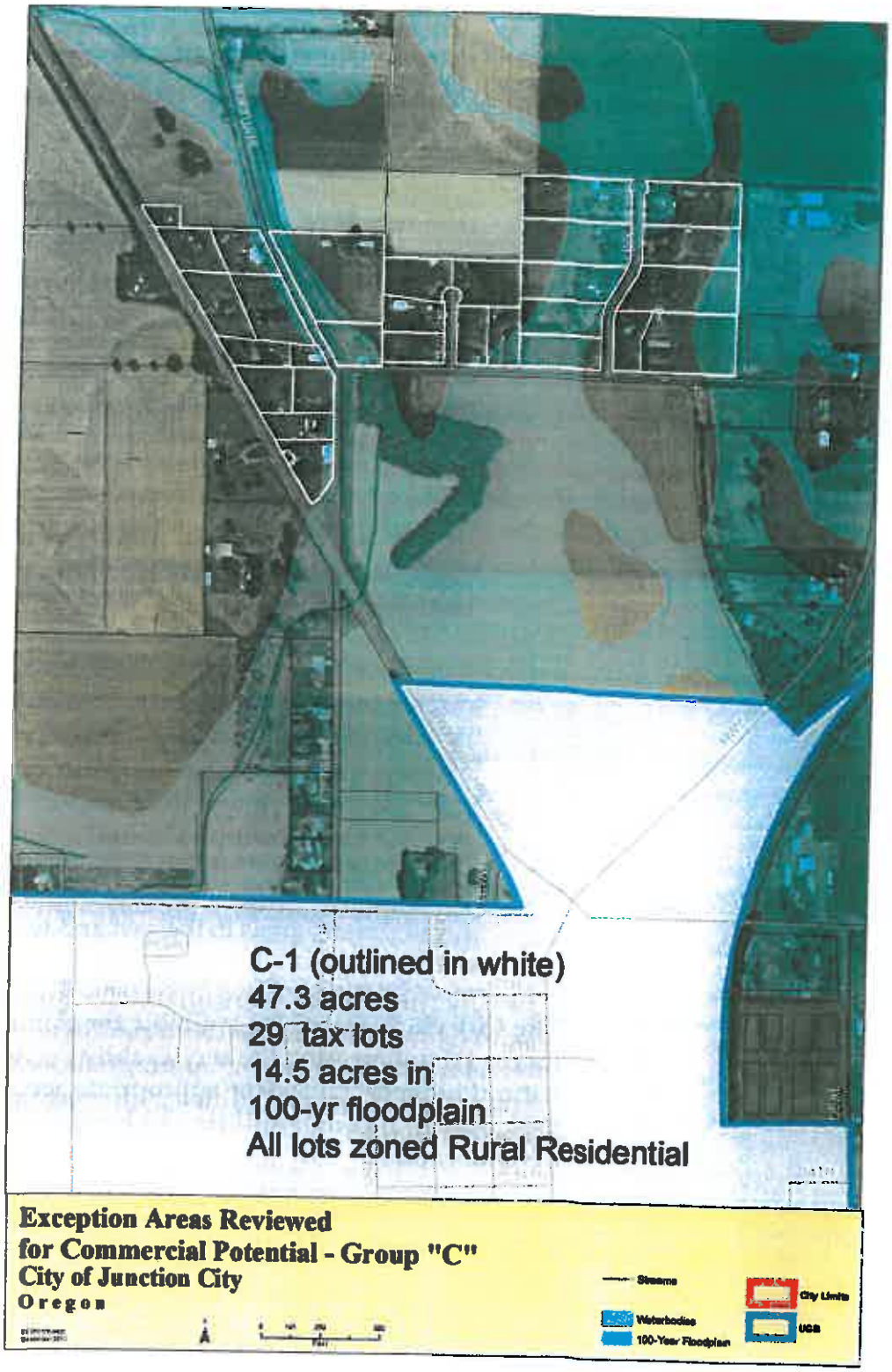
- Area C-1: This area contains 29 tax lots with 47.3 acres (Map 5-3). All tax lots in the area are zoned Rural Residential. With respect to the suitability criteria:
    - Criteria 1: The area has auto access to Highway 99 E through Link Lane and Highway 99 W through Toftdahl road. Given that these are unimproved intersections, significant traffic volumes may create safety concerns and would likely require improvements to address capacity and safety issues.
    - Criteria 2: The majority of the area is within ¼ mile of Highway 99E or Highway 99W.
    - Criteria 3: Portions of the area are visible from Highway 99.
    - Criteria 4: The study area does not currently have municipal water, wastewater or stormwater service. The closest services are at the Safeway shopping center at the "Y", a minimum of 0.4 miles from the closest tax lots in the study area. Transportation access would require expensive improvements to support commercial level traffic volumes.

- Criteria 5: Approximately 14.5 of the 47.3 acres are within the 100-year floodplain.

- Criteria 6: The study area has several inherent conflicts with existing uses. First, the study area includes considerable residential development. In fact, every tax lot that is zoned Rural Residential has pre-existing improvements; most have single-family dwellings—many have additional structures. In short, the residential development constitutes a rural neighborhood. In addition to residential development, the area surrounds a farm parcel with Class 1 and 2 soils to the south and additional parcels with Class 1 and 2 soils to the north, east and west.

The City finds area C-1 unsuitable for commercial development due to (1) not meeting the serviceability criteria, (2) presence of natural hazards, and (3) incompatibilities with existing residential neighborhoods.

Map 5-3. Exceptions areas in area C-1 eliminated due to not meeting commercial suitability criteria



- Area C-2: This area contains 11 tax lots with 30.0 acres (Map 5-4). All tax lots in the area are zoned Rural Residential. With respect to the suitability criteria:

    - Criteria 1: The area has auto access by Toftdahl Lane via 18th Avenue. The does not have direct access from Highway 99. Highway 99 access via Toftdahl Road was blocked at some point.

    - Criteria 2: The area is within ¼ mile of Highway 99E or Highway 99W.

    - Criteria 3. The area is visible from Highway 99.

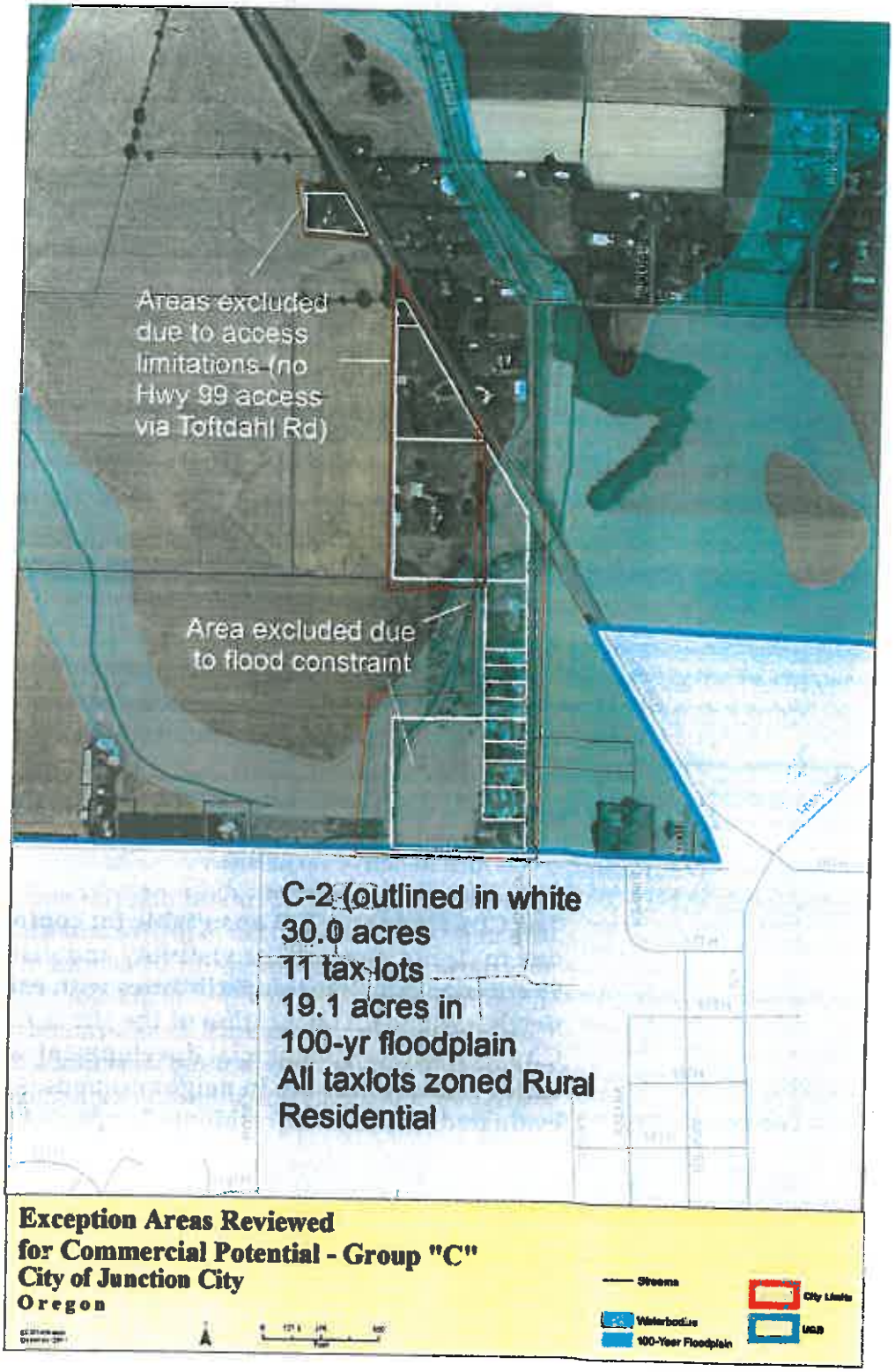
    - Criteria 4: The study area does not currently have municipal water, wastewater or stormwater service. The closest services are at 18th Avenue and would need to be extended northward into the site.

    - Criteria 5: Approximately 19.1 of the 30.0 acres are within the 100-year floodplain. Portions of the study area not impacted by the floodplain are the furthest from the UGB and municipal services.

    - Criteria 6: The study area has several inherent conflicts with existing uses. First, the study area includes considerable residential development. In fact, nine of the 11 tax lots pre-existing improvements; most have single-family dwellings—many have additional structures. In short, the residential development constitutes a rural neighborhood that extends northward along Toftdahl Road. In addition to residential development, areas to the east and west are in active farm use.

    The City finds area C-2 unsuitable for commercial development due to (1) not meeting the serviceability criteria, (2) presence of natural hazards, (3) lack of appropriate access for commercial uses, and (4) incompatibilities with existing residential neighborhoods.

Map 5-4. Exceptions areas in area C-2 eliminated due to not meeting commercial suitability criteria



- Area C-3: This area contains 9 tax lots with 20.4 acres (Map 5-5). All tax lots in the area are zoned Rural Residential. The area is located southwest of the existing UGB north of High Pass Road. With respect to the suitability criteria:

    - Criteria 1: The area has auto access via High Pass Road and Oaklea Road. Traffic impacts from commercial uses would likely require improvements to one or both of these roads.

    - Criteria 2: The area is within 0.85 miles from Highway 99.

    - Criteria 3: The area is not visible from Highway 99.

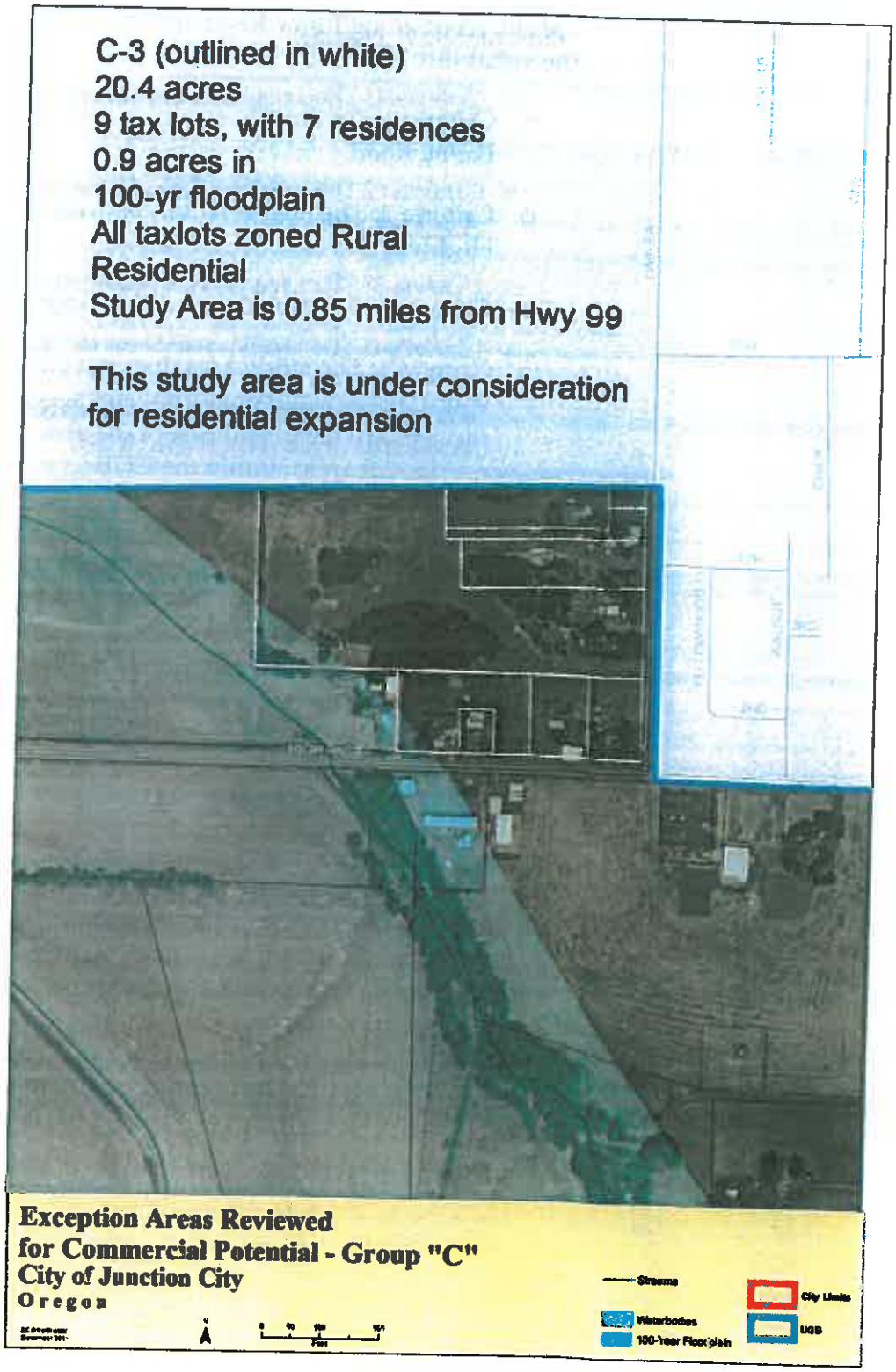
    - Criteria 4: The study area does not currently have municipal water, wastewater or stormwater service. The closest services are north of High Pass Road and East of Oaklea Road and would need to be extended northward into the site.

    - Criteria 5: Approximately 0.9 of the 20.4 acres are within the 100-year floodplain. Western portions of the study area have some areas of hydric soils which are highly correlated with wetlands.

    - Criteria 6: The study area has conflicts with existing uses. First, the study area includes residences clustered along High Pass road – the most obvious location for commercial development. Additional residences are located along Oaklea Road. Areas to the south and west of the study area are in active farm use.

  The City finds area C-3 unsuitable for commercial development due to (1) not meeting the visibility and distance from Highway 99 criteria, and (2) incompatibilities with existing residential neighborhoods. The location of the site is inconsistent with the City's vision for commercial development which does not include major commercial uses in neighborhoods. Moreover, the City evaluated this area for residential expansion of the UGB.

Map 5-5. Exceptions areas in area C-3 eliminated due to not meeting commercial suitability criteria



- Area C-4: This area contains 36 tax lots with 77.5 acres (Map 5-6). All tax lots in the area are zoned Rural Residential. The area is located southwest of the Junction City UGB. The exceptions areas are clustered along Piney Road and Bailey Road. With respect to the suitability criteria:

    - Criteria 1: The area has auto access via Piney Road and Bailey Road.

    - Criteria 2: The area is within between 0.3 and 0.7 miles of Highway 99.

    - Criteria 3: The area is not visible from Highway 99.

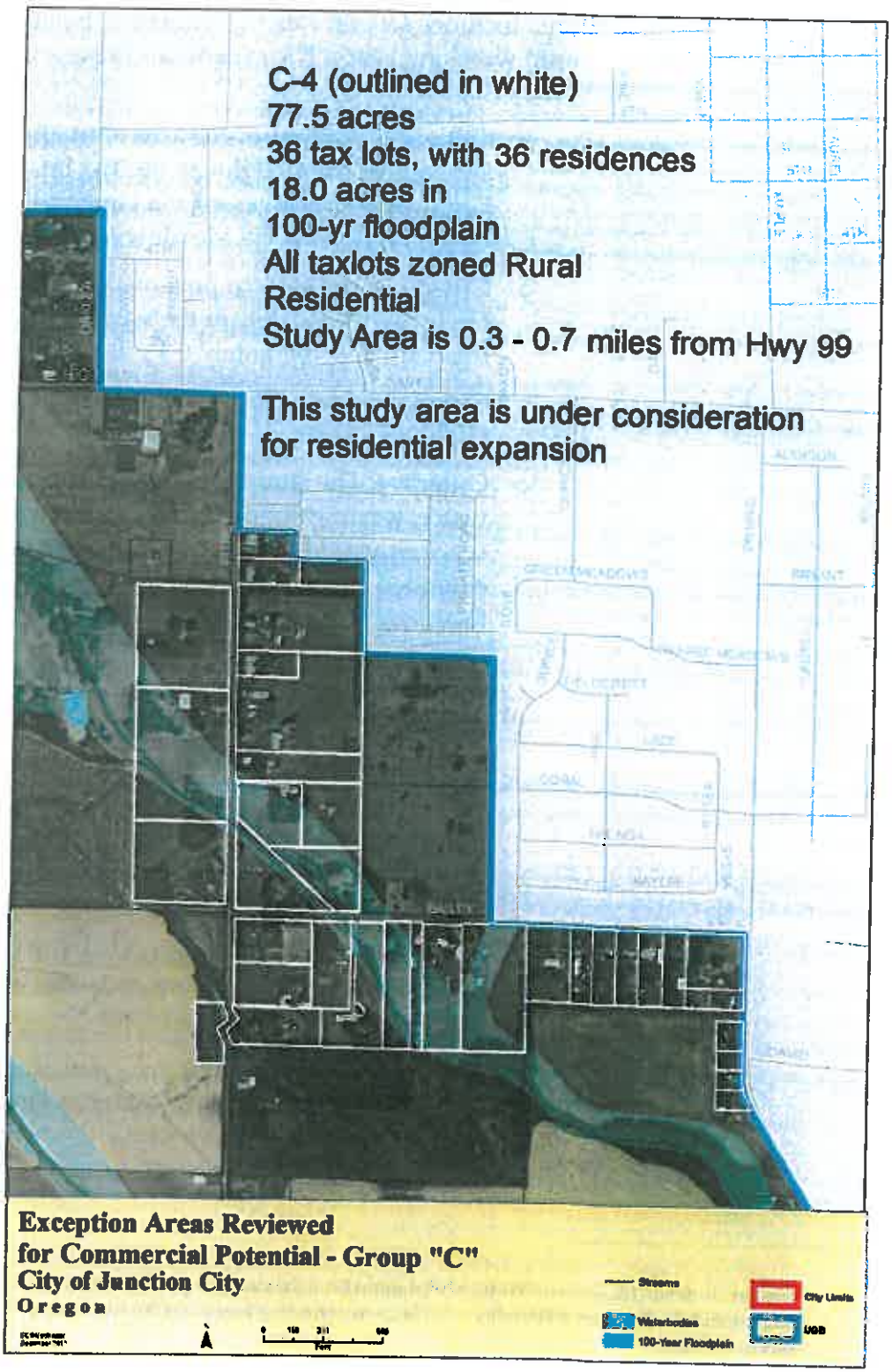
    - Criteria 4: The study area does not currently have municipal water, wastewater or stormwater service. The closest services are north and east of the area and service existing residential areas within the UGB.

    - Criteria 5: Approximately 18.0 of the 77.5 acres are within the 100-year floodplain. The area also includes some hydric soils, which generally follow the areas of flood hazard.

    - Criteria 6: The study area has existing rural residential development on every tax lot. Taxlots in the southeast portion of the study area are more density clustered along Bailey Road and Prairie Road. These taxlots are smaller—generally about an acre in size. Areas to the south and west are in active farm use.

- **The City finds area C-3 unsuitable for commercial development due to (1) not meeting the visibility and distance from Highway 99 criteria, and (2) incompatibilities with existing residential neighborhoods. The location of the site is inconsistent with the City's vision for commercial development which does not include major commercial uses in neighborhoods. Moreover, the City evaluated this area for residential expansion of the UGB and is proposing to add a portion of the area to the UGB for residential use.**

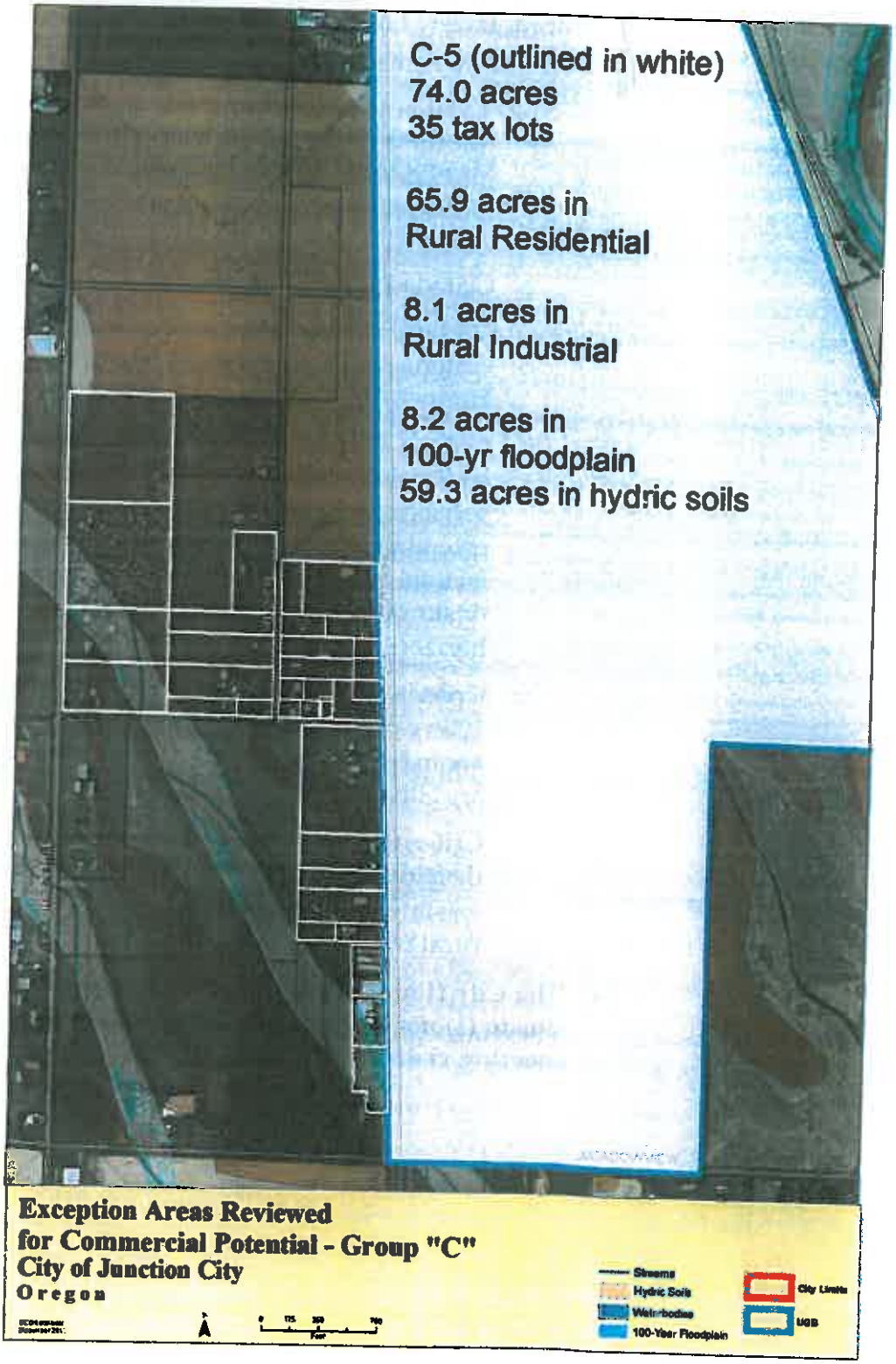
Map 5-6. Exceptions areas in area C-4 eliminated due to not meeting suitability criteria



- Area C-5: This area contains 35 tax lots with 74.0 acres (Map 5-7). 8.1 acres of the site are zoned Rural Industrial. The area is located west of the Junction City UGB about 3 miles from downtown. The area includes several existing industrial businesses, as well as three auto wrecking years. The exceptions areas are clustered along Piney Road and Bailey Road. With respect to the suitability criteria:
    - Criteria 1: Portions of the area abut Highway 99 and have auto access from Highway 99. Tax lots not abutting Highway 99 are accessed via Greenhill Road. Access to Greenhill Road is via Meadowview Lane.
    - Criteria 2: The eastern portion of the study area abuts Highway 99. Tax lots in the western portion along Greenhill Road are approximately 0.4 miles from Highway 99.
    - Criteria 3: Areas along Highway 99 are visible from the Highway. Areas along Greenhill Road are not.
    - Criteria 4: The study area does not currently have municipal water, wastewater or stormwater service. The closest services are at Highway 99 and Milliron road and were extended to that location for the purpose of serving the state facilities. The City has no plans to extend water, wastewater, or stormwater services to the site in the 20-year planning horizon.
    - Criteria 5: Approximately 8.2 of the 74.0 acres are within the 100-year floodplain. A large portion of the study area—59.3 acres—has hydric soil types. According to the Department of State Lands (DSL), hydric soil types are highly correlated with wetlands.[28]
    - Criteria 6: The study area has considerable existing development. The auto wrecking yards and other existing businesses are viable businesses and would essentially amount to redevelopment sites. The site also has some existing rural residences.
- **The City finds area C-5 unsuitable for commercial development due to (1) not meeting the serviceability criteria, and (2) not meeting the land constraint criteria.**

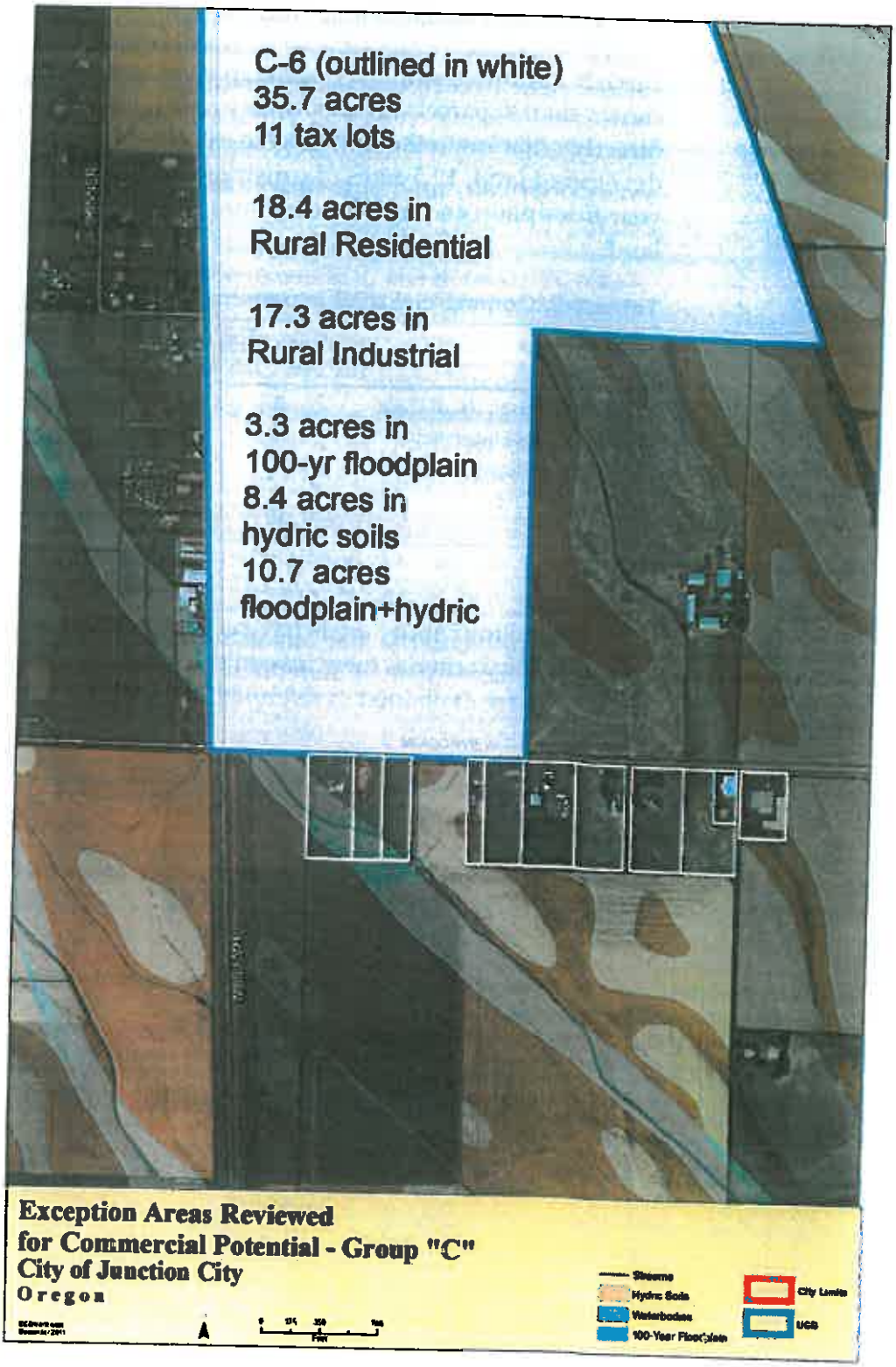
[28] Letter from Janet C. Morlan, Wetlands Program Coordinator, Oregon Department of State Lands to Kay Bork dated January 7, 2009: "Because wetlands on the land surrounding Junction City tend to correspond very with the NRCS soils mapping, mapped hydric soils provide a very good estimate of the location and extent of probable wetlands." See Attachment 7

Map 5-7. Exceptions areas in area C-5 eliminated due to not meeting suitability criteria



- Area C-6: This area contains 11 tax lots with 35.7 acres (Map 5-8). About 17.3 acres of the site are zoned Rural Industrial. The area is located south of the Junction City UGB east of Highway 99 along Meadowview Lane. The area includes several existing industrial businesses, as well some rural residences. With respect to the suitability criteria:
    - Criteria 1: Transportation access to the area is via Meadowview Lane which can be accessed via Highway 99 or Prairie Road. The Highway 99/Meadowview Lane intersection is non-signalized.
    - Criteria 2: The study area is between 0.1 mile and 0.65 miles of Highway 99.
    - Criteria 3: The study area is not directly visible from Highway 99.
    - Criteria 4: The study area does not currently have municipal water, wastewater or stormwater service. The closest services are at Highway 99 and Milliron road and were extended to that location for the purpose of serving the state facilities. The City has no plans to extend water, wastewater, or stormwater services to the site in the 20-year planning horizon.
    - Criteria 5: Approximately 3.3 of the 35.7 acres are within the 100-year floodplain. About 8.4 acres within the study area are in hydric soil types. A total of 10.7 acres of the study area are either in the floodplain or hydric soil types.
    - Criteria 6: The study area has considerable existing development. All of the tax lots zoned Rural Industrial have existing businesses located on them. All of the tax lots zoned rural residential have existing residences.
- **The City finds area C-6 unsuitable for commercial development due to (1) not meeting the serviceability criteria and (2) not meeting visibility criteria.**

Map 5-8. Exceptions areas in area C-6 eliminated due to not meeting suitability criteria



Areas in Group "D"

The remaining exceptions areas were highlighted on Map 5-3 as Group "D". The City evaluated four study areas in Group "D" (see Map 5-9).

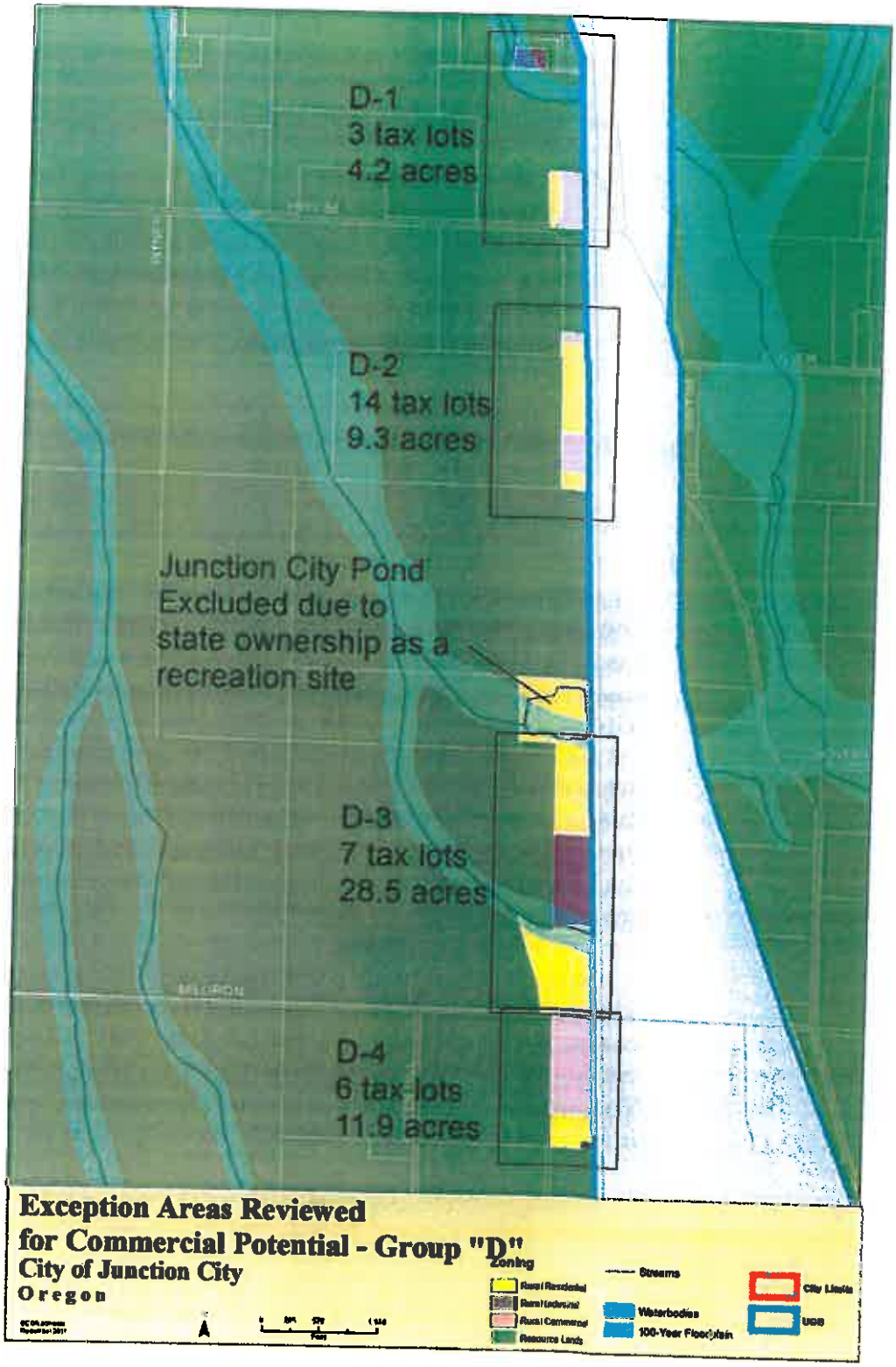
Table 5-2 shows a summary of exceptions areas in Group D. Table 5-2 shows that 30 parcels in exceptions areas with 53.9 acres of land are directly adjacent to the UGB. These exceptions areas have 26.6 acres of developed land, 19.5 acres of constrained land (including areas in the 100-year floodplain and hydric soils), and 7.7 acres of suitable commercial land.

Table 5-2. Commercial UGB expansion study areas

		Development Status			
Study Area	Tax Lots	Developed	Constrained	Suitable	Total Acres
D-1. Prairie Road (N. of 99/36	3	2.7	0.3	1.2	4.2
D-2. S. of 99/36 Intersection	14	8.3	1.0	0.0	9.3
D-3. N. of Milliron	7	4.6	17.3	6.6	28.5
D-4. S. of Milliron	6	11.0	1.0	0	11.9
Total	**30**	**26.6**	**19.5**	**7.7**	**53.9**

Because the four study areas have common characteristics with respect to the suitability criteria, they are evaluated together. Where differences exist, they are explained in reference to the specific study area.

Map 5-9. Exceptions areas in Group "D"



- Criteria 1: With one exception, all of the tax lots abut Highway 99. Access to tax lots in Group D is either via Highway 99 or Highway 36.
- Criteria 2: All taxlots in Group D are within ¼ mile of Highway 99.
- Criteria 3: All taxlots in Group D are visible from Highway 99.
- Criteria 4: All taxlots in Group D have access to water and wastewater service. The City and the State partnered to extend water and sewer service south to Milliron Road for the proposed state facilities. The lines are located along Highway 99 and occupy easements in the portions of taxlots abutting the Highway 99 right-of-way in many instances.
- Criteria 5: About 19.5 of the 53.9 acres are constrained either by the 100-year floodplain, hydric soils, or both.
- Criteria 6: The study area has considerable existing development. The uses are generally commercial or rural residential uses.

The City finds study areas in Group "D" suitable for commercial uses based on the commercial suitability criteria. Specifically, the exceptions areas meet the locational criteria (distance and visibility), the access criteria (proximity to Highway 99), and serviceability criteria.

Based on the above analysis, the City proposes to include 53.9 acres in this class to be designated for commercial uses. The area includes 7.7 suitable acres and other underutilized sites that can be redeveloped over the planning period. The City assumes that 12 of the 26.6 developed acres will be available for commercial development and will redevelop over the planning period.

These exceptions areas combined meet 19.7 acres of the City's 62-acre commercial land deficit. The City finds that it can meet 19.7 acres of its commercial needs on exceptions areas. This leaves a deficit of 41.3 acres. That deficit is consistent with the sub-regional commercial site identified in the City's economic development strategy.

UGB expansion lowest value farmland

The next class of lands evaluated were parcels with low-value farmland. Generally, class I and II soils are considered high-value farmland. Some class III soil types are identified in OAR 660-033-0020(8) are considered high-value farmland. None of the Class III soils are on the OAR 660-033-0020(8) list of high-value soil types. High-value farmland is addressed in the next section. This section focuses on low-value farmland.

Map 5-10 shows soil classification of resource land within one mile of the Junction City UGB. Based on the site requirements for a sub-regional commercial center, the City focused this analysis on lands that are within ¼ mile of Highway 99. Map 5-10 outlines areas within ¼ mile of Highway 99 as well as the exceptions areas that were evaluated in the previous section.

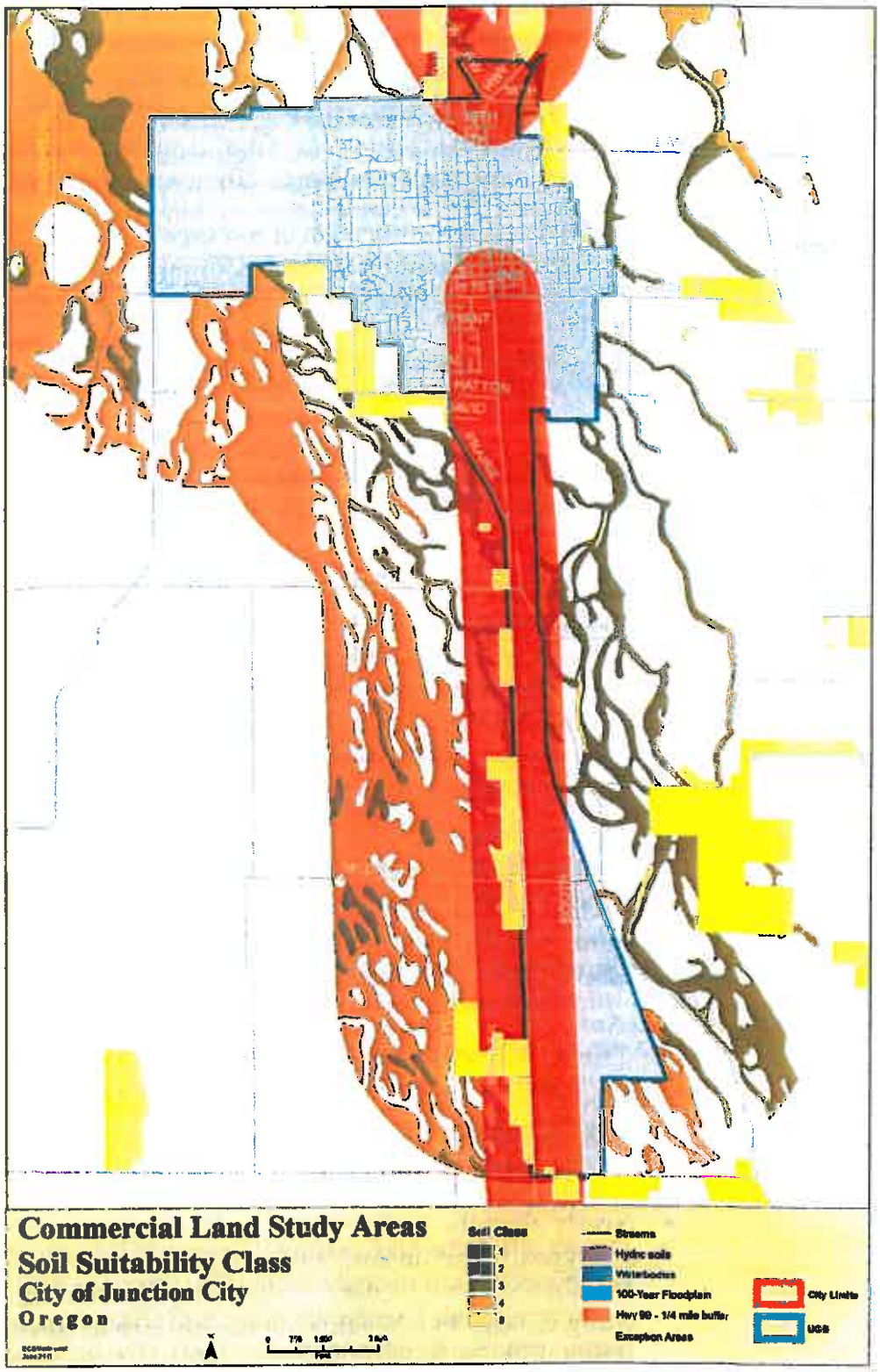
Areas in white outside the UGB are in class I or II soils. The City makes the following findings with respect to the review of lowest value farmland.

1. Areas east of Highway 99 tend to be dominated by Class I and II soils. Moreover, most of these lands are more than ¼ mile from Highway 99, have limited to no visibility from Highway 99. Considerable areas east of Highway 99 are also constrained by the 100-year floodplain. Some areas east of Highway 99 do not meet the serviceability criteria. **For these reasons, the City finds low value farmland east of Highway 99 unsuitable.**
2. Areas at the northern end of the Junction City UGB that are within ¼ mile of Highway 99E or Highway 99W are primarily Class I or II soils. No reasonable alternatives exist to meet the 41.3-acre deficit on lower productivity soils in this study area. **For this reason, Junction City finds low-value farmland at the northern end of the UGB unsuitable.**
3. Areas between the Junction City Pond and Meadowview Lane are Primarily in Class III and IV soils and are potentially suitable.

The City conducted further analysis for lands south of the Junction City Pond to Meadowview Lane. It makes the following findings with respect to these lands.

- Nearly all of the lands within ¼ mile of Highway 99 are in hydric soil types. Based on analysis by DSL, these lands are likely to contain regulated wetlands (Map 5-11). **Based on commercial siting criteria #4 (sites that are largely free of development constraints, including floodways, flood plains, wetlands, and steep slopes), the City finds these lands unsuitable for inclusion for Commercial Development.**

Map 5-10. Lands in Class III+ soil productivity classes



Map 5-11. Analysis of lands between Junction City Pond and Meadowview Lane

Commercial Land Study Areas
Soil Suitability Class
City of Junction City
Oregon
Soil Class
Hydric soils
Waterbodies
100-Year Floodplain
Exception Areas
City Limits
UGB

UGB expansion high value farmland

The previous section concluded that the City could not meet any of its Commercial land need on low-value farmland. Thus, it must review high-value farmland for the remainder of the land need.

The City made the following finding in the previous section related to lands east of Highway 99:

1. Areas east of Highway 99 tend to be dominated by Class I and II soils. Moreover, most of these lands are more than ¼ mile from Highway 99, have limited to no visibility from Highway 99. Considerable areas east of Highway 99 are also constrained by the 100-year floodplain. **For these reasons, the City finds low value farmland east of Highway 99 unsuitable.**

Applying the locational criteria for commercial lands (Criteria 2 and 3), the City concludes that lands east of Highway 99 are not suitable for inclusion to meet commercial needs.

The City divided the remaining lands in this class into five study areas. Map 5-12 shows the five study areas. Table 5-5 summarizes soils in the five study areas by productivity class.

Table 5-5. High-value study area soils summary

	Acres by Soil Class					
Study Area	I	II	III	IV	V+	Total
HV 1	55.8	12.2	14.0	0.0	0.0	82.0
HV 2	38.6	19.9	22.3	0.0	1.6	82.4
HV 3	9.8	23.9	6.8	0.0	0.0	40.6
HV 4	5.3	19.7	5.2	0.1	0.0	30.2
HV 5	11.6	31.1	8.6	3.1	0.0	54.4

Table 5-6 summarizes suitable acres by high-value study area. The city finds:

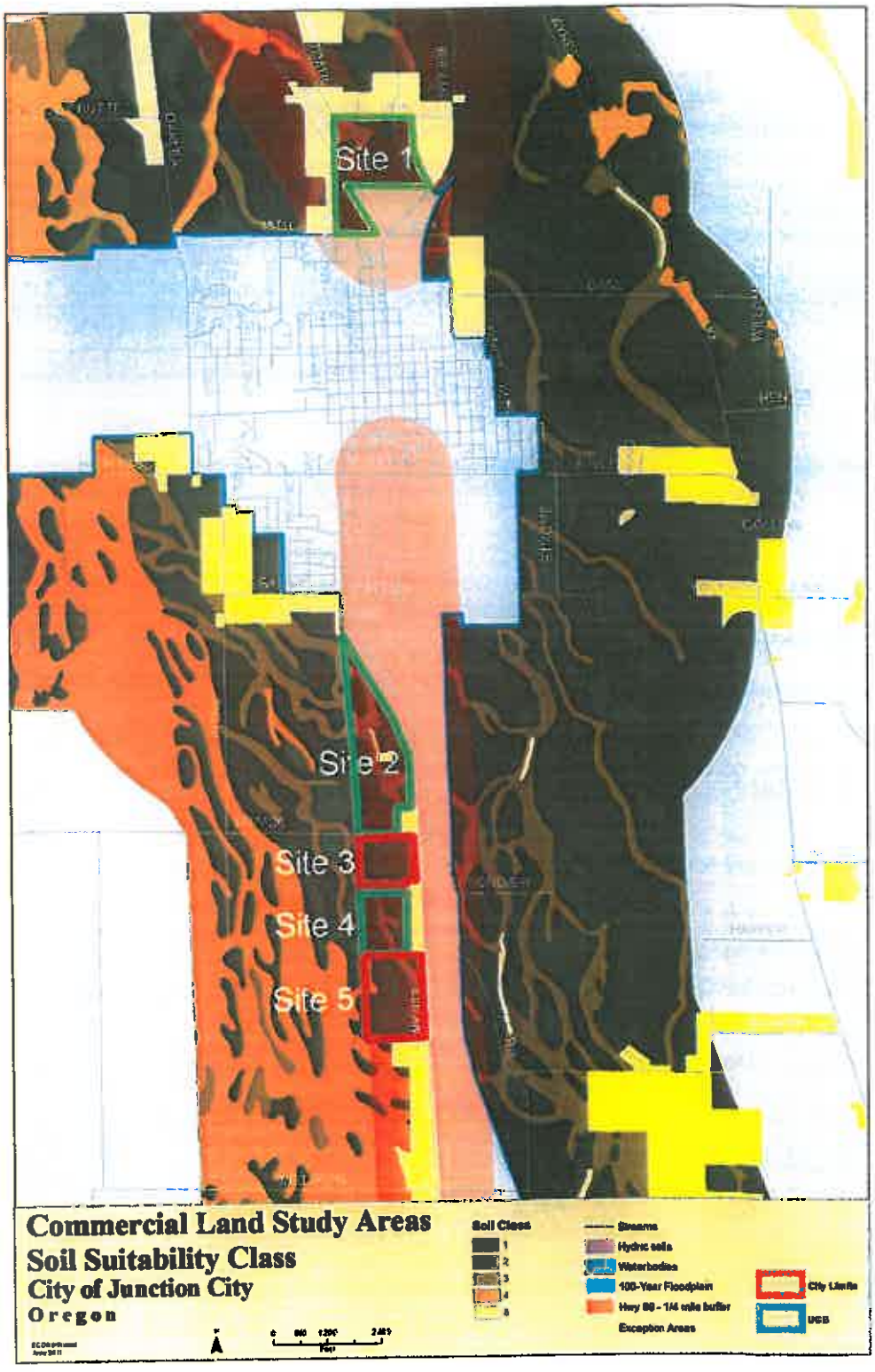
- Areas 1 and 2 are more parcelized than the other areas.
- Area 1 has significant areas that are unsuitable due primarily to floodplains. Only 11% of the area is suitable.
- Areas 2 and 4 have pre-existing development. Area 2 includes several residences and an industrial business. Area 4 includes a farm residence and several supporting structures.

- Areas 3 and 5 are vacant and have minimal areas that are unsuitable for commercial development.

Table 5-6. Suitable acres by High Value Study Area

		Acres			
Study Area	Tax Lots	Developed	Unsuitable	Suitable	Total
HV 1	8	0.0	73.2	8.8	82.0
HV 2	10	1.8	2.2	34.5	38.4
HV 3	2	0.0	6.8	33.8	40.6
HV 4	1	2.1	5.2	22.9	30.2
HV 5	1	0.0	11.7	42.7	54.4

Map 5-12. High-value farm land study areas



High Value Study Area 1

This site is at the "Y" and is located north of the UGB surrounded by exceptions areas. Map 5-13 shows soils and constraints in study area 1. The City makes the following findings with respect to this site:

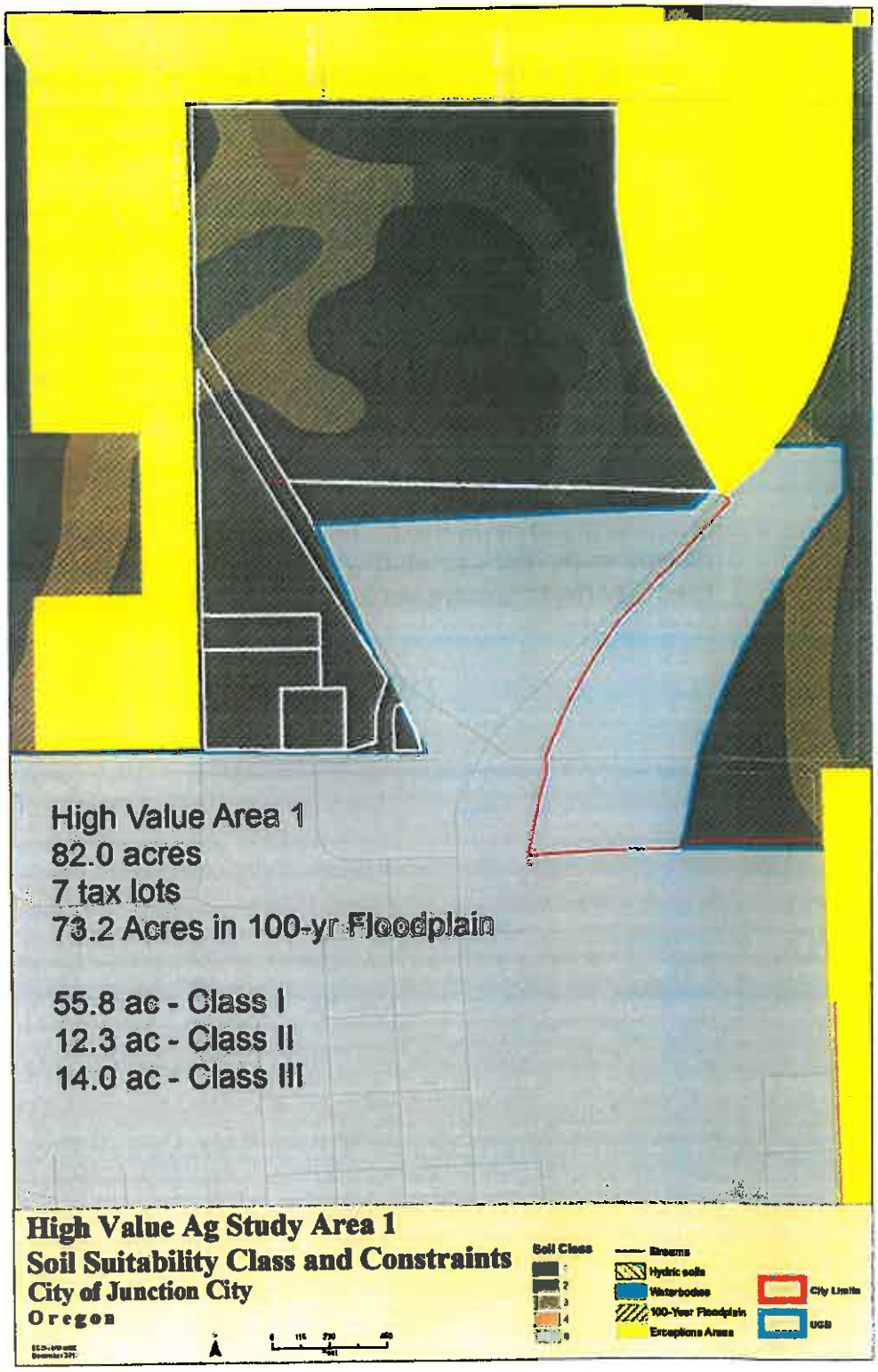
- The majority of the site (55 acres; 68%) is in class I soils. Class I soils are the highest productivity class and lowest priority for inclusion in the UGB.

- The majority (73.2 acres) of the 82.0 acres study area is within the 100-year floodplain. Flood constraints are inconsistent with the siting criteria established for commercial sites.

- No reasonable alternatives exist to meet the 41.3-acre deficit on lower productivity soils in this study area.

Based on the high productivity soils and presence of flood constraints, the City finds this area to be unsuitable for commercial expansion.

Map 5-13. High-value agriculture land study area 1



High Value Study Area 2

This site is on south and west of the UGB, on the west side of Highway 99. Map 5-13 shows soils and constraints in study area 2. The City makes the following findings with respect to this site:

- Area 2-A (outlined in red): Areas east of Flat Creek are functionally isolated and cannot be easily accessed or serviced. These areas are separated from Highway 99 by Flat Creek and the Flat Creek floodplain. Moreover, substantial areas with hydric soils exist in this portion of the study area. For these reasons, the City finds Area 2-A unsuitable for commercial development.

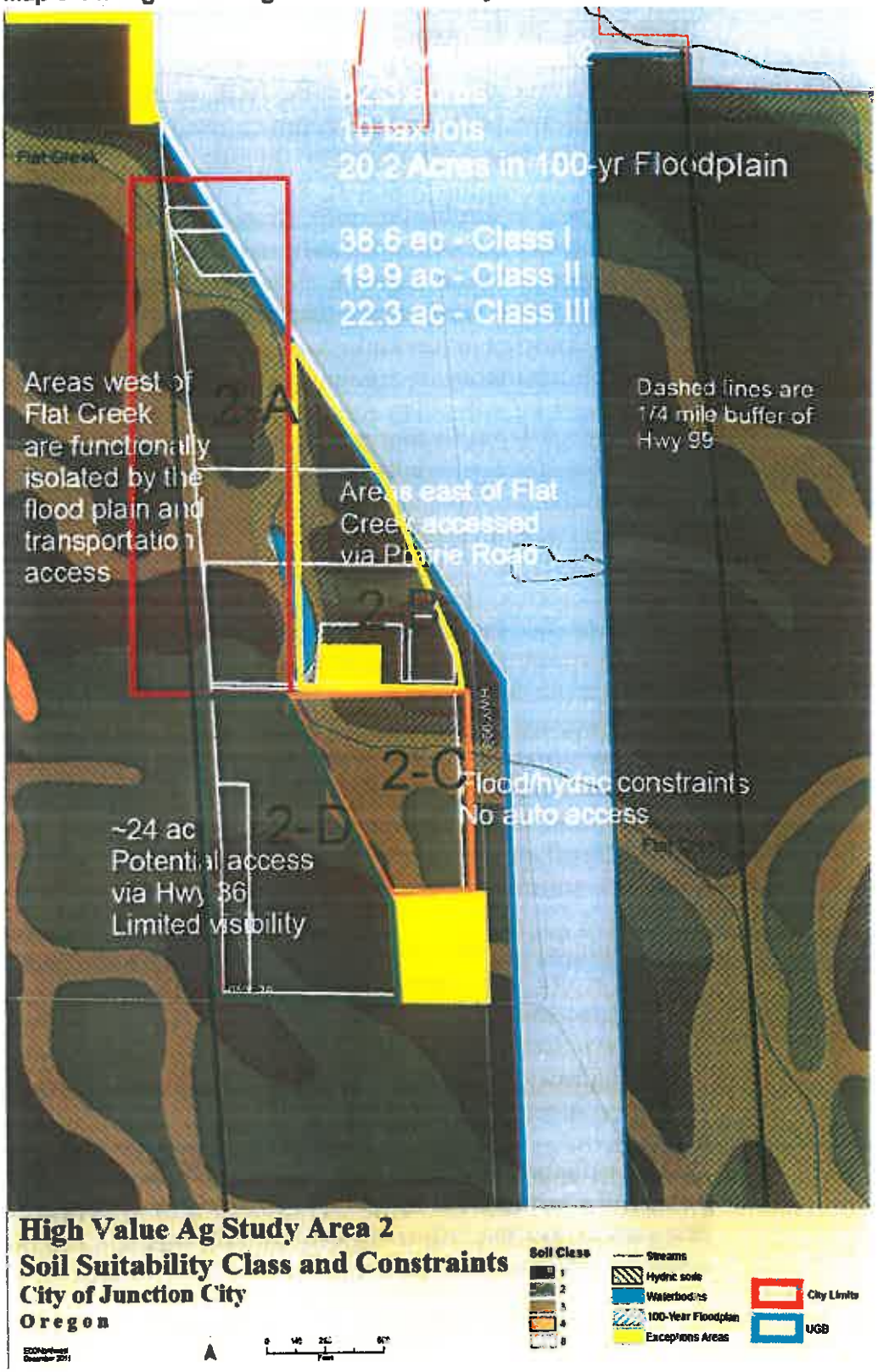
- Area 2-B (outlined in yellow): Areas east and north of Flat Creek have direct proximity and visibility from Highway 99 and access can be provided via Prairie Road. The area includes one small (~1 ac) tax lot in an exception area zoned Rural Industrial. The City finds Area 2-B potentially suitable for commercial development.

- Area 2-C (outlined in orange): This area is approximately 14 acres, of which 11 are either in the floodplain, in hydric soils, or both. A 3-acre portion of the area exists just north of the exception area at the Highway 99/Highway 36 intersection. While this area has visibility and proximity to Highway 99, it has potential access constraints and has several existing buildings, including a rural residence. Moreover, the unconstrained portion of Area 2-C is entirely in Class I soils. For these reasons, the City finds Area 2-C unsuitable for commercial uses.

- Area 2-D (outlined in green): This area is approximately 25 acres. The area is a mixture of Class I (13.3 acres) and Class II (11.7 acres) soils. Area 2-D is partially visible from Highway 99, but does not have frontage on Highway 99. The site would be accessed via Highway 36. The City finds this area potentially suitable for commercial development.

Based on the preceding analysis, the City finds areas 2-B and 2-D potentially suitable for commercial development. Additional analysis in this section and the following section will lead to a final determination about which lands are most appropriate for inclusion in the UGB.

Map 5-14. High-value agriculture land study area 2



High Value Study Area 3

This site is south of Highway 36 and west of Highway 99. Map 5-15/a shows soils and constraints in study area 3. The City makes the following findings with respect to this site:

- The area includes about 40.6 acres in two tax lots.
- The tax lots are in the same ownership.
- The site has a about 1000 feet of frontage on Highway 99 and is highly visible from both Highway 99 and Highway 36.
- Access could be provided via Highway 36 or Highway 99.
- More than 75% of the site is in Class II or III soils.
- The site has direct access to water and wastewater service.
- The site has no floodplain constraints.
- The site has about 6.8 acres of hydric soils. These soils are located on the southern and western portions of the site leaving about 33.8 acres unconstrained.

Based on the above analysis, the City finds High Value Study Area 3 potentially suitable for commercial uses. The site is large enough to accommodate the identified need for a sub-regional commercial center and includes all of the necessary site characteristics for this use.

High Value Study Area 4

This study area is south of study area 3 and about 300 feet west of Highway 99. The study area is separated from Highway 99 by 11 tax lots which are in exceptions areas: Rural Residential zones (7 tax lots) and Rural Commercial zones (4 tax lots). Map 5-15 shows soils and constraints in study area 4. The City makes the following findings with respect to this site:

- The site is about 30.2 acres in area in a single tax lot.
- The site does not have Highway 99 frontage nor is it generally visible from Highway 99. The site is separated by a row of pre-existing rural development which is approximately 300' in depth from Highway 99.

- The site does not have direct access to Highway 99. Access to the site would need to be through one or more other tax lots.

- Like transportation access, services would require an easement through one or more existing tax lots.

- The site has an inclusion of hydric soils bisecting the site from north to south. Approximately 5.2 of the 30 acres are in hydric soil types.

Based on the preceding analysis, the City finds High Value Study Area 4 unsuitable for commercial development. This site does not have appropriate visibility or access, includes soil constraints that potentially limit development, and would require land acquisition or easements to obtain water, wastewater, and transportation services.

High Value Study Area 5

This study area is north of the Junction City Pond and south of High Value Study Area 4. Map 5-15 shows soils and constraints in study area 5. The City makes the following findings with respect to this site:

- The site is approximately 54.4 acres in area and is in a single ownership.

- The site has direct frontage on Highway 99 and is highly visible from Highway 99.

- The site would be accessed via Highway 99.

- The site has access to water and wastewater services; the lines are located at the front of the site along Highway 99.

- The site does not have any floodplain constraints. The site includes about 11.7 acres of hydric soils. Much of the hydric soils are located along the eastern portion of the site creating a development constraint that potentially would require buildings to be located in the western portion of the site, approximately 400+ feet from Highway 99.

- Intensive commercial uses are incompatible with the recreational activities that are provided at the Junction City pond.

Based on the preceding analysis, the City finds this area potentially suitable for inclusion for commercial development. The presence of potential wetlands in the eastern portions of the site combined with

incompatibility with existing recreational activities at the Junction City pond, however, create limitations on commercial suitability.

Conclusion

The analysis of high-value agricultural study areas in the preceding section found four areas in three of the study areas (study areas 2, 3, and 5) are potentially suitable for commercial development. The City conducted additional analysis to determine which of these sites were (1) most suitable, and (2) highest priority under the ORS 197.298 scheme.

The city makes the following findings based on this additional analysis:

- Study areas 2-D, HV3 and HV 5 are potentially suitable for use as a sub-regional commercial center. Study Area 2-B is suitable for general commercial uses.
- Study area 2-B meets all of the criteria for general commercial use and is found to be suitable for those purposes.
- For the remaining study areas, area HV 3 appears to be the most suited for the following reasons:
    - HV 3 meets all of the suitability criteria for a sub-regional commercial center
    - HV 3 potentially has auto access from Highway 99 and Highway 36—a signalized intersection. This means that access from Highway 99 could be limited to southbound traffic reducing safety hazards related to left turn movements on unsignalized areas of Highway 99.
    - HV 3 has the smallest area in Class I soils (Table 5-6)

Table 5-6. Suitable acres by High Value Study Area

	Acres by Soil Class					
Study Area	**I**	**II**	**III**	**IV**	**V+**	**Total**
HV 2						
2-B	4.4	1.6	4.2			10.2
2-D	12.2	10.6				22.8
HV 3	9.8	23.9	6.8	0.0	0.0	40.6
HV 5	11.6	31.1	8.6	3.1	0.0	54.4

- HV 2 does not meet the suitable acreage standard for a sub-regional site, nor does it have direct frontage or visibility on Highway 99

- HV 5 has a larger area in class I soils than HV 3. Moreover, it has hydric soils (potential wetlands) near the front of the site. Further, it would require auto access from Highway 99 both northbound and southbound. Northbound movements would cross southbound lands creating a potential safety hazard.

Based on the preceding analysis, the City finds Area 2-B suitable for general commercial development.

Based on the preceding analysis, the City finds Area HV 3 to be a better alternative for the sub-regional commercial site than Areas 2-D or HV 5. The next section provides further analysis of these three areas based on the Goal 14 criteria.

Map 5-15. High-value agriculture land study areas 3, 4, and 5

PARK LAND

The UGB expansion proposal includes 10 acres of land for a community park. The park site is in a location that has an identified deficit of parks. The Junction City Parks Master Plan identifies a level of service standard of 10 acres per 1000 persons. The City will need approximately 60 acres of new parks to accommodate population growth between 2011 and 2031. Moreover, the Parks Master Plan identifies a structural deficit of one community park 10-30 acres in size because the City is below the desired level of service.

Table 4-19 shows that all parkland need can be accommodated within the existing UGB, with the exception of parkland need in medium-density residential. Junction City will need one 10-acre park to meet the need for 10 to 30 acre community park identified in the Parks Master Plan.

A review of residential lands inside the UGB does not identify any acceptable sites of 10 acres or more in the MDR designation. A review of exceptions lands adjacent to the UGB in the southern part of the city shows that no reasonable alternatives exist to meet a 10+ acre community park on exceptions lands. In fact, none of the exceptions areas adjacent to the UGB have parcels that are 10 acres or more in area.

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 analysis in section 4 concluded that:

- The City has established a parkland level of service standard of 10 acres per 1000 population
- The City has a current deficit of 13.94 acres of parkland based on that standard
- The City will need an additional 60.59 acres of parkland to maintain the desired level of service through 2030
- That Junction City does not have any community parks
- That the desired size range for community parks is 10 to 30 acres

- That community Parks are intended to meet the recreation needs of a large section of the community as well as those of the surrounding neighborhood

The Junction City Parks Master Plan and the analysis in section 4 concluded that no suitable sites for a community park exist within the Junction City UGB and that the City has a deficit of 10-acres for parkland.

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 5-17shows exception areas and agricultural soil classifications within 1.25 miles of the existing UGB. Based on siting criteria identified in the Junction City Parks Master Plan, a Community Park must be at least 10 acres in area. A review of exceptions areas shows that there are no vacant exception area parcels of this size that meet identified size (and other) site requirements.

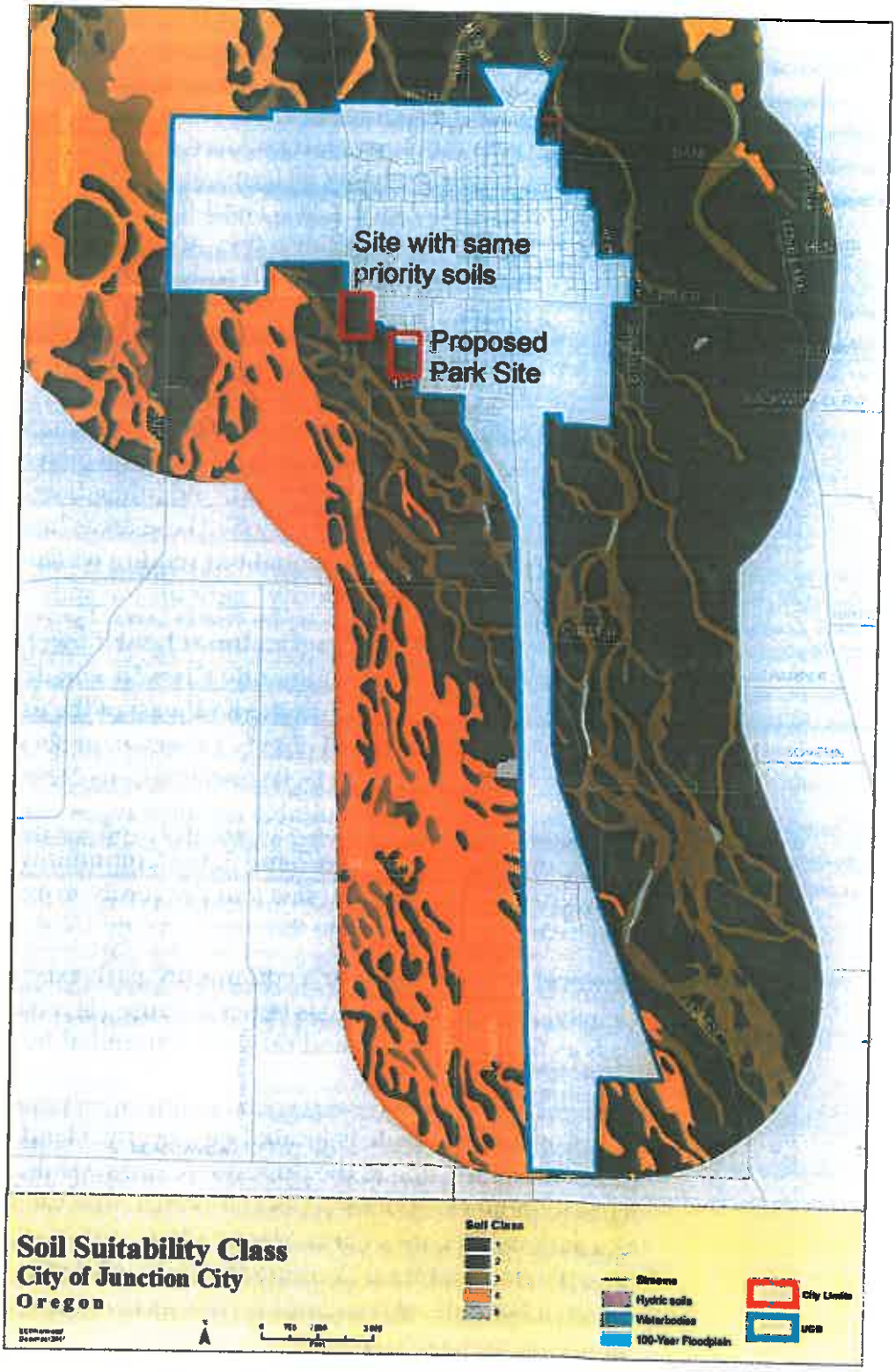
The proposed park site is bordered by the UGB on the north and east, and by exceptions lands on the west. The site is in an "island" of EFU land surrounded by exceptions areas; one other 10-acre EFU parcel exists south of the proposed park site (see Map 5-18). The park site is entirely in Class 3 soils; Salem and Coburg clay loams. These soils are not defined as "High-Value Farmland" under OAR 660-033-0020(8). Thus, the site is considered 2nd priority for Junction City.

Other sites exist near the UGB with similar soil types. The City concludes the proposed site is the most suitable because (1) it is of comparable priority as other sites, and (2) it is identified as a potential park site in the City's Park Master Plan.

Map 5-16. Proposed Community Park Site and Current County Zoning

E40 (Exclusive Farm) Zoning surrounded by Rural Residential

Map 5-17. Soils by classification within 1 mile of the Junction City UGB



Evaluation of Agricultural Land by Agricultural Suitability Class

Map 5-17 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 are "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.

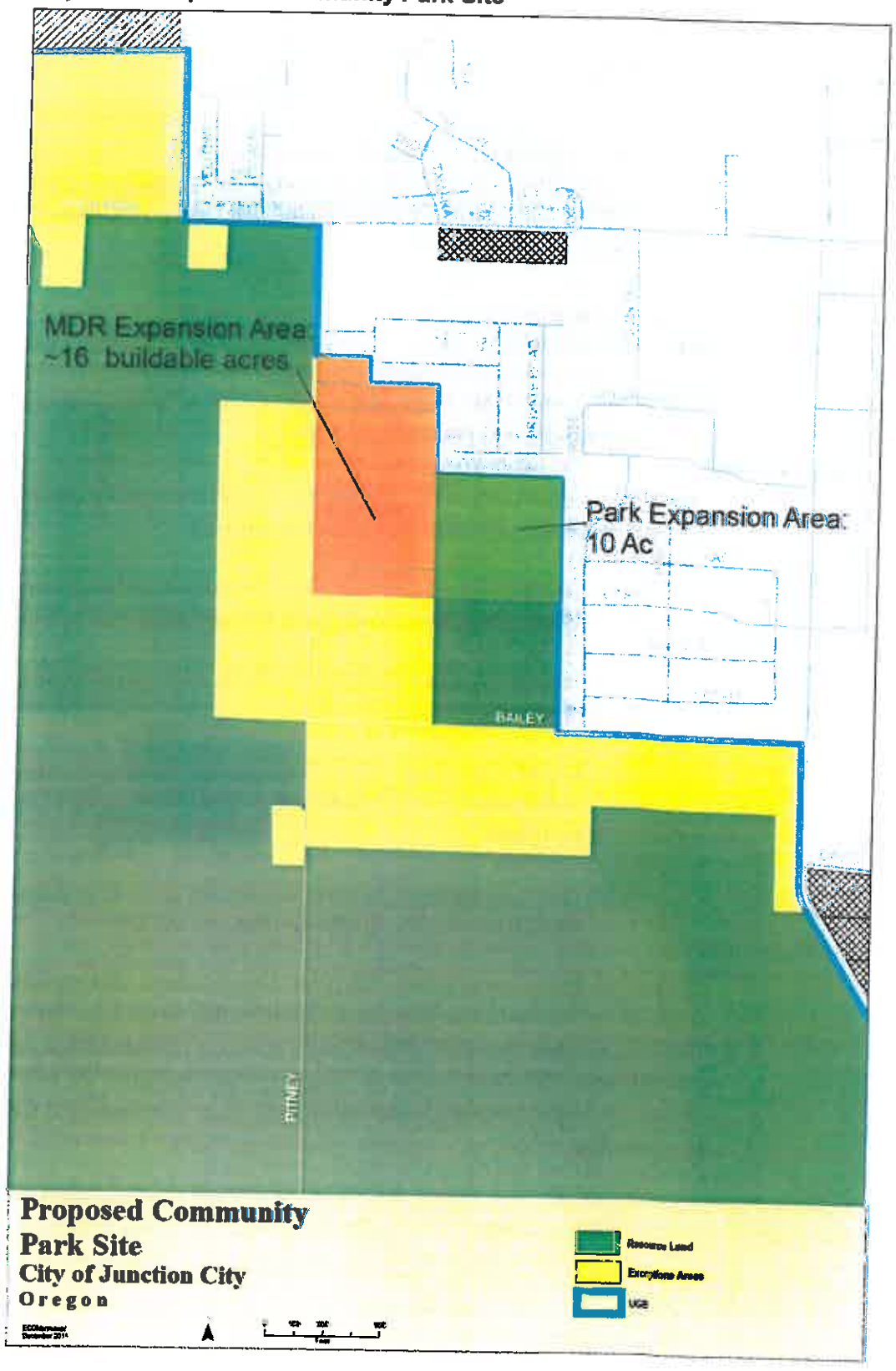
As documented in Sections 2 and 3, the Community Park has specific siting criteria – specifically size and proximity to existing residential areas, which cannot be met inside the Junction City UGB.

However, suitable sites for a community park exist in the same general vicinity. The proposed site is better because (1) it has soils of comparable class as the alternatives, and (2) it is surrounded by exceptions areas.

Conclusion

The proposed park site is located on Priority 2 land under the ORS 197.298 priority scheme, due to the presence of class 3 soils. The site is surrounded by residential exceptions areas and is currently identified for development as a park in the City's Parks Master Plan (see Attachment 14), in order meet the demand for a Community Park. While the site does contain Class 3 soils, it has soils of comparable class as the alternatives. Taken together, these facts make this an appropriate site to consider for UGB expansion to meet unmet park land needs.

Map 5-18. Proposed Community Park Site



RESIDENTIAL LAND

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.*

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.*

The City identifies the following siting preferences for residential expansion areas. Residential lands should be:

- Largely free of development constraints, including floodways, flood plains, wetlands and steep slopes
- Located in areas where conflicts with adjacent lands uses are minimized
- Located in areas that are able to be efficiently served with water, wastewater, stormwater, transportation, school, and park facilities
- Have capacity to accommodate the type of residential development the lands are designated for

Table 5-7 shows vacant land by plan designation. The results show the majority of vacant, unconstrained residential land is in the Low-Density Residential designation (252 of 332 vacant, unconstrained acres). About 45 vacant unconstrained acres are designated Medium-Density Residential, 34 are in High-Density Residential, and less than one acre Commercial-Residential.

Table 5-7. Vacant and Partially Vacant residential land by plan designation, Junction City UGB, 2010

Plan Designation	Tax Lots	Acres in Tax Lots	Acres Unavailable for Housing		Unconstrained Acres
			Developed Acres	Constrained Acres	
Commercial-Residential	5	1	0	0	1
Low-Density Residential	247	400	11	137	252
Medium Density Residential	64	52	2	5	45
High Density Residential	12	39	1	4	34
TOTAL	**328**	**492**	**14**	**146**	**332**

Source: City of Junction City GIS data; analysis by ECONorthwest
Note: Junction City did not have a high-density residential (HDR) plan designation at the time the inventory was completed. It proposed to adopt an HDR designation as part of the efficiency measures included in the UGB review.

Table 4-16 (in the previous section) shows residential land need in Junction City for the 2011-2031 period. The results show that Junction City will need about 215 *net* acres and 301 *gross* acres to accommodate housing over the planning period. Of this, 209 gross acres will be needed in the low-density plan designation, 59 gross acres in the medium-density plan designation, and 28 gross acres in the high-density plan designation.

ORS 197.298 establishes a priority scheme for lands to be included within urban growth boundaries:

> 197.298 Priority of land to be included within urban growth boundary. (1) In addition to any requirements established by rule addressing urbanization, land may not be included within an urban growth boundary except under the following priorities:
>
> (a) First priority is land that is designated urban reserve land under ORS 195.145, rule or metropolitan service district action plan.
>
> (b) If land under paragraph (a) of this subsection is inadequate to accommodate the amount of land needed, second priority is land adjacent to an urban growth boundary that is identified in an acknowledged comprehensive plan as an exception area or nonresource land. Second priority may include resource land that is completely surrounded by exception areas unless such resource land is high-value farmland as described in ORS 215.710.

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 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. These areas were reviewed in Section 4. All residential land proposed for inclusion in the Junction City UGB is in exception areas that are zoned Rural Residential (Map 5-19).

Evaluation of Agricultural Land by Agricultural Suitability Class

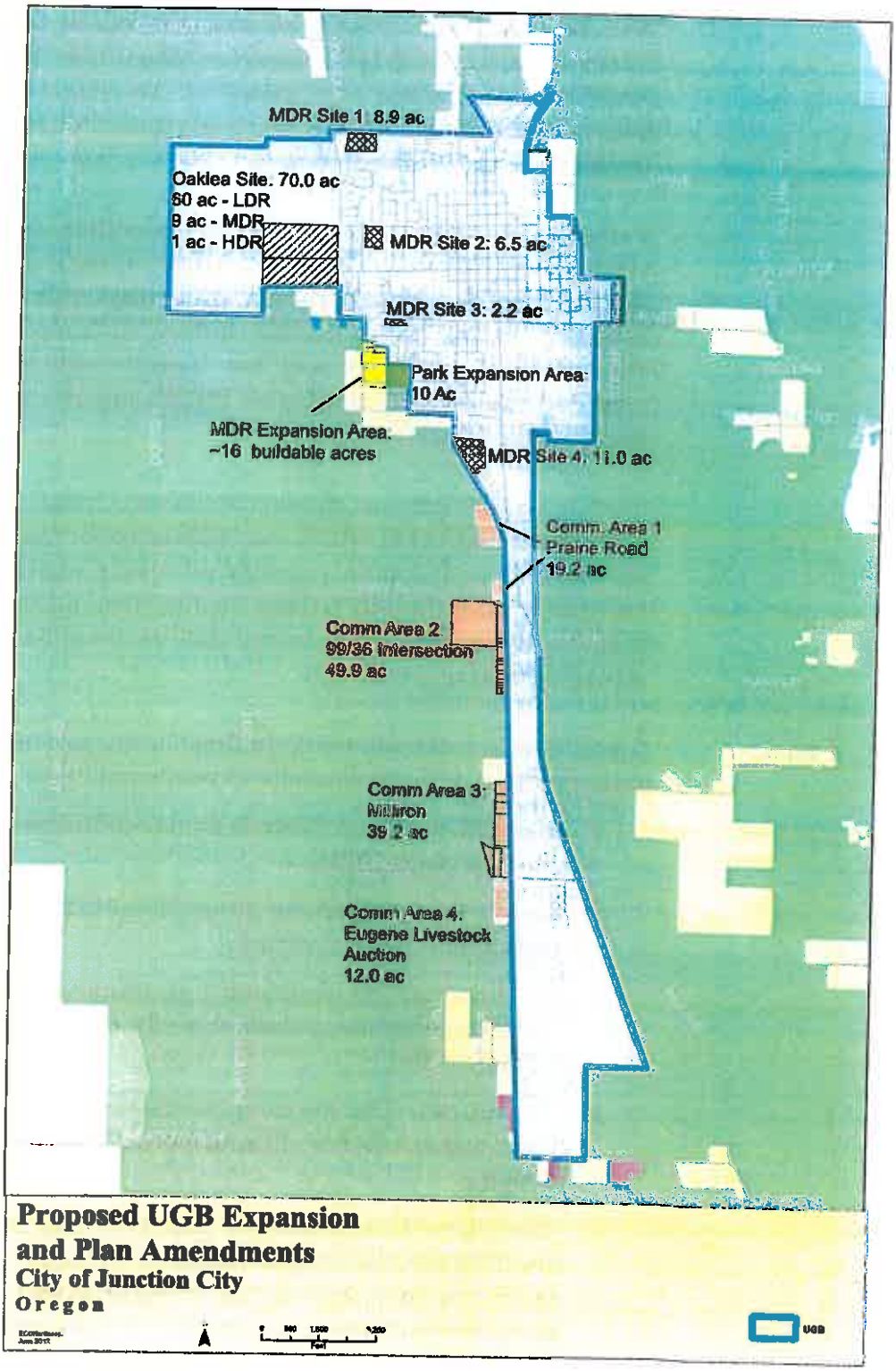
No areas with exclusive farm use zoning are proposed for inclusion in the Junction City UGB to meet residential needs.

Conclusion

Residential land need can be met on second priority lands per ORS 197.298(1)(b). Because Junction City does not have urban reserves, these are the highest priority lands for consideration in the UGB. Junction City proposes to meet all of the residential land need in exceptions areas.

The housing needs analysis identified a deficit of 16 acres of land in the medium-density residential plan designation for housing and small or no surplus in the low- and high-density plan designations. Map 5-19 shows the City's proposed residential UGB expansion as well as land redesignations.

Map 5-19. Proposed Residential UGB Expansion and Land Redesignations within the UGB



To meet identified residential needs, Junction City will adopt and implement the following land use efficiency measures:

- **Redesignation of the Oaklea site.** The Oaklea site is approximately 85 acres of land off of High Pass road that is designated for Professional-Technical (P-T) uses (see Map 5-19). The EOA did not identify a need for land designated P-T. As a land use efficiency measure, the Oaklea site will be redesignated for low- and medium-density residential uses.

  A wetland inventory of the Oaklea site identified about 15 acres of wetlands leaving about 70 acres suitable for residential development. Based on identified residential land needs as expressed in the Housing Section of the City Comprehensive Plan, 60 acres of the site will be used low-density residential (LDR), nine acres medium-density residential (MDR), and one acre to high-density residential (HDR).

  The City will adopt amendments to the residential zoning code to meet the needed LDR, MDR, and HDR acreage standards. The amendments will include a specific provision related to the Oaklea site that requires the site to have an approved master plan that identifies where the nine acres of MDR land will be located prior to any development on the site.

  The City makes the following findings in support of the redesignation of the Oaklea site to residential uses:

  - The Oaklea site has been designated Professional-Technical since the early 1980s.
  - The site has not had any professional-technical development during that 25-year period.
  - The Junction City Economic Opportunities Analysis concluded that there was no need for a Professional-Technical site.
  - The Junction City Housing Needs Analysis concluded that there was a deficit of all land types (LDR, MDR, HDR) for housing.
  - The Citizen Comprehensive Planning Committee (CCPC) conducted a year-long evaluation of Junction City's land needs and inventory and recommended that the Oaklea site be redesignated to a combination of Low- and Medium-Density residential (61 acres LDR and 9 acres MDR).

- The Planning Commission and City Council affirmed the CCPC recommendation with one modification – to require at least one acre of the site be High-Density residential.

- **Redesignation of 32 acres of LDR land to MDR**. This measure is intended to meet an identified deficit of MDR in locations that are in close proximity to transportation corridors and services (See Map 5-19). The land is in four separate sites (9 individual tax lots) with about 31 buildable acres.

- **Creation of a High Density Residential (HDR) plan designation.** To meet identified needs for higher density housing types, Junction City will add a high density residential (HDR) plan designation and make corresponding plan map amendments. Junction City currently has two zoning districts that allow high density housing (R-3 and R-4), but it does not have a high-density residential plan designation. The City will create a new high density residential plan designation as a part of this process. Although the City is not using the safe harbor for housing density in OAR 660-024a, it defines High Density Housing as follows:

  High Density Residential: *A residential zone that allows multiple family housing and other needed housing types in the density range of 12-40 units per net buildable acre. The specified mix percentage is a minimum; a local government may allow a higher percentage.*

  As part of the plan amendments for the UGB package, Junction City will establish a High Density Residential (HDR) plan designation, consistent with the OAR 660-024a definition. Lands that are currently zoned R-3 and R-4 will fall into the new plan designation as shown in Table 4-7 in the previous section.

In summary, Junction does not have a sufficient inventory of medium-density residential land to accommodate identified housing needs. The City has a deficit of 16 acres of low density residential land after consideration and adoption of land use efficiency measures and excluding the 10 acre deficit for parkland in MDR.

The City proposes an expansion of 16 buildable acres (Map 5-19). All of the residential land proposed for inclusion is in existing exception areas and would all be designated medium-density residential.

Section 6: Goal 14 Locational Factors

The findings and analysis in Sections 1 and 2 of these findings demonstrate that (1) insufficient land exists in the UGB to meet identified residential land needs, (2) there are no suitable sites within the existing UGB that will meet the parkland need, and (3) the city has insufficient land within the UGB to meet the 62-acre deficit of commercial land.

Section 6 includes additional findings demonstrating compliance Goal 14 locational factors.

COMMERCIAL

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.*

Evaluation of high-value commercial study areas for UGB expansion

Section 5 concluded that Junction City could meet portions of the commercial land need through (1) land use efficiencies within the UGB; (2) including suitable exceptions areas within the UGB and achieving land use efficiencies on those lands; and (3) adding additional high-value agricultural land.

Section 5 concluded that three sites might potentially meet the need for a 35-acre sub-regional commercial center (HV 2-D, HV 3, and HV 5). It also concluded:

> "..based on the preceding analysis, the City finds Area HV 3 to be a better alternative than Areas 2-D or HV 5. The next section provides further analysis of these three areas based on the Goal 14 criteria."

This section further evaluates these study areas against the Goal 14 criteria.

Table 6-1. Evaluation of suitable high-value study areas against Goal 14 boundary location factors

Factor	HV 2-D	HV 3	HV 5
Factor 1: Efficient accommodation of identified land needs	At 24 acres, this study area is not large enough to accommodate the identified need for a sub-regional commercial center. The City would need to identify additional lands elsewhere to accommodate the uses. Dispersing the proposed uses on multiple sites would be less efficient than a single site. **Worst option under this criteria**	Based on its location at the Hwy 99/36 intersection, its proximity to markets, and the site size (34 suitable acres), this site is well suited to meet the need for a sub-regional commercial center. **Best option under this criteria**	At 42.7 suitable acres, this site is large enough to accommodate the identified need for a sub-regional commercial center. Potential wetlands on the east portion of the site near Hwy 99 potentially require development to be inefficiently located in the western portions of the site. **Second best option under this criteria**
Factor 2: Orderly and economic provision of public facilities and services	This site has indirect access to the water and wastewater lines on the west side of Highway 99. Lines would need to be extended approximate 500' to access the site. Transportation access would be from Highway 36, which would be adequate, but not as desirable as access from Hwy 99 and 36. **Worst option for water/waste water; second best option for transportation**	This site has direct access to the water and wastewater lines on the west side of Highway 99. Transportation access would be from Hwy 99 (right in/out) and Hwy 36. The Hwy 99/36 intersection is signalized. **Best option under this criteria**	This site has direct access to the water and wastewater lines on the west side of Highway 99. Transportation access would be from Hwy 99 which would create potentially hazardous left turn movements. **Second best option for water/waste water, worst option for transportation**

Factor	HV 2-D	HV 3	HV 5
Factor 3: Comparative environmental, energy, economic and social consequences	Environmental: Minimal—no wetlands or floodplains exist in this area. **Best option under this criteria** Energy: Development of a commercial center would reduce trips to Eugene reducing energy consumption. Because the site is not large enough to accommodate all of the proposed uses, the energy benefits would not be as much as for a single site. **Second best option under this criteria** Economic: Development of a commercial center would have positive economic impacts by capturing sales leakage and creating jobs. **Options equal under this criteria** Social: Development of a commercial center would have positive social impacts by creating more community amenities and jobs. **Options equal under this criteria**	Environmental: Some wetlands exist on this site, but they are located at the fringes and could largely be avoided. **Second best option under this criteria** Energy: Development of a commercial center would reduce trips to Eugene reducing energy consumption. **Best option under this criteria** Economic: Development of a commercial center would have positive economic impacts by capturing sales leakage and creating jobs. **Options equal under this criteria** Social: Development of a commercial center would have positive social impacts by creating more community amenities and jobs. **Options equal under this criteria**	Environmental: Wetlands exist near Hwy 99 on this site and could not be avoided. **Worst option under this criteria** Energy: Development of a commercial center would reduce trips to Eugene reducing energy consumption. Site is not as close to City core as other sites, thus energy benefits would not be as significant. **Worst option under this criteria** Economic: Development of a commercial center would have positive economic impacts by capturing sales leakage and creating jobs. **Options equal under this criteria** Social: Development of a commercial center would have positive social impacts by creating more community amenities and jobs. **Options equal under this criteria**
Factor 4: Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the urban growth boundary	This site is bounded on two sides and a portion of a third side by active agricultural use. **Second best option under this criteria**	The site is bounded one side (west) by ag use and a portion of the south side. The site borders existing businesses on the south, Hwy 99 on the east, and Hwy 36 on the north. **Best option under this criteria**	This site is bounded on three sides by active agricultural use (grass seed farming). Commercial use would conflict with recreational uses at the Junction City Pond to the South. **Worst option under this criteria**

Based on the analysis in Table 6-1, the City finds:

- High value site 3 performs best under the most criteria (Factors 1, 2, and 4, and under the energy criteria for Factor 3).
- All three sites perform similarly under the Economic and Social criteria for Factor 3.
- High value site 3 performs second best under the environmental criteria for Factor 3.

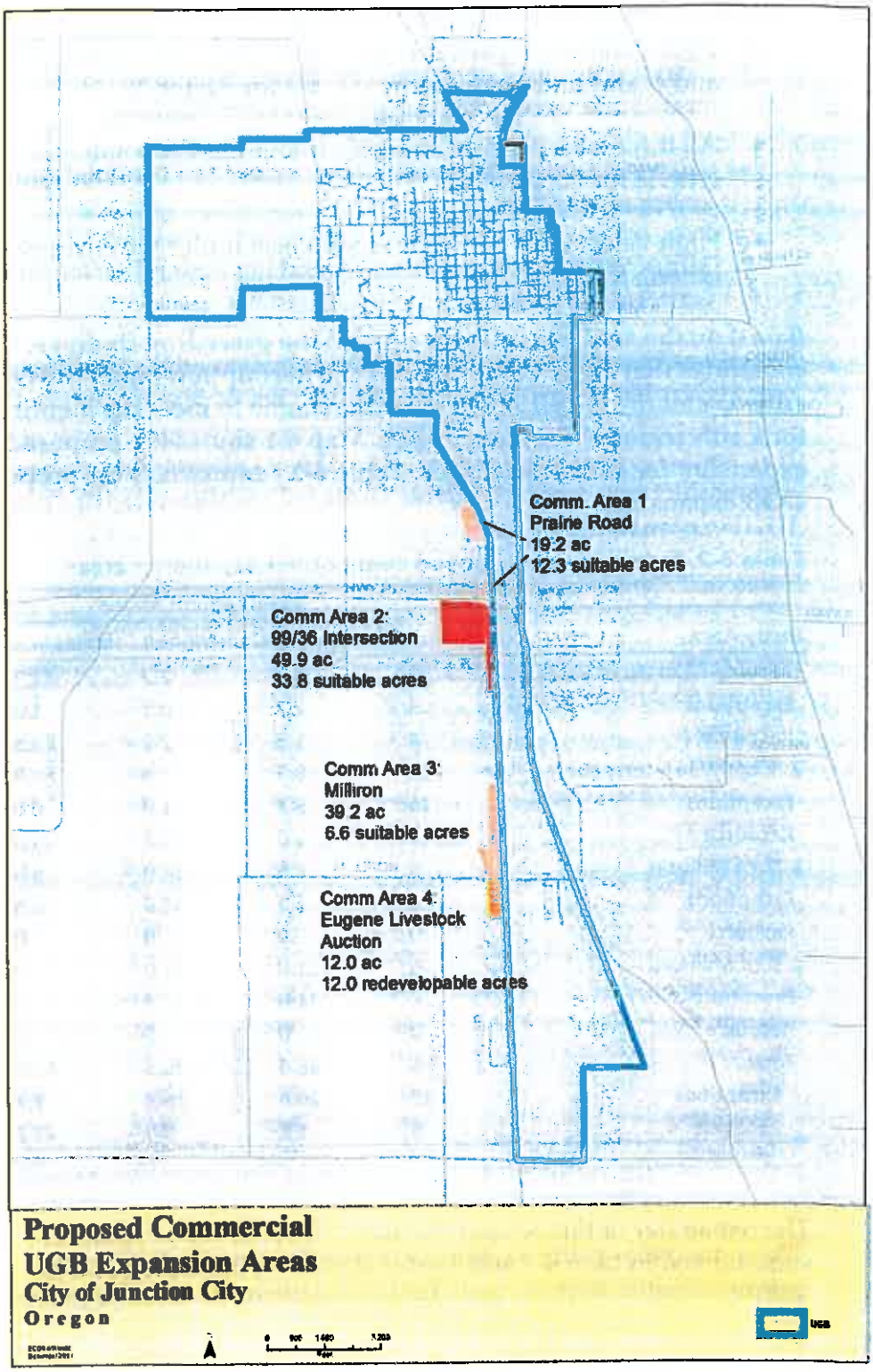
Based on the analysis in Table 6-1 and the preceding findings, the City concludes that High Value Site 3 is the best option under the Goal 14 criteria and the ORS 197.298 priority scheme to meet the identified need for a sub-regional commercial site. Map 6-1 shows the proposed UGB expansion for commercial uses. Table 6-2 summarizes the proposed UGB expansion.

Table 6-2. Summary of proposed commercial expansion areas

		Development Status			
Study Area	Tax Lots	Developed	Constrained	Suitable	Total Acre
1. Prairie Road (N. of 99/36)	9	4.5	2.5	12.3	19.2
Exceptions	3	2.7	0.3	1.2	4.2
Resource	4	1.8	2.2	9.5	13.4
2. S. of 99/36 Intersection	16	8.3	7.8	33.8	49.9
Exceptions	14	8.3	1.0	0.0	9.3
Resource	2	0.0	6.8	33.8	40.6
3. N. of Milliron	6	4.6	14.0	6.6	25.2
Exceptions	6	4.6	14.0	6.6	25.2
Resource	0	0	0	0	0
4. S. of Milliron	5	11.0	1.0	0	11.9
Exceptions	6	11.0	1.0	0	11.9
Resource	0	0	0	0	0
Total	**36**	**28.4**	**25.3**	**52.6**	**106.2**
Exceptions	**29**	**26.6**	**16.3**	**7.7**	**50.6**
Resource	**6**	**1.8**	**9.0**	**43.2**	**54.0**

The remainder of this section evaluates the proposed expansion summarized in Map 6-1 and Table 6-2 against the Goal 14 factors.

Map 6-1. Evaluation of suitable high-value study areas against Goal 14 factors



Findings Demonstrating Consistency with Goal 14 Location Factors 1 – 4

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.

Factor 1: Efficient accommodation of identified land needs

There are no alternatives available to accommodate small-scale commercial and the sub-regional commercial center better than the proposed option.

- **Small commercial needs.** These needs are primarily met on exceptions areas that meet the site requirements for small-scale commercial needs, as described in Section 5. Combined, these sites offer 18.9 acres of suitable land for commercial development, plus another 12 acres for redevelopment.
- **Commercial center.** Section 5 describes the site requirements for a commercial center. The commercial center will require a site at least 35 acres. The site must be located along a major transportation route (with preference at an intersection of two major highways), have visibility from Highway 99, be on unconstrained and flat land, adjacent to the UGB, south of the city, have direct access to City services, and not conflict with surrounding sources.

  The only site that meets the site requirements for a commercial center is High Value Site 3 (in Commercial Area 2 on Map 6-1), which has 34 acres of suitable commercial land. None of the other study area meets these site requirements.

Conclusion: the proposed exceptions meet the site requirements for small-scale commercial. Other exceptions areas do not meet the site requirements because of various deficiencies related to the suitability criteria as described in Section 5. The high-value study area (HV 2-B) located in Commercial Area 1 on Map 6-1 best meets the suitability criteria for the remaining general commercial need. High value study area 3 is the site that best meets the requirements for a commercial center and best complies with ORS 197.298 and the Goal 14 factors.

Factor 2: 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 City is in the process of extending City water and wastewater along Highway 99, south to Milliron Road. This extension provides all land along the west side of Highway 99 direct access to City services. Thus, all lands proposed for commercial use in the UGB expansion have direct access to key services.

The proposed site of the sub-regional commercial center is the best site for transportation access. Access southbound can be provided via right turn lanes off of Highway 99. Additional access can be provided off of Highway 36. Northbound traffic would use the Highway 99/36 intersection—a signalized intersection. This will reduce traffic conflicts and enhance safety.

Conclusion: All areas proposed for inclusion for commercial uses meet the requirements for orderly and economic provision of public facilities and services.

Factor 3: Comparative environmental, energy, economic and social consequences

- **Economic Consequences:** The economic consequences of including all of these areas will be positive, because their inclusion will provide suitable employment land as called for in the Junction City EOA. The inclusion of a site for a sub-regional commercial center will help the City meet the objective of reducing the $25 million in retail sales leakage annually as well as creating jobs for city residents.
- **Environmental Consequences:** The proposed expansion areas minimize environmental consequences by (1) directing development to exceptions areas, (2) fostering redevelopment, and (3) minimizing development on wetlands.
- **Energy Consequences:** The energy consequences of including all proposed areas will be positive, since local employment will improve the jobs-housing balance and reduce retail and service "leakage" - which will likely result in reduced energy consumption

for (a) working commuters and (b) shoppers. The proposed commercial center will potentially reduce travel for groceries and other services by up to 10 miles for individuals that travel to Eugene because they cannot access the proposed goods or services in Junction City. This will potentially save tens of thousands of vehicle miles traveled each year, with corresponding energy use reductions.

- **Social Consequences:** The social consequences of including these areas will be positive because their inclusion will increase access to goods and services, as well as employment. The commercial uses will also provide positive benefits to employees and visitors to the proposed state facilities.

Conclusion: Inclusion of areas for small-scale commercial land needs will provide local jobs and reduce energy consumption resulting from reduced commuting and the availability of increased shopping.

Inclusion of High-Value Study Area 3 for a sub-regional commercial center will provide hundreds of local jobs and reduce energy consumption resulting from reduced commuting and the availability of increased shopping. This site will be closer to and better able to conveniently serve current and future growth of residential and employment uses in the sub-regional market, including Junction City and nearby small communities and rural areas.

Factor 4: Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the urban growth boundary

- **All active agricultural uses adjacent to proposed UGB expansion areas are in grass seed production.**

- **Proposed exceptions areas.** Because these lands are already developed and generally in either commercial or residential use, conflicts with nearby grass seed production would be minimal.

- **Proposed agricultural lands for general commercial use.** Lands in High-Value Study Area 2-B are not presently in agricultural use. Thus development of these lands would not directly impact an active agricultural operation. Moreover, the lands proposed for inclusion are separated from active grass seed farming to the west by Flat Creek. This creates a functional buffer of 300+ feet between any future commercial uses and grass seed farming to the west.

- **Sub-regional commercial center:** The proposed site for the sub-regional commercial center is bounded on two sides by state

highways with right-of ways that are more than 200 feet (Hwy 99) and 100 feet (Hwy 36). Areas to the south and west of the proposed site are in active grass seed production. The site, however, is ringed on the south and west by a vegetated swale that provides a 100-foot or more buffer.

Conclusion: Increasing commercial development on exceptions areas will have minimal impact to existing agricultural operations. Development of the High-Value Agricultural land in area HV 2-B will have minimal impacts due to a 300' buffer between the site and existing farm uses. Development of the sub-regional commercial center will have minimal impacts because of a 100' or more buffer from existing farm operations.

PARKLAND

Findings Demonstrating Consistency with Goal 14 Location Factors 1 – 4

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 proposed park site has specific site size and access requirements that can best be met on the site proposed for UGB expansion. Nevertheless, additional findings showing consideration of Goal 14 locational factors are provided below.

Factor 1: Efficient accommodation of identified land needs

There are no alternatives that can accommodate these proposed parkland use more efficiently than the site included in the expanded UGB.

- The site is identified in the City's adopted parks master plan
- It is of suitable size for a community park, with potential for future expansion
- It is adjacent to current residential development, consistent with the site requirements for Community Parks

Factor 2: 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."

Services are readily available for the types of uses associated with a Community Park.

Factor 3: Comparative environmental, energy, economic and social consequences

Environmental Consequences

Based on review of soils, development of the park site proposed for inclusion within the UGB will not have adverse impacts on wetlands. Soils on the site are not hydric soil types, and are unlikely to include regulated wetlands.

Energy Consequences

The park site is located near existing and planned residential development. The park is within walking distance of a significant portion of the Junction City population.

Economic Consequences

The economic consequences of siting the Community Park at the proposed location are positive. The park will provide a long-term amenity for community residences and will partly address identified recreation needs in the community. Moreover, development of the park will create short-term construction jobs.

Social Consequences

The Community Park will have positive social consequences by providing developed recreation opportunities for the greater Junction City community. When fully developed, the Community Park will provide a range of programs that will benefit the entire community.

Factor 4: Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the urban growth boundary

The park site is currently planted with rye grass. The site is bordered by residential development within the UGB on the north and east; and by rural residential development on the west. The site is bordered by a second 10-acre parcel on the south that is in similar use. Additional rural residential development exists south of Bailey Road.

Because the site is ringed by existing residential development, developing a park on the site will have negligible impacts to agricultural uses.

RESIDENTIAL

Findings Demonstrating Consistency with Goal 14 Location Factors 1 – 4

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 City evaluated four groups of exceptions areas for potential inclusion in the UGB (Map 6-2).

Map 6-2. Residential study areas

The following sections provide findings showing consideration of the Goal 14 locational factors.

Factor 1: Efficient accommodation of identified land needs

There are no alternatives available to the proposed sites that can accommodate residential uses more efficiently than the sites included in the expanded UGB.

- There are no alternatives within existing UGB that could fully meet residential land needs.
- The City considered a range of land use efficiency measures to accommodate identified needs within the UGB. Four of these measures are included as part of the UGB review package (see Section 5).
- The City considered four consolidated residential exceptions areas as part of the review process (see Map 6-2). The City makes the following findings with respect to the four residential study areas:
    - Study Area 1: This study area is about 37 acres on 14 tax lots. The area is located on the Northeast edge of the Junction City UGB. Thirteen of the 14 tax lots have pre-existing development; many have multiple buildings. Nearly the entire area is within the 100 year floodplain of the Willamette River. The CCPC eliminated this study area based on the floodplain constraints.

    - Study Area 2: This study area is 101.6 acres on 51 tax lots. The study area is located in between the "Y" formed by the junction of Highways 99E and 99W. The exceptions areas are located along Highway 99E, Link Lane, and Toftdahl Road. The exceptions areas ring a 61-acre parcel of prime farmland that is zoned EFU and is nearly 100% class 1 and 2 soils.

      Much of the exception land in study area 2 is in the 100-year floodplain of the Willamette River. Moreover, the area includes some lands with hydric soils which are suggestive of wetlands.

      This study area is functionally separated from other residential areas in Junction City and would be difficult and inefficiency to serve with water and wastewater. The CCPC excluded this area from further consideration due to these factors.

- Study Area 3: This study area is 20.4 acres in nine tax lots. It is located south of the Oaklea site, west of Oaklea Road, and North of High Pass Road. The area is largely absent of development constraints (floodway/floodplain and steep slopes). The area is west of existing residential development and south of the Oaklea site which is proposed for residential development.

  Based on review of the residential siting criteria, this area is generally identified this area as suitable for residential development. The CCPC ranked this area second in priority of the four study areas.

- Study Area 4: This study area is 77.4 acres in 36 tax lots. The exceptions areas are in the southwest area of the UGB and are located both east and west of Pitney Road and south of Bailey Road. The exceptions areas surround two EFU parcels (20 acres total) which are adjacent to the UGB. One of the EFU parcels is identified in the Junction City Parks Master Plan as a potential park site. The UGB proposal includes that 10-acre parcel as a Community Park.

  Based on review of the residential siting criteria, this area is generally identified this area as suitable for residential development. The CCPC ranked this area first in priority of the four study areas.

Factor 2: 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 areas proposed for inclusion for residential uses in the UGB are all adjacent to the existing UGB and easily serviced.

Factor 3: Comparative environmental, energy, economic and social consequences

Environmental Consequences

Development of areas proposed for inclusion for residential uses within the UGB may 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 many parcels surrounding the Junction City UGB. The sites proposed for inclusion within the UGB each have areas that are not in hydric soils which allow development to occur on part of these sites without directly impacting wetlands.

Energy Consequences

The sites proposed for residential uses are located adjacent to existing residential uses and are less than one mile from central Junction City, and are close to existing schools.

The location of the proposed areas adjacent to existing residential areas will have positive energy consequences (less travel required and less energy consumed by mechanical equipment and pumping), compared with locating residences in areas that are further from the city core.

Economic Consequences

The economic consequences of expanding the UGB for residential uses at the proposed locations are positive. The areas will provide opportunity for additional housing construction which will support the construction industry. Moreover, providing adequate housing in Junction City is important to the City's community development of objective of providing housing opportunities for individuals that work at the state facilities.

On the other hand, not providing residential land in the UGB would have negative consequences; state workers would have limited housing options in Junction City. Many would likely choose to live in Eugene or other nearby communities.

Social Consequences

The inclusion of residential land in the UGB will provide opportunities for new households. Some households will have children that will attend schools in the Junction City School District. Moreover, adding new households to the community will have positive social benefits – from supporting community activities, to supporting local businesses.

Such impacts would presumably occur regardless of the location of new residential land; however, the proximity of the proposed areas relative to existing uses provides a higher level of social benefit.

Factor 4: Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the urban growth boundary

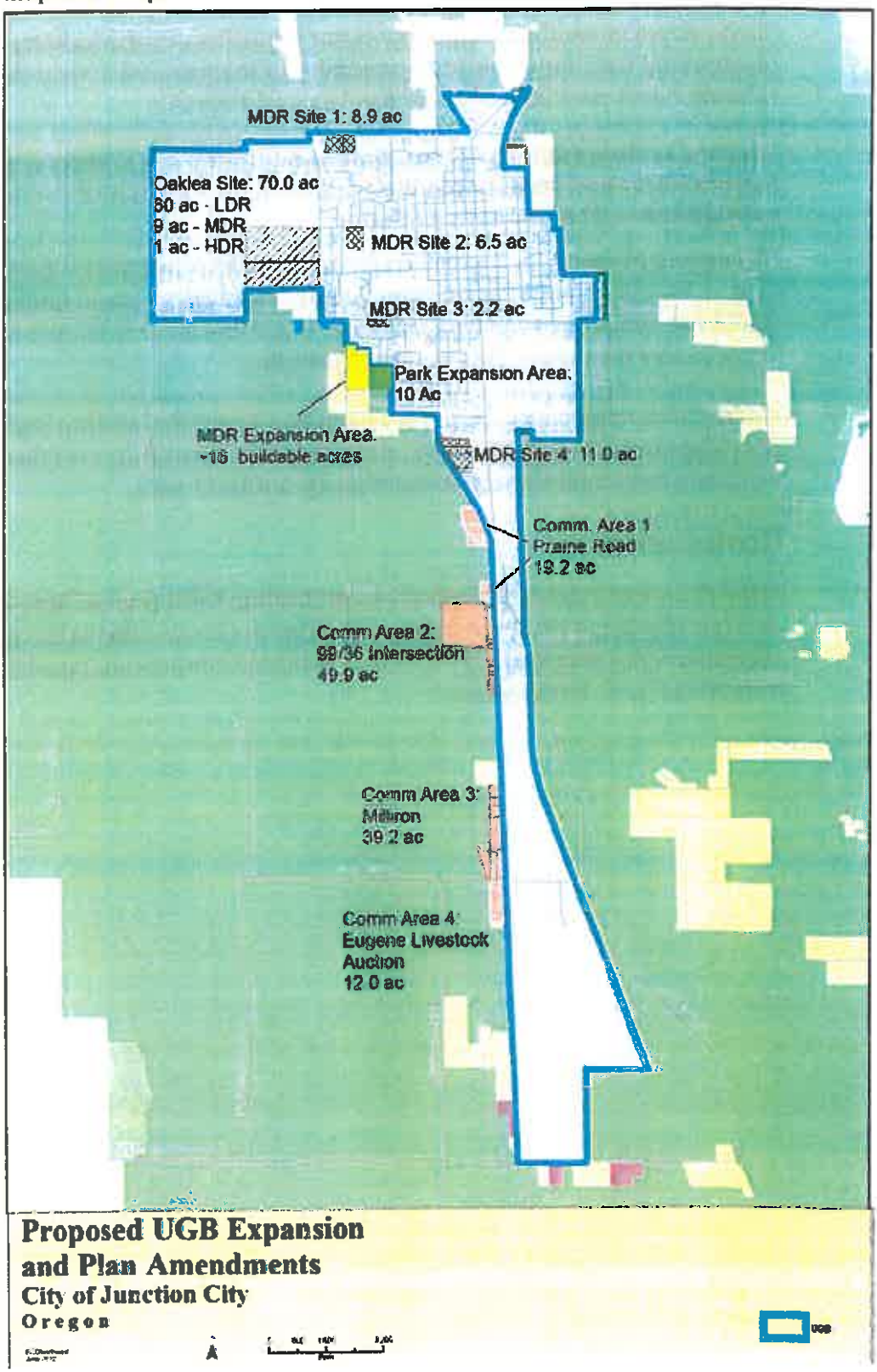
The areas proposed for inclusion for residential purposes in the Junction City UGB will all abut agricultural lands. The adjacent lands outside the UGB are zoned for exclusive farm use. All of the adjacent lands have historically been used for grass seed farming.

Many of the parcels proposed for inclusion have pre-existing residential development. The additional of new residential dwellings on these sites will have minimal impact on existing agricultural uses.

Conclusion

Map 6-3 shows actions proposed as part of the UGB review. Based on the analysis findings presented above, the City concludes this is the best alternative for Junction City to meet identified commercial, parkland, and residential land deficiencies.

Map 6-2. Proposed UGB Amendments



While Map 6-3 shows proposed plan designations, the City will not rezone the land until it has completed an update of its Transportation System Plan. This is consistent with OAR 660-024-0050(6)

> *When land is added to the UGB, the local government must assign appropriate urban plan designations to the added land, consistent with the need determination. The local government must also apply appropriate zoning to the added land consistent with the plan designation or may maintain the land as urbanizable land until the land is rezoned for the planned urban uses, either by retaining the zoning that was assigned prior to inclusion in the boundary or by applying other interim zoning that maintains the land's potential for planned urban development. The requirements of ORS 197.296 regarding planning and zoning also apply when local governments specified in that statute add land to the UGB.*

Thus, the City's proposal complies with OAR 660-024-0050(6).

Section 7: Statewide Goal Consistency Analysis

This section addresses compliance with applicable Statewide Planning Goals. Consistent with the rest of the findings document, it is organized in three sections: (1) residential; (2) parkland; and (3) commercial. Each section provides analysis of goal consistency for that land type.

We address the Goal 1 and Goal 2 findings for the entire proposal since the public involvement and hearing process was the same for all three land areas. In short, the City determined that there were advantages to having an integrated public involvement process for this project. Thus each section addresses Goals 2-19.

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.[29] The City engaged in an 12- month public involvement process which ran from June 2010 – June 2011. Each of the Citizens Comprehensive Planning Committee meetings was publicly noticed and public comments were welcomed.

These meetings resulted in recommendations related to (1) the housing chapter and residential expansion areas; (2) parkland expansion areas; and (3) the economic opportunities analysis (several elements of the EOA were deferred for discussion and revision until Phase II) and proposed commercial expansion areas.

The CCPC considered public testimony at all of the CCPC meetings. 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. The City circulated a draft UGB concept for review and comment by state agencies and other interested parties in September 2011.

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

[29] http://www.junctioncityoregon.gov/index.asp?Type=B_BASIC&SEC={A880193F-CC87-4017-8598-225A620F0876}

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 and housing studies, the City has inventoried existing employment and residential 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* (2011).

Goal 2 also requires the consideration of alternatives.

- The CCPC considered a range of alternatives in developing the EOA, housing, and parkland analysis
- The CCPC went through a 12-month process of reviewing technical information and considering alternatives
- The CCPC considered land use efficiency measures in addition to UGB expansion, including deductions for employment that will locate in residential areas, and employment that will not require any new building space or vacant land.
- The CCPC recommended an UGB expansion package that included a combination of land use efficiency measures for residential and commercial uses as well as proposed UGB expansion areas for residential, parkland, and commercial uses
- The City circulated the draft UGB concept for agency and stakeholder review and comment in September 2011.

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

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, with the exception of wetlands.

The Junction City Local Wetland Inventory and Wetland Protection Program meet the requirements of the Goal 5 administrative rule (OAR 660-023). The Junction City Local Wetland Inventory and Wetland Protection Program:

- Complies with the requirements for a Local Wetland Inventory established in OAR 141-86-0180 through 0240.
- Fulfills the wetlands inventory requirements for Goal 5 (OAR 660-015 and 660-023).
- Identifies the "impact areas" around the wetlands, as well as the conflicting uses – any land uses or activities in the "impact area" that, if allowed, "could adversely affect" a wetland.
- Considers the relationships between each wetland and the economic, social, environmental, and energy consequences of allowing, prohibiting, or limiting conflicting uses on each wetland pursuant to OAR 660-023-0010.
- Determines how to protect each wetland - full, limited, or no local protection, based upon the provisions established in OAR 60-023-0040.
- Adopts comprehensive plan provisions and land use regulations to implement the decisions made pursuant to OAR 660-023-0040(5).
- Provides additional buildable lands to offset the reduction in the developable land supply for wetlands that are protected locally, under the provisions of OAR 660-23-070.

Thus, Goal 5 has been properly addressed.

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. The CCPC processed considered lands within the 100-year floodplain and attempted to avoid expanding into areas with identified flood hazards. Lands included within the UGB expansion proposal have minimal areas within the 100-year floodplain. Thus, Goal 7 has been properly addressed.

Goal 8 Recreation Needs

Goal 8 requires governmental organizations with responsibilities for providing recreational facilities plan for recreational facilities. Junction City adopted a Parks Master Plan in 2010 (see Attachment 14). That plan inventoried existing facilities, established a level of service standard, and identified park needs for the 2010-2030 period.

The UGB expansion proposal includes a 10-acre site for a Community Park which meets a need identified in the Junction City Parks Master Plan. Thus, Goal 8 has been properly addressed.

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 commercial land needs. No additional industrial land is needed within the UGB. The City adopted the EOA in 2009 and it was acknowledged by DLCD in the Phase I UGB review.

The evaluation of commercial land need was included in Phase II of the project. As a part of the process, the City facilitated a community visioning process and a 12-month long public involvement process. As a result of the Phase II process, the City included amendments to the 2009 EOA to address two issues: (1) the community economic development vision; and (2) site requirements for commercial lands.

The Phase II process as well as the amendments to the EOA and comprehensive plan considered the guidance of statewide planning Goal

9 and its applicable administrative rule (OAR 660-009). The City's EOA and Comprehensive Plan amendments comply with Goal 9.

Goal 10 Housing

The City conducted a housing needs analysis using the methods described in the recommended approach is described in "Planning for Residential Growth: A Workbook for Oregon's Urban Areas," the Department of Land Conservation and Development's guidebook on local housing needs studies. For this reason, Goal 10 has been adequately addressed.

Goal 11 Public Facilities and Services

The City initiated its customized periodic review pursuant to OAR 660-025-0035(1), and received LCDC approval for said limited review per OAR 660-025-0035(2). Accordingly, the City's Customized Periodic Review Program, as negotiated with and approved by DLCD, does not require or include the completion of any Public Facilities and Service Plans as part of the approved work tasks. The absence of a planning element that may otherwise be an integral part of a *scheduled* periodic review (which is not the case here) is allowed and contemplated by OAR 660-025-0070(2). This rule states, "When a local government requests initiation of period review under OAR 660-025-0035(2), . . . the scope of such periodic review may be more limited than would be the case for scheduled periodic review ..." This allowance makes sense where periodic review is requested by a city to address targeted needs and specific anticipated developments.

Here, the City is not proposing the adoption of new facility plans, and will not unless and until the remaining work task submittals are approved and acknowledged. This approach ensures that valuable resources are not wasted, and facility plans that can never be followed are not completed; unless and until the City achieves the goals which justified its requested customized periodic review. This tiered approach is anticipated by OAR 660-011-0050(3). This rule requires DLCD to evaluate whether a proposed public facility plan is consistent with the acknowledged comprehensive plan. Without first adopting a Comprehensive Plan that reflects the community's vision and identified economic and residential needs, revised facility plans have little chance of being approved under this criteria. Rather, this rule contemplates that facility plans will be finalized and submitted for approval only after the desired Comprehensive Plan provisions are acknowledged.

Despite this requisite tiered approach, the City has been moving forward with planning efforts to ensure that the City has adequate public facilities and services to serve anticipated growth.

In 2009, the City of Junction City adopted a Water System Plan to serve urban land through the 2030 planning period, with a future population of 13,136. The improvements recommended in the Water System Plan are consistent with the adopted Coordinated Population Forecast of 13,286 by 2031, assuming a 3.1% annual average growth rate, as adopted in the forecast. The report evaluates the anticipated water supply, treatment, pumping and storage needs for the 20-year planning period. Implementation of the improvements will provide an adequate and dependable water system for the City's existing and future customers. The adoption of this Water System Master Plan, which provides for the planned development of Junction City's Water system to accommodate the proposed Comprehensive Plan and UGB amendments, complies with the requirements of Goal 11. The City acknowledges that it will need to adopt this plan as a post-acknowledgement plan amendment, and make any refinements needed to make it consistent with the proposed amendments.

The City is also working to update its Wastewater System Plan. The City has made several attempts to evaluate its sewer treatment needs over the past 15 years, but uncertainty regarding the State Prison siting in the City has put the City in a difficult position in terms of finalizing the design parameters for a sewage treatment plan upgrade or replacement.

A Wastewater System Plan was approved by DEQ in 2006, with plans to serve urban land through the 2029 planning period. The Plan anticipated upgrading the existing sewage treatment plan and discharging treated wastewater in the winter and completing land application during the summer.

In the absence of clear direction from the Department of Corrections fixing a date for the development of the prison, the City finds that its Wastewater System Plan is adequate to accommodate the City's expected growth in the near future, and therefore complies with Goal 11.

This conclusion is supported by the fact that the State approved and acknowledged a 2010 Comprehensive Plan amendment expanding Junction City's UGB specifically to accommodate planned wastewater treatment plant expansion needs.

The City acknowledges that it will need to further refine its 2006 Wastewater System Plan to accommodate the plan period, population,

and proposed urban growth boundary established by the proposed amendments. In the interim, the City is in the process of negotiating a Mutual Agreement and Order (MAO) with Oregon DEQ that outlines a schedule for upgrading the City's wastewater treatment plant.

In order to ensure that plans are in place to provide appropriate wastewater treatment capacity to serve anticipated growth, the City has included the following policies in Chapter 4 (Economic Element) and Chapter 10 (Housing Element) of the Comprehensive Plan, respectively, addressing the provision of public facilities needed to support development:

Chapter 4: "Coordinate capital improvement planning with land use and transportation planning to coincide with the City's Economic Development Strategy."

Chapter 10: "The City of Junction City shall coordinate planning for housing with the provision of infrastructure. The Planning Department shall coordinate with other city departments and state agencies to ensure the provision of adequate and cost-effective infrastructure to support housing development."

The provisions of public facilities and services consequences have been considered in the Goal 14 alternatives analysis process.

For the above reasons, the City finds that Goal 11 has been addressed for purposes of this customized periodic review and that, therefore, the proposed amendments are in compliance with Statewide Planning Goal 11.

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 660-012-0060(1). For purposes of the proposed amendments, the Transportation Planning Rule (TPR) requires additional analysis if the proposed amendments would significantly affect an existing or planned transportation facility, as defined in OAR 660-001-0060(1).

The first step is to determine whether the proposed zone change would "significantly affect" an existing or planned transportation facility. If the answer is yes, then the TPR applies and further consideration or possible

mitigation is required. If the answer is no, then no further consideration is required. This initial TPR evaluation can be accomplished through a comparison of the potential number of trips which could be generated from allowed uses under the current designations and zoning against trips which could be generated by allowed uses under the proposed designations and zoning. Even if increased trip generation could result, this may not result in significant affects to City transportation facilities. See, *Griffith v. City of Corvallis*, 50 Or LUBA 588, 596-97 (2005).

There are three types of land use amendments being proposed that must be evaluated under the provisions of OAR 660-012-0060, as follows:

1. Amendments to the Junction City Comprehensive Plan text and map to re-designate properties within the City's Urban Growth Boundary from Low Density Residential to Medium Density Residential. A total of 28.6 acres within the City's Urban Growth Boundary are proposed to be redesignated. The areas proposed for redesignation are dispersed through the City's existing Urban Growth Boundary, as shown in Map 6-2.

   The proposed redesignation would permit a broader range of housing types, including more compact single-family residential and duplex and triplex units. Despite the potential increase in total number of units, the alternative housing types that would be allowed under the new designations have been studied by traffic engineers and shown to have fewer trips per dwelling unit, thereby offsetting the potential impact by increased number of units. For example, as shown in Table 6.3, if the properties were developed under current Low-Density Residential allowed densities, approximately 210 PM Peak Trips would be generated. Under the proposed redesignation to Medium Density Residential development, the properties could be developed as attached housing, which would have a net increase of approximately 9 PM Peak trips, as compared to current conditions.

   As a result, as shown in Table 6.3, only a slight increase in the volume of traffic would occur. Any increase in trips caused by development allowed under the proposed redesignation would not significantly affect the level of service for existing or planned transportation facilities that these dispersed units would use, as compared to development allowed under the existing designation of Low Density Residential. With this finding, OAR 660-012-0060(2) is inapplicable to this proposed redesignation and the TPR analysis ends here.

Table 6-3. Comparison of Trip Generation

INSTITUTE OF TRANSPORTATION ENGINEERS
TRIP GENERATION RATE (PM Peak Hour)
(Trip Generation Manual, 8th Edition)

	Code	Description	Unit of Measure	Trips per Unit	Acres	Density (DU/Net Acre)	Units	PM Peak Hour Trips	Difference in PM Peak Hour Trips
Potential Development Under Current Property Designation									
	210	Single-Family Detached Housing	Dwelling Units	1.01	28.6	7.3	208.78	210.8678	*NA*
Potential Development Under Proposed Property Designation									
Alternative 1	210	Single-Family Detached Housing	Dwelling Units	1.01	28.6	8.7	248.82	251.3082	40.4404
Alternative 2	230	Residential Condominium/Townhouse	Dwelling Units	0.62	28.6	12.4	354.64	219.8768	9.009

2. Amendments to the Junction City Comprehensive Plan text and map and to the Zoning Map of the City of Junction City to re-designate and rezone properties within the City limits from approximately 85 acres of Professional/Technical to a combination of Low, Medium, and High Density Residential. The proposal includes one acre of High Density Residential (R-3 zoning), 9 acres of Medium Density Residential (R-2 zoning), with the remaining approximately 75 acres to be developed as Low Density Residential (R-1 zoning). The locations of these different densities would be established through a Master Plan that would be required to be submitted with the first proposed development application. The Master Plan would follow the application procedures and process required for a Planned Unit Development, as contained in JCMC 17.65. In the interim, the Zoning Map would identify the different acreages of land to be developed in each zoning classification.

   Using the ITE Manual, it is anticipated that the current Professional Technical designation of the site would allow up to 743 peak PM trips. The ITE Manual also indicates that the maximum development allowed under the proposed amendments could exceed this number of PM trips. For this reason, the proposal *could* significantly impact existing or planned transportation facilities used by the subject parcel.

   Pursuant to OAR 660-012-0060(1), when a local government determines that allowed development could significantly affect any existing or planned transportation facility, the local government must put into place measures, as provided in OAR 660-012-0060(2), to assure that the allowed land uses are consistent with the identified function, capacity and performance standards (level of service, volume to capacity ratio, etc.) at the facility.

   Subsection 2.e of the TPR states that such measures can include, "Providing other measures as a condition of development ...including transportation system management measures, demand management or minor transportation improvements." This list is non-restrictive and has been held to allow trip caps. *Willamette Oaks, LLC v. City of Eugene*, 248 Or App 212, 225 (2012). *Willamette Oaks* also held that a trip

cap imposed on development allowed by a land use amendment can satisfy the TPR requirements.

Therefore, in order to ensure that any residential development allowed by the proposed amendments would not significantly affect any existing or planned transportation facility, the City is proposes to add the following conditions to the proposed redesignation and rezone:

a. The maximum development on the total acreage of the Oaklea site shall be limited so that it would not generate more than 743 PM Peak hour vehicle trips, as determined by the ITE Trip Generation Manual.

b. Any Master Plan application for the Oaklea site shall include an ODOT scoped approved Traffic Impact Analysis (TIA) to monitor potential traffic impacts allowed by the proposed master plan and ensure it would do not exceed the 743 PM Peak hour vehicle trip cap (total of entering and exiting PM Peak hour trips). The trip cap shall be further monitored by City and enforced upon receipt of development applications. Trips shall then be allocated from the trip cap to the number of trips associated with a particular use at the time a development permit is issued for that use.

c. After all trips within the trip cap have been allocated, no further development of the Oaklea site can occur unless the trip cap is increased. The City may allow development intensity beyond this maximum number of Peak hour vehicle trips only if a future applicant submits to the City an ODOT scoped and approved Traffic Impact Analysis that demonstrates that the proposed intensification of use would be consistent with the TPR. Any such applicant shall seek and City shall consider such approval using the City's Type II Land Use Application procedure.

d. The trip cap shall sunset upon the occurrence of one of the three following conditions: 1) the applicant prepares an ODOT approved TPR compliant Traffic Impact Analysis, demonstrating no significant affect will occur from reasonable worst case scenario under the Residential zoning, as compared to the Professional Technical zoning, 2) if a significant affect will occur, the applicant shall mitigate any associated traffic impacts as required by the TPR and approved by ODOT; or 3) a Transportation System Plan update mitigating significant impacts and satisfying TPR requirements is completed and adopted by the City. The imposition of this trip cap satisfies the TPR and Goal 12 requirements.

3. Amendments to the Junction City Comprehensive Plan text and map to expand the City's Urban Growth Boundary and designate lands Commercial, Residential, and Public.

A TPR analysis of transportation facility impacts caused by urban growth boundary expansions may be deferred by administrative rule. OAR 660-024-0020(d), specifically states:

> *"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."*

The City chooses to apply this deferral option, and has informed ODOT of its choice. A letter in the Customized Periodic Review record, dated July 18, 2011, from Savannah Crawford, ODOT Region 5 Planner, indicates that ODOT has "no objections to the proposed expansion at this time." The letter goes on to note that the either individual property owners or the City will have to complete additional work to comply with the Transportation Planning Rule (OAR 660-012).

Comments have been submitted expressing concern over the proposed UGB expansion on the basis that big box stores potentially generate upwards of 10,000 individual trips per day. As an initial and primary response, these comments raise goal 12 concerns. The City's goal 12 findings are set forth above. The comments received do not dispute or undermine the City's goal 12 findings, and, therefore, the City will continue to rely upon them as showing that this proposal complies with goal 12.

As a second response, the proposed UGB expansion does not address any specific development application nor "rezone", as referenced in the comments. No traffic impacts can be estimated, as the specific land uses for the properties proposed for UGB expansion have not been determined at this time.

As a final point, while inapplicable to this proposal, the comments make an undocumented claim about the number of trip commercial areas can generate. It is anticipated that trips "to" any future South Junction City commercial center would already be passing by such a commercial development, and thus would not constitute new net trips generated by the development. Pass-by trips are made by traffic already using the adjacent roadway which enter the site as an intermediate stop on the way

to or from another destination. The trip is therefore not "generated" by the land use under study, and thus, not a new trip added to the transportation system. This pass-by factor should be taken into account in evaluating any future potential traffic impacts. See *Trips Generation Manual, 8th Edition.*

The above demonstrates that the estimate of 10,000 trips is inappropriate, as no development or rezone is proposed, and no decisions have been made as to tenant type or size. Further, the estimate is inaccurate assuming any development occurs on that site. These issues should and will be more fully evaluated in the City's TSP.

The City recognizes the need for this analysis, and has accordingly postponed applying municipal zoning to several of the sites included in the UGB expansion until the City completes work on its Transportation System Plan (TSP). Junction City initiated an update of its TSP in 2010 and is including the proposed expansion areas as part of the TSP modeling efforts. In short, the City will address the TPR requirements through its ongoing TSP update.

Based on this analysis, Goal 12 has been 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 through 5 of this report.

In addition, the City's Urban Growth Management Agreement, as required under OAR 660-011-0015, is included as Attachment 17.

The proposed UGB expansion does not include rezoning properties. As such, the City is deferring analysis of compliance with OAR 660-024-0060(8)(c) to a later date, when the property is rezoned.

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. However, Junction City's EOA identifies a 62-acre need for commercial land.
- Need for a site for a sub-regional commercial center can be accommodated on lands evaluated in High-Value Study Area 3. This site meets the site requirements for a commercial center, as described in section 4 of this document.
- General commercial land need can be met through a combination of exceptions areas (7.7 acres), redevelopment (12.0 Acres), and agricultural lands (9.5 acres).
- The need for 16 acres for medium-density housing can be met on exceptions areas.
- The need for a 10-acre community park can be met on priority 2 lands under the ORS 197.298 priority scheme.

City of Junction City
P.O. Box 250
Junction City, OR 97448-0250
(541) 998-2153

DATE	INVOICE NO
2/18/2014	9010105

BILL TO
Building Codes Division FACS Manager P.O. Box 14470 Salem, OR 97309-0405

DUE DATE
3/1/2014

DESCRIPTION	QUANTITY	EFFECTIVE RATE	AMOUNT	DISCOUNT	CREDIT	BALANCE
PREVIOUS ACCOUNT BALANCE						23,332.62
Clair Invoice #99-372090:						
Development Cost - Planning	1.00	749.00	749.00	0.00	0.00	749.00
		INVOICE TOTAL:	**749.00**	**0.00**	**0.00**	**749.00**

PLEASE DETACH BOTTOM PORTION & REMIT WITH YOUR PAYMENT

For questions please contact us at (541) 998-2153

DUE DATE	INVOICE NO
3/1/2014	9010105

Customer Name: Building Codes Division
Customer No: 008534
Account No: 0000144 - State Hosp. Code Review

Please remit payment by the due date to:

City of Junction City
680 Greenwood Street
P.O. Box 250
Junction City, OR 97448-0250

Invoice Total:	749.00
Discounts:	0.00
Credit Applied:	0.00
Ending Balance:	24,081.62
INVOICE BALANCE:	**$749.00**
AMOUNT PAID:	

Contract Services Invoice

Department of Consumer & Business Services
Building Codes Division
1535 Edgewater NW, Salem, OR
Mailing address: P.O. Box 14470, Salem, OR 97309-0404
(503) 378-4133, Fax: (503) 378-2322, TTY: (503) 373-1358
bcd.oregon.gov

CITY OF JUNCTION CITY
Name of contractor (please print)

IGA #90G000200
Contract number

NONE
Contract expiration date

I. SERVICE DETAIL

Date	Description	Billable hours	Rate	Total amount
1/2014	PROJECT MANAGER	6.5	85.-	552.50
1/2014	CODE CONSULTANT	1.75	78.-	136.50
1/2014	PROJECT ADMIN/DOCUMENT CONTROL	1.25	48.-	60.00
			Total:	749.00

II. PRIVATE VEHICLE MILEAGE

Date	From	To	Rate per mile	Vehicle miles	Amount
				Mileage total:	

III. MISCELLANEOUS EXPENSES

Date	Description of expense	Amount
	Miscellaneous total:	

DEPARTMENT OF CONSUMER & BUSINESS SERVICES

CITY OF JUNCTION CITY

Name of contractor (please print)

IGA #906000200

Contract number

NONE

Contract expiration date

IV. CONTRACT TOTALS

Notes		Amount
	Grand total invoice:	749.00
	Contract amount:	
	Billed to date (including this invoice):	24081.62
	Balance available:	

Signature of contractor: Date:

DEPARTMENT USE ONLY

Approved:

By: _____ Date: _____

Comments:

This space reserved	PCA	Agency obj.	Amt.

INVOICE PER PROJECT

PO BOX 2370
CORVALLIS, OR 97339-2370
541-758-1302

DATE	INVOICE #
1/30/2014	99-372090

BILL TO
CITY OF JUNCTION CITY 680 GREENWOOD STREET JUNCTION CITY, OR 97448

TERMS	DUE DATE	ACCOUNT #	PROJECT
Net 30	3/1/2014	1272-000	1272-002 - Coordination Servi...

SERVICED	DESCRIPTION	HOURS/MILES	RATE	AMOUNT
	BILLING STATEMENT FOR PLAN REVIEW AND INSPECTION SERVICES PROVIDED ON BEHALF OF THE CITY OF JUNCTION CITY, OREGON			0.00
	PROJECT COORDINATION SERVICES, IGA & FEE METHODOLOGY REVIEW AND REPORTING, COORDINATION WITH CITY REGARDING PACKAGE 3 PRE-PERMITTING QUESTIONS AND DOCUMENTATION WITH BCD, DESIGNERS AND CONTRACTORS			
	Project Manager	6.5	85.00	552.50
	Code Consultant	1.75	78.00	136.50
	Project Admin/Document Control	1.25	48.00	60.00

BALANCE DUE **$749.00**

City of Junction City
P.O. Box 250
Junction City, OR 97448-0250
(541) 998-2153

DATE	INVOICE NO
2/18/2014	9010104

BILL TO
Oregon State Hospital Ron Monteferrante CH2M HILL 92213 Dreas Way Junction City, OR 97448

DUE DATE
3/1/2014

DESCRIPTION	QUANTITY	EFFECTIVE RATE	AMOUNT	DISCOUNT	CREDIT	BALANCE
PREVIOUS ACCOUNT BALANCE						11,877.63
Clair Invoice #99-372089:						
Development Cost - Planning	1.00	752.50	752.50	0.00	0.00	752.50
		INVOICE TOTAL:	**752.50**	**0.00**	**0.00**	**752.50**

PLEASE DETACH BOTTOM PORTION & REMIT WITH YOUR PAYMENT

For questions please contact us at (541) 998-2153

DUE DATE	INVOICE NO
3/1/2014	9010104

Customer Name: Oregon State Hospital
Customer No: 008950
Account No: 0000148 - Oregon State Hospital

Please remit payment by the due date to:

City of Junction City
680 Greenwood Street
P.O. Box 250
Junction City, OR 97448-0250

Invoice Total:	752.50
Discounts:	0.00
Credit Applied:	0.00
Ending Balance:	12,630.13
INVOICE BALANCE:	**$752.50**
AMOUNT PAID:	_____

INVOICE PER PROJECT

PO BOX 2370
CORVALLIS, OR 97339-2370
541-758-1302

DATE	INVOICE #
1/30/2014	99-372089

Forward to Applicant - CH2M-Hill

BILL TO
CITY OF JUNCTION CITY 680 GREENWOOD STREET JUNCTION CITY, OR 97448

TERMS	DUE DATE	ACCOUNT #	PROJECT
Net 30	3/1/2014	1272-000	1272-001-1 - Out of Scope Pla...

SERVICED	DESCRIPTION	HOURS/MILES	RATE	AMOUNT
	BILLING STATEMENT FOR PLAN REVIEW AND INSPECTION SERVICES PROVIDED ON BEHALF OF THE CITY OF JUNCTION CITY, OREGON			0.00
	INCLUDING: ASI'S, ADDENDUMS, RFI'S, DEFERRED SUBMITTALS, AND REVIEWS BEYOND THE FIRST BACK CHECK - SEE ATTACHED DETAIL			
	Project Manager	2	65.00	130.00
	Plans Examiner/Tech Support	8.25	60.00	495.00
	Project Admin/Document Control	3.75	34.00	127.50

BALANCE DUE **$752.50**

CLAIR COMPANY, INC

December 2013

Date	Duration	Notes	Details
1272-000 JC DOC:1272-001-1 - Out of Scope Plan Review			
ADMINISTRATION:A2 Project Admin			
12/02/2013	0.25	Project Admin/Document Control (KC)	ASI 52
12/02/2013	0.25	Project Admin/Document Control (KC)	ASI #35, 38, 40, 36
12/02/2013	0.25	Project Admin/Document Control (KC)	ASI #43, 42, 38.1, 39
12/04/2013	0.50	Project Admin/Document Control (MH)	out of scope review time/budget tracking
12/10/2013	0.50	Project Admin/Document Control (KC)	ASI #54
12/11/2013	0.25	Project Admin/Document Control (KC)	ASI 54
12/16/2013	0.50	Project Admin/Document Control (AF)	ASI 43, 52
12/23/2013	0.50	Project Admin/Document Control (MH)	out of scope review time/budget tracking
12/24/2013	0.50	Project Admin/Document Control (KC)	ASI #51
12/27/2013	0.25	Project Admin/Document Control (KC)	ASI #59
Total ADMINISTRATIO	3.75		
CODE CONSULT/PLANS EXAM:C3 Plans Examiner/Tech Support			
12/10/2013	1.00	Plans Examiner/Tech Support (DC)	ASI #52
12/11/2013	0.75	Plans Examiner/Tech Support (RM)	ASI 54
12/13/2013	0.50	Plans Examiner/Tech Support (RM)	Siphonic Drain Changes (Hoffman, HydroTemp)
12/16/2013	0.50	Plans Examiner/Tech Support (RM)	Siphonic Drain Changes (HydroTemp)
12/17/2013	0.50	Plans Examiner/Tech Support (RM)	Siphonic Drain Changes (HydroTemp)
12/19/2013	1.50	Plans Examiner/Tech Support (RM)	Siphonic Drain Changes (HydroTemp)
12/20/2013	2.00	Plans Examiner/Tech Support (DC)	ASI #54
12/27/2013	1.25	Plans Examiner/Tech Support (RM)	ASI 51
12/27/2013	0.25	Plans Examiner/Tech Support (DEF)	ASI 51
Total CODE CONSULT	8.25		
PROJECT MGMT & PROFESSIONALS:P4 Project Manager			
12/11/2013	0.50	Project Manager (AC)	ASI 54
12/12/2013	0.25	Project Manager (MB)	ASI 54
12/16/2013	1.00	Project Manager (DEF)	ASI 43, 52, Siphonic Drain
12/27/2013	0.25	Project Manager (MLB)	ASI 59
Total PROJECT MGMT	2.00		
Total 1272-000 JC DOC:1	14.00		
TOTAL	**14.00**		