CITY OF GRANTS PASS AND JOSEPHINE COUNTY

GRANTS PASS URBAN GROWTH MANAGEMENT PLANNING

(UGB AMENDMENT, URBAN RESERVE DESIGNATION, COMPREHENSIVE PLAN AMENDMENTS, DEVELOPMENT CODE AND ZONING MAP AMENDMENTS, INTERGOVERNMENTAL AGREEMENTS)

FINDINGS OF FACT - URBAN AREA PLANNING COMMISSION

Project Numbers:	***14-405000008.a-c. Comprehensive Plan and Development Code Text Amendments and Intergovernmental Agreements*** **Comprehensive Plan Text Amendments** • Josephine County Coordinated Population Forecast Update* • Grants Pass Comprehensive Plan: Population Element 6 Update (Addendum 1) • Grants Pass Comprehensive Plan: Housing Element 9 Update (Addendum 1) • Grants Pass Comprehensive Plan: Economic Element 8 Update (Addendum 1) • Grants Pass Comprehensive Plan: Urbanization Element 14 Update (Addendum 2) • Grants Pass Comprehensive Plan: Amendment to Element 13 Policies and Procedures, UGB and Urban Reserve Criteria and Procedures; Internal Consistency with Efficiency Measures **Development Code Text Amendments** • Development Code Text Amendments and Efficiency Measures **Intergovernmental Agreements (IGAs)** • Interim Intergovernmental Agreement (IGA) for UGB Expansion Areas • Intergovernmental Agreement (IGA) for Urban Reserve Areas ***14-40400001.a-b. Urban Growth Boundary (UGB) Amendment and Urban Reserve Boundary Designation*** • UGB Amendment and Urban Reserve Boundary Designation see also Urbanization Element 14 Update (Addendum 2) ***14-40200003.a-c. Comprehensive Plan Map & Zoning Map Amendments*** • UGB Comprehensive Plan Map Amendments (UGB Expansion Areas) see also Urbanization Element 14 Update (Addendum 2) • Urban Reserve Land Use Allocations and Map see also Urbanization Element 14 Update (Addendum 2) • Comprehensive Plan and Zoning Map Amendments and Overlay in Current UGB see also Urbanization Element 14 Update (Addendum 2)
Project Type:	• Comprehensive Plan and Development Code Text Amendments • UGB Amendment and Urban Reserve Boundary Designation • Comprehensive Plan Map and Zoning Map Amendments • Intergovernmental Agreements
Procedure Type:	***UGB Amendment and Urban Reserve Boundary Designation:*** Type V: Urban Area and Rural Planning Commission Recommendations, Joint City Council & Board of County Commissioners Decision** ***Comprehensive Plan and Development Code Text Amendments:*** Type IV: Urban Area Planning Commission Recommendation and City Council Decision***

	Comprehensive Plan Map and Zoning Map Amendments: Type IV: Urban Area Planning Commission Recommendation and City Council Decision* ***Intergovernmental Agreements:*** Joint City Council & Board of County Commissioners decision (no Planning Commission recommendation) *See Section II for an Action Summary Table*
Applicant:	City of Grants Pass & Josephine County
Planner Assigned:	Tom Schauer
Application Received:	August 29, 2014
Application Complete:	August 29, 2014
Date of Staff Report:	October 1, 2014
Date of Planning Commission Hearing:	October 8, 2014
Date of Planning Commission Findings:	October 22, 2014

** Josephine County Coordinated Population Forecast Update is a separate item with recommendation by the Rural Planning Commission and decision by the Josephine County Board of Commissioners.*
***Procedure is the same as Type IV, but joint decision of City Council & Board of County Commissioners.*
****For Type IV decisions, the County has automatic party status.*

I. PROPOSAL:

The proposal includes the following items. They are also summarized in ***Exhibit 1.***

14-40500008.a. Comprehensive Plan Text Amendments:

14-40500008.a.1. County Coordinated Population Forecast Update. This amendment updates the previously adopted Josephine County Coordinated Population Forecast, including the forecasts for the Grants Pass and Cave Junction urban areas based on the new long-range forecast for Josephine County issued by the Oregon Office of Economic Analysis (OEA) in 2013. The updated forecast is for slower growth for the county as a whole and for both the Grants Pass and Cave Junction urban areas. *(This item was considered by the Rural Planning Commission at an October 6 hearing and will be considered by the Board of County Commissioners at the November 12 hearing. Josephine County is providing separate notice for this item).*

14-40500008.a.2. Population Element 6 Update (Addendum 1). Updates the Population Element of the Grants Pass Comprehensive Plan consistent with the updated County Coordinated Population Forecast

14-40500008.a.3. Housing Element 9 Update (Addendum 1). Updates the Housing Element of the Grants Pass Comprehensive Plan consistent with the updated County Coordinated Population Forecast.

14-40500008.a.4. Economic Element 8 Update (Addendum 1). Updates the Economic Element of the Grants Pass Comprehensive Plan consistent with the updated County Coordinated Population Forecast; also updates the Economic

Opportunities Strategy, which has the effect of including less land for employment use in the UGB and Urban Reserve.

14-40500008.a.5. Urbanization Element 14 Update (Addendum 2). Updates the Urbanization Element of the Grants Pass Comprehensive Plan consistent with the updated Population, Housing, and Economic Elements; also updates the Buildable Lands Inventory (BLI); provides an updated summary of the land needs and alternatives; designates the amended Urban Growth Boundary location and Comprehensive Plan designations for those areas; and designates the Urban Reserve Boundary location and associated land use allocations and concepts necessary to conduct long-range infrastructure planning.

14-40500008.a.6. Amendment to Grants Pass Comprehensive Element 13 (Policies): UGB and Urban Reserve Criteria and Procedures; Internal Consistency with Efficiency Measures. Amends the Comprehensive Plan to incorporate local provisions and procedures for adoption and amendment of Urban Reserves consistent with state law, and pertaining to criteria for prioritization of resource land inclusion in the UGB and Urban Reserves; amendments for internal consistency with efficiency measures.

14-40500008.b. Development Code Text Amendments and Efficiency Measures. Amends provisions in several chapters of the Development Code to implement the efficiency measures policies in the Urbanization Element, including amendments to Sections 4, 12, 14, 18, 19, 22, 25, 30.

14-40500008.c. Intergovernmental Agreements (IGAs):

14-40500008.c.1. Interim IGA for UGB Expansion Areas. *Interim intergovernmental agreement specifying management of UGB expansion areas while they retain rural zoning.* Applies in UGB expansion areas until decisions are made about policy and timing of rural to urban rezoning in these areas. Will remain in effect and apply to properties with County rural zoning in UGB expansion areas until adoption of a permanent IGA for these areas or application of the current IGA for the Urban Growth Boundary through urban rezoning.

Comprehensive Plan Map designations will be adopted at the time of the UGB amendment; however, properties will retain County rural zoning, and Josephine County will continue to administer the zoning, Rural Land Development Code, and Building Code in UGB expansion areas, subject to coordination provisions specified in the agreement. (While some limited rezoning could occur within expansion areas sooner, most rural to urban rezoning wouldn't occur at least until infrastructure plans have been updated, estimated at 18 months to 2 years, but these plans could be completed in a shorter or longer time. Policy options range from (a) rezoning most or all areas at that time to (b) phasing in urban zoning over the long-term. Those decisions will be considered during the next year concurrent with work on the infrastructure plan updates).

14-40500008.c.2. IGA for Urban Reserve Areas. *Intergovernmental agreement specifying management of Urban Reserve areas.* Applies to lands in Urban Reserve areas until such future time as they are brought into the UGB, when the applicable UGB Intergovernmental Agreement would apply. Properties will retain County rural zoning, and Josephine County will continue to administer the zoning, Rural Land

Development Code, and Building Code in Urban Reserve areas, subject to additional provisions specified in the agreement. Additional provisions provide for coordination and consideration of future efficient provision of infrastructure and urbanization. Some provisions allow for additional cluster development options in certain circumstances.

14-40400001.a&b. Urban Growth Boundary (UGB) Amendment and Urban Reserve Boundary Designation. Amends the UGB and designates an Urban Reserve Boundary. After accounting for policies and measures to reduce the size of the needed UGB amendment and Urban Reserve boundary, the expansion needs are as follows:

Boundary	Acres		
	Total Acres in Boundary	**Acres in Tax Lots[1]**	**Buildable Acres[2]**
UGB Amendment *(From Present Through 2033)*	765	659	510
Urban Reserve Boundary *(2033-2043)*	+656	+611	+496
UGB & Urban Reserve *(From Present Through 2043)*	**=1,421**	**=1,270**	**=1,006**

[1]Acres in Tax Lots=Total Acres less public right-of-way, railroad, Rogue River, etc.
[2]Buildable Acres=Acres in Tax lots less constraints such as existing development, streams, wetlands, slopes, etc.

14-40400001.a. UGB Amendment. The UGB is intended to meet forecast needs through 2033. 76% of the need through 2033 is expected to be met inside the current UGB (62% on vacant and partially vacant land and 14% through infill and redevelopment). The UGB expansion is expected to meet the remaining 24% of the need through 2033. Properties in UGB expansion areas will retain their rural zoning at this time, and urban zoning will not be applied at this time. The Interim Intergovernmental Agreement (IGA) for the UGB expansion areas provides for Josephine County to continue to administer the Rural Land Development Code and Building Codes while these properties retain rural zoning and to provide for coordination with the City of Grants Pass. The interim IGA will be replaced with a permanent IGA at a future date in conjunction with policy regarding rural to urban zoning.

14-40400001.b. Urban Reserve Boundary Designation. The Urban Reserve areas are intended to meet future UGB expansion needs for an additional 10 years from 2033-2043. Urban Reserves are first priority when considering future UGB expansion and provide greater certainty about the direction of growth and associated public infrastructure investments. Designation of Urban Reserve areas helps facilitate cost-effective long-range infrastructure planning. Properties in Urban Reserve areas will retain rural zoning, and urban zoning won't be applied before these lands are included in the UGB. This would occur though a future public review process and determination of need for additional UGB expansion. The Intergovernmental Agreement (IGA) the Urban Reserve areas provides for Josephine County to continue to administer the Rural Land Development Code and Building Codes and to provide for coordination with the City of Grants Pass, subject to additional provisions which also consider future infrastructure and allow limited cluster development options in certain circumstances.

14-40200003. Comprehensive Plan Map and Zoning Map Amendments:

14-40200003.a. UGB Comprehensive Plan Amendments (UGB Expansion Areas). Amends the Comprehensive Plan Map designations from rural to urban designations for UGB expansion areas. The Comprehensive Plan map is a more general map that guides zoning. Zoning must be consistent with the Comprehensive Plan. The Comprehensive Plan Map Designations will be amended at this time to specify future urban zoning. However, properties will retain County rural zoning at this time, and Josephine County will continue to administer the zoning, Rural Land Development Code, and Building Code in UGB expansion areas, subject to coordination provisions specified in the agreement.

14-40200003.b. Urban Reserve Land Use Allocations and Map. Allocates future land use allocations to Urban Reserve areas to identify areas planned and prioritized for future land uses and to facilitate efficient future provision of infrastructure. The maps and land use allocations to the Urban Reserve areas facilitate infrastructure planning by identifying future direction, location, intensity, and type of growth for which infrastructure must be sized. They are not intended as property-specific comprehensive plan land use maps with the same meaning as the designations inside the UGB. The needed buildable acres for the Urban Reserve areas could potentially be reallocated within each of the respective areas in different configurations, and those decisions will need to be made at such future time as Urban Reserve lands are included in the UGB, through future review, needs determination, and noticed public processes.

14-40200003.c. Comprehensive Plan and Zoning Map Amendments and Overlay in Current UGB. As part of the growth management planning for the next 20 years, the work includes amendments to the Comprehensive Plan Map and Zoning Map for lands inside the current Urban Growth Boundary (UGB) to allow for greater use of properties, better balancing land use for the community as a whole. This item only applies to lands within the current UGB, not to properties outside the current UGB. This would amend the Comprehensive Plan Map and Zoning Map for approximately 591 tax lots totaling approximately 450 acres.

To comply with requirements of state law (the 'Transportation Planning Rule'), the map amendments will be implemented in two phases.

1. First Phase (Effective Upon Adoption).

- The Comprehensive Plan Map Designations will be amended at this time. (The Comprehensive Plan map is a more general map that guides zoning. Zoning must be consistent with the Comprehensive Plan).

- The subject properties will keep their current zoning and can still be used and developed in accordance with the current zoning and standards. In addition, an overlay zone will be created that provides additional options for the subject properties to develop in accordance with the new overlay zoning, subject to the following.

- If the traffic generation of a proposed use or development permitted by the new zoning would exceed the traffic generation that could occur under the current zoning, the applicant would need to conduct the same type of traffic analysis that would be required for the Comprehensive Plan Map Amendment and provide the same type of mitigation. Typically, traffic

analysis and mitigation for a permitted use is based on 'opening day' of the use. Typically, traffic analysis and mitigation for a Comprehensive Plan Amendment must be based on 20-year future conditions.

2. **Second Phase (Effective in Approximately 18 Months to 2 Years)**
   - As part of the growth management planning for the next 20-years, the Transportation System Plan (TSP) will be updated based on the land use planning. The plan will identify necessary transportation projects for the planning period based on future land use assumptions. That work may take between 18 months and 2 years, but could be completed in a shorter or longer time. Once the TSP has been adopted, the overlay zoning will become the new zoning for the subject properties, and the old zoning will be phased out.

3. Some changes will result in some different permitted uses and development standards. For example, a change from residential to commercial zoning could allow commercial use and development, but could limit some new residential uses if they aren't provided together with commercial use. Some of the changes won't affect development standards such as building height or setbacks; however, some changes will affect development standards. Typically, they will allow greater use of the property (e.g. reduced setback requirements, taller height limits). If there are changes that affect permitted uses, existing uses and development which continue remain 'grandfathered'.

   - The traffic analysis that would be required after adoption of the TSP for the use and development permitted by the new zoning would only require 'opening day' traffic analysis and mitigation.

Comprehensive Plan Map	Overlay/ Zoning Map	Approximate Acres	Approximate # of Tax Lots
From LR to MR	From R-1-8 to R-2	69.83	83
From LR to HR	From R-1-10 to R-3-2	17.63	42
	From R-1-8 to R-3-2	4.72	2
From LR to HRR	From R-1-8 to R-4-2	31.51	23
From LR to GC	From R-1-10 to GC-2	4.90	7
	From R-1-8 to GC-2	8.66	9
MR (no change)	From R-1-6 to R-2	11.07	18
From MR to HR	From R-2 to R-3-2	105.89	213
From MR to HRR	From R-2 to R-4-2	12.43	25
From MR to GC	From R-2 to GC-2	0.06	1
From HR to HRR	From R-3 to R-4-2	175.51	159
From HR to GC	From R-3 to GC-2	6.07	7
From GC to MR	From GC to R-2	0.39	1
From GC to HRR	From GC to R-4-2	1.24	1
SUM		***449.91***	***591***

The combined net result of the proposed changes is shown below:

		To															
		LR						MR				HR		HRR		GC		
		R-1-12		R-1-10		R-1-8		R-1-6		R-2		R-3		R-4		GC		SUM (From)	
From		Ac.	TLs	Ac.	TLs	Ac.	TLs	Ac.	TLs	Ac.	TLs	Ac.	TLs	Ac.	TLs	Ac.	TLs	Ac.	TLs
	R-1-12																		
	R-1-10											17.63	42			4.9	7	*22.53*	*49*
LR	R-1-8									69.83	83	4.72	2	31.51	23	8.66	9	*114.72*	*117*
	R-1-6									11.07	18							*11.07*	*18*
MR	R-2											105.89	213	12.43	25	0.06	1	*118.38*	*239*
HR	R-3													175.51	159	6.07	7	*181.58*	*166*
HRR	R-4																		
GC	GC									0.39	1			1.24	1			*1.63*	*2*
	SUM (To)									*81.29*	*102*	*128.24*	*257*	*220.7*	*208*	*19.69*	*24*	*449.91*	*591*

II. AUTHORITY, PROCEDURES, AND CRITERIA:

The authority, review procedures, and locally adopted criteria for the amendments are provided in the Comprehensive Plan, Development Code, and the Intergovernmental Agreement as specified below. Criteria for the amendments are also provided in applicable state law. Those criteria are addressed together with the local criteria, which reference consistency with applicable state law, in Sections VII and VIII of these findings.

SUMMARY OF REVIEW BODY ACTIONS AT HEARINGS:

Separate votes are taken on the items that are part of the proposal. The table below summarizes which items each review body takes action on, based on the governing provisions of the Comprehensive Plan and Intergovernmental Agreement which are described in detail following the summary table.

	Makes Recommendation?		Makes Decision?	
Item	Rural Planning Commission	Urban Area Planning Commission	City Council	Board of County Commissioners
1. County Coordinated Population Forecast Update	**Yes***	-	-	**Yes**
2. Comprehensive Plan and Development Code Text Amendments	-	**Yes**	**Yes**	-
3. Comprehensive Plan Map and Development Code Map Amendments	-	**Yes**	**Yes**	-
4. UGB Amendment & Urban Reserve Boundary Designation	-	**Yes**	**Yes**	**Yes**
5. Intergovernmental Agreements (IGAs)	-	-	**Yes**	**Yes**

**Separate Hearing*

CRITERIA:

The recommendations and decisions shall be based on the following criteria:

- **For the Josephine County Coordinated Population Forecast Update:** *This is addressed separately in a staff report from the Josephine County Planning Department.*

- **For the Comprehensive Plan Amendments:** Section 13.5.4 of the Comprehensive Plan (for map and text amendments)

- **For the Development Code Amendments:** Sections 4.033 (for zoning map amendments) and 4.103 (for text amendments) of the Development Code

- **For the UGB Amendment:** Statewide Planning Goal 14 (OAR 660-015-0000(14), ORS 197.298, Urban Growth Boundaries Administrative Rule (OAR 660 Division 24), Section 13.6.3 of the Comprehensive Plan

- **For the Urban Reserve Boundary Designation:** Statewide Planning Goal 14 (OAR 660-015-0000(14), ORS 195.145, Urban Reserves Administrative Rule (OAR 660 Division 21)

- **For the Intergovernmental Agreements (IGAs):** The management provisions are not land use decisions subject to land use decision approval criteria. They relate to the land use decisions being considered; therefore, they are being considered at the same time. For substantive provisions: Section 13.5.4 of the Comprehensive Plan and Section 4.103 of the Development Code as applicable.

HEARING PROCEDURES:

The hearings are subject to Legislative Hearing guidelines in Article 9 of the Development Code.

PROCEDURE TYPES:

- **For the Josephine County Coordinated Population Forecast Update:** *This is addressed separately in a staff report from the Josephine County Planning Department. (Recommendation by Rural Planning Commission. Decision by Josephine County Board of Commissioners).*

- **For the Comprehensive Plan Amendments:** Type IV. (Recommendation by Urban Area Planning Commission. Decision by City Council. Josephine County has automatic party status).

- **For the Development Code Amendments:** Type IV. (Recommendation by Urban Area Planning Commission. Decision by City Council. Josephine County has automatic party status).

- **For the UGB Amendment:** Type V. (Recommendation by Urban Area Planning Commission. Decision by City Council and Josephine County Board of Commissioners).

- **For the Urban Reserve Boundary Designation:** Type V. (Recommendation by Urban Area Planning Commission. Decision by City Council and Josephine County Board of Commissioners).

- **For the Intergovernmental Agreements (IGAs):** Decision by City Council and Josephine County Board of Commissioners.

COORDINATION OF 1998 INTERGOVERNMENTAL AGREEMENT, COMPREHENSIVE PLAN, AND DEVELOPMENT CODE:

Type V:
Section IV.4 of the 1998 Intergovernmental Agreement states:

> The County and City shall jointly adjust the Grants Pass Urban Growth Boundary using the procedures currently contained in Section 13.6 of the Grants Pass and Urbanizing Area Comprehensive Community Development Plan Policies, or as hereafter mutually modified by the two governing bodies.

Sections 13.6.6 and 13.8 of the Comprehensive Plan provide that joint review by the City Council and Board of County Commissioners shall be required for amendment to the Urban Growth Boundary. This is a Type V procedure. A Type V procedure is the same as a Type IV procedure, except it is a joint decision by the City Council and Board of County Commissioners

Section 13.8.3 of the Comprehensive Plan provides that notice for a Type V procedure shall be as provided in Section 2.060 of the Development Code for a Type IV procedure. Section 13.8.3 further provides that the hearing shall be conducted in accordance with the Legislative Hearing Guidelines of Section 9 of the Development Code.

Type IV:
Sections 13.5.5 and 13.8 of the Comprehensive Plan provide that joint review by the City Council and Board of County Commissioners shall be required for amendment and revision to Comprehensive Plan findings, goals, and policies.

The review shall be in accordance with the procedures of Section 13.8.3 of the Comprehensive Plan, which provides for a recommendation hearing by the Urban Area Planning Commission prior to a joint hearing of the City Council and Board of County Commissioners.

However, with adoption of the 1998 Intergovernmental Agreement, this provision requiring a joint hearing is modified with the result that City Council will make the decision, and the County will have automatic party status, as summarized below:

> Section III of the 1998 Intergovernmental Agreement (IGA) provides for transfer of authority for provision and management of planning services from the County to the City for the Urbanizing Area. It provides:
>
> > *The City is hereby vested with the exclusive authority to exercise the County's legislative and quasi-judicial powers, rights, and duties within the Urbanizing Area…*

Section V of the IGA contains provisions pertaining to notification and appeals for quasi-judicial and legislative decisions within the Urbanizing Area. For legislative decisions, the IGA provides:

> *The City agrees to provide written notice of all proposed legislative actions to the County at least 45 days prior to the public hearing at which the action is first considered. The County shall be deemed to have automatic party status regarding all such decisions for the purposes of standing for appeals.*

Section 13.8.3 of the Comprehensive Plan provides that notice shall be as provided in Section 2.060 of the Development Code for a Type IV procedure. Section 13.8.3 further provides that the hearing shall be conducted in accordance with the Legislative Hearing Guidelines of Section 9 of the Development Code.

The Development Code specifies Type IV procedures for other items, including the Development Code text amendments and zoning map amendments.

Therefore, the applications will be processed through a "Type IV" procedure, with a recommendation from the Urban Area Planning Commission and a final decision by City Council. Josephine County has automatic party status.

Intergovernmental Agreements (IGAs):
While the IGAs will not affect the applicability of the 1998 IGA to properties already within the UGB with urban zoning, and the 1998 IGA is not amended as a result, the interim IGA is being considered consistent with the same procedures for amendment specified in the 1998 IGA.

> *"This agreement may be amended any time with the consent of the parties, provided 30 day written notice of the intention to amend is given to the Department of Land Conservation. Modifications in this agreement shall be deemed consistent with the applicable Comprehensive Plan and its various elements."*

Notification was provided to DLCD more than 30 days in advance of the hearing. The City Council and Board of Commissioners may modify the Intergovernmental Agreement or adopt an Intergovernmental Agreement, and this action doesn't require a recommendation from the Rural Planning Commission or Urban Area Planning Commission. There are no specific land use criteria for adoption or amendment. The agreements are consistent with provisions of ORS 190 and 195 and OAR 660 Division 021.

III. APPEAL PROCEDURE (NOTICE AND FILING OF OBJECTIONS):

The amendments are submitted to DLCD "in the manner of periodic review" as provided in OAR 660-024-0080 and OAR 660-025-0175. (The City and County are not in formal periodic review).

1. In accordance with OAR 660-025-0140, after the City makes a final decision on the work task, the City must notify DLCD and persons who participated at the local level

orally or in writing or who requested notice in writing. The notice must contain the following information:

a. Where a person can review a copy of the City's final decision, and how a person may obtain a copy of the final decision;

b. The requirements listed in Section 2 below for filing a valid objection to the work task; and

c. That objectors must give a copy of the objection to the City.

2. Persons who participated at the local level orally or in writing during the local process leading to the final decision may object to the City's work task submittal. To be valid, objections must:

a. Be in writing and filed with DLCD's Salem office no later than 21 days from the date the notice was mailed by the City;

b. Clearly identify an alleged deficiency in the work task sufficiently to identify the relevant section of the final decision and the statute, goal, or administrative rule the task submittal is alleged to have violated;

c. Suggest specific revisions that would resolve the objection; and

d. Demonstrate that the objecting party participated at the local level orally or in writing during the local process.

IV. PROCEDURE:

A. The applications were submitted and deemed complete on August 29, 2014. The applications were processed in accordance with Type IV and Type V procedures in accordance with the Development Code, Comprehensive Plan, and Intergovernmental Agreement.

B. Notice of the proposed amendments, together with 'Form 1', was sent to the Oregon Department of Land Conservation and Development (DLCD) on August 29, 2014, in accordance with ORS 197.610 and OAR Chapter 660 Divisions 18 and 25, with updates on September 15, 16, and 19, 2014.

C. Notice was provided to departments and agencies on the City's 'Site Plan Review Committee' list on September 9, 2014, including public agencies which provide transportation facilities and services. Additional notice was also provided to public agencies which provide transportation facilities and services on September 19, 2014.

D. Notice was mailed to subject properties and tenants of manufactured home parks and to properties within a 250-foot notice area on September 18, 2014 in accordance with the Development Code and ORS 227.186 and ORS 215.503.

E. Notice was provided to interested parties on September 22 and 23, 2014.

F. Informational open houses were held on September 30 and October 2, 2014.

G. Notice was published in the newspaper on October 1, 2014.

H. A public hearing was held by the Urban Area Planning Commission on October 8, 2014 to consider the proposal and make recommendations to the City Council and Board of County Commissioners.

V. SUMMARY OF EVIDENCE:

A. The basic facts and criteria regarding this application are contained in the October 1, 2014 staff report and its exhibits, which are attached as Exhibit "A" and incorporated herein. (See staff report for detailed list of these items).
   1. Summary Materials
   2. Proposed Amendments
   3. UGB 'Latest News' Page Chronology and Documents
   4. Recommended Minor Revisions (submitted by staff)
   5. Record of Prior Proceedings, Submitted into the Record of Current Proceedings by Staff:
      a. Record of Proceedings Prior to 2013
      b. Materials After January 1, 2013, Prior to Initiation of Formal Application and Public Hearing Process
   6. Additional Recommended Revisions (submitted by staff)

B. The minutes of the public hearing held by the Urban Area Planning Commission on October 8, 2014, which are attached as Exhibit "B", summarize the oral testimony presented and are hereby adopted and incorporated herein.

C. The PowerPoint presentation given by staff at the October 8, 2014 hearing is attached as Exhibit "C" and incorporated herein.

D. Written Testimony Submitted from August 29, 2014 through Close of Public Hearing on October 8, 2014 is attached as Exhibit "D" and incorporated herein.
   1. October 7, 2014 Letter submitted by Josh LeBombard, DLCD Southern Oregon Regional Representative
   2. October 6, 2014 email from Stephen C. and Cynthia M. Siler
   3. October 6, 2014 letter from Donald and Amy Abernathy (submitted by Mark Abernathy at October 6, 2014 Rural Planning Commission hearing, and submitted by staff into record at October 8, 2014 Urban Area Planning Commission hearing).
   4. October 6, 2014 letter from Helen J. McCall (submitted by Mark Abernathy at October 6, 2014 Rural Planning Commission hearing, and submitted by staff into record at October 8, 2014 Urban Area Planning Commission hearing).
   5. October 7, 2014 letter from Douglas E. Sammis and Christine C. Sammis
   6. October 8, 2014 letter from Gary and Cortney Buckmaster
   7. October 8, 2014 letter from Shirley Liska
   8. October 8, 2014 letter from Robert Watts and Kay Watts
   9. Undated Letter with attachments from Mark Johnson and Kelly Johnson (Submitted October 8, 2014)

VI. BACKGROUND AND DISCUSSION:

This background is summarized for two major project phases: (1) work performed ***before 2013,*** and (2) work performed from ***2013 to present***. Section 4 of Urbanization Element Addendum 2 also summarizes the background for the study areas, suitability analysis, and alternatives analysis.

Much of the work was performed prior to 2013, and it was submitted as proposed amendments under separate land use applications. Comprehensive Plan amendments were originally adopted in 2008 and 2009, and hearings were held on the proposed UGB expansion in 2012, but it was not adopted at that time.

In early 2013, the Oregon Office of Economic Analysis (OEA) issued a new long-range forecast for Oregon and its counties. In 2013, the City Council and Board of County Commissioners provided direction through concurrent resolutions to revise the previous work to: develop and use a new county-coordinated forecast based on the new OEA forecast for Josephine County using the methodology specified in the resolution; scale the needs proportionally to the new forecast consistent with feedback from DLCD; plan for the 20-year UGB (2013-2033); plan for an Urban Reserve boundary for an additional 10-year period (2033-2043), (the minimum authorized by state law); and conduct the necessary conceptual planning to perform infrastructure planning for the 30-year period as authorized by state law. The City Council also passed a motion providing direction to plan for more rezoning of lands within the current UGB than provided for in the original proposal, as specified in the motion.

Since this is a new application for proposed amendments, but with much of the spatial analysis from the earlier proposals still applicable, staff submitted much of the previous record together with the current applications, together with the updates and new proposals.

Before 2013:

(Note: *All exhibit references for materials before 2013 refer to the previous record attached as Exhibit 5 to the staff report, and the exhibit numbers are a subset of the materials included in Exhibit 5 to the staff report. For example, Exhibit 2 means Exhibit 5.2 to the staff report, if not otherwise so numbered).*

Summary of Process

A UGB Steering Committee was created, and members appointed in 2006, to advise the Urban Area Planning Commission, Rural Planning Commission, City Council, and Board of County Commissioners on the work related to the UGB review. ***See Exhibit 5.2.***

Initial Public Workshop

A public workshop and survey were conducted in Spring 2007 to solicit public input on important issues and growth management ideas before proposals were developed. ***See Public Testimony Packet Sections III.1 and III.2.***

Needs Analysis and Alternatives Analysis

The project included two major phases of work: (1) the needs analysis, to determine how much land is needed to accommodate population and employment growth forecasts; and (2) the alternatives analysis, to determine how those land needs should be met.

Needs Analysis. In the needs analysis phase, public hearings were held for each of the following elements to update the Comprehensive Plans. Multiple hearings were held for some items.

- Josephine County adopted a county-wide coordinated population forecast (County Ordinance 2008-001, adopted in 2008).
- The City of Grants Pass adopted the following updated Comprehensive Plan elements:
    - Population (Ordinance 5432, adopted in 2008),
    - Economy (Ordinance 5433, adopted in 2008),
    - Housing (Ordinance 5437, adopted in 2008), and
    - Urbanization (Ordinance 5500, adopted in 2009).

The Urbanization Element brought together the needs analysis information from the previous documents, included the buildable lands inventory (BLI), identified a deficit of lands in the current UGB to meet the identified needs, and included policies for 'efficiency measures' the City would implement to reduce the amount of additional land needed for a UGB expansion. ***See Exhibit 5.9*** for a summary of the efficiency measures policies. The Urbanization Element provides the basis for what must be addressed with the UGB amendment. It identifies how much additional land is needed for the expansion, and how many buildable acres are required for different land use categories, including residential, commercial, and employment.

Following adoption, the Urbanization Element was submitted to the Oregon Department of Land Conservation and Development (DLCD). No objections were filed. DLCD Director Richard Whitman sent a February 24, 2010 letter to the City. In part, the letter states, "We did not receive any objections to the Urbanization Element and do not have any objections ourselves...At this time, any issues we may have with any of the documents already submitted are of a de minimis nature and do not warrant further discussion." ***See Exhibit 5.3.***

Alternatives Analysis. For the major tasks in the Alternatives Analysis phase, the UGB Steering Committee and the City conducted analysis in several steps. At each step, before making a recommendation to conduct the next stage of work, the Committee sought public input to help inform their recommendations. The key steps are summarized below. Public Open Houses were held to share information in a walk-through setting, together with surveys to obtain information on key issues. These were followed by public comment meetings to obtain input on the materials presented at the open houses and to share the results of the surveys.

1. **Define UGB Study Areas &**
2. **Draft Preliminary UGB Concepts**
    - June 2010 Open Houses (2)
    - Survey
    - July 14, 2010 Public Comment Meeting

3. **Draft UGB Concept (Public Comment Draft)**
    - April 2011 Open Houses (2)
    - Survey
    - May 25 and June 22, 2011 Public Comment Meetings

4. **Draft UGB Concept and Options Being Evaluated**
   - October 2011 Open Houses (2)
   - Survey
   - October 26, 2011 Public Comment Meeting

5. **Preliminary Committee Recommendation**
   - February 2012 Open House (1)
   - February 22, 2012 Public Comment Meeting

6. **Final Committee Recommendation**
   - Public Hearings

The key analysis at each phase was summarized on display boards and handouts for each open house. The handouts are attached as ***Exhibit 5.4.*** Detailed technical analysis was addressed throughout the phases in memos which are available on the website. The information is summarized in the handouts. The detailed memos are not attached to the staff report or these findings as exhibits, but are available (the technical documents are archived and can be accessed here: https://www.grantspassoregon.gov/Index.aspx?page=1403; the UGB Steering Committee agendas, meeting materials, and meeting minutes are archived here: https://www.grantspassoregon.gov/Index.aspx?page=1161).

Public testimony submitted throughout the process prior to the formal public hearing process in 2012 was indexed in the ***Public Testimony Packet***. Public testimony from property owners pertaining to their property was shown on a map in the Public Testimony Packet following the index, immediately before Section I. Written testimony was provided in ***Public Testimony Packet Exhibits I.1-I.245***. It was entered into the record by staff. Minutes from the Public Comment Meetings were provided in ***Public Testimony Packet Sections II.1-II.5.*** Survey results were summarized in ***Public Testimony Packet Sections III.3-III.6.*** New testimony received during those hearings was compiled separately.
Below is a summary of the material and work conducted at each of the major phases, summarized in the handouts attached as ***Exhibit 5.4.*** Key materials and issues from previous open houses were also summarized and displayed at subsequent open houses, and handouts from earlier phases were available.

1. **Study Areas Overview (June 2010 Open Houses)**
   Ten original study areas encircling the current UGB were evaluated to consider all potential areas and narrow down to those feasible for further consideration. The information was shared and public input was taken at the June 2010 open houses, through a survey, and at the July 2010 public comment meeting.

2. **Preliminary Concepts Overview (June 2010 Open Houses)**
   Five expansion area concepts representing the range of major growth alternatives were developed and evaluated. The information was shared and public input was taken at the June 2010 open houses, through a survey, and at the July 2010 public comment meeting.

3. **Draft Concept Overview (April 2011 Open Houses)**
   Based on the technical analysis and public input on the preliminary concepts, a Public Comment Draft Concept was developed and evaluated. The information was

shared and public input was taken at the April 2011 open houses, through a survey, and at the May and June 2011 public comment meetings.

4. **Draft UGB Concept and Options Being Evaluated (October 2011 Open Houses)**
   Based on the technical analysis and public input on the Draft Concept, potential alternatives and associated trade-offs for some of the expansion areas in the Draft Concept were identified and evaluated. The information was shared and public input was taken at the October 2011 open houses, through a survey, and at the October 2011 public comment meeting.

5. **Preliminary Committee Recommendation ("Refinement Concepts" on cover) (February 2012 Open House)**
   Based on the technical analysis, public input, and trade-offs considered on the Draft Concept and Options Evaluated, revisions were made to the initial Draft Concept. This became the Committee's Preliminary Recommendation. The preliminary recommendation was shared and public input was taken at the February 2012 open house and February 2012 public comment meeting.

6. **Final Committee Recommendation (Council Memo 042) (April 2012)**
   The Committee made its final boundary recommendation at its April 2012 work session. The map of the Committee's final boundary recommendation is attached to the Committee's memo. This is the recommendation that is being reviewed through the public hearing process.

General Information handouts such as Frequently Asked Questions (FAQs) were also developed and available at the open houses, meetings, in the City and County offices, and on a special project website at www.GrantsPassUGB.com. Staff also offered to meet with groups to provide information updates, and met with some groups upon their requests.

Summary of Final Committee Recommendation

The UGB Steering Committee outlined its recommendation and key deliberations in a memo dated April 11, 2012 which was distributed with Council Memo 042 dated April 23, 2012. ***See Exhibit 5.5.*** The maps, minutes, and handouts which were attached to the memo were also available.

During the alternatives analysis, original study areas were referenced by numbers, and subsequent sub-areas were referenced by letter names. Those are shown on the various maps and referenced in various documents. They are generally consistent throughout the phases, with some exceptions. The areas identified in the Committee's recommendation are not all sequential, because they reflect a subset of the original areas that were evaluated, revised, and selected. Some contiguous areas that were previously listed separately have been combined.

Characteristics of Areas

Key characteristics of the areas and surrounding areas were noted in the maps presented in the open house handouts in ***Exhibit 5.4*** and were described in technical memos. Therefore, characteristics of each area were not individually described in the previous staff report, but key issues related to the criteria were noted.

Generalized Land Use Needs

The 'Land Use Summary' Map in Handout 3 'Draft Concept Overview' showed a generalized description of the land uses that would initially be proposed for

allocation to each area in the next phase. ***See Exhibit 5.6.*** These were based on areas having characteristics suitable for the land uses. Work on the land use designations was to continue in the next project phase. It was also anticipated that some of the vacant and partially vacant lands within the existing UGB would be considered for re-designation in consideration of the overall land use needs for the UGB overall.

Zoning

A county zoning map with the zoning outside the UGB was attached as ***Exhibit 5.7.*** It showed the relationship of the zoning to the study areas (the study area names below are those used in the earlier analysis, some may have been further divided or reconfigured after 2012). Other than three tax lots totaling approximately 44 acres in Area H with Farm Resource (FR) zoning (the same as Exclusive Farm (EF) zoning), all other properties have zoning which is classified as 'exception' zones under state law. These are non-resource zones which have rural residential, rural commercial, or rural industrial zoning.

Most of the area perimeters did not abut resource zones. The following were near resource zones:

- Area A has one corner abutting Woodlot Resource (WR). The remainder abuts Rural Residential.
- Part of the south boundary of Area A3/A4 abuts WR. The remainder abuts Rural Residential.
- The east boundary of Area H abuts WR. The remainder abuts Rural Residential, Rural Commercial, and Rural Industrial.
- The west boundary of I/K abuts WR.
- The area across the Rogue River to the north of V/V2 is Rural Residential (approximately 5600 feet of frontage) with some EFU (approximately 1400 feet of frontage)
- Area W2/W3 has one corner abutting EFU. The area to the north across the railroad tracks is WR.
- The east boundary of Area X abuts Forest Commercial (FC).

All other areas are abutting Rural Residential zones, except a small portion of H2 abuts a Rural Commercial zone. Except as noted above, most areas are a significant distance from Farm Resource (FR) or Exclusive Farm (EF) zones.

Deer Winter Range

A map with the Deer Winter Range overlay is attached as ***Exhibit 5.8***. None of the areas is within the Deer Winter Range overlay. Small parts of Areas A and J are near or abutting Deer Winter Range.

Topography

Characteristics of properties and surrounding areas are shown on various maps in the handouts attached as ***Exhibit 5.4.*** Some uses generally require flatter sites, while others have greater flexibility in terms of sloping sites. Most areas do not contain significant areas of slopes over 25%, but some areas are flatter, while others contain greater amounts of moderate slopes. Also, the proposal generally avoids areas immediately downhill from steeper slopes and box canyons that may pose the most significant wildfire and other risks.

Transportation Facilities
Some land uses need, or are better suited to, locations near major transportation facilities, such as I-5, major state highways, or the railroad. Some areas have proximity to these facilities, while others don't.

Other Public Facilities and Infrastructure
Since most areas are outside the current UGB, urban services are not present, with the exception of the northerly portion of the Redwood Sewer District which pre-dated the current UGB, and provides sewer service to some rural-residential properties outside the UGB in the northerly part of V/V2 and continuing a significant distance to the west to the site of the former Redwood treatment plant.

The documents that summarize the analysis provide more detail about efforts to most cost-effectively utilize existing available infrastructure capacity, configure areas to enable methods for cost-effective and beneficial methods for provision of services. Examples include opportunities to design additional capacity for facilities in the current master plans that have not yet been built; gravity sewer where possible rather than areas that require additional pump stations or lift stations; configure areas to obtain economies of scale for provision of water service meeting fire-flow and pressure requirements, based on considerations of serving areas with water storage facilities or pump stations.

Some issues can't be reconciled by mapping revisions. For example, the UGB can't always follow property lines and water service contour lines in all cases; therefore, some issues may need to be addressed through development standards and public service policies.

Minor Map Corrections/Modifications

- For consistency with the Steering Committee recommendation and to consider a property configuration where some properties crossed water pressure zones, some minor map revisions were noted in the Recommendation section of the previous staff report. ***See Exhibit 5.10.*** Some of those remained in the recommendations for the second work phase.

2013 to Present:

The Oregon Office of Economic Analysis (OEA) issued their latest draft long-range forecast for Oregon and its counties in January 2013, and their final forecast in March 2013. Staff consulted with DLCD and held workshops with the City Council and Board of County Commissioners to discuss issues and alternatives for moving forward with the work.

Through a series of work sessions, meetings, and adoption of resolutions and motions, the City Council and Board of Commissioners provided direction that led up to concurrent resolutions for their draft proposal. The process is summarized in the draft update to the Urbanization Element (Addendum 2). In addition, the ***UGB 'Latest News'*** page on the City website at http://www.grantspassoregon.gov/Index.aspx?page=674 includes a chronological list of news updates with links to the materials considered and adopted at various work sessions and meetings. ***See Exhibit 3.*** The City Council and Board of Commissioners adopted concurrent resolutions providing direction on foundational steps of the work that allowed the next steps to move forward with their concurrence. Once there was concurrence on all of the draft proposals, the final

documents were prepared, and the application was submitted and transmitted to DCLD with the 'Form 1: Notice of Proposed Amendment' to begin the local public hearing process.

Based on the updated population forecast, all of the associated "needs" elements of the Comprehensive Plan were updated accordingly based on the new forecasts, and updated to the new planning periods (2013-2033 for the UGB and 2033-2043 for the Urban Reserve). These were incorporated into the Urbanization Element, and the Buildable Lands Inventory was updated.

Section 4 of the Urbanization Element Update (Addendum 2) summarizes the analysis of study areas, with the suitability analysis and alternatives analysis. The size of the 2013-2033 UGB together with the 2033-2043 Urban Reserve areas based on the new forecast is smaller than the previously proposed UGB based on the previously adopted forecast. Therefore, the previous suitability analysis and alternatives analysis within the original study areas was still applicable. Some areas that were previously excluded from consideration due to serviceability issues were reconsidered for employment lands, and additional analysis was conducted. Figure 4-2 of the Urbanization Element update shows the outer extent of the study areas that went through further analysis and consideration. Figures 4-3, 4-4, and 4-5 of the Urbanization Element summarize the suitability and alternatives considerations. Throughout the process, the City Council and Board of Commissioners considered the issues together with information and testimony that had been provided during the hearings in 2012 and during hearings held when they adopted their resolutions providing direction on the draft work products.

VII. CONFORMANCE WITH APPLICABLE CRITERIA:

Comprehensive Plan Amendments (Criteria: Comprehensive Plan Section 13.5.4). Population Element 6 Update Addendum 1; Housing Element 9 Update Addendum 1; Economic Element 8 Update Addendum 1; Urbanization Element 14 Addendum 2; Element 13 Policies UGB and Urban Reserve Criteria and Procedures; Internal Consistency with Efficiency Measures; Comprehensive Plan Map Amendments: lands inside UGB, UGB expansion areas, and Urban Reserve allocations and concepts.

CRITERION (a): Consistency with other findings, goals and policies in the Comprehensive Plan.

FINDING: Satisfied. The updates to the Population, Housing, Economic, and Urbanization Elements update the database elements of the Comprehensive Plan to reflect more current information consistent with the updated County coordinated population forecast, and they are internally consistent. These are also updated consistent with the new 2013-2033 UGB and 2033-2043 Urban Reserve planning periods. The Economic Element update also provides updated policy for the Economic Opportunities Strategy. The Urbanization Element update outlines the needs, efficiency measures, and polices, and provides the necessary resulting boundary amendments, map amendments, plans, and procedures. The amendments provide updates needed for consistency, and they are also consistent with other findings goals, and policies.

CRITERION (b): A change in circumstances, validated by and supported by the data base or proposed changes to the data base, which would necessitate a change in findings, goals and policies.

FINDING: Satisfied. Several of the plan amendments are necessary for consistency with the updated Josephine County coordinated population forecast, based on the forecast for Oregon and its counties issued by the Oregon Office of Economic Analysis (OEA) in March 2013. Other plan amendments are necessary to provide policies, planning outcomes consistent with the updated needs and to implement associated policies.

CRITERION (c): Applicable planning goals and guidelines of the State of Oregon.

FINDING: Satisfied, with Additional Findings Regarding the Short-Term Supply of Employment Lands. The original Population, Housing, Economic, and Urbanization Element updates were previously adopted consistent with the applicable planning goals and guidelines, and they were acknowledged. They have been updated to reflect the new population forecast, planning periods for UGB and Urban Reserve, and policies, consistent with applicable planning goals and guidelines.

While the Economic Element was previously adopted and acknowledged, in an October 7, 2014 letter, DLCD has interpreted the provisions of 660-009-0020(2) to apply to the Economic Element Addendum 1 update since Grants Pass is now within an MPO. The provisions of 660-009-0020(2) will be satisfied subject to additional findings regarding the short-term supply of employment lands as part of the City Council's findings.

CRITERION (d): Citizen review and comment.

FINDING: Satisfied. After an extensive public process prior to hearings in 2012, testimony was also received during public hearings in 2012. See also findings under Criterion 13.6.3(a), Statewide Planning Goal 1, for a more detailed description of the public processes that occurred prior to 2013. That input and testimony also helped inform the work that occurred beginning in 2013. Notice of the March 20, 2013 and May 13, 2013 Council actions was provided to an interested parties notification list. News updates about the meetings and work were continually posted on the City web page and UGB 'Latest News' webpage with copies of draft work products, resolutions, and motions throughout the work in 2013 and 2014. ***See Exhibit 3.*** Notices of informational houses and public hearings were provided to subject properties, tenants of manufactured home parks, properties within a 250' notification area, and an interested parties notification list. Informational open houses provided an additional opportunity for information and to answer questions before the public hearings.

CRITERION (e): Review and comment from affected governmental units and other agencies.

FINDING: Satisfied. The work has been coordinated between the City of Grants Pass and Josephine County. Aspects of the work conducted prior to 2013 which are relevant to the current application were reviewed and commented on by various

stakeholders including affected departments, governmental units, and other agencies. The City and County have coordinated with DLCD throughout the process as work progressed. Information has been provided to ODOT for review and comment. Notice of the proposal was also provided to the agencies and departments on the city's 'site plan review committee' list for opportunity for comments.

CRITERION (f): A demonstration that any additional need for basic urban services (water, sewer streets, storm drainage, parks, and fire and police protection) is adequately covered by adopted utility plans and service policies, or a proposal for the requisite changes to said utility plans and service policies as a part of the requested Comprehensive Plan amendment.

FINDING: Satisfied. The text amendments provide the basis for the land use planning, and the proposed map amendments were based on consideration of provision of public facilities and services during the alternatives analysis. Consistent with applicable state law, the plan designations for the expansion areas are adopted prior to rezoning of lands from rural to urban designations. This provides the basis for the modeling and updates to the transportation and infrastructure plans that will be undertaken upon adoption of these amendments and before most or all urban zoning would be applied in UGB expansion areas.

CRITERION (g): Additional information as required by the review body.

FINDING: Satisfied Contingent on Review Body Direction. Additional information can be provided if requested.

CRITERION (h): In lieu of item (b) above, demonstration that the Plan as originally adopted was in error.

FINDING: Not Applicable.

Development Code Text Amendments (Criteria: Development Code Section 4.103).

CRITERION 1: The proposed amendment is consistent with the purpose of the subject section and article.

FINDING: Satisfied. The proposal includes amendments to Sections 4, 12, 14, 18, 19, 22, 25, and 30. (Development Code Amendments and Criteria, Zoning Districts, Certain Uses, Planned Unit Developments (PUDs), Site Plan Review, Residential Development Standards, Parking and Loading Standards, and Definitions). The proposed amendments implement efficiency measures policies adopted in the Urbanization Element. The proposals are consistent with the purposes of the subject articles and sections. As needed, additional language in the purpose statements and related provisions have been provided to reflect the purpose and intent of new policies and provisions being implemented.

CRITERION 2: The proposed amendment is consistent with other provisions of this code.

FINDING: Satisfied. Proposed amendments have been written to provide internal consistency with existing provisions and with one another. Some code provisions have been reorganized and rewritten accordingly.

CRITERION 3: The proposed amendment is consistent with the goals and policies of the Comprehensive Plan, and most effectively carries out those goals and policies of all alternatives considered.

FINDING: Satisfied. The proposed amendments implement policies and efficiency measures in the adopted and updated Urbanization Element. The policies themselves provide for a variety of methods to achieve efficiencies through numerous approaches. The implementation of the policies is written to provide for flexibility in applying the measures to achieve efficiencies without major across-the-board changes that could otherwise have greater implications for more properties.

CRITERION 4: The proposed amendment is consistent with the functions, capacities, and performance standards of transportation facilities identified in the Master Transportation Plan.

FINDING: Satisfied. Amendments have been implemented in a manner that is consistent with the Master Transportation Plan. In some cases, provisions are implemented through a phased approach that addresses interim development while the transportation plan is updated to model and address the effects of future land use.

Zoning Map Amendments within Current UGB (Criteria: Development Code Section 4.033).

CRITERION 1: The proposed use, if any, is consistent with the proposed zoning district.

FINDING: Satisfied/Not Applicable. No specific use and development is proposed at this time in conjunction with the proposal for map amendments. (The text amendments above provide for revisions to the list of uses for some zoning districts, and those uses are consistent with the proposed zoning districts).

CRITERION 2. The proposed Zoning District is consistent with the Comprehensive Plan Land Use Map designation.

FINDING: Satisfied. The proposed zoning amendments are consistent with existing Comprehensive Plan land use map designations, or the proposal includes concurrent Comprehensive Plan map amendments, and the proposed zoning is consistent with the proposed Comprehensive Plan map amendments.

CRITERION 3: A demonstration that existing or proposed levels of basic urban services can accommodate the proposed or potential development without adverse impact upon the affected service area or without a change to adopted utility plans.

FINDING: Satisfied. The proposed amendments include a two-phase approach that provides for continued use under current zoning, with additional use and

intensity subject to additional analysis if more intensive use is proposed in accordance with the new overlay zoning while the master plans are updated. The final zoning amendment will be effective upon adoption of the updated transportation plan, allowing the future land use to be modeled and planned for.

CRITERION 4: A demonstration that the proposed amendment is consistent with the functions, capacities, and performance standards of transportation facilities identified in the Master Transportation Plan.

FINDING: Satisfied. The proposed amendments include a two-phase approach that provides for continued use under current zoning, with additional use and intensity subject to additional analysis if more intensive use is proposed in accordance with the new overlay zoning while the master plans are updated. The final zoning amendment will be effective upon adoption of the updated transportation plan, allowing the future land use to be modeled and planned for.

CRITERION 5: The natural features of the site are conducive to the proposed Zoning District.

FINDING: Satisfied. Most properties are relatively flat with gentle slope. Some properties contain areas with wetlands. Some properties include a portion of moderate or steep slopes. The natural features of the sites are conducive to the proposed zoning. Further, some of the proposed text amendments provide greater flexibility for site development and preservation of natural features.

CRITERION 6: The proposed zone is consistent with the requirements of all overlay districts that include the subject property.

FINDING: Satisfied. The properties are not located within the floodway, historic district, or medical overlay zones. Portions of some properties are within moderate/steep slope areas and portions of some properties are within 100-year flood plain (not floodway). The properties can be developed in accordance with the standards of the overlay districts.

CRITERION 7: The timing of the zone change request is appropriate in terms of the efficient provision or upgrading of basic urban services versus the utilization of other buildable lands in similar zoning districts already provided with basic urban services.

FINDING: Satisfied. These are not changes from rural to urban zoning, but rather, changes from one urban zoning district to another, which are served or can be served with urban services. The timing allows for the public facilities plans updates to model and address, as needed, future land use based on the zone changes. The changes have the effect of providing for efficient utilization of buildable lands within the UGB that reduces the extent for greater UGB expansion that would require further urban service extensions. Other lands in similar zoning districts can also be utilized with efficient provision of urban services.

CRITERION 8: In the case of rezoning from the Urban Reserve District, that the criteria for conversion are met, as provided in Section 4.034.

FINDING: Not Applicable. There is no rezoning from the Urban Reserve District. *(Note: The Urban Reserve District is an unused zoning district that is different than the Urban Reserves submitted as this bundle of amendments. There is also an active application for an amendment repealing the Urban Reserve District and this criterion, but this criterion was still in effect at the time of application).*

UGB Amendment (Criteria: Comprehensive Plan Section 13.6.3 Criteria for Inclusion, Statewide Planning Goal 14, ORS 197.728, OAR 660 Division 24).
NOTE: Section 13.6.4. 'Criteria for Exclusion' applies to exclusion of property previously included in the boundary (removal) and is not applicable.

The proposed UGB amendment is a new application, and it was developed based on the new forecast and the resulting addenda to the Comprehensive Plan Elements that began in 2013. However, much of the alternatives analysis conducted prior to 2012 is still applicable and is therefore summarized below. Section 4 of the Urbanization Element provides the updated supporting information and findings for the updates and alternatives analysis conducted from 2013 to present.

Comprehensive Plan Section 13.6.3. Criteria for Inclusion

CRITERION (a): The proposed inclusion meets applicable goals and guidelines of the State of Oregon

Applicable state goals, statutes and administrative rules for the Urban Growth Boundary (UGB) amendment include:

- Goal 1: Citizen Involvement
- Goal 2: Land Use Planning
- Goal 14: Urbanization
    - ORS 197.298: Priority of land to be included within urban growth boundary
    - OAR 660-024: Urban Growth Boundaries

The remainder of this section presents findings for each goal and related statute or administrative rule.

Goal 1: Citizen Involvement.

The intent of Goal 1 is to ensure that citizens have meaningful opportunities to participate in land use planning decisions. As stated in the Goal, the purpose is:

> *To develop a citizen involvement program that insures the opportunity for citizens to be involved in all phases of the planning process.*

Goal 1 has five stated objectives that are relevant to the UGB boundary amendment:

1. *Citizen Involvement -- To provide for widespread citizen involvement.*
2. *Communication -- To assure effective two-way communication with citizens.*

3. *Citizen Influence -- To provide the opportunity for citizens to be involved in all phases of the planning process.*
4. *Technical Information -- To assure that technical information is available in an understandable form.*
5. *Feedback Mechanisms – To assure that citizens will receive a response from policy-makers.*

Finding: Satisfied. The City Council appointed a Steering Committee made up of diverse community representatives to review materials and make recommendations to the Urban Area Planning Commission and Grants Pass City Council. The committee also included liaisons from the Urban Area Planning Commission, Rural Planning Commission, City Council, and Board of County Commissioners. The committee also made recommendations and assisted with items that were the subject of further public involvement, and it reviewed citizen input in making recommendations on draft products that were considered by the Urban Area Planning Commission and City Council, and where applicable by the Rural Planning Commission and Board of County Commissioners. In addition, all Steering Committee meetings were open public meetings (not public hearings) that were noticed on the City's web site and other locations. The agendas for their meetings included a time for input from the public and an opportunity to submit comments to the committee. Citizens and interested parties frequently attended these meetings.

The Steering Committee recommended adoption of a proposed Boundary Amendment on April 11, 2012 which was the culmination of the Committee's efforts in this action.

The documents that outlined the need for the Boundary Amendment recommended in 2012 were developed and adopted between May 2007 and January 2009. This included updates to the Population, Housing, Economic, and Urbanization chapters of the Grants Pass Comprehensive Plan. Need for land to accommodate population and employment growth was discussed and revised through the course of numerous Steering Committee meetings. The Stakeholder Committee met approximately 12 times between May 2007 and January 2009 during this phase.

Various aspects of the work then compiled into the Boundary Amendment were considered over the course of approximately 8 meetings from February 2009 through April 2012. The Boundary Amendment, as proposed, was developed with public input received through several public open houses, surveys, and public comment meetings as summarized below:

1. **Define UGB Study Areas &**
2. **Draft Preliminary UGB Concepts**
   - June 2010 Open Houses (2)
   - Survey
   - July 14, 2010 Public Comment Meeting
3. **Draft UGB Concept (Public Comment Draft)**
   - April 2011 Open Houses (2)
   - Survey
   - May 25 and June 22, 2011 Public Comment Meetings

4. **Draft UGB Concept and Options Being Evaluated**
   - October 2011 Open Houses (2)
   - Survey
   - October 26, 2011 Public Comment Meeting
5. **Preliminary Committee Recommendation**
   - February 2012 Open House (1)
   - February 22, 2012 Public Comment Meeting
6. **Final Committee Recommendation**
   - Public Hearings

Documents recommended by the Committee were available and posted on the City's website (http://www.grantspassugb.com). The proposed Boundary Amendment recommended by the Steering Committee was available on the City web site, and was available since shortly after the Steering Committee recommendation on April 11, 2012. (http://www.grantspassugb.com/documents/UGB_Committee_Final_Recommendation_Memo_04-11-12.pdf)

The City also maintained a list of parties who expressed interest in the UGB evaluation process, and direct notice of the 2012 public hearings was provided to the interested parties. The City also maintains a website pertaining to the UGB evaluation process with information, draft documents, and minutes of the Steering Committee meetings. Interested parties were notified of the information available on the website.

The 2012 public hearings provided opportunity for public involvement on the Committee's final recommendation. After public hearings in 2012, the proposed amendment was not adopted.

Work resumed in 2013 following notification that the Oregon Office of Economic Analysis (OEA) issued their latest draft long-range forecast for Oregon and its counties in January 2013. They adopted their final state and county-level forecasts in March 2013. Staff consulted with DLCD and held workshops with the City Council and Board of County Commissioners to discuss issues and alternatives for moving forward with the work.

After the extensive public process prior to hearings in 2012, testimony was also received during the public hearings in 2012. The public input and testimony received prior to 2013 helped inform the work that occurred beginning in 2013. Through a series of work sessions, meetings, and adoption of resolutions and motions, the City Council and Board of Commissioners provided direction that led up to concurrent resolutions for their draft proposal. The City Council and Board of Commissioners adopted concurrent resolutions providing direction on foundational steps of the work that allowed the next steps to move forward with their concurrence. Once there was concurrence on all of the draft proposals, the final documents were prepared, and the application was submitted and transmitted to DCLD with the 'Notice of Proposed Amendment' to begin the local public hearing process.

Notice of the March 20, 2013 and May 13, 2013 Council actions was provided to an interested parties notification list. The process is summarized in the draft

update to the Urbanization Element (Addendum 2). In addition, the ***UGB 'Latest News'*** page at http://www.grantspassoregon.gov/Index.aspx?page=674 on the City website includes a chronological list of news updates with links to the materials considered and adopted at various work sessions and meetings. ***See Exhibit 3.*** News updates about the meetings and work were continually posted with copies of draft work products, resolutions, and motions throughout the work in 2013 and 2014. Notices of the informational houses and public hearings were provided to subject properties, tenants of manufactured home parks, properties within a 250' notification area, and an interested parties notification list. Informational open houses provide an additional opportunity for information and to answer questions before the public hearings.

The process provided opportunity for citizen review and comment and is compliant with Statewide Planning Goal 1.

Goal 2: Land Use.

Goal 2 requires all incorporated cities to establish and maintain comprehensive land use plans and implementing ordinances. It also requires cities to coordinate with other affected government entities in legislative land use processes. The purpose of Goal 2 is:

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

Grants Pass has an established land use process and policy framework. The applicable sections of that framework are addressed in this findings document. The Goal also requires that local comprehensive plans:

> *"...shall be reviewed and, as needed, revised on a periodic cycle to take into account changing public policies and circumstances..."*

Finally, Goal 2 establishes a process for Goal exceptions. With respect to UGB boundary amendments, the exceptions process is more clearly articulated in OAR 660-024-0020 (1):

> *(1) All statewide goals and related administrative rules are applicable when establishing or amending a UGB, except as follows:*
>
> > *(a) The exceptions process in Goal 2 and OAR chapter 660, division 4, is not applicable unless a local government chooses to take an exception to a particular goal requirement, for example, as provided in OAR 660-004-0010(1);*
> >
> > *(b) Goals 3 and 4 are not applicable;*
> >
> > *(c) Goal 5 and related rules under OAR chapter 660, division 23, apply only in areas added to the UGB, except as required under OAR 660-023-0070 and 660-023-0250;*

(d) The transportation planning rule requirements under OAR 660-012-0060 need not be applied to a UGB amendment if the land added to the UGB is zoned as urbanizable land, either by retaining the zoning that was assigned prior to inclusion in the boundary or by assigning interim zoning that does not allow development that would generate more vehicle trips than development allowed by the zoning assigned prior to inclusion in the boundary;

Finding: Satisfied. The City has followed the City-established land use planning procedures throughout the UGB review process.

With respect to agency consultation, prior to 2013, the City and County coordinated with DLCD throughout the process, and provided notice on May 18, 2012 in advance of the June 11, 2012 Planning Commission hearing to DLCD. Public notice is provided for the public hearings in accordance with the applicable procedures through mailed, newspaper, and other posted notice. The City also maintained a list of parties who expressed interest in the UGB evaluation process, and direct notice of the 2012 public hearings was provided to the interested parties. The City also maintains a website pertaining to the UGB evaluation process with information, draft documents, and minutes of the Steering Committee meetings. Interested parties were also been notified of the information available on the website.

For the work that began in 2013, the City and County also coordinated with affected agencies throughout the process. For the hearings in 2014 on the work that began in 2013, the City followed the applicable procedures, providing notice to DLCD, affected agencies, subject properties, tenants within manufactured housing parks, surrounding properties within 250 feet of subject properties, and the interested parties notification list.

The process and information in the technical documents and these findings is compliant with OAR 660-024-0020(1).

Goal 14: Urbanization.

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.

The remainder of the Goal 14 findings are broken out by specific criteria. Goal 14 provides two 'Need Factors' and four 'Location Factors'. Goal 14 and the related statutes and rules establish a specific method and hierarchy for boundary review. The findings that follow are organized according to that hierarchy and include the following sections:

A. **Goal 14 Need Criteria**. The first step in addressing the Goal 14 criteria for a boundary amendment is to establish the need for the boundary amendment. That need must comply with Goal 14 Need Factors 1 and 2, as well as additional rules related to housing and employment. The need for land to accommodate 20 years of growth is established in the Population, Housing, Economic, and Urbanization chapters of the Grants Pass Comprehensive Plan. The 2014 UGB amendment is based on 2014 updates to all of these elements submitted concurrently. The Urbanization Chapter summarizes the relevant need data and is the primary document referenced in the findings under this section.

B. **ORS 197.298 Requirements**. ORS 197.298 establishes a statutory priority scheme for inclusion of lands in the UGB. This scheme must be strictly adhered to. This section evaluates the lands in the proposed expansion areas against the ORS 197.298 priorities.

C. **660-024-0060 Boundary Location Alternatives Analysis**. The boundary location alternatives analysis is conducted in concert with the ORS 197.298 priorities. The alternatives analysis is presented as the third set of findings because most of the land reviewed for inclusion was of the same priority—thus providing the city with viable expansion alternatives. Prior to 2013, the City and County prepared and reviewed five different growth concepts (or alternatives) in a comprehensive technical process with several rounds of citizen involvement. That analysis was used, updated, and refined for the work that began in 2013.

D. **Goal 14 Boundary Location Factors**. Once the City and County identify alternatives, Goal 14 then requires application and review of four boundary location factors. These factors must be analyzed as part of the overall boundary review and provide justification for the preferred alternative.

A. Goal 14 Need Criteria

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

Goal 14 Need 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 Need Factor 1 Finding: Satisfied**. 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 Josephine County coordinated population forecast. Moreover, the City and County must show a relationship between projected population growth and projected employment growth as it relates to employment land need. OAR 660-024-0040 (8) (a) (ii) allows the City to

determine employment land needs using a 'safe harbor' based on "The population growth rate for the urban area in the adopted 20-year coordinated population forecast..." This 'safe harbor' was used for the employment forecast; therefore, the population and employment forecasts have a firmly established relationship.

Concurrent with this UGB amendment application are 2014 updates to the Josephine County coordinated population forecast for Josephine County and its cities. Also concurrent with this UGB amendment application is a 2014 update to the Population Element of the Grants Pass Urbanizing Area Comprehensive Plan for the Grants Pass urban area, consistent with the County coordinated forecast. Residential land need for Grants Pass is based on Josephine County's adopted and coordinated population forecast for Grants Pass. There is a direct relationship between the employment forecast in the Grants Pass Economic Opportunities Analysis (EOA) and Josephine County's adopted and coordinated population forecast for Grants Pass.

The Urbanization Element and the 2014 Urbanization Element Update (Addendum 2), submitted concurrent with this 2014 UGB amendment application, provide detailed technical analysis of land supply and need for Grants Pass for the UGB (2013-2033) and Urban Reserve (2033-2043) planning periods. The Urbanization Element with the previous 2012 update and the 2014 updates provides the foundation for land need and is compliant with Goal 14 Need Factor 1.

Goal 14 Need Factor 2: Demonstrated need for housing, employment opportunities, livability or uses such as public facilities, streets and roads, schools, parks or open space;

Goal 14 Need Factor Finding: Satisfied. The 2014 population forecast update provides the basis for the 2014 updates of the Housing and Economic Elements of the Grants Pass Comprehensive Plan. Those documents detail the land needed to accommodate future population growth consistent with applicable statewide planning requirements.

The details of land need are described in the Urbanization Element and the 2014 update. Specifically, Section 3 of the update (Addendum 2) describes land needs, comparison of land supply and demand, and consideration of land use efficiency measures. The findings of the Comprehensive Plan Elements and updates are hereby incorporated into these findings by reference.

In summary, the City and County have demonstrated need for additional land in accordance with the Goal 14 Need Factors 1 and 2 based on population and employment figures and land analysis provided in the adopted Comprehensive Plan Elements and 2014 updates.

B. ORS 197.298 Requirements

The 2014 Urbanization Element update documented a deficit of land within the UGB after consideration of land use efficiency measures providing the basis for a UGB boundary amendment. 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:

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

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.

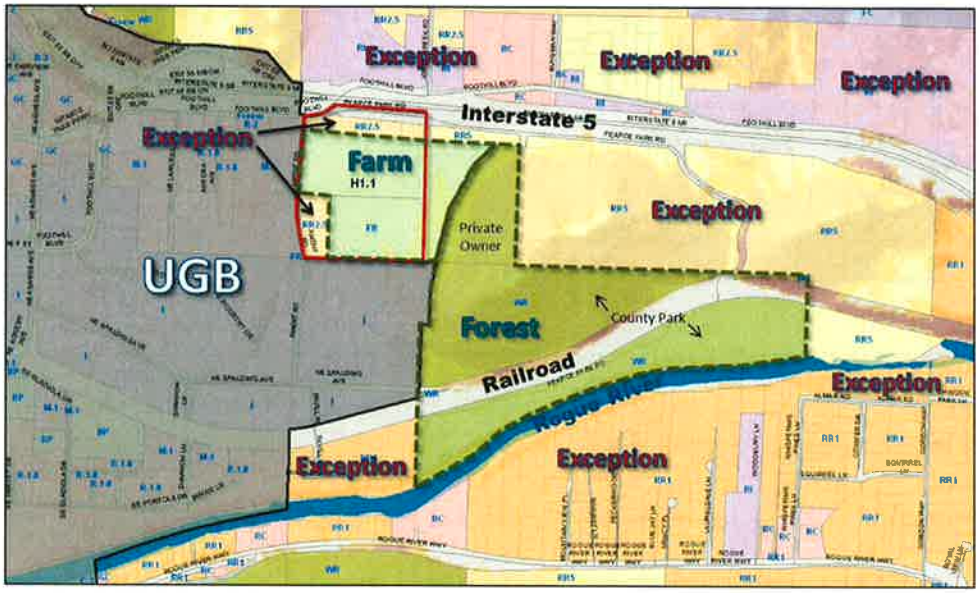
ORS 197.298 Finding: Satisfied. With respect to the ORS 197.298 priority scheme:

1. Grants Pass has not previously established urban reserve areas and therefore has no Priority 1 land to review.
2. All lands proposed for inclusion in the UGB are Priority 2 exception areas/non-resource lands.
3. Area H1.1 was previously considered for inclusion in the UGB prior to 2013, but was proposed for inclusion in the Urban Reserve in the current application. However, the Planning Commission recommended that it not be included in the Urban Reserve. Therefore, they made no findings regarding inclusion of Priority 3 or Priority 4 lands. The following information is retained for reference.

   The only land with resource zoning previously proposed for inclusion in the UGB was approximately 43 acres in Study Area H1.1 (and the contiguous property immediately to the east, previously included in Area H). With that excluded from the proposed UGB, ***all*** land in the remaining proposed UGB amendment area is priority 2 land, with all acres in established exceptions areas. All of the land proposed for inclusion is adjacent to the existing UGB. None of the priority 2 land requires a determination based on the priority 2 language "*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.*"

NOTE: The zoning map below also shows that the farm resource land in H1.1 (and the contiguous property immediately to the east, previously included in Area H) is the only farm resource land in the area. Other than the county park and a private ownership adjacent to that with forest resource zoning, those resource lands are entirely surrounded by the current UGB and exception lands.

Note: Josephine County retains the Farm Resource (FR) zoning designation on the zoning map, but it is subject to the same regulations as EFU.



Zoning in Vicinity of Area H1.1
(Area H1.1 Shown in Red Outline)

Area H1.1 is not proposed for inclusion in the UGB, but the following information is retained for reference:

The Economic Element and Urbanization Element identify a deficit of industrial sites. The Economic Element summarizes specific characteristics of needed sites in Grants Pass. Key criteria include direct access to Interstate 5, availability of urban services, consolidated ownership, and topography. While the site is not flat, the site's topography is considered suitable for industrial uses. Based on the site characteristics summarized in the Economic Element, the City concludes it has a deficit of suitable sites within the current UGB.

Some exceptions lands evaluated for potential inclusion for industrial purposes did not meet the size or location criteria, and others included did not contain enough area to fully meet the identified needs. Certain existing rural commercial and rural industrial lands are already in use as described in the Economic and Urbanization Elements. Other resource lands did not meet the size or location criteria.

The resource lands in UGB study area H1.1 would be allowable under ORS 197.298 (3)(a) and (3)(b) as authorized by OAR 660-024-0060(5).

Exceptions areas are second priority in the ORS 197.298 priority scheme (Grants Pass did not previously establish urban reserves). Based on the siting criteria for industrial 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.*

The following analysis addresses the requirements of section (6). The City conducted a comprehensive review of lands surrounding the existing UGB (see findings in the next section "C. 660-0024-0060 Boundary Location Alternatives Analysis").

The Economic Element of the Grants Pass comprehensive plan indicates the need for some larger industrial sites. Moreover the sites need to have direct proximity to Interstate 5. Grants Pass has two interchanges on Interstate 5. Findings about study area A (the Northern I-5 interchange) include:

- Area A is suitable for employment use, and is an employment site in the proposed UGB
- The area has about 109 buildable acres in 52 tax lots.
- The area has 42 existing dwelling units.
- The area has no individual parcels larger than 10 acres
- Aggregation of parcels would be difficult given existing ownership and development patterns.

Other sites along I-5 north and west of Area A are also employment sites in the proposed UGB. Thus, the City finds that the lots in Study Area H are the only remaining alternative that could adequately meets the need for larger sites over 20 acres with the needed site characteristics. Even if the need could be met with smaller industrial sites, no comparable suitable sites with the access characteristics that have suitable topography are available. However, updated provisions of the City's updated Economic Opportunities Strategy in Addendum 1 of the Economic Element provide for inclusion of less than the maximum need identified and justifiable for employment lands.

C. 660-024-0060 Boundary Location Alternatives Analysis

Prior to 2013, the City initiated a comprehensive process to review boundary location alternatives and determine a preferred alternative. This process was conducted with input from

the steering committee, residents of Grants Pass and the affected areas, affected agencies, the general public, and local elected officials as described under the findings for Statewide Planning Goal 1. The process since the beginning of 2013 is also described in those findings.

OAR 660-024-0060 describes the requirements for conducting a 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.*
>
> **Finding for OAR 660-024-0060 Boundary Location Alternatives Analysis: Satisfied**. ***Exhibits 5.2, 5.4, and 5.5 of the original record and the 2014 Urbanization Element Update Addendum 2*** describe the process the City and County used to evaluate lands for inclusion in the UGB. The materials in the original record were used in the public workshops hosted by the City as part of the public involvement process prior to 2013. The Alternatives Analysis process had several steps that are summarized here:
>
> - The Study Areas Rounds began with a broad overview approach that included all lands encircling the current UGB to be sure all possible areas were considered. 10 separate areas were identified to make it easy to talk about and further consider the pros and cons within each area.
> - The initial filter removed about 4,000 of the 19,000 acres reviewed, but was still more than 10 times the expansion need.
> - The results of the second filter reduced the amount of land under consideration to about 5,700 acres. At this point the 10 study areas were subdivided into 26 smaller study areas.
> - The third filter removed nine subareas. About 835 additional acres in tax lots removed in third round. Basic serviceability criteria were considered

in this step – including the wastewater collection system and water service elevations.

- Staff, with input from the Steering Committee, developed five UGB expansion alternatives (see ***Exhibit 5.4-2***) that approximately met land needs. These alternatives presented fundamentally different approaches to the geographic location of land needs. To the extent possible, these alternatives attempted to make efficient use of existing urban services.
- The City conducted a planning level analysis of the provision of water, wastewater, transportation, and public safety for each of the five UGB expansion alternatives (see ***Exhibit 5.4-2***). School services were also discussed with school district representatives on the Steering Committee. The result of the planning level service analysis found that:
    - Urban level services could be provided to all of the areas under study—but some areas could be more efficiently serviced than others.
    - No single alternative proved best when all service factors were considered. In short, some alternatives performed best under a single service (wastewater for example), but not as well under other services (See Figure 1).

Figure 1.

	Serviceability Rating for Concept (by Service)				
Service / Facility	Concept 1	Concept 2	Concept 3	Concept 4	Concept 5
Transportation	●●	●	●●	●	●○
Sewer	●●●	●●	●	●●●	●●
Water	●●	●●●	●	●	●●●
Stormwater	●●	●●●	●●	●●	●
Public Safety	●●●	●●●	●	●●●	●

3 Dots (●●●) = Best Rating 1 Dot (●) = Lowest Rating ○ = Half Dot

- The City then conducted open house sessions with the community to get input on the study areas analysis and the five alternatives.
- Based on the preliminary analysis, and public input, the dispersed concepts appeared to be the most feasible and most preferred concepts (Concepts 1 and 4).
- The UGB Steering Committee recommended development of a Public Comment Draft UGB Concept based on the dispersed concepts, similar to Concept 1.
- The Public Comment Draft UGB Concept included the following elements (see ***Exhibit 5.4-3***):
    - Further boundary refinement
    - Further evaluation of difficult locations that may meet certain scarce site needs
    - Further evaluation of some sites that may have individual public facility issues, but that may rate well when all public facility issues are considered together
    - Further service analysis

- Public input was sought on the Public Comment Draft at another round of open houses and a survey.
- The refined UGB Concept was further analyzed, with some potential boundary alternatives in certain expansion study areas (see ***Exhibit 5.4-4***). Additional technical analysis was performed for some serviceability issues in this and subsequent phases. This analysis compared other community issues and trade-offs with serviceability and cost of service issues to help evaluate choices regarding the original Public Comment Draft Boundary, and possible revisions to a boundary that could include the alternative areas.
- The information was shared, and public input was solicited on the Public Comment Draft UGB Concept and the possible option areas, and their associated trade-offs, through another round of public open houses, a survey, and public comment meeting.
- The Steering Committee then evaluated a range of refinement options to develop a preliminary recommendation (***See Exhibit 5.4-5***), which was presented to the community for input.
- The Steering Committee made a final recommendation on April 9, 2012 to move the preferred concept forward into the local review and adoption process (***See Exhibit 5.4-6***).

The 2014 Urbanization Element Update Addendum 2 outlines the process beginning in 2013 and is hereby incorporated by reference.

As noted in the findings for ORS 197.298, the City has no Priority 1 land, and all of the land proposed for inclusion in the UGB is Priority 2 exceptions/non-resource land. As a final step, the City must evaluate all of these Priority 2 lands against the Goal 14 factors—which are addressed in the next section.

D. Goal 14 Boundary Location Factors (factors 1-4)

Goal 14 establishes four boundary location factors that must be considered when reviewing alternative boundaries:

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 UGB.

Goal 14 Location Factor 1: Efficient accommodation of identified land need

Goal 14 Location Factor 1 Finding: Satisfied. The Alternatives Analysis process as described in Section C (C. 660-024-0060 Boundary Location Alternatives Analysis) above, included a comprehensive process to review lands adjacent to the UGB. Goal 14 Location Factor 1—efficient accommodation of

identified land need—was a key consideration in that process. Efficiencies are also described in the adopted Urbanization Element, Section 14-60, Appendix A, and subject to the 2014 Addendum 2 update.

Goal 14 Location Factor 2: Orderly and economic provision of public facilities and services

Additional guidance is provided in OAR 660-024-0060 with a specific focus on provision of urban services:

> *(8) The Goal 14 boundary location determination requires evaluation and comparison of the relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services needed to urbanize alternative boundary locations. This evaluation and comparison must be conducted in coordination with service providers, including the Oregon Department of Transportation with regard to impacts on the state transportation system. "Coordination" includes timely notice to service providers and the consideration of evaluation methodologies recommended by service providers. The evaluation and comparison must include:*
>
> > *(a) The impacts to existing water, sanitary sewer, storm water and transportation facilities that serve nearby areas already inside the UGB;*
> > *(b) The capacity of existing public facilities and services to serve areas already inside the UGB as well as areas proposed for addition to the UGB; and*
> > *(c) The need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements on existing roadways and, for urban areas of 25,000 or more, the provision of public transit service.*

Goal 14 Location Factor 2 & OAR 660-024-0060(8) Finding: Satisfied. The Alternatives Analysis process, as described in Section C (C.660-024-0060 Boundary Location Alternatives Analysis) above, included a comprehensive process to review lands adjacent to the UGB. Goal 14 Location Factor 2—orderly and economic provision of public facilities and services—was a key consideration in that process.

The evaluation and comparison was conducted in coordination with service provides, including ODOT.

- The City is the provider of most urban services, and the review included affected departments and engineering consultants, Josephine County, and consultation at key points with other service providers such as Josephine Community Transit. The City operates the former Redwood Sanitary Sewer Service District (RSSSD).

- The City worked with ODOT staff in the preliminary evaluation of transportation impacts. ODOT staff also attended UGB Committee work sessions, public meetings, and open houses throughout the process, and provided feedback to the City. ODOT provided written comments at earlier stages of the review process, and provided a letter for the 2012 proposal, attached as ***Exhibit 5.11***. The City elected to defer meeting the Goal 12 requirements as allowed by OAR 660-024-0020(1)(d). The detailed transportation analysis will occur after the adoption of the boundary amendments and plan designations.

The City conducted planning level review of service provision for all of the areas studied for possible inclusion in the UGB as part of the early five UGB expansion concepts. Further analysis was conducted as the 2012 Public Comment Draft was developed, revisions considered, and refinement options reviewed. The result of the planning level service analysis found that:

- Services could be provided to all of the areas under study
- No single alternative proved best when all service factors were considered. In short, some alternatives performed best under a single service (wastewater for example), but not as well under other services (See Figure 1 and ***Exhibits 5.2 and 5.4***).
- The dispersed concept as refined and proposed best balanced the provision of the various services.

The UGB Steering Committee also noted the following considerations and balancing of these issues in their final recommendation (see ***Exhibit 5.4-6***):

- **Transportation**: Efforts to distribute transportation impacts and reduce the amount of new land use in areas with more significant transportation impacts; efforts to distribute land uses and not "put all eggs in one basket" so there are different areas that could accommodate growth without the potential for transportation constraints in one area limiting future growth for the full extent of the additional lands.
- **Sewer**. Efforts to mostly serve properties with gravity sewer rather than pump stations/lift stations; efforts to use available downstream capacity without exceeding it; if additional downstream capacity is necessary, efforts to limit the number or extent of new capital projects and associated costs.
- **Water**. Consideration of future fire flow and water pressure requirements; consideration of which types of distribution and storage facilities are most cost-effective and desirable; efforts to generally serve properties in the same pressure zones as adjacent areas already in the UGB; efforts to establish service areas that could achieve cost efficiencies from economies of scale.
- **Public Safety**. Efforts to use existing facilities and response areas efficiently; efforts to avoid areas with limited transportation connectivity and proximity to wildfire hazards.

Additional analysis conducted for the work beginning in 2013 is also provided in the October 2013 materials, with some additional analysis completed since then.

The analysis provided the basis for review of the refined study areas shown in Figure 4-2 of the Urbanization Element Addendum 2.

Goal 14 Location Factor 3: Comparative environmental, energy, economic and social consequences

Goal 14 Location Factor 3 Finding: Satisfied. Prior to 2013, staff and the UGB Steering Committee considered comparative environmental, energy, economic and social consequences throughout the alternatives analysis. The final recommendation by the UGB Steering Committee (see ***Exhibit 5.4-6*** - memo from Committee to local decision makers dated April 11, 2012) described the balancing process and key considerations of the Committee in making their final recommendation. The conclusion was that the recommended boundary, best balances a host of issues, and these issues pertain to the relative environmental, energy, economic, and social consequences when compared to other alternatives.

Comparative analysis of different alternatives to meet the identified need in the Urbanization Element was conducted at several steps, including issues pertaining to economic, environmental, energy, and social consequences. This included the evaluation of five initial concepts (***Exhibit 5.4-2***) and development of the initial public comment draft concept (***Exhibit 5.4-3***); review of the initial draft compared to option areas and associated trade-offs (***Exhibit 5.4-4***), and in review of the different refinement concepts (***Exhibit 5.4-5***). The Committee's boundary recommendation reflected their balancing of issues related to economic, environmental, energy, and social consequences in a manner that best balanced these issues.

For the work beginning in 2013, the study areas already represented a narrowed set of study areas for further consideration, and the comparative analysis conducted prior to 2013 largely led to the resulting study areas that were evaluated beginning in 2013. The proposed boundary reflects the balancing of these issues within the remaining study areas.

Goal 14 Location Factor 4: Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB.

Goal 14 Location Factor 4 Finding: Satisfied. Section VI of the findings provides background information, including information under the 'Zoning' heading, and a zoning map ***Exhibit 5.7***.

1. The lands proposed for inclusion are exceptions lands which either (1) abut the existing UGB, (2) are adjacent to other exceptions lands (predominantly Rural-Residential), or (3) are adjacent to public lands.
2. There are almost no areas that are adjacent to lands with farm (EFU or FR) zoning. In the few locations where there is proximity to EFU or FR land – to the southwest of Area W2/W3, there is at least separation by a an arterial roadway, and Rural-Residential land in the vicinity. Areas adjacent to forest lands are predominantly near Woodlot Resource

(WR) and not Forest Commercial (FC). Uses on some of the nearby properties with WR zoning are recreational – such as Cathedral Hills Park west of I/K, and Pearce Park east of Area H. Area A is mostly surrounded by Rural-Residential zoning, with WR at one corner to the northeast. The WR-zoned property north of W2/W3 is separated by the railroad tracks.

Most areas are not near farm land with EFU or FR zoning or forest lands with WR or FC zoning. Where such zoning is in closer proximity to the areas proposed for inclusion in the UGB, there are geographic circumstances that provide for compatibility.

Finding for Criterion 13.6.3(a). The proposed inclusion meets applicable goals and guidelines of the State of Oregon: Satisfied. Based on the extensive alternatives analysis process, and with 2014 updates to the Urbanization Element, the proposed UGB boundary amendment meets all applicable criteria after consideration of land needs, including Goal 14 Need Factors as met in the Urbanization Element, the ORS 197.298 priorities for inclusion of lands, the OAR 660-024-0060 boundary location requirements, and the Goal 14 Location Factors.

CRITERION (b): The proposed inclusion is consistent with the goals and policies of the Comprehensive Plan.

FINDING: Satisfied. The proposed inclusion is consistent with the provisions of the Comprehensive Plan intended to meet the needs identified in the Urbanization Element, including lands for housing, employment, parks and open space, in a manner that can be cost effectively served with public facilities and services, avoid and mitigate natural hazards, separate rural from urbanizable land, and protect special resources while meeting identified needs.

CRITERION (c): The applicant has demonstrated need to meet the population growth requirement:

1. **as defined by residential, commercial, industrial, public, and semi-public land requirements as determined by the Comprehensive Plan, as best met by the proposal versus other available alternatives; or**

2. **as defined by a need to meet the land use requirements of a given area, sub-area or neighborhood of the Boundary, consistent with the Comprehensive Plan policies for that area, sub-area, or neighborhood.**

FINDING: Satisfied. The proposed UGB amendment meets the need identified in the 2014 Urbanization Element update in Addendum 2. See previous findings under Criterion 13.6.3(a) Section A: Goal 14 Need Criteria pertaining to the need and other available alternatives.

CRITERION (d): The applicant has demonstrated that the proposed inclusion recognized the development patterns endorsed by the Comprehensive Plan.

FINDING: Satisfied. The Boundary Amendment, as proposed, is sized to meet the land needs identified in the updated Urbanization Element. Together with the

proposed Comprehensive Plan Map designations, the Boundary Amendment analysis addresses site characteristics needed for different land uses, and addresses a development pattern that provides for orderly and economic provision of services, consideration of topographic constraints, and land use adjacencies consistent with the policies outlined in the 2014 Urbanization Element Addendum 2 update.

CRITERION (e): The proposed inclusions are not agricultural lands supporting a commercial agricultural enterprise.

FINDING: Satisfied. With the removal of Area H1.1 from the proposal, the proposed UGB expansion areas include only exception lands.

CRITERION (f): The proposed inclusions are contiguous to the Urban Growth Boundary.

FINDING: Satisfied. This criterion has the same meaning as "land adjacent to an urban growth boundary" as used in ORS 197.298(1)(b) with the meaning stated in OAR 660-024-0060(4). This criterion is satisfied as addressed in the findings of compliance with the referenced statute and administrative rule.

CRITERION (g): The proposed inclusion can be provided with the full range of basic urban services in an economical manner.

FINDING: Satisfied. See findings related to urban services, which are presented in sections C (660-024-0060 Boundary Location Alternatives Analysis) and D (Goal 14 Location Factors) above. Comparative public facilities and services analysis was conducted during the alternatives analysis. Public facilities plans will be updated with modeling of future land use based on the adopted boundaries and plans before urban zoning is applied to most all or properties.

CRITERION (h): Allow for citizen review and comment.

FINDING: Satisfied. See findings under Criterion 13.6.3(a), Statewide Planning Goal 1.

CRITERION (i): Allow for review and comment for affected governmental units and other agencies.

FINDING: Satisfied. See findings under Statewide Planning Goal 2 above. In addition, agencies have provided more recent review and comment.

CRITERION (j): If property is included within the Boundary, the zoning of the included property shall be consistent with the Comprehensive Plan Land Use Map for the Urban Growth Boundary.

FINDING: Satisfied. The areas to be included currently have county rural zoning, and will retain that zoning for an interim period. The zoning, and the future transition from rural to urban zoning consistent with the urban comprehensive plan map designations, are consistent with the policies in the interim intergovernmental agreement for management of the UGB expansion

areas. The attached exhibits include information about the policy alternatives for timing of transition from rural to urban zoning, to be considered during the next year.

Urban Reserve Designation (Criteria: Statewide Planning Goal 14, ORS 195.145, OAR 660 Division 21).

Based on the new forecast, the land needs and areas within the proposed UGB and Urban Reserves comprise less land than was within the UGB proposed in 2012 based on the previously adopted forecast. They are scaled down proportionally from the previously adopted needs, and therefore, the Urban Reserve areas were subject to the same analysis that occurred for evaluation of UGB expansion areas. Therefore, the study areas and alternatives analysis is also applicable to the proposed Urban Reserve areas. However, the Urbanization Element Addendum 2 update summarizes issues and differences when the UGB and Urban Reserve areas must separately meet needs for their respective planning periods that result when the areas can't be planned as a single larger boundary to meet the same needs without the allocations to the respective planning periods. Those findings are incorporated herein by reference.

Statewide Planning Goal 14.

FINDING: Satisfied. The same Goal 14 analysis conducted for the UGB expansion areas is applicable to the Urban Reserve areas. However, the draft proposal for the Urban Reserve included Area H1.1, which included the only farm resource land proposed for inclusion in the UGB expansion areas or Urban Reserve. The findings on Pages 32-34 of these findings discussed the inclusion of resource land in this location for employment use. However, the Planning Commission recommends that area H1.1 be excluded from the Urban Reserve.

ORS 195.145.Urban reserves; when required; limitation; rules.

(1) To ensure that the supply of land available for urbanization is maintained:

(a) Local governments may cooperatively designate lands outside urban growth boundaries as urban reserves subject to ORS 197.610 to 197.625 and 197.626.

(b) Alternatively, a metropolitan service district established under ORS chapter 268 and a county may enter into a written agreement pursuant to ORS 190.003 to 190.130, 195.025 or 197.652 to 197.658 to designate urban reserves. A process and criteria developed pursuant to this paragraph are an alternative to a process or criteria adopted pursuant to paragraph (a) of this subsection.

(2) (a) The Land Conservation and Development Commission may require a local government to designate an urban reserve pursuant to subsection (1)(a) of this section during its periodic review in accordance with the conditions for periodic review under ORS 197.628.

(b) Notwithstanding paragraph (a) of this subsection, the commission may require a local government to designate an urban reserve pursuant to subsection (1)(a) of this section outside of its periodic review if:

(A) The local government is located inside a Primary Metropolitan Statistical Area or a Metropolitan Statistical Area as designated by the Federal Census Bureau upon November 4, 1993; and

(B) The local government has been required to designate an urban reserve by rule prior to November 4, 1993.

(3) In carrying out subsections (1) and (2) of this section:

(a) Within an urban reserve, neither the commission nor any local government shall prohibit the siting on a legal parcel of a single family dwelling that would otherwise have been allowed under law existing prior to designation as an urban reserve.

(b) The commission shall provide to local governments a list of options, rather than prescribing a single planning technique, to ensure the efficient transition from rural to urban use in urban reserves.

(4) Urban reserves designated by a metropolitan service district and a county pursuant to subsection (1)(b) of this section must be planned to accommodate population and employment growth for at least 20 years, and not more than 30 years, after the 20-year period for which the district has demonstrated a buildable land supply in the most recent inventory, determination and analysis performed under ORS 197.296.

(5) A district and a county shall base the designation of urban reserves under subsection (1)(b) of this section upon consideration of factors including, but not limited to, whether land proposed for designation as urban reserves, alone or in conjunction with land inside the urban growth boundary:

(a) Can be developed at urban densities in a way that makes efficient use of existing and future public infrastructure investments;

(b) Includes sufficient development capacity to support a healthy urban economy;

(c) Can be served by public schools and other urban-level public facilities and services efficiently and cost-effectively by appropriate and financially capable service providers;

(d) Can be designed to be walkable and served by a well-connected system of streets by appropriate service providers;

(e) Can be designed to preserve and enhance natural ecological systems; and

(f) Includes sufficient land suitable for a range of housing types.

(6) A county may take an exception under ORS 197.732 to a statewide land use planning goal to allow the establishment of a transportation facility in an area designated as urban reserve under subsection (1)(b) of this section.

(7) The commission shall adopt by goal or by rule a process and criteria for designating urban reserves pursuant to subsection (1)(b) of this section.

FINDING: Satisfied. The Planning Commission recommends exclusion of Area H1.1 from the Urban Reserve. The provisions of ORS 195.145 applicable to Grants Pass are satisfied, and required management provisions are addressed in the proposed Intergovernmental Agreement for the Urban Reserve Areas.

OAR 660 Division 21.

660-021-0030. Determination of Urban Reserve.

(1) Urban reserves shall include an amount of land estimated to be at least a 10-year supply and no more than a 30-year supply of developable land beyond the 20-year time frame used to establish the urban growth boundary. Local governments designating urban reserves shall adopt findings specifying the particular number of years over which designated urban reserves are intended to provide a supply of land.

(2) Inclusion of land within an urban reserve shall be based upon the locational factors of Goal 14 and a demonstration that there are no reasonable alternatives that will require less, or have less effect upon, resource land. Cities and counties cooperatively, and the Metropolitan Service District for the Portland Metropolitan Area Urban Growth Boundary, shall first study lands adjacent to, or nearby, the urban growth boundary for suitability for inclusion within urban reserves, as measured by the factors and criteria set forth in this section. Local governments shall then designate, for inclusion within urban reserves, that suitable land which satisfies the priorities in section (3) of this rule.

(3) Land found suitable for an urban reserve may be included within an urban reserve only according to the following priorities:

(a) First priority goes to land adjacent to, or nearby, an urban growth boundary and identified in an acknowledged comprehensive plan as an exception area or nonresource land. First priority may include resource land that is completely surrounded by exception areas unless these are high value crop areas as defined in Goal 8 or prime or unique agricultural lands as defined by the United States Department of Agriculture;

(b) If land of higher priority is inadequate to accommodate the amount of land estimated in section (1) of this rule, second priority goes to land designated as marginal land pursuant to former ORS 197.247 (1991 edition);

(c) If land of higher priority is inadequate to accommodate the amount of land estimated in section (1) of this rule, third priority goes to land designated in an acknowledged comprehensive plan for agriculture or forestry, or both. 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.

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

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

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

(5) Findings and conclusions concerning the results of the consideration required by this rule shall be adopted by the affected jurisdictions.

FINDING: Satisfied.

(1) The Urbanization Element contains findings specifying the Urban Reserve is for an additional 10-year supply for 2033-2043.

(2) The Planning Commission recommends exclusion of Area H1.1 from the Urban Reserve. Therefore, the Planning Commission recommends the following revisions to the findings: The analysis for Goal 14 above was based on the Goal 14 locational factors, as addressed in the Goal 14 findings above. ~~The analysis above, and findings in the 2014 Urbanization Element Addendum 2 demonstrate there are no reasonable alternatives to meet the employment land need without inclusion of this resource land which is contiguous to the industrial areas in the current UGB. Further, inclusion of the resource lands in Area H1.1 will not negatively affect other agricultural or forest uses. The site is bordered on the west and south by the current UGB, on the north by Interstate 5 and residential exceptions areas, and on the east by forest-zoned lands, which are a county park and one 18-acre parcel, that abut rural residential uses. The site is a logical extension of the industrial uses to the west. As discussed under Criterion (a), sites with locations and characteristics suitable for industrial use are scarce, given development patterns, parcelization, and topographic and service constraints.~~

(3) The Planning Commission recommends exclusion of Area H1.1 from the Urban Reserve. Therefore, the Planning Commission recommends the following revisions to the findings: ***All lands are priority 1 exception lands adjacent to the UGB.*** ~~Except for a portion of Area H1.1, all lands are priority 1 exception lands adjacent to the UGB. Area H1.1 includes approximately 43 acres of farm resource land contiguous to the industrial lands in the current UGB. As illustrated on the zoning map, the resource land is part of an isolated island of resource land (farm and forest) surrounded entirely by the current UGB and exception lands. Therefore, these lands are also first priority. Even these did not quality as first priority, they would be needed for employment use as lower priority lands.~~

(4) The Planning Commission recommends exclusion of Area H1.1 from the Urban Reserve. Therefore, the Planning Commission recommends the following revisions to the findings: ~~Due to the proximity to the industrial lands in the current UGB, these lands would qualify as lower priority lands due to considerations of provision of urban services and efficiency of land uses.~~

(5) These findings are intended to meet the requirements of Subsection (5). Further, the Urbanization Element identifies the conceptual land use plans necessary to conduct

infrastructure planning and to consider the designation of lands upon their future inclusion within the UGB.

660-021-0040. Urban Reserve Area Planning and Zoning.
660-021-0050. Urban Reserve Agreements

FINDING: Satisfied. The proposed Intergovernmental Agreement for the Urban Reserve Areas includes provisions that address the requirements of 0040 and 0050.

VIII. SUMMARY OF FINDINGS OF CONFORMANCE WITH APPLICABLE CRITERIA:

Based on the findings above, all applicable criteria are satisfied for the:

- **Comprehensive Plan Amendments** as presented, with the exclusion of Area H1.1, with minor revisions in ***Exhibits 4 and 6,*** and subject to additional findings regarding the short-term supply for employment lands. (Consistent with criteria in Section 13.5.4 of the Comprehensive Plan).
- **Development Code Text Amendments** as presented, with minor revisions in ***Exhibits 4 and 6***. (Consistent with criteria in Section 4.103 of the Development Code)
- **Zoning Map Amendments** as presented, with minor revisions in ***Exhibits 4 and 6.*** (Consistent with criteria in Section 4.033 of the Development Code)
- **UGB Amendment** as presented, with minor revisions in ***Exhibit 4.*** (Consistent with criteria in Section 13.6.3 of the Comprehensive Plan, Statewide Planning Goal 14, ORS 197.298, and OAR 660 Division 24).
- **Urban Reserve Boundary Designation** as presented, with the exclusion of Area H1.1, and with minor revisions in ***Exhibit 4.*** (Consistent with criteria in Statewide Planning Goal 14, ORS 197.145, OAR 660 Division 21).
- **Intergovernmental Agreements.** *NOTE: No formal recommendation was required by the Urban Area Planning Commission. They did not make findings or a recommendation.*

IX. RECOMMENDATION:

Based on the above findings, the Urban Area Planning Commission found that the applicable criteria were satisfied and recommended approval of the proposed amendments as presented below:

Commissioners Fitzgerald, Coulter, Regan, MacMillan, Arthur, Kellenbeck, and McVay were present. Commissioner McIntire was absent. The votes are presented below.

NOTE: *There was discussion about whether Area H1.1 should be recommended for inclusion in the Urban Reserve as proposed, recommended for inclusion in the UGB rather than the Urban Reserve, or recommended for exclusion from the UGB and Urban Reserve. This related to several items below, so the Planning Commission first took a vote on that issue then voted on the individual items as affected by that vote below. A motion was made to exclude Area H1.1 from the Urban Reserve and UGB, and that motion passed 4-3-0. (Commissioners Kellenbeck, MacMillan, Regan, and McVay voted*

for the motion to exclude Area H1.1. Commissioners Fitzgerald, Coulter, and Arthur voted against the motion).

1. **14-40500008.a.1. County Coordinated Population Forecast Update:**
   NOTE: No action was needed by the Urban Area Planning Commission. The Rural Planning Commission unanimously recommended approval at a separate hearing.

2. **14-40500008.a.2. Population Element 6 Update (Addendum 1):**
   The Urban Area Planning Commission ***recommended approval*** of the amendment as proposed. The vote was 7-0-0. (Motion by Kellenbeck, Second by MacMillan).

3. **14-40500008.a.3. Housing Element 9 Update (Addendum 1):**
   The Urban Area Planning Commission ***recommended approval*** of the amendment as proposed. The vote was 7-0-0. (Motion by Kellenbeck, Second by MacMillan).

4. **14-40500008.a.4. Economic Element 8 Update (Addendum 1):**
   The Urban Area Planning Commission ***recommended approval*** as proposed, with the following revisions:

   - Revisions to Section 3 to reflect exclusion of Area H1.1 from the Urban Reserve.
   - Additional findings regarding the short-term employment land supply, pertaining to comments from DLCD.

   The vote was 7-0-0. (Motion by Kellenbeck, Second by Regan).

5. **14-40500008.a.5. Urbanization Element 14 Update (Addendum 2):**
   The Urban Area Planning Commission ***recommended approval*** of the amendment as proposed, with the following revisions:

   - Additional revisions in Exhibits 4 & 6 of the staff report.
   - Revisions to reflect the exclusion of Area H1.1 from the Urban Reserve.

   The vote was 7-0-0. (Motion by MacMillan, Second by Coulter).

6. **14-40500008.a.6. Comprehensive Plan Element 13 Amendment (Policies): UGB and Urban Reserve Criteria and Procedures; Internal Consistency with Efficiency Measures):**
   The Urban Area Planning Commission ***recommended approval*** of the amendment as proposed. The vote was 7-0-0. (Motion by MacMillan, Second by Kellenbeck).

7. **14-40500008.b. Development Code Text Amendments:**
   The Urban Area Planning Commission ***recommended approval*** of the amendment as proposed, with the following revisions:

   - Additional revisions in Exhibits 4 & 6 of the staff report.

   The vote was 6-1-0. (Motion by Coulter, Second by Kellenbeck. Commissioners Coulter, Kellenbeck Regan, Cowell, Arthur, and McVay voted for the motion. Commissioner Fitzgerald voted against the motion).

8. **14-40500008.c.1. Interim Intergovernmental Agreement (IGA) for UGB expansion areas:**
   NOTE: No formal recommendation was required by the Urban Area Planning Commission. They did not make a recommendation.

9. **14-40500008.c.2. Intergovernmental Agreement (IGA) for Urban Reserve areas:**
   NOTE: No formal recommendation was required by the Urban Area Planning Commission. They did not make a recommendation.

10. **14-40400001.a. Urban Growth Boundary (UGB) Amendment:**
    The Urban Area Planning Commission ***recommended approval*** of the amendment as proposed, with the following revisions:

    - Additional revisions in Exhibit 4 of the staff report.

    The vote was 7-0-0. (Motion by Kellenbeck, Second by MacMillan).

11. **14-40400001.b. Urban Reserve Boundary Designation:**
    The Urban Area Planning Commission ***recommended approval*** of the amendment as proposed, with the following revisions:

    - Additional revisions in Exhibit 4 of the staff report.
    - Exclusion of Area H1.1 from the Urban Reserve.

    The vote was 6-1-0. (Motion by MacMillan, Second by Regan. Commissioners MacMillan, Regan, Fitzgerald, Kellenbeck, Arthur, and McVay voted for the motion. Commissioner Coulter voted against the motion).

12. **14-40200003.a. UGB Comprehensive Plan Amendments (UGB Expansion Areas):**
    The Urban Area Planning Commission ***recommended approval*** of the amendment as proposed, with the following revisions:

    - Additional revisions in Exhibit 4 of the staff report.

    The vote was 7-0-0. (Motion by Coulter, Second by Regan).

13. **14-40200003.b. Urban Reserve Land Use Allocations and Map:**
    The Urban Area Planning Commission ***recommended approval*** of the amendment as proposed, with the following revisions:

    - Additional amendments in Exhibit 4 of the staff report.
    - Exclusion of Area H1.1 from the Urban Reserve.

    The vote was 6-1-0. (Motion by MacMillan, Second by Kellenbeck. Commissioners MacMillan, Kellenbeck, Regan, Fitzgerald, Arthur, and McVay voted for the motion. Commissioner Coulter voted against the motion).

14. 14-40200003.c. Comprehensive Plan Map Amendments & Overlay in Current UGB:
The Urban Area Planning Commission ***recommended approval*** of the amendment as proposed, with the following revisions:

- Additional revisions in Exhibits 4 and 6 of the staff report.

The vote was 7-0-0. (Motion by Kellenbeck, Second by MacMillan).

X. FINDINGS APPROVED BY THE URBAN AREA PLANNING COMMISSION this 22nd day of October, 2014

Gerard Fitzgerald, Chair

NOTE: This is a legislative decision. State law does ***not*** require that a decision be made on the application within 120 days.

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