



# Oregon

Theodore R. Kulongoski, Governor

Department of Land Conservation and Development

635 Capitol Street, Suite 150

Salem, OR 97301-2540

(503) 373-0050

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www.lcd.state.or.us

## NOTICE OF ADOPTED AMENDMENT

August 15, 2008

TO: Subscribers to Notice of Adopted Plan  
or Land Use Regulation Amendments

FROM: Mara Ulloa, Plan Amendment Program Specialist

SUBJECT: City of Hubbard Plan Amendment  
DLCD File Number 001-07



The Department of Land Conservation and Development (DLCD) received the attached notice of adoption. Due to the size of amended material submitted, a complete copy has not been attached. A copy of the adopted plan amendment is available for review at the DLCD office in Salem and the local government office.

Appeal Procedures\*

### **DLCD ACKNOWLEDGMENT or DEADLINE TO APPEAL: September 3, 2008**

This amendment was submitted to DLCD for review 45 days prior to adoption. Pursuant to ORS 197.830 (2)(b) only persons who participated in the local government proceedings leading to adoption of the amendment are eligible to appeal this decision to the Land Use Board of Appeals (LUBA).

If you wish to appeal, you must file a notice of intent to appeal with the Land Use Board of Appeals (LUBA) no later than 21 days from the date the decision was mailed to you by the local government. If you have questions, check with the local government to determine the appeal deadline. Copies of the notice of intent to appeal must be served upon the local government and others who received written notice of the final decision from the local government. The notice of intent to appeal must be served and filed in the form and manner prescribed by LUBA, (OAR Chapter 661, Division 10). Please call LUBA at 503-373-1265, if you have questions about appeal procedures.

**\*NOTE: THE APPEAL DEADLINE IS BASED UPON THE DATE THE DECISION WAS MAILED BY LOCAL GOVERNMENT. A DECISION MAY HAVE BEEN MAILED TO YOU ON A DIFFERENT DATE THAN IT WAS MAILED TO DLCD. AS A RESULT YOUR APPEAL DEADLINE MAY BE EARLIER THAN THE ABOVE DATE SPECIFIED.**

Cc: Gloria Gardiner, DLCD Urban Planning Specialist  
Steve Oulman, DLCD Regional Representative  
Suzanne Dufner, City of Hubbard

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AUG 14 2008

LAND CONSERVATION AND DEVELOPMENT

NOTICE OF ADOPTION

Must be filed within 5 working days See OAR 660-18-040

Jurisdiction: City of Hubbard Local File Number: LA07-02
Date of Adoption: 8/12/08 Date Mailed: 8/13/08
Date Proposal was Provided to DLCD: April 1, 2007

Type of Adopted Action: (Check all that apply)

- X Comprehensive Plan Text Amendment X Comprehensive Plan Map Amendment
Land Use Regulation Amendment Zoning Map Amendment
New Land Use Regulation Other: (Please Specify Type of Action)

Summarize the adopted amendment. Do not use technical terms. Do not write "See Attached."

This amendment included adoption of a revised Economics Section of the Hubbard Comprehensive Plan and a 19-acre urban growth boundary expansion for future commercial and industrial use.

Describe how the adopted amendment differs from the proposed amendment. If it is the same, write "Same." If you did not give notice for the proposed amendment, write "N/A."

The original amendment also included revisions to the Hubbard Comprehensive Plan Population, Housing and Land Use Sections and a 92-acre expansion of the UGB for future residential use. The proposed UGB expansion for future commercial and industrial use was expanded to include approximately 4.7 acres of additional developed commercial land and 2.6 acres of right-of-way.

Plan Map Changed from: Marion County Rural Residential and Commercial to City of Hubbard Industrial

Zone Map Changed from: Marion County AR-5 and Commercial to Marion County UT-5

Location: South of the Hubbard, west of Pacific Highway 99E - Marion County Assessor Map Number 41W33DC, Tax lots 400, 500, 800, 900, 1000 and 1100

Acres Involved: approx. 19 acres

Specify Density: Previous: n/a New: n/a

Applicable Statewide Planning Goals: 1, 2, 9, 11, 12, 14

Was an Exception Adopted? Yes: No: X

DLCD File Number: 001-07 (16008)

Did the Department of Land Conservation and Development receive a notice of Proposed Amendment **FORTY FIVE (45) days prior to the first evidentiary hearing.** Yes:  X  No:

If no, do the Statewide Planning Goals apply. Yes:   No:

If no, did the Emergency Circumstances Require immediate adoption. Yes:   No:

Affected State or Federal Agencies, Local Governments or Special Districts:  None.

Local Contact:  Suzanne Dufner, City Planner  Area Code + Phone Number:  (503) 540-1616

Address:  MWVCOG, 105 High St SE

City:  Salem  Zip Code+4:  97301-3667

## ADOPTION SUBMITTAL REQUIREMENTS

This form **must be mailed** to DLCD **within 5 working days after the final decision** per ORS 197.610, OAR Chapter 660 – Division 18.

1. Send this form and TWO (2) Copies of the Adopted Amendment to:  
**ATTENTION: PLAN AMENDMENT SPECIALIST**  
**DEPARTMENT OF LAND CONSERVATION AND DEVELOPMENT**  
**635 CAPITOL STREET NE, SUITE 150**  
**SALEM, OREGON 97301-2540**
2. Submit **TWO (2) copies** of the adopted material, if copies are bound please submit **TWO (2) complete copies** of documents and maps.
3. Please note: Adopted materials must be sent to DLCD not later than **FIVE (5) working days** following the date of the final decision on the amendment.
4. Submittal of this Notice of Adoption must include the text of the amendment plus adopted findings and supplementary information.
5. The deadline to appeal will be extended if you submit this notice of adoption within five working days of the final decision. Appeals to LUBA may be filed within **TWENTY-ONE (21) days** of the date the “Notice of Adoption” is sent to DLCD.
6. In addition to sending the “Notice of Adoption” to DLCD, you must notify persons who participated in the local hearing and requested notice of the final decision.
7. **Need more copies?** You can copy this form onto 8 ½ x11 green paper only; or call the DLCD office at (503) 373-0050; or fax your request to: (503) 378-5518; or Email your request to Larry.French@state.or.us ATTENTION: PLAN AMENDMENT SPECIALIST.

ORDINANCE 300-2008

AN ORDINANCE AMENDING THE HUBBARD COMPREHENSIVE PLAN AND URBAN  
GROWTH BOUNDARY

WHEREAS, the City of Hubbard deemed it necessary to update the Economics Section of the Hubbard Comprehensive Plan; and

WHEREAS, the City has prepared findings in support of an 19-acre expansion of the existing urban growth boundary; and

WHEREAS, on December 11, 2007 and May 13, 2008 the City Council reviewed the proposed amendments during a public hearing at which time the public was given full opportunity to be present and heard on the matter; and

WHEREAS, proper notice of the said public hearing was given to the public pursuant to applicable state statutes; and,

WHEREAS, at the close of the public hearing the City Council voted to adopt the proposed amendments with revisions as stated at the December 11, 2007 and May 13, 2008 Council meetings; now therefore,

THE CITY OF HUBBARD ORDAINS AS FOLLOWS:

Section 1. The City Council of the City of Hubbard does hereby adopt those certain amendments to the Comprehensive Plan pertaining to Economics, Marion County Coordination and findings in support of an urban growth boundary expansion attached hereto as Exhibit "A".

Section 2. The City Council of the City of Hubbard deems and desires it necessary for the preservation of the health, peace, and safety of the City of Hubbard that this Ordinance take effect at once, and therefore an emergency is hereby declared to exist and this Ordinance shall be in full force and effect from and after its passage and approval.

PASSED and adopted by the City Council of the City of Hubbard on this 12<sup>th</sup> day of August  
\_\_\_\_\_ 2008, by the following votes:

AYES: 4

NAYS: 0

Approved by the Mayor on this 12 day of AUGUST 2008.

T. McCain  
Tom McCain, Mayor

Attest:

Vickie L. Nogle

Vickie L. Nogle, MMC, City Recorder

# **EXHIBIT A:**

## **Hubbard Comprehensive Plan Amendments and Urban Growth Boundary Expansion Findings of Fact**

## HUBBARD COMPREHENSIVE PLAN AMENDMENTS

### ECONOMICS SECTION

Statewide Planning Goal 9 (Economic Development) requires cities to provide an adequate supply of suitable sites for a variety of industrial and other employment uses. This section of the Hubbard Comprehensive Plan serves as an Economic Opportunity Analysis (EOA) to fulfill the Goal 9 requirements and ensure an adequate supply of land is available for new and expanding businesses in Hubbard over the 20 year planning horizon. This element of the Comprehensive Plan includes a description of the economic trends combined with an assessment of the community's economic strength and weaknesses to determine the economic development potential of the area. This chapter also includes a description of the amount of land and types of sites needed to fulfill Hubbard's economic needs over the next 20 years. This assessment of future land needs is compared with the supply of vacant and underutilized commercial and industrial lands available to determine whether or not there are any deficiencies in the land supply. The chapter concludes with a discussion of the planning implications and policy recommendations.

#### Overview of the Hubbard Economy

The economy of the Hubbard area was built chiefly around the agricultural production of the valley. During the late 1980s and into the 1990s the City significantly increased its industrial base. The largest employers include meat packing, auto sales, a seed cleaning operation, clothing production, numerous manufacturing businesses, telecommunication services, construction services, and related commercial activities.

Hubbard provides limited commercial services in a small downtown area. The city's residents receive a majority of commercial services from larger communities nearby such as, Woodburn and Salem. The city also has several industrial developments and an industrial park. The community has several areas available for industrial and commercial development. Commercial areas zoned Commercial General (CG) and Industrial-Commercial (IC) are located on Highway 99E. Smaller properties zoned Residential-Commercial are located near the Old Town area of Hubbard located west of Highway 99E.

Industrial properties are located in the Hubbard Industrial Park located on Industrial Avenue one block east of Highway 99E. In addition, properties located on Highway 99E zoned Industrial-Commercial (IC) can also be developed for the full range of industrial uses.

**Table 1** shows employment data for the Hubbard area based on employer records with a 97032 zip code. Much of the employment for Hubbard residents is in the non-manufacturing sector.

**Economics -Table 1  
Hubbard Employment  
2004**

<b>Industry</b>	<b>Number of Jobs</b>	<b>Percent of Total</b>
Agriculture, Forestry, Fishing & Hunting (11*)	443	28.2%
Manufacturing (31)	386	24.5%
Construction (23)	255	16.2%
Wholesale Trade (42), Transportation and Warehousing (48)	68	4.3%
Retail Trade (44)	143	9.1%
Real Estate (53) and Services (54, 55, 56, 62, 71, 72, 81, 99)	204	13.0%
Public Sector (Local, State and Federal Employment)	74	4.7%
<b>Total</b>	<b>1573</b>	<b>100.0%</b>

Source: State of Oregon Employment Department sorted and summarized by MWVCOG, 2007.  
\* Two-digit North American Industry Classification System (NAICS) code.

**National, State and Regional Economic Trends**

Economic activity within the Hubbard area is influenced by greater economic forces found at the national, state and regional levels. How well the overall economy is performing at the national level will in turn have an impact on which businesses experience prosperity and decline in Hubbard and the Willamette Valley region. Recent economic trends and the economic outlook for these areas are the primary basis for our expectations of future economic development in Hubbard.

**National Economic Trends**

National trends that will influence economic development in this region over the next 20 years include<sup>1</sup>:

- Continued westward migration of the U.S. population and the increasing role of amenities and other non-wage factors as determinants of the location decisions of households and firms.
- Growth in Pacific Rim trade, with economic growth in China and India as a driving force.<sup>2</sup>
- The growing importance of education as a determinant of wages and household income.
- The decline of employment in resource-intensive industries and the increase in employment in service-oriented and high-tech manufacturing sectors of the economy.
- The increasing integration of non-metropolitan and metropolitan areas.
- The rebound of U.S. manufacturing focused on production of durable goods.<sup>3</sup>

<sup>1</sup> ECONorthwest, *Woodburn Economic Opportunities Analysis*, June 2001

<sup>2</sup> E. D. Hovee, & Company, LLC: Marion, Polk, and Yamhill Counties *Regional Economic Profile and Strategic Assessment*, March 2007

<sup>3</sup> E. D. Hovee, & Company, LLC: Marion, Polk, and Yamhill Counties *Regional Economic Profile and Strategic Assessment*, March 2007.



## State Economic Trends

The Oregon Employment Department forecasts that total employment in Oregon will add close to 245,000 jobs between 2004 and 2014, an increase of 15 percent<sup>4</sup>. The forecasted growth is close to the average ten-year job growth since 1973, but not as large as the state experienced in the 1990's with the growth of the high-tech manufacturing industry. The Oregon Employment Department identified three broad industries that are expected to account for nearly 60 percent of the state's job growth:

- Professional and business services
- Education and health services, and
- Trade, transportation and utilities.

The Employment Department forecasts additional job losses in the resource-based manufacturing sectors, although at a decreasing rate from the previous forecast period. The Willamette Valley, combined with the Portland Metro Area, are expected to add the majority of jobs over the forecast period.

## Regional Employment

**Table 2** shows covered employment data for the North Marion County region. Combined employment in the communities of Woodburn, Gervais, Hubbard, Aurora, Donald, St. Paul, Scotts Mills, Mt. Angel, and Silverton reached 21,235 in 2004. A large portion of the areas employment is based in natural resources (22 percent of the total). Trade, transportation, and utilities sector also provided 22 percent of the total jobs, followed by federal, state, and local government, which provided 12 percent of jobs. The Employment Division reports that manufacturing employment in the area is varied, with wood products and food and beverage manufacturing accounting for almost one-half of total manufacturing employment. The remaining manufacturing employment was in furniture and related products, machinery, metals, and chemicals, plastics and minerals-related products and transportation equipment manufacturing.

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<sup>4</sup> State of Oregon, Employment Department. *Employment Projections by Industry 2004-2014*, July 2005.

**Economics -Table 2**  
**North Marion County Covered Employment by Industry**  
**2004**

Industry	Percent
Trade/Transportation/Utilities	22%
Natural Resources/Mining	22%
Government	12%
Manufacturing	11%
Education/Health Services	9%
Construction	7%
Leisure/Hospitality	6%
Professional/Business Services	4%
Other Services	3%
Financial Activities	3%
Information	1%
<b>Total</b>	<b>100.0%</b>

Source: State of Oregon Employment Department, Employment Snapshot of North Marion County, 2005.

**Table 3** shows projected employment within Marion, Polk, and Yamhill counties for the period from 2004 through 2014. Industry employment in the region is expected to grow from 169,400 in 2004 to 194,900 in 2014. This represents a growth rate of 15.1 percent. Oregon's statewide industry employment is also projected to increase by 15 percent over that time.<sup>5</sup>

**Economics -Table 3**  
**Employment Projections by Selected Industry**  
**Marion, Polk, and Yamhill Counties, 2004 and 2014**

Industry	2004	2014	Percent Change 2004-2014
Total Non-Farm Payroll Employment	169,400	194,900	15.1%
Manufacturing, Total	20,100	20,000	-0.5%
Durable Goods	10,900	10,800	-0.9%
Non-durable Goods	9,200	9,200	0.0%
Non-Manufacturing, Total	149,300	174,900	17.1%
Construction	8,800	10,700	21.6%
Finance, Insurance, Real Estate	8,300	9,200	10.8%
Wholesale and Retail Trade	28,000	32,300	15.4%
Services	58,100	72,000	23.9%
Government	42,500	46,800	10.1%

Source: State of Oregon, Employment Department. *Regional Profile Industry Employment in Region 3, 2004.*

<sup>5</sup> Oregon Employment Department, *Regional Profile Industry Employment in Region 3, 2002.*

The Oregon Employment Department indicates that the services and construction industries will experience the most significant job growth within the region through 2014. The region's agricultural and food processors will continue to struggle as they face national and international competition. Government employment is forecast to grow more slowly than the average of all industries over the period through 2014.<sup>6</sup>

### **Economic Opportunities and Constraints**

The following section examines factors that influence economic growth opportunities in Hubbard, including a discussion of the City's economic strengths and weaknesses. By identifying the City's strengths and weaknesses, the City can begin to understand which industries have the greatest potential for growth and expansion and what issues the city should work on to improve economic opportunity within the area.

#### **Location**

Hubbard developed, in part, based upon its proximity to agricultural land within the Willamette Valley. Over time, the community has developed as essentially a bedroom community to larger communities such as, Woodburn and Salem. The city's proximity to Salem and Portland markets has resulted in a number of small manufacturing, distribution, and construction contracting firms locating in Hubbard. A number of these firms have located within the Hubbard Industrial Park, located between Highway 99E and J Street (Whiskey Hill Road). More than seventeen businesses are currently located within the Industrial Park. In addition, commercial businesses specializing in durable goods have located in commercial-zoned areas along Highway 99E.

While Hubbard's location serves as an advantage for local manufacturing companies and industries that desire a location in close proximity to the Salem and Portland metro areas, the City's proximity to Woodburn, which is less than a few miles south of Hubbard, put the City at an economic disadvantage for meeting the commercial retail and service needs of the local population. However, as the City's population continues to grow, there will be a corresponding increase in the demand for convenience commercial services to meet the needs of local residents.

#### **Transportation**

Available transportation access is one of the most important factors affecting economic development. Transportation affects the cost of doing business at a location. Firms depend on ready transportation access to ship and receive goods. Ready access allows for reduced production costs and more convenient automobile access for customers and employees.

State Highway 99E runs north/south through the City of Hubbard and connects Salem and Portland markets with a number of communities in north Marion County. Interstate 5 serves as the primary transportation artery in the Willamette Valley and is located approximately two (2) miles west of Hubbard. Access to Interstate 5 is conveniently located less than four (4) miles northwest of the Hubbard at the Hubbard Cutoff (Exit 278), which connects Highway 99E to Interstate 5.

Railroads can be an important form of transportation for businesses that need to transport bulky inputs and finished products. While Hubbard is served by the Southern Pacific Railroad that runs north/south through older areas zoned for industrial use, railroad access is not available for much of the industrial land within the community located within the Industrial Park.

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<sup>6</sup> Oregon Employment Department, *Regional Profile Industry Employment in Region 3*, 2002.

## Utilities

The City has recently completed improvements to both the water and sewer systems. Regarding the water system, the City recently completed a series of water system improvements designed to increase the available system capacity, including the addition of a 1-million gallon reservoir. According to the City's Water System Master Plan, these improvements are intended to serve a population of approximately 3,700 persons.

The City's wastewater treatment facility is designed to serve a population of 5,100 persons. Improvements to the treatment facility designed to increase system efficiency were completed in 2005. These improvements provide for an overall sewer capacity to 3,839 persons.

Areas available for development and zoned for commercial and industrial uses are fully served with water and sewer services. No capacity or service issues exist that will limit future development in these areas.

## Land Cost

The OregonProspector.com is the state's official public-private website for site consultants and businesses interested in relocating or expanding a business in Oregon. This site provides an on-line database of available commercial and industrial properties in Oregon. The most recent database listing shows eight (8) vacant properties in Marion County with advertised sales prices, the majority of which are located in Salem. These properties range in size from 0.06 acres to 540 acres at the recently created Mill Creek Industrial Park. Sale prices for the properties range from \$58,543/acre to \$317,174/acre with an average sales price of \$175,239/acre.

While none of the properties listed are in Hubbard, Marion County Assessor records show that the real market value of several vacant industrial properties in the community is approximately \$89,355/acre. While this obviously does not represent a comprehensive market survey, it does indicate that land costs, particularly in relation to the Salem market, may be lower in the Hubbard area. Lower land cost is often a primary reason for the firms to locate in smaller communities.

## Quality of Life

Quality of life is a subjective standard that is hard to quantify. It includes economic factors, such as income, employment, and housing costs, as well as non-economic factors, such as natural and physical amenities, quality of local education, and cultural and recreational opportunities. Quality of life plays a role in economic development because it affects the relative attractiveness of the city to migrants. Net migration is expected to comprise about 70 percent of Oregon's population growth over the next 20 years.<sup>7</sup> A more attractive quality of life may help Hubbard attract a greater share of in-migrants. These migrants not only bring job skills to various employment sectors, such as construction, services, and retail trade, but some may also start new businesses in the community.

In 2003, the Oregon Downtown Development Association (ODDA) completed a Resource Team Report for Hubbard. The ODDA Report made a number of recommendations intended to improve the appearance of both the Highway 99E commercial area and the city's Old Town commercial area located along 3<sup>rd</sup> Street. The Report recommended pedestrian and streetscape improvements for both of these areas as well as architectural improvements and infill recommendations for the Old Town area.

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<sup>7</sup> Oregon Office of Economic Analysis, *Long-Term Population and Employment Forecast for Oregon, 1997*.

Since the ODDA study was completed and adopted as part of the city's Comprehensive Plan, the City has placed an emphasis on construction of sidewalks along Highway 99E. The City has also recently received a grant from the Oregon Transportation Enhancement Program for sidewalk and pedestrian improvements along the portion of Highway 99E from D Street to the north city limits. Improvements to D Street from Casteel Street to the Highway 99E intersection are also part of this project. Construction of the project is scheduled to begin in 2009.

### **Training Opportunities**

The Woodburn Campus of Chemeketa Community College (CCC), which is located within a few miles south of Hubbard, offers workforce training and career development services. In concert with the Oregon Employment Department, CCC has developed the Woodburn Job and Career Center to assist job seekers find available jobs and receive training to enhance their job skills. The Job and Career Center can also provide specialized training workshops for employers.

The Woodburn Campus also offers services to support small business owners through training programs, mentorships, and information on other available resources such as Small Business Administration Loans.

Under the clustering concept, businesses thrive in particular locations because their network of local connections to a specially skilled local workforce and the availability of local suppliers in proximity to one another generates business advantages that cannot easily be imitated or competed away by low cost competitors.<sup>8</sup>

### **Oregon Site Certification**

Industrial Site Certification documents and assembles information needed by a business considering acquisition and use of a site. A certified site meets specific, market-driven criteria based on the standards of real estate professionals and of the industries that would develop and operate at these locations. Each site receives a consistent level of analysis for development issues.<sup>9</sup>

In order to be considered for certification, an industrial site will need to contain at least 10 net contiguous developable acres, and preferably, the site should be 25 or more acres in size, as well as vacant. Project-ready sites have had necessary environmental and other investigations performed, but they may necessitate that additional capital investment or mitigation work is undertaken during an up to 180-day period.

Each site will be certified for one or more of eight industry profiles. The use of industry development profiles allows the State to identify needed facilities or site improvements and develop capital investment or mitigation plans prior to certification or an actual recruitment.<sup>10</sup>

The industry profiles used for the first round of certification are:

- Heavy Industrial Manufacturing
- General Manufacturing
- Food Processing
- High Technology manufacturing/processing

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<sup>8</sup> From the website: <http://www.oregonclusters.org/faq.html>

<sup>9</sup> From the website: <http://www.econ.state.or.us/IC.htm>

<sup>10</sup> From the website <http://www.econ.state.or.us/ICfacts>

- Campus Industrial/Electronics and Computer Assembly
- Warehouse and Distribution
- Call Center/Business Services
- Rural Industrial

### **City Policies Affecting Economic Development**

The overall economic development goal for the City of Hubbard as stated in the Comprehensive Plan is, "To provide for and maintain a viable and diverse economy while preserving the present sense of community and high level of environmental quality." Policies to help the City achieve this goal and support economic development in Hubbard as stated as follows:

1. The City of Hubbard shall encourage a wide variety of commercial activities in convenient and desirable locations to serve city residents.
2. The City of Hubbard encourages the continuation of business within the City limits along the Highway 99E corridor.
3. The City of Hubbard wishes to develop and maintain a central business area to serve the needs of the resident and the visitor. A specific area between Highway 99E and the railroad right-of-way will be designated for a mixture of commercial and secondary residential uses to provide housing and services within close proximity of each other.
4. To achieve a commercial and industrial development pattern that is balanced with a moderate rate of overall economic growth, the City of Hubbard encourages the location of businesses within the community that create wages able to support a family.
5. Commercial and industrial establishments should contribute to and not detract from the beauty of the community.
6. The City of Hubbard supports the industrial park concept for the area on the southeast end of town to attract larger industrial based businesses to the community.
7. The City of Hubbard shall encourage the development of economic activities that will provide jobs able to utilize the skills of the local labor force.
8. The City of Hubbard will encourage economic development planning and programming activities that serve to stimulate private sector development.
9. The City of Hubbard shall cooperate with relevant federal, state, regional, and local government agencies in economic development planning for the area.

As part of the 2007 update of the Comprehensive Plan, the following additional economic development policies were adopted:

10. The City of Hubbard will support projects and development in commercial areas consistent with the City's adopted 2003 Resource Team Report for Hubbard Oregon prepared by the Oregon Downtown Development Association

11. Consistent with Marion County Framework Plan policies, the City of Hubbard has conducted an Economic Opportunities Analysis (EOA) consistent with the Goal 9 Rule (OAR Chapter 660, Division 9) that:
  - (a) Describes state and regional economic trends;
  - (b) Inventories lands suitable for employment use by parcel size;
  - (c) Assesses community economic development potential;
  - (d) Forecasts future employment; and
  - (e) Estimates the amount of land needed in Commercial and Industrial plan designations to accommodate future employment;
12. The City's policy is to accommodate industrial and commercial growth consistent with the 2007 Hubbard Economic Opportunities Analysis (EOA).
13. The City of Hubbard will continue to work with Marion County, economic development agencies, area economic development groups, and major institutions to provide information to support development of a region-wide strategy promoting a sustainable economy.

#### **Summary of Economic Opportunities and Constraints**

Hubbard has a number of economic opportunities that will help foster economic growth and development over the next 20 years. The city has a number of smaller (less than five (5) acres) vacant industrial and commercial parcels without physical constraints, with good transportation access, and public utilities available. Hubbard is located nearly equidistant from the Portland and Salem metro areas, which are easily accessed via Highway 99 and Interstate 5. The location to markets has attracted a number of small manufacturing firms to the city's industrial park. A number of commercial businesses, specializing in durable goods, such as autos and recreational vehicles, furniture, and heavy equipment sales, as well as construction contracting firms and auto repair firms have located in the commercial areas along Highway 99E. The City continues to attract inquiries from these types of firms interested in locating in Hubbard.

Economic constraints include the city's proximity to Woodburn, which has a large supply of vacant industrial land with better access to Interstate 5 and a large supply of commercial goods and services within a short drive of Hubbard. It is reasonable to expect that Woodburn will continue to serve as the large-scale commercial retail center for the surrounding area. Lower land costs relative to the region, will attract small and medium-sized businesses to Hubbard where an emphasis on reducing business costs is more important than direct access to Interstate 5.

### Local Employment Growth Projection

Based upon the economic outlook for the state and region, and the economic advantages to doing business in Hubbard, the city can expect to grow as fast as the region over the next 20 years. Rather than attempt to project the number of new jobs created as a percentage of the region, which is relatively small, this analysis uses the "Safe Harbor" method to determine employment needs as identified in Oregon Administrative Rules (OAR) 660-024-0040(8). The Safe Harbor method assumes the number of jobs created in the city will grow at a rate equal to the regional job growth rate provided in the most recent forecast published by the Oregon Employment Department (OED). The most recent forecast provided by the OED estimates the region's employment will grow by 15 percent from 2004 to 2014. This same growth rate was extrapolated throughout the 20 year planning horizon through the year 2027 to developed employment projections for Hubbard.

Covered employment includes only those workers covered under unemployment insurance. The data tends to underestimate total employment by excluding certain employees, such as business owners and some agricultural workers. Overall, covered employment accounts for only about 81 percent of all employment in Oregon. In **Table 4**, 2004 covered employment is converted to total employment using statewide conversion ratios. The percentage in each employment sector that is reported as part of covered employment is shown in the column titled "Covered Employment Percentage". Estimated total employment in Hubbard in 2004 was 2,073.

**Economics - Table 4  
Covered and Total Employment  
Hubbard, 2004**

Sector	Covered Employment Percentage	2004 Covered Employment	2004 Total Employment
Agriculture, Forestry, Fishing & Hunting	62%	443	715
Manufacturing	94%	386	411
Construction	73%	255	349
Wholesale Trade, Transportation, and Warehousing	87%	68	78
Retail Trade	84%	143	170
Real Estate and Services	74%	204	276
Public Sector (Local, State and Federal Employment)	100%	74	74
<b>Total</b>		<b>1,573</b>	<b>2,073</b>

Source: State of Oregon Employment Department sorted and summarized by MWVCOG, 2007.

**Table 5** shows the 2027 total employment projection for Hubbard. Total employment is projected to increase to 2,854 by 2027, an increase of 781 jobs. This represents an increase of 38 percent over 2004 total employment.



**Economics - Table 5  
Total Employment Projection  
Hubbard, 2027**

Sector	2004		2027	
	Percent	Total	Percent	Total
Agriculture, Forestry, Fishing & Hunting	34.5%	715	34.5%	985
Manufacturing	19.8%	411	19.8%	565
Construction	16.8%	349	16.8%	479
Wholesale Trade, Transportation, and Warehousing	3.8%	78	3.8%	108
Retail Trade	8.2%	170	8.2%	234
Real Estate and Services	13.3%	276	13.3%	380
Public Sector (Local, State and Federal Employment)	3.6%	74	3.6%	103
<b>Total</b>	<b>100.0%</b>	<b>2,073</b>	<b>100.0%</b>	<b>2,854</b>

Source: 2004 employment data provided by the State of Oregon Employment Department. 2004 data sorted and summarized by MWVCOG, 2007. Local employment projection for 2027 calculated by MWVCOG.

**Land Demand Analysis**

A primary function of the Economic Opportunities Analysis is to determine if sufficient land is available to accommodate projected employment over the planning horizon. In order to accomplish that, the employment growth forecasted above must be aggregated into general land use categories. Next, the number of new jobs created for commercial and industrial use must be converted into the number of acres needed for commercial and industrial uses over the 20 year planning horizon.

The employment sectors forecasted above were allocated into the following two (2) land use categories:

- Commercial: Retail Trade, Real Estate and Services.
- Industrial: Construction, Manufacturing; and Wholesale Trade, Transportation, Communications and Utilities.

This analysis assumes growth in the public sector employment will occur on existing public lands and that growth in agriculture, forestry and fishing industries will occur primarily on adjacent agricultural lands outside the urban area.

**Table 6** shows the 2027 total employment growth by land use type. **Table 6** indicates there will be an estimated 168 new commercial jobs and 314 new industrial jobs created, for a combined total of 482 new commercial and industrial jobs created by 2027.

**Economics -Table 6  
Total Employment Growth by Land Use Type  
Hubbard, 2004 to 2027**

Sector	Projected Employment Growth by 2027
<b>Commercial</b>	
Retail Trade	64
Real Estate and Services	104
<b>Total increase in commercial employment</b>	<b>168</b>
<b>Industrial</b>	
Manufacturing	154
Construction	130
Wholesale trade, transportation, and warehousing	30
<b>Total increase in industrial employment</b>	<b>314</b>

Source: MWVCOG, 2007.

To convert the employment growth shown in Table 6 above to the number of acres needed by land use type, the density of employment per acre must be estimated. One of the common methods used to determine the job density of an area is to calculate the number of employees per developed acre of land. Using employment data and the buildable lands analysis, estimates of commercial and industrial employment per acre in Hubbard were determined. For developed properties in the Industrial-Commercial (IC) Zone, which allows a broad mixture of industrial and commercial uses, Marion County Assessor data was used to determine whether developed properties were industrial or commercial uses. Based on this information, this analysis assumes 11.2 employees per acre for commercial uses and 15.2 employees per acre for industrial uses. The analysis is shown in Table 7.

**Economics -Table 7  
Employees Per Acre  
Hubbard**

Sector	Total Employment	Developed Acres	Employees Per Acre
Commercial	347	30.9 <sup>1</sup>	11.2
Industrial	810	53.3 <sup>2</sup>	15.2
<b>Total</b>			

Source: MWVCOG, 2007.

<sup>1</sup> Includes 11.8 acres zoned Commercial General (CG), 9.2 acres zoned Industrial-Commercial (IC), 5.9 acres zoned Residential-Commercial (RC), and 4.0 acres located within the UGB, zoned Commercial General (CG) by Marion County. Areas included from the Industrial-Commercial (IC), Residential-Commercial (RC), and Marion County Commercial General (CG) zones are developed with commercial uses.

<sup>2</sup> Includes 40.7 acres zoned Industrial (I) and 12.6 acres zoned Industrial-Commercial (IC). Areas included from the Industrial-Commercial (IC) Zone are developed with industrial uses.

Table 8 shows the amount of land needed to accommodate new commercial and industrial employment growth through 2027. Approximately 25.2 acres will be needed to accommodate projected commercial employment growth through this period. Approximately 20.1 acres will be needed to accommodate projected industrial employment growth through this period.

**Economics -Table 8  
Land Need by Land Use Type  
Hubbard 2027**

Sector	Total Employment Growth	Employees Per Acre	Total Demand (acres)
Commercial	168	11.2	15.0
Industrial	314	15.2	20.7
<b>Total</b>	<b>482</b>		<b>35.7</b>

Source: MWVCOG, 2007.

### COMMERCIAL AND INDUSTRIAL SITE REQUIREMENTS

An additional consideration is the type of sites needed for future commercial and industrial developments. Site requirements include the physical characteristics required for a particular type of industrial or commercial use to operate, such as parcel size, site configuration, and access to a specific type of transportation facility. Employment growth is forecasted for all of the major commercial and industrial sectors in Hubbard over the planning horizon; therefore, it is important that a variety of sites be available to meet the forecasted employment needs.

**Table 8** shows the size characteristics of developed commercial and industrial properties in Hubbard. Commercial uses in Hubbard have developed on properties that are between 5,000 square feet and three (3) acres in size. The average size of developed commercial properties in Hubbard is approximately 0.6 acres (26,390 square feet).

Developed industrial properties average about 1.2 acres in size. The current size of commercial and industrial parcels in Hubbard indicates the need for parcels between one half acre and two (2) acres in size.

**Economics –Table 8  
Size Characteristics of Developed Properties by Zone  
Hubbard 2007**

Zone	Average (acres)	Median (acres)	Parcel Size Range (acres)
Residential-Commercial (RC) <sup>1</sup>	0.2	0.2	0.09 – 0.7
Commercial General (CG)	0.8	0.4	0.3 – 3.0
Industrial-Commercial (IC) (commercial use)	1.2	1.0	0.4 – 2.5
Industrial-Commercial (IC) (industrial use)	1.4	1.0	0.2 – 4.4
Industrial (I)	1.0	0.7	0.1 – 3.2

Source: Marion County Assessor data, MWVCOG, 2007.

<sup>1</sup> Includes parcels in the RC Zone that are currently in commercial use.

As discussed under the economic opportunities and constraints section above, Hubbard is well positioned to see economic growth in small scale manufacturing industry. A discussion of the specific site requirements for these types of industries is provided as follows.

### Small Scale Manufacturing

Site characteristics for small-scale manufacturing include building sites with slopes less than 15 percent, on soils without severe building limitations. These businesses often locate on parcels between one (1) to three (3) acres in size that are preferably rectangular in shape with a lot depth of 200 to 300 feet. Small-scale manufacturers prefer direct access to a state highway or other well-travel transportation facility. Building configurations should allow for a variety of ancillary uses such as, show rooms and office space. These types of industries do not have as large of an impact as large-scale manufacturers and heavy industries, and thus do not require larger land use buffers of 50 to 100 feet. However, consideration should be given to provide some buffering between industrial and residential uses and avoiding truck traffic through residential areas.

### COMMERCIAL AND INDUSTRIAL LAND INVENTORY

In order to determine whether or not there is sufficient land available to meet projected employment over the planning horizon, an up-to-date inventory of the current land supply is needed. The following section identifies the supply of vacant and underutilized employment land within the Hubbard Urban Growth Boundary (UGB). **Table 9** shows a summary of the amount of vacant and redevelopable commercial and industrial land available within the Hubbard UGB. No physical site constraints, such as steep slopes, wetland, or floodways, were identified in the buildable lands analysis that would reduce the amount of land available for development.<sup>11</sup> Table 9 shows a total acreage of 25.5 acres of vacant and redevelopable commercial and industrial land is available in Hubbard.

**Economics - Table 9**  
**Commercial and Industrial Buildable Lands Inventory**  
**Hubbard, 2007**

Zone	Vacant Acres	Redevelopable Acres	Total Acres
Residential Commercial (RC)	0.5	0.0	0.5
Commercial General (CG)	5.1	0.3	5.4
Industrial-Commercial (IC)	6.9	0.0	6.9
Industrial (I)	12.1	0.6	12.7
<b>Total</b>	<b>24.6</b>	<b>0.9</b>	<b>25.5</b>

Source: Marion County Assessor data, MWVCOG, 2007.

**Table 10** shows the number of vacant and redevelopable commercial and industrial parcels by size. A number of small (less than 0.5 acre) commercial and industrial parcels are available for development. The size of available parcels is consistent with the inventory of developed parcels shown in Table 8. For the long-term, the City may wish to consider identifying one or more parcels that are at least three (3) acres in size and designating these for industrial use in order to provide a competitive market for such sites that is competitive with other cities.

<sup>11</sup> A one-acre parcel identified as Assessor Map 41W33DC, Tax Lot 100 is designated as Industrial in the Hubbard Comprehensive Plan. The property is located within the Hubbard UGB, but outside the city limits, and is currently zoned Urban Transition (UT) by Marion County. This property has limited potential for industrial use. It is currently developed with a single-family residence and is located behind existing industrial development on Highway 99E. The property does not have frontage on Highway 99E and the only vehicular access is via an access easement across an adjoining property.

**Economics -Table 10**  
**Commercial and Industrial Vacant Land Inventory by Parcel Size**  
**Hubbard, 2007**

Parcel Size	Number of Commercial Parcels	Number of Industrial Parcels <sup>1</sup>
0.0 - 0.5 acres	9	4
0.6 - 1.5 acres	1	3
1.5 - 3.0 acres	2	5
Larger than 3.0 acres	0	1
<b>Total</b>	<b>13</b>	<b>13</b>

Source: Marion County Assessor data, MWVCOG, 2007.

<sup>1</sup> Includes parcels zoned Industrial-Commercial

**Comparison of Land Demand and Supply**

Table 11 shows a comparison of land needed to accommodate new employment growth (demand) through 2027 and the available supply of vacant and redevelopable land. The comparison shows that there is not sufficient commercial or industrial land available within the Hubbard urban area to meet the projected land demand. Also, in the event that available vacant land zoned Industrial-Commercial is developed for commercial uses, which is a reasonable expectation given the location of these properties on Highway 99E, the deficit of available industrial-zoned land will be greater than is shown here.

**Economics - Table 11**  
**Comparison of Supply and Demand for Commercial and Industrial Land**  
**Hubbard, 2027**

Land Use Type	Vacant/Redevelopable Acres
<b>Supply</b>	
Commercial	6.9
Industrial <sup>1</sup>	19.6
<b>Total Supply</b>	<b>26.6</b>
<b>Demand</b>	
Commercial	15.0
Industrial	20.7
<b>Total Demand</b>	<b>35.7</b>
<b>Surplus (Deficit)</b>	
Commercial	(8.1)
Industrial	(1.1)
<b>Total</b>	<b>(9.1)</b>
<b>Additional land needed for public uses - streets, parks, etc. (25% of 20-year land needs)</b>	<b>2.3</b>
<b>Total Commercial and Industrial Land Needs</b>	<b>11.4</b>

Source: MWVCOG, 2007.

<sup>1</sup> Includes parcels zoned Industrial-Commercial

### Short-Term (5 Year) Land Needs

Table 12 identifies short-term land needs for the City of Hubbard. Short-term land needs are characterized by those lands that will be needed for employment growth within the next five (5) years. Ideally, land available for short-term employment growth is not constrained by the lack of infrastructure or those lands considered unavailable due to land speculation. The five-year demand is approximated as one quarter of the projected 20-year demand. Based upon a review of the buildable lands inventory, the city has adequate commercial and industrial land to meet its short-term land needs. Hubbard's short term supply of vacant commercial and industrial lands is not currently constrained by immediate public improvements or natural resource constraints.

**Economics - Table 12**  
**Short-Term Demand for Commercial and Industrial Land**  
**Hubbard**

Land Use Type	Vacant/Redevelopable Acres
Commercial	3.8
Industrial	5.2
<b>Total Demand</b>	<b>9.0</b>

Source: MWVCOG, 2007.

### Long-Term Land Needs

As shown in Table 11, the city does not have enough land available to meet the projected need for commercial and industrial land through 2027. Oregon Administrative Rules 660-009-0025 requires that, as part of an Economic Opportunities Analysis, the city must designate enough land to meet the total projected land needs for each industrial or other employment use category identified in the plan during the 20-year planning period.

The City has identified an area for inclusion in the Urban Growth Boundary that would meet the projected need for commercial and industrial land. The area is comprised of four (4) vacant parcels located south of the existing UGB and west of Pacific Highway 99E that comprise approximately 11.7 acres. The properties range in size from 1.7 acres to 4.7 acres. These properties are located on either side of Schmidt Lane, a public road right-of-way that serves properties on both sides of Pacific Highway 99E.

The proposed expansion area also includes two (2) parcels approximately five (5) acres in size that are referenced as Marion County Assessor Map Number 41W33DC, tax lots 1000 and 1100. These parcels are currently developed with an automobile sales and RV/boat storage facility and are not considered redevelopable because the value of improvements on the parcels exceeds \$5,000 and the ratio of the land value to the improvement value is greater than 1:1. While these parcels do not contribute to the city's overall long term commercial and industrial land needs, including them inside the UGB allows the parcels to access city services such as, water and sewer service, thereby promoting a more efficient provision of public facilities and services to urban uses.

The properties to be included in the UGB are shown in Table 13 below.

**Economics - Table 13  
Proposed Urban Growth Boundary Area for  
Commercial and Industrial Use  
Hubbard**

Assessor Map/Tax Lot	Parcel Size (acres)
41W33DC/400	2.5
41W33DC/500	1.7
41W33DC/800	2.8
41W33DC/900	4.7
41W33DC/1000	0.9
41W33DC/1100	4.0
Highway 99E right-of-way	2.0
Schmidt Lane right-of-way	0.6

Source: MWVCOG, 2008

The vacant properties meet the size requirements for both commercial and industrial uses, and can be partitioned or subdivided to make smaller parcels as needed. Schmidt Lane would provide the sole access to the parcels with development potential thus limiting access conflicts on Pacific Highway 99E. Upon annexation and development, Schmidt Lane would be constructed to City street standards. The area to be included in the UGB would be designated as Industrial in the Comprehensive Plan and upon annexation would be zoned Industrial-Commercial. This zoning would provide for the full range of commercial and industrial uses permitted in Hubbard and would provide the greatest flexibility in meeting projected land needs through 2027.

**Key Findings and Future Planning Implications**

Overall, the economy in Region 3, comprised of Marion, Polk, and Yamhill Counties, is expected to experience modest economic growth over the next 20 years. Hubbard should be able to capitalize on that growth. Hubbard has some comparative advantages related to the availability of suitable commercial and industrial sites that have public services readily available, and transportation access to Highway 99E. While direct access to Interstate 5 is not available in Hubbard, Highway 99E connects with Interstate 5 approximately four (4) miles north of Hubbard. The city is located between major markets in Salem and Portland.

Total employment in Hubbard is projected to reach 2,854 persons by 2027, an increase of about 38 percent over 2004 total employment. Manufacturing, construction, and real estate and services sectors will experience the largest employment growth over the 20-year planning period.

The city's buildable lands inventory shows there will be a deficit of vacant or redevelopable commercial and industrial land available to meet the projected need through the year 2027. All vacant and redevelopable properties have services readily available. The type and size of available commercial and industrial sites is typical of sites that have been previously developed. The city will need to expand the UGB to include more land for commercial and industrial development to meet the 2027 projected demand. A 19 acre area located south of the existing UGB has been identified as the area for commercial and industrial development.

## Economic Development Goals and Policies

**Goal:** To provide for and maintain a viable and diverse economy while preserving the present sense of community and high level of environmental quality.

**Policies:**

1. The City of Hubbard shall encourage a wide variety of commercial activities in convenient and desirable locations to serve city residents.
2. The City of Hubbard encourages the continuation of business within the City limits along the Highway 99E corridor.
3. The City of Hubbard wishes to develop and maintain a central business area to serve the needs of the resident and the visitor. A specific area between Highway 99E and the railroad right-of-way will be designated for a mixture of commercial and secondary residential uses to provide housing and services within close proximity of each other.
4. To achieve a commercial and industrial development pattern that is balanced with a moderate rate of overall economic growth, the City of Hubbard encourages the location of businesses within the community that create wages able to support a family.
5. Commercial and industrial establishments should contribute to and not detract from the beauty of the community.
6. The City of Hubbard supports the industrial park concept for the area on the southeast end of town to attract larger industrial based businesses to the community.
7. The City of Hubbard shall encourage the development of economic activities that will provide jobs able to utilize the skills of the local labor force.
8. The City of Hubbard will encourage economic development planning and programming activities that serve to stimulate private sector development.
9. The City of Hubbard shall cooperate with relevant federal, state, regional, and local government agencies in economic development planning for the area.
10. The City of Hubbard will support projects and development in commercial areas consistent with the City's adopted 2003 Resource Team Report for Hubbard Oregon prepared by the Oregon Downtown Development Association.
11. Consistent with Marion County Framework Plan policies, the City of Hubbard has conducted an Economic Opportunities Analysis (EOA) consistent with the Goal 9 Rule (OAR Chapter 660, Division 9) that:
  - (a) Describes state and regional economic trends;
  - (b) Inventories lands suitable for employment use by parcel size;
  - (c) Assesses community economic development potential;
  - (d) Forecasts future employment; and



- (e) Estimates the amount of land needed in Commercial and Industrial plan designations to accommodate future employment;
12. The City's policy is to accommodate industrial and commercial growth consistent with the 2007Hubbard Economic Opportunities Analysis (EOA).
  13. The City of Hubbard will continue to work with Marion County, economic development agencies, area economic development groups, and major institutions to provide information to support development of a region-wide strategy promoting a sustainable economy.

## Marion County Coordination Section

In 2003, Marion County adopted the "Urban Growth Management Framework" as part of its comprehensive plan. The Framework states its purpose on pages 2-3:

*"The purpose of the Growth Management Framework is to:*

- 1. Identify common goals, principles, and tools that will lead to more coordinated planning and promote a collaborative approach to developing solutions to growth issues.*
- 2. Be consistent with City plans for growth by modifying the growth projections in response to City feedback.*
- 3. Protect farm, forest, and resource lands throughout the County by considering the existing growth capacity of each community, fostering the efficient use of land, and evaluating urban growth boundary expansion needs.*
- 4. Maintain physical separation of communities by limiting urbanization of farm and forest lands between cities.*
- 5. Maintain community identity by encouraging each community to decide how it should grow and by promoting City decision-making control.*
- 6. Support a balance of jobs and housing opportunities for communities and areas throughout the county that contribute to the needs of regional and City economies.*
- 7. Provide transportation corridors and options that connect and improve accessibility and mobility for residents along with the movement of goods and services throughout the county.*

*The Urban Growth Management Framework is a coordination planning strategy that provides a guide cities may follow when considering urban expansion needs and decisions in response to growth issues. The Framework identifies the areas of interest for the County regarding urbanization and possible measures in the form of coordination guidelines, that cities may choose to pursue to accommodate efficient growth. Within the context of the Framework, coordination guidelines are defined as being flexible directions or measures that may be utilized to address specific policy statements.*

*"The Framework is intended to provide direction and assistance for the cities through a checklist of factors for consideration in making decisions regarding the impacts of growth. The decision as to how to use the Framework and which guidelines may be important and applicable, is up to the cities. The County recognizes there may be several ways to approach and resolve an issue and the Framework provides flexibility for the cities in coordinating planning efforts with the County."*

### Marion County Coordination Goals and Policies

**GOAL:** To coordinate with Marion County regarding planning issues that extend beyond the boundaries of the City of Hubbard, including population allocations, amendments to acknowledged comprehensive plans and transportation system plans, and achievement of a compact urban growth form, as required by Statewide Planning Goals 2 (Land Use Planning and Coordination), 12 (Transportation) and 14 (Urbanization.)

**POLICIES:**

1. Marion County Framework Plan goals, policies, and guidelines will be considered when the City considers Comprehensive Plan amendments that require Marion County concurrence.
2. The City of Hubbard shall have primary responsibility to plan for community growth within its Urban Growth Boundary, and recognizes its responsibility to coordinate with Marion County to ensure the efficient use of urbanizable land within the Hubbard UGB.

**Marion County Economic Coordination Goals and Policies**

Consistent with Marion County's Urban Growth Management Framework, the City of Hubbard adopts the following economic coordination goal and associated policies.

**GOAL:** Encourage diversity and balance of job types (e.g., service and industry jobs); promote economic opportunity for all segments of society; encourage a sustainable local and regional economy; and tailor economic development to the unique assets and needs of the county and the City of Hubbard.

**POLICIES:**

1. Consistent with Marion County Framework Plan policies, the City of Hubbard has conducted an Economic Opportunities Analysis (EOA) consistent with the Goal 9 Rule (OAR Chapter 660, Division 9) that
  - (a) Describes state and regional economic trends;
  - (b) Inventories lands suitable for employment use by parcel size;
  - (c) Assesses community economic development potential;
  - (d) Forecasts future employment; and
  - (e) Estimates the amount of land needed in Commercial and Industrial plan designations to accommodate future employment;
2. The City of Hubbard will work with Marion County, economic development agencies, area economic development groups, and major institutions to provide information to support development of a region-wide strategy promoting a sustainable economy.

## HUBBARD URBAN GROWTH BOUNDARY EXPANSION FINDINGS

The City of Hubbard is proposing an expansion of the city's Urban Growth Boundary (UGB). The City recently conducted an Economic Opportunities Analysis (EOA) as described in Oregon Administrative Rules (OAR) 660, Division 9. The EOA projected local employment through 2027. The results of that analysis showed that Hubbard would have a deficit of approximately 11.4 acres of commercial and industrial land necessary to meet projected employment needs. Based on that analysis, the City proposes an additional 11.7-acre UGB expansion for future commercial and industrial development. **Table 1** shows the properties included in the proposed expansion. The total area of the proposed expansion also includes existing right-of-way and developed industrial/commercial land and is approximately 19 acres in size.

**UGB Findings Table 1  
Properties Included in UGB Expansion**

Map Number/ Tax Lot	Size	Buildable Lands Status	Location
041W33DC/400	2.5 acres	vacant	South of the existing UGB
041W33DC/500	1.7 acres	vacant	South of the existing UGB
041W33DC/800	2.8 acres	vacant	South of the existing UGB
041W33DC/900	4.7 acres	vacant	South of the existing UGB
041W33DC/1000	0.9 acres	developed	South of the existing UGB
041W33DC/1100	4.0 acres	developed	South of the existing UGB
Highway 99E right-of-way	2.0 acres	road	East of the existing UGB
Schmidt Lane right-of-way	0.6 acres	road	South of the existing UGB
Total	19 acres		

Source: Marion County Assessor data and MWVCOG 2008.

**Table 2** shows current Marion County Comprehensive Plan designations for the properties included in the UGB expansion. The table also shows the proposed Hubbard Comprehensive Plan designations and zoning that would be applied to these properties upon annexation into the city.

**UGB Findings Table 2  
Current and Proposed Comprehensive Plan Designations Zoning  
for Properties Included in UGB Expansion**

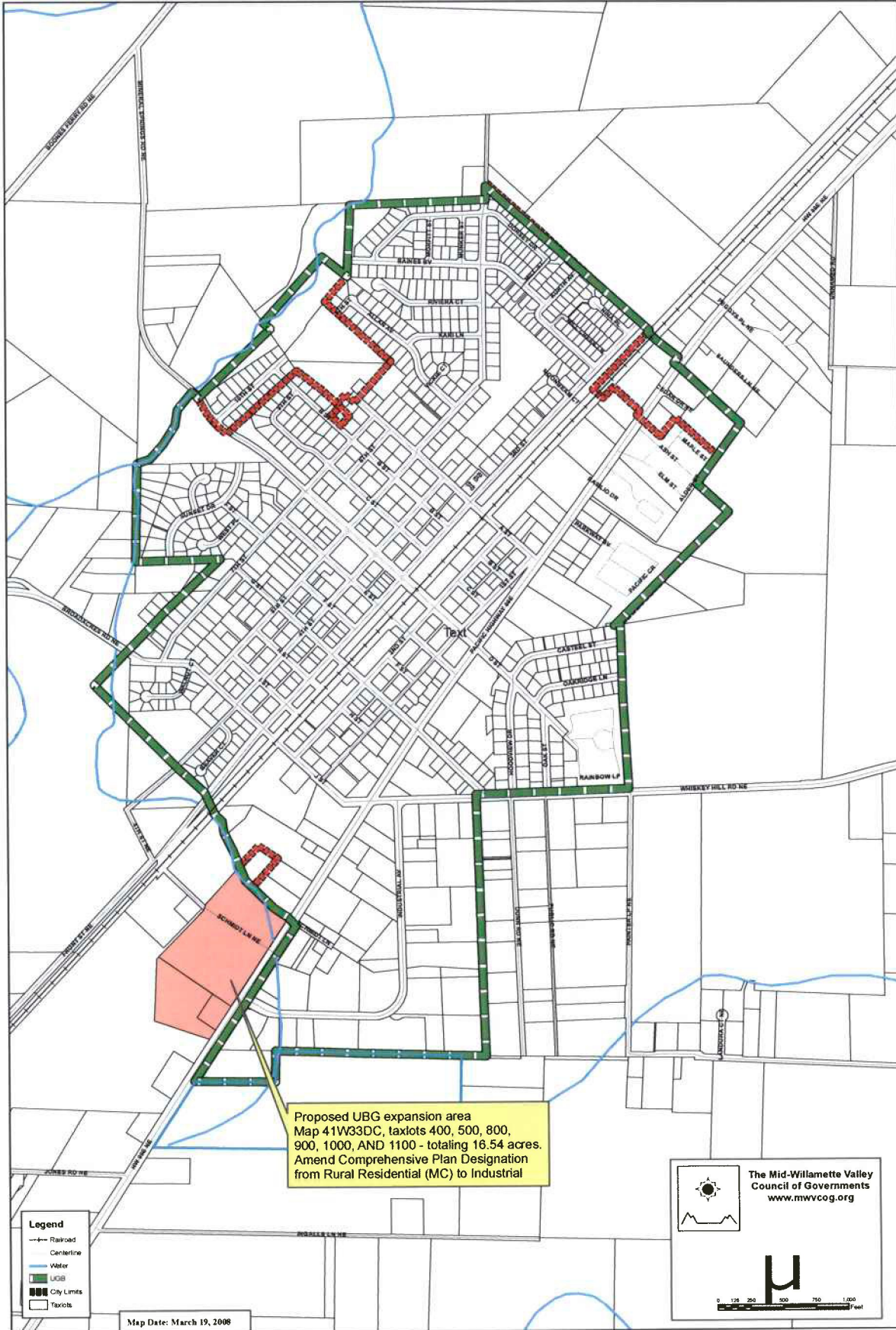
Map Number/ Tax Lot	Current Comprehensive Plan Designation	Current Zoning	Proposed Comprehensive Plan Designation	Proposed Zoning Upon Annexation
041W33DC/400	Rural Residential	Acreage Residential	Industrial	Industrial Commercial (IC)
041W33DC/500	Rural Residential	Acreage Residential	Industrial	Industrial Commercial (IC)
041W33DC/800	Rural Residential	Acreage Residential	Industrial	Industrial Commercial (IC)
041W33DC/900	Rural Residential	Acreage Residential	Industrial	Industrial Commercial (IC)
041W33DC/1000	Commercial	Commercial	Industrial	Industrial Commercial (IC)
041W33DC/1100	Commercial	Commercial	Industrial	Industrial Commercial (IC)

Source: Marion County Assessor data and MWVCOG 2008

**Figure 1** shows the proposed UGB expansion areas.

**Figure 1**  
**Proposed Hubbard UGB Expansion**

# Hubbard Urban Growth Boundary Expansion



Proposed UBG expansion area  
 Map 41W33DC, taxlots 400, 500, 800,  
 900, 1000, AND 1100 - totaling 16.54 acres.  
 Amend Comprehensive Plan Designation  
 from Rural Residential (MC) to Industrial

- Legend**
- +— Railroad
  - Centerline
  - Vebler
  - UGB
  - City Limits
  - Taxlots

Map Date: March 19, 2008

The Mid-Willamette Valley  
 Council of Governments  
[www.mwvcog.org](http://www.mwvcog.org)

0 125 250 500 750 1,000 Feet

## Analysis of Land Needs

### Economic Opportunities Analysis

Statewide Planning Goal 9 (Economic Development) requires cities to provide an adequate supply of suitable sites for a variety of industrial and other employment uses. The Hubbard Comprehensive Plan includes an Economic Opportunity Analysis (EOA) to fulfill the Goal 9 requirements and ensure an adequate supply of land is available for new and expanding businesses in Hubbard over the 20 year planning horizon.

The employment growth analysis uses the "Safe Harbor" method to determine employment needs as identified in Oregon Administrative Rules (OAR) 660-024-0040(8). The Safe Harbor method assumes the number of jobs created in the city will grow at a rate equal to the regional job growth rate provided in the most recent forecast published by the Oregon Employment Department (OED). The most recent forecast provided by the OED estimates the region's employment will grow by 15 percent from 2004 to 2014. This same growth rate was extrapolated throughout the 20 year planning horizon through the year 2027 to develop employment projections for Hubbard.

**Table 3** shows covered employment data for the Hubbard area for 2004 based on employer records with a 97032 zip code. Much of the employment for Hubbard residents is in the non-manufacturing sector.

**UGB Findings Table 3  
Hubbard Covered Employment, 2004**

Industry	Number of Jobs	Percent of Total
Agriculture, Forestry, Fishing & Hunting (11*)	443	28.2%
Manufacturing (31)	386	24.5%
Construction (23)	255	16.2%
Wholesale Trade (42), Transportation and Warehousing (48)	68	4.3%
Retail Trade (44)	143	9.1%
Real Estate (53) and Services (54, 55, 56, 62, 71, 72, 81, 99)	204	13.0%
Public Sector (Local, State and Federal Employment)	74	4.7%
<b>Total</b>	<b>1573</b>	<b>100.0%</b>

Source: State of Oregon Employment Department sorted and summarized by MWVCOG, 2007.

\* Two-digit North American Industry Classification System (NAICS) code.

Covered employment includes only those workers covered under unemployment insurance. The data tends to underestimate total employment by excluding certain employees, such as business owners and some agricultural workers. Overall, covered employment accounts for only about 81 percent of all employment in Oregon. In **Table 4**, 2004 covered employment is converted to total employment using statewide conversion ratios. The percentage in each employment sector that is reported as part of covered employment is shown in the column titled "Covered Employment Percentage". Estimated total employment in Hubbard in 2004 was 2,073.

**UGB Findings Table 4  
Covered and Total Employment  
Hubbard, 2004**

Sector	Covered Employment Percentage	2004 Covered Employment	2004 Total Employment
Agriculture, Forestry, Fishing & Hunting	62%	443	715
Manufacturing	94%	386	411
Construction	73%	255	349
Wholesale Trade, Transportation, and Warehousing	87%	68	78
Retail Trade	84%	143	170
Real Estate and Services	74%	204	276
Public Sector (Local, State and Federal Employment)	100%	74	74
<b>Total</b>		<b>1,573</b>	<b>2,073</b>

Source: State of Oregon Employment Department sorted and summarized by MWVCOG, 2007.

Table 5 shows the 2027 total employment projection for Hubbard. Total employment is projected to increase to 2,854 by 2027, an increase of 781 jobs. This represents an increase of 38 percent over 2004 total employment.

**UGB Findings Table 5  
Total Employment Projection  
Hubbard, 2027**

Sector	2004		2027	
	Percent	Total	Percent	Total
Agriculture, Forestry, Fishing & Hunting	34.5%	715	34.5%	985
Manufacturing	19.8%	411	19.8%	565
Construction	16.8%	349	16.8%	479
Wholesale Trade, Transportation, and Warehousing	3.8%	78	3.8%	108
Retail Trade	8.2%	170	8.2%	234
Real Estate and Services	13.3%	276	13.3%	380
Public Sector (Local, State and Federal Employment)	3.6%	74	3.6%	103
<b>Total</b>	<b>100.0%</b>	<b>2,073</b>	<b>100.0%</b>	<b>2,854</b>

Source: 2004 employment data provided by the State of Oregon Employment Department. 2004 data sorted and summarized by MWVCOG, 2007. Local employment projection for 2027 calculated by MWVCOG.

**Land Demand Analysis**

A primary function of the Economic Opportunities Analysis is to determine if sufficient land is available to accommodate projected employment over the planning horizon. In order to accomplish that, the employment growth forecasted above must be aggregated into general land use categories. The number of new jobs created for commercial and industrial use must be converted into the number of acres needed for commercial and industrial uses over the 20 year planning horizon.



The employment sectors forecasted above were allocated into the following two (2) land use categories:

- Commercial: Retail Trade; Real Estate and Services.
- Industrial: Construction; Manufacturing; and Wholesale Trade, Transportation, Communications and Utilities.

This analysis assumes growth in the public sector employment will occur on existing public lands and that growth in agriculture, forestry and fishing industries will occur primarily on adjacent agricultural lands outside the urban area.

**Table 6** shows the 2027 total employment growth by land use type. **Table 6** indicates there will be an estimated 168 new commercial jobs and 314 new industrial jobs created, for a combined 482 new commercial and industrial jobs created by 2027.

**UGB Findings Table 6  
Total Employment Growth by Land Use Type  
Hubbard, 2004 to 2027**

Sector	Projected Employment Growth by 2027
<b>Commercial</b>	
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Manufacturing	154
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Wholesale trade, transportation, and warehousing	30
<b>Total increase in industrial employment</b>	<b>314</b>

Source: MWVCOG, 2007.

To convert the employment growth shown in Table 6 above to the number of acres needed by land use type, the density of employment per acre must be estimated. One of the common methods used to determine the job density of an area is to calculate the number of employees per developed acre of land. Using employment data and the buildable lands analysis, estimates of commercial and industrial employment per acre in Hubbard were determined. For developed properties in the Industrial-Commercial (IC) Zone, which allows a broad mixture of industrial and commercial uses, Marion County Assessor data was used to determine whether developed properties were industrial or commercial uses. Based on this information, this analysis assumes 11.2 employees per acre for commercial uses and 15.2 employees per acre for industrial uses. The analysis is shown in **Table 7**.

**UGB Findings Table 7  
Employees Per Acre  
Hubbard**

Sector	Total Employment	Developed Acres	Employees Per Acre
Commercial	347	30.9 <sup>1</sup>	11.2
Industrial	810	53.3 <sup>2</sup>	15.2
<b>Total</b>			

Source: MWVCOG, 2007

<sup>1</sup> Includes 11.8 acres zoned Commercial General (CG), 9.2 acres zoned Industrial-Commercial (IC), 5.9 acres zoned Residential-Commercial (RC), and 4.0 acres located within the UGB, zoned Commercial General (CG) by Marion County. Areas included from the Industrial-Commercial (IC), Residential-Commercial (RC), and Marion County Commercial General (CG) zones are developed with commercial uses.

<sup>2</sup> Includes 40.7 acres zoned Industrial (I) and 12.6 acres zoned Industrial-Commercial (IC). Areas included from the Industrial-Commercial (IC) Zone are developed with industrial uses.

Table 8 shows the amount of land needed to accommodate new commercial and industrial employment growth through 2027. Approximately 25.2 acres will be needed to accommodate projected commercial employment growth through this period. Approximately 20.1 acres will be needed to accommodate projected industrial employment growth through this period.

**UGB Findings Table 8  
Land Need by Land Use Type  
Hubbard 2027**

Sector	Total Employment Growth	Employees Per Acre	Total Demand (acres)
Commercial	168	11.2	15.0
Industrial	314	15.2	20.7
<b>Total</b>	<b>482</b>		<b>35.7</b>

Source: MWVCOG, 2007

**BUILDABLE LANDS INVENTORY**

As part of Legislative Amendment 07-02, a buildable lands inventory was conducted. The buildable lands inventory is used in conjunction with the EOA to determine if adequate land is available for future commercial and industrial development.

For each land type (commercial and industrial), the analysis was broken into two parts. First, the findings describe the amount of net buildable land, by zoning district, within the existing city limits. The analysis also includes any buildable land located between the city limits and UGB. Land in this area is zoned by the County until it is annexed into the city. The City's Comprehensive Plan does designate, in general, the future use (commercial or industrial) for such properties.

The analysis of commercial and industrial lands includes totals for land that is completely vacant and redevelopable.

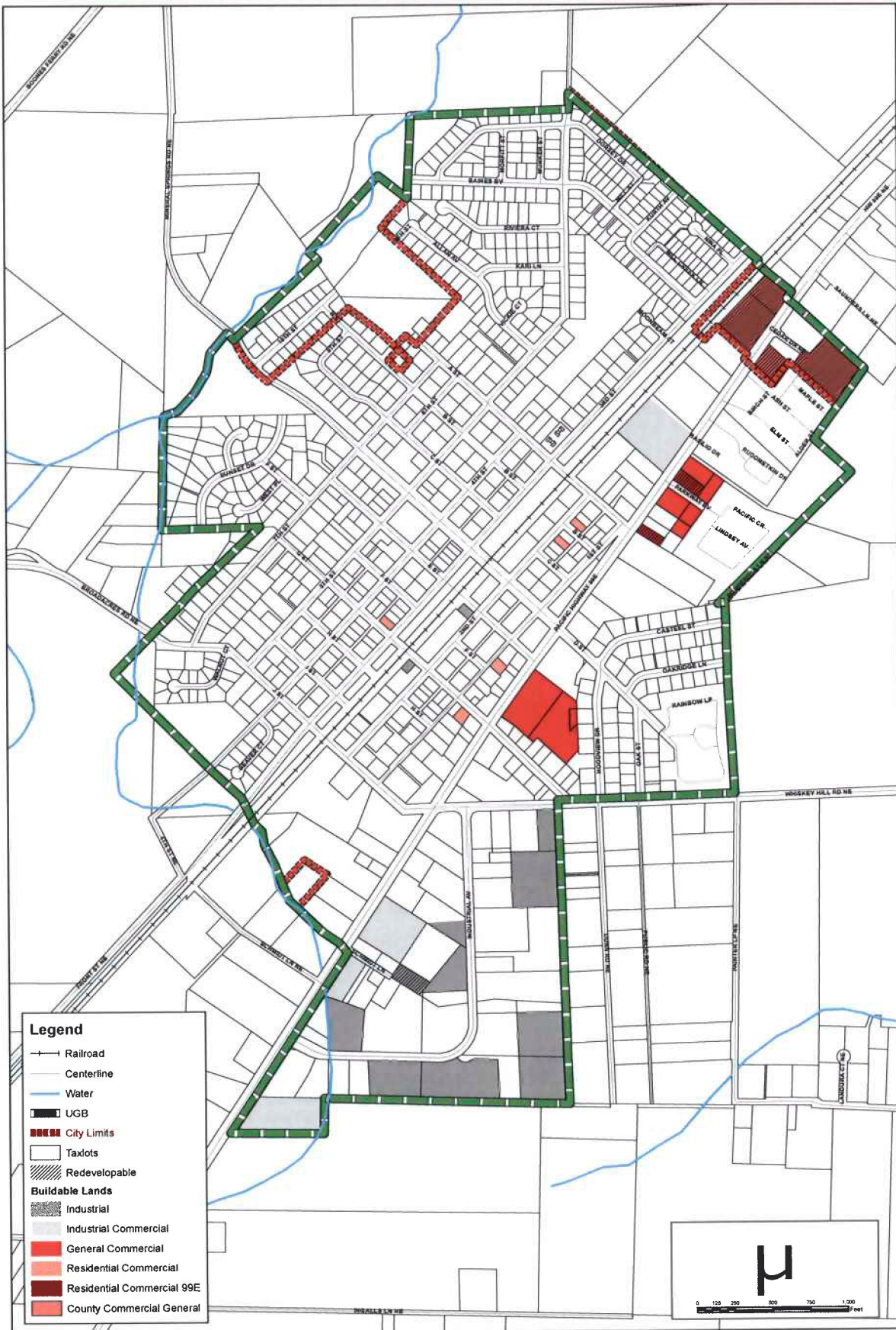
The following parameters are used to determine whether land is vacant or redevelopable.

- Vacant commercial or industrial land includes all parcels with improvement values of less than \$5,000
- Redevelopable commercial and industrial land includes parcels in commercial and industrial zones where some limited improvements have been made, but where potential for redevelopment for more intense uses is probable. For the purpose of this analysis, redevelopable land is defined as commercial or industrial parcels with improvement values of at least \$5,000, where the ratio of land value to improvement value is 1:1 or greater.

The analysis also includes an assessment of land that is not buildable due to physical constraints such as steep slopes, riparian buffers, floodways, and wetlands. These areas have been subtracted from the amount of gross acreage that is considered buildable. **Figure 2** shows vacant and redevelopable commercial and industrial land within the Hubbard urban area by zoning designation.

**Figure 2**  
**Hubbard Commercial and Industrial**  
**Buildable Lands**

# Hubbard Commercial and Industrial Buildable Lands Inventory 2007



*Commercial Land*

**Table 9** shows that approximately 5.1 net vacant acres are available for commercial development within the Hubbard city limits. Approximately 0.3 acre designated for commercial use can be considered redevelopable. No vacant commercial land is located between the city limits and urban growth boundary. Approximately 11.8 acres within the Hubbard UGB are currently developed for commercial uses.

**UGB Findings Table 9  
Buildable Commercial Land<sup>1</sup>  
Hubbard, 2007**

Zone/Plan Designation	Vacant (acres)	Redevelopable	Total
<b>Within City Limits</b>			
Commercial District (CG)	5.1	0.0	5.1
<b>Buildable Acres within the Urban Area</b>	<b>5.1</b>	<b>0.0</b>	<b>5.1</b>

Source: Marion County Assessor data, MWVCOG, 2007.

<sup>1</sup> The Residential Commercial Zone allows some limited commercial uses. The vacant land in this zone is shown in Table 2 - Buildable Residential Land. Similarly, the Industrial Commercial Zone allows commercial uses. The vacant land in this zone is shown in Table 4 - Buildable Industrial Land.

*Industrial Land*

**Table 10** shows the amount of buildable land for each industrial zoning district within the Hubbard city limits. Approximately 19.0 acres of vacant industrial land are located within the Hubbard city limits. An additional 0.6 acre of industrial land is considered redevelopable. No vacant industrial land is located between the city limits and urban growth boundary. Approximately 62.6 acres within the Hubbard UGB are currently developed for industrial uses.

**UGB Findings Table 10  
Buildable Industrial Land  
Hubbard, 2007**

Zone/Plan Designation	Vacant (acres)	Redevelopable	Total
<b>Within City Limits</b>			
Industrial District (I)	12.1	0.6	12.7
Industrial Commercial District (IC) <sup>1</sup>	6.9	0.0	6.9
<b>Buildable Acres Within the Urban Area</b>	<b>19.0</b>	<b>0.6</b>	<b>19.6</b>

Source: Marion County Assessor data, MWVCOG, 2007.

<sup>1</sup> The Industrial Commercial District also allows a number of commercial uses.

## LANDS NEEDS ANALYSIS

### *Future Commercial and Industrial Land Needs*

The Economics Element of the Comprehensive Plan includes a 2027 local employment projection. One purpose for local employment projection is to determine if sufficient land is currently designated in the Comprehensive Plan to accommodate projected commercial and industrial development. **Table 11** shows a comparison of available commercial and industrial land and the amount of land needed to meet projected employment in Hubbard through 2027. The analysis shows that Hubbard does not have enough land to meet the projected need for commercial and industrial land through 2027. A total of 11.4 acres are needed to meet projected employment in Hubbard through 2027.

**UGB Findings Table 11**  
**Comparison of Supply and Demand for Commercial and Industrial Land**  
**Hubbard, 2027**

Land Use Type	Vacant/Redevelopable Acres
<b>Supply</b>	
Commercial	6.9
Industrial <sup>1</sup>	19.6
Total Supply	<b>26.6</b>
<b>Demand</b>	
Commercial	15.0
Industrial	20.7
Total Demand	<b>35.7</b>
<b>Surplus (Deficit)</b>	
Commercial	(8.1)
Industrial	(1.1)
Total	<b>(9.1)</b>
<b>Additional land needed for public uses - streets, parks, etc. (25% of 20-year land needs)</b>	<b>2.3</b>
<b>Total Commercial and Industrial Land Needs</b>	<b>11.4</b>

Source: MWVCOG, 2007.

<sup>1</sup> Includes parcels zoned Industrial-Commercial

### **Alternatives Area Analysis**

Oregon Revised Statutes (ORS) 197.298 describes a priority system to be used when considering land for inclusion within an urban growth boundary. Seven study areas were analyzed for possible inclusion in the Hubbard UGB.

**Figure 3** shows the seven (7) study areas included in the UGB analysis. Descriptions of the study areas as well as their relative advantages and constraints for future urban use are described in the findings related to the ORS 197.298 below. County Assessor maps, which are referenced in this report are included as Exhibit D.

**Figure 3**  
**Hubbard UGB Analysis Study Areas**



*ORS 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.*

**Findings:** The Hubbard Comprehensive Plan does not designate any land as urban reserve land.

*(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.*

**Findings:** Three (3) of the seven (7) study areas consist of existing exception areas or nonresource lands. These are considered by ORS 197.298 (b) as the top priority lands for inclusion within urban growth boundaries. A description of the three (3) exception areas is provided as follows.

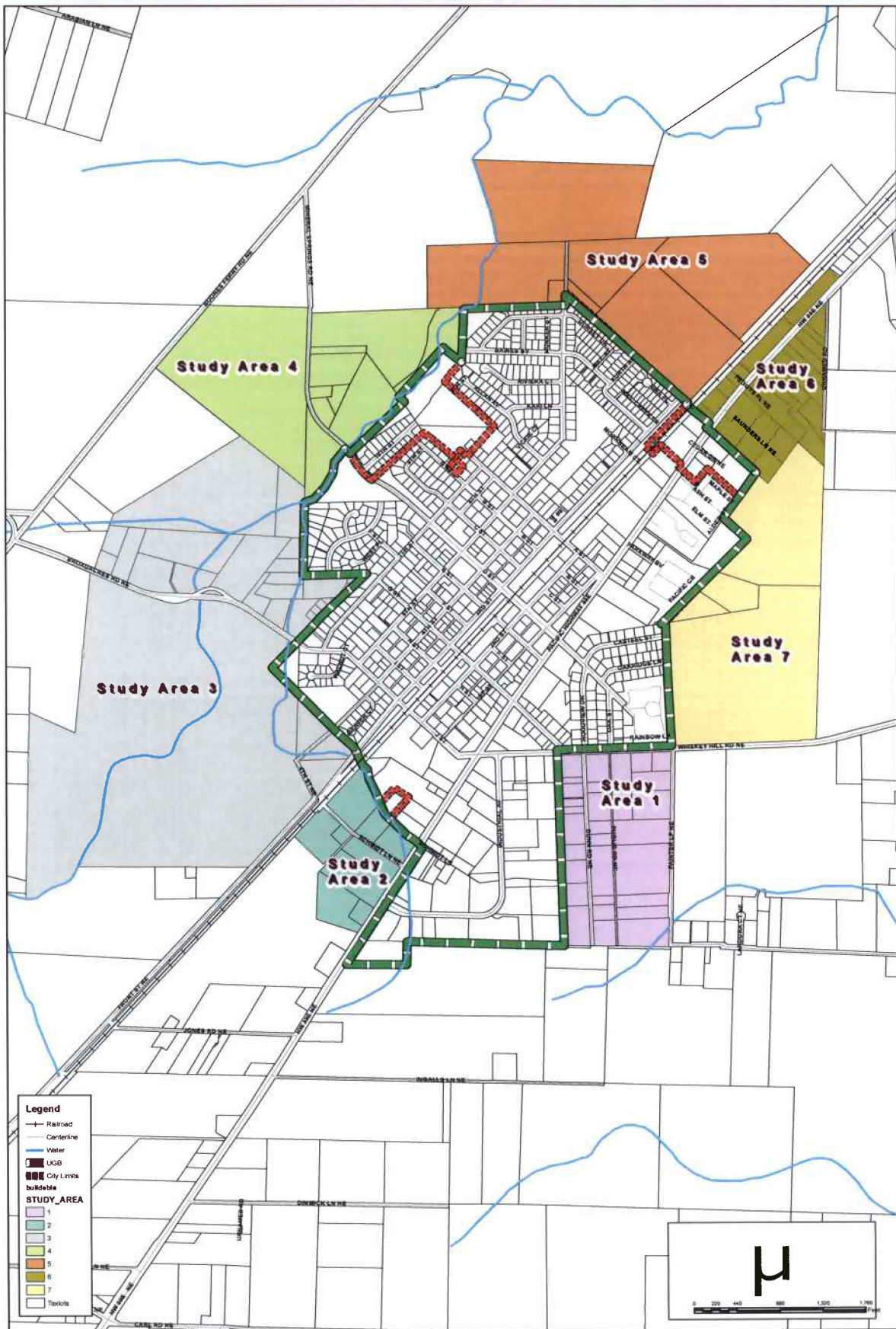
**Study Area 1:** Study Area 1 is approximately 49.3 acres in size and is located on the south side of Whiskey Hill Road east of Highway 99E. The area is zoned Acreage Residential (AR) by Marion County. Properties in this area range in size from 0.3 acres to 65.5 acres in size. All but two of the properties (Assessor Map 41W34CC, Tax Lot 301 and Assessor Map 41W34CC, Tax Lot 600) are developed with single-family residences (including manufactured homes). The properties included in Study Area 1 are shown in **Table 13**.

Properties in the western portion of the Study Area are located on Dunn Road NE. Properties in the eastern portion of the Study Area are located on Painter Loop NE. Both of these roads extend north and south, connecting with Whiskey Hill Road on the north. Whiskey Hill Road is the northern terminus point for both roads. The southern terminus of Dunn Road NE is located at the south end of the Study Area. Painter Loop turns at a 90-degree angle and continues east at the southern end of the Study Area. Both roads are part of the Marion County road system. The area is also bisected by a 20-foot wide platted alley that extends north and south approximately 200 feet east of Dunn Road NE. The alley is undeveloped and development in the area has encroached on the alley right-of-way.

Dunn Road NE has a 40-foot wide right-of-way. Approximately 100 feet of Dunn Road extending south from the intersection with Whiskey Hill Road is paved. The remainder of the road is graveled. No sidewalks are present on Dunn Road NE.

Painter Loop Road NE has a 40-foot wide right-of-way, except for an approximately 250 foot section with a 50-foot wide right-of-way located adjacent to tax lots 300 and 301 (Assessor Map 41W34CC), which has a 50-foot wide right-of-way. County Assessor maps show that these parcels were partitioned in 1996 (Partition Plat 1996-87). The additional right-of-way along the property frontage indicates a required 10-foot wide dedication required as part of that partition. No sidewalks are present on the portion of Painter Loop NE located within the Study Area.

# Hubbard Urban Growth Boundary Analysis



**UGB Findings Table 13**  
**Study Area 1 – Area east of the existing UGB on the south side of Whiskey Hill Road**  
**Assessor Map 41W34CB and Assessor Map 41W34CC**

Map & Tax Lot	Size (acres)	Development/Redevelopment Potential
41W34CB 3800	1.2	Zoned Acreage Residential (AR), single-family residence
41W34CB 3900	0.3	Zoned AR, accessory structures
41W34CB 4000	0.7	Zoned AR, single-family residence
41W34CB 4100	0.5	Zoned AR, single-family residence
41W34CB 4200	0.4	Zoned AR, vacant
41W34CB 4300	3.2	Zoned AR, single-family residence, accessory structures
41W34CB 4400	0.7	Zoned AR, two manufactured homes, accessory structure
41W34CB 4500	2.0	Zoned AR, manufactured home, accessory structure
41W34CB 4600	2.0	Zoned AR, single-family residence, accessory structures
41W34CB 4700	1.1	Zoned AR, manufactured home, accessory structure
41W34CB 4800	1.1	Zoned AR, two manufactured homes, accessory structure
41W34CB 4900	1.7	Zoned AR, manufactured home, accessory structure
41W34CB 5000	2.6	Zoned AR, single-family residence, accessory structures
41W34CC 100	3.6	Zoned AR, single-family residence
41W34CC 200	6.5	Zoned AR, single-family residence, accessory structures
41W34CC 300	1.5	Zoned AR, single-family residence manufactured home
41W34CC 301	1.5	Zoned AR, accessory structure
41W34CC 400	5.1	Zoned AR, single-family residence, accessory structure
41W34CC 500	0.9	Zoned AR, manufactured home
41W34CC 501	0.5	Zoned AR, manufactured home
41W34CC 600	3.2	Zoned AR, vacant
41W34CC 700	0.7	Zoned AR, manufactured home, accessory structures
41W34CC 800	0.8	Zoned AR, two manufactured homes
41W34CC 900	1.8	Zoned AR, single-family residence, accessory structures
41W34CC 1000	1.0	Zoned AR, manufactured home, accessory structures
41W34CC 1100	1.3	Zoned AR, manufactured home
41W34CC 1101	1.3	Zoned AR, manufactured home, accessory structure
41W34CC 1200	2.6	Zoned AR, single-family residence
<b>Total Area</b>	<b>49.3</b>	

Source: Marion County Assessor data and MWVCOG. 2007.

Due to the established residential land use pattern and poor access to major transportation facilities, Study Area 1 is not included in the proposed commercial/industrial UGB expansion.

**Study Area 6:** Study Area 6 is the second exception area considered as part of the UGB analysis. This area is located north of the existing Hubbard UGB on both the east and west sides of Highway 99E. Property sizes in Study Area 6 range in size from 0.3 acres to 2.1 acres. The overall size of Study Area 6 is approximately 26.0 acres.

Properties in this area have frontage and direct access to Highway 99E, with the exception of Tax Lot 1101 (Assessor Map 41W27CD), which has easement access across adjacent Tax Lot 1100. Several properties served by Saunders Lane, a private easement that extends to Highway 99E. These include Assessor Map 41W27CD, tax lots 1200, 1201, and 1202 and Assessor Map 41W34B, tax lots 200, 300, and 400.

Properties on the west side of Highway 99E are located between Highway 99E and the Southern Pacific Railroad tracks.

All properties in Study Area 6 are zoned Acreage Residential (AR), with the exception of two (2) properties located on the west side of Highway 99E zoned Light Industrial (IL), tax lots 1900 and 2000 (Assessor Map 041W34B).

Table 14 shows the properties and existing uses found in Study Area 6.

**UGB Findings Table 14**  
**Study Area 6 – North of the existing Hubbard UGB adjacent to Highway 99E**  
**Assessor Map Number 41W27CD and Assessor Map 41W34B**

Tax Lot	Size (acres)	Comments
<b>East side of Highway 99E</b>		
41W27CD 100	1.2	Zoned Acreage Residential (AR), two manufactured homes
41W27CD 200	0.6	Zoned AR, vacant
41W27CD 300	1.0	Zoned AR, single-family residence
41W27CD 400	1.2	Zoned AR, single-family residence
41W27CD 500	1.1	Zoned AR, single-family residence
41W27CD 600	1.2	Zoned AR, single-family residence
41W27CD 700	2.5	Zoned AR, single-family residence and three manufactured homes
41W27CD 800	0.9	Zoned AR, manufactured home
41W27CD 900	1.5	Zoned AR, single-family residence
41W27CD 902	2.0	Zoned AR, manufactured home
41W27CD 1100	2.1	Zoned AR, single-family residence
41W27CD 1101	1.5	Zoned AR, single-family residence
41W27CD 1200	1.5	Zoned AR, single-family residence
41W27CD 1201	1.7	Zoned AR, single-family residence
41W27CD 1202	1.5	Zoned AR, single-family residence
41W34B 200	1.5	Zoned AR, single-family residence
41W34B 300	1.5	Zoned AR, single-family residence
41W34B 400	1.6	Zoned AR, single-family residence and manufactured home
41W34B 500	0.2	Zoned AR, single family residence
<b>West side of Highway 99E</b>		
41W27CD 1400	0.5	Zoned AR, accessory structure
41W27CD 1500	0.8	Zoned AR, single-family residence
41W27CD 1600	0.5	Zoned AR, vacant
41W27CD 1700	0.3	Zoned AR, manufactured home

Tax Lot	Size (acres)	Comments
41W27CD 1800	0.4	Zoned AR, single-family residence
41W27CD 1900	1.0	Zoned Light Industrial (IL), vacant
41W27CD 2000	1.0	Zoned IL, vacant
<b>Total area</b>	<b>26.0</b>	

Source: Marion County Assessor data and MWVCOG, 2007.

**Table 14** above shows the predominant land use found east of Highway 99E is residential. Additionally, there is only one (1) vacant lot (0.6 acres) located east of Highway 99E in Study Area 6 that is over 1,000 feet north of the existing Hubbard UGB. Properties west of Highway 99E consists primarily of residential uses. The two (2) vacant lots zoned Marion County Light Industrial, are not contiguous with the existing UGB as they are located over 600 feet from the current UGB and citylimits. For these reasons, Study Area 6 is not included in the proposed UGB expansion.

**Study Area 2:** Study Area 2 consists of a 25.2-acre exception area located south of the existing Hubbard UGB on the east side of Highway 99E. The area is bounded on the west by the Southern Pacific Railroad tracks. **Table 15** shows the properties included in Study Area 2. Given the location of Study Area 2 adjacent to existing commercial and industrial development to the north and east across Highway 99E, this area was analyzed for possible inclusion in the UGB to meet the employment needs identified as part of the city's Economic Opportunities Analysis (EOA). The EOA identified approximately 11.4 acres of vacant or redevelopable land that would be needed to meet projected employment needs through 2027 (see Table 11).

**UGB Findings Table 15**  
**Study Area 2 – South of the existing Hubbard UGB on the east side of Highway 99E**  
**Assessor Map Number 41W33DC and Assessor Map 41W33DB**

Tax Lot	Size (acres)	Comments
41W33DC 400	2.5	Zoned Acreage Residential (AR), vacant
41W33DC 500	1.7	Zoned AR, vacant
41W33DC 600	3.5	Zoned AR, single-family residence
41W33DC 700	0.5	Zoned AR, single-family residence
41W33DC 800	2.8	Zoned AR, vacant
41W33DC 900	4.7	Zoned AR, vacant
41W33DC 1000	0.9	Zoned Commercial, commercial shop building
41W33DC 1100	4.0	Zoned Commercial, warehouse and manufactured structure
41W33DB 2900	4.6	Zoned AR, vacant
<b>Total area</b>	<b>25.2</b>	

Source: Marion County Assessor data and MWVCOG, 2007.

Tax lots 900 and 1000 (Assessor Map 41W33DC) have frontage and access on Highway 99E. The remaining parcels within the Study Area have access from Schmidt Lane NE, which is currently part of the Marion County road system. This portion of Schmidt Lane NE has a 40-foot wide right-of-way and is graveled.

Tax lots 1000 and 1100 (Assessor Map 41W33DC) are currently developed with an auto liquidator business and an RV/boat storage facility. These properties are included in the proposed UGB expansion to ensure a more efficient provision of public facilities and services under the city's jurisdiction.

Tax lots 600 and 700 (Assessor Map 41W33DC) are developed with single-family residences.

Within Study Area 2, the five (5) vacant properties as well as the vacant portion Tax Lot 600, which is developed with a single-family residence, all have the potential to provide for the city's identified employment needs through 2027. The existing commercial development on tax lots 1000 and 1100 and the existing single-family residence on Tax Lot 700 preclude these properties from providing for future employment needs. Overall, these properties could provide approximately 19.3 acres for future commercial and industrial development (Note: 0.5 acre has been subtracted for the existing residence on Tax Lot 600). The available acreage exceeds the 11.4 acres identified in the city's Economic Opportunities Analysis as the amount of acreage needed to provide for commercial and industrial employment through 2027.

*Oregon Administrative Rules (OAR) 660-024-0060 provides standards for conducting a boundary location alternatives analysis. Specifically, OAR 660-024-0060 (1)(b) requires that:*

*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.*

*The four location factors of Statewide Planning Goal 14 – Urbanization are as follows:*

*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.*

Table 16 shows the four (4) vacant and two (2) commercially developed properties and county right-of-way within Study Area 2 that are proposed for inclusion within the Hubbard UGB.

**UGB Findings Table 16**  
**Portion of Study Area 2 Proposed for the Hubbard UGB Expansion**

Tax Lot	Size (acres)	Comments
41W33DC 400	2.5	Zoned Acreage Residential (AR), vacant
41W33DC 500	1.7	Zoned AR, vacant
41W33DC 800	2.8	Zoned AR, vacant
41W33DC 900	4.7	Zoned AR, vacant
41W33DC 1000	0.9	Zoned Commercial (C), developed
41W33DC 1100	4.0	Zoned C, developed
Highway 99E	2.0	Right-of-way located adjacent to the proposed expansion properties.
Schmidt Ln	0.6	Right-of-way located adjacent to the proposed expansion properties.

Source: Marion County Assessor data and MWVCOG, 2008.

The location factors of Goal 14, describing why the properties shown in **Table 16** are those properties within Study Area 2 that are best-suited for inclusion in the Hubbard UGB are addressed as follows.

The four (4) vacant properties located on either side of Schmidt Lane NE closest to Pacific Highway 99E comprise approximately 11.7 acres. These properties would meet the identified need for additional commercial and industrial land through 2027. These properties are located closest to existing commercial and industrial development on Highway 99E. Consequently, inclusion of these properties within the UGB would provide for the most efficient accommodation of identified land needed for future commercial and industrial employment.

These properties are also located directly adjacent to existing commercial and industrial development to the north, within the existing Hubbard UGB. The area is also located across Pacific Highway 99E from the Hubbard Industrial Park. Properties to the south, Assessor Map 41W34DC, tax lots 1000 and 1100, located within the Study Area are zoned Commercial by Marion County and are developed with a commercial use. The proposed expansion site would result in a more compact urban area by including vacant parcels already surrounded by commercial and industrial uses on three sides. Assessor Map 41W33DB, Tax Lot 2900 and Assessor Map 41W33DC, Tax Lot 600 would not efficiently accommodate land needs identified in the EOA because they lack close proximity to the highway and visibility.

Given the location of these properties in relation to other properties within Study Area 2, including these properties within the UGB will allow for the most orderly and economic provision of public facilities and services. These properties are located in nearest proximity to Pacific Highway 99E with available services located within the Pacific Highway 99E right-of-way approximately 250 feet north at the existing UGB. With the availability of Schmidt Lane NE to provide property access, which will not require construction of additional access points on Pacific Highway 99E, the area is well-suited for future commercial and industrial development. Development of these properties will necessitate extension of existing utilities some 250 feet from their current terminus in Pacific Highway 99E at the south city limits. Improvements to Schmidt Lane NE, including the dedication of additional right-of-way and construction of street improvements would be required as a condition of development for these properties. The proposed expansion area also provides for a more cohesive and coordinated area to manage transportation access along Pacific Highway 99.

Including tax lots 600 and 2900 would result in a less orderly and economic provision of public facilities and services because development of these sites would require extending public facilities and services an additional 410 feet beyond the proposed expansion area.

Including these properties within the UGB as opposed to other available properties in Study Area 2 will provide some minimal energy savings and reduced environmental consequences. Given the close proximity to Pacific Highway 99E there will be slightly less energy used by vehicles traveling to these properties. Additional energy savings would also result from having to extend public facilities and utilities a shorter distance. By providing an orderly provision of storm drainage improvements as part of the street improvements to Schmidt Lane NE, the environmental consequences of including these four (4) vacant properties will be no greater than if other properties within Study Area 2.

Economic and social consequences associated with the proposed expansion area again relate to the orderly provision of services. Developing the areas closest to Pacific Highway 99E provides for the least cost solution to extension of utilities and road improvements. In addition, including areas closest to the developed Pacific Highway 99E corridor meets the business site requirements identified in the recently completed EOA by providing the greatest opportunity for business visibility and compatibility with developed industrial and commercial uses along the highway. While other properties within the Study Area located further west on Schmidt Lane NE would be available for future inclusion in the UGB to meet employment projections as identified in subsequent updates to the Hubbard Comprehensive Plan, the four (4) vacant properties identified need to be developed first to provide an orderly progression of development.

Of the four (4) vacant properties proposed for inclusion in the UGB, only a portion of the southwest corner Tax Lot 900 (approximately 85 feet) abuts a property zoned for Exclusive Farm Use (Assessor Map 41W33, Tax Lot 800), which is currently in agricultural use. The remainder of the properties proposed for inclusion in the UGB abuts other exception areas. These include properties to the north within the existing Hubbard city limits. Improvements to Schmidt Lane NE will benefit adjacent Tax Lot 800 (Assessor Map 41W33), which has a narrow flag access onto this road. Adjacent Tax Lot 600 shares an approximately 410-foot long common boundary with Tax Lot 800. While this does not mean that including Tax Lot 600 within the UGB will necessarily be incompatible with nearby agricultural activities, the fact that only a very small portion of the area proposed for inclusion in the UGB abuts land in agricultural use will ensure that the proposed expansion has the least possible impact on nearby agricultural activities.

For these reasons, the four (4) vacant properties shown in Table 15 best provide for future employment needs, while providing for an orderly and economic provision of services, with relatively fewer adverse environmental, energy, economic and social consequences, and minimal impacts to nearby agricultural activities on properties outside the UGB.

*(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 (1991 Edition).*

**Findings:** No land designated as marginal land is located within Marion County.

*(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.*



**Findings:** The exception land found in Study Area 2 is adequate to accommodate the amount of future commercial and industrial land needed. No agricultural or forestry land is included in the proposed UGB expansion.

## **GOAL 14 URBANIZATION FINDINGS**

In addition to the priority system requirements of ORS 197.298, Statewide Planning Goal 14 – Urbanization requires consideration of the following factors:

### ***Goal 14 - Urbanization Boundary Location***

***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;***

**Findings:** The findings above outline the need for an additional 11.4 acres of land for future commercial and industrial employment. Site characteristics for future commercial and industrial development as described in the EOA, include building sites with slopes less than 15 percent, on soils without severe building limitations. These businesses often locate on parcels between one (1) to three (3) acres in size that are preferably rectangular in shape with a lot depth of 200 to 300 feet. Small-scale manufacturers prefer direct access to a state highway or other well-travel transportation facility. Additionally, consideration should be given to provide some buffering between industrial and residential uses and avoiding truck traffic through residential areas.

The exception lands found in Study Areas 1 and 6 are primarily developed with rural residences, leaving little to no area for buffering between industrial and residential uses. Additionally, truck traffic would be required to travel through local residential streets in Study Area 1.

Study Area 2 on the other hand, is located adjacent established commercial and industrial uses to the north, south and east. The railroad provides a buffer along the west boundary. The proposed UGB expansion in Study Area 2 has access to Highway 99E through Schmidt Lane. Commercial and industrial development within the proposed expansion area would not be required to travel through a residential area to access Highway 99E. Public utilities located within the Highway 99E are available to serve these properties.

With respect to parcel shapes and sizes, the proposed expansion area found in Study Area 2 meets the one (1) to three (3) acre parcel size requirement. The parcels are rectangular in shape and provide adequate lot width and depth to accommodate small to medium size commercial and industrial uses. Parcels located in Study Areas 1 and 6 are primarily developed with residences and vacant parcels over one acre in size are not located contiguous to the existing UGB.

The Little Bear Creek, an intermittent stream, flows across the northernmost portion of the proposed UGB expansion area found in Study Area 2. Based upon a review of the FEMA flood maps, the proposed expansion area is not constrained by the 100-year floodplain. Additionally, the slope of the proposed UGB expansion site is less than 15 percent.

For these reasons, the area proposed for expansion meets identified land needs in an efficient manner.

*(2) Orderly and economic provision of public facilities and services;*

**Findings:** The proposed commercial and industrial expansion area is located directly adjacent to existing commercial and industrial development to the north, where existing public facilities and services are readily available. The area is also located adjacent to Highway 99E and across from the Hubbard Industrial Park.

Public utilities to serve this area located within the Highway 99E, approximately 250 feet north at the existing UGB. These properties are located adjacent to Schmidt Lane NE, which would be improved to City standards upon annexation and development. Schmidt Lane has direct access to Highway 99E.

Access to the sites with the greatest redevelopment potential for future commercial and industrial land use located in Study Areas 1 and 6 would require extending public facilities 600 to 1000 feet across properties with little to no redevelopment potential and would not result in the economic provision of public facilities and services.

The proposed expansion site found in Study Area 2 would result in the orderly and economic provision of public facilities and services by including vacant parcels already surrounded by commercial and industrial uses on three sides to create a more compact urban area. These findings demonstrate that the areas proposed for expansion provide for the orderly and economic provision of public facilities and services.

*(3) Comparative environmental, energy, economic and social consequences; and*

**Findings:** Regarding environmental consequences, Study Area 1 has a creek located in the southeast corner of the study area. The Little Bear Creek, an intermittent creek, crosses the northern boundary of Study Area 2. There are no known water features located within Study Area 6. Based upon a review of the FEMA flood maps, the proposed UGB expansion area located in Study Area 2 is not located within the 100 year floodplain. Any impacts to possible wetland areas not currently identified within the study area, will be reviewed and mitigated at the time of development as needed. None of the study areas are limited by severe slopes or landslide hazard areas.

Regarding energy consequences, the area proposed for expansion would require less energy use by providing better pedestrian and bicycle access to existing development in Hubbard. This would result in fewer vehicle trips. The parcels with the greatest redevelopment potential in Study Areas 1 and 6 are located further away from downtown Hubbard, in areas without sidewalk or bicycle facilities.

For the proposed commercial and industrial expansion area, the comparative environmental, energy, economic and social consequences findings relate to a comparison of properties located within the existing exception area located south of the Hubbard UGB, identified as Study Area 2. **Table 17** again shows the properties located in the existing exception area identified as Study Area 2. The properties shown in bold are those proposed for inclusion in the UGB for commercial and industrial development.

**UGB Findings Table 17**  
**Study Area 2 – South of the existing Hubbard UGB on the east side of Highway 99E**  
**Assessor Map Number 41W33DC and Assessor Map 41W33DB**

Tax Lot	Size (acres)	Comments
41W33DC 400	2.5	Zoned Acreage Residential (AR), vacant
41W33DC 500	1.7	Zoned AR, vacant
41W33DC 600	3.5	Zoned AR, single-family residence
41W33DC 700	0.5	Zoned AR, single-family residence
41W33DC 800	2.8	Zoned AR, vacant
41W33DC 900	4.7	Zoned AR, vacant
41W33DC 1000	0.9	Zoned Commercial, commercial shop building
41W33DC 1100	4.0	Zoned Commercial, warehouse and manufactured structure
41W33DB 2900	4.6	Zoned AR, vacant
<b>Total area</b>	<b>25.2</b>	

Source: Marion County Assessor data and MWVCOG, 2007.

Including these properties within the UGB as opposed to other available properties in Study Area 2 will provide some minimal energy savings and reduced environmental consequences. Given the close proximity to Pacific Highway 99E there will be slightly less energy used by vehicles traveling to these properties. Additional energy savings would also result from having to extend public facilities and utilities a shorter distance. By providing an orderly provision of storm drainage improvements as part of the street improvements to Schmidt Lane NE, the environmental consequences of including these properties will be no greater than if other properties within Study Area 2.

Economic and social consequences associated with this proposed expansion area relate to the orderly provision of services. Developing the areas closest to Pacific Highway 99E provides for the least cost solution to extension of utilities and road improvements. In addition, including areas closest to the developed Pacific Highway 99E corridor meets the business site requirements identified in the recently completed EOA by providing the greatest opportunity for business visibility and compatibility with developed industrial and commercial uses along the highway. While other properties within the Study Area located further west on Schmidt Lane NE would be available for future inclusion in the UGB to meet employment projections as identified in subsequent updates to the Hubbard Comprehensive Plan, the properties identified need to be developed first to provide an orderly progression of development.

Of the properties proposed for inclusion in the UGB, only the south and west property lines of tax lots 900 and 1100 abut a property zoned for Exclusive Farm Use (Assessor Map 41W33, Tax Lot 800), which is currently in agricultural use. The remaining properties proposed for inclusion in the UGB abut other exception areas. These include properties to the north within the existing Hubbard city limits. Improvements to Schmidt Lane NE will benefit adjacent Tax Lot 800 (Assessor Map 41W33), which has a narrow flag access onto this road. Adjacent Tax Lot 600 shares an approximately 410-foot long common boundary with Tax Lot 800. While this does not mean that including Tax Lot 600 within the UGB will necessarily be incompatible with nearby agricultural activities, the fact that only a very small portion of the area proposed for inclusion in the UGB abuts land in agricultural use will ensure that the proposed expansion has the least possible impact on nearby agricultural activities.

For these reasons, the proposed commercial and industrial expansion area best provides for future employment needs, while providing for an orderly and economic provision of services, with relatively fewer adverse environmental, energy, economic and social consequences.

***(4) Compatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB.***

**Findings:** The proposed commercial and industrial expansion area is an exception (nonresource) area that is currently zoned Acreage Residential (AR) by Marion County. This property abuts existing exception areas both inside the existing UGB and to west and south. Highway 99E abuts this area to the east.

Access to this area is readily available from Schmidt Lane NE, which provides connection to Highway 99E. Schmidt Lane NE is an approximately 20-foot wide gravel road developed within a 40-foot wide right-of-way. One farm parcel located south of the expansion area, Assessor Map 41W33, Tax Lot 800, has access to Schmidt Lane NE via an approximately 450-foot long access drive that abuts the southern property line of tax lots 800 and 900 (Assessor Map 41W33DC) that are included as part of the proposed expansion area. As properties in this expansion area develop, additional right-of-way will be dedicated and Schmidt Lane NE will be improved to City standards, with a paved surface within a 60-foot wide right-of-way. The driveway apron serving Tax Lot 800 can be improved in conjunction with this development. Consequently, development of the proposed commercial and industrial expansion area will improve available access for this agricultural parcel.

In addition, the relatively small size of the buildable proposed expansion area is located on either side of Schmidt Lane NE and will not create significant adverse traffic impacts that would impact Tax Lot 800. Typically, industrial uses in the Hubbard area include small manufacturing and distribution firms, which do not generate high traffic volumes. Similarly, commercial uses along Pacific Highway 99E often include businesses selling durable goods. Such commercial uses also do not generate high traffic volumes. High traffic volume retail uses that serve Hubbard are located in Woodburn. Development of the proposed commercial and industrial expansion area will be compatible with agricultural activities on adjacent Tax Lot 800.

Other than Tax Lot 800, no other agricultural properties are located in the near vicinity of the proposed commercial and industrial expansion area.

Oregon Administrative Rules (OAR) 660-024-0060(8) requires the following analysis be conducted as part of a UGB expansion.

***660-024-0060 - Boundary Location Alternatives Analysis***

***(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.*

**Findings:** The following section includes an analysis of the relative advantages and disadvantages of serving the alternate UGB expansion study areas with respect to public facilities and services based upon a review of the City's water, sewer, stormwater and transportation plans, in addition to, comments received from public facility and service providers. Comments provided by the City of Hubbard Public Works Superintendent, City Engineer, Marion County Public Works Department and the Oregon Department of Transportation may be found in Exhibits A2, A3, and A4.

## **Study Area 1**

### **Existing Public Facilities and Services**

Water, Sewer, and Stormwater: Development within Study Area 1 is served by individual septic systems and wells. There is an existing ten (10) inch water main in Whiskey Hill Road. Storm water service consists of an open ditch on Whiskey Hill Road which discharges in an easterly direction into the Pudding River. The closest sewer main is an eight (8) inch sewer line located approximately 60 feet north of the study area in Casteel Drive.

Streets: Properties in the western portion of the Study Area are located on Dunn Road NE. Properties in the eastern portion of the Study Area are located on Painter Loop NE. Both of these roads are part of the Marion County road system and extend north and south, connecting with Whiskey Hill Road to the north. The area also contains a 20-foot wide platted alley that extends north and south approximately 200 feet east of Dunn Road NE. The alley is undeveloped and development in the area has encroached on the alley right-of-way.

Dunn Road NE has a 40-foot wide right-of-way, and approximately 100 feet of the road extending south from the intersection with Whiskey Hill Road is paved. The remainder of the road is graveled. No sidewalks are present on Dunn Road NE.

Painter Loop Road NE has a 40-foot wide right-of-way; except for an approximately 250-foot section with a 50-foot wide right-of-way located adjacent to tax lots 300 and 301 (Assessor Map 41W34CC). No sidewalks are present on the portion of Painter Loop NE located within the Study Area.

## **Capacity and Impacts to Existing Public Facilities and Services**

Based upon a review of the city's public facility master plans, there appears to be sufficient capacity of existing public facilities and services to serve the Study Area with water, sewer and stormwater services upon extension of city services to the area. The ability to extend city services to the area would require willingness on the part of property owners to annex to the city. The parcelized nature of the Study Area would likely create impediments to future development as some property owners may choose not to be annexed. Properties with the highest development potential in the area are located approximately 400 to 700 feet south of Whiskey Hill Road. This means that extensive off-site street improvements and the extension of water and sewer services will be required to develop these properties. An additional expense to providing public facilities in the Study Area would most likely include installation of sewer lift stations to the southern portion of the study area, which is lower than the northern portion of the Study Area.

The Hubbard Stormwater Master Plan identifies construction of a trunkline in Whiskey Hill Road which will convey storm water from areas south and east of Pacific Highway 99E to a proposed drainage system on Painter Loop Road. The Stormwater Plan also identifies a drainage system on Painter Loop Road that would consist of intermittent subsurface piping, culverts, ditches, and lined channels. A storm water detention facility would be constructed on the terminal end of the line near the proposed outfall location.

The existing street network located within the Study Area is insufficient to serve development at urban densities. The existing 40-foot wide right-of-way for Dunn Road NE and Painter Loop NE (except for the approximately 250 foot section of 50-foot wide right-of-way previously described) do not meet City standards for local streets, which require a 50-foot wide right-of-way, or for collector streets, which require a 60-foot wide right-of-way. This means that right-of-way dedications would be required for all redevelopment in the area. Without these dedications, streets in the area could not be developed to City standards.

Due to the overall limited redevelopment potential of this area, impacts to existing water, sewer, stormwater and transportation facilities serving nearby areas inside the UGB would be minimal if these properties redeveloped.

### **Need for New Transportation Facilities**

In order to create a well connected and multi-modal transportation system as specified in the Hubbard Transportation System Plan (TSP), Study Area 1 would require at least one new east-west street connection. Establishing east-west street connections in this area would be difficult to establish as construction of one (1) or more connections in this area would be dependent on specific properties redeveloping.

## **Study Area 2**

### **Existing Public Facilities and Services**

Water, Sewer, and Stormwater: Comments provided by the Public Works Superintendent indicate there is an existing ten (10) inch water main and an existing ten (10) inch sewer main in Pacific Highway 99E in this area. Storm water service is currently provided by an open ditch (Bear Creek), which flows in a westerly direction.

Streets: Tax Lots 900 and 1000 (Assessor Map 41W33DC) have frontage and access on Pacific Highway 99E. The remaining parcels within the Study Area have access from Schmidt Lane NE, which is currently part of the Marion County road system. This portion of Schmidt Lane NE has a 40-foot wide right-of-way and is graveled. Pacific Highway 99E is classified as a major arterial and Schmidt Lane, is classified as a collector street, in the Hubbard TSP.

### **Capacity and Impacts to Existing Public Facilities and Services**

The City Engineer and indicated that based upon a review of the City's Master Plans for Water, Sanitary Sewer, Storm Drainage and Transportation, the City has or can make available the infrastructure required to support the proposed UGB expansion in this Study Area. Water and sewer service to serve this area would need to be extended approximately 250 feet north of the existing UGB.

The area proposed for expansion within Study Area 2 is currently zoned Marion County AR that would allow the parcels to be developed with one (1) single-family dwelling on a minimum two (2) acre parcel. Tax lots 400, 500 and 800 (Assessor Map 41W33DC) would each allow the development of one (1) single family dwelling under the current county zoning designation. Tax lot 900 is approximately 4.7 acres in size and could accommodate two (2) dwellings based upon the minimum lot size in the AR Zone District. At most, five (5) single-family dwellings could be built on the proposed expansion area prior to annexation. Five (5) additional single-family dwellings would generate approximately 60 additional trips on Pacific Highway 99E. According to comments provided by ODOT, the current PM peak volume on Pacific Highway 99E is estimated to be 1,900 vehicles. Based upon an analysis of the current PM peak volume on Pacific Highway 99E, there is sufficient capacity on Pacific Highway 99E to accommodate the proposed UGB expansion within Study Area 2.

Due to the existing industrial and commercial development in the Study Area and limited potential for large new industrial uses, impacts to existing water, sewer, stormwater and transportation facilities serving nearby areas inside the UGB would be minimal if these properties redeveloped.

### **Need for New Transportation Facilities**

Schmidt Lane would need to be improved to city collector street standards prior to any industrial/commercial development within Study Area 2. Comments provided by Marion County Public Works Department indicate the properties adjacent to Schmidt Lane NE do not appear to be adequately served by stub streets and connecting streets from the City. The County encourages improving connectivity in the area by identifying a north-south connector in this area. A new north-south street connection would be included in the next TSP update or as part of a transportation impact study required at the time zone change, prior to development.

A transportation impact analysis (TIA) and construction of any measures necessary to ensure consistency with ODOT requirements for OR 99E would be required prior to future industrial development. When the property is rezoned to Industrial/Commercial use, conditions will be placed on the land use action indicating that no direct access to Pacific Highway 99E will be permitted from these future industrial parcels as requested by ODOT.

## Study Area 6

### Existing Public Facilities and Services

Water, Sewer, and Stormwater: Acreage residential sites located within Study Area 6 are served by wells and individual septic systems. The closest city water, sewer and stormwater services are located within Pacific Highway 99E approximately 175 feet south of the Study Area

Streets: The majority of the properties in this area have frontage and direct access to Pacific Highway 99E. Several parcels on the east side of Highway 99E receive access from private accessways that connect to Pacific Highway 99E. There are currently no local street connections to serve this area.

### Capacity and Impacts to Existing Public Facilities and Services

Based upon a review of the city's public facility master plans, there appears to be sufficient capacity of existing public facilities and services to serve the Study Area with water, sewer and stormwater services upon extension of city services to the area. The ability to extend city services to the area would require willingness on the part of property owners to annex to the city. The parcelized nature of the Study Area would likely create impediments to future development as some property owners may choose not to be annexed.

Utilities would need to be extended a minimum of 175 feet from inside the existing city limits on Pacific Highway 99E to serve the parcel nearest to the existing city limits with development potential (Assessor Map 41W27CD, Tax Lot 1400). The limited development potential in the area as analyzed previously, makes the extension of utilities and the construction of street improvements, including improvements to Highway 99E, cost prohibitive.

The lack of an existing or planned street network to this area limits the capacity of existing transportation facilities within the Study Area and directs traffic to a single roadway - Pacific Highway 99E.

Due to the limited amount of redevelopment potential in this area, impacts to existing water, sewer, stormwater and transportation facilities serving nearby areas inside the UGB would likely be minimal upon redevelopment.

### Need for New Transportation Facilities

Transportation facilities needed within Study Area 6, include improvements along Pacific Highway 99E. To redevelop parcels located along Saunders Lane, which is currently served by a 30-foot wide easement, would require dedication of Saunders Lane as a public right-of-way, with a minimum 50-foot wide right-of-way width as well as construction of Saunders Lane to City standards. The six (6) lots located on Saunders Lane are approximately 1.5 acres in size each and have existing residential improvements with high assessed values, thereby making redevelopment of these parcels in the future unlikely.

The Hubbard TSP shows an east-west collector street (Exhibit A-1) that would connect with Highway 99E along the southern edge of the Study Area. Including Study Area 6 within the UGB would be more appropriate when development of the properties further east construct the first phase of this planned collector street.



**UGB Findings Table 18**  
**Summary of the Boundary Location Alternatives Analysis**

<b>Study Area</b>	<b>Water/Sewer/Stormwater</b>	<b>Streets</b>	<b>Conclusion</b>
<b>1</b>	Services available within Whiskey Hill Road; extension constrained by parcelized nature of area.  Southern portion of the area would likely require a sewer lift station.	Current street network is substandard; existing development and parcelization within the area provide severe constraints to future redevelopment within the area.	The city's ability to provide public facilities to this area in a cost efficient manner is POOR.  The study area would not likely create significant impacts to the city's existing public facilities and services.
<b>2</b>	Services are readily available within Pacific Highway 99E.	Adequate capacity exists. Further traffic impacts assessed at time of rezoning to commercial/industrial.	The city's ability to provide public facilities to this area in a cost efficient manner without significant impacts to the city's existing public facilities and services is GOOD.
<b>6</b>	Services available within Pacific Highway 99E; extension constrained by parcelized nature of area.	The Study Area is not well served by the existing and planned city street network.  Existing development and parcelization within the area provide severe constraints to future redevelopment within the area.	The city's ability to provide public facilities to this area in a cost efficient manner is POOR.  The study area would not likely create significant impacts to the city's existing public facilities and services.

**Table 18** and the analysis above indicate the best area to serve from a public facility standpoint includes Study Area 2, located south of the existing UGB. Study Areas 1, and 6 would be the most costly and least efficient areas to extend city services to in the future.

In addition to the criteria found in ORS 197.298 and OAR 660-024, Land Use Policy 7 of the Hubbard Comprehensive Plan requires consideration of the following factors when considering an urban growth boundary expansion.

*Land Use Goals and Policies*

7. *The City of Hubbard will consider urban growth boundary expansions based upon consideration of the following factors:*
- a. Accommodation of additional population;*
  - b. Housing, employment opportunities, and livability;*

**Findings:** Criteria 7a does not apply as a revised coordinated population forecast is not proposed at this time. Housing opportunities and needs will be addressed during a separate comprehensive plan update.

Analyses of employment needs through 2027 were conducted. A buildable lands inventory was also developed to determine the adequacy of land within the existing Hubbard UGB to accommodate employment needs through 2027.

**Table 19** shows the 2027 total employment projection for Hubbard. Total employment is projected to increase to 2,854 by 2027, an increase of 781 jobs. This represents an increase of 38 percent over 2004 total employment.

**UGB Findings Table 19  
Total Employment Projection  
Hubbard, 2027**

Sector	2004		2027	
	Percent	Total	Percent	Total
Agriculture, Forestry, Fishing & Hunting	34.5%	715	34.5%	985
Manufacturing	19.8%	411	19.8%	565
Construction	16.8%	349	16.8%	479
Wholesale Trade, Transportation, and Warehousing	3.8%	78	3.8%	108
Retail Trade	8.2%	170	8.2%	234
Real Estate and Services	13.3%	276	13.3%	380
Public Sector (Local, State and Federal Employment)	3.6%	74	3.6%	103
<b>Total</b>	<b>100.0%</b>	<b>2,073</b>	<b>100.0%</b>	<b>2,854</b>

Source: 2004 employment data provided by the State of Oregon Employment Department. 2004 data sorted and summarized by MWVCOG, 2007. Local employment projection for 2027 calculated by MWVCOG.

**Table 20** shows the amount of land needed to accommodate new commercial and industrial employment growth through 2027. Approximately 25.2 acres will be needed to accommodate projected commercial employment growth through this period. Approximately 20.1 acres will be needed to accommodate projected industrial employment growth through this period.

**UGB Findings Table 20  
Land Need by Land Use Type  
Hubbard 2027**

Sector	Total Employment Growth	Employees Per Acre	Total Demand (acres)
Commercial	168	11.2	15.0
Industrial	314	15.2	20.7
<b>Total</b>	<b>482</b>		<b>35.7</b>

Source: MWVCOG, 2007.

**Table 21** shows a comparison of available commercial and industrial land and the amount of land needed to meet projected employment in Hubbard through 2027. The analysis shows that Hubbard does not have enough land to meet the projected need for commercial and industrial land through 2027. A total of 11.4 acres are needed to meet projected employment in Hubbard through 2027.

**UGB Findings Table 21  
Comparison of Supply and Demand for Commercial and Industrial Land  
Hubbard, 2027**

Land Use Type	Vacant/Redevelopable Acres
<b>Supply</b>	
Commercial	6.9
Industrial <sup>1</sup>	19.6
Total Supply	26.6
<b>Demand</b>	
Commercial	15.0
Industrial	20.7
Total Demand	35.7
<b>Surplus (Deficit)</b>	
Commercial	(8.1)
Industrial	(1.1)
Total	(9.1)
<b>Additional land needed for public uses - streets, parks, etc. (25% of 20-year land needs)</b>	2.3
<b>Total Commercial and Industrial Land Needs</b>	11.4

Source: MWVCOG, 2007.

<sup>1</sup> Includes parcels zoned Industrial-Commercial

**Table 22** summarizes commercial and industrial land needs for Hubbard through 2027. An additional 11.4 acres must be added to the existing UGB to accommodate future employment needs. Land for public uses equal to 25 percent of the land need is included as provided OAR 660-024-0040 (9).

**UGB Findings Table 22  
Summary of Commercial and Industrial Land Needs  
Hubbard, 2027**

20-year commercial and industrial land needs	35.7 acres
Land currently available within the existing UGB for commercial and industrial development	26.6 acres
Additional land needed within the UGB for commercial and industrial development	9.1 acres
Additional land needed for public uses - streets, parks, etc. (25% of 20-year land needs)	2.3 acres
Total amount of additional land needed within the UGB for commercial and industrial development	11.4 acres

Source: MWVCOG, 2007.

**Table 23** summarizes the commercial, and industrial land needs and the amount of land proposed for inclusion in the Hubbard UGB. The overall commercial and industrial land needs total approximately 11.4 acres. The area proposed for inclusion in the UGB totals approximately 11.7 acres of buildable land. The proposed UGB expansion area also includes approximately five (5) acres of developed commercial land that would add to the livability of Hubbard by ensuring a more efficient provision of urban services such as water, sewer and police services.

**UGB Findings Table 23**  
**Summary of 2027 Land Needs and Proposed UGB Expansion**

Map Number/ Tax Lot	Size	Current Use
041W33DC/400	2.5 acres	vacant
041W33DC/500	1.7 acres	vacant
041W33DC/800	2.8 acres	vacant
041W33DC/900	4.7 acres	vacant
Total vacant land	11.7 acres	
041W33DC/1000	0.9 acres	commercial
041W33DC/1100	4.0 acres	commercial
Highway 99E right-of-way	2.0 acres	road
Schmidt Lane right-of-way	0.6 acres	road
Total UGB expansion area	19 acres	

Source: MWVCOG, 2008.

The UGB expansion area provides for an efficient urban growth pattern. The proposed commercial and industrial expansion area south of the existing UGB is located adjacent to commercial and industrial development within the existing UGB. The Hubbard Industrial Park is located east, across Pacific Highway 99E. This area has access available to Pacific Highway 99E via Schmidt Lane NE, which will be improved to City standards upon development of the area. Utilities can be extended south in the Pacific Highway 99E right-of-way to serve this area.

Development of this area for commercial and industrial uses will help provide for the future employment needs of Hubbard residents and thus will contribute to the local economy and overall livability of the community.

*c. Orderly and economical provision of public facilities and services;*

**Findings:** The proposed commercial and industrial expansion area is located directly adjacent to existing commercial and industrial development to the north, where existing public facilities and services are readily available. The area is also located adjacent to Pacific Highway 99E and across from the Hubbard Industrial Park.

Public utilities to serve this area located within the Pacific Highway 99E, approximately 250 feet north at the existing UGB. These properties are located adjacent to Schmidt Lane NE, which would be improved to City standards upon annexation and development. Schmidt Lane has direct access to Highway 99E.

Access to the sites with the greatest redevelopment potential for future commercial and industrial land use located in Study Areas 1 and 6 would require extending public facilities 600 to 1000 feet across properties with little to no redevelopment potential and would not result in the economic provision of public facilities and services.

The proposed expansion site found in Study Area 2 would result in the orderly and economic provision of public facilities and services by including vacant parcels already surrounded by commercial and industrial uses on three sides to create a more compact urban area. These findings demonstrate that the areas proposed for expansion provide for the orderly and economic provision of public facilities and services.

*d. Maximum efficiency of land uses within and on the fringe of the existing urban area;*

**Findings:** The buildable portion of the proposed commercial and industrial expansion area south of the existing UGB is located adjacent to commercial and industrial development within the existing UGB. This expansion area has access available to Pacific Highway 99E via Schmidt Lane NE, which will be improved to City standards upon development of the area. Assessor Map 41W34DC, tax lots 1000 and 1100 are developed and currently have access to Highway 99E from a private driveway. The area is also located across Pacific Highway 99E from the Hubbard Industrial Park. Property to the south, Assessor Map 41W34, tax lot 800, is zoned Exclusive Farm Use by Marion County and is used for agricultural use. The proposed expansion site would result in a more compact urban area by including vacant and developed commercial parcels within the UGB, which are already surrounded by commercial and industrial uses to the north and east.

As was demonstrated in the alternatives analysis, the area proposed for expansion provides for the most efficient development of the urban area. This area is located adjacent to existing commercial and industrial development in an area where utilities are readily available. In addition, the area is not severely limited by physical constraints.

The proposed expansion area provides for the maximum efficiency of land uses within and on the fringe of the existing urban area.

*e. The long term environmental, energy, economic, and social consequences of the locality, the region, and the state as the result of allowing Land Use and not preserving and maintaining the land for agricultural uses, and*

**Findings:** The proposed commercial and industrial expansion area is an exception (nonresource) area that is currently zoned Acreage Residential (AR) and Commercial (C) by Marion County. Adding this area does not convert agricultural land for urban uses. This criterion is not applicable to this area.

*f. Compatibility of the proposed urban use with nearby agricultural activities.*

**Findings:** The proposed commercial and industrial expansion area is an exception (nonresource) area that is currently zoned Acreage Residential (AR) and Commercial (C) by Marion County. This property abuts existing exception areas both inside the existing UGB and to the west and south. Pacific Highway 99E abuts this area to the east.

Access to the undeveloped portion of the proposed expansion area is readily available from Schmidt Lane NE, which provides connection to Pacific Highway 99E. Schmidt Lane NE is an approximately 20-foot wide gravel road developed within a 40-foot wide right-of-way. One farm parcel located south of the expansion area, Assessor Map 41W33, Tax Lot 800, has access to Schmidt Lane NE via an approximately 450-foot long access drive that abuts the southern property line of tax lots 800 and 900 (Assessor Map 41W33DC) that are included as part of the proposed expansion area. As properties in this expansion area develop, additional right-of-way will be dedicated and Schmidt Lane NE will be improved to City standards, with a paved surface within a 60-foot wide right-of-way. The driveway apron serving Tax Lot 800 can be improved in conjunction with this development. Consequently, development of the proposed commercial and industrial expansion area will improve available access for this agricultural parcel.

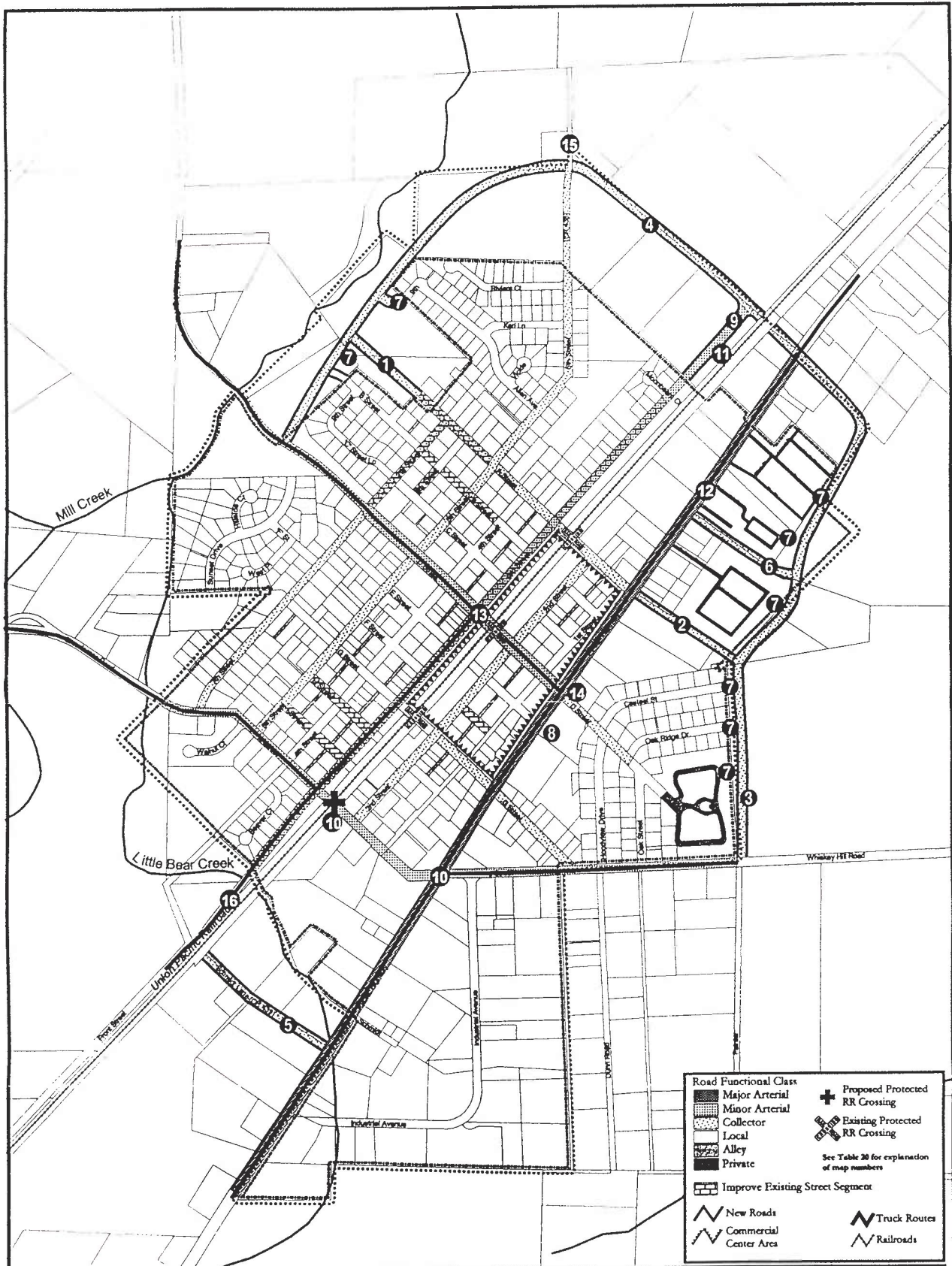
In addition, the relatively small size of the buildable portion of the proposed expansion area, approximately 11.7 acres, located on either side of Schmidt Lane NE will not create significant adverse traffic impacts that would impact Tax Lot 800. Typically, industrial uses in the Hubbard area include

small manufacturing and distribution firms, which do not generate high traffic volumes. Similarly, commercial uses along Pacific Highway 99E often include businesses selling durable goods. Such commercial uses also do not generate high traffic volumes. High traffic volume retail uses that serve Hubbard are located in Woodburn. Development of the proposed commercial and industrial expansion area will be compatible with agricultural activities on adjacent Tax Lot 800.

Other than Tax Lot 800, not other agricultural properties are located in the near vicinity of the proposed commercial and industrial expansion area.

## **Exhibit A-1**

# **Hubbard Transportation Systems Plan Planned Transportation Improvements**



Title:  
**Figure 16. Roadway Network and Rail Plan**

Prepared by:  
 Mid-Willamette Valley Council of Governments

Created by: AJW	Date: May 7, 1999	Revision: 1
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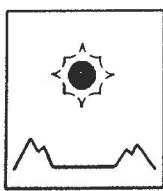
Filename:  
 r:\cog4\projects\hubbard\hub-tsp.apr  
 Rail Plan 11x17 Percent-Rev. 1

City Limits  
 Urban Growth Boundary



This map is for informational purposes only and is not an official document.  
 The Log Company property of the Maroon Company/  
 City of Salem Dept Center

<b>Road Functional Class</b>		<b>Proposed Protected RR Crossing</b>	
	Major Arterial		Proposed Protected RR Crossing
	Minor Arterial		Existing Protected RR Crossing
	Collector	See Table 26 for explanation of map numbers	
	Local	Improve Existing Street Segment	
	Alley		New Roads
	Private		Commercial Center Area
			Truck Routes
			Railroads





## **Exhibit A-2**

# **Comments on transportation impacts Marion County Public Works**



# Marion County OREGON

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JUL 13 2007

## PUBLIC WORKS

MID WILLAMETTE VALLEY  
COUNCIL of GOVERNMENTS

BOARD OF  
COMMISSIONERS  
Sam Brentano  
Janet Carlson  
Patti Milne

July 12, 2007

DIRECTOR  
James V. Sears, P.E.

Suzanne Dufner  
Hubbard City Planner  
Mid-Willamette Valley Council of Governments  
105 High Street SE  
Salem, OR 97301-3667

ADMINISTRATION

BUILDING  
INSPECTION

DOG CONTROL

EMERGENCY  
MANAGEMENT

RE: Hubbard Urban Growth Boundary Expansion - Revised

ENGINEERING

Dear Suzanne:

ENVIRONMENTAL  
SERVICES

This revised letter is in response to your request for comments regarding the proposed Hubbard UGB expansion, specifically regarding impacts to Marion County transportation facilities. Our comments are based on the information provided and may be revised as additional information becomes available.

OPERATIONS

PARKS

PLANNING

SURVEY

The property north of the existing UGB proposed for inclusion in the UGB is a logical extension of the urban area given the layout of existing streets. There are stub streets immediately adjacent to the property. Since these streets are under city jurisdiction, the County road network is not directly affected by the UGB expansion in this area.

The properties adjacent to Schmidt Lane NE do not appear to be adequately served by stub streets and connecting streets from the City. Development in these areas would be isolated from the larger community and would predominately be served by Highway 99E. The County encourages improving connectivity in the community rather than directing all traffic to a single roadway, especially an arterial. A north-south connector in this area should be identified as a need. Since Schmidt Lane will serve predominately urban traffic and function more as a city street than a rural road, it is expected that the City will take over jurisdiction upon annexation of adjacent properties. This should include the westerly portion of Schmidt Lane outside of the UGB to provide continuity of maintenance jurisdiction.

The properties east of the existing UGB do have some stub streets connecting them to existing city streets. However, it is anticipated that development in this area will increase the traffic on Whisky Hill Road. Whisky Hill Road is not built to urban standards and will require substantial

To Suzanne Dufner, Hubbard City Planner  
From Karen G. Odenthal, Transportation Planner  
RE: Hubbard Urban Growth Boundary Expansion  
July 12, 2007

Page 2

improvements, including the addition of bike lanes, curbs, sidewalks, and turning lanes as needed. The Whisky Hill Road right-of-way should be included within the UGB, including that portion of the road between G Street and Painter Loop. Upon annexation of the adjacent properties, the City is expected to take over jurisdiction of Whisky Hill Road, including all remaining pieces of the road within, or adjacent to, the new city limits. This is to provide consistent maintenance responsibility and a single jurisdictional change from City to County.

In accordance with OAR 660-012-0060(1), it is normally expected that a transportation study will be performed as part of the UGB proposal. As you have noted, this need not be applied under the provisions of OAR 660-024-0020 (1)(d), which states:

*(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;*

In this case, you have indicated the anticipated zoning for areas to be added to the Hubbard UGB would be the County's Urban Transition Farming (UTF) Zone. This zoning would be applied until such time as properties within the UGB were annexed into the city. The UTF Zone would not allow development that would generate more trips than the current zoning of Exclusive Farm Use (EFU). However, the provision and OARs do not eliminate the need to look at the larger transportation system impacts. You need to also look at the provisions of OAR 660-024-0060(8) with regard to "Boundary Location Alternatives Analysis" which requires evaluation and comparison of 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. 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, and other major improvements on existing roadways.

The County studied the transportation needs on State highways within Marion County in 1998 and again in the 2005 Rural Transportation System Plan (RTSP). The RTSP identifies several needs and future capacity issues on Hwy 99E in the Hubbard area that suggest Hwy 99E cannot handle the additional traffic that could be generated by a UGB expansion without significant capacity improvements. Even though it is not a County road, it is a very important regional facility that cannot be ignored.

To Suzanne Dufner, Hubbard City Planner  
From Karen G. Odenthal, Transportation Planner  
RE: Hubbard Urban Growth Boundary Expansion  
July 12, 2007

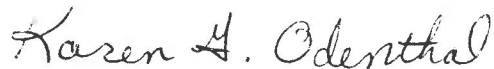
Page 3

The potential issues identified in the Marion County RTSP should be considered as part of your evaluation in regard to the comparative boundary alternative analysis. Any new identified transportation need (such as a new collector to serve a proposed area, or additional lanes on an existing facility) should be addressed in your Transportation System Plan (TSP). Your TSP should also address an equitable methodology for requiring individual parcels being rezoned and annexed to participate financially in solving the larger regional transportation needs.

More detailed transportation analyses will be required at the time of zone change and/or annexation for each affected parcel to identify specific impacts and mitigations.

Thank you for the opportunity to comment on the expansion of the City of Hubbard's Urban Growth Boundary. If you have any questions, please contact me at 503-588-5036.

Sincerely,



Karen G. Odenthal  
Transportation Planner

KO:nv

c: Mike McCarthy  
Les Sasaki  
Barb Young  
Don Newell  
Dan Fricke, ODOT

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# Marion County OREGON

## PUBLIC WORKS

RECEIVED  
JUN 7 2007

MID WILLAMETTE VALLEY  
COUNCIL of GOVERNMENTS

BOARD OF  
COMMISSIONERS  
Sam Brentano  
Janet Carlson  
Patti Miine

June 4, 2007

DIRECTOR  
James V. Sears, P.E.

Mark Fancey  
Hubbard City Planner  
Mid-Willamette Valley Council of Governments  
105 High Street SE  
Salem, OR 97301-3667

ADMINISTRATION

BUILDING  
INSPECTION

DOG CONTROL

EMERGENCY  
MANAGEMENT

RE: Hubbard Urban Growth Boundary Expansion

ENGINEERING

Dear Mr. Fancey:

ENVIRONMENTAL  
SERVICES

This letter is in response to your request for comments regarding the proposed Hubbard UGB expansion, specifically regarding impacts to Marion County transportation facilities. Our comments are based on the information provided and may be revised as additional information becomes available.

OPERATIONS

PARKS

PLANNING

SURVEY

The property north of the existing UGB proposed for inclusion in the UGB is a logical extension of the urban area given the layout of existing streets. There are stub streets immediately adjacent to the property. Since these streets are under city jurisdiction, the County road network is not directly affected by the UGB expansion in this area.

The properties adjacent to Schmidt Lane NE do not appear to be adequately served by stub streets and connecting streets from the City. Development in these areas would be isolated from the larger community and would predominately be served by Highway 99E. The County encourages improving connectivity in the community rather than directing all traffic to a single roadway, especially an arterial. A north-south connector in this area should be identified as a need. Since Schmidt Lane will serve predominately urban traffic and function more as a city street than a rural road, it is expected that the City will take over jurisdiction upon annexation of adjacent properties. This should include the westerly portion of Schmidt Lane outside of the UGB to provide continuity of maintenance jurisdiction.

The properties east of the existing UGB do have some stub streets connecting them to existing city streets. However, it is anticipated that development in this area will increase the traffic on Whisky Hill Road. Whisky Hill Road is not built to urban standards and will require substantial

To Mark Fancey, Hubbard City Planner  
From Cynthia J. Schmitt, P.E., Transportation Engineer  
RE: Hubbard Urban Growth Boundary Expansion  
June 4, 2007

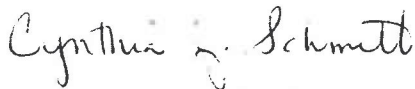
Page 2

improvements, including the addition of bike lanes, curbs, sidewalks, and turning lanes as needed. The Whisky Hill Road right-of-way should be included within the UGB, including that portion of the road between G Street and Painter Loop. Upon annexation of the adjacent properties, the City is expected to take over jurisdiction of Whisky Hill Road, including all remaining pieces of the road within, or adjacent to, the new city limits. This is to provide consistent maintenance responsibility and a single jurisdictional change from City to County.

In accordance with OAR 660-012-0060(1), it is expected that a Transportation Study will be performed as part of the UGB proposal. A reasonable worst-case scenario should be assumed for development on all parcels proposed in the UGB expansion. County staff are available to assist in scoping the required analysis with the City's consultant. The County will then review the study and comment on additional impacts to roadways under County jurisdiction at that time.

Thank you for the opportunity to comment on the expansion of the City of Hubbard's Urban Growth Boundary. If you have any questions, please contact Karen Odenthal or me at 503-588-5036.

Sincerely,



Cynthia J. Schmitt, P.E.  
Transportation Engineer

KO:nv

c: Mike McCarthy  
Les Sasaki  
Barb Young  
Don Newell

G:\Engineering\Transportation\TrafAdministration\Correspondence\Recent\Hubbard UGB expansion comments 2\_1.doc

## **Exhibit A-3**

# **Comments on transportation impacts Oregon Department of Transportation**



# Oregon

Theodore R. Kulongoski, Governor

## Department of Transportation

### Region 2 Headquarters

455 Airport Road SE Building B

Salem, Oregon 97301-5395

Telephone (503) 986-2600

Fax (503) 986-2630

June 8, 2007

Mr. Mark Fancey, City Planner  
Mid-Willamette Valley Council of Governments  
105 High Street SE  
Salem, OR 97301

RECEIVED  
JUN 11 2007

MID WILLAMETTE VALLEY  
COUNCIL OF GOVERNMENTS

**SUBJECT: Hubbard UGB Expansion**

Dear Mark:

Thank you for May 17, 2007 letter referring the proposed City of Hubbard urban growth boundary (UGB) expansion proposal to the Oregon Department of Transportation (ODOT) for review and comment. ODOT staff have reviewed the proposal and we offer the following comments.

Generally, we have no objection to the proposed UGB expansion areas or land uses. They appear to be logical extensions of the city and the proposed uses appear to be consistent with adjacent land uses. As the City intends to apply comprehensive plan designations to these properties, the City is expected to demonstrate compliance with OAR 660-012-0060 (Transportation Planning Rule – TPR) and make appropriate findings. At this level, as it relates to OR 99E, we believe this can be accomplished by calculating the number of PM peak hour trips that will be generated by the proposed designations (using standard trip generation factors provided by the Institute of Transportation Engineers) and compare that to the peak hour volume on the highway. The current PM peak volume on OR 99E at G Street in the city is estimated to be 1,900 vehicles. Given the level of detail currently available, we believe this methodology will produce the data the City needs to make the appropriate TPR findings.

ODOT requests that appropriate conditions be applied to this action that would require the preparation of a transportation impact analysis (TIA) and construction of any measures necessary to ensure consistency with ODOT requirements for OR 99E as part of an annexation/zone change application for any of the parcels included in this UGB amendment.

As a final matter, we note that several of the parcels proposed for expansion on Map 041W33DC at the south end of the City are adjacent to OR 99E and straddle Schmidt Lane, a city street. A land use designation of 'Industrial' is proposed for



*Mr. Mark Fancey  
Mid-Willamette Valley Council of Governments  
June 8, 2007  
Page 2 of 2*

these parcels. We would request that appropriate conditions be placed on this action indicating that no direct access to OR 99E will be permitted from these future industrial parcels.

This letter should be included in the record as ODOT testimony. ODOT should be considered a party to the hearing and be entitled to notices of future hearings, or hearing continuances or extensions. Please provide me with a copy of the County's decision, including findings and conditions of approval.

Sincerely,

A handwritten signature in black ink, appearing to read "Daniel L. Fricke", with a long horizontal flourish extending to the right.

Daniel L. Fricke  
Senior Transportation Planner

DLF:



# Oregon

Theodore R. Kulongoski, Governor

## Department of Transportation

### Region 2 Headquarters

455 Airport Road SE Building B

Salem, Oregon 97301-5395

Telephone (503) 986-2600

Fax (503) 986-2630

July 30, 2007

Ms. Suzanne Duffner, City Planner  
Mid-Willamette Valley Council of Governments  
105 High Street SE  
Salem, OR 97301

### **SUBJECT: Hubbard UGB Expansion**

Dear Suzanne:

Thank you for May 17, 2007 letter referring the proposed City of Hubbard urban growth boundary (UGB) expansion proposal to the Oregon Department of Transportation (ODOT) for review and comment. This letter supplements our previous comment letter on the subject dated June 8, 2007. Except as superseded here, our previous comments remain applicable.

Our previous letter referred to OAR 660-012-0060 and the requirement that the City needs to demonstrate that the proposed amendment would not adversely impact area transportation facilities. City staff noted, in response, that the provisions of OAR 660-024-0020(1)(d) apply. That section states:

*(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.*

You have indicated that the City intends to retain the existing zoning at this time and it will be responsibility of a future developer to process an annexation request along with appropriate zoning designations. With that understanding, and the City including a provision in this UGB amendment that compliance with OAR 660-012-0060 will be required as part of a future zone change application, ODOT concurs with the City staff recommendation. ODOT requests that appropriate conditions be applied to this action that would require the preparation of a transportation impact analysis (TIA) and construction of any measures necessary to ensure consistency


*Ms. Suzanne Duffner  
Mid-Willamette Valley Council of Governments  
July 30, 2007  
Page 2 of 2*

with ODOT requirements for OR 99E as part of an annexation/zone change application for any of the parcels included in this UGB amendment.

Marion County, in a letter to the City dated July 12, 2007, points out that the County's Rural Transportation System Plan (RTSP) identifies the need for long-term capacity improvements on OR 99E in the Hubbard area. We agree that these needs should be identified in the City's Transportation System Plan. Further, the City should develop and adopt a funding mechanism to ensure an equitable distribution of costs for any improvements that are necessary as a result of this UGB expansion proposal.

This letter should be included in the record as ODOT testimony. ODOT should be considered a party to the hearing and be entitled to notices of future hearings, or hearing continuances or extensions. Please provide me with a copy of the County's decision, including findings and conditions of approval.

Sincerely,



Daniel L. Fricke  
Senior Transportation Planner

DLF:

cc: Karen Odenthal, Marion County

**Exhibit A-4**

**Comments on public facilities  
City Engineer and Public Works Superintendent**

Attention: Suzanne Dufner  
Regarding: HUBBARD UGB EXPANSION – BOUNDARY COMMENTS  
Date: September 17, 2007

The City of Hubbard Department of Public Works has reviewed the 7 Study areas for availability of public services (water, sanitary sewer, storm drainage, and access) and has the following comments;

Study Area 1: All required public services can be made available to the subject property. A large percentage of the property has sanitary sewer service available by gravity sewers. The southerly portion of the property can be served by extension of a public sewer line through the industrial property to the west. The northerly portion can be served by sewers in the Whiskey Hill Road area.

Study Area 3: The existing industrial pump station can be modified to accept additional sewer flows, however the areas between Mill Creek and Little Bear Creek will require and additional pump station.

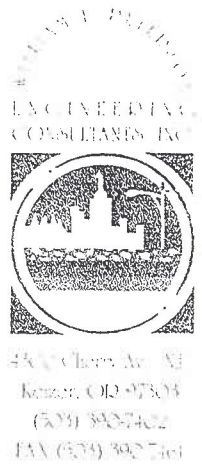
Study Area 4: Most of this property will require a new pump station which will connect to an existing sewer trunk line in D Street.

Study Area 5: A large percentage of this area can be served by gravity from an existing sanitary sewer trunk which crosses the intersection of 5<sup>th</sup> and Baines.

Study Area 6: A sanitary sewer trunk line in Baines located west of the railroad can provide service to most of this area.

Study Area 7: The northerly portion of this area could also be served by the sewer trunk line in Baines west of the railroad. The middle section of this area and most of the southerly portion can be served by existing sanitary sewers located in Casteel Street and Oakridge Lane.

Actual field topography will be required to determine the extent that all of the study areas can be served by gravity.



July 2, 2007

Jaime Estrada, Public Works Superintendent  
City of Hubbard  
3720 2nd Street  
P.O. Box 380  
Hubbard, OR 97032-0380

Re: June 20, 2007 Memo from Mark Fancy  
Urban Growth Boundary Expansion

Jaime:

I have reviewed the referenced memo and the City's Master Plans for Water, Sanitary Sewer, Storm Drainage, and Transportation. I find that the City has or can make available the infrastructure required to support the UGB Expansion.

If you have any questions regarding my finding, please call me at 503.390.7402.

Sincerely,

William I. Peterson, P.E.  
City Engineer

# OFFICE MEMORANDUM

TO: Suzanne Dufner, City Planner  
DATE: July 15, 2007  
FROM: Jaime Estrada, Superintendent  
RE: June 20, 2007 Memo from Mark Fancey

---

After reviewing all the information pertaining to the proposed UGB expansion -- following is my assessment on the City's ability to provide service to the proposed UGB.

## 12.5 Acres Tax Lot #700

- Water, sewer and possible storm lines are abutting this lot.
- Water line size 8' inch on Kurth and 8" inch water main on North 3<sup>rd</sup> Street.
- Sewer line on Kurth is an 8" and a 8" inch sewer line on North 3<sup>rd</sup> street
- May need a lift station to serve the northern part of lot #700.

## 67.2 Acres Tax Lot #400

- Water mains are located at Casteel Street (8"), Oakridge Street (6"), Whiskey Hill Rd. (10") and Pacific Hwy. 99E (10") on the West side of Pacific Hwy. 99E.
- Sewer lines (8" inch) are located on Casteel, Oakridge and Oak Streets, and Pacific Hwy 99E.
- A sewer lift station will more than likely be needed to serve this area.
- Storm water -- an open ditch on Whiskey Hill Road discharges in an Easterly direction into the Pudding River.

## 11.7 Acres Tax Lot #'s 400, 500, 800 and 900

- A 10" inch water main on Pacific Hwy 99E
- A 10" sewer main on Pacific Hwy 99E
- Storm -- an open ditch (Bear Creek) flowing in a Westerly direction.

## According to the Wastewater upgrade completed in November 2006 by Kennedy Jenks Consultants.

- The Wastewater Facilities has a capacity to serve a population of 3826. I believe this figure is very conservative. An upgrade may be needed to create more capacity.
- Sewer mains downstream from the proposed expansion may have to be enlarged. An engineer study will have to be done to determine the extent of these modifications.

## According to the Water Master Plan completed December 10, 1996 by KPFF Consulting Engineers.

The Water Treatment facilities can serve a population of approximately 3700 people. I believe this figure is also very conservative. An upgrade may be needed to create more capacity. (New well)

The transportation impact will be minimal for most of the proposed expansion. Each proposed section will have its own street network and connect to existing streets.

## **Exhibit A-5**

### **Marion County Assessor Maps**

The maps are in the following order as presented in the report:

Assessor Map 41W34CC

Assessor Map 41W27CD

Assessor Map 41W34B

Assessor Map 41W33DC

Assessor Map 41W34CB



**LEGEND**

**LINE TYPES**

TAX LOT BOUNDARY	OLD PROPERTY LINE
ROAD RIGHT-OF-WAY	VACATED RIGHT-OF-WAY
RAILROAD	RAILROAD RIGHT-OF-WAY
STREAM, LAKE, ETC. TAX LOT BOUNDARY	STREAM, LAKE, ETC. NON-BOUNDARY
SUBDIVISION BOUNDARY	PARTITION PLAT BDT.
TAX CODE BOUNDARY	EASEMENT

**SYMBOL TYPES**

D.L.C.	
CONTROL POINTS	
SURVEY MONUMENTS	
C.L.D. CORNERS	
SECTION	1/4 SEC.    1/8 SEC.

**NUMBERS**

TAX CODE NO.  
000 00 00 0

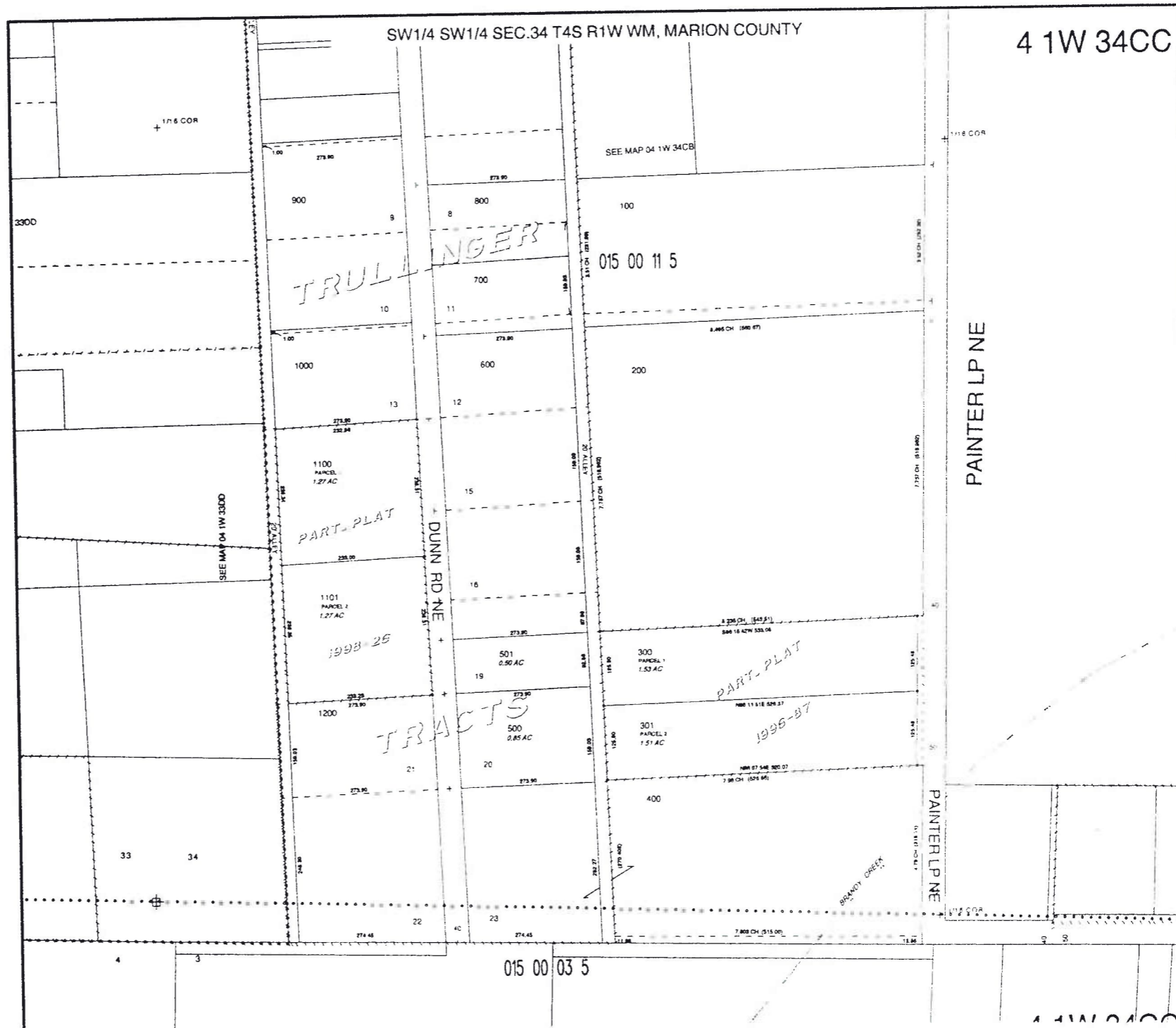
ACREAGE - ALL ACREAGES EXCLUDE ANY PORTION THAT MAY LIE WITHIN THE INDICATED PUBLIC RIGHT OF WAYS.

TICK MARKS - WHEN A TICK MARK IS INDICATED ON THE EXTENSION OF A LINE, THEN THE DIMENSION GOES TO THE TICK MARK. GENERALLY THIS IS USED WHEN DIMENSIONS GO INTO PUBLIC RIGHT OF WAYS.



ARROWS ARE USED WITH DIMENSIONS IN AREAS OF GREATER COMPLEXITY.

**NOTICE:** This map was created for Assessor's Office use ONLY.



**LEGEND**

**LINE TYPES**

TAX LOT BOUNDARY	OLD PROPERTY LINE
ROAD RIGHT-OF-WAY	VACATED RIGHT-OF-WAY
RAILROAD	RAILROAD RIGHT-OF-WAY
STREAM, LAKE, ETC. TAX LOT BOUNDARY	STREAM, LAKE, ETC. NON-BOUNDARY
SUBDIVISION BOUNDARY	PARTITION PLAT BDT
TAX CODE BOUNDARY	EASEMENT

**SYMBOL TYPES**

DLG		
CONTROL POINTS		
SURVEY MONUMENTS		
CLL COURSE		
SECTION	1/4 SEC	1/16 SEC

**NUMBERS**

TAX CODE NO.  
000 00 00 0

ACREAGE - ALL ACREAGES EXCLUDE ANY PORTION THAT MAY LIE WITHIN THE INDICATED PUBLIC RIGHT OF WAYS.

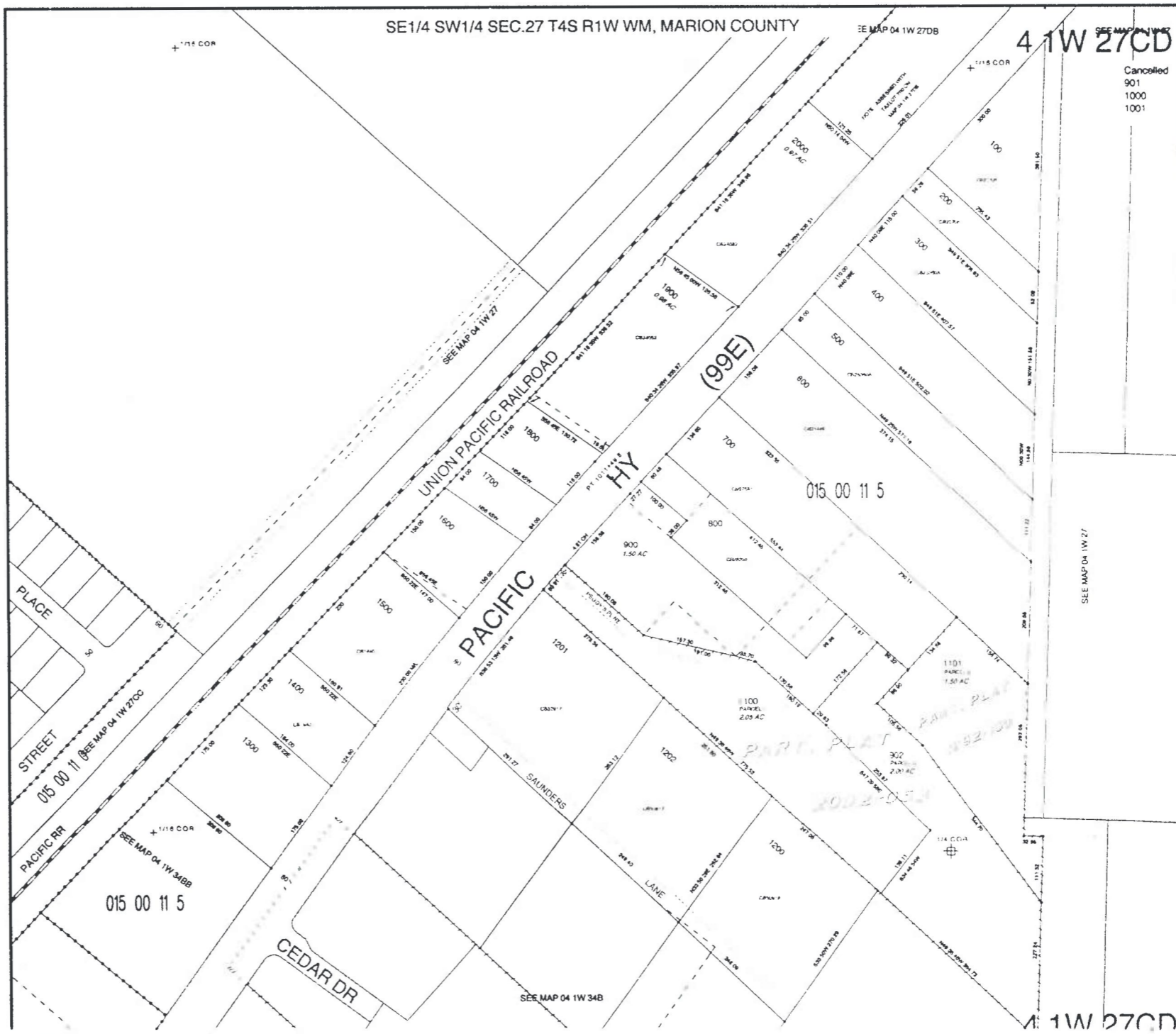
TICK MARKS - WHEN A TICK MARK IS INDICATED ON THE EXTENSION OF A LINE, THE DIMENSION GOES TO THE TICK MARK. GENERALLY THIS IS USED WHEN DIMENSIONS GO INTO PUBLIC RIGHT OF WAYS.

ARROWS ARE USED WITH DIMENSIONS IN AREAS OF GREATER COMPLEXITY.

**NOTICE:** This map was created for Assessor's Office use ONLY.



SCALE 1" = 100'



**LEGEND**

**LINE TYPES**

TAX LOT BOUNDARY	OLD PROPERTY LINE
ROAD RIGHT-OF-WAY	VACATED RIGHT-OF-WAY
RAILROAD	RAILROAD RIGHT-OF-WAY
STREAM, LAKE, ETC.	STREAM, LAKE, ETC.
TAX LOT BOUNDARY	NON-BOUNDARY
SUBDIVISION BOUNDARY	PARTITION PLAT BOT.
TAX CODE BOUNDARY	EASEMENT

**SYMBOL TYPES**

D.L.C.	
CONTROL POINTS	
SURVEY MONUMENTS	
C.L.O. CORNERS	
SECTION	
1/4 SEC.	
1/8 SEC.	

**NUMBERS**

TAX CODE NO.  
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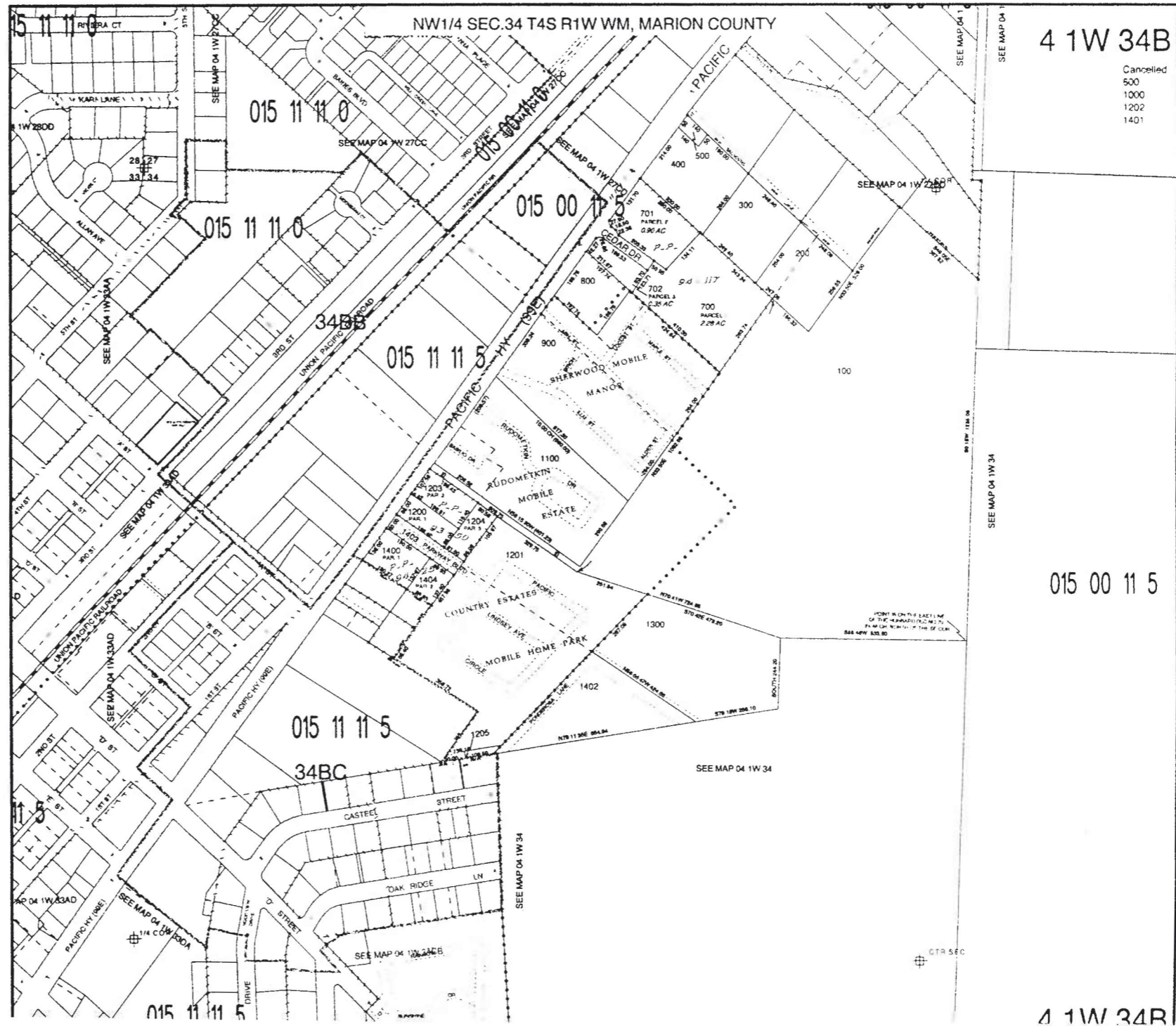
ACREAGE - ALL ACREAGES EXCLUDE ANY PORTION THAT MAY LIE WITHIN THE INDICATED PUBLIC RIGHT OF WAYS.

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ARROWS ARE USED WITH DIMENSIONS IN AREAS OF GREATER COMPLEXITY.

**NOTICE:** This map was created for Assessor's Office use ONLY.



4 1W 34B

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500  
1000  
1202  
1401

015 00 11 5

4 1W 34R

**LEGEND**

**LINE TYPES**

TAX MAP BOUNDARY	OLD PROPERTY LINE
ROAD RIGHT-OF-WAY	VACATED RIGHT-OF-WAY
RAILROAD	RAILROAD RIGHT-OF-WAY
STREAM, LAKE, ETC. TAX MAP BOUNDARY	STREAM, LAKE, ETC. NON-BOUNDARY
SUBDIVISION BOUNDARY	PARTITION PLAT BDT
TILE CURB BOUNDARY	CLASCHMIT

**SYMBOL TYPES**

B.L.C.	⊙		
CONTROL POINTS	▲		
PROPERTY MONUMENTS	•		
S.L.A. CORNERS	+		
SECTION	1/4 SEC	1/8 SEC	1/32 SEC
	⊕	⊕	⊕

**NUMBERS**

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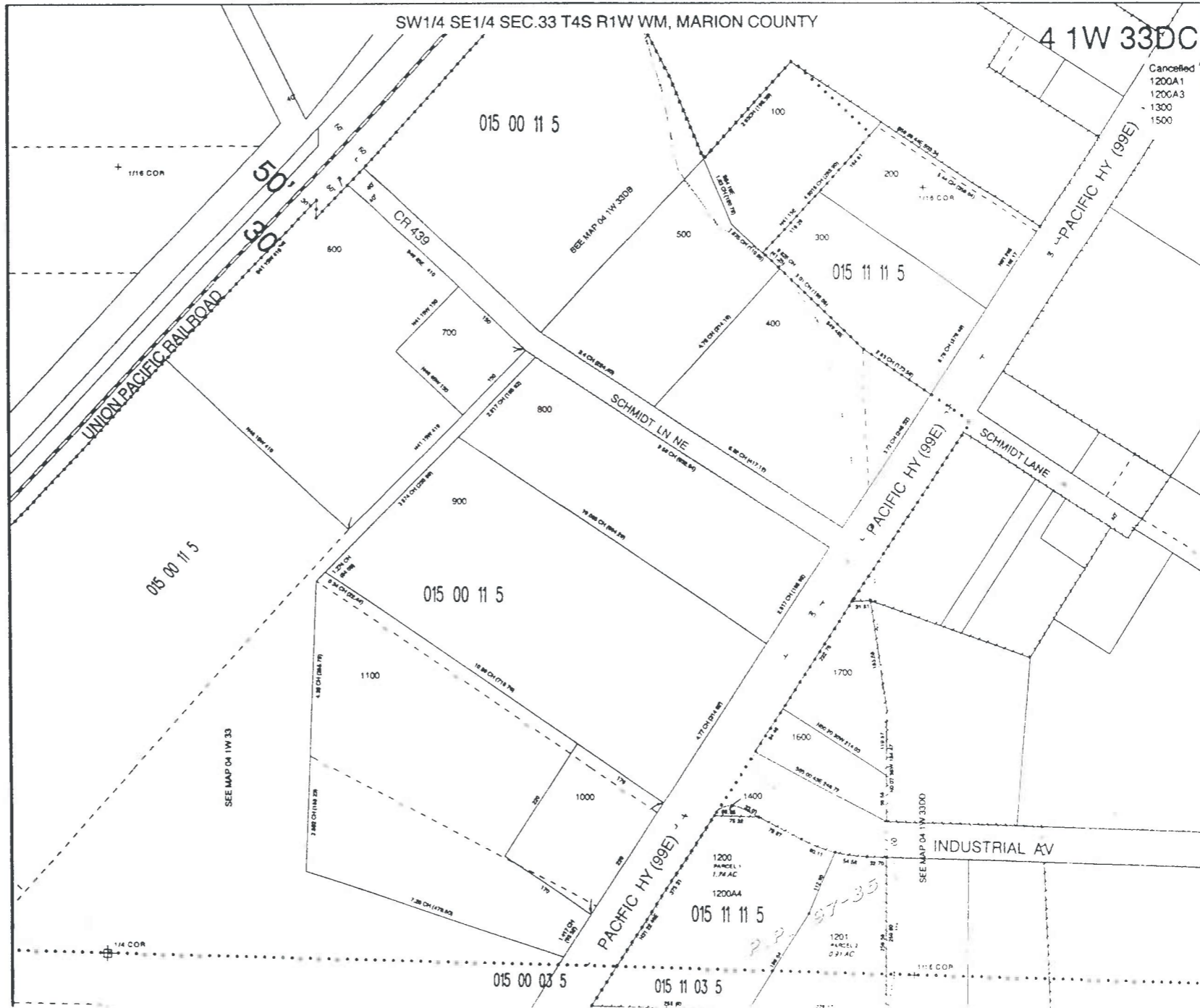
ACRES - ALL ACRES EXCLUDE ANY PORTION THAT MAY LIE WITHIN THE INDICATED PUBLIC RIGHT OF WAY.

TICK MARKS - WHEN A TICK MARK IS INDICATED ON THE EXTENSION OF A LINE, THEN THE DIMENSION GOES TO THE TICK MARK. GENERALLY THIS IS USED WHEN DIMENSIONS GO INTO PUBLIC RIGHT OF WAY.



ARROWS ARE USED WITH DIMENSIONS IN AREAS OF GREATER COMPLEXITY

**NOTICE:** This map was created for Assessor's Office use ONLY.



LEGEND

LINE TYPES

- TAX LOT BOUNDARY      OLD PROPERTY LINE
- ROAD RIGHT-OF-WAY      VACATED RIGHT-OF-WAY
- RAILROAD      RAILROAD RIGHT-OF-WAY
- STRAKE LANE ETC. TAX LOT BOUNDARY      STRAKE LANE ETC. NON-BOUNDARY
- SUBDIVISION BOUNDARY      PARTITION PLAT BOUNDARY
- TAX CODE BOUNDARY      EXCEPT

SYMBOL TYPES

- OLC
- CENTRAL POINTS
- SURVEY BOUNDARIES
- CLA CORNERS
- SECTION      1/4 SEC.      1/2 SEC.      3/4 SEC.
- 1/4 COR.      1/2 COR.      3/4 COR.

NUMBERS

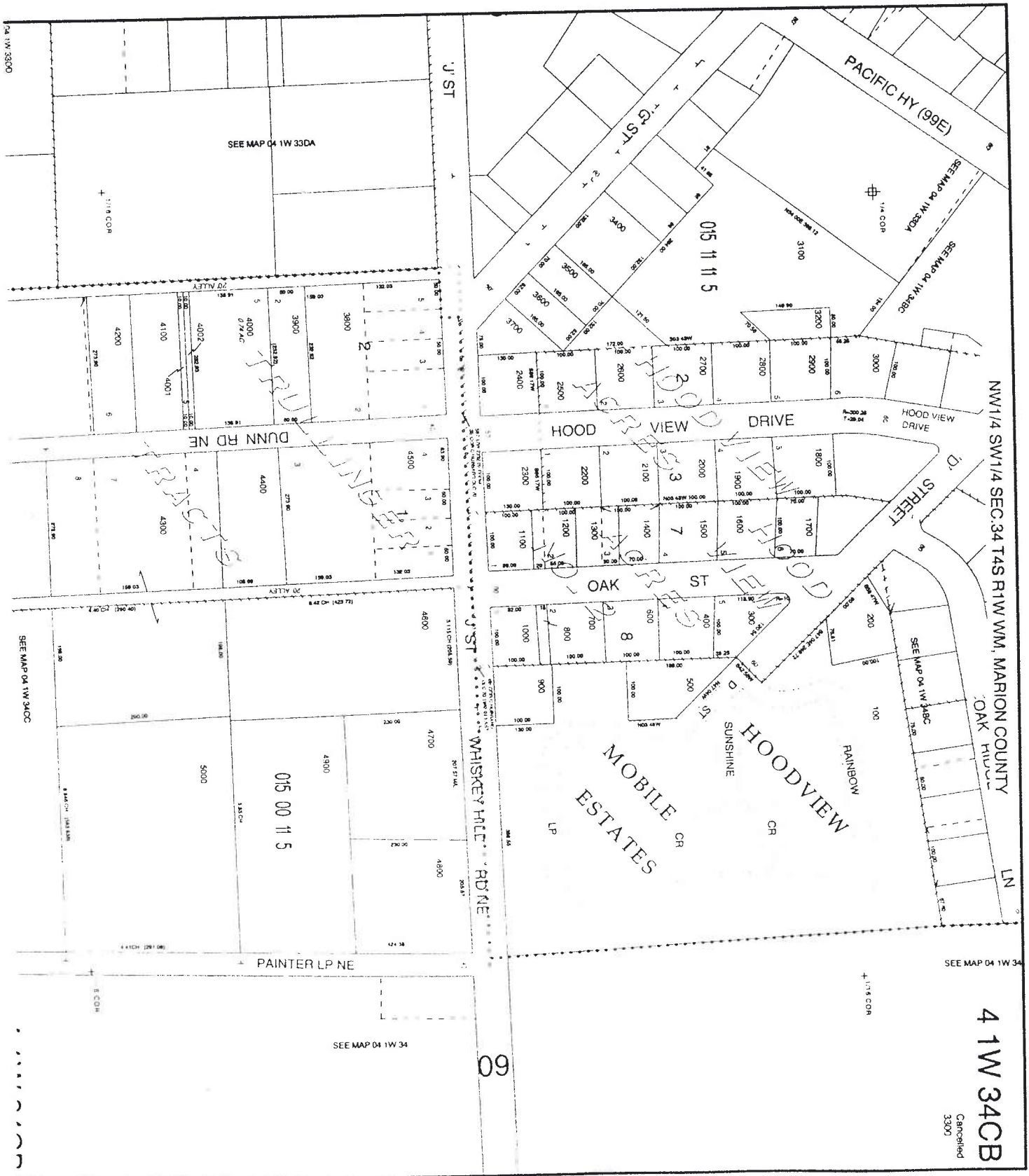
TAX CODE NO. 000 00 00 0

ABSTRACT - ALL ABSTRACTS EXCLUDING PART PORTION THAT MAY LIE WITHIN THE INDICATED PUBLIC RIGHT OF WAY.

TICK MARKS - WHEN A TICK MARK IS INDICATED ON THE EXTENSION OF A LINE, THE TICK MARK CORRESPONDS TO THE TICK MARK, GENERALLY THIS IS USED WHEN DIMENSIONS CO NOT PUBLIC RIGHT OF WAY.

ABOVE ARE USED WITH DIMENSIONS IN AREAS OF GREATER COMPLEXITY.

NOTICE: This map was created for Assessor's Office use ONLY.



4 1W 34CB

Cancelled  
3300