

Department of Land Conservation and Development

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NOTICE OF ADOPTED CHANGE TO A COMPREHENSIVE PLAN OR LAND USE REGULATION

Date: 10/10/2014

Jurisdiction: City of Coburg

Local file no.: Ordinance A-131-Q

DLCD file no.: 002-14

The Department of Land Conservation and Development (DLCD) received the attached notice of adopted amendment to a comprehensive plan or land use regulation on 10/09/2014. A copy of the adopted amendment is available for review at the DLCD office in Salem and the local government office.

Notice of the proposed amendment was submitted to DLCD 35 days prior to the first evidentiary hearing.

Appeal Procedures

Eligibility to appeal this amendment is governed by ORS 197.612, ORS 197.620, and ORS 197.830. Under ORS 197.830(9), a notice of intent to appeal a land use decision to LUBA must be filed no later than 21 days after the date the decision sought to be reviewed became final. If you have questions about the date the decision became final, please contact the jurisdiction that adopted the amendment.

A 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).

If the amendment is not appealed, it will be deemed acknowledged as set forth in ORS 197.625(1)(a). Please call LUBA at 503-373-1265, if you have questions about appeal procedures.

DLCD Contact

If you have questions about this notice, please contact DLCD's Plan Amendment Specialist at 503-934-0017 or plan.amendments@state.or.us

DLCD FORM 2



NOTICE OF ADOPTED CHANGE TO A COMPREHENSIVE PLAN OR LAND USE REGULATION

FOR DLCD USE

File No.: 002-14 {22256}

Received: 10/9/2014

Local governments are required to send notice of an adopted change to a comprehensive plan or land use regulation no more than 20 days after the adoption. (See OAR 660-018-0040). The rules require that the notice include a completed copy of this form. This notice form is not for submittal of a completed periodic review task or a plan amendment reviewed in the manner of periodic review. Use Form 4 for an adopted urban growth boundary including over 50 acres by a city with a population greater than 2,500 within the UGB or an urban growth boundary amendment over 100 acres adopted by a metropolitan service district. Use Form 5 for an adopted urban reserve designation, or amendment to add over 50 acres, by a city with a population greater than 2,500 within the UGB. Use Form 6 with submittal of an adopted periodic review task.

Jurisdiction: City of Coburg

Local file no.: A-199-D (Previously A-131-Q)

Date of adoption: 9/12/14

Date sent: 10/9/2014

Was Notice of a Proposed Change (Form 1) submitted to DLCD?

Yes: Date (use the date of last revision if a revised Form I was submitted): 5/6/14

Is the adopted change different from what was described in the Notice of Proposed Change? If yes, describe how the adoption differs from the proposal:



The amount of residential land added to the UGB was reduced from 169 acres to 148 acres; with 28 fewer acres of agricultural land included. The 105 acres of land designated Highway Commercial was re-designated to Light Industrial.

Local contact (name and title): Petra Schuetz, City Administrator

Phone: 541-682-7871

E-mail: petra.schuetz@ci.coburg.or.us

Street address: P.O. Box 8316

City: Coburg

Zip: 97408-

PLEASE COMPLETE ALL OF THE FOLLOWING SECTIONS THAT APPLY

For a change to comprehensive plan text:

Identify the sections of the plan that were added or amended and which statewide planning goals those sections implement, if any:

The Land Use Planning (Goal 2) section of the Coburg Comprehensive Plan was amene to adopt, by policy, definitions for Medium Density Residential, High Density Residential and Mixed Use plan designations.

For a change to a comprehensive plan map:

Identify the former and new map designations and the area affected:

A goal exception was required for

Change from Traditional Residential to Mixed Use 10 acres.

this change.

Change from

acres.

acres.

A goal exception was required for this

change.

Change from

A goal exception was required for this

change.

Change from

to

to

to

A goal exception was required for this change. acres.

Location of affected property (T, R, Sec., TL and address): Tax lot 105, 16-03-33-00 (No goal exception required)

The subject property is entirely within an urban growth boundary \sqrt{e} S

The subject property is partially within an urban growth boundary

If the comprehensive plan map change is a UGB amendment including less than 50 acres and/or by a city with a population less than 2,500 in the urban area, indicate the number of acres of the former rural plan designation, by type, included in the boundary.

Exclusive Farm Use – Acres: 167.5 Non-resource – Acres: Forest – Acres: Marginal Lands – Acres:

Rural Residential – Acres: 88.9 Natural Resource/Coastal/Open Space – Acres:

Rural Commercial or Industrial – Acres: Other: – Acres:

If the comprehensive plan map change is an urban reserve amendment including less than 50 acres, or establishment or amendment of an urban reserve by a city with a population less than 2,500 in the urban area, indicate the number of acres, by plan designation, included in the boundary.

Exclusive Farm Use – Acres: Non-resource – Acres: Forest – Acres: Marginal Lands – Acres:

Rural Residential – Acres: Natural Resource/Coastal/Open Space – Acres:

Rural Commercial or Industrial – Acres: Other: – Acres:

For a change to the text of an ordinance or code:

Identify the sections of the ordinance or code that were added or amended by title and number:

The Land Use Planning (Goal 2) section of the Coburg Comprehensive Plan was amene to adopt, by policy, definitions for Medium Density Residential, High Density Residential and Mixed Use plan designations.

For a change to a zoning map:

Identify the former and new base zone designations and the area affected:

Change from to Acres:
Change from to Acres:
Change from to Acres:
Change from to Acres:

Identify additions to or removal from an overlay zone designation and the area affected:

Overlay zone designation: Acres added: Acres removed:

Location of affected property (T, R, Sec., TL and address):

List affected state or federal agencies, local governments and special districts: Lane County, Coburg Fire District,

Identify supplemental information that is included because it may be useful to inform DLCD or members of the public of the effect of the actual change that has been submitted with this Notice of Adopted Change, if any. If the submittal, including supplementary materials, exceeds 100 pages, include a summary of the amendment briefly describing its purpose and requirements.

COBURG ORDINANCE A-199-D

AN ORDINANCE EXPANDING THE COBURG URBAN GROWTH BOUNDARY, CREATING MEDIUM AND HIGH DENSITY RESIDENTIAL AND MIXED USE PLAN DESIGNATIONS, AND REQUIRING THE DEVELOPMENT OF TAX LOT 105, LANE COUNTY ASSESSOR'S MAP 16–03–33–00 TO BE SUBJECT TO CHAPTER XV OF THE COBURG ZONING CODE

WHEREAS, the City of Coburg wishes to update its Comprehensive Plan to reflect current and future needs for land, housing and economic opportunities and to justify the expansion of the wban growth boundary to accommodate these needs; and

WHEREAS, an urbanization study update was created in April of 2010 that reflected a planning period from 2010 to 2030 but the update has not yet been adopted by the Coburg City Council; and

WHEREAS, the urbanization study update was modified in 2014 to reflect a planning period from 2014 to 2034 to satisfy requirements of Statewide Planning Goals #2 and #14; and

WHEREAS, the City Council wishes to implement recommendations made by the Coburg Urbanization Study regarding expansion of the Coburg Urban Growth Boundary and for land uses on tax lot 105, Lane County Assessor's Map 16-03-33-00.

THE CITY OF COBURG ORDAINS AS FOLLOWS:

- Section 1. The City Council wishes to encourage the development of tax lot 105, Lane County Assessor's Map 16-03-33-00 by designating this property for mixed use. At least eight acres of this parcel may be developed for medium density residential at an average density often units per acre. Development must be implemented through a Master Planning process that allows for a gradual transition of Medium Density Residential east to Traditional Residential densities west and the creation of a new access road for the property along Pearl Street at the west. Until a Mixed-Use Zoning District is adopted development within the Mixed Use Designation shall be subject to the Master Planned Developments requirements of Chapter XV of the Coburg Zoning Ordinance.
- Section 2. In addition to the properties identified herein, the properties listed in Exhibit A to this Ordinance are hereby added to the Coburg Urban Growth Boundary.
- Section 3. The Cohurg Comprehensive Plan is hereby amended by adding the following three policies to its Goal 2: Land Use Planning section:
- "Policy 18: Medium Density Residential The Medium Density Residential designation is intended to guide the development of new, livable neighborhoods located outside the historic and traditional core of the Coburg at an average residential density of 10 units per acre.

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- Policy 19: High Density Residential The lligh Density Residential designation is intended to guide the development of new, livable neighborhoods located outside the historic and traditional core of the Coburg at an average residential density of 14 units per acre.
- Policy 20: Mixed Use The Mixed Use designation allows commercial and residential development with density ranges of the latter being above 12 dwelling units per acre with an average overall density of 15 dwelling units per acre."
- Section 4. The Coburg Comprehensive Plan Diagram is hereby amended to add two acres of property designated as High Density Residential near the southwest corner of Tax Lot 500, Lane County Assessor's Map 16-03-28-00, adjacent to North Coburg Road on the East and adjacent to the City Limits on the South.
- Section 5. The Coburg Comprehensive Plan Diagram is hereby amended to add up to 15 acres of property designated as Medium Density Residential near the southwest corner of Tax Lot 500, Lanc County Assessor's Map 16-03-28-00, adjacent to the north and west of the High Density Residential land described in Section 4, above.
- Section 6. Properties added to the Coburg Urban Growth Boundary by this Ordinance but not otherwise specifically assigned a plan designation by this Ordinance shall be designated as Traditional Residential.
- Section 7. Tax Lot 202, Assessor's Map 16-03-34-00 shall be added to the Coburg Urban Growth Boundary and shall be designated Light Industrial on the Comprehensive Plan Diagram. The Coburg Comprehensive Plan is hereby amended to add a Policy 28 to Goal 9: Economy of the City that reads:
- "Policy 28: In order to meet a regional industrial need, properties with a Light Industrial designation located on the east side of Interstate 5 shall not be partitioned into parcels smaller than 20 acres."
- Section 8. A revised Comprehensive Plan Diagram, attached to by reference as Exhibit B, is hereby adopted.
- Section 9. The Coburg Urbanization Study Update (April 2010) and Addendum (2014), attached to this Ordinance as Exhibits C and D, are hereby made a part of this Ordinance.
- Section 10. Findings of fact in support of the expansion of the Coburg Urban Growth Boundary, attached to this Ordinance as Exhibit E, are hereby made a part of this Ordinance.
- Section 11. Severability. The sections and subsections of this ordinance are severable. The invalidity of any section or subsection shall not affect the validity of the remaining sections and subsections.
- Section 12. Conflicts. In the event that sections or provisions of this ordinance conflicts with other ordinances, then the standards established by this ordinance shall take priority.

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The foregoing ordinance was, by City Council consent, after public notice, public hearing and
Council deliberations, put to a vote on September 9, 2014 the results of which were:

YES: 5

NO: 0

ABSTAIN: None

Passed: Yes

Rejected: ~-

SIGNED AND APPROVED this 12 day of September, 2014

Mayor

ATTEST:

City Recorder

EXHIBIT E

Findings in Support of Ordinance A-199-D

The 2010 Urbanization Study Update, as modified in 2014, recommends that 169 acres be added to the Coburg Urban Growth Boundary to meet a 20-year forecasted need for residential land. These acres are proposed to be obtained from Study Areas 1, 2, 5 and 6. The Urbanization Study Update also supports the conclusion of the 2004 Urbanization Study that one or two 20-acre parcels are necessary for economic opportunity needs. The Update proposes that this land be provided by the inclusion of Study Area 3 in the Coburg Urban Growth Boundary.

LOCAL EXPANSION CRITERIA

Coburg has undertaken a number of expansion-related planning processes in the last decade. These include the Coburg Crossroads visioning process of 2003, the 2004 Urbanization study and periodic review effort, the 2005 update of the Comprehensive Plan and the 2010 Update of the Urbanization Study. The policies that were incorporated into the 2005 comprehensive plan update are a reflection of extensive efforts to summarize the City's ideals, including those related to the City's growth. Below are listed a few of these guiding policies of the Coburg Comprehensive Plan that are specifically related to outward expansion:

Urbanization Goal Policies

<u>Policy 1:</u> The City shall preserve urbanizable land and provide for orderly, efficient development by controlling densities through provision of the Zoning and Subdivision Ordinances, thereby preventing the need for overly extensive public services and restricting urbanization to that commensurate with the carrying capacity of the land.

<u>Policy 17:</u> The City shall promote the efficient use of land within the urban growth boundary and sequential development that expands in an orderly way outward from the existing city center.

Within the context of ORS 197.298 and Statewide Planning Goal 14, the City has attempted to maintain a compact urban growth form by including adjacent exception areas and resource lands that are contiguous to the existing urban growth boundary.

<u>Puliev 18:</u> The City shall provide a sufficient supply of developable land within the urban growth boundary to meet the needs of the existing and projected population for residential, commercial, industrial, and recreational uses over the next 20 – 50 years, while preserving the small town character of the community.

The 2010 Urbanization Study Update, as modified in 2014, includes a housing needs analysis and a buildable lands inventory that identifies the Cities land use needs for the next 20 years.

<u>Policy 19:</u> The City shall accommodate projected growth, expand the urban growth boundary in a manner that balances the need to protect high quality farm and forest resource lands with

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the needs of the existing and future population and with efficient public facility and service delivery.

This policy has been address through the 2010 Urbanization Study Update by addressing the priorities of ORS 197.298 and the factors of Statewide Planning Goal 14.

<u>Policy 40:</u> The City shall promote land use and development patterns that sustain and improve quality of life, are computible with mass transit, maintain the community's identity, protect significant natural and historic resources, and meet the needs of existing and future residents for housing, employment, and parks and open spaces.

The issues contained in this policy have been addressed in the 2010 Urbanization Study Update.

Transportation Goal Policies

Policy 1: Develop a street network system that evenly distributes traffic throughout the community, lessening traffic impacts on residential streets, and identifying a system of arterials for moving people, goods, and services safely and efficiently.

Policy 46: Provide a transportation system that is safe, convenient, accessible, environmentally responsible, efficient, responsive to community needs, and considerate of neighborhood impacts, particularly in the National Historic District.

Policy 47: Develop and maintain a street network that is inter-connected.

These policies has been implemented through the recent adoption of the City's Transportation System Plan, which utilized the land use needs of the city identified in the 2010 Urbanization Study Update.

Public Facility and Services Goal Policies

<u>Policy 15:</u> The city shall expand the urban growth boundary and city limits and provide sanitary sewer service, when available, to existing exception areas and other appropriate areas when such expansion is appropriate to meet city needs.

The preferred recommendations of the 2010 Urbanization Study Update has identified existing exception areas and other areas that should be added to the existing urban growth boundary. The availability of public services was considered during the analysis of the second locational factor of Statewide Planning Goal 14 in the 2010 Urbanization Study Update

Housing Goal Policies

<u>Policy 28</u>: The City shall encourage new housing to radiate out from the city center and discourage leapfrog development in order to promote connectivity and community interaction.

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The maintenance of a compact urban growth form has been one of the more significant factors in determining those properties recommended for inclusion into the urban growth boundary.

Natural Resources Goal Policies

<u>Policy 20:</u> The City shall protect, restore, manage, and enhance important natural resources; maintain high quality air, water, land and historic resources; and provide green spaces in and around the community.

<u>Policy 21:</u> The City shall protect or mitigate, whenever possible, fish and wildlife habitats including rivers, wetlands, und forests, and significant natural areas and habitats of rare or endangered species.

<u>Policy 17:</u> Areas containing any other unique ecological, scenic, aesthetic, scientific or educational values shall be considered in the planning process.

These policies have been implemented through the application third locational factor of Statewise Planning Goal 14 in the 2010 Urbanization Study Update.

Agricultural Lands Goal Policies

<u>Policy 2:</u> To the extent to which it has influence, the City shall promote the retention of lands outside its Urban Growth Boundary for agriculture use by encouraging Lane County to maintain current agricultural zoning within the City's urea of influence as defined in the Intergovernmental Agreement with Lane County.

<u>Palicy 5:</u> The City supports, and may require, measures to promote compatibility and transition between urbun development at the edge of the Urban Growth Boundary and adjacent agricultural areas.

<u>Policy 7:</u> The City supports, and shall pursue, establishment of a southern greenbelt that ensures a permanent open character for the area between Coburg and the McKenzie River.

<u>Policy 8:</u> The City shall protect high quality farmland surrounding the community from premature development.

These policies have been implemented through the application of ORS 197.298 and the fourth locational factor of Statewide Planning Goal 14 in the 2010 Urbanization Study Update.

The 2010 Urbanization Study Update includes a list of local expansion criteria or "local criteria" from the above listed guiding policies. They are as follows:

Local Criteria 1: Expansion should be limited to areas and tax lots which promote the greatest order and efficiency.

Local Criteria 2: Expansion should be limited to areas and tax lots that are appropriate to meet city needs.

Local Criteria 3: Expansion should be limited to areas and tax lots that would promote sequential development that expands in an orderly way outward from the existing city center, and promote a street network that is interconnected in order to promote connectivity and community interaction.

Local Criteria 4: Expansion should be limited to areas and tax lots that promote livability

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Local Criteria 5: Expansion should be limited to areas and tax lots that discourage premature development of agricultural lands and compatibility and transition between urban development and agricultural areas.

STATEWIDE PLANNING GOAL 14

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

- (1) Demonstrated need to accommodate long range urban population, consistent with a 28-year population forecast coordinated with affected local governments; and
 - The Coburg Urbanization Study (2010) used Lane County's Coordinated Population Forecast to estimate a twenty-year planning period.
 - The Lane County Coordinated Population Forecast provided a population forecast for Coburg in five -year increments.
 - The population forecast anticipated growth due to the construction of Coburg's first wastewater system. Due to the 2008 recession and a de facto growth moratorium because of a lack of a community wastewater system the City's actual population (based upon the 2010 Census and PSU's estimate for 2013) fell well helow the Lane County Coordinated Population Forecast for the period between 2010 and 2015. (Table A.3, Urbanization Study Revised)
 - The City's wastewater system will be completed by the early summer of 2014 and most of the existing businesses and residences were on-line prior to this time.
 - After adjusting for the lower than average growth rate that begins around the time the wastewater system is completed (now 2015 instead of 2010), the anticipated growth rate appears to be consistent with that of the coordinated population forecast except that it begins five years later. Thus, the expected growth rate of 7.88 percent that was supposed to occur between 2015 and 2020 will now occur between 2020 and 2025, and so forth.
- (2) Demonstrated need for housing, employment opportunities, livability or uses such as public facilities, streets and roads, schools, parks or open space, or any combination of the need categories in this subsection (2).

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

Residential Land Needs

• The 2010 Urbanization Study's buildable lands inventory is still valid as very little development has occurred in Coburg during the period of 2010 – 2014. For instance, only three additional residential units, consuming 0.5 acres of land, have

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- occurred during this period. The inventory has been adjusted, however, to address the reduced growth rate caused by the 2008 recession and the late development of the wastewater system.
- For the reason explained above, the basic assumptions of Coburg's housing needs analysis have not changed. The average household size and housing mix have not changed and the extension of the planning period has only slightly changed the number of new housing units needed. (See Table A.8, 2010 Urbanization Study Revised)
- The assumptions regarding public infrastructure needs have not changed and neither has the amount of total residential buildable lands.
- The use of the new 20-year planning period has only increased the amount of total new needed acres for residential use by 2.3 acres. The total amount of land needed for residential development, including supporting streets and parkland, is 148.8 acres.
- The 2010 Urbanization Study Update, as modified slightly in 2014, has identified the amount of land needed for medium and high density residential development. The preferred residential recommendation identifies Study Area 6 as the location for this type of housing.

Employment Opportunities

- The Economic Opportunities Analysis of the 2010 Urbanization Study states that Coburg's local employment land need is for one or two parcels of at least 20 acres and the Regional Economic Analysis states a regional need for 20 acre or larger sites. All of the exception lands within the 11 study areas are already divided into parcels significantly smaller than 20 acres in size. Therefore, they are all inappropriate, and would not acconunce amployment land need pursuant to ORS 197.298(3)(a), because the specific types of identified employment land needs cannot be reasonably accommodated on the exception land parcels.
- The soil classifications on Study Area 9 and Study Area 8 are similar, the next step in the required analysis under Goal 14 is to weigh the four locational factors within the Goal language, and determine which Study Area is more suitable for inclusion in the UGB. Table 7.6 summarizes the analysis of these four factors. Based upon the analysis, Study Area 8 scores 12 points, while Subarea 9 scores only seven points.

Goal 14 also requires that 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 four factors.

ORS 197.298

Priority of land to be included within urban growth boundary.

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- (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.

The Coburg Comprehensive Plan does not designate any lands as urban reserve.

(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.

Residential Land Needs

Map 11 of the 2010 Urbanization Study shows "built upon and developed" exception areas (designated as Rural Residential) and natural resource areas ((zoned either exclusive fann use or impacted forest) located adjacent to the Coburg Urban Growth Boundary. For purposes of analyzing the potential for expanding the Coburg Urban Growth Boundary, all of the exception areas are located within one of the 11 study areas. The majority of the exception lands are located adjacent and northwest of the Coburg Urban Growth Boundary, in the Stallings Lane area.

The 2010 Urbanization Study recommends that 169 acres of land be added to the Coburg Urban Growth Boundary to meet the city's 20-year need for residential land. The city has decided at this time to add only 148 acres to address its need for residential land; and option that is available to cities smaller than 25,000. Land to meet this need is proposed to be provided by portions of Study Areas 1, 2, 5 and 6.

Study Area 1: Study Area 1 includes lands south of the existing UGB, east of Coburg Road and West of Roberts Road. The eastern edge of the study area is bounded by the Southern Pacific Railroad right-of-way. The area is contiguous with the existing UGB on three sides. The area consists of approximately 95 acres in five parcels.

More than 90 acres of the site is zoned for agricultural uses (E-40), with 4.4. acres designated RR-2 (an exception area). Three dwelling units exist on the site as well as a few fann-related structures. The land is largely in active farm uses. Topographically, the site is largely flat. While no identified wetlands exist on the site, about 16 acres of the site are in flood zone A (the 100-year floodplain).

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The preferred residential alternative includes the 4.4 acres of exception lands. This alternative also includes 13.6 acres of resource land that is out of the flood plain. The resource land is separated from actively managed agricultural land to the south by a creek. In addition, it is occupied by several out buildings.

Study Area 2: This study area is 65 acres in size and contains 21 acres of exception lands. Nine of these exception acres, located immediately adjacent to the city limits are proposed to be added to the urban growth boundary. The remaining exception acres 12 acres are not proposed for addition to the boundary because they are inadequate to accommodate the residential land need. Eight of these acres are located within the 100-year floodplain, which is an environmental consequence pursuant to Factor 3 of Goal 14. In addition this land is bounded on three sides by agricultural land with Class II soils, and development with urban uses would pose compatibility issues with these agriculture activities pursuant to Factor 4 of Goal 14. For these reasons, inclusion of this exception land into the urban growth boundary is inappropriate and would not accommodate the residential need.

Twelve acres of exception area lands in this study area, located immediately adjacent to the Coburg Urban Growth Boundary on the north and Coburg Road on the cast, are included in the preferred residential alternative.

The recommended expansion of the urban growth boundary includes all of the exception areas located within Study Area 1 and most of the exception areas located within Study Area 2 plus an additional 183 acres of resource land located in Study Area I. This equates to a total of 27.3 developable land to be added to the urban growth boundary.

Study Area 3: Study Area 3 includes lands south and west of the existing UGB, west of Coburg Road. The area is contiguous with the existing UGB on the northeast side. The study area includes approximately 74 acres in 8 parcels. The majority of the study area (73.3 acres) is zoned for agricultural uses (E-30), with only one lot for rural residential uses. The rural residential lot is separated from the Coburg UGB by the agricultural lands within this study area. Agricultural lands in the study area are in orchards and other crops. Only two dwelling units exist in the study area, one of which is located in the exceptions area. Topographically, the site is largely flat. However, the site is several feet lower than the remainder of Coburg and is separated from the UGB by a vegetative buffer. The majority of the site (81%) is in flood zone A (the 100-year floodplain). Between the elevation difference and areas in the floodplain, this study area presents significant development constraints, All of the 73.3 acres zoned for agricultural uses in this study area are identified as Class II soil types. For these reasons, Study Area 3 was not included in the residential land expansion recommendation.

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Study Area 4: The 17 acres of exception land within this subarea are not proposed to be added to the urban growth boundary because they are located at the southern end of the study area; separated from the existing Cohurg Urban Growth Boundary by agricultural land with Class II soils, which would also have to be brought into the boundary as part of including this exception area. This exception area is surrounded hy agricultural land with Class II soils. Inclusion of this exception land into the urban growth boundary is inappropriate and would not accommodate the residential land need pursuant to Factor 3, the economic and social consequences of removing the intervening agricultural land from agricultural use, and Factor 4, the impact of potential urban uses on this exception land upon agricultural land surrounding the exception area.

Study Area 5. Study Area 5 includes lands north and west of the existing UGB. The area is contiguous with the existing UGB on part of the east side. The study area includes approximately 200 acres in 56 parcels. The majority of the study area (172.3 acres) is in exception areas (RR-5 zoning). Only one tax lot of about 28 acres is in agricultural zoning (E-40). A total of 43 dwelling units exist in the study area; 39 of which are located in exceptions areas. Topographically, the site is largely flat. Of the 28.1 acres in this study area zoned for agricultural uses, 18.1 acres are in Class I soil types and 9.4 acres are identified as Class Π soil types. The residential preferred alternative includes 75 acres of these lands, and excludes 97 acres; 20 acres at the southern and of the exception area on the south side of Van Duyn Road, and 77 acres at the northern end of the exception area.

The southern 20-acre area, located south of Van Duyn Road, is bounded on three sides by agricultural lands with Class II soils – exclusion of this area would place the urban growth boundary along Van Duyn Road, which would provide an appropriate transition between urban and agricultural uses. Inclusion of this exception land into the urban growth boundary is inappropriate and would not accommodate the residential land need pursuant to Factor 4, the impact of potential urban uses on this exception land upon agricultural land surrounding the exception area.

The northern 77-acre area is farthest from the existing wban growth boundary among exception lands in Study Area 5. As such, it would be more expensive to serve with public facilities such as water, sewer, and transportation facilities, perhaps hastening the need for construction of a new northern connector roadway (see Map 17). It is also adjacent to agricultural lands with Class I and II soils to the north, east, and west. Existing residents of this area were split in terms of wishing incorporation into the Coburg Urban Growth Boundary. Therefore, inclusion of this exception land into the urban growth boundary is inappropriate and would not accommodate the residential land need pursuant to Factor 3, the economic (facilities costs) and social (resident opposition) impacts, and Factor 4, the impact of potential urban uses on this exception land upon agricultural land surrounding the exception area.

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The preferred residential alternative includes 75 acres of exception acres located north of Van Dyne Road; which provide 64 acres of developable residential land.

Study Area 6: Study Area 6 includes lands directly north of the existing UGB. The area is contiguous with the existing UGB on the north side and part of the east and west sides. The study area includes approximately 209 acres in 4 parcels (one parcel contains over 100 acres) and the majority of the area is in a common ownership. Most of the study area (208 acres) is zoned for agricultural uses (E-40). Less than 1 acre is zoned for rural residential uses (RR-5) and this parcel is separated from the Coburg UGB by the agriculturally zoned land. A total of 6 dwelling units exist in the study area. Topographically, the site is largely flat.

Forty-nine acres (48.9) of this study area, all of it developable resource land, are included in the preferred residential alternative. Expansion in this area is preferred because it is immediately adjacent to the Urban Growth Boundary and its northern boundary is slated by the Transportation System Plan to be the location of a new east—west connector. This project is necessary to provide redundant east—west connectivity as Pearl Street is the only through east—west route in the city. The proposed collector is also necessary to mitigate the significant deterioration of traffic conditions on Willamette and Pearl Streets and to serve the proposed build-out of the Stallings Lane area. (Pg. 22 of the TSP).

This property also represents the greatest potential for higher density residential development as it not adjacent to property located within the Coburg Historic District or any developed neighborhoods.

Study Area 7: Study Area 7 includes lands east of the existing UGB and across I-5 and contains no built upon or committed exception lands. The area is not contiguous with the existing UGB. Inclusion of this area would require additional expansion of the UGB across I-5. The study area includes approximately 240 acres in 3 very large parcels. The entire study area (239.9 acres) is zoned for agricultural uses (E-40). Agricultural lands in the study area are used primarily for grazing. No development exists in this study area. Topographically, the site is largely flat. The study area has (23 acres) is in flood zone A (the 100-year floodplain) or in identified wetland area. The major development constraint in this study area is extending municipal services across I-5.

Study Area 8: Study Area 8 includes lands east of the existing UGB and across I—5 and contains no built upon or committed exception areas. Unlike Study Area 7, Study Area 8 shares a significant border with the existing UGB. A portion of the original Study Area 8, identified in the 2004 Urbanization Study, was brought into the UGB in 2006. Study Area 8 now consists of the remaining acreage that was not included in that expansion.

Study Area 9; Study Area 9 includes lands east of the existing UGB and across Interstate 5 and contains no built upon or committed exception areas. The northwest corner of the area is contiguous with the existing UGB.

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Inclusion of this area would require additional expansion of the UGB across I-5. The study area includes one parcel of approximately 26 acres. This parcel is designated by Lane County as resource (Forest) land. Half of the site is significantly wooded and the eastern most portion is nestled against the foothills of the Coburg Hills. As a result Study Area 9 contains the most significant slopes of any of the 11 study areas, although it is noted, the slopes are relatively insignificant.

Study Area 10: Study Area 10 includes lands south of the existing UGB, both east and west of Coburg Road and south of Study Areas 1 and 2. The castern edge of the study area is bounded by Interstate 5 and includes a parcel between 1–5 and the Southern Pacific Railroad right-of-way. The eastern portion of the study area is contiguous with the southern most arm of the existing UGB. The study area is long and narrow running east and west and consisting of four parcels and two residences. The area straddles the southern gateway to the City of Coburg from Eugene along Coburg Road.

The entire area is zoned for agricultural use, much of it largely in active farm uses, and contains no built upon or committed exception areas. Topographically, the site is largely flat.

Study Area 11. The exception land within this subarea is not proposed to be added to the urban growth boundary. The 18 acres of rural residential land is located at the northern end of the study area, and is separated from the existing Coburg Urban Growth Boundary by agricultural land with Class I and Class II soils, which would also have to be brought into the boundary as part of including this exception area. This exception area is surronneed by agricultural land with Class I, II, and III soils. Inclusion of this exception land into the urban growth boundary is inappropriate and would not accommodate the residential land need pursuant to Factor 3, the economic and social consequences of removing the intervening agricultural land from agricultural use, and Factor 4, the impact of potential urban uses on this exception land upon agricultural land surrounding the exception area.

Economic Opportunity Needs

The Economic Opportunities Analysis of the Urbanization Study has found that Coburg's local employment land need is for one or two parcels of at least 20 acres in size and the Regional Employment Analysis found a need for 51.4 net acres in 20+ acre parcel sizes to capture ten percent (10%) of the regional large site industrial need. Therefore, none of the exception lands within the study areas are suitable for industrial development as they are already divided into parcels significantly smaller than 20 acres.

Study Areas 1, 6, 7, 8, 9 and 10 are located immediately adjacent to existing lands designated and zoned for highway commercial and industrial use. Of these study areas only Study Area 1 contains an exception area and this small area is projected to be brought into the urban growth boundary to help satisfy the need

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- for residential land. Study Area 8 is the only other study area within this group that is contiguous to an exception area.
- (c) If land under paragraphs (a) and (b) of this subsection is inadequate to uccommodate the amount of land needed, third priority is land designated as marginal land pursuant to ORS 197.247 (1991 Edition).
 - There is no land adjacent to the Coburg Urban Growth Boundary that has been designated as marginal land.
- (d) If land under paragraphs (a) to (c) of this subsection is inadequate to accommodate the amount of land needed, fourth priority is land designated in an acknowledged comprehensive plan for agriculture or forestry, or both.
- (2) Higher priority shall be given to land of lower capability as measured by the capability classification system or by cubic foot site class, whichever is appropriate for the current use.
- (3) Land of lower priority under subsection (1) of this section may be included in an urban growth boundary if land of higher priority is found to be inadequate to accommodate the amount of land estimated in subsection (1) of this section for one or more of the following reasons:
 - (a) Specific types of identified land needs cannot be reasonably accommodated on higher priority lands;
 - (b) Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or
 - (c) Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.

Residential Land Needs

For Coburg to adopt the preferred resident all land alternative, it must make appropriate findings pursuant to ORS 197.298 that justify this alternative in contrast to Expansion Alternative #1. Expansion Alternative #1 proposed UGB additions for residential development (178 acres, 151 developable) that consisted entirely of exceptions lands, while the city's preferred residential land alternative adds 169 acres (143 developable), 88 acres of exceptions land and 81 acres of resource land.

Existing residential development in Coburg is located on the west side of I-5 and the City wishes to continue this urban form. With the exception of the property located west of 1-5, the Coburg Urban Growth Boundary is totally surrounded by Class 1-III agricultural soils. ORS 197.298(2) provides that a higher priority shall be given to land of lower capability as measured by the capability classification system or by cubic foot site class, whichever is appropriate for the current use.

With a few exceptions, most of the Class I agricultural soils adjacent to the

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Coburg Urban Growth Boundary on the west side of 1–5 are built upon or committed to urban development. The remainder of the immediately adjacent soils are Class II. Thus, because the immediately adjacent exception areas cannot totally meet the forecasted need for residential land, some land with Class II soils must be included in the expansion of the urban growth boundary. The resource land that is added has been taken from Study Area's 1 and 6 as these areas are contiguous to the existing urban growth boundary and, as proposed, will preserve a compact urban form for purposes of the efficient provision of urban services and transportation access.

The residential preferred alternative does not include higher priority exception lands in Study Areas 2, 4, 5, and 11. Note that it also does not include exception lands in subareas 3 and 6 – however the amount of exception lands in these subareas are separated from the existing Coburg urban growth boundary by agricultural land. It also does not include higher priority agricultural and forest lands with lower soils classifications (Class III, Class IV, and Class VI) that are within Study Areas 7, 8, and 9. The city makes the following findings justifying lowering the priority for inclusion of these lands in the urban growth boundary, and adding lower priority lands in their place:

EXCEPTION LANDS

Study Area 2: 12 acres of exception land, located south of nine acres of exception land that is proposed for addition to the urban growth boundary, is not proposed for addition to the boundary because it is inadequate to accommodate the residential land need. Eight of the 12 acres is located within the 100-year floodplain, which is an environmental consequence pursuant to Factor 3 of Goal 14. In addition this land is bounded on three sides by agricultural land with Class II soils, and development with urban uses would pose compatibility issues with these agriculture activities pursuant to Factor 4 of Goal 14. For these reasons, inclusion of this exception land into the urban growth boundary is inappropriate and would not accommodate the residential need.

Study Area 4: Seventeen acres of exception land within this subarea is not proposed to be added to the urban growth boundary. The 17 acres is located at the southern end of the study area, and is separated from the existing Coburg Urban Growth Boundary by agricultural land with Class II soils, which would also have to be brought into the boundary as part of including this exception area. This exception area is surrounded by agricultural land with Class II soils. Inclusion of this exception land into the urban growth boundary is inappropriate and would not accommodate the residential land need pursuant to Factor 3, the economic and social consequences of removing the intervening agricultural land from agricultural use, and Factor 4, the impact of potential urban uses on this exception land upon agricultural land surrounding the exception area.

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Study Area 5: This study area contains 172 acres of exception lands. The residential preferred alternative includes 75 acres of these lands, and excludes 97 acres; 20 acres at the southern end of the exception area on the south side of Van Duyn Road, and 77 acres at the northern end of the exception area.

The southern 20-acre area is bounded on three sides by agricultural lands with Class II soils – exclusion of this area would place the urban growth boundary along Van Duyn Road, which would provide an appropriate transition between urban and agricultural uses. Inclusion of this exception land into the urban growth boundary is inappropriate and would not accommodate the residential land need puisuant to Factor 4, the impact of potential urban uses on this exception land upon agricultural land surrounding the exception area.

The northern 77 acre area is farthest from the existing urban growth boundary among exception lands in Study Area 5. As such, it would be more expensive to serve with public facilities such as water, sewer, and transportation facilities, perhaps hastening the need for construction of a new northern connector roadway (see Map 17). It is also adjacent to agricultural lands with Class I and II soils to the north, east, and west. Existing residents of this area were split in terms of wishing incorporation into the Coburg Urban Growth Boundary. Therefore, inclusion of this exception land into the urban growth boundary is inappropriate and would not accommodate the residential land need pursuant to Factor 3, the economic (facilities costs) and social (resident opposition) impacts, and Factor 4, the impact of potential urban uses on this exception land upon agricultural land surrounding the exception area.

Study Area I1: The exception land within this subarea is not proposed to be added to the urban growth boundary. The 18 acres of tural residential land is located at the northern end of the study area, and is separated from the existing Coburg Urban Growth Boundary by agricultural land with Class I and Class II soils, which would also have to be brought into the boundary as part of including this exception area. This exception area is surrounded by agricultural land with Class I, II, and III soils. Inclusion of this exception land into the urban growth boundary is inappropriate and would not accommodate the residential land need pursuant to Factor 3, the economic and social consequences of removing the intervening agricultural land from agricultural use, and Factor 4, the impact of potential urban uses on this exception land upon agricultural land surrounding the exception area.

Economic Opportunity Needs

For Coburg to adopt the preferred employment land alternative, it must also make appropriate findings pursuant to ORS 197.298 that justify the alternative in contrast to inclusion of higher priority exception lands to meet the employment land need. The preferred employment land alternative would add 106 acres of agricultural land, and no exception lands.

As stated above, Study Areas 1, 6, 7, 8, 9 and 10 are located immediately adjacent

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to existing lands designated and zoned for highway commercial and industrial use and these are the most logical locations for expansion of these uses in order to be consistent with the current urban form. However, Study Areas 1, 6 and 10, located on the west side of I-5, are largely occupied by Class I and III agricultural soils. ORS 197.298(2) states, "Higher priority shall be given to land of lower capability as measured by the capability classification system or by cubic foot site class, whichever is appropriate for the current use." For this reason, they are not considered as prime candidates to expand the urban growth boundary to address forecasted economic opportunity needs.

The soils on the east side of I-5 are lower class agricultural soils than those on the west side. Study Area 7 is composed largely of Class IV and Study Area 8 and 9 are composed of Class IV and VI soils.

EMPLOYMENT LAND ALTERNATIVES

For Coburg to adopt the preferred employment land alternative, it must make appropriate findings pursuant to ORS 197.298 that justify this alternative instead of incorporating alternative exception lands into the urban growth boundary to satisfy the need for employment land. Among resource lands, Study Area 8 has worse soils (Class IV and Class VI) than all other agricultural and forest lands except for Study Area 9, which has a predominance of class IV soils and approximately equal areas of Class III and VI soils.

Regarding employment lands, Coburg finds that all exception lands within the Study Areas are unsuitable for industrial development for the following reasons:

- The Economic Opportunities Analysis states that Coburg's employment land need is for one or two parcels of at least 20 acres and the Regional Economic Analysis indicate that regional-scale industrial opportunities exist for parcels of 20 acres or greater in size. All of the exception lands within the 11 study areas are already divided into parcels significantly smaller than 20 acres in size. Therefore, they are all inappropriate, and would not accommodate employment land need pursuant to ORS 197.298(3)(a), because the specific types of identified employment land needs cannot be reasonably accommodated on the exception land parcels.
- Regarding Study Area 9, since the soil classifications on this Study Area and Study Area 8 are largely similar, the next step in the required analysis under Goal 14 is to weigh the four locational factors within the Goal language, and determine which Study Area is more suitable for inclusion in the UGB. Table 7.6 from the 2010 Urbanization Study Update summarizes the analysis of the four factors discussed earlier in this chapter. Based upon the analysis, Study Area 8 scores 12 points, while Subarea 9 scores only seven points. Further discussion of the Goal 14 locational factors is included below.

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HIGHER PRIORITY RESOURCE LANDS

Study Areas 7, 8 and 9: These three study areas contain a total of 373 acres. Most of these three subareas have Class IV soil types, with smaller areas of Class VI and Class III. They are located to the east of the Interstate 5 freeway. Study Area 8 is proposed to be added to the urban growth boundary for employment land purposes (see discussion below), so it is not available to satisfy residential land need. Study Areas 7 and 9 would be most difficult and expensive to serve with public facilities, due to the need for interchange improvements to provide transportation and extension of water, sewer, storm drainage, and electricity lines under hiterstate 5. In addition, extension of the urban growth boundary to the east side of Interstate 5 has been a source of significant opposition from rural property owners to the cast. Additionally, Study Areas 7 and 9 both contain mapped wetlands, and Study Area 7 also contains land within the 100 year floodplain. Inclusion of this higher priority agricultural and forest land into the urban growth boundary is inappropriate and would not accommodate the residential land need pursuant to Factor 3, the economic consequences of providing expensive and difficult public facilities to these parcels, the environmental consequences of development within the 100 year floodplain and impacts to mapped wetlands, and the social consequences of residential and community opposition to expanding the urban growth boundary east of the Interstate 5 freeway.

FOUR LOCATIONAL FACTORS OF GOAL 14

•nce higher priority exception lands and agricultural lands with lower soil classifications are excluded, the next step in the required analysis under Goal 14 is to weigh the four locational factors within the Goal 14 text, and then determine which Study Area is more suitable for inclusion in the UGB.

The analysis above has resulted in a deficit of 76 developable residential acres that must come from the remaining Study Areas and agricultural land with Class I or II soils. Table 7.6 summarizes the analysis of the four factors discussed earlier in this chapter. Study Area 6, with 17 points, and Study Area 2, with 13 points, score higher than any of the other Study Areas other than Study Area 5, which consists of exception lands except for one parcel in the northern portion of the study area owned by the Eugene School District, and suffering from issues similar to those that resulted in the exclusion of the northern portion of Subarea 5 from the Coburg urban growth boundary.

The analysis above has resulted in a deficit of 91.7 net developable industrial acres that must come from the Study Areas. Table 7.6 summarizes the analysis of the four factors discussed earlier in this chapter. Study Area 8 scored 12 points and Study Area 9 scored 7 points.

Further discussion of the Goal 14 locational factors is included below.

The following are the four Goal 14 factors that must be considered to modify an existing

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urban growth boundary:

(1) Efficient accommodation of identified land needs;

This factor is generally interpreted to equate "elliciency" with being "contiguous or adjacent" to existing development." Following the priorities analysis required by statute and Goal 14, and mirroring the process followed in the 2004 Urbanization Study, the Coburg urbanization study team developed 11 study areas. The actual expansion alternatives may include portions of one or more study area as deemed appropriate.

Coburg's Urban Growth Boundary has a perimeter of approximately 7.5 miles. The study areas constitute almost all lands adjacent to the current UGB (see Map 10). The study areas are generally numbered in a clockwise direction, beginning with Study Area 1, located along the southern portion of the current Coburg Urban Growth Boundary and continuing around its perimeter. The study areas utilized for this expansion analysis are identical, for the most part, to the study areas utilized in the 2004 Urbanization Study. The only difference is the addition of Study Areas 9, 10 and 11, and the reconfiguration of Study Area 8 to account for lands which have been added to Coburg's UGB since 2004.

The following considerations were considered in developing logical study area boundaries:

- Property lines/ownership patterns, based upon Lanc County Assessor Map records of the tax lot boundaries.
- Natural Features, such as wetlands, streams, and 100-year floodplains
- Streets and roads
- Tax lots reported by the County Assessor records as "Unimproved."
- Fundamental understanding of water and sanitary sewer service infrastructure.

Not all of the area adjacent to the existing UGB is included in the study areas. An initial review of the land surrounding the UGB identified areas adjacent to the UGB that could be excluded from consideration for expansion. State OAR (660-024-0060(5) provides local governments the authority to guide the selection of expansion alternatives through City policies specifying certain land characteristics as necessary for land to be suitable for expansion.

The identification of study areas included considerations of both ORS Priorities as well as locally specified characteristics or "local criteria" (as they are referred to throughout the 2010 Urbanization Study). Lands to the northeast of Coburg are the only lands excluded entirely from consideration within a study area. These areas were not included based on a local priority for expansion that "provides the best opportunity for developing an efficient urban form." The isolated nature of the lands adjacent to the northeast corner of Coburg was viewed as sufficient justification for disregarding their inclusion within a study area.

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Residential Land Needs

Study Areas 1 and 6 have the greatest ability to meet the intent of this factor due to their proximity to the existing urban growth boundary and existing development therein. Lands within Study Areas 2 and 5 are included because they are the exception areas with the greatest contiguity to the existing urban growth boundary.

Economic Opportunity Needs

Coburg's existing highway commercial and industrial land is located adjacent to I-5 and this location remains the most efficient and logical area to meet future economic opportunity needs. Study Areas 1, 6, 7, 8, 9 and 10 are located immediately adjacent to existing lands designated and zoned for highway commercial and industrial use. Study Areas 1, 6, and 7 are excluded from consideration because of their high value agricultural soils and, except for Study Area 7, are being considered necessary to meet residential land needs. Study Area 8 represents the most "efficient" accommodation of identified land needs because of its sharing of a major property boundary with the existing urban growth boundary.

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

Residential Land Needs

While a detailed cost study has not been conducted, a generalized estimate of general service extension costs was provided by the Coburg Public Works Department. This estimate indicated that in terms of property immediately adjacent to the current compact urban form, sewer and water service can most inexpensively be extended to Study Areas 5 and 6, followed by Study Areas 1 and 2. Study Area's 10 and 11 also have the lowest cost for service extension but they area located farthest away from the urban core of the city and generally contain the best agricultural soils.

Economic Opportunity Needs

The major development constraint regarding properties located east of I-5 (Study Areas 7-9) is extending municipal services across I-5. Water, sewer, electricity, and storm drainage would all probably require boring under the Interstate. A pump station might be required to move sewage from the area to the treatment plant on the north end of Coburg. Transportation access to the site would come from Van Duyn Road—a County Road. Development in these areas may be constrained until the I-5 interchange improvements are completed. It is noted that Study Area 8 is adjacent to lands already within the UGB (east of I-5), and for which the City has an obligation to provide service to, and is adjacent to Van Duyn Road and a proposed wastewater sewer connection.

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

Residential Land Needs: Study Area 1

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Economic consequences. Study Area 1 has limited opportunities in the area for commercial or even industrial uses, however, public sentiment favors residential use for the area. Impacts to existing economic conditions would include the removal of farmland acreage that is currently producing a commercial crop.

Social consequences. This area abuts industrial uses off of Roberts Court, and conflicting uses could create limited impacts or limitations (obvious or subtle) to their operation adjacent to sections of Courg's city limits that are developed with a residential neighborhood (to the north) and industrial uses (to the cast). The area also includes existing residences, which occur on both County designated exceptions land (two homes) and non-exceptions land (one home). To the west and across from Coburg Road is a significant area of exceptions land as well. This dynamic has potential for hoth positive and negative social consequences. The lifestyle of current residents in this area will be altered; however the livability of the area will be relatively high for new residents moving in. Expansion in this area will also have significant potential to redefine the southern gateway to the City along Coburg Road. There has been some interest expressed from property owners in this area about future annexation into the City as part of long-term plans for the property.

Environmental consequences. The environmental consequences of adding this study area to the urban growth boundary are primarily determined by the existence of the floodplain as the area contains significant acreage within 100-year floodplain. Although floodplain does not prohibit development, it does present an environmental contlict that does not exist in all study areas. Development within these floodplain areas would introduce an increased risk of hazard to housing stock within Coburg. In addition, Muddy Creek flows through the western portions of Study Arca 1.

Energy consequences. The energy consequences of expanding the urban growth boundary into Study Area 1 are generally positive. Water and sewer lines already extend up to several areas adjacent to Study Area 1 and would provide a relatively efficient conversion to urban use. Access to Study Area 1 would be very good as the area could be served by Coburg Road, other local streets and perhaps Roberts Road to the east.

Residential Land Needs: Study Area 2

Economic consequences. Like Study Area 1, Study Area 2 would be neither the least expensive area to service nor the most. The area contains aercage that would be removed from active farming if developed.

Social consequences. Study Area 2 contains a significant amount of exceptions land (35%). There are about eight residences in Study Area 2, most of which are within the exceptions land. Although there may be resistance to expansion in this area amongst current property owners, livability in the area, excepting floodplain dynamics, would be very high given its proximity to downtown and Coburg Road. Also because many Coburg residents work in the Eugene-Springfield Area, expansion on this end of town will ease

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traffic through Downtown Coburg on Willamette Street. There has been some interest expressed from property owners in this area about future annexation into the City.

Environmental consequences. This study area_contains significant acreage within the 100-year floodplain (21%). Most of the floodplain areas are located on the exceptions land. The remaining resource acreage is Class Π soils, most of which is being actively farmed. There is also a small wetland identified in the National Wetlands Inventory located in the northwest corner of Study area.

Energy consequences. The area would be relatively easy to service due to its flat topography. Water service would be relatively easy to extend to the site, as would electrical. Coburg Road provides access into the area. The overall energy consequences are generally positive.

Residential Land Needs: Study Arca 5

Economic consequences. Study Area 5 is one of the least expensive areas to extend City water and stormwater service into. This is due to the fact that much of the area is currently served by water along North Coburg Road North. An important consideration in expansion into Study Area 5 is the sewer service obligation to existing residents that will be immediately effective if all or any portion of area 5 is included. This obligation is more significant in Study Area 5 than other areas, and is an important cost related issue for the City to consider. The more northern portions of Study Area 5 would be progressively more expensive to provide services to because of the increased distance from existing city facilities to the south, and would accelerate the need to construct an expensive northern connector road.

Study Area 5 is not identified as an area for employment expansion and expansion would provide no benefit in that regard. The area contains a number of small farms and mid-sized farms. Economic impacts will be more substantial for the relatively few operating-mid sized farms. The only resource land in Study Area 5 is the 28 acre piece owned by Eugene 4J School District. The overall economic consequences of expansion into Study Area 5 are not seen as leaning significantly either way.

Social consequences. Study Area 5 contains many existing residents (43 dwelling units). Expansion impacts will affect many more people in Study Area 5 than in most other areas. It can, however, be argued that the individual impacts will be relatively less to residents in Study Area 5 than in some other areas since the area is currently residentially zoned, of a certain residential character, and already has a relatively significant population. The area contains many rural residences, which, if included in the UGB will receive significant development pressure. Previous efforts have suggested the residents in Study Area 5 are split in their support of expansion in their direction. The area is in very close proximity to Coburg Elementary School, a potential future school site, and the southern portions of this study area are relatively near Coburg's downtown, all of which promote high livability.

Environmental consequences. The environmental consequences of expansion into Study

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Area 5 are seen as minimal for about half of the exceptions lands. Although the area consists of Class I and II soils, the area contains significant existing development. The limited resource land within Study Area 5 is predominantly Class I soils. By directing growth to this area, areas of greater environmental significance and with greater potential can be avoided. However, the portion of this study area south of Van Duyn Road is bounded on three sides by agricultural land with Class II soils. Urban development of this area would have significant consequences to adjacent agricultural lands. The northern half of this study area is a "peninsula" of rural residential development surrounded on three sides by agricultural land, and urban development on these lands would have significant consequences to adjacent agricultural lands. For this reason, the northern and southern portion of this Study Area are not proposed to be included within the expanded urban growth boundary.

Energy consequences. Study Area 5 appears relatively easy to service due to its proximity to the proposed sewage treatment plant. As noted, much of Study Area 5 is already served with both water and stormwater. Expansions on the north end of town will place greater traffic pressure on arterials that carry traffic through Coburg to reach Eugene-Springfield (Willamette Street and Pearl), and might require the construction of an expensive new northern connector road. With existing facilities in place, and high livability potential, the overall energy consequences are generally positive.

Residential Land Needs: Study Area 6

Economic consequences. Study Area 6 is the least expensive area to provide water and stormwater service to. The area is adjacent to the proposed sewer treatment plant and therefore provides greater efficiency in that regard as well. Study Area 6 is currently made up of two residential lots and two large active fanns.

Study Area 6 is not identified as an area for employment expansion; however industrial opportunities seem possible in the northeastern portions of the area, due to its proximity to existing Industrial uses, and its proximity to the water treatment plant.

Because inclusion of the northern portion of this subarea into the UGB would likely require construction of the expensive northern connector road, this portion of the study area is not proposed to be included within the expanded nrban growth boundary.

Social consequences. Study Area 6 has potential for creating a high livability standard for expansion. The area presents many options for connectivity to existing neighborhoods and street networks. Expansion into the area supports local policy encouraging "sequential development that expands in an orderly way outward from the existing city center." Study Area 6 provides opportunities for excellent access to facilities such as schools and downtown. Expansion in this area involves a limited number of property owners, which minimizes the complexity of realizing expansion/planning objectives. It is also noted that the owners of the property adjacent to the current UGB have expressed interest in urbanization.

Environmental consequences. Only 7 of the 209 acres in Study Area 6 are in flood zone

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A (the 100-year floodplain). Areas in flood zone A are mostly in a canal that transects the study area. Of the 208 acres in this study area zoned for agricultural uses, 63.6 acres are in Class I soil types and 138.5 acres are identified as Class II soil types, and 5.9 acres are in Class IV soil types. The area is prime farmland. Although Area 6 consists of Class I and II soils, the area contains significant development. By directing growth to Area 6, areas of greater environmental significance can be avoided.

Energy consequences. Study Area 6 appears relatively casy to service due to its proximity to the proposed sewage treatment plant. Although Area 6 is not already served with both water and stormwater, an abundance of connection points make it a very serviceable option. As noted earlier, expansions on the north end of town will place greater traffic pressure on arterials that carry traffic through Coburg to reach Eugene-Springfield (Willamette Street and Pearl).

Economic Opportunity Needs: Study Area 8

<u>Economic consequences</u>. Like Study Area 7, Study Area 8 is among the most difficult to service due to its location east of 1-5. It is also among the most expensive alternatives because water, sewer, electricity, and storm drainage would all probably require boring under the interstate. In addition, improvements to the interchange may be necessary to address development not included in the IAMP review.

It should be noted that Study Area 8 is directly adjacent to the only portions of Coburg's existing UGB east of 1–5. The entire site consists of one parcel with one use (a cattle ranch). The acreage belongs to the same ranch operation occupying Study Area 7. Study Area 8 is viewed by the City as having prime employment potential. The economic consequences of the reduction of the ranching activities would likely be outweighed by potential economic gains of utilizing the land for industrial purposes. Additionally, the economic opportunities for areas east of 1–5 have the potential to outweigh the negative economic consequence of expansion into the area (cost of extending service, etc.).

Social consequences. Because Study Arca 8 is separated from the other ranch properties to the north by Van Duyn, and is surrounded by other uses, the owners may be more amenable to its inclusion than Study Area 7. However, as noted, there has been public resistance in the past to expansion of Coburg's UGB east of 1-5. Study Area 8 is directly adjacent to a number of properties under various ownership and uses, including a few residents in the rural areas east of the interstate. Again, correspondence with property owners has suggested a willingness on their part to entertain ideas about expansion on their property. Expansion east into Study Area 8 will allow for both the growth of the community, and the preservation of appropriate separation and buffers between the City's industrial and residential uses.

Environmental consequences. Of all of the acreage in Study Area 8, 98% is Class V or VI soils. These soils are of the lowest values that are typically mapped. The study area has the lowest value soils overall of any other study area. Area 8 also contains no mapped wetlands, or floodplain areas while Study Areas 7 and 9 both have mapped wetlands.

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Energy consequences. Transportation access to the site would come from Van Duyn Road—a County owned extension of Pearl Street. Economic activity is undertaken more efficiently in areas nearest to transportation corridors such as I-5. In this manner expansion into this study area has positive energy consequences. This study area was favored over lands north of Van Duyn (Study Area 7) largely due to the fact that a frontage road is already planned to be constructed to serve sites south and cast of the interchange and because it is already separated from other like uses (Area 7) to the north by Van Duyn. Areas north of Van Duyn do have the benefit of greater separation from existing residential uses east of the interstate, and freeway frontage (exposure), but in the end Study Area 8 seemed better suited to the need overall. It is also noted that the 2004 Urbanization Study recommended that the City consider Study Areas 7 and 8 for employment growth and to take steps to preserve these areas for future employment growth.

Economic Oppurtunity Needs: Study Area 9

Economic Consequences. Study Area 9 joins Areas 7 and 8 in being the most expensive areas to extend services due to its location east of I-5. Most significant to Study Area 9's profile is that the area abuts a rare crossing and connection to areas of Cohurg east of I-5. It is also noted, however, that the condition of the bridge is not immediately known. Expensive repairs may be necessary if the bridge is not in proper condition, or does not meet required specifications.

Although Study Area 9 does not share the access advantages of Study Areas 7 and 8, it is in very close proximity to 1-5 and is connected to sections of existing industrial land within Coburg via Reed Road/Selby Way. Reduction of or discontinuance of activities currently on the site is not viewed as having negative economic consequences when balanced with the potential positive economic consequences of employment growth on the site.

Social Consequences. There is one owner of Study Area 9 and one existing residence. As noted with previous areas, this can reduce the complexity of the expansion process and the potential for reaching planning objectives. It also may result in significant impacts (positive and/or negative) to the individual property owner.

The area would be most appropriately used for employment purposes. It is noted that one advantage for consideration of Study Area 9, is the existing access to the site over I-5 via Selby Way. Access via Selby Way would necessitate a relatively lengthy and circuitous route for commercial and industrial traffic, contributing to noise, pollution and traffic in the area. As compared to Study Areas 7 and 8, Study Area 9 appears to present greater negative social consequences.

Environmental consequences. Study Area 9 includes the only forest designated land within all study areas. It is not prime forest land. Study Area 9's soil profile is largely Class IV and VI, with smaller portions of Class III. The site includes several small water

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features; however none are located on either the National or Local Wetlands Inventory. Study Area 9 presents the only expansion alternative that encroaches onto the Urban-Wildland interface (foothills of the Coburg Hills). It is not immediately understood what impacts such expansion might have.

Energy consequences. Study Area 9 will require the extension of all scrvices. If residential uses are directed to the area, it is noted that the area does not have a school site or an existing school within several miles of its boundaries. Transportation access to the site would come from Selby Way—a County Road. The condition of the existing bridge across 1-5 is not completely understood. Development on the site may be constrained if the bridge is not in proper condition, or does not meet required specifications.

Expansion into Study Area 9 does not as clearly meet the efficiency related policy of expansion that is "sequential development that expands in an orderly way outward from the existing city center.

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

Residential Land Needs

Areas with more land contiguous to existing development, such as study areas 1 and 6 are probably most compatible with nearby agricultural activities. However, any land that is adjacent to agricultural activities will have an impact with respect to this factor. The 2004 Urbanization Study's evaluation of this factor suggested that the compatibility impacts do not appear to be much different between the UGB study areas.

Economic Opportunity Needs

Because of the higher class agricultural soils located on the west side of I-5, and the attendant active agricultural uses, expansion to meet economic opportunity needs has been focused on the west side of the freeway. The worst agricultural soils are located in Study Area 8 and the agricult ral uses on this and adjacent properties is not intensive; essentially consisting of the grazing of cattle. The types of industries identified as targets for economic growth by the 2010 Urbanization Study Update and the Regional Economic Analysis are inherently compatible with existing and agricultural and forest activities in the area.

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