

W.L.B.

CITY OF JUNCTION CITY

680 GREENWOOD • P. O. BOX 250
JUNCTION CITY, OREGON 97448-0250
TELEPHONE 998-2153 • FAX 998-3140

May 16, 2008

Commissioner Faye Stewart – Board Chair
Board of County Commissioners
125 E. Eighth Avenue
Eugene, OR 97401

Re: Lane County Code 16.400(8) – Rural Comprehensive Plan Amendment

Dear Commissioners:

This letter is an attempt to explain Junction City's situation and need for a coordinated population forecast to be adopted into the Lane County Rural Comprehensive Plan. Specifically, the City will see the development of the newest State Prison, one of two State Mental Hospitals designed to replace the aging Salem facility, and the relocation of Grain Millers from Eugene to allow expansion and retention of agriculturally-related jobs within Lane County and Oregon:

- The City has received a \$168,000 grant from the Department of Land Conservation and Development (DLCD) to enter into Customized Periodic Review (CPR), which will begin this month. The purpose of this CPR is to update the City's Comprehensive Plan land use policies and implementing ordinances to address emerging issues resulting from the siting of the state mental health and prison facilities, as well as address the short term employment needs for Lane County with the relocation of Grain Millers to Junction City. The prison and hospital are estimated to employ 1,800 people (more if the Mannix measure passes) and Grain Millers currently provides 100 family wage jobs.
- The Governor's Economic Revitalization Team identified the CPR process as the best means to plan for the new state facilities and needed Urban Growth Boundary (UGB) expansion to accommodate Grain Millers. Issues to be addressed in the CPR process include: 1) an Economic Opportunity Analysis (EOA), 2) a Buildable Lands Inventory (BLI) and Residential Land Needs Analysis (RLNA), 3) a UGB evaluation for potential expansion, and Urban Reserves Study (50-year overview), and 4) Comprehensive Plan Amendments



and Adoption. This is a multi- year project beginning in May 2008 and ending in September 2010.

The purpose of the EOA, which is the first task the City will be undertaking, is to identify likely industrial and other economic development opportunities and short and long term (20 year) employment land needs. The Prison and Grain Millers' sites are currently outside the city's UGB. In order to ensure Grain Millers remains in Lane County, a UGB expansion for Junction City is necessary.

Legally, by statute and DLCD rule, the projected population relied upon by the City for a UGB expansion must reflect the coordinated population number in the County's Rural Comprehensive Plan. There is no such number, currently. Practically, for the City to begin its OEA analysis (i.e., project employment lands needs), a coordinated population forecast is essential. All other tasks in the city's customized periodic review process require a coordinated population that reflects current and long term growth trends for Junction City. The Safe Harbor numbers are not reflective of growth expected for Junction City and would result in a **disastrous under-sizing** of all City services to support the real impacts of the population we will be serving!

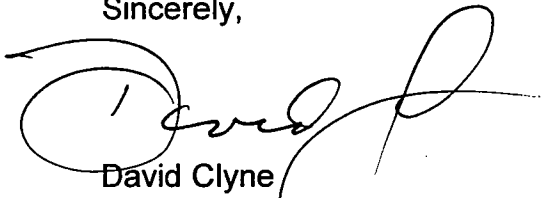
- The City is also conducting water and sewer facility planning for the prisons and hospital. The water and sewer facility planning is part of an intergovernmental agreement between the City and the Department of Corrections (DOC). It is required to be completed by the beginning of 2009 to meet DOC's critical construction deadlines (which may have to be advanced due to the Mannix measure) to construct its minimum and medium security facilities at the Junction City location. This analysis includes potential growth beyond the two state facilities. In order to be accurate when sizing for future sewer and water facilities, the city requires a realistic future population figure not provided by and seriously understated by the Safe Harbor approach.

The City understands the resolution by the County Commissioners at the April 30, 2008 meeting directs that requests to conduct a coordinated population forecast earlier than the next County periodic review must comply with the requirements of Lane County Code (LCC) 16.400(9). In discussions with Lane Land Management Division's department head Kent Howe, he agrees with the City's perspective that this Code provision is inadequate to address the adoption of a coordinated population forecast. This is because special purpose plans are defined by LCC 16.400(4)(b), which does not include coordinated population forecasts.

As an alternative, County staff pointed the City to Rural Comprehensive Plan amendments initiated under LCC 16.400(8). Such amendment proposals may be initiated by the County or by individual application. Junction City hereby requests Lane County to either initiate a major amendment of the County's Rural Comprehensive Plan under LCC 16.400(8)(b) or to coordinate with other Lane County cities to join in payment of the application and process costs for such an amendment. Process costs could include a peer review analysis of Lane Council of Government's coordinated population forecast numbers from an unbiased third party, such as Portland State University. Junction City proposes cost-sharing with all involved governments on some type of prorated basis.

Please consider this as Junction City's official request for the County to initiate, or to coordinate with Lane County cities to initiate, the Rural Comprehensive Plan major amendment needed to provide coordinated population numbers to other affected Lane County cities and the City of Junction City to address the above delineated issues.

Sincerely,



David Clyne
City Administrator
City of Junction City

- cc: Mayor and City Council
Carrie Connelly, City Attorney
Kay Bork, Planning Director
Jeff Spartz, County Administrator
Matt Laird, County Land Use Manager
Kent Howe, County Planning Director