

FILED

BEFORE THE BOARD OF COUNTY COMMISSIONERS

FOR MARION COUNTY, OREGON

1979 AUG -2 PM 12:55

EDWIN F. MORGAN, CLERK
Morgan
DEPUTY

In the matter of adopting an Urban Growth }
Boundary for Aurora, Oregon. }

RESOLUTION

This matter came before the Board of Commissioners, hereinafter called "Board", on its own motion; and

IT APPEARS AS FOLLOWS:

(1) The City of Aurora, on April 9, 1979, adopted by Ordinance No. 251, a comprehensive plan and urban growth boundary. Following the adoption of the boundary and plan the city requested that Marion County agree to their urban growth boundary and adopt the city's land use plan for the area inside the boundary.

(2) ORS 197.190 requires counties to coordinate planning activities effecting land uses within the county and ORS 197.250 requires all comprehensive plans and implementing ordinances adopted by a city or county to conform to the statewide planning goals. Therefore in reviewing the request made by the city, it is the county's responsibility to determine that the urban growth boundary adopted by the city was developed in conformance with the statewide goals.

Goal 14 states that establishment and change of a boundary shall be based upon considering the following factors: Demonstrated need to accommodate long-range urban population growth requirements consistent with LCDC goals; need for housing, employment opportunities and livability; orderly and economic provision for public facilities and services; maximum

MARION COUNTY COURTHOUSE
SALEM, OREGON 97301
TELEPHONE 588-5220

1 efficiency of land uses within and on the fringe of the existing urban
2 area; environmental, energy, economic and social consequences; retention of
3 agricultural land as defined, with Class I being the highest priority for
4 retention and Class VI the lowest priority; and compatibility of the proposed
5 urban uses with nearby agricultural activities.

6 The results of the above considerations must be included in the
7 comprehensive plan.

8 In an attempt to evaluate the Aurora Comprehensive Plan and urban
9 growth boundary for conformance with the statewide planning goals the
10 Marion County Planning Coordinator prepared a compliance review. Based on
11 that review and the testimony received by the Board of Commissioners, the
12 county has identified the following findings.

13 FINDINGS

14 1. The goals state that the boundary must include the amount of land
15 needed to accommodate population growth requirements for the planning period.
16 The Aurora boundary however, was designed to accommodate a target population
17 which may not be realized in the next 20 years. Population projections in the
18 plan are also based on the assumption that a sewer system will be in place in
19 five years. The Department of Environmental Quality has indicated that no
20 health hazard has been identified in Aurora and therefore federal funds would
21 not be available to the city to construct a sewer system.

22 2. In providing for future employment opportunities, it appears that the
23 commercial and industrial land that has been included in the boundary south and
24 northwest of the city limits is justified.

25 To determine the amount of land needed for housing, an accurate
26 population projection must be developed.

1 The city presently has no sewer system and there is no assurance that
2 such a system will be constructed in the near future. Therefore, if development
3 continues on septic systems, the average annual growth rate will probably not
4 vary considerably. If the city does continue to grow at the average rate (5%)
5 the population would increase to 1651 by the year 2000.

6 Based on a population increase of 1065 persons in the next 20 years
7 and the assumption in the plan that the average household size will increase
8 from 2.75 to 3.5 persons, there will be a need to construct 304 housing units
9 during that period.

10 A sanitarian of the DEQ has indicated that, based on the prime soils
11 in the Aurora area, the average lot size needed to accommodate a house, drain
12 field and replacement area would be 18,000 square feet or approximately 2.5 to
13 2.5 units per acre. This indicates that the city should include 122 acres of
14 buildable land in the urban growth boundary. If a market factor of 25% (30
15 acres) is included as well as a few additional acres to allow for development
16 limitations in hazard areas and livability, the total number of acres needed for
17 residential development in the Aurora urban growth boundary is approximately 16
18 to 170 acres. The plan and boundary adopted by the city includes an additional
19 290 acres for residential development.

20 3. It appears to the Board premature to assume that the City of Aurora
21 will have a sewer system in the near future. Growth will therefore continue at
22 septic tank densities. Discussion in the compliance review indicates that the
23 present water system may not be adequate to accommodate a population greater
24 than 1000 people. There are no plans mentioned to expand the system. Based on
25 this information, it seems unlikely that the city would be in a position to
26 provide urban services to the land south and east of the airport.

1 4. In order to plan for the most efficient use of the land, the city
2 should have included the amount of land needed to accommodate the projected
3 population increase without a sewer system. The amount of land needed to
4 accommodate the increased population that could be served by a sewer system
5 should also be estimated. Due to the increase in density which would occur
6 (from 2.5 to approximately 5 units per acre) and the availability of multi-
7 family housing, the acreage needed with or without a sewer system could be
8 fairly similar.

9 5. The city failed to consider the environmental, energy, economic and
10 social consequences of the proposed boundary.

11 6. Most of the land included in the urban growth boundary is presently
12 agricultural use and has Class I, II and III soils. The goals require that
13 agricultural land with productive soil capabilities be retained in agricultural
14 use unless a need can be demonstrated for its inclusion in the boundary. The
15 compliance review concludes that that need is not adequately justified in the
16 plan.

17 7. The plan makes no effort to insure compatibility between the proposed
18 urban uses and the nearby agricultural land.

19 CONCLUSIONS

20 Based on the preceding findings, the county does not believe that the urba
21 growth boundary developed by the city can be justified or that the county can
22 agree to the proposed boundary.

23 In an effort to resolve an issue that has been discussed by the city and
24 county for a number of years, and because of the need to formally indicate an
25 urban growth boundary which Marion County could agree to for the City of Aurora
26 the Board of Commissioners has adopted the boundary outlined in dots as opposed
to the city's plan which is identified by squares on Exhibit B which is attache


1 hereto and by this reference made a part hereof. In drawing the boundary, the
2 county has attempted to include the number of areas which can be justified base
3 on the factors in the statewide goals and guidelines. The actual location of
4 future residential areas is not of major concern to the county due to similar
5 soil types throughout the area.

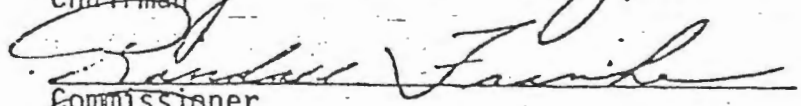
6 It is in the interest of both the City of Aurora and Marion County to
7 resolve the question of the location of the Aurora Urban Growth Boundary. If
8 after reviewing the boundary and resolution adopted by the county, the city is
9 not willing to revise their original proposal, the county is willing to present
10 the issue to the Land Conservation and Development Commission with a request for
11 mediation.

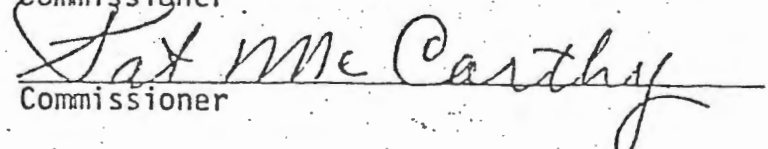
12 NOW, THEREFORE, BE IT AND IT HEREBY IS RESOLVED that the matter of the
13 location of the Aurora Urban Growth Boundary be forwarded to the State Land
14 Conservation and Development Commission for final determination.

15 Dated at Salem, Oregon, this 1st day of August, 1979.

MARION COUNTY BOARD OF COMMISSIONERS

17 
18 Chairman

19 
20 Commissioner

21 
22 Commissioner

MARION COUNTY LEGAL COUNSEL
MARION COUNTY COURTHOUSE
SALEM, OREGON 97301
TELEPHONE 588-5220

Replacement Section, last paragraph on page 12 through the middle of page 19.

Excluding the LR-1 zone, approximately 71% of the community's developed land is devoted to residential uses. Of this, nearly 67 acres is zoned R-1, single family residential. In this zone, a single family home may be constructed on a minimum 7,500 square foot lot, for a maximum density of nearly 6 units to the gross acre; duplexes on larger lots are permitted conditionally. In the R-2 zone, two-family residential, smaller lot minimums permit development of single family and duplex residences at a density of nearly 7 units/gross acre; mobile home parks and sub divisions are conditional uses. However, currently only one 6 acre parcel, the site of an existing mobile home park, has been designated as R-2.

Although the city's zoning code permits residential development at urban densities, the lack of a public sewer system severely constrains small lot development. As noted earlier, poor soil conditions and the state's double drainfield requirement limit development to a maximum of three units per gross acre.

CONCLUSIONS

Projected population

The city's anticipated population growth is a critical determinant of its future urban land use requirements. Reflecting the appeal of small town living, Aurora has experienced a 5.6% average annual growth rate since 1970, although most of this occurred in the first half of the decade. Based on its own rapid growth, in its 1979 comprehensive plan Marion County projected an average

growth rate of 5.8 percent per annum for all of the incorporated areas within its jurisdiction*. With regard to Aurora, this projection is already overly optimistic. By 1980, the county predicted Aurora would have 640 residents although it had only 523, according to the 1980 census. In view of this, the city has selected a more conservative growth rate of 4%, to reflect development constraints imposed by the lack of a public sewer system and recent poor economic conditions.

Although the community is committed to having an operational sewer system by the year 1991, it is impossible to predict with accuracy the demographic and economic conditions which will prevail at that time. This plan has been prepared on the assumption that the city will remain unsewered until the turn of the century. When such service becomes available, the city will initiate a special plan update to reevaluate its population estimates and land use needs.

In Table 6, projected population growth for the next 20 years is presented:

TABLE 6
PROJECTED POPULATION GROWTH (1980-2000)

<u>1980</u>	<u>1985</u>	<u>1990</u>	<u>1995</u>	<u>2000</u>
523	636	774	942	1146

* Based on population projections prepared for the Section 208 Water Quality Planning Program in 1979.

Projected Urban Land Needs

Assuming an annual growth rate of 4%, Aurora's population will more than double in the next two decades to 1,146, an increase of 623 residents. To accommodate their residential, commercial and employment needs, the city must identify and designate sufficient additional land for urban development.

It is estimated that the City of Aurora will require an additional 125 acres of residential land, based on the following assumptions:

- By the year 2000, an additional 240 dwelling units will be required to accommodate a population growth of 623, assuming an average household size of 2.6 persons.
- Recognizing the need to increase housing choice, the city will encourage the following mix of new housing types; 65% single family, 20% multi-family, and 15% mobile home units. The exiting housing stock is characterized by a 70%/10%/20% mix of types.
- With proposed modifications, the zoning code will provide for a variety of housing types at urban densities. However, in the absence of a public sewer system, it is the state's septic permit requirements, not the zoning code, which will dictate minimum residential lot sizes.

With regard to the last assumption, the county sanitarian determines the minimum sized drainfield necessary for the adequate treatment and absorption of wastes, based on the dwelling type, septic tank size, soil and slope conditions, and other factors.

Furthermore, to comply with DEQ's double drainfield requirement, adopted in 1974 as a public health measure, a lot must contain enough additional land to accommodate a backup drainfield should the original one fail. This effectively doubles the minimum lot size required for a septic permit.

Due to poor soil conditions in Aurora, DEQ engineers at the Salem field office estimate that the minimum lot size of 19,000 square feet is necessary to accommodate a single family dwelling.*

However, in its "shadow subdivision" provisions, the city will adopt a minimum lot size of 22,500 square feet, to allow redevelopment into three 7,500 square foot or four 5,000 square foot lots. In this way, the city can insure the achievement of urban densities once sewers are available.

Minimum drainfield requirements for duplex and triplex units are less stringent because these generally accommodate smaller households. For example, the average duplex unit can be accommodated on 16,000 square feet. Therefore, a duplex can be built on a 3,200 square foot lot, for a maximum of 2.8 units per gross acre. Similarly, each unit in a triplex requires about 15,200 square feet for a total lot size requirement of about 45,000 square feet; this is slightly more than one acre.

* If platted before 1974, lots averaging 14,000 square feet may obtain septic permits under state regulations. However, because most of the property within the UGB suitable for future residential development has not yet been platted, the more stringent state requirements must be applied.

On the other hand, a mobile home is subject to the same lot minimums as a conventional single family dwelling. As the city does not permit the siting of mobile homes on individual lots but confines them to parks and subdivisions, this land requirements may inhibit the provision of this type of housing. However, in developments of 40-50 or more units, a "packaged" or community sewer treatment system is both a technically and economically feasible alternative. Required to meet stringent DEQ water quality standards, wastewater could be discharged into the Pudding River or used to irrigate nearby agricultural acreage. Furthermore, the agency requires that such a system be designed for later integration into a municipal system. The city also will consider proposals to sewer conventional subdivision providing these do not hamper efforts to construct a city-wide system.

Based on assumptions about the total number of units needed, the selected housing mix, and minimum lot size requirements, the allocation of new housing by type is summarized in Table 7. As noted, the city will require an additional 100 gross acres to meet its year 2000 housing needs. As this does not include land needed for public streets and utility corridors, an additional 25% must be added, for a total of 125 acres.

In Table 8, this housing need is allocated by zone. It is assumed that almost all single family and half of the duplex units will be constructed in the R-1 zone, requiring 94 acres, or 75%, of the total. An additional 31 acres of R-2 will be necessary to

accommodate the remaining single family and duplex units as well as all triplexes and mobile homes. As indicated in both Tables 7 and 8, it is assumed that six apartments will be built on the second floor commercial buildings thus, not requiring acreage in residential zones.

* The city can recover all maintenance and repair costs through user fees and special assessments to system users.

TABLE 7
ALLOCATION OF HOUSING BY TYPE

<u>Type</u>	<u>% of Total Stock</u>	<u># Dwelling Units (DU)</u>	<u>Number of Buildings</u>	<u>Minimum Lot Size/DU (sq. ft.)</u>	<u>DU/Gross Acre</u>	<u>Total Gross Acres</u>
Single Family ^a	65	153	-	22,500 ^b	1.9	81
Multi-Family	20	48				15
Duplex	10	24	12	16,150 ^c	2.8	9
Triplex	7.5	18	6	15,200 ^d	2.9	6
Apartments ^e	2.5	6	-	-	-	-
Mobile Home	<u>15</u>	<u>35</u>	-	5,000 ^f	8.7	<u>4</u>
Total	100	236 ^g				100

a Includes prefabricated housing built to Uniform Building Code (UBC) specifications

b Minimum lot size required in "shadow subdivision" provisions to permit redevelopment into three 7,500 square foot lots.

c Assumes septic drainfield requirement for each unit in duplex to be 85% of that for single family unit. (.85 x 19,000 square feet).

d Assumes septic drainfield requirement for each unit in triplex to be 80% of that for single family unit (.80 x 19,000 square feet).

e Assumes constructed on second floor of commercial structures; no residential acreage required.

f Assumes packaged sewer treatment system.

g Does not include 4 units which can be accommodated on lots within the city limits for which septic permits have already been obtained.

TABLE 8
ALLOCATION OF HOUSING BY ZONE

<u>Zone</u>	<u>Type</u>	<u># DU</u>	<u>Gross Acres</u>	<u>Total Acres^a</u>
R-1	Single Family	133	70.0	87.5
	Multi-Family Duplex	14	5.0	6.5
	TOTAL	147	75.0	94.0
R-2	Single Family	20	11.0	13.5
	Multi-Family Duplex	10	4.0	4.0
	Triplex	18	6.0	7.5
	Mobile Home	35	4.0	5.0
	TOTAL	<u>83</u>	<u>25.0</u>	<u>31.0</u>
TOTAL		230 ^b	100.0	125.0

^a Allows additional 25% acreage to accommodate streets and utility corridors

^b Excludes 6 units allocated to commercial zone; see Table 7

With regard to non-residential uses, Aurora has 9.3 acres of commercial and nearly 6 acres of industrial development. In addition, there is nearly 18 acres of vacant commercial (including LR-1 property) and 10 vacant acres of industrial land within the city limits. Almost all of this is located between Highway 99E and the Southern Pacific Railroad right-of-way.

According to the Oregon Department of Economic Development (DED), there are no highly refined measures for predicting a small community's future commercial/industrial needs. Under these circumstances the best method is to project need based on the current ratio of developed land to population. The city anticipated that its population will increase by 120% by the turn of the century, resulting in the need for an additional 11 acres of commercial and seven acres of industrial property. While this is less land than currently available within the city limits, part of the latter contains slopes which exceed 6% to 10%, considered to be undersirable by many commercial and industrial developers.

Furthermore, straight-line extrapolation fails to take into consideration several other important factors:

- o As the city continues to grow, there will be sufficient population to support a broader range and number of current activities. This will result in the local provision of some goods and services which must be obtained in surrounding larger towns.

TABLE 9
LAND USE WITHIN UGB

	ACRES			<u>Total</u>
	<u>Developed</u>	<u>Vacant^a</u>	<u>Floodplain/ Natural Hazard</u>	
Within City Limits ^b	80.4	43.2	-	123.6
Outside City Limits ^c	36.2 ^d	167.8	37.5	241.5
	<hr style="width: 50px; margin: 0 auto;"/>	<hr style="width: 50px; margin: 0 auto;"/>	<hr style="width: 50px; margin: 0 auto;"/>	<hr style="width: 50px; margin: 0 auto;"/>
	116.6	211.0	37.5	365.1

a Assumes generally suitable for urban development

b See Table 5 for detailed land use

c Currently under jurisdiction of Marion County, zoned for exclusive farm use (EFU). Will not be zoned for urban uses until annexed by the city.

d Includes 13 acres of non-residential uses, including Pioneer Cemetery, Calorwash Nursery, and the North Marion Baptist Church, and 23.2 acres of residential development. The latter was calculated by allowing for a 14,000 square foot lot, the average required for a septic permit, for each pre-existing residence located on a larger parcel; remainder considered vacant.

- o The lack of a public sewer system dictates larger lot development than required in sewerred communities. Since much of the existing commercial and industrial base was developed prior to the institution of the state's double drainfield requirement in 1974, it does not reflect minimum lot sizes now required.
- o Highway 99E is the city's major link to the rest of the region; most of the existing and proposed vacant commercial/ industrial property is located on this state highway. Maximum utilization of this transportation corridor is both in the city's and region's best interests.
- o To offset the development constraint imposed by the lack of sewers, the city wishes to provide developers with a wide range of suitably sized and located parcels.

To account for these factors, the need for an additional 15 acres of commercial and 35 acres of industrial land is projected.

Urban Growth Boundary

In August 1979, the City of Aurora and Marion County signed an agreement to establish a new, smaller urban growth boundary than had been proposed by the city in its original comprehensive plan. As indicated in Table 9, there are 365 acres of land within the UGB, approximately 200 acres of which is vacant.

*Findings on UGB
-10- to follow on pg. 12*

TABLE 10
COMPARISON OF VACANT LAND IN UGB AND PROJECTED NEED

LAND USE	ACREAGE			Projected Need
	Vacant Land			
	Inside City	Outside City	Total	
Residential	15.5	116.8	132.3	125.0
R-1	xx.x	xx.x	xx.x	94.0
R-2	xx.x	xx.x	xx.x	31.0
Commercial	17.8* **	14.7	32.5	26.0
Industrial	<u>9.9**</u>	<u>36.3</u>	<u>46.2</u>	<u>42.0</u>
TOTAL	43.2	167.8	211.0	193.0

* Includes land currently zoned LR-1, see Table 5.

** Portion of vacant commercial/industrial land in city not suitable for development due to slopes exceeding 6-10%.

Full 1000 Friends
add
Mission to resolution
Commit

CITY OF AURORA



**MARION COUNTY
PLANNING DEPARTMENT**

LAND USE PLANNING
ZONING & SUBDIVISION
588-5038

COMMUNITY DEVELOPMENT
588-5345 or 5326

Senator Building, 220 High St. N.E. Salem, Oregon 97301

December 28, 1982

DEPARTMENT OF LAND
CONSERVATION AND DEVELOPMENT

DEC 29 1982

SALEM

Dan Heffernan
Dept. of Land Conservation and Development
1175 Court Street NE
Salem, OR 97310

Dear Dan:

I have reviewed the "City of Aurora Revised Comprehensive Plan, October 1982" and would like to express the County's support for acknowledgement of the revised Plan. The City has devoted a great deal of time and effort in addressing the concerns expressed by LCDC on March 20, 1981.

The City and the County have worked together this year to formulate a revised urban growth boundary agreement which is consistent with the new Plan. Also, at the City's request, the County adopted a resolution dated December 1, 1982 which agrees to maintain the EFU (Exclusive Farm Use) zone within the Aurora UGB until annexed by the City and to revise the County's population projections to coincide with those in the Aurora Plan.

Marion County supports the acknowledgement of the "City of Aurora Revised Comprehensive Plan".

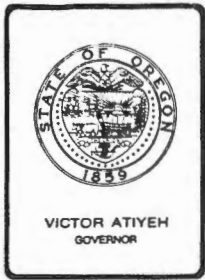
Sincerely,

Keith S. Liden, J.P.
Keith S. Liden
Associate Planner

KSL/tjt

L

DS
gw



dy

Hand carried late

dy

Department of Transportation

TRANSPORTATION BUILDING, SALEM, OREGON 97310

July 13, 1982

IN REPLY REFER TO
FILE NO.: PLA 16-9

DEPARTMENT OF LAND
CONSERVATION AND DEVELOPMENT

JUL 14 1982

SALEM

The Honorable Rod Yoder
Mayor of Aurora
P. O. Box 108
Aurora, OR 97002

The Department of Transportation has reviewed the portions of Aurora's plan which have been resubmitted to LCDC.

Our earlier concerns regarding historic preservation have been addressed and we are pleased to support acknowledgment of the City's plan.

We appreciate your cooperation and look forward to working with the City on future land-use matters.

L. W. Rulien
Assistant Director
for Administration

dn

cc: Pam Brown (Marion County)
Jim Ross/Dan Jefferman
Greg Winterowd
Paul Taylor

gw
df
jnc

1000 d3

BEFORE THE BOARD OF COMMISSIONERS
FOR MARION COUNTY, OREGON

DEC 3 9 35 AM '82

In the Matter of the Comprehensive)
Plan and Zoning in the unincorpor-)
ated portion of the Aurora urban)
area)

EDWIN P. MORGAN
MARION COUNTY CLERK

BY ph DEPUTY

RESOLUTION

WHEREAS, Marion County and the City of Aurora have adopted Comprehensive Plans and an Urban Growth Boundary for the Aurora area to guide future growth and development; and

WHEREAS, the City is seeking acknowledgment of its Plan from the State Land Conservation and Development Commission; and

WHEREAS, the County adopted population projections for each municipality and the unincorporated area as part of its Comprehensive Plan; and

WHEREAS, the City will not install a public sewer system in 1985 as previously planned, thereby limiting the potential for additional population growth, and accordingly the City has reduced its projected population growth rate to four percent per year; and

WHEREAS, the City and the Land Conservation and Development Commission would like assurances that the present EFU (Exclusive Farm Use) zone within the Aurora Urban Growth Boundary will be maintained until the land is annexed and rezoned by the City; now therefore

BE IT RESOLVED that, when the Marion County Comprehensive Plan is revised, the population projection for Aurora will be reduced to reflect an annual growth rate of four percent, using 1980 census information as a base, and

BE IT FURTHER RESOLVED that the County will retain EFU zoning in the Aurora urban area as a holding zone to ensure that no incompatible development or premature urban development occurs prior to City annexation and provision of services.

Dated at Salem, Oregon this 1st day of December, 1982.

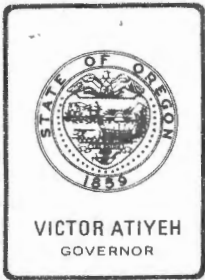
DEPARTMENT OF LAND
CONSERVATION AND DEVELOPMENT
DEC 7 - 1982
SALEM

MARION COUNTY BOARD OF COMMISSIONERS

Samuel
Chairman

Randolph Franke
Commissioner

Henry Carson Jr.
Commissioner



Department of Environmental Quality

522 SOUTHWEST 5TH AVE. PORTLAND, OREGON

MAILING ADDRESS: P.O. BOX 1760, PORTLAND, OREGON 97207

January 28, 1981

DEPARTMENT OF LAND
CONSERVATION AND DEVELOPMENT

JAN 29 1981

SALEM

- W. J. Kvarsten, Director
Department of Land Conservation
and Development
1175 Court Street, N.E.
Salem, OR 97310

Re: Objection - Aurora Acknowledgement

Dear Mr. Kvarsten:

The Department reluctantly objects to LCDC Acknowledgement of the Aurora Comprehensive Plan because of deficiencies related to Goals 6 and 11. The attached memo sets out in detail the basis for our objection, along with our perception of what is needed to remedy the objection.

We look forward to working with the City in the future to address these concerns.

Sincerely,

William H. Young
Director

MC:f

MF53

Attachment

cc: City of Aurora
Pam Brown, Local Coordinator
Craig Greenleaf, DLCD Field Representative
Jim Claypool, DLCD
Field Division Secretary, DLCD
DEQ AQ
DEQ WQ
DEQ SW
DEQ NC
DEQ WV, Jon Gjertsen

STATE OF OREGON

DEPARTMENT OF ENVIRONMENTAL QUALITY

INTEROFFICE MEMO

TO: Mitch Rohse, DLCD

DATE: January 28, 1981

FROM: Maggie Conley, DEQ

SUBJECT: Objection to Acknowledgement Request - Aurora

The Department has completed its review of the Aurora Comprehensive Plan. We believe that the plan is insufficient for acknowledgement with respect to Goals 6 and 11, and object to the plan's acknowledgement at this time. DEQ submitted comments on the Aurora Draft Plan in 1979. Though the City did address DEQ's comments on solid waste, they did not address our concerns about air quality. After our review of the adopted plan, we have found some additional problems not previously noted during the draft review of the plan which must be addressed to bring the plan into compliance with the goals.

Goal 6

Noise is adequately inventoried in the Aurora State Airport Master Plan which has been adopted by the City as a plan element. Other than the airport, there are no major noise sources in the planning area. The plan, however, does not contain a policy related to noise sources which commits the City to comply with state noise statutes.

The plan also contains no inventory information or policies related to air and water quality.

In order to comply with Goal 6, we find that the City must:

1. Amend the plan to include an inventory of air and water quality.
2. Amend the plan to include plan policies committing the City to protect air, water and land quality and comply with State and federal regulations related to air and water quality and noise.

Goal 11

The plan contains a good inventory of solid waste disposal. There is, however, no policy to coordinate future solid waste planning with Marion County.

The Department has determined that in order to comply with Goal 11, the City must:

Amend the plan to include a policy to coordinate future solid waste disposal planning with Marion County.

Comment

The City should mention in the plan that no future industrial uses will be able to develop in Aurora without a sewage treatment facility. There are no health hazards in the planning area at present due to residential and commercial development on subsurface sewage disposal systems. However, since industrial development on subsurface disposal systems would probably cause a health hazard, it is very unlikely that any subsurface permits will be issued for industrial uses. Until the City is able to construct a sewage treatment facility, industrial growth will be limited.

MC:g
RG121 (1)

MR

1000 FRIENDS OF OREGON

400 DEKUM BUILDING, 519 S.W. THIRD AVENUE, PORTLAND, OREGON 97204 (503) 223-4396

DEPARTMENT OF LAND
CONSERVATION AND DEVELOPMENT

January 26, 1981

JAN 28 1981

Mr. W.J. Kvarsten, Director
Department of Land Conservation
and Development
1175 Court Street NE
Salem, OR 97310

SALEM

Subject: City of Aurora Request for Acknowledgment of Compliance

Dear Mr. Kvarsten:

1000 Friends of Oregon objects to LCDC acknowledgment of the city of Aurora's comprehensive plan and implementing measures as in compliance with the statewide planning goals. Our review of Aurora's plan shows that it fails to satisfy any applicable statewide planning goal, with the possible exception of Goal 1. Our specific objections will relate only to Goals 2 (Land Use Planning), 10 (Housing), 11 (Public Facilities and Services) and 14 (Urbanization), due to limited staff time.

1000 Friends of Oregon made its objections known to the city of Aurora in letters dated December 1, 1977; May 8, 1978; June 7, 1978; June 30, 1978; January 4, 1979; and May 31, 1979; and at public hearings before the city on this matter.

GOAL 2

1. Goal 2 requires cities to "establish a land use planning process and policy framework as a basis for all decisions and actions related to use of land..." Aurora's comprehensive plan contains plan policies for only one goal - Energy Conservation - and those policies are so weak as to be virtually meaningless. Thus, Aurora's submittal can hardly be called a "comprehensive plan."

2. Goal 2 requires that city comprehensive plans "assure an adequate factual base" for land use decisions and actions. It further requires that implementing measures be consistent with and adequate to carry out the plan.

Aurora's factual base is inadequate. As explained in our Goal 14 objections, the city's population projection is unjustifiably high. The city's land use needs analysis (p. 15, Tables 6, 7) includes far more land than can be justified. And the city's projected needs involve twice as much land as is contained in its urban growth boundary. There is no consistency between the land use needs data and the UGB, and no justification in this plan for either.

Copied to MR, CB

3. The comprehensive plan map shows two residential designations: low density residential and medium density residential. The low density residential designation allows construction at up to six units per acre. The medium density designation allows construction at up to 24 units per acre.

For the low density residential designation there are two residential zones. One of these zones requires a minimum lot size of 50,000 square feet. The plan contains no adequate justification for such a lot size, which violates Goals 10 and 14. As the Commission has recognized in its reviews of the plans of the cities of Stanfield and Oakridge, one-acre lots do not constitute an urban use of land and can discourage needed housing types.

GOAL 10

1. Goal 10 requires cities to inventory buildable lands for residential use. Buildable lands are lands which are suitable, available and necessary for residential use. The plan contains no buildable lands inventory nor does it state how much land is zoned for various land uses.

2. LCDC's housing policy requires cities to permit needed housing types outright or under clear and objective standards in a zone or zones with sufficient buildable land to meet the identified need. The city of Aurora currently projects a need for 69 additional mobile home units to the year 2000. However, the city's zoning ordinance does not permit mobile homes outright in any of its residential zones. Mobile homes are allowed only as conditional uses in the R-2 zone.

This approach would not violate Goal 10 if the conditions were clear and objective and could not be used to discourage or prevent the availability of this needed housing type. However, the conditions which may be imposed under Aurora's ordinance are not of a nature to assure the availability of this needed housing type consistent with Goal 10. The conditions which Aurora may impose on mobile home development are unlimited in scope and could easily serve as a device to unreasonably increase mobile home costs or to deny the use altogether. The ordinance provides:

"In permitting a conditional use or the modification of a conditional use, the commission may impose in addition to the standards and requirements expressly specified by this ordinance, any additional conditions which the commission considers necessary to protect the best interests of the surrounding property or the city as a whole." Zoning Ordinance, p. 31.

To comply with Goal 10, Aurora must allow mobile homes outright or under clear and objective standards that are limited in scope. To the extent vague language cannot be avoided, qualifying language is necessary to assure adequate opportunity for the provision of this housing type. City of Tualatin Continuance Order.

3. As noted below under Goal 14, the city's population projection is much too high. Thus, the number of "needed" housing units must be scaled down. Revised housing needs projections must also be consistent with what people in Aurora and the region can afford.

GOAL 11

Goal 11 requires cities to "plan a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban and rural development." Development in this manner avoids the unnecessary and premature consumption of valuable agricultural lands for urban uses and halts costly, wasteful sprawl.

There is no indication that Aurora can provide the public facilities necessary to support urban development. The city does not have a sewer system. There is no indication that Aurora will get such a system in the foreseeable future. Plan, p. 26-27. Unless Aurora can provide urban services, sprawl-type development will spread onto the Class II agricultural soils that surround the city.

Until the city is committed to and capable of providing urban level facilities and services, its UGB should not extend beyond city limits. Expansion of the UGB under current conditions would violate Goals 3, 11 and 14.

GOAL 14

1. The City of Aurora projects a population increase from its present 535 to 3,000 by the year 2000. This represents a 7.8 percent annual growth rate. However, Aurora has not justified this six-fold increase in population. In fact, Aurora's population is considerably in excess of the 208 Water Quality Projection (1,005) and the projection of the Mid-Willamette Valley Council of Governments (1,271). The plan contains no reasonable factual justification for its inflated population projection. 1000 Friends assumes it was used in an effort to justify inclusion of the airport within the city's UGB.

Mr. W. J. Kvarsten
January 26, 1981
Page 4

2. Goal 14 requires cities to establish urban growth boundaries based upon a "demonstrated need to accommodate long-range urban population growth requirements consistent with LCDC goals."

The city has not adequately demonstrated a need for a UGB of 425 acres. The city has not demonstrated that it could service any UGB beyond its city limits. The city's UGB does not provide for the maximum efficiency of land uses within and on the fringe of the existing urban area. In short, the UGB is not in compliance with any of the seven factors in Goal 14.

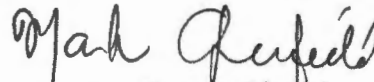
To comply with Goal 14, the city must prepare a needs projection consistent with LCDC goals. In doing so, the city must base residential land need projections on justifiable population projections and on urban level densities consistent with Goal 10. Until the city adopts a realistic population projection, it is impossible to tell how much excess land is contained in Aurora's present UGB.

CONCLUSION

Aurora's plan requires a complete overhauling to put it in compliance with the statewide goals. 1000 Friends is concerned that the four months provided under a continuance order would not be adequate time for Aurora to complete the job properly.

Aurora's plan violates virtually every applicable goal. The plan lacks plan policies which commit the city to particular goals and objectives consistent with the statewide planning goals. The plan lacks an adequate factual base. Thus, it may be necessary for LCDC to deny, rather than continue, acknowledgment for the city of Aurora.

Very truly yours,



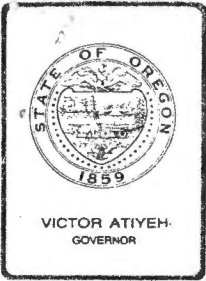
Mark J. Greenfield
Staff Attorney



Carol Ann Goon
Plan Reviewer

MJG/CAG/eec

cc: Fred Saxton, Mayor; Pam Brown, Marion County Coordinator;
Kathryn L. Jeskey, City Recorder



Department of Transportation

TRANSPORTATION BUILDING, SALEM, OREGON 97310

January 29, 1981

handcarry 4:30

MR 1/29

DEPARTMENT OF LAND
CONSERVATION AND DEVELOPMENT

JAN 29 1981

SALEM

IN REPLY REFER TO
FILE NO.:
PLA 16-9

Mr. Frank A. Ames, Mayor
City Hall
Aurora, OR 97022

Dear Mayor Ames:

Our Department has reviewed your city's comprehensive plan which has been submitted to the Land Conservation and Development Commission for acknowledgment. Through our plan review procedure we evaluate those portions which relate to our Department's transportation and parks and recreation programs. While your plan addresses many of our concerns well, we must object to acknowledgment because of concerns regarding the treatment of historic sites and structures in Aurora.

The Aurora Comprehensive Plan states that one of the goals of the city is *"To preserve and protect sites and structures of historical significance from demolition or alteration that would affect their historical significance."* There does not, however, appear to be further mention of historic preservation in the plan. Historic sites and structures are not inventoried or identified in the plan and there does not appear to be an implementation measure to assure protection of these resources. Both of these would appear necessary to meet the requirements of LCDC goals.

We are especially concerned because of the city's wealth of historic resources. As you are aware, the Aurora Colony was placed on the National Register in 1974. In order to have the Colony nominated to the Register, a list of 21 primary sites and structures was prepared. This list was most recently sent to the City in November 1979. While it is not complete, it would provide a substantial base for a historic inventory.

Our State Parks Division has some federal survey and planning funds which could be made available to the City of Aurora for developing both an inventory and an implementation mechanism to assure protection of historic sites and structures. These funds must be matched by monies from non-federal sources, either public or private. In addition, our State Parks historic preservation staff would be glad to offer guidance to the city in carrying out these tasks. If you are interested in obtaining funds or other assistance we ask that you contact Elizabeth Potter at 378-5001 in Salem.

COPIES TO: MR, CG,
JHC

Mr. Frank A. Ames, Mayor
Page 2
January 29, 1981

In addition to our historic preservation concern, we also have a comment concerning public transportation. When the plan is next revised we ask that you address the needs of transportation disadvantaged persons in your community.

Finally, I would like to express our appreciation for your cooperation regarding our earlier concerns with the Aurora State Airport. In particular, Resolution No. 75 and Ordinance No. 257 fully address our concerns. We look forward to working with you to carry these out.

We would like to be involved in future updates of the plan and ordinances. It will be helpful if you direct information on possible future plan revisions to Chuck Pietrok, our Transportation Planning Representative and Paul Taylor, our Parks Planning Representative. We would also appreciate your sending Chuck notice of any proposed zone changes and subdivision approvals along Highway 99E. Addresses and phone numbers of our representatives are enclosed.

Sincerely,

Robert E. Royer, Assistant Director
Policy and Planning

cc: W. J. Kvarsten/Mitch Rohse
Craig Greenleaf
Pam Brown
Chuck Pietrok
Paul Taylor
Elizabeth Potter



Suite 203
3850 Portland Rd. N.E.
Salem, Oregon 97303
Phone: 364-2470

MR

DEPARTMENT OF LAND
CONSERVATION AND DEVELOPMENT

January 15, 1981

JAN 22 1981

SALEM

Mr. W. J. Kvarsten, Director
Dept of Land Conservation & Development
1175 Court St NE
Salem, OR 97310

Attn: Mr. Mitch Rohse, Lead Reviewer

Re: Objection to Acknowledgment of the Aurora Comprehensive Plan

Dear Mr. Kvarsten:

Oregon Manufactured Housing Dealers Association (OMHDA) has completed its review of the Comprehensive Plan and Implementing Ordinances submitted by the City for Acknowledgment of Compliance.

In general, we found the documents to be well considered. However, we believe that in certain respects the Plan and Ordinance do not comply with the statewide goals. Therefore, we must reluctantly object to LCDC acknowledging the Plan at this time.

We were unable to participate directly in the development of the Plan. However, if LCDC continues the Plan for further work, we will assist the City in correcting the deficiencies noted herein.

I

Goal 2 requires that "The plans shall be the basis for specific implementation measures. These measures shall be consistent with and adequate to carry out the plans."

In comparing the Plan Maps and Zone Maps we noted some conflicts. Areas that have been planned industrial have been zoned for residential uses.

II

Goal 2 and 10 require that vacant buildable lands be inventoried by zone designation. We were unable to find this information in the documents submitted for review. Because manufactured housing is restricted to the R-2 zone, we are particularly interested in knowing whether there is sufficient vacant buildable lands within this zone to accommodate the need for manufactured housing. This information becomes even more important when one considers that this is the only zone in which multi-family dwellings (duplexes) are a permitted use.

III

Goal 2 requires that there be an adequate factual basis for decisions and policy. Goal 10 requires that the need for various types of housing be determined and quantified.

The Plan, at page 15, notes that in 1978 manufactured housing comprised 23% of the Cities total housing stock. Also, at page 15, the Plan projects that by the year 2000 manufactured housing will comprise only 11% of the total housing stock, but that conventional single family dwellings will make up 65% of the total housing stock.

We were unable to find a basis in the Plan to support the assumption that manufactured housing will shrink as a proportion of the housing mix. In fact, this assumption seems to contradict a wealth of other information to the contrary. The Plan itself, at page 16, notes that "The median-income family... cannot afford today's median priced new home." The State Housing Division has information which indicates between 1970 and 1979 manufactured housing has accounted for 20% of all new housing units added to the States housing supply.

The Portland HUD Office has completed a study which shows that only 19% of Portland households can afford the average priced new home, while 48% of Portland residents can afford the average manufactured home and land.

Therefore, we request that the City amend their needs projection or justify the present projection.

IV

Goal 10, as interpreted by the LCDC Housing Policy, requires that needed housing not be subjected to vague and discretionary conditional use approval criteria. The Comprehensive Plan, at page 15, notes that manufactured housing is needed within Aurora.

Manufactured housing is not a permitted use within any zone and is a conditional use only in the R-2 zone. As a conditional use, the siting of manufactured housing is subject to § 6.010 of Article VI of the Zoning Ordinance. This section states that "In permitting a conditional use the Commission may impose, in addition to the standards and requirements specified by this Ordinance, any additional conditions which the Commission considers necessary to protect the best interests of the surrounding property or the City as a whole. Clearly § 6.010 violates Goal 10.

In summary, we request that the acknowledgment of this Plan be continued until the City, 1) resolves plan/zone conflicts, 2) inventory vacant buildable land by zone designation, 3) develop new projections on future housing mix and quantify housing need by types of housing and 4) amend § 6.010 of the Zoning Ordinance and permit manufactured housing within a zone(s) with sufficient vacant buildable land.

January 15, 1981

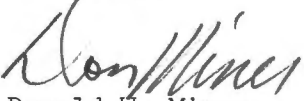
Objection to Acknowledgment of the Aurora Comprehensive Plan

page three

During the continuance we request that you urge the City to consider allowing manufactured housing in subdivisions and upon individual lots (subject to standards).

We appreciate this opportunity to express our concerns. If we can be of further assistance, please feel free to call.

Sincerely,



Donald W. Miner
Staff Attorney

DM:st

cc: Salem/Albany Chapter Dealers
Portland Chapter Dealers
Kathy Keene, Oregon Business Planning Council
Mary Holly, Dept of Commerce, Housing Div
Bill Latham, WMHI
Craig Greenleaf, LCDC Central Office
Pam Brown, Coord. Marion County
Kathryn Jeskey, Aurora City Hall

UNITED STATES DEPARTMENT OF AGRICULTURE

FARMERS HOME ADMINISTRATION

Room 1590, Federal Building, 1220 SW 3rd Avenue
Portland, Oregon 97204

MR

January 16, 1981

DEPARTMENT OF LAND
CONSERVATION AND DEVELOPMENT

JAN 19 1981

SALEM

W. J. Kvarsten, Director
Department of Land Conservation & Development
1175 Court Street NE
Salem, OR 97310

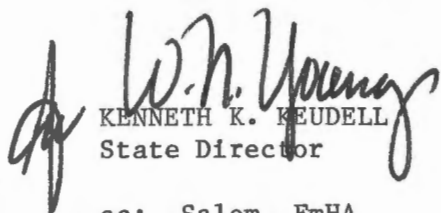
RE: Review of Comprehensive Plan and Ordinances
City of Aurora

Dear Mr. Kvarsten:

Farmers Home Administration has reviewed the comprehensive plan and ordinances for the City of Aurora and has no objection to the Oregon Land Conservation and Development Commission's acknowledgement of the comprehensive plan and ordinances. We find no conflict with Farmers Home Administration policies, or with our plans and projects for the area.

We appreciate the opportunity of making this review, and request that we be provided with a copy of the Department of Land Conservation and Development's Staff Report.

Sincerely,


KENNETH K. KEUDELL
State Director

cc: Salem, FmHA
District Director 2, FmHA

LEV:vt

COPIES TO: MR, CG

MR



United States
Department of
Agriculture

Soil
Conservation
Service

1220 S.W. Third Avenue
16th Floor
Portland, OR 97204

January 28, 1981

DEPARTMENT OF LAND
CONSERVATION AND DEVELOPMENT

FEB 03 1981

W. J. Kvarsten, Director
Dept. of Land Conservation & Development
1175 Court Street, N.E.
Salem, Oregon 97310

SALEM
postmarked 1/28/81
cf

Dear Mr. Kvarsten;

Soil Conservation Service personnel have reviewed the Comprehensive Plan for the City of Depoe Bay, City of **Aurora**, Lincoln County, and the City of Medford.

We have no objections to the plans and feel the goals have adequately addressed the agricultural communities' concerns. There will be no adverse impacts on any SCS plans or projects.

The comprehensive plans are in compliance with our major interests and concerns, that of protection of soil and water resources and retention of important agricultural and forested lands.

Sincerely,

GUY W. NUTT
State Conservationist

COPIES TO: KL, BC, MR
CG, CP, DO, DB,
ML, JHC



The Soil Conservation Service
is an agency of the
Department of Agriculture

SCS-AS-1
10-79

MR

DEPARTMENT OF LAND
CONSERVATION AND DEVELOPMENT

JAN 29 1981

SALEM



Marion Soil and Water Conservation District

1659 25TH S.E. • SALEM, OR 97302 • PHONE 399-5746

TO: LCDC
1175 Court Street N.E.
Salem, OR. 97310

January 26, 1981

FROM: Dennis Koenig
Marion SWCD, Chairman

The Marion Soil & Water Conservation District has reviewed the City of Aurora proposed Comprehensive Land Use Plan. We find no major deficiencies in the plan and we are pleased with the statement in the introduction that the policy in Aurora is to protect agricultural and forestry lands from premature urban development, even within the Urban Growth Boundary.

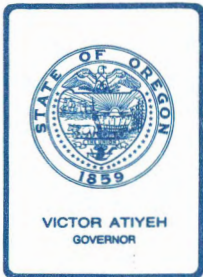
We also applaud the fact that the UGB is limited in extent because there are important farm lands, as well as flood plains, surrounding the city.

We feel the Aurora Comprehensive Land Use Plan is adequate in regard to agricultural and forest lands and natural resources.

Dennis Koenig
Marion SWCD, Chairman

Copies: MR, CB

MR



PUBLIC UTILITY COMMISSIONER OF OREGON

LABOR & INDUSTRIES BUILDING, SALEM OREGON 97310 PHONE (503) 378-6351

January 23, 1981

DEPARTMENT OF LAND
CONSERVATION AND DEVELOPMENT

JAN 26 1981

SALEM

Mr W J Kvarsten, Director
Department of Land Conservation
and Development
1175 Court St NE
Salem OR 97310

Mayor
City Hall
Aurora OR 97002

The Department of Land Conservation and Development (DLCD), by letter dated December 15, 1980, requested that the Public Utility Commissioner review the City of Aurora's Comprehensive Plan prior to its certification by the Land Conservation and Development Commission as being in compliance with ORS Chapter 197 and the Statewide Planning Goals.

That portion of the Comprehensive Plan relating to public railroad-highway crossings has been reviewed. As written, no comment by this agency is necessary.

The Commissioner's statutory responsibilities with regard to grade crossings are found in ORS Chapter 763 and have been summarized in attachments to our agency coordination program which was furnished to the City of Aurora by our letter of June 9, 1978.

The Commissioner will reserve the right to question and disapprove future grade crossing applications or the retention of existing grade crossings included in the Comprehensive Plan if they can be shown to be unnecessary.

It is requested that this agency be informed of your Commission's action on the City of Aurora's Comprehensive Plan.

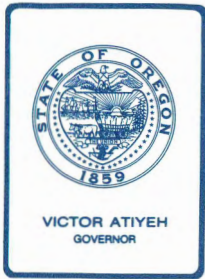
David J. Astle
Assistant Commissioner
Rail-Air Program

fnm/0204F-1

cc: SIR 854, SUB 1
C-Line General File

Copy: MR, CC

MR



Department of Energy

LABOR & INDUSTRIES BUILDING, ROOM 102, SALEM, OREGON 97310 PHONE 378-4040

January 29, 1981

DEPARTMENT OF LAND
CONSERVATION AND DEVELOPMENT

JAN 29 1981

SALEM

Eldon Hout
Field Division Manager
Department of Land Conservation
and Development
1175 Court Street SE
Salem, OR 97310

Subject: Acknowledgement of Compliance Request, The City of Aurora

Dear Mr. Hout:

We have completed a preliminary review of the City of Aurora Comprehensive Plan and implementation measures and do not object to acknowledgement. The plan does establish the foundation for continuing efforts to promote energy conservation and utilize renewable energy resources.

Our preliminary review indicates that additional work is necessary. We are preparing a detailed review of the plan and implementation measures which will include specific action recommendations as well as references to the best available data, case studies, technical studies and model ordinances. We will also provide to the City of Aurora technical assistance and information on services, incentives and funding resources.

Thank you for the opportunity to comment. We look forward to working closely with you and the City of Aurora during the post-acknowledgement period. If you have any questions, please call Henry Markus at 378-2856.

Sincerely,

Lynn Frank
Director

LF/HM:cs
1706B
Y 7-5-3-102
cc: The City of Aurora

COPIES TO: MR,
CG, JHC

OREGON BUSINESS PLANNING COUNCIL

1178 CHEMEKETA, N.E.

SALEM, OREGON 97301

DEPARTMENT OF LAND
CONSERVATION AND DEVELOPMENT
PHONE (503) 370-8112

STAFF:
KATHERINE KEENE
Planning Director

DAVID S. HILL
Natural Resources
Director

January 13, 1981

JAN 13 1981

MR
hand delivered
SALEM 4:30 PM

Mr. Wes Kvarsten, Director
Department of Land Conservation
and Development
1175 Court Street N. E.
Salem, OR 97310

Attention: Mitch Rohse

Dear Mr. Kvarsten:

The Oregon Business Planning Council has reviewed the comprehensive plan and implementing ordinances submitted by the City of Aurora in support of its request for acknowledgment of compliance.

Overall, the documents submitted demonstrate that the city has spent a great deal of time and effort in its planning program. The plan seems generally appropriate in content for the city, however, based on our review we have determined that we must object to acknowledgment of compliance based on Statewide Goals 2, 5, 10 and 11. Regretfully, we were not able to participate in the development of the plan.

Our initial concern relates to Goal 2. The zoning ordinance is not internally consistent. In the Two Family Residential Zone, Sections 3:150.3, Lot Size, and 3:150.7, Density Requirements, seem to conflict. Section 3:150.3(1) says, "... the lot area for a two family dwelling shall be not less than 10,000 square feet." We interpret this to mean that the lot area per family can be a minimum size of 5,000 square feet. Section 3:150.7, however, says, "... the lot area per family shall be not less than 7,500 square feet." We believe this internal inconsistency renders that portion of the zoning ordinance ineffective and does not provide adequate implementation of the city's plan.

A second Goal 2 concern regards the "Baker conflicts" that exist between residential plan designations and commercial and industrial zones. We believe these should be rectified prior to acknowledgment.

Another concern regards Goal 5, We could find no mention of mineral and aggregate resources, Goal 5 compliance necessitates an inventory of resources and resolution of identified conflicting uses. If no mineral and aggregate resources exist, the plan should so state.

copies to MR, CG

Our Goal 10 concerns include several of the factors that comprise Goal 10. We could not find an inventory of existing housing by type. The current housing mix is not clear. Additionally, the Plan Goal that addresses the future housing mix is not clear (p. 14).

"Provide for a balance of low and medium density living areas at a ratio of 75% medium density and 25% high density."

The Goal statement initially refers to low and medium densities, but concludes by referring to medium and high densities.

The plan does not indicate a firm, single figure for the current household size or for the future household size. In 1976 the household size was 2.75 (p. 11), but by 1978 it had, apparently, risen dramatically to 3.1 (p.15, Table 8). The CAC estimates the future household size will be 3.50 (p. 11), but Table 8 indicates it will be only 2.8.

The plan has not adequately projected the number of dwelling units that will be needed by type, nor has it adequately projected the number of buildable acres needed for each housing type. Furthermore, the plan does not show how many buildable acres have been designated and zoned for each housing type.

It also seems that the plan has not addressed residential densities in a consistent manner. The plan (p. 16) indicates that the low density areas should have a density of up to 6 dwelling units/acre and medium density areas should have up to 24 dwelling units/acre. If we assume that the household size is 2.8 (Table 8), then the densities will be up to 16.8 and 67.2 persons/acre. This does not match the plan's 7.5 and 12.5 persons/acre on page 15.

A major reworking of the housing section is needed prior to Goal 10 compliance. Thus, we cannot support acknowledgment at this time.

Our Goal 11, Public Facilities, objection relates to the lack of goals and policies regarding sewer and water facilities. The Public Facilities Section of the plan contains no goals or policy commitment to pursue new facilities, nor to maintain or improve the existing facilities.

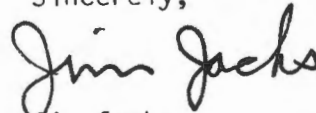
The lack of guidance in the plan relative to a future sewer system is especially significant. Although it is not always entirely clear, the plan, generally, was developed based on the assumption that a sewer system would be in place by the mid-1980s. In this vein the plan tries to

formulate goals and policies and establish land use patterns that recognize the necessity for low density development now, with increasing densities once a sewer system is in place. The plan is not always successful in this regard; for example, the above noted discrepancy in the residential density. Also, there is no policy commitment to require current development to be constructed such that future redevelopment at higher densities is possible.

A second concern with the public facilities section is that the water system's current capacity and current useage are not indicated and a projection of future consumption is not made. A comparison of the system's current excess capacity (if any) with the projection of future consumption would give a good indication of the system's ability to accommodate growth. Without such a comparison in the plan, Goal 11 compliance is jeopardized because it is not clear if the water system can accommodate the projected growth.

Thank you for the opportunity to review the plan and implementing ordinances submitted by the City of Aurora.

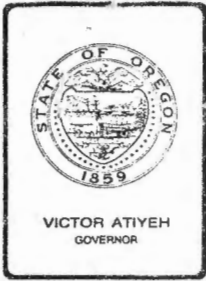
Sincerely,



Jim Jacks
Associate Planning Director

JJ:paw

cc: Mayor Fred Saxton
Pam Brown, County Coordinator
Craig Greenleaf, DLCD



JAN 29 1981

Department of Transportation

TRANSPORTATION BUILDING, SALEM, OREGON 97310

January 29, 1981

SALEM

IN REPLY REFER TO
FILE NO.:
PLA 16-9

Mr. Frank A. Ames, Mayor
City Hall
Aurora, OR 97022

Dear Mayor Ames:

Our Department has reviewed your city's comprehensive plan which has been submitted to the Land Conservation and Development Commission for acknowledgment. Through our plan review procedure we evaluate those portions which relate to our Department's transportation and parks and recreation programs. While your plan addresses many of our concerns well, we must object to acknowledgment because of concerns regarding the treatment of historic sites and structures in Aurora.

The Aurora Comprehensive Plan states that one of the goals of the city is *"To preserve and protect sites and structures of historical significance from demolition or alteration that would affect their historical significance."* There does not, however, appear to be further mention of historic preservation in the plan. Historic sites and structures are not inventoried or identified in the plan and there does not appear to be an implementation measure to assure protection of these resources. Both of these would appear necessary to meet the requirements of LCDC goals.

We are especially concerned because of the city's wealth of historic resources. As you are aware, the Aurora Colony was placed on the National Register in 1974. In order to have the Colony nominated to the Register, a list of 21 primary sites and structures was prepared. This list was most recently sent to the City in November 1979. While it is not complete, it would provide a substantial base for a historic inventory.

Our State Parks Division has some federal survey and planning funds which could be made available to the City of Aurora for developing both an inventory and an implementation mechanism to assure protection of historic sites and structures. These funds must be matched by monies from non-federal sources, either public or private. In addition, our State Parks historic preservation staff would be glad to offer guidance to the city in carrying out these tasks. If you are interested in obtaining funds or other assistance we ask that you contact Elizabeth Potter at 378-5001 in Salem.

Copies to: CG, MR

Mr. Frank A. Ames, Mayor
Page 2
January 29, 1981

In addition to our historic preservation concern, we also have a comment concerning public transportation. When the plan is next revised we ask that you address the needs of transportation disadvantaged persons in your community.

Finally, I would like to express our appreciation for your cooperation regarding our earlier concerns with the Aurora State Airport. In particular, Resolution No. 75 and Ordinance No. 257 fully address our concerns. We look forward to working with you to carry these out.

We would like to be involved in future updates of the plan and ordinances. It will be helpful if you direct information on possible future plan revisions to Chuck Pietrok, our Transportation Planning Representative and Paul Taylor, our Parks Planning Representative. We would also appreciate your sending Chuck notice of any proposed zone changes and subdivision approvals along Highway 99E. Addresses and phone numbers of our representatives are enclosed.

Sincerely,

Robert E. Royer, Assistant Director
Policy and Planning

cc: W. J. Kvarsten/Mitch Rohse
Craig Greenleaf
Pam Brown
Chuck Pietrok
Paul Taylor
Elizabeth Potter

CG

OREGON BUSINESS PLANNING COUNCIL

1178 CHEMEKETA, N.E.

SALEM, OREGON 97301

PHONE (503) 370-8112

STAFF:
KATHERINE KEENE
Planning Director

DEPARTMENT OF LAND
CONSERVATION AND DEVELOPMENT

January 13, 1981

JAN 13 1981
Hand delivered
SALEM 4:30
cu

DAVID S. HILL
Natural Resources
Director

Mr. Wes Kvarsten, Director
Department of Land Conservation
and Development
1175 Court Street N. E.
Salem, OR 97310

Attention: Mitch Rohse

Dear Mr. Kvarsten:

The Oregon Business Planning Council has reviewed the comprehensive plan and implementing ordinances submitted by the City of Aurora in support of its request for acknowledgment of compliance.

Overall, the documents submitted demonstrate that the city has spent a great deal of time and effort in its planning program. The plan seems generally appropriate in content for the city, however, based on our review we have determined that we must object to acknowledgment of compliance based on Statewide Goals 2, 5, 10 and 11. Regretfully, we were not able to participate in the development of the plan.

Our initial concern relates to Goal 2. The zoning ordinance is not internally consistent. In the Two Family Residential Zone, Sections 3:150.3, Lot Size, and 3:150.7, Density Requirements, seem to conflict. Section 3:150.3(1) says, "... the lot area for a two family dwelling shall be not less than 10,000 square feet." We interpret this to mean that the lot area per family can be a minimum size of 5,000 square feet. Section 3:150.7, however, says, "... the lot area per family shall be not less than 7,500 square feet." We believe this internal inconsistency renders that portion of the zoning ordinance ineffective and does not provide adequate implementation of the city's plan.

A second Goal 2 concern regards the "Baker conflicts" that exist between residential plan designations and commercial and industrial zones. We believe these should be rectified prior to acknowledgment.

Another concern regards Goal 5, We could find no mention of mineral and aggregate resources, Goal 5 compliance necessitates an inventory of resources and resolution of identified conflicting uses. If no mineral and aggregate resources exist, the plan should so state.

COPIES TO: MR, CG

Our Goal 10 concerns include several of the factors that comprise Goal 10. We could not find an inventory of existing housing by type. The current housing mix is not clear. Additionally, the Plan Goal that addresses the future housing mix is not clear (p. 14).

"Provide for a balance of low and medium density living areas at a ratio of 75% medium density and 25% high density."

The Goal statement initially refers to low and medium densities, but concludes by referring to medium and high densities.

The plan does not indicate a firm, single figure for the current household size or for the future household size. In 1976 the household size was 2.75 (p. 11), but by 1978 it had, apparently, risen dramatically to 3.1 (p. 15, Table 8). The CAC estimates the future household size will be 3.50 (p. 11), but Table 8 indicates it will be only 2.8.

The plan has not adequately projected the number of dwelling units that will be needed by type, nor has it adequately projected the number of buildable acres needed for each housing type. Furthermore, the plan does not show how many buildable acres have been designated and zoned for each housing type.

It also seems that the plan has not addressed residential densities in a consistent manner. The plan (p. 16) indicates that the low density areas should have a density of up to 6 dwelling units/acre and medium density areas should have up to 24 dwelling units/acre. If we assume that the household size is 2.8 (Table 8), then the densities will be up to 16.8 and 67.2 persons/acre. This does not match the plan's 7.5 and 12.5 persons/acre on page 15.

A major reworking of the housing section is needed prior to Goal 10 compliance. Thus, we cannot support acknowledgment at this time.

Our Goal 11, Public Facilities, objection relates to the lack of goals and policies regarding sewer and water facilities. The Public Facilities Section of the plan contains no goals or policy commitment to pursue new facilities, nor to maintain or improve the existing facilities.

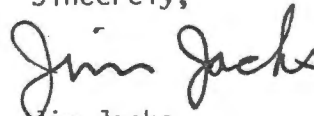
The lack of guidance in the plan relative to a future sewer system is especially significant. Although it is not always entirely clear, the plan, generally, was developed based on the assumption that a sewer system would be in place by the mid-1980s. In this vein the plan tries to

formulate goals and policies and establish land use patterns that recognize the necessity for low density development now, with increasing densities once a sewer system is in place. The plan is not always successful in this regard; for example, the above noted discrepancy in the residential density. Also, there is no policy commitment to require current development to be constructed such that future redevelopment at higher densities is possible.

A second concern with the public facilities section is that the water system's current capacity and current useage are not indicated and a projection of future consumption is not made. A comparison of the system's current excess capacity (if any) with the projection of future consumption would give a good indication of the system's ability to accommodate growth. Without such a comparison in the plan, Goal 11 compliance is jeopardized because it is not clear if the water system can accommodate the projected growth.

Thank you for the opportunity to review the plan and implementing ordinances submitted by the City of Aurora.

Sincerely,



Jim Jacks
Associate Planning Director

JJ:paw

cc: Mayor Fred Saxton
Pam Brown, County Coordinator
Craig Greenleaf, DLCD