

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** Goal 14 prohibits urban uses on rural lands. Where a county’s text amendments to its comprehensive plan do not allow any urban uses on rural land, but merely expand the allowable locations in the county that could be the subject of an application to change the plan designation to rural industrial, and the text amendments require the applicant to demonstrate that the proposed use for which the rural industrial plan designation change is consistent with all statewide planning goals, including Goal 14, a petitioner’s arguments that the amendments violate Goal 14 do not provide a basis for reversal or remand. *Central Oregon Landwatch v. Deschutes County*, 79 Or LUBA 253 (2019).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** A petitioner’s challenge to a county’s amendments to its comprehensive plan that expand the allowable locations in the county that could be the subject of an application to change the plan designation to rural commercial and rural industrial, that argue that the county’s adopted and acknowledged rural commercial and rural industrial zones impermissibly allow urban uses in contravention of Goal 14 are an impermissible collateral attack on an acknowledged land use regulation where no provisions of the county’s code were amended by the challenged decision. *Central Oregon Landwatch v. Deschutes County*, 79 Or LUBA 253 (2019).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** In *Residents of Rosemont v. Metro*, 173 Or App 321, 21 P3d 1108 (2001), the Court of Appeals concluded that under Goal 14 (effective 10/04/00), Metro could identify a subregional (*i.e.*, geographically localized) need for housing, but when considering alternatives to amending the UGB to meet that subregional housing need, Metro could not limit its consideration to lands within the subregion. That broader geographic consideration of alternatives applies both to alternative sites inside the UGB, and to alternative sites outside the UGB subject to the priorities set out in ORS 197.298 and the Goal 14 locational factors, if a UGB amendment is required to meet the identified need. In this way, *Residents of Rosemont* distinguishes between subregional need and subregional analyses of alternatives. *DLCD v. City of Klamath Falls*, 76 Or LUBA 130 (2017).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** In *City of West Linn v. LCDC*, 200 Or App 269, 113 P3d 935, *rev den*, 339 Or 609 (2005), and *Residents of Rosemont v. Metro*, 173 Or App 321, 21 P3d 1108 (2001), the Court of Appeals clarified that pursuant to Goal 14 (effective 10/04/00), Metro can identify a subregional need for housing, and that the Department of Land and Conservation and Development’s rules to that effect were not inconsistent with Goal 14. But the Court of Appeals held that the part of the rules that authorized Metro to limit its consideration of alternatives (both inside the UGB and outside the UGB) for satisfying that subregional housing need to lands within or near the subregion, was inconsistent with Goal 14. *DLCD v. City of Klamath Falls*, 76 Or LUBA 130 (2017).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** In *City of West Linn v. LCDC*, 200 Or App 269, 113 P3d 935, *rev den*, 339 Or 609 (2005), and *Residents of Rosemont v. Metro*, 173 Or App 321, 21 P3d 1108 (2001), the Court of Appeals determined the subregional need which can be identified under Goal 14 (effective 10/04/00), is a subregional need for *housing*, as opposed to a subregional need for a *specified number of acres for development of housing that must be located within that subregion*. Accordingly, Metro may not assume that a subregional need for housing can only be satisfied by constructing housing on land that is physically located within that

subregion. Rather, according to Goal 14, Metro may consider *proximity* in determining whether an alternative site is a suitable alternative, as opposed to simply eliminating alternative sites if they are not located in the subregion. *DLCD v. City of Klamath Falls*, 76 Or LUBA 130 (2017).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** It is one thing to say the alternative sites for meeting an identified short-term subregional need for jobs or shopping opportunities must be located within a specified “proximity” of the shoppers and potential employees that generate the identified need or that alternative sites for meeting that need must be within some stated “proximity” of necessary or supporting improvements. But it is quite another thing to say that the short-term, subregional need for jobs and shopping opportunities can only be satisfied on lands that are located within the subregion. The most obvious flaw in that latter reasoning is that for some of those subregional shoppers and potential employees near the boundaries of the subregion, lands in adjoining subregions will be closer (more proximate) than at least some of the more distant lands inside the subregion. *DLCD v. City of Klamath Falls*, 76 Or LUBA 130 (2017).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** A site suitability characteristic that property must be 22 acres in size to allow development of a “Lifestyle Center” is not appropriate under Goal 14 and OAR 660-024-0060(5), where the city fails to explain why a general subregional need for between 27 and 37.9 acres of land for commercial development must be satisfied by the “Lifestyle Center” proposed by the UGB amendment applicant on a single 22-acre site. *DLCD v. City of Klamath Falls*, 76 Or LUBA 130 (2017).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** OAR 660-004-0040, which provides standards consistent with Goal 14 for certain rural residential development in rural residential zones, does not purport to constitute a complete implementation of Goal 14 with respect to all residential development on rural lands. The rule’s silence regarding some types of residential uses, for example, floating homes, does not allow the inference that such development is either consistent or inconsistent with Goal 14. *Squier v. Multnomah County*, 71 Or LUBA 98 (2015).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** Because OAR 660-004-0040, which provides standards consistent with Goal 14 for certain rural residential development in rural residential zones, does not include standards for floating homes, ORS 197.646(1) does not oblige the county to adopt land use regulation amendments to implement the rule with respect to floating homes. Consequently, that the county’s land use regulations governing floating homes do not include standards based on OAR 660-004-0040 does not mean that the county failed to implement the rule, or that the rule applies directly to land use decisions concerning floating homes, pursuant to ORS 197.646(3). *Squier v. Multnomah County*, 71 Or LUBA 98 (2015).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** The Oregon Supreme Court decision in *1000 Friends of Oregon v. LCDC (Curry Co.)*, 301 Or 447, 724 P2d 268 (1986), did not obligate local governments to apply Goal 14 as interpreted directly to land use decisions made under acknowledged land use regulations, although *amendments* to those regulations must be consistent with Goal 14 as interpreted by *Curry Co.* Where a county’s regulations governing floating homes were adopted and acknowledged to comply with Goal 14 in 1982, and have not been amended since, those regulations remain acknowledged to comply with Goal 14, and thus Goal 14 would

not apply directly to a decision to approve floating homes under that acknowledged ordinance. *Squier v. Multnomah County*, 71 Or LUBA 98 (2015).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** Under Goal 14, OAR 660-024-0030(1) and 660-024-0040(1), urban growth boundary amendments must be consistent with the city’s 20-year population projections, which in turn must be consistent with the county’s population projection for the county and urban areas within the county. For purposes of urban growth boundary amendments, both the county’s and the city’s population projections must be “included in the comprehensive plan or in a document referenced by the plan.” *Hawksworth v. City of Roseburg*, 64 Or LUBA 171 (2011).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** Although it may be likely that an urban growth boundary that was adopted to include a 20-year supply of buildable land no longer has a 20-year supply of buildable land 30 years later, a city must first amend its comprehensive plan to include an updated population projection, before amending its urban growth boundary based on the updated population projections rather than the old population projections in its comprehensive plan. *Hawksworth v. City of Roseburg*, 64 Or LUBA 171 (2011).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** Remand is required where a light rail project that is located partially outside the UGB is approved under a special siting statute that only authorizes light rail projects that are located inside the UGB. *Weber Coastal Bells v. Metro*, 64 Or LUBA 221 (2011).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** Where the OAR 660-008-0005(6) definition of “redevelopable land” specifically encompasses land on which the local government determines there is a “strong likelihood” that the lots will be redeveloped more intensively, a local government does not err in excluding land from its analysis of “redevelopable land” where it concludes that there is not a strong likelihood that redevelopment will occur on any lands within the city due to the arrangement of existing development and market factors. *Friends of Yamhill County v. City of Newberg*, 62 Or LUBA 211 (2010).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** In approving a Goal 14 exception to allow urban development on rural land, OAR 660-014-0040(3)(c) requires the local government to determine whether that urban development will detract from the ability of existing cities and service districts to provide services and whether continued resource management on surrounding lands is assured. While LUBA might be able to overlook a local government’s failure to specifically address OAR 660-014-0040(3)(c) if the exception limited development on the site to the four houses the applicant requested, where it is possible that as many as 14 dwellings might be developed under the exception remand is required. *Columbia Riverkeeper v. Clatsop County*, 61 Or LUBA 240 (2010).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** DLCD’s Goal 14 rule was amended in 2007 to require that the coordinated population projections required by ORS 195.025 and 195.036 must be “developed using commonly accepted practices and standards for population forecasting” and “based on current, reliable and objective sources and verifiable factual information, such as the most recent long-range forecast for the county published by the Oregon Office of Economic

Analysis (OEA). OAR 660-024-0030. A county may not simply rely on county population projections that were found to be valid when they were adopted in 1998 to adopt updated population projections in 2009. While the county is not required to use the OEA long range forecast, it must conduct a review of its 1998 assumptions to determine whether they remain reliable in light of actual population growth and the OEA forecast. *Meyer v. Douglas County*, 61 Or LUBA 412 (2010).

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**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** DLCD’s Goal 14 rule was amended in 2007 to require that the coordinated population projections required by ORS 195.025 and 195.036 must be “developed using commonly accepted practices and standards for population forecasting” and “based on current, reliable and objective sources and verifiable factual information, such as the most recent long-range forecast for the county published by the Oregon Office of Economic Analysis (OEA).” OAR 660-024-0030. A county decision to apply its assumed population growth rate for unincorporated areas of the county to the unincorporated areas of the county located inside urban growth boundaries is not supported by an adequate factual base where there is no explanation for why that assumption is reasonable for urban areas around cities that project a much lower population growth rate. *Meyer v. Douglas County*, 61 Or LUBA 412 (2010).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** Where it is not clear from the record whether a county-adopted 20-year population forecast is the forecast for an urban area or merely for a city within the county, a city is not entitled to rely on the safe harbor provision at ORS 195.034(1) to extend the county’s current forecast to a 20-year period using the same growth trend as assumed by the county in its adopted population forecast. *Sane Orderly Development v. City of Roseburg*, 59 Or LUBA 356 (2009).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** A Metro regional plan provision that requires the Metro Chief Operating Office to conform Metro’s maps to the comprehensive plan mapping that local governments adopt after Metro adds land to the urban growth boundary suggests that local governments have some authority to deviate from Metro’s map designations for the property that is added to the urban growth boundary when they first applies their comprehensive plan map to that property. *Graser-Lindsey v. City of Oregon City*, 59 Or LUBA 388 (2009).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** It is premature to argue that a legislative decision that adopts a new Airport Related zoning district violates a city’s obligation to protect industrial and commercial land from incompatible uses under Statewide Planning Goal 9 and

violates Goals 10 and 14 by impermissibly converting industrially zoned land, for which there is a shortage, to a residential airpark use, which is not needed under Goal 10. Such arguments must await a city decision that actually applies the new Airport Related zoning district to some property in the city. *Port of St. Helens v. City of Scappoose*, 58 Or LUBA 122 (2008).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** Where it is not clear whether a county believes a prior county decision delineated the boundaries of a resort unincorporated community, but petitioners do not allege that the appealed county decision that adopts a large scale map that precisely delineated the resort unincorporated community boundaries violates the OAR 660-022-0020 standards that govern such delineations, petitioners provide no basis for reversal or remand. *Friends of the Metolius v. Jefferson County*, 58 Or LUBA 284 (2009).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** Under the Unincorporated Community Rule, the boundaries of unincorporated communities must be shown on the county’s comprehensive plan map “at a scale sufficient to determine accurately which properties are included.” OAR 660-022-0020(2). Where a comprehensive plan is amended to designate an area as an unincorporated community but that area is not shown on the comprehensive plan at the scale required by OAR 660-022-0020(2), remand is required. *Johnson v. Jefferson County*, 56 Or LUBA 25 (2008).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** Under OAR 660-022-0030(5), hotels and motels in unincorporated communities must be served by a community sewer system. Where the zoning applied to an unincorporated community allows lodges without specifying whether the lodge must be connected to a community sewer system, and the zoning ordinance term “lodges” could overlap with the rule terms “hotels and motels,” an ambiguity and potential inconsistency with the rule is created. But since the zoning ordinance was adopted to implement the unincorporated community rule, any lodge that is also a hotel or motel as the rule uses those terms would have to be connected to a community sewer system. *Johnson v. Jefferson County*, 56 Or LUBA 25 (2008).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** A petitioner who alleges in a LUBA appeal that a rezoning of rural land is defective because it allows conversion of rural land to urban uses without an adequate Goal 14 justification or exception is obligated to develop his or her argument to that effect. Mere speculation that the uses allowed in the new zone are so uncertain or could be approved in a manner in the future that would result in such improper conversion of rural land to urban uses is not sufficient. *Wood v. Crook County*, 55 Or LUBA 165 (2007).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** A county cannot lawfully include resource lands within an urban unincorporated community unless that land remains planned and zoned for resource uses or the county takes an exception to Goals 3 and 4. *Oregon Shores Cons. Coalition v. Coos County*, 50 Or LUBA 444 (2005).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** That a comprehensive plan identifies only a portion rather than the entirety of the geographic extent of a proposed unincorporated community as a “rural community,” “service center,” “rural center,” “resort community” or similar term is not fatal, for purposes of OAR 660-022-0010(10)(b). As long as the proposed community

indeed qualifies as an “unincorporated community” under OAR 660-022-0010(10), the geographic extent of the proposed community is determined under OAR 660-022-0020, which allows certain areas outside the community to be included within the community. *Oregon Shores Cons. Coalition v. Tillamook County*, 48 Or LUBA 423 (2005).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** OAR 660-022-0010(10)(b) embodies a policy choice that the universe of “unincorporated communities” is limited to settlements or communities of some kind that the local government has explicitly recognized in its comprehensive plan prior to October 28, 1994, or that are listed in the Department of Land Conservation and Development (DLCDD) survey. If not listed in the DLCDD survey, the comprehensive plan must describe the proposed community either by one of the terms listed in the rule or a similar term that suggests the county views the area as a community of some kind. *Oregon Shores Cons. Coalition v. Tillamook County*, 48 Or LUBA 423 (2005).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** A description of an industrial park in a comprehensive plan as an “industrial park” is not a “similar term” to “service center,” for purposes of establishing a new unincorporated community under OAR 660-022-0010, where nothing in the comprehensive plan suggests that the county viewed the industrial park as a community of some kind, and in adopting the comprehensive plan the county failed to list or discuss the industrial park in the plan element that addresses unincorporated communities. *Oregon Shores Cons. Coalition v. Tillamook County*, 48 Or LUBA 423 (2005).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** OAR 660-022-0010(8) defines a rural service center in part based on what uses on the property existed or predated October 28, 1994. Where the county fails to establish what current uses of the property existed on or predated October 28, 1994, it cannot determine whether the proposed community qualifies as a rural service center under the rule. *Oregon Shores Cons. Coalition v. Tillamook County*, 48 Or LUBA 423 (2005).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** The requirement in OAR 660-022-0010(8) that a rural service center consist “*primarily* of commercial or industrial uses providing goods and services to the surrounding rural area or persons traveling through the area” means that a *majority* of the subject property must consist of qualifying commercial and industrial uses, and not other uses. *Oregon Shores Cons. Coalition v. Tillamook County*, 48 Or LUBA 423 (2005).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** Rural industrial uses that manufacture products and ship them to urban areas for retail sale do not provide “goods and services to the surrounding rural area or to persons traveling through the area,” for purposes of qualifying a community as a “rural service center” under OAR 660-022-0010(8). *Oregon Shores Cons. Coalition v. Tillamook County*, 48 Or LUBA 423 (2005).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** A county’s approval of a five-acre lot subdivision inside the UGB with a condition requiring that the applicant record CC&Rs that effectively prohibit further subdivision of those five-acre lots violates ORS 197.752. *Nez Perce Tribe v. Wallowa County*, 47 Or LUBA 419 (2004).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** The Court of Appeals has held that the “unneeded but committed” exception, that allows the inclusion of lands within an urban growth boundary (UGB) without demonstrating a “need” for additional land, is a valid method of amending a UGB, without regard to the Goal 14 “need” factors. *Milne v. City of Canby*, 46 Or LUBA 213 (2004).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** Neither Goal 10 nor Goal 14 require a finding of “demonstrated need” for additional residential land within the meaning of Goal 2, Part II or Goal 14, factors 1 and 2 before the city may amend its comprehensive plan map to allow property to be zoned for residential rather than industrial uses. *Holcombe v. City of Florence*, 45 Or LUBA 59 (2003).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** Nothing in either Goal 9 or Goal 14 requires a city to take into account the supply and demand for commercial and industrial lands in portions of the regional UGB outside the city’s planning jurisdiction in deciding whether to rezone industrial lands within the city to allow commercial uses. *Friends of Marion County v. City of Keizer*, 45 Or LUBA 236 (2003).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** A use permitted by statute on EFU land is not subject to the additional requirement that the use be rural or that an exception to Goal 14 be taken, even if the use is urban in nature. Where such a use is expressly permitted on EFU land, it is also implicitly permitted by statute on rural land zoned other than EFU. *Stallkamp v. City of King City*, 43 Or LUBA 333 (2002).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** Because a public park is permitted by statute on EFU land without requiring compliance with Goal 14 or an exception to that goal, it is also permitted on rural land zoned other than EFU without requiring compliance with Goal 14 or an exception, even if the park would primarily serve urban residents. *Stallkamp v. City of King City*, 43 Or LUBA 333 (2002).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** A residential subdivision that includes 136 lots on 680 acres does not undermine the integrity of a UGB, in violation of Goal 14, where the subdivision is located two and one-half miles from the UGB, the lots in the subdivision will not be served by public water or sewer systems and there is evidence that the potential buyers of the proposed lots have different characteristics than potential buyers of lots within the UGB. *DLCD v. Klamath County*, 42 Or LUBA 368 (2002).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** The use of a state highway by commuters from a 136-lot subdivision, and the enrollment of children from that subdivision in city schools, do not impermissibly undermine the effectiveness of a UGB in contravention of Goal 14, where there is evidence that the highway and the school system will not be substantially impacted by the additional trips or by the number of students generated by the subdivision. *DLCD v. Klamath County*, 42 Or LUBA 368 (2002).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** Nothing in Goal 14 expressly requires a county to analyze the potential impact of a proposed rezoning from non-resource to rural

residential on similar property in the area or the cumulative impact of the potential rezonings and development in the area surrounding a UGB. *DLCD v. Klamath County*, 42 Or LUBA 368 (2002).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** The housing needs projection required by the Goal 10 rule is the same housing needs analysis that is required by ORS 197.296(3) for conducting a review of an urban growth boundary. Because the Goal 10 rule requires that the housing needs projection must be “consistent with Goal 14 requirements,” the housing needs analysis under ORS 197.296(3) must be consistent with Goal 14 requirements. *DLCD v. City of McMinnville*, 41 Or LUBA 210 (2001).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** LCDC’s choice to adopt rules that require the housing needs analysis required by ORS 197.296(3) to be “consistent with Goal 14 requirements” is essentially a choice to require that, where the analysis identifies a significant deficit in the supply of buildable land within the UGB, the city must complete the statutory process at ORS 197.296(4) through (7) and adopt one or more of the actions described in the statute to remedy the identified deficit. Because the statute and rule prescribe an iterative process highly integrated with Goal 14, the city cannot achieve finality with respect to the housing needs analysis under ORS 197.296(3) without also taking action under ORS 197.296(4) through (7). *DLCD v. City of McMinnville*, 41 Or LUBA 210 (2001).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** LCDC’s 1985 acknowledgement of a county’s rural residential zone has the legal effect of establishing that the rural residential zoning district *may* be applied consistent with Goal 14 to rural lands outside a UGB. However, the 1985 acknowledgment does not have the legal effect of establishing that *all* future applications of the zoning district to particular properties, no matter what the circumstances, will necessarily comply with Goal 14. *DLCD v. Klamath County*, 40 Or LUBA 221 (2001).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** A finding that Goal 14 is satisfied because the provision of community sewer or water systems would be economically infeasible does not establish that such systems will not be constructed, where it is possible that an application for clustered residential development may make such community services economically feasible and the county did not adopt conditions of approval or other mechanisms to prohibit the establishment of community sewer or water systems. *DLCD v. Klamath County*, 40 Or LUBA 22 (2001).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** Where a local government decision does not incorporate a new city but erroneously applies LCDC’s rules concerning incorporation of new cities in the course of taking an exception to Goal 14, the error is harmless and provides no basis for reversal or remand. *James v. Josephine County*, 35 Or LUBA 493 (1999).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** A proposal to redesignate urban land within city limits to allow for other urban uses does not implicate Goal 14’s requirements regarding conversion of urbanizable land to urban uses. *Citizens for Florence v. City of Florence*, 35 Or LUBA 255 (1998).



**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** Goal 14 does not apply to property within a city’s limits, and therefore a city’s conclusory finding of compliance with Goal 14 is harmless error. *Larvik v. City of La Grande*, 34 Or LUBA 467 (1998).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** The term “public facilities,” as it is used in Goal 14, includes transportation facilities. *Concerned Citizens v. Jackson County*, 33 Or LUBA 70 (1997).

**18.1 Goal 14 – Urbanization/ Goal 14 Rule – Generally.** ORS 197.175(2), Goals 11 and 14 and OAR Chapter 660, Division 11 provide authority for a city and county to adopt a comprehensive plan policy requiring that owners of unincorporated property within an urban growth boundary sign consents to annexation in order to receive sewer service. *Bear Creek Valley San. Auth. v. City of Medford*, 27 Or LUBA 328 (1994).