



**LAKE COUNTY PLANNING COMMISSION
STAFF REPORT**

Agenda Date: 10/17/2023
Item Number: 4

This report is financed in part by an Oregon Department of Land Conservation and Development Planning Assistance Grant.

Lake County Planning Commission Staff Reports are considered part of the record and may be utilized for decision making purposes.

TITLE: (Consolidated Application) CONDITIONAL USE PERMIT (21-050-CUP),
COMPREHENSIVE PLAN CHANGE – GOAL 3 EXCEPTION (21-051-CP)

APPLICANT & AGENT: Webster Road Solar Farm II LLC
3500 S DuPont Highway
Dover, DE 19901
520-261-8094 / permitting@newsunenergy.net

PROPERTY OWNER: Randall & Lynn Christian
PO Box 57
Fort Rock, OR 97735

SUMMARY: Public Hearing concerning an application by Webster Road Solar Farm II LLC to establish a Photovoltaic Solar Project (Utility Facility), which requires a Goal 3 Exception (Comprehensive Plan Change). The Planning Commission will review all project components of the application submitted and give a Recommendation to the County Board of Commissioners (BOC). If later approved by the BOC, the Exception would allow a PV Solar project to be established on a parcel greater than 320 acres, but less than 1920 acres of nonarable land. Commercial Utility Facilities or other facilities for the purpose of generating power for sale are allowed as a conditional use under the Lake County Zoning Ordinance Articles 3 and 24, Oregon Revised Statute (ORS) 215.283, and Oregon Administrative Rule (OAR) 660-033-0130(38). The proposed solar site would be: T25S R14E TL 109, 113, 111 and 112 in the A-2 Agriculture Use Zone. The notice of public hearing has been mailed to all adjacent owners with 750 feet, which includes maps and a list of adjacent owners. Notice is also provided to all affected agencies (local, state, and federal) and a 35-day notice in advance of the hearing to the Department of Land Conservation and Development (DLCD). The application materials are available on the Land Use / Planning page of the county website and in the Planning Office in the Courthouse between normal business hours of 8:30-5:00 M-F and during the hearing. A Staff Report, addressing all of the criteria for the recommendation/decision on the above application will be available 7 days prior to the hearing. If you have any questions contact Darwin Johnson, Planning Director at 541-947-6036 or by email at djohnson@co.lake.or.us.

REPORT BY: Darwin Johnson Jr., Planning Director – 10 October 2023

LEGAL NOTICES: By publication, Lake County Examiner – October 4, 2023. Individual notice to all adjacent owners and agencies – 26 September 2023 (see Attachment B, C, & D).

The following notice language was used along with the above summary:

NOTICE IS HEREBY given that the Lake County Planning Commission will hold a public hearing Tuesday, October 17, 2023, at 6:00pm, at the Fort Rock Grange Hall at 64651 Fort Rock Rd, Fort Rock, Oregon 97735, or by Zoom (<https://zoom.us/j/91484568866>) to receive public comment and testimony on the following application. Failure to raise an issue at the hearing or to provide sufficient specificity precludes your ability to appeal the decision to the Board of Commissioners. If you have needs requiring special arrangements, please call 541-947-6036 at least 24 hours prior to the meeting.

GENERAL SITE INFORMATION:

Type	Detail	Notes:
Assessor's Account	18703, 19672, 19673, & 19807	
Legal Description	T25S R14E S25 TL109, 113, 111 and 112	
Zone Designation	A-2, Agriculture Use	
Comprehensive Plan Designation	A – Agriculture	
Parcel Size	636.3 acres	
Current Land Use	Dwelling, and an Approved 320-acre PV Solar Site, see File 19-058-CUP.	The applicant has submitted site photos with the application.
Proposed Land Use	Photovoltaic (PV) Solar Project – Utility Facility, a Goal 3 Exception – Comprehensive Plan Change, also including Transmission Line to the, (also being requested) Substation.	A Zone/Comprehensive Plan Change Application has been applied for and will be considered by the Planning Commission at the October 2023 regularly scheduled meeting. The Planning Commission will make a Recommendation to the Board of County Commissioners on this combined application.
Special Assessment Taxation	No	<i>Classes 401, 400 and 400 – Tract property – is parcels of varying sizes of improved acreage where the highest and best use is for development to a suburban or rural homesite, but the land is not divided into urban-type lots. (from the Basic Property Classes – Assessor's Office Worksheet)</i>
Fire Protection	No; however, applicant states:	Christmas Valley Rural Fire Protection District
Water Rights	No	No Irrigation Rights on the subject properties

ADJOINING PROPERTY INFORMATION:

Type	Detail	Notes:
Zone Designation	A-2, Agriculture Use	
Plan Designation	R – Range	
Existing Land Uses	Primarily Vacant (BLM); however, Pivots to the North. Vacant (Private) to the South.	See also Attachments B & C

INFRASTRUCTURE AVAILABILITY:

Type	Detail	Notes:
Electrical Service	Provided by	Midstate Electric

Potable Water	N/A	Applicant will deliver any required water from off-site via truck or from a water well on the property (in accordance with ORS 537.545(1)(f)), or a combination of both.
Public Sewer or Septic	Currently Provided by	Septic; however, no toilet or bathrooms are included as part of the proposed project.
Access to Public Roadway	Webster Road (Co. Rd. 5-11C)	Refer to Condition of Approval 3. Any required easements will be obtained prior to construction.
Garbage Collection/Disposal	N/A	All waste generated during construction will be removed by the applicant. Garbage collection service will not be required.

ENVIRONMENTAL ISSUES:

Type	Detail	Notes:
Wildlife Habitat	Not in Goal 5 Overlay	However, currently mapped General Sage Grouse Habitat, and Biological Big Game Winter Range
Soil Classifications	Class 6 per USDA	See Attachment A: Exhibit B
Flood Plain	Zone D – Undetermined Panel: 410115 0400B	FEMA Flood Insurance Rate Map (FIRM) Map Index states, “Panel Not Printed”
Wetlands	No	See Attachment A: Exhibit D

GENERAL OVERVIEW OF THIS LAND USE PROCESS:

Cities and Counties in Oregon possess certain land use documents that guide and regulate development which are in Lake County:

The Comprehensive Plan.

The Comprehensive Plan is a land use document containing text, photographs, inventories and maps designed to identify the history, current conditions and the future aspirations of the County.

The Zone Ordinance and/or Land Development Ordinance.

The Zone Ordinance and Land Development Ordinance are specific regulatory documents that identify what types of land use activities can occur on properties and how the development is to be constructed. The Zone Ordinance and Land Development Ordinance are text documents that correspond to a Zone Map. A Zone Map is associated with the Zone Ordinance and the Zone Map shows property ownership boundaries overlaid by a specific Zone(s) and Comprehensive Plan designation.

What is an “Exception” and how does this relate to the County land use regulations?

The Comprehensive Plan, Zone Ordinance and Land Development Ordinance were acknowledged by the State of Oregon’s Department of Land Conservation and Development (DLCD) when Lake County initially created the regulations in the early 1980’s.

There are situations where certain development or land use activities are not well described in the acknowledged regulations (particularly with regard to large scale developments) and this is not unique to Lake County. When this happens, DLCD establishes special rules to ensure that development maintains the expectations of the Statewide Planning Goals.

An “Exception” is a process that allows an applicant to present justifying circumstances or reasons allowing the specific goals and rules to not apply.

The “Exception” process is not taken lightly by Lake County or DLCD as both entities are bound by the Statewide Planning Goals.

What is the Planning Commission’s task on this application?

The Lake County Planning Commission (PC) is tasked with making a recommendation to approve or deny the proposed Goal 3 Exception to the Lake County Board of County Commissioners (BOC) based upon the application materials, submittals from agencies, professionals and testimony from the public.

The BOC will take the recommendations of the PC into account at a separate meeting, which will further evaluate the application materials, submittals and testimony from the public. There is a possibility that the BOC might Remand part or all of the application back to the PC for further consideration and recommendation.

FINDINGS OF FACT AND CONCLUSIONS OF LAW:

Lake County Zone Ordinance Section 29.04 identifies the source of findings as:

- A. Comprehensive Plan, Supplemental Atlas, and other ordinances and plan supplements.*
- B. Information presented at hearings or other public discussions of related issues.*
- C. Findings presented by the applicants.*
- D. Various sources of physical, social, legal, economic, environmental or other applicable information.*

Finding: The following findings are a compilation of the Lake County Comprehensive Plan (LCCP), Lake County Zoning Ordinance (LCZO) and other supplemental materials, including Oregon Revised Statute (ORS) and Oregon Administrative Rule (OAR). The applicant has included supplemental information in the Conditional Use Permit, Comprehensive Plan Change, and Variance Applications (see Attachment A). The LCCP and Implementing Ordinances were acknowledged by the Land Conservation and Development Commission (LCDC) on July 8, 1982 as satisfactorily meeting each of the State’s Land Use goals as applicable. The subject property for the proposed Solar facility is zoned A-2, Agriculture Use with a Comprehensive Plan Designation of A, Agriculture on July 8, 1982. The proposed substation is on A-2 Agriculture Use with a Designation of A – Agriculture, as well as the associated transmission line. Commercial Utility Facilities or associated facilities for the purpose of generating power for sale are allowed as conditional uses under the Lake County Zoning Ordinance, Articles 3 and 24, Oregon Revised Statute (ORS) 215.283, and Oregon Administrative Rule (OAR) 660-033-0130(5) and (38), and associated references within ORS and OAR including recent updates to those laws from the passing of bills such as HB 2329. A decision will be based on the application meeting the applicable criteria as found for in the Application Narrative and additions and deletions to the findings for all applicable criteria contained herein, after all hearings, and discussions between the PC for recommendation and review and decision by the BOC.

This Staff Report, prepared for the October 17, 2023 hearing gives no staff recommended findings, but referred the Planning Commission to the Applicants Application materials submitted, specifically Exhibit F – Supplemental Burden of Proof Statement as Revised October 9, 2023, which is a complete response to all applicable criteria. The criteria and applicant responses to Lake County Comprehensive Plan and Zoning Ordinance criteria is found therein and is recommended for adoption as meeting the criteria as outlined within that document, as amended by the PC during the hearing or subsequent hearing(s).

Future revisions of the Staff Report and the Recommendation will include by reference to the findings for each pertinent criterion that must be met. Proposed Conditions of Approval will also be included in the Recommendation to the BOC. It is anticipated that the final Wildlife Mitigation Plan be agreed upon by ODFW and the Applicant followed by approval of the BOC prior to the BOC making their final decision in the consolidated applications listed above.

OREGON REVISED STATUTES

ORS 197.732 Goals exceptions; criteria; rules; review

ORS 215.446 Renewable Energy Facility; Application; Standards; Notices

ORS 215.283 Uses Permitted in Exclusive Farm Use Zones in Nonmarginal Lands’ Counties; Rules

ORS 215.274 Associated Transmission Lines Necessary for Public Service; Criteria; Mitigating Impact of Facility

Finding: The PC recommends adoption of the response made by the applicant, in Attachment A: Exhibit F, Supplemental Burden of Proof Statement as Revised October 9, 2023, as meeting the criteria for all of the above. The proposed exception is applicable only to the subject site and this exception would not establish a general planning or zoning policy. The exception would allow for the use to be established followed by retirement after the life of the project is completed. This criterion is met and findings for each of the applicable statewide planning goals will be included by reference in the final document.

OREGON ADMINISTRATIVE RULES

OAR 660-004-0015 Inclusion as Part of the Plan

- (1) A local government approving a proposed exception shall adopt, as part of its comprehensive plan, findings of fact and a statement of reasons that demonstrate that the standards for an exception have been met. The reasons and facts shall be supported by substantial evidence that the standard has been met.*
- (2) A local government denying a proposed exception shall adopt findings of fact and a statement of reasons that demonstrate that the standards for an exception have not been met. However, the findings need not be incorporated into the local comprehensive plan.*

Finding: The PC finds that this document, along with any findings made by the BOC, serve to meet the requirement for findings of fact. If the exception is approved the county will have shown *reasons and facts... supported by substantial evidence that the standards have been met.* The record of approval will remain on file with the county.

OAR 660-004-0130 Minimal Standards Applicable to the Schedule of Permitted and Conditional Uses

Finding: The PC recommends adoption of the response made by the applicant, in Attachment A: Exhibit F, Supplemental Burden of Proof Statement as Revised October 9, 2023, as meeting the criteria for all of the above. The proposed exception is applicable only to the subject site and this exception would not establish a general planning or zoning policy. The exception would allow for the use to be established followed by retirement after the life of the project is completed. This criterion is met and findings for each of the applicable statewide planning goals will be included by reference in the final document.

OAR 660-004-0020 Goal 2, Part II(c), Exception Requirements

Finding: The PC recommends adoption of the response made by the applicant, in Attachment A: Exhibit F, Supplemental Burden of Proof Statement as Revised October 9, 2023, as meeting the criteria for all of the above. The proposed exception is applicable only to the subject site and this exception would not establish a general planning or zoning policy. The exception would allow for the use to be established followed by retirement after the life of the project is completed. This criterion is met and findings for each of the applicable statewide planning goals will be included by reference in the final document.

OAR 660-015-0000 Statewide Planning Goals and Guidelines

- Goal 1: Citizen Involvement*
- Goal 2: Land Use Planning*
- Goal 3: Agricultural lands*
- Goal 4: Forest Lands*
- Goal 5: Natural Resources, Scenic and Historic Areas, and Open Spaces*
- Goal 6: Air, Water and Land Resources Quality*
- Goal 7: Areas Subject to Natural Hazards*
- Goal 8: Recreational Needs*
- Goal 9: Economic Development*
- Goal 10: Housing*
- Goal 11: Public Facilities and Services*
- Goal 12: Transportation*

Goal 13: Energy Conservation
Goal 14: Urbanization

Finding: The PC recommends adoption of findings made by the applicant, Attachment A: Exhibit F, Supplemental Burden of Proof Statement as Revised October 9, 2023, in that the Statewide Planning Goals 1-14, if or as applicable have been met.

Goal 15: Willamette River Greenway
Goal 16: Estuarine Resources
Goal 17: Coastal Shorelands
Goal 18: Beaches and Dunes
Goal 19: Ocean Resources

Finding: The PC finds that Statewide Planning Goals 15-19 are not applicable to the subject area or Lake County as a whole. No further findings are necessary for these goals.

CONDITIONS OF APPROVAL:

Finding: The PC recommends the following Conditions of Approval as agreed upon by the PC and Applicant during the hearing:

Note: Conditions of Approval to be added at hearing by PC following discussion.

PLANNING COMMISSION RECOMMENDATION:

Following a review of all relevant information, the Planning Commission recommends _____ of the Conditional Use Permit and Comprehensive Plan Change – Goal 3 Exception based upon the enclosed Findings of Fact, Attachments*, Exhibits* and testimony submitted at the hearing(s) and conclusions of law. This Recommendation is now forwarded to the Board of County Commissioners for their review and final decision.

PLANNING COMMISSION VOTE RESULT:

PLANNING COMMISSIONER	POSITION & TERM	MOTION	YES	NO	ABSTAIN
Karen Morgan (<i>Vice-Chair</i>)	1 N. Lake – 12/31/2026				
Nora Taylor Perry	2 S. Lake – 12/31/2026				
Jim Walls	3 S. Lake – 12/31/2023				
Joe Villagrana	4 C. Lake – 12/31/2023				
Terry Crawford	5 N. Lake – 12/31/2024				
Wes Davies (<i>Chair</i>)	6 S. Lake – 12/31/2024				
Stuart Burgess	7 C. Lake – 12/31/2025				

SIGNATURE:

Upon the vote of quorum at the Planning Commission, the Conditional Use Permit and Comprehensive Plan Change – Goal 3 Exception are hereby recommended for _____ this ____ day of _____, 2023 based upon the Findings of Fact, Attachments*, Exhibits* and testimony submitted at the hearing(s) and conclusions of law associated with this land use application.

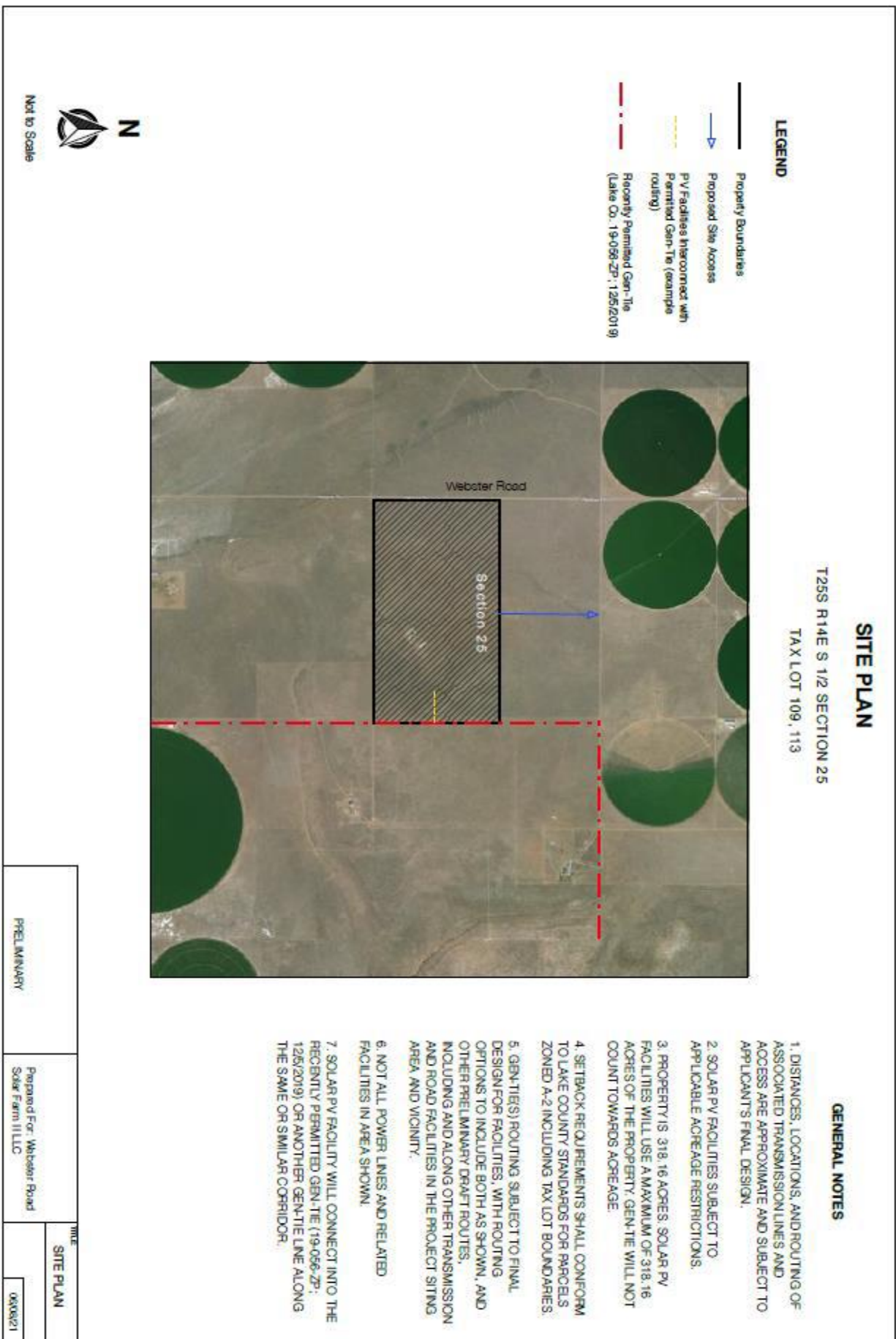
Wes Davies
Planning Commission Chair

APPEAL PROCEDURE:




Any party aggrieved by the decision of the Lake County Board of Commissioners may exercise the right to appeal if they provided input or evidence into the record concerning this land use application, and if filed within 21 days from the mailing of the Notice of Decision, with the State Land Use Board of Appeals (LUBA). Contact LUBA for more details.

APPLICATION, ATTACHMENTS & EXHIBITS *Complete File in the Record:

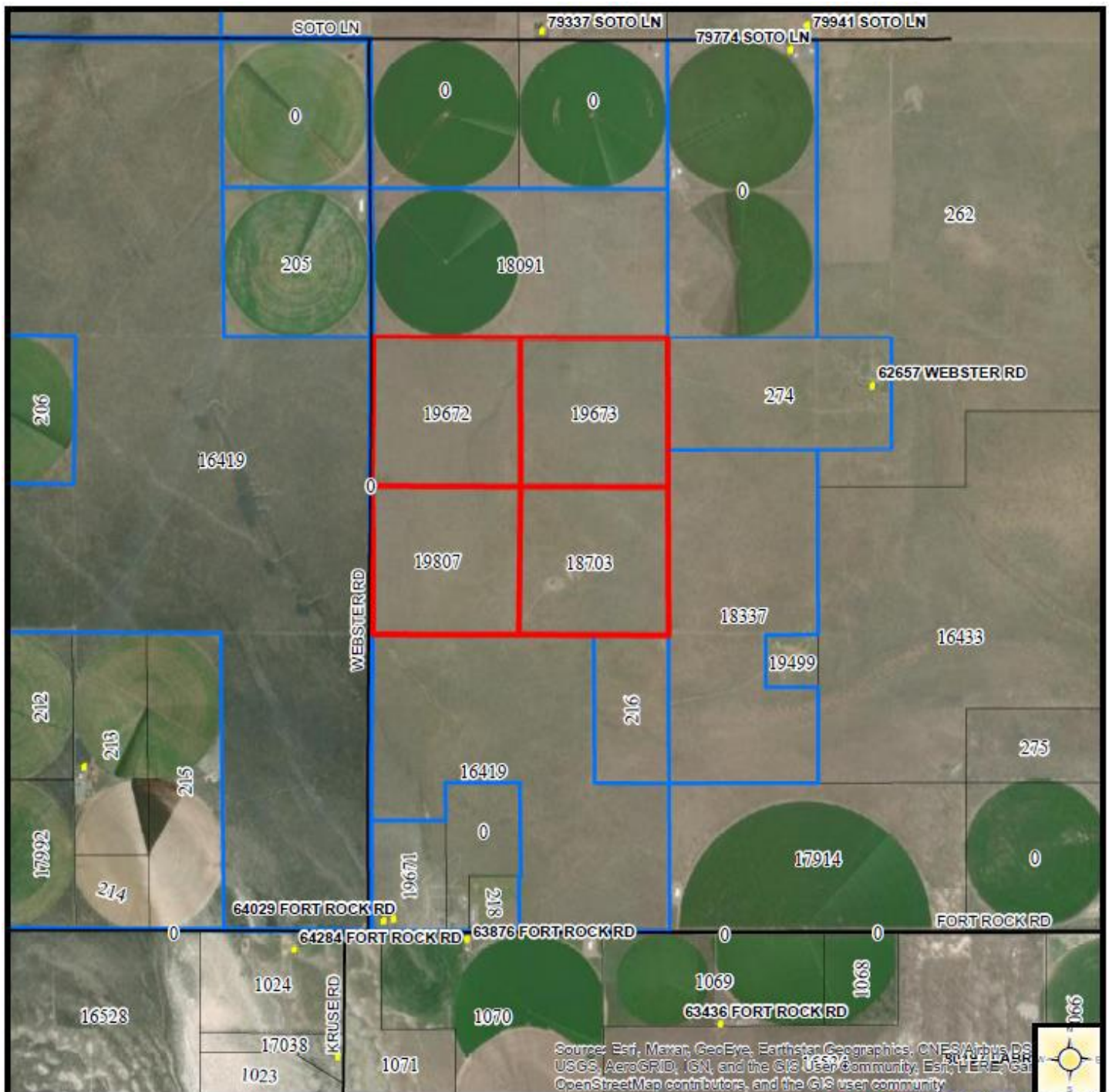
- * Att. A: Consolidated Application: Conditional Use Permit and Comprehensive Plan Change Applications
(see Website for link to application. PC were printed copies mailed the week of October 9, 2023) (See application for table of Contents page i.) – Deemed complete Sept. 24, 2021.
- Att. B: Adjacent Owners & Agencies Notified List – Staff prepared list
- Att. C: Adjacent Owners Map – Staff prepared map showing those w/i 750’
- * Att. D: Notice to Adjacent Owners & Agencies – sent 09/26/2023
- * Att. E: Notice to DLCD of Proposed Amendment with Attachments (Form 1, Proposed Amendment, etc.)



Attachment B: Adjacent Owners & Agencies Notified List – Staff prepared list

21-050-CUP, 21-051-CP (Webster Road Solar Farm II LLC) - Adjacent Owners within 750'										
APPLICANT - POI / AGENT INFORMATION	ADDRESS	CITY	ST	ZIP	ACCT	MAP NUMBER	TAXLOT	ACRES	CLASS	SITUS
Webster Road Solar Farm II LLC	3500 S DuPont Highway / permitting@newsunenergy.net	Dover	DE	19901	18703, 19672, 19673, 19807	25S14E	109, 113, 111, 112	636.3	401, 400, 400, 400	62129 Webster Road
CURRENT LAND OWNER	ADDRESS	CITY	ST	ZIP	ACCT	MAP NUMBER	TAXLOT	ACRES	CLASS	SITUS
Randall & Lynn Christian	PO Box 57	Fort Rock	OR	97735	18703, 19672, 19673, 19807	25S14E	109, 113, 111, 112	636.3	401, 400, 400, 400	62129 Webster Road
ADJACENT PROPERTY OWNER to PROPERTY OF INTEREST (SOLAR SITE)	ADDRESS	CITY	ST	ZIP	ACCT	MAP NUMBER	TAXLOT	ACRES	CLASS	SITUS
-	-	-	-	-	0	25S14E	ROADS	0	0	-
KENNETH & LESLIE HUFFORD REV LIV TRUST	PO BOX 99	FORT ROCK	OR	97735	205	25S14E	1400	158.18	551	UNDETERMINED
KITTREDGE PROPERTIES LLC	PO BOX 149	FORT ROCK	OR	97735	216	25S14E	2800	80	550	UNDETERMINED
KENNETH & LESLIE HUFFORD REV LIV TRUST	PO BOX 99	FORT ROCK	OR	97735	265	25S15E	600	323.02	551	79774 Soto Lane
TUTTLE CHARLES & JOYCE	62657 WEBSTER ROAD	FORT ROCK	OR	97735	274	25S15E	1500	181.06	559	62657 WEBSTER RD
U S A	700 W MINERAL AVENUE	LITTLETON	CO	80120	16419	25S14E	100	13062.1	970	UNDETERMINED
KENNETH & LESLIE HUFFORD REV LIV TRUST	PO BOX 99	FORT ROCK	OR	97735	18091	25S14E	108	318.2	400	62129 WEBSTER RD
KITTREDGE PROPERTIES LLC	PO BOX 149	FORT ROCK	OR	97735	18337	25S15E	201	343.06	550	UNDETERMINED
CHRISTIAN RANDALL L & LYNN L	PO BOX 57	FORT ROCK	OR	97735	18703	25S14E	109	160	401	62129 WEBSTER RD
CHRISTIAN RANDALL L & LYNN L	PO BOX 57	FORT ROCK	OR	97735	19672	25S14E	111	158.16	400	UNDETERMINED
CHRISTIAN RANDALL L & LYNN L	PO BOX 57	FORT ROCK	OR	97735	19673	25S14E	112	160	400	UNDETERMINED
CHRISTIAN RANDALL L & LYNN L	PO BOX 57	FORT ROCK	OR	97735	19807	25S14E	113	158.16	400	UNDETERMINED
Also Notified: AGENCY	ADDRESS	CITY	ST	ZIP	LOGO		AFFIDAVIT OF MAILING			
Lake County Building Department	jstephens@co.lake.or.us // lcooper@co.lake.or.us	Lakeview	OR	97630			I, Darwin Johnson, being first sworn, depose and say that I am an employee of the Lake County Planning Office, and that on (no later than) the 26th day of September, 2023, I did deposit in the U.S. Postal System said ADJACENT PROPERTY OWNER NOTICE, a copy of said being attached hereto, in a sealed envelope addressed to those individuals on the mailing list attached hereto.			
Lake County Road Department	P O Box 908 // lakecoroad@co.lake.or.us // khock@co.lake.or.us	Lakeview	OR	97630						
Lake County Assessor's Office	513 Center Street // dknowles@co.lake.or.us	Lakeview	OR	97630						
Lake County Sheriff's Office	513 Center Street // mtaylor@co.lake.or.us	Lakeview	OR	97630						
Oregon Department of Environmental Quality (DEQ)	513 Center Street // wgfanam@gmail.com	Lakeview	OR	97630			 Darwin Johnson, Jr.			
Oregon Water Resources Dept.	brian.m.mayer@state.or.us	Lakeview	OR	97630						
U S A - BLM	1301 S G St // ksteward@blm.gov	Lakeview	OR	97630						
Oregon Department of Transportation (ODOT)	ODOTR4PLANMGR@odot.state.or.us	Bend	OR	97701						
Oregon Department of Fish and Wildlife	P O Box 1214 // jonathan.d.muir@state.or.us	Lakeview	OR	97630						
Oregon Department of Fish and Wildlife	31374 Parrell Road // andrew.j.walch@state.or.us	Bend	OR	97702						
Oregon Department of Forestry	dustin.gustavson@state.or.us	Lakeview	OR	97630						
Outback News	outbacknews@gmail.com	Silver Lake	OR	97638						
Desert Whispers	P O Box 181	Christmas Valley	OR	97641						
Community Breeze	tennyouitsway@aol.com	Christmas Valley	OR	97641						
Soil & Water Conservation District	LakeviewSWCD2@hotmail.com / lakecountyswcd@hotmail.com	Lakeview	OR	97630						
State Fire Marshal's Office, Jeremy Wadkins	2525 Biehn Street // jeremy.wadkins@osp.oregon.gov	Klamath Falls	OR	97601						
Oregon Department of Energy (ODOE) Attn: Todd Cornett	Todd.Cornett@oregon.gov	Salem	OR	-						
The Klamath Tribes	perry.chocktoot@klamathtribes.com	Chiloquin	OR	97624						
State Historical Preservation Office (SHPO) Attn: John Pouley	john.pouley@oregon.gov	SALEM	OR	-						
Oregon Department of Aviation (ODA) Attn: Betty Stansbury	betty.stansbury@aviation.state.or.us	SALEM	OR	-						
Oregon Department of Conservation and Development (DLCD)	Jon.JININGS@dled.oregon.gov // Scott.EDELMAN@dled.oregon.gov	Bend	OR	-						
Oregon Department of Fish and Wildlife	Sarah.J.Reif@state.or.us	SALEM	OR	-						
Lake County Cooperative Weed Management Area	Jason Jaeger - lakecountyweeds@gmail.com	Lakeview	OR	97630						
United States Department of Defense - Attn: Kimberly Peacher	kimberly.peacher@navy.mil	-	-	-						
Fort Rock RFPD		Fort Rock	OR	97735						

Attachment C: Adjacent Owners Map – Staff prepared map showing those w/i 750'



Adjacent Owner's Map (properties within 750 feet) File #21-050-CUP, -051-CP (Webster Road Solar)

- Property of Interest (POI)
- Adjacent Owners within 750 Feet of POI
- Big Game Winter Range
- Sage Grouse - Core Area
- Sage Grouse - Low Density
- Sage Grouse - General
- Taxlot Aug 2021 Owners

Lake County Planning Department
541-647-8038
www.lakecountyor.org
email: djohnson@co.lake.or.us



Prepared by: Darin Johnson, Planning Director
Date: 26 October 2021

All adjacent property owners receive notice. The adjacent property owners are outlined in blue, with the subject property in red. There is an adjacent property owner list that provides greater details of the land owners, zoning, and acre. The Planning Department uses the Assessor's Database for the source of these names and addresses, thus the best available data is used.

No warranty is made by Lake County or the Bureau of Land Management as to the accuracy, reliability or completeness of this data for individual or aggregate use with other data. Other data was compiled from various sources. This information may not meet National Map Accuracy Standards. This product was developed through digital means and may be updated without notification. GIS data used by Lake County is not survey grade. Coordinates and spatial locations of parcel data should be used for reference purposes only. Coordinates have an error factor of a minimum of +/- 50 feet. Subsequently there are many error factors that contribute to the inaccuracy. Lake County GIS uses the best available data. Over time the accuracy levels will be improved.

