



City Council Agenda

Mayor
Christine Lundberg

City Council
Sean VanGordon, Ward 1
Hillary Wylie, Ward 2
Sheri Moore, Ward 3
Dave Ralston, Ward 4
Marilee Woodrow, Ward 5
Joe Pishioneri, Ward 6

City Manager:
Gino Grimaldi
City Recorder:
Amy Sowa 541.726.3700

City Hall
225 Fifth Street
Springfield, Oregon 97477
541.726.3700
Online at www.springfield-or.gov

The meeting location is wheelchair-accessible. For the hearing-impaired, an interpreter can be provided with 48 hours' notice prior to the meeting. For meetings in the Council Meeting Room, a "Personal PA Receiver" for the hearing impaired is available, as well as an Induction Loop for the benefit of hearing aid users.

To arrange for these services, call 541.726.3700.

Meetings will end prior to 10:00 p.m. unless extended by a vote of the Council.

All proceedings before the City Council are recorded.

September 12, 2016

6:00 p.m. Dinner for Elected Officials and Staff
Library Meeting Room

6:30 p.m. Joint Work Session
Springfield City Council
Lane County Board of Commissioners
Lane County Planning Commission
Library Meeting Room

*(Council work sessions are reserved for discussion between Council, staff and consultants;
therefore, Council will not receive public input during work sessions.
Opportunities for public input are given during all regular Council meetings)*

CALL TO ORDER

ROLL CALL

City of Springfield: Mayor Lundberg ____, Councilors VanGordon ____, Wylie ____, Moore ____, Ralston ____, Woodrow ____, and Pishioneri ____.

Lane County Board of Commissioners: Board Chair Stewart ____, Commissioners Leiken ____, Bozievich ____, Farr ____, and Sorenson ____.

Lane County Planning Commission: Chair Charles Conrad ____, Commissioners Hledik ____, Sisson ____, Coon ____, Thorp ____, Rose ____, Thiesfeld ____, and Kaylor.

1. Springfield 2030 Comprehensive Plan: Adoption of Amendments to the Springfield Urban Growth Boundary (UGB) and *Eugene-Springfield Metropolitan Area General Plan*, Designating Land to Meet Employment Land Needs for 2010-2030 Planning Period and Designating Land for Natural Resources; Public Facilities; Parks and Open Space. (Metro Plan Amendment File No. LRP 2009-00014).
[Linda Pauly] (30 Minutes)

ADJOURNMENT

7:00 p.m. Joint Public Hearing Session
Springfield City Council
Lane County Board of Commissioners
Lane County Planning Commission
Library Meeting Room

CALL TO ORDER

ROLL CALL - Mayor Lundberg ____, Councilors VanGordon ____, Wylie ____, Moore ____, Ralston ____,
City of Springfield: Mayor Lundberg ____, Councilors VanGordon ____, Wylie ____, Moore ____, Ralston ____,
Woodrow ____, and Pishioneri ____.

Lane County Board of Commissioners: Board Chair Stewart ____, Commissioners Leiken ____, Bozievich ____, Farr ____, and Sorenson ____.

Lane County Planning Commission: Chair Charles Conrad ____, Commissioners Hledik ____, Sisson ____, Coon ____, Thorp ____, Rose ____, Thiesfeld ____, and Kaylor.

PUBLIC HEARING

2. Springfield 2030 Comprehensive Plan: Adoption of Amendments to the Springfield Urban Growth Boundary (UGB) and *Eugene-Springfield Metropolitan Area General Plan*, Designating Land to Meet Employment Land Needs for 2010-2030 Planning Period and Designating Land for Natural Resources; Public Facilities; Parks and Open Space. (Metro Plan Amendment File No. LRP 2009-00014).
[Linda Pauly] (60 Minutes)

ORDINANCE NO. 1 – AN ORDINANCE AMENDING THE SPRINGFIELD URBAN GROWTH BOUNDARY; THE EUGENE-SPRINGFIELD METROPOLITAN AREA GENERAL PLAN (METRO PLAN) TEXT AND DIAGRAM TO AMEND THE METRO PLAN BOUNDARY, ADOPT THE SPRINGFIELD 2030 COMPREHENSIVE PLAN (2030 PLAN) ECONOMIC AND URBANIZATION POLICY ELEMENTS AND ASSIGN PLAN DESIGNATIONS TO NEWLY URBANIZABLE LANDS; THE SPRINGFIELD ZONING MAP TO ASSIGN NEW ZONING; THE SPRINGFIELD DEVELOPMENT CODE TO ADD SECTIONS 3.2-915 – 3.2-930 ESTABLISHING THE AGRICULTURE-URBAN HOLDING AREA LAND USE ZONING DISTRICT (AG); AND ADOPTING A SEVERABILITY CLAUSE.

NO ACTION REQUESTED. FIRST READING ONLY.

ADJOURNMENT

AGENDA ITEM SUMMARY

Meeting Date: 9/12/2016
Meeting Type: Work Session/Reg. Mtg
Staff Contact/Dept.: Linda Pauly DPW
Staff Phone No: (541)726-4608
Estimated Time: 90 minutes
Council Goals: Mandate

**SPRINGFIELD CITY COUNCIL AND LANE
COUNTY BOARD OF COMMISSIONERS**

ITEM TITLE: SPRINGFIELD 2030 COMPREHENSIVE PLAN: ADOPTION OF AMENDMENTS TO THE SPRINGFIELD URBAN GROWTH BOUNDARY (UGB) AND *EUGENE-SPRINGFIELD METROPOLITAN AREA GENERAL PLAN*, DESIGNATING LAND TO MEET EMPLOYMENT LAND NEEDS FOR 2010-2030 PLANNING PERIOD AND DESIGNATING LAND FOR NATURAL RESOURCES; PUBLIC FACILITIES; PARKS AND OPEN SPACE. (METRO PLAN AMENDMENT FILE NO. LRP 2009-00014)

ACTION REQUESTED: Conduct a joint public hearing with the Lane County Board of Commissioners and first reading of the following Ordinance: **AN ORDINANCE AMENDING THE SPRINGFIELD URBAN GROWTH BOUNDARY; THE *EUGENE-SPRINGFIELD METROPOLITAN AREA GENERAL PLAN (METRO PLAN)* TEXT AND DIAGRAM TO AMEND THE *METRO PLAN* BOUNDARY, ADOPT THE SPRINGFIELD 2030 COMPREHENSIVE PLAN (2030 PLAN) ECONOMIC AND URBANIZATION POLICY ELEMENTS AND ASSIGN PLAN DESIGNATIONS TO NEWLY URBANIZABLE LANDS; THE SPRINGFIELD ZONING MAP TO ASSIGN NEW ZONING; THE SPRINGFIELD DEVELOPMENT CODE TO ADD SECTIONS 3.2-915 – 3.2-930 ESTABLISHING THE AGRICULTURE-URBAN HOLDING AREA LAND USE ZONING DISTRICT (AG); AND ADOPTING A SEVERABILITY CLAUSE.** A joint work session with Lane County will be conducted prior to the hearing. Staff will present an overview of the proposed amendments at the work session.

ISSUE STATEMENT: Springfield has completed its evaluation of land needed to provide adequate employment opportunities for the 2010-2030 planning period consistent with Oregon Statewide Planning Goal 9: Economic Development; has prepared Economic and Urbanization comprehensive plan land use policies and land use regulations to support attainment of community economic development objectives; and has evaluated lands to be included in an expansion of the UGB to address land needs that cannot be met within the existing UGB consistent with ORS 197.298 and Oregon Statewide Planning Goal 14: Urbanization.

ATTACHMENTS:

1. Council Briefing Memo and attachments
2. Ordinance and Exhibits:
 - Exhibit A: UGB, Metro Plan Diagram and Springfield Zoning Map amendments
 - Exhibit B: Economic Element and Technical Supplement CIBL/EOA Final Report
 - Exhibit C: Urbanization Element and Technical Supplement
 - Exhibit D: Metro Plan text amendments
 - Exhibit E: Springfield Development Code amendment: AG Zoning District
 - Exhibit F: Staff Report and Draft Findings
3. Testimony Received: Kloos/Johnson Crushers International

**DISCUSSION/
FINANCIAL
IMPACT:** Adoption of Springfield’s Commercial and Industrial Lands Buildable Lands Inventory and Economic Opportunities Analysis (CIBL/EOA) is critical to Springfield’s ability to plan, zone and develop land within the community consistent with the community’s livability and economic prosperity goals and redevelopment priorities. The CIBL/EOA Final Report provides empirical data to establish the amount and type of employment sites needed to accommodate forecasted employment growth and target employers. Springfield’s need for employment sites larger than 5 acres cannot be met within the existing UGB. The proposed UGB amendment adds approximately 257 acres of suitable employment land in two areas — North Gateway and Mill Race — to add suitable sites to meet the identified need for 223 acres of sites larger than 5 acres. Springfield’s final UGB may include some or all land described in the Ordinance or other lands identified through the 2030 Plan amendment public process, consistent with the prioritization requirements of ORS 197.298 and the Oregon Land Use Goal 14 Administrative Rule.

MEMORANDUM

City of Springfield

Date: 9/12/2016
To: Gino Grimaldi **COUNCIL**
From: Anette Spickard, DPW Director **BRIEFING**
Linda Pauly, DPW Principal Planner
Subject: Springfield 2030 Plan and Urban Growth **MEMORANDUM**
Boundary (UGB) Amendments
File No. LRP 2009-00014

ISSUE: Springfield has completed its evaluation of land needed to provide adequate employment opportunities for the 2010-2030 planning period consistent with Oregon Statewide Planning Goal 9: Economic Development; has prepared Economic and Urbanization comprehensive plan land use policies and land use regulations to support attainment of community economic development objectives; and has evaluated lands to be included in an expansion of the UGB to address land needs that cannot be met within the existing UGB consistent with ORS 197.298 and Oregon Statewide Planning Goal 14: Urbanization.

COUNCIL GOALS/**MANDATE:**

Council Goals: Mandate

Oregon Law requires cities to accommodate urban population and urban employment inside urban growth boundaries to ensure efficient use of land, and to provide for livable communities. The Urban Growth Boundary must be based on demonstrated need for housing, employment opportunities, livability or uses such as public facilities, streets and roads, schools, parks or open space, or any combination of these need categories. In determining need, local governments may specify characteristics, such as parcel size, topography or proximity, necessary for land to be suitable for an identified need. Prior to expanding an urban boundary, local governments shall demonstrate that needs cannot reasonably be accommodated on land already inside the Urban Growth Boundary.

BACKGROUND: Co-adoption by Springfield and Lane County of the proposed Springfield 2030 Plan and Urban Growth Boundary amendments to the Eugene-Springfield Metropolitan Area General Plan (*Metro Plan*) (2030 Plan amendments) is the next step in Springfield-Lane County's multi-year land use planning process to address Springfield's 20-year land needs.

Since ORS 197.304 (HB 3337) required the establishment of separate Urban Growth Boundaries (UGBs) for Eugene and Springfield, Springfield has 1) conducted the land inventories and analyses required under Oregon law to evaluate land needs for the planning period 2010-2030; 2) prepared and adopted a separate Springfield UGB, residential land use policies and implementation measures to address housing needs; and 3) worked collaboratively with Metro Plan partners Eugene and Lane County to adopt "enabling" amendments to the Metro Plan supporting the incremental transition from one shared Metro area comprehensive plan to respective Springfield and Eugene comprehensive plans. Springfield's current UGB was acknowledged in 2011 to provide land to meet the city's housing needs. All of Springfield's 2010-2030 residential growth needs were met without expanding the UGB — through re-designation of land in the Glenwood redevelopment area and other efficiency measures.

Through the multi-year 2030 Plan public involvement process, including the 2008-2009 CIBL Technical and Stakeholder Advisory committee process, surveys, open houses, community workshops, public hearings, neighborhood meetings, and outreach to service providers and public agencies, the City received information from citizens, land owners and advocacy groups.

The City Council has considered a range of alternatives for accommodating employment growth within the existing UGB and in alternative locations around the UGB. Through extensive analysis, public involvement and Council direction, potentially suitable expansion areas for employment were identified. At the September 14, 2015 Work Session, Council directed staff to prepare the 2030 Plan and UGB amendment ordinance — as shown in Attachment 2 Ordinance and Exhibits — for adoption. The proposed 2030 Plan amendments were presented to the City Council, Lane County Board of Commissioners and Lane County Planning Commission at the June 27, 2016 Joint Work Session.

DISCUSSION: Co-adoption of the proposed 2030 Plan amendments by Springfield and Lane County will address Springfield's employment land needs for the 20-year planning period ending 2030. The amendments, as identified in Attachment 1-A and 1-B and as explained in Attachment 2, Exhibit F Staff Report and Draft Findings, establish the comprehensive land use plan designations, policies, land use regulations and amendments to the UGB necessary to provide a 20-year supply of land to meet Springfield's employment land and livability needs as required under Oregon law. The proposed Comprehensive Plan Economic and Urbanization Elements, as described in Ordinance Exhibits B and C will supplant existing Metro Plan land use policies applicable to lands within Springfield's jurisdiction of the Metro Plan. Upon acknowledgement by the State, these Springfield-specific policies will serve to guide future commercial, industrial and mixed-use employment land development and redevelopment activity within the existing Springfield UGB and within the two proposed UGB expansion areas – North Gateway and Mill Race. The proposed UGB expansion also comprises public lands accommodating Springfield's public water system facilities, parks, recreation and open space land needs. A summary of the proposed plan designation and zoning changes and acres of land affected by the proposed changes is included as Attachment 1-B.

At the June 27, 2016 Joint Work Session, the Springfield City Council, Lane County Board of Commissioners, and Lane County Planning Commission were provided with an update on the proposed 2030 Plan amendments and how the proposals have been revised over the past several years to address public input, recent court cases, Goal 14 rulemaking and legislation affecting UGB decisions.

Adoption of the 2030 Plan amendments will fulfill Springfield's comprehensive planning obligations under Statewide Planning Goal 9 Economic Development.

The Springfield Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis (CIBL/EOA) Final Report (Ordinance Exhibit B-2) is the required evaluation of land needed for employment opportunities for the planning period 2010-2030. The CIBL/EOA is a technical report prepared by the City's consultant ECONorthwest that provides empirical data to establish the amount and type of land needed to accommodate forecasted employment growth and target employers. The types of employment that Springfield wants to attract to meet economic development objectives are: high-wage, stable jobs with benefits, and jobs requiring skilled and unskilled labor. This includes a range of industries that will contribute to a diverse economy; and industries that are compatible with Springfield's community values. The CIBL/EOA includes:

- An inventory (supply) of land available for industrial and other employment uses. The inventory identifies lands within the Springfield Urban Growth Boundary (UGB) that are suitable for development and can accommodate employment growth (CIBL/EOA Chapter 2).
- An analysis of Springfield's economic patterns, potentialities, strengths and deficiencies as they relate to state and national trends (CIBL/EOA Chapter 3).
- An employment forecast, an estimate of how much land (demand) is needed to accommodate the 20-year employment forecast, and a description of the types of sites that are needed to accommodate industries that are likely to locate or expand in

- Springfield (CIBL/EOA Chapter 4).
- A comparison of land supply and site needs (CIBL/EOA Chapter 5).

Adoption of the CIBL/EOA is critical to Springfield's ability to plan, zone and develop land within the community consistent with the community's livability and economic prosperity goals and redevelopment priorities. The empirical data contained in the CIBL inventory help the City and its citizens better understand how much and what kinds of land the city has designated for employment in Springfield's developed and vacant land base and how much land may be available for redevelopment. The EOA provides empirical data and analysis to identify which employment sectors and target industries are a good fit with Springfield's workforce and competitive advantages. Together, the CIBL/EOA information identifies the quantities and qualities of commercial, industrial and mixed use sites the City must designate within Springfield's UGB and Comprehensive Plan to provide a sufficient, suitable and viable land base to meet Springfield's employment needs and economic development objectives through the year 2030.

Much employment growth — including all employment requiring sites 5 acres and smaller — can be accommodated on land already inside the UGB. Springfield's land need determination is based on aggressive assumptions about redevelopment (22% of needed jobs), infill of existing built space (10% of needed jobs) and employment accommodated on non-employment land (14% of needed jobs). 77% of needed jobs will be located on land within the existing UGB. The proposed 2030 Plan Economic Element provides a policy "roadmap" for accommodating this amount of employment growth on land already in the UGB.

Revisions to the September 2009 Draft CIBL/EOA Report

The Final CIBL/EOA Report is a revision of the September 2009 Draft CIBL/EOA Report. These changes incorporate feedback about the report and address recent case law. The primary changes to the document are:

- Clarifications to the methods, definitions, and terms used in the buildable lands inventory, including clarifications about potentially redevelopable land in Springfield.
- Analysis of potentially redevelopable sites larger than 5 acres to determine which sites are likely to redevelop over the 2010-2030 planning period.
- Clarifications about Springfield's target industries and their existing site and other characteristics.
- Revision to the number of needed sites by using historical data to identify the number and size of needed sites instead of using a range of needed sites.
- Revision to the categories of needed site size to combine the largest site sizes into one category: sites 20 acres and larger.
- Additional information about the site needs of Springfield's target industries.
- Other clarifications that made the analysis and results clearer.

The Need for a Smaller UGB Expansion to Meet Employment Land Needs

Springfield's need for employment sites larger than 5 acres cannot be met within the existing UGB. 23% of needed jobs will be accommodated on sites in the proposed UGB expansion areas. The revisions to the CIBL/EOA analysis discussed above reduced the amount of suitable employment land needed in the UGB expansion from the 640-acre land need identified in the 2009 Draft CIBL/EOA to 223 acres. The comparison of land supply and site needs in the CIBL/EOA identifies a deficit of larger commercial and industrial land site needs that cannot be met within the existing Springfield UGB. As shown in the CIBL/EOA Table S-5 below, the City needs to expand the UGB to add 223 suitable acres of land to provide seven Industrial and Commercial and Mixed Use employment sites larger than 5 acres. The City assumes that all site

needs for sites smaller than 5 acres will be met within the existing UGB.

Table S-5. Employment site and land needs, Springfield UGB, 2010-2030

	Site Size (acres)			Total
	Less than 5	5 to 20	20 and Larger	
Industrial				
Sites needed	none	none	2	2
Land need (acres)	none	none	126	126
Commercial and Mixed Use				
Sites needed	none	4	1	5
Land need (acres)	none	37	60	97
Total sites needed	none	4	3	7
Total acres needed	none	37	186	223

Source: ECONorthwest

Employment Land and Public Land UGB Expansion Proposal

In determining employment land need, local governments may specify characteristics, such as parcel size, topography or proximity, necessary for land to be suitable for an identified need. Since 2009, the City studied alternative locations for expanding the UGB to identify potentially suitable land to accommodate the site needs of target employment uses that require sites 5 acres or larger.

The City's final selection of areas included in the UGB was prepared after conducting the extensive and prescriptive "Boundary Location Alternatives Analysis" process required by Oregon law (ORS 197.298 and Goal 14) to screen all potentially suitable lands in order of statutory priorities as explained in Ordinance Exhibit F Staff Report and Draft Findings. Cities are required to include lands of higher priority (urban reserves, non-resource "exception" areas and lands zoned "marginal" if those lands are determined to be suitable and serviceable within the planning period to meet the identified site needs. If such lands are not suitable and serviceable, cities next consider including resource (farm and forest) land. The statute requires cities to evaluate potentially suitable resource land sites in order of their soil capability, from least productive to more productive. Goal 14 Boundary Location Factors, (including environmental, economic, social and energy consequences) are applied to the evaluation process as explained in Ordinance Exhibit F Staff Report and Draft Findings.

Springfield's proposed UGB amendment adds approximately 257 acres of suitable employment land in two areas — North Gateway and Mill Race — to add suitable sites to meet the identified need for 223 acres of sites larger than 5 acres. Springfield's final UGB may include some or all land described in the Ordinance or other lands identified through the 2030 Plan amendment public process, consistent with the prioritization requirements of ORS 197.298 and the Oregon Land Use Goal 14 Administrative Rule.

Lands within the North Gateway and Mill Race study areas provide suitable sites that are serviceable within the planning period to meet the site needs of target industries described in the CIBL/EOA, consistent with the prioritization requirements of ORS 197.298 and the Oregon Land Use Goal 14 Administrative Rule, and consistent with applicable comprehensive plan policies. Both areas have large, flat suitable sites contiguous with the UGB and city limits, thus no inefficient or costly "leapfrogging" will be required for a property owner to annex and develop. Both areas are within ½ mile of I-5 or Oregon Highway 126 and are within ½ mile of the regions' existing and planned frequent transit network.

Employment Opportunity Sites Added - North Gateway UGB Expansion (Maps: Ordinance Exhibit A).

Adoption of this proposal would add two 50-acre sites to Springfield's UGB. The two sites (Wicklund Family Trust and Puzzle Parts LLC) are contiguous and could also be combined to create one 100-acre site. Both sites are immediately adjacent to the existing UGB and contiguous with Springfield city limits. The proposal would also add one 20-acre site that is not contiguous with the city limits (Johnson). The suitable employment land is proposed to be designated Urban Holding Area- Employment. Adopting a proposal that includes a large balance of the needed suitable land in one location will support an efficient and economical land use pattern and the ability to comprehensively plan and serve the area in relationship to the abutting Gateway/International Way employment center.

Natural Resource Designation of Land Within McKenzie River Floodway.

The McKenzie River frontage of the proposed North Gateway UGB expansion area, including the floodway portions of the Wicklund and Johnson sites, is proposed to be designated Natural Resource. This is in response to input from the Council and County Commissioners about extending Springfield's UGB and planning jurisdictional area to the river, rather than leaving a strip of Lane County-administered land between the UGB and the river. Including the floodway land in the UGB is logical in that it will facilitate consistent regulation of the floodway, riparian area and natural resources through application of Springfield Development Code standards, while avoiding division of parcels.

The EWEB property included in the North Gateway UGB expansion (developed with electrical transmission facilities and the Rainbow Water District wells) is proposed to be designated Public/Semi-Public.

Employment Opportunity Sites Added – Mill Race UGB Expansion (Maps: Ordinance Exhibit A). Adoption of this proposal would add large employment sites immediately abutting Springfield's UGB and contiguous with the city limits that are not in the 100-year floodplain. The proposal would add one 20-acre site (Johnson Family Trust) with frontage on South 28th Street. The Springfield Utility Board (SUB) site (formerly owned by Knife River) would provide 57.2 suitable acres. This SUB site abuts another SUB-owned industrial site that is already inside the UGB and the Swanson Mill property, and is accessible from M Street and through an easement on the Swanson site.

Staff included the smaller parcels located south of M Street in the UGB, rather than leaving an area of Lane County-administered land surrounded by Springfield's UGB. This will provide for clear jurisdictional boundaries and avoid creating a "doughnut" of Metro Plan/Springfield UGB parcels surrounding County-administered Lane County Rural Comprehensive Plan parcels. The total acreage of the smaller parcels is approximately 50 acres of which approximately 46.6 acres are potentially developable (without absolute constraints).

Public/Semi Public Land Included in Proposed UGB (Maps: Ordinance Exhibit A).

The Mill Race study area includes 373.1 acres of public lands owned by SUB, City, and Willamalane Park and Recreation District. The area is developed with Willamalane's Clearwater and Georgia Pacific parks and Middle Fork Path and SUB's Willamette Well Field and drinking water treatment facilities. Additionally, three existing Willamalane parks that occupy a total of 72 acres along the northern edge of the UGB are included in the proposed UGB: Ruff Park, Lively Park, and Oxbow.

Proposed UGB Expansion and Land Use Designations

Area	Suitable Employment Acres Designated Urban Holding Area – Employment (UHA-E)	Acres Designated Natural Resource (NR)	Acres Designated Public/Semi Public (P/SP)	Gross Acres (inc. right of way)
North Gateway	132.1	53.3	9.7	212.4
Mill Race	125	0	373.1	508.1
Other Parkland	0	0	72	72
Total Land Added	Total Suitable 257.1	Total Natural Resource 53.3	Total Public /Semi Public 454.8	792.5
CIBL/EOA suitable land need	223			

Public Process 2009 to Present.

Notice of the proposed 2030 Plan amendments was provided to DLCD on December 31, 2009 and the first evidentiary hearing was conducted by the Springfield and Lane County Planning Commissions at a joint hearing on February 17th and March 16th, 2010 (Springfield File No. LRP 2009-00014, Lane County File No. PA09-6018). The hearing was closed on March 26th, 2010. The City Council and Lane County Board of County Commissioners were originally scheduled to conduct a public hearing on the draft 2030 Plan on July 26, 2010. However, many important issues were raised by the Department of Land Conservation and Development staff, the Planning Commissions and members of the public during the initial review process. Council directed staff to allow sufficient time to prepare thorough and comprehensive consideration of the input received and to prepare the second draft of plan documents for the next public hearing. Staff, in consultation with the City legal team, also recommended that the City pay close attention to pending Court of Appeals decisions and other legal rulings that will affect the State's review of Springfield Urban Growth Boundary amendment proposal. These matters led the City to adjust the 2030 Plan adoption schedule as necessary to:

- Adopt the Springfield UGB, Residential Element, Land Use Efficiency Measures and Glenwood Phase One plan amendments to address 20-year housing needs in a timely manner;
- Ensure efficient coordination with concurrent City and Metro partner comprehensive planning activities including necessary “enabling” amendments to the Metro Plan;
- Clarify and address issues raised in the hearing process;
- Address significant issues raised in recent and pending legal decisions regarding UGB expansions.

Subsequent to the 2010 Planning Commission hearing, notice of the proposed Agriculture – Urban Holding Area Zoning District (AG) code amendment was provided to DLCD on November 14, 2013. The first evidentiary hearing on the AG District code amendment was conducted by the Springfield and Lane County Planning Commission on December 18, 2013 (File No. TYP 413-00007). The record of File No. TYP 413-00007 is incorporated into the 2030 Plan amendments.

Given the length of time between the first evidentiary hearings and final hearing on the 2030 Plan and UGB amendments, staff prepared a summary of the Planning Commission hearing

process and recommendations (Attachment 1-C) to provide background information to the elected officials, Lane County Planning Commission and the public.

RECOMMENDED ACTION/OPTIONS

Conduct Council's first reading of the ordinance and joint public hearing to receive evidence in conjunction with adoption of proposed 2030 Plan amendments. After testimony is received, the Council and the Lane County Board may choose to:

1. Close the hearing but leave the record open for a certain amount of time.
 2. Continue the public hearing.
 3. Close the hearing and deliberate at a future date.
 4. Currently, staff has reserved October 10th and November 7th on the Council and Board's agenda calendars for this item.
-

Summary of Proposed 2030 Plan Amendments

The proposed Springfield-Lane County 2030 Plan Amendments include the following actions:

- Adopt **Exhibit B** Springfield 2030 Comprehensive Plan Economic Element and its Technical Supplement — the Springfield Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis (CIBL/EOA) — as Springfield’s comprehensive plan in compliance with Statewide Planning Goal 9, Economic Development. The Economic Element contains city-specific goals, policies, implementation measures and findings to address Springfield’s land needs for economic development and employment growth for the 2010-2030 planning period, replacing *Metro Plan* Economic Element policies applicable to lands within Springfield’s jurisdictional area;
- Adopt **Exhibit C-1** Springfield 2030 Comprehensive Plan Urbanization Element as Springfield’s comprehensive plan in compliance with Statewide Planning Goal 14, Urbanization. The Urbanization Element contains Springfield’s city-specific goals, policies, implementation measures and findings to address land needs for the planning period 2010-2030, replacing *Metro Plan* Urbanization and Growth Management policies applicable to lands within Springfield’s jurisdictional area;
- Adopt **Exhibit C-1 and C-2** amending Springfield Urban Growth Boundary (UGB),¹ Springfield UGB map and UGB Technical Supplement depicting and describing the UGB. Amend Metro Plan Boundary to be coterminous with the UGB. (Lane County will amend the Lane County Rural Comprehensive Plan (RCP) boundary to be coterminous with the UGB and Metro Plan Boundary to reflect the boundary change.)
 - Expands the Springfield UGB to add approximately 257 suitable acres of employment land on 273 gross acres in two expansion areas – North Gateway and Mill Race.
 - Expands the Springfield UGB to include approximately 455 acres of existing public land, parks and open space.
- Adopt **Exhibit D** amending Metro Plan text:
 - Amend Chapter II, Section C Metro Plan Growth Management Goals, Findings, and Policies to add the following paragraph: “Sub-chapter II-C no longer applies

¹ All references in this report to amendment of “Springfield UGB”, “UGB amendments” or “UGB expansion” also reference concurrent amendments to the Metro Plan boundary and Lane Rural Comprehensive Plan Boundary to be coterminous with the amended Springfield UGB.

to Springfield. In 2016, the City of Springfield and Lane County adopted the Springfield 2030 Comprehensive Plan Urbanization Element, Ordinance No. XXXX and Lane County Ordinance No. XXXX, as Springfield’s comprehensive plan in compliance with Statewide Planning Goal 14, Urbanization. The Urbanization Element contains Springfield’s city-specific goals, policies, implementation measures and findings to address land needs for the planning period 2010-2030.”

- Amend Chapter II, Section E Metro Plan Urban and Urbanizable Land to add the following paragraph: “Sub-chapter II-E no longer applies to Springfield. In 2016, the City of Springfield and Lane County adopted the Springfield 2030 Comprehensive Plan Urbanization Element, Ordinance No. XXXX and Lane County Ordinance No. XXXX, as Springfield’s comprehensive plan in compliance with Statewide Planning Goal 14, Urbanization. The Urbanization Element contains Springfield’s city-specific goals, policies, implementation measures and findings to address land needs for the planning period 2010-2030.”
- Amend Metro Plan Chapter III, Section B Metro Plan Economic Element to add the following paragraph: “Sub-chapter III-B no longer applies to Springfield. In 2016, the City of Springfield and Lane County adopted the Springfield 2030 Comprehensive Plan Economic Element, Ordinance No. XXXX and Lane County Ordinance No. XXXX, as Springfield’s comprehensive plan in compliance with Statewide Planning Goal 9, Economic Development. The Economic Element contains city-specific goals, policies, implementation measures and findings to address Springfield’s land needs for economic development and employment growth for the 2010-2030 planning period.”
- Amend Metro Plan Chapter II, Section G Land Use Designations to add a new land use designation applicable to Springfield’s jurisdictional area of responsibility — the Urban Holding Area-Employment (UHA-E) plan designation;
- Amend Metro Plan Chapter II, Section G. Metro Plan Land Use Special Heavy Industrial designation page II-G-8 to delete the Springfield-specific reference to the Natron Special Heavy Industrial (SHI) site; and
- Amend Metro Plan Chapter II, Section G, footnote 7, to add a reference to the subject UGB amendment ordinance.

- Adopt **Exhibit A** amending Metro Plan Diagram² to assign Metro Plan designations to lands added to the UGB:
 - Assign the “Urban Holding Area – Employment” (UHA-E) Metro plan designation to approximately 273 acres to meet Springfield’s long range employment land need for 7 employment sites on 223 suitable unconstrained acres;
 - Assign the “Natural Resource” (NR) Metro plan designation to approximately 53 acres of land within the McKenzie River Floodway in the North Gateway area;
 - Assign the “Public/Semi Public” (P/SP) Metro plan designation to approximately 455 acres of existing publicly-owned land, parks and open space.
- Adopt **Exhibit E** amending Springfield Development Code Chapter 3 Land Use Districts establishing Section 3.2-900 Agriculture—Urban Holding Area (AG) Zoning District to implement the Urban Holding Area – Employment plan designation and Natural Resource plan designation.
- Adopt **Exhibit A-3** amending Springfield Zoning Map to assign Springfield zoning to lands added to UGB
 - Assign Agriculture—Urban Holding Area Zoning District to lands designated Urban Holding Area- Employment (UHA-E) and Natural Resource (NR);
 - Assign Public Land and Open Space (PLO) Zoning District to lands designated Public/Semi Public.

This proposal also requires concurrent actions by Lane County to amend the Lane County Rural Comprehensive Plan. These actions are addressed in Lane County’s staff report File No. 509-PA13-05393.

- Amend Lane County Rural Comprehensive Plan boundary to be coterminous with the UGB and Metro Plan Boundary to reflect the boundary change.
- Amend Lane County’s plan designation and zoning maps to reflect the 2030 Plan Metro Plan Diagram and Springfield Zoning Map amendments.

² The Metro Plan boundary, Lane Rural Comprehensive Plan boundary and Lane County plan and zoning maps are amended concurrently to reflect the amended UGB, plan and zoning designations shown in Exhibit A and C.

Comprehensive Plan map amendments

North Gateway gross acres (including right of way)	From	To
139.4	Lane County Rural Comprehensive Plan (LCRCP) Agriculture	Metro Plan Urban Holding Area-Employment
9.7	LCRCP Agriculture	Metro Plan Public/Semi Public
53.3	LCRCP Agriculture	Metro Plan Natural resource
Mill Race acres gross acres (including right of way)	From	To
133.2	LCRCP Agriculture	Metro Plan Urban Holding Area-Employment
1.8	LCRCP Parks	Metro Plan Urban Holding Area-Employment
224.6	LCRCP Parks	Metro Plan Public/Semi Public
148.4	LCRCP Agriculture	Metro Plan Public/Semi Public
0.1	LCRCP NR Mineral	Metro Plan Public/Semi Public
Willamalane Parks acre gross acres	From	To
16.4	LCRCP Agriculture	Metro Plan Public/Semi Public
55.6	LCRCP Parks	Metro Plan Public/Semi Public
TOTAL GROSS ACRES	From	To
272.6	Lane County Rural Comprehensive Plan (LCRCP) Agriculture	Metro Plan Urban Holding Area-Employment
0.1	LCRCP Parks	Metro Plan Urban Holding Area-Employment
53.3	LCRCP Agriculture	Metro Plan Natural Resource
174.5	LCRCP Agriculture	Metro Plan Public/Semi Public
280.2	LCRCP Parks	Metro Plan Public/Semi Public
0.1	LCRCP NR Mineral	Metro Plan Public/Semi Public

Zoning map amendments

North Gateway gross acres	From	To
192.8	Land County (LC) Exclusive Farm Use (EFU 30)	Agriculture- Urban Holding Area (AG)
9.7	LC Exclusive Farm Use (EFU 30)	Public Land & Open Space (PLO)
Mill Race gross acres	From	To
135.0	LC Exclusive Farm Use (EFU 25)	Agriculture- Urban Holding Area
238.3	LC Exclusive Farm Use (EFU25)	Public Land & Open Space (PLO)
93.1	LC Parks & Recreation (PR)	Public Land & Open Space (PLO)
41.6	LC Sand & Gravel (SG)	Public Land & Open Space (PLO)

Willamalane Parks (north) gross acres	From	To
55.6	LC Exclusive Farm Use (EFU 40)	Public Land & Open Space (PLO)
16.4	LC Exclusive Farm Use (EFU 30)	Public Land & Open Space (PLO)
TOTAL GROSS ACRES	From	To
192.8	Land County (LC) Exclusive Farm Use (EFU 30)	Agriculture- Urban Holding Area (AG)
135.0	LC Exclusive Farm Use (EFU 25)	Agriculture- Urban Holding Area (AG)
238.3	LC Exclusive Farm Use (EFU 25)	Public Land & Open Space (PLO)
26.1	LC Exclusive Farm Use (EFU 30)	Public Land & Open Space (PLO)
55.6	LC Exclusive Farm Use (EFU 40)	Public Land & Open Space (PLO)
92.8	LC Parks & Recreation (PR)	Public Land & Open Space (PLO)
.1	LC Parks & Recreation (PR)	Agriculture- Urban Holding Area (AG)
41.6	LC Sand & Gravel (SG)	Public Land & Open Space (PLO)

TOTAL GROSS ACRES IN UGB EXPANSION	792 ACRES
TOTAL GROSS ACRES DESIGNATED URBAN HOLDING EMPLOYMENT	273 ACRES
TOTAL UNCONSTRAINED URBAN HOLDING EMPLOYMENT	257 ACRES
TOTAL GROSS ACRES DESIGNATED NATURAL RESOURCE	53 ACRES
TOTAL GROSS ACRES DESIGNATED PUBLIC/SEMI-PUBLIC	455 ACRES
TOTAL GROSS ACRES ZONED AGRICULTURE – URBAN HOLDING AREA	328 ACRES
TOTAL GROSS ACRES ZONED PUBLIC LAND & OPEN SPACE	455 ACRES

MEMORANDUM

City of Springfield

To:	Springfield City Council, Lane County Board of Commissioners and Lane County Planning Commission
From:	Linda Pauly, Principal Planner
Date:	September 12, 2016
Subject:	Planning Commission Public Hearings on 2030 Plan amendments: Process Summary and Commission Recommendations

The Springfield and Lane County Planning Commissions conducted the first evidentiary hearings on the proposed 2030 Plan amendments. Given the length of time since these hearings, staff prepared the following summary to provide background information to the elected officials, Lane County Planning Commission and the public.

1. Public Hearing on Proposed Economic Element, Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis (2009 Draft CIBL/EOA), Urbanization Element and Urban Growth Boundary (UGB) Employment Land Expansion Concepts. (February 17, 2010 to May 4, 2010).

On February 17th and March 16th, 2010 the Springfield and Lane County Joint Planning Commissions conducted a joint public hearing on the 2030 Plan and UGB amendments. The subject 2030 Plan and UGB amendments were considered as part of a larger 2030 Plan package of land use policy and land use regulation amendments to address Springfield’s land needs for the 2010-2030 planning period.

The City received 52 documents on this matter from interested parties and 22 persons appeared at the two public hearings; both oral and written testimony was entered into the record during the hearings. The staff report, the oral testimony, letters received, written submittals of the persons testifying at the hearing, and the public record for file # LRP 2009-00014 were considered and incorporated into the record. The joint hearing conducted by the Springfield and Land County Planning Commissions was continued to March 16th, 2010, and the written record of the hearing was extended until March 26, 2010. Responses to testimony and to comments submitted by DLCD staff were provided in a 40-page memorandum from Planning Manager Gregory Mott, dated April 20, 2010. (Planning Commission Memorandum for April 20, 2010 Regular Session, Planning Commission Transmittal Memorandum Attachment 2). For complete documentation of the hearing process, see Springfield File No. LRP 2009-00014 and Lane County File No. PA 09-6018.

The Planning Commissions were asked to consider the evidence in the record and forward recommendations to their respective elected officials regarding co-adoption of the proposed policy package, which included the 2009 Draft CIBL/EOA and 2009 Draft 2030 Plan Economic and Urbanization

Element policies to provide a 20-year supply of commercial and industrial sites consistent with Springfield's community development objectives.

At the April 20 and May 4, 2010 meetings, the Planning Commissions began their deliberations of the proposals. As documented in the meeting minutes, the commissioners discussed a series of action items including:

- Action Item 2: Economic Element and 2009 Draft CIBL/EOA
- Action Item 3: Urbanization Element and Springfield Urban Growth Boundary. The Planning Commissioners were asked to review and discuss three UGB expansion concepts and to select a preferred alternative for expansion of the Urban Growth Boundary (UGB). The Planning Commissions were asked to recommend one or a combination of the three concepts or another alternative.
- Question 18: Urban Holding Area Plan Designation

As documented in the meeting minutes, the Planning Commission recommendations are summarized as follows.

Action Item 2: Economic Element

The Springfield Planning Commission supported Action Item 2 with a 7:0 vote, and the Lane County Planning Commission was split 3:5, with Commissioners Dignam, Noble and Sullivan supporting the item, and Commissioners Arkin, Goldstein, McCown, Nichols, and Siekiel-Zdzienicki opposing the item.

The Lane County Planning Commissioners opposed stated the following opinions:

- McCown: Skeptical of need for 640 acres, preferred to see rezoning or upzoning of existing sites to meet need for larger sites.
- Arkin: Predictions for economic growth were overstated and did not consider the availability of vacant, large industrial sites along I-5 and in Junction City, for which there was not a demand. Study did not adequately account for a majority of employment in the small business sector and for the growth of small farms. Study assigned too few jobs per acre and was not a good use of highly constrained land. Cost of developing large parcels and extending City services was a questionable use of funds.
- Goldstein: Uncomfortable with lack of goals for the land use, needs better focus on infrastructure needs.
- Nichols: Did not see a need for 640 acres, but the addition of some larger sites was justified. Policy should encourage redevelopment.
- Siekiel-Zdzienicki: Concerned about the amount of constrained land. Requested FEMA maps that showed the location of the floodplain related to development along the river.

Action Item 3: Urbanization Element and Springfield Urban Growth Boundary

An employment land UGB expansion of about 640 acres was proposed, based on the 2009 Draft CIBL/EOA. At the February 17, 2010 meeting, the City's consultant Robert Parker of ECONorthwest presented three UGB expansion concepts for consideration. The purpose was to solicit comments and direction on UGB expansion concepts and to move toward a preferred alternative. Mr. Parker reviewed the CIBL Stakeholder and Technical Advisory Committees process and recommendations, the five Planning Commission and Council joint work sessions, the public workshop and open houses conducted 2008-2010, the technical analysis conducted by ECONorthwest, and how the CIBL stakeholder and technical committees had identified study areas that were potentially suitable to meet the identified employment land need. Mr. Parker explained the key statutes, goals and rules applicable to UGB amendment decisions, and how Goal 14 Urbanization is interpreted by LCDC rules and decisions, LUBA opinions, and court decisions. Mr. Parker described the Boundary Alternatives Analysis process as it applies to employment lands. He stated that the three concepts were developed to comply with state rules. Using a series of maps, he showed how study areas around the UGB were analyzed based on zoning, distance, constraints and soils. He stated that the UGB expansion concepts emphasized areas identified by the committees and were "intended to be different enough to demonstrate trade-offs."

- Concept 1: North Gateway, Seavey Loop, South of Mill Race
- Concept 2: North of 52nd Street, South of Mill Race and Seavey Loop
- Concept 3: North Gateway, Seavey Loop, North of 52nd Street.

The commissioners deliberated the merits of each Concept.

Concept 1 support:

- Lane County Planning Commission: Arkins, Dignam, Sullivan.
- Springfield Planning Commission: Kirschenmann, VanGordon.

Concept 2 support:

- Lane County Planning Commission: no support
- Springfield Planning Commission: no support

Concept 3 support:

- Lane County Planning Commission: Dignam, Goldstein.
- Springfield Planning Commission: no support

Combined Concept 1 and 3 Support:

- Lane County Planning Commission: Dignam, Goldstein, McCown, Nichols, Sullivan.
- Springfield Planning Commission: Beyer, Kirschenmann, Moe, Moore, Smith, VanGordon

Modified Concept 1 support:

- Lane County Planning Commission: Noble, Nichols.
- Springfield Planning Commission: Beyer.

Support for moving forward with a recommendation based on the opinions of commissioners and agreements that could be identified:

- Lane County Planning Commission: Arkin, Dignam, Goldstein, McCown, Nichols, Noble, Sandow, Sullivan.
- Springfield Planning Commission: Beyer, Cross, Kirschenmann, Moore, Smith, VanGordon.

Thus, the Commissioners chose to forward their individual opinions rather than unified recommendations to the elected officials. The minutes from the April 20 and May 4, 2010 meetings are attached to this memorandum.

Question 18: Urban Holding Area Plan Designation

- Lane County Planning Commission: Commissioners Dignam, McCown, Nichols, Noble, and, Sullivan voted in favor, and Commissioners Arkin, Sandow, and Mr. Siekiel-Zdzienicki voted against.
- Springfield Planning Commission: Unanimously supported Question 18, 7:0

Question 19: Urban development Urban Holding Area Plan Designation must be consistent with CIBL/EOA site needs criteria for inclusion in UGB.

- There was consensus that this was strictly a City of Springfield issue on which the Lane County Planning Commission would not vote.
- Springfield Planning Commission: Unanimously supported Question 19, 6:0.

Question 20: Proposal to preserve large “newly urbanizable” sites.

- There was consensus that this was strictly a City of Springfield issue on which the Lane County Planning Commission would not vote.
- Springfield Planning Commission: Unanimously supported Question 20, 6:0.

Springfield Planning Commission Motion:

Mr. Beyer, seconded by Mr. Kirschenmann, moved to recommend the elected officials adopt the Springfield 2030 Refinement Plan including establishing a separate Urban Growth Boundary for the City of Springfield. The motion passed unanimously, 6:0.

Lane County Planning Commission Motions:

- Ms. Arkin, seconded by Mr. McCown, moved to recommend the elected officials adopt the Springfield 2030 Refinement Plan including establishing a separate Urban Growth Boundary for the City of Springfield. The motion passed unanimously, 8:0.

- Mr. McCown, seconded by Ms. Nichols, moved to advance the Springfield 2030 Refinement Plan forward to the BCC without a recommendation for specific areas for the UGB expansion and for the Board to review the Planning Commission deliberations to understand the Planning Commission concerns. The motion passed unanimously, 8:0.
- Mr. Sullivan, seconded by Mr. Dignam, moved that Lane County Planning Commission recommend that prior to initiation of the process by the BCC, comments made by individuals regarding options and larger maps, be presented at the beginning of the process; and that a workshop be conducted to streamline the process. The motion passed unanimously, 8:0.

Lane County Planning Commission subsequently conducted a work session with the Lane County Board to convey their individual recommendations and concerns to the Board.

The Planning Commissions were informed that the final decision on adoption of the Springfield Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis shall be made by the Springfield City Council and the Lane County Board of Commissioners and that subsequent action would rely in part on the 2009 Draft CIBL/EOA document, a variation of this document, or entirely new documentation. The staff report of the April 20, 2010 meeting stated: “The adoption of a UGB is an iterative process, and depending on how the record develops, the background assumptions, analysis and determinations in the Springfield Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis may change.”

The Joint Planning Commissions concluded their proceedings on May 4, 2010.

2. Public Hearing on Proposed AG Zoning District.

On December 18, 2013, the Springfield Planning Commission conducted the first evidentiary hearing on “proposed Springfield Development Code (SDC) Amendments to implement the propose Urban Growth Boundary (UGB) Expansion” (Springfield File No. TYP 413-00007). The proposal was reviewed during a Planning Commission work session held on November 19, 2013. The proposed AG Zoning District was presented in the Staff Report for the December 18, 2013 meeting as Attachment 2, pages 1-5.

One person testified in favor of the proposed code, no persons testified against or neutral. The Planning Commission found that the proposed amendments are consistent with the criteria of SDC Section 5.6-115A-C, supported by specific findings of fact and additional information submitted for the December 18, 2013 public hearing. The Planning Commission forwarded a recommendation for approval to the Springfield City Council and Lane County Board of Commissioners for their consideration.

Attachments

- 1-C-1 Minutes from April 20, 2010 Joint Planning Commission meeting

- 1-C-2 Minutes from May 4, 2010 Joint Planning Commission meeting
- 1-C-3 Springfield Planning Commission recommendation – AG Zoning District

MINUTES

JOINT WORK SESSION OF
SPRINGFIELD AND LANE COUNTY PLANNING COMMISSIONS
City Council Chambers
230 Fourth Street—Springfield

April 20, 2010
6:00 p.m.

SPRINGFIELD PLANNING COMMISSION: Frank Cross, Chair; Johnny Kirschenmann, Vice Chair; Lee Beyer, Eric Smith, Sheri Moore, Steve Moe, Sean VanGordon, members; Linda Pauly, Greg Mott, Bill Grill, Steve Hopkins, staff; Mary Bridget Smith, Bill Van Vactor, City Attorney.

LANE COUNTY PLANNING COMMISSION: Robert Noble, Chair; Tony McCown, Vice Chair; Lisa Arkin, Steve Dignam, George Goldstein, Nancy Nichols, Joseph Siekiel-Zdzienicki, John Sullivan, members; Kent Howe, Matt Laird, Stephanie Schulz, staff.

Commissioner Cross convened the meeting.

1. BUSINESS FROM THE AUDIENCE

There was no business from the audience.

2. LEGISLATIVE PUBLIC HEARINGS—Continued meeting from March 16, 2010.

- Metro Plan Amendment, Springfield 2030 Refinement Plan LRP2009-00014;
- Springfield Development Code Amendments LRP2009-00015;
- Lane County PA 09-6018.

Co-Adopters: The City of Springfield and Lane County
Staff: Greg Mott and Linda Pauly, City of Springfield
Stephanie Schulz, Lane County

Commissioner Cross explained the purpose of tonight's meeting was to conduct the deliberation phase of the legislative public hearing continued from March 16, 2010. The public hearing testimony was closed on March 26, 2010, thus no new evidence would be presented tonight. The commissions would consider the evidence at hand to make recommendations to the elected officials.

Commissioner Cross opened deliberations for the Springfield Planning Commission.

Commissioner Noble opened deliberations for the Lane County Planning Commission.

Commissioner Moe arrived at 6:05 p.m.

Commissioner Cross stated the plan for this evening was to develop a consensus regarding Action Items detailed in Attachment 1, *Decision Matrix for April 20 Joint Planning Commission Meeting* included in the Planning Commission Transmittal Memorandum published for this meeting. Commissioners reviewed the process for this evening's deliberations.

Commissioner VanGordon arrived at 6:10 p.m.

Commissioner Beyer observed a number of individuals had requested that their properties, most of which were residential, be redesignated or rezoned. However, those requests did not fit this process although many of the requests made sense to Commissioner Beyer. He asked if there was a process that could follow the current one that would allow the City to address those issues.

Ms. Pauley Springfield Planning Supervisor said the City currently offered a process that would allow for property owners to request zone changes.

Mr. Mott Springfield Planning Manager added the Planning Commission could recommend that the elected officials consider making changes on a site specific basis to be included with the actions for the Metro Plan, Refinement Plan and Development Code recommendations. If the City Council decided to do that, staff would prepare findings. Staff could make no promises what it would do post 2030 Refinement Plan adoption that would capture those changes. The commission was aware the City needed to revisit all of the refinement plans and to look at the Main Street corridor related to plan zone conflicts, varying densities, in conjunction with existing requirements related to access management on that road.

Ms. Pauley offered a PowerPoint presentation on Attachment 1. She facilitated a discussion of:

- Issue 1, *Co-adopt Eugene-Springfield Metro Plan Amendment: Springfield 2030 Refinement Plan (LRP 2009-00014/PA 09-6018)*.

--Action Item 1: Residential Land and Housing Element

Commissioner Moore asked how many people have suggested that although the data indicated there was a sufficient supply of low and medium residential land, it may not be in the right place, or some property owners would like to see their property brought into the UGB. She asked if the plan as written was to be implemented and if in the future it was determined there was a need for more residential land, would it be possible to revisit the needs analysis.

Mr. Mott said the State of Oregon would require periodic review of the plans to evaluate their effectiveness seven to ten years after their adoption. The Metro Plan policy required an annual report to determine the inventory. The City of Springfield could initiate an amendment prior to periodic review if circumstances called for it. It was likely that periodic review would include a review of the residential land inventory.

Mr. Grile Springfield Development Services Director added it was customary in other jurisdictions for individual land owners to seek amendments to the Urban Growth Boundary (UGB).

Commissioner Cross asked commissioners whether they agreed or disagreed with the recommendation for Action Item 1.

Commissioner McCown believed the use of up zoning was appropriate and agreed with the recommended action.

Commissioner Smith thought the City had erred in being too conservative in estimating future growth and questioned whether there were sufficient buildable lands. Based on the available data, he begrudgingly agreed with the recommended action.

Commissioner Goldstein expressed a deep mistrust for consultants and was concerned about how the figures came about. The entire process was so complex that one could only set goals that would evolve over time.

Commissioner Moore thought time would show the figures too conservative. However, based on the information available, she agreed with the recommended action.

Commissioner Siekiel-Zdzienicki would go with the numbers, noting Springfield needed to be conservative due to land use constraints.

Commissioner Moe noted the data said 90 acres would support 6,000 units. He questioned where that number of units would be located.

Commissioner Dignam did not support Action Item 1. He had great confidence in the work of ECONorthwest and was sure they did an outstanding job on this project. Based on the evidence in the record, he thought there was insufficient residential land, which concerned him. While members of the development and builder community brought a bias to the process through their testimony, he said the development and builder community was closer to the issue than anyone else, and perhaps offered a greater level of expertise that had been overlooked. There were not sufficient residential lands and would respond “No” to Questions 1, 2 and 3.

Commissioner Beyer had been part of the process related to residential, commercial and industrial lands for three years. He asserted the details and methodology of the work of ECONorthwest was solid work. He said ECONorthwest used a conservative number that came from the Lane County study which underestimated the projections. He opined forecasts were always wrong. Commissioner Beyer would support Action 1 because the process needed to be completed. Success of the process depended on Springfield being able to achieve the needed densities. Most of the densities were intended to come from land management techniques. The task forces that worked on the project looked at approximately fourteen criteria established by the State, twelve of which Springfield had already met. The hope was that those techniques that had worked moderately well in the past would work better in the future. If the techniques did not work, the process could be reviewed and changed in the future. Although the City had enough land for the next five years, the land focused on was predominately in the hills and expensive to develop. It was difficult to develop affordable housing which was an issue for him.

Commissioner Arkin would support the Action Item as a fact based proposal. She recalled that the redevelopment proposal for Glenwood as reviewed by the Lane County Planning Commission had been exciting, with an affordable housing component. She thought it smart to forecast in a conservative manner, which she preferred to pulling back at some point in the future. The proposed development along transportation corridors was smart.

Commissioner VanGordon echoed the sentiment that the proposal was too conservative, but the commissioners needed to accept the facts before them. He thought the proposal conservative due to the change in the housing market during the last few years which drove down the forecast data. Since forecasts were always wrong, the City could move forward and revisit as the housing market improved.

Commissioner Nichols would support Action Item 1 based on the information provided to commissioners.

Commissioner Sullivan would support Action Item 1, primarily to move it forward. It was a responsibility for the Lane County Planning Commissioners to work hard to provide a complete record for review by the elected officials.

Commissioner Kirschenmann, as a member of the commercial/industrial task team, echoed Commissioner Beyer’s comments. He stated ECONorthwest was a sound firm. Commissioner Kirschenmann was also concerned with the conservative estimates, and would have preferred the figure remain at 1.2 rather than .9. Builders were always concerned that they could not find lots to buy on flat land.

Commissioner Noble would support all three Questions in Action Item 1. He too was concerned about the amount of residential land available which would push the City of Springfield to be thoughtful about development processes. He was concerned about the ramifications of constrained UGBs for both the City of Springfield and the City of Eugene as well as for Lane County. He asked if would mean more rural development, or more development in Creswell, Cottage Grove, Veneta, Coburg, which would negatively impact the transportation systems. He agreed the City of Springfield was geographically constrained and thought needed to be given to where the City would push out and for what purposes. The proposal before the commissions was compliant with State law.

Commissioner Siekiel-Zdzienicki inquired about Question 3, *do the proposed Implementation Actions address housing needs*, bullet 6. He asked if this was proposed because the land was difficult to develop due to the high number of property owners in the Glenwood Riverfront Plan District.

Ms. Pauley responded that the proposal under development by the Citizen Advisory Committee (CAC) and the consultant team would show that people wanted to see a residential neighborhood in Glenwood. There would be commercial uses as well.

--Action Item 2: Economic Element

Commissioner McCown was leaning towards “No” on Action Item 2. He was skeptical of the need for 640 acres for employment sites larger than 20 acres. He preferred to see rezoning or upzoning of existing sites to redevelop some properties to meet the need. He agreed that larger sites throughout the region were needed for industrial lands.

Commissioner Smith supported Action Item 2 to assemble larger manufacturing sites for examples discussed in the visioning process for 2030. It was not affordable to use a piecemeal process to assemble sites. It was prudent to allow for 20 acre sites for larger uses. He suggested 600 acres may not be enough land for a 20 year period, noting he saw this proposal as more accurate than the residential proposal.

Commissioner Goldstein was concerned with the broad brush approach being used for the differing uses of retail, manufacturing and industrial, especially for infrastructure needs. He was not uncomfortable with the amount of land, but was uncomfortable with the lack of goals for the land use. He could not say yes to Action Item 2 until he saw a better focus on the infrastructure needs.

Commissioner Moore was concerned about the regional aspect of the economic element, noting employment did not need to be in Springfield for Springfield’s residents. She did understand that it would be beneficial for the City to have a better tax base offered by commercial and industrial land. She was torn because she did not want to have an industrial complex along the river, but she saw a need to move forward.

Commissioner Siekiel-Zdzienicki would not support Action Item 2. He iterated his concern about the amount of constrained land. The current proposal would use 600 of the 2,000 available acres through this process. Staff had said that density of employment per acre was not a requirement, but because the City was limited he thought employment density needed to be used as a factor for sites over 20 acres. He said he would not support any action until he had seen Federal Emergency Management Agency (FEMA) maps that showed the location of the flood plain related to development along the river.

Commissioner Cross noted that the economic element was not whether the City would expand the UGB or where that expansion would occur, but rather whether or not there was a need in Springfield for additional commercial/industrial land. The location of any expansion would be covered under Action Item 3.

Commissioner Moe said FEMA maps were always changing. He supported Action Item 2 because the City hoped to attract larger employers in the future, but larger sites were needed to accommodate their needs.

Commissioner Dignam would support Action Item 2. There was a need for additional commercial/industrial land. While upzoning or enforcement of higher density employment requirements may be desirable on the City’s part, if the private sector did not like that or could not make use of it, nothing would happen. If the commissions wanted to ensure that the plan would meet Goal 9 for development, the commissions needed to be willing to be flexible to accommodate employment needs. The record justified an increase in commercial/industrial land.

Commissioner Beyer stated the proposal was reasonable proposal. ECONorthwest put as much attention into the commercial/industrial side as it did the residential side of the proposal. Most of the small commercial needs were being met through redevelopment of Glenwood. Most of the larger sites consisting of 250 to 300 acres identified in the original Metro Plan for the Gateway area, including Sony, PeaceHealth, and others, had been developed. A major strength in the Springfield area was it was one day’s truck drive from California and Seattle. Distribution was a good business for Springfield. Warehouse work provided good wages and provided good opportunities around the freeway. The City had asked the Metro Partnership and the State Economic Development Authority for their input, and both agencies reported they had many clients who were interested in locating in Oregon, and in the Eugene/Springfield metropolitan area in

particular, but there was not enough land available that met their needs. This moderate proposal would support jobs for our children in the future.

Commissioner Arkin would not support Action Item 2 based on assumptions that could not be supported. The predictions for economic growth were overstated and did not consider the availability of vacant, large industrial sites along I-5 and in Junction City, for which there was not a demand. There was currently a push from the State and federal government to reduce the transportation needed to move goods over longer distances and to site things closer to centers. She added the study did not adequately account for a majority of employment in the small business sector and for the growth of small farms. The study assigned too few jobs per acre and was not a good use of highly constrained land. The cost of developing large parcels of land, and extending City services to them was a questionable use of funds. A number of people who submitted comments pushed for creation of an urban renewal district, and this option had not been adequately explored.

Commissioner VanGordon supported Action Item 2. It would help meet the realistic economic needs of the City and the region. Springfield and Eugene were the economic power horse of Lane County. Having pro-growth policies and accepting the ECONorthwest needs forecast provided industry a chance to have access to sites that would make them competitive. The advantage of Eugene and Springfield was the proximity to the transportation corridor and the existing opportunities. If Springfield and Eugene did not have the needed 20 acre sites available, businesses would site in the smaller communities, and the region as a whole would pay the price through an additional demand on the transportation plan.

Commissioner Nichols did not see a need for 640 acres, but the addition of some larger sites was justified. The policy should encourage redevelopment.

Commissioner Sullivan would support Action Item 2. Although 640 acres initially sounded like a big number, it sounded more realistic when put in the context of 20 years and the context of the cost to support the development in terms of water, sewer, fire protection and other services. The Attorney General said the decision needed to be site based and not employee based.

Commissioner Kirschenmann would support Action Item 2, adding if you build it, they will come. He strongly supported redevelopment of existing sites, and thought the City was doing a good job to encourage redevelopment. The facts supported Action Item 2.

Commissioner Noble said if redevelopment was too expensive, there were no incentives, or there were barriers such as encroachment, noise or transportation, developers would not develop sites. He understood the City of Springfield initiated the current process because there was a lack of sufficient land to attract employers. It was important for any development to be thoughtful. I-5 would be a transportation corridor for many years beyond the 20 year period being examined. Although 640 acres seemed like a large number, Commissioner Noble would support Action Item 2.

Commissioner Beyer stated if there was no demand for the sites, they would remain undeveloped as open space.

Commissioner Moore appreciated everyone's comments and would support Action Item 2.

Commissioner Cross summarized the commissions' votes on Action Item 2. The Springfield Planning Commission supported Action Item 2 with a 7:0 vote, and the Lane County Planning Commission was split 3:5, with Commissioners Dignam, Noble and Sullivan supporting the item, and Commissioners Arkin, Goldstein, McCown, Nichols, and Siekiel-Zdzienicki opposing the item.

The Planning Commissions took a break from 7:15 p.m. to 7:30 p.m.

--Action Item 3: Urbanization Element and Springfield Urban Growth Boundary

Ms. Pauly directed commissioners to Questions 11 and 12.

In response to a question from Commissioner Arkin, Ms. Pauly explained the term “newly urbanizable” referred to new lands brought into the UGB. “Urban holding area” was a concept the City proposed so that newly urbanizable land brought into the UGB would be designated urban holding area. If the owner wished to urbanize, annex and develop that property, the owner would be required to go through a plan amendment process to amend the Metro Plan and the Springfield Refinement Plan.

Commissioner Arkin understood there was a staff proposal to designate an urban holding area that would prohibit parcels smaller than 10 acres.

In response to a question from Commissioner Beyer, Mr. Grile added the plan amendment process would not be a complete Goal 12 analysis but would satisfy Goal 14 criteria.

Commissioner Cross called for commissioners’ to state their support or opposition to Questions 11 and 12.

Commissioner Noble was unsure.

Commissioner Kirschenmann supported Questions 11 and 12 based on the information available information.

Commissioner Sullivan stated the findings in the record were clear and supported Questions 11 and 12.

Commissioner Nichols likely would support Questions 11 and 12.

Commissioner VanGordon supported Questions 11 and 12.

Commissioner Arkin was unsure whether she supported Questions 11 and 12.

Commissioner Beyer supported Questions 11 and 12.

Commissioner Dignam supported Questions 11 and 12.

Commissioner Moe supported Questions 11 and 12.

Commissioner Siekiel-Zdzienicki did not support Questions 11 and 12 based on issues he raised previously. He said although the Attorney General, DLCDC, and other legal people said it was not the commissions’ role to address employment density, he felt it did need to be addressed when dealing with constrained areas.

Commissioner Moore supported Questions 11 and 12 since the efficiency issues had been addressed.

Commissioner Goldstein supported Questions 11 and 12.

Commissioner Smith supported Questions 11 and 12.

Commissioner McCown supported Questions 11 and 12. He added the issue of employment density was an issue of whether or not it was legal, since it was clearly legal, but it was a policy issue.

Commissioner Beyer stated there was no legal way to deal with the employment density issue, noting businesses were either a permitted use or they were not. There were no government restrictions on the minimum number of employees.

Commissioner Cross asked those who were unsure of their support if there was a piece of information missing.

Commissioner Nichols said the documentation provided by the City seemed reasonable but she was not absolutely sure it was totally correct. She thought this was more of a City of Springfield issue than a Lane County issue.

Commissioner Noble recalled that the Department of Land Conservation and Development (DLCDC) representative provided a lengthy response to the Springfield code revisions and efficiency measures. Although the City Planning

Director's response had clarified most of the issues identified, there were a few unresolved issues. He felt the City would adequately address those unresolved issues.

Ms. Pauly directed commissioners to the concept maps, Map 6 (Priority 1 Lands for UGB Expansion), Map 7 (Springfield Land Use Concept 1), Map 9 (Springfield Land Use Concept 2) and Map 11 (Springfield Land Use Concept 3) distributed at this meeting. She stated ECONorthwest said Concept Maps 1, 2 and 3 met the intent of the law. Commissioners were asked to select a preferred concept.

Commissioner Sullivan stated Oregon Revised Statute (ORS) 197 referred frequently in the documentation provided to commissioners to prioritization. He said Seavey Loop appeared to be the only option with exceptions of approximately 70 acres. He opined Seavey Loop could not be considered if those exceptions were not considered.

Mr. Grile explained how the exception lands were identified on the maps. Those were the only areas the Board of County Commissioners (BCC) agreed were exception areas when the Comprehensive Plan was adopted. He averred the only way to bring 640 acres into the UGB was to actually bring in approximately 900 and 1150 acres of employment land due to the patchwork availability of land.

Commissioner Cross called for commissioners to state their support or opposition to Question 17, Concepts 1, 2 and 3.

Commissioner Noble stated based on the available information, the most logical choice was along the I-5 corridor that would be the North Gateway and Seavey Loop areas.

Commissioner Kirschenmann preferred Concept 1 based on transportation and geographic access purposes.

Commissioner Sullivan preferred Concept 3 because the land that would provide the best conditions to improve services were available in the north Springfield and Northgate while Seavey Loop was not a good candidate. However, it was important to work Seavey Loop into the process.

Commissioner Nichols preferred "Other". She liked the larger layout of Seavey Loop on Concept 1 less the northeast corner that was in the flood plain. She liked Concept 2 with the removal of the flood plain area.

Commissioner VanGordon preferred Concept 1 because it took advantage of the existing transportation system.

Commissioner Arkin preferred "Other". She could not support bringing in almost double the acreage needed, stating there was lack of a rationale for that theory and there was not a fact based need for double the acreage. She could support Concept 1, the North Gateway area, noting the farmland in the area was of a lesser quality than other potential sites. Area 3 north of 52nd Avenue was in the flood plain but she thought there could be a way to bring in some acreage that was close to the City limits. Area 9, Seavey Loop, contained the highest quality farmland, and did not supporting taking this area in

Commissioner Beyer opined there were not many choices. Area 3 north of 52nd Avenue had been under two to four feet of water two times during the last fifteen years. He had similar concerns with Area 8, south of the Millrace in Concept 1, noting part of it was on the hillside, part on an existing mining operation, part of it was within the Springfield Utility Board's (SUB) well fields and close to a school. He thought the only options were Area 1, North Gateway, and Area 9, Seavey Loop, since they were close to the freeway. Neither of them would be easy to serve.

Commissioner Moe preferred Concept 1 since it appeared to contain the most usable acreage.

Commissioner Moore preferred Concept 1, Area 1, North Gateway, as the most reasonable option, although it was located by the river. She added Area 8 south of the Millrace could be suitable for office employment.

Commissioner Goldstein preferred Concept 1 because it had the best balance and it provided good access.

Commissioner Smith preferred "Other". He liked Concept 1, but was concerned with encroaching on high quality farm land in Seavey Loop and providing services would be difficult. He did like the North Gateway use, using the limited

version, and taking in exceptions lands. He liked portions of Concept 3, and cutting back part of North 52nd Avenue due to flooding concerns.

Commissioner McCown was leaning towards Concept 1 because he was initially opposed to using the North 52nd Avenue. He liked the protection of farm lands and scaling back in Seavey Loop. There was already some manufacturing that was not clearly visible in the North 52nd Avenue area and there was good freeway access. He preferred to see the area north and west of North 52nd Avenue used.

Commissioner Dignam said Area 1, North Gateway, should be a top priority because it was close to the freeway and there was public testimony in the record that the farm land in that area was of poor quality. He saw Area 9, Seavey Loop, had freeway access, but poor access to services, and contained high value farm land. Area 3, North 52nd Avenue, had better access to services but had flood plain issues. He preferred Concept 1 since it included Areas 1 and 9. He stated the commissioners needed to accept the staff recommendation that the most efficient way to bring in 640 usable acres was to bring in 1,100 acres. He opined staff did their best to find the most efficient way to identify 640 acres.

Commissioner Siekiel-Zdzienicki would not choose any of the concepts since he disagreed with taking 640 acres.

Commissioner Nichols asked if there was a map available that identified suitable acres as well as explained why some acreage was unsuitable.

Commissioner Sullivan said he was comfortable moving from Concept 3 to Concept 1. The 640 acres was a reasonable number and he was not uncomfortable bringing in 1,000 acres to achieve that goal. It was important to move forward.

Commissioner Cross summarized the meeting, noting that the commissioners would finalize Option 3 at the next meeting with additional information from staff. Action on Option 2 would be tabled until the next meeting.

Commissioner Noble commended Planning Commissioners for this evening's progress. He suggested Lane County Planning Commissioners review the questions they had concerning Action Item 2 and bring those concerns to the next meeting.

Commissioner Cross suggested commissioners could forward their questions to staff via e-mail so they could be researched before the next meeting.

The meeting adjourned at 8:35 p.m.

(Recorded by Linda Henry)

MINUTES

Minutes approved by:
Springfield Planning Commission: 7/7/2010
Lane County Planning Commission:

JOINT WORK SESSION OF
SPRINGFIELD AND LANE COUNTY PLANNING COMMISSIONS
City Council Chambers
230 Fourth Street—Springfield

May 4, 2010
6:00 p.m.

SPRINGFIELD PLANNING COMMISSION: Frank Cross, Chair; Johnny Kirschenmann, Vice Chair; Lee Beyer, Eric Smith, Sheri Moore, Steve Moe, Sean VanGordon, members; Linda Pauly, Greg Mott, Bill Grill, Steve Hopkins, staff; Mary Bridget Smith, Bill Van Vactor, City Attorney.

LANE COUNTY PLANNING COMMISSION: Robert Noble, Chair; Tony McCown, Vice Chair; Lisa Arkin, Steve Dignam, George Goldstein, Nancy Nichols, Dennis Sandow, Joseph Siekiel-Zdzienicki, John Sullivan, members; Kent Howe, Matt Laird, Stephanie Schulz, staff.

Mr. Cross convened the meeting and welcomed everyone to the joint meeting of the City of Springfield and Lane County Planning Commissions.

1. BUSINESS FROM THE AUDIENCE

There was no business from the audience.

2. APPROVAL OF MINUTES—March 16 and April 20, 2010

March 16, 2010

There were no corrections to the March 16, 2010 minutes.

April 20, 2010

Mr. Sullivan offered the following corrections:

Page 7, paragraph 4, sentence 3 should read: He opined Seavey Loop could not be considered if those exceptions were not considered.

Page 8, paragraph 9, sentence 2 should read: Action Item 2 would be tabled until the next meeting.

Ms. Arkin offered the following corrections:

Page 3, paragraph 5, sentence 2 should read: She recalled that the redevelopment proposal for Glenwood as reviewed by the Lane County Planning Commission had been exciting, with an affordable housing component.

Mr. Beyer, seconded by Ms. Moore, moved to approve the March 16 and April 20, 2010 Springfield Planning Commission minutes as amended. The motion passed unanimously, 6:0.

Mr. McCown, seconded by Mr. Siekiel-Zdzienicki, moved to approve the March 16 and April 20, 2010 Lane County Planning Commission minutes as amended. The motion passed unanimously, 9:0.

3. **LEGISLATIVE PUBLIC HEARINGS—Continued meeting from April 20, 2010.**
- **Metro Plan Amendment, Springfield 2030 Refinement Plan LRP2009-00014;**
 - **Lane County PA 09-6018;**
 - **Springfield Development Code Amendments LRP2009-00015.**

Co-Adopters: The City of Springfield and Lane County

**Staff: Greg Mott and Linda Pauly, City of Springfield
Stephanie Schulz, Lane County**

Mr. Cross stated tonight's meeting was a continuation of the deliberation phase for the proposed Eugene/Springfield Metropolitan Area General Plan (Metro Plan) Amendment regarding the Springfield 2030 Refinement Plan LRP2009-00014, Lane County PA 09-6018, and Springfield Development Code Amendments LRP2009-00015. He explained the public testimony was closed on March 26, 2010 and no further information or evidence would be received this evening. The commissioners were tasked with considering the evidence before them and making the appropriate recommendations to the elected officials.

Mr. Cross opened the public hearing for the Springfield Planning Commission.

Mr. Noble opened the public hearing for the Lane County Planning Commission.

Mr. Cross reviewed the issues that the commissions would address this evening and the timeline for doing so.

Mr. Beyer remarked several e-mails had been sent to commissioners that raised interpretation questions of staff. He asked if staff could respond to those questions.

Mr. Mott said the City of Springfield prepared an analysis of the commercial and industrial buildable lands supply based on Goal 9 and the interpretative rule, which was applied to Goal 14 with respect to urban growth boundary (UGB) expansions. The City Council adopted a resolution that accepted the results of the commercial and industrial buildable lands analysis, which included an economic opportunities analysis and economic development strategies. A fundamental element was the conclusion that the City did not have enough opportunity sites for particular types of commercial and industrial activities, and it was necessary to go outside of the UGB to provide the needed lands. The action to adopt the resolution subject to public hearings and public comment as well as the State of Oregon's position. With few reservations regarding the State's comments which were primarily directed at nodal development, the State concluded the City had acted in compliance with Goal 9 and the interpretive rule, and the State had no substantive issues.

Mr. Mott said the premise of the Springfield 2030 Refinement Plan (refinement plan) was that the City would adopt a separate UGB for the City of Springfield. The evidence in the record that would direct the commissioners to take specific action related to the UGB included public testimony, documents provided primarily by the City's consultants, ECONorthwest and stakeholders. The conclusion was there was adequate residential land but there was not enough commercial and industrial land. He stated staff and commissioners could not predict what actions the elected officials would take on the proposals. It was important for the Planning Commissions to prepare an opinion about the suitability of the four proposed sites for expansion for commercial and industrial activities, based on the priorities iterated in the Oregon Revised Statutes (ORS). Each of the sites represented compliance with the evaluation process, and each had a variety of tax lot configurations and strengths. The sites were adjacent to the existing UGB. It was important that the commissioners feel comfortable with any action they took. Staff had put forth their best efforts to provide the commissioners with information to help with the decision making process.

Mr. Cross asked if the City Council had already decided on the elements, if there was any need for the commissions to further discuss Action Item 2, Economic Element.

Mr. Mott replied the council approved the element for use in this process, which was required for evaluation of potential UGB expansion areas. He noted the Planning Commissions were not policy makers and there were poli-

cies embedded in the studies that were recommended by citizen stakeholders during a 3 year period that were accepted by the City Council as an acknowledgement of compliance with the law.

Mr. Mott concurred with Mr. Beyer that the commissioners' task was solely to opine on the recommendations for expansion on the four identified sites. Mr. Mott added the normal process for a Planning Commission in an advisory role was to forward supportable recommendations to elected officials.

Mr. Dignam agreed with Mr. Mott with the exception of the statement that the Planning Commissions were not policy makers. Mr. Dignam agreed the commissions were not decision makers, but he believed part of the Planning Commissions' task was to help advise the Board of County Commissioners (BCC) on policy matters.

Mr. Mott asserted the commissions could forward recommendations to the elected officials regarding policies. However, those recommendations had no material affect on the effort to also tell elected officials if they expanded the UGB, the identified sites complied with the law. However, the commissions did not have the authority to remove a policy and replace it with another.

Mr. VanGordon arrived at 6:28 p.m.

Ms. Arkin agreed with Mr. Dignam. She believed the commissioners' job was to consider the whole record and all of the evidence it contained. Where a policy was not clear, or did not support certain conclusions, it was the commissioners' job to consider inadequacies in proposed policies and make advisory recommendations to the decision makers.

Mr. Mott iterated the distinction between the assumptions and policies embedded in the Metro Plan and Refinement Plan was what was moving the process forward. Commissioners were entitled to disagree with the policy, but it was not their role to replace a policy with a policy of their own.

Mr. Cross asked if there was any point in going back to Action Item 2. He noted all but four commissioners were satisfied that the proposed economic objectives and strategies referred to in Goal 9 in the Metro Plan.

Mr. McCown thought Mr. Beyer had addressed the issue when he raised the e-mails to which staff had responded. He acknowledged there were only four objections, but those four were Lane County Planning Commissioners, which could change the recommendation to the BCC, while the recommendation from the Springfield Planning Commission may be to support the recommendation.

Mr. Mott was not in complete agreement with the content of either of the e-mails. He did not agree with any of the assertions that suggested the information he provided was inaccurate. The City's consultant would have to provide information regarding the tables in the CIBL document that provided different information.

Mr. Sullivan said he did not read the e-mails he received after the record was closed. He respected both authors because he found their comments insightful in previous testimony and they were an important part of the record. He thought it inappropriate for commissioners to discuss the e-mails in question because the record was closed.

Ms. Smith said a couple of e-mails had been sent to all commissioners after the record was closed. She conducted a poll of commissioners to determine who had received and read the e-mails, which indicated several commissioners had read the e-mails. Upon a review by the City Attorney's office, it was determined the record was closed. However, another procedure with the joint elected officials would allow the record to be reopened. People were welcome to put information in the record at that time. The City Attorney's office concluded this was a legislative rather than a quasi-judicial hearing. In the context of the bigger picture, it would be prudent to have a response to the e-mails in the event any commissioners had read or wanted to read and discuss them. Since many of the commissioners had not read the e-mails, Ms. Smith suggested that the commissioners should not consider the e-mails, but consider the record before the commissions as a whole, and move forward with the process.

Mr. McCown said the questions in the March 14, 2010 letter and subsequent responses by staff mirrored the questions in the e-mail. He thought it may be appropriate for those questions to be forwarded to the consultants for a response after which they should be forwarded to the elected officials.

Mr. Sullivan concurred the commissioners should not consider information received, including the e-mails, after the record was closed.

Mr. Noble said it appeared not all issues had been resolved to the satisfaction of all of the County commissioners and suggested revisiting those issues since all nine commissioners were present this evening.

Mr. Cross suggested revisiting Action Item 2, Economic Elements, questions 5, 6, 8, 9 and 10, after which the commissioners could concentrate on reviewing maps and concepts.

Mr. Siekiel-Zdzienicki said having a discussion of the maps would help to make a decision on Action Item 2.

Mr. Noble polled Lane County Planning Commissioners on those favoring moving to discussion of the areas and evaluating the maps. Commissioners Arkin, Dignam, Nichols, Noble, Sandow and Mr. Siekiel-Zdzienicki responded affirmatively.

Mr. Cross noted consensus on the part of the Springfield Planning Commission to review the maps.

Commissioners reviewed the maps and asked questions of staff from 6:45 p.m. to 7:20 p.m.

Mr. Noble called for a show of hands of Lane County Planning Commissioners of those who wished to move on to Action Item 3, Urbanization Element and Springfield Urban Growth Boundary. There was unanimous consent, 9:0, to move on to Action Item 3.

Mr. Cross asked Springfield Planning Commissioners if there were objections to moving on to Action Item 3, Urbanization Element and Springfield Urban Growth Boundary. There was unanimous consent, 6:0, to move on to Action Item 3.

Mr. Cross clarified the commissions had ended the April 20, 2010 discussion at Action Item 3, Question 17, selection of a concept area. At the April 20 meeting, 50 percent of those polled agreed with Concept 1, and 50 percent looked at another concept that was a hybrid of several areas. He suggested polling commissioners on each of the concepts to eliminate the unwanted concepts and selecting or designing one that suited commissioners.

Ms. Pauley reviewed Concept 1, which consisted of Area 1, North Gateway; Area 8, South of Millrace; Area 9, Seavey Loop.

Mr. Noble said while he could not support Concept 1 completely, he could consider supporting the concept if protections were provided for Areas 1 and 9.

Mr. Mott explained the prioritization requirements of Goal 14 could not be dismissed. Unsuitable land could be a higher priority for inclusion in the UGB than suitable land elsewhere because of circumstances related to Goal 14. There were some uses of unsuitable land that supported an urban use in the area that could not be accomplished if the unsuitable land was outside of the UGB. Bringing unsuitable land into the UGB did not mean it would be used for typical urban development such as buildings, but it could be used for a required open space component for adjoining development such as riparian restoration or stormwater management. He opined there was not a perfect solution available.

Mr. Noble called for a show of hands of those who supported each concept totally.

Concept 1 support:

Lane County Planning Commission: Arkins, Dignam, Sullivan.

Springfield Planning Commission: Kirschenmann, VanGordon.

Ms. Pauley reviewed Concept 2, which consisted of Area 3, north of 52nd Avenue; Area 8, South of Millrace; Area 9, Seavey Loop.

Concept 2 support:

Lane County Planning Commission: no support

Springfield Planning Commission: no support

Ms. Pauley reviewed Concept 3, which consisted of Area 1, North Gateway; Area 3, North of 52nd Avenue; Area 9, Seavey Loop.

Concept 3 support:

Lane County Planning Commission: Dignam, Goldstein.

Springfield Planning Commission: no support

Mr. Cross noted Concept 2 had no support and was definitely out of consideration.

Mr. Cross called for a show of hands for those who supported combining Concepts 1 and 3 to create a desired outcome.

Combined Concept 1 and 3 support:

Lane County Planning Commission: Dignam, Goldstein, McCown, Nichols, Sullivan.

Springfield Planning Commission: Beyer, Kirschenmann, Moe, Moore, Smith, VanGordon.

Mr. Cross asked who preferred only a modification to Concept 1.

Modified Concept 1 support:

Lane County Planning Commission: Noble, Nichols.

Springfield Planning Commission: Beyer.

Mr. Sullivan called a point of order. He stated the commissioners could make recommendations to the BCC related to the benefits of a concept, or benefits of combining concepts, but they were not qualified to determine what properties should or should not be included.

Mr. Noble disagreed with Mr. Sullivan. He said modifying or taking parts of Concept 1, Area 1 and Area 9, would be suitable to him.

Mr. Sullivan agreed to see where Mr. Noble's suggestion led the group.

Ms. Moore asked if a number lower than 640 acres could be achieved if Concept 1 was modified to include Area 1 and Area 9, and Area 8 was removed.

Mr. Grile said the factual base indicated a shortfall of 640 acres. In order to support a conclusion of less than 640 acres, the analysis would need to be modified to conclude that a smaller number was needed. Another option would be to agree there was an established need of 640 acres that would be phased in over time.

Mr. Beyer asked if such an action would be consistent with the statutory requirement.

Mr. Van Vactor stated it would be necessary to provide an explanation of what steps the City would take to address the statutory requirement.

Mr. Beyer said the acreage requirements were not based strictly on raw acreage, but the need to have a number of sites that were 20 acres or larger.

Ms. Pauley directed commissioners to page 5 of the May 4, 2010 memorandum from Bob Parker, ECONorthwest to Greg Mott, regarding Table 4, which summarized the suitability evaluation of the four study areas, Areas 1, 3, 8 and 9.

Ms. Arkin said when addressing the issue of obtaining large sites, it appeared the high end of the range was used in developing the need and she had not seen a range of acreages identified.

Mr. Grile replied the analysis described the needed acreage for 20 years, with the need for several 50 acre sites identified, and acknowledgement that a significant portion of the total need identified 5 acre sites for redevelopment inside the existing UGB.

Mr. Sullivan said it appeared Option 1 and Option 3 had eleven commissioners who were in consensus that there were good aspects to both options. If this was the case it was not necessary to develop a specific recommendation to the elected officials. It was the responsibility of the commissioners to identify strengths and weaknesses within a common ground. He said wetlands most likely were present in some of the identified areas, and he thought the BCC might be pleased to have the wetlands within the City's UGB because they may assume there would be better stewardship. Conversely, he also thought the BCC may not want to have the wetlands within the City's UGB because the BCC may feel that the County could be more diligent on the stewardship, since development could not occur on wetlands outside of the UGB. This was a decision for the elected officials to make because there were political ramifications involved.

Mr. Siekiel-Zdzienicki had concerns with large sites and employment density. ECONorthwest had identified large sites for industrial parks that were subdividable, and owned by multiple developers, thus destroying the concept of one large site. He stated use of large, 50 acres sites for warehouses was not good use of the land due to the geographic constraints the City faced.

Mr. VanGordon suggested the commissioners had reached consensus on some version of Areas 1 and 9. He added 315 of the needed 640 acres had been identified, and the discussion should be directed to how much of Seavey Loop or other areas should be included. He opined there was agreement that North Gateway should be included in whatever concept the commissioners decided upon.

Mr. Cross called for a show of hands of those who supported moving forward to develop a recommendation based on the opinions of commissioners and agreements that could be identified.

Lane County Planning Commission: Arkin, Dignam, Goldstein, McCown, Nichols, Noble, Sandow, Sullivan.

Springfield Planning Commission: Beyer, Cross, Kirschenmann, Moore, Smith, VanGordon.

Mr. Noble was frustrated because he was unable to visit the sites, noting there was something to be learned if all commissioners could visit the sites together. He thought it ridiculous that the commissioners did not put their feet on the ground in areas for which recommendations and decisions were being made. He supported the North Gateway area with the exception of the floodway adjacent to the river. The BCC could determine whether or not it should be included in the UGB. He did not support use of the floodway for other types of development since it was in relatively primitive condition. He said the North Gateway area had been identified as having suitable properties for most of the building types in the UGB, based upon the alternatives analysis requirements. In some areas, the resource agriculture land was of mixed condition. The North Gateway area was adjacent to the I-5 transportation corridor.

Mr. Noble could support parts of Area 9, as somewhat suitable for most of the development types identified. A problem with the area was a number of the lots were small. It would be important to protect the large sites for commercial or industrial development, and not divide them into small parcels. He said use of Areas 3 or 8 were problematic because Area 3 was prone to floods, and Area 8 was the source of drinking water.

Mr. Moe supported Areas 1 and 9, but he thought what the commissioners decided tonight would be irrelevant before the elected officials.

Ms. Arkin said use of exception areas first was required by ORS, and there were sections in Areas 1 and 9 that met that requirement. There were portions in Area 9 that were under power lines and along the I-5 corridor that could provide smart land uses. In Concept 1, Area 1, 350 acres had been identified of which 250 acres, or 78 percent, were able to be developed. In Area 9, 500 acres had been identified, of which 350 acres, or 47 percent, were able to be developed, which offered a less efficient use of the land than Area 1. Under Concept 3, North Gateway

had 78 percent of usable land, while it dropped to 35 percent in Seavey Loop. Use of only 35 percent indicated that too much land was being brought into the urban holding area. There was no guarantee that the land would be protected although much of it consisted of riparian and floodplain areas. The land outside of the UGB was Lane County land with a current use of natural resources, which was as valid a use of the land as designating it for industrial uses. There was a lack of consistency by City staff regarding what could and could not be developed in the flood plain. She observed Area 8, was close to the Springfield well fields and she was concerned uses would be introduced that would contaminate the well fields. She stated identifying large lots of 50 acres was arbitrary. She expressed concern that the large lots could be subdivided, and questioned whether 640 acres was a valid number. She was impressed with the quality of the soil, noting most of it was class 2. She was pained to think of parking lots and warehouses on class 2 soil. Future generations would need the land to grow food.

Mr. Beyer averred there were no good options. Area 3 was under water regularly and Area 8 was near the well field. The City Council was trying to get trucks off of Main Street, making Area 8 challenging for industrial uses. Areas 1 and 9 offered major advantages that they were close to I-5 and would provide better access for commercial vehicles. The biggest issue for the City Council would be to determine how to protect large sites from being subdivided into small parcels. He was skeptical about bringing in all of the non-usable land. He suggested if the large sites and Goal 5 areas were protected, regardless of whether they were inside or outside of the City, they would look the same in 20 years. The City of Springfield and City of Eugene policies were more protective of the lands than were Lane County's due to available resources.

Mr. Sandow saw some value in Areas 1 and 9, but had a concern related to employment density. He could find no discussion around the assumption of what would happen to per capita wages. Wages in Oregon wages had been dropping for over 15 years and were at a 16 year low in 2009. There was a relationship between per capita wage and the amount of land needed. Although there was no legal requirement for the Planning Commission to make decisions based on wage levels, he saw this as an efficiency issue. It was difficult to make a decision on lands that could be used for agricultural purposes, although they may be class 2 soils, without being careful with assumptions. This represented a fundamental flaw.

Mr. Kirschenmann concurred with Mr. Beyer that there was not one good concept. He hoped the elected officials would look at Areas 1, 3, 8 and 9. He opined the City could look at sites within the four areas, while protecting farm lands in Area 9; using some of Area 8, being cognizant of the water fields; and, Area 3 could be used to avoid wetlands. Portions of all four areas could be used to fill the City's needs.

Ms. Nichols said the most logical sites included sections of Areas 1 and 9. She was concerned with including floodways since they could be developed under certain circumstances. She preferred that the floodways remain in the County and be restricted except as needed for utilities. She thought counting small parcels as constrained artificially lowered the suitable acres. She thought that northeast corner of Seavey Loop Area 9 was in the floodway and should not be considered. She was concerned with finding a way to preserve large parcels.

Mr. VanGordon noted there was quite a bit of agreement among the commissioners. He supported using Area 1, but was concerned with flooding issues related to Area 3, and urged caution. Additionally, he supported taking a larger piece of Area 9, noting the law required taking 93 acres of the site. It would be more cost effective to use available infrastructure. He commented floodway issues would be raised by the elected officials. He wanted to ensure Springfield had a continuous set of land and UGB that would make sense. It made sense to have everything in North Gateway. He believed the City of Springfield could be a good steward of the land. Conversely, Area 9 needed to be examined for floodway issues.

Mr. Smith supported the Area 1 in its entirety; a reduced section of Area 9 being aware of soil issues in the area; and a portion of Area 3. He encouraged elected officials to consider the east side of Seavey Loop. He said elected officials could look at the suitable versus unsuitable lands Question It was important to be efficient with the land.

Mr. Sullivan directed his comments to the BCC rather than the Springfield City Council. Lands suitable for employment must be part of the expansion decision. He supported expansion as close as reasonable to I-5 to reduce surface street transit and the potential to have to move rail. Option 1 made the most sense although North Gateway and Seavey Loop would be a challenge to service. He noted there was testimony in the record which needed

further exploration that there was available in the Seavey Loop area. He questioned the concerns about the fire district capability to the Seavey Loop area, noting Lane Community College contracted with a local fire protection district. The elected officials needed to determine what lands the BCC must protect as stewards. He asked if they could they do a better job of stewardship than the City of Springfield. He encouraged the BCC to read the dialogue from the public and to responses to the issues. He found the written testimony intriguing and insightful. He noted the process had been lengthy but had gone a long way to reinforce the applicants' desires to bring the issues forward and reinforce the focus on those who have opposition on the process.

Ms. Moore agreed with Mr. Noble that feet on the ground would be beneficial and recommended that the elected officials visit the various sites. She understood there were water resources in Area 8, but also understood there were wells throughout the City that were protected. She noted of the 140 acres identified in Area 8, 130 acres were deemed to be suitable. She supported Concept 1 in its entirety, although she agreed that Area 3 perhaps offered better accessibility to I-5 and should be considered.

Mr. Dignam said Areas 3 and 8 were bad alternatives, and Areas 1 and 9 were better alternatives. Areas 1 and 9 were better because they included exception areas and freeway frontage, which was ideal for commercial and industrial development. He thought it would be possible to find pieces from Areas 3 and 8. He did not understand why bringing in excess acres was a bad thing. Staff provided detail on the rationale and benefits of doing so. He asserted no one would build on lands with undesirable features such steep slopes. He disputed the assumption that lands would be built on as soon as they were brought into the UGB. He concurred that it was desirable to protect valuable farm land, noting class 2 soil was important. It was also important to find a place for humans, and that was what this exercise was all about.

Mr. Goldstein mourned the loss of farmland but it seemed there was no way to get around it. He was concerned with access to the highway. It would have been helpful if the proposals had been split into heavy and light industrial use, which would make taking land near the highway more amenable to commissioners. He had not seen that the construction of the roads had been studied, and it would be the City of Springfield's burden to pay for roads for large vehicles. He encouraged keeping development close to I-5.

Mr. McCown noted there was general consensus that Areas 1 and 9 were the best suited sites and the elected officials would need to look at Areas 3 and 8 to reach 640 acres if that was the decided upon acreage. He hoped the staff and consultants could develop satisfactory responses to the questions raised through this process.

Mr. Siekiel-Zdzienicki said constrained lands could always be brought into the UGB and he saw no reason to bring them in at the present time. He saw only 200 available unconstrained acres in Area 1, along with some land along Franklin Boulevard, Seavey Loop, and Highway 58, but he did not think there was sufficient land available to reach a target of 640 acres.

Mr. Cross agreed that the City should focus on the Area 1 and much of Area 9, with the balance brought in from Area 3, primarily due to accessibility. Area 8 should not be considered due to accessibility issues. He saw no issue with bringing in unsuitable land, opining the City could be a good steward of the land. Bringing in unsuitable land would provide consistency in the development of the UGB and provide open space when other parcels were developed.

Mr. Cross noted consensus to use Area 1, and Area 9. There was some interest in parceling Area 9 and parts of Area 3.

Mr. Beyer said a cornerstone of local planning was that smaller developments would occur on existing lots of which there were many. There were no easily accessible large parcels in Oregon that appealed to larger businesses.

Mr. Noble did a time check. There was consensus to try to finish the review this evening. There were no objections if Mr. Goldstein had to leave early.

The Planning Commissions took a short break at 8:45 p.m.

Mr. Goldstein left at 8:45 p.m.

Ms. Pauley reviewed and facilitated a discussion of Question 18, *is the City's proposal to designate "newly urbanizable" area added to the UGB as Urban Holding Areas that require a post acknowledge plan amendment (PAPA) process required to remove UHA and allow designation for urban development supportable?*

Mr. Beyer supported protecting large parcels. However, the language in Question 18 suggested it would be impossible to develop large parcels because it would take developers months if not years to work through a plan amendment.

Ms. Pauley stated the City could undertake the plan amendment process rather than require it of potential developers.

Mr. Grile said Goal 14 required a comparative analysis of the public facilities and transportation system, although there was some question about that based on a recent Goal 12 decision out of Eugene. However, the City was not addressing Goal 12 at the level of detail required for a transportation system plan. The significant goal that needed to be addressed for annexing and developing the land would be Goal 12.

In response to a question from Mr. Dignam, Mr. Grile said if the commissioners said no to Questions 18 and 20 the Springfield Planning Commission would have to plan and zone each parcel. He concurred with Ms. Moore that by proceeding with the holding plan, planning and zoning would be deferred to the applicant or to the City, in a manner similar to the commission's work with a citizen advisory committee that was preparing a detailed plan for Glenwood.

Mr. Cross called for a show of hands on Question 18.

Lane County Planning Commission: Commissioners Dignam, McCown, Nichols, Noble, and Sullivan voted in favor, and Commissioners Arkin, Sandow, and Mr. Siekiel-Zdzienicki voted against.

Springfield Planning Commission: Unanimously supported Question 18, 7:0

Mr. Moe left at 8:57 p.m.

Ms. Pauley reviewed and facilitated a discussion of Question 19, *Shall all master plans for urban development on "newly urbanizable" lands require that development of such lands is consistent with the Urban Holding Area designations for such lands and with the site needs criteria for their inclusion in the UGB as expressed in the applicable Economic Opportunities Analysis, Residential Lands Analysis, UGB Alternatives Analysis, and related findings adopted in support of their inclusion?*

There was consensus that this was strictly a City of Springfield issue on which the Lane County Planning Commission would not vote.

Following a brief discussion related to lot sizes, commissioners agreed with Mr. Grile's suggestion that the commission defer addressing that issue until staff could provide more information to the City of Springfield Planning Commission.

Mr. Cross called for a show of hands on Question 19.

Springfield Planning Commission: Unanimously supported Question 19, 6:0.

Ms. Pauley reviewed and facilitated a discussion of Question 20, *is the City's proposal to preserve large "newly urbanizable" sites supportable?"*

Mr. Noble said there was no need for the Lane County Planning Commission to vote on Question 20.

Mr. Cross called for a show of hands on Question 20.

Springfield Planning Commission: Unanimously supported Question 20, 6:0.

Action Item 4: Land Use and Urban Design Element

Ms. Pauley reviewed and facilitated a discussion of Question 23, *Establish parcel-specific diagram?*

In response to a Question from Mr. Noble, Mr. Howe said the County would always be supportive of a site specific plan designation, which was already the County's practice. There was no need for the Lane County Planning Commission to vote on Question 23.

Mr. Cross called for a show of hands on Question 23.

Springfield Planning Commission: Unanimously supported Question 23, 6:0.

Ms. Pauley reviewed and facilitated a discussion of Question 24, *Prepare findings to support and incorporate re-designations to resolve plan-zone conflict where feasible?*

Mr. Cross called for a show of hands on Question 24.

Springfield Planning Commission: Unanimously supported Question 24, 6:0.

Ms. Pauley directed commissioners to Attachment 1-17, Issue 2, Adopt amendments to the Springfield Development Code to Implement Land Use Efficiency Measures—Phase one (LRP 2009-00015/PA 09-6018), that would:

- Create a Small Lot Residential District;
- Establish a minimum density of six dwelling units per net acre in the LDR District;
- Require a mix of housing types in the SLR developments.

Action Item 1: Adopt Springfield Development Code Amendments.

Mr. Beyer, seconded by Mr. Smith, moved that the Springfield Planning Commission recommend adoption of the Springfield Development Code Amendments Land Use Efficiency Measures-Phase 1. The motion passed unanimously, 6:0.

Mr. Noble said there was no need for the Lane County Planning Commission to vote on this motion.

Mr. Beyer, seconded by Mr. Kirschenmann, moved to recommend the elected officials adopt a parcel specific plan diagram. The motion passed unanimously, 6:0.

Mr. Noble said there was no need for the Lane County Planning Commission to vote on this motion.

Mr. Beyer, seconded by Mr. Kirschenmann, moved to recommend the elected officials consider resolving plan zone conflicts. The motion passed unanimously, 6:0.

Mr. Noble said there was no need for the Lane County Planning Commission to vote on this motion.

Mr. Beyer, seconded by Mr. Kirschenmann, moved to recommend the elected officials adopt the Springfield 2030 Refinement Plan including establishing a separate Urban Growth Boundary for the City of Springfield. The motion passed unanimously, 6:0.

Ms. Arkin, seconded by Mr. McCown, moved to recommend the elected officials adopt the Springfield 2030 Refinement Plan including establishing a separate Urban Growth Boundary for the City of Springfield. The motion passed unanimously, 8:0.

Mr. McCown, seconded by Ms. Nichols, moved to advance the Springfield 2030 Refinement Plan forward to the BCC without a recommendation for specific areas for the UGB expansion and for the Board to review the Planning Commission deliberations to understand the Planning Commission concerns.

Mr. McCown explained he had concerns about issues that had been raised by the commissioners. He stated if staff and the consultants could clarify the issues of alleged inconsistencies and assumptions, the BCC could possibly agree to those issues. It was difficult for him to agree to expand the UGB while there were still big issues related to the total acreage.

Mr. Dignam could support the motion since there was a divergence of opinion.

Mr. Siekiel-Zdzienicki supported the motion because staff would now be able to present new evidence when the record reopened and the issues raised by the commissioners could be discussed by the BCC.

Ms. Arkin supported the motion because the commissioners were not policy makers but advisory to the BCC. The BCC would be able to make a decision based on the evidence in the record and the comments offered by the Planning Commissions.

The motion passed unanimously, 8:0.

Mr. Sullivan, seconded by Mr. Dignam, moved that Lane County Planning Commission recommend that prior to initiation of the process by the BCC, comments made by individuals regarding options and larger maps, be presented at the beginning of the process; and that a workshop be conducted to streamline the process.

Ms. Arkin would support the motion. She asked if chair or vice chair would ask if the BCC would like to have a joint meeting with the Lane County Planning Commission.

Mr. Dignam had no interest in discussing the issue further.

The motion passed unanimously, 8:0.

The meeting adjourned at 9:25 p.m.

(Recorded by Linda Henry)

BEFORE THE PLANNING COMMISSION OF SPRINGFIELD, OREGON
ORDER AND RECOMMENDATION FOR:

AMENDMENTS TO THE SPRINGFIELD DEVELOPMENT CODE TO: ESTABLISH THE AGRICULTURAL (AG)] TYP413-00007
ZONING DISTRICT (SUBSECTIONS 3.2-900 THROUGH 3.2-920); REVISE THE CURRENT PUBLIC LAND]
AND OPEN SPACE (PLO) ZONING DISTRICT (SUBSECTIONS 3.2-700 THROUGH 3.2-715); REVISE PUBLIC]
AND PRIVATE PARK SPECIAL USE STANDARDS (SUBSECTIONS 4.7-200 AND 4.7-203); AND ADDING/]
AMENDING TERMS RELATED TO THE ABOVE (SUBSECTION 6.1-110)]

NATURE OF THE PROPOSAL

Staff is requesting that the Springfield Planning Commission forward a recommendation of approval to the Springfield City Council and the Lane County Board of Commissioners regarding the following proposed amendments to the Springfield Development Code:

- The proposed AG Zoning District (SDC 3.2-900 et. Seq.) will implement the Springfield 2030 Refinement Plan Economic and Urbanization Element policies that the City, in cooperation with Lane County, is scheduled to adopt in early 2014 to comply with Statewide Planning Goals 9, Economic Development and 14, Urbanization. Compliance means that Springfield must demonstrate that it has applied the appropriate designation and zoning to proposed UGB expansion areas to ensure that permitted "interim" uses will not preclude use of these sites for future intended employment purposes. The proposed AG Zoning District permitted uses will be allowed until urban employment development is planned and the land is annexed to Springfield. At that time, an appropriate "permanent" Springfield employment designation and zoning will be applied.
- Proposed Amendments to the PLO Zoning District (SDC 3.2-700 et. Seq.). The proposed South Millrace UGB expansion areas contains a number of sites owned and utilized by the WPRD, SUB and the City, some of which are zoned PLO. Upon staff review, it was found that the current PLO use list that was first prepared in the mid 1980's is not adequate to address Willamalane's and SUB's current and future development needs. However, the proposed amendments will apply to all properties zoned PLO within Springfield's UGB.
- Revise the Public and Private Park Special Use Standards (SDC 4.7-200 and 4.7-203)
- Amend/Add definitions in SDC 6.1-110 related to the above.

Timely and sufficient notice of the public hearing has been provided, pursuant to SDC Section 5.2-115.

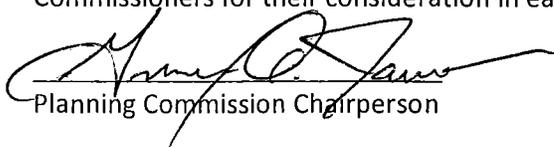
On November 19, 2013, the Springfield Planning Commission held a work session and on December 18, 2013, a public hearing on the proposed SDC amendments. The staff report and written comments were entered into the record.

CONCLUSION

On the basis of this record, the proposed amendments are consistent with the criteria of SDC Section 5.6-115A.-C. This general finding is supported by the specific findings of fact and conclusion in the Staff Report and Findings and the additional information submitted for the December 18, 2013 public hearing.

ORDER/RECOMMENDATION

It is ORDERED by the Springfield Planning Commission that approval of Case Number TYP413-00007 be GRANTED and a RECOMMENDATION for approval be forwarded to the Springfield City Council and the Lane County Board of Commissioners for their consideration in early 2014.


Planning Commission Chairperson

12/18/13
Date

- ATTEST
- AYES:
- NOES:
- ABSENT:
- ABSTAIN:

ORDINANCE NO. _____

AN ORDINANCE AMENDING THE SPRINGFIELD URBAN GROWTH BOUNDARY; THE EUGENE-SPRINGFIELD METROPOLITAN AREA GENERAL PLAN (METRO PLAN) TEXT AND DIAGRAM TO AMEND THE METRO PLAN BOUNDARY, ADOPT THE SPRINGFIELD 2030 COMPREHENSIVE PLAN (2030 PLAN) ECONOMIC AND URBANIZATION POLICY ELEMENTS AND ASSIGN PLAN DESIGNATIONS TO NEWLY URBANIZABLE LANDS; THE SPRINGFIELD ZONING MAP TO ASSIGN NEW ZONING; THE SPRINGFIELD DEVELOPMENT CODE TO ADD SECTIONS 3.2-915 – 3.2-930 ESTABLISHING THE AGRICULTURE-URBAN HOLDING AREA LAND USE ZONING DISTRICT (AG); ADOPTING A SEVERABILITY CLAUSE; AND PROVIDING AN EFFECTIVE DATE

THE CITY COUNCIL OF THE CITY OF SPRINGFIELD FINDS THAT:

WHEREAS, the City of Springfield and Lane County adopted a coordinated population forecast (City of Springfield Ordinance No. 6248 on October 19, 2009; Lane County Ordinance No. PA-1261 on October 28, 2009) that estimated the City of Springfield's population including the Metro Urban Area East of Interstate 5 to be 81,608 in 2030; and

WHEREAS, the City of Springfield and Lane County adopted a separate Springfield Urban Growth Boundary (City of Springfield Ordinance No. 6268 on June 20, 2011; Lane County Ordinance PA-096018 on July 6, 2011); and

WHEREAS, the City of Springfield and Lane County adopted an amendment to the Metro Plan Diagram to reflect a new Metro Plan Boundary that is coterminous with the City of Springfield Urban Growth Boundary east of Interstate 5 (City of Springfield Ordinance No. 6288 on March 18, 2013; Lane County Ordinance No. PA-1281 on June 4, 2013); and

WHEREAS, the City of Springfield, Lane County and the City of Eugene adopted amendments to the *Metro Plan* that provide a process for amending the *Metro Plan* to allow each city to determine the extent to which particular sections in the *Metro Plan* will apply to an individual City, as each jurisdiction establishes its own Urban Growth Boundary, 20-year land supply and city-specific comprehensive plan (City of Springfield Ordinance No. 6332 on December 1, 2014; Lane County Ordinance No. PA 1313 on November 12, 2014; and City of Eugene Ordinance No. 20545 on November 25, 2014); and

WHEREAS, the City of Springfield commissioned ECONorthwest to prepare the Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis outlining Springfield's employment needs for the next 20-year planning period ending in 2030, attached as Exhibit B-2; and

WHEREAS, the Springfield Commercial and Industrial Buildable Lands Inventory, Economic Opportunities Analysis and Economic Development Objectives and Implementation Strategies determined that the City of Springfield has a deficit of industrial and commercial mixed-use employment sites larger than 5 acres and that deficit requires an expansion of the Urban

Growth Boundary of 223 suitable acres to accommodate the employment needs for the 20-year planning period ending 2030; and

WHEREAS, the acknowledged 2011 Springfield Residential Land & Housing Needs Analysis determined that Springfield had a deficit of 300 acres of public/semi-public land to meet Parks and Open Space needs for the 20-year planning period ending 2030; and

WHEREAS, timely and sufficient notice of the public hearings, pursuant to Springfield Development Code Section 5.2-115, has been provided; and

WHEREAS, the Springfield and Lane County Planning Commissions conducted joint public hearings on the Metro Plan and 2030 Plan amendments on February 17, 2010 March 16, 2010 and May 4, 2010 and forwarded recommendations to the Springfield City Council and Lane County Board of Commissioners; and

WHEREAS, the Springfield Planning Commission conducted a public hearing on December 18, 2013 and forwarded recommendations to both the Springfield City Council and Lane County Board of Commissioners on the proposed AG Land Use Zoning District and; and

WHEREAS, the Springfield City Council and Lane County Board of Commissioners held joint public hearings on these amendments on September 12, 2016 and XX,; and is now ready to take action based on the above recommendations and evidence and testimony already in the record as well as the evidence and testimony presented at the joint elected official's public hearing; and

WHEREAS, the City of Springfield provided several opportunities for public involvement including but not limited to open houses, citizen advisory committees and technical advisory committees; and

WHEREAS, substantial evidence exists within the record demonstrating that the proposal meets the requirements of the *Metro Plan*, Springfield Development Code and applicable state and local law as described in the findings attached as Exhibit F, and which are adopted in support of this Ordinance.

NOW THEREFORE, THE COMMON COUNCIL OF THE CITY OF SPRINGFIELD ORDAINS AS FOLLOWS:

Section 1. The Springfield Urban Growth Boundary is amended to satisfy Springfield's established need by adding 257 acres of suitable employment land on 273 gross acres in the North Gateway and Mill Race expansion areas, designating 53 acres of land located within the FEMA Floodway in the North Gateway expansion area as Natural Resource and also expanding the Springfield Urban Growth Boundary to include 455 acres of existing Public, Parks and Open Space Land as depicted in Exhibits A-2, C-1, and C-2 attached hereto and incorporated by this reference.

Section 2. The *Metro Plan* text and diagram are hereby amended to adopt the "Urban Holding Area- Employment" (UHA-E) Plan Designation and to assign the UHA- E plan designation to 273 of acres of land; to assign the "Public/Semi Public" plan designation to 455 acres of land; and to

assign the "Natural Resource" plan designation to the 53 acres of land located in the FEMA Floodway in the North Gateway expansion area as Natural Resource and as set out in Exhibit A-2 and D attached hereto and incorporated by this reference.

Section 3. Pursuant to Statewide Planning Goal 9, the *Metro Plan* is amended to adopt Springfield's city-specific *Springfield 2030 Comprehensive Plan Economic Element* including Economic Development Goals, Policies and Implementation Strategies as well as its Technical Supplement the *Springfield Commercial and Industrial Buildable Lands Inventory, Economic Opportunities Analysis*, which will replace the Springfield Commercial Lands Study, as set out in Exhibit B, attached hereto and incorporated by this reference.

Section 4. Pursuant to Statewide Planning Goal 14, the *Metro Plan* is amended to adopt Springfield's city-specific *Springfield 2030 Comprehensive Plan Urbanization Element* including Urbanization Goals, Policies and Implementation Strategies as set out in Exhibit C, attached hereto and incorporated here by this reference.

Section 5. The *Metro Plan* text is amended in Chapter II, Section C: Growth Management; Chapter II, Section E: Urban and Urbanizable Land; Chapter III, Section B: Economic Element reflecting that these sections no longer apply to Springfield and have been replaced by the city-specific *Springfield 2030 Comprehensive Plan Economic and Urbanization Elements*; also amended in Chapter II Section G to add the UHA-E land use designation, remove the Springfield specific reference to the Natron Special Heavy Industrial (SHI) site and change footnote 7 to add a reference for this ordinance as contained in Exhibit D attached hereto and incorporated by this reference.

Section 6. The *Metro Plan* Diagram is hereby amended to move the Metro Plan Boundary to be coterminous with the amended Springfield Urban Growth Boundary.

Section 7. The Springfield Development Code is hereby amended to adopt the "Agriculture-Urban Holding Area" (AG) Land Use Zoning District as reflected in Exhibit E attached hereto and incorporated by this reference.

Section 8. The Springfield Zoning Map is hereby amended to assign "Agriculture- Urban Holding Area" (AG) zoning to 328 acres of land and "Public Land and Open Space" (PLO) to 455 acres of land as reflected in Exhibit A-3 attached hereto and incorporated by this reference.

Section 9. The findings set forth in Exhibit F are adopted as findings in support of this Ordinance.

Section 10. The prior policies and plan designations changed by this Ordinance remain in full force and effect to authorize prosecution of persons in violation thereof prior to the effective date of this Ordinance.

Section 11. If any section, subsection, sentence, clause, phrase or portion of this Ordinance is for any reason held invalid or unconstitutional by a court of competent jurisdiction, such portion constitutes a separate, distinct, and independent provision and such holding shall not affect the validity of the remaining portion thereof.

Section 12. The effective date of this Ordinance as provided in the Chapter IX of the Springfield Charter and Section 2.110 of the Springfield Municipal Code, is 30 days from the date of passage by the Council and approval by the Mayor or upon the date that the Lane County Board of Commissioners adopts an ordinance approving the same amendments as described in Sections 1- 9 of this Ordinance.

ADOPTED by the Common Council of the City of Springfield this _____ day of XX, 2016, by a vote of _____ for and _____ against.

APPROVED by the Mayor of the City of Springfield this _____ day of XX, 2016.

Mayor

ATTEST:

City Recorder

Ordinance _____, Exhibit A

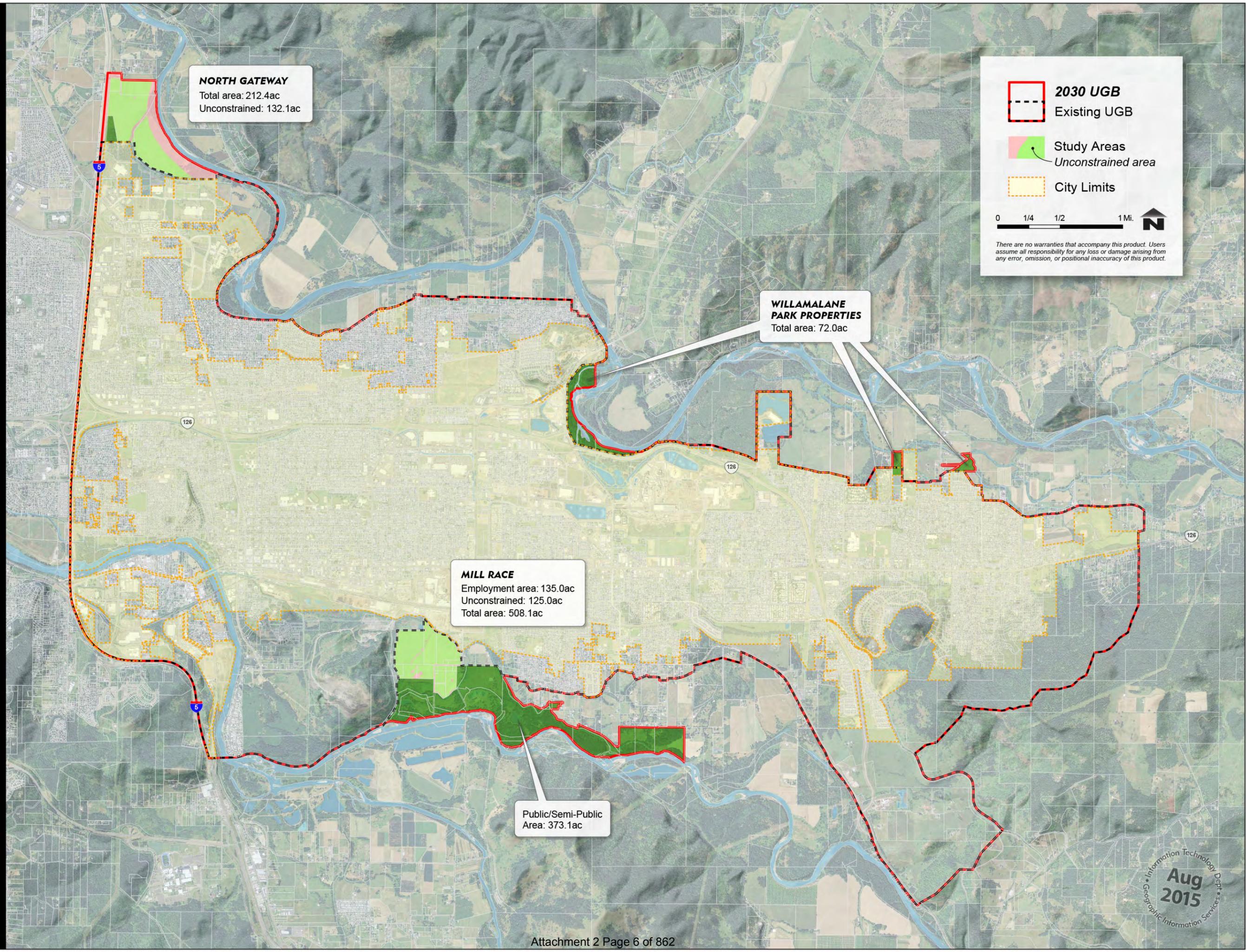
**Proposed amendments to Eugene-Springfield
Metropolitan Area General Plan (Metro Plan) Diagram, Metro Plan Boundary,
Springfield Urban Growth Boundary, and Springfield Zoning Map**

The following amendments to the Metro Plan are necessary to support the Springfield 2030 Comprehensive Plan amendments:

- A-1 Proposed UGB & Metro Plan Boundary Amendment (Metro Plan Boundary to be coterminous with amended UGB)
- A-2 Proposed Metro Plan Designations
- A-3 Proposed Zoning Map Amendments
- A-4 North Gateway and Mill Race UGB Expansion Areas
- A-5 List of affected tax lots



SPRINGFIELD 2030 COMPREHENSIVE PLAN: Proposed UGB Expansion Areas



NORTH GATEWAY
Total area: 212.4ac
Unconstrained: 132.1ac

MILL RACE
Employment area: 135.0ac
Unconstrained: 125.0ac
Total area: 508.1ac

**WILLAMALANE
PARK PROPERTIES**
Total area: 72.0ac

Public/Semi-Public
Area: 373.1ac

2030 UGB
Existing UGB

Study Areas
Unconstrained area

City Limits

0 1/4 1/2 1Mi.

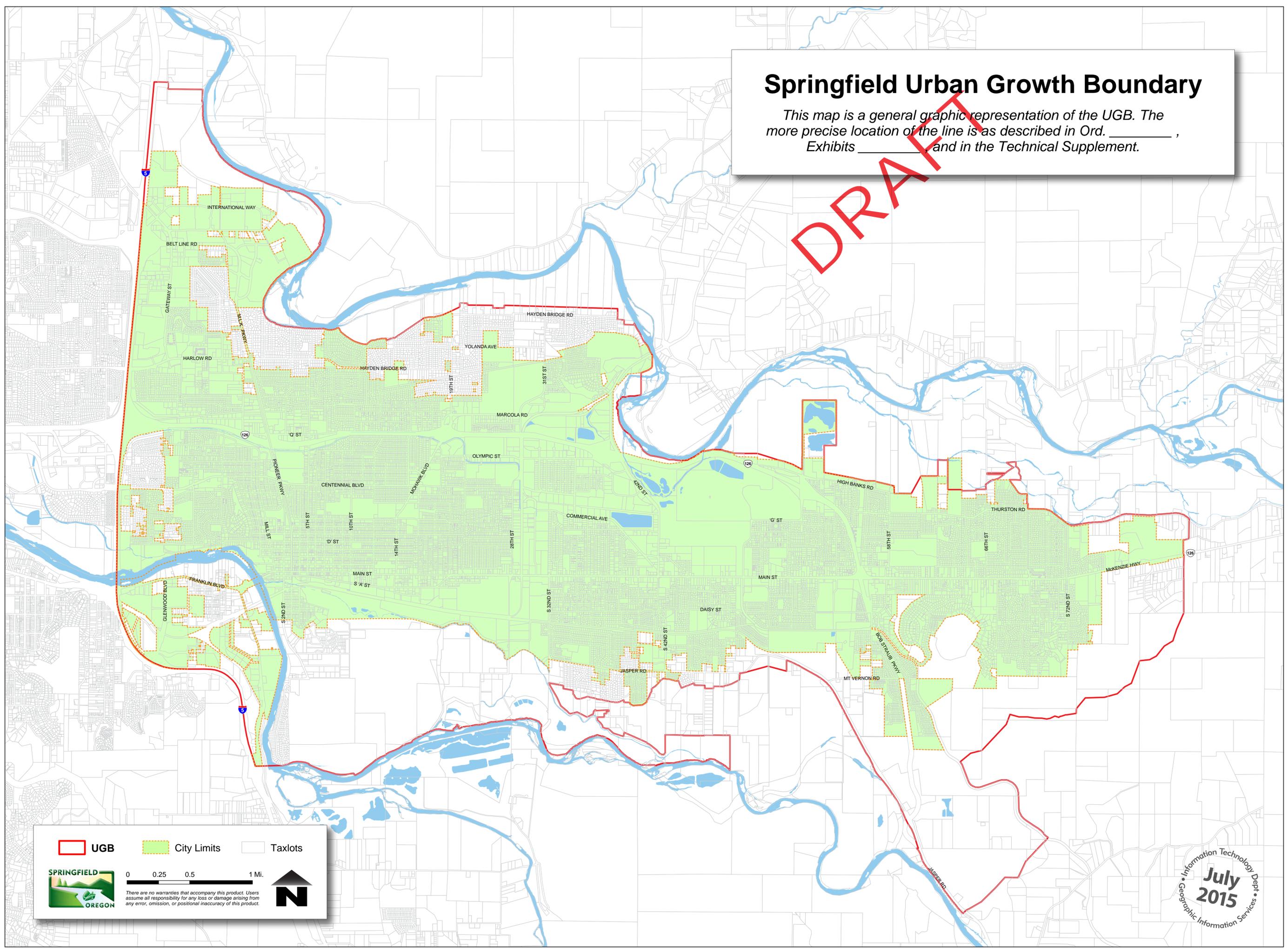
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Springfield Urban Growth Boundary

This map is a general graphic representation of the UGB. The more precise location of the line is as described in Ord. _____, Exhibits _____, and in the Technical Supplement.

DRAFT



Legend:

- UGB (Red outline)
- City Limits (Green fill)
- Taxlots (White fill)

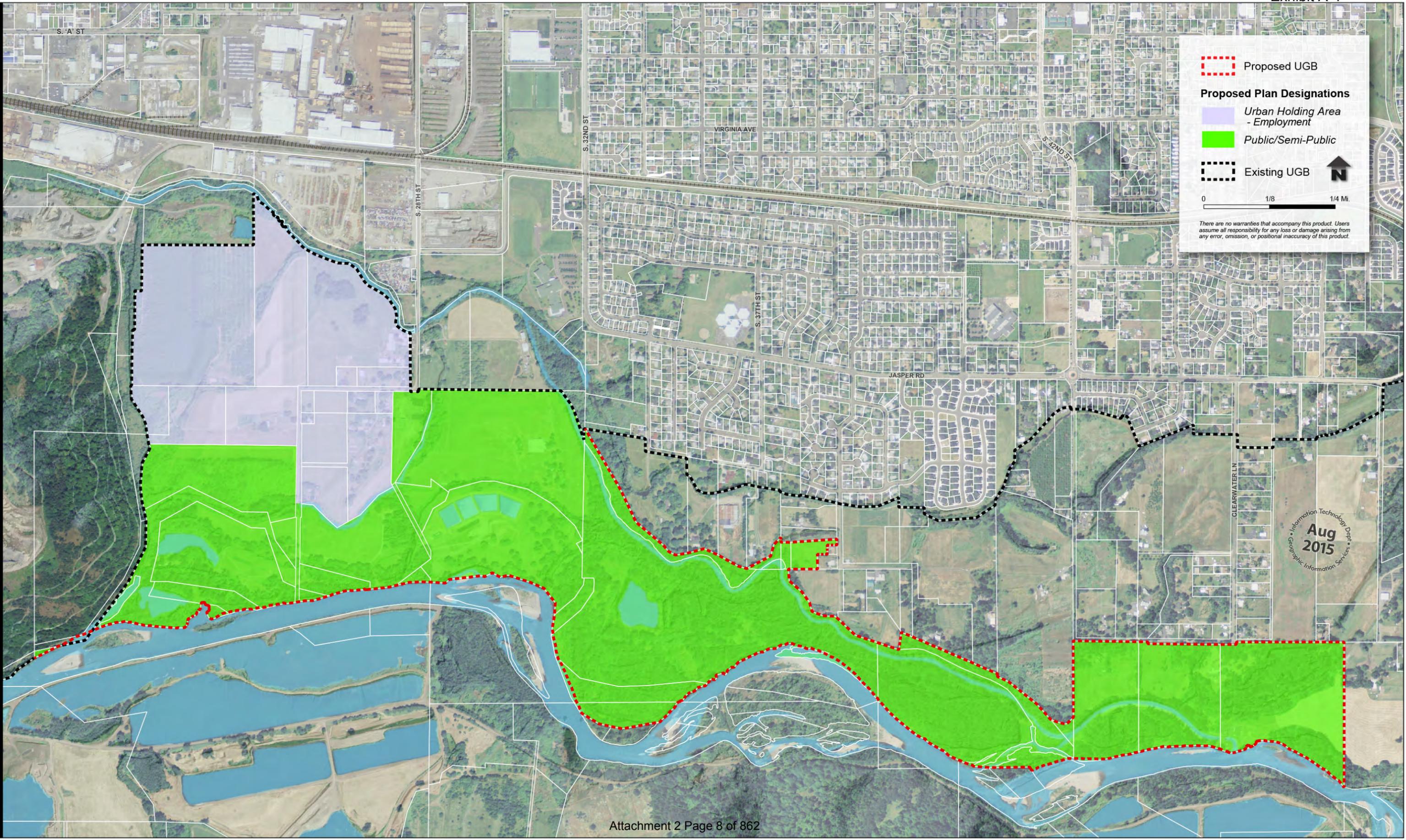
Scale: 0, 0.25, 0.5, 1 Mi.

Disclaimer: There are no warranties that accompany this product. Users assume all responsibility for any loss or damage arising from any error, omission, or positional inaccuracy of this product.

Springfield Oregon

North Arrow





Proposed UGB

Proposed Plan Designations

- Urban Holding Area - Employment
- Public/Semi-Public

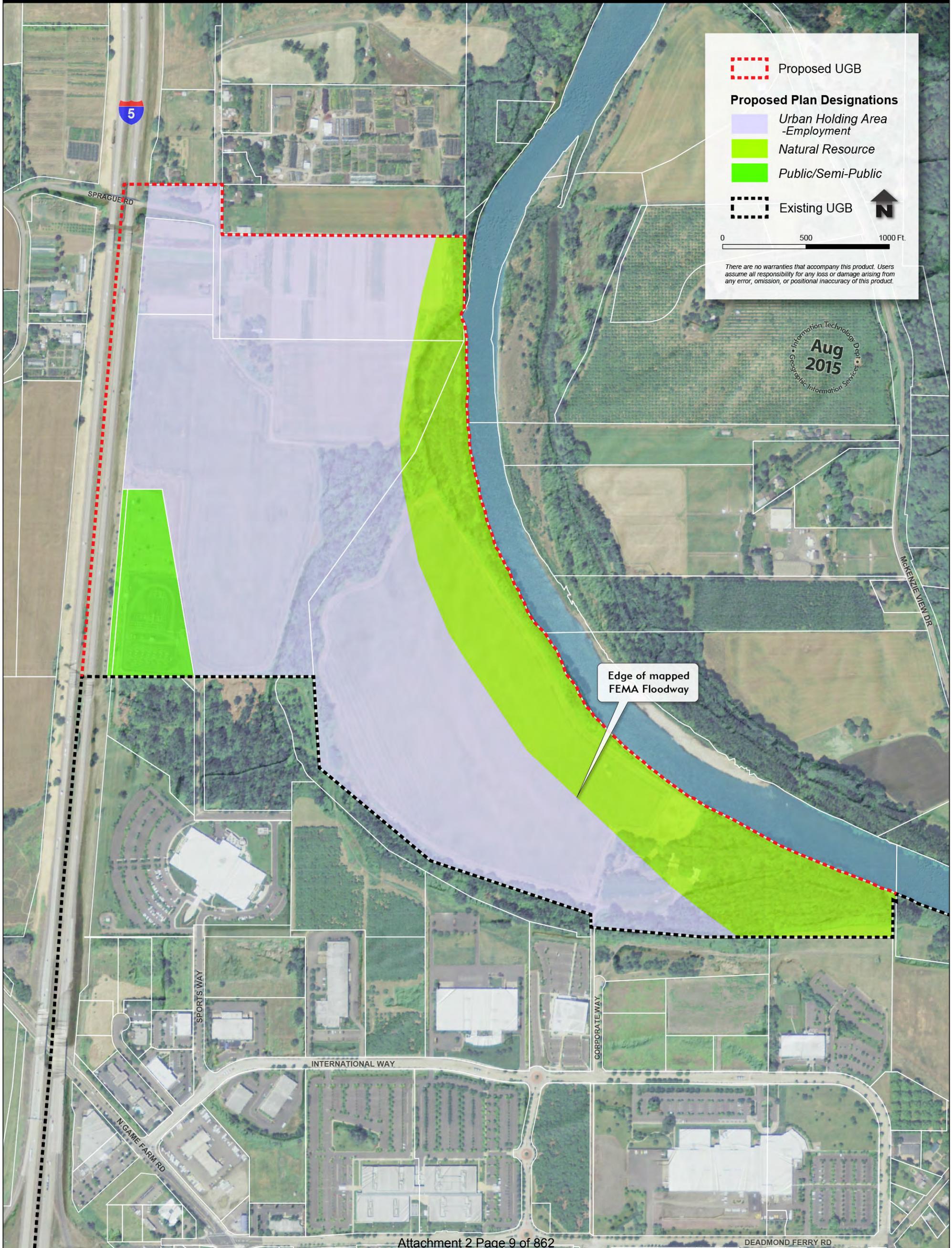
Existing UGB

0 1/8 1/4 Mi.

There are no warranties that accompany this product. Users assume all responsibility for any loss or damage arising from any error, omission, or positional inaccuracy of this product.

Aug 2015
Information Technology Dept.
Geographic Information Services

SPRINGFIELD 2030 COMPREHENSIVE PLAN: Proposed Plan Designations - North Gateway



Proposed UGB

Proposed Plan Designations

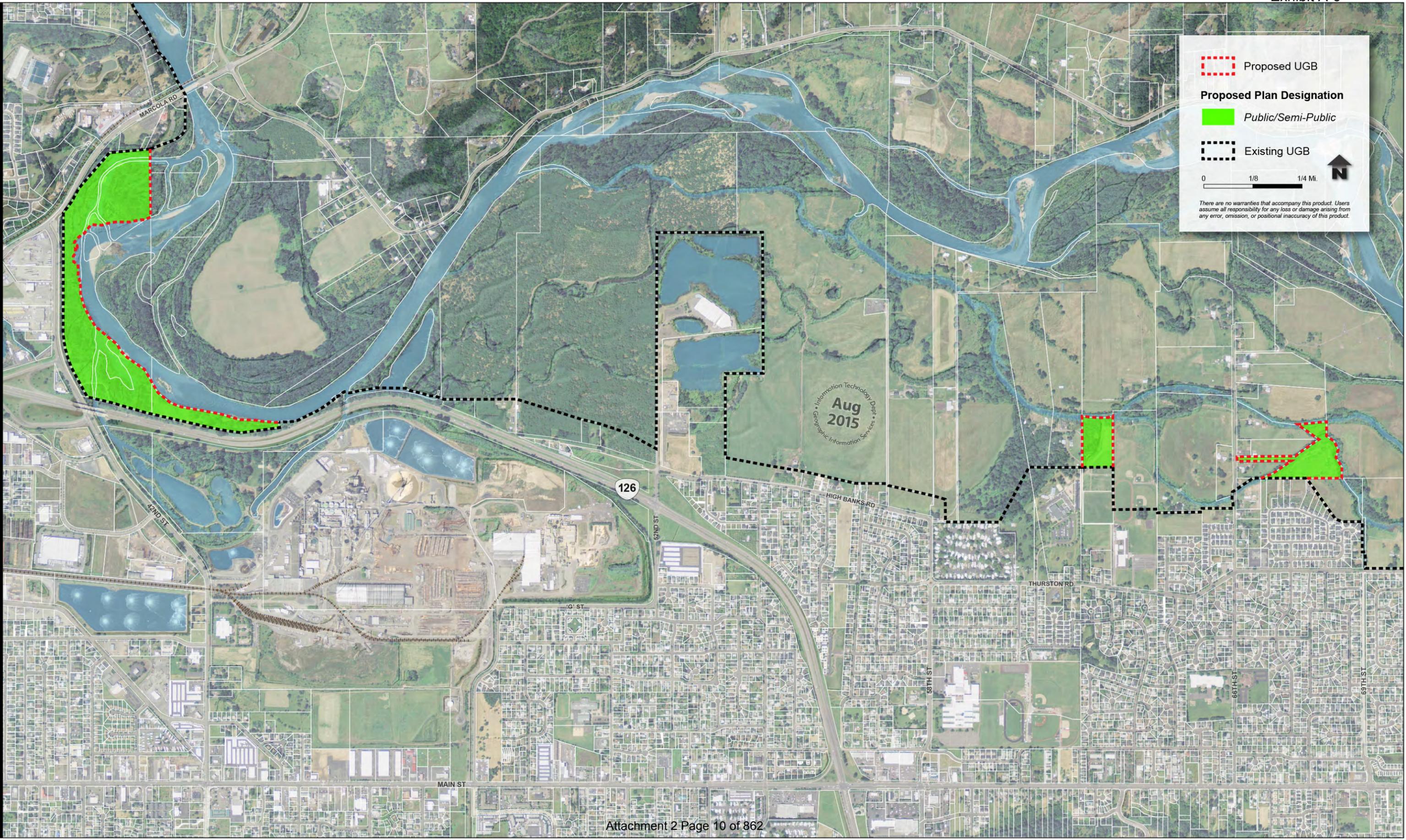
- Urban Holding Area -Employment
- Natural Resource
- Public/Semi-Public
- Existing UGB

0 500 1000 Ft.

There are no warranties that accompany this product. Users assume all responsibility for any loss or damage arising from any error, omission, or positional inaccuracy of this product.

Information Technology Dept.
Aug 2015
 Geographic Information Services

Edge of mapped FEMA Floodway



Proposed UGB

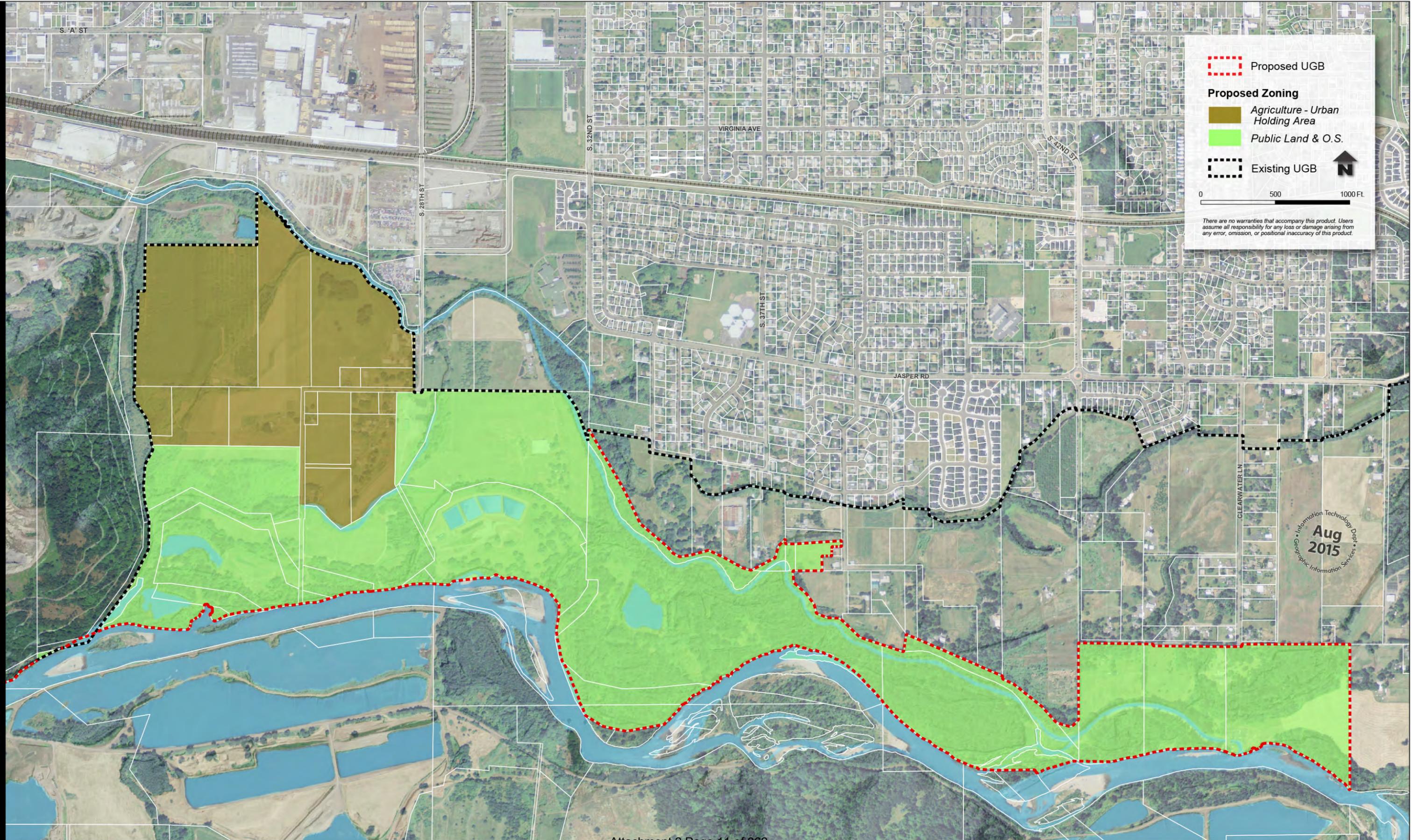
Proposed Plan Designation

Public/Semi-Public

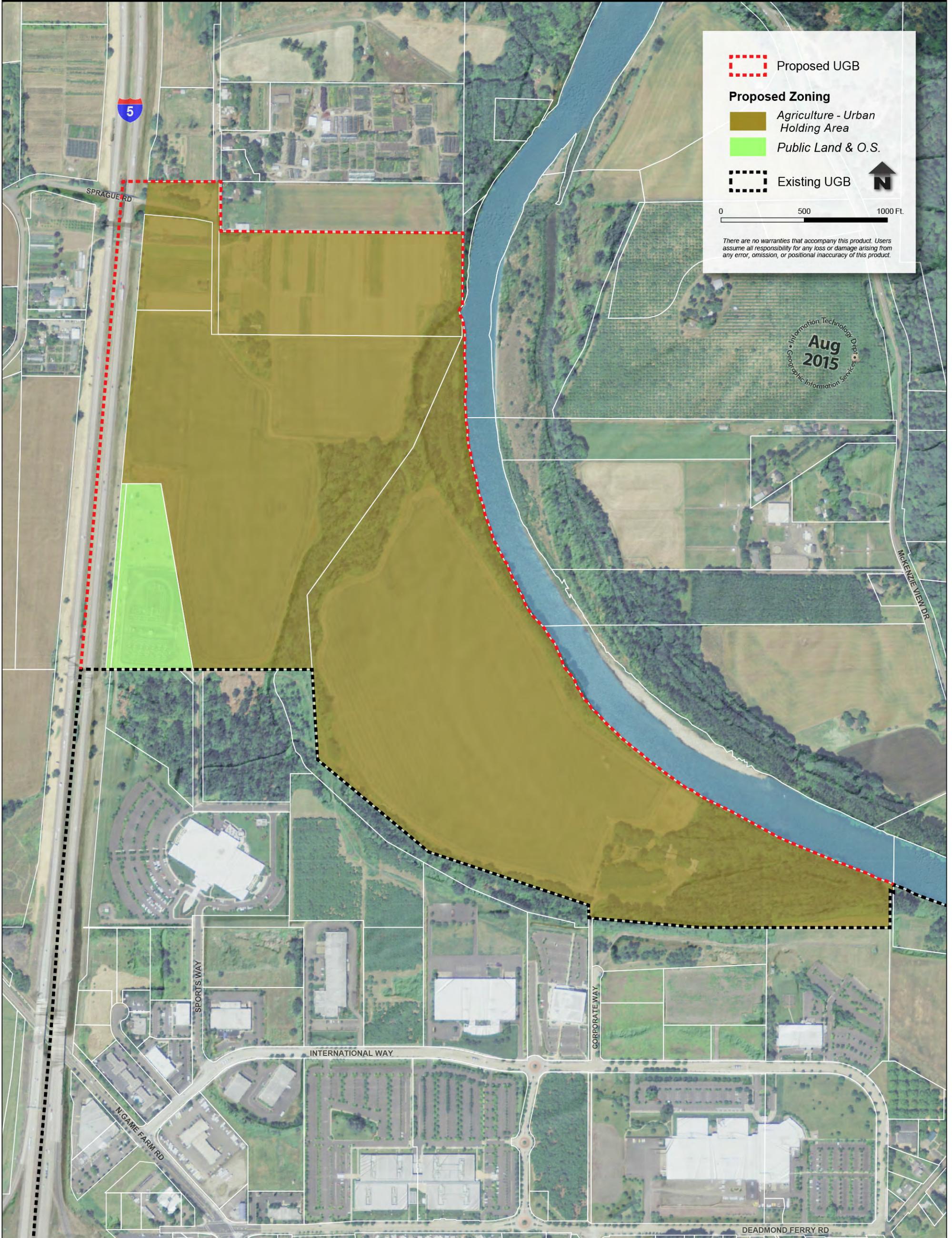
Existing UGB

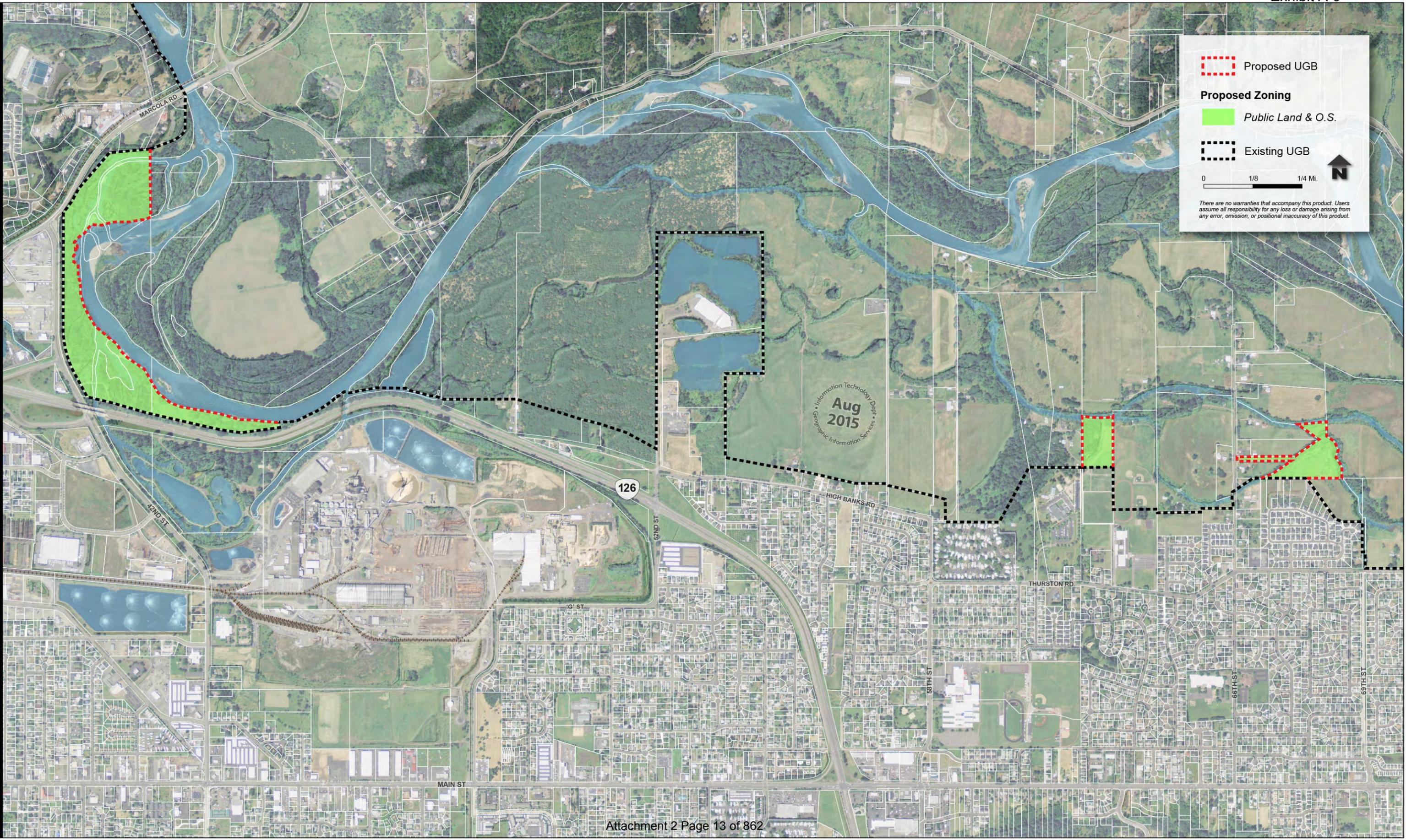
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There are no warranties that accompany this product. Users assume all responsibility for any loss or damage arising from any error, omission, or positional inaccuracy of this product.



SPRINGFIELD 2030 COMPREHENSIVE PLAN: Proposed Zoning - North Gateway





Proposed UGB

Proposed Zoning

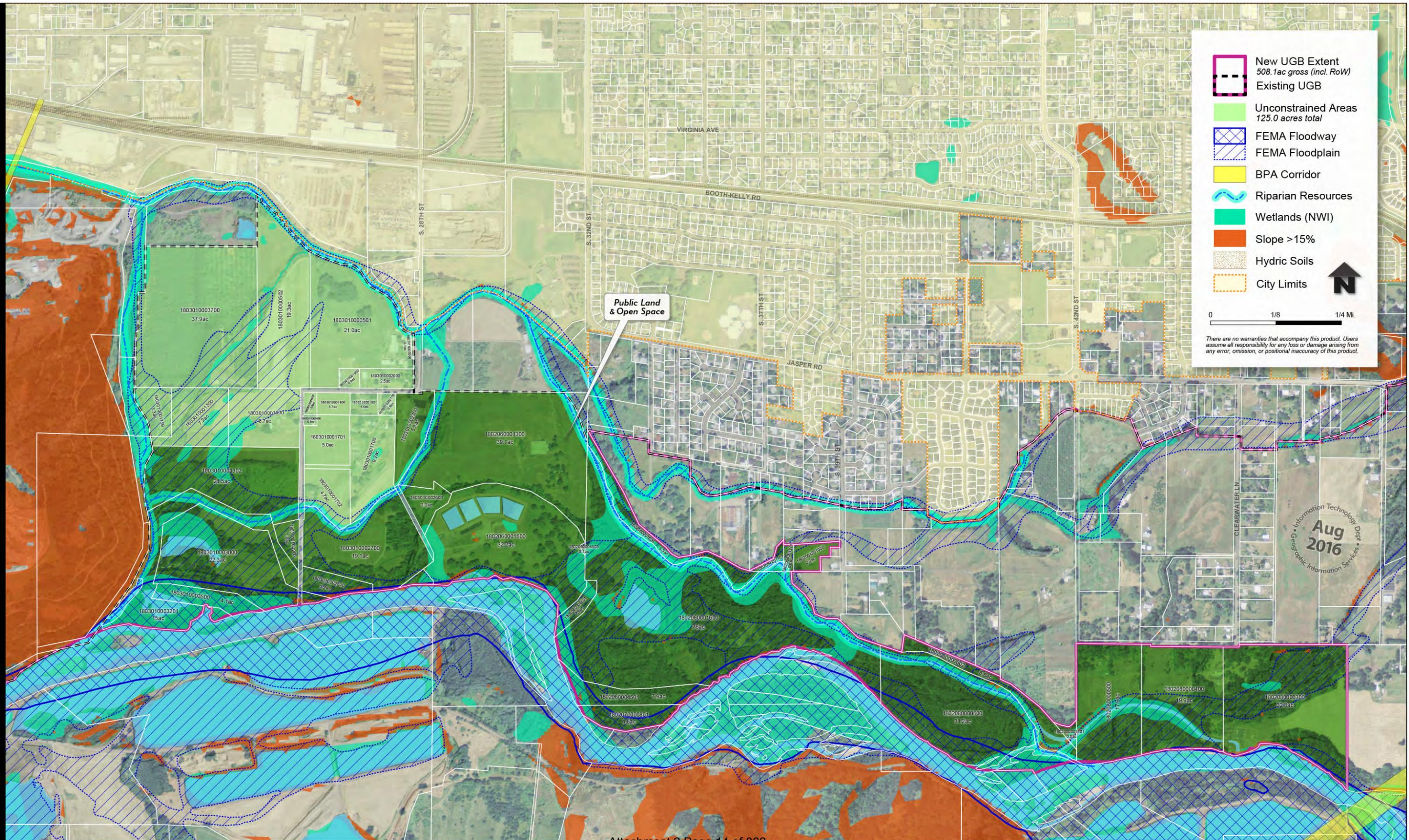
Public Land & O.S.

Existing UGB

0 1/8 1/4 Mi.

↑

There are no warranties that accompany this product. Users assume all responsibility for any loss or damage arising from any error, omission, or positional inaccuracy of this product.



- New UGB Extent
508.1ac gross (incl. RoW)
- Existing UGB
- Unconstrained Areas
125.0 acres total
- FEMA Floodway
- FEMA Floodplain
- BPA Corridor
- Riparian Resources
- Wetlands (NWI)
- Slope > 15%
- Hydic Soils
- City Limits

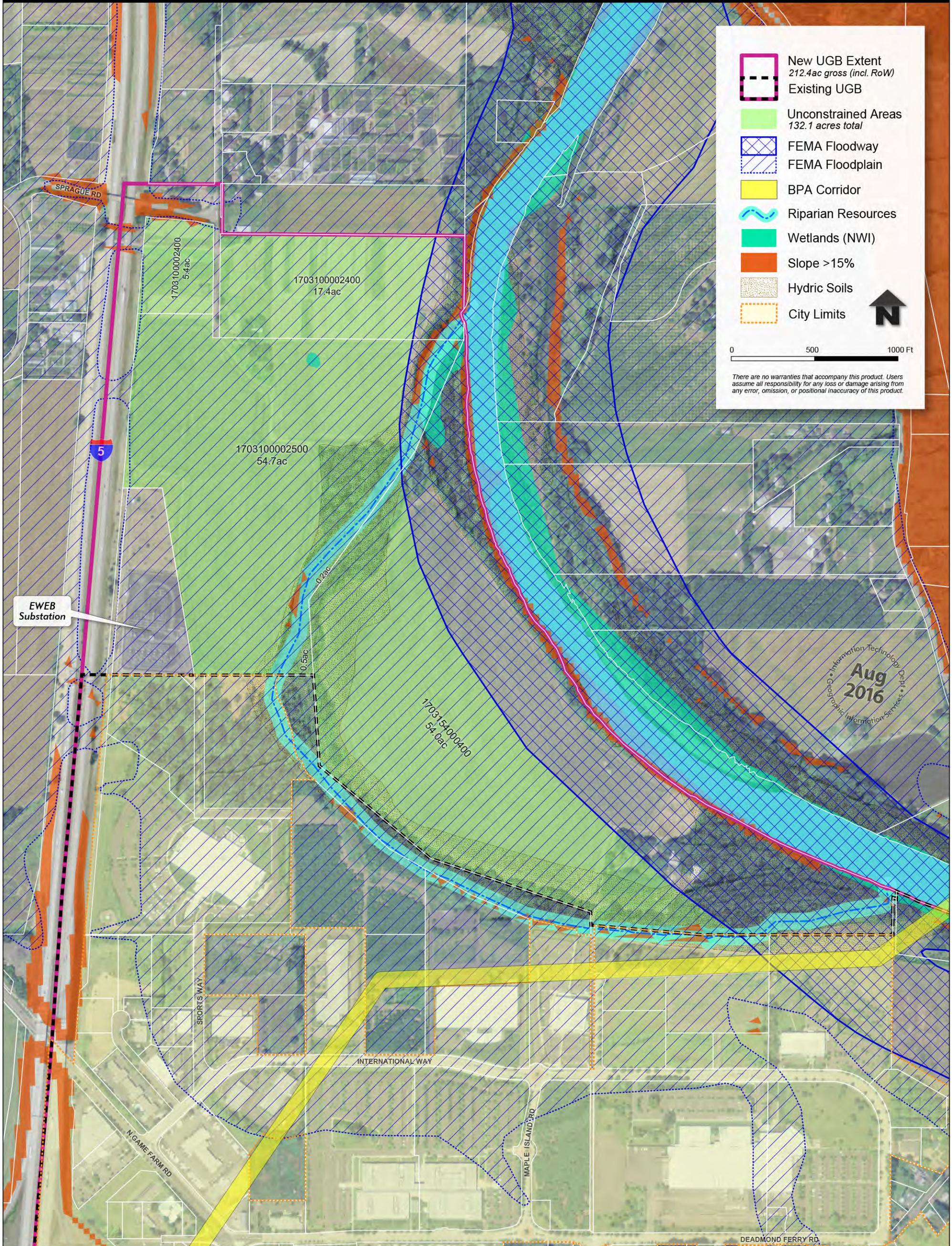
0 1/8 1/4 Mi.

There are no warranties that accompany this product. Users assume all responsibility for any loss or damage arising from any error, omission, or positional inaccuracy of this product.

Public Land & Open Space

Aug 2016
Information Technology Dept.
Geographic Information Services

SPRINGFIELD 2030 COMPREHENSIVE PLAN: Proposed UGB Expansion Area - North Gateway



Legend

- New UGB Extent
212.4ac gross (incl. RoW)
- Existing UGB
- Unconstrained Areas
132.1 acres total
- FEMA Floodway
- FEMA Floodplain
- BPA Corridor
- Riparian Resources
- Wetlands (NWI)
- Slope >15%
- Hydric Soils
- City Limits

0 500 1000 Ft

There are no warranties that accompany this product. Users assume all responsibility for any loss or damage arising from any error, omission, or positional inaccuracy of this product.

Information Technology Dept. & Services
Aug 2016
 Geographic Information Services

	maptaxlot	NET_AREA	PLAN DESIGNATION		ZONING	
			EXISTING	PROPOSED	EXISTING	PROPOSED
NORTH GATEWAY	1703100002300	0.05	Agriculture	UHA-E	E30	Agriculture
	1703100002400	22.84	Agriculture	UHA-E	E30	Agriculture
	1703100002400	3.43	Agriculture	Natural Resources	E30	Agriculture
	1703100002500	58.71	Agriculture	UHA-E	E30	Agriculture
	1703100002500	3.33	Agriculture	Natural Resources	E30	Agriculture
	1703150000800	0.77	Agriculture	Public/Semi-Public	E30	Public Land & Open Space
	1703150000801	8.94	Agriculture	Public/Semi-Public	E30	Public Land & Open Space
	1703154000400	55.03	Agriculture	UHA-E	E30	Agriculture
	1703154000400	46.58	Agriculture	Natural Resources	E30	Agriculture
MILL RACE	1802064201200	0.07	Parks	Public/Semi-Public	E25	Public Land & Open Space
	1802064201201	0.55	Agriculture	Public/Semi-Public	E25	Public Land & Open Space
	1802060001300	39.12	Agriculture	Public/Semi-Public	E25	Public Land & Open Space
	1802070000801	4.52	Parks	Public/Semi-Public	E25	Public Land & Open Space
	1802060001500	32.21	Agriculture	Public/Semi-Public	E25	Public Land & Open Space
	1802060001600	74.74	Agriculture	Public/Semi-Public	E25	Public Land & Open Space
	1802050001801	0.62	Parks	Public/Semi-Public	E25	Public Land & Open Space
	1802060001606	5.29	Parks	Public/Semi-Public	E25	Public Land & Open Space
	1802080000300	32.81	Parks	Public/Semi-Public	PR	Public Land & Open Space
	1802080000400	19.90	Parks	Public/Semi-Public	PR	Public Land & Open Space
	1802080000500	17.76	Parks	Public/Semi-Public	E25	Public Land & Open Space
	1802080000600	29.40	Parks	Public/Semi-Public	SG	Public Land & Open Space
	1802060004501	7.48	Parks	Public/Semi-Public	E25	Public Land & Open Space
	1802060004503	0.09	Parks	Public/Semi-Public	E25	Public Land & Open Space
	1802080000602	5.78	Parks	Public/Semi-Public	SG	Public Land & Open Space
	1803010000500	0.13	Parks	UHA-E	E25	Agriculture
	1803010000501	22.10	Agriculture	UHA-E	E25	Agriculture
	1803010000502	20.55	Agriculture	UHA-E	E25	Agriculture
	1803010001199	3.41	Agriculture	UHA-E	E25	Agriculture
	1803010001300	8.32	Agriculture	UHA-E	E25	Agriculture
	1803010001302	21.51	Agriculture	Public/Semi-Public	E25	Public Land & Open Space
	1803010001400	9.94	Agriculture	UHA-E	E25	Agriculture
	1803010001500	0.67	Agriculture	UHA-E	E25	Agriculture

	1803010001600	0.34	Agriculture	UHA-E	E25	Agriculture
	1803010001700	10.03	Agriculture	UHA-E	E25	Agriculture
	1803010001701	5.03	Agriculture	UHA-E	E25	Agriculture
	1803010001702	5.26	Agriculture	UHA-E	E25	Agriculture
	1803010001800	1.71	Agriculture	UHA-E	E25	Agriculture
	1803010001801	1.44	Agriculture	UHA-E	E25	Agriculture
	1803010001900	0.95	Agriculture	UHA-E	E25	Agriculture
	1803010002000	2.48	Agriculture	UHA-E	E25	Agriculture
	1803010002100	0.91	Agriculture	UHA-E	E25	Agriculture
	1803010002300	5.86	Parks	Public/Semi-Public	E25	Public Land & Open Space
	1803010002600	3.03	Parks	Public/Semi-Public	E25	Public Land & Open Space
	1803010002700	19.05	Agriculture	Public/Semi-Public	E25	Public Land & Open Space
	1803010002800	3.16	Parks	Public/Semi-Public	PR	Public Land & Open Space
	1803010002900	1.85	Agriculture	Public/Semi-Public	E25	Public Land & Open Space
	1803010003000	22.20	Parks	Public/Semi-Public	PR	Public Land & Open Space
	1803010003201	14.72	Parks	Public/Semi-Public	PR	Public Land & Open Space
	1803010003500	3.98	Parks	Public/Semi-Public	SG	Public Land & Open Space
	1803010003700	39.18	Agriculture	UHA-E	E25	Agriculture
	1802064201000	2.19	Agriculture	Public/Semi-Public	E25	Public Land & Open Space
	1802064201100	0.30	Parks	Public/Semi-Public	E25	Public Land & Open Space
	1802064201101	0.69	Agriculture	Public/Semi-Public	E25	Public Land & Open Space
WILLAMALANE PARKS	1702270001101	6.44	Agriculture	Public/Semi-Public	E30	Public Land & Open Space
	1702270001502	9.99	Agriculture	Public/Semi-Public	E30	Public Land & Open Space
	1702290002901	7.50	Parks	Public/Semi-Public	E40	Public Land & Open Space
	1702300000401	42.75	Parks	Public/Semi-Public	E40	Public Land & Open Space

Ordinance _____, Exhibit B

Proposed amendments to Eugene-Springfield Metropolitan Area General Plan (Metro Plan) to adopt the Springfield 2030 Comprehensive Plan Economic Element and its Technical Supplement — the Springfield Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis (CIBL/EOA) — as Springfield’s comprehensive plan in compliance with Statewide Planning Goal 9, Economic Development. The Economic Element contains city-specific goals, policies, implementation measures and findings to address Springfield’s land needs for economic development and employment growth for the 2010-2030 planning period, replacing *Metro Plan* Economic Element policies applicable to lands within Springfield’s jurisdictional area.

- B-1 Springfield 2030 Comprehensive Plan Economic Element
- B-2 Technical Supplement to the Springfield 2030 Comprehensive Plan Economic Element: Springfield Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis for the Planning Period 2010-2030

Metro Plan Amendment
Springfield Ordinance _____, Lane County Ordinance _____

SPRINGFIELD 2030 COMPREHENSIVE PLAN

ECONOMIC ELEMENT

OVERVIEW

The Springfield 2030 Comprehensive Plan (2030 Plan) is currently being developed as Springfield's new land use comprehensive plan policy document applicable to Springfield's jurisdictional area of the Metro Plan. The purpose of this **Economic Element** is to identify the goals, objectives, policies, implementation actions and findings that the City of Springfield, in cooperation with Lane County, has adopted to provide an adequate land supply for economic development and employment growth in compliance with Statewide Planning Goal 9, Economic Development.

The economic development policy direction established through adoption of the **Economic Element** is focused to capitalize on Springfield's strengths and opportunities within the broader Southern Willamette Valley region. The goals and objectives express the desired community development outcomes and economic benefits the City aspires to achieve. The policies and implementation actions are the City's agreements and commitments to support the growth of the local, regional and State economy through land use patterns that provide and sustain a healthy, prosperous and equitable environment aligned with Springfield's interests, values and assets.

Goal 9. Economic Development – To provide adequate opportunities throughout the state for a variety of economic activities vital to the health, welfare, and prosperity of Oregon's citizens.

The **Economic Element** identifies Springfield's preferred land use strategies to support industrial and other employment ¹ development opportunities in the community. The City conducted a Commercial and Industrial Land Needs study in 2008-2009 to update the community's

¹ As defined in Oregon Administrative Rule 660-009-0005: "Other Employment Use" means all non-industrial employment activities including the widest range of retail, wholesale, service, non-profit, business headquarters, administrative and governmental employment activities that are accommodated in retail, office and flexible building types. Other employment uses also include employment activities of an entity or organization that serves the medical, educational, social service, recreation and security needs of the community typically in large buildings or multi-building campuses.

economic patterns, potentialities, strengths and deficiencies as they relate to state and national trends. The work product of the study — the *City of Springfield Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis* (August 2015) prepared for the City of Springfield by ECONorthwest — is adopted as the Technical Supplement to the **Economic Element**. Economic development issues identified in the draft *Springfield Economic Development Plan* (2006) were incorporated into the analysis and strategies. Input was received from citizens, stakeholder groups, commissions and elected officials through a citizen involvement process that included a Commercial and Industrial Buildable Lands (CIBL) Stakeholder and Technical Advisory Committees, online public survey, visioning workshops, work sessions, open houses and public hearings conducted between 2008 and 2016.

RELATIONSHIP TO THE METRO PLAN, FUNCTIONAL PLANS AND REFINEMENT PLANS

The Springfield Comprehensive Plan **Economic Element** establishes the comprehensive plan policies and land use regulations applicable to lands within Springfield’s Urban Growth Boundary that are designated for commercial and industrial uses. The **Economic Element** was adopted as an amendment to the Eugene-Springfield Metropolitan Area General Plan (Metro Plan) by the City of Springfield and Lane County as a city-specific comprehensive plan policy element to independently address a planning responsibility that was previously addressed on a regional basis in the Metro Plan.² The Economic Element goals, policies and implementation actions replace the more general Metro Area-wide goals, findings and policies contained in Metro Plan Economic Element Chapter IIIB. The Springfield Comprehensive Plan elements — including this **Economic Element** — explicitly supplant the relevant portion of the Metro Plan. Should inconsistencies occur between the Springfield Comprehensive Plan and a refinement or functional plan, or references in the Springfield Development Code that refer to Metro Plan policies, the Springfield Comprehensive Plan is the prevailing policy document.³

The **Economic Element** provides policy direction for updating and amending refinement plans, zoning, and development regulations to address the community’s commercial, industrial and other employment development needs. As Springfield implements this element — through future adoption of updates to land use refinement plans at the city-wide, district, corridor, and

² Metro Plan pp. iii-iv and Chapter II describes the incremental Metro planning area shift towards separate Springfield and Eugene UGBs and city-specific comprehensive plans.

³ During the period of transition from Metro Plan to local comprehensive plans, Springfield’s “comprehensive plan” consists of the acknowledged Metro Plan and the acknowledged Elements of the Springfield 2030 Comprehensive Plan.

neighborhood scales, and through the review of property owner-initiated plan amendment or zoning proposals—the City shall continue to analyze the suitability and capacity of the existing commercial, industrial and other employment designations in terms of location, intensity and mix of uses, design, and infrastructure. Based on more detailed and specific levels of analysis, the City shall amend the *Springfield 2030 Comprehensive Plan* and *Metro Plan* diagram as necessary.

The plan diagram and neighborhood refinement plans identify the geographic locations and describes the physical characteristics of Springfield’s existing commercial, industrial and mixed use districts. Refinement plans provide guidance for implementing **Economic Element** policies by establishing new districts or zones, by refining existing districts or zones, and by establishing criteria for mixing land uses within a zone or development area to achieve Springfield’s economic development objectives.

COORDINATION WITH METRO AREA ECONOMIC DEVELOPMENT GOALS

The *Metro Plan* Economic Element articulates the region’s economic goals and objectives. The Plan lists a single economic development goal:

Broaden, improve, and diversify the metropolitan economy while maintaining or enhancing the environment.

Springfield’s economic development planning goals affirm this Metro Plan goal with an appropriate emphasis on maintaining and enhancing Springfield's role, responsibility, and identity within the regional and state economies of which it is a part.

The **Economic Element** also integrates the goals and strategies of the *Regional Prosperity Economic Development Plan* — approved by the Springfield, Eugene and Lane County Joint Elected Officials (JEO) in February 2010 — to acknowledge Springfield’s commitment to coordinating the land use policies that will support the creation of economic opportunities that are closely aligned with our region’s assets and values.

The Springfield 2030 Comprehensive Plan implements, interprets, and supplements the Metro Plan Economic Element as follows:

SPRINGFIELD ECONOMIC DEVELOPMENT PLANNING GOALS

EG-1 Broaden, improve and diversify the state and regional economy, and the Springfield economy in particular, while maintaining or enhancing environmental quality and Springfield’s natural heritage.

- EG-2 Support attainment of the Regional Prosperity Economic Development Plan⁴ goals for creating new metropolitan area jobs in the chosen economic opportunity areas, increasing the average annual wage and reducing unemployment.
- EG-3 Strengthen and maintain strong, connected employment centers and economic corridors to support small, medium and large businesses.
- EG-4 Establish, strengthen and maintain viable commercial centers to improve the community's access to goods and services.
- EG-5 Support the development of emerging economies guided by the following principles:⁵
- a. Healthy Living—Champion businesses and entrepreneurs that promote a healthy, safe, and clean community while enhancing, protecting, and making wise use of natural resources.
 - b. Ideas to Enterprise—Encourage a culture of entrepreneurship and re-investment into the local community.
 - c. Regional Identity—Create a strong economic personality that celebrates our region's attributes and values.
 - d. Be Prepared—Contribute to development of the region's physical, social, educational, and workforce infrastructure to meet the needs of tomorrow.
 - e. Local Resilience— Support businesses and entrepreneurs that lead the city and region to greater economic independence, innovation, and growth of the traded sector economies.
- EG-6 Encourage and facilitate community and stakeholder collaboration.
- EG-7 Make development decisions predictable, fair and cost-effective.

⁴ *Regional Prosperity Economic Development Plan* — approved by the Springfield, Eugene and Lane County Joint Elected Officials (JEO) in February 2010

⁵ *Ibid*

The **Economic Element** implements and interprets these economic development goals and principles through the following Economic Development Policies and Implementation Actions:

SPRINGFIELD ECONOMIC DEVELOPMENT POLICIES AND IMPLEMENTATION STRATEGIES

Goal EG-1	Broaden, improve and diversify the state and regional economy, and the Springfield economy in particular, while maintaining or enhancing environmental quality and Springfield’s natural heritage.	
Policy E.1	Designate an adequate supply of land that is planned and zoned to provide sites of varying locations, configurations, size and characteristics as identified and described in the Economic Opportunity Analysis ⁶ to accommodate industrial and other employment over the planning period. These sites may include vacant undeveloped land; partially developed sites with potential for additional development through infill development; and sites with redevelopment potential.	
Implementation Strategy	1.1	Amend the UGB, Metro Plan diagram and text to add 223 acres of suitable employment land ⁷ to accommodate employers requiring sites larger than 20 acres. Preserve suitable sites for future development by creating and applying the “Urban Holding Area - Employment” (UHA – E) plan designation and the “Agriculture – Urban Holding Area” zone to the sites as described in the Urbanization Element and Springfield Development Code.
Implementation Strategy	1.2	Continue to conduct focused neighborhood, district, and corridor refinement planning processes that engage the community to identify sites with potential for infill and redevelopment; and work collaboratively to update planning and zoning to support job creation and more efficient land use.
Implementation Strategy	1.3	Encourage and support redesignation, rezoning, environmental clean-up and redevelopment of brownfields and older industrial sites to allow these lands to redevelop with clean industries and new uses, especially when located in the Willamette Greenway, adjacent to waterways and high value wetlands, and in Drinking Water Protection Zones 1-2 Year TOTZ areas. Provide information to businesses to encourage and facilitate environmental remediation, relocation, and/or redevelopment of these sites.
Policy E.2	Establish minimum parcel sizes within the “Urban Holding Area - Employment “(UHA – E) designated areas to reserve suitable parcels 20 acres or larger and suitable parcels larger than 50 acres.	
Implementation Strategy	2.1	Preserve large (20 acres or greater) Heavy Industrial, Light Industrial, Campus Industrial, Employment Mixed-Use and Commercial Mixed-Use sites for industrial and other employment uses that require large sites, while allowing

⁶ Springfield Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis Final Report, August 2015.

⁷ As described in the Springfield Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis Final Report, August 2015.

		redesignations that allow limited supporting retail uses (e.g. food and beverage) within the building to support the primary employment use.
Policy E.3		Work with property owners and their representatives to ensure that prime development and redevelopment sites throughout Springfield and its Urban Growth Boundary that are designated for employment use are preserved for future employment needs and are not subdivided or used for non-employment uses.
Policy E.4		Expand industrial site opportunities by evaluating and rezoning commercial, residential, and industrial land for the best economic return for the community through the process of City refinement planning, review of owner-initiated land use proposals, expanding the urban growth boundary, and other means.
Implementation Strategy	4.1	Conduct a comprehensive review of Springfield's industrial and commercial land use plan designations and zoning districts (SDC 3.2-305 and 3.2-405) and schedule of use categories (SDC 3.2-310 and 3.2-410) to identify potential updates that may be better aligned with the land, real estate and development requirements of modern industry and commerce to ensure that Springfield has sites and conditions favorable for industry and commerce to operate efficiently.
Implementation Strategy	4.2	Update the Development Code to create more zoning flexibility for developing industrial or business parks to support clustering of related or complementary businesses.
Implementation Strategy	4.3	Establish an "Employment Mixed-Use" plan designation to allow secondary supporting land uses in walkable employment centers served by multiple modes of transportation to support the goals of compact urban development.
Implementation Strategy	4.4	Prepare or update refinement, corridor and district plans to create more opportunities for mixed land uses. Prioritize planning for mixed-used development that includes retail, office commercial, and multifamily housing in downtown, Glenwood, along the Main Street corridor and along the Downtown to Gateway transit corridor.
Implementation Strategy	4.5	Continue to support policies and develop implementation tools to encourage economically feasible mixed-use development and nodal development in Springfield's downtown, Glenwood, and in mixed-use nodes in locations identified through the refinement planning process.
Implementation Strategy	4.5	Encourage co-location of residential and commercial uses in existing buildings by developing resources to make available financial assistance for necessary building upgrades to meet requirements in the building code, such as improvements to meet seismic standards.
Implementation Strategy	4.6	Increase opportunities for siting employment centers where they can be efficiently served by multiple modes of transportation.
Policy E.5		Provide an adequate, competitive short-term supply of suitable land to respond to economic development opportunities as they arise. "Short-term supply" means suitable land that is ready for construction within one year of an application for a building permit or request for service extension. "Competitive Short-term Supply" means the short-term supply of land provides a range of site sizes and locations to accommodate the market needs of a variety of industrial and other employment

	uses.	
Implementation Strategy	5.1	Continue to add to the City's short-term supply of land through provision of urban services as resources become available and through annexation and other agreements as described in the Urbanization Element and Springfield Development Code.
Policy E.6	Facilitate short term and long term redevelopment activity and increased efficiency of land use through the urban renewal program, updates to refinement plans and the development review process.	
Policy E.7	Where possible, concentrate development on sites with existing infrastructure or on sites where infrastructure can be provided relatively easily and at a comparatively low cost.	
Policy E.8	Continue implementing the Downtown District Plan and Implementation Strategy adopted in 2010 to guide revitalization and redevelopment in downtown as resources are available.	
Implementation Strategy	8.1	Encourage employers to locate in downtown Springfield, when appropriate.
Implementation Strategy	8.2	Amend the Downtown Refinement Plan and Downtown Mixed Use Zone to create new capacity and support for downtown employment uses that use land more efficiently and minimizes the costs of providing infrastructure.
Implementation Strategy	8.3	Amend infrastructure plans as necessary to include the infrastructure and services that businesses need to operate in downtown Springfield.
Implementation Strategy	8.4	Develop programs to promote investments in existing buildings to make downtown more attractive, (e.g. the Urban Renewal and Main Street programs).
Implementation Strategy	8.5	Develop a marketing strategy to attract businesses to downtown Springfield, including ways to make available low-cost assistance for businesses moving to downtown.
Implementation Strategy	8.6	Continue to partner with TEAM Springfield partners to identify and implement short term and long term actions to revitalize downtown.
Implementation Strategy	8.7	Collaborate with Springfield Utility Board and other service providers to minimize cost of upgrading and modernizing downtown infrastructure.
Implementation Strategy	8.8	Continue to leverage and expand Downtown Springfield as the City's civic and government center by promoting, investing and seeking opportunities to locate new federal, state and local civic buildings in Downtown or, — if Downtown sites are not readily available — in locations with excellent transit connections to or through Downtown.
Policy E.9	Encourage and facilitate redevelopment of Glenwood as a mixed use housing, employment and commercial center.	
Implementation Strategy	9.1	Continue to support redevelopment of sites in Glenwood through planning, key investments, innovative development standards, and focused activity through the Springfield Economic Development Agency (SEDA), the Glenwood Urban Renewal Plan, the Glenwood Refinement Plan and the Glenwood Riverfront Plan Mixed-Use Plan District.
Implementation Strategy	9.2	Provide the public infrastructure and services necessary for development in Glenwood, as funds allow.
Implementation	9.3	Coordinate economic development in Glenwood with regional and State

Strategy		economic development efforts.
Implementation Strategy	9.4	Assist economic development in Glenwood through techniques such as optioning land, land assembly, and cooperative development agreements to assist developers with land assembly issues.
Implementation Strategy	9.5	Recruit anchor institutions, such as academic and health care institutions to locate in Springfield. Recruit to establish a University of Oregon anchor land use in Glenwood to stimulate private investment in redevelopment of vacant or neglected sites.
Implementation Strategy	9.6	Implement the Glenwood Riverfront District/Franklin Corridor District Plan and Phase One plan amendments adopted in 2012.
Policy E.10		Continue to provide public policy and financial support when possible for redevelopment in Springfield. Through the annual Goal-setting process, the City Council shall identify redevelopment target areas.
Implementation Strategy	10.1	Continue to conduct focused refinement planning in key redevelopment areas, as directed by the City Council, and as resources are available.
Implementation Strategy	10.2	Future refinement planning processes shall identify opportunity sites with the greatest potential for redevelopment and shall consider and acknowledge economic analyses to evaluate market potential and feasibility.
Implementation Strategy	10.3	When preparing or amending refinement plans, work with neighborhood groups to identify needs and opportunities for creating neighborhood mixed use centers near schools and parks to encourage development of neighborhood-serving “corner store” scale retail, small office or live-work units in or adjacent to residential areas. Consider establishing a Neighborhood Commercial Mixed Use designation.
Implementation Strategy	10.4	Designate a Neighborhood Mixed Use center in Jasper Natron within one half mile of the future school/park sites.
Implementation Strategy	10.5	Encourage opportunities for employment close to residences, including mixed-use development.
Implementation Strategy	10.6	Establish Employment Mixed-Use plan designations that could be applied to land along the existing and proposed future high capacity transit corridors and in Nodal Development areas.
Goal EG-2		Support attainment of the Regional Prosperity Economic Development Plan⁸ goals for creating of new metropolitan area jobs in the chosen economic opportunity areas, increasing the average annual wage and reducing unemployment.
Policy E.11		Integrate opportunistic economic development objectives into Springfield’s land use and supply analyses and policies.
Implementation Strategy	11.1	Plan, zone and reserve a sufficient supply of industrial and commercial buildable land to create opportunity sites for employment uses identified in the 2015 Economic Opportunities Analysis (EOA), with an initial emphasis on Target Industries listed in the analysis Table S-1, Target Industries, Springfield

⁸⁸ *Regional Economic Development Plan* — approved by the Springfield, Eugene and Lane County Joint Elected Officials (JEO) in February 2010

		2010-2030 (page iii-iv.)
Policy E.12	Recruit or support businesses that pay higher than average wages for the region (as reported by the Oregon Employment Department) to diversify and expand Springfield's economy.	
Implementation Strategy	12.1	Work with other economic development organizations to target and recruit businesses: (1) with above average wages, (2) other benefits such as health insurance, especially for part-time employees, and/or (3) that provide other benefits such as job advancement or ownership opportunities.
Implementation Strategy	12.2	Continue to coordinate with community economic development organizations and local, regional and State economic development agencies to develop a coherent and effective economic development marketing program.
Implementation Strategy	12.3	Work with the State to have one or more sites certified as project-ready through the State's certified Industrial Lands program.
Implementation Strategy	12.4	Encourage the location and expansion of traded sector industries as a means to increase the average wage and contribute to the growth of the local sector economy.
Implementation Strategy	12.5	Support increased potential for employment in one of the regional industry clusters.
Implementation Strategy	12.6	Support development of convention- and tourism-related economic activities.
Goal EG-3	Strengthen and maintain strong, connected employment centers and economic corridors to support small, medium and large businesses.	
Policy E.13	Advocate for and support State, Federal and Metro regional transportation network development policies and initiatives that strengthen Springfield's economic corridor connections and development/redevelopment potential.	
Implementation Strategy	13.1	Take advantage of new commercial and residential development opportunities that will be stimulated by the infrastructure projects identified in the Springfield TSP, such as the Franklin Boulevard improvements in Glenwood.
Policy E.14	Leverage and promote Springfield's Interstate 5 corridor location and visibility.	
Policy E.15	Work with Lane Transit District and Oregon Department of Transportation to ensure that transportation system improvements address the needs of existing commerce while strengthening Springfield's economic corridor connections and development/redevelopment potential.	
Policy E.16	Consider the economic opportunities provided by transportation corridors and seek to maximize economic uses in corridors that provide the most optimal locations and best exposure for existing and future commercial and industrial uses.	
Implementation Strategy	16.1	Develop a Main Street/Oregon Highway 126 corridor plan to update land use designations, zoning, and development standards; evaluate potential nodal development areas; and coordinate with Lane Transit District's planning for

		potential transit system improvements.
Implementation Strategy	16.2	Identify future economic corridor or district improvement areas to be targeted with refinement planning (e.g. Downtown to Gateway, Mid-Main to Mohawk, Urban Holding Areas).
Implementation Strategy	16.3	Plan and zone land to maximize utilization of excellent exposure along Main Street/Highway 126B and Pioneer Parkway as future downtown commercial and employment development sites, as envisioned in the 2010 Downtown District Urban Design Plan.
Policy E.17		Leverage existing rail facilities and future expansion of rail facilities to achieve economic development objectives.
Implementation Strategy	17.1	Maximize existing and future utilization of the Union Pacific rail line that runs through Downtown — providing freight, Amtrak service and the potential for future commuter rail linking major population and employment centers.
Implementation Strategy	17.2	Continue to support and advocate for a high speed rail connection to our Metro area and promote the advantages of the downtown Springfield station site or other Springfield site, and associated rail service maintenance and park and ride facilities.
Implementation Strategy	17.3	Explore the concept of siting a multimodal rail-bus transportation center in Downtown to support new Springfield commerce as discussed during the 2009-2010 Downtown Planning process.
Implementation Strategy	17.4	Work with railroad industrial land specialist staff and Springfield property owners to conduct an inventory of Springfield's existing rail facilities and create a list of industrial sites with existing or previous rail service and/or potential for new service, including opportunities to utilize freight rail line connectivity between Springfield and the Coos Bay port.
Implementation Strategy	17.5	Consider how future expansion of rail freight will affect land use and avoid re-zoning industrial land with rail access to non-industrial uses, while allowing some conversion of existing industrial land to other employment uses, especially in high visibility areas such as the South A corridor east of Downtown, if uses are compatible with heavy rail impacts.
Policy E.18		Coordinate transportation and land use corridor planning to include design elements that support Springfield's economic and community development policies and contribute to community diversity and inclusivity.
Implementation Strategy	18.1	Develop an existing conditions analysis of the corridor that reflects a thorough understanding of relevant community issues and service needs.
Implementation Strategy	18.2	Identify public involvement techniques to increase meaningful participation from traditionally underrepresented groups in the study area.
Implementation Strategy	18.3	Establish preferred design concepts for key intersections along the corridor that integrate vehicle, pedestrian, bicycle and transit needs.
Implementation Strategy	18.4	Conduct corridor planning in a manner that engages representatives of diverse, potentially affected interests, including residents, businesses, service agencies, community organizations and citizens at large to build broad community support.
Implementation Strategy	18.5	Develop and implement an effective and comprehensive public engagement program for each phase of the proposed corridor transportation and land use planning project.

Implementation Strategy	18.6	Investigate design elements that improve streetscape conditions and develop design concepts and treatments for identified improvement areas. Investigate culturally-sensitive design elements that encourage comfortable walking and bicycling among traditionally underrepresented groups.
Implementation Strategy	18.7	Prioritize improvements that would complete local connections to local shopping and service opportunities.
Goal EG-4	Establish, strengthen and maintain viable commercial centers to improve the community's access to goods and services.	
Policy E.19	In the 2030 Plan diagram and Land Use Element, and future refinement planning, locate regional, community and neighborhood-serving commercial uses to support economically viable centers, enhanced commercial corridors, and walkable neighborhood scale mixed-use centers.	
Policy E.20	Support the revitalization of Downtown and re-establishment of a thriving retail commerce center by planning and zoning land to provide larger size redevelopment sites that fit the needs of modern retailers.	
Policy E.21	Plan and support redevelopment of the Glenwood Franklin Riverfront and Downtown districts to be mutually supportive and seek funding to connect the two districts with a pedestrian/bike bridge.	
Policy E.22	Plan, designate and zone land to allow community and neighborhood retail commercial uses in new, existing or expanded mixed use centers/nodes to address the land need for retail described in the Economic Opportunities Analysis; timing shall be coordinated with City refinement planning processes or through property-owner initiated proposals that are consistent with Springfield Comprehensive Plan policies.	
Implementation Strategy	22.1	Expand the Downtown Refinement Plan boundary and Downtown Mixed Use District to support additional commercial activity and to create a more viable retail commercial center as envisioned in the 2010 Downtown District Urban Design Plan and Implementation Strategy; and engage the Downtown Citizen Advisory Committee, Historic Commission and property owners to ensure that the form, scale and intensity of new development contributes positively to the adjacent Washburne Historic District neighborhood. Consider that 100,000-125,000 square feet of retail is required for a viable retail destination district; 50,000-60,000 square feet is needed for an anchor use, such as a grocery store or theater multiplex; and contemporary retail businesses need wider and less deep space than currently provided by buildings on Main Street.
Implementation Strategy	22.2	Develop a retail strategy and recruitment plan for the Downtown District, as described in the 2010 Downtown District Urban Design Plan and Implementation Strategy.
Implementation Strategy	22.3	Zone land and provide incentives for development around the Mill/Main Street/Island Park future plaza site as described in the 2010 Downtown District Urban Design Plan and Implementation Strategy.
Implementation Strategy	22.4	Create more opportunities for neighborhood commercial mixed-use centers to serve new or underserved neighborhoods.
Implementation	22.5	Through the Main Street Corridor planning process, engage the community

Strategy		and property owners to evaluate the market need for a full service grocery store in mid-Springfield, identify potential sites, and update zoning as necessary.
Implementation Strategy	22.6	Plan and zone land in the Jasper Natron area to support neighborhood-serving retail uses, with site(s) and number of acres to be determined through the Springfield 2030 Refinement Plan Diagram planning process.
Implementation Strategy	22.7	Continue to provide staff support to encourage and envision redevelopment of the Mohawk Center.
Implementation Strategy	22.8	Work with SEDA to use Urban Renewal tax increment financing to provide development incentives and funds to support redevelopment of Downtown and Glenwood with available funds.
Implementation Strategy	22.9	Through the Main Street Corridor planning process, work with property owners and stakeholders to consider mixed-use zoning east of 10 th Street along Main Street.
Policy E.23		Identify and target commercial activities that will generate living-wage employment opportunities and/or meet daily needs of local residents.
Policy E.24		Evaluate and redesignate commercially-designated and zoned sites in locations that lack adequate transportation access and visibility to allow development of more suitable uses.
Implementation Strategy	24.1	Consider a future plan amendment and zone change process to redesignate the 7.37-acre commercial area on South 28 th Street to allow expansion of the adjacent industrial district.
Implementation Strategy	24.2	Consider a future plan amendment to redesignate the 7.37-acre commercial area on Thurston Road to Low Density Residential.
Implementation Strategy	24.3	Support property-owner initiated proposals to redesignate and rezone commercial land located outside of any neighborhood refinement plan areas adopted after June 2011 to Residential Mixed-Use when consistent with Springfield 2030 Plan policies.
Implementation Strategy	24.4	Work with property owners and stakeholders through the Main Street Corridor planning process to consider allowing Medium or High Density residential uses in existing commercial zones in addition to commercial uses.
Policy E.25		Update plans and zoning to create more opportunities for mixing compatible commercial uses within employment zones in ways that preserve the industrial land supply, minimize vehicular trips and traffic congestion, and promote convenience and walkability for employees.
Implementation Strategy	25.1	Create more opportunities for limited and complementary secondary commercial uses within buildings in employment zones.
Implementation Strategy	25.2	Study the feasibility of applying an Employment Mixed-Use or “employment transition” zoning concept to land along the south side of South A Street to support mixed-use redevelopment activity adjacent to the downtown Booth-Kelly center and Mill Race restoration areas when development is compatible with the existing and future use of the rail corridor.
Goal		Champion businesses and entrepreneurs that promote a

EG- 5a	healthy, safe, and clean community while enhancing, protecting, and making wise use of our natural resources.	
Policy E.26	Develop and apply new development standards to lands added to the Springfield UGB prior to annexation and development to ensure that new development contributes to a healthy, safe, and clean community while enhancing, protecting and making wise use of natural resources.	
Implementation Strategy	26.1	Develop and apply Drinking Water Source Protection Overlay District development standards in consultation with Springfield Utility Board to the lands added to the UGB to ensure that new development contributes to a healthy, safe, and clean community while maintaining aquifer recharge and protecting drinking water quality and quantity.
Implementation Strategy	26.2	Review and amend the Springfield Development Code Flood Plain Overlay District standards as necessary to maintain compliance with the National Flood Insurance Program to promote public health, safety and welfare, and minimizes public and private losses due to flood conditions.
Policy E.27	Support clean up and re-use of brownfields and contaminated sites as the opportunities for reuse arise.	
Implementation Strategy	27.1	Provide public support to identify, assess, clean up and redevelop brownfields as resources become available through grants, SEDA, community partnerships and private investments.
Implementation Strategy	27.2	Seek and leverage funding for brownfield assessment and clean up as one key tool to assist financing for redevelopment.
Goal EG-5b	Encourage a culture of entrepreneurship and re-investment into the local community.	
Goal EG-5c	Emphasize regional identity by creating a stronger economic personality that celebrates the region's attributes and values.	
Policy E.28	Increase the potential for employment in the regional industry clusters, including: Health Care, Communication Equipment, Information Technology (Software), Metals (Wholesalers), Local Food and Beverage Production and Distribution, Specialty Agriculture, Wood & Forest Products, and Transportation Equipment.	
Implementation Strategy	28.1	Designate and zone land for industrial/technology/business parks to provide opportunities for development of business clusters for related or complementary businesses.
Implementation Strategy	28.2	Promote development of support service businesses for business clusters, including specialized suppliers for the business cluster, restaurants, financial institutions, child care and other services.
Implementation Strategy	28.3	Promote further development of the health care cluster by examining land-use policies and, if necessary, modifying those policies to promote health care cluster development where the supporting uses are consistent with 2030 Plan policies or when policies are amended through a district or corridor refinement planning process.

Implementation Strategy	28.4	Promote development of high-tech businesses by continuing to target these businesses for recruitment and expansion in Springfield.
Implementation Strategy	28.5	Coordinate development of business clusters with other cities and economic development agencies in the Eugene-Springfield region but emphasize development of the business cluster in Springfield.
Implementation Strategy	28.6	Make Springfield a preferred location for the local food production industry by promoting existing, new and growing start-up businesses.
Policy E.29		Strengthen and grow community partnerships and initiatives that seek to optimize coordination of economic development planning with natural resource, open space and parks planning.
Implementation Strategy	29.1	Work with Willamalane and property owners to identify and opportunities to integrate parks and recreation facilities (e.g. multi-use paths) and open space amenities as sites are master planned for economic development. ⁹
Implementation Strategy	29.2	Work with the community and project partners to identify opportunities to plan, design, build and maintain great public spaces as a means to create economic value and neighborhood vitality, as further described in neighborhood refinement plans, the Willamalane Park and Recreation District Comprehensive Plan and this Plan.
Policy E.30		Plan redevelopment and growth areas in ways that maximize sensitive integration of the built and natural environment and that maintain and contribute to the community's access to Springfield's natural, cultural and recreational assets and amenities.
Policy E.31		Work with the Springfield Historic Commission to optimize coordination of economic development planning with historic resources planning.
Implementation Strategy	31.1	Support and champion businesses, entrepreneurs and community groups that preserve and restore historic buildings and sites.
Implementation Strategy	31.2	Encourage and support Springfield Historic Commission programs and activities to educate the public about Springfield's historic resources.
Implementation Strategy	31.3	Encourage and support the integration of historic interpretation elements into public and private economic development activities.
Policy E.32		Support community partnerships and initiatives that seek to grow the creative economy including but not limited to: cultural industry clusters and arts districts; cultural tourism; jobs in film, television, publishing, news media, music, video games, social media, design, advertising, performing and visual arts; and update land use planning and codes to ensure that Springfield has land appropriately zoned to encourage these opportunities.
Policy E.33		Support and champion arts and culture to enhance economic development by partnering with the Springfield Arts Commission, Library, Museum, School District 19, Travel Lane County and community arts organizations that seek to increase the public's access to the visual, performing, literary, design and architectural arts by

⁹ Including but not limited to opportunities identified in the most recent Willamalane Comprehensive Plan.

	building partnerships across sectors, missions and levels of government, leveraging funds from diverse sources and programs.	
Implementation Strategy	33.1	Collaborate and partner with community arts organizations and the private sector on proposals and grant applications for projects that seek to increase and broaden the public's access to the arts.
Implementation Strategy	33.2	Support proposals that seek to establish art districts, events, arts education facilities, studios, performing arts programs, performance spaces, theaters, artist-in-residence programs, artist live-work residences and other initiatives that contribute to the emergence and growth of Springfield's creative economy.
Implementation Strategy	33.3	Explore and consider creating a "Percent for Art" program and/or other means to increase and broaden the public's access to the arts.
Implementation Strategy	33.4	Promote and celebrate Springfield's and the region's creative people who find success elsewhere and find bridges for them to contribute back to our community.
Policy E.34	Partner with local business and economic development organizations to develop and implement an on-going public relations campaign that will promote the region's economic identity and successes, both internally and externally.	
Policy E.35	Increase the potential for convention- and tourist-related economic activities to generate economic activity, especially in the service industries like retail, food services, and accommodations.	
Implementation Strategy	35.1	Assist with conference center development at a suitable site in Springfield with a goal of making it financially independent with self-sustaining operations.
Implementation Strategy	35.2	Encourage development of destination point projects (like the Springfield Museum Interpretive Center, Dorris Ranch Living History Farm and McKenzie River fishing and recreational activities) that draw visitors to the Springfield area from regional, national, and international areas.
Implementation Strategy	35.3	Identify, protect and enhance the factors that are likely to attract visitors to Springfield, especially Springfield's environmental quality and natural beauty (e.g. a well-designed wayfinding system).
Implementation Strategy	35.4	Promote Springfield's and the region's natural and cultural resources to enhance the cultural tourism within the region.
Policy E.36	Promote awareness and advocacy for Springfield's and the region's quality of life, that continues to support and attract investment and innovative entrepreneurial talent and builds on our dynamic and diverse economic community.	
Implementation Strategy	36.1	Support NEDCO's business incubator programs and the Downtown Springfield Main Street Program.
Implementation Strategy	36.2	Nurture and strengthen the diversity, quality and vigor of Springfield's physical, cultural, and educational environment as a fundamental source of the City's economic viability by encouraging minority-run businesses and economic entrepreneurship.

Policy E.37	Support sustainable businesses and practices. A sustainable business is any organization that participates in environmentally friendly or green activities to ensure that all processes, products, and manufacturing activities adequately address current environmental concerns while maintaining a profit, or businesses that “meet the needs of the present world without compromising the ability of the future generations to meet their own needs.” ¹⁰	
Implementation Strategy	37.1	Foster a diverse sustainable economy by partnering locally with other organizations to explore opportunities and overcome vulnerabilities, incubate and coordinate projects and facilitate dialogue, action and education within the community.
Implementation Strategy	37.2	Promote and recruit businesses that produce sustainable products, have sustainable business practices, and/or have sustainable manufacturing processes.
Implementation Strategy	37.3	Support land use patterns that provide easy, multi modal transportation options to access services and reduce transportation costs.
Implementation Strategy	37.4	Consider adjusting development fees, prioritizing services or other incentives for development projects to recognize the benefits provided by projects that are certified as sustainable to nationally recognized standards (e.g., LEED buildings) as economically feasible.
Implementation Strategy	37.5	Consider providing incentives for development that use sustainable building materials or solutions (e.g. using permeable pavement) or use of renewable energy sources (e.g. solar or wind power).
Implementation Strategy	37.6	Consider future agricultural needs and economic opportunities to protect agricultural lands for production of local food when developing policies that will impact agricultural land outside of the Springfield UGB.
Goal EG-5d	Be prepared—Contribute to development of the region’s physical, social, educational, and workforce infrastructure to meet the needs of tomorrow.	
Policy E.38	Strengthen the coordination between infrastructure, planning and investments, land use, and economic development goals to prepare land and physical infrastructure, in a timely fashion, that is necessary to support business development and stimulate quality job creation.	
Policy E.39	Provide adequate infrastructure efficiently and distribute cost fairly.	
Policy E.40	Provide the services, infrastructure, and land needed to attract the identified industry clusters, especially where they can increase economic connectivity among businesses.	
Implementation Strategy	40.1	Coordinate capital improvement planning with land use and transportation planning to coincide with Springfield’s Economic Element.

¹⁰ United Nations General Assembly (1987) [Report of the World Commission on Environment and Development: Our Common Future](#). Transmitted to the General Assembly as an Annex to document A/42/427 - Development and International Co-operation: Environment

Implementation Strategy	40.2	Provide the necessary public facilities and services as funds become available to foster economic development.
Implementation Strategy	40.3	Target resources for sites that provide prime opportunities for employment uses as a result of location, site size, or other significant site characteristics.
Implementation Strategy	40.4	Ensure that public private development agreements are in effect prior to financing public improvements to ensure cost recovery.
Implementation Strategy	40.5	Explore alternative funding mechanisms in addition to debt service that provide timely completion of 'connecting' public facilities (e.g. an unpaved block of a street or missing sections of sewer line).
Implementation Strategy	40.6	Make efficient use of existing infrastructure by promoting development, infill, re-use, and redevelopment for commercial and industrial uses and develop strategies and incentives to stimulate private investment that is resilient to downturns in the local economy.
Implementation Strategy	40.7	Continue to seek funding opportunities and public-private partnerships to construct key urban infrastructure elements that support pedestrian and transit-friendly redevelopment in Glenwood and Downtown, such as the Franklin multiway boulevard in Glenwood and enhancements to the Main Street/South A couplet through Downtown.
Implementation Strategy	40.8	Continue to provide development tools and incentives (such as Urban Renewal support) within targeted priority redevelopment areas as funds become available to facilitate expedient and economically feasible redevelopment.
Implementation Strategy	40.9	Develop and implement systems to monitor the supply of commercial and industrial lands. This includes monitoring commercial and industrial development (through permits) as well as land consumption (e.g. development on vacant, or redevelopable lands).
Implementation Strategy	40.10	Support development of citywide high-speed internet access and other telecommunications infrastructure systems with public and private providers.
Implementation Strategy	40.11	Provide information on infrastructure availability on a site-by-site basis so that developers can readily assess infrastructure availability on any given site.
Implementation Strategy	40.12	Work with property owners and their representatives to ensure that prime development and redevelopment sites throughout Springfield and its Urban Growth Boundary are known, aggregated, ready to develop, and marketed.
Implementation Strategy	40.13	Continue to institute program management and process improvements that remove "silos" between the City's comprehensive planning, infrastructure planning, capital improvement program, economic and community development, and development review functions to build more collaborative high performance planning and response teams.
Implementation Strategy	40.14	Inventory and evaluate underdeveloped sites and buildings (e.g. "zombie" buildings, brownfields, low-rent and non-compliant buildings) in an effort to assist business re-locations in a timely fashion.

Implementation Strategy	40.15	Continue to work with property and business owners to support expansion, upgrading and construction of “state-of-the art” business facilities.
Policy E.41	Support the growth and development of existing area businesses to achieve quality job creation.	
Implementation Strategy	41.1	Develop and implement an outreach strategy to determine how Springfield can assist the economic well-being of existing businesses. Opportunities for assistance may range from ensuring availability of on-street parking to providing assistance with the development process to forming public-private partnerships to promote local businesses.
Implementation Strategy	41.2	Encourage and support self-help methods and programs for business districts such as the formation of business associations and special self-assessment districts for parking and economic improvement.
Implementation Strategy	41.3	Pursue special projects and grant applications that provide support to local business and industry.
Implementation Strategy	41.4	Continue a City Council program to recognize, champion and award entrepreneurs and local small business accomplishments.
Policy E.42	Support the growth and development of our region’s work ready workforce and extend the benefits of a strong employment base equitably.	
Implementation Strategy	42.1	Work with local agencies to meet and sustain workforce needs, such as: training and education, job advancement, or local expansion of businesses that increase economic diversity and resiliency.
Implementation Strategy	42.2	Support the efforts of partner agencies to encourage local residents to develop skills and other educational attributes that enable them to obtain existing jobs.
Implementation Strategy	42.3	Offer internships and job shadowing educational opportunities for students to get involved in local government.
Implementation Strategy	42.4	Participate in regional efforts to support statewide and/or national workforce development strategic initiatives, such as the “Work Ready Communities” and “National Career Readiness” certification programs.
Implementation Strategy	42.5	Participate in and support efforts to provide appropriate training programs for portions of the resident population that have not benefitted in the past.
Policy E.43	Promote and build on the region’s transportation, distribution and logistics advantages.	
Goal E-5e	Local Resilience— Support businesses and entrepreneurs that lead the city and region to greater economic independence, innovation, and growth of the traded sector economies.	
Policy E.44	Expand the City’s partnerships with the University of Oregon, Lane Community College, Oregon State University and other education institutions to support the development of education and research facilities and programs into Springfield, to	

	bring new technologies and innovations to market, and to promote sustainable practices.	
Policy E.44	Encourage the formation and expansion of creative and technology based ventures by zoning land to allow for well configured and flexible incubator spaces.	
Policy E.45	Consider amendments to regulations that will increase predictability and flexibility for industrial site redevelopment and expansion.	
Implementation Strategy	45.1	Consider establishing a new general “Industrial” plan designation to support several different kinds of industrial development
Implementation Strategy	45.2	Consider establishing a new “Employment” plan designation and zone that allows a broader array of general industrial uses and develop updated buffering standards.
Goal E-6	Encourage and facilitate community and stakeholder collaboration.	
Policy E.46	Identify and include key stakeholder partners in planning efforts to encourage and facilitate redevelopment through public-private partnerships.	
Goal E-7	Make development decisions predictable, fair and cost-effective.	
Policy E.47	Enhance, maintain and market Springfield’s reputation for: rapid processing of permits and applications, maintaining City agreements and commitments, and providing developers with certainty and flexibility in the development process.	
Implementation Strategy	47.1	Continually improve development permitting processes to remove regulatory impediments to redevelopment as practical, provide efficient streamlining of permitting processes, create incentives for redevelopment, and provide flexible design standards (clear and objective track plus discretionary track) to build on the community’s strong reputation as a friendly, welcoming and business-friendly city.
Implementation Strategy	47.2	Develop business practices and tools to facilitate and streamline owner-initiated annexations in Glenwood and elsewhere.
Implementation Strategy	47.3	Streamline the regulatory processes to assist with site selection and development that meet market needs.

FINDINGS:

1. The citizens of the Eugene-Springfield metro area have felt the burden of the financial crisis more so than in other counties and other states. The decline in local jobs, coupled with an increased demand for social services, is putting a strain on city, county and state programs. The Eugene-Springfield metro area unemployment rate in July 2009 was 12.5%, a 6 percentage point increase over 2008, which is slightly higher than the state unemployment rate of 11.9%. The decline in the availability of local jobs has put increased pressure on social services. The number of cases in the federal Temporary Assistance for Needy Families program for our local district has increased 18.5 percentage points over the past year. The number of applications for low-income housing in Lane County in 2008 increased 13 percentage points compared to the previous year. These programs are indicative that the economic crisis has significantly impacted our local economy and that the need for a regional, long-term plan is present. (JEO Staff report 9-14-09)
2. In 2008-2009, the City of Springfield conducted a Commercial and Industrial Buildable Lands Study with three components to comply with statewide planning Goal 9 and the Goal 9 rule (OAR 660-009): (1) a buildable lands inventory; (2) an economic opportunities analysis; and (3) an economic development strategy. The economic development strategy was used to guide development of the policies and implementation strategies in the Economic Element to implement the City's economic development vision. Decision makers and community members that participated in the Commercial and Industrial Buildable Lands Study and development of the Economic Opportunities Analysis agreed that economic growth is desirable over the planning period.
3. The employment forecast indicates Springfield will add 13,440 new employees between 2010 and 2030.
4. The economic opportunities analysis assumes that Springfield will have employment growth in a wide variety of businesses, from services and retail for residents to industrial development to medical services. The City wants to diversify its economy and attract higher wage and professional jobs.
5. In February 2010, the Springfield City Council — together with Eugene and Lane County Joint Elected Officials (JEO) approved the *Regional Prosperity Economic Development*

Plan framework for a regional economic development plan that will better position our regional economy to take advantage of economic opportunities that align with our area's assets and values.

6. The Springfield City Council and Lane County Board of Commissioner adopted the Springfield 2030 Economic Element, acknowledging Springfield's commitment to coordinating land use policies that will support the creation of economic opportunities that are closely aligned with our region's assets and values.
7. *Buildable Lands Inventory.* Springfield's Commercial and Industrial Buildable Lands Inventory identifies 3,415 acres that are designated for industrial and other employment use. About two-thirds of the land designated for employment within Springfield's UGB is considered developed and is not expected to redevelop over the 20 year planning period. Less than 15% of this land is buildable, unconstrained land. The majority of buildable, unconstrained employment land in Springfield has existing development on it that is expected to redevelop over the planning period. Springfield has a lack of buildable large sites, with one buildable site 20 acres and larger and 23 buildable sites in the five to 20 acre size range.
8. *Employment that will not require vacant land.* Springfield assumed that 46% of employment would not require vacant employment land. Springfield's assumptions about employment that will not require vacant land are as follows:
 - Fourteen percent of employment (1,918 employees) will locate in non-employment designations. These employees will include people with home occupations, working from home, and businesses that locate in residential or other non-employment designations. This assumption is based on the percent of employment located in non-employment designations in 2006. (Ref. EOA Appendix C and Table C-7)
 - Ten percent of new employment will locate in existing built space. (Ref EOA Appendix C and Table C-7)
 - Twenty-two percent of new employment will locate on potentially redevelopable land.
9. Springfield will be able to meet employment land needs on sites five acres and smaller within the existing UGB, through redevelopment, infill development, and employment uses on non-employment land (e.g., home occupations).

10. Redevelopment potential. The analysis of redevelopment potential and need for employment land in the EOA assumes that Springfield will have substantial redevelopment over the planning period. Consistent with City Council policies, the areas that are expected to have the most redevelopment are in Glenwood Urban Renewal District — especially along the Willamette Riverfront and Franklin/McVay corridor — and in the Downtown Urban Renewal District.
 - All land deficiencies for sites smaller than five acres are expected to be addressed through redevelopment of existing sites.
 - The majority of retail land needs are expected to be addressed through redevelopment.
 - The City will need to make strategic investments that support redevelopment and to continue supporting redevelopment through City plans and policies. For example, redevelopment in the City's targeted Downtown and Glenwood areas will require substantial investments in public infrastructure to provide public facilities and remove the existing impediments to development.
11. Brownfields redevelopment. As development in Springfield consumes the supply of vacant lands, brownfields are becoming an increasingly important share of the land supply for growth of employment and commerce. Productive re-use of brownfields is integral to the City's redevelopment goals.
12. OAR 660-009-0005 identifies environmental contamination as a development constraint that temporarily or permanently limits or prevents the use of land for economic development. The City's Commercial and Industrial Buildable Lands Inventory did not deduct contaminated sites from the buildable lands inventory.
13. The high cost of brownfield investigation and clean-up continue to give greenfield sites a competitive advantage over brownfields. There is a significant gap in brownfield redevelopment feasibility without public intervention. Ultimately, achieving industrial redevelopment of brownfields may require incentives from government at the state and federal levels.
14. Citywide, industrial brownfield redevelopment issues lack adequate funding and programmatic responses. Many of these sites likely will they require more investment to become redevelopable than they are currently worth. Other sites are too small, have

complex constraints, or have high transaction costs for investors who are new to brownfield redevelopment. Currently, the City's does not have the resources to fund a Brownfield Program and can only rely on grant-funded programs to address a small percentage of these sites.

15. In 2012, the City — together with Eugene and Lane County — received a brownfield grant from the state that enables study and assessment of brownfield sites in portions of Springfield. This information will help the City determine industrial development/redevelopment feasibility on these Springfield sites. Springfield has many known brownfield sites that will require clean-up before the sites can be redeveloped. For example, a recent inventory conducted as part of the Springfield-Eugene-Lane County EPA grant work has identified 17 properties likely to be brownfields in the Glenwood area alone. The City expects that hundreds of properties along the Main Street corridor contain brownfields that will require clean-up before the sites can be redeveloped. These and other known contaminated sites are shown in the City's Contaminated Source Inventory map maintained by the City's GIS department.
16. Need for large sites. The employment land needs that may not be met within the UGB are for sites five acres and larger. The City has only one buildable site 20 acres or larger.
17. Availability of sites 20 acres and larger is important for attracting or growing large businesses, which are often traded-sector businesses. If the City does not have these large sites, there is little chance that the City will attract these types of businesses.
18. *Short-term land supply.* Based on the Goal 9 definition of short-term land supply and criteria for "engineering feasibility," all of the buildable land within the Springfield UGB is part of the short-term land supply, assuming that funding is available to extend services. The Goal 9 rule does not account for land availability, such as whether the landowner is willing to sell it or the owner is willing to redevelop it. The Goal 9 rule also does not account for differences in site characteristics, such as site size. As a result, developers may have difficulty finding developable land with specific site characteristics, such as large sites with highway access.
19. Springfield conducted Community Economic Development workshops on May 20, 2008 and July 31, 2008 to identify issues and themes for development of economic development objectives and strategies. The following table provides a summary of input received:

Summary of Input from the 2008 Springfield Economic Development Workshops	
Category	Issues and Themes
Jobs and the economy	<ul style="list-style-type: none"> ▪ Attract businesses that provide stable, living or family wage jobs that provide benefits ▪ Recruit businesses that provide green or sustainable products ▪ Lower the costs of doing business in the City, such as system development charges and permitting fees ▪ Attract businesses to the City through the use of enterprise zones
Sustainability and the environment	<ul style="list-style-type: none"> ▪ Balance environmental protection and greenfield development ▪ Encourage green building practices for new development ▪ Capitalize on opportunities to increase walkability and bicycling
Land use and zoning	<ul style="list-style-type: none"> ▪ Balance the use of developing green-fields with redeveloping existing land and emphasizing infill ▪ Encourage more efficient land uses, including higher density development where appropriate ▪ Promote nodal development and mixed-use development, especially in downtown ▪ Provide opportunities for high quality development along the riverfront ▪ Reevaluate allowable uses, especially near schools ▪ Consider parking and transportation needs when planning for new uses, especially in downtown
Redevelopment	<ul style="list-style-type: none"> ▪ Focus on redevelopment in downtown and Glenwood. ▪ Revitalize downtown through redevelopment and rehabilitation of old buildings ▪ Promote re-use of vacant buildings in downtown ▪ Keep a historical perspective when considering redevelopment

Source: ECO Northwest Springfield Economic Development Objectives and Strategies

20. Economic development objectives and strategies that encourage transition to a greener economy can help strengthen the local economy by driving demand for locally provided products and services that conserve energy and reduce emissions. The need for research, design, development, manufacture and retrofit of cleaner, more energy efficient and more sustainable alternatives presents major economic opportunities.

Source: ECO Northwest

21. Oregon is home to some of the nation's leading developers, builders, architects, engineers and product manufacturers in the green building industry. These businesses spread economic benefits to the community by creating "green collar" jobs — skilled and semi-skilled, well-paying jobs that contribute directly to preserving or enhancing environmental quality. For example, Oregon's rapidly growing clean energy sector is

showing strong demand for trained workers, including solar installers and wind turbine technicians. *Source: ECO Northwest*

22. Efforts to retrofit buildings for energy performance, develop the next generation of biofuels, design new ways to package goods and meet countless other needs with more sustainable practices will create many new jobs. *Source: ECO Northwest*
23. A shift away from fossil fuels such as coal, petroleum and natural gas will add substantial indirect economic benefits. By redirecting energy dollars to pay for efficiency improvements and non-fossil fuel energy, businesses and residents will spend more money locally, expanding markets for locally produced products and services. *Source: ECO Northwest*
24. Springfield supports the establishment of a critical mass of clean energy firms, such as wind developers, photovoltaic manufacturers, biodiesel producers and energy efficiency consultants in our region. *Source: ECO Northwest*
25. Land use policies that foster higher density development and redevelopment along transit corridors and mixed use compact development patterns will allow more residents to meet their daily needs without driving and to reduce household transportation costs. A more substantial portion of those saved dollars can be spent in the local economy where they have economic multiplier effects. *Source: ECO Northwest*
26. With Springfield's and the region's workforce expected to grow, the need for job growth will become even more pressing. Given the role that location of employment plays in where people live and how much they drive, weak job growth in the city will drive demand for additional infrastructure spending, increase transportation costs for Springfield residents and undermine regional efforts in land use and climate action. *Source: ECO Northwest*
27. To affect economic development, any policy or action must affect a factor of production that influences business locations and job growth. Factors that have the most impact are labor, land, local infrastructure, access to markets and materials, agglomerative economies (clusters), quality of life and entrepreneurship. *Source: ECO Northwest*
28. The supply, cost, and quality of any of these factors are dependent upon national and global market forces that local government has no influence over. But they also depend on public policy, which can generally affect these factors of production through:

planning, regulation, provision of public services, taxes, and incentives. *Source: ECO Northwest*

29. The location decisions of businesses are primarily based on the availability and cost of labor, transportation, raw materials, and capital. The availability and cost of these production factors are usually similar within a region. Most economic development strategies available to local governments only indirectly affect the cost and quality of these primary location factors. *Source: ECO Northwest*

30. Local governments can most directly affect tax rates (within the bounds of Measures 5 and 50), the cost to businesses and quality of public services, and regulatory policies. Economists generally agree that these factors do affect economic development, but the effects on economic development are modest. Thus, most of the strategies available to local governments have only a modest affect on the level and type of economic development in the community. *Source: ECO Northwest*

31. Local governments in Oregon also play a central role in the provision of buildable land through inclusion in the Urban Growth Boundary, plan designation, zoning, and provision of public services. While providing buildable land for businesses to locate or expand is one of the most direct ways that the City of Springfield can affect the level and type of economic development, this action alone is not sufficient to guarantee economic development in the community. Market conditions must create demand for this land, and local factors of production must be favorable for business activity.

32. As part of Springfield’s Commercial and Industrial Buildable Lands Study, a range of potential economic development strategies were identified to inform policy development:

Potential Economic Development Strategies	
Category/Policy	Description
Land Use	Policies regarding the amount and location of available land and allowed uses.
Provide adequate supply of land	Provide an adequate supply of development sites to accommodate anticipated employment growth with the public and private services, sizes, zoning, and other characteristics needed by firms likely to locate in Springfield.
Increase the efficiency of the permitting process and development codes and land use plans that are clear and concise. simplify city land-use policies	Take actions to reduce costs and time for development permits. Adopt

Potential Economic Development Strategies	
Category/Policy	Description
Public Services	Policies regarding the level and quality of public and private infrastructure and services.
Provide adequate infrastructure to support employment growth	Provide adequate public services (i.e. roads, transportation, water, and sewer) and take action to assure adequate private utilities (i.e. electricity and communications) are provided to existing businesses and development sites.
Focused public investment	Provide public and private infrastructure to identified development or redevelopment sites.
Communications infrastructure	Actions to provide high-speed communication infrastructure, such as developing a local fiber optic network.
Business Assistance	Policies to assist existing businesses and attract new businesses.
Business retention and growth	Targeted assistance to businesses facing financial difficulty or thinking of moving out of the community. Assistance would vary depending on a given business' problems and could range from business loans to upgrades in infrastructure to assistance in finding a new location within the community.
Recruitment and marketing	Establish a program to market the community as a location for business in general, and target relocating firms to diversify and strengthen the local economy. Take steps to provide readily available development sites, an efficient permitting process, well-trained workforce, and perception of high quality of life.
Development districts (enterprise zones, renewal districts, etc.)	Establish districts with tax abatements, loans, assist with infrastructure, reduced regulation, or other incentives available to businesses in the district that meet specified criteria and help achieve community goals.
Business clusters	Help develop business clusters through business recruitment and business retention policies. Encourage siting of businesses to provide shared services to the business clusters, including retail and commercial services.
Public/private partnerships	Make public land or facilities available, public lease commitment in proposed development, provide parking, and other support services.
Financial assistance	Tax abatement, waivers, loans, grants, and financing for firms meeting specified criteria. Can be targeted as desired to support goal such as recruitment, retention, expansion, family-wage jobs, or sustainable industry.
Business incubators	Help develop low-cost space for use by new and expanding firms with shared office services, access to equipment, networking opportunities, and business development information. Designate land for live-work opportunities.
Mentoring and advice	Provide low-cost mentors and advice for local small businesses in the area of management, marketing, accounting, financing, and other business skills.
Export promotion	Assist businesses in identifying and expanding into new products and export markets; represent local firms at trade shows and missions.

Potential Economic Development Strategies	
Category/Policy	Description
Workforce	Policies to improve the quality of the workforce available to local firms.
Job training	Create opportunities for training in general or implement training programs for specific jobs or specific population groups (i.e. dislocated workers).
Job access	Provide transit/shuttle service to bring workers to job sites.
Jobs/housing balance	Make land available for a variety of low-cost housing types for lower income households, ranging from single-family housing types to multifamily housing.
Other	
Regional collaboration	Coordinate economic development efforts with the County, the State, and local jurisdictions, utilities, and agencies so that clear and consistent policies are developed.
Quality of life	Maintain and enhance quality of life through good schools, cultural programs, recreational opportunities, adequate health care facilities, affordable housing, neighborhood protection, and environmental amenities.

Source: ECONorthwest.

33. According to Oregon Prospector, at the time Springfield's EOA was prepared there are only nine sites in the Southern Willamette Valley with the following characteristics: 20 acres or larger, Project Certified, and within about five miles of I-5. The following counties have sites that match these characteristics: three sites in Marion County, one site in Benton County, two sites in Linn County, no sites in Lane County, and three sites in Douglas County. There are comparatively few large sites relatively near to I-5 available for development in the Southern Willamette Valley and no sites with these characteristics in the Eugene-Springfield area.
34. "Short-term supply" means suitable land that is ready for construction usually within one year of an application for a building permit or request for service extension. "Competitive Short-term Supply" means the short-term supply of land provides a range of site sizes and locations to accommodate the market needs of a variety of industrial and other employment uses.
35. Continued emphasis on investments in transit, infrastructure, housing and social service at the expense of economic development will not grow the local economy. Job growth requires explicit investments in retaining and growing firms, training workers, funding innovation and developing catalytic projects.

36. Springfield does not possess the resources to compete unsystematically in the global economy. A city of Springfield's size and attributes must be selective in how it competes for new business growth; limited economic development resources must be deployed in a manner that builds on the city's undeniable strengths.
37. Needed sites. The site needs analysis in Springfield's Commercial and Industrial Lands Inventory and Economic Opportunities Analysis (CIBL/EOA) identifies site needs in five types of buildings: warehousing and distribution, general industrial, office, retail, and other services. The characteristics of needed sites for each of these building types are described in CIBL/EOA, adopted as the Technical Supplement of this Economic Element. Characteristics of Needed Sites, including site needs for Springfield's target industries: manufacturing and large office employers are explained in CIBL/EOA Chapter 5 and Appendix C.
38. Industrial Land Preservation. Since adoption of the Metro Plan, wetlands were discovered in the Jasper Natron area. The presence of wetlands will affect development of this land, including the sites designated as Special Heavy Industrial (SHI) in the Metro plan diagram.

City of Springfield:

**Commercial and Industrial
Buildable Lands Inventory
and Economic Opportunities
Analysis**

For the Planning Period 2010-2030

Prepared for

City of Springfield

by

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Final Report

August 2015

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Commercial and Industrial Lands Stakeholder Committee 2008-2009

The CIBL Stakeholder Committee provided community and business input in the economic opportunities analysis. The Committee provided guidance on developing Springfield's economic development strategy and provided input on assumptions used in the economic opportunities analysis. Committee members included: City of Springfield elected or appointed officials, local business owners and business people, land-use advocacy groups, and residents of Springfield.

Lee Beyer, Planning Commissioner, Committee Co-Chair
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The Technical Advisory Committee (TAC) provided technical input in the economic opportunities analysis. The TAC included representatives from the City of Springfield Public Works Department, local service agencies, and State agencies.

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Executive Summary

This report presents the Commercial and Industrial Buildable Lands Inventory (CIBL) and Economic Opportunities Analysis (EOA) for the City of Springfield for the 2010 to 2030 period. The purpose of the analysis is to forecast employment growth in Springfield, document the inventory of commercial and industrial land in Springfield,¹ and determine whether Springfield has enough land to accommodate expected growth.

In addition, this project establishes a clear economic development direction that identifies the city's strengths and opportunities, and its position in the broader Southern Willamette Valley region. This project will facilitate employment opportunities and job creation in Springfield by identifying industrial/employment land needs and developing an economic development strategy aimed at selected target industries.

This analysis is consistent with the requirements of statewide planning Goal 9 and the Goal 9 administrative rule (OAR 660-009).

This document, the final CIBL and EOA, includes revisions from the Draft *Springfield Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis* from September 2009. These changes incorporate feedback about the report and address the requirements of recent legal cases about economic opportunity analyses. The primary changes to the document are:

- Clarifications to the methods, definitions, and terms used in the buildable lands inventory, including clarifications about potentially redevelopable land in Springfield.
- Analysis of potentially redevelopable sites larger than 5 acres to determine which sites are likely to redevelop over the 2010-2030 planning period.

¹ OAR 660-009 0005(3) defines "Industrial Use as "employment activities generating income from the production, handling or distribution of goods. Industrial uses include, but are not limited to: manufacturing; assembly; fabrication; processing; storage; logistics; warehousing; importation; distribution and transshipment; and research and development. Industrial uses may have unique land, infrastructure, energy, and transportation requirements. Industrial uses may have external impacts on surrounding uses and may cluster in traditional or new industrial areas where they are segregated from other non-industrial activities.

OAR 660-009 0005(6) defines "Other Employment Use: " all non-industrial employment activities including the widest range of retail, wholesale, service, non-profit, business headquarters, administrative and governmental employment activities that are accommodated in retail, office and flexible building types. Other employment uses also include employment activities of an entity or organization that serves the medical, educational, social service, recreation and security needs of the community typically in large buildings or multi-building campuses.

- Clarifications about Springfield’s target industries and their existing site and other characteristics of the target industries.
- Revision to the number of needed sites, removing the range of needed sites and using historical data to identify the number and size of needed sites.
- Revision to the categories of needed site size, to combine the largest site sizes into one category: sites 20 acres and larger.
- Additional information about the sites needs of Springfield’s target industries.
- Other clarifications that made the analysis and results clearer.

WHAT IS SPRINGFIELD’S ECONOMIC DEVELOPMENT VISION?

Springfield is a business-oriented city. The City is undergoing revitalization, with on-going redevelopment efforts in Downtown and Glenwood, and the opening of the hospital at RiverBend in 2008. The City’s vision for economic growth over the next 20-years combines sustaining existing businesses and helping those businesses expand, and embracing a broad variety of new opportunities for growth.

The economic development strategy for Springfield can be summarized as follows:

- (1) Facilitate the redevelopment of Downtown Springfield and Glenwood through strategic infrastructure and other investments from programs such as urban renewal and planning for redevelopment.
- (2) Provide sites with a variety of site characteristics to meet both commercial and industrial economic opportunities, including providing sites that are available for relatively fast development. This includes providing large sites for major employers.
- (3) Use land within the existing urban growth boundary efficiently, through promoting redevelopment, infill development, and dense development in nodal areas. The study assumes that 46% of new employment would not require vacant land.
- (4) Provide infrastructure efficiently and fairly by coordinating capital improvement planning with economic development planning.
- (5) Support and assist existing businesses within Springfield by assessing what help businesses need and developing programs to respond to business needs.

- (6) Attract and develop new businesses, especially those related to regional business clusters. The City would like to build on the developing health care cluster, promote development of high-tech businesses, and attract sustainable businesses.
- (7) Maintain flexibility in planning through providing efficient planning services and developing flexible planning policies to respond to the changing needs of businesses.

This is a brief summary of Springfield's economic development strategy. Chapter 3 of this report provides more detail on Springfield's comparative advantages and target industries; the Springfield Economic Development Strategy (included in Appendix D) articulates the City's economic development vision.

TARGET INDUSTRIES

An analysis of growth industries in Springfield should address two main questions: (1) Which industries are most likely to be attracted to the Eugene-Springfield area? and (2) Which industries best meet Springfield's economic objectives? The types of industries that Springfield wants to attract to meet economic development objectives are: high-wage, stable jobs with benefits; jobs requiring skilled and unskilled labor; employers in a range of industries that will contribute to a diverse economy; and industries that are compatible with Springfield's community values.

The characteristics of Springfield will affect the types of businesses most likely to locate in Springfield. Springfield's attributes that may attract firms are: the City's proximity to I-5, high quality of life, proximity to the University of Oregon, the presence of the RiverBend campus, positive business climate, availability of skilled and semi-skilled labor, and proximity to indoor and outdoor recreational opportunities. Table S-1 summarizes target industries for Springfield during the 2010 to 2030 planning period.

Table S-1. Target industries, Springfield, 2010-2030

Target Industry	Types of firms	Attraction to Springfield
Medical Services	Medical firms, medical research firms, and other professional services	Development of a medical cluster at RiverBend

Target Industry	Types of firms	Attraction to Springfield
Manufacturing	Manufacturers of: food processing, high-tech electronics, recreational equipment, medical equipment manufacturing, furniture manufacturing, specialty apparel, cottage industries (such as jewelry, apparel, or personal care products), plastics manufacturing, and wood products manufacturing	Labor force, existing businesses, land availability, proximity to natural resources, access and proximity to Interstate 5, and access to comparatively inexpensive electricity
Specialty Food Processing	Food processing firms, such as those that specialize in organic or natural foods, brewing and wine industry	Proximity to agricultural resources, natural foods innovation cluster, access and proximity to Interstate 5, and access to comparatively inexpensive electricity,
High-Tech	The types of firms range from high-tech manufacturing to data centers to software development	Access to highly educated labor, access to comparatively inexpensive electricity, access and proximity to Interstate 5, and high quality of life
Professional and Technical Services	Engineering, research, medical-related professionals, and other professional services that are attracted to high-quality settings	Access to highly educated labor and high quality of life
Call Centers	Call centers	Existing call center cluster and trained labor force
Back-Office Functions	Back-office functions, including administrative functions such as accounting or information technology	High quality of life, available and trained labor force, and relatively low wages
Corporate Headquarters	Corporate headquarters	High quality of life, location along I-5, and availability of educated workers
Tourism	Industries that serve tourists, such as food services and accommodations	Proximity to University of Oregon, outdoor recreational opportunities and regional events such as the Olympic Track and Field trials, NCAA sporting events, the Oregon Country Fair, or the University of Oregon Bach Festival
Green businesses	Green construction firms, organic food processing, sustainable logging and/or lumber products manufacturing, or alternative energy production	Access to highly educated labor, access to natural resources, and high quality of life
Services for Residents	Retail and government services, especially education	Growing population
Services for seniors	Health services that provide services to older people, such as assisted living facilities or retirement centers	Aging population and presence of RiverBend Hospital and McKenzie Willamette Hospital

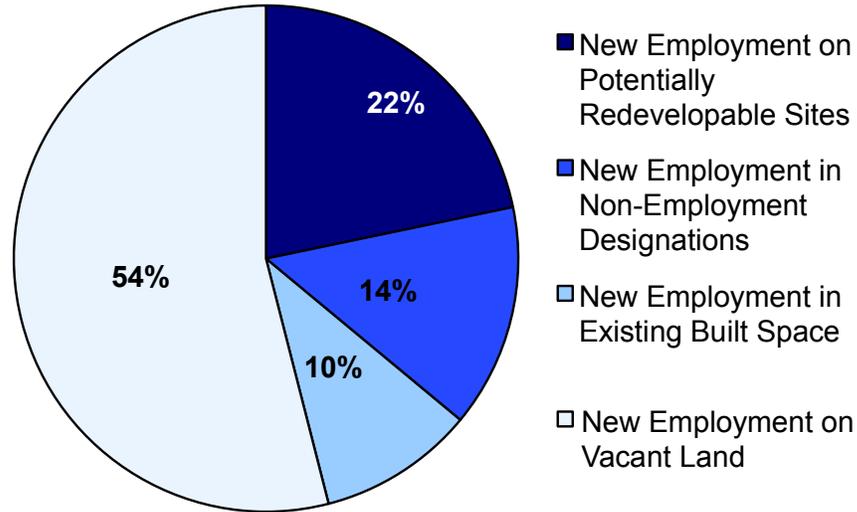
COMPARISON OF LAND CAPACITY AND DEMAND

This section presents an analysis of land availability and capacity for employment uses in Springfield. The key conclusions in this section are:

- (1) **The majority of employment growth in Springfield will not require vacant land.** The analysis concludes that that 46% of new employment would not require vacant land, consistent with the City's economic development strategies to encourage redevelopment, especially in Downtown and Glenwood. This portion of employment addresses the OAR 660-024-0050(4) requirement that the City demonstrate that some needs can reasonably be accommodated through by increasing the development capacity of land already inside the city prior to expanding the UGB. The City's Springfield 2030 Comprehensive Plan describes the specific policies the City will adopt to achieve this level of increased capacity through infill development and redevelopment. Those policies will be adopted as part of the City's overall UGB justification.
- (2) **Springfield will need employment land with characteristics that cannot be found within the existing UGB.** The City will need 7 sites with about 223 acres of industrial and other employment land, on sites five acres and larger that cannot be accommodated within the existing UGB.

Figure S-1 summarizes how Springfield will accommodate new employment based analysis in Chapter 5.

Figure S-1. Summary of Location of Employment Growth by Type of Land, Springfield UGB, 2010-2030



Source: ECONorthwest

Table S-2 shows a comparison of land supply and need in terms of sites by site size, based on the analysis of potential growth industries in Springfield in Chapter 4. The results show that Springfield has a deficit of two Industrial sites (both 20 acres and larger) and seven Commercial and Mixed Use sites (ranging in size from 2 to 5 acres and 20 acres and larger).

Table S-2. Comparison of vacant land supply and site needs, industrial and other employment land, Springfield UGB, 2010-2030

	Site Size (acres)				
	Less than 1	1 to 2	2 to 5	5 to 20	20 and Larger
Buildable Land Inventory					
Vacant					
Industrial	72	24	20	12	0
Commercial and Mixed Use	104	14	6	4	0
Potentially Redevelopable					
Industrial	122	28	31	6	1
Commercial and Mixed Use	305	20	15	0	0
Total Buildable Sites					
Industrial	194	52	51	18	1
Commercial and Mixed Use	409	34	21	4	0
Site Needs					
Needed sites					
Industrial	7	7	7	12	3
Commercial and Mixed Use	174	31	23	8	1
Surplus (deficit) of sites					
Industrial	187	45	44	6	-2
Commercial and Mixed Use	235	3	-2	-4	-1

Source: ECONorthwest.

Note: The redevelopable sites in Table 5-1 are assumed to increase employment capacity on the redeveloped sites. As discussed in Chapter 2, redevelopment means a net increase in employment capacity, rather than only the replacement of an old building with a newer building.

Converting from the site needs shown in Table S-2 to an estimate of land needs requires making assumptions about average site sizes needed in Springfield. The average site sizes in Table 5-2 are based on empirical analysis of the size of Industrial and Commercial taxlots with employment in Springfield. Table S-3 shows the average site size for needed sites in Springfield.

Table S-3. Average size of needed sites based on average sizes of sites with employment in Springfield, Springfield UGB

	Site Size (acres)				
	Less than 1	1 to 2	2 to 5	5 to 20	20 and Larger
Industrial	0.5	1.4	3.0	10.0	63.0
Commercial and Mixed Use	0.4	1.4	3.2	9.3	60.0

Source: ECONorthwest based on QCEW data

Note: Average site size for sites 20 acres and larger is rounded to the nearest acre.

Table S-4 shows sites needed (from Table S-2) and land need (based on number of sites needed in Table S-2 and average site size in Table S-3). The results show that Springfield has a deficit in the current UGB of the following land types for the 2010 to 2030 period:

- **Industrial land.** Springfield has a need for 126 acres of industrial land on two sites larger than 20 acres. In the context of this study,

industrial use means any use that would be allowed in an industrial land designation (e.g., campus industrial, light-medium industrial, light-medium industrial mixed use, heavy industrial, or special heavy industrial).

- **Commercial sites.** Springfield has a **need for 104 acres** of commercial land on 9 sites. Springfield's commercial site needs range from sites 2 to 5 acres in size to one site that is 60 acres in size. In the context of this study, commercial use means any use that would be allowed in a commercial land designation (e.g., commercial, commercial mixed use, employment mixed use).

Table S-4. Comparison of employment land supply and site needs, Springfield UGB, 2010-2030

	Site Size (acres)					Total
	Less than 1	1 to 2	2 to 5	5 to 20	20 and Larger	
Industrial						
Sites needed	none	none	none	none	2	2
Land need (acres)	none	none	none	none	126	126
Commercial and Mixed Use						
Sites needed	none	none	2	4	1	7
Land need (acres)	none	none	6	37	60	104
Total sites needed	none	none	2	4	3	9
Total acres needed	none	none	6	37	186	230

Source: ECONorthwest

The summary of land needs in Table S-4 shows Springfield's land need for all sites of all sizes. One of the City's economic development strategies is to encourage redevelopment, especially in Downtown and Glenwood. Table S-2 shows that 188 industrial sites and 340 commercial and mixed use sites would redevelop to address land needs over the 20-year period. In addition to this assumption about redevelopment, **Springfield concludes that all land needs on sites smaller than five acres would be accommodated through redevelopment.** The City had a deficit of two commercial and mixed use sites smaller than five acres, which would require six acres of land (Table S-4).

Table S-5 shows Springfield's employment land need, assuming that all site needs for sites smaller than five acres would be addressed through redevelopment. **Springfield has the need for approximately two industrial sites on 126 acres and five commercial and mixed use sites on about 97 acres** that cannot be accommodated within the existing UGB over the 2010 to 2030 period.

Table S-5. Employment site and land needs, Springfield UGB, 2010-2030

	Site Size (acres)			Total
	Less than 5	5 to 20	20 and Larger	
Industrial				
Sites needed	none	none	2	2
Land need (acres)	none	none	126	126
Commercial and Mixed Use				
Sites needed	none	4	1	5
Land need (acres)	none	37	60	97
Total sites needed	none	4	3	7
Total acres needed	none	37	186	223

Source: ECONorthwest

CHARACTERISTICS OF NEEDED SITES

The Goal 9 Administrative Rule (OAR 660-009) requires that jurisdictions describe the characteristics of needed sites (OAR 660-009-0025(1)). The Administrative Rule defines site characteristics as follows in OAR 660-009-0005(11):

(11) "Site Characteristics" means the attributes of a site necessary for a particular industrial or other employment use to operate. Site characteristics include, but are not limited to, a minimum acreage or site configuration including shape and topography, visibility, specific types or levels of public facilities, services or energy infrastructure, or proximity to a particular transportation or freight facility such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes.

The analysis of employment land needs in Springfield showed need for two industrial sites (both 20 acres and larger) and five commercial and mixed use sites (ranging in size from 5 to 20 acres and 20 acres and larger). The site characteristics for commercial and industrial sites are summarized in Table S-6.

Table S-6. Summary of characteristics of sites needed by target industries, Springfield

Type of site and target industries	Site Size	Topography	Transportation Access	Access to City Services
<p>Target Industries: Medical Equipment High-Tech Electronics and Manufacturing Recreational Equipment Furniture Manufacturing Specialty Food Processing Building Type: General Industrial Site Needs for: Manufacturing</p>	<p>Manufacturers similar to the target industries that needed sites larger than 5 acres, who considered locating in Oregon or in the Eugene-Springfield area, needed sites ranging in size from 10 acres to more than 100 acres. The size of sites needed by Springfield's target industries will vary by the size of building: 100,000 sq ft building will need a site of between 9-12 acres 200,000 sq ft building will need a site of between 18-24 acres 500,000 sq ft building will need a site of between 45- 60 acres The average size of existing sites with employment in Springfield (Table 5-2) is: 5-20 acre site: 10 acres 20+ acre site: 63 acres</p>	<p>The slope for manufacturing sites should be 5% or less. High-tech and Campus manufacturing can have a slope of 7% or less.</p>	<p>At the furthest, sites should be located within 15 miles or less of I-5 or a principal arterial road that is designated as a freight route. Typically, most businesses in Springfield locate within one-mile of I-5 or within about one-half a mile of a state highway.</p>	<p>Access to Springfield's municipal water and wastewater system, with a minimum pipeline size of 8 to 10 inches (varies by target industry).</p>
<p>Target Industries: High-Tech services Corporate Headquarters Biotech Professional and Technical Services Back Office Medical Services Building Type: Commercial and Other Site Needs for: Large Office Employers</p>	<p>Commercial office employers that needed sites larger than 5 acres, who considered locating in Oregon, needed sites ranging in size from 10 acres to 100 acres. The size of sites needed by Springfield's target industries will vary by the size of building: 50,000 sq ft building will need a site of between 4- 6 acres 100,000 sq ft building will need a site of between 8-12 acres 200,000 sq ft building will need a site of between 16-24 acres If a business park is developed to meet the site needs of these businesses, typical business park sizes in the Portland region are between about 30 and 75 acres. The average size of existing sites with employment in Springfield (Table 5-2) is: 5-20 acre site: 9.3 acres 20+ acre site: 60 acres</p>	<p>The slope for manufacturing sites should be 5% or less. High-tech and Campus manufacturing can have a slope of 7% or less.</p>	<p>At the furthest, sites should be located within 15 miles or less of I-5 or a principal arterial road. Typically, most businesses in Springfield locate within one-mile of I-5 or within about one-half a mile of a state highway. Sites should have access to mass transit within one-half mile.</p>	<p>Access to Springfield's municipal water and wastewater system, with a minimum pipeline size of 8 to 10 inches (varies by target industry).</p>

IMPLICATIONS

The analysis presented in the economic opportunities analysis has implications for Springfield's economic land needs.

- *Economic growth.* Decision makers and community members that participated in the economic opportunities analysis agreed that economic growth is desirable over the planning period. The employment forecast indicates Springfield will add 13,440 new employees between 2010 and 2030. The economic opportunities analysis assumes that Springfield will have employment growth in a wide variety of businesses, from services and retail for residents to industrial development to medical services. The City wants to diversify its economy and attract higher wage and professional jobs.
- *Buildable lands.* Springfield has 3,414 acres that are designated for industrial and other employment use. About two-thirds of the land designated for employment within Springfield's UGB is considered developed and is not expected to redevelop over the 20 year planning period. Less than 15% of this land is buildable, unconstrained land. The majority of buildable, unconstrained employment land in Springfield has existing development on it that is expected to redevelop over the planning period. Springfield has a lack of buildable large sites, with one buildable site 20 acres and larger and 22 buildable sites in the five to 20 acre size range.
- *Redevelopment potential.*² The analysis of potentially redevelopable land and need for employment land assumes that Springfield will have substantial redevelopment over the planning period. The analysis of potentially redevelopable land assumes that the employment capacity of redeveloped areas will increase, not simply that a new building will replace an old building. Consistent with City Council policies, the areas that are expected to have the most redevelopment are in Glenwood, especially along the Willamette Riverfront and Franklin/McVay corridor, and in the Downtown Urban Renewal District.

The City will need to make strategic investments that support redevelopment and continue supporting redevelopment through

² This study identifies land with redevelopment potential as land on which development has already occurred but on which, due to present or expected market forces, there exists the potential that existing development will be converted to more intensive uses (providing additional employment capacity) during the planning period.

City plans and policies. For example, redevelopment in the City's targeted Downtown and Glenwood areas will require substantial investments in public infrastructure to provide public facilities and to overcome the existing impediments to development, including parcel assembly issues.

- *Employment that will not require vacant land.* Springfield assumed that 46% of employment would not require vacant employment land.³ Springfield's assumptions about employment that will not require vacant land are as follows:
 - Fourteen percent of employment (1,918 employees) will locate in non-employment designations. These employees will include people with home occupations, working from home, and businesses that locate in residential or other non-employment designations.
 - Ten percent of new employment (1,344 employees) will locate in existing built space.
 - Twenty-one percent of new employment (2,921 employees) will locate on redevelopable sites. Table S-2 shows that Springfield assumes 188 industrial sites and 342 commercial and mixed use sites will redevelop over the planning period.
- *Need for large sites.* Springfield will be able to meet all employment land needs on sites five acres and smaller within the existing UGB, through redevelopment, infill development, and employment uses on non-employment land (e.g., home occupations). The employment land needs that may not be met within the UGB are for sites five acres and larger. The City has only one suitable site over 20 acres.

Availability of sites 20 acres and larger is important for attracting or growing large businesses, which are often trade-sector businesses. If the City does not have these large sites, there is little chance that the City will attract these types of businesses. While it may not be clear exactly what the business opportunities may be in ten to twenty years, it is clear that these businesses will not locate in Springfield if land is not available for development.

³ The estimate of 46% of new employment not requiring vacant land is based on the assumption that 1,918 employees will locate in non-employment designations, 1,344 employees will locate in existing built space, and 2,921 employees will locate on redevelopable sites. The total number of new employees not requiring new land is 6,183 employees, which is approximately 46% of the forecasted growth of 13,440 jobs.

- *Redesignation of Smaller Sites.* Springfield’s land deficit cannot be met through redesignating a surplus of small industrial- and commercial-designated sites, most of which are smaller than two acres. Map 2-3 shows that these sites are scattered throughout the City, generally along Main Street or in Mid- Springfield. There are few opportunities for assembly of a contiguous, unconstrained site with a configuration that makes it developable. These areas do not and are not expected to provide large sites for target employers that require large sites.

Even where small vacant sites are located adjacent to other small vacant sites, there are few places where a site larger than 5 acres could be assembled from small sites. There is probably no place where a 20-acre site could be assembled from small sites.

- *Site assembly.* Assembly of numerous small sites into 5 to 10 acre sites is difficult at best and often not feasible. Land assembly is difficult and often costly. Developers attempting land assembly often have difficulty assembling a site at a cost that makes development economically viable. When assembling land, developers often find that owners of key sites are not willing sellers, have unrealistic expectations of the value of their land, or cannot get agreement among multiple owners to sell the land. As a result, developers, especially developers of industrial buildings, typically choose to develop sites with one or two owners.
- *Need to expand the UGB to accommodate need for large sites.* Springfield’s need for large sites cannot be met within the UGB. Meeting this need for large sites for large employers requires the City to expand its UGB into areas with suitable sites. These areas will have relatively large, flat sites with little parcelization and few owners, where businesses will have access to I-5 or a State highway.
- *Short-term land supply.* Based on the Goal 9 definition of short-term land supply and criteria for “engineering feasibility,” the majority of inventoried commercial and industrial land supply within the Springfield UGB is part of the short-term land supply, assuming that funding is available to extend or increase capacity of infrastructure and urban services. The Goal 9 rule definition of short-term land supply does not account for land availability, such as whether the landowner is willing to sell it or the owner is willing to redevelop it. The Goal 9 rule definition of short-term land supply also does not account for needed site characteristics, such as site size. As a result, the City’s short-term land supply as defined by

Goal 9 may not be available and developers may have difficulty finding developable land with specific site characteristics.

Introduction

This report presents an Economic Opportunities Analysis (EOA) for the City of Springfield consistent with the requirements of statewide planning Goal 9 and the Goal 9 administrative rule (OAR 660-009). Goal 9 describes the EOA as “an analysis of the community's economic patterns, potentialities, strengths, and deficiencies as they relate to state and national trends” and states that “a principal determinant in planning for major industrial and commercial developments should be the comparative advantage of the region within which the developments would be located.”

BACKGROUND

In 2007, the Oregon Legislature passed House Bill 3337 that directed Springfield and Eugene to establish separate Urban Growth Boundaries (UGBs). The city started work on a key element of its new UGB in 2006 by initiating a residential buildable lands inventory and contracting ECONorthwest to conduct a Goal 10 housing needs analysis. Springfield’s UGB was acknowledged in 2011. The City concurrently prepared additional studies necessary to determine employment land needs – including an economic opportunities analysis (EOA) and an economic development strategy.

The project includes two key phases:

1. An inventory of commercial and industrial lands and a projection of the acreage needed to accommodate Springfield’s future commercial and industrial needs. This phase is called the economic opportunities analysis (EOA).
2. An analysis of alternative locations where the UGB might be expanded to accommodate the city’s future commercial, industrial, and residential needs – if the City identifies a deficiency of lands. This phase is called the alternatives analysis.

This report presents the results of the economic opportunities analysis, with the economic development strategy presented in Appendix D. ECONorthwest worked closely with City staff, a Technical Advisory Committee, and a Stakeholder Committee in preparing the Springfield Economic Opportunities Analysis. This report incorporates many comments provided by these groups. It is an update to the 2009 Draft EOA, designed to address questions and comments about the EOA raised

through public testimony, as well as update the EOA to address requirements of recent court decisions.

FRAMEWORK FOR ECONOMIC DEVELOPMENT PLANNING IN OREGON

The content of this report is designed to meet the requirements of Oregon Statewide Planning Goal 9 and the administrative rule that implements Goal 9 (OAR 660-009). The Land Conservation and Development Commission adopted amendments to this administrative rule in December 2005.⁴ The analysis in this report is designed to conform to the requirements for an Economic Opportunities Analysis in OAR 660-009 as amended.

1. *Economic Opportunities Analysis (OAR 660-009-0015)*. The Economic Opportunities Analysis (EOA) requires communities to identify the major categories of industrial or other employment uses that could reasonably be expected to locate or expand in the planning area based on information about national, state, regional, county, or local trends; identify the number of sites by type reasonably expected to be needed to accommodate projected employment growth based on the site characteristics typical of expected uses; include an inventory of vacant and developed lands within the planning area designated for industrial or other employment use; and estimate the types and amounts of industrial and other employment uses likely to occur in the planning area. Local governments are also encouraged to assess community economic development potential through a visioning or some other public input based process in conjunction with state agencies.
2. *Industrial and commercial development policies (OAR 660-009-0020)*. Cities with a population over 2,500 are required to develop commercial and industrial development policies based on the EOA. Local comprehensive plans must state the overall objectives for economic development in the planning area and identify categories or particular types of industrial and other employment uses desired by the community. Local comprehensive plans must also include policies that commit the city or county to designate an adequate number of employment sites of suitable sizes, types and locations. The plan must also include policies to provide necessary public facilities and transportation facilities for the planning area. Finally, cities within a Metropolitan Planning Organization (which includes

⁴ The amended OAR 660-009, along with a Goal 9 Rule Fact Sheet, are available from the Oregon Department of Land Conservation and Development at <http://www.oregon.gov/LCD/econdev.shtml>.

Springfield) must adopt policies that identify a competitive short-term supply of land for desired industrial and other employment uses as an economic development objective.

3. *Designation of lands for industrial and commercial uses (OAR 660-009-0025.* Cities and counties must adopt measures to implement policies adopted pursuant to OAR 660-009-0020. Appropriate implementation measures include amendments to plan and zone map designations, land use regulations, public facility plans, and transportation system plans. More specifically, plans must identify the approximate number, acreage and characteristics of sites needed to accommodate industrial and other employment uses to implement plan policies, and must designate serviceable land suitable to meet identified site needs.

Plans for cities and counties within a Metropolitan Planning Organization or cities and counties that adopt policies relating to the short-term supply of land must designate suitable land to respond to economic development opportunities as they arise.

This report is an Economic Opportunities Analysis, the first key element required by Goal 9. This EOA includes an analysis of national, state, regional, and county trends as well as an employment forecast that leads to identification of needed development sites. It also includes an inventory of buildable commercial and industrial land in Springfield.

ORGANIZATION OF THIS REPORT

The remainder of this report is organized as follows:

- **Chapter 2, Land Available for Industrial and Other Employment Uses** presents an inventory of industrial and other employment lands.
- **Chapter 3, Economic Trends and Factors Affecting Future Economic Growth in Springfield** summarizes historic economic trends that affect current and future economic conditions in Springfield. It also summarizes Springfield's comparative advantages formed by the mix of factors present in Springfield
- **Chapter 4, Land Demand and Site Needs in Springfield** presents the employment forecast for Springfield and an estimate of how much land is needed to accommodate the 20-year employment forecast. It also describes the types of sites that are needed to accommodate industries that are likely to locate or expand in Springfield.

- **Chapter 5, Implications** presents a comparison of land supply and site needs and discusses the implications of the Economic Opportunities Analysis.

This report also includes three appendices:

- **Appendix A, Review of National, State, Regional, County, and Local Trends** describes national, state, and local economic trends that will influence the regional economy. Appendix A presents detailed information about economic trends that may affect Springfield, which is summarized in Chapter 3.
- **Appendix B, Factors Affecting Future Economic Growth in Springfield** discusses the comparative advantages formed by the mix of factors present in Springfield. Springfield's comparative advantages are summarized in Chapter 3.
- **Appendix C, Employment Forecast and Site Needs for Industrial and Other Employment Uses** presents an employment forecast and analysis of needed sites for Springfield for the period 2010-2030 and is summarized in Chapter 4.
- **Appendix D, Economic Development Objectives and Implementation Strategies** presents objectives and strategies to implement the City's economic development goals. It will be used to guide development of land use policies to implement the City's economic development vision.

Land Available for Industrial and Other Employment Uses

The Springfield Commercial and Industrial Buildable Lands (CIBL) inventory is intended to identify lands within the Springfield urban Growth Boundary (UGB) that are suitable for development and can accommodate employment growth. This chapter addresses the requirements of OAR 660-009-0015(3) to inventory vacant and developed lands that are designated for industrial or other employment uses.

Buildable lands inventories are sometimes characterized as *supply* of land to accommodate growth. Population and employment growth drive *demand* for land. The amount of land needed depends, in part, on the density of development as well as assumptions about redevelopment and infill.

This chapter presents the CIBL inventory for the City of Springfield. The results are based on analysis of Geographic Information System data provided by the City of Springfield Public Works Department and the Lane Council of Governments. The buildable land inventory also used aerial orthophotographs and review by city staff for verification.

Some updates were made to this chapter as part of the 2015 update of the EOA. Text was added to clarify data and methodologies used in the BLI. The column titles were updated to clarify the results of the BLI in some tables. The results of the buildable lands inventory were not revised as part of this update. This update resulted in modifications to the narrative of this chapter, with the intent of clarifying the methods and results.

For the purpose of the buildable lands inventory, lands east of the Interstate 5 center line in the Metro UGB were considered to be in the Springfield portion of the UGB.⁵

ECO worked closely with City Staff, a Technical Advisory Committee, and a Stakeholder Committee during the development and review of the Springfield commercial and industrial buildable lands inventory (CIBL). ECO developed the inventory using the following steps:

⁵ Springfield did not have a separate UGB at the time this study was completed. The Springfield UGB was acknowledged in 2011.

- *Assemble and document datasets.* ECO identified data from the Regional Land Information Database (RLID) and GIS data from the City of Springfield and the Lane Council of Governments as primary datasets on which the inventory and analysis was built. RLID includes assessment and taxation data maintained by Lane County.
- *Preliminary analysis.* ECO conducted a preliminary analysis with the GIS and data tables selected for inclusion in the database. The purpose of this task was to work with City staff and the TAC to determine the optimal definitions and supporting methodology to base the final analysis and database structure.
- *Data processing and GIS analysis.* In this step ECO performed the GIS analysis and data processing steps necessary to populate the database. Table 2-1 shows plan designations that were included in the commercial and industrial buildable lands inventory. All of the designations included in the inventory allow employment outright. The inventory, however, includes several mixed use designations that allow both employment and housing. The inventory generally uses the 2004 Metro Plan designations with two exceptions: (1) Glenwood, where a 2005 plan amendment changed the designation on approximately 47 acres from Light Medium Industrial Mixed Use to Mixed Use; (2) the PeaceHealth site where land was redesignated from residential to designations that allow employment; and (3) the Marcola Meadows site that included a plan designation change from Campus Industrial to Medium Density Residential/Nodal Development, Mixed-Use Commercial/Nodal Development, and Community Commercial. The implication of these exceptions was to include land that would not have otherwise been included in the inventory. The intent of this step was to increase the accuracy of the inventory.

Table 2-1. Metro plan designations included in the Springfield commercial and industrial buildable lands inventory, 2008

Plan Designation	Allowed Land Uses (yes/no)			
	Commercial	Industrial	Residential	In CIBL?
Campus Industrial	yes	yes	no	yes
Commercial	yes	no	no	yes
Commercial Mixed Use	yes	no	yes	yes
Heavy Industrial	no	yes	no	yes
High Density Res Mixed Use	yes	no	yes	yes
Light Medium Industrial	no	yes	no	yes
Light Medium Industrial Mixed Use	no	yes	no	yes
Major Retail Center	yes	no	no	yes
Medium Density Res Mixed Use	yes	no	yes	yes
Mixed Use	yes	yes	yes	yes
Special Heavy Industrial	no	yes	no	yes

Note: Allowed land uses indicates which uses are allowed in each plan designation. The CIBL includes any plan designation that allows employment, including mixed use designations.

- Verification.* ECO used a multi-step verification process. The initial verification occurred as part of the preliminary analysis. This step included a staff-level review of preliminary database output (maps) showing the land base and plan designations. The second round of verification involved a “rapid visual assessment” of land classifications using GIS and recent aerial photos for this analysis. The rapid visual assessment involved reviewing classifications overlaid on 2005 aerial photographs to verify uses on the ground. ECO reviewed all tax lots included in the inventory using the rapid visual assessment methodology. The third round of verification involved city staff verifying the rapid visual assessment output. The draft inventory was then circulated for review by the TAC and the Stakeholder Committee. This review resulted in a number of changes which are reflected in the inventory as presented in this report.

In summary, ECO used a systematic process to complete the CIBL inventory that was intended to provide the greatest degree of accuracy possible.

DEFINITIONS

The first step in the buildable inventory was to develop working definitions and assumptions. ECO initially classified land using a rule-based methodology. The rules applied by ECO to classify land are described below. The accompanying maps show the results of the application of those rules, with some adjustments made based on review of 2004 aerial photos and building permit data.

ECO began the buildable lands analysis with a tax lot database provided by the City's GIS Staff. The inventory used tax lots as the unit of analysis because (1) it is a commonly accepted unit for land inventories, and (2) tax lots link directly to other data sets (e.g., assessment data, addresses, etc.) The tax lot database was current as of February 2008. The inventory builds from the tax lot-level database to estimates of buildable land by plan designation.

All of the methods, definitions, and assumptions used in the CIBL were reviewed by the CIBL Stakeholder Committee over the course of several meetings. The Committee made many suggestions that are reflected in the final set of methods, definitions, and assumptions used for the CIBL.⁶

⁶ Meetings with the CIBL Stakeholder Committee are documented in in Springfield planning file LRP 2007-00031 and on the City webpage <http://www.springfield-or.gov/dpw/2030Background.htm>

A key step in the buildable lands analysis was to classify each tax lot into a set of mutually exclusive categories. Table 2-2 shows the relationship between definitions used in this study and the definitions related to land inventories in OAR 660-009-0005.

Table 2-2 Relationship between land classification definitions used in the Springfield EOA and definitions in OAR 660-009-0005.

Land classification in EOA	Definition used in EOA	Related definition in OAR 660-009-0005	Implications
Vacant Land	Tax lots that have no structures or have buildings with very little value. For the purpose of this inventory, lands with improvement values under \$10,000 are considered.	(14) "Vacant Land" means a lot or parcel: (a) Equal to or larger than one half-acre not currently containing permanent buildings or improvements; or (b) Equal to or larger than five acres where less than one half-acre is occupied by permanent buildings or improvements.	Springfield included more land in the inventory than required by rule. The Stakeholder Committee believed it would provide a more accurate estimate of Total Land Supply as defined by OAR 660-009-0005(13).
Developed Land	Land that is developed at densities consistent with current zoning/plan designation and improvements that make it unlikely to redevelop during the analysis period.	(1) "Developed Land" means non-vacant land that is likely to be redeveloped during the planning period. The EOA separates the definition of developed and potentially redevelopable land.	Springfield uses a standard definition of developed—that is that the land has improvements and is committed to those uses for the planning period. The rule does not include a definition of "developed" in the standard context
Potentially Redevelopable Land	Land on which development has already occurred but on which, due to present or expected market forces, there exists the potential that existing development will be converted to <u>more intensive uses</u> (providing additional employment capacity) during the planning period. ⁷	EOA uses term "developed land" differently than OAR definition of "developed land" as "non-vacant land that is likely to be redeveloped during the planning period." Instead the EOA uses "potentially redevelopable" to classify non-vacant land that is likely to be redeveloped during the planning period.	This category corresponds to the definition used in OAR 660-009-0005(1)

⁷ While Springfield expects many buildings and sites of all types to be re-used, re-purposed, revitalized and renovated throughout the city over the planning period, for the purposes of analyzing the capacity of the land base to absorb a portion of employment growth, only redevelopment that increases capacity for accommodating additional employment is identified as redevelopment in this analysis.

The inventory assigns only one land classification (e.g., vacant, developed, or potentially redevelopable) for each tax lot. Each tax lots in the UGB is classified into one of the following categories:

Identifying Vacant Land

The City's definition of vacant land is more inclusive than what statewide planning policy requires. The implication of using a more inclusive definition are that more land was considered available in the inventory than would be if the state definitions were used.

- *Vacant land.* Tax lots that have no structures or have buildings with very little value. For the purpose of this inventory, lands with improvement values under \$10,000⁸ are considered vacant (not including lands that are identified as having mobile homes).⁹ Note that this definition is considerably more inclusive than what is required by OAR 660-009-0005(14). It includes all lots or parcels that are less than one half-acre and did not automatically classify lots between 0.5 and 5.0 acres as developed if they had pre-existing development. Lots in that category were visually inspected to make a determination of whether they should be classified as developed or vacant.
- *Developed land.* Land that is developed at densities consistent with current zoning/plan designation and improvements that make it unlikely to redevelop during the analysis period. Lands not classified as vacant, potentially redevelopable, or public are considered developed.¹⁰ Note that OAR 660-009-0005(1) uses the following definition: (1) "Developed Land" means non-vacant land that is likely to be redeveloped during the planning period. This study defines developed land as developed and defines land "likely to be redeveloped" as potentially redevelopable. Thus, the definition of developed land used for the CIBL is different (e.g., more inclusive) than the definition in the administrative rule. For purposes of the CIBL, developed land is considered committed during the 20-year period and unavailable for redevelopment.

Lands in public ownership were generally considered unavailable for development unless identified by City staff as being available for development at some time during the 20-year planning period. This includes uses such as electrical substations, parks, and private

⁸ Improvement values were from 2008 Lane County Assessment and Taxation data and reflect the County's estimate of the market value of improvements.

⁹ Note that this definition is more inclusive than what statewide planning policy requires. OAR 600-009-0005(14) provides the following definition: "Vacant Land" means a lot or parcel: (a) Equal to or larger than one half-acre not currently containing permanent buildings or improvements; or (b) Equal to or larger than five acres where less than one half-acre is occupied by permanent buildings or improvements. The implication of using a more inclusive definition are that more land was considered available in the inventory than would be if the state definitions were used.

¹⁰ Note that OAR 660-009-0005(1) uses the following definition: (1) "Developed Land" means non-vacant land that is likely to be redeveloped during the planning period. This study defines developed land as developed and defines land "likely to be redeveloped" as potentially redevelopable.

cemeteries. Lands in Federal, State, County, or City ownership were also considered committed.

- *Potentially Redevelopable land.* Land on which development has already occurred but on which, due to present or expected market forces, there exists the potential that existing development will be converted to more intensive uses during the planning period.¹¹

While Springfield expects many buildings and sites of all types to be re-used, re-purposed, revitalized and renovated throughout the city over the planning period, for the purposes of analyzing the capacity of the land base to absorb a portion of employment growth, only redevelopment that increases capacity for accommodating additional employment is a factor in this analysis.

Potentially redevelopable land is a subset of developed land that was identified using improvement to land value ratios and building coverage ratios. For the purpose of the CIBL, “potentially redevelopable” land corresponds with the definition of “developed land” as stated in OAR 660-009-0005(1) as described in Table 2-2. This study included a detailed evaluation of developed land to determine its redevelopment potential. Lands that were determined to be potentially redevelopable were classified as such. Redevelopment potential is discussed in more detail later in this chapter (See page 27).

The inventory assigns only one land classification (e.g., vacant, developed, or potentially redevelopable) for each tax lot. The land classifications result in identification of lands that are vacant or potentially redevelopable. The inventory includes all lands within the Springfield UGB. Map 2-1 shows lands by plan designation within the Springfield UGB.

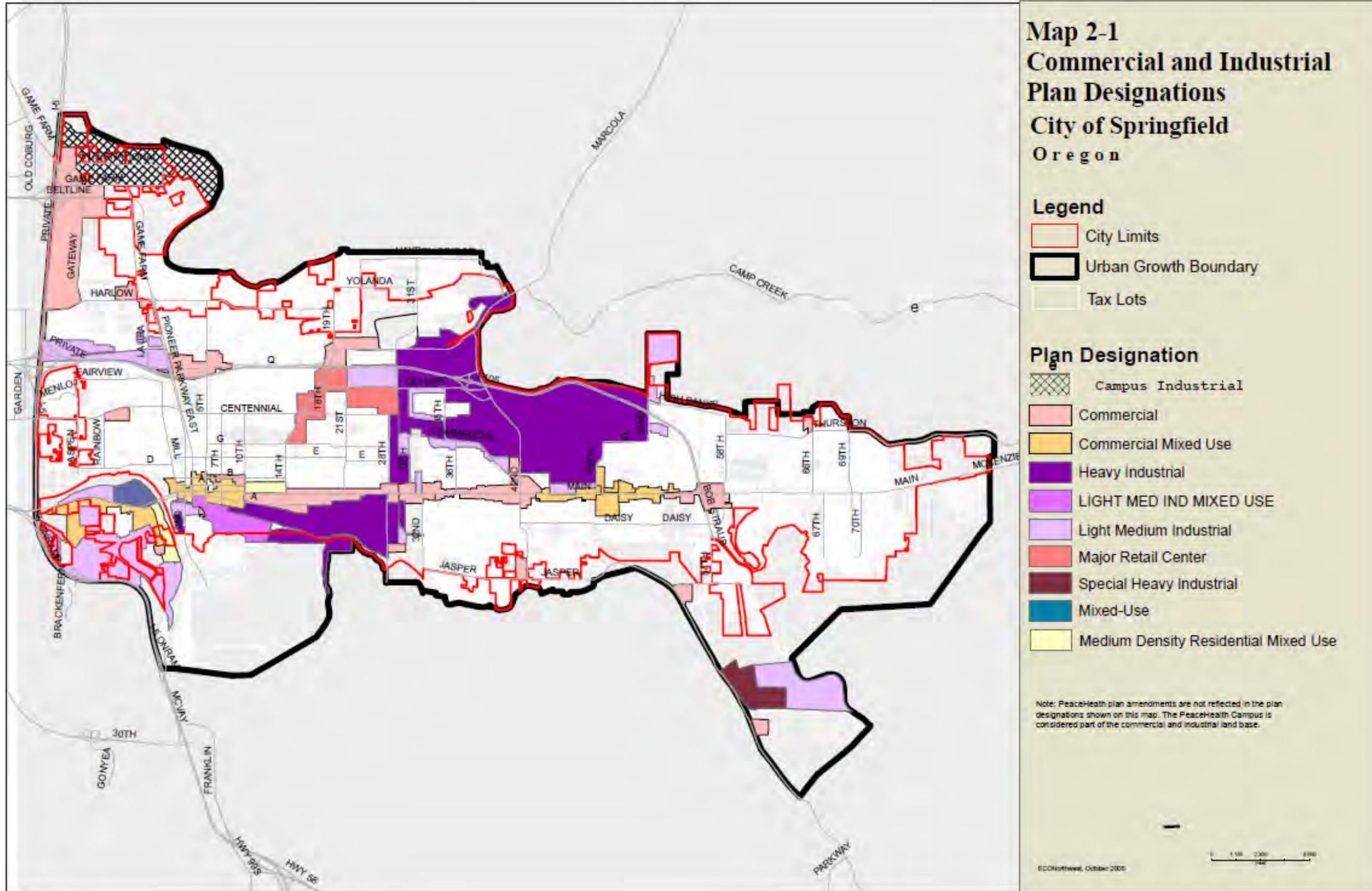
ECONorthwest used a systematic process to develop and review Springfield’s Commercial and Industrial land inventory. Processing and analyzing data from the Lane Council of Governments (LCOG) land use database (a database that inventories land uses at the sub-tax lot level), ECONorthwest identified the developed or unsuitable portions of tax lots. Areas of partially vacant tax lots with development were included in the “developed acres” category and remainders were considered “suitable”¹²

¹¹ This definition is based on the definition in OAR 660-009-0005(1).

¹² OAR 660-009-0005(12) defines “suitable” land as “serviceable land designated for industrial or other employment use that provides, or can be expected to provide the appropriate site characteristics for the proposed use.”

(unless they had absolute constraints). The inventory also deducted the “absolute constraints” that make land unsuitable for employment uses: wetlands (as identified in Springfield’s local wetland inventory), floodways, slopes over 15%, and riparian resource areas. Each of these constraints was available in a GIS format. The four constraints layers were “dissolved” together to create a single “absolute” constrained layer. This was done to avoid double counting since some constraints (e.g., floodways and wetlands) occur in the same place. The combined constraints layer was then used to calculate the portion of the lot that was constrained and therefore unsuitable for development.

Map 2-1 Plan Designation



CONSTRAINTS

Constraints are factors that preclude land development or affect the desirability of land for development. OAR 660-009-0005(2) provides the following definition of “development constraints:”

“Development Constraints” means factors that temporarily or permanently limit or prevent the use of land for economic development. Development constraints include, but are not limited to, wetlands, environmentally sensitive areas such as habitat, environmental contamination, slope, topography, cultural and archeological resources, infrastructure deficiencies, parcel fragmentation, or natural hazard areas.

Thus, the Administrative Rule provides a broad definition of constraints and leaves discretion for local governments in the application of the definition. Absolute constraints¹³ were deducted from the buildable portion of lots as they were determined to be factors that temporarily or permanently limit or prevent the use of land for economic development as defined in OAR 660-009-0005(2). For the purpose of this study, the following factors are considered **absolute development constraints** which make employment land unsuitable for development:¹⁴

- Wetlands – Source: City of Springfield Local Wetland Inventory. File used: wet_lwi.shp, accessed 2008
- Floodway – Source: Army Corps of Engineers digital “FIRM” maps. File used: fld_way.shp, accessed 2008
- Slopes over 15% - Source: 10 meter digital elevation model (DEM). File used: slopes_over_15.shp, accessed 2008
- Riparian resource areas – Source: City of Springfield. File used: Riparian_resource_areas.shp, accessed 2008

The following factors are **partial development constraints**. Partial constraints are factors that may create difficulties in development, but do not preclude development. Partial constraints were not deducted from the inventory. Land with these constraints is classified as “constrained” on employment land. Development can occur on “constrained” land and no deductions were made from the inventory for these factors.¹⁵

¹³ The subset of constraints to be considered “absolute constraints” for the purposes of this inventory and analysis were determined through ECONorthwest’s discussions with staff, the TAC, Stakeholder Committee, Planning Commission and City Council.

¹⁴ Each of these files were provided to ECONorthwest by the City in 2008.

¹⁵ Each of these files were provided to ECONorthwest by the City in 2008.

- Floodplain – Source: Army Corps of Engineers digital “FIRM” maps. File used: lane_dfirm.shp, accessed 2008
- Willamette River Greenway – Source: Lane Council of Governments. File used: Greenway_10m_20080303.shp, accessed 2008
- BPA Easements – Source: Bonneville Power Administration. File used: bparow_lane.shp, accessed 2008

The inventory summary that follows addresses “absolute” and “partial” constraints separately and summarizes lands as either “unbuildable acres” (e.g., no development may occur per “development constraints” as defined by OAR 660-009-0005(2)) or “constrained acres” (e.g., one or more constraints are present but those constraints do not preclude development). Portions of individual tax lots can be in one or more of the following categories: “unconstrained,” “constrained,” or “unbuildable” (e.g., they are not suitable for development).

Figure 2-1 shows the framework for constraint and classification used in buildable land inventory. The framework has two dimensions: development status (indicated by the presence or absence of improvements) and constraining conditions. Lands with constraints can be prohibitively constrained by commitment to a specific use (e.g., streets or parks) or protected (e.g., wetlands) or partially constrained. Lands with prohibitive constraints have no development capacity; those that are partially constrained have development capacity.

On the dimension of developments status (presence of improvements), developable lands (which can be thought of as vacant lands) have capacity; developed lands generally do not have capacity, but some may have redevelopment capacity. In short, redevelopment can be thought of as a subset of developed land.

Figure 2-1. Framework for land and constraint classification in a buildable land inventory

		Presence of Improvements	
		Developable	Developed
Constraining Conditions	Prohibitively Constrained	No capacity	
	Partially Constrained	Full capacity	Potential redevelopment capacity
	Unconstrained	Full capacity	

Constraints are one element of land suitability. Throughout this chapter, the following terms are used to refer to the status of employment land: suitable and unsuitable. These terms are defined as follows:

- "Suitable" means serviceable land designated for industrial or other employment use that provides, or can be expected to provide the appropriate site characteristics for the proposed use. (this definition is from OAR 660-009-0005(12))
- "Unsuitable" is land with absolute constraints.

RESULTS OF THE BUILDABLE LANDS INVENTORY

LAND BASE

The first step in the CIBL inventory was to determine the land base. This step was necessary because the inventory only covers a subset of land in the Springfield UGB (lands that accommodate employment). The land base is the subset of tax lots that fall within the plan designations included in the CIBL (see Table 2-1).

Table 2-3 shows acres within the Springfield UGB and city limits in 2008. According to the City GIS data, Springfield has about 14,603 acres within its UGB. Of the 14,603 acres, 12,139 acres (about 83%) are in tax lots. Land not in tax lots is primarily in streets and waterways. Springfield has about 9,958 acres within its City Limits; of these 8,060 acres (about 81% of total acres in the City Limit) are in tax lots. Additionally, the City has about 4,645 acres between the City Limits and Urban Growth Boundary (the UGA); of this about 4,079 acres are in tax lots.

Table 2-3. Acres in Springfield UGB and City Limit, 2008

Area	Tax Lots	Total Acres	Percent	
			Acres in Tax Lots	in Tax Lots
City Limits	19,477	9,958	8,060	81%
Urban Growth Area	3,150	4,645	4,079	88%
Total	22,627	14,603	12,139	83%

Source: City of Springfield GIS data; analysis by ECONorthwest

Note: Urban Growth Area is the unincorporated area between the City Limits and Urban Growth Boundary

Table 2-3 summarizes all land in the Springfield UGB. The next step was to identify the commercial and industrial land base (e.g., lands with plan designations that allow employment or “employment lands”). The land base includes traditional commercial and industrial designations, as well as mixed-use designations. Table 2-1 provides a list of plan designations included in the land base. Note that not all of the land in mixed-use designations will be used for employment. While mixed-use land can be used for the range of allowed uses, the CIBL inventory assumes that the mixed-use sites are available as employment sites consistent with their size.

Table 2-4 shows that about 3,415 acres within the Springfield UGB are included in the commercial and industrial land base. Thus, about 28% of land within the Springfield UGB is included in the Commercial and Industrial land base. The database includes all land in tax lots that have any portion that is in a commercial or industrial plan designation.

Table 2-4. Lands designated for commercial and industrial uses, Springfield UGB, 2008

Area	Value
Springfield UGB	
Number of Tax Lots	22,627
Acres in Tax Lots	12,139
Springfield CIBL	
Tax Lots in Employment Designations	2,104
Acres in Land Base in Employment Designations	3,415

Source: analysis by ECONorthwest

Table 2-5 summarizes acres by plan designation for employment lands within the Springfield UGB. Of lands designated for employment, about 65% (2,203 acres) are in industrial designations, 21% (716 acres) are in commercial designations, and 14% (495 acres) are in mixed use designations. .

Table 2-5. Acres by employment plan designation, Springfield UGB, 2008

Plan Designation	Total Acres	
	Tax Lots	in Tax Lots
Industrial		
Campus Industrial	43	352
Light Medium Industrial	375	541
Heavy Industrial	250	1,163
Special Heavy Industrial	5	147
Subtotal	673	2,203
Commercial		
Commercial	731	570
Community Commercial	4	30
Major Retail Center	119	116
Subtotal	854	716
Mixed Use		
Commercial Mixed Use	430	222
Light Medium Industrial Mixed Use	19	116
Medium Density Res Mixed	64	34
Mixed Use	64	123
Subtotal	577	495
Total	2,104	3,415

Source: City of Springfield GIS data; analysis by ECONorthwest
Note: Totals may be off by up to one acre due to rounding.

Table 2-6 shows acres by classification and constraint status for the Springfield UGB in 2008. Analysis by constraint status (the table columns) shows that about 2,040 acres are classified as developed (e.g., unavailable for development), 543 were classified as vacant. Not all vacant lands are

available for development – the inventory identified 189 unbuildable acres on vacant tax lots, leaving 355 acres of vacant, Suitable land.

The inventory also includes two sites with approved master plans: Riverbend and Marcola Meadows. These sites have master plans that approve a specific amount of employment. The CIBL only inventoried the portion of these sites that are approved for employment uses.

The inventory identified 669 acres that are *potentially redevelopable* based on the criteria described in the definitions section. All of these lands have existing improvements, but the value or character of the improvements suggests redevelopment potential. Of lands with redevelopment potential, 88 acres are unsuitable and the remaining 581 acres are buildable (e.g., they have redevelopment potential).

Table 2-6. Acres by classification, Springfield UGB, 2008

Classification	Tax Lots	Acres in Tax Lots	Developed Acres	Unsuitable Acres (Absolute Constraints)	Suitable Acres		
					Constrained Suitable Acres (Partial Constraints)	Unconstrained Suitable Acres	Total Suitable Acres
Developed	1,295	2,040	1,711	329	0	0	0
Master Plan	18	163	0	2	0	161	161
Potentially Redevelopable	535	669	na	88	37	544	581
Vacant	256	543	0	189	76	279	355
Total	2,104	3,415	1,710	608	112	985	1,097

Source: City of Springfield data; analysis by ECONorthwest

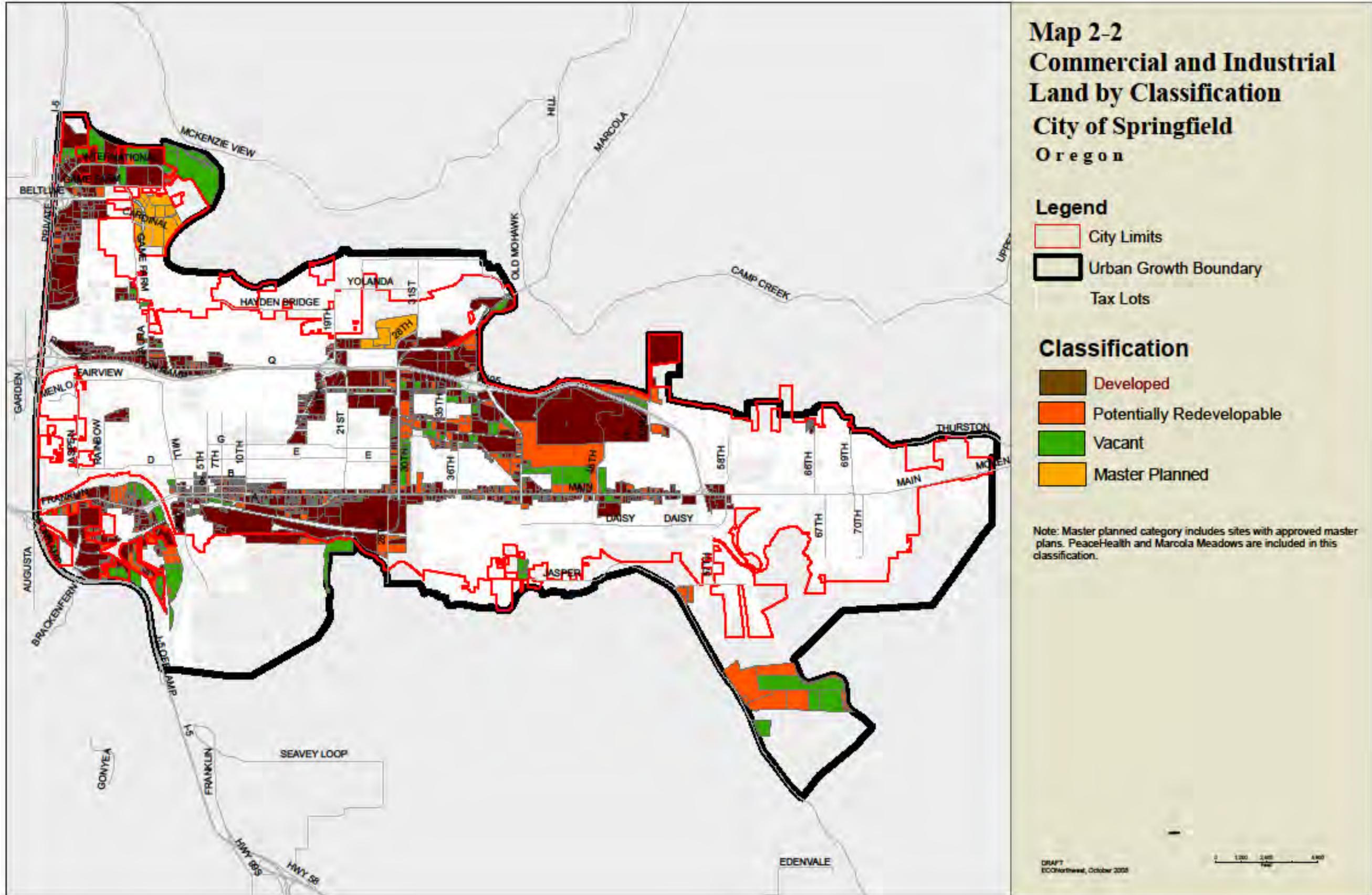
Note: Totals may be off by up to one acre due to rounding.

Note: The 2015 update to the EOA did not update the buildable land analysis. The changes in tables in Chapter 2 are clarifications of column titles.

Note: The CIBL only inventoried the portion of the master planned sites that are approved for employment uses.

Map 2-2 shows land by classification.

Map 2-2. Land by Classification, Springfield UGB



VACANT¹⁶ SUITABLE AND POTENTIALLY REDEVELOPABLE LAND

The next step in the land inventory is to deduct portions of vacant tax lots that are unavailable for development. Areas unavailable for development fall into two categories: (1) developed areas of partially vacant tax lots, and (2) areas with absolute development constraints (areas with steep slopes, floodway, riparian resource areas, or wetlands).

Table 2-7 shows vacant land by development and constraint status. The data show that about 189 acres within vacant tax lots have absolute development constraints, making them unsuitable, leaving about 355 vacant suitable acres (76 partially constrained and 279 unconstrained acres) within the UGB. About 88 acres of potentially redevelopable and suitable land has absolute development constraints, making them unsuitable, leaving about 581 potentially redevelopable and suitable acres (37 partially constrained and 544 unconstrained acres) within the UGB.

Table 2-7. Vacant and potentially redevelopable land by constraint status, Springfield UGB, 2008

Classification	Tax Lots	Acres in Tax Lots	Developed Acres	Unsuitable Acres (Absolute Constraints)	Suitable Acres		
					Constrained Suitable Acres (Partial Constraints)	Unconstrained Suitable Acres	Total Suitable Acres
Potentially Redevelopable	535	669	na	88	37	544	581
Vacant	256	543	0	189	76	279	355
Total	791	1,212	1,710	277	112	823	935

Source: City of Springfield GIS data; analysis by ECONorthwest

Note: Totals may be off by up to one acre due to rounding.

Note: The 2015 update to the EOA did not update the buildable land analysis. The changes to the table above were clarifications of column titles.

Table 2-8 shows vacant land by plan designation. Map 2-3 shows the location of suitable vacant land by plan designation. Map 2-4 shows vacant land with absolute constraints that are unsuitable and Map 2-5 shows suitable vacant land with partial constraints.

¹⁶ “Vacant” is defined in Chapter 2 of this document as “Tax lots that have no structures or have buildings with very little value. For the purposes of this inventory, lands with improvement values under \$10,000 (2008 Lane County Assessment and Taxation Data) are considered vacant (not including lands that are identified as having mobile homes).” This definition of “vacant” is more inclusive than what OAR 600-009-0005(14) requires, with the result that Springfield’s inventory includes more available land in the inventory than it would if the OAR600-009-0005(14) definition is used.

Table 2-8. Vacant land by Plan Designation, Springfield UGB, 2008

Plan Designation	Tax Lots	Acres in Tax Lots	Unsuitable Acres (Absolute Constraints)	Suitable Land			
				Constrained Suitable Acres(Partial Constraints)	Unconstrained Suitable Acres	Total Suitable Acres	
VACANT LAND							
Industrial							
Campus Industrial	14	131	77	40	14	54	
Light Medium Industrial	65	124	33	17	74	90	
Heavy Industrial	48	133	32	3	98	101	
Special Heavy Industrial	1	48	39	1	8	9	
Subtotal	128	435	181	61	194	255	
Commercial							
Commercial	71	51	3	3	45	49	
Community Commercial						0	
Major Retail Center	11	6	0	0	5	6	
Subtotal	82	57	3	3	51	54	
Mixed Use							
Commercial Mixed Use	27	28	2	2	24	26	
Light Medium Industrial Mixed Use						0	
Medium Density Res Mixed	7	2	0	1	1	2	
Mixed Use	12	21	3	9	9	18	
Subtotal	46	51	5	11	34	46	
Total	256	543	189	76	279	355	

Source: City of Springfield GIS data; analysis by ECONorthwest

Note: Totals may be off by up to one acre due to rounding.

Note: The 2015 update to the EOA did not update the buildable land analysis. The changes to the table above were clarifications of column titles.

Table 2-9 shows vacant land by plan designation and by parcel size.¹⁷ This analysis is useful in that it shows the distribution of vacant land by parcel size, which allows an evaluation of whether a sufficient mix of parcel sizes is available or not. The distribution of buildable land by parcel size varies by plan designation, with the results showing the City has no vacant tax lots 20 acres or larger. Parcel size is an important element in assessing whether the land supply meets needed site characteristics as defined by OAR 660-009-0005(11).

Table 2-9. Suitable acres in vacant tax lots by plan designation and parcel size, Springfield UGB, 2008

Plan Designation	Lot Size (Suitable Acres)								Total	
	< 0.25	0.25 - 0.49	0.50 - 0.99	1.00 - 1.99	2.00 - 4.99	5.00 - 9.99	10.00 - 19.99	20.00 - 50.00		50+
Total Acres										
Industrial										
Campus Industrial	0.2	0.3	0.0	4.7	18.6	19.7	10.8	0.0	0.0	54.3
Light Medium Industrial	3.5	5.2	9.7	15.3	20.7	6.1	30.0	0.0	0.0	90.5
Heavy Industrial	1.0	2.4	8.8	14.7	29.3	19.0	25.8	0.0	0.0	101.0
Special Heavy Industrial	0.0	0.0	0.0	0.0	0.0	9.1	0.0	0.0	0.0	9.1
Subtotal	4.7	7.9	18.5	34.6	68.6	53.9	66.6	0.0	0.0	254.8
Commercial										
Commercial	4.4	6.4	10.8	7.5	6.5	13.0	0.0	0.0	0.0	48.6
Community Commercial										
Major Retail Center	0.7	1.4	1.8	1.7	0.0	0.0	0.0	0.0	0.0	5.6
Subtotal	5.0	7.8	12.6	9.3	6.5	13.0	0.0	0.0	0.0	54.1
Mixed Use										
Commercial Mixed Use	1.2	1.3	1.9	5.4	7.6	8.5	0.0	0.0	0.0	25.9
Light Medium Industrial Mixed Use										
Medium Density Res Mixed	0.5	0.6	0.6	0.0	0.0	0.0	0.0	0.0	0.0	1.7
Mixed Use	0.5	0.3	0.0	4.9	7.2	5.2	0.0	0.0	0.0	18.0
Subtotal	2.2	2.2	2.5	10.3	14.8	13.6	0.0	0.0	0.0	45.6
Total	11.9	17.9	33.6	54.1	89.9	80.5	66.6	0.0	0.0	354.5
Number of Tax Lots										
Industrial										
Campus Industrial	1	1	0	3	5	3	1	0	0	14
Light Medium Industrial	19	13	12	11	7	1	2	0	0	65
Heavy Industrial	8	6	12	10	8	2	2	0	0	48
Special Heavy Industrial	0	0	0	0	0	1	0	0	0	1
Subtotal	28	20	24	24	20	7	5	0	0	128
Commercial										
Commercial	29	17	16	5	2	2	0	0	0	71
Community Commercial										
Major Retail Center	4	4	2	1	0	0	0	0	0	11
Subtotal	33	21	18	6	2	2	0	0	0	82
Mixed Use										
Commercial Mixed Use	12	5	3	4	2	1	0	0	0	27
Light Medium Industrial Mixed Use										
Medium Density Res Mixed	4	2	1	0	0	0	0	0	0	7
Mixed Use	4	1	0	4	2	1	0	0	0	12
Subtotal	20	8	4	8	4	2	0	0	0	46
Total	81	49	46	38	26	11	5	0	0	256

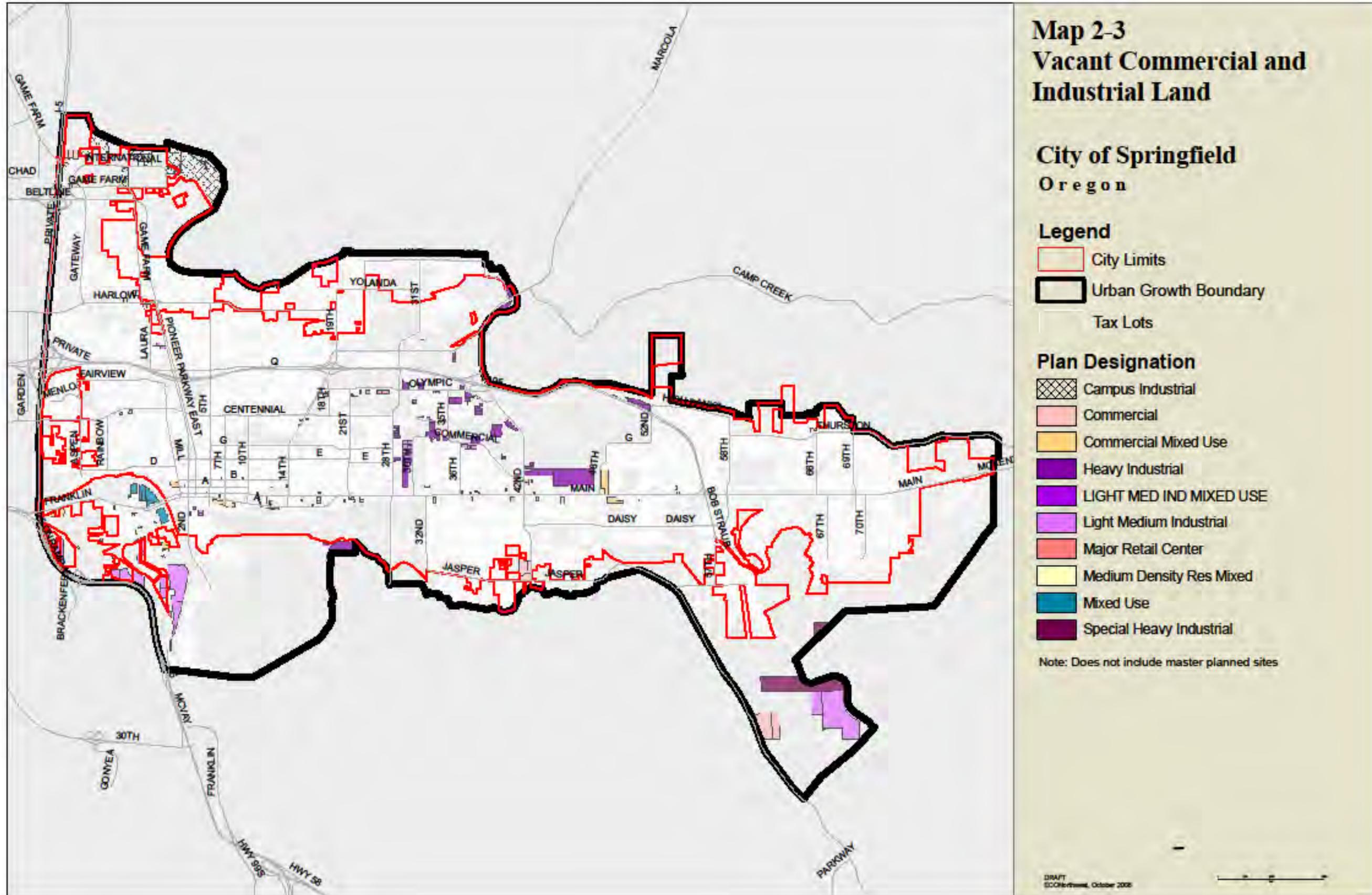
Source: City of Springfield GIS data; analysis by ECONorthwest

Note: Buildable acres includes "constrained" acres and "unconstrained" acres

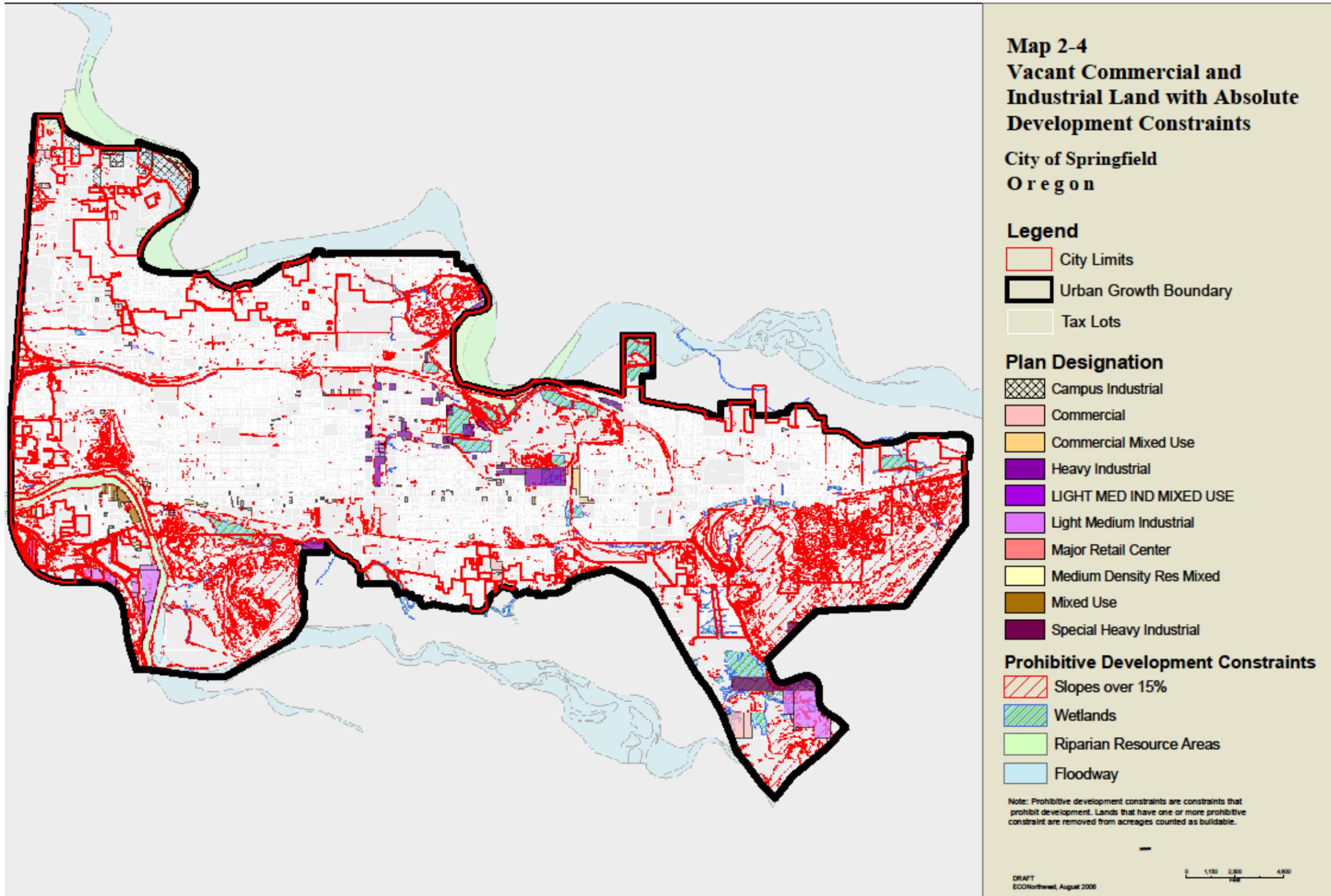
Note: Acres may not sum to tenths due to rounding.

¹⁷ The table shows total acres in vacant tax lots (constraints are not netted out)

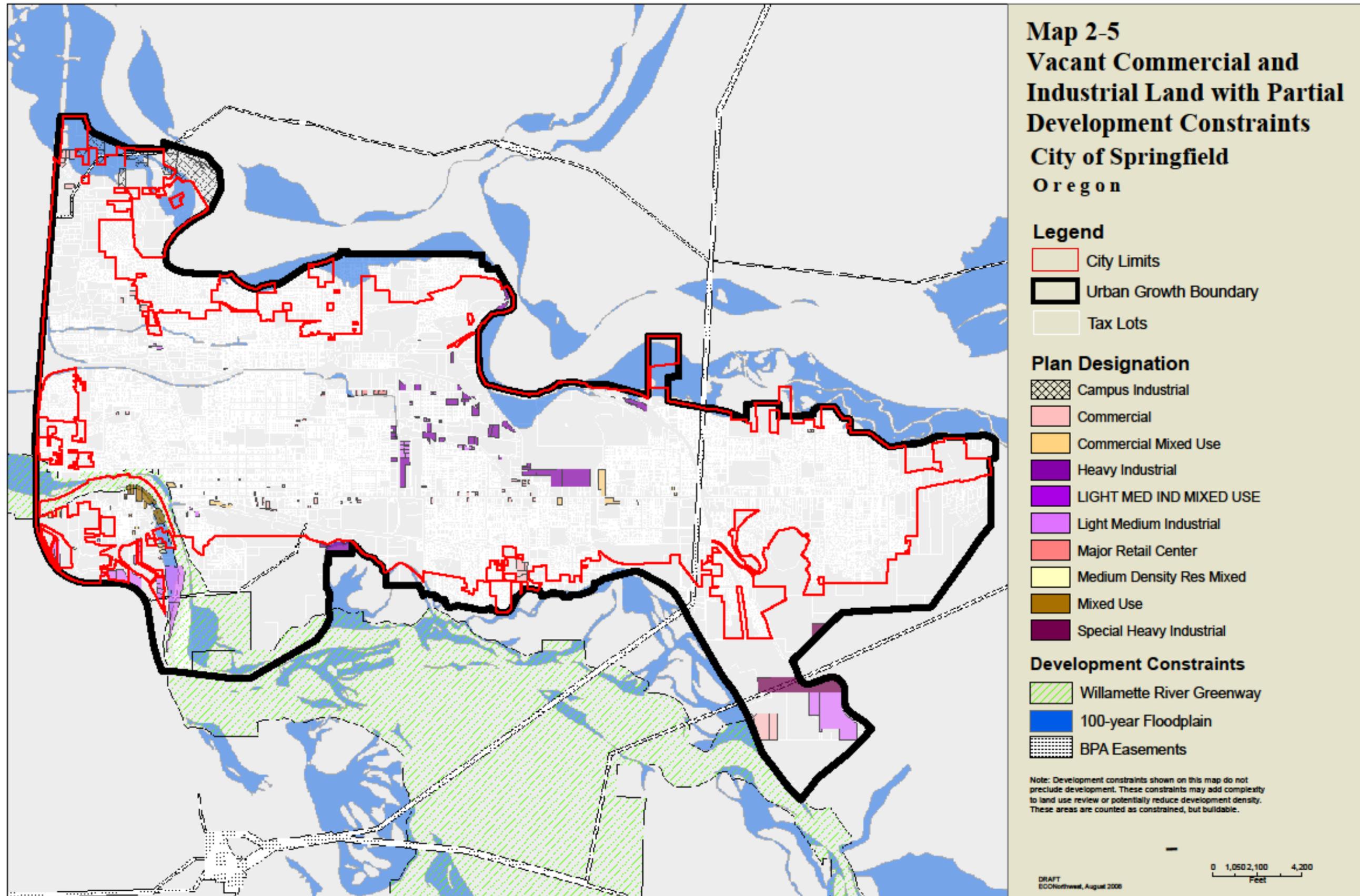
Map 2-3. Vacant Commercial and Industrial Land, City of Springfield



Map 2-4. Vacant Commercial and Industrial Land with Absolute Development Constraints, City of Springfield



Map 2-5. Vacant Lands with development constraints



CAPACITY TO ACCOMODATE EMPLOYMENT GROWTH THROUGH REDEVELOPMENT

For the purpose of this study, we define redevelopment in the context of the Goal 9 Administrative Rule. OAR 660-009-0005(1) defines developed land (redevelopment) as follows:

(1) "Developed Land" means non-vacant land that is likely to be redeveloped during the planning period.

The key components of this definition are “non-vacant” and “likely to be redeveloped.” Thus, any non-vacant land could be considered redevelopable, but only land that is “likely to be redeveloped” are required to be considered. Statewide planning statutes and administrative rules do not provide any guidance on how to determine what land is “likely to be redeveloped.”

Moreover, not all redevelopment is relevant to a buildable land inventory; only redevelopment that adds capacity for more employment is relevant in the context of Springfield’s commercial and industrial buildable lands inventory. An operational definition of redevelopment that would apply to both residential and employment lands in the context of the statewide planning program is:

Redevelopment is development that occurs on a tax lot that creates more employment space or capacity than the current use, and thus an increase in density on the tax lot.

For the purpose of this study, redevelopment must add capacity for it to be relevant to the buildable lands inventory.

IDENTIFICATION OF POTENTIALLY REDEVELOPABLE LAND

Redevelopment potential addresses land that is classified as developed that *may* redevelop during the planning period (e.g., potentially redevelopable land as defined for the purpose of the Springfield CIBL).¹⁸ While many methods exist to identify redevelopment potential, a common indicator is improvement to land value ratio. Different studies use different improvement to land value ratio thresholds.

Redevelopment potential can be thought of as a continuum – from more redevelopment potential to less redevelopment potential. The factors that

¹⁸ This study identifies land with redevelopment potential as land on which development has already occurred but on which, due to present or expected market forces, there exists the potential that existing development will be converted to more intensive uses (providing additional employment capacity) during the planning period.

affect redevelopment are complicated and include location, surrounding uses, current use, land and improvement values and other factors. To facilitate a discussion with the CIBL advisory committees about redevelopment, we established a set of three increasingly inclusive criteria: improvement-to-land value ratio, lot coverage, and amount of employment on the site.

In the context of the Springfield commercial and industrial buildable lands inventory, redevelopment potential addresses land that was initially classified as developed that may redevelop during the planning period. While many methods exist to identify redevelopment potential, a common indicator is improvement to land value ratio. A threshold used in some studies is an improvement to land value ratio of 1:1. Not all, or even a majority of parcels that meet this criterion for redevelopment potential will be assumed to redevelop during the planning period.

The factors that affect redevelopability are many, but the economics are pretty straightforward. Redevelopment occurs when achievable rents exceed the current return on investment of the land and improvements. The reality, of course, is much more complicated. One way to think about the market for land is “highest and best use,” which is a function of:

1. Achievable Pricing – Given the product type and location, what lease rates or sales prices are achievable?
2. Entitlements – What do local regulations allow to be built?
3. Development Cost – What is the cost to build the range of product types allowed (entitled) at that location?
4. Financing – What is the cost of capital, as well as the desired returns necessary to induce development of that form?

In our many conversations with commercial realtors and developers for this and other studies, the conclusion has been consistent: it is very difficult to develop reliable models of redevelopment potential. The factors are complicated and are location and time specific. Moreover, public policy can play a significant role in facilitating redevelopment.

To identify lands with redevelopment potential, ECO analyzed improvement to land value ratios and building coverage on tax lots. Tax lots were classified using the following criteria:

Category	Criteria
Higher Redevelopment Potential	Improvement to land value ratio $\leq 0.3:1.0$
Moderate Redevelopment Potential	Building coverage $< 10\%$ of total lot area and improvement value $\leq 0.3:1.0$
Lower Redevelopment Potential	Building coverage $< 20\%$ of total lot area and improvement value $\geq 0.3:1.0$ and $\leq 0.5:1.0$

The criteria above were used in combination with employment data to identify a reasonable threshold assumption to use for redevelopment.

Table 2-10 shows the results of applying the criteria above. To better understand the implications on pre-existing employment, ECO associated the number of employees associated with each category. The results show a distribution that suggests lands in the higher and moderate categories account for a relatively small percentage of total employment in Springfield (about 3.5%). The lower potential category includes 19% of the city's total employment.

Table 2-10. Tax lots by Redevelopment Potential categories

Category	Total Acres	Suitable Acres	% of Land Base	Employment (2006)
Higher Potential	352	352	10%	478
Moderate Potential	304	236	9%	833
Lower Potential	947	947	28%	7,107
Total	1,603	1,535	47%	8,418

Source: City of Springfield GIS data; analysis by ECONorthwest

Note: Table 2-10 shows all redevelopment potential categories; lands in the *lower potential* category are not included as part of the redevelopable land inventory as explained below.

Note: Suitable acres includes vacant land with partial constraints and unconstrained suitable land.

Note: The 2015 update to the EOA did not update the buildable land analysis. The changes to the table above was a clarifications of column titles.

Because the improvement to land value ratio is a gross indicator, it is reasonable to assume that not all of parcels that meet this criterion for redevelopment *potential* will be assumed to redevelop during the planning period.

The data show that the lower potential criteria (building coverage $< 20\%$ of total lot area and improvement value $\geq 0.3:1.0$ and $\leq 0.5:1.0$) includes 28% of the City's total employment land base and more than 20% of covered employment in 2006. **The significant amount of land and employment in this category suggests limited redevelopment potential (for a land capacity analysis, redevelopment provides sites for employment growth only when an existing use is replaced by a use that**

has more employment). The rationale for this statement is that land that has more employment on it, and/or higher improvement value is already in a higher use. The economics of real estate development make it less desirable to redevelop land with substantial employment on it – in large part because it has tenants that are paying leases. Thus, the lower potential category is not included as part of the redevelopable base.

Use of this approach in the analysis was discussed with the Technical Advisory and Stakeholder Committees and supported by Springfield’s Planning Commission and City Council. In these meetings ECONorthwest explained the challenge of estimating redevelopment potential – an issue that confounds many analysts. Approximating redevelopment potential with this analytical approach has its limitations. Statewide planning policy provides no direction on how to evaluate redevelopment potential, and the academic literature on redevelopment does not identify specific models or tools that provide reliable identification of redevelopment sites.

In previous studies, ECONorthwest has frequently approached redevelopment from the demand side by making deductions from total employment growth to account for new employment that will not need any new land. For the Springfield EOA, we explored supply side approaches to corroborate the demand side deductions. The problem with supply side approaches is that the base data available to conduct such analyses is quite coarse and as a result, the analyses are limited. One typical approach is to use the ratio between improvement value and land value. Lands that fall under a pre-specified threshold (1:1 or 0.5:1 or some other figure) are considered underutilized. This approach has many problems; for example, it does not make distinctions for land intensive employment uses that require minimal built structure investments.

More robust approaches can consider employment densities, floor area ratios, and other factors. Often, however, the quality of the data is a limiting factor and the analysis is a crude indicator of what properties will actually redevelop over the planning period. In the Springfield-Eugene metropolitan area, we have seen properties redevelop over the past decade that would not be identified with the methodology used for the Springfield EOA. Conversely, many properties that would be identified using this approach will not redevelop.

Excluding the “Lower Redevelopment Potential” category leaves 581 unconstrained acres that are *potentially redevelopable* in Springfield. This represents the redevelopable land base that is used for the purpose of this study.

Table 2-11 shows potentially redevelopable land by plan designation and by parcel size. This analysis is useful in that it shows the distribution of potentially redevelopable land by parcel size, which allows an evaluation of whether a sufficient mix of parcel sizes is available. The distribution of buildable land by parcel size varies by plan designation, with the results showing the City has very few tax lots (1) over 20 acres with redevelopment potential.

Table 2-11. Buildable acres in potentially redevelopable tax lots by plan designation and parcel size, Springfield UGB, 2008¹⁹

Plan Designation	Lot Size (Buildable Acres)									Total
	<0.25	0.25-0.49	0.50-0.99	1.00-1.99	2.00-4.99	5.00-9.99	10.00-19.99	20.00-50.00	50+	
Total Acres										
Industrial										
Campus Industrial	0.2	0.5	1.9	3.4	5.0	0.0	0.0	0.0	0.0	11.0
Light Medium Industrial	3.9	10.0	10.6	12.4	36.3	19.4	0.0	0.0	0.0	92.7
Heavy Industrial	1.4	2.8	9.7	24.5	53.7	32.7	22.4	0.0	89.5	236.7
Special Heavy Industrial	0.0	0.0	0.0	1.7	0.0	0.0	12.4	63.2	0.0	77.4
Subtotal	5.5	13.3	22.2	42.0	95.0	52.1	34.9	63.2	89.5	417.7
Commercial										
Commercial	7.6	13.7	21.8	12.7	22.6	0.0	0.0	0.0	0.0	78.4
Community Commercial	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Major Retail Center	1.5	1.8	0.9	0.0	0.0	0.0	0.0	0.0	0.0	4.3
Subtotal	9.1	15.5	22.8	12.7	22.6	0.0	0.0	0.0	0.0	82.7
Mixed Use										
Commercial Mixed Use	9.6	7.8	14.3	10.0	8.9	0.0	0.0	0.0	0.0	50.6
Light Medium Industrial Mixed Use	0.1	0.3	0.7	0.0	0.0	0.0	0.0	0.0	0.0	1.1
Medium Density Res Mixed	0.4	0.3	2.5	1.2	9.2	0.0	0.0	0.0	0.0	13.5
Mixed Use	1.5	2.2	2.8	3.8	12.4	0.0	0.0	0.0	0.0	22.7
Subtotal	11.6	10.5	20.2	15.0	30.5	0.0	0.0	0.0	0.0	87.9
Total	26.2	39.4	65.2	69.7	148.1	52.1	34.9	63.2	89.5	588.2
Number of Tax Lots										
Industrial										
Campus Industrial	1	1	2	2	2	0	0	0	0	8
Light Medium Industrial	38	26	14	9	13	3	0	0	0	103
Heavy Industrial	22	6	12	16	16	5	2	0	1	80
Special Heavy Industrial	0	0	0	1	0	0	1	2	0	4
Subtotal	61	33	28	28	31	8	3	2	1	195
Commercial										
Commercial	70	37	31	9	6	0	0	0	0	153
Community Commercial	0	0	0	0	0	0	0	0	0	0
Major Retail Center	17	6	1	0	0	0	0	0	0	24
Subtotal	87	43	32	9	6	0	0	0	0	177
Mixed Use										
Commercial Mixed Use	69	22	21	7	3	0	0	0	0	122
Light Medium Industrial Mixed Use	1	1	1	0	0	0	0	0	0	3
Medium Density Res Mixed	2	1	3	1	2	0	0	0	0	9
Mixed Use	11	7	4	3	4	0	0	0	0	29
Subtotal	83	31	29	11	9	0	0	0	0	163
Total	231	107	89	48	46	8	3	2	1	535

Source: City of Springfield GIS data; analysis by ECONorthwest

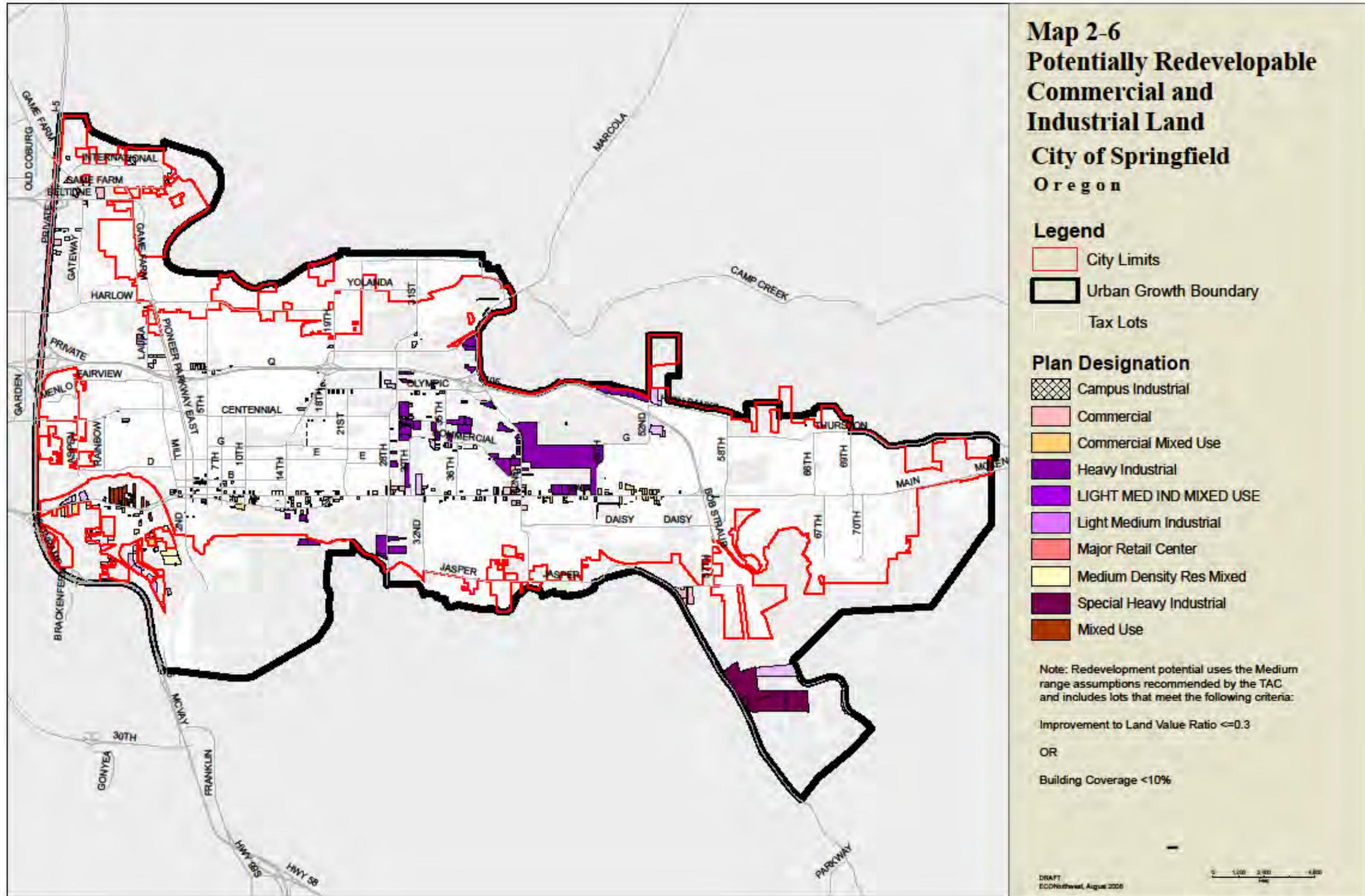
Note: Buildable acres includes "constrained" acres and "unconstrained" acres

Note: Acres may not sum to tenths due to rounding.

Map 2-6 shows the location of potentially redevelopable land in Springfield.

¹⁹ The table shows total buildable acres in potentially redevelopable tax lots (constraints are not netted out)

Map 2-6. Potentially redevelopable land



EVALUATION OF POTENTIALLY REDEVELOPABLE LAND IN SITES 5 ACRES AND LARGER

Table 2-11 identified 14 sites 5 acres and larger as being potentially redevelopable. Table 2-12 presents a site-by-site evaluation of these 14 potentially redevelopable sites. This evaluation determined whether the sites had at least 5 acres of redevelopment potential when site constraints, site configuration, and existing uses were considered. Table 2-12 presents the site-by-site summary of that analysis.

This section only evaluates sites five acres and larger because the analysis that determines whether Springfield has enough land in Chapter 5 (Table 5-1) assumes that all potentially redevelopable sites smaller than 5 acres may redevelop over the 2010-2030 period and that sites identified as providing redevelopment opportunities with at least 5 acres of suitable, unconstrained land in Table 2-12 may redevelop over the 2010-2030 period.

Table 2-12. Site-by-site review of parcels with redevelopment potential, sites 5 acres and larger, Springfield UGB, 2008

Site	Size and Absolute Development Constraints	Suitable Land and Other Development Considerations	Implications for Redevelopment Potential of Sites Larger than 5 Acres
Sites that provide redevelopment opportunities with at least 5 acres of suitable, unconstrained land.			
Taxlot: 1802100000200 Location: Jasper-Natron Plan Designation: Special Heavy Industrial 	47-acre site that is constrained by wetlands and slopes. It has a BPA easement in the southeast corner of the site.	This site has 36 acres of unconstrained land, which are divided by seven areas of wetlands on the site. Development on this site will be affected by the lack of contiguous areas for development, with wetland constraints and the BPA easement. The City is considering changing the plan designation and zoning from Special Heavy Industrial to General Employment. The rail spur that formerly served this site was eliminated when Straub Parkway was constructed.	This site provides opportunity for redevelopment of areas across the site but may not provide opportunities for redevelopment in a contiguous site. This site provides opportunity of 36 acres, across two or more areas within the site.

Site	Size and Absolute Development Constraints	Suitable Land and Other Development Considerations	Implications for Redevelopment Potential of Sites Larger than 5 Acres
<p>Taxlot: 1802100001001 Location: Jasper-Natron Plan Designation: Light Medium Industrial</p> 	<p>21-acre site constrained by wetlands and slopes.</p>	<p>This site has 12 unconstrained acres, with some interleaved wetlands.</p> <p>This tax lot has a split Plan Designation.</p>	<p>This site provides opportunity for redevelopment of a 12 acre site that is between wetland areas.</p>
<p>Taxlot: 1803010000100 Location: 28th Street Plan Designation: Heavy Industrial</p> 	<p>10 acre site with no absolute constraints.</p>	<p>This site has 10 acres of unconstrained land.</p>	<p>This site provides opportunity for redevelopment of a 10-acre site.</p>
<p>Taxlot: 1702311404300 Location: Commercial Ave. Plan Designation: Heavy Industrial</p> 	<p>8-acre site with little area with absolute constraints.</p>	<p>This site has 8 acres of unconstrained land.</p>	<p>This site provides opportunity for redevelopment of an 8-acre site.</p>

Site	Size and Absolute Development Constraints	Suitable Land and Other Development Considerations	Implications for Redevelopment Potential of Sites Larger than 5 Acres
<p>Taxlot: 1702300002002 Location: 30th/Olympic Plan Designation: Heavy Industrial</p> 	<p>7-acre site with no absolute constraints.</p>	<p>This site has 7 acres of unconstrained land. This site only has one access point for heavy trucks, which may constrain the types of uses on this site.</p>	<p>This site provides opportunity for redevelopment of a 7-acre site.</p>
<p>Taxlot: 1802060001004 Location: South 28th Street Plan Designation: Heavy Industrial</p> 	<p>7 acre site with no absolute constraints.</p>	<p>This site has 6.5 acres of unconstrained land.</p>	<p>This site provides opportunity for redevelopment of a 6.5-acre site.</p>
<p>Taxlot: 1702280000400 Location: Highbanks Road Plan Designation: Heavy Industrial</p> 	<p>7-acre site with about an acre in absolute constraints.</p>	<p>The site has 6 unconstrained acres of land. The site has developed since 2008, into Hyland Business Park.</p>	<p>This site provides opportunity for redevelopment of a 6.5-acre site.</p>

Site	Size and Absolute Development Constraints	Suitable Land and Other Development Considerations	Implications for Redevelopment Potential of Sites Larger than 5 Acres
Sites that <u>do not</u> provide opportunities for redevelopment of a site 5-suitable-acres and larger			
<p>Taxlot: 1702320000100 Location: 42nd Street Plan Designation: Heavy Industrial</p> 	<p>115 acre site with 25 acres of absolute constraints.</p> <p>Since the BLI was completed in 2009, the tax lot split. Willamalane Parks District owns 5 acres, at the south east portion of the site.</p>	<p>This site has 90 acres of unconstrained land, including the land now owned by Willamalane.</p> <p>This site is owned and used by a paper mill. As long as the paper mill is operational and continues to use this site, it will be unavailable for redevelopment.</p> <p>The City of Springfield identified the business on this site as one of its “Top thirty Springfield Employers,” with 225 employees.</p>	<p>This site provides <u>does not</u> provide an opportunity for redevelopment of a site 5-acres and larger.</p>
<p>Taxlot: 1802100000900 Location: Jasper-Natron Plan Designation: Special Heavy Industrial</p> 	<p>29-acre site with about 5 acres with absolute constraints.</p>	<p>The site has more than 24 acres of unconstrained land</p> <p>This site is owned and used by a wood products manufacturer. As long as the business is operational and continues to use this site, it will be unavailable for redevelopment.</p> <p>The City is considering changing the plan designation and zoning from Special Heavy Industrial to General Employment.</p>	<p>This site provides <u>does not</u> provide an opportunity for redevelopment of a site 5-acres and larger.</p>

Site	Size and Absolute Development Constraints	Suitable Land and Other Development Considerations	Implications for Redevelopment Potential of Sites Larger than 5 Acres
<p>Taxlot: 1702280000500 Location: Highbanks Road/Rice Farms Plan Designation: Heavy Industrial</p> 	<p>12-acre site with more than 3 acres in absolute constraints.</p>	<p>The site has 8.5 acres of unconstrained land. The site is separated into two segments, both of which are smaller than 5 acres of unconstrained land. Site is part of a 200-acre filbert orchard operation.</p>	<p>This site provides <u>does not</u> provide an opportunity for redevelopment of a site 5-acres and larger.</p>
<p>Taxlot: 1702332101219 Location: 52nd Street and Highway 126 Plan Designation: Light Medium Industrial</p> 	<p>6 acre site with little area with absolute constraints</p>	<p>This site has 6 acres of unconstrained land. This site is owned and operated by a mini-storage facility. As long as the mini-storage facility is operational and continues to use this site, it will be unavailable for redevelopment.</p>	<p>This site provides <u>does not</u> provide an opportunity for redevelopment of a site 5-acres and larger.</p>
<p>Taxlot: 1702311200100 Location: Industrial Ave./35th Plan Designation: Heavy Industrial</p> 	<p>6 acre site with little area with absolute constraints</p>	<p>This site has 6 acres of unconstrained land. This site is owned by and adjacent to an operational lumber yard. The site is used as a stacking area for the lumber yard. As long as the lumber yard is operational and continues to use this site, it will be unavailable for redevelopment.</p>	<p>This site provides <u>does not</u> provide an opportunity for redevelopment of a site 5-acres and larger.</p>

Site	Size and Absolute Development Constraints	Suitable Land and Other Development Considerations	Implications for Redevelopment Potential of Sites Larger than 5 Acres
<p>Taxlot: 1702310000400 Location: Main Street, east of 30th Plan Designation: Light Medium Industrial</p> 	<p>6 acre site with no absolute constraints.</p>	<p>The site has 6 acres of unconstrained land.</p> <p>This site is owned by the State Board of Forestry and has offices for the Oregon Department of Forestry and U.S. Fish and Wildlife. As long as these offices continue to be located on this site and the State owns the site, it will be unavailable for redevelopment.</p>	<p>The buildable lands inventory assumes that land in public ownership is not available for development, unless it is identified as surplus by the agency that owns it.</p> <p>This site provides <u>does not</u> provide an opportunity for redevelopment of a site 5-acres and larger.</p>
<p>Taxlot: 1702300001910 Location: Marcola Road Plan Designation: Heavy Industrial</p> 	<p>5 acre site with no absolute constraints</p>	<p>This site has 5 acres of unconstrained land.</p> <p>This site is owned by and used by a freight service business that is operational, with an office building in the middle of the site. As long as this business continues to operate, it will be unavailable for redevelopment.</p>	<p>This site provides <u>does not</u> provide an opportunity for redevelopment of a site 5-acres and larger.</p>

In summary, the evaluation of sites 5 acres and larger identified as potentially redevelopable shows that seven of these sites offer redevelopment opportunities, once site constraints, configuration issues, and existing employment uses are accounted for. These sites are:

- Six sites between 5 and 20 acres in size.
 - 12-acre site in the Jasper-Natron Special Heavy Industrial District
 - 10-acre site on 28th Street in Heavy Industrial
 - 8-acre site on 42nd Street in Heavy Industrial
 - 7-acre site at 28th and Marcola Road in Heavy Industrial
 - 6.5-acre site on 28th Street in Heavy Industrial

- 6-acre site on Highbanks Road in Heavy Industrial
- One site larger than 20 acres in size.
 - 36-acre site in the Jasper-Natron Special Heavy Industrial District

SHORT-TERM LAND SUPPLY

This section evaluates the short-term supply of land in the Springfield portion of the Metropolitan UGB. It begins with an overview of the policy context that requires this analysis, and then evaluates the short-term land supply.

POLICY CONTEXT

The Goal 9 Administrative Rule (OAR 660-009) includes provisions that require certain cities to ensure an adequate short-term supply of industrial and other employment lands. OAR 660-009-005(10) defines short term supply as follows:

“...means suitable land that is ready for construction within one year of an application for a building permit or request for service extension. Engineering feasibility is sufficient to qualify land for the short-term supply of land. Funding availability is not required. "Competitive Short-term Supply" means the short-term supply of land provides a range of site sizes and locations to accommodate the market needs of a variety of industrial and other employment uses.”

The Goal 9 rule also requires cities in a Metropolitan Planning Organization (MPO, which includes Springfield) to make a commitment to provide a competitive short-term supply of land and establishes targets for the short-term supply of land. Specifically, OAR 660-009-0020(1)(b) states:

“Cities and counties within a Metropolitan Planning Organization must adopt a policy stating that a competitive short-term supply of land as a community economic development objective for the industrial and other employment uses selected through the economic opportunities analysis pursuant to OAR 660-009-0015.”

The rule goes on to clarify short-term land supply targets for cities in an MPO (OAR 660-009-0025):

(3) Short-Term Supply of Land. Plans for cities and counties within a Metropolitan Planning Organization or cities and counties that adopt policies relating to the short-term supply of land must designate suitable land to respond to economic

development opportunities as they arise. Cities and counties may maintain the short-term supply of land according to the strategies adopted pursuant to OAR 660-009-0020(2).

(a) Except as provided for in subsections (b) and (c), cities and counties subject to this section must provide at least 25 percent of the total land supply within the urban growth boundary designated for industrial and other employment uses as short-term supply.

(b) Affected cities and counties that are unable to achieve the target in subsection (a) above may set an alternative target based on their economic opportunities analysis.

(c) A planning area with 10 percent or more of the total land supply enrolled in Oregon's industrial site certification program pursuant to ORS 284.565 satisfies the requirements of this section.

In summary, the rule requires Springfield to assess the short-term supply of land based on the criteria that land can be ready for construction within one year. The determination is based on “engineering feasibility.”

ANALYSIS OF SHORT-TERM SUPPLY OF LAND

The short-term supply analysis includes all lands within the Springfield portion of the Metropolitan UGB. To analyze the short term supply of land available for industrial and other employment uses, ECO worked closely with staff from the Springfield Public Works and Development Services Departments. A number of service issues were identified through this process that affect many different sites within the city. Identified deficiencies spanned the range of services, including water, wastewater, stormwater, and transportation.

Despite the issues staff identified, all areas within the Springfield UGB can be considered to technically meet the Goal 9 Rule criteria of “engineering feasibility.” Staff identified few areas where it was not possible to extend services within one year – provided that funding is available. Funding is a much broader and more complicated issue, but falls outside of the Goal 9 rule as written.

The analysis did identify the Jasper-Natron area as unlikely to meet the short-term supply criteria. This is due to a combination of wetlands that make drainage an issue as well as the distance from existing water and sewer trunk lines (more than one mile from the nearest 18” sewer line to the north end of the site).

Table 2-13 summarizes the number of vacant and potentially redevelopable acres in the short-term land supply. The results indicate that 91% of the vacant commercial and industrial land is considered available as short-term supply, and 85% of land with redevelopment potential is available as short-term supply. Buildable land in the Jasper-Natron area is not considered part of the short-term land supply.²⁰ The Jasper-Natron area is the only area of the city with employment lands that are not considered part of the short term supply.

Table 2-13. Short-term land supply

Category/Plan Designation	Buildable Acres	Acres in Short-Term Supply	Percent in Short Term Supply
Vacant			
Commercial	54.1	45.5	84%
Industrial	254.8	231.5	91%
Mixed Use	45.6	45.6	100%
Subtotal	354.5	322.7	91%
Potentially Redevelopable			
Commercial	80.7	80.7	100%
Industrial	412.2	325.6	79%
Mixed Use	87.9	87.9	100%
Subtotal	580.9	494.2	85%

Source: City of Springfield GIS data; analysis by ECONorthwest

Note: Acres may not sum to tenths due to rounding.

Note: This table has not been updated to reflect construction of the Jasper Natron Trunk Sewer Phase One, completed in 2013.

²⁰ In 2013, the City constructed the first phase of the Jasper Natron Trunk Sewer, serving the northern portion of the Jasper Natron area.

Economic Trends and Factors Affecting Future Economic Growth in Springfield

Chapter 3

Springfield exists as part of the larger economy of the southern Willamette Valley and is strongly influenced by regional economic conditions. For many factors, such as labor, Springfield do differ significantly from the broader region. For other factors, such as income, it does. Thus, Springfield benefits from being a part of the larger regional economy and plays a specific role in the regional economy.

This chapter summarizes national, state, county, and local trends and other factors affecting economic growth in Springfield. Each heading in this chapter represents a key trend or economic factor that will affect Springfield's economy and economic development potential. A more detailed analysis of economic trends and factors affecting Springfield's future economic growth is presented in Appendices A and B.

This chapter and the information in Appendices A and B addresses the following Goal 9 requirements:

- OAR 660-009-0015(1), which requires a review of national, state, regional, county, and local trends to “identify the major categories of industrial or other employment uses that could reasonably be expected to locate or expand in the planning area.”
- OAR 660-009-0015(4), which requires the City to assess community economic development potential to “estimate the types and amounts of industrial and other employment uses likely to occur in the planning area.” This estimate must consider the planning area's economic advantages and disadvantages.

AVAILABILITY OF LABOR

The availability of trained workers in Springfield will impact development of Springfield's economy over the planning period. Based on the analysis in this section, the key trends that will affect the workforce in Springfield over the next 20 years include Springfield's growing population, aging population, relatively low income, and commuting trends.

GROWING POPULATION

Population growth in Oregon tends to follow economic cycles. Historically, Oregon's economy is more cyclical than the nation's, growing faster than the national economy during expansions and contracting more rapidly than the nation during recessions.

Table 3-1 shows population growth in the U.S., Oregon, the Willamette Valley, Lane County, Eugene, and Springfield for the 1990 to 2007 period. Lane County grew slower than the State average between 1990 and 2007, growing at 1.1% annually and adding more than 60,000 people. More than 60% of the County's population lived in the Eugene-Springfield area in 2007, with about 17% of the County's population in the Springfield city limits. Springfield's population grew faster than the County average, at 1.5% annually, adding 12,637 residents over the seventeen-year period.

Table 3-1. Population in the U.S., Oregon, the Willamette Valley, Lane County, Springfield, and Eugene, 1990-2007

Area	Population			Change 1990 to 2007		
	1990	2000	2007	Number	Percent	AAGR
U.S.	248,709,873	281,421,906	301,621,157	52,911,284	21%	1.1%
Oregon	2,842,321	3,421,399	3,745,455	903,134	32%	1.6%
Willamette Valley	1,962,816	2,380,606	2,602,790	639,974	33%	1.7%
Lane County	282,912	322,959	343,140	60,228	21%	1.1%
Springfield	44,683	52,864	57,320	12,637	28%	1.5%
Eugene	112,669	137,893	153,690	41,021	36%	1.8%

Source: U.S. Census, the Population Research Center at Portland State University.

Notes: Benton, Clackamas, Lane, Linn, Marion, Multnomah, Polk, Washington, and Yamhill Counties represent the Willamette Valley Region. Figures for Springfield and Eugene are for areas inside their respective city limits.

Migration is the largest component of population growth in Oregon. Between 1990 and 2007, in-migration accounted for 70% of Oregon's population growth. Over the same period, in-migration accounted for 74% of population growth in Lane County, adding nearly 44,500 residents over the seventeen-year period.

AGING POPULATION

The number of people age 65 and older in the U. S. is expected to double by 2050, while the number of people under age 65 will only grow by 12%.

The economic effects of this demographic change include a slowing of the growth of the labor force, need for workers to replace retirees, aging of the workforce for seniors that continue working after age 65, an increase in the demand for healthcare services, and an increase in the percent of the federal budget dedicated to Social Security and Medicare.²¹

The average age of Springfield residents is increasing. According to the US Census, Springfield's average age was 32 in 2000, 30 in 1990, and 26 in 1980. Table 3-2 shows the change in age distribution for Springfield between 2000 and 2008. The age group that increased the most was 45 to 64, which grew by 2,540 people (24%). This age group's proportion of the total population increased from 20% to 23% during this time period. The largest percentage decrease was in people aged 18 to 24, which shrunk by 913 people (16%).

Table 3-2. Change in age distribution, Springfield, 2000-2008

Age Group	2000		2008		Change 2000 to 2008		
	Number	Percent	Number	Percent	Number	Percent	Share
Under 5	4,327	8%	4,121	7%	-206	-5%	-0.8%
5-17	10,069	19%	10,477	19%	408	4%	-0.3%
18-24	5,890	11%	4,977	9%	-913	-16%	-2.3%
25-44	16,609	31%	17,372	31%	763	5%	-0.4%
45-64	10,546	20%	13,086	23%	2,540	24%	3.4%
65 and over	5,423	10%	5,983	11%	560	10%	0.4%
Total	52,864	100%	56,016	100%	3,152	6%	0.0%

Source: U.S. Census 2000 and Clarita's 2008

Note: Percent change over the 2000 to 2008 period is based on the growth in the age group divided by the number of people in the age group in 2000. For example, people 5 to 17 years old had a 4% percent change, which was calculated using the following calculation: $408/10,069 = 4\%$.

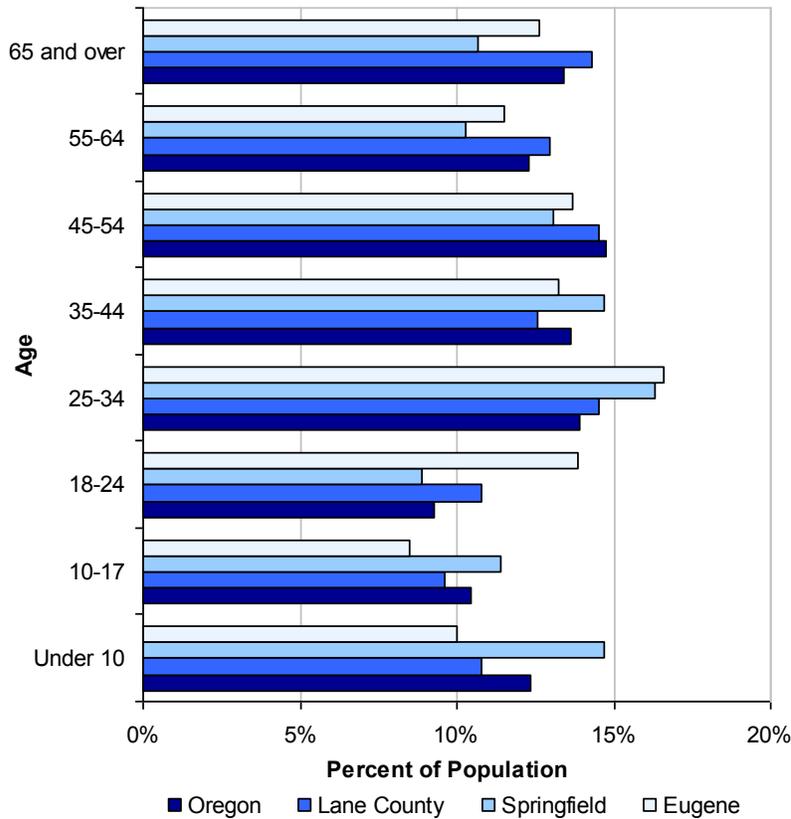
Note: Share refers to the change in the percent of an age group between 2000 and 2008. For example, the share of people 18 to 24 years old decreased from 11% to 9%, a decrease of 2.3%.

Note: Percentages may not add to 100% as a result of rounding errors.

Springfield's population was younger than the County or State averages in 2008. Figure 3-1 shows the age structure for Oregon, Lane County, Eugene, and Springfield in 2008. Springfield had a greater proportion of its population under 44 years of age (66%) than Eugene (62%), Lane County (58%), or Oregon (60%). Springfield also had a smaller share of population aged 55 and older, 21% of Springfield's population, compared to 24% in Eugene, 27% in the County, 26% in the State.

²¹ The Board of Trustees, Federal Old-Age and Survivors Insurance and Federal Disability Insurance Trust Funds, 2008, *The 2008 Annual Report of the Board of Trustees of the Federal Old-Age and Survivors Insurance and Federal Disability Insurance Trust Funds*, April 10, 2008. *The Budget and Economic Outlook: Fiscal Years 2007 to 2016*, January; and Congressional Budget Office, 2005, *The Long-Term Budget Outlook*, December.

Figure 3-1. Population by age, Oregon, Lane County, Eugene, and Springfield, 2008



Source: Claritas 2008, percentages calculated by ECONorthwest.

INCOME

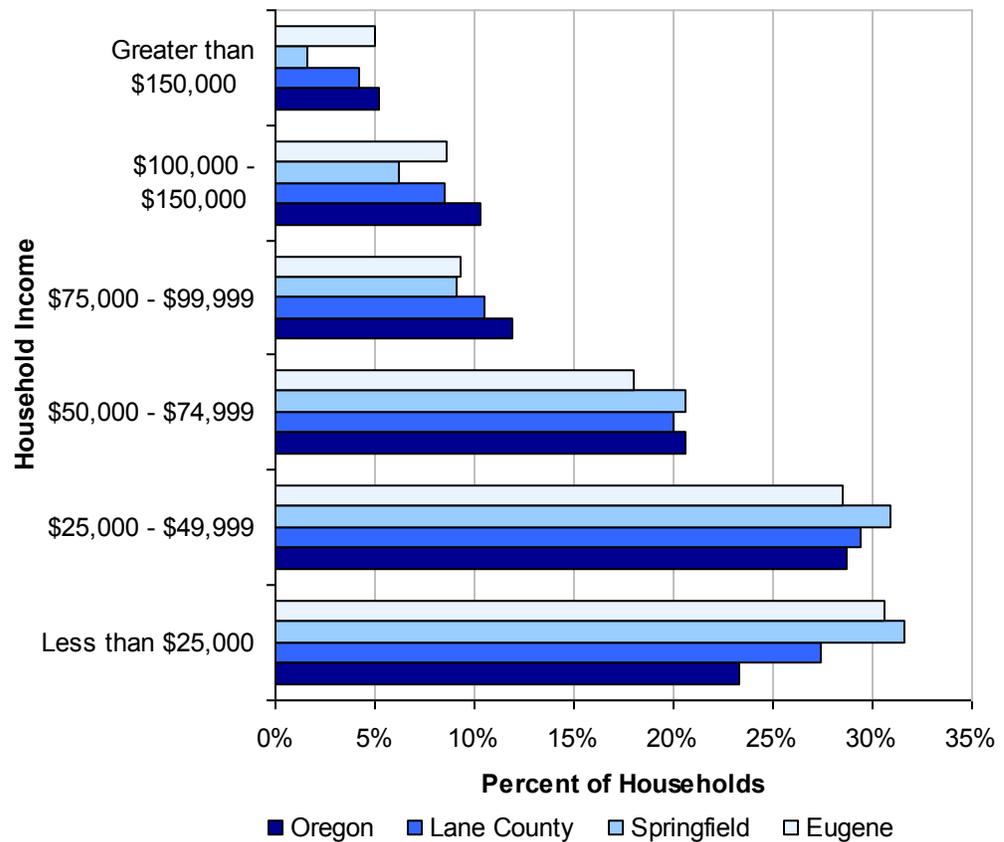
Over the last twenty-four years, income in Oregon has been below national averages and income in Lane County has been below state averages. There are four basic reasons that income has been lower in Oregon and Lane County than in the U.S.: (1) wages for similar jobs are lower; (2) the occupational mix of employment is weighted towards lower paying occupations; (3) a higher proportion of the population has transfer payments (e.g. social security payments for retirees), which are typically lower than earnings; and (4) lower labor force participation among working age residents. To a certain degree, these factors are all true for Oregon and Lane County. The combination of these factors results in lower income for Oregon and Lane County.

In addition, wages in Lane County and Oregon tend to be more volatile than the national average. The major reason for this volatility is that the relative lack of diversity in the State and County economy. Wages in Oregon and Lane County are impacted more than the national average by downturns in either the national economy or in industries in Oregon that

are dependent on natural resources (e.g., timber and wood processing or R.V. manufacturing).

Lane County’s median household income in 2006 was \$42,127, compared with \$46,230 for Oregon and the national average of \$48,451. Figure 3-2 shows the distribution of household income in Oregon, Lane County, Eugene, and Springfield in 2008. Figure 3-2 shows that a larger share of households in Springfield (32%) had an income of \$25,000 or less, compared to Lane County (27%) or the State (23%). Springfield also has a lower share of households with income above \$75,000 (17%), compared to Eugene (23%), the County (23%), or the State (27%).

Figure 3-2. Distribution of household income of U.S., Oregon, and Lane County, 2008



Source: Claritas 2008

The low average income in Lane County and Springfield, relative to Oregon and the U.S., makes Springfield attractive to some firms considering moving within the United States. Firms continue to outsource back-office functions, such as call centers or administrative functions, within the United States Lane County’s relatively low labor costs and the availability of trained workers make Lane County attractive to firms considering relocating back-office functions.

EDUCATIONAL ATTAINMENT

The availability of trained, educated workers affects the quality of labor in a community. Educational attainment is an important labor force factor because firms need to be able to find educated workers. In 2007, 26% of Springfield's residents had an associate's degree or higher, compared to the County average of 37% and Eugene's average of 47% of residents with an associate's degree or higher. Firms locating in Springfield will be able to attract employees from within Springfield and across the Eugene-Springfield region.

WORKFORCE PARTICIPATION

The current labor force participation rate is an important consideration in the availability of labor. The labor force in any market consists of the adult population (16 and over) who are working or actively seeking work. The labor force includes both the employed and unemployed. Children, retirees, students, and people who are not actively seeking work are not considered part of the labor force.

In 2007, Springfield's labor participation rate was 67% of their over-16 population of over 43,000. Of their 67% in the labor force, 10% were unemployed. In comparison, Lane County had 63% labor force participation, 8% of whom were unemployed. Labor force participation rates have dropped by about 1% since 2000, when Springfield's labor participation rate was 68%, compared to the State average of 64%.

COMMUTING PATTERNS

Commuting plays an important role in Springfield's economy. Springfield residents generally have a shorter commute than residents of Lane County or Oregon. Eighty percent of Springfield residents commute 29 minutes or less, compared to 77% of Lane County residents and 69% of Oregonians. Residents of Springfield are less likely to have a long commute, with 7% of Springfield's residents commuting 45 minutes or more, compared to 10% of Oregonians.

The majority of Springfield's workforce (79%) lives in Lane County, with 29% in Springfield and 23% in Eugene. The majority of Springfield residents (81%) work in Lane County, with 25% working in Springfield and 40% working in Eugene.

The implication of this data is that most people living or working in Springfield commute within the Eugene-Springfield area. This commuting pattern gives Springfield firms access to the workforce within the Eugene-Springfield region. Even though commutes in Springfield are generally

shorter than the State average, these commuting patterns create demand for automotive and other forms of transportation, both within Springfield and on roads throughout the Eugene-Springfield region.

Increasing energy prices may impact commuting patterns within the Eugene-Springfield area. The impact is most likely to be greatest for residents living in the smaller cities around the Eugene-Springfield area (e.g., Veneta or Oakridge) because the commute to Springfield is longer from these outlying cities. Willingness to commute by most workers living and working within Eugene and Springfield is likely to have relatively little impact from fuel prices, unless prices increase dramatically.

CHANGES IN EMPLOYMENT

The economy of the nation changed in the 1980 to 2006 period. These changes affected the composition of Oregon's economy, including Lane County and Springfield. The most important shift during this period at the national-level was the shift in employment from a focus on manufacturing to services. The most important shift in Oregon, including Lane County and Springfield, has been the shift from a timber-based economy to a more diverse economy, with the greatest employment in services. The most important trends and changes in employment for Springfield over the next 20-years are: shifts in employment, growing importance of health care, continued importance of manufacturing, and outlook for growth in Springfield.

SHIFTS IN EMPLOYMENT

Over the past few decades, employment in the U.S. has shifted from manufacturing and resource-intensive industries to service-oriented sectors of the economy. Increased worker productivity and the international outsourcing of routine tasks have led to declines in employment in the major goods-producing industries.

In the 1970s Oregon started to transition away from reliance on traditional resource-extraction industries. An important indicator of this transition is the shift within Oregon's manufacturing sector, with a decline in the level of employment in the Lumber & Wood Products industry²² and concurrent growth of employment in high-technology manufacturing industries (Industrial Machinery, Electronic Equipment, and Instruments²³).

²² Lumber and Wood Products manufacturing is in Standard Industrial Classification (SIC) 24

²³ SIC 35, 36, 38

As Oregon has transitioned away from natural resource-based industries, the composition of Oregon's employment has shifted from natural resource based manufacturing and other industries to service industries. The share of Oregon's total employment in Service industries increased from its 1970s average of 19% to 30% in 2000, while employment in Manufacturing declined from an average of 18% of total employment in the 1970s to an average of 12% in 2000.

The changes in employment in Lane County have followed similar trends as changes in national and state employment. Between 1980 and 2006, Lane County added more than 53,000 jobs. The sectors with the greatest change in share of employment were Services and Retail Trade, adding more than 38,500 or 73% of new jobs. Over the 26-year period, manufacturing added more than 4,000 jobs (8% of new jobs), with the greatest growth in: Transportation Equipment manufacturing (R.V. manufacturing), Computer and Electronics manufacturing, and Machinery manufacturing.

Some industries in the region's employment base have volatile employment cycles. These industries typically have boom and bust cycles, which result cycles of hiring and layoffs. The lumber and wood products industry is tied to national housing market cycles, with decreased productivity and employment in slow housing markets. The RV manufacturing industry is tied to broader national economic trends and energy price changes. Finally, the region's high-tech companies are subject to market trends in the high-tech industry, including changes in production methods and consumer purchasing patterns. Two major high-tech firms, Hynix and Sony, located in the Eugene-Springfield region and closed their production facilities between the mid-1990's and 2008.

The average pay per employee in Lane County in 2006 was \$33,240. The sectors with above average pay and high employment were: Construction, Manufacturing, Government, and Health and Social Services. The sectors with below average pay and high employment were: Retail, Accommodations and Food Services, and Administration and Support and Waste Management.

In 2006, Springfield had 27,310 jobs at 1,819 establishments, with an average firm size of 15 employees. The sectors with the greatest employees were: Retail (13%), Government (13%), Health Care and Social Assistance (11%), and Manufacturing (10%). These sectors accounted for 17,863 or 65% of Springfield's jobs.

OUTLOOK FOR GROWTH IN SPRINGFIELD

The State forecasts that employment will continue growing in Lane County at 1.4% average annual growth, compared with the State average of 1.3% average annual growth. The sectors that will lead employment growth in Lane County for the ten-year period are: Health Care & Social Assistance (adding 5,600 jobs), Government (adding 3,600 jobs), Professional and Business Services (adding 3,000 jobs), Leisure & Hospitality (adding 2,800 jobs), and Retail Trade (adding 2,400 jobs). Together, these sectors are expected to add 17,400 new jobs or 76% of employment growth in Lane County. Springfield has a high concentration of employment in Health Care & Social Assistance, especially with the relocation of PeaceHealth's regional hospital to RiverBend. Springfield's concentration of employment in health care may further increase based on where McKenzie-Willamette Medical Center relocates to and the size of the new hospital.

One way to determine opportunities for economic development is to determine the sectors with the greatest expected growth in the region (based on the Oregon Employment Department's forecast for employment growth in Lane County between 2006 and 2016) and the greatest concentration of existing employment in the community (based on a comparison of employment data in Springfield and the State in 2006). Sectors with high employment concentration in Springfield and high growth forecasts are the industry's most likely to grow. These sectors in Springfield are: Health and Social Assistance; Administrative and Support and Waste Management Services; Construction; and Accommodations and Food Services.

Springfield may have opportunities for growth in other sectors that the State forecasts will have high growth. Springfield, however, does not currently have high employment concentrations in some of these sectors: Arts, Entertainment, and Recreation; Management of Companies and Enterprises; Professional, Scientific, and Technical Services; and Private Educational Services.

It is unclear what long-term impact rising fuel and transportation costs will have on Oregon's economy, including Springfield. Globalization and outsourcing of jobs, especially manufacturing jobs, has occurred since the 1980's, changing the state's economy. Globalization depends, in part, on inexpensive transportation of materials and manufactured goods. Businesses have relocated from areas with lower labor costs, in part, because transportation costs were low.

Increases in fuel prices have resulted in higher transportation costs, decreasing the benefits of lower wages. It is possible that, if fuel and transportation costs remain high and/or increase, companies may move to be closer to suppliers or consumers. This effect occurs incrementally over time and it is difficult to measure the impact in the short-term. If fuel prices and transportation costs decrease over the planning period, businesses may not make the decision to relocate (based on transportation costs) because the benefits of being closer to suppliers and markets may not exceed the costs of relocation.

REGIONAL BUSINESS ACTIVITY

GROWING IMPORTANCE OF HEALTHCARE

PeaceHealth has recently relocated its main hospital to the Gateway area in Springfield. The RiverBend campus will have 2,500 PeaceHealth employees by the end of 2008, in occupations including: physicians, nurses, medical technicians, other medical staff, environmental services staff, and food services staff. PeaceHealth started relocating administrative and other staff to the RiverBend Annex in 2006 (located in the former Sony disc manufacturing building), which has 700 employees.

The RiverBend campus will attract additional firms. For example, Oregon Medical Labs, Oregon Imaging Center, and the Northwest Specialty Clinics will have approximately 350 staff and physicians at the RiverBend campus. The RiverBend Pavilion will have about 300 employees, at the Oregon Medical Group, Oregon Imaging, and other medical businesses.

Employment in health care may also increase in Springfield, depending on where McKenzie-Willamette Medical Center locates its new facility. If the new facility is located in Springfield and if the facility is bigger and employs more people than the existing hospital, Springfield will have another major healthcare center as well as more healthcare employment.

CONTINUED IMPORTANCE OF MANUFACTURING

Manufacturing continues to be important to the economy in Springfield and in Lane County. Manufacturing accounted for 14% of employment (more than 20,000 jobs) in Lane County and 10% of employment (more than 2,700 jobs) in Springfield in 2006.²⁴ Manufacturing industries continue to offer jobs with above-average wages, making these jobs more desirable.

²⁴ Oregon Employment Department

Manufacturing grew slowly in Lane County between 1980 and 2006, at an average annual rate of 0.3%, adding more than 4,000 jobs. The State forecasts continued growth in manufacturing at the same rate over the 2006 to 2016 period.

Manufacturing is a traded sector industry, which brings revenue into Oregon and Lane County from outside the State. The following manufacturing industries accounted for two-thirds (\$11 billion) of revenue from exports in Oregon in 2007: Computer & Electronic Production, Transportation Equipment, Machinery Manufacturers, Chemical Manufacture, and Primary Metal Manufacturers.²⁵ These industries are all present in Lane County, accounting for 44% of manufacturing employment in the County.

Continuing changes in the economy may impact manufacturing in Lane County. For example, high energy prices may have been a factor in the decrease of RV manufacturing in Lane County, which has resulted in the layoff of employees beginning in 2006. In addition, the economic downturn and consolidation of the paper manufacturing industry may result in layoffs in firms that manufacture wood products and paper.

Although much of this employment is located outside of Springfield, it affects residents of Springfield, either directly through job layoffs or indirectly through decreases in economic activity.

TOURISM IN LANE COUNTY

Tourism brings economic activity into Lane County from outside sources. Tourism expenditures in Lane County in 2006 grew 7.5%, to \$553 million, exceeding the statewide tourism growth rate for the year. Tourism accounts for about 7,500 jobs in Lane County.

A major source of tourism spending is overnight accommodations. In 2008, the Eugene-Springfield Region had 3,118 total rooms. Occupancy rates varied from 59% in fiscal year 2002 and 2003 to 72% in fiscal year 2006. Springfield levies a 9.5% transient lodging tax on overnight accommodations. Between 2000 and 2008, Springfield's lodging tax revenue varied from \$1.2 million in fiscal year 2004 to \$1.6 million in fiscal year 2007. Springfield's transient lodging tax revenues accounted for about one-quarter of total County lodging tax revenues.

²⁵ "Economic Data Packet, Mary 2008," Oregon Economic And Community Development Department

SIGNIFICANCE OF AGRICULTURE IN LANE COUNTY

Agriculture continues to be important in Lane County's economy. In 2002, Lane County had approximately \$88 million in total gross sales from agriculture. The top five agricultural products in Lane County in 2002 were: Nursery and greenhouse (\$21 million); milk and dairy (\$10.3 million); cattle and calves (\$7.6 million), fruits, tree nuts, and berries (\$6.7 million); and vegetables, melons, potatoes, and sweet potatoes (\$5.6 million).

While agriculture is an important source of economic activity in Lane County, Springfield has relatively little agricultural employment within the UGB. In 2006, about 1% of Springfield's covered employment (282 employees) were employed in the Agriculture, Forestry, Fishing, and Mining sectors. About half of these jobs (136 employees) were in Forestry and Logging. Consistent with statewide land use policy, land within the Springfield UGB is committed for future urban uses, rather than agricultural uses.

SPRINGFIELD'S COMPARATIVE ADVANTAGES

Economic development opportunities in Springfield will be affected by local conditions as well as the national and state economic conditions addressed above and described in Appendix A. Factors affecting future economic development in the Springfield include its location, availability of transportation facilities and other public facilities, quality and availability of labor, and quality of life. Economic conditions in Springfield relative to these conditions in other portions of the Lane County and southern Oregon form Springfield's comparative advantage for economic development. Springfield's comparative advantages have implications for the types of firms most likely to locate and expand in Springfield.

There is little that Springfield can do to influence national and state conditions that affect economic development. Springfield can influence local factors that affect economic development. Springfield's primary comparative advantages are its location on I-5, proximity to Eugene, access to skilled labor, cost of labor, and high quality of life. These factors make Springfield attractive to residents and businesses that want a high quality of life where they live and work.

The local factors that form Springfield's comparative advantage are summarized below and described in detail in Appendix B.

- **Location.** Springfield is located in the Southern Willamette Valley, next to Eugene, between the Willamette River (to the

south) and McKenzie River (to the north). Interstate 5 runs to the west of Springfield and Highway 126 runs east-west through Springfield.

Springfield's location, access to I-5 and Highway 126, and proximity to Eugene are primary comparative advantages for economic development in Springfield. These factors make Springfield attractive to businesses, especially those wanting to locate in the Willamette Valley.

- **Buying Power of Markets.** The buying power of Springfield and the Eugene-Springfield area forms part of Springfield's comparative advantage by providing a market for goods and services. According to estimates on household spending by Claritas, households in Springfield are expected to spend about \$937 million in 2008, about 14% of total household expenditures in the Eugene-Springfield Region. Springfield households spend an average of \$42,700 on commonly purchased items, not including housing, Springfield's households spent less than the regional and nation averages, with about 91% of the \$47,000 average expenditures for all households in the Eugene-Springfield MSA and 84% of national average household expenditures (Claritas, 2008).

The buying power of households in the Eugene-Springfield region provides Springfield with a comparative advantage. Access to households in the Eugene-Springfield Region provides businesses in Springfield with greater sales potential than other, smaller cities in the Southern Willamette Valley. As the population in Springfield (and the Eugene-Springfield region) grows, Springfield will need to provide more land for firms that provide services to residents and businesses.

- **Transportation.** Businesses and residents in Springfield have access to a variety of modes of transportation: automotive (Interstate 5, multiple State highways, and local roads); rail (Union Pacific and Amtrak); transit (LTD); and air (Eugene Airport). Springfield has excellent automotive access for commuting and freight movement. Springfield is located along Interstate 5, the primary north-south transportation corridor on the West Coast, linking Springfield to domestic markets in the United States and international markets via West Coast ports. Springfield has developed along Highway 126, Highway 126 is the primary east-west highway in Lane County, running from Florence to Redmond.

Other transportation options in Springfield include: multiple Union Pacific rail lines provide freight service; transit service from the Lane Transit District provides bus service within Springfield and connects Springfield with Eugene; and the Eugene Airport provides both passenger and freight service.

Springfield's access to multiple modes of transportation provides Springfield with advantages in attracting businesses that need easy access to I-5 for automotive or some types of freight movement. Springfield may have disadvantages in attracting businesses that need large lots and easy access to I-5 (e.g., warehousing and transportation) because of the lack of buildable industrial land along I-5 near Highway interchanges.

- **Public Facilities and Services.** Provision of public facilities and services can impact a firm's decision on location within a region. Once a business has chosen to locate within a region, they consider the factors that local governments can most directly affect: tax rates, the cost and quality of public services, and regulatory policies.

Springfield's property tax rate ranges from \$16.32 and \$18.65 per \$1,000 of assessed value, compared with a state average of \$15.20. The property tax rate in Eugene is more variable than Springfield's, ranging from \$10.31 (possibly located in an area outside of Eugene's city limits) to \$24.68 per \$1,000 of assessed value.²⁶ Springfield's property tax rates may provide the City with little comparative advantage in attracting businesses, relative to Eugene.

The City has sufficient water to meet expected residential and employment needs. The local water provider, Springfield Utility Board (SUB), is not concerned about its ability to supply water to any type of industry, including water-intensive industries like food processing. SUB has lower water rates than the national average. The combination of available and lower cost water may be an advantage to attracting some types of businesses to Springfield.

Based on discussions with staff at SUB, Springfield expects to be able to meet demand for wastewater services resulting from

²⁶ Property tax rates for Springfield and Eugene are a composite of the rates for all properties with an address in Eugene or Springfield. It is almost certain that some of these properties is located outside of both the Eugene and Springfield urban growth boundaries and are subject to unincorporated Lane County tax rates.

expected growth. The City expects to provide service to 6,100 new equivalent dwelling units, which includes residences and businesses, over the next 20-years.

- **Public Policy.** Public policy can impact the amount and type of economic growth in a community. The City can impact economic growth through its policies about the provision of land, redevelopment, and infill development. Success at attracting or retaining firms may depend on availability of attractive sites for development, especially large sites. For example, Springfield was attractive as a location of PeaceHealth's new hospital because the City had a large, relatively flat site located relatively near to Interstate 5 and Beltline Highway.

Springfield's decision makers articulated their support for provision of employment land through the economic development strategy and in other policy choices. Objectives in the economic development strategy supporting the provision of employment land include objectives to: (1) provide employment land in a variety of locations, configurations, and site sizes for industrial and other employment uses, (2) provide an adequate competitive short-term supply of suitable land to respond to economic development opportunities as they arise, (3) reserve sites over 20-acres for special developments and industries that require large sites, and (4) provide adequate infrastructure to sites.

The economic development strategy also includes objectives that support redevelopment of existing land within the UGB, especially in Downtown and in Glenwood, and infill development. In addition, the City is promoting redevelopment in Downtown through the creation of the Urban Renewal District in Downtown Springfield.²⁷

- **Labor Market.** The availability of labor is critical for economic development. Availability of labor depends not only on the number of workers available, but the quality, skills, and experience of available workers as well.

²⁷ Some of the redevelopment in Downtown and Glenwood may result in redevelopment of existing buildings, replacing old buildings with new buildings, but may not result in an increase in employment capacity in the new building. This study identifies land with redevelopment potential as land on which development has already occurred but on which, due to present or expected market forces, there exists the potential that existing development will be converted to more intensive uses (providing additional employment capacity) during the planning period.

Commuting is common in Springfield. About 40% of the people who live in Springfield commute to Eugene for work. Less than one-third of Springfield's workers live in Springfield. The implication of this workforce analysis is that, while only one-third of Springfield's workforce lives within the City, Springfield is able to attract educated workers from most of Eugene and surrounding areas in Lane County.

It does not appear that workforce will be a constraint on employment growth in Springfield. Springfield should be able to continue to draw on residents of Eugene for workers, even if energy prices continue to rise but Springfield's ability to attract workers from outside of the Eugene-Springfield area may be negatively impacted by continued increases in energy prices.

Opportunities for workforce training and post-secondary education for residents of the Eugene-Springfield area include: the University of Oregon, Lane Community College, Northwest Christian College, and Gutenberg College.

Land Demand and Site Needs in Springfield

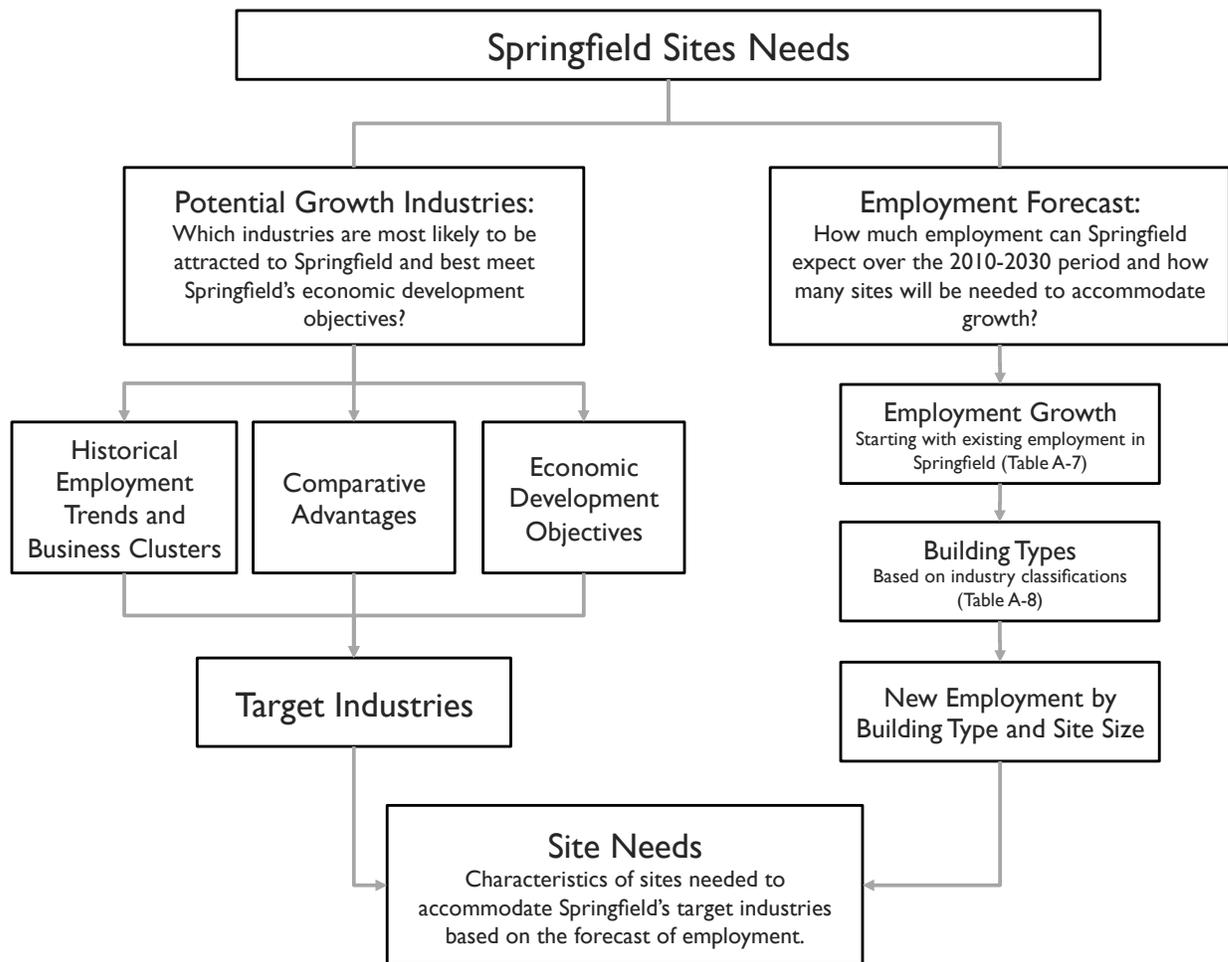
OAR 660-009 requires cities to maintain a 20-year inventory of sites designated for employment. To provide for at least a 20-year supply of commercial and industrial sites consistent with local community development objectives, Springfield needs an estimate of the amount of commercial and industrial land that will be needed over the planning period. Demand for commercial and industrial land will be driven by the expansion and relocation of existing businesses and new businesses locating in Springfield. The level of this business expansion activity can be measured by employment growth in Springfield.

This chapter and Appendix C (which presents the full forecast of employment growth and site needs) addresses the requirements of OAR 660-009-0015(2) for the City to “identify the number of sites by type reasonably expected to be needed to accommodate the expected employment growth based on the site characteristics typical of expected uses. Cities and counties are encouraged to examine existing firms in the planning area to identify the types of sites that may be needed for expansion.”

Figure 4-1 shows the process for identifying Springfield’s site needs. The process involved identifying potential growth industries, in the form of target industries, and identifying characteristics of sites needed by these industries. The process also involved forecasting employment growth in Springfield and allocating that employment growth to building types (e.g., general industrial or office buildings) and site sizes (by acres).

Chapter 4 presents Springfield’s potential growth industries and summarizes the employment forecast (which is documented in detail in Appendix C). Chapter 5 describes the site needs of the target industries.

Figure 4-1. Process for identifying site needs in Springfield.



Source: ECONorthwest

POTENTIAL GROWTH INDUSTRIES

An analysis of growth industries in Springfield should address two main questions: (1) Which industries are most likely to be attracted to the Eugene-Springfield area? and (2) Which industries best meet Springfield's economic objectives? The types of industries that Springfield wants to attract to meet economic development objectives: high-wage, stable jobs with benefits; jobs requiring skilled and unskilled labor; employers in a range of industries that will contribute to a diverse economy; and industries that are compatible with Springfield's community values.

KEY TRENDS AFFECTING EMPLOYMENT GROWTH

Previous chapters reviewed historical growth trends by industry in the Eugene-Springfield Region and Lane County since 1980 and employment in Springfield. A review of key historical trends in employment in the Eugene-Springfield Region can help identify potential growth industries in Springfield. In other words, economic opportunities in Springfield are a function of regional historical trends and future economic shifts.

While nearly all sectors of the economy in the Region experienced growth over this period, some sectors grew faster than others, resulting in a shift in the distribution of employment by sector. Key **historical trends** include in the 1980 to 2007 period include:

- A substantial increase in the share of employment in Services, which increased from 23% to 42% of covered employment in Lane County.
- A decrease in the share of employment in Retail Trade, from 21% to 13%. The number of jobs in retail did not decrease substantially over the 27-year period (a loss of nearly 550 retail jobs) but growth in retail jobs lagged behind growth in other sectors, especially service sectors.
- A decline in the share of employment in Manufacturing, which fell from 20% to 13% of covered employment.
- A decline in the share of employment in Government, which decreased from 20% to 16% of covered employment.

Together, these sectors represent about 84% of employment in the County. Other sectors of the County's economy have a relatively stable and small share of the County's employment.

Historical employment trends show a substantial shift in the Region's economy that mirrored shifts in the State and national economies, specifically the substantial growth in Services and decline of Manufacturing. While these trends are expected to continue into the future, **future shifts** are not expected to be as dramatic as those experienced over the past twenty years. There are several reasons for this expectation (e.g., that the future will be somewhat different than the past):

- Growth in the Services sector has matured and should track more closely with overall employment and population growth rather than continuing to gain a substantial share of total employment.
- The decline in Manufacturing was due, in part, to decreased timber harvests and the outsourcing of production to facilities in countries with lower costs. Timber harvests are expected to level off and increase in the future as commercial forests that were replanted since the 1970s grow to a harvestable size. While outsourcing will continue, much of what can be outsourced has already gone. Remaining Manufacturing firms are tied to their region to be near supplies or markets, or manufacture specialized goods where small production quantities, fast turn-around times, and the need for quality limit the ability to outsource.
- The mix of Manufacturing jobs in the Eugene-Springfield Region changed over the past twenty years with declines in Wood Products and the growth of employment in Recreational Vehicle (RV) manufacturing, machinery manufacturing, metals manufacturing, and high-tech industries, such as Computer and Electronics Manufacturing.

BUSINESS CLUSTERS IN SPRINGFIELD

One way to assess the types of businesses that are likely to have future growth in an area is to examine relative concentration and employment growth of existing businesses. This method of analysis can help determine relationships and linkages within industries, also called industrial clusters. Sectors that are highly concentrated (meaning there are more than the "average" number of businesses in a sector in a given area) and have had high employment growth are likely to be successful industrial clusters. Sectors with either high concentration of businesses or high employment growth may be part of an emerging cluster, with potential for future growth.

The sectors with the most growth potential (identified in Chapter 3) are: Health and Social Assistance; Administrative and Support; Construction;

and Accommodations and Food Services. Other sectors with growth opportunities are: Arts, Entertainment, and Recreation; Management of Companies and Enterprises; Professional, Scientific, and Technical Services; and Private Educational Services.

Table 4-1 shows existing and potential business clusters in Springfield. The clusters identified in Table 4-1 are based on employment trends, Springfield's comparative advantages, the OED's employment forecast for Lane County, the types of firms that have considered locating in Springfield, and analysis of existing and developing business clusters in Springfield and Lane County.

Table 4-1. Existing and potential business clusters in Springfield

Cluster	Employment Potential	Secondary Employment
Medical Services	Associated with RiverBend Regional Medical Center: 3,400 new jobs in 2008 Additional medical services Additional services Employment at a new or expanded McKenzie-Willamette Hospital Facility	Associated with RiverBend and McKenzie Willamette hospitals: Medical Services and Suppliers Research and Education Medical equipment manufacturing Non-medical office space Services like retail, restaurants, financial services, etc.
Manufacturing	Growth potential depends on firms growing locally or choosing to locate in Springfield. Types of firms include: <ul style="list-style-type: none"> • Food processing • High-tech electronics • Recreational Equipment • Medical Equipment manufacturing. • Furniture manufacturing • Specialty apparel • Cottage industries such as jewelry, apparel, or personal care products • Plastics manufacturing 	Manufacturing of related or complementary products Additional manufacturing Services like retail, restaurants, financial services, etc.
Wood Products and Specialty Wood Products	Growth potential depends on the international demand for wood products. The existing wood products and paper manufacturing cluster is evolving based on industry innovation.	Services like retail, restaurants, financial services, etc.
Call Centers	Growth potential depends on firms choosing to locate in Springfield. Eugene and Springfield have advantages for attracting call centers because of the pool of trained call center workers.	Back-office functions for companies with call centers Services like retail, restaurants, financial services, etc.

Cluster	Employment Potential	Secondary Employment
Back-Office Functions	Growth potential depends on firms growing locally or choosing to locate in Springfield. There is a lot of national competition for these functions.	Related back-office functions (if a cluster grows) Services like retail, restaurants, financial services, etc.
Tourism	Growth potential depends on holding events in the Eugene-Springfield area that attract visitors. Growth may also depend on development of infrastructure to attract and service visitors, such as hotels or outdoor activities.	Services like hotels, retail, restaurants, arts and entertainment, etc.
High-tech	Growth potential depends on firms growing locally or choosing to locate in Springfield. Types of firms include: <ul style="list-style-type: none"> • Software development • Computer electronics • Computer service providers • Data centers 	Service and materials providers Services like retail, restaurants, financial services, etc.
Biotech	Growth potential depends on firms choosing to locate in Springfield. There is a lot of national competition for these firms. Springfield has advantages in attracting these firms because of the University of Oregon's work in Biotech, presence of Invitrogen, and national growth in the industry.	Related biotech firms Suppliers or other specialized service providers Services like retail, restaurants, financial services, etc.

TARGET INDUSTRIES

Goal 9 requires cities to identify the number and characteristics of sites “the number of sites by type reasonably expected to be needed to accommodate the expected employment growth based on the site characteristics typical of expected uses (OAR 660-009-0014(2)).” In developing this assessment, cities are encouraged to examine existing firms in the planning area to identify the types of sites that may be needed for expansion (OAR 660-009-0015(2)). Cities are required to “estimate the types and amounts of industrial and other employment uses likely to occur in the planning area,” taking into consideration relevant economic advantages and disadvantages (OAR 660-009-0015(4)).

Identifying the number and characteristics of needed sites starts with understanding the types of businesses that may locate in Springfield over the 20-year planning period. Consistent with the requirements of Goal 9, these industries are grouped into “major categories of industrial or other employment uses” (OAR 660-009-0015(1)). This grouping is commonly referred to as “target industries.”

The target industries for Springfield were identified based on a range of factors:

- Springfield’s existing employment base and the clusters of businesses in Springfield, such as those shown in Table 4-1, Table A-12, or Table A-7.
- Springfield’s comparative advantages, especially Springfield’s location in the Southern Willamette Valley next to Eugene, the easy access to Interstate 5 in Springfield, and the availability of educated and trained labor force from across the region.
- Local and regional economic trends, such as changes in regional employment (Table A-5), changes in regional business clusters, growth in tourism (Table A-13), growth in agriculture production (Table A-14), or forecasts for regional employment growth (Table A-16).
- National and statewide economic trends over the last three decades, such as growth in services or decline in wood products manufacturing.
- Local and regional demographic trends, such as population growth and growth in people over age 60.
- Existing businesses and business clusters in Springfield, such as those identified in Table 4-1.
- Springfield’s economic development objectives, such as:
 - Increasing employment in regional clusters, including: Health Care, Communication Equipment, Information Technology (Software), Metals (Wholesalers), Processed Food and Beverage, Wood & Forest Products, and Transportation Equipment.
 - Recruiting businesses that pay higher than average wages for the region.

The characteristics of Springfield will affect the types of businesses most likely to locate in Springfield. Springfield’s attributes that may attract firms are: the City’s proximity to I-5, high quality of life, proximity to the University of Oregon, the presence of the RiverBend campus, positive business climate, availability of skilled and semi-skilled labor, and proximity to indoor and outdoor recreational opportunities. The types of businesses that may be attractive to Springfield include:

- **Medical Services.** The development of a regional medical center cluster at RiverBend presents an opportunity to attract medical

firms, medical research firms, and other professional services. PeaceHealth is in the process of attracting these firms, through development of a research-oriented relationship with OHSU and the University of Oregon. The possible expansion of the McKenzie-Willamette Medical Center in Springfield presents additional opportunities for attracting medical services and employment in healthcare.

- **Services for seniors.** Springfield's growing population of retirees or near retirees, may attract or create demand for health services that provide services to older people, such as assisted living facilities or retirement centers. These facilities may prefer to locate in relatively close proximity to RiverBend or McKenzie-Willamette.
- **Manufacturing.** Springfield's attributes may attract small scale manufacturing firms (e.g., firms with fewer than 50 employees). Springfield may also be attractive to large manufacturing firms, provided that land is available for development. Examples of manufacturing include medical equipment, high-tech electronics, recreational equipment, furniture manufacturing, specialty apparel, and other specialty manufacturing.
- **Specialty Food Processing.** Springfield's proximity to agricultural resources may make the City attractive to specialty food processing firms, such as those that specialize in organic or natural foods or wineries.
- **High-Tech.** Springfield's access to highly educated labor, access to comparatively inexpensive electricity, and high quality of life may make Springfield attractive to high-tech firms. The types of firms that may be attracted to Springfield range from high-tech manufacturing to data centers to software development.
- **Professional and Technical Services.** Springfield's attributes make it attractive to businesses that need access to educated workers and want a high quality of life. These types of businesses could include engineering, biotechnology, research, and other professional services that are attracted to high-quality settings.

Springfield's reputation as a blue-collar community may present challenges in attracting these types of businesses. Recent trends and efforts by the City suggest the reputation as a blue-collar community is in the process of changing. The City can facilitate this change through building off of the medical cluster forming at RiverBend and through promoting Springfield as a good place to locate professional service firms.

- **Call Centers.** The existing call center cluster including Symantec and Royal Caribbean may attract other call centers to Springfield. The potential for growth in call centers in the Eugene-Springfield area will be dependent of the availability of skilled labor.
- **Back-Office Functions.** Springfield's high quality of life and relatively low wages may attract back-office functions, such as Hawes Investments' offices in Springfield. Back-office functions include administrative functions, such as accounting or information technology. The potential for growth in back-office functions may be limited by national competition for this type of employment. Springfield may be more successful at attracting back-office functions for firms that have a reason to locate in the Region, such as firms with corporate headquarters on the West Coast or firms that do a substantial amount of business in the Willamette Valley.
- **Tourism.** Visitors may be attracted to Springfield to take advantage of recreational opportunities and other amenities. They may also be attracted as a result of regional events, such as the Olympic Track and Field trials, the Oregon Country Fair, or the University of Oregon Bach Festival. Industries that serve tourists, such as food services and accommodations, are likely to grow if tourism increases.
- **Green businesses.** There is no clear definition of what constitutes a green industry or business. In general, green businesses are those that produce products or services that improve or maintain environmental quality, as described in Appendix A. Opportunities for environmentally conscious businesses are growing. The types of green businesses that may choose to locate or expand in Springfield includes: green construction firms (e.g., firms that use LEED-certified building practices), organic food processing, sustainable logging and/or lumber products manufacturing, or alternative energy production (e.g., manufacturing solar panels or bio-fuels).
- **Corporate Headquarters.** Springfield's quality of life, location along I-5, and availability of educated workers may make Springfield attractive as a place to locate corporate headquarters. These same qualities, combined with the relatively low cost of semi-skilled labor and cluster of call centers, make Springfield attractive as a place to locate back-office functions, such as call centers.
- **Services for Residents.** Population growth will drive development of retail and government services, especially education, in Springfield.

- **Government and Public Services.** Springfield will continue to be the location for institutions such as: Springfield City Services, State services such as the Department of Motor Vehicles and Oregon Department of Transportation offices, the Springfield School District, and the Springfield Utility Board.

OAR 660-009-0025 requires cities designate sufficient land for employment to accommodate forecast needs. OAR 660-009-0025(1) and (2) articulate the requirements:

(1) Identification of Needed Sites. The plan must identify the approximate number, acreage and site characteristics of sites needed to accommodate industrial and other employment uses to implement plan policies. Plans do not need to provide a different type of site for each industrial or other employment use. Compatible uses with similar site characteristics may be combined into broad site categories. Several broad site categories will provide for industrial and other employment uses likely to occur in most planning areas. Cities and counties may also designate mixed-use zones to meet multiple needs in a given location.

(2) Total Land Supply. Plans must designate serviceable land suitable to meet the site needs identified in section (1) of this rule. Except as provided for in section (5) of this rule, the total acreage of land designated must at least equal the total projected land needs for each industrial or other employment use category identified in the plan during the 20-year planning period.

Thus, Springfield must identify the characteristics of “needed” sites and designate enough land to accommodate the needs. Table 4-2 shows a list of target industries and what plan designations in which the uses would be allowable. The conclusion is that each target industry is allowed in multiple plan designations.

Table 4-2. Target Industries and Plan Designations

Target Industry	Plan Designation										
	Campus Industrial	Commercial	Commercial Mixed Use	Heavy Industrial	High Density Residential Mixed Use	Light Medium Industrial	Light Medium Industrial Mixed Use	Major Retail Center	Medium Density Residential Mixed Use	Mixed Use	Special Heavy Industrial
Medical Services		✓	✓		✓		✓		✓	✓	
Services for Seniors		✓	✓		✓			✓	✓	✓	
Manufacturing	✓			✓		✓	✓			✓	✓
Specialty Food Processing	✓			✓		✓	✓			✓	✓
High-Tech	✓					✓	✓			✓	✓
Professional and Technical Services	✓	✓	✓		✓		✓	✓	✓	✓	
Call Centers	✓		✓				✓			✓	
Back Office Functions	✓		✓			✓	✓			✓	
Tourism		✓	✓				✓	✓		✓	
Green Businesses	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Corporate Headquarters	✓	✓	✓		✓		✓		✓	✓	
Services for Residents		✓	✓		✓		✓	✓	✓	✓	
Government and Public Services	✓	✓	✓							✓	

EMPLOYMENT FORECAST

To provide for an adequate supply of commercial and industrial sites consistent with plan policies, Springfield needs an estimate of the amount of commercial and industrial land that will be needed over the planning period. Goal 9 requires cities identify “the number of sites by type reasonably expected to be needed to accommodate the expected employment growth based on the site characteristics typical of expected uses.” The number of needed sites is dependent on the site requirements of employers. The estimate of land need is presented in the site needs analysis in the next section.

Demand for commercial and industrial land will be driven by the expansion and relocation of existing businesses and new businesses locating in Springfield. The level of this business expansion activity can be measured by employment growth in Springfield. This section presents a projection of future employment levels in Springfield for the purpose of estimating demand for commercial and industrial land.

The EOA presents a forecast for employment growth for Springfield for the 2010 to 2030 period. The City’s intent was to adopt this EOA in 2010 and the City noticed DLCD of this intent on October 30, 2009.²⁸ As a result, the employment forecast was developed in 2008 and is based on 2006 Quarterly Census of Employment and Wages (QCEW) data.

Appendix C presents the process used to arrive at the employment forecast for Springfield. Table 4-3 shows that employment is forecast to grow by 13,440 employees (a 32% increase) between 2010 and 2030.

²⁸ Springfield submitted a notice to adopt the 2009 Economic Opportunities Analysis on October 30, 2009. The date of the first evidentiary hearing in the notice was December 15, 2009, with a final hearing in July 2010. The purpose of this hearing was to provisionally adopt by resolution a draft Commercial and Industrial Building Lands Inventory, Economic Opportunities Analysis, Economic Development Objections and Implementation Strategies in order to carry out mandate of 2007 Or Laws Chapter 650 requiring Springfield to establish its own Urban Growth Boundary. The Resolution recognizes the that action was an interim step and that further steps were needed before adoption of a final inventory, analysis, and determination of capacity.

The City submitted notice with policy amendments to DLCD on December 31st, 2009, with a first evidentiary hearing on February 17, 2010. This notice included the 2009 Economic Opportunities Analysis.

Table 4-3. Employment growth in Springfield's UGB, 2010–2040

Year	Total Employment
2008	41,133
2010	42,284
2030	55,724
2030	55,724
2031	56,498
2032	57,283
2033	58,079
2034	58,886
2035	59,704
2036	60,534
2037	61,375
2038	62,228
2039	63,093
2040	63,970
Change 2010 to 2030	
Employees	13,440
Percent	32%
AAGR	1.4%

Source: ECONorthwest

Springfield is part of the regional economic center in the Southern Willamette Valley region. The ratio of population to employment will decrease from 1.6 people per job to 1.5 people per job between 2008 and 2030. This change shows that employment will grow faster than population in Springfield, suggesting that some Springfield businesses will continue to have employees who commute from Eugene or other cities in the region.

Table 4-4 shows the forecast of employment growth by building type in Springfield's UGB in 2030. In 2010, a total of about 60% of Springfield's employment is in office and other services' building types. About 18% is in retail, 15% is in general industrial and 7% is in warehousing and distribution.

For the purpose of the Springfield EOA, building types are used to relate employment by industry to site needs. In short, the method used to describe site needs is to group industries based on building and site characteristics. This is consistent with how real estate markets work for urban development – demand for land is derived from demand for space. The type of building and industry is then related to land characteristics needed (e.g., site needs) to accommodate that industry. It is also consistent with OAR 660-009-0015(1) which states "Industrial or other employment uses with compatible site characteristics may be grouped together into

common site categories. “ For this analysis, ECO relates industries by NAICS codes to building types which are used as a proxy for site needs. Each sector has been uniquely assigned to a “typical” building type, grouped by industrial and commercial uses. Table A-8 in the appendix shows how industries are related to building types and site needs.

Table 4-4. Forecast of employment growth in by building type, Springfield UGB, 2010-2030

Building Type	2010		2030		Change 2010 to 2030
	Employment	% of Total	Employment	% of Total	
Industrial					
Warehousing & Distribution	2,954	7.0%	3,343	6.0%	389
General Industrial	6,457	15.3%	7,523	13.5%	1,066
Commercial					
Office	12,561	29.7%	17,274	31.0%	4,713
Retail	7,709	18.2%	9,752	17.5%	2,043
Other Services	12,603	29.8%	17,832	32.0%	5,229
Total	42,284	100.0%	55,724	100.0%	13,440

Source: ECONorthwest

Note: Green shading denotes an assumption by ECONorthwest

Note: The forecast assumes that the share of employment in other services' building types will increase by about 2.2% over the 20-year period. We expect that medical employment will grow faster than government employment, based on historical trends that show government accounting for a decreasing share of employment and the growing medical cluster in Springfield.

The forecast in Table 4-4 assumes that Springfield will have growth in all categories of employment. It also assumes that the share of employment will increase in other services (2.2% increase in share) and office (1.3% increase in share). At the same time, the share of employment will decrease in general industrial (1.8% decrease in share), warehousing and distribution (1.0% decrease in share), and retail (0.7% decrease in share). The rationale supporting these assumptions is presented in Appendix C.

SITE NEEDS

OAR 660-009-0015(2) requires the EOA identify the number of sites, by type, reasonably expected to be needed for the 20-year planning period. Types of needed sites are based on the site characteristics typical of expected uses. The Goal 9 rule provides flexibility in how jurisdictions conduct and organize this analysis. For example, site types can be described by plan designation (i.e., heavy or light industrial), they can be by general size categories that are defined locally (i.e., small, medium, or large sites), or it can be industry or use-based (i.e., manufacturing sites or distribution sites).

Firms wanting to expand or locate in Springfield will be looking for a variety of site and building characteristics, depending on the industry and specific circumstances. Previous research conducted by ECO has found

that while there are always specific criteria that are industry-dependent and specific firm, many firms share at least a few common site criteria. In general, all firms need sites that are relatively flat, free of natural or regulatory constraints on development, with good transportation access and adequate public services. The exact amount, quality, and relative importance of these factors vary among different types of firms. This section discusses the site requirements for firms in industries with growth potential in the Eugene-Springfield Region, as indicated by the Oregon Employment Department forecast (see Table A-12 in Appendix A for the regional forecast).

Appendix C discusses the productive factors that affect business' locational decisions and the implications of these factors for businesses that may locate in Springfield. The appendix also discusses the characteristics of sites needed to accommodate employment growth and Springfield's ability to provide sites with these characteristics.

LONG-TERM LAND AND SITE NEEDS

Appendix C presents the process for converting between the employment forecast to site needs. Table 4-5 presents the estimate of needed sites by site size and type of building. The results show that Springfield needs approximately 273 sites. Most sites are small, 2-acres or less. Springfield needs approximately 24 sites larger than 5-acres, including 4 sites larger than 20-acres.

Table 4-5. Estimated needed sites by site size and building type, Springfield, 2010 to 2030

	Site Size (acres)					Total
	Less than 1	1 to 2	2 to 5	5 to 20	20 and Larger	
Warehousing & Distribution	2	2	3	4	1	12
General Industrial	5	5	4	8	2	24
Office	75	12	13	4	1	105
Retail	55	10	6	2		73
Other Services	44	9	4	2		59
Total	181	38	30	20	4	273

Source: ECONorthwest

The identified site needs shown in Table 4-5 do not distinguish sites by comprehensive plan designation. It is reasonable to assume that industrial uses will primarily locate in industrial or campus industrial zones. Retail and service uses could locate in commercial zones, mixed use zones, and residential mixed-use zones.

SHORT-TERM SITE NEEDS

Springfield has four large-scale development plans currently underway: RiverBend Node, Marcola Meadows Node, the Glenwood Riverfront Node and the Downtown District Node. RiverBend, Marcola Meadows and Glenwood Riverfront District have approved master plans and are available for immediate development. In addition, the City is currently developing a Downtown District Plan and Implementation Strategy to facilitate and promote downtown redevelopment.

- **RiverBend Node.** PeaceHealth’s main hospital at RiverBend opened in August 2008. The relocation or expansion of other medical firms to the RiverBend campus is underway. In addition to these uses, PeaceHealth plans further development of the RiverBend campus, which is about 72 acres in size. Other uses may include a mixture of residential development, office and commercial support services, retail, and educational and research functions to support collaborations with Oregon Health Services University and the University of Oregon. Studies for the RiverBend master plan indicated that there may be demand for additional office development (400,000-500,000 square feet) and commercial retail services (50,000 to 70,000 square feet).
- **Marcola Meadows Node.** Marcola Meadows is a master-planned proposed mixed use project located on a vacant 100-acre parcel in Springfield. The project is expected to include about 190 single unit detached homes, about 120 townhouses, about 120 homes in apartments, and 54 homes for senior living. The total proposed land requirement of the residential village would be 39 acres.

The Marcola Meadows Master Plan includes a commercial anchor development, professional offices and retail. The planned commercial component will occupy about 44 acres. The remaining land in the development will be used for common open space and streets.²⁹

- **Glenwood Node.** Glenwood currently has a mixture of residential, commercial, and industrial zoning, with areas that are underdeveloped or undeveloped. Glenwood’s current development pattern is: 83 acres of industrial land, 64 acres of retail, 66 acres of manufactured dwellings, 37 acres of single-family dwellings, and 167 acres of vacant land.

²⁹ Marcola Meadows Pre Plan.

Redevelopment of Glenwood is in the planning stages. The 48-acre Glenwood Riverfront Plan District is currently designated for Mixed Use Nodal Development and is available for development. The City is updating the Glenwood Refinement Plan for the rest of Glenwood in phases. Goals for redevelopment include developing residential, employment and mixed use areas, providing transition between residential and industrial areas, and capitalizing on Glenwood's location between Eugene and Springfield and riverfront land.³⁰

³⁰ Glenwood Refinement Plan. November 1999.

Land Capacity and Demand

This chapter provides a brief summary of the implications of the economic opportunities needs analysis for the City of Springfield. This study looked at economic trends and land needs from a regional and local perspective. This chapter includes a general comparison of land supply and demand. The comparison of land capacity and demand is followed by a discussion of the key implications of the EOA for the City of Springfield.

COMPARISON OF LAND CAPACITY AND DEMAND

This section presents an analysis of land availability and capacity for employment uses in Springfield. Chapter 4 presents an analysis of potential growth industries in Springfield and the employment forecast for Springfield. Based on this analysis, Table 5-1 shows a comparison of land supply and need in terms of sites by site size.

Redevelopment Capacity

The City makes the following assumptions about redevelopment of industrial and commercial land:

- All sites 5 acres and smaller that were identified as having redevelopment potential may redevelop over the 2010-2030 period.
- Five sites between 5-20 acres and one site 20 acres and larger are likely to redevelop over the 2010-2030 period. Table 2-12 provides a site-by-site evaluation of redevelopment potential for sites larger than 5 acres.

Table 5-1 uses the inventory of buildable vacant land from Chapter 2.

- **Vacant land.** The vacant land summary in Table 5-1 is summarized from Table 2-9.
- **Redevelopable land.** The redevelopable land summary in Table 5-1 makes two assumptions about redevelopment potential:³¹
 - *Sites smaller than five acres.* All of the sites smaller than 5 acres with redevelopment potential in Table 2-11 are shown in Table 5-1.
 - *Sites larger than five acres.* Table 2-12 presents a site-by-site evaluation of redevelopment potential of sites identified as potentially redevelopable in Table 2-11. Table 5-1 includes all of the sites identified as providing an opportunity for redevelopment of a 5-acre site (in Table 2-12) as potentially redevelopable sites over the planning period.

The results show that Springfield has a deficit of about 2 industrial sites and 7 commercial and mixed use sites.

³¹ The redevelopable sites in Table 5-1 are assumed to increase employment capacity on the redeveloped sites. As discussed in Chapter 2, redevelopment means a net increase in employment capacity, rather than only the replacement of an old building with a newer building.

Table 5-1. Comparison of vacant land supply and site needs, industrial and other employment land, Springfield UGB, 2010-2030

	Site Size (acres)				
	Less than 1	1 to 2	2 to 5	5 to 20	20 and Larger
Buildable Land Inventory					
Vacant					
Industrial	72	24	20	12	0
Commercial and Mixed Use	104	14	6	4	0
Potentially Redevelopable					
Industrial	122	28	31	6	1
Commercial and Mixed Use	305	20	15	0	0
Total Buildable Sites					
Industrial	194	52	51	18	1
Commercial and Mixed Use	409	34	21	4	0
Site Needs					
Needed sites					
Industrial	7	7	7	12	3
Commercial and Mixed Use	174	31	23	8	1
Surplus (deficit) of sites					
Industrial	187	45	44	6	-2
Commercial and Mixed Use	235	3	-2	-4	-1

Source: ECONorthwest.

Note: The redevelopable sites in Table 5-1 are assumed to increase employment capacity on the redeveloped sites. As discussed in Chapter 2, redevelopment means a net increase in employment capacity, rather than only the replacement of an old building with a newer building.

Converting the site needs shown in Table 5-1 to an estimate of land needs requires making assumptions about average site sizes needed in Springfield. The average site sizes in Table 5-2 are based on empirical analysis of the size of Industrial and Commercial taxlots with employment in Springfield in 2006. This analysis involved relating covered employment data (covered employment in Springfield is shown in Table C-1) to taxlots in Springfield. The taxlots were grouped into categories of site size (i.e., less than 1 acre, 1-2 acres, etc.) by type of land (i.e., industrial or commercial/mixed-use). For each group, the average site size was determined, as shown in Table 5-2. For example, there were 75 Industrial sites smaller than 1 acre in Springfield with employment, with an average of 0.5 acres per site.

Table 5-2. Average size of needed sites based on average sizes of sites with employment in Springfield, Springfield UGB

	Site Size (acres)				
	Less than 1	1 to 2	2 to 5	5 to 20	20 and Larger
Industrial	0.5	1.4	3.0	10.0	63.0
Commercial and Mixed Use	0.4	1.4	3.2	9.3	60.0

Source: ECONorthwest based on QCEW data

Note: Average site size for sites 20 acres and larger is rounded to the nearest acre.

Table 5-3 shows sites needed (from Table 5-1) and land need (based on number of sites needed in Table 5-1 and average site size in Table 5-2). The results show that Springfield has a deficit in the current UGB of the following land types for the 2010 to 2030 period:

- **Industrial land.** Springfield has a **need for 126 acres** of industrial land on two sites larger than 20 acres. In the context of this study, industrial uses means any major employer that would be allowed in an industrial land designation (e.g., campus industrial, light-medium industrial, light-medium industrial mixed use, heavy industrial, or special heavy industrial).
- **Commercial sites.** Springfield has a **need for 104 acres** of commercial land on 9 sites. Springfield's commercial site needs range from sites 2 to 5 acres in size to one site that is 60 acres in size. In the context of this study, commercial use means any use that would be allowed in a commercial land designation (e.g., commercial, commercial mixed use, employment mixed use).

Table 5-3. Comparison of employment land supply and site needs, Springfield UGB, 2010-2030

	Site Size (acres)					Total
	Less than 1	1 to 2	2 to 5	5 to 20	20 and Larger	
Industrial						
Sites needed	none	none	none	none	2	2
Land need (acres)	none	none	none	none	126	126
Commercial and Mixed Use						
Sites needed	none	none	2	4	1	7
Land need (acres)	none	none	6	37	60	104
Total sites needed	none	none	2	4	3	9
Total acres needed	none	none	6	37	186	230

Source: ECONorthwest

The summary of land needs in Table 5-3 shows Springfield's land need for all sites of all sizes. One of the City's economic development strategies is to encourage redevelopment, especially in Downtown and Glenwood. Table 5-1 shows that Springfield concludes that 188 industrial sites and 340 commercial and mixed use sites would redevelop to address land needs over the 20-year period. In addition to this assumption about redevelopment, **Springfield concludes that all land needs on sites smaller than five acres would be accommodated through redevelopment.** The City had a deficit of two commercial and mixed use sites smaller than five acres, which would require six acres of land (Table 5-3).

Table 5-4 shows Springfield's employment land need, assuming that all site needs for sites smaller than five acres would be addressed through redevelopment. **Springfield has the need for approximately two**

industrial sites on 126 acres and five commercial and mixed use sites on about 97 acres that cannot be accommodated within the existing UGB over the 2010 to 2030 period.

Table 5-4. Employment site and land needs, Springfield UGB, 2010-2030

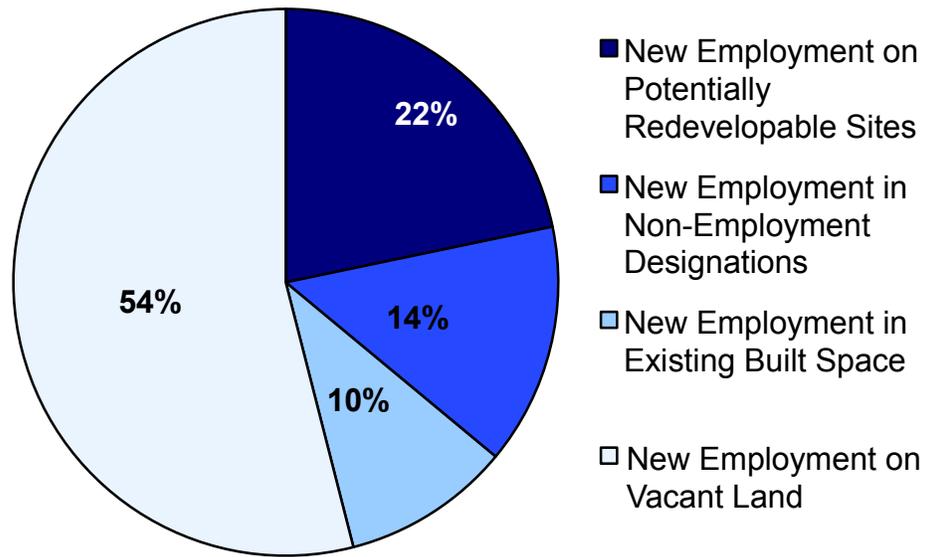
	Site Size (acres)			Total
	Less than 5	5 to 20	20 and Larger	
Industrial				
Sites needed	none	none	2	2
Land need (acres)	none	none	126	126
Commercial and Mixed Use				
Sites needed	none	4	1	5
Land need (acres)	none	37	60	97
Total sites needed	none	4	3	7
Total acres needed	none	37	186	223

Source: ECONorthwest

Figure 5-1 summarizes how Springfield will accommodate new employment based analysis in Chapter 5 and Appendix C. Springfield's employment forecast shows growth of 13,440 new employees over the planning period (Table C-2).

- 14% of new employment (1,918 employees) will locate on **land not designated for employment use**, such as residential land (Table C-12).
- 10% of new employment (1,344 employees) will locate in **existing commercial or industrial built space**, such as vacant buildings or office spaces (Table C-12).
- 22% of new employment (about 2,921 employees) will locate on **potentially redevelopable sites**, where redevelopment results in an increase in the amount of employment accommodated on the site (Table 5-1 shows assumptions about potentially redevelopable sites and Table C-6 shows that need for sites smaller than 5 acres will be accommodated through redevelopment).
- 54% of new employment (about 7,256 employees) will locate on **land that is currently vacant**, including land within the UGB and sites that Springfield does not currently have within the UGB (Table 5-1 and Table C-6).

Figure 5-1. Summary of Location of Employment Growth by Type of Land, Springfield UGB, 2010-2030



Source: ECONorthwest

CHARACTERISTICS OF NEEDED SITES

The Goal 9 Administrative Rule (OAR 660-009) requires that jurisdictions describe the characteristics of needed sites (OAR 660-009-0025(1)). The Administrative Rule defines site characteristics as follows in OAR 660-009-0005(11):

(11) "Site Characteristics" means the attributes of a site necessary for a particular industrial or other employment use to operate. Site characteristics include, but are not limited to, a minimum acreage or site configuration including shape and topography, visibility, specific types or levels of public facilities, services or energy infrastructure, or proximity to a particular transportation or freight facility such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes.

The site needs analysis in Chapter 4 identified site needs in five types of buildings: warehousing and distribution, general industrial, office, retail, and other services. The characteristics of needed sites for each of these building types are described below. All sites will need access to electricity, phone, and high-speed telecommunications.

The demand for employment sites (summarized in Table 5-1) is driven by expected employment growth in industries that have historically needed sites in different size groupings. Table C-6 shows that Springfield has a deficit of two Industrial sites 20 acres and larger, which may be needed by target industries such as light manufacturing, high-tech manufacturing, recreation equipment manufacturing, wood products manufacturing, medical products manufacturing, alternative energy manufacturing, or specialty food processing.

Springfield also has a deficit of Commercial and Mixed Use sites, including: four site 5 to 20 acres in size and one site 20 acres and larger. The target industries that may locate on these sites include: Medical Services, Professional and Technical Services, Back-Office Functions, Call Centers, or Corporate Headquarters. Table 4-2 summarizes the Comprehensive Plan Designations where Springfield's target industries are allowed within Springfield's existing UGB.

This section describes the site needs of these target industries, focusing on the deficit of 223 acres of employment land in Springfield identified in Table 5-4.

SITE SIZE AND OTHER CHARACTERISTICS

This section presents information about the sites needed by the target industries based on information by Business Oregon, economic development efforts in Springfield, a study about industry site needs in Springfield by Tadzo, and other sources. Appendix C (Tables C-6 to C-11) present details of research about site needs of Springfield's target industries from these sources. Table 5-5 summarizes these site needs.

Table 5-5. Summary of characteristics of sites needed by target industries, Springfield

Type of site and target industries	Site Size	Topography	Transportation Access	Access to City Services
<p>Target Industries: Medical Equipment High-tech Electronics and Manufacturing Recreational Equipment Furniture Manufacturing Specialty Food Processing Building Type: General Industrial Site Needs for: Manufacturing</p>	<p>Manufacturers similar to the target industries that needed sites larger than 5 acres who considered locating in Oregon or in the Eugene-Springfield area needed sites ranging in size from 10 acres to more than 100 acres.</p> <p>The size of sites needed by Springfield’s target industries will vary by the size of building: 100,000 sq ft building will need a site of between 9-12 acres 200,000 sq ft building will need a site of between 18-24 acres 500,000 sq ft building will need a site of between 45- 60 acres</p> <p>The average size of existing sites with employment in Springfield (Table 5-2) is: 5-20 acre site: 10 acres 20+ acre site: 63 acres</p>	<p>The slope for manufacturing sites should be 5% or less. High-tech and Campus manufacturing can have a slope of 7% or less.</p>	<p>At the furthest, sites should be located within 15 miles or less of I-5 or a principal arterial road that is designated as a freight route. Most businesses in Springfield typically locate within one-mile of I-5 or within about one-half a mile of a state highway.</p>	<p>Access to Springfield’s municipal water and wastewater system, with a minimum pipeline size of 8 to 10 inches (varies by target industry).</p>
<p>Target Industries: High Tech Services Corporate Headquarters Biotech Professional and Technical Services Back office Medical Services Building Type: Commercial and Other Site Needs for: Large Office Employers</p>	<p>Commercial office employers that needed sites larger than 5 acres who considered locating in Oregon needed sites ranging in size from 10 acres to 100 acres.</p> <p>The size of sites needed by Springfield’s target industries will vary by the size of building: 50,000 sq ft building will need a site of between 4- 6 acres 100,000 sq ft building will need a site of between 8-12 acres 200,000 sq ft building will need a site of between 16-24 acres</p> <p>If a business park is developed to meet the site needs of these businesses, typical business park sizes in the Portland region are between about 30 and 75 acres.</p> <p>The average size of existing sites with employment in Springfield (Table 5-2) is: 5-20 acre site: 9.3 acres 20+ acre site: 60 acres</p>	<p>The slope for manufacturing sites should be 5% or less. High-tech and Campus manufacturing can have a slope of 7% or less.</p>	<p>At the furthest, sites should be located within 15 miles or less of I-5 or a principal arterial road. Most businesses in Springfield typically locate within one-mile of I-5 or within about one-half a mile of a state highway.</p> <p>Sites should have access to mass transit within one-half mile.</p>	<p>Access to Springfield’s municipal water and wastewater system, with a minimum pipeline size of 8 to 10 inches (varies by target industry).</p>

SITE NEEDS FOR SPRINGFIELD'S TARGET INDUSTRIES

This section presents a refinement of the discussion of the characteristics of needed sites in Springfield on pages 59 to 63 of the EOA to describe the connection between the typical site need and operations of target industries.

The Goal 9 Administrative Rule (OAR 660-009) requires that jurisdictions describe the characteristics of needed sites (OAR 660-009-0025(1)). The Administrative Rule defines site characteristics as follows in OAR 660-009-0005(11):

(11) "Site Characteristics" means the attributes of a site necessary for a particular industrial or other employment use to operate. Site characteristics include, but are not limited to, a minimum acreage or site configuration including shape and topography, visibility, specific types or levels of public facilities, services or energy infrastructure, or proximity to a particular transportation or freight facility such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes.

In *Friends of Yamhill County v. City of Newberg*, 62 Or LUBA 5 (2010), LUBA provided a recent interpretation of this requirement, by applying a “two-prong test” for establishing relevant site characteristics as follows: (1) that the attribute be “typical of the industrial or employment use” and (2) that it have “some meaningful connection with the operation of the industrial or employment use.” The first of those prongs, that the attributes be “typical,” appears expressly in OAR 660-009-0015(2), which refers to “site characteristics typical of expected uses.” In upholding LUBA’s two prong test, the Court of Appeals agreed, “[t]hat ‘necessary’ site characteristics are those attributes that are reasonably necessary to the successful operation of particular industrial or employment uses, in the sense that they bear some important relationship to that operation.” *Friends of Yamhill County v. City of Newberg*, 240 Or App 738, 747 (2011).

TARGET INDUSTRIES: MANUFACTURING

Springfield identified the following types of target industries in manufacturing (as part of the General Industrial employment category) that require sites 5 acres and larger: medical equipment, high-tech electronics and manufacturing, recreational equipment, furniture manufacturing, specialty food processing. Table 5-1 shows that Springfield has a deficit of two sites larger than 20 acres to accommodate these types of manufacturing businesses, with an average site size of 63 acres. Manufacturing is most likely to occur in an industrial or campus industrial zone.

The following summarizes the site characteristics and provides an overview of the two-prong test established for site characteristics under *Friends of Yamhill County v. City of Newberg*, 62 Or LUBA 5 (2010), *aff'd* 240 Or App 738 (2011).

1. **Site size.** Sites where manufacturing firms might locate range in size from 10 to 20 acres and up to 60 acres or more for large-scale manufacturers. Springfield has a deficit of two sites in the site size of “20 acres and larger,” which have an average site size of 63 acres.
 - Attribute has "some meaningful connection with the operation of the industrial or employment use" – Site size is important for manufacturers. The site needs to be large enough to accommodate the needed built space, as well as accommodate storage space or space for phased development. In addition, the site needs to be large enough to accommodate dedication of public right-of-way and/or easements that may be needed to extend or increase the capacity of existing transportation, infrastructure and utilities to serve the manufacturing use, on-site circulation, parking and loading, on-site stormwater management, waste management, and to meet applicable site coverage or open space requirements, and applicable land use or natural resource buffers required through the City’s development or building code regulations.

Table C-7 shows employment estimates for manufacturing businesses that considered locating in the Eugene-Springfield area. Size of site is generally connected to levels of employment, with larger amounts of employment generally locating on larger sites.

- Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(11) specifically cites “a minimum acreage” as a site characteristic. The average size of existing industrial employment sites larger than 20 acres in Springfield is 63 acres (Table 5-2).

In addition, Business Oregon finds that competitively sized general manufacturing firms are 10 acres in size and high-tech manufacturing or campus industrial manufacturing require 25-acre sites. Industrial businesses that considered locating in the Eugene-Springfield area needed sites ranging in size from 10 acres to 200 acres or larger. The Tadzo report concludes that manufacturers in Springfield’s target industries that need a 200,000 square foot building require

sites between 18 and 24 acres and businesses that need a 500,000 square foot building need sites between 45 and 60 acres in size. Major employment sites with industrial uses in the Portland Metro area range in size from 25 to 160 acres and average about 50 acres in size.

2. **Topography.** Manufacturing sites should be relatively flat, with slopes of not more than 7% and preferably no more than 5%. Consistent with OAR 660-009-0005(2), Springfield considers sites with slopes over 7% to be unsuitable for manufacturing uses.
 - Attribute has "some meaningful connection with the operation of the industrial or employment use" - Business Oregon identifies sites with a slope of less than 5% (or less than 7% for High Tech Manufacturing or Campus Industrial) as necessary for a competitive site. Manufacturing buildings require level floor plates to support efficient physical layout of equipment, materials staging, assembly, packing and loading processes, reducing costs and offering maximum flexibility, as well as level areas to provide for freight access and pedestrian walkways that meet ADA standards. The real estate development literature describes the increases in development costs and other difficulties associated with industrial development on a sloped site.
 - Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(11) specifically cites "site configuration including shape and topography" as a site characteristic. Business Oregon finds that competitive sites generally have a slope of 5% or less, except high tech manufacturing and campus industrial, which have a slope of 7% or less.
3. **Transportation Access.** Manufacturing buildings generally are located on arterial or major collector streets. Sites need to have unimpeded access within 15 miles of an interstate highway or principal arterial road that is designated as a freight route, based on analysis from Business Oregon (Table C-8).

Many businesses in Springfield, especially the large businesses like those in Springfield's target industries, are located as close to Interstate 5 or a state highway as possible. Map A-1 and Map A-2 show the location of employers in Springfield. Much of Springfield's employment base, especially large employers, is clustered in the Gateway area, within one mile (or less) of I-5. Most other employers are located along or within one-quarter to one-half mile of a state highway.

- Attribute has "some meaningful connection with the operation of the industrial or employment use" - Distance from transportation facilities is meaningful because it directly affects the industry's time, labor, and fuel costs. Cost efficient freight movement is necessary for effective and economical manufacturing operations. Designated Federal, State, and local freight routes have design features that ensure freight vehicle movement and weight. This attribute is meaningful to industry operations because it directly affects the industry's travel time, labor and fuel costs to use lower classification, slower speed streets that are designed for local traffic

Unimpeded access to designated freight routes that are designed and constructed to ensure passage of freight vehicle sizes and weights is meaningful to the operation of the manufacturing use because it directly affects the industry's ability to move its freight vehicles. Local streets are not designed and built to accommodate heavy freight vehicles. Avoiding use of the local street network minimizes traffic conflicts with adjacent residential land uses along streets not designed for freight vehicles and higher traffic volumes. This site characteristic also helps to minimize traffic conflicts on local streets, improve mobility, minimize adverse effects on urban land use and travel patterns, and provide for efficient long distance travel, which are all necessary for effective industrial operations.

- Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(11) specifically cites the "proximity to a particular transportation or freight facility such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes" as a site characteristic. Business Oregon finds that manufacturing and industrial firms need to be located relatively close to an interstate highway or principle arterial road, generally within 15 minutes or less, for shipping freight. The literature about siting of industrial buildings, including manufacturing, is clear that manufactures must be adjacent to a major transportation facility to optimize supply chain flows and delivery response time.³² Most businesses in Springfield are located within one-mile of Interstate 5 or within one-half mile of a state highway.

³² *Business Park and Industrial Development Handbook*, Urban Land Institute, 2001.

4. **Access to services.** City services should be directly accessible to the site, including sanitary sewer, and municipal water. The pipeline must be at least 8 inches and some manufacturers may require a 10 inch pipe minimum for both water and wastewater. Some target industries, such as high tech or specialty food processing, may require higher volumes of water and wastewater treatment.
- Attribute has "some meaningful connection with the operation of the industrial or employment use" - Industrial buildings require access to municipal water, municipal sanitary sewer, and electricity/gas. At a minimum, manufacturers must have access to water and wastewater for typical manufacturing uses. Some manufacturers, such as high tech or specialty food processors, may require water and wastewater services as part of their manufacturing process. Developing a site with direct access to municipal services is substantially more cost-effective than extending municipal services to an unserved site.³³
 - Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(11) specifically cites the "specific types or levels of public facilities, services or energy infrastructure" as a site characteristic. Business Oregon finds that competitive sites must have access to urban services, including water, wastewater, natural gas, electricity, and major telecommunications facilities.
5. **Land assembly.** Sites may include one or more tax lots. Sites with two or fewer owners are necessary (a single owner is most desirable) to reduce the cost and uncertainty of land assembly. Consistent with OAR 660-009-0005(2), Springfield considers parcel fragmentation as a development constraint that directly affects suitability as defined in OAR 660-009-0005(12).
- Attribute has "some meaningful connection with the operation of the industrial or employment use" - The cost of land assembly, in financial terms and in terms of extra time needed for site assembly, can make developing an industrial site with multiple land owners infeasible, resulting in the business choosing not to build on the site and possibly not locating in Springfield.

³³ Miles, Mike E., Haney, Richard L., Bernes, Gayle, "Real Estate Development: Principles and Process," The Urban Land Institute, 1997.

- Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(2) specifically lists parcel fragmentation as a development constraint that “ temporarily or permanently limit or prevent the use of land for economic development.” Developing an industrial building on a site with more than two owners requires negotiating land assembly and purchase from multiple owners. Land assembly is difficult and often costly for a number of reasons. People own land for a variety of reasons, such as desire to develop the land, desire to keep the land undeveloped, desire to sell the land for a profit. Getting land owners to sell land can be difficult, especially if the ownership is legally disputed, such as in the case of inheritance cases. If a landowner is a willing seller, they may have an unrealistic expectation of their land’s value, in the context of comparable land values. In addition, one parcel of land may have multiple owners, compounding the issues described above.

Developers attempting land assembly often have difficulty assembling a site at a cost that makes development economically viable. When assembling land, developers often find that owners of key sites are not willing sellers, have unrealistic expectations of the value of their land, or cannot get agreement among multiple owners to sell the land. As a result, developers of industrial buildings typically choose to develop sites with one or two owners.

TARGET INDUSTRIES: LARGE OFFICE EMPLOYERS

Springfield identified the following types of large office employers as target industries that require sites of five acres or larger: high tech, corporate headquarters, biotech, professional and technical services, back office, and medical services. These and other target industries may locate on stand-alone sites or may locate in business parks. The types of buildings may be typical office buildings, flex buildings,³⁴ or multiple buildings in a “campus” environment.

Large office employers are likely to locate in commercial or mixed-use zones, with some large office employers (e.g., high tech, biotech,

³⁴ Flex space is buildings that could be used for light industrial, office space, or both. Flex space typically has less costly finishing and improvements, such as having bare concrete floors rather than carpet. Businesses that sometimes occupy flex space include plumbing or electrical contractors, computer technology companies such as internet service providers or some software businesses, or service firms that prefer a more “industrial” feeling to their office space, such as some architecture firms.

professional or technical services, back office) locating in mixed-employment zones, such as campus industrial. Table C-6 shows that Springfield has a deficit of four site 5 to 20 acres in size (average site size of 9.3 acres) and one site 20 acres and larger (average site size of 60 acres).

The following summarizes the site characteristics and provides an overview of the two-prong test established for site characteristics under *Friends of Yamhill County v. City of Newberg*, 62 Or LUBA 5 (2010), *aff'd* 240 Or App 738 (2011).

1. **Site size.** Sites for office, flex, and business parks where businesses might locate range in size from 10 to 20 acres in size to 75 or 100 acre business parks to very large (multi-hundred acre) sites for large employers.
 - Attribute has "some meaningful connection with the operation of the industrial or employment use" - Site size is important for businesses locating in office, flex, or business parks. The site needs to be large enough to accommodate the needed built space. In addition, the site needs to be large enough to accommodate commercial activities, meet landscaping requirements, meet parking requirements, dedication of public right-of-way and/or easements that may be needed to extend or increase the capacity of existing transportation or infrastructure to serve the businesses, on-site stormwater management, waste management. Sites must also be large enough to meet applicable site coverage or open space requirements, and applicable land use or natural resource buffers required through the City's development or building code regulations.
 - Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(11) specifically cites "a minimum acreage" as a site characteristic. The Tadzo report concludes that large employers in target industries (e.g., Back Office, Corporate Headquarters, and Professional and Technical Services) may require sites of 8 to 12 acres to 100,000 square foot buildings or sites of 16 to 24 acres for 200,000 square foot buildings. These and other target industries may locate in business parks. Key characteristics of business parks in the Portland Metro region are sites of 25 to 100 acres, with 500,000 to 750,000 square feet of built space.
2. **Topography.** Sites for office, flex, and business parks businesses should be relatively flat, with slopes of not more than 15%. Consistent with OAR 660-009-0005(2), Springfield considers sites with slopes over 15% to be unsuitable for large office employers.

- Attribute has "some meaningful connection with the operation of the industrial or employment use" - Commercial developments can occur on land with low- to moderate slopes. For the purposes of this analysis, including in the buildable lands inventory, the maximum slope that is appropriate for commercial development is 15%. Commercial buildings on sites with higher slope pose engineering challenges that increases costs and reduces building flexibility, as well as pose challenges for freight delivery. In addition, client and employee access is an important factor in commercial buildings. Sites with steeper slopes will require greater investment in pedestrian walkways that meet ADA standards. The real estate development literature describes the increases in development costs and other difficulties associated with commercial development on a more sloped site.
 - Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(11) specifically cites "site configuration including shape and topography" as a site characteristic. Commercial sites, including the business parks and office developments in Portland, are generally relatively flat.
3. **Transportation Access.** Commercial office, flex, and business park buildings generally locate on arterial or major collector streets, to ensure that there is sufficient automotive access for employees and customers, as well as for the visibility of a location along a major road. Large office, flex, and business park buildings need to have access to an arterial or state highway. In addition, transit access is important for Springfield's commercial office, flex, and business park buildings, especially those with many employees and customers and for businesses that employ and serve segments of the population without access to an automobile.

Many businesses in Springfield, especially the large businesses like those in Springfield's target industries, are located as close to Interstate 5 or a state highway as possible. Map A-1 and Map A-2 show the location of employers in Springfield. Much of Springfield's employment base, especially large employers, is clustered in the Gateway area, within one mile (or less) of I-5. Most other employers are located along or within one-quarter to one-half mile of a state highway. Large office employers that have located in Springfield over the last decade have located in the Gateway area, such as RiverBend Hospital, Symantec, Pacific Source, or Royal Caribbean Cruise Lines.

- Attribute has "some meaningful connection with the operation of the industrial or employment use" - This site characteristic helps to minimize the amount of traffic on local streets, minimize commercial traffic in residential neighborhoods, improve mobility, minimize adverse effects on urban land use and travel patterns, and provide for efficient long distance travel, which are all necessary for effective commercial operations. A location with access to an arterial or state highway will have greater visibility, which is important to businesses that depend on in-person customer access. A location with access to mass transit within one-half mile will provide transportation opportunities for employees and customers without access to an automobile.
 - Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(11) specifically cites the "proximity to a particular transportation or freight facility such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes" as a site characteristic.
4. **Access to services.** City services should be directly accessible to the site, including sanitary sewer, and municipal water.
- Attribute has "some meaningful connection with the operation of the industrial or employment use" - Commercial buildings require access to municipal water, municipal sanitary sewer, and electricity/gas. Developing a site with direct access to municipal services is substantially more cost-effective than extending municipal services to an unserved site.³⁵
 - Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(11) specifically cites the "specific types or levels of public facilities, services or energy infrastructure" as a site characteristic.
5. **Land ownership.** Sites may include one or more tax lots. Sites with two or fewer owners are necessary to reduce the cost and uncertainty of land assembly. Consistent with OAR 660-009-0005(2), Springfield considers parcel fragmentation as a development constraint that directly affects suitability as defined in OAR 660-009-0005(12).

³⁵ Miles, Mike E., Haney, Richard L., Bernes, Gayle, "Real Estate Development: Principles and Process," The Urban Land Institute, 1997.

- Attribute has "some meaningful connection with the operation of the industrial or employment use" - The cost of land assembly, in financial terms and in terms of extra time needed for site assembly, can make developing a commercial site with multiple land owners financially infeasible, resulting in the business choosing not to build on the site and possibly not locating in Springfield.
- Attribute is "typical of the industrial or employment use" - OAR 660-009-0005(11) specifically cites the "site configuration" as a site characteristic. Developing a commercial building on a site with more than two owners requires negotiating land assembly and purchase from multiple owners. Land assembly is difficult and often costly for a number of reasons. People own land for a variety of reasons, such as desire to develop the land, desire to keep the land undeveloped, desire to sell the land for a profit. Getting land owners to sell land can be difficult, especially if the ownership is legally disputed, such as in the case of inheritance cases. If a landowner is a willing seller, they may have an unrealistic expectation of their land's value, in the context of comparable land values. In addition, one parcel of land may have multiple owners, compounding the issues described above.

Developers attempting land assembly often have difficulty assembling a site at a cost that makes development economically viable. When assembling land, developers often find that owners of key sites are not willing sellers, have unrealistic expectations of the value of their land, or cannot get agreement among multiple owners to sell the land. As a result, developers of commercial buildings typically choose to develop sites with one or two owners.

The City of Springfield Economic Development Agency (SEDA) has provided and continues to provide public assistance to overcome parcelization constraints within the Glenwood and Downtown Urban Renewal Districts to facilitate redevelopment in Glenwood and Downtown. In addition to comprehensive planning and technical support to assist potential developer projects, SEDA assistance has included land purchase and purchase of options on future property sales. The City has limited resources for this type of activity and thus success with parcel assembly over the

past ten years has been mixed. The City does not have resources to facilitate parcel assembly throughout the City.

IMPLICATIONS

The analysis of presented in the economic opportunities analysis has implications for Springfield's economic land needs.

- *Economic growth.* Decision makers and community members that participated in the economic opportunities analysis agreed that economic growth is desirable over the planning period. The employment forecast indicates Springfield will add 13,440 new employees between 2010 and 2030 using the OAR 660-024-0040(8)(a)(ii) methodology. The economic opportunities analysis assumes that Springfield will have employment growth in a wide variety of businesses, from services and retail for residents to industrial development to medical services. The City wants to diversify its economy and attract higher wage and professional jobs.
- *Buildable lands.* Springfield has 3,414 acres that are designated for industrial and other employment use. About two-thirds of the land designated for employment within Springfield's UGB is considered developed and is not expected to redevelop over the 20 year planning period. Less than 15% of this land is buildable, unconstrained land. The majority of buildable, unconstrained employment land in Springfield has existing development on it that is expected to redevelop over the planning period. Springfield has a lack of buildable large sites, with one buildable site 20 acres and larger and 22 buildable sites in the five to 20 acre size range.
- *Redevelopment potential.*³⁶ The analysis of potentially redevelopable land and need for employment land assumes that Springfield will have substantial redevelopment over the planning period. The analysis of potentially redevelopable land assumes that the employment capacity of redeveloped areas will increase, not simply that a new building will replace an old building. Consistent with City Council policies, the areas that are expected to have the most redevelopment are in Glenwood, especially along the Willamette Riverfront and Franklin/McVay corridor, and in the Downtown Urban Renewal District.

³⁶ This study identifies land with redevelopment potential as land on which development has already occurred but on which, due to present or expected market forces, there exists the potential that existing development will be converted to more intensive uses (providing additional employment capacity) during the planning period.

The City will need to make strategic investments that support redevelopment and to continue supporting redevelopment through City plans and policies. For example, redevelopment in the City's targeted Downtown and Glenwood areas will require substantial investments in public infrastructure to provide public facilities and to overcome the existing impediments to development, including parcel assembly issues.

- *Employment that will not require vacant land.* Springfield assumed that 46% of employment would not require vacant employment land.³⁷ Springfield's assumptions about employment that will not require vacant land are as follows:

Employment that does not require vacant land

46% of all new employment (6,105 employees) will be accommodated on land that currently has improvements:

- 14% will locate on land designated for other uses (i.e., residential uses)
- 10% will locate in existing built space
- 22% will locate on "potentially redevelopable land"

Needed sites are based on the 54% of new employment (7,256) that will require vacant, suitable land.

- Fourteen percent of employment (1,918 employees) will locate in non-employment designations. These employees will include people with home occupations, working from home, and businesses that locate in residential or other non-employment designations. This assumption is based on the percent of employment located in non-employment designations in 2006. See Appendix C and Table C-12 for more information about this assumption.
- Ten percent of new employment (1,344 employees) will locate in existing built space. See Appendix C and Table C-12 for more information about this assumption.
- Twenty-one percent of new employment (2,921 employees) will locate on redevelopable sites. Table 5-1 shows that Springfield assumes 188 industrial sites and 342 commercial and mixed use sites³⁸ will redevelop over the planning period. The estimate of employment on these sites was based on the average number of employees per site by site size in 2006. See Chapter 2 for more information about redevelopment assumptions.

- *Need for large sites.* Springfield will be able to meet all employment land needs on sites five acres and smaller within the existing UGB, through redevelopment, infill development, and employment uses

³⁷ The estimate of 46% of new employment not requiring vacant land is based on the assumption that 1,918 employees will locate in non-employment designations, 1,344 employees will locate in existing built space, and 2,921 employees will locate on redevelopable sites. The total number of new employees not requiring new land is 6,183 employees, which is approximately 46% of the forecasted growth of 13,440 jobs.

³⁸ The analysis in Table 5-1 shows that 340 commercial and mixed-use sites are considered potentially redevelopable. Table 5-4 assumes that the need for two sites in the 2 to 5 acre size range will be accommodated through redevelopment. As a result, Springfield assumes demand for 342 commercial and mixed-use sites will be accommodated through redevelopment.

on non-employment land (e.g., home occupations). The employment land needs that may not be met within the UGB are for sites five acres and larger. The City has only one suitable site 20 acres or larger.

Availability of sites 20 acres and larger is important for attracting or growing large businesses, which are often traded-sector businesses. If the City does not have these large sites, there is little chance that the City will attract these types of businesses. While it may not be clear exactly what the business opportunities may be in ten to twenty years, it is clear that these businesses will not locate in Springfield if land is not available for development.

For example, in the past twenty years, most of the Gateway area developed. The area has a mix of uses including the International Way campus employment district, regional mall, apartments, offices, and more recently, the PeaceHealth RiverBend Medical Center Campus. Twenty-years ago it would have seemed highly unlikely that PeaceHealth would build their new regional facility in Springfield. If the City had not had desirable, serviceable land available, PeaceHealth would probably not have located their new facility in Springfield. Over the last 20 years, employment and commerce in the Gateway area has become a local and regional economic engine and major employment center. In 2006, the Gateway area had 33% of Springfield's employment (more than 9,800 employees) and 33% of payroll in the city, at \$325 million. By 2009, Gateway accounted for nearly 36% of the city's employment and \$368 million in payroll. In 2013, employment in the Gateway area accounted for 40% of employment in Springfield (more than 10,700 employees) and 43% of payroll in the city.³⁹

- *Redesignation of Smaller Sites.* Springfield's land deficit cannot be met through redesignating a surplus of small industrial- and commercial-designated sites, most of which are smaller than 2 acres. Map 2-3 shows that these sites are scattered throughout the City, generally along Main Street or in Mid- Springfield. There are few opportunities for assembly of a contiguous, unconstrained site with a configuration that makes it developable. These areas do not and are not expected to provide large sites for target employers that require large sites.

³⁹ Kim Thompson, Oregon Employment Department, "The Gateway Area & Growth in Springfield," presentation to Gateway Development Committee, October 24, 2014.

Even where small vacant sites are located adjacent to other small vacant sites, there are few places where a site larger than 5 acres could be assembled from small sites. There is probably no place where a 20-acre site could be assembled from small sites.

- *Site assembly.* Assembly of numerous small sites into 5 to 10 acre sites is difficult at best and often not feasible. Map 2-3 shows that of industrial- and commercial-designated sites are scattered throughout the City, generally along Main Street or in Mid-Springfield, and the majority of sites are smaller than 2 acres. Land assembly is difficult and often costly. Developers attempting land assembly often have difficulty assembling a site at a cost that makes development economically viable. When assembling land, developers often find that owners of key sites are not willing sellers, have unrealistic expectations of the value of their land, or cannot get agreement among multiple owners to sell the land. As a result, developers, especially developers of industrial buildings, typically choose to develop sites with one or two owners.
- *Need to expand the UGB to accommodate need for large sites.* Springfield's need for large sites cannot be met within the UGB. Meeting this need for large sites for large employers requires the City to expand its UGB into areas with suitable sites. These areas will have relatively large, flat sites with little parcelization and few owners, where businesses will have access to I-5 or a State highway.
- *Short-term land supply.* Based on the Goal 9 definition of short-term land supply and criteria for "engineering feasibility," the majority of inventoried commercial and industrial land supply within the Springfield UGB is part of the short-term land supply, assuming that funding is available to extend or increase capacity of infrastructure and urban services. The Goal 9 rule definition of short-term land supply does not account for land availability, such as whether the landowner is willing to sell it or the owner is willing to redevelop it. The Goal 9 rule definition of short-term land supply also does not account for needed site characteristics, such as site size. As a result, the City's short-term land supply as defined by Goal 9 may not be available and developers may have difficulty finding developable land with specific site characteristics.

National, State, County, and Local Trends

Appendix A

This appendix summarizes national, state, county, and local trends affecting Springfield. It presents a demographic and socioeconomic profile of Springfield (relative to Lane County and Oregon) and describes trends that will influence the potential for economic growth in Springfield. This appendix covers recent and current economic conditions in the City, and forecasts from the State Employment Department for employment growth in Lane County. This appendix meets the intent of OAR 660-009-0015(1).

NATIONAL, STATE, AND REGIONAL TRENDS

NATIONAL TRENDS

Economic development in Springfield over the next twenty years will occur in the context of long-run national trends. The most important of these trends include:

- **The aging of the baby boom generation, accompanied by increases in life expectancy.** The number of people age 65 and older will more than double by 2050, while the number of people under age 65 will grow only 22 percent. The economic effects of this demographic change include a slowing of the growth of the labor force, an increase in the demand for healthcare services, and an increase in the percent of the federal budget dedicated to Social Security and Medicare.⁴⁰

Baby boomers are expecting to work longer than previous generations. An increasing proportion of people in their early to mid-50s expect to work full-time after age 65. In 2004, about 40% of these workers expect to work full-time after age 65, compared with about 30% in 1992.⁴¹ This trend can be seen in Oregon, where the share of workers 65 years and older grew from 2% of the workforce

⁴⁰ The Board of Trustees, Federal Old-Age and Survivors Insurance and Federal Disability Insurance Trust Funds, 2008, *The 2008 Annual Report of the Board of Trustees of the Federal Old-Age and Survivors Insurance and Federal Disability Insurance Trust Funds*, April 10, 2008.

⁴¹ "The Health and Retirement Study," 2007, National Institute of Aging, National Institutes of Health, U.S. Department of Health and Human Services.

in 1992 to 3% of the workforce in 2002, an increase of 64%. Over the same ten-year period, workers 45 to 64 years increased by 70%.⁴²

- **Tightening labor force.** Growth in the labor force is projected to slow over the 2006-2016 period as a result of: (1) aging and retirement of the baby boomer generation and (2) the labor force participation by women has peaked. Job growth is expected to outpace population growth, with a 10% increase in employment (15.6 million jobs) compared to a 9% increase in civilian noninstitutional population 16 years and older (22 million people).⁴³
- **Need for replacement workers.** The need for workers to replace retiring baby boomers will outpace job growth. According to the Bureau of Labor Statistics, net replacement needs will be 33.4 million job openings over the 2006-2016 period, more than twice the growth in employment of 15.6 million jobs. Management occupations and teachers will have the greatest need for replacement workers because these occupations have older-than-average workforce.⁴⁴
- **Increases in labor productivity.** Productivity, as measured by output per hour, increased over the 1995 to 2005 period. The largest increases in productivity occurred over the 1995 to 2000 period, led by industries that produced, sold, or intensively used information technology products. Productivity increased over the 2000 to 2005 period but at a slower rate than during the latter half of the 1990's. The sectors that experienced the largest productivity increases over the 2000 to 2005 period were: Information, Manufacturing, Retail Trade, and Wholesale Trade. Productivity in mining decreased over the five-year period.⁴⁵
- **Continued trend towards domestic outsourcing.** Businesses continue to outsource work to less expensive markets. Outsourcing generally falls into two categories: (1) moving jobs from relatively expensive areas to less expensive areas within the U.S. and (2) moving jobs outside of the U.S. to countries with lower labor costs.

⁴² "Growing Numbers of Older Workers in Oregon," Oregon Employment Department.

⁴³ Arlene Dohm and Lyn Shnipper, "Occupational Employment Projections to 2016," *Monthly Labor Review*, November 2007, pp. 86-125.

⁴⁴ Arlene Dohm and Lyn Shnipper, "Occupational Employment Projections to 2016," *Monthly Labor Review*, November 2007, pp. 86-125.

⁴⁵ Corey Holman, Bobbie Joyeaux, and Christopher Kask, "Labor Productivity trends since 2000, by sector and industry," Bureau of Labor Statistics *Monthly Labor Review*, February 2008.

About three-quarters of layoffs in the U.S. between 1995 and 2004 were the result of domestic relocation, involving movement of work within the same company. The industries with the largest amounts of domestic outsourcing were: manufacturing, retail trade, and information.⁴⁶

- **Continued growth in global trade and the globalization of business activity.** With increased global trade, both exports and imports rise. Faced with increasing domestic and international competition, firms will seek to reduce costs through implementing quality- and productivity-enhancing technologies, such as robotics or factor automation. In addition, some production processes will be outsourced offshore.⁴⁷
- **Continued shift of employment from manufacturing and resource-intensive industries to the service-oriented sectors of the economy.** Increased worker productivity and the international outsourcing of routine tasks lead to declines in employment in the major goods-producing industries. Projections from the Bureau of Labor Statistics indicate that U.S. employment growth will continue to be strongest in healthcare and social assistance, professional and business services, and other service industries. Construction employment will also grow but manufacturing employment will decline.⁴⁸
- **The importance of high-quality natural resources.** The relationship between natural resources and local economies has changed as the economy has shifted away from resource extraction. Increases in the population and in households' incomes, plus changes in tastes and preferences, have dramatically increased demands for outdoor recreation, scenic vistas, clean water, and other resource-related amenities. Such amenities contribute to a region's quality of life and play an important role in attracting both households and firms.⁴⁹

⁴⁶ Sharon P. Brown and Lewis B. Siegel, "Mass Layoff Data Indicate Outsourcing and Offshoring Work," *Monthly Labor Review*, August 2005, pp. 3-10.

⁴⁷ Eric B. Figueroa and Rose A. Woods, 2007, "Industry Output and Employment Projections to 2016," *Monthly Labor Review*, November 2007, pp. 53-85.

⁴⁸ Eric B. Figueroa and Rose A. Woods, 2007, "Industry Output and Employment Projections to 2016," *Monthly Labor Review*, November 2007, pp. 53-85.; Arlene Dohm and Lyn Shniper, "Occupational Employment Projections to 2016," *Monthly Labor Review*, November 2007, pp. 86-125.

⁴⁹ For a more thorough discussion of relevant research, see, for example, Power, T.M. and R.N. Barrett. 2001. *Post-Cowboy Economics: Pay and Prosperity in the New American West*. Island Press, and Kim, K.-K., D.W. Marcouiller, and S.C. Deller. 2005.

- **Continued westward and southward migration of the U.S. population.** Although there are some exceptions at the state level, a 2006 U.S. Census report documents an ongoing pattern of interstate population movement from the Northeast and Midwest to the South and West.⁵⁰
- **The growing importance of education as a determinant of wages and household income.** According to the Bureau of Labor Statistics, a majority of the fastest growing occupations will require an academic degree, and on average they will yield higher incomes than occupations that do not require an academic degree. The fastest growing of occupations requiring an academic degree will be: computer software application engineers, elementary school teachers, and accountants and auditors. Occupations that do not require an academic degree (e.g., retail sales person, food preparation workers, and home care aides) will grow, accounting for about half of all jobs by 2016. These occupations typically have lower pay than occupations requiring an academic degree.⁵¹

The national median income in 2006 was about \$32,000. Workers without a high school diploma earned \$13,000 less than the median income and workers with a high school diploma earned \$6,000 less than median income. Workers with some college earned slightly less than median and workers with a bachelor's degree earned \$13,000 more than median. Workers in Oregon experience the same patterns as the nation but pay is generally lower in Oregon than the national average.⁵²

- **Continued increase in demand for energy.** Energy prices are forecast to remain at relatively high levels, as seen in the 2006 to 2008 period, possibly increasing further over the planning period. Output from the most energy-intensive industries is expected to decline, but growth in the population and in the economy is expected to increase the total amount of energy demanded. Energy sources are expected to diversify and the energy efficiency of

"Natural Amenities and Rural Development: Understanding Spatial and Distributional Attributes." *Growth and Change* 36 (2): 273-297.

⁵⁰ Marc J. Perry, 2006, *Domestic Net Migration in the United States: 2000 to 2004*, Washington, DC, Current Population Reports, P25-1135, U.S. Census Bureau.

⁵¹ Arlene Dohm and Lyn Shniper, "Occupational Employment Projections to 2016," *Monthly Labor Review*, November 2007, pp. 86-125.

⁵² "Growing Number of Older Workers in Oregon," Oregon Employment Department and American Community Survey, U.S. Census, 2006.

automobiles, appliances, and production processes are projected to increase. Despite increases in energy efficiency and decreases in demand for energy by some industries, demand for energy is expected to increase over the 2008 to 2030 period because of increases in population and economic activity.⁵³

- **Impact of rising energy prices on commuting patterns.** Energy prices may continue to be high (relative to historic energy prices) or continue to rise over the planning period.⁵⁴ The increases in energy prices may impact willingness to commute long distances. There is some indication that increases in fuel prices have resulted in decreased suburban housing price (i.e., housing demand), especially in large urban areas (e.g., Los Angeles or Chicago) and suburbs far from the center city. If this pattern continues, the area in Oregon most likely to be most impacted is Portland, which has the largest area of urban and suburban development in the state.⁵⁵
- **Possible effect of rising transportation and fuel prices on globalization.** Increases in globalization are related to the cost of transportation: When transportation is less expensive, companies move production to areas with lower labor costs. Oregon has benefited from this trend, with domestic outsourcing of call centers and other back office functions. In other cases, businesses in Oregon (and the nation) have “off-shored” employment to other countries, most frequently manufacturing jobs.

Increases in either transportation or labor costs may impact globalization. When the wage gap between two areas is larger than the additional costs of transporting goods, companies are likely to shift operations to an area with lower labor costs. Conversely, when transportation costs increase, companies may have incentive to relocate to be closer to suppliers or consumers.

This effect occurs incrementally over time and it is difficult to measure the impact in the short-term. If fuel prices and transportation costs decrease over the planning period, businesses may not make the decision to relocate (based on transportation

⁵³ Energy Information Administration, 2008, *Annual Energy Outlook 2008 with Projections to 2030*, U.S. Department of Energy, DOE/EIA-0383(2008), April.

⁵⁴ Energy Information Administration, 2008, *Annual Energy Outlook 2008 with Projections to 2030*, U.S. Department of Energy, DOE/EIA-0383(2008), April.

⁵⁵ Cortright, Joe. “Driven to the Brink: How the Gas Price Spike Popped the Housing Bubble and devalued the Suburbs,” May 2008.

costs) because the benefits of being closer to suppliers and markets may not exceed the costs of relocation.

- **Growing opportunities for “green” businesses.** Businesses are increasingly concerned with “green” business opportunities and practices. These business practices are concerned with “the design, commercialization, and use of processes and products that are feasible and economical while reducing the generation of pollution at the source and minimizing the risk to human health and the environment.”⁵⁶

Green business opportunities have historically been at the mercy of feasibility and economics; if a firm ignores feasibility and economics while trying to be green, the firm may not be able to afford to operate long enough to learn how to make green businesses feasible. The three types of green business opportunities are products, processes, and education.

- *Producing green products.* Green products perform the function of regular products, but do it in a way that uses fewer resources or creates less pollution. For example, hybrid vehicles are green because they use less gasoline to operate and add fewer pollutants to the air. Yet hybrid vehicles serve the same function as non-hybrid cars. Another example is bamboo fencing and lumber, which is green because bamboo is more renewable than traditional lumber. Bamboo products have the strength necessary for building.
- *Providing education about green practices or products.* Green education is often closely related to producing green products and is often done by consultants or nonprofits. Examples of companies involved in green education include the U.S. Green Building Council, which certifies buildings as green (LEED certification), or a consulting firm that writes a green (or sustainable) plan for a city or business.
- *Using green business practices.* Green business practices are alternative methods of doing business that promote resource conservation, prevent or reduce pollution, or have other beneficial environmental effects. Examples of green business processes include: buying products locally to reduce shipping distance, recycling waste products (where

⁵⁶ Urban Green Partnership at urbangreenpartnership.org

possible), or maximizing the use of natural lighting to reduce use of electricity and light bulbs.

For example, ECONorthwest is a green educator because we help our clients manage natural resources effectively and take all costs and benefits of a particular action into account in order to properly judge the correct course of action. A frequent method of marketing green products involves green education. It is much easier to sell a hybrid car to a customer who knows the environmental benefits of owning a hybrid, so educating potential customers can aid greatly in increasing sales.

- **Potential impacts of global climate change.** There is growing support for but not a consensus about whether global climate change is occurring as a result of greenhouse gas emissions. There is a lot of uncertainty surrounding global climate change, including the pace of climate change and the ecological and economic impacts of climate changes. Climate change may result in the following changes in the Pacific Northwest: (1) increase in average temperatures, (2) shift in the type of precipitation, with more winter precipitation falling as rain, (3) decrease in mountain snowpack and earlier spring thaw and (4) increases in carbon dioxide in the air.⁵⁷ Assuming that global climate change is occurring and will continue to occur over the next 20-years, a few broad, potential economic impacts for the nation and Pacific Northwest include:⁵⁸
 - *Potential impact on agriculture and forestry.* Climate change may impact Oregon's agriculture through changes in: growing season, temperature ranges, and water availability.⁵⁹ Climate change may impact Oregon's forestry through increase in wildfires, decrease in the rate of tree growth, change in mix of tree species, and increases in disease and pests that damage trees.⁶⁰

⁵⁷ "Economic Impacts of Climate Change on Forest Resources in Oregon: A Preliminary Analysis," Climate Leadership Initiative, Institute for Sustainable Environment, University of Oregon, May 2007.

⁵⁸ The issue of global climate change is complex and there is a substantial amount of uncertainty about climate change. This discussion is not intended to describe all potential impacts of climate change but to present a few ways that climate change may impact the economy of cities in Oregon and the Pacific Northwest.

⁵⁹ "The Economic Impacts of Climate Change in Oregon: A preliminary Assessment," Climate Leadership Initiative, Institute for Sustainable Environment, University of Oregon, October 2005.

⁶⁰ "Economic Impacts of Climate Change on Forest Resources in Oregon: A Preliminary Analysis," Climate Leadership Initiative, Institute for Sustainable Environment, University of Oregon, May 2007.

- Potential impact on tourism and recreation. Impacts on tourism and recreation may range from: (1) decreases in snow-based recreation if snow-pack in the Cascades decreases, (2) negative impacts to tourism along the Oregon Coast as a result of damage and beach erosion from rising sea levels,⁶¹ (3) negative impacts on availability of water summer river recreation (e.g., river rafting or sports fishing) as a result of lower summer river flows, and (4) negative impacts on the availability of water for domestic and business uses.
- *Potential changes in government policies.* There is currently no substantial national public policy response to global climate change. States and regional associations of states are in the process of formulating policy responses to address climate change including: increasing renewable energy generation, selling agricultural carbon sequestration credits, and encouraging energy efficiency.⁶² Without clear indications of the government policies that may be adopted, it is not possible to assess the impact of government policies on the economy.

Global climate change may offer economic opportunities. The search for alternative energy sources may result in increased investment and employment in “green” energy sources, such as wind, solar, and biofuels. Firms in the Northwest are well positioned to lead efforts on climate change mitigation, which may result in export products, such as renewable technologies or green manufacturing.⁶³

Short-term national trends will also affect economic growth in the region, but these trends are difficult to predict. At times these trends may run counter to the long-term trends described above. A recent example is the downturn in economic activity in 2007 following declines in the housing market and the mortgage banking crisis. The result of the economic downturn has been a decrease in employment related to the housing market, such as construction and real estate. Employment in these industries will recover as the housing market recovers and will continue

⁶¹ “The Economic Impacts of Climate Change in Oregon: A preliminary Assessment,” Climate Leadership Initiative, Institute for Sustainable Environment, University of Oregon, October 2005.

⁶² Pew Center on Global Climate Change website: http://www.pewclimate.org/what_s_being_done/in_the_states/

⁶³ “The Economic Impacts of Climate Change in Oregon: A preliminary Assessment,” Climate Leadership Initiative, Institute for Sustainable Environment, University of Oregon, October 2005.

to play a significant role in the national, state, and local economy over the long run. This report takes a long-run perspective on economic conditions (as the Goal 9 requirements intend) and does not attempt to predict the impacts of short-run national business cycles on employment or economic activity.

STATE TRENDS

State and regional trends will also affect economic development in Springfield over the next twenty years. The most important of these trends includes: continued in-migration from other states, distribution of population and employment across the State,

- **Continued in-migration from other states.** Oregon will continue to experience in-migration from other states, especially California and Washington. According to a U.S. Census study, Oregon had net interstate in-migration (more people moved *to* Oregon than moved *from* Oregon) during the period 1990-2004.⁶⁴ Oregon had an annual average of 26,290 more in-migrants than out-migrants during the period 1990-2000. The annual average dropped to 12,880 during the period 2000-2004.⁶⁵ Most in-migrants come from California, Washington, and other western states.⁶⁶
- **Concentration of population and employment in the Willamette Valley.** Nearly 70% of Oregon's population lives in the Willamette Valley. About 10% of Oregon's population lives in Southern Oregon and 9% lives in Central Oregon. The Oregon Office of Economic Analysis (OEA) forecasts that population will continue to be concentrated in the Willamette Valley through 2040, increasing slightly to 71% of Oregon's population.

Employment growth generally follows the same trend as population growth. Employment growth varies between regions even more, however, as employment reacts more quickly to changing economic conditions. Total employment increased in each

⁶⁴ Marc J. Perry, 2006, *Domestic Net Migration in the United States: 2000 to 2004*, Washington, DC, Current Population Reports, P25-1135, U.S. Census Bureau.

⁶⁵ In contrast, California had net interstate *out-migration* over the same period. During 1990-2000, California had an annual average of 220,871 more out-migrants than in-migrants. The net outmigration slowed to 99,039 per year during 2000-2004.

⁶⁶ Oregon Department of Motor Vehicles collects data about state-of-origin for drivers licenses surrendered by people applying for an Oregon drivers license from out-of-state. Between 2000 and 2007, about one-third of licenses surrendered were from California, 15% to 18% were surrendered from Washington, and about 17% to 19% were from the following states: Arizona, Idaho, Nevada, Colorado, and Texas.

of the state's regions over the period 1970-2006 but over 70% of Oregon's employment was located in the Willamette Valley.

- **Change in the type of the industries in Oregon.** As Oregon has transitioned away from natural resource-based industries, the composition of Oregon's employment has shifted from natural resource based manufacturing and other industries to service industries. The share of Oregon's total employment in Service industries increased from its 1970s average of 19% to 30% in 2000, while employment in Manufacturing declined from an average of 18% in the 1970s to an average of 10% in 2005.
- **Shift in manufacturing from natural resource-based to high-tech and other manufacturing industries.** Since 1970, Oregon started to transition away from reliance on traditional resource-extraction industries. A significant indicator of this transition is the shift within Oregon's manufacturing sector, with a decline in the level of employment in the Lumber & Wood Products industry and concurrent growth of employment in other manufacturing industries, such as high-technology manufacturing (Industrial Machinery, Electronic Equipment, and Instruments), Transportation Equipment manufacturing, and Printing and Publishing.⁶⁷
- **Continued importance of manufacturing to Oregon's economy.** Revenue from exports totaled \$16.5 million in 2007, an increase of \$5.1 million or 45% since 2000. Four of the five industries that accounted for more than three-quarters of revenue from exports in 2007 (\$12.6 million) were manufacturing industries: Computers and Electronic Production (\$6.3 million); Crop Production (\$2.2 million); Transportation Equipment (\$1.7 million); Machinery Manufacturers (\$1.7 million); and Chemical Manufacturers (\$0.7 million). Manufacturing employment is concentrated in five counties in the Willamette Valley or Portland area: Washington, Multnomah, Lane, Clackamas, and Marion Counties. Average wages for employees of manufacturing firms in these counties in 2006 ranged from \$71,500 to \$34,200 and were generally above the state's average (about \$38,000)⁶⁸

⁶⁷ Although Oregon's economy has diversified since the 1970's, natural resource-based manufacturing accounts for more than one-third of employment in manufacturing in Oregon in 2006, with the most employment in Wood Product and Food manufacturing.

⁶⁸ OECD, "Economic Data Packet, March 2008."

- **Small businesses continue to account for over 50% of employment in Oregon.** Small business, with 100 or fewer employees, account for 51% of private sector employment in Oregon, up from about 50.2% of private employment in 2000 and down from 52.5% in 1996. Workers of small businesses typically had lower wages than the state average, with average wages of \$33,130 compared to the statewide average of about \$38,000 in 2006.
- **Continued lack of diversity in the State Economy.** While the transition from Lumber and Wood Products manufacturing to high-tech manufacturing has increased the diversity of employment within Oregon, it has not significantly improved Oregon's diversity relative to the national economy. Oregon's relative diversity has historically ranked low among states. Oregon ranked 35th in diversity (1st = most diversified) based on Gross State Product data for 1963–1986, and 32nd based on data for the 1977–1996 period.⁶⁹ A recent analysis, based on 2006 data, ranked Oregon 31st.⁷⁰ These rankings suggest that Oregon is still heavily dependent on a limited number of industries. Relatively low economic diversity increases the risk of economic volatility as measured by changes in output or employment.

The changing composition of employment has not affected all regions of Oregon evenly. Growth in high-tech and Services employment has been concentrated in urban areas of the Willamette Valley and Southern Oregon, particularly in Washington, Benton, and Josephine Counties. The brunt of the decline in Lumber & Wood Products employment was felt in rural Oregon, where these jobs represented a larger share of total employment and an even larger share of high-paying jobs than in urban areas.

⁶⁹ LeBre, Jon. 1999. "Diversification and the Oregon Economy: An Update." *Oregon Labor Trends*. February.

⁷⁰ CFED, 2007, The Development Report Card for the States, <http://www.cfed.org>.

ECONOMIC TRENDS IN LANE COUNTY AND SPRINGFIELD

Future economic growth in Springfield will be affected in part by demographic and economic trends in the city and surrounding region. A review of historical demographic and economic trends provides a context for establishing a reasonable expectation of future growth in Springfield. In addition, the relationship between demographic and economic indicators such as population and employment can help assess the local influence of future trends and resulting economic conditions. This section addresses the following trends in Springfield:

- Population and demographics
- Household and personal income
- Employment
- Business activity
- Outlook for growth in Springfield

POPULATION AND DEMOGRAPHIC CHARACTERISTICS

Population growth in Oregon tends to follow economic cycles. Historically, Oregon's economy is more cyclical than the nation's, growing faster than the national economy during expansions, and contracting more rapidly than the nation during recessions. Oregon grew more rapidly than the U.S. in the 1990s (which was generally an expansionary period) but lagged behind the U.S. in the 1980s. Oregon's slow growth in the 1980s was primarily due to the nationwide recession early in the decade. As the nation's economic growth has slowed during 2007, Oregon's population growth began to slow.

Oregon's population grew from 2.8 million people in 1990 to 3.7 million people in 2007, an increase of more than 900,000 people at an average annual rate of 1.6%. Oregon's growth rate slowed to 1.3% annual growth between 2000 and 2007.

Lane County grew slower than the State average between 1990 and 2007, growing at 1.1% annually and adding more than 60,000 people. More than 60% of the County's population lived in the Eugene-Springfield area in 2007, with about 17% of the County's population in Springfield. Springfield's population grew faster than the County average, at 1.5% annually, adding 12,637 residents over the seventeen-year period.

Table A-1. Population in the U.S., Oregon, the Willamette Valley, Lane County, Springfield, and Eugene, 1990-2007

Area	Population			Change 1990 to 2007		
	1990	2000	2007	Number	Percent	AAGR
U.S.	248,709,873	281,421,906	301,621,157	52,911,284	21%	1.1%
Oregon	2,842,321	3,421,399	3,745,455	903,134	32%	1.6%
Willamette Valley	1,962,816	2,380,606	2,602,790	639,974	33%	1.7%
Lane County	282,912	322,959	343,140	60,228	21%	1.1%
Springfield	44,683	52,864	57,320	12,637	28%	1.5%
Eugene	112,669	137,893	153,690	41,021	36%	1.8%

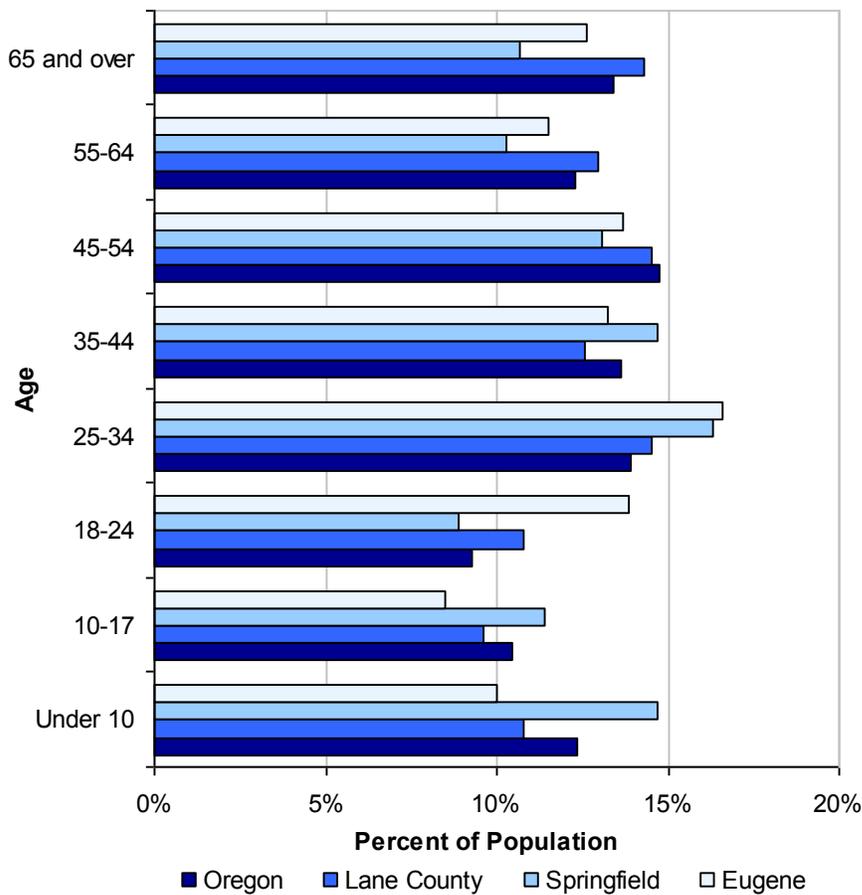
Source: U.S. Census, the Population Research Center at Portland State University.

Notes: Benton, Clackamas, Lane, Linn, Marion, Multnomah, Polk, Washington, and Yamhill Counties represent the Willamette Valley Region.

Migration is the largest component of population growth in Oregon. Between 1990 and 2007, in-migration accounted for 70% of Oregon's population growth. Over the same period, in-migration accounted for 74% of population growth in Lane County, adding nearly 44,500 residents over the seventeen-year period.

Springfield's population was younger than the County or State averages in 2008. Figure A-1 shows the age structure for Oregon, Lane County, Eugene, and Springfield in 2008. Springfield had a greater proportion of its population under 44 years of age (66%) than Eugene (62%), Lane County (58%), or Oregon (60%). Springfield also had a smaller share of population aged 55 and older, 21% of Springfield's population, compared to 24% in Eugene, 27% in the County, 26% in the State.

Figure A-1. Population by age, Oregon, Lane County, Eugene, and Springfield, 2008



Source: Claritas 2008, percentages calculated by ECONorthwest.

The average age of Springfield residents is increasing. According to the US Census, Springfield’s average age was 32 in 2000, 30 in 1990, and 26 in 1980. Table A-2 shows the change in age distribution for Springfield between 2000 and 2008. The age group that increased the most was people aged 45 to 64, which grew by 2,540 people (24%). This age group’s proportion of the total population increased from 20% to 23% during this time period. The largest percentage decrease was in people aged 18 to 24, which shrunk by 913 people (16%).

Table A-2. Change in age distribution, Springfield, 2000-2008

Age Group	2000		2008		Change 2000 to 2008		
	Number	Percent	Number	Percent	Number	Percent	Share
Under 5	4,327	8%	4,121	7%	-206	-5%	-0.8%
5-17	10,069	19%	10,477	19%	408	4%	-0.3%
18-24	5,890	11%	4,977	9%	-913	-16%	-2.3%
25-44	16,609	31%	17,372	31%	763	5%	-0.4%
45-64	10,546	20%	13,086	23%	2,540	24%	3.4%
65 and over	5,423	10%	5,983	11%	560	10%	0.4%
Total	52,864	100%	56,016	100%	3,152	6%	0.0%

Source: U.S. Census 2000 and Claritas 2008

Note: Percent change over the 2000 to 2008 period is based on the growth in the age group divided by the number of people in the age group in 2000. For example, people 5 to 17 years old had a 4% percent change, which was calculated using the following calculation: $408/10,069 = 4\%$.

Note: Share refers to the change in the percent of an age group between 2000 and 2008. For example, the share of people 18 to 24 years old decreased from 11% to 9%, a decrease of 2.3%.

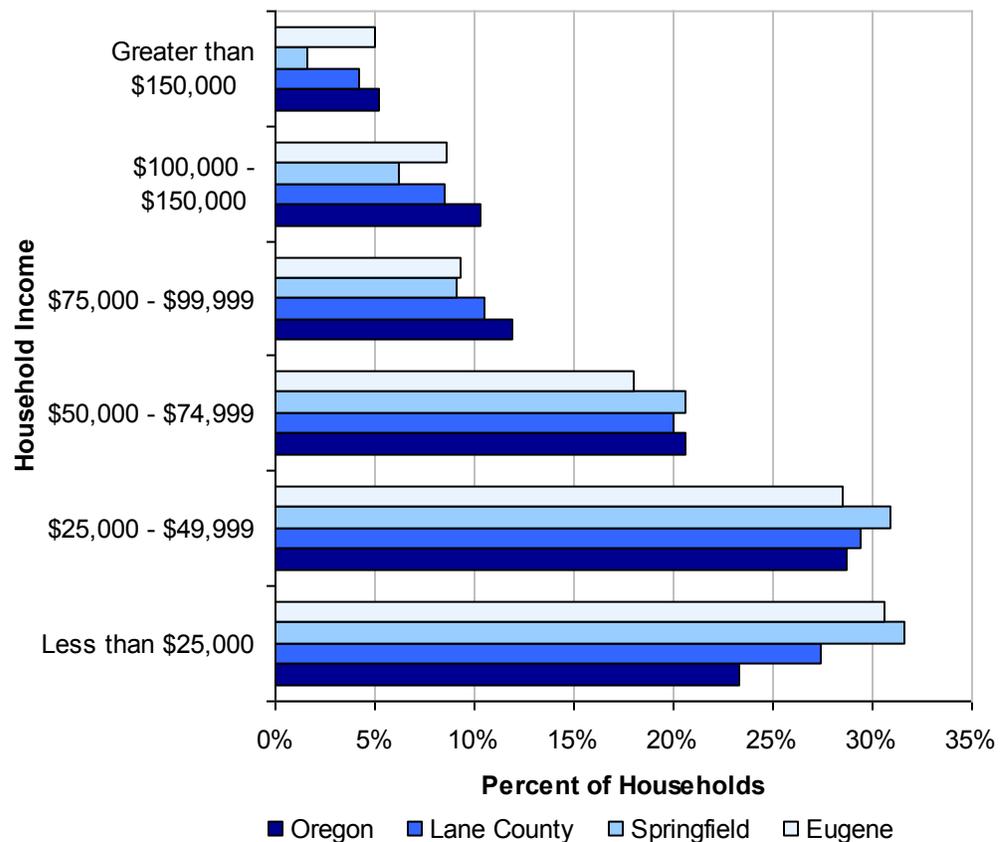
Note: Percentages may not add to 100% as a result of rounding errors.

HOUSEHOLD AND PERSONAL INCOME

Income in Lane County and Springfield has historically been lower than the State or national averages. Lane County's median household income in 2006 was \$42,127, compared with \$46,230 for Oregon and the national average of \$48,451. The median household income in Springfield in 1999 was \$33,031, 89% of the County average of \$36,942.

Lane County's median household income in 2006 was \$42,127, compared with \$46,230 for Oregon and the national average of \$48,451. Figure A-2 shows the distribution of household income in Oregon, Lane County, Eugene, and Springfield in 2008. Figure A-2 shows that a larger share of households in Springfield (32%) had an income of \$25,000 or less, compared to Lane County (27%) or the State (23%). Springfield also has a lower share of households with income above \$75,000 (17%) than Eugene (23%), the County (23%), or the State (27%).

Figure A-2. Distribution of household income of Oregon, Lane County, Eugene, and Springfield, 2008

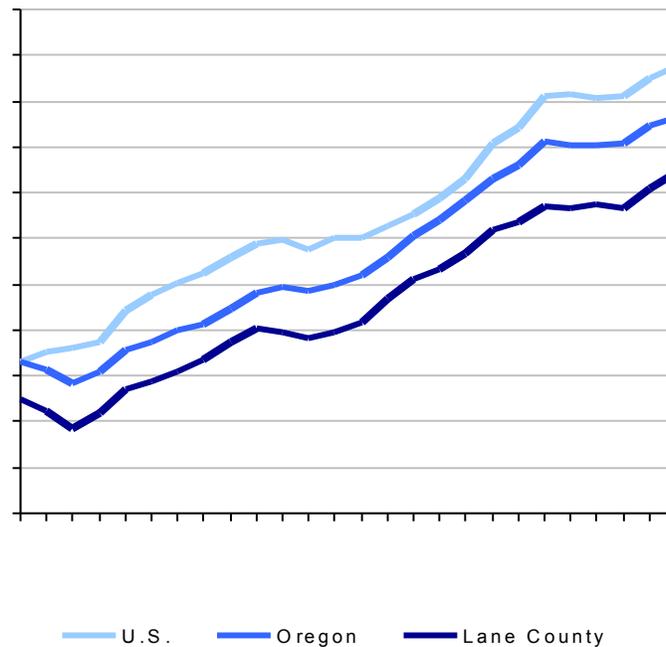


Source: Claritas 2008

Figure A-3 shows the change in per capita personal income for the U.S., Oregon, and Lane County between 1980 and 2005 (in constant 2005 dollars). Oregon’s per capita personal income was consistently lower than the U.S. average over the 25-year period. While the gap between the Oregon and U.S. average narrowed in the mid-1990s, it widened again starting in the late 1990’s.

Lane County’s personal income over the 25-year period was consistently lower than Oregon’s personal income. In 2005, per capita personal income in Lane County was approximately 92% of Oregon’s per capital income and 87% of the U.S. per capital income. During the 25-year period, per capita personal income in both Lane County and Oregon grew by 49%, while personal income grew by 59% nationally during the same period.

Figure A-3. Per capita personal income in the U.S., Oregon, and Lane County, 1980-2005, (\$2005)

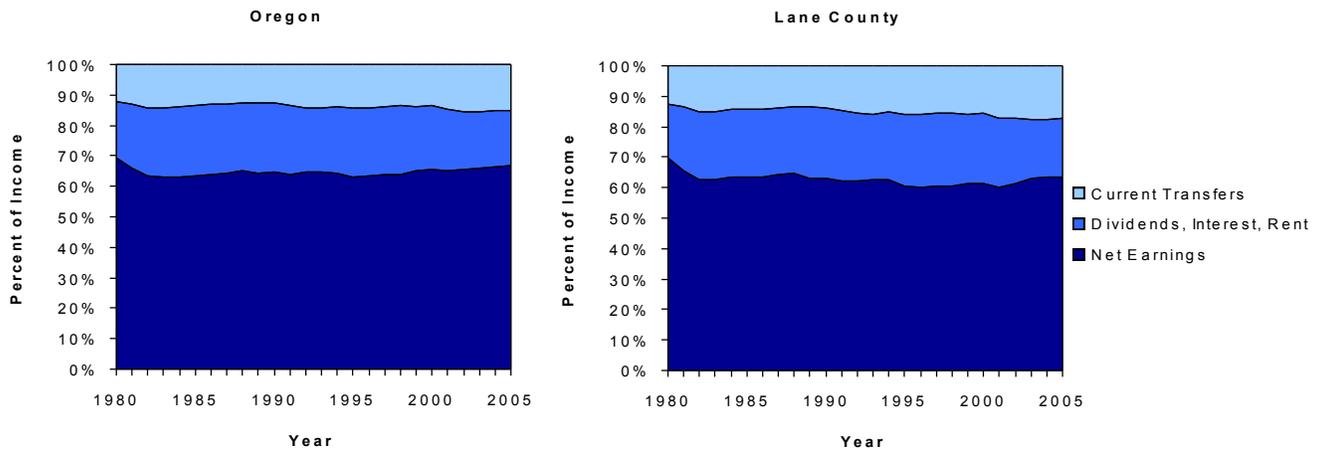


Source: Regional Economic Information System, Bureau of Economic Analysis, U.S. Department of Commerce

Figure A-4 shows the major sources of per capita personal income for Oregon and Lane County between 1980 and 2005. Lane County's share of personal income from net earnings was lower than for Oregon and the County's share of personal income from transfer payments and dividends, interest, and rent was higher than the State average.

Retirees are most likely to have personal income from current transfers and dividends, interest, and rent. The larger share of personal income from these sources makes sense because Lane County has a larger share of people over 60-years than the State average. Figure A-1 shows that Lane County has a higher percentage of residents over 60 years old than the State average. In addition, the share of population aged 65 and older increased by 16% between 1990 and 2000 in Lane County, compared with a 12% statewide increase in population 65 and older.

Figure A-4. Per capita personal income by major sources, Oregon and Lane County, 1980-2005



Source: Regional Economic Information System, Bureau of Economic Analysis, U.S. Department of Commerce

Table A-3 shows average annual pay per employee in the U.S., Oregon, and Lane County for 2000 to 2006. The national average wage grew faster than State or County averages. The average U.S. wage increased by 20% (more than \$7,000), compared to the State increase of 16% (more than \$5,000) or the County increase of 19% (more than \$5,000). Wages in Lane County relative to the U.S. decreased by 1% over the six-year period.

Lane County's average annual wage has increased by 19% (more than \$5,000) from \$27,878 to \$33,240 over the 2000 to 2006 period. Lane County's average pay has grown faster than the State average, increasing from 85% of the State average in 2000 to 87% in 2006.

Table A-3. Average annual pay, Oregon and Lane County (nominal dollars), 2000-2006

	U.S	Oregon	Lane County	Lane County	
				% of U.S.	% of State
2000	\$35,323	\$32,776	\$27,878	79%	85%
2001	\$36,219	\$33,202	\$28,982	80%	87%
2002	\$36,764	\$33,685	\$29,427	80%	87%
2003	\$37,765	\$34,455	\$30,325	80%	88%
2004	\$39,354	\$35,627	\$31,339	80%	88%
2005	\$40,677	\$36,593	\$32,302	79%	88%
2006	\$42,535	\$38,070	\$33,240	78%	87%
Change 2000 to 2006					
Nominal Change	\$7,212	\$5,294	\$5,362		
Percent Change	20%	16%	19%		

Source: Oregon Employment Department and U.S. Bureau of Labor Statistics

Springfield's average wages are similar to the County average. The average wage for workers in Springfield in 2006 was nearly \$33,000.

LANE COUNTY EMPLOYMENT TRENDS

Tables A-4 and A-5 present data from the Oregon Employment Department that show changes in covered employment⁷¹ for Lane County between 1980 and 2005. The changes in sectors and industries are shown in two tables: (1) between 1980 and 2000 and (2) between 2001 and 2005. The analysis is divided in this way because of changes in industry and sector classification that made it difficult to compare information about employment collected after 2001 with information collected prior to 2000.

Employment data in this section is summarized by *sector*, each of which includes several individual *industries*. For example, the Retail Trade sector includes General Merchandise Stores, Motor Vehicle and Parts Dealers, Food and Beverage Stores, and other retail industries.

Table A-4 shows the changes in covered employment by sector in Lane County between 1980 and 2000. Covered employment in the County grew from 97,600 to 139,696, an increase of 43% or 42,096 jobs. Every sector added jobs during this period, except for Mining. The sectors with the greatest change in employment were Services and Retail Trade, adding a total of 29,423 jobs or about 70% of all new jobs.

Manufacturing grew by 4,020 jobs during the twenty-year period. The industries with the largest manufacturing growth were Transportation equipment manufacturing (R.V. manufacturing), computer and electronics manufacturing, and machinery manufacturing.

Average pay per employee increased from about \$13,700 in 1980 to \$27,900 in 2000. The sectors that grew the fastest generally paid less than average, with Services paying between 80% to 90% of average and Retail Trade paying about 60% of average. Manufacturing jobs generally paid more than the average, varying between 140% of average in 1980 to 124% of average by 2000.

⁷¹ Covered employment refers to jobs covered by unemployment insurance, which includes most wage and salary jobs but does not include sole proprietors, seasonal farm workers, and other classes of employees.

Table A-4. Covered employment in Lane County, 1980-2000

Sector	1980	1990	2000	Change 1980 to 2000		
				Difference	Percent	AAGR
Agriculture, Forestry & Fishing	1,137	1,863	2,101	964	85%	2.5%
Mining	231	179	154	-77	-33%	-1.6%
Construction	4,600	3,992	6,834	2,234	49%	1.6%
Manufacturing	19,638	20,654	23,658	4,020	20%	0.7%
Trans., Comm., & Utilities	3,836	3,750	3,845	9	0%	0.0%
Wholesale Trade	5,578	5,900	6,422	844	15%	0.6%
Retail Trade	20,299	24,429	28,758	8,459	42%	1.4%
Finance, Insurance & Real Estate	4,217	4,523	6,198	1,981	47%	1.6%
Services	18,272	27,817	39,236	20,964	115%	3.1%
Nonclassifiable/all others	13	50	37	24	185%	4.3%
Government	19,779	20,219	22,453	2,674	14%	0.5%
Total	97,600	113,376	139,696	42,096	43%	1.4%

Source: Oregon Employment Department, Oregon Labor Market Information System, Covered Employment & Wages. Summary by industry and percentages calculated by ECONorthwest

Note: AAGR is average annual growth rate

Table A-5 shows the change in covered employment by sector for Lane County between 2001 and 2007. Employment increased by 13,549 jobs or 10% during this period. The private sectors with the largest increases in numbers of employees were Administration Support and Cleaning, Retail Trade, Construction, and Health and Social Assistance. The sector that lost the greatest number of employees during this period was Agriculture, Forestry, Fishing and Mining.

Table A-5. Covered employment in Lane County, 2001-2007

Sector	2001	2007	Change 2001 to 2007		
			Difference	Percent	AAGR
Natural Resources and Mining	2,338	2,062	-276	-12%	-2.1%
Construction	6,366	8,034	1,668	26%	4.0%
Manufacturing	19,697	19,864	167	1%	0.1%
Wholesale	5,300	6,071	771	15%	2.3%
Retail	17,912	19,755	1,843	10%	1.6%
Transportation & Warehousing	2,606	3,047	441	17%	2.6%
Information	3,729	3,901	172	5%	0.8%
Finance & Insurance	3,963	4,313	350	9%	1.4%
Real Estate Rental & Leasing	2,508	2,530	22	1%	0.1%
Professional, Scientific & Tech. Srv.	5,571	5,658	87	2%	0.3%
Management of Companies	1,818	1,901	83	5%	0.7%
Admin. Support & Cleaning Srv.	6,399	8,738	2,339	37%	5.3%
Education	1,067	1,389	322	30%	4.5%
Health & Social Assistance	16,871	18,966	2,095	12%	2.0%
Arts, Entertainment & Recreation	1,542	2,163	621	40%	5.8%
Accommodations & Food Services	11,746	12,737	991	8%	1.4%
Other Services (except Public Admin.)	5,552	5,674	122	2%	0.4%
Private Non-Classified	49	45	-4	-8%	-1.4%
Government	22,398	24,133	1,735	8%	1.3%
Total	137,432	150,981	13,549	10%	2.4%

Source: Oregon Employment Department, Oregon Labor Market Information System, Covered Employment & Wages. Summary by industry and percentages calculated by ECONorthwest

Note: AAGR is average annual growth rate

Table A-6 shows a summary of employment in Lane County in 2007. Table A-6 shows the ten largest sectors in **bold** are the top ten employers, sectors with below average pay per employee in **red**, and sectors with above average pay per employee in **blue**. Table A-6 shows:

- Construction, Manufacturing, Government, and Health and Social Assistance were among the sectors with the greatest employment in Lane County and have above average pay per employee. These sectors accounted for 47% of employment or nearly 71,000 employees in Lane County.
- Retail, Accommodations and Food Services, and Administration and Support and Waste Management were among the sectors with the greatest employment in Lane County and have below average pay per employee. These sectors accounted for 27% of employment or more than 41,000 employees in Lane County.

Table A-6. Covered employment in Lane County, 2007

Sector/Industry	Establish- ments	Employment	Percent of Employment	Average Pay per Employee
Natural Resources & Mining	228	2,062	1%	\$34,662
Construction	1,249	8,034	5%	\$41,346
Construction of buildings	445	445	0%	\$445
Specialty trade contractors	695	695	0%	\$695
Manufacturing	599	19,864	13%	\$41,055
Wood product manufacturing	76	4,548	3%	\$42,423
Machinery manufacturing	51	1,816	1%	\$48,027
Computer & electronic product mfg.	20	1,934	1%	\$56,594
Transportation equipment mfg.	31	4,093	3%	\$31,942
Wholesale	588	6,071	4%	\$44,609
Retail	1,276	19,755	13%	\$24,258
Motor vehicle & parts dealers	159	2,997	2%	\$39,809
Building material & garden supply stores	85	1,603	1%	\$27,883
Food & beverage stores	205	4,044	3%	\$20,451
General merch&ise stores	58	4,073	3%	\$21,784
Miscellaneous store retailers	174	1,455	1%	\$20,513
Transportation, Warehousing & Utilities	267	3,047	2%	\$37,448
Information	180	3,901	3%	\$50,769
Finance & Insurance	611	4,313	3%	\$49,753
Credit intermediation & related activities	252	252	0%	\$252
Insurance carriers & related activitie	230	230	0%	\$230
Real Estate Rental & Leasing	566	2,530	2%	\$25,994
Professional, Scientific & Technical Svcs	1,004	5,658	4%	\$41,314
Management of Companies	87	1,901	1%	\$66,758
Admin. & Support & Waste Mgmt	484	8,738	6%	\$21,771
Private Education	135	1,389	1%	\$23,709
Health & Social Assistance	971	18,966	13%	\$39,836
Ambulatory health care services	598	6,453	4%	\$52,408
Nursing & residential care facilities	181	3,915	3%	\$22,013
Arts, Entertainment & Recreation	151	2,163	1%	\$13,533
Accommodations & Food Services	861	12,737	8%	\$13,749
Accommodation	100	100	0%	\$100
Food services & drinking places	734	734	0%	\$734
Other Services	1,322	5,674	4%	\$22,345
Repair & maintenance	309	309	0%	\$309
Membership associations & organization	437	437	0%	\$437
Private Non-Classified	66	45	0%	\$41,167
Government	376	24,133	16%	\$39,312
Federal	70	1,764	1%	\$57,977
State	61	6,878	5%	\$39,498
Local	245	15,491	10%	\$37,105
Education & Health Services	147	8,547	6%	\$31,343
Public Administration	49	4,268	3%	\$47,464
Total	11,021	150,981	100%	\$34,328

Source: Oregon Employment Department, Oregon Labor Market Information System, Covered Employment & Wages. Summary by industry and percentages calculated by ECONorthwest

Notes: Sectors in **bold** are the top ten employers, sectors in **red** have below average pay per employee, and sectors in **blue** have above average pay per employee.

Note: Average pay per employee is shown as reported by the Oregon Employment Department.

EMPLOYMENT IN SPRINGFIELD

Table A-7 shows a summary of confidential employment data for Springfield in 2006. Springfield had 27,310 jobs at 1,819 establishments in 2006, with an average firm size of 15 employees. The sectors with the greatest employees were: Retail (13%), Government (13%), Health Care and Social Assistance (11%), and Manufacturing (10%). These sectors accounted for 17,863 or 65% of Springfield's jobs.

Table A-7. Covered employment in Springfield, 2006

Sector / Industry	Establish- ments	Employees	
		Number	% of Total
Agriculture, Forestry, Fishing, and Mining	22	282	1%
Forestry and Logging	11	136	0%
Other Agriculture, Forestry, Fishing, and Mining	11	146	1%
Construction	205	1,922	7%
Manufacturing	104	2,714	10%
Wood Product Manufacturing	18	1,013	4%
Chemical Manufacturing	3	251	1%
Fabricated Metal Product Manufacturing	18	233	1%
Transportation Equipment Manufacturing	7	188	1%
Food Manufacturing	6	111	0%
Plastics and Rubber Products Manufacturing	6	111	0%
Furniture and Related Product Manufacturing	9	80	0%
Machinery Manufacturing	7	68	0%
Other Manufacturing	30	659	2%
Wholesale Trade	71	1,230	5%
Retail	265	3,632	13%
General Merchandise Stores	24	1,008	4%
Food and Beverage Stores	42	744	3%
Motor Vehicle and Parts Dealers	35	339	1%
Building Material, Garden Equipment, & Supplies Dealers	15	278	1%
Electronics and Appliance Stores	16	210	1%
Other Retail	133	1,053	4%
Transportation and Warehousing and Utilities	55	941	3%
Information	24	1,356	5%
Finance and Insurance	99	1,110	4%
Real Estate and Rental and Leasing	98	441	2%
Professional, Scientific, and Technical Services	97	576	2%
Management of Companies and Enterprises	24	343	1%
Admin. & Support and Waste Mgt Services	82	2,460	9%
Private Educational Services	12	109	0%
Health Care and Social Assistance	167	3,069	11%
Arts, Entertainment, and Recreation	30	321	1%
Accommodation and Food Services	179	2,453	9%
Accommodation	12	227	1%
Food Services and Drinking Places	167	2,226	8%
Other Services	217	816	3%
Government	68	3,535	13%
Federal and State	13	368	1%
Local	55	3,167	12%
Total	1,819	27,310	100%

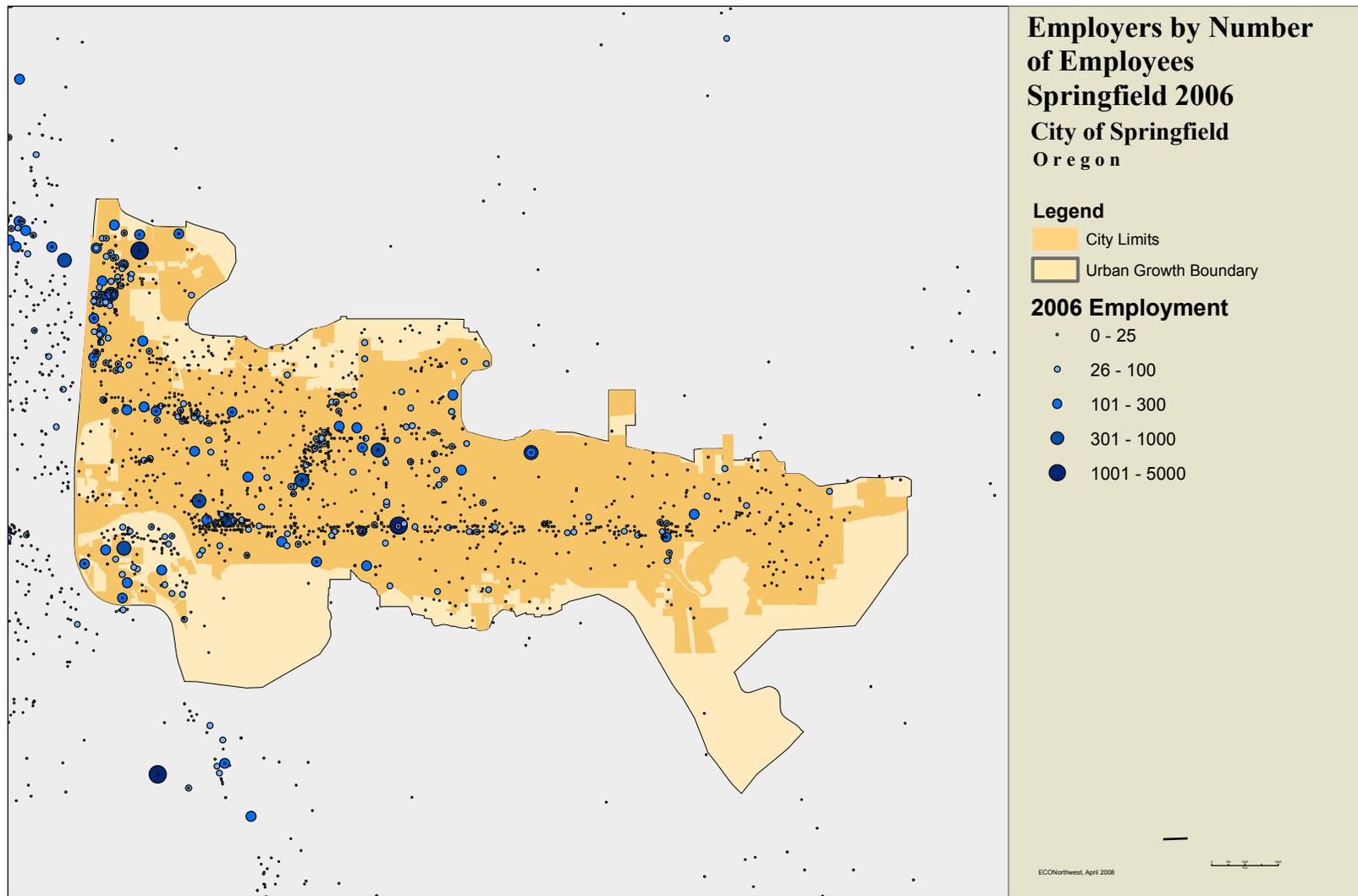
Source: Oregon Employment Department Quarterly Census of Employment and Wages (QCEW). Summary by industry and percentages calculated by ECONorthwest

Note: The percent column does not add to 100% as a result of rounding errors.

Map A-1 shows employment in Springfield by plan designations and number of employees in 2006. Map A-1 shows that employees are distributed throughout Springfield, with concentrations along Main Street and in Gateway.

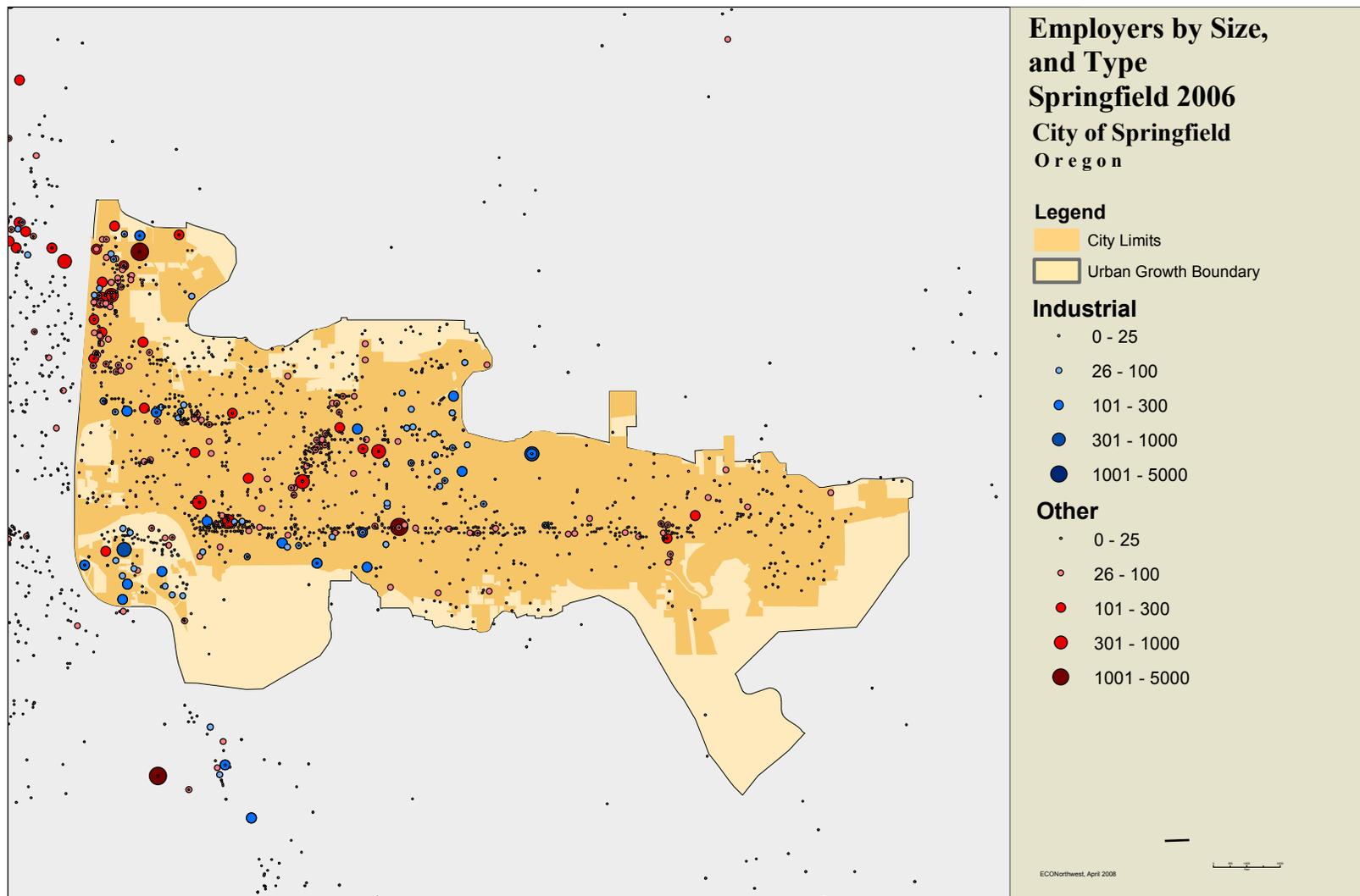
Map A-2 shows the size of employers in Springfield by Plan Designation. Larger employers are clustered along Main Street, in Gateway, and in other areas zoned for commercial and industrial use. Small employers are scattered in most parts of the City.

Map A-1. Employment by Employer Size, 2006



Source: Oregon Employment Department Quarterly Census of Employment and Wages (QCEW and Springfield GIS data).

Map A-2. Employment by Size and Employer Type, 2006



Source: Oregon Employment Department Quarterly Census of Employment and Wages (QCEW and Springfield GIS data).

Firms wanting to expand or locate in Springfield will be looking for a variety of site and building characteristics, depending on the industry and specific circumstances. One way to describe site needs is to group industries based on building and site characteristics. This is consistent with how real estate markets work for urban development – demand for land is derived from demand for space. The type of building and industry is then related to land characteristics needed (e.g., site needs) to accommodate that industry. For this analysis, ECO relates industries by NAICS codes to building types which are used as a proxy for site needs. Each sector has been uniquely assigned to a “typical” building type, grouped by industrial and commercial uses.

Table A-8. Converting employment to building types

Building Type	Types of industries	NAICS Sectors
Industrial		
W D	Warehousing & Distribution	Transportation & Wholesale Trade
		48-49, 42
GI	General Industrial	Ag, Mining, Utilities, Construction, Manufacturing
		11, 21, 22, 23, 31-33
Commercial		
Office	Office	Information, FIRE, Professional Srv, Mgt of Companies, Adm in & Support & Waste Mgt, Utilities, Arts/Entertainment, Other Services
		51-56, 71, 81
Retail	Retail	Retail (incl. Accom & Food Srv)
		44-45, 72
Med/Gov.	Medical & Government Institutions	Health & Social Services, Public Administration
		61, 62, 92

Source: ECONorthwest based on methodology used by Metro in the report “Urban Growth Report: An Employment Need Analysis,” 2002

Table A-9 shows employment by Comprehensive Plan Designation in 2006. About 39% of Springfield’s employment is located in commercial plan designations, with more than 8,000 employees in the Commercial designation. An additional 34% of the City’s employment is located in industrial designations. About 16% of Springfield’s employment is located in residential designations with 10% in the Low Density Residential designation.

Table A-9. Covered employment by Plan Designation, Springfield, 2006

Plan Designation	Industrial		Commercial		Total	
	Emp.	Percent	Emp.	Percent	Emp.	Percent
Commercial						
Commercial	450	5.7%	7,649	39.8%	8,099	29.9%
Major Retail Center	20	0.3%	2,316	12.1%	2,336	8.6%
Subtotal	470	6.0%	9,965	51.9%	10,435	38.5%
Government						
Government & Education	67	0.9%	660	3.4%	727	2.7%
Industrial						
Campus Industrial	274	3.5%	2,142	11.1%	2,416	8.9%
Heavy Industrial, Special Heavy Industrial, and Sand and Gravel	2,908	36.9%	304	1.6%	3,212	11.7%
Light Medium Industrial	3,032	38.5%	645	3.4%	3,677	13.6%
Subtotal	6,214	78.9%	3,091	16.1%	9,305	34.3%
Mixed-Use						
Commercial Mixed Use	318	4.0%	1,450	7.5%	1,768	6.5%
Light Med Ind Mixed Use and Medium Density Res Mixed	113	1.4%	169	0.9%	282	0.7%
Subtotal	431	5.5%	1,619	8.4%	2,050	7.6%
Residential						
High Density Residential	0	0.0%	456	2.4%	456	1.7%
Low Density Residential	592	7.5%	2,093	10.9%	2,685	9.9%
Medium Density Residential	100	1.3%	1,082	5.6%	1,182	4.4%
Subtotal	692	8.8%	3,631	18.9%	4,323	16.0%
Other						
Parks and Open Space	0	0.0%	250	1.3%	250	0.9%
TOTAL	7,874	100.0%	19,216	100.0%	27,090	100.0%

Source: Oregon Employment Department Quarterly Census of Employment and Wages (QCEW) and Springfield GIS data; calculations and analysis by ECONorthwest

Note: The number of employees shown in Table A-9 (27,090) is fewer than shown in Table A-7 (27,310) because of data issues between the QCEW and GIS data.

Table A-10 shows the estimated covered employment located in non-residential plan designations by type of building in Springfield in 2006. More than half of Springfield's employment in 2006 was located in Office and Retail buildings. More than two-thirds of Springfield's firms were located in Office and Retail buildings.

Table A-10. Estimated covered employment in non-residential plan designations by type of building, Springfield, 2006

Building Type	Employees		Firms	
	Number	Percent	Number	Percent
W D	2,457	11%	50	8%
G I	4,336	20%	101	17%
Office	6,212	28%	192	31%
Retail	5,500	25%	220	36%
Med/Gov	3,604	16%	49	8%
Total	22,109	100%	612	100%

Source: ECONorthwest based on QCEW data

Table A-11 shows the distribution of employees by building type and site size in non-residential plan designations in Springfield in 2006. About 22% of Springfield's employment is on sites 5 to 20 acres, 21% is on sites less than 1-acre, and 19% is on sites greater than 50 acres.

Table A-11. Percent of employees by building type and site sizes, Springfield, 2006

Building Type	Site Size (acres)						Total Employees
	Less than 1	1 to 2	2 to 5	5 to 20	20 to 50	Greater than 50	
W D	13%	6%	3%	63%	12%	3%	100%
G I	15%	17%	17%	18%	2%	31%	100%
Office	28%	14%	15%	23%	13%	8%	100%
Retail	29%	13%	11%	18%	10%	18%	100%
Med/Gov	9%	4%	8%	5%	35%	38%	100%
Total	21%	12%	12%	22%	13%	19%	100%

Source: ECONorthwest based on QCEW data

Note: Total Employees may not add to 100% because of rounding errors.

The percent of employees by building type and site size was calculated based on the number of employees in each building type and site size categories using QCEW data and City of Springfield tax lot data.

BUSINESS CLUSTERS

One way to assess the types of businesses that are likely to have future growth in an area is to examine relative concentration and employment growth of existing businesses. This method of analysis can help determine relationships and linkages within industries, also called industrial clusters. Sectors that are highly concentrated (meaning there are more than the "average" number of businesses in a sector in a given area) and have had high employment growth are likely to be successful industrial cluster. Sectors with either high concentration of businesses or high employment group may be part of an emerging cluster, with potential for future growth.

The Oregon Economic and Community Development Department (OECD) prepared a report titled "Oregon's Traded Clusters: Major Industries and Trends." This report identified 25 clusters in Lane County.

- **Business Services.** This cluster is dominated by Professional, Scientific, and Technical Services and Employment Services. The average annual wage varies by sector, with the highest pay in Professional, Scientific, and Technical Services (about \$51,800). Employment growth in these industries was moderate to fast between 2003 and 2005. Business Services firms may be attracted to Springfield as a result of firms located in Springfield, the availability of educated workers within the region, and the high quality of life and access to recreation in Springfield.
- **Communication Equipment** This cluster includes manufacturing and wholesaling of computer, communications, and audio and video equipment. Lane County has clusters of both manufacturing and wholesaling communication equipment but the manufacturing cluster is bigger in the County. Employment growth in the cluster was fastest in computer and peripheral manufacturing between 2003 and 2005. The average annual wage in this sector is higher than the State average, at \$68,076. Firms in this cluster may be attracted to Springfield as the City's location and access to transportation, the availability of educated workers within the region, and the high quality of life and access to recreation in Springfield.
- **Information Technology.** This cluster includes Telecommunications, Software Publishers, and Internet Service Providers. The average annual wage was above State averages. Growth in the cluster varied between 2003 and 2005, with a decrease in Telecommunications employment and increases in employment with Internet Service Providers. Information Technology firms may be attracted to Springfield because of the availability of educated workers within the region and the high quality of life and access to recreation in Springfield. Springfield may be attractive as a location to outsource back-office functions for larger Information Technology firms.
- **Logistics and Distribution.** This cluster includes truck transportation and warehousing. This cluster grew during the 2003-2005 period, with the greatest growth in Truck Transportation. Wages in this cluster were similar to State averages. Firms in this cluster may be attracted to Springfield as the City's location relative

to other cities in the Willamette Valley and Oregon and the access to transportation via I-5 and Highway 126.

- **Medical products.** This cluster includes medical and equipment supplies manufacturing. This sector has higher than average wages and had moderate employment growth during the 2003 to 2005 period. Firms may be attracted to Springfield as a result of firms located in Springfield, the availability of educated workers within the region, and the high quality of life and access to recreation in Springfield.
- **Metals and Related Products.** This cluster includes metals manufacturing, including Fabricated Metals Manufacturing and Primary Metals Manufacturing. Although employment decreased in this cluster over the 2003-2005 period, Lane County has the largest cluster of Metal Wholesalers outside of the Portland metropolitan area. Wages in this cluster were general at or above State averages. Firms may be attracted to Springfield as a result of existing businesses and the availability of labor.
- **Processed Foods and Beverages.** This cluster includes manufacturing of food and beverages. Employment in this cluster decreased over the 2003-2005 period and average wages in this cluster are at or below State averages. Firms may be attracted to Springfield as a result of the City's proximity to food growers and the availability of labor.
- **Wood and Other Forest Products.** This cluster includes wood product manufacturing, logging, paper making, and support activities. The average annual wage was below State averages and employment grew slowly within the cluster over the 2003-2005 period. Firms may be attracted to Springfield as a result of the City's proximity to natural resources and the availability of labor.

Table A-12 shows potential growth sectors in Springfield, based on existing concentrations of employment and the Oregon Employment Department's (OED) forecast for employment growth over the 2006-2016 period. Sectors with high employment concentration and high growth forecasts are the industries most likely to grow. These sectors are: Health and Social Assistance; Administrative and Support and Waste Management Services; Construction; and Accommodations and Food Services.

Springfield may have opportunities for growth in sectors that the OED forecasts will have high growth but Springfield does not currently have

high concentrations in: Arts, Entertainment, and Recreation; Management of Companies and Enterprises; Professional, Scientific, and Technical Services; and Private Educational Services.

Table A-12. Potential growth of industries in Springfield

Low Employment Growth Projection for Lane County	High Employment Growth Projection for Lane County
High Employment Concentration in Springfield (relative to Oregon)	
Information	Health Care & Social Assistance
Finance & Insurance	Admin. & Support & Waste Mgt Srv.
Transportation, Warehousing & Utilities	Construction
Real Estate & Rental & Leasing	Accommodation & Food Srv.
Wholesale Trade	
Low Employment Concentration in Springfield (relative to Oregon)	
Government	Arts, Entertainment, & Recreation
Other Srv.	Management of Companies & Enterprises
Manufacturing	Professional, Scientific, & Technical Srv.
Retail	Private Educational Srv.
Agriculture, Forestry, Fishing, & Mining	

Source: Oregon Employment Department; calculations by ECONorthwest

REGIONAL BUSINESS ACTIVITY

Springfield exists within with Eugene-Springfield regional economy. Springfield is able to attract labor from across the region, Springfield employers and residents benefit from training opportunities present in Eugene (e.g., the University of Oregon and Lane Community College), and Springfield businesses and residents are effected by economic activity within the region. This section presents the large-scale regional business activities.

- Peace Health at RiverBend.** Peace Health has built a new hospital complex at RiverBend and will complete the transition of staff from the University District facility to RiverBend by the end of Sept. 2008. The RiverBend campus will have 2,500 PeaceHealth employees, in occupations including: physicians, nurses, medical technicians, other medical staff, environmental services staff, and food services staff. PeaceHealth started relocating administrative and other staff to the RiverBend Annex in 2006, which has 700 employees.

The RiverBend campus will attract additional firms. For example, Oregon Medical Labs, Oregon Imaging Center, and the Northwest Specialty Clinics will have approximately 350 staff and physicians at the RiverBend campus. The RiverBend Pavilion will have about 300 employees, at the Oregon Medical Group, Oregon Imaging, and other medical businesses.

PeaceHealth plans to further develop the RiverBend campus to include a wide range of uses: a mixture of housing types, office and commercial support services, retail, and educational and research functions to support collaborations with Oregon Health Services University and the University of Oregon. Studies for the RiverBend master plan indicated that there may be demand for additional office development (400,000-500,000 square feet) and commercial retail services (50,000 to 70,000 square feet).

- **Manufacturing.** Manufacturing is important to the economy in Springfield and in Lane County. Manufacturing accounted for 14% of employment (more than 20,000 jobs) in Lane County and 10% of employment (more than 2,700 jobs) in Springfield in 2006.⁷²

Manufacturing is a traded sector industry, which brings revenue into Oregon and Lane County from outside the State. The following manufacturing industries accounted for two-thirds (\$11 billion) of revenue from exports in Oregon in 2007: Computer & Electronic Production, Transportation Equipment, Machinery Manufacturers, Chemical Manufacture, and Primary Metal Manufacturers.⁷³ These industries are all present in Lane County, accounting for 44% of manufacturing employment in the County. Other export industries with substantial employment in Lane County are: Woods Products Manufacturing, Food Manufacturing, and Fabricated Metal Product Manufacturing.⁷⁴

- **Recreational Vehicles.** Lane County has a cluster of recreational vehicles (RVs) manufacturers and retailers. Two of Lane County's largest manufacturers are Monaco Coach and County Coach. Employment in RV manufacturing has declined since 2006 as a result of declining demand for RVs due, in part, to increases in gasoline costs. High energy costs may continue to depress demand for RVs, at least in the next two to five years.
- **Wood Products and Paper Manufacturing.** Manufacturing timber-related products has historically been a source of

⁷² Oregon Employment Department

⁷³ "Economic Data Packet, Mary 2008," Oregon Economic And Community Development Department

⁷⁴ Oregon Employment Department

employment and exports in Lane County. Employment in these industries has declined since the 1980's but continues to account for more than one-quarter of manufacturing employment in Lane County in 2006. Continued changes create uncertainty for future employment in these industries. For example, Weyerhaeuser, one of Lane County's largest employers, announced in March 2008 that it was selling several facilities in Oregon and Lane County to International Paper Corporation. It is unclear whether and how this sale will impact employment in paper manufacturing.

- **Call centers.** The trend towards domestic outsourcing of back-office functions has lead several companies to locate call centers in the Eugene-Springfield area. The largest among these call centers is Symantec, located in Springfield. Other recent call centers to locate in the Eugene-Springfield area include Royal Caribbean and Enterprise. The Eugene-Springfield's trained labor pool of relatively low-cost workers for call centers gives the region an advantage for attracting additional call centers.
- **Tourism.** Tourism brings economic activity into an area from outside sources. Tourism expenditures in Lane County in 2006 grew 7.5%, to \$553 million, exceeding the statewide tourism growth rate for the year. Tourism accounts for about 7,500 jobs in Lane County.⁷⁵

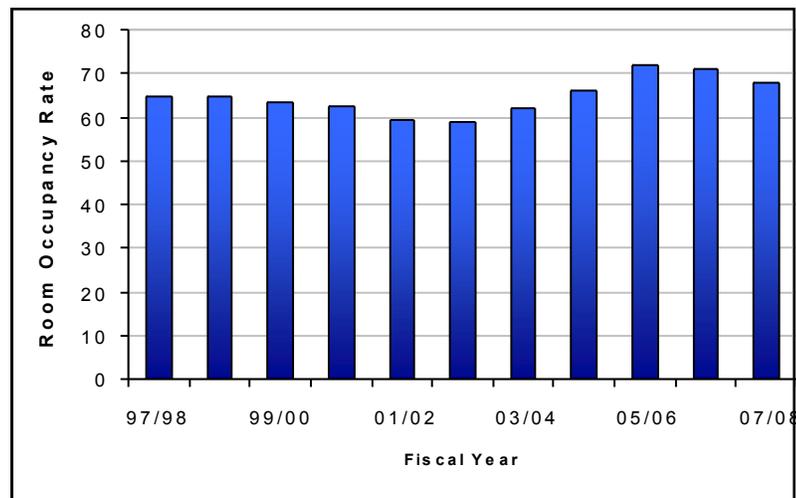
A major source of tourism spending is overnight accommodations. In 2008, the Eugene-Springfield Region has 3,118 total rooms. Since 1997, 629 limited service hotel rooms were added. During the same period, 377 full service rooms, 92 limited service rooms, and 15,464 square feet of meeting space have closed.⁷⁶

Figure A-5 shows the hotel occupancy rate in the Eugene-Springfield Region from fiscal year 1998 to fiscal year 2008. The Region's occupancy rate varied from 59% in fiscal year 2002 and 2003 to 72% in fiscal year 2006.

⁷⁵ Convention & Visitors Association of Lane County Oregon, CVALCO

⁷⁶ Convention & Visitors Association of Lane County Oregon, CVALCO

Figure A-5. Hotel room occupancy rate, Eugene-Springfield Region, Fiscal Years 1998 to 2008



Source: Convention & Visitors Association of Lane County Oregon, CVALCO
 Note: 2008 data current through March 2008

Springfield levies a 9.5% transient lodging tax on overnight accommodations. Springfield's lodging tax rate is 9.5%. Table A-13 shows transient lodging tax revenue for Lane County and Springfield for fiscal year 2000 through 2008. Springfield's lodging tax revenue varied from \$1.2 million in fiscal year 2004 to \$1.6 million in fiscal year 2007. Springfield's transient lodging tax revenues accounted for about one-quarter of total County revenues.

Table A-13. Transient lodging tax revenues, Lane County and Springfield, Fiscal Years 2000 to 2008

Fiscal Year	Lane County	Springfield	Springfield's % of County
2000	\$4,753,583	\$1,366,788	29%
2001	\$4,834,210	\$1,314,714	27%
2002	\$4,865,320	\$1,265,825	26%
2003	\$4,820,662	\$1,275,426	26%
2004	\$5,095,869	\$1,187,367	23%
2005	\$5,378,361	\$1,242,653	23%
2006	\$6,016,364	\$1,504,813	25%
2007	\$6,611,718	\$1,597,994	24%
2008	\$5,103,490	\$1,235,685	24%

Source: Convention & Visitors Association of Lane County Oregon, CVALCO
 Note: 2008 data current through March 2008

- **Agriculture.** Agricultural production is an important component of Lane County's economy. In 2002, Lane County had approximately \$88 million in total gross sales from agriculture.

Table A-14 shows the top five agricultural products in Lane County in 1997 and 2002. Lane County's agriculture products with the greatest value of sales in 2002 were Nursery (\$21 million) and Milk & dairy (\$10.3 million). Milk & dairy had the largest average sales value per farm (\$1.1 million), nearly double the 1997 average sales value for dairies in 1997 (\$0.6 million). This change may indicate that dairies have grown larger over the five-year period.

Other important changes are the decrease in value of sales for poultry and eggs (down \$4.2 million) cattle and calves (down \$2.2 million). The decrease in sales for cattle and calves may be explained by the decrease of 248 farms with cattle and calves.

Table A-14. Six agricultural products with the highest sales value, Lane County 1997 and 2002

Item	Value of Sales	Farms	Average Value of Sales per Farm
2002 Total Sales			
Nursery, greenhouse, floriculture, & sod	\$ 21,001,000	208	\$ 100,966
Milk & other dairy products from cows	\$ 10,290,000	9	\$ 1,143,333
Cattle & calves	\$ 7,622,000	779	\$ 9,784
Fruits, tree nuts, & berries	\$ 6,683,000	382	\$ 17,495
Vegetables, melons, potatoes, & sweet potatoes	\$ 5,955,000	155	\$ 38,419
Poultry & eggs	\$ 5,919,000	218	\$ 27,151
1997 Total Sales			
Poultry & eggs	\$ 10,074,000	144	\$ 69,958
Cattle & calves	\$ 9,780,000	1,027	\$ 9,523
Milk & other dairy products from cows	\$ 7,306,000	13	\$ 562,000
Fruits, tree nuts, & berries	\$ 6,842,000	303	\$ 22,581
Vegetables, melons, potatoes, & sweet potatoes	NA	NA	NA
Nursery, greenhouse, floriculture, & sod	NA	NA	NA

Source: USDA Census of Agriculture, 2002; Calculations by ECONorthwest

Note: The definition of the following categories of farm products changed between 1997 and 2002: Nursery, greenhouse, floriculture, and sod; Other crops and hay; and vegetables, melons, potatoes, and sweet potatoes. These changes prevent direct comparison between the Total Sales of these agricultural products in 1989 and 2002.

OUTLOOK FOR GROWTH IN SPRINGFIELD

Table A-15 shows the population forecast developed by the Office of Economic Analysis for Oregon and Lane County for 2000 through 2040. Lane County is forecast to grow at a slower rate than Oregon over the 2005 to 2030 period. The forecast shows Lane County's population will grow by about 96,600 people over the 25-year period, a 29% increase. Over the same period, Oregon is forecast to grow by more than 1.2 million people, a 35% increase.

**Table A-15. State population forecast,
Oregon and Lane County, 2000 to 2040**

Year	Lane	
	Oregon	County
2000	3,436,750	323,950
2005	3,618,200	333,855
2010	3,843,900	347,494
2015	4,095,708	365,639
2020	4,359,258	387,574
2025	4,626,015	409,159
2030	4,891,225	430,454
2035	5,154,793	451,038
2040	5,425,408	471,511
Change 2005 to 2030		
Amount	1,273,025	96,599
% Change	35%	29%
AAGR	1.2%	1.0%

Source: Office of Economic Analysis

Note: AAGR is average annual growth rate

Table A-16 shows the Oregon Employment Department's forecast for employment growth by industry for Lane County over the 2006 to 2016 period. The sectors that will lead employment growth in Lane County for the ten-year period are Health Care & Social Assistance (adding 5,600 jobs), Government (adding 3,600 jobs), Professional and Business Services (adding 3,000 jobs), Leisure & Hospitality (adding 2,800 jobs), and Retail Trade (adding 2,400 jobs). Together, these sectors are expected to add 17,400 new jobs or 76% of employment growth in Lane County.

Table A-16. Nonfarm employment forecast by industry in Lane County, 2006-2016

Sector / Industry	2006	2016	Change 2006-2016	
			Amount	% Change
Natural resources & Mining	900	900	0	0%
Construction	8,000	9,200	1,200	15%
Manufacturing	20,300	21,000	700	3%
Durable Goods	16,300	16,900	600	4%
Wood product mfg.	4,700	4,500	-200	-4%
Transportation equip. mfg.	4,400	4,700	300	7%
Nondurable goods	4,000	4,100	100	3%
Transportation, & utilities	3,300	3,700	400	12%
Wholesale trade	5,900	6,500	600	10%
Retail trade	19,700	22,100	2,400	12%
Information	3,700	4,100	400	11%
Financial activities	8,300	9,300	1,000	12%
Professional & business srv.	16,100	19,100	3,000	19%
Administrative & support srv.	8,200	9,700	1,500	18%
Education	1,500	1,900	400	27%
Health care & social assist.	18,100	23,700	5,600	31%
Health care	15,400	20,500	5,100	33%
Leisure & hospitality	14,200	17,000	2,800	20%
Accommodation & food srv.	12,100	14,300	2,200	18%
Food srv. & drinking places	10,700	12,700	2,000	19%
Other srv.	5,100	5,700	600	12%
Government	28,400	32,000	3,600	13%
Federal government	1,800	1,700	-100	-6%
State government	11,300	13,200	1,900	17%
State education	8,700	10,200	1,500	17%
Local government	15,400	17,100	1,700	11%
Local education	8,600	9,300	700	8%
Total nonfarm employment	153,400	176,100	22,700	15%

Source: Oregon Employment Department. Employment Projections by Industry 2004-2014. Projections summarized by ECONorthwest.

Note: Percent Change was calculated based on the change in employees divided by the number of employees in 2006. For example, Retail trade's expected percent change is 15% because 2,400 employees is 12% of the 19,700 employees in retail trade in 2006 (2400 divided by 19700 = 15%).

Factors Affecting Future Economic Growth in Springfield

Appendix B

This appendix presents a detailed analysis consistent with the requirements of OAR 660-009-0015(4) of Springfield’s comparative advantage relative to the Eugene/Springfield area, Lane County, Willamette Valley, and Oregon. The information presented in this appendix is summarized in Chapter 3.

Goal 9 requires cities to identify the number and characteristics of sites “the number of sites by type reasonably expected to be needed to accommodate the expected employment growth based on the site characteristics typical of expected uses (OAR 660-009-0014(2)).” In developing this assessment, cities are encouraged to examine existing firms in the planning area to identify the types of sites that may be needed for expansion (OAR 660-009-0015(2)). Cities are required to “estimate the types and amounts of industrial and other employment uses likely to occur in the planning area,” taking into consideration relevant economic advantages and disadvantages (OAR 660-009-0015(4)).

Identifying the number and characteristics of needed sites starts with understanding the types of businesses that may locate in Springfield over the 20-year planning period. Consistent with the requirements of Goal 9, these industries are grouped into “major categories of industrial or other employment uses” (OAR 660-009-0015(1)). This grouping is commonly referred to as “target industries.”

This appendix summarizes the factors that affect the types of businesses likely to locate in Springfield. These factors are a key consideration when identifying Springfield’s target industries (in Chapter 4).

WHAT IS COMPARATIVE ADVANTAGE

Each economic region has different combinations of productive factors: land (and natural resources), labor (including technological expertise), and capital (investments in infrastructure, technology, and public services). While all areas have these factors to some degree, the mix and condition of these factors vary. The mix and condition of productive factors may allow firms in a region to produce goods and services more cheaply, or to generate more revenue, than firms in other regions.

By affecting the cost of production and marketing, comparative advantages affect the pattern of economic development in a region

relative to other regions. Goal 9 and OAR 660-009-0015(4) recognizes this by requiring plans to include an analysis of the relative supply and cost of factors of production.⁷⁷ An analysis of comparative advantage depends on the geographic areas being compared. In general, economic conditions in Springfield will be largely shaped by national and regional economic conditions affecting the Willamette Valley. Chapter 2 and Appendix A present trends and forecasts of conditions in Oregon and Springfield to help establish the context for economic development in Springfield. Local economic factors will help determine the amount and type of development in Springfield relative to other communities in Oregon.

This appendix focuses on the comparative advantages of Springfield relative to the rest of Oregon. The implications of the factors that contribute to Springfield's comparative advantage are discussed at the end of this chapter.

LOCATION

Springfield is a city with a population of approximately 57,320 people in 2007, located in the Southern Willamette Valley. Interstate 5 runs to the west of Springfield and Highway 126 runs east-west through Springfield. Springfield is located between the Willamette River (to the south) and McKenzie River (to the north). Springfield's location will continue to impact Springfield's future economic development.

- Springfield shares a border with Eugene, the 2nd largest city in the State of Oregon, with a population of approximately 153,690 people in 2007. The Eugene-Springfield Metropolitan Statistical Area (MSA), which includes all of Lane County, had more than 343,000 people in 2007, accounting for 9% of Oregon's population.
- Springfield has easy access to the State's highway system and other transportation opportunities. Interstate 5 runs to the west of Springfield and Highway 126 is the main east-west route through Springfield. Residents and businesses in Springfield can access other modes of transportation in Eugene, including the Eugene Airport, Greyhound bus service, and passenger rail service.
- Residents of Springfield have easy access to shopping, cultural activities, indoor and outdoor recreational activities, and other amenities in Springfield, Eugene, and rural Lane County.

⁷⁷ OAR 660-009-0015(4) requires assessment of the "community economic development potential." This assessment must consider economic advantages and disadvantages—or what Goal 9 broadly considers "comparative advantages."

- Springfield residents have several opportunities for post-secondary education: the University of Oregon, Lane Community College, Northwest Christian College, and Gutenberg College.

Springfield's location, access to I-5 and Highway 126, and proximity to Eugene are primary comparative advantages for economic development in Springfield.

BUYING POWER OF MARKETS

The buying power of Springfield and the Eugene-Springfield area forms part of Springfield's comparative advantage by providing a market for goods and services. Table B-1 shows the combined total expenditures for households in Springfield and the Eugene-Springfield Metropolitan Statistical Area (MSA) in 2008. Households in Springfield are expected to spend about \$937 million in 2008, about 14% of total household expenditures in the Eugene-Springfield MSA.

Table B-1. Aggregate annual household expenditures for common purchases, Springfield and the Eugene-Springfield Metropolitan Statistical Area (MSA), 2008

	Springfield	Eugene/ Springfield MSA	Springfield % of MSA Spending
Apparel	\$ 78,765,734	\$ 548,162,423	14%
Entertainment	\$ 106,917,462	\$ 777,731,151	14%
Food at Home	\$ 135,808,782	\$ 875,120,493	16%
Health Care	\$ 72,511,784	\$ 534,882,328	14%
Household Equipment	\$ 48,498,974	\$ 367,679,233	13%
Shelter-Related Expenses	\$ 49,925,453	\$ 369,146,828	14%
Transportation	\$ 185,522,716	\$ 1,304,243,991	14%
Miscellaneous Items	\$ 259,702,794	\$ 1,890,881,821	14%
Total	\$ 937,653,699	\$ 6,667,848,268	14%

Source: Claritas, 2008

Note: Table B-1 does not include spending on shelter or housing

Table B-2 shows average household expenditures for common purchases in Springfield and the Eugene-Springfield MSA in 2008. Springfield households spend an average of \$42,700 on commonly purchased items, not including housing, which typically accounts for 20% or more of household expenditures. Springfield's households spent less than the regional and nation averages, with about 91% of the \$47,000 average expenditures for all households in the Eugene-Springfield MSA and 84% of national average household expenditures.

Springfield households spent the most on miscellaneous items (\$11,800), such as personal care items, education, child care, pet care, and eating out.

Transportation accounted for 20% of Springfield household expenditures, food at home accounted for 14%, and entertainment accounted for 11% of expenditures. Compared to household spending for the entire MSA or the nation, Springfield households spent a more on food at home and less on household equipment (e.g., home furnishings and major appliances) and shelter-related expenses (e.g., household repairs, fuel, and telephone service).

Table B-2. Average annual household expenditures for common purchases, Springfield and the Eugene-Springfield Metropolitan Statistical Area (MSA), 2008

	Springfield Households		Eugene/ Springfield MSA	Springfield's Expenditures Compared to:	
	Expenditures	% of Total		E/S MSA	U.S
Apparel	\$ 3,589	8%	\$ 3,869	93%	77%
Entertainment	\$ 4,871	11%	\$ 5,490	89%	84%
Food at Home	\$ 6,187	14%	\$ 6,177	100%	98%
Health Care	\$ 3,304	8%	\$ 3,775	88%	77%
Household Equipment	\$ 2,210	5%	\$ 2,595	85%	76%
Shelter-Related Expenses	\$ 2,275	5%	\$ 2,606	87%	75%
Transportation	\$ 8,452	20%	\$ 9,206	92%	90%
Miscellaneous Items	\$ 11,832	28%	\$ 13,347	89%	80%
Total	\$ 42,720	100%	\$ 47,065	91%	84%

Source: Claritas, 2008

Note: Table B-2 does not include spending on shelter or housing, which typically accounts for 20% or more of household expenditures.

Note: The Percent of Total does not add to 100% as a result of rounding errors.

AVAILABILITY OF TRANSPORTATION FACILITIES

Businesses and residents in Springfield have access to a variety of modes of transportation: automotive (Interstate 5, multiple State highways, and local roads); rail (Union Pacific and Amtrak); transit (LTD); and air (Eugene Airport).

Springfield has excellent automotive access for commuting and freight movement. Springfield is located along Interstate 5, the primary north-south transportation corridor on the West Coast, linking Springfield to domestic markets in the United States and international markets via West Coast ports. Springfield has developed along Highway 126, connecting Springfield to rural areas to the East of Springfield. Highway 126 is the primary east-west highway in Lane County, running from Florence to Redmond. Businesses and residents of Springfield also have access to Highway 99 in Eugene and Highway 58 in Pleasant Hill.

Other transportation options in Springfield are:

- **Rail.** Multiple Union Pacific rail lines serve Springfield, providing freight service. There are two primary junctions in Springfield: (1) the Springfield Junction is located in the Glenwood area in Southwest Springfield and (2) the Mohawk Junction is near the city's southern boundary, near 25th St.
- **Transit.** The Lane Transit District (LTD) provides transit service to the Eugene-Springfield region. LTD serves Springfield with multiple bus lines, providing bus service within Springfield and connecting Springfield with Eugene. LTD recently began operating a bus rapid transit (BRT) system, called EmX, which provides service between Springfield Station and Eugene Station. Construction is underway for the new Pioneer Parkway BRT route, which will connect to the Sacred Heart Medical Center, and the Gateway Mall.
- **Air.** The Eugene Airport provides both passenger and freight service for Eugene and Springfield residents. The airport is the second busiest in the state, and the fifth largest in the Pacific Northwest. The airport is served by five commercial airlines, and is the primary airport for a six county region.

Transportation is a comparative advantage that primarily affects the overall type of employment and its growth for the region.

PUBLIC FACILITIES AND SERVICES

Provision of public facilities and services can impact a firm's decision on location within a region but ECO's past research has shown that businesses make locational decisions primarily based on factors that are similar with a region. These factors are: the availability and cost of labor, transportation, raw materials, and capital. The availability and cost of these production factors are usually similar within a region.

Once a business has chosen to locate within a region, they consider the factors that local governments can most directly affect: tax rates, the cost and quality of public services, and regulatory policies. Economists generally agree that these factors do affect economic development, but the effects on economic development are modest. Thus, most of the strategies available to local governments have only a modest effect on the level and type of economic development in the community.

PUBLIC POLICY

Public policy can impact the amount and type of economic growth in a community. The City can impact economic growth through its policies about the provision of land, redevelopment, and infill development. Success at attracting or retaining firms may depend on availability of attractive sites for development, especially large sites. For example, Springfield was attractive as a location of PeaceHealth's new hospital because the City had a large, relatively flat site located relatively near to Interstate 5 and Beltline Highway.

Springfield's decision makers articulated their support for provision of employment land through the economic development strategy and in other policy choices. Objectives in the economic development strategy supporting the provision of employment land include objectives to: (1) provide employment land in a variety of locations, configurations, and site sizes for industrial and other employment uses, (2) provide an adequate competitive short-term supply of suitable land to respond to economic development opportunities as they arise, (3) reserve sites over 20-acres for special developments and industries that require large sites, and (4) provide adequate infrastructure to sites.

The economic development strategy also includes objectives that support redevelopment of existing land within the UGB, especially in Downtown and in Glenwood, and other infill development opportunities. In addition, the City has established financial mechanisms to support redevelopment through the creation of the Glenwood Urban Renewal District and Downtown Urban Renewal District.

TAX POLICY

The tax policy of a jurisdiction is a consideration in economic development policy. Table B-3 shows that Springfield's property tax rate is between \$16.32 and \$18.65 per \$1,000 of assessed value, compared with a state average of \$15.20. The property tax rate in Eugene is more variable than Springfield's, ranging from \$10.31 to \$24.68 per \$1,000 of assessed value.⁷⁸

Table B-3. Property tax rate per \$1,000 assessed value for Springfield, Eugene, and Oregon, 2007.

Area	Tax Rate (per \$1,000 assessed value)
Oregon	\$15.20
Lane County	\$15.47
Springfield	\$16.32 - \$18.65
Eugene	\$10.31 - \$24.68

Source: Oregon Department of Revenue

WATER

Springfield's water provider is the Springfield Utility Board (SUB). Springfield's primary source of water is wells, supplemented by surface water from the Middle Fork of the Willamette River. Springfield has 33 wells in 7 well fields, which provide the majority of Springfield's water. SUB has purchased rights to water from the McKenzie River, to supply future need for water.

Springfield's water treatment plant is located on the Middle Fork of the Willamette River, which provides water treatment for the city. The water treatment plant is at or near capacity, with peak summer residential and commercial irrigation demands exceeding the plant's capacity at times. SUB is addressing peak demands by educating customers peak shifting, the practice of irrigating landscaping in the evening or at night.

SUB is planning upgrades to the water treatment plant in 2008 and 2009 to address issues meeting demand at peak times. SUB is also planning upgrades double the plant's capacity in 2010. Springfield plans to build two additional water treatment plants on the McKenzie River, as demand

⁷⁸ Property tax rates for Springfield and Eugene are a composite of the rates for all properties with an address in Eugene or Springfield. It is almost certain that some of these properties is located outside of both the Eugene and Springfield urban growth boundaries and are subject to unincorporated Lane County tax rates.

for water increases. SUB expects to need the new treatment plants by 2013 to 2018.

SUB has sufficient water to meet expected growth and be able to meet residential and employment needs. SUB is not concerned about its ability to supply water to any type of industry, including water-intensive industries like food processing. SUB has lower water rates than the national average. The combination of available and lower cost water may be an advantage to attracting some types of businesses to Springfield.

WASTEWATER

Springfield's wastewater services are provided by Metropolitan Wastewater Management Commission (MWMC), which operates a wastewater facility that serves Springfield, Eugene, and Lane County. Springfield's wastewater system, which includes the sanitary sewer and other equipment, is managed by Springfield Public Works.

Springfield is about to meet current wastewater demands, except in instances of heavy rainfall. On dry days, Springfield generates about 6 million gallons of wastewater per day. During heavy rainfall, Springfield can generate 100 million gallons of wastewater per day, as a result of infiltration and inflow into wastewater pipes.

Springfield recently completed an update of the Wastewater Master Plan, which identified \$65 million of upgrades to the system, which will provide service to unserved areas in Springfield and address problems with infiltration and inflow into wastewater pipes.

Springfield expects to be able to meet expected growth. The City expects to provide service to 6,100 new equivalent dwelling units, which includes residences and businesses, over the next 20 years. If Springfield needs to expand its urban growth boundary, the City will need to plan how to provide service to the new areas.

LABOR MARKET FACTORS

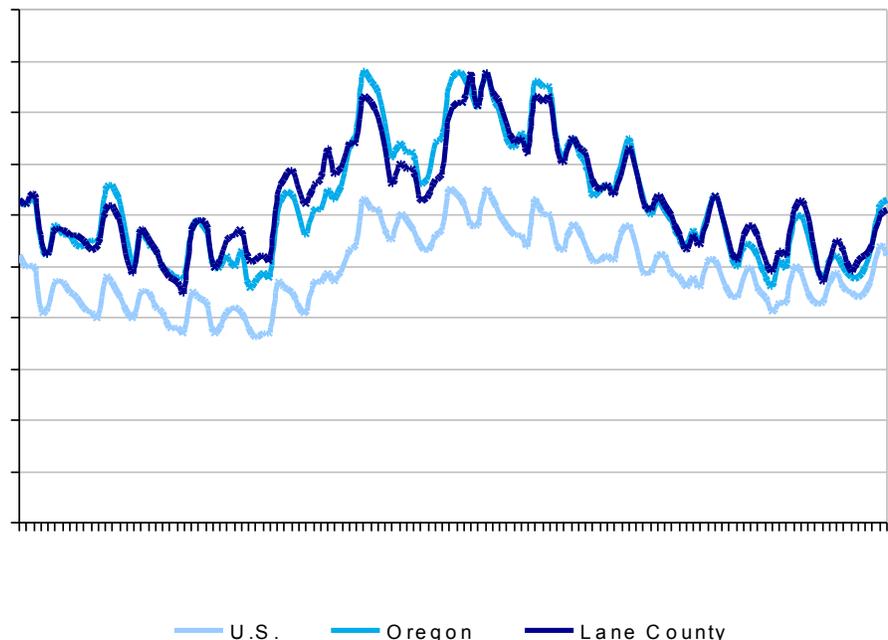
The availability of labor is critical for economic development. Availability of labor depends not only on the number of workers available, but the quality, skills, and experience of available workers as well. This section examines the availability of workers for Springfield.

The labor force in any market consists of the adult population (16 and over) who are working or actively seeking work. The labor force includes both the employed and unemployed. Children, retirees, students, and people who are not actively seeking work are not considered part of the

labor force. According to the 2000 Census, Lane County has more than 166,000 people in its labor force, with 16% of the County's labor force located in Springfield (27,000 participants in the labor force).

The unemployment rate is one indicator of the relative number of workers who are actively seeking employment. Labor force data from the Oregon Employment Department shows that unemployment in Lane County 6.1% in February 2008, lower than the State average of 6.3%. Figure B-1 shows the unemployment rate for Lane County, Oregon, and the United States for the past decade. During this period, Lane County's unemployment has been very similar to the statewide unemployment rate. The County and State unemployment rates have been consistently higher than the national average, but the difference has decreased in recent years.

Figure B-1. Unemployment rates for Lane County, Oregon, and the U.S., January 1998 to February 2008



Source: Bureau of Labor Statistics

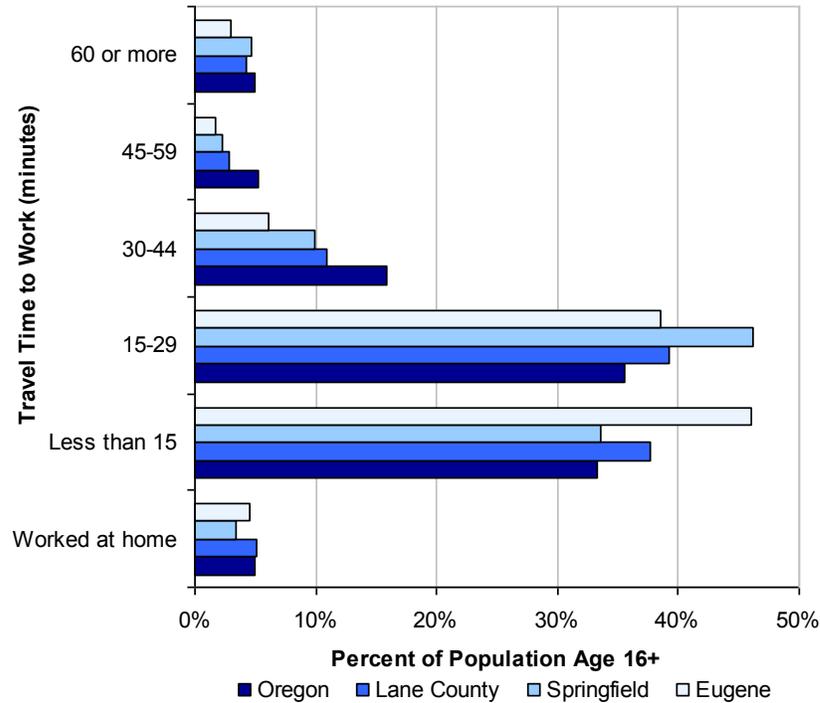
Note: unemployment data is not seasonally adjusted

Another important factor in the labor force is the distance that workers are willing to commute. Figure B-2 shows a comparison of the commute time to work for residents 16 years and older for Oregon, Lane County, Eugene, and Springfield in 2008.

Springfield residents were more likely to have a commute of between 15 and 29 minutes than residents of the State, County, or Eugene. About 46% of Springfield residents commute 15 to 29 minutes, compared with the

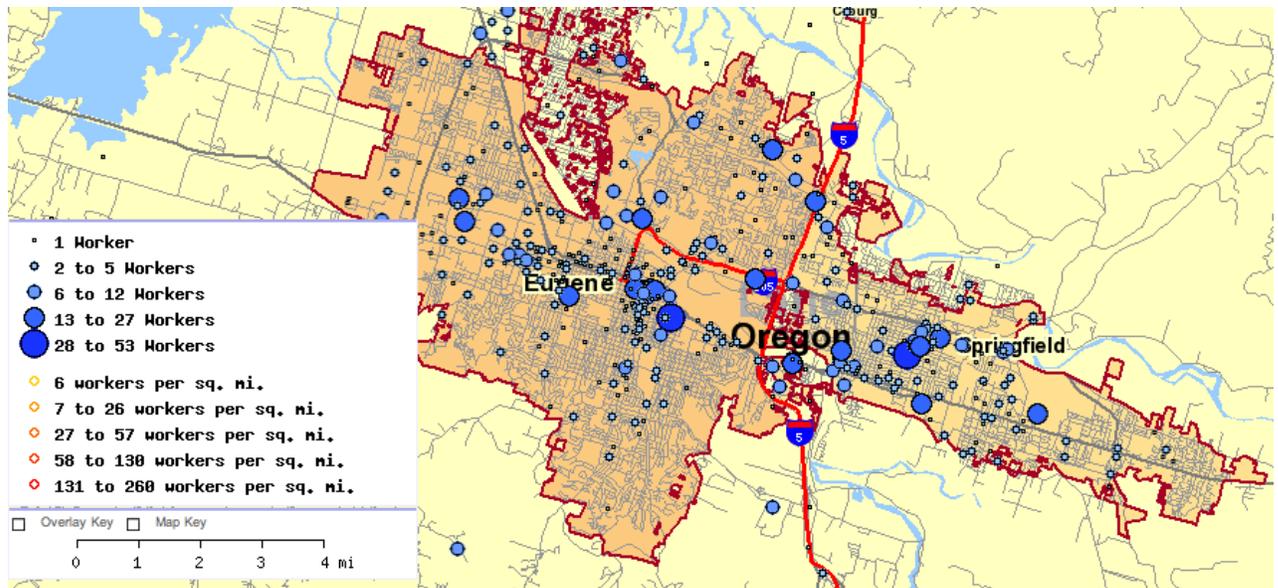
36% of State residents, 39% of County residents, and 38% of Eugene’s residents.

Figure B-2. Commuting time to work in minutes for residents 16 years and older, Oregon, Lane County, Eugene, and Springfield, 2008



Source: Claritas 2008

Figure B-3 and Table B-4 show where residents of Springfield work in 2004. Figure B-3 and Table B-4 show that 81% of Springfield’s residents were employed in Lane County, with 40% of Springfield’s residents working in Eugene and 25% working in Springfield. Close to 1,000 Springfield workers (4%) commute to Multnomah County, the majority of who work in Portland.

Figure B-3. Places that residents of Springfield were employed, 2004

Source: U.S. Census Bureau: LED on the Map

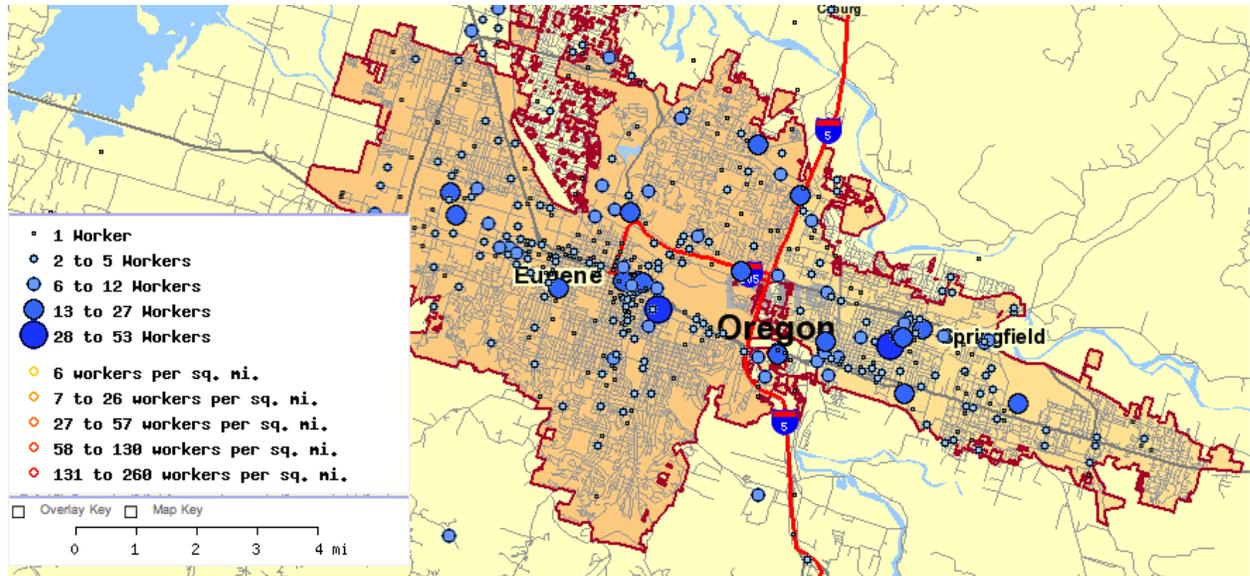
Table B-4. Places that residents of Springfield were employed, 2004

Location	Number	Percent
Lane County	18,649	81%
Eugene	9,261	40%
Springfield	5,675	25%
Coburg	638	3%
Junction City	475	2%
Multnomah Co.	975	4%
Portland	839	4%
All Other Locations	3,385	15%
Total	23,009	100%

Source: U.S. Census Bureau: LED on the Map

Figure B-4 and Table B-5 show where employees of firms located in Springfield lived in 2004. Seventy-nine percent of Springfield's workers lived in Lane County. Twenty-nine percent lived in Springfield, and 23% lived in Eugene. About 27% of Springfield's workers lived in unincorporated areas of Lane County and 21% lived outside of Lane County.

Figure B-4. Places where workers in Springfield lived, 2004



Source: U.S. Census Bureau: LED on the Map

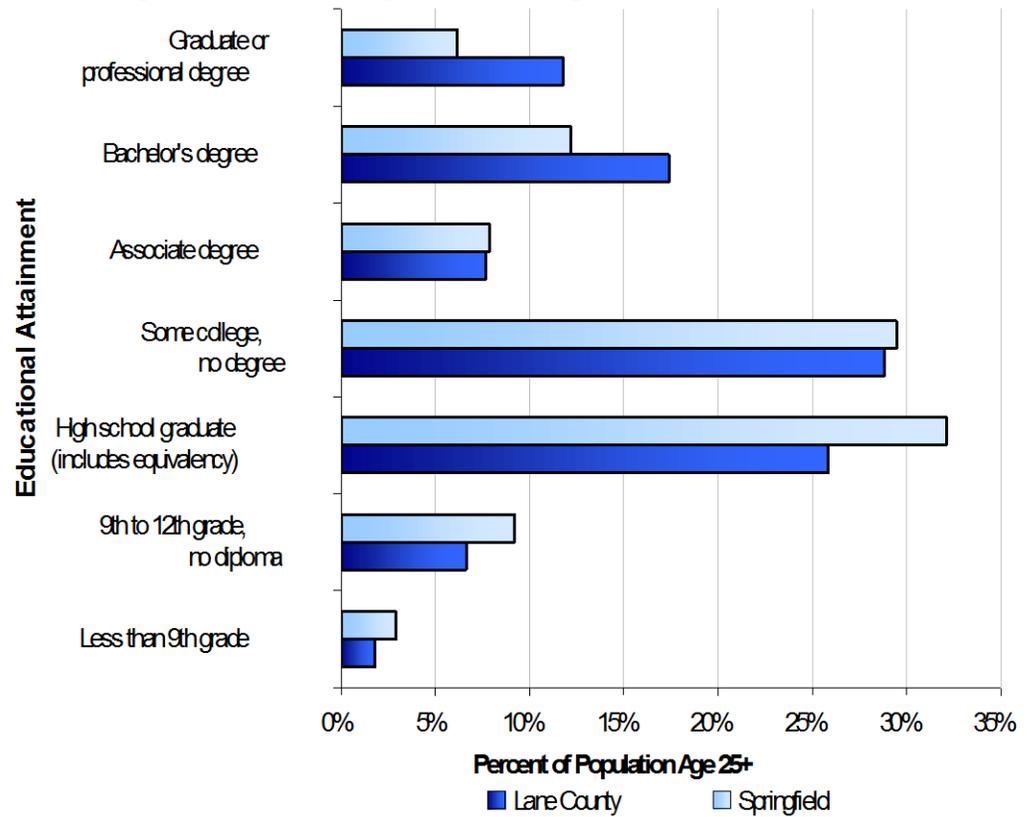
Table B-5. Places where workers in Springfield lived, 2004

Location	Number	Percent
Lane County	15,341	79%
Springfield	5,675	29%
Eugene	4,565	23%
All Other Locations	4,112	21%
Linn County	537	3%
Marion County	428	2%
Jackson County	409	2%
Other locations	2,738	14%
Total	19,453	100%

Source: U.S. Census Bureau: LED on the Map

Educational attainment is an important labor force factor because firms need to be able to find educated workers. Figure B-5 shows the share of population by education level completed in Springfield and Lane County in 2007. In 2007, Springfield had a smaller share of residents with an associate’s degree or higher (26%) than residents of Lane County (37%). In comparison, 47% of Eugene’s residents have an associate’s degree or higher.

Figure B-5. Educational attainment for the population 25 years and over, Oregon, Lane County, and Springfield, 2007



Source: OregonProspector.com

Opportunities for workforce training and post-secondary education for residents of the Eugene-Springfield area include: the University of Oregon, Lane Community College, Northwest Christian College, and Gutenberg College.

Table B-6 shows changes in ethnicity Oregon, Lane County, and Springfield between 1990, 2000, and 2008. This table shows that the Springfield has a larger share of Hispanic or Latino residents than Lane County 2000, with 6.6% of residents in Springfield were Hispanic compared to the County average of 4.6%. Between 1990 and 2000, Springfield’s Hispanic and Latino population grew by 168% (2,176 people), compared with growth in the Hispanic and Latino population of 117% in Lane County and 144% in Oregon.

In 2008, Hispanic residents accounted for about 11% of Oregon’s population and 6% of Lane County’s population. Springfield’s Hispanic population grew by 95% between 2000 and 2008, more than twice the rate of growth for the County or State during the same period.

Table B-6. Changes in ethnicity, Oregon, Lane County, and Springfield, 1990, 2000, and 2008

	Oregon	Lane County	Springfield
1990			
Total Population	2,842,321	282,912	44,683
Hispanic or Latino	112,707	6,852	1,299
Percent Hispanic or Latino	4.0%	2.4%	2.9%
2000			
Total Population	3,421,399	322,959	52,729
Hispanic or Latino	275,314	14,874	3,475
Percent Hispanic or Latino	8.0%	4.6%	6.6%
2008			
Total Population	3,772,854	343,961	56,016
Hispanic or Latino	400,435	20,941	5,293
Percent Hispanic or Latino	10.6%	6.1%	9.4%
Change 1900-2000			
Hispanic or Latino	162,607	8,022	2,176
Percent Hispanic or Latino	144%	117%	168%
Change 2000-2008			
Hispanic or Latino	125,121	6,067	1,818
Percent Hispanic or Latino	45%	41%	52%

Source: U.S. Census 1990 and 2000, Claritas 2008

Commuting is common in Springfield. About 40% of the people who live in Springfield commute to Eugene for work. Less than one-third of Springfield's workers live in Springfield. The implication of this workforce analysis is that, while only one-third of Springfield's workforce lives within the City, Springfield are able to attract educated workers from most of Eugene and surrounding areas in Lane county.

It does not appear that workforce will be a constraint on employment growth in Springfield. Springfield should be able to continue to draw on residents of Eugene for workers, even if energy prices continue to rise but Springfield's ability to attract workers from outside of the Eugene-Springfield area may be negatively impacted by continued increases in energy prices.

Employment Forecast and Site Needs for Industrial and other Employment Uses

Appendix C

This appendix presents a detailed analysis of Springfield's site needs consistent with the requirements of OAR 660-009-0015(2) and of OAR 660-009-0025(1). This appendix includes an employment forecast and an analysis of site needs to accommodate industrial and other employment uses in Springfield for the 2010 to 2030 period. The information presented in this appendix is summarized in Chapter 4.

EMPLOYMENT FORECAST

To provide for an adequate supply of commercial and industrial sites consistent with plan policies, Springfield needs an estimate of the amount of commercial and industrial land that will be needed over the planning period. Goal 9 requires cities to identify "the number of sites by type reasonably expected to be needed to accommodate the expected employment growth based on the site characteristics typical of expected uses." The number of needed sites is dependent on the site requirements of employers. The estimate of land need is presented in the site needs analysis in the next section.

Demand for commercial and industrial land will be driven by the expansion and relocation of existing businesses and new businesses locating in Springfield. The level of this business expansion activity can be measured by employment growth in Springfield. This section presents a projection of future employment levels in Springfield for the purpose of estimating demand for commercial and industrial land.

The projection of employment has three major steps:

1. **Establish base employment for the projection.** We start with the estimate of covered employment in Springfield's UGB presented in Chapter 3. Covered employment does not include all workers, so we adjust covered employment to reflect total employment in Springfield.
2. **Project total employment.** The projection of total employment will be calculated using the safe harbor method suggested in OAR 660-024.

3. **Allocate employment.** This step involves allocating employment to different building types, based on similar requirements for built space.

EMPLOYMENT BASE FOR PROJECTION

To forecast employment growth in Springfield, we must start with a base of employment growth on which to forecast. Table C-1 shows ECO's estimate of total employment in the Springfield UGB in 2006. To develop the figures, ECO started with estimated covered employment in the Springfield UGB from confidential QCEW (Quarterly Census of Employment and Wages) data provided by the Oregon Employment Department.

Covered employment, however, does not include all workers in an economy. Most notably, covered employment does not include sole proprietors. Analysis of data shows that covered employment reported by the Oregon Employment Department for Lane County is only about 74% of total employment reported by the U.S. Department of Commerce. We made this comparison by sector for Lane County and used the resulting ratios to convert covered employment to total employment in Springfield.

Table C-1 shows Springfield had an estimated 36,706 employees within its UGB in 2006. This figure results in a population-to-employment ratio of 1.7 persons per employee. The statewide average is about 1.9 persons per employee.

Table C-1. Estimated total employment in the Springfield UGB by sector, 2006

Sector	Covered Employment		Estimated Total Employment
	Number	% of Total Emp.	
Agriculture, Forestry, Fishing, & Mining	282	73%	387
Construction	1,922	65%	2,973
Manufacturing	2,714	99%	2,750
Wholesale Trade	1,230	85%	1,446
Retail	3,632	79%	4,609
Transportation & Warehousing & Utilities	941	70%	1,349
Information	1,356	79%	1,710
Finance & Insurance	1,110	66%	1,673
Real Estate & Rental & Leasing	441	33%	1,341
Professional, Scientific, & Technical Services	576	52%	1,107
Management of Companies & Enterprises	343	97%	354
Admin. & Support & Waste Mgt Services	2,460	76%	3,239
Private Educational Services	109	38%	290
Health Care & Social Assistance	3,069	77%	4,008
Arts, Entertainment, & Recreation	321	41%	777
Accommodation & Food Services	2,453	91%	2,686
Other Services	816	48%	1,685
Government	3,535	82%	4,322
Total	27,310	74%	36,706

Source: 2005 covered employment from confidential Quarterly Census of Employment and Wage (QCEW) data provided by the Oregon Employment Department. Covered employment as a percent of total employment calculated by ECONorthwest using data for Lane County employment from the U.S. Department of Commerce, Bureau of Economic Analysis (total) and the Oregon Employment Department (covered).

The employment forecast covers the 2010 to 2030 period, requiring an estimate of total employment for Springfield in 2008. Between 2006 and 2008, Springfield has had one major change in employment, beyond expected employment growth: PeaceHealth has built a new regional medical center at RiverBend. PeaceHealth estimates that there will be approximately 3,400 new employees in Springfield in 2008 as a result of the hospital at RiverBend.

ECO estimates that Springfield has 37,733 employees in 2008, plus the 3,400 employees at RiverBend. The result is an employment base of 41,133 total employees in Springfield in 2008 for the planning period 2010-2030.

EMPLOYMENT PROJECTION

OAR 660-024-0040 (9) (a) (A) allows the City to determine employment land needs based on “The county or regional job growth rate provided in the most recent forecast published by the Oregon Employment Department.” Springfield is part of Region 5, which includes all of Lane County. Based on this safe harbor, employment in Springfield can be assumed to grow at 1.4% annually. Table C-2 shows the result of applying this growth rate to the total employment base of 41,133 in Springfield. Table C-2 shows that employment is forecast to grow by 13,440 employees (a 32% increase) between 2010 and 2030.

Table C-2. Forecast of employment growth in Springfield’s UGB, 2010–2040

Year	Total Employment
2008	41,133
2010	42,284
2030	55,724
2030	55,724
2031	56,498
2032	57,283
2033	58,079
2034	58,886
2035	59,704
2036	60,534
2037	61,375
2038	62,228
2039	63,093
2040	63,970
Change 2010 to 2030	
Employees	13,440
Percent	32%
AAGR	1.4%

Source: ECONorthwest

Springfield is part of the regional economic center in the Eugene-Springfield region. The ratio of population to employment will decrease from 1.6 to 1.5 people per job between 2010 and 2030. This change shows that employment will grow faster than population in Springfield, suggesting that some Springfield will continue to have employees who commute from Eugene or other cities in the region.

ALLOCATE EMPLOYMENT TO DIFFERENT BUILDING TYPES

The next step in the employment forecast is to allocate future employment to building type, as described in Table A-8 in Appendix A. The allocation was done by grouping employment into building types with similar building and site requirements. For example, the following service sectors were grouped together into the “office” building type because they need similar types of built space with similar site requirements: information, finance, real estate, professional services, management of companies, administrative support, utilities, arts and entertainment, and other services.

Table C-3 shows the forecast of employment growth by building type in Springfield’s UGB in 2030. Table C-3 shows the amount of employment by building type in 2010. In 2010, a total of about 60% of Springfield’s employment is in office and other services’ building types. About 18% is in retail, 15% is in general industrial and 7% is in warehousing and distribution.

Table C-3. Forecast of employment growth in by building type, Springfield UGB, 2010–2030

Building Type	2010		2030		Change 2010 to 2030
	Employment	% of Total	Employment	% of Total	
Industrial					
Warehousing & Distribution	2,954	7.0%	3,343	6.0%	389
General Industrial	6,457	15.3%	7,523	13.5%	1,066
Commercial					
Office	12,561	29.7%	17,274	31.0%	4,713
Retail	7,709	18.2%	9,752	17.5%	2,043
Other Services	12,603	29.8%	17,832	32.0%	5,229
Total	42,284	100.0%	55,724	100.0%	13,440

Source: ECONorthwest

Note: Green shading denotes an assumption by ECONorthwest

The forecast in Table C-3 assumes that Springfield will have growth in all categories of employment. It also assumes that the share of employment will increase in other services (2.2% increase in share) and office (1.3% increase in share). At the same time, the share of employment will decrease in general industrial (1.8% decrease in share), warehousing and distribution (1.0% decrease in share), and retail (0.7% decrease in share). In terms of jobs, employment will increase in all of these sectors.

The assumptions about the changes in share of all employment are based on the following considerations:

- **Increase in the share of employment in office and other services.** Springfield's target industries are predominantly office and other services, such as medical services, services for seniors, call centers, back office functions, high tech, professional services, corporate headquarters, and other services. The forecast assumes that these industries will grow faster than other employment in Springfield.
- **Decrease in employment in other categories.** The decreases in employment in other categories is based on the following factors:
 - While Springfield expects that general industrial will grow, the City expects industrial employment will grow slower than all employment in the City. This expectation is based on the target industries that Springfield has identified and the Oregon Employment Department's forecast for employment growth in Lane County for 2006 to 2016.
 - Springfield expects that employment in warehousing and distribution will grow but slower than all employment because Springfield is at a disadvantage for siting warehouse and distribution firms. These firms need sites that have easy access to I-5 and flat sites of 20 or more acres. There are relatively few sites in or around Springfield that meet these criteria.
 - Employment in retail will grow with population. Springfield expects that retail will grow slightly slower than all employment. This assumption is based on the expectation that Springfield's target industries will grow faster than overall employment growth, including retail employment.

It is worth noting that the employment projections in this appendix do not take into account a major jump in employment that could result from the location of one or more large employers in the community during the planning period. This could take place if the City were successful in its recruitment efforts, either on its own and/or in conjunction with the Governors Initiative to bring new industry to the State. PeaceHealth and Symantec are examples of such events. Such a major change in the community's employment would essentially be over and above the growth anticipated by the City's employment forecast and the implied land needs (for employment, but also for housing, parks and other uses). Major economic events such as the successful recruitment of a very large employer are very difficult to include in a study of this nature. The implications, however, are relatively predictable: more demand for land (of all types) and public services.

If the City were successful in recruitment of a major business to the City, the land needed by such a business would be over and above the land need identified in this EOA. If the business needed a site larger than five acres, especially one larger than 20 acres, this growth may result in land deficiencies before 2030 and the City may need to reexamine whether there is enough land within the UGB to accommodate additional growth.

SITE NEEDS

OAR 660-009-0015(2) requires the EOA identify the number of sites, by type, reasonably expected to be needed for the 20-year planning period. Types of needed sites are based on the site characteristics typical of expected uses. The Goal 9 rule provides flexibility in how jurisdictions conduct and organize this analysis. For example, site types can be described by plan designation (i.e., heavy or light industrial), they can be described by general size categories that are defined locally (i.e., small, medium, or large sites), or can be identified by industry or use (i.e., manufacturing sites or distribution sites).

Firms wanting to expand or locate in Springfield will be looking for a variety of site and building characteristics, depending on the industry and specific circumstances. Previous research conducted by ECO has found that while there are always specific criteria that are industry-dependent and specific to a firm, many firms share at least a few common site criteria. In general, all firms need sites that are relatively flat, free of natural or regulatory constraints on development, with good transportation access and adequate public services. The exact amount, quality, and relative importance of these factors vary among different types of firms. This section discusses the site requirements for firms in industries with growth potential in the Eugene-Springfield Region, as indicated by the Oregon Employment Department forecast shown in Table A-12.

FACTORS THAT AFFECT LOCATIONAL DECISIONS

Why do firms locate where they do? There is no single answer – different firms choose their locations for different reasons. Key determinates of a location decision are a firm's *factors of production*. For example, a firm that spends a large portion of total costs on unskilled labor will be drawn to locations where labor is relatively inexpensive. A firm with large energy demands will give more weight to locations where energy is relatively inexpensive. In general, firms choose locations they believe will allow them to maximize net revenues: if demand for goods and services is held roughly constant, then revenue maximization is approximated by cost minimization.

The typical categories that economists use to describe a firm's production function are:

- **Labor.** Labor is often and increasingly the most important factor of production. Other things equal, firms look at productivity – labor output per dollar. Productivity can decrease if certain types of labor are in short supply, which increases the costs by requiring either more pay to acquire the labor that is available, the recruiting of labor from other areas, or the use of the less productive labor that is available locally. Based on existing commuting patterns, Springfield has access to labor from the Eugene-Springfield Region.
- **Land.** Demand for land depends on the type of firm. Manufacturing firms need more space and tend to prefer suburban locations where land is relatively less expensive and less difficult to develop. Warehousing and distribution firms need to locate close to interstate highways.
- **Local infrastructure.** An important role of government is to increase economic capacity by improving quality and efficiency of infrastructure and facilities, such as roads, bridges, water and sewer systems, airport and cargo facilities, energy systems, and telecommunications.
- **Access to markets.** Though part of infrastructure, transportation merits special attention. Firms need to move their product, either goods or services, to the market, and they rely on access to different modes of transportation to do this. Springfield's access to I-5 and Highway 126 provide the City with advantages in attracting businesses that need easy access to highways.
- **Materials.** Firms producing goods, and even firms producing services, need various materials to develop products that they can sell. Some firms need natural resources. For example, lumber manufacturing requires trees. Or, farther down the line, firms may need intermediate materials: for example, dimensioned lumber to build manufactured housing.
- **Entrepreneurship.** This input to production may be thought of as good management, or even more broadly as a spirit of innovation, optimism, and ambition that distinguishes one firm from another even though most of their other factor inputs may be quite similar.

The supply, cost, and quality of any of these factors depend on market factors: on conditions of supply and demand locally, nationally, and even

globally. But they also depend on public policy. In general, public policy can affect these factors of production through:

- **Regulation.** Regulations protect the health and safety of a community and help maintain the quality of life. Overly burdensome regulations, however, can be a disincentive for businesses to locate in a community. Simplified bureaucracies and straightforward regulations can reduce the burden on businesses and help them react quickly in a competitive marketplace.
- **Taxes.** Firms tend to seek locations where they can optimize their after-tax profits. Studies show that tax rates are not a primary location factor within a region – they matter only after businesses have made decisions based on labor, transportation, raw materials, and capital costs. The cost of these production factors is usually similar within a region. Therefore, differences in tax levels across communities within a region are more important in the location decision than are differences in tax levels between regions.
- **Financial incentives.** Governments can offer firms incentives to encourage growth. Studies have shown that most types of financial incentives have had little significant effect on firm location between regions. For manufacturing industries with significant equipment costs, however, property or investment tax credit or abatement incentives can play a significant role in location decisions. Incentives are more effective at redirecting growth within a region than they are at providing a competitive advantage between regions.

This discussion may suggest that a location decision is based entirely on a straight-forward accounting of costs, with the best location being the one with the lowest level of overall costs. Studies of economic development, however, have shown that location decisions depend on a variety of other factors that indirectly affect costs of production. These indirect factors include agglomerative economies (also known industry clusters), quality of life, and innovative capacity.

- **Industry clusters.** Firms with similar business activities can realize operational savings when they congregate in a single location or region. Clustering can reduce costs by creating economies of scale for suppliers. For this reason, firms tend to locate in areas where there is already a presence of other firms engaged in similar or related activities.

- **Quality of life.** A community that features many quality amenities, such as access to recreational opportunities, culture, low crime, good schools, affordable housing, and a clean environment can attract people simply because it is a nice place to be. A region's quality of life can attract skilled workers, and if the amenities lure enough potential workers to the region, the excess labor supply pushes their wages down so that firms in the region can find skilled labor for a relatively low cost. The characteristics of local communities can affect the distribution of economic development within a region, with different communities appealing to different types of workers and business owners. Sometimes location decisions by business owners are based on an emotional or historical attachment to a place or set of amenities, without much regard for the cost of other factors of production.
- **Innovative capacity.** Increasing evidence suggests that a culture promoting innovation, creativity, flexibility, and adaptability is essential to keeping U.S. cities economically vital and internationally competitive. Innovation is particularly important in industries that require an educated workforce. High-tech companies need to have access to new ideas typically associated with a university or research institute. Innovation affects both the overall level and type of economic development in a region. Government can be a key part of a community's innovative culture, through the provision of services and regulation of development and business activities that are responsive to the changing needs of business.

Table C-4 provides a summary of production factors in Springfield as well as comments received through the Technical Advisory and Stakeholder Advisory Committees and Citizen Involvement process on local opportunities and constraints. It also discusses implications of each factor for future economic development in Springfield.

Table C-4. Summary of production factors and their implications for Springfield

Category	Opportunities	Challenges	Implications
Labor	<ul style="list-style-type: none"> • Access to labor from the across the Eugene-Springfield Region 	<ul style="list-style-type: none"> • Existing workforce has lower educational attainment than regional averages • Potential difficulty in finding dependable labor for manufacturing jobs 	<p>The City has access to labor from the region. As the City adds more high-end housing stock, the City is likely to attract a more educated workforce.</p> <p>Commuting patterns may be negatively impacted by increases in energy prices. The impact is likely to be less in the immediate Eugene-Springfield area but is likely to be greater for commuters that live further from Eugene and Springfield.</p>
Land	<ul style="list-style-type: none"> • Opportunities for redevelopment and infill development, especially in Downtown and Glenwood 	<ul style="list-style-type: none"> • Lack of large parcels of land near highways • Cost of land • Short-term availability 	<p>Firms that prefer large, undeveloped parcels near highways are unlikely to locate in Springfield under current conditions, (e.g. manufacturers that require freight access).</p>
Local infrastructure	<ul style="list-style-type: none"> • Proximity to I-5 and Highway 126 and availability of freight shipping by rail • Opportunities for transportation via transit, bicycle, and pedestrian • Capacity of water and wastewater systems 	<ul style="list-style-type: none"> • Cost of providing infrastructure 	<p>Springfield has sufficient local infrastructure to attract and retain businesses.</p>
Access to markets	<ul style="list-style-type: none"> • Proximity to I-5 and Highway 126 and availability of freight shipping by rail • Proximity to Eugene Airport for transportation of people and small quantities of goods 	<ul style="list-style-type: none"> • Lack of sites with good transportation access, especially to I-5 	<p>Springfield's location relative to highway and rail transportation corridors is sufficient to attract firms that need access to markets via highways. Existing developed land uses are able to use the I-5 and rail freight corridors.</p> <p>The City lacks large sites that are well-located in relation to the I-5 corridor. At present, Springfield is relatively unlikely to attract firms that need close proximity to I-5. If the City had suitable sites for development near I-5, the city would be more likely to attract these firms.</p>

Category	Opportunities	Challenges	Implications
Materials	<ul style="list-style-type: none"> Proximity to natural resources (e.g., timber or agricultural products) Access to multiple rail lines 	<ul style="list-style-type: none"> Cost of shipping raw and finished products 	Springfield may be attractive to manufacturers that need access to natural resources. However, firms dependent on highway access to transport large quantities of materials may not locate in Springfield until infrastructure needs are addressed or the City adds suitable land with direct access to I-5.
Entrepreneurship	<ul style="list-style-type: none"> Proximity of the University of Oregon Quality of life 	<ul style="list-style-type: none"> Springfield's image as having a "blue collar" business environment. 	Springfield may be attractive to entrepreneurs who value the City's quality of life attributes, access to outdoor recreation, and other locational attributes. Springfield has opportunities to encourage entrepreneurship through continued improvement of the City's image and through attracting more professional jobs, such as the developing medical cluster.
Regulation	<ul style="list-style-type: none"> Pro-business attitudes among City officials and leaders Ability to craft regulations that are conducive to business 	<ul style="list-style-type: none"> High Systems Development Charges (SDCs) 	The City has the opportunity to develop a regulatory framework that can promote economic activity through economic development policies, plans for providing infrastructure, and provision of a variety of housing types.
Taxes	<ul style="list-style-type: none"> Property taxes are comparable to Eugene 		Springfield needs revenue sources for providing public services and infrastructure, just as other cities do. The City has options about how to raise these funds: through property taxes, development fees, and other fees to taxes.
Industry clusters	<ul style="list-style-type: none"> Presence of a developing medical cluster and existing call center cluster Opportunities for development of other clusters 	<ul style="list-style-type: none"> Availability of sites Transportation access Labor availability 	Springfield may be able to build employment in existing clusters, especially the developing medical cluster. Springfield has opportunities to develop other clusters, such as high-tech or small scale manufacturing.

Category	Opportunities	Challenges	Implications
Quality of life	<ul style="list-style-type: none"> High quality of life, including access to recreation, proximity to cultural amenities in Eugene, regional shopping opportunities and environmental quality 	<ul style="list-style-type: none"> Growth management challenges, such as balancing development with protection of environmental quality 	Springfield's policy choices will affect the City's quality of life, such as decisions regarding development of natural areas, housing policies, or policies that lead to redevelopment of downtown.
Innovative capacity	<ul style="list-style-type: none"> Educated regional workforce Existing professional and business service firms Proximity to the University of Oregon Existing businesses, clusters, and innovators in the Region 	<ul style="list-style-type: none"> Attracting and retaining good workers in the region Availability of higher-end housing and cultural amenities to attract creative class workers 	Government can be a key part of a community's innovative culture, through the provision of services and regulation of development and business activities that are responsive to the changing needs of business.

CHARACTERISTICS OF SITES NEEDED TO ACCOMMODATE EMPLOYMENT GROWTH

Table C-5 summarizes common site needs for target industries and key issues related to sites in Springfield.

Table C-5. Summary of site requirements

Site Attribute	Comments about these site attributes in Springfield
<p>Flat sites. Flat topography (slopes with grades less than 5% for industrial businesses and less than 15% for commercial businesses) is needed by almost all firms in every industry except for small Office and Commercial firms that could be accommodated in small structures built on sloped sites. Flat sites are particularly important for Industrial firms in manufacturing, trucking, and warehousing, since these firms strongly prefer to locate all of their production activity on one level with loading dock access for heavy trucks.</p>	<p>The commercial and industrial land inventory excluded lands with slopes over 15%. Some available sites in the Glenwood area have slopes that exceed 5% which may be inappropriate for some employment uses.</p>
<p>Parcel configuration and parking. Large Industrial and Commercial firms that require on-site parking or truck access are attracted to sites that offer adequate flexibility in site circulation and building layout. Parking ratios of 0.5 to 2 spaces per 1,000 square feet for Industrial and 2 to 3 spaces per 1,000 square feet for Commercial are typical ratios for these firms. In general rectangular sites are preferred, with a parcel width of at least 200-feet and length that is at least two times the width for build-to-suit sites. Parcel width of at least 400 feet is desired for flexible industrial/business park developments and the largest Commercial users.</p>	<p>Parcel configuration and parking do not appear to be a constraining factor on vacant land with the city's existing land base.</p> <p>The parcel configuration and need for parking on some sites identified as potentially redevelopable make some sites unlikely to redevelop over the 20-year planning period, as described in Chapter 2.</p>
<p>Soil type. Soil stability and ground vibration characteristics are fairly important considerations for some highly specialized manufacturing processes, such as microchip fabrications. Otherwise soil types are not very important for Commercial, Office, or Industrial firms—provided that drainage is not a major issue.</p>	<p>Soils do not appear to be a constraining factor on most sites in Springfield. The City Code provides special development and engineering standards to protect wetlands, flood plains, riparian corridors, wildlife areas, steep slopes and other sensitive areas.</p>
<p>Road transportation. All firms are heavily dependent upon surface transportation for efficient movement of goods, customers, and workers. Access to an adequate highway and arterial roadway network is needed for all industries. Close proximity to a highway or arterial roadway is critical for firms that generate a large volume of truck or auto trips or for firms that rely on visibility from passing traffic to help generate business. This need for proximity explains much of the highway strip development prevalent in urban areas today.</p>	<p>Businesses in Springfield have access to I-5, Highway 126, Highway 99 (in Eugene), and Highway 58.</p> <p>The Gateway area is highly visible from I-5. Springfield also has a well-developed street network within the City. The City may need to work with large businesses to increase automotive capacity in newly developed areas or in areas where the intensity of employment uses increase substantially.</p>

Site Attribute	Comments about these site attributes in Springfield
<p>Rail transportation. Rail access can be very important to certain types of heavy industries. The region has good rail access to many industrial sites.</p>	<p>Springfield is served by multiple Union Pacific rail lines. There are two primary junctions in Springfield: (1) the Springfield Junction is located in the Glenwood area in Southwest Springfield and (2) the Mohawk Junction is near the city's southern boundary, near 25th St.</p>
<p>Air transportation. Proximity to air transportation is important for some firms engaged in manufacturing, finance, or business services.</p>	<p>Springfield is located 15 miles from the Eugene Airport.</p>
<p>Transit. Transit access is important for Springfield's target industries, especially those with many employees and customers and for businesses that employ and serve segments of the population without access to an automobile.</p>	<p>Springfield has access to transit through the Lane Transit District (LTD). There are multiple bus lines that run throughout Springfield and multiple buses that connect Springfield and Eugene. The first two lines of the EmX bus rapid transit system serves existing employment nodes in Glenwood, Downtown and RiverBend/Gateway. Additional Frequent Transit Network (FTN) routes are identified in the Regional Transportation Plan and are being planned for the Main Street Corridor.</p>
<p>Pedestrian and bicycle facilities. The ability for workers to access amenities and support services such as shopping, entertainment and recreation areas by foot or bike is increasingly important to employers, particularly those with high-wage professional jobs. The need for safe and efficient bicycle and pedestrian networks will prove their importance over time as support services and neighborhoods are developed adjacent to employment centers.</p>	<p>Springfield has pedestrian and bicycle facilities. Springfield last updated the City Bicycle Plan in 1998. The plan proposes expansion of bicycle facilities to improve bicycle connectivity throughout the City and to neighboring communities.</p> <p>People in Springfield are able to use bicycle facilities for commuting if they live and work in areas of the City that have bicycle infrastructure. Commuting via pedestrian facilities may be more limited to people who live near their work.</p> <p>Springfield's pedestrian and bicycle facilities can be used on conjunction with LTD buses to provide opportunities for alternative methods of commuting for people that live further from work.</p>
<p>Labor force. Firms are looking at reducing their workforce risk, that is, employers want to be assured of an adequate labor pool with the skills and qualities most attractive to that industry. Communities can address this concern with adequate education and training of its populace. Firms also review turnover rates, productivity levels, types and amount of skilled workers for their industry in the area, management recruitment, and other labor force issues in a potential site area.</p>	<p>Commuting patterns within Springfield suggest that businesses in Springfield have access to the workforce of the Eugene-Springfield Region.</p> <p>Firms in Springfield will need employees with a range of skills, from people with customer service skills to highly educated professionals. Some types of skills that employers may need include: management skills, technology, manufacturing (e.g., machinist or wood-working), a range of medical training, creative skills, and other skills or education. The educational and skill requirements of businesses in Springfield are likely to be similar to the needs of businesses throughout the Eugene-Springfield Region.</p>

Site Attribute	Comments about these site attributes in Springfield
<p>Amenities. According to the International Economic Development Council,⁷⁹ attracting and retaining skilled workers requires that firms seek out places offering a high quality of life that is vibrant and exciting for a wide range of people and lifestyles.</p>	<p>Springfield offers access to outdoor amenities. Many urban amenities are available in Springfield and Eugene.</p>
<p>Fiber optics and telephone. Most, if not all industries expect access to multiple phone lines, a full range of telecommunication services, and high-speed internet communications.</p>	<p>Springfield has access to high-speed telecommunications facilities.</p>
<p>Potable water. Potable water needs range from domestic levels to 1,000,000 gallons or more per day for some manufacturing firms. However, emerging technologies are allowing manufacturers to rely on recycled water with limited on-site water storage and filter treatment. The demand for water for fire suppression also varies widely.</p>	<p>Springfield has sufficient potable water to meet current and expected needs.</p>
<p>Power requirements. Electricity power requirements range from redundant (uninterrupted, multi-sourced supply) 115 kva to 230 kva. Average daily power demand (as measured in kilowatt hours) generally ranges from approximately 5,000 kwh for small business service operations to 30,000 kwh for very large manufacturing operations. The highest power requirements are associated with manufacturing firms, particularly fabricated metal and electronics. For comparison, the typical household requires 2,500 kwh per day.</p>	<p>Springfield has access to sufficient power supply to accommodate most commercial and industrial users.</p>
<p>Land use buffers. According to the public officials and developers/brokers ECO has interviewed, industrial areas have operational characteristics that do not blend as well with residential land uses as they do with Office and Commercial areas. Generally, as the function of industrial use intensifies (e.g., heavy manufacturing) so too does the importance of buffering to mitigate impacts of noise, odors, traffic, and 24-hour 7-day week operations. Adequate buffers may consist of vegetation, landscaped swales, roadways, and public use parks/recreation areas. Depending upon the industrial use and site topography, site buffers range from approximately 50 to 100 feet. Selected commercial office, retail, lodging and mixed use (e.g., apartments or office over retail) activities are becoming acceptable adjacent uses to some light industrial areas.</p>	<p>Springfield's employment sites are generally located in areas where employment is compatible with other development. In areas where employment is not directly compatible with adjacent uses, the City may require buffers between incompatible uses.</p>

⁷⁹ International Economic Development Council. "Economic Development Reference Guide," <http://www.iedconline.org/hotlinks/SiteSel.html>. 10/25/02.

Table C-6 through Table C-11 present information from a range of sources about site needs of businesses that either considered locating in Oregon (including in the Eugene-Springfield area) or are in Springfield's target industries. The examples of site needs of these businesses illustrate that businesses have a wide range of need for site size, location, and characteristics based on the business's individual operational needs. The site needs of businesses vary from business to business, even within the same industry. As a result, one business's site needs may be different and potentially even conflicting with another business's site needs.

One of the key factors that businesses consider when making decisions about where to locate is the availability of vacant, large, and flat parcels of land. Table C-6 shows examples of traded-sector firms that considered locating in Oregon and Southern Washington between 1997 and 2010. Table C-6 shows that firms looking for office or flex space⁸⁰ required sites from 30 acres up to more than 100 acres. Warehouse and distribution firms looked for sites between about 50 and 200 acres. Manufacturing firms required sites from 25 acres to 250 acres in size.

These firms worked with Business Oregon to find suitable sites in Oregon. Some of the firms chose to locate in Oregon and some chose to locate elsewhere. One of the factors that influenced decisions to locate elsewhere was availability of large parcels of land with infrastructure services (e.g., transportation access, wastewater, etc.).

⁸⁰ Flex space is buildings that could be used for light industrial, office space, or both. Flex space typically has less costly finishing and improvements, such as having bare concrete floors rather than carpet. Businesses that sometimes occupy flex space include plumbing or electrical contractors, computer technology companies such as internet service providers or some software businesses, or service firms that prefer a more "industrial" feeling to their office space, such as some architecture firms.

Table C-6. Examples of firms that considered locating in Oregon and Southern Washington between 1997 and 2010

Type of business	General Location Considered	Site size (acres)	Building Size (square feet)	Located in Oregon ?
Office or Flex space				
Private technology firm	Northern Oregon I-5	100+	1 msf	
Facebook Data Center	Prineville	118	147,000 sf	Yes
Siltronics	Portland Harbor	35		
Nautilus	Vancouver	35	489,000	Yes
Google Data Center	The Dalles	30		Yes
Warehouse and Distribution				
Lowe's	Lebanon	204	1.3 to 2.2 msf	Yes
NOAH-PepsiCo	Albany	204	2.5 msf	No
Wal-Mart	Hermiston	200	1.3 msf	Yes
Target	Albany	175	1.3 msf	Yes
Fed Ex	Troutdale	78	500,000 sf	Yes
Dollar-Tree	Ridgefield, Wa	75	800,000 sf	
Home Depot	Salem	50 to 100	400,000+	Yes
Manufacturing				
Apricus	Northern Oregon	250	Very large	No
Navitas	Oregon	150 to 200		No
Pacific Ethanol	Boardman	137		Yes
SolarWorld	Hillsboro	75	1 msf	Yes
Schott Solar	I-5 corridor	50+	up to 800,000 sf	No
Genentech	Hillsboro	50	500,000 sf	Yes
Amy's Kitchen	White City	50		Yes
Sanyo Solar	Salem	25	150,000 sf	Yes
Spectrawatt	Hillsboro	25	225,000 sf	No

Source: Business Oregon

Table C-7 provides examples of businesses that considered locating in the Eugene-Springfield area between 2008 and 2013. These businesses all required sites at least 10 acres in size.

Table C-7. Examples of manufacturing and other businesses that considered locating in the Eugene-Springfield area between 2008 and 2013

Industry	Site size	Other information about site needs	Est. number of jobs	Year
Life science and biopharmaceutical manufacturing	60 acres	400,000 sq. ft. building Rectangular configuration and flat topography Avoid proximity to heavy industry, < 5 miles to highway	1,000	
Solar module manufacturing	10 to 20 acres	Existing bldg. 210,000 sq ft	434	2013
Manufacturing	15 to 25 acres and proximity to 40-100 acre site for expansion	120,000 sq. ft. building + 150,000 support space Flat and rectangular site configuration Close proximity to highway	150-200 up to 2,000	2008
MIT Solar Grade Silicon	30-40 acres		350	2008
Manufacturing	200 to 400 acres		347	2013
Manufacture and assembly of solar energy chemicals	65 acres	Build new	300	2009
Food processing and distribution	Needs at least 30 acres + more for expansion	300,000 sq. ft. w potential to expand Rectangular configuration Within 10 miles of highway Prefer a business park with compatible industries, buffered from commercial and residential areas, aesthetics of site important, visibility not required	215	2013
Manufacturing	25 acres	350-400,000 sq. ft. w/ 25 acres	135	2013
Lithium- ion batteries manufacturing	10 to 12 acres	200-300,000 sq. ft	124 up to 350	2009
High tech manufacturing		50,00 sq. ft. bldg. w outside storage	80-100	2013
Musical instrument manufacturer		100,000 sq. ft. bldg. with highway access	50 up to 350	2013
Chemical and plastic manufacturing	20 to 25 acres	Rectangular shaped site	50	2013
Data Center	20 acres or more	200,000-400,000 sq. ft. bldg.	25	2013
Aquaculture	10 to 25 acres	Two water sources	25	2013
Manufacturing	15 to 20 acres	Access to rail		2013
Food processing and warehouse		80-100,000 sq. ft. manufacturing facility 150-200,000 Sq. ft. warehouse Pref rail access		

Source: City of Springfield based on information from Business Oregon, Lane Metro Partnerships, and City of Springfield business contacts

Tables C-6 and C-7 provide examples of businesses that considered locating in Oregon and in Springfield. Business Oregon is the State agency that recruits businesses to Oregon, including the Eugene-Springfield area. Table C-8 presents information from Business Oregon about the characteristics that businesses similar to Springfield's target industries are seeking on employment sites larger than 10 acres. The matrix describes the site characteristics necessary to make a site competitive for by the industries shown in Table C-8, including site sizes that would meet selection requirements of the majority of industries in the listed industry sectors.

Table C-8. Industrial Development Competitiveness Matrix

Industry Sector	Site size* (Acres)	Site topography (Slope)	Site Access Max distance in miles to interstate or major arterial	Utilities (Min. line size in inches) Water / Sanitary Sewer	Special Considerations
Regionally to Nationally Scaled Clean-Tech Manufacturer	50	0-5%	10	10 / 10	Acreage allotment includes Expansion space (often an exercisable option). Very high utility volumes in one or more areas common. Sensitive to nearby uses.
Globally Scaled Clean Technology Campus	100	0-5%	10	10 / 10	Demanding criteria-driven site selection. High material and visitor throughput. Major Commercial Airport a must. Redundancy in trip routes and utilities vital. Surrounding Environmental (vibration, noise, etc.) Buffering and expansion space necessary. Sensitive to encroachment activities of nearby uses (residential, institutional, commercial).
Heavy Industrial/ Manufacturing	25	0-5%	10	8 / 8	Adequate distance from sensitive land uses (residential, parks, large retail centers) necessary. High throughput of materials. Large yard spaces and/or buffering required. Often transportation related requiring marine/rail links.
General Manufacturing	10	0-5%	20	8 / 8	Adequate distance from sensitive land uses(residential, parks) necessary.
Food Processing	20	0-5%	30	10 / 10	May require high volume/supply of water and sanitary sewer treatment. Often needs substantial storage/yard space for input storage. On-site water pretreatment needed in many instances.
High-tech Manufacturing or Campus Industrial	25	0-7%	15	10 / 10	Surrounding environment of great concern (vibration, noise, air quality, etc.). Increased setbacks may be required and/or on-site utility service areas. Avoid sites close to wastewater treatment plants, landfills, sewage lagoons, and other such land uses. May require high volume/supply of water and sanitary sewer treatment.
Regional (multistate) Distribution Center	200	0-5%	5 Only Interstate highway or equivalent	4 / 4	Transportation routing and proximity to/from major highways is crucial. Expansion options required. Truck staging requirements mandatory. Does not like to site or have routing issues between site and interstate that have rail crossings, school zones, airport runways, or drawbridges
Warehouse/Distribution	25	0-5%	5 Only Interstate highway or equivalent	4 / 4	Transportation infrastructure such as roads and bridges to/from major highways is most competitive factor.

Source: Business Oregon

*Note: Site size is the competitive acreage that would meet the site selection requirements of the majority of industries in this sector.

Table C-9 and Table C-10 present analysis from excerpted from the “Industry Intelligence” report developed for the City of Springfield by Tadzo.⁸¹ The report provides information about the range of site size needs for some of Springfield’s target industries.

Table C-9 shows that Springfield’s manufacturing target industries generally need sites at least 10 acres for a 100,000 square foot building and need sites 45 to 60 acres for a 500,000 square foot building. These site sizes are consistent with the sizes of sites and buildings needed by manufacturing firms that considered locating in Springfield since 2008 (see Table C-7). These types of manufacturing uses are likely to locate in districts that allow light industrial and campus industrial uses, possibly mixing with large-scale office employment uses.

Table C-9. Manufacturing site needs, Springfield, selected target industries

	<i>Minimum Acreage Needs²</i>			Building Type	Building Layout	Comments
	100,000 s.f. bldg.	200,000 s.f. bldg.	500,000 s.f. bldg.			
Medical Equipment Mfg	10	20	50	Light Manufacturing	Rectangular	Acreage needed to account for storm water drainage; green space; employee parking and truck movement.
High Tech Electronics Mfg	9	18	45	Light Manufacturing	Rectangular	Acreage needed to account for storm water drainage; green space; employee parking and truck movement. High tech manufacturing is typically more automated, thus requiring less employee parking than food processing or other manufacturing.
Recreational Equipment	10	20	50	Light Manufacturing	Rectangular or Square	Acreage needed to account for storm water drainage; green space; employee parking and truck movement. Early-stage operations for start-up operations are often housed in square building layouts and advance to more automated assembly lines as the company grows in product offerings and technology. Currently there is a growing trend for reshoring of recreational equipment manufacturing to boast USA branding. Also wages in China and India are steadily rising so the cost advantages are reducing.
Wood Furniture	12	24	60	Light Manufacturing	Rectangular or Square	The wood furniture manufacturing process is often completed in pods due to craftsman nature of operations versus large assembly lines. Outside storage of input goods is a typical siting criterion that contributes to larger acreage demands. Finished goods are typically large, requiring larger warehouse space as part of the operations.
Specialty Food Processing	10	20	50	Food Grade Mfg	Rectangular	Acreage needed to account for buffer from other operations is critical for protecting food quality. Acreage needed also encompasses storm water drainage; green space; waste water pre-treatment operations; parking and truck movement. Additionally, food processors typically desire extra acreage to plan for expansions adjacent to facility.

Source: “Industry Intelligence” report developed for the City of Springfield by Tadzo, November 21, 2014

⁸¹ Tadzo is a Washington State-based firm that specializes in economic development and site selection.

Table C-10 shows that target industries in office sectors need sites less than 5 acres for a building of 50,000 square foot or less. Larger office site needs range from about 10 acres for a 100,000 square foot building to 20 or more acres for a 200,000 square foot building. Office uses on sites larger than 10 acres are likely to occur in a range of zones, including commercial, mixed use, or a mixed employment zone (with compatible light industrial uses).

Table C-10. Office site needs, Springfield, selected target industries

	<i>Minimum Acreage Needs</i>				Building Type	Building Layout	Comments
	20,000 s.f. bldg.	50,000 s.f. bldg.	100,000 s.f. bldg.	200,000 s.f. bldg.			
Back Office	2-3	4-6	8-12	16-24	Urban Office ≤ 50,000 s.f. building	Single story	Typical urban office setting is utilized for back office operation via reuse of retail facilities that offer one-story building with open floor plan. Campus style office will be important for larger operations and more prestigious companies.
					Campus Style Office ≥ 50,000 s.f. building		Acreage needed to account for storm water drainage; green space; and employee parking. Employee density can be high so employee parking can be much higher than other office operations.
Headquarters	2	5	10	20	Urban Office ≤ 50,000 s.f. building	1 to 4 story buildings typical for Oregon outside of Portland.	Urban office may be adequate for small headquarter operations. Significant North American headquarters as well as major corporate headquarters will likely prefer campus style office with integrated amenities on-site.
					Campus Style Office ≥ 50,000 s.f. building	Urban office space could be part of mixed-used development.	Acreage needed to account for storm water drainage; green space; and employee parking. Extensive green space that integrates the natural environment into building design is typically important for these operations, along with employee amenities for outside experiences such as trails/walking paths and break areas.
Professional/ Technical Services	2	5	10	20	Urban Office ≤ 50,000 s.f. building	1 to 4 story buildings typical for Oregon outside of Portland.	Urban office may be adequate although as campus style office develops, professional/technical services will want to locate in close proximity of customers.
					Suburban Multi-Tenant Office ≥ 50,000 s.f. office	Urban office space could be part of mixed-used development.	Acreage needed to account for storm water drainage; green space; and employee parking. Extensive green space that integrates the natural environment into building design is typically important for these operations, along with employee amenities for outside experiences such as trails/walking paths and break areas.

Source: "Industry Intelligence" report developed for the City of Springfield by Tadzo, November 21, 2014

Businesses in Springfield’s target industries may consider locating within a business or industrial park. Table C-11 shows examples of business park sites in the Portland Metro area. Business parks in the Portland area generally range in size from 25 acres to 75 or 100 acres in size.

Table C-11. Examples of business park sites, Portland Metro area

Business Park	Site Acres	Building Square Feet
AmberGlen Business Center	72	572,685
AmberGlen East and West	44	536,000
Beaverton Creek	56	512,852
Columbia Commerce Park	31	562,888
Cornell Oaks Corporate Center	107	684,000
Creekside Corporate Park	50	615,113
Kruse Woods Corporate Center	76	1,652,105
Lincoln Center	22	728,770
Nimbus Corporate Park	47	688,632
Oregon Business Park 1	36	782,294
Oregon Business Park 3	35	501,029
PacTrust Business Center	40	570,539
Pacific Business Park (South)	26	340,864
Pacific Corporate Center	56	601,542
Parkside Business Center	52	687,829
Southshore Corporate Park	312	1,630,000
Tualatin Business Center I and II	33	383,305
Wilsonville Business Center	30	710,000
Woodside Corporate Park	37	579,845

Source: Metro UGR, Appendix 5 Multi-tenant (business park)/Large lot analysis

In addition, the Portland Metro area has the following types of major employment sites, which range from 25 to more than 500 acres.⁸² These provide examples of site needs of employers located on sites larger than 25 acres of the type included in Springfield’s target industries.

- **General industrial.** The Portland region has 21 general industrial major employment sites, ranging in size from 25 acres to 164 acres and averaging 53 acres. Firms on these sites range from beverage manufacturing to manufacturers of construction products to specialty manufacturing.
- **Warehouse and distribution.** The Portland region has 15 warehouse and distribution major employment sites, ranging in size from 25 acres to 452 acres and averaging 74 acres. Firms on these sites range from wholesalers to general warehouse and distribution to company-specific distributors.

⁸² These examples are documented in the Portland Metro 2009-2030 Urban Growth Report, Appendix 4

- **Flex.** The Portland region has 14 flex major employment sites, ranging in size from 25 acres to 522 acres and averaging 112 acres. Firms on these sites include small and large semiconductor manufacturing and other high tech manufacturing.
- **Office.** The Portland region has three office major employment sites, ranging in size from 44 acres to 123 acres and averaging 82 acres. Firms on these sites are generally high-tech businesses.
- **Institutional.** The Portland region has six medical major employment sites, ranging in size from 31 acres to 75 acres and averaging 54 acres.

LONG-TERM LAND AND SITE NEEDS

Table C-3, presented earlier in this appendix, discusses Springfield's forecast for employment by building type. The analysis of long-term site needs in Springfield builds off of the employment forecast for Springfield. Consistent with the requirements of OAR 660-009-0015(2), the site needs analysis presented in this section identifies the number of sites by broad category of site type and size reasonably expected to be needed for the 20-year planning period.

The steps to get from the employment forecast in Table C-3 to an estimate of needed sites are:

1. Determine the amount of employment that can be accommodated in non-employment plan designations based on historical development patterns and market trends. (See Table C-12)
2. Allocate new employment requiring land in employment designations⁸³ to sites ranging in size from less than 1 acre to greater than 20 acres. This allocation is based on historic employment patterns, discussed in Appendix A. (See Table C-13 and Table C-14)
3. Estimate the number of sites needed based on the employment forecast, historic development patterns, and infill and redevelopment potential. (See Table C-15)
4. Estimate the needed sites by site size and building type, using the range of sites identified in the previous step. (See Table C-16)

The remainder of this section is organized based on these steps.

⁸³ Not all new employment will require additional land in employment plan designations. Some employment growth will occur on land not designated for employment use (e.g., employment in residential and residential mixed use plan designations) and some employment growth will not require new commercial or industrial built space or land (e.g., new employment accommodated in existing built space).

Step 1: Determine amount of employment that can be accommodated in non-employment plan designations.

In 2006, approximately 16% of Springfield's employment was located in non-employment (predominantly residential) plan designations. Of this employment in non-employment plan designations, 2% was employment in industrial employment categories (such as a construction business run from a residence) and 14% was in commercial employment categories (such as neighborhood retail, doctor's offices, or home-based employment). Table A-9 and Map A-1 show the location of existing employment in Springfield.

Employment that does not require vacant land

Some employment will not require new land for development, including:

- 14% (1,918 employees) will locate on land designated for other uses (i.e., residential uses)
- 10% (1,344 new employees) will locate in existing built space

We assumed that a similar percentage of commercial employment (14% of new employment) would continue locating in non-employment designations. This assumption is reasonable because Springfield's plans call for integration of selected commercial uses in residential neighborhoods. In addition, telecommuting and working from home full-time is becoming more common and is likely to become more widely accepted over the next 20 years. We did not assume that additional industrial employment would locate in non-employment designations because these uses are relatively uncommon and Springfield's development policies do not actively encourage location of industrial employment in residential neighborhoods.

Table C-12 shows employment growth by the employment location. Table C-12 makes two assumptions that decrease land needed for new employment:

- **Some commercial employment growth will occur on land not designated for employment use.** Currently, 14% of commercial employment occurs within non-employment zones, predominantly in residential zones. These types of employment uses generally include neighborhood markets, medical offices, small restaurants, and home offices. ECO assumes that this trend will continue based on Springfield's development policies and the increasing acceptance of telecommuting and working from home.
- **Some employment growth will not require new commercial or industrial built space or land.** Some employment growth will be accommodated on existing developed or redeveloped land, such as a business occupying a vacant building or when an existing firm adds employees without expanding space.

Between 2003 and 2009, vacancy rates of commercial and

industrial buildings in the Eugene-Springfield region varied from a vacancy rate of about 1% (in 2006) to about 7% (in 2009). Vacancy rates in Springfield were generally similar, except that Springfield had a higher vacancy rate for industrial buildings (about 8%) between 2003 and 2005.^{84 85}

This analysis only accounts for vacant space in buildings and does not account for businesses adding employees to an existing space, such as adding a new desk in an existing office without expansion. Although space per employee fluctuates with changes in the economy because it is easier to layoff employees than to downsize office space, the amount of space allocated to office employees has been shrinking since 2000, when the national average amount of space per employee was about 200 square feet. By 2007 to 2009, the average space decreased to between 194 to 196 square feet per employee.⁸⁶

ECO assumed that employment would be accommodated in existing commercial and industrial space through filling vacant built space and through increases in efficient use of work space. ECO assumed that 10% of new employment will be accommodated in existing commercial or industrial built space, both through filling vacant built space and through increasing efficient use of existing work space.

Using these assumptions, Springfield will need to provide land for approximately 10,178 new employees between 2010 and 2030.

⁸⁴ This analysis is based on Co-Star data for the City of Springfield and the Eugene-Springfield region combined.

⁸⁵ During the recent recession, vacancy rates in the Eugene-Springfield region increased in 2009 and peaked around 7%, with industrial vacancy peaking at about 11%.

⁸⁶ This analysis is based on CoStar data and documented in an article on NAIOP, the Commercial Real Estate Development Association website. <http://www.naiop.org/en/Magazine/2015/Spring-2015/Business-Trends/Trends-in-Square-Feet-per-Office-Employee.aspx>

Table C-12. New employment locations, including employment locating in non-employment plan designations in existing built space, or on new land, Springfield, 2030

Type	New Employment	Employment Location		
		Non-employment designations	Existing Com. & Ind. Built Space	Employment on New Land
Industrial				
Warehousing & Distribution	389	0	39	350
General Industrial	1,066	0	107	959
Commercial				
Office	4,713	754	471	3,488
Retail	2,043	327	204	1,512
Other Services	5,229	837	523	3,869
Total	13,440	1,918	1,344	10,178

Source: ECONorthwest

Step 2. Allocate new employment requiring land in employment designations to sites by site size.

Determining Springfield's site needs requires distributing employment to a range of site sizes, ranging from small sites (less than 1 acre and 1 to 2 acre sites) to large sites (20 acres and larger). Table C-13 shows the distribution of employees by building type and site size in non-residential plan designations in Springfield in 2006. About 22% of Springfield's employment is on sites 5 to 20 acres, 21% is on sites of less than 1-acre, and 33% is on sites larger than 20 acres.

Table C-13. Percent of employees by building type and site sizes, Springfield, 2006

Building Type	Site Size (acres)					Total Employees
	Less than 1	1 to 2	2 to 5	5 to 20	20 and Larger	
Warehousing & Distribution	13%	6%	3%	63%	15%	100%
General Industrial	15%	17%	17%	18%	34%	100%
Office	28%	14%	15%	23%	20%	100%
Retail	29%	13%	11%	18%	28%	100%
Other Services	9%	4%	8%	5%	74%	100%
Total	21%	12%	12%	22%	33%	100%

Source: ECONorthwest based on QCEW data

Note: Total Employees may not add to 100% as a result of rounding.

The percent of employees by building type and site size was calculated based on the number of employees in each building type and site size categories using QCEW data and City of Springfield tax lot data.

Table C-14 distributes employees (shown in Table C-12) based on the historic distribution of employment by site size and building type shown in Table C-13. In other words, the analysis assumes that future employment will require similar site sizes as current firms. For example, 21% of employment will locate on sites less than 1 acre.

Table C-14. Forecast of growth employment by building type and site size, Springfield, 2010 to 2030

Building Type	Site Size (acres)					Total Employees
	Less than 1	1 to 2	2 to 5	5 to 20	20 and Larger	
Warehousing & Distribution	46	21	9	221	53	350
General Industrial	141	161	167	168	322	959
Office	1,024	448	400	645	970	3,488
Retail	143	65	116	76	1,111	1,512
Other Services	817	451	460	869	1,271	3,869
Total	2,171	1,148	1,153	1,979	3,728	10,178

Source: ECONorthwest

Note: The number of employees by site size may not add to the total shown in Table C-14 as a result of rounding in the calculation of number of employees.

Step 3: Estimate the number of sites needed based on the employment forecast, historic development patterns, and infill and redevelopment potential.

Table C-15 shows the range of sites needed by site size and building type in Springfield in 2030. The table uses information the following information to determine the range of site needs:

- **Total employment** is employment by site size from Table C-14.
- **Average employees per firm** is based on analysis of the average number of employees per firm by site size in Springfield in 2006.
- **Needed sites based on historic employment patterns** estimates the number of sites needed by dividing the total employment by average number of employees per firm. This calculation provides an estimate of the number of sites needed based on historical data. Table C-15 does not take into account redevelopment potential of existing sites, which is addressed through analysis in the buildable lands inventory in Chapter 2.

Table C-15. Needed sites by site size and building type, Springfield, 2010 to 2030 *

	Site Size (acres)					Total
	Less than 1	1 to 2	2 to 5	5 to 20	20 and Larger	
Total Employment	2,171	1,148	1,153	1,979	3,728	10,178
Average Employees per Firm	12	30	39	101	908	
Needed Sites based on historic employment patterns	181	38	30	20	4	273

Source: ECONorthwest

*Note: Table C-15 calculates total number of needed sites by size and type and does not factor in number of needed sites that assumed to be provided through vacant land or on potentially redevelopable sites. Redevelopment potential of existing sites is addressed through analysis in the buildable lands inventory in Chapter 2, in Table 2-12.

Step 4: Estimate the needed sites by site size and building type, using the range of sites identified in the previous step.

Table C-16 presents an estimate of needed sites by site size and type of building. The results show that Springfield needs approximately 273 sites. Most sites are small, 2 acres or less. Springfield needs approximately 4 sites larger than 20 acres.

Table C-16. Estimated needed sites by site size and building type, Springfield, 2010 to 2030*

	Site Size (acres)					Total
	Less than 1	1 to 2	2 to 5	5 to 20	20 and Larger	
Warehousing & Distribution	2	2	3	4	1	12
General Industrial	5	5	4	8	2	24
Office	75	12	13	4	1	105
Retail	55	10	6	2		73
Other Services	44	9	4	2		59
Total	181	38	30	20	4	273

Source: ECONorthwest

*Note: Table C-16 calculates total number of needed sites by size and type and does not factor in number of needed sites that assumed to be provided through vacant land or on potentially redevelopable sites. Redevelopment potential of existing sites is addressed through analysis in the buildable lands inventory in Chapter 2, in Table 2-12.

The implication of Table C-16 is that Springfield will continue to need sites in a range of site sizes, consistent with the City's established development patterns. While much of Springfield's employment will locate on sites smaller than 5 acres, 22% of employment will locate in sites 5 to 20 acres and 33% of new employment will locate on sites 20 acres and larger.

The identified site needs shown in Table C-16 do not distinguish sites by comprehensive plan designation. This study assumes employment will continue to locate on land designated for industrial and other employment uses, as identified on Table 4-2.

Springfield Economic Development Objectives and Strategies

Appendix D

This appendix presents the memorandum that describes Springfield's Economic Development Objectives and Strategies.

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October 15, 2008

TO: Springfield City Council & Planning Commission
FROM: Bob Parker and Beth Goodman
SUBJECT: ECONOMIC DEVELOPMENT OBJECTIVES AND IMPLEMENTATION STRATEGIES

The City of Springfield is conducting a Commercial Industrial Buildable Land Needs analysis. Broadly, the project has three components: (1) a buildable lands inventory; (2) an economic opportunities analysis; and (3) an economic development strategy. All of these elements are required to comply with statewide planning Goal 9 and the Goal 9 rule (OAR 660-009). The economic development strategy builds from previous work by the City and will be used to guide development of land-use policies to implement the City's economic development vision.

Economic development policies may address a range of outcomes, from policies to attract firms or retain existing firms to policies to improve or maintain quality of life. The economic development strategy presented in this memorandum was developed in support of the EOA and is designed to meet the requirements of Goal 9. As a result, the economic development strategy focuses on land-use issues, without addressing broader economic development strategies such as labor force education that may also be a priority to the City and residents of Springfield.

The economic development strategy is the result of input from multiple sources:

- **City Council and Planning Commission.** At joint worksessions in June 2008, decisionmakers provided guidance on economic development objectives for Springfield.
- **Commercial Industrial Buildable Lands Stakeholder Committee.** The Stakeholder Committee provided input on the economic development objectives suggested by decisionmakers and suggested implementation strategies for each objective.
- **Community Development Survey.** The City administered an on-line survey about community development issues.
- **Visioning Workshops.** The City of Springfield held two community workshops to discuss community development issues.
- **Springfield Economic Development Plan.** The City of Springfield completed a draft Economic Development Plan, dated April 13, 2006. The Economic Development Plan addresses a range of economic development issues, including (but not limited to) land-use planning for economic growth.

ORGANIZATION OF THIS MEMORANDUM

The remainder of the memorandum is organized as follows:

- **Public Opinions about Economic Development Summarizes** selected results from the on-line community development survey and the public workshops.
- **Framework for Understanding Economic Development Policies and Actions** provides an overview of economic development issues and types of economic development policies and strategies that municipalities can adopt to achieve various economic development goals.
- **Economic Development Strategies and Implementation Steps** for Springfield presents objectives and strategies related to land-use to implement the City's economic development goals.
- **Appendix A: Metro Plan Economic Element** presents the economic goal, findings, objectives and policies from the Metro Plan to provide context about existing regional economic development policies.

PUBLIC OPINIONS ABOUT ECONOMIC DEVELOPMENT

While the analysis required to meet Goal 9 emphasizes market conditions and local productive factors as the primary determinant of potential economic growth, Oregon's Statewide Planning Goals also recognize a role for local governments and citizens to express their desire for the level and type of economic growth in their community. The desires of a city are formally stated in its adopted Comprehensive Plan, economic development plans, and refinement plans. Development of these plans always includes opportunities for public comment and plans are adopted by elected bodies, so these plans collectively represent the community economic development vision.

The 2004 Update of the Eugene-Springfield Metropolitan Area General Plan includes an economic element that articulates the region's economic goals and objectives (presented in Appendix A). The Metro Plan lists a single economic development goal:

Broaden, improve, and diversify the metropolitan economy while maintaining or enhancing the environment.

The range of views by individual citizens, however, is more diverse than the consensus represented in adopted plans. This project included two public workshops and an online survey to solicit citizen's views on economic opportunities in Springfield, issues affecting economic development, and potential policies to address these issues. This section summarizes the views expressed at the public workshop and in the online survey.

RESULTS OF THE ONLINE SURVEY

As a part of this project, ECONorthwest developed and implemented an online survey from April 4, 2008 through May 27, 2008. The intent of the survey was to collect anecdotal information on the opinions and preferences of survey respondents on a variety of community

development issues ranging from pace of growth to the importance of amenities and issues to opinions about broad economic development policies. Following is a summary of the key findings from the survey. The survey had 214 respondents, with 186 respondents completing the entire survey, nearly three-quarters of whom lived inside the Springfield Urban Growth Boundary (UGB).

- A majority of survey respondents (60%) think that Springfield is a better place to live than it was 10 years ago. Respondents identified a broad range of reasons. Some frequently mentioned reasons were new businesses, newer, more vibrant buildings, an improved downtown, and the EmX.
- About 66% of respondents felt the rate of growth was “about right,” while about 18% indicated it is “too fast.” The remaining 16% of respondents thought that growth was too slow (10%) or did not have an opinion (6%).
- About 76% of respondents felt that the city should “manage growth” as opposed to limited growth or pursuing faster rates of growth. About 78% of respondents thought that Springfield should manage growth by targeting specific types of employers.
- Respondents identified the following three land-use issues as the top problems in Springfield: (1) availability of family wage jobs; (2) development on steep slopes and in floodplains; and (3) availability of affordable housing.
- A majority of respondents felt that redevelopment is a high priority in Downtown (71%) and in Glenwood (63%).
- A majority of respondents support economic development policies that increase economic activity, including policies to recruit new businesses and retain existing businesses.
- About 85% of respondents supported policies to maintain Springfield’s existing environmental quality.

RESULTS OF PUBLIC WORKSHOP

The City of Springfield held two community workshops to discuss community development issues, one on May 20, 2008 and one on July 31, 2008. The intent of the workshops was to collect anecdotal information on the opinions and preferences about community issues. At the workshops, small groups formed to discuss issues of concern for developing Springfield’s economy. The City summarized the results of each group’s discussion. This section summarizes the themes discussed the workshops.

Table 1. Summary of input from the Springfield Economic Development Workshop

Category	Issues and themes
Jobs and the economy	<p>Attract businesses that provide stable, living or family wage jobs that provide benefits</p> <p>Recruit businesses that provide green or sustainable products</p> <p>Lower the costs of doing business in the City, such as system development charges and permitting fees</p> <p>Attract businesses to the City through the use of enterprise zones</p>
Sustainability and the environment	<p>Balance environmental protection and greenfield development</p> <p>Encourage green building practices for new development</p> <p>Capitalize on opportunities to increase walkability and bicycling</p>
Land use and zoning	<p>Balance the use of developing green-fields with redeveloping existing land and emphasizing infill</p> <p>Encourage more efficient land uses, including higher density development where appropriate</p> <p>Promote nodal development and mixed-use development, especially in downtown</p> <p>Provide opportunities for high quality development along the riverfront</p> <p>Reevaluate allowable uses, especially near schools</p> <p>Consider parking and transportation needs when planning for new uses, especially in downtown</p>
Redevelopment	<p>Focus on redevelopment in downtown and Glenwood.</p> <p>Revitalize downtown through redevelopment and rehabilitation of old buildings</p> <p>Promote re-use of vacant buildings in downtown</p> <p>Keep a historical perspective when considering redevelopment</p>

Source: Springfield economic development workshops, May 20, 2008 and July 31, 2008

FRAMEWORK FOR UNDERSTANDING ECONOMIC DEVELOPMENT POLICIES AND ACTIONS

A wide range of economic development policies and actions are available to cities that can affect the level and type of economic development in their community. To affect economic development, any policy or action must affect a factor of production that influence business locations and job growth. In brief, the factors that have the most impact on business locations and job growth are:

- Labor
- Land
- Local Infrastructure
- Access to markets and materials
- Agglomerative economies (clusters)
- Quality of life
- Entrepreneurship

The supply, cost, and quality of any of these factors obviously depend on national and global market forces that local government has no influence over. But they also depend on public policy, which can generally affect these factors of production through:

- Planning
- Regulation
- Provision of public services
- Taxes
- Incentives

The location decisions of businesses are primarily based on the availability and cost of labor, transportation, raw materials, and capital. The availability and cost of these production factors are usually similar within a region. Most economic development strategies available to local governments only indirectly affect the cost and quality of these primary location factors.

Local governments can most directly affect tax rates (within the bounds of Measures 5 and 50), the cost to businesses and quality of public services, and regulatory policies. Economists generally agree that these factors do affect economic development, but the effects on economic development are modest. Thus, most of the strategies available to local governments have only a modest affect on the level and type of economic development in the community.

Local governments in Oregon also play a central role in the provision of buildable land through inclusion in the Urban Growth Boundary, plan designation, zoning, and provision of public services. Obviously, businesses need buildable land to locate or expand in a community. Providing buildable land alone is not sufficient to guarantee economic development in a community—market conditions must create demand for this land, and local factors of production must be favorable for business activity. The provision of buildable land is one of the most direct ways that the City of Springfield can affect the level and type of economic development in the community.

POTENTIAL ECONOMIC DEVELOPMENT POLICIES AND ACTIONS

A broad range of policies and actions are available to cities in achieving local economic development objectives. The effectiveness of any individual tool or combination of tools depends on the specific objectives the municipality wants to achieve. In short, local strategies should be customized not only to meet locally defined objectives, but to recognize economic opportunities and limitations (as defined in the Economic Opportunity Analysis (EOA)). Positive outcomes are not guaranteed: even good programs can result in limited or modest results.

Table 2 identifies a range of potential economic development strategies that the City of Springfield could consider implementing. These strategies range from those closely associated with the basic functions of government (provision of buildable land and public services) to those sometimes viewed as outside the primary functions of government (such as financial incentives and business assistance). The actual policies and actions adopted by the City of Springfield will depend on the specific economic development issues and the role of the City in economic development in the community.

Table 2. Range of potential economic development strategies

Category/Policy	Description
Land Use	Policies regarding the amount and location of available land and allowed uses.
Provide adequate supply of land	Provide an adequate supply of development sites to accommodate anticipated employment growth with the public and private services, sizes, zoning, and other characteristics needed by firms likely to locate in Springfield.
Increase the efficiency of the permitting process and simplify city land-use policies	Take actions to reduce costs and time for development permits. Adopt development codes and land use plans that are clear and concise.
Public Services	Policies regarding the level and quality of public and private infrastructure and services.
Provide adequate infrastructure to support employment growth	Provide adequate public services (i.e. roads, transportation, water, and sewer) and take action to assure adequate private utilities (i.e. electricity and communications) are provided to existing businesses and development sites.
Focused public investment	Provide public and private infrastructure to identified development or redevelopment sites.
Communications infrastructure	Actions to provide high-speed communication infrastructure, such as developing a local fiber optic network.
Business Assistance	Policies to assist existing businesses and attract new businesses.
Business retention and growth	Targeted assistance to businesses facing financial difficulty or thinking of moving out of the community. Assistance would vary depending on a given business' problems and could range from business loans to upgrades in infrastructure to assistance in finding a new location within the community.
Recruitment and marketing	Establish a program to market the community as a location for business in general, and target relocating firms to diversify and strengthen the local economy. Take steps to provide readily available development sites, an efficient permitting process, well-trained workforce, and perception of high quality of life.
Development districts (enterprise zones, renewal districts, etc.)	Establish districts with tax abatements, loans, assist with infrastructure, reduced regulation, or other incentives available to businesses in the district that meet specified criteria and help achieve community goals.
Business clusters	Help develop business clusters through business recruitment and business retention policies. Encourage siting of businesses to provide shared services to the business clusters, including retail and commercial services.
Public/private partnerships	Make public land or facilities available, public lease commitment in proposed development, provide parking, and other support services.
Financial assistance	Tax abatement, waivers, loans, grants, and financing for firms meeting specified criteria. Can be targeted as desired to support goal such as recruitment, retention, expansion, family-wage jobs, or sustainable industry.
Business incubators	Help develop low-cost space for use by new and expanding firms with shared office services, access to equipment, networking opportunities, and business development information. Designate land for live-work opportunities.
Mentoring and advice	Provide low-cost mentors and advice for local small businesses in the area of management, marketing, accounting, financing, and other business skills.
Export promotion	Assist businesses in identifying and expanding into new products and export markets; represent local firms at trade shows and missions.

Category/Policy	Description
Workforce	Policies to improve the quality of the workforce available to local firms.
Job training	Create opportunities for training in general or implement training programs for specific jobs or specific population groups (i.e. dislocated workers).
Job access	Provide transit/shuttle service to bring workers to job sites.
Jobs/housing balance	Make land available for a variety of low-cost housing types for lower income households, ranging from single-family housing types to multifamily housing.
Other	
Regional collaboration	Coordinate economic development efforts with the County, the State, and local jurisdictions, utilities, and agencies so that clear and consistent policies are developed.
Quality of life	Maintain and enhance quality of life through good schools, cultural programs, recreational opportunities, adequate health care facilities, affordable housing, neighborhood protection, and environmental amenities.

Source: ECONorthwest.

ECONOMIC DEVELOPMENT STRATEGIES AND IMPLEMENTATION STEPS FOR SPRINGFIELD

The following economic development strategies for Springfield are based on five sources of information: (1) guidance on developing the strategies from the City Council and Planning Commission; (2) input from the Stakeholder Committee on the strategies and implementation steps; (3) public input on preferred types of growth and development strategies from the visioning survey and public workshops; (4) existing goals and strategies in the Economic Development Plan; and (5) the principles of economic development presented in the section above and Table 2.

Together these considerations suggest the following criteria and strategy for the City to support economic development in Springfield. The strategies and implementation steps suggested below are organized with objectives most related to land-use planning presented first. The objectives were proposed by Springfield's decisionmakers or through the Stakeholder group. The implementation strategies was developed by the Stakeholder group or taken from Springfield's draft Economic Development Plan.

Objective 1: Provide an adequate supply of sites of varying locations, configurations, and size, to accommodate industrial and other employment over the planning period.

The Economic Opportunities Analysis (EOA) identifies the size and characteristics of sites needed in Springfield for employment uses over the planning period. Using the site needs described in the EOA, the City should track employment land use trends and re-evaluate employment land needs in five to seven years. The City should always maintain an adequate supply of land for employment uses.

Suggested implementation steps:

- Provide land to meet the site characteristics and site sizes described in the EOA. These sites may include vacant, undeveloped land, partially developed sites with

potential for additional development through infill development, and redevelopable areas. The City can provide land in two ways: (1) increasing commercial and industrial land-use efficiency by promoting infill or redevelopment or (2) bringing new land into the urban growth boundary.

- Work with property owners and their representatives to ensure that prime development and redevelopment sites throughout the City and Urban Growth Boundary are known, aggregated, ready to develop, and marketed.
- Work with property owners and their representatives to ensure that prime development and redevelopment sites throughout the City and Urban Growth Boundary that are designated for employment use are preserved for future employment needs and are not subdivided or used for non-employment uses.
- Expand industrial site opportunities through rezoning and evaluating commercial, residential, and industrial land for the best economic return for the community through the process of Periodic Review of the Metro Plan, expanding the urban growth boundary, and other means (e.g., Transportation Growth Management Grants from the State of Oregon).
- Develop and implement a system to monitor the supply of commercial and industrial lands. This includes monitoring commercial and industrial development (through permits) as well as land consumption (e.g. development on vacant, or redevelopable lands).

Objective 2: Provide an adequate competitive short-term supply of suitable land to respond to economic development opportunities as they arise.

“Short-term supply” means suitable land that is ready for construction usually within one year of an application for a building permit or request for service extension. “Competitive Short-term Supply” means the short-term supply of land provides a range of site sizes and locations to accommodate the market needs of a variety of industrial and other employment uses.

Suggested implementation steps:

- Where possible, concentrate development on sites with existing infrastructure or on sites where infrastructure can be provided relatively easily and at a comparatively low cost.
- Work with the State to have sites certified as project-ready through the state’s certified Industrial Lands program.
- Track development of land in the short-term supply and replace developed land with undeveloped or redevelopable land with similar characteristics (e.g., location, size, topography, etc.) as the land that recently developed. The City may want to replenish the short-term supply of land on an annual basis or every two to three years.

Objective 3: Reserve sites over 20-acres for special developments and industries that require large sites.

There are comparatively few large sites relatively near to I-5 available for development in the Southern Willamette Valley and no sites with these characteristics in the Eugene-Springfield

area.¹ The City should preserve large sites, especially sites with access to I-5, to provide opportunities for development by industries that require large sites.

Suggested implementation steps:

- Designate land for industrial or business parks to provide opportunities for development of business clusters for related or complementary businesses.
- Develop policies that provide flexibility in the industrial or non-retail commercial use of land on large sites.

Objective 4: Provide adequate infrastructure efficiently and fairly.

Public infrastructure and services are a cornerstone of any economic development strategy. If roads, water, sewer, and other public facilities are unavailable or inadequate, industries will have little incentive to locate in a community.

Suggested implementation steps:

- Coordinate capital improvement planning with land use and transportation planning to coincide with the City's Economic Development Strategy.
- Target resources of the Systems Development Funds of infrastructure on sites that provide prime opportunities for employment uses as a result of location, site size, or other significant site characteristics.
- Ensure that public-private development agreements to recover costs are in effect prior to financing public improvements.
- Establish alternative funding mechanisms in addition to debt service that provide timely completion of 'connecting' public facilities (unpaved block of a street or missing sections of sewer line) with preferences to projects in existing neighborhoods and those fostering economic development.
- Efficiently use existing infrastructure by promoting development, infill, re-use, and redevelopment for commercial and industrial uses and developing strategies and incentives to stimulate private investment that overcome anticipated impacts or downturns in the local economy.
- Support development of citywide high-speed internet access and other telecommunications infrastructures.
- Provide information on infrastructure availability on a site-by-site basis so that developers are able to readily assess infrastructure availability on any given site.
- Assist with providing infrastructure through the use of Urban Renewal funding, where appropriate.

¹ According to Oregon Prospector, there are only nine sites in the Southern Willamette Valley with the following characteristics: 20 acres or larger, Project Certified, and within about five miles of I-5. The following counties have sites that match these characteristics: three sites in Marion County, one site in Benton County, two sites in Linn County, no sites in Lane County, and three sites in Douglas County.

- Assess lower systems development charges (SDCs) in redevelopment areas with the capacity to provide land for employment, especially for redevelopment of areas five acres and larger.

Objective 5: Encourage employers to locate in downtown Springfield, when appropriate.

The City has policies to encourage residential and commercial redevelopment in downtown. The redevelopment of downtown Springfield provides opportunities to both use land more efficiently and minimize the costs of providing infrastructure.

Suggested implementation steps:

- Support the continued revitalization of Springfield's Downtown
- Pursue policies to promote infill and redevelopment in downtown Springfield
- Provide the infrastructure and services that businesses need to operate in downtown Springfield
- Develop programs to promote investments in existing buildings to make downtown more attractive, such as the Urban Renewal program.
- Develop a marketing strategy to attract businesses to downtown Springfield, including providing low-cost assistance for businesses moving to downtown

Objective 6: Encourage redevelopment of Glenwood with a mixed use employment and housing center.

The City has policies to encourage residential and commercial redevelopment in Glenwood. Like redevelopment in downtown, redevelopment in Glenwood provides opportunities to both use land more efficiently and minimize the costs of providing infrastructure.

Suggested implementation steps:

- Redevelop and develop sites in Glenwood through key investments, special standards, and focused activity through the Springfield Economic Development Agency (SEDA), the Glenwood Urban Renewal Plan, the Glenwood Refinement Plan and the Riverfront Development Plan.
- Provide the infrastructure and services to necessary for development in Glenwood.
- Coordinate economic development in Glenwood with regional economic development agencies.
- Promote economic development in Glenwood through techniques, such as land assembly and cooperative development agreements, to assist developers with land assembly problems.

Objective 7: Redevelop brownfields as the opportunities for reuse arise.

Springfield has more than 20 brownfield sites that will require clean-up before the sites can be redeveloped. Springfield has about 20 to 50 more sites that may be brownfields if the sites were available for redevelopment. The cost of clean-up will vary, depending on the prior uses and type of contamination on the site.

Suggested implementation steps:

- Inventory existing brownfields in the Springfield UGB. The inventory should include information about the site and brownfield: site location and size, previous uses, pollution or contaminants, and other site characteristics.
- Develop policies that support redevelopment of brownfields. Opportunities to encourage brownfield redevelopment may include tax incentives, decreases or waiving development fees, or private-public partnerships for state or federal grant funding for brownfield redevelopment.
- Provide non-monetary assistance with clean-up and redevelopment of ‘brownfield’ commercial and industrial sites, including, for example, the possible sponsorship of applicable state and federal grants.

Objective 8: Encourage development of commercial businesses in close proximity with residential uses, where appropriate.

Mixing commercial and residential development is appropriate in some areas of Springfield. The City should encourage mixed used development that includes retail, office commercial, and multifamily housing in areas like downtown. In more residential neighborhoods, the City should consider mixing neighborhood retail or small-scale offices with residential uses.

Suggested implementation steps:

- Continue to support policies to encourage mixed-use development and nodal development in Springfield’s downtown, Glenwood, and mixed-use nodes identified in TransPlan.
- Support policies to mix small-scale commercial uses into existing and new residential neighborhoods where these uses are appropriate and acceptable to residents.
- Support the co-location of residential and commercial uses in existing buildings by providing financial assistance for necessary building upgrades to meet requirements in the City’s building code, such as improvements to meet seismic standards.
- Reduce systems development charges (SDCs) and other development costs to encourage redevelopment and commercial uses in residential areas, where appropriate.

Objective 9: Support and assist existing businesses in Springfield.

Springfield's existing businesses are important to the City's continuing economic well-being.

Suggested implementation steps:

- Develop and implement an outreach strategy to determine how the City can assist existing businesses. Opportunities for assistance may range from ensuring availability of on-street parking to providing assistance with the development process to forming public-private partnerships to promote Springfield businesses.
- Encourage self-help methods and programs for business districts such as the formation of business associations and special self-assessment districts for parking and economic improvement.
- Pursue special projects and grant applications that provide support to local business and industry.
- Support the co-location of residential and commercial uses in existing buildings by providing financial assistance for necessary building upgrades to meet requirements in the City's building code, such as improvements to meet seismic standards.
- Reduce systems development charges (SDCs) and other development costs to encourage redevelopment and commercial uses in residential areas, where appropriate.

Objective 10: Increase the potential for employment in one of the regional industry clusters.

The clusters include: Health Care, Communication Equipment, Information Technology (Software), Metals (Wholesalers), Processed Food and Beverage, Wood & Forest Products, and Transportation Equipment.

Suggested implementation steps:

- Provide the services, infrastructure, and land needed to attract these types of businesses, especially where it can increase connectivity between businesses.
- Designate land for industrial/technology/business parks to provide opportunities for development of business clusters for related or complementary businesses.
- Promote development of support businesses for business clusters, including specialized suppliers for the business cluster, restaurants, financial institutions, and other services.
- Promote further development of the health care cluster in the Gateway area by examining land-use policies in the area and, if necessary, modify the policies to promote development of medical and other employment that requires specific types of land.
- Promote development of high-tech businesses by continuing to target these businesses for recruitment and expansion in Springfield.

- Coordinate development of business clusters with other cities and economic development agencies in the Eugene-Springfield region but emphasize development of the business cluster in Springfield.

Objective 11: Increase the potential for convention- and tourist-related economic activities.

Tourism results in economic activity, especially in the service industries like retail, food services, and accommodations. For example, the direct economic benefit of lodging tax receipts from overnight accommodations to Springfield in 2007 was \$1.2 million. Springfield could increase tourism through building tourism-related facilities, such as a convention center, through growth of businesses that bring tourists to the City, and through increased marketing.

Suggested implementation steps:

- Assist with conference center development at a suitable site in Springfield with a goal of making it financially independent with self-sustaining operations.
- Encourage development of destination point projects (like the Springfield Museum Interpretive Center, Dorris Ranch Living History Farm and McKenzie River fishing and recreational activities) that draw visitors to the Springfield area from regional, national, and international areas.
- Ensure that the factors that are likely to attract visitors to Springfield, especially Springfield's environmental quality and natural beauty, are protected and enhanced.

Objective 12: Attract sustainable businesses and support sustainable development practices.

The City should foster the creation of a local, sustainable economy by partnering with other organizations to watch for opportunities and vulnerabilities, incubate and coordinate projects and facilitate dialogue, action and education within the community. The City should also work to reduce Springfield's exposure to global economic and social vulnerabilities that could result as fuel supplies cease to be abundant and inexpensive.

Suggested implementation steps:

- Define "sustainable businesses" and what business practices qualify as "sustainable."
- Promote and recruit businesses that produce sustainable products, have sustainable business practices, and/or have sustainable manufacturing processes.
- Support land use patterns that reduce transportation needs, promote walkability and provide easy access to services and transportation options.
- Rebate development fees for development projects that are certified as sustainable to nationally recognized standards (e.g., LEED buildings).
- Provide incentives for development that uses sustainable building materials or solutions (e.g., instead of using traditional asphalt, using permeable asphalt) or use of sustainable energy sources (e.g., solar or wind power).

- When developing policies that will impact land outside of the Springfield UGB, consider future agricultural needs and economic opportunities to protect agricultural lands for production of local food.

Objective 13: Recruit businesses that pay higher than average wages for the region.

Maintaining and creating high-wage jobs is important for the development of Springfield's economy. Economic development recruitment efforts the City engages in should target high-wage jobs.

Suggested implementation steps:

- Work with Lane Metro Partnership and other economic development organizations to target and recruit businesses: (1) with above average wages (as reported by the Oregon Employment Department), (2) other benefits such as health insurance, especially for part-time employees, and/or (3) that provide other benefits such as job advancement or ownership opportunities.
- Work with local agencies to meet workforce needs, such as: training and education, job advancement, or local expansion of businesses that are less subject to boom and bust cycles.
- Coordinate with community economic development organizations to develop a coherent and effective marketing program. Coordinate development of the strategy local and state economic development agencies.
- Use word-of-mouth to market Springfield to prospective businesses based on the City's reputation for: rapid processing of permits and applications, maintaining City agreements and commitments, minimizing surprises in the development process, and providing developers with certainty and flexibility in the development process. Depending on this type of marketing will require that the City strive to enhance and maintain the City's reputation for these attributes.

APPENDIX A: METRO PLAN ECONOMIC ELEMENT (2004)

This appendix is the Economic Element from the 2004 update of the Metropolitan Area General Plan. The purpose of this appendix is to provide context for the existing regional economic development policies.

In recent years, there has been a strong structural shift in the Eugene-Springfield metropolitan area's economy. This shift is characterized by four trends: (a) a decline in the lumber and wood products industry as a source of employment; (b) limited increase in employment in other manufacturing activities; (c) diversification of the non-manufacturing segments of the local economy, primarily in trade, services, finance, insurance, and real estate; and (d) the development of this metropolitan area as a regional trade and service center serving southern and eastern Oregon.

The decline in lumber and wood products and diversification of the non-manufacturing sectors are consistent with changes that are occurring in other portions of the state and throughout the nation as a result of rising real incomes and higher productivity of labor in manufacturing. The increase in employment in other manufacturing activities in this area has lagged behind other portions of the state, particularly the Portland area, and many other places in the nation. Given the projected growth in this area's economy, it is essential that an adequate supply (quantitatively and qualitatively) of commercial and industrial land be available. An adequate supply of land includes not only sites sufficient in size to accommodate the needs of the commercial or industrial operations (including expansion), but also includes sites which are attractive from the standpoint of esthetics, transportation costs, labor costs, availability of skilled labor, natural resource availability, proximity to markets, and anticipated growth of local markets.

In striving toward the Land Conservation and Development Commission's (LCDC) Statewide Planning Goal 9: Economic Development, "To provide adequate opportunities throughout the state for a variety of economic activities vital to the health, welfare, and prosperity of Oregon's citizens," the Eugene-Springfield metropolitan area must take advantage of and encourage the further diversification of this area's economic activities and role as a regional center.

This diversification and growth can improve the opportunities for presently underutilized human resources and generally raise the standard of living for metropolitan area residents.

Implicit in the goals and objectives that follow is the premise that the economic health of the area is integrally related to the quality of life for residents. Improved welfare of the residents of the metropolitan area, measured by increases in employment opportunities and reductions in unemployment, increases in real incomes, and improved environmental quality are the ultimate goals of all economic efforts. Economic growth or industrial expansion is acceptable when it is consistent with these goals and objectives.

ECONOMIC GOAL

Broaden, improve, and diversify the metropolitan economy while maintaining or enhancing the environment.

FINDINGS, OBJECTIVES, AND POLICIES

Findings

1. The structure of the Eugene-Springfield metropolitan area economy is undergoing a shift away from lumber and wood products manufacturing (and other heavy industrial activities) and towards a more diverse economic base characterized by growth in light manufacturing activities and the non-manufacturing activities of trade, commercial and professional services, finance, insurance, and real estate.
2. The lumber and wood products sector is the metropolitan area's dominant manufacturing activity; and in this respect, Lane County's forest is the area's most important natural resource utilized as a factor of production.
3. Major institutions in the metropolitan area including the University of Oregon and Sacred Heart Hospital, have had a stabilizing influence on the local economy.
4. The Eugene-Springfield metropolitan area is developing as a regional center for activities, such as tourism, distribution, and financial services, serving the southwestern and central Oregon area.
5. Based on data from the 2000 U.S. Census, the per capita income in 1999 for the Eugene- Springfield metropolitan area was lower than for Oregon as a whole and the Portland metropolitan area.
6. In 2000, the unemployment rate in the Eugene-Springfield metropolitan area was comparable to Oregon and higher than the national rate.
7. Historically, heavy-manufacturing industries, including primary metals, chemicals and paper, have been characterized by high levels of pollution or energy consumption. Changes in technology and environmental regulations have reduced the potential environmental impacts of these industries. Heavy manufacturing industries provide benefits, such as relatively high wage scales and the potential for generating secondary manufacturing activities.
8. Both expansion of existing businesses through use of local capital and entrepreneurial skills and the attraction of new employers offer realistic opportunities for economic development.
9. The healthful environment of the metropolitan area can help attract industrial development, hold workers, and attract convention- and tourist-related economic activities. The concern for clean air and water is high priority with area residents.
10. The provision of adequate public facilities and services is necessary for economic development.
11. There are presently inefficiently used resources in the metropolitan area, including land, labor, and secondary waste products.
12. Major employment areas include the Eugene and Springfield central business districts, the University of Oregon area, Sacred Heart Hospital, the west Eugene industrial area, the north (Gateway) and south Springfield industrial areas, the Highway 99N industrial area, Country Club Road, Chad Drive, and the Mohawk-Northgate area.
13. The metropolitan economy is made up of a number of interrelated and important elements, one of which is construction and construction-related activities. Construction, for example, is essential for all sectors of the economy, as well as for the provision of an adequate supply of affordable housing.
14. The mixture of commercial and office uses with industrial uses can reduce or enhance the utility of industrial areas for industrial purposes, depending upon circumstances.

- Uncontrolled mixing creates problems of compatibility and traffic congestion, and may limit the area available for industrial development. Limited mixing, subject to clear and objective criteria designed to minimize or eliminate incompatibility, traffic problems, and which preserve the area for its primary purpose, can make an industrial area more pleasant, convenient, economical, and attractive as a place to work or locate.
15. Campus industrial firms prefer city services.
 16. Campus industrial firms have varied site location requirements, prefer alternative sites to choose from, and usually benefit from location of other special light industrial firms within the community and within the same industrial development.

Objectives

1. Improve the level, stability, and distribution of per-capita income for metropolitan residents.
2. Reduce unemployment in the resident labor force, especially chronic long-term unemployment.
3. Encourage local residents to develop skills and other educational attributes that would enable them to obtain existing jobs.
4. Promote industrial and commercial development with local capital, entrepreneurial skills, and experience of the resident labor force, as well as with new light manufacturing companies from outside the metropolitan area.
5. Supply an adequate amount of land within the urban growth boundary to accommodate: (a) the diversifying manufacturing sector (especially low polluting, energy-efficient manufacturing uses); and (b) the expansion of the metropolitan area as a regional distribution, trade, and service center.
6. Maintain strong central business districts to provide for office-based commercial, governmental, and specialized or large-scale retail activities.
7. Ensure compatibility between industrial lands and adjacent areas.
8. Reserve enough remaining large parcels for special developments requiring large lots.
9. Increase the potential for convention- and tourist-related economic activities.
10. Provide the necessary public facilities and services to allow economic development.
11. Attempt to find ways to more effectively use inefficiently used resources such as land, labor, and secondary waste products.
12. Provide for limited mixing of office, commercial, and industrial uses subject to clear, objective criteria which: (a) do not materially reduce the suitability of industrial, office, or commercial areas for their primary use; (b) assure compatibility; and (c) consider the potential for increased traffic congestion.

Policies

- B.1 Demonstrate a positive interest in existing and new industries, especially those providing above average wage and salary levels, an increased variety of job opportunities, a rise in the standard of living, and utilization of our existing comparative advantage in the level of education and skill of the resident labor force.
- B.2 Encourage economic development, which utilizes local and imported capital, entrepreneurial skills, and the resident labor force.
- B.3 Encourage local residents to develop job skills and other educational attributes that will enable them to fill existing job opportunities.

- B.4 Encourage the continuance of career preparation and employment orientation for metropolitan area residents by the community's educational institutions, labor unions, businesses, and industry.
- B.5 Provide existing industrial activities sufficient adjacent land for future expansion. B.6 Increase the amount of undeveloped land zoned for light industrial and commercial uses correlating the effective supply in terms of suitability and availability with the projections of demand.
- B.7 Encourage industrial park development, including areas for warehousing and distributive industries and research and development activities.
- B.8 Encourage the improvement of the appearance of existing industrial areas, as well as their ability to serve the needs of existing and potential light industrial development.
- B.9 Encourage the expansion of existing and the location of new manufacturing activities, which are characterized by low levels of pollution and efficient energy use.
- B.10 Encourage opportunities for a variety of heavy industrial development in Oregon's second largest metropolitan area.
- B.11 Encourage economic activities, which strengthen the metropolitan area's position as a regional distribution, trade, health, and service center.
- B.12 Discourage future *Metro Plan* amendments that would change development-ready industrial lands (sites defined as short-term in the metropolitan *Industrial Lands Special Study*, 1991) to non-industrial designations.
- B.13 Continue to encourage the development of convention and tourist-related facilities.
- B.14 Continue efforts to keep the Eugene and Springfield central business districts as vital centers of the metropolitan area.
- B.15 Encourage compatibility between industrially zoned lands and adjacent areas in local planning programs.
- B.16 Utilize processes and local controls, which encourage retention of large parcels or consolidation of small parcels of industrially or commercially zoned land to facilitate their use or reuse in a comprehensive rather than piecemeal fashion.
- B.17 Improve land availability for industries dependent on rail access.
- B.18 Encourage the development of transportation facilities which would improve access to industrial and commercial areas and improve freight movement capabilities by implementing the policies and projects in the *Eugene-Springfield Metropolitan Area Transportation Plan (TransPlan)* and the *Eugene Airport Master Plan*.
- B.19 Local jurisdictions will encourage the allocation of funds to improve transportation access to key industrial sites or areas through capital budgets and priorities.
- B.20 Encourage research and development of products and markets resulting in more efficient use of underutilized, renewable, and nonrenewable resources, including wood waste, recyclable materials, and solar energy.
- B.21 Reserve several areas within the UGB for large-scale, campus-type, light manufacturing uses. (See *Metro Plan* Diagram for locations so designated.)
- B.22 Review local ordinances and revise them to promote greater flexibility for promoting appropriate commercial development in residential neighborhoods.
- B.23 Provide for limited mixing of office, commercial, and industrial uses under procedures which clearly define the conditions under which such uses shall be permitted and which: (a) preserve the suitability of the affected areas for their primary uses; (b) assure compatibility; and (c) consider the potential for increased traffic congestion.

- B.24 Continue to evaluate other sites in and around Springfield and Eugene for potential light-medium industrial and special light industrial uses, as well as potential residential uses.
- B.25 Pursue an aggressive annexation program and servicing of designated industrial lands in order to have a sufficient supply of “development ready” land.
- B.26 In order to provide locational choice and to attract new campus industrial firms to the metropolitan area, Eugene and Springfield shall place as a high priority service extension, annexation, and proper zoning of all designated special light industrial sites.
- B.27 Eugene, Springfield, and Lane County shall improve monitoring of economic development and trends and shall cooperate in studying and protecting other potential industrial lands outside the urban boundary.
- B.28 Recognize the vital role of neighborhood commercial facilities in providing services and goods to a particular neighborhood.
- B.29 Encourage the expansion or redevelopment of existing neighborhood commercial facilities as surrounding residential densities increase or as the characteristics of the support population change.
- B.30 Industrial land uses abutting the large aggregate extraction ponds north of High Banks Road in Springfield shall demonstrate that they require the location next to water to facilitate the manufacture of testing of products made on-site.

Ordinance _____, Exhibit C

Proposed amendments to Eugene-Springfield Metropolitan Area General Plan (Metro Plan) to adopt the Springfield 2030 Comprehensive Plan Urbanization Element as Springfield’s comprehensive plan in compliance with Statewide Planning Goal 14, Urbanization. The Urbanization Element contains Springfield’s city-specific goals, policies, implementation measures and findings to address land needs for the planning period 2010-2030, replacing *Metro Plan* Urbanization and Growth Management policies applicable to lands within Springfield’s jurisdictional area; Proposed amendments to the Springfield Urban Growth Boundary Map and Technical Supplement describing the amended UGB; and Proposed amendments to the Metro Plan Boundary to be coterminous with the UGB.

- C-1 Springfield 2030 Comprehensive Plan Urbanization Element and Springfield Urban Growth Boundary (UGB) Map
- C-2 UGB Technical Supplement

Metro Plan Amendment
Springfield Ordinance _____, Lane County Ordinance _____

SPRINGFIELD 2030 COMPREHENSIVE PLAN

URBANIZATION ELEMENT

Commentary: After approval of the Urbanization Element, the following section will be formatted and numbered to be consistent with 2030 Residential and Economic Elements that list policies and implementation strategies under the corresponding **2030 Plan Urbanization Goals**. For discussion purposes, policies are numbered and implementation strategies are bulleted. **Green font = 2030 Urbanization Element Planning Goals** **Blue font = Metro Plan policies carried over into the 2030 Plan.**

Commentary: The Springfield 2030 Comprehensive Plan (2030 Plan) is currently being developed as Springfield's new land use comprehensive plan policy document applicable to Springfield's jurisdictional area of the Metro Plan.

Oregon's statewide planning goals are achieved through local comprehensive planning. State law requires each city and county to have a comprehensive plan and the zoning and land-division ordinances needed to put the plan into effect. The local comprehensive plan guides a community's land use, conservation of natural resources, economic development, and public facilities, and must be consistent with statewide planning goals.

Comprehensive plans contain 1) sections of background, data, inventories and analysis — the factual base describing a community's resources and features; and 2) the policy "elements" of the plan setting forth the community's long-range objectives and the policies by which it intends to achieve them. The policy element of each community's plan is adopted by ordinance and has the force of law [Oregon Statewide Planning Goals, DLCD, March 12, 2010].

The 2030 Plan is Springfield's local comprehensive plan to demonstrate compliance with applicable Oregon Land Use Planning Statutes, Goals and Administrative Rules for the specific land use planning goals that it addresses. The City and Lane County are co-adopting separate chapters — called "elements" — of the 2030 Plan on an incremental basis to replace or refine existing policies in the Eugene-Springfield Metropolitan Area General Plan (Metro Plan). After local adoption and approval by the Oregon Land Conservation and Development Commission (LCDC), the 2030 Plan Elements become the "acknowledged" land use policies that control land use planning (including coordination of transportation and public facilities planning) for the area within the Springfield Urban Growth Boundary.

Springfield's Residential Land Use and Housing Element was acknowledged in 2011 to address Springfield's housing needs for the 2010-2030 planning period. The Economic and Urbanization Elements are being forwarded for adoption at this time to address employment and economic development land use needs and the urban transition process. Other elements of Metro Plan remain in effect for Springfield until they are replaced or otherwise addressed by local adoption of future Springfield 2030 Comprehensive Plan elements or other Metro plan changes initiated by Metro Plan partners. During this period of transition from Metro area to local plans, Springfield's "comprehensive plan" consists of the Metro Plan *and* the Elements of the Springfield 2030 Comprehensive Plan.

OVERVIEW

The Springfield 2030 Comprehensive Plan (2030 Plan) is currently being developed as Springfield's new land use comprehensive plan policy document applicable to Springfield's jurisdictional area of the Metro Plan. The Springfield Comprehensive Plan **Urbanization Element** is the chapter of the 2030 Plan that guides future development in Springfield by describing how and where land will be developed and infrastructure provided to meet long term growth needs while maintaining and improving community livability. The purpose of the **Urbanization Element** is to inform and guide long range land use and public facilities planning to address Springfield's land needs for the planning period 2010-2030 in compliance with Statewide Planning Goal 14, Urbanization.

Goal 14. Urbanization – To provide for an orderly and efficient transition from rural to urban land use, to accommodate population and urban employment inside urban growth boundaries, to ensure efficient use of land, and to provide for livable communities.

Oregon law requires urban growth boundaries to provide land for urban development needs and to identify and separate urban and urbanizable land from rural land. "Urban" lands are lands within the Urban Growth Boundary (UGB). "Urbanizable lands" are those lands that are within the UGB but have not yet been annexed to the City. Urbanizable lands are considered to be available for urban development consistent with plans for the provision of urban facilities and services. The City and Lane County are required to co-adopt comprehensive plan policies, zoning, and development code provisions to regulate land uses and land divisions of urbanizable lands to maintain their potential for planned urban development until adequate public facilities and services necessary for urban level of development are available or planned.

The **Urbanization Element** establishes the comprehensive plan policies and zoning applicable to urbanizable lands within Springfield's Urban Growth Boundary (UGB) that are necessary to efficiently and effectively plan and manage the land supply as land uses transition from rural to urban. This policy direction is based on the need to:

- Designate a 20-year supply of urbanizable land to accommodate population and employment growth.
- Allow and regulate interim land uses that do not impede future development of planned urban land uses and densities.

¹ Oregon's Statewide Planning Goals & Guidelines define "urbanizable land" as "Urban land that, due to the present unavailability of urban facilities and services, or for other reasons, either: (a) Retains the zone designations assigned prior to inclusion in the boundary, or (b) Is subject to interim zone designations intended to maintain the land's potential for planned urban development until appropriate public facilities and services are available or planned."

- Plan for the orderly and efficient extension of public facilities and services.
- Designate land for community open space and recreational needs.
- Designate land to provide and manage the public facilities and environmental services needed to serve Springfield’s urban area.
- Manage growth and improve community livability through increasingly efficient use of land consistent and compatible with the community’s needs, resources, opportunities and advantages within the broader Southern Willamette Valley region.

The policy direction provided by the **Urbanization Element** guides comprehensive planning coordination, zoning and land use regulation within the UGB, including:

- future refinement planning and zoning at the more detailed level of neighborhood, district (e.g. Gateway), or corridor;
- future regional and local transportation, infrastructure and capital improvement planning;
- future comprehensive plan, zoning and Springfield Development Code amendments;
- review of property owner-initiated land use proposals; and
- review of property owner-initiated land use applications including annexation requests.

SPRINGFIELD URBANIZATION PLANNING GOALS

The following **Urbanization Element** Planning Goals express the desired community development outcomes and benefits the City aspires to achieve by planning and managing land in new growth areas of the City.

UG-1 Promote compact, orderly and efficient urban development by guiding future growth to vacant sites and redevelopment areas within the established areas of the city, and to urbanizable lands where future annexation and development may occur.

UG-2 Promote efficient and economical patterns of mixed land uses and development densities that locate a variety of different life activities, such as employment, housing, shopping and recreation in convenient proximity; and where accessible by multiple modes of transportation — including walking, bicycling, and transit in addition to motor vehicles — within and between neighborhoods and districts.

UG-3 Provide adequate level of urban services, including but not limited to public water, wastewater, stormwater management systems, environmental services and an urban multi-modal transportation system as urban development occurs within the Springfield UGB.

UG-4 As the City grows and as land develops, maintain and reinforce Springfield’s identity as a river-oriented community by emphasizing and strengthening physical connections between people and nature in the City’s land development patterns and infrastructure design.

UG-5 Increase Springfield’s capability to respond to natural hazard impacts and to enhance public safety, health and robustness of the economy and natural environment. Create opportunities for innovative urban development and economic diversification.

MANAGING URBAN TRANSITION

Springfield manages the orderly and efficient transition of land from rural to urban to implement the Urbanization Planning Goals through application of the following planning policies, implementing ordinances, tools and procedures:

- The Urban Growth Boundary
- Comprehensive plan designations and policies
- Springfield Zoning Map
- Springfield Development Code land use regulations and development standards — including the Annexation process
- Planned provision of urban facilities and services:
 - Metropolitan Public Facilities and Services Plan
 - Springfield Wastewater and Stormwater Master Plans
 - Springfield Transportation System Plan
 - Springfield Capital Improvement Program

SPRINGFIELD URBAN GROWTH BOUNDARY

The Springfield UGB establishes a 20-year supply of land based on demonstrated need to accommodate long range population growth and demonstrated need for housing, employment

opportunities, livability and uses such as public facilities, streets and roads, schools, parks or open space.

The UGB is mapped and specifically delineated along its entire circumnavigation of the city.

The UGB is graphically depicted in the “Springfield Urban Growth Boundary map.” The UGB Technical Supplement² to the **Urbanization Element** provides documentation to more precisely describe the parcel-specific boundary location — a description of the methodology used by Springfield to prepare the precise UGB location using contemporary Geographic Information Systems (GIS) technology, previous urban growth boundary location descriptions, surveys, applicable sections of the ORS and OARs and related land use decisions; and a list of tax lots that are split by the UGB. **Where existing and planned right-of-way comprise portions of the UGB, the full width of that right-of-way lies within the UGB, except along the western track where the boundary is mapped and described as the center line of Interstate Highway 5 between the north-bound and south-bound lanes.**

Springfield’s urban and urbanizable area extends approximately 5 miles from north (Gateway) to south (Glenwood McVay corridor) along the Interstate Highway 5 corridor as it travels through the Eugene-Springfield metro area; and approximately 8.6 miles from west to east as measured along the Franklin Boulevard-Main Street Corridor-McKenzie Highway from the Interstate Highway 5 Willamette River bridge to the easternmost point of the UGB. The Springfield UGB includes most but not all land between the McKenzie River on the north and the Middle Fork Willamette River on the south. The eastern portion of the UGB includes the Thurston South Hills and follows the ridgeline south and west to Jasper Road to encompass the area known locally as Jasper-Natron.

INSERT FOLDOUT MAP 11 x 17 size Springfield Urban Growth Boundary

SPRINGFIELD UGB AMENDMENTS 2011-2015

Prior to 2011, Springfield and Eugene shared one Metro Area UGB. Oregon Revised Statute 197.304 (2007) required both cities to independently conduct housing needs analyses and to establish separate UGBs to meet those needs. In 2007, Springfield began an evaluation of the UGB for two categories of land need: housing and employment.

The Springfield UGB was first acknowledged in 2011, designating a land supply to meet the City’s residential land and housing needs for the 2010-2030 planning period.³ The Springfield UGB included all of the lands and waters within the previously acknowledged Eugene-

² Springfield Ordinance [REDACTED], Lane County Ordinance [REDACTED], Exhibit C-2 UGB Technical Supplement

³ Springfield Ordinance No. 6268, Lane County Ordinance No. PA 1274

Springfield Metropolitan Area General Plan Boundary located east of the centerline of Interstate Highway 5. The UGB provides sufficient land designated to meet all residential land needs through the year 2030 without expanding the UGB — through implementation of plan and zoning amendments and Springfield Development Code land use efficiency measures.

The UGB was subsequently amended in 2016 to designate a 20-year land supply for employment and natural resource protection, and to designate public land for parks, open space and public/semi-public facilities.⁴ With the exception of seven needed employment sites larger than five acres, the City’s employment land inventory was found to be sufficient to meet all employment land needs for the planning period without expanding the UGB. The employment land UGB expansion added approximately 257 suitable and developable acres to provide sites for target industries and uses that require sites larger than 5 acres.⁵ The public land UGB expansion added approximately 455 acres of publicly-owned land to the UGB. The Springfield UGB as amended and acknowledged in 2016 contains approximately 15,411 acres of land.

RELATIONSHIP TO THE METRO PLAN, FUNCTIONAL PLANS AND REFINEMENT PLANS

The Springfield Comprehensive Plan **Urbanization Element** was adopted as an amendment to the Eugene-Springfield Metropolitan Area General Plan by the City of Springfield and Lane County as a city-specific comprehensive plan policy element to independently address a planning responsibility that was previously addressed on a regional basis in the Metro Plan.⁶ The **Urbanization Element** goals, policies and implementation actions replace the more general Metro Area-wide goals, findings and policies contained in Metro Plan sections entitled “Growth Management Goals, Findings and Policies” (Metro Plan II-C) and “Urban and Urbanizable Land” (Metro Plan II-E) for lands within the Springfield UGB.

The Metro Plan establishes a broad regional framework for Eugene, Springfield, and Lane County to coordinate comprehensive planning within the Eugene-Springfield Metropolitan planning area. Metro Plan Chapter I explains the relationship between city-specific comprehensive plans, the broad policy framework of the Metro Plan and the regionally-coordinated functional plans. The Springfield Comprehensive Plan elements — including this **Urbanization Element** — explicitly supplant the relevant portion of the Metro Plan. Should inconsistencies occur between the Springfield Comprehensive Plan and a refinement or

⁴ Springfield Ordinance [redacted], Lane County Ordinance [redacted], Exhibit A-2

⁵ *Springfield Commercial and Industrial Land Inventory and Economic Opportunities Analysis, 2015*

⁶ Metro Plan pp. iii-iv and Chapter II describes the incremental Metro planning area shift towards separate Springfield and Eugene UGBs and city-specific comprehensive plans.

functional plan, or references in the Springfield Development Code that refer to Metro Plan policies, the Springfield Comprehensive Plan is the prevailing policy document.⁷

RESPONSIBILITIES FOR LAND USE PLANNING AND DEVELOPMENT WITHIN THE SPRINGFIELD URBAN GROWTH BOUNDARY

Metro Plan Chapter II and Chapter IV describe jurisdictional responsibilities within the Eugene-Springfield Metropolitan planning area. The division of responsibility for metropolitan planning between the two cities is the Interstate 5 Highway. Springfield, Eugene and Lane County are required to co-adopt a UGB or Metro Plan boundary change that crosses the Interstate 5 Highway. For purposes of other amendments and implementation of the Metro Plan, Lane County has joint responsibility with Springfield between the city limits and the Metro Plan Boundary east of the Interstate 5 Highway.

Metro Plan Chapter IV describes the procedures for review, amendments and refinements of the Metro Plan, including amendments of the Metro Plan adopting singular or multiple Elements of the Springfield Comprehensive Plan that explicitly supplant relevant portions of the Metro Plan. Metro Plan amendments that are being considered in conjunction with a city-specific plan adoption or amendment follow the procedures described in Metro Plan Chapter IV.

Land use planning and development within the Springfield City Limits is the sole responsibility of the City of Springfield. Land development within Springfield's urbanizable areas is planned and cooperatively administered by the City of Springfield in coordination with Lane County in accordance with the policies in this Plan and as described in the ORS 190 Intergovernmental Agreement (1987) between the City of Springfield and Lane County.⁸ The Agreement delegated building, zoning, and planning administration and decision making authority for services for the land between Springfield's UGB and the city limits from the County to the City of Springfield and describes criteria and procedures for land regulation and management.

[Planning for regionally significant public investments within Springfield's UGB is coordinated on a metropolitan-wide basis by utilizing the regional transportation planning and public facilities](#)

⁷ During the period of transition from Metro Plan to local comprehensive plans, Springfield's "comprehensive plan" consists of the acknowledged Metro Plan and the acknowledged Elements of the Springfield 2030 Comprehensive Plan.

⁸ *Agreement Regarding the Transfer of Building and Land Use Responsibilities within the Urbanizable Portion of the Springfield Urban Growth Boundary*, January 1, 1987.

planning processes⁹ as described in the Metro area functional plans — including the Eugene-Springfield Public Facilities and Services Plan and the Regional Transportation System Plan. Some of Springfield’s neighborhood refinement plans (such as the Glenwood Refinement Plan) may include a refined level of policy guidance for urbanization in specific locations within Springfield’s UGB.

PLAN DESIGNATION AND ZONING OF UNINCORPORATED “URBANIZABLE” LANDS IN THE UGB

The unincorporated land within the Springfield UGB is urbanizable and is considered part of Springfield’s land base for housing and employment as identified in the most recent buildable land inventories. It is assumed that buildable¹⁰ lands will eventually be included in the City’s incorporated area and developed to accommodate designated urban uses and densities.

Urbanizable lands exist in various areas of the Springfield UGB and are designated for a variety of land uses as shown in Table 1. The land use designation determines the applicable zoning, both before after annexation. In addition to the plan designation, zoning and the applicable policies of this **Urbanization Element**, Springfield is required by Oregon law to implement land use controls regulating interim development on unincorporated land to prevent land divisions and uses that would preclude future development of planned urban uses and densities. As shown in Table 1, Springfield Zoning implements this provision of the law through two different zoning mechanisms in the Springfield Development Code: 1) the Agriculture - Urban Holding Area Zoning District (AG) was established and applied to land after 2015 to implement the Urban Holding Area -Employment and Natural Resource plan designations; and 2) the Urbanizable Fringe Overlay Zoning District (UF-10) was established and applied to lands prior to 2015 and is a zoning overlay placed over multiple plan designations. Both zoning mechanisms were established to implement the goal of compact growth through provisions that maintain the supply of land for urban development in areas between the City limits and the UGB. Unincorporated public land designated Government and Education or Public/Semi Public is zoned Public Land and Open Space on the Springfield Zoning Map.

⁹ For other related policy discussion, see the [Public Facilities and Services Element in Metro Plan Chapter III-G](#). The Springfield Comprehensive Plan does not address service districts.

¹⁰ Some lands have absolute development constraints that for inventory purposes are not assumed to be buildable. See Findings section this Element for more information.

**Table 1: Urbanizable Land
Plan Designations and Applicable Zoning Districts**

Metro Plan Designation	Springfield Zoning District(s) applicable before annexation	Springfield Zoning District(s) applicable after annexation
Urban Holding Area — Employment	Agriculture — Urban Holding Area (AG) Zoning District	Employment zoning such as: Employment Mixed Use ¹¹ Campus Industrial Employment
Special Heavy Industrial Light Medium Industrial	Urbanizable Fringe Overlay District (UF-10)	Special Heavy Industrial ¹² Light Medium Industrial
Commercial	Urbanizable Fringe Overlay District (UF-10)	Community Commercial
Low Density Residential Medium Density Residential High Density Residential	Urbanizable Fringe Overlay District (UF-10)	Low Density Residential Small Lot Residential ¹³ Medium Density Residential High Density Residential
Glenwood Residential Mixed Use Glenwood Commercial Mixed Use Glenwood Office Mixed Use Glenwood Employment Mixed Use	Urbanizable Fringe Overlay District (UF-10) and Glenwood Riverfront Mixed-use Plan District	Glenwood Residential Mixed Use Glenwood Commercial Mixed Use Glenwood Office Mixed Use Glenwood Employment Mixed Use
Glenwood Refinement Plan: Low Density Residential	Urbanizable Fringe Overlay District (UF-10)	Low Density Residential Special Density Residential ¹⁴
Glenwood Refinement Plan: Light Medium Industrial	Urbanizable Fringe Overlay District (UF-10)	Light Medium Industrial ¹⁵
Glenwood Refinement Plan: Parks and Open Space	Public Land and Open Space (PLO)	Public Land and Open Space (PLO)
Public – Semi Public	Public Land and Open Space (PLO)	Public Land and Open Space (PLO)
Natural Resource	Agriculture — Urban Holding Area (AG) Zoning District	Natural resource protection zoning such as: Natural Resource Public Land and Open Space Natural Resource Overlay
Government and Education	Public Land and Open Space (PLO) ¹⁶	Public Land and Open Space (PLO)

¹¹ Zoning to be determined through subsequent Springfield 2030 Comprehensive Plan or refinement plan updates

¹² Ibid.

¹³ Ibid.

¹⁴ Ibid. Springfield Comprehensive Plan Residential Land Use and Housing Element Policy H.7, Implementation Action 7.4 requires analysis to determine applicability of small lot zoning in Glenwood south of Franklin Blvd.

¹⁵ Zoning to be determined through subsequent Springfield 2030 Comprehensive Plan or refinement plan updates

¹⁶ Ibid.

Urban Holding Area - Employment (UHA-E) Metro Plan Designation

Lands brought into Springfield's UGB to address 2010-2030 land needs for suitable large employment sites are designated Urban Holding Area – Employment (UHA-E) as an interim plan designation to maintain the land's potential for planned urban development until appropriate urban facilities and services are planned or available and annexation to Springfield can occur.

The Urban Holding Area – Employment (UHA-E) plan designation reserves suitable large employment sites to meet Springfield's long term employment land needs for the 2010-2030 planning period. Lands within the UHA-E designation are planned and zoned for the primary purpose of reserving an adequate inventory of large employment sites that are well located and viable for industry and not easily replicable elsewhere. The Springfield 2030 Comprehensive Plan designates suitable large sites for employment uses that generate significant capital investment and job creation within — but not limited to — targeted industry sectors, business clusters and traded-sector¹⁷ industries identified in the most recent economic opportunities analysis and Economic Element policies of this Plan.

The City expanded the UGB in 2016 to support diversification of the economy by increasing opportunities for siting target industry employers that require large sites. The expansion was based on the lack of vacant or potentially redevelopable parcels larger than five acres in the City's 2008 inventory of employment land and the need for large parcels identified in the Economic Opportunities Analysis.¹⁸ In 2008-2016, the City conducted an Urban Growth Boundary Alternatives Analysis and discovered that few viable options exist for bringing in suitable large parcels of employment land close enough to the City's urban area to maintain a compact urban form. This is due to Springfield's geography and topography. The City is situated between the McKenzie and Willamette Rivers and their floodplains, and surrounded by steeply sloped hills on three sides, thus suitable, serviceable, close-in land is in scarce supply. The Urban Holding Area - Employment (UHA-E) designation reserves employment sites within urbanizable areas of 50 or more suitable acres to support creation of economic districts that will accommodate the site needs of target employment sectors. The size of employment districts and parcels of urbanizable land designated UHA-E provides adequate dimension so as to maximize the utility of the land resource and enable the logical and efficient extension of services to all parcels within the UHA.

The UHA-E plan designation and Agriculture – Urban Holding Area Zoning District work together to serve important purposes in the 2030 Comprehensive Plan. Land suitable for large employers is identified, reserved and protected from incompatible interim development.

¹⁷ ORS 285A.010(9)

¹⁸ Springfield Commercial and Industrial Buildable Land Inventory and Economic Opportunities Analysis, Table 5-4

Bringing these lands into the UGB as designated holding areas subject to the policies of this Urbanization Element and the regulations of the Springfield Development Code establishes the first step for the City — in cooperation with Lane County — to comprehensively plan the urbanizable land supply to accommodate long range employment site needs and to protect natural resources. The UHA-E designation remains in effect until the appropriate employment designation is adopted through a City-initiated planning process or an owner-initiated plan amendment process. Lands designated UHA-E and zoned AG are located in two areas of the UGB:¹⁹

Table 2: Urbanizable Land Designated Urban Holding Area – Employment (UHA-E)

Name of Area	Acres Designated UHA-E	Acres Zoned AG	# of Suitable employment acres (UHA-E)	Location
North Gateway UHA -E	139.4 gross acres (includes right of way)	193	132.1 suitable acres	North of Gateway/International Way, east of I-5
Mill Race District UHA-E	133 gross acres (includes right of way)	135	125 suitable acres	South of Main Street, via South 28 th and M Streets

Insert 11 x 17 plan designation maps

Springfield Development Code Agriculture – Urban Holding Area (AG) Zoning District Implements the UHA-E Plan Designation

Lands within the UHA-E designation are zoned Agriculture – Urban Holding Area²⁰ to retain large parcel sizes and current predominant farm uses until land is planned and zoned to allow urban development.

The Springfield Development Code Agriculture – Urban Holding Area Zoning District (AG) is established to implement the goal of compact growth through provisions that control the potential for premature or incompatible development on large sites added to the UGB to diversify the economy. The AG District includes provisions to limit the division of land and prohibit urban development. A 50-acre minimum lot size is applied to lots/parcels greater than 50 acres and a 20-acre minimum lot size is applied to lots/parcels less than 50 acres to protect undeveloped sites from inefficient piecemeal development until land is planned and zoned to allow annexation and site development with urban employment uses and densities.

All interim development in the AG District must be designed to City standards.

¹⁹ Springfield Ordinance [redacted], Lane County Ordinance [redacted], Exhibit A-2

²⁰ Springfield Ordinance [redacted], Lane County Ordinance [redacted], Exhibit A-3

Natural Resource (NR) Metro Plan Designation - North Gateway Site

Land in North Gateway brought into Springfield’s UGB to address 2010-2030 land needs for suitable large employment sites includes portions of properties within the floodway of the McKenzie River. Land in the floodway is considered to be constrained for development and is not counted as developable in the City’s land Inventories. Including the floodway portion of the site in the UGB allows consistent land use administration of the floodplain pursuant to the purposes and standards of the Springfield Development Code Floodplain Overlay District standards. The portion of the site North Gateway site within the FEMA floodway is designated Natural Resource, a designation applied to privately and publicly owned lands where development and conflicting uses are prohibited to protect natural resource values. In addition to the purposes of the Floodplain Overlay District, land designated Natural Resource is protected and managed for fish and wildlife habitat, soil conservation, watershed conservation, scenic resources, passive recreational opportunities, vegetative cover, and open space.

Table 3: Urbanizable Land Designated Natural Resource (NR)

Name of Area	Acres Designated Natural Resource	Acres Zoned AG	Location
North Gateway Natural Resource (NR)	53	53	North of Gateway/International Way, east of I-5

Springfield Development Code Agriculture – Urban Holding Area (AG) Zoning District Implements the Natural Resource Plan Designation

Lands within the Natural Resource designation are zoned Agriculture – Urban Holding Area to retain predominant farm uses and to direct development towards the unconstrained portions of the property that are designated UHA-E for employment uses.

Springfield Development Code Agriculture – Urbanizable Fringe Zoning Overlay District (UF-10) Implements Varied Plan Designations

The UF-10 Overlay District is applied over multiple plan designations as shown in Table 1, and includes unincorporated land in the following eight geographic areas of the UGB:

West Centennial	Thurston South Hills
Gateway-Hayden Bridge	Jasper-Natron
Clearwater	South 2 nd Street
Thurston	Glenwood

The UF-10 Overlay District includes provisions to limit the division of land and prohibit urban development. All interim development in the UF-10 Overlay District must be designed to City standards. The UF-10 Overlay is removed automatically when annexation to the City is approved through the City's land use review process, as described in the Springfield Development Code Annexation chapter.

SPRINGFIELD ANNEXATION PROCESS

The annexation process — as articulated in the Springfield Development Code — guides the efficient transition of land from rural to urban uses to accommodate population and urban employment growth within Springfield's UGB by:

- Providing land to accommodate future urban development;
- Providing land to accommodate necessary public facilities or services; and
- Ensuring that land designated to accommodate population and urban employment growth is developed to achieve its planned urban uses, densities and economic potential in a manner consistent with the urban development standards of the Springfield Development Code.

Oregon law grants Springfield City Council the authority to review and approve or deny petitions to annex territory located within Springfield's UGB to the City. Statutory requirements for annexation are implemented through the Springfield Development Code. The Code prescribes the City's land use process and criteria for approving annexation petitions.

The intent is that annexation will occur incrementally as property owners desire to develop or redevelop land. Annexation is required when unincorporated property is proposed to be developed or redeveloped with planned urban uses and densities or where necessary to abate public health hazards²¹ such as failed septic systems.

Key Urban Services Required for Annexation to the City of Springfield

The policies and implementation strategies in the **Urbanization Element** ensure that urban facilities and services directly related to land use planning and the efficient transition of land from urbanizable to urban pursuant to Goal 14 Urbanization are provided to urbanizable lands in a timely, orderly, and efficient manner to serve planned land uses within Springfield's urban growth boundary and within the metropolitan area. The Springfield Comprehensive Plan **Urbanization Element** retains the long-standing Metro area urbanization policy criteria for approving annexations:

Springfield Comprehensive Plan Urbanization Element Policy 30:

Unincorporated land within the Springfield UGB may be developed with permitted uses at maximum density only upon annexation to the City when it is found that key urban facilities and services can be provided to the area to be annexed in an orderly and efficient manner. Provision of these services to the area proposed for annexation is consistent with the timing and location for such extension, where applicable, in the City's infrastructure plans — such as the Public Facilities and Services Plan; the Springfield Transportation System Plan; the City's Capital Improvement Program; and the urbanization goals, policies and implementation strategies of this Element — or a logical time within which to deliver these services has been determined, based upon demonstrated need and budgetary priorities.

Oregon law includes requirements that must be met prior to annexation approval to ensure orderly growth, such as prohibiting non-contiguous annexations and providing information about properties' contribution to offsite public systems. Oregon Administrative Rules establish policies to protect public waters from human health hazards, including standards and permitting requirements for onsite wastewater treatment systems construction, alteration and repair. These rules require connection to a sewerage system that can serve the proposed sewage flow when such a system is physically and legally available within the distances specified in the OARs. The City of Springfield requires annexation before wastewater services are extended as planned in the Metropolitan Public Facilities and Services Plan.

²¹ Oregon Revised Statutes Chapter 222 Health Hazard Abatement

For the purposes of land use planning and annexation, the Springfield Comprehensive Plan defines **key urban facilities and services as those services and facilities that are necessary to serve planned urban uses and densities in accordance with applicable Statewide Planning Goals, statutes and administrative rules:** wastewater service; stormwater service; transportation; solid waste management; water service; fire and emergency medical services; police protection; citywide park and recreation programs; electric service; land use controls; communication facilities; and public schools on a district-wide basis. All references to Metro Plan policies regarding “key urban services” in Springfield refinement plans and the Springfield Development Code shall be amended to reference Springfield Comprehensive Plan Urbanization Element Policy 30. This plan does not address facilities and services provided by Lane County²², the State of Oregon, or the Federal government, and does not preclude provision of those services within Springfield.

The availability of key urban services is determined by Springfield and/or applicable public and private service providers at the time of the annexation request, based on a determination of existing and planned capacity, existing and proposed uses, and costs. The land use application process for annexation is described in the Springfield Development Code. If key urban services are not available to serve the site at the time the annexation request is made, the Code requires an Annexation Agreement to ensure that services will be provided in a timely manner. The Annexation Agreement states the terms, conditions, and obligations of the property owner and the service providers regarding the fiscal and service impacts to Springfield associated with the annexation, provision of infrastructure, and future development of the property.

PLAN AMENDMENT PROCEDURES AND REQUIREMENTS TO DESIGNATE UHA-E URBANIZABLE LAND FOR URBAN DEVELOPMENT BEFORE ANNEXATION AND DEVELOPMENT APPROVAL

Lands designated UHA-E require comprehensive plan amendments and may require facility plan amendments prior to their designation and zoning for urban employment use. The policies and implementation strategies in this **Urbanization Element** describe Statewide Planning Goal requirements that must be addressed prior to approval of plan and zoning changes that allow the transition from urbanizable to urban on lands designated UHA-E. Specific policies and implementation strategies are listed under each Urbanization Planning Goal to identify the

²² Lane County provides the following services on a county-wide basis: sheriff and corrections, criminal prosecution, parole and probation; elections; regional transportation; mental health and public health services; workforce assistance; animal services; and regional parks and facilities.

steps needed before land may be designated, zoned and annexed to permit development to occur. These steps ensure that ample opportunities for citizen involvement are provided through community refinement planning processes conducted at the district scale to establish employment land use designations, zoning, design and development standards, transportation systems and public facilities to meet and balance community and industry needs in the North Gateway and Mill Race Districts.

Planning Requirements in Urban Holding Areas

District, refinement plan or master plan approval is required prior to or concurrent with annexation of land designated Urban Holding Area- Employment as shown in Table 3. Urban Holding Areas are zoned Agriculture - Urban Holding Area (AG) prior to plan amendment approval and prior to annexation.

Table 5: Pre-Development Approval Process Steps – Urban Holding Areas	
City-initiated Planning Process	Owner-initiated Planning Process
1. City prepares Plan Amendment to address all applicable Statewide Planning Goals (e.g. amended or new refinement plan or district plan), Metro Plan and 2030 Comprehensive Plan policies and Springfield Development Code standards.	1. Applicant submits request to City to initiate amendments to Transportation System Plan and Public Facilities and Services Plan, and other city actions that may be required prior to plan amendment approval.
2. City and Lane County approve Plan Amendment to amend Metro Plan and Springfield 2030 Comprehensive Plan. UHA-E designation is replaced with employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, Industrial). AG zoning remains in effect until Master Plan and new zoning are approved.	2. Applicant prepares and submits Plan Amendment application to address all applicable Statewide Planning Goals, Metro Plan and 2030 Comprehensive Plan policies, and Springfield Development Code standards. Applicant proposes employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, Industrial).
3. City prepares and approves Zoning Map Amendment to apply new zoning districts (e.g. Industrial, Campus Industrial, Employment Mixed Use, Employment). Land is planned and zoned and eligible for annexation.	3. City and Lane County approve Plan Amendment to amend Metro Plan and Springfield 2030 Comprehensive Plan. UHA-E designation is replaced with employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, Industrial). AG zoning remains in effect until Master Plan and new zoning are approved.
4. Applicant prepares and submits Master Plan and annexation applications with	4. Applicant prepares and submits Master Plan with proposed zoning and

demonstration of key urban service provision.	demonstration of key urban services provision. Applicant submits annexation application.
5. City approves City approves Master Plan and annexation.	5. City approves Master Plan and Zoning Map Amendment and annexation.
6. Applicant submits Master Plan Type III, and Site Plan, Subdivision etc. Type II development applications.	6. Applicant submits Site Plan, Subdivision etc. Type II development applications.

DRAFT

URBANIZATION ELEMENT GOALS, POLICIES AND IMPLEMENTATION STRATEGIES

Commentary: Draft policies were prepared with the input of the Springfield City Council, City of Springfield and Lane County staff, SUB staff, and City and Lane County attorneys to address the policies necessary to demonstrate and ensure that development within the UGB is consistent with applicable Statewide planning goals, statutes and administrative rules, applicable Metro Plan policies, and the City's existing annexation policies. The draft policies also address input received from the public and from public agencies through the 2010 Springfield and Lane County Planning Commission public hearing process and subsequent public facilities analysis by staff and service providers.

Commentary: After approval of the Urbanization Element, the following section will be formatted and numbered to be consistent with 2030 Residential and Economic Elements that list policies and implementation strategies under the corresponding **2030 Plan Urbanization Goals**. For discussion purposes, policies are numbered and implementation strategies are bulleted. **Green font = 2030 Urbanization Element Planning Goals** **Blue font = Metro Plan policies carried over into the 2030 Plan.**

The **Springfield 2030 Urbanization Element** Planning Goals express the desired community development outcomes and benefits the City aspires to achieve by planning and managing land in new growth areas before the land is annexed to become part of the City.

The **Springfield 2030 Urbanization Element** Policies and Implementation Strategies are the City's agreements and commitments to manage urban growth in ways that provide and sustain a healthy, prosperous and equitable environment aligned with Springfield's interests, values and assets. The adopted policy statements and implementation strategies in this plan provide a consistent course of action, moving the community toward attainment of its goals. Some policies and strategies call for immediate action; others require additional studies or community planning processes to develop more detailed or specific area plans or policy updates.

UG-1 Promote compact, orderly and efficient urban development by guiding future growth to vacant sites and redevelopment areas within the established areas of the city and to urbanizable lands where future annexation and development may occur.

1. Urbanizable lands within the 2030 UGB shall be converted to urban uses as shown in the Metro Plan Diagram and as more particularly described in neighborhood refinement plans, other applicable area-specific plans, and the policies of this Plan.

The following draft policy means that when plan and zoning amendments are proposed and adopted that allow more development capacity (e.g. higher density development) on land than was permitted under the previous plan designation and zoning, the City may assume those effects when determining the impact of proposed plan amendments on the overall buildable land supply. This is consistent with existing policy and practice and provides flexibility for the City to approve land use plan changes that add capacity or re-allocate capacity within the UGB.

2. Continue to support and facilitate redevelopment and efficient urbanization through City-initiated area-specific refinement planning and zoning amendments consistent with the policies of this Plan. Plans shall designate an adequate and competitive supply of land to facilitate short-term and long-term redevelopment activity. Efficiency measures achieved through plan amendments may be reflected in land supply calculations to the extent that they are likely to increase capacity of land suitable and available to meet identified needs during the relevant planning period.
 - Continue to provide public policy and financial support when possible for redevelopment in Springfield.
 - Continue to prioritize and incentivize redevelopment in the Glenwood and Downtown urban renewal districts and support redevelopment throughout the City as described in the Economic and Residential Elements of this Plan.
 - Continue to provide development tools and incentives (such as Urban Renewal support) within targeted priority redevelopment areas as resources become available to facilitate expedient and economically feasible redevelopment.
 - Continue to conduct focused planning in key redevelopment areas, as directed by the City Council, as resources are available. Such efforts will review, update and supersede existing refinement plan designations and policies.
 - Identify and include public agencies and private stakeholder partners in district-specific planning efforts to facilitate redevelopment through partnerships and other cooperative relationships.
3. Any development taking place within the City's urbanizable area shall be designed to the development standards of the Springfield Development Code.

Policies: Development within the Urban Holding Area- Employment Designation

4. Urbanizable lands added to Springfield’s acknowledged UGB by Ordinance X, date X to meet employment needs are designated “Urban Holding Area- Employment” (UHA-E) in the Metro Plan consistent with the employment site needs criteria for their inclusion in the UGB.²³ The UHA-E designation reserves employment sites within urbanizable areas of 50 or more suitable acres to support creation of economic districts that will accommodate the site needs of target employment sectors. The size of employment districts and parcels of urbanizable land designated UHA-E shall be of adequate dimension so as to maximize the utility of the land resource and enable the logical and efficient extension of infrastructure to serve the North Gateway or Mill Race urbanizable area.
5. Lands designated UHA-E are planned and zoned for the primary purpose of reserving an adequate inventory of large employment sites that is well located and viable for industry and not easily replicable elsewhere for employment uses that generate:
 - A significant capital investment;
 - Job creation within — but not limited to — targeted industry sectors, business clusters and traded-sector²⁴ industries identified in the most recent economic opportunities analysis and Economic Element policies of this Plan.
6. Lands designated “Urban Holding Area-Employment” are zoned “Agriculture – Urban Holding Area” (AG) on the Springfield Zoning Map and are subject to the development standards of the Springfield Development Code AG Zoning District.

The City is bringing land into the UGB to accommodate the need for large employment sites. The following policies restrict land division to protect those large sites for employers that need large sites.

7. For lots/parcels greater than 50 acres in the North Gateway UHA-E District, the minimum lot/parcel size for land division is 50 acres. Land divisions that create lots/parcels for the purpose of establishing a Natural Resource or Public/Semi-Public Parks and Open Space designation within the floodway, wetland or riparian resource portions of the site may create lots/parcels less than 50 acres within the Natural Resource or Public/Semi-Public Parks and Open Space designation portion of the parent lot/parcel. Lots/parcels created and designated for employment purposes shall retain

²³ Employment site needs are explained in the Economic Element of this Plan, and in the Springfield Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis, 2015.

²⁴ ORS 285A.010(9)

the 50-acre minimum until planned and zoned to allow annexation and site development with urban employment uses and densities consistent with the policies of this Plan.

The following policy retains large parcels. The area's existing Lane County zoning is EFU-25 (25-acre minimum).

8. For lots/parcels less than 50 acres in the North Gateway and Mill Race UHA-E Districts, the minimum lot/parcel size for land division is 20 acres. Land divisions that create lots/parcels for the purpose of establishing a Natural Resource or Public/Semi-Public Parks and Open Space designation within the floodway, wetland or riparian resource portions of the site may create lots/parcels less than 20 acres within the Natural Resource or Public/Semi-Public Parks and Open Space designation portion of the lot/parcel. Lots/parcels created and designated for employment purposes shall retain the 20-acre minimum until planned and zoned to allow annexation and site development with urban employment uses and densities consistent with the policies of this Plan.

The following policy suggests one way the City Council could provide an incentive for development.

9. As directed by the City Council, the City will conduct comprehensive planning processes and adopt refinement-level plans and implementation measures to guide and regulate urban development in the North Gateway and Mill Race UHA-E districts. The Transportation Planning Rule requirements under OAR 660-012-0060 will be addressed prior to any re-designation or zoning map amendment that allows urbanization.
10. Refinement Plans, District Plans, Master Plans and zoning for land within the UHA-E designation shall support cohesive design and development of innovative Employment districts that provide attractive sites for economic development in convenient proximity to natural and recreational amenities and infrastructure systems designed to integrate and protect water quality, Springfield's Drinking Water Source Areas, riparian, wetland and groundwater resources, aquifer recharge, and floodplain functions with compatible employment uses.
11. Plan and zone land within the UHA-E designation to provide suitable employment sites 20 acres and larger to accommodate clean manufacturing²⁵ uses and office/tech/flex

²⁵ For the purposes of this policy, "clean" is defined as land uses, construction practices, and business operations that minimize waste and environmental impacts, and that contribute to a safe, healthy, and clean community, maintain the aquifer recharge capacity of the site by reducing impervious surfaces, and protect Springfield's drinking water source areas from contamination.

employers in Springfield's target industry sectors. Limited neighborhood-scale retail uses that primarily serve employees within an industrial or office building or complex may be permitted as a secondary element within employment mixed-use zones. Urban Holding Area-Employment (UHA- E) sites shall not be re-designated or zoned to permit development of regional retail commercial uses.

12. Master plans are required for contiguous ownerships over 5 acres designated UHA-E and shall address all of the policies of this Plan and the Master Plan requirements of the Springfield Development Code.

The following policies (in blue font) are existing Metro Plan policies applicable to unincorporated land within the existing UGB. The UF-10 overlay is an existing Springfield zone applied to these lands until they are annexed.

Policies: Development within the Urbanizable Fringe (UF-10) Overlay Zoning District

13. Unless the following conditions are met, the minimum lot size for campus industrial designated areas in the UF-10 Zoning District shall be 50 acres and the minimum lot size for all other designations in the UF-10 Zoning District shall be 10 acres. Land division in the UF-10 Zoning District will be subject to the following requirements:
 - a. The approval of a conceptual plan for ultimate development at urban densities in accordance with applicable plans and policies. The conceptual plan shall remain in effect until superseded by other plans or actions required to enable full urban density development.
 - b. Proposed land uses and densities conform to applicable plans and policies.
 - c. The owner of the property has signed an agreement with the city which provides that the owner and his or her successors in interest are obligated to not remonstrate against annexation proceedings should the city, at its option, initiate annexation.
14. Any proposed land division in the UF-10 District that creates any lot under five acres in size will require utilizing the following additional standards:
 - a. The property will be owned by a governmental agency or public utility.
 - b. A majority of parcels located within 100 feet of a boundary of the property are smaller than five acres.
 - c. The land division does not result in more than 3 parcels.

15. The siting of all residences on urbanizable lots served by on-site sewage disposal systems shall be reviewed by Lane County to ensure the efficient future conversion of these lots to urban densities according to *Plan* assumptions and minimum density requirements.
16. The Development and Public Works Director may accept the use of on-site sewage disposal systems as a temporary measure for approval of industrial and commercial development proposals within Campus Industrial designated areas in conjunction with annexation to a city provided:
 - a. it is in the City's interest to encourage economic diversification; and
 - b. extension of the public wastewater system is imminent or is identified as part of an approved capital improvement program; and
 - c. an annexation agreement establishes the timeframe for connecting to the public wastewater system.

UG-2 Promote efficient and economical patterns of mixed land uses and development densities that locate a variety of different life activities, such as employment, housing, shopping and recreation in convenient proximity; and where accessible by multiple modes of transportation — including walking, bicycling, and transit in addition to motor vehicles — both within and between neighborhoods and districts.

The following policies suggest ways the City Council could provide incentives to prepare sites for development to meet employment land needs.

17. In new growth and redevelopment areas throughout the City, plan and support the transition to transportation-efficient land use patterns by providing incentives such as City-initiated plan and zoning updates, technical assistance, implementation of design standards, and permit processing assistance to guide the development of well-designed neighborhoods, efficient and economically viable mixed use districts and corridors.
18. Within districts and neighborhoods currently characterized by a limited range of land uses and activities, pursue comprehensive planning and zoning code updates to allow for mixed-use development at appropriate locations as one method of providing additional land use diversity and choices — as described in the Economic and Residential Land Use Elements of this plan.

19. Support new development and redevelopment in mixed use areas to address Springfield's needs for housing, employment, and shopping opportunities in connected walkable neighborhood locations served by the region's frequent transit network (FTN).
20. Plan and zone land to support transit-oriented land use patterns and development, including but not limited to higher intensity development in the City's employment and commercial centers and along major transit corridors; employment uses located within ¼ mile of transit stations or stops; and residential development within ½ mile of transit stations or stops.
21. As permitted under Oregon law, [require improvements in new commercial, public, mixed use, and multi-unit residential development that encourage walking, bicycling and the use of transit.](#)
22. Plan and zone the North Gateway UHA-E area to guide development of a well-designed employment district adjacent to the Interstate 5 economic corridor to support diversification and improvement of the local, regional and state economies and to make efficient use of existing and planned public transportation systems and infrastructure. Applicant-initiated plan designation and zoning changes shall address logical extension of transportation and public facilities to serve the entire North Gateway UHA-E district. Development within the North Gateway District shall be zoned and designed to enhance the distinctive physical surroundings and natural resources of the area while accommodating growth and change through implementation of attractive building exteriors and low impact development practices.
23. Amend the Gateway Refinement Plan to include the North Gateway UHA-E area prior to or concurrent with approval of an owner-initiated plan amendment or zone change that allows urban development in the North Gateway UHA-E area. The amended Gateway Refinement Plan shall describe the logical extension of transportation and public facilities to serve the entire North Gateway UHA-E area.
24. Lands added to the UGB in 2016 for employment, public facilities, parks, open space and recreation in the Mill Race area shall be comprehensively planned in the context of a larger Mill Race District that includes the Booth Kelly Mixed Use site and the industrially-zoned lands south of the railroad corridor. The plan shall identify opportunities for integrating economic development, recreation, arts, culture, historic interpretation, and pedestrian/bicycle connectivity between the Middle Fork Willamette River and Downtown

District; and shall identify development standards that protect Drinking Water Source Areas and other natural resources from incompatible development.

25. As depicted in Ordinance [REDACTED] Exhibit A-2 certain lands developed with and occupied by Springfield Utility Board and Eugene Water and Electric Board facilities are included in the 2015 UGB expansion and are designated Public/Semi Public to accommodate and protect Springfield's public water system facilities and Drinking Water Source Areas and shall not be re-designated to allow for other urban uses.
26. As depicted in Ordinance [REDACTED] Exhibit A-2, certain Willamalane Park and Recreation District lands, parks and facilities are included in the 2016 UGB expansion and are designated Public/Semi Public to accommodate community needs for open space and recreation and shall not be re-designated to allow for other urban uses.

UG-3 Provide an adequate level of urban services, including but not limited to public water, wastewater, and stormwater management systems, environmental services and an urban multi-modal transportation system as urban development occurs within the Springfield UGB.

27. The coordinated, timely provision of urban services is a central element of the City's comprehensive growth management strategy for infill, redevelopment and new development. Development undertaken in pursuit of housing goals, diversifying the economy and neighborhood livability shall occur only after the logical and efficient delivery of all urban services have been provided to these sites.
 - Prepare and adopt comprehensive plan and zoning updates at the neighborhood, district, and corridor scale to determine the density, character and design of urban development in alignment with infrastructure capacity to ensure efficient and economical delivery of urban services in balance with the City's financial resources.
28. Regionally significant public investments within Springfield's UGB shall be planned on a metropolitan-wide basis, as described in the regional transportation and public facilities plans.
29. Annexation shall continue to be a prerequisite for urban development and the delivery of City services in accordance with the Springfield Comprehensive Plan and Springfield Development Code.

30. Unincorporated land within the Springfield UGB may be developed with permitted uses at maximum density only upon annexation to the City when it is found that key urban facilities and services can be provided to the area to be annexed in an orderly and efficient manner. Provision of these services to the area proposed for annexation is consistent with the timing and location for such extension, where applicable, in the City' infrastructure plans — such as the Public Facilities and Services Plan; the Springfield Transportation System Plan; the City's Capital Improvement Program; and the urbanization goals, policies and implementation strategies of this Element — or a logical time within which to deliver these services has been determined, based upon demonstrated need and budgetary priorities.
31. For the purposes of land use planning and annexation approval, the Springfield Comprehensive Plan defines key urban facilities and services as: wastewater service; stormwater service; transportation; solid waste management; water service; fire and emergency medical services; police protection; citywide park and recreation programs; electric service; land use controls; communication facilities; and public schools on a district-wide basis.²⁶
32. Urban services provided by the City upon annexation to Springfield include storm and sanitary sewer; water; transportation systems; police and fire protection; planning, building, code enforcement and library services; and public infrastructure maintenance of City-owned or operated facilities.
33. Springfield Utility Board (SUB) is the water service provider within the Springfield City Limits. SUB will be the electrical service provider within the UGB as provided or permitted under Oregon law.
34. When unincorporated territory within the UGB is provided with any new urban service, that service shall be provided by one of the following methods in this priority order:
 - a. Annexation to City; or
 - b. Contractual annexation agreements with City

²⁶ This plan does not address facilities and services provided by Lane County, the State of Oregon, or the Federal government, and does not preclude provision of those services within Springfield.

35. The City shall not extend water or wastewater service outside city limits to serve a residence or business without first obtaining a valid annexation petition, a consent to annex agreement, or when a health hazard abatement annexation is required.
36. The City Council may approve construction of urban transportation and public infrastructure facilities prior to or concurrently with development proposals provided that such infrastructure construction occurs as described in the Public Facilities and Services Plan, Springfield Wastewater and Stormwater Master Plans, the regional and local transportation system plans, and the Capital Improvement Program.
- The City shall continue to seek funding opportunities and public-private partnerships to allow construction of key urban infrastructure elements to support pedestrian and transit-friendly redevelopment in Glenwood and Downtown, such as the Franklin Corridor multiway boulevard in Glenwood and enhancements to the Main Street/South A couplet through Downtown.
37. Prior to re-designating and rezoning land designated Urban Holding Area- Employment, the City shall update and adopt amendments to the *Eugene-Springfield Metropolitan Public Facilities and Services Plan* (PFSP) that may be needed to identify new facilities or major modification of facilities needed to serve development of urban employment uses within the North Gateway or Mill Race districts as necessary to demonstrate consistency with statewide planning Goal 11 and Goal 11 administrative rules requirements and the policies of Metro Plan Chapter III-G Public Facilities Element of the Metro Plan.

NOTE: Policies 40-42 are intended to address Metro Plan Chapter III-F Eugene-Springfield Metropolitan Area Transportation Element, to address the applicable Statewide planning Goal 12 and Goal 12 administrative rules requirements.

38. To ensure that changes to the Springfield Comprehensive Plan are supported by adequate planned transportation facilities, the City shall update and adopt amendments to the Springfield Transportation System Plan (TSP) to identify facilities that may be needed to provide and encourage a safe, convenient and economic multi-modal transportation system to support development of urban uses and densities in the North Gateway and Mill Race areas. The TSP update shall be coordinated with City-initiated comprehensive land use planning or owner-initiated plan amendments and shall be prepared and adopted prior to or concurrently with any plan or zoning amendment that allows an increase in trips over the levels permitted in the AG zone.

39. The North Gateway and Mill Race districts shall be planned and designed to encourage and support the availability of a variety of transportation choices for moving people that balance vehicular use with other transportation modes, including walking, bicycling and transit in order to avoid principal reliance upon any one mode of transportation; support the mobility needs of the transportation disadvantaged; and provide for safe and convenient vehicular, transit, pedestrian, and bicycle access and circulation. Plan and zoning amendments shall include a transportation system analysis and plan to demonstrate compliance with Statewide planning Goal 12 and Goal 12 administrative rules.
40. Public transportation systems shall be designed to facilitate future extension of the public transit system to serve the North Gateway district.

Note: For other related policy discussion, see the [Public Facilities and Services Element in Metro Plan Chapter III-G](#). The Springfield 2030 Comprehensive Plan Urbanization Element does not address service districts or the financing or management of services that are provided; and does not preclude dissolution, merger, expansion or creation of special districts by public agencies.

UG-4 As the City grows and as land develops, maintain and reinforce Springfield's identity as a river-oriented community by emphasizing and strengthening physical connections between people and nature in the City's land development patterns and infrastructure design.

41. Protect, conserve, and enhance the natural, scenic, environmental, and economic qualities of the McKenzie and Willamette River and waterway corridors as Springfield grows and develops.

The following policies are adapted from existing Metro Plan policies as noted. They are included here to update existing policies applicable to urbanizable lands within Springfield's UGB.

42. Land use regulations and acquisition programs along river corridors and waterways shall take into account the concerns and needs of the community, such as recreation, resource protection, wildlife habitat, enhancement of river corridor or waterway environments, potential for public access, and opportunities for river-oriented urban development and infrastructure design. ([Adapted from Greenway, River Corridors and Waterways Metro Plan D.2 p III-D-4](#))

43. The City of Springfield and Willamalane shall continue to cooperate in expanding water-related parks and other facilities, where appropriate, that allow access to and enjoyment of river and waterway corridors. (Adapted from [Greenway, River Corridors and Waterways Metro Plan D.3, p III-D-4](#))
44. New development that locates along river corridors and waterways shall be designed to enhance natural, scenic and environmental qualities of those water features. (Adapted from [Greenway, River Corridors and Waterways Metro Plan D.4, p III-D-4](#))
45. Continue efforts to restore, enhance and manage the Springfield Mill Race to fulfill multiple community objectives. Partner with Willamalane and Springfield Utility Board to provide public access to the Mill Race where appropriate. (Adapted from [Greenway, River Corridors and Waterways Metro Plan D.4, p III-D-4](#))
46. Continue efforts to provide increased opportunities for public access to the Willamette River Greenway and the McKenzie River through comprehensive planning, development standards, annexation agreements, the land use permitting process, and through partnerships with Willamalane, Springfield Utility Board and property owners.
47. Prior to approval of a plan amendment or zone change that permits urban development within the North Gateway or Mill Race District urbanizable lands, the Springfield Local Wetland Inventory shall be updated in accordance with Statewide planning Goal 5 and Goal 5 administrative rules requirements.
48. Prior to approval of a plan amendment or zone change that permits urban development within the North Gateway or Mill Race District urbanizable lands, the Springfield Natural Resources Inventory shall be updated in accordance with Statewide planning Goal 5 and Goal 5 administrative rules requirements and the Springfield Natural Resources Study shall be amended. The inventory process shall map the resource areas, determine significance, and adopt a list of significant resource sites as part of the comprehensive plan and land use regulations. More precise field surveys to locate top of bank and to monument riparian area setbacks are required prior to site plan approval and issuance of building permits.
49. Employment Lands designated UHA-E shall be planned and zoned as economic districts that provide and promote suitable sites for clean manufacturing²⁷ uses and

²⁷ For the purposes of this policy, “clean” is defined as land uses, construction practices, and business operations that minimize waste and environmental impacts, and that contribute to a safe, healthy, and clean community,

office/tech/flex employers in Springfield's target industry sectors. Limited neighborhood-scale retail uses that primarily serve employees within an industrial or office building or complex may be permitted as a secondary element within employment mixed-use zones. Urban Holding Area-Employment (UHA- E) sites shall not be re-designated or zoned to permit development of regional retail commercial uses.

50. The Springfield Water Quality Limited Waterways Map shall be updated to include the North Gateway and Mill Race Districts. Springfield's implementation measures to maintain the City's compliance with the Clean Water Act and other Federal resource protection mandates shall automatically apply to the lands included in the UGB though the provisions of the Springfield Development Code.

UG-5 Increase Springfield's capability to respond to natural hazard impacts and to enhance public safety, health and robustness of the economy and natural environment. Create opportunities for innovative urban development and economic diversification.

51. Grow and develop the City in ways that will to ensure the stability of Springfield's public drinking water supply to meet current and future needs.
- Prior to City approval of annexation, land division or site development in the North Gateway and Mill Race UHA-E districts, the City — in partnership with Springfield Utility Board — shall conduct a Springfield Development Code Amendment process to prepare and apply specialized development standards that protect Drinking Water Source Areas to urbanizable lands designated UHA-E to ensure that new development contributes to a safe, clean, healthy, and plentiful community drinking water supply. The standards shall identify design, development, construction and best management processes appropriate and necessary to maintain aquifer recharge and protect drinking water quality and quantity. The standards shall also identify land use buffers appropriate and necessary to protect the Willamette Wellfield and the surface water features that are known to be in hydraulic connection with the alluvial aquifer.
 - Continue to Update the Springfield Comprehensive Plan and Springfield Development Code as new natural hazards information becomes available.

maintain the aquifer recharge capacity of the site by reducing impervious surfaces, and protect Springfield's drinking water source areas from contamination.

- Encourage increased integration of natural systems into the built environment, such as vegetated water quality stormwater management systems and energy-efficient buildings.

52. Grow and develop the City in ways that maintain and improve Springfield's air quality to benefit public health and the environment.

- Prioritize and seek funding for mixed use land use district planning and multi-modal transportation projects that reduce reliance on single occupancy vehicles (SOVs) consistent with Springfield Transportation System Plan (TSP) Policy 1.2, 1.3 and 1.4.
- Coordinate land use and transportation system planning for urbanizable lands at the refinement plan and/or Master Plan level to identify and conceptually plan alignments for locating multi – modal facilities.
- Plan, zone and design transportation systems in the North Gateway and Mill Race Urban Holding Area - Employment districts to provide multi-modal transportation choices for district employees.
- Promote the use of active transportation systems as new growth areas and significant new infrastructure are planned and developed.

FINDINGS:**POPULATION AND EMPLOYMENT FORECASTS FOR THE 2010-2030 PLANNING PERIOD**

In order to achieve timely compliance with their statutory obligations under ORS 197.304 (2007) Or Laws Chapter 650, the cities of Eugene and Springfield and Lane County co-adopted the following coordinated population forecasts into the Metro Plan for Springfield's jurisdictional areas:

	2030	2031	2032	2033	2034	2035
Springfield – City Only	74,814	75,534	76,254	76,974	77,693	78,413
Metro Urban Area East of I-5	6,794	6,718	6,642	6,567	6,491	6,415
Total	<u>81,608</u>	<u>82,252</u>	<u>82,896</u>	<u>83,541</u>	<u>84,184</u>	<u>84,828</u>

These figures effectively provide coordinated projections for years ending 2030 through 2035 and were used as the basis for the Springfield 2030 UGB and plan policies adopted to meet residential and employment land needs for the 20-year planning period 2010-2030. The 2030 UGB relied on the 2006 employment forecast ²⁹of 13,440 new employees for Springfield in the year 2030 to project employment land needs.

LAND INVENTORIES AND ANALYSES FOR THE 2010-2030 PLANNING PERIOD

The Springfield Comprehensive Plan is supported by the following land inventories and technical analyses which are adopted as technical supplements to this Plan:

Goal 10: Springfield Residential Land and Housing Needs Analysis (acknowledged in 2011)³⁰

Goal 9: Springfield Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis (acknowledged in 2016)³¹

Definitions of constrained and unconstrained land. The land area included in the Springfield 2030 Urban Growth Boundary includes land constrained by natural features, natural hazards, natural resource protection buffers, and 230KV transmission line easements. Constraints are

²⁹ The employment forecast in the adopted Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis, Appendix C.

³⁰ Adopted as a Technical Supplement to the Springfield 2030 Residential Land Use and Housing Element

³¹ Adopted as a Technical Supplement to the Springfield 2030 Economic Element

factors that preclude land development or affect the desirability of land for development. Constraints reduce the development capacity of land.

OAR 660-009-0005(2) defines “development constraints” as factors that temporarily or permanently limit or prevent the use of land for economic development. Development constraints include, but are not limited to, wetlands, environmentally sensitive areas such as habitat, environmental contamination, slope, topography, cultural and archeological resources, infrastructure deficiencies, parcel fragmentation, or natural hazard areas. Assumptions about constraints affect the amount of suitable, buildable land in the City’s inventories, and thus the amount of land Springfield needs to designate to meet housing and employment needs for the planning period. Table 1 shows constraints that were considered unbuildable for the purpose of the 2010-2030 land inventories.

Table 6: Development Constraints Springfield 2030 Comprehensive Plan Land Inventories (2010-2030)	
<p style="text-align: center;">Assumed Constraints Employment Land³²</p> <p><u>Absolute Development Constraints.</u> The following factors are considered absolute development constraints which make employment land <u>unsuitable</u> for development:</p> <ul style="list-style-type: none"> ▪ Floodway ▪ Wetlands ▪ Riparian resource areas ▪ Slopes greater than 15% <p>Springfield’s Natural Resources Inventory and Lane County Rural Comprehensive Plan Natural Resources Inventory identify wetlands and riparian resource areas protected from development by City Ordinance in compliance with Goal 5, the Federal Clean Water Act and the federal Endangered Species Act.</p>	<p style="text-align: center;">Assumed Constraints Residential Land³³</p> <p><u>Unbuildable, Not Serviceable Land:</u> Tax lots or areas within tax lots with one or more of the following attributes:</p> <ul style="list-style-type: none"> ▪ Floodway ▪ Wetlands ▪ Riparian resource areas and setbacks ▪ Areas with severe landslide potential (DOGAMI map) ▪ Slopes greater than 25% ▪ Easements containing a 230KV transmission line ▪ Small irregularly shaped lots ▪ Publicly owned land

³² Springfield Commercial and Industrial Land Inventory and Economic Opportunities Analysis, page 14.

³³ Springfield Residential Land and Housing Needs Analysis, page 10, Map 3-4.

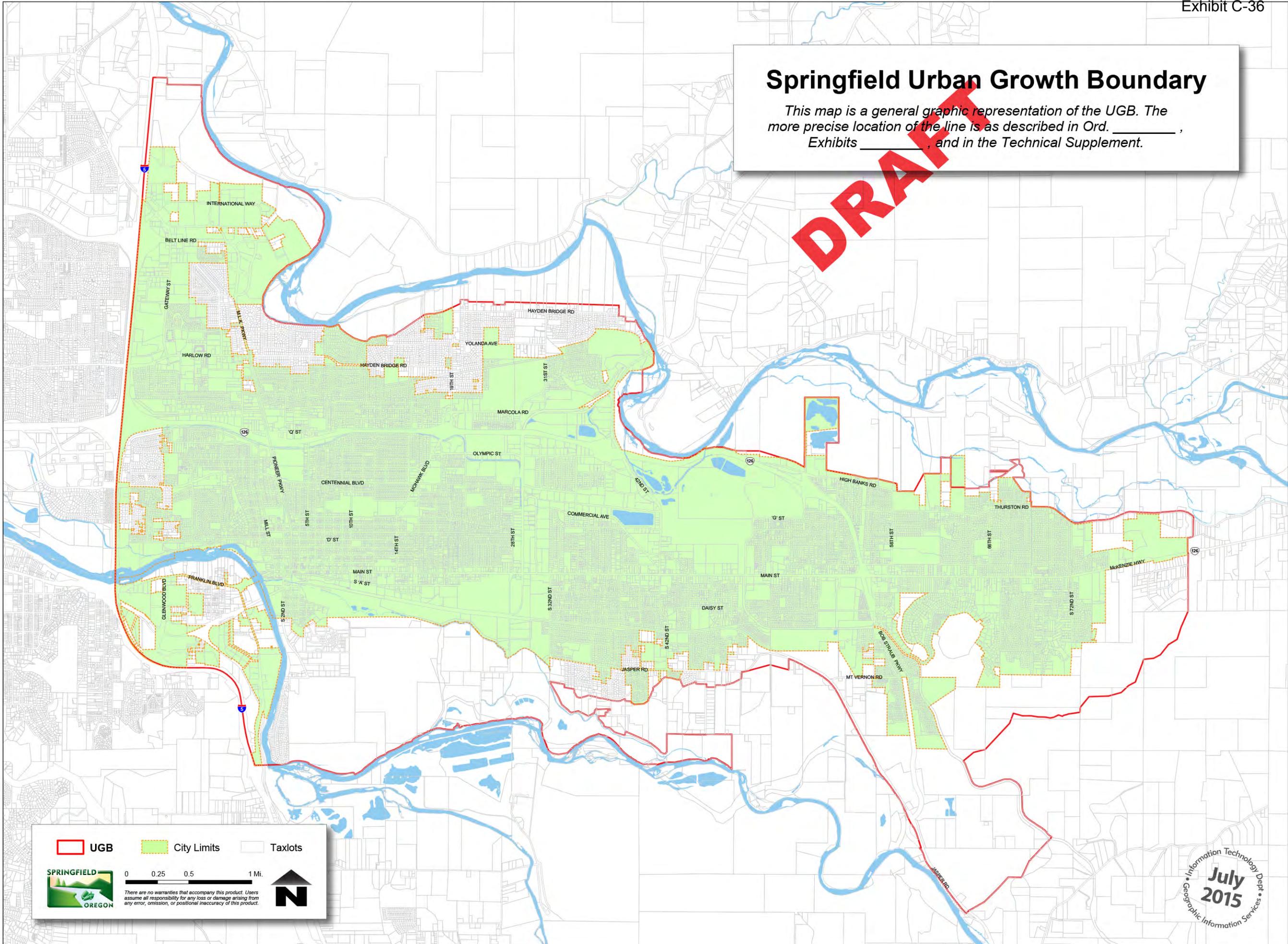
Commentary: After approval, this document will be formatted to be consistent with the Economic and Residential Elements of this Plan

DRAFT

Springfield Urban Growth Boundary

This map is a general graphic representation of the UGB. The more precise location of the line is as described in Ord. _____, Exhibits _____, and in the Technical Supplement.

DRAFT



Ordinance _____, Exhibit C-2

**Amendments to Springfield UGB Technical Supplement
Describing the Amended UGB**

The following amendments to the UGB Technical Supplement are necessary to describe the precise location of the amended UGB:

1. List of tax lots that are adjacent to and inside, or split by UGB;
2. Summary of Methodology to refine the Location of the Springfield Urban Growth Boundary

The UGB Technical Supplement previously adopted as Ordinance 6268, Exhibits D and E of is replaced with the attached documents.

Summary of Methodology Utilized to Refine the Location of the Springfield Urban Growth Boundary

Purpose of this action

1. To establish a tax lot-specific map of the acknowledged Metro Urban Growth Boundary, east of Interstate 5, in accordance with OAR 660-024-0020(2).
2. To establish a separate Urban Growth Boundary for the city of Springfield, as required by ORS 197.304.

Background & Findings

1. The Urban Growth Boundary (UGB) was originally acknowledged by the Land Conservation and Development Commission on August 19, 1982.
2. The existing map of the UGB was adopted by the Springfield City Council on May 17, 2004, by Ordinance No. 6087.
3. The tax lot-specific map of the acknowledged Metro Urban Growth Boundary, east of Interstate 5 establishes a more precise location of the UGB.
4. The methodology used to determine the precise location of the acknowledged UGB is based on the adopted policies contained in the Eugene-Springfield Metropolitan Area General Plan (Metro Plan).
5. As adopted, the UGB is only tax lot-specific where it is coterminous with city limits, where it has been determined through the annexation process, and where it falls on the outside edge of existing or planned rights-of-way. (Page II-G-14 of the Metro Plan).
6. Where it is not tax lot-specific, the UGB is approximately 200' wide. This is in accordance with the adopted policies in the Metro Plan as well as decisions by the Lane County Hearings Official.
 - a. Levi Landing (Journal #1997-06-142 & #1999-06-144) is the only area where a more precise location of the UGB east of I5 has been determined by the Lane County Hearings Official.
 - b. Letter from Steve Gordon, dated June 29, 1999.
 - c. The best evidence that identifies the location of the UGB in the SE Hills is:
 - i. The city attorney and city staff endorsed the location of the ridgeline separating the drainage basins, as proposed in Journal #2000-06-128, Dilbeck, and
 - ii. The Springfield Planning Commission found the legal description contained in Journal #1998-11-256, Smejkal, accurately describes a portion of the UGB in the southeast hills.
7. Where the UGB description refers to the "Line of Ordinary High Water", this means the line on the bank or shore to which the high water ordinarily rises annually in season. This definition is per ORS 274.005(3).

Methodology

1. OAR 660-024-0020(2): “The UGB and amendments to the UGB must be shown on the city and county plan and zone maps at a scale sufficient to determine which particular lots or parcels are included in the UGB. Where a UGB does not follow lot or parcel lines, the map must provide sufficient information to determine the precise UGB location.”
 - a. This OAR requires the UGB to be shown at a scale that identifies which particular tax lots are included in the UGB. If a tax lot is split by the UGB, there must be sufficient information to determine the precise UGB location.
 - b. Where the UGB does not follow tax lot lines, a written description shall provide sufficient information to determine the precise UGB location. This information is contained in the table called: “Tax lots Adjacent and Split by the UGB”
2. The UGB is coincident with tax lot lines unless the tax lot line is outside the 200’ wide area.
3. The UGB is coincident with tax lot lines when they are coterminous with the outside edge of rights-of-way, so the full width of the right-of-way is inside the UGB.
4. Roads and Rights of Way. The UGB shall lie along the outside edge of existing and planned rights-of-way that form a portion of the UGB so that the full right-of-way is within the UGB. Refer to Policy #2, Page II-C-4 of the Metro Plan.
5. The location of the UGB in relation to the Interstate 5 corridor is based on the policies contained in “Jurisdictional Responsibility” on Page II-D of the Metro Plan:

“The division of responsibility for metropolitan planning between the two cities is the Interstate 5 Highway. Lane County jurisdiction is between the urban growth boundary (UGB) and *Metro Plan* Plan Boundary (Plan Boundary); and the county has joint responsibility with Eugene between the city limits and UGB west of the Interstate 5 Highway and with Springfield between the city limits and UGB east of the Interstate 5 Highway. State law (1981) provides a mechanism for creation of a new city in the River Road and Santa Clara area. Refer to Metro Plan Chapter IV and intergovernmental agreements to resolve specific issues of jurisdiction.”

 - a. **General description.** The northbound lane is inside the Springfield UGB. The southbound lane is outside the Springfield UGB. For the area underneath the Willamette River Bridge, the UGB and the city limits are coincident.
 - b. **Northern terminus.** Extend the ~~nor~~southern tax lot line of 17031~~000019500001~~00 to the west until it intersects the centerline of the Interstate 5 right-of-way.
 - c. **Southern terminus.** Extend the southernmost point of tax lot 180311001800 that is south of and adjacent to the Filbert Grove 5th Addition, to the W, to the intersection of the Interstate 5 centerline and the common section line of TRS 180311 and 180310. This point is approximately 275’ south of the northbound Interstate 5 on-ramp.
 - d. **Centerline.** For the purposes of the UGB location, the centerline is located within the area between the northbound and southbound travel lanes as they are currently located. A more precise location of the current centerline is included in the following metes and bounds description. If the travel lanes are shifted and

the metes and bounds description conflicts with the new travel lanes, the general description shall apply.

Beginning at the Northwest corner of the Ashley O. Stevens DLC no. 45 in Township 17 South, Range 3 West in the Willamette Meridian, thence South $83^{\circ}17'27''$ East 1025.05 feet to the centerline of Pacific highway Interstate 5; thence North $6^{\circ}38'21''$ East 1636.35 feet along said centerline to Engineers centerline station 402+01.88; thence North $6^{\circ}42'32''$ East 2934.72 feet, more or less along said centerline to Engineers centerline station 372+67.16, said station being 277.25 feet southerly along said centerline from Engineers centerline station 369+89.91 PT, as depicted on Lane County Survey maps CSF 23305 and CSF 28681, records of the Lane County Surveyors Office, in Lane County, Oregon, being the **TRUE POINT OF BEGINNING** of the herein UGB line description; thence along the centerline of said Pacific Highway Interstate 5 the following courses: South $6^{\circ}42'32''$ West 16,629.8013,695.08 feet, more or less to Engineers centerline station 538+96.95 PS; thence along a spiral curve to the left (the long chord of which bears South $4^{\circ}17'57''$ West 1213.40 feet) to Engineers centerline station 551+10.84 PT BK = 551+24.85 POT AH; thence South $1^{\circ}53'22''$ West 3690.63 feet to Engineers centerline station 588+15.62 PS; thence along a spiral curve to the left (the long chord of which bears South $9^{\circ}18'13''$ East 1505.42 feet) to Engineers centerline station 603+34.93 PT; thence South $20^{\circ}29'48''$ East 15.13 feet to Engineers centerline station 603+50.0634.93 POT BK = 202+88.88 POT AH; thence South $20^{\circ}29'48''$ East 233.64 feet to Engineers centerline station 205+22.53 PS; thence along a spiral curve to the left (the long chord of which bears South $54^{\circ}29'18''$ East 2982.07 feet) to Engineers centerline station 237+41.86 PT; thence South $88^{\circ}28'48''$ East 738.65 feet to Engineers centerline station 244+80.54 PS; thence along a spiral curve to the right (the long chord of which bears South $47^{\circ}03'03''$ East 2279.74 feet) to Engineers centerline station 266+63.16 PT; thence South $5^{\circ}37'18''$ East 1049.33 feet to Engineers centerline station 277+12.49 PS; thence along a spiral curve to the left (the long chord of which bears South $9^{\circ}31'54''$ East 1431.01 feet) to Engineers centerline station 287+45.82 PCS and there ending, all in Lane County, Oregon.

Basis of Bearings for this description is Oregon State Plane Coordinate System, South Zone, NAD 83/91 Datum.

6. Split Tax Lots. When the UGB is not coincident with tax lot lines, the criteria from the Metro Plan shall apply. The following criteria are from Page II-G-14 of the Metro Plan. The UGB shall follow the most appropriate feature:
 - a. Protection of Agricultural Lands
 - b. Protection of Forest Lands
 - c. Ridgeline (Drainage Basin)
 - d. Orderly and Economic Public Services
 - e. Floodway Fringe
 - f. Protection of Wetlands

- g. Protection of Sand and Gravel Resources
 - h. Airport Protection
 - i. Existing Development and Services (City Limits)
 - j. Meet Economic Goals
7. The following areas contain tax lots that are split by the UGB. Refer to the detail maps in the technical supplement for further clarification.
- a. **Hayden Bridge Area Split Tax Lots:** The location of the UGB is a fixed distance (300') that is measured from the northern edge of the Hayden Bridge right-of-way, unless it has been previously determined as a result of a land use decision or annexation. The location of 300' north of the right of way was chosen since it included most of the existing dwellings and was within the 200' area. In addition, the land use decisions indicated the UGB was not intended to follow the Hayden Bridge right of way.
 - b. **High Banks Area Split Tax Lots.** The location of the UGB is either:
 - A fixed distance (450') that is measured from the northern edge of the High Banks right-of-way, or
 - Coincident with the city limits.
 - c. **North Gateway Area Split Tax Lots.** Refer to the description of the UGB within the I5 corridor. The location is based on the policies contained in "Jurisdictional Responsibility" on Page II-D of the Metro Plan. ~~The UGB is coincident with the unnumbered tax lot that contains the public drainage facility. The tax lot is entirely within the UGB.~~
 - d. **Thurston Area Split Tax Lots.** The city limits extend outside the UGB on the tax lot that contains the Thurston Middle School. On that tax lot, the UGB is coincident with the section line.
 - e. **Southeast Hills Area Split Tax Lots.** The adopted policies indicate the UGB should follow the ridgeline (refer to the table "Metro Plan Urban Growth Boundary Map Key" from Page II-G-21 of the Metro plan). The line was originally drawn in 1982 and generally follows the ridgeline. The city's current mapping technology is able to more accurately follow the ridgeline. The letter from Steve Gordon, dated June 29, 1999, provides evidence of the intent to follow the ridgeline. Journal #1998-11-0256 is a land use decision that provided a legal description for a portion of this area.
 - f. **Clearwater Area Split Tax Lots:** When the UGB does not follow tax lot lines in this area, its location is based on aerial photo interpretation and proximity to the Jasper Rd. right of way. This effort also included a site visit and discussions with the landowner of 5119 Jasper Rd.
 - g. **Willamette Area Split Tax Lots:** Refer to the description of the UGB within the I5 corridor. The location is based on the policies contained in "Jurisdictional Responsibility" on Page II-D of the Metro Plan.

Description of the Springfield UGB within the Interstate 5 corridor

~~March 16, 2011~~

The location of the UGB in relation to the Interstate 5 (I-5) corridor is based on the policies contained in "Jurisdictional Responsibility" on Page II-D of the Metro Plan. It states:

"The division of responsibility for metropolitan planning between the two cities is the Interstate 5 Highway. Lane County jurisdiction is between the urban growth boundary (UGB) and *Metro Plan* Plan Boundary (Plan Boundary); and the county has joint responsibility with Eugene between the city limits and UGB west of the Interstate 5 Highway and with Springfield between the city limits and UGB east of the Interstate 5 Highway. State law (1981) provides a mechanism for creation of a new city in the River Road and Santa Clara area. Refer to Metro Plan Chapter IV and intergovernmental agreements to resolve specific issues of jurisdiction."

General description

The northbound lane is inside the Springfield UGB. The southbound lane is outside the Springfield UGB. For the area underneath the Willamette River Bridge, the UGB and the city limits are coincident.

Northern terminus

Extend the ~~norsou~~thern tax lot line of 17031~~000019500001~~00 to the west until it intersects the centerline of the Interstate 5 right-of-way.

Southern terminus

Extend the southernmost point of tax lot 180311001800 that is south of and adjacent to the Filbert Grove 5th Addition, to the W, to the intersection of the I-5 centerline and the common section line of TRS 180311 and 180310. This point is approximately 275' south of the NB I-5 onramp.

Metes and bounds description

This is a metes and bounds description of the northern and southern terminus points of the Springfield UGB within the I-5 right of way.

For the purposes of the UGB location, the centerline is located within the area between the northbound and southbound travel lanes as they are currently located. A more precise location of the current centerline is included in the following metes and bounds description. If the travel lanes are shifted and the metes and bounds description conflicts with the new travel lanes, the general description shall apply.

Beginning at the Northwest corner of the Ashley O. Stevens DLC no. 45 in Township 17 South, Range 3 West in the Willamette Meridian, thence South 83°17'27" East 1025.05 feet to the centerline of Pacific highway Interstate 5; thence North 6°38'21" East 1636.35 feet along said centerline to Engineers centerline station 402+01.88; thence North 6°42'32" East 2934.72 feet, more or less along said centerline to Engineers centerline station 372+67.16, said station being 277.25 feet southerly along said centerline from Engineers centerline station 369+89.91 PT, as depicted on Lane County Survey maps CSF 23305 and CSF 28681, records of the Lane County Surveyors Office, in Lane County, Oregon, being the **TRUE POINT OF BEGINNING** of the herein UGB line description; thence along the centerline of said Pacific Highway Interstate 5 the following courses: South 6°42'32" West ~~16,629.8013,695.08~~ feet, more or less to Engineers centerline station 538+96.95 PS; thence along a spiral curve to the left (the long chord of which bears South 4°17'57" West 1213.40 feet) to Engineers centerline station 551+10.84 PT BK = 551+24.85 POT AH; thence South 1°53'22" West 3690.63 feet to Engineers centerline station 588+15.62 PS; thence along a spiral curve to the left (the long chord of which bears South 9°18'13" East 1505.42 feet) to Engineers centerline station 603+34.93 PT; thence South 20°29'48" East 15.13 feet to Engineers centerline station 603+~~50.0634,93~~ POT BK = 202+88.88 POT AH; thence South 20°29'48" East 233.64 feet to Engineers centerline station 205+22.53 PS; thence along a spiral curve to the left (the long chord of which bears South 54°29'18" East 2982.07 feet) to Engineers centerline station 237+41.86 PT; thence South 88°28'48" East 738.65 feet to Engineers centerline station 244+80.54 PS; thence along a spiral curve to the right (the long chord of which bears South 47°03'03" East 2279.74 feet) to Engineers centerline station 266+63.16 PT; thence South 5°37'18" East 1049.33 feet to Engineers centerline station 277+12.49 PS; thence along a spiral curve to the left (the long chord of which bears South 9°31'54" East 1431.01 feet) to Engineers centerline station 287+45.82 PCS and there ending, all in Lane County, Oregon.

Basis of Bearings for this description is Oregon State Plane Coordinate System, South Zone, NAD 83/91 Datum.

**Springfield UGB within the Interstate 5 Corridor
Metes and Bounds Description (Revised August 20, 2015)**

Beginning at the Northwest corner of the Ashley O. Stevens DLC no. 45 in Township 17 South, Range 3 West in the Willamette Meridian, thence South $83^{\circ}17'27''$ East 1025.05 feet to the centerline of Pacific Highway Interstate 5; thence North $6^{\circ}38'21''$ East 1636.35 feet along said centerline to Engineers centerline station 402+01.88; thence North $6^{\circ}42'32''$ East 2934.72 feet, more or less along said centerline to Engineers centerline station 372+67.16, said station being 277.25 feet southerly along said centerline from Engineers centerline station 369+89.91 PT, as depicted on Lane County Survey maps CSF 23305 and CSF 28681, records of the Lane County Surveyors Office, in Lane County, Oregon, being the **TRUE POINT OF BEGINNING** of the herein UGB line description; thence along the centerline of said Pacific Highway Interstate 5 the following courses: South $6^{\circ}42'32''$ West 16,629.80 feet, more or less to Engineers centerline station 538+96.95 PS; thence along a spiral curve to the left (the long chord of which bears South $4^{\circ}17'57''$ West 1213.40 feet) to Engineers centerline station 551+10.84 PT BK = 551+24.85 POT AH; thence South $1^{\circ}53'22''$ West 3690.63 feet to Engineers centerline station 588+15.62 PS; thence along a spiral curve to the left (the long chord of which bears South $9^{\circ}18'13''$ East 1505.42 feet) to Engineers centerline station 603+34.93 PT; thence South $20^{\circ}29'48''$ East 15.13 feet to Engineers centerline station 603+50.06 POT BK = 202+88.88 POT AH; thence South $20^{\circ}29'48''$ East 233.64 feet to Engineers centerline station 205+22.53 PS; thence along a spiral curve to the left (the long chord of which bears South $54^{\circ}29'18''$ East 2982.07 feet) to Engineers centerline station 237+41.86 PT; thence South $88^{\circ}28'48''$ East 738.65 feet to Engineers centerline station 244+80.54 PS; thence along a spiral curve to the right (the long chord of which bears South $47^{\circ}03'03''$ East 2279.74 feet) to Engineers centerline station 266+63.16 PT; thence South $5^{\circ}37'18''$ East 1049.33 feet to Engineers centerline station 277+12.49 PS; thence along a spiral curve to the left (the long chord of which bears South $9^{\circ}31'54''$ East 1431.01 feet) to Engineers centerline station 287+45.82 PCS and there ending, all in Lane County, Oregon.

Basis of Bearings for this description is Oregon State Plane Coordinate System, South Zone, NAD 83/91 Datum.

List of tax lots that are adjacent to and inside, or split by the UGB

4/5/2011 revised 10/8/2015

Tax lot #	Status	Description	Area	Note
17-02-19	inside UGB or split by UGB	If the tax lot is split by the UGB, where is the UGB located?	name of area containing split tax lots	Plat, Survey, or land use decision
1702190000101	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	Journal #94-02-32; plat #94-P0555; CS #32200
1702190000203	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702190000300	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702190000400	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702190000500	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702190000501	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702190000601	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702190000699	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702190000701	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	SUB2003-00014; Plat #2004- PO1787
1702190000800	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702190000900	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	Journal #87-03-20; CS #28405
1702190001000	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702190001100	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702190001200	split	300' N of N edge of Hayden Bridge ROW	Hayden Bridge	
1702194100101	in			
1702194100102	in			
1702194100200	in			
1702194100300	in			
1702194100800	in			
1702194100900	in			
1702194100901	in			
1702194100902	in			
1702194102900	in			
17-02-20				
1702200000500	in	tax lot line, city limits and UGB are coincident		
1702200000600	in	tax lot line, city limits and UGB are coincident		
1702200000700	in	tax lot line, city limits and UGB are coincident		
1702200000800	in	tax lot line, city limits and UGB are coincident		
1702200001301	in	tax lot line, city limits and UGB are coincident		

Tax lot #	Status	Description	Area	Note
17-02-27				
1702270000901	split	City limits and UGB are coincident	Highbanks	
1702270000902	split	City limits and UGB are coincident	Highbanks	
1702270001002	split	connect the most northerly NE corner of tax lot 1702342200100 to NW corner of tax lot 1702342100400.	Highbanks	
1702270001004	in			
1702270001101	in			
1702270001102	in			
1702270001502	in			
1702270002002	in			
1702270002100	in			
17-02-28				
1702280000101	split	UGB and city limits are coincident	Highbanks	split by city limits
1702280000102	in			
1702280000300	split	UGB and city limits are coincident	Highbanks	split by city limits
1702280000301	in			
1702280000302	in			
1702280000401	in	UGB, city limits and tax lot lines are coincident		
1702280000402	in			
1702280000405	in			
1702280000406	in	UGB, city limits and tax lot lines are coincident		
1702280000500	split	450' N of the N edge of Highbanks ROW, then coincident with city limits east of tax lot 1702280000600	Highbanks	
1702280000600	in	UGB, city limits and tax lot lines are coincident		
1702284300200	in			
1702284300202	in	UGB, city limits and tax lot lines are coincident		
1702284300203	in			
1702284301308	in	UGB, city limits and tax lot lines are coincident		
1702284301309	in	UGB, city limits and tax lot lines are coincident		
17-02-29				
1702290002800	split	450' N of Highbanks ROW on the eastern lot line; connect to NE corner of tax lot 1702290002900	Highbanks	
1702290002900	split	Multi-part tax lot. Extend the UGB from tax lot 2800 to the W, coincident with tax lot line 2900 until it intersects the N edge of the ROW of I-105	Highbanks	
1702290002901	in	all of the tax lot, including all adjacent side channels of the McKenzie River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the left bank (as facing downstream) of the main channel of the McKenzie River		
1702290003100	split	UGB and city limits are coincident	Highbanks	

Tax lot #	Status	Description	Area	Note
17-02-30				
1702300000401	in	all of the tax lot, including all adjacent side channels of the McKenzie River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the left bank (as facing downstream) of the main channel of the McKenzie River		
17-02-34				
1702341107900	in	UGB, city limits and tax lot lines are coincident		
1702341108000	in	UGB, city limits and tax lot lines are coincident		
1702341108100	in	UGB, city limits and tax lot lines are coincident		
1702341108200	in	UGB, city limits and tax lot lines are coincident		
1702341108300	in	UGB, city limits and tax lot lines are coincident		
1702341109000	in	UGB, city limits and tax lot lines are coincident		
1702341109100	in	UGB, city limits and tax lot lines are coincident		
1702341114900	in	UGB, city limits and tax lot lines are coincident		
1702341115000	in	UGB, city limits and tax lot lines are coincident		
1702341115100	in	UGB, city limits and tax lot lines are coincident		
1702341115200	in	UGB, city limits and tax lot lines are coincident		
1702341115300	in	UGB, city limits and tax lot lines are coincident		
1702341115400	in	UGB, city limits and tax lot lines are coincident		
1702341115500	split	split by city limits. Only "leg" portion is inside	Hayden Bridge	UGB formally interpreted in Levi Landing (#97-06-142); refer to plats of Levi Landing
1702341200100	in	UGB, city limits and tax lot lines are coincident		
1702341200500	split	Split by section line 170227 & 170234	Thurston	city limits outside UGB, Thurston Middle School
1702342100400	in	UGB, city limits and tax lot lines are coincident	Thurston	
1702342200100	in			
17-02-35				
1702352204801	in			
1702352204900	split	split by city limits	Thurston	
17-02-36				
1702362000403	in	UGB, city limits and tax lot lines are coincident on most easterly tax lot line		
1702362400102	in			
1702362400200	in			
1702363000100	in			
1702363002900	in			
1702363003200	in			
1702363003300	in			
1702363003400	in			

Tax lot #	Status	Description	Area	Note
1702363003402	in			
17-03-10				
1703100002400	split	split by I-5		
17-03-14				
1703140000900	in			
1703140001100	in	Adjacent to McKenzie River. Refer to survey		Riverbend Phase 2 (survey)
1703140001900	in	Adjacent to McKenzie River. Refer to survey		Riverbend Phase 2 (survey)
17-03-15				
1703154000400	in	all of the tax lot, including all adjacent side channels of the McKenzie River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the left bank (as facing downstream) of the main channel of the McKenzie River	Gateway	
17-03-22				
1703220003700	in	UGB, city limits and tax lot lines are coincident		
1703220004102	in	Adjacent to McKenzie River. Refer to plat.		Riverbend Phase 2 (survey)
17-03-23				
1703233200100	in			
1703233200200	in			
1703233200300	in			
1703233200400	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 1st Addition
1703233202400	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 1st Addition
1703233202600	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 1st Addition
1703233202700	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 1st Addition
1703233202800	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 1st Addition
1703233203200	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 3rd Addition
1703233203300	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 3rd Addition
1703233203400	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 3rd Addition
1703233203700	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 3rd Addition
1703233203800	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 3rd Addition
1703233203900	in	Adjacent to McKenzie River. Refer to plat.		McKenzie Manor 3rd Addition
1703233400100	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle
1703233400200	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle
1703233400300	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle
1703233400400	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle
1703233405400	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 1st Addition
1703233405500	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 1st Addition
1703233405600	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 1st Addition
1703233405700	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 1st Addition
1703233405800	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 1st Addition

Tax lot #	Status	Description	Area	Note
1703233405900	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 1st Addition
1703233406000	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 1st Addition
1703233406100	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 1st Addition
1703233406200	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 1st Addition
1703233410800	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 2nd Addition
1703233410900	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 2nd Addition
1703233411000	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 2nd Addition
1703233411100	in	Adjacent to McKenzie River. Refer to plat.		Royal Delle 2nd Addition
1703234200100	in	Adjacent to McKenzie River. Refer to plat.		River Glen 3rd Addition
1703234200200	in	Adjacent to McKenzie River. Refer to plat.		River Glen 3rd Addition
1703234200300	in	Adjacent to McKenzie River. Refer to plat.		River Glen 3rd Addition
1703234200400	in	Adjacent to McKenzie River. Refer to plat.		River Glen 3rd Addition
1703234200500	in	Adjacent to McKenzie River. Refer to plat.		River Glen 3rd Addition
1703234200600	in	Adjacent to McKenzie River. Refer to plat.		River Glen 3rd Addition
1703234200700	in	Adjacent to McKenzie River. Refer to plat.		River Glen 3rd Addition
1703234300100	in			
1703234300200	in	UGB, city limits and tax lot lines are coincident		
1703234305500	in	UGB, city limits and tax lot lines are coincident		
1703234305600	in	UGB, city limits and tax lot lines are coincident		
1703234305700	in	UGB, city limits and tax lot lines are coincident		
1703234305800	in	UGB, city limits and tax lot lines are coincident		
1703234305900	in	UGB, city limits and tax lot lines are coincident		
1703234306000	in	UGB, city limits and tax lot lines are coincident		
1703234306100	in	UGB, city limits and tax lot lines are coincident		
1703234306200	in	UGB, city limits and tax lot lines are coincident		
1703234306300	in	UGB, city limits and tax lot lines are coincident		
1703234406000	in	UGB, city limits and tax lot lines are coincident		
1703234406100	in	UGB, city limits and tax lot lines are coincident		
1703234406200	in	UGB, city limits and tax lot lines are coincident		
1703234406300	in	UGB, city limits and tax lot lines are coincident		
1703234407900	in			PLA #94-11-222; CS #32540
1703234409300	in	UGB, city limits and tax lot lines are coincident		
1703234409400	in	UGB, city limits and tax lot lines are coincident		
1703234409500	in	UGB, city limits and tax lot lines are coincident		
1703234409600	in	UGB, city limits and tax lot lines are coincident		
1703234409700	in	UGB, city limits and tax lot lines are coincident		
1703234409800	in	UGB, city limits and tax lot lines are coincident		
1703234409900	in	UGB, city limits and tax lot lines are coincident		
1703234410000	in	UGB, city limits and tax lot lines are coincident		
1703234410100	in	UGB, city limits and tax lot lines are coincident		
1703234410200	in	UGB, city limits and tax lot lines are coincident		

Tax lot #	Status	Description	Area	Note
17-03-24				
1703240000101	split	260' N of the N edge of Hayden Bridge Rd ROW	Hayden Bridge	Journal #94-02-28; Plat #94-PO567; CS #32260 & 32261
1703240000102	in		Hayden Bridge	Journal #94-02-28; Plat #94-PO567; CS #32260 & 32261
1703240000103	split	260' N of the N edge of Hayden Bridge Rd ROW	Hayden Bridge	Journal #94-02-28; Plat #94-PO567; CS #32260 & 32261
1703240000104	in		Hayden Bridge	Journal #94-02-28; Plat #94-PO567; CS #32260 & 32261
1703240000300	split	375' N of the N edge of Hayden Bridge Rd ROW, include house	Hayden Bridge	
1703240000301	in			
1703240000401	split	375' N of the N edge of Hayden Bridge Rd ROW, include house	Hayden Bridge	
1703240000503	in			
1703240000507	in			
1703240000603	split	from the NE corner of the city limits on tax lot 1703243102000, then to a point 285' N of the N edge of Hayden Bridge ROW, on the east tax lot line of 1703240000603	Hayden Bridge	Journal #92-10-202 O'Niell; CS #33470 & 31021; Plat #92-P0306.
1703243100100	split	From NE corner of tax lot 1703243200301, to city limits on tax lot 1703243104000.	Hayden Bridge	
1703243100200	split	From NE corner of tax lot 1703243200301, to NW corner of city limits on tax lot 1703243100300.	Hayden Bridge	
1703243100300	split	From NE corner of tax lot 1703243200301, to NW corner of city limits on tax lot 1703243100300.	Hayden Bridge	
1703243100600	in			
1703243100701	in			
1703243100702	in			
1703243100704	in			
1703243100900	split	split by city limits	Hayden Bridge	
1703243102000	split	split by city limits, UGB and city limits are coincident	Hayden Bridge	
1703243104000	in	UGB, city limits and tax lot lines are coincident		
1703243104100	in	UGB, city limits and tax lot lines are coincident		
1703243104200	in	UGB, city limits and tax lot lines are coincident		
1703243200200	in			
1703243200301	in			
1703243200302	in			
1703243200303	in			
1703243200304	in			
1703243200305	in			
1703243200306	in			
1703243200307	in			
1703243200500	in			

Tax lot #	Status	Description	Area	Note
1703243200600	in			
1703243200700	in			
1703243200800	in			
1703243200900	in			
18-02-01				
1802010000100	split	follow ridgeline	SE Hills	
18-02-02				
1802020000100	split	follow ridgeline	SE Hills	
1802020000200	split	follow ridgeline	SE Hills	
1802020000300	split	follow ridgeline	SE Hills	
1802020000400	split	follow ridgeline	SE Hills	Refer to Webb survey
1802020000401	in		SE Hills	
18-02-03				
1802030000600	in	follow ridgeline	SE Hills	
18-02-04				
1802040003000	split	approximately 450' S of Jasper Rd to a property corner, then W to the drainage ditch on the W property line. The house and barn at 5119 Jasper Rd are inside the UGB.	Clearwater	
18-02-05				
1802050001801	in			
1802050002600	split	Panhandle; 400' S of the S edge of the Jasper Rd. ROW	Clearwater	
1802050002800	split	On the E lot line 450' S of the S edge of Jasper Rd. ROW. On the W tax lot line 220' S of the S edge of Jasper Rd. ROW.	Clearwater	
1802050002801	split	On the E tax lot line, approximately 450' S of Jasper Rd. to the natural drainage, then to the NW corner of the tax lot. The house (4855 Jasper Rd) is outside.	Clearwater	
1802051303501	in			
1802051303600	in			
1802051303700	in			
1802051303800	in			
1802051304100	in			
1802051304101	in			
1802051304200	in			
1802052300300	in			
1802052300400	in			
1802052300403	in			
1802052300500	in			
1802052300600	in			

Tax lot #	Status	Description	Area	Note
1802052400100	in			Journal #1998-11-0255; Redwood Village plat
1802052400200	in			Journal #1998-11-0255; Redwood Village plat
1802052401000	in			Journal #1998-11-0255; Redwood Village plat
1802052401100	in			Journal #1998-11-0255; Redwood Village plat
1802052401200	in			Journal #1998-11-0255; Redwood Village plat
1802052407900	in			Journal #1998-11-0255; Redwood Village plat
1802052408000	in			Journal #1998-11-0255; Redwood Village plat
1802052408100	in			Journal #1998-11-0255; Redwood Village plat
1802052408201	in			
1802052409400	in			Journal #1998-11-0255; Redwood Village plat
1802052409600	in			Journal #1998-11-0255; Redwood Village plat
1802052409700	in			Journal #1998-11-0255; Redwood Village plat
1802052409800	in			Journal #1998-11-0255; Redwood Village plat
1802052409900	in			Journal #1998-11-0255; Redwood Village plat
1802052410000	in			Journal #1998-11-0255; Redwood Village plat
1802052411000	in			Journal #1998-11-0255; Redwood Village plat
1802052412000	in			Journal #1998-11-0255; Redwood Village plat
1802052413000	in			Journal #1998-11-0255; Redwood Village plat
18-02-06				
1802060001500	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		

Tax lot #	Status	Description	Area	Note
1802060001600	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1802060001606	in			
1802060004501	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1802060004600	in			
1802062403500	in			
1802062403501	in			
1802064104902	in			
1802064105700	in			
1802064105800	in			
1802064105900	in			
1802064106000	in			
1802064106100	in			
1802064106200	in			
1802064106300	in			
1802064114500	in			
1802064115900	in	UGB, city limits and tax lot lines are coincident; N bank of Jasper slough		fillbert meadows, LRP2005-00010; SUB2005-00062
1802064200118	in			
1802064200119	in			
1802064200120	in			
1802064200121	in			
1802064200301	in			
1802064200500	in			
1802064200501	in			
1802064200503	split	connect SW corner of tax lot 1802064200800 to SE corner of tax lot 180206420600		
1802064200600	in			
1802064200800	in			
1802064200900	in			
1802064201000	in			
1802064201101	in			
1802064201201	in			
18-02-07				

Tax lot #	Status	Description	Area	Note
1802070000801	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
18-02-08				
1802080000300	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1802080000400	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1802080000500	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1802080000600	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1802080000602	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
18-02-09				
1802090000100	split	follow ridgeline from the most southerly NE corner of tax lot, to a point along Jasper Rd, 815' from the SW corner of the tax lot	SE Hills	
1802090000600	split	panhandle; approximately 450' S of the S edge of Jasper Rd. ROW	Clearwater	
18-02-10				
1802100001600	in	UGB and tax lot lines are coincident	SE Hills	Weyerhauser Rd.
1802100000100	split	follow ridgeline	SE Hills	Refer to Webb Survey
18-02-11				
1802110000300	in	interpretation with legal description	SE Hills	Journal #1998-11-0256 contains legal description (attachment D)
1802110000400	in	interpretation with legal description	SE Hills	Journal #1998-11-0256 contains legal description (attachment D)
1802110001600	in	interpretation with legal description	SE Hills	Journal #1998-11-0256 contains legal description (attachment D)

Tax lot #	Status	Description	Area	Note
1802110001700	split	interpretation with legal description	SE Hills	Weyerhauser Rd. Journal #1998-11-0256 contains legal description (attachment D)
1802110002000	in	interpretation with legal description	SE Hills	Journal #1998-11-0256 contains legal description (attachment D)
18-02-15				
1802150000100	in	interpretation with legal description	SE Hills	Journal #1998-11-0256 contains legal description (attachment D)
18-03-01				
1803010001100	in			
1803010002700	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1803010002800	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1803010003000	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1803010003100	in			
1803010003200	in		willamette	
1803010003201	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1803010003500	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
18-03-02				
1803020000600	in			
18-03-11				
1803110000600	split	refer to description of UGB within I5 corridor	willamette	
1803110000700	split	refer to description of UGB within I5 corridor	willamette	
1803110001800	in			
18-03-12				

<i>Tax lot #</i>	<i>Status</i>	<i>Description</i>	<i>Area</i>	<i>Note</i>
1803120000500	in			
ROW/other				
Jasper Rd.	in	UGB is the S edge of the Jasper Rd ROW, include entire ROW		
Mill Race	in	the Mill Race within 18-03-01 is entirely within the UGB, UGB is top of S bank		
I-105	in	I-105 within 17-02-29 and 17-02-30 is within the UGB		
17-02-35	in	UGB is the N edge of the Thurston Rd ROW, E of 69th Street to the E lot line of 1702362400200		
18-02-06-24	in	The ROW for Garden Ave and Kintzley Ave are within the UGB		
17-02-36	in	UGB is the N edge of the Thurston Rd ROW		
I5 description		refer to methodology in adopted ordinance		

**Summary of UGB List Revisions for Mill Race Area
Revised 10/8/2015**

<i>Tax lot #</i>	<i>Status</i>	<i>Description</i>	<i>Area</i>	<i>Note</i>
	inside UGB or split by UGB	If the tax lot is split by the UGB, where is the UGB located?	name of area containing split tax lots	Plat, Survey, or land use decision

Add the following section:

18-02-05				
1802050001801	in			

Remove the following Tax Lots from the "18-02-06" section:

18-02-06				
1802060001006	in			
1802060001007	in			
1802062403600	in			

And add the following to the "18-02-06" section:

18-02-06				
1802060001500	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1802060001600	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1802060001606	in			
1802060004501	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1802064201000	in			
1802064201101	in			
1802064201201	in			

Add the following section:

18-02-07				
1802070000801	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		

Add the following section:

18-02-08				
1802080000300	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1802080000400	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		

1802080000500	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1802080000600	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1802080000602	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		

Remove the following Tax Lots from the "18-03-01" section:

18-03-01				
1803010000701	in			
1803010001301	in			
1803010003600	in			

And add the following to the "18-03-01" section:

18-03-01				
1803010002700	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1803010002800	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1803010003000	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1803010003201	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		
1803010003500	in	all of the tax lot, including all adjacent side channels of the Willamette River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the right bank (as facing downstream) of the main channel of the Willamette River		

**Summary of UGB List Revisions for North Springfield/Willamalane Parks Area
Revised 10/8/2015**

Tax lot #	Status	Description	Area	Note
	inside UGB or split by UGB	If the tax lot is split by the UGB, where is the UGB located?	name of area containing split tax lots	Plat, Survey, or land use decision

Remove the following Tax Lot from the "17-02-27" section:

17-02-27				
1702270001101	split	UGB and city limits are coincident	Thurston	

And add the following to the "17-02-27" section:

17-02-27				
1702270001101	in			
1702270001502	in			

Add the following to the "17-02-29" section:

17-02-29				
1702290002901	in	all of the tax lot, including all adjacent side channels of the McKenzie River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the left bank (as facing downstream) of the main channel of the McKenzie River		

The following section is removed:

17-02-30				
1702300000100	in	UGB, city limits and tax lot lines are coincident		
1702300000101	in	UGB, city limits and tax lot lines are coincident		
1702300000200	in	UGB, city limits and tax lot lines are coincident		
17023000002500	in	UGB, city limits and tax lot lines are coincident		

and replaced with the following section:

17-02-30				
1702300000401	in	all of the tax lot, including all adjacent side channels of the McKenzie River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the left bank (as facing downstream) of the main channel of the McKenzie River		

**Summary of UGB List Revisions for North Gateway Area
Revised 10/8/2015**

Tax lot #	Status	Description	Area	Note
	inside UGB or split by UGB	If the tax lot is split by the UGB, where is the UGB located?	name of area containing split tax lots	Plat, Survey, or land use decision

The following section is added just before the "17-03-14" section:

17-03-10				
1703100002400	split	split by I-5		

The following section is removed:

17-03-15				
170315	in	maple island slough, unknown lot #	Gateway	tax lot contains public drainage facility
1703150000801	split	City limits and UGB are coincident	Gateway	
1703150001000	in	UGB, city limits and tax lot lines are coincident		
1703154000100	in	UGB, city limits and tax lot lines are coincident		
1703154000200	in	UGB, city limits and tax lot lines are coincident		
1703154000400	split	split by city limits; mostly outside the UGB, only the "leg" portion is inside	Gateway	

and replaced with the following section:

17-03-15				
1703154000400	in	all of the tax lot, including all adjacent side channels of the McKenzie River, <u>is inside</u> , as lies upland of the Line of Ordinary High Water of the left bank (as facing downstream) of the main channel of the McKenzie River	Gateway	

Ordinance _____, Exhibit D

**Proposed amendments to Eugene-Springfield
Metropolitan Area General Plan (Metro Plan) Text**

The following amendments to the text of the Metro Plan are necessary to support the Springfield 2030 Comprehensive Plan amendments:

1. **Amendment to Chapter II, Section G. Metro Plan Land Use Designations to add a new land use designation applicable to Springfield’s jurisdictional area of responsibility: Urban Holding Area – Employment.**
2. **Amendment to Chapter II, Section G. Metro Plan Land Use Special Heavy Industrial designation page II-G- 8 to delete a Springfield–specific reference to the Natron site.**
3. **Amendment to Metro Plan Chapter II, Section G, footnote 7 to add a reference to the subject UGB amendment ordinance.**
4. **Amendment to Chapter II, Section C Metro Plan Growth Management Goals, Findings, and Policies.**
5. **Amendment to Chapter II, Section E Metro Plan Urban and Urbanizable Land.**
6. **Amendment to Chapter III, Section B Metro Plan Economic Element.**

Summary of Proposed Springfield 2030 Plan Metro Plan Text Amendments

1. Amends Chapter II, Section G. Metro Plan Land Use Designations to add a new land use designation applicable to Springfield's jurisdictional area of responsibility: Urban Holding Area – Employment. Inserts the following text on page II-G-9 after Small-scale Light Industry and before Nodal Development Area:

Land Use Designations

Urban Holding Area – Employment (not shown on Metro Plan Diagram)

The Urban Holding Area – Employment (UHA-E) designation identifies urbanizable areas within the Springfield UGB to meet Springfield's long term employment land needs for the 2010-2030 planning period. The UHA-E designation reserves an adequate inventory of employment sites, including sites 20 acres and larger, that are suitable for industrial and commercial mixed use employment uses that generate significant capital investment and job creation within — but not limited to — targeted industry sectors, business clusters and traded-sector industries identified in the most recent Springfield economic opportunities analysis and Springfield Comprehensive Plan Economic Element policies.

Lands designated UHA-E are protected from land division and incompatible interim development to maintain the land's potential for planned urban development until appropriate urban facilities and services are planned or available and annexation to Springfield can occur, as described in the Springfield Comprehensive Plan Urbanization Element. The UHA-E designation remains in effect until the appropriate employment designation is adopted through a City-initiated planning process or an owner-initiated plan amendment process.

2. Amends Chapter II, Section G. Metro Plan Land Use Special Heavy Industrial designation page II-G-8 as follows to delete a Springfield-specific reference to the Natron site:

Two areas are designated Special Heavy Industrial. Listed below are the ~~names of the two areas and~~ applicable land division standards, use limitations, and annexation and servicing provisions.

Natron Site (south of Springfield)

~~Wastewater service is not available to this area in the short term; therefore, industrial firms may be allowed to provide self-contained sewage disposal facilities subject to local, state, and federal environmental standards. Annexation to the city shall be required as a condition of development approval. Land divisions in this area shall be a minimum of 40 acres until annexation to Springfield has been assured. While industrial park development will be encouraged on this site, opportunity for the siting of industries that require large lots, such as 20 acres or more, will be reserved through the conceptual development planning and site review process.~~

3. Amends Metro Plan Chapter II, Section G, footnote 7 to add a reference to the subject UGB amendment ordinance:

⁷ The location of the Springfield UGB is graphically depicted in the Springfield Urban Growth Boundary Map and further described in the table entitled “List of tax lots which are adjacent to and inside, or split by the UGB” and the document entitled “Summary of Methodology Utilized to Refine the Location of the Springfield Urban Growth Boundary.” The table and methodology document were added to the *Metro Plan* in 2011 as part of the adoption of the City of Springfield’s city-specific UGB (through Springfield Ordinance No. 6268 and Lane County Ordinance No. PA 1274 in 2011; and revised as part of the adoption of the UGB amendment in 2016 (through Springfield Ordinance No. XXXX and Lane County Ordinance No. XXXX).

4. Amends Chapter II, Section C Metro Plan Growth Management Goals, Findings, and Policies to add the following paragraph:

C. Growth Management Goals, Findings, and Policies

Sub-chapter II-C no longer applies to Springfield. In 2016, the City of Springfield and Lane County adopted the Springfield 2030 Comprehensive Plan Urbanization Element, Ordinance No. XXXX and Lane County Ordinance No. XXXX, as Springfield’s comprehensive plan in compliance with Statewide Planning Goal 14, Urbanization. The Urbanization Element contains Springfield’s city-specific goals, policies, implementation measures and findings to address land needs for the planning period 2010-2030.

5. Amends Chapter II, Section E Metro Plan Urban and Urbanizable Land to add the following paragraph:

E. Urban and Urbanizable Land

Sub-chapter II-E no longer applies to Springfield. In 2016, the City of Springfield and Lane County adopted the Springfield 2030 Comprehensive Plan Urbanization Element, Ordinance No. XXXX and Lane County Ordinance No. XXXX, as Springfield’s comprehensive plan in compliance with Statewide Planning Goal 14, Urbanization. The Urbanization Element contains Springfield’s city-specific goals, policies, implementation measures and findings to address land needs for the planning period 2010-2030.

6. Amends Chapter III, Section B Metro Plan Economic Element to add the following paragraph:

B. Economic Element

Sub-chapter III-B no longer applies to Springfield. In 2016, the City of Springfield and Lane County adopted the Springfield 2030 Comprehensive Plan Economic Element, Ordinance No. XXXX and Lane County Ordinance No. XXXX, as Springfield’s comprehensive plan in compliance with Statewide Planning Goal 9, Economic Development. The Economic Element contains city-specific goals, policies, implementation measures and findings to addresses Springfield’s land needs for economic development and employment growth for the 2010-2030 planning period.

Ordinance _____, Exhibit E

Proposed amendments to Springfield Development Code Chapter 3 Land Use Districts establishing Section 3.2-900 Agriculture—Urban Holding Area (AG) Zoning District to implement the Urban Holding Area – Employment plan designation and Natural Resource plan designation.

CHAPTER 3 LAND USE DISTRICTS

Section 3.1-100 Official Zoning Maps

Section 3.2-100 Base Zoning Districts

Section 3.2-200 Residential Zoning Districts

Section 3.2-300 Commercial Zoning Districts

Section 3.2-400 Industrial Zoning Districts

Section 3.2-500 Medical Services Zoning District

Section 3.2-600 Mixed-Use Zoning Districts.

Section 3.2-700 Public Land and Open Space Zoning District

Section 3.2-800 Quarry and Mining Operations Zoning District

[Commentary.](#) [The Agriculture-Urban Holding Area Zoning District is added to the list of land use districts shown in Chapter 3.](#)

Section 3.2-900 Agriculture-Urban Holding Area Zoning District

Section 3.3-100 Overlay Districts

Section 3.3-200 Drinking Water Protection Overlay District

Section 3.3-300 Willamette Greenway Overlay District

Section 3.3-400 Floodplain Overlay District

Section 3.3-500 Hillside Development Overlay District

Section 3.3-600 Reserved for Future Use

Section 3.3-700 Reserved for Future Use

Section 3.3-800 Urbanizable Fringe Overlay District

Section 3.3-900 Historic Overlay District

Section 3.3-1000 Nodal Development Overlay District

Section 3.3-1100 Hospital Support Overlay District

Section 3.4-100 Plan Districts

Section 3.4-200 Glenwood Riverfront Mixed-Use Plan District

Section 3.4-300 Booth-Kelly Mixed-Use Plan District

Section 3.5-100 Refinement Plan Policies—Opus

Section 3.2-900 Agriculture—Urban Holding Area (AG) Zoning District

Subsections

3.2-905 Establishment of the AG District

3.2-910 Applicability

3.2-915 Schedule of Use Categories

3.2-920 Base Zoning Standards

3.2-930 Planning Requirements Applicable to Zoning Map Amendments

3.2-905 Establishment of the Agriculture—Urban Holding Area (AG) Zoning District

Commentary. The primary purpose of the AG Land Use Zoning District is to protect large tracts of suitable employment land within the Springfield UGB to meet Springfield's long term employment land needs for the 2010-2030 planning period. Springfield applies the AG interim zoning to lands added to the UGB in 2016 to implement 2030 Comprehensive Plan Urbanization Element policies, the Urban Holding Area-Employment (UHA-E) Metro plan designation and the Natural Resource (NR) Metro plan designation. The AG zone allows continuation of agricultural and existing lawful uses while reserving suitable land for siting future employment uses that require large sites. AG zone development standards serve to maintain the land's potential for planned urban development by regulating land division and interim uses that would impede development of urban employment uses in the future.

The City's Agriculture—Urban Holding Area District (AG) is established to protect urbanizable lands designated Urban Holding Area-Employment (UHA-E) and Natural Resource (NR) in the comprehensive plan from land division and incompatible interim development. The AG regulatory measures guide and support orderly and efficient transition from rural to urban land use to accommodate population and urban employment inside the UGB. AG standards regulate development to maintain the land's potential for planned future urban development until appropriate urban facilities and services are planned or available and annexation to Springfield can occur, as described in the Springfield Comprehensive Plan Urbanization Element. Land designated Urban Holding Area-Employment will be annexed to the city and rezoned from AG to an appropriate industrial or commercial zone at which time urban industrial and other employment uses will supersede the interim rural uses permitted in the AG District.

- A.** The AG District implements the Urban Holding Area-Employment (UHA-E) plan designation and Springfield Comprehensive Plan Urbanization Element policies by preserving an inventory of suitable employment sites — including sites 20 acres and larger — to provide opportunities for economic growth and diversification.
- B.** The AG District is applied concurrently with the UHA-E designation at the time of a Springfield Urban Growth Boundary (UGB) expansion and remains in effect until the land is designated and zoned for urban employment uses through a City or owner-initiated plan or zoning amendment process, as described in Subsection 3.2-930 Planning Requirements Applicable to Zoning Map Amendments, and as further described in the Springfield Comprehensive Plan Urbanization Element.

Commentary. In addition to implementing the Urban Holding Area-Employment plan designation, the AG District will implement the Natural Resource (NR) Metro plan designation where applied in Springfield. The NR designation is being applied to one area only: the floodway of the McKenzie River in the North Gateway UGB expansion area.

- C. The AG District implements the Natural Resource (NR) plan designation on private and publicly owned lands within the urbanizable areas to allow continuation of existing agricultural uses while supporting transition to use and management of land to for the primary benefit of values such as fish and wildlife habitat, soil conservation, watershed conservation, scenic resources, passive recreational opportunities, vegetative cover, and open space.
- D. The AG District is applied concurrently with the Natural Resource (NR) plan designation at the time of a Springfield Urban Growth Boundary (UGB) expansion, and remains in effect until the land is designated, zoned and master-planned as described in Subsection 3.2-930 Planning Requirements Applicable to Zoning Map Amendments, and as further described in the Springfield Comprehensive Plan Urbanization Element.

3.2-910 Applicability

The provisions of the AG District apply to urbanizable lands designated UHA-E or Natural Resource (NR) in the comprehensive plan.

3.2-915 Schedule of Use Categories

The AG District implements Springfield Comprehensive Plan Urbanization Element policies by limiting interim uses on urbanizable land designated Urban Holding Area – Employment to only those rural uses that will not impede future annexation, zoning and development of the land to accommodate urban employment uses and densities to meet Springfield’s long range employment land needs. The following uses are permitted in the AG District on an interim basis when developed under the applicable provisions, restrictions and exceptions specified in this Code.

“P” = PERMITTED USE subject to the standards of this Code.

“S” = SPECIAL DEVELOPMENT STANDARDS subject to special locational and/or siting standards as specified in Section 4.7-100. Note: Some uses in this category may require Site Plan Review and/or Discretionary Use approval.

“D” = DISCRETIONARY USE subject to review and analysis under Type III procedure as required in Section 5.9-100 at the Planning Commission or Hearings Official level.

Use Categories/Uses	AG
A. Allowed Interim Uses for Lands Designated Urban Holding Area- Employment	
<u>Agricultural uses including the cultivation of tree crops, plants, orchards, pasture, flower, berry and bush crops or the keeping, boarding, raising or breeding of livestock or poultry.</u>	P
<u>On-site constructing and maintaining of equipment, structures and facilities used for the activities described as farm uses. (1),(3),(4)</u>	P
<u>Preparation, storage, and marketing of the products or by-products raised on such land for human and animal use, or distributing food by donation to a local food bank or school or otherwise. (1)</u>	P
<u>Sales/Display of Produce as specified in Subsection 4.8-125. (1),(4)</u>	S
<u>Signs (5)</u>	P
Accessory Uses	
<u>Community Gardens</u>	P

Use Categories/Uses	AG
Replacement of a lawfully existing dwelling or structure as specified in Subsection 5.8-115. (2),(3)	P
Emergency Medical Hardship as specified in Section 5.10-100. (2)	P
Other Commercial Services	
Home Occupation within a lawfully existing dwelling and as specified in Subsection 4.7-165 (4)	S
Utilities and Communication	
High Impact Public Utility Facility as specified in Subsection 4.7-160	S/D
Low Impact Public Utility Facility	P

- (1)** Where farm stands are designed and used for sale of farm crops and livestock grown on the farm operation and does not include structures for banquets, public gatherings or public entertainment. "Farm crops and livestock" includes both fresh or processed farm crops and livestock grown on the farm operation.
- (2)** On parcels larger than 20 acres, replacement of a lawfully existing farm dwelling as specified in Subsection 5.8-115 shall be placed at the existing dwelling location; or at least 100 feet from the adjoining lines of property zoned EFU to minimize adverse effects on nearby farm lands outside the UGB; and in a location that does not impede future development of urban employment use or extension of urban infrastructure as shown in transportation plans, public facilities plans or master plans.
- (3)** Placement of new structures is subject to Water Quality Protection setbacks as specified in Subsection 4.3-115 and the Natural Resource Protection standards as specified in Subsection 4.3-117 where applicable.
- (4)** Proposed new uses or expansions of existing uses must demonstrate that the use will not generate vehicle trips exceeding pre-development levels.
- (5)** Signs shall not extend over a public right of way or project beyond the property line; shall not be illuminated or capable of movement; and shall be limited to 200 square feet in area.

Commentary. The list of allowed activities for lands designated Natural Resource is derived from the existing Natural Resource Protection Areas standards in SDC 4.3-117.

B. Allowed Interim Uses for Lands Designated Natural Resource (6),(7)	
Continuation of normal farm practices such as grazing, plowing, planting, cultivating and harvesting. (6)	P
Wetland and/or riparian restoration and rehabilitation activities	P
Vegetation management necessary to control invasive vegetation or to reduce a hazard to life or property.	P
Removal of non-native vegetation, if replaced with native plant species at a density that prevents soil erosion and encourages the future dominance of the native vegetation.	P
Maintenance of existing drainage ways, ditches, or other structures to maintain flows at original design capacity and mitigate upstream flooding, provided that management practices avoid sedimentation and impact to native vegetation and any spoils are be placed in uplands.	P
Waterway restoration and rehabilitation activities such as channel widening, realignment to add meanders, bank grading, terracing, reconstruction of street crossings, or water flow improvements.	P
Emergency stream bank stabilization to remedy immediate threats to life or property. (7)	P
Bioswales or similar water quality improvement projects;	P
Public multi-use paths, access ways, trails, picnic areas, or interpretive and educational displays and overlooks, including benches and outdoor furniture.	P
Utilities and Communication	
High Impact Public Utility Facility as specified in Subsection 4.7-160	S/D
Low Impact Public Utility Facility	D

- (6)** Consistent with applicable wetland or land use permits issued by Federal, State or local approving authority with jurisdiction over wetland or riparian resources, including the Water Quality Protection provisions in Subsection 4.3-115 and Section 3.3-400 Floodplain Overlay District.

(7) Federal, State or local emergency authorization may be needed for in-stream work.

3.2-920 Pre-existing and Non-conforming Uses

- A.** Continuance, expansion, modification or replacement of lawful uses existing on a property at the time of the effective date of this zone are determined and permitted as otherwise specified in Section 5.8-100 of this Code; and
- B.** The Applicant shall submit evidence to demonstrate that the expansion or modification:
- 1.** will not generate vehicle trips exceeding pre-development levels;
 - 2.** will not force a significant change in accepted farm practices on surrounding lands devoted to farm or forest use; and
 - 3.** will not significantly increase the cost of accepted farm or forest practices on surrounding lands devoted to farm or forest use.

3.2-925 Standards for Interim Development

These regulations apply to the development of interim uses as specified in Subsection 3.2-915 and 3.2-920 in the AG District.

- A.** Receive certification from the Lane County Sanitarian that any proposed wastewater disposal system meets Oregon Department of Environmental Quality (D.E.Q.) standards prior to Development Approval.
- B.** Interim uses may not be placed on a site in manner that would future development of land designated Urban Holding Area-Employment with urban employment uses.
- C.** Interim uses may not be placed on a site in manner that would impede extension of infrastructure to serve land designated Urban Holding Area-Employment from developing with urban employment uses.
- D.** To demonstrate compliance with this provision, and in addition to the special provisions listed in Table A, the Applicant shall submit a Future Development Plan that:
- 1.** Includes a brief narrative explaining the existing and proposed use of the property;
 - 2.** Indicates the proposed development footprint on a scaled plot plan of the property;
 - 3.** Limits the proposed new development footprint to ½ acre or less of the site;
 - 4.** Addresses future street connectivity as shown in the Transportation System Plan, Regional Transportation System Plan, Local Street Network Plan, Springfield Comprehensive Plan, applicable Refinement Plans and this Code;
 - 5.** Addresses the number and type of vehicle trips to be generated by the proposed use;
 - 6.** Addresses the applicable Natural Resources protection, Water Quality Limited Watercourses protection, Floodplain Overlay Development Standards, and Drinking Water Protection Overlay Development Standards of this Code.

E. Development shall utilize the following base zone development standards:

Commentary. The following standards implement 2030 Comprehensive Plan Urbanization Element policies 5-9. The property subject to the AG zone is currently zoned EFU 30 and EFU 25 by Lane County, and subject to 30-acre and 25-acre minimum parcel sizes. The AG zone retains a restriction on land division to preserve large employment sites pursuant to the City's Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis and 2030 Comprehensive Plan Economic Element policies.

The existing EFU Zone setback standards found in Lane County Chapter 16.212 (10)(a)(ii) require dwellings to be sited at least 100 feet from the adjoining lines of property zoned EFU "to minimize impacts upon nearby farm uses or to assure optimal siting of proposed dwellings to minimize adverse impacts on nearby farm and forest lands." The setback standards found in Lane County Chapter 16.212 (10)(b) require 20 foot setbacks from the right of way of a State or County road or a local access public road and 10 foot setbacks from other property lines. Larger setbacks are established for riparian corridors. Other similar codes to the AG zone — such as the City of Redmond for Urban Holding-10 acre zone — require 50-foot front and rear yard setbacks and 10-foot side yard setbacks, and establish a maximum building height of 30 feet.

<u>Minimum Lot/Parcel Sizes</u>	<u>A 50-acre minimum lot/parcel size is applied to lots/parcels 50 acres or larger. A 20-acre minimum lot/parcel size is applied to lots/parcels less than 50 acres in size. Lots/parcels less than 20 acres in size may not be further divided. (1)</u>
<u>Main Building Height</u>	<u>35 feet</u>
<u>Accessory Building Height</u>	<u>35 feet (2)</u>
<u>Building/structure Setbacks: UHA-E designated parcels 20 acres and larger</u>	<u>20 feet from State, County, City roads, streets and local access roads. At least 100 feet from the adjoining lines of property zoned EFU; and in a location that does not impede future development of urban employment use or extension of urban infrastructure as shown in transportation plans, public facilities plans or master plans.</u>
<u>Building/structure Setbacks: UHA-E designated parcels smaller than 20 acres</u>	<u>20 feet from State, County, City roads, streets and local access roads. 10 feet from other property lines.</u>
<u>Minimum Lot/Parcel Frontage</u>	<u>None</u>
<u>Minimum Lot/Parcel Depth</u>	<u>None</u>

- (1)** Exemption: Land divisions that create lots/parcels for the purpose of establishing a Natural Resource or Public/Semi-Public Parks and Open Space designation within the floodway, wetland or riparian resource portions of the site may create lots/parcels less than 20 acres within the Natural Resource or Public/Semi-Public Parks and Open Space designation portion of the parent lot/parcel.
- (2)** Water tanks, silos, granaries, barns and similar accessory structures or necessary mechanical appurtenances may exceed the minimum height standard.

3.2-930 Planning Requirements Applicable to Zoning Map Amendments

In addition to the standards, procedures and review criteria in Section 5.22-100 applicable to Zoning Map Amendments, Table 1 provides an overview of the planning procedures required prior

to rezoning land from Agriculture - Urban Holding Area (AG) to urban employment zoning designations (e.g. Employment, Employment Mixed Use, Campus Industrial, or Industrial). Table 1 shows both City and Owner-initiated planning processes.

Table 1. Pre-Development Approval Process Steps – Urban Holding Areas	
<u>City-initiated Planning Process</u>	<u>Owner-initiated Planning Process</u>
1. <u>City prepares Plan Amendment to address all applicable Statewide Planning Goals (e.g. amended or new refinement plan or district plan), Metro Plan and Springfield Comprehensive Plan policies and Springfield Development Code standards.</u>	1. <u>Applicant submits request to City to initiate amendments to the Transportation System Plan and Public Facilities and Services Plan, and other city actions that may be required prior to plan amendment approval.</u>
2. <u>City and Lane County approve Plan Amendment to amend Metro Plan and Springfield Comprehensive Plan. UHA-E designation is replaced with employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, or Industrial). AG zoning remains in effect until Master Plan and new zoning are approved.</u>	2. <u>Applicant prepares and submits Plan Amendment application to address all applicable Statewide Planning Goals, Metro Plan and Springfield Comprehensive Plan policies, and Springfield Development Code standards. Applicant proposes employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, or Industrial).</u>
3. <u>City prepares and approves Zoning Map Amendment to apply new zoning districts (e.g. Industrial, Campus Industrial, Employment Mixed Use, or Employment). Land is planned and zoned and eligible for annexation.</u>	3. <u>City and Lane County approve Plan Amendment to amend Metro Plan and Springfield Comprehensive Plan. UHA-E designation is replaced with employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, or Industrial). AG zoning remains in effect until Master Plan and new zoning are approved.</u>
4. <u>Applicant prepares and submits Preliminary Master Plan and annexation applications with demonstration of key urban service provision.</u>	4. <u>Applicant prepares and submits Preliminary Master Plan, proposed zoning and demonstration of key urban services provision. Applicant submits annexation application.</u>
5. <u>City approves City approves Master Plan and annexation.</u>	5. <u>City approves Master Plan and Zoning Map Amendment and annexation.</u>
6. <u>Applicant submits Site Plan, Subdivision and other applicable development applications.</u>	6. <u>Applicant submits Site Plan, Subdivision etc. development applications.</u>

Ordinance _____, Exhibit F

**Springfield 2030 Plan Amendments
Staff Report and Draft Findings**

Staff Report and Draft Findings

Springfield 2030 Metro Plan Amendments

July 28, 2016

Co-applicants:	Local File Numbers:
City of Springfield Lane County	Springfield File Nos. LRP 2009-00014, TYP 413-00007 Lane County File Nos. PA 509-PA13-05393
<p>Request:</p> <p>Amend the Eugene-Springfield Metropolitan Area General Plan (<i>Metro Plan</i>) to adopt the Springfield 2030 UGB amendment; assign plan designations and zoning to newly urbanizable lands; adopt Springfield 2030 Comprehensive Plan Economic and Urbanization policy elements and implementing zoning to establish Springfield’s employment land supply for the planning period 2010-2030.</p> <p>Metro Plan Type II Amendment</p>	<p>Procedure Type:</p> <p>This proposal contains an amendment of the UGB by a city with a population of 2,500 or more that adds more than 50 acres. Pursuant to ORS 197.626 (1)(b), OAR 660-024-0080, OAR 660-025-0175, and ORS 197.610 reviewed by LCDC OAR 660-025-0175 (1)(b), the 2030 Plan amendments are submitted to the Department and Commission for review for compliance with the applicable statewide planning goals, statutes and rules.</p> <p>The proposal was initiated on December 31, 2009 and was prepared to address the requirements of the applicable statutes and rules in effect at that time, including</p> <ul style="list-style-type: none"> • ORS 197.298 • HB 4126 • Goal 14 ef. April 28, 2006 OAR 660-015-0000(14) • Division 24 Urban Growth Boundaries cert. ef. 4-16-09 <p>TYP 413-00007 (Agriculture Zoning District) was initiated on November 14, 2013</p>

I. Nature of the Plan Amendment Request

The City of Springfield and Lane County seek approval of Springfield’s evaluation of employment land needs for the planning period 2010-2030. ORS 197.304 (HB 3337) required the establishment of separate Urban Growth Boundaries (UGBs) for Eugene and Springfield and was the impetus for initiating Springfield’s 2030 comprehensive planning work. Springfield’s current UGB was acknowledged in 2011 to provide land to meet the city’s housing needs for the planning period. All of Springfield’s 2010-2030 residential growth needs were met without expanding the UGB — through re-designation of land in the Glenwood redevelopment area and other efficiency measures.

The proposed Springfield-Lane County 2030 Plan Amendments include the following actions:

- Adopt Exhibit B Springfield 2030 Comprehensive Plan Economic Element and its Technical Supplement — the Springfield Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis (CIBL/EOA) — as Springfield’s comprehensive plan in compliance with Statewide Planning Goal 9, Economic Development. The Economic Element contains city-specific goals, policies, implementation measures and findings to address Springfield’s land needs for economic development and employment growth for the 2010-2030 planning period, replacing *Metro Plan* Economic Element policies applicable to lands within Springfield’s jurisdictional area;
- Adopt Exhibit C-1 Springfield 2030 Comprehensive Plan Urbanization Element as Springfield’s comprehensive plan in compliance with Statewide Planning Goal 14, Urbanization. The Urbanization Element contains Springfield’s city-specific goals, policies, implementation measures and findings to address land needs for the planning period 2010-2030, replacing *Metro Plan* Urbanization and Growth Management policies applicable to lands within Springfield’s jurisdictional area;
- Adopt Exhibit C-1 and C-2 amending Springfield Urban Growth Boundary (UGB),¹ Springfield UGB map and UGB Technical Supplement depicting and describing the UGB. Amend Metro Plan Boundary to be coterminous with the UGB. (Lane County will amend the Lane County Rural Comprehensive Plan (RCP) boundary to be coterminous with the UGB and Metro Plan Boundary to reflect the boundary change.)
 - Expands the Springfield UGB to add approximately 257 suitable acres of employment land on 273 gross acres in two expansion areas – North Gateway and Mill Race.
 - Expands the Springfield UGB to include approximately 455 acres of existing public land, parks and open space.
- Adopt Exhibit D amending Metro Plan text:
 - Amend Chapter II, Section C Metro Plan Growth Management Goals, Findings, and Policies to add the following paragraph: “Sub-chapter II-C no longer applies to Springfield. In 2016, the City of Springfield and Lane County adopted the Springfield 2030 Comprehensive Plan Urbanization Element, Ordinance No. XXXX and Lane County Ordinance No. XXXX, as Springfield’s comprehensive plan in compliance with Statewide Planning Goal 14, Urbanization. The Urbanization

¹ All references in this report to amendment of “Springfield UGB”, “UGB amendments” or “UGB expansion” also reference concurrent amendments to the Metro Plan boundary and Lane Rural Comprehensive Plan Boundary to be coterminous with the amended Springfield UGB.

Element contains Springfield’s city-specific goals, policies, implementation measures and findings to address land needs for the planning period 2010-2030.”

- Amend Chapter II, Section E Metro Plan Urban and Urbanizable Land to add the following paragraph: “Sub-chapter II-E no longer applies to Springfield. In 2016, the City of Springfield and Lane County adopted the Springfield 2030 Comprehensive Plan Urbanization Element, Ordinance No. XXXX and Lane County Ordinance No. XXXX, as Springfield’s comprehensive plan in compliance with Statewide Planning Goal 14, Urbanization. The Urbanization Element contains Springfield’s city-specific goals, policies, implementation measures and findings to address land needs for the planning period 2010-2030.”
 - Amend Metro Plan Chapter III, Section B Metro Plan Economic Element to add the following paragraph: “Sub-chapter III-B no longer applies to Springfield. In 2016, the City of Springfield and Lane County adopted the Springfield 2030 Comprehensive Plan Economic Element, Ordinance No. XXXX and Lane County Ordinance No. XXXX, as Springfield’s comprehensive plan in compliance with Statewide Planning Goal 9, Economic Development. The Economic Element contains city-specific goals, policies, implementation measures and findings to address Springfield’s land needs for economic development and employment growth for the 2010-2030 planning period.”
 - Amend Metro Plan Chapter II, Section G Land Use Designations to add a new land use designation applicable to Springfield’s jurisdictional area of responsibility — the Urban Holding Area-Employment (UHA-E) plan designation;
 - Amend Metro Plan Chapter II, Section G. Metro Plan Land Use Special Heavy Industrial designation page II-G-8 to delete the Springfield-specific reference to the Natron Special Heavy Industrial (SHI) site; and
 - Amend Metro Plan Chapter II, Section G, footnote 7, to add a reference to the subject UGB amendment ordinance.
- Adopt Exhibit A amending Metro Plan Diagram² to assign Metro Plan designations to lands added to the UGB:

² The Metro Plan boundary, Lane Rural Comprehensive Plan boundary and Lane County plan and zoning maps are amended concurrently to reflect the amended UGB, plan and zoning designations shown in Exhibit A and C.

- Assign the “Urban Holding Area – Employment” (UHA-E) Metro plan designation to approximately 273 acres to meet Springfield’s long range employment land need for 7 employment sites on 223 suitable unconstrained acres;
- Assign the “Natural Resource” (NR) Metro plan designation to approximately 53 acres of land within the McKenzie River Floodway in the North Gateway area;
- Assign the “Public/Semi Public” (P/SP) Metro plan designation to approximately 455 acres of existing publicly-owned land, parks and open space.
- Adopt Exhibit E amending Springfield Development Code Chapter 3 Land Use Districts establishing Section 3.2-900 Agriculture—Urban Holding Area (AG) Zoning District to implement the Urban Holding Area – Employment plan designation and Natural Resource plan designation.
- Adopt Exhibit A-3 amending Springfield Zoning Map to assign Springfield zoning to lands added to UGB
 - Assign Agriculture—Urban Holding Area Zoning District to lands designated Urban Holding Area- Employment (UHA-E) and Natural Resource (NR);
 - Assign Public Land and Open Space (PLO) Zoning District to lands designated Public/Semi Public.

This proposal also requires concurrent actions by Lane County to amend the Lane County Rural Comprehensive Plan. These actions are addressed in Lane County’s staff report File No. XXXX

- Amend Lane County Rural Comprehensive Plan boundary to be coterminous with the UGB and Metro Plan Boundary to reflect the boundary change.
- Amend Lane County’s plan designation and zoning maps to reflect the 2030 Plan Metro Plan Diagram and Springfield Zoning Map amendments.

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The proposed 2030 Plan amendments (2030 Plan) implement ORS 197.707 *“to enhance economic development and opportunity for the benefit of all citizens”*; and the Land Conservation and Development Commission’s requirements for comprehensive plans pursuant to ORS 197.712: *“in carrying out statewide comprehensive land use planning, the provision of adequate opportunities for a variety of economic activities throughout the state is vital to the health, welfare and prosperity of all the people of the state.”*

The 2030 Plan addresses the comprehensive planning requirements in ORS 197.712(2)(a)-(d) by adopting city-specific comprehensive plan elements including: (a) the Springfield Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis — the required analysis of Springfield’s economic patterns, potentialities, strengths and deficiencies as they relate to state and national trends; (b) the Springfield 2030 Comprehensive Plan Economic Element — containing the City’s policies concerning the economic development opportunities in the community; (c) & (d) the Springfield 2030 Comprehensive Plan Urbanization Element — containing policies, UGB Amendment, plan designations and implementing land use regulations to provide for at least an adequate 20-year supply of sites and suitable sizes, types, locations and service levels for industrial and commercial uses consistent with plan policies. As allowed by ORS 197.712(2)(g)(B), the 2030 Plan proposes a modest change to the Springfield UGB to provide reasonable opportunities for urban commercial and industrial needs over time. The City’s findings under Goals 11, 12 and 14 address the required coordination with public facilities and transportation planning.

The 2030 Plan UGB amendment, plan policies, plan designations and land use regulations implement Goal 14 Urbanization by providing urbanizable³ land in the Springfield UGB designated for urban development needs — based on a demonstrated need for employment opportunities, livability, public facilities, parks and open space for the planning period 2010-2030. The 2030 Plan identifies Springfield's economic development objectives, provides public policies to support desired outcomes, and designates a 20-year supply of suitable employment land with specific site characteristics to meet identified needs. Prior to expanding the UGB, the City conducted the thorough and complete inventory and analysis required by Goal 9 administrative rules to demonstrate that all land needs cannot reasonably be accommodated on land already inside the UGB. [OAR 660-015-0000(14)]

II. Background

Requirements for land use planning within the Eugene-Springfield Metro area were established in 2007 when the Oregon Legislature adopted House Bill 3337. ORS 197.304 (Lane County accommodation of needed housing) established a mandate requiring Springfield to determine its population's 20-year need for housing separately from Eugene and to establish a Springfield Urban Growth Boundary (UGB) to designate land to meet housing needs. Although the text of ORS 197.304 refers only to the cities' accommodation of residential land needs, the requirement for separate UGBs carries with it the implicit need for the cities to independently plan for other land needs as well, including employment growth needs, as defined by Goal 9.

Evaluation of Land Needs for 2010-2030 Planning Period. As described above, the first step to begin this compliance process was to adopt separate population forecasts into the Metro Plan (acknowledged in 2010) in order to establish the 20-year population to be used in the 2030 Plan. In 2007, Springfield began concurrent land studies (Residential Land Study and Commercial and Industrial Lands Study) to evaluate Springfield's jurisdictional area of the Metro UGB for 2010-2030 housing and employment needs. The City commenced the Springfield 2030 Plan's planning period on year 2010 to 1) mesh seamlessly with the County's adopted coordinated population forecast period; 2) to meet the City's obligation to complete the housing inventory, analysis and determination before January 1, 2010, and 3) to closely coordinate Springfield's residential and commercial and industrial land inventories and analyses processes — that would serve as the factual bases for the Springfield UGB and respective Springfield 2030 Comprehensive Plan policy elements. The planning period 2010-2030 is consistent with the requirements of OAR 660-024-0040(2)(a) and (b).

³ Goal 14: **“Urbanizable Land.** Land within urban growth boundaries shall be considered available for urban development consistent with plans for the provision of urban facilities and services. Comprehensive plans and implementing measures shall manage the use and division of urbanizable land to maintain its potential for planned urban development until appropriate public facilities and services are available or planned. [OAR 660-015-0000(14)]

Initiation of Springfield 2030 Plan Post Acknowledgement Plan and UGB Amendments. The City and Lane County jointly submitted Notice of a Proposed Change to a Comprehensive Plan or Land Use Regulation as described in OAR 660-018-0020 and OAR 660-018-0021 concerning the evaluation or amendment of the Springfield UGB to DLCD on December 31, 2009. The first evidentiary hearing was conducted jointly by the Springfield and Lane County Planning Commissions beginning on February 17, 2010 and closing on May 4, 2010. The Notice was submitted to DLCD more than 45 days prior to the hearing.

Applicability of Division 24 Rule to Springfield UGB Amendment. In 2016 HB 4126 was enacted to allow cities like Springfield that had already initiated a UGB amendment, to continue to use the administrative rules in effect at the time of initiation. Also, subsequent to initiation of the amendment, and subsequent to the first evidentiary hearing on the amendments, the Oregon legislature adopted new rules to “clarify procedures and requirements of Goal 14 regarding a local government adoption or amendment of an urban growth boundary (UGB).” Those rules went into effect January 1, 2016 and included the following provision exempting cities who had initiated UGB amendments prior to that effective date.

HB 4126 states:

“Notwithstanding ORS 197A.320, a city outside of Metro that submitted to the Director of the Department of Land Conservation and Development, pursuant to ORS 197.610, a proposed change to an acknowledged comprehensive plan or a land use regulation that included an evaluation or an amendment of its urban growth boundary, or that received approval of a periodic review work program that included a work task to amend or evaluate its urban growth boundary pursuant to ORS 197.633, prior to January 1, 2016, but did not complete the evaluation or amendment of its urban growth boundary prior to January 1, 2016 may complete the evaluation or amendment pursuant to statutes and administrative rules in effect on June 30, 2013.”

OAR 660-024-0000(4) states:

“The rules in this division adopted on December 4, 2015, are effective January 1, 2016, except that a local government may choose to not apply the amendments to rules in this division adopted December 4, 2015 to a plan amendment concerning the amendment of a UGB, regardless of the date of that amendment, if the local government initiated the amendment of the UGB prior to January 1, 2016.”

OAR 660-024-0000 (3)(b) states:

“For purposes of this rule, “initiated” means that the local government either:

(A) Issued the public notice specified in OAR 660-018-0020 for the proposed plan amendment concerning the evaluation or amendment of the UGB; or

(B) Received LCDC approval of a periodic review work program that includes a work task to evaluate the UGB land supply or amend the UGB;

(c) A local government choice whether to apply this division must include the entire division and may not differ with respect to individual rules in the division.”

The City and Lane County initiated amendment of the UGB as described in OAR 660-024-000 (3)(b)(A) and as defined in OAR 660-018-0020 prior to January 1, 2016, thus the City may choose to not apply the amendments to rules in division 24 adopted December 4, 2015 to its plan amendment concerning the amendment of a UGB. The City chose to complete its UGB amendment process under the rules in effect prior to January 1, 2016.

2030 Plan Phased Adoption Process/ 2011 Acknowledgement of Springfield UGB and Goal 10 Housing Element (ORS 197.296). Given the complexity of actions involved in the 2030 Plan proposals and the need for timely compliance with ORS 197.304⁴, Springfield chose to phase adoption of the 2030 Plan amendments. On June 20, 2011, Springfield and Lane County co-adopted amendments to the Eugene-Springfield Metro Plan (Springfield Ordinance 6268, Lane County Ordinance PA 09-6018) — the Springfield 2030 Refinement Plan Residential Land Use and Housing Element and its Technical Supplement Residential Land Use and Housing Needs Analysis (RLHNA) and a separate Springfield Urban Growth Boundary pursuant to ORS 197.304 Lane County accommodation of needed housing. The amendments were acknowledged on August 9, 2011.⁵ Prior to that action, Springfield shared a UGB with Eugene.

Springfield’s 2010-2030 Residential Growth needs were met without expanding the UGB, by adopting residential land efficiency measures into the City’s Development Code and by redesignating land for High Density Residential (HDR) mixed-use purposes to meet the identified HDR deficit. Springfield’s current UGB is based on the adopted 20-year population forecast for the urban area described in OAR 660-024-0030. Springfield’s current UGB did not address employment land needs for the 2010-2030 planning period. The subject proposal seeks approval for its evaluation of land needed for employment.

Ila. Procedural Requirements for Processing UGB Amendments

The following section of this report demonstrates compliance with the applicable procedural requirements.

⁴ The adoption of the Springfield UGB pursuant to ORS 197.304(1)(a), and a Buildable Land Inventory and Housing Needs Analysis pursuant to ORS 197.304(1)(b), came under the “notwithstanding clause” of ORS 197.304(1), which provides:

“Notwithstanding an intergovernmental agreement pursuant to ORS 190.003 to 190.130 or acknowledged comprehensive plan provisions to the contrary, [Springfield] shall meet its obligation under ORS 197.295 to 197.314 separately from any other city within Lane County.”

⁵ DLCD Notice of Adopted Amendment, DLCD File Number 012-09, July 5, 2011.

ORS 197.626(1)(b) LCDC Review Required for UGB Amendments

(1) A local government shall submit for review and the Land Conservation and Development Commission shall review the following final land use decisions in the manner provided for review of a work task under ORS 197.633 (Two phases of periodic review):

(b) An amendment of an urban growth boundary by a city with a population of 2,500 or more within its urban growth boundary that adds more than 50 acres to the area within the urban growth boundary;

Springfield — a city with a population of 2,500 or more — submitted a land use proposal that adds 792.5 acres — more than 50 acres — to the area within the urban growth boundary. Therefore, the UGB amendment is subject to ORS 197.626 (1)(b) and reviewed by LCDC. A final order of the commission under this section may be appealed to the Court of Appeals in the manner described in ORS [197.650 \(Appeal to Court of Appeals\)](#) and [197.651 \(Appeal to Court of Appeals for judicial review of final order of Land Conservation and Development Commission\)](#).

OAR 660-024-0080 LCDC Review Required for UGB Amendments

“A metropolitan service district that amends its UGB to include more than 100 acres, or a city with a population of 2,500 or more within its UGB that amends the UGB to include more than 50 acres shall submit the amendment to the Commission in the manner provided for periodic review under ORS 197.628 to 197.650 and OAR 660-025-0175.”

Springfield’s proposal is a post-acknowledgement plan amendment of the Eugene-Springfield Metropolitan Area General Plan that is “reviewed in the manner of periodic review” because it includes a UGB amendment larger than 50 acres. Springfield and Eugene staff met with former DLCD Director Richard Whitman and DLCD staff several times between 2009 and 2010 to discuss how the cities would respond to the ORS 197.304 mandate to adopt separate urban growth boundaries and to confirm the Department’s acceptance of the approach to be taken by both cities to establish and amend UGBs, consistent with each city’s jurisdictional area of responsibility as specified in the acknowledged Metro Plan. Between 2013 and 2015 City planning staff met with DLCD staff to confirm that submittal of the subject proposal is not subject to periodic review work task submittal requirements and provisions of the statutes or administrative rules applicable only to the periodic review process.

660-025-0175 Review of UGB Amendments and Urban Reserve Area Designations

“(1) A local government must submit the following land use decisions to the department for review for compliance with the applicable statewide planning goals, statutes and rules in the manner provided for review of a work task under ORS 197.633:

(b) An amendment of an urban growth boundary by a city with a population of 2,500 or more within its urban growth boundary that adds more than 50 acres to the area within the urban growth boundary;

(2) The standards and procedures in this rule govern the local government process and submittal, and department and commission review.

(3) The local government must provide notice of the proposed amendment according to the procedures and requirements for post-acknowledgement plan amendments in ORS 197.610 and OAR 660-018-0020.

(4) The local government must submit its final decision amending its urban growth boundary, or designating urban reserve areas, to the department according to all the requirements for a work task submittal in OAR 660-025-0130 and 660-025-0140.

(5) Department and commission review and decision on the submittal from the local government must follow the procedures and requirements for review and decision of a work task submittal in OAR 660-025-0085, and 660-025-0140 to 660-025-0160.”

The Springfield 2030 Plan proposal contains an amendment of the UGB by a city with a population of 2,500 or more that adds more than 50 acres. Pursuant to OAR 660-025-0175, the UGB Amendment proposal is submitted to the Department and Commission for review for compliance with the applicable statewide planning goals, statutes and rules in the manner provided for review of UGB amendments.

ORS 197.610 Submission of proposed comprehensive plan or land use regulation changes to Department of Land Conservation and Development

“(1) Before a local government adopts a change, including additions and deletions, to an acknowledged comprehensive plan or a land use regulation, the local government shall submit the proposed change to the Director of the Department of Land Conservation and Development. The Land Conservation and Development Commission shall specify, by rule, the deadline for submitting proposed changes, but in all cases the proposed change must be submitted at least 20 days before the local government holds the first evidentiary hearing on adoption of the proposed change. The commission may not require a local government to submit the proposed change more than 35 days before the first evidentiary hearing.

(3) Submission of the proposed change must include all of the following materials:

- (a) The text of the proposed change to the comprehensive plan or land use regulation implementing the plan;*
- (b) If a comprehensive plan map or zoning map is created or altered by the proposed change, a copy of the map that is created or altered;*
- (c) A brief narrative summary of the proposed change and any supplemental information that the local government believes may be useful to inform the director or members of the public of the effect of the proposed change;*
- (d) The date set for the first evidentiary hearing;”*

Springfield’s proposal includes comprehensive plan and land use regulation changes that are amendments to the acknowledged Eugene–Springfield Metro Plan, therefore the post-acknowledgement procedures of ORS 197.610 are applicable.

660-018-0020 Notice of a Proposed Change to a Comprehensive Plan or Land Use Regulation

- “(1) Before a local government adopts a change to an acknowledged comprehensive plan or a land use regulation, unless circumstances described in OAR 660-018-0022 apply, the local government shall submit the proposed change to the department, including the information described in section (2) of this rule. The local government must submit the proposed change to the director at the department’s Salem office at least 35 days before holding the first evidentiary hearing on adoption of the proposed change.*
- (2) The submittal must include applicable forms provided by the department, be in a format acceptable to the department, and include all of the following materials:*
 - (a) The text of the proposed change to the comprehensive plan or land use regulation implementing the plan, as provided in section (3) of this rule;*
 - (b) If a comprehensive plan map or zoning map is created or altered by the proposed change, a copy of the relevant portion of the map that is created or altered;*
 - (c) A brief narrative summary of the proposed change and any supplemental information that the local government believes may be useful to inform the director and members of the public of the effect of the proposed change;*
 - (d) The date set for the first evidentiary hearing;*
 - (e) The notice or a draft of the notice required under ORS 197.763 regarding a quasi-judicial land use hearing, if applicable; and*
 - (f) Any staff report on the proposed change or information that describes when the staff report will be available and how a copy may be obtained.*
- (3) The proposed text submitted to comply with subsection (2)(a) of this rule must include all of the proposed wording to be added to or deleted from the acknowledged plan or land use regulations. A general description of the proposal or its purpose, by itself, is not sufficient. For map changes, the material submitted to comply with Subsection (2)(b) must include a graphic depiction of the change; a legal description, tax*

account number, address or similar general description, by itself, is not sufficient. If a goal exception is proposed, the submittal must include the proposed wording of the exception.

(4) If a local government proposes a change to an acknowledged comprehensive plan or a land use regulation solely for the purpose of conforming the plan and regulations to new requirements in a land use statute, statewide land use planning goal, or a rule implementing the statutes or goals, the local government may adopt such a change without holding a public hearing, notwithstanding contrary provisions of state and local law, provided:

(a) The local government provides notice to the department of the proposed change identifying it as a change described under this section, and includes the materials described in section (2) of this rule, 35 days before the proposed change is adopted by the local government, and

(b) The department confirms in writing prior to the adoption of the change that the only effect of the proposed change is to conform the comprehensive plan or the land use regulations to the new requirements.

(5) For purposes of computation of time for the 35-day notice under this rule and OAR 660-018-0035(1)(c), the proposed change is considered to have been "submitted" on the day that paper copies or an electronic file of the applicable notice forms and other documents required by section (2) this rule are received or, if mailed, on the date of mailing. The materials must be mailed to or received by the department at its Salem office."

Notice of the proposed 2030 Plan amendments was initially submitted to DLCD on December 31, 2009. The first evidentiary hearing was conducted jointly by the Springfield and Lane County Planning Commissions February 17-May 4, 2010.

Notice of the proposed AG Zone development code amendment (Ordinance Exhibit E) to implement 2030 Plan policies was submitted to DLCD on November 15, 2013. The first evidentiary hearing on the AG Zone was conducted by the Springfield Planning Commission on December 18, 2013. The Commission ordered a recommendation of approval to the Springfield City Council and Lane County Board, signed December 18, 2013.⁶

In addition to the applicable forms, the submittal included the text of the proposed wording of 2030 Plan Economic and Urbanization Element text; maps graphically depicting the proposed UGB amendment; proposed wording of AG zone land use regulations; the date set for the hearing; and description of the proposed change or information describing when the staff report would be available and how a copy could be obtained.

The City and Lane County submitted a revised Form 2 Notice of a Proposed Change to a Comprehensive Plan or Land Use Regulation to DLCD on date July x, 2016. EXHIBIT X

⁶ Springfield File No. TYP413-00007

In addition to the applicable forms, the revised submittal included the text of the proposed wording of 2030 Plan Economic and Urbanization Element text; proposed wording of Metro Plan text amendments; maps graphically depicting the proposed UGB amendment, Metro Plan designations and zoning map amendments; proposed wording of AG zone land use regulations; the date set for the final hearing; Exhibit F staff report describing the proposal and draft findings. The notice contained information describing when the staff report will be available and how a copy may be obtained.

The public hearings were conducted jointly by the Springfield City Council and Lane County Board of Commissioners on September 12, 2016 and [REDACTED], 2016. Local decision dates: X and X.

Description of public hearing procedure here after completion of the local adoption proceedings and closing of the record.

The City and Lane County submitted the Form 4 Notice of Adopted Change to an Urban Growth Boundary to DLCD on [REDACTED], 2016, after the amendment was adopted by the City of Springfield and Lane County. Both ordinances were attached to DLCD Form 4. EXHIBIT X AND X

The local record compiled after completion of the local adoption proceedings and closing of the record exceeds 2,000 pages. The submittal includes a detailed index listing all items in the local record and indicating whether or not the item is included in the submittal. EXHIBIT X

As required under OAR 660-025-0130, all items in the local record are made available for public review during the period for submitting objections under OAR 660-025-0140. The director or commission may require a local government to submit any materials from the local record not included in the initial submittal.

On date X, 2016, the City mailed notice of the decision to a list of persons who participated in local hearings or requested notice of final decision in writing. The mailed notice used sample text provided for local government notice on page 3 of DLCD Form 4 "Sample Notice to Local Parties", and included the content required by OAR 660-025-0140. EXHIBIT X

The submittal includes a list of persons who participated in local hearings or requested notice of final decision in writing. EXHIBIT X

On date X, the City and Lane County submitted the Form 4 Notice of Adopted Change to an Urban Growth Boundary that includes all materials listed on the Form 4 checklist, in compliance with OAR 660-025-0130.

Conclusion. The City and Lane County provided notice of the proposed UGB amendment according to the applicable procedures and requirements for UGB and comprehensive plan amendments.

IIb. Procedural Requirements for Processing City-specific Metro Plan Amendments

Procedural requirements for processing *Metro Plan* amendments are described in *Metro Plan* Chapter IV. The amendment procedures found in Chapter IV are implemented through each jurisdiction's local land use codes. Sections 5.2-115 Notice, 5.14-135 and 5.14-140 of the Springfield Development Code and Lane Code Sections 12.205 through 12.225 contain the amendment procedures and policies found in Chapter IV of the *Metro Plan*. Section 5.14-135 of the Springfield Development Code and Section 12.225 of the Lane Code have the same *Metro Plan* amendment criteria; consistency with the applicable Statewide Planning Goals and the proposed amendment cannot make the *Metro Plan* internally inconsistent. This staff report demonstrates that the Springfield UGB Amendment and 2030 Comprehensive Plan economic and urbanization policy elements are consistent with the applicable criteria by addressing the applicable Statewide Planning Goals.

Page iii of the Preface to the *Metro Plan* explains how Springfield, Eugene and Lane County are pursuing separate city specific comprehensive plans in order to comply with ORS 197.304. As each city develops its own city specific comprehensive plan, the *Metro Plan* will be amended several times to reflect the evolving extent to which it continues to apply to each jurisdiction. When Eugene or Springfield adopts a city-specific plan to independently address a planning responsibility that was previously addressed on a regional basis in the Metro Plan, that city will also amend the *Metro Plan* to specify which particular provisions of the Metro Plan will cease to apply within that city.

The Springfield UGB amendment and accompanying economic and urbanization elements do not make the Metro Plan internally inconsistent because this amendment also includes *Metro Plan* text amendments that inform the reader when a specific section of the Metro Plan no longer applies to Springfield because it has adopted a city specific comprehensive plan provision addressing that issue. Therefore, the Springfield UGB amendment is consistent with the *Metro Plan* amendment criteria set out in the Springfield Development Code and Lane Code that requires Metro Plan amendments to not make the *Metro Plan* internally inconsistent.

Metro Plan amended to enable Springfield and Eugene comprehensive planning. In 2014, the *Eugene-Springfield Metropolitan Area General Plan (Metro Plan)* text was amended to allow Metro jurisdictions the autonomy to make city-specific planning decisions. The amendments provide policy support for the ORS 197.304 mandate enabling Springfield and Eugene to take separate comprehensive planning actions to co-adopt (with Lane County) their respective Urban Growth Boundaries, land need determinations, comprehensive plan designations and policies. The "*Metro Plan* Enabling Amendments" were adopted by all three jurisdictions (Local file numbers Eugene: MA 14-2, Springfield: TYP414-00005, Lane Co: PA1313) and acknowledged by DLCD on December 5, 2014.

The amendments were prepared by the three Metro Plan partner jurisdictions in anticipation that Springfield and Eugene will eventually have their own city-specific comprehensive plans to address the aspects of land use planning that the cities conduct independently of one another (e.g. residential and employment land studies and policies). To support achievement of that those ends, the *Metro Plan* as revised in 2014 sets forth procedures for adopting city-specific plan changes — including UGB amendments — such as the subject proposal.

As required by Metro Plan IV-2, Policy 3, “A proposed amendment to the Metro Plan shall be classified as a Type I, Type II or Type III amendment depending upon the number of governing bodies required to approve the decision.” The subject amendment of the Metro Plan is processed as a Type II Amendment requiring approval by Springfield and Lane County, as described in Metro Plan page IV-2, Policy 5A and b:

“A Type II Amendment requires approval by two governing bodies. The governing bodies in a Type II are the home city and Lane County. Eugene is the home city for amendments west of I-5, and Springfield is the home city for amendments east of I-5:

a. Type II Diagram Amendments include:

i. Amendments to the Metro Plan Diagram for the area between a city limit and the Plan Boundary;

ii. A UGB or Metro Plan Boundary amendment east or west of I-5 that is not described as a Type III amendment.

b. Type II Text Amendments include:

i. Amendments that are non site specific and apply only to Lane County and one of the cities;⁷

ii. Amendments that have a site specific application between a city limit of the home city and the Plan Boundary;”

The subject 2030 Plan amendments to the Metro Plan include Type II diagram amendments (UGB and Metro Plan Boundary, plan designations) applicable to lands east of I-5 and text amendments applicable only to lands east of I-5.

As documented in the local record, and consistent with Sections 5.2-115 Notice, 5.14-135 and 5.14-140 of the Springfield Development Code and Lane Code Sections 12.205 through 12.225, the City initiated the amendment jointly with Lane County and notified all three governing bodies of the amendment, as required in Metro Plan IV-4, 8a. The Springfield and Lane County Planning Commissions conducted a

⁷ This includes an amendment to *Metro Plan* to specify that a particular provision does not apply within the UGB on one side of I-5, or within the Metro Plan boundary on one side of I-5, as may be the case as Eugene and Springfield consider a regional planning program that includes the adoption of city-specific comprehensive plans to address some of the land use issues that have historically been addressed in the *Metro Plan*.

joint public hearing and forwarded recommendations to their respective elected bodies as required in Metro Plan IV-4,7b. As provided in Metro Plan IV-4,10:

“...Until a city has adopted a city-specific comprehensive plan that explicitly supplants the relevant portion of the Metro Plan, that city’s refinement and functional plans must be consistent with the Metro Plan. After a city has adopted a city-specific comprehensive plan that explicitly supplants the relevant portion of the Metro Plan, that city’s refinement and functional plans must be consistent with its city-specific comprehensive plan (instead of the Metro Plan). In any case, should inconsistencies occur between the applicable comprehensive plan and a refinement or functional plan, the applicable comprehensive plan is the prevailing policy document.”

The Springfield 2030 Economic and Urbanization Elements, UGB and Metro Plan boundary amendments explicitly supplant the relevant and UGB portions of the Metro Plan as described in the subject Ordinance and in this report.

III. Applicable Statewide Planning Goals

OAR 660-015-0000

Statewide Planning Goals 1, 2, 5, 6, 7, 8, 9, 11, 12, 13, 14 and 15 are applicable to this request. Because the proposal amends the comprehensive plan to meet economic development objectives, draft findings demonstrating compliance with the Goal 9 (Economy) and Goal 14 (Urban growth boundaries) administrative rules are provided first, followed by findings for remaining applicable statewide planning goals and rules.

- **Goal 9 (Economy of the State)** applies to adoption of local economic studies such as the Springfield CIBL/EOA. The Land Conservation and Development Commission (LCDC) adopted the Economic Development administrative rule (OAR Chapter 660, Division 009) to interpret Goal 9 and ORS 197.712.
- **Goal 14 (Urbanization)** governs amendment to urban growth boundaries; the Urban Growth Boundaries administrative rule (OAR Chapter 660, Division 024) provides detailed guidance for making UGB amendments.
- **Goal 1 (Citizen Involvement) and Goal 2 (Land Use Planning)** are procedural goals that require citizen involvement in all phases of the planning process; an adequate factual base for considering alternatives courses of action; coordination among the city, county and state agencies; adoption of ultimate policy choices in the Comprehensive Plan; and consistency between the Comprehensive Plan and implementing land use regulations.
- **Goals 5 (Natural Resources), 7 (Natural Hazards), 8 (Parks and Recreation) and 15 (Willamette River Greenway)** require local governments to address wetland and riparian resource areas, regulate development within the flood plain, plan to meet park and recreational needs, and protect

the Willamette River Greenway. Wetland and riparian corridors identified in the National Local Wetland Inventory (LWI), Metro Natural Resources Study (Springfield Ordinance 6150, Lane County Ordinance PA1215) are accounted for in the suitable employment lands inventory. As noted in the Goal 5 section of this report, additional waterways and wetlands have been identified through this planning process and have been considered.

- **Goal 6 (Air, Water, and Land Resource Quality), Goal 11 (Public Facilities and Services), Goal 12 (Transportation) and Goal 13 (Energy Conservation) also apply.**
- **Goal 11 (Public Facilities and Services), Goal 12 (Transportation) and Goal 13 (Energy Conservation) also apply.** Goal 12 is implemented by the Transportation Planning Rule (OAR Chapter 660, Division 012).

Springfield's current UGB — acknowledged in 2011 — provides land to accommodate the housing needs of the projected 2010-2030 population. The proposal does not affect the residential buildable lands inventory acknowledged in 2011. No re-designation of residential land is proposed in this action. All designated residential land in the current UGB is needed to accommodate the housing needs of projected 2010-2030 population. Springfield's current proposal does not require the application of a statewide planning goal relating to buildable lands for residential use. Therefore, Goal 10 is not applicable to this proposal.

IV. Statewide Planning Goal 9: Economy of the State

OAR 660-015-0000(9)

To provide adequate opportunities throughout the state for a variety of economic activities vital to the health, welfare, and prosperity of Oregon's citizens.

The City's 2030 Plan Amendments adopt the *City of Springfield 2030 Comprehensive Plan Economic Element* (2030 Economic Element) and its Technical Supplement — the *Springfield Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis Final Report* dated August 2015 (CIBL/EOA)— as Springfield's comprehensive plan in compliance with Statewide Planning Goal 9, Economic Development.

As required under Goal 9:

Comprehensive plans and policies shall contribute to a stable and healthy economy in all regions of the state. [OAR 660-015-0000(9)] (emphasis added)

OAR 660-009-0000 Intent and Purpose

Goal 9, as implemented through the Division 9 Administrative Rules, has the following intent and purpose:

The intent of the Land Conservation and Development Commission is to provide an adequate land supply for economic development and employment growth in Oregon. The intent of this division is to link planning for an adequate land supply to infrastructure planning, community involvement and coordination among local governments and the state. The purpose of this division is to implement Goal 9, Economy of the State (OAR 660-015-0000(9), and ORS 197.712(2)(a) to (d). This division responds to legislative direction to assure that comprehensive plans and land use regulations are updated to provide adequate opportunities for a variety of economic activities throughout the state (ORS 197.712(1)) and to assure that comprehensive plans are based on information about state and national economic trends (ORS 197.717(2)). [OAR 660-009—0000] (emphasis added)

The Springfield 2030 Comprehensive Plan Economic Element (2030 Economic Element) contains Springfield-specific goals, policies, and implementation measures to address Springfield's land needs for economic development and employment growth for the 2010-2030 planning period. The 2030 Economic Element provides policy direction for updating and amending refinement plans, zoning, and development regulations to address the community's commercial, industrial and other employment development needs.

The City's 2030 Plan updates Springfield's comprehensive plan and land use regulations to provide adequate opportunities for a variety of economic activities, based on information about state and national economic trends.⁸ The 2030 Plan provides an adequate land supply in coordination with Metro regional and local infrastructure and transportation planning.

Adoption and acknowledgement of the City's 2030 Plan will support a stable and healthy economy in the Eugene-Springfield metro area region of the state⁹ by ensuring that Springfield's land supply is planned efficiently to provide sites for employment growth, based on an inventory of the land supply and an Economic Opportunities Analysis consistent with the requirements of Goal 9 and the Goal 9 administrative rule OAR 660-009.

The 2030 Plan Economic Element will, upon its acknowledgement, establish the comprehensive plan policies and land use regulations applicable to lands within Springfield's Urban Growth Boundary that are designated for commercial and industrial uses, replacing the existing, more general *Metro Plan* Chapter III, Section B Economic Element policies. The *Metro Plan* Chapter III, Section B Economic Element policies were prepared and acknowledged to address economic development at the Eugene-Springfield Metro area regional level, based on a regional factual basis, and prior to the Commission's

⁸ ECONorthwest CIBL/EOA Final Report, August 2015, Appendix A, pages 99-138 summarizes national, state, county and local trends affecting Springfield. The appendix covers recent and current economic conditions and forecast from the State Employment Department for employment growth in Lane County.

⁹ About 40% of workers residing in Springfield commute to Eugene for work. While 1/3 of Springfield's workforce lives in Springfield, Springfield is able to attract workers from Eugene and surrounding Lane County.

adoption of the Goal 9 Economic Opportunities Analysis requirements.¹⁰ The *Metro Plan* lists a single economic development goal:

“Broaden, improve, and diversify the metropolitan economy while maintaining or enhancing the environment.”

Springfield’s Economic Element planning goals, policies and implementation strategies affirm and implement this Metro Plan goal with an appropriate emphasis on maintaining and enhancing Springfield’s role, responsibility, and identity within the regional and state economies of which it is a part. The Economic Element also integrates the goals and strategies of the Regional Prosperity Economic Development Plan — approved by the Springfield, Eugene and Lane County Joint Elected Officials (JEO) in February 2010 — to acknowledge Springfield’s commitment to coordinating its land use policies with regional partners to advance creation of economic opportunities that are closely aligned with our region’s assets and values.

The 2030 Plan Economic Element lists seven Economic Development Planning Goals:

1. ***“Broaden, improve and diversify the state and regional economy, and the Springfield economy in particular, while maintaining or enhancing environmental quality and Springfield’s natural heritage.***
2. ***Support attainment of the Regional Prosperity Economic Development Plan goals for creating new metropolitan area jobs in the chosen economic opportunity areas, increasing the average annual wage and reducing unemployment.***
3. ***Strengthen and maintain strong, connected employment centers and economic corridors to support small, medium and large businesses.***
4. ***Establish, strengthen and maintain viable commercial centers to improve the community’s access to goods and services.***
5. ***Support the development of emerging economies guided by the following principles:***
 - a. ***Healthy Living—Champion businesses and entrepreneurs that promote a healthy, safe, and clean community while enhancing, protecting, and making wise use of natural resources.***
 - b. ***Ideas to Enterprise—Encourage a culture of entrepreneurship and re-investment into the local community.***
 - c. ***Regional Identity—Create a strong economic personality that celebrates our region’s attributes and values.***

¹⁰ LCDC adopted amendments to the Goal 9 administrative rule in December 2005.

- d. *Be Prepared—Contribute to development of the region’s physical, social, educational, and workforce infrastructure to meet the needs of tomorrow.*
 - e. *Local Resilience— Support businesses and entrepreneurs that lead the city and region to greater economic independence, innovation, and growth of the traded sector economies.*
6. *Encourage and facilitate community and stakeholder collaboration.*
7. *Make development decisions predictable, fair and cost-effective”*

Oregon Revised States addresses Economic Development in ORS 197.707 – 730.

ORS 197.712 (1) states:

“in carrying out statewide comprehensive land use planning, the provision of adequate opportunities for a variety of economic activities throughout the state is vital to the health, welfare and prosperity of all the people of the state.”

ORS 197.712 (2) states:

“By the adoption of new goals or rules, or the application, interpretation or amendment of existing goals or rules, the Land Conservation and Development Commission shall implement all of the following:

(a) Comprehensive plans shall include an analysis of the community’s economic patterns, potentialities, strengths and deficiencies as they relate to state and national trends.

(b) Comprehensive plans shall contain policies concerning the economic development opportunities in the community.

(c) Comprehensive plans and land use regulations shall provide for at least an adequate supply of sites of suitable sizes, types, locations and service levels for industrial and commercial uses consistent with plan policies.

(d) Comprehensive plans and land use regulations shall provide for compatible uses on or near sites zoned for specific industrial and commercial uses.”

ORS 197.717(2) states:

“(1) State agencies shall provide technical assistance to local governments in:

(a) Planning and zoning land adequate in amount, size, topography, transportation access and surrounding land use and public facilities for the special needs of various industrial and commercial uses;

(b) Developing public facility plans; and

(c) Streamlining local permit procedures.

(2) The Oregon Business Development Department shall provide a local government with “state and national trend” information to assist in compliance with ORS 197.712 (2)(a).”

To amend Springfield’s comprehensive plans and land use regulations to provide for *at least an adequate supply of sites of suitable sizes, types, locations and service levels for industrial and commercial uses consistent with plan policies*, City staff and consultant ECONorthwest requested technical assistance from state agencies including the Oregon Business Development Department (Business Oregon) to obtain “state and national trend” information to assist in compliance with ORS 197.712 (2)(a).”

The 2030 Plan proposal utilizes state and national trend information provided to the City of Springfield by the Oregon Business Development Department (Business Oregon).¹¹

As required by and consistent with the Division 9 administrative rule implementing Goal 9, ORS 197.712 (2)(a)-(d) and ORS 197.717(2), the proposal updates Springfield’s comprehensive plan and land use regulations to assure that 1) the City’s comprehensive plan includes an analysis of the community’s economic patterns, potentialities, strengths and deficiencies as they relate to state and national trends¹²; 2) the City’s comprehensive plan contains policies concerning the economic development opportunities in the community;¹³ 3) the City’s comprehensive plan and land use regulations shall provide for at least an adequate supply of sites of suitable sizes, types, locations and service levels for industrial and commercial uses consistent with plan policies;¹⁴ and 4) the City’s comprehensive plan and land use regulations¹⁵ provide for compatible uses on or near sites zoned for specific industrial and commercial uses.

The 2030 Plan proposal adopts the Springfield Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis Final Report, dated August 2015 (CIBL/EOA) into the comprehensive plan as the Technical Supplement of the Springfield 2030 Comprehensive Plan Economic Element.

OAR 660-015-0000(9)

¹¹ ECONorthwest, Springfield CIBL/EOA Final Report, August 2015, 107-108,170-174.

¹² ECONorthwest, Springfield CIBL/EOA Final Report, August 2015.

¹³ Springfield 2030 Comprehensive Plan Economic Element

¹⁴ Metro Plan Diagram, Springfield UGB, and Springfield Development Codes as amended through Springfield Ordinance [REDACTED] and Lane County Ordinance [REDACTED]

¹⁵ Springfield Development Codes as amended through Springfield Ordinance [REDACTED] and Lane County Ordinance [REDACTED]

“Comprehensive plans and policies shall contribute to a stable and healthy economy in all regions of the state.

Such plans shall be based on inventories of areas suitable for increased economic growth and activity after taking into consideration the health of the current economic base; materials and energy availability and cost; labor market factors; educational and technical training programs; availability of key public facilities; necessary support facilities; current market forces; location relative to markets; availability of renewable and non-renewable resources; availability of land; and pollution control requirements.”

The CIBL/EOA inventory and analysis document was prepared by the City’s primary consultant ECONorthwest as the factual base for the 2030 Plan Economic Element and Urbanization Element. As explained in CIBL/EOA Chapter 1, pp. 1-6, the CIBL/EOA was prepared to address the requirements of Goal 9 and Division 9. The CIBL/EOA includes an inventory of land¹⁶, an Economic Opportunities Analysis (EOA) and an economic development strategy (Appendix D). As supported by evidence in the record, the City involved the community in its process to plan for an adequate land supply for economic development as it developed the CIBL/EOA, the economic development strategy and the 2030 Economic Element goals, policies, implementation measures. As supported by evidence in the record and in this report, the 2030 Plan is based on an inventory of areas suitable for increased economic growth and activity after taking into consideration the need to improve the health of the current economic base;¹⁷ after consideration of materials and energy availability and cost;¹⁸ after consideration of labor market factors, educational and technical training programs;¹⁹ after consideration of the availability of key public facilities and necessary support facilities;²⁰ after consideration of current market forces;²¹ after consideration of location relative to markets;²² after consideration of availability of renewable and non-renewable resources;²³ after considering availability of land;²⁴ and after considering pollution control requirements.²⁵

The health of the current Springfield economic base needs improvement to increase wages. As described in CIBL/EOA page 113, income in Lane County and Springfield has historically been lower than the State or national averages. Lane County’s median household income in 2006 was \$42,127 compared with \$46,230 for Oregon and the national average of \$48,451. The median household income in Springfield in 1999 was \$33,031 or 89% of the County average of \$36,942. The average pay per employee in Lane County in 2006 was \$33,240. Additional data compiled by the 2013 Lane Livability

¹⁶ CIBL/EOA, pp. 17-39

¹⁷ CIBL/EOA Final report, Chapter 3, pp. 43-54; Appendix A, pp. 110-117; Appendix B & C pp. 139-170

¹⁸ CIBL/EOA Final report, Chapter 3, pp. 54-58.

¹⁹ CIBL/EOA Final report, Appendix B pp. 146-152.

²⁰ Ibid, pp. 142-146, and City’s Public Facilities Analyses under Goal 14

²¹ Ibid, Chapter 3, 4, Appendices A, B and C

²² Ibid, pp. 54-69

²³ Ibid, pp. 101-109

²⁴ Ibid, Chapter 2, pp. 5-41

²⁵ See City’s findings under Goal 14 Location Factors, page xxxx and Public Facilities Analyses, pp. XXXX

Consortium's *Equity and Opportunity Assessment* (work task of the Central Lane MPO HUD Sustainable Communities grant) to explain the need to increase wages in Springfield is provided in the record.²⁶

The economic sectors with above average pay and high employment were: Construction, Manufacturing, Government, and Health and Social Services. The sectors with below average pay and high employment were: Retail, Accommodations and Food Services, and Administration and Support and Waste Management.

The types of industries that Springfield wants to attract to meet its economic development objectives are: high-wage, stable jobs with benefits; jobs requiring skilled and unskilled labor; employers in a range of industries that will contribute to a diverse economy; and industries that are compatible with Springfield's community values.

ORS 197 includes provisions recognizing the fact that industrial development that provides above-average wages and employs a skilled workforce is of significance to the economic recovery of the State of Oregon.²⁷

It is the City's responsibility under Oregon law to designate land and adopt policies that will support creation of more and better economic opportunities for Springfield's citizens. The 2030 Plan considers the health of the current economic base by focusing on target industries that are well matched with the region's work force and existing employment clusters *and* industries that have higher than average wages.

The 2030 Plan maintains existing employment and commerce areas that are affordable places to start up and run locally operated small businesses (Main Street Corridor, Downtown, Mohawk), as shown in CIBL/EOA Map 2-1 areas designated for employment and commerce.

The 2030 Plan supports intensification of development and redevelopment in key areas of the City that are currently served with infrastructure (Downtown, Gateway, Mohawk, Main Street Corridor, or are immediately adjacent to existing infrastructure, transportation systems and urban services (Glenwood, North Gateway and Mill Race UGB expansion areas).

The 2030 Plan recognizes the importance of larger sites in the City's land inventory to meet the needs of target industries that have higher average wages.

The 2030 Plan considers the health of the current economic base by expanding the UGB to provide several large sites immediately adjacent to one of the City's most successful existing economic districts: Gateway/International Way.

²⁶ Livability Lane Maps, Equity & Opportunity Assessment, Part A Income & Poverty; Part B and C Socio demographic Conditions for Poverty in Latino and Minority Households; Part D Renter Households with Cost Burden; Part E Affordable Housing Access; Part F Free and Reduced Lunch Recipients; and Part G Jobs Accessible by Transit in 30 minutes, 2013.

²⁷ **Note:** Sections 1, 2, 3, 4, 5, 12 and 13, chapter 564, Oregon Laws 2011

The 2030 Plan considers the health of the current economic base by expanding the UGB to provide several large sites located in Mid-Springfield (Mill Race) that are immediately adjacent to an existing industrial district and nearby natural and recreational amenities.

The CIBL/EOA and 2030 Plan identify target industries that are matched with local resources, water, and electricity. The City's CIBL/EOA and Economic Element policies, and UGB amendment provide local employment opportunities in proximity to Springfield residents, and thus reduce vehicle miles travelled from home to work. Implementation of the City's 2030 Employment Growth Concept will increase the number and diversity of jobs within existing and planned centers, districts and corridors that are accessible to and from the regions' Frequent Transit Network, and in employment centers with proximate access to the I-5 freeway, OR 126 and rail freight corridors, thus reducing energy consumption associated with transportation. By providing more local retail and office commercial opportunities in Springfield, Springfield residents will be less likely to drive outside the area to meet these needs. By providing more employment opportunities in Springfield, residents will be closer to work and more likely to take transit, bicycle or walk to work, thus reducing household transportation cost burden and reducing energy consumption.

Chapter 5 of the CIBL/EOA discusses how materials and energy availability (pp. 102-105) and cost and buying power of markets (CIBL/EOA p. 55, and Appendix B, Table B-1, page 141) are considered. Chapter 3 (pp. 44-51, 57, 142-151) provides discussion of labor market factors, and workforce education opportunities. Availability of key public facilities and necessary support facilities is described in CIBL/EOA pp. 55-56, 142-151 and 129 Business clusters. Appendix A (p. 99-138) and Appendix B (p. 139) addresses trends, shifts in the economy and current market forces. Chapter 3, p 54-58 describes Springfield's location relative to markets. Availability of renewable and non-renewable resources is discussed p. 101-109, and 145 (water).

Availability of land is described in detail in the inventory (pp. 8-43); in the land demand analysis (pp. 59-98); and in the City's assumptions about redevelopment capacity of developed land (pp. 27-39, and 77-81) to accommodate growth through redevelopment.

The 2030 Plan is based on inventories of areas suitable for increased economic growth and activity after taking into consideration pollution control requirements. The *Metro Plan* Environmental Element addresses pollution control. Springfield provides Environmental Services programs to meet our federal and state water quality permit requirements and MWMC wastewater treatment standards. The Springfield Development Code provides protective measures for Water Quality Limited Waterways and requires pretreatment of all stormwater from development. The City is moving away from heavy industry in environmentally sensitive areas and has policies and EPA grant-funded programs in place to assist with brownfield assessment. The City Development Code has a Drinking Water Protection Overlay District to protect groundwater source areas, and Campus Industrial special standards to address pollution controls.

The 2030 Plan is based on inventories of areas suitable for increased economic growth and activity after taking into consideration the health of the current economic base; materials and energy availability and

cost; labor market factors; educational and technical training programs; availability of key public facilities; necessary support facilities; current market forces; location relative to markets; availability of renewable and non-renewable resources; availability of land; and pollution control requirements.

The referenced documents provide evidence that each factor of OAR 660-015-0000(9) was carefully considered in the City's analysis of employment land needs, its economic development vision, its policy choices, and its selection of practical and realistic implementation economic development strategies.

As stated in the CIBL/EOA p. ii-iv, the economic development strategy for Springfield can be summarized as follows:

- (1) Facilitate the redevelopment of Downtown Springfield and Glenwood through strategic infrastructure and other investments from programs such as urban renewal and planning for redevelopment.
- (2) Provide sites with a variety of site characteristics to meet both commercial and industrial economic opportunities, including providing sites that are available for relatively fast development. This includes providing large sites for major employers.
- (3) Use land within the existing urban growth boundary efficiently, through promoting redevelopment, infill development, and dense development in nodal areas. The study assumes that 46% of new employment would not require vacant land.
- (4) Provide infrastructure efficiently and fairly by coordinating capital improvement planning with economic development planning.
- (5) Support and assist existing businesses within Springfield by assessing what help businesses need and developing programs to respond to business needs.
- (6) Attract and develop new businesses, especially those related to regional business clusters. The City would like to build on the developing health care cluster, promote development of high-tech businesses, and attract sustainable businesses.
- (7) Maintain flexibility in planning through providing efficient planning services and developing flexible planning policies to respond to the changing needs of businesses.

CIBL/EOA Chapter 3 provides more detail on Springfield's comparative advantages and target industries; the Springfield Economic Development Strategy (included in Appendix D) articulates the City's economic development vision.

The 2030 Economic Element goals, policies and implementation strategies identify suitable areas for increased economic growth and activity in response to specific opportunities and challenges identified in the Springfield Commercial and Industrial Land Inventory and Economic Opportunities Analysis (CIBL/EOA). The goals, policies and implementation strategies of the 2030 Economic Element work with existing land use regulations, new land use regulations, and an amendment of the UGB to ensure that

an adequate supply of land is planned, designated and zoned to support employment and commerce for the 2010-2030 planning period.

The adopted 2030 Economic Element and Springfield Development Code regulations are consistent with the intent and purpose of Goal 9 [OAR 660-009-0000]

Goal 9 also states: *Comprehensive plans for urban areas shall:*

- “1. Include an analysis of the community's economic patterns, potentialities, strengths, and deficiencies as they relate to state and national trends;*
- 2. Contain policies concerning the economic development opportunities in the community;*
- 3. Provide for at least an adequate supply of sites of suitable sizes, types, locations, and service levels for a variety of industrial and commercial uses consistent with plan policies;*
- 4. Limit uses on or near sites zoned for specific industrial and commercial uses to those which are compatible with proposed uses.”*

Springfield Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis (CIBL/EOA). The inventory and analysis fact base for the Springfield 2030 Comprehensive Plan is contained in the Springfield Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis (CIBL/EOA) adopted as a Technical Supplement to the 2030 Comprehensive Plan Economic Element. As explained in CIBL/EOA pp. 2-ECONorthwest prepared the Springfield EOA in compliance with the Goal 9 administrative rule (OAR Chapter 660, Division 009 – Economic Development). Suitable areas for increased economic growth and activity within the existing UGB and proposed amendment to the UGB were determined through a public planning process conducted 2008-2015 (fully documented in the record).

The Final CIBL/EOA Report (Chapter 2) includes an inventory of land suitable for increased economic growth and activity. After a thorough and complete analysis, the adopted 2015 Springfield CIBL/EOA identifies the number, acreage and characteristics of sites that will be needed during the 20-year planning period to attract targeted employment opportunities and to meet their operational requirements.

The 2030 Plan proposal adopts a comprehensive plan policy element that contains policies that identify economic development opportunities in the community — the Springfield 2030 Comprehensive Plan Economic Element.

The City's Springfield 2030 Comprehensive Plan amendments to the Eugene/Springfield Metro Plan address Statewide Planning Goal 9 through a two-prong economic development strategy: 1) increasing and diversifying Springfield's inventory of suitable sites for development within the current UGB by supporting and incentivizing economic activity and redevelopment in key growth centers and

corridors with public planning and infrastructure investments; and 2) increasing and diversifying Springfield's inventory of suitable sites for new larger scale economic development and employment uses through an expansion of the UGB.

The proposal includes 1) adoption and implementation of new comprehensive plan Urbanization and Economic Element policies; and 2) an amendment of the UGB to add several suitable large employment opportunity sites. Together, these 2030 Plan public actions will support economic growth and activity in Springfield by:

- increasing the inventory of suitable land planned for a range of mixed-use, commercial, industrial and other employment uses to meet the evolving needs of a 21st economy; and
- creating improved conditions and opportunities for the commercial, industrial and mixed-use development markets to act over the 20-year planning period.

Thus, approval of this proposal and subsequent implementation of Springfield 2030 Comprehensive Plan policies will contribute to a more stable and healthy economy in the Eugene-Springfield and Southern Willamette Valley regions and contribute to Oregon's economy and livability.

OAR 660-009-0000 Conclusion. The City's 2030 Plan amendments establish a land base to support economic development opportunities in the community in compliance with Goal 9, Economy of the State.

The following findings demonstrate compliance with the Goal 9 administrative rules.

OAR 660-009-0005 Definitions states:

"For purposes of this division, the definitions in ORS chapter 197 and the statewide planning goals apply, unless the context requires otherwise. In addition, the following definitions apply:

(1) "Developed Land" means non-vacant land that is likely to be redeveloped during the planning period.

(2) "Development Constraints" means factors that temporarily or permanently limit or prevent the use of land for economic development. Development constraints include, but are not limited to, wetlands, environmentally sensitive areas such as habitat, environmental contamination, slope, topography, cultural and archeological resources, infrastructure deficiencies, parcel fragmentation, or natural hazard areas.

(3) "Industrial Use" means employment activities generating income from the production, handling or distribution of goods. Industrial uses include, but are not limited to: manufacturing; assembly; fabrication; processing; storage; logistics; warehousing; importation; distribution and transshipment; and research and development. Industrial uses may have unique land, infrastructure, energy, and transportation requirements. Industrial uses may have external impacts on surrounding uses and may cluster in

traditional or new industrial areas where they are segregated from other non-industrial activities.

(4) "Locational Factors" means market factors that affect where a particular type of industrial or other employment use will locate. Locational factors include, but are not limited to, proximity to raw materials, supplies, labor, services, markets, or educational institutions; access to transportation and freight facilities such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes; and workforce factors (e.g., skill level, education, age distribution).

(5) "Metropolitan Planning Organization (MPO)" means an organization designated by the Governor to coordinate transportation planning on urban land of the state including such designations made subsequent to the adoption of this division. The Longview-Kelso-Rainier MPO is not considered an MPO for the purposes of this division. Cities with less than 2,500 population are not considered part of an MPO for purposes of this division.

(6) "Other Employment Use" means all non-industrial employment activities including the widest range of retail, wholesale, service, non-profit, business headquarters, administrative and governmental employment activities that are accommodated in retail, office and flexible building types. Other employment uses also include employment activities of an entity or organization that serves the medical, educational, social service, recreation and security needs of the community typically in large buildings or multi-building campuses.

(7) "Planning Area" means the area within an existing or proposed urban growth boundary. Cities and counties with urban growth management agreements must address the urban land governed by their respective plans as specified in the urban growth management agreement for the affected area.

(8) "Prime Industrial Land" means land suited for traded-sector industries as well as other industrial uses providing support to traded-sector industries. Prime industrial lands possess site characteristics that are difficult or impossible to replicate in the planning area or region. Prime industrial lands have necessary access to transportation and freight infrastructure, including, but not limited to, rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes. Traded-sector has the meaning provided in ORS 285B.280.

(9) "Serviceable" means the city or county has determined that public facilities and transportation facilities, as defined by OAR chapter 660, division 011 and division 012, currently have adequate capacity for development planned in the service area where the site is located or can be upgraded to have adequate capacity within the 20-year planning period.

(10) "Short-term Supply of Land" means suitable land that is ready for construction within one year of an application for a building permit or request for service extension. Engineering feasibility is sufficient to qualify land for the short-term supply of land. Funding availability is not required. "Competitive Short-term Supply" means the short-term supply of land provides a range of site sizes and locations to accommodate the market needs of a variety of industrial and other employment uses.

(11) "Site Characteristics" means the attributes of a site necessary for a particular industrial or other employment use to operate. Site characteristics include, but are not limited to, a minimum acreage or site configuration including shape and topography, visibility, specific types or levels of public facilities, services or energy infrastructure, or proximity to a particular transportation or freight facility such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes.

(12) "Suitable" means serviceable land designated for industrial or other employment use that provides, or can be expected to provide the appropriate site characteristics for the proposed use.

(13) "Total Land Supply" means the supply of land estimated to be adequate to accommodate industrial and other employment uses for a 20-year planning period. Total land supply includes the short-term supply of land as well as the remaining supply of lands considered suitable and serviceable for the industrial or other employment uses identified in a comprehensive plan. Total land supply includes both vacant and developed land.

(14) "Vacant Land" means a lot or parcel:

(a) Equal to or larger than one half-acre not currently containing permanent buildings or improvements; or

(b) Equal to or larger than five acres where less than one half-acre is occupied by permanent buildings or improvements."

City's definition of "vacant" assumes more development can occur on developed land.

The City's CIBL/EOA p.9, Table 2-2 explains the relationship between the definitions in OAR 660-009-0005 and how land was classified in the City's inventory by the City's consultant ECONorthwest. It is important to note that the definition of vacant land used in Springfield's analysis is more inclusive than what statewide planning policy requires. The implication of using a more inclusive definition is that more land was considered available in the inventory than would be if the state definitions were used.

Thus, the City's use of the more inclusive definition of "vacant" in the inventory assumes more development can occur on developed land. Use of this definition and application of this assumption to the land inventory was vetted through the City's public involvement process, contributes to land use efficiency, and reduces the overall commercial and industrial land need.

The inventory assigns only one land classification (e.g., vacant, developed, or potentially redevelopable) for each tax lot. Each tax lot in the UGB is classified into one of the following categories:

- *Vacant land.* Tax lots that have no structures or have buildings with very little value. For the purpose of this inventory, lands with improvement values under \$10,000²⁸ are considered vacant (not including lands that are identified as having mobile homes).²⁹ Note that this definition is considerably more inclusive than what is required by OAR 660-009-0005(14). It includes all lots or parcels that are less than one half-acre and did not automatically classify lots between 0.5 and 5.0 acres as developed if they had pre-existing development. Lots in that category were visually inspected to make a determination of whether they should be classified as developed or vacant. (emphasis added)
- *Developed land.* Land that is developed at densities consistent with current zoning/plan designation and improvements that make it unlikely to redevelop during the analysis period. Lands not classified as vacant, potentially redevelopable, or public are considered developed.³⁰ Note that OAR 660-009-0005(1) uses the following definition: (1) "Developed Land" means non-vacant land that is likely to be redeveloped during the planning period. This study defines developed land as developed and defines land "likely to be redeveloped" as potentially redevelopable. Thus, the definition of developed land used for the CIBL is different (e.g., more inclusive) than the definition in the administrative rule. For purposes of the CIBL, developed land is considered committed during the 20-year period and unavailable for redevelopment. (emphasis added)
- *Potentially Redevelopable land.* Land on which development has already occurred but on which, due to present or expected market forces, there exists the potential that existing development will be converted to more intensive uses during the planning period.³¹ While Springfield expects many buildings and sites of all types to be re-used, re-purposed, revitalized and renovated throughout the city over the planning period, for the purposes of analyzing the capacity of the land base to absorb a portion of employment growth, only redevelopment that increases capacity for accommodating additional employment is a factor in this analysis. Potentially redevelopable land is a subset of developed land that was

²⁸ Improvement values were from 2008 Lane County Assessment and Taxation data and reflect the County's estimate of the market value of improvements.

²⁹ Note that this definition is more inclusive than what statewide planning policy requires. OAR 660-009-0005(14) provides the following definition: "Vacant Land" means a lot or parcel: (a) Equal to or larger than one half-acre not currently containing permanent buildings or improvements; or (b) Equal to or larger than five acres where less than one half-acre is occupied by permanent buildings or improvements. The implication of using a more inclusive definition are that more land was considered available in the inventory than would be if the state definitions were used.

³⁰ Note that OAR 660-009-0005(1) uses the following definition: (1) "Developed Land" means non-vacant land that is likely to be redeveloped during the planning period. This study defines developed land as developed and defines land "likely to be redeveloped" as potentially redevelopable.

³¹ This definition is based on the definition in OAR 660-009-0005(1).

identified using improvement to land value ratios and building coverage ratios. For the purpose of the CIBL, “potentially redevelopable” land corresponds with the definition of “developed land” as stated in OAR 660-009-0005(1) as described in Table 2-2. The City’s study included a detailed evaluation of developed land to determine its redevelopment potential. Lands that were determined to be potentially redevelopable were classified as such. (emphasis added)

Table 2-2 Relationship between land classification definitions used in the Springfield EOA and definitions in OAR 660-009-0005.

Land classification in EOA	Definition used in EOA	Related definition in OAR 660-009-0005	Implications
Vacant Land	Tax lots that have no structures or have buildings with very little value. For the purpose of this inventory, lands with improvement values under \$10,000 are considered.	(14) "Vacant Land" means a lot or parcel: (a) Equal to or larger than one half-acre not currently containing permanent buildings or improvements; or (b) Equal to or larger than five acres where less than one half-acre is occupied by permanent buildings or improvements.	Springfield included more land in the inventory than required by rule. The Stakeholder Committee believed it would provide a more accurate estimate of Total Land Supply as defined by OAR 660-009-0005(13).
Developed Land	Land that is developed at densities consistent with current zoning/plan designation and improvements that make it unlikely to redevelop during the analysis period.	(1) "Developed Land" means non-vacant land that is likely to be redeveloped during the planning period. The EOA separates the definition of developed and potentially redevelopable land.	Springfield uses a standard definition of developed—that is that the land has improvements and is committed to those uses for the planning period. The rule does not include a definition of “developed” in the standard context
Potentially Redevelopable Land	Land on which development has already occurred but on which, due to present or expected market forces, there exists the potential that existing development will be converted to <u>more intensive uses</u> (providing additional employment capacity) during the planning period. ⁷	EOA uses term “developed land” differently than OAR definition of “developed land” as “non-vacant land that is likely to be redeveloped during the planning period.” Instead the EOA uses “potentially redevelopable” to classify non-vacant land that is likely to be redeveloped during the planning period.	This category corresponds to the definition used in OAR 660-009-0005(1)

The following findings address OAR 660-009-0015 (1) and related requirements in OAR 660-009-0015 (4).

Conclusion OAR 660-009-0005: The City’s CIBL/EOA complies with the definitions set out in the Goal 9 Administrative Rules and uses a more inclusive definition of ‘vacant land’ that results in including more land in the City’s developable land inventory inside the UGB.

IVa. Economic Opportunities Analysis

OAR 660-009-0015 Economic Opportunities Analysis states:

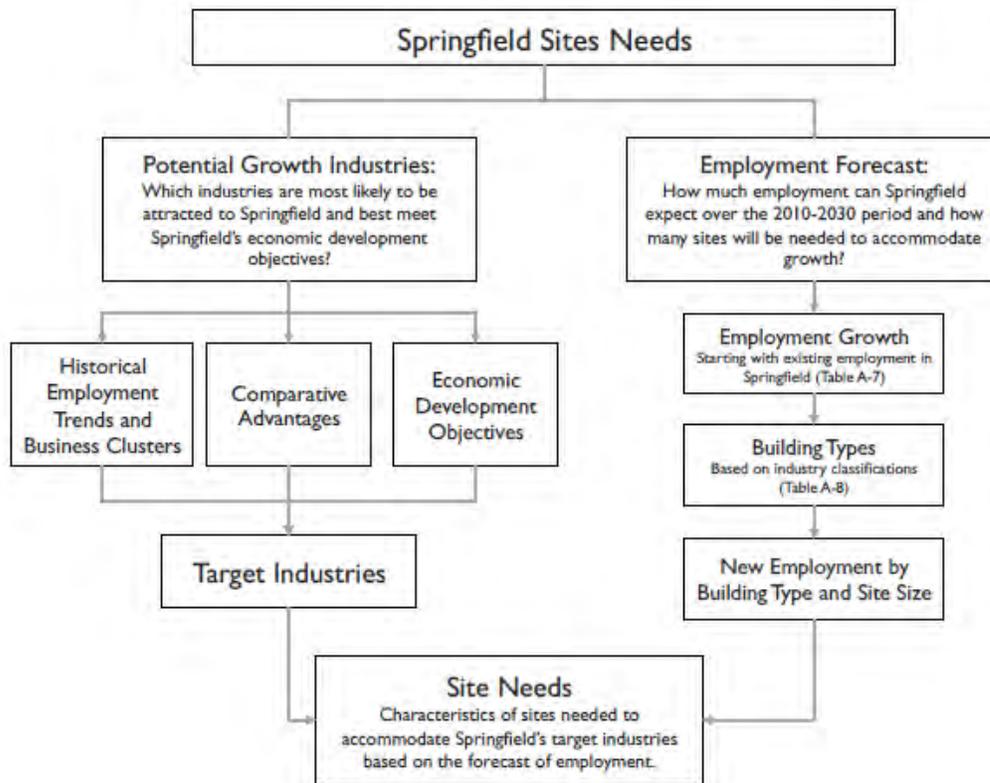
“Cities and counties must review and, as necessary, amend their comprehensive plans to provide economic opportunities analyses containing the information described in sections (1) to (4) of this rule. This analysis will compare the demand for land for industrial and other employment uses to the existing supply of such land.”

The City’s amendment to the comprehensive plan to provide an Economic Opportunities Analysis must contain the four components listed in Sections 1-4 of OAR 660-009-0015:

- Review of National, State, Regional, County and Local Trends
- Identification of Required Site Types
- Inventory of Industrial and Other Employment Lands
- Assessment of Community Economic Development Potential

CIBL/EOA Figure 4-1, p. 60 identifies how the required components of the City’s analysis are used to determine Springfield’s site needs:

Figure 4-1. Process for identifying site needs in Springfield.



Source: ECONorthwest

The City's 2030 amendments to the comprehensive plan adopted the Springfield CIBL into the comprehensive plan to address the four required components of OAR 660-009-0015. The following findings provide an overview of and references to each required component.

OAR 660-009-0015 (1) Review of National, State, Regional, County and Local Trends states:

"The economic opportunities analysis must identify the major categories of industrial or other employment uses that could reasonably be expected to locate or expand in the planning area based on information about national, state, regional, county or local trends. This review of trends is the principal basis for estimating future industrial and other employment uses as described in section (4) of this rule. A use or category of use could reasonably be expected to expand or locate in the planning area if the area possesses the appropriate locational factors for the use or category of use. Cities and counties are strongly encouraged to analyze trends and establish employment projections in a geographic area larger than the planning area and to determine the percentage of employment growth reasonably expected to be captured for the planning

area based on the assessment of community economic development potential pursuant to section (4) of this rule.”

OAR 660-009-0015 (4) Assessment of Community Economic Development Potential states:

“The economic opportunities analysis must estimate the types and amounts of industrial and other employment uses likely to occur in the planning area. The estimate must be based on information generated in response to sections (1) to (3) of this rule and must consider the planning area's economic advantages and disadvantages. Relevant economic advantages and disadvantages to be considered may include but are not limited to:

- (a) Location, size and buying power of markets;*
- (b) Availability of transportation facilities for access and freight mobility;*
- (c) Public facilities and public services;*
- (d) Labor market factors;*
- (e) Access to suppliers and utilities;*
- (f) Necessary support services;*
- (g) Limits on development due to federal and state environmental protection laws; and*
- (h) Educational and technical training programs.”*

To address OAR 660-009-0015(1) and (4), the Springfield Economic Opportunities Analysis (EOA) uses the review of national, state, regional, county and local trends and assessment of community economic development potential “to estimate the types and amounts of industrial and other employment uses likely to occur in the planning area” in Chapter 3, Chapter 4, Appendix A and Appendix B. The “planning area” is defined in OAR 660-009-0005(7) as “*the area within an existing or proposed urban growth boundary.*” For this study, the planning area is land within the Springfield UGB and the proposed expansion of the Springfield UGB. “*Locational factors for the use or category of use*” are defined in OAR 660-009-0005(4): “*Locational Factors*” means market factors that affect where a particular type of industrial or other employment use will locate. Locational factors include, but are not limited to, proximity to raw materials, supplies, labor, services, markets, or educational institutions; access to transportation and freight facilities such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes; and workforce factors (e.g., skill level, education, age distribution).

The State forecasts that employment will continue growing in Lane County at 1.4% average annual growth, compared with the State average of 1.3% average annual growth.³²

Chapter 3 and appendices A and B of the CIBL/EOA (pp. 43-58) provide data to describe economic trends and locational factors affecting future growth in Springfield. OAR 660-009-0015(1) states: “A use or category of use could reasonably be expected to expand or locate in the planning area if the area possesses the appropriate locational factors for the use or category of use.” Chapter 3 describes availability of labor, changing population demographics, incomes, workforce, economic outlook, shifts in employment, outlook for growth, and regional business activity. The growing importance of the healthcare industry is noted, due to the location of two major healthcare centers (Sacred Heart RiverBend and McKenzie Willamette) in Springfield. The continued importance of manufacturing to provide desirable above-average wage jobs is noted, accounting for 10% of employment in Springfield.³³

“Manufacturing is a traded sector industry, which brings revenue into Oregon and Lane County from outside the State. The following manufacturing industries accounted for two-thirds (\$11 billion) of revenue from exports in Oregon in 2007: Computer & Electronic Production, Transportation Equipment, Machinery Manufacturers, Chemical Manufacture, and Primary Metal Manufacturers.³⁴ These industries are all present in Lane County, accounting for 44% of manufacturing employment in the County.”³⁵

Tourism is important in Springfield’s economy. A major source of tourism spending is overnight accommodations. Between 2000 and 2008, Springfield’s lodging tax revenue varied from \$1.2 million in fiscal year 2004 to \$1.6 million in fiscal year 2007. Springfield’s transient lodging tax revenues accounted for about one-quarter of total County lodging tax revenues.³⁶ Since the City’s CIBL/EOA was prepared, several new hotels have been built in Glenwood and Gateway, and more are in the planning stages in early 2016.

Locational Factors Influencing Springfield’s Comparative Advantages. Chapter 3 pp. 54-58 provides data describing Springfield’s comparative advantages for economic development: location, availability of transportation facilities and other public facilities, quality and availability of labor, and quality of life relative to these conditions in other portions of the Lane County and southern Oregon. Springfield’s primary comparative advantages are its location on Interstate Highway 5, proximity to Eugene, access to skilled labor, cost of labor, and high quality of life. These factors make Springfield attractive to residents and businesses that want a high quality of life where they live and work. As stated in the CIBL/EOA, factors that form Springfield’s comparative advantage are summarized below and described in detail in Appendix B:

³² CIBL/EOA, p. 70-71

³³ In 2006

³⁴ “Economic Data Packet, Mary 2008,” Oregon Economic And Community Development Department

³⁵ CIBL/EOA, p. 53

³⁶ Ibid

- **“Location.** *Springfield is located in the Southern Willamette Valley, next to Eugene, between the Willamette River (to the south) and McKenzie River (to the north). Interstate 5 runs to the west of Springfield and Highway 126 runs east-west through Springfield. Springfield’s location, access to I-5 and Highway 126, and proximity to Eugene are primary comparative advantages for economic development in Springfield. These factors make Springfield attractive to businesses, especially those wanting to locate in the Willamette Valley.*
- **Buying Power of Markets.** *The buying power of Springfield and the Eugene-Springfield area forms part of Springfield’s comparative advantage by providing a market for goods and services. According to estimates on household spending by Claritas, households in Springfield are expected to spend about \$937 million in 2008, about 14% of total household expenditures in the Eugene-Springfield Region. Springfield households spend an average of \$42,700 on commonly purchased items, not including housing, Springfield’s households spent less than the regional and nation averages, with about 91% of the \$47,000 average expenditures for all households in the Eugene-Springfield MSA and 84% of national average household expenditures (Claritas, 2008).*

The buying power of households in the Eugene-Springfield region provides Springfield with a comparative advantage. Access to households in the Eugene-Springfield Region provides businesses in Springfield with greater sales potential than other, smaller cities in the Southern Willamette Valley. As the population in Springfield (and the Eugene-Springfield region) grows, Springfield will need to provide more land for firms that provide services to residents and businesses.

- **Transportation.** *Businesses and residents in Springfield have access to a variety of modes of transportation: automotive (Interstate 5, multiple State highways, and local roads); rail (Union Pacific and Amtrak); transit (LTD)³⁷; and air (Eugene Airport). Springfield has excellent automotive access for commuting and freight movement. Springfield is located along Interstate 5, the primary north-south transportation corridor on the West Coast, linking Springfield to domestic markets in the United States and international markets via West Coast ports. Springfield has developed along Highway 126, Highway 126 is the primary east-west highway in Lane County, running from Florence to Redmond.*

Other transportation options in Springfield include: multiple Union Pacific rail lines provide freight service; transit service from the Lane Transit District provides bus service,

³⁷ In 2016, the West Eugene EmX Bus Rapid Transit line is under construction. When complete, it will connect Springfield and Eugene residents to 56,000 jobs along the EmX line. <https://www.ltd.org/latest-news/governor-brown-tours-eugene/>

including Bus Rapid Transit, *within Springfield and connects Springfield with Eugene; and the Eugene Airport provides both passenger and freight service. Springfield's access to multiple modes of transportation provides Springfield with advantages in attracting businesses that need easy access to I-5 for automotive or some types of freight movement. Springfield may have disadvantages in attracting businesses that need large lots and easy access to I-5 because of the lack of buildable land along I-5 near Highway interchanges.*

- **Public Facilities and Services.** *The City has sufficient wastewater and water services to meet expected residential and employment needs. SUB has lower water rates than the national average. The combination of available and lower cost water may be an advantage to attracting some types of businesses to Springfield.*
- **Public Policy.** *The City can impact economic growth through its policies about the provision of land, redevelopment, and infill development. Success at attracting or retaining firms may depend on availability of attractive sites for development, especially large sites. For example, Springfield was attractive as a location of PeaceHealth's new hospital because the City had a large, relatively flat site located relatively near to Interstate 5 and Beltline Highway. Springfield's decision makers articulated their support for provision of employment land through the economic development strategy and in other policy choices. Objectives in the economic development strategy supporting the provision of employment land include objectives to: (1) provide employment land in a variety of locations, configurations, and site sizes for industrial and other employment uses, (2) provide an adequate competitive short-term supply of suitable land to respond to economic development opportunities as they arise, (3) reserve sites over 20-acres for special developments and industries that require large sites, and (4) provide adequate infrastructure to sites. The economic development strategy also includes objectives that support redevelopment of existing land within the UGB, especially in Downtown and in Glenwood, and infill development. The City is promoting redevelopment in Glenwood and Downtown through its administration of two Urban Renewal Districts.*
- **Labor Market.** *Commuting is common in Springfield. About 40% of the people who live in Springfield commute to Eugene for work. Less than one-third of Springfield's workers live in Springfield. The implication of this workforce analysis is that, while only one-third of Springfield's workforce lives within the City, Springfield is able to attract educated workers from most of Eugene and surrounding areas. Most people living or working in Springfield commute within the Eugene-Springfield area. This commuting pattern gives Springfield firms access to the workforce within the Eugene-Springfield region.*

Springfield residents generally have a shorter commute than residents of Lane County or Oregon. Eighty percent of Springfield residents commute 29 minutes or less, compared

to 77% of Lane County residents and 69% of Oregonians. 7% of Springfield's residents are commuting 45 minutes or more, compared to 10% of Oregonians.³⁸ The region's existing and planned public transit system provides access to employment within the Eugene-Springfield Metro area. Springfield's potential employment commute shed is extensive.³⁹

Opportunities for workforce training and post-secondary education for residents of the Eugene-Springfield area include: the University of Oregon, Lane Community College, Northwest Christian College, and Gutenberg College."

Appendix C of the CIBL/EOA (pp. 159-162) explains why and how Springfield's comparative advantages are factors that may influence the locational decisions of firms.

"Key determinants of a location decision are a firm's factors of production....In general, firms choose locations they believe will allow them to maximize net revenues: if demand for goods and services is held roughly constant, then revenue maximization is approximated by cost minimization."

Production Factors. Table C-4, pp. 163-165 presents a summary of typical *production factors* and how these factors align with Springfield's labor, land infrastructure, access to markets, materials, entrepreneurship, regulation, taxes, financial incentives, industry clusters, quality of life and innovative capacity. For example:

- *"Labor. Based on existing commuting patterns, Springfield has access to labor from the Eugene-Springfield Region.*
- *Land. Demand for land depends on the type of firm. Manufacturing firms need more space and tend to prefer suburban locations where land is relatively less expensive and less difficult to develop. Warehousing and distribution firms need to locate close to interstate highways.*
- *Access to markets. Firms need to move their product, either goods or services, to the market, and they rely on access to different modes of transportation to do this. Springfield's access to I-5 and Highway 126 provide the City with advantages in attracting businesses that need easy access to highways.*
- *Materials. Firms producing goods, and even firms producing services, need various materials to develop products that they can sell. Some firms need natural resources. For example, lumber manufacturing requires trees. Or, farther down the line, firms may need intermediate materials: for example, dimensioned lumber to build manufactured housing.*

³⁸ CIBL/EOA p. 48-49

³⁹ Map: Industrial Competitiveness Criteria (prepared by LCOG staff for the City of Springfield) is a graphic depiction of a workforce of 250,000 living within a 40-mile radius of the I-105 interchange in Springfield — extending north to Corvallis, south to include Creswell and Cottage Grove, and southeast to include the communities of Lowell and Oakridge.

- *Studies of economic development have shown that location decisions depend on a variety of other factors that indirectly affect costs of production. These indirect factors include agglomerative economies (also known industry clusters), quality of life, and innovative capacity.*
 - *Industry clusters. Firms with similar business activities can realize operational savings when they congregate in a single location or region. Clustering can reduce costs by creating economies of scale for suppliers. For this reason, firms tend to locate in areas where there is already a presence of other firms engaged in similar or related activities.*
 - *Quality of life. A community that features many quality amenities, such as access to recreational opportunities, culture, low crime, good schools, affordable housing, and a clean environment can attract people simply because it is a nice place to be. A region's quality of life can attract skilled workers, and if the amenities lure enough potential workers to the region, the excess labor supply pushes their wages down so that firms in the region can find skilled labor for a relatively low cost. The characteristics of local communities can affect the distribution of economic development within a region, with different communities appealing to different types of workers and business owners. Sometimes location decisions by business owners are based on an emotional or historical attachment to a place or set of amenities, without much regard for the cost of other factors of production.*
 - *Innovative capacity. Increasing evidence suggests that a culture promoting innovation, creativity, flexibility, and adaptability is essential to keeping U.S. cities economically vital and internationally competitive. Innovation is particularly important in industries that require an educated workforce. High-tech companies need to have access to new ideas typically associated with a university or research institute. Innovation affects both the overall level and type of economic development in a region. Government can be a key part of a community's innovative culture, through the provision of services and regulation of development and business activities that are responsive to the changing needs of business.*⁴⁰

The City's CIBL/EOA presents an assessment of Springfield's economic development potential based on the information generated in response to the Review of National, State, Regional, County and Local Trends; Identification of Required Site Types; and an Inventory of Industrial and Other Employment Lands. [OAR 660-009-0015(4)]

Chapter 4 of the CIBL/EOA (pp. 61- 72) identifies potential growth industries and key trends affecting employment growth in Springfield:

⁴⁰ CIBL/EOA. P 159-165.

“One way to determine opportunities for economic development is to determine the sectors with the greatest expected growth in the region (based on the Oregon Employment Department’s forecast for employment growth in Lane County between 2006 and 2016) and the greatest concentration of existing employment in the community (based on a comparison of employment data in Springfield and the State in 2006). Sectors with high employment concentration in Springfield and high growth forecasts are the industries most likely to grow. These sectors in Springfield are: Health and Social Assistance; Administrative and Support and Waste Management Services; Construction; and Accommodations and Food Services.”

Springfield may have opportunities for growth in other sectors that the State forecasts will have high growth, such as: Arts, Entertainment, and Recreation; Management of Companies and Enterprises; Professional, Scientific, and Technical Services; and Private Educational Services.

Historical trends described in Springfield’s EOA include a shift away from manufacturing, a transition away from reliance on traditional resource-extraction industries, and growth of employment in high-technology manufacturing industries (Industrial Machinery, Electronic Equipment, and Instruments.)⁴¹

“Key historical trends between 1980 to 2007 period include:

- *A substantial increase in the share of employment in Services, which increased from 23% to 42% of covered employment in Lane County.*
- *A decrease in the share of employment in Retail Trade, from 21% to 13%. The number of jobs in retail did not decrease substantially over the 27-year period (a loss of nearly 550 retail jobs) but growth in retail jobs lagged behind growth in other sectors, especially service sectors.*
- *A decline in the share of employment in Manufacturing, which fell from 20% to 13% of covered employment.*
- *A decline in the share of employment in Government, which decreased from 20% to 16% of covered employment.*
- *Other sectors of the County’s economy have a relatively stable and small share of the County’s employment.*
- *Historical employment trends show a substantial shift in the Region’s economy that mirrored shifts in the State and national economies, specifically the substantial growth in Services and decline of Manufacturing. While these trends are expected to continue into the future, future shifts are not expected to be as dramatic as those experienced over the past twenty years.”*

⁴¹ CIBL/EOA, p. 49

The EOA explains why it is expected that the future employment mix will be somewhat different than the past:

- *“Growth in the Services sector has matured and should track more closely with overall employment and population growth rather than continuing to gain a substantial share of total employment.*
- *The decline in Manufacturing was due, in part, to decreased timber harvests and the outsourcing of production to facilities in countries with lower costs. Timber harvests are expected to level off and increase in the future as commercial forests that were replanted since the 1970s grow to a harvestable size. While outsourcing will continue, much of what can be outsourced has already gone. Remaining Manufacturing firms are tied to their region to be near supplies or markets, or manufacture specialized goods were small production quantities, fast turn-around times, and the need for quality limit the ability to outsource.”*
- *The mix of Manufacturing jobs in the Eugene-Springfield Region changed over the past twenty years with declines in Wood Products and the growth of employment in Recreational Vehicle (RV) manufacturing, machinery manufacturing, metals manufacturing, and high-tech industries, such as Computer and Electronics Manufacturing.”⁴²*

Major categories of industrial or other employment uses. EOA Chapter 4 pp. 61-75 identifies the major categories of industrial or other employment uses that could reasonably be expected to locate or expand in the Springfield planning area, based on the information about national, state, regional, county or local trends in Chapter 3 (pp. 43-58); and based on Springfield’s possession of the appropriate locational factors for the use or category of use as described in Chapter 3, pp. 54-58 “Springfield’s Comparative Advantages.”

Page 61-68 explain ECONorthwest’s methods and rationale for assessing business that are likely to have future growth in Springfield. ECO examined relative concentration and employment growth of existing business sectors, and relationships and linkages within industries. ECO reasoned that *“sectors that are highly concentrated (meaning there are more than the “average” number of businesses in a sector in a given area) and have had high employment growth are likely to be successful industrial clusters. Sectors with either high concentration of businesses or high employment group may be part of an emerging cluster, with potential for future growth.”*

Based on this analysis and verified by input received through the public involvement process,⁴³ ECO and the City reasoned that the sectors with the most growth potential are: Health and Social Assistance; Administrative and Support; Construction; and Accommodations and Food Services. Other sectors with

⁴² CIBL/EOA pp. 49, 61-62

⁴³ The CIBL Stakeholder Committee and CIBL Technical Advisory Committee processes are fully documented in the record and on the City’s website. CIBL/EOA Appendix D describes the public input the City received to identify Economic Development Objectives and Strategies and potential policies.

growth opportunities are: Arts, Entertainment, and Recreation; Management of Companies and Enterprises; Professional, Scientific, and Technical Services; and Private Educational Services.⁴⁴

ECONorthwest's methods and rationale for assessing business that are likely to have future growth in Springfield is reasonable and consistent with the law.

Existing and potential growth industries and business clusters. CIBL/EOA Table 4-1, Existing and potential growth industries and business clusters in Springfield identifies the following clusters: Medical Services, Manufacturing , Wood Products and Specialty Wood Products, Call Centers, Back-Office Functions, Tourism, High-tech (Software development, Computer electronics, Computer service providers, Data centers), and Biotech (*Springfield has advantages in attracting Biotech firms because of the University of Oregon's work in Biotech, presence of Invitrogen, and national growth in the industry.*)

In Table 4-1, ECO identified existing⁴⁵ and potential growth industries and business clusters in Springfield with employment potential and "secondary employment" businesses associated with each category. For example, "secondary employment" business growth associated with Springfield's RiverBend Regional Medical Center and McKenzie Willamette Hospital Medical Services cluster include Medical Services and Suppliers, Research and Education, Medical equipment manufacturing, Non-medical office space, and services such as retail, restaurants, financial services, etc.

Types of manufacturing⁴⁶ firms with potential growth in Springfield include:

- Food processing⁴⁷
- High-tech electronics⁴⁸
- Recreational Equipment
- Medical Equipment manufacturing.
- Furniture manufacturing
- Specialty apparel
- Cottage industries such as jewelry, apparel, or personal care products
- Plastics manufacturing.

Associated businesses are manufacturing of related or complementary products, additional manufacturing, and services such as retail, restaurants, financial services, etc.⁴⁹

ECONorthwest's methods and rationale for assessing existing and potential growth industries and business clusters in Springfield with employment potential and "secondary employment" businesses

⁴⁴ CIBL/EOA p. 62-63

⁴⁵ "Top Thirty Springfield Employers", employment data, 2015

⁴⁶ Information about the local/regional manufacturing: Livability Lane Cluster Analysis: Manufacturing Cluster Report, 2014.

⁴⁷ Information about the local/regional Food & Beverage industry: Livability Lane Cluster Analysis: Food/Beverage Cluster Report, 2014; and "Doing Business in Oregon" 2012 Food processing.

⁴⁸ Information about the local/regional tech industry is in the record: Livability Lane Cluster Analysis: EduTech Cluster Report, 2014.

⁴⁹ Ibid.

associated with each category that are likely to have future growth in Springfield is reasonable and consistent with the law.

The EOA (p. 64) identifies “Target Industries” for Springfield, based on a range of factors:

- *“Springfield’s existing employment base and the clusters of businesses in Springfield, such as those shown in Table 4-1, Table A-12, or Table A-7.*
- *Springfield’s comparative advantages, especially Springfield’s location in the Southern Willamette Valley next to Eugene, the easy access to Interstate 5 in Springfield, and the availability of educated and trained labor force from across the region.*
- *Local and regional economic trends, such as changes in regional employment (Table A-5), changes in regional business clusters, growth in tourism (Table A-13), growth in agriculture production (Table A-14), or forecasts for regional employment growth (Table A-16).*
- *National and statewide economic trends over the last three decades, such as growth in services or decline in wood products manufacturing.*
- *Local and regional demographic trends*
- *Springfield’s economic development objectives, such as:*
 - *Increasing employment in regional clusters, including: Health Care, Communication Equipment, Information Technology (Software), Metals (Wholesalers), Processed Food and Beverage, Wood & Forest Products, and Transportation Equipment.*
 - *Recruiting businesses that pay higher than average wages for the region.”*

ECO reasoned (with input from the public, CIBL Stakeholder Committee, Technical Advisory Committee, Planning Commission and City Council) that *“the characteristics of Springfield will affect the types of businesses most likely to locate in Springfield. Springfield’s attributes that may attract firms are: the City’s proximity to I-5, high quality of life, proximity to the University of Oregon, the presence of the RiverBend campus, positive business climate, availability of skilled and semi-skilled labor, and proximity to indoor and outdoor recreational opportunities. The types of businesses that may be attractive to Springfield include medical services, services for seniors, manufacturing (small scale and large), specialty food processing, high-tech, professional and technical services, call centers, back office functions, tourism, green businesses, corporate headquarters, services for residents, and government and public services.”*⁵⁰

The uses or categories of use identified in the CIBL/EOA could reasonably be expected to expand or locate in the Springfield planning area because the Springfield area possesses the appropriate locational factors for the use or category of use.

⁵⁰ CIBL/EOA pp. 64-68 list examples of each business type.

ECONorthwest's methods and rationale for identifying target industries with employment potential for the 2010-2030 planning period in Springfield is reasonable, based on empirical evidence, responsive to public input, and consistent with the law.

Conclusions: OAR 660-009-0015(1) and (4).

As explained in the summary and findings above, the City's CIBL/EOA identifies the major categories of industrial or other employment uses that could reasonably be expected to locate or expand in the Springfield planning area based on information about national, state, regional, county or local trends.

The CIBL/EOA uses the review of trends as the principal basis for estimating future industrial and other employment uses as described in section (4) of the rule.

The CIBL/EOA describes how Springfield possesses the appropriate locational factors for the use or category of uses that could reasonably be expected to expand or locate in the planning area.

The CIBL/EOA provides an analysis of trends affecting Springfield in the context of the region, county and state and Springfield's comparative advantages to assess Springfield's community economic development potential pursuant to section (4) of the rule.

Thus, the City's Economic Opportunities Analysis meets the requirement of OAR 660-009-0015 (1) and (4).

The City's 2030 Plan Amendments amend the comprehensive plan to provide an economic opportunities analysis containing the information described in OAR 660-009-0015 (1) and (4).

OAR 660-009-0015(2) Identification of Required Site Types.

"The economic opportunities analysis must identify the number of sites by type reasonably expected to be needed to accommodate the expected employment growth based on the site characteristics typical of expected uses. Cities and counties are encouraged to examine existing firms in the planning area to identify the types of sites that may be needed for expansion. Industrial or other employment uses with compatible site characteristics may be grouped together into common site categories."

This section of Goal 9 rule requires the City's analysis to determine the types, sizes and characteristics of sites of "typical of expected uses", and to determine how many sites of each type are needed to accommodate the expected employment growth. The City is encouraged to base their decision about the types of sites needed by examining existing firms in the planning area.

As explained under OAR 660-009-0015(1), the City’s analysis identified existing and potential employers and growth industries based on historical patterns, workforce, locational factors, Springfield’s comparative advantages and Springfield’s economic development objectives and strategies. It is reasonable to expect that existing uses and target industry uses will expand in or locate in Springfield over the 2010-2030 planning period if land possessing “the appropriate locational factors for the use or category of use” is so designated within the planning area to accommodate those uses.

The analysis examined existing firms in the planning area as basis for its decision about the types of sites needed. For example, the average size of commercial and mixed use sites 20 acres and larger is 60 acres and the average size of industrial sites 20 acres and larger is 63 acres .⁵¹

Table 4-2 explains how and where existing and target industry land uses are and would be permitted within the designated land supply — if sites possessing the needed site sizes and site characteristics were available. Each target industry is an allowed use within multiple plan designations. The acknowledged comprehensive plan designations, and the acknowledged zoning districts that implement them, allow broad groupings of industrial or other employment uses with compatible site characteristics to be developed within various geographic areas of the City. Permitted uses lists for industrial and other employment uses are stated within the applicable zoning district, (Springfield Development Code Chapter 3 Land Use Districts) consistent with the broad categories of land use designations at the metropolitan scale as described in Metro Plan pages II-G-4 to II-G-13 and as amended through the subject 2030 Plan Metro Plan text amendments.

Table 4-2. Target Industries and Plan Designations

Target Industry	Plan Designation										
	Campus Industrial	Commercial	Commercial Mixed Use	Heavy Industrial	High Density Residential Mixed Use	Light Medium Industrial	Light Medium Industrial Mixed Use	Major Retail Center	Medium Density Residential Mixed Use	Mixed Use	Special Heavy Industrial
Medical Services		✓	✓		✓		✓		✓	✓	
Services for Seniors		✓	✓		✓			✓	✓	✓	
Manufacturing	✓			✓		✓	✓			✓	✓
Specialty Food Processing	✓			✓		✓	✓			✓	✓
High-Tech	✓					✓	✓			✓	✓
Professional and Technical Services	✓	✓	✓		✓		✓	✓	✓	✓	
Call Centers	✓		✓				✓			✓	
Back Office Functions	✓		✓			✓	✓			✓	
Tourism		✓	✓				✓	✓		✓	✓
Green Businesses	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Corporate Headquarters	✓	✓	✓		✓		✓		✓	✓	
Services for Residents		✓	✓		✓		✓	✓	✓	✓	
Government and Public Services	✓	✓	✓							✓	

ECONorthwest, CIBL/EOA Table 4-2, p. 69

As stated in OAR 660-009-0025 (1),

⁵¹ CIBL/EOA p. 78, Table 5-2 Average size of needed sites based on average sizes of sites with employment in Springfield, ECONorthwest based on QCEW data

“Plans do not need to provide a different type of site for each industrial or other employment use. Compatible uses with similar site characteristics may be combined into broad site categories. Several broad site categories will provide for industrial and other employment uses likely to occur in most planning areas. Cities and counties may also designate mixed-use zones to meet multiple needs in a given location.”

The City’s 2030 Plan amendments assume that future industrial or other employment uses will locate within lands inside the existing UGB that are designated as shown in Table 4-2 above, and on sites to be added to the UGB to accommodate the City’s deficit of sites larger than 5 acres. Appendix C explains how the employment forecast was converted to site needs by site size and type of building. It is reasonable to assume that industrial uses will primarily locate in industrial or campus industrial zones. Retail and service uses could locate in commercial zones, mixed use zones, and residential mixed-use zones.⁵²

Employment Forecast. CIBL/EOA pages 70-72 and Appendix C explain the data sources and analytical methods used by the City’s consultant ECONorthwest (ECO) to determine the employment growth to be expected. On page 156, ECO explains that the safe harbor in OAR 660-024-0040(9)(a)(A) was used.⁵³ CIBL/EOA page 70-72 presents a 2010-2030 projection of future employment levels in Springfield for the purpose of estimating demand for commercial and industrial land.

“The City’s intent was to adopt this EOA in 2010 and the City noticed DLCD of this intent on October 30, 2009.⁵⁴ As a result, the employment forecast was developed in 2008 and is based on 2006 Quarterly Census of Employment and Wages (QCEW) data. Appendix C presents the process used to arrive at the employment forecast for Springfield. Table 4-3 shows that employment is forecast to grow by 13,440 employees (a 32% increase) between 2010 and 2030.”

As shown in Table 4-3, and as explained in Appendix C, pp. 155-156, the employment forecast for 2010-2030 shows employment growth of 13,440 total jobs.

⁵² CIBL/EOA p. 73

⁵³ Springfield is part of Oregon Employment Department’s Region 5, which includes Lane County.

⁵⁴ Springfield submitted notice to adopt Economic Opportunities Analysis policy amendments and a UGB amendment to DLCD on December 31st, 2009, with a first evidentiary hearing on February 17, 2010. This notice included the 2009 Economic Opportunities Analysis. The October notice to DLCD was in advance of an earlier hearing on the provisional Draft CIBL/EOA which was adopted by City Council Resolution.

Table 4-3. Employment growth in Springfield's UGB, 2010–2040

Year	Total Employment
2008	41,133
2010	42,284
2030	55,724
2030	55,724
2031	56,498
2032	57,283
2033	58,079
2034	58,886
2035	59,704
2036	60,534
2037	61,375
2038	62,228
2039	63,093
2040	63,970
Change 2010 to 2030	
Employees	13,440
Percent	32%
AAGR	1.4%

Source: ECONorthwest

Forecast of employment growth by building type. Next, ECO allocated employment to building types to determine the number of sites needed to accommodate the forecast growth based on the site characteristics typical of expected uses. The number of sites needed is dependent upon the site requirements of employers. ECO grouped employment into building types with similar building and site requirements.

“For example, the following service sectors were grouped together into the “office” building type because they need similar types of built space with similar site requirements: information, finance, real estate, professional services, management of companies, administrative support, utilities, arts and entertainment, and other services.”

ECO presented a forecast of employment growth by building type. (Table C-3, p. 157 and Table 4-4, p. 72). The forecast in Table C-3 assumes that Springfield will have growth in all categories of employment. It also assumes that the share of employment will increase in other services (2.2% increase in share) and office (1.3% increase in share). At the same time, the share of employment will decrease in general industrial (1.8% decrease in share), warehousing and distribution (1.0% decrease in share), and retail (0.7% decrease in share). In terms of jobs, employment will increase in all of these sectors.⁵⁵

⁵⁵ The assumptions about the changes in share of all employment are explained CIBL/EOA pp. 158-159. The employment projections in the CIBL/EOA do not take into account a major jump in employment that could result from the location of one or more large employers in the community during the planning period. “Major economic events such as the successful recruitment of a very large employer are very difficult to include in a study of this nature.”

“For the purpose of the Springfield EOA, building types are used to relate employment by industry to site needs. The method used to describe site needs is to group industries based on building and site characteristics. This is consistent with how real estate markets work for urban development—demand for land is derived from demand for space. The type of building and industry is then related to land characteristics needed (e.g., site needs) to accommodate that industry. It is also consistent with OAR 660-009-0015(1) which states “Industrial or other employment uses with compatible site characteristics may be grouped together into common site categories. “ For this analysis, ECO relates industries by NAICS codes to building types which are used as a proxy for site needs. Each sector has been uniquely assigned to a “typical” building type, grouped by industrial and commercial uses.”

Site needs and site characteristics typical of expected uses. Appendix C explains the process ECO used to convert employment forecast to site needs. The following section of this report explains how the EOA addressed OAR 660-009-0015(2): *“site characteristics typical of expected uses.”*

The tables in Appendix C provide data to document typical building and site needs of various industries.⁵⁶ In addition to the evidence provided in the CIBL/EOA document, the record provides extensive supplemental evidence to explain the site needs of industries and the typical characteristics of sites that are necessary to support business operations and develop in accordance with applicable Federal, State and Local regulatory requirements.

Table C-5 “Characteristics of Sites Needed to Accommodate Employment Growth”⁵⁷ presents and explains common site needs for expected industrial and other employment uses. Table C-5 summarizes 14 site attributes and explains how each attributes aligns with Springfield sites: flat site; parcel configuration and parking; soil type; road, rail, air, transit transportation; pedestrian and bicycle facilities; labor force; amenities; fiber optics and telephone; potable water; power requirements, and land use buffers.

Key points from Table C-5:

- *“Large Industrial and Commercial firms that require on-site parking or truck access are attracted to sites that offer adequate flexibility in site circulation and building layout. Parking ratios of 0.5 to 2 spaces per 1,000 square feet for Industrial and 2 to 3 spaces per 1,000 square feet for Commercial are typical ratios for these firms. In general rectangular sites are preferred, with a parcel width of at least 200-feet and length that is at least two times the width for build-to-suit sites. Parcel width of at least 400 feet is desired for flexible industrial/business park developments and the largest Commercial users.*

⁵⁶ CIBL/EOA p. 71-72

⁵⁷ CIBL/EOA. P. 167-169

- *All firms are heavily dependent upon surface transportation for efficient movement of goods, customers, and workers. Access to an adequate highway and arterial roadway network is needed for all industries. Close proximity to a highway or arterial roadway is critical for firms that generate a large volume of truck or auto trips or for firms that rely on visibility from passing traffic to help generate business.*
- *Businesses in Springfield have access to I-5, Highway 126, Highway 99 (in Eugene), and Highway 58. The Gateway area is highly visible from I-5. Springfield also has a well-developed street network within the City. The City may need to work with large businesses to increase automotive capacity in newly developed areas or in areas where the intensity of employment uses increase substantially.*
- *Rail access can be very important to certain types of heavy industries. The region has good rail access to many industrial sites. Springfield is served by multiple Union Pacific rail lines. There are two primary junctions in Springfield: (1) the Springfield Junction is located in the Glenwood area in Southwest Springfield and (2) the Mohawk Junction is near the city's southern boundary, near 25th St.*
- *Proximity to air transportation is important for some firms engaged in manufacturing, finance, or business services. Springfield is located 15 miles from the Eugene Airport.*
- *Transit access is important for Springfield's target industries, especially those with many employees and customers and for businesses that employ and serve segments of the population without access to an automobile. Springfield has access to transit through the Lane Transit District (LTD). There are multiple bus lines that run throughout Springfield and multiple buses that connect Springfield and Eugene. The first two lines of the EmX bus rapid transit system have been completed and serve existing employment nodes in Glenwood, Downtown and RiverBend/Gateway. Additional Frequent Transit Network (FTN) routes are identified in the Regional Transportation Plan. In 2016, The Main Street Corridor FTN route is being planned.*
- *The ability for workers to access amenities and support services such as shopping, entertainment and recreation areas by foot or bike is increasingly important to employers, particularly those with high-wage professional jobs. The need for safe and efficient bicycle and pedestrian networks will prove their importance over time as support services and neighborhoods are developed adjacent to employment centers. Springfield has pedestrian and bicycle facilities.*

Springfield last updated the City Bicycle Plan in 1998. The plan proposes expansion of bicycle facilities to improve bicycle connectivity throughout the City and to neighboring communities. People in Springfield are able to use bicycle facilities for commuting if they live and work in areas of the City that have bicycle infrastructure. Commuting via pedestrian facilities may be more limited to people who live near their work. Springfield's pedestrian and bicycle facilities can be used on conjunction with LTD buses to provide opportunities for alternative methods of commuting for people that live further from work.

- *According to the International Economic Development Council,⁵⁸ attracting and retaining skilled workers requires that firms seek out places offering a high quality of life that is vibrant and exciting for a wide range of people and lifestyles. Springfield offers access to outdoor amenities and an excellent parks and recreation district (Willamalane). Many urban amenities are available in Springfield and Eugene.*
- *Most, if not all industries expect access to multiple phone lines, a full range of telecommunication services, and high-speed internet communications. Springfield has access to high-speed telecommunications facilities.*
- *Potable water needs range from domestic levels to 1,000,000 gallons or more per day for some manufacturing firms. However, emerging technologies are allowing manufacturers to rely on recycled water with limited on-site water storage and filter treatment. The demand for water for fire suppression also varies widely. Springfield has sufficient potable water to meet current and expected needs.*
- *Electricity power requirements range from redundant (uninterrupted, multi-sourced supply) 115 kva to 230 kva. Average daily power demand (as measured in kilowatt hours) generally ranges from approximately 5,000 kwh for small business service operations to 30,000 kwh for very large manufacturing operations. The highest power requirements are associated with manufacturing firms, particularly fabricated metal and electronics. For comparison, the typical household requires 2,500 kwh per day. Springfield has access to sufficient power supply to accommodate most commercial and industrial users.*

⁵⁸ International Economic Development Council. "Economic Development Reference Guide," <http://www.iedonline.org/hotlinks/SiteSel.html>. 10/25/02.

- *According to the public officials and developers/brokers ECO has interviewed, industrial areas have operational characteristics that do not blend as well with residential land uses as they do with Office and Commercial areas. Generally, as the function of industrial use intensifies (e.g., heavy manufacturing) so too does the importance of buffering to mitigate impacts of noise, odors, traffic, and 24-hour 7-day week operations. Adequate buffers may consist of vegetation, landscaped swales, roadways, and public use parks/recreation areas. Depending upon the industrial use and site topography, site buffers range from approximately 50 to 100 feet. Selected commercial office, retail, lodging and mixed use (e.g., apartments or office over retail) activities are becoming acceptable adjacent uses to some light industrial areas. Springfield's employment sites are generally located in areas where employment is compatible with other development. In areas where employment is not directly compatible with adjacent uses, the City may require buffers between incompatible uses."*

Site needs data. CIBL/EOA Table C-6 through Table C-11 present data from a range of sources describing site needs attributes of businesses that either considered locating in Oregon (including in the Eugene-Springfield area) or are industries within one or more of Springfield's target growth sectors or clusters. These examples are presented in the CIBL/EOA to illustrate that businesses have a wide range of need for site size, location, and characteristics based on the business's individual operational needs. "The site needs of businesses vary from business to business, even within the same industry. As a result, one business's site needs may be different and potentially even conflicting with another business's site needs."⁵⁹

Long term and short term site needs are estimated in CIBL/EOA pp. 72-75:

- *"Types of needed sites are based on the site characteristics typical of expected uses."*
- *"The Goal 9 rule provides flexibility in how jurisdictions conduct and organize this analysis. For example, site types can be described by plan designation (i.e., heavy or light industrial), they can be by general size categories that are defined locally (i.e., small, medium, or large sites), or it can be industry or use-based (i.e., manufacturing sites or distribution sites)."*
- *"Firms wanting to expand or locate in Springfield will be looking for a variety of site and building characteristics, depending on the industry and specific circumstances. Previous research conducted by ECO has found that while there*

⁵⁹ CIBL/EOA, p. 170-178. The record provides additional evidence to describe the characteristics of sites needed to accommodate industrial and other employment growth target industries, including industries that require sites 20-acres and larger.

are always specific criteria that are industry-dependent and specific firm, many firms share at least a few common site criteria. In general, all firms need sites that are relatively flat, free of natural or regulatory constraints on development, with good transportation access and adequate public services. The exact amount, quality, and relative importance of these factors vary among different types of firms. This section discusses the site requirements for firms in industries with growth potential in the Eugene-Springfield Region, as indicated by the Oregon Employment Department forecast (see Table A-12 in Appendix A for the regional forecast)."

Conclusions: OAR 660-009-0015(2). The CIBL/EOA Appendix C presents a detailed analysis of Springfield's site needs and site characteristics consistent with OAR 660-009-0015(2) and OAR 660-009-0025(1).

The CIBL/EOA, Appendix C and the record provide ample evidence explaining how the City's examination of existing firms in the planning area was used to identify the types of sites that may be needed for expansion.

The City's analysis grouped Industrial or other employment uses with compatible site characteristics into common site categories.

Appendix C discusses the factors that affect business' locational decisions and how these factors influence the decisions of businesses that may choose to expand or locate in Springfield. Appendix C describes and explains the characteristics of sites needed to accommodate employment growth and Springfield's ability to provide sites possessing those characteristics.

The City's CIBL/EOA provides identification of required site types based on the site characteristics typical of expected uses (CIBL/EOA pp. 82-95, and Appendix C).

The City's CIBL/EOA provides identification of required site types consistent with the requirements of OAR 660-009-0015(2).

The City's 2030 Plan Amendments amend the comprehensive plan to provide an economic opportunities analysis containing the information described in OAR 660-009-0015(2).

OAR 660-009-0015(3) Inventory of Industrial and Other Employment Lands states:

"Comprehensive plans for all areas within urban growth boundaries must include an inventory of vacant and developed lands within the planning area designated for industrial or other employment use.

(a) For sites inventoried under this section, plans must provide the following information:

(A) The description, including site characteristics, of vacant or developed sites within each plan or zoning district;

(B) A description of any development constraints or infrastructure needs that affect the buildable area of sites in the inventory; and

(C) For cities and counties within a Metropolitan Planning Organization, the inventory must also include the approximate total acreage and percentage of sites within each plan or zoning district that comprise the short-term supply of land.

(b) When comparing current land supply to the projected demand, cities and counties may inventory contiguous lots or parcels together that are within a discrete plan or zoning district.

(c) Cities and counties that adopt objectives or policies providing for prime industrial land pursuant to OAR 660-009-0020(6) and 660-009-0025(8) must identify and inventory any vacant or developed prime industrial land according to section (3)(a) of this rule.”

CIBL Inventory of Vacant and Potentially Redevelopable Land. The City’s 2030 Plan Amendments to the Metro Plan include an inventory of vacant and developed lands within the planning area designated for industrial or other employment use. Springfield commissioned ECONorthwest in 2008 to conduct the inventory and to prepare the necessary factual base for the Plan. CIBL/EOA Chapter 2 Land Available for Industrial and Other Employment Uses, pp. 5-41 presents the inventory.

As explained on page 5, ECONorthwest used the best available or readily collectable information: GIS data provided by the City Technical Services Division and Lane Council of Governments, aerial orthophotographs, and verification by City staff. ECO worked closely with City Staff, a Technical Advisory Committee, and a Stakeholder Committee during the development and review of the Springfield commercial and industrial buildable lands inventory (CIBL). ECO developed the inventory using the following steps:

- *Assemble and document datasets.* ECO identified data from the Regional Land Information Database (RLID) and GIS data from the City of Springfield and the Lane Council of Governments as primary datasets on which the inventory and analysis was built. RLID includes assessment and taxation data maintained by Lane County.
- *Preliminary analysis.* ECO conducted a preliminary analysis with the GIS and data tables selected for inclusion in the database. The purpose of this task was to work with City staff and the TAC to determine the optimal definitions and supporting methodology to base the final analysis and database structure.

- Data processing and GIS analysis.* In this step ECO performed the GIS analysis and data processing steps necessary to populate the database. Table 2-1⁶⁰ shows plan designations that were included in the commercial and industrial buildable lands inventory.⁶¹ All of the designations included in the inventory allow employment outright. The inventory, however, includes several mixed use designations that allow both employment and housing. The inventory generally uses the 2004 Metro Plan designations with two exceptions: (1) Glenwood, where a 2005 plan amendment changed the designation on approximately 47 acres from Light Medium Industrial Mixed Use to Mixed Use; (2) the PeaceHealth site where land was redesignated from residential to designations that allow employment; and (3) the Marcola Meadows site that included a plan designation change from Campus Industrial to Medium Density Residential/Nodal Development, Mixed-Use Commercial/Nodal Development, and Community Commercial. The implication of these exceptions was to include land that would not have otherwise been included in the inventory. The intent of this step was to increase the accuracy of the inventory.

Table 2-1. Metro plan designations included in the Springfield commercial and industrial buildable lands inventory, 2008

Plan Designation	Allowed Land Uses (yes/no)			
	Commercial	Industrial	Residential	In CIBL?
Campus Industrial	yes	yes	no	yes
Commercial	yes	no	no	yes
Commercial Mixed Use	yes	no	yes	yes
Heavy Industrial	no	yes	no	yes
High Density Res Mixed Use	yes	no	yes	yes
Light Medium Industrial	no	yes	no	yes
Light Medium Industrial Mixed Use	no	yes	no	yes
Major Retail Center	yes	no	no	yes
Medium Density Res Mixed Use	yes	no	yes	yes
Mixed Use	yes	yes	yes	yes
Special Heavy Industrial	no	yes	no	yes

Note: Allowed land uses indicates which uses are allowed in each plan designation. The CIBL includes any plan designation that allows employment, including mixed use designations.

OAR 660-009-0015(3)(a)(A) The description, including site characteristics, of vacant or developed sites within each plan or zoning district;

⁶⁰ CIBL/EOA p. 7.

⁶¹ Between the 2009 Draft CIBL/EOA and 2015 Final CIBL/EOA, some updates were made to Chapter 2. Text was added to clarify data and methodologies used in the BLI. The column titles were updated to clarify the results of the BLI in some tables. The results of the buildable lands inventory were not revised as part of this update. The inventory was prepared for the planning period 2010-2030.

Metro Plan Chapter II, pages II-G-4 through II-G-12, as amended by the City's subject proposal, provides general descriptions and site characteristics of vacant or developed sites within the land use districts that provide sites for industrial and other employment uses. Seven acknowledged neighborhood refinement plans (Downtown, Gateway, Glenwood, Kelly Butte, East Main, Q Street, and Mid Springfield) and approved Master Plans provide more refined descriptions and site characteristics of vacant or developed sites within the land use districts that provide sites planned and zoned for industrial and other employment uses. The Springfield Development Code Chapter 3 provides descriptions and site characteristics of the land use districts that provide sites for industrial and other employment uses. Characteristics addressed include required sizes of plan districts, parcel sizes, minimum development areas, use categories, operational performance standards.⁶²

The City's development regulations in Springfield Development Code Chapter 4 implement Metro Plan policies, State and Federal law and thus are germane to any discussion of site characteristics. [OAR 660-009-0015(3)(a) A and B].⁶³ The policies of the comprehensive plan, as implemented through the City's development standards in SDC Chapter 3 and 4 provide descriptions of land planned and zoned for employment uses, including physical and operational requirements that influence the development area size and configuration needed to operate a use and the placement of development on a site in relationship to public rights of way and abutting land uses.

The City's land use approvals of the RiverBend and Marcola Meadows Master Plans impose additional standards and requirements pertaining to development of employment uses within those areas. Both Master Plans describe land planned and zoned for employment uses and address physical and operational requirements that influence the development area size and configuration needed to operate a use and the placement of development on a site in relationship to public rights of way and abutting land uses.

Springfield's existing acknowledged comprehensive plan and land use regulations identify lands planned and zoned for continued and increased economic growth and activity.

The City's inventory provides the description, including site characteristics, of vacant or developed sites within each plan or zoning district [OAR 660-009-0015(3)(a)(A)].

CIBL/ EOA Chapter 2, (pp. 5-41) provides explanation of the systematic process ECO employed to complete Springfield's inventory. Pages 8-12 provide explanation of how ECO classified each tax lots as "vacant", "developed" or "potentially redevelopable." The City's definition of vacant

⁶² For example, SDC 3.2 -420 and 425 Springfield's Campus Industrial Zoning District standards regulate minimum parcel sizes, frontages, lot coverage, setbacks, parking, driveway and outdoor storage, landscaped buffers, movement of heavy equipment, storage of materials, air pollution controls, reduction of glare from lighting, groundwater protection, hazardous waste, noise, radiation and vibration.

⁶³ For example, SDC 4.1-100 regulates street width, block length, site access and driveways, intersections, vision clearances, sidewalks, street trees, bikeways, and accessways. SDC 4.3-110 to 117 regulates on-site stormwater management, water quality and natural resource protection.

land is more inclusive than what statewide planning policy requires. The implication of using a more inclusive definition are that more land was considered available in the inventory than would be if the state definitions were used.

CIBL/ EOA Map 2-1⁶⁴ presents the Metro plan designations used in for inventory purposes.

As shown in CIBL/EOA Map 2-1 Existing Plan Designations, Springfield's previously-designated existing land base will provide sites for commercial and industrial land uses over the planning period, on vacant land, and on land where redevelopment is expected to occur.

OAR 660-009-0015 (3)(a)(B) description of any development constraints or infrastructure needs that affect the buildable area of sites in the inventory

Development constraints applied in the Springfield CIBL/EOA. OAR 660-009-0015 (3)(a)(B) requires the inventory to provide "A description of any development constraints or infrastructure needs that affect the buildable area of sites in the inventory." CIBL/EOA pp. 14-16 presents a description of development constraints or infrastructure needs that affect the buildable area of sites in Springfield's inventory.

Development constraints are defined in OAR 660-009-0005(2):

"Development Constraints" means factors that temporarily or permanently limit or prevent the use of land for economic development. Development constraints include, but are not limited to, wetlands, environmentally sensitive areas such as habitat, environmental contamination, slope, topography, cultural and archeological resources, infrastructure deficiencies, parcel fragmentation, or natural hazard areas."

The rule leaves discretion for local governments in the application of the definition.

*"For the purpose of this CIBL/EOA, the following factors are considered "absolute development constraints" which make employment land unsuitable for development:"*⁶⁵

- *Wetlands – Source: City of Springfield Local Wetland Inventory. File used: wet_lwi.shp, accessed 2008*
- *Floodway – Source: Army Corps of Engineers digital "FIRM" maps. File used: fld_way.shp, accessed 2008*
- *Slopes over 15% - Source: 10 meter digital elevation model (DEM). File used: slopes_over_15.shp, accessed 2008*

⁶⁴ CIBL/EOA, p. 13.

⁶⁵ Each of these files was provided to ECONorthwest by the City in 2008.

- *Riparian resource areas – Source: City of Springfield. File used: Riparian_resource_areas.shp, accessed 2008*
*The following factors were assumed “partial development constraints” in the CIBL/EOA. Partial constraints are factors that may create difficulties in development, but do not preclude development. Partial constraints were not deducted from the inventory. Land with these constraints is classified as “constrained” on employment land. Development can occur on “constrained” land and no deductions were made from the inventory for these factors.*⁶⁶
- *Floodplain – Source: Army Corps of Engineers digital “FIRM” maps. File used: lane_dfirm.shp, accessed 2008*
- *Willamette River Greenway – Source: Lane Council of Governments. File used: Greenway_10m_20080303.shp, accessed 2008*
- *BPA Easements – Source: Bonneville Power Administration. File used: bparow_lane.shp, accessed 2008”*

ECONorthwest used a systematic process to prepare Springfield’s Commercial and Industrial land inventory.

“Processing and analyzing data from the Lane Council of Governments (LCOG) land use database (a database that inventories land uses at the sub-tax lot level), ECONorthwest identified the developed or unsuitable portions of tax lots. Areas of partially vacant tax lots with development were included in the “developed acres” category and remainders were considered “suitable”⁶⁷ (unless they had absolute constraints). The inventory also deducted the “absolute constraints” that make land unsuitable for employment uses. Each of these constraints was available in a GIS format. The four absolute constraints layers were “dissolved” together to create a single “absolute” constrained layer. This was done to avoid double counting since some constraints (e.g., floodways and wetlands) occur in the same place. The combined constraints layer was then used to calculate the portion of the lot that was constrained and therefore unsuitable for development.”⁶⁸

The land base for the inventory the inventory is presented on pp. 17-19 and Map 2-3.

“Vacant” and “potentially redevelopable” land is identified in pp. 21-23 and Maps 2-3, 2-4 and 2-5, pp. 24-26.

As shown in CIBL/EOA Map 2-3 Vacant Commercial and Industrial Land, and CIBL/EOA pp. 21-26, portions of this land base are vacant. The City’s definition of “vacant” is stated on CIBL/EOA p.

⁶⁶ Each of these files was provided to ECONorthwest by the City in 2008.

⁶⁷ OAR 660-009-0005(12) defines “suitable” land as “serviceable land designated for industrial or other employment use that provides, or can be expected to provide the appropriate site characteristics for the proposed use.”

⁶⁸ CIBL/EOA pp. 11-12

9. Springfield's inventory included more land in the inventory that required by rule. Lands with improvement values under \$10,000 were considered vacant.

Springfield's inventory also identified "potentially redevelopable" land where there exists the potential that existing development will be converted to more intensive uses providing more employment capacity during the planning period. This category is discussed on CIBL/EOA p. 9 and 11-12, 21, 27-38, and Map 2-6, p. 32. The CIBL/EOA also includes a parcel-level evaluation of potentially redevelopable sites 5 acres and larger on pp. 33-38.

The City's CIBL inventory of Industrial and Other Employment Lands explains the capacity of vacant, developed and potentially redevelopable sites to meet site needs for the planning period.

The inventory indicates that Springfield has a deficit of suitable sites that are 20 acres and larger, and deficit of sites 5-20 acres in size. After assuming that all site needs for commercial and industrial uses that require sites smaller than 5 acres would be addressed through redevelopment, CIBL/EOA Table 5-4, (p. 80) shows a deficit of 2 industrial sites and 1 commercial and mixed use site 20 acres and larger. Table 5-2 (p. 78) shows the average site size in Springfield for industrial and commercial and mixed use sites 20 acres and larger: 63 acres and 60 acres respectively. Thus Springfield has a need for 126 acres of industrial employment land on 2 sites larger than 20 acres and a need for 97 acres of commercial employment land on 5 sites, including one site that is 60 acres in size.

The City and Lane County amended the Springfield UGB to provide 223 acres of employment land to meet employment land needs that require sites larger than 5 acres.

Conclusions OAR 660-009-0015(3): As amended through the City's 2030 Plan amendments, the comprehensive plan for areas within Springfield's urban growth boundary includes an inventory of vacant and developed lands within the planning area designated for industrial or other employment use that provides the information required in OAR 660-009-0015(3)(a),(b) and (c) because the plan includes a description of the land, development constraints and the approximate total acreage of the sites that comprise the short-term supply of land.

OAR 660-009-0015(3)(a)(C): Short-term supply of land

"For cities and counties within a Metropolitan Planning Organization, the inventory must also include the approximate total acreage and percentage of sites within each plan or zoning district that comprise the short-term supply of land."

The CIBL/EOA pp. 39-41 addresses the requirement for cities within MPOs to make commitments to provide competitive short-term supplies of land. The CIBL/EOA provides an assessment of Springfield's short-term land supply. With the exception of the southern extent of the Jasper-Natron area, all commercial and industrial lands within the existing UGB can be

considered to technically meet the Goal 9 rule criteria of “engineering feasibility.” [OAR 660-009-0020(1)(b), OAR 660-009-0025]. Thus more than 91% of the vacant commercial and industrial land is considered available as short term supply, and more the 85%.

The CIBL/EOA includes the approximate total acreage and percentage of sites within each plan or zoning district that comprise the short-term supply of land. [OAR 660-009-0015(3)(a)(C)]

OAR 660-009-0015(3)(a)(C)(c) vacant or developed prime industrial land

“Cities and counties that adopt objectives or policies providing for prime industrial land pursuant to OAR 660-009-0020(6) and 660-009-0025(8) must identify and inventory any vacant or developed prime industrial land according to section (3)(a) of this rule.”

OAR 660-009-0020(6)/OAR 660-009-0025(8) special siting characteristics

The City’s CIBL/EOA identifies a need for suitable employment land to accommodate uses with “special siting characteristics,”⁶⁹ thus OAR 660-009-0025(8) and OAR 660-009-0015(3)(a)(C)(c) are applicable.

As amended through the City’s 2030 Plan amendments, the comprehensive plan for areas within Springfield’s urban growth boundary includes an inventory of vacant and developed lands within the planning area designated for industrial or other employment use that provides the information required in OAR 660-009-0015(3)(a). The City’s CIBL inventory of Industrial and Other Employment Lands explains the capacity of vacant, developed and potentially redevelopable sites to meet site needs for the planning period. The inventory indicates that Springfield has a deficit of suitable sites that are 20 acres and larger, and deficit of sites 5-20 acres in size. After assuming that all site needs for commercial and industrial uses that require sites smaller than 5 acres would be addressed through redevelopment⁷⁰, CIBL/EOA Table 5-4, (p. 80) shows a deficit of 2 industrial sites and 1 commercial and mixed use site 20 acres and larger. Table 5-2 (p. 78) shows the average site size in Springfield for industrial and commercial and mixed use sites 20 acres and larger: 63 acres and 60 acres respectively. Thus Springfield has a need for 126 acres of industrial employment land on 2 sites larger than 20 acres and a need for 97 acres of commercial employment land on 5 sites, including one site that is 60 acres in size. The City and Lane County amended the Springfield UGB to provide 223 acres of employment land to meet employment land needs that require sites larger than 5 acres.

⁶⁹ CIBL/EOA pp. 82-98 identifies target large-scale manufacturers and large office employers that require sites with special characteristics including : site size 20 acres and larger, topography less 5 % / 7%, transportation access as close to I-5 as possible via unimpeded freight route, access to public facilities and services, and sites with two or fewer owners.

⁷⁰ CIBL/EOA Table 5-1, p. 78 shows that 188 industrial sites and 340 commercial and mixed use sites would redevelop to address land needs over the 20-year period. In addition to this assumption, Springfield concludes that all land needs on sites smaller than 5 acres would be accommodated through redevelopment, including the 6-acre deficit of 2-5 acre sites shown in Table 5-3, p. 79.

The City and Lane County adopted policies in the 2030 Comprehensive Plan Urbanization Element and land use regulations in the Springfield Development Code⁷¹ to protect sites 20 acres and larger from land division in order to accommodate uses that require sites 20 acres and larger.

Conclusion OAR 660-009-0015(3): The CIBL/EOA provides an inventory of industrial and other employment lands consistent with all applicable requirements of the rule.

OAR 660-009-0015(4) Assessment of Community Economic Development Potential

“The economic opportunities analysis must estimate the types and amounts of industrial and other employment uses likely to occur in the planning area. The estimate must be based on information generated in response to sections (1) to (3) of this rule and must consider the planning area's economic advantages and disadvantages. Relevant economic advantages and disadvantages to be considered may include but are not limited to:

- (a) Location, size and buying power of markets;*
- (b) Availability of transportation facilities for access and freight mobility;*
- (c) Public facilities and public services;*
- (d) Labor market factors;*
- (e) Access to suppliers and utilities;*
- (f) Necessary support services;*
- (g) Limits on development due to federal and state environmental protection laws; and*
- (h) Educational and technical training programs.”*

As previously discussed in pp. 31-38 of this report, the CIBL/EOA estimated the types and amounts of industrial and other employment uses likely to occur in the planning area based on information generated in response to sections (1) to (3) of the Goal 9 rule and in consideration of the Springfield planning area's economic advantages and disadvantages. The CIBL/EOA provides assessment of relevant economic advantages and disadvantages including but are not limited to factors (a)-(h) in the CIBL/EOA Chapter 3 and 4, pp. 43-68.

Conclusion OAR 660-009-0015(4). The City's CIBL/EOA provides the required assessment of community economic development potential because it specifically considers several of the

⁷¹ See Ordinance [REDACTED], Exhibit E: SDC 3.2-900 Agriculture- Urban Holding Area (AG) Zoning District

factors as suggested by the rule such as location, buying power of markets, transportation and public facilities.

OAR 660-009-0015(5) public and state agency involvement to inform community economic development objectives

“Cities and counties are strongly encouraged to assess community economic development potential through a visioning or some other public input based process in conjunction with state agencies. Cities and counties are strongly encouraged to use the assessment of community economic development potential to form the community economic development objectives pursuant to OAR 660-009-0020(1)(a).”

As explained in CIBL/EOA Appendix D, Economic Development Objectives and Implementation Strategies⁷², the City conducted a visioning process to assess community economic development potential. State economic development agency staff Bob Warren and local DLCD representative Ed Moore participated on the CIBL Technical Advisory Committee. The Committee provided input and advice to the City’s consultant ECONorthwest to develop a survey and two visioning workshops⁷³ to inform preparation of the CIBL/EOA and Economic Development Objectives and Implementation Strategies. As explained in CIBL/EOA Appendix D, the assessment of community economic development potential was used to form the community economic development objectives pursuant to OAR 660-009-0020(1)(a). Input received through the visioning was used to draft potential economic development policies and actions that ultimately were incorporated into the Springfield Comprehensive Plan Economic Element and Urbanization Element policies to address OAR 6660-009-0020.

Conclusion OAR 660-009-0015(5). The City assessed community economic development potential through visioning and other public input processes in conjunction with state agencies. For example, the City obtained guidance and input from citizen stakeholder and technical advisory committees and used the assessment to form the economic development objectives in the CIBL/EOA and as foundation for developing comprehensive plan goals, policies and strategies in the Economic Element.

⁷² The local record contains complete documentation of the survey conducted April 4-May 27, 2008 and workshops.

⁷³ Community workshops conducted May 20, 2008 and July 31, 2008

IVb. Industrial and Other Employment Development Policies

OAR 660-009-0020 Industrial and Other Employment Development Policies

“(1) Comprehensive plans subject to this division must include policies stating the economic development objectives for the planning area. These policies must be based on the community economic opportunities analysis prepared pursuant to OAR 660-009-0015 and must provide the following:

(a) Community Economic Development Objectives. The plan must state the overall objectives for economic development in the planning area and identify categories or particular types of industrial and other employment uses desired by the community. Policy objectives may identify the level of short-term supply of land the planning area needs. Cities and counties are strongly encouraged to select a competitive short-term supply of land as a policy objective.

(b) Commitment to Provide a Competitive Short-Term Supply. Cities and counties within a Metropolitan Planning Organization must adopt a policy stating that a competitive short-term supply of land as a community economic development objective for the industrial and other employment uses selected through the economic opportunities analysis pursuant to OAR 660-009-0015.

(c) Commitment to Provide Adequate Sites and Facilities. The plan must include policies committing the city or county to designate an adequate number of sites of suitable sizes, types and locations. The plan must also include policies, through public facilities planning and transportation system planning, to provide necessary public facilities and transportation facilities for the planning area. Cities and counties must adopt measures adequate to implement policies adopted pursuant to OAR 660-009-0020. Appropriate implementing measures include amendments to plan and zone map designations, land use regulations, public facility plans, and transportation system plans.”

OAR 660-009-0020(1)(a) Comprehensive plan policies stating community economic development objectives

As required by OAR 660-009-0020(1)(a), the City and Lane County adopted Ordinance Exhibit B, amending the Metro Plan to establish the Springfield 2030 Comprehensive Plan Economic Element (Exhibit B-1) and its Technical Supplement Springfield CIBL/EOA (Exhibit B-2) as the community economic opportunities analysis, economic development objectives and comprehensive plan policies applicable to Springfield’s planning area. The Economic Element is

a statement of City's economic development objectives, based on the Springfield CIBL/EOA analysis prepared pursuant to OAR 660-009-0015.

To begin its work to develop the CIBL/EOA in 2008-2009, the City conducted a public involvement process to identify potential industrial and other employment development objectives. CIBL/EOA Appendix D Economic Development Objectives and Strategies is a description of the process and summary of results. The process identified implementation steps toward achieving the objectives, including recommended comprehensive plan policy and code amendments consistent with the strategies.

The CIBL/EOA and Economic Development Objectives and Strategies provided the foundation for the City Council's subsequent policy development for Springfield 2030 Comprehensive Plan Economic Element.

The Springfield 2030 Comprehensive Plan Economic Element Goals, Policies, Implementation Strategies and Analysis (including the Technical Supplement CIBL/EOA) are adopted as amendments to the comprehensive plan, replacing the more general metro-wide goals, objectives, and findings contained in the *Eugene-Springfield Metropolitan Area General Plan* (Metro Plan) Economic Element Chapter IIIB. The Metro Plan policies are based on older land inventories and studies conducted at the regional scale. The Metro plan was acknowledged prior to the State's adoption of OAR 660-009-0015. The Metro area does not have an adopted Economic Opportunities Analysis consistent with Division 9 Administrative Rules.

The Springfield 2030 Comprehensive Plan Economic Element and Economic Opportunities Analysis were prepared and adopted as post-acknowledgement amendments of the comprehensive plan, consistent with Goal 9 and Division 9 Administrative Rules.

The City's 2030 Plan amendments (Ordinance [REDACTED], Exhibits A, B, C, D and E) adopt comprehensive plan policy and code amendments to implement the economic development objectives for Springfield's planning area, based on the community economic opportunities analysis (Exhibit B-2) prepared pursuant to OAR 660-009-0015.

Ordinance [REDACTED], Exhibit B Springfield 2030 Comprehensive Plan Economic Element (Exhibit B-1 and Exhibit B-2 Technical Supplement CIBL/EOA) identifies the goals, policies, implementation strategies and analysis that the City of Springfield, in cooperation with Lane County, has adopted to provide an adequate land supply for economic development and employment growth within Springfield's UGB in compliance with Statewide Planning Goal 9, Economic Development. The economic development policy direction established through adoption of the Springfield Economic Element is focused to capitalize on Springfield's strengths and opportunities within the broader Southern Willamette Valley region as identified in the 2015 CIBL/EOA. The Springfield Economic Development Planning goals express the desired community development outcomes and economic benefits the City aspires to achieve as it addresses the needs identified in the CIBL/EOA. Springfield Economic Element provides policy direction for updating and amending refinement plans, zoning, and development regulations to address the community's

commercial, industrial and other employment development needs over the 2010-2030 planning period. The City's 2030 comprehensive plan policies support the growth of the local, regional and State economy through designation of suitable, serviceable land for economic development. Implementation of the Plan over the 20-year period will support development patterns that integrate land use, transportation, and public facilities planning to sustain a healthy, prosperous and equitable environment aligned with Springfield's interests, values and assets. The City's 2030 Plan policies guide City-initiated updates to land use refinement plans and zoning at the city-wide, district, corridor, and neighborhood scales, and establish policies applicable to property owner-initiated plan amendment or zoning proposals.

The record provides complete documentation of the public process employed by the City to develop the CIBL/EOA, and the Economic Development Objectives and Strategies (CIBL/EOA Appendix D) to identify categories or particular types of industrial and other employment uses desired by the community. The City's findings under OAR 660-009-0015(1) and (2) explain how the CIBL/EOA identifies categories or particular types of industrial and other employment uses.

Conclusion OAR 660-009-0020(1)(a): As amended by the City's 2030 Plan amendments, Springfield's comprehensive plan policies state the economic development objectives for the planning area based on the community economic opportunities analysis prepared pursuant to OAR 660-009-0015. The plan identifies categories or particular types of industrial and other employment uses desired by the community.

OAR 660-009-0020(1)(b) Required policy commitment to provide a competitive short-term supply of land

"Cities and counties within a Metropolitan Planning Organization must adopt a policy stating that a competitive short-term supply of land as a community economic development objective for the industrial and other employment uses selected through the economic opportunities analysis pursuant to OAR 660-009-0015."

Springfield is within the Central Lane MPO, thus OAR 660-009-0020(1)(b) applies. As stated in the CIBL/EOA, pp 39-40:

"The Goal 9 Administrative Rule (OAR 660-009) includes provisions that require certain cities to ensure an adequate short-term supply of industrial and other employment lands. OAR 660-009-005(10) defines short term supply as follows:

"...suitable land that is ready for construction within one year of an application for a building permit or request for service extension. Engineering feasibility is sufficient to qualify land for the short-term supply of land. Funding availability is not required. "Competitive Short-term Supply" means the short-term supply of

land provides a range of site sizes and locations to accommodate the market needs of a variety of industrial and other employment uses.”

“The Goal 9 rule also requires cities in a Metropolitan Planning Organization (MPO, which includes Springfield) to make a commitment to provide a competitive short-term supply of land and establishes targets for the short-term supply of land. Specifically, OAR 660-009-0020(1)(b) states:

“Cities and counties within a Metropolitan Planning Organization must adopt a policy stating that a competitive short-term supply of land as a community economic development objective for the industrial and other employment uses selected through the economic opportunities analysis pursuant to OAR 660-009-0015.”

Springfield 2030 Comprehensive Plan Economic Element Policy E.5 states:

“Provide an adequate, competitive short-term supply of suitable land to respond to economic development opportunities as they arise. “Short-term supply” means suitable land that is ready for construction within one year of an application for a building permit or request for service extension. “Competitive Short-term Supply” means the short-term supply of land provides a range of site sizes and locations to accommodate the market needs of a variety of industrial and other employment uses.”

Springfield 2030 Comprehensive Plan Economic Element Policy E.6 states:

“Facilitate short term and long term redevelopment activity and increased efficiency of land use through the urban renewal program, updates to refinement plans and the development review process.”

Springfield 2030 Comprehensive Plan Economic Element Policy E.7 states:

“Where possible, concentrate development on sites with existing infrastructure or on sites where infrastructure can be provided relatively easily and at a comparatively low cost.”

OAR 660-009-0025(3) provides short-term land supply targets for cities within MPOs:

“Short-Term Supply of Land. Plans for cities and counties within a Metropolitan Planning Organization or cities and counties that adopt policies relating to the short-term supply of land must designate suitable land to respond to economic development opportunities as they arise. Cities and counties may maintain the short-term supply of land according to the strategies adopted pursuant to OAR 660-009-0020(2).

(a) Except as provided for in subsections (b) and (c), cities and counties subject to this section must provide at least 25 percent of the total land supply within the urban growth boundary designated for industrial and other employment uses as short-term supply.

(b) Affected cities and counties that are unable to achieve the target in subsection (a) above may set an alternative target based on their economic opportunities analysis.

(c) A planning area with 10 percent or more of the total land supply enrolled in Oregon's industrial site certification program pursuant to ORS 284.565 satisfies the requirements of this section.

In summary, the rule requires Springfield to assess the short-term supply of land based on the criteria that land can be ready for construction within one year. The determination is based on "engineering feasibility."

OAR 660-009-0020 (1)(b) and OAR 660-009-0025 (3) Conclusion: The CIBL/EOA provides an analysis of short-term supply on pages 40-41 to demonstrate that most of Springfield's land supply within the existing UGB (91% of vacant commercial and industrial land and 85% of land with redevelopment potential) is considered short-term supply because land can be ready for construction within one year based on "engineering feasibility." Thus the short-term supply meets and exceeds the 25% threshold of OAR 660-009-0025 (3)(a). The City and Lane County adopted Economic Element Policy E.5 to state commitment to providing a competitive short-term supply of land to accommodate industrial and other employment uses it selected through the economic opportunities analysis.

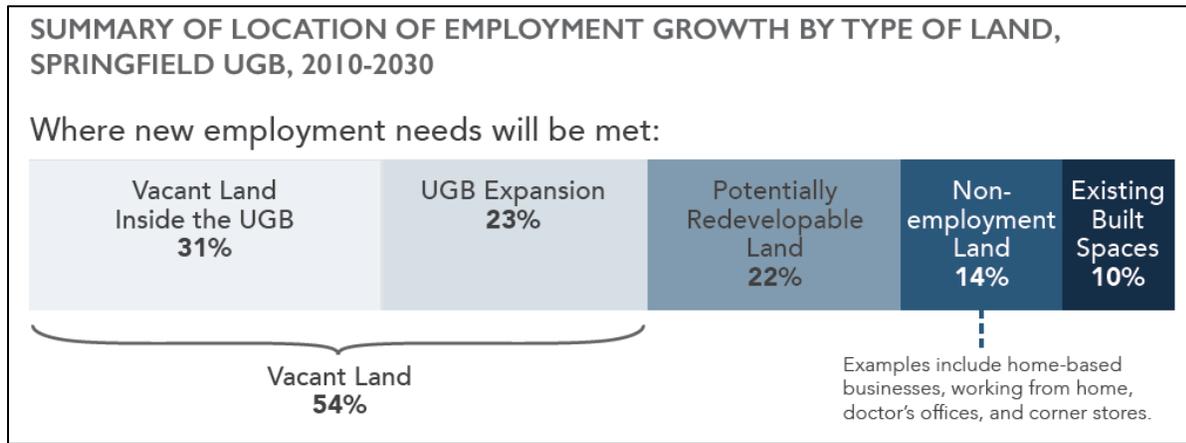
IVc. Policies committing the city to designate an adequate number of sites of suitable sizes, types and locations

OAR 660-009-0020(1)(c) Policy commitment to designate adequate sites and facilities:

"The plan must include policies committing the city or county to designate an adequate number of sites of suitable sizes, types and locations. The plan must also include policies, through public facilities planning and transportation system planning, to provide necessary public facilities and transportation facilities for the planning area."

Designated sites for employment growth. Springfield is required to have comprehensive plan policies that designate "an adequate number of sites of suitable sizes, types and locations" in the Springfield UGB supported by public facilities planning and transportation system planning policies to provide necessary public facilities and transportation facilities for the planning area.

The City’s CIBL/EOA and 2030 Plan policies assume growth will be distributed as summarized in the following graphic “Summary of Location of Employment Growth by Type of Land”.⁷⁴



Land already designated for employment (including non-employment land that supports home-based businesses, working from home, home occupations and neighborhood commercial uses⁷⁵) will provide sites inside the existing UGB on vacant sites, potentially redevelopable sites, non-employment sites, and existing built space sites.

As shown in the graphic above, 77% of employment growth is assumed to occur on land inside the existing UGB as currently designated in the Metro Plan and Springfield’s refinement plans, and subject to existing zoning and development standards, and 23% of employment growth is assumed to occur on land added to the UGB. Land inside the existing UGB is subject to existing public facilities planning policies of the *Metro Public Facilities and Services Plan* and existing local and regional transportation planning policies. Thus, 77% of employment growth is already planned to be provided with necessary public facilities and transportation facilities over the planning periods of the facilities plans.

Existing designated and zoned vacant, developed and redevelopable land supply. The City’s 2030 Plan adopted inventories, analyses and policies that support employment growth on land already designated for employment uses within the existing UGB. Springfield’s inventory of the existing land base designated for commercial and industrial uses is described in CIBL/EOA Chapter 3, (pp. 5-42). Springfield’s existing land base designated for commercial and industrial uses is shown and described in the Metro Plan diagram and text and Springfield refinement plans and text. Springfield’s existing zoning districts regulate the supply of land for commercial and industrial uses, as listed in the Springfield Development Code Chapter 3 and as described in Sections 3.2-300, 3.2-400, 3.2-500, 3.2-600, 3.3-100, 3.3-200, 3.3-300, 3.3-400, 3.3-500, 3.3-900, 3.3-1000, 3.3-1100, 3.4-100, 3.4-200, 3.4-300. Springfield Development Code development

⁷⁴ ECONorthwest, City of Springfield CIBL for the Planning Period 2010-2030, Summary Report, August 2015.

⁷⁵ Metro Plan p. II-G-5 to II-G-6 describes neighborhood commercial facilities (not shown on Metro Plan diagram). Springfield Development Code 3.2-305 describes the Neighborhood Commercial Zoning District.

regulations for wastewater and stormwater infrastructure (as described in SDC 4.3-100 and the Engineering Design Standards Manual), and transportation (SDC 4.2-200) implement Metro Public Facilities and Services Plan and Springfield Transportation System Plan policies. Springfield Development Code Chapter 3 regulates site development, parking, loading, landscaping and screening and specific uses (SDC 4.7-100).

2030 policy commitments to designate suitable sites, types and locations as identified in the CIBL/EOA to meet employment land needs. The City's 2030 Plan amendments amend the UGB and adopt Economic Element and Urbanization Element policies and strategies committing the City to ensure designation of an adequate number of sites of suitable sizes, types and locations as identified in the CIBL/EOA to meet employment land needs. The policies and implementation strategies commit the City to multiple actions to designate site types, sizes and locations that will diversify the mix of commercial and industrial land in Springfield to address employment land needs. These actions range from expanding the UGB to add 223 acres of suitable large site employment land (sites larger than 20 acres and sites 5-20 acres), to establishing policy direction that will guide future plan and zoning amendments through City refinement planning processes and through review of owner-initiated land use development proposals.

Springfield 2030 Comprehensive Plan (2030 Plan) Economic Element Policy E.1 states:

“Designate an adequate supply of land that is planned and zoned to provide sites of varying locations, configurations, size and characteristics as identified and described in the Economic Opportunity Analysis to accommodate industrial and other employment over the planning period. These sites may include vacant undeveloped land; partially developed sites with potential for additional development through infill development; and sites with redevelopment potential.”

Policy commitments to enable and foster redevelopment. Potentially redevelopable land is shown in CIBL/EOA Map 2-6 (p. 32). CIBL/EOA Table 2-11 (p. 31) identified 11 sites 5 acres and larger as being potentially redevelopable. The City conducted a parcel-level evaluation of these sites.⁷⁶ As explained in Table 2-12 (p. 33-38), the City assumes that 7 of these 11 potentially redevelopable sites 5 acres and larger offer redevelopment opportunities in the 2010-2030 planning period. The results of the evaluation of tax lots in Table 2-12 show that one of the seven potentially redevelopable sites is larger than 20 acres and six of the potentially redevelopable sites are 5-20 acres in size. The largest potentially redevelopable site is a 47-

⁷⁶ CIBL/EOA pp. 33-39

acre parcel in the Jasper-Natron Special Heavy Industrial District (Taxlot: 1802100000200).



This site has approximately 36 acres of unconstrained land, divided by seven separate areas of inventoried wetlands. Given the configuration of absolute constraints on this parcel, the City reasoned that the site could provide redevelopment opportunity on 36 acres, across two or more areas within the site.⁷⁷ The City reasoned that this site could provide one of the City's needed sites 20 acres and larger. The site is currently designated "Special Heavy Industrial." Metro Plan p. II-G-8 describes the Special Heavy Industrial (SHI) designation. *"This designation accommodates industrial development that need large parcels, particularly those with rail access."*

As described in CIBL/EOA Table 2-12 (p. 33), the rail spur that formerly served the 47-acre "Natron" site was eliminated when the Straub Parkway was constructed. Staff met with the Union Pacific Industrial Lands Specialist to confirm that this site is no longer accessible by rail. The site is constrained by seven areas of wetlands and a BPA easement. The City reasoned that the existing description of the site in the Metro Plan text may be an impediment to timely and successful redesignation, re-use and redevelopment of the site in the planning period. To contribute to the redevelopment potential of this site, the City and Lane County⁷⁸ adopted an amendment to the Metro Plan text (in Ordinance Exhibit D) to remove the reference to the "Natron Site (south of Springfield)" Special Heavy Industrial site on page II-G-8 of the Metro Plan. Exhibit D amends Chapter II, Section G. Metro Plan Land Use Special Heavy Industrial designation page II-G- 8 as follows:

Two areas are designated Special Heavy Industrial. Listed below are the ~~names~~ of the two areas and applicable land division standards, use limitations, and annexation and servicing provisions.

Natron Site (south of Springfield)

~~Wastewater service is not available to this area in the short term; therefore, industrial firms may be allowed to provide self contained sewage disposal facilities subject to local, state, and federal environmental standards. Annexation to the city shall be required as a condition of development approval. Land divisions in this area shall be a~~

⁷⁷ CIBL/EOA redevelopment analysis, Chapter 2, pp. 9-39.

⁷⁸ The City of Eugene was notified of this text amendment and opted to not participate in the adoption proceedings.

~~minimum of 40 acres until annexation to Springfield has been assured. While industrial park development will be encouraged on this site, opportunity for the siting of industries that require large lots, such as 20 acres or more, will be reserved through the conceptual development planning and site review process.~~

The City incorporated the Exhibit D text amendment into its 2030 Plan amendment to remove an unnecessary regulatory impediment to redevelopment. The City is not redesignating or rezoning the SHI property at this time and SHI uses and “any industry which meets the applicable siting criteria may make use of this designation”⁷⁹ continue to be permitted. Previous visioning for the entire Jasper-Natron area with input from citizens and property owners indicated that the SHI designation is no longer appropriate for this site and that a more flexible Light Industrial or General Employment Designation would encourage re-use or redevelopment of this property in the planning period. The Exhibit D text amendment facilitates redesignation and rezoning of this site in the future. The City and Lane County also adopted a general policy and implementation strategies providing direction for future plan or zoning amendments that could be implemented to address this site and others like it:

2030 Plan Economic Element Policy E.45 states:

“Consider amendments to regulations that will increase predictability and flexibility for industrial site redevelopment and expansion.”

2030 Plan Economic Element Policy Implementation Strategy 45.1 states:

“Consider establishing a new general “Industrial” plan designation to support several different kinds of industrial development.”

2030 Plan Economic Element Policy Implementation Strategy 45.2 states:

“Consider establishing a new “Employment” plan designation and zone that allows a broader array of general industrial uses and develop updated buffering standards.”

2030 Urbanization Element Implementation Strategy 1.3 states:

“Encourage and support redesignation, rezoning, environmental clean-up and redevelopment of brownfields and older industrial sites to allow these lands to redevelop with clean industries and new uses, especially when located in the Willamette Greenway, adjacent to waterways and high value wetlands, and in Drinking Water Protection Zones 1-2 Year TOTZ areas. Provide information to businesses to encourage and facilitate environmental remediation, relocation, and/or redevelopment of these sites.”

2030 Urbanization Element Implementation Strategy 2.1 states:

⁷⁹ Metro Plan p. II-G-8

“Preserve large (20 acres or greater) Heavy Industrial, Light Industrial, Campus Industrial and Employment Mixed Use sites for industrial and other employment uses that require large sites, while allowing redesignations that allow limited supporting retail uses (e.g. food and beverage) within the building to support the primary employment use.”

2030 Urbanization Element Policy E.3 states:

“Work with property owners and their representatives to ensure that prime development and redevelopment sites throughout Springfield and its Urban Growth Boundary that are designated for employment use are preserved for future employment needs and are not subdivided or used for non-employment uses.”

As explained in Table 2-12, the City assumes that six potentially redevelopable sites 5-20 acres offer redevelopment opportunities in the 2010-2030 planning period as follows:

- 12-acre site in the Jasper-Natron Special Heavy Industrial District
- 10-acre site on 28th Street in Heavy Industrial
- 8-acre site on 42nd Street in Heavy Industrial
- 7-acre site at 28th and Marcola Road in Heavy Industrial
- 6.5-acre site on 28th Street in Heavy Industrial
- 6-acre site on Highbanks Road in Heavy Industrial

The City assumed the seven potentially redevelopable sites will be available in the planning period, thus the City reduced the number of needed industrial sites 20 acres and larger by one industrial site⁸⁰, and reduced the number of needed sites 5-20 acres by six sites. Application of this assumption reduced the amount of land needed in the UGB expansion.⁸¹

The CIBL/EOA assumes all of Springfield’s needs for industrial and commercial sites less than 5 acres in size will be met within the existing UGB. Application of this assumption reduced the amount of land needed in the UGB expansion by 2 sites and 6 acres.⁸²

2030 Policy commitments to redevelopment and designation of additional land for mixed-use development to meet site needs. As previously stated, the CIBL/EOA⁸³ assumes that all of Springfield’s needs for industrial and commercial sites less than 5 acres in size will be met within the existing UGB. As shown in CIBL/EOA Appendix C, Table C-10, “Minimum acreage needs, 20,000 and 50,000 sq. ft. building”, some of Springfield’s target employers that locate on “urban office” or “campus style office” sites can locate on vacant or developed, or redevelopable sites smaller than 5 acres. These office uses

⁸⁰ This reduction applied to the number of needed sites and acres can be seen by comparing the figures in CIBL/EOA Tables 5-1 and 5-3, pp. 78-79.

⁸¹ See CIBL/EOA Table 5-1, p. 78.

⁸² See CIBL/EOA Tables 5-3 and 5-4 showing the reduction of needed sites <5 acres from 2 to 0, and the number of needed acres from 230 to 223, pp. 79 and 80

⁸³ CIBL/EOA p. 79

include Back Office, Headquarters, and Professional/Technical Services that require 50,000 square feet or less. Urban office space could be part of mixed-use developments.

The City's previously adopted UGB and Residential Land Use and Housing Element committed the City to meeting all residential land use needs for the 2010-2030 planning period without expanding the UGB. The CIBL/EOA assumes 22% of needed employment will occur on "potentially redevelopable" sites.⁸⁴ These facts point to the need for ample Springfield policy support for redevelopment — including land designated and zoned to accommodate mixed use development — on sites within the existing UGB. To that end, the City and Lane County adopted a UGB and policy commitments that support and rely upon more mixed-use development in Springfield to meet multiple land use needs within its limited and constrained land supply.

2030 Economic Element policies and implementation strategies

The 2030 Economic Element describes Springfield's focused public policy strategy to accommodate employment growth needs on smaller sites by enabling a high level of redevelopment activity.

2030 Economic Element Policy E.1 states:

"Designate an adequate supply of land that is planned and zoned to provide sites of varying locations, configurations, size and characteristics as identified and described in the Economic Opportunity Analysis to accommodate industrial and other employment over the planning period. These sites may include vacant undeveloped land; partially developed sites with potential for additional development through infill development; and sites with redevelopment potential."

2030 Economic Element Implementation Strategy 1.2 states:

"Continue to conduct focused neighborhood, district, and corridor refinement planning processes that engage the community to identify sites with potential for infill and redevelopment; and work collaboratively to update planning and zoning to support job creation and more efficient land use."

The City and Lane County adopted a set of Economic Element policies and strategies committing the City to refinement, corridor and district planning updates that will designate and zone more land to add to Springfield's existing inventory of land designated and zoned Mixed-Use — creating additional opportunities for mixed-use development in Springfield (E.8, E. 9, E.10, E.19, E.22 and Implementation Strategies 4.1, 4.3, 4.4, 4.5, 4.6, 8.2, 8.3, 9.1, 9.2, 9.3, 9.4, 9.5, 9.6, 10.1, 10.2, 10.3, 10.4, 10.5, 10.6, 16.1, 16.2, 16.3, 22.1, 22.4, 24.3, 40.6, 40.7, 40.8).

2030 Economic Element Policy E.6 states:

⁸⁴ CIBL/EOA page vi, Figure S-1

“Facilitate short term and long term redevelopment activity and increased efficiency of land use through the urban renewal program, updates to refinement plans and the development review process.”

2030 Economic Element Policy E.7 states:

“Where possible, concentrate development on sites with existing infrastructure or on sites where infrastructure can be provided relatively easily and at a comparatively low cost.”

2030 Economic Element Implementation Strategy 4.3 states:

“Establish an “Employment Mixed-Use” plan designation to allow secondary supporting land uses in walkable employment centers served by multiple modes of transportation to support the goals of compact urban development.”

2030 Economic Element Implementation Strategy 4.4 states:

“Prepare or update refinement, corridor and district plans to create more opportunities for mixed land uses. Prioritize planning for mixed-used development that includes retail, office commercial, and multifamily housing in downtown, Glenwood, along the Main Street corridor and along the Downtown to Gateway transit corridor.”

2030 Economic Element Implementation Strategy 4.5 states:

“Continue to support policies and develop implementation tools to encourage economically feasible mixed-use development and nodal development in Springfield’s downtown, Glenwood, and in mixed-use nodes in locations identified through the refinement planning process.”

2030 Economic Element Implementation Strategy 4.6 states:

“Encourage co-location of residential and commercial uses in existing buildings by developing resources to make available financial assistance for necessary building upgrades to meet requirements in the building code, such as improvements to meet seismic standards.”

2030 Economic Element Implementation Strategy 24.3 states:

“Support property-owner initiated proposals to redesignate and rezone commercial land located outside of any neighborhood refinement plan areas adopted after June 2011 to Residential Mixed-Use when consistent with Springfield 2030 Plan policies.”

2030 Economic Element Policy 8 states:

“Continue implementing the Downtown District Plan and Implementation Strategy adopted in 2010 to guide revitalization and redevelopment in downtown as resources are available.”⁸⁵

2030 Economic Element Implementation Strategy 8.2 states:

“Amend the Downtown Refinement Plan and Downtown Mixed Use Zone to create new capacity and support for downtown employment uses that use land more efficiently and minimizes the costs of providing infrastructure.”

2030 Economic Element Implementation Strategy 8.8 states:

“Continue to leverage and expand Downtown Springfield as the City’s civic and government center by promoting, investing and seeking opportunities to locate new federal, state and local civic buildings in Downtown or, — if Downtown sites are not readily available — in locations with excellent transit connections to or through Downtown.”

2030 Economic Element Policy 9 states:

“Encourage and facilitate redevelopment of Glenwood as a mixed use housing, employment and commercial center.”

2030 Economic Element Implementation Strategy 9.1 states:

“Continue to support redevelopment of sites in Glenwood through planning, key investments, innovative development standards, and focused activity through the Springfield Economic Development Agency (SEDA), the Glenwood Urban Renewal Plan, the Glenwood Refinement Plan and the Glenwood Riverfront Plan Mixed-Use Plan District.”⁸⁶

2030 Economic Element Implementation Strategy 9.2 states:

“Provide the public infrastructure and services necessary for development in Glenwood, as funds allow.”

2030 Economic Element Implementation Strategy 9.3 states:

“Coordinate economic development in Glenwood with regional and State economic development efforts.”

2030 Economic Element Implementation Strategy 9.4 states:

⁸⁵ Springfield City Council Resolution 10-57

⁸⁶ SDC 3.4-200

“Assist economic development in Glenwood through techniques such as optioning land, land assembly, and cooperative development agreements to assist developers with land assembly issues.”

2030 Economic Element Implementation Strategy 9.5 states:

“Recruit anchor institutions, such as academic and health care institutions to locate in Springfield. Recruit to establish a University of Oregon anchor land use in Glenwood to stimulate private investment in redevelopment of vacant or neglected sites.”

2030 Economic Element Implementation Strategy 9.6 states:

“Implement the Glenwood Riverfront District/Franklin Corridor District Plan and Phase One plan amendments adopted in 2012.”⁸⁷

2030 Economic Element Policy E.10 states:

“Continue to provide public policy and financial support when possible for redevelopment in Springfield. Through the annual Goal-setting process, the City Council shall identify redevelopment target areas.”

2030 Economic Element Implementation Strategy 10.1 states:

“Continue to conduct focused refinement planning in key redevelopment areas, as directed by the City Council, and as resources are available.”

2030 Economic Element Implementation Strategy 10.3 states:

“When preparing or amending refinement plans, work with neighborhood groups to identify needs and opportunities for creating neighborhood mixed use centers near schools and parks to encourage development of neighborhood-serving “corner store” scale retail, small office or live-work units in or adjacent to residential areas. Consider establishing a Neighborhood Commercial Mixed Use designation.”

2030 Economic Element Implementation Strategy 10.4 states:

“Designate a Neighborhood Mixed Use center in Jasper Natron within one half mile of the future school/park sites.”

2030 Economic Element Implementation Strategy 10.5 states:

“Encourage opportunities for employment close to residences, including mixed-use development.”

2030 Economic Element Implementation Strategy 10.6 states:

⁸⁷ SDC 3.4-200 was adopted into the Code in 2013

“Establish Employment Mixed-Use plan designations that could be applied to land along the existing and proposed future high capacity transit corridors and in Nodal Development areas.”

2030 Economic Element Implementation Strategy 22.1 states:

“Expand the Downtown Refinement Plan boundary and Downtown Mixed Use District to support additional commercial activity and to create a more viable retail commercial center as envisioned in the 2010 Downtown District Urban Design Plan and Implementation Strategy; and engage the Downtown Citizen Advisory Committee, Historic Commission and property owners to ensure that the form, scale and intensity of new development contributes positively to the adjacent Washburne Historic District neighborhood. Consider that 100,000-125,000 square feet of retail is required for a viable retail destination district; 50,000-60,000 square feet is needed for an anchor use, such as a grocery store or theater multiplex; and contemporary retail businesses need wider and less deep space than currently provided by buildings on Main Street.”

2030 Economic Element Implementation Strategy 24.4 states:

“Work with property owners and stakeholders through the Main Street Corridor planning process to consider allowing Medium or High Density residential uses in existing commercial zones in addition to commercial uses.”

2030 Economic Element Implementation Strategy 25.2 states:

“Study the feasibility of applying an Employment Mixed-Use or “employment transition” zoning concept to land along the south side of South A Street to support mixed-use redevelopment activity adjacent to the downtown Booth-Kelly center and Mill Race restoration areas when development is compatible with the existing and future use of the rail corridor.”

The City and Lane County adopted policies and strategies committing the City to plan and support redevelopment in Downtown (Policy E.20 and Implementation Strategies 22.1, 22.3) Glenwood (Policy E.21), Main Street Corridor (I.S. 22.9, 24.4), Jasper-Natron (Implementation Strategy 22.6), Mohawk Center (I.S. 22.7)(Policies E.20, E.21, E.22).

The City and Lane County adopted policies and strategies committing the City to provide more zoning flexibility for developing industrial or business parks to support clustering of related or complementary businesses.

Economic Element Policy E.4 states:

“Expand industrial site opportunities through evaluating and rezoning commercial, residential, and industrial land for the best economic return for the community

through the process of Periodic Review of the Metro Plan, refinement plans, master plans, expanding the urban growth boundary, and other means.”

2030 Urbanization Element Policy 2 states:

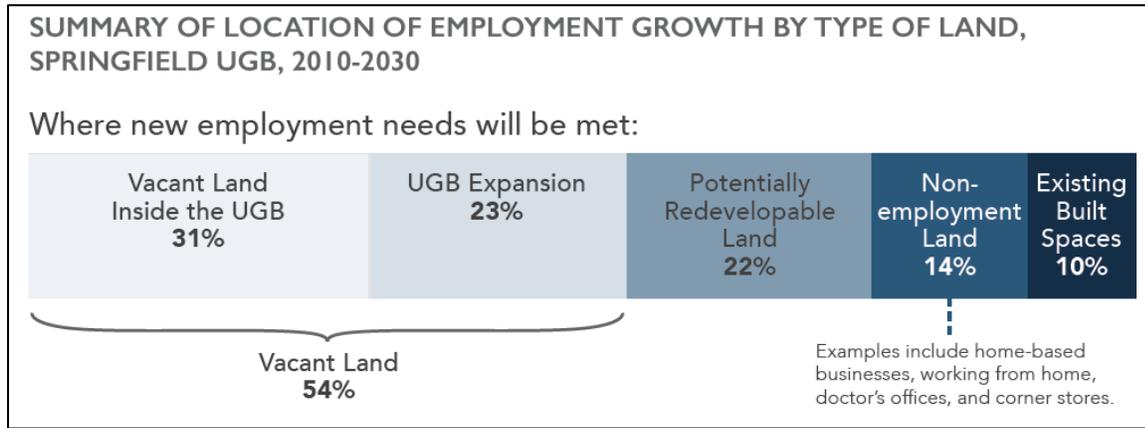
“Continue to support and facilitate redevelopment and efficient urbanization through City-initiated area-specific refinement planning and zoning amendments consistent with the policies of this Plan. Plans shall designate an adequate and competitive supply of land to facilitate short-term and long-term redevelopment activity. Efficiency measures achieved through plan amendments may be reflected in land supply calculations to the extent that they are likely to increase capacity of land suitable and available to meet identified needs during the relevant planning period.”

2030 Urbanization Element Policy 3 states:

“Balance the goals of accommodating growth and increasing average density within the city with goals to stabilize and preserve the established character of sound older neighborhoods. The City shall adopt detailed area-specific refinement plans to clearly define locations where significant growth and redevelopment is expected, and to establish policies and zoning to guide the design of higher density development.”

- ***“Continue to provide public policy and financial support when possible for redevelopment in Springfield.”***
- ***“Continue to prioritize and incentivize redevelopment in the Glenwood and Downtown urban renewal districts and support redevelopment throughout the City as described in the Economic and Residential Elements of this Plan.”***
- ***“Continue to provide development tools and incentives (such as Urban Renewal support) within targeted priority redevelopment areas as resources become available to facilitate expedient and economically feasible redevelopment.”***
- ***“Continue to conduct focused planning in key redevelopment areas, as directed by the City Council, as resources are available. Such efforts will review, update and supersede existing refinement plan designations and policies.”***
- ***“Identify and include public agencies and private stakeholder partners in district-specific planning efforts to facilitate redevelopment through partnerships and other cooperative relationships.”***

UGB expansion sites. 23% of employment growth is assumed to occur on land added to the UGB in 2016 to accommodate large employers with special site needs as described in the CIBL/EOA. The City and Lane County designated these lands “Urban Holding Area – Employment.”⁸⁸



2030 Economic Element Implementation Strategy 1.1 states:

“Amend the UGB, Metro Plan diagram and text to add 223 acres of suitable land to provide employment sites larger than 20 acres and preserve the suitable sites for future development by creating and applying an “Urban Holding Area - Employment” (UHA – E) designation and zone to the sites as described in the Urbanization Element and Springfield Development Code.

To add 223 acres of suitable unconstrained land to provide employment sites larger than 20 acres, Ordinance [redacted], amends the Springfield UGB to add 273 total acres of land to the UGB (total includes existing right of way). As shown in Exhibit A-2, Suitable land to meet the need for industrial and other employment sites is designated “Urban Holding Area – Employment (UHA-E).”

Ordinance [redacted] amends the Metro Plan text and diagram to define and apply the “Urban Holding Area – Employment (UHA-E)” plan designation to the lands shown in Exhibit A-2 and Exhibit D.

2030 Urbanization Element Policy 11 states:

“Plan and zone land within the UHA-E designation to provide suitable employment sites 20 acres and larger to accommodate clean manufacturing uses and office/tech/flex employers in Springfield’s target industry sectors. Limited neighborhood-scale retail uses that primarily serve employees within an industrial or office building or complex may be permitted as a secondary element within employment mixed-use zones. Urban Holding Area-Employment (UHA- E) sites shall not be re-designated or zoned to permit development of regional retail commercial uses.”

⁸⁸ Ordinance [redacted], Exhibit A

2030 Urbanization Element Policy 12 states:

“Master plans are required for contiguous ownerships over 5 acres designated UHA-E and shall address all of the policies of this Plan and the Master Plan requirements of the Springfield Development Code.”

2030 Urbanization Element Policy 22 states:

“Plan and zone the North Gateway UHA-E area to guide development of a well-designed employment district adjacent to the Interstate 5 economic corridor to support diversification and improvement of the local, regional and state economies and to make efficient use of existing and planned public transportation systems and infrastructure. Applicant-initiated plan designation and zoning changes shall address logical extension of transportation and public facilities to serve the entire North Gateway UHA-E district. Development within the North Gateway District shall be zoned and designed to enhance the distinctive physical surroundings and natural resources of the area while accommodating growth and change through implementation of attractive building exteriors and low impact development practices.”

The Springfield UGB as amended provides land for employers requiring sites larger than 20 acres sites 5-20 acres and preserves suitable sites for future development by creating and applying an “Urban Holding Area - Employment Opportunity Area” (UHA – EOA) plan designation and “Agriculture – Urban Holding Area” zoning to the sites as described in the Urbanization Element and Springfield Development Code.

The City and Lane County designated suitable employment sites larger than 5 acres and adopted policies to protect sites larger than 20 acres from land divisions.

Economic Element Policy E.2 states:

“Establish minimum parcel sizes within the “Urban Holding Area - Employment “(UHA – E) designated areas to reserve suitable parcels 20 acres or larger and suitable parcels larger than 50 acres.”

2030 Urbanization Element Policy 7 states:

“For lots/parcels greater than 50 acres in the North Gateway UHA-E District, the minimum lot/parcel size for land division is 50 acres. Land divisions that create lots/parcels for the purpose of establishing a Natural Resource or Public/Semi-Public Parks and Open Space designation within the floodway, wetland or riparian resource portions of the site may create lots/parcels less than 50 acres within the Natural Resource or Public/Semi-Public Parks and Open Space designation portion of the parent lot/parcel. Lots/parcels created and designated for employment purposes shall

retain the 50-acre minimum until planned and zoned to allow annexation and site development with urban employment uses and densities consistent with the policies of this Plan.”

2030 Urbanization Element Policy 8 states:

“For lots/parcels less than 50 acres in the North Gateway and Mill Race UHA-E Districts, the minimum lot/parcel size for land division is 20 acres. Land divisions that create lots/parcels for the purpose of establishing a Natural Resource or Public/Semi-Public Parks and Open Space designation within the floodway, wetland or riparian resource portions of the site may create lots/parcels less than 20 acres within the Natural Resource or Public/Semi-Public Parks and Open Space designation portion of the lot/parcel. Lots/parcels created and designated for employment purposes shall retain the 20-acre minimum until planned and zoned to allow annexation and site development with urban employment uses and densities consistent with the policies of this Plan.”

2030 Economic Element Policy 3 states:

“Work with property owners and their representatives to ensure that prime development and redevelopment sites throughout Springfield and its Urban Growth Boundary that are designated for employment use are preserved for future employment needs and are not subdivided or used for non-employment uses.”

2030 Economic Element Implementation Strategy 11.1 states:

“Plan, zone and reserve a sufficient supply of industrial and commercial buildable land to create opportunity sites for employment uses identified in the 2015 Economic Opportunities Analysis (EOA), with an initial emphasis on Target Industries listed in the analysis Table S-1, Target Industries, Springfield 2010-2030 (page iii-iv.)”

2030 Economic Element Implementation Strategy 12.4 states:

“Encourage the location and expansion of traded sector industries as a means to increase the average wage and contribute to the growth of the local sector economy.”

2030 Economic Element Implementation Strategy 12.5 states:

“Support increased potential for employment in one of the regional industry clusters.”

Commitments to provide necessary public facilities and transportation facilities for the newly urbanizable portion of the planning area. The City’s 2030 Plan policies are coordinated with existing public facilities and transportation plan policies to provide necessary public facilities and transportation facilities for the Springfield planning area. The 2030 Plan continues to rely upon the acknowledged

Metro Plan policies for coordination of public facilities planning at the Metro area level and transportation system planning at the MPO level to provide public facilities and transportation facilities for the planning area. 2030 Urbanization Element policies 43 and 44 (Ordinance Exhibit C-1) commit the city to update public facilities planning and transportation system planning as may be necessary to provide public facilities and transportation facilities for the newly urbanizable lands added to the UGB planning area prior to approval of a plan amendment or zone change that allows transition from rural to urban uses and densities.

2030 Urbanization Element Policy 9 states:

“As directed by the City Council, the City will conduct comprehensive planning processes and adopt refinement-level plans and implementation measures to guide and regulate urban development in the North Gateway and Mill Race UHA-E districts. The Transportation Planning Rule requirements under OAR 660-012-0060 will be addressed prior to any re-designation or zoning map amendment that allows urbanization.”

2030 Urbanization Element Policy 23 states:

“Amend the Gateway Refinement Plan to include the North Gateway UHA-E area prior to or concurrent with approval of an owner-initiated plan amendment or zone change that allows urban development in the North Gateway UHA-E area. The amended Gateway Refinement Plan shall describe the logical extension of transportation and public facilities to serve the entire North Gateway UHA-E area.”

2030 Urbanization Element Policy 27 states:

“The coordinated, timely provision of urban services is a central element of the City’s comprehensive growth management strategy for infill, redevelopment and new development. Development undertaken in pursuit of housing goals, diversifying the economy and neighborhood livability shall occur only after the logical and efficient delivery of all urban services have been provided to these sites.”

2030 Urbanization Element Policy 28 states:

“Regionally significant public investments within Springfield’s UGB shall be planned on a metropolitan-wide basis, as described in the regional transportation and public facilities plans.”

2030 Urbanization Element Policy 37 states:

“Prior to re-designating and rezoning land designated Urban Holding Area-Employment, the City shall update and adopt amendments to the Eugene-Springfield

Metropolitan Public Facilities and Services Plan (PFSP) that may be needed to identify new facilities or major modification of facilities needed to serve development of urban employment uses within the North Gateway or Mill Race districts as necessary to demonstrate accordance with statewide planning Goal 11 and Goal 11 administrative rules requirements and the policies of Metro Plan Chapter III-G Public Facilities Element of the Metro Plan.

2030 Economic Element Policy E.13 states:

“Advocate for and support State, Federal and Metro regional transportation network development policies and initiatives that strengthen Springfield’s economic corridor connections and development/redevelopment potential.”

2030 Economic Element Implementation Strategy 8.3 states:

“Amend infrastructure plans as necessary to include the infrastructure and services that businesses need to operate in downtown Springfield.”

2030 Economic Element Implementation Strategy 8.7 states:

“Collaborate with Springfield Utility Board and other service providers to minimize cost of upgrading and modernizing downtown infrastructure.”

2030 Economic Element Implementation Strategy 13.1 states:

“Take advantage of new commercial and residential development opportunities that will be stimulated by the infrastructure projects identified in the Springfield TSP, such as the Franklin Boulevard improvements in Glenwood.”

2030 Economic Element Policy E.21 states:

“Plan and support redevelopment of the Glenwood Franklin Riverfront and Downtown districts to be mutually supportive and seek funding to connect the two districts with a pedestrian/bike bridge.”

2030 Economic Element Policy E.16 states:

“Consider the economic opportunities provided by transportation corridors and seek to maximize economic uses in corridors that provide the most optimal locations and best exposure for existing and future commercial and industrial uses.”

2030 Economic Element Implementation Strategy 16.1 states:

“Develop a Main Street/Oregon Highway 126 corridor plan to update land use designations, zoning, and development standards; evaluate potential nodal

development areas; and coordinate with Lane Transit District's planning for potential transit system improvements."

2030 Economic Element Implementation Strategy 16.2 states:

"Identify future economic corridor or district improvement areas to be targeted with refinement planning (e.g. Downtown to Gateway, Mid-Main to Mohawk, Urban Holding Areas)."

2030 Economic Element Implementation Strategy 16.3 states:

"Plan and zone land to maximize utilization of excellent exposure along Main Street/Highway 126B and Pioneer Parkway as future downtown commercial and employment development sites, as envisioned in the 2010 Downtown District Urban Design Plan."

2030 Economic Element Policy E.17 states:

"Leverage existing rail facilities and future expansion of rail facilities to achieve economic development objectives."

2030 Economic Element Implementation Strategy 17.4 states:

"Work with railroad industrial land specialist staff and Springfield property owners to conduct an inventory of Springfield's existing rail facilities and create a list of industrial sites with existing or previous rail service and/or potential for new service, including opportunities to utilize freight rail line connectivity between Springfield and the Coos Bay port."

2030 Economic Element Implementation Strategy 17.5 states:

"Consider how future expansion of rail freight will affect land use and avoid re-zoning industrial land with rail access to non-industrial uses, while allowing some conversion of existing industrial land to other employment uses, especially in high visibility areas such as the South A corridor east of Downtown, if uses are compatible with heavy rail impacts."

2030 Economic Element Policy E.18 states:

"Coordinate transportation and land use corridor planning to include design elements that support Springfield's economic and community development policies and contribute to community diversity and inclusivity."

2030 Economic Element Implementation Strategy 18.3 states:

“Establish preferred design concepts for key intersections along the corridor that integrate vehicle, pedestrian, bicycle and transit needs.”

2030 Economic Element Implementation Strategy 18.7 states:

“Prioritize improvements that would complete local connections to local shopping and service opportunities.”

Springfield’s existing acknowledged plan and zoning map designations, public facility plans, and transportation system plans, and Springfield Development Code land use regulations — as amended through adoption and acknowledgement of the 2030 Plan amendments — are adequate to implement policies the City and Lane County adopted pursuant to OAR 660-009-0020.

Conclusion OAR 660-009-0020(1)(c): The City’s 2030 Plan Amendments include policy commitments to provide an adequate number of suitable employment sites, types and locations and necessary public facilities and transportation facilities for the planning area.

OAR 660-009-0020(2)

“Plans for cities and counties within a Metropolitan Planning Organization or that adopt policies relating to the short-term supply of land, must include detailed strategies for preparing the total land supply for development and for replacing the short-term supply of land as it is developed. These policies must describe dates, events or both, that trigger local review of the short-term supply of land.”

2030 Economic Element Policy E.5 states:

“Provide an adequate, competitive short-term supply of suitable land to respond to economic development opportunities as they arise. “Short-term supply” means suitable land that is ready for construction within one year of an application for a building permit or request for service extension. “Competitive Short-term Supply” means the short-term supply of land provides a range of site sizes and locations to accommodate the market needs of a variety of industrial and other employment uses.”

The CIBL/EOA (pages 40-41) presents an analysis of short-term supply. Most of Springfield’s land supply within the existing UGB (91% of vacant commercial and industrial land and 85% of land with redevelopment potential) is considered short-term supply because land can be ready for construction within one year based on “engineering feasibility.” The short-term supply meets and exceeds the 25% threshold of OAR 660-009-0025 (3)(a).

Springfield has two urban renewal districts: Glenwood U.D. and Downtown U.D. Both districts have urban renewal plans and financing programs administered by the Springfield Economic Development Agency (SEDA) through the City Manager’s Office Economic Development Department. Programs provide support, as funds become available, to plan and prepare the land supply for redevelopment.

The urban renewal program, as funds allow, supports provision of a competitive short-term supply of land in Springfield providing a range of commercial, industrial and mixed-use site sizes and locations to accommodate the market needs of a variety of industrial and other employment uses.⁸⁹

Conclusion OAR 660-009-0020(2): The City and Lane County adopted 2030 Plan Economic Element Policy E.5 to state a commitment to providing a competitive short-term supply of land to accommodate industrial and other employment uses it selected through the economic opportunities analysis. The City and Lane County adopted 2030 Plan Urbanization Element text, policies and strategies describing how Springfield’s total supply of urbanizable land, including land in the short-term supply is planned and prepared for development.

OAR 660-009-0020(3)

“Plans may include policies to maintain existing categories or levels of industrial and other employment uses including maintaining downtowns or central business districts.”

As described in the CIBL inventory, the City’s 2030 Plan Amendments assume Springfield will maintain existing categories or levels of industrial and other employment uses as described in the Metro Plan and associated facilities plans. Any future amendments to existing categories or levels of industrial and other employment uses, policies or implementation strategies are addressed through future plan amendments. Existing categories or levels of industrial and other employment uses are assumed as described in the Metro Plan, associated facilities plans, and the Springfield Development Code.

As described on pages 74-84 of this report, the City’s 2030 Plan Amendments include policies and implementation strategies to support Downtown revitalization and redevelopment — maintaining and growing Springfield’s Downtown District as an important center of employment and commerce.⁹⁰

Conclusion OAR 660-009-0020(3): The 2030 Plan includes policies to maintain existing categories or levels of industrial and other employment uses including maintaining downtowns or central business districts.

OAR 660-009-0020(4)

“Plan policies may emphasize the expansion of and increased productivity from existing industries and firms as a means to facilitate local economic development.”

The City’s analysis of trends in the CIBL/EOA assumes the expansion of some existing industries and firms (e.g. Medical cluster) as a means to facilitate local economic development.

⁸⁹ For example, in 2016 SEDA is providing public assistance and financing support for infrastructure upgrades of Franklin Boulevard/McVay Highway and land assembly to assist in preparing Glenwood sites for redevelopment.

⁹⁰ In 2016, the City is updating its Downtown Design and Streetscape Development Standards through amendments to the Springfield Development Code and Engineering Design Standards Manual, with assistance from the Oregon TGM Code Assistance Program.

Conclusion OAR 660-009-0020(4): The CIBL/EOA and the City’s plan policies designate land and regulate land uses to provide a supply of suitable sites to accommodate expansion and increased productivity from existing industries and firms that are expected to grow in the 2010-2030 planning period.

OAR 660-009-0020(5)

“Cities and counties are strongly encouraged to adopt plan policies that include brownfield redevelopment strategies for retaining land in industrial use and for qualifying them as part of the local short-term supply of land.”

The City’s 2030 Plan Amendments include policies and implementation strategies to support brownfield redevelopment.

2030 Plan Economic Element Policy E.27 states:

“Support clean up and re-use of brownfields and contaminated sites as the opportunities for reuse arise.”

2030 Plan Economic Element Implementation Strategies 27.1 and 27.2 state:

“Provide public support to identify, assess, clean up and redevelop brownfields as resources become available through grants, SEDA, community partnerships and private investments.”

“Seek and leverage funding for brownfield assessment and clean up as one key tool to assist financing for redevelopment.”

The Springfield, Eugene and Lane County partnership has been successful in applying for, receiving and implementing EPA Brownfields Assessment Grants, demonstrating commitment to public support for assessment and clean-up of contaminated lands in the Metro area. As brownfields are assessed and cleaned up, commercial and industrial sites in Springfield’s inventory can be redeveloped with appropriate industrial and other employment uses.

“Encourage and support redesignation, rezoning, environmental clean-up and redevelopment of brownfields and older industrial sites to allow these lands to redevelop with clean industries and new uses, especially when located in the Willamette Greenway, adjacent to waterways and high value wetlands, and in Drinking Water Protection Zones 1-2 Year TOTZ areas. Provide information to businesses to encourage and facilitate environmental remediation, relocation, and/or redevelopment of these sites.”

Conclusion OAR 660-009-0020(5): Springfield and Lane County adopted 2030 plan Economic Element Policy policies and brownfield redevelopment strategies.

OAR 660-009-0020(6)

“Cities and counties are strongly encouraged to adopt plan policies pertaining to prime industrial land pursuant to OAR 660-009-0025(8).”

IVd. Employment Land Need - Uses with Special Siting Characteristics

OAR 660-009-0025(8) Uses with Special Siting Characteristics

“Cities and counties that adopt such objectives or policies providing for uses with special site needs must adopt policies and land use regulations providing for those special site needs. Policies and land use regulations for these uses must:

- (a) Identify sites suitable for the proposed use;*
- (b) Protect sites suitable for the proposed use by limiting land divisions and permissible uses and activities that interfere with development of the site for the intended use; and*
- (c) Where necessary, protect a site for the intended use by including measures that either prevent or appropriately restrict incompatible uses on adjacent and nearby lands.”*

OAR 660-009-0005(8) defines "Prime Industrial Land" as *“land suited for traded-sector industries as well as other industrial uses providing support to traded-sector industries. Prime industrial lands possess site characteristics that are difficult or impossible to replicate in the planning area or region. Prime industrial lands have necessary access to transportation and freight infrastructure, including, but not limited to, rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes. Traded-sector has the meaning provided in ORS 285B.280.”*

As encouraged to do so under OAR 660-009-0020(6), the City and County adopted 2030 Plan Amendments designating land suited for traded-sector industries as well as other industrial uses providing support to traded-sector industries. These industries and uses are identified in the CIBL/EOA. The City and County adopted 2030 Plan Amendments policies pertaining to uses with special site needs characteristics as identified and explained in the adopted CIBL/EOA. OAR 660-009-0025(8) states: *“Special site needs include, but are not limited to large acreage sites, special site configurations, direct access to transportation facilities, prime industrial lands, sensitivity to adjacent land uses, or coastal shoreland sites designated as suited for water-dependent use under Goal 17.”*

The City and County adopted 2030 Plan amendments to the UGB to provide 223 acres of suitable large site employment land. The amended UGB designates suitable large acreage sites — including sites larger than 20 acres — to accommodate target industrial and other employment uses. As previously described in this report under OAR 660-009-0015 (1), (2), (3) and (4) and as described and explained in the CIBL/EOA, needed site characteristics for Springfield target employers include but are not limited to unconstrained, serviceable sites larger than 20 acres with flat topography, access to public services and transportation facilities including public transit and designated truck routes. The City’s findings in this

report under Goal 14 describe and explain the City's UGB Alternatives Analysis process to assess the suitability and serviceability of lands it evaluated under ORS 198.298 and Goal 14.

The 2030 Plan amendments designate suitable, large, flat, unconstrained sites in the North Gateway and Mill Race areas to meet special site needs. The City and Lane County identified sites suitable for the proposed employment uses by adopting Ordinance Exhibit A designating these lands "Urban Holding Area-Employment" (UHA-E), and by adopting text amendments to the Metro Plan (Exhibit D) establishing and describing the UHA-E designation.

Exhibit D amends Chapter II, Section G. Metro Plan Land Use Designations to add a new land use designation applicable to Springfield's jurisdictional area of responsibility: Urban Holding Area – Employment. The text amendment inserts the following text on page II-G-9 (after Small-scale Light Industry and before Nodal Development Area):

Land Use Designations

Urban Holding Area – Employment (not shown on *Metro Plan* Diagram)

The Urban Holding Area – Employment (UHA-E) designation identifies urbanizable areas within the Springfield UGB to meet Springfield's long term employment land needs for the 2010-2030 planning period. The UHA-E designation reserves an adequate inventory of employment sites, including sites 20 acres and larger, that are suitable for industrial and commercial mixed use employment uses that generate significant capital investment and job creation within — but not limited to — targeted industry sectors, business clusters and traded-sector industries identified in the most recent Springfield economic opportunities analysis and Springfield Comprehensive Plan Economic Element policies.

Lands designated UHA-E are protected from land division and incompatible interim development to maintain the land's potential for planned urban development until appropriate urban facilities and services are planned or available and annexation to Springfield can occur, as described in the Springfield Comprehensive Plan Urbanization Element. The UHA-E designation remains in effect until the appropriate employment designation is adopted through a City-initiated planning process or an owner-initiated plan amendment process.

The City and Lane County adopted plan policies to reserve the sites it added to the UGB to meet the needs of target industries identified in CIBL/EOA. The policies identify and protect sites suitable for the proposed uses by limiting land divisions and permissible uses and activities that interfere with development of the site for the intended use.

2030 Plan Urbanization Element Policy 4 states:

“Urbanizable lands added to Springfield’s acknowledged UGB by Ordinance ____, date ____ to meet employment needs are designated “Urban Holding Area- Employment” (UHA-E) in the Metro Plan consistent with the employment site needs criteria for their inclusion in the UGB.⁹¹ The UHA-E designation reserves employment sites within urbanizable areas of 50 or more suitable acres to support creation of economic districts that will accommodate the site needs of target employment sectors. The size of employment districts and parcels of urbanizable land designated UHA-E shall be of adequate dimension so as to maximize the utility of the land resource and enable the logical and efficient extension of infrastructure to serve the North Gateway or Mill Race urbanizable area.”

2030 Plan Urbanization Element Policy 5 states:

“Lands designated UHA-E are planned and zoned for the primary purpose of reserving an adequate inventory of large employment sites that is well located and viable for industry and not easily replicable elsewhere for employment uses that generate:

- ***A significant capital investment;***
- ***Job creation within — but not limited to — targeted industry sectors, business clusters and traded-sector⁹² industries identified in the most recent economic opportunities analysis and Economic Element policies of this Plan.”***

2030 Plan Urbanization Element Policy 11 states:

“Plan and zone land within the UHA-E designation to provide suitable employment sites 20 acres and larger to accommodate clean manufacturing uses and office/tech/flex employers in Springfield’s target industry sectors. Limited neighborhood-scale retail uses that primarily serve employees within an industrial or office building or complex may be permitted as a secondary element within employment mixed-use zones. Urban Holding Area-Employment (UHA- E) sites shall not be re-designated or zoned to permit development of regional retail commercial uses.”

2030 Plan Urbanization Element Policy 6 states:

“Lands designated “Urban Holding Area-Employment” are zoned “Agriculture – Urban Holding Area” (AG) on the Springfield Zoning Map and are subject to the development standards of the Springfield Development Code AG Zoning District.”

⁹¹ Employment site needs are explained in the Economic Element of this Plan, and in the Springfield Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis, 2015.

⁹² ORS 285A.010(9)

The City is bringing land into the UGB to accommodate the need for large employment sites. The following policies restrict land division to protect those large sites for employers that need large sites.

2030 Plan Urbanization Element Policy 7 states:

“For lots/parcels greater than 50 acres in the North Gateway UHA-E District, the minimum lot/parcel size for land division is 50 acres. Land divisions that create lots/parcels for the purpose of establishing a Natural Resource or Public/Semi-Public Parks and Open Space designation within the floodway, wetland or riparian resource portions of the site may create lots/parcels less than 50 acres within the Natural Resource or Public/Semi-Public Parks and Open Space designation portion of the parent lot/parcel. Lots/parcels created and designated for employment purposes shall retain the 50-acre minimum until planned and zoned to allow annexation and site development with urban employment uses and densities consistent with the policies of this Plan.”

The following policy requires retention of large parcels. The area’s existing Lane County zoning is EFU-25 (25-acre minimum).

2030 Plan Urbanization Element Policy 8 states:

“For lots/parcels less than 50 acres in the North Gateway and Mill Race UHA-E Districts, the minimum lot/parcel size for land division is 20 acres. Land divisions that create lots/parcels for the purpose of establishing a Natural Resource or Public/Semi-Public Parks and Open Space designation within the floodway, wetland or riparian resource portions of the site may create lots/parcels less than 20 acres within the Natural Resource or Public/Semi-Public Parks and Open Space designation portion of the lot/parcel. Lots/parcels created and designated for employment purposes shall retain the 20-acre minimum until planned and zoned to allow annexation and site development with urban employment uses and densities consistent with the policies of this Plan.”

The City’s 2030 Plan amendments apply the “Agriculture-Urban Holding Area” (AG) zone to the lands it designated “Urban Holding Area- Employment” (UHA-E). The UHA-E sites were included in the UGB to provide suitable, large, flat, unconstrained sites to meet special site needs. Urbanization Element policies are implemented through the land use regulations of the AG zone — protecting sites suitable for the proposed employment uses by limiting land divisions and permissible uses and activities that would interfere with development of the site for the intended use. The City and Lane County adopted Ordinance Exhibit E amending the Springfield Development Code to establish the AG zone and Exhibit A amending the Springfield zoning map to apply the zone.

The City and Lane County adopted Ordinance Exhibit C-1 and by adopting adopted policies and land use regulations for these uses. The City and Lane County previously designated and zoned land within the

existing UGB to provide for uses with special site needs and adopted policies and land use regulations that identify sites suitable for special uses —such as the Campus Industrial District.⁹³

Conclusion OAR 660-009-0020(6), OAR 660-009-0025(8): As encouraged to do so under OAR 660-009-0020(6), the City and Lane County adopted 2030 Plan Amendments designating land suited for traded-sector industries as well as other industrial uses providing support to traded-sector industries. These industries and uses are identified in the CIBL/EOA. The City and County adopted 2030 Plan Amendments policies pertaining to uses with special site needs characteristics as identified and explained in the adopted CIBL/EOA.

OAR 660-009-0020(7)

“Cities and counties are strongly encouraged to adopt plan policies that include additional approaches to implement this division including, but not limited to:

- (a) Tax incentives and disincentives;*
- (b) Land use controls and ordinances;*
- (c) Preferential tax assessments;*
- (d) Capital improvement programming;*
- (e) Property acquisition techniques;*
- (f) Public/private partnerships; and*
- (g) Intergovernmental agreements.”*

The City’s CIBL/EOA includes aggressive assumptions about redevelopment and about projected employment in non-employment designations.

The city supports its assumptions about accommodating employment growth and redevelopment through its adoption and implementation of proactive and aggressive redevelopment planning policies and implementation plans, including but not limited to:

- Establishment of TIF financing programs (Downtown and Glenwood Urban Renewal Districts);
- Recent adoption of the Glenwood Refinement Plan Phase One plan and zoning amendments;

⁹³ Metro Plan p. II-G-7 describes existing industrial and other employment land use designation districts and identifies special site needs for land uses. For example: Heavy Industrial (energy intensive, large scale storage needs, truck and rail transportation needs); Campus Industrial (“50-acre minimum applied to ownerships of 50 or more acres to protect sites from piecemeal development until a site development plan has been approved by the responsible city; firms are enclosed within attractive exteriors and have minimal environmental impacts, such as noise, pollution and vibration, adequate circulation, compatibility with adjacent areas;” Special Heavy Industrial (40-acre minim parcel size); Nodal Development (transit stop within walking distance, design element that support pedestrian environments,, public spaces such as parks, that can be reached without driving”). Springfield’s Refinement Plans and SDC Plan Districts identify special site needs for land uses.

- Recent adoption of Downtown District Urban Design Plan and Implementation Strategy;
- Work in progress (2016-2017) to prepare and adopt Downtown Design Standards amendments to the Springfield Development Code and Engineering Design Standards Manual.
- Initiation of the Main Street Corridor Plan project (with support from the TGM program and EPA); Vision Plan adopted February 2015.
- Conducting assessment work to identify and prioritize Brownfield redevelopment sites (EPA grant);
- Continued political and policy level support for high frequency transit service implementation to support goals for improved multi-modal mobility, equity, air quality, housing choice, connectivity and transit-oriented economic development in Springfield;
- Participation in educational programs that seek to forge a more sustainable future through collaboration between local government, education and agency partnerships (University of Oregon Sustainable Cities Year City 2012-2013);
- Participation in federal programs that support coordinated land use, transportation, housing and environmental planning to build equitable and sustainable regions and communities (HUD Sustainable Communities Grant recipient 2012-2013 Lane Livability Consortium).

Conclusion OAR 660-009-0020(7): The City's 2030 Plan Amendments include policies and implementation strategies to implement economic development, including but not limited to the City's existing urban renewal districts tax increment financing program, the Capital Improvement Program, public/private partnerships, land use controls and ordinances and intergovernmental agreements.

Conclusion OAR 660-009-0020: The City's 2030 Plan Amendments are consistent with the requirements of OAR 660-009-0020.

IVe. Plan Designations and Zoning

OAR 660-009-0025 Designation of Lands for Industrial and Other Employment Uses

"Cities and counties must adopt measures adequate to implement policies adopted pursuant to OAR 660-009-0020. Appropriate implementing measures include amendments to plan and zone map designations, land use regulations, public facility plans, and transportation system plans."

OAR 660-024-0050(6) local government must assign appropriate urban plan designations to the land added to the UGB, consistent with the need determination

"When land is added to the UGB, the local government must assign appropriate urban plan designations to the added land, consistent with the need determination. The local

government must also apply appropriate zoning to the added land consistent with the plan designation or may maintain the land as urbanizable land until the land is rezoned for the planned urban uses, either by retaining the zoning that was assigned prior to inclusion in the boundary or by applying other interim zoning that maintains the land's potential for planned urban development. The requirements of ORS 197.296 regarding planning and zoning also apply when local governments specified in that statute add land to the UGB.”

Continued reliance on existing plans and zoning; establishment of new plan designation and interim land use regulations to designate and zone land to accommodate employment uses with special siting characteristics. Existing Metro plan designations establish the land base used to conduct the CIBL/EOA.⁹⁴ Springfield and Lane County will continue to rely on existing acknowledged plans and implementation measures (existing Springfield zoning designations, existing land use regulations, the existing Metro Public Facilities and Services Plan, and the existing Springfield Transportation System Plan) to implement the majority of the new 2030 Plan Economic Element and Urbanization Element policies as they are applicable to lands located inside the existing UGB. Land designated for industrial and other employment uses in existing acknowledged plans⁹⁵, as provided with services pursuant to existing facilities and transportation plans, and as regulated through existing implementation measures, will provide employment growth sites for commercial and industrial uses that require sites smaller than 5 acres.

2030 Urbanization Element Policy 1 states:

“Urbanizable lands within the 2030 UGB shall be converted to urban uses as shown in the Metro Plan Diagram and as more particularly described in neighborhood refinement plans, other applicable area-specific plans, and the policies of this Plan.”

2030 Urbanization Element Policy 2 states:

“Continue to support and facilitate redevelopment and efficient urbanization through City-initiated area-specific refinement planning and zoning amendments consistent with the policies of this Plan. Plans shall designate an adequate and competitive supply of land to facilitate short-term and long-term redevelopment activity. Efficiency measures achieved through plan amendments may be reflected in land supply calculations to the extent that they are likely to increase capacity of land suitable and available to meet identified needs during the relevant planning period.”

⁹⁴ As shown in CIBL/EOA Map 2-1, (p. 13) “CIBL Plan Designations”; Table 2-1, (p. 7) “Metro plan designations included in the Springfield commercial and industrial buildable lands inventory, 2008”

⁹⁵ The recent Central Lane MPO Scenario Planning process provides data and documentation regarding land use and transportation outcomes associated with Metro area build-out under existing land use and facilities plans policies, and through implementation of adopted land use plans, facilities projects and programs. Scarcity of federal, state and local funding impedes construction of needed transportation and facilities projects, thus constraining implementation of existing policies.

With one exception (Exhibit E), existing zoning measures already in place are adequate to implement new 2030 plan policies and to meet Springfield's employment land on sites smaller than 5 acres. The new 2030 plan policies provide additional policy support for economic development in Springfield — such as public planning and financing incentives for redevelopment and mixed-use development to meet Springfield's employment land for sites smaller than 5 acres.

Amending the UGB and designating land to accommodate employment uses with special siting characteristics. As previously explained in the City's findings under OAR 660-009-0020(6) and OAR 660-009-0025(8) on pages 82-86 of this report, to improve local economic opportunities by raising wages in Springfield, the City and Lane County adopted 2030 Plan policies and amended the UGB to add 223 acres of land to accommodate large employers with special siting characteristics. The employment land included in the UGB amendment provides suitable sites for Springfield's target traded sector industries as well as other industrial and employment uses providing support to traded sector industries. Ordinance Exhibit A-1 and A-2 shows the lands added and designated "Urban Holding Area – Employment."

The 2030 Plan amendments, Exhibit B-2 adopted the 2015 CIBL/EOA into the comprehensive plan as a Technical Supplement. CIBL/EOA Map 2-1, p. 13 (lands within the existing UGB) and Exhibit A-2 Metro Plan Designations (lands within the amended UGB) identify the lands designated industrial and other employment uses in the Springfield UGB and comprehensive plan.

By adopting the 2030 Plan amendment ordinance, Springfield and Lane County designated a 20-year (2010-2030) total supply of serviceable land suitable to meet the site needs for industrial and other employment uses for Springfield's planning area, as required by OAR 660-009-0025(2).

By adopting the 2030 Plan amendment ordinance, Springfield and Lane County adopted new 2030 Plan Economic Element and Urbanization Element policies:

- Springfield 2030 Comprehensive Plan Economic Element Exhibit B
 - Exhibit B-1 Economic Element
 - Exhibit B-2 Technical Supplement: CIBL/EOA, 2015
- Springfield 2030 Comprehensive Plan Urbanization Element Exhibit C
 - Exhibit C-1 Urbanization Element including UGB Map
 - Exhibit C-2 UGB Technical Supplement

By adopting the 2030 Plan amendment ordinance, Springfield and Lane County adopted new measures to implement the policies adopted pursuant to OAR 660-009-0020 addressing the need for land with special siting characteristics⁹⁶ as described in OAR 660-009-0025(8) including suitable employment sites larger than 5 acres:

⁹⁶ CIBL/EOA pp. 82-98 identifies target large-scale manufacturers and large office employers that require sites with special characteristics including: site size 20 acres and larger, topography less 5 % / 7%,

- Exhibit A-1: Springfield UGB amendment
- Exhibit A-2: Metro Plan designations establishing the “Urban Holding Area – Employment” designation to implement Urbanization Element policies
- Exhibit A-3: Springfield zoning map amendments
- Exhibit D: Metro Plan text amendments
- Exhibit E: Springfield Development Code amendment establishing the “Agriculture – Urban Holding Area” zoning district to protect large urbanizable sites added to the UGB from land division and incompatible interim uses

2030 Urbanization Element Policy 4 states:

“Urbanizable lands added to Springfield’s acknowledged UGB by Ordinance [REDACTED], date [REDACTED] to meet employment needs are designated “Urban Holding Area-Employment” (UHA-E) in the Metro Plan consistent with the employment site needs criteria for their inclusion in the UGB. The UHA-E designation reserves employment sites within urbanizable areas of 50 or more suitable acres to support creation of economic districts that will accommodate the site needs of target employment sectors. The size of employment districts and parcels of urbanizable land designated UHA-E shall be of adequate dimension so as to maximize the utility of the land resource and enable the logical and efficient extension of infrastructure to serve the North Gateway or Mill Race urbanizable area.”

2030 Urbanization Element Policy 5 states:

“Lands designated UHA-E are planned and zoned for the primary purpose of reserving an adequate inventory of large employment sites that is well located and viable for industry and not easily replicable elsewhere for employment uses that generate:

- ***A significant capital investment;***
- ***Job creation within — but not limited to — targeted industry sectors, business clusters and traded-sector industries identified in the most recent economic opportunities analysis and Economic Element policies of this Plan.”***

2030 Urbanization Element Policy 6 states:

“Lands designated “Urban Holding Area-Employment” are zoned “Agriculture – Urban Holding Area” (AG) on the Springfield Zoning Map and are subject to the development standards of the Springfield Development Code AG Zoning District.”

2030 Urbanization Element Policy 7 states:

transportation access as close to I-5 as possible via unimpeded freight route, access to public facilities and services, and sites with two or fewer owners.

“For lots/parcels greater than 50 acres in the North Gateway UHA-E District, the minimum lot/parcel size for land division is 50 acres. Land divisions that create lots/parcels for the purpose of establishing a Natural Resource or Public/Semi-Public Parks and Open Space designation within the floodway, wetland or riparian resource portions of the site may create lots/parcels less than 50 acres within the Natural Resource or Public/Semi-Public Parks and Open Space designation portion of the parent lot/parcel. Lots/parcels created and designated for employment purposes shall retain the 50-acre minimum until planned and zoned to allow annexation and site development with urban employment uses and densities consistent with the policies of this Plan.”

2030 Urbanization Element Policy 8 states:

“For lots/parcels less than 50 acres in the North Gateway and Mill Race UHA-E Districts, the minimum lot/parcel size for land division is 20 acres. Land divisions that create lots/parcels for the purpose of establishing a Natural Resource or Public/Semi-Public Parks and Open Space designation within the floodway, wetland or riparian resource portions of the site may create lots/parcels less than 20 acres within the Natural Resource or Public/Semi-Public Parks and Open Space designation portion of the lot/parcel. Lots/parcels created and designated for employment purposes shall retain the 20-acre minimum until planned and zoned to allow annexation and site development with urban employment uses and densities consistent with the policies of this Plan.”

The UGB amendment as adopted in Exhibit A-1 and new “Urban Holding Area – Employment” plan designation as adopted in Exhibit A-2 and described in Exhibit D are adequate to implement new 2030 Plan policies designating and reserving suitable sites for target industry employers that require large sites, including sites larger than 20 acres. The sites designated “Urban Holding Area – Employment” support creation of planned economic districts to accommodate the site needs of target employment sectors. The size of employment districts and parcels of urbanizable land designated UHA-E is of adequate dimension to maximize the utility of the land resource and to enable the logical and efficient extension of infrastructure (as described in the City’s public facilities analysis findings under Goal 14).

The sites designated “Urban Holding Area – Employment” comprise suitable large parcels of land free of absolute development constraints and possessing site attributes and characteristics to match the site operational needs of target industries of identified in the CIBL/EOA Chapter 4 and Appendix C.

The suitable employment sites designated “Urban Holding Area – Employment” included in the amended UGB are designated to implement the Urbanization Element policies adopted pursuant to OAR 660-009-0020 to address the need for sites larger than 5 acres, including sites larger than 20 acres. 2030 Urbanization Element Policy 7 and Policy 8 prevent land divisions below 50 acres for 50-acre sites and below 20 acres for sites less than 50 acres.

The new AG zone adopted in Exhibit A-3 and Exhibit E is adequate to implement these Economic and Urbanization Element policies adopted pursuant to OAR 660-009-0020 to address the need for sites larger than 5 acres and sites larger than 20 acres because the zoning ordinance prevents land divisions below 20 acres and allows only interim uses that do not preclude use of the site by large employers.

The City and Lane County adopted policies requiring facilities planning and transportation planning applicable to the lands designated “Urban Holding Area – Employment” prior to any re-designation or zoning map amendment that allows urbanization.

2030 Urbanization Element Policy 9 states:

“As directed by the City Council, the City will conduct comprehensive planning processes and adopt refinement-level plans and implementation measures to guide and regulate urban development in the North Gateway and Mill Race UHA-E districts. The Transportation Planning Rule requirements under OAR 660-012-0060 will be addressed prior to any re-designation or zoning map amendment that allows urbanization.”

2030 Urbanization Element Policy 37 states:

“Prior to re-designating and rezoning land designated Urban Holding Area-Employment, the City shall update and adopt amendments to the Eugene-Springfield Metropolitan Public Facilities and Services Plan (PFSP) that may be needed to identify new facilities or major modification of facilities needed to serve development of urban employment uses within the North Gateway or Mill Race districts as necessary to demonstrate accordance with statewide planning Goal 11 and Goal 11 administrative rules requirements and the policies of Metro Plan Chapter III-G Public Facilities Element of the Metro Plan.”

2030 Urbanization Element Policy 38 states:

“To ensure that changes to the Springfield Comprehensive Plan are supported by adequate planned transportation facilities, the City shall update and adopt amendments to the Springfield Transportation System Plan (TSP) to identify facilities that may be needed to provide and encourage a safe, convenient and economic multi-modal transportation system to support development of urban uses and densities in the North Gateway and Mill Race areas. The TSP update shall be coordinated with City-initiated comprehensive land use planning or owner-initiated plan amendments and shall be prepared and adopted prior to or concurrently with any plan or zoning amendment that allows an increase in trips over the levels permitted in the AG zone.”

Conclusions OAR 660-009-0025: The City and Lane County adopted measures that are adequate to augment existing Metro Plan plan designations to implement the new 2030 Plan policies adopted under OAR 660-009-0020. The 2030 Plan amendments establish Springfield’s 20-year total land supply for industrial and other employment uses. The City and Lane County adopted policies requiring a PAPA process to update public facilities and transportation system plans as necessary prior to land use approval that allows urban uses and urban levels of use on newly urbanizable lands included in the UGB amendment.

IVf. Identification of Needed Sites

OAR 660-009-0025(1) Identification of Needed Sites

“The plan must identify the approximate number, acreage and site characteristics of sites needed to accommodate industrial and other employment uses to implement plan policies. Plans do not need to provide a different type of site for each industrial or other employment use. Compatible uses with similar site characteristics may be combined into broad site categories. Several broad site categories will provide for industrial and other employment uses likely to occur in most planning areas. Cities and counties may also designate mixed-use zones to meet multiple needs in a given location.”

Demand for sites. The CIBL/EOA identifies the approximate number, acreage and characteristics of sites needed to accommodate industrial, office and retail uses to meet Springfield’s long term land and site needs. Table 4-5 (p. 73) shows site needs by site size and building type for the Springfield UGB from 2010 to 2030. Appendix A, p. 127 provides data and rationale to explain how ECO converted employment to building types using NAICS sectors and how the analysis used data on covered employment and business clusters to inform the projection of needed building and site types. Maps A-1 and A-2 (p. 125-126) show how ECO analyzed employment by size and employer type and how employers are distributed across plan designations and throughout Springfield. ECO grouped industries based on building and site characteristics, as explained on the top of page 127. Table A-9 (p. 128) shows how employment is distributed within plan designations, based on Oregon QCEW and GIS data. Table A-11 (p. 129) shows percent of employees by building type and site sizes. Table A-12 (p. 132) categorizes industries with high and low growth projection for Lane County and concentration of these industries in Springfield.

Table 4-5. Estimated needed sites by site size and building type, Springfield, 2010 to 2030

	Site Size (acres)					Total
	Less than 1	1 to 2	2 to 5	5 to 20	20 and Larger	
Warehousing & Distribution	2	2	3	4	1	12
General Industrial	5	5	4	8	2	24
Office	75	12	13	4	1	105
Retail	55	10	6	2		73
Other Services	44	9	4	2		59
Total	181	38	30	20	4	273

Source: ECONorthwest

Land demand and needed sites in Springfield are described and quantified in Chapter 4. Appendix C presents the process ECONorthwest used to convert between employment forecast to site needs. Table 4-5 (p. 73) presents the estimate of needed sites by site size and building type, showing that Springfield needs to provide 273 sites to accommodate employment growth in targeted building type categories between 2010 and 2030. The majority of sites (219 sites) will be two acres or smaller. Springfield needs approximately 24 sites larger than 5-acres, including 4 sites larger than 20-acres.

The identified site needs shown in Table 4-5 do not distinguish sites by comprehensive plan designation. It is reasonable to assume that industrial uses will primarily locate in industrial or campus industrial zones. Retail and service uses could locate in commercial zones, mixed use zones, and residential mixed-use zones.

Table 4-2, page 69 shows existing Metro plan designations where Springfield's target industry types are permitted within the designated land supply — if sites possessing the industry's needed site size and site characteristics were available.⁹⁷

⁹⁷ See pages 42-43 of this report OAR 660-009-0015(2) Identification of Required Site Types.

Target Industry	Plan Designation										
	Campus Industrial	Commercial	Commercial Mixed Use	Heavy Industrial	High Density Residential Mixed Use	Light Medium Industrial	Light Medium Industrial Mixed Use	Major Retail Center	Medium Density Residential Mixed Use	Mixed Use	Special Heavy Industrial
Medical Services		✓	✓		✓		✓		✓	✓	
Services for Seniors		✓	✓		✓			✓	✓	✓	
Manufacturing	✓			✓		✓	✓			✓	✓
Specialty Food Processing	✓			✓		✓	✓			✓	✓
High-Tech	✓					✓	✓			✓	✓
Professional and Technical Services	✓	✓	✓		✓		✓	✓	✓	✓	
Call Centers	✓		✓				✓			✓	
Back Office Functions	✓		✓			✓	✓			✓	
Tourism		✓	✓				✓	✓		✓	
Green Businesses	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Corporate Headquarters	✓	✓	✓		✓		✓		✓	✓	
Services for Residents		✓	✓		✓		✓	✓	✓	✓	
Government and Public Services	✓	✓	✓							✓	

The city's findings in this report under OAR 660-009-0015(1) Review of Trends, and the City's findings under OAR 660-009-0015(4) Assessment of Community Economic Development Potential describe and reference Springfield's locational factors in relationship to future industrial and other employment uses.⁹⁸ The city's findings in this report under OAR 660-009-0015 (2) Identification of Required Site Types, on pages 45-49 addressed site characteristics typical of expected uses. As permitted under OAR 660-009-0015(2) Industrial or other employment uses with compatible site characteristics were grouped together into common site categories.

Characteristics of needed sites are identified and explained in CIBL/EOA Chapter 5 (pp. 82-98 and Appendix C). Appendix A provides employment location and building/site type NAICS data.

20-year employment land demand compared with land supply. Chapter 5 of the CIBL/EOA Land Capacity and Demand (pp. 77-98) compares the demand for sites with available land in Springfield's inventory. Table 5-1 (p. 78) compares the inventory of vacant and potentially redevelopable sites with Springfield's land need by site size and type (industrial or commercial and mixed use). The City and Lane County adopted the CIBL inventory and policy commitments to support, enable and foster redevelopment, reducing the need to expand the UGB.⁹⁹ As explained in the CIBL/EOA Inventory, Table 2-12 (CIBL/EOA p. 33-38), the City assumes that 7 potentially redevelopable sites 5 acres and larger offer redevelopment opportunities in the 2010-2030 planning period. The results of the evaluation of tax lots in Table 2-12 show that one of the seven potentially redevelopable sites is larger than 20 acres and six of the potentially redevelopable sites are 5-20 acres in size.

⁹⁸ See pages 31-45 of this report. Potential growth industries are discussed on p. 43 of this report.

⁹⁹ As explained on p. 67-88 of this report. The City's evaluation of redevelopable land, including a parcel-level evaluation of sites 5 acres and larger with redevelopment potential is explained in the CIBL/EOA pp. 27-39.

Table 5-2 (p, 78) converts site needs to needed acres by applying average site size in Springfield. Table 5-3 summarizes site needs. Table 5-4 reduces land need by applying an assumption that need for sites smaller than 5 acres will be met within the existing UGB.¹⁰⁰

	Site Size (acres)			Total
	Less than 5	5 to 20	20 and Larger	
Industrial				
Sites needed	none	none	2	2
Land need (acres)	none	none	126	126
Commercial and Mixed Use				
Sites needed	none	4	1	5
Land need (acres)	none	37	60	97
Total sites needed	none	4	3	7
Total acres needed	none	37	186	223

Source: ECONorthwest

Total land supply to meet site needs by plan designation. The CIBL/EOA Chapter 2, pp. 5-42 explains the inventory of lands, how lands were classified and how the existing inventory will provide or not provide land designated to meet the site needs. Table 2-4 shows that about 28% of land in Springfield’s existing UGB is in the CIBL land base. Map 2-2 (p. 20) shows how lands were classified in the inventory. Table 2-5 (p. 18) shows location of land by plan designation.

Suitable land supply to meet site needs. Table 2-6 (p. 19) shows employment land base acres by plan designation and constraint status, including employment allocated to sites pursuant to City-approved Master Plans. Table 2-6 and Table 2-7 (pp. 19, 21) show how the presence of absolute constraints on acres in tax lots affects the inventory. Table 2-6 shows that a total of 608 acres of land designated for employment in 2008 are unsuitable due to presence of absolute development constraints (floodway, slopes >15%, wetlands, riparian resource areas). It should be noted that Springfield’s inventory counted flood plain acres as buildable acres. Only flood way was considered unbuildable. Map 2-4 (p. 25) shows areas with absolute constraints. Map 2-5 (p. 26) shows areas with partial constraints (flood plain, Willamette River Greenway and BPA easements). Table 2-7 (p. 21) shows that 277 acres of potentially redevelopable and vacant sites are unsuitable to meet land needs because those acres have absolute constraints. Table 2-9 (p. 23) shows data to evaluate how vacant land is distributed by parcel size. It is important to note that the results of the Table 2-9 evaluation show that the City has no vacant tax lots 20 acres and larger.

Total land supply to meet site needs includes “potentially redevelopable” land. CIBL/EOA pp. 27-39 presents data and analysis to evaluate opportunities in Springfield to accommodate employment growth on existing sites in the UGB through redevelopment. Only redevelopment that adds capacity for more employment on a site is relevant in the context of the inventory. As stated on p. 27, an operational definition of redevelopment that would apply to the inventory is:

¹⁰⁰ As explained in CIBL/EOA p. 79

“Redevelopment is development that occurs on a tax lot that creates more employment space or capacity than the current use, and thus an increase in density of a tax lot.”

The rationale and criteria employed by ECONorthwest to classify sites as potentially redevelopable is explained in CIBL/EOA pp. 27-31. The public process used to inform criteria selection and application is fully documented in the record. Table 2-10 shows results of applying the criteria to tax lots in the land base. These results were evaluated and it was determined that the significant amount of land in the “lower potential” category (28% of the City’s total employment land base and more than 20% of Springfield’s covered employment —7,107 jobs) suggested limited redevelopment potential to replace existing uses with uses with more employment. As explained on in CIBL/EOA page 30:

“...land that has more employment on it, and/or higher improvement value is already in a higher use. The economics of real estate development make it less desirable to redevelop land with substantial employment on it — in large part because it has tenants that are paying leases. Thus, the “lower potential” category is not included as part of the redevelopable base.”

The City explained the criteria used to categorize and rationale used to identify potentially redevelopable land. The City’s explanation is reasonable and based on the professional judgment of the City’s consultant ECONorthwest, with input from the public, Planning Commission and City Council.

Conclusions OAR 660-009-0025(1) and (2): The 2030 Plan amendments identify the approximate number, acreage and site characteristics of sites needed to accommodate industrial and other employment uses to implement plan policies. The 2030 Plan amendments designate serviceable land suitable to meet the identified site needs, including land to meet the needs of uses with special siting characteristics identified in OAR 660-009-0025(8). The 2030 Plan amendments designate serviceable land consistent with the policy direction found in the CIBL/EOA and Comprehensive Plan. The total acreage of land designated is at least equal to the total projected land needs for each industrial or other employment use category identified in the plan during the 20-year planning period.

After accounting for available land supply and the results of efficiency measures, Table 5-4 of the CIBL/EOA identifies employment needs that require expansion of the UGB as follows:

Commercial and Mixed-Use (Land Need = 5 sites, 97 acres). After accounting for vacant, partially-vacant and potentially redevelopable commercial and mixed use land supply within the UGB, there is an unmet need for 5 commercial and mixed-use sites totaling an estimated 97 acres.

Industrial (Land Need = 2 sites, 126 acres). After accounting for vacant, partially-vacant and potentially redevelopable industrial land supply within the UGB, unmet industrial need is identified as 2 large sites, totaling an estimated 126 acres.

Total land needed in the UGB expansion of 223 suitable acres: 3 sites larger than 20 acres and 4 sites 5-20 acres.

The sites needed in the UGB expansion to meet special site needs meet the site requirements described on pages 82-95 of the CIBL/EOA Characteristics of Needed Sites.

OAR 660-009-0025 (3) Short-Term Supply of Land

“Plans for cities and counties within a Metropolitan Planning Organization or cities and counties that adopt policies relating to the short-term supply of land must designate suitable land to respond to economic development opportunities as they arise. Cities and counties may maintain the short-term supply of land according to the strategies adopted pursuant to OAR 660-009-0020(2).”

(a) Except as provided for in subsections (b) and (c), cities and counties subject to this section must provide at least 25 percent of the total land supply within the urban growth boundary designated for industrial and other employment uses as short-term supply.

(b) Affected cities and counties that are unable to achieve the target in subsection (a) above may set an alternative target based on their economic opportunities analysis.

OAR 660-009-0020 (1)(b) and OAR 660-009-0025 (3) Conclusion: The CIBL/EOA provides an analysis of short-term supply on pages 40-41 to demonstrate that most of Springfield’s land supply within the existing UGB (91% of vacant commercial and industrial land and 85% of land with redevelopment potential) is considered short-term supply because land can be ready for construction within one year based on “engineering feasibility.” Thus the short-term supply meets and exceeds the 25% threshold of OAR 660-009-0025 (3)(a). The City and Lane County adopted Economic Element Policy E.5 to state commitment to providing a competitive short-term supply of land to accommodate industrial and other employment uses it selected through the economic opportunities analysis.

OAR 660-009-0025(4)

“Subsequent implementation of or amendments to the comprehensive plan or the public facility plan that change the supply of serviceable land are not subject to the requirements of this section.”

(a) “Identify serviceable industrial and other employment sites. The affected city or county in consultation with the local service provider, if applicable, must make decisions about whether a site is serviceable. Cities and counties are encouraged to develop specific criteria for deciding whether or not a site is serviceable. Cities and counties are strongly encouraged to also consider whether or not extension of facilities is reasonably likely to occur considering the size and type of uses likely to occur and the cost or distance of facility extension;”

The City's 2030 Plan amendments to the Metro Plan comprehensive plan change the supply of serviceable land and thus are not subject to the requirements of OAR 660-009-0025(4). Though not required to do so, the City conducted a considerable amount of comparative analysis to identify serviceable industrial and other employment sites, with the intent of providing suitable, serviceable lands in the near term to meet its economic development objectives.

As explained in the CIBL/EOA Inventory and discussion of development constraints in Chapter 2 (pp. 8-17), and as documented in the record, the City consulted with local service providers to make decisions about whether a site is serviceable. As fully explained in the City's findings under Goal 14 Public Facilities Analyses, the City consulted with local service providers to make decisions about whether a site is serviceable; developed specific criteria for deciding whether or not a site is serviceable; and considered whether or not extension of facilities is reasonably likely to occur considering the size and type of uses likely to occur and the cost or distance of facility extension.

OAR 660-009-0025(5) Institutional Uses

"Cities and counties are not required to designate institutional uses on privately owned land when implementing section (2) of this rule. Cities and counties may designate land in an industrial or other employment land category to compensate for any institutional land demand that is not designated under this section."

As permitted under OAR 660-009-0025 (5) Cities and counties may designate land in an industrial or other employment land category to compensate for any institutional land demand that is not designated under this section.

OAR 660-009-0025 (6) Compatibility.

"Cities and counties are strongly encouraged to manage encroachment and intrusion of uses incompatible with industrial and other employment uses. Strategies for managing encroachment and intrusion of incompatible uses include, but are not limited to, transition areas around uses having negative impacts on surrounding areas, design criteria, district designation, and limiting non-essential uses within districts."

The Springfield Development Code includes district designations, use limitations and development standards to address land use compatibility. These include requirements for landscaped setbacks between zoning districts, design criteria for Campus Industrial, Nodal Development, Mixed Use Employment and Mixed Use Commercial plan designations and zoning districts.

The 2030 Plan amendments establish the AG land use zoning district (Ordinance Exhibit E) to support transition of land from rural agriculture uses to urban employment uses — including provisions to limit interim development on lands added to the UGB to meet large site employment needs. The AG

development standards manage encroachment in the Urban Holding Area – Employment plan designation by prohibiting intrusion of incompatible uses.¹⁰¹

OAR 660-009-0025(7) Availability

“Cities and counties may consider land availability when designating the short-term supply of land. Available land is vacant or developed land likely to be on the market for sale or lease at prices consistent with the local real estate market. Methods for determining lack of availability include, but are not limited to...

The City did not consider land availability when designating the short-term supply of land. CIBL/EOA (page 40-41, Table 2-13) provides an analysis of short-term supply of land. For purposes of Goal 9, the City assumes 91% of the vacant buildable land acres designated for employment uses and 85% of land with redevelopment potential within the existing UGB is available as short-term supply. Buildable land in the Jasper-Natron area is the only area with employment lands that are not considered part of the short term supply.

OAR 660-009-0025(8) Uses with Special Siting Characteristics

“Cities and counties that adopt objectives or policies providing for uses with special site needs must adopt policies and land use regulations providing for those special site needs. Special site needs include, but are not limited to large acreage sites, special site configurations, direct access to transportation facilities, prime industrial lands, sensitivity to adjacent land uses, or coastal shoreland sites designated as suited for water-dependent use under Goal 17. Policies and land use regulations for these uses must:

- (a) Identify sites suitable for the proposed use;*
- (b) Protect sites suitable for the proposed use by limiting land divisions and permissible uses and activities that interfere with development of the site for the intended use; and*
- (c) Where necessary, protect a site for the intended use by including measures that either prevent or appropriately restrict incompatible uses on adjacent and nearby lands.*

OAR 660-024-0050(6) Plan designations and zoning

“When land is added to the UGB, the local government must assign appropriate urban plan designations to the added land, consistent with the need determination. The local government must also apply appropriate zoning to the added land consistent with the

¹⁰¹ As cited on page 112-113 of this report, Exhibit E, SDC 3.2-915, Table A.

plan designation or may maintain the land as urbanizable land until the land is rezoned for the planned urban uses, either by retaining the zoning that was assigned prior to inclusion in the boundary or by applying other interim zoning that maintains the land's potential for planned urban development. The requirements of ORS 197.296 regarding planning and zoning also apply when local governments specified in that statute add land to the UGB."

Special site needs and characteristics. The City's CIBL/EOA identifies a need for suitable employment land to accommodate uses with "special siting characteristics,"¹⁰² thus OAR 660-009-0025(8) is applicable.

The City's CIBL/EOA identifies a need for suitable employment land to accommodate uses with special site needs identified in OAR 660-009-0025(8) including but not limited to:

- large acreage sites
- special site configurations
- direct access to transportation facilities
- prime industrial lands
- sensitivity to adjacent land uses

The Administrative Rule defines site characteristics as follows in OAR 660-009-0005(11):

"Site Characteristics" means the attributes of a site necessary for a particular industrial or other employment use to operate. Site characteristics include, but are not limited to, a minimum acreage or site configuration including shape and topography, visibility, specific types or levels of public facilities, services or energy infrastructure, or proximity to a particular transportation or freight facility such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes."

Minimum acreage/Large acreage sites. The City's CIBL inventory of Industrial and Other Employment Lands indicates that Springfield has a deficit of suitable sites that are 20 acres and larger, and deficit of sites 5-20 acres in size. After assuming that all site needs for commercial and industrial uses that require sites smaller than 5 acres would be addressed through redevelopment¹⁰³, CIBL/EOA Table 5-4, (p. 80) shows a deficit of 2 industrial sites and 1 commercial and mixed use site 20 acres and larger. Table 5-2 (p. 78) shows the average site size in Springfield for industrial and commercial and mixed use sites 20 acres and larger: 63 acres and 60 acres respectively. Thus Springfield has a need for 126 acres of

¹⁰² CIBL/EOA pp. 82-98 identifies target large-scale manufacturers and large office employers that require sites with special characteristics including : site size 20 acres and larger, topography less 5 % / 7%, transportation access as close to I-5 as possible via unimpeded freight route, access to public facilities and services, and sites with two or fewer owners.

¹⁰³ CIBL/EOA Table 5-1, p. 78 shows that 188 industrial sites and 340 commercial and mixed use sites would redevelop to address land needs over the 20-year period. In addition to this assumption, Springfield concludes that all land needs on sites smaller than 5 acres would be accommodated through redevelopment, including the 6-acre deficit of 2-5 acre sites shown in Table 5-3, p. 79.

industrial employment land on 2 sites larger than 20 acres and a need for 97 acres of commercial employment land on 5 sites, including one site that is 60 acres in size.

The CIBL/EOA presents the range of typical site size attributes of Springfield's target employers in the manufacturing category on p. 84-90 and in the large office category on p. 90-95.

Identification of large acreage sites suitable for the proposed use. The City and Lane County amended the Springfield UGB to provide at least 223 suitable acres of employment land to meet the City's employment land needs for suitable sites larger than 5 acres. OAR 660-009-0025(8) requires the City to identify the lands to accommodate the proposed uses. The sites are identified in Ordinance Exhibit A-2 as "North Gateway" site and "Mill Race" site and are described in Ordinance Exhibit C-1 Urbanization Element and Exhibit D Metro Plan text amendment" Urban Holding Area – Employment Plan Designation.

Protection of sites suitable for the proposed use. OAR 660-009-0025(8) requires the City to adopt land use regulations limiting land divisions and permissible uses and activities that interfere with development of the site for the intended use, and *"where necessary, protect a site for the intended use by including measures that either prevent or appropriately restrict incompatible uses on adjacent and nearby lands."* The City and Lane County adopted Ordinance Exhibit E amending the Springfield Development Code to establish SDC 3.2-900: the "Agriculture – Urban Holding Area (AG)" land use zoning district; and Exhibit A-3 applying the AG zone to the Urban Holding Area - Employment sites.

The AG District implements the Urban Holding Area-Employment (UHA-E) plan designation and Springfield Comprehensive Plan Urbanization Element policies by preserving an inventory of suitable employment sites — including sites 20 acres and larger — to provide opportunities for economic growth and diversification. The AG District is applied concurrently with the UHA-E designation at the time of the subject Springfield Urban Growth Boundary (UGB) amendment and remains in effect until the land is designated and zoned for urban employment uses through a City or owner-initiated plan or zoning amendment process, as described in Subsection 3.2-930 Planning Requirements Applicable to Zoning Map Amendments, and as further described in the Springfield Comprehensive Plan Urbanization Element.

The AG District protects urbanizable lands designated UHA-E in the comprehensive plan from land division and incompatible interim development. The AG regulatory measures guide and support orderly and efficient transition from rural to urban land use to accommodate population and urban employment inside the UGB. AG standards regulate development to maintain the land's potential for planned future urban development until appropriate urban facilities and services are planned or available and annexation to Springfield can occur, as described in the Springfield Comprehensive Plan Urbanization Element. Land designated Urban Holding Area-Employment will be annexed to the city and rezoned from AG to an appropriate industrial or commercial zone at which time urban industrial and other employment uses will supersede the interim rural uses permitted in the AG District.

Special site configuration including shape and topography. The CIBL/EOA presents the typical site configuration and topography attributes of Springfield’s target employers in the manufacturing category and in the large office category.

The employment site needs analysis in CIBL/EOA Chapter 4 identified site needs in five types of buildings: warehousing and distribution, general industrial, office, retail, and other services. The characteristics of needed sites for each of these building types are described in CIBL/EOA Chapter 5. All sites will need access to electricity, phone, and high-speed telecommunications.

OAR 660-009-0005(11) defines “minimum acreage or site configuration” as an attribute of a site that may be necessary for a particular industrial or other employment use to operate.

Springfield’s analysis identified a need for sites larger than 5 acres and sites larger than 20 acres. Table 5-1 shows that Springfield has a deficit of two Industrial sites 20 acres and larger, which may be needed by target industries such as light manufacturing, high-tech manufacturing, recreation equipment manufacturing, wood products manufacturing, medical products manufacturing, alternative energy manufacturing, or specialty food processing.

Springfield also has a deficit of Commercial and Mixed Use sites, including: four sites 5 to 20 acres in size and one site 20 acres and larger. The target industries that may locate on these sites include: Medical Services, Professional and Technical Services, Back-Office Functions, Call Centers, or Corporate Headquarters.

CIBL/EOA pages 82-98 present the characteristics of needed sites, focusing on the deficit of 223 acres of employment land identified in Table 5-4¹⁰⁴:

Table 5-4. Employment site and land needs, Springfield UGB, 2010-2030

	Site Size (acres)			Total
	Less than 5	5 to 20	20 and Larger	
Industrial				
Sites needed	none	none	2	2
Land need (acres)	none	none	126	126
Commercial and Mixed Use				
Sites needed	none	4	1	5
Land need (acres)	none	37	60	97
Total sites needed	none	4	3	7
Total acres needed	none	37	186	223

Source: ECONorthwest

OAR 660-009-0005(11) defines “shape and topography” as attributes of a site that may be necessary for a particular industrial or other employment use to operate.

¹⁰⁴ CIBL/EOA, p. 80

OAR 660-009-0005(11) defines “visibility” as an attribute of a site that may be necessary for a particular industrial or other employment use to operate. The City’s UGB expansion includes land visible from Interstate Highway 5.

OAR 660-009-0005(11) defines “specific types or levels of public facilities, services or infrastructure” as attributes of a site that may be necessary for a particular industrial or other employment use to operate. The City expanded the UGB to include land that can be served with urban levels of public facilities, services or infrastructure.¹⁰⁵

OAR 660-009-0005(11) defines “proximity to a particular transportation or freight facility such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes” as attributes of a site that may be necessary for a particular industrial or other employment use to operate. The City expanded the UGB to include land that is located proximate to major transportation routes. The North Gateway site is within 1 mile of Interstate Highway 5. The Mill Race site is within ½ mile of Oregon Highway 126, and accessible to truck routes.

The OAR 660-009-0005(11) definition of “site characteristics” states that the characteristics listed in the definition “include, but are not limited to” the characteristics listed in the definition, thus other characteristics — such as proximity to existing or planned public transit routes may be necessary siting criteria for major employers and may be necessary to achieve local and regional transportation, land use, and equity policy objectives.

The City’s identification of needed site characteristics is reasonable, explained by evidence in the CIBL/EOA and evidence in the record, and consistent with the Goal 9 administrative rule.

CIBL/EOA presents information about the sites needed by the target industries based on information by Business Oregon, economic development efforts in Springfield, a study about industry site needs in Springfield by Tadzo, and other sources. Appendix C (Tables C-6 to C-11) present details of research about site needs of Springfield’s target industries from these sources. CIBL/EOA Table 5-5¹⁰⁶ provides a summary of site characteristics of sites needed by Springfield’s target industries:

¹⁰⁵ See City’s complete findings under Goal 14 Public Facilities Analysis

¹⁰⁶ ECONorthwest, CIBL/EOA, page 84

Table 5-5. Summary of characteristics of sites needed by target industries, Springfield

Type of site and target industries	Site Size	Topography	Transportation Access	Access to City Services
<p>Target Industries: Medical Equipment High-tech Electronics and Manufacturing Recreational Equipment Furniture Manufacturing Specialty Food Processing Building Type: General Industrial Site Needs for: Manufacturing</p>	<p>Manufacturers similar to the target industries that needed sites larger than 5 acres who considered locating in Oregon or in the Eugene-Springfield area needed sites ranging in size from 10 acres to more than 100 acres. The size of sites needed by Springfield's target industries will vary by the size of building: 100,000 sq ft building will need a site of between 9-12 acres 200,000 sq ft building will need a site of between 18-24 acres 500,000 sq ft building will need a site of between 45- 60 acres The average size of existing sites with employment in Springfield (Table 5-2) is: 5-20 acre site: 10 acres 20+ acre site: 63 acres</p>	<p>The slope for manufacturing sites should be 5% or less. High-tech and Campus manufacturing can have a slope of 7% or less.</p>	<p>At the furthest, sites should be located within 15 miles or less of I-5 or a principal arterial road that is designated as a freight route. Most businesses in Springfield typically locate within one-mile of I-5 or within about one-half a mile of a state highway.</p>	<p>Access to Springfield's municipal water and wastewater system, with a minimum pipeline size of 8 to 10 inches (varies by target industry).</p>
<p>Target Industries: High Tech Services Corporate Headquarters Biotech Professional and Technical Services Back office Medical Services Building Type: Commercial and Other Site Needs for: Large Office Employers</p>	<p>Commercial office employers that needed sites larger than 5 acres who considered locating in Oregon needed sites ranging in size from 10 acres to 100 acres. The size of sites needed by Springfield's target industries will vary by the size of building: 50,000 sq ft building will need a site of between 4- 6 acres 100,000 sq ft building will need a site of between 8-12 acres 200,000 sq ft building will need a site of between 16-24 acres If a business park is developed to meet the site needs of these businesses, typical business park sizes in the Portland region are between about 30 and 75 acres. The average size of existing sites with employment in Springfield (Table 5-2) is: 5-20 acre site: 9.3 acres 20+ acre site: 60 acres</p>	<p>The slope for manufacturing sites should be 5% or less. High-tech and Campus manufacturing can have a slope of 7% or less.</p>	<p>At the furthest, sites should be located within 15 miles or less of I-5 or a principal arterial road. Most businesses in Springfield typically locate within one-mile of I-5 or within about one-half a mile of a state highway. Sites should have access to mass transit within one-half mile.</p>	<p>Access to Springfield's municipal water and wastewater system, with a minimum pipeline size of 8 to 10 inches (varies by target industry).</p>

ECONorthwest, CIBL/EOA Table 5-5

Site needs to accommodate target manufacturing uses requiring sites 5 acres and larger are explained in CIBL/EOA pp. 85-90.

Site needs to accommodate target large office employers uses requiring sites 5 acres and larger are explained in CIBL/EOA pp. 90-95. The City developed site characteristics (site size, topography, transportation access, access to services and land ownership) that are typical of and have a meaningful connection to the operation of the industrial or employment use as required by law. For example, in terms of the site size characteristic, both manufacturing and large office employers require a site large enough to accommodate the built space (and phased development manufacturing uses), the right of way requirements to accommodate the capacity for needed infrastructure, and the space required to meet the applicable land use or natural resource buffers required through the City's development or building code regulations. The data from Business Oregon and the Tadzo report also shows that manufacturing and large employer uses are currently located on sites 10 acres or larger.

For topography it was determined that manufacturing uses require and are generally located on flat sites where as large office employers can and are located on sites with low to moderate slope. Manufacturing and large office employers are generally located on arterial or major collector streets instead of smaller local streets to ensure sufficient automotive and transit access. Access to services is required and typical of these types of employers in order to be cost effective and to allow

manufacturing industries access to services such as water and wastewater. The land ownership site characteristic is connected to the operation of manufacturing and large office employers because the extra time and cost of developing an industrial site with multiple landowners can often make a development infeasible. Also, OAR 660-009-0005(2) specifically lists parcel fragmentation as a development constraint.

The City and Lane County adopted policies in the 2030 Comprehensive Plan Urbanization Element and land use regulations in the Springfield Development Code¹⁰⁷ to protect sites 20 acres and larger from land division in order to accommodate uses that require sites 20 acres and larger.

Metro Plan IV-4, Policy 11 states:

“Local implementing ordinances shall provide a process for zoning lands in conformance with the *Metro Plan*.”

The 2030 Plan includes amendments to the Metro Plan Diagram and text, Springfield Zoning Map and Springfield Development Code to establish areas of the City where employment land uses can occur to provide sites of suitable sizes, types and locations within proposed North Gateway and Mill Race UGB expansion areas.

The 2030 Plan relies on existing acknowledged Metro Plan designations and Springfield Development Code zoning districts to identify areas of the City where employment land uses are permitted to provide sites of suitable sizes, types and locations within the existing UGB.

The 2030 Plan Ordinance Exhibit D amends the Metro Plan to establish the Urban Holding Area – Employment (UHA-E) Metro Plan designation, described in the amended Metro Plan text page II-G-8 as follows:

Urban Holding Area – Employment

Lands brought into Springfield’s UGB to address 2010-2030 land needs for large employment sites are designated Urban Holding Area – Employment (UHA-E) as an interim designation to maintain the land’s potential for planned urban development until appropriate urban facilities and services are planned or available and annexation to Springfield can occur. Lands within the UHA-E designation are zoned Agriculture to retain large parcel sizes and current predominant farm use. The UHA-E designation remains in effect until the appropriate Employment designation is adopted through a City refinement plan process or owner-initiated plan amendment process, and when land is master planned, annexed and zoned to allow site development with employment uses. A 50-acre minimum lot size is applied to ownerships of 50 or more acres and a 20-acre minimum lot size is applied to ownerships of 20 to 50 acres to protect undeveloped sites from piecemeal development until a site development plan has been approved.

¹⁰⁷ See Ordinance , Exhibit E: SDC 3.2-900 Agriculture- Urban Holding Area (AG) Zoning District

The proposal amends the Metro Plan to adopt the 2030 Urbanization Element. 2030 Urbanization Element policies establish special planning requirements applicable to land designated UHA-E, including policies #5-12 to retain large parcels to meet specific employment land needs. A 50-acre minimum lot size for land division is applied to tax lots or ownerships greater than 50 acres. A 20-acre minimum is applied to tax lots or ownerships less than 50 acres.

Adoption of Ordinance Exhibit E amends the Springfield Development Code to establish the Agriculture – Urban Holding Area (AG) Zoning District to implement the UHA-E plan designation and 2030 Urbanization Element policies. AG is a holding zone that restricts divisions and interim land uses that could impede development of the site to meet the specific employment land needs identified in the City’s EOA. The primary purpose of SDC Section 3.2-900 AG Zoning District is to protect large tracts of suitable employment land within the Springfield UGB to meet Springfield’s long term employment land needs for the 2010-2030 planning period. Springfield applies the AG interim zoning to lands added to the UGB in 2016 to implement 2030 Comprehensive Plan Urbanization Element policies, the Urban Holding Area-Employment (UHA-E) Metro plan designation and the Natural Resource (NR) Metro plan designation. The AG zone allows continuation of agricultural and existing lawful uses while reserving suitable land for siting future employment uses that require large sites. The AG zone development standards serve to maintain the land’s potential for planned urban development by regulating land division and interim uses that would impede development of urban employment uses in the future.

The AG zone purpose statement:

The City’s Agriculture—Urban Holding Area District (AG) is established to protect urbanizable lands designated Urban Holding Area-Employment (UHA-E) and Natural Resource (NR) in the comprehensive plan from land division and incompatible interim development. The AG regulatory measures guide and support orderly and efficient transition from rural to urban land use to accommodate population and urban employment inside the UGB. AG standards regulate development to maintain the land’s potential for planned future urban development until appropriate urban facilities and services are planned or available and annexation to Springfield can occur, as described in the Springfield Comprehensive Plan Urbanization Element. Land designated Urban Holding Area-Employment will be annexed to the city and rezoned from AG to an appropriate industrial or commercial zone at which time urban industrial and other employment uses will supersede the interim rural uses permitted in the AG District.

The AG District 3.2-915 allows the following uses:

Use Categories/Uses	AG
A. Allowed Interim Uses for Lands Designated Urban Holding Area- Employment	
<u>Agricultural uses including the cultivation of tree crops, plants, orchards, pasture, flower, berry and bush crops or the keeping, boarding, raising or breeding of livestock or poultry.</u>	P
<u>On-site constructing and maintaining of equipment, structures and facilities used for the activities described as farm uses. (1),(3),(4)</u>	P
<u>Preparation, storage, and marketing of the products or by-products raised on such land for human and animal use, or distributing food by donation to a local food bank or school or otherwise. (1)</u>	P

Use Categories/Uses	AG
Sales/Display of Produce as specified in Subsection 4.8-125. (1),(4)	S
Signs (5)	P
Accessory Uses	
Community Gardens	P
Replacement of a lawfully existing dwelling or structure as specified in Subsection 5.8-115. (2),(3)	P
Emergency Medical Hardship as specified in Section 5.10-100. (2)	P
Other Commercial Services	
Home Occupation within a lawfully existing dwelling and as specified in Subsection 4.7-165 (4)	S
Utilities and Communication	
High Impact Public Utility Facility as specified in Subsection 4.7-160	S/D
Low Impact Public Utility Facility	P

- (1)** Where farm stands are designed and used for sale of farm crops and livestock grown on the farm operation and does not include structures for banquets, public gatherings or public entertainment. "Farm crops and livestock" includes both fresh or processed farm crops and livestock grown on the farm operation.
- (2)** On parcels larger than 20 acres, replacement of a lawfully existing farm dwelling as specified in Subsection 5.8-115 shall be placed at the existing dwelling location; or at least 100 feet from the adjoining lines of property zoned EFU to minimize adverse effects on nearby farm lands outside the UGB; and in a location that does not impede future development of urban employment use or extension of urban infrastructure as shown in transportation plans, public facilities plans or master plans.
- (3)** Placement of new structures is subject to Water Quality Protection setbacks as specified in Subsection 4.3-115 and the Natural Resource Protection standards as specified in Subsection 4.3-117 where applicable.
- (4)** Proposed new uses or expansions of existing uses must demonstrate that the use will not generate vehicle trips exceeding pre-development levels.
- (5)** Signs shall not extend over a public right of way or project beyond the property line; shall not be illuminated or capable of movement; and shall be limited to 200 square feet in area.

The AG zone also implements the Natural Resource designation on the North Gateway sites as follows:

Commentary. The list of allowed activities for lands designated Natural Resource is derived from the existing Natural Resource Protection Areas standards in SDC 4.3-117.	
B. Allowed Interim Uses for Lands Designated Natural Resource (6),(7)	
Continuation of normal farm practices such as grazing, plowing, planting, cultivating and harvesting. (6)	P
Wetland and/or riparian restoration and rehabilitation activities	P
Vegetation management necessary to control invasive vegetation or to reduce a hazard to life or property.	P
Removal of non-native vegetation, if replaced with native plant species at a density that prevents soil erosion and encourages the future dominance of the native vegetation.	P
Maintenance of existing drainage ways, ditches, or other structures to maintain flows at original design capacity and mitigate upstream flooding, provided that management practices avoid sedimentation and impact to native vegetation and any spoils are be placed in uplands.	P
Waterway restoration and rehabilitation activities such as channel widening, realignment to add meanders, bank grading, terracing, reconstruction of street crossings, or water flow improvements.	P
Emergency stream bank stabilization to remedy immediate threats to life or property. (7)	P
Bioswales or similar water quality improvement projects;	P

<u>Public multi-use paths, access ways, trails, picnic areas, or interpretive and educational displays and overlooks, including benches and outdoor furniture.</u>	P
<u>Utilities and Communication</u>	
<u>High Impact Public Utility Facility as specified in Subsection 4.7-160</u>	S/D
<u>Low Impact Public Utility Facility</u>	D
(6) <u>Consistent with applicable wetland or land use permits issued by Federal, State or local approving authority with jurisdiction over wetland or riparian resources, including the Water Quality Protection provisions in Subsection 4.3-115 and Section 3.3-400 Floodplain Overlay District.</u>	
(7) <u>Federal, State or local emergency authorization may be needed for in-stream work.</u>	

AG zone 3.2-920 addresses pre-existing and non-conforming uses as follows:

3.2-920 Pre-existing and Non-conforming Uses

- A.** Continuance, expansion, modification or replacement of lawful uses existing on a property at the time of the effective date of this zone are determined and permitted as otherwise specified in Section 5.8-100 of this Code; and

- B.** The Applicant shall submit evidence to demonstrate that the expansion or modification:
 - 1.** will not generate vehicle trips exceeding pre-development levels;
 - 2.** will not force a significant change in accepted farm practices on surrounding lands devoted to farm or forest use; and
 - 3.** will not significantly increase the cost of accepted farm or forest practices on surrounding lands devoted to farm or forest use.

AG zone 3.2-925 addresses placement of interim uses on a site so as not to impede eventual urban development and extension of infrastructure:

3.2-925 Standards for Interim Development

These regulations apply to the development of interim uses as specified in Subsection 3.2-915 and 3.2-920 in the AG District.

- A.** Receive certification from the Lane County Sanitarian that any proposed wastewater disposal system meets Oregon Department of Environmental Quality (D.E.Q.) standards prior to Development Approval.

- B.** Interim uses may not be placed on a site in manner that would future development of land designated Urban Holding Area-Employment with urban employment uses.

- C.** Interim uses may not be placed on a site in manner that would impede extension of infrastructure to serve land designated Urban Holding Area-Employment from developing with urban employment uses.

D. To demonstrate compliance with this provision, and in addition to the special provisions listed in Table A, the Applicant shall submit a Future Development Plan that:

1. Includes a brief narrative explaining the existing and proposed use of the property;
2. Indicates the proposed development footprint on a scaled plot plan of the property;
3. Limits the proposed new development footprint to ½ acre or less of the site;
4. Addresses future street connectivity as shown in the Transportation System Plan, Regional Transportation System Plan, Local Street Network Plan, Springfield Comprehensive Plan, applicable Refinement Plans and this Code;
5. Addresses the number and type of vehicle trips to be generated by the proposed use;
6. Addresses the applicable Natural Resources protection, Water Quality Limited Watercourses protection, Floodplain Overlay Development Standards, and Drinking Water Protection Overlay Development Standards of this Code.

AG zone 3.2-925 E. regulates land division and interim development through the following land use regulations:

<u>Minimum Lot/Parcel Sizes</u>	<u>A 50-acre minimum lot/parcel size is applied to lots/parcels 50 acres or larger. A 20-acre minimum lot/parcel size is applied to lots/parcels less than 50 acres in size. Lots/parcels less than 20 acres in size may not be further divided. (1)</u>
<u>Main Building Height</u>	<u>35 feet</u>
<u>Accessory Building Height</u>	<u>35 feet (2)</u>
<u>Building/structure Setbacks: UHA-E designated parcels 20 acres and larger</u>	<u>20 feet from State, County, City roads, streets and local access roads. At least 100 feet from the adjoining lines of property zoned EFU; and in a location that does not impede future development of urban employment use or extension of urban infrastructure as shown in transportation plans, public facilities plans or master plans.</u>
<u>Building/structure Setbacks: UHA-E designated parcels smaller than 20 acres</u>	<u>20 feet from State, County, City roads, streets and local access roads. 10 feet from other property lines.</u>
<u>Minimum Lot/Parcel Frontage</u>	<u>None</u>
<u>Minimum Lot/Parcel Depth</u>	<u>None</u>

(1) Exemption: Land divisions that create lots/parcels for the purpose of establishing a Natural Resource or Public/Semi-Public Parks and Open Space designation within the floodway, wetland or riparian resource portions of the site may create lots/parcels less than 20 acres within the Natural Resource or Public/Semi-Public Parks and Open Space designation portion of the parent lot/parcel.

(2) Water tanks, silos, granaries, barns and similar accessory structures or necessary mechanical appurtenances may exceed the minimum height standard.

It should be noted that the AG zone, when acknowledged, will be in effect for land currently zoned Exclusive Farm Use (EFU) by Lane County. The property subject to the AG zone is currently zoned EFU 30 and EFU 25 by Lane County, and subject to 30-acre and 25-acre minimum parcel sizes. The AG zone retains a restriction on land division to preserve large employment sites pursuant to the City’s Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis and 2030 Comprehensive Plan Economic Element policies.

The existing Lane County EFU Zone setback standards found in Lane County Chapter 16.212 (10)(a)(ii) require dwellings to be sited at least 100 feet from the adjoining lines of property zoned EFU “to minimize impacts upon nearby farm uses or to assure optimal siting of proposed dwellings to minimize adverse impacts on nearby farm and forest lands.” The setback standards found in Lane County Chapter 16.212 (10)(b) require 20 foot setbacks from the right of way of a State or County road or a local access public road and 10 foot setbacks from other property lines. Larger setbacks are established for riparian corridors. Other similar codes to the AG zone — such as the City of Redmond for Urban Holding-10 acre zone — require 50-foot front and rear yard setbacks and 10-foot side yard setbacks, and establish a maximum building height of 30 feet.

The City’s proposed development standards for the AG zone are reasonable and provide the level of site protection required under OAR 660-009-0025(8).

Planning procedures required prior to rezoning land from Agriculture - Urban Holding Area (AG) to urban employment zoning designations. In addition to the standards, procedures and review criteria in Section 5.22-100 applicable to Zoning Map Amendments, AG zone 3.2-930 Table 1 provides an overview of the planning procedures required prior to rezoning land from Agriculture - Urban Holding Area (AG) to urban employment zoning designations (e.g. Employment, Employment Mixed Use, Campus Industrial, or Industrial). Table 1 shows both City and Owner-initiated planning processes.

3.2-930 Planning Requirements Applicable to Zoning Map Amendments

In addition to the standards, procedures and review criteria in Section 5.22-100 applicable to Zoning Map Amendments, Table 1 provides an overview of the planning procedures required prior to rezoning land from Agriculture - Urban Holding Area (AG) to urban employment zoning designations (e.g. Employment, Employment Mixed Use, Campus Industrial, or Industrial). Table 1 shows both City and Owner-initiated planning processes.

<u>Table 1. Pre-Development Approval Process Steps – Urban Holding Areas</u>	
<u>City-initiated Planning Process</u>	<u>Owner-initiated Planning Process</u>
<u>1. City prepares Plan Amendment to address all applicable Statewide Planning Goals (e.g. amended or new refinement plan or district plan), Metro Plan and Springfield Comprehensive Plan policies and Springfield Development Code</u>	<u>1. Applicant submits request to City to initiate amendments to the Transportation System Plan and Public Facilities and Services Plan, and other city actions that may be required prior to plan amendment approval.</u>

<u>standards.</u>	
<u>2. City and Lane County approve Plan Amendment to amend Metro Plan and Springfield Comprehensive Plan. UHA-E designation is replaced with employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, or Industrial). AG zoning remains in effect until Master Plan and new zoning are approved.</u>	<u>2. Applicant prepares and submits Plan Amendment application to address all applicable Statewide Planning Goals, Metro Plan and Springfield Comprehensive Plan policies, and Springfield Development Code standards. Applicant proposes employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, or Industrial).</u>
<u>3. City prepares and approves Zoning Map Amendment to apply new zoning districts (e.g. Industrial, Campus Industrial, Employment Mixed Use, or Employment). Land is planned and zoned and eligible for annexation.</u>	<u>3. City and Lane County approve Plan Amendment to amend Metro Plan and Springfield Comprehensive Plan. UHA-E designation is replaced with employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, or Industrial). AG zoning remains in effect until Master Plan and new zoning are approved.</u>
<u>4. Applicant prepares and submits Preliminary Master Plan and annexation applications with demonstration of key urban service provision.</u>	<u>4. Applicant prepares and submits Preliminary Master Plan, proposed zoning and demonstration of key urban services provision. Applicant submits annexation application.</u>
<u>5. City approves Master Plan and annexation.</u>	<u>5. City approves Master Plan and Zoning Map Amendment and annexation.</u>
<u>6. Applicant submits Site Plan, Subdivision and other applicable development applications.</u>	<u>6. Applicant submits Site Plan, Subdivision etc. development applications.</u>

Conclusion OAR 660-009-0025(8): The City applied the “Urban Holding Area – Employment (UHA-E)” Metro Plan designation and Agriculture – Urban Holding Area (AG) Zoning District to the newly urbanizable lands it added to the UGB. Acting together, the designations serve as an interim “holding zone” to ensure that lands added to the UGB to meet specific large site employment land needs are reserved to meet those needs. The City’s UHA-E designation and AG zone land use regulations ensure that lands added to the UGB to meet specific employment land needs identified in the City’s CIBL/EOA are reserved, planned, zoned and prepared for development to meet those needs, as described in 2030 Urbanization Element policies.

OAR 660-009-0030 Multi-Jurisdiction Coordination

“(1) Cities and counties are strongly encouraged to coordinate when implementing OAR 660-009-0015 to 660-009-0025.”

While Springfield and Eugene are no longer sharing a UGB, and have chosen to prepare and develop city-specific economic opportunities analyses, and economic development policies — the cities and Lane

County continue to partner and coordinate through regional economic development planning activities. Regional economic development initiatives are directly reflected in the Springfield 2030 Economic Element.

Goal EG-2 states:

“Support attainment of the Regional Prosperity Economic Development Plan¹⁰⁸ goals for creating new metropolitan area jobs in the chosen economic opportunity areas, increasing the average annual wage and reducing unemployment.”

Goal EG-5 states:

“Support the development of emerging economies guided by the following principles:¹⁰⁹

- a. Healthy Living—Champion businesses and entrepreneurs that promote a healthy, safe, and clean community while enhancing, protecting, and making wise use of natural resources.***
- b. Ideas to Enterprise—Encourage a culture of entrepreneurship and re-investment into the local community.***
- c. Regional Identity—Create a strong economic personality that celebrates our region’s attributes and values.***
- d. Be Prepared—Contribute to development of the region’s physical, social, educational, and workforce infrastructure to meet the needs of tomorrow.***
- e. Local Resilience— Support businesses and entrepreneurs that lead the city and region to greater economic independence, innovation, and growth of the traded sector economies.”***

Conclusion OAR 660-009-0030: Springfield, Eugene and Lane County have coordinated throughout the Metro Plan transition process and 2030 planning process, sharing information and collaborating to develop direction for the “future” Metro Plan to support respective comprehensive plans within the Eugene-Springfield Metro region.

Goal 9 Conclusion: For the reasons stated above and based on information found in the Springfield CIBL/EOA, the proposed Comprehensive Plan amendments comply with Goal 9.

¹⁰⁸ *Regional Prosperity Economic Development Plan* — approved by the Springfield, Eugene and Lane County Joint Elected Officials (JEO) in February 2010

¹⁰⁹ *ibid.*

V. Statewide Planning Goal 14: Urbanization Employment Land Need and Response to Deficiency

ORAR 660-015-0000(14)

To provide for an orderly and efficient transition from rural to urban land use, to accommodate urban population and urban employment inside urban growth boundaries, to ensure efficient use of land, and to provide for livable communities.

ORAR 660-015-0000(14), ORAR 660-024-0040(1), ORAR 660-024-0040(5), ORAR 660-024-0050(1), and ORAR 660-024-0050 (4)

The standards for amending an urban growth boundary (UGB) are found in Statewide Planning Goal 14 (Urbanization), and in ORS 197.298 Priorities for urban growth boundary amendments. The Goal 14 rule (ORAR Chapter 660, Division 024) interprets and clarifies the more general language of Goal 14 and explains the relationship between statutory “priorities” and Goal 14 “location factors.” In the Goal 14 rule findings below, *text shown in italic is quoted directly from the referenced goal, rule or statute.*

Goal 14 describes how land needs — including employment land needs — shall form the basis for changes to UGBs: *“Land Need. Establishment and change of urban growth boundaries shall be based on the following:*

(1) Demonstrated need to accommodate long range urban population, consistent with a 20-year affected local governments; and

(2) Demonstrated need for housing, employment opportunities, livability or uses such as public facilities, streets and roads, schools, parks or open space, or any combination of the need categories in this subsection (2).

In determining need, local government may specify characteristics, such as parcel size, topography or proximity, necessary for land to be suitable for an identified need.

Prior to expanding an urban growth boundary, local governments shall demonstrate that needs cannot reasonably be accommodated on land already inside the urban growth boundary.” [ORAR 660-015-0000(14)]

Relationship between Goal 9 and Goal 14

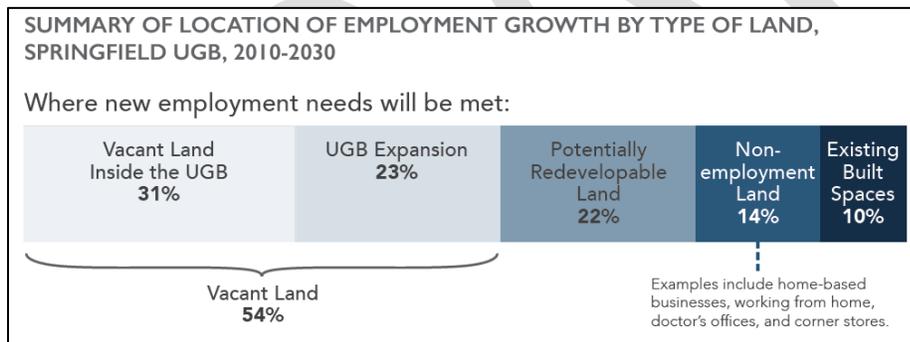
The City is expanding the UGB to provide land to meet specific employment land needs, thus the City’s findings must demonstrate how the City’s analyses of land need and boundary location alternatives properly addressed the relationship between Goals 9 and 14 and balanced compliance with both planning goals. The City does this by demonstrating how the factors in its decisions about land need under Goal 9 and the proposed UGB boundary location were balanced consistent with Goal 14: Urbanization — *“to provide for an orderly and efficient transition from rural to urban land use, to*

accommodate urban population and urban employment inside urban growth boundaries, to ensure efficient use of land, and to provide for livable communities.”

The City’s findings under Goals 11, 12 and OAR 660-024-0060 explain how, in its response to meeting the City’s employment land deficit under Goal 9, the City carefully considered coordination of land use, transportation and public facilities planning [OAR 660-024-0040(7)], based on substantial evidence, to inform its policy choices.

Goal 14 allows cities to specify characteristics necessary for land to be suitable for identified need. As explained and referenced in the City’s findings under Goal 9, the Springfield CIBL/EOA identifies specific parcel size, topographical and proximity characteristics necessary to meet the operational requirements for targeted employment types, including businesses and industries that require industrial and commercial mixed-use sites larger than 5 acres.

Goal 14 requires the City to seek to accommodate the identified 20-year land needs on land already inside the urban growth boundary before expanding the UGB [OAR 660-015-0000(14)]. The City must explain and provide substantial evidence as required by Goal 9 to demonstrate that the existing land supply cannot reasonably provide suitable sites to accommodate the economic opportunities identified in the CIBL/EOA. The City’s 2030 comprehensive plan policies, plan designations and implementation measures provide employment sites within the existing UGB to accommodate 77% of Springfield’s forecast employment.¹¹⁰



The 2030 Plan and UGB amendment provide land to meet long-term employment land site needs that cannot reasonably be accommodated on land already inside the urban growth boundary. The City’s 2030 comprehensive plan policies, plan designations and implementation measures provide a 20-year supply of employment land on sites within two UGB expansion areas: the North Gateway and Mill Race sites (23% of forecast employment). The UGB expansion provides land to accommodate industrial and commercial mixed-use target industries’ site needs on sites larger than 5 acres, including 2 large industrial employment sites on 126 acres and 5 large commercial mixed-use employment sites on 97 acres. The City designated the suitable, unconstrained lands it added to the UGB “Urban Holding Area –

¹¹⁰ CIBL/EOA, Appendix C Employment Forecast and Site Needs for Industrial and Other Employment Uses, pp. 153-160.

Employment (UHA-E)” to provide a 20-year supply of employment land to accommodate the need for large sites.

The 2030 Plan Economic and Urbanization Element policies identify these specific employment site needs and establish special planning requirements and zoning regulations to reserve the sites added to the UGB for the intended large site employment purposes. The proposed Metro Plan diagram plan amendment applies the Urban Holding Area - Employment (UHA-E) plan designation. The proposed Zoning Map amendment applies Agriculture—Urban Holding Area (AG) urban transition zoning to protect the large employment sites from land divisions and incompatible interim development. Together, these actions plan and zone lands added to the UGB for employment to establish minimum parcel sizes, topographical (flat topography) and proximity characteristics necessary to meet the operational requirements for targeted employment types.

The City’s CIBL/EOA provides substantial evidence to support the City’s policy choice under Goals 9 and 14 — expanding the UGB to add large sites to support economic opportunities and diversification of the economy. As stated in the CIBL/EOA pages 95-97:

- *“Economic growth. Decision makers and community members that participated in the economic opportunities analysis agreed that economic growth is desirable over the planning period. The employment forecast indicates Springfield will add 13,440 new employees between 2010 and 2030 using the OAR 660-024-0040(8)(a)(ii) methodology. The economic opportunities analysis assumes that Springfield will have employment growth in a wide variety of businesses, from services and retail for residents to industrial development to medical services. The City wants to diversify its economy and attract higher wage and professional jobs.” (emphasis added)*
- *“Buildable lands. Springfield has 3,414 acres that are designated for industrial and other employment use. About two-thirds of the land designated for employment within Springfield’s UGB is considered developed and is not expected to redevelop over the 20 year planning period. Less than 15% of this land is buildable, unconstrained land. The majority of buildable, unconstrained employment land in Springfield has existing development on it that is expected to redevelop over the planning period. Springfield has a lack of buildable large sites, with one buildable site 20 acres and larger and 22 buildable sites in the five to 20 acre size range.” (emphasis added)*
- *Availability of sites 20 acres and larger is important for attracting or growing large businesses, which are often traded-sector businesses. If the City does not have these large sites, there is little chance that the City will attract these types of businesses. While it may not be clear exactly what the business opportunities may be in ten to twenty years, it is clear that these businesses will not locate in Springfield if land is not available for development.” (emphasis added)*
- *“For example, in the past twenty years, most of the Gateway area developed. The area has a mix of uses including the International Way campus employment district, regional mall, apartments, offices, and more recently, the PeaceHealth RiverBend Medical Center Campus. Twenty-years*

ago it would have seemed highly unlikely that PeaceHealth would build their new regional facility in Springfield. If the City had not had desirable, serviceable land available, PeaceHealth would probably not have located their new facility in Springfield. Over the last 20 years, employment and commerce in the Gateway area has become a local and regional economic engine and major employment center. In 2006, the Gateway area had 33% of Springfield's employment (more than 9,800 employees) and 33% of payroll in the city, at \$325 million. By 2009, Gateway accounted for nearly 36% of the city's employment and \$368 million in payroll. In 2013, employment in the Gateway area accounted for 40% of employment in Springfield (more than 10,700 employees) and 43% of payroll in the city."¹¹¹

Capacity to Absorb Growth within the Existing UGB

Prior to expanding an urban growth boundary, the City analyzed the capacity of land within the existing UGB to provide the needed sites, as required by Goals 9 and 14. As described in the City's findings under Goal 9, and in the CIBL/EOA, the City has demonstrated that the identified need for employment sites larger than 5 acres cannot reasonably be accommodated on land already inside the urban growth boundary. Therefore, the City chose to expand the boundary to include suitable large sites. As stated in the CIBL/EOA pages 95-98, the City determined that the large site need could not reasonably be accommodated through redesignation or site assembly and provided substantial evidence to support the conclusions reached.

- *"Redesignation of Smaller Sites. Springfield's land deficit cannot be met through redesignating a surplus of small industrial- and commercial-designated sites, most of which are smaller than 2 acres. Map 2-3 shows that these sites are scattered throughout the City, generally along Main Street or in Mid-Springfield. There are few opportunities for assembly of a contiguous, unconstrained site with a configuration that makes it developable. These areas do not and are not expected to provide large sites for target employers that require large sites." (emphasis added)*
- *"Even where small vacant sites are located adjacent to other small vacant sites, there are few places where a site larger than 5 acres could be assembled from small sites. There is probably no place where a 20-acre site could be assembled from small sites." (emphasis added)*
- *"Site assembly. Assembly of numerous small sites into 5 to 10 acre sites is difficult at best and often not feasible. Map 2-3 shows that of industrial- and commercial-designated sites are scattered throughout the City, generally along Main Street or in Mid- Springfield, and the majority of sites are smaller than 2 acres. Land assembly is difficult and often costly. Developers attempting land assembly often have difficulty assembling a site at a cost that makes development economically viable. When assembling land, developers often find that owners of*

¹¹¹ Kim Thompson, Oregon Employment Department, "The Gateway Area & Growth in Springfield", presentation to Gateway Development Committee, October 24, 2014.

key sites are not willing sellers, have unrealistic expectations of the value of their land, or cannot get agreement among multiple owners to sell the land. As a result, developers, especially developers of industrial buildings, typically choose to develop sites with one or two owners.” (emphasis added)

- *Need to expand the UGB to accommodate need for large sites. Springfield’s need for large sites cannot be met within the UGB. Meeting this need for large sites for large employers requires the City to expand its UGB into areas with suitable sites. These areas will have relatively large, flat sites with little parcelization and few owners, where businesses will have access to I-5 or a State highway.* (emphasis added)

The CIBL/EOA is the City’s inventory and analysis of commercial and industrial land required under Goal 9. As explained in the CIBL/EOA, and in the City’s findings under Goal 9, the City’s employment land need analysis, prepared by ECONorthwest, used a “site needs” approach, based on ECONorthwest’s expertise, trends and substantial evidence to determine the number of sites and the required characteristics [ORS 197.712(2)(c)¹¹² and the Goal 9 Administrative Rule.

The need to expand the UGB to address the City’s deficit of sites larger than 5 acres, including sites larger than 20 acres, was determined in the CIBL/EOA. The City’s findings under OAR 660-009-0020(1)(c), as explained in CIBL/EOA Chapter 5¹¹³ Land Capacity and Demand demonstrate that the City conducted analysis to determine how employment capacity could be provided within the existing UGB prior to expanding its urban growth boundary.

- The CIBL/EOA analysis identified lands with redevelopment potential.
- The CIBL/EOA analysis identified sites smaller than 5 acres with redevelopment potential in Table 2-11 and Table 5-1.
- The CIBL/EOA analysis identified sites larger than 5 acres with redevelopment potential in Table 2-11 and Table 5-1.

¹¹² ORS 197.712****“the Legislative Assembly finds and declares that, in carrying out statewide comprehensive land use planning, the provision of adequate opportunities for a variety of economic activities throughout the state is vital to the health, welfare and prosperity of all the people of the state. (2) By the adoption of new goals or rules, or the application, interpretation or amendment of existing goals or rules, the Land Conservation and Development Commission shall implement all of the following: (a) Comprehensive plans shall include an analysis of the communitys economic patterns, potentialities, strengths and deficiencies as they relate to state and national trends. (b) Comprehensive plans shall contain policies concerning the economic development opportunities in the community. (c) Comprehensive plans and land use regulations shall provide for at least an adequate supply of sites of suitable sizes, types, locations and service levels for industrial and commercial uses consistent with plan policies. (d) Comprehensive plans and land use regulations shall provide for compatible uses on or near sites zoned for specific industrial and commercial uses.”* (emphasis added)

¹¹³ CIBL/EOA, pp. 77-82,

- CIBL/EOA Table 2-12 presents a site-by-site evaluation of redevelopment potential of sites identified as potentially redevelopable in Table 2-11. Table 5-1 includes all of the sites identified as providing an opportunity for redevelopment of a 5-acre site (in Table 2-12) as potentially redevelopable sites over the planning period.
- The CIBL/EOA determined redevelopment capacity as follows:
 - All sites 5 acres and smaller that were identified as having redevelopment potential may redevelop over the 2010-2030 period.
 - Five sites between 5-20 acres and one site 20 acres and larger are likely to redevelop over the 2010-2030 period. Table 2-12 provides a site-by-site evaluation of redevelopment potential for sites larger than 5 acres.
 - As shown in CIBL/EOA Table 5-1, Springfield concludes that 188 industrial sites and 340 commercial and mixed use sites would redevelop to address land needs over the 20-year period. In addition to this assumption about redevelopment, Springfield concludes that all land needs on sites smaller than five acres would be accommodated through redevelopment.
- To accommodate Springfield’s forecast employment growth of 13,440 employees over the 2010-2030 planning period, the City’s CIBL/EOA assumes the following:
 - 14% of new employment (1,918 employees) will locate on land not designated for employment use, such as residential land (Table C-12).
 - 10% of new employment (1,344 employees) will locate in existing commercial or industrial built space, such as vacant buildings or office spaces (Table C-12).
 - 22% of new employment (about 2,921 employees) will locate on potentially redevelopable sites, where redevelopment results in an increase in the amount of employment accommodated on the site (Table 5-1 shows assumptions about potentially redevelopable sites and Table C-6 shows that need for sites smaller than 5 acres will be accommodated through redevelopment).
 - 54% of new employment (about 7,256 employees) will locate on land that is currently vacant, including land within the UGB and sites that Springfield does not currently have within the UGB (Table 5-1 and Table C-6).

As explained in the City’s findings under Goal 9, the City conducted the required analysis to determine how employment capacity could be provided within the existing UGB prior to expanding the UGB. The City conducted a reasonable level of analysis to determine redevelopment potential of sites within the existing UGB to add capacity. The City’s assumptions and conclusions are consistent with Goal 14 because the City’s CIBL/EOA determined how employment capacity could be provided within the existing UGB prior to expanding its urban growth boundary and the City’s policy choices were based on substantial evidence.

The CIBL/EOA provides substantial evidence to explain the City’s assumption about capacity reasonably likely to be provided by the “potentially redevelopable” sites larger than 5 acres to accommodate needed employment sites larger than 5 acres. The City conducted site-by-site evaluation of sites 5 acres and larger with redevelopment potential to determine whether it is reasonable for the City to assume

that some or all of these sites could meet the identified need for sites larger than 5 acres. As shown in CIBL/EOA (pp. 33-39), Table 2-12 and explanatory text, the City finds that is reasonable to assume that 7 of these 14 potentially redevelopable sites 5 acres and larger offer opportunities for redevelopment once site constraints, configuration issues, and existing employment uses are accounted for. These sites are:

- Six sites between 5 and 20 acres in size:
 - 12-acre site in the Jasper-Natron Special Heavy Industrial District
 - 10-acre site on 28th Street in Heavy Industrial
 - 8-acre site on 42nd Street in Heavy Industrial
 - 7-acre site at 28th and Marcola Road in Heavy Industrial
 - 6.5-acre site on 28th Street in Heavy Industrial
 - 6-acre site on Highbanks Road in Heavy Industrial

- One site larger than 20 acres in size:
 - 36-acre site in the Jasper-Natron Special Heavy Industrial District

The City assumed that all land needs for sites smaller than 5 acres could be accommodated on land already inside the urban growth boundary.

The City's assumptions, conclusions and policy choices about accommodating 46% of forecast employment growth on land already inside the UGB are reasonable and based on substantial evidence.

The City has conducted the required analysis and has provided sufficient evidence demonstrating that all of its employment needs cannot be accommodated on land already inside the urban growth boundary, thus the City proposed to amend the UGB to provide land designated to provide suitable sites larger than 5 acres and larger than 20 acres to meet those needs.

2030 Plan Compliance with Goal 14 [OAR 660-015-0000(14)]

Urban Growth Boundary and Urbanization Policies

Urban growth boundaries shall be established and maintained by cities, counties and regional governments to provide land for urban development needs and to identify and separate urban and urbanizable land from rural land.

Establishment and change of urban growth boundaries shall be a cooperative process among cities, counties and, where applicable, regional governments. An urban growth boundary and amendments to the boundary shall be adopted by all cities within the boundary and by the county or counties within which the boundary is located, consistent with intergovernmental agreements...

Amendment of Springfield's UGB is a cooperative process between the City of Springfield and Lane County. The City Council adopted the amended UGB on [REDACTED], Ordinance X; Lane County adopted the amended UGB on [REDACTED], Ordinance X.

Goal 14 addresses how cities and counties must plan and zone land within urban growth boundaries to manage the long term land supply:

“Urbanizable Land. *Land within urban growth boundaries shall be considered available for urban development consistent with plans for the provision of urban facilities and services. Comprehensive plans and implementing measures shall manage the use and division of urbanizable land to maintain its potential for planned urban development until appropriate public facilities and services are available or planned.”* OAR 660-015-0000(14)

The City's 2030 Plan Economic and Urbanization Element comprehensive policies identify specific industrial site needs and commercial mixed-use employment site needs and establish special planning requirements and zoning regulations to reserve these sites for the intended large site employment purposes.

The City amended the Metro Plan text to establish the Urban Holding Area - Employment (UHA-E) plan designation.

The City amended the Metro Plan diagram to apply the Urban Holding Area - Employment (UHA-E) plan designation to the lands added to the UGB to meet employment land needs.

The City amended the Springfield Development Code to establish the Agriculture – Urban Holding Area (AG) urban transition zoning to protect the large employment sites added to the UGB to meet employment land needs from land divisions and incompatible interim development.

The City amended the Springfield Zoning Map to apply the Agriculture – Urban Holding Area (AG) urban transition zoning to protect the large employment sites from land divisions and incompatible interim development.

The City's amendments to the comprehensive plan designate urbanizable lands suitable for employment, and protect those sites from land divisions and incompatible interim development by applying plan designations, comprehensive plan urbanization policies and implementing zoning measures.

Implementation of the 2030 Plan amendments will manage the interim use and division of urbanizable employment land with suitable parcel size, topographical and proximity characteristics that are necessary to meet specific operational required by targeted employment types.

Implementation of the 2030 Plan amendments will function to reserve lands with specific operational required by targeted employment types, as described in the City's EOA and substantiated with an

adequate factual base in the record, to maintain the land's potential for planned urban development of urban employment uses and densities, as required by Goal 14.

Implementation of the 2030 Plan amendments will manage the interim use and division of urbanizable employment land to maintain the land's potential for planned urban development of urban employment uses and densities until appropriate public facilities and services are available or planned, as required by Goal 14.

The City and Lane County adopted 2030 Urbanization Element policies to replace the more generalized regional policies in the Metro Plan. The 2030 Urbanization Element is the chapter of the 2030 Plan that guides future development in Springfield by describing how and where land will be developed and infrastructure provided to meet long term growth needs while maintaining and improving community livability. The purpose of the Urbanization Element is to inform and guide long range land use and public facilities planning to address Springfield's land needs for the planning period 2010-2030 in compliance with Statewide Planning Goal 14, Urbanization. The Urbanization Element establishes the comprehensive plan policies and zoning applicable to urbanizable lands within Springfield's Urban Growth Boundary (UGB) that are necessary to efficiently and effectively plan and manage the land supply as land uses transition from rural to urban. This policy direction is based on the need to:

- Designate a 20-year supply of urbanizable land to accommodate population and employment growth.
- Allow and regulate interim land uses that do not impede future development of planned urban land uses and densities.
- Plan for the orderly and efficient extension of public facilities and services.
- Designate land for community open space and recreational needs.
- Designate land to provide and manage the public facilities and environmental services needed to serve Springfield's urban area.
- Manage growth and improve community livability through increasingly efficient use of land consistent and compatible with the community's needs, resources, opportunities and advantages within the broader Southern Willamette Valley region.

The guidelines in Goal 14 state that plans "should" designate sufficient amounts of urbanizable land to accommodate the need for further urban expansion, taking into account (1) the growth policy of the area; (2) the needs of the forecast population; (3) the carrying capacity of the planning area; and (4) open space and recreational needs.

Springfield's 2030 Plan designates sufficient amounts of urbanizable land to accommodate the needs of the forecast population's need for housing and employment; adds land designated Public/Semi-Public to accommodate a portion of the area's open space and recreational needs; and adds land designated Natural Resource and Public/Semi-Public to maintain open space, conserve resources, and conserve the quantity and quality of Springfield's drinking water supply. 2030 Urbanization Element policies require refinement-level comprehensive planning for the

lands designated Urban Holding Area – Employment to ensure that urban uses and densities can be accommodated within the carrying capacity of the planning area.

The guidelines in Goal 14 state: *“The size of the parcels of urbanizable land that are converted to urban land should be of adequate dimension so as to maximize the utility of the land resource and enable the logical and efficient extension of services to such parcels.”*

The urbanizable land added to the UGB in Springfield’s 2030 Comprehensive Plan is primarily large parcels in single ownership because Springfield’s employment land deficit is sites larger than 5 acres, including 3 sites larger than 20 acres. Parcels are of adequate dimension so as to maximize the utility of the land resource and enable the logical and efficient extension of services to such parcels. 2030 Urbanization Element policies require retention of UHA-E designated large parcels (20-acre and 50-acre minimum parcel sizes). The AG District includes provisions to limit the division of land and prohibit urban development. A 50-acre minimum lot size is applied to lots/parcels greater than 50 acres and a 20-acre minimum lot size is applied to lots/parcels less than 50 acres to protect undeveloped sites from inefficient piecemeal development until land is planned and zoned to allow annexation and site development with urban employment uses and densities.

The guidelines in Goal 14 state: *“Plans providing for the transition from rural to urban land use should take into consideration as to a major determinant the carrying capacity of the air, land and water resources of the planning area. The land conservation and development actions provided for by such plans should not exceed the carrying capacity of such resources.”*

The guidelines in Goal 14 state: *“Comprehensive plans and implementing measures for land inside urban growth boundaries should encourage the efficient use of land and the development of livable communities.”*

The 2030 Urbanization Element policies and AG zone land use regulations address the transition from rural to urban land uses and require newly urbanizable areas to be planned comprehensively to address air, land and water resources of the planning area — as required by Oregon and federal law — to ensure that urban uses and densities can provide needed capacity for employment growth and enhance overall community livability. The UGB Alternatives Analysis process addressed and compared the relative ESEE consequences of potentially suitable expansion location alternatives to assess potential threats or benefits to air, land and water resources. To determine capacity issues, the UGB Alternatives Analysis process included planning-level assessments of infrastructure (e.g. wastewater, water, stormwater management) and transportation facilities needed to serve alternate locations. The Metro Wastewater (MWMC) Treatment Facility has capacity to treat wastewater from the two proposed UGB expansion areas. The Urbanization Element provides policies and implementation strategies to implement the following goals:

UG-4 As the City grows and as land develops, maintain and reinforce Springfield’s identity as a river-oriented community emphasizing and strengthening physical

connections between people and nature in the City's land development patterns and green infrastructure systems.

UG-5 Increase Springfield's capability to respond to natural hazard impacts and to enhance public safety, health and robustness of the economy and natural environment. Create opportunities for innovative urban development and economic diversification.

Future design and development of public infrastructure and private development in the urbanizable lands designated Urban Holding Area – Employment will require the use of “green infrastructure” systems and other low impact development practices to manage stormwater, and to maintain and improve water quality. Refinement-level comprehensive planning will identify locations and/or conceptual alignments of “green infrastructure” systems.

2030 Urbanization Element Policy 50 states:

“Grow and develop the City in ways that will to ensure the stability of Springfield's public drinking water supply to meet current and future needs.

- ***Prior to City approval of annexation, land division or site development in the North Gateway and Mill Race UHA-E districts, the City — in partnership with Springfield Utility Board — shall conduct a Springfield Development Code Amendment process to prepare and apply specialized development standards that protect Drinking Water Source Areas to urbanizable lands designated UHA-E to ensure that new development contributes to a safe, clean, healthy, and plentiful community drinking water supply. The standards shall identify design, development, construction and best management processes appropriate and necessary to maintain aquifer recharge and protect drinking water quality and quantity. The standards shall also identify land use buffers appropriate and necessary to protect the Willamette Wellfield and the surface water features that are known to be in hydraulic connection with the alluvial aquifer.***
- ***Continue to Update the Springfield Comprehensive Plan and Springfield Development Code as new natural hazards information becomes available.***
- ***Encourage increased integration of natural systems into the built environment, such as vegetated water quality stormwater management systems and energy-efficient buildings.”***

2030 Urbanization Element Policy 51 states:

“Grow and develop the City in ways that maintain and improve Springfield's air quality to benefit public health and the environment.

- ***Prioritize and seek funding for mixed use land use district planning and multi-modal transportation projects that reduce reliance on single occupancy***

vehicles (SOVs) consistent with Springfield Transportation System Plan (TSP) Policy 1.2, 1.3 and 1.4.

- **Coordinate land use and transportation system planning for urbanizable lands at the refinement plan and/or Master Plan level to identify and conceptually plan alignments for locating multi – modal facilities.**
- **Plan, zone and design transportation systems in the North Gateway and Mill Race Urban Holding Area - Employment districts to provide multi-modal transportation choices for district employees.**
- **Promote the use of active transportation systems as new growth areas and significant new infrastructure are planned and developed.”**

The guidelines in Goal 14 state: *“The type, design, phasing and location of major public transportation facilities (i.e., all modes: air, marine, rail, mass transit, highways, bicycle and pedestrian) and improvements thereto are factors which should be utilized to support urban expansion into urbanizable areas and restrict it from rural areas.”*

The 2030 Plan amendments encourage and require the efficient use of land and development of livable communities within Springfield’s UGB by establishing a land base for employment that relies on existing developed land to meet 46% of employment growth; by accommodating 77% of employment growth within the existing UGB; by accommodating all employment land needs for sites smaller than 5 acres without expanding the UGB; by expanding the UGB to support economic diversification and job creation in areas that are proximate to the existing and planned public transit system; and through 2030 Plan Economic Element policies that promote higher density mixed-use development in locations served by the region’s Frequent Transit Network (FTN).

The City’s 2030 Plan directs urban expansion for employment to urbanizable sites within the existing UGB and UF-10 Overlay Zoning District through the annexation process and to newly urbanizable sites in the North Gateway and Mill Race UGB expansion areas. The City’s priority location for short term urban expansion is the Glenwood Riverfront/Franklin Corridor. In 2015, the area is beginning to urbanize, but many unincorporated urbanizable sites remain and are expected to redevelop in the planning period to provide sites to meet employment land needs. The area is part of the City’s Glenwood Urban Renewal District. The City is using tax increment financing to phase public facilities and services to support redevelopment of the area.

The UGB Alternatives Analysis process assessed the type, location and potential phasing of public facilities and services as important factors in reviewing the feasibility and cost of extending facilities and services to alternative locations for urban expansion. The City Engineer provided planning-level assessments of infrastructure (e.g. wastewater, water, stormwater management) and transportation

facilities needed to serve alternate locations and estimated costs associated with providing facilities and services. The Metro Wastewater (MWMC) Treatment Facility has capacity to treat wastewater from the two proposed UGB expansion areas. 2030 Plan Urbanization Element policies address urban expansion and extension of infrastructure.

Natural Resource (NR) Metro Plan Designation - North Gateway Site

Land in North Gateway brought into Springfield’s UGB to address 2010-2030 land needs for suitable large employment sites includes portions of properties within the floodway of the McKenzie River. Land in the floodway is considered to be constrained for development and is not counted as developable in the City’s land Inventories. Including the floodway portion of the site in the UGB allows consistent land use administration of the floodplain pursuant to the purposes and standards of the Springfield Development Code Floodplain Overlay District standards. The portion of the site North Gateway site within the FEMA floodway is designated Natural Resource, a designation applied to privately and publicly owned lands where development and conflicting uses are prohibited to protect natural resource values. In addition to the purposes of the Floodplain Overlay District, land designated Natural Resource is protected and managed for fish and wildlife habitat, soil conservation, watershed conservation, scenic resources, passive recreational opportunities, vegetative cover, and open space.¹¹⁴

Table 3: Urbanizable Land Designated Natural Resource (NR)			
Name of Area	Acres Designated Natural Resource	Acres Zoned AG	Location
North Gateway Natural Resource (NR)	53	53	North of Gateway/International Way, east of I-5

Conclusion Goal 14 OAR 660-015-0000(14): The land need determination and response to deficiency proposed in the 2030 Plan amendments are consistent with Goal 14, OAR 660-024-0040 and OAR 660-024-0050 because the amended UGB is based on demonstrated need for employment opportunities, livability public facilities, parks and open space. The City conducted the required inventory and analysis and assumed, based on substantial evidence that 77% of forecast employment could reasonably be accommodated within the existing UGB, and that the proposed UGB expansion is necessary to accommodate needs cannot reasonably be accommodated on land already inside the urban growth boundary. The City has a 223-acre deficit of suitable large employment sites with specific characteristics that are necessary for target industry employers the City selected in the CIBL/EOA. The City expanded the UGB to provide at least 223 suitable acres to meet the deficit.

¹¹⁴ Ordinance Exhibit C-1, 2030 Plan Urbanization Element, p. 12.

Division 24 Urban Growth Boundaries

OAR 660-024-0000 Purpose and Applicability

OAR 660-024-0000(4)

“The rules in this division adopted on December 4, 2015, are effective January 1, 2016, except that a local government may choose to not apply the amendments to rules in this division adopted December 4, 2015 to a plan amendment concerning the amendment of a UGB, regardless of the date of that amendment, if the local government initiated the amendment of the UGB prior to January 1, 2016.”

The 2030 Plan amendment of the UGB was initiated on December 31, 2009 and was prepared to address the requirements of the applicable statutes and rules in effect at that time, including ORS 197.298 and Division 24 Urban Growth Boundaries cert. ef. 4-16-09.

The City issued the public notice specified in OAR 660-018-0020 for the proposed plan amendment concerning the evaluation or amendment of the UGB on December 31, 2009, under the rules in Division 24 that were adopted prior to that date, and effective April 16, 2009.

OAR 660-024-0000(3)(c)

“A local government choice whether to apply this division must include the entire division and may not differ with respect to individual rules in the division.”

As permitted under OAR 660-024-0000(4) the City’s proposal applies Division 24 Urban Growth Boundaries cert. ef. 4-16-09.

Conclusion OAR 660-024-0000: The City’s proposal is consistent with OAR 660-024-0000. The City’s findings under Goal 14 are organized under ORS 197.298 and the Division 24 administrative rule effective prior to January 1, 2016.

OAR 660-024-0010 Goal 14 Definitions Applicable to Springfield’s UGB Analysis

OAR 660-024-0010 Definitions states:

“In this division, the definitions in the statewide goals and the following definitions apply...”

The definitions in the statewide goals and the following definitions in Division 24 are applicable to Springfield’s demonstration of compliance with Division 24:

(2) "EOA" means an economic opportunities analysis carried out under OAR 660-009-0015.

(7) "Safe harbor" means an optional course of action that a local government may use to satisfy a requirement of Goal 14. Use of a safe harbor prescribed in this division will satisfy the requirement for which it is prescribed. A safe harbor is not the only way or necessarily the preferred way to comply with a requirement and it is not intended to interpret the requirement for any purpose other than applying a safe harbor within this division.

(8) "Suitable vacant and developed land" describes land for employment opportunities, and has the same meaning as provided in OAR 660-009-0005 section (1) for "developed land," section (12) for "suitable," and section (14) for "vacant land."

The definition of "suitable" as provided in OAR 660-009-0005 section (12) is a key element in Springfield's inventory and analysis of employment land need, in the city's finding that all employment land needs cannot be met on lands within the UGB, and the City's decision to amend the UGB to add suitable land to meet identified employment land needs.

OAR 660-024-0020 Adoption or Amendment of a UGB

OAR 660-024-0020(1)

"All statewide goals and related administrative rules are applicable when establishing or amending a UGB, except as follows:

Pages 17-18 of these findings address the statewide goals and related administrative rules applicable when establishing or amending a UGB.

(a) The exceptions process in Goal 2 and OAR chapter 660, division 4, is not applicable unless a local government chooses to take an exception to a particular goal requirement, for example, as provided in OAR 660-004-0010(1);

(b) Goals 3 and 4 are not applicable;

(c) Goal 5 and related rules under OAR chapter 660, division 23, apply only in areas added to the UGB, except as required under OAR 660-023-0070 and 660-023-0250;

Pages 435-448 of these findings address Goal 5 as it applies only in areas added to the UGB, except as required under OAR 660-023-0070 and 660-023-0250.

(d) The transportation planning rule requirements under OAR 660-012-0060 need not be applied to a UGB amendment if the land added to the UGB is zoned as urbanizable land, either by retaining the zoning that was assigned prior to inclusion in the boundary or by assigning interim zoning that does not allow development that would generate more vehicle trips than development allowed by the zoning assigned prior to inclusion in the boundary;

Pages 481-526 of these findings address Goal 12.

(e) Goal 15 is not applicable to land added to the UGB unless the land is within the Willamette River Greenway Boundary;

The proposed UGB includes land within the Willamette River Greenway Boundary. Pages 424-428 of these findings address Goal 15.

(f) Goals 16 to 18 are not applicable to land added to the UGB unless the land is within a coastal shorelands boundary;

(g) Goal 19 is not applicable to a UGB amendment.

As stated on page 18, Goal 10 is not applicable.

Conclusion OAR 660-024-0020 (1) The City addressed all applicable statewide goals and related administrative rules when the City and Lane County amended the UGB.

OAR 660-024-0020(2)

“The UGB and amendments to the UGB must be shown on the city and county plan and zone maps at a scale sufficient to determine which particular lots or parcels are included in the UGB. Where a UGB does not follow lot or parcel lines, the map must provide sufficient information to determine the precise UGB location.”

Conclusion OAR 660-024-0020(2): Ordinance Exhibit A includes plan designation and zoning maps at a scale sufficient to determine which particular lots or parcels are included in the UGB. Exhibit C includes the amended UGB map at a scale sufficient to determine which particular lots or parcels are included in the UGB. Exhibit C-2 provides more detailed description of the amended boundary, providing sufficient information to determine the precise UGB location.

OAR 660-024-0030(1) Coordinated Population Forecast

“Counties must adopt and maintain a coordinated 20-year population forecast for the county and for each urban area within the county consistent with statutory requirements for such forecasts under ORS 195.025 and 195.036. Cities must adopt a 20-year population forecast for the urban area consistent with the coordinated county forecast, except that a metropolitan service district must adopt and maintain a 20-year population forecast for the area within its jurisdiction. In adopting the coordinated forecast, local governments must follow applicable procedures and requirements in ORS 197.610 to 197.650 and must provide notice to all other local governments in the county. The adopted forecast must be included in the comprehensive plan or in a document referenced by the plan.”

Springfield's current UGB (acknowledged in 2011) and amended UGB is based on a coordinated population forecast adopted by Lane County. In order to achieve timely compliance with their statutory obligations under ORS 197.304 (2007) Or Laws Chapter 650, the cities of Eugene and Springfield and Lane County co-adopted coordinated population forecasts into the Metro Plan for Springfield's jurisdictional areas. On June 17th, 2009, Lane County adopted a coordinated 20-year population forecast for each urban area within the county consistent with statutory requirements for such forecasts under ORS 195.025 and 195.036. The forecast provided separate forecasts for the metro urban area east of I-5 (Springfield) and west of I-5 (Eugene) through 2035. The City of Springfield adopted the 20-year population forecast for the urban area consistent with the coordinated county forecast. As described and demonstrated in the adopted findings for Lane County Ordinance PA1255; Springfield Ordinance 6248, adopted October 19, 2009 Springfield Planning File nos. LRP 2009-00005, LRP 2009-0006, the forecast was developed by Portland State University using commonly accepted practices and standards for population forecasting used by professional practitioners in the field of demography or economics, and was based on current, reliable and objective sources and verifiable factual information.

The adopted forecast has been included in the comprehensive plan. Eugene–Springfield Metro Plan text Chapter I, Introduction Purpose Section on page I-1 was amended to incorporate the forecast into the comprehensive plan. [Lane County Ordinance PA1255; Springfield Ordinance 6248, adopted October 19, 2009 Springfield Planning File nos. LRP 2009-00005, LRP 2009-0006].

The following text was inserted as the third paragraph of Metro Plan Chapter I, Introduction Purpose Section on Page I-1:

"In order to achieve timely compliance with their statutory obligations under 2007 Or Laws Chapter 650, the cities of Eugene and Springfield and Lane County adopt the following forecasts for their respective jurisdictional areas:

	2030	2035
<i>Eugene - City Only</i>	<i>194,314</i>	<i>202,565</i>
<i>Urban Transition Area West of I-5</i>	<i>17,469</i>	<i>16,494</i>
<i>Total</i>	<i><u>211,783</u></i>	<i><u>219,059</u></i>
<i>Springfield – City Only</i>	<i>74,814</i>	<i>78,413</i>
<i>Urban Transition Area East of I-5</i>	<i>6,794</i>	<i>6,415</i>
<i>Total</i>	<i><u>81,608</u></i>	<i><u>84,828"</u></i>

The 2030 Plan Urbanization Element, page 31 includes the adopted forecast:

	2030	2031	2032	2033	2034	2035
Springfield – City Only	74,814	75,534	76,254	76,974	77,693	78,413
Metro Urban Area East of I-5	6,794	6,718	6,642	6,567	6,491	6,415
Total	<u>81,608</u>	<u>82,252</u>	<u>82,896</u>	<u>83,541</u>	<u>84,184</u>	<u>84,828</u>

Conclusion OAR 660-024-0030. A coordinated population forecast for year 2030 of 81,608 for the City of Springfield and the Metro area east of I-5 was adopted into the comprehensive plan¹¹⁵ by Lane County, Springfield, and Eugene and acknowledged by the State. The forecast effectively provided coordinated projections for years ending 2030 through 2035 that were used as the basis for the Springfield 2030 planning purposes and plan policies adopted to meet residential and employment land needs for the 20-year planning period 2010-2030.

As explained in the City’s findings under Goal 9 (pages 46-47 of this report) and in the CIBL/EOA Appendix C Employment Forecast¹¹⁶, The 2030 UGB amendment relied on the 2006 employment forecast¹¹⁷ of 13,440 new employees for Springfield in the year 2030 to project employment land needs.

OAR 660-024-0040 20 Year Land Need Determinations

OAR 660-024-0040(1)

“The UGB must be based on the adopted 20-year population forecast for the urban area described in OAR 660-024-0030, and must provide for needed housing, employment and other urban uses such as public facilities, streets and roads, schools, parks and open space over the 20-year planning period consistent with the land need requirements of Goal 14 and this rule. The 20-year need determinations are estimates which, although based on the best available information and methodologies, should not be held to an unreasonably high level of precision.”

2030 Plan coordination of forecast land needs for 2010-2030 planning period. Springfield’s existing UGB is based on the adopted 2010-2030 population forecast for the urban area described in OAR 660-024-0030, and provides for needed housing land uses over the 20-year planning period consistent with the land need requirements of Goal 14 and this rule. [OAR 660-024-0040(1)] As previously stated in the City’s findings under Goal 9, the subject UGB amendment amends the UGB in consideration of employment land, public facilities, parks and open space needs for the same 2010-2030 planning period. Springfield chose to conduct concurrent land inventories and analyses to evaluate the capacity of its

¹¹⁵ Metro Plan p. I-2; Springfield Residential Land and Housing Needs Analysis, Table 5-1: 2010-2030 population growth equates to a 1% AAGR for the Springfield UGB.

¹¹⁶ ECONorthwest, CIBL/EOA, pages 153-158

¹¹⁷ The employment forecast in the adopted Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis, Appendix C.

UGB for housing needs and commercial/industrial land needs. Springfield began the Residential Land Study (RLS) in 2007 and the Commercial and Industrial Buildable Lands Study (CIBL) in 2008. Springfield chose to take actions in response to the simultaneous evaluations separately in order to meet the City's obligation under ORS 197.304 to adopt a separate Springfield UGB to meet its housing needs in a timely manner.

Springfield previously reviewed its UGB in consideration of one category of land need – housing. Springfield's acknowledged comprehensive plan (the Metro Plan) was amended to address Springfield's land need for housing and residential purposes for the planning period 2010-2030. Springfield has demonstrated that its acknowledged Urban Growth Boundary, comprehensive plan Residential Land Use and Housing Element policies and implementation actions will provide sufficient buildable lands for residential purposes within the urban growth boundary established pursuant to statewide planning goals to accommodate estimated housing needs for the 2010-2030 planning period. [Springfield Ordinance 6268 adopted June 20, 2011, and Lane County PA1274, acknowledged July 25, 2011 (DLCD File Number 009-09)] The subject 2030 Plan amendments were closely coordinated with Springfield's previously acknowledged comprehensive planning actions addressing Goal 10 and do not alter Springfield's existing acknowledged comprehensive plan designations, policies or land use regulations addressing housing needs for 2010-2030.¹¹⁸

Springfield Ordinance 6268 and Lane County Ordinance PA1274 identified a deficit of 300 acres to meet 2010-2030 public land, parks and open space needs. The subject UGB amendment partially addresses this category of land need — as explained in the City's findings under Goals 8 and 11 — by adding existing public parks, open space and public facilities to accommodate parks, open space and public facilities needs within the UGB and Metro Plan boundary. Inclusion of these lands (approximately 455 acres) within the Springfield UGB and Metro plan boundary enables and facilitates coordination and management of facilities /land use/transportation planning under consistent plan policies and land use regulations.

Conclusion OAR 660-024-0040(1). The 2030 Plan amendments amend the UGB to provide for employment and other uses including public facilities, streets and roads, parks and open space over the 2010-2030 planning period. The 2030 Plan UGB amendment, plan policies, plan designations and land use regulations implement Goal 14 Urbanization by providing urbanizable¹¹⁹ land in the Springfield UGB

¹¹⁸ Springfield was able to accommodate its 20-year residential growth needs without expanding the UGB. The City was able to meet its housing needs through redesignation of land in its Glenwood Nodal Development / MMS areas to meet the identified HDR deficit. The City adopted land use efficiency measures into the Springfield Development Code (Ordinance 6286) including 8 du/acre minimum density in the LDR zone, SLR small lot residential zone (3000 sq. ft. min lot size, etc.). Lands designated for residential uses are needed to meet forecast 2010-2030 residential land needs and thus cannot be redesignated to meet employment needs. Existing Mixed-use plan designations, zoning and the City's 2030 Comprehensive Plan policies require and support mixed-use development to meet Springfield's identified needs for multi-family housing.

¹¹⁹ Goal 14: ***“Urbanizable Land.*** *Land within urban growth boundaries shall be considered available for urban development consistent with plans for the provision of urban facilities and services. Comprehensive*

designated for urban development needs — based on a demonstrated need for employment opportunities, livability, public facilities, parks and open space for the planning period 2010-2030.

OAR 660-024-0040(2) Establishment of 2010-2030 Planning Period

“If the UGB analysis or amendment is conducted as part of a periodic review work program, the 20-year planning period must commence on the date initially scheduled for completion of the appropriate work task. If the UGB analysis or amendment is conducted as a post-acknowledgement plan amendment under ORS 197.610 to 197.625, the 20-year planning period must commence either:

(a) On the date initially scheduled for final adoption of the amendment specified by the local government in the initial notice of the amendment required by OAR 660-018-0020;”

The 2010-2030 planning period was established to commence on the 2010 date initially scheduled for final adoption of the amendment as stated in the City’s submittal [“Overview,” document, page 2, submitted to DLCDC December 31, 2009].¹²⁰ The 2010-2030 planning period is based on the beginning of the 20-year period specified in the coordinated population forecast for the urban area adopted by the city and county pursuant to OAR 660-024-0030 and the date initially scheduled for final adoption.

In 2010, a 20 year population forecast for the Springfield urban area was adopted into the Metro Plan [page I-2] for year 2030.

Springfield’s UGB analysis and 2030 Plan amendment is not part of periodic review work program. Springfield’s proposal is essentially a PAPA of the Eugene-Springfield Metro Plan that is “reviewed in the manner of periodic review” because it includes an amendment of the UGB. The study was initiated to meet the City’s obligation to establish a separate UGB from Eugene, in response to ORS 197.304, adopted into law in 2007:

ORS 197.304 Lane County accommodation of needed housing

(1) Notwithstanding an intergovernmental agreement pursuant to ORS [190.003](#) ([Definitions for ORS 190.003 to 190.130](#)) to [190.130](#) ([Effect of ORS 190.125](#)) or

plans and implementing measures shall manage the use and division of urbanizable land to maintain its potential for planned urban development until appropriate public facilities and services are available or planned. [OAR 660-015-0000(14)]

¹²⁰ The initial notice of the amendment was submitted on December 31, 2009, more than 20 days before the date of the first evidentiary hearing date of February 17, 2010, consistent with ORS 197.610 (1). The proposed 2030 Plan Metro Plan amendments (including residential, employment and urbanization elements and a proposal to expand the UGB) were the subject of the initial evidentiary hearing — conducted by the Springfield and Lane County Planning Commissions on February 17, 2010.

acknowledged comprehensive plan provisions to the contrary, a city within Lane County that has a population of 50,000 or more within its boundaries shall meet its obligation under ORS [197.295 \(Definitions for ORS 197.295 to 197.314 and 197.475 to 197.490\)](#) to [197.314 \(Required siting of manufactured homes\)](#) separately from any other city within Lane County. The city shall, separately from any other city:

(a) Establish an urban growth boundary, consistent with the jurisdictional area of responsibility specified in the acknowledged comprehensive plan; and

(b) Demonstrate, as required by ORS [197.296 \(Factors to establish sufficiency of buildable lands within urban growth boundary\)](#), that its comprehensive plan provides sufficient buildable lands within an urban growth boundary established pursuant to statewide planning goals to accommodate estimated housing needs for 20 years.

(2) Except as provided in subsection (1) of this section, this section does not alter or affect an intergovernmental agreement pursuant to ORS [190.003 \(Definitions for ORS 190.003 to 190.130\)](#) to [190.130 \(Effect of ORS 190.125\)](#) or acknowledged comprehensive plan provisions adopted by Lane County or local governments in Lane County. [2007 c.650 §2]

¹ “Sec.3 A local government that is subject to section 2 of this 2007 Act [197.304] shall complete the inventory, analysis and determination required under ORS 197.296(3) to begin compliance with section 2 of this 2007 Act within two years after the effective date of this 2007 Act [January 1, 2008]” (emphasis added)

The City commenced the Springfield 2030 Plan’s planning period on year 2010 to 1) mesh seamlessly with the County’s adopted coordinated population forecast period; to meet the City’s obligation to complete the housing inventory, analysis and determination before January 1, 2010, and 3) to closely coordinate Springfield’s residential and commercial/ industrial land inventories and analyses processes that would serve as the factual bases for the Springfield UGB and respective Springfield 2030 Comprehensive Plan policy elements.

The planning period 2010-2030 complies with OAR 660-024-0040(2)(a)and(b).

Conclusion OAR 660-024-0040(2). The 2010-2030 planning period is based on the beginning of the 20-year period specified in the coordinated population forecast for the urban area adopted by the city and county pursuant to OAR 660-024-0030 and the date initially scheduled for final adoption.

OAR 660-024-0040(3) Amending the UGB to Meet Employment, Public Land, Parks and Open Space Needs

“(3) A local government may review and amend the UGB in consideration of one category of land need (for example, housing need) without a simultaneous review and

amendment in consideration of other categories of land need (for example, employment need)."

The City and Lane County request approval of Springfield's review of the UGB in consideration of employment land need as explained in these findings and in response to the employment land need determination and factual basis contained in Ordinance Exhibit B-2: 2030 Plan Economic Element Technical Supplement CIBL/EOA Final Report 2015. The City and Lane County request approval of Springfield's UGB amendment adding approximately 257 acres of land designated "Urban Holding Area-Employment" to accommodate the identified need of at least 223 suitable acres for employment purposes.

The City and Lane County request approval of Springfield's review of the UGB in consideration of public facilities, parks and open space needs as explained in these findings and in response to the factual basis contained in Ordinance 6268, the Willamalane Parks and Recreation District need assessment and Comprehensive Plan (previously adopted as a refinement of the Metro Plan), the Metro Area Public Facilities and Services Plan, and Springfield Utility Board facilities plans. The City and Lane County request approval of Springfield's UGB amendment adding approximately 455 acres of land designated "Public/Semi-public."

Conclusion: OAR 660-024-0040(3). As previously stated in the City's findings under Goal 9, the City is amending the UGB in consideration of employment land needs. The 2030 Plan amendments also amend the UGB to provide public facilities, streets and roads, parks and open space over the 2010-2030 planning period.

OAR 660-024-0040(5) Determination of 20-Year Employment Land Need

"Except for a metropolitan service district described in ORS 197.015(13), the determination of 20-year employment land need for an urban area must comply with applicable requirements of Goal 9 and OAR chapter 660, division 9, and must include a determination of the need for a short-term supply of land for employment uses consistent with OAR 660-009-0025. Employment land need may be based on an estimate of job growth over the planning period; local government must provide a reasonable justification for the job growth estimate but Goal 14 does not require that job growth estimates necessarily be proportional to population growth."

Applicable requirements of Goal 9 and OAR Chapter 660, division 9 relating to determination of 20-year employment land need are focused on development and adoption of an Economic Opportunities Analysis (OAR 660-009-0015). As discussed under Goal 9 above, the City of Springfield has adopted an Economic Opportunities Analysis consistent with OAR 660-009-0015 requirements, including:

- 1) A trends analysis (CIBL/EOA Chapter 3, Economic Trends and Factors Affecting Future Economic Growth in Springfield);

- 2) Identification of long term and short term employment site needs (CIBL/EOA Chapter 4, Land Demand and Site Needs in Springfield, and Chapter 2, pp. 40-41 Analysis of Short Term Supply of Land);
- 3) Suitable lands inventory (EOA Chapter 2, Land Available for Industrial and Other Employment Uses); and
- 4) An assessment of community economic development potential (CIBL/EOA Chapters 3 & 4).

As explained in detail in Appendix C to the CIBL/EOA (Employment Forecast and Site Needs for Industrial and other Employment Needs), employment land need identified in the EOA is based on forecast employment growth over the planning period (13,440 new jobs through 2030).¹²¹ Springfield's population is forecast to reach 81,608 by 2030.¹²²

The results of the CIBL/EOA (Table 5-4 Employment site and land needs, Springfield UGB 2010-2030) indicate that Springfield's proposed current UGB does not provide sufficient land to meet Springfield's employment needs and economic development objectives, therefore Springfield must 1. adopt amendments to the comprehensive plan to address deficiencies; and 2. expand the UGB to provide suitable, serviceable land that can be designated to provide the appropriate site characteristics to meet the needs of target industries. Springfield has a land need for seven sites larger than 5 acres, including 3 sites larger than 20 acres (2 industrial sites 20 acres and larger; 1 commercial and mixed-use site 20 acres; and 4 commercial and mixed-use sites 5-20 acres in size).

Conclusions: OAR 660-024-0040(5). As demonstrated in the City's findings under Goal 9, Springfield's 20-year employment land need has been established in accordance with the applicable requirements of Goal 9 and OAR chapter 660, division 9, including a determination of the need for a short-term supply of land for employment uses consistent with 660-009-0025. The 2030 UGB uses the 2006 employment forecast of 13,440 new employees for Springfield in the year 2030 to project employment land needs, consistent with OAR 660-024-0040(5). The CIBL/EOA provides a reasonable justification for the job growth estimate, based on substantial evidence.

After accounting for available land supply and the results of efficiency measures, **Table 5-4 of the CIBL/EOA identifies employment needs that require expansion of the UGB as follows: Commercial and Mixed-Use (Land Need = 5 sites, 97 acres).** After accounting for vacant, partially-vacant and potentially redevelopable commercial and mixed use land supply within the UGB, there is an unmet need for 5 commercial and mixed-use sites totaling an estimated 97 acres.

Industrial (Land Need = 2 sites, 126 acres). After accounting for vacant, partially-vacant and potentially redevelopable industrial land supply within the UGB, unmet industrial need is identified as 2 large sites, totaling an estimated 126 acres.

The total employment land needed in the UGB expansion to meet site needs is 223 suitable acres:

¹²¹ CIBL/EOA Appendix C, p. 153-156.

¹²² Table 5-1, *Springfield Residential Land and Housing Needs Analysis*. 2010-2030 population growth equates to a 1% AAGR for the Springfield UGB.

3 sites larger than 20 acres and 4 sites 5-20 acres.

OAR 660-024-0040(7) Determination of 20-year land needs for transportation and public facilities

“The determination of 20-year land needs for transportation and public facilities for an urban area must comply with applicable requirements of Goals 11 and 12, rules in OAR chapter 660, divisions 11 and 12, and public facilities requirements in ORS 197.712 and 197.768. The determination of school facility needs must also comply with ORS 195.110 and 197.296 for local governments specified in those statutes.”

The City’s findings under Goals 11, 12 and OAR 660-024-0060 explain how 20-year land needs for transportation and public facilities were addressed in the 2030 Plan amendments to demonstrate continued compliance with applicable requirements of Goals 11 and 12, rules in OAR chapter 660, divisions 11 and 12, and public facilities requirements in ORS 197.712 and 197.768. The 2030 Plan amendments also amend the UGB and Metro Plan Boundary to include existing publicly-owned lands that accommodate public water system well fields and water treatment facilities and Willamalane Park and Recreation District parks and open space facilities, based on previously acknowledged need determinations.¹²³ These public uses are location-specific and cannot be accommodated on other land already inside the urban growth boundary.

Determination of lands needed for public facilities, parks and open space is established in the Metro Public Facilities and Services Plan, Springfield water, wastewater and stormwater facilities plans, and the Willamalane Park and Recreation District Comprehensive Plan. An unmet 300-acre deficit of public/semi-public land to meet park and recreation needs was previously identified in the Springfield RLHNA.

School facility needs were previously addressed in the acknowledged Residential Land and Housing Needs Analysis and existing UGB and are not addressed in the subject 2030 Plan amendments.¹²⁴

Conclusions: OAR 660-024-0040(7). The City provided substantial evidence to explain how the 2030 Plan amendments coordinate land use, transportation and public facilities planning to address applicable requirements of Goals 11 and 12, rules in OAR chapter 660, divisions 11 and 12, and public facilities requirements in ORS 197.712 and 197.768.

The City’s findings under Goals 8 and 11 provide reasonable justification for the **City and Lane County’s policy choice to include approximately 455 acres of existing public parks, open space and water system public facilities in the amended Springfield UGB and Metro Plan boundary**, based on previously

¹²³ *Willamalane Parks and Recreation Comprehensive Plan and Eugene-Springfield Metropolitan Area Public facilities and Services Plan*

¹²⁴ *Springfield Public Schools Administrative Facilities Plan*, January 1, 2010 “provides up-to-date data related to school district facilities, sites and enrollment and provides information to update our 2006 Facilities Plan. This report addresses the items laid out in ORS 195.110 requiring school facilities plans for large school districts.”

acknowledged need determinations.¹²⁵ These public uses are location-specific and cannot be accommodated on other land already inside the urban growth boundary.

OAR 660-024-0040(9) Use of safe harbor: OED Employment forecast

“The following safe harbors may be applied by a local government to determine its employment needs for purposes of a UGB amendment under this rule, Goal 9, OAR chapter 660, division 9, Goal 14 and, if applicable, ORS 197.296.

(a) A local government may estimate that the current number of jobs in the urban area will grow during the 20-year planning period at a rate equal to either:

(A) The county or regional job growth rate provided in the most recent forecast published by the Oregon Employment Department; or”

As stated in the CIBL/EOA page 156, OAR 660-024-0040(9)(a)(A) allows the City to determine employment land needs based on the county or regional job growth rate provided in the most recent forecast published by the Oregon Employment Department:

“Springfield is part of Region 5, which includes all of Lane County. Based on this safe harbor, employment in Springfield can be assumed to grow at 1.4% annually. Table C-2 shows the result of applying this growth rate to the total employment base of 41,133 in Springfield. Table C-2 shows that employment is forecast to grow by 13,440 employees (a 32% increase) between 2010 and 2030.”

Table C-2. Forecast of employment growth in Springfield’s UGB, 2010–2040

Year	Total Employment
2008	41,133
2010	42,284
2030	55,724
2030	55,724
2031	56,498
2032	57,283
2033	58,079
2034	58,886
2035	59,704
2036	60,534
2037	61,375
2038	62,228
2039	63,093
2040	63,970
Change 2010 to 2030	
Employees	13,440
Percent	32%
AAGR	1.4%

Source: ECONorthwest

¹²⁵ Willamalane Parks and Recreation Comprehensive Plan and Eugene-Springfield Metropolitan Area Public Facilities and Services Plan

Conclusion: OAR 660-024-0040(9). The CIBL/EOA employment land need determination for the 2010-2030 planning period was based on the best available information and accepted methodologies, including an employment forecast based on the county or regional job growth rate provided by the Oregon Employment Department, as allowed under OAR 660-024-0040(9)(a)(A).

Conclusion: OAR 660-024-0040. The CIBL/EOA employment land need determination was conducted concurrently with Springfield's (previously acknowledged) Residential Land Use and Housing Needs Analysis need determination for the same 2010-2030 planning period. Thus, the employment forecast and land need determination were coordinated¹²⁶ in response to the new split of the Metro Plan UGB between Springfield and Eugene; and to Springfield's policy decision to increase opportunities for employment to residents in the city over time while supporting Regional Economic Prosperity plan goals.

Throughout the multi-year public process, questions and assertions have been raised suggesting that the City's CIBL/EOA relies on "stale" information because the City has not updated the employment forecast or inventory data used in the analysis (since July 2008), and thus has not utilized the most current available information as the factual basis for the conclusions reached. Similar contentions of error were made by opponents of the Scappoose UGB decision. As stated in the Court of Appeals legal opinion for that case, such assertions were dismissed by LCDC: *"the choice between conflicting evidence is the city's. The appellants have not established and the commission does not find that a reasonable person could not have relied on the employment data the city used."*¹²⁷ In the Scappoose decision, the commission concluded that newer information submitted would not *"require the city to undertake multiple, shifting iterations of the same analysis as it moves through the planning and adoption process."*

The City respectfully considered all information presented throughout the multi-year planning process (2008-2016) and reasoned that none of the challenges to the Springfield inventory, analysis methodologies used, or conclusions reached would make it unreasonable for the City to rely on the employment and inventory data in the record that formed the basis of its CIBL/EOA. The City asserts that the inventory and analysis contained in the CIBL/EOA appropriately represents a "snapshot in time;" was coordinated with the County's population forecast for the 20-year period commencing on the date commencing on the date initially scheduled for final adoption of the amendment specified by the local government in the initial notice of the amendment required by OAR 660-018-0020; was prepared in full compliance with Oregon law and the applicable administrative rule; and utilized the county or regional job growth rate provided in the most recent forecast published by the Oregon Employment Department at the time the CIBL/EOA was prepared, as specifically allowed under the safe harbor provided under OAR 660-024-0040(9)(a)(A). The data base used to prepare the CIBL/EOA is the

¹²⁶ Metro Plan p. I-2. A year 2030 population forecast of 81,608 for the City of Springfield and the Metro area east of I-5 was adopted into the comprehensive plan by Springfield, Eugene and Lane County "in order to achieve timely compliance with the statutory obligations under ORS 197.304" and acknowledged by the State as the coordinated population basis for Springfield's 2030 Comprehensive Plan. [OAR 660-024-0030(1)]

¹²⁷ Zimmerman v. LCDC and City of Scappoose, LCDC 13UGB0001829; A153856, p. 524-525 (2014)

best available information at the time of CIBL/EOA preparation (2008-2009) — the pre-hearing formulation of the economic opportunities analysis developed in conjunction with the community visioning process and citizen involvement activities as fully documented in the local record. The employment land assumptions made and conclusions reached in the CIBL/EOA and the city’s policy choices in response to that land inventory and analysis were reasonable and are supported by substantial evidence in the whole record.

OAR 660-024-0050(1) Land Inventory and Response to Deficiency

“When evaluating or amending a UGB, a local government must inventory land inside the UGB to determine whether there is adequate development capacity to accommodate 20-year needs determined in OAR 660-024-0040...For employment land, the inventory must include suitable vacant and developed land designated for industrial or other employment use, and must be conducted in accordance with OAR 660-009-0015.”

Conclusion OAR 660-024-0050(1): The City’s findings under Goal 9, OAR 660-009-0015(3) Inventory of Industrial and Other Employment Lands (pages 53-59 of this report); OAR 660-009-0025(1) Identification of Needed Sites (pages 96-101) and under Goal 14 (pages 117-125 of this report) explain how Springfield inventoried land inside the UGB — including potentially redevelopable sites — in accordance with OAR 660-009-0015 to determine that there is not adequate development capacity to accommodate 20-year employment land needs determined in OAR 660-024-0040.

OAR 660-024-0050(3) Inventory of vacant land

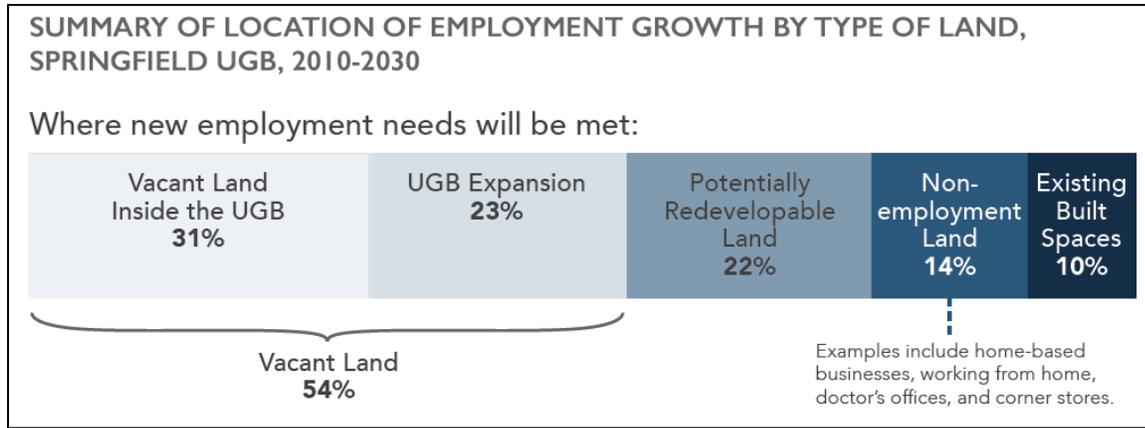
“As safe harbors when inventorying land to accommodate industrial and other employment needs, a local government may assume that a lot or parcel is vacant if it is:

(a) Equal to or larger than one-half acre, if the lot or parcel does not contain a permanent building; or

(b) Equal to or larger than five acres, if less than one-half acre of the lot or parcel is occupied by a permanent building.”

The City did not choose to use the safe harbor. The City’s findings under Goal 9, OAR 660-009-0005, (pp. 30-31), and OAR 660-009-0015(3)(a)(B) (p. 57) explain how the CIBL/EOA defined vacant land. “Vacant” is defined in Chapter 2 of the CIBL/EOA as follows:

“Tax lots that have no structures or have buildings with very little value. For the purposes of this inventory, lands with improvement values under \$10,000 (2008 Lane County Assessment and Taxation Data) are considered vacant (not including lands that are identified as having mobile homes).” This definition of “vacant” is more inclusive than what OAR 600-009-0005(14) requires, with the result that Springfield’s inventory includes more available land in the inventory than it would if the OAR600-009-0005(14) definition is used.”



Based on the inventory, the City’s CIBL/EOA and 2030 Plan assumes that 31% of forecast employment will be met on vacant land within the existing UGB. CIBL/EOA Maps 2-3, 2-4 and 2-5 p. 24-26 show where these lands are located and where sites with absolute development constraints were deducted from the inventory.

Conclusion OAR 660-024-0050(3): The Springfield CIBL/EOA used a definition of “vacant” that is more inclusive than what OAR 600-009-0005(14) requires, with the result that Springfield’s inventory includes more available land in the inventory than it would if the OAR600-009-0005(14) definition is used. 31% of forecast employment will be met on vacant land within the existing UGB.

OAR 660-024-0050(4) amending the comprehensive plan to satisfy the need deficiency, either by increasing the development capacity of land already inside the city or by expanding the UGB, or both

“If the inventory demonstrates that the development capacity of land inside the UGB is inadequate to accommodate the estimated 20-year needs determined under OAR 660-024-0040, the local government must amend the plan to satisfy the need deficiency, either by increasing the development capacity of land already inside the city or by expanding the UGB, or both, and in accordance with ORS 197.296 where applicable. Prior to expanding the UGB, a local government must demonstrate that the estimated needs cannot reasonably be accommodated on land already inside the UGB. If the local government determines there is a need to expand the UGB, changes to the UGB must be determined by evaluating alternative boundary locations consistent with Goal 14 and OAR 660-024-0060.”

As explained on pages 53-58 and in pp. 33-62 of this report, the CIBL/EOA inventory is consistent with OAR 660-009-0015.

OAR 660-024-0050(4) is addressed on pages 119-125 of this report. The City's findings under Goal 9¹²⁸ provide explanation of policies, implementation measures, plan designations and zoning adopted by the City and Lane County to address identified land needs.

Buildable lands. Springfield has 3,414 acres that are designated for industrial and other employment use. About two-thirds of the land designated for employment within Springfield's UGB is considered developed and is not expected to redevelop over the 20 year planning period. Less than 15% of this land is buildable, unconstrained land. The majority of buildable, unconstrained employment land in Springfield has existing development on it that is expected to redevelop over the planning period. Springfield has a lack of buildable large sites, with one buildable site 20 acres and larger and 22 buildable sites in the five to 20 acre size range.¹²⁹

Redevelopment potential. The analysis of potentially redevelopable land and need for employment land assumes that Springfield will have substantial redevelopment over the planning period. The analysis of potentially redevelopable land assumes that the employment capacity of redeveloped areas will increase, not simply that a new building will replace an old building. Consistent with City Council policies, the areas that are expected to have the most redevelopment are in Glenwood, especially along the Willamette Riverfront and Franklin/McVay corridor, and in the Downtown Urban Renewal District.¹³⁰

The Glenwood and Downtown redevelopment areas that are expected to have the most redevelopment are currently designated and zoned to require Mixed-use Nodal Development. The Glenwood Riverfront and Franklin/McVay corridor has been designated as a Mixed-use Multi-modal Area (MMA) pursuant to the Goal 12 administrative rule. Employment in these areas is currently served or is planned to be served by the region's Frequent Transit Network. The City's allocation of employment growth to land designated and zoned to require Mixed-use Nodal Development contributes to the region's commitments to implement Transportation Planning Rule Alternative Performance Measures to reduce reliance on automobiles and Vehicle Miles Travelled (VMT).

The CIBL/EOA pages 33-38 provides a site-by-site evaluation of "Potentially Redevelopable" sites within the existing UGB that are larger than 5 acre¹³¹s. That analysis assumed that 1 needed site larger than 20 acres and 6 needed sites 5-20 acres in size could be accommodated without expanding of the UGB.

Springfield's CIBL/EOA assumes the City will be able to meet all employment land needs on sites five acres and smaller within the existing UGB, through redevelopment, infill development, and employment uses on non-employment land (e.g., home occupations).

¹²⁸ See City's findings under OAR 660-009-0020(1)(a), (b), (c), OAR 660-009-0025(3), OAR 660-009-0020(2), OAR 660-009-0020(3), OAR 660-009-0020(4), OAR 660-009-0020(5), OAR 660-009-0020(6), OAR 660-009-0025(8), OAR 660-009-0020(7), OAR 660-009-0025, OAR 660-009-0025(1), OAR 660-009-0025(3), OAR 660-009-0025(6) pages 63-116 of this report.

¹²⁹ CIBL/EOA, p. 95-96

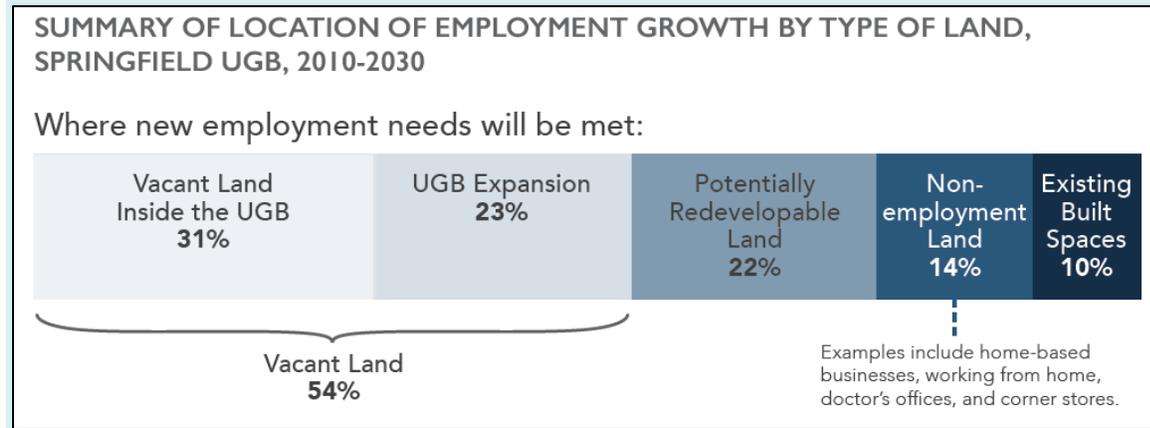
¹³⁰ Ibid

¹³¹ Explained on page 68 -69 of this report

Conclusions OAR 660-024-0050(4): The City conducted a thorough commercial and industrial lands inventory in accordance with OAR 660-009-0015.

OAR 660-024-0050(4) is addressed on pages 119-125 of this report.

The City’s findings explain how development capacity inside the UGB was determined, and how the CIBL/EOA assumed that 77% of forecast employment would be accommodated within the existing UGB.



The City and Lane County adopted the inventory into the comprehensive plan (Ordinance Exhibit B-2, CIBL/EOA).

The City and Lane County adopted 2030 Plan Economic Element and Urbanization Element comprehensive plan policies — as described in pages 66-77 of this report — effectively providing land use controls to manage the land supply efficiently in support of these assumptions.

Prior to expanding the UGB, the City demonstrated that the need for larger employment sites cannot reasonably be accommodated on land already inside the UGB.

23% of forecast employment requires expansion of the UGB to provide suitable sites.

The CIBL/EOA demonstrates that the development capacity of land inside the UGB is inadequate to accommodate the estimated 20-year land needs for larger industrial and commercial mixed use sites to provide sites for the City’s target industry employers that require sites larger than 5 acres, including three sites larger than 20 acres.

Springfield determined there is a need to expand the UGB.

The 2030 Plan amendment expands the UGB to provide 257 acres of land designated for large site employment use to meet the deficit of 223 suitable acres.

Changes to the UGB must be determined by evaluating alternative boundary locations consistent with Goal 14 and OAR 660-024-0060.

OAR 660-024-0050(5) Difference between the estimated 20-year needs determined under OAR 660-024-0040 and the amount of land and development capacity added to the UGB

(5) "In evaluating an amendment of a UGB submitted under ORS 197.626, the director or the Commission may determine that a difference between the estimated 20-year needs determined under OAR 660-024-0040 and the amount of land and development capacity added to the UGB by the submitted amendment is unlikely to significantly affect land supply or resource land protection, and as a result, may determine that the proposed amendment complies with section (4) of this rule."

34-acre difference between the estimated 20-year needs determined under OAR 660-024-0040 and the amount of land and development capacity added to the UGB by the submitted amendment. The employment land UGB amendment UGB includes a total of 273 gross acres, including right of way and portions of parcels with development constraints. 2030 Urbanization Element, page 11, Table 2 provides the following summary:

Name of Area	Acres Designated UHA-E	Acres Zoned AG	# of Suitable employment acres (UHA-E)	Location
North Gateway UHA -E	139.4 gross acres (includes right of way)	193	132.1 suitable acres	North of Gateway/International Way, east of I-5
Mill Race District UHA-E	133 gross acres (includes right of way)	135	125 suitable acres	South of Main Street, via South 28 th and M Streets

The employment land UGB amendment adds approximately 257 acres of land designated for employment (UHA-E) to provide at least 223 suitable acres to meet the 20-year employment site needs deficit, an overall difference of 34 acres. The 34-acre difference between the estimated 20-year needs determined under OAR 660-024-0040 and the amount of land and development capacity added to the UGB by the submitted amendment is unlikely to significantly affect land supply or resource land protection. The City and Lane County request the Director and Commission to approve the UGB as proposed.

The employment land UGB amendment includes a total of 132.2 unconstrained acres in the North Gateway UGB expansion area. The employment land UGB amendment includes a total of 125 unconstrained acres in the Mill Race UGB expansion area. The employment land UGB amendment includes "extra" land in the Mill Race UGB expansion area, pushing the total acres of land included to exceed the needed total of 223 suitable acres. Two ownerships (SUB and John) encompass 78.2

unconstrained acres in the Mill Race UGB expansion area. The City assumes that the 12.7 balance of the 223 acre land need would be met on a combination of the smaller parcels located south of the three large parcels, as shown in the map on the following page. One ownership (Reynolds) comprises 19.2 unconstrained acres. The Bales and Booth ownerships comprise at least 5 unconstrained acres. The City reasoned that including all of the parcels in the Mill Race UGB expansion area is reasonable, fair and justified as follows:

As shown in the map on the following page¹³², 10 of the 14 smaller parcels are located along existing South 28th, South M, and South 26th streets and right of way that currently provide access to the area and that would likely provide future access and services to the suitable large parcels owned by Johnson and Springfield Utility Board. Thus, including the smaller parcels in the UGB would support efficient and adequate provision of services to the 57-acre and 21-acre sites as the area is planned and developed for urban employment uses.

As shown in the map on the following page, leaving any of the smaller parcels (indicated with a white star) outside of the UGB would result in inefficient “island” of County-administered land use planning; would leave a potentially awkward and confusing “donut hole in the donut” of the Metro Plan Boundary and a somewhat odd configuration of the Lane Rural Comprehensive Plan boundary. In earlier work sessions, County Commissioners and City Councilors requested staff to seek UGB solutions that do not leave County-administered lands between the river the expanded UGB and Metro Plan boundary where possible. The full Mill Race map is included at Ordinance Exhibit A.

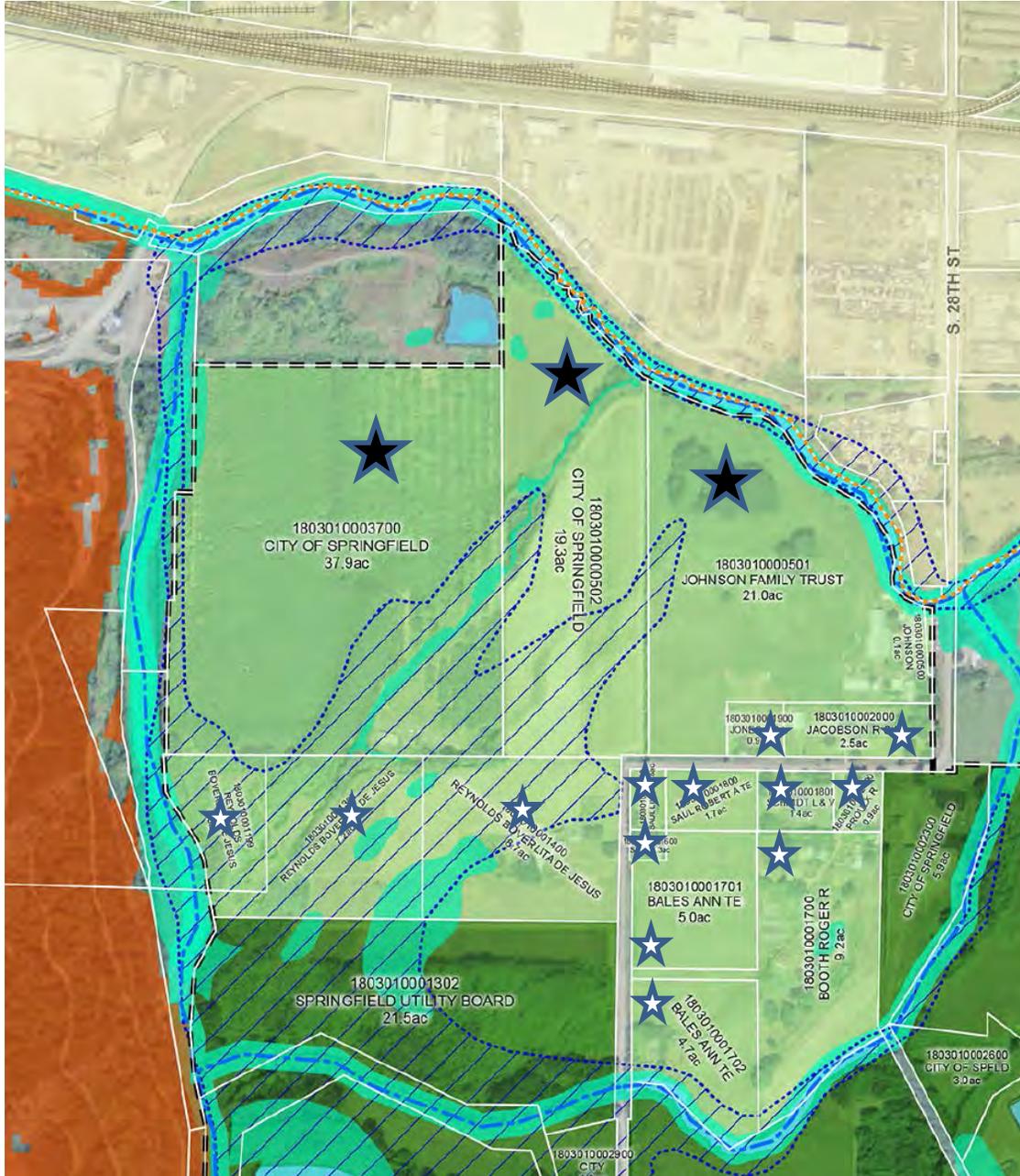
As shown in the map on the following page, the Mill Race UGB expansion area includes four waterways. These features are identified and discussed in the City’s findings under Goal 5. “Riparian resources areas” are identified in the City’s CIBL/EOA as an absolute development constraint. Riparian area buffers, as required in the Springfield Development Code, were deducted from the calculation of “unconstrained acres.” If the City is required to increase buffer requirements in response to pending future federal or state legislation, the “extra” acres included in the Mill Race UGB expansion may be needed to accommodate a portion of the 223-acre overall employment land need should the City’s calculation of “unconstrained” acres in the Mill Race area be adversely affected. Thus, the Director and Commission’s approval of the UGB as proposed will enable balancing of employment needs with resource protection needs consistent with Goal 14, as allowed under OAR 660-024-0050(5) and consistent with the City’s 2030 Urbanization Element Goal UG-3:

“Provide an adequate level of urban services, including but not limited to public water, wastewater, and stormwater management systems, environmental services and an urban multi-modal transportation system as urban development occurs within the Springfield UGB.”

and 2030 Urbanization Element Goal UG-4:

¹³² Ordinance Exhibit A Map: “Proposed UGB Expansion Area – Mill Race”

“As the City grows and as land develops, maintain and reinforce Springfield’s identity as a river-oriented community by emphasizing and strengthening physical connections between people and nature in the City’s land development patterns and infrastructure design.”



-  Suitable large parcels Mill Race UGB Expansion Area
-  Smaller parcels included in the UGB expansion

Conclusion OAR 660-024-0050(5). The City explained its rationale for including 34 “extra” acres of suitable land in excess of the 223-acre 20-year land it added to the UGB and requests approval of its choice.

OAR 660-024-0050(6)

“When land is added to the UGB, the local government must assign appropriate urban plan designations to the added land, consistent with the need determination. The local government must also apply appropriate zoning to the added land consistent with the plan designation or may maintain the land as urbanizable land until the land is rezoned for the planned urban uses, either by retaining the zoning that was assigned prior to inclusion in the boundary or by applying other interim zoning that maintains the land's potential for planned urban development. The requirements of ORS 197.296 regarding planning and zoning also apply when local governments specified in that statute add land to the UGB.”

Ordinance Exhibit A-2 Maps illustrate the appropriate urban plan designations Springfield and Lane County assigned to lands added to the UGB:

- Proposed Plan Designations – North Gateway shows lands designated Urban holding Area- Employment, Natural Resource and Public/Semi-Public.
- Proposed Plan Designations – Mill Race shows lands designated Urban holding Area- Employment and Public/Semi-Public.
- Proposed Plan Designations – Willamalane Properties shows lands designated Public/Semi-Public.

Ordinance Exhibit A-3 Maps illustrate the appropriate zoning Springfield and Lane County assigned to lands added to the UGB: the interim Agriculture-Urban Holding Area (AG) zoning that maintains the land's potential for planned urban development, and the Public Land and Open Space (PLO) zone.

- Proposed zoning - North Gateway shows lands zoned Agriculture-Urban Holding Area (AG) and lands zoned Public Land and Open Space (PLO).
- Proposed zoning - Mill Race shows lands zoned Agriculture-Urban Holding Area (AG) and lands zoned Public Land and Open Space (PLO).
- Proposed zoning - Willamalane Properties shows lands zoned Public Land and Open Space (PLO).

OAR 660-024-0050(6) is addressed in the City’s findings on pages 106-118 of this report.

Conclusion OAR 660-024-0050(6). The City and Lane County assigned appropriate urban plan designations to the added land, to meet specific land needs and siting characteristics identified in the employment land need determination and to designate and zone land accommodating existing public facilities, parks and open space with appropriate Metro Plan/Springfield 2030

Plan designations and Springfield zoning. The AG zone is an interim zoning that maintains the land's potential for planned urban development, maintaining the suitable employment as urbanizable land until the land is rezoned for the planned urban uses as described in the policies of the 2030 Plan Urbanization Element and AG Zoning District standards.

Conclusion OAR 660-024-0050. As explained in the City's findings and the CIBL/EOA, the City conducted inventories of 20-year land needs in accordance with the applicable statutes and rules and responded to the identified deficiencies as required under Goals 9 and 14.

DRAFT

VI. UGB Expansion Study

OAR 660-024-0060 Boundary Location Alternatives Analysis

OAR 660-024-0060(1)

“(1) When considering a UGB amendment, a local government must determine which land to add by evaluating alternative boundary locations. This determination must be consistent with the priority of land specified in ORS 197.298 and the boundary location factors of Goal 14, as follows:

(a) Beginning with the highest priority of land available, a local government must determine which land in that priority is suitable to accommodate the need deficiency determined under OAR 660-024-0050.

(b) If the amount of suitable land in the first priority category exceeds the amount necessary to satisfy the need deficiency, a local government must apply the location factors of Goal 14 to choose which land in that priority to include in the UGB.

(c) If the amount of suitable land in the first priority category is not adequate to satisfy the identified need deficiency, a local government must determine which land in the next priority is suitable to accommodate the remaining need, and proceed using the same method specified in subsections (a) and (b) of this section until the land need is accommodated.

(d) Notwithstanding subsection (a) to (c) of this section, a local government may consider land of lower priority as specified in ORS 197.298(3).

(e) For purposes of this rule, the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under section (5) of this rule, as well as other provisions of law applicable in determining whether land is buildable or suitable.”

OAR 660-024-0060(3)

“The boundary location factors of Goal 14 are not independent criteria. When the factors are applied to compare alternative boundary locations and to determine the UGB location, a local government must show that all the factors were considered and balanced.”

OAR 660-024-0060(4)

"In determining alternative land for evaluation under ORS 197.298, "land adjacent to the UGB" is not limited to those lots or parcels that abut the UGB, but also includes land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency."

OAR 660-024-0060(5)

"If a local government has specified characteristics such as parcel size, topography, or proximity that are necessary for land to be suitable for an identified need, the local government may limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298."

OAR 660-024-0060(6)

"The adopted findings for UGB adoption or amendment must describe or map all of the alternative areas evaluated in the boundary location alternatives analysis. If the analysis involves more than one parcel or area within a particular priority category in ORS 197.298 for which circumstances are the same, these parcels or areas may be considered and evaluated as a single group."

OAR 660-024-0060(7)

"For purposes of Goal 14 Boundary Location Factor 2, "public facilities and services" means water, sanitary sewer, storm water management, and transportation facilities."

OAR 660-024-0060(8)

"The Goal 14 boundary location determination requires evaluation and comparison of the relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services needed to urbanize alternative boundary locations. This evaluation and comparison must be conducted in coordination with service providers, including the Oregon Department of Transportation with regard to impacts on the state transportation system. "Coordination" includes timely notice to service providers and the consideration of evaluation methodologies recommended by service providers. The evaluation and comparison must include:

- (a) The impacts to existing water, sanitary sewer, storm water and transportation facilities that serve nearby areas already inside the UGB;*
- (b) The capacity of existing public facilities and services to serve areas already inside the UGB as well as areas proposed for addition to the UGB; and*
- (c) The need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements*

on existing roadways and, for urban areas of 25,000 or more, the provision of public transit service.”

The following section of this report provides empirical evidence and findings to explain how the City’s Boundary Location Alternatives Analysis was conducted consistent with each of the requirements of ORS 197.298 and OAR 660-024-0060. Beginning with the highest priority of land available, the City’s Preliminary Study Area included all land adjacent to the UGB, including land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency. The City evaluated the parcels within each priority to determine whether parcels are potentially suitable to satisfy the identified need deficiency determined under OAR 660-024-0050.

BOUNDARY ALTERNATIVES ANALYSIS STEP ONE: IDENTIFY SITE CHARACTERISTICS TO APPLY IN THE LOCATION ALTERNATIVES ANALYSIS PROCESS TO DETERMINE WHICH LANDS ARE SUITABLE TO ACCOMMODATE LAND NEED [OAR660-024-0060(1) and (4)]

As explained in the preceding section of this report (Goal 9), the CIBL/EOA ¹ provides a determination of the amount and type of land needed in the UGB amendment to accommodate Springfield’s employment land needs for 2010-2030.

OAR 660-009-0005 states that “the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under Section (5), as well as other provisions of law applicable in determining whether land is buildable or suitable.”

As explained in the City’s findings under Goal 9, the CIBL/EOA ² provides a determination that the amount and type of land needed in the UGB amendment to accommodate Springfield’s employment land needs for 2010-2030 is 223 suitable acres, including 3 sites larger than 20 acres, possessing the suitability characteristics specified under OAR 660-009-0005(5). Site and land needs are summarized in CIBL/EOA Table S-5:

¹ CIBL/EOA Table S-5, page ix.

² Ibid.

Table S-5. Employment site and land needs, Springfield UGB, 2010-2030

	Site Size (acres)			Total
	Less than 5	5 to 20	20 and Larger	
Industrial				
Sites needed	none	none	2	2
Land need (acres)	none	none	126	126
Commercial and Mixed Use				
Sites needed	none	4	1	5
Land need (acres)	none	37	60	97
Total sites needed	none	4	3	7
Total acres needed	none	37	186	223

Source: ECONorthwest

After accounting for available land supply and the results of efficiency measures, Table 5-4 of the CIBL/EOA identifies employment needs that require expansion of the UGB as follows:

Commercial and Mixed-Use (**Land Need = 5 sites, 97 acres**). After accounting for vacant, partially-vacant and potentially redevelopable commercial and mixed use land supply within the UGB, there is an unmet need for 5 commercial and mixed-use sites totaling an estimated 97 acres.

Industrial (**Land Need = 2 sites, 126 acres**). After accounting for vacant, partially-vacant and potentially redevelopable industrial land supply within the UGB, unmet industrial need is identified as 2 large sites, totaling an estimated 126 acres.

Total land needed in the UGB expansion of 223 suitable acres: 3 sites larger than 20 acres and 4 sites 5-20 acres.

The sites needed in the UGB expansion to meet special site needs meet the site requirements described on pages 82-95 of the CIBL/EOA Characteristics of Needed Sites.

Springfield has the need for sites larger than five acres: two Industrial sites on a total of 126 acres and five Commercial and Mixed Use sites on a total of 97 acres. The total number of acres needed in the UGB expansion is based on the average size of needed sites, as explained in CIBL/EOA Table S-3³.

Springfield needs to expand the UGB to meet its need for sites 5 acres and larger. Springfield has a deficit of four sites between 5 and 20 acres in size and three sites larger than 20 acres. Meeting the need for large sites for large employers requires the City to expand its UGB into areas with suitable sites. These areas will have relatively large, flat sites with little parcelization and few owners, with access to I-5 or a State highway.

³ ECONorthwest, CIBL/EOA, p. vii.

Springfield has a deficit of two Industrial sites 20 acres and larger, four Commercial and Mixed Use sites 5 to 20 acres in size, and one Commercial and Mixed Use site 20 acres and larger.

The City's CIBL/EOA⁴ identifies the number of sites by type reasonably expected to be needed to accommodate the expected employment growth based on the site characteristics typical of expected uses, as required under OAR 660-009-0015(2). The City's CIBL/EOA⁵ identifies site characteristics that make land suitable to accommodate the need deficiency determined under OAR 660-024-0050. The City identified the parcel size, topography, transportation access and access to city services site characteristics necessary for a site to be considered suitable for each type of target industry identified in the CIBL/EOA.

The tables in Chapter 5 and Appendix C provide data to document typical building and site needs of various industries.⁶ In addition to the evidence provided in the CIBL/EOA document, the record provides extensive supplemental evidence to explain the site needs of industries and the typical characteristics of sites that are necessary to support business operations and develop in accordance with applicable Federal, State and Local regulatory requirements.

Table C-5 "Characteristics of Sites Needed to Accommodate Employment Growth"⁷ presents and explains common site needs for expected industrial and other employment uses. Table C-5 summarizes 14 site attributes and explains how each attributes aligns with Springfield sites: flat site; parcel configuration and parking; soil type; road, rail, air, transit transportation; pedestrian and bicycle facilities; labor force; amenities; fiber optics and telephone; potable water; power requirements, and land use buffers.

The characteristics of sites needed to address the site needs of Springfield's target industries are explained in CIBL/EOA pp. 82-95 and are-summarized as follows:

⁴ ECONorthwest, CIBL/EOA, Chapter 4 and 5, Table 5-5, Appendix C

⁵ Ibid, pp. 82-95.

⁶ CIBL/EOA Chapter 5 and Appendix C.

⁷ CIBL/EOA. P. 167-169

Type of site and target industries	Site Size	Topography	Transportation Access	Access to City Services
<p>Target Industries: Medical Equipment High-tech Electronics and Manufacturing Recreational Equipment Furniture Manufacturing Specialty Food Processing</p> <p>Building Type: General Industrial</p> <p>Site Needs for: Manufacturing</p>	<p>Manufacturers similar to the target industries that needed sites larger than 5 acres who considered locating in Oregon or in the Eugene-Springfield area needed sites ranging in size from 10 acres to more than 100 acres.</p> <p>The size of sites needed by Springfield's target industries will vary by the size of building from 9-12 acre sites for 100,000 square foot buildings to 45-60 acre sites for 500,000 square foot buildings.</p> <p>The average size of existing sites with employment in Springfield is: 20+ acre site: 63 acres</p>	<p>The slope for manufacturing sites should be 5% or less. High-tech and Campus manufacturing can have a slope of 7% or less.</p>	<p>At the furthest, sites should be located within 15 miles or less of I-5 or a principal arterial road that is designated as a freight route. Most businesses in Springfield typically locate within one-mile of I-5 or within about one-half a mile of a state highway.</p>	<p>Access to Springfield's municipal water and wastewater system, with a minimum pipeline size of 8 to 10 inches (varies by target industry).</p>
<p>Target Industries: High Tech Services Corporate Headquarters Biotech Professional and Technical Services Back office Medical Services</p> <p>Building Type: Commercial and Other</p> <p>Site Needs for: Large Office Employers</p>	<p>Commercial office employers that needed sites larger than 5 acres who considered locating in Oregon needed sites ranging in size from 10 acres to 100 acres.</p> <p>The size of sites needed by Springfield's target industries will vary by the size of building from 4-6 acre sites for 50,000 square foot buildings to 16-24 acre sites for 200,000 square foot buildings.</p> <p>If a business park is developed to meet the site needs of these businesses, typical business park sizes in the Portland region are between about 30 and 75 acres.</p> <p>The average size of existing sites with employment in Springfield is:</p> <ul style="list-style-type: none"> • 5-20 acre site: 9.3 acres • 20+ acre site: 60 acres 	<p>The slope for manufacturing sites should be 5% or less. High-tech and Campus manufacturing can have a slope of 7% or less.</p>	<p>At the furthest, sites should be located within 15 miles or less of I-5 or a principal arterial road. Most businesses in Springfield typically locate within one-mile of I-5 or within about one-half a mile of a state highway.</p> <p>Sites should have access to mass transit within one-half mile.</p>	<p>Access to Springfield's municipal water and wastewater system, with a minimum pipeline size of 8 to 10 inches (varies by target industry).</p>

The following section of this report provides evidence to demonstrate how the City conducted the Boundary Location Alternatives Analysis to include land adjacent to the UGB and land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency.

BOUNDARY ALTERNATIVES ANALYSIS STEP TWO: DETERMINE PRIORITY OF LAND AS SPECIFIED IN ORS 198.298 TO DETERMINE PRIORITY OF LAND TO BE INCLUDED IN UGB AMENDMENT

To determine which lands to add to the UGB to meet the specified land needs, the City evaluated alternative boundary locations in accordance with the priority of land specified in ORS 197.298 and the requirements of the urbanization rule.

ORS 197.298 Priority of land to be included within urban growth boundary

“(1) In addition to any requirements established by rule addressing urbanization, land may not be included within an urban growth boundary except under the following priorities:

(a) First priority is land that is designated urban reserve land under ORS [195.145](#) (Urban reserves), rule or metropolitan service district action plan. (emphasis added)

(b) If land under paragraph (a) of this subsection is inadequate to accommodate the amount of land needed, second priority is land adjacent to an urban growth boundary that is identified in an acknowledged comprehensive plan as an exception area or nonresource land. Second priority may include resource land that is completely surrounded by exception areas unless such resource land is high-value farmland as described in ORS [215.710](#) (High-value farmland description for ORS 215.705).

(c) If land under paragraphs (a) and (b) of this subsection is inadequate to accommodate the amount of land needed, third priority is land designated as marginal land pursuant to ORS [197.247](#) (1991 Edition).

(d) If land under paragraphs (a) to (c) of this subsection is inadequate to accommodate the amount of land needed, fourth priority is land designated in an acknowledged comprehensive plan for agriculture or forestry, or both.

(2) Higher priority shall be given to land of lower capability as measured by the capability classification system or by cubic foot site class, whichever is appropriate for the current use.

(3) Land of lower priority under subsection (1) of this section may be included in an urban growth boundary if land of higher priority is found to be inadequate to

accommodate the amount of land estimated in subsection (1) of this section for one or more of the following reasons:

(a) Specific types of identified land needs cannot be reasonably accommodated on higher priority lands;

(b) Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or

(c) Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands. [1995 c.547 §5; 1999 c.59 §56]"

OAR 660-024-0060(1)(a)

"Beginning with the highest priority of land available, a local government must determine which land in that priority is suitable to accommodate the need deficiency determined under OAR 660-024-0050. "

OAR 660-024-0060(1)(e)

"For purposes of this rule, the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under section (5) of this rule, as well as other provisions of law applicable in determining whether land is buildable or suitable." (emphasis added)

OAR 660-024-0060(4)

"In determining alternative land for evaluation under ORS 197.298, "land adjacent to the UGB" is not limited to those lots or parcels that abut the UGB, but also includes land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency."

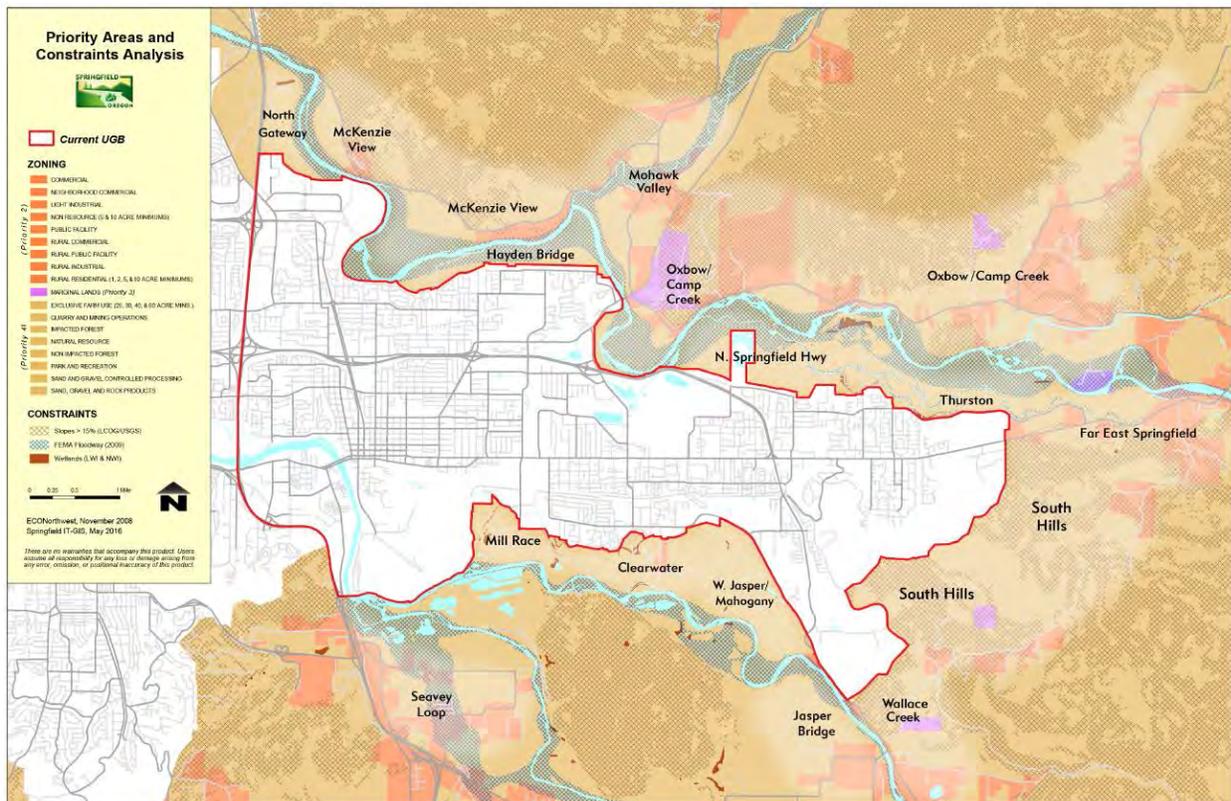
OAR 660-024-0060(6)

"The adopted findings for UGB adoption or amendment must describe or map all of the alternative areas evaluated in the boundary location alternatives analysis. If the analysis involves more than one parcel or area within a particular priority category in ORS 197.298 for which circumstances are the same, these parcels or areas may be considered and evaluated as a single group." (emphasis added)

The following section of this report explains how the City’s UGB alternatives analysis addressed ORS 197.298 and OAR 660-024-0060(4) to identify the preliminary UGB study area and to determine which land in the vicinity of the UGB within each priority is/is not suitable and thus has a reasonable potential to satisfy the employment land need deficiency determined under OAR 660-024-0050.

Methodology Used to identify candidate lands: UGB Study Area. To determine the priority of land to be included in the UGB to meet Springfield’s 2010-2030 land needs, the City established a study area that identified potential candidate lands under the four priorities of ORS 197.298. The City and consultant ECONorthwest conducted initial GIS scans of all land adjacent to and in the vicinity of the existing Springfield portion of the Metropolitan UGB (east of Interstate 5). The Eugene-Springfield Metro Plan identifies Interstate Highway 5 as the boundary between Springfield’s and Eugene’s jurisdictional areas. The acknowledged Springfield UGB follows the centerline of Interstate Highway 5. The City of Eugene is presently conducting an UGB alternatives analysis for lands located east of Interstate Highway 5.

As shown in Map 1, Priority Areas and Constraints Analysis, the lands surrounding the UGB were divided into 15 general groupings and named for study and communication purposes. The study area included all lands surrounding the UGB east of Interstate Highway 5, lands located along the McKenzie River and its tributaries north of Springfield’s UGB, lands in the southeast hills, and lands along the Middle Fork and Coast Fork of the Willamette River. The North Gateway and Seavey Loop study areas are located along Interstate Highway 5 north and south of Springfield respectively.



Map 1: Priority Areas and Constraints Analysis

Priority Areas and Constraints Analysis



Current UGB

ZONING

- COMMERCIAL
- NEIGHBORHOOD COMMERCIAL
- LIGHT INDUSTRIAL
- NON RESOURCE (5 & 10 ACRE MINIMUMS)
- PUBLIC FACILITY
- RURAL COMMERCIAL
- RURAL PUBLIC FACILITY
- RURAL INDUSTRIAL
- RURAL RESIDENTIAL (1, 2, 5, & 10 ACRE MINIMUMS)
- MARGINAL LANDS (Priority 3)
- EXCLUSIVE FARM USE (25, 30, 40, & 60 ACRE MINS.)
- QUARRY AND MINING OPERATIONS
- IMPACTED FOREST
- NATURAL RESOURCE
- NON-IMPACTED FOREST
- PARK AND RECREATION
- SAND AND GRAVEL CONTROLLED PROCESSING
- SAND, GRAVEL AND ROCK PRODUCTS

CONSTRAINTS

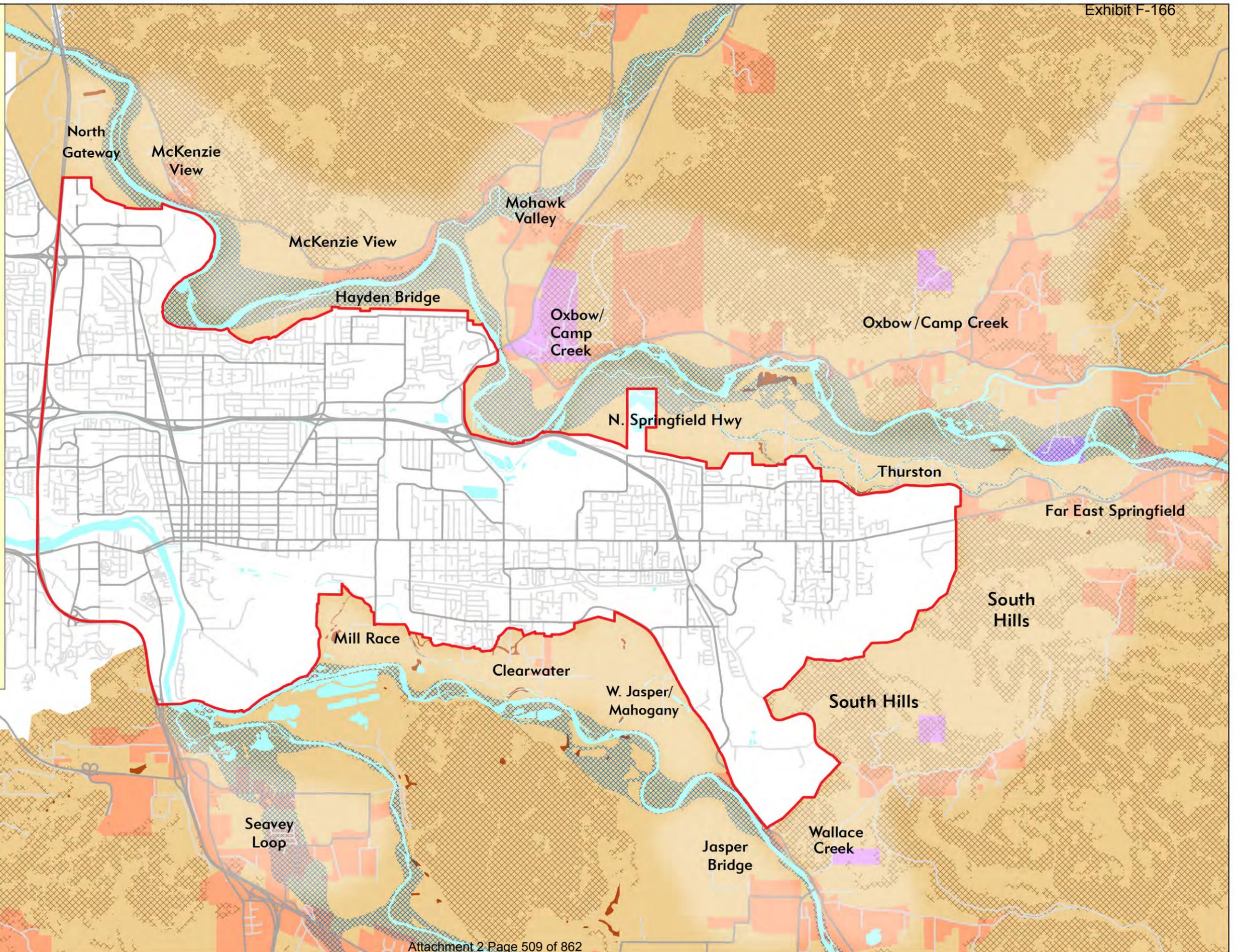
- Slopes > 15% (LCOG/USGS)
- FEMA Floodway (2009)
- Wetlands (LWI & NWI)

0 0.25 0.5 1 Mile



ECONorthwest, November 2008
Springfield IT-GIS, May 2016

There are no warranties that accompany this product. Users assume all responsibility for any loss or damage arising from any error, omission, or positional inaccuracy of this product.



UGB Study Area Groupings

North Gateway	McKenzie View	Hayden Bridge
Oxbow/Camp Creek	Mohawk	North Springfield Highway
Far East Springfield	South Hills	West Jasper/Mahogany
Wallace Creek	Jasper Bridge	Mill Race
Seavey Loop	Thurston	Clearwater

Conclusion: UGB Study Area: The City’s UGB Study Area is appropriate and consistent with the requirements of ORS 197.298(1)(b) and OAR 660-024 -0060(4) because it includes lands “adjacent to the UGB”, and it includes “land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency.” As explained in detail below, the land within the study area was analyzed in accordance with the state statutes and administrative rules that dictate the way in which a city must select lands for a UGB expansion.

OAR 660-024-0060 Boundary Alternatives Analysis:

“(1) When considering a UGB amendment, a local government must determine which land to add by evaluating alternative boundary locations. This determination must be consistent with the priority of land specified in ORS 197.298 and the boundary location factors of Goal 14, as follows:

(a) Beginning with the highest priority of land available, a local government must determine which land in that priority is suitable to accommodate the need deficiency determined under OAR 660-024-0050.

(b) If the amount of suitable land in the first priority category exceeds the amount necessary to satisfy the need deficiency, a local government must apply the location factors of Goal 14 to choose which land in that priority to include in the UGB.”

IDENTIFY FIRST PRIORITY: URBAN RESERVE.**ORS 197.298 (1)(a) Priority of land to be included within urban growth boundary**

“(1) In addition to any requirements established by rule addressing urbanization, land may not be included within an urban growth boundary except under the following priorities:

(a) First priority is land that is designated urban reserve land under ORS 195.145 (Urban reserves), rule or metropolitan service district action plan.”

The Eugene-Springfield Metro area has no designated urban reserves under ORS 195.145, therefore Springfield’s priority lands analysis begins with second priority land identified in an acknowledged

comprehensive plan as an exception area or nonresource land, and continues through third priority land designated as marginal, to fourth priority land designated as resource land, and finally to resource land in the order of land capability classifications VIII through I.

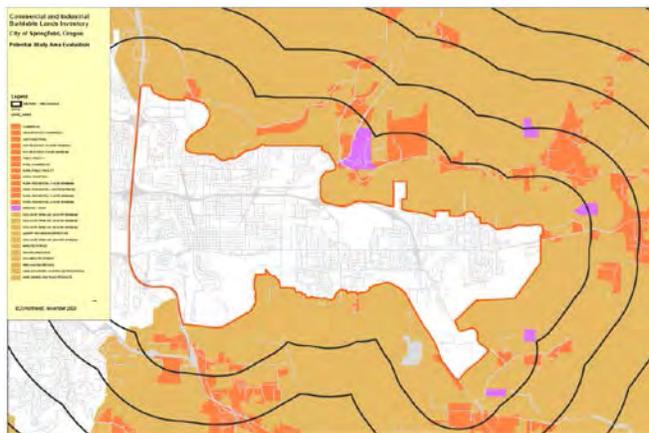
Conclusion ORS 197.298 (1)(a) First Priority Land: There are no Urban Reserves in the vicinity of Springfield or the Eugene-Springfield Metro area. No first priority land is available to accommodate the need deficiency determined under OAR 660-024-0050, thus the City looked to second priority land.

IDENTIFY SECOND PRIORITY: EXCEPTION AREA OR NON-RESOURCE LAND

ORS 197.298 (1)(b):

“If land under paragraph (a) of this subsection is inadequate to accommodate the amount of land needed, second priority is land adjacent to an urban growth boundary that is identified in an acknowledged comprehensive plan as an exception area or nonresource land. Second priority may include resource land that is completely surrounded by exception areas unless such resource land is high-value farmland as described in ORS [215.710 \(High-value farmland description for ORS 215.705\).](#)”

The UGB study area includes land adjacent to the UGB that is identified in the Lane Rural Comprehensive Plan as an exception area or nonresource land. These parcels are identified by orange color in Map 1 Priority Areas and Constraints Analysis.



Relative Location of Exception and Marginal Lands to the UGB

This diagram provides a graphic device to show a general distance relationship. The black rings indicate one-mile increments radiating out from the UGB. Direct access between some of the Exception Lands and Marginal Lands and the UGB is not possible because topography and rivers impede access. Proximity to the UGB, public facilities and transportation systems is a factor in subsequent steps of this analysis.

As shown in the map above, Springfield is unlike many Oregon cities in that there are few exceptions areas adjacent to or in the immediate vicinity of the UGB. Most exception parcels closest to the City are small developed rural residential parcels on land divisions approved by Lane County prior to adoption of SB100 (e.g. parcels on Clearwater Lane and parcels immediately east of the UGB) and thus not suitable for meeting Springfield’s large site employment land urbanization needs. Many of the exceptions parcels are remote and physically isolated from the City due to the natural barriers formed by the McKenzie and Middle Fork Willamette rivers, very steep topography of the Coburg Hills and Thurston South Hills, and other natural constraints that preclude building and site development. As shown in Map 1, and as explained in the following section of this report, most of the exceptions parcels areas in the vicinity of the UGB are located on the opposite side of the McKenzie and Middle Fork Willamette rivers, and many are constrained by slopes greater than 15%.

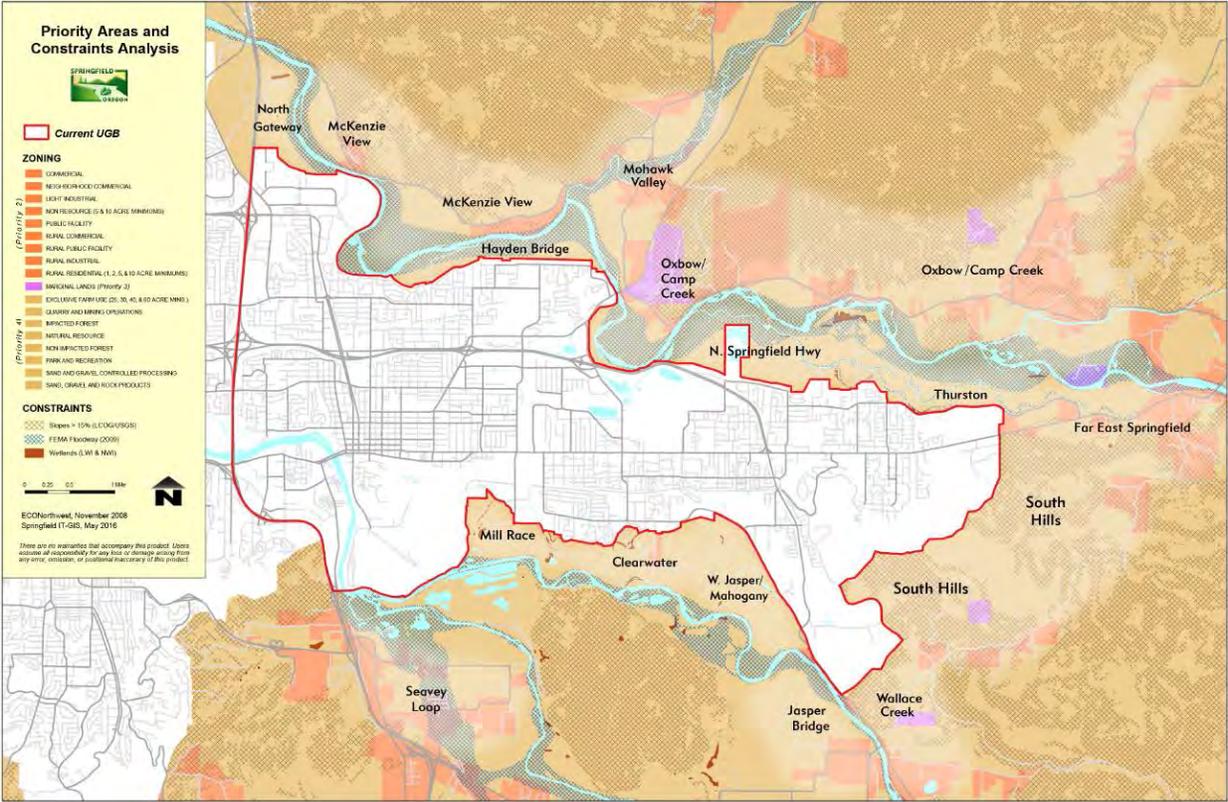


Table 1 Study Areas Containing Second Priority Exception Lands:

North Gateway	McKenzie View	Oxbow/Camp Creek
Hayden Bridge	Mohawk	North Springfield Highway
Far East Springfield	South Hills	West Jasper/Mahogany
Wallace Creek	Jasper Bridge	Mill Race
Seavey Loop	Thurston	Clearwater

Study areas with exception zoning are indicated by orange color

Nine groupings of exception parcels exist in the vicinity of the UGB east of I-5. The City included and evaluated all nine groupings of exception parcels in the UGB Study Area.

The City's UGB Study Area is appropriate and consistent with the requirements of ORS 197.298(1)(b) and OAR 660-024 -0060(4) because it includes lands "adjacent to the UGB", and it includes "land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency."

The City's UGB Study Area analysis properly began by identifying the highest priority of land available — exception land.

The City's analysis of UGB alternatives considered all exception land in the vicinity of the UGB when it established a UGB Study Area to identify candidate lands that may have a reasonable potential to satisfy the identified employment land need deficiency. [OAR 660-024-0060(4)]

OAR 660-024 0060(4)

(1) When considering a UGB amendment, a local government must determine which land to add by evaluating alternative boundary locations. This determination must be consistent with the priority of land specified in ORS 197.298 and the boundary location factors of Goal 14, as follows:

(a) Beginning with the highest priority of land available, a local government must determine which land in that priority is suitable to accommodate the need deficiency determined under OAR 660-024-0050.

To perform the next step in the analysis, the City conducted a parcel-by-parcel analysis of the highest priority of land – second priority exception land — adjacent to and in the vicinity of the UGB. The City compiled data in Table 2 to describe each exception land parcel or grouping of parcels. This step identified all candidate second priority exception areas and parcels that *could* potentially be added to the UGB if deemed suitable to accommodate the employment land need deficiency determined under OAR 660-024-0050. The City's description of each exception area in Table 2 includes maps and information to identify existing zoning, parcel sizes, map and tax lots numbers, existing land uses on developed parcels and general physical and locational characteristics.

The City's description of each exception area identified the presence of "absolute development constraints" (slopes >15%, floodway, wetlands, and riparian resource areas) on parcels to provide data to inform its determination of which second priority land parcels or portions of parcels *may* potentially be suitable to accommodate the employment land need deficiency determined under OAR 660-024-0050.

The City used industry standard GIS tools and mapping methods to quantify parcel and constraints data for evaluation. For the purposes of the preliminary screening of second priority land in Table 2, the City applied the same constraints criteria as those applied in the City's Commercial and Industrial Buildable Lands (CIBL/EOA) inventory of land inside the UGB:

- Slopes – slopes over 15% are considered unbuildable
- Floodway – areas within the floodway as mapped by FEMA are considered unbuildable

- Wetlands – areas identified in the national wetlands inventory or Springfield’s local wetlands inventory are considered unbuildable
- Riparian resource areas – areas identified by Springfield or Lane County as riparian resource areas are considered unbuildable.

In addition, the City’s Boundary Alternatives Analysis reviewed and considered:

- Lane County Plan Designation, Zoning and Goal 5 Natural resources map data
- Hydric Soils maps - to identify areas where potential wetlands may occur in the study area
- Springfield Water Quality Limited Waterways Map
- NRCS Soils data
- BPA facilities data
- RLID Regional Land Information Database – to determine ownership and % of soil map units within a parcel.
- Interviews with public agency staff and service providers to determine and compare the constraints, public service needs, ESEE consequences and economic advantages/disadvantages of study areas within each priority of land (ODOT, Union Pacific Railroad, ODFW, LTD, Willamalane Parks and Recreation District, SUB, EPUD, Lane County staff, OSU Extension Service, Oregon Department of Agriculture, LRAPA, EWEB, Springfield Police, Eugene-Springfield Fire and Life Safety, Rainbow Water District, Goshen Fire District, Willamette Water Company, Business Oregon, Oregon Department of State Lands, DLCD, and Oregon Business Development Dept.
- Information provided by with stakeholders, neighborhoods groups, landowners, McKenzie Watershed Council, Friends of Buford Park, and individual citizens throughout the multi-year planning process.

OAR 660-009-0005(2)

"Development Constraints" means factors that temporarily or permanently limit or prevent the use of land for economic development. Development constraints include, but are not limited to, wetlands, environmentally sensitive areas such as habitat, environmental contamination, slope, topography, cultural and archeological resources, infrastructure deficiencies, parcel fragmentation, or natural hazard areas. [emphasis added]

OAR 660-009-0005(11)

"Site Characteristics" means the attributes of a site necessary for a particular industrial or other employment use to operate. Site characteristics include, but are not limited to, a minimum acreage or site configuration including shape and topography, visibility, specific types or levels of public facilities, services or energy infrastructure, or proximity to a particular transportation or freight facility such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes."
(emphasis added)

The development constraints applied in the City's analysis Table 2 are constraints identified in OAR 660-009-0005(2) and site attributes identified in OAR 660-009-0005(11).

In Table 2, the City applied the "absolute development constraints" to parcels 5 acres or larger to calculate the acreage of unconstrained land within a parcel.

In Table 2, the City identified parcels with 5 or more acres of unconstrained land [OAR 660-009-0050(1)]. The City did not make deductions for existing development on parcels in this "first look" description step.

City appropriately applied constraints and site attributes consistent with OAR 660-009-0005(2) and OAR 660-009-0005(11) to the second priority land within the study area when it evaluated candidate parcels to include for employment purposes and when it identified parcels to exclude from further consideration.

The City's evaluation of constraints and site attributes on second priority land within the study area to inform its determination of which land in that priority is suitable to accommodate the employment land need deficiency is appropriate and consistent with OAR 660-024-0060(1)(a).

The City's analysis properly began with the highest priority of land available — exception land.

The City's analysis of UGB alternatives considered all exception land in the vicinity of the UGB when it applied its employment land suitability criteria (parcel size greater than 5 acres and land without absolute development constraints) to conduct the screen second priority lands in the preliminary study area.

The City's analysis of UGB alternatives applied parcel size and absolute development constraints uniformly to all second priority exception land in vicinity of the UGB that has a reasonable potential to satisfy the identified employment land need deficiency. (OAR 660-024-0060(4)).

This following section of the report "General Description of Second Priority Exception and Non-Resource Lands" provides explanation and evidence to support the City's findings addressing ORS 197.298(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060(1)(c), OAR 660-024-0060(1)(d), OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR 660-024-0060(5),

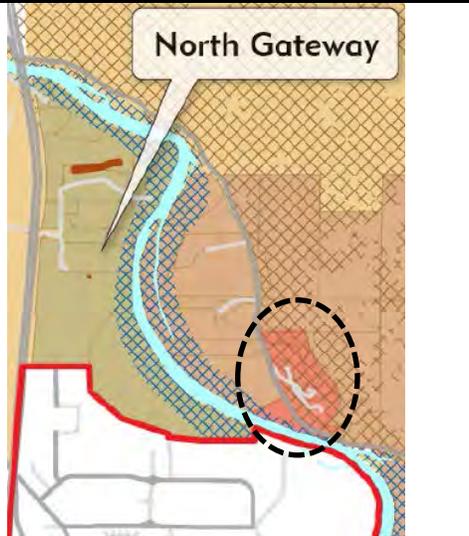
OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c).

General Description of Second Priority Exception and Non-Resource Lands

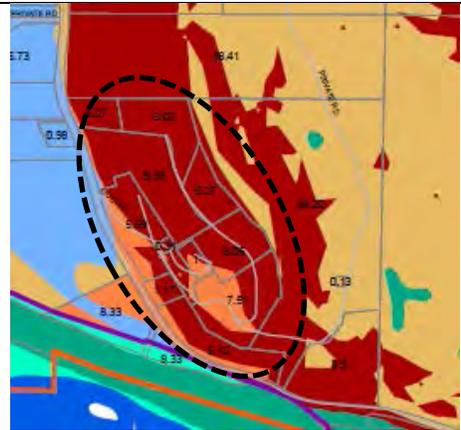
Table 2 provides the general descriptive summary of the second priority exception and non-resource lands in the vicinity of the UGB. Table 2 identifies parcels or portions of parcels containing 5 acres or more without slope, wetland, floodway, riparian resource or highly irregular parcel shape configuration constraints that *may* potentially be suitable to accommodate the employment land need. These parcels are indicated by their underlined map and tax lot number in Table 2. OAR 660-009-0005(14) states: *"Vacant Land" means a lot or parcel: (a) Equal to or larger than one half-acre not currently containing permanent buildings or improvements; or (b) Equal to or larger than five acres where less than one half-acre is occupied by permanent buildings or improvements."*

It should be noted that no deductions for existing rural development on parcels were made in Table 2. The few vacant parcels that exist are noted.

The red line in the maps below is the UGB.

Table 2: Second Priority Exception and Non-Resource Parcels and Constraints	
<p>McKenzie View A⁸</p> <ul style="list-style-type: none"> • Located across the McKenzie River from Springfield's Gateway/International Way Campus Industrial employment area • Zoned RR-10 • Parcelized Lane Cedar Plat • Slopes predominantly >25%, Witzel 116G rock outcrop • Bisected by BPA easement • Some floodway, wetlands, hydric soils and Goal 5 riparian resources along the McKenzie River • TL 800 RR-10 11.9 acre parcel flat topo, partially in floodway, developed with rural residential use, has only 4.6 unconstrained acres. • Separated from UGB by resource lands to west, east, and north • (0) parcels with 5 or more unconstrained acres: 	 <p>The map shows a section of land with a red line indicating the Urban Growth Boundary (UGB). A blue line represents the McKenzie River. A dashed black circle highlights a specific parcel. A callout box labeled 'North Gateway' points to an area north of the river. The map includes various terrain features like floodways and wetlands.</p>

⁸ See maps in record "Employment Opportunity Area 1 North Gateway Area – Potential Study Area Evaluation", ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; and copy of A & T map 17-03-14-00 with exceptions parcels highlighted. Slope percentages determined from NRCS data in the Lane County Regional Land Information Database



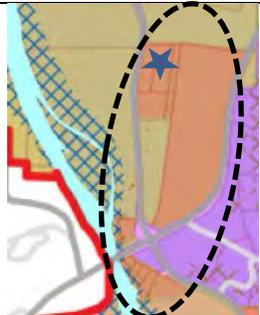
McKenzie View B

- Across the McKenzie River from Springfield
- RR-5 zoning
- Parcelized McKenzie View Estates, developed rural residential uses, 5-acre parcels are constrained by floodway and riparian resources
- Some floodway, wetlands, slopes >15%, and riparian resource constraints along the river frontage
- DOGAMI SLIDO mapped landslide areas Coburg Hills
- Separated from UGB by the river, EFU farmland between the river and the UGB, and the floodway
- (2) parcels with 5 or more unconstrained acres:
17-02-19-00 3000 (6.7ac.)
17-02-19-00 3100 (5 ac.)



TL 3000, 6.7 ac

TL 3100 5 ac

<p>Mohawk A⁹</p> <ul style="list-style-type: none"> • Adjacent to UGB and Marcola Rd. industrial employment area, but located across the McKenzie River. • The 50-acre EWEB parcel 17-02-20-00 407 is designated Industrial and zoned Rural Industrial, and the adjacent EWEB parcel to the south are designated Commercial and zoned Rural Commercial. Both are publicly owned land (EWEB). • Other smaller parcels are zoned Rural Residential. • Parcels on Camp Creek Rd. are .5 to 3.3 acre, developed with rural residential uses. • Some floodway, wetlands, slopes >15%, and riparian resource constraints along the river frontage • Exception parcels are located across Old Mohawk Road from Class I and II prime EFU farmland. • Marginal land parcels are located to the east and north. • Presence of hydric soils and visual reconnaissance suggests additional wetlands may be present. • Only one non-public land parcel is 5 acres or larger: <ul style="list-style-type: none"> ○ <u>17-02-20-00 202: 5.3 acres</u>, developed with rural residential use. 	 <p>Star indicates 5-acre parcel</p>
<p>Mohawk B¹⁰</p> <ul style="list-style-type: none"> • Across the McKenzie River from Springfield • Located .75 mile to more than 2 miles from UGB, not adjacent to UGB • Largest exception parcel <u>17-02-17-00 1313 (18.3 acres)</u> is zoned Rural Residential and developed with the Jasper Mountain Safe Center psychiatric and substance abuse hospital NAICS 622210. This use is expected to continue. • (1) Small Rural Industrial (RI) zoned parcels; are split by Marcola Rd. and separated from UGB by EFU land. <ul style="list-style-type: none"> ○ <u>17-02-17-00 1500 (5.7 ac., vacant)</u> ○ 17-02-17-00 1501 (1.9 ac.) ○ 17-02-17-00 1502 (1.5 ac.) ○ 17-02-17-00 1503 (2.4 ac.) <p>Mohawk River floodway, riparian resource, and slope constraints present.</p> 	



⁹ See maps in record “Employment Opportunity Area 2 Hayden Bridge Area – Potential Study Area Evaluation”, ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; and copy of A & T map 17-02-20-00 with exceptions parcels highlighted.

¹⁰ See maps in record “Employment Opportunity Area 2 Hayden Bridge Area – Potential Study Area Evaluation”, ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; and copy of A & T map 17-02-17-00 with exceptions parcels highlighted. Slope percentages determined from NRCS data in the Lane County Regional Land Information Database

- Rural Residential zoning: (2) RR5 parcels contain 5 or more unconstrained acres in size and are developed with rural residential uses.¹¹
 - 17-02-17-00 1600 (5.4 ac.)
 - 17-02-17-00 1309 (7 ac.)
 - 17-02-17-00 1316 (5 ac.) – irregular shape
 - 17-02-17-00 1318 (5 ac.) – irregular shape
 - 17-02-17-00 0905 (5 ac. has floodway, and riparian resource constraints)
 - 17-02-17-00 0201 (9.2 ac. has floodway, and riparian resource constraints)
- Smaller parcels east of Marcola Road are constrained by slopes >15% and >25%, contain wetlands, hydric soils.
- Smaller parcels west of Jasper Mt. Center 2.5 to 5 acres contain slopes >15% and >25%
- DOGAMI SLIDO mapped landslide areas
- BPA easement crosses this area
- Separated from UGB by land zoned for Exclusive Farm Use (EFU) including Class I soils.
- Mohawk River flooding
- Presence of hydric soils and visual reconnaissance suggests additional wetlands may be present.



17-02-17-00 1313
Jasper Mountain Safe Center



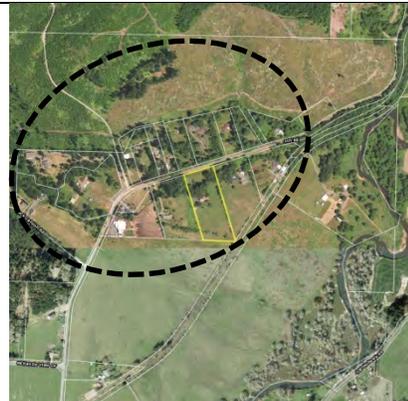
17-02-17-00 1502 1503 17-02-17-00 1501 17-02-01-00 1600



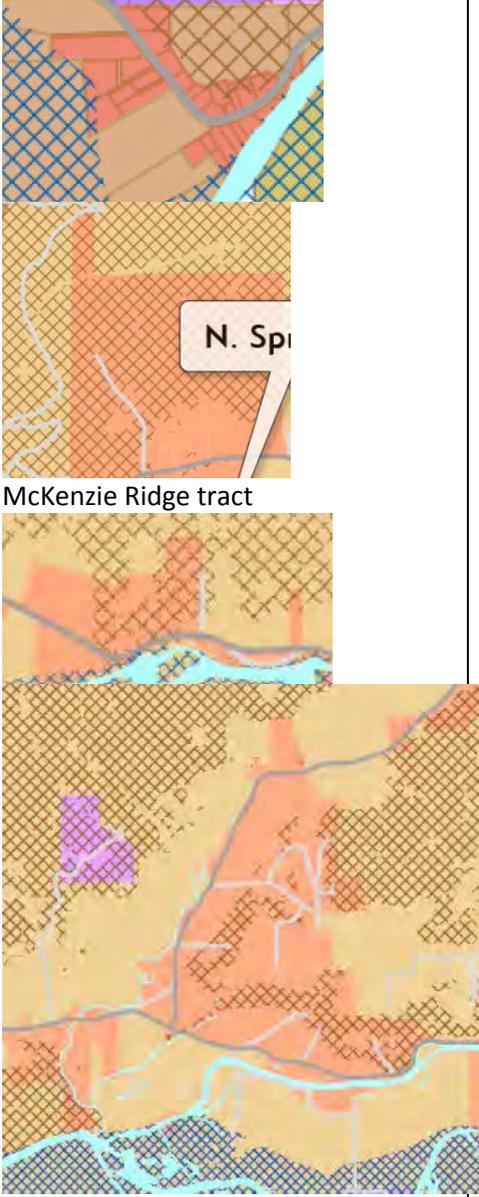
17-02-17-00 1309

Mohawk C.

- Across the McKenzie River from Springfield
- Remote and isolated, more than 2 miles from UGB, not adjacent to UGB
- Presence of hydric soils and visual reconnaissance suggests additional wetlands may be present
- DOGAMI SLIDO mapped landslide areas
- RR5 zoning, parcels 1.1-8.7 ac
- (6) parcels are 5 acres in size, largest is 8.7 acres, all are developed with rural residential uses:
 - 17-02-08-00 0515 (8.7 ac.)
 - 17-02-08-00 0516 (6.7 ac.)



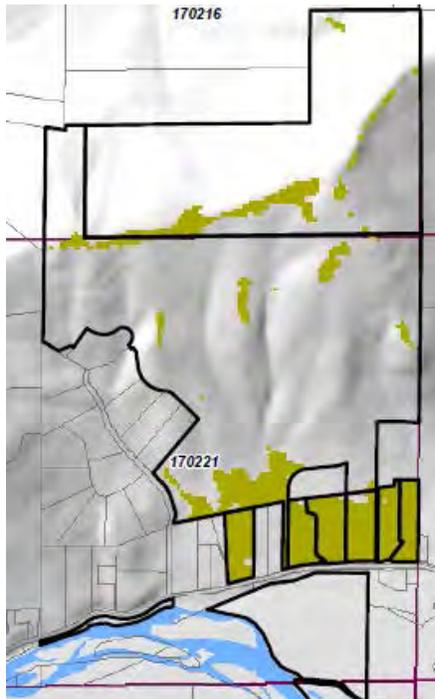
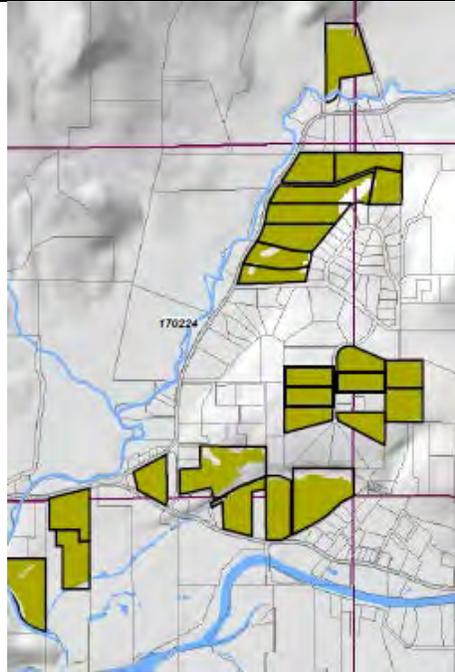
¹¹ See copy of A & T map 17-02-17-00 in the record with exceptions parcels highlighted.

<ul style="list-style-type: none"> ○ <u>17-02-08-00 0517 (6 ac.)</u> ○ <u>17-02-08-00 0600 (5.8 ac.)</u> ○ <u>17-02-08-00 0700 (5.7 ac.)</u> ○ <u>17-02-08-00 0701 (5.5 ac.)</u> 	
<p>Oxbow/Camp Creek¹²</p> <ul style="list-style-type: none"> • Across the McKenzie River from Springfield • Majority of area is not adjacent to UGB • RR5 zoning, primarily 1 and 5 acre parcels along Camp Creek • Rd. and RR-10 zoning Upper Camp Creek Rd., McKenzie Ridge Subdivision (RR5-NRES zoning), Shenandoah and Jo-Nette Subdivisions • Unconstrained parcels 5 acres or larger are distant from Springfield, 2-6 miles from UGB at Hayden Bridge • Slopes > 25% constrain much of this area • DOGAMI SLIDO mapped landslide areas • Floodway and riparian resource constraints along river frontage. • Two BPA easements cross this area • Parcels containing 5 or more unconstrained acres (<u>underlined</u>) are zoned for and developed with rural residential uses except where noted: <ul style="list-style-type: none"> ○ <u>17-02-29-00 800 (5.6 ac.)</u> ○ <u>17-02-21-00 107, (6.1 ac.)</u> ○ <u>17-02-21-00 113, (6 ac.)</u> ○ <u>17-02-21-00 128, (5.5 ac.)</u> ○ <u>17-02-21-00 129, (6.6 ac.)</u> ○ <u>17-02-21-00 801, (5 ac.)</u> ○ <u>17-02-21-00 802, (5 ac.)</u> ○ <u>17-02-22-00 500, (5 ac.)</u> ○ <u>17-02-22-00 600, (5 ac.)</u> ○ <u>17-02-26-00 704, (5.1 ac.)</u> ○ <u>17-02-26-00 2100, (6.6 ac., vacant)</u> ○ <u>17-02-25-00 1101 (8.1 ac.)</u> ○ <u>17-02-25-00 1103, (7.7 ac.)</u> ○ <u>17-02-25-00 1205, (10.4 ac.)</u> ○ <u>17-02-25-00 2600, (6.9 ac.)</u> ○ <u>17-02-24-00- 100 (7.8 ac.)</u> ○ <u>17-02-24-00- 134 (5.6 ac.)</u> ○ <u>17-02-24-00- 136 (8 ac.)</u> RR-10 ○ <u>17-02-24-00 138 (8.1 ac.)</u> ○ <u>17-02-24-00 141 (4.9 ac.)</u> ○ <u>17-02-24-00 143 (6.9 ac.)</u> ○ <u>17-02-24-00 144 (5.0 ac.)</u> 	 <p>McKenzie Ridge tract</p>

¹² See maps in record "Employment Opportunity Area 3 North Springfield Highway Area – Potential Study Area Evaluation", ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; and copies of Lane County Assessor's maps 17-02-21-00, 17-02-21-24, 17-02-21-31, 17-02-22-00, 17-02-24-00, 17-02-25-00, 17-02-29-00, 17-02-19-00, 17-01-30-00, 17-01-29-00, 17-01-29-20 with exceptions parcels highlighted. Slope percentages determined from NRCS data in the Lane County Regional Land Information Database.

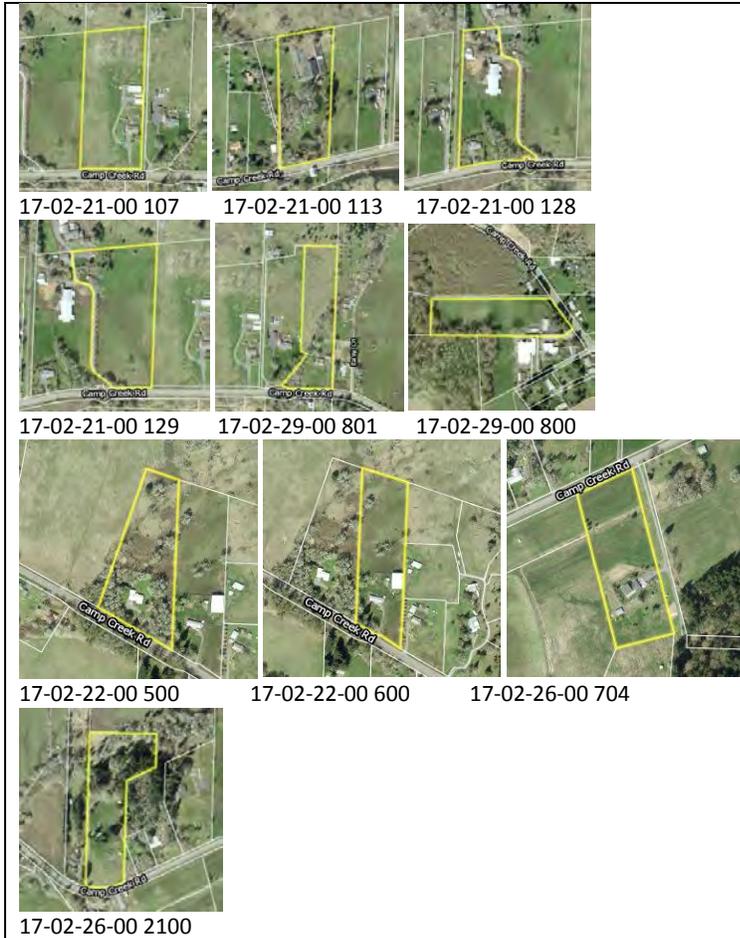
- 17-02-24-00 200 (6.8 ac.)
- 17-02-24-00 303 (5.0 ac.)
- 17-02-24-00 304 (5.0 ac.)
- 17-02-24-00 306 (5.0 ac.)
- 17-02-24-00 311 (5.0 ac.)
- 17-02-24-00312 (5.0 ac.)
- 17-02-24-00 313 (5.0 ac.)
- 17-02-24-00 1209 (11.6 ac.)
- 17-02-24-00 1400 (12.0 ac.)
- 17-02-24-00 1402 (7.7 ac.)
- 17-02-24-00 1501 (5.6 ac.)

- (1) large tract zoned RR5-NRES is vacant, but is constrained by slopes >15%:
 - 17-02-21-00 101 (19.7 ac.) unconstrained portions of McKenzie Ridge site are in SW corner of site (shown in green in map below). BPA easement crosses site.
 - 17-02-16-00 600 (11 ac.) unconstrained portions of McKenzie Ridge site are located along a ridgetop and in SW corner of site (shown in green in map below). BPA easement crosses site. Note this parcel has split zoning. The majority of this tract is F2 Impacted Forest resource land.¹³



17-02-21-00 101 & 17-02-16-00 600
(green indicates unconstrained portions of McKenzie Ridge tracts)

¹³ See GIS screen shot map: “Camp Creek Exception-Non Resource 17-02-16-00 600” depicting location of RR-NRES portion of tract



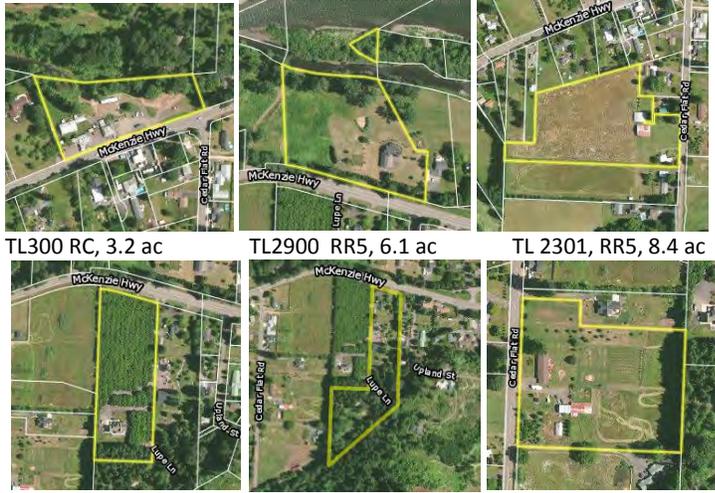
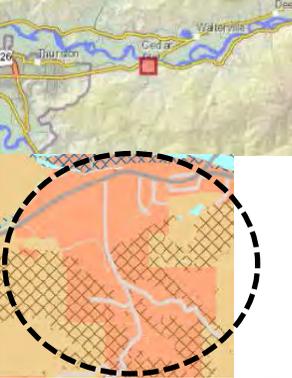
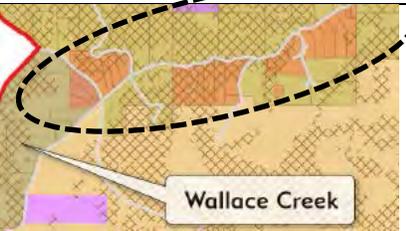
PF-designated land in **Oxbow/Camp Creek** area shown in purple

- Parcels designated and zoned Public Facility (PF) include three non-contiguous parcels scattered throughout the area, owned by City of Eugene (17-01-29-21 100), Eugene Water and Electric Board (17-02-25-00 200 and 17-02-25-00 2200). Parcels are publicly-owned, developed with and necessary for public facilities uses and are not available or suitable to meet Springfield’s employment land needs.
- Upper Camp Creek Rd. parcels are 6+ miles from UGB @ Hayden Bridge, or 5+ miles from UGB via Highway 126/Hendricks Bridge/Waltermville, remote, isolated, and abut resource land on three sides, north of Camp Creek.
- One parcel containing 5 or more unconstrained acres 17-02-24-00- 1501, (5.6 ac.) is zoned for and developed with Rural Commercial use, and is not available or suitable to meet Springfield’s employment land needs.

<p>Far East Springfield A¹⁴</p> <ul style="list-style-type: none"> • Parcelized Rural Residential (RR-2 zoning) • Some parcels abut eastern extent of UGB • Parcels abut McKenzie Highway or Thurston Rd. • Gay Creek bisects area • Cedar Creek riparian resources • Abuts large block of Class I and II prime farmland • Slopes >25% south of McKenzie Highway • DOGAMI SLIDO mapped landslide areas • Clement Plat • (2) non-contiguous parcels with 5+ unconstrained acres are within 1 mile of UGB: <ul style="list-style-type: none"> ○ <u>1702362401500 (6.4 acres)</u>, slopes >15%, developed residential use occupies highway side of parcel; ○ <u>1701312001500 (6.95 acres)</u>, developed residential use, entire property is sloped >12%, slopes >15% bisect the property between Hwy 126, developed with residential use, forested. 	 <p>Star indicates 5-acre residential parcels</p>
<p>Far East Springfield B¹⁵</p> <ul style="list-style-type: none"> • Parcelized Cedar Flats and Upper Cedar Flats Rd. community • Located more than 1.5 miles east of UGB, remote from Springfield, not adjacent to UGB • Separated from UGB by block of Class II prime farmland between McKenzie River and McKenzie Highway or by steep slopes • Bisected by Gay and Cedar Creeks • Predominantly RR-5 zoning, (<u>4 parcels with 5 or more unconstrained acres (underlined)</u>) <ul style="list-style-type: none"> ○ <u>1701322002800 (5.4 ac.)</u> developed with residential use and orchard & <u>1701322002801 (7.8 ac., same owner)</u> ○ <u>1701322002301 (8.3 ac.)</u> res/ag use; ○ 1701322002802, RR5, constrained by slopes >15%; ○ 1701322002802, RR5, constrained by slopes >15%; 	

¹⁴ See maps in record “Employment Opportunity Area 4 Far East Springfield Area – Potential Study Area Evaluation”, ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; A & T maps 17-02-36-10, 17-02-36-24, 17-01-31-20, and 17-01-31-00. Slope percentages determined from NRCS data in the Lane County Regional Land Information Database. See also Eugene-Springfield Metro Plan 1987 Update, Appendix C List of Exceptions, p. IV-17-33.

¹⁵ See maps in record “Employment Opportunity Area 4 Far East Springfield Area – Potential Study Area Evaluation”, ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; A & T maps 17-01-30-00, 17-01-32-30, 17-01-31-10, and 17-01-32-20. Slope percentages determined from NRCS data in the Lane County Regional Land Information Database

<ul style="list-style-type: none"> ○ 1701322002803, RR5, constrained by slopes >15%; ○ 1701322002401 bisected by Cedar Creek; ○ <u>1701322002601 (5 ac.)</u>, RR5, , flat topo, developed res use. ● One parcel TL300 is zoned Rural Commercial, 3.7 ac ● Upper Cedar Flats Rd. parcels constrained by slopes 15%-60%  <p>TL300 RC, 3.2 ac TL2900 RR5, 6.1 ac TL 2301, RR5, 8.4 ac</p> <p>TL 2800 RR5, 5.1 ac TL 2801, RR5 7.8 ac TL2601, RR5, 5 ac</p>	 
<p>Wallace Creek¹⁶</p> <ul style="list-style-type: none"> ● Within 1 mile of UGB ridgeline, 1-2 miles to UGB via roads, remote from Springfield, not adjacent to UGB ● Parcelized ● Rural Residential zoning RR-5, Panorama Rd. (8) upper Wallace Creek parcels contain 5.3 to 8.9 unconstrained acres, developed with dwellings <ul style="list-style-type: none"> ○ 18-02-11-00 505 (5 ac.) slopes ○ <u>18-02-11-00 1401 (5.8 ac.)</u>, slopes 12-45% ○ 18-02-11-00 1100 (5.8 ac.), slopes 12-45% ○ <u>18-02-11-00 1200 (6.2 ac.)</u>, slopes 12-45% ○ 18-02-12-00 500 (13.8 ac.) slopes ○ <u>18-02-12-00 603 (5.3 ac.)</u> ○ <u>18-02-12-00 604 (6.4 ac.)</u> ○ <u>18-02-12-00 605 (7.7 ac.)</u> ○ <u>18-02-12-00 606 (6.4 ac.)</u> ○ <u>18-02-12-00 615 (7.4 ac.)</u> ○ <u>18-02-12-00 619 (8.9 ac.)</u> 45% of lot is >12% slope ● Forested ● Steep slopes > 25%, some small flatter areas near the 	

¹⁶ See maps in record “Employment Opportunity Area 5/6 Wallis Creek & West Jasper/Jasper Bridge Area – Potential Study Area Evaluation”, ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; A & T maps 18-02-11-00, 18-02-12-00. Slope percentages determined from NRCS data in the Lane County Regional Land Information Database

junction of Wallace Creek Rd. and Weyerhaeuser Rd. and along upper Wallace Creek Rd.

- DOGAMI SLIDO mapped landslide data¹⁷ “Very High” landslide susceptibility: Wallace Creek Rd. area



Jasper Bridge A¹⁸

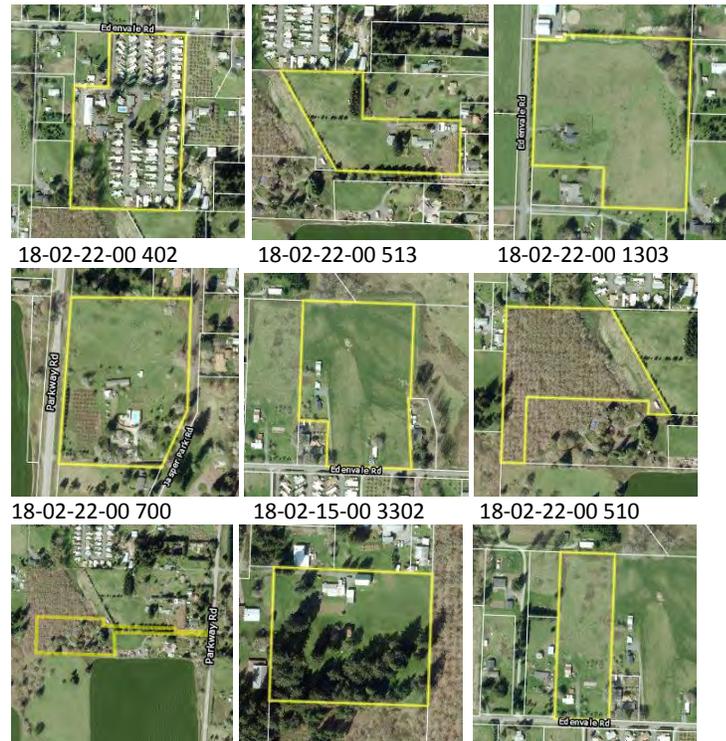
- Within 1-mile SW of UGB via Jasper Lowell Rd, west of Jasper-Lowell Road
- Separated from Springfield by Willamette River, resource land, and sloped land inside UGB
- Access via Jasper Lowell Road, and west across the Willamette River via Parkway Rd. and Edenvale Rd.
- Parcelized Rural Residential RR-5, mostly developed
- Parcels along river constrained by floodway, riparian resources



¹⁷ <http://www.oregongeology.org/slido/index.html> Statewide Landslide Information Layer for Oregon (SLIDO), Oregon Dept. of Geology and Mineral Industries, website accessed Feb. 29, 2016

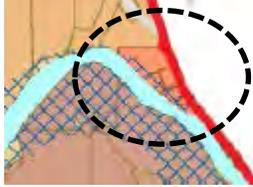
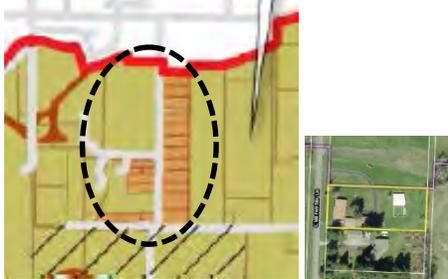
¹⁸ See maps in record “Employment Opportunity Area 5/6 Wallis Creek & West Jasper/Jasper Bridge Area – Potential Study Area Evaluation”, ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; A & T maps 18-02-15-00, 18-02-22-00, 18-02-23-00

- Note: large block of Class I and II prime farmland is located immediately west of this area
- 71-acre Jasper State Park is zoned Park and Recreation
- Exception land along east side Jasper Lowell Road and Hills Creek Road is parcelized 1-2 acre Rural Residential
- 1-acre or smaller parcels along Parkway Rd. ~115 feet x 350 feet
- 30-acre RR site is Union Pacific Railroad
- 13-acre RR site on Edenvale Rd. is a mobile home park
- RR-zoned Parcels >5-acres are developed with rural residential uses:
 - 18-02-15-00 3302 (9.6 ac.)
 - 18-02-15-00 3303 (5 ac.)
 - 18-02-22-00 2100 (8.9 ac.)
 - 18-02-22-00 1303 (7.3 ac.)
 - 18-02-22-00 402 (13 ac.) developed mobile home park
 - 18-02-22-00 1000 (5 ac.)
 - 18-02-22-00 510 (8.8 ac.)
 - 18-02-22-00 511 (6.8 ac.)
 - 18-02-22-00 513 (7.6 ac.)
 - 18-02-22-00 700 (7.1 ac.)
 - 18-02-23-00 2500 (5 ac.)
 - 18-02-23-00 2503 (5 ac.)
 - 18-02-23-00 2401 (6.5 ac.)
 - 18-02-23-00 2402 (6.2 ac.)
- 18-02-15-00 3400 (9.6 ac.) ODOT
- Floodplain, Class II soil area



<p>18-02-22-00 511</p>  <p>18-02-23-00 2500</p>	<p>18-02-22-00 1000</p> <p>18-02-15-00 3303</p>	
<p>Jasper Bridge B¹⁹</p> <ul style="list-style-type: none"> • 1.25 miles SW of UGB via Jasper Lowell Rd., not adjacent to UGB, separated from Springfield by distance and slopes. • Located east of Jasper Lowell Road, south of Hills Creek Road • Parcelized small lot Rural Residential between river and Jasper Lowell Road, 0.5 to 1 acre • RR-5 parcels along south side of Hills Creek Road • Two Rural Industrial-zoned parcels 18-02-23-00-01800 (20-acre) and 1801 (95 acres) located south of Hills Creek Road via Keeney Street/Osprey Lane are within 1.5 miles of UGB, developed with industrial uses, large ponds occupy 26% of the 95-acre Zola site, large wetland, slopes 10-70% 8% of at south end of site. These parcels are awkwardly shaped but may have additional development capacity if infrastructure and services could be provided: • <u>18-02-23-00 TL1800 17 unconstrained acres</u> is developed with industrial use (sawmills and planning mills), wetlands, irregular shape. Northern portion of site (n. of Keeney St.) has 6.4 unconstrained acres, developed with mill office. • <u>18-02-23-00 TL1801 33.3 unconstrained acres</u>, ponds, wetlands, slopes > 15% in south half of site, irregular shape. Northern portion of site (n. of Keeney St.) has 10.3 unconstrained acres. • Floodway, riparian resources, wetlands and slope constraints 		

¹⁹ See maps in record “Employment Opportunity Area 5/6 Wallis Creek & West Jasper/Jasper Bridge Area – Potential Study Area Evaluation”, ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; A & T map 18-02-23-00

<p>West Jasper/Mahogany²⁰</p> <ul style="list-style-type: none"> • Adjacent to UGB • Rural Residential zoning RR-5, all smaller than 5 acres • All parcels have floodway along the Willamette River • Willamette Greenway • Located between Union Pacific railroad line, Bob Straub Parkway southern terminus and Willamette River 	
<p>Clearwater²¹</p> <ul style="list-style-type: none"> • Adjacent to UGB • Located south of Jasper Rd. along Clearwater Lane • Abuts UGB, near City limits, east of 42nd Street • 1-acre rural residential lots are zoned RR, all smaller than 5 acres, and developed with homes; Hedlee Subdivision platted in 1972 with parcel sizes from 0.3 to 1.7 acres.²² • Land abutting the exception area to the south is Clearwater Park, zoned Park and Recreation 	
<p>Seavey Loop²³ A</p> <ul style="list-style-type: none"> • The lands abutting the UGB south of Springfield/Glenwood along Franklin Blvd. are primarily public lands comprising Interstate Highway 5 right of way, and Oregon Dept. of Parks and Recreation public park land. • Land between the Springfield UGB southern extent and the Seavey Loop A UGB Study Area Grouping (mapped on A & T maps 18-03-11-00, located along the I-5 onramp, McVay/Franklin intersection and Central Oregon & Pacific rail line (TL700) and 18-03-1010 designated Parks in the LRCP is primarily railroad right of way and thus is not suitable to meet Springfield’s employment land needs. • 0.5-0.7 acre exception parcels between UGB and the Franklin/Seavey Loop junction are zoned Rural Commercial and Rural Residential, developed commercial and residential uses, all smaller than 5 acres. • Willamette River Greenway and floodway east of Franklin 	  <p>Park (green) and Natural Resource-Mineral (gray) designated land south of Springfield UGB (UGB in red) in the vicinity of Seavey Loop A UGB Study Area Grouping;²⁴ showing</p>

²⁰ See maps in record “Employment Opportunity Area 7 Clearwater Area – Potential Study Area Evaluation”, ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; A & T map 18-02-10-00

²¹ See maps in record “Employment Opportunity Area 7 Clearwater Area – Potential Study Area Evaluation”, ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; A & T map 18-02-015-00.

²² Eugene-Springfield Metro Plan 1987 Update, Appendix C List of Exceptions, p. IV-11.

²³ See maps in record “Employment Opportunity Area 9/10 Seavey Loop/Goshen – Potential Study Area Evaluation”, ECONorthwest, November 2008 showing exception area parcel sizes and 25% > slope constraints; Map: College View-Seavey Loop Existing Lane County Zoning, and A & T maps of the study area 18-03-11-00, 18-03-11-30, 13-03-14-00

²⁴ Details from Lane County Plan Map Viewer website accessed Feb. 24, 2016: <http://lcmmaps.lanecounty.org/LaneCountyMaps/ZoneAndPlanMapsApp/index.html>. and as shown in the Official Lane County Plan Maps for Township 17 South, Range 1 West; Township 17 South, Range 2 West; Township 17 South, Range 3 West; Township 18 South, Range 2 West; Township 18 South, Range 3 West; see also maps and other documentation in the record describing the Willamette Confluence Area submitted by Chris Orsinger, President, Friends of Buford Park.

 <p>RC (orange) and RR (yellow) zoning floodway (cross-hatch)</p>	<p>OCPR rail line, I-5 corridor, McVay and Franklin Blvd. and Glass Bar Willamette River Greenway. Park and Natural Resource-Mineral lands are owned by public or non-profit conservation organizations</p>
<p>Seavey Loop B²⁵</p> <ul style="list-style-type: none"> • Strip of Rural Residential, Rural Commercial and Rural Industrial parcels south of Franklin/Seavey Loop junction along College View Road and west of Franklin/Seavey • Northern portion of strip between railroad and Franklin is within 1 mile of UGB • Parcelized 0.2 to 0.7 acre lots, Freeway Park Plat • Lot depth ranging from 90-200', lot width predominantly 100' • Developed with commercial and industrial uses that are expected to continue in planning period • N/S railroad line separates College View parcels from Franklin parcels • slopes 2-12%, DOGAMI mapped landslide hazards • Rural Industrial parcels along South Franklin and College View, 0.1-5.6 acres, are developed with commercial and industrial uses, lot depth 200'- 644' (Johnson Crushers developed parcels) <ul style="list-style-type: none"> ○ 18-03-11-30 3500 (5.6 ac.) developed industrial use ○ 18-03-11-30 3600 (5.5 ac.) developed industrial use ○ <u>18031400 400; (6 ac.), vacant RI &</u> ○ <u>18031400 900; (0.8 ac.) same owner (split plan des.)</u> 	 <p>County RR (yellow), RI (red) and RC (orange) zoning</p> <p>18-03-14-00 400</p> <p>Southern portion of 18-03-14-00 900</p>

²⁵ See maps in record "Employment Opportunity Area 9/10 Seavey Loop/Goshen – Potential Study Area Evaluation", ECONorthwest, November 2008 showing exception area parcel sizes and 25% > slope constraints; Map: College View-Seavey Loop Existing Lane County Zoning, and A & T maps of the study area 18-03-11-00, 18-03-11-30, 13-03-14-00

 <ul style="list-style-type: none"> The PF- designated area in the vicinity includes the southern portion of the 0.8 acre parcel at the south end of College View Rd. (18-03-14-00 900), the 62-acre US Government parcel (18-03-14-00 700) and adjacent parcels to the west that are developed with Interstate Highway 5 and BPA utilities. The sites owned by the Federal Government (Interstate Highway 5 right of way, and Bonneville Power Administration facilities), and Oregon Dept. of Transportation are unavailable and unsuitable for employment. The City’s analysis assumed the PF portion of 18-03-14-00 900 (approximately 0.5 ac.) may be developable in conjunction with the northern portion of the parcel and adjacent parcel 18-03-14-00 400. 	<p>has a split plan designation. PF-designated land shown in purple</p>
<p>Seavey Loop C</p> <ul style="list-style-type: none"> Exception parcels are 1.5-2 miles from UGB, not adjacent to UGB Rural Industrial and Rural Residential parcels, along Twin Buttes Road, developed with industrial and residential uses Slopes > 25% and > 15 % south of Twin Buttes Road, DOGAMI mapped landslide hazards Very restrictive Bonneville Power line easement along south side of Twin Buttes Road (mapped in yellow) - no structures permitted Middle Fork Willamette River floodway constraint Oxley Slough/Wild Hog Creek, floodway, hydric soils, Freeway access to south via Goshen and Highway 58 Larger 2-6 acre RR parcels on north side of Twin Buttes road may have development potential. 15-ac RR-5 parcel is developed with mobile home park 	



Access to I-5 from S. Franklin is via Hwy 99 and Hwy 58

- 18-03-14-40 502 (5.6 ac.), RR developed residential use
- 18-03-14-40 600 (2 ac.), RR and 700 (4 ac.), RI 701 (2.7 ac.), 800 (0.5 ac.), RI, 900 (0.5 ac.), RI developed industrial use: Walsh Trucking
- 18-03-14-40 300 (2.4 ac.), RR developed residential use, BPA and riparian constraint
- 18-03-14-40 508 5.2 constrained by BPA, slopes
- 18-03-14-40 200 (4.7) riparian constraint
- 18-03-13-30 1701 (15.2 ac.), RR, developed Dunker Mobile Home Park, BPA, floodway, wetland and riparian constraints
- 18-03-13-30 1702 (5 ac.), RR, Dunker, vacant
- 18-03-13-30 1600 (1.2 ac.), 1602 (1.1 ac.) and 1700 (2.8) Flynn = 5.1 ac.



18-03-13-30 1701



Floodway and BPA constraints



18-03-14-40 700



18-03-14-40 300



18-03-14-40 508



18-03-13-30 1702



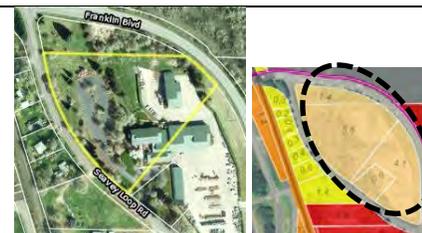
18-03-13-30 1700



18-03-14-40 502

Seavey Loop D

- Designated and zoned Rural Public Facility and developed with the Emerald People’s Utility District (EPUD) Headquarters. This use will continue through the planning period and thus the site is not suitable to meet Springfield’s employment land needs.

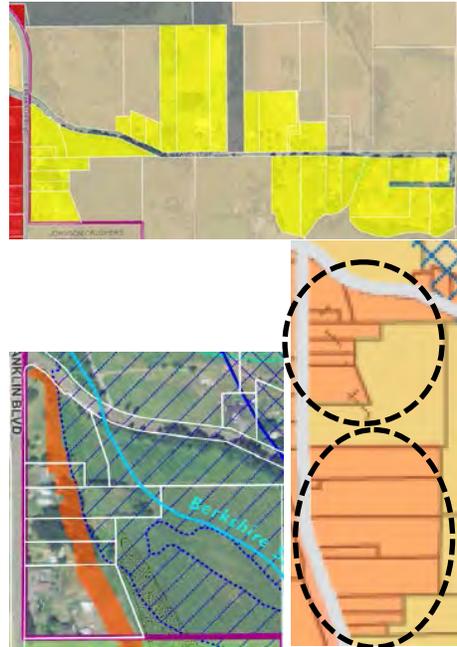


Seavey Loop E

- RR parcels north and south sides of Seavey Loop Rd., range in size from 0.65 to 9.75 acres, most are within the floodway and are developed with rural homes
- Adjacent to Willamette River Confluence Greenway area (Nature Conservancy and Friends of Buford Park lands)
- RI parcel Friends of Buford Park (TL 3802)
- RR-5 parcels south of Seavey Loop Rd, along Franklin range in size from 0.5 to 6.8 acres, mostly developed with rural homes and rural businesses:
 - 18-03-14-10 700 (6.5 ac.)
 - 18-03-14-10 900 (7.6 ac.)
 - 18-03-14-10 301 (6.9 ac.)
 - 18-03-14-10 1201 (6.8 ac.)
- Some slopes >15%
- Berkshire and Oxley Sloughs



- 18-03-11-30 3900, (3.1 ac.) slopes and Berkshire Slough
- 18-03-10-10 1600, (3.8 ac.) same owner



Seavey Loop F²⁶

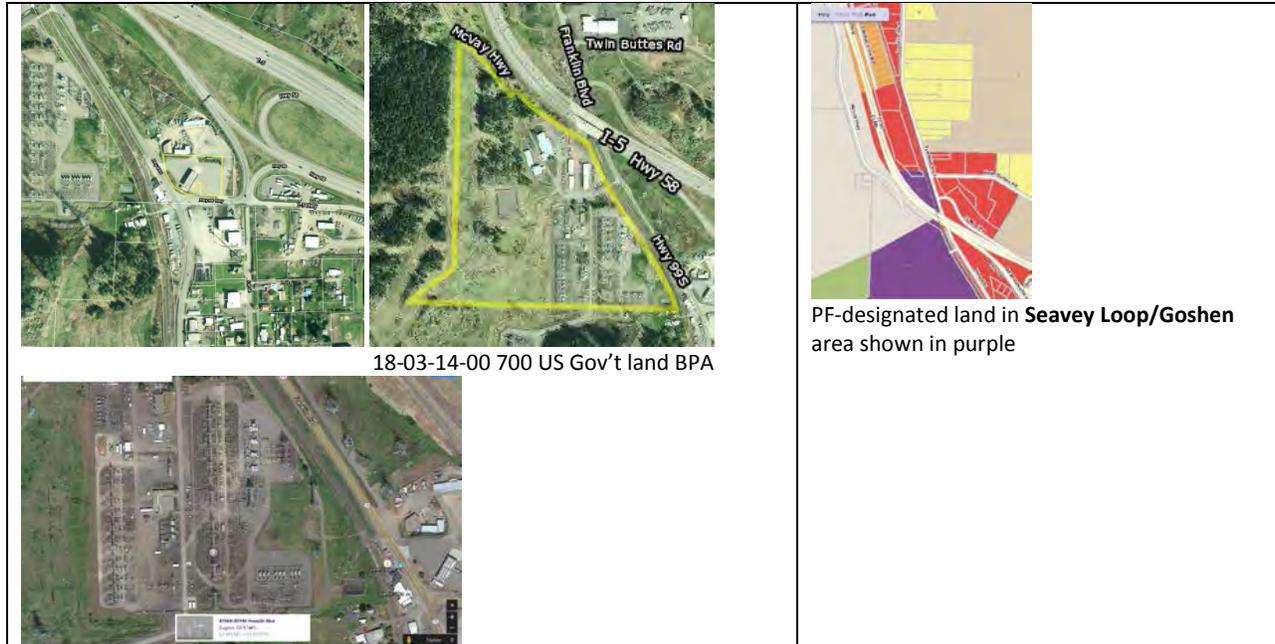
- RR-1 parcels south Seavey Loop Rd., east of Oxley Slough, are developed with homes at urban densities
- RR-5 parcels Starlite Plat
- Adjacent large resource land parcels to SE are Class II prime farmland, zoned for Exclusive Farm Use
- restrictive BPA easement restricts development of structures
- 18-03-13-30 RR-zoned parcels in Exception area F are all in the floodway
- 0 unconstrained 5 + acre parcels



²⁶ See maps in record A & T map 18-03-13-30, 18-03-13-23

	 <p>Floodway constraint (cross-hatch)</p>
<p>Seavey Loop/Goshen²⁷</p> <ul style="list-style-type: none"> • Lands located south of I-5 are included in Lane County's GREAT Plan Goal Exception: Glendora Tracts Rural Commercial developed interchange area • US Gov't Bonneville Power (BPA) Alvey Substation, development and restrictive easement –lands are designated and zoned Public Facility in LRCP. • Lands located south of I-5 and Highway 99 are included in Lane County's GREAT Plan Goal Exception. Community of Goshen exception land is located more than 1.75 miles south of UGB. • No parcels 5-acres or larger 	

²⁷ See maps in record A & T map 18-03-14-44, 18-03-14-44



The following summary in Table 3 identifies the general geographic groupings containing *potentially* suitable second priority parcels after excluding constrained portions of parcels and parcels smaller than 5 acres.

Table 3: Summary of Second Priority Exception Lands Parcels and Constraints Analysis - Unconstrained Parcels 5 Acres and Larger*					
Area	# of parcels 5+ ac adjacent to UGB	# of parcels 20+ ac *	# of parcels 5+ ac*	Parcels and unconstrained acres	Zoning
McKenzie View A	0	0	0		
McKenzie View B	0	0	2	17-02-19-00 3000; (6.7 ac) 17-02-19-00 3100; (5 ac.)	RR RR
Mohawk A	1	0	1	17-02-20-00 202; (5.3 ac)	RR
Mohawk B	0	0	4	17-02-17-00 1500; (5.7 ac., vacant) 17-02-17-00 1600; (5.4 ac.) 17-02-17-00 1309; (7 ac.) 17-02-17-00 1313; (18.3 Jasper Mt. Safe Center)	RI RR5 RR5 RR5
Mohawk C	0	0	6	17-02-08-00 0515; (8.7 ac.) 17-02-08-00 0516; (6.7 ac.) 17-02-08-00 0517; (6 ac.) 17-02-08-00 0600; (5.8 ac.) 17-02-08-00 0700; (5.7 ac.) 17-02-08-00 0701; (5.5 ac.)	RR5 RR5 RR5 RR5 RR5 RR5

				18-02-12-00 605; (7.7 ac.) 18-02-12-00 606; (6.4 ac.) 18-02-12-00 615; (7.4 ac.) 18-02-12-00 619; (8.9 ac.)	
Jasper Bridge A	0	0	14	all have homes and are surrounded by smaller residential parcels 18-02-15-00 3302; (9.6 ac.) 18-02-15-00 3303; (5 ac.) 18-02-22-00 2100; (8.9 ac.) 18-02-22-00 1303; (7.3 ac.) 18-02-22-00 402; (13 ac.) developed mobile home park 18-02-22-00 1000; (5 ac.) 18-02-22-00 510; (8.8 ac.) 18-02-22-00 511; (6.8 ac.) 18-02-22-00 513; (7.6 ac.) 18-02-22-00 700; (7.1 ac.) 18-02-23-00 2500; (5 ac.) 18-02-23-00 2503; (5 ac.) 18-02-23-00 2401; (6.5 ac.) 18-02-23-00 2402; (6.2 ac.)	
Jasper Bridge B	0	1** PREDEV	1** PREDEV	18-02-23-00 TL1800; <u>17 acres</u> is developed with industrial use that likely will continue through planning period. Portion of parcel n. of Keeney Street may have development potential but it abuts rural residential uses along Hills Creek Rd. 18-02-23-00 1801; <u>33.3 acres</u> . 10 ac. portion of parcel n. of Keeney Street may have development potential but it abuts rural residential uses along Hills Creek Rd.	RI RI
West Jasper/ Mahogany	0	0	0		
Clearwater	0	0	0		
Seavey Loop A	0	0	0		
Seavey Loop B	0	0	1	Developed industrial use (Johnson Crushers) will likely continue through planning period. <u>18031400 400; (6 ac.), vacant</u>	RI
Seavey Loop C	0	0	3	18-03-14-40 502; (5.6 ac.) 18-03-13-30 1702; (5 ac.) vacant 18-03-13-30 1600, 1602, 1700; (5.1 ac. combined)	RR
Seavey Loop D	0	0	0	Developed Rural Public Facility (EPUD)	RPF
Seavey Loop E	0	0	4	18-03-14-10 700; (6.5 ac.) 18-03-14-10 900; (7.6 ac.) 18-03-14-10 301; (6.9 ac.) 18-03-14-10 1201; (6.8 ac.)	RI RR

Seavey Loop F	0	0	0	RR-1 parcels south Seavey Loop Rd., east of Oxley Slough, are developed with residential use at urban densities RR-5 parcels Starlite Plat All in floodway	RR
Seavey Loop/Goshen	0	0	0		

* No deduction for existing residential development on parcels was made by City

** PREDEV= Potentially redevelopable rural industrial parcel considered by City. Land in the UGB Study Area with redevelopment potential is land that is classified as “developed” that may redevelop during the planning period to increase employment capacity in Springfield, consistent with the Goal 9 definition of redevelopment. As described in the preceding text and graphics, the City identified and evaluated several developed exception land sites larger than 5 acres on a site-by-site basis and determined that except where identified in Table 3, these sites are unlikely to redevelop over the 20-year planning period to meet Springfield’s specific employment land needs for sites larger than 5 acres. The City’s reasoning for this evaluation of alternatives was based on the presence of existing businesses or residential development on the site that are expected to continue to use the site for the planning period; physical absolute constraints that diminish the amount and site configuration of potentially redevelopable areas; and parcel sizes and configurations that result in potentially redevelopable areas smaller than five acres.

As shown in Table 3, the City’s initial screening identified a total of (72) second priority exception land parcels* 5 acres or larger in the vicinity of the UGB that *may* have potential to satisfy the identified need deficiency based solely on their parcel acreage and lack of absolute development constraints. These parcels are located within 13 study area groupings and within 8 different geographic areas.

As shown in Table 3, the City’s initial screening identified (3) parcels 5 acres or larger, a total of 18.6 acres of second priority exception land are located adjacent to the UGB. These parcels are located within 2 study area groupings and within 2 different geographic areas. The adjacent parcels are not contiguous to one another, and one of the parcels is sloped 12-15%, too steep for industrial uses and commercial mixed-use development.

EXCLUDE SECOND PRIORITY EXCEPTION LANDS LACKING THE SPECIFIED CHARACTERISTICS TO MEET THE IDENTIFIED EMPLOYMENT LAND NEED

The next step in the process excluded the second priority lands that are *not* potentially suitable to provide unconstrained parcels larger than 5 acres to satisfy the identified employment land need deficiency. The City’s reasoning at this stage in the analysis was based on parcel size, ownership and presence of absolute development constraints on a parcel or grouping of adjacent parcels under single ownership.

OAR 660-024-0060 (1)(e)

“For purposes of this rule, the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under section (5) of this rule, as well as other provisions of law applicable in determining whether land is buildable or suitable.”[emphasis added]

OAR660-024-0060(5)

*“If a local government has specified characteristics such as parcel size, topography, or proximity that are necessary for land to be suitable for an identified need, the local government may limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298.”
[emphasis added]*

Identification of Potentially Suitable Exception and Non-resource Land. As previously explained in the City’s findings under Goal 9, the CIBL/EOA ²⁸ provides a determination of the amount and type of land needed in the UGB amendment to accommodate Springfield’s employment land needs for 2010-2030, and OAR 660-009-0005 states that “the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under Section (5), as wells as other provisions of law applicable in determining whether land is buildable or suitable.”

To identify *potentially* suitable exception land sites to meet employment land needs, the City applied the following factors²⁹ (from an outline provided by DLCD Staff Gordon Howard) to exclude or include exception lands in the next stage of the evaluation process:

- Exclude lands that are not buildable³⁰
- Exclude lands based upon specific land needs (197.298(3)(a))

In the previous step in the alternatives analysis, the City identified exception land parcels that could *potentially* be suitable to meet the City’s need for employment land sites larger than 5 acres and sites larger than 20 acres. This step excluded parcels or portions of parcels with absolute development constraints, and excluded exception land with pre-existing development and parcelization patterns that limit the suitability of lands for use as future employment sites. For example, the City considered that 5.5 and 5.6 acre parcels in Preliminary Study Area grouping Seavey Loop B that are developed with the Johnson Crushers International plant to be developed with an industrial use expected to continue in the

²⁸ CIBL/EOA Table S-5, page ix-x.

³⁰ “Buildable” is a Goal 10 term. It is the City’s position that OAR 660-024-0060 (1) requires the City to consider whether sites are “suitable” at this “buildable” stage in the evaluation process.

planning period thus not suitable to meet the City's need for employment land sites larger than 5 acres and sites larger than 20 acres in the planning period.

For the purpose of evaluating second priority exception land, the City identified the following criteria to be applied equally to all parcels within the Preliminary Study Area — in order of their priority under ORS 197.298— to determine whether a parcel of land or group of parcels is potentially suitable to meet employment land needs.

Parcel size is a key factor because Springfield's land need in the UGB expansion is for sites larger than 5 acres, with some needed sites larger than 20 acres. The City identified parcels 5 acres or larger as potentially suitable to meet employment land needs, and excluded parcels or portions of parcels less than 5 acres from further analysis. For the purpose of this step in the analysis, the City did not deduct for existing residential development on parcels 5 acres or larger.

Topography is a key factor in determining suitability because Springfield's land need is for industrial and commercial mixed use sites with relatively flat topography (less than 5% slope and less than 7% slope).

As explained in the City's findings under Goal 9 and in the CIBL/EOA, distance relative to the City and to existing urban infrastructure systems is a key factor in determining employment land suitability because Springfield's identified land need is for industrial and commercial mixed use sites that provide reasonable access and travel times to major transportation corridors and reasonable service connections to public water and wastewater conveyance systems, public transit service, and public stormwater and wastewater management systems, facilities and services. Employment sites must also have reasonable connection to electricity and telecommunications systems.

As previously explained, the City applied the following factors as absolute development constraints to providing urban services to employment land:

- Portions of tax lots with slopes > 15%
- Portions of tax lots comprising inventoried wetlands
- Portions of tax lots within the floodway
- Portions of tax lots comprising riparian resource areas

The City excluded portions of parcels constrained by floodway, inventoried wetlands, and riparian resources when it analyzed the suitable acreage of a parcel or group of parcels. As these factors preclude or place limitations on whether a parcel is buildable for urban development, they subsequently preclude or place limitations on the suitability of land to accommodate the need deficiency determined under OAR 660-024-0050.

For the initial screening of land, the City identified parcels or portions of parcels with slopes 15% or less as *potentially* suitable to meet employment land needs, and excluded parcels or portions of parcels with slopes greater than 15% from further analysis.

The City's findings describe or map all of the alternative areas evaluated in the boundary location alternatives analysis as required by OAR 660-024-0060(6). The City's analysis involves more than one parcel or area within a particular priority category in ORS 197.298 for which circumstances are the same. As permitted under OAR 660-024-0060(6), the City is allowed to consider and evaluate those parcels or areas as a single group. The City analyzed parcels within a priority category by geographic groupings as permitted under OAR 660-024-0060(6).

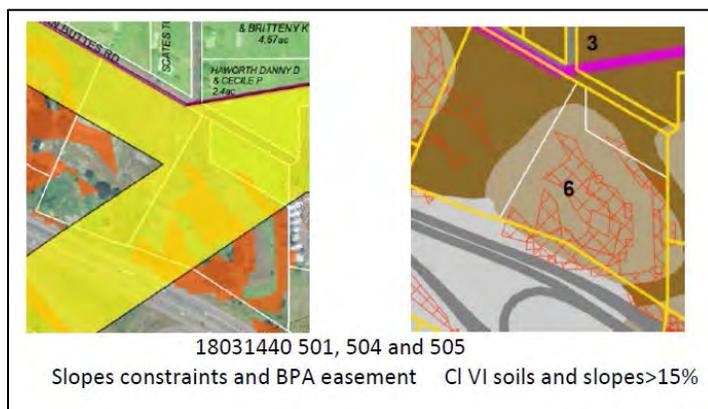
In addition to the summary data compiled in Map 1, Table 2 and Table 3, the record includes maps, acreage calculations and other evidence used as factual basis for the City's uniform and consistent evaluation of parcelization, slopes, floodway, inventoried wetlands and riparian resources on all exception parcels in the preliminary study area. This evidence is relevant to justify the City's identification of *potentially* suitable second priority exception land parcels and its exclusion of unsuitable second priority exception land parcels from further analysis.

ORS 197.298 (1)(b):

"Second priority may include resource land that is completely surrounded by exception areas unless such resource land is high-value farmland as described in ORS [215.710 \(High-value farmland description for ORS 215.705\)](#)."

To complete its evaluation of second priority land, the City examined the study area to identify resource land areas that are completely surrounded by exception areas unless such resource land is high-value farmland as described in ORS 215.710 (High-value farmland description for ORS 215.705). One area meeting this description exists within the UGB Study Area.

One tract of resource land (zoned EFU) in the Seavey Loop area meets the criteria for second priority: 18031440 tax lots 501, 504 and 506. As shown in the figure below, this tract is constrained by slopes and very restrictive BPA easements and was excluded from consideration.



EXCLUDE LANDS THAT ARE NOT BUILDABLE (SUITABLE), BASED UPON SPECIFIC LAND NEEDS [ORS 197.298(3)(a)]

This section of the report provides explanation and evidence to support the City's findings addressing ORS 197.298(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060(1)(c), OAR 660-024-0060(1)(d), OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR 660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c).

As described in the preceding text and graphics, the City excluded exception land parcels less than 5 acres in size and portions of parcels with absolute development constraints (slopes >15%, floodway, inventoried wetlands, waterways, and riparian resources) when it analyzed the potentially suitable acreage of each exception land parcel or group of parcels, as permitted under OAR 660-024-0060(5).

OAR 660-024-0060(1)(e)

“For purposes of this rule, the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under section (5) of this rule, as well as other provisions of law applicable in determining whether land is buildable or suitable.”

OAR 660-024-0060(5)

“If a local government has specified characteristics such as parcel size, topography, or proximity that are necessary for land to be suitable for an identified need, the local government may limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298.”

As described and shown in the preceding text and graphics, and as verified by supporting evidence (parcel maps data and GIS maps) in the record, the City applied characteristics of parcel size, topography, and absolute development constraints (floodway, wetlands, riparian resources) to all second priority exception land parcels in the UGB Study Area to identify potentially suitable land to meet the employment land need, when it conducted the boundary location alternatives analysis and applied ORS 197.298. [OAR 660-024-0060(1)(e) and OAR 660-024-0060 (5)] .

These steps excluded the McKenzie View A, West Jasper/Mahogany, Clearwater, Seavey Loop A, D, F, and Seavey Loop/Goshen exception parcels from further consideration.

After excluding the McKenzie View A, West Jasper/Mahogany, Clearwater, Seavey Loop A, D, F, and Seavey Loop/Goshen exception parcels, the City's analysis of parcel size and absolute development constraints identified the seven remaining exception area geographic groupings that contain *potentially* suitable land. These areas were identified for additional analysis study to determine serviceability and

suitability to determine whether exception lands in the vicinity fo the UGB can “reasonably accommodate” the identified employment land need.

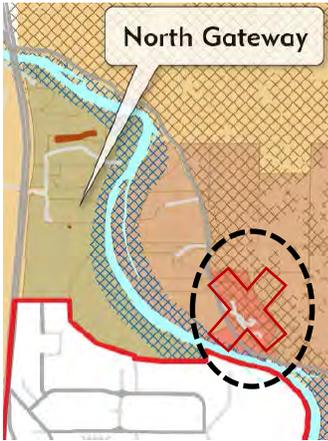
No exception area will provide a vacant candidate site with 20 or more unconstrained acres to meet Springfield’s industrial and commercial mixed-use employment land needs.

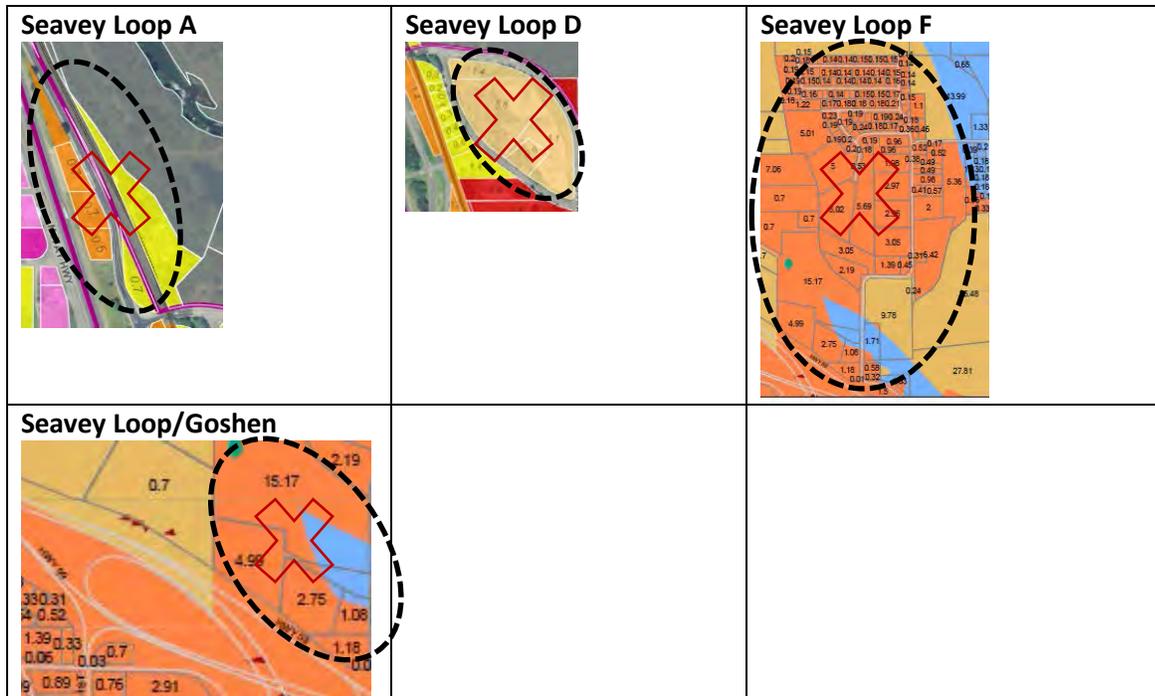
The City’s need for 186 acres to accommodate sites 20 acres and larger cannot be met by adding exception lands to the UGB.

The City identified the exception land parcels listed in Table 3, Summary of Second Priority Exception and Non-Resource Parcels and Constraints Analysis as candidate lands for additional analysis to determine serviceability and suitability to meet the need for 37 acres to accommodate smaller 5-20 acre sites.

The McKenzie View A, West Jasper/Mahogany, Clearwater, Seavey Loop A, D, F and Seavey Loop/Goshen exception parcels with less than 5 unconstrained acres were excluded from further analysis.

Table 4: Second priority exception parcels excluded based upon specific land needs [ORS 197.298(3)(a)]

McKenzie View A	West Jasper/Mahogany	Clearwater
		



IDENTIFY SECOND PRIORITY EXCEPTION LANDS WITH THE SPECIFIED CHARACTERISTICS TO MEET THE IDENTIFIED EMPLOYMENT LAND NEED TO INCLUDE IN THE UGB

In the next step, the City conducted a public facilities and services analysis to determine whether the *potentially* suitable exception parcels identified in the previous step could reasonably be provided with the public water, sewer, stormwater and transportation facilities needed to serve industrial and commercial mixed use employment uses within the 2010-2030 planning period and thus be considered suitable candidate lands to accommodate the identified employment land need deficiency determined under OAR 660-024-0050.

The following section of this report provides explanation of the City’s rationale and evaluation criteria for comparing serviceability and suitability of candidate lands.

The following section of this report provides substantial evidence to support the City’s findings under Goals 11 and 12.

OAR 660-024-0010(8) Definitions states:

“Suitable vacant and developed land” describes land for employment opportunities, and has the same meaning as provided in OAR 660-009-0005 section (1) for “developed land,” section (12) for “suitable,” and section (14) for “vacant land.”

OAR 660-024-0040(7) states:

“The determination of 20-year land needs for transportation and public facilities for an urban area must comply with applicable requirements of Goals 11 and 12, rules in OAR chapter 660, divisions 11 and 12, and public facilities requirements in ORS 197.712 and 197.768.”

For land to be “suitable” for industrial and other employment use under OAR 660-009-0005(12) it must be “serviceable.” OAR 660-009-0005(9) states that “‘Serviceable’ means a city or county has determined that public facilities and transportation facilities, as defined by OAR chapter 660, division 11 and division 12, currently have adequate capacity for development planned in the service area where the site is located or can be upgraded to have adequate capacity within the 20-year planning period.”

OAR 660-011-0005(5) defines “Public Facility”:

“A public facility includes water, sewer, and transportation facilities, but does not include buildings, structures or equipment incidental to the direct operation of those facilities.”

As explained in greater depth in the City’s findings under Goal 11, OAR Division 11 requires public facilities planning:

“to help assure that urban development in such urban growth boundaries is guided and supported by types and levels of urban facilities and services appropriate for the needs and requirements of the urban areas to be serviced, and that those facilities and services are provided in a timely, orderly and efficient arrangement, as required by Goal 11.”[OAR 660-011-0000]

Goal 11 requires public facilities to be planned to support types and levels of urban facilities and services appropriate for Springfield’s needs and requirements, consistent with the comprehensive plan. Springfield’s need is for the types and levels of public facilities and services appropriate and necessary to support the needs of urban industrial and commercial uses generally and manufacturing and office employment sites specifically.³¹ Goal 11 requires public facilities and services to be provided “*in a timely, orderly and efficient arrangement.*” Goal 14 requires cities to evaluate changes to their UGB considering “*orderly and economic provision of public facilities and services.*”

As explained in greater detail in the City’s findings under Goal 11, the City relied primarily on the 2035 TSP, the policies and findings of the acknowledged Metro Plan Public Facilities and Services Element, the *Eugene-Springfield Metropolitan Area Public Facilities and Services Plan*, the Springfield Wastewater and Stormwater facilities master plans, and Springfield Utility Board facilities plans as the primary data sources to assess and compare the public facilities needs to serve candidate expansion lands in a timely, orderly, and efficient arrangement. The City relied primarily on those same data sources and interviews with County and City planning staff when it determined that public facilities and transportation facilities

³¹ Springfield’s Target Industries are listed and explained in detail in the CIBL/EOA.

— as defined by OAR chapter 660, division 11 — currently have adequate capacity for development planned in the service area where the candidate UGB expansion site is located or can be upgraded to have adequate capacity within the 20-year planning period to serve candidate expansion lands in a timely, orderly and efficient arrangement consistent with OAR chapter 660, divisions 11. The City did this by conducting an iterative series of meetings with City and service provider agency engineering and transportation planning staff over a multi-year period to examine the nearest location and capacity of existing and planned public facilities in the vicinity of a candidate parcel or grouping of parcels and by considering possible ways and means of connecting candidate lands to facilities and services in accord with applicable provisions of the law.

OAR 660-012-0005(30) defines “Transportation Facilities”:

“Transportation Facilities means any physical facility that moves or assists in the movement of people or goods including facilities identified in OAR 660-012-0020 but excluding electricity, sewage and water systems.”

OAR 660-012-0020 states “TSPs shall establish a coordinated network of transportation facilities adequate to serve state, regional and local transportation needs;” and lists the elements that must be included in the required Transportation Systems Plans (TSPs). TSPs must establish “a system of planned transportation facilities, services and major improvements. The system shall include a description of the type or functional classification of planned facilities and services and their planned capacities and performance standards;” [OAR 660-012-0020 (3)(b)]. The TSP must describe the “location of planned facilities, services and major improvements, establishing the general corridor within which the facilities, services or improvements may be sited. This shall include a map showing the general location of proposed transportation improvements, a description of facility parameters such as minimum and maximum road right of way width and the number and size of lanes, and any other additional description that is appropriate;” [OAR 660-012-0020 (3)(c)].

OAR 660-012-0025(1)

“Except as provided in section (3) of this rule, adoption of a TSP shall constitute the land use decision regarding the need for transportation facilities, services and major improvements and their function, mode, and general location.”

OAR 660-012-0030 Determination of Transportation Needs

(1) The TSP shall identify transportation needs relevant to the planning area and the scale of the transportation network being planned including:

- (a) State, regional, and local transportation needs;*
- (b) Needs of the transportation disadvantaged;*
- (c) Needs for movement of goods and services to support industrial and commercial development planned for pursuant to OAR chapter 660, division 9 and Goal 9 (Economic Development).*

The City properly relied on the acknowledged 2035 Springfield TSP, the Lane County TSP and the Central Lane MPO RTP (as described in the City’s findings under Goal 12) as the primary data sources to assess and compare the need for transportation facilities, services and major improvements that would be associated with the urbanization of candidate expansion lands when it conducted the UGB Alternatives Analysis. The TSPs describe the location of existing and planned transportation facilities, services and major improvements, establishing the general corridor within which the facilities, services or improvements may be sited. The City relied primarily on those same data sources and interviews with ODOT, County, City and Lane Transit District transportation planning staff when it determined that public facilities and transportation facilities — as defined by OAR chapter 660, division 12 — currently have adequate capacity for development planned in the service area where the candidate UGB expansion site is located or can be upgraded to have adequate capacity within the 20-year planning period consistent with OAR chapter 660, division 12.

Requirements under OAR chapter 660, division must be considered at this stage in the UGB Alternatives Analysis to ensure that the amendment of the comprehensive plan to add urbanizable lands to the UGB is supported by adequate planned transportation facilities in a manner that is consistent with applicable transportation planning requirements in OAR chapter 660, division 12. The City is expanding the UGB to designate suitable land for industrial and commercial development, therefore suitable candidate lands added to the UGB must provide for the relevant transportation needs: movement of goods and services to support industrial and commercial development planned for pursuant to OAR chapter 660, division 9 and Goal 9 (Economic Development);[OAR 660-012-0030 (1)(c)] and movement of workforce employees to and from the workplace, including needs of the transportation disadvantaged. The City seeks to add employment sites that are reasonably accessible to Interstate Highway 5 via designated freight routes to meet site needs of target industries. The City also seeks to add employment sites in locations that are accessible or can reasonably be made accessible via transit.

OAR 660-012-0005(22)

“Planning Period” means the twenty-year period beginning with the date of adoption of a TSP to meet the requirements of this rule.”

It should be noted that the 2030 Plan planning period is 2010-2030. The Springfield TSP planning period extends to the year 2035.

OAR 660-012-0005(24)

“Reasonably direct” means either a route that does not deviate unnecessarily from a straight line or a route that does not involve a significant amount of out-of-direction travel for likely users.”

The definition of "reasonably direct" is relevant and appropriate to the UGB Alternatives Analysis because "reasonably direct" travel routes are important location factors for Springfield's target manufacturing uses.³²

OAR 660-012-0005(32)

"Transportation Needs" means estimates of the movement of people and goods consistent with acknowledged comprehensive plan and the requirements of this rule. Needs are typically based on projections of future travel demand resulting from a continuation of current trends as modified by policy objectives, including those expressed in Goal 12 and this rule, especially those for avoiding principal reliance on any one mode of transportation."

To assess the types and levels of transportation needs associated with the industrial and commercial employment land UGB expansion, and to compare the relative advantages and disadvantages of candidate sites, the City assumed that those needs would be a continuation of current trends for similar industrial and commercial office employment uses as modified by policy objectives in the TSP, and applicable 2030 Comprehensive Plan Economic and Urbanization Element policies.

The transportation system must "minimize adverse economic, social, environmental and energy consequences; [OAR 660-012-0035(3)(c)], "minimize conflicts and facilitate connections between modes of transportation;" and "avoid principal reliance on any one mode of transportation by increasing transportation choices to reduce principal reliance on the automobile."

OAR 660-012-0035 Evaluation and Selection of Transportation System Alternatives

Requirements under OAR chapter 660, division must be considered at this stage in the UGB Alternatives Analysis to ensure that the amendment of the comprehensive plan to add urbanizable lands to the UGB is supported by adequate planned transportation facilities in a manner that is consistent with applicable transportation planning requirements in OAR chapter 660, division 12. Just as the TSP must "evaluate potential impacts of system alternatives that can reasonably be expected to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology;" [OAR 660-012-0035] the City's UGB study carefully examined and compared alternative candidate growth areas to determine which alternative(s) can reasonably be expected to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology."

The transportation system must "support urban development by providing types and levels of transportation facilities and services appropriate to serve the land uses identified in the acknowledged comprehensive plan." [OAR 660-012-0035(3)(a)]. The City is expanding the UGB to designate suitable, serviceable land for industrial and commercial development, therefore suitable candidate lands added to the UGB must be located where the relevant transportation needs associated with those needed

³² See TadZo report

employment land uses can reasonably be provided within the planning period: movement of goods and services to support the industrial and commercial employment development planned for pursuant to OAR chapter 660, division 9 and Goal 9 (Economic Development), and movement of workforce employees to and from the workplace, including needs of the transportation disadvantaged. [OAR 660-012-0030(1)(b)]

The City evaluated alternative candidate lands to consider the advantages and disadvantages of moving goods and service, workforce employees, including needs of the transportation disadvantaged via the existing and planned transportation system to minimize adverse economic, social, environmental and energy consequences. [OAR 660-012-0035(3)(c)]. The City accomplished this by measuring and comparing distance to candidate sites via existing and planned routes.

OAR 660-012-0005(41) Vehicle Miles of Travel (VMT)

“Vehicle Miles of Travel (VMT): means automobile vehicle miles of travel. Automobiles, for purposes of this definition, include automobiles, light trucks, and other similar vehicles used for movement of people. The definition does not include buses, heavy trucks and trips that involve commercial movement of goods. VMT includes trips with an origin and a destination within the MPO boundary and excludes pass through trips (i.e., trips with a beginning and end point outside of the MPO) and external trips (i.e., trips with a beginning or end point outside of the MPO boundary). VMT is estimated prospectively through the use of metropolitan area transportation models.”

To address OAR 660-012-0005 (41) *“Vehicle Miles of Travel (VMT)*, the City considered the VMT advantages and disadvantages of moving goods and service, workforce employees, including needs of the transportation disadvantaged via the existing and planned transportation system [OAR 660-012-0005(41)]when it evaluated alternative candidate lands. The City accomplished this by measuring and compared distance to candidate sites via existing and planned routes, assuming build out of the planned transportation system. This is germane to the evaluation of serviceability because urban transit service is required for a city of Springfield’s size, to ensure that new jobs can be accessible to that transportation disadvantaged and as an important means to reducing VMT. Thus, ability to reasonably provide public transit service to new urban areas is a critical and necessary component of serviceability in this case. The City, in consultation with Lane Transit District staff, considered whether extending public transit service to candidate expansion areas can reasonably be expected to be feasible to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology.

To further evaluate potentially suitable exception and land sites to meet employment land needs, the City applied the following factors (from an outline provided by DLCD Staff Gordon Howard) to exclude or include exception in the next stage of the evaluation process:

- Exclude lands that are not buildable³³

³³ “Buildable” is a Goal 10 term. It is the City’s position that OAR 660-024-0060 (1) requires the City to consider whether sites are “suitable” at this “buildable” stage in the evaluation process.

- Exclude lands based upon specific land needs (197.298(3)(a));
- Exclude lands based upon inability to reasonably provide urban services due to physical constraints (197.298(3)(b));
- Include lower priority lands needed to include or provide services to urban reserve lands (197.298(3)(c));
- Exclude lands based upon analysis of comparative ESEE consequences (Goal 14, Boundary Location, Factor 3);
- Exclude lands based upon analysis of compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4)

OAR 660-024-0060 (1)(e)

“For purposes of this rule, the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under section (5) of this rule, as well as other provisions of law applicable in determining whether land is buildable or suitable.”

OAR 660-024-0060(5)

“If a local government has specified characteristics such as parcel size, topography, or proximity that are necessary for land to be suitable for an identified need, the local government may limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298.”

For the public facility suitability analysis, the City assumed that the type, size and service levels of public water, wastewater, stormwater facilities and transportation systems needed to serve candidate employment expansion areas are the type, size and service levels needed to serve the target industries identified in the CIBL/EOA, as identified as summarized in this report in the City’s findings under Goal 9; as supported by the evidence in the record; and as required under applicable federal, state, regional and local plan policies and environmental permits. Target industries require and rely upon specific types, sizes and service levels of public water, wastewater, stormwater facilities and transportation systems to conduct their operations — including but not limited to necessary and typical proximity to existing public facilities, transportation systems and services. Therefore the City analyzed proximity to existing facilities and systems when it conducted the public facilities analysis summarized in Table 4 Public Facilities Analysis, and excluded lands from further consideration based on necessary and typical proximity when it conducted the boundary location alternatives analysis.

The City properly considered the employment land suitability characteristics regarding the type, size and service levels of public water, wastewater, stormwater facilities and transportation systems needed to serve candidate employment expansion areas, based on the characteristics of needed sites determined in the Economic Opportunities Analysis and supporting evidence in the record.

For the next steps, in the analysis, the City analyzed general geographic groupings of parcels within each priority category as permitted under OAR 660-024-0060(6).

It should be noted that two geographic areas (Mohawk and Wallace Creek) contain second priority exception parcels and third priority marginal parcels. These are discussed separately in order of priority. General geographic groupings comprising disparately located parcels were grouped into subgroups based on their location, relative proximity to the UGB, and relative proximity to potential service connections. For example, Mohawk A, B and C parcels are located increasingly distant from the UGB, with A being the closest.

EXCLUDE LANDS THAT CANNOT REASONABLY BE PROVIDED WITH URBAN INFRASTRUCTURE AND SERVICES DUE TO PHYSICAL CONSTRAINTS [ORS 197.298(3)(b)].

This section of the report provides explanation and evidence to support the City's findings addressing ORS 197.298(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060(1)(c), OAR 660-024-0060(1)(d), OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR 660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c).

As previously explained in the City's findings under Goal 9, the CIBL/EOA³⁴ provides a determination of the amount and type of land needed in the UGB amendment to accommodate Springfield's employment land needs for 2010-2030, and OAR 660-009-0005 states that "the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under Section (5), as well as other provisions of law applicable in determining whether land is buildable or suitable." [emphasis added]

OAR 660-009-0005(12) states that "'[s]uitable' means serviceable land designated for industrial or other employment use that provides, or can be expected to provide the appropriate site characteristics for the proposed use."³⁵ [emphasis added]

OAR 660-009-0005(2)

"Development Constraints" means factors that temporarily or permanently limit or prevent the use of land for economic development. Development constraints include, but are not limited to, wetlands, environmentally sensitive areas such as habitat,

³⁴ CIBL/EOA Table S-5, page ix.

³⁵ The Goal 14 rule at OAR 660-024-0010(8) states: "'[s]uitable vacant and developed land' describes land for employment opportunities and has the same meaning as provided in OAR 660-009-0005 section...(12) for 'suitable.'"

environmental contamination, slope, topography, cultural and archeological resources, infrastructure deficiencies, parcel fragmentation, or natural hazard areas. [emphasis added]

OAR 660-009-0005(4)

"Locational Factors" means market factors that affect where a particular type of industrial or other employment use will locate. Locational factors include, but are not limited to, proximity to raw materials, supplies, labor, services, markets, or educational institutions; access to transportation and freight facilities such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes; and workforce factors (e.g., skill level, education, age distribution)." [emphasis added]

OAR 660-009-0005(11)

"Site Characteristics" means the attributes of a site necessary for a particular industrial or other employment use to operate. Site characteristics include, but are not limited to, a minimum acreage or site configuration including shape and topography, visibility, specific types or levels of public facilities, services or energy infrastructure, or proximity to a particular transportation or freight facility such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes." [emphasis added]

Availability of urban infrastructure and public facilities is identified as a necessary employment land site characteristic in the CIBL/EOA, thus serviceability is a critical site characteristic for determining whether a particular parcel of land is suitable to meet the City's specified employment needs. Specific infrastructure needs for Springfield's target industries are summarized on page 161 and further explained in CIBL/EOA Chapter on pages 82-95 of the CIBL/EOA Characteristics of Needed Sites.

OAR 660-024-0060(8)

OAR 660-024-0060(8) requires evaluation and comparison of the relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services needed to urbanize alternative boundary locations. Part of the OAR 660-024-0060(8) analysis requires the City to determine which lands cannot reasonably be provided with urban services due to physical constraints [ORS 197.298(3)(b)]. To conduct the next step of the boundary alternatives analysis, the City excluded lands that cannot reasonably be provided with public infrastructure, facilities and services due to physical constraints [ORS 197.298(3)(b)]. The City identified the following factors as significant physical constraints to providing the public services necessary to develop employment land sites. As these factors preclude or place limitations on serviceability, they subsequently preclude or place limitations on the suitability of land to accommodate the need deficiency determined under OAR 660-024-0050:

- Physical separation from existing water and wastewater service mains by the McKenzie or Willamette River

- Physical separation by distance to existing or planned public facilities, service connections and service areas
- Slopes as identified in the CIBL/EOA: 5% or less for Manufacturing, 7% or less for High Tech and Campus Manufacturing
- Topographic, geographic or geological constraints that physically preclude or significantly impede the feasible construction of functioning gravity flow systems.
- Topographic, geographic or geological constraints that physically preclude or significantly impede the feasible connection of employment sites to Federal or State truck routes. As identified in the CIBL/EOA, “most businesses in Springfield typically locate within one mile of Interstate Highway 5 or ½ mile of a state highway.”
- Topographic, geographic or geological constraints that physically preclude or significantly impede construction of an interconnected transportation system, including the provision of transit service and accessible, multi-modal access to employment sites
- Stormwater basin capacity constraints, including legal or environmental policy constraints that prohibit wastewater or stormwater discharges within a specific basin, geographic area or river reach.
- Wastewater system capacity constraint, including legal or environmental policy constraints that prohibit wastewater or stormwater discharges within a specific basin, geographic area or river reach.

Others parts of the OAR 660-024-0060(8) analysis require the City to consider, evaluate and compare potential service and capacity impacts to existing or planned facilities and services that serve land already in the UGB. In this step the City determined whether potentially suitable lands can physically be served. This includes consideration of whether facilities and services are physically possible given how such facilities and services would impact capacities of existing and planned facilities and services. OAR 660-024-0060(8) provides a list of facilities and services that must be addressed in the public facilities and services comparative analysis:

OAR 660-024-0060(8)

“The Goal 14 boundary location determination requires evaluation and comparison of the relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services needed to urbanize alternative boundary locations. This evaluation and comparison must be conducted in coordination with service providers, including the Oregon Department of Transportation with regard to impacts on the state highway system. “Coordination” includes timely notice to service providers and the consideration of evaluation methodologies recommended by service providers. The evaluation must include:

(a) The impacts to existing water, sanitary sewer, stormwater and transportation facilities that serve nearby areas already inside the UGB;

(b) The capacity of existing public facilities and services to serve areas already inside the UGB as well as areas proposed for addition to the UGB; and

(c) The need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements on existing roadways and, for urban areas of 25,000 or more, the provision of public transit service.”

As stated in OAR 660-024-0060(8)(a-c), impacts to existing water, sanitary sewer, storm water and transportation facilities and capacity of facilities that serve nearby areas already inside the UGB, and the need for new transportation facilities, are key factors to be considered in making a determination with respect to the provision of public facilities and services needed to urbanize alternative boundary locations. Thus such impacts and needs are key factors to be considered in making a determination that a particular area is suitable to accommodate the need deficiency determined under OAR 660-024-0050 and are identified in Table 4.

Extending public water and wastewater and would impact existing services primarily by adding flows to existing mains or via new mains. Volumes of flows to the MWMC sewage treatment facility would increase. Water quality regulations will require pretreatment of discharges. Additional water volume needs would increase SUB water treatment needs. As stated in Table 4, extension of mains is not physically possible in some areas.

Adding vehicular trips to serve industrial and commercial land uses would impact existing roads and bridges primarily by increasing traffic and by creating physical stress on roadways not designed and constructed to withstand heavy truck and public transit buses. Road maintenance needs would increase as facility size and length increases. Operational costs would increase as facility size, length and distance from operations centers increases. Adding additional stormwater flows to receiving streams and rivers would impact capacity of facilities that serve nearby areas already inside the UGB. For example, the Cedar Creek basin (Far East study area) is already nearing capacity while the easternmost portion of the UGB that drains into that basin is yet to be fully developed. Most areas in the UGB study are outside of existing City drainage basins. Water quality regulations will require pretreatment of all discharges.

Expansion of the water, wastewater and stormwater systems will create additional maintenance needs, increasing overall systems maintenance needs.

Industrial and commercial development would generate need for transit service. Increasing industrial and commercial development in an area is likely to result in an increase in transit service to an area that could benefit the overall system as well as end users in an area.

The City evaluated these impacts when it identified existing water, sanitary sewer, storm water and transportation facilities that serve nearby areas already inside the UGB in Table 5 (page 237-251). Table 5 identifies substantial infrastructure needs to serve exception land.

For the purpose of evaluating impacts to existing water, sanitary sewer, storm water and transportation facilities and capacity of facilities that serve nearby areas already inside the UGB, and the need for new transportation facilities, the City grouped the potentially suitable second priority parcels within general geographic areas as shown in Table 2.

For the purpose of evaluating serviceability of parcels within the second priority [ORS 197.298(3)(a)] category, the City grouped the potentially suitable second priority parcels within general geographic areas as shown in Table 5.

For each Study Area general geographic grouping, the City engineers, service providers, and ODOT staff provided an assessment of facilities that would likely require upgrading or replacement in order to provide additional capacity to serve development beyond the existing UGB. Those assessments are listed in Table 5.

The City's evaluation and comparison of the relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services needed to urbanize alternative boundary locations was conducted in coordination with service providers, including the Oregon Department of Transportation with regard to impacts on the state highway system.

As required in OAR 660-024-0060(8)(a), the City evaluated and compared the relative advantages and disadvantages of potentially suitable second priority exception land by gathering and compiling data in Table 2: General Description of Second Priority Exception Lands Parcels and Constraints, Table 3: Second Priority Land Public Services Analysis Summary, and Table 5 Second Priority Land Public Facilities and Services Analysis Summary. Based on this compilation of input and data, and the facilities plans described in pages 212-235, the City determined whether a parcel or group of exception parcels could reasonably be provided with the water, sewer/wastewater, stormwater, and transportation including transit facilities and services needed to urbanize land to accommodate the need deficiency determined under OAR 660-024-0050 within the 2010-2030 planning period.

The City correctly applied the requirement of OAR 660-024-0060(8)(a) in its analysis of second priority land under ORS 197.298.

As stated in OAR 660-024-0060(8)(b), the capacity of existing public facilities and services to serve areas already inside the UGB as well as areas proposed for addition to the UGB is a key factor to be considered in making a determination with respect to the provision of public facilities and services needed to urbanize alternative boundary locations, and thus capacity is a key factor to be considered in making a determination that a particular area is suitable to accommodate the need deficiency determined under OAR 660-024-0050.

As required in OAR 660-024-0060(8)(b), the City evaluated and compared impacts to existing public facilities and services to serve areas already inside the UGB by gathering and compiling data in Table 2: General Description of Second Priority Exception Lands Parcels and Constraints and Table 5: Second Priority Land: Public Services Analysis Summary. Based on this data, the City determined whether and how providing a parcel or group of second priority exception parcels with the water, sewer/wastewater,

stormwater, and transportation including transit services needed to urbanize land to accommodate the need deficiency determined under OAR 660-024-0050 would impact existing and planned public facilities and services within the 2010-2030 planning period.

The City correctly applied the requirement of OAR 660-024-0060(8)(b) in its analysis of second priority land under ORS 197.298.

As stated in OAR 660-024-0060(8)(c), the need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements on existing roadways — and as Springfield is an urban areas of 25,000 or more — the provision of public transit service, are key factors to be considered in making a determination with respect to the provision of public facilities and services needed to urbanize alternative boundary locations; and thus are key factors to be considered in making a determination that a particular area is suitable to accommodate the need deficiency determined under OAR 660-024-0050.

As required in OAR 660-024-0060(8)(c), the City evaluated and compared advantages and disadvantages with respect to the need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements on existing roadways and the provision of public transit service by gathering and compiling facilities maps and data in Table 2: General Description of Second Priority Exception Lands Parcels and Constraints and Table 3: Second Priority Land: Public Services Analysis Summary. The City collected public facilities data from ODOT and other Federal, State and Local agencies and service providers. Based on this data, the City determined whether a parcel or group of second priority exception parcels could be made accessible with the transportation facilities including transit services needed to urbanize land to accommodate the need deficiency determined under OAR 660-024-0050 within the 2010-2030 planning period.

The City correctly applied the requirement of OAR 660-024-0060(8)(c) in its analysis of second priority land under ORS 197.298.

OAR 660-024-0060 (7)

“For purposes of Goal 14 Boundary Location Factor 2, “public facilities and services” means water, sanitary sewer, storm water management, and transportation facilities.”

Consistent with OAR 660-009-0005(9) : *“‘Serviceable’ means a city or county has determined that public facilities and transportation facilities, as defined by OAR chapter 660, division 11 and division 12, currently have adequate capacity for development planned in the service area where the site is located or can be upgraded to have adequate capacity within the 20-year planning period.”* For land to be reasonably considered as serviceable within the planning period, “orderly and economic provision of public facilities and services” must be possible within the planning period.

Using GIS mapping and analysis tools and input received from the CIBL Technical Advisory Committee, City, County and State public agency staff including ODOT and Lane Transit District, other service providers and the public, the City conducted analysis to evaluate, compare and determine whether and

how water, sanitary sewer, storm water management, and transportation facilities could be provided to potentially suitable second priority exception parcels within the seven geographic areas: McKenzie View, Mohawk, Oxbow/Camp Creek, Far East, Wallace Creek, Jasper Bridge, and Seavey Loop. The result of this step is a determination of whether parcels within each priority and within each geographic grouping can reasonably be served to support the employment land uses identified in the CIBL/EOA within the 2010-2030 planning horizon.

The City correctly applied the requirement of OAR 660-024-0060(7) in its analysis of second priority land under ORS 197.298 by evaluating and comparing water, sanitary sewer, storm water management, and transportation facilities in its analysis of "public facilities and services", as demonstrated in the summary of data in Table 5 and as further supported by evidence in the record.

The following section of this report provides a general overview and maps of existing water, sanitary sewer, storm water management, and transportation facilities to describe the physical location and proximity of existing facilities to potentially suitable parcels and to identify physical or regulatory barriers that would make service extensions difficult or infeasible to support development within the 2010-2030 planning period. As previously noted, this section provides explanation and evidence to support the City's findings addressing ORS 197.298(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060(1)(c), OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR 660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c).

This section provides additional evidence to support the City's rationale for excluding from consideration the McKenzie View A, West Jasper/Mahogany, Clearwater, Seavey Loop A, D, F and Seavey Loop/Goshen exception parcels in the previous step.

To avoid unnecessary redundancy within this report, the following information identifies information used by the City to identify and compare public infrastructure, facilities and services deficiencies through the remainder of this boundary location alternatives analysis. Thus, this section provides additional evidence to support the City's rationale for excluding lands from consideration in the previous steps and subsequent steps.

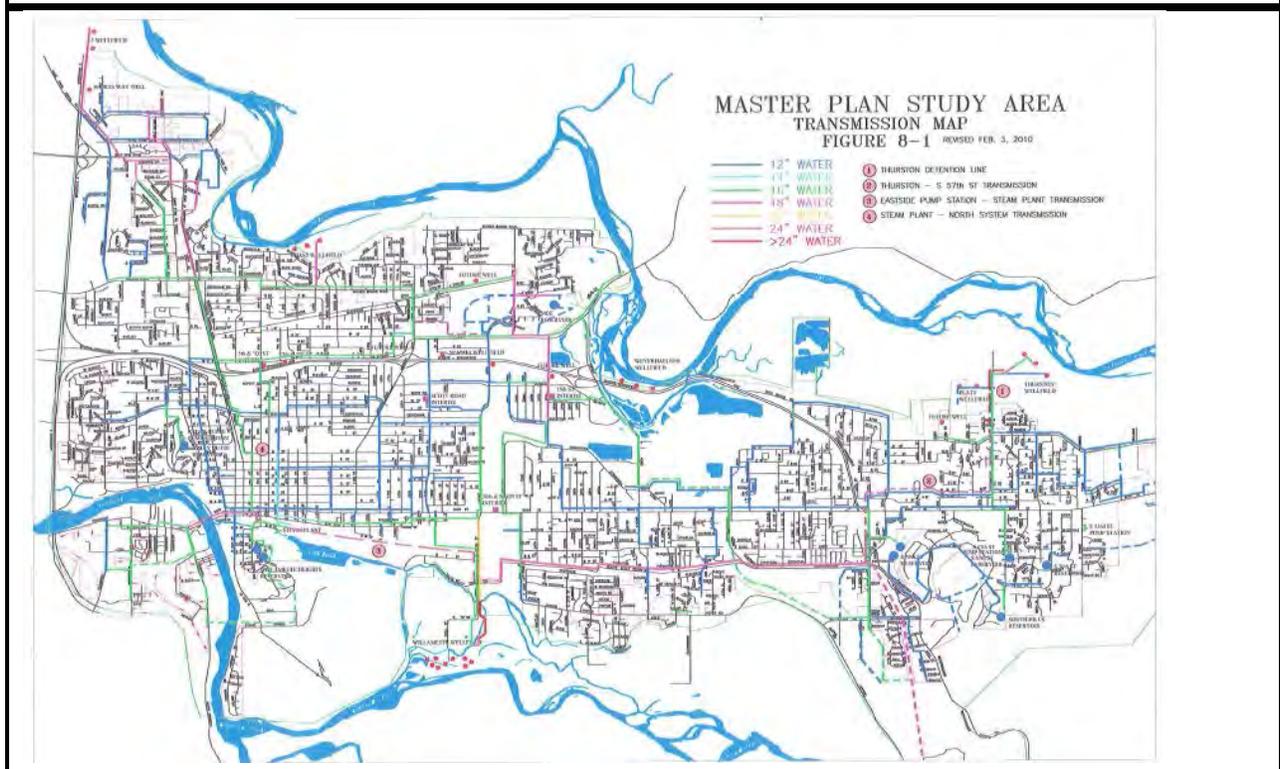
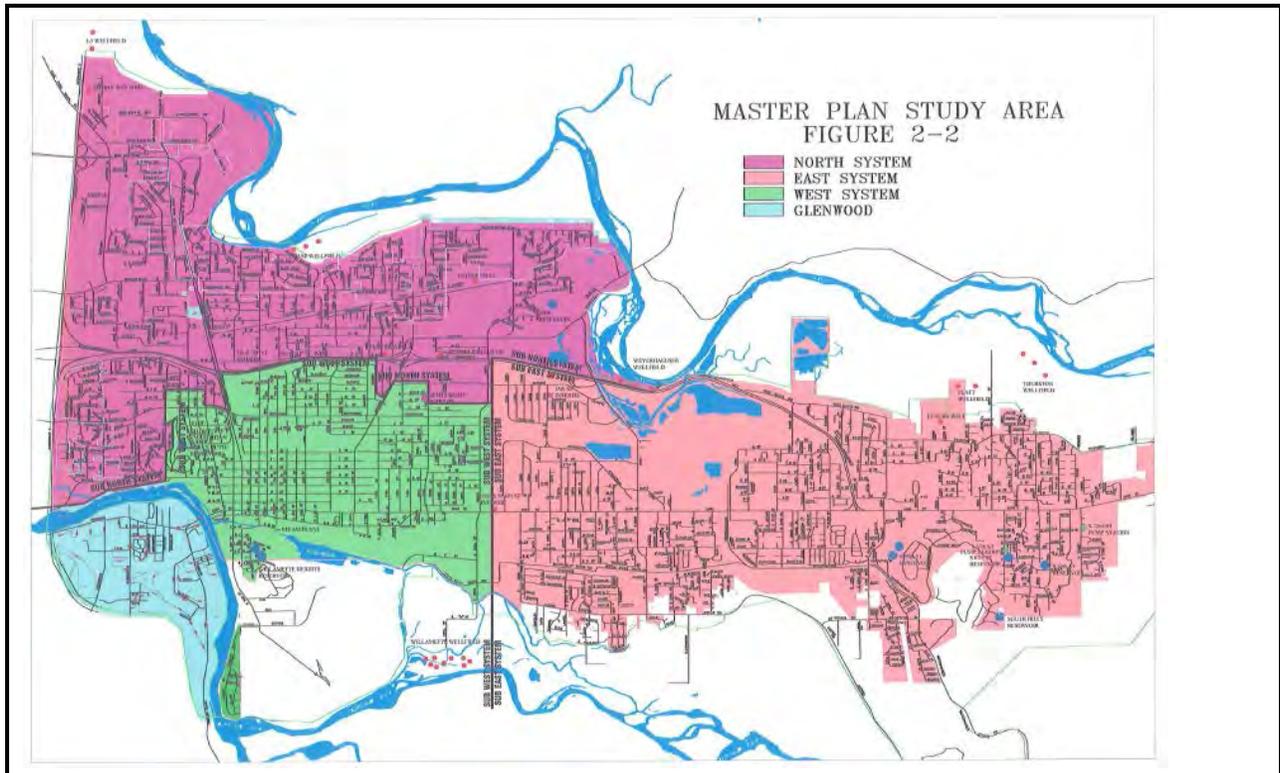
The City incorporated maps and data from City, Eugene-Springfield Metro area and Lane County facilities plans and service provider plans to complete the Public Services Analysis, including but not limited to:

Water

- *Water System Master Plan for Springfield Utility Board, April 2010*
- *Springfield Utility Board & Rainbow Water District Water Management and Conservation Plan, 2012*

The following map provides a general depiction of the existing water system in the area.

Existing Water System, Master Plan for Springfield Utility Board, Figures 2-2 and 8-1



The preceding maps depict the extent of SUB/Rainbow existing water system in 2010 and are included to explain how waterways and distance are constraints that influence and place limitations on potential service extensions to lands beyond the existing UGB.

In addition to the water system depicted above, the Willamette Water Company currently provides water service to the Seavey Loop/Goshen area by purchasing water from Eugene Water and Electric Board (EWEB), and transmitting water through its system from Bloomberg Reservoir, west of I-5, to homes and businesses. The company owner's representative submitted information into the record describing the existing system, and the owner confirmed the accuracy of information submitted.³⁶ A company representative also participated in the College View Study Area Stakeholder Working Group.³⁷

Oregon Dept. of Water Resources staff Michael Mattick provided information about Willamette Water Company:³⁸

- Has water right for 4 cfs, and is currently using 0.43 cfs. as of May 21, 2014.
- Has a permit valid through October 1, 2040 (Permit S-50877)
- Buys treated water from EWEB and runs it through their piped system
- Serves 148 connections, and estimated 444 users; expects 541 connections serving 1,620 in 2040.

Consistent with Metro Plan policy, it is SUB's position that if lands in Seavey Loop/College View area were added to the UGB, "they would be served by SUB, as municipal water providers take over service once an end user is annexed,"³⁹ "Short term, they may continue to be served by their incumbent water provider. As in the past, for efficiency SUB is open to providing a transition to SUB service sooner rather than later."

Sanitary Sewer

- *City of Springfield Wastewater Master Plan*, June 2008, prepared by CH2MHill

The following map provides a general depiction of the existing wastewater system in the area.

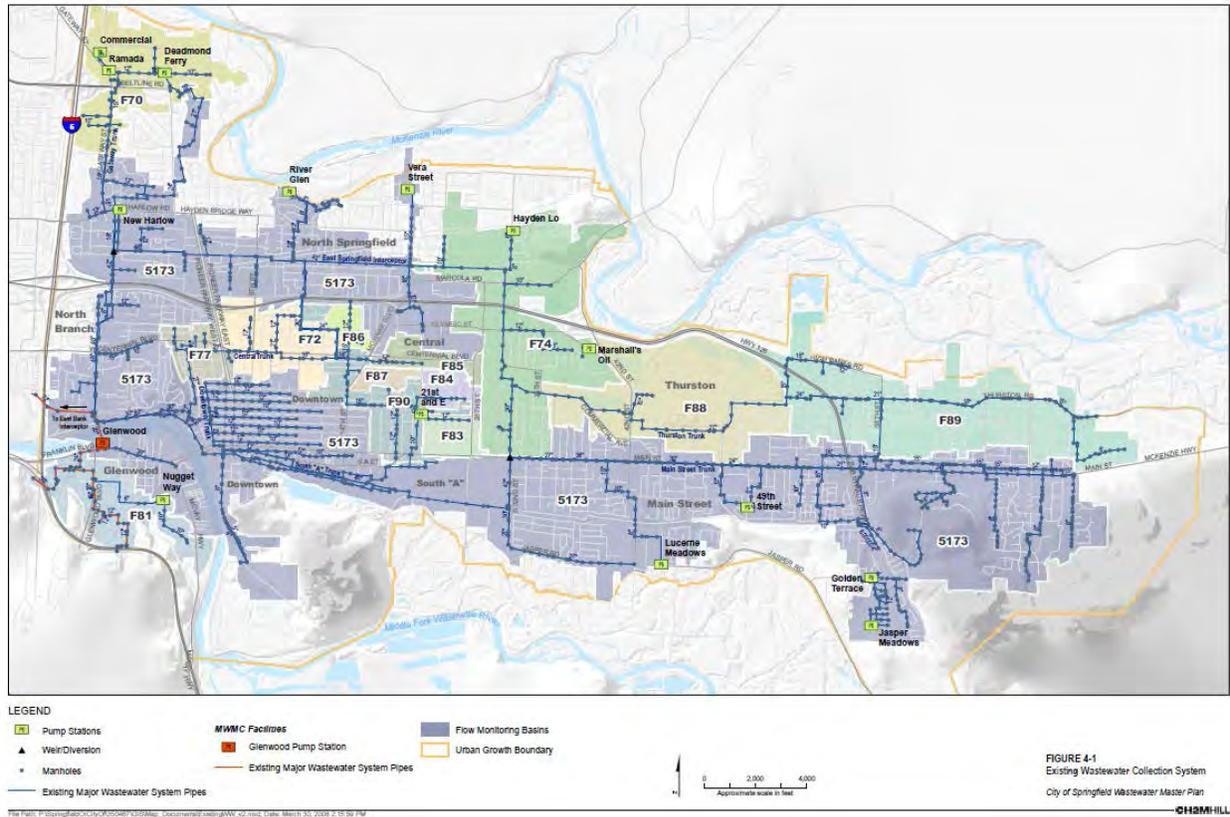
Existing Wastewater Collection System, City of Springfield Wastewater Master Plan Figure 4-1

³⁶ Letter from Bill Kloos to City of Springfield and Lane County Planning Commissions, Feb. 17, 2010; and email to staff Pauly from Greg Demers, June 21, 2013.

³⁷ Stakeholder Working Group meetings were held on Feb. 11, 2015, February 25, 2015, and March 4, 2015.

³⁸ Meeting with staff Pauly on May 20, 2014; email and attached copy of S-50877 permit to staff Pauly on May 21, 2014.

³⁹ Email from SUB General Manager Jeff Nelson to staff Pauly, May 23, 2014



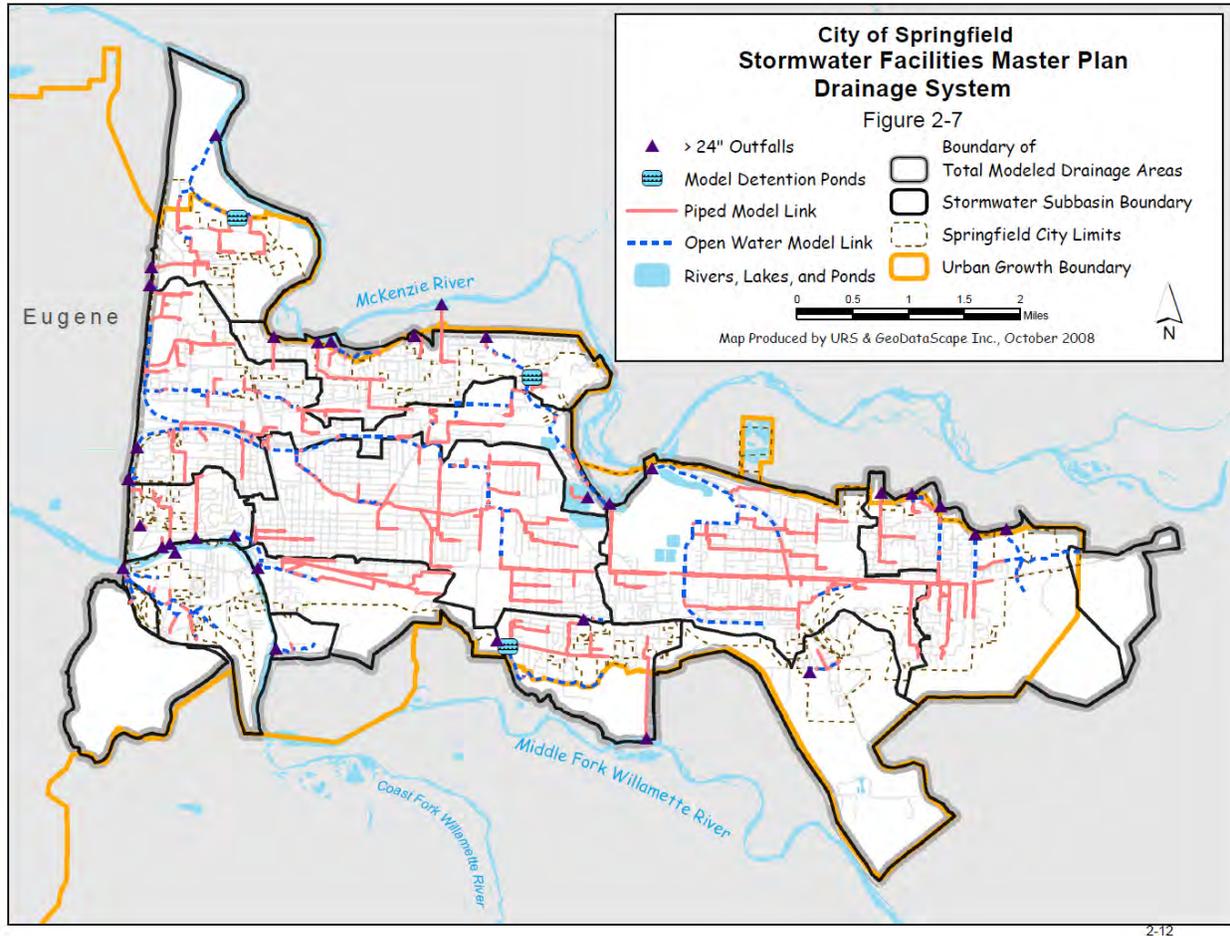
The preceding map depicts the extent of the existing wastewater service area and system in 2008 and explains how topography, waterways and distance are constraints that influence and place limitations on potential service extensions to lands beyond the existing UGB.

Stormwater Management

- *City of Springfield Stormwater Facilities Master Plan, Oct. 2008, prepared by URS*

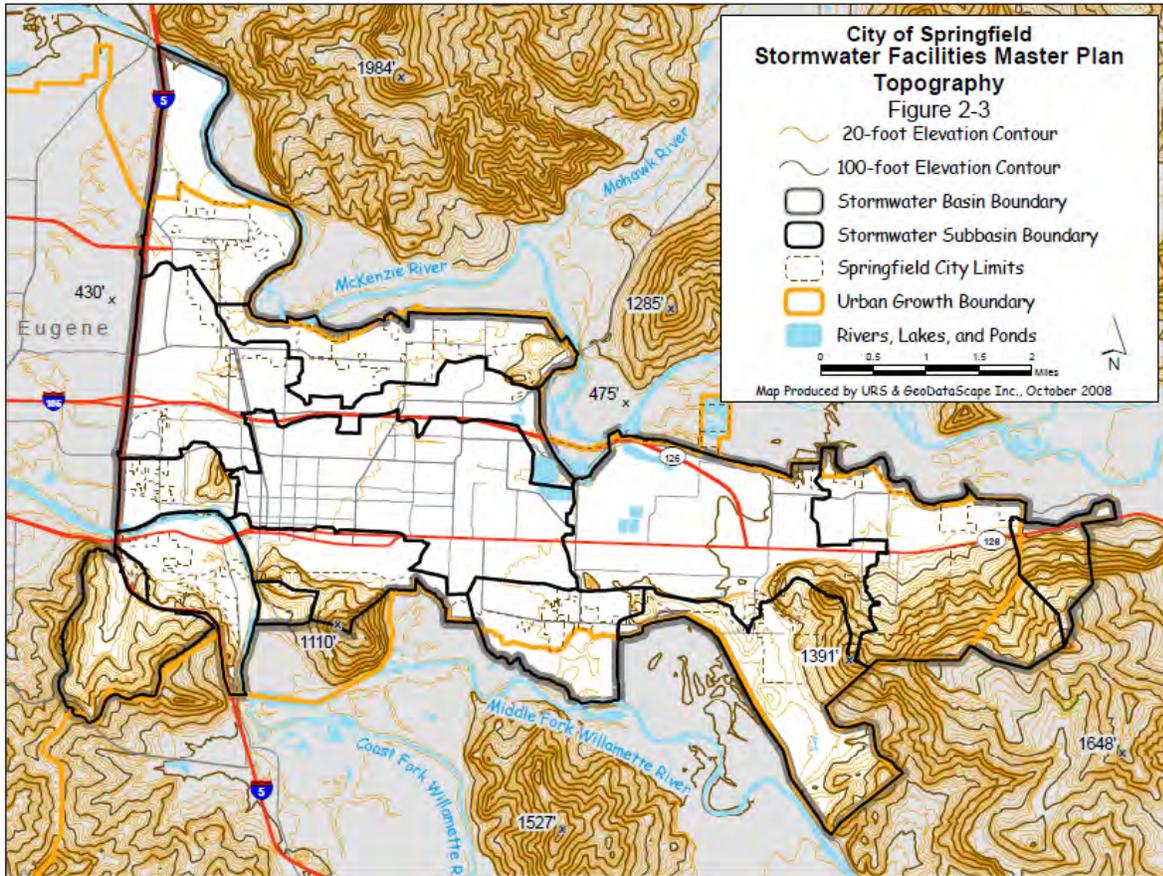
The following map depicts the extent of the existing stormwater drainage system, including outfalls, in 2008 and explains how topography, waterways, outfalls to waterways, and distance are constraints that influence and place limitations on potential service extensions to lands beyond the existing UGB. The City’s findings under Goal 11 provide more information about stormwater management facilities and applicable policies.

City of Springfield Stormwater Facilities Master Plan Figure 2-7 Drainage System



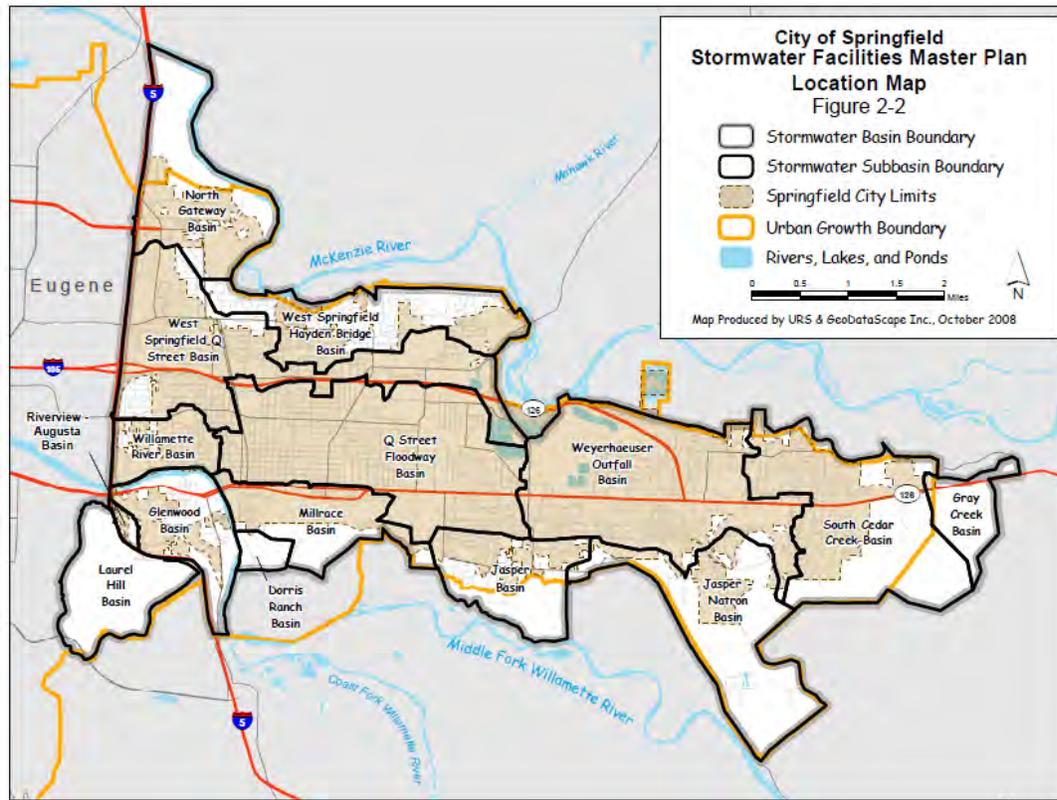
The following map depicts topography surrounding the UGB to demonstrate how topography presents constraints that influence and place limitations on potential service extensions to lands beyond the existing UGB.

Stormwater Facilities Master Plan Figure 2-3 Topography



The following map depicts the extent of the existing stormwater service area and system in 2008 to explain how topography, waterways, gravity flow and distance influence and place limitations on potential service extensions to lands beyond the existing UGB.

Stormwater Facilities Master Plan Figure 2-2 Basin Location



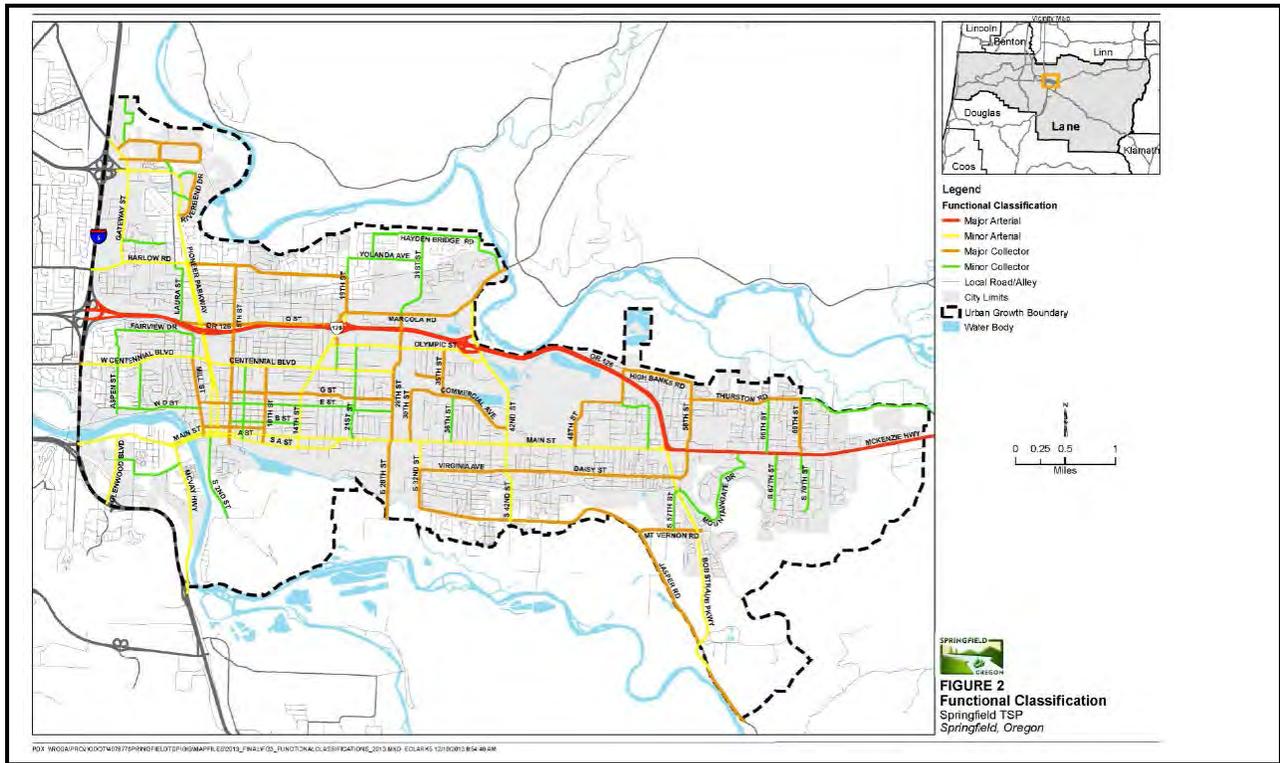
Transportation

- 2004 Lane County Transportation System Plan
- Lane County Roads Inventory
- 2035 City of Springfield Transportation System Plan
- 2002 Eugene-Springfield Transportation System Plan (TransPlan)
- Central Lane MPO Regional Transportation Plan

The following maps provide general depictions of the existing transportation system in Springfield and in the areas outside the UGB. The City's findings under Goal 12 provide more information about transportation facilities and applicable policies.

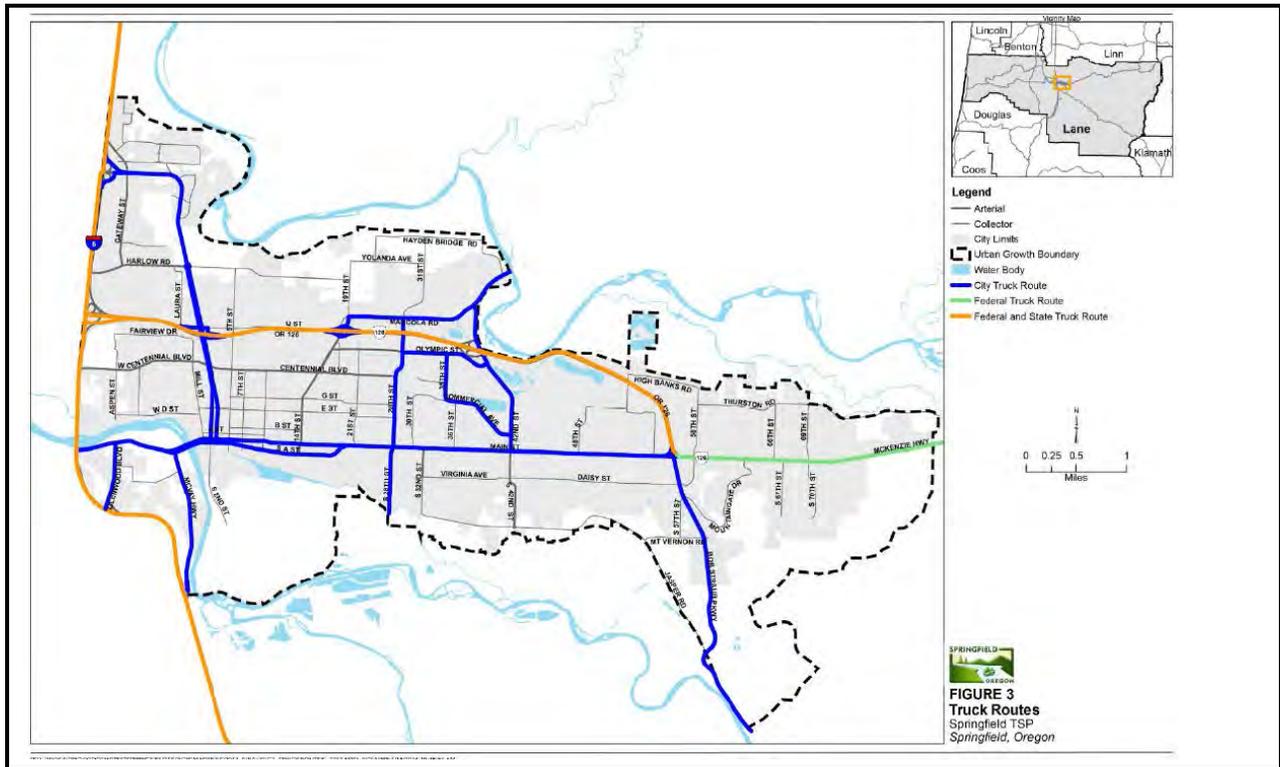
Springfield TSP Map Functional Classifications (2014) depicts the existing transportation system backbone to compare the location of existing facilities in relationship with lands outside the UGB. Lack of transportation facilities is a constraint that influences and place limitations on potential service extensions to lands beyond the existing UGB.

Springfield TSP Functional Classifications (2014)



The following map depicts existing Federal, State, and Local truck routes to compare the location of existing facilities in relationship with lands outside the UGB. Location relative to transportation facilities that are designated, designed and built to support truck traffic is a consideration that influences and place limitations on potential service extensions to serve industrial and commercial lands within and beyond the existing UGB.

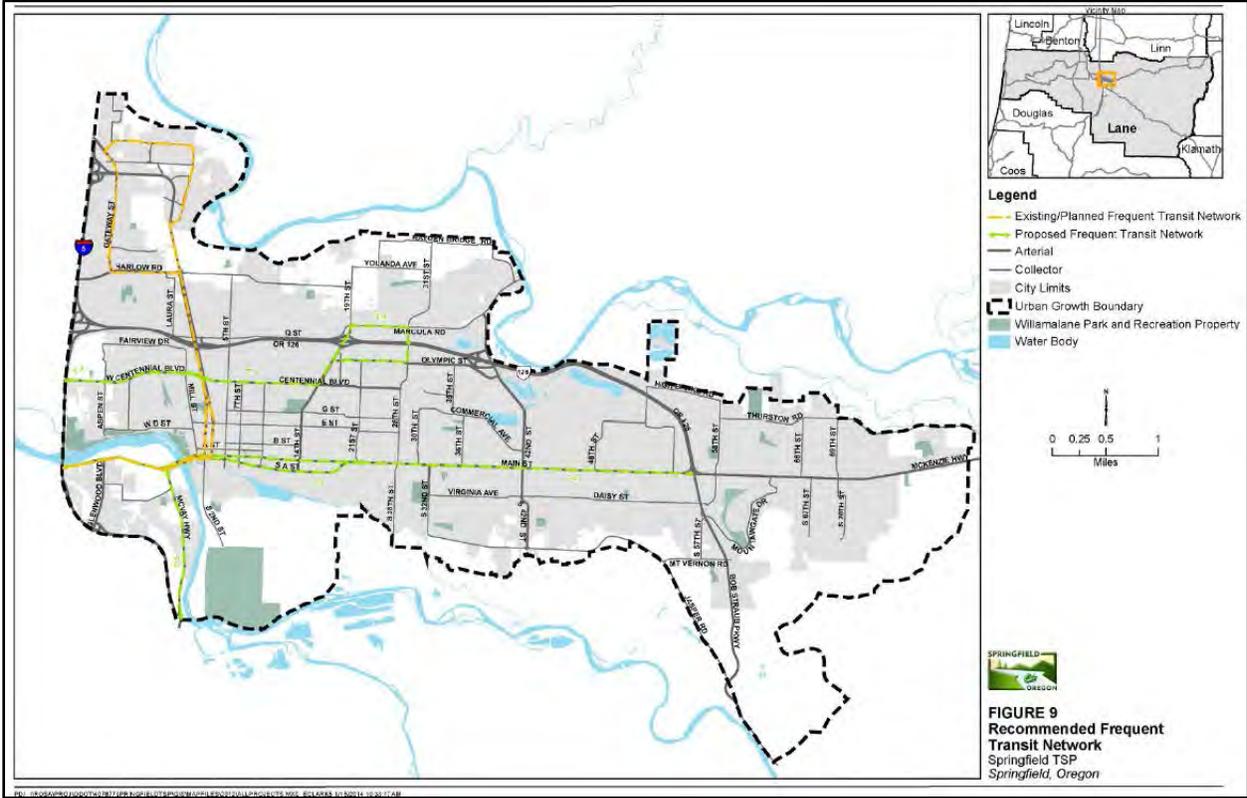
Springfield TSP Truck Routes



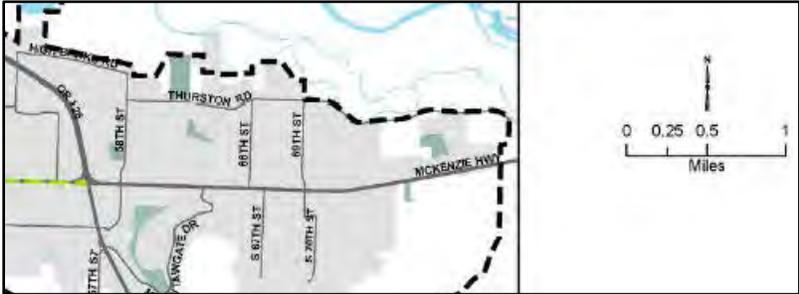
Planned Frequent Transit Service Network. The following map depicts the existing and planned frequent transit network to compare the location of existing and planned transit facilities in relationship with lands outside the UGB. OAR 660-024-0060(8)(c) identifies the provision of transit service as a service that cities larger than 25,000 must evaluate and compare in their UGB location alternatives analyses. Thus, the availability of and proximity to existing and planned networked transit facilities to

serve urban development is an important consideration to ensure that new employment areas are accessible to the population, including the transportation disadvantaged.

Springfield TSP Figure 9 Recommended Frequent Transit Network



As shown in Springfield TSP figure 9, the Recommended Frequent Transit Network is planned to extend to approximately 2.3 miles west of the eastern UGB extent on Main Street/Highway 126.



Detail of Springfield TSP Figure 9 Recommended Frequent Transit Network map

As shown in Springfield TSP figure 9, the Recommended Frequent Transit Network is currently located approximately 0.25 miles from the northern extent UGB (International Way/Maple Island Rd.).



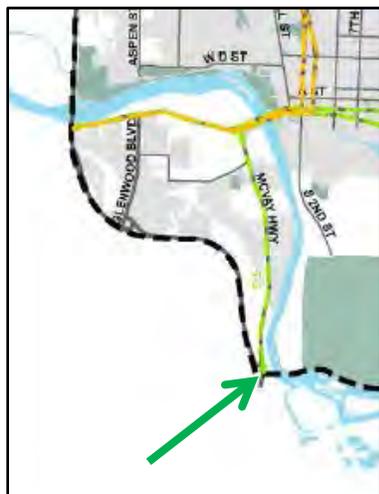
Detail of Springfield TSP Figure 9

As shown in Springfield TSP figure 9, the Recommended Frequent Transit Network is planned to extend to approximately 1.25 miles to the northern extent of the UGB at Marcola Rd/Hayden Bridge.



Detail of Springfield TSP Figure 9

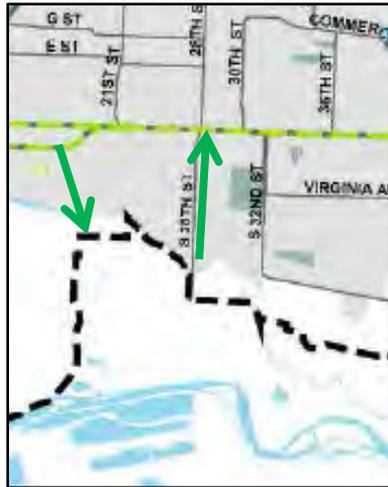
As shown in Springfield TSP figure 9, the Recommended Frequent Transit Network is planned to extend to the southern extent of the UGB at McVay in Glenwood.



Detail of Springfield TSP Figure 9

As shown in Springfield TSP figure 9, the Recommended Frequent Transit Network is planned to extend on Main Street approximately 0.75 miles from the southern extent of the UGB at South 28th Street and

on South A approximately ½ mile from the UGB. Existing frequent transit service is on Main Street.



Detail of Springfield TSP Figure 9

As shown in Springfield TSP figure 9, the Recommended Frequent Transit Network is planned to extend to approximately 2.75 miles to the southeastern extent of the UGB at Jasper Road.

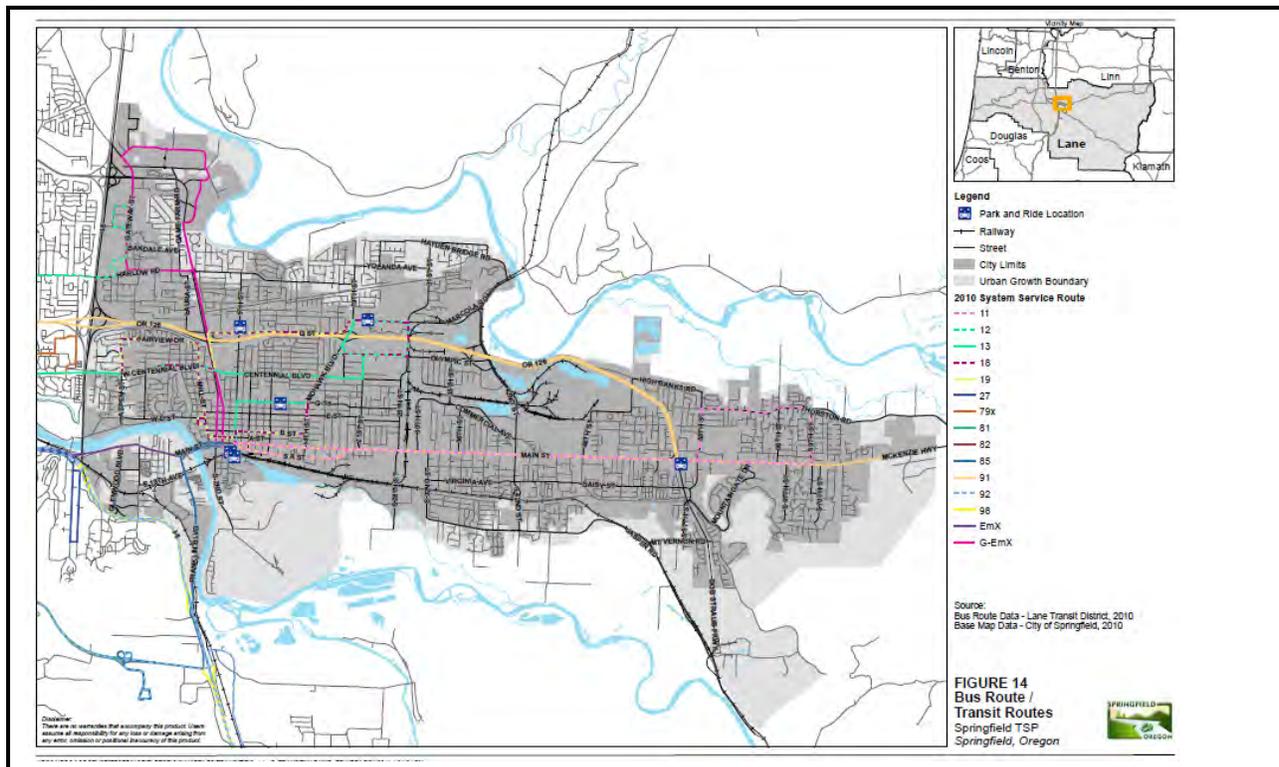


Detail of Springfield TSP Figure 9

Existing Transit Service Routes

The following map depicts existing bus/transit routes operating in 2010 to demonstrate the location of existing transit facilities in relationship with lands outside the UGB. OAR 660-024-0060(8)(c) identifies the provision of transit service as a service that cities larger than 25,000 must evaluate and compare in their UGB location alternatives analyses. Thus, the availability of and proximity to existing and planned networked transit facilities to serve urban development is an important consideration to ensure that new employment areas are accessible to the population.

Springfield TSP Existing Conditions Bus Routes/Transit Routes



As shown in the following details of the Lane Transit District System Map, three exception areas — the Far East, Seavey Loop/Goshen and Jasper Bridge B — are currently served by the public transit system or have existing routes in the vicinity of the exception area.

In 2010, Route 91 McKenzie Bridge provides service along East Main/Highway 126 via Route 91 with limited service and trips:

91 - McKenzie Br - Route Description

The route begins at Eugene Station (Bay G) and travels North on Olive, East on 10th Avenue, North on High Street, and East on 7th Avenue. The bus crosses the Ferry Street Bridge and travels on I-105/Highway 126 to arrive at Thurston Station (Bay B). It continues along Main Street/Highway 126 to serve Walterville, Leaburg, Vida, Nimrod, Finn Rock, Blue River, McKenzie Bridge and McKenzie River Ranger Station. To return the bus travels on the same route to Eugene Station.

During morning trips the bus serves McKenzie River Drive between Blue River and McKenzie Bridge before arriving at the Ranger Station. After noon, this area will be served after departing from the Ranger Station to head back to Eugene Station

Route Variation: The weekday 5:30 PM trip; the route begins at Eugene Station (Bay G) and travels North on Olive, East on 10th Avenue, North on High Street, and East on Broadway which becomes Franklin Boulevard where it serves the Onyx Street. Franklin Boulevard becomes South

A Street where the bus serves Springfield Station (Bay H). The bus continues East down South A Street to Main Street until reaching Thurston Station (Bay B). The bus travels on regular routing after Thurston Station.

The weekday 6:14 AM trip which begins at the McKenzie River Ranger Station and follows the same limited routing in reverse upon reaching Springfield Station. However, the bus travels from Franklin Boulevard East on 11th to Eugene Station.

Route 91 Map



Routes 91 and 11 detail of Springfield TSP Figure 14 TSP Existing Conditions Bus Routes/Transit Routes map showing the location of existing Route 91 transit service to eastern UGB extent. UGB is indicated by light gray.



As shown in the following description and route map detail of the Lane Transit District System Map, Route 92 Lowell/LCC provides limited service and trips connecting Eugene, Pleasant Hill and Lowell via Franklin Blvd. in the vicinity of the Seavey Loop/Goshen exception area, and following Highway 58 in the vicinity of exception area Jasper Bridge B:

92 - Lowell/LCC - Route Description⁴⁰

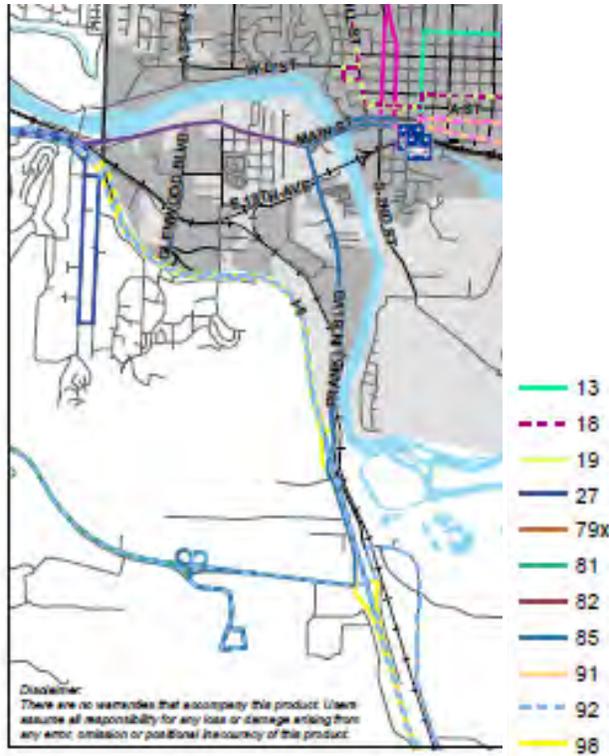
The route begins at Eugene Station (Bay I) and travels South on Willamette Street, East on 13th Avenue, and South on Pearl Street where it serves the West side of South Eugene High School before continuing South on Amazon Parkway. Upon reaching Amazon Station (Bay C), the bus turns East and travel on 30th Avenue to the Lane Community College exit, and South on Gonyea where it serves Lane Community College Station (Bay E), and Main Campus. The bus departs Lane Community College Station on Gonyea Road and travels East on 30th Avenue across I-5 onto Franklin Boulevard, and travels onto Seavey Loop Road. The bus continues towards Goshen and takes HWY 58 Eastbound where it serves Pleasant Hill. The bus travels North on Pioneer Street to Lowell, crossing Dexter Reservoir, West on East Main Street, North on Moss Street, and East on 2nd Street. The bus turns South on Pioneer Street and continues to Hwy 58 West to travel the regular routing to return to Eugene Station. Route Variation: The 6:32 PM trip leaving Lowell. The bus heads East on Jasper-Lowell Road and resumes on regular inbound routing until the bus reaches 20th Avenue. The 6:32 PM trip does not service LCC. The bus continues West on 30th Avenue and serves Amazon Station (Bay A). It continues North on Amazon Parkway, West on 19th Avenue, North on Oak Street, and West on 13th Avenue where it serves Sacred Heart Medical Center University District and UO Station (Bay B). The bus will head North on Kincaid Street and West on 11th Avenue to Eugene Station.

LTD Route 92 Map

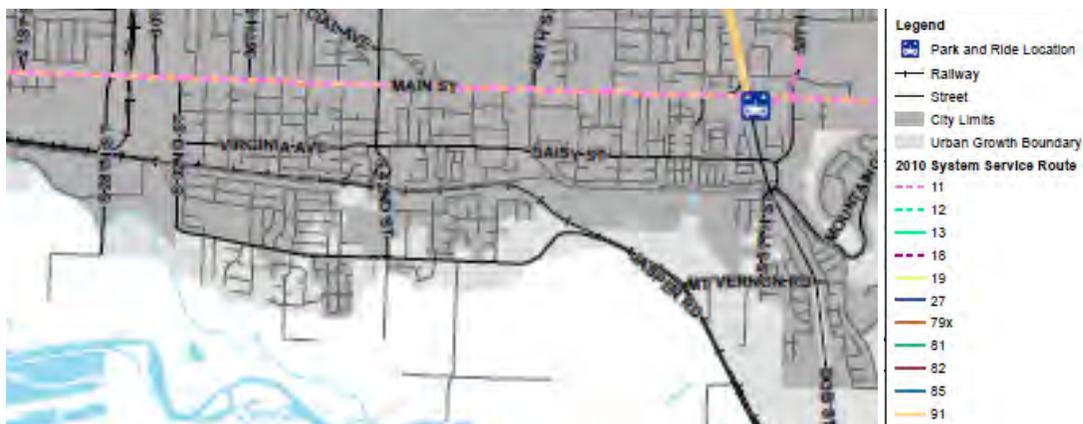


⁴⁰ LTD website <https://www.ltd.org/92-lowell-lcc-route-description/>

Route 92 Detail of Springfield TSP Figure 14 TSP Existing Conditions Bus Routes/Transit Routes map showing the location of existing Route 92 transit service to the southern UGB extent. UGB is indicated by light gray.

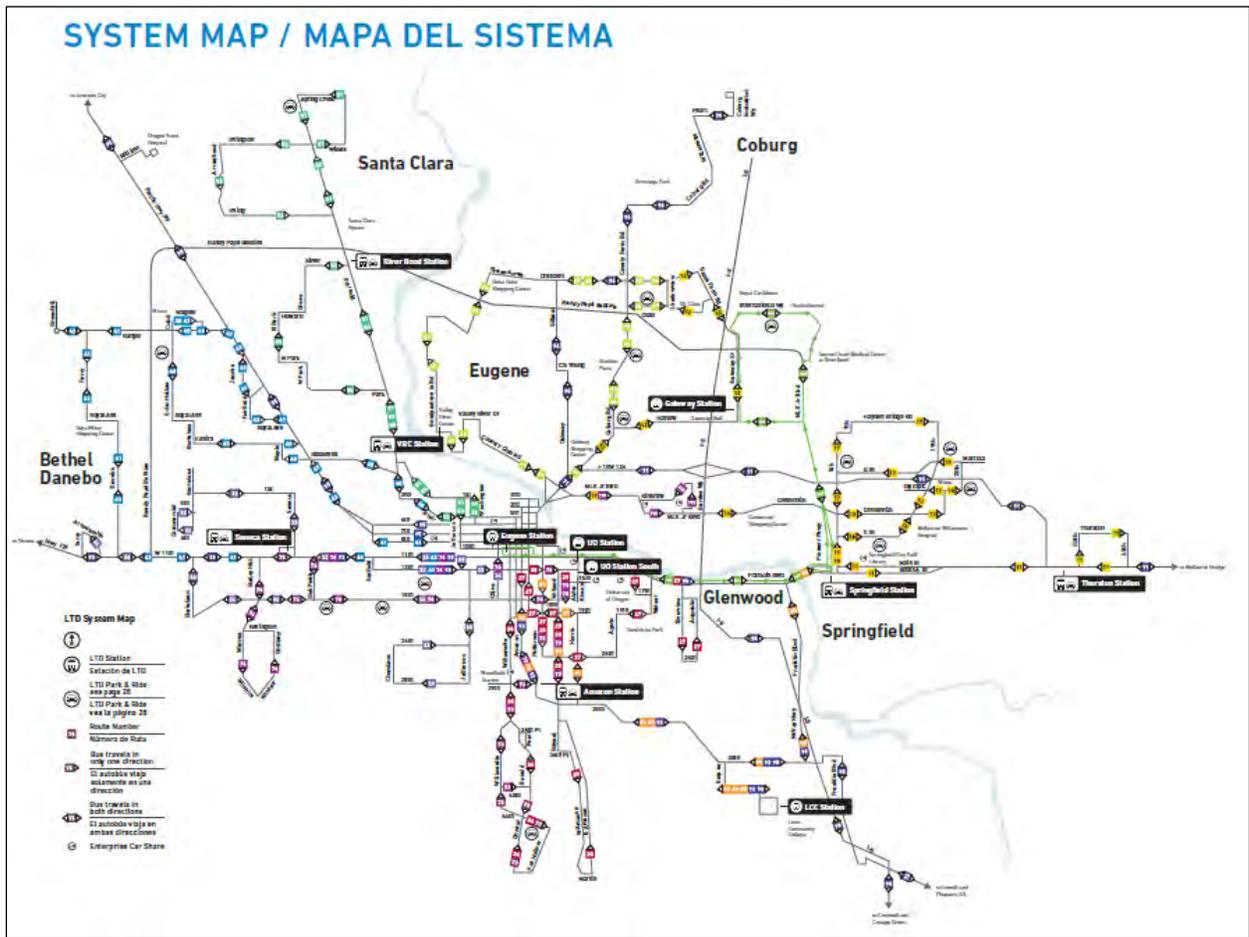


Route 11 Detail of Springfield TSP Figure 14 TSP Existing Conditions Bus Routes/Transit Routes map showing the relative location of existing Route 11 transit service to the southern UGB extent along Jasper Road. UGB is indicated by light gray.



Except where noted above, second and third priority exception and non-resource lands and marginal land areas are located distant to the Lane Transit District System.

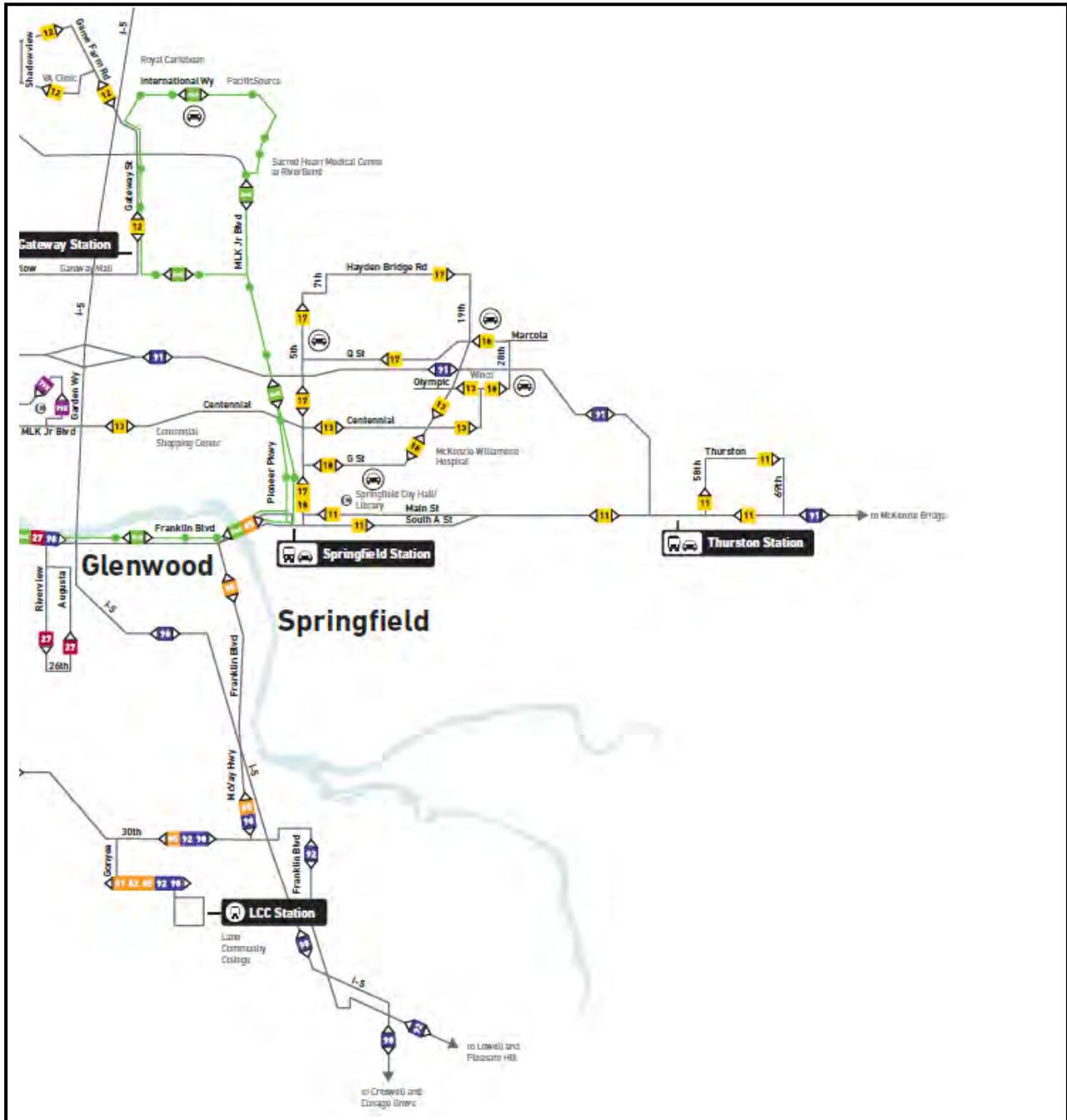
Lane Transit District System Map⁴¹



⁴¹ Lane Transit District website, <https://www.ltd.org/system-map/>

Springfield Detail of Lane Transit District System Map 2015⁴²

Green routes indicate existing EmX Bus Rapid Transit System frequent transit service.⁴³

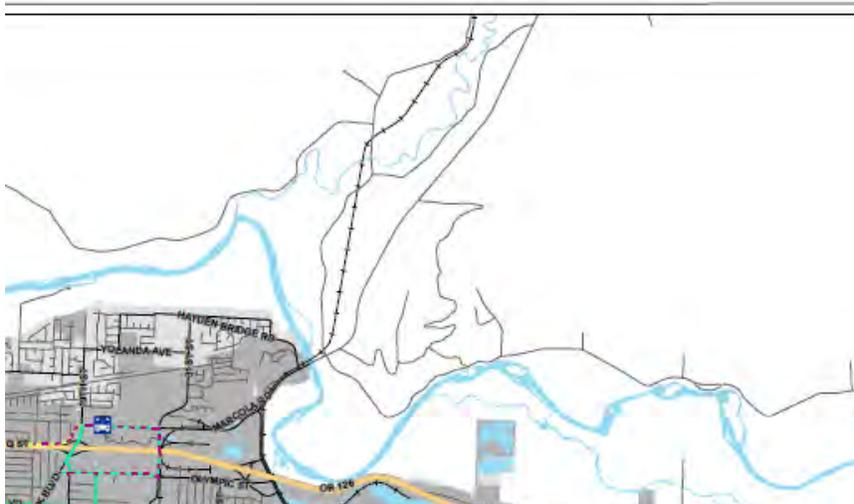


⁴² Lane Transit District website, <https://www.ltd.org/maps-stations-routing/> accessed 2-1-15.

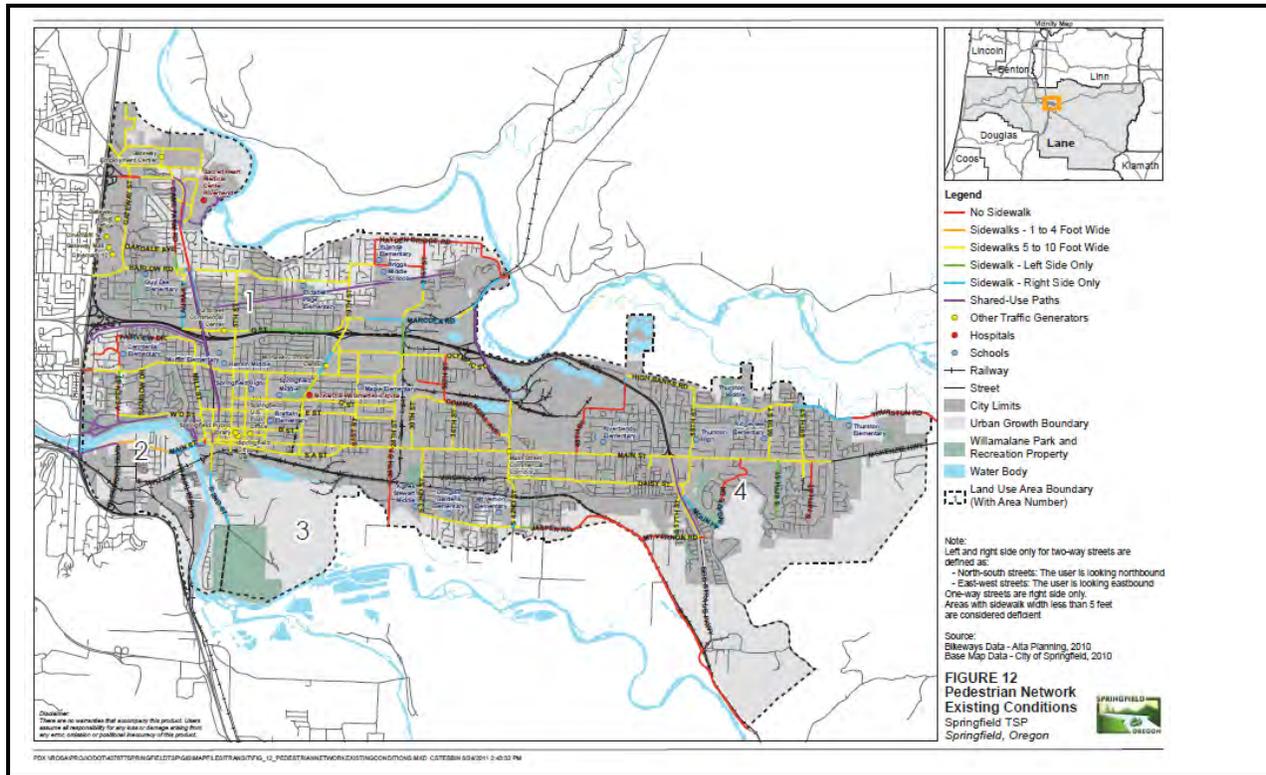
⁴³ The Main Street route study to select a Preferred Alternative for service improvements between Springfield Station and Thurston Station is underway in 2016.



Route 11 currently provides services in the Main Street corridor east to 58th Street (Thurston High School) continuing on Thurston Road east to 69th Street and back west to Thurston Station.



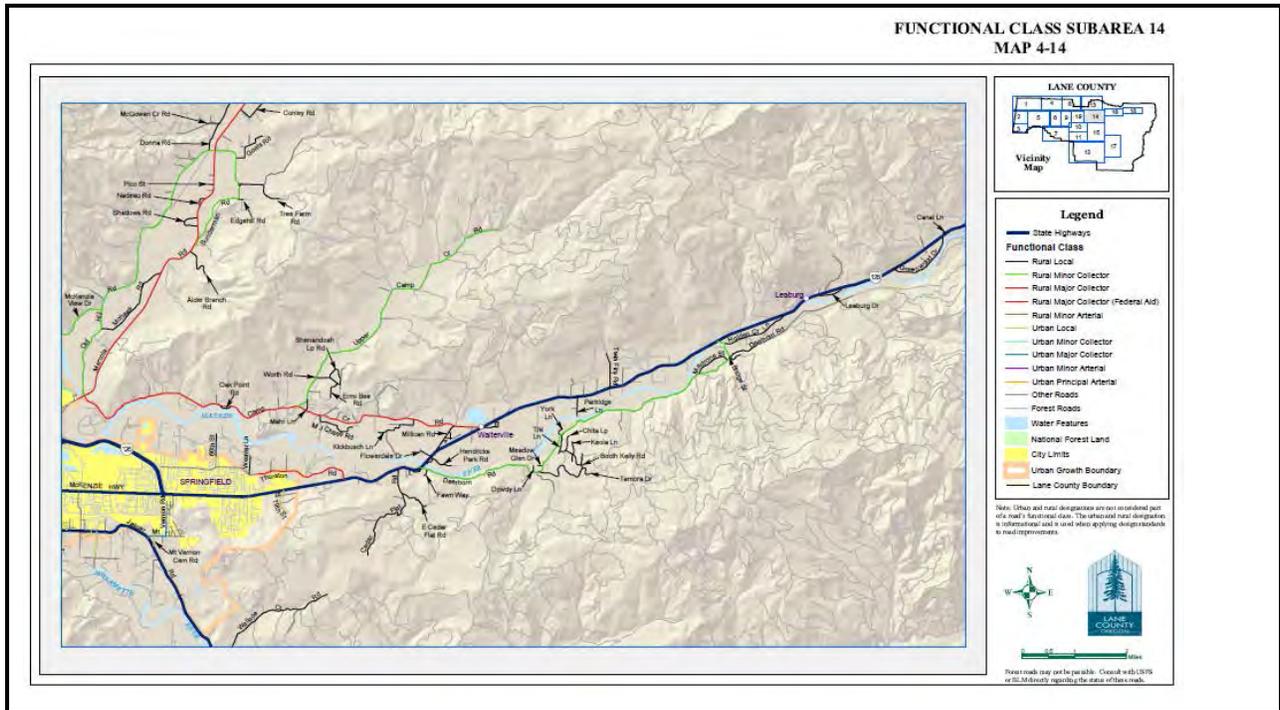
Springfield TSP Existing Conditions Pedestrian Network



The preceding map depicts Springfield’s existing network of pedestrian facilities, as of 2010. OAR 660-024-0060(8)(c) identifies the provision of transit service as a service that cities larger than 25,000 must evaluate and compare in their UGB location alternatives analyses. The accessibility of transit services is dependent upon one’s ability walk safely to and from a transit stop. Proximity to existing and planned networked pedestrian facilities is an important consideration to ensure that new employment areas are accessible to the workforce population, including the transportation disadvantaged and employees who choose alternative modes of transportation.

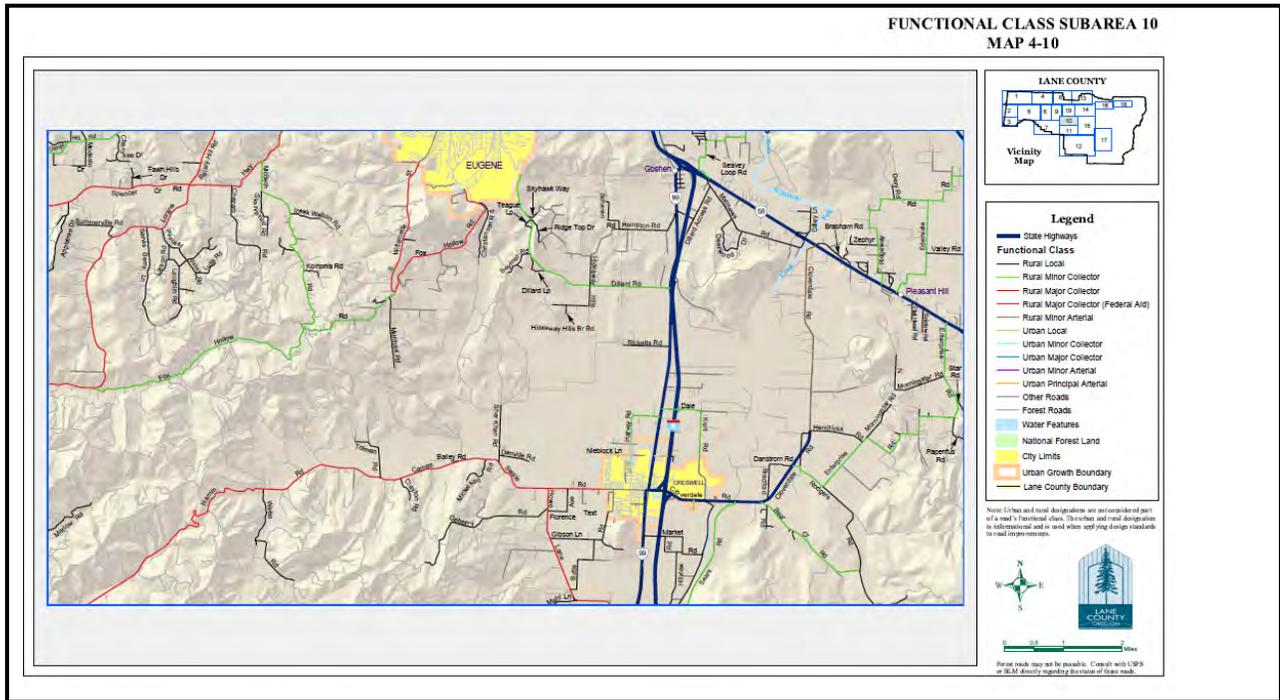
The following maps depict Lane County’s existing transportation system to explain the location of existing facilities in relationship with lands outside the UGB. The maps also depict topography as it relates to the location of the rural road network. Topography is a constraint that influences and places limitations on potential transportation extensions to lands beyond the existing UGB and to potential connectivity with lands inside the existing UGB.

Lane County TSP Functional Class Subarea 14



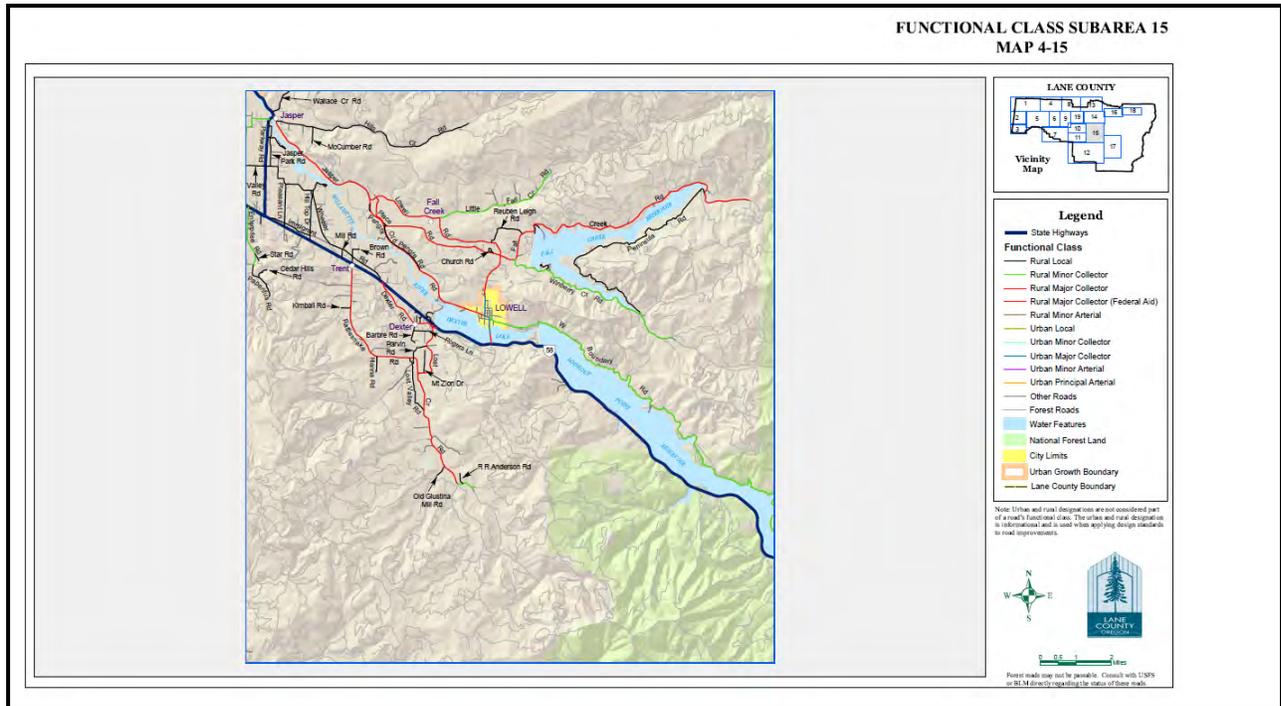
The preceding map depicts Lane County’s rural road network proximate to the **Far East, Thurston, Mohawk, Oxbow/Camp Creek, South Hills, Wallace Creek, and Clearwater** second priority exception areas. The preceding map depicts Lane County’s rural road network in the vicinity of the **Mohawk, Wallace Creek and Oxbow/Camp Creek** third priority marginal land areas.

Lane County TSP Functional Class Subarea 10



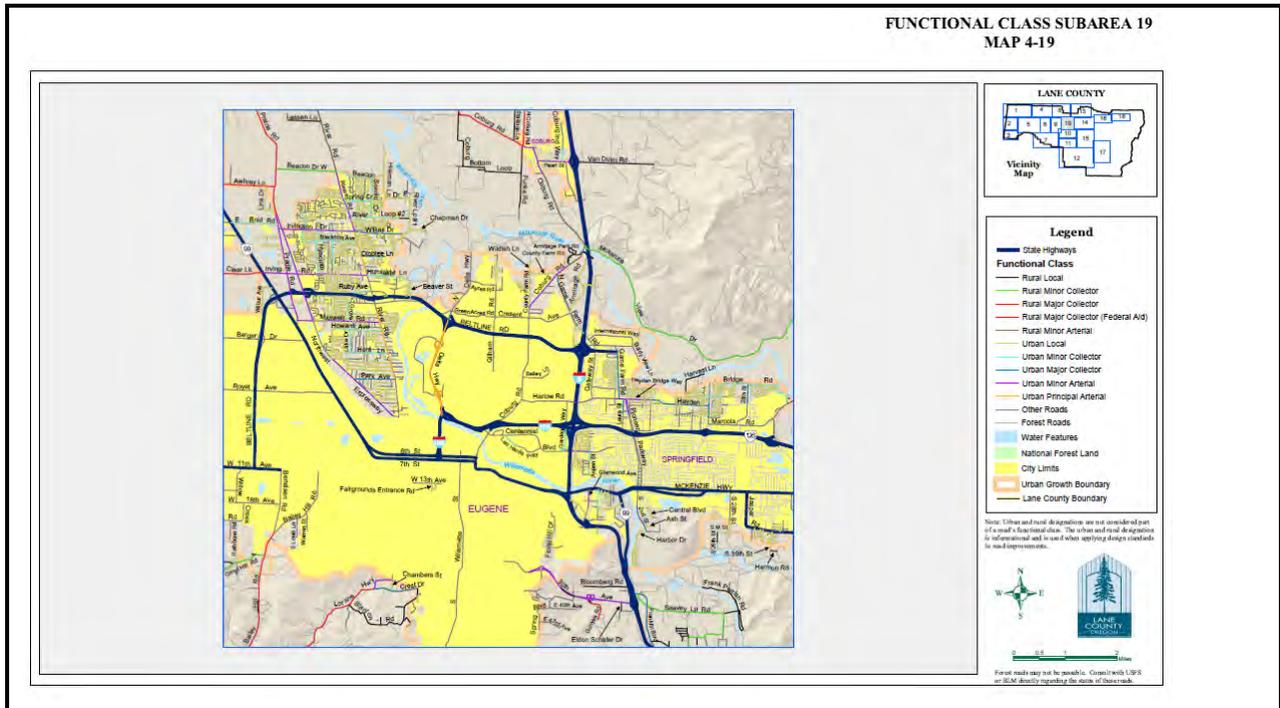
The preceding map depicts Lane County’s rural road network in the vicinity of the **Seavey Loop**, and **Seavey Loop/Goshen** second priority exception areas.

Lane County TSP Functional Class Subarea 15



The preceding map depicts Lane County’s rural road network in the vicinity of the **Wallace Creek** and **Jasper Bridge** second priority exception areas, and Wallace Creek third priority marginal areas.

Lane County TSP Functional Class Subarea 19



The preceding map depicts Lane County's rural road network in the vicinity of the **McKenzie View** and **Seavey Loop** second priority exception areas.

Public Services Analysis of Potentially Suitable Second Priority Land

Table 5 summarizes and compares the opportunities and constraints associated with constructing public facilities and providing public services to lands in the vicinity of the Springfield UGB. The information summarized in Table X is based on information received from City engineering and transportation staff, the Springfield CIBL Technical Advisory Committee (TAC), service providers, public agency staff that were consulted with throughout the multi-year urbanization study process, and the public facilities plans identified in the previous sections of this report. In the Public Facilities and Services Analysis, the City identified physical constraints, engineering constraints, including legal constraints that affect or influence the physical placement of wastewater or stormwater management facilities.

The analysis includes a high planning level assessment of the relative degree of difficulty of providing public facilities and services. Early in the iterative multi-year analysis process, engineering and transportation staff, public service agency staff were asked to assign a numeric value ranging from 1-5 to assess and compare the relative degree of difficulty of providing public facilities and services to an area with 1= EASIER, 3=MEDIUM DIFFICULT, 5=DIFFICULT.⁴⁴ The relative rankings assigned were based on conceptual-level discussion of the wastewater, transportation, and stormwater improvements that would likely be needed to provide these public services to serve general areas, not individual parcels. Relative degree of difficulty addressed providing services to the edge of an area and did not include providing services internally within an area. These discussions and assessments were not based upon detailed analysis and are therefore subject to change. Cost of service was not estimated or evaluated at this point in the analysis.

The City relied on the findings in Table 5 —as further documented by referenced facility plans, maps and supplemental evidence in the record — to determine whether *potentially suitable* candidate second priority lands can be served with public water, wastewater, stormwater, and transportation including public transit systems within the 2010-2030 planning period based on physical constraints. In this step, the City excluded lands it deemed not serviceable based on physical constraints — and therefore not suitable — from further consideration in the UGB Alternatives Analysis.

The City's evaluation of alternatives and its conclusions regarding serviceability and thus suitability are based on a comparative analysis of physical facilities and services constraints that is appropriate for this level of planning. The City applied service comparison factors uniformly to the land under each priority. The City's conclusions regarding which lands to exclude are reasonable and supported by evidence.

⁴⁴ Draft Buildable Lands Inventory, 12/11/09 by City Engineer Ken Vogeney, input from Springfield Utility Board

Table 5: Second Priority Land Public Facilities and Services Analysis Summary	
McKenzie View B Exception Parcels:	
Water	<p>5 Difficult</p> <ul style="list-style-type: none"> isolated by distance and topography from existing urban services Separated from urban services by the McKenzie River, must cross river with urban services Would need to bore under river (if permitted) to extend public water service main Nearest water transmission line is a 24" line in the vicinity of 28th Street/Yolanda, approximately 6,000-8000 feet from the parcels
Wastewater	<p>5 Difficult</p> <ul style="list-style-type: none"> Isolated by distance and topography from existing urban services Separated from urban services by the McKenzie River, must cross river with urban services Nearest collection system is across the river and more than 2,000 feet away: a 15" line in Vera Street. Would need to upgrade Vera pump station. Would need to bore under river (if permitted) to extend service main, then gravity flow to East Springfield interceptor.
Stormwater	<p>3 Medium Difficult</p> <ul style="list-style-type: none"> Separated from urban services by the McKenzie River No developed system or outfalls in vicinity New stormwater outfalls will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands. The McKenzie River is federally classified as critical salmonid habitat.
Transportation (including transit service)	<ul style="list-style-type: none"> Isolated by distance and topography from existing urban services Access to exception parcels from Springfield and I-5 is via McKenzie View Drive, a Rural Minor Collector – approximately 4.5 miles from UGB at Game Farm Rd.; or across the McKenzie River via Marcola Rd. (Rural Major Collector, 46-36' wide), Old Mohawk Rd. (Rural Minor Collector), and Hill Rd. (Rural Minor Collector) - approximately 5 miles from UGB at Hayden Bridge. All roads will need improvement to accommodate industrial or commercial development and multi-modal access Upgrade McKenzie View Drive to urban standards and provide capacity improvements Marcola Road: "With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length."⁴⁵ No transit services, pedestrian facilities or ADA access in area. Same findings as Mohawk re upgrades to 42nd St., 42nd/Marcola intersection and 42nd and Hwy 126 interchange
Urban services conclusion/	The City excluded the McKenzie View Exception parcels from consideration because this areas does not provide and cannot reasonably be expected to be provided with

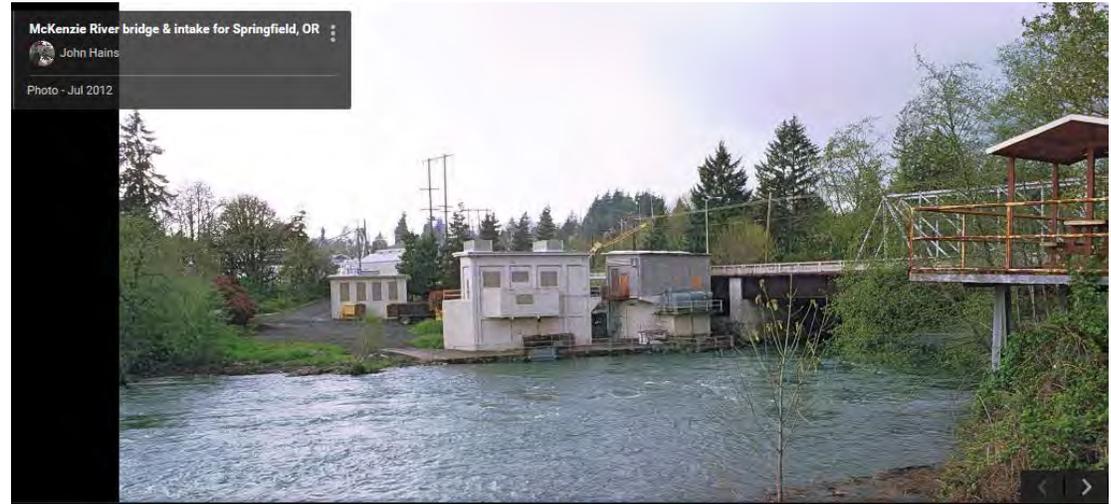
⁴⁵ Lane County Weight Restricted Bridges and Approved Route List (Revised 02-2014), <http://www.odot.state.or.us/forms/motcarr/od/4020.pdf>, website accessed 2-5-16

<p>physical constraints McKenzie View Exception</p>	<p>the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).</p>
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Mohawk A, B, and C Exception Parcels:

<p>Water</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • B and C are isolated by distance and topography from existing urban services • Separated from urban services by the McKenzie River, must cross river with urban services • River is a barrier to extension of water transmission that makes extension of public water system infeasible⁴⁶ • Nearest water transmission line is a 16” line at Marcola Rd. /Hayden Bridge
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Photos: EWEB Intake at Hayden Bridge and existing Hayden Bridge (Marcola Road crossing McKenzie)



⁴⁶ See email from City Civil Engineer Clayton McEachern P.E., to Linda Pauly, dated 2/8/16 describing physical constraints to extending a water transmission line across the McKenzie River either via the existing bridge or by boring underwater.

Wastewater	<p>5 Difficult</p> <ul style="list-style-type: none"> • B and C are isolated by distance and topography from existing urban services • Separated from urban services by the McKenzie River, must cross river with urban services • Will require pumping across the river and expanding capacity in existing sewer in Marcola Road (existing UGB). Geology precludes boring under river in this location. A line rupture in this location could contaminate Eugene’s water supply. • Would require new trunk line from North Springfield Interceptor to and along Hayden Bridge Rd and new pump stations inside area to get flow to new trunk. Bridge is high point. Pump stations are needed to bring flow up to bridge and across river, then gravity flow to interceptor. • Nearest collection system is a 10” line in Marcola Rd., more than 4,000 feet from Mohawk A, 3 miles to Mohawk B parcels, and 4 miles to Mohawk C parcels • Mohawk C parcels are located more than 2 miles from UGB
Stormwater	<p>5 Difficult</p> <ul style="list-style-type: none"> • Separated from urban services by the McKenzie River • No new outfalls permitted upstream from Hayden Bridge (Three Basin Rule⁴⁷) • Eugene Water and Electric Board’s water intake at Hayden Bridge would require significant separation from any new outfalls developed downstream from the intake⁴⁸ • No developed system in vicinity • Mohawk C parcels >2 miles from UGB
Transportation (including transit service)	<p>4 Difficult</p> <ul style="list-style-type: none"> • B and C are isolated by distance and topography from existing urban services • Access to exception parcels from Springfield is across the McKenzie River via 42nd Street and Marcola Rd. (Rural Major Collector, 46-36’ wide), Old Mohawk Rd. (Rural Minor Collector/Rural Local Collector, 30’ wide), and Camp Creek Rd. (Rural Major Collector, 30’ wide).^{49 50} Roads may need improvement to accommodate additional development and provide multi-modal access: <ul style="list-style-type: none"> • Upgrade 42nd St. to urban standards⁵¹ • Upgrade 42nd/Marcola intersection • May need to upgrade 42nd and OR 126 interchange⁵² • Upgrade Camp Creek to urban standards and provide capacity improvements • Would require internal collector street system. • Existing bridge in place, but would need to be improved to provide full urban standards including multi-modal access. • Urban standards and capacity improvements needed on existing and future collector

⁴⁷ OAR 340-041-0350(1)(b) prohibits new or increased waste discharges that require NPDES permit, WPCF permit, or 401 Certification to the waters of the McKenzie River Subbasin above the Hayden Bridge (river mile 15).

⁴⁸ See email from City Civil Engineer Clayton McEachern P.E., describing physical factors that preclude construction of new stormwater outfalls in the vicinity of EWEB’s Hayden Bridge McKenzie River water intake facility.

⁴⁹ Source of Functional Classifications: 2004 Lane County Transportation System Plan Functional Class Subarea 14 Map 4-14

⁵⁰ Source of road widths: Lane County Roads Inventory,

http://www.lanecounty.org/Departments/PW/TransPlanning/Documents/AppendixB_RoadsInventory.pdf

Accessed January 26, 2016

⁵¹ Project # R-41 42nd St. from Marcola Rd. to railroad tracks is listed as a “20-year priority project” in the Springfield 2035 TSP Attachment A.

⁵² See ODOT staff Helton email to staff Reesor, Dec. 29, 2008: “The interchange on Hwy 126 at 42nd St. has failing segments even with planned improvements, but it can probably be made to operate with additional improvements to the local system.” Project #R-35 is identified as a “Beyond 20-year Project” in the 2035 Springfield TSP, Appendix A, p. 14.

	<p>system from Mohawk/Highway 126 interchange to area, including Hayden Bridge Rd, 19th St, 23rd St, and 31st St</p> <ul style="list-style-type: none"> • Previous ODOT study showed a need for upgrading at Hwy 126 and 42nd St. (without UGB expansion). Traffic backs up at the 42nd St. rail crossing at entrance to the IP plant, causing delays with access to Hwy 126. • Isolated from I-5 interchange. Mohawk A parcels are located 1 mile from Highway 126/I-105, and 5 miles from I-5; Mohawk C parcels >2 miles from UGB • Steep slopes east of Marcola Rd. • Access to Mohawk A, B and C would route traffic through farmland and rural residential areas • Marcola Road and Old Mohawk Road: “With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length.”⁵³ • No transit services, pedestrian facilities or ADA access in area. Nearest service is Route 17 Hayden Bridge Rd. and 19th Street. Route Description: “The route begins at Springfield Station (Bay B) and travels North on 5th Street where it serves Springfield City Hall and Library and the Fred Meyer Shopping Center. The bus travels East on Hayden Bridge Place, North on 7th Street, West on Hayden Bridge Road, and South onto 19th Street where it serves Mohawk Marketplace. The bus travels West on Q Street and South on 5th Street to return to Springfield Station.”⁵⁴
<p>Urban services conclusion/ physical constraints Mohawk Exception</p>	<p>The City excluded the Mohawk Exception parcels from consideration because these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in 660-009-0005(9).</p>
<p>Oxbow/Camp Creek Exception Parcels</p>	
<p>Water</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Separated from urban services by the McKenzie River, must cross river with urban services • Nearest water transmission line is a 16” line Marcola Rd. /Hayden Bridge • River is a barrier to extension of water transmission that makes extension of public water system infeasible⁵⁵ • Same findings as Mohawk

⁵³ Lane County Weight Restricted Bridges and Approved Route List (Revised 02-2014), <http://www.odot.state.or.us/forms/motcarr/od/4020.pdf>, website accessed 2-5-16.

⁵⁴ Email from LTD staff Will Mueller, dated June 28, 2013 provides comments describing the physical requirements necessary to provide transit service applicable to extending transit service to any new areas: “Connecting roadways and streets would need to be constructed to city standards that support LTD’s buses including sufficient lane width, intersection curb radii, and sidewalk width at prospective bus stops to meet ADA standards in effect at time of construction (2013 standards require 8’ sidewalks at bus stops).

⁵⁵ See email from City Civil Engineer Clayton McEachern P.E., to Linda Pauly, dated 2/8/16 describing physical constraints to extending a water transmission line across the McKenzie River either via the existing bridge or by boring underwater.

<p>Wastewater</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Separated from urban services by the McKenzie River, must cross river with urban services • Would require pumping across the river and expanding capacity in existing sewer in Marcola Road (existing UGB). Geology precludes boring under river in this location. • EWEB intake at Hayden Bridge is the intake for the City of Eugene’s water supply. • Would require new trunk line from North Springfield Interceptor to and along Hayden Bridge Rd and new pump stations inside area to get flow to new trunk. Bridge is high point. Pump stations are needed to bring flow up to bridge and across river, then gravity flow to interceptor. • Nearest collection system is a 10” line in Marcola Rd., more than 4,000 feet from Hayden Bridge, and approximately 6,000 feet to the westernmost parcel. • Eastern Camp Creek parcels approximately 5 miles from nearest wastewater connection via Hayden Bridge/Marcola Rd. or via Hendricks Bridge/Main Street. • Same findings as Mohawk
<p>Stormwater</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • Separated from urban services by the McKenzie River • No new outfalls permitted upstream from Hayden Bridge (Three Basin Rule)⁵⁶ • EWEB intake at Hayden Bridge is the intake for the City of Eugene’s water supply. • No developed system or existing discharge permits in vicinity • Same findings as Mohawk are applicable
<p>Transportation (including transit service)</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Access to exception parcels from Springfield and I-5 is across the McKenzie River via Marcola Rd. (Rural Major Collector, 46-36’ wide), Old Mohawk Rd. (Rural Minor Collector/Rural Local Collector, 30’ wide), and Camp Creek Rd. (Rural Major Collector, 30’ wide). Roads may need improvement to accommodate additional development and multi-modal access: • Upgrade 42nd St. to urban standards • Upgrade 42nd/Marcola intersection • Upgrade 42nd and Hwy 126 interchange • Upgrade Camp Creek to urban standards and provide capacity improvements • Would require internal collector street system • Marcola Road: “With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length.”⁵⁷ • No transit services, pedestrian facilities or ADA access in area. • Same findings as Mohawk are applicable
<p>Urban services conclusion: Oxbow/Camp</p>	<p>The City excluded the Oxbow/Camp Creek Exception parcels from consideration because these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation</p>

⁵⁶ OAR 340-041-0350(1)(b) prohibits new or increased waste discharges that require NPDES permit, WPCF permit, or 401 Certification to the waters of the McKenzie River Subbasin above the Hayden Bridge (river mile 15).

⁵⁷ Lane County Weight Restricted Bridges and Approved Route List (Revised 02-2014), <http://www.odot.state.or.us/forms/motcarr/od/4020.pdf>, website accessed 2-5-16

Creek Exception	infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).
Jasper Bridge Exception Parcels	
Water	<p>A: 5 Difficult B: 4 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Must cross Willamette River with urban services to serve Jasper Bridge A (west side) parcels. • The nearest water transmission line is 2-3 miles from the exception parcels: the 24” “Natron” water line, extended in 2013 to the SW corner of the school district property. The 16” line at Westwind/Linda Lane provides a looped system. • A planned 24” line will extend south from Weyerhaeuser Haul Rd. to serve the SE portion of the UGB.
Wastewater	<p>5 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • The nearest sewer is 2-3 miles from these parcels. The Jasper Trunk terminus at S. 57th is a 12” main. Nearest 27” main is at 42nd St. Multiple pump stations would be needed, or a new treatment facility if permitting would allow. • Would require pump stations and trunk line extensions to cross Willamette River to serve west side parcels. • Jasper trunk sewer may not have adequate capacity to serve industrial uses, so a new parallel trunk may be necessary • May be more feasible to serve from Pleasant Hill if a public collection/treatment system is developed for that area in the future • Geology may allow boring under river in this location
Stormwater	<p>2 Easier</p> <ul style="list-style-type: none"> • Physical connections to the Middle Fork Willamette River system can be made with little or no impact on existing stormwater systems. This area would be a new basin. • Development of the area may require land acquisition to safely convey stormwater runoff to the river. • Would require new outfall(s) to Willamette River. • New stormwater outfalls will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands. • The Middle Fork Willamette River is federally classified as critical salmonid habitat.
Transportation (including transit service)	<p>5 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Access from Jasper Road but urban standards and capacity improvements would be necessary.⁵⁸ • Topography limits expansion of Jasper Rd.

⁵⁸ Project #US-12 Jasper Road-South 42nd Street to northwest of Mt. Vernon Road, and Project # US-13 Bob Straub Parkway – Mt. Vernon Rd to UGB are identified as a “Beyond 20-year Projects,” TSP Projects Located on Lane CO Facilities list, in the 2035 Springfield TSP, Attachment A.

	<ul style="list-style-type: none"> • West side parcels: The existing 1952 metal truss Jasper Bridge⁵⁹ has low service life and would need to be upgraded or replaced to handle increased traffic generation and to provide multi-modal access to Jasper Bridge A west side parcels. • Connection to Hwy 58 but limited connection to Hwy 126/I-5 • Need to further study capacity at the I-5/Hwy 58th interchange. Improvements may be needed depending on size and location of expansion area.”^{60,61} • Access to west side parcels would route traffic through existing rural residential development on Edenvale Rd. • County facilities Jasper – Lowell Road, Jasper Rd. and Hills Creek Road: “With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length.”⁶² • Needs internal collector system • “Main St/Straub Parkway intersection is failing today even with planned interchange improvements”, and there are safety issues with signal. Traffic would need to be distributed differently. Significant development would need to participate in funding of ODOT IAMP. Impacts to the OR126/Main St intersection should be considered. ODOT’s previous analysis indicate that the OR 126/Main St, Main St/54th St. and Main St/58th St all exceed capacity by 2031.^{63 64} • Bob Straub Parkway – Mt. Vernon to UGB needs to be improved to a three-lane cross section with sidewalks and bike facilities.⁶⁵ • No pedestrian facilities or ADA access in area. • Nearest public transit service is at Thurston Station on Main Street, >3 miles away.⁶⁶
<p>Urban services conclusion: Jasper Bridge Exception</p>	<p>The City excluded the Jasper Bridge Exception parcels from consideration because these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).</p>

⁵⁹ Jasper Bridge (ODOT 04117A) is identified in the ODOT 2015 Bridge Condition Report as “Low Service Life”, a candidate for repair or replacement; bridge #07890 at MP 5.64 has timber substructure deficiencies.

⁶⁰ Comments received from ODOT Region 2, Area 5 staff Savannah Crawford, email dated June 18, 2013.

⁶¹ Interchange improvements at Main St/Hwy 126 and Highway 126 at 52nd are listed as financially constrained projects in the Regional Transportation Plan (RTP).

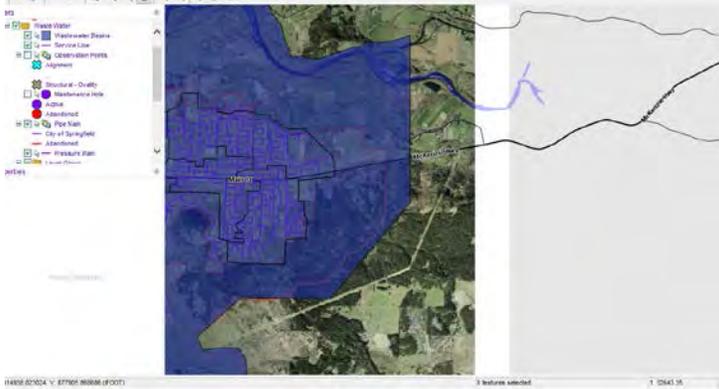
⁶² Lane County Weight Restricted Bridges and Approved Route List (Revised 02-2014), <http://www.odot.state.or.us/forms/motcarr/od/4020.pdf>, website accessed 2-5-16

⁶³ Comment received ODOT staff Crawford, meeting on June 11, 2013 and email dated June 18, 2013.

⁶⁴ Project #R-58 OR 126/52nd St Interchange Improvements and #R-59 and R-43 OR 126/Main Interchange Improvements are identified as “20-year Priority Projects” in the 2035 Springfield TSP, Attachment A, p.9. Est. cost of #43 is 50 million.

⁶⁵ Project #US-13 is identified as a “Beyond 20-year Project,” list of TSP Projects Located on Lane CO Facilities, Springfield 2035 TSP, Attachment A.

⁶⁶ Email from LTD staff Will Mueller, dated June 28, 2013 provides comments describing the physical requirements necessary to provide transit service applicable to extending transit service to any new areas: “Connecting roadways and streets would need to be constructed to city standards that support LTD’s buses including sufficient lane width, intersection curb radii, and sidewalk width at prospective bus stops to meet ADA standards in effect at time of construction (2013 standards require 8’ sidewalks at bus stops).

Far East Exception A and B Parcels	
Water	<p>A: 1 Easier</p> <ul style="list-style-type: none"> The nearest transmission line is the 12" line terminating ½ mile east of the existing UGB on Main St/Hwy 126, approximately ½ mile from exception parcel 1702336241500. <p>B: 5 Difficult</p> <ul style="list-style-type: none"> Separated from urban services by distance and topography. The nearest transmission line is the 12" line terminating ½ mile east of the existing UGB on Main St/Hwy 126. Distant from SUB service area. Higher elevation would require pumping and reservoir.
Wastewater	<p>A: 1 Easier</p> <p>B: 5 Difficult - Separated from urban services by distance and topography.</p> <ul style="list-style-type: none"> May require a new pump station at bottom of Cedar Flat/126 and force main to bring gravity flow to Thurston trunk sewer. May need to be a stepped system to address topography. New or upgrade trunk line may be needed in Thurston Rd. from North Springfield interceptor at International Paper (unfunded upgrade project is identified in CIP). Steep slopes south of McKenzie Hwy/Main St.  <p>City of Springfield wastewater basin (shown in blue) and service main in relationship with Far East, Thurston and Oxbow/Camp Creek areas</p>
Stormwater	<p>A: 3 Medium Difficult</p> <p>B: 5 Difficult</p> <ul style="list-style-type: none"> No developed system in vicinity Cedar Creek drainage basin is nearing stormwater receiving capacity^{67, 68} (unfunded upgrade project is identified in CIP). No new outfalls permitted on McKenzie River upstream from Hayden Bridge (Three Basin Rule)⁶⁹

⁶⁷ City of Springfield Stormwater Facilities Master Plan, Oct. 2008; City of Springfield Stormwater Management Plan, updated 2010, <http://springfield-or.gov/ESD/stormwater%20management%20plan%202008.pdf>, accessed 2/8/16.

⁶⁸ City of Springfield Stormwater Basin Characterization Study, Lane Council of Governments, 2008, pp. 17-26 describes existing outfalls and water quality concerns in this basin.

⁶⁹ OAR 340-041-0350(1)(b) prohibits new or increased waste discharges that require NPDES permit, WPCF permit, or 401 Certification to the waters of the McKenzie River Subbasin above the Hayden Bridge (river mile 15). The McKenzie supports anadromous and resident fish species and is considered "essential fish habitat" for threatened and endangered species (Table 11, p. 20).

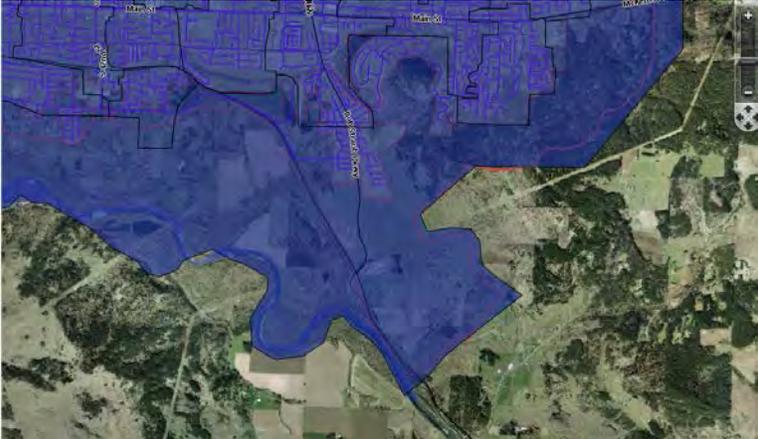
	<ul style="list-style-type: none"> • Sensitive environmental protection/salmonid species habitat restoration projects will limit/restrict new outfalls • Ability to manage stormwater on-site will be limited by high water table and typically⁷⁰ requires 8-10% of parcel area.
<p>Transportation (including transit service)</p>	<p>A: 1 Easier B: 5 Difficult. Separated from urban services by distance and topography.</p> <ul style="list-style-type: none"> • Access to A and B from E. Main Street/McKenzie Hwy (State Highway) and Thurston Road (Rural Major Collector). • Two new bridges would be needed over Cedar Creek on 66th and Weaver Lane. • 66th St., Weaver Lane and Billings Rd. would require urban standards improvements and capacity upgrades. • Extend Billings Rd. to E. Main St. • Upgrade capacity on 66th St. from Main St. to Thurston Rd. • Upgrade capacity on Thurston Rd. and provide urban standards from 69th St. to E. Main Street • Improve Thurston Rd between Weaver Rd. and UGB⁷¹ • Intersection improvements at Thurston Rd. and E. Main St. • Would need internal collector street system • Access to Exception C from Cedar Flat Road, Rural Local Collector • slopes between E. Main Street/McKenzie Hwy and parcels limit constrain options • “Main St/Straub Parkway intersection is failing today even with planned interchange improvements”, and there are safety issues with signal. Traffic would need to be distributed differently. Significant development would need to participate in funding of ODOT IAMP. Impacts to the OR126/Main St intersection should be considered. ODOT’s previous analysis indicate that the OR 126/Main St, Main St/54th St. and Main St/58th St all exceed capacity by 2031.^{72, 73}
<p>Urban services conclusion: Far East Exception</p>	<p>Far East Exception A parcels were considered physically serviceable during the 20-year planning period ending 2030, as defined in OAR 660-009(9). The relative proximity of the easternmost parcels in this area to existing water, wastewater and transportation facilities suggests that water and wastewater facilities could be extended or upgraded to have adequate capacity within the 20-year planning period. The City excluded the Far East Exception B parcels from consideration because this area does not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as</p>

⁷⁰ Eugene Stormwater Management Manual “Simplified Method”, Appendix C, is a rule of thumb Springfield engineers use for typical small developments.

⁷¹ Project #US-14 is identified in the 2030 Springfield TSP as a Priority Project on the 20-year project list, Projects on Lane CO. Facilities, Attachment A, with an estimated cost of \$4,800,000.

⁷² Comment received ODOT staff Crawford, meeting on June 11, 2013 and email dated June 18, 2013.

⁷³ Interchange improvements at Main St/Hwy 126 and Highway 126 at 52nd are listed as financially constrained projects in the Regional Transportation Plan (RTP) and are identified as 20-year Priority Projects in the 2035 Springfield TSP, Attachment A .

	defined in OAR 660-009-0005(9).
Wallace Creek Exception Parcels	
Water	<p>5 Difficult</p> <ul style="list-style-type: none"> • Separated from urban services by distance and topography. • Exception parcels are located more than 3 miles from the nearest water main. • The nearest water transmission line is the 24" "Natron" water line, extended in 2013 to the SW corner of the school district property. The 16" line from Westwind/Linda Lane provides a looped system. • A planned 24" line will extend south from Weyerhaeuser Haul Rd. to serve the SE portion of the UGB. • Wallace Creek Rd. narrow, winding corridor alignment and topography preclude infrastructure extensions. Extension along Weyerhaeuser Haul Road alignment may be a possible alternative. • No developed system in vicinity
Wastewater	<p>4 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • No developed system in vicinity. • Wallace Creek Rd. narrow, winding corridor alignment and topography preclude infrastructure extensions. Extension along Weyerhaeuser Haul Road alignment may be a possible alternative to serve parcels in Haul Road area. • The nearest sewer is 2-3 miles from the parcels. The Jasper Trunk terminus at S. 57th is a 12" main. Nearest 27" main is at 42nd St. • It is anticipated one or two additional small pump stations may be needed to serve some portions of the area depending upon future development configuration and topography. • Jasper trunk sewer may not have adequate capacity to serve additional industrial uses, so a new parallel trunk may be necessary. <div style="display: flex; align-items: flex-start;"> <div style="width: 25%; border: 1px solid gray; padding: 5px; margin-right: 10px;"> <p>Layers</p> <ul style="list-style-type: none"> <input type="checkbox"/> Infrastructure <input type="checkbox"/> Hydrants <input type="checkbox"/> Waste Water <input type="checkbox"/> Wastewater Basins <input type="checkbox"/> Service Line <input type="checkbox"/> Observation Points <input type="checkbox"/> Alignment <input type="checkbox"/> Structural - Quality <input type="checkbox"/> Maintenance note <input type="checkbox"/> Access <input type="checkbox"/> Abandoned <input type="checkbox"/> Pipe Main <input type="checkbox"/> City of Springfield <p>Properties</p> </div>  </div> <p>City of Springfield wastewater basin (shown in blue) and service main in relationship with Wallace Creek, South Hills, West Jasper Mahogany, and Jasper Bridge areas</p>
Stormwater	<p>5 Difficult</p> <ul style="list-style-type: none"> • Upgrade existing Wallace Creek outfall to Middle Fork Willamette River • No developed system in vicinity • Physical connections to the Middle Fork Willamette River system can be made with little or no impact on existing stormwater systems. • Development of the area will require land acquisition to safely convey stormwater runoff to the river if lands are not bordering Wallace Creek • New stormwater outfalls will involve several other regulatory agencies because the

	<p>work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands.</p> <ul style="list-style-type: none"> • Stormwater management through the use of on-site retention and/or infiltration would be challenging given the sloped topography and location relative to Springfield Utility Board’s Willamette well field. • The Middle Fork Willamette River is federally classified as critical salmonid habitat.
<p>Transportation (including transit service)</p>	<p>3 Medium Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Access limited to one way in/out • Existing rail crossing at Jasper Rd/Wallace Creek Rd. is substandard. Upgrade would be needed. An at-grade crossing may not be feasible in this location. Existing traffic waiting to cross backs into Jasper Rd. 24 trains/day. • Wallace Creek Road will need improvement to urban standards. The existing narrow, winding alignment through sloped topography is a constraint. • DOGAMI SLIDO mapped landslide hazard area • Access via Jasper Rd., but urban standards and capacity improvements needed⁷⁴: Improvement of the entire length of Jasper Road to urban standards and upgrade to 4 lanes to Main Street via South 42nd Street, including Union Pacific mainline crossing upgrades on South 42nd Street and intersection upgrades along the length of the entire corridor. • Topography limits expansion of Jasper Rd. • May trigger capacity improvements (4-lane section) for Bob Straub Parkway: Improvements to Bob Straub Parkway from Jasper Road to Daisy Street, upgrading to 4 lanes. • Intersection improvements will be needed at Bob Straub Parkway and Daisy Street.⁷⁵ • Jasper Rd. & Straub Parkway: “With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length.” • Intersection improvements will be needed at Bob Straub Parkway and Jasper Road, which will include a new traffic signal. • A new road connection from Bob Straub Parkway to Jasper Road will be needed in the vicinity of the Webb property (Tax Lot 1802090000103), which will include a new grade separated crossing over the railroad. • Connection to Hwy 58 but limited connection to Hwy 126/I-5 • Need to further study capacity at the I-5/Hwy 58th interchange. Improvements may be needed depending on size and location of expansion area.”⁷⁶ • Nearest transit service is at Thurston Station on Main Street, >3 miles away.⁷⁷ No transit services, pedestrian facilities or ADA access in area. • “Main St/Straub Parkway intersection is failing today even with planned interchange improvements”, and there are safety issues with signal. Traffic would need to be distributed differently. Significant development would need to participate in funding of ODOT IAMP. Impacts to the OR126/Main St intersection should be considered.

⁷⁴ See Jasper Bridge exception area

⁷⁵ Project #R-44 is identified as a “Beyond 20-year Project” in the 2035 Springfield TSP

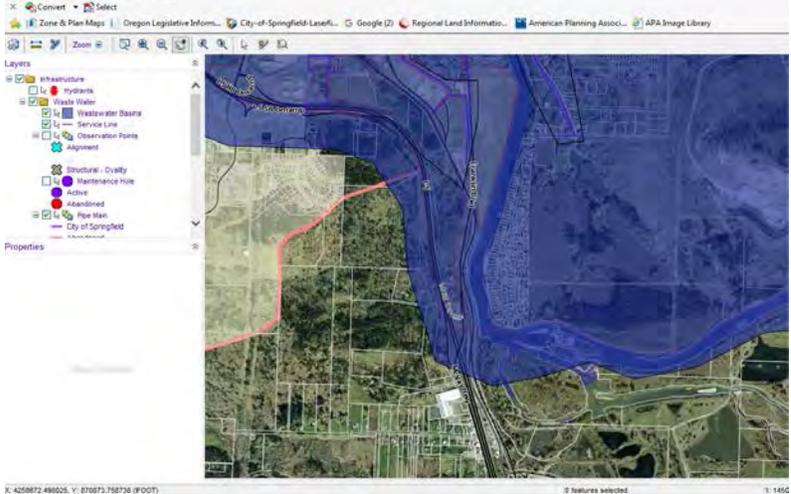
⁷⁶ Comments received from ODOT Region 2, Area 5 staff Savannah Crawford, email dated June 18, 2013.

⁷⁷ Email from LTD staff Will Mueller, dated June 28, 2013 provides comments describing the physical requirements necessary to provide transit service applicable to extending transit service to any new areas: “Connecting roadways and streets would need to be constructed to city standards that support LTD’s buses including sufficient lane width, intersection curb radii, and sidewalk width at prospective bus stops to meet ADA standards in effect at time of construction (2013 standards require 8’ sidewalks at bus stops).

	<p>ODOT's previous analysis indicate that the OR 126/Main St, Main St/54th St. and Main St/58th St all exceed capacity by 2031.^{78, 79}</p>
<p>Urban services conclusion: Wallace Creek Exception</p>	<p>The City excluded the Wallace Creek exception parcels from consideration because the area does not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses in this location. Providing service to the area will present significant challenges not only in the length of improvements, but also the multiple at grade railroad crossings that will likely be needed along Jasper Road and Wallace Creek Rd. In addition, Jasper Road will likely need to be upgraded to provide capacity for employment development. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield's identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).</p>
<p>Seavey Loop Exception B, C and E Parcels: Second Priority</p>	
<p>Water</p>	<p>3 Medium Difficult</p> <ul style="list-style-type: none"> • Existing public rural water system and service provided by Willamette Water Company • Exception B, C and E parcels are located more than 2 miles from the nearest SUB water main, a 16" line in McVay.
<p>Wastewater</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • No developed system in vicinity • Isolated by distance and topography from existing urban services • Would require sewer extension from the Franklin/McVay trunk 18" line in Glenwood • B: 2 miles to serve the parcel at south end of College View; C: 2.4 miles to serve Twin Buttes parcels; E: 1.75 miles to 2 miles to serve So. Franklin parcels • Would require upgrades to existing Glenwood MWMC pump station • Would require a new small sized wastewater pump station located near the intersection of 30th Avenue and College View Road. • Would require a new wastewater gravity/pressure main extension from the new pump station at 30th Avenue and College View Road to a new pump station in the vicinity of the intersection of Seavey Loop and Franklin Boulevard, and a gravity main extension along College View Road southerly, ending near the intersection with Franklin Boulevard in order to serve existing properties. • Would require a new small sized wastewater pump station located near the intersection of Franklin Boulevard and Twin Buttes Road. • Wastewater service to this area could become feasible in the future beyond the planning period, however given its removed location from the rest of Springfield, and the number of new pump stations that will likely be needed to provide service, there will be long-term operational costs associated with providing service to this area.

⁷⁸ Comments received from ODOT staff Crawford, meeting on June 11, 2013 and email dated June 18, 2013.

⁷⁹ Interchange improvements at Main St/Hwy 126 and Highway 126 at 52nd are listed as financially constrained projects in the Regional Transportation Plan (RTP).

	 <p>City of Springfield wastewater basin (shown in blue) and service main in relationship with Seavey Loop study area</p>
<p>Stormwater</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Physical connections to Oxley Slough and/or the Coast Fork Willamette River can be made with little or no impact on existing stormwater systems, although the connection locations may need to be outside of the proposed expansion area. • New stormwater outfalls to Oxley Slough and/or the Coast Fork Willamette River receiving waters will involve several other regulatory agencies because the work would affect riparian areas, excavation in the waters of the state and waters of the United States, and potential wetlands. • While the Coast Fork Willamette River is not federally classified as critical salmonid habitat, the State has designated the Coast Fork Willamette River as essential salmonid habitat. • Stormwater management through the use of on-site retention and/or infiltration may be allowable in this area as it is outside of the zone of contribution for Springfield Utility Board’s wells and no other wellhead protection zones have been identified to our knowledge. • Considering the multiple overlapping regulatory jurisdictions for constructing new stormwater outfalls into the Coast Fork Willamette River and/or Oxley Slough, stormwater service for this area may be feasible if on-site stormwater management techniques that maximize stormwater retention and infiltration are required.
<p>Transportation (including transit service)</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • Proximate to I-5, but access is indirect and limited by the awkward connection and limited capacity at Franklin and 30th Ave. interchange. Access to I-5 at south end is underneath the freeway, via Highway 58/Goshen interchange. • Limited capacity at I-5/30th Street interchange. “Need to further study capacity at the I-5/30th Street interchange and the I-5/Hwy 58th interchange. Improvements at one or both locations may be needed depending on size and location of expansion area.”⁸⁰

⁸⁰ Comments received from ODOT Region 2, Area 5 staff Savannah Crawford, email dated June 18, 2013.

- City staff identified a need for an Extension of 30th Avenue as a grade separated to the intersection with Franklin Boulevard and Seavey loop near the southeast corner of the EPUD property. This excludes I-5 interchange improvements or upgrades.⁸¹
- City staff identified a need for the north end of Seavey Loop Rd. to be reconfigured to terminate South of Franklin Boulevard (North of EPUD).
- Existing rail underpass at Franklin is very narrow and restricts truck passage.
- Opportunities for rail access are unlikely, given the existing infrastructure configuration, lack of siding and narrow width and depth of parcels
- Isolated from urban transportation system
- May trigger capacity improvements for McVay Highway in Glenwood
- Service to this area may be feasible, however there are expected to be some challenges surrounding the 30th Avenue extension and potential for interchange improvements at Interstate 5.
- “Difficult to serve with transit except via one-directional route variation from current #92 Lowell/LCC route which only runs 3 trips per weekday.”⁸² No pedestrian facilities or ADA access in area.



I-5, Franklin, and rail overpass at northern entrance to Seavey Loop area

⁸¹ At a meeting of the College View Stakeholder Working Group meeting, ODOT staff David Helton stated that the existing 30th Ave. interchange would likely be sufficient to accommodate traffic from future development in the study area concept (as mapped on that date).

⁸² Comments from meeting with Lane Transit District staff Evans, Schwetz, Luftig and ODOT staff Crawford, June 11, 2013.



I-5/30th ramp, Franklin Blvd., College View Rd. and railroad corridor

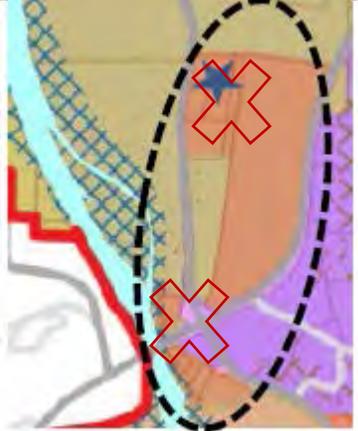
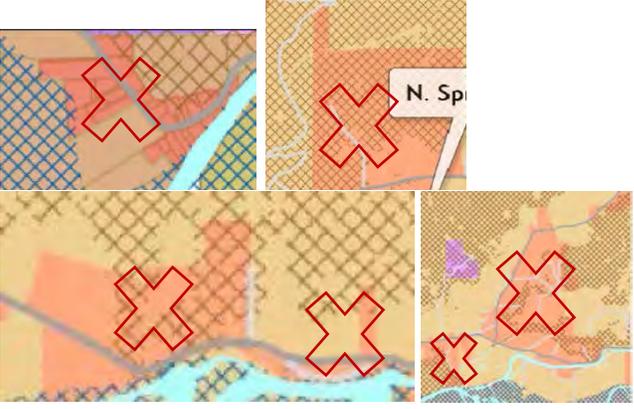
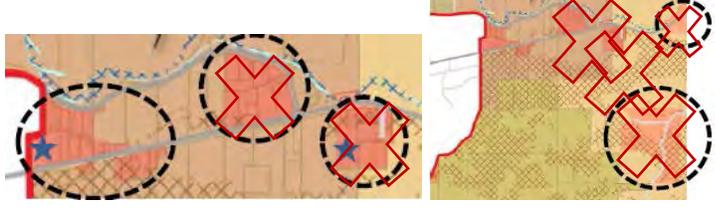
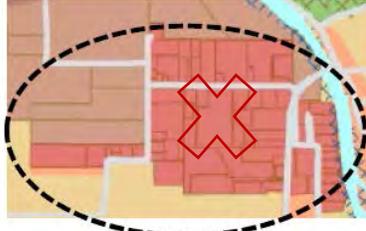


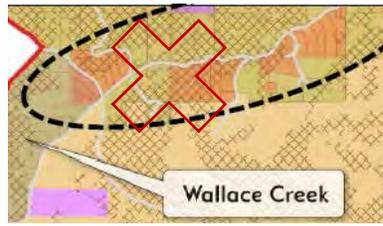
Access to I-5 is via South Franklin/Hwy 99, under I-5 overpass, and via Hwy 58 ramp

Urban services conclusion:
Seavey Loop Exception B, C and E

The City excluded the **Seavey Loop B, C and E** exception parcels from consideration because these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield's identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).

Table 6: Second priority exception parcels excluded: public facilities constraints [ORS 197.298(3)(b)]

<p>McKenzie View B</p> 	<p>Mohawk A</p> 	<p>Mohawk B</p> 
<p>Mohawk C</p> 	<p>Oxbow/Camp Creek</p> 	
<p>Far East Springfield B</p> 	<p>Jasper Bridge A</p> 	

<p>Jasper Bridge B</p> 	<p>Seavey Loop B</p> 	<p>Seavey Loop C</p> 
<p>Seavey Loop E</p> 		<p>Wallace Creek</p> 

In addition to the summary data compiled in Table 5, the record includes studies, facilities master plans, maps, documentation from engineering staff and service providers, demonstrating that the City uniformly evaluated and compared ability to provide urban services to all potentially suitable exception parcels when it identified potentially suitable ORS 197.298 second priority exception land parcels; and that the City conducted the public services analysis in coordination with service providers, including the Oregon Department of Transportation with regard to impacts on the state transportation system.

In addition to the summary data compiled in Table 5, the record includes studies, facilities master plans, maps, documentation from engineering staff and service providers, demonstrating that the City uniformly evaluated and compared ability to provide urban services to all potentially suitable exception parcels all exception parcels as the factual basis to justify excluding ORS 197.298 second priority exception land parcels from further analysis.

Although second priority areas McKenzie View A, West Jasper/Mahogany, Clearwater, Seavey Loop A, D, F, and Seavey Loop/Goshen exception parcels were excluded from further consideration under OAR 660-009-0005(12) above (in Table 4), because they lacked the appropriate site characteristics, areas McKenzie View A, West Jasper/Mahogany, Seavey Loop A, D, F, and Seavey Loop/Goshen exception parcels could

also be dismissed under the public services analysis because providing water, sewer, stormwater and transportation facilities and service would be physically infeasible in the planning period 2010-2030.

Exception areas excluded based upon specific land needs (197.298(3)(a)) in a previous step: **McKenzie View A*, West Jasper/Mahogany*, Clearwater*, Seavey Loop A*, Seavey Loop D*, Seavey Loop F*, Seavey Loop/Goshen***

Exception areas excluded based upon based upon specific land needs and inability to reasonably provide urban services due to physical constraints (197.298(3)(b)): **Mohawk A, B and C; Oxbow/Camp Creek; Jasper Bridge A and B; Far East B; Wallace Creek; Seavey Loop B, C and E**

After excluding exception areas based upon based upon specific land needs and inability to reasonably provide urban services due to physical constraints (197.298(3)(a) and (b)), one *potentially* suitable and serviceable exception area remains a candidate for UGB expansion: **Far East A**. As shown in Table 7, this area has 2 parcels 5 acres or larger, a total of 13.3 acres. These parcels are not contiguous to one another.

**Table 7:
Potentially Suitable & Serviceable Second Priority Exception Land Parcels**

Area	# of parcels 5+ ac adjacent to UGB	# of parcels 20+ ac *	# of parcels 5+ ac*	Parcels and unconstrained acres	Zoning
Far East A	2	0	2	1702362401500; 6.4 acres 1701312001500; 6.9 acre slopes <15%, developed residential use, *entire property is sloped >12% ⁸³	RR2 RR2



Star indicates 5-acre residential parcels

The City relied on the findings in Table 5 —as further documented by referenced facility plans, maps and supplemental evidence in the record — to determine whether *potentially suitable* candidate second priority lands can be served with public water, wastewater, stormwater, and transportation including public transit systems within the 2010-2030 planning period based on physical constraints. In this step,

⁸³ According to RLID, the mapped NRCS soil series for this parcel is “43E Dixonville-Philomath-Hazelair complex, 12 to 35% slopes

the City excluded lands it deemed not serviceable based on physical constraints — and therefore not suitable — from further consideration in the UGB Alternatives Analysis.

The City’s evaluation of alternatives and its conclusions regarding serviceability and thus suitability are based on a comparative analysis of physical facilities and services constraints that is appropriate for this level of planning. The City applied service comparison factors uniformly to the land under each priority. The City’s conclusions regarding which lands to exclude are reasonable and supported by evidence.

At this point in the analysis, the City identified two *potentially* suitable first priority land parcels that are physically serviceable within Preliminary Study Area Grouping Far East A, but had not yet evaluated the area through the lenses of Goal 14 Location Factors 3 and 4.

At this point in the analysis, the City determined that the amount of suitable land in the first priority category would not be sufficient to meet the employment land deficiency. The City determined that the need for sites 20 acres and larger cannot be met on second priority land. The City identified two exception parcels in Far East A that are potentially suitable and serviceable to meet need for 5-acre sites if services can be provided within the planning period.

To continue its evaluation of *potentially* suitable exception and land sites to satisfy the employment land need deficiency, the City applied Goal 14 Location Factors 3 and 4. The amount and type of *potentially* suitable first priority land parcels does not exceed the amount necessary to satisfy the need deficiency. The City applied Goal 14 Location Factors 3 and 4 to evaluate *potentially* suitable exception and land sites to satisfy the employment land need deficiency.

OAR 660-024-0060(1)

“(b) If the amount of suitable land in the first priority category exceeds the amount necessary to satisfy the need deficiency, a local government must apply the location factors of Goal 14 to choose which land in that priority to include in the UGB.”

ORS 197.298 (1)(b) Goal 14 Location Factor 3 – Second Priority Lands Analysis

To continue its evaluation of *potentially* suitable exception and land sites to satisfy the employment land need deficiency, the City applied Goal 14 Factor 3 to evaluate the Far East A area exception parcels based on comparative ESEE consequences (Goal 14, Boundary Location, Factor 3), and based on compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4).

As previously noted, DLCD staff Gordon Howard provided an outline of the steps to be followed to exclude or include land:

- Exclude lands that are not buildable⁸⁴

⁸⁴ “Buildable” is a Goal 10 term. It is the City’s position that OAR 660-024-0060 (1) requires the City to consider whether sites are “suitable” at this “buildable” stage in the evaluation process.

- Exclude lands based upon specific land needs (197.298(3)(a));
- Exclude lands based upon inability to reasonably provide urban services due to physical constraints (197.298(3)(b));
- Include lower priority lands needed to include or provide services to urban reserve lands (197.298(3)(c));
- **Exclude lands based upon analysis of comparative ESEE consequences (Goal 14, Boundary Location, Factor 3);**
- **Exclude lands based upon analysis of compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4)**

The City addressed Goal 14 Location Factor 3 as part of the ORS 197.298 evaluation process after making a determination of which exception parcels were potentially suitable based on their size and lack of constraints, and after identifying potentially suitable parcels within a given geographic area grouping that could reasonably be serviceable by 2030. Goal 14 Location Factor 3 requires the City to make a determination that exception area parcels of land selected to be included in an urban growth boundary (UGB) will result in better environmental, social, energy, and economic (ESEE) consequences than the other exception lands of equal priority considered in this step and other alternative sites that were considered for inclusion and rejected. The following section of this report addresses the first application of Goal 14 Location Factor 3 to second priority land parcels considered for inclusion in the UGB.

Under a Goal 14 Factor 3 analysis regarding public facilities and services, a local government may consider relative difficulty and cost differences between urbanizing alternative sites and may consider whether the amount of potentially suitable land within a geographic area could reasonably justify the extension of public infrastructure.

McKenzie View, Oxbow/Camp Creek, Mohawk, West Jasper/Mahogany, East Springfield, Wallace Creek, Jasper Bridge, Clearwater, and Seavey Loop were excluded from further consideration for inclusion in the UGB based on physical constraints that preclude serviceability. It is important to note that although the City did not exclude these lands on the basis of comparative environmental, social, energy, and economic (ESEE) consequences, all of these excluded lands would be excluded under Goal 14 Location Factor 3: Comparative environmental, social, energy, and economic (ESEE) consequences solely on the basis of cost, at the point in the analysis when cost to provide public infrastructure and urban services is considered. The City's reasoning is based on a high level planning estimates of cost per linear mile⁸⁵, factors easily multiplied by the numbers of miles indicated in Table 5 needed to reach *potentially* suitable parcels of adequate size and slope, to calculate cost estimates for the comparative purposes of this analysis. For example, the City estimated extension of wastewater main to serve the Seavey Loop areas outlined in the Map "Springfield 2030 Plan: Potential UGB Expansion Engineering

⁸⁵ For example, Springfield City Council Agenda Item Summary, April 28, 2014, ATT2 provided the Council with approximate unit costs of wastewater and transportation improvements to supplement the City Engineer's memorandum. "These analyses were not budget-level cost estimations but rather estimates whose principal value is to permit comparison of relative levels of cost."

Feasibility Analysis, April 2014”⁸⁶ to cost 13 million dollars based on a unit cost of \$428/liner foot to extend the pressure main and a unit cost of 3.5 million to upgrade an MWMC pump station. These costs are for the offsite portion of the infrastructure extension to reach the outside boundary of the area shown in the referenced map and do not include the cost to the development site from that boundary.

Goal 14 Location Factor 3 and 4 Evaluation of *Potentially Suitable* Exception Land

The City relied on the same findings in Table 2 Second Priority Exception and Non-Resource Parcels and Constraints Analysis and Table 5 Public Facilities and Service Analysis — as explained and supported in greater detail in referenced facility plans, maps and supplemental evidence in the record — as the basis for comparing relative costs associated with constructing public facilities and providing public services to lands in the vicinity of the Springfield UGB, and thus to compare *economic* consequences (ESEE) of alternative expansion areas under Goal 14 Location Factor 3 in the next step in the UGB Alternatives Analysis. At this point in the analysis, the City excluded lands based on cost of needed infrastructure relative to the amount of suitable exception land to be served.

The City relied on the same findings in Table 2 Second Priority Exception and Non-Resource Parcels and Constraints Analysis and Table 5 Public Facilities and Service Analysis and associated text in this report — as explained and supported in greater detail in referenced facility plans, maps and supplemental evidence in the record — to compare the relative social, environmental and energy (ESEE) consequences associated with constructing public facilities, providing public services and urbanizing land to support industrial and commercial mixed-use development in alternative locations, and thus to compare the ESEE consequences of alternative expansion areas under Goal 14 Location Factor 3 in later steps in the UGB Alternatives Analysis.

Only one exception area was found to be *potentially* suitable and serviceable — **Far East A**, thus no further comparison with other second priority land under Goal 14 Location Factor 3 or Factor 4 was required.

Goal 14 Factor 3: Comparative environmental, social, energy, and economic (ESEE) consequences

The City evaluated the **Far East A** exception land parcel(s) further under a Goal 14 Location Factor 3 analysis: the comparative environmental, social, energy, and economic (ESEE) consequences.

Economic Consequences

The City’s Economic Opportunities Analysis Final report explains the importance of and the City of Springfield’s need to maintaining an inventory of suitable sites for industrial and commercial development to support a strong diverse economy and to provide for the city’s employment needs as required under Goal 9. To provide an adequate amount and suitable type of land for target industrial

⁸⁶ Ibid.

and commercial mixed use employers, the City needs to add suitable sites 5 acres and larger that are sloped less than 7% maximum for office uses and 5% or less for manufacturing uses. Economically feasible serviceability is an important factor in the City’s determination of whether it is reasonable to assume that a particular site is suitable for industrial or commercial use to meet the city’s identified site needs for employment land suitability as defined in OAR 660-009-0005(9).

The City reasoned that the following facts regarding **Far East A** exception land parcel(s) are relevant when considering the **economic** consequences of urbanization to establish a land supply for industrial and office commercial employment land uses in this location:

- The suitable acreage in Parcel 1 (6.4 acres) and Parcel 2 (6.9 acres) is marginal to meet Springfield’s identified land needs. CIBL/EOA Table 5-2 states that the average size of needed sites in the 5-20 acre category is 10 acres for an industrial site and 9.3 acres for a commercial and mixed use site.⁸⁷ Thus these two sites are too small to be suitable for industrial uses and are both smaller than the 9.3-acre average size of needed sites in the 5-20 acre category.
- 1701312001500; 6.9 acre slopes <15%, developed residential use, *entire property is sloped >12%
- The topography of the **Far East A** Parcel 2 site is limited to meet Springfield’s identified industrial and commercial site needs. Springfield’s target manufacturing industries require sites sloped 5% or less. Springfield’s target commercial and mixed use employers require sites sloped 7% or less. The City determined through GIS analysis⁸⁸, the portions of parcels 1 and 2 that is sloped 7% or less and 5% or less. Both parcels are developed with rural homes and structures.

Parcel #	Contiguous acres 7% or less slope	Contiguous acres 5% or less slope	Notes
Parcel 1: 1702362401500	7.2 ac.	5.9 ac.	developed residential use occupies highway side of parcel
Parcel 2: 1701312001500	5.5 ac. ⁸⁹	2.8 ac	Robinson parcel, recently removed from Metro Plan

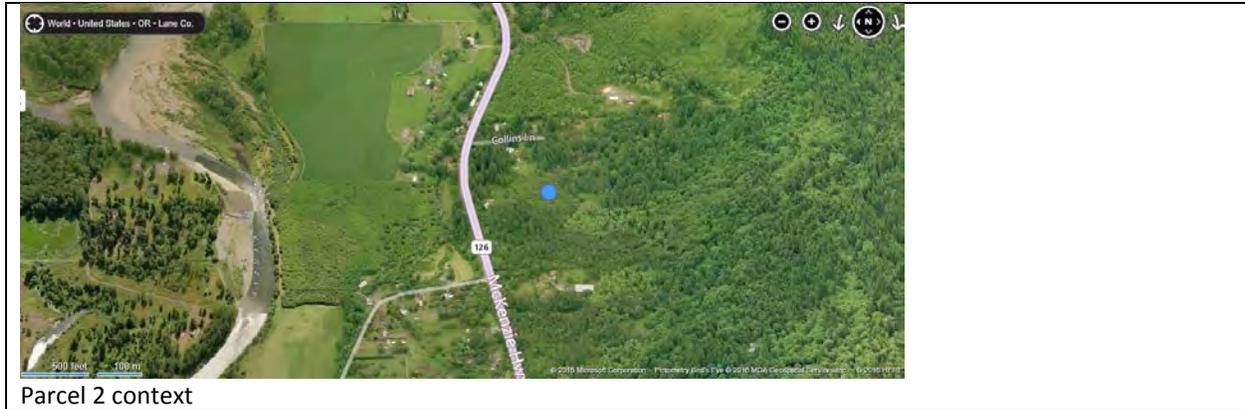


Parcel 2 context

⁸⁷ CIBL/EOA, p. 78.

⁸⁸ based on 2m resolution elevation data obtained from LCOG, email from staff Engelmann to staff Pauly, March 10,2016

⁸⁹ According to RLID, the mapped NRCS soil series for this parcel is “43E Dixonville-Philomath-Hazelair complex, 12 to 35% slopes, 100%”. The City’s GIS slopes analysis shows 6.9 acre sloped <15%



- As shown in Table 2, the area has only 2 parcels 5 acres or larger, a total of 13.3 acres and suitable acreage includes sloped land in excess of 5 and 7%.
- Suitable acreage in Parcel 1 and Parcel 2 is insufficient to justify the offsite cost to extend water and wastewater to Parcel 2.
- The suitable parcels are not contiguous to one another, thus cost share between property owners is unlikely.
- Offsite cost comes at relatively higher public cost than onsite connections to water, wastewater, stormwater and transportation systems.
- It is not reasonable to assume that the amount of potentially suitable land within Far East A would justify the cost to extend public infrastructure to the site.

Far East A parcels were considered physically serviceable. The relative distance to existing water, wastewater and transportation facilities suggests that water and wastewater facilities could be extended or upgraded to have adequate capacity within the 20-year planning period. However, there are only two sites 5 acres or larger (and the site abutting the UGB is sloped 12% or more), thus it would not be practical or feasible to extend infrastructure to serve one or two 5 acre sites.

The **Far East A** exception land parcel(s) cannot reasonably accommodate the needed urban industrial and commercial employment land uses based on **economic** consequences, because urbanization will not be economically feasible.

Environmental and Energy Consequences

The City finds that the following facts about **Far East A** exception land parcel(s) are relevant when considering the **environmental and energy** consequences of urbanization in this location:

- As shown in TSP Figure 12, no existing or planned pedestrian facilities serve east Main Street/Highway 126 east of 70th Street. No existing or planned pedestrian facilities serve Thurston Road east of 69th Street.
- As shown in TSP Figure 10 Main Street/Highway 126 and Thurston Road to the UGB extent are within the Recommended Roadway Network.
- As shown in TSP Figure 3, Main Street/Highway 126 is a Federal Truck Route.

- As shown in TSP Figure 9, planned frequent transit service network routes, the nearest connect is at Main Street/Highway 126 and Straub Parkway.

Geologic Hazards

The City referenced data in [Oregon HazVu](#), DOGAMI's online interactive geohazard map to identify hazard area areas. State of Oregon Department of Geology and Mineral Industries <http://oregongeology.org/pubs/>

Given that several of the UGB Preliminary Study Area groupings examined by the City are within, surrounded by or are accessible only by lands with steeply sloped topography, the City referenced data in the Oregon Department of Geology and Mineral Industries (DOGAMI) online interactive geohazard map to identify areas where landslide hazards have been documented. The DOGAMI website states that “the map offers a general look at regions that may be at risk for landslides, and will be used to help prioritize areas for future in-depth landslide mapping and study;” and “The Statewide Landslide Information Database of Oregon (SLIDO) project was created to improve our understanding of the landslide hazard in Oregon and to provide a statewide base level of landslide data. The original studies vary widely in scale, scope, and focus, which is reflected in a wide range in the accuracy, detail, and completeness with which landslides are mapped.” The map indicates areas of low, moderate, high and very high landslide susceptibility for counties, incorporated cities, and some watersheds. The DOGAMI website states: “Landslide susceptibility is the likelihood that a location will have landslides in the future.” DOGAMI maps are for informational purposes and are not regulatory.

The DOGAMI website states:

“One of the most common and devastating geologic hazards in Oregon is landslides. Average annual repair costs for landslides in Oregon exceed \$10 million, and severe winter storm losses can exceed \$100 million (Wang, Y., Summers, R. D., and Hofmeister, R. J., 2002, Landslide loss estimation pilot project in Oregon: Oregon Department of Geology and Mineral Industries Open-File Report O-02-05, 23 p.). As population growth continues to expand and development into landslide susceptible terrain occurs, greater losses are likely to result. In order to begin reducing losses from landslides, widespread endeavors are necessary at all community levels from state government to individual family homes. One successful way to reduce losses from landslides is through pre-disaster mitigation, which can be performed at many scales from statewide to local. To begin pre-disaster mitigation, the landslide hazard must be located. Once the hazard is located, the population and infrastructure vulnerable to the hazard can be identified and the risk mitigated.” (emphasis added)

The DOGAMI website states:

“The primary purpose of SLIDO is to provide the best currently available mapping of landslide features throughout Oregon. The database should serve as useful tool for differentiating broad areas of higher and lower hazards and as a starting point for more

detailed study. This spatial information is basic to emergency management and land-use applications, including:

- Identify vulnerable areas that may require planning considerations
- *Estimate potential losses from specific hazard events (before or after a disaster hits)*
- *Decide how to allocate resources for most effective and efficient response and recovery*
- *Prioritize mitigation measures that need to be implemented to reduce future losses”*
(emphasis added)

The City considered the DOGAMI SLIDO data for the purposes of informing the next steps in the analysis: 1) determination of suitability of land for urban growth including but not limited to physical factors involved when developing sites 5 acres and larger to accommodate specific types of industrial and commercial employment land uses to meet Springfield’s employment land needs; and 2) examination and comparison of the ESEE consequences of urbanizing lands within the second priority category.

The City appropriately considered the general DOGAMI SLIDO data in relationship to the UGB Preliminary Study Area to discern and differentiate broad areas of higher and lower landslide hazards to identify potentially vulnerable areas within the Preliminary Study Area that may require land use planning considerations.

The City appropriately used the general DOGAMI SLIDO data when it identified the UGB Preliminary Study Area groupings in the vicinity of documented landslide hazards to determine where there exists an increased likelihood that a location will have landslides in the future and where relatively greater losses are likely to result. Comparatively, the City considered areas without known landslide hazards to be more suitable for urbanization than areas with documented landslide hazards.

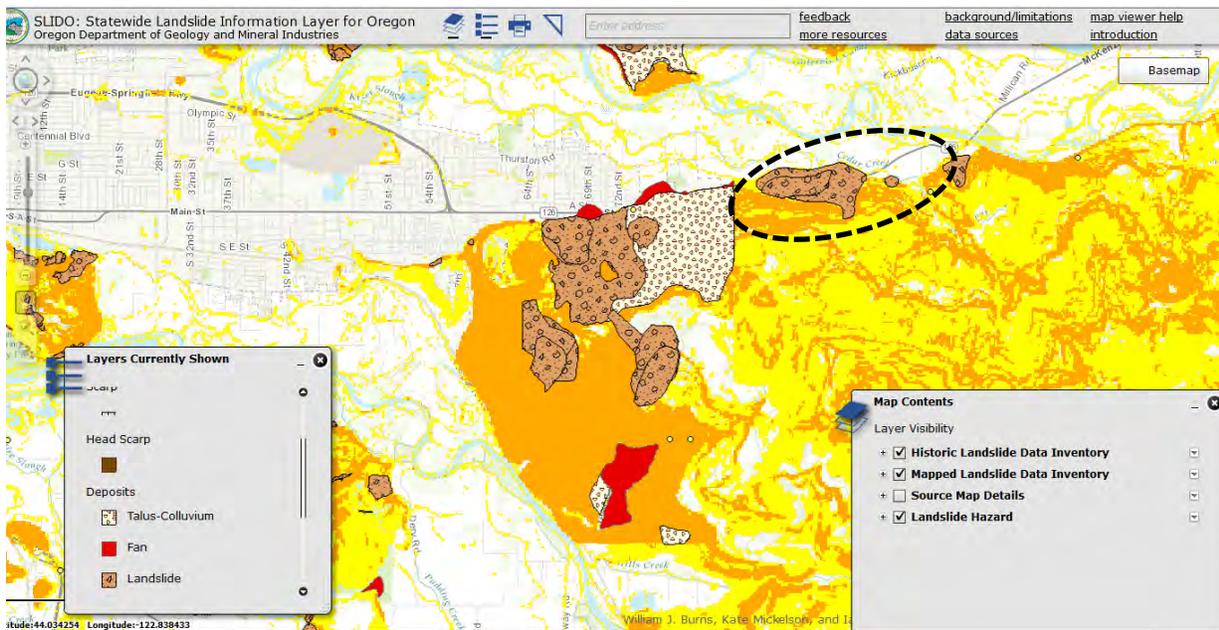
Oregon Statewide Planning Goal 7 directs local governments to “adopt comprehensive plans (inventories, policies and implementing measures) to reduce risk to people and property from natural hazards” including landslides. Springfield has acknowledged comprehensive plan policies and implementing measures to reduce risk to people and property from landslide hazards, including Springfield Development Code Section 3.3-500 Hillside Development Overlay District standards. These policies and standards were developed to address development of lands already inside the UGB that are planned to accommodate urban levels of development. New hazard information published by the State, such as the DOGAMI SLIDO data is useful to local governments as they plan expansions of their UGBs to accommodate forecast urban growth.

The City’s review of The DOGAMI SLIDO map data identified the presence of documented landslide hazards and relatively higher landslide susceptibility including Very High, High, and Moderate in the vicinity of UGB Preliminary Study Area groupings: McKenzie View A, B, Mohawk A, B and C, Oxbow/Camp Creek, **Far East**, South Hills, Wallace Creek and Seavey Loop B and C and Seavey Loop/Goshen. There exists an increased likelihood that mapped hazard locations will have landslides in the future compared to areas without mapped hazards.

DOGAMI SLIDO maps⁹⁰ of the South Hills area indicate the presence of landslide hazards in the in the immediate vicinity of the **Far East Springfield** Preliminary Study Area grouping.



Star indicates 5-acre residential parcels



Detail: DOGAMI SLIDO Far East landslide hazard area

The presence of landslide hazards influence future urbanization patterns by potentially increasing risk to public health, safety and welfare both onsite and offsite of the parcels of land being developed and/or by imposing constraints that could preclude development or contribute to the infeasibility of developing a particular site to accommodate the types of particular industrial and other employment uses identified in the CIBL/EOA. Although the City did not identify the presence of landslide hazards as an absolute development constraint for the purposes of the Commercial and Industrial Lands Inventory, the City considered areas with known landslide hazards as comparatively less “suitable” to meet the need for large site industrial and commercial mixed use employment site needs when it determined suitability of land for urban growth including but not limited to physically developing sites 5 acres and larger to accommodate specific types of industrial and commercial employment land uses to meet Springfield’s employment land needs; and when it examined and compared the ESEE consequences of urbanizing lands with or without known landslide hazards within the second priority category.

⁹⁰ Ibid.

The intensification of development associated with urbanization would require site grading and excavation to construct large site urban employment uses and to extend the infrastructure needed to serve development. Such grading and excavation may not be physically or economically feasible or advisable in areas of known instability, and such site development may not be achievable under the standards of the City's Development Code Hillside Development District.⁹¹

For purposes of the ESEE social and economic comparison, the City finds that when urbanization and development occurs in hillside areas with terrain known to be landslide-susceptible, greater losses are likely to result than when urbanization and development occurs in areas with terrain not known to be landslide-susceptible.

According to DOGAMI⁹² staff, when grading and excavation remove land from the basal area of a slide or when drainage is altered in a way that directs water to a slide, those actions serve to destabilize the slide. The DOGAMI map clearly indicates that McKenzie Highway 126 traverses the basal area of a slide area.

For purposes of the ESEE economic consequences comparison, the City finds that urbanization and development occurring in hillside areas with terrain known to be landslide-susceptible will be more costly to build and maintain than urbanization and development outside of areas with terrain not known to be landslide-susceptible, because such development must meet more rigorous engineering, architectural and construction requirements. The public cost of constructing infrastructure, providing services and maintaining infrastructure in sloped terrain is comparatively higher than developing public facilities on flatter areas.

For purposes of the ESEE environmental and social consequences comparison, the City finds that urbanization and development occurring in hillside areas with terrain known to be landslide-susceptible will result in higher risk to public health and safety than developing public facilities on with terrain not known to be landslide-susceptible.

The City finds that the **Far East A** exception land parcel(s) cannot reasonably accommodate the needed urban industrial and commercial employment land uses based on comparative **environmental** and **energy** consequences.

Social Consequences

⁹¹ Springfield Development Code Section 3.3-500 Hillside Development Overlay District is applied in residential zoning districts above 670 feet elevation or to development areas below 670 feet in elevation where any portion of the development area exceeds 15 percent slope. Development standards address special street grade and grading plan standards, and geotechnical report requirements to address geological conditions of the site.

⁹² Radio interview with DOGAMI Chief Scientist Ian Madin, on Jefferson Exchange program, 1280AM, March 10, 2016 explaining the SLIDO map data project.

The City finds that the following facts about **Far East A** exception land parcel(s) are relevant when considering the **social** consequences of urbanization in this location:

OAR 660-009-0005 (3) states:

“Industrial Use” means employment activities generating income from the production, handling or distribution of goods. Industrial uses include, but are not limited to: manufacturing; assembly; fabrication; processing; storage; logistics; warehousing; importation; distribution and transshipment; and research and development. Industrial uses may have unique land, infrastructure, energy, and transportation requirements. Industrial uses may have external impacts on surrounding uses and may cluster in traditional or new industrial areas where they are segregated from other non-industrial activities.”

The **Far East A** exception land parcel(s) cannot reasonably accommodate the needed urban industrial employment land uses because of the following **social** consequences:

- The Goal 9 rule’s definition of “industrial” clearly recognizes that “Industrial uses may have external impacts on surrounding uses;” and that industrial uses typically and traditionally may locate in locations where other industrial activities are occurring.
- Industrial uses may have external impacts on surrounding uses and may cluster in traditional or new industrial areas where they are segregated from other non-industrial activities.[OAR 660-009-0005(3)]
- The **Far East A** exception area is already committed to rural residential uses on small parcels.
- Based on the UGB Alternatives Analysis, input from the CIBL Technical Advisory Committee and the public, the **Far East A** area is better suited to residential uses than industrial or office commercial employment uses.
- The cost of extending offsite infrastructure to serve industrial and commercial mixed use development sites will create a public cost, as the city has limited legal authority to exact off-site improvements. Exactions must be proportional to the impacts of the development.

ORS 197.298(1)(b) Goal 14 Location Factor 3 Conclusion – Second Priority Lands Analysis

The City excluded Far East A lands based upon analysis of comparative ESEE consequences (Goal 14, Boundary Location, Factor 3). The City determined that the cost to serve 2 parcels 5 acres or larger — a total of 13.3 acres — is not economically feasible. These parcels are not contiguous to one another. McKenzie View A Preliminary Study Area grouping cannot reasonably be served with adequate public facilities by 2030 and thus are not suitable to meet the identified employment land need. The City finds that the long-term environmental, economic, social and energy consequences resulting from the use at the exception site with measures designed to reduce adverse impacts are significantly more adverse than would typically result from the same proposal being located in other areas.

Goal 14 Factor 4: Compatibility of proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB

The City finds that the following facts about **Far East A** exception land parcel(s) are relevant when considering the consequences of urbanization in this location:

- Excellent Class I and II agricultural soils exist on and immediately abutting and between the potentially suitable exception parcels. The land along the McKenzie River is prime class I and II farm land.

ORS 197.298 (1)(b) Goal 14 Location Factor 4 Conclusion – Second Priority Lands Analysis: Goal 14 Location Factor 4 implicitly requires that the City’s determination to exclude the exception area sites it considered and rejected must also be justified based on consideration of Goal 14 Location Factor 4: Compatibility with nearby ag and forest land. The City’s findings provide evidence to explain why this is the case.

As previously stated, the lands adjacent to the UGB that are identified in the Lane Rural Comprehensive Plan as exception or nonresource land are identified by orange color in Map 1 Priority Areas and Constraints Analysis. As shown in that map, Springfield is unlike many Oregon cities in that there are few exceptions areas in the immediate vicinity of the UGB. Most exception parcels closest to the City are small developed rural residential parcels on land divisions approved by Lane County prior to adoption of SB100 and thus not suitable for meeting Springfield’s large site employment land urbanization needs. Many of the exceptions parcels are remote and physically isolated from the City due to natural barriers formed by the McKenzie and Middle Fork Willamette rivers, steep topography of the Coburg Hills and Thurston South Hills, and other natural constraints. As shown in Map 1, and as explained in the following section of this report, most of the exceptions parcels areas in the vicinity of the UGB are located on the opposite side of the McKenzie and Middle Fork Willamette rivers, and many are constrained by slopes >15%.

The City’s description of exception land Table 2 provides evidence to demonstrate that expanding the UGB onto exception lands in all instances would actually promote urban sprawl by “opening up” new corridors of urbanization into, through, and adjacent to extensive large blocks of resource land areas north of the McKenzie River, up the McKenzie River, and south of the Springfield UGB. In all but two instances (Far East Springfield which has one exception parcel 5 acres or larger abutting the UGB, and Clearwater, which has no parcel 5 acres or larger), exception areas are located remote to the UGB and would require leapfrogging across land unsuitable for urbanization to extend infrastructure and services to remote parcels of land.

The analysis of efficient accommodation of identified land needs under Goal 14, factor 1, allows a local government to consider the ability of a site to accommodate a compact urban form. The term “maximum efficiency of land uses” invokes a concern for avoiding leapfrog or sprawling development inconsistent with the density and connectivity associated with urban development. In addition to being highly inefficient, impractical and financially infeasible, it would have consequences that could pose impacts to nearby ag and forest land and uses thereon, including but not limited to increased traffic conflicts with farm or forestry vehicles.

Also it should be noted that some exception parcels, while developed, committed and zoned for rural uses, comprise Class 1 and 2 agricultural soils that, if included in the UGB, would become urbanizable. Throughout the analysis, staff noted the presence of agricultural uses in many of these areas that currently provide opportunities for small “micro” farms close to the urban area that contribute to the local food system economy.⁹³

ORS 197.298 (1)(b) Conclusions – Second Priority Lands Analysis

ORS 197.298 requires that urbanization be directed to the second priority exception or non-resource lands to accommodate the land need if the second priority lands can “reasonably accommodate” the identified land need. As explained in this report, and supported by the substantive and evidence in the record, the City conducted a complete and thorough alternatives analysis of second priority lands adjacent to the UGB that was not limited to those lots or parcels that abut the UGB, but also included all exception land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency. [OAR 660-024-0060(4)].

The City determined that second priority lands adjacent to or in the vicinity of the UGB cannot reasonably accommodate the identified employment land need. The City’s decision was reached after identifying and evaluating all exception and non-resource land in the vicinity of the UGB, after identifying and evaluating potentially suitable exception parcels 5 acres or larger (including contiguous parcels <5 acres under same ownership) without absolute development constraints; after consultation with experts to identify needed site characteristics for the target industrial and commercial/mixed use industries identified in the CIBL/EOA that require sites 5 acres and larger and 20 acres and larger, including public facilities needs for industrial and commercial land development; after consultation with public facility and services providers including ODOT; after evaluation of exception land location and topography as it relates to the ability to extend public facilities of sufficient physical capacity and structure to support provision of urban services including water and wastewater mains and public transit service to UGB expansion areas; in consideration of applicable policies in the *Springfield Development Code* Chapter 5.7-100 for annexing territory; after consideration of infrastructure and transportation needs to serve lands already in the UGB as identified in the applicable *Eugene-Springfield*

⁹³ **Citation:** Local Food system report in the record

Metropolitan Area Public Facilities and Services Plan, applicable transportation system plans, facilities master plans and capital improvement programs; and after consideration of the City's development standards and requirements for urban development in the *Springfield Development Code* Chapters 3.2-300, 3.2-400, 3.2-600, 3.3-300, 3.3-300, 3.3-400, 3.3-500, 3.3-1000, Chapter 4 in its entirety and the *Springfield Engineering Design Standards and Procedures Manual*.

After a thorough parcel-by-parcel evaluation, the City determined that urbanization cannot be directed to the exception and non-resource lands adjacent to the UGB because exception and non-resource lands cannot "reasonably accommodate" the identified specific industrial and commercial-mixed use land need for sites 5 acres and larger. Therefore, second priority exception and non-resource lands are inadequate to accommodate the amount of land needed because specific types of identified land needs cannot be reasonably accommodated on exception and non-resource lands, and future urban services could not reasonably be provided to the exception and non-resource lands due to topographical or other physical constraints.

The City's conclusion that exception and non-resource lands adjacent to the UGB these lands could not reasonably be provided with urban services within the 2010-2030 planning period based on topographical or other physical constraints was reached based on sound reasoning of ample data and is supported by substantial evidence in the record.

After conducting a thorough parcel-by-parcel evaluation of *potentially* suitable parcels that could reasonably accommodate the identified specific industrial and commercial-mixed use land need for sites 5 acres and larger and that are potentially serviceable due to proximity and lack of topographic or other physical constraints (**Far East A**), the City determined that the comparative environmental, economic, social and energy consequences of directing urbanization to the Far East A area compare unfavorably to directing urbanization to other lands because land is not suitable to meet the site needs of target industries and the amount of unconstrained land is economically infeasible to serve with public water and wastewater facilities on a cost basis. The City concluded that urbanization of Far East A is not economically viable on a service cost basis.

After conducting a thorough parcel-by-parcel evaluation of the location of the **Far East A** in relationship to land designated for agriculture and forestry in the Lane Rural Comprehensive Plan; and after consideration of comparative environmental, energy, economic and social consequences of urbanizing those lands for the purpose of developing industrial and office commercial urban uses [Goal 14 Boundary Location Factor 3]; and after consideration of compatibility of the proposed industrial and office commercial urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB [Goal 14 Boundary Location Factor 4] the City concluded that urbanization of Far East A and other exception land is not economically viable on a service cost basis and is more likely to negatively affect nearby agricultural and forest activities occurring on farm and forest land outside the UGB by extending or expanding new corridors of urban development into areas primarily designated for agricultural and forest use. [Goal 14 Boundary Location Factor 4] conclusions here.

Thus, urbanization of exception land compares unfavorably with other lands the City considered for inclusion in the UGB.

The City's evaluation properly considered second priority exception and non-resource lands as alternative boundary locations consistent with ORS 197.298 and Goal 14 Boundary Location Factors 3 and 4.

The City's conclusion that directing urbanization to the Far East A exception area would not "reasonably accommodate" the identified specific industrial and commercial-mixed use land need for sites 5 acres and larger was reached based on sound reasoning of ample data and is supported by substantial evidence in the record.

The City's conclusion that directing urbanization to the Far East A exception area to accommodate the identified specific industrial and commercial-mixed use land need for sites 5 acres and larger compares unfavorably to directing urbanization to other lands was reached based on sound reasoning of ample data and is supported by substantial evidence in the record.

Therefore, second priority exception and non-resource area lands are inadequate to accommodate the amount of land needed.

The City's conclusion that second priority exception and non-resource lands are inadequate to accommodate the amount of employment land needed because specific types of identified land needs was reached based on sound reasoning of ample data and is supported by substantial evidence in the record.

The preceding analysis provide substantive evidence to explain why the city concluded that most of the 72 isolated, remote and scattered second priority exception land parcels 5 acres or larger are not serviceable and suitable to meet Springfield's employment land needs and why the few, scattered parcels that may be serviceable are of insufficient size, quantity and location to be provided with economically feasible and cost efficient infrastructure and services.

To accommodate the identified land need, the City identified and evaluated the next priority of land under ORS 197.298.

ORS 197.298 (1)(c):

"If land under paragraphs (a) and (b) of this subsection is inadequate to accommodate the amount of land needed, third priority is land designated as marginal land pursuant to ORS 197.247 (1991 Edition)."

OAR 660-024-0060(1)

"(c) If the amount of suitable land in the first priority category is not adequate to satisfy the identified need deficiency, a local government must determine which land in the next priority is suitable to accommodate the remaining need, and proceed using the same

method specified in subsections (a) and (b) of this section until the land need is accommodated.”

IDENTIFY THIRD PRIORITY MARGINAL LAND

Next, the City’s analysis identified third priority marginal lands adjacent to the UGB. As shown in Table 7, marginal lands exist in three areas adjacent to Springfield’s UGB: Oxbow/Camp Creek, Mohawk and Wallace Creek.

Table 7 Preliminary Study Areas Containing Third Priority Marginal Lands:

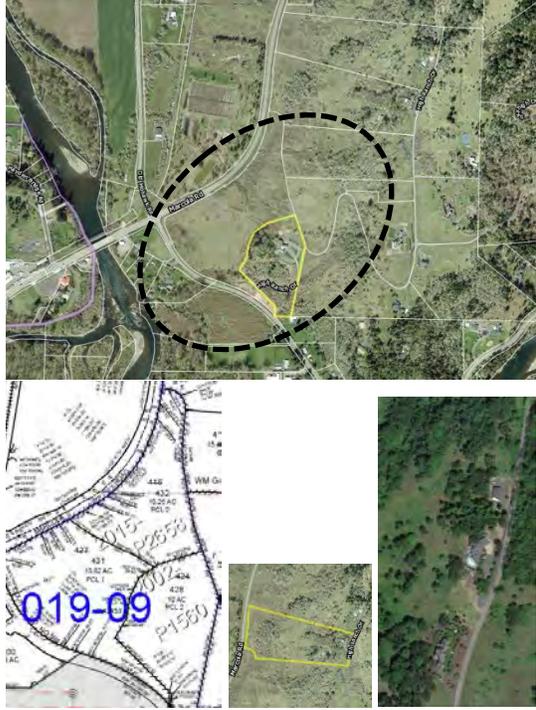
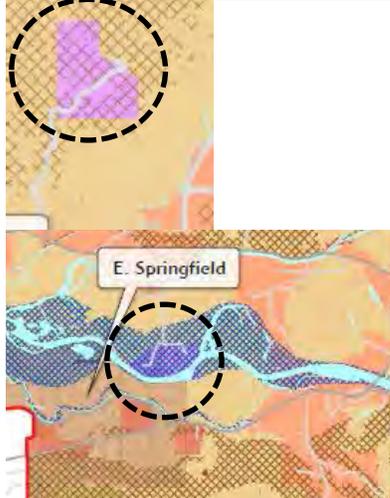
North Gateway	McKenzie View	Oxbow/Camp Creek
Hayden Bridge	Mohawk	North Springfield Highway
East Springfield	South Hills	West Jasper/Mahogany
Wallace Creek	Jasper Bridge	Mill Race
Seavey Loop	Thurston	Clearwater

This section of the report provides explanation and evidence to support the City’s findings addressing ORS 197.298(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060(1)(c), OAR 660-024-0060(1)(d), OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR 660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c).

Table 8: General Description of Third Priority Marginal Lands Parcels and Constraints provides a general descriptive summary of the Third Priority marginal lands in the vicinity of the UGB. Where shown, the red line in the small maps below is the UGB. Underlined parcel numbers indicate parcels with 5 or more unconstrained acres.

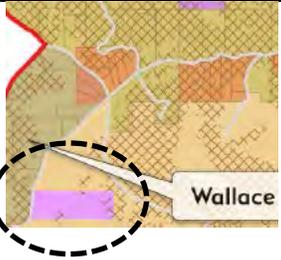
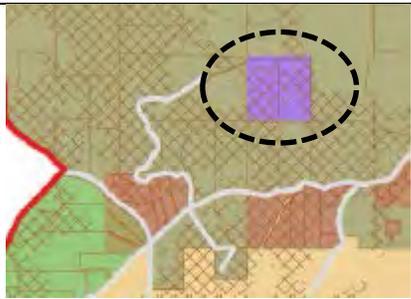
Table 8: Third Priority Marginal Lands Parcels and Constraints	
<p>Mohawk Marginal⁹⁴</p> <ul style="list-style-type: none"> • Skyline Ranch plat, 20-acre rural residential lots • Slopes > 25%, slopes 15-25% cover most of area • Some parcels with flatter topography are located in the SW portion of this area: <ul style="list-style-type: none"> ○ <u>17-02-20-00 428: 5.8 acres</u> <15% slopes, developed w/New Song Church, hydric soils 	

⁹⁴ See maps in record “Employment Opportunity Area 2 Hayden Bridge Area – Potential Study Area Evaluation”, ECONorthwest, November 2008 showing marginal land area parcel sizes and slope constraints; and copy of A & T map 17-02-20-00 with marginal parcels highlighted and slope calculations for parcels.

 <ul style="list-style-type: none"> ○ <u>17-02-20-00 0431: 8 acres <5% slope. 13.8 acres, 80 % of 13.8 ac. site is NRCS CI 8 (110—Pits)⁹⁵, 12% of site has 3-12% slopes, 8% has slopes<3%, vacant. Parcel 1 of Subdivision 2015-P2658.</u> ○ <u>17-02-20-00 0432: 9.3 acres slopes < 15% (3 acres <5%, 6.3 5-15%), hydric soils, vacant</u> ○ <u>17-02-20-00 0413: developed rural residential use on High Ranch Drive, small flatter topo area (<5 acres) along Marcola road edge of parcel</u> ○ <u>17-02-20-00 0412: 20.6 acres developed rural residential use on High Ranch Drive, small flatter topo area (~2 acres) along Marcola road edge of parcel, 56% of parcel has slopes > 12%, slopes up to 75%, hydric soils</u> <ul style="list-style-type: none"> • Other parcels in this area have slopes > 15% and are developed with rural residential uses. • (3) parcels 5.8-9.3 unconstrained acres in this area 	
<p>Oxbow/Camp Creek Marginal⁹⁶</p> <ul style="list-style-type: none"> • Three contiguous 15-acre parcels: 17022400 TL 406 (73% 12-45% slopes), TL 407 (94% 12-45% slopes), TL 408 (84% 12-45% slopes) • Slopes 12-45% • Remote from UGB • Developed with rural residential uses.  <ul style="list-style-type: none"> • Marginal parcels on the McKenzie River 17-01-30-00 2300, 2301, 2302, 2303 are entirely in the floodway 	

⁹⁵ Soil and slope percentages determined from NRCS data in the Lane County Regional Land Information Database. NRCS Soil Survey of Lane County, p. 123 defines soil map unit 110—Pits “as open excavations from which soil and commonly some of the underlying material have been removed.” ...Some pits “are being filled or will be filled with industrial waste or material from roadside cutbank slopes or ditch cleaning.”

⁹⁶ See maps in record A & T map 17-02-21-24 with marginal land parcels highlighted. Slope percentages determined from NRCS data in the Lane County Regional Land Information Database

<p>Wallace Creek Marginal A</p> <ul style="list-style-type: none"> ○ Within 1 mile of UGB via Jasper Rd. and Wallace Creek Rd. ○ (2)20-acre parcels (separate ownership) Some slopes 2-12%, some >15% ○ <u>18-02-14-00 1002 17.9 unconstrained acres</u> ○ <u>18-02-14-00 1003 17.7 unconstrained acres</u> (Wallace Creek⁹⁷ 50' setback assumed) ○ Wetlands and hydric soils are present along Wallace Creek, both sides of Wallace Creek Rd. 	
<p>Wallace Creek Marginal B</p> <ul style="list-style-type: none"> ● Predominantly slopes >15% ● 2 parcels, total of 40.3 acres, separate ownership, homes on each parcel ● 18-02-12-00 TL 302 3.8 acres unconstrained ● <u>18-02-12-00 TL 303 6.4 acres unconstrained</u> (unconstrained portion is developed with rural residence) 	

IDENTIFY THIRD PRIORITY MARGINAL LAND WITH THE SPECIFIED CHARACTERISTICS TO MEET THE IDENTIFIED EMPLOYMENT LAND NEED TO INCLUDE IN THE UGB

⁹⁷ *Water Quality Results for the Middle and Coast Fork Willamette Watersheds and Eight Small Cities in the Upper Willamette Sub-basin: 2008- 2010, July 2011, http://www.longtom.org/wp-content/uploads/2012/05/Upper-Willamette-WQ-Monitoring-Final-Report_2010.pdf* report states: “Wallace Creek, a small tributary that enters the Middle Fork Willamette River downstream of Dexter Dam and which dries up in the summer, always met the State Standard for temperature but did not for dissolved oxygen and E. coli.”

Suitability Findings: Marginal Land

To identify potentially suitable marginal land sites to meet employment land needs, the City applied the following factors⁹⁸ (from an outline provided by DLCD Staff Gordon Howard) to exclude or include marginal lands in the next stage of the evaluation process:

- Exclude lands that are not buildable⁹⁹
- Exclude lands based upon specific land needs (197.298(3)(a))

The next step in the City's process identified which marginal land parcels could potentially be suitable to meet the City's need for employment land, including sites larger than 20 acres. This step excluded parcels or portions of parcels with absolute development constraints that make lands not buildable, and excluded marginal land with pre-existing development and parcelization patterns that limit the suitability of lands for use as future employment sites.

For the purpose of evaluating third priority marginal land, the City identified the following criteria to apply equally to all parcels within the Preliminary Study Area — in order of the land's priority under ORS 197.298— to determine whether a parcel of land or group of parcels is potentially suitable to meet employment land needs.

Site size is a key factor because Springfield's land need in the UGB expansion is for sites larger than 5 acres, with some needed sites larger than 20 acres.

The City identified parcels 5 acres or larger as potentially suitable to meet employment land needs, and excluded parcels or portions of parcels <5 acres from further analysis.

Topography is a key factor in determining suitability because Springfield's land need is for industrial and commercial employment sites with relatively flat topography <5% and <7%.

Consistent with the absolute constraints applied in the Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis (CIBL/EOA), the City identified the following factors as "absolute constraints" to development of employment uses and to providing urban services to employment land:

- Portions of tax lots with slopes>15%
- Portions of tax lots comprising waterways and inventoried wetlands
- Portions of tax lots within the floodway
- Portions of tax lots within riparian resource areas

The City excluded portions of parcels constrained by floodway, inventoried wetlands, waterways, and riparian resources when it analyzed the suitable acreage of a parcel or group of parcels. As these factors preclude or place limitations on whether a parcel is buildable for urban development, they subsequently

⁹⁹ "Buildable" is a Goal 10 term. It is the City's position that OAR 660-024-0060 (1) requires the City to consider whether sites are "suitable" at this "buildable" stage in the evaluation process.

preclude or place limitations on the suitability of land to accommodate the need deficiency determined under OAR 660-024-0050.

The City identified parcels or portions of parcels with slopes <15% as potentially suitable to meet employment land needs, and excluded parcels or portions of parcels with slopes >15% from further analysis.

The City excluded portions of parcels constrained by floodway, inventoried wetlands, waterways, and riparian resources when it analyzed the suitable acreage of a parcel or group of parcels.

The City’s findings describe or map all of the alternative areas evaluated in the boundary location alternatives analysis as required by OAR 660-024-0060(6). The City’s analysis involves more than one parcel or area within a particular priority category in ORS 197.298 for which circumstances are the same, so as permitted under OAR 660-024-0060(6), the City is allowed to consider and evaluate these parcels or areas as a single group. The City analyzed parcels within a priority category by geographic groupings as permitted under OAR 660-024-0060(6).

In addition to the summary data compiled in Table 8, the record includes maps, acreage calculations and other evidence demonstrating that the City uniformly evaluated parcelization, slopes, floodway, inventoried wetlands, waterways, and riparian resources on all marginal land parcels in the preliminary study area when it identified potentially suitable ORS 197.298 third priority marginal land parcels.

In addition to the summary data compiled in Table 8, the record includes maps, acreage calculations and other evidence demonstrating that the City uniformly evaluated parcelization, slopes, floodway, inventoried wetlands, waterways, and riparian resources on all marginal land parcels in the preliminary study area as the factual basis to justify excluding ORS 197.298 third priority marginal land parcels from further analysis.

None of the marginal land areas contains a potentially redevelopable parcel larger than 20 acres without absolute development constraints.

As shown in Table X, two marginal land groupings contain vacant or potentially redevelopable parcels 5-20 acres without absolute development constraints:

Table 9: Potentially Suitable Third Priority Marginal Land		
Area	Vacant or potentially redevelopable parcels larger than 20 acres without absolute development constraints?	Vacant or potentially redevelopable 5-20 acre parcels without absolute development constraints?
Mohawk	No	Yes
Oxbow/Camp Creek	No	No
Wallace Creek A	No	Yes
Wallace Creek B	No	Yes

As described and shown in the preceding text and graphics, and as verified by supporting evidence (parcel maps data and GIS maps) in the record, the City applied characteristics of parcel size, topography, and absolute development constraints (floodway, wetlands, riparian resources) to all third

priority marginal land parcels in the Preliminary UGB Study Area to identify potentially suitable third priority land to meet the employment land need. **These steps excluded the Oxbow/Camp Creek and Wallace Creek B marginal land parcels from further analysis.**

To identify potentially suitable marginal land sites to meet employment land needs, the City applied the following factors¹⁰⁰ (from an outline provided by DLCD Staff Gordon Howard) to exclude or include marginal lands in the next stage of the evaluation process:

- Exclude lands that are not buildable¹⁰¹
- Exclude lands based upon specific land needs (197.298(3)(a))

Two marginal land areas — Mohawk and Wallace Creek A (indicated by a “yes” in Table 9) could potentially provide sites 5-20 acres in size without absolute development constraints to meet employment land needs.

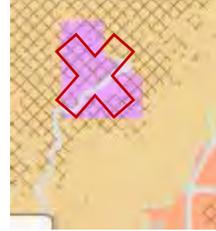
The City identified Mohawk and Wallace Creek A marginal land parcels as worthy of additional analysis to determine serviceability and suitability to meet the need for smaller 5-20 acre sites.

No marginal land area will provide a vacant or potentially redevelopable candidate site 20 acres and larger without absolute development constraints to meet employment land needs.

The City’s need for sites 20 acres and larger cannot be met by adding marginal land lands to the UGB.

The Oxbow/Camp Creek and Wallace Creek B marginal land parcels were excluded from further analysis.

Table 10: Third Priority Marginal land parcels excluded:

Oxbow/Camp Creek	Wallace Creek B	Mohawk
		

In the next step, the City conducted a public facilities and services analysis to determine whether the *potentially* suitable land identified in the previous step could reasonably be provided with the public water, sewer, stormwater and transportation facilities needed to serve industrial and commercial mixed

¹⁰¹ “Buildable” is a Goal 10 term. It is the City’s position that OAR 660-024-0060 (1) requires the City to consider whether sites are “suitable” at this “buildable” stage in the evaluation process.

use employment uses within the 2010-2030 planning period and thus be considered suitable candidate lands to accommodate the identified employment land need deficiency determined under OAR 660-024-0050.

As previously explained in this report for land to be “suitable” for industrial and other employment use under OAR 660-009-0005(12) it must be “serviceable.” OAR 660-009-0005(9) states that “‘Serviceable’ means a city or county has determined that public facilities and transportation facilities, as defined by OAR chapter 660, division 11 and division 12, currently have adequate capacity for development planned in the service area where the site is located or can be upgraded to have adequate capacity within the 20-year planning period.”

Public Services Analysis of Potentially Suitable Third Priority Land

OAR 660-024-0060(7) states:

“For purposes of Goal 14 Boundary Location Factor 2, “public facilities and services” means water, sanitary sewer, storm water management, and transportation facilities.”

Using GIS mapping and analysis tools and input received from the CIBL Technical Advisory Committee, City, County and State public agency staff including ODOT and Lane Transit District, other service providers and the public, the City conducted analysis to evaluate, compare and determine whether and how water, sanitary sewer, storm water management, and transportation facilities could be provided to potentially suitable third priority marginal land parcels within the Mohawk, Oxbow/Camp Creek, and Wallace Creek areas. The result of this step is a determination of whether parcels within each priority and within each geographic grouping can reasonably be served to support the employment land uses identified in the CIBL/EOA within the 2010-2030 planning horizon.

As previously explained in this report Goal 11 requires public facilities to be planned to support types and levels of urban facilities and services appropriate for Springfield’s needs and requirements, consistent with the comprehensive plan. Springfield’s need is for the types and levels of public facilities and services appropriate and necessary to support the needs of urban industrial and commercial uses generally and manufacturing and office employment sites specifically.¹⁰² Goal 11 requires public facilities and services to be provided “*in a timely, orderly and efficient arrangement.*” Goal 14 requires cities to evaluate changes to their UGB considering “*orderly and economic provision of public facilities and services.*”

As previously explained in this report requirements under OAR chapter 660, division must be considered at this stage in the UGB Alternatives Analysis to ensure that the amendment of the comprehensive plan to add urbanizable lands to the UGB is supported by adequate planned transportation facilities in a manner that is consistent with applicable transportation planning requirements in OAR chapter 660,

¹⁰² Springfield’s Target Industries are listed and explained in detail in the CIBL/EOA.

division 12. The City is expanding the UGB to designate suitable land for industrial and commercial development, therefore suitable candidate lands added to the UGB must provide for the relevant transportation needs: movement of goods and services to support industrial and commercial development planned for pursuant to OAR chapter 660, division 9 and Goal 9 (Economic Development);[OAR 660-012-0030 (1)(c)] and movement of workforce employees to and from the workplace, including needs of the transportation disadvantaged.

Just as the TSP must “evaluate potential impacts of system alternatives that can reasonably be expected to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology;”[OAR 660-012-0035] the City’s UGB study carefully examined and compared alternative candidate growth areas to determine which alternative(s) can reasonably be expected to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology.”

The transportation system must “support urban development by providing types and levels of transportation facilities and services appropriate to serve the land uses identified in the acknowledged comprehensive plan.” [OAR 660-012-0035(3)(a)]. The City is expanding the UGB to designate suitable land for industrial and commercial development, therefore suitable candidate lands added to the UGB must be located where the relevant transportation needs can be provided: movement of goods and services to support the industrial and commercial employment development planned for pursuant to OAR chapter 660, division 9 and Goal 9 (Economic Development), and movement of workforce employees to and from the workplace, including needs of the transportation disadvantaged. [OAR 660-012-0030(1)(b)]

The City evaluated alternative candidate lands to consider the advantages and disadvantages of moving goods and service, workforce employees, including needs of the transportation disadvantaged via the existing and planned transportation system to minimize adverse economic, social, environmental and energy consequences. [OAR 660-012-0035(3)(c)]. The City accomplished this by measuring and comparing distance to candidate sites via existing and planned routes.

To address OAR 660-012-0005 (41) “*Vehicle Miles of Travel (VMT)*”, the City considered the VMT advantages and disadvantages of moving goods and service, workforce employees, including needs of the transportation disadvantaged via the existing and planned transportation system [OAR 660-012-0005(41)]when it evaluated alternative candidate lands. The City accomplished this by measuring and comparing distance to candidate sites via existing and planned routes, assuming build out of the planned system. This is germane to the evaluation of serviceability because urban transit service is required for a city of Springfield’s size, to ensure that new jobs can be accessible to that transportation disadvantaged and as an important means to reducing VMT. Thus, ability to reasonably provide public transit service to new urban areas is a critical and necessary component of serviceability in this case. The City, in consultation with Lane Transit District staff, considered whether extending public transit service to candidate expansion areas can reasonably be expected to be feasible to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology.

The City correctly applied the requirement of OAR 660-024-0060(7) in its analysis of third priority land under ORS 197.298 by evaluating and comparing water, sanitary sewer, storm water management, and transportation facilities in its analysis of "public facilities and services", as demonstrated in the summary of data in Table 11 and as further supported by evidence in the record.

The Public Services Analysis section, on pages 211-251 of this report provides a general overview and maps of existing water, sanitary sewer, storm water management, and transportation facilities the City referenced when it described the physical location and proximity of existing facilities to *potentially* suitable parcels, when it identified physical or regulatory barriers that would make service extensions difficult or physically infeasible to support development within the 2010-2030 planning period, and when it evaluated impacts to facilities needed to serve lands already in the UGB. As previously noted, that section of the report provides explanation and evidence to support the City's findings addressing ORS 197.298(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060(1)(c), OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR 660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c) — including additional evidence to support the City's rationale for excluding from consideration the **Oxbow/Camp Creek, Wallace Creek B and Mohawk** marginal land parcels in the City's previous step.

Table 11 summarizes and compares the opportunities and constraints associated with constructing public facilities and providing public services to lands in the vicinity of the Springfield UGB. The information summarized in Table X is based on information received from City engineering and transportation staff, the Springfield CIBL Technical Advisory Committee (TAC), service providers, public agency staff that were consulted with throughout the multi-year urbanization study process, and the public facilities plans identified in the previous sections of this report. In the Public Facilities and Services Analysis, the City identified physical constraints, engineering constraints, including legal constraints that affect or influence the physical placement of wastewater or stormwater management facilities.

The analysis includes a high planning level assessment of the relative degree of difficulty of providing public facilities and services. Early in the iterative multi-year analysis process, engineering and transportation staff, public service agency staff were asked to assign a numeric value ranging from 1-5 to assess and compare the relative degree of difficulty of providing public facilities and services to an area with 1=EASIER, 3=MEDIUM DIFFICULT, 5=DIFFICULT.¹⁰³ The relative rankings assigned were based on conceptual-level discussion of the wastewater, transportation, and stormwater improvements that would likely be needed to provide these public services to serve general areas, not individual parcels. Relative degree of difficulty addressed providing services to the edge of an area and did not include providing services internally within an area. These discussions and assessments were not based upon detailed analysis and are therefore subject to change. Cost of service was not estimated or evaluated at this point in the analysis.

¹⁰³ Draft Buildable Lands Inventory, 12/11/09 by City Engineer Ken Vogeney, input from Springfield Utility Board

In addition to the summary data compiled in Table 11, the record includes studies, facilities master plans, maps, documentation from engineering staff and service providers, demonstrating that the City uniformly evaluated and compared ability to provide urban services to all potentially suitable marginal land parcels when it identified potentially suitable ORS 197.298 third priority marginal land parcels.

In addition to the summary data compiled in Table 11, the record includes studies, facilities master plans, maps, documentation from engineering staff and service providers, demonstrating that the City uniformly evaluated and compared ability to provide urban services to all potentially suitable marginal land parcels as the factual basis to justify excluding ORS 197.298 third priority marginal land parcels from further analysis.

The City’s conclusions regarding which lands to exclude are reasonable and supported by ample evidence.

Although third priority areas **Mohawk Marginal, Oxbow/Camp Creek Marginal and Wallace Creek B Marginal** were excluded from further consideration under OAR 660-009-0005(12) in the city’s previous step because these lands lacked the appropriate site characteristics, these areas could also be dismissed under the public services analysis because providing water, sewer, stormwater and transportation facilities and service would be physically infeasible in the planning period 2010-2030.

Table 11 - Public Services Analysis of Potentially Suitable Marginal Land	
Mohawk Marginal Parcels	
Water	<p>5 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Separated from urban services by the McKenzie River, must cross river with urban services • River is a barrier to extension of water transmission that makes extension of public water system infeasible¹⁰⁴ • Nearest water transmission line is a 16” line at Marcola Rd. /Hayden Bridge
Wastewater	<p>5 Difficult</p> <ul style="list-style-type: none"> • Separated from urban services by the McKenzie River, must cross river with urban services • Separated from urban services by the McKenzie River, must cross river with urban services • Will require pumping across the river and expanding capacity in existing sewer in Marcola Road (existing UGB). Geology precludes boring under river in this location. • Would require new trunk line from North Springfield Interceptor to and along Hayden Bridge Rd and new pump stations inside area to get flow to new trunk. Bridge is high point. Pump stations are needed to bring flow up to bridge and across river, then gravity flow to interceptor. <p>Nearest collection system is a 10” line in Marcola Rd., 4 miles to outer areas</p>

¹⁰⁴ See email from City Civil Engineer Clayton McEachern P.E., to Linda Pauly, dated 2/8/16 describing physical constraints to extending a water transmission line across the McKenzie River either via the existing bridge or by boring underwater.

<p>Stormwater</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • Separated from urban services by the McKenzie River • No new outfalls permitted upstream from Hayden Bridge (Three Basin Rule¹⁰⁵) • Eugene Water and Electric Board’s water intake at Hayden Bridge would require significant separation from any new outfalls developed downstream from the intake¹⁰⁶ • No developed system in vicinity
<p>Transportation (including transit service)</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Access to Springfield is across the McKenzie River via 42nd Street and Marcola Rd. (Rural Major Collector, 46-36’ wide), Old Mohawk Rd. (Rural Minor Collector/Rural Local Collector, 30’ wide), and Camp Creek Rd. (Rural Major Collector, 30’ wide).^{107 108} Roads may need improvement to accommodate additional development and provide multi-modal access: <ul style="list-style-type: none"> • Upgrade 42nd St. to urban standards¹⁰⁹ • Upgrade 42nd/Marcola intersection • May need to upgrade 42nd and OR 126 interchange¹¹⁰ • Upgrade Camp Creek to urban standards and provide capacity improvements • Would require internal collector street system. • Existing bridge in place, but would need to be improved to provide full urban standards including multi-modal access. • Urban standards and capacity improvements needed on existing and future collector system from Mohawk/Highway 126 interchange to area, including Hayden Bridge Rd, 19th St, 23rd St, and 31st St • Previous ODOT study showed a need for upgrading at Hwy 126 and 42nd St. (without UGB expansion). Traffic backs up at the 42nd St. rail crossing at entrance to the IP plant, causing delays with access to Hwy 126. • Located 1-5 miles mile from Highway 126/I-105, and I-5 • Steep slopes east of Marcola Rd. • Access would route traffic through farmland and rural residential areas • Marcola Road and Old Mohawk Road: “With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length.”¹¹¹ • No transit services, pedestrian facilities or ADA access in area. Nearest service is

¹⁰⁵ OAR 340-041-0350(1)(b) prohibits new or increased waste discharges that require NPDES permit, WPCF permit, or 401 Certification to the waters of the McKenzie River Subbasin above the Hayden Bridge (river mile 15).

¹⁰⁶ See email from City Civil Engineer Clayton McEachern P.E., describing physical factors that preclude construction of new stormwater outfalls in the vicinity of EWEB’s Hayden Bridge McKenzie River water intake facility.

¹⁰⁷ Source of Functional Classifications: 2004 Lane County Transportation System Plan Functional Class Subarea 14 Map 4-14

¹⁰⁸ Source of road widths: Lane County Roads Inventory,

http://www.lanecounty.org/Departments/PW/TransPlanning/Documents/AppendixB_RoadsInventory.pdf

Accessed January 26, 2016

¹⁰⁹ Project # R-41 42nd St. from Marcola Rd. to railroad tracks is listed as a “20-year priority project” in the Springfield 2035 TSP Attachment A.

¹¹⁰ See ODOT staff Helton email to staff Reesor, Dec. 29, 2008: “The interchange on Hwy 126 at 42nd St. has failing segments even with planned improvements, but it can probably be made to operate with additional improvements to the local system.” Project #R-35 is identified as a “Beyond 20-year Project” in the 2035 Springfield TSP, Appendix A, p. 14.

¹¹¹ Lane County Weight Restricted Bridges and Approved Route List (Revised 02-2014), <http://www.odot.state.or.us/forms/motcarr/od/4020.pdf>, website accessed 2-5-16.

	<p>Route 17 Hayden Bridge Rd. and 19th Street. Route Description: "The route begins at Springfield Station (Bay B) and travels North on 5th Street where it serves Springfield City Hall and Library and the Fred Meyer Shopping Center. The bus travels East on Hayden Bridge Place, North on 7th Street, West on Hayden Bridge Road, and South onto 19th Street where it serves Mohawk Marketplace. The bus travels West on Q Street and South on 5th Street to return to Springfield Station."¹¹²</p>
<p>Urban services conclusion: Mohawk Marginal</p>	<p>The City excluded the Mohawk Third Priority lands from consideration because these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield's identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).</p>
<p>Wallace Creek A Marginal Parcels</p>	
<p>Water</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • Parcels are separated from urban services by distance and topography • The nearest water transmission line is the 24" "Natron" water line, extended in 2013 to the SW corner of the school district property. The 16" line from Westwind/Linda Lane provides a looped system. • A planned 24" line will extend south from Weyerhaeuser Haul Rd. to serve the SE portion of the UGB. • Wallace Creek Rd. corridor alignment and topography are not conducive to infrastructure extensions. Extension of infrastructure along the Weyerhaeuser Haul Road alignment may be possible. • No developed system in vicinity • Marginal land parcels are located ~2.5 miles from the nearest water main. • Separated by at-grade rail crossing at Jasper Rd/Wallace Creek Rd.
<p>Wastewater</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • Separated from urban services by distance and topography • Parcels are located more than 1.5 miles from the UGB and more than 2 miles to the nearest trunk sewer (Jasper Trunk). • Wallace Creek Rd. corridor alignment and topography are not conducive to infrastructure extensions. Extension of infrastructure along the Weyerhaeuser Haul Road alignment may be possible. • It is anticipated one or two additional small pump stations may be needed to serve some portions of the area depending upon future development configuration and topography. • Capacity in Jasper Trunk Sewer is not expected to be a concern because flow timing and rates can be managed via the pump station.

¹¹² Email from LTD staff Will Mueller, dated June 28, 2013 provides comments describing the physical requirements necessary to provide transit service applicable to extending transit service to any new areas: "Connecting roadways and streets would need to be constructed to city standards that support LTD's buses including sufficient lane width, intersection curb radii, and sidewalk width at prospective bus stops to meet ADA standards in effect at time of construction (2013 standards require 8' sidewalks at bus stops).

	<ul style="list-style-type: none"> • Separated by at-grade rail crossing at Jasper Rd/Wallace Creek Rd. • No developed system in vicinity.
<p>Stormwater</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • Separated from urban services by distance and topography • No developed system in vicinity • Presence of wetland, Wallace Creek and intermittent streams on the two parcels may provide opportunity for stormwater conveyance and management if water quality standards can be met. • Physical connections to the Middle Fork Willamette River system can be made with little or no impact on existing stormwater systems. • Upgrade existing Wallace Creek stormwater outfall to Middle Fork Willamette River • New stormwater outfalls will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands. • The Middle Fork Willamette River is federally classified as critical salmonid habitat. • Stormwater management through the use of on-site retention and/or infiltration may be possible in flatter topo areas of parcels.
<p>Transportation (including transit service)</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Would require secondary access • Existing rail crossing at Jasper Rd/Wallace Creek Rd. is substandard. Upgrade would be needed. An at-grade crossing may not be feasible in this location. Existing traffic waiting to cross backs into Jasper Rd. 24 trains/day. • Wallace Creek Road will need improvement to urban standards. The existing narrow, winding alignment through sloped topography is a constraint. • DOGAMI SLIDO mapped landslide hazard area along Wallace Creek Road • Access via Jasper Rd., but urban standards and capacity improvements needed¹¹³: Improvement of the entire length of Jasper Road to urban standards and upgrade to 4 lanes to Main Street via South 42nd Street, including Union Pacific mainline crossing upgrades on South 42nd Street and intersection upgrades along the length of the entire corridor. • Topography limits expansion of Jasper Rd. portion of the narrow corridor next to the Willamette River • May trigger capacity improvements (4-lane section) for Bob Straub Parkway: Improvements to Bob Straub Parkway from Jasper Road to Daisy Street, upgrading to 4 lanes. • Intersection improvements will be needed at Bob Straub Parkway and Daisy Street.¹¹⁴ • Jasper Rd. & Straub Parkway: “With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length.” • Intersection improvements will be needed at Bob Straub Parkway and Jasper Road, which will include a new traffic signal. • A new road connection from Bob Straub Parkway to Jasper Road will be needed in the vicinity of Tax Lot 1802090000103, which will include a new grade separated crossing over the railroad.

¹¹³ See Jasper Bridge exception area

¹¹⁴ Project #R-44 is identified as a “Beyond 20-year Project” in the 2035 Springfield TSP

	<ul style="list-style-type: none"> • Connection to Hwy 58 but limited connection to Hwy 126/I-5 • “Need to further study capacity at the I-5/Hwy 58th interchange. Improvements may be needed depending on size and location of expansion area.”¹¹⁵ • Nearest transit service is at Thurston Station on Main Street, >3 miles away.¹¹⁶ No transit services, pedestrian facilities or ADA access in area. • “Main St/Straub Parkway intersection is failing today even with planned interchange improvements”, and there are safety issues with signal. Traffic would need to be distributed differently. Significant development would need to participate in funding of ODOT IAMP. Impacts to the OR126/Main St intersection should be considered. ODOT’s previous analysis indicate that the OR 126/Main St, Main St/54th St. and Main St/58th St all exceed capacity by 2031.”^{117, 118}
<p>Urban services conclusion: Wallace Creek Marginal A</p>	<p>The City excluded the Wallace Creek Marginal A parcels from consideration because the area does not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses in this location. Providing service to the area will present significant challenges not only in the length of improvements, but also the multiple at grade railroad crossings that will likely be needed along Jasper Road and Wallace Creek Rd. In addition, Jasper Road will likely need to be upgraded to provide capacity for employment development. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extensions and upgrades of water, wastewater and transportation, services including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).</p>
<p>Wallace Creek B Marginal Parcels</p>	
<p>Water</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • Parcels are separated from urban services by distance and topography • The nearest water transmission line is the 24” “Natron” water line, extended in 2013 to the SW corner of the school district property. The 16” line from Westwind/Linda Lane provides a looped system. • A planned 24” line will extend south from Weyerhaeuser Haul Rd. to serve the SE portion of the UGB. • Wallace Creek Rd. corridor alignment and topography are not conducive to infrastructure extensions. Extension along Weyerhaeuser Haul Road alignment may be possible. • No developed system in vicinity

¹¹⁵ Comments received from ODOT Region 2, Area 5 staff Savannah Crawford, email dated June 18, 2013.

¹¹⁶ Email from LTD staff Will Mueller, dated June 28, 2013 provides comments describing the physical requirements necessary to provide transit service applicable to extending transit service to any new areas: “Connecting roadways and streets would need to be constructed to city standards that support LTD’s buses including sufficient lane width, intersection curb radii, and sidewalk width at prospective bus stops to meet ADA standards in effect at time of construction (2013 standards require 8’ sidewalks at bus stops).

¹¹⁷ Comments received from ODOT staff Crawford, meeting on June 11, 2013 and email dated June 18, 2013.

¹¹⁸ Interchange improvements at Main St/Hwy 126 and Highway 126 at 52nd are listed as financially constrained projects in the Regional Transportation Plan (RTP).

	<ul style="list-style-type: none"> • Marginal land parcels are located more than 3 miles from the nearest water main.
Wastewater	<p>5 Difficult</p> <ul style="list-style-type: none"> • Separated from urban services by distance and topography • No developed system in vicinity. • Parcels are located more than 1.5 miles from the UGB and more than 2 miles to the nearest trunk sewer (Jasper Trunk). • Wallace Creek Rd. corridor alignment and topography are not conducive to infrastructure extensions. Extension of infrastructure along the Weyerhaeuser Haul Road alignment may be possible. • It is anticipated one or two additional small pump stations may be needed to serve some portions of the area depending upon future development configuration and topography. • Capacity in Jasper Trunk Sewer is not expected to be a concern because flow timing and rates can be managed via the pump station.
Stormwater	<p>5 Difficult</p> <ul style="list-style-type: none"> • Separated from urban services by distance and topography • No developed system in vicinity • Physical connections to the Middle Fork Willamette River system can be made with little or no impact on existing stormwater systems. • Development of the area may require land acquisition to safely convey stormwater runoff to the River. • Upgrade existing Wallace Creek outfall to Middle Fork Willamette River New stormwater outfalls will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands. The Middle Fork Willamette River is federally classified as critical salmonid habitat. • Stormwater management through the use of on-site retention and/or infiltration would be challenging given the sloped topography.
Transportation (including transit service)	<ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Would require secondary access • Marginal B parcels are remote, accessed via Jasper Rd.- Wallace Creek Rd. – to vicinity of R.R. Baker Rd. Topo separates from upper Wallace Creek Rd. • Existing rail crossing at Jasper Rd/Wallace Creek Rd. is substandard. Upgrade would be needed. An at-grade crossing may not be feasible in this location. Existing traffic waiting to cross backs into Jasper Rd. 24 trains/day. • Wallace Creek Road will need improvement to urban standards. The existing narrow, winding alignment through sloped topography is a constraint. • DOGAMI SLIDO mapped landslide hazard area along Wallace Creek Road • Access via Jasper Rd., but urban standards and capacity improvements needed¹¹⁹: Improvement of the entire length of Jasper Road to urban standards and upgrade to 4 lanes to Main Street via South 42nd Street, including Union Pacific mainline crossing upgrades on South 42nd Street and intersection upgrades along the length of the entire corridor. • Topography limits expansion of Jasper Rd. portion of the narrow corridor next to the Willamette River • May trigger capacity improvements (4-lane section) for Bob Straub Parkway: Improvements to Bob Straub Parkway from Jasper Road to Daisy Street, upgrading

¹¹⁹ See Jasper Bridge exception area

	<p>to 4 lanes.</p> <ul style="list-style-type: none"> • Intersection improvements will be needed at Bob Straub Parkway and Daisy Street.¹²⁰ • Jasper Rd. & Straub Parkway: “With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length.” • Intersection improvements will be needed at Bob Straub Parkway and Jasper Road, which will include a new traffic signal. • A new road connection from Bob Straub Parkway to Jasper Road will be needed in the vicinity of Tax Lot 1802090000103, which will include a new grade separated crossing over the railroad. • Connection to Hwy 58 but limited connection to Hwy 126/I-5 • “Need to further study capacity at the I-5/Hwy 58th interchange. Improvements may be needed depending on size and location of expansion area.”¹²¹ • Nearest transit service is at Thurston Station on Main Street, >3 miles away.¹²² No transit services, pedestrian facilities or ADA access in area. • “Main St/Straub Parkway intersection is failing today even with planned interchange improvements”, and there are safety issues with signal. Traffic would need to be distributed differently. Significant development would need to participate in funding of ODOT IAMP. Impacts to the OR126/Main St intersection should be considered. ODOT’s previous analysis indicate that the OR 126/Main St, Main St/54th St. and Main St/58th St all exceed capacity by 2031.”^{123, 124} 
<p>Urban services conclusion: Wallace Creek Marginal B</p>	<p>The City excluded the Wallace Creek Marginal B parcels from consideration because the area does not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses in this location. Providing service to the area will present significant challenges not only in the length of improvements, but also the multiple at grade railroad crossings that will likely be needed along Jasper Road and Wallace Creek Rd. In addition, Jasper Road will likely need to be upgraded to provide capacity for employment development. Lands cannot reasonably be provided with urban services due to physical constraints of</p>

¹²⁰ Project #R-44 is identified as a “Beyond 20-year Project” in the 2035 Springfield TSP

¹²¹ Comments received from ODOT Region 2, Area 5 staff Savannah Crawford, email dated June 18, 2013.

¹²² Email from LTD staff Will Mueller, dated June 28, 2013 provides comments describing the physical requirements necessary to provide transit service applicable to extending transit service to any new areas: “Connecting roadways and streets would need to be constructed to city standards that support LTD’s buses including sufficient lane width, intersection curb radii, and sidewalk width at prospective bus stops to meet ADA standards in effect at time of construction (2013 standards require 8’ sidewalks at bus stops).

¹²³ Comments received from ODOT staff Crawford, meeting on June 11, 2013 and email dated June 18, 2013.

¹²⁴ Interchange improvements at Main St/Hwy 126 and Highway 126 at 52nd are listed as financially constrained projects in the Regional Transportation Plan (RTP).

	distance and topography that preclude reasonable extensions and upgrades of water, wastewater and transportation, services including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).
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The City relied on the findings in Table 11 — as further documented by referenced facility plans, maps and supplemental evidence in the record — to determine whether *potentially suitable* candidate second priority lands can be served with public water, wastewater, stormwater, and transportation including public transit systems within the 2010-2030 planning period based on physical constraints. In this step, the City excluded lands it deemed not serviceable based on physical constraints — and therefore not suitable — from further consideration in the UGB Alternatives Analysis.

The City’s evaluation of alternatives and its conclusions regarding serviceability and thus suitability are based on a comparative analysis of physical facilities and services constraints that is appropriate for this level of planning. The City applied service comparison factors uniformly to the land under each priority.

As required in OAR 660-024-0060(8)(a), the City evaluated and compared the relative advantages and disadvantages of potentially suitable third priority marginal land by gathering and compiling data in Table 8: General Description of Third Priority Marginal Lands Parcels and Constraints and Table 11: Public Services Analysis of Potentially Suitable Marginal Land Summary. For the purpose of evaluating serviceability of parcels within the third priority [ORS 197.298(3)(b)], the City grouped the potentially suitable third priority parcels within general geographic areas. Based on this data, the City determined whether a parcel or group of marginal land parcels could reasonably be provided with the water, sewer/wastewater, stormwater, and transportation including transit facilities and services needed to urbanize land to accommodate the need deficiency determined under OAR 660-024-0050 within the 2010-2030 planning period.

The City correctly applied the requirement of OAR 660-024-0060(8)(a) in its analysis of third priority land under ORS 197.298.

As stated in OAR 660-024-0060(8)(b), the capacity of existing public facilities and services to serve areas already inside the UGB as well as areas proposed for addition to the UGB is a key factor to be considered in making a determination with respect to the provision of public facilities and services needed to urbanize alternative boundary locations, and thus capacity is a key factor to be considered in making a determination that a particular area is suitable to accommodate the need deficiency determined under OAR 660-024-0050.

As required in OAR 660-024-0060(8)(b), the City analyzed, evaluated and compared impacts to existing public facilities and services to serve areas already inside the UGB when it compiled data in Table 8: General Description of Third Priority Marginal Lands Parcels and Constraints and Table 11: Public Services Analysis of Potentially Suitable Marginal Land Summary. Based on this data, the City

determined whether and how providing a parcel or group of third priority marginal land parcels with the water, sewer/wastewater, stormwater, and transportation including transit services needed to urbanize land to accommodate the need deficiency determined under OAR 660-024-0050 would impact existing and planned public facilities and services within the 2010-2030 planning period.

The City correctly applied the requirement of OAR 660-024-0060(8)(b) in its analysis of third priority land under ORS 197.298.

As stated in OAR 660-024-0060(8)(c), the need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements on existing roadways — and as Springfield is an urban areas of 25,000 or more — the provision of public transit service, are key factors to be considered in making a determination with respect to the provision of public facilities and services needed to urbanize alternative boundary locations; and thus are key factors to be considered in making a determination that a particular area is suitable to accommodate the need deficiency determined under OAR 660-024-0050.

As required in OAR 660-024-0060(8)(c), the City evaluated and compared advantages and disadvantages with respect to the need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements on existing roadways and the provision of public transit service by gathering and compiling facilities maps and data in Table 8: General Description of Third Priority Marginal Lands Parcels and Constraints and Table 11: Public Services Analysis of Potentially Suitable Marginal Land Summary. The City collected public facilities data from ODOT and other Federal, State and Local agencies and service providers. Based on this data, the City determined whether a parcel or group of third priority marginal land parcels could be made accessible with the transportation facilities including transit services needed to urbanize land to accommodate the need deficiency determined under OAR 660-024-0050 within the 2010-2030 planning period.

The City correctly applied the requirement of OAR 660-024-0060(8)(c) in its analysis of third priority land under ORS 197.298.

The City excluded the third priority lands based upon specific land needs (197.298(3)(a)):

- **This step excluded parcels with less than 5 unconstrained acres.**
- **The City excluded lands based on slopes exceeding 7%, distance to I-5**
- **This step excluded Oxbow/Camp Creek Marginal from further analysis.**
- **This step excluded Wallace Creek Marginal A from further analysis.**
- **This step confirmed exclusion of Wallace Creek Marginal B parcels.**
- **This step excluded Mohawk Marginal parcels.**

The City excluded the third priority lands based upon inability to reasonably provide urban services due to physical constraints (197.298(3)(b))

- **This step confirmed exclusion of Mohawk Marginal parcels.**

- This step confirmed exclusion of Wallace Creek Marginal A parcels.
- This step confirmed exclusion of Oxbow/Camp Creek Marginal parcels.

ORS 197.298 (1)(b) Goal 14 Location Factor 3 – Second Priority Lands Analysis

To confirm its evaluation of *potentially* suitable marginal land sites to satisfy the employment land need deficiency, the City applied Goal 14 Factor 3 to evaluate the Far East A area exception parcels based on comparative ESEE consequences (Goal 14, Boundary Location, Factor 3), and based on compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4).

As previously noted, DLCD staff Gordon Howard provided an outline of the steps to be followed to exclude or include land:

- Exclude lands that are not buildable¹²⁵
- Exclude lands based upon specific land needs (197.298(3)(a));
- Exclude lands based upon inability to reasonably provide urban services due to physical constraints (197.298(3)(b));
- Include lower priority lands needed to include or provide services to urban reserve lands (197.298(3)(c));
- **Exclude lands based upon analysis of comparative ESEE consequences (Goal 14, Boundary Location, Factor 3);**
- **Exclude lands based upon analysis of compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4)**

The City addressed Goal 14 Location Factor 3 as part of the ORS 197.298 evaluation process after making a determination of which third priority lands were potentially suitable based on parcel size size and lack of constraints, and after identifying potentially suitable parcels within a given geographic area grouping that could reasonably be serviceable by 2030. Goal 14 Location Factor 3 requires the City to make a determination that third priority parcels of land selected to be included in an urban growth boundary (UGB) will result in better environmental, social, energy, and economic (ESEE) consequences than the other lands of equal priority considered in this step and other alternative sites that were considered for inclusion and rejected. Under a Goal 14 Factor 3 analysis regarding public facilities and services, a local government may consider relative difficulty and cost differences between urbanizing alternative sites and may consider whether the amount of potentially suitable land within a geographic area could reasonably justify the extension of public infrastructure.

Mohawk Marginal, Wallace Creek Marginal A, and Oxbow/Camp Creek Marginal were excluded from further consideration for inclusion in the UGB based on physical constraints that preclude serviceability. It is important to note that although the City did not exclude these lands on the basis of comparative

¹²⁵ “Buildable” is a Goal 10 term. It is the City’s position that OAR 660-024-0060 (1) requires the City to consider whether sites are “suitable” at this “buildable” stage in the evaluation process.

environmental, social, energy, and economic (ESEE) consequences, all of these excluded lands would be excluded under Goal 14 Location Factor 3: Comparative environmental, social, energy, and economic (ESEE) consequences solely on the basis of cost, at the point in the analysis when cost to provide public infrastructure and urban services is considered. The City’s reasoning is based on a high level planning estimates of cost per linear mile¹²⁶, factors easily multiplied by the numbers of miles indicated in Table 11 needed to reach *potentially* suitable parcels of adequate size and slope, to calculate cost estimates for the comparative purposes of this analysis.

- **This step confirmed exclusion of Mohawk Marginal parcels**
- **This step confirmed exclusion of Wallace Creek Marginal A**
- **This step confirmed exclusion of Oxbow/Camp Creek Marginal.**

Table 12 Third Priority Marginal Land Excluded on the basis of specific land needs [ORS 197.298(3)(a)], Public Facilities [ORS 197.298(3)(b)], and ESEE Consequences
McKenzie View
Mohawk
Wallace Creek A
Wallace Creek B

As explained in this report, and supported by the substantive and evidence in the record, the City conducted a complete and thorough alternatives analysis of third priority lands adjacent to the UGB that was not limited to those lots or parcels that abut the UGB, but also included all land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency. [OAR 660-024-0060(4)].

The City determined that third priority lands adjacent to or in the vicinity of the UGB are not suitable to meet the identified employment land need and cannot reasonably accommodate the identified employment land need. The City’s decision was reached after identifying and evaluating marginal land in the vicinity of the UGB, after identifying and evaluating potentially suitable parcels 5 acres or larger without absolute development constraints; after consultation with experts to identify needed site characteristics for the target industrial and commercial/mixed use industries identified in the CIBL/EOA that require sites 5 acres and larger and 20 acres and larger, including public facilities needs for industrial and commercial land development; after consultation with public facility and services providers including ODOT; after evaluation of exception land location and topography as it relates to the ability to extend public facilities of sufficient physical capacity and structure to support provision of urban services including water and wastewater mains and public transit service to UGB expansion areas; in consideration of applicable policies in the *Springfield Development Code* Chapter 5.7-100 for annexing

¹²⁶ For example, Springfield City Council Agenda Item Summary, April 28, 2014, ATT2 provided the Council with approximate unit costs of wastewater and transportation improvements to supplement the City Engineer’s memorandum. “These analyses were not budget-level cost estimations but rather estimates whose principal value is to permit comparison of relative levels of cost.”

territory; after consideration of infrastructure and transportation needs to serve lands already in the UGB as identified in the applicable *Eugene-Springfield Metropolitan Area Public Facilities and Services Plan*, applicable transportation system plans, facilities master plans and capital improvement programs; and after consideration of the City's development standards and requirements for urban development in the *Springfield Development Code* Chapters 3.2-300, 3.2-400, 3.2-600, 3.3-300, 3.3-300, 3.3-400, 3.3-500, 3.3-1000, Chapter 4 in its entirety and the *Springfield Engineering Design Standards and Procedures Manual*.

ORS 197.298 (1)(c) Conclusion – Third Priority Lands Analysis: After a thorough parcel-by-parcel evaluation, the City determined that urbanization cannot be directed to the marginal lands adjacent to the UGB because marginal lands are not suitable and cannot reasonably accommodate the identified specific industrial and commercial-mixed use land need for sites 5 acres and larger. Therefore, third priority marginal lands are inadequate to accommodate the amount of land because specific types of identified land needs cannot be reasonably accommodated on the marginal lands, and future urban services could not reasonably be provided to the marginal lands due to topographical or other physical constraints.

ORS 197.298 Conclusion: The City properly applied and followed the prioritization requirements in ORS 197.298 to the UGB alternatives analysis when it studied, evaluated and selected land which land to be included within the urban growth boundary amendment.

CONSIDERATION OF LAND OF LOWER PRIORITY [ORS 197.298(1)(d)]

ORS 197.298 (1)(d):

“If land under paragraphs (a) to (c) of this subsection is inadequate to accommodate the amount of land needed, fourth priority is land designated in an acknowledged comprehensive plan for agriculture or forestry, or both.”

ORS 197.298(2):

“Higher priority shall be given to land of lower capability as measured by the capability classification system or by cubic foot site class, whichever is appropriate for the current use.”

OAR 660-024-0060(1)(d):

“Notwithstanding subsection (a) to (c) of this section, a local government may consider land of lower priority as specified in ORS 197.298(3).”

ORS 197.298(3)

“Land of lower priority under subsection (1) of this section may be included in an urban growth boundary if land of higher priority is found to be inadequate to accommodate the amount of land estimated in subsection (1) of this section for one or more of the following reasons:

(a) Specific types of identified land needs cannot be reasonably accommodated on higher priority lands;

(b) Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or

(c) Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.”

After the City examined and excluded all land of higher priority for expansion under ORS 197.298 (1)(b) and (1)(c), and found those lands unsuitable and thus inadequate to accommodate the land need, the City’s next two steps were to identify fourth priority land adjacent to and in the vicinity of the UGB that is potentially suitable to meet the need deficiency, [ORS 197.298 (1)(d)] and to evaluate potentially suitable land “by agriculture or forest land capability as measured by the capability classification system or by cubic foot site class, whichever is appropriate for the current use.” [ORS 197.298(2)] In this next step, the City identified candidate UGB study areas lands for further evaluation and comparison under ORS 197.298(3) by 1) identifying fourth priority lands; and 2) prioritizing those lands as required under ORS 197.298(2):

“Higher priority shall be given to land of lower capability as measured by the capability classification system or by cubic foot site class, whichever is appropriate for the current use.”

The statute directs the City to further prioritize lands land designated in an acknowledged comprehensive plan for agriculture or forestry for inclusion on the basis of the capability classification system or cubic foot class.

The statute directs the City to identify and evaluate both agriculture and forest lands in this step and without prioritize one over the other. Instead, the statute directs the analysis to consider “fourth priority land designated in an acknowledged comprehensive plan for agriculture or forestry, or both.”

IDENTIFY FOURTH PRIORITY LAND DESIGNATED IN AN ACKNOWLEDGED COMPREHENSIVE PLAN FOR AGRICULTURE OR FORESTRY OR BOTH

With the exception of its western boundary located along Interstate Highway 5, nearly all of Springfield’s UGB is surrounded by land designated in an acknowledged comprehensive plan for agriculture and forestry. As shown in Table 13, land designated in an acknowledged comprehensive plan for agriculture or forestry is present in every area adjacent to and in the vicinity of Springfield’s UGB.

North Gateway	McKenzie View	Oxbow/Camp Creek
Hayden Bridge	Mohawk	North Springfield Highway
Far East	South Hills	West Jasper/Mahogany
Wallace Creek	Jasper Bridge	Mill Race
Seavey Loop	Thurston	Clearwater

Table 13 indicates study area groupings that contain areas designated for agriculture in the Lane Rural Comprehensive Plan with beige color, consistent with the color used to indicate the Agriculture plan designation in the Lane Rural Comprehensive Plan maps used in this analysis.

Table 13 indicates study area groupings that contain areas designated for forestry in the Lane Rural Comprehensive Plan with olive green color, consistent with the color used to indicate the Agriculture plan designation in the Lane Rural Comprehensive Plan maps used in this analysis.

Table 13 indicates study area groupings that contain areas designated for agriculture and forestry in the Lane Rural Comprehensive Plan with both colors.

This section of the report provides explanation and evidence to support the City’s findings addressing ORS 197.298(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060

(1)(c), OAR 660-024-0060(1)(d), OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR 660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c), Goal 14, Boundary Location Factor 3; and Goal 14, Boundary Location, Factor 4.

To perform analysis of the much larger set of fourth priority lands adjacent or in the vicinity of the UGB, the City conducted analysis by geographic area groupings in its next step. Table 14 provides a general descriptive summary of the Fourth Priority lands adjacent to and in the vicinity of the UGB. Lands in the Preliminary Study area are organized geographically and are named consistently with the names used in the second and third priority lands analyses.

This step identified candidate fourth priority land that *could* potentially be added to the UGB if deemed suitable to accommodate the employment land need deficiency determined under OAR 660-024-0050. The City's description of each grouping in Table 14 includes maps and information to identify agriculture or forest plan designations, dominant soil capability classifications and general physical and locational characteristics.

The City's description of each exception area identified the presence of "absolute development constraints" (slopes >15%, floodway, wetlands, and riparian resource areas) in each area to provide data to inform its determination of which fourth priority land parcels or portions of parcels *may* potentially be suitable to accommodate the employment land need deficiency determined under OAR 660-024-0050.

For the purposes of the preliminary screening of fourth priority land in Table 14, the City applied the same constraints criteria as those applied in the City's Commercial and Industrial Buildable Lands (CIBL) inventory of land inside the UGB:

- Slopes – slopes over 15% are considered unbuildable
- Floodway – areas within the floodway as mapped by FEMA are considered unbuildable
- Wetlands – areas identified in the national wetlands inventory or Springfield's local wetlands inventory are considered unbuildable
- Riparian resource areas – areas identified by Springfield or Lane County as riparian resource areas are considered unbuildable.

OAR 660-009-0005(2)

"Development Constraints" means factors that temporarily or permanently limit or prevent the use of land for economic development. Development constraints include, but are not limited to, wetlands, environmentally sensitive areas such as habitat, environmental contamination, slope, topography, cultural and archeological resources,

infrastructure deficiencies, parcel fragmentation, or natural hazard areas.” [emphasis added]

OAR 660-009-0005(11)

“Site Characteristics” means the attributes of a site necessary for a particular industrial or other employment use to operate. Site characteristics include, but are not limited to, a minimum acreage or site configuration including shape and topography, visibility, specific types or levels of public facilities, services or energy infrastructure, or proximity to a particular transportation or freight facility such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes.”
[emphasis added]

The development constraints applied in the City’s analysis are constraints identified in OAR 660-009-0005(2) and site attributes identified in OAR 660-009-0005(11).

For the purposes of increasingly detailed analysis to determine suitability of potentially suitable fourth priority land in Table X to meet the site needs of the City’s target employers and in addition to excluding lands with slopes 15% or greater, the City applied the following needed site characteristic parameters applicable to the City’s target employment industries¹:

- Springfield’s target manufacturing industries require sites sloped 5% or less.
- Springfield’s target commercial and mixed use employers require sites sloped 7% or less.

The constraint of “infrastructure deficiencies that temporarily or permanently limit or prevent the use of land for economic development” is identified separately in the Public Facilities Analysis.

The City used industry standard GIS mapping and measuring tools and methods to quantify parcel and constraints data for evaluation as groupings were selected for further analysis in the UGB study.

Table 14 provides a general descriptive summary of the Fourth Priority lands in the vicinity of the UGB. Table 14 provides a context photo² and two side-by-side maps of each Preliminary Study area grouping: 1) an excerpt from the Lane County Map viewer plan map indicating LRCP plan designation;^{3 4} and 2) an excerpt from Map 4: LRCP plan designation, ECONorthwest, December 2008 indicating soil classification.

These map excerpts are color keyed as shown on the following page.

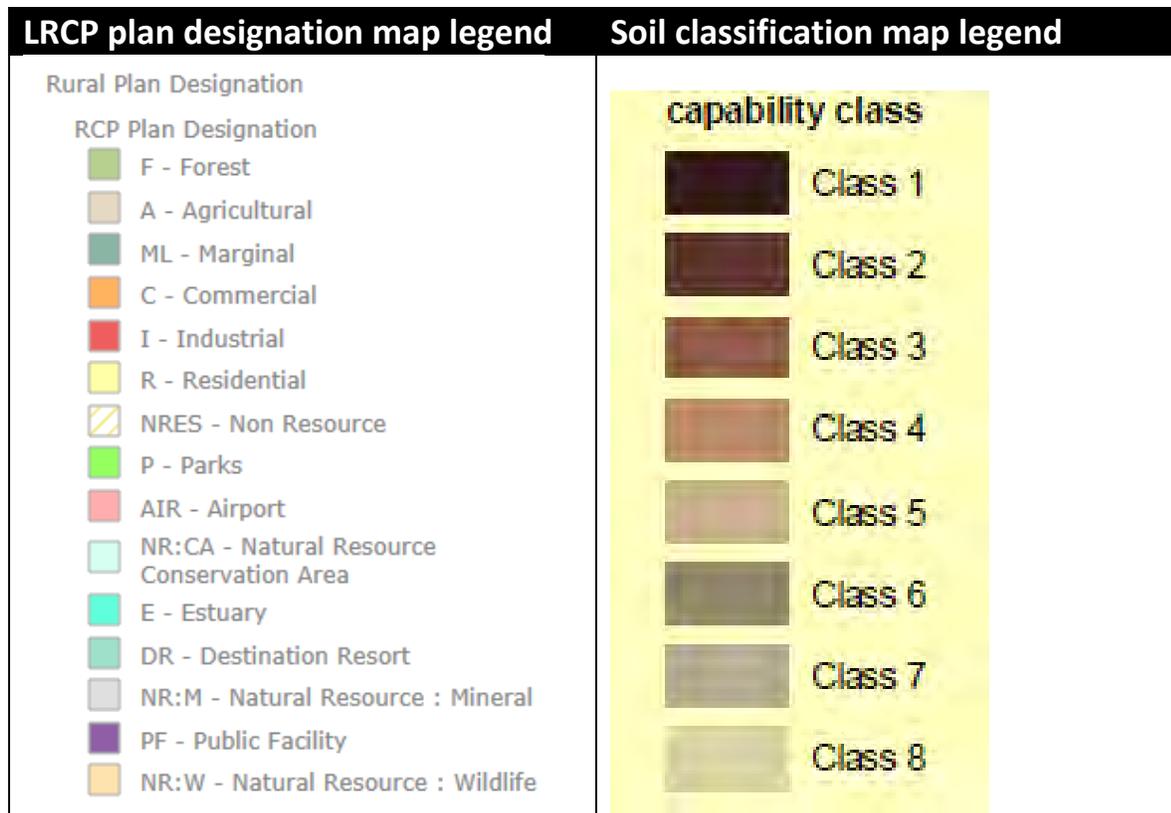
¹ CIBL/EOA pp. iii-iv, pages 82-95, Appendix C., pages 167-178.

² Context photos are screenshots from Bing maps accessed March 10-11 via links in RLID.

³ <http://lcmmaps.lanecounty.org/LaneCountyMaps/ZoneAndPlanMapsApp/index.html>

accessed March 10, 2016

⁴ land designated Agriculture in the Metro Plan west of I-5 is shown in a different brown map color and is indicated by an “A” on the parcel. For example, the land west of I-5 west of the North Gateway study area and west of Armitage Rd. is designated “Agriculture” in the Metro Plan and zoned EFU30.



Where shown, the red line in the small maps below is the UGB.

The City’s findings describe or map all of the alternative resource land areas evaluated in the boundary location alternatives analysis as required by OAR 660-024-0060(6). The City’s analysis involves more than one parcel or area within a particular priority category in ORS 197.298 for which circumstances are the same, so as permitted under OAR 660-024-0060(6), the City is allowed to consider and evaluate these parcels or areas as a single group. The City analyzed parcels within a priority category by capability classification groupings as permitted under OAR 660-024-0060(6).

In addition to the summary data compiled in Table 14, the record includes maps, acreage calculations and other evidence demonstrating that the City uniformly evaluated soils, parcelization, slopes, floodway, inventoried wetlands, waterways, and riparian resources on resource land parcels in the preliminary study area as factual basis to justify excluding ORS 197.298 lands parcels from further analysis.

Table 14: General Description of Fourth Priority Land

North Gateway



- The North Gateway preliminary study area consists solely of the land east of Interstate Highway 5 between the Springfield UGB and the McKenzie River. Lands east and north of the river are in the McKenzie View study area grouping.
- With the exception of the NW corner of the study area (Armitage Park), the North Gateway site is designated Agriculture.
- The area has large, potentially suitable parcels that abut the Springfield UGB and land designated Campus Industrial in the Metro Plan, including parcels 20 acres and larger.
- Area abuts and is highly visible from Interstate Highway 5.
- Area is flat with some slopes along the banks of the river, slough, freeway and the Sprague overpass

embankment

- Floodway, riparian resources and wetlands along the river and Maple Island Slough, hydric soils
- Entire study area is in the floodplain
- Soil classification is mixed. Area comprises Class II, IV, VII, and VIII. Predominantly Class II overall, with Class VII and VIII soils along the river and sloughs.
- The parcels adjacent to and abutting UGB in the southern portion of the area have higher priority for inclusion under ORS 197.298 because the tracts are not composed predominantly of soils classified as prime, unique, Class I or II and high value (ORS 215.710(3)(a)-(d):⁵
 - 1703154000 400 54% of tract is not high value farmland (Class II, IV, VII, VIII)
 - 17031000 2500 56% of tract is not high value farmland (Class II, IV, VII, VIII)
- 17031000 2400 89% of tract is high value farmland (Class II, IV and VIII)
- Parcels north of Sprague consist of predominantly high value soils – lower priority for expansion.
- Presence of hydric soils may indicate wetlands.
- Sensitive Drinking Water Protection Overlay zone: I-5 well (located on EWEB site)
- 1703154000 801 is developed with EWEB power electrical transmission facilities and Rainbow/SUB wells
- Accessed via Corporate Way from the south or via Gateway St. - North Game Farm Rd - Armitage Rd - Sprague Rd Overpass from the south or west.
- Area was identified by the CIBL Technical and Stakeholder Advisory Committees as a potential employment area worthy of further study in the Preliminary CIBL Analysis (2008-2009), and was included in draft alternatives reviewed by the Joint Planning Commissions and Springfield City Council.



1703154000 400



170310000 2500



170310000 2400

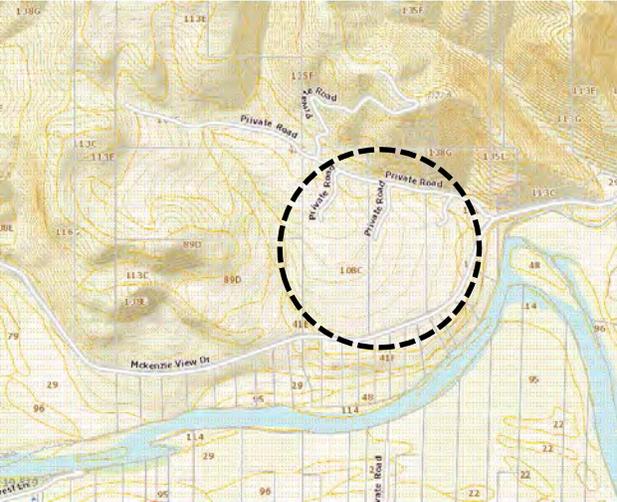
⁵ The City used RLID data to calculate % of soil units in a tract.

McKenzie View

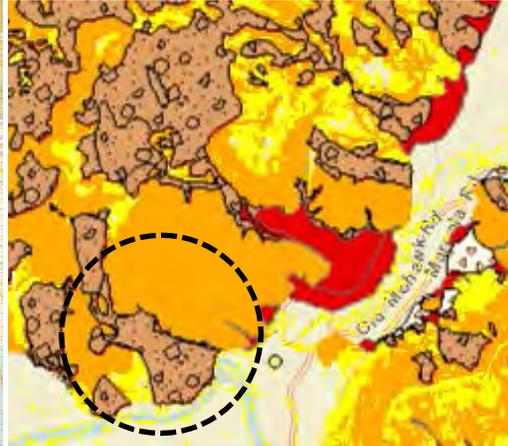


- The McKenzie View preliminary study area consists of the land north of the McKenzie River between Interstate Highway 5 and Marcola Road (Hayden Bridge).
- Land is across the McKenzie River from Springfield and no bridges exist between Interstate Highway 5 and Hayden Bridge/Marcola Rd.
- Fourth Priority lands are designated Agriculture and Forest.
- Soil classification is mixed. Area comprises Class I, II, III, IV, VI, VII, and VIII. Predominantly Class II soils along the river. Predominantly Class VI in the hills.
- Large parcels are across the river, none are adjacent to UGB.
- Slopes and soils:
 - Predominantly slopes >15% I-5 to Mohawk River on north side of McKenzie View Drive except one area of slopes <15% is shown on map, soil is Class VI (108C- Philomath 3-12% slopes)
 - 17021800 402
 - 17021800 403

- 17021800 404
- Slopes 15% or less I-5 to Mohawk River on south side of McKenzie View Drive Lands slopes are predominantly Class II
- DOGAMI mapped landslide hazards in Coburg Hills
- Floodway, riparian resources and wetlands along the river
- accessed via Coburg Rd - McKenzie View Drive; or from Marcola Road - Old Mohawk Road - Hill Road - McKenzie View Drive.



McKenzie View site topography and Cl. VI soil



McKenzie View site DOGAMI hazards

Oxbow/Camp Creek



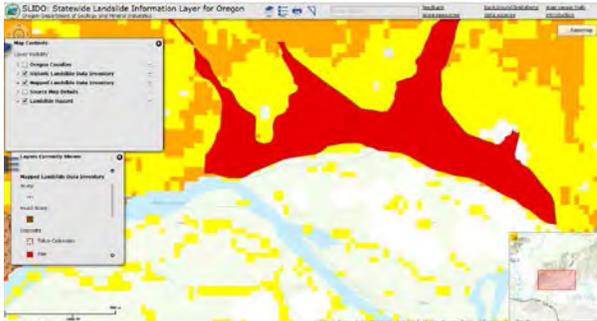
- The Oxbow/Camp Creek preliminary study area consists of the land north of the McKenzie River between Marcola Road (Hayden Bridge) and Hendricks Bridge, excluding the Mohawk Valley.
- Land is across the McKenzie River from Springfield and no bridges exist between Interstate Highway 5 and Hayden Bridge/Marcola Rd.
- Fourth Priority lands are designated Agriculture and Forest.
- Soil classification is mixed. Area comprises CI I, II, II, IV, VI, VII, VIII soils. Predominantly Class II soils along the river. Predominantly Class VI in the hills. Some Class I along Upper Camp Creek.
- Large, unconstrained parcels are located across the river, not adjacent to UGB.
- Large unconstrained parcels south of Camp Creek Road are predominantly Class II soils.
- Unconstrained portions of parcels north of Camp Creek Road are predominantly Class III soils (105A Pengra 1-4% slopes, and Class VI 108F Philomath 12-45% slope)
 - 17022200 200 approx. 31 acres Class III, slopes 15% or less (4% 105A), EFU
 - 17022200 103 approx. 11 acres Class III, slopes 15% or less (105A – Pengra 1-4% slopes, 113E, 102C), EFU
 - 17022300 300 approx. 6.8 acres Class III, slopes 15% or less (105A – Pengra 1-4% (105A – Pengra 1-4% slopes, 47% 108C Philomath, EFU, BPA easement
- Large unconstrained parcels west of Upper Camp Creek Road are Class I, II and III soils lower priority for expansion
- DOGAMI mapped landslide hazards in Coburg Hills
- riparian resources and wetlands along the McKenzie River

- accessed via Marcola Road – Camp Creek Road from the south; or via Hendricks Bridge – Millican Road – Camp Creek Road from the east; or via Coburg Road – McKenzie View Drive – Old Mohawk Road – Mohawk Road
- Armitage Rd - Sprague Rd overpass - McKenzie View Drive, or from Marcola Road - Old Mohawk Road - Hill Road - McKenzie View Drive.



17022200 200

17022200 103



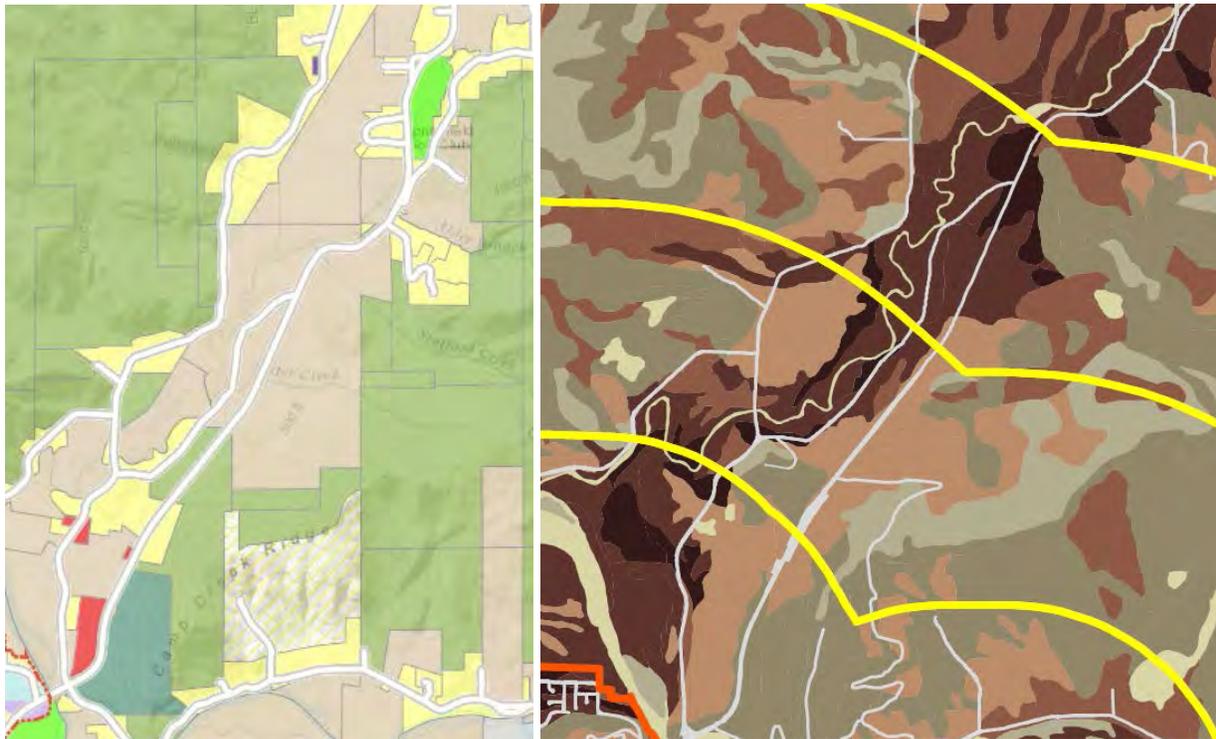
DOGAMI mapped landslide hazards north of Camp Creek Rd.

Hayden Bridge



- The Hayden Bridge preliminary study area consists of the land between the UGB and the McKenzie River extending between the vicinity of Harvest Lane and Marcola Road and the Springfield UGB and the McKenzie River.
- Entire area is designated Agriculture.
- Part of a larger block of agricultural land that extends north of the McKenzie River into the McKenzie View and Mohawk study areas
- Predominantly Class II soils. Area comprises Class II, III and IV.
- The area has large parcels that abut and are split by the Springfield UGB along Hayden Bridge Road, including several parcels larger than 20 acres.
- The area abuts urbanizable land designated for and developed with urban and urbanizable Low Density Residential uses.
- Topography is flat.
- Floodway, riparian resources and wetlands along the river
- Drinking Water Protection Overlay District: Pierce and Chase wells
- Accessed via Hayden Bridge Road and Harvest Lane
- Lower priority for inclusion under ORS 197.298 because parcels consist of predominantly high value soils.

Mohawk



- The Mohawk preliminary study area consists of the land north of the McKenzie River along Marcola Road (Hayden Bridge)
- Land is across the McKenzie River from Springfield
- Fourth Priority lands are designated Agriculture and Forest.
- Large parcels are across the river, not adjacent to UGB
- DOGAMI mapped landslide hazards in Coburg Hills and Camp Creek Ridge
- Floodway, riparian resources and wetlands along the McKenzie and Mohawk Rivers
- Presence of hydric soils
- accessed via Marcola Road – Camp Creek Road from the south; or via Hendricks Bridge – Millican Road – Camp Creek Road from the east; or via Coburg Road – McKenzie View Drive – Old Mohawk

Road – Mohawk Road

- Armitage Rd - Sprague Rd overpass - McKenzie View Drive, or from Marcola Road - Old Mohawk Road - Hill Road - McKenzie View Drive.
- Predominantly forestland
- Agricultural soil classification is mixed. Predominantly Class II with some Class I along the Mohawk and McKenzie Rivers. Area comprises Class I, II, III, IV, VI, and VII.
- Part of larger block of agricultural land that includes the Hayden Bridge and McKenzie View areas
- Large, unconstrained parcels west of Mohawk Road have Class I/II soils; and Class II/III (130 Waldo High Value), 1A Abiqua, 78 McAlpin High Value
- Large unconstrained parcels east of Mohawk Road are Class IV soils: predominantly 85 Natroy High Value/78 McAlpin High Value
- Lower priority for inclusion under ORS 197.298 because unconstrained large parcels consist of predominantly high value capability class soils.
- Presence of hydric soils may indicate wetlands.
- Area was identified by the CIBL Technical and Stakeholder Advisory Committees as a potential employment area worthy of further study in the Preliminary CIBL Analysis (2008-2009), and was included in draft alternatives reviewed by the Joint Planning Commissions and Springfield City Council.

North Springfield Highway



- The North Springfield Highway preliminary study area consists of the land between the UGB and the McKenzie River west to east between the Oxbow and Ruff Park, and extending north-south between the Springfield UGB and the McKenzie River.
- Entire area is designated Agriculture.
- part of a larger block of agricultural land that extends on both sides of the McKenzie River west into the McKenzie View and Mohawk study areas an east to the Far East study area.
- Predominantly Class II soils. Area comprises Class I, II, III, IV, VII soils.
- The area has very large parcels (predominantly Class II, mixed with I, II and IV) that abut the Springfield UGB along High Banks Road at 52nd Street
- The parcels adjacent to and abutting UGB in the southern portion of the area have lower priority for inclusion under ORS 197.298 because they consist of predominantly high value soils.
- The area abuts land in the UGB designated for and developed with Heavy Industrial (Bluewater Boats),

Low Density Residential and Park uses.

- Slopes are flat.
- Floodway, riparian resources and wetlands along the river
- Floodplain
- Drinking Water Protection Overlay zone: Plat 1 and 2 wells
- Convenient access to Interstate Highway 5 via Interstate Highway 105/State Highway 126B at 52nd Street
- 52nd Street (inside the UGB from the south to High Banks Rd.) is classified as a Major Collector Street in the TSP. High Banks Road between 52nd and 58th is classified as a Major Collector Street in the TSP.
- Filbert orchards
- Area was identified by the CIBL Technical and Stakeholder Advisory Committees as a potential employment area worthy of further study in the Preliminary CIBL Analysis (2008-2009), and was included in draft alternatives reviewed by the Joint Planning Commissions and Springfield City Council.
- Area has suitable large parcels larger than 20 acres.



Floodway extent (area in solid pink color)

Thurston

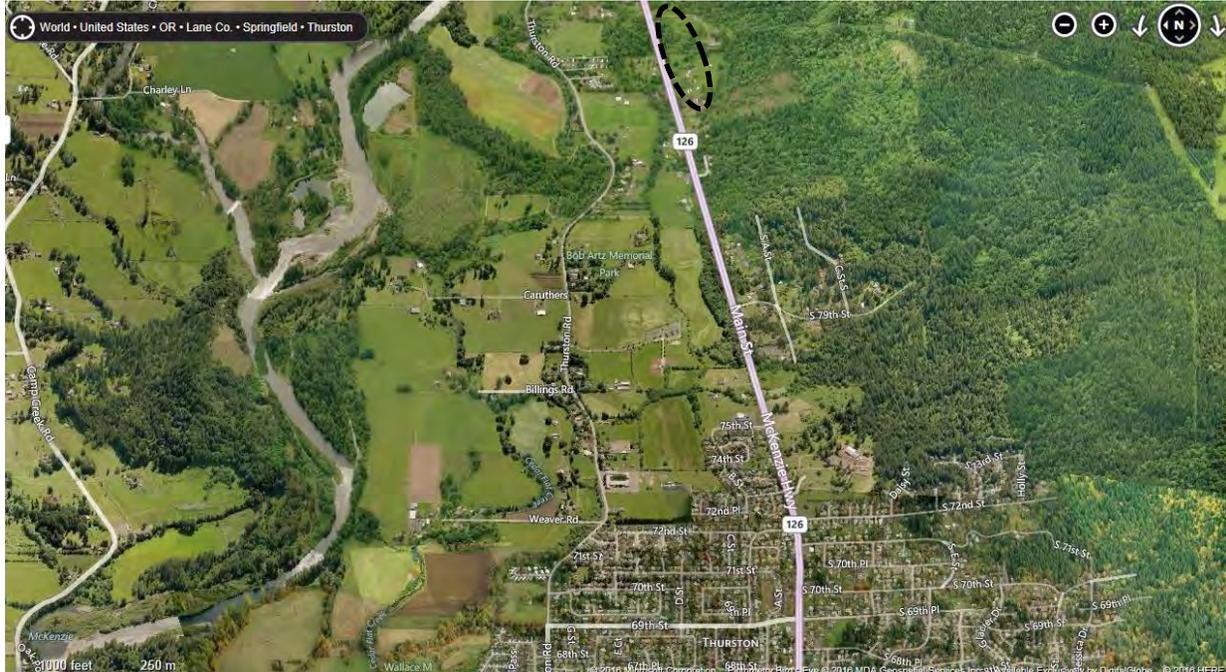


- Abuts UGB
- Part of a large block of agricultural land.
- Soils capability classification is mixed. Area comprises Class I, II, IV and VII, predominantly Class II.
- Constrained by floodway, riparian resources (McKenzie River, Cedar Creek), wetlands
- Drinking Water Protection Overlay District: Thurston, Thurston Middle School, Platt 1 and Platt 2 wells
- Lower priority for inclusion under ORS 197.298 because parcels consist of predominantly high value soils.



Floodway extent (solid pink color)

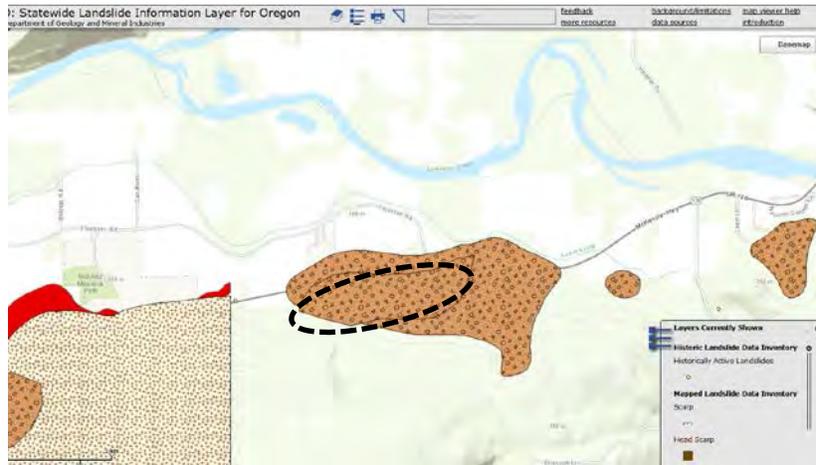
Far East



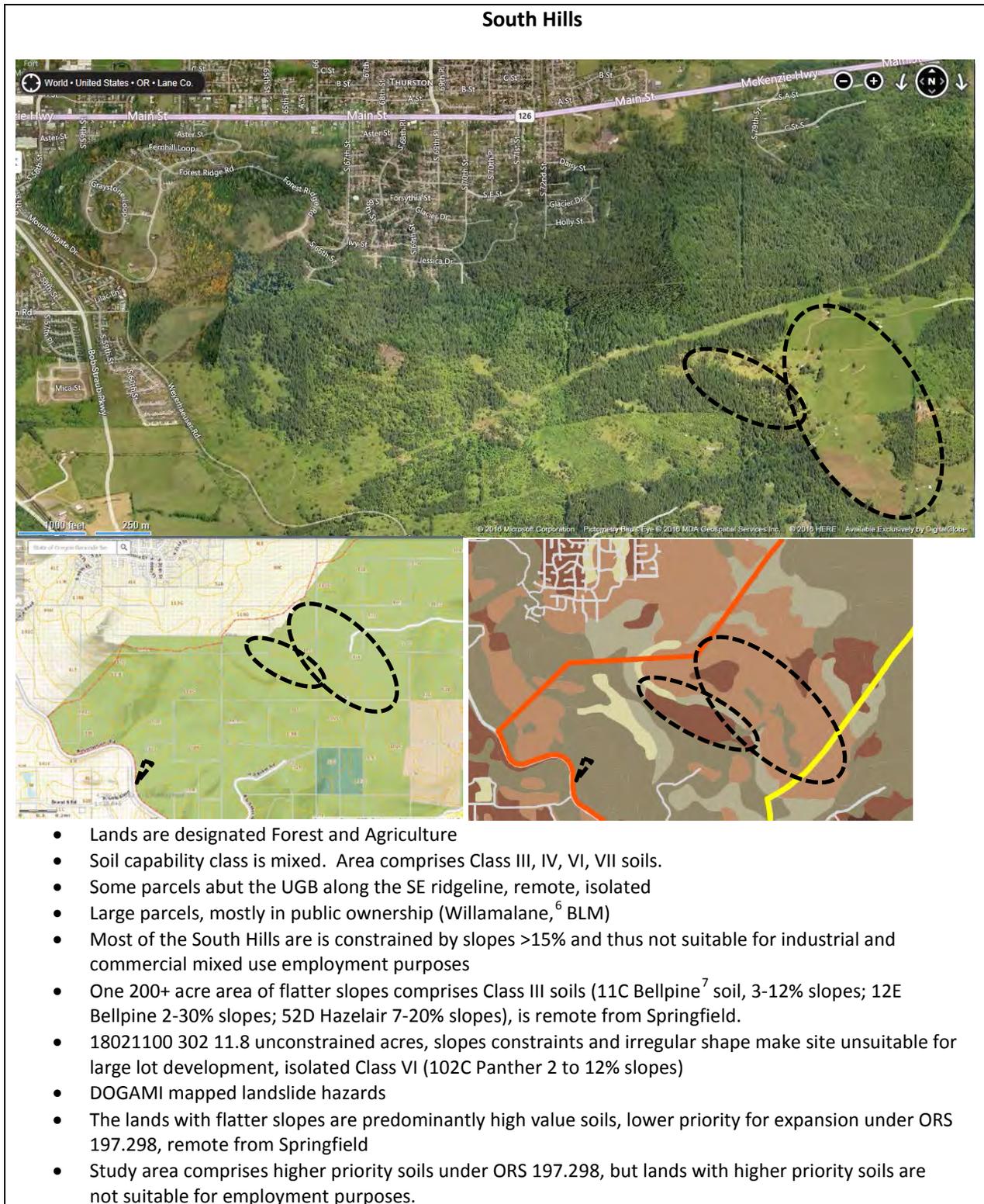
- Area comprises Class I, II, III, IV, VI, VI, VII, VIII soils; predominantly Class II and flat topography north of Highway 126; predominantly Class IV south of Highway 126 constrained by slopes 20-30%; (52D Hazelair 7-20 % slopes)
- Large Agriculture parcels 6-13 acres in size north of Highway 126 comprise predominantly Class I and II soils.
- Most of the lands south of Highway 126 are sloped 15% or greater. Forest parcels 6-24 acres in size on the south side comprise Class IV soils and are constrained by slopes. Portions of (5) Forest parcels have slopes 15% or less in the area indicated on the maps above.
- DOGAMI landslide hazards
- Floodway north of Cedar Creek, riparian resources McKenzie River, Cedar Creek
- Drinking Water Protection Overlay District: Thurston Middle School and Thurston wells
- Sand and Gravel natural resources
- Adjacent City Low Density Residential development, and County Rural residential development, mobile home park
- Unconstrained large parcels (north of Highway 126) are lower priority for expansion under ORS 197.298

based on predominance of Class I and II soils.

- The area north of Highway 126 was excluded on the basis of soils capability classification.
- Unconstrained large parcels (south of Highway 126) are higher priority for expansion under ORS 197.298, but slopes 7-35% exceed suitability for industrial and commercial mixed use office development. This area was excluded on the basis of specific land needs (197.298(3)(a)) because sloped topography greater than 7% is not suitable for the needed uses.



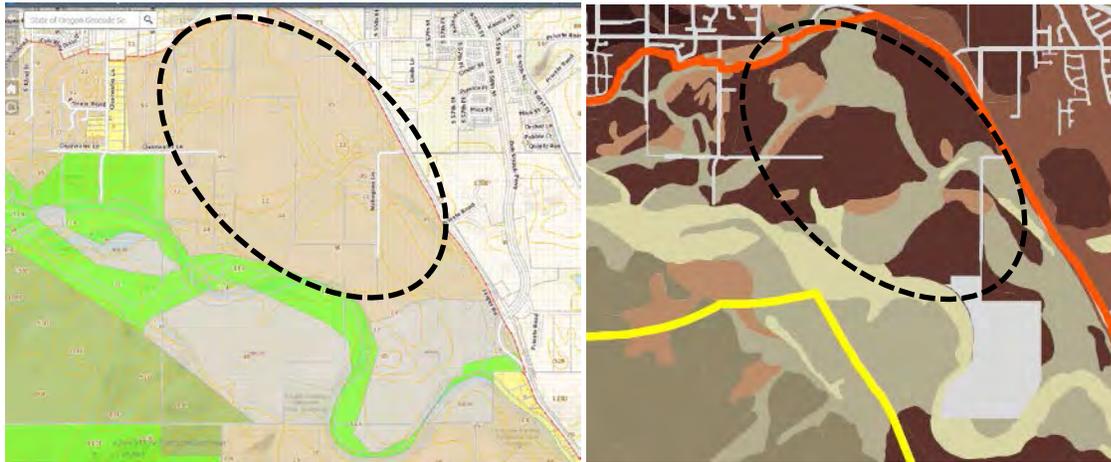
DOGAMI mapped landslides



⁶ The Willamalane parks and open space acquisition includes 232 acres outside the UGB, described in Willamalane *Draft Thurston Hills Natural Area Management Plan*, March 2016, pp. 1-12 and “Map 1.”

⁷ Class III Bellpine is identified in OAR 660-033-0030(8)(a) as meeting the definition of “High Value Farmland”

West Jasper/Mahogany



- Study area includes large parcels designated Agriculture
- Floodway, riparian resources and wetlands along the Middle Fork Willamette River
- Flood plain
- Agricultural capability classification is mixed. Area comprises Class II, IV, VII, and VIII.
- Predominantly flat topography
- Wetlands, hydric soils
- Study area includes productive farmland
- 2 BPA easements cross the study area
- Suitable large parcels abut UGB along Jasper Road, including parcels larger than 20 and 50 acres
- EFU tracts comprising predominantly CI II high value soils, lower priority for expansion⁸:

⁸ See detailed maps in the record: West Jasper/Mahogany study area

- 18020400 1600
- 18020400 2701
- 18020900 2600
- 18020100 500
- 18020900 1402
- 18020900 1403
- 18020800 200
- (5) EFU tracts are not predominantly high value farmland, higher priority for expansion:
 - 18020900 200 (62.4 acres): 53% cl VII and VIII, 44% CI II
 - 18020900 301 (8.4 acres) 64% CI VII, 17% CI III, 10% CI VIII water, 9% CI II
 - 18020900 203 (22.7 acres): 78% CI VII, 8% CI VIII water, 12% CI III, 2% CI II
 - 18020400 2401 (6.1 acres): 28% CI VII, 26% CI III, 46% CI II
 - 18020400 3000 (54.5 acres):
- 18020900 1300 is public land: Oregon Dept. of State Lands
- Proximate (across Jasper Road) to un-annexed land designated for Industrial uses inside the UGB (Jasper-Natron) and land within the City Limits that is planned and partially developed with residential uses (Jasper Meadows), school and park uses.
- Area was identified by staff (2013) as a potential employment area worthy of further study in the UGB Study Area and was included in draft alternatives reviewed by the Springfield City Council in 2013-2014.



18020400 3000



18020400 2701



18020400 2401



18020900 203

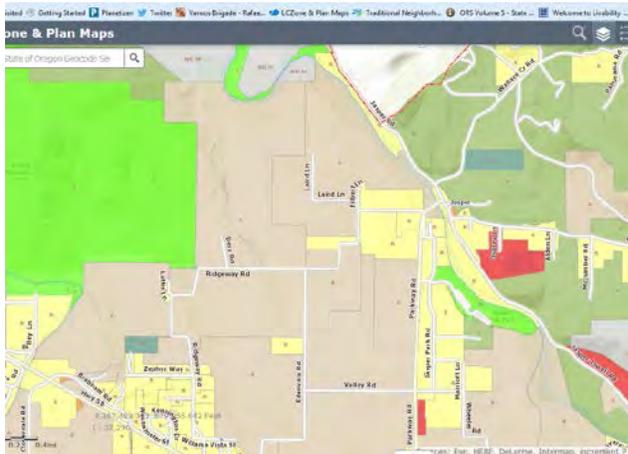


18020900 200



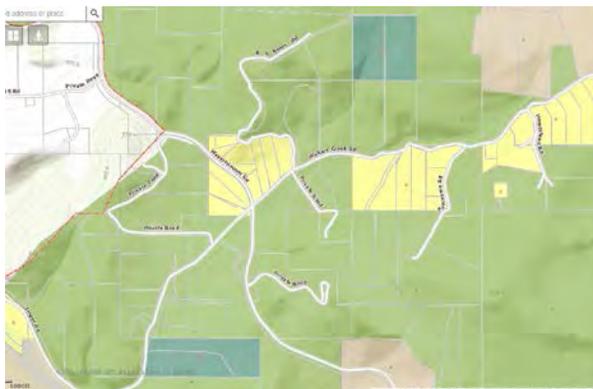
18020900 301

Jasper Bridge



- Study area includes large parcels designated Agriculture
- Floodway, riparian resources and wetlands along the Middle Fork Willamette River
- Flood plain
- Agricultural capability classification is mixed. Area comprises Class I, II, II, and IV. Predominantly Class II.
- Productive farmland
- Predominantly flat topography
- Wetlands
- Large block of Class I and II soils – lower priority for expansion under ORD 197.298

Wallace Creek



- Designated Forest
- Abuts UGB along ridgeline
- Constrained by slopes >15%
- Soil capability class is mixed. Area comprises Class II, III, IV, VI, VII soils.
- Philomath 3-12% (olive green), McAlpin (intersection w/ Wey. Rd.) HazelAire 2-7%
- Flatter slope areas are Class II, III and IV soils.
 - 1802140000 801: 52% CI II and III (Bellpine HV), lower priority for expansion
 - 1802140000 501: 79% CI II, lower priority
 - 1802140000 905: 50% Class III (Bellpine HV), low priority, slopes 12-20%

 - 1802140000 900: 51% CI VI, 49% CI. II (inc. 41% Bellpine CI III HV)
 - 1802140000 800: 66% CI III, 28% CI VI, 6% CI II
 - 1802140000 500: 46% CI III, 28% CI VI, 14% CI IV, 11% CI II, 1% CI VI
 - 1802140000 903: 89% CI III, 7 ac. wetland

- 1802140000 902: 94% CI III
- 1802140000 1303: 19 ac. 77% CI VI



1802140000 900



1802140000 800



1802140000 500



1802140000 902 & 903



1802140000 1303

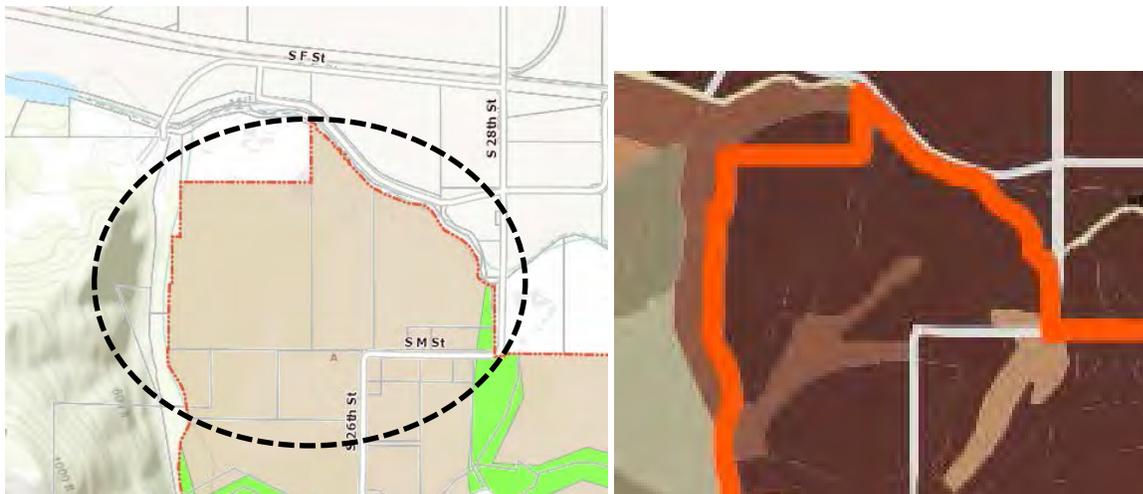


Slopes >15%



Hydric soils and NWI wetlands

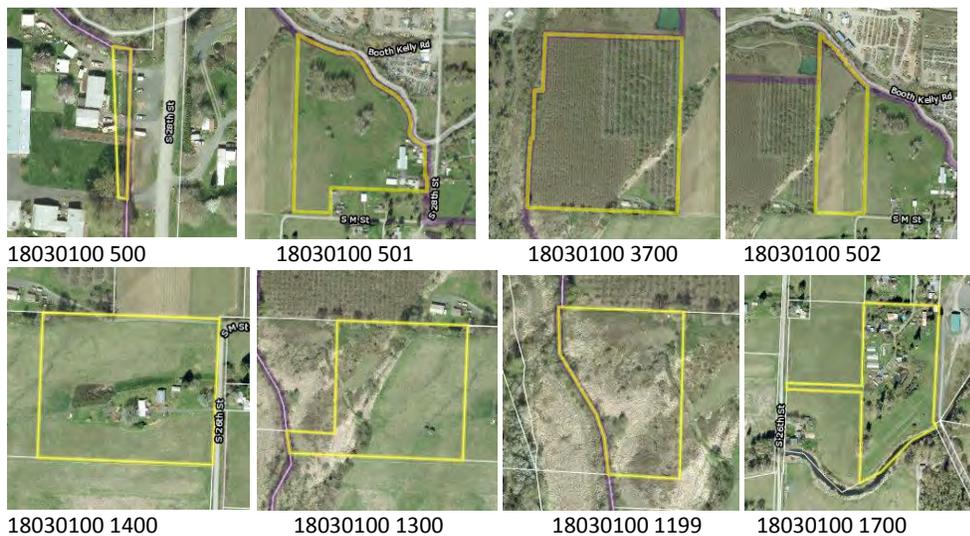
Mill Race



- The Mill Race preliminary study area grouping consists of the land south of the UGB along South 28th, South M and South 26th Streets. Area is immediately east of Springfield/Quarry Butte and south of the Mill Race, a tributary of the Willamette River. The land to the west is an operating rock quarry (Knife River).
- The Mill Race employment land study area grouping is designated Agriculture. The area abuts publically-owned and privately-owned land designated Agriculture and Parks.
- The area has large, potentially suitable parcels including parcels 20 acres and larger that abut the Springfield UGB and land inside the UGB that is designated, zoned and developed Heavy Industrial.
- Area is flat with some slopes along the banks of the Mill Race
- riparian resources and wetlands along the Mill Race and other waterways
- portions of study area are in the floodplain
- Highly sensitive Drinking Water Protection Overlay zone and immediately adjacent to SUB Willamette

Wellfield, Springfield’s primary drinking water source.

- Soil classification predominantly Class II overall, with some Class III and IV.
- Lower priority for expansion under ORS 197.298.
- Not excluded due to its location immediately adjacent to existing industrial land inside the UGB, its proximity to existing truck routes, public transit, and rail facilities, and presence of a 57-acre tract (in SUB’s ownership) and a 21.1 acre tract comprising developable land not outside of the flood plain.
- SUB Tract (57.2 acres) abuts SUB land inside the UGB, abuts Swanson Mill site (currently being re-built and upgraded after the 2014 fire), and has access easements through to F Street.⁹
 - 18030100 3700/18030100 502
- 18030100 501 abuts UGB is a 20-acre site, abuts UGB
- Smaller 5-10 ac sites in study area:
 - 18030100 1400/ 18030100 1300/ 18030100 1199
 - 18030100 1700
 - 18030100 1701/18030100 1702
- Access to the area to and from Interstate Highway 5 is via South 28th Street, classified as a Major Collector in the TSP; and South M and South 26th (Lane County road); and South F Street (via SUB access easement on Swanson property)— a Local Street in the TSP.
- Area was identified by the CIBL Technical and Stakeholder Advisory Committees as a potential employment area worthy of further study in the Preliminary CIBL Analysis (2008-2009), and was included in draft alternatives reviewed by the Joint Planning Commissions and Springfield City Council.



⁹ See 4-29-14 email from SUB General Manager Jeff Nelson to staff Pauly: “when SUB purchased the KR property, SUB made sure that emergency vehicles can access through KR’s property via the Swanson easement (for all the area, not just the three parcels) to comply with the Fire Marshall’s requirements for emergency vehicle access circulation.” See letters from SUB General Manager Jeff Nelson, dated 9-10-13 and 5-1-14 to Springfield Mayor and Council regarding SUB’s request to bring the tract purchased from Knife River into the UGB to be designated for employment uses; thus the City assumed this publicly-owned land is a candidate site for inclusion in the UGB to meet employment land needs.



18030100 1701

18030100 1702

Seavey Loop



- Designated Agriculture
- Soil capability class is mixed. Area comprises Class II, III, IV, and VI, soils.
- Soils predominantly Class II, and Class III and IV High Value and Prime (same priority as Cl II), lower priority for expansion
- Part of a larger block of high value agricultural land
- Tracts with Class VI soils are constrained by slopes and very restrictive BPA easements.
- North and Eastern portions of study area are entirely in the floodway.
- Hydric soils
- Area contains parcel larger than 20 acres, including a multiple-parcel tract of land owned by one family, but parcels comprise predominantly High Value Ag. soils, lower priority for expansion.

- 18031410 300: 62% High Value Ag.
- 18031410 1305: 74% High Value Ag
- 18021410 1400: 100% High Value Ag
- 18031100 1600: 100% High Value Ag
- 18031130 3900: 61% High Value Ag
- 18031410 306: 77% High Value Ag
- 18031410 307: 74% High Value Ag
- 18031410 305: 100% High Value Ag
- 18031100 1604: 81% High Value Ag

- 18031410 1401: 36% High Value Ag, higher priority for expansion, 5 ac.

- NOTE: One EFU tract 18031440 501, 504 and 505 (20.1 ac.) is completely surrounded by exception land and I-5, and does not comprise predominantly high value ag soils, thus is considered second priority land. This tract is constrained by slopes and very restrictive BPA easements and was excluded from consideration.
- See additional description of this Study Area under Second Priority Exception Areas
- Area was identified by the CIBL Technical and Stakeholder Advisory Committees as a potential employment area worthy of further study in the Preliminary CIBL Analysis (2008-2009), and was included in draft alternatives reviewed by the Joint Planning Commissions and Springfield City Council.



¹⁰ It should be noted that the Alvey Substation located south of this area “is a high voltage substation hub for BPA’s high voltage transmission network 115kV and above. It is not a distribution substation. Lines go out of BPA’s substation that feed to local distribution substations that transform the voltage from 115kV to a lower distribution voltage.” “If a large user were to locate in the College View area, they would not receive service directly from BPA’s substation, however a new High Voltage to Low Voltage distribution network substation could be built.” (email from Jeff Nelson to staff Pauly, SUB, 9-11-14)



Floodway extent

Clearwater



- Designated agriculture
- Potentially suitable parcels including parcels 10 and 20 acres and larger parcels that abut the Springfield UGB and land inside the UGB that is designated, zoned and developed Low Density Residential
- Area is flat with some slopes along the banks of the Middle Fork Willamette river
- Riparian resources and wetlands along the river and Mill Race and Gorrie Creek
- Portions of study area are in the floodplain; floodway along the river
- Sensitive Drinking Water Protection Overlay zone and near SUB's Willamette Wellfield, Springfield's primary drinking water source.
- Soil classifications are mixed, predominantly Class II overall, with some Class IV and VII.
- Public parkland in the vicinity
- Hydric soils
- Parcels comprising <50% High Value Ag soils
 - 18020800 100 (16.2 acres) 54% non high value (Cl. VIII, II VII)
 - 18020500 2801 (29 ac.)* 58% non high value (Cl VII, VI, II)

- 18020500 1928 (10 ac.)* 33% CI VII, 34% CI IV, 33% CI II
- Parcels comprising more than 50% High Value Ag soils:
 - 18020500 2800 (39.5 ac.) 63% CI II, low priority for expansion
 - 18020500 2600 (22 ac.)* 72% CI II, low priority for expansion
 - 18020500 2202 (21 ac.)* 96% CI II, low priority for expansion
 - 18020500 1900 (10.3 ac.)* 80% CI II, low priority for expansion
 - 18020500 1708 (5.8 ac.)* 66% CI II, low priority for expansion
 - 18020500 1800 (36 ac.)* 63% CI II, low priority for expansion
 - 18020600 4202 (21 ac.)* 73% CI II, low priority for expansion
- 18020500 1909, 18020600 1001 are public land owned by Springfield School District
- Area was identified by the RLS and CIBL Technical and Stakeholder Advisory Committees as a potential future residential expansion area but not suitable for industrial and commercial development.



PRIORITIZE FOURTH PRIORITY AGRICULTURAL AND FOREST LANDS ON THE BASIS OF CAPABILITY CLASSIFICATION

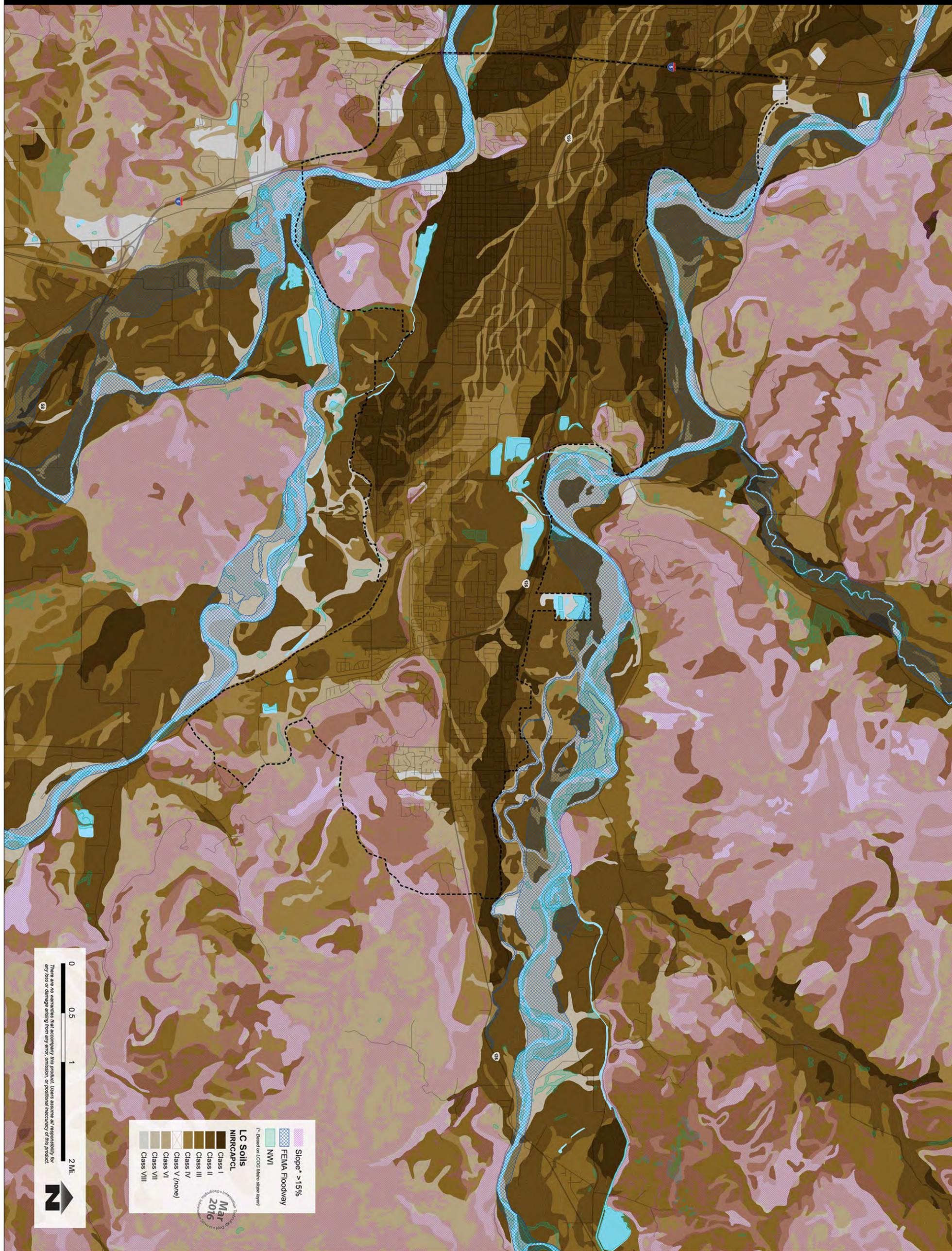
ORS 197.298(2):

“Higher priority shall be given to land of lower capability as measured by the capability classification system or by cubic foot site class, whichever is appropriate for the current use.”

The City conducted an area-wide high level assessment of soil capability classification to determine and compare the capability classification system or by cubic foot site class of lands adjacent to the UGB that are designated for agriculture, forestry or both.

Table 14 above provides additional information to compare general soil classifications between the study area groupings and parcels within groupings.

SPRINGFIELD 2030 REFINEMENT PLAN: Soil Capability and Constraints



Analysis of Capability Classification in the Springfield UGB Study Area [ORS 197.298(2)]

This section of the report explains how the City addressed ORS 197.298 (1)(d) and (2) when the City identified the capability classifications of soils found in the potential urban growth areas surrounding Springfield's UGB, and when the City mapped the UGB study area to analyze fourth priority lands designated for agriculture and forestry in the Lane Rural Comprehensive Plan. As supported by ample evidence in the record documenting the City's iterative planning process beginning in 2008, the City's UGB location alternatives analysis examined capability classifications of all land surrounding the UGB in the initial, preliminary and final stages of the UGB study area alternatives analysis.

Methodology. The capability classifications mapping for the initial analysis included all land in the vicinity of the UGB, and extending several miles out to the north, east and south.¹¹ To compare and evaluate land under ORS 197.298 (1)(d) and (2), the City used the United States Department of Agriculture Natural Resources Conservation Service (NRCS) Lane County Soil Survey data to prepare maps of the lands adjacent to the UGB depicting soil classifications I through VIII.¹² These maps provided the factual base for conducting analysis to determine the location of prime agricultural soils and the geographic relationship of those soils to the existing UGB and potential UGB expansion areas.

In addition to providing a factual basis for the City's prioritization of lands designated for agriculture and/or forestry by capability classification, this section of the report provides evidence and findings to address the City's analysis under Goal 14, Boundary Location Factor 4 for comparing land groupings within the fourth priority under ORS 197.298; and to justify the City's ultimate choice of expansion areas under Goal 14, Boundary Location Factor 4 — balanced with the other Goal 14, Boundary Location Factors.

As stated on the USDA NRCS Soils website, a published soil survey is a detailed report on the soils of an area. The soil survey has maps with soil boundaries and photos, descriptions, and tables of soil properties and features. Soil surveys are used by farmers, real estate agents, land use planners, engineers and others who desire information about the soil resource.¹³

Land Capability Classification is defined in the NRCS Technical Reference NSSH Part 622.02:

- a. *“Definition. Land capability classification is a system of grouping soils primarily on the basis of their capability to produce common cultivated crops and pasture plants without deteriorating over a long period of time.*
- b. *Classes. Land capability classification is subdivided into capability class and capability subclass nationally. Some States also assign a capability unit.*

¹¹ Lands west of Interstate Highway 5 were assumed to be within the City of Eugene's jurisdictional area as described in the Metro Plan and were not included in Springfield's analysis.

¹² Map 4: Study Area Soil Class, City of Springfield, OR, ECONorthwest, December 2008

¹³ USDA NRCS website http://www.nrcs.usda.gov/wps/portal/nrcs/detail/soils/survey/?cid=nrcs142p2_053375, accessed 12-15-15.

- c. *Significance. Land capability classification has value as a grouping of soils. National Resource Inventory information, the Farmland Protection Policy Act, and many field office technical guides have been assembled according to these classes. The system has been adopted in many textbooks and has wide public acceptance. Some State legislation has used the system for various applications. Users should reference [Agriculture Handbook No. 210](#) for a listing of assumptions and broad wording used to define the capability class and capability subclass.*
- d. *Application. All map unit components, including miscellaneous areas, are assigned a capability class and subclass. Agriculture Handbook No. 210 provides general guidance, and individual State guides provide assignments of the class and subclass applicable to the State. Land capability units can be used to differentiate subclasses at the discretion of the State. Capability class and subclass are assigned to map unit components in the official soil survey database.”¹⁴*

As stated in the National Soil Survey Handbook, Part 622 (00-Exhibit 1), USDA, NRCS:

“Capability units are soil groups within a subclass. The soils in a capability unit are enough alike to be suited to the same crops and pasture plants, to require similar management, and to have similar productivity. Capability units are generally designated by adding an Arabic numeral to the subclass symbol, for example, 2e-4 and 3e-6. The use of this category of the land capability classification is a state option. This category of the system is not stored in the NRCS soil survey database.”¹⁵

As stated in the Forward to the Agriculture Handbook No. 210 p. iii:

“Since soil surveys are based on all the characteristics of soils that influence their use and management, interpretations are needed for each of the many uses.”¹⁶

and

“In using the capability classification, the reader must continually recall that it is an interpretation. Like other interpretations, it depends on the probable interactions between the kind of soil and the alternative systems of management. Our management systems are continually changing. Economic conditions change. Our knowledge grows. Land users are continually being offered new things, such as new machines, chemicals, and plant varieties.”¹⁷

and

“The new technology applies unevenly to the various kinds of soil. Thus the grouping of any one kind of soil does not stay the same with changes in technology. That is, new combinations of practices increase the productivity of some soils more than others, so some are going up in scale whereas others are going down, relatively. Some of our most

¹⁴ National Soil Survey Handbook, Part 622, USDA, NRCS
http://www.nrcs.usda.gov/wps/portal/nrcs/detail/soils/ref/?cid=nrcs142p2_054226#ex6 accessed 12-16-15.

¹⁵ National Soil Survey Handbook, Part 622 (00-Exhibit 1), USDA, NRCS, provided to staff by Eugene USDA/NRCS District Conservationist Tom Burnham, 12-16-15.

¹⁶ Agriculture Handbook No. 210, Land Capability Classification, USDA Soil Conservation Service,

¹⁷ Ibid.

productive soils of today were considered poorly suited to crops a few years ago. On the other hand, some other soils that were once regarded as good for cropping are now being used more productively for growing pulpwood. These facts in no way suggest that we should not make interpretations. In fact, they become increasingly important as technology grows. But these facts do mean that soils need to be reinterpreted and regrouped after significant changes in economic conditions and technology.”¹⁸

and

“...other important interpretations are made of soil surveys. Examples include groupings of soils according to crop-yield predictions, woodland suitability, range potentiality, wildlife habitat, suitability for special crops, and engineering behavior. Many other kinds of special groupings are used to meet local needs.”¹⁹

The City used NRCS SSURGO data to map soils and their capability classifications.²⁰ Staff contacted Cory Owens, USDA NRCS State Soil Scientist²¹ to confirm that the capability classifications I-VIII in the SSURGO data base are a component of the official soil survey database.

For more detailed study area and parcel-level analysis, the City applied the NRCS SSURGO map data to the City’s maps of study areas.²² The City also accessed NRCS soils data from the Regional Land Information Database (RLID) in Lane County and accessed soil map units on a parcel by using the Lane County Plan and Zone online Map viewer. Soils information in RLID is derived by overlay of Lane County regional GIS taxlot layer with soil units mapped by USDA Natural Resource Conservation Service (NRCS). In addition to the names and relative extents of the soil “map units” which occur on the taxlot, limited soil characteristics are displayed in RLID. For Lane County, the RLID data shows the name and number of the soil map unit and the percentage of each mapped soil unit on a parcel. In addition to GIS analysis of the NRCS data, the City utilized the parcel-based soils data in RLID in the boundary alternatives analysis. In RLID, the “Ag Class” value (formally known as Non-Irrigated Land Capability Class) represents the dominant capability class, under non-irrigated conditions, for each map unit, based on composition percentage of all components in the map unit. Land capability classification relates to the suitability of soils for most kinds of field crops. Capability classes are designated by the numbers I through VIII, which indicate progressively greater limitations and narrower choices for practical use:

Class I soils have few limitations that restrict their use.

Class II soils have moderate limitations that reduce the choice of plants or that require moderate conservation practices.

Class III soils have severe limitations that reduce the choice of plants or that require special conservation practices, or both.

¹⁸ Ibid.

¹⁹ Ibid.

²⁰ NRCS Lane County Soil Survey

²¹ telephone communication between staff Pauly and NRCS staff Cory Owens, 12-17-15

²² Email from staff Mike Engelmann to staff Pauly, 12-17-15

Class IV soils have very severe limitations that reduce the choice of plants or that require very careful management, or both.

Class V soils are subject to little or no erosion but have other limitations, impractical to remove, that restrict their use mainly to pasture, rangeland, forestland, or wildlife habitat.

Class VI soils have severe limitations that make them generally unsuitable for cultivation and that restrict their use mainly to pasture, rangeland, forestland, or wildlife habitat.

Class VII soils have very severe limitations that make them unsuitable for cultivation and that restrict their use mainly to grazing, forestland, or wildlife habitat.

Class VIII soils and miscellaneous areas have limitations that preclude commercial plant production and that restrict their use to recreational purposes, wildlife habitat, watershed, or esthetic purposes.

In RLID, the "Hydric" value indicates the percentage of each map unit that meets the definition of hydric soils. Map units are composed of one or more map unit components or soil types, each of which is rated as hydric soil or not hydric. Map units that are made up dominantly of hydric soils may have small areas of minor non-hydric components in higher positions on the landscape, and map units that are made up dominantly of non-hydric soils may have small areas of minor hydric components in lower positions on the landscape. Each map unit is rated based on its respective components and the percentage of each component within the map unit.

OAR 660-033-0030(2) states: *"When a jurisdiction determines the predominant soil capability classification of a lot or parcel it need only look to the land within the lot or parcel being inventoried."*

ORS 215.710 lists the soils to be considered high value farmland: land in a tract composed predominantly of soils that are irrigated and classified prime, unique, Class I or Class II; or non-irrigated and classified prime, unique, Class I or Class II. In addition, for lands in the Willamette Valley, tracts composed predominantly of certain Class III or IV soils listed in ORS 215.710(3)(a)-(d) and soils west of the Cascades listed in (4)(a)-(d) are considered high value.

OAR 660-033-0030 (8)(a) "High-Value Farmland" means land in a tract composed predominantly of soils that are:

(A) Irrigated and classified prime, unique, Class I or II; or

(B) Not irrigated and classified prime, unique, Class I or II.

(c) In addition to that land described in subsection (a) of this section, high-value farmland, if in the Willamette Valley, includes tracts composed predominantly of the

following soils in Class III or IV or composed predominantly of a combination of the soils described in subsection (a) of this section and the following soils:

(A) Subclassification IIIe, specifically, Bellpine, Bornstedt, Burlington, Briedwell, Carlton, Cascade, Chehalem, Cornelius Variant, Cornelius and Kinton, Helvetia, Hillsboro, Hult, Jory, Kinton, Latourell, Laurelwood, Melbourne, Multnomah, Nekia, Powell, Price, Quatama, Salkum, Santiam, Saum, Sawtell, Silverton, Veneta, Willakenzie, Woodburn and Yamhill;

(D) Subclassification IVw, specifically, Awbrig, Bashaw, Courtney, Dayton, Natroy, Noti and Whiteson.

The UGB Preliminary Study Area contains fourth priority land tracts composed predominantly of soils that are identified in OAR 660-0233-0030(8)(a) as meeting the definition of comprising “High Value Farmland,” including soils and combinations of Subclassification IIIe and IVw soils.

In addition to prioritizing lands on the basis of capability classification as required by ORS 197.298, the City is required to apply Goal 14 Factors 3 and 4 to compare and evaluate candidate agricultural lands for inclusion in the UGB. In addition to requesting input from agency staff, the public and property owners to conduct the evaluation of alternatives, city staff conducted a literature search of relevant literature on this topic from the Oregon Department of Agriculture to supplement this report. The Department’s 2007 report “*Identification and Assessment of the Long-Term Commercial Viability of Metro Region Agricultural Lands*”, January 2007²³ states:

“Analysis of site and situation is best understood as an examination of both the capability (ability of the land to produce an agricultural product) and the suitability (ability to conduct viable farm use) of any given tract of land to be utilized for farm use. The key factors employed to identify significant and intact agricultural lands are discussed below.”

“Capability factors

The physical ability of land to produce an agricultural product is a key and dominant factor in any assessment. Quantity and quality of soils and water play a significant role in the viability of agricultural production.”

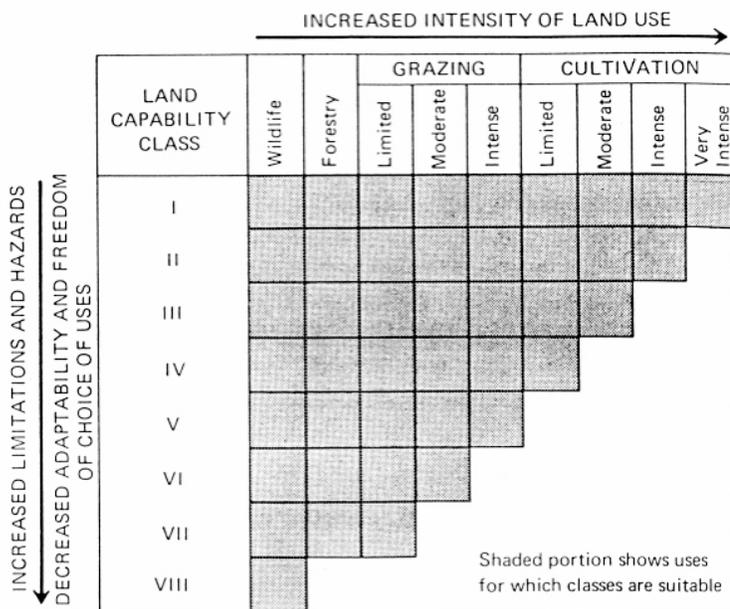
Soils: USDA NRCS agricultural capability class and importance (prime, unique, important farmlands). Because soils play a key role in the required Goal 14 analysis and Oregon land use issues, a more detailed discussion is provided below.

Soils surveys are based on all the characteristics of soils, including climate, that influence their use and management. Interpretations are provided within soil surveys for various land uses, including agriculture. Among these interpretations is the grouping of soils into

²³ Pages 13-14

agricultural capability classes. This classification system places soils in eight capability classes. The better the agricultural capability (decreasing from I-VIII), the less management (input) is required by the operator to produce a crop. Soil quality is also a key to the production options available to a grower.

The soils in the first four classes (I-IV), under typical/good management practices, are considered arable and are capable of producing adapted plants and common cultivated field crops and pasture plants. Some soils in classes V-VII are capable of producing specialized crops and even field and vegetable crops under special management.”



“Soils can also be designated as prime, unique, or high-value farmland:

Prime Farmland is land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber and oilseed crops. It must be available for these uses. It has the soil quality, growing season, and moisture supply needed to produce economically sustained high yields of crops when treated and managed according to acceptable farming methods, including water management. In general, prime farmlands have an adequate and dependable water supply from precipitation or irrigation, a favorable temperature and growing season, acceptable acidity or alkalinity, acceptable salt and sodium content, and few or no rocks. They are permeable to water and air. Prime farmlands are not exclusively erodible or saturated with water for a long period of time, and they either do not flood frequently or are protected from flooding.”

“Unique farmland is land other than prime farmland that is used for the production of specific high value food and fiber crops. It has the special combination of soil quality, location, growing season and moisture supply needed to produce economically sustained

high quality and/or high yields of a specific crop when treated and managed according to acceptable farming methods. Some examples of crops are tree nuts, cranberries, wine grapes, and tree fruits.”

“High Value Farmland is defined in ORS 215.710(1), (3) and (4) and OAR 660-033-0020(8)(a), (c), (d) and (e). “High Value Farmland” is land in a tract composed predominantly (50.1%) of certain specified soils commonly referred to as “High Value Farmland Soils.” These soils (alone or in combination) are the following:

1. Those soils classified by the Natural Resource Conservation Service (NRCS) as:

a. Prime, Unique, Capability Class 1 or Capability Class 2 not irrigated; or

b. Prime, Unique, Capability Class 1 or Capability Class 2 if irrigated; and

2. Certain specifically listed Capability Class 3 and 4 soils for the:

a. Willamette Valley; and

b. Oregon Coast west of the summit of the Coast Range if used in conjunction with a dairy operation on January 1, 1993; and

“High-value farmland also includes other lands planted in specified perennials based on the 1993 Farm Service Agency air photos.”

“Water: Availability of water for irrigation of agricultural crops and livestock watering. Water is key to the production of many high-value crops. However, many crops, including high-value crops, can be produced using dryland agricultural practices. Dryland production is most feasible where precipitation is adequate to allow economic return on a nonirrigated crop. New technologies in delivery and storage can compensate for limited availability.”

“Water availability is both an asset and a threat to regional agricultural. Current availability is overall good throughout the region. Expansion in some areas, especially where groundwater is the major source, is severely limited by ground water limitations. Such limitations do not impair the use of existing water rights. It is especially important to recognize existing agricultural irrigation in groundwater restricted areas because new irrigation rights currently are difficult to obtain.”

“Most of the suitability factors can be related to the position of farming operations as part of a large block of agricultural land or other resource lands. Protecting and maintaining large blocks of agricultural land is key to maintaining the integrity of working lands. Integrity involves many issues including the ability to operate with limited conflicts, curtail speculative land values and maintain a critical mass of land sufficient to leverage the infrastructure needs of the industry. (emphasis added)

- *Land use pattern: Adjacent and area land use pattern (nonfarm uses, exception areas). Includes analysis of edges that provide workable buffers between agricultural lands and nonfarm uses.*
- *Agricultural land use pattern within the subject agricultural area: The types of crops grown and the ability of farming operations/practices associated with the producing these crops to co-exist with other land uses in the area can be an important factor.*
- *Parcelization (number and size), tenure and ownership pattern: In analyzing suitability, parcelization is important, but not always as a stand-alone factor. All other factors being equal, smaller parcels under multiple ownerships are less favorable for long-term commercial farm use. The practice of renting or leasing smaller (and larger) parcels is very common in the region and needs to be taken into account. Long term, if the smaller parcels are protected for farm use, they frequently become available for rent, lease or acquisition for farm use, especially if they do not contain dwellings.*
- *Agriculture infrastructure: Elements such as transportation, irrigation delivery, labor availability, processing and other service needs, agricultural special districts, drainage facilities, etc., can be important factors in the long-term viability of an area. It is important to note that, unlike the infrastructure needs for new urban development, the agricultural infrastructure is in most cases already in place and has been and is being maintained and updated on an ongoing basis.*
- *Zoning, within subject agricultural area: Many lands currently employed in farm use within the Metro region are not zoned for exclusive farm use. The long-term suitability of such areas is impacted by the nonfarm uses that may be permitted and by the ability to further partition or subdivide the area.*
- *Location in relationship to adjacent lands zoned for nonresource development:*
- *The number, size and length of edges with urban and other nonfarm development impact the efficiency and effectiveness of agricultural practices and can impact land values.*
- *The scale, shape and size of protrusions of nonresource lands into agricultural lands also impact efficient and effective agricultural operations.*
- *Certain nonfarm uses are more compatible with agricultural operations than others.*
- *The ability to further partition or subdivide.*
- *Location/availability of edges and buffers that help insulate and protect agricultural operations from nearby nonfarm use.*

Other factors

- *Concentration/clusters of farms:*
- *The dependence between farms: ability for sharing of labor, housing, equipment and other needed services can be critical to the bottom line.*
- *The ability to leverage agriculture's infrastructure needs by maintaining economies of scale.*
- *A cluster of farms can also have marketing value. Customers like to make one trip to obtain berries, fruits, vegetables and other products in one area.*
- *Agri-tourism can also benefit from clusters. Examples include winery tours, marketing by the Tri County Farm Fresh Food Guide, and the Hood River Valley "Fruit Loop."*

"Trends in regional agriculture create different needs, opportunities and abilities for the industry. Consumer trends are increasingly dynamic and segmented, creating new markets; markets that are rapidly changing and demanding more specialty products. Specifically:

- *Global trade opportunities and concerns.*
- *Demand for organic, sustainable, high quality foods both in the home and at restaurants.*
- *Farmers markets, direct marketing opportunities, development of specialty and niche crops.*
- *"Agri-tourism*
- *Increasing demand for biofuels/energy development. Agricultural practices associated with the production of commodities used in the production of biofuels tend to be more extensive in nature, usually do not require irrigation and tend to require the use of larger machinery.*
- *Growing recognition of food security issues and demand for products from the local food shed.*
- *Federal Farm Bill. New conservation incentives and other programs related to renewable energy and farmland protection could help region farms cope.*

Location within and near a major metropolitan region can be a major asset in light of the trends outlined above. Many of the intensive, high-value, niche and specialty crops in increasing demand can be produced under circumstances not otherwise conducive to more recognized agricultural production in the region."²⁴

²⁴ *Identification and Assessment of the Long-Term Commercial Viability of Metro Region Agricultural Lands, Oregon Department of Agriculture, 2007*

The Department of Agriculture’s inventory and analysis for Portland Metro identified varying intensities, scale and suitability situations within the region’s agricultural lands. The study identified an agricultural lands hierarchy that recognized three levels of agricultural lands found in the Portland Metro region:

- **“Foundation Agricultural Lands:** *agricultural lands that provide the core support to the region’s agricultural base. These lands anchor the region’s larger agricultural base. They incubate and support the larger agricultural industry and are vital to its long-term viability. They have the attributes necessary to sustain current agricultural operations and to adapt to changing technologies and consumer demands.”*
- **“Important Agricultural Lands:** *agricultural lands that are suited to agricultural production and contribute to or have the capacity to contribute to the commercial agricultural economy. These lands maintain the ability to remain viable over the long term. They have the potential to be Foundation Agricultural Lands, but tend to be not utilized to their full potential. Trends in regional agricultural could lead to a greater development of the agricultural capacity of these areas.*
- **Conflicted Agricultural Lands** *are agricultural lands whose agricultural capability (soils/water) is more times than not considered excellent but whose suitability is questionable primarily due to questions of integrity and ability to operate. These questions lead to issues of long-term viability. These lands are influenced by factors that diminish long-term certainty, which in turn tends to limit investment in agricultural operations by area farmers. These lands could become Important Agricultural Lands with changes in circumstances and trends in the industry. There may be individual or multiple operations within these areas that are conducting efficient, effective and viable operations.”²⁵*

The City’s data base and methodology for identifying and evaluating soils for the purpose of ORS 197.298 and Goal 14 is reasonable and consistent with the law.

Evaluation results. The City’s initial wide-ranging look at soil classifications in 2008 provided a “big picture” of where prime agricultural soils and important agricultural lands are located in relationship with Springfield’s UGB and future growth needs. This assessment was confirmed through the City’s multi-year Citizen Involvement process and input from local agricultural experts and practitioners. This is important and germane to the City’s UGB study because Oregon law and the Oregon Department of Agriculture identify the importance of large blocks of agricultural land as an important factor in maintaining the states’s agricultural land base:

ORS 215.243 (2)

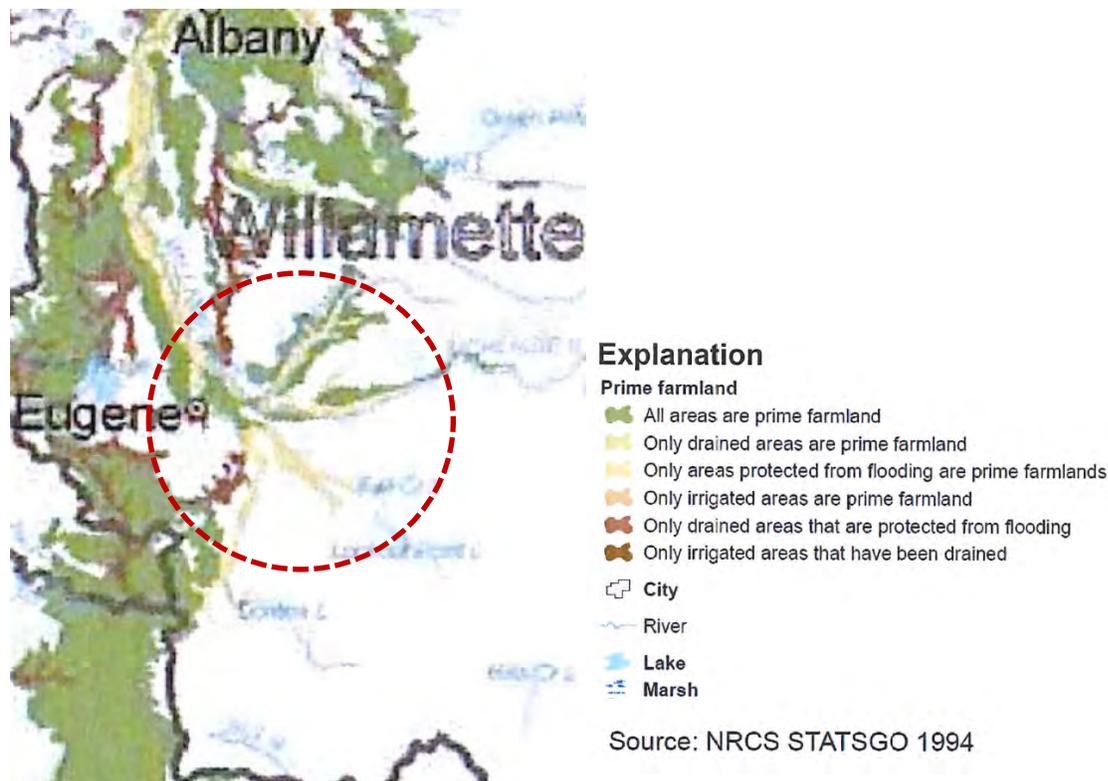
“The preservation of a maximum amount of the limited supply of agricultural land is necessary to the conservation of the state’s economic resources and the preservation of such land in large blocks is necessary in maintaining the agricultural economy of the state and for the assurance of adequate, healthful and nutritious food for the people of this state and nation. (emphasis added)

²⁵ Ibid

“Expansion of urban development into rural areas is a matter of public concern because of the unnecessary increases in costs of community services, conflicts between farm and urban activities and the loss of open space and natural beauty around urban centers occurring as the result of such expansion.”

The average size of a farm in Lane County (2012) is 83 acres.²⁶

An enlargement of the map “Prime Farmlands in Oregon” of the vicinity of the Springfield UGB Vicinity²⁷ illustrates the general location of large blocks of prime farmland in relationship to the Springfield/Eugene metro area:



²⁶ USDA Census of Agriculture 2012, County Profile, Lane County, Oregon, http://www.agcensus.usda.gov/Publications/2012/Online_Resources/County_Profiles/Oregon/cp41039.pdf accessed 12-16-15.

²⁷ *Integrated Water Resources Strategy, Map Gallery*, Oregon Water Resources Dept., 2010, p. 6.

Insert 11 x 17 page: Map 4: Study Area Soil Class, ECONorthwest, December 2008

As clearly shown in Map 2: Alternatives Analysis Soils and Constraints (derived from NRCS SSURGO data)—in which the darkest brown colors on the map indicate locations of Class I (soils with few limitations that restrict their use) and Class II (soils with moderate limitations that reduce the choice of plants or that require moderate conservation practices)— the largest blocks of predominantly Class I and II soils outside of the Springfield UGB are located:

- south of the Willamette River, south of the Springfield UGB and east of Interstate Highway 5 (Seavey Loop area);
- southeast of the UGB, between the Willamette River and Pudding Creek, north of Highway 58 (Jasper Bridge area), and extending farther south to the Pleasant Hill area.

The City identified two prime farmland areas consisting of the largest blocks of predominantly Class I and II soils outside of the Springfield UGB when it prioritized and evaluated lands based on capability classification, and when it considered and compared potential UGB expansion areas that would avoid or reduce impacts to those two prime farmland areas.

It should be noted here that both of these prime farm soil areas are located in the immediate vicinity of second priority exception areas, thus the City was required under ORS 197.298 to consider second priority Seavey Loop and Jasper Bridge areas as candidate lands for urbanization regardless of this fact. The City's analysis provided explanation of why the Seavey Loop/College View study area and Jasper Bridge exception parcels were eliminated from consideration for employment land due to lack of suitable parcel sizes and physical constraints that preclude the ability to provide public facilities and services within the planning period. It should also be noted that the City received large volumes of comments from the public expressing concerns about and preferences for the importance of maintaining the Seavey Loop agricultural area for agriculture.

Other Class I and II soil areas, both in the vicinity of the UGB, and several miles out from the UGB are in smaller blocks or are more mixed.

- Generally, the northern edge of the existing Springfield UGB follows the McKenzie River and its flood plain. Lands outside of and adjacent to the UGB and on the Springfield side of the McKenzie River are predominantly Class II soils, interspersed with Class VII channels and smaller amounts of Class IV soils.
- Generally, the southern portion of the existing Springfield UGB between the UGB and the Willamette River comprises lands consisting primarily of Class II soils, interspersed with Class VII channels and smaller amounts of Class IV soils.
- Generally, the southeast portion of the existing Springfield UGB follows the ridgeline of the Thurston South Hills ("South Hills" Study Area grouping). The Thurston South Hills lands outside of and adjacent to the UGB are predominantly a mix of Class VI, IV, and VII soils.
- Generally, lands located farther south of the UGB, south of the Willamette River and its side channels comprise the largest blocks of Class I and II soils.

To conduct the soils analysis, the City identified general geographic groupings of all land areas in the vicinity of the UGB and named the areas for ease of reference, mapping and communication purposes. The City did not arbitrarily delineate UGB study areas for the purpose of conducting a quantitative analysis. Instead, the City reviewed NRCS Lane County Soil Survey soils series maps, sorted soil series into Classes I through VIII and conducted a visual qualitative assessment to determine the presence and general location of high value agricultural soils in the vicinity of the Springfield UGB.

For the purpose of prioritizing agriculture or forest land by capability classification, the City conducted a general visual assessment of mapped capability class to begin to sort lands in the order of highest capability classification as shown in Map 4: Study Area Soil Class, City of Springfield, OR, ECONorthwest, December 2008. This assessment includes all land, including the second and third priority lands previously discussed. It addresses mapped capability classification only and does not apply or address interplay of constraints such as slopes, rivers, floodway, existing development, etc.²⁸

The soils in the vicinity of the Springfield UGB are located generally as follows:

Class I Soils

Within the preliminary Springfield UGB Study area adjacent to the UGB, Class I soils are found in the following areas:

- McKenzie View
- Mohawk
- Oxbow/Camp Creek
- Hayden Bridge
- Far East Springfield
- North Springfield Highway
- Thurston
- Jasper Bridge
- Seavey Loop²⁹

As shown in Map 4, the largest contiguous areas of Class I soil within the preliminary Springfield UGB Study area are Jasper Bridge and Mohawk.

The City's UGB employment land expansion does not include areas comprised of Class I soils.

Class II Soils

Within the preliminary Springfield UGB Study area, Class II soils are found in the following areas:

²⁸ The City prepared a map Soil Capability and Constraints, depicting soil capability classes and absolute development constraints, March 2016.

²⁹ In a meeting with staff Pauly, Ross Penhallegon OSU extension service, stated that the best farmland in the City's study area is "right along Seavey Loop", and described this area as "very prime farm land" and "#1 place for close-in agriculture." See also email from R. Penhallegon to L. Pauly dated Feb. 27, 2015.e

- North Gateway
- McKenzie View
- Hayden Bridge
- Mohawk
- Oxbow/Camp Creek
- North Springfield Highway
- Thurston
- Far East Springfield
- South Hills
- Wallace Creek
- Jasper Bridge
- West Jasper/Mahogany
- Clearwater
- Mill Race
- Seavey Loop
- Far East Springfield
- Jasper Bridge
- Mahogany
- Clearwater
- Oxbow/Camp Creek

Each Preliminary study area grouping comprises at least some Class II soils. The largest contiguous areas of Class II soil within the preliminary Springfield UGB Study area are Jasper Bridge, Seavey Loop and Oxbow/Camp Creek. The study area with the smallest size mapped Class II areas are South Hills and Wallace Creek.

The City's UGB employment land expansion includes Class II soils in the North Gateway and Mill Race areas.

Class III Soils

Within the preliminary Springfield UGB Study area, Class III soils are found in the following areas:

- McKenzie View
- Mohawk
- Hayden Bridge
- Oxbow/Camp Creek
- North Springfield Highway
- Far East Springfield
- South Hills
- Wallace Creek

- Jasper Bridge
- Mill Race
- Seavey Loop

Each Preliminary study area grouping except North Gateway, Thurston, West Jasper/Mahogany and Clearwater comprise at least some Class III soils. The largest contiguous areas of Class III soils are in Oxbow/Camp Creek.

The UGB Preliminary Study Area contains soils that are identified in OAR 660-0233-0030(8)(a) as meeting the definition of comprising “High Value Farmland,” including soils and combinations of Subclassification IIIe and IVw soils. *Subclassification IIIe, specifically, Bellpine, Bornstedt, Burlington, Briedwell, Carlton, Cascade, Chehalem, Cornelius Variant, Cornelius and Kinton, Helvetia, Hillsboro, Hult, Jory, Kinton, Latourell, Laurelwood, Melbourne, Multnomah, Nekia, Powell, Price, Quatama, Salkum, Santiam, Saum, Sawtell, Silverton, Veneta, Willakenzie, Woodburn and Yamhill;*

(D) Subclassification IVw, specifically, Awbrig, Bashaw, Courtney, Dayton, Natroy, Noti and Whiteson.

Underlined soils are present in UGB Preliminary Study Area.

The City’s UGB employment land expansion includes Class III soils in the Mill Race area.

Class IV Soils

Within the preliminary Springfield UGB Study area adjacent to the UGB, Class IV soils are found in the following areas:

- North Gateway
- McKenzie View
- Mohawk
- Oxbow/Camp Creek
- North Springfield Highway
- Thurston
- Far East Springfield
- South Hills
- Wallace Creek
- Jasper Bridge
- Jasper Bridge
- West Jasper/Mahogany
- Clearwater
- Mill Race
- Seavey Loop

Each Preliminary study area grouping comprises at least some Class IV soils. The largest contiguous areas of Class IV soil in the vicinity of Springfield's UGB are South Hills (Forest land) and Mohawk (agricultural land). Class IV soil are also located between the McKenzie Highway and South Hills in the Far East Springfield area.

The UGB Preliminary Study Area contains soils that are identified in OAR 660-0233-0030(8)(a) as meeting the definition of comprising "High Value Farmland," including soils and combinations of Subclassification IIIe and IVw soils. *Subclassification IIIe, specifically, Bellpine, Bornstedt, Burlington, Briedwell, Carlton, Cascade, Chehalem, Cornelius Variant, Cornelius and Kinton, Helvetia, Hillsboro, Hult, Jory, Kinton, Latourell, Laurelwood, Melbourne, Multnomah, Nekia, Powell, Price, Quatama, Salkum, Santiam, Saum, Sawtell, Silverton, Veneta, Willakenzie, Woodburn and Yamhill;*

(D) Subclassification IVw, specifically, Awbrig, Bashaw, Courtney, Dayton, Natroy, Noti and Whiteson.

The City's UGB employment land expansion includes Class IV soils in the North Gateway and Mill Race areas.

Class V Soils

No Class V soils are found within the Springfield UGB study area adjacent to the UGB.

Class VI Soils

Within the preliminary Springfield UGB Study area adjacent to the UGB, Class VI soils are found in the following areas:

- McKenzie View
- Mohawk
- Oxbow/Camp Creek
- Far East
- South Hills
- Wallace Creek
- Seavey Loop

The largest contiguous areas of Class IV soil in the vicinity of Springfield's UGB are McKenzie View, Mohawk, Camp Creek and South Hills

Class VI soils in the McKenzie View/Coburg Hills area are steep slopes with numerous landslide areas mapped in DOGAMI SLIDO.

Class VI soils in the Mohawk Valley area (east side of valley) include numerous areas are mapped in DOGAMI SLIDO as landslide talus/colluvium, and fans.

The City's UGB employment land expansion does not include Class VI soils.

Class VII Soils

Within the preliminary Springfield UGB Study area adjacent to the UGB, Class VII soils are found in the following areas:

- North Gateway
- McKenzie View
- Oxbow/Camp Creek
- North Springfield Highway
- Thurston
- Far East
- South Hills
- Wallace Creek
- West Jasper/Mahogany
- Clearwater
- Seavey Loop

The City's UGB expansion includes Class VII soils.

Class VIII Soils

Within the preliminary Springfield UGB Study area adjacent to the UGB, Class VIII soils are found in the following areas:

- North Gateway
- McKenzie View
- Oxbow/Camp Creek
- North Springfield Highway
- Far East
- South Hills
- West Jasper/Mahogany
- Clearwater
- Mill Race
- Seavey Loop

This classification includes W Water, 114 Riverwash, 110 Pits, 127C Urban land-Hazelair-Dixonville

The City's UGB expansion includes Class VIII soils in the North Gateway (Natural Resource designation) and Mill Race (Public/Semi-Public designation) areas.

UGB Study Area Soils Summary:

In the vicinity of the Springfield UGB, the City concluded that largest contiguous areas of Class I and II high value farmland soils are located:³⁰

- Farmland east of Mt. Pisgah and west of Jasper Road
- Seavey Loop area east of Mt. Pisgah and along Highway 58

Generally speaking, in the Springfield area Class VIII, VII and VI soils are located in the hills and along the McKenzie and Willamette river channels, sloughs and floodways and generally are not suitable for developing urban industrial and office employment centers. No Class V soils are present in the area.

The City’s analysis evaluated agriculture and forest-designated land with Class VIII, VII, VI, (no class V), IV, III, II and I capability classifications to identify potential candidate expansion areas.

The City’s analysis properly assigned higher priority to land of lower capability as measured by the NRCS capability classification system when it evaluated and selected potential candidate UGB expansion areas, consistent with ORS 197.298 (1) and (2).³¹

Table 15: Evaluation of Potentially Suitable Fourth Priority Land

Map and Tax Lot	Capability Class %	Soil Map Units/Slopes	Suitable employment site for inclusion in UGB?
North Gateway Site (Note Class II land north of Sprague was excluded)			
1703154000 400 (102 ac.)* High value farmland comprises 45% of tract	45% CI II 35% CI VII 15% CI IV 6% CI VIII Hydric soils	95 Newberg 48 Fluvents 22 Camas 114 Riverwash Flat topo	YES Proximity Topo Public Facilities ESEE
170310000 2500 (68.3 ac.)* High value farmland comprises 44% of tract	46% CI II 34% CI IV 16% CI VII 4% CI VIII Hydric soils	96 Newberg 22 Camas 48 Fluvents 114 Riverwash Flat topo	YES Proximity Topo Public Facilities ESEE
170310000 2400 (22.8 ac.)* High value farmland comprises 89% of portion of tract east of I-5 (area west of I-5 is excluded from this study)	89% CI II 4% CI VII 7% CI VIII Hydric soils	Flat site 96 Newberg 22 Camas, 114 Riverwash	YES Proximity Topo Public Facilities ESEE
McKenzie View Site (Note Class I and II land was excluded)			
17021800 402 17021800 403 17021800 404	VI	108C- Philomath 3-12% slopes	NO Public Facilities Slopes Proximity Landslide hazard ESEE

³⁰ Map 4: Study Area Soil Class, City of Springfield, OR, ECONorthwest, December 2008

³¹ The City’s record includes descriptions of the applicable soil series from the NRCS Soil Survey of Lane County.

Oxbow/Camp Creek (Note Class I and II land was excluded)			
17022200 200 17022200 103 17022300 300 approx. 6.8 acres are Class III, slopes 15% or less	III	105A – Pengra 1-4% slopes, 113E 102C 108C – Philomath	NO Public Facilities Proximity Landslide hazard BPA easement ESEE
17022300 700, 703, 704	III (high value farmland)	11C Bellpine 3-12% (high value farmland)	NO Soil Capability Slopes Proximity Public Facilities ESEE
Far East (South) (Note Class I and II lands and lands north of Hwy 126 were excluded)			
1702364000 200 1702364000 100 1701310000 603 1701310000 600 1701310000 500 43E	III	52D Hazelaire 7-20% slopes 43E Dixonville-Philomath- Hazelaire Complex, 12-35% slopes	NO Slopes Landslide hazard ESEE
West Jasper/Mahogany (Note Class II land was excluded)			
18020900 301 (8.4 acres)* 18020900 200 (62.4 acres)*	64% CI VII, 17% CI III, 10% CI VIII water, 9% CI II 53% CI VII and VIII, 44% CI II	95 Newberg 48 Fluvents 52B Hazelaire 2-7 % slopes hydric soils	NO Proximity Public Facilities ESEE
18020400 3000 (54.5 acres)*	75% CI VII, 25% CI II	48 Fluvents 95 Newberg 73 Linslaw 121B Salkum, 2-8% slopes hydric soils	NO Proximity Public Facilities ESEE
1802090000 203 (22.7 acres)*	86% water and fluvents CI VIII, VII, 2% CI II	48 Fluvents 52B Hazelaire 2-7 % slopes 73 Linslaw 95 Newberg hydric soils	NO Proximity Public Facilities ESEE
18020400 2401 (6.1 acres)*	54% non farm, 46% CI VII, II, IV	95 Newberg 48 Fluvent 52B Hazelaire 2-7 % hydric soils	NO Proximity Public Facilities ESEE
Clearwater			
18020500 2800 (39.5 ac.)*	63% CI II 23% CI VII 14% CI IV	95 & 96 Newberg 48 Fluvents 22 Camas	NO Capability Classification Proximity Public Facilities

			ESEE
18020500 2600 (22 ac.)*	72% CI II 14% CI IV 14% CI VII	95 & 96 Newberg 22 Camas 48 Fluvents	NO Capability Classification Proximity Public Facilities ESEE
18020800 100 (16.2 ac.)*	46% CI II 40% CI VIII 14% CI VII	95 Newberg 110 Pits 48 Fluvents	NO Proximity Public Facilities ESEE
18020500 1928 (10 ac.)*	34% CI IV 33% CI VII 33% CI II	22 Camas 48 Fluvents 95 Newberg	NO Proximity Public Facilities ESEE
18020500 2801 (29 ac.)*	56% CI VII 3% CI VI 36% CI II	48 Fluvents 113E Rittner 12-30% slopes 96 Newberg, Salkum 2-8% slopes	NO Proximity Public Facilities ESEE
Wallace Creek			
1802140000 900 (17 ac.)*	51% CI VI	102C Panther 2-12% slopes 11D Bellpine 12-20% slopes 52B Hazelair 2-7% slopes hydric soils	NO Slopes Proximity Public Facilities ESEE
18021400 800 (8.3 ac.)*	66% CI III 28% CI VI 6% CI II	52B Hazelair 2-7 % slopes 102C Panther 2-12% slopes 78 McAlpin hydric soils	NO Slopes Proximity Public Facilities ESEE
1802140000 903 (7 ac.)* 1802140000 902 (4.8 ac.)*	89% CI III 11% 94% CI III	130 Waldo 102C Panther 2-12% slopes hydric soils	NO Slopes Proximity Public Facilities ESEE
1802140000 500 (20.8 ac.)*	46% CI III 28% CI VI 14% CI IV 11% CI II 1% CI VI	130 Waldo 108C Philomath, 3-12% 52D Hazelair, 14% 78 McAlpin 102C Panther 2-12% slopes hydric soils	NO Slopes Proximity Public Facilities ESEE
1802140000 1303 (19 ac.)*	77% CI VI 22% CI III	108C Philomath, 3-12% 130 Waldo/Hazelair/Dupee hydric soils	NO Proximity Public Facilities ESEE
Mill Race			
SUB Tract 18030100 3700 (SUB)(36.7 ac.)*	95% CI II 3 % CI III HV	26 Chehalis, 29 Cloquato, 95& 96 Newberg, 79 McBee (Prime)	YES Proximity Topo Public Facilities ESEE
18030100 502 (SUB) (20.5 ac.)*	85% CI II 13% CI III	96 Newberg, 79 McBee (Prime), 29 Cloquato, 26	YES Proximity Topo Public Facilities ESEE

	1% CI VIII water	Chehalis, W water	YES Proximity Topo Public Facilities ESEE
18030100 501 (22.1 ac.)*	99% CI II 1% Water	96 Newberg	YES Proximity Topo Public Facilities ESEE
18030100 1400 (9.9 ac.)*	100% High value ag: 63% CI II, 36% CI III McBee (HV)	29 Cloquato 79 McBee 96 Newberg	YES Proximity Topo Public Facilities ESEE
18030100 1300 (8.32 ac.)*	100% High value ag: 44% CI II, 56% CI III McBee (HV)	29 Cloquato 79 McBee 96 Newberg 26 Chehalis	
18030100 1199 (3.4 ac.)*	100% High value ag: 82% CI II, 17% CI III McBee (HV)	26 Chehalis 95 Newberg 79 McBee	
18030100 1700 (10 ac.)*	56% CI II 44% CI III	95 & 96 Newberg, 29 Cloquato, 22 Camas	YES Proximity Topo Public Facilities ESEE
18030100 1701(5 ac.)*	100% CI II	96 Newberg, 29 Cloquato	YES Proximity Topo Public Facilities ESEE
18030100 1702(5.3 ac.)*	77% CI II 34% CI IV	95 & 96 Newberg, 29 Cloquato 22 Camas	
Seavey Loop			
18031410 300 (36 ac.)*	62% High Value Ag: 42% CI II 9% CI III Prime 28% CI III 11% CI IV High Value 11% CI VI	78 McAlpin, 26 Chehalis 79 McBee ³² 130 Waldo 85 Natroy ³³ 43C Dixonville-Philomath- Hazelair complex	NO Soil Capability Public Facilities Proximity ESEE
18031410 1305 (15.6 ac.)*	74% High Value Ag: 72% CI IV High Value 1% CI III 1% CI II 24% CI VI	85 Natroy 79 McBee 78 McAlpin 43C Dixonville-Philomath- Hazelair complex	
18021410 1400 (5 ac.)*	100% High Value Ag:	85 Natroy	

³² McBee is listed in the NRCS Soil Survey of Lane County as prime farmland soil.

³³ Natroy in the Willamette Valley is identified as high value farmland in ORS 215.710

<p>18031100 1600 (3.8 ac.)*</p>	<p>100% CI IV High Value</p> <p>100% High Value Ag: 71% CI II 30% CI II High Value</p>	<p>26 Chehalis 79 McBee</p>	
<p>18031130 3900 (3.1 ac)*</p>	<p>61% High Value Ag: 61% CI III Prime 38% CI IV</p>	<p>79 McBee 43C Dixonville-Philomath-Hazelair complex</p> <p>Hydric soils</p>	
<p>18031410 306 (20 ac.)*</p>	<p>77% High Value Ag: 40% CI II 14% CI III Prime 23% CI IV High Value 15% CI IV</p> <p>9% CI VI</p>	<p>118 Salem, 26 Chehalis 79 McBee 85 Natroy 43C Dixonville-Philomath-Hazelair complex 12-35% slopes 43C Dixonville-Philomath-Hazelair complex 3-12% slopes 102 C Panther</p>	<p>NO Soil Capability Public Facilities Proximity ESEE</p>

* absolute development constraints are not deducted from parcel acreage in this table

EXCLUDE HIGHER PRIORITY FOURTH PRIORITY AGRICULTURAL LANDS ON THE BASIS OF CAPABILITY CLASSIFICATION

In the next step in the process, the City excluded fourth priority lands on the basis of the capability classification system or by cubic foot site class of lands adjacent to the UGB.

Class I capability lands excluded.

The City excluded all the lands within the preliminary Springfield UGB Study area with Class I capability from further consideration:

- McKenzie View
- Mohawk
- Oxbow/Camp Creek
- Hayden Bridge
- Thurston
- Far East Springfield
- North Springfield Highway
- Jasper Bridge

- Seavey Loop³⁴

The City excluded the largest contiguous areas of Class I soil within the preliminary Springfield UGB Study area: Jasper Bridge and Mohawk.

The City's UGB employment land expansion does not include areas comprised of Class I soils.

Class II capability lands excluded.

Most of the preliminary study area groupings comprise at least some Class II soils. With the exception of the South Hills and Wallace Creek, the preliminary study areas adjacent to the UGB comprise Class II soils. To provide unconstrained, suitably sloped, and serviceable land for industrial and commercial mixed use office employment in an efficient growth pattern in accord with all applicable statutes, administrative rules and comprehensive plan policies, the City determined it would need to include some Class II soils in the UGB expansion. Thus the City could not exclude all lands with Class II soils at this point in the analysis. Thus the City sought to limit and lessen the impacts of such an expansion on farmland by avoiding the largest areas of Class II soils and other High Value Farmland as defined in ORS 215.710 and OAR 660-033-0030(8)(a) when it selected candidate fourth priority parcels for expansion. By expanding on land with more mixed soils, the City's expansion has less overall impact on large blocks of prime soils and prime farmland in the vicinity of the UGB and less overall impact on the viability of larger agricultural areas in the vicinity of the UGB.³⁵ The City's reasoning to fully meet the intent of ORS 197.298 and the Goal 14 Factors 1-4 is consistent with the law.

The City's analysis identified and compared the proportion of Class II and other High Value and Prime Farmland soils on potentially suitable candidate parcels when the City determined which parcels comprise predominantly High Value soils; when the City relied on that data to determine prioritization of fourth priority lands under ORS 197.298; and when the City applied Goal 14 Factors 1-4 to candidate fourth priority lands.

The largest contiguous areas of Class II soil within the preliminary Springfield UGB Study area are Jasper Bridge, Seavey Loop and Oxbow/Camp Creek areas. The City determined that those study areas have lower priority for inclusion if found to be suitable to meet the identified land need.

The North Gateway site north of Sprague Road comprises predominantly Class II soils. The City excluded that area from consideration:

³⁴ In a meeting with staff Pauly on 1-13-13, Ross Penhallegon OSU extension service, stated that the best farmland in the City's study area is "right along Seavey Loop", and described this area as "very prime farm land" and "#1 place for close-in agriculture." See also email from R. Penhallegon to L. Pauly dated Feb. 27, 2015.

³⁵ For example, *Agronomic Suitability Analysis of Wicklund Trust Property*, Northwest Consulting, Jan. 27, 2009, pp. 2-4 describes the perceived effect of adjacent urbanization on the economic viability of farm operations and the unknown effect on adjacent farmland if subject property were to be removed from production. See also attached corroborating letter from Chad Egge, farmer of subject property 2005-2009.



Class II area excluded

The City excluded all Class II areas in McKenzie View. These Class II sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City excluded all Class II areas in Oxbow/Camp Creek. These Class II sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City excluded all Class II areas in Far East and all adjacent agricultural lands north of Highway 126. These Class II sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City excluded all Class II areas in West Jasper/Mahogany. These Class II sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City excluded all Class II areas in Clearwater. These Class II sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City excluded all Class II areas in Wallace Creek. These Class II sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City excluded all Class II areas in Seavey Loop. These Class II sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City's UGB expansion includes lands predominantly Class II in Mill Race. The City identified suitable parcels comprising Class II soils in Table 15.

The City's UGB expansion includes Class II soils within mixed soil areas in North Gateway. The City identified suitable parcels comprising Class II soils in Table 15.

Class III capability lands excluded.

Each Preliminary study area grouping except North Gateway, Thurston, West Jasper/Mahogany and Clearwater comprises at least some Class III soils. Some Class III soils are considered High Value and Prime Farmland within the Willamette Valley.

The largest contiguous areas of Class III soils are in Oxbow/Camp Creek. The City excluded Class III (Bellpine) High Value Farmland areas in Oxbow/Camp Creek. Class III sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City excluded Class III (McBee) Prime Farmland areas in Seavey Loop that are mixed with Class II High Value and Class IV Prime Farmland soils. These Class III sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City's UGB expansion includes Class III soils in Mill Race that are mixed with Class II and Class IV.

Class IV capability lands excluded.

The City excluded Class IV (Natroy) High Value Farmland areas in Seavey Loop that are mixed with Class II and Class III High Value Farmland soils. These Class IV sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

Class VI soils excluded.

The City's UGB expansion does not include Class VI soils. The City evaluated the potentially suitable lands comprising Class VI soils and ultimately rejected those sites from consideration. These Class VI sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

Class VII soils are higher priority for expansion.

The City's UGB expansion includes Class VII soils in North Gateway and Mill Race.

The City evaluated the potentially suitable lands comprising Class VII soils and ultimately rejected those sites from consideration. These Class VII sites were also excluded on the basis of physical public facilities constraints, proximity and Goal 14 factors 3 and 4.

Class VIII soils are higher priority for expansion.

The City's UGB expansion includes Class VIII soils in North Gateway and Mill Race.

The City evaluated the potentially suitable lands comprising Class VIII soils and ultimately rejected those sites from consideration. It should be noted that the Class VIII capability classification in Lane County includes Water. These Class VIII sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

Table 16: Fourth Priority Agriculture and Forest Land Excluded on the Basis of Predominant Capability Classification				
North Gateway (North of Sprague) Class II	McKenzie Class I and II	View	Oxbow/Camp Class I, II and III High Value	Creek
Hayden Bridge	Mohawk		North Springfield Highway	
Far East (North of Hwy 126)	South Hills Class III High Value		West Jasper/Mahogany Class II	
Wallace Creek	Jasper	Bridge		
Seavey Loop Area 1	Thurston		Clearwater	

Areas designated Agriculture are shown in beige color. Areas designated Forest are shown in green color. Areas with both designations are shown with both colors.

EXCLUDE FOURTH PRIORITY LANDS LACKING THE SPECIFIED CHARACTERISTICS TO MEET THE IDENTIFIED EMPLOYMENT LAND NEED

OAR 660-024-0060(1)(d):

“Notwithstanding subsection (a) to (c) of this section, a local government may consider land of lower priority as specified in ORS 197.298(3).”

ORS 197.298(3)

“Land of lower priority under subsection (1) of this section may be included in an urban growth boundary if land of higher priority is found to be inadequate to accommodate the amount of land estimated in subsection (1) of this section for one or more of the following reasons:

(a) Specific types of identified land needs cannot be reasonably accommodated on higher priority lands; (emphasis added)

(b) Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; (emphasis added)

or

(c) Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.”

As explained above, the City excluded fourth priority lands on the basis of 1) soil capability classification; and 2) specific types of land needs. As previously explained above and in the CIBL/EOA, the City screened each study area grouping to identify lands with slopes 15% or less and comprising at least 5

acres without absolute development constraints that make lands unbuildable for industrial or commercial employment uses. In this step, the City's methodology excluded lands of higher priority capability classification because those lands are encumbered by absolute development constraints to the extent that the City's specific types of identified cannot be reasonably accommodated [ORS 197.298 (3)(a)]. This report and the local record provide adequate evidence of the thorough and painstaking process conducted by City staff to screen candidate lands adjacent to the UGB to evaluate alternative locations. The City's methodology and reasoning for excluding lands of lower priority capability classification is appropriate and consistent with the law.

Exclude higher priority lands where specific types of identified land needs cannot be reasonably accommodated [ORS 197.298(3)(a)] and/or where future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints [ORS 197.298(3)(b)]

In the next step, the City excluded the fourth priority lands that are *not* potentially suitable to provide sites with the needed site characteristics to satisfy the identified employment land need deficiency.

OAR 660-024-0060 (1)(e) states:

"For purposes of this rule, the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under section (5) of this rule, as well as other provisions of law applicable in determining whether land is buildable or suitable."[emphasis added]

OAR660-024-0060(5)

"If a local government has specified characteristics such as parcel size, topography, or proximity that are necessary for land to be suitable for an identified need, the local government may limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298."
[emphasis added]

Identification of Potentially Suitable and Serviceable Land

At this stage in the analysis, the city had identified lands of suitable parcel sizes (at least 5 acres of unconstrained land - free of absolute development constraints. These candidate sites were then evaluated to determine whether topographic or other physical constraints preclude reasonable service provision and consideration of site location and other physical characteristics of needed sites to accommodate target industry employment types identified in the CIBL/EOA. The City's Public Services Analysis compared relative physical distance to the public facilities and services needed to serve

industrial and office commercial employment land uses, including the target industries identified in the CIBL/EOA.

As previously explained in the City's findings under Goal 9, the CIBL/EOA³⁶ provides a determination of the amount and type of land needed in the UGB amendment to accommodate Springfield's employment land needs for 2010-2030, and OAR 660-009-0005 states that "the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under Section (5), as well as other provisions of law applicable in determining whether land is buildable or suitable."

To identify *potentially* suitable land to meet employment land needs, the City applied the following factors³⁷ (from an outline provided by DLCD Staff Gordon Howard) to exclude or include fourth priority lands in the next stage of the evaluation process:

- Exclude lands that are not buildable³⁸
- Exclude lands based upon specific land needs (197.298(3)(a))

The next step in the process screened candidate lands to identify and compare lands having the site characteristics necessary for the operation of the target industrial and other employment industries identified in the CIBL/EOA. Springfield's EOA identifies a need for sites larger than 20 acres. As previously explained in this report, higher priority exception areas and marginal lands sites in the vicinity of the UGB will not provide suitable employment sites for the 2010-2030 planning period. Exception areas and marginal lands are inadequate to accommodate the type of employment land needed, thus the City's analysis considered land designated in the acknowledged Lane Rural Comprehensive Plan for agriculture or forestry or both.

Background regarding City's process to identify candidate lands based upon specific land needs. The following information is provided to explain how the City's alternatives analysis integrated public input received through a multi-year iterative planning process, and to explain maps and other materials dated 2008-2010 that are in the City's local record and/or have been integrated into this report.

Early in the City's land assessment process (2008-2009), the CIBL Technical and Stakeholder committees identified an initial set of lands they deemed worthy of further analysis to determine their suitability for urbanization. This input was based on early GIS screening of land surrounding the UGB by consultant ECONorthwest to locate priority lands under ORS 197.298, large parcel sizes, and land free of absolute development constraints. At that time and based on Springfield's preliminary draft analysis of residential and employment land needs, it was anticipated that UGB expansion would be required to meet both

³⁶ CIBL/EOA Table S-5, page x.

³⁸ "Buildable" is a Goal 10 term. It is the City's position that OAR 660-024-0060 (1) requires the City to consider whether sites are "suitable" at this "buildable" stage in the evaluation process.

employment *and* residential land needs. The record provides documentation of the 2008-2009 analysis process, including maps that assumed expansion for residential purposes in addition to employment purposes.^{39 40} For example, as shown in the following map dated 2008, nine areas were initially considered for further analysis and discussion through the City's the public involvement process 2008-2010. Other areas or specific parcels were proposed throughout the public involvement process and public hearing conducted by the Springfield and Lane County Planning Commissions in Feb-May 2010.



Initial study area identification: 2008-2009 CIBL/EOA public involvement process

The UGB study area established by the City includes land that was previously identified in the initial 2008-2009 Commercial and Industrial Lands Study planning process (CIBL Technical Advisory Committee and Stakeholder Advisory Committee, public workshops, open houses and public hearings) as having a reasonable potential to satisfy the residential and employment land need deficiencies that had been estimated at that time. The City's initial 2008-2009 Commercial and Industrial Lands Study planning process identified areas for evaluation and consideration based on an expected need for a larger UGB expansion to meet *both* residential and employment land needs. The City's final land need is for fewer acres of employment land — 223 acres — compared with the 640-acre deficit identified in the 2009 Draft CIBL/EOA. The City went on to meet its residential land deficit without expanding the UGB.

The City's final UGB expansion proposal also includes existing Willamalane parks and SUB public facilities to address concerns raised by the public, planning commissioners and elected officials during the 2008-2010 public involvement process.

EXCLUDE LANDS THAT ARE NOT BUILDABLE (SUITABLE) BASED UPON SPECIFIC LAND NEEDS [ORS 197.298(3)(a)]

³⁹ It is important to note that 2008-2009 analysis maps in the local record also relied upon older data sets that were later found to be incomplete or incorrect. For example, the floodway data for the Seavey Loop area was found to be inaccurate and was updated subsequently. This had the effect of substantially reducing the amount of unconstrained acreage from the area shown in the earlier 2008-2009 maps.

⁴⁰ The Metro Plan boundary was amended subsequent to the creation of the 2008-2009 maps.

This section of the report provides explanation and evidence to support the City's findings addressing ORS 197.298(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060(1)(c), OAR 660-024-0060(1)(d), OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR 660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c).

OAR 660-024-0060(1)(e)

"For purposes of this rule, the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under section (5) of this rule, as well as other provisions of law applicable in determining whether land is buildable or suitable."

OAR 660-024-0060 (5)

"If a local government has specified characteristics such as parcel size, topography, or proximity that are necessary for land to be suitable for an identified need, the local government may limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298."

The Goal 9 rule clearly allows and requires the City to identify the typical attributes of employment land sites necessary to accommodate the industries and employers that will support the City's economic development objectives, based on the Economic Opportunities Analysis. The Goal 9 rule clearly allows and requires the City to designate suitable, serviceable sites, types and locations for employment uses — through its comprehensive plan and through appropriate implementing measures including amendments to plan and zone map designations, land use regulations, public facility plans, and transportation system plans.

"Site Characteristics" means the attributes of a site necessary for a particular industrial or other employment use to operate. Site characteristics include, but are not limited to, a minimum acreage or site configuration including shape and topography, visibility, specific types or levels of public facilities, services or energy infrastructure, or proximity to a particular transportation or freight facility such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes. [OAR 660-009-0005(11)]

"Suitable" means serviceable land designated for industrial or other employment use that provides, or can be expected to provide the appropriate site characteristics for the proposed use. [OAR 660-009-0005(12)]

As described in the preceding text and graphics, the City excluded parcels smaller than 5 acres in size and portions of parcels with absolute development constraints (slopes >15%, floodway, inventoried wetlands, waterways, and riparian resources) from consideration when it analyzed the potentially suitable acreage within a grouping of parcels of a particular soil capability classification, as permitted under OAR 660-024-0060(5).

As described and shown in the preceding text and graphics, and as verified by supporting evidence (GIS and Lane County Assessor parcel maps and RLID parcel data) in the record, the City applied characteristics of parcel size, topography, and absolute development constraints (floodway, wetlands, riparian resources) to fourth priority land areas in the Preliminary UGB Study Area to identify potentially suitable land to meet the employment land need, when it conducted the boundary location alternatives analysis and applied ORS 197.298. [OAR 660-024-0060(1)(e) and OAR 660-024-0060 (5)] .

After excluding lands based on soil capability classification, the City's analysis identified parcel groupings in Table 15 that contain *potentially* suitable fourth priority land. These areas were identified for additional analysis study to determine serviceability and suitability to determine which candidate lands lands in the vicinity of the UGB can "reasonably accommodate" the identified employment land need.

Public Services Analysis of Potentially Suitable Fourth Priority Land

OAR 660-024-0060(7)

"For purposes of Goal 14 Boundary Location Factor 2, "public facilities and services" means water, sanitary sewer, storm water management, and transportation facilities."

Using GIS mapping and analysis tools and input received from the CIBL Technical Advisory Committee, City, County and State public agency staff including ODOT and Lane Transit District, other service providers and the public, the City conducted analysis to evaluate, compare and determine whether and how water, sanitary sewer, storm water management, and transportation facilities could be provided to potentially suitable fourth priority areas. The result of this step is a determination of whether parcels within each geographic grouping can reasonably be served to support the employment land uses identified in the CIBL/EOA within the 2010-2030 planning horizon.

The City correctly applied the requirement of OAR 660-024-0060(7) in its analysis of fourth priority land under ORS 197.298 by evaluating and comparing water, sanitary sewer, storm water management, and transportation facilities in its analysis of "public facilities and services", as demonstrated in the summary of data in Table 17 and as further supported by evidence in the record.

Table 17 summarizes and compares the opportunities and constraints associated with constructing public facilities and providing public services to lands in the vicinity of the Springfield UGB. The information summarized in Table 17 is based on information received from City engineering and transportation staff, the Springfield CIBL Technical Advisory Committee (TAC), service providers, public agency staff that were consulted with throughout the multi-year urbanization study process, and the public facilities plans identified in the previous sections of this report pages 212-235. The Public Facilities and Services Analysis identified physical constraints, engineering constraints, including legal constraints that affect or influence the physical placement of wastewater or stormwater management facilities.

The Public Services Analysis section of this report on pages 211-235 provides a general overview and maps of existing water, sanitary sewer, storm water management, and transportation facilities the City

referenced when it described the physical location and proximity of existing facilities to *potentially* suitable areas, when it identified physical or regulatory barriers that would make service extensions difficult or physically infeasible to support development within the 2010-2030 planning period, and when it evaluated impacts to facilities needed to serve lands already in the UGB. As previously noted, that section of the report provides explanation and evidence to support the City's findings addressing ORS 197.2989(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060(1)(c), OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR 660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c) — including additional evidence to support the City's rationale for excluding areas from consideration in the previous step.

The analysis includes a high planning level assessment of the relative degree of difficulty of providing public facilities and services. Early in the iterative multi-year analysis process, engineering and transportation staff, public service agency staff were asked to assign a numeric value ranging from 1-5 to assess and compare the relative degree of difficulty of providing public facilities and services to an area with 1=EASIER, 3=MEDIUM DIFFICULT, 5=DIFFICULT.⁴¹ The relative rankings assigned were based on conceptual-level discussion of the wastewater, transportation, and stormwater improvements that would likely be needed to provide these public services to serve general areas, not individual parcels. Relative degree of difficulty addressed providing services to the edge of an area and did not include providing services internally within an area. These discussions and assessments were not based upon detailed analysis and are therefore subject to change. The cost of providing infrastructure and services was not estimated or evaluated at this point in the analysis.

The City relied on the findings in Table 17 — as further documented by referenced facility plans, maps and supplemental evidence in the record — to determine whether *potentially suitable* candidate fourth priority lands can be served with public water, wastewater, stormwater, and transportation including public transit systems within the 2010-2030 planning period based on physical constraints. In this step, the City excluded lands it deemed not serviceable based on physical constraints — and therefore not suitable — from further consideration in the UGB Alternatives Analysis.

The City's evaluation of alternatives and its conclusions regarding serviceability and thus suitability are based on a comparative analysis of physical facilities and services constraints that is appropriate for this level of planning. The City applied service comparison factors uniformly to the land under each priority. The City's conclusions regarding which lands to exclude on the basis of public facilities constraints are reasonable and supported by evidence.

⁴¹ Draft Buildable Lands Inventory, 12/11/09 by City Engineer Ken Vogeney, input from Springfield Utility Board

Table 17: Fourth Priority Land: Public Facilities and Services Analysis Summary	
North Gateway	
The City excluded North Gateway — North of Sprague Road lands on the basis of agricultural capability classification.	
North Gateway – UGB to Sprague Road:	
Water	<p>1 Easier</p> <ul style="list-style-type: none"> • Abuts City limits • An existing 12” line in Maple Island Road is 200 feet from the area. • An existing 24” line in Corporate Way is approximately 450 feet from the area. • An existing 12” line in Sportsway (Royal Caribbean) is approximately 310 feet from the area or 1000 feet from the area via Sportsway.
Wastewater	<p>1 Easier</p> <ul style="list-style-type: none"> • Abuts City limits • Existing sewer connections are located approximately 500 feet (at Corporate Way) and 1,700 feet (at Royal Caribbean) to the area. • A pressure main will need to be extended from the end of the existing 8-inch main on the south side of the Royal Caribbean site north to the area. • A pressure main will need to be extended from the existing 8-inch main in Corporate Way north to the area. • Pump station upgrades will be required for the existing pump station at International Way and International Court. • Pump station upgrades will likely be needed for the existing pump station at Deadmond Ferry Road and Game Farm Road to accommodate the additional flows from the Corporate Way line. • Internal improvements needed within the area: a new medium sized wastewater pump station located at the intersection of Sports Way extension and the existing UGB, and a new small sized wastewater pump station located at the existing UGB to connect to the pressure main extension from Corporate Way.
Stormwater	<p>3 Medium Difficult</p> <ul style="list-style-type: none"> • Abuts City limits • Stormwater management through the use of on-site retention and/or infiltration may be possible but limited by proximity to Springfield Utility Board’s I-5 well field. • Physical connections to the McKenzie River or Maple Island Slough can be made with little or no impact on existing systems, although Maple Island Slough is currently blocked from flowing into the McKenzie River. A flow path would need to be restored if a significant amount of runoff is directed to the Slough. • The McKenzie River is federally classified as critical salmonid habitat. • Restoring a flow path from Maple Island Slough to the river will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, a designated Riparian Resource area, excavation in the waters of the state and waters of the United States, and potential wetlands. • New stormwater outfalls to the McKenzie River will also involve several other regulatory agencies for the same reasons as outfalls to Maple Island Slough. • Multiple overlapping regulatory jurisdictions for constructing new stormwater outfalls into the McKenzie River and/or the Maple Island Slough, and the limitations regarding on-site stormwater management, stormwater service for this area may present significant challenges and require atypical restrictions and limits.
Transportation including Transit	5 Difficult (Trip capacity)

	<p>1 Easier (Transit service)</p> <ul style="list-style-type: none"> • Abuts City limits • Nine offsite road extensions/improvements may be needed to provide service to the area: <ul style="list-style-type: none"> ○ Extension of Maple Island Slough Road northerly towards the Maple Island Slough then extending westerly to the connection with Sports Way.⁴² ○ Extension of Sports Way northerly to the existing UGB line. ○ Sprague Road overpass will likely need to be improved or reconstructed to accommodate traffic load and meet current design standards. Associated with this improvement, are improvements to Sprague Road westerly to Armitage Road. ○ Armitage Road will likely need to be widened from Sprague Road to North Game Farm Road. ○ Intersection improvements may be needed at Armitage Road and North Game Farm Road, such as the addition of a left turn lane and signal modifications. ○ A bridge connection may be needed from the extended Maple Island Slough Road to Tax Lot 170315400040 in order to reduce impacts to natural resource areas and to the flood plain carrying capacity. ○ Current studies for the Gateway/Beltline intersection and the Beltline/I-5 interchange show that current and planned development within the current UGB may not be able to be accommodated within the planning horizon, and potential mitigation projects have been identified. The additional vehicle trips from the North Gateway Area will require additional lane and intersection capacity that is not available in the planned mitigation projects, so that additional capacity will need to be provided.⁴³ ○ Extension of Maple Island Slough Road Southerly from Game Farm Road to a connection point with Beltline Road.⁴⁴ ○ The addition of capacity improvements will likely be needed for the interchange operations at Beltline Road and Interstate 5.⁴⁵ • Internal improvement needed within the area: Bridge connection from Tax Lot 17031540004000 over the Maple island Slough to Tax Lot 1703100002500 to provide internal circulation and reduce impacts to natural resource areas and to the flood plain carrying capacity. • Capacity constraints at Gateway/Beltline and Beltline/I-5 will pose significant challenges for development within the planning horizon. • The need to construct bridges to provide services and internal circulation will pose significant challenges for development within the planning horizon. • International Way is part of an existing and planned Frequent Transit Network route in the TSP and RTP. Area is within ½ mile of the existing EmX bus rapid transit line (RiverBend-Gateway) and EmX station located at International Way/Maple Island Road.
<p>Urban services conclusion/ physical constraints North Gateway</p>	<p>Area is serviceable as described in OAR 660-009-0005(9). The City included the North Gateway Fourth Priority lands south of Sprague Road in the UGB.</p> <ul style="list-style-type: none"> • Area is not physically constrained by slopes, river crossings or distance that would preclude provision of services as defined in OAR 660-009-0005(9).

⁴² Roadway project is shown in Springfield TSP Figure 10 Recommended Roadway Network.

⁴³ “Gateway-Beltline intersection capacity improvements” is a project identified in the Springfield TSP.

⁴⁴ Project is identified in the Springfield TSP.

⁴⁵ Project is identified in the Springfield TSP.

<p>Fourth Priority lands</p>	<ul style="list-style-type: none"> • Proximity to the City and existing service connections increases the feasibility of extending or upgrading infrastructure and services to provide adequate capacity within the 20-year planning period ending 2030. • Protection of drinking water resources will present significant challenges for development within this area and will require special restrictions and/or limits. • Transportation constraints may present significant challenges for development within the planning horizon and may require atypical restrictions, limits or solutions.
<p>McKenzie View</p>	
<p>The City excluded unconstrained McKenzie View lands comprising predominantly Class I and II soils on the basis of agricultural capability classification.</p>	
<p>Water</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Separated from urban services by the McKenzie River, must cross river with urban services • Would need to bore under river (if permitted) to extend public water service main • Nearest water transmission line is a 24" line in the vicinity of 28th Street/Yolanda, approximately 6,000-8000 feet from potentially suitable parcels • Services would need to be extended through un-annexed land.
<p>Wastewater</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Separated from urban services by the McKenzie River, must cross river with urban services • Nearest collection system is across the river and more than 2,000 feet away: a 15" line in Vera Street. • Would need to upgrade Vera pump station. • Would need to bore under river (if permitted) to extend service main, then gravity flow to East Springfield interceptor. • Services would need to be extended through un-annexed land.
<p>Stormwater</p>	<p>3 Medium Difficult</p> <ul style="list-style-type: none"> • Separated from urban services by the McKenzie River • Isolated by distance and topography from existing urban services. • No developed system or outfalls in vicinity • New stormwater outfalls will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands. • The McKenzie River is federally classified as critical salmonid habitat. • Services would need to be extended through un-annexed land.
<p>Transportation (including transit service)</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Access from Springfield and I-5 is via McKenzie View Drive, a Rural Minor Collector – approximately 4.5 miles from UGB at Game Farm Rd.; or across the McKenzie River via Marcola Rd. (Rural Major Collector, 46-36' wide), Old Mohawk Rd. (Rural Minor Collector), and Hill Rd. (Rural Minor Collector) - approximately 4 miles from UGB at

	<p>Hayden Bridge.</p> <ul style="list-style-type: none"> No access to Springfield or to I-5 except via Coburg Rd or Marcola Rd unless a new bridge over the McKenzie River is built. Depending upon new bridge location, existing Springfield street network would need to be upgraded and collectors/arterials added to provide transportation capacity. All roads will need improvement to accommodate industrial or commercial development and multi-modal access Services would need to be extended through un-annexed land. Intersection improvements needed at Coburg Rd & McKenzie View Drive Upgrade McKenzie View Drive to urban standards and provide capacity improvements Marcola Road: "With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length." ⁴⁶ No transit services, pedestrian facilities or ADA access in area. Same findings as Mohawk area regarding a need for upgrades to 42nd St., 42nd/Marcola intersection and 42nd and Hwy 126 interchange
<p>Urban services conclusion/ physical constraints McKenzie View Fourth Priority lands</p>	<p>The City excluded the McKenzie View Fourth Priority lands from consideration because this area does not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield's identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).</p>
<p>Oxbow/Camp Creek</p>	
<p>The City excluded lands comprising predominantly Class I, Class II and Class III High Value Farmland soils on the basis of agricultural capability classification.</p>	
<p>Water</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> Isolated by distance and topography from existing urban services Separated from urban services by the McKenzie River, must cross river with urban services Nearest water transmission line is a 16" line Marcola Rd. /Hayden Bridge River is a barrier to extension of water transmission that makes extension of public water system infeasible ⁴⁷ Same findings as Mohawk are applicable. Services would need to be extended through un-annexed land.
<p>Wastewater</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> Isolated by distance and topography from existing urban services Separated from urban services by the McKenzie River, must cross river with urban services

⁴⁶ Lane County Weight Restricted Bridges and Approved Route List (Revised 02-2014), <http://www.odot.state.or.us/forms/motcarr/od/4020.pdf>, website accessed 2-5-16

⁴⁷ See email from City Civil Engineer Clayton McEachern P.E., to Linda Pauly, dated 2/8/16 describing physical constraints to extending a water transmission line across the McKenzie River either via the existing bridge or by boring underwater.

	<ul style="list-style-type: none"> • Would require pumping across the river and expanding capacity in existing sewer in Marcola Road (existing UGB). Geology precludes boring under river in this location. • EWEB intake at Hayden Bridge is the intake for the City of Eugene’s water supply. • Would require new trunk line from North Springfield Interceptor to and along Hayden Bridge Rd and new pump stations inside area to get flow to new trunk. Bridge is high point. Pump stations are needed to bring flow up to bridge and across river, then gravity flow to interceptor. • Nearest collection system is a 10” line in Marcola Rd., more than 4,000 feet from Hayden Bridge. • Eastern Camp Creek parcels approximately 5 miles from nearest wastewater connection via Hayden Bridge/Marcola Rd. or via Hendricks Bridge/Main Street. • Same findings as Mohawk are applicable. • Services would need to be extended through un-annexed land.
<p>Stormwater</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • Separated from urban services by the McKenzie River • No new outfalls permitted upstream from Hayden Bridge (Three Basin Rule)⁴⁸ • EWEB intake at Hayden Bridge is the intake for the City of Eugene’s water supply. • No developed system or existing discharge permits in vicinity • Same findings as Mohawk are applicable • Services would need to be extended through un-annexed land.
<p>Transportation (including transit service)</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Access from Springfield and I-5 is across the McKenzie River via Marcola Rd. (Rural Major Collector, 46-36’ wide), Old Mohawk Rd. (Rural Minor Collector/Rural Local Collector, 30’ wide), and Camp Creek Rd. (Rural Major Collector, 30’ wide). Roads may need improvement to accommodate additional development and multi-modal access: • Upgrade 42nd St. to urban standards • Upgrade 42nd/Marcola intersection • Upgrade 42nd and Hwy 126 interchange • Upgrade Camp Creek to urban standards and provide capacity improvements • Would require internal collector street system • Marcola Road: “With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length.”⁴⁹ • No transit services, pedestrian facilities or ADA access in area. • Same findings as Mohawk are applicable. • Services would need to be extended through un-annexed land.
<p>Urban services conclusion: Oxbow/Camp Creek Fourth</p>	<p>The City excluded the Oxbow/Camp Creek area from consideration because these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided</p>

⁴⁸ OAR 340-041-0350(1)(b) prohibits new or increased waste discharges that require NPDES permit, WPCF permit, or 401 Certification to the waters of the McKenzie River Subbasin above the Hayden Bridge (river mile 15).

⁴⁹ Lane County Weight Restricted Bridges and Approved Route List (Revised 02-2014), <http://www.odot.state.or.us/forms/motcarr/od/4020.pdf>, website accessed 2-5-16

Priority lands	with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield's identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).
Hayden Bridge	
The City excluded unconstrained lands on the basis of agricultural capability classification.	
Mohawk	
The City excluded unconstrained lands on the basis of agricultural capability classification.	
Water	<p>5 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Separated from urban services by the McKenzie River, must cross river with urban services • River is a barrier to extension of water transmission that makes extension of public water system infeasible⁵⁰ • Nearest water transmission line is a 16" line at Marcola Rd. /Hayden Bridge
Wastewater	<p>5 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Separated from urban services by the McKenzie River, must cross river with urban services • Will require pumping across the river and expanding capacity in existing sewer in Marcola Road (existing UGB). Geology precludes boring under river in this location. A line rupture in this location could contaminate Eugene's water supply. • Would require new trunk line from North Springfield Interceptor to and along Hayden Bridge Rd and new pump stations inside area to get flow to new trunk. Bridge is high point. Pump stations are needed to bring flow up to bridge and across river, then gravity flow to interceptor. • Nearest collection system is a 10" line in Marcola Rd., more than 4,000 feet from UGB, and 4 miles to outer areas
Stormwater	<p>5 Difficult</p> <ul style="list-style-type: none"> • Separated from urban services by the McKenzie River • No new outfalls permitted upstream from Hayden Bridge (Three Basin Rule⁵¹) • Eugene Water and Electric Board's water intake at Hayden Bridge would require significant separation from any new outfalls developed downstream from the intake⁵² • No developed system in vicinity
Transportation (including transit service)	<p>5 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Access to Springfield is across the McKenzie River via 42nd Street and Marcola Rd. (Rural Major Collector, 46-36' wide), Old Mohawk Rd. (Rural Minor Collector/Rural

⁵⁰ See email from City Civil Engineer Clayton McEachern P.E., to Linda Pauly, dated 2/8/16 describing physical constraints to extending a water transmission line across the McKenzie River either via the existing bridge or by boring underwater.

⁵¹ OAR 340-041-0350(1)(b) prohibits new or increased waste discharges that require NPDES permit, WPCF permit, or 401 Certification to the waters of the McKenzie River Subbasin above the Hayden Bridge (river mile 15).

⁵² See email from City Civil Engineer Clayton McEachern P.E., to staff Pauly, dated 2/8/16 describing physical factors that preclude construction of new stormwater outfalls in the vicinity of EWEB's Hayden Bridge McKenzie River water intake facility.

	<p>Local Collector, 30' wide), and Camp Creek Rd. (Rural Major Collector, 30' wide).^{53 54} Roads may need improvement to accommodate additional development and provide multi-modal access:</p> <ul style="list-style-type: none"> • Upgrade 42nd St. to urban standards⁵⁵ • Upgrade 42nd/Marcola intersection • May need to upgrade 42nd and OR 126 interchange⁵⁶ • Upgrade Camp Creek to urban standards and provide capacity improvements • Would require internal collector street system. • Existing bridge in place, but would need to be improved to provide full urban standards including multi-modal access. • Urban standards and capacity improvements needed on existing and future collector system from Mohawk/Highway 126 interchange to area, including Hayden Bridge Rd, 19th St, 23rd St, and 31st St • Previous ODOT study showed a need for upgrading at Hwy 126 and 42nd St. (without UGB expansion). Traffic backs up at the 42nd St. rail crossing at entrance to the IP plant, causing delays with access to Hwy 126. • Located 1-5 miles mile from Highway 126/I-105, and I-5 • Steep slopes east of Marcola Rd. • Access would route traffic through farmland and rural residential areas • Marcola Road and Old Mohawk Road: "With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length."⁵⁷ • No transit services, pedestrian facilities or ADA access in area. Nearest service is Route 17 Hayden Bridge Rd. and 19th Street. Route Description: "The route begins at Springfield Station (Bay B) and travels North on 5th Street where it serves Springfield City Hall and Library and the Fred Meyer Shopping Center. The bus travels East on Hayden Bridge Place, North on 7th Street, West on Hayden Bridge Road, and South onto 19th Street where it serves Mohawk Marketplace. The bus travels West on Q Street and South on 5th Street to return to Springfield Station."⁵⁸
<p>Urban services conclusion/ physical constraints Mohawk</p>	<p>The City excluded the Mohawk Fourth Priority lands from consideration on the basis of agricultural capability classification. These lands do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to</p>

⁵³ Source of Functional Classifications: 2004 Lane County Transportation System Plan Functional Class Subarea 14 Map 4-14

⁵⁴ Source of road widths: Lane County Roads Inventory, http://www.lanecounty.org/Departments/PW/TransPlanning/Documents/AppendixB_RoadsInventory.pdf

Accessed January 26, 2016

⁵⁵ Project # R-41 42nd St. from Marcola Rd. to railroad tracks is listed as a "20-year priority project" in the Springfield 2035 TSP Attachment A.

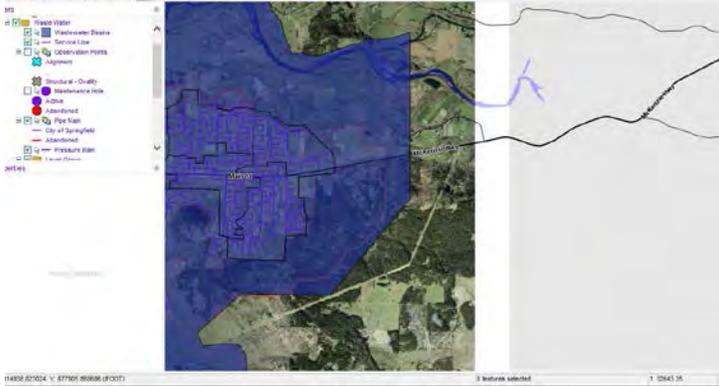
⁵⁶ See ODOT staff Helton email to staff Reesor, Dec. 29, 2008: "The interchange on Hwy 126 at 42nd St. has failing segments even with planned improvements, but it can probably be made to operate with additional improvements to the local system." Project #R-35 is identified as a "Beyond 20-year Project" in the 2035 Springfield TSP, Appendix A, p. 14.

⁵⁷ Lane County Weight Restricted Bridges and Approved Route List (Revised 02-2014), <http://www.odot.state.or.us/forms/motcarr/od/4020.pdf>, website accessed 2-5-16.

⁵⁸ Email from LTD staff Will Mueller, dated June 28, 2013 provides comments describing the physical requirements necessary to provide transit service applicable to extending transit service to any new areas: "Connecting roadways and streets would need to be constructed to city standards that support LTD's buses including sufficient lane width, intersection curb radii, and sidewalk width at prospective bus stops to meet ADA standards in effect at time of construction (2013 standards require 8' sidewalks at bus stops).

<p>Fourth Priority lands</p>	<p>physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).</p>
<p>North Springfield Highway</p>	
<p>The City excluded unconstrained parcels on the basis of agricultural capability classification.</p>	
<p>Water</p>	<p>1 Easier</p> <ul style="list-style-type: none"> • Abuts City Limits • An older 12” line in High Banks road is approximately 270 feet from the area. • A newer 24” line is in 52nd Street to serve Hyland Business Park, approximately 1300 feet from the area via High Banks Road.
<p>Wastewater</p>	<p>1 Easier</p> <ul style="list-style-type: none"> • Abuts City Limits • A new large wastewater pump station is required to get flow from this area into the existing 15-inch main in High Banks Road. For this study, the location for the new large pump station was assumed to be in the vicinity of High Banks Road and 52nd Street. • Internal improvements needed within the area: new small sized wastewater pump stations located in the vicinity of Tax Lot 1702280000304 and Northwest portion of the Tax Lot 1702280000103.
<p>Stormwater</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • Abuts City Limits • Physical connections to Cedar Creek or the McKenzie River can be made with little or no impact on existing stormwater systems. Oregon’s Three Basin Rule (OAR 340-041-0350) restricts new stormwater outfalls and other discharges to the McKenzie River upstream of Hayden Bridge. • New stormwater outfalls to Cedar Creek or to the McKenzie River will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands. • Stormwater management through the use of on-site retention and/or infiltration may be allowable in this area as it is outside of the zone of contribution for Springfield Utility Board’s wells. • The McKenzie River and Cedar Creek are federally classified as critical salmonid habitat. Considering the multiple overlapping regulatory jurisdictions for constructing new stormwater outfalls into the McKenzie River and/or Cedar Creek, stormwater service for this area may be feasible if on-site stormwater management techniques that maximize stormwater retention and infiltration are required.
<p>Transportation (including transit service)</p>	<p>2 Easier</p> <ul style="list-style-type: none"> • Abuts City Limits • Four offsite road extensions/improvements are needed to provide service to the area: <ul style="list-style-type: none"> ○ A new at grade intersection or interchange will be needed at the intersection of OR Highway 126 and 52nd Street. ○ Intersection improvements for increased capacity will be needed at the intersection of Main Street and OR Highway 126. ○ A new at grade intersection improvement will be needed for the intersection of 52nd Street and High Banks Road. ○ A new at grade intersection improvement will be needed for the intersection of 58th Street and High Banks Road. • Internal improvements needed within the area: bridge connections over existing ditches

	and creeks to access the northern portion of the area.
Urban services conclusion/ physical constraints North Springfield Highway Fourth Priority lands	<ul style="list-style-type: none"> • Area is serviceable for water, wastewater and transportation as described in OAR 660-009-0005(9). Area is not physically constrained by slopes, river crossings or distance that would preclude feasible provision of water, wastewater and transportation services. • Area is physically constrained for stormwater management due to existing physical capacity limitations on receiving streams within the basin, floodplain, and regulatory restrictions on new discharges to receiving streams and rivers. • Stormwater management may become physically feasible if regulatory barriers can be met through use of engineered on-site stormwater management facilities that maximize stormwater retention and infiltration.
Thurston	
The City excluded unconstrained land comprising predominantly Class I and II soils on the basis of agricultural capability classification.	
Far East	
The City excluded unconstrained land comprising predominantly Class I and II soils (north of Highway 126) on the basis of soils capability classification.	
The unconstrained land south of Highway 126 was excluded on the basis of specific land needs (197.298(3)(a)).	
Water	<p>Within one mile of UGB 2: Medium</p> <p>More than one mile from UGB: 5 Difficult</p> <ul style="list-style-type: none"> • Separated from urban services by distance and topography. • The nearest transmission line is the 12" line terminating ½ mile east of the existing UGB on Main St/Hwy 126. • Services would need to be extended through un-annexed land. • Distant from SUB service area. • Higher elevations would require pumping and reservoir.
Wastewater	<p>5 Difficult</p> <ul style="list-style-type: none"> • Separated from urban services by distance and topography. • The nearest service connection of sufficient size for industrial and commercial uses is the 15" line at Main Street/S. 72nd, approximately 1.5 miles to the western boundary of the area • Services would need to be extended through un-annexed land. • May require a new pump station at bottom of Cedar Flat/126 and force main to bring gravity flow to Thurston trunk sewer. May need to be a stepped system to address topography. • New or upgrade trunk line may be needed in Thurston Rd. from North Springfield interceptor at International Paper (unfunded upgrade project is identified in CIP). • Services would need to be extended through un-annexed land. • Steep slopes south of McKenzie Hwy/Main St.

	 <p>City of Springfield wastewater basin (shown in blue) and service main in relationship with Far East, Thurston and Oxbow/Camp Creek areas</p>
<p>Stormwater</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • No developed system in vicinity • Cedar Creek drainage basin is nearing stormwater receiving capacity^{59, 60} (unfunded upgrade project is identified in CIP). • No new outfalls permitted on McKenzie River upstream from Hayden Bridge (Three Basin Rule)⁶¹ • Sensitive environmental protection/salmonid species habitat restoration projects will limit/restrict new outfalls • Ability to manage stormwater on-site will be limited by high water table and typically⁶² requires 8-10% of parcel area. • Services would need to be extended through un-annexed land.
<p>Transportation (including transit service)</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • Separated from urban services by distance and topography. • Access is from E. Main Street/McKenzie Hwy (State Highway), with secondary access from Thurston Road (Rural Major Collector). • Two new bridges would be needed over Cedar Creek on 66th and Weaver Lane. • 66th St., Weaver Lane and Billings Rd. would require urban standards improvements and capacity upgrades. • Extend Billings Rd. to E. Main St. • Upgrade capacity on 66th St. from Main St. to Thurston Rd. • Upgrade capacity on Thurston Rd. and provide urban standards from 69th St. to E. Main Street • Improve Thurston Rd between Weaver Rd. and UGB⁶³ • Intersection improvements at Thurston Rd. and E. Main St.

⁵⁹ City of Springfield Stormwater Facilities Master Plan, Oct. 2008; City of Springfield Stormwater Management Plan, updated 2010, <http://springfield-or.gov/ESD/stormwater%20management%20plan%202008.pdf>, accessed 2/8/16.

⁶⁰ City of Springfield Stormwater Basin Characterization Study, Lane Council of Governments, 2008, pp. 17-26 describes existing outfalls and water quality concerns in this basin.

⁶¹ OAR 340-041-0350(1)(b) prohibits new or increased waste discharges that require NPDES permit, WPCF permit, or 401 Certification to the waters of the McKenzie River Subbasin above the Hayden Bridge (river mile 15). The McKenzie supports anadromous and resident fish species and is considered “essential fish habitat” for threatened and endangered species (Table 11, p. 20).

⁶² Eugene Stormwater Management Manual “Simplified Method”, Appendix C, is a rule of thumb Springfield engineers use for typical small developments.

⁶³ Project #US-14 is identified in the 2030 Springfield TSP as a Priority Project on the 20-year project list, Projects on Lane CO. Facilities, Attachment A, with an estimated cost of \$4,800,000.

	<ul style="list-style-type: none"> • Would need internal collector street system • Access to Exception C from Cedar Flat Road, Rural Local Collector • slopes between E. Main Street/McKenzie Hwy and parcels limit constrain options • “Main St/Straub Parkway intersection is failing today even with planned interchange improvements”, and there are safety issues with signal. Traffic would need to be distributed differently. Significant development would need to participate in funding of ODOT IAMP. Impacts to the OR126/Main St intersection should be considered. ODOT’s previous analysis indicate that the OR 126/Main St, Main St/54th St. and Main St/58th St all exceed capacity by 2031. ^{64, 65} • Services would need to be extended through un-annexed land. • Frequent transit service is not planned beyond Thurston Station.
<p>Urban services conclusion: Far East Fourth Priority lands</p>	<p>Far East Fourth Priority lands within 1 mile of the UGB were considered physically serviceable for water and transportation during the 20-year planning period ending 2030 as described in OAR 660-009-0005(9).</p> <ul style="list-style-type: none"> • Area is physically constrained for stormwater management due to existing physical capacity limitations on receiving streams within the basin, floodplain, and regulatory restrictions on new discharges to receiving streams and rivers. • Stormwater management may become physically feasible if regulatory barriers can be met through use of engineered on-site stormwater management facilities that maximize stormwater retention and infiltration. • Area is physically constrained for wastewater service. Distance would likely preclude feasible extension of wastewater service within the 20-year planning period. <p>The City excluded the Far East Fourth Priority lands farther than 1 mile from the UGB from consideration because this area does not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).</p>
South Hills	
<p>The City excluded unconstrained lands comprising predominantly Class III High Value Farmland soils on the basis of agricultural capability classification.</p>	
<p>The City excluded unconstrained lands on the basis of specific land needs (197.298(3)(a)).</p>	
West Jasper/Mahogany	
<p>The City excluded unconstrained lands comprising predominantly Class II soils on the basis of agricultural capability classification.</p>	
<p>The City excluded unconstrained parcels on the basis of specific land needs (197.298(3)(a)).</p>	

⁶⁴ Comment received ODOT staff Crawford, meeting on June 11, 2013 and email dated June 18, 2013.

⁶⁵ Interchange improvements at Main St/Hwy 126 and Highway 126 at 52nd are listed as financially constrained projects in the Regional Transportation Plan (RTP) and are identified as 20-year Priority Projects in the 2035 Springfield TSP, Attachment A .

Water	<p>3 Medium Difficult</p> <ul style="list-style-type: none"> • The nearest lines of sufficient size to serve industrial or commercial employment uses are the 16" line in South 57th /Mount Vernon Rd. and 16" line at Linda Lane, located approximately ½ mile from the eastern boundary of the area at Mahogany Lane. • Services would need to be extended under the Union Pacific railroad line and across Jasper Road.⁶⁶
Wastewater	<p>1 Easier</p> <ul style="list-style-type: none"> • The Jasper Trunk sewer 27" line is located approximately 200 feet to the east across Jasper Road and the railroad to the boundary of this area. • Services would need to be extended through un-annexed land and would require easements to facilitate feasible service connections • A large wastewater pump station will be needed in the vicinity of the intersection of Mt. Vernon Road and Jasper Road, on the north side of the Union Pacific Railroad mainline to get flows from Mahogany Lane area into the Jasper Trunk Sewer. Capacity in this Trunk Sewer is not expected to be a concern because flow timing and rates can be managed via the pump station.
Stormwater	<p>3 Medium Difficult</p> <ul style="list-style-type: none"> • Physical connections to the Middle Fork Willamette River and Jasper Slough system can be made with little or no impact on existing stormwater systems, although the flow capacity of portions of Jasper Slough system would likely need to be increased before additional runoff could be directed to it. • Few if any of the intermittent flow channels of the Jasper Slough system are maintained as drainage ways. Development of the area will require public acquisition and improvement of at least some of these channels to ensure that stormwater runoff can be safely conveyed to the River. • The Middle Fork Willamette River and Jasper Slough system are federally classified as critical salmonid habitat. • New stormwater outfalls will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands. • Stormwater management through the use of on-site retention and/or infiltration would likely not be allowed in the area due to its proximity to Springfield Utility Board's Willamette well field.
Transportation including Transit	<p>5 Difficult</p> <ul style="list-style-type: none"> • Eight offsite road extensions/improvements are needed to provide service to the area: <ul style="list-style-type: none"> ○ Intersection improvements will be needed at Jasper Road and Mt. Vernon Road, which will include improvements to the Union Pacific Railroad crossing and a new traffic signal. ○ Improvements to Mt. Vernon Road from Jasper Road to South 57th Street will be required for additional capacity. ○ Intersection improvements will be needed at Bob Straub Parkway and Mt. Vernon Road, which will include a new traffic signal. ○ Intersection improvements will be needed at Bob Straub Parkway and Jasper Road, which will include a new traffic signal. ○ A new road connection from Bob Straub Parkway to Jasper Road will be needed in the vicinity of Tax Lot 1802090000103, which will include a new grade separated crossing over the railroad. ○ Improvement of the entire length of Jasper Road to urban standards and upgrade to

⁶⁶ Bart McKee, SUB stated that it would be physically possible to bore under the railroad in the vicinity to extend water service to the area.

	<p>4 lanes to Main Street via South 42nd Street, including Union Pacific mainline crossing upgrades on South 42nd Street and intersection upgrades along the length of the entire corridor.</p> <ul style="list-style-type: none"> ○ Improvements to Bob Straub Parkway from Jasper Road to Daisy Street, upgrading to 4 lanes. ○ Intersection improvements will be needed at Bob Straub Parkway and Daisy Street. <ul style="list-style-type: none"> ● Internal improvements needed within the area: <ul style="list-style-type: none"> ○ A new small sized wastewater pump station will likely be needed located in the vicinity of the southerly end of Tax Lot 1802090000600. ○ A new small sized wastewater pump station will likely be needed located in the vicinity of the easterly side of Tax Lot 1802090000200. ○ It is anticipated one or two additional small pump stations may be needed to serve some portions of the area depending upon future development configuration and topography. ○ Improvements to the existing Mahogany Lane will be needed for additional capacity. ○ The potential for two bridge connections over flood plain designated sloughs to facilitate internal circulation.
<p>Urban services conclusion: West Jasper/ Mahogany Fourth Priority lands</p>	<p>Area was considered physically serviceable during the 20-year planning period ending 2030 as defined in OAR 660-009-0005(9).</p> <ul style="list-style-type: none"> ● Area is not physically constrained by slopes, river crossings or distance that would preclude provision of services as defined in OAR 660-009-0005(9). ● Proximity to the City and existing wastewater service connection increases the feasibility of extending or upgrading infrastructure and services to provide adequate capacity within the 20-year planning period ending 2030. ● Protection of drinking water resources will present significant challenges for development within this area and will require special restrictions and/or limits. ● The significant needs for transportation facility upgrades to serve industrial and commercial employment uses present significant challenges for development within the planning horizon.
Jasper Bridge	
<p>The City excluded area comprising predominantly Class I and II soils on the basis of agricultural capability classification.</p>	
<p>Urban services conclusion: Jasper Bridge Fourth Priority lands</p>	<p>The City excluded the Jasper Bridge Fourth priority lands from consideration because these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).</p>
Clearwater	
<p>The City excluded unconstrained parcels comprising predominantly Class II soils on the basis of agricultural capability classification.</p>	
<p>The City excluded unconstrained parcels on the basis of specific land needs (197.298(3)(a)).</p>	
Water	3 Medium Difficult

	<ul style="list-style-type: none"> • 16" line in the vicinity of Daisy and 48th Street (Westwind) is approximately ½ mile north of the UGB • Nearest 12" line is in South 42nd approximately ¼ mile to the UGB via 42nd Street
Wastewater	<p>2 Easier</p> <ul style="list-style-type: none"> • The Jasper Trunk sewer 27" line is located along Jasper Road. • Distance to potentially suitable land varies from approximately 330 feet at 42nd Street to 200 feet (across Jasper Slough) at 41st/Filbert Meadows to 1364 feet at South 39th • Services would need to be extended through un-annexed developed residential land to reach some portions of this area.
Stormwater	<p>3 Medium Difficult</p> <ul style="list-style-type: none"> • Physical connections to the Middle Fork Willamette River and Jasper Slough system can be made with little or no impact on existing stormwater systems, although the flow capacity of portions of Jasper Slough system would likely need to be increased before additional runoff could be directed to it. • Few if any of the intermittent flow channels of the Jasper Slough system are maintained as drainage ways. Development of the area will require public acquisition and improvement of at least some of these channels to ensure that stormwater runoff can be safely conveyed to the River. • The Middle Fork Willamette River and Jasper Slough system are federally classified as critical salmonid habitat. • New stormwater outfalls will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands. • Stormwater management through the use of on-site retention and/or infiltration would likely not be allowed in the area due to its proximity to Springfield Utility Board's Willamette well field.
Transportation	<p>5 Difficult</p> <ul style="list-style-type: none"> • Clearwater Lane would need to be upgraded to urban standards and may be of to serve industrial and commercial employment uses.⁶⁷ • Secondary access would be required. • Offsite road extensions/improvements are needed to provide service to the area: <ul style="list-style-type: none"> ○ Intersection improvements will be needed at Jasper Road and Mt. Vernon Road, which will include improvements to the Union Pacific Railroad crossing and a new traffic signal. ○ Improvements to Mt. Vernon Road from Jasper Road to South 57th Street will be required for additional capacity. ○ Intersection improvements will be needed at Bob Straub Parkway and Mt. Vernon Road, which will include a new traffic signal. ○ Intersection improvements will be needed at Bob Straub Parkway and Jasper Road, which will include a new traffic signal. ○ Improvement of the entire length of Jasper Road to urban standards and upgrade to 4 lanes to Main Street via South 42nd Street, including Union Pacific mainline crossing upgrades on South 42nd Street and intersection upgrades along the length of the entire corridor. ○ Improvements to Bob Straub Parkway from Jasper Road to Daisy Street, upgrading to 4 lanes. ○ Intersection improvements will be needed at Bob Straub Parkway and Daisy Street.

⁶⁷ Urban Standards Project US-14: Clearwater Lane – south of Jasper Road to UGB is identified in TSP Projects located on Lane County facilities in the TSP Table 1 as a Priority Project in the 20-year project list.

	<ul style="list-style-type: none"> Internal improvements be needed within the area: small-medium sized wastewater pump station to get flow to Jasper Trunk Nearest transit service is along Main Street, approximately ¾ mile to UGB/northern boundary of area A planned bike boulevard along Virginia-Daisy is approximately ½ mile to UGB/northern boundary of area.
Urban services conclusion: Clearwater Fourth Priority lands	<p>Area is physically serviceable as defined in OAR 660-009-0005(9). Area is not physically constrained by slopes, river crossings or distance that would preclude feasible provision of water, wastewater and transportation services.</p> <ul style="list-style-type: none"> Proximity to the City and existing wastewater service connection increases the feasibility of extending or upgrading infrastructure and services to provide adequate capacity within the 20-year planning period ending 2030. Protection of drinking water resources will present significant challenges for development within this area and will require special restrictions and/or limits. The significant needs for transportation facility upgrades to serve industrial and commercial employment uses present significant challenges for development within the planning horizon.
Mill Race	
Water	<p>1 Easier</p> <ul style="list-style-type: none"> There is ample existing water distribution infrastructure already located within this area to serve industrial and commercial employment uses. SUB's existing 60" line in South 28th Street extends south of the Mill Race along the eastern boundary of this area.⁶⁸ Existing 20" and 16" lines cross the Mill Race. A 16" line extends south to wellfield site via easements on private lands. A new 24" line was recently installed along the north side of the Mill Race. A T was installed in F Street to extend a 12" line to serve properties adjacent to the Swanson Mill site. There are no major improvements anticipated to meet the internal water service needs within this area.
Wastewater	<p>3 Medium Difficult</p> <ul style="list-style-type: none"> The nearest wastewater line is the 48" trunk line in F Street at 28th Street, located approximately 1400-1700 feet from the area. A new small sized wastewater pump station located near the south side of the South 28th Street Bridge over the Mill Race will be needed to provide service to this area. A main line extension in south 28th Street from the South F Street interceptor to the new pump station will be needed. Abuts City limits There are no major improvements anticipated to meet the internal wastewater needs to serve this area.
Stormwater	<p>3 Medium Difficult</p> <ul style="list-style-type: none"> Physical connections to the Springfield Mill Race, Gory Creek or Quarry Creek can be made with little or no impact on existing systems, although the flow capacity of the two creeks would likely need to be increased before additional runoff could be directed to them. New stormwater outfalls to any of these three receiving waters will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, a designated Riparian Resource area, excavation in the waters of the state and

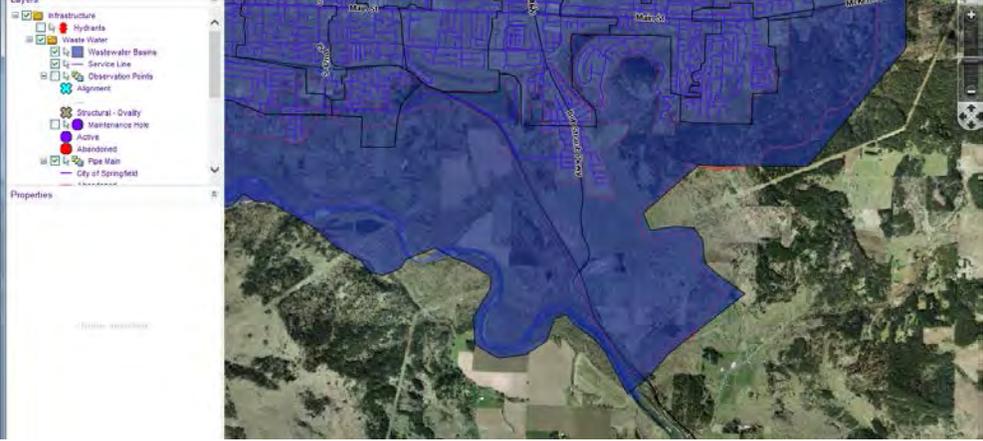
⁶⁸ Updated water line information provided by Bart McKee, SUB (telephone call with staff Pauly, April 5, 2016).

	<p>waters of the United States, and potential wetlands. New stormwater outfalls to the Springfield Mill Race are also regulated by an intergovernmental agreement with the US Army Corps of Engineers as part of the Mill Race enhancement project.</p> <ul style="list-style-type: none"> • Stormwater management through the use of on-site retention and/or infiltration would likely be limited in this area due to its proximity to Springfield Utility Board’s Willamette well field. • Abuts City limits • The Middle Fork Willamette River is federally classified as critical salmonid habitat and the Springfield Mill Race enhancement project was performed to provide additional salmonid habitat. • Stormwater service within this area may require atypical restrictions and solutions and will present significant challenges considering the multiple overlapping regulatory jurisdictions for constructing new stormwater outfalls into the Springfield Mill Race, Gory Creek or Quarry Creek, and the limitations regarding on-site stormwater management. • There are no major improvements anticipated to meet the internal stormwater needs to serve this area.
<p>Transportation</p>	<p>4 Difficult Abuts City limits Five offsite road extensions/improvements are needed to provide service to the area:</p> <ul style="list-style-type: none"> • South 28th Street will need to be improved from Main Street southerly to the existing UGB near the Mill Race.⁶⁹ • Crossing improvements for the intersection of South 28th Street and the Union Pacific Railroad will be needed. • Upgrades to the existing South 28th Street bridge at the Mill Race may be required due to weight limit restrictions. • Intersection improvements will be needed at the intersection of Main Street and South 28th Street. • A secondary access will be needed. Options include improving access via South F Street or bridge over the Mill Race and Jasper Slough to a connection point near the intersection of Jasper Road and South 32nd Street. • Service to this area may be feasible; however providing service will have significant challenges due to the need for improving access and providing secondary access. This access may require constructing a bridge over Mill Race and Jasper Slough to a connection point near the intersection of Jasper Road and South 32nd Street. • Existing frequent transit service is available on Main Street, approximately .75 miles from the UGB at 28th Street. The Main Street Corridor is a planned Frequent Transit Network route in the TSP and RTP. The area is within ½ mile of the Main Street Corridor (South A). • Planned and funded bicycle facilities along the Mill Race/Booth Kelly Road will provide ped/bike connectivity between Main Street, Downtown Springfield and Mid-Springfield and the existing Middle Fork Path recreational path system immediately adjacent to this area. • There are no major improvements anticipated to meet the internal transportation needs to serve this area.
<p>Urban services conclusion:</p>	<p>Area is serviceable as described in OAR 660-009-0005(9). The City included the Mill Race Fourth Priority lands in the UGB.⁷⁰</p>

⁶⁹ Urban Standards Project US-7: South 28th Street – F Street to UGB is identified in TSP Projects located on Lane County facilities, Table 4 as a Beyond 20-year project.

<p>Mill Race Fourth Priority lands</p>	<ul style="list-style-type: none"> • Area is not physically constrained by slopes, river crossings or distance that would preclude provision of services as defined in OAR 660-009-0005(9). • Proximity to the City and existing service connections increases the feasibility of extending or upgrading infrastructure and services to provide adequate capacity within the 20-year planning period ending 2030. • Protection of drinking water resources will present significant challenges for development within this area and will require special restrictions and/or limits.
<p>Wallace Creek</p>	
<p>The City excluded unconstrained lands comprising predominantly Class II and Class III High Value Farmland soils on the basis of agricultural capability classification.</p>	
<p>Water</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • Separated from urban services by distance and topography. • Located more than 3 miles from the nearest water main. • The nearest water transmission line is the 24" "Natron" water line, extended in 2013 to the SW corner of the school district property. The 16" line from Westwind/Linda Lane provides a looped system. • A planned 24" line will extend south from Weyerhaeuser Haul Rd. to serve the SE portion of the UGB. • Wallace Creek Rd. narrow, winding corridor alignment and topography preclude infrastructure extensions. Extension along Weyerhaeuser Haul Road alignment may be a possible alternative. • Separated by at-grade rail crossing at Jasper Rd/Wallace Creek Rd. • No developed system in vicinity
<p>Wastewater</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • No developed system in vicinity. • Wallace Creek Rd.'s narrow, winding corridor alignment and topography preclude infrastructure extensions. Extension along Weyerhaeuser Haul Road alignment may be a possible alternative to serve parcels in Haul Road area. • The Jasper Trunk sewer is 2-3 miles away. • It is anticipated one or two additional small pump stations may be needed to serve some portions of the area depending upon future development configuration and topography. • Jasper trunk sewer may not have adequate capacity to serve additional industrial uses, so a new parallel trunk may be necessary. • Separated by at-grade rail crossing at Jasper Rd/Wallace Creek Rd.

⁷⁰ See proposed Metro Plan Amendment for parcel numbers designated Urban Holding Area – Employment. Note other publicly owned lands in this area designated Public/Semi Public that the City added to the UGB to accommodate existing and planned SUB water treatment facilities and Willamalane parks.

	 <p>City of Springfield wastewater basin (shown in blue) and service main in relationship with Wallace Creek, South Hills, West Jasper Mahogany, and Jasper Bridge areas</p>
<p>Stormwater</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • Upgrade existing Wallace Creek outfall to Middle Fork Willamette River • No developed system in vicinity • Physical connections to the Middle Fork Willamette River system can be made with little or no impact on existing stormwater systems. • Development of the area will require land acquisition to safely convey stormwater runoff to the river if lands are not bordering Wallace Creek • New stormwater outfalls will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands. • Stormwater management through the use of on-site retention and/or infiltration would be challenging given the sloped topography and location relative to Springfield Utility Board’s Willamette well field. • The Middle Fork Willamette River is federally classified as critical salmonid habitat.
<p>Transportation (including transit service)</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Would require secondary access • Existing rail crossing at Jasper Rd/Wallace Creek Rd. is substandard. Upgrade would be needed. An at-grade crossing may not be feasible in this location. Existing traffic waiting to cross backs into Jasper Rd. 24 trains/day. • Wallace Creek Road will need improvement to urban standards. The existing narrow, winding alignment through sloped topography is a constraint. • DOGAMI SLIDO mapped landslide hazard area along Wallace Creek Road • Access via Jasper Rd., but urban standards and capacity improvements needed⁷¹: Improvement of the entire length of Jasper Road to urban standards and upgrade to 4 lanes to Main Street via South 42nd Street, including Union Pacific mainline crossing upgrades on South 42nd Street and intersection upgrades along the length of the entire corridor. • Topography limits expansion of Jasper Rd. portion of the narrow corridor next to the Willamette River • May trigger capacity improvements (4-lane section) for Bob Straub Parkway: Improvements to Bob Straub Parkway from Jasper Road to Daisy Street, upgrading

⁷¹ See Jasper Bridge exception area

	<p>to 4 lanes.</p> <ul style="list-style-type: none"> • Intersection improvements will be needed at Bob Straub Parkway and Daisy Street.⁷² • Jasper Rd. & Straub Parkway: “With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length.” • Intersection improvements will be needed at Bob Straub Parkway and Jasper Road, which will include a new traffic signal. • A new road connection from Bob Straub Parkway to Jasper Road will be needed in the vicinity of Tax Lot 1802090000103, which will include a new grade separated crossing over the railroad. • Connection to Hwy 58 but limited connection to Hwy 126/I-5 • “Need to further study capacity at the I-5/Hwy 58th interchange. Improvements may be needed depending on size and location of expansion area.”⁷³ • Nearest transit service is at Thurston Station on Main Street, >3 miles away.⁷⁴ No transit services, pedestrian facilities or ADA access in area. • “Main St/Straub Parkway intersection is failing today even with planned interchange improvements”, and there are safety issues with signal. Traffic would need to be distributed differently. Significant development would need to participate in funding of ODOT IAMP. Impacts to the OR126/Main St intersection should be considered. ODOT’s previous analysis indicate that the OR 126/Main St, Main St/54th St. and Main St/58th St all exceed capacity by 2031.”^{75, 76}
<p>Urban services conclusion: Wallace Creek Fourth Priority lands</p>	<p>The City excluded the Wallace Creek area from consideration because the area does not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses in this location. Providing service to the area will present significant challenges not only in the length of improvements, but also the multiple at grade railroad crossings that will likely be needed along Jasper Road and Wallace Creek Rd. In addition, Jasper Road will likely need to be upgraded to provide capacity for employment development. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extensions and upgrades of water, wastewater and transportation, services including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).</p>
<p>Seavey Loop</p>	
<p>The City excluded unconstrained lands comprising predominantly Class II, Class III High Value Farmland and Class</p>	

⁷² Project #R-44 is identified as a “Beyond 20-year Project” in the 2035 Springfield TSP

⁷³ Comments received from ODOT Region 2, Area 5 staff Savannah Crawford, email dated June 18, 2013.

⁷⁴ Email from LTD staff Will Mueller, dated June 28, 2013 provides comments describing the physical requirements necessary to provide transit service applicable to extending transit service to any new areas: “Connecting roadways and streets would need to be constructed to city standards that support LTD’s buses including sufficient lane width, intersection curb radii, and sidewalk width at prospective bus stops to meet ADA standards in effect at time of construction (2013 standards require 8’ sidewalks at bus stops).

⁷⁵ Comments received from ODOT staff Crawford, meeting on June 11, 2013 and email dated June 18, 2013.

⁷⁶ Interchange improvements at Main St/Hwy 126 and Highway 126 at 52nd are listed as financially constrained projects in the Regional Transportation Plan (RTP).

IV Prime soils on the basis of agricultural capability classification.

Water

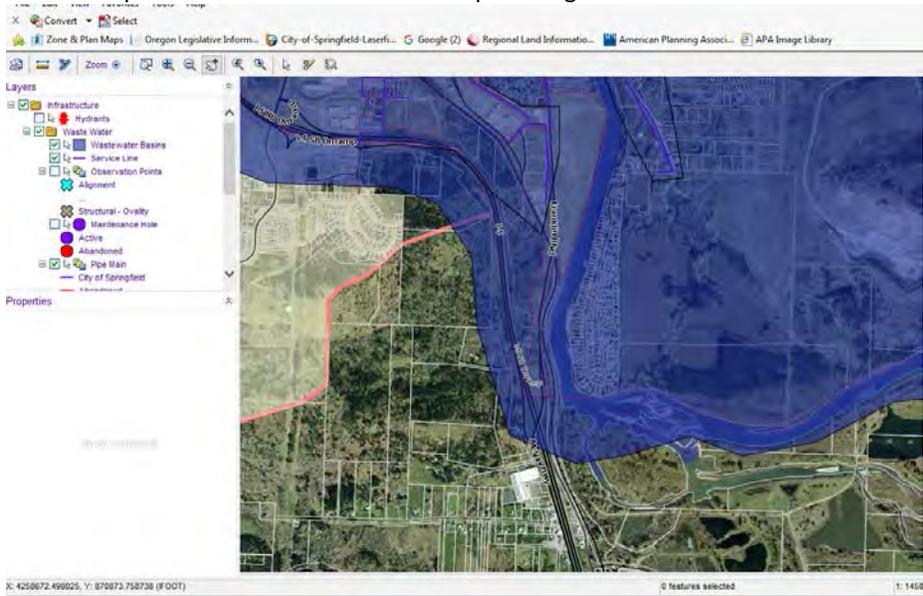
3 Medium Difficult

- Existing rural water system and service provided by Willamette Water Company
- Potentially suitable lands are located more than 2 miles from the nearest SUB water main, a 16" line in McVay

Wastewater

5 Difficult

- No developed system in vicinity
- Isolated by distance and topography from existing urban services
- Would require extension of a pressure main from the Franklin/McVay trunk 18" line in Glenwood, approximately 2 miles to the western boundary of the potentially suitable lands.
- Would require upgrades to existing Glenwood MWMC pump station.
- A new large sized wastewater pump station located near the intersection of Seavey Loop and Franklin Boulevard will be needed.
- Would require a new small sized wastewater pump station located in the vicinity of the intersection of 30th Avenue and College View Road.
- Would require a new wastewater gravity/pressure main extension from the new pump station at 30th Avenue and College View Road to a new pump station in the vicinity of the intersection of Seavey Loop and Franklin Boulevard, and a gravity main extension along College View Road southerly, ending near the intersection with Franklin Boulevard in order to serve existing properties.
- Would require a new small sized wastewater pump station located near the intersection of Franklin Boulevard and Twin Buttes Road.
- Would require a new small sized wastewater pump station located in the vicinity of Seavey Loop Road near the West property line of the Tax Lot 1803141000305.
- Wastewater service to this area could become feasible in the future beyond the planning period, however given its removed location from the rest of Springfield, and the number of new pump stations that will likely be needed to provide service, there would be long-term operational costs associated with providing this service.



The screenshot shows a GIS application interface with a map of the Springfield area. The map displays a blue-shaded region representing the wastewater basin, a red line for the service main, and various infrastructure features. The interface includes a 'Layers' panel on the left with categories like 'Infrastructure', 'Structural - Quality', and 'Properties'. The map shows a network of roads and water features, with the wastewater basin and service main highlighted in the study area.

City of Springfield wastewater basin (shown in blue)and service main in relationship with **Seavey Loop** study area

Stormwater

5 Difficult

	<ul style="list-style-type: none"> • Isolated by distance and topography from existing urban services • Physical connections to Oxley Slough and/or the Coast Fork Willamette River can be made with little or no impact on existing stormwater systems, although the connection locations may need to be outside of the proposed expansion area. • New stormwater outfalls to Oxley Slough and/or the Coast Fork Willamette River receiving waters will involve several other regulatory agencies because the work would affect riparian areas, excavation in the waters of the state and waters of the United States, and potential wetlands. • While the Coast Fork Willamette River is not federally classified as critical salmonid habitat, the State has designated the Coast Fork Willamette River as essential salmonid habitat. • Stormwater management through the use of on-site retention and/or infiltration may be allowable in this area as it is outside of the zone of contribution for Springfield Utility Board’s wells and no other wellhead protection zones have been identified to the City’s knowledge. • Considering the multiple overlapping regulatory jurisdictions for constructing new stormwater outfalls into the Coast Fork Willamette River and/or Oxley Slough, stormwater service for this area may be feasible if on-site stormwater management techniques that maximize stormwater retention and infiltration are required.
<p>Transportation (including transit service)</p>	<p>5 Difficult</p> <ul style="list-style-type: none"> • Proximate to I-5, but freeway access is indirect and limited by the awkward connection and limited capacity at Franklin and 30th Ave. interchange. Access to I-5 at south end of area is from beneath the freeway, via Highway 58/Goshen interchange. • Limited capacity at I-5/30th Street interchange. “Need to further study capacity at the I-5/30th Street interchange and the I-5/Hwy 58th interchange. Improvements at one or both locations may be needed depending on size and location of expansion area.”⁷⁷ • City staff identified a need for an Extension of 30th Avenue as a grade separated to the intersection with Franklin Boulevard and Seavey loop near the southeast corner of the EPUD property. This excludes I-5 interchange improvements or upgrades.⁷⁸ • City staff identified a need for the north end of Seavey Loop Rd. to be reconfigured to terminate South of Franklin Boulevard (North of EPUD). • Existing rail underpass at Franklin is very narrow and restricts truck passage. • Opportunities for rail access are unlikely, given the existing infrastructure configuration, lack of siding and narrow width and depth of parcels • Isolated from urban transportation system • May trigger capacity improvements for McVay Highway in Glenwood • Service to this area may be feasible, however there are expected to be some challenges surrounding the 30th Avenue extension and potential for interchange improvements at Interstate 5. • “Difficult to serve with transit except via one-directional route variation from current #92 Lowell/LCC route which only runs 3 trips per weekday.”⁷⁹ No pedestrian facilities or ADA access in area.
<p>Urban services</p>	<p>The City excluded the Seavey Loop Fourth Priority lands from consideration because</p>

⁷⁷ Comments received from ODOT Region 2, Area 5 staff Savannah Crawford, email dated June 18, 2013.

⁷⁸ At the College View Stakeholder Working Group meeting on March 4, 2015, ODOT staff David Helton stated that the existing 30th Ave. interchange would likely be sufficient to accommodate traffic from future development in the study area concept as mapped on that date.

⁷⁹ Comments from meeting with Lane Transit District staff Evans, Schwetz, Luftig and ODOT staff Crawford, June 11, 2013.

<p>conclusion: Seavey Loop Fourth Priority lands</p>	<p>these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services extensions and upgrades necessary to serve urban employment uses within the planning period. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield’s identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).</p>
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IDENTIFY FOURTH PRIORITY LANDS WITH THE SPECIFIED CHARACTERISTICS TO MEET THE IDENTIFIED EMPLOYMENT LAND NEED TO INCLUDE IN THE UGB

The City conducted a public facilities and services analysis to determine whether the *potentially* suitable land identified in the previous step could reasonably be provided with the public water, sewer, stormwater and transportation facilities needed to serve industrial and commercial mixed use employment uses within the 2010-2030 planning period and thus be considered suitable candidate lands to accommodate the identified employment land need deficiency determined under OAR 660-024-0050.

As previously explained in this report for land to be “suitable” for industrial and other employment use under OAR 660-009-0005(12) it must be “serviceable.” OAR 660-009-0005(9) states that “‘Serviceable’ means a city or county has determined that public facilities and transportation facilities, as defined by OAR chapter 660, division 11 and division 12, currently have adequate capacity for development planned in the service area where the site is located or can be upgraded to have adequate capacity within the 20-year planning period.”

As previously explained in this report Goal 11 requires public facilities to be planned to support types and levels of urban facilities and services appropriate for Springfield’s needs and requirements, consistent with the comprehensive plan. Springfield’s need is for the types and levels of public facilities and services appropriate and necessary to support the needs of urban industrial and commercial uses generally and manufacturing and office employment sites specifically.⁸⁰ Goal 11 requires public facilities and services to be provided “*in a timely, orderly and efficient arrangement.*” Goal 14 requires cities to evaluate changes to their UGB considering “*orderly and economic provision of public facilities and services.*”

As previously explained in this report requirements under OAR chapter 660, division must be considered at this stage in the UGB Alternatives Analysis to ensure that the amendment of the comprehensive plan to add urbanizable lands to the UGB is supported by adequate planned transportation facilities in a manner that is consistent with applicable transportation planning

⁸⁰ Springfield’s Target Industries are listed and explained in detail in the CIBL/EOA.

requirements in OAR chapter 660, division 12. The City is expanding the UGB to designate suitable land for industrial and commercial development, therefore suitable candidate lands added to the UGB must provide for the relevant transportation needs: movement of goods and services to support industrial and commercial development planned for pursuant to OAR chapter 660, division 9 and Goal 9 (Economic Development);[OAR 660-012-0030 (1)(c)] and movement of workforce employees to and from the workplace, including needs of the transportation disadvantaged.

Just as the TSP must “evaluate potential impacts of system alternatives that can reasonably be expected to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology;”[OAR 660-012-0035] the City’s UGB study carefully examined and compared alternative candidate growth areas to determine which alternative(s) can reasonably be expected to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology.”

The transportation system must “support urban development by providing types and levels of transportation facilities and services appropriate to serve the land uses identified in the acknowledged comprehensive plan.” [OAR 660-012-0035(3)(a)]. The City is expanding the UGB to designate suitable land for industrial and commercial development, therefore suitable candidate lands added to the UGB must be located where the relevant transportation needs can be provided: movement of goods and services to support the industrial and commercial employment development planned for pursuant to OAR chapter 660, division 9 and Goal 9 (Economic Development), and movement of workforce employees to and from the workplace, including needs of the transportation disadvantaged. [OAR 660-012-0030(1)(b)]

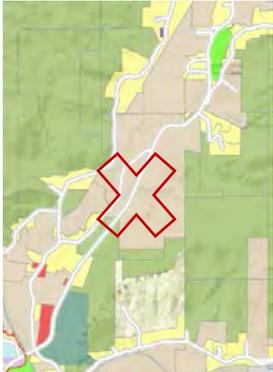
The City evaluated alternative candidate lands to consider the advantages and disadvantages of moving goods and service, workforce employees, including needs of the transportation disadvantaged via the existing and planned transportation system to minimize adverse economic, social, environmental and energy consequences. [OAR 660-012-0035(3)(c)]. The City accomplished this by measuring and comparing distance to candidate sites via existing and planned routes.

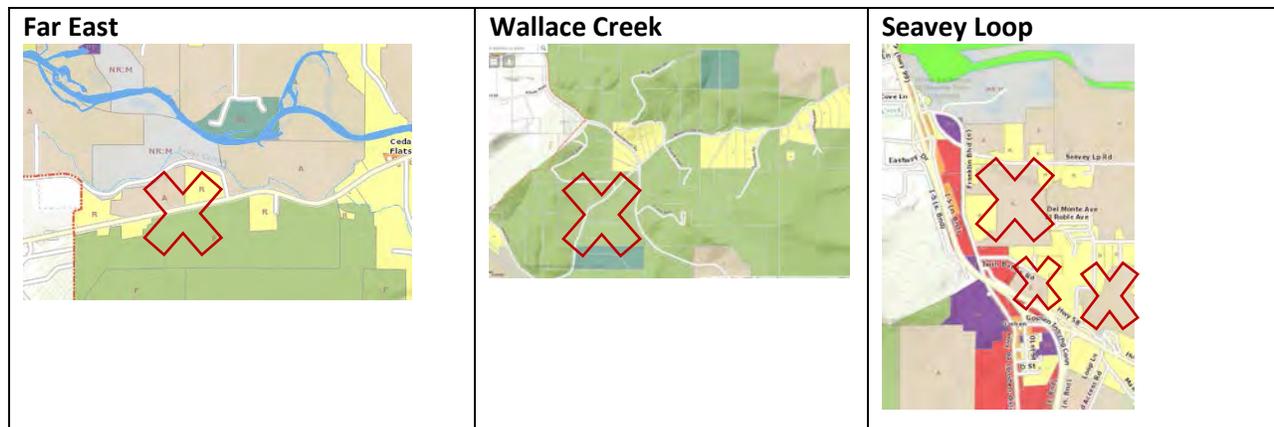
To address OAR 660-012-0005 (41) “*Vehicle Miles of Travel (VMT)*”, the City considered the VMT advantages and disadvantages of moving goods and service, workforce employees, including needs of the transportation disadvantaged via the existing and planned transportation system [OAR 660-012-0005(41)]when it evaluated alternative candidate lands. The City accomplished this by measuring and compared distance to candidate sites via existing and planned routes, assuming build out of the planned system. This is germane to the evaluation of serviceability because urban transit service is required for a city of Springfield’s size, to ensure that new jobs can be accessible to that transportation disadvantaged and as an important means to reducing VMT. Thus, ability to reasonably provide public transit service to new urban areas is a critical and necessary component of serviceability in this case. The City, in consultation with Lane Transit District staff, considered whether extending public transit service to candidate expansion areas can reasonably be expected to be feasible to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology.

Table 18: Fourth priority land excluded based upon specific land needs [ORS 197.298(3)(a)]

<p>Far East</p> 	<p>West Jasper/Mahogany</p> 	<p>Clearwater</p> 
<p>South Hills</p> 	<p>Wallace Creek</p> 	

Table 19: Fourth priority land excluded: public facilities constraints [ORS 197.298(3)(b)]

<p>McKenzie View</p> 	<p>Mohawk</p> 	<p>Oxbow/Camp Creek</p> 
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ORS 197.298 (1)(b) Goal 14 Location Factor 3 and Factor 4 – Fourth Priority Lands Analysis

To continue its evaluation of *potentially* suitable land sites to satisfy the employment land need deficiency, the City applied Goal 14 Factor 3 to evaluate the **North Gateway, McKenzie View, Mohawk, Oxbow/Camp Creek, North Springfield Highway, Far East, West Jasper/Mahogany, Clearwater, Wallace Creek, Mill Race and Seavey Loop** areas based on comparative ESEE consequences (Goal 14, Boundary Location, Factor 3), and based on compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4).

As previously noted, DLCD staff Gordon Howard provided an outline of the steps to be followed to exclude or include land:

- Exclude lands that are not buildable⁸¹
- Exclude lands based upon specific land needs (197.298(3)(a));
- Exclude lands based upon inability to reasonably provide urban services due to physical constraints (197.298(3)(b));
- Include lower priority lands needed to include or provide services to urban reserve lands (197.298(3)(c));
- **Exclude lands based upon analysis of comparative ESEE consequences (Goal 14, Boundary Location, Factor 3);**
- **Exclude lands based upon analysis of compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4)**

The City addressed Goal 14 Location Factor 3 as part of the ORS 197.298 evaluation process after making a determination of which fourth priority lands were potentially suitable based on parcel size size and lack of constraints, and after identifying potentially suitable parcels within a given geographic area

⁸¹ “Buildable” is a Goal 10 term. It is the City’s position that OAR 660-024-0060 (1) requires the City to consider whether sites are “suitable” at this “buildable” stage in the evaluation process.

grouping that could reasonably be serviceable by 2030. Goal 14 Location Factor 3 requires the City to make a determination that fourth priority parcels of land selected to be included in an urban growth boundary (UGB) will result in better environmental, social, energy, and economic (ESEE) consequences than the other lands of equal priority considered in this step and other alternative sites that were considered for inclusion and rejected. Under a Goal 14 Factor 3 analysis regarding public facilities and services, a local government may consider relative difficulty and cost differences between urbanizing alternative sites and may consider whether the amount of potentially suitable land within a geographic area could reasonably justify the extension of public infrastructure.

EVALUATE FOURTH PRIORITY LAND HAVING THE SPECIFIED CHARACTERISTICS TO MEET THE IDENTIFIED EMPLOYMENT LAND NEED

In the next step the City applied Goal 14, Boundary Location, Factor 3 and 4 to compare fourth priority lands under ORS 197.298.

- Exclude lands based upon analysis of comparative ESEE consequences (Goal 14, Boundary Location, Factor 3);
- Exclude lands based upon analysis of compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4)

Goal 14, Boundary Location, Factor 3 ESEE Consequences

In addition to information comparing ESEE consequences in the preceding sections of this report, the following section provides additional evidence and findings to address and compare the ESEE consequences of expanding the UGB to include alternative candidate lands. This section of the report explains how the City compared the ESEE consequences of urbanizing potentially suitable and serviceable candidate lands. The City reasoned that the following topics and facts are relevant to its comparative evaluation of candidate lands. Since relevant topics address multiple Environmental, Economic, Social and Energy consequence, ESEE consequences are addressed by topic.

Geologic Hazards

As previously stated, given that several of the UGB Preliminary Study Area groupings examined by the City are within, surrounded by or are accessible only by lands with steeply sloped topography, the City referenced data in the Oregon Department of Geology and Mineral Industries (DOGAMI) online interactive geohazard map to identify areas where landslide hazards have been documented. The City considered the DOGAMI SLIDO data for the purposes of informing subsequent steps in the analysis: 1) determination of suitability of land for urban growth including but not limited to physical factors involved when developing sites 5 acres and larger to accommodate specific types of industrial and commercial employment land uses to meet Springfield's employment land needs; and 2) examination and comparison of the ESEE consequences of urbanizing lands within the each priority category. As previously stated, the City's review of The DOGAMI SLIDO map data identified the presence of

documented landslide hazards and relatively higher landslide susceptibility including Very High, High, and Moderate in the vicinity of UGB Preliminary Study Area groupings: McKenzie View A, B, Mohawk A, B and C, Oxbow/ Camp Creek, Far East, South Hills, Wallace Creek and Seavey Loop B and C and Seavey Loop/Goshen. There exists an increased likelihood that mapped hazard locations will have landslides in the future compared to areas without mapped hazards.

The City's review of The DOGAMI SLIDO map data identified no documented landslide hazards or relatively lower landslide susceptibility (Low to Moderate) in the UGB Preliminary Study Areas Jasper Bridge A and B, West Jasper/Mahogany, Clearwater, Mill Race, and North Gateway. North Springfield Highway study area grouping has one mapped historically active landslide and low to moderate landslide susceptibility.

The presence of landslide hazards influence future urbanization patterns by potentially increasing risk to public health, safety and welfare both onsite and offsite of the parcels of land being developed and/or by imposing constraints that could preclude development or contribute to the infeasibility of developing a particular site to accommodate the types of particular industrial and other employment uses identified in the CIBL/EOA. Although the City did not identify the presence of landslide hazards as an absolute development constraint for the purposes of the Commercial and Industrial Lands Inventory, the City considered areas with known landslide hazards as comparatively less "suitable" to meet the need for large site industrial and commercial mixed use employment site needs when it determined suitability of land for urban growth including but not limited to physically developing sites 5 acres and larger to accommodate specific types of industrial and commercial employment land uses to meet Springfield's employment land needs; and when it examined and compared the ESEE consequences of urbanizing lands with or without known landslide hazards within the second priority category.

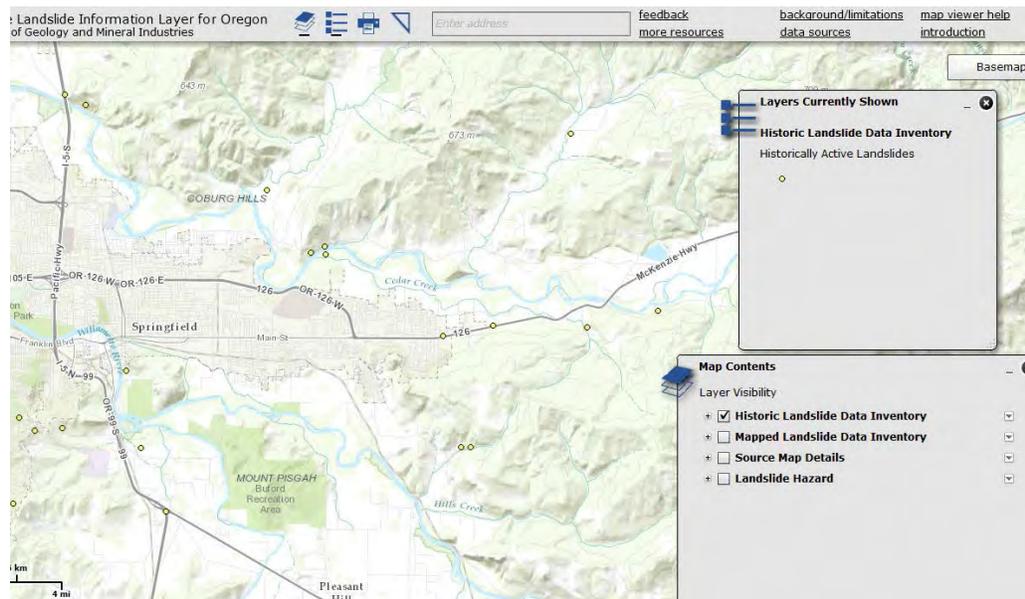
The intensification of development associated with urbanization would require site grading and excavation to construct large site urban employment uses and to extend the infrastructure needed to serve development. Such grading and excavation may not be physically or economically feasible or advisable in areas of known instability, and such site development may not be achievable under the standards of the City's Development Code Hillside Development District.⁸²

For purposes of the ESEE social and economic comparison, the City finds that when urbanization and development occurs in hillside areas with terrain known to be landslide-susceptible, greater losses are likely to result than when urbanization and development occurs in areas with terrain not known to be landslide-susceptible.

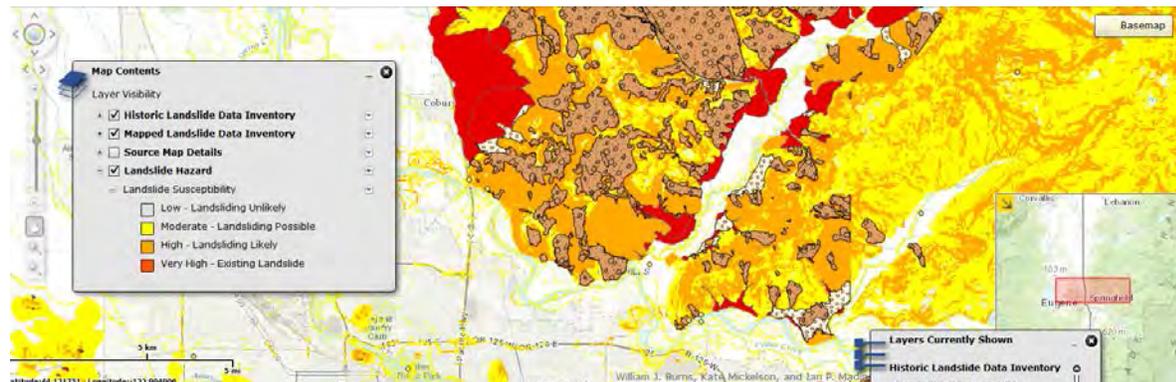
For purposes of the ESEE economic consequences comparison, the City finds that urbanization and development occur in hillside areas with terrain known to be landslide-susceptible will be more costly to

⁸² Springfield Development Code Section 3.3-500 Hillside Development Overlay District is applied in residential zoning districts above 670 feet elevation or to development areas below 670 feet in elevation where any portion of the development area exceeds 15 percent slope. Development standards address special street grade and grading plan standards, and geotechnical report requirements to address geological conditions of the site.

meet more rigorous engineering, architectural and construction requirements than urbanization and development outside of areas with terrain not known to be landslide-susceptible.



DOGAMI SLIDO maps⁸³ of the Coburg Hills area indicate the presence of existing and historic landslides throughout the Coburg Hills, north of Springfield and the McKenzie River. For example, as shown in the following detail from the map, the hills are generally mapped with landslide hazards susceptibility ratings of “Very high – existing landslide,” “High - landsliding likely,” and “Moderate – landsliding possible.”

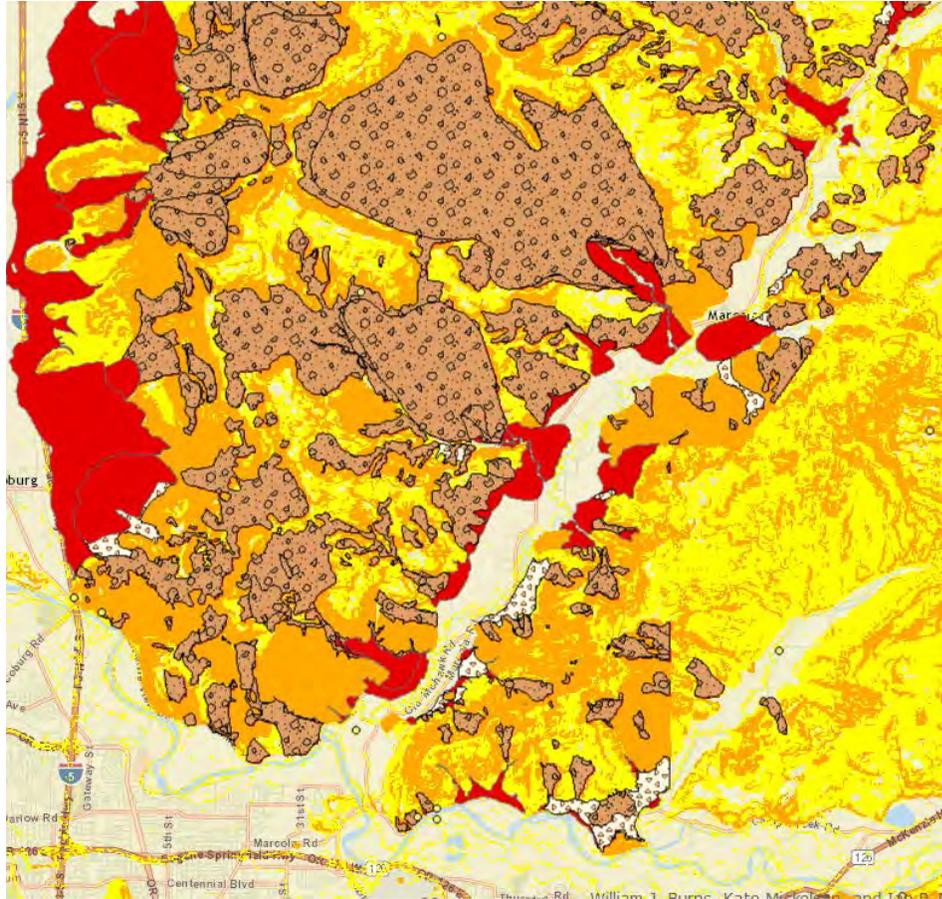


DOGAMI SLIDO Coburg Hills landslide hazard area: **McKenzie View B, Mohawk A, B and C and Oxbow/ Camp Creek Preliminary Study Area groupings**

⁸³ DOGAMI SLIDO viewer, <http://www.oregongeology.org/sub/slido/>

The website states: “Although the data have been processed successfully on a computer system at the Oregon Department of Geology and Mineral Industries (DOGAMI), no warranty expressed or implied is made regarding the accuracy or utility of the data on any other system or for general or scientific purposes, nor shall the act of distribution constitute any such warranty. This disclaimer applies both to individual use of the data and aggregate use with other data. We also urge you to pay careful attention to the contents of the metadata with these data and to the compilation process and limitations described therein. The Oregon Department of Geology and Mineral Industries shall not be held liable for improper or incorrect use of the data described and/or contained herein. Data are not intended for site-specific investigations.”

DOGAMI SLIDO maps⁸⁴ of the Coburg Hills area indicate the presence of landslide hazards in the near vicinity of the **McKenzie View A, B, Mohawk A, B and C** and **Oxbow/ Camp Creek** Preliminary Study Area groupings and adjacent resource lands.

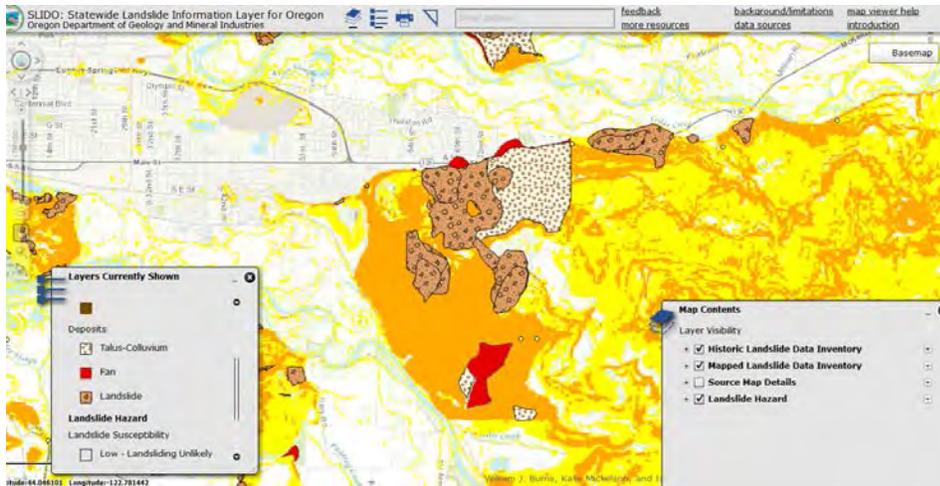


Detail: DOGAMI SLIDO McKenzie View A, B; Mohawk A, B and C; and Oxbow/Camp Creek areas

DOGAMI SLIDO maps⁸⁵ of the South Hills area indicate the presence of high landslide hazards and landslides in the near vicinity of the **Wallace Creek** Preliminary Study Area grouping.

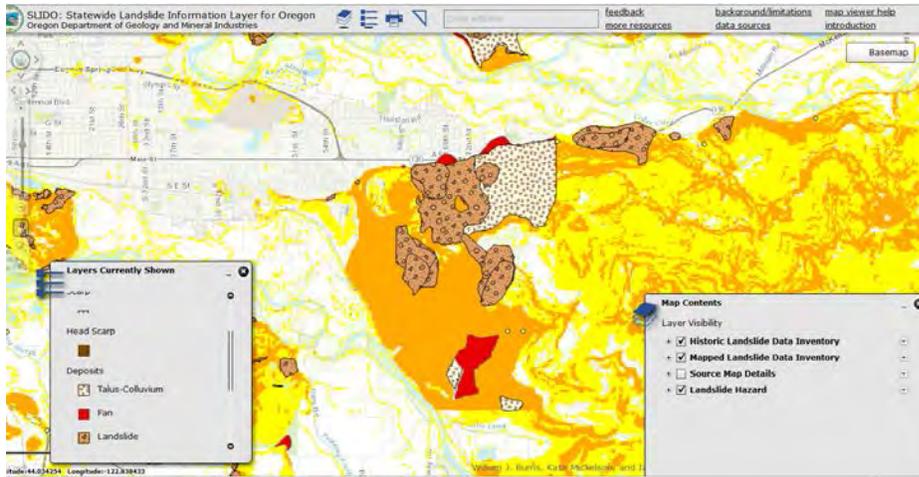
⁸⁴ Ibid.

⁸⁵ Ibid.

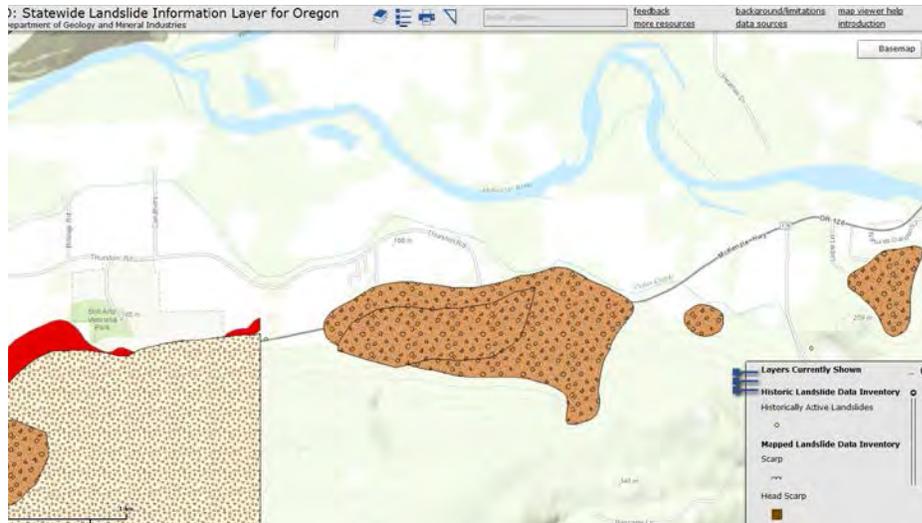


Detail DOGAMI SLIDO Wallace Creek landslide hazard area

DOGAMI SLIDO maps⁸⁶ of the South Hills area indicate the presence of landslide hazards in the near vicinity of the **Far East Springfield** and **South Hills Preliminary Study Area** groupings



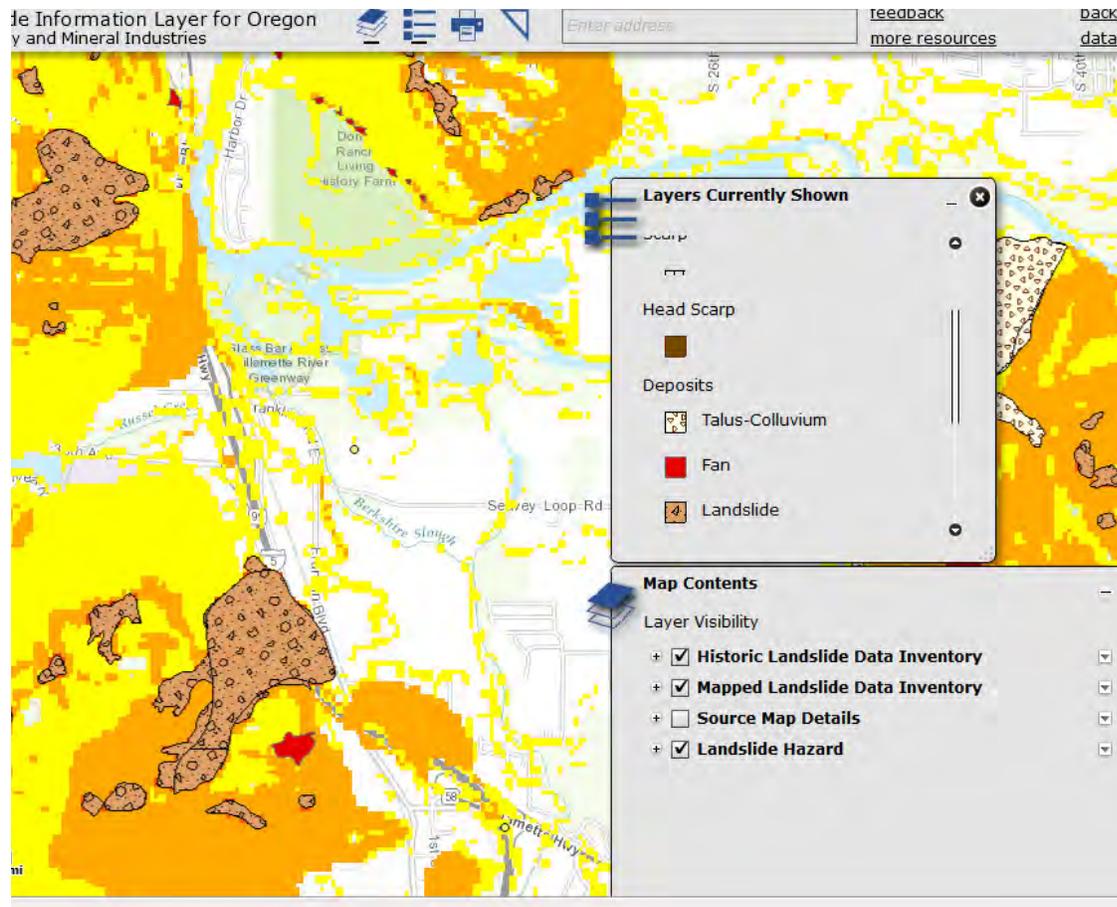
⁸⁶ Ibid.



Detail: DOGAMI SLIDO **Far East** landslide hazard area

DOGAMI SLIDO maps⁸⁷ of the area southwest of the UGB indicate the presence of landslide hazards in the near vicinity of the **Seavey Loop B and C Exception Area** Preliminary Study Area groupings and adjacent resource lands.

⁸⁷ Ibid.



DOGAMI SLIDO Seavey Loop B and C mapped landslide hazard areas

The City applied the following criteria when it evaluated and compared transportation related impacts and ESEE consequences of urbanizing alternative locations. The City reasoned that the following criteria and facts are relevant to its comparative evaluation of candidate lands:

Transportation Impacts Related to Distance from City and Major Transportation Facilities

Location of area causes conflicts with State Planning Goals and local plan policies related to maintaining efficient, compact urban form by causing comparatively substantial additional vehicle miles travelled to and from new employment center land uses.

Location and physical constraints of area causes conflicts with Federal, State or Local policies regarding safety or performance standards of the transportation system, including freight mobility, roadway, transit, bicycle and pedestrian facilities.

A more distant location of an area from urban infrastructure and services results in a stronger likelihood that urbanization will not be provided with inadequate emergency access.

A location requiring a river crossing results in a stronger likelihood that urbanization will not be provided with inadequate emergency access.

A development project that results in vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact.

Generally, development projects that locate within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor may be presumed to cause a less than significant transportation impact. Similarly, development projects that decrease vehicle miles traveled in the project area compared to existing conditions may be considered to have a less than significant transportation impact.

Vehicle miles traveled is an appropriate metric to evaluate a project's transportation impacts.

Comparative assessment of ESEE impacts associated with certain transportation projects must address the potential for induced travel. Adding additional lane miles to serve more distant areas may induce increased automobile and truck travel, and vehicle miles traveled, compared to existing conditions, and may be presumed to cause transportation environmental impacts.

Transportation projects that reduce, or have no impact on, vehicle miles traveled may be presumed to cause a less significant transportation environmental impact.

If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations (such as homes, employment and services), area demographics, etc.

For the purposes of the UGB Alternatives Analysis, the City assumed that the target industrial and other employment uses requiring sites 5 acres and larger — as identified in the EOA — would induce travel and transportation-related impacts similar to the travel and impacts of existing industrial and other employment uses in Springfield — such as the employment sectors located in the International Way Campus Industrial district.

For the purposes of the UGB Alternatives Analysis, the City assumed that adding or improving additional lane miles to serve more distant areas may induce increased automobile and truck travel, and vehicle miles traveled, compared to existing conditions, and may be presumed to cause transportation environmental impacts relative to trip length, as identified in the City's Public Facilities Analysis.

ESEE Environmental/Air Quality/Energy Consequences

Accounting for vehicle miles traveled (VMT) is a measure used in connection with long range planning, or as part of the analysis of a project's greenhouse gas emissions or energy impacts. Methods of some estimating vehicle miles traveled include: ⁸⁸

*“**Trip-based assessment** of a project's effect on travel behavior counts VMT from individual trips to and from the project. It is the most basic, and traditionally most common, method of counting VMT. A **tour-based assessment** counts the entire home-back-to-home tour that includes the project.*

Both trip- and tour-based assessments can be used as measures of transportation efficiency, using denominators such as per capita, per employee, or per person-trip. ...a tour-based assessment of VMT is a more complete characterization of a project's effect on VMT. In many cases, a project affects travel behavior beyond the first destination. The location and characteristics of the home and workplace will often be the main drivers of VMT. For example, a residential or office development located near high quality transit will likely lead to some commute trips utilizing transit, affecting mode choice on the rest of the tour.

Characteristics of an office project can also affect an employee's VMT even beyond the work tour. For example, a workplace located at the urban periphery, far from transit, can cause an employee to need to own a car, which in turn affects the entirety of an employee's travel behavior and VMT. For this reason, when estimating the effect of an office development on VMT, it may be appropriate to consider total employee VMT.”(emphasis added)

Based on this reasoning and for the purposes of this ESEE analysis, the City assumed that the more distant the exception area is located from the City, the greater the distance the potential urban employment site/workplace will located from the City and from transit. This greater distance is more likely to cause an employee to need to own a car, which in turn affects the entirety of an employee's travel behavior and VMT.

Urbanizing areas more distant from the City, will result in relative increases in VMT and transportation impacts within the existing UGB as more employees need to own a car to reach their more distant workplaces.

Designating land for employment centers within or proximate to multimodal transportation networks will have the consequence of adding new users to systems. This can cause mixed cumulative impacts:

“When evaluating impacts to multimodal transportation networks, lead agencies generally should not treat the addition of new users as an adverse impact. Any travel-

⁸⁸ “Technical Advisory of Evaluating Transportation Impacts in CEQA,” California Governor's Office of Planning and Research, Jan. 20, 2016, pp. 13-14.

efficient infill development is likely to add riders to transit systems, potentially slowing transit vehicle mobility, but also potentially improving overall destination proximity. Meanwhile, such development improves regional vehicle flow generally by loading less vehicle travel onto the regional network than if that development was to occur elsewhere.”⁸⁹

“Increased demand throughout a region may, however, cause a cumulative impact by requiring new or additional transit infrastructure. Such impacts may be best addressed through a fee program that fairly allocates the cost of improvements not just to projects that happen to locate near transit, but rather across a region to all projects that impose burdens on the entire transportation system.”⁹⁰

“Projects that would likely lead to an increase in VMT, (including for purposes of accurately estimating GHG and other impacts that are affected by VMT), generally include:

- *Addition of through lanes on existing or new highways, including general purpose lanes, HOV lanes, peak period lanes, auxiliary lanes, and lanes through grade-separated interchanges.”*

Projects that would not likely lead to a substantial or measureable increase in VMT, generally include:

- *Rehabilitation, maintenance, replacement and repair projects designed to improve the condition of existing transportation assets (e.g., highways, roadways, bridges, culverts, tunnels, transit systems, and assets that serve bicycle and pedestrian facilities) and that do not add additional motor vehicle lanes.*
- *Roadway shoulder enhancements to provide “breakdown space,” otherwise improve safety or provide bicycle access.*
- *Addition of an auxiliary lane of less than one mile in length designed to improve roadway safety.*
- *Installation, removal, or reconfiguration of traffic lanes that are not for through traffic, such as left, right, and U-turn pockets, or emergency breakdown lanes that are not utilized as through lanes.*
- *Addition of roadway capacity on local or collector streets provided the project also substantially improves conditions for pedestrians, cyclists, and, if applicable, transit*
- *Conversion of existing general purpose lanes (including ramps) to managed lanes or transit lanes, or changing lane management in a manner that would not substantially decrease impedance to use*
- *Reduction in number of through lanes, e.g. a “road diet”*
- *Grade separation to separate vehicles from rail, transit, pedestrians or bicycles, or to replace a lane in order to separate preferential vehicles (e.g. HOV, HOT, or trucks) from general vehicles*

⁸⁹ Ibid. p. 26.

⁹⁰ “Technical Advisory of Evaluating Transportation Impacts in CEQA,” California Governor’s Office of Planning and Research, Jan. 20, 2016

- *Installation, removal, or reconfiguration of traffic control devices, including Transit Signal Priority (TSP) features*
- *Traffic metering systems*
- *Timing of signals to optimize vehicle, bicycle or pedestrian flow*
- *Installation of roundabouts*
- *Installation or reconfiguration of traffic calming devices*
- *Adoption of or increase in tolls*
- *Addition of tolled lanes, where tolls are sufficient to mitigate VMT increase (e.g., encourage carpooling, fund transit enhancements like bus rapid transit or passenger rail in the tolled corridor)*
- *Initiation of new transit service*
- *Conversion of streets from one-way to two-way operation with no net increase in number of traffic lanes*
- *Removal of off-street parking spaces*
- *Adoption or modification of on-street parking or loading restrictions (including meters, time limits, accessible spaces, and preferential/reserved parking permit programs).*
- *Addition of traffic wayfinding signage*
- *Rehabilitation and maintenance projects that do not add motor vehicle capacity*
- *Any lane addition under 0.3 miles in length, including addition of any auxiliary lane less than 0.3 miles in length”⁹¹*

Causes of Induced VMT. Induced VMT occurs where roadway capacity is expanded in a congested area, leading to an initial appreciable reduction in travel time. With lower travel times, the modified facility becomes more attractive to travelers, resulting in the following trip-making changes, which have implications for total VMT:

- *Longer trips. The ability to travel a long distance in a shorter time increases the attractiveness of destinations that are further away, increasing trip length and VMT.*
- *Changes in mode choice. When transportation investments are devoted to reducing automobile travel time, travelers tend to shift toward automobile use from other modes, which increases VMT.*
- *Route changes. Faster travel times on a route attract more drivers to that route from other routes, which can increase or decrease VMT depending on whether it shortens or lengthens trips.*
- *Newly generated trips. Increasing travel speeds can induce additional trips, which increases VMT. For example, an individual who previously telecommuted or purchased goods on the internet might choose to accomplish those ends via automobile trips as a result of increased speeds.*
- *Land Use Changes. Faster travel times along a corridor lead to land development further along that corridor; that development generates and attracts longer trips, which increases VMT. Over several years, this component of induced VMT can be substantial, e.g. approximately half of the total effect on VMT.*

These effects operate over different time scales. For example, changes in mode choice might occur immediately, while land use changes typically take a few years or longer.”⁹²

⁹¹ Ibid.

⁹² Ibid

ESEE Energy Consequences

“Targets to reduce existing VMT to curb greenhouse gases, and other pollutants do not translate directly into VMT thresholds for individual projects for numerous reasons, however, including the following:

Some, though not all, of the emissions reductions needed to achieve those targets will be accomplished by other measures, including increased vehicle efficiency and decreased fuel carbon content.

New projects alone will not sufficiently reduce VMT to achieve those targets, nor are they expected to be the sole source of VMT reduction.

Interactions between land use projects, and also between land use and transportation projects, existing and future, together affect VMT.”⁹³

Because regional location is the most important determinant of VMT, locating vehicular trip-inducing urban land uses in travel efficient locations is widely recognized as one effective means of reducing VMT, and thus reducing energy consumption associated with transportation. Based on this accepted fact, it is reasonable for the City to assume that the more remote the location from Springfield, the higher the VMT associated with development would result. For the purposes of the UGB Alternatives Analysis, the City assumed locations farther from Springfield — as identified by relative trip length in the City’s Public Facilities Analysis — would result in increased VMT and increase in impacts associated with VMT compared to areas closer to Springfield.

The relative proximity of the North Gateway and Mill Race sites to the region’s existing and planned public frequent transit network system is the basis for the City’s assumption that those two locations provide travel-efficient locations relative to the other alternatives studied and thus would result in comparatively higher percentage of commute trips by transit and fewer vehicular commute trips to employment centers.

ESEE Economic Consequences

OAR 660-009-0005 (3) states:

““Industrial Use” means employment activities generating income from the production, handling or distribution of goods. Industrial uses include, but are not limited to: manufacturing; assembly; fabrication; processing; storage; logistics; warehousing; importation; distribution and transshipment; and research and development. Industrial uses may have unique land, infrastructure, energy, and transportation requirements. Industrial uses may have external impacts on surrounding uses and may cluster in traditional or new industrial areas where they are segregated from other non-industrial activities.” (emphasis added)

⁹³ Ibid.

The Goal 9 rule's definition of "industrial" clearly recognizes that "Industrial uses may have external impacts on surrounding uses;" and that industrial uses typically and traditionally may locate in locations where other industrial activities are occurring.

The City's description of candidate study areas identifies the land uses surrounding each candidate area.

For the purposes of the UGB Alternatives Analysis, the City assumed that candidate study areas sharing boundaries with lands designated, zoned and developed with urban industrial and other employment uses have comparative economic advantages over areas that do not share boundaries with lands designated, zoned and developed with urban industrial and other employment uses, because aggregating employment uses results in greater efficiencies in infrastructure, services and transportation. [OAR 660-009-0005 (3)] The North Gateway and Mill Race sites abut industrial lands inside the UGB.

As previously stated, increased distance from Springfield increases the public costs to construct maintain and operate infrastructure and services. Developing sites closer to Springfield decreases the public costs to construct maintain and operate infrastructure and services.

As previously stated, increased distance from Springfield increases travel times for transporting goods and services, and employee travel time, resulting in relatively higher cost to businesses and employees.

Social Consequences Comparison

The majority of second priority exception lands in the vicinity of the UGB are designated and zoned for and developed with rural residential uses, thus exception land parcel(s) are already developed and committed to rural uses, primarily rural residential uses.

Expanding the UGB to include any of the exception areas studied would encompass lands designated and zoned for and developed with rural residential uses that lack the characteristics of needed employment sites.

When exceptions areas were designated by Lane County in the Lane Rural Comprehensive Plan, and zoned Rural Residential, those lands were committed to rural uses in accord with the administrative rules in Division 4 interpreting the Goal 2 exception process in effect at the time they were designated. As stated in OAR 660-004-0010, *"The exceptions process is generally applicable to all or part of those statewide goals that prescribe or restrict certain uses of resource land, restrict urban uses on rural land, or limit the provision of certain public facilities and services."*

Including developed Rural Residential exception or marginal lands nthe UGB that are not suitable to accommodate Springfield's needed industrial and commercial mixed use employment uses on large sites 5 acres or larger and 20 acres or larger, would make those lands "urbanizable." The City would be required to redesignate and rezone rural residential lands for employment use. In many, but not all circumstances in the study area, this would come at a greater social cost and would be more likely to

result in land use conflicts between existing rural residential uses and industrial and commercial mixed use employment uses.⁹⁴

If the City were to expand the UGB to include Third or Fourth priority resource lands in remote locations from Springfield, unsuitable intervening resource, exception and marginal rural lands remaining outside the UGB would likely be affected by the siting of urban industrial and commercial uses. Industrial and commercial uses are not typically considered compatible with residential uses, and land use buffers would typically be required, reducing the overall developable acreage of a site. In many, but not all circumstances in the study area, this would come at a greater social cost and would be more likely to result in land use conflicts between existing rural residential uses and industrial and commercial mixed use employment uses.

Goal 14 Location Factor 3 Conclusions – Fourth Priority Lands Analysis

The City's analysis of comparative ESEE consequences (Goal 14, Boundary Location, Factor 3) confirmed exclusion of lands in the previous steps:

- **This step confirmed exclusion of McKenzie View land** (cost, remote, contrary to compact urban development, no transit, landslide hazards, farmland)
- **This step confirmed exclusion of Oxbow/Camp Creek** (cost, remote, contrary to compact urban development, no transit, landslide hazards, farmland)
- **This step confirmed exclusion of Mohawk** (cost inhibitive infrastructure upgrades to cross river, distance, unsuitable location, remote, contrary to compact urban development, no transit, landslide hazards, farmland)
- **This step confirmed exclusion of North Springfield Highway** (environmental, flooding, stormwater discharge regulations, habitat)
- **This step confirmed exclusion of West Jasper/Mahogany (cost/benefit, cost inhibitive infrastructure upgrades, no transit, environmental, habitat, social, farmland)**
- **This step confirmed exclusion of Clearwater** (no transit, social, farmland)
- **This step confirmed exclusion of Wallace Creek lands on the basis of** (cost/benefit, landslide hazards, cost inhibitive infrastructure upgrades, contrary to compact urban development, no transit)
- This step confirmed exclusion of **Far East** (cost/benefit, cost inhibitive infrastructure upgrades, farmland, contrary to compact urban development, no transit, landslide hazards)
- This step confirmed exclusion of **Seavey Loop** (contrary to compact urban development, cost inhibitive infrastructure upgrades, cost/benefit, social, farmland)

The City determined that the cost to serve potentially suitable lands within these areas is not feasible within the planning period.

⁹⁴ See the record at X documenting input from Seavey Loop neighbors regarding the City's consideration of the College View study area

The City determined that these areas cannot reasonably be served with adequate public facilities by 2030 and thus are not suitable to meet the identified employment land need.

The City finds that the long-term environmental, economic, social and energy consequences resulting from the use at these site with measures designed to reduce adverse impacts are significantly more adverse than would typically result from the same proposal being located in other areas.

Goal 14 Factor 4: Compatibility of proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB

Goal 14 Factor requires the City to address how development of urban industrial and commercial employment uses within the UGB expansion area would be compatible with nearby agricultural and forest activities occurring on farm and forest land outside the UGB. Given that ORS 197.298 requires the City to site urban uses on farmland as the fourth priority, and given that the City has no suitable Second or Third Priority lands to accommodate the employment land need, the City must meet a high bar to demonstrate that the farmland it chose to include in the UGB expansion was carefully and thoughtfully selected after a thorough comparison of all alternative areas within the same priority to consider how future urbanization to accommodate target industry employment uses would be compatible/incompatible with nearby agricultural and forest activities occurring on farm and forest land outside the UGB.

The City reasoned that the following facts are relevant to the Factor 4 comparison because maintaining a compact urban form reduces opportunities for land use conflicts between urban industrial and commercial employment uses and agricultural and forest activities.

The North Gateway and Mill Race suitable employment lands are contiguous with the Springfield City limits. Expanding the UGB on land contiguous to the City will result in a more compact, efficient urban form with relatively less potential for conflict with surrounding agricultural and forest activities occurring on farm and forest land outside the UGB than would result from expanding in alternative sites. Compact, efficient urban form is consistent with Metro Plan policy and Oregon law and Goal 14 Factors 1 and 2.

The result of expanding onto more distant and non-contiguous lands would a “leapfrogging” development pattern over, past or through unsuitable agricultural or forest land, inducing addition or expansion of urban corridors through the rural Lane County landscape. The purpose of a UGB is to separate urbanizable from rural land. Establishment of corridors to serve distant development creates or increases edge effects. Edges, where they occur along and though farm or forest land areas, inherently create or increase physical opportunities for land use conflicts and contribute to urban sprawl. In addition to being inefficient and contrary to the Oregon Statewide Planning Goals, development of urban corridors through farm or forest land by extending and upgrading infrastructure through intervening unsuitable lands between the City limits and suitable sites would be more likely to

create or increase compatibility impacts with nearby agricultural and forest activities occurring on farm and forest land outside the UGB including but not limited to increased volume and speed of vehicle trips on rural roads, inducement of land use changes from rural to urban on intervening unsuitable lands, and land value speculation that has deleterious effects on local viability of farming.

The City's Public Facilities Analysis provides a summary of transportation and infrastructure extensions or improvements that would be needed to serve each alternative area, including the approximate length of service extensions and location of transportation system improvements that would be triggered by development in each area.

Urbanization of the North Gateway and Mill Race suitable employment lands will not affect forestry activities because the sites do not share edges with lands designated Forest in the Lane Rural Comprehensive Plan. Transportation and infrastructure extensions or improvements will not require crossing lands designated Forest.

Urbanization of Mill Race suitable employment lands will not affect agriculture activities because the sites do not share edges with lands designated Agriculture in the Lane Rural Comprehensive Plan. Transportation and infrastructure extensions or improvements will not require crossing lands designated Agriculture.

Urbanization of the North Gateway suitable employment lands will move the urbanizable edge farther north and thus has potential to affect agriculture activities occurring on lands between the proposed new edge of the UGB (at Sprague Road) and the McKenzie River. Agriculture uses in the area north of Sprague Road include the former Bloomer's Nursery (closed in 2016), and staff observed livestock grazing activity on the tracts between Sprague Road and the McKenzie River. Trucks, contractor and customer vehicles have operated on Sprague Road to access Bloomer's over the past years and no deleterious impacts to agriculture uses north of Sprague Road have been identified through the City's multi-year public involvement process. The City's Public Facilities Analysis identifies a need to improve Sprague Road to serve North Gateway suitable employment lands. Transportation impacts generated by development and any mitigation required to address those impacts are determined at time of plan amendment and zone change, annexation and the City development approval process in coordination with ODOT and other agencies and with input from potentially affected parties.

Urbanization of the North Gateway suitable employment lands will not affect agriculture activities occurring on lands on the opposite side of the McKenzie River because the river serves as a buffer between land uses. Additional buffering will be provided between the river and future development sites by the Natural Resource plan designation applied to the floodway area. The Transportation and infrastructure extensions or improvements to serve the North Gateway suitable employment lands will not require crossing the McKenzie River or adjacent rural lands.

Urbanization of Mill Race suitable employment lands will not affect agriculture activities south of the Willamette River (Seavey Loop) because the river and intervening public, parks and open space lands serves as a buffer.

The City confirmed its exclusion of other fourth priority lands based upon analysis of compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4) through the Alternatives Analysis process, as summarized in Tables 13 and 15 of this report. Table 13 General Description of Fourth Priority land provides maps and text to identify the location of each alternative area studied by the City in relationship with surrounding lands designated Agriculture or Forest in the Lane Rural Comprehensive Plan and the relative proximity of each area to the City. Table 17 Fourth Priority Land Public Facilities and Services Analysis Summary describes the facilities that would be needed to serve each area.

- This step confirmed exclusion of McKenzie View
- This step confirmed exclusion of Hayden Bridge
- This step confirmed exclusion of Thurston
- This step confirmed exclusion of Mohawk
- This step confirmed exclusion of Oxbow/Camp Creek
- This step confirmed exclusion of Far East
- This step confirmed exclusion of Clearwater
- This step confirmed exclusion of West Jasper/Mahogany
- This step confirmed exclusion of Jasper Bridge
- This step confirmed exclusion of South Hills
- This step confirmed exclusion of Wallace Creek
- This step confirmed exclusion of Seavey Loop

The City contacted USDA NRCS and Oregon Department of Agriculture staff to request technical assistance regarding statutes and administrative rules that are relevant when addressing soil capability classification⁹⁵ and relevant resources to consult as the City addressed Factor 4.

OAR 660-033-0030(2)

“When a jurisdiction determines the predominant soil capability classification of a lot or parcel it need only look to the land within the lot or parcel being inventoried. However, whether land is “suitable for farm use” requires an inquiry into factors beyond the mere identification of scientific soil classifications. The factors are listed in the definition of agricultural land set forth at OAR 660-033-0020(1)(a)(B). This inquiry requires the consideration of conditions existing outside the lot or parcel being inventoried. Even if a

⁹⁵ As recommended by USDA and OR Dept. of Ag staff, City staff consulted the most recent Census of Agriculture and special tabulations from the census developed by Oregon State University, the Oregon Department of Agriculture, the United States Department of Agriculture's NRCS, the Oregon State University Extension Service and the county assessor's office to obtain data to determine the nature of the existing commercial agricultural enterprise within the area for the purposes of this study.

lot or parcel is not predominantly Class I-IV soils or suitable for farm use, Goal 3 nonetheless defines as agricultural "Lands in other classes which are necessary to permit farm practices to be undertaken on adjacent or nearby lands." A determination that a lot or parcel is not agricultural land requires findings supported by substantial evidence that addresses each of the factors set forth in 660-033-0020(1)."

As previously stated, the City excluded fourth priority lands from consideration on the basis of soil capability classification.

- The City excluded **North Gateway — North of Sprague Road** lands comprising predominantly Class II soils on the basis of agricultural capability classification.
- The City excluded unconstrained **McKenzie View** lands comprising predominantly Class I and II soils on the basis of agricultural capability classification.
- The City excluded unconstrained **Oxbow/Camp Creek** lands comprising predominantly Class I, Class II and Class III High Value Farmland soils on the basis of agricultural capability classification.
- The City excluded unconstrained **Hayden Bridge** lands comprising predominantly Class II soils on the basis of agricultural capability classification.
- The City excluded unconstrained **Mohawk** lands comprising predominantly Class I and II soils on the basis of agricultural capability classification.
- The City excluded unconstrained **North Springfield Highway** lands comprising predominantly Class II soils on the basis of agricultural capability classification.
- The City excluded unconstrained **Thurston** lands comprising predominantly Class I and II soils on the basis of agricultural capability classification.
- The City excluded unconstrained **Far East — North of Highway 126** lands comprising predominantly Class I and II soils on the basis of agricultural capability classification.
- The City excluded unconstrained **South Hills** lands comprising predominantly Class III High Value Farmland soils on the basis of agricultural capability classification.
- The City excluded unconstrained **West Jasper/Mahogany** lands comprising predominantly Class II soils on the basis of agricultural capability classification.
- The City excluded unconstrained **Jasper Bridge** lands comprising predominantly Class I and II soils on the basis of agricultural capability classification.
- The City excluded unconstrained **Clearwater** lands comprising predominantly Class II soils on the basis of agricultural capability classification.
- The City excluded unconstrained **Wallace Creek** lands comprising predominantly Class II and III High Value Farmland soils on the basis of agricultural capability classification.
- The City excluded unconstrained **Seavey Loop** lands comprising predominantly Class II, Class III High Value and Class IV Prime Farmland soils on the basis of agricultural capability classification.

As previously stated, the City also excluded lands comprising soils of higher priority for expansion in the Clearwater, West Jasper/Mahogany, Wallace Creek, Thurston, Far East, Mohawk, Oxbow/Camp Creek and South Hills areas (identified in Table 13) on the basis of Specific Land Needs [ORS 197.298(3)(a)]; on

the basis of inability to reasonably provide urban services due to physical constraints [ORS 197.298(3)(b)]; and on the basis of comparative ESEE consequences.

Another, additional reason the City chose not to expand the UGB to include several non-contiguous parcels with soils of higher priority in the Clearwater, West Jasper/Mahogany, Wallace Thurston, Far East, Mohawk and Oxbow/Camp Creek areas (identified in Table 13), even though those parcels are not predominantly Class I-IV soils, is because the City reasoned that those lands are suitable and will remain suitable for farm use consistent with their Agriculture designation and Exclusive Farm Use zoning in the Lane Rural Comprehensive Plan because those lands are *“are necessary to permit farm practices to be undertaken on adjacent or nearby lands,”* consistent with the definition of agricultural land set forth at OAR 660-033-0020(1)(a)(B). The City assumed, based on the input it received from property owners, farmers, citizens and agriculture experts over the multi-year public involvement process, that the agricultural lands it excluded are — and will remain through the 2010-2030 planning period — more *“suitable for farm use as defined in ORS 215.203(2)(a), taking into consideration soil fertility; suitability for grazing; climatic conditions; existing and future availability of water for farm irrigation purposes; existing land use patterns; technological and energy inputs required; and accepted farming practices;”* than the two areas (North Gateway UGB to Sprague Road and Mill Race) the City chose to include in the UGB to meet its specific employment land needs.

The City reasoned that the agricultural lands it excluded will remain *“necessary to permit farm practices to be undertaken on adjacent or nearby agricultural lands.”*

The City reasoned that the agricultural lands it excluded will continue to support Commercial Agricultural Enterprise consisting of farm operations that will contribute in a substantial way to the area's existing agricultural economy; and help maintain agricultural processors and established farm markets.

The City reasoned that the agricultural lands it excluded will continue to support farm use as defined in ORS 215.203 and OAR Division 33 on lands designated Agriculture and zoned Exclusive Farm Use in the Lane Rural Comprehensive Plan by maintaining viable use of abutting high value farmland parcels [OAR 660-033-0030(2)], and by maintaining contiguous connected blocks of farmland through the planning period.

The City reasoned that the following facts and criteria are relevant to comparing the consequences of urbanization related to agriculture and forest uses within the locations it evaluated for inclusion in the UGB:

- Class I and II and high value or prime III or IV agricultural soils exist on and immediately abutting the areas.
- Agriculture area is physically buffered from the urban area by the river.
- Nonfarm (residential uses) exist throughout the area and there is little documented history of conflicts with agricultural operations in the area.

- Tract and field sizes are appropriate for the character of agriculture in the area.
- Existing land use regulations – EFU and exceptions zoning limit the ability to further divide area agricultural lands
- Opportunities for the direct marketing and promotion of agricultural products exists. Farm stands, U-picks and small farms producing high-value products for sale to the urban market are not uncommon and are increasing in the area. This lends itself to greater opportunities for farms to produce crops that cater to the ever-growing demand for locally produced food and other agricultural products.
- Comparative length of shared edge with the UGB.
- Comparative length of needed urban services extensions and improvements that would be required through or along bordering farm or forest lands.

Based on balanced consideration of the factors addressed above, the City reasoned that the potentially suitable Fourth Priority sites it excluded are better suited for the continued production of agricultural and forest products within the planning period because those areas are relatively well buffered and protected from urbanization by their distance, by their location within large blocks of farm and/or forest land, by their location on the opposite side of the McKenzie or Willamette Rivers, and by their relatively remote locations accessed via rural roads of narrow width restricted by geology and slopes and via weight-restricted bridges.

Based on balanced consideration of the factors addressed above, and based on evidence in the record, the City reasoned that the agricultural lands it included — North Gateway UGB to Sprague Road and Mill Race — are comparatively less suited for the continued production of agricultural products within the planning period because these areas are not well buffered from the City. Both areas abut the City limits and existing industrial land developed with industrial uses.

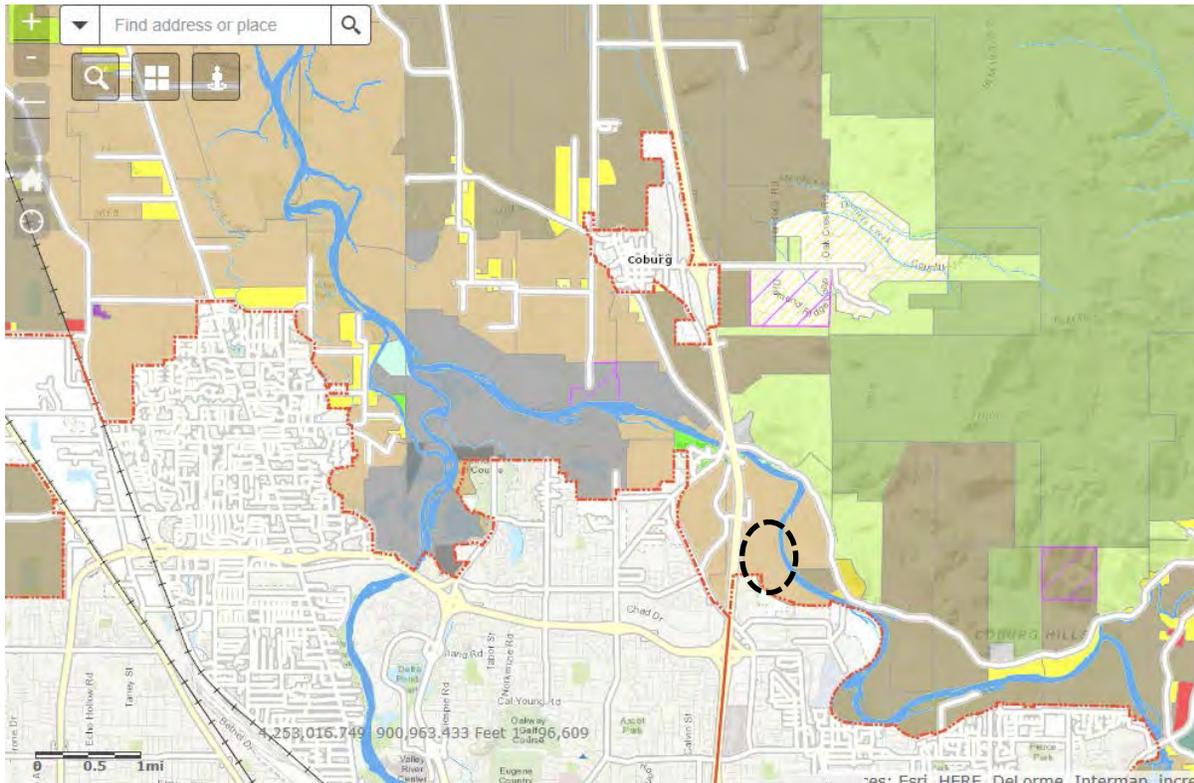
Any expansion of the UGB inherently alters the pattern of land uses in a given area as urbanizable lands develop over time. The City's analysis and the conclusions reached are reasonable and supported by ample evidence. The following maps are included to illustrate how the City's UGB expansion will result in a minimal overall alteration of the pattern of land uses in the Metro area, with an emphasis on how the expansion could amount and affect pattern of agricultural land uses in the region.

The following map⁹⁶ depicts the location of the proposed North Gateway UGB expansion (214 gross acres including right of way/132.1 unconstrained employment land acres) in relationship to resource land designated Agricultural (tan color) in the LRCP between the Springfield, Coburg and Eugene UGBs/urbanizable lands. The map shows how this block of farmland is already split (and rendered less viable) by Interstate Highway 5.

⁹⁶ <http://lcmaps.lanecounty.org/LaneCountyMaps/ZoneAndPlanMapsApp/index.html>

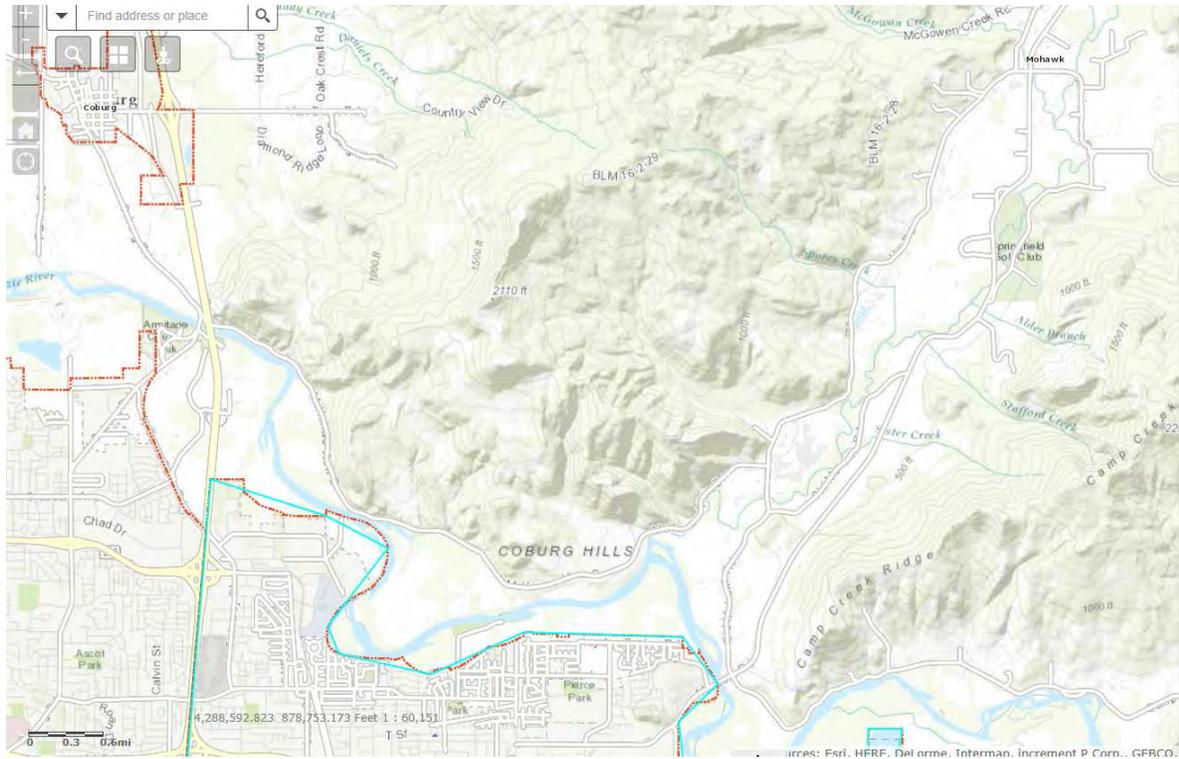


Sprague Road Overpass



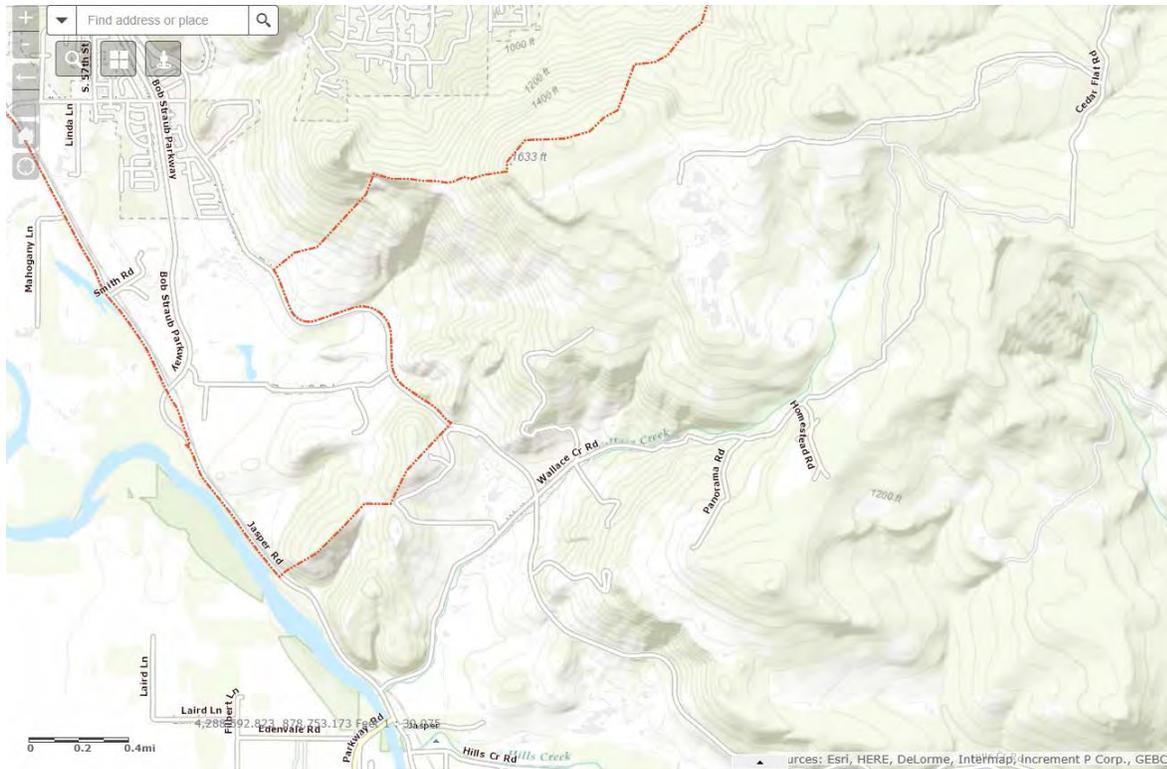
Goal 14 Locational Factor 4: Compatibility with Agriculture

Proposed North Gateway UGB employment land expansion relative to farmland north and west of Springfield UGB – farmland shown in beige color



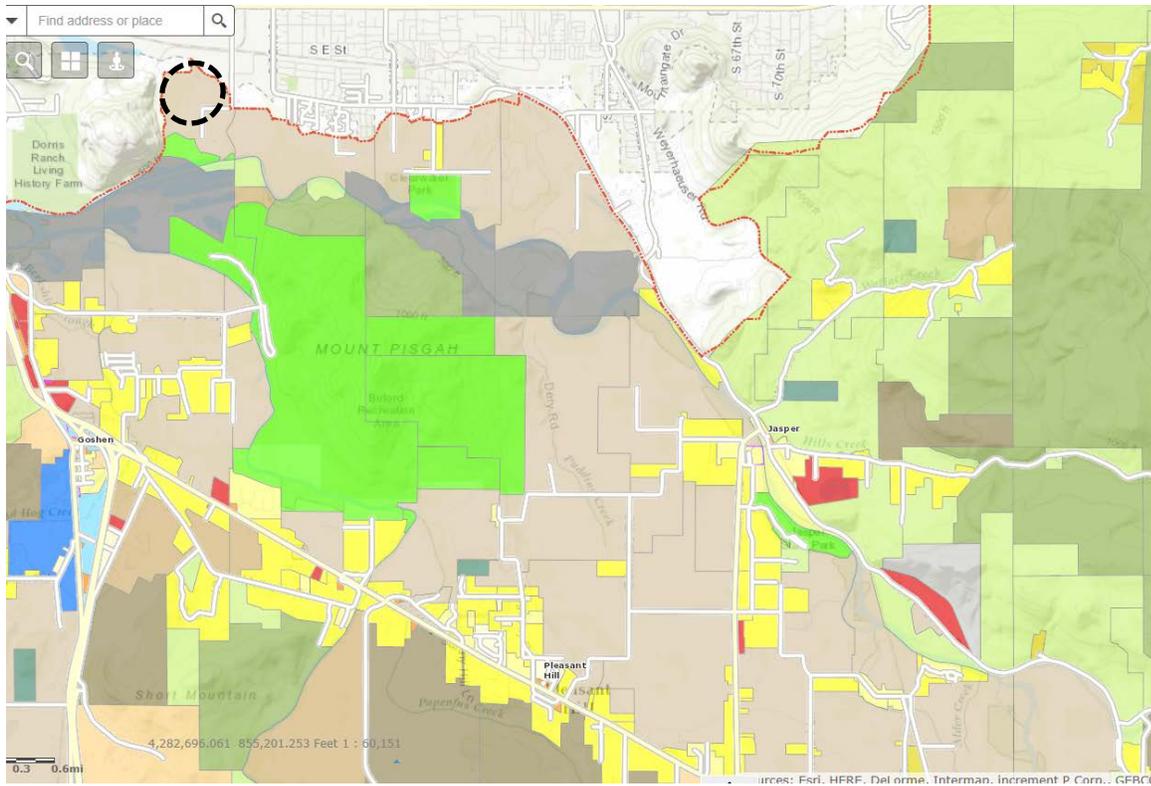
Topographic Constraints North of McKenzie River:
McKenzie View, Mohawk, and Camp Creek Study Areas⁹⁷

⁹⁷ <http://lcmaps.lanecounty.org/LaneCountyMaps/ZoneAndPlanMapsApp/index.html>



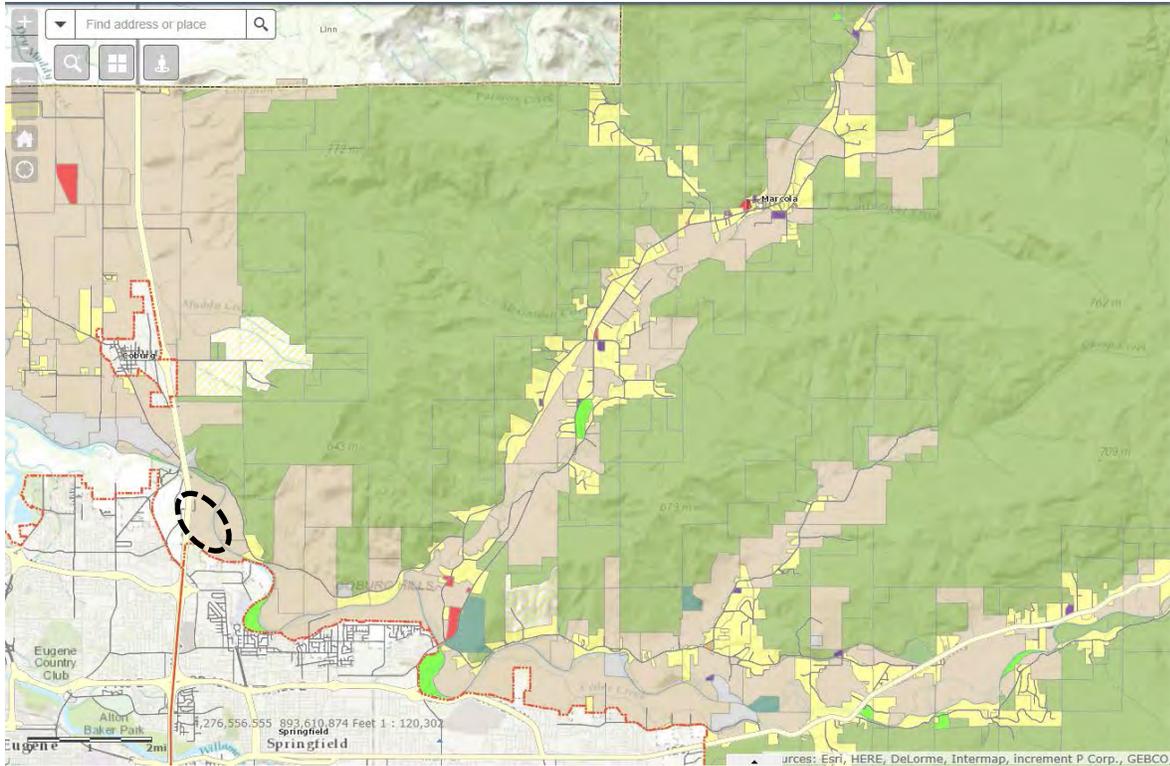
Topographic Constraints Southeast of UGB:
Wallace Creek Study Area⁹⁸

⁹⁸ <http://lcmaps.lanecounty.org/LaneCountyMaps/ZoneAndPlanMapsApp/index.html>

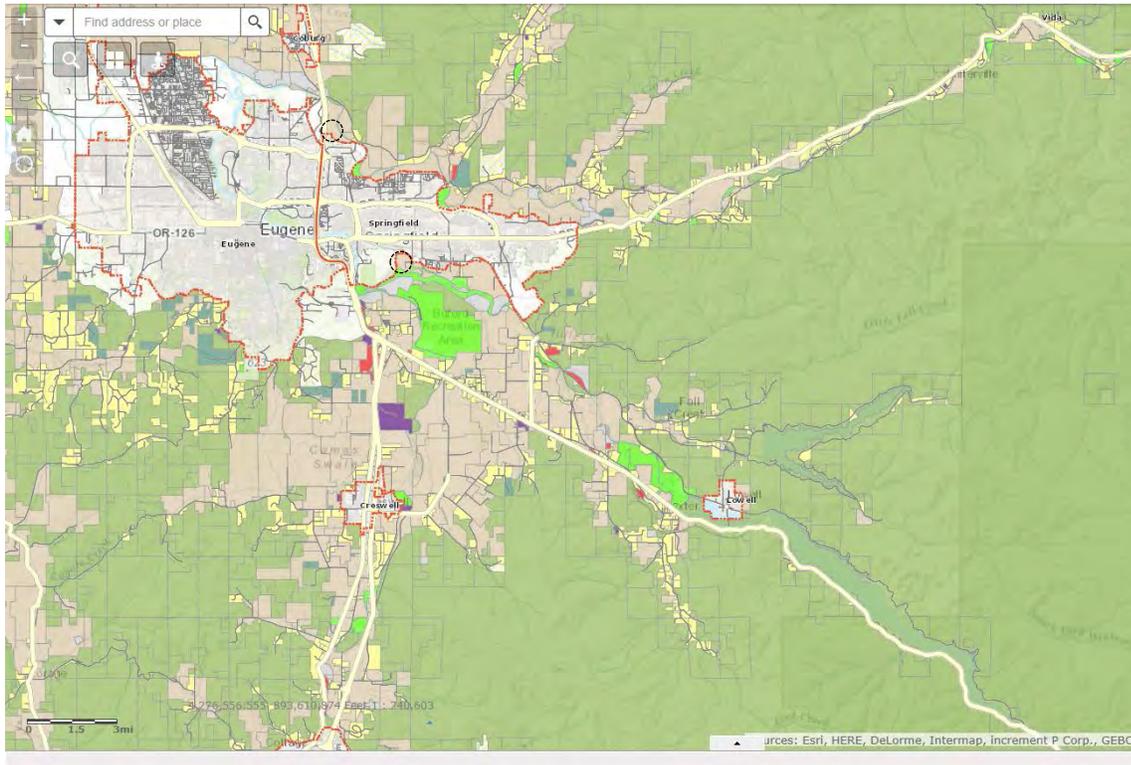


Goal 14 Locational Factor 4: Compatibility with Agriculture

Proposed Mill Race UGB employment land expansion relative to farmland south of Springfield UGB – farmland shown in beige color



Goal 14 Locational Factor 4: Compatibility with Agriculture and Forest Resource Lands
North Gateway UGB Employment Land Expansion



Goal 14 Locational Factor 4: Compatibility with Agriculture and Forest Resource Lands

Farmland Surrounding Eugene-Springfield Metro Area within Lane County – shown in beige color, Forestland shown in green.

○ = indicates Springfield UGB Employment Land Expansion

The preceding map depicts the location of land designated Agriculture in the Lane Rural Comprehensive Plan. The larger areas of land designated Agriculture are located south of the Springfield UGB.

The City’s analysis excluded the areas listed in Table 20 from further consideration.

Table 20: Fourth Priority Agriculture and Forest Land Excluded on the basis of specific land needs [ORS 197.298(3)(a)], Public Facilities [ORS 197.298(3)(b)], and ESEE Consequences

North Gateway (North of Sprague)	McKenzie	View	Oxbow/Camp	Creek
Hayden Bridge	Mohawk		North Springfield Highway	
Far East	South Hills		West Jasper/Mahogany	
Wallace Creek	Jasper	Bridge		
Seavey Loop Area 1	Thurston		Clearwater	

As explained in this report, and supported by the substantive and evidence in the record, the City conducted a complete and thorough alternatives analysis of fourth priority lands adjacent to the UGB that was not limited to those lots or parcels that abut the UGB, but also included all land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency. [OAR 660-024-0060(4)].

The City determined that fourth priority lands adjacent to or in the vicinity of the UGB cannot reasonably accommodate the identified employment land need. The City's decision was reached after identifying and evaluating resource land in the vicinity of the UGB, after identifying and evaluating potentially suitable parcels 5 acres or larger without absolute development constraints; after consultation with experts to identify needed site characteristics for the target industrial and commercial/mixed use industries identified in the CIBL/EOA that require sites 5 acres and larger and 20 acres and larger, including public facilities needs for industrial and commercial land development; after consultation with public facility and services providers including ODOT; after evaluation of exception land location and topography as it relates to the ability to extend public facilities of sufficient physical capacity and structure to support provision of urban services including water and wastewater mains and public transit service to UGB expansion areas; in consideration of applicable policies in the *Springfield Development Code* Chapter 5.7-100 for annexing territory; after consideration of infrastructure and transportation needs to serve lands already in the UGB as identified in the applicable *Eugene-Springfield Metropolitan Area Public Facilities and Services Plan*, applicable transportation system plans, facilities master plans and capital improvement programs; and after consideration of the City's development standards and requirements for urban development in the *Springfield Development Code* Chapters 3.2-300, 3.2-400, 3.2-600, 3.3-300, 3.3-400, 3.3-500, 3.3-1000, Chapter 4 in its entirety and the *Springfield Engineering Design Standards and Procedures Manual*.

After a thorough evaluation, the City determined that urbanization would be directed to North Gateway UGB to Sprague Road and to Mill Race because these lands provide comparative advantages over other areas and therefore can "reasonably accommodate" the identified specific industrial and commercial-mixed use land need for sites 5 acres and larger.

After conducting a thorough parcel-by-parcel evaluation of *potentially* suitable parcels that could reasonably accommodate the identified specific industrial and commercial-mixed use land need for sites 5 acres and larger and that are potentially serviceable due to proximity and lack of topographic or other physical constraints, the City determined that the comparative environmental, economic, social and energy consequences of directing urbanization to these two areas compare favorably to directing urbanization to other lands because land is suitable to meet the site needs of target industries and the amount of unconstrained land is more economically feasible to serve with public water and wastewater facilities on a cost basis.

After conducting a thorough parcel-by-parcel evaluation of the location of the **areas** in relationship to land designated for agriculture and forestry in the Lane Rural Comprehensive Plan; and after consideration of comparative environmental, energy, economic and social consequences of urbanizing those lands for the purpose of developing industrial and office commercial urban uses [Goal 14

Boundary Location Factor 3]; and after consideration of compatibility of the proposed industrial and office commercial urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB [Goal 14 Boundary Location Factor 4] the City concluded that urbanization of North Gateway UGB to Sprague Road and Mill Race is more economically viable on a service cost basis and is less likely to negatively affect nearby agricultural and forest activities occurring on farm and forest land outside the UGB by extending or expanding new corridors of urban development into areas primarily designated for agricultural and forest use. [

Thus, urbanization of the North Gateway UGB to Sprague Road site and Mill Race site compares favorably with other lands the City considered for inclusion in the UGB.

The City's conclusion was reached based on sound reasoning of ample data and is supported by substantial evidence in the record.

Table 21: Springfield UGB Expansion and Land Use Designations

Area	Suitable Employment Acres Designated Urban Holding Area – Employment (UHA-E)	Acres Designated Natural Resource (NR)	Acres Designated Public/Semi Public (P/SP)	Gross Acres (inc. right of way)
North Gateway	132.1	53.3	9.7	212.4
Mill Race	125	0	373.1	508.1
Other Parkland	0	0	72	72
Total Land Added	Total Suitable 257.1	Total Natural Resource 53.3	Total Public /Semi Public 454.8	792.5

Goal 14 Location Factors 1 and 2

In the next step the City applied and balanced Goal 14, Boundary Location Factors 1 and 2 to confirm selection of the parcels to be included in the UGB for industrial and commercial mixed use employment purposes.

Goal 14 Factor 1: Efficient accommodation of identified land needs. The North Gateway UGB expansion accommodates employment land needs efficiently. The three suitable North Gateway employment sites abut the UGB and City limits and thus do not require inclusion of unsuitable intervening lands. The North Gateway UGB expansion designates 139.4 acres of land in three contiguous tracts for employment (Urban Holding Area – Employment plan designation). Of the 139.4 acres so designated, 132.1 acres are unconstrained and suitable for development. 7.3 acres comprise waterways, riparian

resources, wetlands and slopes >15%. The City assumed that the public streets and facilities needed to serve development will be accommodated within the 139.4 acres designated Urban Holding Area – Employment.

The proximate location and ample size of the area will support efficient urban development of an employment center adjacent to an existing employment center. Two of the three sites about the City's International Way Campus Industrial employment center (existing employers include Royal Caribbean, Symantec, Richardson Sports, Pacific Source, Hawes Investments, and Oregon Medical Labs.)

The North Gateway UGB expansion adds 214 gross acres to the UGB. Gross acreage includes lands the City designated to ensure efficient, appropriate land use, to accommodate existing and planned public facilities, and to limit development to protect important natural resources: 53.3 floodway-constrained acres on two tracts fronting the McKenzie River "Natural Resource;" and 9.7 acres designated Public/Semi Public (EWEB parcel abutting I-5 that is developed with electric facilities and public water wells and Sprague Road right of way). Gross acreage includes 9.9 acres of right of way along Interstate Highway 5. The proposed UGB is along the centerline of the freeway, a consistent northerly extension of the existing centerline UGB.

The Mill Race UGB expansion accommodates employment land needs efficiently. The three suitable employment sites about the UGB and City limits and thus do not require inclusion of unsuitable intervening lands. The three sites comprise 78.3 suitable, contiguous unconstrained acres, large enough to accommodate a target industry employment use requiring a site size equal to or larger than the average Springfield large site size (63 acres)⁹⁹. The proximate location and ample size of the area will support efficient urban development of an employment center adjacent to an existing Heavy Industrial area.

As shown in the Map: Proposed UGB Expansion Area - Mill Race August 2015 (Ordinance Exhibit A , the City also included the 13 smaller parcels (ranging in size from 0.3 to 9.2 unconstrained acres) that are located between the suitable SUB and Johnson tracts and the publicly owned lands to the south the City is including and designating Public/Semi Public to accommodate existing Willamalane parks and SUB Willamette Well field and treatment plant. The City reasoned that if these lands are not included, they will become entirely surrounded by the UGB. The City reasoned that bringing these "extra" lands that are currently designated Agriculture in the Lane Rural Comprehensive Plan and zoned EFU into the UGB makes better sense than leaving those lands outside the UGB and within Lane County's land use planning jurisdiction. At previous joint work sessions of the Springfield City Council and Lane County in review of the City's UGB amendment, elected officials recommended against leaving "strips" of land in County jurisdiction between the UGB and the river.

City to add to in this section after conducting additional stakeholder outreach, open houses and public hearing.

⁹⁹ EcoNorthwest, Springfield CIBL/EOA Summary Report, August 2015, page 16, Characteristics of Large Site Needs.

Seven of the parcels comprise frontage along South 28th, South M, or South 26th Streets, three roads that will be needed to urbanize the Mill Race area. Thus, portions of these lands may be needed within the planning period to provide additional right of way to enable primary or secondary access and other urban services to the SUB and Johnson employment land tracts when these existing rural roads are improved to urban standards. Existing SUB water lines are located within easements on the parcels fronting 28th Street, South M Street. The City reasoned that the “extra” lands are needed to provide services to the needed suitable tracts to the west and north.

The City also reasoned that additional riparian resource buffers are likely to be required within the Mill Race area that will reduce the developable acreage. As previously stated in the Public Facilities Analysis “the Middle Fork Willamette River is federally classified as critical salmonid habitat and the Springfield Mill Race enhancement project was performed to provide additional salmonid habitat. Stormwater service within this area may require atypical restrictions and solutions and will present significant challenges considering the multiple overlapping regulatory jurisdictions for constructing new stormwater outfalls into the Springfield Mill Race, Gory Creek or Quarry Creek and the limitations regarding on-site stormwater management.” The City adopted Urbanization Element policies to address the unique natural resources of the Mill Race area that may require atypical development standards to ensure that development does adversely impact critical drinking water and surface water resources. Thus the “extra” parcels of land are necessary to ensure that the Mill Race area has sufficient land to accommodate the atypical stormwater management facilities that will be required to develop this area in conformance with atypical regulatory restrictions, to protect highly sensitive groundwater or surface water resources and/or to provide additional salmonid habitat mitigation that may be required.

The result of including these parcels “inflates” the City’s UGB expansion by 34 “extra” acres of employment land over and above the City’s overall land need. The City finds that adding these 34 excess acres is reasonable. The lands will be zoned “Agriculture – Urban Holding Area” to allow continuation of existing rural levels of use. 34 acres is 25% of the total 133.2 acres the City designated for employment. 25% is a reasonable amount of land need to assume for public services.

The City included 373.1 acres of public land within the Mill Race area in the UGB. Those lands are developed with Willamalane parks and public facilities. The City designated these lands Public/Semi Public.

The Mill Race UGB expansion includes 508.1 gross acres. Gross acres include right of way, acres constrained by wetlands, slopes >15%, riparian resource areas and floodway. Of that total, 373.1 acres are designated Public/Semi Public to accommodate existing and planned parks and public water system facilities; 135 acres are designated for employment. 125 of the 135 employment acres are unconstrained and suitable.

The City’s Mill Race UGB expansion and its designation of land within the area use land efficiently.

The City’s UGB expansion adds approximately 257 suitable acres of employment land on 273 gross acres within two geographic areas – North Gateway and Mill Race.

The City's UGB expansion adds approximately 257 suitable acres of employment land on 273 gross acres designated for employment use to meet the City's employment land need of 223 acres.

In addition to previously meeting all residential needs without expanding the UGB, Springfield will meet all need for industrial and commercial sites 5 acres or less without expanding the UGB.

The City's UGB accommodates identified land needs efficiently.

The City chose sites that will yield a high percentage of unconstrained land that is suitable for development of the target industries employment uses the City seeks to accommodate.

Goal 14 Factor 2: Orderly and economic provision of public facilities and services. The North Gateway site is located next to Interstate Highway 5 and is visible from the freeway. Some employers prefer freeway visibility.

The City's UGB expansion includes 455 acres of existing publicly-owned land, parks and open space designated Public/Semi Public. These lands were included in the amended UGB at the request of Willamalane and SUB to facilitate orderly and economic management of parks and recreation services, orderly and economic provision of public facilities that may be needed for park and recreation uses or for development of public water system facilities needed to serve Springfield's needs.

ORS 197.298 / Goal 14 Conclusion: In summary, as explained in this report and based on the evidence herein and supported by additional evidence in the record, the City properly applied and followed the prioritization requirements in ORS 197.298 and Goal 14 to the UGB alternatives analysis when it studied, evaluated and selected land which land to be included within the urban growth boundary amendment. The State's acknowledgement of the locally adopted Springfield 2030 Comprehensive Plan and UGB Amendment will provide reasonable opportunities in Springfield for urban commercial and industrial needs for the 2010-2030 period through changes to the urban growth boundary. [ORS 197.712(2)(g)(B)]

The following findings and conclusions support the Commission's affirmation of the proposed Springfield 2030 Comprehensive Plan and UGB amendments as they apply or interpret applicable goals or rules in their review of the subject proposal.

ORS 197.707 Legislative intent states: *"It was the intent of the Legislative Assembly in enacting ORS chapters 195, 196, 197, 215 and 227 not to prohibit, deter, delay or increase the cost of appropriate development, but to enhance economic development and opportunity for the benefit of all citizens. [1983 c.827 §16]"*

ORS 197.712(1) Commission duties states: *"...in carrying out statewide comprehensive land use planning, the provision of adequate opportunities for a variety of economic activities throughout the state is vital to the health, welfare and prosperity of all the people of the state."*

ORS 197.712(2) Commission duties states that when LCDC applies and interprets existing goals or rules, the Commission shall implement the following:

(a) Comprehensive plans shall include an analysis of the community's economic patterns, potentialities, strengths and deficiencies as they relate to state and national trends.

(b) Comprehensive plans shall contain policies concerning the economic development opportunities in the community. (emphasis added)

(c) Comprehensive plans and land use regulations shall provide for at least an adequate supply of sites of suitable sizes, types, locations and service levels for industrial and commercial uses consistent with plan policies. (emphasis added)

(d) Comprehensive plans and land use regulations shall provide for compatible uses on or near sites zoned for specific industrial and commercial uses. (emphasis added)

(g) Local governments shall provide:

(B) Reasonable opportunities for urban residential, commercial and industrial needs over time through changes to urban growth boundaries. (emphasis added)

The City's proposed Springfield 2030 Comprehensive Plan and UGB amendments are based on the Economic Opportunities Analysis — *"an analysis of the community's economic patterns, potentialities, strengths and deficiencies as they relate to state and national trends."*

The Springfield Comprehensive Plan Economic Element *"contains policies concerning the economic development opportunities in the community,"* in response to the Economic Opportunities Analysis, prepared and locally adopted to implement the provisions of Goal 9 and OAR Division 9.

The Springfield Comprehensive Plan and UGB, as amended through State acknowledgement of the subject comprehensive plan and UGB amendment proposals, provide for *"at least an adequate supply of sites of suitable sizes, types, locations and service levels for industrial and commercial uses consistent with plan policies,"* including applicable Metro area transportation and public facilities policies.

The City's Urbanization Element policies and "Urban Holding Area – Employment" land use designation protect lands added to the UGB from premature or incompatible interim development and ensure that the lands added to the UGB will *"provide an adequate supply of sites of suitable sizes, types, locations and service levels for industrial and commercial uses consistent with plan policies,* including sites with the required characteristics typically needed to *accommodate specific industrial and commercial uses.* This, the lands the City added to the UGB to meet specific industrial and commercial needs are designated and zoned properly and adequately to retain those lands to accommodate those specific industrial and commercial uses.

The City's application of "Agriculture – Urban Holding Area" zoning to lands added to the UGB designated for specific industrial and commercial uses *provides for compatible interim uses on sites zoned for specific industrial and commercial uses* but does not allow interim uses that would preclude urban development of the land to accommodate the specific industrial and commercial needs identified in the Economic Opportunities Analysis and Economic Element policies.

Implementation of the City's Urbanization Element policies will ensure that lands added to the UGB can reasonably and efficiently be provided with urban services including but not limited to public sewer, water and transportation services, including public transit services to support the land uses contemplated in the comprehensive plan and land use regulations.

Springfield's 2030 Comprehensive plan policies, applicable Metro Plan designations, existing applicable Springfield refinement plan designations and policies, existing Springfield Zoning Map designations, and land use regulations implemented through the Springfield Development Code *provide for compatible uses on or near sites zoned for specific industrial and commercial uses.*

Through previous adoption in 2011 by the Springfield City Council and Lane County of the 2030 Residential Element policies and through implementation of those policies to meet residential land needs for the 2010-2030 planning period without expanding the UGB (2013 Glenwood plan amendments), the local governments have already provided reasonable opportunities for urban residential needs.

Through local adoption by the Springfield City Council and Lane County of the proposed Springfield 2030 Comprehensive Plan and UGB amendments, the local governments are *providing reasonable opportunities for urban commercial and industrial needs over time through changes to Springfield's urban growth boundaries.*

As explained in this report and as thoroughly documented through ample evidence provided in the record the Springfield 2030 Comprehensive Plan and UGB amendments are consistent with the applicable provisions of Oregon law.

VII. 2030 Plan Compliance with Other Planning Goals and Metro Plan Policies

Metro Plan Environmental Resources Element

The Environmental Resources Element of the Metro Plan, III-C-1 states:

“The Environmental Resources Element addresses the natural assets and hazards in the metropolitan area. The assets include agricultural land, clean air and water, forest land, sand and gravel deposits, scenic areas, vegetation, wildlife, and wildlife habitat. The hazards include problems associated with floods, soils, and geology. The policies of this element emphasize reducing urban impacts on wetlands throughout the metropolitan area and planning for the natural assets and constraints on undeveloped lands on the urban fringe.” (emphasis added)

“The natural environment adds to the livability of the metropolitan area. Local awareness and appreciation for nature and the need to provide a physically and psychologically healthy urban environment are reasons for promoting a compatible mix of nature and city. Urban areas provide a diversity of economic, social, and cultural opportunities. It is equally important to provide diversity in the natural environment of the city. With proper planning, it is possible to allow intense urban development on suitable land and still retain valuable islands and corridors of open space. Open space may reflect a sensitive natural area, such as the floodway fringe, that is protected from development. Open space can also be a park, a golf course, a cemetery, a body of water, or an area left undeveloped within a private commercial or residential development. Agricultural and forested lands on the fringe of the urban area, in addition to their primary use, provide secondary scenic and open space values.” (emphasis added)

*“The compact urban growth form concentrates urban development and activities, thus protecting valuable resource lands on the urban fringe. But concentrating development increases pressures for development within the urban growth boundary (UGB), making planning for open space and resource protection a critical concern within that boundary.”*¹ Planning can ensure the

¹ As explained in the *Metro Plan* Preface and Chapter I, Eugene, Springfield and Lane County are taking incremental steps to transition from a single “metropolitan UGB” to two separate UGBs, “the Eugene UGB” and “the Springfield UGB.” The general references to “the UGB” within the Environmental Resources Element of the *Metro Plan* shall be interpreted as applying to any UGB within the *Metro Plan* area, unless the text specifically refers to the metropolitan UGB, the Springfield UGB or the Eugene UGB.

coexistence of city and nature; one example is the Greenway.” (emphasis added)

“The Environmental Resources Element provides broad direction for maintaining and improving our natural urban environment. Other elements in the Metro Plan that provide more detail with particular aspects of the natural environment: Greenway, River Corridors and Waterways; Environmental Design; Public Facilities and Services; and Parks and Recreation Facilities. The emphasis in the Environmental Resources Element is the protection of waterways as a valuable and irreplaceable component of the overall natural resource system important to the metropolitan area. Waterways are also addressed in the “Greenway and Public Facilities and Services elements.” While some overlap repetition is unavoidable, the Greenway element emphasizes the intrinsic value of the Willamette River waterway for enjoyment and active and passive use by residents of the area. The public facilities element deals with components of the natural resource system in the context of the water and stormwater systems. The public facilities element includes findings and policies related to waterways, groundwater, drinking water protection, the Clean Water Act, and the Endangered Species Act. “(emphasis added)

“The inventories conducted as the basis for this element and the goals and policies contained herein address Statewide Planning Goals 3, 4, 5, 6, and 7 and interpret those goals in the context of the needs and circumstances of the metropolitan area.”

The City’s 2030 Plan amendments re-designate 53.3 acres of agricultural land to “Natural Resource” in the North Gateway area. The Natural Resource designation area is coterminous with the FEMA floodway along the floodway of the McKenzie River.

The City’s 2030 Plan amendments designate 399.2 acres of land Public/Semi Public. Of this acreage, 148.7 acres are already parkland and will be zoned Public Land and Open Space (PLO) to remain parkland. 72 acres will be rezoned from EFU to PLO. The proposal zones a total of 361 public land acres to Public Land and Open Space.

The City’s 2030 Plan amendments designate 274.4 acres of agricultural land (including existing roads and right of way) “Urban Holding Area – Employment.”

The City’s 2030 Plan amendments redesignate 1.8 acres of private land from Park to “Urban Holding Area – Employment.”²

² The Land Rural Comprehensive Plan map shows “Park” designation along the eastern parcel lines of Tax lots 18030100 500, 18030100 501 and 18030100 2000 west of the existing UGB line. The Park designation as shown does not follow waterways or other natural features.

The City's 2030 Plan amendments re-zone 327 acres from Exclusive Farm Use (EFU) to "Agriculture – Urban Holding Area" (AG).

The City's 2030 Plan amendments will yield 53.3 acres of Natural Resource land, 361 acres of Public Land and Open Space land, a total of 414.3 acres. The City's 2030 Plan amendments will yield 274 gross acres of land designated to allow urbanization for urban employment uses.

As a result of the City's 2030 Plan amendments, 414.3 acres of the 575.8 acres of EFU land affected by the plan change will be designated Public/Semi Public and Natural Resource. Both plan designations support implementation of Metro Plan Environmental Resources Element goals 1-4 (p. III-C-3) by:

1. *"Protect valuable natural resources and encourage their wise management, use, and proper reuse."*
2. *"Maintain a variety of open spaces within and on the fringe of the developing area."*
3. *"Protect life and property from the effects of natural hazards."*
4. *"Provide a healthy and attractive environment, including clean air and water, for the metropolitan population."*

As explained in the City's findings under Goal 5 and 6, lands added to the UGB will become subject to existing Springfield Development Code (SDC) land use regulations that require riparian area setbacks, restoration and enhancement along Water Quality Limited Waterways and wetlands to protect and enhance water quality and aquatic species habitat. Development of land within the floodplain is subject to the City's SDC 3.3-400 Floodplain Overlay District to protect life and property from the effects of natural hazards. Springfield's existing development standards have previously been acknowledged to be in compliance with the Metro Plan Environmental Resources Element and applicable Statewide planning goals and administrative rules.

The 2030 Plan amendments will protect and enhance waterways through application of existing acknowledged Metro Plan policies and Springfield Development Code land use regulations to all lands added to the UGB.

The Environmental Resources Element of the Metro Plan, Policy C.1 states:

"Where agricultural land is being considered for inclusion in future amendments to the UGB, least productive agricultural land shall be considered first. Factors other than agricultural soil ratings shall be considered when determining the productivity of agricultural land. Relevant factors include suitability for grazing, climatic conditions, existing and future availability of water for farm irrigation, ownership patterns, land use patterns, proximity to agricultural soils or current farm uses, other adjacent land uses, agricultural

history, technological and energy inputs required, accepted farming practices, and farm market conditions.”

As explained in the findings under Goal 14, the City’s UGB amendment follows the prioritization of land required by ORS 197.298 and the Goal 14 Location Factors.

The Environmental Resources Element of the Metro Plan, Policy C.3 directs a future study to:

“evaluate approaches to use in order to maintain physical separation between the Eugene-Springfield metropolitan area and smaller outlying communities.”

As explained in the findings under Goal 14, the City’s UGB amendment, like UGB amendments by other cities, is required to follow the prioritization of land required by ORS 197.298 and the Goal 14 Location Factors. The City has no authority to require other cities to *maintain physical separation between the Eugene-Springfield metropolitan area and smaller outlying communities*. The City’s analysis explains the City’s rationale for its choice to include the North Gateway and Mill Race sites. The City’s findings provide maps³ depicting the physical separation between Springfield and smaller outlying communities. The City’s choice maintains physical separation between the smaller outlying communities of Marcola, Goshen, Jasper, Pleasant Hill, and Cedar Flat that are located within or near the City’s UGB Preliminary Study Area. The City’s choice to include the North Gateway site, combined with Coburg’s UGB expansion choice, slightly reduces the separation between Springfield and Coburg. The City’s choice to include the Mill Race site does not reduce separation between Springfield and smaller outlying communities. The City’s 2030 Plan amendments are consistent with the intent of Environmental Resources Element Policy C.3.

Environmental Resources Element, Policy C.5 addresses Forestlands:

“Metropolitan goals relating to scenic quality, water quality, vegetation and wildlife, open space, and recreational potential shall be given a higher priority than timber harvest within the UGB.”

The City’s Development Code 5.19-100 implements Policy C.5 by regulating timber harvest within the UGB. This existing regulation will apply to lands added to the Springfield UGB.

Environmental Resources Element, Policy C.19 states:

“Agricultural production shall be considered an acceptable interim and temporary use on urbanizable land and on vacant and underdeveloped urban land where no conflicts with adjacent urban uses exist.”

Environmental Resources Element, Policy C.20 states:

³ Page 405-407

“Continued local programs supporting community gardens on public land and programs promoting urban agriculture on private land shall be encouraged. Urban agriculture includes gardens in backyards and interim use of vacant and underdeveloped parcels.”

The 2030 Plan amendments establish and apply the “Agriculture – Urban Holding Area” zoning district to urbanizable lands added to the UGB to allow agricultural production and community gardens as acceptable interim and temporary uses on land designated to meet long-term employment land needs.

Environmental Resources Element, Policy C.21 states:

“When planning for and regulating development, local governments shall consider the need for protection of open spaces, including those characterized by significant vegetation and wildlife. Means of protecting open space include but are not limited to outright acquisition, conservation easements, planned unit development ordinances, streamside protection ordinances, open space tax deferrals, donations to the public, and performance zoning.”

The City’s 2030 Plan amendments include plan designations and plan policies that consider and address the need for protection of open spaces and protection of significant vegetation and wildlife within the areas added to the UGB.

The City designated 53.3 acres of privately-owned agricultural land to “Natural Resource” in the North Gateway area in consideration of the need for protection of open spaces, including those characterized by significant vegetation and wildlife. The Natural Resource designation area is coterminous with the FEMA floodway along the floodway of the McKenzie River. The City’s riparian area protection ordinance is applied to all lands added to the UGB.

The City designated 399.2 acres of land Public/Semi Public. Including these lands in the UGB establishes consistent policies and land use regulations to support existing SUB-City-Willamalane partnership efforts to acquire, protect, connect, and enhance public open spaces and waterways in the Mill Race expansion area. The City’s findings under Goal 8 and Goal 11 explain why the City incorporated existing parkland and other public land owned by the City and Springfield Utility Board (SUB) in the UGB expansion to meet community park and open space needs identified in the adopted *Willamalane Comprehensive Plan*, to partially address the 300-acre deficit of parkland identified in the City’s acknowledged residential land inventory (*Residential Land Use and Housing Needs Analysis*), and to accommodate SUB’s existing and planned public water system water facilities.

The 2030 Plan amendments include Urbanization Element policies requiring updates to applicable natural resource inventories prior to land use approval that permits urban development in the North Gateway and Mill Race UGB expansion areas.

The 2030 Plan amendments include Urbanization Element policies that require adoption of updated implementation measures to protect drinking water and surface water resources prior to approval of rezoning that permits urban development.

The City's 2030 Comprehensive Plan Urbanization Element, Policy 47 states:

“Prior to approval of a plan amendment or zone change that permits urban development within the North Gateway or Mill Race District urbanizable lands, the Springfield Local Wetland Inventory shall be updated in accordance with Statewide planning Goal 5 and Goal 5 administrative rules requirements.”

The City's 2030 Comprehensive Plan Urbanization Element, Policy 48 states:

“Prior to approval of a plan amendment or zone change that permits urban development within the North Gateway or Mill Race District urbanizable lands, the Springfield Natural Resources Inventory shall be updated in accordance with Statewide planning Goal 5 and Goal 5 administrative rules requirements and the Springfield Natural Resources Study shall be amended. The inventory process shall map the resource areas, determine significance, and adopt a list of significant resource sites as part of the comprehensive plan and land use regulations. More precise field surveys to locate top of bank and to monument riparian area setbacks are required prior to site plan approval and issuance of building permits.”

The City's 2030 Comprehensive Plan Urbanization Element, Policy 49 states:

“Employment Lands designated UHA-E shall be planned and zoned as economic districts that provide and promote suitable sites for clean manufacturing⁴ uses and office/tech/flex employers in Springfield's target industry sectors. Limited neighborhood-scale retail uses that primarily serve employees within an industrial or office building or complex may be permitted as a secondary element within employment mixed-use zones. Urban Holding Area-Employment (UHA- E) sites shall not be re-designated or zoned to permit development of regional retail commercial uses.”

The City's 2030 Comprehensive Plan Urbanization Element, Policy 50 states:

“The Springfield Water Quality Limited Waterways Map shall be updated to include the North Gateway and Mill Race Districts. Springfield's implementation measures to maintain the City's compliance with the Clean

⁴ For the purposes of this policy, “clean” is defined as land uses, construction practices, and business operations that minimize waste and environmental impacts, and that contribute to a safe, healthy, and clean community, maintain the aquifer recharge capacity of the site by reducing impervious surfaces, and protect Springfield's drinking water source areas from contamination.

Water Act and other Federal resource protection mandates shall automatically apply to the lands included in the UGB though the provisions of the Springfield Development Code.”

The City’s 2030 Comprehensive Plan Urbanization Element, Policy 51 states:

“Grow and develop the City in ways that will to ensure the stability of Springfield’s public drinking water supply to meet current and future needs.

- ***Prior to City approval of annexation, land division or site development in the North Gateway and Mill Race UHA-E districts, the City — in partnership with Springfield Utility Board — shall conduct a Springfield Development Code Amendment process to prepare and apply specialized development standards that protect Drinking Water Source Areas to urbanizable lands designated UHA-E to ensure that new development contributes to a safe, clean, healthy, and plentiful community drinking water supply. The standards shall identify design, development, construction and best management processes appropriate and necessary to maintain aquifer recharge and protect drinking water quality and quantity. The standards shall also identify land use buffers appropriate and necessary to protect the Willamette Wellfield and the surface water features that are known to be in hydraulic connection with the alluvial aquifer.***
- ***Continue to Update the Springfield Comprehensive Plan and Springfield Development Code as new natural hazards information becomes available.***
- ***Encourage increased integration of natural systems into the built environment, such as vegetated water quality stormwater management systems and energy-efficient buildings.”***

The Springfield CIBL/EOA identified floodway, riparian resource areas and wetlands within the existing and expanded UGB as absolute development constraints, thus the City is not assuming lands with these features are developable for inventory purposes. The City designated a 20-year supply of land that is unconstrained, suitable, and sufficient to meet its commercial and industrial land needs, after careful consideration of the need for protection of open spaces and protection of significant vegetation and wildlife within the existing UGB and expanded UGB.

The 2030 Plan designates and zones land and provides policies to implement protection of open spaces and protection of significant vegetation and wildlife.

Environmental Resources Element, Policy C.25 states:

“Springfield, Lane County, and Eugene shall consider downstream impacts when planning for urbanization, flood control, urban storm runoff, recreation, and water quality along the Willamette and McKenzie Rivers.”

The 2030 Plan amendments include plans for urbanization within and adjacent to the floodplains and drainage basins of the Willamette and McKenzie Rivers. Development of land within the floodplain is subject to the City’s SDC 3.3-400 Floodplain Overlay District to protect life and property from the effects of natural hazards and SDC 3.3-300 to regulate uses and development setbacks within the greenway. The City regulates development to address flood control, urban storm runoff, recreation, and water quality through its implementation of SDC 4.3-110, 4.3-115, 4.3-117 and 3.3-200 at time of development approval.

Environmental Resources Element, Policies C.30 and 31 state:

“Except as otherwise allowed according to Federal Emergency Management Agency (FEMA) regulations, development shall be prohibited in floodways if it could result in an increased flood level. The floodway is the channel of a river or other water course and the adjacent land area that must be reserved to discharge a one-percent-chance flood in any given year.”

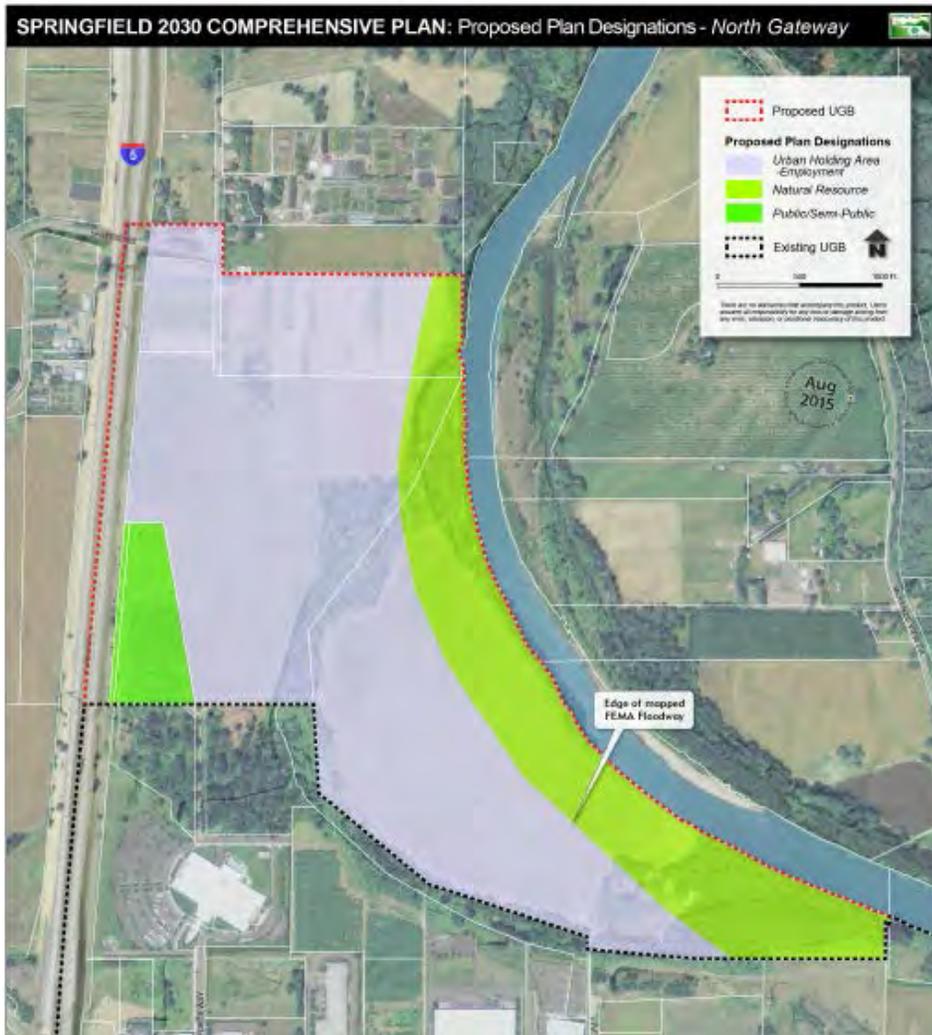
“When development is allowed to occur in the floodway or floodway fringe, local regulations shall control such development in order to minimize the potential danger to life and property. Within the UGB, development should result in in-filling of partially developed land. Outside the UGB, areas affected by the floodway and floodway fringe shall be protected for their agricultural and sand and gravel resource values, their open space and recreational potential, and their value to water resources.”

The City’s land inventories did not count land within the floodway as developable. The CIBL/EOA identified floodway, riparian resource areas and wetlands within the existing and expanded UGB as absolute development constraints, thus the City is not assuming lands with these features are developable for inventory purposes. The City designated a 20-year supply of land that is unconstrained, suitable, and sufficient to meet its commercial and industrial land needs, after careful consideration of the need for protection of open spaces and protection of significant vegetation and wildlife within the existing UGB and expanded UGB. Development of land within the floodplain is subject to the City’s SDC 3.3-400 Floodplain Overlay District to protect life and property from the effects of natural hazards.

2030 Plan re-designates floodway land to Natural Resource and Public/Semi Public. The City’s 2030 Plan amendments designate the 53.3 acres of agricultural land within the FEMA floodway along the floodway of the McKenzie River as “Natural Resource” in the North Gateway area.⁵

⁵ As shown in the **Map: Proposed Plan Designations North Gateway**

The Natural Resource designation area is coterminous with the FEMA floodway along the floodway of the McKenzie River.



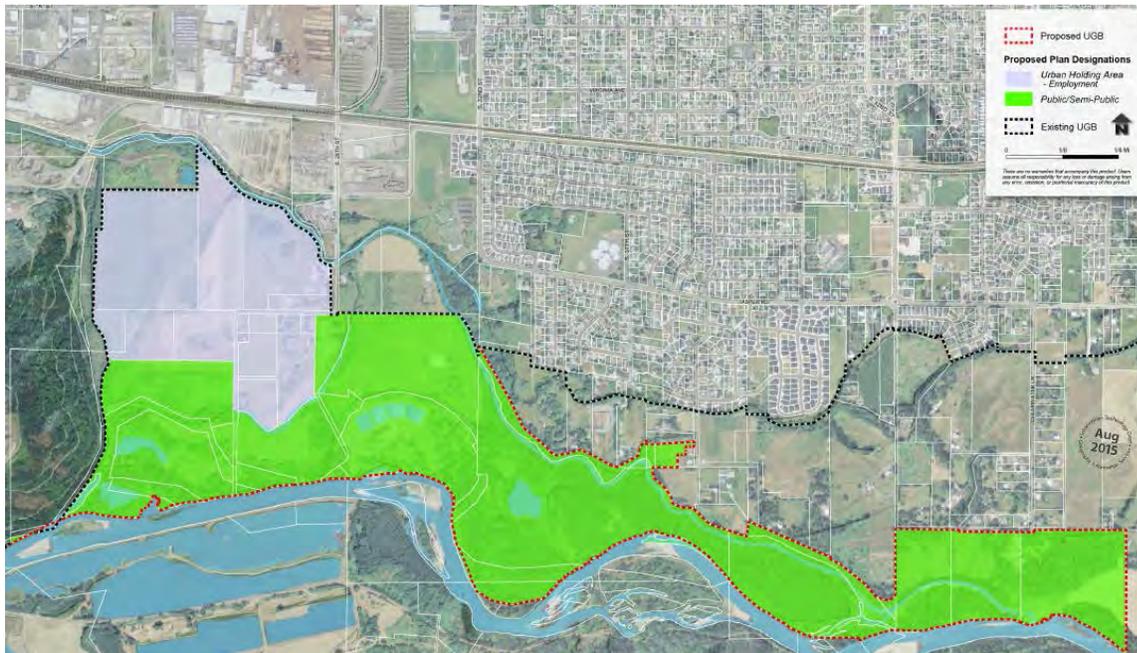
Floodway Extent and Natural Resource Designation: North Gateway UGB Expansion Area

The Middle Fork Willamette River floodway within the Mill Race UGB expansion area is on public land. The 2030 Plan designates that land Public/Semi Public.



Middle Fork Willamette Floodway Extent on Public Land – Mill Race UGB Expansion⁶
(Cross hatch = FEMA floodway)

⁶ As shown in **Map – Proposed UGB Expansion – Mill Race**



Public/Semi Public Plan Designation: Mill Race UGB Expansion Area

The City’s riparian area protection ordinance is applied to all lands added to the UGB, including water quality limited waterways (WQLW) that are direct tributaries to the McKenzie and Willamette Rivers.

Policies of the Metro Plan Environmental Resources Element will continue to be applicable to Springfield, as refined through adoption of adopted policies in the Springfield Comprehensive Plan.

Conclusion Metro Plan Environmental Resources Element: The 2030 Plan designates and zones land and provides policies to implement the applicable policies of the Metro Plan Environmental Resources Element.

Metro Plan Willamette River Greenway, River Corridors, and Waterways Element and Statewide Planning Goal 15: Willamette River Greenway

OAR 660-015-0005

To protect, conserve, enhance and maintain the natural, scenic, historical, agricultural, economic and recreational qualities of lands along the Willamette River as the Willamette River Greenway.

The Metro Plan Willamette River Greenway, River Corridors, and Waterways Element implements Statewide Planning Goal 15 Willamette River Greenway. The Metro Plan Willamette River Greenway, River Corridors, and Waterways Element is and will continue to be Springfield's existing acknowledged comprehensive plan adopted pursuant to ORS Chapter 197 and other applicable statutes, goals and guidelines for jurisdictions along the river.

660-024-0020 (1)(e) Adoption or Amendment of a UGB

“(1) All statewide goals and related administrative rules are applicable when establishing or amending a UGB, except as follows:

(e) Goal 15 is not applicable to land added to the UGB unless the land is within the Willamette River Greenway Boundary.”

Pursuant to OAR 660-024-0020(1)(e) Goal 15 is not applicable to land added to the UGB unless the land is within the Willamette River Greenway Boundary.

The 2030 Plan UGB amendment includes land within the Willamette Greenway, therefore Goal 15 is applicable where the Willamette River Greenway coincides with lands added to the UGB in the Mill Race UGB expansion area.

In addition to the Willamette River Greenway, the Metro Plan Willamette River Greenway, River Corridors, and Waterways Element addresses river corridors and waterways.

Policies of the Metro Plan Willamette River Greenway, River Corridors, and Waterway Element will continue to be applicable to Springfield, as refined through adoption of policies in the Springfield Comprehensive Plan.⁷

The 2030 Plan addresses continued compliance with Goal 15 by demonstrating the Plan's consistency with acknowledged Metro Plan policies, by adding new Springfield-specific policies to more specifically address the Greenway land in the Mill Race UGB expansion area, and by implementing Greenway plan policies through the existing Springfield Development Code regulations⁸ applicable to lands within the Willamette Greenway Overlay District.

Willamette River Greenway, River Corridors, and Waterways Element III-D-1 states:

⁷ The jurisdictional area of the *Metro Plan* was found to be in compliance with Goal 15 on September 12, 1982. Subsequent Willamette Greenway boundary determinations have acknowledged by Springfield, Eugene and Lane County.

⁸ SDC 3.3-300 Willamette Greenway Overlay District.

“The Willamette River has long been recognized in the Eugene-Springfield area as a valuable natural asset. A number of policy documents and programs adopted by local jurisdictions have reinforced the community concern to preserve and protect metropolitan river corridors.”

“In the metropolitan area, a large portion of land within the Greenway is in public ownership or public parks such as Mount Pisgah, Skinner’s Butte, Alton Baker, and Island Park.”

“The three jurisdictions cooperated in the development of a bicycle-pedestrian trail system that extends along the Greenway from south of Springfield to north of Eugene and into the River Road area.”

Land along the Greenway in private ownership is in a variety of uses, some of which appear to provide greater opportunity than others for public access and enjoyment. “Certain commercial uses, such as restaurants, can allow customers visual enjoyment of the Greenway. Other uses, such as the many industrial uses, would appear to provide little if any opportunity for access or enjoyment of the Greenway. This is evidenced by much of the existing industrial development along the Willamette River in the Glenwood area.”

Springfield and Lane County previously adopted a new plan for the Glenwood riverfront⁹ that requires and supports transition of land uses along the river from industrial to Residential Mixed Use, Office Mixed Use, Commercial Mixed Use and Employment Mixed Use. Implementation of the plan through the redevelopment of Glenwood will provide opportunities for public access and enjoyment of the Greenway, while maintaining the supply of land to meet 20-year residential and employment needs.

“The statewide Greenway goal specifically applies to the Willamette River. In the Eugene-Springfield area, portions of the McKenzie River share equal importance as a natural resource worthy of conservation and protection. Additionally, the metropolitan network of waterways and associated creeks and drainageways are important features in the metropolitan area, with potential as part of an areawide waterways system. For that reason, while this element must specifically cover the Willamette River Greenway, it is important to consider the McKenzie River, where it is situated within the area of the Metro Plan and the inland system of waterway corridors connecting various parts of Springfield, Eugene, and Lane County to one another.”

⁹ Glenwood Refinement Plan Phase One Amendments
<http://www.springfield-or.gov/dpw/GlenwoodRefinementPlan.htm>

The City of Springfield requires a Discretionary Use Permit for any change or intensification of use, or construction that has a significant visual impact in the Willamette Greenway Overlay District, which is combined with a “Greenway Setback Line.”

Springfield implements Metro Plan Willamette River Greenway, River Corridors, and Waterways Element policies through the land use regulations of its existing, acknowledged Springfield Development Code 3.3-300 Willamette Greenway Overlay District.

The 2030 Plan implements the Metro Plan Willamette River Greenway, River Corridors, and Waterways Element goals, objectives and policies intended to protect, conserve, and enhance the natural, scenic, environmental, and economic qualities of river and waterway corridors through the following new 2030 Plan goals, policies and implementation measures:

The 2030 Comprehensive Plan Urbanization Element, Goal UG-4 states:

“As the City grows and as land develops, maintain and reinforce Springfield’s identity as a river-oriented community by emphasizing and strengthening physical connections between people and nature in the City’s land development patterns and infrastructure design.”

The 2030 Comprehensive Plan Urbanization Element, Policy 41 states:

“Protect, conserve, and enhance the natural, scenic, environmental, and economic qualities of the McKenzie and Willamette River and waterway corridors as Springfield grows and develops.”

The 2030 Comprehensive Plan Urbanization Element, Policy 42 states:

“Land use regulations and acquisition programs along river corridors and waterways shall take into account the concerns and needs of the community, such as recreation, resource protection, wildlife habitat, enhancement of river corridor or waterway environments, potential for public access, and opportunities for river-oriented urban development and infrastructure design. (Adapted from Greenway, River Corridors and Waterways Metro Plan D.2 p III-D-4)

The City’s 2030 Comprehensive Plan Urbanization Element, Policy 44 states:

The City of Springfield and Willamalane shall continue to cooperate in expanding water-related parks and other facilities, where appropriate, that allow access to and enjoyment of river and waterway corridors. (Adapted from Greenway, River Corridors and Waterways Metro Plan D.3, p III-D-4)

The City's 2030 Comprehensive Plan Urbanization Element, Policy 45 states:

New development that locates along river corridors and waterways shall be designed to enhance natural, scenic and environmental qualities of those water features. (Adapted from Greenway, River Corridors and Waterways Metro Plan D.4, p III-D-4)

2030 Plan Urbanization Element Policies 46, 47 and 52 direct planning efforts to provide public access to the Mill Race, Willamette River Greenway and the McKenzie River and to provide active transportation systems in new growth areas.

The City's 2030 Comprehensive Plan Urbanization Element, Policy 46 states:

"Continue efforts to restore, enhance and manage the Springfield Mill Race to fulfill multiple community objectives. Partner with Willamalane and Springfield Utility Board to provide public access to the Mill Race where appropriate. (Adapted from Greenway, River Corridors and Waterways Metro Plan D.4, p III-D-4)"

Springfield 2030 Comprehensive Plan Urbanization Element, Policy 47 states:

"Continue efforts to provide increased opportunities for public access to the Willamette River Greenway and the McKenzie River through comprehensive planning, development standards, annexation agreements, the land use permitting process, and through partnerships with Willamalane, Springfield Utility Board and property owners."

Springfield 2030 Comprehensive Plan Urbanization Element, Policy 52 states:

"Grow and develop the City in ways that maintain and improve Springfield's air quality to benefit public health and the environment."

- ***Prioritize and seek funding for mixed use land use district planning and multi-modal transportation projects that reduce reliance on single occupancy vehicles (SOVs) consistent with Springfield Transportation System Plan (TSP) Policy 1.2, 1.3 and 1.4.***
- ***Coordinate land use and transportation system planning for urbanizable lands at the refinement plan and/or Master Plan level to identify and conceptually plan alignments for locating multi – modal facilities.***
- ***Plan, zone and design transportation systems in the North Gateway and Mill Race Urban Holding Area - Employment districts to provide multi-modal transportation choices for district employees.***
- ***Promote the use of active transportation systems as new growth areas and significant new infrastructure are planned and developed.***

In addition to Springfield-specific 2030 Plan Urbanization Policies applicable to lands within the Springfield UGB, the Metro Plan Willamette River Greenway, River Corridors, and Waterway Element will continue to be applicable to Springfield, as specifically refined through adoption of policies in the Springfield Comprehensive Plan.

Metro Plan Environmental Design Element

Metro Plan Environmental Design Element II-D-6 states:

“The Environmental Design Element is concerned with that broad process which molds the various components of the urban area into a distinctive, livable form that promotes a high quality of life.

The Metro Plan must go beyond making the urban area more efficient and better organized to also ensure that the area is a pleasant, attractive, and desirable place for people to live, work, and play. The Environmental Design Element is concerned with how people perceive and interact with their surroundings. Perceptions of livability greatly differ between individuals; so, generalizations concerning this element need to be carefully drawn. Many different indicators of livability have been identified, such as the numbers of local educational, medical, and recreational facilities, and natural environmental conditions. Not all these indicators are directly concerned with environmental design, showing that the concept of livability is influenced by all elements of the Metro Plan. This element focuses on some of the features of the natural and built environment that affect the quality of life.

The metropolitan area is changing in ways that are far-reaching and diverse. Decisions that concern change have an effect on the form of the area. If we are to maintain a livable urban environment and realize the full potential of our desirable and distinctive qualities, daily decisions that concern change must be guided by environmental design principles, such as site planning, in combination with other planning policies.

Based on concerns related to energy conservation, environmental preservation, transportation, and other issues, increased density is desirable. This increases the need for effective, detailed environmental design in order to ensure a high quality of life and a high degree of livability in an increasingly dense urban environment.

This area is noted for the high degree of livability enjoyed by its residents. Environmental design is a process that helps to maintain and enhance these positive attributes.”

This Element has 3 Goals (III-E-1):

- *Secure a safe, clean, and comfortable environment which is satisfying to the mind and senses.*
- *Encourage the development of the natural, social, and economic environment in a manner that is harmonious with our natural setting and maintains and enhances our quality of life.*
- *Create and preserve desirable and distinctive qualities in local and neighborhood areas.*

Policy E-7 states:

“The development of urban design elements as part of local and refinement plans shall be encouraged.”

Policy E-9 states:

“Refinement plans shall be developed to address compatibility of land uses, safety, crime prevention, and visual impact along arterial and collector streets, within mixed-use areas. During the interim period before the adoption of a refinement plan, these considerations shall be addressed by cities in approving land use applications in mixed use areas by requiring conditions of approval where necessary.”

Springfield has previously adopted local urban design plans for the Downtown District and the Glenwood Phase One mixed use areas. Springfield addresses this policy as local district and neighborhood refinement plans are adopted. Springfield addresses this policy by implementing Springfield Development Code standards for new development through the land use approval process. 2030 Plan policies require additional refinement planning for new areas added to the UGB.

Conclusion Metro Plan Environmental Design Element: The 2030 Plan amendments are consistent with Metro Plan Environmental Design Element policies.

Statewide Planning Goal 1: Citizen Involvement

OAR 660-015-0000(1)

To develop a citizen involvement program that insures the opportunity for citizens to be involved in all phases of the planning process.

No amendments to acknowledged citizen involvement programs are proposed. The Springfield and Lane County have acknowledged land use codes that are intended to serve as the principal implementing ordinances for the *Metro Plan*. Chapter 5 of the SDC, *Metro Plan Amendments; Public Hearings*, prescribes the manner in which a Type II *Metro Plan* amendment must be noticed. Requirements under Goal 1 are met by adherence to the citizen involvement processes required by the *Metro Plan* and implemented by the Springfield Development Code, Chapter 5, Section 5.14-135, Eugene Code Section 9.7735, and Lane Code Sections 12.025 and 12.240.

Notice to DLCD was provided on December 31, 2009. Amended Notice to DLCD was provided on July X, 2016. Mailed notice to interested parties, parties of record, and property owners and residents within 500 feet of the proposed boundary change was mailed on August X, 2016.

Conclusion Goal 1: As described in the City's findings under Goal 9 and 14, the City provided ample opportunities for citizens to be involved in the 2030 planning process. The Record Index provides a complete list of citizen involvement activities over a multi-year period between 2007 and 2016. The CIBL/EOA Appendix D explains how community visioning informed the identification of community economic development objectives and strategies, and the assumptions used in the CIBL/EOA to determine employment land needs. The local record contains complete documentation of each public involvement activity conducted, including meetings, open houses, workshops, surveys, visioning sessions, work sessions, outreach to agencies and service providers, and public hearings. The City published recordings of the CIBL Stakeholder Committee meetings, meeting minutes, 2010 Planning Commission public hearing, and summaries of input received 2007-2016 on the City web site.

Add summary of 2016 process after the summer open houses and public hearing are completed.

Statewide Planning Goal 2: Land Use Planning

OAR 660-015-0000(2)

To establish a land use planning process and policy framework as a basis for all decision and actions related to use of land and to assure an adequate factual base for such decisions and actions.

The Metro Plan and Springfield 2030 Comprehensive Plan are the land use or comprehensive plans required by this goal; the Springfield Development Code and the Lane Code are the implementation measures required by this goal. Comprehensive plans, as defined by ORS 197.015(5), must be coordinated with affected governmental units. Coordination means that

comments from affected governmental units are solicited and considered. The CIBL/EOA provides an adequate factual base for decisions and action in regard to implementation of Goal 9 Economic Development on lands within the Springfield Urban Growth Boundary.

The current version of the *Metro Plan* was last amended in 2014 (DLCD File no. 003-14, Springfield Ordinance No. 6332; Eugene Ordinance No. 20545; and Lane County Ordinance No. PA 1313).

The 2030 Plan amendments are the next step in Springfield's process to adopt a City-specific comprehensive plan, in light of the evolving framework for land use planning in the Eugene-Springfield metropolitan area. As stated on page I-3 to I-4 of the *Metro Plan*:

"Oregon Revised Statute 197.304 (2007)

Historically, many provisions in the Metro Plan were based on a premise that Eugene and Springfield would continue to have a regional metropolitan urban growth boundary ("metropolitan UGB") that includes both cities and adjacent "urbanizable" areas of Lane County. However, ORS 197.304, adopted by the Oregon Legislature in 2007, requires Eugene and Springfield to divide the metropolitan UGB into two city-specific UGBs. Each city is also required to demonstrate that its separate UGB includes sufficient land to accommodate its 20-year need for residential land consistent with Statewide Planning Goal 10 (Housing) and Goal 14 (Urbanization). These statutory mandates implicitly require each city to also adopt a separate 20-year population forecast. ORS 197.304 allows the cities to take these separate actions "[n]otwithstanding . . . acknowledged comprehensive plan provisions to the contrary."

The ORS 197.304 mandates are being carried out by the two cities and Lane County through a series of incremental actions over time rather than through a Metro Plan Update process. Some of the land use planning that has historically been included in the Metro Plan will, instead, be included in the cities' separate, city-specific comprehensive plans. This does not diminish the fact that the cities and the county remain committed to regional problem-solving.¹⁰

The three jurisdictions anticipate that the implementation of ORS 197.304 will result in a regional land use planning program that continues to utilize the Metro Plan and regional functional plans for land use planning responsibilities that remain regional in nature. City-specific plans will be used to address those

¹⁰ In addition to the continued collaboration through some regional land use plans, such as the regional transportation system plan and the regional public facilities and services plan, the three jurisdictions are committed to working collaboratively in other ways and through other initiatives, such as the Regional Prosperity Economic Development Plan jointly approved in February, 2010.

planning responsibilities that the cities address independently of each other."
(emphasis added)

"In addition to the continued collaboration through some regional land use plans, such as the regional transportation system plan and the regional public facilities and services plan, the three jurisdictions are committed to working collaboratively in other ways and through other initiatives, such as the Regional Prosperity Economic Development Plan jointly approved in February, 2010."
(emphasis added)

Each city is taking a different approach to, and is on a different time line for, establishing its own UGB, 20-year land supply and city-specific comprehensive land use plans. As this incremental shift occurs, the Metro Plan will be amended several times to reflect the evolving extent to which it continues to apply to each jurisdiction. During this transition, the three jurisdictions will also continue to work together on any other Metro Plan amendments needed to carry out planning responsibilities that continue to be addressed on a regional basis. (emphasis added)

ORS 197.304 allows the cities to adopt local plans that supplant the regional nature of the Metro Plan "[n]otwithstanding . . . acknowledged comprehensive plan provisions to the contrary." As these local plans are adopted, Eugene, Springfield and Lane County wish to maintain the Metro Plan as a guide that will direct readers to applicable local plan(s) when Metro Plan provisions no longer apply to one or more of the jurisdictions. Therefore, when Eugene or Springfield adopts a city-specific plan to independently address a planning responsibility that was previously addressed on a regional basis in the Metro Plan, that city will also amend the Metro Plan to specify which particular provisions of the Metro Plan will cease to apply within that city.¹¹ Unless the Metro Plan provides otherwise, such Metro Plan provisions will continue to apply within the other city. If the other city later adopts its own city-specific plan intended to supplant the same Metro Plan provisions, it may take one of two actions. That city will either amend the Metro Plan to specify that the particular provisions also cease to apply within that city or, if the provisions do not apply to rural or urbanizable areas within the Metro Plan boundary, to simply delete those particular Metro Plan provisions. (emphasis added)

¹¹ As more specifically explained in Chapter IV of the Metro Plan, one city with co-adoption by Lane County may amend the *Metro Plan* to specify which particular *Metro Plan* provisions no longer apply within the unincorporated (urbanizable) portions of its UGB. The other city is not required to co-adopt such a *Metro Plan* amendment. See Chapter IV.

To better enable the jurisdictions to amend the Metro Plan as required by ORS 197.304, the procedures for amending the Metro Plan, provided in Chapter IV, were revised in 2013. The Eugene City Council, the Springfield City Council, and the Lane County Board of Commissioners adopted identical amendments to Chapter IV of the Metro Plan on November 18, 2013:

Eugene City Council, Ordinance No. 6304

Springfield City Council, Ordinance No. 20519

Lane County Board of Commissioners, Ordinance No. PA 1300"

As explained in Metro Plan pages I-8 to I-9:

"Relationship to Other Plans, Policies, and Reports

The Metro Plan is the basic guiding land use policy document for regional land use planning. As indicated in the Purpose section, above, the region also utilizes: (a) city-wide comprehensive plans; (b) functional plans and policies addressing single subjects throughout the area, including the Eugene-Springfield Public Facilities and Services Plan (Public Facilities and Services Plan) and the regional transportation system plan; and (c) neighborhood plans or special area studies that address those issues that are unique to a specific geographical area. In all cases, the Metro Plan is the guiding document for regional comprehensive land use planning and city-specific plans may be adopted for local comprehensive land use planning. Refinement plans and policies must be consistent with applicable provisions in the Metro Plan or the applicable local comprehensive plan. Should inconsistencies occur, the applicable comprehensive plan is the prevailing policy document. The process for reviewing and adopting refinement plans is outlined in Chapter IV.
(emphasis added)

The City coordinated with the affected units of government (Eugene and Lane County) in adoption the 2014 Metro Plan "enabling" amendments. Staff forwarded the 2030 Metro Plan text amendments in Ordinance Exhibit D to Eugene planning staff. Staff coordinated with Eugene and Lane County on the boundary description. Staff coordinated closely with Lane County staff and legal counsel to prepare the 2030 Plan Urbanization Element policies, plan designations and zoning maps. Eugene and Lane County staff participated in the CIBL Technical Advisory Committee, along with representatives from Oregon Department of Transportation, Oregon Economic and Business Development Department, and the Department of Land Conservation and Development. Staff conducted outreach to affect government agencies throughout the multi-year planning process, as documented in the local record.

The 2030 Plan amendments (Ordinance Exhibit D) amend Metro Plan text to clearly state where the new Springfield 2030 Plan policies supplant, add or delete certain Metro Plan policies and findings.

The Metro Plan was amended to adopt the 2030 Plan amendments after public meetings, public workshops and joint hearings of the Springfield and Lane County Planning Commissions and Elected Officials.

Goal 2 Conclusions. The 2030 Plan amendments adopt the CIBL/EOA as the Technical Supplement to the Springfield 2030 Comprehensive Plan Economic Element to establish the adequate factual base for decisions and actions in regard to implementation of Goal 9 Economic Development on lands within the Springfield Urban Growth Boundary.

The 2030 Plan amendments provide consistent and coordinate comprehensive planning to implement Metro Plan policies and Goal 2.

Statewide Planning Goal 5: Natural Resources, Scenic and Historic Areas, and Open Spaces

OAR 660-015-0000(5)

To protect natural resources and conserve scenic and historic areas and open spaces.

660-024-0020 (1)(c) Adoption or Amendment of a UGB

“(1) All statewide goals and related administrative rules are applicable when establishing or amending a UGB, except as follows:

(c) Goal 5 and related rules under OAR chapter 660, division 23, apply only in areas added to the UGB, except as required under OAR 660-023-0070 and 660-023-0250;”

Goal 5 and related rules under OAR chapter 660, division 23 are applicable to the proposal only in the areas added to the UGB. [OAR 660-024-0020 (1)(c)]

OAR 660-023-0070 Buildable Lands Affected by Goal 5 Measures

Measures to protect significant resource sites inside the UGB have been factored into Springfield’s CIBL/EOA land inventory process. Significant Wetlands and Riparian Resources — including development setbacks — are identified as “Absolute Constraints” in the City’s

Goals 9, 10 and 14 inventories and have been deducted from the buildable land inventory and calculation of suitable acres on as site. Springfield’s amendment of the UGB adds suitable, unconstrained land based on the inventory and site needs analysis.

OAR 660-023-0250 Applicability

“(1) This division replaces OAR 660, Division 16, except with regard to cultural resources, and certain PAPAs and periodic review work tasks described in sections (2) and (4) of this rule. Local governments shall follow the procedures and requirements of this division or OAR 660, Division 16, whichever is applicable, in the adoption or amendment of all plan or land use regulations pertaining to Goal 5 resources...”

The proposal does not adopt plan or land use regulations pertaining to Goal 5 resources. OAR 660-023-0250(1) is not triggered.

“(3) Local governments are not required to apply Goal 5 in consideration of a PAPA unless the PAPA affects a Goal 5 resource. For purposes of this section, a PAPA would affect a Goal 5 resource only if:

(a) The PAPA creates or amends a resource list or a portion of an acknowledged plan or land use regulation adopted in order to protect a significant Goal 5 resource or to address specific requirements of Goal 5;”

The proposal does not create or amend a resource list or a portion of an acknowledged plan or land use regulation adopted in order to protect a significant Goal 5 resource or to address specific requirements of Goal 5. OAR 660-023-0250(3)(a) is not triggered.

“(b) The PAPA allows new uses that could be conflicting uses with a particular significant Goal 5 resource site on an acknowledged resource list; or”

2030 Plan requires Goal 5 inventory updates for UGB expansion areas prior to approval of urban uses. The 2030 Plan does not allow new uses that could be conflicting uses with a particular significant Goal 5 resource site on an acknowledged resource list. Areas added to the UGB to meet employment land needs are designated “Urban Holding Area – Employment (UHA-E)” and zoned “Agriculture—Urban Holding Area (AG).” Although land is added to the City’s urbanizable area, the AG zoning district is a holding district that does not allow new urban uses that could be conflicting uses with a particular significant Goal 5 resource site on an acknowledged resource list. The AG zoning district allows a subset of uses that are currently permitted under the existing Lane County Exclusive Farm Use (EFU) zoning. OAR 660-023-0250(3)(b) is not triggered.

“(c) The PAPA amends an acknowledged UGB and factual information is submitted demonstrating that a resource site, or the impact areas of such a site, is included in the amended UGB area.”

The 2030 Plan amendments amend the acknowledged Springfield UGB. The City’s GIS-based analysis of the amended UGB area and factual information from adopted City and County ordinances indicates that inventoried Goal 5 resource sites are present in the amended UGB areas. Therefore, for the purposes of this section, the 2030 UGB and associated PAPA “would affect a Goal 5 resource.” [OAR 660-023-0250(3)(c)]

Inventoried Goal 5 Resources: Metro Natural Resources Study 2005-2006 (completed under previous Period Review). Springfield Ordinance 6085 (2004) adopted criteria for determining significant Goal 5 riparian or wildlife habitat sites within the City limits and adopted an updated Goal 5 inventory within the Springfield city limits. The ordinance adopted Exhibit A (criteria), and Exhibit B (list and 6 map tiles entitled Springfield Inventory of Natural Resource Sites within the Springfield city limits). Ord. Section 3 states: “the inventory of significant Goal 5 resources for the Springfield city limits shall include, and be limited to, the resource sites shown for that area on the following documents: April 12, 1978 Sand and Gravel Working Paper; April 12, 1978 Scenic Sites Working Paper; the April 12, 1978 Willamette River Greenway Working Paper; the April 12, 1978 Archaeological Sites Working Paper; the 1998 Springfield Local Wetland Inventory; the Washburne Historic Landmark District; the Historic Landmark Inventory; and the 1992 Gateway Historic resources Survey.”

Springfield Ordinance 6150 (2005) and Lane County Ordinance PA1233 (2006) adopted the Springfield Natural Resources Study — including the Springfield Inventory of Natural Resource Areas as an element of previous *Metro Plan* Periodic Review Task 7 and the Springfield Local Wetland Inventory as an element of previous *Metro Plan* Periodic Review Task 5. The study addressed resources located within the City of Springfield and its urbanizable area. The Study was prepared to complete the inventory process described in OAR 660-023-0030 and the ESEE decision process described in OAR 660-023-0040 and included implementing regulations to achieve Goal 5 compliance. The Springfield Development Code was amended concurrently to add protection measures for identified natural resource areas (wetlands and riparian). The adopting ordinance also included the following text:

“WHEREAS, in addition to the inventories of riparian, upland wildlife habitat and wetland sites referred to above, the following inventories make up the entire inventory of significant Goal 5 resources within the City of Springfield: the April 12, 1978 Sand and Gravel Working Paper; April 12, 1978 Scenic Sites Working Paper; the April 12, 1978 Willamette River Greenway Working Paper; the April 12, 1978 Archaeological Sites Working Paper; the December 1, 1976 list of historic landmarks, and the Water-quality Limited Waterways Map.”

Springfield and Lane County have previously acknowledged Goal 5 inventories and programs to achieve Goal 5 within the existing UGB. The existing Metro Plan Natural Resources Study inventoried resources in the UGB expansion areas because those lands were within the Metro Plan boundary when the inventories were conducted and acknowledged.

Springfield has existing Division 23-compliant programs in place to achieve Goal 5, consistent with OAR 660-023-0050 and those programs will apply to the land added to the UGB.

Springfield Development Code 4.3-117 Natural Resource Protection Areas contains the City’s development standards for protecting natural resources to implement Goal 5, to safeguard fish and wildlife habitat and to implement the goals and policies of the *Metro Plan*. The code provisions are applicable to “land within the wetland and/or riparian resource boundary and the development setback area, specifically locally significant protected wetlands, listed in the Local Wetland Inventory and shown on the Local Wetland Inventory Map; locally significant protected riparian areas, listed in the Springfield Inventory of Natural Resources Sites and shown on the Natural Resources Inventory Map.

When the UGB amendment is acknowledged, land use decisions for the urbanizable land added to the UGB will be subject to the development standards in SDC 4.3-117 for protecting natural resources to implement Goal 5, to safeguard fish and wildlife habitat and to implement the goals and policies of the *Metro Plan*.

Springfield Development Code 4.3-115 Water Quality Protection contains the City’s development standards for protecting riparian areas along watercourses shown on the Water Quality Limited Watercourses (WQLW) Map, as explained in the City’s findings under Goal 6. When the UGB amendment is acknowledged, the urbanizable land added to the UGB will be subject to the development standards for protecting riparian areas in SDC 4.3-115.

OAR 660-023-0250(3)(c) Conclusion: Goal 5 is applicable to the proposal pursuant to OAR 660-023-0250(3)(c). Goal 5 is applicable to the proposal only in the areas added to the UGB pursuant to 660-024-0020 (1)(c).

Goal 5 Resources within the UGB expansion areas. The following inventoried **Goal 5 resources** and **Water Quality Limited Waterways*** are located within or in proximity to Springfield’s proposed UGB expansion areas:

Goal 5 Resources located within or in proximity to Springfield’s proposed UGB expansion areas		
<i>Wetland Resources</i>	<i>Location/Expansion Area</i>	<i>Goal 5 Inventory</i>
M 01 wetland	Ruff Park	Goal 5 Local Wetland Inventory
W 01a Mill Race	Mill Race	Goal 5 Local Wetland Inventory

M20 Maple Island Slough	North Gateway	Goal 5 Local Wetland Inventory
LC NWI ID 4650, 4642	North Gateway	Goal 5 National Wetland Inventory
LC NWI ID 6349, 6357, 6363, 6373, 6263, 6272, 6274, 6302, 6409, 6419, 6381, 6415, 6420, 6405, 6450, 6466	Mill Race	Goal 5 National Wetland Inventory
Waterways & Riparian Resources	Location/Expansion Area	Protection Status as Goal 5 and/or Water Quality Limited Waterways (WQLW)¹² (for WQLW see Goal 6 findings)
S03 Mill Race A, natural	Mill Race	Goal 5 and Local WQLW
Middle Fork Willamette River	Mill Race	Goal 5 and Oregon WQLW >1000CFS
Gorrie Creek	Mill Race	Goal 5 and Local WQLW
Quarry Creek	Mill Race	Local WQLW
S17 Maple Island Slough ¹³	North Gateway	Goal 5 and Local WQLW
McKenzie River	North Gateway	Goal 5 and Oregon WQLW>1000CFS
S10 McKenzie Oxbow	Oxbow	Goal 5 and Oregon WQLW

¹² Springfield Ordinance No. 6021, adopted July 15, 2002 amends the SDC to reference the WQLW Map. The title of the ordinance includes the statement “adopting the water quality limited watercourse map”, yet ordinance Section 28 states “The Water Quality Limited Watercourse (WQLW) Map, August 2002 is hereby added by reference”. The definition in Chapter 6 of the Development Code for the Water Quality Limited Watercourses is “Those watercourses within the City and its urbanizing area that are specified on the WQLW Map” and that the standards for protecting watercourses in Section 4.3-115 only apply to those watercourses that are shown on the WQLW Map. The August 2002 WQLW map is the most recent adopted map for regulatory purposes.

¹³ On March 11, 2011, staff received a letter from Wicklund Trust (North Gateway site property owner) stating concern about the accuracy of maps in the adopted Goal 5 inventory depicting the location of natural resource site S-17 on the Wicklund Trust property. The letter contains documentation submitted to the Wicklund Trust’s attorney Jordan Schrader Ramis to describe the soils and vegetation of the land. The letter includes a “Summary of Wetland and Stream Reconnaissance” conducted in August 25-26, 2009 by Raedecker Associates. Based on the adopted inventory, information included in the Wicklund Trust letter, and the City’s GIS-based analysis of mapped resources and analysis of the site utilizing LiDAR remote sensing technology, a Goal 5 inventory for the Wicklund site in accordance with OAR 660-023-0030 and amendment of the Springfield Natural Resources Study will be required prior to approval of a plan amendment or zone change that permits urban development on the site, as described in Urbanization Element Policy x. The inventory process shall map the resource areas, determine significance, and adopt a list of significant resource sites as part of the comprehensive plan and land use regulations. More precise field surveys to locate top of bank and to monument riparian area setbacks are required prior to site plan approval and issuance of building permits.

Keizer Slough	Oxbow	Oregon WQLW
48 th Street Channel	Just east of Oxbow and Keizer Slough	Local WQLW
Cedar Creek	Lively Park, Ruff Park	Goal 5 and Local WQLW

Water Quality Limited Waterways (WQLW) shown on the Springfield WQLW map were included in the Goal 5 inventory of significant sites within the City of Springfield (Springfield Ordinance 6150). As shown in the City's Water Quality Limited Waterways Map, most of the inventoried WQLWs are located along the existing UGB or within the City Limits. WQLWs contain Oregon Division of State Lands "Essential Salmonid Habitat" Stream Designations. WQLWs are protected under the Water Quality Protection standards in Springfield Development Code 4.3-115. Natural Resource Protection Areas are protected under Springfield Development Code 4.3 –117 Natural Resource Protection Areas.

2030 Plan Urbanization Element Policy 47 states:

"Prior to approval of a plan amendment or zone change that permits urban development within the North Gateway or Mill Race District urbanizable lands, Prior to approval of a plan amendment or zone change that permits urban development within the North Gateway or Mill Race District urbanizable lands, the Springfield Local Wetland Inventory shall be updated in accordance with Statewide planning Goal 5 and Goal 5 administrative rules requirements."

2030 Plan Urbanization Element Policy 48 states:

"Prior to approval of a plan amendment or zone change that permits urban development within the North Gateway or Mill Race District urbanizable lands, the Springfield Natural Resources Inventory shall be updated in accordance with Statewide planning Goal 5 and Goal 5 administrative rules requirements and the Springfield Natural Resources Study shall be amended. The inventory process shall map the resource areas, determine significance, and adopt a list of significant resource sites as part of the comprehensive plan and land use regulations. More precise field surveys to locate top of bank and to monument riparian area setbacks are required prior to site plan approval and issuance of building permits."

2030 Plan Urbanization Element Policy 50 requires an update of the WQLW map to include the areas added to the UGB:

“The Springfield Water Quality Limited Waterways Map shall be updated to include the North Gateway and Mill Race Districts. Springfield’s implementation measures to maintain the City’s compliance with the Clean Water Act and other Federal resource protection mandates shall automatically apply to the lands included in the UGB though the provisions of the Springfield Development Code.”

“(4) Consideration of a PAPA regarding a specific resource site, or regarding a specific provision of a Goal 5 implementing measure, does not require a local government to revise acknowledged inventories or other implementing measures, for the resource site or for other Goal 5 sites, that are not affected by the PAPA, regardless of whether such inventories or provisions were acknowledged under this rule or under OAR 660, Division 16.”

Conclusion OAR 660-023-0250(4): Pursuant to OAR 660-023-0250(4), the City is not required to revise the Metro Natural Resources inventory acknowledged in 2005 or its Springfield Development Code Goal 5 protection implementation measures. Springfield Development Code Goal 5 and Water Quality Limited Waterway protection implementation measures will automatically be applied to protect inventoried resource sites when the UGB expansion is acknowledged and the lands become subject to the applicable Springfield Development Code provisions implementing Goal 5. Any subsequent changes to land use designations must comply with the applicable provisions of Goal 5 and interpretive rules.

“(5) Local governments are required to amend acknowledged plan or land use regulations at periodic review to address Goal 5 and the requirements of this division only if one or more of the following conditions apply, unless exempted by the director under section (7) of this rule...”(emphasis added)

The City is not in periodic review.

“(a) The plan was acknowledged to comply with Goal 5 prior to the applicability of OAR 660, Division 16, and has not subsequently been amended in order to comply with that division;”

Previously acknowledged Metro Natural Resources Inventory and land use regulations comply with Division 16. The Metro Natural Resources Inventory was acknowledged in 2005, after applicability of OAR 660, Division 16 and has been amended in 2011 (Glenwood)¹⁴. OAR 660-023-0250(5)(a) is not triggered.

¹⁴ Springfield Ordinance 6265/ Lane County Ordinance PA1227 updated the Wetland Inventory, Inventory of Natural Resource Sites, and Natural Resource Study to include the Glenwood wetland and riparian sites.

“(b) The jurisdiction includes riparian corridors, wetlands, or wildlife habitat as provided under OAR 660-023-0090 through 660-023-0110, or aggregate resources as provided under OAR 660-023-0180; or...”

Springfield’s jurisdiction includes riparian corridors, wetlands, or wildlife habitat as provided under OAR 660-023-0090 through 660-023-0110, or aggregate resources as provided under OAR 660-023-0180, as identified in the previously acknowledged Metro Natural Resources Inventory and land use regulations that comply with Division 16. OAR 660-023-0250(5)(b) is triggered.

“(c) New information is submitted at the time of periodic review concerning resource sites not addressed by the plan at the time of acknowledgement or in previous periodic reviews, except for historic, open space, or scenic resources.”

Based on Lane County’s inventory and City analysis, the Springfield Goal 5 inventory will need to be updated to include the UGB expansion areas to address the boundary changes and to address resource sites (if any) in the expansion areas not addressed by the plan at the time of the last period review work task acknowledgement. For example, Lane County’s plan identifies National Wetland Inventory wetland resources within the UGB expansion areas. Prior to urbanization, the Local Wetland Inventory, Inventory of Natural Resource Sites, and Natural Resource Study will need to be updated for the areas added to the UGB. For example, the City conducted a similar process for the Glenwood area in 2011, as the Glenwood Refinement Plan amendments were being prepared. Thus the 2030 Plan includes Urbanization Element policies 47 and 48:

2030 Plan Urbanization Element Policy 47 states:

“Prior to approval of a plan amendment or zone change that permits urban development within the North Gateway or Mill Race District urbanizable lands, the Springfield Local Wetland Inventory shall be updated in accordance with Statewide planning Goal 5 and Goal 5 administrative rules requirements.”

2030 Plan requires a Local Wetland Inventory prior to urban development in UGB expansion areas. The following information is provided to explain why 2030 Urbanization Element Policy 47 is required. A wetlands inventory is a systematic survey of a fairly large geographic area to locate and map wetlands and classify them by type (for example, forested wetland or wet prairie). Many different inventory methods may be used, ranging from remote sensing (using aerial photography or satellite imagery) to on-the-ground surveys. The appropriate type of inventory method depends upon the intended uses, size of area to be covered, and available funds. There are two types of wetlands inventories that comprise the State Wetlands Inventory: the National Wetlands Inventory (NWI) and the Local Wetlands Inventory (LWI).

It is important to note that Lane County's plan identifies *National Wetland Inventory* wetland resources within the Springfield UGB expansion areas.

"The NWI was developed by the U.S. Fish and Wildlife Service and covers the entire country. It relies on high-altitude aerial photos, with limited field work. While the NWI is extremely useful for many resource management and planning purposes, its small scale, accuracy limitations, age (1980s), and absence of property boundaries make it unsuitable for parcel-based decision making."¹⁵ (emphasis added)

"To augment the NWI in urban and urbanizing areas where more detailed inventory information is needed, the Department of State Lands (DSL) developed guidelines and rules for Local Wetlands Inventories. An LWI aims to map all wetlands at least 0.5 acres or larger at an accuracy of approximately 25 feet on a parcel-based map. Actual map accuracy varies, and areas that could not be field verified will be less accurate. (The LWI is not a substitute for a detailed delineation of wetland boundaries.) The LWI maps and report provide information about the inventory area and the individual wetlands, including:

- *Total acreage of wetlands in the inventory area*
- *Acreage of each wetland type in the inventory area (e.g., 18 acres of forested wetland)*
- *Location, approximate size, and classification (type) of each wetland mapped*
- *A description of each mapped wetland*
- *A functions and condition assessment of all mapped wetlands*
- *All tax lots containing wetlands*

Once an inventory is completed and approved by DSL, there are certain requirements and implications:

An approved LWI is incorporated into the SWI and is made available by DSL to other agencies and the public. Wetlands and waterways, regardless of whether or not they are mapped, may be regulated under the State Removal-Fill Law. If ground-altering site work is proposed, a more precise wetland boundary may need to be located (a "delineation") to know where state permit requirements apply. Compliance with wetland and waterway regulations remains the responsibility of the landowner."

Under Statewide Planning Goal 5, Springfield must conduct an LWI and wetland function and condition assessment (in compliance with OAR 141-086-0180 to 0240 procedures for conducting LWIs), and then must identify locally significant

¹⁵ From http://www.oregon.gov/dsl/WETLAND/docs/fact2_2004.pdf

wetlands (LSW). DSL adopted rules for how LSWs are identified, using information from the LWI. A protection program is then adopted by the local government to further guide the management of LSWs.

An approved LWI must be used by the local government (in place of the NWI) for the Wetland Land Use Notification process (a local-state coordination process)." (emphasis added).

*"Local Wetland Inventories (LWI) provide a planning tool for balancing the protection of wetland functions that are of value to a community with community development needs. A LWI is also required as base information for city or county Goal 5 (Natural Resources) wetland protection programs. Advance information on the location of wetlands helps to avoid last-minute delays when beginning development or conducting real estate transactions."*¹⁶

2030 Plan Urbanization Element Policy 48 states:

"Prior to approval of a plan amendment or zone change that permits urban development within the North Gateway or Mill Race District urbanizable lands, the Springfield Natural Resources Inventory shall be updated in accordance with Statewide planning Goal 5 and Goal 5 administrative rules requirements and the Springfield Natural Resources Study shall be amended. The inventory process shall map the resource areas, determine significance, and adopt a list of significant resource sites as part of the comprehensive plan and land use regulations. More precise field surveys to locate top of bank and to monument riparian area setbacks are required prior to site plan approval and issuance of building permits."

"(6) If a local government undertakes a Goal 5 periodic review task that concerns specific resource sites or specific Goal 5 plan or implementing measures, this action shall not by itself require a local government to conduct a new inventory of the affected Goal 5 resource category, or revise acknowledged plans or implementing measures for resource categories or sites that are not affected by the work task."

Although the City is not in periodic review, the follow-up process to conduct the Local Wetland Inventory, Inventory of Natural Resource Sites, and Natural Resource Study updates in specific areas, including specific UGB expansion areas, prior to urbanization will not by itself require Springfield to conduct a new inventory of the affected Goal 5 resource category, or revise acknowledged plans or implementing measures for resource categories or sites that are not affected by the work task.

¹⁶ Ibid.

“(7) The director may exempt a local government from a work task for a resource category required under section (5) of this rule. The director shall consider the following factors in this decision:

(a) Whether the plan and implementing ordinances for the resource category substantially comply with the requirements of this division; and

(b) The resources of the local government or state agencies available for periodic review, as set forth in ORS 197.633(3)(g).”

The City is not in periodic review. However, if applicable, the City requests Director exemption under OAR 660-023-0250(7)(a) and (b). 2030 Urbanization Element policies 47 and 48 ensure that thorough, updated Goal 5 analysis will be conducted prior to zoning that allows urban development. To conduct the Goal 5 update prior to UGB amendment adoption would be premature and would be predetermining outcome of UGB Alternatives Analysis prior to completion of public review process, in violation of Goal 1. At a meeting on July 22, 2015 in Salem, DLCDC staff concurred with the City’s approach to Goal 5 compliance.

Springfield’s acknowledged plans to address Goal 5 are the Metro Natural Resources Study (UGB expansion areas) and Springfield Natural Resources Study (inside the existing UGB and NR features located along the boundary).

Springfield’s jurisdiction includes riparian corridors, wetlands, or wildlife habitat as provided under OAR 660-023-0090 through 660-023-0110 or aggregate resources as provided under OAR 660-023-0180; or (c) New information is submitted at the time of periodic review concerning resource sites not addressed by the plan at the time of acknowledgement or in previous periodic reviews, except for historic, open space, or scenic resources. Therefore, Subsection (5) is triggered, unless exempted by the director under section (7):

Springfield’s proposal addresses Goal 5 by amending the acknowledged plan. The proposed UGB amendment addresses Goal 5 through Springfield 2030 Urbanization Element policies and through implementation of existing land use regulations in the newly urbanizable areas added to the UGB.

OAR 660-023-0140 Groundwater Resources

Drinking water protection. The proposed UGB expansion areas comprises environmentally sensitive Drinking Water Source Areas that provide the City of Springfield’s drinking water. Development within Drinking Water Source Areas is subject to the Springfield Development Code Drinking Water Protection (DWP) Overlay District¹⁷, which will automatically apply when the UGB is amended. The DWP Overlay District “is established to protect aquifers used as

¹⁷ Springfield Development Code 3.3-200

potable water supply sources by the City from contamination.”¹⁸ The DWP Overlay District was established in 2000, “*establishing procedures and standards for the physical use of hazardous or other materials harmful to groundwater within TOTZ (time of travel zones) by new and existing land uses requiring development approval.*” The DWP Overlay District accomplishes protection “*by including methods and provisions to*

- *Restrict or prohibit the use of hazardous or other materials which are potential groundwater contaminants;*
- *Set standards for the storage, use, handling, treatment, and production of hazardous or other materials that pose a risk to the groundwater within TOTZ; and*
- *Review new or expanded uses of hazardous or other materials that pose a risk to groundwater.*”¹⁹²⁰

Springfield’s Drinking Water Protection program is recognized nationally as a successful model groundwater protection program. The Springfield Drinking Water Protection Plan was adopted May 17, 1999. The public water system²¹ serves over 10,000 Oregon citizens, thus the Springfield Drinking Water Protection Area is a “statewide significant resource” under the state land use program.²²

2030 Plan requires specialized drinking water protection standards to be developed for the North Gateway and Mill Race UGB expansion areas to protect the aquifer system. OAR 660-023-0140(1)(c) Groundwater Resources states that to “*protect significant groundwater resources*” means to *adopt land use programs to help ensure that reliable groundwater is available to areas planned for development and to provide a reasonable level of certainty that the carrying capacity of groundwater resources will not be exceeded.*” OAR 660-023-0140(1)(e) defines “Wellhead protection area” as “*the surface and subsurface area surrounding a water well, spring, or wellfield, supplying a public water system, through which contaminants are reasonably likely to move toward and reach that water well, spring, or wellfield.*”

A 2013 study of the Willamette Wellfield aquifer system provides explanation of the hydrologic connection between the aquifer and surface water in the proposed Mill Race District UGB expansion area.

“Given the unconfined nature of the aquifer and groundwater-level response in neighboring wells to changes in stream stage (CH2M HILL, 1982), the alluvial

¹⁸ Ibid, SDC 3.3-205

¹⁹ SDC 3.3-205B.

²⁰ SDC 3.3-215 states: “the degree of aquifer protection required in this Section is based on scientific and engineering considerations.”

²¹ As defined in OAR 660-023-0140(1)(d) “Public water system” is a system supplying water for human consumption that has four or more service connections, or a system supplying water to a public or commercial establishment that operates a total of at least 60 days per year and that is used by 10 or more individuals per day.

²² Nov. 29, 1999 letter DEQ Drinking Water Protection

aquifer is known to be in hydraulic connection with area surface water features. Those features include the Willamette River, Mill Race, Gorrie Creek, Quarry Creek, and the channels moving water to the west away from the filtration plant dewatering system. Streambed sediments are permeable and allow recharge to the alluvial aquifer. During periods when the surface water features (other than the Willamette River or Mill Race/Gorrie Creek) are dry, groundwater levels decline and wellfield capacity drops by nearly half (Western Groundwater Services, 2007). Groundwater that moves downgradient through the aquifer and is not captured by wells continues to move through the groundwater system discharging eventually to the Willamette River” (Golder Associates, 1995). [GSI Water Solutions, Inc. Geologist Technical Memorandum to Springfield Utility Board, October 29, 2013 paper, page 6]

The 2030 Plan expands the UGB and designates land as “Urban Holding Area- Employment.” Over the 20-year planning period, these lands will transition from rural to urban and be developed with urban industrial and other employment uses. Therefore, land use planning and development regulations applicable to the UGB expansion areas must be coordinated to ensure that Springfield’s Drinking Water Source Areas are protected.

2030 Plan Urbanization Element Policy 51 states:

“Grow and develop the City in ways that will to ensure the stability of Springfield’s public drinking water supply to meet current and future needs.

- ***Prior to City approval of annexation, land division or site development in the North Gateway and Mill Race UHA-E districts, the City — in partnership with Springfield Utility Board — shall conduct a Springfield Development Code Amendment process to prepare and apply specialized development standards that protect Drinking Water Source Areas to urbanizable lands designated UHA-E to ensure that new development contributes to a safe, clean, healthy, and plentiful community drinking water supply. The standards shall identify design, development, construction and best management processes appropriate and necessary to maintain aquifer recharge and protect drinking water quality and quantity. The standards shall also identify land use buffers appropriate and necessary to protect the Willamette Wellfield and the surface water features that are known to be in hydraulic connection with the alluvial aquifer.***
- ***Continue to Update the Springfield Comprehensive Plan and Springfield Development Code as new natural hazards information becomes available.***

- ***Encourage increased integration of natural systems into the built environment, such as vegetated water quality stormwater management systems and energy-efficient buildings.”***

Cultural and Historic Resources. The City reviewed SHPO records of cultural and historic resources within the expansion areas. There is one listing on the State’s Inventory of Historic Structures and Sites that is located in the Mill Race District. The site is shown to be ineligible. There are no listings for the Gateway area.

The City also reviewed Lane County’s list of Historic Structures and Sites (Lane Code 11.030, Updated 8/09/02). No structures or sites in the expansion areas were listed. Section 11.030 was subsequently removed from the Lane Code and “Historic Structures and Sites” are now defined in LC 11.300-10 as “Property currently listed in the National Register of Historic Places, established and maintained under the National Historic Preservation Act of 1966 (PL 89-655) (See LM 11.300) (Revised by Ordinance No. 10-82, Effective 7.9.82).”

No known Goal 5 resources cultural and historic resources will affected by this proposal.

Goal 5 Conclusion: The 2030 Plan amendments are in compliance with the applicable provisions of Goal 5.

Statewide Planning Goal 6: Air, Water and Land Resources Quality

OAR 660-015-0000(6)

To maintain and improve the quality of the air, water and land resources of the state

Goal 6 addresses compliance with federal and state environmental quality statutes, and how this compliance is achieved as development proceeds in relationship to air sheds, surface water features and groundwater resources, watershed basins and land resources. Springfield and the Eugene-Springfield Metropolitan area have existing programs in place to maintain and improve the quality of the air, water and land resources of the state.

Springfield’s Environmental Services Division (ESD) coordinates the City’s and Metro region’s compliance with applicable federal and state environmental quality statutes. ESD promotes and protects the public’s health, safety, and welfare by providing professional leadership in the protection of the local environment, responsive service to service recipients, and effective administration of the Regional Wastewater Program. ESD maintains compliance with Goal 6 through multiple programs including:

Water Resources Programs

- implementing the City's National Pollutant Discharge Elimination Systems (NPDES) stormwater discharge permit;
- coordinating the City's Endangered Species Act response;
- implementing the Stormwater Facilities Master Plan in conjunction with the City's Engineering Division.

Industrial Pretreatment Program

- regulating Significant Industrial Users (SIUs) of the regional wastewater system through permits;
- administrating the Pollution Management Practice programs.

Wastewater & Stormwater (Sewer & Drainage) Programs

- implementing local sewer user and stormwater rates and Systems Development Charges (SDCs);
- Public Education and Outreach to inform residents, businesses, and industries about urban stormwater runoff and pollution prevention;
- Public Participation to involve the public in the stormwater planning process;
- Illicit Discharge of Contaminants – to address illegal or illicit dumping of pollutants, whether accidental or intentional;
- Construction Site Runoff - working with contractors and developers where land clearing or construction may result in erosion, sedimentation, and soil loss;
- Post-Construction Erosion Control - ensures that new developments "build in" features (such as bio-swales) to continuously manage water quality in the future
- Good Internal Housekeeping - assessing the City's own maintenance practices and policies to ensure that work crews use the best practices to minimize pollution in their everyday tasks.

Wastewater generated in the Eugene/Springfield metropolitan area is cleaned at the [regional wastewater treatment facility](#). Pollution is controlled at the source through pretreatment programs located both in Springfield and Eugene. These regional industrial wastewater pretreatment programs are designed to protect the environment and the area's wastewater collection and treatment facilities by regulating potentially contaminated wastewater discharges from commercial and industrial activities.

Regulatory activities include developing pollutant limits for industrial discharges, responding to permit violations, and conducting industrial site inspections. The City of Springfield Pretreatment Program works closely with business and industry to control pollutants discharged into the wastewater treatment system; control spills and illicit discharges; and promote pollution prevention and recycling.

The City of Springfield provides Metropolitan Wastewater Management Commission (MWWC) administration, including: legal and risk management services; financial management and

accounting; budget and rate development; billing and customer service; public information, education, and citizen involvement programs. Springfield also provides long-range capital planning, and design and construction management for the regional facility. For more information visit the [MWMC](#) website.

Pursuant to the Intergovernmental Agreement between the City of Springfield and Lane County, Springfield ESD provides a subset of environmental services within the unincorporated urbanizable area.

Lane Regional Air Pollution Authority LRAPA and the U.S. Environmental Protection Agency (EPA) are responsible for monitoring and regulating air quality and air pollution discharges. The Lane Regional Air Protection Agency was created in 1968 to achieve and maintain clean air in Lane County, Oregon in a manner consistent with local priorities and goals. With the support of its member entities, which include Lane County and the cities of Eugene, Springfield, Cottage Grove and Oakridge, LRAPA carries out its mission to protect and enhance air quality through a combination of regulatory and non-regulatory programs and activities. The agency plays an active role in community development and planning, and works collectively with other local governments and community groups to help achieve federal Clean Air Act goals and objectives.

The EPA delegates authority to the Oregon Department of Environmental Quality (DEQ) to operate federal environmental programs within the state such as the federal Clean Air, Clean Water, and Resource Conservation and Recovery Acts. DEQ is responsible for protecting and enhancing Oregon's water and air quality, for cleaning up spills and releases of hazardous materials, for managing the proper disposal of hazardous and solid wastes, and for enforcing Oregon's environmental laws. DEQ staff use a combination of technical assistance, inspections and permitting to help public and private facilities and citizens understand and comply with state and federal environmental regulations.

The Oregon Department of State Lands is the administrative agency of the State Land Board responsible for sound stewardship of the state's lands, wetlands, waterways. It is the lead state agency responsible for the protection and maintenance of Oregon's wetlands resources through its administration of the state's removal-fill law, which protects Oregon's waterways and wetlands from uncontrolled alteration.

203 Plan Urbanization Element Policy 52 addresses air quality:

***“Grow and develop the City in ways that maintain and improve Springfield’s air quality to benefit public health and the environment.*”**

- ***Prioritize and seek funding for mixed use land use district planning and multi-modal transportation projects that reduce reliance on single occupancy vehicles (SOVs) consistent with Springfield Transportation System Plan (TSP) Policy 1.2, 1.3 and 1.4.***

- ***Coordinate land use and transportation system planning for urbanizable lands at the refinement plan and/or Master Plan level to identify and conceptually plan alignments for locating multi – modal facilities.***
 - ***Plan, zone and design transportation systems in the North Gateway and Mill Race Urban Holding Area - Employment districts to provide multi-modal transportation choices for district employees.***
 - ***Promote the use of active transportation systems as new growth areas and significant new infrastructure are planned and developed.”***

Goal 6 is addressed in Metro Plan Environmental Resources Element, pages III-C-15 toC-17 Air, Water and Land Resources Quality. The 2030 Plan amendments are consistent with these Metro Plan policies. The 2030 Plan amendments do not directly permit new land uses or changes in land uses and thus have no direct affect on or applicability to this goal. Any actions affecting land use or development that occur as a result of the 2030 Plan amendments are subject to the applicable goals, statutes and rules at the time those actions are undertaken.

Goal 6 Conclusion. Existing local, regional, state and federal programs and facilities exist to prevent discharges from threatening to violate, or violate applicable state or federal environmental quality statutes, rules and standards. The proposed 2030 plan amendments do not alter the City and region’s acknowledged compliance with Goal 6.

Statewide Planning Goal 7: Areas Subject To Natural Hazards

OAR 660-015-0000(7)

To protect people and property from natural hazards

The Metro Plan and the City’s development code are acknowledged to be in compliance with all applicable statewide land use goals, including Goal 7. Goal 7 requires local governments to address natural hazards within their comprehensive land-use plans. For the purposes of Goal 7, natural hazards include floods, landslides, earthquakes and related hazards, tsunamis, coastal erosion, and wildfires. Comprehensive plans address Goal 7 natural hazard planning through inventories, policies, mapping, ordinances and other implementing measures. Local land use plans guide development in hazardous areas with the overall goal of avoiding or minimizing risks to people and property from natural hazards.

Springfield has existing programs, policies, zoning overlay districts, and development standards to regulate development in areas subject to natural hazards to address threats posed by

natural hazards to people and property. The City of Springfield implements Metro Plan policies and Goal 7 as it relates to land use planning and development through the Springfield Development Code:

- Floodplain Overlay District SDC 3.3-400
- Hillside Development Overlay District SDC 3.3-500

New development within the UGB — including interim development and future development of urbanizable lands added to the UGB through adoption of the proposed 2030 plan UGB amendment — is subject to the Springfield Development Code, including all applicable overlay districts.

The 2030 Plan amendments do not alter existing development standards applicable in areas subject to natural hazards. The 2030 Plan amendments will be implemented through those acknowledged programs, policies, zoning overlay districts, and development standards.

The City's CIBL/EOA land inventory identified "floodway" and slopes >15% as "absolute constraints." These two development constraints are related to Goal 7 natural hazards. Portions of tax lots in the floodway and with slopes >15% were assumed unsuitable for the purposes of the inventory.

OAR 660-009-0005(2) provides the following definition of "development constraints:"

"Development Constraints" means factors that temporarily or permanently limit or prevent the use of land for economic development. Development constraints include, but are not limited to, wetlands, environmentally sensitive areas such as habitat, environmental contamination, slope, topography, cultural and archeological resources, infrastructure deficiencies, parcel fragmentation, or natural hazard areas.

The Administrative Rule provides a broad definition of constraints and leaves discretion for local governments in the application of the definition. Absolute constraints were deducted from the buildable portion of lots as they were determined to be factors that temporarily or permanently limit or prevent the use of land for economic development as defined in OAR 660-009-0005(2). For the purpose of the CIBL/EOA inventory, ECONorthwest used the following data sources were used to identify floodway and slope constraints:

- Floodway – Source: Army Corps of Engineers digital "FIRM" maps. File used: fld_way.shp
- Slopes over 15% - Source: 10 meter digital elevation model (DEM). File used: slopes_over_15.shp

Flood way and slopes greater than 15 percent are considered constrained for the purposes of the buildable lands inventory.

For the purposes of the UGB Boundary Location Alternatives Analysis, City staff used LCOG's Regional Data Base, FEMA maps, and the City's high resolution GIS topographic data (LIDAR) to identify and map constraints, and as explained in the City's findings under OAR 660-024-0060, the UGB Alternatives Analysis of potentially suitable employment land sites referenced the 2016 DOGAMI SLIDO maps of landslide hazards as part of the City's assessment of buildable lands, in addition to application of the slopes constraint.

Springfield's existing UGB and the proposed UGB contain land in the floodplain and floodway. As currently mapped by the Federal Emergency Management Agency (FEMA), all of the North Gateway UGB expansion area is within the 100-year flood plain of the McKenzie River. A portion of the North Gateway UGB expansion area is in the floodway. As currently mapped by the Federal Emergency Management Agency (FEMA), portions of the Mill Race UGB expansion area is within the 100-year flood plain of the Middle Fork Willamette River. Most of this land is in public ownership.

Metro Plan Policy C.31 states:

"When development is allowed to occur in the floodway or floodway fringe, local regulations shall control such development in order to minimize the potential danger to life and property. Within the UGB, development should result in in-filling of partially developed land. Outside the UGB, areas affected by the floodway and floodway fringe shall be protected for their agricultural and sand and gravel resource values, their open space and recreational potential, and their value to water resources." (III-C-16)

Springfield Development Code 3.3-420C. states that development is prohibited in the floodway unless certification by an engineer or architect is provided demonstrating that encroachments, including fill, new construction, substantial improvements, and other development will not result in any increase in flood levels during the occurrence of the base flood discharge. Replacement of structures already in the floodway is permitted if they are located in the same site and are the same size without the certification.

As shown in Ordinance Exhibit A, the 2030 Plan amendments designate the portion of the North Gateway UGB expansion area within the floodway as "Natural Resource."

Springfield and Lane County previously adopted implementing measures to reduce risk to people and property from flood hazards within Springfield's UGB. These measures are contained in Springfield Development Code 3.3-400 Floodplain Overlay District and are based on the Oregon Model Flood Damage Prevention Ordinance approved by the Federal Emergency Management Agency (FEMA).

Springfield Development Code 3.3-420A. and B. state that development may occur in areas of special flood hazard if certain development standards for construction of buildings and streets are met.

Springfield Development Code 3.3-420D. states that the cumulative effect of any proposed development, when combined with all other existing and anticipated development, shall not increase the water surface elevation of the base flood more than 1 foot at any point.

Urban and urbanizable land within all areas of special flood hazard as mapped by FEMA is subject to the Floodplain Overlay District development standards (Springfield Development Code 3.3-400 Floodplain Overlay District) in place at the time development occurs.

Landslide hazards. The UGB expansion avoids sloped lands because the needed employment site characteristics are sites with flat topography.

As recommended in Goal 7 Guideline B.2. Springfield requires site-specific reports, appropriate for the level and type of hazard (e.g., hydrologic reports, geotechnical reports or other scientific or engineering reports) prepared by a licensed professional to be submitted with development requests in high hazard areas. Such reports evaluate the risk to the site as well as the risk the proposed development may pose to other properties.

Metro Plan Policy C.32 Local governments shall require site-specific soil surveys and geologic studies where potential problems exist. When problems are identified, local governments shall require special design considerations and construction measures to be taken to offset the soil and geologic constraints present, to protect life and property, public investments, and environmentally-sensitive areas.

Springfield and Lane County previously adopted land use regulations to regulate the development of buildings and streets in hillside areas. These existing implementing measures in Springfield Development Code 3.3-500 Hillside Development Overlay District regulate development to ensure that development minimizes the potential for earth movement and resultant hazards to life and property and provides adequate access for emergency services.

Hillside Development Overlay District standards are applicable in residential zoning districts above 670 feet in elevation OR to development areas below 670 feet in elevation where any portion of the development area exceeds 15 percent slope. The City requires special reports (Geotechnical Report, Grading Plan report, Vegetation and Revegetation Report, Verification of Slope and Grade Percentages, a Development Plan report), special engineering requirements, and fire protection requirements for development approvals in these areas.

Development of this land is subject to Springfield Development Code 3.3-500 Hillside Development Overlay District standards.

The cities of Eugene and Springfield updated the *Multi-jurisdictional Natural Hazards Mitigation Plan* (NHMP) in 2014 to identify natural hazard preparedness. This work was performed in partnership with the Oregon Partnership for Disaster Resilience with funding from the Federal Emergency Management Agency (FEMA) Pre-Disaster Mitigation Grant Program. The natural hazards mitigation plan provides the Springfield community with a set of goals, action items, and resources designed to reduce risk from future natural disaster events.

The City and its Lane Livability Consortium partners recently conducted a planning process funded by a HUD Livable Communities grant to increase community resiliency. A resilient community is one that understands and is prepared for natural hazards and other uncertainties. Preparation starts with an understanding of vulnerabilities. The Lane Livability Consortium toolkit presents tools and results for assessing vulnerability. The findings of the completed assessment are used to inform natural hazards planning and other planning, risk management, and investment decisions.

The *Eugene Springfield Multi-Jurisdictional Emergency Operations Plan* is an all-hazards plan which outlines how the cities of Eugene and Springfield will prepare for and respond to emergencies. The purpose of the plan is to establish a comprehensive approach to protect the life, safety and health of the community. The Basic Plan describes how the cities' emergency management systems are organized and provides a framework for collaboration and coordination in order to provide the most efficient and effective use of resources during emergencies and major disasters. The Basic Plan also supports and facilitates emergency management coordination at the federal, state, and county levels.

Goal 7 Conclusion: Springfield 2030 Comprehensive Plan policies and the existing implementing measures contained in the Springfield Development Code 3.3-400 Floodplain Overlay District have been adopted by Springfield and Lane County to reduce risk to people and property from natural hazards. The proposal addresses flood hazards in compliance with Goal 7. Springfield 2030 Comprehensive Plan policies and the existing implementing measures contained in the Springfield Development Code 3.3-500 Hillside Development Overlay District have been adopted by Springfield and Lane County to reduce risk to people and property from natural hazards. The 2030 Plan amendments are in compliance with Goal 7.

Statewide Planning Goal 8: Recreational Needs

OAR 660-015-0000(8)

To satisfy the recreational needs of the citizens of the state and visitors and, where appropriate, to provide for the siting of necessary recreational facilities including destination resorts.

Goal 8 requires planning to meet recreation needs “now and in the future” by governmental agencies having responsibility for recreation areas, facilities and opportunities: (1) in coordination with private enterprise; (2) in appropriate proportions; and (3) in such quantity,

quality and locations as is consistent with the availability of the resources to meet such requirements. Goal 8 requires State and federal agency recreation plans to be coordinated with local and regional recreational needs and plans. Goal 8 guidelines recommend inventories to determine recreation needs in the planning area,” based on adequate research and analysis of public wants and desires.” “Long range plans and action programs to meet recreational needs should be developed by each agency responsible for developing comprehensive plans.”

Metro Plan IIIH Parks and Recreation Facilities Element policy H.2 states:

“Local parks and recreation plans and analyses shall be prepared by each jurisdiction and coordinated on a metropolitan level. The park standards adopted by the applicable city and incorporated into the city’s development code shall be used in local development processes.” (Page III-H-4)

Springfield’s acknowledged Goal 8 Comprehensive Plan element is the Willamalane Park and Recreation Comprehensive Plan.

Public land UGB amendment. The 2030 Plan amendments expand the UGB to encompass certain existing publicly-owned lands, parks, open space and public facilities that are currently located outside of the UGB. The purpose of the public land expansion is to plan designate and zone those lands to protect critical publicly-owned natural resources, parks and facilities therein and to facilitate the efficient planning and management of these lands to benefit Springfield’s residents. Bringing these public lands owned by the City, Willamalane Parks and Recreation (the City’s park and recreation service provider agency) and Springfield Utility Board into the UGB recognizes the need to provide urban services — including Policing and Fire and Life Safety services to protect the health, safety and welfare of the public. The 2030 Plan Public Land, Parks and Open Space UGB expansion includes:

- Certain SUB/City public land including Springfield Utility Board’s Willamette Well Field drinking water source area and drinking water treatment facility south of South 28th Street and the Springfield Mill Race as mapped and listed in Ordinance Exhibit A; and
- Certain Willamalane Parks and Open Space lands as mapped and listed in Ordinance Exhibit A.

Willamalane Park and Recreation District (WPRD) is designated in the Eugene-Springfield Metropolitan Area General Plan as the park and recreation service provider for Springfield and its urbanizable area. Willamalane is a special service taxing district with the authorization to purchase, develop and maintain park facilities, but it has no authority or obligation for Goal 8 compliance; that responsibility lies with the City of Springfield after coordinating with the Park District.

Willamalane owns 783 acres of land (recent acquisitions not included), 37 facilities, seven community recreation and support facilities, and three undeveloped properties in the greater Springfield area. The planning area for Willamalane's 20-year Park and Recreation Comprehensive Plan is generally defined by Springfield's urban growth boundary (UGB). There are a few minor exceptions to this circumstance where the district boundary is outside the UGB. In those cases the Willamalane's planning area is defined by the district boundary. In addition, the district's boundary generally coincides with the Springfield city limits, but there are some instances where the district boundary is outside the city limits and UGB. Developed areas annexed by the City of Springfield are automatically annexed to the District.

Park and Recreation Community Needs Assessment. As part of the update to Willamalane's Park and Recreation Comprehensive Plan (Comprehensive Plan) an extensive community needs assessment was completed.²³ The Community Needs Assessment included public involvement activities such as surveys and workshops in which community input was solicited from a range of cohort groups. Information on parks and facilities, recreation services, and maintenance and operations was gathered to identify future needs for park and recreation services and infrastructure to meet a growing population.

The district population forecast is the same as the forecast used by the City of Springfield for the residential buildable lands study. Over the next 20 years, the population is projected to increase by 22 percent within the Willamalane planning area. As such, Willamalane will have to increase services, parks and facilities just to maintain the current level of service for the planning area.

Willamalane uses a parkland standard of 14.00 acres per 1,000 residents. Based on this standard, 160 additional acres of parkland are currently needed. By 2030, that total increase to 364 acres. The future parkland need of approximately 364 acres includes 68 acres of Neighborhood Parks, 102 acres of Community Parks, and 194 acres of Natural Area.

Willamalane Comprehensive Plan Map 2 lists proposed park and recreation projects. In the proposed Mill Race UGB expansion area, the following park projects are proposed:

- establishing Georgia Pacific Park as a natural area;
- establishing Clearwater Park as a special use park;
- completion of the Middle Fork multi-use path; and
- construction of the Millrace multi-use path.

The proposed UGB expansion will also include the following Willamalane properties in north Springfield:

- the Oxbow;
- Lively Park; and

²³ Willamalane Park and Recreation Comprehensive Plan, Appendix A

- Ruff Park.

There are five (5) existing parks currently outside the existing UGB that Willamalane has requested to include within the UGB. These parks are:

1. Weyerhaeuser-McKenzie Natural Area Park (Tax Lots 17022900002901, 1702300000401). These tax lots are approximately 55 acres in size. The City of Springfield transferred this property to Willamalane in October of 2013. This natural area is one of a few locations in Springfield that offers potentially ADA accessibility to the McKenzie River. Currently the site is improved with an informal parking area, an internal access road and bridge, and a well field operated by Springfield Utility Board. Willamalane has plans to improve the area with a formal parking area and universal access to the water. These plans are consistent with the *McKenzie River Oxbow Natural Area Master Plan* (the master plan for this natural area) as approved by the City of Springfield on June 18, 2001. Willamalane has plans to complete restoration of the property consistent with recommendations in the Master Plan. In addition, the use of this property as a natural area park and creating an accessible connection to the McKenzie River is consistent with the Willamalane Comprehensive Plan and its Community Needs Assessment.
2. Jack B. Lively Memorial Park (Lively Park) (Tax Lot 1702270001101). This park is a community park and is approximately 32 acres in size. A portion of the park is currently outside the UGB. The park is improved with SPLASH, a regional recreational pool facility, a playground, basketball court, sand volleyball court, walking trails, two picnic shelters and a dog park. The tax lot proposed to be included in the UGB is 9.74 acres in size and currently contains soft-surface walking trails, a footbridge, and the north portion of the dog park, consistent with the 2005, Lively Park Master Plan. Willamalane does not have any plans to further develop this area. The existing trail system on the 9.74 acre parcel is consistent with the Jack B. Lively Memorial Park Master Plan and the Willamalane Comprehensive Plan and Community Needs Assessment to provide additional opportunities for walking.
3. Ruff (Wallace M Jr.) Memorial Park (Tax Lots 1702270001502, 1702341115500). This park is a special use park and is 9.79 acres in size. It is located at 1161 66th Street in the Thurston area of Springfield. The park can be accessed from 66th Street and via a pedestrian path from Jacob Lane, which is to the south of the park. The park is currently improved with walking trails, extensive planting of Magnolia trees, and a foot bridge over Cedar Creek. In the spring of 2013 Willamalane acquired Tax Lot 1702341115500, which is 6.1 acres in size and is south of the existing Ruff Park. Although Willamalane does not currently have plans to develop this newly acquired land, any future development within the park, including the panhandle portion will be consistent with the park standards for special use parks per the Willamalane

Comprehensive Plan and the Ruff Park master plan. Currently the park serves the residents within Levi Landing subdivision, which is immediately south of the park and within the UGB. Since Ruff Park serves the residents in the UGB, it should be in the UGB

4. Clearwater Park (Tax Lots 1802080000300, 1802080000400, 1802080000500, 1802080000600). This park is a special use park and is approximately 66 acres in size. The Park has been undergone many changes in the last 3-5 years. It was recently upgraded with a new boat ramp/landing, parking, restroom, park host site, and soft surface trails. The inlet and new channel for the Springfield Mill Race was developed in 2010. It is also the eastern trailhead for the 4-mile Middle Fork Path. Future use in the park is planned to include archery range, 9-hole disc golf, a nature play-ground, and additional soft surface trails. The park offers a place for recreating with family and friends and connecting with nature. The combination of the Middle Fork Willamette River, Springfield Mill Race and their diverse habitat types, presents an opportunity to enhance natural areas, water quality and wildlife habitat while concurrently providing outdoor education and recreation amenities for the people of Springfield. This is a unique destination in south Springfield.
5. Georgia-Pacific Park. This park is approximately 125 acres in size and is classified as a natural area park. The majority of Georgia-Pacific Park is already located within the UGB. Of the 125 acres, approximately 12 acres is outside the UGB. It is jointly owned by SUB, City of Springfield and Willamalane. Plans include developing the Mill Race Path through the park, connecting to the Middle Fork Path. The Comprehensive Plan, and agreements with SUB and the City, calls for the joint development of a management plan and master plan for the park. Having the entire park included in the UGB will facilitate a joint management approach to the park. Besides developing a portion of the Mill Race Path within Georgia-Pacific Park, Willamalane has no additional development plans. Willamalane staff has conceptualized this area for soft surface trails, and habitat restoration. This is a unique destination in south Springfield. By including this entire property in the UGB, the City is increasing Willamalane's service area within the UGB and within the City's jurisdiction, which is consistent with Willamalane being the park and recreation service provider for the City.

By including these properties within UGB, the City is increasing Willamalane's service area within the UGB and within the City's jurisdiction, which is consistent with Willamalane being the park and recreation service provider for the City.

By incorporating both Clearwater Park and all of Georgia-Pacific Park into the UGB, the City of Springfield incorporates a regional path system within its jurisdiction. The Middle Fork Path and the Mill Race Path (once completed), will be an eight mile multi-use path that connects downtown to the Middle Fork Willamette River.

The City is bringing into its jurisdiction an increased amount of natural area parks that offer the community the opportunity to access nearby waterways, unique vegetative habitats, and an expanding network of trails and paths.

The UGB line truncates several of these Parks: Lively, Ruff, G-Pacific Park. Currently, these portions of the parks are outside the UGB and Metro Plan boundary and are subject to the Lane Rural Comprehensive Plan and Lane Code. Amending the UGB so that the entire park is within the Metro Plan boundary and Springfield UGB facilitates consistent and efficient comprehensive planning and park management considerations.

Once within the UGB, it is anticipated that the public safety of the parks may increase since the City of Springfield will have planning jurisdiction over these parks and could provide for quicker response time for emergency services compared to County enforcement and emergency services.

The proposed UGB expansion provides a significant opportunity to meet the parkland need for existing and future residents and workers in Springfield, as well as the public at large.

In 2011, Springfield Ordinance 6268 was adopted and acknowledged. The ordinance adopted the Springfield UGB and the Springfield Residential Land and Housing Needs Analysis (RLHNA). The RLHNA identified a deficit of 300 acres of parkland.

The current, acknowledged Springfield UGB only partially addressed land needed for parks, open space and public facilities. Thus, the current UGB does not provide sufficient land for parks and open space, as identified in Springfield's Goal 8 Comprehensive Plan element — the Willamalane Comprehensive Plan.

The proposed UGB expansion addresses a portion of parkland and open space needs that can be met on publicly owned land adjacent to the existing UGB.

Springfield's review and amendment of the UGB to encompass existing publicly owned parks, open space and key public facilities land does not trigger simultaneous review and amendment of housing need or other category of land need. The lands in the UGB expansion are already designated and zoned Parks and Open Space, Agriculture in the Lane County Rural Comprehensive Plan — all non-urban, non-residential land located outside of the current UGB, therefore Springfield's buildable land inventory is not affected.

Therefore the proposed UGB amendment in consideration of one category of land need — certain public facilities, parkland and open space — is consistent with OAR 660-024-0040(3).

Goal 8 Conclusion: Amending the UGB and Metro Plan boundary to including existing Willamalane Parks and Open Space land is consistent with Goal 8 and 14.

Statewide Planning Goal 11: Public Facilities and Services

OAR 660-015-0000(11)

To plan and develop a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban and rural development.

Goal 11 requires urban development to be guided and supported by types and levels of urban public facilities and services appropriate for, but limited to, the needs and requirements of the urban and urbanizable areas to be served. A provision for key facilities must be included in each plan. Jurisdictions are required to develop and adopt public facility plans for areas within urban growth boundaries.

The goal defines “a timely, orderly and efficient arrangement” as “a system or plan that coordinates the type, locations and delivery of public facilities and services in a manner that best supports the existing and proposed land uses.”

The goal defines “urban facilities and services” as “key facilities and to appropriate types and levels of at least the following: police protection; sanitary facilities; storm drainage facilities; planning, zoning and subdivision control; health services; recreation facilities and services; energy and communication services; and community governmental services.”

As recommended in Goal 11 guideline A.1, the Goal 14 administrative rules provide rules for coordinating plans providing for public facilities and services with plans for designation of urban boundaries, urbanizable land, and for the transition of rural land to urban uses.

OAR 660-024-0040 addresses how land needs for the 20-year planning period must be determined, including land needs for employment, transportation and public facilities.

OAR 660-024-0040(7)

“The determination of 20-year land needs for transportation and public facilities for an urban area must comply with applicable requirements of Goals 11 and 12, rules in OAR chapter 660, divisions 11 and 12, and public facilities requirements in ORS 197.712 and 197.768. The determination of school facility needs must also comply with 195.110 and 197.296 for local governments specified in those statutes.”

Conclusion Goal 11 Applicability. Goal 11 is applicable to the 2030 plan amendments as it relates to the City’s determination of 20-year land needs for public facilities for the urban area. School facility needs are not addressed in the 2030 Plan amendments.

Metro Plan Public Facilities and Services Element. The City's 2030 Plan amendments rely upon the acknowledged Metro Plan policies, plans and findings to demonstrate Springfield's continued compliance with Goal 11 for Springfield's urban area. The Metro Plan III-G. Public Facilities and Services Element is the determination of 20-year land needs for transportation and public facilities for the lands within the Metro Plan boundary, including Springfield's urban and urbanizable areas.

The Springfield CIBL/EOA is the City's determination of 20-year land needs for employment. 20-year land needs for transportation and public facilities to serve employment and other uses will be accommodated via existing or planned facilities as identified in the Metro Plan Public Facilities and Services Element. The Metro Plan "Public Facilities and Services Element provides direction for the future provision of urban facilities and services to planned land uses within the *Metro Plan Plan Boundary*." (p. III-G-1)

The 2030 Plan amendments expand the UGB and Metro Plan boundary to meet long term employment needs and to bring existing public facilities, parks and open space into the City's UGB and Metro Plan boundary. The 2030 Plan amendment Ordinance Exhibit A amends both the Springfield UGB and the Metro Plan boundary within Springfield's jurisdictional area east of Interstate 5.

Lands within the existing UGB are subject to the Public Facilities and Services Element of the Metro Plan (Chapter III G), associated public facilities plans, policies, and existing acknowledged measures (Springfield Development Code land use regulations) that implement Public Facilities and Services Element of the Metro Plan (Chapter III G) plans and policies.

Lands added to the Springfield UGB and the Metro Plan boundary will be subject to the Public Facilities and Services Element of the Metro Plan (Chapter III G), associated public facilities plans, policies, and existing acknowledged measures (Springfield Development Code land use regulations) that implement Public Facilities and Services Element of the Metro Plan (Chapter III G) plans and policies.

2030 Plan establishes "holding area" designation and zoning allowing interim uses in UGB expansion areas consistent with Metro Public Facilities and Services Element. The 2030 Plan amendments plan and zone the UGB expansion areas new land uses within the *Metro Plan* plan boundary to allow agriculture uses, public facilities, parks and open space. These uses are the same uses the Metro Plan Public Facilities and Services Element assumed would occur in those areas.

At the time the Metro Plan Public Facilities and Services Element was acknowledged, the lands included in Springfield's UGB expansion were all within the Metro Plan Boundary²⁴. The

²⁴ A Metro Plan Boundary amendment initiated by Lane County was acknowledged in 2013. The result of that amendment was a Metro Plan Boundary east of Interstate 5 that is coterminous with Springfield's

acknowledged Metro Plan Public Facilities and Services Element provides direction for the future provision of urban facilities and services to planned land uses within the *Metro Plan* Plan Boundary as planned at the time the Metro Plan Public Facilities and Services Element was acknowledged. Planned land uses for lands within Springfield's existing UGB — as articulated in the 2030 Plan amendments — are consistent with planned uses as designated in the acknowledged Metro Plan and as provided with services pursuant to the Metro Plan Public Facilities and Services Element. Planned land uses for lands in Springfield's UGB expansion areas were assumed to be agriculture uses, public facilities, parks and open space.

2030 Plan long term planned uses within the UGB expansion area are employment uses, public facilities, parks and open space. Lands planned to meet long term employment needs are designated Urban Holding Area-Employment (UHA-E) and zoned Agriculture—Urban Holding Area (AG), an urban transition holding zone. The existing uses on lands designated Urban Holding Area – Employment and zoned Agriculture are agricultural uses and associated farm dwellings. Urban uses are not permitted until after annexation. Lands planned for public facilities, parks and open space are designated Public/Semi Public and zoned Public Land and Open Space.

Public facility plans coordinate the type, locations and delivery of public facilities and services in a timely, orderly and efficient manner. Goal 11 requires cities to develop and adopt public facility plans that describe how urban development will be guided and supported by types and levels of urban public facilities and services appropriate for, but limited to, the needs and requirements of the urban and urbanizable lands within the urban growth boundary to be served. The public facility plan is a support document to the comprehensive plan that coordinates the type, locations and delivery of public facilities and services in a timely, orderly and efficient manner that best supports the existing and proposed land uses. Division 11 provides rules for developing public facility plans. The facility plan describes the water, sewer and transportation facilities which are to support the land uses designated in the acknowledged comprehensive plan [OAR 660-015-0000(1)].

The designated interim “Urban Holding Area – Employment,” the designated “Public/semi-public” and “Natural Resource” land uses in the 2030 Plan amendments are supported by the Metro Plan Public Facilities and Services policies and PFSP.

For the purposes of Goal 11, a water system is subject to regulation under ORS 448.119 to 448.285[OAR 660-015-0000(1)].

For the purposes of Goal 11, extension of a sewer or water system means the extension of a pipe, conduit, pipeline, main, or other physical component from or to an existing sewer or water system, as defined by Commission rules.

existing UGB. The City's 2030 Plan will expand the Metro Plan Boundary east of Interstate 5 to be coterminous with Springfield's *amended* UGB.

Goal 11 guideline 1 states that plans providing for public facilities and services should be coordinated with plans for designations of urban boundaries, urbanizable land, and the transition from rural land to urban uses.

The 2030 Plan Urbanization Element includes policies requiring timely coordination of public facilities planning with land use and transportation planning to guide the transition of lands added to the UGB from rural to urban.

Goal 11 guideline 3 states that public facilities and services in urban areas should be provided at levels necessary and suitable for urban uses.

Goal 11 guideline 4 states: “Public facilities and services in urbanizable areas should be provided at levels necessary and suitable for existing uses. The provision for future public facilities and services in these areas should be based upon: (1) the time required to provide the service; (2) reliability of service; (3) financial cost; and (4) levels of service needed and desired.” (emphasis added)

Public facilities and services in urbanizable areas should be provided at levels necessary and suitable for existing uses. Existing uses in the UGB expansion areas are rural uses. Urban employment uses are not permitted outright by adoption of the 2030 Plan amendments. Instead, as described in the City’s findings below and under Goal 14, these lands are designated and zoned with an interim “holding zone.”

The 2030 Plan Urbanization Element includes policies requiring timely provision of urban services through the annexation process, consistent with applicable Metro Plan policies.

2030 Plan Urbanization Element Policy 30:

“Unincorporated land within the Springfield UGB may be developed with permitted uses at maximum density only upon annexation to the City when it is found that key urban facilities and services can be provided to the area to be annexed in an orderly and efficient manner. Provision of these services to the area proposed for annexation is consistent with the timing and location for such extension, where applicable, in the City’s infrastructure plans — such as the Public Facilities and Services Plan; the Springfield Transportation System Plan; the City’s Capital Improvement Program; and the urbanization goals, policies and implementation strategies of this Element — or a logical time within which to deliver these services has been determined, based upon demonstrated need and budgetary priorities.”

The PFSP describes the facilities and services needed in urban areas to provide service levels necessary and suitable for urban uses.

Eugene-Springfield Metropolitan Area Public Facilities and Services Plan. The Metro Plan Public Facilities and Services Element incorporates the findings and policies in the Eugene-Springfield Metropolitan Area Public Facilities and Services Plan (PFSP), adopted as a refinement to the Metro Plan. The PFSP is Springfield's acknowledged public facility plan. The PFSP provides guidance for public facilities and services, including planned water, wastewater, stormwater, and electrical facilities. As required by Goal 11, the PFSP identifies and shows the general location of the water, wastewater, and stormwater projects needed to serve land within the UGB. The PFSP also contains this information for electrical facilities, although not required to by law. (p. III-G-1, 2) The PFSP addresses facilities and services needed to serve the land uses designated in the comprehensive plan, including all urban land designated urban development within the Springfield UGB. The PFSP helps assure that urban development within Springfield's urban growth boundary is guided and supported by types and levels of urban facilities and services appropriate for the needs and requirements of the urban areas to be serviced, and that those facilities and services are provided in a timely, orderly and efficient arrangement, as required by Goal 11.

Springfield has a PFSP as required under ORS 197.712(2)(e).

Before the newly urbanizable land added to the Springfield UGB can transition from urbanizable to urban (e.g. annexation to the City of Springfield to allow urban development), transportation and public facilities must be planned and provided to serve the areas added to the UGB.

2030 Plan Urbanization Element Policy 29 states:

“Annexation shall continue to be a prerequisite for urban development and the delivery of City services in accordance with the Springfield Comprehensive Plan and Springfield Development Code.”

2030 Plan Urbanization Element Policy 30 states:

“Unincorporated land within the Springfield UGB may be developed with permitted uses at maximum density only upon annexation to the City when it is found that key urban facilities and services can be provided to the area to be annexed in an orderly and efficient manner. Provision of these services to the area proposed for annexation is consistent with the timing and location for such extension, where applicable, in the City's infrastructure plans — such as the Public Facilities and Services Plan; the Springfield Transportation System Plan; the City's Capital Improvement Program; and the urbanization goals, policies and implementation strategies of this Element — or a logical time within which to deliver these services has been determined, based upon demonstrated need and budgetary priorities.”

2030 Plan requires timely amendment of PFSP. 2030 Plan Urbanization Element Policy 37 requires the PFSP to be updated prior to approval of a PAPA or zoning amendment that permits urban development above the level currently permitted in the existing Lane County zoning:

“Prior to re-designating and rezoning land designated Urban Holding Area-Employment, the City shall update and adopt amendments to the Eugene-Springfield Metropolitan Public Facilities and Services Plan (PFSP) that may be needed to identify new facilities or major modification of facilities needed to serve development of urban employment uses within the North Gateway or Mill Race districts as necessary to demonstrate consistency with statewide planning Goal 11 and Goal 11 administrative rules requirements and the policies of Metro Plan Chapter III-G Public Facilities Element of the Metro Plan.”

Goal 11 guideline 5 states “A public facility or service should not be provided in an *urbanizable* area unless there is provision for coordinated development of all the other urban facilities and services appropriate to that area.”

Public facilities and services in Springfield’s *urban* areas will be provided at levels necessary and suitable for urban uses only after annexation to the City and shall be coordinated with development of all the other urban facilities and services appropriate to that area. [2030 Urbanization Element Policies 29, 30 and 31]

2030 Plan Urbanization Element Policy 27 states:

“The coordinated, timely provision of urban services is a central element of the City’s comprehensive growth management strategy for infill, redevelopment and new development. Development undertaken in pursuit of housing goals, diversifying the economy and neighborhood livability shall occur only after the logical and efficient delivery of all urban services have been provided to these sites.

- ***Prepare and adopt comprehensive plan and zoning updates at the neighborhood, district, and corridor scale to determine the density, character and design of urban development in alignment with infrastructure capacity to ensure efficient and economical delivery of urban services in balance with the City’s financial resources.”***

2030 Plan Urbanization Element Policy 28 states:

“Regionally significant public investments within Springfield’s UGB shall be planned on a metropolitan-wide basis, as described in the regional transportation and public facilities plans.”

The 203 Plan Urbanization Element (Ordinance Exhibit C-1, page 15-17 sets forth required planning procedures to ensure timely coordination of facilities planning for the UHA-E designated lands added to the UGB:

“PLAN AMENDMENT PROCEDURES AND REQUIREMENTS TO DESIGNATE UHA-E URBANIZABLE LAND FOR URBAN DEVELOPMENT BEFORE ANNEXATION AND DEVELOPMENT APPROVAL

Lands designated UHA-E require comprehensive plan amendments and may require facility plan amendments prior to their designation and zoning for urban employment use. The policies and implementation strategies in this Urbanization Element describe Statewide Planning Goal requirements that must be addressed prior to approval of plan and zoning changes that allow the transition from urbanizable to urban on lands designated UHA-E. Specific policies and implementation strategies are listed under each Urbanization Planning Goal to identify the steps needed before land may be designated, zoned and annexed to permit development to occur. These steps ensure that ample opportunities for citizen involvement are provided through community refinement planning processes conducted at the district scale to establish employment land use designations, zoning, design and development standards, transportation systems and public facilities to meet and balance community and industry needs in the North Gateway and Mill Race UHA-E Districts.”

and:

“Planning Requirements in Urban Holding Areas

District, refinement plan or master plan approval is required prior to or concurrent with annexation of land designated Urban Holding Area- Employment as shown in Table 3. Urban Holding Areas are zoned Agriculture - Urban Holding Area (AG) prior to plan amendment approval and prior to annexation.”

Table 5: Pre-Development Approval Process Steps – Urban Holding Areas	
City-initiated Planning Process	Owner-initiated Planning Process
1. City prepares Plan Amendment to address all applicable Statewide Planning Goals (e.g. amended or new refinement plan or district plan), Metro Plan and 2030 Comprehensive Plan policies and Springfield Development Code standards.	1. Applicant submits request to City to initiate amendments to Transportation System Plan and Public Facilities and Services Plan, and other city actions that may be required prior to plan amendment approval.
2. City and Lane County approve Plan Amendment to amend Metro Plan and Springfield 2030 Comprehensive Plan. UHA-E designation is replaced with employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, Industrial).	2. Applicant prepares and submits Plan Amendment application to address all applicable Statewide Planning Goals, Metro Plan and 2030 Comprehensive Plan policies, and Springfield Development Code standards. Applicant proposes employment plan

AG zoning remains in effect until Master Plan and new zoning are approved.	designations (e.g. Employment, Employment Mixed Use, Campus Industrial, Industrial).
3. City prepares and approves Zoning Map Amendment to apply new zoning districts (e.g. Industrial, Campus Industrial, Employment Mixed Use, Employment). Land is planned and zoned and eligible for annexation.	3. City and Lane County approve Plan Amendment to amend Metro Plan and Springfield 2030 Comprehensive Plan. UHA-E designation is replaced with employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, Industrial). AG zoning remains in effect until Master Plan and new zoning are approved.
4. Applicant prepares and submits Master Plan and annexation applications with demonstration of key urban service provision.	4. Applicant prepares and submits Master Plan with proposed zoning and demonstration of key urban services provision. Applicant submits annexation application.
5. City approves City approves Master Plan and annexation.	5. City approves Master Plan and Zoning Map Amendment and annexation.
6. Applicant submits Master Plan Type III, and Site Plan, Subdivision etc. Type II development applications.	6. Applicant submits Site Plan, Subdivision etc. Type II development applications.

The requirements above are also provided in the City’s AG Zoning District land use regulations (Ordinance Exhibit E), as explained in the City’s findings under Goals 9 and 14.

OAR 660-024-0060(8)

“The Goal 14 boundary location determination requires evaluation and comparison of the relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services needed to urbanize alternative boundary locations...

The evaluation and comparison must include:

- (a) The impacts to existing water, sanitary sewer, storm water and transportation facilities that serve nearby areas already inside the UGB;*
- (b) The capacity of existing public facilities and services to serve areas already inside the UGB as well as areas proposed for addition to the UGB; and*
- (c) The need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other*

major improvements on existing roadways and, for urban areas of 25,000 or more, the provision of public transit service.”

Goal 11 is applicable to the 2030 plan amendments as it relates to the City’s Goal 14 Boundary Alternatives Analysis process to evaluate and compare potential UGB expansion areas.

As part of Springfield’s 2030 Plan CIBL/EOA planning process, ECO Northwest and the City conducted analysis to identify public facilities and services needed to serve target employers, forecast employment growth industries, site types and site needs. The CIBL/EOA planning process identified infrastructure and service capacity constraints and development constraints as they affect the suitability and serviceability of lands in the CIBL inventory to meet identified employment site needs. ECONorthwest and the City examined industry service needs to evaluate the capacity of existing and planned public facilities and services (water, sanitary sewer, stormwater and transportation facilities) to serve areas already inside the UGB as well as areas proposed for addition to the UGB.

As part of Springfield’s UGB Alternatives Analysis process, the City conducted a series of comparative analyses to determine the degree of difficulty of serving alternative locations for UGB expansion, to identify the facilities and services that potentially will be needed and to estimate cost of developing and providing infrastructure and services. The City’s comparative estimated costs are high level approximate “rough cost estimates” expressed in current-year dollars, developed to aid in achieving the requirements of Goal 11, Public Facilities and Services, OAR 660-015-0000(11). Project cost estimates are not intended to be as exact as is required for budgeting purposes.

Goal 14 comparative analyses of serving alternative UGB expansion locations. As part of the City’s evaluation of candidate lands to include in the UGB expansion, staff conducted outreach with agency staff and service providers to conduct comparative analyses of alternative UGB expansion locations to:

- Identify public facilities and services that may be required to serve candidate areas;
- Estimate costs to provide services public facilities and services that may be required to serve candidate areas;
- Identify candidate areas or portions thereof that could be served by facilities that are already planned to serve lands within the existing UGB.
- Compare 20-year land needs for transportation and public facilities that may be required to serve the UGB expansion areas as they ultimately develop with urban uses. For this high level analysis, the City assumed Campus Industrial–type employment uses and densities would be planned for the expansion areas.

The City evaluated and compared of the relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services

needed to urbanize alternative boundary locations:²⁵ The City’s analysis identified the facilities and services that potentially will be needed — based on service levels for industrial and commercial uses consistent with plan policies.

ORS 197.712(2)(c)

“By the adoption of new goals or rules, or the application, interpretation or amendment of existing goals or rules, the Land Conservation and Development Commission shall implement all of the following:

(c) Comprehensive plans and land use regulations shall provide for at least an adequate supply of sites of suitable sizes, types, locations and service levels for industrial and commercial uses consistent with plan policies.”

The 2030 Plan expands the UGB to “provide at least an adequate supply of sites of suitable sizes, types, locations and service levels for industrial and commercial uses consistent with plan policies.” For the purposes of the City’s public facilities and services analysis to compare and evaluate potentially suitable UGB expansion areas under Goal 14, the City evaluated needed urban services levels for industrial and commercial uses consistent with plan policies in the Metro Plan Public Facilities and Services Element, PFSP, and 2030 Plan Urbanization Element.

OAR 660-011-0025 Timing of Required Facilities

“(1) The public facilities plan shall include a general estimate of the timing for the planned public facility projects. This timing component of the public facilities plan can be met in several ways depending on whether the project is anticipated in the short term or long term. The timing of projects may be related directly to population growth, e.g., the expansion or new construction of water treatment facilities. Other facility projects can be related to a measure of the facility’s service level being met or exceeded, e.g., a major arterial or intersection reaching a maximum vehicle-per-day standard. Development of other projects may be more long term and tied neither to specific population levels nor measures of service levels, e.g., sewer projects to correct infiltration and inflow problems. These projects can take place over a long period of time and may be tied to the availability of long-term funding. The timing of projects may also be tied to specific years.

(2) Given the different methods used to estimate the timing of public facilities, the public facility plan shall identify projects as occurring in either the short term or long term, based on those factors which are related to project

²⁵ The City’s findings under Goal 14: “Public Facilities Analysis” provide summaries of public facilities for UGB study area lands organized by priority categories pursuant to ORS 197.298, and specific references to the facilities plans used as the factual base to inform the analysis.

development. For those projects designated for development in the short term, the public facility plan shall identify an approximate year for development. For those projects designated for development over the long term, the public facility plan shall provide a general estimate as to when the need for project development would exist, e.g., population level, service level standards, etc. Timing provisions for public facility projects shall be consistent with the acknowledged comprehensive plan's projected growth estimates. The public facility plan shall consider the relationships between facilities in providing for development.

(3) Anticipated timing provisions for public facilities are not considered land use decisions as specified in ORS 197.712(2)(e), and, therefore, cannot be the basis of appeal under ORS 197.610(1) and (2) or 197.835(4)."

2030 Plan Urbanization Element Policy 37 requires the PFSP to be updated prior to approval of a PAPA or zoning amendment that permits urban development above the level currently permitted in the existing Lane County zoning:

"Prior to re-designating and rezoning land designated Urban Holding Area-Employment, the City shall update and adopt amendments to the Eugene-Springfield Metropolitan Public Facilities and Services Plan (PFSP) that may be needed to identify new facilities or major modification of facilities needed to serve development of urban employment uses within the North Gateway or Mill Race districts as necessary to demonstrate consistency with statewide planning Goal 11 and Goal 11 administrative rules requirements and the policies of Metro Plan Chapter III-G Public Facilities Element of the Metro Plan."

To evaluate and compare the ESEE consequences of expanding the UGB in different locations under ORS 197.298 and Goal 14, City Engineering and Finance staff:

- Identified projects that would likely be needed to serve the area
- Prepared rough cost estimates of projects
- Identified potential funding mechanisms

Timing of needed projects shall be identified when the PFSP is updated.

OAR 660-011-0030 Location of Required Facilities

"(1) The public facility plan shall identify the general location of the public facility project in specificity appropriate for the facility. Locations of projects anticipated to be carried out in the short term can be specified more precisely than the locations of projects anticipated for development in the long term.

(2) Anticipated locations for public facilities may require modifications based on subsequent environmental impact studies, design studies, facility master plans, capital improvement programs, or land availability. The public facility plan should anticipate those changes as specified in OAR 660-011-0045.”

The existing PFSP and local facilities plans identify general location of needed public facility projects to serve lands designated for urban employment and other uses within the existing UGB.

The City’s UGB Boundary Alternatives Analysis findings²⁶ (Public Facilities and Services Analysis) identifies anticipated locations for public facilities needed to serve uses within the existing UGB and the UGB expansion areas.

OAR 660-011-0035 Determination of Rough Cost Estimates for Public Facility Projects and Local Review of Funding Mechanisms for Public Facility Systems

“(1) The public facility plan shall include rough cost estimates for those sewer, water, and transportation public facility projects identified in the facility plan. The intent of these rough cost estimates is to:

(a) Provide an estimate of the fiscal requirements to support the land use designations in the acknowledged comprehensive plan; and

(b) For use by the facility provider in reviewing the provider's existing funding mechanisms (e.g., general funds, general obligation and revenue bonds, local improvement district, system development charges, etc.) and possible alternative funding mechanisms. In addition to including rough cost estimates for each project, the facility plan shall include a discussion of the provider's existing funding mechanisms and the ability of these and possible new mechanisms to fund the development of each public facility project or system. These funding mechanisms may also be described in terms of general guidelines or local policies.

(2) Anticipated financing provisions are not considered land use decisions as specified in ORS 197.712(2)(e) and, therefore, cannot be the basis of appeal under ORS 197.610(1) and (2) or 197.835(4).”

The existing PFSP and local facilities plans comply with OAR 660-011-0035. The City’s UGB Boundary Alternatives Analysis planning process provided planning level rough cost estimates. Estimated project costs and comparisons are provided in the City’s findings under Goal 14.

²⁶ The referenced City’s findings are located in this report under Goal 14 subheader OAR 660-024-0060.

OAR Division 11 Conclusion: Springfield’s existing comprehensive plan, PFSP and 2030 Plan Urbanization Element policies comply with the applicable rules of Division 11.

Consistency with Metro Plan Public Facilities and Services Element. The 2030 Plan amendments do not include amendments to the Metro Plan Public Facilities and Services Element or concurrent amendments to the PFSP. The following findings and policies from the existing acknowledged Metro Plan Public Facilities and Services Element are applicable to Springfield land use decisions. Thus, the findings and policies are related to the 2030 Plan amendments, are provided in this report to demonstrate compliance with Goal 11 and Division 11 Public Facilities Planning, and to provide context for the 2030 Plan amendments. Excerpts from existing plan text are shown in italicized font.

“The availability of public facilities and services is a key factor influencing the location and density of future development. The public’s investment in, and scheduling of, public facilities and services are a major means of implementing the Metro Plan. As the population of the Eugene-Springfield area increases and land development patterns change over time, the demand for urban services also increases and changes. These changes require that service providers, both public and private, plan for the provision of services in a coordinated manner, using consistent assumptions and projections for population and land use.”

Goals

1. *Provide and maintain public facilities and services in an efficient and environmentally responsible manner.*
2. *Provide public facilities and services in a manner that encourages orderly and sequential growth.*

Findings and Policies

- *Urban expansion within the UGB is accomplished through in-fill, redevelopment, and annexation of territory which can be served with a minimum level of key urban services and facilities. This permits new development to use existing facilities and services, or those which can be easily extended, minimizing the public cost of extending urban facilities and services.*
- *In accordance with Statewide Planning Goal 11 and OAR 660, the Public Facilities and Services Plan identifies jurisdictional responsibility for the provision of water, wastewater and stormwater, describes respective service areas and existing and planned water, wastewater, and stormwater facilities, and contains planned facilities maps for these services. Electric system information and improvements are included in the Public Facilities and Services Plan, although not required by state law. Local facility master plans and refinement plans provide more specific project information.*

- *The Public Facilities and Services Plan finds that almost all areas within the city limits of Eugene and Springfield are served or can be served in the short-term (0-5 years) with water, wastewater, stormwater, and electric service. Exceptions to this are stormwater service to portions of the Willow Creek area and southeast Springfield, and full water service at some higher elevations in Eugene's south hills. Service to these areas will be available in the long term. Service to all areas within city limits are either in a capital improvement plan or can be extended with development.*
- *With the improvements specified in the Public Facilities and Services Plan project lists, all urbanizable areas within the UGB can be served with water, wastewater, stormwater, and electric service at the time those areas are developed. In general, areas outside city limits serviceable in the long term are located near the urban growth boundary and in urban reserves, primarily in River Road/Santa Clara, west Eugene's Willow Creek area, south Springfield, and the Thurston and Jasper-Natron areas in east Springfield.*
- *As discussed in the Public Facilities and Services Plan, a majority of Nodal Development Areas proposed in TransPlan are serviceable now or in the short term. The City of Eugene's adopted Growth Management Policy #15 states, "Target publicly-financed infrastructure extensions to support development for higher densities, in-fill, mixed uses, and nodal development."*
- *Springfield relies on groundwater for its sole source of water. Eugene Water & Electric Board's (EWEB) water source is the McKenzie River and EWEB is developing groundwater sources. The identification of projects on the Public Facilities and Services Plan planned facilities map does not confer rights to a groundwater source.*
- *Administration and enforcement of the Clean Water Act stormwater provisions occur at the state level, through National Pollutant Discharge Elimination System (NPDES) permitting requirements. Applicable jurisdictions are required to obtain an NPDES stormwater permit from the Oregon Department of Environmental Quality (DEQ), and prepare a water quality plan outlining the Best Management Practices (BMPs) to be taken over a five-year permit period for reducing stormwater pollutants to "the maximum extent practicable."*
- *The Clean Water Act requires states to assess the quality of their surface waters every three years, and to list those waters that do not meet adopted water quality standards. The Willamette River and other water bodies have been listed as not meeting the standards for temperature and bacteria. This will require the development of Total*

Maximum Daily Loads (TMDLs) for these pollutants, and an allocation to point and non-point sources.

- *The listing of Spring Chinook Salmon as a threatened species in the Upper Willamette River requires the application of Endangered Species Act (ESA) provisions to the salmon's habitat in the McKenzie and Willamette Rivers. The decline in the Chinook Salmon has been attributed to such factors as destruction of habitat through channelization and revetment of river banks, non-point source pollution, alterations of natural hydrograph by increased impervious surfaces in the basin, and degradation of natural functions of riparian lands due to removal or alteration of indigenous vegetation.*
- *There are many advantages to keeping channels open, including, at a minimum, natural biofiltration of stormwater pollutants; greater ability to attenuate effects of peak stormwater flows; retention of wetland, habitat, and open space functions; and reduced capital costs for stormwater facilities.*
- *An increase in impervious surfaces, without mitigation, results in higher peak flows during storm events, less opportunity for recharging of the aquifer, and a decrease in water quality.*
- *Stormwater systems tend to be gravity-based systems that follow the slope of the land rather than political boundaries. In many cases, the natural drainageways such as streams serve as an integral part of the stormwater conveyance system.*
- *In general, there are no programs for stormwater maintenance outside the Eugene and Springfield city limits, except for the Lane County Roads Program. State law limits county road funds for stormwater projects to those located within the public right-of-way.*
- *Filling in designated floodplain areas can increase flood elevations above the elevations predicted by Federal Emergency Management Agency (FEMA) models, because the FEMA models are typically based only on the extent of development at the time the modeling was conducted and do not take into account the ultimate buildout of the drainage area. This poses risks to other properties in or adjacent to floodplains and can change the hydrograph of the river.*
- *State Planning Goal 5 and OAR 660-023-0090 require state and local jurisdictions to identify and protect riparian corridors.*

Policies

- **Policy G.1: Extend the minimum level and full range of key urban facilities and services in an orderly and efficient manner consistent with the growth management policies in Chapter II-B, relevant policies this chapter, and other Metro Plan policies.**
- **Policy G.2: Use the planned facilities maps of the Public Facilities and Services Plan to guide the general location of water, wastewater, stormwater, and electrical projects in the metropolitan area. Use local facility master plans, refinement plans, capital improvement plans and ordinances as the guide for detailed planning and project implementation.**
- **Policy G.3: Modifications and additions to or deletions from the project lists in the Public Facilities and Services Plan for water, wastewater, and stormwater public facility projects or significant changes to project location, from that described in the Public Facilities and Services Plan maps 1, 2 and 3, require amending the Public Facilities and Services Plan and the Metro Plan, except for the following:**
 - 1) Modifications to a public facility project which are minor in nature and do not significantly impact the project's general description, location, sizing, capacity or other general characteristic of the project; or**
 - 2) Technical and environmental modifications to a public facility which are made pursuant to final engineering on a project; or**
 - 3) Modifications to a public facility project which are made pursuant to findings of an Environmental Assessment or Environmental Impact Statement conducted under regulations implementing the procedural provisions of the National Environmental Policy Act of 1969 or any federal or State of Oregon agency project development regulations consistent with that act and its regulations.**
- **Policy G.4: The cities and Lane County shall coordinate with EWEB, SUB, and special service districts operating in the metropolitan area, to provide the opportunity to review and comment on proposed public facilities, plans, programs, and public improvement projects or changes thereto that may affect one another's area of responsibility.**
- **Policy G.7: Service providers shall coordinate the provision of facilities and services to areas targeted by the cities for higher densities, infill, mixed uses, and nodal development.**

- ***Policy G.10: Continue to take positive steps to protect groundwater supplies. The cities, county, and other service providers shall manage land use and public facilities for groundwater-related benefits through the implementation of the Springfield Drinking Water Protection Plan and other wellhead protection plans. Management practices instituted to protect groundwater shall be coordinated among the City of Springfield, City of Eugene, and Lane County.***
- ***Policy G.11: Ensure that water main extensions within the urban growth boundary include adequate consideration of fire flows.***
- **Policy G.13: Improve surface and ground water quality and quantity in the metropolitan area by developing regulations or instituting programs for stormwater to:**
 - a. **Increase public awareness of techniques and practices private individuals can employ to help correct water quality and quantity problems;**
 - b. **Improve management of industrial and commercial operations to reduce negative water quality and quantity impacts;**
 - c. **Regulate site planning for new development and construction to better manage pre- and post-construction storm runoff, including erosion, velocity, pollutant loading, and drainage;**
 - d. **Increase storage and retention and natural filtration of storm runoff to lower and delay peak storm flows to settle out pollutants prior to discharge into waterways;**
 - e. **Require on-site controls and development standards, as practical, to reduce off-site impacts from stormwater runoff;**
 - f. **Use natural and simple mechanical treatment systems to provide treatment for potentially contaminated runoff waters;**
 - g. **Reduce street-related water quality and quantity problems;**
 - h. **Regulate use and require containment and/or pretreatment of toxic substances;**
 - i. **Include containment measures in site review standards to minimize the effects of chemical and petroleum spills; and**
 - j. **Consider impacts to ground water quality in the design and location of dry wells.**

- ***Policy G.14: Implement changes to stormwater facilities and management practices to reduce the presence of pollutants regulated under the Clean Water Act and to address the requirements of the Endangered Species Act.***
- ***Policy G.15: Consider wellhead protection areas and surface water supplies when planning stormwater facilities.***
- ***Policy G.16: Manage or enhance waterways and open stormwater systems to reduce water quality impacts from runoff and to improve stormwater conveyance.***
- ***Policy G.17: Include measures in local land development regulations that minimize the amount of impervious surface in new development in a manner that reduces stormwater pollution, reduces the negative effects from increases in runoff, and is compatible with Metro Plan policies.***
- ***Policy G.18: The cities and Lane County shall adopt a strategy for the unincorporated area of the urban growth boundary to: reduce the negative effects of filling in floodplains and prevent the filling of natural drainage channels except as necessary to ensure public operations and maintenance of these channels in a manner that preserves and /or enhances floodwater conveyance capacity and biological function.***
- ***Policy G.19: Maintain flood storage capacity within the floodplain, to the maximum extent practical, through measures that may include reducing impervious surface in the floodplain and adjacent areas.***
- ***Policy G.26: Plan for the following levels of service for rural designations outside the urban growth boundary within the Metro Plan Boundary:***
 - a. Agriculture, Forest Land, Sand and Gravel, and Parks and Open Space. No minimum level of service is established.***
 - b. Rural Residential, Rural Commercial, Rural Industrial, and Government and Education. On-site sewage disposal, individual water systems, rural level of fire and police protection, electric and communication service, schools, and reasonable access to solid waste disposal facility.***
- ***Policy G.27: Consistent with local regulations, locate new urban water, wastewater, and stormwater facilities on farm land and urban water and wastewater facilities on forest land outside the urban growth boundary only when the facilities exclusively serve land inside the urban growth boundary and there is no reasonable alternative.***

- ***Policy G.29: Facility providers shall coordinate with Lane County and other local jurisdictions and obtain the necessary county land use approvals to amend the Lane County Rural Comprehensive Plan, or the Metro Plan, as needed and consistent with state law, to appropriately designate land for urban facilities located outside the urban growth boundary or the Plan boundary.***
- ***Policy G.30: The cities shall coordinate with Lane County on responsibility and authority to address stormwater-related issues outside the Plan boundary, including outfalls outside the Springfield portion of the urban growth boundary.***

The City's findings under Goal 14, (pages 212-235 of this report, and Tables 5, 11, and 17) identify the facilities plans the City to determine infrastructure and public facilities needs in the Boundary Alternatives Analysis.

Goal 11 PFSP Conclusions: The City conducted analysis to identify public facilities that are likely to be needed within the 2010-2030 planning period to serve the North Gateway and Mill Race UGB expansion areas.(Table 17)

The 2030 plan amendments designate urbanizable land in the UGB expansion areas as "Urban Holding Area - Employment (UHA-E), an urban transition plan designation. Lands designated UHA-E are zoned Agriculture, an urban transition zoning district. Urban land uses are not permitted until subsequent plan amendments and zone changes that demonstrate compliance with applicable planning goals including Goal 11 are adopted and acknowledged to allow transition from rural to urban. Public facilities and services needed to serve land designated for urban development in the UHA-E districts will be determined in coordination with subsequent refinement and master planning of the two new employment districts. The PFSP shall be amended as necessary after specific facility needs are determined. The 2030 Plan Urbanization Element and AG Zoning District land use regulations describe the required sequencing of post-acknowledgement plan amendments, including PFSP amendments.

The 2030 plan amendments meet the applicable requirements of Goal 11. As Springfield adopts subsequent plan amendments and zone changes that make adjustments to permitted uses or densities, the City will evaluate effects on capacity of public infrastructure, and where necessary, propose additional plan amendments in compliance with this goal.

OAR 660-011-0000 Definitions

(1) "Public Facilities Plan": A public facility plan is a support document or documents to a comprehensive plan. The facility plan describes the water, sewer and transportation facilities which are to support the land uses designated in the appropriate acknowledged comprehensive plans within an urban growth boundary containing a population greater than 2,500. Certain elements of the public facility plan also shall be adopted as part of the comprehensive plan, as specified in OAR 660-11-045.

(2) "Rough Cost Estimates": Rough cost estimates are approximate costs expressed in current-year (year closest to the period of public facility plan development) dollars. It is not intended that project cost estimates be as exact as is required for budgeting purposes.

(3) "Short Term": The short term is the period from year one through year five of the facility plan.

(4) "Long Term": The long term is the period from year six through the remainder of the planning period.

(5) "Public Facility": A public facility includes water, sewer, and transportation facilities, but does not include buildings, structures or equipment incidental to the direct operation of those facilities.

(6) "Public Facility Project": A public facility project is the construction or reconstruction of a water, sewer, or transportation facility within a public facility system that is funded or utilized by members of the general public.

(7) "Public Facility Systems": Public facility systems are those facilities of a particular type that combine to provide water, sewer or transportation services.

For purposes of this division, public facility systems are limited to the following:

(a) Water:

(A) Sources of water;

(B) Treatment system;

(C) Storage system;

(D) Pumping system;

(E) Primary distribution system.

(b) Sanitary sewer:

(A) Treatment facilities system;

(B) Primary collection system.

(c) Storm sewer:

(A) Major drainageways (major trunk lines, streams, ditches, pump stations and retention basins);

(B) Outfall locations.

(d) Transportation:

(A) Freeway system, if planned for in the acknowledged comprehensive plan;

(B) Arterial system;

(C) Significant collector system;

(D) Bridge system (those on the Federal Bridge Inventory);

(E) Mass transit facilities if planned for in the acknowledged comprehensive plan, including purchase of new buses if total fleet is less than 200 buses, rail lines or transit stations associated with providing transit service to major transportation corridors and park and ride station;

(F) Airport facilities as identified in the current airport master plans;

(G) Bicycle paths if planned for in the acknowledged comprehensive plan.

(8) "Land Use Decisions": In accordance with [ORS 197.712\(2\)\(e\)](#), project timing and financing provisions of public facility plans shall not be considered land use decisions as specified under [ORS 197.015\(10\)](#).

(9) "Urban Growth Management Agreement": In accordance with OAR 660-003-0010(2)(c), and urban growth management agreement is a written statement, agreement or set of agreements setting forth the means by which a plan for management of the unincorporated area within the urban growth boundary will be completed and by which the urban growth boundary may be modified (unless the same information is incorporated in other acknowledged documents).

(10) Other Definitions: For the purposes of this division, the definitions in [ORS 197.015](#) shall apply except as provided for in section (8) of this rule regarding the definition in [ORS 197.015\(10\)](#).

Statewide Planning Goal 12: Transportation

OAR 660-015-0000(12)

To provide and encourage a safe, convenient and economic transportation system

Goal 12 lists nine requirements for transportation plans, including the requirement for Transportation plans to conform with local and regional comprehensive land use plans. This section of the City's findings explain how the subject 2030 Plan amendments to the comprehensive plan were coordinated with local and regional transportation planning to support and advance the planning objectives in Goal 12:

"Plans shall (1) consider all modes of transportation including mass transit, air, water, pipeline, rail, highway, bicycle and pedestrian; including mass transit,

air, water, pipeline, rail, highway, bicycle and pedestrian; (2) be based upon an inventory of local, regional and state transportation needs; (3) consider the differences in social consequences that would result from utilizing differing combinations of transportation modes; (4) avoid principal reliance upon any one mode of transportation; (5) minimize adverse social, economic and environmental impacts and costs; (6) conserve energy; (7) meet the needs of the transportation disadvantaged by improving transportation services; (8) facilitate the flow of goods and services so as to strengthen the local and regional economy; and (9) conform with local and regional comprehensive land use plans."

The City's findings under Goal 12 provide supporting rationale to explain how coordination with local and regional transportation planning strongly influenced the City's evaluation of policy alternatives under Goal 9 and 12, and its evaluation of Urban Growth Boundary Alternatives under Goal 14 and OAR 660-024-0060.

Goal 12 defines *Transportation* as *"the movement of people and goods."*

Goal 12 defines *Transportation Facility* as *"any physical facility that moves or assists in the movement of people and goods excluding electricity, sewage and water."*

Goal 12 defines *Transportation System* as *"one or more transportation facilities that are planned, developed, operated and maintained in a coordinated manner to supply continuity of movement between modes, and within and between geographic and jurisdictional areas."*

Goal 12 defines *Mass Transit* as *"any form of passenger transportation which carries members of the public on a regular and continuing basis."*

Goal 12 defines *Transportation Disadvantaged* as *"those individuals who have difficulty in obtaining transportation because of their age, income, physical or mental disability."*

Springfield's acknowledged transportation plans are the regional transportation system plan (RTSP) *TransPlan*, which guides development through 2021, and Springfield's local 2035 Transportation System Plan (TSP), effective 2015-2035.²⁷ The plans were acknowledged to affirm conformance with local and regional comprehensive land use plans in compliance with Goal 12. The acknowledged regional and local transportation system plans are in effect over the 2010-2030 planning period of the subject 2030 Plan amendments to the comprehensive plan. In 2016, the RTSP is in the process of being updated.²⁸

²⁷ The Springfield TSP and adopted findings are included in the record.

²⁸ Central Lane MPO Unified Planning Work Program FY2016-2017 Interim Review and Update, Addendum to the UPWP, May 2016, Item 4 Regional Transportation System Plan. The MPO is scheduled to resume work of the RTSP after the Eugene TSP is completed. See also Item 6. Transportation Planning Performance Measures and Revised Estimated Timeline.

Springfield and Eugene, having separate UGBs, are in the process of developing local comprehensive land use plans that will eventually supplant the Metro Plan comprehensive land use plan. Updates to the regional transportation plan will conform with Eugene and Springfield's local comprehensive land use plans, as required by Goal 12. Updates to the TSP will conform with Springfield's local comprehensive land use plan.

The City's subject 2030 Plan amendments as they address land uses within the existing UGB have been planned in coordination with Springfield's acknowledged TSP and *TransPlan*.

The City's subject 2030 Plan amendments as they address lands added to the UGB have been planned in coordination with the applicable transportation policies in Springfield's acknowledged TSP, Metro Plan Transportation Element Land Use policies.

Springfield 2030 Economic and Urbanization Element policies guide land use development over the 2010-2030 planning period consistent with the transportation policies in Springfield's acknowledged TSP, and Metro Plan Transportation Element Land Use policies.

Transportation planning required prior to future development in UGB expansion areas.

Transportation planning will be coordinated with future urbanization of lands added to the UGB by the City's subject 2030 Plan amendments through future amendments to the TSP and RTSP. The City and Lane County adopted 2030 Plan Urbanization Element policies and land use regulations requiring a post-acknowledgement plan amendment process — including necessary updates to the TSP — prior to issuance of land use development approval that increases trips above existing rural levels of use. By adopting Ordinance Exhibits A-2, A-3 and E, the City and Lane County designated the newly urbanizable employment lands added to the UGB as "Urban Holding Area – Employment" and zoned the lands "Agriculture –Urban Holding Area."

Springfield 2030 Economic and Urbanization Element policies guide development of employment land uses over the 2010-2030 planning period consistent with the transportation policies in Springfield's acknowledged TSP and in coordination with regional transportation plans as they are updated.

The required PAPA process to update the TSP will address OAR 660-009-0000(1)(i): *"Ensure that changes to comprehensive plans are supported by adequate planned transportation facilities."*

OAR 660-012-0000(1) Oregon Administrative Rules Division 12 implements Statewide Planning Goal 12 (Transportation) "to provide and encourage a safe, convenient and economic transportation system" and "implements provisions of other statewide planning goals related to transportation planning in order to plan and develop transportation facilities

and services in close coordination with urban and rural development.” The Stated purpose of Division 12 Transportation Planning is:

“to direct transportation planning in coordination with land use planning to:

(a) Promote the development of transportation systems adequate to serve statewide, regional and local transportation needs and the mobility needs of the transportation disadvantaged;

(b) Encourage and support the availability of a variety of transportation choices for moving people that balance vehicular use with other transportation modes, including walking, bicycling and transit in order to avoid principal reliance upon any one mode of transportation;

(c) Provide for safe and convenient vehicular, transit, pedestrian, and bicycle access and circulation;

(d) Facilitate the safe, efficient and economic flow of freight and other goods and services within regions and throughout the state through a variety of modes including road, air, rail and marine transportation;

(e) Protect existing and planned transportation facilities, corridors and sites for their identified functions;

(f) Provide for the construction and implementation of transportation facilities, improvements and services necessary to support acknowledged comprehensive plans;

(g) Identify how transportation facilities are provided on rural lands consistent with the goals;

(h) Ensure coordination among affected local governments and transportation service providers and consistency between state, regional and local transportation plans; and

(i) Ensure that changes to comprehensive plans are supported by adequate planned transportation facilities.”

Because Springfield’s population is greater than 2,500, Goal 12 administrative rules required the City to prepare and adopt a TSP. Prior to 2014, Springfield met this requirement through the local and regionally adopted TransPlan.

TransPlan (last amended in 2002) conforms with the land use designations and land use patterns established in Springfield’s acknowledged local and regional comprehensive land use plans — the Metro Plan and Springfield’s acknowledged refinement plans.

Prior to 2014, the 2002 TransPlan served as both the adopted local TSPs for Eugene and Springfield and as the Regional Transportation System Plan (RTSP) for the Central Lane MPO area.

In 2014 the Springfield 2035 TSP was adopted to supersede TransPlan as the City's specific refinement of the Eugene-Springfield Comprehensive General Plan (Metro Plan) insofar as it affects transportation systems within the Springfield UGB.

In 2016, the city of Eugene is preparing the Eugene TSP.

TransPlan will remain as the Regional Transportation System Plan (RTSP) for Eugene and Springfield until a new RTSP is adopted by the appropriate MPO jurisdictions. An updated RTSP is being developed through a regional process as outlined in a work plan agreed to with the Land Conservation and Development Commission.²⁹

As stated in the City's TSP findings³⁰:

"... the needs, projects, and policies identified in the Springfield TSP are consistent with TransPlan population and employment projections and therefore the TSP is consistent with TransPlan. Thus, TransPlan can serve as the benchmark for meeting this criterion until such a time that the ongoing regional process is complete. Until the new RTSP is adopted, Springfield is still held to the adopted performance standards in TransPlan (acting as the RTSP) and nothing in the 2035 Springfield TSP will inhibit or discourage continued achievement of the 2002 TransPlan performance objectives."

The City of Springfield 2035 Transportation System Plan (TSP) was adopted and acknowledged in 2014³¹ to replace the TransPlan as Springfield's local TSP after a thorough TSP planning process involving the general public, stakeholders, other agency staff and local and regional appointed and elected officials. The TSP conforms with the land use designations and land use patterns established in Springfield's local and regional comprehensive land use plans — the Metro Plan (including the acknowledged Springfield 2030 Residential Land Use and Housing Element³² and Springfield's acknowledged refinement plans).

The Springfield TSP is a comprehensive 20-year plan to guide transportation investments within the City of Springfield UGB — replacing TransPlan as the Transportation Element of the Metro Plan for the City of Springfield. The TSP was adopted by Springfield and Lane

²⁹ Central Lane MPO Unified Planning Work Program (WPWP) Addendum to the UPWP May 2016, p. 8 revised timeline, Action Item 4.

³⁰ Springfield File No. TYP413-00009, Staff Report Attachment 1, p. 19.

³¹ Springfield Ordinance No. 6314, Springfield File No. TYP413-00009, Staff Report Exhibit A 2/24/14.

³² Springfield Ordinance No. 6268 establishing a separate City of Springfield UGB pursuant to House Bill 3337 (2006) as codified in Oregon Revised Statute 197.304.

County as a post acknowledgement plan amendment of the Metro Plan — as a supporting facility refinement plan providing more detailed policy guidance for specific transportation facilities, as required under Goal 12.

Springfield’s acknowledged TSP provides a 20-year blueprint for how the City should maintain and improve the transportation network to meet growth demands within the existing Springfield UGB. The TSP addressed OAR 660-009-0000(1) (a) – (h).

The Springfield TSP identifies the preferred future multi-modal transportation system and the City’s policies related to the transportation system. It also identifies the function, capacity, and location of future facilities, and identifies planning-level costs for needed improvements to support expected development and growth and possible sources of system funding. The TSP goals and policies implement the Goal 12: Transportation Element of the Metro Plan.³³ It is important to note that transportation modelling for the acknowledged TSP was developed in coordination with Springfield’s 2030 comprehensive planning as follows:

“The transportation model used in the Springfield TSP differs from the TRANSPLAN model used in TransPlan. The TSP used the Springfield 2035 BUILD 1 (full build) model, which incorporates the Springfield 2030 land use plan. The coordinated population for Springfield created by PSU/PRC was used to derive population and housing growth for the model study area. The employment forecast was made by LCOG based on historical trends.”³⁴ (emphasis added)

“Comparisons are made below with TRANSPLAN, the regional TSP for the Eugene/Springfield area. There are significant differences between TRANSPLAN and the SPRINGFIELD travel model:

- a) TRANSPLAN geography is that of the METROPLAN; it does not include the City of Coburg. The SPRINGFIELD 2035 geography is that of the current MPO which includes Coburg and some additional Lane County land surrounding the UGBs.*
- b) TRANSPLAN model used 295 transportation analysis zones; the 2035 SPRINGFIELD model uses 666 transportation analysis zones. Thus, the latter has more refinement in the analysis units.*
- c) TRANSPLAN model did not have special treatment for BRT system operations; the 2035 SPRINGFIELD model does.*
- d) TRANSPLAN land use included the TRANSPLAN nodes. The 2035 SPRINGFIELD model has no specific nodes specified.*
- e) TRANSPLAN used the TPR vehicle trip rate reduction of 10% allowed by the TPR. The 2035 SPRINGFIELD model did not. (VTR=vehicle trip reduction). Under this*

³³ Springfield 2035 Transportation System Plan (TYP413-00009) Staff Report, p. 2.

³⁴ Springfield 2035 Transportation System Plan (TYP413-00009) Staff Report Attachment A: Statistics from the Springfield 2035 BUILD 1 travel demand model.

reduction trips from areas designated as mixed-use, pedestrian friendly areas are removed and transferred to other modes.”³⁵

As stated in the adopted TSP findings, Springfield Ordinance 6314 Exhibit A, the previously adopted and acknowledged Springfield TSP demonstrated that the TSP is consistent with the 2002 TransPlan.

As previously noted in the City’s TSP findings:

“the 2002 TransPlan will still serve as the Regional Transportation System Plan (RTSP) for Eugene and Springfield until the new RTSP is adopted. An updated RTSP is being worked on through a regional process as outlined in a work plan agreed to with the Land Conservation and Development Commission. This regional process will enable the full effect of Springfield’s policies and priorities, the City of Eugene’s Envision Eugene strategies and multimodal projects and LTD’s final transit network to be appropriately represented within the LCOG travel demand model. At that time, both cities and the region can establish and evaluate key performance statistics to replace and/or supplement those included in TransPlan that allow the cities and the region to monitor over time progress toward this TSP criteria. Further, as noted previously although the horizon years for Springfield’s TSP and the RTP are different than that of TransPlan, the total population and employment estimates, upon which the recommended multimodal projects and policies in the TSP are based, are consistent. Detailed information received from LCOG provides the following information:

- *The 2002 TransPlan modeled year 2020 total Population estimates for the Metro Area as 325,400; year 2025 total population was forecast as 351,263. The Springfield TSP is based on a total population for the Metro Area of 316,452 people, less than that of TransPlan.*
- *The 2002 TransPlan modeled year 2020 covered employment of 164,100 jobs; year 2025 forecasts reflect 176,004 jobs. The Springfield TSP accounts for only 164,110 in the region.*

Based on these population and employment forecast comparisons, it can be concluded that the travel demand forecasts associated with the needs, projects, and policies identified in the 2035 Springfield TSP are less than the 2025 TransPlan travel demand forecasts. As a result, from an operational forecast standpoint, the 2035 Springfield TSP is consistent with TransPlan and can serve as the benchmark for meeting this criterion until such a time that the ongoing regional process is complete. (emphasis added)

³⁵ Ibid.

Conclusion 660-009-0000(1): The acknowledged Springfield TSP, including the travel demand model, and the 2030 Plan amendments were coordinated to advance the objectives of OAR 660-009-0000(1).

OAR 660-012-0000(2)

The stated purpose (2) of Division 12:

“In meeting the purposes described in section (1), coordinated land use and transportation plans should ensure that the planned transportation system supports a pattern of travel and land use in urban areas that will avoid the air pollution, traffic and livability problems faced by other large urban areas of the country through measures designed to increase transportation choices and make more efficient use of the existing transportation system.”
(emphasis added)

OAR 660-012-0000(3)

The stated purpose (3) of Division 12 addresses coordination of land use and transportation planning:

“Coordinating land use and transportation planning will also complement efforts to meet other state and local objectives, including containing urban development, reducing the cost of public services, protecting farm and forest land, reducing air, water and noise pollution, conserving energy and reducing emissions of greenhouse gases that contribute to global climate change.” (emphasis added)

“(a) In all urban areas, coordinated land use and transportation plans are intended to provide safe and convenient vehicular circulation and to enhance, promote and facilitate safe and convenient pedestrian and bicycle travel by planning a well-connected network of streets and supporting improvements for all travel modes. (emphasis added)

(b) In urban areas that contain a population greater than 25,000 persons, coordinated land use and transportation plans are intended to improve livability and accessibility by promoting the provision of transit service where feasible and more efficient performance of existing transportation facilities through transportation system management and demand management measures. (emphasis added)

(c) Within metropolitan areas, coordinated land use and transportation plans are intended to improve livability and accessibility by promoting changes in the transportation system and land use patterns. A key outcome of this effort is a reduction in reliance on single occupant automobile use, particularly during peak periods. To accomplish this outcome, this division

promotes increased planning for alternative modes and street connectivity and encourages land use patterns throughout urban areas that make it more convenient for people to walk, bicycle, use transit, use automobile travel more efficiently, and drive less to meet their daily needs. The result of applying these portions of the division will vary within metropolitan areas. Some parts of urban areas, such as downtowns, pedestrian districts, transit-oriented developments and other mixed-use, pedestrian-friendly centers, will be highly convenient for a variety of modes, including walking, bicycling and transit, while others will be auto-oriented and include more modest measures to accommodate access and circulation by other modes.”
(emphasis added)

The RTSP and TSP promote increased planning for alternative modes and street connectivity.

The Springfield 2035 TSP contains multiple goals and polices which support implementation of OAR 660-012-0000(3) and Springfield’s existing and proposed plan designations, existing land use efficiency measures and new 2030 Plan policies. These TSP policies include, but are not limited to:

TSP Goal 1: Community Development – Provide an efficient, sustainable, diverse, and environmentally sound transportation system that supports and enhances Springfield’s economy and land use patterns.

TSP Policy 1.3: Provide a multi-modal transportation system that supports mixed-use areas, major employment centers, recreation, commercial, residential, and public developments, to reduce reliance on single-occupancy vehicles (SOVs).

TSP Policy 2.3: Expand existing Transportation Demand Management (TDM) programs related to carpooling, alternate work schedules, walking, bicycling, and transit use in order to reduce peak hour congestion and reliance on SOVs.

TSP Policy 2.5: Coordinate with Lane Transit District (LTD) to increase the transit system’s accessibility and convenience for all users, including the transportation-disadvantaged population. (NOTE Action 2: Monitor and adjust bus stop locations as needed to support surrounding land uses and provide more efficient and safe service).

TSP Goal 3: System Design: Enhance and expand Springfield’s transportation system design to provide a complete range of transportation mode choices.

TSP Policy 3.2: Expand and enhance Springfield’s bikeway system and provide bicycle system support facilities to both new development and redevelopment / expansion.

TSP Policy 3.3: *Street design standards should be flexible and allow appropriate-sized local, collector, and arterial streets based upon traffic flow, geography, efficient land use, social, economic, and environmental impacts.*

TSP Policy 3.7: *Provide for a pedestrian environment that supports adjacent land uses and is designed to enhance the safety, comfort, and convenience of walking by providing direct routes and removing barriers when possible.*

TSP Policy 3.8: *Coordinate the design of Springfield's transportation system with relevant local, regional, and state agencies. (NOTE Action #3 – Partner with LTD to provide frequent transit network connections along major corridors. Frequent transit network should connect to local neighborhood bus service and major activity center to provide viable alternatives to vehicle trips).*

The 2030 Plan amendments support and advance TSP and RTSP coordinated land use and transportation planning policies and measures designed to increase transportation choices and make more efficient use of the existing transportation system. The City and Lane County adopted 2030 Plan policies and implementation strategies that are supportive of land use patterns that make it more convenient for people to walk, bicycle, use transit, use automobile travel more efficiently, and drive less to meet their daily needs.

2030 Plan policies and the UGB amendment direct planned employment growth to existing employment centers and corridors serviced by the region's existing and planned public transit network. The UGB Alternatives Analysis considered "containing urban development, reducing the cost of public services, protecting farm and forest land, reducing air, water and noise pollution, conserving energy and reducing emissions of greenhouse gases that contribute to global climate change" when it compared the advantages and disadvantage of alternative expansion areas. The City's policy choices to absorb growth within the existing UGB, to reduce the size of the UGB expansion, and to expand the UGB expansion into two sites immediately adjacent to existing, developed industrial zones reduces VMT and the associated energy, air quality, GHG impacts compared to expanding into land more distant from the City.³⁶

2030 Plan Urbanization Element Policy 51 states:

"Grow and develop the City in ways that maintain and improve Springfield's air quality to benefit public health and the environment.

- ***Prioritize and seek funding for mixed use land use district planning and multi-modal transportation projects that reduce reliance on single occupancy***

³⁶ The City's findings under Goal 14, page 388 explain how comparative VMT associated impacts were considered in the UGB Boundary Alternatives Analysis conducted under OAR 660-024-0060.

vehicles (SOVs) consistent with Springfield Transportation System Plan (TSP) Policy 1.2, 1.3 and 1.4.

- **Coordinate land use and transportation system planning for urbanizable lands at the refinement plan and/or Master Plan level to identify and conceptually plan alignments for locating multi – modal facilities.**
- **Plan, zone and design transportation systems in the North Gateway and Mill Race Urban Holding Area - Employment districts to provide multi-modal transportation choices for district employees.**
- **Promote the use of active transportation systems as new growth areas and significant new infrastructure are planned and developed.”**

2030 Comprehensive Plan policies to guide future transportation system planning. To address Goal 12, the City and Lane County adopted policies in the 2030 Plan Urbanization Element to guide future transportation system planning to serve the lands added to the UGB through the subject UGB amendment:

2030 Plan Urbanization Element Policy 23 states:

“Amend the Gateway Refinement Plan to include the North Gateway UHA-E area prior to or concurrent with approval of an owner-initiated plan amendment or zone change that allows urban development in the North Gateway UHA-E area. The amended Gateway Refinement Plan shall describe the logical extension of transportation and public facilities to serve the entire North Gateway UHA-E area.”

2030 Plan Urbanization Element Policy 39 states:

“The North Gateway and Mill Race districts shall be planned and designed to encourage and support the availability of a variety of transportation choices for moving people that balance vehicular use with other transportation modes, including walking, bicycling and transit in order to avoid principal reliance upon any one mode of transportation; support the mobility needs of the transportation disadvantaged; and provide for safe and convenient vehicular, transit, pedestrian, and bicycle access and circulation. Plan and zoning amendments shall include a transportation system analysis and plan to demonstrate compliance with Statewide planning Goal 12 and Goal 12 administrative rules.”

2030 Plan Urbanization Element Policy 40 states:

“Public transportation systems shall be designed to facilitate future extension of the public transit system to serve the North Gateway district.”

2030 Plan Urbanization Element Policy 27 states:

***“The coordinated, timely provision of urban services is a central element of the City’s comprehensive growth management strategy for infill, redevelopment and new development. Development undertaken in pursuit of housing goals, diversifying the economy and neighborhood livability shall occur only after the logical and efficient delivery of all urban services have been provided to these sites.*”**

- ***Prepare and adopt comprehensive plan and zoning updates at the neighborhood, district, and corridor scale to determine the density, character and design of urban development in alignment with infrastructure capacity to ensure efficient and economical delivery of urban services in balance with the City’s financial resources.”***

2030 Plan Urbanization Element Policy 28 states:

“Regionally significant public investments within Springfield’s UGB shall be planned on a metropolitan-wide basis, as described in the regional transportation and public facilities plans.”

2030 Plan Urbanization Element Policy 24 states:

“Lands added to the UGB in 2016 for employment, public facilities, parks, open space and recreation in the Mill Race area shall be comprehensively planned in the context of a larger Mill Race District that includes the Booth Kelly Mixed Use site and the industrially-zoned lands south of the railroad corridor. The plan shall identify opportunities for integrating economic development, recreation, arts, culture, historic interpretation, and pedestrian/bicycle connectivity between the Middle Fork Willamette River and Downtown District; and shall identify development standards that protect Drinking Water Source Areas and other natural resources from incompatible development.”

Conclusion 660-012-0000(2) and (3): The acknowledged Springfield TSP and 2030 Plan amendments were coordinated to advance the objectives of OAR 660-012-0000(2) and (3).

OAR 660-012-0015(3)

OAR 660-012-0015(4)

OAR 660-012-0016(1)

As previously explained, Springfield has acknowledged regional and local Transportation System Plans establishing a system of transportation facilities and services adequate to meet identified local transportation needs, consistent with adopted elements of the state TSP, as required in OAR 660-012-0015(3) and (4), and OAR 660-012-0016(1)

OAR 660-012-0020 Elements of Transportation System Plans

OAR 660-012-0025 Complying with the Goals in Preparing Transportation System Plans; Refinement Plans

Springfield's comprehensive plan — consisting of the acknowledged Metro Plan as further refined and augmented through acknowledgement of the local TSP, Springfield 2030 Comprehensive Plan and Springfield's seven acknowledged neighborhood refinement plans — coordinate land use planning with the local and regional transportation plans allocating urban population density and employment to designated centers and other identified areas in the MPO to provide for implementation of the metropolitan area's integrated land use and transportation plan or strategy.

Springfield's TSP was previously acknowledged to be consistent with Division 12 and the Central Lane MPO's Regional Transportation Plan (RTP). TSPs for cities and counties located within an MPO area must be consistent with both the Division 12 Transportation Planning Rule (TPR) and the MPO's Regional Transportation Plan (RTP), which is adopted to meet Federal requirements. The TPR distinguishes requirements for communities based on population size. Given Springfield's population and the fact that it is a member of the Central Lane MPO, the following elements addressed in the acknowledged Springfield TSP:

- A determination of transportation system needs;
- State, regional, and local transportation needs;
- Needs of the transportation disadvantaged;
- Needs for movement of goods and services to support industrial and commercial development planned for pursuant to OAR 660-009 and Goal 9;
- Calculation of local and regional transportation needs based upon accomplishment of the requirement in OAR 660-012-0035(4) to reduce reliance on the automobile;
- System design to support increasing transportation choices and reducing automobile reliance;
- A road plan for a system of arterials and collectors and standards for the layout of local streets and other important non-collector street connections.
- Functional classifications of roads in the Springfield TSP are consistent with functional classifications of roads in state and regional TSPs and provide for continuity between adjacent jurisdictions;
- The standards for the layout of local streets shall provide for safe and convenient bike and pedestrian circulation necessary to carry out OAR 660-012-0045(3)(b);
- New connections to arterials and state highways consistent with designated access management categories;

- A public transportation plan that describes public transportation services for the transportation disadvantaged and identifies service inadequacies; intercity bus and passenger rail service and identifies the location of terminals; and identifies existing and planned transit trunk routes, exclusive transit ways, terminals and major transfer stations, major transit stops, and park-and-ride stations;
- A bicycle and pedestrian plan for a network of bicycle and pedestrian routes throughout the planning area consistent with the requirements of ORS 366.514;
- A rail, water and pipeline transportation plan which identifies where mainline and branchline railroads and railroad facilities, port facilities, and major regional pipelines and terminals are located or planned within the planning area;
- A plan for transportation system management and demand management;
- A parking plan as provided in OAR 660-012-0045(5)(c);
- Policies and land use regulations for implementing the TSP as provided in OAR 660-012-0045

The TSP supersedes *TransPlan* as the City's specific refinement of the Eugene-Springfield Comprehensive General Plan (Metro Plan) insofar as it affects land within the existing Springfield UGB. The TSP adoption findings confirmed that the TSP is consistent with the Metro Plan and *TransPlan*. *TransPlan* will remain in effect as the region's Regional Transportation System Plan (RTSP) until such time as a new RTSP is adopted by the partner jurisdictions. An updated *RTSP* is being developed through a regional process as outlined in a work plan agreed to with the Land Conservation and Development Commission.³⁷

The Springfield 2035 Transportation System Plan (2035 TSP) meets state requirements for a transportation system plan and is a resource for future transportation decision making. The 2035 TSP identifies the preferred future multi-modal transportation system and the City's policies related to the transportation system. It also identifies the function, capacity, and location of future facilities, and identifies planning-level costs for needed improvements to support expected development and growth and possible sources of system funding. This TSP is intended to provide the City with flexibility as staff, the public, and decision makers prioritize and fund critical transportation investments. The TSP provides:

- *A blueprint for transportation investment*
- *A tool for coordination with regional agencies and local jurisdictions*
- *Information to ensure prudent and effective land use choices*
- *Solutions to address existing and future transportation needs for bicycles, pedestrians, transit, vehicles, freight, and rail*

The TSP is the transportation element of and a supporting document to Springfield's current comprehensive planning document (Metro Plan, 2004 update) as required by state law. The City

³⁷ Springfield Ordinance 6314

updated the 2035 TSP goals and policies during the planning process to implement the Goal 12: Transportation Element of the Metro Plan.

Oregon Transportation Plan (OTP) Policy 2.2 – Management of Assets “It is the policy of the State of Oregon to manage transportation assets to extend their life and reduce maintenance costs.”

The 2030 Plan addresses transportation/land use planning coordination for employment sites added to the UGB. Urbanization Element Policy 38 requires that the TSP be updated and adopted prior to or concurrently with any plan or zoning amendment that allows an increase in trips over levels permitted in the AG zone and before any urban level development can occur in the UGB expansion areas:

“To ensure that changes to the Springfield Comprehensive Plan are supported by adequate planned transportation facilities, the City shall update and adopt amendments to the Springfield Transportation System Plan (TSP) to identify facilities that may be needed to provide and encourage a safe, convenient and economic multi-modal transportation system to support development of urban uses and densities in the North Gateway and Mill Race areas. The TSP update shall be coordinated with City-initiated comprehensive land use planning or owner-initiated plan amendments and shall be prepared and adopted prior to or concurrently with any plan or zoning amendment that allows an increase in trips over the levels permitted in the AG zone.” (emphasis added)

Urbanization Element Policy 39 requires:

“The North Gateway and Mill Race districts shall be planned and designed to encourage and support the availability of a variety of transportation choices for moving people that balance vehicular use with other transportation modes, including walking, bicycling and transit in order to avoid principal reliance upon any one mode of transportation; support the mobility needs of the transportation disadvantaged; and provide for safe and convenient vehicular, transit, pedestrian, and bicycle access and circulation. Plan and zoning amendments shall include a transportation system analysis and plan to demonstrate compliance with Statewide planning Goal 12 and Goal 12 administrative rules.” (emphasis added)

Urbanization Element Policy 49 prohibits regional retail uses in the UGB expansion areas:

“Employment Lands designated UHA-E shall be planned and zoned as economic districts that provide and promote suitable sites for clean manufacturing³⁸ uses and office/tech/flex employers in Springfield’s target industry sectors. Limited

³⁸ For the purposes of this policy, “clean” is defined as land uses, construction practices, and business operations that minimize waste and environmental impacts, and that contribute to a safe, healthy, and clean community, maintain the aquifer recharge capacity of the site by reducing impervious surfaces, and protect Springfield’s drinking water source areas from contamination.

neighborhood-scale retail uses that primarily serve employees within an industrial or office building or complex may be permitted as a secondary element within employment mixed-use zones. Urban Holding Area-Employment (UHA- E) sites shall not be re-designated or zoned to permit development of regional retail commercial uses. (emphasis added)

Springfield's existing transportation capacity and operational efficiency was measured through the TSP process. Future transportation capacity and operational efficiency will be measured through use of Lane Council of Governments (LCOG) Regional Transportation Model.

The acknowledged TSP is consistent with the statewide Transportation Planning Rule and the Central Lane MPO's Regional Transportation Plan (RTP) as required under OAR 660-012-0016. TSPs for cities and counties located within an MPO area must be consistent with both the statewide Transportation Planning Rule and the MPO's Regional Transportation Plan (RTP), which is adopted to meet Federal requirements.

The Central Lane MPO RTP meets federal guidelines for the area and guides regional transportation system planning and development. The RTP currently has a planning horizon that goes beyond the planning horizons of the Metro Plan and *TransPlan*. The RTP is updated every four years. Springfield's TSP is consistent with the most currently updated RTP.

The 2030 Plan Springfield's comprehensive plan and the proposed 2030 Plan elements and UGB amendment has been coordinated with the RTP.

Conclusion 660-012-0020, OAR 660-012-0025, OAR 660-012-0030 (1), (2). The acknowledged Springfield TSP and 2030 Plan amendments were coordinated to comply with 660-012-0020, OAR and 660-012-0025.

OAR 660-012-0030 Determination of Transportation Needs

OAR 660-012-0030(1)

OAR 660-012-0030(2)

Conclusion OAR 660-012-0030 (1) and (2). The acknowledged Springfield TSP and 2030 Plan Economic and Urbanization Element policies and UGB amendments were coordinated to identify transportation needs relevant to the planning area including state, regional and local needs; the needs of the transportation disadvantaged; the needs for movement of goods and services to support industrial and commercial development as described in the City's findings under Goal 9 and Goal 14. The TSP is acknowledged to be in compliance with OAR 660-009-0030 (1), and (2). Future updates to the TSP are required to address the needs for movement of goods and services to support industrial and commercial development in the UGB expansion areas, as required by 2030 Urbanization Element policies³⁹ and

³⁹ Exhibit C-1Urbanization Element Policy 38 and 39

Springfield Development Code land use regulations adopted by the City and Lane County in Ordinance Exhibits C-1 and E.

OAR 660-012-0030(3)

“Within urban growth boundaries, the determination of local and regional transportation needs shall be based upon:

(a) Population and employment forecasts and distributions that are consistent with the acknowledged comprehensive plan, including those policies that implement Goal 14.

Forecasts and distributions shall be for 20 years and, if desired, for longer periods; and

(b) Measures adopted pursuant to OAR 660-012-0045 to encourage reduced reliance on the automobile.”

The planning year horizon for the acknowledged Springfield TSP is 2035, consistent with the Regional Transportation Plan (RTP), which is also 2035. The planning year horizon for the current RTSP (i.e. TransPlan) is 2025 (as amended in 2010).

Springfield’s previously acknowledged UGB provides adequate residential land to accommodate the forecast population growth for the 2010-2030 planning period by designating land to meet the City’s deficit of high density residential land.⁴⁰ The acknowledged TSP was planned in coordination with the 2010-2030 forecast residential land need. The transportation model used in the Springfield TSP used the Springfield 2035 BUILD 1 (full build) model, which incorporates the Springfield 2030 land use plan. The coordinated population for Springfield created by PSU/PRC was used to derive population and housing growth for the model study area.⁴¹ The employment forecast was made by LCOG based on historical trends. Land use was allocated in the TSP as described in the acknowledged Springfield Residential Land Use and Housing Element.⁴² The determination of transportation needs in the TSP was based on measures adopted pursuant to OAR 660-012-0045 to encourage reduced reliance on the automobile. 2010-2030 residential growth needs were addressed in the TSP. The planned transportation system addresses transportation needs.

It is important to note that based on the population and employment forecast comparisons used in the recent transportation system modelling work, “it can be concluded that the travel demand forecasts associated with the needs, projects, and policies identified in the 2035 Springfield TSP are less than the

⁴⁰ Springfield Ordinance 6316 Glenwood Refinement Plan Phase One amendments included measures adopted pursuant to OAR 660-012-0045 to encourage reduced reliance on the automobile.

⁴¹ For more detailed information see Springfield Ordinance No. 6314, Springfield File No. TYP413-00009, TSP Staff Report Exhibit A 2/24/14.

⁴² For example, the TSP allocated high density residential land uses in the Glenwood Residential Mixed-Use district, based on the Glenwood Refinement Plan Phase One plan amendments and Glenwood Plan District zoning code. The area is designed Mixed Use Nodal Development in the Metro Plan and was granted one of the first Multi-modal Mixed Use Area (MMA) designations in the state.

2025 TransPlan travel demand forecasts. As a result, from an operational forecast standpoint, the 2035 Springfield TSP is consistent with TransPlan.”⁴³

TSP Update to address 2030 UGB/Employment Forecast. Springfield’s CIBL/EOA identified a need to expand the UGB to accommodate future employment land needs. Because a UGB expansion had not yet occurred when the TSP was adopted, the TSP addressed land uses within Springfield’s existing UGB. Subsequent to acknowledgement of the 2030 Plan and UGB amendment, the TSP will need to be updated as necessary before any urban level development that increases trips over existing rural levels can occur in the UGB expansion areas.⁴⁴ As previously stated, the 2030 Urbanization Element policies (Ordinance Exhibit A-2, C-1, D) and Springfield Development Code land use regulations (Ordinance Exhibit A-3 and E) adopted by the City and Lane County ensure that the TSP is updated to reflect the Springfield 2030 employment forecast adopted into the Comprehensive Plan (Ordinance Exhibit B-2) and to provide distributions that are consistent with the comprehensive plan as amended through acknowledgement of the subject ordinance, including the 2030 Plan designations and policies that implement Goal 14.

2030 Plan Urbanization Element Policy 38 states:

“To ensure that changes to the Springfield Comprehensive Plan are supported by adequate planned transportation facilities, the City shall update and adopt amendments to the Springfield Transportation System Plan (TSP) to identify facilities that may be needed to provide and encourage a safe, convenient and economic multi-modal transportation system to support development of urban uses and densities in the North Gateway and Mill Race areas. The TSP update shall be coordinated with City-initiated comprehensive land use planning or owner-initiated plan amendments and shall be prepared and adopted prior to or concurrently with any plan or zoning amendment that allows an increase in trips over the levels permitted in the AG zone.”

The City’s findings under Goal 14, (pages 212-235 of this report, and Tables 5, 11, and 17) identify the facilities plans the City to determine infrastructure and public facilities needs in the Boundary Alternatives Analysis. The City’s findings under Goal 14, Factor 3 ESEE Consequences p. 388-393 address transportation impacts related to distance from the city and from major transportation facilities.

Vehicle Miles Travelled

Conclusion OAR 660-012-0030 (3). The acknowledged Springfield TSP was coordinated with Springfield 2030 population forecasts and land use distributions that are consistent with the acknowledged comprehensive plan. The 2030 Plan amendments require transportation planning updates prior to any

⁴³ Springfield Ordinance No. 6314, Springfield File No. TYP413-00009, TSP Staff Report Exhibit A 2/24/14, p. 3.

⁴⁴ As explained in the City’s detailed findings under Goal 14 Public Facilities Analyses, and supported by evidence in the form of maps and adopted facilities plans in the local record, both UGB expansion areas would be served by existing or planned transportation facilities or projects already assumed and identified in the TSP.

plan or zoning amendment that allows urban levels of development in the UGB expansion areas designated UHA-E. The acknowledged Springfield TSP and comprehensive plan, and the subject 2030 Plan amendments support implementation of land use patterns and transportation system improvements to encourage reduced reliance on the automobile.

OAR 660-012-0035(1),(3),(4) and (5)

Transportation and land use coordination policies intended to provide a transportation system to support economic development and goods movement while reducing reliance on the automobile were relevant to the Springfield 2035 TSP and are relevant to 2030 Plan. The findings for the TSP⁴⁵ provide explanation:

“The 2035 Springfield TSP is also consistent with the 2002 TransPlan from a goals and policy standpoint. Attachment B is a memorandum that provides a comparison and consistency evaluation between the draft goals for the RTSP update and policies contained in the Eugene, Springfield, and Coburg TSPs currently being prepared, and the existing Lane County TSPs and TransPlan. Each of these documents has very similar goal and policy objectives and in no way in conflict with each other to the extent that any one plan might undermine the implementation of another. It should be noted that while the Springfield 2035 TSP does not specifically address or include the nodal growth policies that are identified in the 2002 TransPlan, there is nothing in the 2035 Springfield TSP that would inhibit or discourage the potential for growth in the nodal areas that have already been established in Springfield’s current comprehensive land use planning document (Metro Plan, 2004 update) and enabled through the City’s zoning and development code. Additionally, a similar or greater lever of alternative travel mode projects are identified for implementation in these areas compared to TransPlan. Consequently, with the 2002 TransPlan still in effect as the adopted RTSP for the Central Lane MPO area and with the Metro Plan still serving as the City’s comprehensive land use planning document, adoption of the 2035 Springfield TSP will not interfere with or undermine continued implementation and evaluation of TPR compliance or progress as periodically assessed through the currently adopted 2002 TransPlan performance measures.” (emphasis added)

As stated in TSP staff report⁴⁶, the projects, plans and policies in the acknowledged TSP support implementation of the 2002 TransPlan performance measures:

“The TSP policies in Chapter 2, the transportation planning toolbox and the recommended projects in Chapter 5 are all based on the premise of reducing reliance on the automobile in the future. The majority of the recommended projects are either

⁴⁵ Springfield Ordinance No. 6314, Springfield File No. TYP413-00009, TSP Staff Report Exhibit A 2/24/14, p. 4-35.

⁴⁶ Springfield Ordinance No. 6314, Springfield File No. TYP413-00009, TSP Staff Report, Attachment 1, p. 15.

transit, new off-street pedestrian and bicycle facilities, and/or upgrades to existing streets to add pedestrian and bicycle features. There are very few projects aimed solely at facilitating motor vehicle mobility. Further, the city is exploring alternative mobility standards at key locations to reduce the need for and impact of roadway improvement projects on state facilities.” (emphasis added)

“In addition, the land use allocation of jobs and households that serves as the basis for the LCOG travel demand model focuses the majority of the growth in key redevelopment opportunity areas within the City, such as the Glenwood Riverfront Area, Downtown, Gateway, and Jasper-Natron. Noted in TransPlan as nodal areas, these areas are intended as mixed use, high density environments that will require a robust pedestrian, bicycle and transit infrastructure.” (emphasis added)

The 2030 Plan designates employment land to provide efficient freight/goods movement to support economic development.

Metro Plan Transportation Element p. III-F-11 states:

“The OTP recognizes that goods movement of all types makes a significant contribution to the region’s economy and wealth and contributes to residents’ quality of life. OTP Policy 3A promotes a balanced freight transportation system that takes advantage of the inherent efficiencies of each mode.”

“Goods movement is directly supported by system-wide and roadway transportation system improvements.”

The 2030 Plan provides coordinated land use and transportation policies intended to provide a transportation system to support economic development and goods movement — consistent with Metro Plan Transportation Element Policy F.29 which states:

“Support reasonable and reliable travel times for freight/goods movement in the Eugene Springfield region.”

The 2030 Plan designates employment growth areas with convenient access to I-5, and State Highways and truck routes to facilitate movement of goods.

Metro Plan Transportation Element p. III-F-1 describes the transportation planning strategies addressed in the Metro Plan Transportation Element to implement a safe, convenient, and economic transportation system in compliance with Goal 12:

“Three types of transportation planning strategies are reflected in the goals and policies in this element: transportation demand management (TDM), land use, and system improvements. TDM strategies focus on reducing demands placed on the transportation system, and thus system costs, by providing incentives to redistribute or

eliminate vehicle trips and by encouraging alternative modes. Land use strategies focus on encouraging development patterns that reduce the need for automobiles, reduce trip lengths, and support the use of alternative modes. System improvements focus on increasing efficiency and adding capacity or new facilities to the existing highway, transit, bicycle, and pedestrian systems. (emphasis added).

Together, these strategies form a balanced policy framework for meeting local and state transportation goals to: increase urban public transit rider-ship; reduce reliance on the automobile; substitute automobile trips with alternative modes, such as walking and biking; and reduce automobile energy consumption and transportation costs.

Not all Transportation Element policies will apply to a specific transportation-related decision. When conformance with adopted policy is required, policies in this and other Metro Plan elements will be examined to determine which policies are relevant and can be applied. When policies support varying positions, decision makers will seek a balance of all applicable policies. Goals are timeless, but some policies will expire as they are implemented.”

As stated in the adopted Springfield TSP findings, Springfield Ordinance 6314 Exhibit A:

“However, it should be noted that the 2002 TransPlan continues to serve as the region’s Transportation Planning Rule (TPR) required RTSP until such time as a new RTSP is adopted by the appropriate MPO jurisdictions. The performance measures by which progress towards meeting TPR requirements over the TransPlan planning horizon are evaluated for the Central Lane MPO area shall also remain in effect until (1) both Eugene and Springfield have completed updates to their land use and transportation plans, (2) a new assessment (based on analysis from both new local TSPs) of how well the Region is addressing TPR requirements is completed, (3) a determination of how or if the current performance measures need to be updated is completed, and (4) a new RTSP is completed and adopted. Because it is important that the local TSP for Springfield continues to support the policies and general objectives of the 2002 TransPlan until a new RTSP is adopted, Staff has prepared findings confirming that the Springfield TSP is consistent with the 2002 TransPlan.”

As stated in the adopted Springfield TSP findings, Springfield Ordinance 6314 Exhibit A:

“For the purpose of serving as Springfield’s local TSP, TransPlan will be replaced by the Springfield 2035 TSP. However, TransPlan will continue to serve as the Regional Transportation System Plan (RTSP) for Eugene and Springfield until a new RTSP is adopted. An updated RTSP is being developed through a regional process described in a work plan agreed to with the Land Conservation and Development Commission. The Central Lane MPO member jurisdictions are in the process of refining the task details

and timelines in the existing RTSP update work plan with LCDC to more accurately reflect the coordination challenges and various dependencies between the RTSP, local TSP, and land use planning work that is underway. This includes future work needed to assess compliance with the TPR per capita VMT reduction requirements or assess and incorporate updated performance measures in the Regional Transportation System Plan (RTSP) based on the analysis conducted for the Springfield and Eugene TSPs after each local TSP is reconciled with any land use plan changes that are made through the processes that are currently underway. As previously noted, until that work is complete, the current 2002 TransPlan and its performance measures will remain in effect.”
(emphasis added)

Metro Plan Transportation Element Policies F.1, F.2, F.3, and F.4 coordinating transportation planning with plan use planning are implemented through the projects, programs and policies in the Springfield TSP and through Springfield’s acknowledged comprehensive plan land use designations and land use regulations.

Policy F.1: “Apply the nodal development strategy in areas selected by each jurisdiction that have identified potential for this type of transportation-efficient land use pattern.”

Policy F.2: “Support application of the nodal development strategy in designated areas through information, technical assistance, or incentives.”

Policy F.3: “Provide for transit-supportive land use patterns and development, including higher intensity, transit-oriented development along major transit corridors and near transit stations; medium- and high-density residential development within ¼ mile of transit stations, major transit corridors, employment centers, and downtown areas; and development and redevelopment in designated areas that are or could be well served by existing or planned transit.”

Policy F.4: “Require improvements that encourage transit, bicycles, and pedestrians in new commercial, public, mixed use, and multi-unit residential development.”

The Metro Plan⁴⁷ defines Nodal development (node) as follows:

Nodal development (node): Nodal development is a mixed-use, pedestrian-friendly land use pattern that seeks to increase concentrations of population and employment in well-defined areas with good transit service, a mix of diverse and compatible land uses, and public and private improvements designed to be pedestrian and transit oriented. Fundamental characteristics of nodal development require:

- Design elements that support pedestrian environments and encourage transit use, walking and bicycling;

⁴⁷ Metro Plan Chapter V Glossary, p.V-4.

- A transit stop which is within walking distance (generally ¼ mile) of anywhere in the node);
- Mixed uses so that services are available within walking distance;
- Public spaces, such as parks, public and private open space, and public facilities, that can be reached without driving; and
- A mix of housing types and residential densities that achieve an overall net density of at least 12 units per net acre.

Nodal developments will vary in the amount, type, and orientation of commercial, civic, and employment uses; target commercial floor area ratios; size of building; and the amount and types of residential uses.

As demonstrated in the TSP findings, the acknowledged Springfield TSP provides local comprehensive plan coordinated land use-transportation policies consistent with relevant Metro Plan Transportation Element Land Use Policies F.1, F.2, F.3, and F.4.

The subject 2030 Plan amendments (Ordinance Exhibits B, C, D and E) provide local comprehensive plan land use goals, policies and implementation strategies coordinated with transportation policies, programs, projects and strategies consistent with relevant Metro Plan Transportation Element Land Use Policies F.1, F.2, F.3, and F.4. The City's 2030 Plan emphasizes a compact urban growth pattern, by providing land to meet all employment land needs for sites smaller than 5 acres within the existing UGB.⁴⁸

The City's previously acknowledged 2030 Plan Residential Land and Housing Element Policies and land use efficiency measures and densities allocate all residential and housing growth needs to lands within the existing UGB.⁴⁹

The 2030 Comprehensive Plan Economic and Urbanization Elements address the integral relationship between transportation systems and land use in comprehensive planning through land use plan amendments and policies that direct urban development and urban expansion to areas identified as necessary and suitable for urban development; and through policies that address (1) the need for all modes of transportation to support economic development and livability including mass transit, rail, highway, bicycle and pedestrian; (2) the transportation needs of the workforce and target industry employers based on Springfield's Economic Opportunities Analysis; (3) avoiding principal reliance upon any one mode of transportation; (4) minimizing adverse social, economic and environmental impacts

⁴⁸ As explained in the CIBL/EOA and the City's findings under Goal 9.

⁴⁹ Acknowledged 2030 Residential Land Use and Housing Policy H.1 densities support transit: Residential Low Density 6-14 du/acre, Residential Special Density 8-14, Residential Medium Density 14-28 du/acre, Residential High Density 28-42 du/acre, Springfield Development Code Glenwood Plan District Residential Mixed Use 50 du/ac minimum, no maximum, Mixed Use Residential MUR 20 du/acre minimum; MUC no maximum. Policy H.3 and implementation actions 3.1, 3.2, 3.3, 3.4; Policy H.4; Policy H.5; Policy H.7 and implementation actions 7.1, 7.2, 7.4; Policy H.10; Policy H.13.

and costs; (5) conserving energy by reducing travel distance; (6) meeting the needs of the transportation disadvantaged by improving access to transportation services; and (7) locating employment centers to facilitate the flow of goods and services so as to strengthen the local, regional and state economy.

The employment forecast identifies a need to provide sites for 13,000 + new jobs through 2030. The integral relationship between transportation facilities and services and employment land uses was a consideration of utmost importance in the City's evaluation of options to accommodate employment growth and diversification of the economy. The City needs to expand the UGB to add 223 acres of suitable, large sites to its employment land inventory. Decreasing the distance needed to travel to and from these new employment and industrial areas added to the UGB and to and from redevelopment employment and industrial areas within the city is an important consideration used by the City to evaluate options for accommodating forecast employment growth. Suitable, well-located employment sites will facilitate the safe, efficient and economic flow of freight and other goods and services within the region and throughout the state. The City's Goal 14 Boundary Alternatives Analysis evaluated potential growth areas to determine whether new jobs would be located within ½ mile of planned centers, districts, and corridors served by the regions' Frequent Transit Network (FTN).

The 2030 Plan emphasizes and provides policy support for redevelopment and new development that increases capacity in areas served by transit. Needed employment in new employment areas added to the UGB, within existing employment areas and in redevelopment employment areas within the city should be located where adequate transportation facilities already exist, are planned or can be logically and efficiently extended to ensure that jobs are accessible via a choice of transportation modes including modes accessible to the transportation disadvantaged. The 2030 Comprehensive Plan allocates the majority of new jobs to employment land within ½ mile of planned centers, districts, and corridors served by the regions' Frequent Transit Network (FTN). Adding suitable large employment sites to existing city employment centers supports the availability of a variety of transportation choices for moving people that balance vehicular use with other transportation modes, including walking, bicycling and transit in order to avoid principal reliance upon any one mode of transportation. This strategy promotes equity and opportunity by ensuring that access to jobs is possible through the region's public transit network.

2030 Plan Urbanization Element Goal UG-1 states:

“Promote compact, orderly and efficient urban development by guiding future growth to vacant sites and redevelopment areas within the established areas of the city and to urbanizable lands where future annexation and development may occur.”

2030 Plan Urbanization Element Policy 2 states:

“Continue to support and facilitate redevelopment and efficient urbanization through City-initiated area-specific refinement planning and zoning amendments consistent with the policies of this Plan. Plans shall designate an adequate and competitive supply of land to facilitate short-term and long-term redevelopment activity. Efficiency measures achieved through plan amendments may be reflected in land

supply calculations to the extent that they are likely to increase capacity of land suitable and available to meet identified needs during the relevant planning period.

- ***Continue to provide public policy and financial support when possible for redevelopment in Springfield.***
- ***Continue to prioritize and incentivize redevelopment in the Glenwood and Downtown urban renewal districts and support redevelopment throughout the City as described in the Economic and Residential Elements of this Plan.***
- ***Continue to provide development tools and incentives (such as Urban Renewal support) within targeted priority redevelopment areas as resources become available to facilitate expedient and economically feasible redevelopment.***
- ***Continue to conduct focused planning in key redevelopment areas, as directed by the City Council, as resources are available. Such efforts will review, update and supersede existing refinement plan designations and policies.***
- ***Identify and include public agencies and private stakeholder partners in district-specific planning efforts to facilitate redevelopment through partnerships and other cooperative relationships.”***

2030 Plan Urbanization Element Goal UG-2 states:

“Promote efficient and economical patterns of mixed land uses and development densities that locate a variety of different life activities, such as employment, housing, shopping and recreation in convenient proximity; and where accessible by multiple modes of transportation — including walking, bicycling, and transit in addition to motor vehicles — both within and between neighborhoods and districts.”

2030 Plan Urbanization policies identify the City’s strategies for providing public incentives to assist redevelopment of sites to meet employment land needs, as resources are available.

2030 Plan Urbanization Element Policy 17 states:

“In new growth and redevelopment areas throughout the City, plan and support the transition to transportation-efficient land use patterns by providing incentives such as City-initiated plan and zoning updates, technical assistance, implementation of design standards, and permit processing assistance to guide the development of well-designed neighborhoods, efficient and economically viable mixed use districts and corridors.”

2030 Plan Urbanization Element Policy 18 states:

“Within districts and neighborhoods currently characterized by a limited range of land uses and activities, pursue comprehensive planning and zoning code updates to allow for mixed-use development at appropriate locations as one method of providing additional land use diversity and choices — as described in the Economic and Residential Land Use Elements of this plan.”

2030 Plan Urbanization Element Policy 19 states:

“Support new development and redevelopment in mixed use areas to address Springfield’s needs for housing, employment, and shopping opportunities in connected walkable neighborhood locations served by the region’s frequent transit network (FTN).”

2030 Plan Urbanization Element Policy 20 states:

“Plan and zone land to support transit-oriented land use patterns and development, including but not limited to higher intensity development in the City’s employment and commercial centers and along major transit corridors; employment uses located within ¼ mile of transit stations or stops; and residential development within ½ mile of transit stations or stops.”

2030 Plan Urbanization Element Policy 21 states:

“As permitted under Oregon law, require improvements in new commercial, public, mixed use, and multi-unit residential development that encourage walking, bicycling and the use of transit.”

2030 Plan Urbanization Element Policy 36 states:

“The City shall continue to seek funding opportunities and public-private partnerships to allow construction of key urban infrastructure elements to support pedestrian and transit-friendly redevelopment in Glenwood and Downtown, such as the Franklin Corridor multiway boulevard in Glenwood and enhancements to the Main Street/South A couplet through Downtown.”

2030 Plan Urbanization Element Policy 39 and 40 address multi modal transportation planning requirements for the UGB expansion areas:

“The North Gateway and Mill Race districts shall be planned and designed to encourage and support the availability of a variety of transportation choices for moving people that balance vehicular use with other transportation modes, including walking, bicycling and transit in order to avoid principal reliance upon any one mode of transportation; support the mobility needs of the transportation disadvantaged; and provide for safe and convenient vehicular, transit, pedestrian, and bicycle access and circulation. Plan and zoning amendments shall include a transportation system analysis and plan to demonstrate compliance with Statewide planning Goal 12 and Goal 12 administrative rules.” (Policy 39)

“Public transportation systems shall be designed to facilitate future extension of the public transit system to serve the North Gateway district.” (Policy 40)

The City’s North Gateway and Mill Race districts designate suitable employment land to provide additional employment capacity on sites immediately abutting land previously identified as “Potential Nodes” in TransPlan. This action designates land to expand existing employment areas in support of new employment occurring in walkable centers and corridors served by the region’s Frequent Transit Network.

2030 Plan Economic Element Policies support employment growth within existing Nodal Development (ND) designated areas (RiverBend: Ordinance 6241, Downtown: Ordinance 6146, Marcola Meadows – Ordinance 6195; Glenwood - Ordinance 6316); 30th and Main – Ordinance 6177); and approved Glenwood Mixed Use Multi Modal Areas (MMAs): Ordinance 6316; and existing employment centers served by transit, as described in the City’s findings under Goal 9. This action supports development of new employment occurring in connected, walkable employment centers and corridors served by the region’s Frequent Transit Network. Over 400 additional units of High Density Mixed-Use Residential housing are planned at the Glenwood site. 518 units of Medium Density Residential housing are planned at the Marcola Meadows site.⁵⁰

2030 Plan Economic Element Policies support designation and zoning of land to increase employment in Mixed-Use areas, as described in the City’s findings under Goal 9. This action supports development of new employment occurring in connected, walkable employment centers and corridors served by the region’s Frequent Transit Network.

The CIBL/EOA identified location relative to transit routes as a “characteristic of needed sites” for some of Springfield’s target industry employers that require sites larger than 5 acres, as described in the CIBL/EOA and in the City’s findings under Goal 9. This action supports development of needed larger employment sites and new employment occurring in connected, walkable employment centers and corridors served by the region’s Frequent Transit Network. An example of this pattern working in Springfield is the International Way and RiverBend employment center served by the Gateway EmX Bus Rapid Transit service.⁵¹ 730 units of Medium Density Residential housing are planned for the RiverBend site.⁵²

In the City’s 2030 Plan UGB Boundary Location Alternatives Analysis under Goal 14, the City considered location relative to transit routes as a “characteristic of needed sites” for some of Springfield’s target industry employers, and thus evaluated alternatives on the basis of being able to provide suitable sites

⁵⁰ Marcola Meadows Master Plan

⁵¹ LCDC toured this area and other developed nodal development and transit-served areas at a past Commission meeting in Springfield.

⁵² RiverBend Master Plan

for large employers in locations within a ½ mile of existing or planned Frequent Transit Network (FTN) public transit routes.

Conclusion OAR 660-012-0035(4) and (5): The subject 2030 Plan amendments include local comprehensive plan land use policies, land use designations and land use regulations that are coordinated with the acknowledged TSP and RTSP to support implementation of relevant Metro Plan Transportation Element and Use Policies F.1, F.2, F.3, and F.4 and relevant requirements of OAR 660-012-0035 (4) and (5).

Conclusions OAR 660-012-0035. The subject 2030 Plan amendments include local comprehensive plan Economic Element and Urbanization Element land use policies (Ordinance Exhibit B and C) coordinated with transportation policies to support provision of transit-supportive land use patterns and development, including higher intensity, transit-oriented development along major transit corridors and near transit stations; medium- and high-density residential development within ¼ mile of transit stations, major transit corridors, employment centers, and downtown areas; and development and redevelopment in designated areas that are or could be well served by existing or planned transit.

Existing acknowledged comprehensive plan policies, plan designations, zoning and Springfield Development Code and proposed 2030 Plan UGB, policies, plan designations, zoning and Springfield Development Code direct and regulate new residential, employment and mixed-use land uses to support achievement of transit-supportive land use patterns and development, including higher intensity, transit-oriented development along major transit corridors and near transit stations; medium- and high-density residential development within ¼ mile of transit stations, major transit corridors, employment centers, and downtown areas; and development and redevelopment in designated areas that are or could be well served by existing or planned transit.

OAR 660-024-0045 Implementation of the Transportation System Plan

(1) *“Each local government shall amend its land use regulations to implement the TSP.”*

(2) *“Local governments shall adopt land use or subdivision ordinance regulations, consistent with applicable federal and state requirements, to protect transportation facilities, corridors and sites for their identified functions. Such regulations shall include:*

(a) Access control measures, for example, driveway and public road spacing, median control and signal spacing standards, which are consistent with the functional classification of roads and consistent with limiting development on rural lands to rural uses and densities;

(b) Standards to protect future operation of roads, transitways and major transit corridors;

(c) Measures to protect public use airports by controlling land uses within airport noise corridors and imaginary surfaces, and by limiting physical hazards to air navigation;

(d) A process for coordinated review of future land use decisions affecting transportation facilities, corridors or sites;

(e) A process to apply conditions to development proposals in order to minimize impacts and protect transportation facilities, corridors or sites;

(f) Regulations to provide notice to public agencies providing transportation facilities and services, MPOs, and ODOT of:

(A) Land use applications that require public hearings;

(B) Subdivision and partition applications;

(C) Other applications which affect private access to roads; and

(D) Other applications within airport noise corridors and imaginary surfaces which affect airport operations; and

(g) Regulations assuring that amendments to land use designations, densities, and design standards are consistent with the functions, capacities and performance standards of facilities identified in the TSP.”

(3) “Local governments shall adopt land use or subdivision regulations for urban areas and rural communities as set forth below. The purposes of this section are to provide for safe and convenient pedestrian, bicycle and vehicular circulation consistent with access management standards and the function of affected streets, to ensure that new development provides on-site streets and accessways that provide reasonably direct routes for pedestrian and bicycle travel in areas where pedestrian and bicycle travel is likely if connections are provided, and which avoids wherever possible levels of automobile traffic which might interfere with or discourage pedestrian or bicycle travel.”

(4) To support transit in urban areas containing a population greater than 25,000, where the area is already served by a public transit system or where a determination has been made that a public transit system is feasible, local governments shall adopt land use and subdivision regulations as provided in (a)–(g) below...”

Springfield has land use regulations in place consistent with applicable federal and state requirements and laws, to protect transportation facilities, corridors and sites for their identified functions, including measures and land use development review procedures addressing the standards listed in OAR 660-012-0045(2)(a)-(g). In 2016 Springfield is conducting several projects that will update the Springfield Development Code and Engineering Design Standards Manual to enhance compliance with OAR 660-

012-0045. The TSP Implementation project updates development code and engineering design manual standards city-wide. TSP Appendix I “Plan Implementation and Recommended Ordinance/Code Language” outlines recommended code updates to implement the TSP.⁵³ While the existing SDC meets TPR standards, the TSP project will implement the updated policies found in TSP Chapter 2. The Downtown District Design Standards project updates standards applicable to land within the Downtown Refinement Plan. The Main Street Corridor Plan Phase Two project will create an innovative zoning code for the Main Street Corridor. Both projects address "safe and convenient" pedestrian and bicycle facility routes, facilities and improvements, bicycle and vehicular parking requirements and facilities, alleys, accessways, curb extensions, pedestrian crossings, facility designs to support transit use, and development standards listed in OAR 660-012-0045(4) and (5). The SDC (city-wide) allows provision of on-street parking and shared parking to meet minimum off-street parking requirements. The City’s acknowledged Glenwood Plan District code implements off-street parking maximums.

Springfield has land use regulations in place consistent with applicable federal and state requirements and laws, to protect transportation facilities, corridors and sites for their identified functions, including measures and land use development review procedures addressing the standards listed in OAR 660-012-0045(2)(a)-(g).

Springfield adopted new land use regulations that protect transportation facilities for their identified functions. The 2030 Plan designates and zones the lands added to the UGB to meet long range employment needs Urban Holding Area- Employment. The 2030 Plan applies 2030 Urbanization Element (Ordinance Exhibit C-2) policies requiring TSP and PFSP amendments prior to approval of rezoning for urban use as explained in Urbanization Element Table 5: pre-Development Approval Process Steps – Urban Holding Areas and Policies 38 and 39. The City and Lane County adopted and applied the AG-Urban Holding Area Zoning District (Ordinance Exhibits A, E) establishing land use regulations in SDC 3.2-915(A)(4) which states: ***“Proposed new uses or expansions of existing uses must demonstrate that the use will not generate vehicle trips exceeding pre-development levels.”*** AG zone SDC 3.2-930, Table 1. Pre-Development Approval Process Steps – Urban Holding Areas Table 1 provides an overview of the planning procedures required prior to rezoning land from Agriculture - Urban Holding Area (AG) to urban employment zoning designations (e.g. Employment, Employment Mixed Use, Campus Industrial, or Industrial), including the following two steps:

<u>Table 1. Pre-Development Approval Process Steps – Urban Holding Areas</u>	
<u>City-initiated Planning Process</u>	<u>Owner-initiated Planning Process</u>
1. <u>City prepares Plan Amendment to address all applicable Statewide Planning Goals (e.g. amended or new refinement plan or district plan), Metro Plan and Springfield Comprehensive Plan policies and Springfield Development Code standards.</u>	1. <u>Applicant submits request to City to initiate amendments to the Transportation System Plan and Public Facilities and Services Plan, and other city actions that may be required prior to plan amendment approval.</u>

⁵³ The recommended updates would amend SDC Sections 4.2, 4.6, and 3.2 (panhandle lots), Appendix I. p. 3-4.

<p><u>2. City and Lane County approve Plan Amendment to amend Metro Plan and Springfield Comprehensive Plan. UHA-E designation is replaced with employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, or Industrial). AG zoning remains in effect until Master Plan and new zoning are approved.</u></p>	<p><u>2. Applicant prepares and submits Plan Amendment application to address all applicable Statewide Planning Goals, Metro Plan and Springfield Comprehensive Plan policies, and Springfield Development Code standards. Applicant proposes employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, or Industrial).</u></p>
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Conclusions: OAR 660-12-0045. The 2030 Plan amendments and Springfield’s existing Development Code provide land use regulations consistent with applicable federal and state requirements and laws, to protect transportation facilities, corridors and sites for their identified functions, including measures and land use development review procedures addressing the standards listed in OAR 660-012-0045(2)(a)-(g).

OAR 660-012-0060 Plan and Land Use Regulation Amendments

OAR 660-024-0020 (1)(d) states:

“The transportation planning rule requirements under OAR 660-012-0060 need not be applied to a UGB amendment if the land added to the UGB is zoned as urbanizable land, either by retaining the zoning that was assigned prior to inclusion in the boundary or by assigning interim zoning that does not allow development that would generate more vehicle trips than development allowed by the zoning assigned prior to inclusion in the boundary;

Conclusions OAR 660-012-0060. The City and Lane County assigned the “Urban Holding Area – Employment (UHA-E)” comprehensive plan designation and “Agriculture – Urban Holding Area (AG)” interim zoning to the urbanizable employment lands added to the UGB in the City’s 2030 Plan amendments. The zoning does not allow development that would generate more vehicle trips than development permitted under the existing Lane County Agriculture zoning assigned prior to the inclusion of the lands in the UGB.

The UHA-E designation and AG zone establish an urban transition land use district that restricts interim uses to those already permitted under the existing Lane County Exclusive Farm Use (EFU) zoning. As permitted under OAR 660-024-0020 (1)(d), the OAR 660-012-0060 requirement to conduct a transportation impact analysis can be deferred until the analysis is needed to evaluate a proposed plan or zoning amendment that will allow urban development.

The subject 2030 Plan amendments do not trigger the transportation planning rule requirements under OAR 660-012-0060.

Adoption of the 2030 Plan UGB amendment triggers a need to update the Springfield Transportation System Plan prior to approval of plan designation or zoning amendments and annexation to allow urban development in the UHAs. Exhibit E SDC AG zone describes the required sequencing of these post-acknowledgement plan amendments prior to approval of any land use proposal that creates significant impacts above levels assumed by acknowledged Transportation Systems Plans.

Compliance with Section 60 of the TPR for lands inside the previously-acknowledged Springfield UGB.

The 2030 plan codifies and relies upon the acknowledged comprehensive plan designations, Metro Plan land use policies and TSP. Inside the current UGB, the 2030 Plan implements existing acknowledged comprehensive plan designations that were in place when the region's acknowledged transportation system plans and Springfield's local Transportation System Plan were adopted. Plan and zoning map designations interpreting and implementing those designations do not cause "significant impacts" within the meaning of the rule.

LUBA has determined that plan and zoning amendments do not have significant impacts under Section 60 to the extent that those amendments were in place and therefore necessarily assumed by acknowledged Transportation Systems Plans. The leading case on this issue is *Mason v. City of Corvallis*, 49 Or LUBA 199 (2005). In *Mason*, the subject decision rezoned land from low-density rural to urban low-density-residential (LDR) densities allowed under a city comprehensive plan designation that had been assumed in the city's acknowledged TSP.

Elements of the 2030 Plan that reflect, interpret, or implement comprehensive plan designations and other land use measures assumed by TransPlan/TSP do not have significant impacts within the meaning of Section 60 of the TPR.

The same is true of elements of the 2030 Plan that incorporate or otherwise reflect other post-acknowledgment plan or zoning amendment decisions that have become final and no longer subject to appeal. Those decisions are deemed "acknowledged" by operation of law and are presumed to have been made in full compliance with the LCDC's transportation goal and interpretive rule. See *Friends of Neabeack Hill v. City of Philomath*, 139 Or App 39, 911 P2d 350, rev. den. 323 Or 136(1996). Examples reflected in the draft 2030 Plan include post-acknowledgment amendments relating to RiverBend, the Sports Complex, Gateway Refinement Plan, Downtown Refinement Plan, and Glenwood Refinement Plan.

The 2030 Plan supports implementation of the TSP and Metro Plan Transportation Element policies addressing the following goals:

1. *"Provide an integrated transportation and land use system that supports choices in modes of travel and development patterns that will reduce reliance on the automobile and enhance livability, economic opportunity, and the quality of life."*
2. *"Enhance the Eugene-Springfield metropolitan area's quality of life and economic opportunity by providing a transportation system that is:*

- *Balanced,*
- *Accessible,*
- *Efficient,*
- *Safe,*
- *Interconnected,*
- *Environmentally responsible,*
- *Supportive of responsible and sustainable development,*
- *Responsive to community needs and neighborhood impacts, and*
- *Economically viable and financially stable.”*

As one strategy to achieve these goals, the Metro Plan policies in the Transportation Element address land use as follows:

“The Oregon Transportation Planning Rule (TPR) [OAR 660-012-0060(1)(c) and (d) and (5)] encourages plans to provide for mixed-use, pedestrian-friendly development, based on information that documents the benefits of such development and the Land Conservation and Development Commission’s (LCDC) policy interest in encouraging such development to reduce reliance on the automobile. The rule [OAR 660-012-0045(4)(a) and (e)] requires local governments to adopt land use regulations that allow transit-oriented developments on lands along transit routes and require major developments to provide either a transit stop on site or connection to a transit stop when the transit operator requires such an improvement. The rule [OAR 660-012-0045(3)] also requires local governments to adopt land use regulations that provide for safe and convenient pedestrian and bicycle access within new developments and from these developments to adjacent residential areas and transit stops and to neighborhood activity centers.”

The acknowledged TSP establishes Springfield’s local transportation system plan consistent with the policy direction of Policy 1B of the OHP to coordinate land use and transportation decisions to efficiently use public infrastructure investments to:

- *Maintain the mobility and safety of the highway system;*
- *Foster compact development patterns in communities;*
- *Encourage the availability and use of transportation alternatives; and*
- *Enhance livability and economic competitiveness.*

2030 Plan supports implementation of TransPlan/Metro Plan Transportation Element/TSP strategies to reduce reliance on single occupancy vehicles. Springfield previously designated and zoned lands to support implementation of the regional principles, goals, policies and strategies of the adopted Metro Plan Transportation Element intended to support achievement of compact urban growth, increase residential densities, and encourage mixed-use developments in designated areas. Springfield previously designated lands “Nodal Development;” established Mixed-Use zoning districts and a Nodal

Overlay District in the Springfield Development Code; applied Mixed-use zoning and a Nodal Development Overlay District; and designated one of the first Multi-modal Mixed Use Areas (MMA) ⁵⁴ Areas in the state (Glenwood).

The subject Springfield 2030 Comprehensive Plan policies (and the previously acknowledged 2030 Residential Land Use and Housing Element policies and implementation measures) support implementation of nodal development as one land use strategy intended to increase use of alternative modes of transportation and increased opportunities for people to live near their jobs and to make shorter trips for a variety of purposes. The CIBL/EOA allocates employment growth to nodal areas as shown in the applicable adopted Springfield refinement plans and master plans. The City's subject 2030 Plan amendments implement existing acknowledged comprehensive plan designations and zoning map designations interpreting and implementing those designations that were in place when the Springfield Transportation System Plan was adopted. The 2030 Plan Economic Element and Urbanization Element policies in Ordinance Exhibits B and C provide clear city-specific land use policy direction coordinated with Springfield TSP policies, projects and programs to support implementation of land use and transportation planning measures that are intended to:

- Maintain the mobility and safety of the highway system;
- Continue to foster compact development patterns in Springfield;
- Continue to encourage the availability and use of transportation alternatives by allocating 2030 employment growth to areas with existing or planned public transit service; and
- Enhance Springfield's livability and economic competitiveness.

The Metro Plan Transportation Element noted the challenge of changing long-established land use patterns to encourage availability and use of transportation alternatives”:

“The Market Demand Study for Nodal Development (ECONorthwest and Leland Consulting Group, 1996) recommended that the public strategy for nodal development should be flexible and opportunistic and include use of financial incentives, targeted infrastructure investments, public-private partnerships, and an inviting administrative atmosphere.” ⁵⁵

*“During the public review of the nodal development strategy, many comments were received that identified the need for incentives for developers, builders, property owners, and neighborhoods to ensure that nodal developments would be built consistent with design guidelines. The type of support and incentives suggested ranged from public investments in infrastructure to technical assistance and economic incentives.”*⁵⁶

⁵⁴ As defined in OAR 660-012-0060(10)(B)(b)(A),(B), (C),(D) and (E).

⁵⁵ Metro Plan p.III-F-4

⁵⁶ Ibid.

As described in the City's findings under Goal 9, the 2030 Plan Economic Element policies identify Springfield's public strategy for supporting redevelopment of higher density, transit-oriented mixed-use development as a key element in the city's overall economic development strategy. Springfield provides information, technical assistance, financing incentives and infrastructure support for nodal development primarily through the Springfield Economic Development Agency's (SEDA) administration of the Glenwood and Downtown urban renewal districts. [Metro Plan Transportation Element Policy F.2, F.3]

As described in the TSP, Springfield coordinates with the MPO and partners with Lane Transit District and Springfield School District 19 to implement demand management programs (Point-to Point Solutions, Smart Trips Program, Safe Route to Schools).

Downtown Parking Management Plan to support Downtown redevelopment. Springfield's Downtown District is exempt from parking requirements. The Downtown Parking Management Plan⁵⁷ was adopted in 2010. Section VII of the Plan presents Springfield's strategies for regulating parking efficiently to support safe and positive customer experience to support Downtown commerce and to help Springfield attract a more diverse mix of retail, office and residential uses. The City is currently implementing the strategies and is considering parking management program options to incentivize redevelopment in Glenwood.

2030 Plan policies support compact urban design to reduce traffic impact on state highways. The Oregon Highway Plan recognizes that access management strategies can be implemented to reduce trips and impacts to major transportation facilities, such as freeway interchanges, and that communities with compact urban designs that incorporate a transportation network of arterials and collectors will reduce traffic impacts on state highways, postponing the need for investments in capacity-increasing projects.

The 2030 Plan policies support employment growth in centers and corridors accessible by transit, walking and bicycling. Metro Plan Transportation Element p. III-F-9 states:

"Transit services are particularly important to the transportation disadvantaged population: persons who are limited in meeting their travel needs because of age, income, location, physical or mental disability, or other reasons. The Americans with Disabilities Act (ADA) requires fixed-route systems like Lane Transit District's (LTD) to provide a comparable level of service to the elderly and persons with disabilities who are unable to successfully use the local bus service. LTD's Americans with Disabilities Act Paratransit Plan, 1994-1995 Update (January 18, 1995) was found to be in full compliance with the ADA by the Federal Transit Administration."

Metro Plan Transportation Element Policy F.18 states:

⁵⁷ Springfield Downtown Urban Design Plan – Parking Management, Rick Williams consulting, July 2010.

“Improve transit service and facilities to increase the system’s accessibility, attractiveness, and convenience for all users, including the transportation disadvantaged population.”

Metro Plan Transportation Element Policy F.19 states:

“Establish a BRT system composed of frequent, fast transit service along major corridors and neighborhood feeder service that connects with the corridor service and with activity centers, if the system is shown to increase transit mode split along BRT corridors, if local governments demonstrate support, and if financing for the system is feasible.”

Metro Plan Transportation Element Policy F.20 states:

“Implement traffic management strategies and other actions, where appropriate and practical, that give priority to transit and other high occupancy vehicles.”

Metro Plan Transportation Element Policy F.22 states:

“Construct and improve the region’s bikeway system and provide bicycle system support facilities for both new development and redevelopment/expansion.”

Metro Plan Transportation Element Policy F.23 states:

“Require bikeways along new and reconstructed arterial and major collector streets.”

Metro Plan Transportation Element Policy F.24 states:

“Require bikeways to connect new development with nearby neighborhood activity centers and major destinations.”

Metro Plan Transportation Element Policy F.26 states:

“Provide for a pedestrian environment that is well integrated with adjacent land uses and is designed to enhance the safety, comfort, and convenience of walking.”

Metro Plan Transportation Element Policy F.27 states:

“Provide for a continuous pedestrian network with reasonably direct travel routes between destination points.”

Metro Plan Transportation Element Policy F.28 states:

“Construct sidewalks along urban area arterial and collector roadways, except freeways.”

Goal 12 Conclusion. Based on the findings and conclusions stated, the City’s 2030 Plan amendments are consistent with Goal 12, and the relevant policies of the Metro Plan.

Statewide Planning Goal 13: Energy Conservation

OAR 660-015-0000(13)

To conserve energy.

“Land and uses developed on the land shall be managed and controlled so as to maximize the conservation of all forms of energy, based upon sound economic principles.”

Metro Plan IIIJ Energy Element addresses Goal 13. The 2030 Plan amendments so not affect compliance with Goal 13 or Metro Plan IIIJ Energy Element. 2030 Plan policies support and encourage use of energy efficient buildings, energy efficient transportation systems and modes, recycling and re-use of previously land and buildings, and increasing employment capacity in higher density mixed-use multi-modal centers and corridors.

The Goal 14 boundary alternatives analysis requires cities to consider and balance energy consequences as one of the four Goal 14 ESEE locational factors in comparing different sites for potential urbanization.

To implement Goal 13, the Springfield Development Code addresses lot size, dimension, and siting controls; building height and bulk; density of uses; availability of light, wind and air; compatibility of and competition between competing land use activities; and provisions for collection of waste.

Goal 13 conclusion. The 2030 Plan amendments are consistent with Goal 13, as implemented through the policies in Metro Plan IIIJ Energy Element and the 2030 Plan policies.

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August 22, 2016

Springfield City Council and Lane County Board of Commissioners
c/o Lane County Land Management Division
3050 North Delta Hwy
Eugene, OR 97408

Re: Springfield Urban Growth Boundary, Comprehensive Plan and Zoning Changes, & Lane County Rural Comprehensive Plan Updates

Dear City Councilors and County Commissioners:

We submit this letter and attached exhibits on behalf of Johnson Crushers International (JCI) for submission into the record for the Springfield 2030 Refinement Plan Update and Proposed Expansion of the Urban Growth Boundary (UGB) proceedings. JCI, with the support of other landowners in the Seavey Loop area, have participated in the UGB expansion proceedings for several years. Unfortunately, it troubles us to have to repeat much of what we told the joint decision-making bodies back in 2014 – the proposal before you and the findings in support of that proposal are flawed. You should not approve the proposed ordinances and, instead, should instruct the planning staff to make a decision that is consistent with the priority scheme set forth in ORS 197.298 as it has been interpreted and applied by LCDC, the Court of Appeals and, most recently, LUBA.

While we fundamentally agree with the analysis to-date concerning the amount of employment land the City of Springfield will need in the coming years, as well as the appropriateness of looking at promoting "Traded Sector" employment opportunities, we disagree with the current UGB expansion proposal before you, which does not include the Seavey Loop area in the lands proposed to be included in the UGB for employment purposes.

We again encourage the Springfield City Council and Lane County Board to revisit the state statute and the Statewide Planning Goal 14 that will be the touchstones for review of any decision to expand the City of Springfield's UGB. Now is the time for you to examine, on your own, the requirements of ORS 197.298 and to evaluate the proposal before you through that lens. We are confident that following such consideration, you will recognize the necessity of including the Seavey Loop area as one of the areas for inclusion into the City of Springfield's UGB.

The evidence in the record supports inclusion of the Seavey Loop area.

Upon review of the joint hearing materials, we were at first shocked that the Seavey Loop area was not included as part of the UGB employment lands expansion proposal and then appalled at

the analysis included in the findings that resulted in that conclusion. Simply put, the findings do not comport with the evidence in the record and the recommended decision is contrary to the priority scheme set forth under ORS 197.298.

The evidence in the record supports a conclusion that the Seavey Loop Area can and will help the City of Springfield satisfy a significant portion of its demonstrated employment land needs consistent with the statutory priority scheme. Conclusions otherwise are contrary to the evidence in the record.

ORS 197.298 sets out both the priority scheme and the permitted exceptions for including lands within an urban growth boundary.¹ While appellate interpretations of the meaning and application of ORS 197.298 will be addressed under separate heading below, as will specific errors regarding the Seavey Loop area analysis in the proposed findings, suffice it to say that the priority scheme set forth under ORS 197.298 is strictly applied on appellate review.

¹ ORS 197.298 **Priority of land to be included within urban growth boundary** provides:

"(1) In addition to any requirements established by rule addressing urbanization, land may not be included within an urban growth boundary except under the following priorities:

"(a) First priority is land that is designated urban reserve land under ORS 195.145, rule or metropolitan service district action plan.

"(b) If land under paragraph (a) of this subsection is inadequate to accommodate the amount of land needed, second priority is land adjacent to an urban growth boundary that is identified in an acknowledged comprehensive plan as an exception area or nonresource land. Second priority may include resource land that is completely surrounded by exception areas unless such resource land is high-value farmland as described in ORS 215.710.

"(c) If land under paragraphs (a) and (b) of this subsection is inadequate to accommodate the amount of land needed, third priority is land designated as marginal land pursuant to ORS 197.247 (1991 Edition).

"(d) If land under paragraphs (a) to (c) of this subsection is inadequate to accommodate the amount of land needed, fourth priority is land designated in an acknowledged comprehensive plan for agriculture or forestry, or both.

"(2) Higher priority shall be given to land of lower capability as measured by the capability classification system or by cubic foot site class, whichever is appropriate for the current use.

"(3) Land of lower priority under subsection (1) of this section may be included in an urban growth boundary if land of higher priority is found to be inadequate to accommodate the amount of land estimated in subsection (1) of this section for one or more of the following reasons:

"(a) Specific types of identified land needs cannot be reasonably accommodated on higher priority lands;

"(b) Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or

"(c) Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands."

Because the City of Springfield has no urban reserves, exception areas constitute the land of highest priority for inclusion into the city's UGB. ORS 197.298(1)(b). As we explained in our February 2014 letter to the joint decision-makers:

"Of the areas under consideration for UGB expansion, the Seavey Loop area is the only area that already includes exception land planned for employment uses, and it is the area that has the highest concentration of exception lands of all types." Letter, February 2014, page 3.

Attached as Exhibit 1 is a map showing the Seavey Loop area (also called College View during some planning stages) that shows the Seavey Loop area under consideration throughout the land use proceedings. It appears from the graphics in the proposed findings that the present Seavey Loop area may include a slightly different configuration of parcels, to include the entirety of the JCI parcel to the east of S. Franklin Boulevard; but overall the Seavey Loop area considered for inclusion into Springfield's UGB to meet the city's employment land needs is very similar to that shown on Exhibit 1.

Compare that area to Exhibit 2, which shows the county zoning and plan designations for the Seavey Loop area. The vast majority of those parcels are exception lands, which are the highest priority lands for inclusion under ORS 197.298(1). Some of the land is EFU land, but as will be discussed momentarily, that land too is of higher priority than the EFU lands for areas the proposal recommends for inclusion into the UGB.

The above points are reinforced by the attached Exhibit 3, which shows all of the exception areas around the City of Springfield. Note that the exception areas within Area 9, Seavey Loop, are more extensive and more diverse than other exception areas. Further note that the two areas recommended by staff for inclusion into the UGB, the North Gateway area and the Mill Race area, contain no exception lands.

Because the Springfield area has no significant marginal lands that can meet employment land needs, the next consideration under the priority scheme is to include resource land, either agricultural, forestry or both. ORS 197.298(1)(d). However, ORS 197.298(2) explicitly provides that higher priority is to be given to land with lower soil capabilities as measured by either the capability classification system (for agricultural lands) or by cubic foot site class (for forestry lands).

Again, the evidence in the record demonstrates that the resource lands within the Seavey Loop area contains lands of lower soil capabilities than do those of the Mill Race area and the northern portion of the North Gateway area. This is plainly demonstrated in the attached Exhibit 4, which shows soils classifications by shades of brown. The darker the color, the better the soil and the lower priority. Exhibit 4 is annotated with yellow clouds around three key areas. It is plainly evident that the Seavey Loop area includes light to medium shades of brown compared to the medium to dark shades of brown for the areas staff recommend for inclusion into the UGB. That

means the agricultural lands for Seavey Loop have a higher priority for inclusion in the UGB expansion than the other two areas. No amount of finagled finding is going to persuade an appellate review body to disregard what their eyes plainly show them from the Soil Capability and Constraints map.

Last, and perhaps most significant, is Exhibit 5, the July 2014 UGB Expansion Area map for Seavey Loop/College View. That map shows, even with the BPA easement and steep-slope areas excluded, multiple vacant or near vacant parcels of between 4 and 14 acres, as well as at least one parcel over 30 acres in size. Note that the findings include the entirety of TL 306, the JCI parcel to the east of S. Franklin Boulevard, as being 20 acres, whereas Exhibit 5 only includes an 8.8-acre portion of that parcel. With the full JCI parcel, that would make two individual parcels of at least 20 acres in size available in Seavey Loop. Each of the above parcels, either individually or collectively for adjacent vacant parcels, can help the City meet its employment land needs and reduce the pressure to bring farmland with even higher value soils into the UGB.

The City's employment land needs have been identified as the need for 4 parcels between 4 and 20 acres totaling 37 acres, and three parcels greater than 20 acres totaling 186 acres. See Staff Report, p. 102. The evidence in the record demonstrates that the available land within the Seavey Loop area can easily help the city meet a substantial portion of its medium parcel size needs and one to two of its large parcel needs.

Findings cannot be used to explain those facts away. And given that the Seavey Loop area consists of exception land and lower soils quality/higher priority lands than the other areas recommended for inclusion into the UGB, the City and County must first include Seavey Loop before it can look to those other areas to help meet the City's demonstrated employment land needs. That is what the statutory priority scheme set forth in ORS 197.298(1) requires.

While the Seavey Loop area cannot meet the entirety of the City's demonstrated employment land needs, the City cannot leap frog over Seavey Loop simply because it alone cannot meet all of the city's needs. ORS 197.298 prohibits the City and the County from doing that.

Recent case law has only reinforced the focus on the statutory priority scheme for UGB expansion decision making.

Our February 2014 letter to the joint bodies discussed at length the legal framework for UGB expansions as well as relevant interpretations of those requirements conducted by LCDC and the Oregon Court of Appeals. They included an LCDC order to the City of Bend and Deschutes County, and the Court of Appeals decisions in *1000 Friends of Oregon v. LCDC (McMinnville)*, 244 Or App 239, 259 P3d 1021 (2011), and *1000 Friends of Oregon v. LCDC (Woodburn II)*, 260 Or App 444, 317 P3d 927 (2014). None turned out well for the local jurisdictions.

Recently, LUBA revisited the framework the Court of Appeals presented in the *McMinnville* case when ruling on Coburg's efforts to expand its urban growth boundary. See attached Exhibit

6, *Land Watch of Lane County v. Lane County*, __ Or LUBA __ (Luba Nos. 2016-003/004, August 1, 2016). While this UGB decision will be reviewed by LCDC instead of LUBA, it is worth noting that the Board's interpretation and application of ORS 197.298 is just as demanding as LCDC's and the Court of Appeals'.

LUBA's explanation of the UGB expansion process and the court's interpretation of it in *McMinnville* covers 6 pages. See, Exhibit 6, Slip Op at 17-23. However, the Board begins its explanation with the following summary:

"ORS 197.175(1) requires cities and counties to exercise their planning and zoning responsibilities in accordance with state land use statutes and the Statewide Planning Goals. ORS 197.298 requires that urbanization of rural lands occur by expanding the UGB based on a priority scheme. Although the statute partially supplants the requirements of Goal 14, the Goal continues to operate in a manner that supplements the statutory priority scheme." Exhibit 6, Slip Op at 17 (footnote omitted).

In remanding under the second assignment of error, LUBA rejected thirteen different reasons under Goal 14, its administrative rules, and ORS 197.298(3) the City of Coburg gave for deviating from the ORS 197.298(1) statutory priority scheme.

Because LUBA directly and succinctly addressed just how difficult it is for a local government to justify deviating from the statutory priority scheme in its conclusion for the second assignment of error, it is worth quoting from that decision here. LUBA explained:

"To the extent our discussion above has not made this point clearly enough, respondents appear to view Goal 14, Boundary Location Factor 3 "[c]omparative environmental, energy, economic and social consequences" and Goal 14 Boundary Location Factor 4 "[c]ompatibility of the proposed urban uses with nearby agricultural and forest activities occurring on farm and forest lands outside the UGB" and ORS 197.298(3) as a [*sic.*] more available vehicles for not following the ORS 197.298(1) priorities for including better agricultural lands than is actually the case. In applying the Goal 14 Boundary Location Factors, respondents must do more than identify possible environmental, energy, economic or social consequences, and possibly incompatibilities with agricultural activities if exception lands or poorer quality agricultural soils are included according to the ORS 197.298(1) priorities. *Respondents must establish that such considerations justify deviating from the statutory priorities, notwithstanding the legislature's expressed preference for those priorities. Respondents should not underestimate the difficulty of making such a demonstration. A similar caution is appropriate for attempts to use ORS 197.298(3) to avoid the ORS 197.298(1) priority scheme.*" Exhibit 6, *Land Watch of Lane County v. Lane County*, Slip-Op at 46-47 (*emphasis supplied*).

All three appellate bodies have basically said that overcoming the ORS 197.298(1) priority scheme is much more than simply jumping a hurdle, it means successfully completing a pole-vault. The proposed decision and findings before you fail to even come close to that bar.

As the City Council and County Board consider the proposal before it, you must be cognizant of the priority requirements spelled out under ORS 197.298 and Goal 14, as interpreted by these appellate bodies, as well as the need to fully justify your rationale if you wish to make a decision that will pass muster in Salem. The priority scheme does not readily allow local governments to skip higher priority lands to include lower priority lands instead. Consequently, if any area is brought into the City of Springfield to meet the identified employment land need, it must include land in the Seavey Loop area before turning to other areas to bring in the remaining amount of land needed.

The proposed findings contain fatal flaws in its analysis of the Seavey Loop Area.

The proposed findings make numerous factual, legal and analytic errors, several of which are discussed below. The City Council and Board of Commissioners should reject the proposed findings and request that staff present a decision and findings that can withstand review by LCDC.

The findings substantially misrepresent the footprint of the Seavey Loop area under consideration.

Attached Exhibits 1 and 5 show the footprint of the Seavey Loop area under consideration to accommodate the City of Springfield's employment land needs with only minor potential variation. At least twice the findings make statements that are correct only if the "Seavey Loop area" is an area substantially greater than what has actually been proposed for inclusion into the UGB.

At page 336 the findings state that "the largest blocks of predominantly Class I and II soils outside of the Springfield UGB are located * * * south of the Willamette River, south of the Springfield UGB and east of Interstate Highway 5 (Seavey Loop area)." As one can readily see from attached Exhibit 4 (Soils Map) there are **no** blocks of predominantly Class I and II soils in the Seavey Loop area actually considered.

The error at page 336 is perhaps clarified by the error at page 342, which states that the largest contiguous areas of Class I and Class II high value farmland soils include "Seavey Loop area east of Mt. Pisgah and along Highway 58."

From that statement everything is plainly evident – both Class I and II soils references are to areas east of the Seavey Loop area that is actually considered for inclusion into the UGB. To be clear, never in the several years of this ongoing land use process has the City of Springfield or any party involved ever requested or even considered that the land in the floodway immediately

east of the Seavey Loop area shown at Exhibits 1 and 5, or the agricultural lands even further east that approach Mt. Pisgah were part of the "Seavey Loop area" proposed for UGB expansion.

Any findings or analysis that considers those areas as being part of the Seavey Loop area is flat out wrong, as are other factual errors contained in the findings.

The findings so focus on the trees that it misses the forest, perhaps intentionally so.

One cannot accuse the findings of brevity, not at 517 pages. But while the statute and goal require a degree of attention to detail, it does not permit losing the big picture. Compliance with ORS 197.298(1) is not determined by the number of words contained in a set of findings. Furthermore, the statute – goal interaction in the UGB expansion process, while somewhat complex, is much simpler than that employed by the proposed findings as the Court of Appeals explained in *McMinnville*, and LUBA summarized in the recent Coburg decision.

The degree of detail engaged by the findings here raises serious questions as to whether such efforts are an intentional effort to craft the analysis to reach a desired outcome, not to follow the direction provided by the statute and goal to determine the lands they indicate should be brought into the UGB.

A couple of examples are worth noting. Why is it that, when examining the exception areas within Seavey Loop, the analysis breaks the area down into 6, if not 7 different smaller segments identified as Seavey Loop A through F and Seavey Loop/Goshen? Why are no other areas similarly broken down? Does that breaking the study area into smaller segments help or hurt the analysis?

The above begs the question why the analysis failed to recognize that there is one industrially zoned parcel and three adjacent rural residential parcels that are each greater than 6 acres in size and are minimally developed? Each is suitable for meeting the City's demonstrated employment land needs. The analysis concluded none of them were developable for that purpose.

Furthermore, those three rural residential parcels, totaling 21 acres are adjacent to JCI's property – either 8.8 or 20 acres in size depending upon whether one includes part of or the entirety of the property – represent a substantial opportunity of providing a 30-to-40-acre site to attract the types of traded sector employers the city seeks. Why does the analysis hide that condition instead of revealing it? Furthermore, one of the smaller parcels abuts the 31-acre Straub Family Revocable Trust property, which could lead to a 60-70-acre site for possible industrial development.

Instead of understanding the opportunity that the Seavey Loop area affords the City of Springfield to meet its demonstrated economic land needs, the analysis dissects the area so finely as to make the area unrecognizable as a whole. Reviewing bodies on appeal will not make the same mistake.

The findings misapply ORS 197.298(1)(d) and ORS 197.298(2).

This issue is discussed briefly above in the section on why the evidence supports inclusion of the Seavey Loop area, however additional analysis is warranted.

ORS 197.298(2) is explicit that a higher priority should be given to land of "lower capability as measured by the capability classification system." That system classifies soils as Class I through VIII, with Class I soils being of better quality (i.e. more productive) and Class VIII being of poor quality.

However, throughout much of the findings, the analysis uses descriptions such as "high value farmland" and "low value soils", which refer to groupings of soils classifications used for other statutory reasons. What the analysis does is it gives the appearance that different areas under consideration have similar soils when they in fact do not merely because the two areas consist of different soils type that are considered soils that support a high value farmland classification. But those soils are not the same, at least not for purposes of UGB expansion analysis. One look at the soils map included hereto as Exhibit 5 can show you that. Both Seavey Loop and the Mill Race area consist predominantly of high value farmland, Seavey Loop consists mostly of Class IV soils and is therefore lighter in color than the Mill Race area which consists predominantly of Class II soils. To the ORS 197.298 statutory priority scheme, this difference is significant and requires one area (Seavey Loop) to be brought into the UGB before the other area (Mill Race) if additional land is needed to meet the City's employment land needs after examination of higher priority lands. The findings do not make this distinction clear.

The proposed findings misapply ORS 197.298(2) and ORS 197.298(1)(d) in failing to prioritize the available agricultural land at Seavey Loop above lower priority lands in the Mill Race area and the North Gateway area.

The findings misapply the ORS 197.298(3) exceptions to the statutory priority scheme.

As LUBA made clear in its decision for the City of Coburg, the exceptions to the statutory priority scheme provided under ORS 197.298(3) are precisely defined and are difficult to meet. The findings misapply at least two of these exceptions – subsections (a) and (b).

ORS 197.298(3)(a) permit an exception to the statutory priority scheme for instances when "specific types of identified land needs cannot be reasonably accommodated on higher priority lands." The findings seek to invoke various provisions of OAR 660 division 09 and division 24, pertaining to economic development and urban growth boundaries, to define what is meant by "reasonably accommodated." See Findings, p. 206 *et. seq.* However, the findings attempt to use those regulations to lower the statutory bar to make it easier to deviate from the priority scheme. Appellate bodies time and time again have concluded that such approaches constitute error.

As LCDC told the City of Bend and Deschutes County, the bar for bypassing higher priority lands altogether in favor of lower priority lands is extremely high. So, for example, as LUBA

explained in its recent decision, the parcelization of land is no excuse to conclude that certain land types cannot be reasonably accommodated on higher priority lands because, by their very nature, exception lands will always be more parcelized than non-exception land. The findings' efforts to use administrative rules to lower the standard for when the "cannot be reasonably accommodated" exception is met constitutes error that LCDC will not overlook.

Similarly, the findings' application of ORS 197.298(3)(b) and its exception to deviate from the priority scheme because "future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints" provided express circumstances for when that exception is available. Those circumstances are not met for the Seavey Loop area. While the findings expressly state that "cost of service was not estimated or evaluated at this time" (Findings p. 236) and the analysis tables includes statements such as, "Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of [services]" (See Findings p. 251) those statements only pay lip service to the requirements of the exception, at least in the instance of Seavey Loop.

The findings use the right words, but when one reviews the analysis itself, one sees that water is already provided to the area, wastewater requires only the addition of a couple of pump stations along with line extensions (not an unreasonable engineering effort), storm water services can be "made with little or no impact on existing storm water systems" requiring only the coordination with several other regulatory agencies; and that traffic services are feasible despite expected challenges at certain locations. See, *e.g.*, Findings, pages 248-51, (Public Facilities and Services Analysis for Seavey Loop Exception B, C and E). Each is simply a cost or coordination factor. Likewise, distance of the length involved for Seavey Loop is not a physical constraint, it simply increases the cost of the utility improvements, something appellate bodies have concluded is not a permissible consideration. There are no "topographic" constraints described in the analysis despite the statement that there are.

Such faulty analysis is erroneously applied repeatedly to the Seavey Loop area throughout the findings and the application of the ORS 197.298(3) exception criteria. Reviewing bodies will not permit the weakening of the exception criteria as the findings attempt and the reviewing bodies will remand a decision that adopts the proposed findings.

The above are but a few of the analytical, legal and factual flaws contained in the proposed findings. The City Council and the County Board of Commissioners should reject the analysis now and instruct staff to revisit the findings and to apply the priority scheme and exceptions in the manner set forth in their plain language and as applied upon appellate review.

Conclusion

We urge the joint decision-making bodies to reject the proposal before you and to direct the planning staff to develop a proposal and draft supporting findings that are consistent with ORS 197.298 and Goal 14. LCDC, the Court of Appeals, and now LUBA have plainly stated that the

Springfield City County and Lane County Board of Commissioners

August 22, 2016

Page 10

legislature meant what it said in establishing the statutory priority scheme and that any UGB expansion decision that is not consistent with that statute will be remanded back to the local governments.

We believe that there can be no defensible decision to expand the City of Springfield's urban growth boundary for employment land purposes that does not include the Seavey Loop area as part of the proposal. It is in everyone's best interest to get this right the first time around.

Thank you for your consideration.

Sincerely,

Bill Kloos

Bill Kloos

Cc: Jeff Schwartz, Johnson Crushers International
Mary Bridget Smith, Springfield City Attorney
Andy Clark, Lane County Legal Counsel

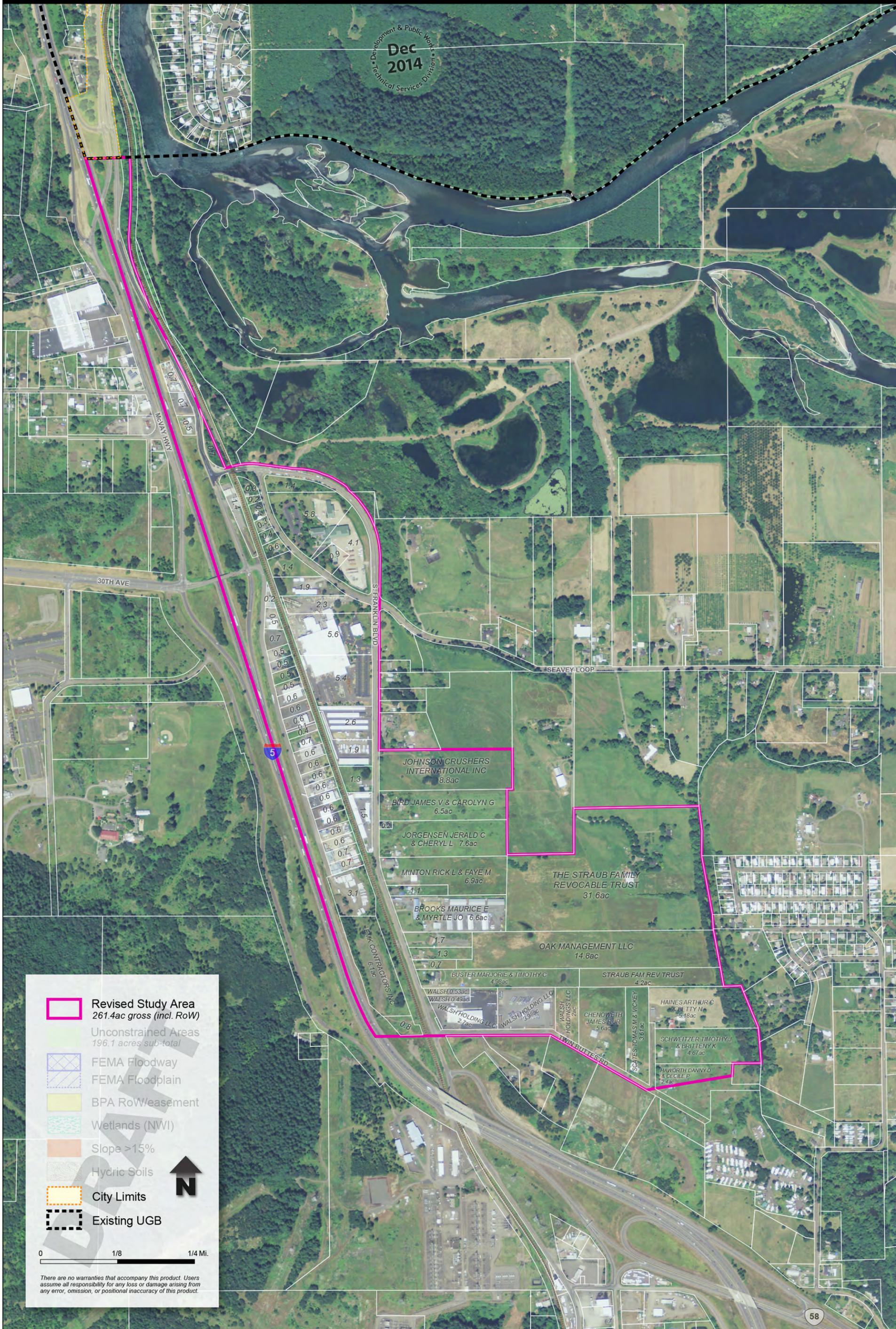
Exhibits included:

- Exhibit 1 College View Proposed UGB Expansion Area Map, December 2014
- Exhibit 2 Seavey Loop Area Plan and Zone Designation Map Excerpts
- Exhibit 3 Map 6: Priority 1 Lands for UGB Expansion, ECO Northwest, June 2009
- Exhibit 4 Soil Capability and Constraints Map (Annotated), March 2016
- Exhibit 5 Proposed UGB Expansion Areas – College View Industrial, July 2014
- Exhibit 6 *Land Watch of Lane County v. Lane County*, __ Or LUBA __ (Luba Nos. 2016-003/004, August 1, 2016)

SPRINGFIELD 2030 REFINEMENT PLAN: Proposed UGB Expansion Areas - College View Industrial



Development & Public Works
 Dec 2014
 Technical Services Division



Revised Study Area
 261.4ac gross (incl. RoW)

Unconstrained Areas
 196.1 acres sub-total

FEMA Floodway
 FEMA Floodplain

BPA RoW/easement

Wetlands (NWI)

Slope >15%

Hydic Soils

City Limits

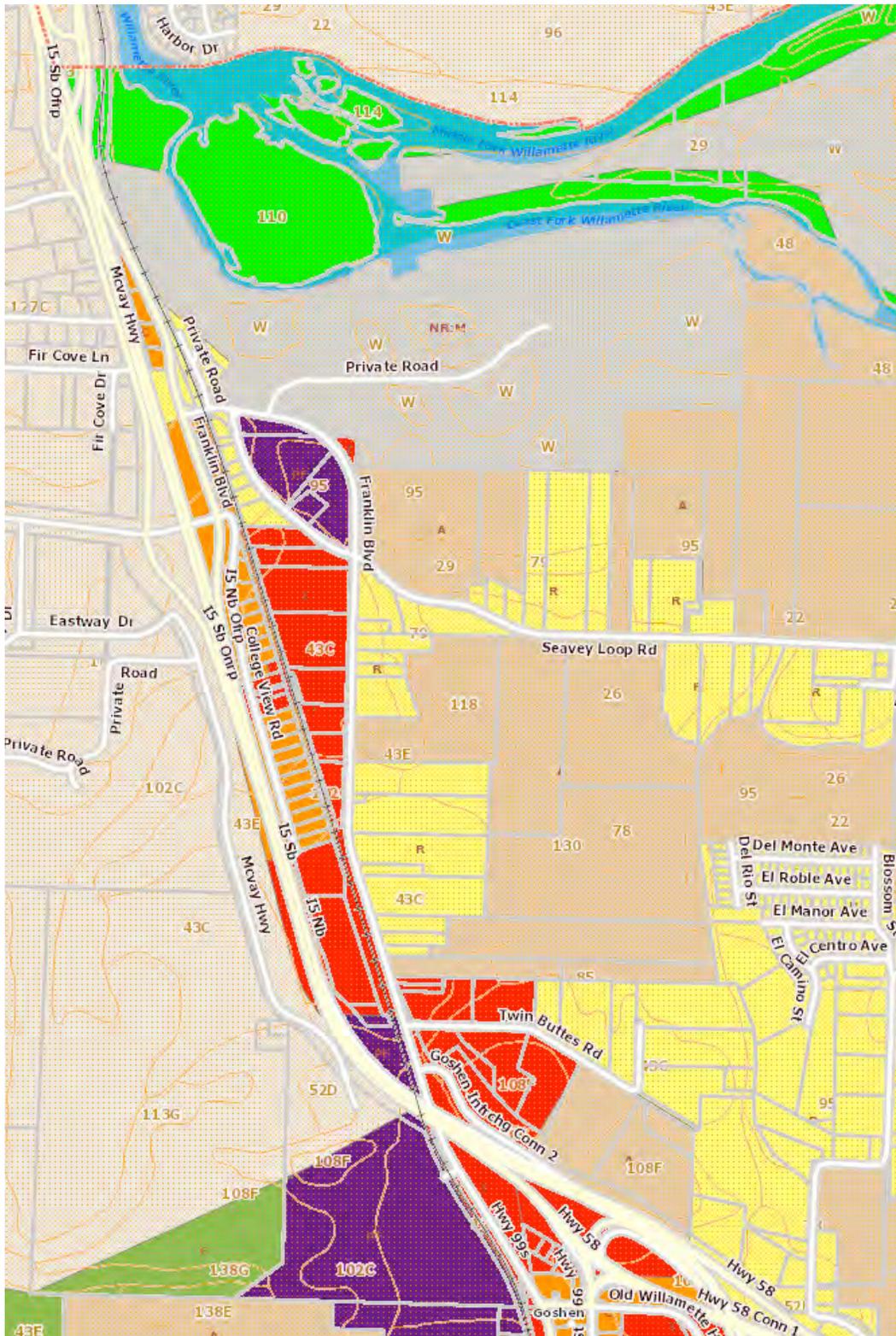
Existing UGB

0 1/8 1/4 Mi.

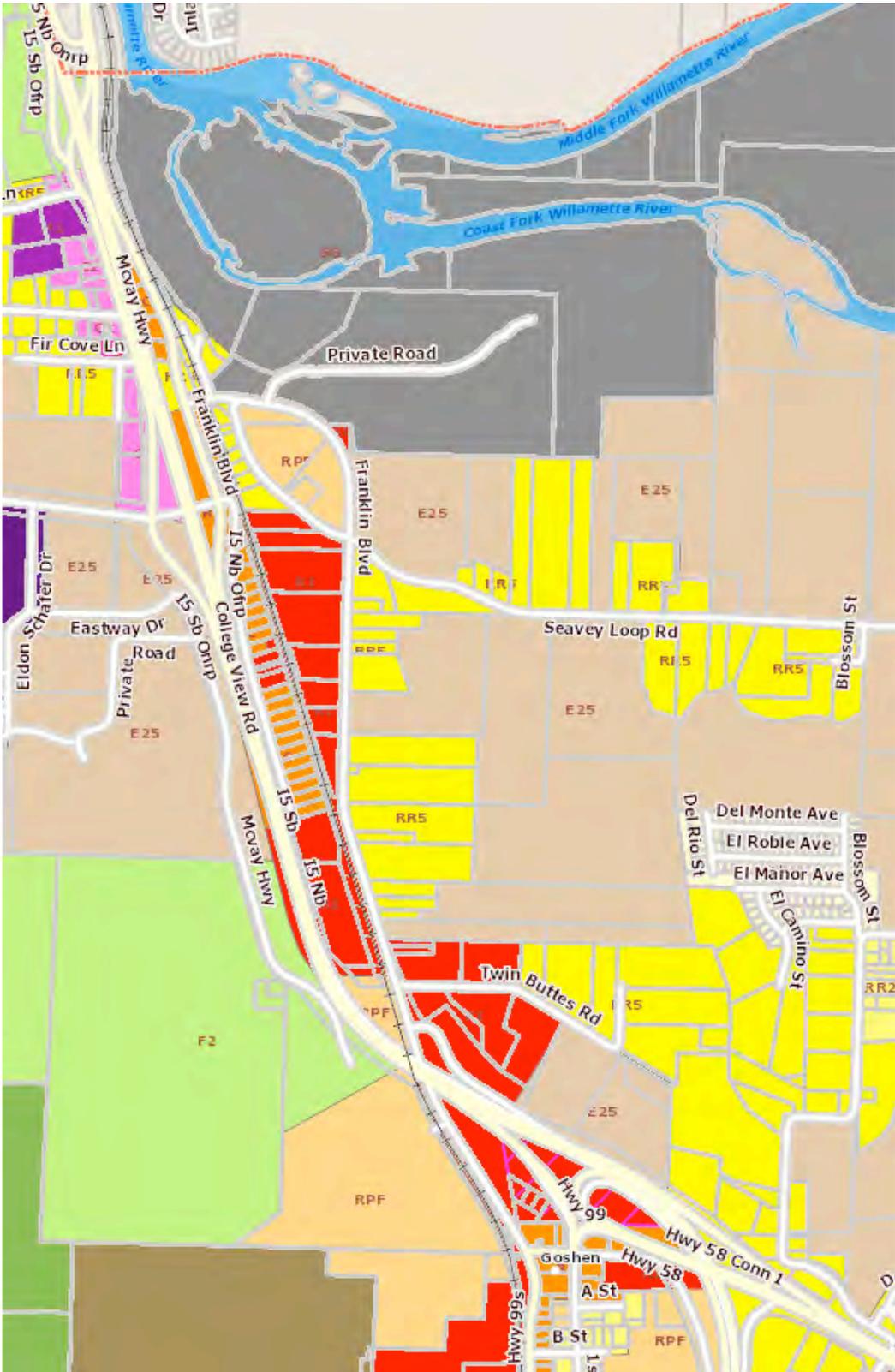
There are no warranties that accompany this product. Users assume all responsibility for any loss or damage arising from any error, omission, or positional inaccuracy of this product.

Seavey Loop Area Plan and Zone Designation Map Excerpts

County Plan Designations and Soils Information



County Zone Designations

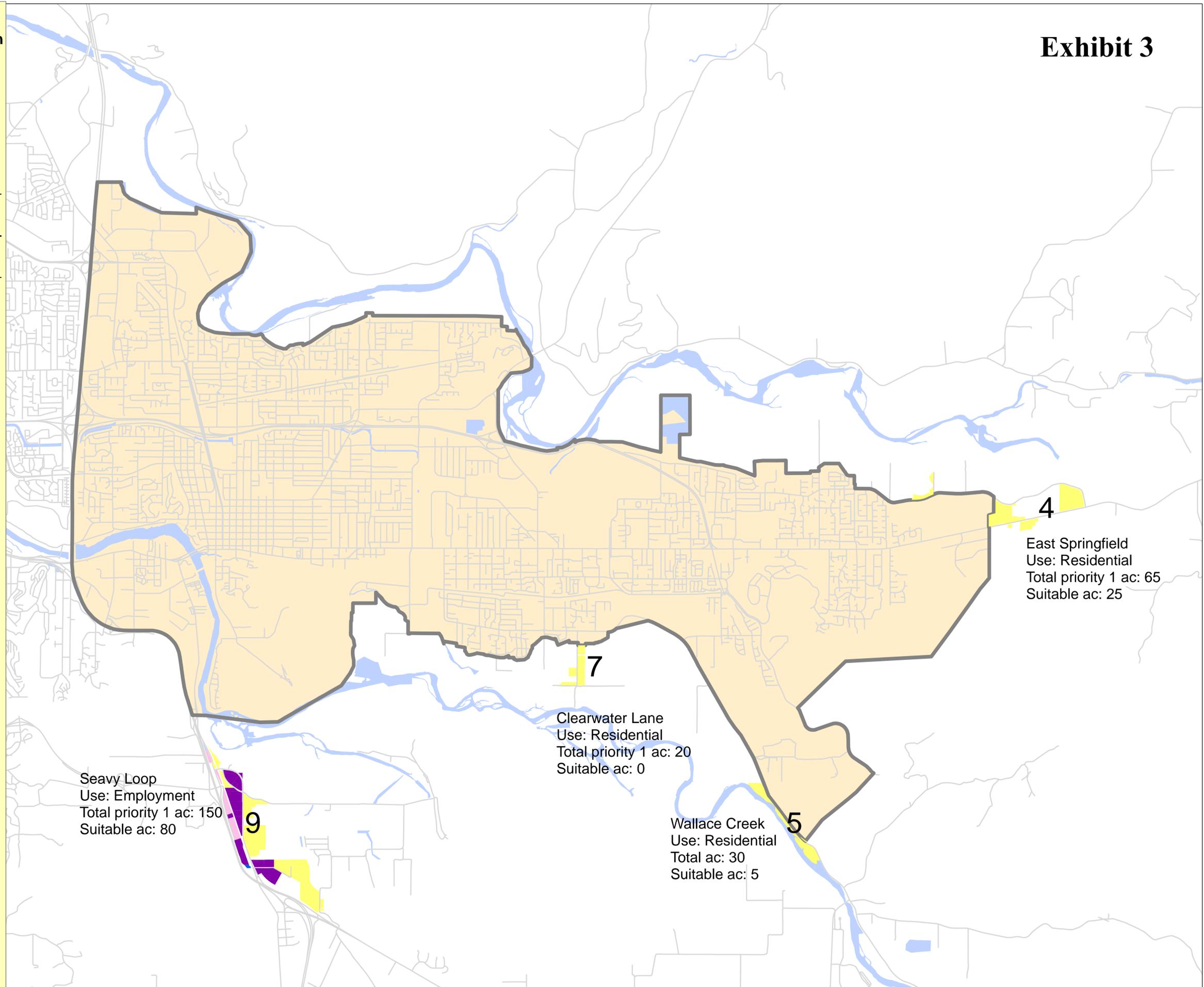


**Map 6. Priority 1 Lands for UGB Expansion
City of Springfield, Oregon**

Zoning

- Rural Residential
- Rural Commercial
- Rural Industrial
- Rural Public Facility

Zoning					
Area	Rural Residential	Rural Commercial	Rural Industrial	Rural Public Facility	Total
4. East Springfield	65	0	0	0	65
5. Wallace Creek	30	0	0	0	30
7. Clearwater Lane	20	0	0	0	20
9. Seavey Loop	94	15	40	1	150



4
East Springfield
Use: Residential
Total priority 1 ac: 65
Suitable ac: 25

7
Clearwater Lane
Use: Residential
Total priority 1 ac: 20
Suitable ac: 0

5
Wallace Creek
Use: Residential
Total ac: 30
Suitable ac: 5

9
Seavey Loop
Use: Employment
Total priority 1 ac: 150
Suitable ac: 80

Note: This is an urban growth boundary (UGB) expansion concept map. The boundary locations and acreages are approximate. The maps are subject to change. The inclusion of any properties in study areas shown on this map does not imply a future policy choice by the City of Springfield to include that land in the UGB.





SPRINGFIELD 2030 REFINEMENT PLAN: Proposed UGB Expansion Areas - College View Industrial



July 2014
Development & Public Works
Technical Services Division

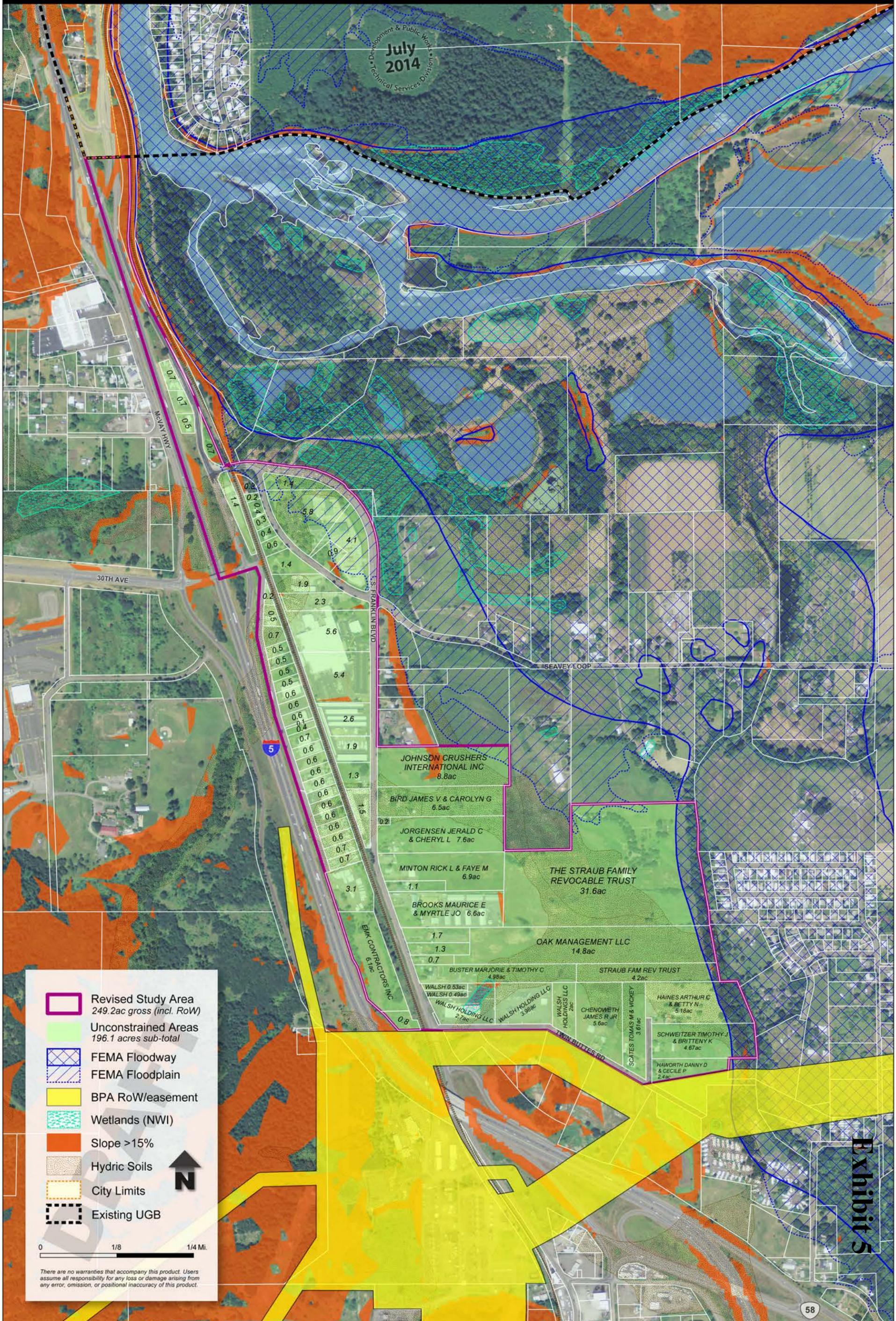


Exhibit 5

1 BEFORE THE LAND USE BOARD OF APPEALS
2 OF THE STATE OF OREGON

3
4 LAND WATCH OF LANE COUNTY
5 and LEE D. KERSTEN,
6 *Petitioners,*

7
8 vs.

9
10 LANE COUNTY and CITY OF COBURG,
11 *Respondents.*

12
13 and

14
15 INTERSTATE PROPERTIES, INC.,
16 *Intervenor-Respondent.*

17
18 LUBA Nos. 2016-003/004

19
20 FINAL OPINION
21 AND ORDER

22
23 Appeal from Lane County and City of Coburg.

24
25 William K. Kabeiseman, Portland, filed the petition for review and
26 argued on behalf of petitioners. With him on the brief was Garvey Schubert
27 Barer.

28
29 H. Andrew Clark, County Counsel, Eugene, filed a joint response brief
30 and argued on behalf of respondent Lane County.

31
32 Milo R. Mecham, of Coburg.

33
34 Dan Terrell, Eugene, filed a response brief and argued on behalf of
35 intervenor-respondent. With him on the brief was the Law Office of Bill Kloos
36 PC.

37
38 HOLSTUN, Board Chair; BASSHAM, Board Member; RYAN, Board

1 Member, participated in the decision.

2

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REMANDED

08/01/2016

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You are entitled to judicial review of this Order. Judicial review is governed by the provisions of ORS 197.850.

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NATURE OF THE DECISION

Petitioners appeal two county ordinances that amend a county rural comprehensive plan and co-adopt city comprehensive plan amendments to the city’s transportation system plan and urban growth boundary.

MOTION TO FILE OVER-LENGTH BRIEF; MOTION TO STRIKE

Respondents Lane County and City of Coburg (county and city, collectively respondents) filed a motion for an over-length response brief. Petitioners Land Watch of Lane County and Lee Kersten (petitioners) filed a motion to strike and a response to the motion. Because we have two consolidated appeals, complex decisions and issues, and a large number of parties, we consider all the parties’ filings, and petitioners’ motion to strike the over-length response brief is denied.

FACTS

Respondents have an intergovernmental agreement regarding coordinated planning and urban services pursuant to ORS 190.003 *et seq.* To address projected population growth in the area, the county and city initiated an urban growth boundary (UGB) expansion by passing ordinances to amend the city’s UGB and revise the city’s transportation system plan (TSP) for the area, based in part on the expanded UGB. The county ordinances that are before us

1 in this appeal concur in and adopt the city's UGB expansion and TSP
2 amendments.¹

3 Respondents determined that Coburg needs an additional 903 residential
4 dwelling units, which justifies an expansion of the UGB by 148.8 acres to
5 accommodate residential and residentially related public facility needs. Record
6 298-299. The city and county also determined that an additional 91.7 acres
7 needed to be brought within the UGB for employment, including land to
8 accommodate large scale industrial sites. Record 306.

9 The city studied eleven different candidate areas to meet the identified
10 need. A map showing those eleven areas and the UGB as it existed prior to the
11 disputed amendments is included as Appendix 1 (Record 1492).² Areas 1, 6, 7,
12 and 8 are made up almost entirely of agricultural land zoned for exclusive farm
13 use (EFU), with Areas 1 and 6 having the best soil quality, Area 8 having lesser
14 soils quality and Area 7 having the worst soil quality of Areas 1, 6, 7 and 8.
15 Area 5 is almost entirely rural residential land, for which an exception to Goal
16 3 (Agricultural Lands) was approved in the past. The UGB amendment
17 ultimately expanded the boundary to include 105.72 acres of land for light
18 industrial use, 2 acres for high-density residential use, 15 acres for medium-

¹ While the appealed ordinances are county ordinances, the decisions are joint city and county decisions and we refer to respondents in the plural in this opinion.

² The dashed line on the map shows the UGB before it was amended by one of the ordinances that is before us in this appeal.

1 density residential use, and 131.84 acres for low-density residential use.
2 Respondents chose to include within the UGB portions of Areas 1, 2, 5, and 6
3 for new residential development and Area 8 for industrial development. A map
4 showing the expanded UGB, west of Interstate-5, is included as Appendix 2
5 (Record 1494).³ To assist in keeping up with the characteristics of the relevant
6 study areas, we include the chart on the following page that summarizes the
7 information in this paragraph.

8 The TSP amendment includes a “Proposed Future Collector” (east-west
9 bypass) to allow traffic to travel north of the existing principal throughway
10 (Coburg Road-Van Duyn Street-Willamette Street). Appendix 3 (Record 1517)
11 shows the proposed east-west bypass. That east-west bypass would travel
12 through Areas 5 and 6 and the Coburg North Industrial Area (Coburg NIA), to
13 connect with Coburg Industrial Way, a north-south collector. The east-west
14 bypass is the subject of petitioners’ first assignment of error.

15

³ Because the color map is displayed here in black and white, it does not display the new UGB very clearly. But with the context map in the lower left corner of Appendix 2 the portions of Areas 5, 6 and 1 that were included in the UGB can be identified. Those areas are the subject of the second assignment of error.

Area Summary

Area	Land Type	Action
1	Mostly High Value Farm Land with some Exception Land	Included Both Exception Land and High Value Farm Land, for Residential Land Need – Omitted most High Value Farm Land
5	Predominantly Exception Land	Included Mid Area 5, All High Value Farm Land, for Residential Land Land Need. North and South Area 5, mostly Exception Lands, were not Included
6	High Value Farm Land	Included the lower part of Area 6, all High Value Farm Land
7	Worst Quality Farm Land (East of I-5)	Not Included
8	Better Quality Farm Land (East of I-5)	Included for Employment Land

FIRST ASSIGNMENT OF ERROR

A. TSP Violates Goal 9

As already noted, the proposed east-west bypass would travel through Areas 5 and 6 and through the Coburg NIA to connect with Coburg Industrial Way, a north/south collector. Petitioners argue that the county erred in adopting a TSP that does not comply with the Statewide Planning Goal 9

1 (Economic Development) and is not supported by an adequate factual basis.⁴
2 Under this subassignment of error, petitioners advance two arguments. First,
3 citing *Opus Development Corp v. City of Eugene*, 28 Or LUBA 670, 691
4 (1995), petitioners contend that developing the east-west bypass will reduce the
5 amount of land now available for commercial and industrial uses in the Coburg
6 NIA, and the county’s decision fails to account for this loss or demonstrate that
7 there will remain a sufficient inventory of land for commercial and industrial
8 uses, as it is required to do under directive 3 of Goal 9.⁵ *Id.* Second,
9 petitioners assert that the TSP does not comply with directive 4 of Goal 9,
10 which requires that local governments “[l]imit uses on or near sites zoned for

⁴ Goal 2 requires that amendments to a comprehensive plan are supported by a factual basis demonstrating compliance with applicable statewide planning goals. Goal 2 Guideline C.1.

⁵ Goal 9 provides that “[c]omprehensive plans for urban areas shall:

- “1. Include an analysis of the community’s economic patterns, potentialities, strengths, and deficiencies as they relate to state and national trends;
- “2. Contain policies concerning the economic development opportunities in the community;
- “3. Provide for at least an adequate supply of sites of suitable sizes, types, locations, and service levels for a variety of industrial and commercial uses consistent with plan policies;
- “4. Limit uses on or near sites zoned for specific industrial and commercial uses to those which are compatible with proposed uses.”

1 specific industrial and commercial uses to those which are compatible with
2 proposed uses.” We turn to petitioners’ second argument first.

3 Petitioners argue that the proposed east-west bypass would cut directly
4 through the NIA and significantly interfere with the NIA’s ability to continue
5 to provide regional employment opportunities. Petitioners cite to the testimony
6 of Steve Lee to the board of commissioners, which alleged that the east-west
7 bypass would severely damage the ability of current NIA industrial users to
8 continue operations. Petitioners’ Appendix C 1-3. That testimony is further
9 supported by Kelly Sandow, a civil engineer who explained how the bypass
10 might damage industrial operations by rendering loading docks unusable and
11 impairing the use of a parking lot at two existing buildings. Record 851-856.
12 Petitioners note that the TSP findings do not address the east-west bypass
13 road’s impact on the NIA and the city’s Economic Opportunity Analysis did
14 not account for any loss of employment land capacity due to the east-west
15 bypass road’s impact. Petitioners assert that the city must explain how the NIA
16 will be able to retain existing jobs if it is disrupted by the new east-west
17 bypass.⁶

⁶ Pursuant to OAR 660-012-0025(1), the TSP “constitute[s] the land use decision regarding the need for transportation facilities, services and major improvements and their function, mode, and general location.”

1 Respondents offer a number of responses to petitioners’ arguments, but
2 cite only one relevant finding, which does not address the alleged impacts of
3 the proposed east-west bypass on the NIA.⁷

4 It is certainly possible that the east-west bypass envisioned by the TSP
5 amendment might negatively impact the loading docks and parking associated
6 with the two buildings the east-west bypass would pass between, if that
7 roadway is actually constructed in the location shown in the amended TSP.⁸
8 But the fourth paragraph of Goal 9 does not operate in the broad way that
9 petitioners argue. The “specific industrial and commercial uses” that the fourth
10 paragraph of Goal 9 refers to are limited to “specific commercial or industrial
11 uses with special site requirements.” *Opus Development*, 28 Or LUBA at 693.
12 We explained in *Opus Development*, 28 Or LUBA at 692, that OAR 660-009-

⁷ The TSP Amendment’s brief finding on Goal 9 provides:

“The Coburg TSP is consistent with this goal because it reinforces the City’s freight network with transportation projects that will provide access to freight facilities and employment sites. Adopting the TSP will ensure that transportation improvements will be available to support the planned uses in the City’s employment areas, consistent with other local economic development goals that are consistent with Goal 9.” Record 790.

⁸ Respondents contend the TSP only displays the general location for the east-west bypass, and that when the specific location for the east-west collector is selected, appropriate measures can be imposed at that time to mitigate any impacts there might be to existing businesses in the Coburg NIA.

1 0025 is relevant context for interpreting the goal, as it implements the fourth
2 paragraph of Goal 9. OAR 660-009-0025(8) explains what is required:

3 “Uses with Special Siting Characteristics. Cities and counties that
4 adopt objectives or policies providing for uses with special site
5 needs must adopt policies and land use regulations providing for
6 those special site needs. Special site needs include, but are not
7 limited to large acreage sites, special site configurations, direct
8 access to transportation facilities, prime industrial lands,
9 sensitivity to adjacent land uses, or coastal shoreland sites
10 designated as suited for water-dependent use under Goal 17.
11 Policies and land use regulations for these uses must:

12 “(a) Identify sites suitable for the proposed use;

13 “(b) Protect sites suitable for the proposed use by limiting land
14 divisions and permissible uses and activities that interfere
15 with development of the site for the intended use; and

16 “(c) Where necessary, protect a site for the intended use by
17 including measures that either prevent or appropriately
18 restrict incompatible uses on adjacent and nearby lands.”⁹

⁹ In 1995, this text was located at OAR 660-009-0025(4), but is now at OAR 660-009-0025(8). The applicable version in 1995 quoted below had similar wording and any difference does not alter the analysis in *Opus Development*:

“Jurisdictions which adopt objectives or policies to provide for specific uses with special site requirements shall adopt policies and land use regulations to provide for the needs of those uses.
* * * Plans and land use regulations for these uses shall:

“(a) Identify sites suitable for the proposed use;

“(b) Protect sites suitable for the proposed use by limiting land divisions and permissible uses and activities to those which

1 We further noted that there is no requirement that uses near all lands
2 zoned commercial or industrial must be limited to compatible uses, and the
3 fourth paragraph is only applicable “where the local government has designated
4 certain commercial or industrial zoned land for specific commercial or
5 industrial uses with special site requirements.” 28 Or LUBA at 693. Petitioners
6 have not demonstrated that the Light Industrial (LI) zoning that applies in the
7 Coburg NIA is for “specific commercial or industrial uses with special site
8 requirements,” or includes any specific and special site requirements for
9 particularized uses. Therefore, the fourth paragraph of Goal 9 is inapplicable
10 and does not provide a basis for remand.

11 Petitioners’ first argument that the proposed east-west bypass will
12 effectively remove land from the county’s or city’s inventory of land for
13 industrial or commercial uses is similarly without merit. The LI zone lists eight
14 uses. Petitioners’ Appendix F. As we have already explained, those uses are
15 not “specific commercial or industrial uses with special site requirements.” In
16 fact, the eighth listed use in the LI zone is “[t]ransportation facilities consistent
17 with the City’s Transportation System Plan[.]” The LI zone applied to the NIA

would not interfere with development of the site for the
intended use; and

“(c) Where necessary to protect the site for the intended
industrial or commercial use, include measures which either
prevent or appropriately restrict incompatible uses on
adjacent and nearby lands.”

1 anticipates a need for transportation facilities to serve the NIA. The county
2 was not obligated to adopt findings regarding the adequacy of its inventory of
3 commercial and industrial lands where the acknowledged zoning district that
4 applies to those lands already anticipates that at least some of those lands may
5 be used for transportation facilities.

6 Petitioners' first sub-assignment of error is denied.

7 **B. TSP Compliance with OAR 660-012-0015**

8 Petitioners argue in their second assignment of error that the TSP
9 violates OAR 660-012-0015(3)(a) which provides:

10 "Cities and counties shall prepare, adopt and amend local TSPs for
11 lands within their planning jurisdiction in compliance with this
12 division:

13 "(a) Local TSPs shall establish a system of transportation
14 facilities and services adequate to meet identified local
15 transportation needs and shall be consistent with regional
16 TSPs and adopted elements of the state TSP[.]"

17 Petitioners argue that the amended TSP will not establish a *viable* system of
18 transportation that meets the community's local needs, since the east-west
19 bypass cannot be built in its proposed location, because: (1) that proposed
20 bypass has been shown to be inconsistent with directives 3 and 4 of Goal 9 and
21 (2) because that bypass would cross over "fish-bearing Muddy Creek for at
22 least 100 feet[.]" Petition for Review 8. Since the bypass could avoid that
23 stream if located elsewhere, petitioners contend "it is very unlikely that any
24 permits would be allowed[.]" *Id.* at 9.

1 Respondents reiterate their position that the east-west bypass complies
2 with all applicable transportation rules, and that the connector is not a new
3 addition to the Coburg TSP. Respondents assert that the general location has
4 not changed from the previously acknowledged TSP. In addition, respondents
5 argue that the fish-bearing stream petitioners identify, although in the vicinity
6 of Coburg, is not located within the area proposed for the bypass.

7 We turn first to respondents’ contention that the east-west bypass
8 location is unchanged from the prior TSP. If that were true, we would deny
9 this subassignment of error because the amended TSP could not be remanded
10 for re-adopting a general location for the east-west bypass that was previously
11 adopted. Respondents asked that we take official notice of a map from the 1999
12 TSP, and we do so. Comparing that map with the map from the amended TSP
13 that is attached to this opinion as Appendix 3, it is simply not accurate to say
14 that what we are referring to as the east-west bypass is depicted at the same
15 location on the two maps.

16 Turning to petitioners’ arguments, it requires a creative reading of OAR
17 660-012-0015(3)(a) to find the “demonstration of viability” requirement that
18 petitioners read into the rule. Even if there is such a requirement, we reject
19 petitioners’ suggestion that OAR 660-012-0015(3)(a) requires, at the time a
20 transportation facility is identified as needed in the TSP, that a local
21 government establish that such facilities are “viable,” in the sense that all
22 necessary siting permits will be issued in the future if that facility is sited in the

1 location shown on the TSP. And we have already rejected petitioners
2 understanding that Goal 9 paragraph 4 applies generally to all areas zoned for
3 commercial and industrial uses. Those are the only reasons petitioners put
4 forward to support their claim that the east-west bypass is not viable.

5 The second sub-assignment of error is denied.

6 The first assignment of error is denied.

7 **SECOND ASSIGNMENT OF ERROR**

8 Petitioners argue that the county erred in adopting an amended UGB that
9 violates ORS 197.298 and the Statewide Planning Goals, and is not supported
10 by an adequate factual basis.¹⁰

11 **A. The UGB Amendment Does not Comply With Goal 9**

12 Petitioners argue that the UGB amendment also does not comply with
13 Goal 9. *See* n 5. Petitioners explain that the Coburg NIA currently abuts only a
14 small area of residential land within the city to the southwest, but the proposed
15 UGB expansion would approximately quadruple the amount of residential land
16 that would abut the NIA. *See* Appendix 2. Petitioners argue that the city failed
17 to address the conflicting nature of residential and industrial uses in approving
18 the disputed UGB amendment, particularly because there was extensive
19 testimony below regarding conflicts between the two uses attributable to,

¹⁰ ORS 197.298 was amended by legislation that took effect January 1, 2016. The version of ORS 197.298 that was in effect before that 2016 amendment took effect governs in this appeal.

1 among other things, noise and smell from industrial operations. Petitioner also
2 cites to the Coburg zoning code setback provision for industrial sites abutting
3 residential districts, arguing that the new residential zone will result in
4 “existing, protected Goal 9 resources [having] to change to accommodate the
5 new residential development” due to the future imposition of a 25-foot setback
6 from residential parcels. Petition for Review 12.

7 Respondents consider petitioners’ argument to be that new residential
8 development would require the NIA to modify its operations and accommodate
9 residential development, resulting in a failure of a Goal 9 resource.
10 Respondents argue that the portion of the NIA that is adjacent to the UGB
11 residential expansion is already built out and “no growth is possible within the
12 area of alleged concern.” That appears to be the case. *See* Appendix 2.

13 In any event, based on our disposition of the first assignment of error, we
14 disagree with petitioners that paragraph 4 of Goal 9 applies to protect the
15 Coburg NIA in the manner petitioner argues.

16 This subassignment of error is denied.

17 **B. The UGB Amendment Is Inconsistent With The ORS 197.298**
18 **Priority Scheme**

19 As we explain in more detail below, ORS 197.298 establishes priorities
20 for the types of lands that may be included in the UGB. Under the priority
21 scheme, exception lands must generally be included in the UGB before
22 agricultural lands. Exception lands are lands outside the existing UGB, for
23 which a committed exception to Goal 3 has been approved, to permit those

1 lands to be put to uses other than those allowed in exclusive farm use (EFU)
2 zones. Frequently, and in the present case, exception lands have been put to
3 low density rural residential uses. In addition, under the ORS 197.298 priority
4 scheme, where the local government must choose between agricultural lands, it
5 must generally include agricultural lands with worse productivity soils over
6 agricultural lands with soils of better productivity soils.

7 By selecting the alternative that they did, the city and county rejected
8 parts of Area 5 with higher priority exception land: North Area 5 (77 acres of
9 exception lands) and South Area 5 (20 acres of exception lands located south
10 of Coburg Road), in favor of high value agricultural land. Compare
11 Appendices 1 and 2.¹¹ In selecting lands for the identified commercial and
12 industrial development (employment lands) needs, the city and county chose to
13 include Area 8.

14 Below, we first discuss how the ORS 197.298 priority scheme is
15 supposed to work, in conjunction with the Goal 14 (Urbanization). We then
16 turn to petitioners' challenges to the findings the city and county adopted to
17 support their decision to include agricultural lands in Areas 1 and 6 instead of

¹¹ Appendix 2 shows the middle portion of Area 5 that was included. The roughly triangular southern portion of Area 5 below Coburg Road (which is Van Duyn extended west) was not included in the UGB.

1 exception lands in Area 5 and select Area 8 with better quality soils than Area
2 7, which has the worst quality agricultural soils.¹²

3 **1. Priority Scheme for UGB Amendments**

4 ORS 197.175(1) requires cities and counties to exercise their planning
5 and zoning responsibilities in accordance with state land use statutes and the
6 Statewide Planning Goals. ORS 197.298 requires that urbanization of rural
7 lands occur by expanding the UGB based on a priority scheme. Although the
8 statute partially supplants the requirements of Goal 14, the Goal continues to
9 operate in a manner that supplements the statutory priority scheme.¹³

10 The relevant text of ORS 197.298 is set out at footnote 15.¹⁴ None of the
11 11 candidate areas in this case include urban reserves or marginal lands, so

¹² The nomenclature can be confusing. In this opinion we refer to the ORS 197.298(1) priority scheme as expressing a preference for exception lands (a higher priority) over agricultural lands (a lower priority). And if agricultural lands are to be included, agricultural lands of the worst quality are a higher priority than agricultural lands of the best quality (a lower priority). ORS 197.298(2).

¹³ “[B]ecause ORS 197.298 specifically provides that its requirements are *in addition* to the urbanization requirements of Goal 14, which are particularly directed to the establishment and change of UGBs, it cannot be said that the statute was intended to supersede Goal 14.” *1000 Friends of Oregon v. LCDC*, 244 Or App 239, 260, 259 P3d 1021 (2011), *quoting Residents of Rosemont v. Metro*, 173 Or App 321, 332-333, 21 P3d 1108 (2001) (emphasis in original).

¹⁴ One of the things that complicates UGB amendments is that the statutes, rules and applicable statewide planning goals have been amended frequently. ORS 197.298 was amended in 2013 to accommodate for a new simplified urban growth boundary amendment process, but the 2013 amendment became

1 relevant priorities are set out in ORS 197.298(1)(b) and (d), exception lands
2 have priority over agricultural lands, and lower quality agricultural lands have
3 priority over better quality agricultural lands.¹⁵ Under ORS 197.298(3), lower

effective on January 1, 2016, and is irrelevant to these proceedings. All references are to the version of ORS 197.298 that existed prior to 2013.

¹⁵ Prior to amendments that took effect on January 1, 2016, ORS 197.298 provided:

“(1) In addition to any requirements established by rule addressing urbanization, land may not be included within an urban growth boundary except under the following priorities:

“(a) First priority is land that is designated urban reserve land under ORS 195.145, rule or metropolitan service district action plan.

“(b) If land under paragraph (a) of this subsection is *inadequate* to accommodate the amount of land needed, second priority is land adjacent to an urban growth boundary that is identified in an acknowledged comprehensive plan as an exception area or nonresource land. Second priority may include resource land that is completely surrounded by exception areas unless such resource land is high-value farmland as described in ORS 215.710.

“(c) If land under paragraphs (a) and (b) of this subsection is *inadequate* to accommodate the amount of land needed, third priority is land designated as marginal land pursuant to ORS 197.247 (1991 Edition).

“(d) If land under paragraphs (a) to (c) of this subsection is *inadequate* to accommodate the amount of land needed, fourth priority is land designated in an

1 priority land can be included in the UGB instead of higher priority land, where
2 the higher priority land “is found to be inadequate to accommodate the amount
3 of land” needed based on any of three reasons. *See* n 14. Those three reasons
4 are: (1) “specific types of identified land needs cannot be reasonably
5 accommodated on higher priority lands,” (2) “[f]uture urban services could not
6 reasonably be provided to higher priority land due to topographical or other
7 physical constraints,” or (3) “[m]aximum efficiencies of land uses within a

acknowledged comprehensive plan for agriculture or
forestry, or both.

“(2) Higher priority shall be given to land of lower capability as measured by the capability classification system or by cubic foot site class, whichever is appropriate for the current use.

“(3) Land of lower priority under subsection (1) of this section may be included in an urban growth boundary if land of higher priority is found to be inadequate to accommodate the amount of land estimated in subsection (1) of this section for one or more of the following reasons:

“(a) Specific types of identified land needs cannot be reasonably accommodated on higher priority lands;

“(b) Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or

“(c) Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands.” (Emphases added.)

1 proposed [UGB] requires inclusion of lower priority land in order to include or
2 provide services to higher priority land.”

3 Because Goal 14 also plays a role in amending UGBs, and because there
4 is some tension or potential inconsistency between the Goal 14 Boundary
5 Location Factors and the ORS 197.298 priority scheme, in *1000 Friends of*
6 *Oregon v. LCDC*, 244 Or App 239, 259 P3d 1021 (2011) (*McMinnville*), the
7 Court of Appeals went through a lengthy analysis of the interaction between
8 ORS 197.298 and Goal 14. In *McMinnville*, the Court of Appeals explained
9 that under ORS 197.298 and Goal 14, UGB amendments require a three-step
10 process. We summarize those three steps below, before turning to petitioners’
11 challenges to respondents’ findings.

12 Under Step One, Goal 14 “Land Need” factors 1 and 2 are applied to
13 determine the amount of land needed:

14 “Establishment and change of urban growth boundaries shall be
15 based on the following:

16 “(1) Demonstrated need to accommodate long range urban
17 population, consistent with 20-year population forecast
18 coordinated with affected local governments; and

19 “(2) Demonstrated need for housing, employment opportunities,
20 livability or uses such as public facilities, streets and roads,
21 schools, parks or open space, or any combination of the
22 need categories in this subsection (2). In determining need,
23 local government may specify characteristics, such as parcel
24 size, topography or proximity, necessary for land to be
25 suitable for an identified need. Prior to expanding an urban
26 growth boundary, local governments shall demonstrate that

1 needs cannot reasonably be accommodated on land already
2 inside the urban growth boundary.”¹⁶

3 The Court of Appeals explained that “Factors 1 and 2 necessarily require[]
4 differentiation of land use types according to their land consumption
5 attributes.” 244 Or App at 256. For example, high density residential land
6 uses consume less land per living unit than low density residential land uses.

7 After the amount of land needed is determined, Step Two requires a
8 determination whether higher priority candidate lands are adequate under ORS
9 197.298. Only if higher priority lands are “inadequate,” may lower priority
10 candidate lands be included in the UGB to meet identified land needs.¹⁷ The
11 *adequacy* inquiry under Step Two has both a straightforward quantitative part
12 (whether there are enough acres of the higher priority land to meet the

¹⁶ Goal 14 was amended in 2005 and 2006, and in *McMinnville* the Court of Appeals was concerned with the pre-2005 version of Goal 14. 244 Or App at 243. The 2005 and 2006 amendments merely rearranged the substantive provisions for clarification, with some minor wording changes. No party argues the minor changes in wording are significant in this case, and for purposes of this opinion we assume that they are not. The Goal 14 Factors 1 and 2 in *McMinnville* are now Goal 14 Land Need Factors 1 and 2 quoted above. The Goal 14 Factors 3, 4, 5 and 7 discussed in *McMinnville* are now Goal 14 Boundary Location Factors 1, 2, 3 and 4 respectively. The Goal 14 Factor 6 identified in *McMinnville* has been eliminated in the current version of Goal 14. It is similar in substance to ORS 197.298(2). *See* n 15. All citations to Goal 14 Factors in this opinion are to the current Goal 14 Land Need and Boundary Location Factors.

¹⁷ ORS 197.298(1)(b), (c) and (d) all require a finding that higher priority lands in the previous subsections of ORS 197.298(1) are “inadequate.” *See* n 15.

1 identified need) and a much less straightforward qualitative part. The
2 qualitative part of the inquiry is attributable first to ORS 197.298(3), which
3 allows including lower priority agricultural land in the UGB, instead of higher
4 priority exception land, if any of the ORS 197.298(3)(a)-(c) reasons make that
5 higher priority land “inadequate to accommodate the amount of land” needed.
6 Candidate lands that are not buildable may also be excluded as not adequate.
7 244 Or App at 262.

8 In addition to the ORS 197.298(3) reasons, Goal 14 “Boundary
9 Location” factors potentially may be applied in Step 2 to determine that higher
10 priority candidate land is “inadequate.” The Goal 14 “Boundary Location
11 Factors are set out below:

12 “The location of the urban growth boundary and changes to the
13 boundary shall be determined by evaluating alternative boundary
14 locations consistent with ORS 197.298 and with consideration of
15 the following factors:

16 “(1) Efficient accommodation of identified land needs [old
17 Factor 3];

18 “(2) Orderly and economic provision of public facilities and
19 services [old Factor 4];

20 “(3) Comparative environmental, energy, economic and social
21 consequences [old Factor 5]; and

22 “(4) Compatibility of the proposed urban uses with nearby
23 agricultural and forest activities occurring on farm and
24 forest land outside the UGB [old Factor 7].”

25 However, the Court of Appeals concluded in *McMinnville* that because Goal 14
26 Boundary Location Factors 1 and 2 have more specific and limited counterparts

1 in ORS 197.298(3)(b) and (c), *see* n 15, the ORS 197.298(3)(b) and (c) bases
2 for a finding that higher priority lands are “inadequate” apply in place of
3 Factors 1 and 2. That leaves only the Factor 3 “[c]omparative environmental,
4 energy, economic, and social consequences” and Factor 4 “[c]ompatibility of
5 the proposed urban uses with nearby agricultural and forest activities occurring
6 on farm and forest land outside of the UGB” as relevant Goal 14 Boundary
7 Location Factors in determining whether higher priority candidate lands are
8 “inadequate to accommodate the amount of land” needed as determined by Step
9 One.

10 If highest priority lands are found to be “adequate to accommodate the
11 amount of land needed,” a local government moves to Step Three, where the
12 local government applies all of the Goal 14 “Boundary Location” factors to
13 choose the “best” land within those “available” high priority lands. If highest
14 priority lands are not adequate to accommodate the amount of land needed, the
15 next lowest priority lands are reviewed for adequacy under Step Two
16 (reviewing adequacy under ORS 197.298(3) and Goal 14’s consequence and
17 compatibility Factors 3 and 4). Then local government repeats the process
18 between Step Two and Step Three until the highest priority lands accommodate
19 the need in light of Goal 14 factors or until it is determined that a broader study
20 area is required to identify a sufficient number of adequate acres.

1 **2. Petitioners’ Findings Challenges**

2 Respondents’ brief includes 35 pages in which respondents attempt to
3 explain why they believe the challenged decision properly applied the three-
4 step analysis required under the Court of Appeals’ *McMinnville* decision. But
5 respondents’ brief makes almost no attempt to acknowledge and directly
6 address petitioners’ challenges to a number of respondent’s findings. Because
7 our task on review is to determine the merits of petitioners’ challenges to those
8 findings, that failure on respondents’ part complicates our resolution of this
9 part of petitioners’ second assignment of error. While the subassignments of
10 error that we discuss separately below are technically sub-subassignments of
11 error under petitioners’ second subassignment of error, we refer to them as
12 subassignments of error to avoid the awkward phrase sub-subassignment of
13 error.

14 **a. Adjacent to the UGB (North Area 5; South Area 5)**

15 Area 5 contains 97 acres of exception lands. As we have already
16 explained, the highest priority areas in candidate areas identified by the city are
17 exception lands. Under ORS 197.298 those exception lands must be “adjacent
18 to an urban growth boundary[.]” One of the reasons respondents gave for not
19 including North Area 5 and South Area 5 in the UGB is that North Area 5 and
20 South Area 5 are not “adjacent” to the urban growth boundary. Respondents
21 relied on a dictionary definition of “adjacent,” but petitioners argue that the

1 decision should have applied the definition of “adjacent land” at OAR 660-
2 024-0060(4), which provides:

3 “In determining alternative land for evaluation under ORS
4 197.298, ‘land adjacent to the UGB’ is not limited to those lots or
5 parcels that abut the UGB, but also includes land within the
6 vicinity of the UGB that has a reasonable potential to satisfy the
7 identified need deficiency.”

8 Respondents do not respond to the argument. The response brief merely
9 touches on adjacency as one of the reasons “one portion of study area 5” was
10 excluded, in part due to being “separated by approximately one half mile from
11 Coburg and only marginally connected to the rest of study area 5 across a
12 heavily traveled road.” Respondents’ Brief 38. Although respondents do not
13 cite to it, we understand the primary finding on adjacency to be at Record 747,
14 which appears to conclude that North Area 5 and South Area 5 are not adjacent
15 to the UGB, but does not address OAR 660-024-0060(4).

16 OAR Chapter 660, Division 24, is LCDC’s administrative rule
17 concerning urban growth boundaries and is, at the very least, relevant context
18 regarding the meaning of the word “adjacent” in ORS 197.298(1). More to the
19 point, in contrast to respondents’ argument that area 5 is not “adjacent” to the
20 existing UGB, the findings seem to indicate that all eleven study areas were
21 considered “adjacent” for purposes of the UGB amendment: “Map 11 of the
22 2010 Urbanization Study shows ‘built upon and developed’ exception areas * *
23 * and natural resource areas * * * *located adjacent to the Coburg Urban*
24 *Growth Boundary.*” Record 728 (emphasis added). See Record 1441 (showing

1 Map 11 with all of the study areas including North and South Area 5). Absent a
2 better explanation from the city, we agree with petitioners that the city erred in
3 finding that North Area 5 and South Area 5 are not adjacent to the city’s
4 existing UGB.

5 This subassignment of error is sustained.

6 **b. Access to Coburg Road (South Area 5)**

7 Petitioners’ next subassignment of error challenges findings concerning
8 access to Coburg Road from South Area 5. Respondents apparently found that
9 South Area 5 could be eliminated as candidate exception land because Lane
10 County spacing standards for new access to minor arterials render it
11 unbuildable. Record 749. Petitioners argue that finding is not supported by the
12 record. Petitioners contend South Area 5 has considerable depth to develop an
13 internal road system with only a few access points on Coburg Road.
14 Petitioners attach Lane County Code sections addressing access to county
15 roads and contend they do not support respondents finding that additional
16 access for South Area 5 is not possible.

17 The response brief does not specifically acknowledge and address
18 petitioners’ argument. However, respondents do argue that South Area 5

19 “would not support any of the residential development * * *. Only
20 two parcels are large enough to contain any undeveloped area
21 suitable for development and they both have some floodplain areas
22 on them. * * * Most important are the transportation limitations on
23 these two parcels. Any development on them would require
24 additional access to busy Coburg Road where the layout of
25 existing driveways and Stallings Lane in the area would mean a

1 violation of Coburg’s driveway and street spacing requirements.”
2 Respondents’ Brief 53.

3 If respondents’ rationale for excluding South Area 5 is that existing
4 driveways and county street spacing requirements make South Area 5
5 unbuildable, that rationale is not sufficiently explained with reference to the
6 city or county spacing standards respondents are relying on. In addition, as
7 discussed further below, absent an identified need for residential land with
8 particular parcel sizes, which the city did not justify under *McMinnville* Step
9 One for residential lands, respondents cannot exclude exception lands as
10 inadequate simply because they are parcelized. Parcel size is one of the factors
11 that can be relied on to justify an irrevocably committed exception in the first
12 place. 660-004-0028(6)(c). Disregarding exception lands simply because they
13 are parcelized, without more, is inconsistent with the ORS 197.298(1) priority
14 scheme.

15 This subassignment of error is sustained.

16 **c. Conflicts with TSP (North Area 5)**

17 The county adopted the following finding:

18 “Coburg is developing a multi modal path around the current UGB
19 to facilitate non-vehicular movement in Coburg. Inclusion of
20 Stallings Lane properties, especially those distant from the rest of
21 Coburg, would be directly contrary to the concept of the multi
22 modal path as a resource available for all Coburg residents, and
23 would negate the development work on the path that has already
24 been accomplished.” Record 750.

25 Petitioners argue:

1 “There is no evidence for this assertion; nothing prevents the
2 residents of North Area 5 from accessing the multi-modal path.
3 The residents in North Area 5 are no more distant from the multi-
4 modal path than downtown residents. In any event, the record
5 does not contain even a basic explanation of how the urbanization
6 of Area 5 could negatively impact the proposed path.” Petition for
7 Review 19.

8 We agree with petitioners. But more to the point, respondent may not
9 eliminate candidate exception lands, or in the words of ORS 197.298(1) decide
10 such lands are “inadequate,” simply because respondent believes development
11 of those exception lands is inconsistent with the “concept” of a planned
12 transportation facility. Exception land probably could be deemed “inadequate”
13 if, for example, a planned transportation facility would render the exception
14 land unbuildable. But respondent has not shown that to be the case.

15 **d. Goal 14, Boundary Location Factor 3**
16 **Environmental Consequences (Area 7)**

17 Assuming that exception lands are inadequate to accommodate identified
18 land needs, under ORS 197.298(1)(d) lower priority agricultural lands can be
19 included in the UGB. However, in that circumstance, ORS 197.298(2) makes
20 agricultural land with poorer soils a *higher* priority than agricultural lands with
21 better soils.

22 Portions of Areas 1 and 6 were included in the UGB. Areas 1 and 6
23 contain high quality Class I and II soils. Area 7, which was not included in the
24 UGB, has Class IV soils. Since Area 7 has poorer soils than Areas 1 and 6,
25 under ORS 197.298(2), Area 7 is a higher priority for a UGB expansion and

1 absent a relevant consideration to the contrary should have been included
2 before Areas 1 and 6.

3 As part of *McMinnville* Step Two, a local government may consider Goal
4 14, Boundary Location Factor 3 “[c]omparative environmental, energy and
5 economic and social consequences” when determining if higher priority land
6 adequately accommodates identified land needs. Respondent relied in part on
7 Goal 14, Boundary Location Factor 3 to include portions of Areas 1 and 6, and
8 not include Area 7, based on “the environmental consequences of development
9 within the 100-year floodplain and impacts to mapped wetlands.” Record 736-
10 37.

11 Petitioners argue:

12 “* * * There is no factual basis for this assertion. The findings
13 concede that, out of Area 7’s 240 acres, only 23 acres are either
14 floodplain or wetland, and inspection of the City’s mapping
15 reveals that area lies at the far north end, well away from the area
16 closest to the city center and most likely to be urbanized.
17 Furthermore, the findings do not explain why the consequences of
18 urbanizing Area 7 would be so severe that these areas would be
19 ‘inadequate’ under ORS 197.298(1).” Petition for Review 19
20 (record citations omitted).

21 We have not been able to locate a cognizable response to petitioners’
22 arguments concerning respondent’s reliance on Goal 14, Boundary Location
23 Factor 3 environmental consequences to include portions of Areas 1 and 6
24 while not including Area 7. This subassignment of error is sustained.

1 **e. Goal 14, Boundary Location Factor 3 Social**
2 **Consequences (Areas 5 and 7)**

3 Petitioners also assign error to respondent’s rejection of North Area 5
4 and Area 7 based on Goal 14, Factor 3 “[c]omparative * * * social
5 consequences[.]” The findings identified by petitioner concerning Area 5 are
6 as follows:

7 “* * * Existing residents of [Area 5] were split in terms of wishing
8 incorporation into the Coburg Urban Growth Boundary.
9 Therefore, inclusion of this exception land into the urban growth
10 boundary is inappropriate and would not accommodate the
11 residential land need pursuant to Factor 3 * * * social (resident
12 opposition) impacts * * *.”Record 735.

13 The findings identified by petitioners concerning Area 7 are as follows:

14 “[E]xtension of the urban growth boundary to the east side of
15 Interstate 5 has been a source of significant opposition from rural
16 property owners to the east.” Record 736.

17 Petitioners argue the record does not support respondent’s finding of
18 significant opposition to including North Area 5 in the UGB. Petitioners also
19 argue:

20 “Beyond the factual deficiencies, the Decision does not contain
21 any reasoning explaining why the disappointment of property
22 owners constitutes a valid basis for decision making, let alone a
23 bona-fide ‘social consequence’ contemplated by Goal 14 that
24 would be so severe that any part of Area 5 or Area 7 would be
25 rendered ‘inadequate’ under ORS 197.298(1). In addition, the
26 findings do not reconcile the obvious contradiction between the
27 exclusion of North Area 5 from [the] UGB and the simultaneous
28 inclusion of Mid Area 5 located just to the south. * * *” Petition
29 for Review 20-21.

1 Lane study area appeared at some of these events. The majority of
2 people from Stallings Lane who appeared expressed objections to
3 being included in the proposed UGB expansion. Coburg must plan
4 for properties becoming available on a regular basis over time.
5 The process will not work if the current property owners, or
6 replacement property owners who have purchased an operating
7 farm, do not wish to give up that lifestyle for urban residential
8 uses. If there is a significant delay in properties in the area
9 becoming available then Coburg will not be able to meet its need
10 over the next twenty years. If Coburg were to include only the
11 properties along Stallings Lane and these properties did not
12 become available for years, Coburg would have failed its
13 responsibilities to actually provide for reasonable residential
14 growth. Given the evidence in the record, Coburg had no choice
15 except to consider that these properties would not be available.”
16 Record 748 (footnote omitted).

17 Petitioners contend that if property owner opposition to urbanization is
18 sufficient to render candidate exception lands “inadequate” under ORS
19 197.298(1), the ORS 197.298 priority scheme will not work as the legislature
20 intended. Presumably that is because at least some of the residents of rural
21 exception lands will always prefer to retain the rural residential nature of their
22 properties. Moreover, petitioners argue, the record does not support
23 respondents’ speculation that property owner opposition will mean that land
24 will not be redeveloped to meet higher density residential land needs if the land
25 is brought into the UGB. Petitioners additionally dispute that the level of
26 opposition in Area 5 is as significant as respondents suggest and point out that
27 past failures to redevelop lands brought into the UGB are not predictive of the
28 future, since the city did not even have a sewer system until a few years ago.
29 Finally, the record includes a study that petitioners contend demonstrates that

1 exception lands that are brought into the UGB in fact do redevelop at higher
2 densities.

3 If there are responses to petitioners’ arguments in the challenged
4 decision, respondents do not call them to our attention. We generally agree
5 with petitioners that mere expressions of opposition to urbanization or
6 redevelopment cannot be a basis for determining that exception land is
7 “inadequate to accommodate” identified land need. There must be a real and
8 substantial basis for concluding that rural lands brought inside the UGB, so that
9 those lands can be provided urban services and become valuable for
10 development and redevelopment, will nevertheless remain in their rural
11 underdeveloped condition during the planning period.

12 This subassignment of error is sustained.

13 **g. Goal 14, Boundary Location Factor 4**
14 **Compatibility With Nearby Agricultural Activities**
15 **(South Area 5 and North Area 5)**

16 Petitioners assign error to respondents’ exclusion of North Area 5 and
17 South Area 5, based on Goal 14, Boundary Location Factor 4’s compatibility
18 factor, which permits consideration of “[c]ompatibility of the proposed urban
19 uses with nearby agricultural and forest activities occurring on farm and forest
20 land outside of the UGB” when determining if candidate land is adequate to
21 accommodate the land need. Petitioners argue that “the findings do not contain
22 descriptions of the adjacent farm activities or any analysis of how those
23 particular farm activities could be affected by urbanization of adjacent land.”

1 Petition for Review 24. Petitioners argue remand is appropriate, because “the
2 findings are not sufficiently descriptive of nearby agricultural uses to allow
3 comparison among the candidate sites[,]” citing *McMinnville*, 244 Or App at
4 287. Petitioners also argue that respondent treated exception areas
5 inconsistently by including 13.6 acres in Area 1, with Class I and II soils, while
6 excluding 20-acre South Area 5, exception land, based on agricultural activity
7 conflicts, when those two areas appear to be very similarly situated.

8 Respondents do not clearly respond to petitioners’ arguments under this
9 subassignment of error.

10 We agree with petitioners. Exclusion of candidate land based on
11 incompatibility between existing agricultural operations and proposed
12 residential zoning must identify those agricultural practices and explain why
13 any incompatibility justifies deviating from the ORS 197.298(1) priority
14 scheme. Respondents also must address petitioners’ contention that for *all*
15 candidate land there is some level of agricultural conflict, because every study
16 area abuts farmland. Record 744 (“the compatibility impacts do not appear to
17 be much different between the UGB study areas.”) This sub-assignment of
18 error is sustained.

19 **h. Traffic Impacts (North Area 5)**

20 Petitioners argue that respondents erred in using the lack of an existing
21 east-west bypass to exclude portions of Area 5 as unavailable to meet identified
22 residential land needs. Respondents found:

1 “The potential of a significant increase in traffic along Coburg
2 Road if the exception area of Stallings Lane is included in the
3 Coburg UGB significantly exacerbates the public safety issues that
4 Coburg now faces. * * *

5 ““This public safety problem can only be alleviated if an East-West
6 connector^[18] is constructed to give emergency services an
7 alternative means to access Coburg. Until that time, any residential
8 development along Stallings Lane will mean an unacceptable
9 increase in traffic, unacceptable because it would significantly
10 increase the risk of isolating parts of Coburg from emergency
11 services.” Record 750.

12 “Transportation and public safety issues serve as a limiting factor
13 for any of the exceptions areas of Stallings Lane being included in
14 the proposed Coburg UGB. If, however, a connector could be built
15 across the lower priority land adjacent to and just north of the
16 current Coburg UGB, the connector would provide an alternative
17 means to access the properties along Stallings Lane and reduce or
18 relieve the practical limitations on developing any part of Stallings
19 Lane.” Record 752.

20 Petitioners contend it is inconsistent for the city to (1) acknowledge that
21 any transportation impact problems that might be caused by included North
22 Area 5 would be solved by the east-west bypass, (2) include the east-west
23 bypass as a project in the updated TSP, and (3) nevertheless exclude North
24 Area 5 on the basis of adverse traffic impacts without the east-west bypass.

25 Respondents state that Area 5 was determined to be inappropriate for
26 residential development because:

¹⁸ The referenced East-West Connector is what we refer to as the east-west bypass. In the record it is also sometimes referred to as the East-West Collector.

1 Under *McMinnville*, reliance on Factor 2 is inappropriate, but Factor 3 is
2 potentially applicable.

3 Petitioners contend that deviating from the ORS 197.298(1) priority
4 scheme to include agricultural land instead of exception land is only
5 appropriate for cost of service reasons under ORS 197.298(3)(b), which allows
6 selecting lower priority exception lands where they are needed “to provide
7 services to higher priority lands.” *See* n 15.

8 Respondents do not specifically respond to the argument, except to argue
9 that Coburg found that “the higher per residential unit cost of water and service
10 services [sic] to properties along Stallings Lane * * * were inhibiting factors
11 that would slow any development, so that the Stallings Lane area was unlikely
12 to meet the standards for efficient accommodation of the identified need[.]”
13 Respondents’ Brief 40.

14 Petitioners’ broad assertion that exception lands can only be rejected for
15 cost of service reasons under ORS 197.298(1) in the circumstances set out in
16 ORS 197.298(3)(b) (“Maximum efficiency of land uses within a proposed
17 urban growth boundary requires inclusion of lower priority lands in order to
18 include or to provide services to higher priority lands”) finds support in
19 *McMinnville*. There the court concluded “any inefficiency in the provision of
20 urban services and facilities is not material to the analysis under ORS
21 197.298(1).” 244 Or App at 276. The court also concluded “[t]he city’s
22 evaluation of the cost-effectiveness of the provision of public facilities and

1 services is immaterial to the analysis under ORS 197.298(1) during Step Two.”
2 244 Or App 278. The court apparently considers cost of providing services to
3 be an “efficiency” issue under Goal 14 Boundary Location Factor 1, which is
4 irrelevant at Step Two, rather than an economic issue that is potentially
5 applicable under Goal 14 Boundary Location Factor 3.

6 Moreover, we agree with petitioners that the record appears to indicate
7 that providing services to Area 5 is relatively cheap. Record 493 (“According
8 to Coburg’s Public Works Director, Study Area 5 is one of the least expensive
9 areas to extend City water and stormwater service into.”) To the extent
10 respondents excluded portions of Area 5 due to perceived economic
11 consequences of providing needed services, the city erred.

12 This subassignment of error is sustained.

13 **j. Urban Form (North and South Areas 5, and Area**
14 **7)**

15 Petitioners assert that respondents erroneously eliminated North Area 5,
16 South Area 5, and Area 7, thus deviating from the ORS 197.298(1) priority
17 scheme, on the basis that including those areas does not meet Coburg’s criteria
18 for urban form and violate comprehensive plan policies that pertain to orderly
19 and efficient development. Respondents contend those policies call for a
20 concentrically shaped urban area.

21 “Several policies were applied to limit the area of study area 5 that
22 would be included in the needs analysis.

23 **Policy 1:** The City shall preserve urbanizable land
24 and provide for orderly, efficient development by

1 controlling densities through provision of the Zoning
2 and Subdivision Ordinances, thereby preventing the
3 need for overly extensive public services and
4 restricting urbanization to that commensurate with the
5 carry capacity of the land.

6 “**Policy 17:** The City shall promote the efficient use
7 of land within the urban growth boundary and
8 sequential development that expands in an orderly
9 way outward from the existing city center.

10 “**Policy 19:** The City shall accommodate projected
11 growth, expand the urban growth boundary in a
12 manner that balances the need to protect high quality
13 farm and forest resource lands with the needs of the
14 existing and future population and with efficient
15 public facility and service delivery.

16 2010 Coburg Urbanization Study pg 172

17 “These policies, emphasizing orderly and efficient growth argued
18 against considering exception land to meet a residential need that
19 was more than twice as far from the city center than any current
20 residential land. To consider this land as ‘needed residential land’
21 the City would have to pass over land that was already partially
22 within the UGB and was surrounded on three sides by the existing
23 city. The City determined that to consider such land needed would
24 be contrary to the city policies. Based on that analysis, the City
25 adopted and applied a local criteria in considering need:
26 *‘Expansion should be limited to areas and tax lots that would*
27 *promote sequential development that expands in an orderly way*
28 *outward from the existing city center, and promote a street*
29 *network that expands in an orderly way outward from the existing*
30 *city center, and promote a street network that is interconnected in*
31 *order to promote connectivity and community interaction.’* 2010
32 Coburg Urbanization Study pg 173. This criteri[on] rules out the
33 most distant portions of Stallings Lane because it did not fit the
34 local criteria of needed land.” Record 763-64 (boldface and italics
35 in original).

1 The *McMinnville* court noted that “[c]onsiderations of urban form under
2 Goal 14 * * * are more appropriately deferred to Step Three, during the full
3 application of Goal 14 to candidate lands identified under the priorities
4 statute.” *McMinnville*, 244 Or App at 278. If respondents were selecting which
5 of the available and suitable exception lands “should be added to the
6 boundary,” under *McMinnville* Step Three, it would be entirely appropriate to
7 apply the urban form policies and select the exception lands that are most
8 consistent with those policies. But to the extent respondents applied the urban
9 form policies to exclude exception lands and higher priority farm land (portions
10 of Area 5 and Area 7) from further consideration under ORS 197.298(1) in
11 *McMinnville* Step Two, as appears to be the case here, respondents erred.

12 This sub-assignment of error is sustained.

13 Subassignment of error B is sustained.

14 **C. Error To Include Area 6 Farmland to Accommodate Need For**
15 **Multi-Family Residential Land**

16 Area 6 is agricultural land that contains Class I and II soils. As noted
17 earlier, ORS 197.298(3) sets out three reasons that may be relied on to deviate
18 from the ORS 197.298(1) priority scheme and include within a UGB lower
19 priority lands instead of higher priority lands. One of those reason is “specific
20 types of identified land needs cannot be reasonably accommodated on higher
21 priority lands.” Petitioners argue the city has not shown exception lands or
22 lands within the city’s existing UGB cannot reasonably accommodate the
23 identified multi-family housing land need.

1 It is not entirely clear to us that respondent’s legal theory for including
2 Lower Area 6 was because it is needed for multi-family housing that cannot
3 reasonably be accommodated on exception land. But respondents do not
4 dispute the point, so we assume that is the case.

5 Petitioners make a number of arguments. First, petitioners contend that
6 30 of the 47 acres in Area 6 have been designated for low density housing, not
7 multi-family housing. So at most, a need for land that can reasonably
8 accommodate multi-family housing could only justify 17 of those 47 acres.
9 Second, petitioners contend the city has not adequately explained why the
10 entire need for multi-family housing cannot be accommodated inside the
11 existing UGB, by rezoning some land now designated for low density housing
12 if necessary. Third, while the city cites a need to site multi-family housing
13 away from “the Coburg Historic District or any developed neighborhoods,”
14 petitioners contend there is no evidence to support that assertion. Finally,
15 petitioners challenge respondents’ findings that the need to aggregate smaller
16 parcels in the North and South Area 5 and landowner opposition to multi-
17 family development means those exception lands cannot reasonably
18 accommodate multi-family housing, arguing those observations are not
19 sufficient to establish that multi-family housing “cannot be reasonably
20 accommodated” in those exception areas.

21 In its response brief, respondents do not point to any findings in the
22 decision that respond to the issues raised under this subassignment of error.

1 We do not foreclose that possibility that circumstances in irrevocably
2 committed lands could pose such challenges to development of multi-family
3 housing that the city could find and justify a decision that multi-family housing
4 cannot “be reasonably accommodated” on such exception lands. But
5 generalized concerns about parcelization complicating site acquisition or
6 property owner opposition to multi-family housing fall far short of making the
7 demonstration required under ORS 197.298(3)(a) that “specific types of
8 identified land needs cannot be reasonably accommodated on higher priority
9 lands.”

10 This subassignment of error is sustained.

11 **D. Error to Include Area 6 Farmland to Site East-West Bypass**

12 Area 6 is exclusive farm use zoned land composed of Class I and II soils.
13 There is no dispute that Van Duyn Street, which provides access to downtown
14 Coburg, is experiencing congestion at two intersections west of the city. *See*
15 Appendix 3. Petitioners argue respondent improperly relied on ORS
16 197.298(3)(c) to include the lower part of Area 6 to allow construction of the
17 east-west bypass to resolve access problems associated with this traffic
18 congestion.¹⁹ Under ORS 197.298(3)(c), lower priority land may be included
19 within the UGB ahead of higher priority land if “[m]aximum efficiency of land

¹⁹ Respondents at one point proposed to include a larger part of Area 6, but when faced with opposition settled on the smaller portion of Area 6, primarily to allow construction of the east-west bypass.

1 uses within a proposed urban growth boundary requires inclusion of lower
2 priority lands in order to include or to provide services to higher priority
3 lands.” Respondents found:

4 “Transportation and public safety issues serve as a limiting factor
5 for any of the exceptions areas of Stallings Lane being included in
6 the proposed Coburg UGB. If, however, a connector could be built
7 across the lower priority land adjacent to and just north of the
8 current Coburg UGB, the connector would provide an alternative
9 means to access the properties along Stallings Lane and reduce or
10 relieve the practical limitations on developing any part of Stallings
11 Lane.

12 “The lower priority agricultural land must be included to provide
13 urban levels of service to the higher priority land along Stallings
14 Lane.” Record 752-53.

15 Petitioners first note in *McMinnville*, the Court of Appeals determined
16 that the scope of “services” in ORS 197.298(3)(c) does not include “roads.”
17 244 Or App at 275. Although petitioners recognize that respondent also cites
18 “public safety issues,” we understand petitioners to contend the public safety
19 issues are indistinguishable from the roads that would be used to provide them.

20 We reject petitioners’ argument that respondent is categorically
21 precluded from relying on ORS 197.298(3)(c) to include the lower part of Area
22 6 to provide needed police and other emergency services to Area 5. That those
23 services would be provided by using roads does not mean they are the same
24 thing as a road. Area 5 apparently does currently suffer from poor access for
25 police and other emergency services and would suffer even more if that Area
26 were developed more densely without transportation improvements of some

1 sort that would allow quicker emergency access. However, that does not
2 necessarily mean that respondents have demonstrated that “[m]aximum
3 efficiency of land uses” requires inclusion of 47 acres of agricultural land in
4 Area 6 in order to provide faster emergency services to the Area 5 exception
5 lands.

6 Petitioner next argues that including the lower portion of Area 6 to
7 resolve public safety issues with Area 5 is unnecessary because the TSP
8 already proposes an emergency access onto Coburg Bottom Loop Road that
9 would address the problem. Record 824, 826. Petitioners also argue there is
10 currently sufficient area within the Coburg UGB to locate an east-west bypass
11 north of Van Duyn Road without adding Area 6.

12 Respondents’ answer that the emergency access petitioners identify was
13 included in the TSP to improve emergency access to western neighborhoods in
14 the city, not to solve the larger east-west congestion problem on Van Duyn.
15 Respondents are correct. Record 826. But respondents offer no response that
16 we can see to petitioners’ contention that the needed east-west bypass could be
17 constructed north of Van Duyn without having to expand the UGB into the
18 lower part of Area 6. Remand is required for respondent to address that issue.

19 Finally, petitioners argue the real issue for the city with regard to the
20 east-west bypass is financial, not “maximum efficiency of land uses.”
21 Petitioners contend respondent improperly seeks to allow development of the
22 lower part of Area 6 in order to fund the east-west bypass. Respondents

1 respond that the city has traditionally relied on private development to finance
2 transportation infrastructure and that there is nothing improper about making
3 financing of the east-west bypass a factor under ORS 197.298(3)(c).

4 We agree with petitioners. As the Court of Appeals explained in
5 *McMinnville*, the scope of “services” in ORS 197.298(3)(c) does not include
6 “roads.” 244 Or App at 275. If the real reason respondents included the lower
7 part of Area 6 was to allow development that would generate the funding
8 necessary to build the east-west bypass (a road), respondents erred in relying
9 on ORS 197.298(3)(c) to include Area 6.

10 **E. Error to Include Area 1 Farmland to Accommodate Need for**
11 **Multi-Modal Path**

12 Area 1 is predominantly agricultural land composed of Class I and II
13 soils. One of the reasons given for including agricultural land in Area 1 into the
14 UGB was to “provide a means to complete a portion of the Coburg Loop Multi-
15 Modal Path.” Record 751

16 Petitioners point out the proposed multi-modal path crosses agricultural
17 lands in other places that are not being included in the UGB and that under
18 OAR 660-012-0065(3)(h), “[b]ikeways, footpaths and recreation trails” are
19 specifically authorized transportation improvements on rural land, so there is
20 no need to include agricultural soils in Area 1 to develop the multi-modal path.

21 We agree with petitioners. This subassignment of error is sustained.

1 **F. Conclusion**

2 Petitioners have successfully challenged a large number of the findings
3 that respondents adopted to exclude 97 acres of exception lands in North Area
4 5 and South Area 5 from consideration under ORS 197.298(1), and to include
5 prime agricultural lands in parts of Area 6 and Area 1, notwithstanding that
6 ORS 197.298(2) prioritizes exception lands. Petitioners have successfully
7 challenged findings respondent adopted to justify including land with better
8 quality agricultural soils in Areas 6 and 1, while not including land with poorer
9 quality agricultural soils in Area 7, whereas ORS 197.298(2) puts a higher
10 priority on including lands with poorer quality agricultural soils first. Finally,
11 we have sustained petitioners’ challenges to respondents’ reliance on ORS
12 197.298(3) to include lands with lower priority under ORS 197.298(1) in place
13 of lands with higher priority under ORS 197.298(1) to meet identified need for
14 multifamily housing, a multi-modal path and the east-west bypass.

15 Remand is therefore required under the second assignment of error for
16 respondents to correct those findings if they can, eliminate any findings that it
17 cannot correct, and adopt any supplemental findings they may wish to adopt to
18 support a UGB expansion that is consistent with ORS 197.298(1) and relevant
19 Goal 14 factors. To the extent our discussion above has not made this point
20 clearly enough, respondents appear to view Goal 14, Boundary Location Factor
21 3 “[c]omparative environmental, energy, economic and social consequences”
22 and Goal 14 Boundary Location Factor 4 “[c]ompatibility of the proposed

1 urban uses with nearby agricultural and forest activities occurring on farm and
2 forest lands outside the UGB” and ORS 197.298(3) as a more available
3 vehicles for not following the ORS 197.298(1) priorities for including
4 exception lands first and including poorer agricultural lands before including
5 better agricultural lands than is actually the case. In applying the Goal 14
6 Boundary Location Factors, respondents must do more than identify possible
7 environmental, energy, economic or social consequences, and possible
8 incompatibilities with agricultural activities if exception lands or poorer quality
9 agricultural soils are included according to the ORS 197.298(1) priorities.
10 Respondents must establish that such considerations justify deviating from the
11 statutory priorities, notwithstanding the legislature’s expressed preference for
12 those priorities. Respondents should not underestimate the difficulty of making
13 such a demonstration. A similar caution is appropriate for attempts to use ORS
14 197.298(3) to avoid the ORS 197.298(1) priority scheme.

15 The second assignment of error is sustained in part.

16 **THIRD ASSIGNMENT OF ERROR**

17 Respondents included Area 8 in the UGB to meet the projected need for
18 land for commercial and industrial purposes (employment lands). Area 8 is
19 located east of Interstate 5 and includes 106 acres. In their third assignment of

1 error, petitioners challenge the adequacy of the factual base for including Area
2 8 under Goals 9 and 14.²⁰

3 As the Court of Appeals noted in *Zimmerman v. LCDC*, 274 Or App 512,
4 514, 361 P3d 619 (2015):

5 “* * * Goal 14 (Urbanization) requires a city to adopt and
6 maintain an urban growth boundary around its city limits “to
7 provide land for urban development needs and to identify and
8 separate urban and urbanizable land from rural land.” OAR 660–
9 015–0000(14). Establishment and change of a UGB must be based
10 on a number of factors, including a “[d]emonstrated need for * * *
11 employment opportunities.” *Id.* Under OAR 660-024-0040(5), in
12 turn, the determination of that need “must comply with the
13 applicable requirements of Goal 9 and OAR chapter 660, division
14 9, and must include a determination of the need for a short-term
15 supply of land for employment uses consistent with [OAR] 660–
16 009–0025.”

17 Accordingly, a city estimates future employment to determine the need for
18 employment lands in order to comply with the applicable Goal 14 and 9
19 requirements.

20 Here, respondents adopted a number of documents in support of their
21 decisions, including the economic lands component of the 2010 Coburg
22 Urbanization Study (2010 Study) (Record 308-634), the 2014 Regional
23 Economic Analysis (REA) (Record 635-666), and the 2014 Coburg
24 Urbanization Study Update (2014 Update) (Record 289-307). Respondents
25 explain that the 2010 Study documented the nature of industrial lands needed,

²⁰ The ORS 197.298(1) priority scheme is not an issue under this assignment of error.

1 citing Record 467. While the 2010 Study identified a surplus of employment
2 land, it also noted the city’s employment lands might not be suitable for some
3 kinds of uses.²¹ Respondents also note that the 2014 Update took into account
4 changing economic conditions, with the assumption that Coburg would restore
5 a large number of jobs that were lost during the 2007 recession and projected
6 additional job growth based on Oregon Employment Department (OED)
7 projections for Lane County Job Growth. Record 305-306. The 2014 update
8 analyzes regional economic projections and provides:

²¹ Record 467 (part of the 2010 Study) includes the 2010 comparative analysis for land supply and demand and long term projections for 2010-2030 and includes the following findings:

“The City of Coburg has a surplus of land within all employment categories, however the surplus for Industrial Uses is not seen as sufficient in size or characteristic to accommodate the City’s economic opportunities.

“The City should add approximately one lot or tract of land consisting of 20-70 acres of land to accommodate flexibility in responding to industry employment opportunities during the planning period (2010-2030).

“ * * * * *

“Long Term Supply/Demand Summary[:]The City of Coburg is currently faced with a supply of buildable land designated for commercial and office purposes that is insufficient to meet future long-term demand. The City is also faced with a limited supply of available and appropriate buildable land designated for industrial purposes.” (Emphasis added.)

1 “The findings of the Regional Economic Analysis for Coburg
2 culminate in two recommended scenarios which are outlined as
3 follows:

4 “Scenario A – Job Recapture with OED Forecast Update. This first
5 scenario is modeled to align with the forecast methodology
6 provided with the 2010 Urbanization Study. Assumptions integral
7 to this updated forecast estimate are that:

8 “Coburg job loss experienced during the recession will be
9 recaptured (to refill vacated space) so that forecast job
10 growth occurs as an add-on to pre-recession peak
11 employment conditions requiring net added industrial and
12 commercial land as was previously assumed with the 2010
13 Urbanization Study.

14 “Lane County employment forecast projections are updated
15 for consistency with the most current available OED
16 regional forecast – reflecting higher county-wide job growth
17 rates than were utilized with the 2010 Urbanization Study
18 (as is also consistent with DLCDC Safe Harbor provisions for
19 estimating EOA land needs).

20 “Scenario B – Economic Opportunity with Regional Large Site
21 Market Capture. A second scenario is predicated as an economic
22 opportunity for Coburg to serve regional needs for large 20+ acre
23 sites that require I-5 freeway access in addition to capturing its
24 Safe Harbor share of regionally forecast job growth:

25 “This enhanced economic opportunity is consistent with the
26 findings of the 2010 Urbanization Study that Coburg has
27 been, and could remain, competitive for large manufacturing
28 and distribution-related industrial firms, particularly if 20+
29 acre sites were designated and made available for industrial
30 development.

31 “Coburg’s competitive opportunity is reinforced by
32 economic analyses recently prepared for other jurisdictions
33 in Lane County – all of which confirm a demand for but

1 relative dearth of 20+ acre sites situated in close proximity
2 to the I-5 transportation corridor.

3 “Scenario B of the REA includes three sub-scenarios, one which
4 assumes 10% regional large site industrial capture, one which
5 assumes 20% regional large site industrial capture and one that
6 assumes a fairly aggressive 30% regional large site industrial
7 capture.

8 “Neither scenario presented in the Regional Economic Analysis is
9 expressly rejected by the City of Coburg in this addendum. At
10 their cores both scenarios are generally consistent with the primary
11 assumptions of the current Urbanization Study. Table A.17
12 outlines scenarios details, including total regional large site
13 acreage demand, an assumed vacancy percentage, and local
14 industrial land supply (from the buildable lands analysis).

15 “ * * * * *

16 “All of the scenarios evaluated support the continued need for a
17 UGB expansion of at least 40 acres to as much as 195 acres based
18 on forecast need for large industrial sites within Coburg and the
19 Central Lane County region.” Record 305-306 (footnotes omitted).

20 The 2010 study had predicted a total of 247 industrial jobs and 368 commercial
21 jobs, totaling 615 new jobs over twenty years. The 2014 Update includes the
22 following observation:

23 “If Coburg’s job growth rate were adjusted upwards to reflect the
24 updated overall growth expectations for Lane County * * *, the
25 employment gain within Coburg’s UGB would double from the
26 previous projection of an added 615 jobs to 1,292 net added jobs
27 over a 20-year planning horizon. It is noted by LCOG staff that a
28 truly sector specific forecast was not possible given the
29 information that economist Eric Hovee was provided. The figure
30 1,292 based on Lane County’s AAGR [average annual growth
31 rate] reflects an estimate assuming the highest realization of
32 Coburg matching Lane County growth rates. That number (1,292),

1 in all likelihood would be smaller, and could potentially be
2 significantly smaller.” Record 303-304.

3 Intervenor and respondents (respondents) explain that the 2014 Update
4 confirmed the 2010 analysis, did not recommend any particular regional
5 scenario, but expressly stated that none were rejected and concluded that all of
6 the scenarios were generally consistent with the original assumptions regarding
7 employment land needs presented in 2010.

8 Petitioners’ third assignment of error is a series of loosely connected
9 challenges, focusing in large part on what petitioners contend are unresolved
10 inconsistencies in the 2010 Study, REA, and 2014 Update. Respondents answer
11 that petitioners’ confusion regarding the jobs forecasts is of petitioners’ own
12 making, and that the UGB decision is supported by an adequate factual basis.
13 Respondents contend that the economic land component of the decision and its
14 adopted findings are consistent with Goal 14 Urbanization and its
15 implementing administrative rules. Respondents quote OAR 660-024-0040 as
16 the governing rule for determining land need for industrial lands, emphasizing
17 that a local government is required to provide a reasonable justification for the
18 job growth estimate but Goal 14 does not require that job growth estimates
19 necessarily be proportional to population growth.²² Below we have attempted

²² OAR 660-024-0040(5) provides in relevant part:

“ * * * the determination of 20-year employment land need for an urban area must comply with applicable requirements of Goal 9 and OAR chapter 660, division 9, and must include a

1 to identify each of petitioners’ separate arguments under this assignment of
2 error.

3 **A. Adequacy of the Decision for Review (Petition for Review 39-**
4 **43)**

5 Petitioners argue that the 2014 Update reveals that only ranges of
6 forecasts and land needs were presented and none were actually selected
7 (“Neither scenario presented in the Regional Economic Analysis is expressly
8 rejected by the City of Coburg in this addendum. At their cores both scenarios
9 are generally consistent with the primary assumptions of the current
10 Urbanization Study. * * * All of the scenarios evaluated support the continued
11 need for a UGB expansion of at least 40 acres to as much as 195 acres based on
12 forecast need for large industrial sites within Coburg and the Central Lane
13 County region.”) Record 306. Therefore, petitioners argue, the decision is not
14 adequate for review.

15 Respondents answer that the city and intervenor submitted letters to
16 clarify the evidence in the record that supported the decision, and that those
17 letters were incorporated as findings. Those letters are at Record 757-782 and

determination of the need for a short-term supply of land for
employment uses consistent with 660-009-0025. *Employment land
need may be based on an estimate of job growth over the planning
period; local government must provide a reasonable justification
for the job growth estimate but Goal 14 does not require that job
growth estimates necessarily be proportional to population
growth. * * *.*” (Emphasis added.)

1 further clarify the role of the 2010 study and the 2014 update as supporting the
2 decision.

3 We consider the decision and its supporting documentation adequate for
4 review. It is not unusual for decision makers to be presented documents that
5 present a range of possible options. Here the number of acres identified as
6 needed varies, because those documents were prepared at different times and
7 are based on different data and different assumptions. The fact that the 2014
8 update modifies the 2010 analysis and results in new projected figures does not
9 make those documents “internally inconsistent.”

10 Nonetheless, petitioners also argue that “it is not possible to tell which
11 jobs forecasts and land needs were ultimately selected to form the basis of the
12 decision and why.” Petition for Review 41. Respondents have not identified
13 any part of the challenged decision that clearly and expressly selects between
14 the different employment projections presented by the 2010 Study, REA and
15 2014 Update or the different estimates of the number of acres required to meet
16 projected employment needs. However, intervenor submitted a letter to the
17 board of commissioners, which it adopted as findings. A portion of that letter
18 is set out below:

Coburg Industrial Scenarios with Regional Large Site Industrial Capture

Comparative Scenario / Option	Coburg Large Site Industrial Capture %			
	A	B1	B2	B3
Added Regional Market Capture Rate	0%	10%	20%	30%
Regional Large Site Acreage Demand	463	463	463	463
Net Coburg Regional Acreage Demand	-	46.3	92.5	138.8
Coburg Share Adjusted for 10% Vacancy	-	51.4	102.8	154.2
Plus Local Industrial Need (Forecast A)	68.7	68.7	68.7	68.7
Total Coburg Industrial Demand	68.7	120.1	171.5	222.9
Less Estimated Coburg Industrial Lands	(28.4)	(28.4)	(28.4)	(28.4)
Equals Net Added Acreage Need	40.3	91.7	143.1	194.5

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“Note that the table includes updated information regarding the City's local industrial land need and available industrial land within the City's existing UGB.

5

“The REA concluded:

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“A 10-20% capture of regional market demand appears to be a reasonable minimum expectation for Coburg. This base level of market capture is supported by the previous demonstrated attractiveness of this community for large scale regional industries, better proximity to Linn as well as Lane County labor force, current and prospective lack of Eugene sites in proximity to I-5, and UGB expansion/infrastructure challenges affecting the Springfield and Goshen (as well as Eugene) alternatives.’ Regional Economic Analysis, p. 24.” Record 773-74.

17

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Because respondents ultimately selected Area 8, with 106 acres, it is sufficiently clear that respondents determined the need for employment land was consistent with Options B1 and B2, and whatever assumptions and studies justified those figures.

21

This subassignment of error is denied.

1 **B. Failure to Use Current Job Numbers**

2 Petitioners next argue that respondents improperly used higher pre-
3 recession job numbers when applying the OAR 660-024-0040(9) safe harbor
4 option under the Goal 14 administrative rule. The REA Scenario A
5 employment forecast was developed based on the Oregon Employment
6 Department (OED) 1.66% average annual growth rate (AAGR) forecast for
7 Lane County, relying on OAR 660-024-0040(9)(a), which provides that:

8 “A local government may estimate that *the current number of jobs*
9 *in the urban area* will grow during the 20-year planning period at
10 a rate equal to * * * [t]he county or regional job growth rate
11 provided in the most recent forecast published by the Oregon
12 Employment Department[.]” (Emphasis added.)

13 Petitioners assert that respondents erred, because the REA correctly applied the
14 1.66% AAGR over a period of 20 years to result in a thirty-nine percent
15 increase in jobs, but then applied that percentage to the 2006 jobs estimate
16 (3,316 jobs) that existed at the height of the economic boom rather than the
17 2012 jobs estimate (1,207 jobs), the most recent job count available. Petitioners
18 argue that due to this error, respondents over-estimated the amount of the
19 projected jobs in the 20-year planning period by almost a factor of three.

20 Intervenor responds:

21 “* * * That safe harbor is prescribed for the first of the three Goal
22 9 employment land considerations * * *—a city’s population
23 based employment needs. The safe harbor does not apply to either
24 of the two other Goal 9 considerations—whether there are suitable
25 site types or regional employment opportunities. * * *”
26 Intervenor-Respondent’s Brief 36.

1 Intervenor also contends that in *Zimmerman* the Court of Appeals “addressed
2 this specific issue” and explained that local governments had discretion to
3 factor in economic booms and downturns in applying economic projections
4 when establishing an adequate factual basis for a UGB expansion. Intervenor
5 states that the REA’s economic trends and forecast analysis was based on the
6 most recent (at that time) and readily available employment data compiled by
7 OED, and compared it with the most recent information from Oregon Office of
8 Economic Analysis.

9 We agree with petitioners that respondents erred by failing to use “the
10 current number of jobs” as required by OAR 660-024-0040(9)(a). Since the
11 safe harbor was used in this case to generate the city’s population-based
12 employment needs, we do not understand intervenor’s first argument. And
13 *Zimmerman* is inapposite, as that case concerned whether allegedly stale data
14 constituted “best available * * * information” under OAR 660-009-0010(5).²³
15 Whether “the current number of jobs in the urban area” must be used in

²³ OAR 660-009-0010(5) provides:

“The effort necessary to comply with OAR 660-009-0015 through 660-009-0030 will vary depending upon the size of the jurisdiction, the detail of previous economic development planning efforts, and the extent of new information on national, state, regional, county, and local economic trends. A jurisdiction's planning effort is adequate if it uses the best available or readily collectable information to respond to the requirements of this division.”

1 applying the OAR 660-024-0040(9)(a) safe harbor provision was not an issue
2 in *Zimmerman*.

3 This sub-assignment is sustained.

4 **C. Error to Add Regional Large-Site Industry Capture to**
5 **Employment Based on Safe Harbor**

6 Petitioners next assert the REA improperly inflated the safe harbor jobs
7 estimate by assuming Coburg will attract regional employers, in the future, who
8 are seeking large industrial sites. Petitioners rely on *Friends of Yamhill County*
9 *v. City of Newberg*, 62 Or LUBA 5 (2010), stating that the safe harbor does not
10 allow the simultaneous use of other methods.

11 Intervenor clarifies that the REA recognizes that the Scenario A
12 projection is based on anticipated economic growth derived from expected
13 population growth and does not capture all types of economic growth that may
14 be occurring in the region. Intervenor notes that the Scenario B regional
15 analysis is performed to accommodate larger regional industrial facilities that
16 have flexibility to locate anywhere in the region and beyond and have
17 particular siting requirements. Intervenor argues:

18 “* * * Importantly, neither Goal 14 nor Goal 9 state that if the safe
19 harbor is used for the population based component of the Goal 9
20 analysis, that it precludes further application of the remaining
21 Goal 9 rule provisions that mandate a sufficient supply of
22 adequate sites by type and that encourage local governments to
23 pursue regional economic opportunities. * * *” Intervenor-
24 Respondent’s Brief 36.

1 We agree with intervenor that the OAR 660-024-0040(9)(a) safe harbor
2 does not preclude taking into account additional demand for employment land
3 that may be generated by regional forces that may have little or nothing to do
4 with the city’s population growth. As intervenor argues, the Goal 9 rule, OAR
5 660-009-0015 (1) and (2) expressly permit such considerations.²⁴

²⁴ OAR 660-009-0015(1) and (2) provide:

“(1) Review of National, State, Regional, County and Local Trends. The economic opportunities analysis must identify the major categories of industrial or other employment uses that could reasonably be expected to locate or expand in the planning area based on information about national, state, regional, county or local trends. This review of trends is the principal basis for estimating future industrial and other employment uses as described in section (4) of this rule. A use or category of use could reasonably be expected to expand or locate in the planning area if the area possesses the appropriate locational factors for the use or category of use. Cities and counties are strongly encouraged to analyze trends and establish employment projections in a geographic area larger than the planning area and to determine the percentage of employment growth reasonably expected to be captured for the planning area based on the assessment of community economic development potential pursuant to section (4) of this rule.

“(2) Identification of Required Site Types. The economic opportunities analysis must identify the number of sites by type reasonably expected to be needed to accommodate the expected employment growth based on the site characteristics typical of expected uses. Cities and counties are encouraged to examine existing firms in the planning area to identify the types of sites that may be needed for

1 Petitioners’ reliance on *Friends of Yamhill County* is misplaced. LUBA
2 simply concluded in *Friends of Yamhill County* that “the Oregon Employment
3 Department job growth projection rate authorized by OAR 660-024-
4 0040(9)(a)(A) and the coordinated population forecast projection rate
5 authorized by OAR 660-024-0040(9)(a)(B) are mutually exclusive
6 alternatives.” 62 Or LUBA at 30. We concluded the city could not switch
7 back and forth between those methodologies for different industries. *Id.* at 30-
8 31. That is not what occurred here. We agree with intervenor on this point, and
9 also agree that *Friends of Yamhill County* does not support the proposition that
10 a government cannot use both the safe harbor provision to project the city’s
11 population growth based employment land needs and seek to capture additional
12 regional employment opportunities by allocating land to capture such regional
13 employment growth.

14 This subassignment of error is denied.

15 **D. Double Counting Job Numbers for Large Lot Industrial**

16 Petitioners also argue that the use of both the projected local
17 employment needs (Scenario A) in addition to regional needs (Scenario B)
18 double counts those large lot industrial jobs because large lot industrial jobs are
19 already a subset of Scenario A.

20 Intervenor-Respondent responds:

expansion. Industrial or other employment uses with compatible site characteristics may be grouped together into common site categories.”

1 “Turning to Petitioners’ arguments here, the City’s original
2 demonstrated need for one or two 20-plus acre sites is a population
3 based industrial land need for target industrial uses that have
4 certain parcel size requirements. Its purpose is to replace the land
5 lost to local businesses use of those site types and to provide
6 similar types of sites to meet future local needs. However, REA is
7 looking at additional large site employers that might otherwise
8 locate somewhere else on the west coast but may locate in Coburg
9 if the conditions are right. In that respect, the regional opportunity
10 does not draw from the normal population growth within the cities
11 of Coburg, or even Eugene or Springfield. The regional need does
12 not already include the normal need for similar types of uses that
13 are based on population or employment projections as Petitioners’
14 arguments contend; regional need is in addition to the local need.
15 Thus the number of jobs that may be created by a regional
16 opportunity are not already included in the initial EOA analysis –
17 there is no double counting.” Intervenor-Respondent’s Brief 40.²⁵

18 We are not sure we fully understand either petitioners’ or intervenor’s
19 arguments on this point. Petitioners have the burden of demonstrating error.
20 We conclude petitioners have failed to demonstrate that respondents
21 improperly double-counted large-lot industrial jobs.

22 This subassignment of error is denied.

23 **E. Failure to Consider Rezoning Surplus Commercial Land**
24 **Already Inside the UGB**

25 Petitioners’ next subassignment of error is seven lines long, but bolstered
26 by additional arguments in a footnote. We reject the footnote arguments as
27 insufficiently developed to merit review. Petitioners’ complaint appears to be

²⁵ Intervenor also points out that petitioners misread REA’s Scenario B1 to assume Coburg “will capture 463 large-lot jobs,” whereas the REA actually indicates a regional need for 463 acres.

1 that respondents did not adequately consider rezoning surplus commercially
2 designated lands to meet the identified need for employment lands.

3 Intervenor states that the 2010 Study concluded that the available
4 employment land inside the UGB will most likely be developed for smaller
5 businesses and would not be available for large lot industrial development.
6 Intervenor also argues the incorporated findings of the 2014 Update at Record
7 761-762 explain highway commercial lots identified by petitioners in the
8 proceeding totals only 22.5 acres and are insufficient to meet the need of a
9 minimum single 20 net buildable acre industrial site.

10 We conclude that petitioners have not established that respondents failed
11 to adequately consider rezoning existing commercially designated land to meet
12 some of the identified future need for employment land.

13 **F. Failure to Account for Existing Regional Large Lot Supply**

14 Petitioners finally argue that the challenged decision improperly ignores
15 that there are other communities in Lane County that can accommodate large
16 lot industrial sites, and that the findings fail to address this information and do
17 not explain how there can be an unmet regional need for 463 acres of large lot
18 industrial land when nearly that amount already exists within Lane County.

19 “[T]he record contains detailed evidence documenting that there
20 are already at least 450 acres of 20+ acre industrial sites presently
21 available in Lane County: a) 181 acres currently for sale in Eugene
22 and Creswell; b) 62 acres in Springfield; and c) 214 acres in
23 Goshen, most of it already served by I-5 and rail.” Petition for
24 Review 48 (original emphasis omitted).

1 Intervenor contends that petitioners rely on an isolated table in the REA
2 and do not consider what follows. According to intervenor, the REA shows
3 that the City of Springfield has a deficit of 450 acres for large lot industrial
4 development, not 62 available acres. Intervenor contends the REA shows that
5 Eugene has determined it needs to expand its UGB to add 457 acres to meet its
6 needs and that the 181 acres petitioners identify are already needed to meet
7 Eugene’s needs. Finally, intervenor contends that the evidence petitioners rely
8 on to establish that that 214 acres of land is available in Goshen for large lot
9 employment development shows those acres are already developed.

10 We agree with intervenor that petitioners have not established that
11 respondents failed to adequately consider existing available land to meet
12 regional land for large lot employment land needs.

13 This subassignment of error is denied.

14 **FOURTH ASSIGNMENT OF ERROR**

15 ORS 197.732, Goal 2, Part II; and OAR Chapter 660, Division 4 all
16 authorize local governments to take “exceptions” to the statewide planning
17 goals. As defined by OAR 660-004-0005(1),

18 “An ‘Exception’ is a comprehensive plan provision, including an
19 amendment to an acknowledged comprehensive plan, that:

20 “(a) Is applicable to specific properties or situations and does not
21 establish a planning or zoning policy of general
22 applicability;

23 “(b) Does not comply with some or all goal requirements
24 applicable to the subject properties or situations; and

1 “(c) Complies with ORS 197.732(2), the provisions of this
2 division and, if applicable, the provisions of OAR 660-011-
3 0060, 660-012-0070, 660-014-0030 or 660-014-0040.”

4 Citing language in the decision that can be read to suggest respondents
5 attempted to take an exception to the ORS 197.298(1) priority scheme,
6 petitioners contend that while the exception process is a permissible vehicle for
7 attempting to avoid statewide planning goal requirements, there is simply no
8 authority for taking an exception to a statutory requirement, such as the ORS
9 197.298(1) priority requirement.

10 We understand respondents to take the position respondents were not
11 attempting to approve an exception to ORS 197.298, or any particular
12 statewide planning goal or administrative rule, but rather were simply
13 attempting to respond to the Court of Appeals decision in *McMinnville* “that
14 says clearly that there must be an exceptions analysis as a part of the UGB
15 expansion process.” Respondents’ Brief 68. Intervenor-Respondent takes a
16 different approach and argues that because the version of Goal 14 that applied
17 in this case required that respondents evaluate “alternative boundary locations
18 consistent with ORS 197.298,” it was entirely appropriate for respondents to
19 attempt to approve an exception.

20 The old version of Goal 14 that applied in *McMinnville* provided “a
21 governing body proposing [a] change in the boundary separating urbanizable
22 lands from rural land, shall follow the procedures and requirements as set forth
23 in the Land Use Planning goal (Goal 2) for goal exceptions.” That requirement

1 complicated an already complicated process, and the version of Goal 14 that
2 applies in this case does not include that language or requirement. We agree
3 with respondents that it does not appear that respondents were attempting to
4 approve an exception to ORS 197.298, or any particular goal or rule, but rather
5 mistakenly believed they were required to follow exception procedures and
6 requirements under Goal 14, as analyzed in *McMinnville*.

7 We reject intervenor's contention that because the applicable version of
8 Goal 14 states an UGB amendment must be consistent with the priority scheme
9 set out in ORS 197.298, the statute thereby becomes eligible for an exception.
10 A local government may not approve an exception to a statute. Because we
11 conclude respondents did not take an exception to the ORS 197.298 priority
12 scheme, which is the premise of petitioners' fourth assignment of error, the
13 fourth assignment of error is denied.

14 **CONCLUSION**

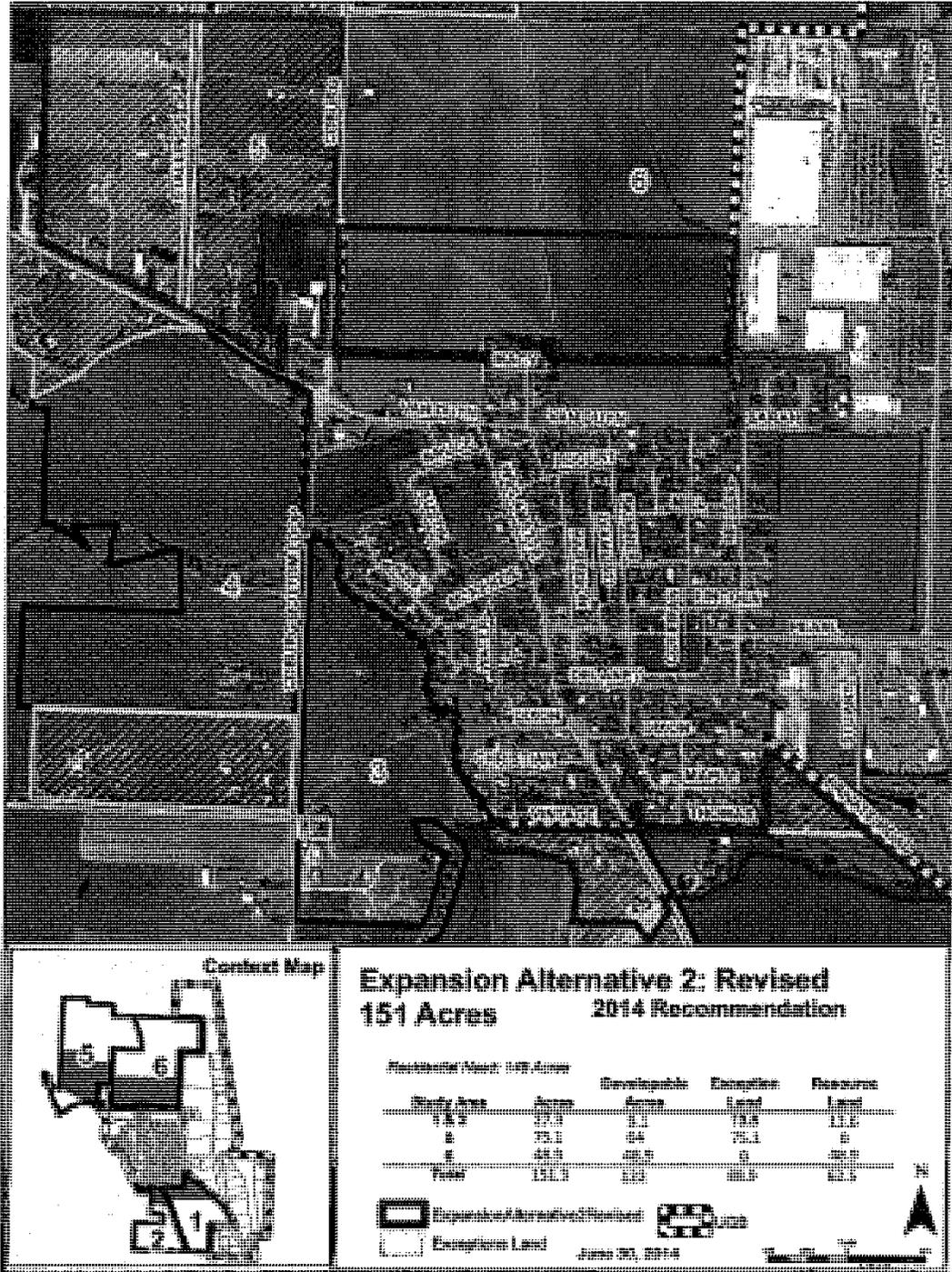
15 Our resolution of petitioners' assignments of error requires that we
16 remand Ordinance 1315, which among other things amends the UGB. Because
17 we reject petitioners' challenges under Goal 9 to the TSP, it is less clear
18 whether Ordinance 1314, which adopts amendments to the TSP, must also be
19 remanded. But it is undisputed that, the east-west bypass could not be
20 constructed across rural agricultural land, and therefore depends on the UGB
21 amendment to include the lower part of Area 6. And as noted earlier, the
22 claimed need for the east-west bypass was one of the reasons respondents gave

1 for including the lower part of Area 6 in the UGB. Given that interdependence
2 of the two ordinances, remand of both ordinances is required.

3 Ordinances 1314 and 1315 are remanded.

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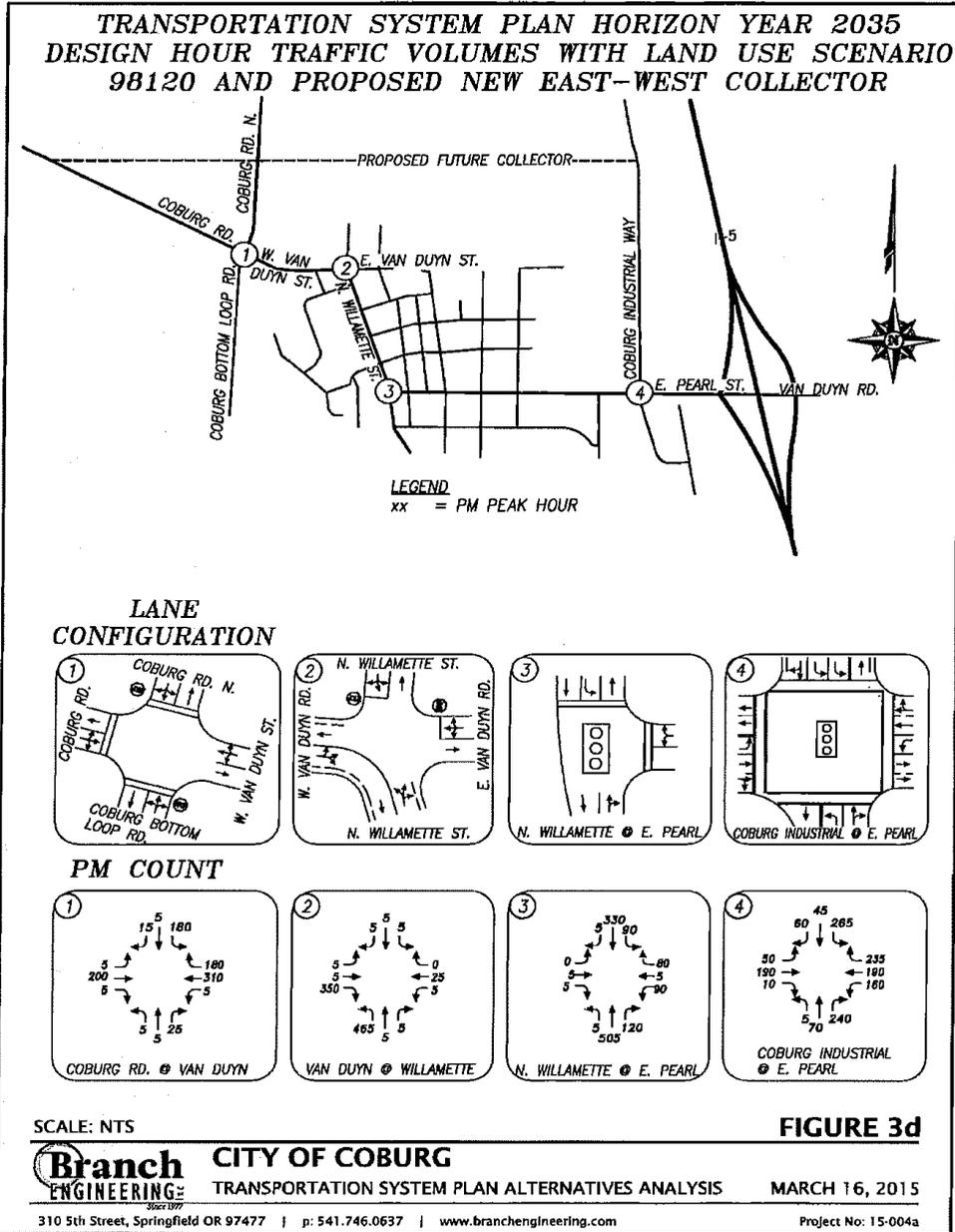
Appendix 2



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Appendix 3



Z:\2015\15-004a Coburg TSP Traffic Study\15-004a TRAFFIC FIGURES.dwg FIG 3d 3/17/2015 11:50 AM DARR 18.0a (LMS Tech)

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