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**AGENDA ITEM SUMMARY**

**Meeting Date:** 7/21/2014  
**Meeting Type:** Work Session  
**Staff Contact/Dept.:** Linda Pauly/ Len Goodwin/DPW  
**Staff Phone No:** (541)726-4608  
**Estimated Time:** 60 minutes  
**Council Goals:** Mandate

**SPRINGFIELD  
CITY COUNCIL**

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**ITEM TITLE:** SPRINGFIELD 2030 URBAN GROWTH BOUNDARY (UGB) AMENDMENT TO MEET THE CITY'S COMMERCIAL AND INDUSTRIAL LAND NEEDS (METRO PLAN AMENDMENT FILE NO. LRP 2009-00014)

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**ACTION REQUESTED:** Council is requested to review and discuss refinements to two UGB study area (ATT 2) based on Council's direction at the May 27 work session, and to reach consensus on including these areas in the City's UGB proposal.

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**ISSUE STATEMENT:** The City Council is considering options for expanding the UGB to provide sites that will meet the needs of Springfield's target industries — as identified in the 2009 Draft Commercial and Industrial Buildable Lands Inventory and Economic Opportunity Analysis — for the planning period ending 2030. The City Council's 2030 Plan UGB proposal and the final UGB may include some or all land as shown in ATT 2 or other lands identified through the 2030 Plan process, consistent with the prioritization requirements of ORS 197.298 and the Oregon Land Use Goal 14 Administrative Rule.

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**ATTACHMENTS:**

1. Council Briefing Memo
2. Map: UGB Expansion Proposal for North Gateway & College View Industrial Study Areas
3. Memorandum from Environmental Services: Water Quality Issues Response
4. Memorandum from City Attorney
5. Correspondence received May 27th to July 11th

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**DISCUSSION/  
FINANCIAL  
IMPACT:** Since April, the Council has reviewed and discussed analysis provided by staff to compare economic, environmental, social, and energy aspects of five study areas for potential inclusion in Springfield's UGB. These discussions have been focused on deciding *where* the City will grow to provide urbanizable sites for employment opportunities and target industries. The product of these discussions will be the Council's consensus on which study areas to include in the City's UGB proposal and which areas to exclude — consistent with the prioritization requirements of ORS 197.298. At the May 27<sup>th</sup> work session, Council directed staff to refine the proposed UGB to include portions of the College View Industrial and North Gateway study areas. The results of this analysis are mapped in ATT2.

Selecting the *location* of future urban growth areas is just one of several key decisions the elected officials will be asked to make concurrently as they consider adoption of Springfield 2030 Plan and UGB Amendment. The Council also directed staff to conduct additional analysis focusing on *how many employment opportunity sites* and *how much* urbanizable land to include in the UGB to provide suitable sites for target industry sectors. This analysis requires updating and adding data about site needs to the 2009 Draft Commercial and Industrial Buildable Lands Inventory and Economic Opportunity Analysis (CIBL/EOA) to finalize the document for adoption. The final local decision on the location and size of UGB amendment requires co-adoption by the Springfield City Council and Lane County Board of Commissioners. The City's 2030 Plan proposal will be presented to the public and to the Lane County Board of Commissioners for review later this calendar year.

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**Date:** 7/21/2014  
**To:** Gino Grimaldi, City Manager  
**From:** Len Goodwin, DPW Director  
Linda Pauly, Principal Planner  
**Subject:** 2030 Plan UGB Expansion Proposal

**COUNCIL  
BRIEFING  
MEMORANDUM**

**ISSUE:** The City Council is considering options for expanding the UGB to provide sites (larger than 5 acres) suitable to meet the needs of target industries — as identified in the 2009 Draft Commercial and Industrial Buildable Lands Inventory and Economic Opportunity Analysis — over the planning period ending 2030. The City Council’s 2030 Plan UGB proposal and the final UGB may include some or all land as shown in ATT 2 or other lands identified through the 2030 Plan process, consistent with the prioritization requirements of ORS 197.298 and the Oregon Land Use Goal 14 Administrative Rule.

**COUNCIL GOALS/**

**MANDATE:**

Council Goals: Mandate

Oregon Law requires cities to maintain 20-year land supplies for jobs and housing. Springfield has identified a deficit of commercial and industrial lands and is in the process of preparing the 2030 Comprehensive Plan Economic Element and Urbanization Element to address this category of land need — through adoption of plan policies to support diversification and growth of the economy, including a UGB amendment to add buildable land.

**DISCUSSION:**

At the May 27<sup>th</sup> work session, Council directed staff to narrow the focus of the UGB study by preparing a UGB expansion proposal that includes portions of the College View Industrial and North Gateway study areas. The results of this analysis are mapped in ATT2 and are summarized below. This memo explains (1) how the proposal has changed to reflect Council’s direction; and (2) and how many buildable “Employment Opportunity Sites” of different site sizes — ranging from 5 acres to greater than 50 acres — and the total number of buildable acres that could be added to the UGB within these two study areas. This information will assist the Council as they decide *where* the City will grow and inform the final analysis of *how much* land will be included in the proposed expansion.

**Proposed North Gateway UGB Expansion (Draft) ATT2 Exhibit A**

Based on council’s input, staff prepared a draft map of the parcels of land in the North Gateway Study Area to be included in Springfield’s UGB expansion proposal:

- Lands where property owners have expressed interest: Wicklund, Puzzle Parts LLC and Johnson properties. The EWEB property that contains an electrical transmission facility and Rainbow Water District wells is included pending continued discussion with EWEB and would be designated and zoned Public Land. The Wicklund, Puzzle Parts LLC and Johnson sites are ORS 197.298 Priority 4 Exclusive Farm Use (EFU).
- For practical land management reasons as well as mapping considerations and current uncertainty about FEMA flood map updates, the floodway-constrained portions of Wicklund, Puzzle Parts LLC and Johnson properties are proposed to be included within the UGB, but to retain their existing Metro Plan Agriculture designation with further consideration of Open Space or Natural Resource plan and zoning designations. Floodway is identified as an absolute development constraint in this analysis and

floodway acres are not counted in the yield of buildable sites in the results below.

#### Employment Opportunity Sites Created - North Gateway UGB Expansion

Adoption of this proposal would add **two large 50-acre sites** to Springfield's UGB. The two sites (Wicklund and Puzzle Parts LLC) are contiguous and **could be combined to create one 100-acre site**. Both sites are contiguous with the existing UGB and Springfield City Limits. The proposal would also add **one 20-acre site** that is not contiguous with the City Limits.

#### Total Acres included in proposed North Gateway UGB Expansion

Buildable/unconstrained land **124.4 acres 3 sites**

Total UGB expansion area **212.7 acres** (including right-of-way, EWEB property and constrained acres)

#### **Proposed College View Industrial Study Area UGB expansion (Draft)**

Based on Council's input and further analysis, staff prepared a draft map of the parcels of land in the College View Industrial Study Area to be included in Springfield's UGB expansion proposal:

- Lands where property owners have expressed interest: Straub Trust (35.9 buildable acres), Oak Management (14.8 buildable acres), Johnson Crushers (8.8 buildable acres); Walsh Trucking (9.7 buildable acres), and Scates (3.6 buildable acres). Walsh and Scates properties are ORS 197.298 Priority 2 lands. Straub Trust, Oak Management and Johnson Crushers lands are ORS 197.298 Priority 4 Exclusive Farm Use (EFU).
- ORS 197.298 Priority 2 lands in the study area are included as shown in ATT 2. These lands are currently planned and zoned for rural uses in the Lane Rural Comprehensive Plan and are subject to Lane Code development standards. Most of these properties have existing development. Given parcelization, existing uses, and constrained site configuration of these tax lots (e.g. the narrow strip between I-5 and the railroad) only individual tax lots or assembled groups of abutting taxlots) larger than 5 acres are likely to provide buildable sites to meet the land needs identified in Springfield's 2009 Draft CIBL/EOA. The proposed UGB includes 8 one-owner sites 5-10 acres in size: Walsh (9.7 acres), Chenowith (5.6 acres), Haines (5 acres), Sunset Investments (6.2), Brooks (9.2 acres), Minton (6.9 acres), Jorgensen (7.6 acres), Bird (6.5 acres). Proximate location of these abutting sites would support parcel assembly by a developer to create larger sites. The proposal also includes numerous tax lots smaller than 5 acres that are unlikely to be combined into larger development sites due to their narrow width between rights-of-way for Interstate 5, the railroad and Franklin Boulevard. If this area is selected by Council for inclusion, staff will prepare plan designation and Springfield zoning proposals for each tax lot included.
- Other 197.298 Priority 4 (EFU) lands are included: Buster 5-acre site.
- The EPUD property is included pending continued discussion with EPUD and would be designated and zoned Public Land.
- The narrow floodway portion of Straub and Oak Management properties along their eastern property line is proposed to be included in the UGB, but to retain its existing Metro Plan Agriculture designation with further consideration of Open Space plan and zoning designations. Floodway is identified as an absolute development constraint in this analysis and floodway acres are not counted in the yield of buildable sites in the results below.

- Land between the southern tip of the Glenwood refinement plan area along Franklin Boulevard to link the Opportunity Sites to the existing UGB and Springfield's City Limits via the Franklin corridor.

Based on Council's input and further analysis, staff removed the following areas from the proposed UGB:

- Study areas on the north and south side of Seavey Loop Road have been removed from the proposal to reduce impacts on Class 2 high value agricultural soils and to buffer the the farms, natural resource and parkland areas located along and accessed via Seavey Loop Road. The proposed draft UGB provides a buffer of farmland along the south side of Seavey Loop Road and the boundary has been drawn to exclude the majority of floodplain and Class 2 soils. The buffer between Seavey Loop to the proposed UGB boundary ranges from 680' at the Johnson Crushers property to a depth of 1550' at the the Lumsden property.
- The vacant land south of Twin Buttes Road has been excluded. Staff conducted additional analysis and received input from Bonneville Power Administration (BPA) and concludes that practical development of singular tax lots or assembled parcel groupings is unlikely due to combined constraints of slopes, BPA high voltage lines and highly restricted BPA rights of way.

#### Employment Opportunity Sites Created - College View Industrial UGB Expansion

Adoption of this proposal would add **one 50-acre** site to Springfield's UGB, made up of the Straub Trust and Oak Management (one family) properties. The site could also be combined with abutting properties through parcel assembly to create a site larger than 100 acres. **Eight 5-10 acre sites** would be added. The 5-10 acre sites could be combined to create larger sites. Sites are not contiguous with the existing UGB and Springfield City Limits. The proposal also includes other lands with existing development.

#### Total Acres included in proposed College View Industrial UGB Expansion

Buildable/Unconstrained **196.1 acres** (includes developed land)

Total UGB expansion area **249.2 acres** (including right-of-way, EPUD property, developed land, and constrained acres)

#### Total Acres Included in Proposed UGB Expansion 5-27-14 (Draft)

<b>Study Area</b>	<b>Total Unconstrained Acres Included</b>	<b>Total Gross Acres Included</b>
North Gateway	<b>124.4</b>	<b>212.7</b>
College View Industrial	<b>196.1</b>	<b>249.2</b>
<b>Total Land Added</b>	<b>320.5</b>	<b>461.9</b>

May 27, 2014 Draft UGB Proposal vs. 2009 Draft CIBL/EOA Land Need

**Employment Site Needs (see CIBL Table 5-4, 59)**

<b>Number of Sites Needed</b>				
	<b>Less than 5 acres</b>	<b>5 to 20 acres</b>	<b>20 to 50 acres</b>	<b>Greater than 50 acres</b>
Industrial	none	none	3	3
Commercial and Mixed Use	none	10	1	none
<b>Total sites needed</b>	<b>none</b>	<b>10</b>	<b>4</b>	<b>3</b>
<b>Sites added in proposed draft UGB 5-27-14</b>				
North Gateway Sites	0	0	1	2
College View Sites	50 tax lots (developed)	(8) 5 acre sites*	*	1
<b>Total buildable sites to be added</b>		<b>8</b>	<b>1 (with potential for 3 with parcel assembly)</b>	<b>3</b>

\* = potential for parcel assembly to create two 20 acre sites

\* NOTE: This table does not include the SUB and Willamalane public land, parks, and open space UGB expansion areas (Total 373 acres).

Options for Meeting Balance of Large Site Land Need

- **North Springfield Highway Study Area - Weyerhaeuser Property:** On July 10, staff spoke with Tally Patton, Land Use Manager at Weyerhaeuser regarding their interest in having their site included in the UGB. Ms. Patton stated that Weyerhaeuser's position is neutral/leaning against being included. She mentioned that the site is leased for farming (cattle and vegetables) and they are in discussion with McKenzie River Trust about the property.
- **Mill Race South 28<sup>th</sup> Study Area: SUB property (formerly Knife River)** SUB is interested in designating the 57-acre former Knife River site for Employment. Site could be combined with adjacent land inside (Dixon 23 acres) or outside the UGB (Johnson 20.5 acres) and other smaller parcels total 43 acres) to create a larger employment center.
- **Mahogany Lane /South of Jasper Road Study Area** large sites
- Options for redesignation/rezoning of larger sites within the existing UGB include:
  - (1) Jasper-Natron Redesignation of SHI (Milland) and LDR (Webb) sites
  - (2) Glenwood Transfer Station site

**BACKGROUND:** This work session provides Council with the requested information to inform their discussion of a potential expansion of the Urban Growth Boundary (UGB). This UGB expansion will consist of commercial and industrial land to address the needs identified in the Commercial Industrial Buildable Lands (CIBL) Study and will also include publicly-owned land to be designated and zoned for parks, open space and public facilities.

History

In previous work sessions, staff presented data analyzing all of the land around the current UGB and identified 10 possible areas where expansion might occur. Through an extensive process conducted between 2009—2013, those 10 study areas were reduced to the five that continue to be under consideration. In 2011, the City and County co-adopted a parcel specific Springfield UGB and adopted the residential element of the 2030 Plan.

In July 2013, Council reviewed these five areas for employment expansion. Council directed staff to prepare more detailed information on the ability to serve each of the five areas, the approximate costs of those services, positive and negative characteristics of expansion of the UGB into each of the areas, and the public input received during the course of staff's public outreach efforts.

- At the April 28<sup>th</sup> work session the Council received information to identify infrastructure that will likely be required to serve the study areas and to compare the probable costs of providing urban levels of service to the five study areas. Council directed staff to provide more information to inform Council's discussion, including but not limited to: CIBL/EOA policy choices; location and size of redevelopment areas in the existing UGB; feasibility and cost of phasing service extensions to expansion areas or portions thereof; and economic development considerations.
- At the May 5<sup>th</sup> work session the Council reviewed the *Results of Stakeholder Outreach* and directed staff to provide more information about flood plain development and agricultural uses.
- At the May 12<sup>th</sup> work session, Council received information about cost to serve smaller portions of the study areas and infrastructure financing mechanisms. Council directed staff to bring back information on redevelopable parcels inside the UGB, parcels that could be redesignated, and look at the potential for a smaller expansion.
- At the May 27<sup>th</sup> work session, the Council reviewed the data previously provided by staff and discussed the merits of the different study areas.

## **NEXT STEPS**

Together with the UGB amendment, the elected officials must concurrently adopt an extensive assembly of policy documents including:

- Springfield's 2030 Plan Economic and Urbanization Element comprehensive plan policies. Council has already reviewed the Draft Economic Element. These policy elements will replace Metro Plan policies applicable to Springfield.
- Plan designations and zoning for each parcel of land added to the UGB
- Implementing amendments to the Springfield Development Code
- Legislative findings to support the decisions
- Parcel-specific description of the new boundary
- Council Work Sessions — if requested — to discuss options for meeting the City's commercial and industrial land needs.

A public hearing on this matter will be scheduled after Springfield completes the 2030 Plan Economic Element and Urbanization Element comprehensive plan policy development and plan implementation work associated with this process, including plan policies, land use designations and zoning assigned to all land added to the Springfield UGB. The Oregon Land Conservation and Development Commission (LCDC) is the decision maker on UGB amendments greater than 50 acres.

### Remaining Work Tasks and Timelines

August-September	<ul style="list-style-type: none"> <li>• Prepare plan designations and zoning for each parcel of land added to the UGB</li> <li>• Prepare Metro Plan diagram and text amendments to add the interim Urban Holding Area – Employment plan designation</li> <li>• Prepare 2030 Plan Urbanization Element including annexation policies and development procedures applicable to the “newly urbanizable lands” added to the UGB</li> <li>• Prepare Springfield Development Code amendments to create new interim zoning district(s) to be applied to the “newly urbanizable lands” added to the UGB to replace existing County EFU, Rural Residential, Rural Industrial, Rural Commercial etc. zoning)</li> <li>• Conduct open house(s), stakeholder outreach</li> <li>• Conduct analysis and stakeholder outreach requested by Council, including: review CIBL/EOA policy choices; review location and size of redevelopment areas in existing UGB; economic development considerations.</li> </ul>
September-October	<ul style="list-style-type: none"> <li>• Finalize 2030 Plan Economic Element and CIBL</li> <li>• Finalize parcel-specific UGB map; Prepare legal description of new boundary</li> <li>• Prepare Metro Plan diagram and text amendments, staff report and findings</li> <li>• Planning Commission Work Session 2030 Plan Update</li> </ul>
November	<ul style="list-style-type: none"> <li>• Joint Planning Commission Public Hearing – Development Code Amendments, Urban Holding Area – Employment plan designation</li> </ul>
December	<ul style="list-style-type: none"> <li>• Joint Public Hearing City Council and Lane County Board 2030 Plan and UGB Amendment</li> </ul>

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**RECOMMENDED ACTION:** Council is asked to reach consensus on including/not including the areas shown in ATT2 in the City’s UGB proposal and to direct staff to: prepare the necessary policy documents (including finalizing the 2030 Economic Element and 2009 Draft CIBL/EOA land need analysis); 2030 Urbanization Element, UGB Map and Technical Supplement; Metro Plan text and diagram amendments; zoning amendments; Springfield Development Code amendments; ordinances and findings for adoption.

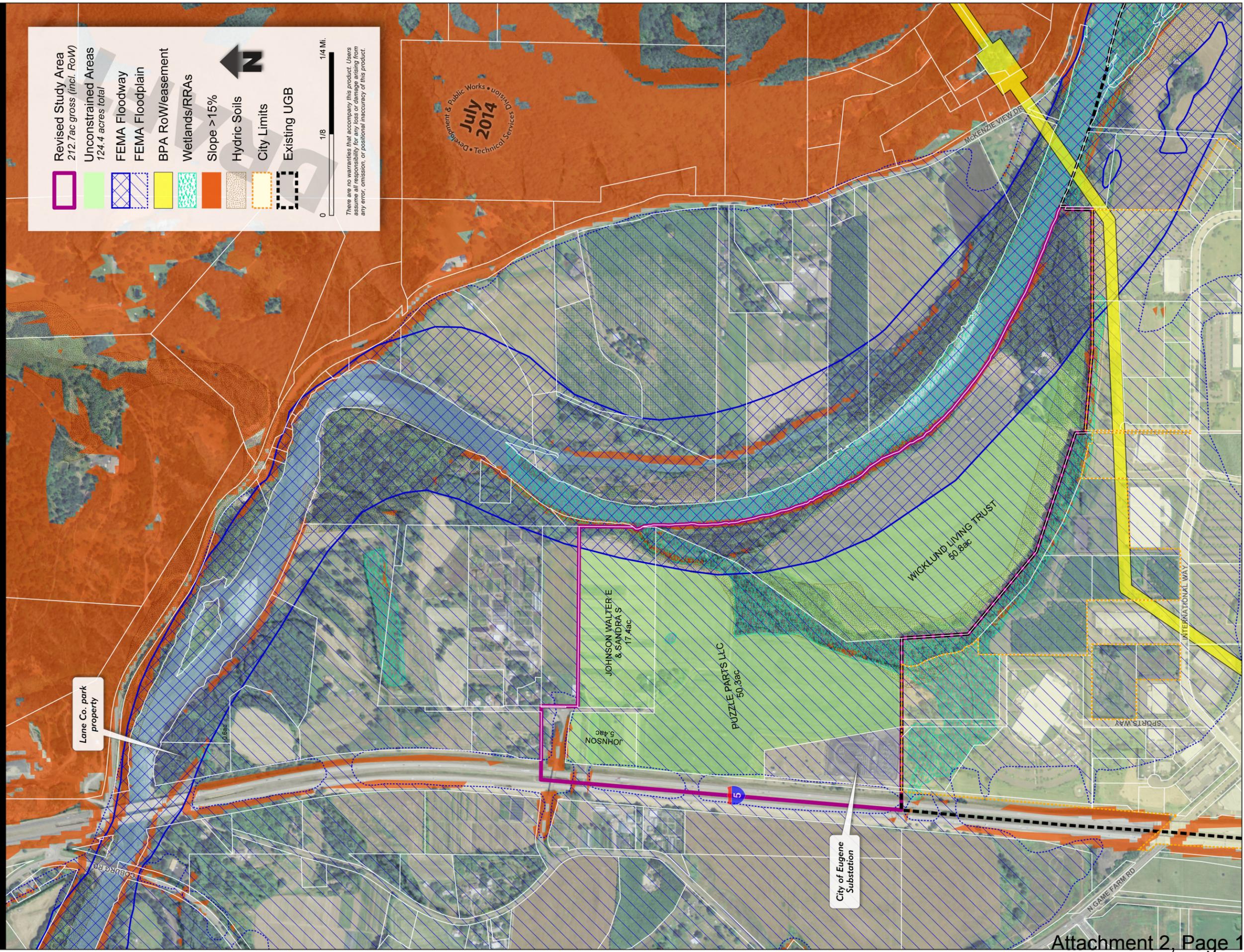
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**SPRINGFIELD 2030 REFINEMENT PLAN: Proposed UGB Expansion Area - North Gateway**



**Revised Study Area**  
 212.7 ac gross (incl. RoW)  
**Unconstrained Areas**  
 124.4 acres total  
 FEMA Floodway  
 FEMA Floodplain  
 BPA RoW/easement  
 Wetlands/RRAs  
 Slope > 15%  
 Hydric Soils  
 City Limits  
 Existing UGB

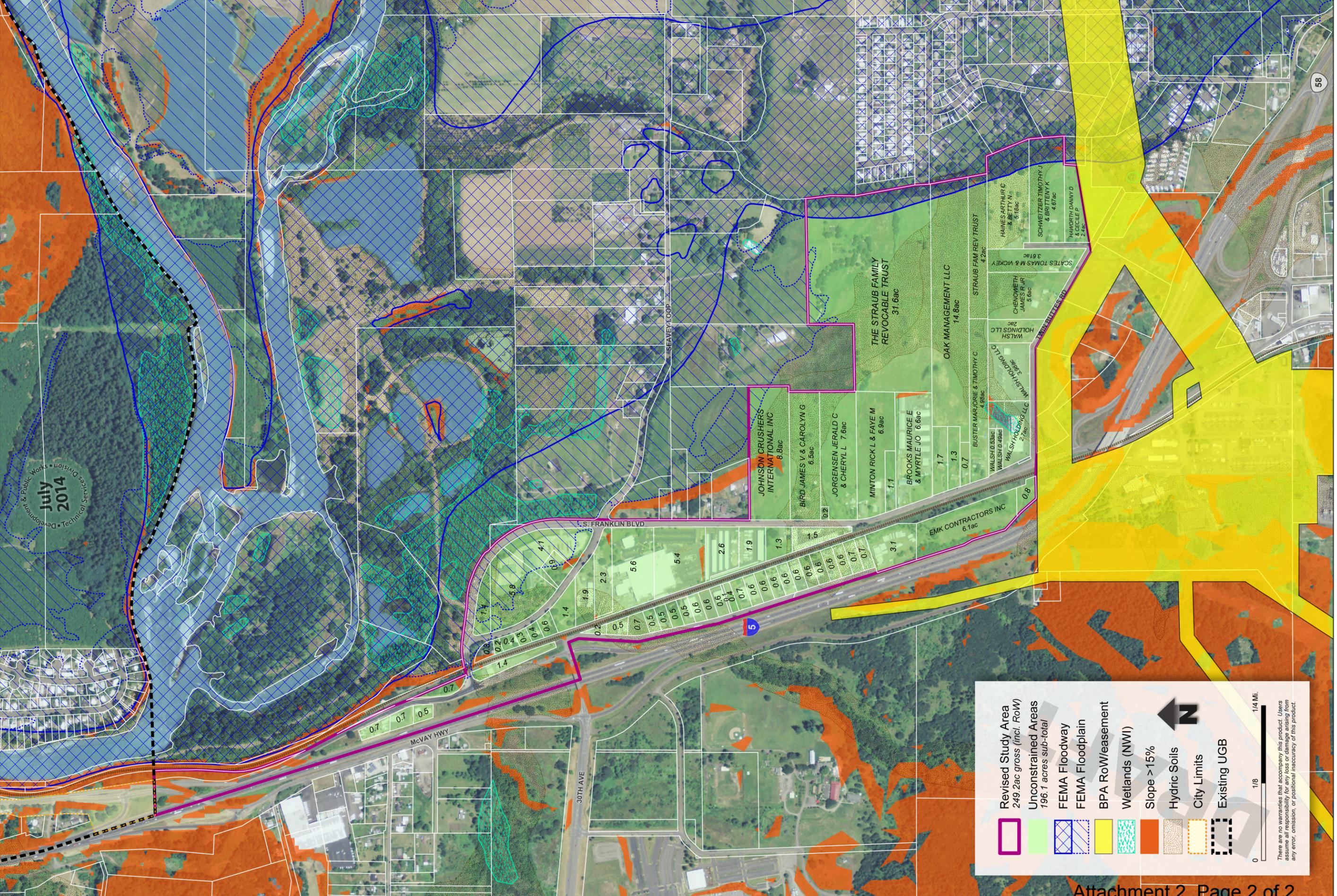
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 There are no warranties that accompany this product. Users are advised to verify the accuracy of this product for any error, omission, or positional inaccuracy of this product.



July 2014  
 Development & Public Works • UGB/D  
 Technical Services



# SPRINGFIELD 2030 REFINEMENT PLAN: Proposed UGB Expansion Areas - College View Industrial



July 2014  
Development & Public Works  
Technical Services Division

**Revised Study Area**  
249.2ac gross (incl. RoW)

**Unconstrained Areas**  
196.1 acres sub-total

**FEMA Floodway**

**FEMA Floodplain**

**BPA RoW/leasement**

**Wetlands (NWI)**

**Slope > 15%**

**Hydric Soils**

**City Limits**

**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.

58

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DATE: July 10, 2014

TO: Len Goodwin, Development and Public Works Director

FROM: Bill Hamann, Water Quality Programs Manager

SUBJECT: **2030 Plan UGB Expansion Study: ESD Water Quality Issue Response**

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The City's Environmental Services staff has completed a review of the City's ability to provide NPDES required stormwater and pretreatment services to each of the five potential Urban Growth Boundary Expansion Areas. The results of this review are summarized below:

For purposes of this discussion we are considering the following expansion areas: Southern portion of N Gateway study area, College View Industrial study area, N. Springfield Hwy/N. 52<sup>nd</sup> study area and also public land in the Mill Race study area.

Impacts to the City's Environmental Services Water Resources and Pretreatment Program work groups are being considered under two distinct scenarios; (1) if the UGB is expanded to encompass the above mentioned areas and the land is not annexed, (2) if some or all of the lands are actually annexed.

Note that the City is currently party to an IGA with Lane County to maintain mandated stormwater services for the County. As with the City of Springfield, the County is subject to National Pollutant Discharge Elimination System (NPDES) Phase II permit regulations for Municipal Separate Storm Sewer Systems (MS4) and must maintain the same state permit required stormwater activities as are listed in the City's own NPDES Stormwater Permit. The area affected by this IGA included the area between the City limits of Springfield and Springfield's UGB (the Urban Transition Zone – UTZ). At this time the City is receiving \$25000 annually from the county for specific services related to their required permit activities in the UTZ.

In considering scenario (1) above, the City would perform the same services as are listed in the current IGA; however the area and time commitment would be expanded. At this time these services include:

1. Outreach: Partner with County of Outreach efforts with Regional Partners, i.e. P2C, ACWA, Special Ops. Seeking opportunities to partner with the County to support local organizations with stormwater related outreach programs.

2. Education: Partner with County to provide stormwater education school workshops and presentations to students on the sources and impacts of stormwater pollution. Partner with county regarding stormwater educational brochures.
3. Public Involvement/Participation: Partner with county to provide opportunities for public involvement and participation, i.e. open houses, commission meetings, etc.
4. Illicit discharge: Partner with the County to develop and implement an illicit discharges reporting hotline and tracking system, assist in administrative support of regulations for illicit discharge response and enforcement, assist in sampling and testing in regards to water quality testing for illicit discharge detection and enforcement. Administer and enforce County adopted regulations as they pertain to illicit discharge response and enforcement.
5. Outfall Inventory and Mapping: Partner with the County to inventory and map outfalls to Waters of the State to develop a GIS map database of outfalls to be used for detection and elimination of illicit discharges. The database includes the storm system and open waterways and includes pipes (classified as mainlines, lateral lines, private, etc.) and points (catch basins, maintenance holes, outfalls, inlets, etc.). Staff monitors outfalls either visually or by sampling and uses them to identify point sources for tracking illicit discharges and/or spills.
6. Erosion Control: Administer and enforce County adopted regulations as they pertain to Sediment Control regulations in the UTZ. Partner with the County for erosion control training so staff can educate and inform contractors and developers. Partner with the County for provide post-construction stormwater system maintenance inspection and compliance out to the Springfield UGB.
7. Nuisance Abatement: Partner with the County to develop and implement code authority to prohibit and enforce the dumping of nuisance waste associated with construction sites.
8. Provide necessary documentation to the County required for annual report writing of the County's Phase II permit.

Affected staff would include all Environmental Services water resources group members, administrative and managerial staff from the division, DPW Operations staff and likely city upper management and the city attorney's office on occasion. An expansion of this size would have a measurable impact on staff work load and could eventually be part of the impetus for the need to increase FTE levels in the Water Resources group. That said, initially our plan would be to absorb the extra work load for a time in order to accurately quantify impacts. Additionally, since it would be the City's choice to incorporate the expanded UGB areas, it is not likely the County would be persuaded to increase their participation from a monetary standpoint. An industrial activity subject to federal permitting would not be part of the City's enforcement under federal regulations pertaining to stormwater discharge, although these discharges would still have to remain in compliance with County and/or State code(s). Oversight and enforcement of industrial stormwater permit holders is governed and regulated by the Oregon Department of Environmental Quality (OR DEQ).

In this scenario the City's industrial pretreatment program would not be impacted significantly.

The pretreatment program is charged with permitting and regulating industrial dischargers who are connected to the regional wastewater collection and treatment system. The areas under consideration do not at this time contain infrastructure to connect to the sanitary sewer system, in addition the areas would ultimately have to be annexed prior to any connection to the regional wastewater system.

In considering scenario (2), much of the impact to the water resources group would be the same as scenario 1, however, with annexation, stormwater fees would apply to most users of the system, therefore generating revenue to help offset increased operational and managerial costs. Note that annexation could also open the door for infrastructure improvements such as construction of additional sanitary sewer. If this were the case, a number of currently unregulated businesses have the potential to connect to the sanitary sewer which could result in issuance of industrial discharge permits and/or general requirements for best management practices. If this were the case, work load for the Industrial Pretreatment group would be impacted.

Affected staff would include all Environmental Services water resources group members, administrative and managerial staff from the division, DPW Operations staff and likely city upper management and the city attorney's office on occasion. An expansion of this size would have a measurable impact on staff work load and could eventually be part of the impetus for the need to increase FTE levels in the Water Resources group. That said, initially our plan would be to absorb the extra work load for a time in order to accurately quantify impacts.

An industrial activity subject to federal permitting would not be part of the City's enforcement under federal regulations pertaining to stormwater discharge, although these discharges would still have to remain in compliance with City and/or State code(s). These codes include water quality protection, riparian protection, building, stormwater management, erosion control, wetland protection, and nuisance codes. Oversight and enforcement of industrial stormwater permit holders is governed and regulated by the Oregon Department of Environmental Quality (OR DEQ).



**MEMORANDUM**

City of Springfield

**Date:** 7/8/2014**To:** Gino Grimaldi**COMMUNICATION****From:** Lauren King, Office of City Attorney**PACKET****Subject:** Method for Estimating Employment Land Need**MEMORANDUM**

During the May 27 work session, Council requested a written analysis as to how ECO Northwest determined the employment land need. The purpose of this memo is to explain the process required under the Oregon law and outline the method applied in Springfield's CIBL/EOA. In October 2012, 1000 Friends asserted that when determining land need the city assumed low job-densities, in comparison with historical job densities. That assertion is inaccurate because the city used a site-based approach and not an acreage-based approach. Under the Oregon Administrative Rules, the city was not required to consider job densities; accordingly, the city did not consider job densities.

**Background:**

The Oregon Administrative Rules (OAR) do not require or specify any particular methodology for determining employment densities. Rather, the Goal 9 (Economic Development) OARs direct the local governments to identify types of sites that may be needed for expansion. The Goal 14 (Urbanization) OARs require that the city "... provide a reasonable justification for the job growth estimate but [the Goal] does not require that job growth estimates necessarily be proportional to population growth." OAR 660-024-0040(5).

Under Goal 9, the city must adopt an Economic Opportunities Analysis (EOA). The EOA compares the demand for land for industrial and other employment uses to the existing supply of such land. Goal 9 requires the EOA to include: (1) a review of national, state, regional, county and local trends; (2) identification of required site types; (3) an inventory of industrial and other employment lands; and (4) an assessment of community economic development potential. OAR 660-009-0015. Additionally, local governments are strongly encouraged to assess the community economic development potential through a public input based process. OAR 660-009-0015(5).

When identifying required site types, as described in the second step above, the EOA 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. "Industrial or other employment uses with compatible site characteristics may be grouped together into common site categories." OAR 660-009-0015(2).

To arrive at the "land need" for a UGB expansion cities rely on different methods. Some cities determine their need by first determining the average number of employees per acre their industries use ("current job density"), then dividing that number into the projected population to establish how many acres the city will need for employment. This approach presumes that future employment growth will be unchanged from the trends of history, and presumes no significant change in the mix of industries. Alternatively, cities may determine the land needs of prospective employers based on the target industries; and then calculate the number of sites needed for each category of size of firm. The total acreage is then determined by multiplying the number of sites by the average site size for that category of firm. *See Friends of Yamhill County v. Newberg*, 210 WL 3453459 (2010). Springfield's process is akin to the latter.

**Springfield's Process:**

Consistent with the Goal 9 requirements, and documented in our CIBL/EOA, ECO Northwest used a site-based approach to project Springfield's employment land need. The approach considered historical development patterns on commercial and industrial lands, the forecast of future employment growth, and Springfield's vision and aspirations for economic development, as articulated in the City's economic development objectives. This approach is not based entirely on historical demand. A historical demand-based approach projects employment land need based predominately on the forecast of employment growth, using historical employment densities (e.g., the number of employees per acre) to estimate future commercial and industrial land demand.

Rather this is a site-based approach, considering multiple factors that relate to the needs of the sites. The attached 2010 memo from ECO Northwest outlines the method for estimating employment land needs. Specifically, ECO based the analysis of employment site and land needs on the following considerations:

- Factors that affect firms' locational decisions
- Common site requirements
- Forecast of employment growth
- Historical employment development patterns
- Springfield's economic development aspirations
- Estimated needed sites

**Conclusion:**

Springfield's CIBL/EOA relies on a site-based approach for determining employment land need; the approach considers multiple factors that relate to the needs of the sites. This method allows the city to consider and determine how much land is needed achieve the economic development aspirations.



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April 10, 2010

**TO: Linda Pauly and Greg Mott**  
**FROM: Bob Parker and Beth Goodman**  
**SUBJECT: METHOD FOR ESTIMATING EMPLOYMENT LAND NEEDS IN SPRINGFIELD**

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On January 19, 2010, the Springfield City Council passed a resolution to adopt the draft Springfield Economic Opportunities Analysis (EOA) as the guiding document to support the Goal 9 element of the Springfield 2030 Plan and comply with the provisions of OAR 660-009. Through the hearings process, the City received comments from the public on a range of issues. This memorandum addresses comments from George Grier and 1000 Friends of Oregon about the connection between the employment forecast and the site needs analysis.

One of the key issues raised in the comments relates to the methods the EOA uses to estimate land need. Springfield received a number of specific comments that relate to the employment forecast and employment densities (as expressed in employees per acre) and how those figures do not support the conclusions of the EOA. The fact is that the EOA does not use employment density as a part of the site needs analysis. The employment forecast is only tangentially used. The remainder of this memorandum describes (1) ECO's interpretation of the Goal 9 requirements, and (2) how ECO used that interpretation to develop the site needs analysis.

## 1 WHAT GOAL 9 REQUIRES

At the broadest level, Goal 9 and its related Administrative Rules (OAR 660-009) states the following intent:

“The intent of the Land Conservation and Development Commission is to provide an adequate land supply for economic development and employment growth in Oregon.” OAR 660-009-0000

Goal 9 requires cities to state objectives for economic development (OAR 660-009-0020(1)(a)) and to identify the characteristics of sites needed to accommodate industrial and other employment uses to implement the economic development objectives (OAR 660-009-0025(1)).

Moreover, Goal 9 requires cities to conduct an Economic Opportunities Analysis (EOA) as defined by OAR 660-009-0015. The emphasis here is on economic *opportunity*. The Rule is flexible enough to recognize that simple linear analysis (for example new

employees divided by employees per acre equals needed acres) is an inadequate approach to providing an adequate land supply for economic development and employment growth (the stated intent of Goal 9). A key working component of an EOA is found in 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 language has three operational aspects: “sites by type...needed;” “employment growth;” and “site characteristics.” The language does not specifically address or require a particular methodology, but does suggest an examination for firms in the area to identify types of sites that may be needed for expansion.

Related to the site analysis requirement of OAR 660-009-0015(2) is the OAR 660-009-0015(4) Assessment of Community Economic Development Potential requirement:

“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.”

Section 1 is a review of national, state, regional, county and local trends; and Section 3 is an inventory of industrial and other employment lands. In short, the key passage here is must estimate the types and amounts of industrial and other employment uses likely to occur in the planning area. The requirement is to base this on the information gathered in sections 1 and 3 or on the trend analysis and buildable land inventory. There is no requirement the estimate be based on an employment forecast.

This then leads to the more specific land designation requirements articulated in OAR 660-009-0025. Subsection (1) addresses 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.”

This subsection includes two key requirements: (1) the identification of the approximate number, acreage and site characteristics of sites, and (2) compatible uses with similar site characteristics may be combined into broad site categories.

This is precisely what the Springfield EOA does. It uses lot size and locational attributes (e.g., proximity to transportation, etc.) as threshold criteria. The basic method used in the EOA is:

Local Economic Development Objectives → Target Industries →  
 Characteristics of Needed Sites → Comparison with Inventory = Number  
 of Needed Sites

Or in more detail: the stated local economic development objectives as informed by the trend analysis leads to identification of target industries. Target industries have specific site requirements; those site requirements are compared with sites with similar characteristics in the buildable lands inventory. The comparison leads to a conclusion of whether the City has an adequate land supply for economic development and employment growth as stated in OAR 660-009-0000.

**The key point of the preceding discussion is that the site needs analysis is on a site basis and not on an acreage basis.** This is consistent with Goal 9 which recognizes that not all acres have the same attributes and that some attributes are more important to certain industries than others.

The remainder of this memorandum provides a detailed explanation of how ECO conducted the site analysis.

## **2 HOW SPRINGFIELD APPROACHED THE GOAL 9 REQUIREMENTS**

Consistent with the Goal 9 requirements, ECO used a site-based approach to projecting Springfield's employment land need. This approach considers historical development patterns on commercial and industrial lands, the forecast of future employment growth, and Springfield's vision and aspirations for economic development, as articulated in the City's economic development objectives. This approach is not a demand-based approach, which projects employment land need based predominantly on the forecast of employment growth, using historical employment densities (e.g., the number of employees per acre) to estimate future commercial and industrial land demand. Rather, it is a site-based approach as described in the previous section.

The following steps describe the approach that ECO used to develop the estimate of employment site and land needs presented in Table 5-4 of the EOA:

1. **Articulate the City's economic development objectives.** At the beginning of the project (in June 2008), ECO met with the City Council and Planning Commission to discuss the City's economic development objectives. The direction to ECO and Staff was: (1) develop a reasonable and simple analysis of employment land sufficiency; (2) economic development policies should provide flexibility for future land uses; (3) consider development costs and capitalize on existing economic opportunities; (4) focus on the project outcomes; and (5) provide enough land to meet employment land needs for the next 20-years.

ECO and City staff used this direction as the guiding principles for developing the Economic Development Objectives and Implementation Strategies articulated in the memorandum dated October 15, 2008. The Commercial Industrial Buildable Lands Stakeholder Committee provided input on the economic development objectives suggested by decisionmakers and suggested implementation strategies for each objective. Other sources of input on the objectives were public input from community workshops and the City's draft Economic Development Plan.

2. **Conduct an economic opportunities analysis consistent with OAR 660-009-0015.** ECO assessed Springfield's economic opportunities based on a review of national, state, regional, county, and local trends, as well as assessed economic development potential based on Springfield's comparative advantages. The results of this analysis are presented in the EOA in Chapter 3, Appendix A. and Appendix B.
3. **Identify potential growth industries.** Based on the City's economic development objectives, the analysis in the economic opportunities analysis in the previous step, and Springfield's business clusters, ECO identified potential growth industries. These are industries that have growth potential in Springfield based on the City's comparative advantages and economic and employment trends that affect economic development throughout the Southern Willamette Valley and the entire State. The identification of potential growth industries also takes the City's aspirations for economic development (identified in the Economic Development Objectives) into consideration. The list of potential growth industries is not meant to be an exhaustive list of all possible growth industries but a list of the types of industries that are likely to locate in Springfield or that the City aspires to grow or attract.
4. **Forecast employment growth.** ECO developed a forecast of employment growth in Springfield as required by Goals 9 and 14. The employment forecast is based on an *estimate* of total employment in Springfield. The rate of employment growth used in the employment forecast is based on the Oregon Employment Department's forecast for employment growth in Lane County (employment Region 5), as allowed by the safe harbor described in OAR 660-

024-0040 (8) (a) (A). The end result of the employment forecast is an allocation of employment growth into industrial and commercial building types.

5. **Identify employment 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. ECO based the analysis of employment site and land needs on the following considerations:

- *Factors that affect firms' locational decisions.* ECO considered Springfield's opportunities and challenges for each of these factors, summarized in Table C-4 of the EOA.
- *Common site requirements.* Firms typically have similar land needs, such as need for relatively flat sites with urban services. Availability of these characteristics on employment sites in Springfield is summarized in Table C-6 of the EOA. Table C-5 provides *examples* of lot sizes typically needed for firms in selected industries. The purpose of Table C-5 is to illustrate that different types of industries need different sized sites and to provide some examples of these sites.
- *Forecast of employment growth.* The employment forecast provides one way to gauge land needs based on historical development patterns. ECO developed a forecast of employment growth (Step 4). Historical development patterns and ECO's past experience with similar projects suggest that some employment will not require new land. ECO estimated that 16% of employment would locate on land not designated for employment uses (e.g., home occupations) and 10% of new employment would be accommodated in existing industrial built space. ECO estimated that more than 10,000 employees would require new land over the planning period.
- *Historical employment development patterns.* ECO considered the need for land based on the forecast of employment growth (the approximately 10,000 employees mentioned above) and historical employment development patterns, presented in Table C-10. The range of needed sites presented in Table C-10 shows the number of sites needed based on historical employment patterns. These patterns are based on: (1) the distribution of employees by building type (e.g., general industrial or office) and site size in 2006 (shown in Table C-8); (2) the assumed distribution of the approximately 10,000 new employees (shown in Table C-9) based on the historical distribution of employees (Table C-8); and the average firm size in 2006.
- *Springfield's economic development aspirations.* Goal 9 allows cities to consider their economic development aspirations when forecasting the site and land needs. Springfield's elected and appointed officials directed ECO and Staff to provide an economic development

framework with flexibility to provide opportunities for economic development for both small employers and major employers who want to expand or locate in Springfield. These objectives are described in the Economic Development Objectives and Implementation Strategies memorandum. The range of needed sites presented in Table C-10 of the EOA takes Springfield's economic development aspirations into account.

- *Estimate needed sites.* While Table C-10 in the EOA presents a range of needed sites, Springfield is required to present a number of needed sites by site size. This estimate of presented in the EOA in Table C-11 and Table 4-4. It takes into account the minimum number of needed sites based on historical development patterns and Springfield's aspirations for economic development.<sup>1</sup>

6. **Inventory suitable buildable employment land.** OAR 660-009-0012(3) requires cities to inventory industrial and other employment lands, to identify vacant and developed lands and account for development constraints. Table 2-7 in the EOA summarizes Springfield's vacant suitable land by plan designation and Table 2-8 summarizes vacant suitable land by plan designation and site size.

The EOA goes a step further and identifies land with redevelopment *potential* in Springfield. Redevelopment potential can be thought of as a continuum – from more redevelopment potential to less redevelopment potential. The EOA does *not* attempt to quantify the amount of land that will redevelop but estimates potential for redevelopment, focusing on redevelopment potential in Downtown Springfield and Glenwood. The reason that ECO presented the analysis of redevelopment is that one of the City Council's priorities is facilitating redevelopment in Downtown and Glenwood, as described in the Economic Development Objectives and Implementation Strategies memorandum.

7. **Compare the demand for with the supply of employment sites and land.** Table 5-1 presents a comparison of vacant and potentially redevelopable buildable sites with the estimate of needed sites (Table 4-4). Table 5-1 concludes that Springfield has a deficit of commercial and mixed use sites between 1 acre and 50 acres in size and industrial sites larger than 20 acres. ECO used an estimate of the average size of needed sites in Springfield (Table 5-2) to convert from the number of needed sites (Table 5-1) to employment

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<sup>1</sup> The approach used to estimate needed sites uses a site-based approach, rather than a demand-based approach, which projects employment land need based predominantly on the forecast of employment growth, using historical employment densities (e.g., the number of employees per acre) to estimate future commercial and industrial land demand. The site-based approach considers the forecast for employment growth and historical employment demand patterns but also considers the City's economic development policies and aspirations.

land needs (Table 5-4). The estimate of employment land needs makes the following assumptions about needed sites:

- *Need for sites smaller than 5 acres will be accommodated through redevelopment.* One of the City's economic development strategies is to encourage redevelopment, especially in Downtown and Glenwood – as well as any other “node” as defined through the TransPlan process. Table 5-1 shows that Springfield concludes that 187 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 23 commercial and mixed use sites smaller than five acres, which would require 71 acres of land. Table 5-4 shows no need for vacant land to accommodate demand for sites smaller than 5 acres.
- *The average size of large sites.* The size of larger sites (those over 5 acres) includes a wide range of site sizes. A prior version of the EOA presented two possible sizes for these larger sites, intended to both illustrate the fact that there is a wide range of potential site sizes and to give policymakers an option for choosing the preferred site size to meet the City's economic development objectives and aspirations.<sup>2</sup> The size of sites in the current version of the EOA reflects direction from decisionmakers on their preference for site size to meet the City's economic development objectives and aspirations.

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<sup>2</sup> This version of the EOA was from November 2008 and noted that the final EOA would present one estimate of land need, rather than a range of land need.



**PAULY Linda**

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**From:** SLO Farm Season Local Organics <slo.farm@gmail.com>  
**Sent:** Wednesday, May 28, 2014 8:26 PM  
**To:** PAULY Linda  
**Subject:** Seavey Loop Farmers

Hello,

We are writing you today to state our opposition to industrial development on Seavey Loop. We operate SLO Farm, a certified Organic farm operation located at 34141 Seavey Loop Rd. We cultivate approximately 11 acres of mixed fruit trees and annual vegetables. We have been operating our farm business at this location for seven years and have a current agreement to continue for another ten years. We grow Apples, Pears, Plums, Prunes, Grapes, Quince, and Blackberries. Also snap peas, green beans, lettuce, kale, broccoli, cabbage, cucumbers, zucchini, and winter squash.

We harvest approximately 10,000 - 12,000 pounds of tree fruit and 5,000 - 8,000 pounds of vegetables annually. All of our produce is sold locally in Eugene and Springfield. We vend at Farmers' Markets and also sell to grocery stores such as Sundance and Kiva.

We hope to continue to grow healthy food for our community for many years. Industrial development nearby could negatively impact our business by polluting the groundwater we use to irrigate our crops. Our livelihood is derived directly from the health of the soil, water and ecology of Seavey Loop. We need the insects to pollinate our crops; we need clean water and soil in order to adhere to the Organic standards and to produce the high quality produce demanded by our customers.

Thank you for your consideration,

Thomas Murray  
Rachel Weiner

SLO Farm  
Seasonal. Local. Organic.  
34141 Seavey Loop Rd  
Eugene, OR 97405

[slo.farm@gmail.com](mailto:slo.farm@gmail.com)

Date Received: 5-28-14  
Planner: LP

Attachment 5, Page 2 of 36

Rachel Kim Herrick and Larry Norris

86160 Hoya Lane

Eugene, Oregon 97405

June 4, 2014

Springfield City Council

c/o Ms Linda Pauly, Principal Planner

RE: No extension of the UGB and Industrial Zoning into Seavey Loop

My wife and I own a 6.5 acre Horse Training Facility at 86160 Hoya Lane, off of Seavey Loop . We have developed our dream of this Horse Training Facility over the last 11 years, that we have lived here. A year and a half ago we tore down an old barn and built a new horse barn and an out building for additional horse stalls. Last month we sold a second home, to give us the capital to build an outdoor arena , re-fence and continue developing our property. My wife (Rachel Kim Herrick) who has been training and competing in Dressage for 12 years, is now a dressage trainer with students. We are one of many horse facilities in the Seavey Loop/Mt Pisgah area that would be adversely affected by an expanded industrial zone in our backyard. Our well, from which we get our drinking water, is 35 feet deep. We fear that new industrial land within 3/4's of a mile of our home will have a negative impact on our ground water. It seems unbelievable that the city of Springfield would pick our beautiful neighborhood for their future industry.

There are several points that we would like to make:

1. Seavey Loop and Mt Pisgah are conveniently located just 10 minutes from Eugene and Springfield. Mt Pisgah, Buford Park, the Arboretum, Nature Conservancy Land, Turtle Flats and the extension of Ridgeline Trail have been, and are being developed because of their close proximity to our cities for people to get away to nature. Why would we want to locate industry at a gateway to a

natural experience for over 500,000 visitors annually?

2. Johnson Crushers International (JCI) gives a preview of what we will be dealing with, if we allow industry to take over Seavey Loop. JCI is located across from EPUD. In 2011, JCI was fined \$147,788 for excessive emissions of toxic xylene between 2004-2009. JCI has also had compliance violations as recently as March 2, 2012 and April 19, 2012 for releases of Xylene, Copper, Lead, Manganese, Nickel, and Chromium. What is to stop pollutants from moving from industrial ground into other Seavey Loop parcels where our ground water is just under the surface? Neighbors of JCI have complained of non-stop noise day and night to no avail.

3. The flood plain runs through areas designated for this industrial zone. One good flood will wash industrial pollutants into the Willamette river and beyond.

4. Springfield has not shown a need for more industrial land. Springfield has not used existing industrial land they already have in South Springfield and Glenwood.

5. Proposed industrial land would back right up to existing housing areas. People in these communities have invested millions of dollars in their homes and farms, which would lose value and become impossible to sell with industry right next door.

My Wife and I will do anything we have to , to stop industrial zoning and expansion of Springfield's Urban Growth Boundary into our neighborhood.

Sincerely, Larry Norris and  
Rachel Kim Herrick

**PAULY Linda**

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**To:** Larry Norris  
**Subject:** RE: Against extension of Springfield's UGB to Seavey Loop and rezoning it Industrial Zoning

Thank you Mr. Norris. I cannot open your .md attachment. Could you please send it in the body of your email or in pdf or Word format. You could also fax it to me at the number below my signature, or mail it to me.

Linda Pauly

Linda Pauly, AICP  
Principal Planner  
City of Springfield  
225 Fifth street, Springfield OR 97477  
(541) 726-4608 Fax (541) 726-3689  
<http://www.springfield-or.gov/dpw/ComprehensivePlanning.htm>



**From:** Larry Norris [<mailto:larrynorris4@gmail.com>]  
**Sent:** Wednesday, June 04, 2014 11:25 AM  
**To:** PAULY Linda  
**Subject:** Against extension of Springfield's UGB to Seavey Loop and rezoning it Industrial Zoning

Date Received: 6-4-14  
Planner: LP

10/15/2014 10:10 AM

Dear Linda,

My husband and I reside at 34753 Seavey Loop Rd. Additionally we own 34707 Seavey Loop and 34748 Seavey Loop Rd. We are the McBees.

My husband's grandfather came to live on Seavey Loop Rd in the early 1900s. At one point a large majority of Seavey Loop was owned by the McBee family, his grandfather, parents and aunt and uncle. The McBees were one of the original farm groups on Seavey Loop Rd. The crops they grew included green beans, peaches, cherries, filberts etc. I'm a native Springfield person. My family owned businesses in down town during the 60s, my family supported the building of McKenzie Willamette Hospital, our roots are here, this is our community. We now own approximately 21 acres, covering 5 parcels of land and three homes, all part of the original homestead, all occupied by family members.

Today, we use our land to raise beef cattle, meat chickens and turkeys and yes, big brown eggs. We feed a number of families every year with our all natural products. We have the privilege of showing our farm to young families with children. Imagine the first time a child sees where their food comes from. We have groups of handicapped and elderly come and use our place for "field trips". What a great experience these citizens have collecting eggs and feeding bottles to new baby cows/ All our beef are born and raised here, on this rich bottom land. One of the many things that we have enjoyed is watching families return to our area. Many kids that grow up on Seavey Loop in their later years, return buy property and begin their family here, at home.

The UGB project will effect our livelihood and quality of life. As I look at the other areas being considered I question why impact the area that feeds our community? The other sites do not offer the same abundance of food and quality of life. I am afraid of the pollution that will come with the industrialization of this site. I understand that the largest proponent of this project is JCI. They have a past which includes many environmental violations. We are also concerned about effects of noise, traffic, air and water quality, etc. This frightens me. I agree change is necessary but to negatively effect an area that produces good wholesome products should not be an option. Feeding our community is important.

My appeal is heartfelt. This little piece of Heaven is rich in our environment. Between the flocks of geese, deer, raccoons and other wildlife, waking in our community is always bliss. Most Saturdays you can hear the bicycle groups swooshing around the corners long before they arrive at your home. The many laughing voices as people walk, jog or ride their horses in our area is delightful. Our world needs places like this to go to and enjoy, where a person can pick strawberries, peaches, cherries, or pumpkins, hike a mountain, learn about our native plants truly enjoy why we like living in Oregon - its natural beauty and what nature has to offer.

I ask you to consider the damage to the community and our livelihoods, not just for the land owners, but all the people of our community. Please carefully consider the optional sites for the long term effect on each area, and make the choice to preserve our precious community and all the good it brings to lane county residents.

Pamela McBee

Date Received: 6-10-14  
Planner: LP

10/10/2014 10:10:10 AM

**PAULY Linda**

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**From:** mary ivy <marycivy@yahoo.com>  
**Sent:** Saturday, June 14, 2014 10:12 AM  
**To:** PAULY Linda  
**Subject:** Opposition to Industrial Development on Seavy Loop

Dear Ms. Pauly,

I am writing to ask you to please block the proposed industrial development on Seavy Loop. This is such a beautiful area and NEIGHBORHOOD, AND is on the way to Misgah, one of Springfield/Eugene absolute treasures. I hope this is not tarnished.

Thank you for your time, consideration, and care,

Mary Ivy  
97402-3970

Date Received: 6-16-14  
Planner: LP

10/10/10 10:10:10  
10/10/10 10:10:10

**PAULY Linda**

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**From:** emptygate@comcast.net  
**Sent:** Tuesday, June 24, 2014 10:56 AM  
**To:** PAULY Linda  
**Subject:** Industrial Demand Projection

Dear Linda,

(1) Thanks so much for your help as always! Please do let me know if you can provide anything further for the mapping.

(2) Based on the information you provided about the demand projection process and a subsequent discussion with Beth Goodman, I have decided to delete that bullet point.

The demand projection is not really our issue. We are the Seavey Loop group, simply lobbying for our rights on adjacent farms and forest under Goal 14.

Sincerely yours,  
- Charles Stewart

Date Received: 6-24-14  
Planner: LP

Faint, illegible text or markings at the bottom left of the page.

**PAULY Linda**

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**From:** RIPKA Amy on behalf of Springfield CMOMail  
**Sent:** Thursday, July 03, 2014 8:11 AM  
**To:** PAULY Linda  
**Subject:** FW: I say No to JCI  
**Attachments:** SeavyLoop002.jpg

Linda,

Please review the email below and respond if necessary. Please note that this email also went to the Mayor.

Thank you,

AJ Ripka  
Administrative Assistant  
City Manager's Office  
225 Fifth Street  
Springfield, Oregon 97477  
541-726-3700 FAX: 541-726-2363



Messages to and from this e-mail address may be subject to disclosure under Oregon Public Records Law.

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**From:** Harmony [mailto:msharmony2001@msn.com] ✓ *added to IP list 7-3-14*  
**Sent:** Wednesday, July 02, 2014 11:37 PM  
**To:** Springfield CMOMail; Springfield Mayor  
**Subject:** I say No to JCI

We need to stop this kind of expansion. We need to save what's left of your clean waters, and we need to stop polluting our air. Tell JCI and the corporation that owns them to expand somewhere else. I am helping spread the word of this. On the streets, Facebook, and emails. I do hope the city of Springfield feels the same way about what is left of nature in our area.

<https://www.facebook.com/photo.php?fbid=10201338840432663&set=a.4298726046026.1073741828.1822900135&type=1&theater>

Date Received: 7-3-14  
Planner: LP

Harmony, O. Cannon  
2050 2nd Street  
Springfield



- ◆ **Not compatible with agriculture**
- ◆ **Not compatible with homes**
- ◆ **Not compatible with the park**
- ◆ **Harmful to species and ecosystems**
- ◆ **Not economical or feasible**

**CONTACT CITY OF SPRINGFIELD**  
(541) 726-3702  
mayor@springfield-or.gov

★ **NoIndustrialPisgah.org** ★

**PAULY Linda**

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**From:** GRIMALDI Gino  
**Sent:** Monday, July 07, 2014 1:28 PM  
**To:** PAULY Linda  
**Subject:** FW: Stop the Seavey Loop Industrial Zone!

---

**From:** Springfield Mayor  
**Sent:** Monday, July 07, 2014 12:00 PM  
**To:** GRIMALDI Gino  
**Subject:** Fwd: Stop the Seavey Loop Industrial Zone!

Begin forwarded message:

**From:** "wb53grimes@comcast.net" <wb53grimes@comcast.net>  
**Date:** July 5, 2014 at 7:03:31 PM PDT  
**To:** Springfield Mayor <mayor@springfield-or.gov>, "VANGORDON Sean (Springfield Councilor)" <svangordon@springfield-or.gov>, "WYLIE Hillary (Springfield Councilor)" <hwylie@springfield-or.gov>, "smore@springfield-or.gov" <smore@springfield-or.gov>, "RALSTON Dave (Springfield Councilor)" <dralston@springfield-or.gov>, "mwoodroww@springfield-or.gov" <mwoodroww@springfield-or.gov>, "BREW Bob (Springfield Councilor)" <bbrew@springfield-or.gov>, STEWART Faye H <Faye.STEWART@co.lane.or.us>, "Jay.Gozievich@co.lane.or.us" <Jay.Gozievich@co.lane.or.us>, LEIKEN Sid W <Sid.LEIKEN@co.lane.or.us>, SORENSON Pete <Pete.Sorensen@co.lane.or.us>, "FARR Pat M (LC)" <Pat.FARR@co.lane.or.us>  
**Subject:** Stop the Seavey Loop Industrial Zone!

We have lived in the Seavey Loop area for 2+ years and do not want to see it change. There should be other areas where industrial businesses could locate and where the city can keep an eye on them easier to ensure they stay in compliance with EPA and other agencies.

Our family use to live in a city that allowed industrial businesses to develop in a residential/farming area and it was disastrous! Ground water was contaminated; contaminated run-off leached into water pipes making it undrinkable; birds and other wildlife in the area were dying and those left had to be relocated; remaining farmers couldn't raise crops worth selling due to the contaminated water in wells and piped in water; and the companies found in non-compliance took YEARS to come into compliance.

The Mt. Pisgah area is a nice, clean area that is enjoyed by several hundreds of people but that could all end if industrial businesses are

Date Received: 7-7-14

brought in. Because Seavey Loop is the sole gateway to this park, the zone would deface the gateway, would push out the farmers who still provide a lot of food to people in the area; and there are essential salmonid habitats in the area that will be affected as well as critical species at the Oxley Slough and Turtle Flats.

Essentially, Seavey Loop is the worst location for industrial development in terms of the economic, social and environmental consequences, dozens of farms that supply local markets, over 600 residential homes, a fragile ecosystem, and it is the only entrance to Lane County's largest park.

We really like the area that we live in and would hate to see it damaged beyond repair by industrial businesses.

Please Stop the Seavey Loop Industrial Zone!!

Thank you,

Wanda & Joe Grimes

**PAULY Linda**

---

**From:** GRIMALDI Gino  
**Sent:** Monday, July 07, 2014 1:28 PM  
**To:** PAULY Linda  
**Subject:** FW: Seavey Loop

---

**From:** Springfield Mayor  
**Sent:** Monday, July 07, 2014 12:00 PM  
**To:** GRIMALDI Gino  
**Subject:** Fwd: Seavey Loop

Begin forwarded message:

**From:** Nita Myers <[faar2manycats@gmail.com](mailto:faar2manycats@gmail.com)>  
**Date:** July 5, 2014 at 3:55:23 PM PDT  
**To:** Springfield Mayor <[mayor@springfield-or.gov](mailto:mayor@springfield-or.gov)>  
**Subject:** Seavey Loop

Hello

I am not sure who to address this to so am starting at the top. With all due respect, I have the following comments and question:

I received a flyer in the mail today advising that Springfield is looking at this area to annex for industrial use.

The area outlined on the map is zip code 97405 all the way up into the arboretum and is described as southeast rural Eugene. Is Springfield planning to steal this area from Eugene?

How can you justify ruining this community and the water areas and natural habitat to build a sewage plant or any other sort of "industrial" complex? This area floods. There is a huge potential for sewage or any other type of surface pollution to run in the river and kill off whatever living things are there -- frogs, turtles, plants, fish, anything else that lives in water and along the banks. The potential for pollution of all kinds imaginable cannot be ignored.

With all due respect you need to listen to this community. I remember the noise from that all-weekend band event and I remember how loudly this community spoke out against noise pollution and the disruption of our quiet country life. We can still see the stars at night and we do not want our night sky to disappear.

The industry right across the road was fined \$150 thousand for air pollution but they still pollute. There is no way you can guarantee pollution won't happen. '

Please find another place less inhabited and less environmentally threatened for your industrial zone.

Date Received: 7-7-14  
Planner: LP

10/10/10  
10/10/10

**PAULY Linda**

---

**From:** GRIMALDI Gino  
**Sent:** Monday, July 07, 2014 1:29 PM  
**To:** PAULY Linda  
**Subject:** FW: stop the seavey loop industrial zone

---

**From:** Springfield Mayor  
**Sent:** Monday, July 07, 2014 11:53 AM  
**To:** GRIMALDI Gino  
**Subject:** Fwd: stop the seavey loop industrial zone

Gino,  
Here is another email I am passing along for the record. Christine

Begin forwarded message:

**From:** McKay Sohlberg <[mckay@uoregon.edu](mailto:mckay@uoregon.edu)>  
**Date:** July 6, 2014 at 11:40:35 AM PDT  
**To:** Springfield Mayor <[mayor@springfield-or.gov](mailto:mayor@springfield-or.gov)>  
**Subject:** stop the seavey loop industrial zone

Dear City of Springfield:

I am writing to express my concern about the Seavey Loop Industrial zone that has been receiving attention. I spend much time in the Buford Park area cycling, walking, and hiking. I come from Eugene to spend time in this area and I think it is one of the jewels of our region. Springfield has got so much right lately in terms of development that I hope good choices for the community will continue to be made. This plan does not make environmental or economical sense. Please stop the industrial zone.

McKay Sohlberg

*McKay Moore Sohlberg PhD CCC-SLP*  
HEDCO Endowed Professor  
Director of Communication Disorders & Sciences  
University of Oregon  
Eugene OR 97403  
Ph (541) 346-2586

Date Received: 7-7-14  
Planner: LP

10/10/2018 10:10:10 AM  
C:\Users\user\Documents\10-10-2018 10-10-10 AM  
10/10/2018 10:10:10 AM

**PAULY Linda**

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**From:** GRIMALDI Gino  
**Sent:** Monday, July 07, 2014 1:29 PM  
**To:** PAULY Linda  
**Subject:** FW: Seavey Loop Industrial Zone is a horrible, destructive idea

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**From:** Springfield Mayor  
**Sent:** Monday, July 07, 2014 11:47 AM  
**To:** GRIMALDI Gino  
**Subject:** Fwd: Seavey Loop Industrial Zone is a horrible, destructive idea

Gino,  
Not sure who all this email went to so I am forwarding it to be included in the comments. Christine

Begin forwarded message:

**From:** "[lesliedosreis@comcast.net](mailto:lesliedosreis@comcast.net)" <[lesliedosreis@comcast.net](mailto:lesliedosreis@comcast.net)>  
**Date:** July 6, 2014 at 9:52:58 AM PDT  
**To:** Springfield Mayor <[mayor@springfield-or.gov](mailto:mayor@springfield-or.gov)>  
**Subject:** Seavey Loop Industrial Zone is a horrible, destructive idea

Please vote NO on the Seavey Loop industrial zone!! As a 40 year resident of this community and recently retired Springfield physician (former Chief of Radiology at McKenzie-Willamette Hospital), I believe that expanding the small industrial area between I5 and Franklin eastward into almost 30% of the residential farm and park lands of Seavey Loop would almost certainly pollute the aquifer supplying well water to existing homes and farms. Much of the area is flood prone and a flood event would contaminate the Coast Fork and then the Middle Fork of the Willamette River upstream of Springfield. Aztec Industries spearheading this proposal has been fined by the EPA in the past. They are bad, self-serving neighbors. The heroic efforts of the Mt Pisgah Arboretum, Howard Buford Recreation Area and the Nature Conservancy, Lane County Government and local farms such as Me and Moore to improve this already special area would be nullified by major nearby industrialization. And please don't propose "clean industry"-if it exists/I doubt it in actual practice- which would also seriously hurt the area's residential farmland and parks. Please don't ruin the lives of those who live in the Seavey Loop area.

Leslie Dos Reis, MD (retired)

Date Received: 7-7-14  
Planner: LP



**PAULY Linda**

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**From:** GRIMALDI Gino  
**Sent:** Monday, July 07, 2014 2:50 PM  
**To:** PAULY Linda  
**Subject:** FW: Mt. Pisgah

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**From:** Springfield Mayor  
**Sent:** Monday, July 07, 2014 1:46 PM  
**To:** GRIMALDI Gino  
**Subject:** Fwd: Mt. Pisgah

Begin forwarded message:

**From:** Karen Lundblad <[kklundblad@gmail.com](mailto:kklundblad@gmail.com)>  
**Date:** July 5, 2014 at 1:03:18 PM PDT  
**To:** Springfield Mayor <[mayer@springfield-or.gov](mailto:mayer@springfield-or.gov)>  
**Subject:** Mt. Pisgah

Dear Mayor Lundberg,

Please consider not re-zoning the Mt. Pisgah Industrial area. I have lived there for 17 years and bought a home there because of the bucolic nature of the land.

My biggest concerns are water, noise and air pollution. Those impacts on farmland and especially the Arboretum could be devastating. The nature of the park and farmland needs to be preserved for our grandchildren and beyond.

Thank you for your consideration.

Karen Lundblad  
86140 Garden Valley Rd  
Eugene, OR 97405

Date Received: 7-7-14  
Planner: LP

11/15/2017 10:00 AM

**PAULY Linda**

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**From:** Springfield Mayor  
**Sent:** Tuesday, July 08, 2014 3:07 PM  
**To:** catman6895@aol.com  
**Cc:** PAULY Linda; LAUDATI Niel  
**Subject:** Re: Stop the Seavey Loop Industrial Zone

I am forwarding your email for inclusion in the public comments. Christine Lundberg

On Jul 7, 2014, at 7:47 PM, "[catman6895@aol.com](mailto:catman6895@aol.com)" <[catman6895@aol.com](mailto:catman6895@aol.com)> wrote:

Your going to ruin farm land, the sloughs, the farmers will lose their places to grow their crops, and take away all the beautiful scenery, that is out in Seavey Loop. that is the problem with the city of springfield, they don't care about the people at all, its only what matters for them and how it will benefit them. All the city can do is think of ways to spend tax payers money and ruin it for the people of Springfield and the out lying areas. I bet if any of you lived out in the Seavey Loop area, it would be a different story and if any of you do, you don't care about your neighbors at all trying to do this. their is a phone number to call for the city of springfield, but of course every time I call it about this, it is not taking calls it says, which would be something else you would do, what's wrong don't you want to hear how people actually feel about this industrial zone. What kind of Mayor are you to even think about allowing this kind of industrial zone. Let the people vote on it and see how far it goes.

Date Received: 7-9-14  
Planner: LP

10/10/2019 10:10:10 AM

**PAULY Linda**

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**From:** Springfield Mayor  
**Sent:** Tuesday, July 08, 2014 3:12 PM  
**To:** Nita Myers  
**Cc:** PAULY Linda; LAUDATI Niel  
**Subject:** Re: Seavey Loop

I believe the area was originally part of Eugene, but a request was made by folks in Glenwood to have Springfield add it to our jurisdictional boundary. Eugene apparently didn't care and didn't want the Glenwood area to remain in Eugene control so they agreed to the transfer. This happened at least 10 years ago. As for zip codes and addresses they do not automatically change. The process to change the zip code and addresses is on our to do list.

Christine

On Jul 7, 2014, at 6:35 PM, "Nita Myers" <[faar2manycats@gmail.com](mailto:faar2manycats@gmail.com)> wrote:

With all due respect -- if the land is not Eugene -- why do we have a Eugene zip code and why do we have Eugene addresses?

On Mon, Jul 7, 2014 at 11:59 AM, Springfield Mayor <[mayor@springfield-or.gov](mailto:mayor@springfield-or.gov)> wrote:

Dear Nita,

Thank you for your input. The land in question is not in Eugene. I believe that it would be helpful for you to talk with City staff so you can get better, clearer information. The City Council will carefully consider all of the information and public comment before making any decision. Please call [541-726-3700](tel:541-726-3700) and ask for Linda Pauly. She is the primary staff working on the UGB proposals.

Christine

> On Jul 5, 2014, at 3:55 PM, "Nita Myers" <[faar2manycats@gmail.com](mailto:faar2manycats@gmail.com)> wrote:

>

> Hello

>

> I am not sure who to address this to so am starting at the top. With all due respect, I have the following comments and question:

>

> I received a flyer in the mail today advising that Springfield is looking at this area to annex for industrial use.

>

> The area area outlined on the map is zip code 97405 all the way up into the arboretum and is described as southeast rural Eugene. Is Springfield planning to steal this area from Eugene?

>

> How can you justify ruining this community and the water areas and natural habitat to build a sewage plant or any other sort of "industrial" complex? This area floods. There is a huge potential for sewage or any other type of surface pollution to run in the river and kill off whatever living things are there -- frogs, turtles, plants, fish, anything else that lives in water and along the banks. The potential for pollution of all kinds imaginable cannot be ignored.

>

Date Received: 7-9-14

Planner: LP

> With all due respect you need to listen to this community. I remember the noise from that all-weekend band event and I remember how loudly this community spoke out against noise pollution and the disruption of our quiet country life. We can still see the stars at night and we do not want our night sky to disappear.

>

> The industry right across the road was fined \$150 thousand for air pollution but they still pollute. There is no way you can guarantee pollution won't happen. '

>

> Please find another place less inhabited and less environmentally threatened for your industrial zone.

>

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## PAULY Linda

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**From:** Springfield Mayor  
**Sent:** Wednesday, July 09, 2014 12:45 PM  
**To:** Nita Myers  
**Cc:** GRIMALDI Gino; PAULY Linda; LAUDATI Niel; SOWA Amy  
**Subject:** Re: Seavey Loop

Nita,  
I think we could have a more productive conversation in person. I know Amy is trying to setup a meeting. I hope that will work for you. Christine

On Jul 9, 2014, at 10:49 AM, "Nita Myers" <[faar2manycats@gmail.com](mailto:faar2manycats@gmail.com)> wrote:

Please forgive me if I sound rude or ill mannered. I mean no disrespect.

We do not want growth out here. Agencies have been working at reclaiming damaged areas along the river and opening bike and hiking trails and much more. Do you not remember all the discord last summer when someone allowed those VERY LOUD bands into the park? Why do you want to destroy the peace and quiet of our community? Why would you want to throw the efforts of multiple agencies to reclaim and rebuild natural habitats and wetlands along the waterway for water species including wildlife species out the window? These animals are all needed to maintain a healthy ecosystem. Rezoning and demolishing our community makes no sense. We are a quiet agricultural area -- there is no room for the noise and devastating pollution of industry. There can be no promise that "it" won't happen -- the cacophony that was turned loose on us last summer is proof.

The flyer I received is approximately 11 x 14. On one side it says Stop Seavey Loop Industrial Zone. The other side provides a map with the area proposed highlighted in red and a list of county officials and is put out by [NoIndustrialPisgah.org](http://NoIndustrialPisgah.org)

There are several issues mentioned and one of them suggests a wastewater plant (we all know that's human sewage) at the corner of Seavey Loop Road and Franklin Blvd East. Where are you going to put it? Those plants are **huge**. And the river is too nearby. The banks are low and there is the absolutely very high likelihood that when the river floods in the winter time human excrement would get into the water system -- and you cannot guarantee it wouldn't -- and innocent wildlife would suffer from the thoughtlessness and ill planning. We all know that if a sewer line were located in this area the bill would fall on us as landowners. It is not fair to impose something on us we do not want and then make us pay for it. For proof - consider the events when Eugene annexed River Road against popular desire and then demanded the citizens pay for the "improvements" and people lost their property because they couldn't pay. That was not right -- and it was not fair. Also consider the damage to the wetlands on Wilson Road off W 11th. Wetlands were devastated and the promise to rebuild wetlands was not totally upheld. So what if they were fined! The damage was done and all that habitat was lost. And the fine money was recovered in tax breaks.

If you want to consider a site for a plant to deal with human waste, consider a dry arid place such as the abandoned Wildish property on Franklin Blvd about half a mile south of Glenwood. It could be added to the "Rebuild Franklin Blvd Plan."

Date Received: 7-9-14  
Planner: LP

I've seen an overview of the plan to metropolize Glenwood and I know beyond any doubt that growth is inevitable. However any effort to grow must be held to a very high standard of accountability. Deciding bodies can sit down and make promises all day long that this or that will or will not happen but we all know those promises won't or cannot be kept -- and we all know who will foot the bill.

There is no need to compromise this community when more feasible areas are available.

On Tue, Jul 8, 2014 at 6:59 PM, Springfield Mayor <[mayor@springfield-or.gov](mailto:mayor@springfield-or.gov)> wrote:  
I haven't seen the flyer that you received. I am concerned that the information in it is misleading leaving everyone with more questions than answers. I would like to have someone from City staff meet with you and go over your questions and concerns. If possible I would be happy to sit in on the meeting. We have made no decisions concerning expansion, but are now beginning to take a serious look at areas that are eligible for growth. Let me know if you would like to meet, I can have the City setup a date and time.

Christine

On Jul 8, 2014, at 6:03 PM, "Nita Myers"  
<[faar2manycats@gmail.com](mailto:faar2manycats@gmail.com)<<mailto:faar2manycats@gmail.com>>> wrote:

Learn something new every day.

I have been here since 1989, and this is the first I've heard of it.

Why do you think it necessary to bother our community -- why can't you just leave well enough alone?

On Tue, Jul 8, 2014 at 3:12 PM, Springfield Mayor <[mayor@springfield-or.gov](mailto:mayor@springfield-or.gov)<<mailto:mayor@springfield-or.gov>>> wrote:  
I believe the area was originally part of Eugene, but a request was made by folks in Glenwood to have Springfield add it to our jurisdictional boundary. Eugene apparently didn't care and didn't want the Glenwood area to remain in Eugene control so they agreed to the transfer. This happened at least 10 years ago. As for zip codes and addresses they do not automatically change. The process to change the zip code and addresses is on our to do list.

Christine

On Jul 7, 2014, at 6:35 PM, "Nita Myers"  
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On Mon, Jul 7, 2014 at 11:59 AM, Springfield Mayor <[mayor@springfield-or.gov](mailto:mayor@springfield-or.gov)<<mailto:mayor@springfield-or.gov>><<mailto:mayor@springfield-or.gov>>>

[or.gov<mailto:mayor@springfield-or.gov>>>](mailto:mayor@springfield-or.gov) wrote:

Dear Nita,

Thank you for your input. The land in question is not in Eugene. I believe that it would be helpful for you to talk with City staff so you can get better, clearer information. The City Council will carefully consider all of the information and public comment before making any decision. Please call [541-726-3700<tel:541-726-3700><tel:541-726-3700<tel:541-726-3700>>](tel:541-726-3700) and ask for Linda Pauly. She is the primary staff working on the UGB proposals.

Christine

> On Jul 5, 2014, at 3:55 PM, "Nita Myers"

> [faar2manycats@gmail.com<mailto:faar2manycats@gmail.com><mailto:faar2manycats@gmail.com<mailto:faar2manycats@gmail.com>>>](mailto:faar2manycats@gmail.com) wrote:

>

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> I am not sure who to address this to so am starting at the top. With all due respect, I have the following comments and question:

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> The industry right across the road was fined \$150 thousand for air pollution but they still pollute. There is no way you can guarantee pollution won't happen. '

>

> Please find another place less inhabited and less environmentally threatened for your industrial zone.

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**PAULY Linda**

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**From:** SYLLIAASEN Carole  
**Sent:** Thursday, July 10, 2014 1:24 PM  
**To:** PAULY Linda  
**Subject:** Citizen Message  
**Attachments:** 2014-07-10 Seavy Loop UGB Flyer.pdf

Hi Linda,

Charmaine Rehg (541-868-7571) came by today to express her concern for the following items:

1. She opposes any expansions that would be on flood plains.
2. She is opposed to the Seavy Loop expansion.
3. She would like to see more "in-fill" options for growth, rather than spreading outside of city limits as they stand currently.

Attached is the flyer she received regarding the opposition for Seavy Loop.

Thank you,  
Carole

Date Received: 7-10-14  
Planner: LP





- ◆ **Not compatible with agriculture**
- ◆ **Not compatible with homes**
- ◆ **Not compatible with the park**
- ◆ **Harmful to species and ecosystems**
- ◆ **Not economical or feasible**

**CONTACT CITY OF SPRINGFIELD**  
(541) 726-3702  
mayor@springfield-or.gov

**NoIndustrialPisgah.org**

