1000 friends of Oregon

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September 12, 2016

Honorable Mayor Christine Lundberg
Springfield City Council
City of Springfield
225 Fifth Street
Springfield, OR 97477

Lane County Board of Commissioners
Lane County Planning Commission
Lane County
125 E. 8th Avenue
Eugene, OR 97401

Re: Springfield UGB expansion; LRP2009-00014 (Springfield); 509-PA13-05393 (Lane County)

Dear Mayor Lundberg, Councilors and Commissioners:

Thank you for this opportunity to comment on the proposed Springfield Urban Growth Boundary (UGB) amendment. 1000 Friends of Oregon is a nonprofit, charitable organization dedicated to working with Oregonians to enhance our quality of life by building livable urban and rural communities, protecting family farms and forests, and conserving natural and scenic areas.

We have participated in this process since the original version was presented for hearing in 2009, and we appreciate the significant additional work that has been done by Springfield staff and city leadership since that time. The revised proposal is much stronger than before.

We support the determination of the August 2015 *Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis* (EOA) that over the next 20 years, Springfield will need the following large employment sites:

<u>20+ acre sites:</u>
3 industrial sites
1 commercial site

<u>5-20 acre sites:</u>
12 industrial sites
8 commercial sites

However, we do have concerns with a few other aspects of the revised proposal. They are:

<u>1. Excessive size requirements for 20+ acre sites</u>

Although we agree with the city's determination that Springfield needs four 20+ acre sites, we do not agree with the EOA's assertion that candidate sites actually need to be much larger than 20 acres in order to meet that need. The following Table 5-2 from the EOA states that "20 and Larger" sites must be, on average, 63 acres for industrial sites, and 60 acres for commercial sites.

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.

The EOA provides this rationale:

> "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." (EOA, page 78)

We are unsure exactly which sites were used to compute these averages, since Table 5-2's footnote about its data source does not cite to evidence in the record. However, we have attempted to recreate the analysis using taxlot data from Lane County. Our research suggests that the average size of existing 20+ acre employment sites cannot inform the needs of Springfield's future targeted industries.

These are the occupied 20+ acre industrial sites we found:[1]

Sierrapine mill .....71 acres
International Paper mill (main taxlot only).....175 acres
Swanson mill.....36 acres
Rosboro mill .....70 acres
Jasper-Natron mill (taxlot 1802100000200, see EOA pg. 33).....47 acres
Jasper-Natron mill (taxlot 1802100000900, see EOA pg. 36).....29 acres
High Banks warehouse .....47 acres
True Value regional distribution center .....29 acres

AVERAGE ALL SITES.....63 acres

[1] See Attachments 1-6 for aerial maps and taxlot data.

Note that these eight sites average 63 acres, which matches the EOA's determination of average industrial site size. However, as previously mentioned, since we do not have access to ECONorthwest's data, we cannot be sure that our analysis exactly matches theirs.

Regardless of the details, it is clear that most of Springfield's large industrial sites are home to paper and lumber mills. The problem is, these are legacy industries that are not among the city's targeted industries, so their size is irrelevant to Springfield's future needs. Page 65 of EOA explains that trends indicating "decline in wood products manufacturing" informed the city's selection of different targeted industries. Specifically:

> "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." (EOA pg. 85, also see Table 5-5)

As explained on page 82 of the EOA, the Goal 9 administrative rule allows cities to specify "attributes of a site necessary for a particular industrial or other employment use to operate," such as size. The meaning of the phrase "a particular industrial use" in this rule has been interpreted by DLCD to require a certain level of specificity. Industries may be grouped together for purposes of establishing necessary site characteristics such as size, but only when those industries have similar operational needs.[2]

A paper mill, with its need for large sludge ponds, railcar accommodation, and wood storage yards, has little in common with Springfield's chosen targeted industries: medical equipment, high-tech electronics and manufacturing, recreational equipment, furniture manufacturing, specialty food processing. Therefore, the site characteristics of Springfield's existing paper and lumber mills are not relevant to the required Goal 9 analysis.

Besides the six mills, our above list includes two other existing industrial sites, but both are warehouses, and distribution is not one of Springfield's targeted industries. Beyond that, while the entire High Banks warehouse site is 47 acres, as shown by the aerial photo (Attachment 5), most of it is underwater. The warehouse sits on a section of the shoreline that is considerably smaller than 20 acres. That leaves the 29-acre True Value regional distribution center as the sole example of a Springfield warehouse on a 20+ acre site.

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[2] For more on this topic, see page 17 of the 1/23/14 memo from DLCD director Jim Rue to LCDC that was posted as Agenda Item 4 to the February 13-14, 2014 LCDC Meeting. An excerpt: "In its review of objections, the department interprets the administrative rules to require a city to demonstrate that site characteristics describe operational needs of particular employment uses or groups of uses with similar operational needs. The department finds that the term 'particular' should be interpreted in a way that allows a city a reasonable and practical path to compliance with the rules while addressing its economic development needs. At the same time, it cannot be construed so broadly that it renders the term 'particular' moot. For example, requiring a city to determine, with substantial evidence, precise operational and siting needs for semiconductor manufacturing, medical device manufacturing, and nano & micro technology manufacturing separately is not practical or reasonable. On the other hand, 'manufacturing' is so broad and encompasses so many different 'particular uses' that implementing site characteristics at this level would likely not establish an adequate basis for rule compliance, much less address the practical needs of the city. In this example, 'high tech manufacturing' could be the appropriate level of aggregation that is still specific enough to be a 'particular use.'"

For commercial sites, we found only two 20+ acre sites:[3]

Peace Health hospital complex (see EOA pg.74) ..... 72 acres
Gateway shopping center (all three taxlots) ..... 48 acres

AVERAGE ALL SITES ..... 60 acres

Here, too, our average exactly matches the EOA's determination. And once again, it seems clear that these uses cannot inform Springfield's future site needs. Both uses are large, regional scale "one offs" that won't be recreated during the next 20 years. In addition, retail is not one of Springfield's targeted industries:

> "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, or multiple buildings in a "campus" environment." (EOA pg. 90, also see Table 5-5 on page 84)

In the absence of any relevant evidence to the contrary, sites that contain at least 20 buildable acres must be considered suitable to meet the need for "20+ acre sites." This correction will have significant ramifications when determining the need for additional land outside the UGB, because currently, the EOA assumes that these sites need to average at least 60 acres in size.

2. Failure to re-designate surplus industrial sites to address commercial deficit

As illustrated by the EOA's Table 5-1 (reproduced below), Springfield has 18 buildable industrial sites in the 5-20 acre range, but needs only 12 of these, leaving a surplus of 6 sites.

Table 5-1 also shows that Springfield has 4 buildable commercial sites in the 5-20 acre range, but needs 8 of these, and so has a deficit of 4 sites.

[3] See Attachment 7 for aerial map and taxlot data.

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.

There is nothing wrong with this initial determination. The problem is that the city skipped over the next step in the process, and jumped directly to a conclusion that the identified deficit of 4 commercial sites in the 5-20 acre range could only be remedied by expansion of the UGB.

Goal 14 and its administrative rules require that each of the existing 18 buildable industrial sites in the 5-20 acre size class first be assessed to determine whether any could be re-designated to meet the commercial deficit:

> "Prior to expanding the UGB, a local government must demonstrate that the estimated needs cannot reasonably be accommodated on land already inside the UGB." (OAR 660-024-0050(4))

Even though some of these 18 industrial sites might not be appropriate for commercial use, many probably are suitable. This is especially true since the summary Table 5-5 on page 84 shows there are no significant differences between the EOA's site characteristics for industrial and commercial targeted industries on sites larger than 5 acres.

In addition, the UGB expansion areas are not divided into dedicated commercial vs. industrial sections. Instead, a generic employment land designation would be applied to all the land, with the final plan designation determined by future planning actions. As the staff report explains:

> "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." (Staff report, pg. 89)

Based on these facts, it seems clear that the city considers large commercial and industrial sites for its targeted industries to be essentially interchangeable. Thus, the identified deficit of 4 commercial sites in the 5-20 acre range could be easily met by strategic re-designation of 4 of the 18 inventoried industrial sites. Since there is currently a surplus of 6 such sites, the re-designation would still leave the city with a surplus of 2 additional industrial sites.

3. Failure to inventory all existing 20+ acre sites

An accurate inventory of all vacant and redevelopable sites is a critical part of any UGB evaluation. It appears that several 20+ acre sites were not captured by the city's inventory.

The above Table 5-1 states that Springfield has no vacant commercial or industrial sites in the 20+ acre size class, and has only one re-developable site. It seems clear that this re-developable site is Jasper Natron taxlot 1802100000200, which is depicted on page 33 of the EOA. The staff report explains that it was inventoried as a 20+ acre site:

> "The largest potentially redevelopable site is a 47-acre parcel in the Jasper-Natron Special Heavy Industrial District (Taxlot: 1802100000200. This site has approximately 36 acres of unconstrained land * * * The City reasoned that this site could provide one of the City's needed sites 20 acres and larger." (Staff report, pg. 69-70)

We agree that this is a 20+ acre site. However, we found four other employment sites that appear to contain 20+ acres of buildable land, yet do not appear in that category on the city's inventory. They are:

Wildish site, Glenwood area

The "Wildish site" is a 31-acre parcel in the Glenwood area of Springfield, located on the west bank of the Willamette River. It is depicted as a Light Medium Industrial vacant site (light pink color) in the lower left corner of Map 2-3 on page 24 of the EOA. Below is a close up view of that part of Map 2-3 alongside an aerial map showing the lot boundaries.[4]

[4] Also see Attachment 8, a printout from Lane County's taxlot mapping system showing that the parcel is 31.27 acres, including the building. The building is in the "notch" that is missing from the site on Map 2-3. The notch area appears to be about 2 acres in size, so the actual vacant buildable area is somewhere between 25 and 30 acres.

A review of the current FEMA flood map (Attachment 9) shows that virtually none of this parcel is within the floodway. Some areas are within the floodplain, but the EOA does not consider that to be a prohibitive constraint. In fact, the entire proposed Gateway expansion area is within the floodplain. The FEMA map also includes topography; the site is nearly level with only a few feet of difference from one end to the other. Finally, the Glenwood Local Wetlands Inventory (Attachment 10) shows there are no delineated wetlands on the site. Therefore, there appear to be no constraints that would reduce the buildable portion of this site below 20 acres.

In 2012, the Wildish site was re-designated as "Employment Mixed Use" by the Glenwood Refinement Plan adopted as Springfield Ordinance 6279. That designation preserved this site's status as an important 20+ acre employment site included in Springfield's Commercial and Industrial Buildable Lands Inventory (CIBL). Ordinance 6279's findings stated that the Wildish property is a 20+ acre employment site requiring protection from future land divisions:

> "The proposed Glenwood Refinement Plan Housing and Economic Development Chapter, Economic Development Section states: 'Nearly all parcels in the Glenwood Riverfront are classified in the CIBL as vacant or potentially redevelopable industrial, commercial, and mixed-use sites. The proposed plan designations for the Glenwood Riverfront, as described in the Land Use and Built Form Chapter, will result in vacant and redevelopable parcels in the Glenwood Riverfront contributing to Springfield's commercial and industrial buildable lands supply.... There is a citywide deficit of industrial parcels greater than 20 acres, and there is a deficit of commercial and mixed-use parcels greater than 1 acre. Therefore, parcels sized in these categories must be

maintained or increased (through parcel consolidation) to preserve the commercial and industrial land supply.' ***The limitation on land divisions is necessary to protect commercial and industrial land of both small and large (20 or more acres, for example the Wildish property)*** acreages as specified in CIBL." (Springfield Ord. 6279, Exhibit A-40, emphasis added)

Given the above information, we cannot understand why the Wildish site was not included in the inventory as a 20+ acre site. If it was deemed to have less than 20 acres, and hence was inventoried as only a 5-20 acre site, that would appear to have been an error. Based on what we know, we think it should be inventoried as either a commercial or an industrial 20+ acre site, and the UGB expansion reduced accordingly. If the city has evidence to the contrary, we would appreciate a chance to review that information and modify our testimony.

Brand S Road, Jasper-Natron area

The EOA evaluated a 29-acre mill site on Brand S Road in the Jasper-Natron area (taxlot 1802100000900) for redevelopment potential, and concluded it had none:

> "The site has more than 24 acres of unconstrained land. 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." (EOA, pg. 36)

Since the inventory was performed many years ago, we are unsure if the city realizes that recently, nearly all the buildings on this site were demolished. As shown on the county tax printout (Attachment 11), the real market value of the site's improvements was reduced from $236,570 in 2014 to $27,470 in 2015. The remaining structure appears to be a small outbuilding in the southwest corner, an area that is separated from the rest of the parcel by Brand S Road.

It is evident from the below aerial photo that the other buildings have been torn down to the ground, and the debris has been removed. Therefore, the site is now ready for redevelopment, and so must be counted as a 20+ acre site in the inventory.

Marcola Meadows

Marcola Meadows is a 100-acre master planned site that is depicted with an orange color near the center of Map 2-2 on page 20 of the EOA. Below is an aerial view of the site.

The EOA states that it inventoried the 44-acre portion that would contain employment uses:

> "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." (EOA, pg. 19)
>
> "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." (EOA, pg.74)

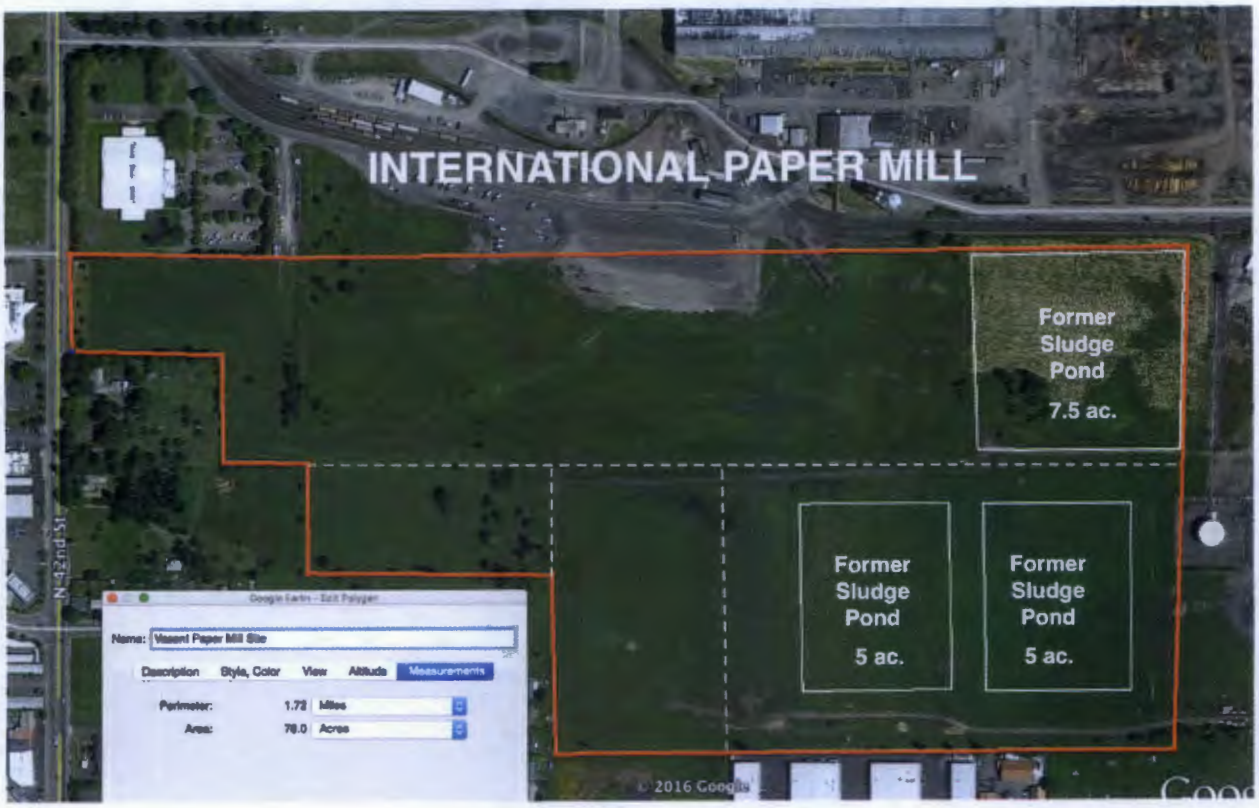
Since Marcola Meadows will accommodate well over 20 acres of commercial uses, we do not understand why this site wasn't inventoried as a 20+ acre site. Either the inventory should be amended to include Marcola Meadows in the count of 20+ acre sites, or additional evidence and findings should explain why it cannot provide such a site.

<u>International Paper</u>

The International Paper ownership is hundreds of acres in size and spans several adjacent lots. The entire complex is shown on the attached aerial photo (Attachment 12). The southern part of this ownership – which is at least 75 acres in size – has no improvements and is not being used in conjunction with the paper mill operation; it is a grass field. However, the site has not been included in the city's inventory of 20+ acre sites.

This southern portion is made up of four lots. Three are vacant; these are approximately 5, 10, and 25 acres in size. The fourth lot contains 117 acres, and has improvements in its northern portion. The lot boundaries and sizes are depicted on the printouts from Lane County's taxlot mapping system (Attachment 13). The printouts also establish the common ownership of all four lots and the lack of any improvements on the three smaller lots.

Below is a recent Google Earth image of the portion of the paper mill ownership that we think should have been inventoried as a 20+ acre site. The Google measurement box shows that the polygon outlined in red contains almost 80 acres. The approximate internal lot lines are shown as dashed white lines, and the location of three former paper mill sludge ponds are shown as solid white lines. The northern part of this area is the vacant portion of the 117-acre lot (roughly 40 acres); the three smaller lots to the south are entirely vacant (they are 5, 10 and 25 acres, for a total of another 40 acres).



The redevelopment potential of the partially developed 117-acre lot is discussed on page 36 of the EOA. Despite the absence of improvements on the 40-acre southern portion, it was determined to have no capacity because, "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."

Because the record does not explain how individual lots were inventoried, we cannot determine how the three vacant lots were classified. Were they correctly considered to be one 40-acre site, since they have common ownership? Or was each lot erroneously considered to be a separate site? As best we can ascertain, the EOA's Map 2-4 is the only place that gives any indication of which land was inventoried, and what constraints exist.[5] A close up of the relevant part of Map 2-4 is reproduced below; the three vacant lots are in the purple area.

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[5] We have asked staff for taxlot specific information, and were told that the information is only available in the form of a Microsoft Access database, and that it would require a public information request to obtain. We do not understand how Map 2-4 could be sufficient to comply with the Goal 9 rule's inventory requirements. For example, it is not possible to determine the site characteristics that each site has, because the size is not provided for any individual lot or aggregations thereof. OAR 660-009-0015(3) requires that information:

> "(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;"

The former sludge ponds are marked light blue with green diagonal stripes; the map's legend says that color indicates "Wetlands." These are not natural wetlands; the ponds were mapped as "Other Waters" on the city's wetlands inventory in the 1990s (Attachment 14), when they apparently still contained water. Today, however, the ponds have been abandoned and now are grass fields.

The former pond areas contain little to no hydric soil (one of the distinguishing features of wetlands), as illustrated by soils data on the county printout for the 25-acre taxlot that contains the two southern ponds (Attachment 13). Therefore, it seems unlikely that any substantial parts of these areas are still bona fide jurisdictional wetlands, now that the ponds have been drained. In fact, former sludge ponds are generally viewed as potential brownfields needing environmental remediation, and are often excellent candidates for redevelopment.

Even assuming that the entire area of the former sludge ponds are jurisdictional wetlands unusable for any purpose, there would still be 30 acres of vacant buildable land in the three vacant lots alone – they contain 40 acres of land, with at most, 10 acres of wetlands. Therefore, no matter how the partially developed 117-acre lot is evaluated, we think that at the very least, these three vacant lots should be inventoried as a 20+ acre site.

Regarding the exclusion of the vacant portion of the partially developed 117-acre lot, we have considered the explanation provided by the city on page 36 of the EOA: "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."

We are unsure if the city erroneously believes that this unimproved portion is still being actively used by the mill. Alternatively, perhaps the city does realize the southern portion is not being used, but believes that since the northern portion ***is*** being used, the entire lot should be excluded from inventory. Or, the city may believe that this site should not be counted because the paper mill might start using it in the future.

Even if the paper mill is the most likely future user of this site, and not some other employer, that would not diminish its future employment capacity. Any jobs created by the paper mill in a

future expansion onto this site would meet Springfield's employment needs just as well as any other newly created jobs. The employment forecast and land need determination do not differentiate between new jobs added by existing employers and jobs created by new firms. It doesn't make sense to ignore obvious buildable capacity that is already served with infrastructure, and expand the UGB to address a perceived land shortage that doesn't really exist.

For all the reasons above, we think that the International Paper ownership contains a minimum of 30 buildable acres on the three vacant lots, and at maximum, up to 75 acres across all four lots. The exact amount depends on the regulatory status of the former sludge ponds and the treatment of the 117-acre partially developed site. Either way, this is a 20+ acre site, and should be included in the city's inventory as such.

4. Goal 9 rule requires unimproved log storage yards to be inventoried as vacant

The Sundance lumber mill sits on one lot, but it stores logs on three adjacent lots that together comprise about 14 acres. All four lots are depicted below. The tax printouts (Attachment 15) show the only permanent improvements are on the lot where the mill itself sits.

Per the Goal 9 rule, these three unimproved lots must be inventoried as vacant land:

"'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." (OAR 660-009-0005(14))

Despite the reality that some businesses do use adjacent vacant lots to store their materials or products, there is no provision in the current Goal 9 rule for excluding such lots from inventory. This situation was considered during LCDC's 2014 review of the Newberg UGB expansion. In its review, the Commission determined that a vacant lot used to site dumpsters by a waste disposal company had to be considered vacant; the same is true with these three log storage lots.

If the Goal 9 rule is ever revised in the future (and we think it badly needs to be), we would support changes to better capture the employment capacity of both vacant and improved sites. However, until that happens, the rule should be followed. The three adjacent lots contain a total of about 14 acres, and so should be added to the inventory as one additional 5-20 acre site.

Conclusion

To summarize our testimony:

a) There is no relevant evidence supporting the city's claim that its need for 20+ acre employment sites can only be met by sites that average 60+ acres in size.

b) There is no evidence or findings demonstrating that the city's need for four additional 5-20 acre commercial sites cannot be met via re-designation of surplus industrial sites.

c) There are as many as four additional 20+ acre employment sites that were not included in the city's inventory.

d) There is an additional 5-20 acre site that was not included in the city's inventory.

Taken together, these problems significantly overstate the city's need for UGB expansion. Once they are corrected, the need to expand for employment uses will be substantially reduced, and possibly even eliminated.

If, after addressing these concerns, there still remains a need for additional 20+ acre sites, we would support the proposed Mill Race UGB expansion, which would provide 125 unconstrained buildable acres, including two sites that are 20+ acres in size. Most of the Mill Race area is out of the floodplain. In addition, it was determined to be the least expensive candidate expansion area to serve by the *UGB Study Areas Serviceability and Cost Analysis*, which was presented to the Springfield City Council on April 28, 2014. The Mill Race would cost far less to serve than the Gateway area, yet would provide roughly the same amount of buildable land.

Regarding the handful of smaller properties in the Mill Race expansion area, we can accept staff's recommendation that these should also be included in the UGB, despite the lack of

demonstrated need. Page 151 of the staff reports explain that these small parcels "would likely provide future access and services to the suitable large parcels," and also that excluding this area would leave it stranded as an island surrounded by all sides by urbanized land, leaving a "donut hole in the donut" of the Metro Plan Boundary.

However, we cannot support any part of the Gateway expansion. The entire area is within the floodplain, and much of it is environmentally sensitive. Springfield's own staff have cautioned that pending regulatory changes may make development of this area infeasible. According to the city's 2014 *UGB Study Areas Serviceability and Cost Analysis,* the cost to provide services to this area exceeds $125 million. This seems likely to be a terrible investment, in light of these additional regulations and subsequent reduction in buildable area.

The portions of the Gateway expansion area that are not wetland, riparian area or sloped are predominantly Class 2 farmland, and are currently making a valuable contribution to Lane County's rural economy. Given the substantial financial and regulatory barriers to development, farming is likely the highest and best long-term use for this area. We ask that the city and county not approve the Gateway expansion, and instead retain the existing agricultural designation.

In addition, we urge the city to rethink its reliance on UGB expansions to provide future employment capacity. The tremendous cost of extending infrastructure to the urban fringe would have city-wide ramifications. Since it does not appear likely that landowners could pay their own way (the city's cost estimate for the Gateway improvements is about $100,000 per useable acre, possibly more than the finished land would be worth), SDCs would probably need to be substantially increased in order to service the new land. This would be a hidden subsidy, paid by every homebuilder and business creating new housing and employment anywhere in the city.

Beyond these cost concerns, a large supply of new urbanizable land outside the current UGB will harm Springfield's efforts to revitalize and redevelop downtown, Glenwood, and other areas like East Main Street. It will also undercut urban property owners who have already invested heavily in their land and buildings, and who may have spent decades faithfully paying taxes to the city.

A more compact UGB would better support Springfield's existing stakeholders, reduce commute times and transportation costs for Springfield residents, and better meet coming greenhouse gas reduction targets. All these things support values nearly everyone cares about: fairness, a higher quality of life, better affordability and a healthier environment.

Sincerely,

Mia Nelson
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Attachments:

1- Sierrapine mill tax printout
2- International Paper tax printout
3- Swanson mill tax printout
4- Rosboro mill tax printout
5- High Banks warehouse tax printout
6- True Value warehouse tax printout
7- Gateway mall tax printout
8- Wildish site tax printout
9- Wildish site FEMA map
10- Glenwood LWI (2 pg.)
11- Brand S Road tax printout
12- International Paper aerial map
13- International Paper taxlot printouts (5 pg.)
14- International Paper wetlands map
15- Sundance mill tax printouts (5 pg.)