Ordinance 6361, Exhibit F

Springfield 2030 Plan Amendments
Staff Report and Findings[1]

December 5, 2016

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1: This document reflects corrections of obvious scrivener's errors in the original, adopted version.

Staff Report and Findings

Springfield 2030 Metro Plan Amendments

December 5, 2016

Co-applicants:	**Local File Numbers:**
City of Springfield Lane County	Springfield File Nos. LRP 2009-00014, TYP 413-00007 Lane County File Nos. PA 509-PA13-05393
Request: Amend the Eugene-Springfield Metropolitan Area General Plan (*Metro Plan*) to adopt the Springfield 2030 UGB amendment; assign plan designations and zoning to newly urbanizable lands; adopt Springfield 2030 Comprehensive Plan Economic and Urbanization policy elements and implementing zoning to establish Springfield's employment land supply for the planning period 2010-2030. Metro Plan Type II Amendment	**Procedure Type:** This proposal contains an amendment of the UGB by a city with a population of 2,500 or more that adds more than 50 acres. Pursuant to ORS 197.626 (1)(b), OAR 660-024-0080, OAR 660-025-0175, and ORS 197.610 reviewed by LCDC OAR 660-025-0175 (1)(b), the 2030 Plan amendments are submitted to the Department and Commission for review for compliance with the applicable statewide planning goals, statutes and rules. The proposal was initiated on December 31, 2009 and was prepared to address the requirements of the applicable statutes and rules in effect at that time, including • ORS 197.298 • HB 4126 • Goal 14 ef. April 28, 2006 OAR 660-015-0000(14) • Division 24 Urban Growth Boundaries cert. ef. 4-16-09 TYP 413-00007 (Agriculture Zoning District) was initiated on November 14, 2013

I. Nature of the Plan Amendment Request

The City of Springfield and Lane County seek approval of Springfield's evaluation of employment land needs for the planning period 2010-2030. ORS 197.304 (HB 3337) required the establishment of separate Urban Growth Boundaries (UGBs) for Eugene and Springfield and was the impetus for initiating Springfield's 2030 comprehensive planning work. Springfield's current UGB was acknowledged in 2011 to provide land to meet the city's housing needs for the planning period. All of Springfield's 2010-2030 residential growth needs were met without expanding the UGB — through re-designation of land in the Glenwood redevelopment area and other efficiency measures.

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

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

- Adopt Exhibit C-1 Springfield 2030 Comprehensive Plan Urbanization Element as Springfield's comprehensive plan in compliance with Statewide Planning Goal 14, Urbanization. The Urbanization Element contains Springfield's city-specific goals, policies, implementation measures and findings to address land needs for the planning period 2010-2030, replacing *Metro Plan* Urbanization and Growth Management policies applicable to lands within Springfield's jurisdictional area;

- Adopt Exhibit C-1 and C-2 amending Springfield Urban Growth Boundary (UGB),[1] Springfield UGB map and UGB Technical Supplement depicting and describing the UGB. Amend Metro Plan Boundary to be coterminous with the UGB. (Lane County will amend the Lane County Rural Comprehensive Plan (RCP) boundary to be coterminous with the UGB and Metro Plan Boundary to reflect the boundary change.)
    - Expands the Springfield UGB to add approximately 257 suitable acres of employment land on 273 gross acres in two expansion areas – North Gateway and Mill Race.
    - Expands the Springfield UGB to include approximately 455 acres of existing public land, parks and open space.

- Adopt Exhibit D amending Metro Plan text:
    - Amend Chapter II, Section C Metro Plan Growth Management Goals, Findings, and Policies to add the following paragraph: "Sub-chapter II-C no longer applies to Springfield. In 2016, the City of Springfield and Lane County adopted the Springfield 2030 Comprehensive Plan Urbanization Element, Ordinance No. 6361 and Lane County Ordinance No.PA1304, as Springfield's comprehensive plan in compliance with Statewide Planning Goal 14, Urbanization. The

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

Urbanization Element contains Springfield's city-specific goals, policies, implementation measures and findings to address land needs for the planning period 2010-2030."

- Amend Chapter II, Section E Metro Plan Urban and Urbanizable Land to add the following paragraph: "Sub-chapter II-E no longer applies to Springfield. In 2016, the City of Springfield and Lane County adopted the Springfield 2030 Comprehensive Plan Urbanization Element, Ordinance No. 6361 and Lane County Ordinance No. PA1304, as Springfield's comprehensive plan in compliance with Statewide Planning Goal 14, Urbanization. The Urbanization Element contains Springfield's city-specific goals, policies, implementation measures and findings to address land needs for the planning period 2010-2030."

- Amend Metro Plan Chapter III, Section B Metro Plan Economic Element to add the following paragraph: "Sub-chapter III-B no longer applies to Springfield. In 2016, the City of Springfield and Lane County adopted the Springfield 2030 Comprehensive Plan Economic Element, Ordinance No. 6361 and Lane County Ordinance No. PA1304, as Springfield's comprehensive plan in compliance with Statewide Planning Goal 9, Economic Development. The Economic Element contains city-specific goals, policies, implementation measures and findings to address Springfield's land needs for economic development and employment growth for the 2010-2030 planning period."

- Amend Metro Plan Chapter II, Section G Land Use Designations to add a new land use designation applicable to Springfield's jurisdictional area of responsibility — the Urban Holding Area-Employment (UHA-E) plan designation;

- Amend Metro Plan Chapter II, Section G. Metro Plan Land Use Special Heavy Industrial designation page II-G-8 to delete the Springfield-specific reference to the Natron Special Heavy Industrial (SHI) site; and

- Amend Metro Plan Chapter II, Section G, footnotes 11 and 12, to add references to the subject UGB amendment ordinance.

- Amend Metro Plan Preface to correct scrivener's error in ordinance numbers at end of preface and adds text to identify significant plan amendments, and adopted elements of Springfield's city-specific comprehensive plan.

- Adopt Exhibit A amending Metro Plan Diagram[2] to assign Metro Plan designations to lands added to the UGB:
    - Assign the "Urban Holding Area – Employment" (UHA-E) Metro plan designation to approximately 273 acres to meet Springfield's long range employment land need for 7 employment sites on 223 suitable unconstrained acres;

    - Assign the "Natural Resource" (NR) Metro plan designation to approximately 53 acres of land within the McKenzie River Floodway in the North Gateway area;

    - Assign the "Public/Semi Public" (P/SP) Metro plan designation to approximately 455 acres of existing publicly-owned land, parks and open space.

- Adopt Exhibit E amending Springfield Development Code Chapter 3 Land Use Districts establishing Section 3.2-900 Agriculture—Urban Holding Area (AG) Zoning District to implement the Urban Holding Area – Employment plan designation and Natural Resource plan designation.

- Adopt Exhibit A-3 amending Springfield Zoning Map to assign Springfield zoning to lands added to UGB
    - Assign Agriculture—Urban Holding Area Zoning District to lands designated Urban Holding Area- Employment (UHA-E) and Natural Resource (NR);
    - Assign Public Land and Open Space (PLO) Zoning District to lands designated Public/Semi Public.

This proposal also requires concurrent actions by Lane County to amend the Lane County Rural Comprehensive Plan. These actions are addressed in Lane County's staff report File Nos. PA1341 and 16-05:

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

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

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The proposed 2030 Plan amendments (2030 Plan) implement ORS 197.707 *"to enhance economic development and opportunity for the benefit of all citizens"*; and the Land Conservation and Development Commission's requirements for comprehensive plans pursuant to ORS 197.712: *"in carrying out statewide comprehensive land use planning, the provision of adequate opportunities for a variety of economic activities throughout the state is vital to the health, welfare and prosperity of all the people of the state."*

The 2030 Plan addresses the comprehensive planning requirements in ORS 197.712(2)(a)-(d) by adopting city-specific comprehensive plan elements including: (a) the Springfield Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis — the required analysis of Springfield's economic patterns, potentialities, strengths and deficiencies as they relate to state and national trends; (b) the Springfield 2030 Comprehensive Plan Economic Element — containing the City's policies concerning the economic development opportunities in the community; (c) & (d) the Springfield 2030 Comprehensive Plan Urbanization Element — containing policies, UGB Amendment, plan designations and implementing land use regulations to provide for at least an adequate 20-year supply of sites and suitable sizes, types, locations and service levels for industrial and commercial uses consistent with plan policies. As allowed by ORS 197.712(2)(g)(B), the 2030 Plan proposes a modest change to the Springfield UGB to provide reasonable opportunities for urban commercial and industrial needs over time. The City's findings under Goals 11, 12 and 14 address the required coordination with public facilities and transportation planning.

The 2030 Plan UGB amendment, plan policies, plan designations and land use regulations implement Goal 14 Urbanization by providing urbanizable[3] land in the Springfield UGB designated for urban development needs — based on a demonstrated need for employment opportunities, livability, public facilities, parks and open space for the planning period 2010-2030. The 2030 Plan identifies Springfield's economic development objectives, provides public policies to support desired outcomes, and designates a 20-year supply of suitable employment land with specific site characteristics to meet identified needs. Prior to expanding the UGB, the City conducted the thorough and complete inventory and analysis required by Goal 9 administrative rules to demonstrate that all land needs cannot reasonably be accommodated on land already inside the UGB. [OAR 660-015-0000(14)

II. Background

Requirements for land use planning within the Eugene-Springfield Metro area were established in 2007 when the Oregon Legislature adopted House Bill 3337. ORS 197.304 (Lane County accommodation of needed housing) established a mandate requiring Springfield to determine its population's 20-year need for housing separately from Eugene and to establish a Springfield Urban Growth Boundary (UGB) to designate land to meet housing needs. Although the text of ORS 197.304 refers only to the cities' accommodation of residential land needs, the requirement for separate UGBs carries with it the implicit need for the cities to independently plan for other land needs as well, including employment growth needs, as defined by Goal 9.

Evaluation of Land Needs for 2010-2030 Planning Period. As described above, the first step to begin this compliance process was to adopt separate population forecasts into the Metro Plan (acknowledged in 2010) in order to establish the 20-year population to be used in the 2030 Plan. In 2007, Springfield began concurrent land studies (Residential Land Study and Commercial and Industrial Lands Study) to evaluate Springfield's jurisdictional area of the Metro UGB for 2010-2030 housing and employment needs. The City commenced the Springfield 2030 Plan's planning period on year 2010 to 1) mesh seamlessly with the County's adopted coordinated population forecast period; 2) to meet the City's obligation to complete the housing inventory, analysis and determination before January 1, 2010, and 3) to closely coordinate Springfield's residential and commercial and industrial land inventories and analyses processes — that would serve as the factual bases for the Springfield UGB and respective Springfield 2030 Comprehensive Plan policy elements. The planning period 2010-2030 is consistent with the requirements of OAR 660-024-0040(2)(a) and (b).

[3] Goal 14: *"**Urbanizable Land.** Land within urban growth boundaries shall be considered available for urban development consistent with plans for the provision of urban facilities and services. Comprehensive plans and implementing measures shall manage the use and division of urbanizable land to maintain its potential for planned urban development until appropriate public facilities and services are available or planned.* [OAR 660-015-0000(14)]

Initiation of Springfield 2030 Plan Post Acknowledgement Plan and UGB Amendments. The City and Lane County jointly submitted Notice of a Proposed Change to a Comprehensive Plan or Land Use Regulation as described in OAR 660-018-0020 and OAR 660-018-0021 concerning the evaluation or amendment of the Springfield UGB to DLCD on December 31, 2009. The first evidentiary hearing was conducted jointly by the Springfield and Lane County Planning Commissions beginning on February 17, 2010 and closing on May 4, 2010. The Notice was submitted to DLCD more than 45 days prior to the hearing.

Applicability of Division 24 Rule to Springfield UGB Amendment. In 2016 HB 4126 was enacted to allow cities like Springfield that had already initiated a UGB amendment, to continue to use the administrative rules in effect at the time of initiation. Also, subsequent to initiation of the amendment, and subsequent to the first evidentiary hearing on the amendments, the Oregon legislature adopted new rules to "clarify procedures and requirements of Goal 14 regarding a local government adoption or amendment of an urban growth boundary (UGB)." Those rules went into effect January 1, 2016 and included the following provision exempting cities who had initiated UGB amendments prior to that effective date.

HB 4126 states:

> *"Notwithstanding ORS 197A.320, a city outside of Metro that submitted to the Director of the Department of Land Conservation and Development, pursuant to ORS 197.610, a proposed change to an acknowledged comprehensive plan or a land use regulation that included an evaluation or an amendment of its urban growth boundary, or that received approval of a periodic review work program that included a work task to amend or evaluate its urban growth boundary pursuant to ORS 197.633, prior to January 1, 2016, but did not complete the evaluation or amendment of its urban growth boundary prior to January 1, 2016 may complete the evaluation or amendment pursuant to statutes and administrative rules in effect on June 30, 2013."*

OAR 660-024-0000(4) states:

> *"The rules in this division adopted on December 4, 2015, are effective January 1, 2016, except that a local government may choose to not apply the amendments to rules in this division adopted December 4, 2015 to a plan amendment concerning the amendment of a UGB, regardless of the date of that amendment, if the local government initiated the amendment of the UGB prior to January 1, 2016."*

OAR 660-024-0000 (3)(b) states:

> *"For purposes of this rule, "initiated" means that the local government either:*
>
> *(A) Issued the public notice specified in OAR 660-018-0020 for the proposed plan amendment concerning the evaluation or amendment of the UGB; or*

(B) Received LCDC approval of a periodic review work program that includes a work task to evaluate the UGB land supply or amend the UGB;

(c) A local government choice whether to apply this division must include the entire division and may not differ with respect to individual rules in the division."

The City and Lane County initiated amendment of the UGB as described in OAR 660-024-000 (3)(b)(A) and as defined in OAR 660-018-0020 prior to January 1, 2016, thus the City may choose to not apply the amendments to rules in division 24 adopted December 4, 2015 to its plan amendment concerning the amendment of a UGB. The City chose to complete its UGB amendment process under the rules in effect prior to January 1, 2016.

2030 Plan Phased Adoption Process/ 2011 Acknowledgement of Springfield UGB and Goal 10 Housing Element (ORS 197.296). Given the complexity of actions involved in the 2030 Plan proposals and the need for timely compliance with ORS 197.304[4], Springfield chose to phase adoption of the 2030 Plan amendments. On June 20, 2011, Springfield and Lane County co-adopted amendments to the Eugene-Springfield Metro Plan (Springfield Ordinance 6268, Lane County Ordinance PA 09-6018) — the Springfield 2030 Refinement Plan Residential Land Use and Housing Element and its Technical Supplement Residential Land Use and Housing Needs Analysis (RLHNA) and a separate Springfield Urban Growth Boundary pursuant to ORS 197.304 Lane County accommodation of needed housing. The amendments were acknowledged on August 9, 2011.[5] Prior to that action, Springfield shared a UGB with Eugene.

Springfield's 2010-2030 Residential Growth needs were met without expanding the UGB, by adopting residential land efficiency measures into the City's Development Code and by redesignating land for High Density Residential (HDR) mixed-use purposes to meet the identified HDR deficit. Springfield's current UGB is based on the adopted 20-year population forecast for the urban area described in OAR 660-024-0030. Springfield's current UGB did not address employment land needs for the 2010-2030 planning period. The subject proposal seeks approval for its evaluation of land needed for employment.

IIa. Procedural Requirements for Processing UGB Amendments

The following section of this report demonstrates compliance with the applicable procedural requirements.

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[4] The adoption of the Springfield UGB pursuant to ORS 197.304(1)(a), and a Buildable Land Inventory and Housing Needs Analysis pursuant to ORS 197.304(1)(b), came under the "notwithstanding clause" of ORS 197.304(1), which provides:
"Notwithstanding an intergovernmental agreement pursuant to ORS 190.003 to 190.130 or acknowledged comprehensive plan provisions to the contrary, [Springfield] shall meet its obligation under ORS 197.295 to 197.314 separately from any other city within Lane County."

[5] DLCD Notice of Adopted Amendment, DLCD File Number 012-09, July 5, 2011.

ORS 197.626(1)(b) LCDC Review Required for UGB Amendments

> *(1) A local government shall submit for review and the Land Conservation and Development Commission shall review the following final land use decisions in the manner provided for review of a work task under ORS 197.633 (Two phases of periodic review):*
>
> *(b) An amendment of an urban growth boundary by a city with a population of 2,500 or more within its urban growth boundary that adds more than 50 acres to the area within the urban growth boundary;*

Springfield — a city with a population of 2,500 or more — submitted a land use proposal that adds 792.5 acres — more than 50 acres — to the area within the urban growth boundary. Therefore, the UGB amendment is subject to ORS 197.626 (1)(b) and reviewed by LCDC. A final order of the commission under this section may be appealed to the Court of Appeals in the manner described in ORS 197.650 (Appeal to Court of Appeals) and 197.651 (Appeal to Court of Appeals for judicial review of final order of Land Conservation and Development Commission).

OAR 660-024-0080 LCDC Review Required for UGB Amendments

> *"A metropolitan service district that amends its UGB to include more than 100 acres, or a city with a population of 2,500 or more within its UGB that amends the UGB to include more than 50 acres shall submit the amendment to the Commission in the manner provided for periodic review under ORS 197.628 to 197.650 and OAR 660-025-0175."*

Springfield's proposal is a post-acknowledgement plan amendment of the Eugene-Springfield Metropolitan Area General Plan that is "reviewed in the manner of periodic review" because it includes a UGB amendment larger than 50 acres. Springfield and Eugene staff met with former DLCD Director Richard Whitman and DLCD staff several times between 2009 and 2010 to discuss how the cities would respond to the ORS 197.304 mandate to adopt separate urban growth boundaries and to confirm the Department's acceptance of the approach to be taken by both cities to establish and amend UGBs, consistent with each city's jurisdictional area of responsibility as specified in the acknowledged Metro Plan. Between 2013 and 2015 City planning staff met with DLCD staff to confirm that submittal of the subject proposal is not subject to periodic review work task submittal requirements and provisions of the statutes or administrative rules applicable only to the periodic review process.

660-025-0175 Review of UGB Amendments and Urban Reserve Area Designations

> *"(1) A local government must submit the following land use decisions to the department for review for compliance with the applicable statewide planning goals, statutes and rules in the manner provided for review of a work task under ORS 197.633:*

(b) An amendment of an urban growth boundary by a city with a population of 2,500 or more within its urban growth boundary that adds more than 50 acres to the area within the urban growth boundary;

(2) The standards and procedures in this rule govern the local government process and submittal, and department and commission review.

(3) The local government must provide notice of the proposed amendment according to the procedures and requirements for post-acknowledgement plan amendments in ORS 197.610 and OAR 660-018-0020.

(4) The local government must submit its final decision amending its urban growth boundary, or designating urban reserve areas, to the department according to all the requirements for a work task submittal in OAR 660-025-0130 and 660-025-0140.

(5) Department and commission review and decision on the submittal from the local government must follow the procedures and requirements for review and decision of a work task submittal in OAR 660-025-0085, and 660-025-0140 to 660-025-0160."

The Springfield 2030 Plan proposal contains an amendment of the UGB by a city with a population of 2,500 or more that adds more than 50 acres. Pursuant to OAR 660-025-0175, the UGB Amendment proposal is submitted to the Department and Commission for review for compliance with the applicable statewide planning goals, statutes and rules in the manner provided for review of UGB amendments.

ORS 197.610 Submission of proposed comprehensive plan or land use regulation changes to Department of Land Conservation and Development

"(1) Before a local government adopts a change, including additions and deletions, to an acknowledged comprehensive plan or a land use regulation, the local government shall submit the proposed change to the Director of the Department of Land Conservation and Development. The Land Conservation and Development Commission shall specify, by rule, the deadline for submitting proposed changes, but in all cases the proposed change must be submitted at least 20 days before the local government holds the first evidentiary hearing on adoption of the proposed change. The commission may not require a local government to submit the proposed change more than 35 days before the first evidentiary hearing.

(3) Submission of the proposed change must include all of the following materials:

(a) The text of the proposed change to the comprehensive plan or land use regulation implementing the plan;

(b) If a comprehensive plan map or zoning map is created or altered by the proposed change, a copy of the map that is created or altered;

(c) A brief narrative summary of the proposed change and any supplemental information that the local government believes may be useful to inform the director or members of the public of the effect of the proposed change;

(d) The date set for the first evidentiary hearing;"

Springfield's proposal includes comprehensive plan and land use regulation changes that are amendments to the acknowledged Eugene–Springfield Metro Plan, therefore the post-acknowledgement procedures of ORS 197.610 are applicable.

660-018-0020 Notice of a Proposed Change to a Comprehensive Plan or Land Use Regulation

"(1) Before a local government adopts a change to an acknowledged comprehensive plan or a land use regulation, unless circumstances described in OAR 660-018-0022 apply, the local government shall submit the proposed change to the department, including the information described in section (2) of this rule. The local government must submit the proposed change to the director at the department's Salem office at least 35 days before holding the first evidentiary hearing on adoption of the proposed change.
(2) The submittal must include applicable forms provided by the department, be in a format acceptable to the department, and include all of the following materials:
(a) The text of the proposed change to the comprehensive plan or land use regulation implementing the plan, as provided in section (3) of this rule;
(b) If a comprehensive plan map or zoning map is created or altered by the proposed change, a copy of the relevant portion of the map that is created or altered;
(c) A brief narrative summary of the proposed change and any supplemental information that the local government believes may be useful to inform the director and members of the public of the effect of the proposed change;
(d) The date set for the first evidentiary hearing;
(e) The notice or a draft of the notice required under ORS 197.763 regarding a quasi-judicial land use hearing, if applicable; and
(f) Any staff report on the proposed change or information that describes when the staff report will be available and how a copy may be obtained.
(3) The proposed text submitted to comply with subsection (2)(a) of this rule must include all of the proposed wording to be added to or deleted from the acknowledged plan or land use regulations. A general description of the proposal or its purpose, by itself, is not sufficient. For map changes, the material submitted to comply with Subsection (2)(b) must include a graphic depiction of the change; a legal description, tax

account number, address or similar general description, by itself, is not sufficient. If a goal exception is proposed, the submittal must include the proposed wording of the exception.
(4) If a local government proposes a change to an acknowledged comprehensive plan or a land use regulation solely for the purpose of conforming the plan and regulations to new requirements in a land use statute, statewide land use planning goal, or a rule implementing the statutes or goals, the local government may adopt such a change without holding a public hearing, notwithstanding contrary provisions of state and local law, provided:
(a) The local government provides notice to the department of the proposed change identifying it as a change described under this section, and includes the materials described in section (2) of this rule, 35 days before the proposed change is adopted by the local government, and
(b) The department confirms in writing prior to the adoption of the change that the only effect of the proposed change is to conform the comprehensive plan or the land use regulations to the new requirements.
(5) For purposes of computation of time for the 35-day notice under this rule and OAR 660-018-0035(1)(c), the proposed change is considered to have been "submitted" on the day that paper copies or an electronic file of the applicable notice forms and other documents required by section (2) this rule are received or, if mailed, on the date of mailing. The materials must be mailed to or received by the department at its Salem office."

Notice of the proposed 2030 Plan amendments was initially submitted to DLCD on December 31, 2009. The first evidentiary hearing was conducted jointly by the Springfield and Lane County Planning Commissions February 17-May 4, 2010.

Notice of the proposed AG Zone development code amendment (Ordinance Exhibit E) to implement 2030 Plan policies was submitted to DLCD on November 15, 2013. The first evidentiary hearing on the AG Zone was conducted by the Springfield Planning Commission on December 18, 2013. The Commission ordered a recommendation of approval to the Springfield City Council and Lane County Board, signed December 18, 2013.[6]

In addition to the applicable forms, the submittal included the text of the proposed wording of 2030 Plan Economic and Urbanization Element text; maps graphically depicting the proposed UGB amendment; proposed wording of AG zone land use regulations; the date set for the hearing; and description of the proposed change or information describing when the staff report would be available and how a copy could be obtained.

The City and Lane County submitted a revised Form 2 Notice of a Proposed Change to a Comprehensive Plan or Land Use Regulation to DLCD on date August 5, 2016.

[6] Springfield File No. TYP413-00007

In addition to the applicable forms, the revised submittal included the text of the proposed wording of 2030 Plan Economic and Urbanization Element text; proposed wording of Metro Plan text amendments; maps graphically depicting the proposed UGB amendment, Metro Plan designations and zoning map amendments; proposed wording of AG zone land use regulations; the date set for the final hearing; Exhibit F staff report describing the proposal and draft findings. The notice contained information describing when the staff report will be available and how a copy may be obtained.

The final public hearing was conducted jointly by the Springfield City Council, Lane County Board of Commissioners and Lane County Planning Commission on September 12, 2016.

The City and Lane County submitted the Form 4 Notice of Adopted Change to an Urban Growth Boundary to DLCD on February _____, 2017 after the amendment was adopted by the City of Springfield and Lane County. City and County ordinances were attached to DLCD Form 4.

The local record compiled after completion of the local adoption proceedings and closing of the record exceeds 2,000 pages. The submittal includes a detailed index listing all items in the local record and indicating whether or not the item is included in the submittal.

As required under OAR 660-025-0130, all items in the local record are made available for public review during the period for submitting objections under OAR 660-025-0140. The director or commission may require a local government to submit any materials from the local record not included in the initial submittal.

On February _____, 2017 the City mailed notice of the decision to a list of persons who participated in local hearings or requested notice of final decision in writing. The mailed notice used sample text provided for local government notice on page 3 of DLCD Form 4 "Sample Notice to Local Parties", and included the content required by OAR 660-025-0140.

The submittal includes a list of persons who participated in local hearings or requested notice of final decision in writing.

On February _____, 2017 the City and Lane County submitted the Form 4 Notice of Adopted Change to an Urban Growth Boundary that includes all materials listed on the Form 4 checklist, in compliance with OAR 660-025-0130.

Conclusion. The City and Lane County provided notice of the proposed UGB amendment according to the applicable procedures and requirements for UGB and comprehensive plan amendments.

IIb. Procedural Requirements for Processing City-specific *Metro Plan* Amendments

Procedural requirements for processing *Metro Plan* amendments are described in *Metro Plan* Chapter IV. The amendment procedures found in Chapter IV are implemented through each jurisdiction's local land use codes. Sections 5.2-115 Notice, 5.14-135 and 5.14-140 of the Springfield Development Code and Lane Code Sections 12.205 through 12.225 contain the amendment procedures and policies found in Chapter IV of the *Metro Plan*. Section 5.14-135 of the Springfield Development Code and Section 12.225 of the Lane Code have the same *Metro Plan* amendment criteria; consistency with the applicable Statewide Planning Goals and the proposed amendment cannot make the *Metro Plan* internally inconsistent. This staff report demonstrates that the Springfield UGB Amendment and 2030 Comprehensive Plan economic and urbanization policy elements are consistent with the applicable criteria by addressing the applicable Statewide Planning Goals.

Page iii of the Preface to the *Metro Plan* explains how Springfield, Eugene and Lane County are pursuing separate city specific comprehensive plans in order to comply with ORS 197.304. As each city develops its own city specific comprehensive plan, the *Metro Plan* will be amended several times to reflect the evolving extent to which it continues to apply to each jurisdiction. When Eugene or Springfield adopts a city-specific plan to independently address a planning responsibility that was previously addressed on a regional basis in the Metro Plan, that city will also amend the *Metro Plan* to specify which particular provisions of the Metro Plan will cease to apply within that city.

The Springfield UGB amendment and accompanying economic and urbanization elements do not make the Metro Plan internally inconsistent because this amendment also includes *Metro Plan* text amendments that inform the reader when a specific section of the Metro Plan no longer applies to Springfield because it has adopted a city specific comprehensive plan provision addressing that issue. Therefore, the Springfield UGB amendment is consistent with the *Metro Plan* amendment criteria set out in the Springfield Development Code and Lane Code that requires Metro Plan amendments to not make the *Metro Plan* internally inconsistent.

<u>Metro Plan amended to enable Springfield and Eugene comprehensive planning.</u> In 2014, the *Eugene-Springfield Metropolitan Area General Plan* (*Metro Plan*) text was amended to allow Metro jurisdictions the autonomy to make city-specific planning decisions. The amendments provide policy support for the ORS 197.304 mandate enabling Springfield and Eugene to take separate comprehensive planning actions to co-adopt (with Lane County) their respective Urban Growth Boundaries, land need determinations, comprehensive plan designations and policies. The "*Metro Plan* Enabling Amendments" were adopted by all three jurisdictions (Local file numbers Eugene: MA 14-2, Springfield: TYP414-00005, Lane Co: PA1313) and acknowledged by DLCD on December 5, 2014.

The amendments were prepared by the three Metro Plan partner jurisdictions in anticipation that Springfield and Eugene will eventually have their own city-specific comprehensive plans to address the aspects of land use planning that the cities conduct independently of one another (e.g. residential and employment land studies and policies). To support achievement of that those ends, the *Metro Plan* as revised in 2014 sets forth procedures for adopting city-specific plan changes — including UGB amendments — such as the subject proposal.

As required by Metro Plan IV-2, Policy 3, *"A proposed amendment to the Metro Plan shall be classified as a Type I, Type II or Type III amendment depending upon the number of governing bodies required to approve the decision."* The subject amendment of the Metro Plan is processed as a Type II Amendment requiring approval by Springfield and Lane County, as described in Metro Plan page IV-2, Policy 5A and b:

> *"A Type II Amendment requires approval by two governing bodies. The governing bodies in a Type II are the home city and Lane County. Eugene is the home city for amendments west of I-5, and Springfield is the home city for amendments east of I-5:*
>
> *a. Type II Diagram Amendments include:*
>
> *i. Amendments to the Metro Plan Diagram for the area between a city limit and the Plan Boundary;*
>
> *ii. A UGB or Metro Plan Boundary amendment east or west of I-5 that is not described as a Type III amendment.*
>
> *b. Type II Text Amendments include:*
>
> *i. Amendments that are non site specific and apply only to Lane County and one of the cities;* [7]
>
> *ii. Amendments that have a site specific application between a city limit of the home city and the Plan Boundary;"*

The subject 2030 Plan amendments to the Metro Plan include Type II diagram amendments (UGB and Metro Plan Boundary, plan designations) applicable to lands east of I-5 and text amendments applicable only to lands east of I-5.

As documented in the local record, and consistent with Sections 5.2-115 Notice, 5.14-135 and 5.14-140 of the Springfield Development Code and Lane Code Sections 12.205 through 12.225, the City initiated the amendment jointly with Lane County and notified all three governing bodies of the amendment, as required in Metro Plan IV-4, 8a. The Springfield and Lane County Planning Commissions conducted a

[7] This includes an amendment to *Metro Plan* to specify that a particular provision does not apply within the UGB on one side of I-5, or within the Metro Plan boundary on one side of I-5, as may be the case as Eugene and Springfield consider a regional planning program that includes the adoption of city-specific comprehensive plans to address some of the land use issues that have historically been addressed in the *Metro Plan*.

joint public hearing and forwarded recommendations to their respective elected bodies as required in Metro Plan IV-4,7b. As provided in Metro Plan IV-4,10:

> "…*Until a city has adopted a city-specific comprehensive plan that explicitly supplants the relevant portion of the Metro Plan, that city's refinement and functional plans must be consistent with the Metro Plan. After a city has adopted a city-specific comprehensive plan that explicitly supplants the relevant portion of the Metro Plan, that city's refinement and functional plans must be consistent with its city-specific comprehensive plan (instead of the Metro Plan). In any case, should inconsistencies occur between the applicable comprehensive plan and a refinement or functional plan, the applicable comprehensive plan is the prevailing policy document."*

The Springfield 2030 Economic and Urbanization Elements, UGB and Metro Plan boundary amendments explicitly supplant the relevant and UGB portions of the Metro Plan as described in the subject Ordinance and in this report.

III. Applicable Statewide Planning Goals

OAR 660-015-0000

Statewide Planning Goals 1, 2, 5, 6, 7, 8, 9, 11, 12, 13, 14 and 15 are applicable to this request. Because the proposal amends the comprehensive plan to meet economic development objectives, draft findings demonstrating compliance with the Goal 9 (Economy) and Goal 14 (Urban growth boundaries) administrative rules are provided first, followed by findings for remaining applicable statewide planning goals and rules.

- **Goal 9 (Economy of the State)** applies to adoption of local economic studies such as the Springfield CIBL/EOA. The Land Conservation and Development Commission (LCDC) adopted the Economic Development administrative rule (OAR Chapter 660, Division 009) to interpret Goal 9 and ORS 197.712.

- **Goal 14 (Urbanization)** governs amendment to urban growth boundaries; the Urban Growth Boundaries administrative rule (OAR Chapter 660, Division 024) provides detailed guidance for making UGB amendments.

- **Goal 1 (Citizen Involvement) and Goal 2 (Land Use Planning)** are procedural goals that require citizen involvement in all phases of the planning process; an adequate factual base for considering alternatives courses of action; coordination among the city, county and state agencies; adoption of ultimate policy choices in the Comprehensive Plan; and consistency between the Comprehensive Plan and implementing land use regulations.

- **Goals 5 (Natural Resources), 7 (Natural Hazards), 8 (Parks and Recreation) and 15 (Willamette River Greenway)** require local governments to address wetland and riparian resource areas, regulate development within the flood plain, plan to meet park and recreational needs, and protect

the Willamette River Greenway. Wetland and riparian corridors identified in the National Local Wetland Inventory (LWI), Metro Natural Resources Study (Springfield Ordinance 6150, Lane County Ordinance PA1215) are accounted for in the suitable employment lands inventory. As noted in the Goal 5 section of this report, additional waterways and wetlands have been identified through this planning process and have been considered.

- **Goal 6 (Air, Water, and Land Resource Quality), Goal 11 (Public Facilities and Services), Goal 12 (Transportation) and Goal 13 (Energy Conservation) also apply.**
- **Goal 11 (Public Facilities and Services), Goal 12 (Transportation)** and **Goal 13 (Energy Conservation)** also apply. Goal 12 is implemented by the Transportation Planning Rule (OAR Chapter 660, Division 012).

Springfield's current UGB — acknowledged in 2011 — provides land to accommodate the housing needs of the projected 2010-2030 population. The proposal does not affect the residential buildable lands inventory acknowledged in 2011. No re-designation of residential land is proposed in this action. All designated residential land in the current UGB is needed to accommodate the housing needs of projected 2010-2030 population. Springfield's current proposal does not require the application of a statewide planning goal relating to buildable lands for residential use. Therefore, Goal 10 is not applicable to this proposal.

IV. Statewide Planning Goal 9: Economy of the State

OAR 660-015-0000(9)
To provide adequate opportunities throughout the state for a variety of economic activities vital to the health, welfare, and prosperity of Oregon's citizens.

The City's 2030 Plan Amendments adopt the *City of Springfield 2030 Comprehensive Plan Economic Element* (2030 Economic Element) and its Technical Supplement — the *Springfield Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis Final Report* dated August 2015 (CIBL/EOA)— as Springfield's comprehensive plan in compliance with Statewide Planning Goal 9, Economic Development.

As required under Goal 9:

> *Comprehensive plans and policies shall contribute to a stable and healthy economy in <u>all regions</u> of the state.* [OAR 660-015-0000(9)] (emphasis added)

OAR 660-009-0000 Intent and Purpose

Goal 9, as implemented through the Division 9 Administrative Rules, has the following intent and purpose:

> *The intent of the Land Conservation and Development Commission is to provide an adequate land supply for economic development and employment growth in Oregon. The intent of this division is to link planning for an adequate land supply to infrastructure planning, community involvement and coordination among local governments and the state. The purpose of this division is to implement Goal 9, Economy of the State (OAR 660-015-0000(9), and ORS 197.712(2)(a) to (d). This division responds to legislative direction to assure that comprehensive plans and land use regulations are updated to provide adequate opportunities for a variety of economic activities throughout the state (ORS 197.712(1)) and to assure that comprehensive plans are based on information about state and national economic trends (ORS 197.717(2)).* [OAR 660-009—0000] (emphasis added)

The Springfield 2030 Comprehensive Plan Economic Element (2030 Economic Element) contains Springfield-specific goals, policies, and implementation measures to address Springfield's land needs for economic development and employment growth for the 2010-2030 planning period. The 2030 Economic Element provides policy direction for updating and amending refinement plans, zoning, and development regulations to address the community's commercial, industrial and other employment development needs.

The City's 2030 Plan updates Springfield's comprehensive plan and land use regulations to provide adequate opportunities for a variety of economic activities, based on information about state and national economic trends.[8] The 2030 Plan provides an adequate land supply in coordination with Metro regional and local infrastructure and transportation planning.

Adoption and acknowledgement of the City's 2030 Plan will support a stable and healthy economy in the Eugene-Springfield metro area region of the state[9] by ensuring that Springfield's land supply is planned efficiently to provide sites for employment growth, based on an inventory of the land supply and an Economic Opportunities Analysis consistent with the requirements of Goal 9 and the Goal 9 administrative rule OAR 660-009.

The 2030 Plan Economic Element will, upon its acknowledgement, establish the comprehensive plan policies and land use regulations applicable to lands within Springfield's Urban Growth Boundary that are designated for commercial and industrial uses, replacing the existing, more general *Metro Plan* Chapter III, Section B Economic Element policies. The *Metro Plan* Chapter III, Section B Economic Element policies were prepared and acknowledged to address economic development at the Eugene-Springfield Metro area regional level, based on a regional factual basis, and prior to the Commission's

[8] ECONorthwest CIBL/EOA Final Report, August 2015, Appendix A, pages 99-138 summarizes national, state, county and local trends affecting Springfield. The appendix covers recent and current economic conditions and forecast from the State Employment Department for employment growth in Lane County.
[9] About 40% of workers residing in Springfield commute to Eugene for work. While 1/3 of Springfield's workforce lives in Springfield, Springfield is able to attract workers from Eugene and surrounding Lane County.

adoption of the Goal 9 Economic Opportunities Analysis requirements.[10] The *Metro Plan* lists a single economic development goal:

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

Springfield's Economic Element planning goals, policies and implementation strategies affirm and implement this Metro Plan goal with an appropriate emphasis on maintaining and enhancing Springfield's role, responsibility, and identity within the regional and state economies of which it is a part. The Economic Element also integrates the goals and strategies of the Regional Prosperity Economic Development Plan — approved by the Springfield, Eugene and Lane County Joint Elected Officials (JEO) in February 2010 — to acknowledge Springfield's commitment to coordinating its land use policies with regional partners to advance creation of economic opportunities that are closely aligned with our region's assets and values.

The 2030 Plan Economic Element lists seven Economic Development Planning Goals:

1. ***"Broaden, improve and diversify the state and regional economy, and the Springfield economy in particular, while maintaining or enhancing environmental quality and Springfield's natural heritage.***

2. ***Support attainment of the Regional Prosperity Economic Development Plan goals for creating new metropolitan area jobs in the chosen economic opportunity areas, increasing the average annual wage and reducing unemployment.***

3. ***Strengthen and maintain strong, connected employment centers and economic corridors to support small, medium and large businesses.***

4. ***Establish, strengthen and maintain viable commercial centers to improve the community's access to goods and services.***

5. ***Support the development of emerging economies guided by the following principles:***
    a. ***Healthy Living—Champion businesses and entrepreneurs that promote a healthy, safe, and clean community while enhancing, protecting, and making wise use of natural resources.***
    b. ***Ideas to Enterprise—Encourage a culture of entrepreneurship and re-investment into the local community.***
    c. ***Regional Identity—Create a strong economic personality that celebrates our region's attributes and values.***

[10] LCDC adopted amendments to the Goal 9 administrative rule in December 2005.

d. ***Be Prepared—Contribute to development of the region's physical, social, educational, and workforce infrastructure to meet the needs of tomorrow.***
e. ***Local Resilience— Support businesses and entrepreneurs that lead the city and region to greater economic independence, innovation, and growth of the traded sector economies.***

6. ***Encourage and facilitate community and stakeholder collaboration.***

7. ***Make development decisions predictable, fair and cost-effective"***

Oregon Revised States addresses Economic Development in ORS 197.707 – 730.

ORS 197.712 (1) states:

> *"in carrying out statewide comprehensive land use planning, the provision of adequate opportunities for a variety of economic activities throughout the state is vital to the health, welfare and prosperity of all the people of the state."*

ORS 197.712 (2) states:

> *"By the adoption of new goals or rules, or the application, interpretation or amendment of existing goals or rules, the Land Conservation and Development Commission shall implement all of the following:*
>
> *(a) Comprehensive plans shall include an analysis of the community's economic patterns, potentialities, strengths and deficiencies as they relate to state and national trends.*
>
> *(b) Comprehensive plans shall contain policies concerning the economic development opportunities in the community.*
>
> *(c) Comprehensive plans and land use regulations shall provide for at least an adequate supply of sites of suitable sizes, types, locations and service levels for industrial and commercial uses consistent with plan policies.*
>
> *(d) Comprehensive plans and land use regulations shall provide for compatible uses on or near sites zoned for specific industrial and commercial uses."*

ORS 197.717(2) states:

> *"(1) State agencies shall provide technical assistance to local governments in:*

(a) Planning and zoning land adequate in amount, size, topography, transportation access and surrounding land use and public facilities for the special needs of various industrial and commercial uses;

(b) Developing public facility plans; and

(c) Streamlining local permit procedures.

(2) The Oregon Business Development Department shall provide a local government with "state and national trend" information to assist in compliance with ORS 197.712 (2)(a)."

To amend Springfield's comprehensive plans and land use regulations to provide for *at least an adequate supply of sites of suitable sizes, types, locations and service levels for industrial and commercial uses consistent with plan policies*, City staff and consultant ECONorthwest requested technical assistance from state agencies including the Oregon Business Development Department (Business Oregon) to obtain "state and national trend" information to assist in compliance with ORS 197.712 (2)(a)."

The 2030 Plan proposal utilizes state and national trend information provided to the City of Springfield by the Oregon Business Development Department (Business Oregon).[11]

As required by and consistent with the Division 9 administrative rule implementing Goal 9, ORS 197.712 (2)(a)-(d) and ORS 197.717(2), the proposal updates Springfield's comprehensive plan and land use regulations to assure that 1) the City's comprehensive plan includes an analysis of the community's economic patterns, potentialities, strengths and deficiencies as they relate to state and national trends[12]; 2) the City's comprehensive plan contains policies concerning the economic development opportunities in the community;[13] 3) the City's comprehensive plan and land use regulations shall provide for at least an adequate supply of sites of suitable sizes, types, locations and service levels for industrial and commercial uses consistent with plan policies;[14] and 4) the City's comprehensive plan and land use regulations[15] provide for compatible uses on or near sites zoned for specific industrial and commercial uses.

The 2030 Plan proposal adopts the Springfield Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis Final Report, dated August 2015 (CIBL/EOA) into the comprehensive plan as the Technical Supplement of the Springfield 2030 Comprehensive Plan Economic Element.

OAR 660-015-0000(9)

[11] ECONorthwest, Springfield CIBL/EOA Final Report, August 2015, 107-108,170-174.
[12] ECONorthwest, Springfield CIBL/EOA Final Report, August 2015.
[13] Springfield 2030 Comprehensive Plan Economic Element
[14] Metro Plan Diagram, Springfield UGB, and Springfield Development Codes as amended through Springfield Ordinance 6361 and Lane County Ordinance PA1304
[15] Springfield Development Codes as amended through Springfield Ordinance 6361; and Lane Code as amended through Ordinance 16-05

"Comprehensive plans and policies shall contribute to a stable and healthy economy in all regions of the state.

Such plans shall be based on inventories of areas suitable for increased economic growth and activity after taking into consideration the health of the current economic base; materials and energy availability and cost; labor market factors; educational and technical training programs; availability of key public facilities; necessary support facilities; current market forces; location relative to markets; availability of renewable and non-renewable resources; availability of land; and pollution control requirements."

The CIBL/EOA inventory and analysis document was prepared by the City's primary consultant ECONorthwest as the factual base for the 2030 Plan Economic Element and Urbanization Element. As explained in CIBL/EOA Chapter 1, pp. 1-6, the CIBL/EOA was prepared to address the requirements of Goal 9 and Division 9. The CIBL/EOA includes an inventory of land[16], an Economic Opportunities Analysis (EOA) and an economic development strategy (Appendix D). As supported by evidence in the record, the City involved the community in its process to plan for an adequate land supply for economic development as it developed the CIBL/EOA, the economic development strategy and the 2030 Economic Element goals, policies, implementation measures. As supported by evidence in the record and in this report, the 2030 Plan is based on an inventory of areas suitable for increased economic growth and activity after taking into consideration the need to improve the health of the current economic base;[17] after consideration of materials and energy availability and cost; [18] after consideration of labor market factors, educational and technical training programs;[19] after consideration of the availability of key public facilities and necessary support facilities;[20] after consideration of current market forces;[21] after consideration of location relative to markets;[22] after consideration of availability of renewable and non-renewable resources;[23] after considering availability of land; [24] and after considering pollution control requirements.[25]

The health of the current Springfield economic base needs improvement to increase wages. As described in CIBL/EOA page 113, income in Lane County and Springfield has historically been lower than the State or national averages. Lane County's median household income in 2006 was $42,127 compared with $46,230 for Oregon and the national average of $48,451. The median household income in Springfield in 1999 was $33,031 or 89% of the County average of $36,942. The average pay per employee in Lane County in 2006 was $33,240. Additional data compiled by the 2013 Lane Livability

[16] CIBL/EOA, pp. 17-39
[17] CIBL/EOA Final report, Chapter 3, pp. 43-54; Appendix A, pp. 110-117; Appendix B & C pp. 139-170
[18] CIBL/EOA Final report, Chapter 3, pp. 54-58.
[19] CIBL/EOA Final report, Appendix B pp. 146-152.
[20] Ibid, pp. 142-146, and City's Public Facilities Analyses under Goal 14
[21] Ibid, Chapter 3, 4, Appendices A, B and C
[22] Ibid, pp. 54-69
[23] Ibid, pp. 101-109
[24] Ibid, Chapter 2, pp. 5-41
[25] See City's findings under Goal 14 Location Factors, page 388 and Public Facilities Analyses, pp. 211.

Consortium's *Equity and Opportunity Assessment* (work task of the Central Lane MPO HUD Sustainable Communities grant) to explain the need to increase wages in Springfield is provided in the record. [26]

The economic sectors with above average pay and high employment were: Construction, Manufacturing, Government, and Health and Social Services. The sectors with below average pay and high employment were: Retail, Accommodations and Food Services, and Administration and Support and Waste Management.

The types of industries that Springfield wants to attract to meet its economic development objectives are: high-wage, stable jobs with benefits; jobs requiring skilled and unskilled labor; employers in a range of industries that will contribute to a diverse economy; and industries that are compatible with Springfield's community values.

ORS 197 includes provisions recognizing the fact that industrial development that provides above-average wages and employs a skilled workforce is of significance to the economic recovery of the State of Oregon.[27]

It is the City's responsibility under Oregon law to designate land and adopt policies that will support creation of more and better economic opportunities for Springfield's citizens. The 2030 Plan considers the health of the current economic base by focusing on target industries that are well matched with the region's work force and existing employment clusters *and* industries that have higher than average wages.

The 2030 Plan maintains existing employment and commerce areas that are affordable places to start up and run locally operated small businesses (Main Street Corridor, Downtown, Mohawk), as shown in CIBL/EOA Map 2-1 areas designated for employment and commerce.

The 2030 Plan supports intensification of development and redevelopment in key areas of the City that are currently served with infrastructure (Downtown, Gateway, Mohawk, Main Street Corridor, or are immediately adjacent to existing infrastructure, transportation systems and urban services (Glenwood, North Gateway and Mill Race UGB expansion areas).

The 2030 Plan recognizes the importance of larger sites in the City's land inventory to meet the needs of target industries that have higher average wages.

The 2030 Plan considers the health of the current economic base by expanding the UGB to provide several large sites immediately adjacent to one of the City's most successful existing economic districts: Gateway/International Way.

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[26] Livability Lane Maps, Equity & Opportunity Assessment, Part A Income & Poverty; Part B and C Socio demographic Conditions for Poverty in Latino and Minority Households; Part D Renter Households with Cost Burden; Part E Affordable Housing Access; Part F Free and Reduced Lunch Recipients; and Part G Jobs Accessible by Transit in 30 minutes, 2013.

[27] **Note:** Sections 1, 2, 3, 4, 5, 12 and 13, chapter 564, Oregon Laws 2011

The 2030 Plan considers the health of the current economic base by expanding the UGB to provide several large sites located in Mid-Springfield (Mill Race) that are immediately adjacent to an existing industrial district and nearby natural and recreational amenities.

The CIBL/EOA and 2030 Plan identify target industries that are matched with local resources, water, and electricity. The City's CIBL/EOA and Economic Element policies, and UGB amendment provide local employment opportunities in proximity to Springfield residents, and thus reduce vehicle miles travelled from home to work. Implementation of the City's 2030 Employment Growth Concept will increase the number and diversity of jobs within existing and planned centers, districts and corridors that are accessible to and from the regions' Frequent Transit Network, and in employment centers with proximate access to the I-5 freeway, OR 126 and rail freight corridors, thus reducing energy consumption associated with transportation. By providing more local retail and office commercial opportunities in Springfield, Springfield residents will be less likely to drive outside the area to meet these needs. By providing more employment opportunities in Springfield, residents will be closer to work and more likely to take transit, bicycle or walk to work, thus reducing household transportation cost burden and reducing energy consumption.

Chapter 5 of the CIBL/EOA discusses how materials and energy availability (pp. 102-105) and cost and buying power of markets (CIBL/EOA p. 55, and Appendix B, Table B-1, page 141) are considered. Chapter 3 (pp. 44-51, 57, 142-151) provides discussion of labor market factors, and workforce education opportunities. Availability of key public facilities and necessary support facilities is described in CIBL/EOA pp. 55-56, 142-151 and 129 Business clusters. Appendix A (p. 99-138) and Appendix B (p. 139) addresses trends, shifts in the economy and current market forces. Chapter 3, p 54-58 describes Springfield's location relative to markets. Availability of renewable and non-renewable resources is discussed p. 101-109, and 145 (water).

Availability of land is described in detail in the inventory (pp. 8-43); in the land demand analysis (pp. 59-98); and in the City's assumptions about redevelopment capacity of developed land (pp. 27-39, and 77-81) to accommodate growth through redevelopment.

The 2030 Plan is based on inventories of areas suitable for increased economic growth and activity after taking into consideration pollution control requirements. The *Metro Plan* Environmental Element addresses pollution control. Springfield provides Environmental Services programs to meet our federal and state water quality permit requirements and MWMC wastewater treatment standards. The Springfield Development Code provides protective measures for Water Quality Limited Waterways and requires pretreatment of all stormwater from development. The City is moving away from heavy industry in environmentally sensitive areas and has policies and EPA grant-funded programs in place to assist with brownfield assessment. The City Development Code has a Drinking Water Protection Overlay District to protect groundwater source areas, and Campus Industrial special standards to address pollution controls.

The 2030 Plan is based on inventories of areas suitable for increased economic growth and activity after taking into consideration the health of the current economic base; materials and energy availability and

cost; labor market factors; educational and technical training programs; availability of key public facilities; necessary support facilities; current market forces; location relative to markets; availability of renewable and non-renewable resources; availability of land; and pollution control requirements.

The referenced documents provide evidence that each factor of OAR 660-015-0000(9) was carefully considered in the City's analysis of employment land needs, its economic development vision, its policy choices, and its selection of practical and realistic implementation economic development strategies.

As stated in the CIBL/EOA p. ii-iv, the economic development strategy for Springfield can be summarized as follows:

(1) Facilitate the redevelopment of Downtown Springfield and Glenwood through strategic infrastructure and other investments from programs such as urban renewal and planning for redevelopment.

(2) Provide sites with a variety of site characteristics to meet both commercial and industrial economic opportunities, including providing sites that are available for relatively fast development. This includes providing large sites for major employers.

(3) Use land within the existing urban growth boundary efficiently, through promoting redevelopment, infill development, and dense development in nodal areas. The study assumes that 46% of new employment would not require vacant land.

(4) Provide infrastructure efficiently and fairly by coordinating capital improvement planning with economic development planning.

(5) Support and assist existing businesses within Springfield by assessing what help businesses need and developing programs to respond to business needs.

(6) Attract and develop new businesses, especially those related to regional business clusters. The City would like to build on the developing health care cluster, promote development of high-tech businesses, and attract sustainable businesses.

(7) Maintain flexibility in planning through providing efficient planning services and developing flexible planning policies to respond to the changing needs of businesses.

CIBL/EOA Chapter 3 provides more detail on Springfield's comparative advantages and target industries; the Springfield Economic Development Strategy (included in Appendix D) articulates the City's economic development vision.

The 2030 Economic Element goals, policies and implementation strategies identify suitable areas for increased economic growth and activity in response to specific opportunities and challenges identified in the Springfield Commercial and Industrial Land Inventory and Economic Opportunities Analysis (CIBL/EOA). The goals, policies and implementation strategies of the 2030 Economic Element work with existing land use regulations, new land use regulations, and an amendment of the UGB to ensure that

an adequate supply of land is planned, designated and zoned to support employment and commerce for the 2010-2030 planning period.

The adopted 2030 Economic Element and Springfield Development Code regulations are consistent with the intent and purpose of Goal 9 [OAR 660-009-0000]

Goal 9 also states: *Comprehensive plans for urban areas shall:*

> *"1. Include an analysis of the community's economic patterns, potentialities, strengths, and deficiencies as they relate to state and national trends;*
>
> *2. Contain policies concerning the economic development opportunities in the community;*
>
> *3. Provide for at least an adequate supply of sites of suitable sizes, types, locations, and service levels for a variety of industrial and commercial uses consistent with plan policies;*
>
> *4. Limit uses on or near sites zoned for specific industrial and commercial uses to those which are compatible with proposed uses."*

<u>Springfield Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis (CIBL/EOA).</u> The inventory and analysis fact base for the Springfield 2030 Comprehensive Plan is contained in the Springfield Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis (CIBL/EOA) adopted as a Technical Supplement to the 2030 Comprehensive Plan Economic Element. As explained in CIBL/EOA pp. 2-ECONorthwest prepared the Springfield EOA in compliance with the Goal 9 administrative rule (OAR Chapter 660, Division 009 – Economic Development). Suitable areas for increased economic growth and activity within the existing UGB and proposed amendment to the UGB were determined through a public planning process conducted 2008-2015 (fully documented in the record).

The Final CIBL/EOA Report (Chapter 2) includes an inventory of land suitable for increased economic growth and activity. After a thorough and complete analysis, the adopted 2015 Springfield CIBL/EOA identifies the number, acreage and characteristics of sites that will be needed during the 20-year planning period to attract targeted employment opportunities and to meet their operational requirements.

The 2030 Plan proposal adopts a comprehensive plan policy element that contains policies that identify economic development opportunities in the community — the Springfield 2030 Comprehensive Plan Economic Element.

The City's Springfield 2030 Comprehensive Plan amendments to the Eugene/Springfield Metro Plan address Statewide Planning Goal 9 through a two-prong economic development strategy: 1) increasing and diversifying Springfield's inventory of suitable sites for development within the current UGB by supporting and incentivizing economic activity and redevelopment in key growth centers and

corridors with public planning and infrastructure investments; and 2) increasing and diversifying Springfield's inventory of suitable sites for new larger scale economic development and employment uses through an expansion of the UGB.

The proposal includes 1) adoption and implementation of new comprehensive plan Urbanization and Economic Element policies; and 2) an amendment of the UGB to add several suitable large employment opportunity sites. Together, these 2030 Plan public actions will support economic growth and activity in Springfield by:

- increasing the inventory of suitable land planned for a range of mixed-use, commercial, industrial and other employment uses to meet the evolving needs of a 21st economy; and
- creating improved conditions and opportunities for the commercial, industrial and mixed-use development markets to act over the 20-year planning period.

Thus, approval of this proposal and subsequent implementation of Springfield 2030 Comprehensive Plan policies will contribute to a more stable and healthy economy in the Eugene-Springfield and Southern Willamette Valley regions and contribute to Oregon's economy and livability.

OAR 660-009-0000 Conclusion. The City's 2030 Plan amendments establish a land base to support economic development opportunities in the community in compliance with Goal 9, Economy of the State.

The following findings demonstrate compliance with the Goal 9 administrative rules.

OAR 660-009-0005 Definitions states:

> *"For purposes of this division, the definitions in ORS chapter 197 and the statewide planning goals apply, unless the context requires otherwise. In addition, the following definitions apply:*
>
> *(1) "Developed Land" means non-vacant land that is likely to be redeveloped during the planning period.*
>
> *(2) "Development Constraints" means factors that temporarily or permanently limit or prevent the use of land for economic development. Development constraints include, but are not limited to, wetlands, environmentally sensitive areas such as habitat, environmental contamination, slope, topography, cultural and archeological resources, infrastructure deficiencies, parcel fragmentation, or natural hazard areas.*
>
> *(3) "Industrial Use" means employment activities generating income from the production, handling or distribution of goods. Industrial uses include, but are not limited to: manufacturing; assembly; fabrication; processing; storage; logistics; warehousing; importation; distribution and transshipment; and research and development. Industrial uses may have unique land, infrastructure, energy, and transportation requirements. Industrial uses may have external impacts on surrounding uses and may cluster in*

traditional or new industrial areas where they are segregated from other non-industrial activities.

(4) "Locational Factors" means market factors that affect where a particular type of industrial or other employment use will locate. Locational factors include, but are not limited to, proximity to raw materials, supplies, labor, services, markets, or educational institutions; access to transportation and freight facilities such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes; and workforce factors (e.g., skill level, education, age distribution).

(5) "Metropolitan Planning Organization (MPO)" means an organization designated by the Governor to coordinate transportation planning on urban land of the state including such designations made subsequent to the adoption of this division. The Longview-Kelso-Rainier MPO is not considered an MPO for the purposes of this division. Cities with less than 2,500 population are not considered part of an MPO for purposes of this division.

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

(7) "Planning Area" means the area within an existing or proposed urban growth boundary. Cities and counties with urban growth management agreements must address the urban land governed by their respective plans as specified in the urban growth management agreement for the affected area.

(8) "Prime Industrial Land" means land suited for traded-sector industries as well as other industrial uses providing support to traded-sector industries. Prime industrial lands possess site characteristics that are difficult or impossible to replicate in the planning area or region. Prime industrial lands have necessary access to transportation and freight infrastructure, including, but not limited to, rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes. Traded-sector has the meaning provided in ORS 285B.280.

(9) "Serviceable" means the city or county has determined that public facilities and transportation facilities, as defined by OAR chapter 660, division 011 and division 012, currently have adequate capacity for development planned in the service area where the site is located or can be upgraded to have adequate capacity within the 20-year planning period.

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

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

(12) "Suitable" means serviceable land designated for industrial or other employment use that provides, or can be expected to provide the appropriate site characteristics for the proposed use.

(13) "Total Land Supply" means the supply of land estimated to be adequate to accommodate industrial and other employment uses for a 20-year planning period. Total land supply includes the short-term supply of land as well as the remaining supply of lands considered suitable and serviceable for the industrial or other employment uses identified in a comprehensive plan. Total land supply includes both vacant and developed land.

(14) "Vacant Land" means a lot or parcel:

(a) Equal to or larger than one half-acre not currently containing permanent buildings or improvements; or

(b) Equal to or larger than five acres where less than one half-acre is occupied by permanent buildings or improvements."

City's definition of "vacant" assumes more development can occur on developed land.[28]

The City's CIBL/EOA p.9, Table 2-2 explains the relationship between the definitions in OAR 660-009-0005 and how land was classified in the City's inventory by the City's consultant ECONorthwest. It is important to note that the definition of vacant land used in Springfield's analysis is more inclusive than what statewide planning policy requires. The implication of using a more inclusive definition is that more land was considered available in the inventory than would be if the state definitions were used. Thus, the City's use of the more inclusive definition of "vacant" in the inventory assumes more development can occur on developed land. Use of this definition and application of this assumption to

[28] See Exhibit F-1 Supplemental Findings, pp. 38-42.

the land inventory was vetted through the City's public involvement process, contributes to land use efficiency, and reduces the overall commercial and industrial land need.

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

- *Vacant land.* Tax lots that have no structures or have buildings with very little value. For the purpose of this inventory, lands with improvement values under $10,000[29] are considered vacant (not including lands that are identified as having mobile homes).[30] Note that this definition is considerably more inclusive than what is required by OAR 660-009-0005(14). It includes all lots or parcels that are less than one half-acre and did not automatically classify lots between 0.5 and 5.0 acres as developed if they had pre-existing development. Lots in that category were visually inspected to make a determination of whether they should be classified as developed or vacant. (emphasis added)

- *Developed land.* Land that is developed at densities consistent with current zoning/plan designation and improvements that make it unlikely to redevelop during the analysis period. Lands not classified as vacant, potentially redevelopable, or public are considered developed.[31] Note that OAR 660-009-0005(1) uses the following definition: (1) "Developed Land" means non-vacant land that is likely to be redeveloped during the planning period. This study defines developed land as developed and defines land "likely to be redeveloped" as potentially redevelopable. Thus, the definition of developed land used for the CIBL is different (e.g., more inclusive) than the definition in the administrative rule. For purposes of the CIBL, developed land is considered committed during the 20-year period and unavailable for redevelopment. (emphasis added)

- *Potentially Redevelopable land.* Land on which development has already occurred but on which, due to present or expected market forces, there exists the potential that existing development will be converted to more intensive uses during the planning period.[32] While Springfield expects many buildings and sites of all types to be re-used, re-purposed, revitalized and renovated throughout the city over the planning period, for the purposes of

[29] Improvement values were from 2008 Lane County Assessment and Taxation data and reflect the County's estimate of the market value of improvements.
[30] Note that this definition is more inclusive than what statewide planning policy requires. OAR 600-009-0005(14) provides the following definition: "Vacant Land" means a lot or parcel: (a) Equal to or larger than one half-acre not currently containing permanent buildings or improvements; or (b) Equal to or larger than five acres where less than one half-acre is occupied by permanent buildings or improvements. The implication of using a more inclusive definition are that more land was considered available in the inventory than would be if the state definitions were used. See Exhibit F-1 Supplemental Findings, pp. 38-42.
[31] Note that OAR 660-009-0005(1) uses the following definition: (1) "Developed Land" means non-vacant land that is likely to be redeveloped during the planning period. This study defines developed land as developed and defines land "likely to be redeveloped" as potentially redevelopable.
[32] This definition is based on the definition in OAR 660-009-0005(1).

analyzing the capacity of the land base to absorb a portion of employment growth, only redevelopment that increases capacity for accommodating additional employment is a factor in this analysis. Potentially redevelopable land is a subset of developed land that was identified using improvement to land value ratios and building coverage ratios. For the purpose of the CIBL, "potentially redevelopable" land corresponds with the definition of "developed land" as stated in OAR 660-009-0005(1) as described in Table 2-2. The City's study included a detailed evaluation of developed land to determine its redevelopment potential. Lands that were determined to be potentially redevelopable were classified as such. (emphasis added)

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

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

Exhibit F-1 Supplemental Findings, pp. 38-42 provide additional discussion of CIBL land classifications.

The following findings address OAR 660-009-0015 (1) and related requirements in OAR 660-009-0015 (4).

Conclusion OAR 660-009-0005: The City's CIBL/EOA complies with the definitions set out in the Goal 9 Administrative Rules and uses a more inclusive definition of 'vacant land' that results in

including more land in the City's developable land inventory inside the UGB. The City's analysis classified 41.4 total acres in lots less than 0.5 acres, including 29.3 unconstrained acres. Under the rule definition, those sites would not have been considered vacant.

IVa. Economic Opportunities Analysis

OAR 660-009-0015 Economic Opportunities Analysis states:

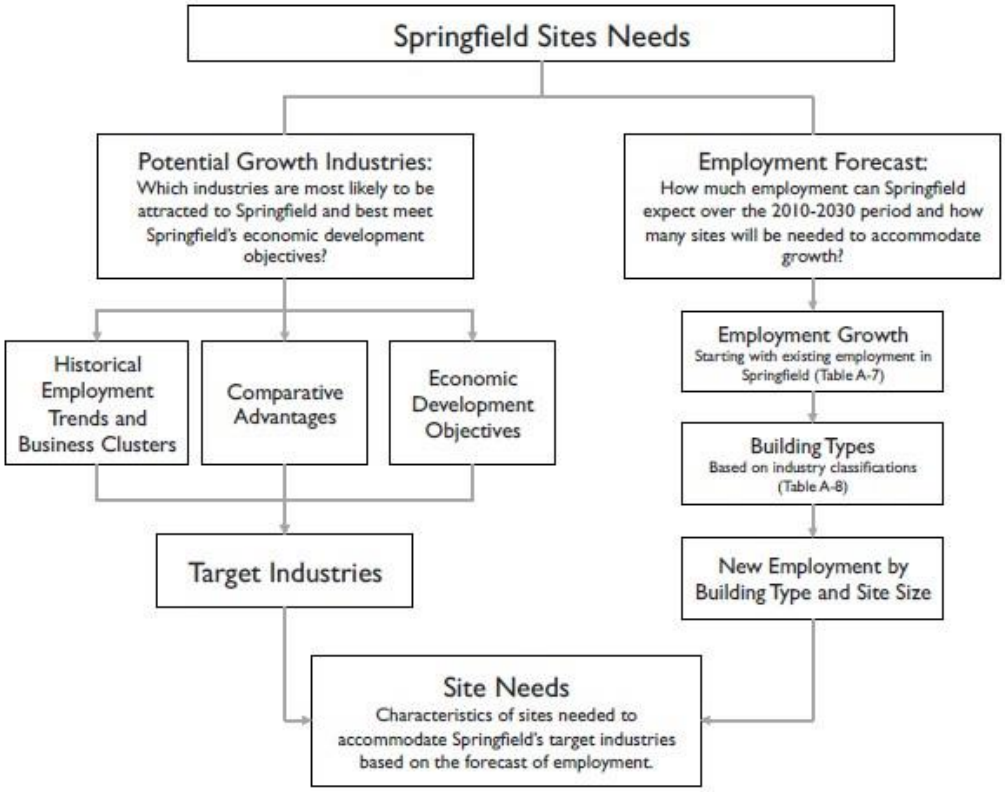
> *"Cities and counties must review and, as necessary, amend their comprehensive plans to provide economic opportunities analyses containing the information described in sections (1) to (4) of this rule. This analysis will compare the demand for land for industrial and other employment uses to the existing supply of such land."*

The City's amendment to the comprehensive plan to provide an Economic Opportunities Analysis must contain the four components listed in Sections 1-4 of OAR 660-009-0015:

- Review of National, State, Regional, County and Local Trends
- Identification of Required Site Types
- Inventory of Industrial and Other Employment Lands
- Assessment of Community Economic Development Potential

CIBL/EOA Figure 4-1, p. 60 identifies how the required components of the City's analysis are used to determine Springfield's site needs:

Figure 4-1. Process for identifying site needs in Springfield.



Source: ECONorthwest

The City's 2030 amendments to the comprehensive plan adopted the Springfield CIBL into the comprehensive plan to address the four required components of OAR 660-009-0015. The following findings provide an overview of and references to each required component.

OAR 660-009-0015 (1) Review of National, State, Regional, County and Local Trends states:

> *"The economic opportunities analysis must identify the major categories of industrial or other employment uses that could reasonably be expected to locate or expand in the planning area based on information about national, state, regional, county or local trends. This review of trends is the principal basis for estimating future industrial and other employment uses as described in section (4) of this rule. A use or category of use could reasonably be expected to expand or locate in the planning area if the area possesses the appropriate locational factors for the use or category of use. Cities and counties are strongly encouraged to analyze trends and establish employment projections in a geographic area larger than the planning area and to determine the percentage of employment growth reasonably expected to be captured for the planning*

area based on the assessment of community economic development potential pursuant to section (4) of this rule."

OAR 660-009-0015 (4) Assessment of Community Economic Development Potential states:

"The economic opportunities analysis must estimate the types and amounts of industrial and other employment uses likely to occur in the planning area. The estimate must be based on information generated in response to sections (1) to (3) of this rule and must consider the planning area's economic advantages and disadvantages. Relevant economic advantages and disadvantages to be considered may include but are not limited to:

(a) Location, size and buying power of markets;

(b) Availability of transportation facilities for access and freight mobility;

(c) Public facilities and public services;

(d) Labor market factors;

(e) Access to suppliers and utilities;

(f) Necessary support services;

(g) Limits on development due to federal and state environmental protection laws; and

(h) Educational and technical training programs."

To address OAR 660-009-0015(1) and (4), the Springfield Economic Opportunities Analysis (EOA) uses the review of national, state, regional, county and local trends and assessment of community economic development potential "to estimate the types and amounts of industrial and other employment uses likely to occur in the planning area" in Chapter 3, Chapter 4, Appendix A and Appendix B. The "planning area" is defined in OAR 660-009-0005(7) as "*the area within an existing or proposed urban growth boundary*." For this study, the planning area is land within the Springfield UGB and the proposed expansion of the Springfield UGB. *"Locational factors for the use or category of use"* are defined in OAR 660-009-0005(4): *"Locational Factors" means market factors that affect where a particular type of industrial or other employment use will locate. Locational factors include, but are not limited to, proximity to raw materials, supplies, labor, services, markets, or educational institutions; access to transportation and freight facilities such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes; and workforce factors (e.g., skill level, education, age distribution).*

The State forecasts that employment will continue growing in Lane County at 1.4% average annual growth, compared with the State average of 1.3% average annual growth. [33]

Chapter 3 and appendices A and B of the CIBL/EOA (pp. 43-58) provide data to describe economic trends and locational factors affecting future growth in Springfield. OAR 660-009-0015(1) states: *"A use or category of use could reasonably be expected to expand or locate in the planning area if the area possesses the appropriate locational factors for the use or category of use."* Chapter 3 describes availability of labor, changing population demographics, incomes, workforce, economic outlook, shifts in employment, outlook for growth, and regional business activity. The growing importance of the healthcare industry is noted, due to the location of two major healthcare centers (Sacred Heart RiverBend and McKenzie Willamette) in Springfield. The continued importance of manufacturing to provide desirable above-average wage jobs is noted, accounting for 10% of employment in Springfield.[34]

> *"Manufacturing is a traded sector industry, which brings revenue into Oregon and Lane County from outside the State. The following manufacturing industries accounted for two-thirds ($11 billion) of revenue from exports in Oregon in 2007: Computer & Electronic Production, Transportation Equipment, Machinery Manufacturers, Chemical Manufacture, and Primary Metal Manufacturers.[35] These industries are all present in Lane County, accounting for 44% of manufacturing employment in the County."[36]*

Tourism is important in Springfield's economy. A major source of tourism spending is overnight accommodations. Between 2000 and 2008, Springfield's lodging tax revenue varied from $1.2 million in fiscal year 2004 to $1.6 million in fiscal year 2007. Springfield's transient lodging tax revenues accounted for about one-quarter of total County lodging tax revenues. [37] Since the City's CIBL/EOA was prepared, several new hotels have been built in Glenwood and Gateway, and more are in the planning stages in early 2016.

<u>Locational Factors Influencing Springfield's Comparative Advantages.</u> Chapter 3 pp. 54-58 provides data describing Springfield's comparative advantages for economic development: location, availability of transportation facilities and other public facilities, quality and availability of labor, and quality of life relative to these conditions in other portions of the Lane County and southern Oregon. Springfield's primary comparative advantages are its location on Interstate Highway 5, proximity to Eugene, access to skilled labor, cost of labor, and high quality of life. These factors make Springfield attractive to residents and businesses that want a high quality of life where they live and work. As stated in the CIBL/EOA, factors that form Springfield's comparative advantage are summarized below and described in detail in Appendix B:

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[33] CIBL/EOA, p. 70-71
[34] In 2006
[35] "Economic Data Packet, Mary 2008," Oregon Economic And Community Development Department
[36] CIBL/EOA, p. 53
[37] Ibid

- ***"Location.*** *Springfield is located in the Southern Willamette Valley, next to Eugene, between the Willamette River (to the south) and McKenzie River (to the north). Interstate 5 runs to the west of Springfield and Highway 126 runs east-west through Springfield. Springfield's location, access to I-5 and Highway 126, and proximity to Eugene are primary comparative advantages for economic development in Springfield. These factors make Springfield attractive to businesses, especially those wanting to locate in the Willamette Valley.*

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

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

- ***Transportation.*** *Businesses and residents in Springfield have access to a variety of modes of transportation: automotive (Interstate 5, multiple State highways, and local roads); rail (Union Pacific and Amtrak); transit (LTD)[38]; and air (Eugene Airport). Springfield has excellent automotive access for commuting and freight movement. Springfield is located along Interstate 5, the primary north-south transportation corridor on the West Coast, linking Springfield to domestic markets in the United States and international markets via West Coast ports. Springfield has developed along Highway 126, Highway 126 is the primary east-west highway in Lane County, running from Florence to Redmond.*

  Other transportation options in Springfield include: multiple Union Pacific rail lines provide freight service; transit service from the Lane Transit District provides bus service,

[38] In 2016, the West Eugene EmX Bus Rapid Transit line is under construction. When complete, it will connect Springfield and Eugene residents to 56,000 jobs along the EmX line. https://www.ltd.org/latest-news/governor-brown-tours-eugene/

including Bus Rapid Transit, *within Springfield and connects Springfield with Eugene; and the Eugene Airport provides both passenger and freight service. Springfield's access to multiple modes of transportation provides Springfield with advantages in attracting businesses that need easy access to I-5 for automotive or some types of freight movement. Springfield may have disadvantages in attracting businesses that need large lots and easy access to I-5 because of the lack of buildable land along I-5 near Highway interchanges.*

- ***Public Facilities and Services.*** The City has sufficient wastewater and water services to meet expected residential and employment needs. *SUB has lower water rates than the national average. The combination of available and lower cost water may be an advantage to attracting some types of businesses to Springfield.*

- ***Public Policy.*** *The City can impact economic growth through its policies about the provision of land, redevelopment, and infill development. Success at attracting or retaining firms may depend on availability of attractive sites for development, especially large sites. For example, Springfield was attractive as a location of PeaceHealth's new hospital because the City had a large, relatively flat site located relatively near to Interstate 5 and Beltline Highway. Springfield's decision makers articulated their support for provision of employment land through the economic development strategy and in other policy choices. Objectives in the economic development strategy supporting the provision of employment land include objectives to: (1) provide employment land in a variety of locations, configurations, and site sizes for industrial and other employment uses, (2) provide an adequate competitive short-term supply of suitable land to respond to economic development opportunities as they arise, (3) reserve sites over 20-acres for special developments and industries that require large sites, and (4) provide adequate infrastructure to sites. The economic development strategy also includes objectives that support redevelopment of existing land within the UGB, especially in Downtown and in Glenwood, and infill development. The City is promoting redevelopment in Glenwood and Downtown through its administration of two Urban Renewal Districts.*

- ***Labor Market.*** *Commuting is common in Springfield. About 40% of the people who live in Springfield commute to Eugene for work. Less than one-third of Springfield's workers live in Springfield. The implication of this workforce analysis is that, while only one-third of Springfield's workforce lives within the City, Springfield is able to attract educated workers from most of Eugene and surrounding areas. Most people living or working in Springfield commute within the Eugene-Springfield area. This commuting pattern gives Springfield firms access to the workforce within the Eugene-Springfield region.*

  Springfield residents generally have a shorter commute than residents of Lane County or Oregon. Eighty percent of Springfield residents commute 29 minutes or less, compared

to 77% of Lane County residents and 69% of Oregonians. 7% of Springfield's residents are commuting 45 minutes or more, compared to 10% of Oregonians.[39] *The region's existing and planned public transit system provides access to employment within the Eugene-Springfield Metro area. Springfield's potential employment commute shed is extensive.*[40]

Opportunities for workforce training and post-secondary education for residents of the Eugene-Springfield area include: the University of Oregon, Lane Community College, Northwest Christian College, and Gutenberg College."

Appendix C of the CIBL/EOA (pp. 159-162) explains why and how Springfield's comparative advantages are factors that may influence the locational decisions of firms.

"*Key determinants of a location decision are a firm's factors of production….In general, firms choose locations they believe will allow them to maximize net revenues: if demand for goods and services is held roughly constant, then revenue maximization is approximated by cost minimization."*

Production Factors. Table C-4, pp. 163-165 presents a summary of typical *production factors* and how these factors align with Springfield's labor, land infrastructure, access to markets, materials, entrepreneurship, regulation, taxes, financial incentives, industry clusters, quality of life and innovative capacity. For example:

- *"Labor. Based on existing commuting patterns, Springfield has access to labor from the Eugene-Springfield Region.*
- *Land. Demand for land depends on the type of firm. Manufacturing firms need more space and tend to prefer suburban locations where land is relatively less expensive and less difficult to develop. Warehousing and distribution firms need to locate close to interstate highways.*
- *Access to markets. Firms need to move their product, either goods or services, to the market, and they rely on access to different modes of transportation to do this. Springfield's access to I-5 and Highway 126 provide the City with advantages in attracting businesses that need easy access to highways.*
- *Materials. Firms producing goods, and even firms producing services, need various materials to develop products that they can sell. Some firms need natural resources. For example, lumber manufacturing requires trees. Or, farther down the line, firms may need intermediate materials: for example, dimensioned lumber to build manufactured housing.*

[39] CIBL/EOA p. 48-49

[40] Map: Industrial Competitiveness Criteria (prepared by LCOG staff for the City of Springfield) is a graphic depiction of a workforce of 250,000 living within a 40-mile radius of the I-105 interchange in Springfield — extending north to Corvallis, south to include Creswell and Cottage Grove, and southeast to include the communities of Lowell and Oakridge.

- *Studies of economic development have shown that location decisions depend on a variety of other factors that indirectly affect costs of production. These indirect factors include agglomerative economies (also known industry clusters), quality of life, and innovative capacity.*
    - *Industry clusters. Firms with similar business activities can realize operational savings when they congregate in a single location or region. Clustering can reduce costs by creating economies of scale for suppliers. For this reason, firms tend to locate in areas where there is already a presence of other firms engaged in similar or related activities.*
    - *Quality of life. A community that features many quality amenities, such as access to recreational opportunities, culture, low crime, good schools, affordable housing, and a clean environment can attract people simply because it is a nice place to be. A region's quality of life can attract skilled workers, and if the amenities lure enough potential workers to the region, the excess labor supply pushes their wages down so that firms in the region can find skilled labor for a relatively low cost. The characteristics of local communities can affect the distribution of economic development within a region, with different communities appealing to different types of workers and business owners. Sometimes location decisions by business owners are based on an emotional or historical attachment to a place or set of amenities, without much regard for the cost of other factors of production.*

    - *Innovative capacity. Increasing evidence suggests that a culture promoting innovation, creativity, flexibility, and adaptability is essential to keeping U.S. cities economically vital and internationally competitive. Innovation is particularly important in industries that require an educated workforce. High-tech companies need to have access to new ideas typically associated with a university or research institute. Innovation affects both the overall level and type of economic development in a region. Government can be a key part of a community's innovative culture, through the provision of services and regulation of development and business activities that are responsive to the changing needs of business."*[41]

The City's CIBL/EOA presents an assessment of Springfield's economic development potential based on the information generated in response to the Review of National, State, Regional, County and Local Trends; Identification of Required Site Types; and an Inventory of Industrial and Other Employment Lands. [OAR 660-009-0015(4)]

Chapter 4 of the CIBL/EOA (pp. 61- 72) identifies potential growth industries and key trends affecting employment growth in Springfield:

[41] CIBL/EOA. P 159-165.

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

Springfield may have opportunities for growth in other sectors that the State forecasts will have high growth, such as: Arts, Entertainment, and Recreation; Management of Companies and Enterprises; Professional, Scientific, and Technical Services; and Private Educational Services.

Historical trends described in Springfield's EOA include a shift away from manufacturing, a transition away from reliance on traditional resource-extraction industries, and growth of employment in high-technology manufacturing industries (Industrial Machinery, Electronic Equipment, and Instruments.)[42]

"Key historical trends between 1980 to 2007 period include:

- *A substantial increase in the share of employment in Services, which increased from 23% to 42% of covered employment in Lane County.*
- *A decrease in the share of employment in Retail Trade, from 21% to 13%. The number of jobs in retail did not decrease substantially over the 27-year period (a loss of nearly 550 retail jobs) but growth in retail jobs lagged behind growth in other sectors, especially service sectors.*
- *A decline in the share of employment in Manufacturing, which fell from 20% to 13% of covered employment.*
- *A decline in the share of employment in Government, which decreased from 20% to 16% of covered employment.*
- *Other sectors of the County's economy have a relatively stable and small share of the County's employment.*
- *Historical employment trends show a substantial shift in the Region's economy that mirrored shifts in the State and national economies, specifically the substantial growth in Services and decline of Manufacturing. While these trends are expected to continue into the future, future shifts are not expected to be as dramatic as those experienced over the past twenty years."*

[42] CIBL/EOA, p. 49

The EOA explains why it is expected that the future employment mix will be somewhat different that the past:

- *"Growth in the Services sector has matured and should track more closely with overall employment and population growth rather than continuing to gain a substantial share of total employment.*

- *The decline in Manufacturing was due, in part, to decreased timber harvests and the outsourcing of production to facilities in countries with lower costs. Timber harvests are expected to level off and increase in the future as commercial forests that were replanted since the 1970s grow to a harvestable size. While outsourcing will continue, much of what can be outsourced has already gone. Remaining Manufacturing firms are tied to their region to be near supplies or markets, or manufacture specialized goods were small production quantities, fast turn-around times, and the need for quality limit the ability to outsource."*

- *The mix of Manufacturing jobs in the Eugene-Springfield Region changed over the past twenty years with declines in Wood Products and the growth of employment in Recreational Vehicle (RV) manufacturing, machinery manufacturing, metals manufacturing, and high-tech industries, such as Computer and Electronics Manufacturing."*[43]

<u>Major categories of industrial or other employment uses.</u> EOA Chapter 4 pp. 61-75 identifies the major categories of industrial or other employment uses that could reasonably be expected to locate or expand in the Springfield planning area, based on the information about national, state, regional, county or local trends in Chapter 3 (pp. 43-58); and based on Springfield's possession of the appropriate locational factors for the use or category of use as described in Chapter 3, pp. 54-58 "Springfield's Comparative Advantages."

Page 61-68 explain ECONorthwest's methods and rationale for assessing business that are likely to have future growth in Springfield. ECO examined relative concentration and employment growth of existing business sectors, and relationships and linkages within industries. ECO reasoned that "sectors *that are highly concentrated (meaning there are more than the "average" number of businesses in a sector in a given area) and have had high employment growth are likely to be successful industrial clusters. Sectors with either high concentration of businesses or high employment group may be part of an emerging cluster, with potential for future growth."*

Based on this analysis and verified by input received through the public involvement process,[44] ECO and the City reasoned that the sectors with the most growth potential are: Health and Social Assistance; Administrative and Support; Construction; and Accommodations and Food Services. Other sectors with

[43] CIBL/EOA pp. 49, 61-62

[44] The CIBL Stakeholder Committee and CIBL Technical Advisory Committee processes are fully documented in the record and on the City's website. CIBL/EOA Appendix D describes the public input the City received to identify Economic Development Objectives and Strategies and potential policies.

growth opportunities are: Arts, Entertainment, and Recreation; Management of Companies and Enterprises; Professional, Scientific, and Technical Services; and Private Educational Services.[45]

ECONorthwest's methods and rationale for assessing business that are likely to have future growth in Springfield is reasonable and consistent with the law.

Existing and potential growth industries and business clusters. CIBL/EOA Table 4-1, Existing and potential growth industries and business clusters in Springfield identifies the following clusters: Medical Services, Manufacturing , Wood Products and Specialty Wood Products, Call Centers, Back-Office Functions, Tourism, High-tech (Software development, Computer electronics, Computer service providers, Data centers), and Biotech **(***Springfield has advantages in attracting Biotech firms because of the University of Oregon's work in Biotech, presence of Invitrogen, and national growth in the industry.*)

In Table 4-1, ECO identified existing[46] and potential growth industries and business clusters in Springfield with employment potential and "secondary employment" businesses associated with each category. For example, "secondary employment" business growth associated with Springfield's RiverBend Regional Medical Center and McKenzie Willamette Hospital Medical Services cluster include Medical Services and Suppliers, Research and Education, Medical equipment manufacturing, Non-medical office space, and services such as retail, restaurants, financial services, etc.

Types of manufacturing[47] firms with potential growth in Springfield include:

- Food processing[48]
- High-tech electronics[49]
- Recreational Equipment
- Medical Equipment manufacturing.
- Furniture manufacturing
- Specialty apparel
- Cottage industries such as jewelry, apparel, or personal care products
- Plastics manufacturing.

Associated businesses are manufacturing of related or complementary products, additional manufacturing, and services such as retail, restaurants, financial services, etc. [50]

ECONorthwest's methods and rationale for assessing existing and potential growth industries and business clusters in Springfield with employment potential and "secondary employment" businesses

[45] CIBL/EOA p. 62-63
[46] "Top Thirty Springfield Employers", employment data, 2015
[47] Information about the local/regional manufacturing: Livability Lane Cluster Analysis: Manufacturing Cluster Report, 2014.
[48] Information about the local/regional Food & Beverage industry: Livability Lane Cluster Analysis: Food/Beverage Cluster Report, 2014; and "Doing Business in Oregon" 2012 Food processing.
[49] Information about the local/regional tech industry is in the record: Livability Lane Cluster Analysis: EduTech Cluster Report, 2014.
[50] Ibid.

associated with each category that are likely to have future growth in Springfield is reasonable and consistent with the law.

The EOA (p. 64) identifies "Target Industries" for Springfield, based on a range of factors:

- *"Springfield's existing employment base and the clusters of businesses in Springfield, such as those shown in Table 4-1, Table A-12, or Table A-7.*
- *Springfield's comparative advantages, especially Springfield's location in the Southern Willamette Valley next to Eugene, the easy access to Interstate 5 in Springfield, and the availability of educated and trained labor force from across the region.*
- *Local and regional economic trends, such as changes in regional employment (Table A-5), changes in regional business clusters, growth in tourism (Table A-13), growth in agriculture production (Table A-14), or forecasts for regional employment growth (Table A-16).*
- *National and statewide economic trends over the last three decades, such as growth in services or decline in wood products manufacturing.*
- *Local and regional demographic trends*
- *Springfield's economic development objectives, such as:*
    - *Increasing employment in regional clusters, including: Health Care, Communication Equipment, Information Technology (Software), Metals (Wholesalers), Processed Food and Beverage, Wood & Forest Products, and Transportation Equipment.*
    - *Recruiting businesses that pay higher than average wages for the region."*

ECO reasoned (with input from the public, CIBL Stakeholder Committee, Technical Advisory Committee, Planning Commission and City Council) that *"the characteristics of Springfield will affect the types of businesses most likely to locate in Springfield. Springfield's attributes that may attract firms are: the City's proximity to I-5, high quality of life, proximity to the University of Oregon, the presence of the RiverBend campus, positive business climate, availability of skilled and semi-skilled labor, and proximity to indoor and outdoor recreational opportunities. The types of businesses that may be attractive to Springfield include medical services, services for seniors, manufacturing (small scale and large), specialty food processing, high-tech, professional and technical services, call centers, back office functions, tourism, green businesses, corporate headquarters, services for residents, and government and public services."*[51]

The uses or categories of use identified in the CIBL/EOA could reasonably be expected to expand or locate in the Springfield planning area because the Springfield area possesses the appropriate locational factors for the use or category of use.

[51] CIBL/EOA pp. 64-68 list examples of each business type.

ECONorthwest's methods and rationale for identifying target industries with employment potential for the 2010-2030 planning period in Springfield is reasonable, based on empirical evidence, responsive to public input, and consistent with the law.

Conclusions: OAR 660-009-0015(1) and (4).

As explained in the summary and findings above, the City's CIBL/EOA identifies the major categories of industrial or other employment uses that could reasonably be expected to locate or expand in the Springfield planning area based on information about national, state, regional, county or local trends.

The CIBL/EOA uses the review of trends as the principal basis for estimating future industrial and other employment uses as described in section (4) of the rule.

The CIBL/EOA describes how Springfield possesses the appropriate locational factors for the use or category of uses that could reasonably be expected to expand or locate in the planning area.

The CIBL/EOA provides an analysis of trends affecting Springfield in the context of the region, county and state and Springfield's comparative advantages to assess Springfield's community economic development potential pursuant to section (4) of the rule.

Thus, the City's Economic Opportunities Analysis meets the requirement of OAR 660-009-0015 (1) and (4).

The City's 2030 Plan Amendments amend the comprehensive plan to provide an economic opportunities analysis containing the information described in OAR 660-009-0015 (1) and (4).

OAR 660-009-0015(2) Identification of Required Site Types.

> *"The economic opportunities analysis must identify the number of sites by type reasonably expected to be needed to accommodate the expected employment growth based on the site characteristics typical of expected uses. Cities and counties are encouraged to examine existing firms in the planning area to identify the types of sites that may be needed for expansion. Industrial or other employment uses with compatible site characteristics may be grouped together into common site categories."*

This section of Goal 9 rule requires the City's analysis to determine the types, sizes and characteristics of sites of "typical of expected uses", and to determine how many sites of each type are needed to accommodate the expected employment growth. The City is encouraged to base their decision about the types of sites needed by examining existing firms in the planning area.

As explained under OAR 660-009-0015(1), the City's analysis identified existing and potential employers and growth industries based on historical patterns, workforce, locational factors, Springfield's comparative advantages and Springfield's economic development objectives and strategies. It is reasonable to expect that existing uses and target industry uses will expand in or locate in Springfield over the 2010-2030 planning period if land possessing *"the appropriate locational factors for the use or category of use"* is so designated within the planning area to accommodate those uses.

The analysis examined existing firms in the planning area as basis for its decision about the types of sites needed. For example, the average size of commercial and mixed use sites 20 acres and larger is 60 acres and the average size of industrial sites 20 acres and larger is 63 acres .[52]

Table 4-2 explains how and where existing and target industry land uses are and would be permitted within the designated land supply — if sites possessing the needed site sizes and site characteristics were available. Each target industry is an allowed use within multiple plan designations. The acknowledged comprehensive plan designations, and the acknowledged zoning districts that implement them, allow broad groupings of industrial or other employment uses with compatible site characteristics to be developed within various geographic areas of the City. Permitted uses lists for industrial and other employment uses are stated within the applicable zoning district, (Springfield Development Code Chapter 3 Land Use Districts) consistent with the broad categories of land use designations at the metropolitan scale as described in Metro Plan pages II-G-4 to II-G-13 and as amended through the subject 2030 Plan Metro Plan text amendments.

Table 4-2. Target Industries and Plan Designations

Target Industry	Plan Designation										
	Campus Industrial	Commercial	Commercial Mixed Use	Heavy Industrial	High Density Residential Mixed Use	Light Medium Industrial	Light Medium Industrial Mixed Use	Major Retail Center	Medium Density Residential Mixed Use	Mixed Use	Special Heavy Industrial
Medical Services		✔	✔		✔		✔		✔	✔	
Services for Seniors		✔	✔		✔			✔	✔	✔	
Manufacturing	✔			✔		✔	✔			✔	✔
Specialty Food Processing	✔			✔		✔	✔			✔	✔
High-Tech	✔					✔	✔			✔	✔
Professional and Technical Services	✔	✔	✔		✔		✔	✔	✔	✔	
Call Centers	✔		✔				✔			✔	
Back Office Functions	✔		✔			✔	✔			✔	
Tourism		✔	✔				✔	✔		✔	
Green Businesses	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
Corporate Headquarters	✔	✔	✔		✔		✔		✔	✔	
Services for Residents		✔	✔		✔		✔	✔	✔	✔	
Government and Public Services	✔	✔	✔							✔	

ECONorthwest, CIBL/EOA Table 4-2, p. 69

[52] CIBL/EOA p. 78, Table 5-2 Average size of needed sites based on average sizes of sites with employment in Springfield, ECONorthwest based on QCEW data

As stated in OAR 660-009-0025 (1),

> *"Plans do not need to provide a different type of site for each industrial or other employment use. Compatible uses with similar site characteristics may be combined into broad site categories. Several broad site categories will provide for industrial and other employment uses likely to occur in most planning areas. Cities and counties may also designate mixed-use zones to meet multiple needs in a given location."*

The City's 2030 Plan amendments assume that future industrial or other employment uses will locate within lands inside the existing UGB that are designated as shown in Table 4-2 above, and on sites to be added to the UGB to accommodate the City's deficit of sites larger than 5 acres. Appendix C explains how the employment forecast was converted to site needs by site size and type of building. It is reasonable to assume that industrial uses will primarily locate in industrial or campus industrial zones. Retail and service uses could locate in commercial zones, mixed use zones, and residential mixed-use zones.[53]

Employment Forecast. CIBL/EOA pages 70-72 and Appendix C explain the data sources and analytical methods used by the City's consultant ECONorthwest (ECO) to determine the employment growth to be expected. On page 156, ECO explains that the safe harbor in OAR 660-024-0040(9)(a)(A) was used.[54] CIBL/EOA page 70-72 presents a 2010-2030 projection of future employment levels in Springfield for the purpose of estimating demand for commercial and industrial land.

> "*The City's intent was to adopt this EOA in 2010 and the City noticed DLCD of this intent on October 30, 2009.[55] As a result, the employment forecast was developed in 2008 and is based on 2006 Quarterly Census of Employment and Wages (QCEW) data. Appendix C presents the process used to arrive at the employment forecast for Springfield. Table 4-3 shows that employment is forecast to grow by 13,440 employees (a 32% increase) between 2010 and 2030."*

As shown in Table 4-3, and as explained in Appendix C, pp. 155-156, the employment forecast for 2010-2030 shows employment growth of 13,440 total jobs.

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[53] CIBL/EOA p. 73

[54] Springfield is part of Oregon Employment Department's Region 5, which includes Lane County.

[55] Springfield submitted notice to adopt Economic Opportunities Analysis policy amendments and a UGB amendment to DLCD on December 31st, 2009, with a first evidentiary hearing on February 17, 2010. This notice included the 2009 Economic Opportunities Analysis. The October notice to DLCD was in advance of an earlier hearing on the provisional Draft CIBL/EOA which was adopted by City Council Resolution.

Table 4-3. Employment growth in Springfield's UGB, 2010–2040

Year	Total Employment
2008	41,133
2010	42,284
2030	55,724
2030	55,724
2031	56,498
2032	57,283
2033	58,079
2034	58,886
2035	59,704
2036	60,534
2037	61,375
2038	62,228
2039	63,093
2040	63,970
Change 2010 to 2030	
Employees	13,440
Percent	32%
AAGR	1.4%

Source: ECONorthwest

Forecast of employment growth by building type. Next, ECO allocated employment to building types to determine the number of sites needed to accommodate the forecast growth based on the site characteristics typical of expected uses. The number of sites needed is dependent upon the site requirements of employers. ECO grouped employment into building types with similar building and site requirements.

> *"For example, the following service sectors were grouped together into the "office" building type because they need similar types of built space with similar site requirements: information, finance, real estate, professional services, management of companies, administrative support, utilities, arts and entertainment, and other services."*

ECO presented a forecast of employment growth by building type. (Table C-3, p. 157 and Table 4-4, p. 72). The forecast in Table C-3 assumes that Springfield will have growth in all categories of employment. It also assumes that the share of employment will increase in other services (2.2% increase in share) and office (1.3% increase in share). At the same time, the share of employment will decrease in general industrial (1.8% decrease in share), warehousing and distribution (1.0% decrease in share), and retail (0.7% decrease in share). In terms of jobs, employment will increase in all of these sectors.[56]

[56] The assumptions about the changes in share of all employment are explained CIBL/EOA pp. 158-159. The employment projections in the CIBL/EOA do not take into account a major jump in employment that could result from the location of one or more large employers in the community during the planning period. "Major economic events such as the successful recruitment of a very large employer are very difficult to include in a study of this nature."

"For the purpose of the Springfield EOA, building types are used to relate employment by industry to site needs. The method used to describe site needs is to group industries based on building and site characteristics. This is consistent with how real estate markets work for urban development—demand for land is derived from demand for space. The type of building and industry is then related to land characteristics needed (e.g., site needs) to accommodate that industry. It is also consistent with OAR 660-009-0015(1) which states "Industrial or other employment uses with compatible site characteristics may be grouped together into common site categories. " For this analysis, ECO relates industries by NAICS codes to building types which are used as a proxy for site needs. Each sector has been uniquely assigned to a "typical" building type, grouped by industrial and commercial uses.

Site needs and site characteristics typical of expected uses. Appendix C explains the process ECO used to convert employment forecast to site needs. The following section of this report explains how the EOA addressed OAR 660-009-0015(2): *"site characteristics typical of expected uses."*

The tables in Appendix C provide data to document typical building and site needs of various industries.[57] In addition to the evidence provided in the CIBL/EOA document, the record provides extensive supplemental evidence to explain the site needs of industries and the typical characteristics of sites that are necessary to support business operations and develop in accordance with applicable Federal, State and Local regulatory requirements.

Table C-5 "Characteristics of Sites Needed to Accommodate Employment Growth"[58] presents and explains common site needs for expected industrial and other employment uses. Table C-5 summarizes 14 site attributes and explains how each attributes aligns with Springfield sites: flat site; parcel configuration and parking; soil type; road, rail, air, transit transportation; pedestrian and bicycle facilities; labor force; amenities; fiber optics and telephone; potable water; power requirements, and land use buffers.

Key points from Table C-5:

- *"Large Industrial and Commercial firms that require on-site parking or truck access are attracted to sites that offer adequate flexibility in site circulation and building layout. Parking ratios of 0.5 to 2 spaces per 1,000 square feet for Industrial and 2 to 3 spaces per 1,000 square feet for Commercial are typical ratios for these firms. In general rectangular sites are preferred, with a parcel width of at least 200-feet and length that is at least two times the width for build-to-suit sites. Parcel width of at least 400 feet is desired for flexible industrial/business park developments and the largest Commercial users.*

[57] CIBL/EOA p. 71-72
[58] CIBL/EOA. P. 167-169

- *All firms are heavily dependent upon surface transportation for efficient movement of goods, customers, and workers. Access to an adequate highway and arterial roadway network is needed for all industries. Close proximity to a highway or arterial roadway is critical for firms that generate a large volume of truck or auto trips or for firms that rely on visibility from passing traffic to help generate business.*

- *Businesses in Springfield have access to I-5, Highway 126, Highway 99 (in Eugene), and Highway 58. The Gateway area is highly visible from I-5. Springfield also has a well-developed street network within the City. The City may need to work with large businesses to increase automotive capacity in newly developed areas or in areas where the intensity of employment uses increase substantially.*

- *Rail access can be very important to certain types of heavy industries. The region has good rail access to many industrial sites. Springfield is served by multiple Union Pacific rail lines. There are two primary junctions in Springfield: (1) the Springfield Junction is located in the Glenwood area in Southwest Springfield and (2) the Mohawk Junction is near the city's southern boundary, near 25th St.*

- *Proximity to air transportation is important for some firms engaged in manufacturing, finance, or business services. Springfield is located 15 miles from the Eugene Airport.*

- *Transit access is important for Springfield's target industries, especially those with many employees and customers and for businesses that employ and serve segments of the population without access to an automobile. Springfield has access to transit through the Lane Transit District (LTD). There are multiple bus lines that run throughout Springfield and multiple buses that connect Springfield and Eugene. The first two lines of the EmX bus rapid transit system have been completed and serve existing employment nodes in Glenwood, Downtown and RiverBend/Gateway. Additional Frequent Transit Network (FTN) routes are identified in the Regional Transportation Plan. In 2016, The Main Street Corridor FTN route is being planned.*

- *The ability for workers to access amenities and support services such as shopping, entertainment and recreation areas by foot or bike is increasingly important to employers, particularly those with high-wage professional jobs. The need for safe and efficient bicycle and pedestrian networks will prove their importance over time as support services and neighborhoods are developed adjacent to employment centers. Springfield has pedestrian and bicycle facilities.*

Springfield last updated the City Bicycle Plan in 1998. The plan proposes expansion of bicycle facilities to improve bicycle connectivity throughout the City and to neighboring communities. People in Springfield are able to use bicycle facilities for commuting if they live and work in areas of the City that have bicycle infrastructure. Commuting via pedestrian facilities may be more limited to people who live near their work. Springfield's pedestrian and bicycle facilities can be used on conjunction with LTD buses to provide opportunities for alternative methods of commuting for people that live further from work.

- *According to the International Economic Development Council,[59] attracting and retaining skilled workers requires that firms seek out places offering a high quality of life that is vibrant and exciting for a wide range of people and lifestyles. Springfield offers access to outdoor amenities and an excellent parks and recreation district (Willamalane). Many urban amenities are available in Springfield and Eugene.*

- *Most, if not all industries expect access to multiple phone lines, a full range of telecommunication services, and high-speed internet communications. Springfield has access to high-speed telecommunications facilities.*

- *Potable water needs range from domestic levels to 1,000,000 gallons or more per day for some manufacturing firms. However, emerging technologies are allowing manufacturers to rely on recycled water with limited on-site water storage and filter treatment. The demand for water for fire suppression also varies widely. Springfield has sufficient potable water to meet current and expected needs.*

- *Electricity power requirements range from redundant (uninterrupted, multi-sourced supply) 115 kva to 230 kva. Average daily power demand (as measured in kilowatt hours) generally ranges from approximately 5,000 kwh for small business service operations to 30,000 kwh for very large manufacturing operations. The highest power requirements are associated with manufacturing firms, particularly fabricated metal and electronics. For comparison, the typical household requires 2,500 kwh per day. Springfield has access to sufficient power supply to accommodate most commercial and industrial users.*

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[59] International Economic Development Council. "Economic Development Reference Guide," http://www.iedconline.org/hotlinks/SiteSel.html. 10/25/02.

- *According to the public officials and developers/brokers ECO has interviewed, industrial areas have operational characteristics that do not blend as well with residential land uses as they do with Office and Commercial areas. Generally, as the function of industrial use intensifies (e.g., heavy manufacturing) so too does the importance of buffering to mitigate impacts of noise, odors, traffic, and 24-hour 7-day week operations. Adequate buffers may consist of vegetation, landscaped swales, roadways, and public use parks/recreation areas. Depending upon the industrial use and site topography, site buffers range from approximately 50 to 100 feet. Selected commercial office, retail, lodging and mixed use (e.g., apartments or office over retail) activities are becoming acceptable adjacent uses to some light industrial areas. Springfield's employment sites are generally located in areas where employment is compatible with other development. In areas where employment is not directly compatible with adjacent uses, the City may require buffers between incompatible uses."*

Site needs data. CIBL/EOA Table C-6 through Table C-11 present data from a range of sources describing site needs attributes of businesses that either considered locating in Oregon (including in the Eugene-Springfield area) or are industries within one or more of Springfield's target growth sectors or clusters. These examples are presented in the CIBL/EOA to illustrate that businesses have a wide range of need for site size, location, and characteristics based on the business's individual operational needs. "The site needs of businesses vary from business to business, even within the same industry. As a result, one business's site needs may be different and potentially even conflicting with another business's site needs."[60]

Long term and short term site needs are estimated in CIBL/EOA pp. 72-75:

- *"Types of needed sites are based on the site characteristics typical of expected uses."*

- *"The Goal 9 rule provides flexibility in how jurisdictions conduct and organize this analysis. For example, site types can be described by plan designation (i.e., heavy or light industrial), they can be by general size categories that are defined locally (i.e., small, medium, or large sites), or it can be industry or use-based (i.e., manufacturing sites or distribution sites)."*

- *"Firms wanting to expand or locate in Springfield will be looking for a variety of site and building characteristics, depending on the industry and specific circumstances. Previous research conducted by ECO has found that while there*

[60] CIBL/EOA, p. 170-178. The record provides additional evidence to describe the characteristics of sites needed to accommodate industrial and other employment growth target industries, including industries that require sites 20-acres and larger.

are always specific criteria that are industry-dependent and specific firm, many firms share at least a few common site criteria. In general, all firms need sites that are relatively flat, free of natural or regulatory constraints on development, with good transportation access and adequate public services. The exact amount, quality, and relative importance of these factors vary among different types of firms. This section discusses the site requirements for firms in industries with growth potential in the Eugene-Springfield Region, as indicated by the Oregon Employment Department forecast (see Table A-12 in Appendix A for the regional forecast)."

Conclusions: OAR 660-009-0015(2). The CIBL/EOA Appendix C presents a detailed analysis of Springfield's site needs and site characteristics consistent with OAR 660-009-0015(2) and OAR 660-009-0025(1).

The CIBL/EOA, Appendix C and the record provide ample evidence explaining how the City's examination of existing firms in the planning area was used to identify the types of sites that may be needed for expansion.

The City's analysis grouped Industrial or other employment uses with compatible site characteristics into common site categories.

Appendix C discusses the factors that affect business' locational decisions and how these factors influence the decisions of businesses that may choose to expand or locate in Springfield. Appendix C describes and explains the characteristics of sites needed to accommodate employment growth and Springfield's ability to provide sites possessing those characteristics.

The City's CIBL/EOA provides identification of required site types based on the site characteristics typical of expected uses (CIBL/EOA pp. 82-95, and Appendix C).

The City's CIBL/EOA provides identification of required site types consistent with the requirements of OAR 660-009-0015(2).

The City's 2030 Plan Amendments amend the comprehensive plan to provide an economic opportunities analysis containing the information described in OAR 660-009-0015(2).

OAR 660-009-0015(3) Inventory of Industrial and Other Employment Lands states:

"Comprehensive plans for all areas within urban growth boundaries must include an inventory of vacant and developed lands within the planning area designated for industrial or other employment use.

(a) For sites inventoried under this section, plans must provide the following information:

(A) The description, including site characteristics, of vacant or developed sites within each plan or zoning district;

(B) A description of any development constraints or infrastructure needs that affect the buildable area of sites in the inventory; and

(C) For cities and counties within a Metropolitan Planning Organization, the inventory must also include the approximate total acreage and percentage of sites within each plan or zoning district that comprise the short-term supply of land.

(b) When comparing current land supply to the projected demand, cities and counties may inventory contiguous lots or parcels together that are within a discrete plan or zoning district.

(c) Cities and counties that adopt objectives or policies providing for prime industrial land pursuant to OAR 660-009-0020(6) and 660-009-0025(8) must identify and inventory any vacant or developed prime industrial land according to section (3)(a) of this rule."

<u>CIBL Inventory of Vacant and Potentially Redevelopable Land.</u> The City's 2030 Plan Amendments to the Metro Plan include an inventory of vacant and developed lands within the planning area designated for industrial or other employment use. Springfield commissioned ECONorthwest in 2008 to conduct the inventory and to prepare the necessary factual base for the Plan. CIBL/EOA Chapter 2 Land Available for Industrial and Other Employment Uses, pp. 5-41 presents the inventory.

As explained on page 5, ECONorthwest used the best available or readily collectable information: GIS data provided by the City Technical Services Division and Lane Council of Governments, aerial orthophotographs, and verification by City staff. ECO worked closely ECO worked closely with City Staff, a Technical Advisory Committee, and a Stakeholder Committee during the development and review of the Springfield commercial and industrial buildable lands inventory (CIBL). ECO developed the inventory using the following steps:

- *Assemble and document datasets*. ECO identified data from the Regional Land Information Database (RLID) and GIS data from the City of Springfield and the Lane Council of Governments as primary datasets on which the inventory and analysis was built. RLID includes assessment and taxation data maintained by Lane County.

- *Preliminary analysis*. ECO conducted a preliminary analysis with the GIS and data tables selected for inclusion in the database. The purpose of this task was to work with City staff and the TAC to determine the optimal definitions and supporting methodology to base the final analysis and database structure.

- *Data processing and GIS analysis.* In this step ECO performed the GIS analysis and data processing steps necessary to populate the database. Table 2-1[61] shows plan designations that were included in the commercial and industrial buildable lands inventory.[62] All of the designations included in the inventory allow employment outright. The inventory, however, includes several mixed use designations that allow both employment and housing. The inventory generally uses the 2004 Metro Plan designations with two exceptions: (1) Glenwood, where a 2005 plan amendment changed the designation on approximately 47 acres from Light Medium Industrial Mixed Use to Mixed Use; (2) the PeaceHealth site where land was redesignated from residential to designations that allow employment; and (3) the Marcola Meadows site that included a plan designation change from Campus Industrial to Medium Density Residential/Nodal Development, Mixed-Use Commercial/Nodal Development, and Community Commercial. The implication of these exceptions was to include land that would not have otherwise been included in the inventory. The intent of this step was to increase the accuracy of the inventory.

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

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

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

OAR 660-009-0015(3)(a)(A) The description, including site characteristics, of vacant or developed sites within each plan or zoning district;

[61] CIBL/EOA p. 7.

[62] Between the 2009 Draft CIBL/EOA and 2015 Final CIBL/EOA, some updates were made to Chapter 2. Text was added to clarify data and methodologies used in the BLI. The column titles were updated to clarify the results of the BLI in some tables. The results of the buildable lands inventory were not revised as part of this update. The inventory was prepared for the planning period 2010-2030.

Metro Plan Chapter II, pages II-G-4 through II-G-12, as amended by the City's subject proposal, provides general descriptions and site characteristics of vacant or developed sites within the land use districts that provide sites for industrial and other employment uses. Seven acknowledged neighborhood refinement plans (Downtown, Gateway, Glenwood, Kelly Butte, East Main, Q Street, and Mid Springfield) and approved Master Plans provide more refined descriptions and site characteristics of vacant or developed sites within the land use districts that provide sites planned and zoned for industrial and other employment uses. The Springfield Development Code Chapter 3 provides descriptions and site characteristics of the land use districts that provide sites for industrial and other employment uses. Characteristics addressed include required sizes of plan districts, parcel sizes, minimum development areas, use categories, operational performance standards.[63]

The City's development regulations in Springfield Development Code Chapter 4 implement Metro Plan policies, State and Federal law and thus are germane to any discussion of site characteristics. [OAR 660-009-0015(3)(a) A and B].[64] The policies of the comprehensive plan, as implemented through the City's development standards in SDC Chapter 3 and 4 provide descriptions of land planned and zoned for employment uses, including physical and operational requirements that influence the development area size and configuration needed to operate a use and the placement of development on a site in relationship to public rights of way and abutting land uses. [65]

The City's land use approvals of the RiverBend and Marcola Meadows Master Plans impose additional standards and requirements pertaining to development of employment uses within those areas. Both Master Plans describe land planned and zoned for employment uses and address physical and operational requirements that influence the development area size and configuration needed to operate a use and the placement of development on a site in relationship to public rights of way and abutting land uses.[66]

Springfield's existing acknowledged comprehensive plan and land use regulations identify lands planned and zoned for continued and increased economic growth and activity.

The City's inventory provides the description, including site characteristics, of vacant or developed sites within each plan or zoning district [OAR 660-009-0015(3)(a)(A).

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[63] For example, SDC 3.2 -420 and 425 Springfield's Campus Industrial Zoning District standards regulate minimum parcel sizes, frontages, lot coverage, setbacks, parking, driveway and outdoor storage, landscaped buffers, movement of heavy equipment, storage of materials, air pollution controls, reduction of glare from lighting, groundwater protection, hazardous waste, noise, radiation and vibration.

[64] For example, SDC 4.1-100 regulates street width, block length, site access and driveways, intersections, vision clearances, sidewalks, street trees, bikeways, and accessways. SDC 4.3-110 to 117 regulates on-site stormwater management, water quality and natural resource protection.

[65] See Exhibit F-1 Supplemental Findings, pp. 1-42 for discussion of CIBL inventory assumptions, policy choices, industrial sites, and the portion of employment land site needs to be met through redevelopment.

[66] See Exhibit F-1 Supplemental Findings, p. 14-16; City File No. LRP2007-00028 The Villages at Marcola Meadows Final Master Plan, approved July 3, 2008, recorded July 25, 2008.

CIBL/ EOA Chapter 2, (pp. 5-41) provides explanation of the systematic process ECO employed to complete Springfield's inventory. Pages 8-12 provide explanation of how ECO classified each tax lots as "vacant", "developed" or "potentially redevelopable." The City's definition of vacant land is more inclusive than what statewide planning policy requires. The implication of using a more inclusive definition are that more land was considered available in the inventory than would be if the state definitions were used.

CIBL/ EOA Map 2-1[67] presents the Metro plan designations used in for inventory purposes.

As shown in CIBL/EOA Map 2-1 Existing Plan Designations, Springfield's previously-designated existing land base will provide sites for commercial and industrial land uses over the planning period, on vacant land, and on land where redevelopment is expected to occur.

OAR 660-009-0015 (3)(a)(B) description of any development constraints or infrastructure needs that affect the buildable area of sites in the inventory

Development constraints applied in the Springfield CIBL/EOA. OAR 660-009-0015 (3)(a)(B) requires the inventory to provide "*A description of any development constraints or infrastructure needs that affect the buildable area of sites in the inventory.*" CIBL/EOA pp. 14-16 presents a description of development constraints or infrastructure needs that affect the buildable area of sites in Springfield's inventory.

Development constraints are defined in OAR 660-009-0005(2):

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

The rule leaves discretion for local governments in the application of the definition.

> *"For the purpose of this CIBL/EOA, the following factors are considered "absolute development constraints" which make employment land unsuitable for development:*[68]

- *Wetlands – Source: City of Springfield Local Wetland Inventory. File used: wet_lwi.shp, accessed 2008*
- *Floodway – Source: Army Corps of Engineers digital "FIRM" maps. File used: fld_way.shp, accessed 2008*

[67] CIBL/EOA, p. 13.
[68] Each of these files was provided to ECONorthwest by the City in 2008.

- *Slopes over 15% - Source: 10 meter digital elevation model (DEM). File used: slopes_over_15.shp, accessed 2008*
- *Riparian resource areas – Source: City of Springfield. File used: Riparian_resource_areas.shp, accessed 2008*

  The following factors were assumed "partial development constraints" in the CIBL/EOA. Partial constraints are factors that may create difficulties in development, but do not preclude development. Partial constraints were not deducted from the inventory. Land with these constraints is classified as "constrained" on employment land. Development can occur on "constrained" land and no deductions were made from the inventory for these factors.[69]

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

ECONorthwest used a systematic process to prepare Springfield's Commercial and Industrial land inventory.

> *"Processing and analyzing data from the Lane Council of Governments (LCOG) land use database (a database that inventories land uses at the sub-tax lot level), ECONorthwest identified the developed or unsuitable portions of tax lots. Areas of partially vacant tax lots with development were included in the "developed acres" category and remainders were considered "suitable"*[70] *(unless they had absolute constraints). The inventory also deducted the "absolute constraints" that make land unsuitable for employment uses. Each of these constraints was available in a GIS format. The four absolute constraints layers were "dissolved" together to create a single "absolute" constrained layer. This was done to avoid double counting since some constraints (e.g., floodways and wetlands) occur in the same place. The combined constraints layer was then used to calculate the portion of the lot that was constrained and therefore unsuitable for development."*[71]

The land base for the inventory the inventory is presented on pp. 17-19 and Map 2-3.

"Vacant" and "potentially redevelopable" land is identified in pp. 21-23 and Maps 2-3, 2-4 and 2-5, pp. 24-26.

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[69] Each of these files was provided to ECONorthwest by the City in 2008.
[70] OAR 660-009-0005(12) defines "suitable" land as "serviceable land designated for industrial or other employment use that provides, or can be expected to provide the appropriate site characteristics for the proposed use."
[71] CIBL/EOA pp. 11-12

As shown in CIBL/EOA Map 2-3 Vacant Commercial and Industrial Land, and CIBL/EOA pp. 21-26, portions of this land base are vacant. The City's definition of "vacant" is stated on CIBL/EOA p. 9. Springfield's inventory included more land in the inventory that required by rule. Lands with improvement values under $10,000 were considered vacant.[72]

Springfield's inventory also identified "potentially redevelopable" land where there exists the potential that existing development will be converted to more intensive uses providing more employment capacity during the planning period. This category is discussed on CIBL/EOA p. 9 and 11-12, 21, 27-38, and Map 2-6, p. 32. The CIBL/EOA also includes a parcel–level evaluation of potentially redevelopable sites 5 acres and larger on pp. 33-38.

The City's CIBL inventory of Industrial and Other Employment Lands explains the capacity of vacant, developed and potentially redevelopable sites to meet site needs for the planning period.

The inventory indicates that Springfield has a deficit of suitable sites that are 20 acres and larger, and deficit of sites 5-20 acres in size. After assuming that all site needs for commercial and industrial uses that require sites smaller than 5 acres would be addressed through redevelopment, CIBL/EOA Table 5-4, (p. 80) shows a deficit of 2 industrial sites and 1 commercial and mixed use site 20 acres and larger. Table 5-2 (p. 78) shows the average site size in Springfield for industrial and commercial and mixed use sites 20 acres and larger: 63 acres and 60 acres respectively. Thus Springfield has a need for 126 acres of industrial employment land on 2 sites larger than 20 acres and a need for 97 acres of commercial employment land on 5 sites, including one site that is 60 acres in size.

The City and Lane County amended the Springfield UGB to provide 223 acres of employment land to meet employment land needs that require sites larger than 5 acres.

Conclusions OAR 660-009-0015(3): As amended through the City's 2030 Plan amendments, the comprehensive plan for areas within Springfield's urban growth boundary includes an inventory of vacant and developed lands within the planning area designated for industrial or other employment use that provides the information required in OAR 660-009-0015(3)(a),(b) and (c) because the plan includes a description of the land, development constraints and the approximate total acreage of the sites that comprise the short-term supply of land.

OAR 660-009-0015(3)(a)(C): Short-term supply of land

> *"For cities and counties within a Metropolitan Planning Organization, the inventory must also include the approximate total acreage and percentage of sites within each plan or zoning district that comprise the short-term supply of land."*

[72] See Exhibit F-1 Supplemental Findings, pp. 38-42.

The CIBL/EOA pp. 39-41 addresses the requirement for cities within MPOs to make commitments to provide competitive short-term supplies of land. The CIBL/EOA provides an assessment of Springfield's short-term land supply. With the exception of the southern extent of the Jasper-Natron area, all commercial and industrial lands within the existing UGB can be considered to technically meet the Goal 9 rule criteria of "engineering feasibility." [OAR 660-009-0020(1)(b), OAR 660-009-0025]. Thus more than 91% of the vacant commercial and industrial land is considered available as short term supply, and more the 85%.

The CIBL/EOA includes the approximate total acreage and percentage of sites within each plan or zoning district that comprise the short-term supply of land. [OAR 660-009-0015(3)(a)(C)]

OAR 660-009-0015(3)(a)(C)(c) vacant or developed prime industrial land

> *"Cities and counties that adopt objectives or policies providing for prime industrial land pursuant to OAR 660-009-0020(6) and 660-009-0025(8) must identify and inventory any vacant or developed prime industrial land according to section (3)(a) of this rule."*

OAR 660-009-0020(6)/OAR 660-009-0025(8) special siting characteristics

The City's CIBL/EOA identifies a need for suitable employment land to accommodate uses with "special siting characteristics,"[73] thus OAR 660-009-0025(8) and OAR 660-009-0015(3)(a)(C)(c) are applicable.

As amended through the City's 2030 Plan amendments, the comprehensive plan for areas within Springfield's urban growth boundary includes an inventory of vacant and developed lands within the planning area designated for industrial or other employment use that provides the information required in OAR 660-009-0015(3)(a). The City's CIBL inventory of Industrial and Other Employment Lands explains the capacity of vacant, developed and potentially redevelopable sites to meet site needs for the planning period. The inventory indicates that Springfield has a deficit of suitable sites that are 20 acres and larger, and deficit of sites 5-20 acres in size. After assuming that all site needs for commercial and industrial uses that require sites smaller than 5 acres would be addressed through redevelopment[74], CIBL/EOA Table 5-4, (p. 80) shows a deficit of 2 industrial sites and 1 commercial and mixed use site 20 acres and larger. Table 5-2 (p. 78) shows the average site size in Springfield for industrial and commercial and mixed use sites 20 acres and larger: 63 acres and 60 acres respectively. Thus Springfield has a

[73] CIBL/EOA pp. 82-98 identifies target large-scale manufacturers and large office employers that require sites with special characteristics including : site size 20 acres and larger, topography less 5 % / 7%, transportation access as close to I-5 as possible via unimpeded freight route, access to public facilities and services, and sites with two or fewer owners.

[74] CIBL/EOA Table 5-1, p. 78 shows that 188 industrial sites and 340 commercial and mixed use sites would redevelop to address land needs over the 20-year period. In addition to this assumption, Springfield concludes that all land needs on sites smaller than 5 acres would be accommodated through redevelopment, including the 6-acre deficit of 2-5 acre sites shown in Table 5-3, p. 79.

need for 126 acres of industrial employment land on 2 sites larger than 20 acres and a need for 97 acres of commercial employment land on 5 sites, including one site that is 60 acres in size. The City and Lane County amended the Springfield UGB to provide 223 acres of employment land to meet employment land needs that require sites larger than 5 acres.

The City and Lane County adopted policies in the 2030 Comprehensive Plan Urbanization Element and land use regulations in the Springfield Development Code[75] to protect sites 20 acres and larger from land division in order to accommodate uses that require sites 20 acres and larger.

Conclusion OAR 660-009-0015(3): The CIBL/EOA provides an inventory of industrial and other employment lands consistent with all applicable requirements of the rule.

OAR 660-009-0015(4) Assessment of Community Economic Development Potential

> *"The economic opportunities analysis must estimate the types and amounts of industrial and other employment uses likely to occur in the planning area. The estimate must be based on information generated in response to sections (1) to (3) of this rule and must consider the planning area's economic advantages and disadvantages. Relevant economic advantages and disadvantages to be considered may include but are not limited to:*
>
> *(a) Location, size and buying power of markets;*
>
> *(b) Availability of transportation facilities for access and freight mobility;*
>
> *(c) Public facilities and public services;*
>
> *(d) Labor market factors;*
>
> *(e) Access to suppliers and utilities;*
>
> *(f) Necessary support services;*
>
> *(g) Limits on development due to federal and state environmental protection laws; and*
>
> *(h) Educational and technical training programs."*

As previously discussed in this report, the CIBL/EOA estimated the types and amounts of industrial and other employment uses likely to occur in the planning area based on information generated in response to sections (1) to (3) of the Goal 9 rule and in consideration of the Springfield planning area's economic advantages and disadvantages. The CIBL/EOA provides

[75] See Ordinance 6461, Exhibit E: SDC 3.2-900 Agriculture- Urban Holding Area (AG) Zoning District

assessment of relevant economic advantages and disadvantages including but are not limited to factors (a)-(h) in the CIBL/EOA Chapter 3 and 4, pp. 43-68.

Conclusion OAR 660-009-0015(4). The City's CIBL/EOA provides the required assessment of community economic development potential because it specifically considers several of the factors as suggested by the rule such as location, buying power of markets, transportation and public facilities.

OAR 660-009-0015(5) public and state agency involvement to inform community economic development objectives

> *"Cities and counties are strongly encouraged to assess community economic development potential through a visioning or some other public input based process in conjunction with state agencies. Cities and counties are strongly encouraged to use the assessment of community economic development potential to form the community economic development objectives pursuant to OAR 660-009-0020(1)(a).*

As explained in CIBL/EOA Appendix D, Economic Development Objectives and Implementation Strategies[76], the City conducted a visioning process to assess community economic development potential. State economic development agency staff Bob Warren and local DLCD representative Ed Moore participated on the CIBL Technical Advisory Committee. The Committee provided input and advice to the City's consultant ECONorthwest to develop a survey and two visioning workshops[77] to inform preparation of the CIBL/EOA and Economic Development Objectives and Implementation Strategies. As explained in CIBL/EOA Appendix D, the assessment of community economic development potential was used to form the community economic development objectives pursuant to OAR 660-009-0020(1)(a). Input received through the visioning was used to draft potential economic development policies and actions that ultimately were incorporated into the Springfield Comprehensive Plan Economic Element and Urbanization Element policies to address OAR 6660-009-0020.

Conclusion OAR 660-009-0015(5). The City assessed community economic development potential through visioning and other public input processes in conjunction with state agencies. For example, the City obtained guidance and input from citizen stakeholder and technical advisory committees and used the assessment to form the economic development objectives in the CIBL/EOA and as foundation for developing comprehensive plan goals, policies and strategies in the Economic Element.

[76] The local record contains complete documentation of the survey conducted April 4-May 27, 2008 and workshops.
[77] Community workshops conducted May 20, 2008 and July 31, 2008

IVb. Industrial and Other Employment Development Policies

OAR 660-009-0020 Industrial and Other Employment Development Policies

"(1) Comprehensive plans subject to this division must include policies stating the economic development objectives for the planning area. These policies must be based on the community economic opportunities analysis prepared pursuant to OAR 660-009-0015 and must provide the following:

(a) Community Economic Development Objectives. The plan must state the overall objectives for economic development in the planning area and identify categories or particular types of industrial and other employment uses desired by the community. Policy objectives may identify the level of short-term supply of land the planning area needs. Cities and counties are strongly encouraged to select a competitive short-term supply of land as a policy objective.

(b) Commitment to Provide a Competitive Short-Term Supply. Cities and counties within a Metropolitan Planning Organization must adopt a policy stating that a competitive short-term supply of land as a community economic development objective for the industrial and other employment uses selected through the economic opportunities analysis pursuant to OAR 660-009-0015.

(c) Commitment to Provide Adequate Sites and Facilities. The plan must include policies committing the city or county to designate an adequate number of sites of suitable sizes, types and locations. The plan must also include policies, through public facilities planning and transportation system planning, to provide necessary public facilities and transportation facilities for the planning area. Cities and counties must adopt measures adequate to implement policies adopted pursuant to OAR 660-009-0020. Appropriate implementing measures include amendments to plan and zone map designations, land use regulations, public facility plans, and transportation system plans."

OAR 660-009-0020(1)(a) Comprehensive plan policies stating community economic development objectives

As required by OAR 660-009-0020(1)(a), the City and Lane County adopted Ordinance Exhibit B, amending the Metro Plan to establish the Springfield 2030 Comprehensive Plan Economic Element (Exhibit B-1) and its Technical Supplement Springfield CIBL/EOA (Exhibit B-2) as the community economic opportunities analysis, economic development objectives and comprehensive plan policies applicable to Springfield's planning area. The Economic Element is a statement of City's economic development objectives, based on the Springfield CIBL/EOA analysis prepared pursuant to OAR 660-009-0015.

To begin its work to develop the CIBL/EOA in 2008-2009, the City conducted a public involvement process to identify potential industrial and other employment development objectives. CIBL/EOA Appendix D Economic Development Objectives and Strategies is a description of the process and summary of results. The process identified implementation steps toward achieving the objectives, including recommended comprehensive plan policy and code amendments consistent with the strategies.

The CIBL/EOA and Economic Development Objectives and Strategies provided the foundation for the City Council's subsequent policy development for Springfield 2030 Comprehensive Plan Economic Element.

The Springfield 2030 Comprehensive Plan Economic Element Goals, Policies, Implementation Strategies and Analysis (including the Technical Supplement CIBL/EOA) are adopted as amendments to the comprehensive plan, replacing the more general metro-wide goals, objectives, and findings contained in the *Eugene-Springfield Metropolitan Area General Plan* (Metro Plan) Economic Element Chapter IIIB. The Metro Plan policies are based on older land inventories and studies conducted at the regional scale. The Metro plan was acknowledged prior to the State's adoption of OAR 660-009-0015. The Metro area does not have an adopted Economic Opportunities Analysis consistent with Division 9 Administrative Rules.

The Springfield 2030 Comprehensive Plan Economic Element and Economic Opportunities Analysis were prepared and adopted as post-acknowledgement amendments of the comprehensive plan, consistent with Goal 9 and Division 9 Administrative Rules.

The City's 2030 Plan amendments (Ordinance 6361, Exhibits A, B, C, D and E) adopt comprehensive plan policy and code amendments to implement the economic development objectives for Springfield's planning area, based on the community economic opportunities analysis (Exhibit B-2) prepared pursuant to OAR 660-009-0015.

Ordinance 6361, Exhibit B Springfield 2030 Comprehensive Plan Economic Element (Exhibit B-1 and Exhibit B-2 Technical Supplement CIBL/EOA) identifies the goals, policies, implementation strategies and analysis that the City of Springfield, in cooperation with Lane County, has adopted to provide an adequate land supply for economic development and employment growth within Springfield's UGB in compliance with Statewide Planning Goal 9, Economic Development. The economic development policy direction established through adoption of the Springfield Economic Element is focused to capitalize on Springfield's strengths and opportunities within

the broader Southern Willamette Valley region as identified in the 2015 CIBL/EOA. The Springfield Economic Development Planning goals express the desired community development outcomes and economic benefits the City aspires to achieve as it addresses the needs identified in the CIBL/EOA. Springfield Economic Element provides policy direction for updating and amending refinement plans, zoning, and development regulations to address the community's commercial, industrial and other employment development needs over the 2010-2030 planning period. The City's 2030 comprehensive plan policies support the growth of the local, regional and State economy through designation of suitable, serviceable land for economic development. Implementation of the Plan over the 20-year period will support development patterns that integrate land use, transportation, and public facilities planning to sustain a healthy, prosperous and equitable environment aligned with Springfield's interests, values and assets. The City's 2030 Plan policies guide City-initiated updates to land use refinement plans and zoning at the city-wide, district, corridor, and neighborhood scales, and establish policies applicable to property owner-initiated plan amendment or zoning proposals.

The record provides complete documentation of the public process employed by the City to develop the CIBL/EOA, and the Economic Development Objectives and Strategies (CIBL/EOA Appendix D) to identify categories or particular types of industrial and other employment uses desired by the community. The City's findings under OAR 660-009-0015(1) and (2) explain how the CIBL/EOA identifies categories or particular types of industrial and other employment uses.

Conclusion OAR 660-009-0020(1)(a): As amended by the City's 2030 Plan amendments, Springfield's comprehensive plan policies state the economic development objectives for the planning area based on the community economic opportunities analysis prepared pursuant to OAR 660-009-0015. The plan identifies categories or particular types of industrial and other employment uses desired by the community.

OAR 660-009-0020(1)(b) Required policy commitment to provide a competitive short-term supply of land

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

Springfield is within the Central Lane MPO, thus OAR 660-009-0020(1)(b) applies. As stated in the CIBL/EOA, pp 39-40:

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

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

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

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

Springfield 2030 Comprehensive Plan Economic Element Policy E.5 states:

"Provide an adequate, competitive short-term supply of suitable land to respond to economic development opportunities as they arise. "Short-term supply" means suitable land that is ready for construction within one year of an application for a building permit or request for service extension. "Competitive Short-term Supply" means the short-term supply of land provides a range of site sizes and locations to accommodate the market needs of a variety of industrial and other employment uses."

Springfield 2030 Comprehensive Plan Economic Element Policy E.6 states:

"Facilitate short term and long term redevelopment activity and increased efficiency of land use through the urban renewal program, updates to refinement plans and the development review process."

Springfield 2030 Comprehensive Plan Economic Element Policy E.7 states:

"Where possible, concentrate development on sites with existing infrastructure or on sites where infrastructure can be provided relatively easily and at a comparatively low cost."

OAR 660-009-0025(3) provides short-term land supply targets for cities within MPOs:

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

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

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

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

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

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

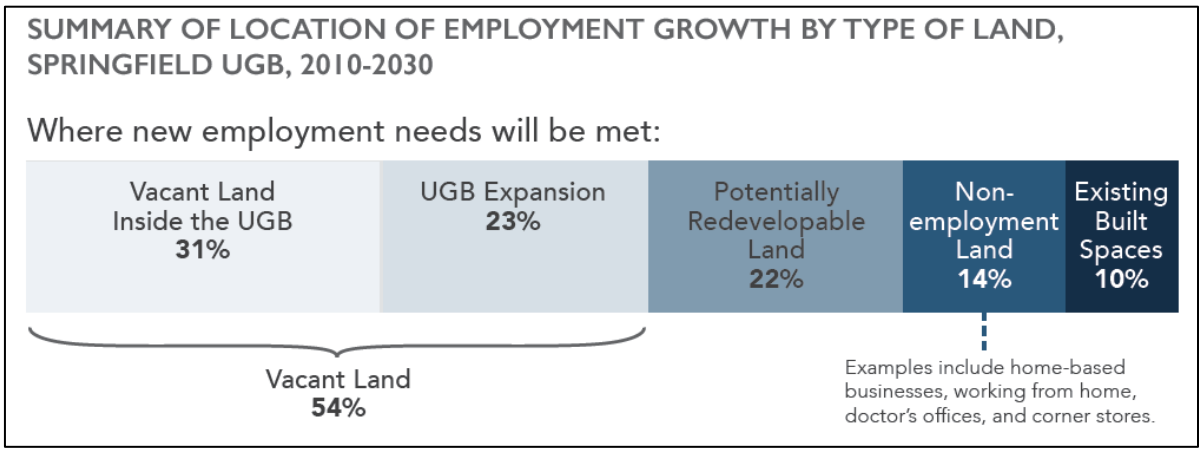
OAR 660-009-0020 (1)(b) and OAR 660-009-0025 (3) Conclusion: The CIBL/EOA provides an analysis of short-term supply on pages 40-41 to demonstrate that most of Springfield's land supply within the existing UGB (91% of vacant commercial and industrial land and 85% of land with redevelopment potential) is considered short-term supply because land can be ready for construction within one year based on "engineering feasibility." Thus the short-term supply meets and exceeds the 25% threshold of OAR 660-009-0025 (3)(a). The City and Lane County adopted Economic Element Policy E.5 to state commitment to providing a competitive short-term supply of land to accommodate industrial and other employment uses it selected through the economic opportunities analysis.

IVc. Policies committing the city to designate an adequate number of sites of suitable sizes, types and locations

OAR 660-009-0020(1)(c) Policy commitment to designate adequate sites and facilities:

"The plan must include policies committing the city or county to designate an adequate number of sites of suitable sizes, types and locations. The plan must also include policies, through public facilities planning and transportation system planning, to provide necessary public facilities and transportation facilities for the planning area."

Designated sites for employment growth. Springfield is required to have comprehensive plan policies that designate "an adequate number of sites of suitable sizes, types and locations" in the Springfield UGB supported by public facilities planning and transportation system planning policies to provide necessary public facilities and transportation facilities for the planning area. The City's CIBL/EOA and 2030 Plan policies assume growth will be distributed as summarized in the following graphic "Summary of Location of Employment Growth by Type of Land".[78]



Land already designated for employment (including non-employment land that supports home-based businesses, working from home, home occupations and neighborhood commercial uses[79]) will provide sites inside the existing UGB on vacant sites, potentially redevelopable sites, non-employment sites, and existing built space sites.

As shown in the graphic above, 77% of employment growth is assumed to occur on land inside the existing UGB as currently designated in the Metro Plan and Springfield's refinement plans, and subject to existing zoning and development standards, and 23% of employment growth is assumed to occur on land added to the UGB. Land inside the existing UGB is subject to existing public facilities planning policies of the *Metro Public Facilities and Services Plan* and existing local and regional transportation planning policies. Thus, 77% of employment growth is already planned to be provided with necessary public facilities and transportation facilities over the planning periods of the facilities plans.

Existing designated and zoned vacant , developed and redevelopable land supply. The City's 2030 Plan adopted inventories, analyses and policies that support employment growth on land already designated for employment uses within the existing UGB. Springfield's inventory of the existing land base designated for commercial and industrial uses is described in CIBL/EOA Chapter 3, (pp. 5-42). Springfield's existing land base designated for commercial and industrial uses is shown and described in the Metro Plan diagram and text and Springfield refinement

[78] ECONorthwest, City of Springfield CIBL for the Planning Period 2010-2030, Summary Report, August 2015.

[79] Metro Plan p. II-G-5 to II-G-6 describes neighborhood commercial facilities (not shown on Metro Plan diagram). Springfield Development Code 3.2-305 describes the Neighborhood Commercial Zoning District.

plans and text. Springfield's existing zoning districts regulate the supply of land for commercial and industrial uses , as listed in the Springfield Development Code Chapter 3 and as described in Sections 3.2-300, 3.2-400, 3.2-500, 3.2-600, 3.3-100, 3.3-200, 3.3-300, 3.3-400, 3.3-500, 3.3-900, 3.3-1000,3.3-1100, 3.4-100, 3.4-200, 3.4-300. Springfield Development Code development regulations for wastewater and stormwater infrastructure (as described in SDC 4.3-100 and the Engineering Design Standards Manual), and transportation (SDC 4.2-200) implement Metro Public Facilities and Services Plan and Springfield Transportation System Plan policies. Springfield Development Code Chapter 3 regulates site development, parking, loading, landscaping and screening and specific uses (SDC 4.7-100).

2030 policy commitments to designate suitable sites, types and locations as identified in the CIBL/EOA to meet employment land needs. The City's 2030 Plan amendments amend the UGB and adopt Economic Element and Urbanization Element policies and strategies committing the City to ensure designation of an adequate number of sites of suitable sizes, types and locations as identified in the CIBL/EOA to meet employment land needs. The policies and implementation strategies commit the City to multiple actions to designate site types, sizes and locations that will diversify the mix of commercial and industrial land in Springfield to address employment land needs. These actions range from expanding the UGB to add 223 acres of suitable large site employment land (sites larger than 20 acres and sites 5-20 acres), to establishing policy direction that will guide future plan and zoning amendments through City refinement planning processes and through review of owner-initiated land use development proposals.

Springfield 2030 Comprehensive Plan (2030 Plan) Economic Element Policy E.1 states:

> ***"Designate an adequate supply of land that is planned and zoned to provide sites of varying locations, configurations, size and characteristics as identified and described in the Economic Opportunity Analysis to accommodate industrial and other employment over the planning period. These sites may include vacant undeveloped land; partially developed sites with potential for additional development through infill development; and sites with redevelopment potential."***

Policy commitments to enable and foster redevelopment. Potentially redevelopable land is shown in CIBL/EOA Map 2-6 (p. 32). CIBL/EOA Table 2-11 (p. 31) identified 11 sites 5 acres and larger as being potentially redevelopable. The City conducted a parcel-level evaluation of these sites.[80] As explained in Table 2-12 (p. 33-38), the City assumes that 7 or these 11 potentially redevelopable sites 5 acres and larger offer redevelopment opportunities in the 2010-2030 planning period. The results of the evaluation of tax lots in Table 2-12 show that one of the seven potentially redevelopable sites is larger than 20 acres and six of the potentially redevelopable sites are 5-20 acres in size. The largest potentially redevelopable site is a 47-

[80] CIBL/EOA pp. 33-39

acre parcel in the Jasper-Natron Special Heavy Industrial District (Taxlot: 1802100000200).

This site has approximately 36 acres of unconstrained land, divided by seven separate areas of inventoried wetlands. Given the configuration of absolute constraints on this parcel, the City reasoned that the site could provide redevelopment opportunity on 36 acres, across two or more areas within the site.[81] The City reasoned that this site could provide one of the City's needed sites 20 acres and larger. The site is currently designated "Special Heavy Industrial." Metro Plan p. II-G-8 describes the Special Heavy Industrial (SHI) designation. *"This designation accommodates industrial development that need large parcels, particularly those with rail access."*

As described in CIBL/EOA Table 2-12 (p. 33), the rail spur that formerly served the 47-acre "Natron" site was eliminated when the Straub Parkway was constructed. Staff met with the Union Pacific Industrial Lands Specialist to confirm that this site is no longer accessible by rail. The site is constrained by seven areas of wetlands and a BPA easement. The City reasoned that the existing description of the site in the Metro Plan text may be an impediment to timely and successful redesignation, re-use and redevelopment of the site in the planning period. To contribute to the redevelopment potential of this site, the City and Lane County[82] adopted an amendment to the Metro Plan text (in Ordinance Exhibit D) to remove the reference to the "Natron Site (south of Springfield)" Special Heavy Industrial site on page II-G-8 of the Metro Plan. Exhibit D amends Chapter II, Section G. Metro Plan Land Use Special Heavy Industrial designation page II-G- 8 as follows:

Two areas are designated Special Heavy Industrial. Listed below are the ~~names of the two areas and~~ applicable land division standards, use limitations, and annexation and servicing provisions.

> ~~Natron Site (south of Springfield)~~
>
> ~~Wastewater service is not available to this area in the short-term; therefore, industrial firms may be allowed to provide self-contained sewage disposal facilities subject to local, state, and federal environmental standards. Annexation to the city shall be required as a condition of development approval. Land divisions in this area shall be a~~

[81] CIBL/EOA redevelopment analysis, Chapter 2, pp. 9-39.
[82] The City of Eugene was notified of this text amendment and opted to not participate in the adoption proceedings.

~~minimum of 40 acres until annexation to Springfield has been assured. While industrial park development will be encouraged on this site, opportunity for the siting of industries that require large lots, such as 20 acres or more, will be reserved through the conceptual development planning and site review process.~~

The City incorporated the Exhibit D text amendment into its 2030 Plan amendment to remove an unnecessary regulatory impediment to redevelopment. The City is not redesignating or rezoning the SHI property at this time and SHI uses and "any industry which meets the applicable siting criteria may make use of this designation"[83] continue to be permitted. Previous visioning for the entire Jasper-Natron area with input from citizens and property owners indicated that the SHI designation is no longer appropriate for this site and that a more flexible Light Industrial or General Employment Designation would encourage re-use or redevelopment of this property in the planning period. The Exhibit D text amendment facilitates redesignation and rezoning of this site in the future. The City and Lane County also adopted a general policy and implementation strategies providing direction for future plan or zoning amendments that could be implemented to address this site and others like it:

2030 Plan Economic Element Policy E.45 states:

> ***"Consider amendments to regulations that will increase predictability and flexibility for industrial site redevelopment and expansion."***

2030 Plan Economic Element Policy Implementation Strategy 45.1 states:

> ***"Consider establishing a new general "Industrial" plan designation to support several different kinds of industrial development."***

2030 Plan Economic Element Policy Implementation Strategy 45.2 states:

> ***"Consider establishing a new "Employment" plan designation and zone that allows a broader array of general industrial uses and develop updated buffering standards."***

2030 Urbanization Element Implementation Strategy 1.3 states:

> ***"Encourage and support redesignation, rezoning, environmental clean-up and redevelopment of brownfields and older industrial sites to allow these lands to redevelop with clean industries and new uses, especially when located in the Willamette Greenway, adjacent to waterways and high value wetlands, and in Drinking Water Protection Zones 1-2 Year TOTZ areas. Provide information to businesses to encourage and facilitate environmental remediation, relocation, and/or redevelopment of these sites."***

2030 Urbanization Element Implementation Strategy 2.1 states:

[83] Metro Plan p. II-G-8

"Preserve large (20 acres or greater) Heavy Industrial, Light Industrial, Campus Industrial and Employment Mixed Use sites for industrial and other employment uses that require large sites, while allowing redesignations that allow limited supporting retail uses (e.g. food and beverage) within the building to support the primary employment use."

2030 Urbanization Element Policy E.3 states:

"Work with property owners and their representatives to ensure that prime development and redevelopment sites throughout Springfield and its Urban Growth Boundary that are designated for employment use are preserved for future employment needs and are not subdivided or used for non-employment uses."

As explained in Table 2-12, the City assumes that six potentially redevelopable sites 5-20 acres offer redevelopment opportunities in the 2010-2030 planning period as follows:

- 12-acre site in the Jasper-Natron Special Heavy Industrial District
- 10-acre site on 28th Street in Heavy Industrial
- 8-acre site on 42nd Street in Heavy Industrial
- 7-acre site at 28th and Marcola Road in Heavy Industrial
- 6.5-acre site on 28th Street in Heavy Industrial
- 6-acre site on Highbanks Road in Heavy Industrial

The City assumed the seven potentially redevelopable sites will be available in the planning period, thus the City reduced the number of needed industrial sites 20 acres and larger by one industrial site[84], and reduced the number of needed sites 5-20 acres by six sites. Application of this assumption reduced the amount of land needed in the UGB expansion. [85]

The CIBL/EOA assumes all of Springfield's needs for industrial and commercial sites less than 5 acres in size will be met within the existing UGB. Application of this assumption reduced the amount of land needed in the UGB expansion by 2 sites and 6 acres.[86]

<u>2030 Policy commitments to redevelopment and designation of additional land for mixed-use development to meet site needs.</u> As previously stated, the CIBL/EOA[87] assumes that all of Springfield's needs for industrial and commercial sites less than 5 acres in size will be met within the existing UGB. As shown in CIBL/EOA Appendix C, Table C-10, "Minimum acreage needs, 20,000 and 50,000 sq. ft. building" , some of Springfield's target employers that locate on "urban office" or "campus style office" sites can locate on vacant or developed, or redevelopable sites smaller than 5 acres. These office uses

[84] This reduction applied to the number of needed sites and acres can be seen by comparing the figures in CIBL/EOA Tables 5-1 and 5-3, pp. 78-79.
[85] See CIBL/EOA Table 5-1, p. 78.
[86] See CIBL/EOA Tables 5-3 and 5-4 showing the reduction of needed sites <5 acres from 2 to 0, and the number of needed acres from 230 to 223, pp. 79 and 80
[87] CIBL/EOA p. 79

include Back Office, Headquarters, and Professional/Technical Services that require 50,000 square feet or less. Urban office space could be part of mixed-use developments.

The City's previously adopted UGB and Residential Land Use and Housing Element committed the City to meeting all residential land use needs for the 2010-2030 planning period without expanding the UGB. The CIBL/EOA assumes 22% of needed employment will occur on "potentially redevelopable" sites.[88] These facts point to the need for ample Springfield policy support for redevelopment — including land designated and zoned to accommodate mixed use development —on sites within the existing UGB. To that end, the City and Lane County adopted a UGB and policy commitments that support and rely upon more mixed-use development in Springfield to meet multiple land use needs within its limited and constrained land supply.

<u>2030 Economic Element policies and implementation strategies</u>

The 2030 Economic Element describes Springfield's focused public policy strategy to accommodate employment growth needs on smaller sites by enabling a high level of redevelopment activity.

2030 Economic Element Policy E.1 states:

> ***"Designate an adequate supply of land that is planned and zoned to provide sites of varying locations, configurations, size and characteristics as identified and described in the Economic Opportunity Analysis to accommodate industrial and other employment over the planning period. These sites may include vacant undeveloped land; partially developed sites with potential for additional development through infill development; and sites with redevelopment potential."***

2030 Economic Element Implementation Strategy 1.2 states:

> ***"Continue to conduct focused neighborhood, district, and corridor refinement planning processes that engage the community to identify sites with potential for infill and redevelopment; and work collaboratively to update planning and zoning to support job creation and more efficient land use."***

The City and Lane County adopted a set of Economic Element policies and strategies committing the City to refinement, corridor and district planning updates that will designate and zone more land to add to Springfield's existing inventory of land designated and zoned Mixed-Use — creating additional opportunities for mixed-use development in Springfield (E.8, E. 9, E.10, E.19, E.22 and Implementation Strategies 4.1, 4.3, 4.4, 4.5, 4.6, 8.2, 8.3, 9.1, 9.2, 9.3, 9.4, 9.5, 9.6, 10.1, 10.2, 10.3, 10.4, 10.5, 10.6, 16.1, 16.2, 16.3, 22.1, 22.4, 24.3, 40.6, 40.7, 40.8.

2030 Economic Element Policy E.6 states:

[88] CIBL/EOA page vi, Figure S-1

"Facilitate short term and long term redevelopment activity and increased efficiency of land use through the urban renewal program, updates to refinement plans and the development review process."

2030 Economic Element Policy E.7 states:

"Where possible, concentrate development on sites with existing infrastructure or on sites where infrastructure can be provided relatively easily and at a comparatively low cost."

2030 Economic Element Implementation Strategy 4.3 states:

"Establish an "Employment Mixed-Use" plan designation to allow secondary supporting land uses in walkable employment centers served by multiple modes of transportation to support the goals of compact urban development."

2030 Economic Element Implementation Strategy 4.4 states:

"Prepare or update refinement, corridor and district plans to create more opportunities for mixed land uses. Prioritize planning for mixed-used development that includes retail, office commercial, and multifamily housing in downtown, Glenwood, along the Main Street corridor and along the Downtown to Gateway transit corridor."

2030 Economic Element Implementation Strategy 4.5 states:

"Continue to support policies and develop implementation tools to encourage economically feasible mixed-use development and nodal development in Springfield's downtown, Glenwood, and in mixed-use nodes in locations identified through the refinement planning process."

2030 Economic Element Implementation Strategy 4.6 states:

"Encourage co-location of residential and commercial uses in existing buildings by developing resources to make available financial assistance for necessary building upgrades to meet requirements in the building code, such as improvements to meet seismic standards."

2030 Economic Element Implementation Strategy 24.3 states:

"Support property-owner initiated proposals to redesignate and rezone commercial land located outside of any neighborhood refinement plan areas adopted after June 2011 to Residential Mixed-Use when consistent with Springfield 2030 Plan policies."

2030 Economic Element Policy 8 states:

"Continue implementing the Downtown District Plan and Implementation Strategy adopted in 2010 to guide revitalization and redevelopment in downtown as resources are available."[89]

2030 Economic Element Implementation Strategy 8.2 states:

"Amend the Downtown Refinement Plan and Downtown Mixed Use Zone to create new capacity and support for downtown employment uses that use land more efficiently and minimizes the costs of providing infrastructure."

2030 Economic Element Implementation Strategy 8.8 states:

"Continue to leverage and expand Downtown Springfield as the City's civic and government center by promoting, investing and seeking opportunities to locate new federal, state and local civic buildings in Downtown or, — if Downtown sites are not readily available — in locations with excellent transit connections to or through Downtown."

2030 Economic Element Policy 9 states:

"Encourage and facilitate redevelopment of Glenwood as a mixed use housing, employment and commercial center."

2030 Economic Element Implementation Strategy 9.1 states:

"Continue to support redevelopment of sites in Glenwood through planning, key investments, innovative development standards, and focused activity through the Springfield Economic Development Agency (SEDA), the Glenwood Urban Renewal Plan, the Glenwood Refinement Plan and the Glenwood Riverfront Plan Mixed-Use Plan District."[90]

2030 Economic Element Implementation Strategy 9.2 states:

"Provide the public infrastructure and services necessary for development in Glenwood, as funds allow."

2030 Economic Element Implementation Strategy 9.3 states:

"Coordinate economic development in Glenwood with regional and State economic development efforts."

2030 Economic Element Implementation Strategy 9.4 states:

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[89] Springfield City Council Resolution 10-57
[90] SDC 3.4-200

"Assist economic development in Glenwood through techniques such as optioning land, land assembly, and cooperative development agreements to assist developers with land assembly issues."

2030 Economic Element Implementation Strategy 9.5 states:

"Recruit anchor institutions, such as academic and health care institutions to locate in Springfield. Recruit to establish a University of Oregon anchor land use in Glenwood to stimulate private investment in redevelopment of vacant or neglected sites."

2030 Economic Element Implementation Strategy 9.6 states:

"Implement the Glenwood Riverfront District/Franklin Corridor District Plan and Phase One plan amendments adopted in 2012."[91]

2030 Economic Element Policy E.10 states:

"Continue to provide public policy and financial support when possible for redevelopment in Springfield. Through the annual Goal-setting process, the City Council shall identify redevelopment target areas."

2030 Economic Element Implementation Strategy 10.1 states:

"Continue to conduct focused refinement planning in key redevelopment areas, as directed by the City Council, and as resources are available."

2030 Economic Element Implementation Strategy 10.3 states:

"When preparing or amending refinement plans, work with neighborhood groups to identify needs and opportunities for creating neighborhood mixed use centers near schools and parks to encourage development of neighborhood-serving "corner store" scale retail, small office or live-work units in or adjacent to residential areas. Consider establishing a Neighborhood Commercial Mixed Use designation."

2030 Economic Element Implementation Strategy 10.4 states:

"Designate a Neighborhood Mixed Use center in Jasper Natron within one half mile of the future school/park sites."

2030 Economic Element Implementation Strategy 10.5 states:

"Encourage opportunities for employment close to residences, including mixed-use development."

2030 Economic Element Implementation Strategy 10.6 states:

[91] SDC 3.4-200 was adopted into the Code in 2013

"Establish Employment Mixed-Use plan designations that could be applied to land along the existing and proposed future high capacity transit corridors and in Nodal Development areas."

2030 Economic Element Implementation Strategy 22.1 states:

"Expand the Downtown Refinement Plan boundary and Downtown Mixed Use District to support additional commercial activity and to create a more viable retail commercial center as envisioned in the 2010 Downtown District Urban Design Plan and Implementation Strategy; and engage the Downtown Citizen Advisory Committee, Historic Commission and property owners to ensure that the form, scale and intensity of new development contributes positively to the adjacent Washburne Historic District neighborhood. Consider that 100,000-125,000 square feet of retail is required for a viable retail destination district; 50,000-60,000 square feet is needed for an anchor use, such as a grocery store or theater multiplex; and contemporary retail businesses need wider and less deep space than currently provided by buildings on Main Street."

2030 Economic Element Implementation Strategy 24.4 states:

"Work with property owners and stakeholders through the Main Street Corridor planning process to consider allowing Medium or High Density residential uses in existing commercial zones in addition to commercial uses."

2030 Economic Element Implementation Strategy 25.2 states:

"Study the feasibility of applying an Employment Mixed-Use or "employment transition" zoning concept to land along the south side of South A Street to support mixed-use redevelopment activity adjacent to the downtown Booth-Kelly center and Mill Race restoration areas when development is compatible with the existing and future use of the rail corridor."

The City and Lane County adopted policies and strategies committing the City to plan and support redevelopment in Downtown (Policy E.20 and Implementation Strategies 22.1, 22.3) Glenwood (Policy E.21), Main Street Corridor (I.S. 22.9, 24.4), Jasper-Natron (Implementation Strategy 22.6), Mohawk Center (I.S. 22.7)(Policies E.20, E.21, E.22).

The City and Lane County adopted policies and strategies committing the City to provide more zoning flexibility for developing industrial or business parks to support clustering of related or complementary businesses.

Economic Element Policy E.4 states:

"Expand industrial site opportunities through evaluating and rezoning commercial, residential, and industrial land for the best economic return for the community

through the process of Periodic Review of the Metro Plan, refinement plans, master plans, expanding the urban growth boundary, and other means."

2030 Urbanization Element Policy 2 states:

"Continue to support and facilitate redevelopment and efficient urbanization through City-initiated area-specific refinement planning and zoning amendments consistent with the policies of this Plan. Plans shall designate an adequate and competitive supply of land to facilitate short-term and long-term redevelopment activity. Efficiency measures achieved through plan amendments may be reflected in land supply calculations to the extent that they are likely to increase capacity of land suitable and available to meet identified needs during the relevant planning period."

2030 Urbanization Element Policy 3 states:

"Balance the goals of accommodating growth and increasing average density within the city with goals to stabilize and preserve the established character of sound older neighborhoods. The City shall adopt detailed area-specific refinement plans to clearly define locations where significant growth and redevelopment is expected, and to establish policies and zoning to guide the design of higher density development."

- ***"Continue to provide public policy and financial support when possible for redevelopment in Springfield."***

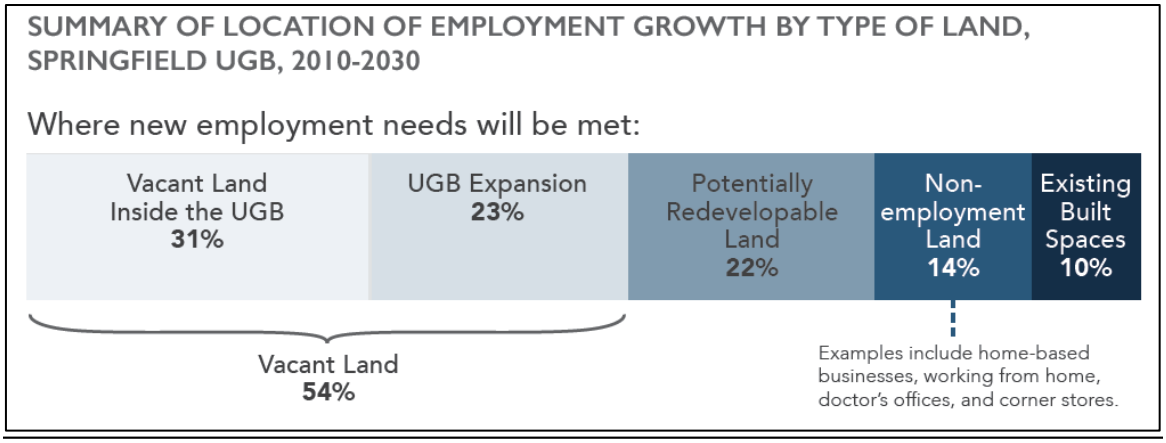
- ***"Continue to prioritize and incentivize redevelopment in the Glenwood and Downtown urban renewal districts and support redevelopment throughout the City as described in the Economic and Residential Elements of this Plan."***

- ***"Continue to provide development tools and incentives (such as Urban Renewal support) within targeted priority redevelopment areas as resources become available to facilitate expedient and economically feasible redevelopment."***

- ***"Continue to conduct focused planning in key redevelopment areas, as directed by the City Council, as resources are available. Such efforts will review, update and supersede existing refinement plan designations and policies."***

- ***"Identify and include public agencies and private stakeholder partners in district-specific planning efforts to facilitate redevelopment through partnerships and other cooperative relationships."***

UGB expansion sites. 23% of employment growth is assumed to occur on land added to the UGB in 2016 to accommodate large employers with special site needs as described in the CIBL/EOA. The City and Lane County designated these lands "Urban Holding Area – Employment."[92]



2030 Economic Element Implementation Strategy 1.1 states:

> ***"Amend the UGB, Metro Plan diagram and text to add 223 acres of suitable land to provide employment sites larger than 20 acres and preserve the suitable sites for future development by creating and applying an "Urban Holding Area - Employment" (UHA – E) designation and zone to the sites as described in the Urbanization Element and Springfield Development Code.***

To add 223 acres of suitable unconstrained land to provide employment sites larger than 20 acres, Ordinance 6361, amends the Springfield UGB to add 273 total acres of land to the UGB (total includes existing right of way). As shown in Exhibit A-2, Suitable land to meet the need for industrial and other employment sites is designated "Urban Holding Area – Employment (UHA-E)."

Ordinance 6361 amends the Metro Plan text and diagram to define and apply the "Urban Holding Area – Employment (UHA-E)" plan designation to the lands shown in Exhibit A-2 and Exhibit D.

2030 Urbanization Element Policy 11 states:

> ***"Plan and zone land within the UHA-E designation to provide suitable employment sites 20 acres and larger to accommodate clean manufacturing uses and office/tech/flex employers in Springfield's target industry sectors. Limited neighborhood-scale retail uses that primarily serve employees within an industrial or office building or complex may be permitted as a secondary element within employment mixed-use zones. Urban Holding Area-Employment (UHA- E) sites shall not be re-designated or zoned to permit development of regional retail commercial uses."***

[92] Ordinance 6361, Exhibit A

2030 Urbanization Element Policy 12 states:

> ***"Master plans are required for contiguous ownerships over 5 acres designated UHA-E and shall address all of the policies of this Plan and the Master Plan requirements of the Springfield Development Code."***

2030 Urbanization Element Policy 22 states:

> ***"Plan and zone the North Gateway UHA-E area to guide development of a well-designed employment district adjacent to the Interstate 5 economic corridor to support diversification and improvement of the local, regional and state economies and to make efficient use of existing and planned public transportation systems and infrastructure. Applicant-initiated plan designation and zoning changes shall address logical extension of transportation and public facilities to serve the entire North Gateway UHA-E district. Development within the North Gateway District shall be zoned and designed to enhance the distinctive physical surroundings and natural resources of the area while accommodating growth and change through implementation of attractive building exteriors and low impact development practices."***

The Springfield UGB as amended provides land for employers requiring sites larger than 20 acres sites 5-20 acres and preserves suitable sites for future development by creating and applying an "Urban Holding Area - Employment Opportunity Area" (UHA – EOA) plan designation and "Agriculture – Urban Holding Area" zoning to the sites as described in the Urbanization Element and Springfield Development Code.

The City and Lane County designated suitable employment sites larger than 5 acres and adopted policies to protect sites larger than 20 acres from land divisions.

Economic Element Policy E.2 states:

> ***"Establish minimum parcel sizes within the "Urban Holding Area - Employment "(UHA – E) designated areas to reserve suitable parcels 20 acres or larger and suitable parcels larger than 50 acres.***

2030 Urbanization Element Policy 7 states:

> ***"For lots/parcels greater than 50 acres in the North Gateway UHA-E District, the minimum lot/parcel size for land division is 50 acres. Land divisions that create lots/parcels for the purpose of establishing a Natural Resource or Public/Semi-Public Parks and Open Space designation within the floodway, wetland or riparian resource portions of the site may create lots/parcels less than 50 acres within the Natural Resource or Public/Semi-Public Parks and Open Space designation portion of the parent lot/parcel. Lots/parcels created and designated for employment purposes shall***

retain the 50-acre minimum until planned and zoned to allow annexation and site development with urban employment uses and densities consistent with the policies of this Plan."

2030 Urbanization Element Policy 8 states:

"For lots/parcels less than 50 acres in the North Gateway and Mill Race UHA-E Districts, the minimum lot/parcel size for land division is 20 acres. Land divisions that create lots/parcels for the purpose of establishing a Natural Resource or Public/Semi- Public Parks and Open Space designation within the floodway, wetland or riparian resource portions of the site may create lots/parcels less than 20 acres within the Natural Resource or Public/Semi-Public Parks and Open Space designation portion of the lot/parcel. Lots/parcels created and designated for employment purposes shall retain the 20-acre minimum until planned and zoned to allow annexation and site development with urban employment uses and densities consistent with the policies of this Plan."

2030 Economic Element Policy 3 states:

"Work with property owners and their representatives to ensure that prime development and redevelopment sites throughout Springfield and its Urban Growth Boundary that are designated for employment use are preserved for future employment needs and are not subdivided or used for non-employment uses."

2030 Economic Element Implementation Strategy 11.1 states:

"Plan, zone and reserve a sufficient supply of industrial and commercial buildable land to create opportunity sites for employment uses identified in the 2015 Economic Opportunities Analysis (EOA), with an initial emphasis on Target Industries listed in the analysis Table S-1, Target Industries, Springfield 2010-2030 (page iii-iv.)"

2030 Economic Element Implementation Strategy 12.4 states:

"Encourage the location and expansion of traded sector industries as a means to increase the average wage and contribute to the growth of the local sector economy."

2030 Economic Element Implementation Strategy 12.5 states:

"Support increased potential for employment in one of the regional industry clusters."

<u>Commitments to</u> <u>provide necessary public facilities and transportation facilities for the newly urbanizable portion of the planning area.</u> The City's 2030 Plan policies are coordinated with existing public facilities and transportation plan policies to provide necessary public facilities and transportation facilities for the Springfield planning area. The 2030 Plan continues to rely upon the acknowledged

Metro Plan policies for coordination of public facilities planning at the Metro area level and transportation system planning at the MPO level to provide public facilities and transportation facilities for the planning area. 2030 Urbanization Element policies 43 and 44 (Ordinance Exhibit C-1) commit the city to update public facilities planning and transportation system planning as may be necessary to provide public facilities and transportation facilities for the newly urbanizable lands added to the UGB planning area prior to approval of a plan amendment or zone change that allows transition from rural to urban uses and densities.

2030 Urbanization Element Policy 9 states:

> ***"As directed by the City Council, the City will conduct comprehensive planning processes and adopt refinement-level plans and implementation measures to guide and regulate urban development in the North Gateway and Mill Race UHA-E districts. The Transportation Planning Rule requirements under OAR 660-012-0060 will be addressed prior to any re-designation or zoning map amendment that allows urbanization."***

2030 Urbanization Element Policy 23 states:

> ***"Amend the Gateway Refinement Plan to include the North Gateway UHA-E area prior to or concurrent with approval of an owner-initiated plan amendment or zone change that allows urban development in the North Gateway UHA-E area. The amended Gateway Refinement Plan shall describe the logical extension of transportation and public facilities to serve the entire North Gateway UHA-E area."***

2030 Urbanization Element Policy 27 states:

> ***"The coordinated, timely provision of urban services is a central element of the City's comprehensive growth management strategy for infill, redevelopment and new development. Development undertaken in pursuit of housing goals, diversifying the economy and neighborhood livability shall occur only after the logical and efficient delivery of all urban services have been provided to these sites."***

2030 Urbanization Element Policy 28 states:

> ***"Regionally significant public investments within Springfield's UGB shall be planned on a metropolitan-wide basis, as described in the regional transportation and public facilities plans."***

2030 Urbanization Element Policy 37 states:

> ***"Prior to re-designating and rezoning land designated Urban Holding Area-Employment, the City shall update and adopt amendments to the Eugene-Springfield***

Metropolitan Public Facilities and Services Plan (PFSP) that may be needed to identify new facilities or major modification of facilities needed to serve development of urban employment uses within the North Gateway or Mill Race districts as necessary to demonstrate accordance with statewide planning Goal 11 and Goal 11 administrative rules requirements and the policies of Metro Plan Chapter III-G Public Facilities Element of the Metro Plan."

2030 Economic Element Policy E.13 states:

"Advocate for and support State, Federal and Metro regional transportation network development policies and initiatives that strengthen Springfield's economic corridor connections and development/redevelopment potential."

2030 Economic Element Implementation Strategy 8.3 states:

"Amend infrastructure plans as necessary to include the infrastructure and services that businesses need to operate in downtown Springfield."

2030 Economic Element Implementation Strategy 8.7 states:

"Collaborate with Springfield Utility Board and other service providers to minimize cost of upgrading and modernizing downtown infrastructure."

2030 Economic Element Implementation Strategy 13.1 states:

"Take advantage of new commercial and residential development opportunities that will be stimulated by the infrastructure projects identified in the Springfield TSP, such as the Franklin Boulevard improvements in Glenwood."

2030 Economic Element Policy E.21 states:

"Plan and support redevelopment of the Glenwood Franklin Riverfront and Downtown districts to be mutually supportive and seek funding to connect the two districts with a pedestrian/bike bridge."

2030 Economic Element Policy E.16 states:

"Consider the economic opportunities provided by transportation corridors and seek to maximize economic uses in corridors that provide the most optimal locations and best exposure for existing and future commercial and industrial uses."

2030 Economic Element Implementation Strategy 16.1 states:

"Develop a Main Street/Oregon Highway 126 corridor plan to update land use designations, zoning, and development standards; evaluate potential nodal

development areas; and coordinate with Lane Transit District's planning for potential transit system improvements."

2030 Economic Element Implementation Strategy 16.2 states:

"Identify future economic corridor or district improvement areas to be targeted with refinement planning (e.g. Downtown to Gateway, Mid-Main to Mohawk, Urban Holding Areas)."

2030 Economic Element Implementation Strategy 16.3 states:

"Plan and zone land to maximize utilization of excellent exposure along Main Street/Highway 126B and Pioneer Parkway as future downtown commercial and employment development sites, as envisioned in the 2010 Downtown District Urban Design Plan."

2030 Economic Element Policy E.17 states:

"Leverage existing rail facilities and future expansion of rail facilities to achieve economic development objectives."

2030 Economic Element Implementation Strategy 17.4 states:

"Work with railroad industrial land specialist staff and Springfield property owners to conduct an inventory of Springfield's existing rail facilities and create a list of industrial sites with existing or previous rail service and/or potential for new service, including opportunities to utilize freight rail line connectivity between Springfield and the Coos Bay port."

2030 Economic Element Implementation Strategy 17.5 states:

"Consider how future expansion of rail freight will affect land use and avoid re-zoning industrial land with rail access to non-industrial uses, while allowing some conversion of existing industrial land to other employment uses, especially in high visibility areas such as the South A corridor east of Downtown, if uses are compatible with heavy rail impacts."

2030 Economic Element Policy E.18 states:

"Coordinate transportation and land use corridor planning to include design elements that support Springfield's economic and community development policies and contribute to community diversity and inclusivity."

2030 Economic Element Implementation Strategy 18.3 states:

"Establish preferred design concepts for key intersections along the corridor that integrate vehicle, pedestrian, bicycle and transit needs."

2030 Economic Element Implementation Strategy 18.7 states:

> ***"Prioritize improvements that would complete local connections to local shopping and service opportunities."***

Springfield's existing acknowledged plan and zoning map designations, public facility plans, and transportation system plans, and Springfield Development Code land use regulations — as amended through adoption and acknowledgement of the 2030 Plan amendments — are adequate to implement policies the City and Lane County adopted pursuant to OAR 660-009-0020.

Conclusion OAR 660-009-0020(1)(c): The City's 2030 Plan Amendments include policy commitments to provide an adequate number of suitable employment sites, types and locations and necessary public facilities and transportation facilities for the planning area.

OAR 660-009-0020(2)

> *"Plans for cities and counties within a Metropolitan Planning Organization or that adopt policies relating to the short-term supply of land, must include detailed strategies for preparing the total land supply for development and for replacing the short-term supply of land as it is developed. These policies must describe dates, events or both, that trigger local review of the short-term supply of land."*

2030 Economic Element Policy E.5 states:

> ***"Provide an adequate, competitive short-term supply of suitable land to respond to economic development opportunities as they arise. "Short-term supply" means suitable land that is ready for construction within one year of an application for a building permit or request for service extension. "Competitive Short-term Supply" means the short-term supply of land provides a range of site sizes and locations to accommodate the market needs of a variety of industrial and other employment uses."***

The CIBL/EOA (pages 40-41) presents an analysis of short-term supply. Most of Springfield's land supply within the existing UGB (91% of vacant commercial and industrial land and 85% of land with redevelopment potential) is considered short-term supply because land can be ready for construction within one year based on "engineering feasibility." The short-term supply meets and exceeds the 25% threshold of OAR 660-009-0025 (3)(a).

Springfield has two urban renewal districts: Glenwood U.D. and Downtown U.D. Both districts have urban renewal plans and financing programs administered by the Springfield Economic Development Agency (SEDA) through the City Manager's Office Economic Development Department. Programs provide support, as funds become available, to plan and prepare the land supply for redevelopment. The urban renewal program, as funds allow, supports provision of a competitive short-term supply of

land in Springfield providing a range of commercial, industrial and mixed-use site sizes and locations to accommodate the market needs of a variety of industrial and other employment uses. [93]

Conclusion OAR 660-009-0020(2): The City and Lane County adopted 2030 Plan Economic Element Policy E.5 to state a commitment to providing a competitive short-term supply of land to accommodate industrial and other employment uses it selected through the economic opportunities analysis. The City and Lane County adopted 2030 Plan Urbanization Element text, policies and strategies describing how Springfield's total supply of urbanizable land, including land in the short-term supply is planned and prepared for development.

OAR 660-009-0020(3)

> *"Plans may include policies to maintain existing categories or levels of industrial and other employment uses including maintaining downtowns or central business districts."*

As described in the CIBL inventory, the City's 2030 Plan Amendments assume Springfield will maintain existing categories or levels of industrial and other employment uses as described in the Metro Plan and associated facilities plans. Any future amendments to existing categories or levels of industrial and other employment uses, policies or implementation strategies are addressed through future plan amendments. Existing categories or levels of industrial and other employment uses are assumed as described in the Metro Plan, associated facilities plans, and the Springfield Development Code.

As described on pages 74-84 of this report, the City's 2030 Plan Amendments include policies and implementation strategies to support Downtown revitalization and redevelopment — maintaining and growing Springfield's Downtown District as an important center of employment and commerce. [94]

Conclusion OAR 660-009-0020(3): The 2030 Plan includes policies to maintain existing categories or levels of industrial and other employment uses including maintaining downtowns or central business districts.

OAR 660-009-0020(4)

> *"Plan policies may emphasize the expansion of and increased productivity from existing industries and firms as a means to facilitate local economic development."*

The City's analysis of trends in the CIBL/EOA assumes the expansion of some existing industries and firms (e.g. Medical cluster) as a means to facilitate local economic development.

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[93] For example, in 2016 SEDA is providing public assistance and financing support for infrastructure upgrades of Franklin Boulevard/McVay Highway and land assembly to assist in preparing Glenwood sites for redevelopment.

[94] In 2016, the City is updating its Downtown Design and Streetscape Development Standards though amendments to the Springfield Development Code and Engineering Design Standards Manual, with assistance from the Oregon TGM Code Assistance Program.

Conclusion OAR 660-009-0020(4): The CIBL/EOA and the City's plan policies designate land and regulate land uses to provide a supply of suitable sites to accommodate expansion and increased productivity from existing industries and firms that are expected to grow in the 2010-2030 planning period.

OAR 660-009-0020(5)

> *"Cities and counties are strongly encouraged to adopt plan policies that include brownfield redevelopment strategies for retaining land in industrial use and for qualifying them as part of the local short-term supply of land."*

The City's 2030 Plan Amendments include policies and implementation strategies to support brownfield redevelopment.

2030 Plan Economic Element Policy E.27 states:

> ***"Support clean up and re-use of brownfields and contaminated sites as the opportunities for reuse arise."***

2030 Plan Economic Element Implementation Strategies 27.1 and 27.2 state:

> ***"Provide public support to identify, assess, clean up and redevelop brownfields as resources become available through grants, SEDA, community partnerships and private investments."***
>
> ***"Seek and leverage funding for brownfield assessment and clean up as one key tool to assist financing for redevelopment."***

The Springfield, Eugene and Lane County partnership has been successful in applying for, receiving and implementing EPA Brownfields Assessment Grants, demonstrating commitment to public support for assessment and clean-up of contaminated lands in the Metro area. As brownfields are assessed and cleaned up, commercial and industrial sites in Springfield's inventory can be redeveloped with appropriate industrial and other employment uses.

> ***"Encourage and support redesignation, rezoning, environmental clean-up and redevelopment of brownfields and older industrial sites to allow these lands to redevelop with clean industries and new uses, especially when located in the Willamette Greenway, adjacent to waterways and high value wetlands, and in Drinking Water Protection Zones 1-2 Year TOTZ areas. Provide information to businesses to encourage and facilitate environmental remediation, relocation, and/or redevelopment of these sites."***

Conclusion OAR 660-009-0020(5): Springfield and Lane County adopted 2030 plan Economic Element Policy policies and brownfield redevelopment strategies.

OAR 660-009-0020(6)

"Cities and counties are strongly encouraged to adopt plan policies pertaining to prime industrial land pursuant to OAR 660-009-0025(8)."

IVd. Employment Land Need - Uses with Special Siting Characteristics

OAR 660-009-0025(8) Uses with Special Siting Characteristics

"Cities and counties that adopt such objectives or policies providing for uses with special site needs must adopt policies and land use regulations providing for those special site needs. Policies and land use regulations for these uses must:

(a) Identify sites suitable for the proposed use;

(b) Protect sites suitable for the proposed use by limiting land divisions and permissible uses and activities that interfere with development of the site for the intended use; and

(c) Where necessary, protect a site for the intended use by including measures that either prevent or appropriately restrict incompatible uses on adjacent and nearby lands."

OAR 660-009-0005(8) defines "Prime Industrial Land" as *"land suited for traded-sector industries as well as other industrial uses providing support to traded-sector industries. Prime industrial lands possess site characteristics that are difficult or impossible to replicate in the planning area or region. Prime industrial lands have necessary access to transportation and freight infrastructure, including, but not limited to, rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes. Traded-sector has the meaning provided in ORS 285B.280."*

As encouraged to do so under OAR 660-009-0020(6), the City and County adopted 2030 Plan Amendments designating land suited for traded-sector industries as well as other industrial uses providing support to traded-sector industries. These industries and uses are identified in the CIBL/EOA. The City and County adopted 2030 Plan Amendments policies pertaining to uses with special site needs characteristics as identified and explained in the adopted CIBL/EOA. OAR 660-009-0025(8) states: *"Special site needs include, but are not limited to large acreage sites, special site configurations, direct access to transportation facilities, prime industrial lands, sensitivity to adjacent land uses, or coastal shoreland sites designated as suited for water-dependent use under Goal 17.*"

The City and County adopted 2030 Plan amendments to the UGB to provide 223 acres of suitable large site employment land. The amended UGB designates suitable large acreage sites — including sites larger than 20 acres — to accommodate target industrial and other employment uses. As previously described in this report under OAR 660-009-0015 (1), (2), (3) and (4) and as described and explained in the CIBL/EOA, needed site characteristics for Springfield target employers include but are not limited to unconstrained, serviceable sites larger than 20 acres with flat topography, access to public services and transportation facilities including public transit and designated truck routes. The City's findings in this

report under Goal 14 describe and explain the City's UGB Alternatives Analysis process to assess the suitability and serviceability of lands it evaluated under ORS 198.298 and Goal 14.

The 2030 Plan amendments designate suitable, large, flat, unconstrained sites in the North Gateway and Mill Race areas to meet special site needs. The City and Lane County identified sites suitable for the proposed employment uses by adopting Ordinance Exhibit A designating these lands "Urban Holding Area-Employment" (UHA-E), and by adopting text amendments to the Metro Plan (Exhibit D) establishing and describing the UHA-E designation.

Exhibit D amends Chapter II, Section G. Metro Plan Land Use Designations to add a new land use designation applicable to Springfield's jurisdictional area of responsibility: Urban Holding Area – Employment. The text amendment inserts the following text on page II-G-9 (after Small-scale Light Industry and before Nodal Development Area):

> **Land Use Designations**
> **Urban Holding Area – Employment** (not shown on *Metro Plan* Diagram)
>
> The Urban Holding Area – Employment (UHA-E) designation identifies urbanizable areas within the Springfield UGB to meet Springfield's long term employment land needs for the 2010-2030 planning period. The UHA-E designation reserves an adequate inventory of employment sites, including sites 20 acres and larger, that are suitable for industrial and commercial mixed use employment uses that generate significant capital investment and job creation within — but not limited to — targeted industry sectors, business clusters and traded-sector industries identified in the most recent Springfield economic opportunities analysis and Springfield Comprehensive Plan Economic Element policies.
>
> Lands designated UHA-E are protected from land division and incompatible interim development to maintain the land's potential for planned urban development until appropriate urban facilities and services are planned or available and annexation to Springfield can occur, as described in the Springfield Comprehensive Plan Urbanization Element. The UHA-E designation remains in effect until the appropriate employment designation is adopted through a City-initiated planning process or an owner-initiated plan amendment process.

The City and Lane County adopted plan policies to reserve the sites it added to the UGB to meet the needs of target industries identified in CIBL/EOA. The policies identify and protect sites suitable for the proposed uses by limiting land divisions and permissible uses and activities that interfere with development of the site for the intended use.

2030 Plan Urbanization Element Policy 4 states:

"Urbanizable lands added to Springfield's acknowledged UGB by Ordinance 6361 (adopted by Springfield City Council December 5, 2016; adopted by Lane County Board of Commissioners December 6, 2016; acknowledged by the Oregon Department of Land Conservation and Development March 5, 2019) to meet employment needs are designated "Urban Holding Area- Employment" (UHA-E) in the Metro Plan consistent with the employment site needs criteria for their inclusion in the UGB.[95] The UHA-E designation reserves employment sites within urbanizable areas of 50 or more suitable acres to support creation of economic districts that will accommodate the site needs of target employment sectors. The size of employment districts and parcels of urbanizable land designated UHA-E shall be of adequate dimension so as to maximize the utility of the land resource and enable the logical and efficient extension of infrastructure to serve the North Gateway or Mill Race urbanizable area."

2030 Plan Urbanization Element Policy 5 states:

"Lands designated UHA-E are planned and zoned for the primary purpose of reserving an adequate inventory of large employment sites that is well located and viable for industry and not easily replicable elsewhere for employment uses that generate:

- ***A significant capital investment;***
- ***Job creation within — but not limited to — targeted industry sectors, business clusters and traded-sector[96] industries identified in the most recent economic opportunities analysis and Economic Element policies of this Plan."***

2030 Plan Urbanization Element Policy 11 states:

"Plan and zone land within the UHA-E designation to provide suitable employment sites 20 acres and larger to accommodate clean manufacturing uses and office/tech/flex employers in Springfield's target industry sectors. Limited neighborhood-scale retail uses that primarily serve employees within an industrial or office building or complex may be permitted as a secondary element within employment mixed-use zones. Urban Holding Area-Employment (UHA- E) sites shall not be re-designated or zoned to permit development of regional retail commercial uses."

2030 Plan Urbanization Element Policy 6 states:

"Lands designated "Urban Holding Area-Employment" are zoned "Agriculture – Urban Holding Area" (AG) on the Springfield Zoning Map and are subject to the development standards of the Springfield Development Code AG Zoning District."

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[95] Employment site needs are explained in the Economic Element of this Plan, and in the Springfield Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis, 2015.
[96] ORS 285A.010(9)

The City is bringing land into the UGB to accommodate the need for large employment sites. The following policies restrict land division to protect those large sites for employers that need large sites.

2030 Plan Urbanization Element Policy 7 states:

> ***"For lots/parcels greater than 50 acres in the North Gateway UHA-E District, the minimum lot/parcel size for land division is 50 acres. Land divisions that create lots/parcels for the purpose of establishing a Natural Resource or Public/Semi-Public Parks and Open Space designation within the floodway, wetland or riparian resource portions of the site may create lots/parcels less than 50 acres within the Natural Resource or Public/Semi-Public Parks and Open Space designation portion of the parent lot/parcel. Lots/parcels created and designated for employment purposes shall retain the 50-acre minimum until planned and zoned to allow annexation and site development with urban employment uses and densities consistent with the policies of this Plan."***

The following policy requires retention of large parcels. The area's existing Lane County zoning is EFU-25 (25-acre minimum).

2030 Plan Urbanization Element Policy 8 states:

> ***"For lots/parcels less than 50 acres in the North Gateway and Mill Race UHA-E Districts, the minimum lot/parcel size for land division is 20 acres. Land divisions that create lots/parcels for the purpose of establishing a Natural Resource or Public/Semi- Public Parks and Open Space designation within the floodway, wetland or riparian resource portions of the site may create lots/parcels less than 20 acres within the Natural Resource or Public/Semi-Public Parks and Open Space designation portion of the lot/parcel. Lots/parcels created and designated for employment purposes shall retain the 20-acre minimum until planned and zoned to allow annexation and site development with urban employment uses and densities consistent with the policies of this Plan."***

The City's 2030 Plan amendments apply the "Agriculture-Urban Holding Area" (AG) zone to the lands it designated "Urban Holding Area- Employment" (UHA-E). The UHA-E sites were included in the UGB to provide suitable, large, flat, unconstrained sites to meet special site needs. Urbanization Element policies are implemented through the land use regulations of the AG zone — protecting sites suitable for the proposed employment uses by limiting land divisions and permissible uses and activities that would interfere with development of the site for the intended use. The City and Lane County adopted Ordinance Exhibit E amending the Springfield Development Code to establish the AG zone and Exhibit A amending the Springfield zoning map to apply the zone.

The City and Lane County adopted Ordinance Exhibit C-1 and by adopting adopted policies and land use regulations for these uses. The City and Lane County previously designated and zoned land within the

existing UGB to provide for uses with special site needs and adopted policies and land use regulations that identify sites suitable for special uses —such as the Campus Industrial District. [97]

Conclusion OAR 660-009-0020(6), OAR 660-009-0025(8): As encouraged to do so under OAR 660-009-0020(6), the City and Lane County adopted 2030 Plan Amendments designating land suited for traded-sector industries as well as other industrial uses providing support to traded-sector industries. These industries and uses are identified in the CIBL/EOA. The City and County adopted 2030 Plan Amendments policies pertaining to uses with special site needs characteristics as identified and explained in the adopted CIBL/EOA.

OAR 660-009-0020(7)

> *"Cities and counties are strongly encouraged to adopt plan policies that include additional approaches to implement this division including, but not limited to:*
>
> *(a) Tax incentives and disincentives;*
>
> *(b) Land use controls and ordinances;*
>
> *(c) Preferential tax assessments;*
>
> *(d) Capital improvement programming;*
>
> *(e) Property acquisition techniques;*
>
> *(f) Public/private partnerships; and*
>
> *(g) Intergovernmental agreements."*

The City's CIBL/EOA includes aggressive assumptions about redevelopment and about projected employment in non-employment designations.

The city supports its assumptions about accommodating employment growth and redevelopment through its adoption and implementation of proactive and aggressive redevelopment planning policies and implementation plans, including but not limited to:

- Establishment of TIF financing programs (Downtown and Glenwood Urban Renewal Districts);
- Recent adoption of the Glenwood Refinement Plan Phase One plan and zoning amendments;

[97] Metro Plan p. II-G-7 describes existing industrial and other employment land use designation districts and identifies special site needs for land uses. For example: Heavy Industrial (energy intensive, large scale storage needs, truck and rail transportation needs); Campus Industrial ("50-acre minimum applied to ownerships of 50 or more acres to protect sites from piecemeal development until a site development plan has been approved by the responsible city; firms are enclosed within attractive exteriors and have minimal environmental impacts, such as noise, pollution and vibration, adequate circulation, compatibility with adjacent areas;" Special Heavy Industrial (40-acre minim parcel size); Nodal Development (transit stop within walking distance, design element that support pedestrian environments,, public spaces such as parks, that can be reached without driving"). Springfield's Refinement Plans and SDC Plan Districts identify special site needs for land uses.

- Recent adoption of Downtown District Urban Design Plan and Implementation Strategy;
- Work in progress (2016-2017) to prepare and adopt Downtown Design Standards amendments to the Springfield Development Code and Engineering Design Standards Manual.
- Initiation of the Main Street Corridor Plan project (with support from the TGM program and EPA); Vision Plan adopted February 2015.
- Conducting assessment work to identify and prioritize Brownfield redevelopment sites (EPA grant);
- Continued political and policy level support for high frequency transit service implementation to support goals for improved multi-modal mobility, equity, air quality, housing choice, connectivity and transit-oriented economic development in Springfield;
- Participation in educational programs that seek to forge a more sustainable future through collaboration between local government, education and agency partnerships (University of Oregon Sustainable Cities Year City 2012-2013);
- Participation in federal programs that support coordinated land use, transportation, housing and environmental planning to build equitable and sustainable regions and communities (HUD Sustainable Communities Grant recipient 2012-2013 Lane Livability Consortium).

Conclusion OAR 660-009-0020(7): The City's 2030 Plan Amendments include policies and implementation strategies to implement economic development, including but not limited to the City's existing urban renewal districts tax increment financing program, the Capital Improvement Program, public/private partnerships, land use controls and ordinances and intergovernmental agreements.

Conclusion OAR 660-009-0020: The City's 2030 Plan Amendments are consistent with the requirements of OAR 660-009-0020.

IVe. Plan Designations and Zoning

OAR 660-009-0025 Designation of Lands for Industrial and Other Employment Uses

> *"Cities and counties must adopt measures adequate to implement policies adopted pursuant to OAR 660-009-0020. Appropriate implementing measures include amendments to plan and zone map designations, land use regulations, public facility plans, and transportation system plans."*

OAR 660-024-0050(6) local government must assign appropriate urban plan designations to the land added to the UGB, consistent with the need determination

> *"When land is added to the UGB, the local government must assign appropriate urban plan designations to the added land, consistent with the need determination. The local*

government must also apply appropriate zoning to the added land consistent with the plan designation or may maintain the land as urbanizable land until the land is rezoned for the planned urban uses, either by retaining the zoning that was assigned prior to inclusion in the boundary or by applying other interim zoning that maintains the land's potential for planned urban development. The requirements of ORS 197.296 regarding planning and zoning also apply when local governments specified in that statute add land to the UGB."

Continued reliance on existing plans and zoning; establishment of new plan designation and interim land use regulations to designate and zone land to accommodate employment uses with special siting characteristics. Existing Metro plan designations establish the land base used to conduct the CIBL/EOA.[98] Springfield and Lane County will continue to rely on existing acknowledged plans and implementation measures (existing Springfield zoning designations, existing land use regulations, the existing Metro Public Facilities and Services Plan, and the existing Springfield Transportation System Plan) to implement the majority of the new 2030 Plan Economic Element and Urbanization Element policies as they are applicable to lands located inside the existing UGB. Land designated for industrial and other employment uses in existing acknowledged plans[99], as provided with services pursuant to existing facilities and transportation plans, and as regulated though existing implementation measures, will provide employment growth sites for commercial and industrial uses that require sites smaller than 5 acres.

2030 Urbanization Element Policy 1 states:

"Urbanizable lands within the 2030 UGB shall be converted to urban uses as shown in the Metro Plan Diagram and as more particularly described in neighborhood refinement plans, other applicable area-specific plans, and the policies of this Plan."

2030 Urbanization Element Policy 2 states:

"Continue to support and facilitate redevelopment and efficient urbanization through City-initiated area-specific refinement planning and zoning amendments consistent with the policies of this Plan. Plans shall designate an adequate and competitive supply of land to facilitate short-term and long-term redevelopment activity. Efficiency measures achieved through plan amendments may be reflected in land supply calculations to the extent that they are likely to increase capacity of land suitable and available to meet identified needs during the relevant planning period."

[98] As shown in CIBL/EOA Map 2-1, (p. 13) "CIBL Plan Designations"; Table 2-1, (p. 7) "Metro plan designations included in the Springfield commercial and industrial buildable lands inventory, 2008"

[99] The recent Central Lane MPO Scenario Planning process provides data and documentation regarding land use and transportation outcomes associated with Metro area build-out under existing land use and facilities plans policies, and through implementation of adopted land use plans, facilities projects and programs. Scarcity of federal, state and local funding impedes construction of needed transportation and facilities projects, thus constraining implementation of existing policies.

With one exception (Exhibit E), existing zoning measures already in place are adequate to implement new 2030 plan policies and to meet Springfield's employment land on sites smaller than 5 acres. The new 2030 plan policies provide additional policy support for economic development in Springfield — such as public planning and financing incentives for redevelopment and mixed-use development to meet Springfield's employment land for sites smaller than 5 acres.

Amending the UGB and designating land to accommodate employment uses with special siting characteristics. As previously explained in the City's findings under OAR 660-009-0020(6) and OAR 660-009-0025(8) on pages 82-86 of this report, to improve local economic opportunities by raising wages in Springfield, the City and Lane County adopted 2030 Plan policies and amended the UGB to add 223 acres of land to accommodate large employers with special siting characteristics. The employment land included in the UGB amendment provides suitable sites for Springfield's target traded sector industries as well as other industrial and employment uses providing support to traded sector industries. Ordinance Exhibit A-1 and A-2 shows the lands added and designated "Urban Holding Area – Employment."

The 2030 Plan amendments, Exhibit B-2 adopted the 2015 CIBL/EOA into the comprehensive plan as a Technical Supplement. CIBL/EOA Map 2-1, p. 13 (lands within the existing UGB) and Exhibit A-2 Metro Plan Designations (lands within the amended UGB) identify the lands designated industrial and other employment uses in the Springfield UGB and comprehensive plan.

By adopting the 2030 Plan amendment ordinance, Springfield and Lane County designated a 20-year (2010-2030) total supply of serviceable land suitable to meet the site needs for industrial and other employment uses for Springfield's planning area, as required by OAR 660-009-0025(2).

By adopting the 2030 Plan amendment ordinance, Springfield and Lane County adopted new 2030 Plan Economic Element and Urbanization Element policies:

- Springfield 2030 Comprehensive Plan Economic Element Exhibit B
    - Exhibit B-1 Economic Element
    - Exhibit B-2 Technical Supplement: CIBL/EOA, 2015
- Springfield 2030 Comprehensive Plan Urbanization Element Exhibit C
    - Exhibit C-1 Urbanization Element including UGB Map
    - Exhibit C-2 UGB Technical Supplement

By adopting the 2030 Plan amendment ordinance, Springfield and Lane County adopted new measures to implement the policies adopted pursuant to OAR 660-009-0020 addressing the need for land with special siting characteristics[100] as described in OAR 660-009-0025(8) including suitable employment sites larger than 5 acres:

[100] CIBL/EOA pp. 82-98 identifies target large-scale manufacturers and large office employers that require sites with special characteristics including: site size 20 acres and larger, topography less 5 % / 7%,

- Exhibit A-1: Springfield UGB amendment
- Exhibit A-2: Metro Plan designations establishing the "Urban Holding Area – Employment" designation to implement Urbanization Element policies
- Exhibit A-3: Springfield zoning map amendments
- Exhibit D: Metro Plan text amendments
- Exhibit E: Springfield Development Code amendment establishing the "Agriculture – Urban Holding Area" zoning district to protect large urbanizable sites added to the UGB from land division and incompatible interim uses

2030 Urbanization Element Policy 4 states:

> ***"Urbanizable lands added to Springfield's acknowledged UGB by Ordinance 6361 (adopted by Springfield City Council December 5, 2016; adopted by Lane County Board of Commissioners December 6, 2016; acknowledged by the Oregon Department of Land Conservation and Development March 5, 2019) to meet employment needs are designated "Urban Holding Area- Employment" (UHA-E) in the Metro Plan consistent with the employment site needs criteria for their inclusion in the UGB. The UHA-E designation reserves employment sites within urbanizable areas of 50 or more suitable acres to support creation of economic districts that will accommodate the site needs of target employment sectors. The size of employment districts and parcels of urbanizable land designated UHA-E shall be of adequate dimension so as to maximize the utility of the land resource and enable the logical and efficient extension of infrastructure to serve the North Gateway or Mill Race urbanizable area."***

2030 Urbanization Element Policy 5 states:

> ***"Lands designated UHA-E are planned and zoned for the primary purpose of reserving an adequate inventory of large employment sites that is well located and viable for industry and not easily replicable elsewhere for employment uses that generate:***
> - ***A significant capital investment;***
> - ***Job creation within — but not limited to — targeted industry sectors, business clusters and traded-sector industries identified in the most recent economic opportunities analysis and Economic Element policies of this Plan."***

2030 Urbanization Element Policy 6 states:

> ***"Lands designated "Urban Holding Area-Employment" are zoned "Agriculture – Urban Holding Area" (AG) on the Springfield Zoning Map and are subject to the development standards of the Springfield Development Code AG Zoning District."***

2030 Urbanization Element Policy 7 states:

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transportation access as close to I-5 as possible via unimpeded freight route, access to public facilities and services, and sites with two or fewer owners.

"For lots/parcels greater than 50 acres in the North Gateway UHA-E District, the minimum lot/parcel size for land division is 50 acres. Land divisions that create lots/parcels for the purpose of establishing a Natural Resource or Public/Semi-Public Parks and Open Space designation within the floodway, wetland or riparian resource portions of the site may create lots/parcels less than 50 acres within the Natural Resource or Public/Semi-Public Parks and Open Space designation portion of the parent lot/parcel. Lots/parcels created and designated for employment purposes shall retain the 50-acre minimum until planned and zoned to allow annexation and site development with urban employment uses and densities consistent with the policies of this Plan."

2030 Urbanization Element Policy 8 states:

"For lots/parcels less than 50 acres in the North Gateway and Mill Race UHA-E Districts, the minimum lot/parcel size for land division is 20 acres. Land divisions that create lots/parcels for the purpose of establishing a Natural Resource or Public/Semi- Public Parks and Open Space designation within the floodway, wetland or riparian resource portions of the site may create lots/parcels less than 20 acres within the Natural Resource or Public/Semi-Public Parks and Open Space designation portion of the lot/parcel. Lots/parcels created and designated for employment purposes shall retain the 20-acre minimum until planned and zoned to allow annexation and site development with urban employment uses and densities consistent with the policies of this Plan."

The UGB amendment as adopted in Exhibit A-1 and new "Urban Holding Area – Employment" plan designation as adopted in Exhibit A-2 and described in Exhibit D are adequate to implement new 2030 Plan policies designating and reserving suitable sites for target industry employers that require large sites, including sites larger than 20 acres. The sites designated "Urban Holding Area – Employment" support creation of planned economic districts to accommodate the site needs of target employment sectors. The size of employment districts and parcels of urbanizable land designated UHA-E is of adequate dimension to maximize the utility of the land resource and to enable the logical and efficient extension of infrastructure (as described in the City's public facilities analysis findings under Goal 14).

The sites designated "Urban Holding Area – Employment" comprise suitable large parcels of land free of absolute development constraints and possessing site attributes and characteristics to match the site operational needs of target industries of identified in the CIBL/EOA Chapter 4 and Appendix C.

The suitable employment sites designated "Urban Holding Area – Employment" included in the amended UGB are designated to implement the Urbanization Element policies adopted pursuant to OAR 660-009-0020 to address the need for sites larger than 5 acres, including sites larger than 20 acres. 2030 Urbanization Element Policy 7 and Policy 8 prevent land divisions below 50 acres for 50-acre sites and below 20 acres for sites less than 50 acres.

The new AG zone adopted in Exhibit A-3 and Exhibit E is adequate to implement these Economic and Urbanization Element policies adopted pursuant to OAR 660-009-0020 to address the need for sites larger than 5 acres and sites larger than 20 acres because the zoning ordinance prevents land divisions below 20 acres and allows only interim uses that do not preclude use of the site by large employers.

The City and Lane County adopted policies requiring facilities planning and transportation planning applicable to the lands designated "Urban Holding Area – Employment" prior to any re-designation or zoning map amendment that allows urbanization.

2030 Urbanization Element Policy 9 states:

> ***"As directed by the City Council, the City will conduct comprehensive planning processes and adopt refinement-level plans and implementation measures to guide and regulate urban development in the North Gateway and Mill Race UHA-E districts. The Transportation Planning Rule requirements under OAR 660-012-0060 will be addressed prior to any re-designation or zoning map amendment that allows urbanization."***

2030 Urbanization Element Policy 37 states:

> ***"Prior to re-designating and rezoning land designated Urban Holding Area-Employment, the City shall update and adopt amendments to the Eugene-Springfield Metropolitan Public Facilities and Services Plan (PFSP) that may be needed to identify new facilities or major modification of facilities needed to serve development of urban employment uses within the North Gateway or Mill Race districts as necessary to demonstrate accordance with statewide planning Goal 11 and Goal 11 administrative rules requirements and the policies of Metro Plan Chapter III-G Public Facilities Element of the Metro Plan."***

2030 Urbanization Element Policy 38 states:

> ***"To ensure that changes to the Springfield Comprehensive Plan are supported by adequate planned transportation facilities, the City shall update and adopt amendments to the Springfield Transportation System Plan (TSP) to identify facilities that may be needed to provide and encourage a safe, convenient and economic multi-modal transportation system to support development of urban uses and densities in the North Gateway and Mill Race areas. The TSP update shall be coordinated with City-initiated comprehensive land use planning or owner-initiated plan amendments and shall be prepared and adopted prior to or concurrently with any plan or zoning amendment that allows an increase in trips over the levels permitted in the AG zone."***

Conclusions OAR 660-009-0025: The City and Lane County adopted measures that are adequate to augment existing Metro Plan plan designations to implement the new 2030 Plan policies adopted under OAR 660-009-0020. The 2030 Plan amendments establish Springfield's 20-year total land supply for industrial and other employment uses. The City and Lane County adopted policies requiring a PAPA process to update public facilities and transportation system plans as necessary prior to land use approval that allows urban uses and urban levels of use on newly urbanizable lands included in the UGB amendment.

IVf. Identification of Needed Sites

OAR 660-009-0025(1) Identification of Needed Sites

> *"The plan must identify the approximate number, acreage and site characteristics of sites needed to accommodate industrial and other employment uses to implement plan policies. Plans do not need to provide a different type of site for each industrial or other employment use. Compatible uses with similar site characteristics may be combined into broad site categories. Several broad site categories will provide for industrial and other employment uses likely to occur in most planning areas. Cities and counties may also designate mixed-use zones to meet multiple needs in a given location."*

Demand for sites. The CIBL/EOA identifies the approximate number, acreage and characteristics of sites needed to accommodate industrial, office and retail uses to meet Springfield's long term land and site needs. Table 4-5 (p. 73) shows site needs by site size and building type for the Springfield UGB from 2010 to 2030. Appendix A, p. 127 provides data and rationale to explain how ECO converted employment to building types using NAICS sectors and how the analysis used data on covered employment and business clusters to inform the projection of needed building and site types. Maps A-1 and A-2 (p. 125-126) show how ECO analyzed employment by size and employer type and how employers are distributed across plan designations and throughout Springfield. ECO grouped industries based on building and site characteristics, as explained on the top of page 127. Table A-9 (p. 128) shows how employment is distributed within plan designations, based on Oregon QCEW and GIS data. Table A-11 (p. 129) shows percent of employees by building type and site sizes. Table A-12 (p. 132) categorizes industries with high and low growth projection for Lane County and concentration of these industries in Springfield.

Table 4-5. Estimated needed sites by site size and building type, Springfield, 2010 to 2030

	Site Size (acres)					
	Less than 1	1 to 2	2 to 5	5 to 20	20 and Larger	Total
Warehousing & Distribution	2	2	3	4	1	12
General Industrial	5	5	4	8	2	24
Office	75	12	13	4	1	105
Retail	55	10	6	2		73
Other Services	44	9	4	2		59
Total	181	38	30	20	4	273

Source: ECONorthwest

Land demand and needed sites in Springfield are described and quantified in Chapter 4. Appendix C presents the process ECONorthwest used to convert between employment forecast to site needs. Table 4-5 (p. 73) presents the estimate of needed sites by site size and building type, showing that Springfield needs to provide 273 sites to accommodate employment growth in targeted building type categories between 2010 and 2030. The majority of sites (219 sites) will be two acres or smaller. Springfield needs approximately 24 sites larger than 5-acres, including 4 sites larger than 20-acres.

The identified site needs shown in Table 4-5 do not distinguish sites by comprehensive plan designation. It is reasonable to assume that industrial uses will primarily locate in industrial or campus industrial zones. Retail and service uses could locate in commercial zones, mixed use zones, and residential mixed-use zones.

Table 4-2, page 69 shows existing Metro plan designations where Springfield's target industry types are permitted within the designated land supply — if sites possessing the industry's needed site size and site characteristics were available.[101]

[101] See pages 42-43 of this report OAR 660-009-0015(2) Identification of Required Site Types.

Table 4-2. Target Industries and Plan Designations

Target Industry	Plan Designation										
	Campus Industrial	Commercial	Commercial Mixed Use	Heavy Industrial	High Density Residential Mixed Use	Light Medium Industrial	Light Medium Industrial Mixed Use	Major Retail Center	Medium Density Residential Mixed Use	Mixed Use	Special Heavy Industrial
Medical Services		✔	✔		✔		✔		✔	✔	
Services for Seniors		✔	✔		✔			✔	✔	✔	
Manufacturing	✔			✔		✔	✔			✔	✔
Specialty Food Processing	✔			✔		✔	✔			✔	✔
High-Tech	✔					✔	✔			✔	✔
Professional and Technical Services	✔	✔	✔		✔		✔	✔	✔	✔	
Call Centers	✔		✔				✔			✔	
Back Office Functions	✔		✔			✔	✔			✔	
Tourism		✔	✔				✔	✔		✔	
Green Businesses	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
Corporate Headquarters	✔	✔	✔		✔		✔		✔	✔	
Services for Residents		✔	✔		✔		✔	✔	✔	✔	
Government and Public Services	✔	✔	✔							✔	

The city's findings in this report under OAR 660-009-0015(1) Review of Trends, and the City's findings under OAR 660-009-0015(4) Assessment of Community Economic Development Potential describe and reference Springfield's locational factors in relationship to future industrial and other employment uses.[102] The city's findings in this report under OAR 660-009-0015 (2) Identification of Required Site Types, on pages 45-49 addressed site characteristics typical of expected uses. As permitted under OAR 660-009-0015(2) Industrial or other employment uses with compatible site characteristics were grouped together into common site categories.

Characteristics of needed sites are identified and explained in CIBL/EOA Chapter 5 (pp. 82-98 and Appendix C). Appendix A provides employment location and building/site type NAICS data.

<u>20-year employment land demand compared with land supply.</u> Chapter 5 of the CIBL/EOA Land Capacity and Demand (pp. 77-98) compares the demand for sites with available land in Springfield's inventory. Table 5-1 (p. 78) compares the inventory of vacant and potentially redevelopable sites with Springfield's land need by site size and type (industrial or commercial and mixed use). The City and Lane County adopted the CIBL inventory and policy commitments to support, enable and foster redevelopment, reducing the need to expand the UGB.[103] As explained in the CIBL/EOA Inventory, Table 2-12 (CIBL/EOA p. 33-38), the City assumes that 7 potentially redevelopable sites 5 acres and larger offer redevelopment opportunities in the 2010-2030 planning period. The results of the evaluation of tax lots in Table 2-12 show that one of the seven potentially redevelopable sites is larger than 20 acres and six of the potentially redevelopable sites are 5-20 acres in size.

[102] See pages 31-45 of this report. Potential growth industries are discussed on p. 43 of this report.
[103] As explained on p. 67-88 of this report. The City's evaluation of redevelopable land, including a parcel-level evaluation of sites 5 acres and larger with redevelopment potential is explained in the CIBL/EOA pp. 27-39.

Table 5-2 (p, 78) converts site needs to needed acres by applying average site size in Springfield. Table 5-3 summarizes site needs. Table 5-4 reduces land need by applying an assumption that need for sites smaller than 5 acres will be met within the existing UGB.[104]

Table 5-4. Employment site and land needs, Springfield UGB, 2010-2030

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

Source: ECONorthwest

Total land supply to meet site needs by plan designation. The CIBL/EOA Chapter 2, pp. 5-42 explains the inventory of lands, how lands were classified and how the existing inventory will provide or not provide land designated to meet the site needs. Table 2-4 shows that about 28% of land in Springfield's existing UGB is in the CIBL land base. Map 2-2 (p. 20) shows how lands were classified in the inventory. Table 2-5 (p. 18) shows location of land by plan designation.

Suitable land supply to meet site needs. Table 2-6 (p. 19) shows employment land base acres by plan designation and constraint status, including employment allocated to sites pursuant to City-approved Master Plans. Table 2-6 and Table 2-7 (pp. 19, 21) show how the presence of absolute constraints on acres in tax lots affects the inventory. Table 2-6 shows that a total of 608 acres of land designated for employment in 2008 are unsuitable due to presence of absolute development constraints (floodway, slopes >15%, wetlands, riparian resource areas). It should be noted that Springfield's inventory counted flood plain acres as buildable acres. Only flood way was considered unbuildable. Map 2-4 (p. 25) shows areas with absolute constraints. Map 2-5 (p. 26) shows areas with partial constraints (flood plain, Willamette River Greenway and BPA easements). Table 2-7 (p. 21) shows that 277 acres of potentially redevelopable and vacant sites are unsuitable to meet land needs because those acres have absolute constraints. Table 2-9 (p. 23) shows data to evaluate how vacant land is distributed by parcel size. It is important to note that the results of the Table 2-9 evaluation show that the City has no vacant tax lots 20 acres and larger.

Total land supply to meet site needs includes "potentially redevelopable" land. CIBL/EOA pp. 27-39 presents data and analysis to evaluate opportunities in Springfield to accommodate employment growth on existing sites in the UGB through redevelopment. Only redevelopment that adds capacity for more employment on a site is relevant in the context of the inventory. As stated on p. 27, an operational definition of redevelopment that would apply to the inventory is:

[104] As explained in CIBL/EOA p. 79

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

The rationale and criteria employed by ECONorthwest to classify sites as potentially redevelopable is explained in CIBL/EOA pp. 27-31. The public process used to inform criteria selection and application is fully documented in the record. Table 2-10 shows results of applying the criteria to tax lots in the land base. These results were evaluated and it was determined that the significant amount of land in the "lower potential" category (28% of the City's total employment land base and more than 20% of Springfield's covered employment —7,107 jobs) suggested limited redevelopment potential to replace existing uses with uses with more employment. As explained on in CIBL/EOA page 30:

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

The City explained the criteria used to categorize and rationale used to identify potentially redevelopable land. The City's explanation is reasonable and based on the professional judgment of the City's consultant ECONorthwest, with input from the public, Planning Commission and City Council.

Conclusions OAR 660-009-0025(1) and (2): The 2030 Plan amendments identify the approximate number, acreage and site characteristics of sites needed to accommodate industrial and other employment uses to implement plan policies. The 2030 Plan amendments designate serviceable land suitable to meet the identified site needs, including land to meet the needs of uses with special siting characteristics identified in OAR 660-009-0025(8). The 2030 Plan amendments designate serviceable land consistent with the policy direction found in the CIBL/EOA and Comprehensive Plan. The total acreage of land designated is at least equal to the total projected land needs for each industrial or other employment use category identified in the plan during the 20-year planning period.

After accounting for available land supply and the results of efficiency measures, Table 5-4 of the CIBL/EOA identifies employment needs that require expansion of the UGB as follows:

Commercial and Mixed-Use (**Land Need = 5 sites, 97 acres**). After accounting for vacant, partially-vacant and potentially redevelopable commercial and mixed use land supply within the UGB, there is an unmet need for 5 commercial and mixed-use sites totaling an estimated 97 acres.

Industrial **(Land Need = 2 sites, 126 acres**). After accounting for vacant, partially-vacant and potentially redevelopable industrial land supply within the UGB, unmet industrial need is identified as 2 large sites, totaling an estimated 126 acres.

Total land needed in the UGB expansion of 223 suitable acres: 3 sites larger than 20 acres and 4 sites 5-20 acres.

The sites needed in the UGB expansion to meet special site needs meet the site requirements described on pages 82-95 of the CIBL/EOA Characteristics of Needed Sites.

OAR 660-009-0025 (3) Short-Term Supply of Land

"Plans for cities and counties within a Metropolitan Planning Organization or cities and counties that adopt policies relating to the short-term supply of land must designate suitable land to respond to economic development opportunities as they arise. Cities and counties may maintain the short-term supply of land according to the strategies adopted pursuant to OAR 660-009-0020(2)."

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

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

<u>OAR 660-009-0020 (1)(b) and OAR 660-009-0025 (3) Conclusion:</u> The CIBL/EOA provides an analysis of short-term supply on pages 40-41 to demonstrate that most of Springfield's land supply within the existing UGB (91% of vacant commercial and industrial land and 85% of land with redevelopment potential) is considered short-term supply because land can be ready for construction within one year based on "engineering feasibility." Thus the short-term supply meets and exceeds the 25% threshold of OAR 660-009-0025 (3)(a). The City and Lane County adopted Economic Element Policy E.5 to state commitment to providing a competitive short-term supply of land to accommodate industrial and other employment uses it selected through the economic opportunities analysis.

OAR 660-009-0025(4)

"Subsequent implementation of or amendments to the comprehensive plan or the public facility plan that change the supply of serviceable land are not subject to the requirements of this section."

(a) "Identify serviceable industrial and other employment sites. The affected city or county in consultation with the local service provider, if applicable, must make decisions about whether a site is serviceable. Cities and counties are encouraged to develop specific criteria for deciding whether or not a site is serviceable. Cities and counties are strongly encouraged to also consider whether or not extension of facilities is reasonably likely to occur considering the size and type of uses likely to occur and the cost or distance of facility extension;"

The City's 2030 Plan amendments to the Metro Plan comprehensive plan change the supply of serviceable land and thus are not subject to the requirements of OAR 660-009-0025(4). Though not required to do so, the City conducted a considerable amount of comparative analysis to identify serviceable industrial and other employment sites, with the intent of providing suitable, serviceable lands in the near term to meet its economic development objectives.

As explained in the CIBL/EOA Inventory and discussion of development constraints in Chapter 2 (pp. 8-17), and as documented in the record, the City consulted with local service providers to make decisions about whether a site is serviceable. As fully explained in the City's findings under Goal 14 Public Facilities Analyses, the City consulted with local service providers to make decisions about whether a site is serviceable; developed specific criteria for deciding whether or not a site is serviceable; and considered whether or not extension of facilities is reasonably likely to occur considering the size and type of uses likely to occur and the cost or distance of facility extension.

OAR 660-009-0025(5) Institutional Uses

> *"Cities and counties are not required to designate institutional uses on privately owned land when implementing section (2) of this rule. Cities and counties may designate land in an industrial or other employment land category to compensate for any institutional land demand that is not designated under this section."*

As permitted under OAR 660-009-0025 (5) Cities and counties may designate land in an industrial or other employment land category to compensate for any institutional land demand that is not designated under this section.

OAR 660-009-0025 (6) Compatibility.

> *"Cities and counties are strongly encouraged to manage encroachment and intrusion of uses incompatible with industrial and other employment uses. Strategies for managing encroachment and intrusion of incompatible uses include, but are not limited to, transition areas around uses having negative impacts on surrounding areas, design criteria, district designation, and limiting non-essential uses within districts."*

The Springfield Development Code includes district designations, use limitations and development standards to address land use compatibility. These include requirements for landscaped setbacks between zoning districts, design criteria for Campus Industrial, Nodal Development, Mixed Use Employment and Mixed Use Commercial plan designations and zoning districts.

The 2030 Plan amendments establish the AG land use zoning district (Ordinance Exhibit E) to support transition of land from rural agriculture uses to urban employment uses — including provisions to limit interim development on lands added to the UGB to meet large site employment needs. The AG

development standards manage encroachment in the Urban Holding Area – Employment plan designation by prohibiting intrusion of incompatible uses.[105]

OAR 660-009-0025(7) Availability

> "*Cities and counties may consider land availability when designating the short-term supply of land. Available land is vacant or developed land likely to be on the market for sale or lease at prices consistent with the local real estate market. Methods for determining lack of availability include, but are not limited to…*

The City did not consider land availability when designating the short-term supply of land. CIBL/EOA (page 40-41, Table 2-13) provides an analysis of short-term supply of land. For purposes of Goal 9, the City assumes 91% of the vacant buildable land acres designated for employment uses and 85% of land with redevelopment potential within the existing UGB is available as short-term supply. Buildable land in the Jasper-Natron area is the only area with employment lands that are not considered part of the short term supply.

OAR 660-009-0025(8) Uses with Special Siting Characteristics[106]

> *"Cities and counties that adopt objectives or policies providing for uses with special site needs must adopt policies and land use regulations providing for those special site needs. Special site needs include, but are not limited to large acreage sites, special site configurations, direct access to transportation facilities, prime industrial lands, sensitivity to adjacent land uses, or coastal shoreland sites designated as suited for water-dependent use under Goal 17. Policies and land use regulations for these uses must:*
>
> *(a) Identify sites suitable for the proposed use;*
>
> *(b) Protect sites suitable for the proposed use by limiting land divisions and permissible uses and activities that interfere with development of the site for the intended use; and*
>
> *(c) Where necessary, protect a site for the intended use by including measures that either prevent or appropriately restrict incompatible uses on adjacent and nearby lands.*

OAR 660-024-0050(6) Plan designations and zoning

> *"When land is added to the UGB, the local government must assign appropriate urban plan designations to the added land, consistent with the need determination. The local*

[105] As cited on page 112-113 of this report, Exhibit E, SDC 3.2-915, Table A.

[106] See Exhibit F-1 Supplemental Findings for discussion of existing policies to preserve the industrial land supply and maintain large industrial sites.

government must also apply appropriate zoning to the added land consistent with the plan designation or may maintain the land as urbanizable land until the land is rezoned for the planned urban uses, either by retaining the zoning that was assigned prior to inclusion in the boundary or by applying other interim zoning that maintains the land's potential for planned urban development. The requirements of ORS 197.296 regarding planning and zoning also apply when local governments specified in that statute add land to the UGB."

Special site needs and characteristics. The City's CIBL/EOA identifies a need for suitable employment land to accommodate uses with "special siting characteristics,"[107] thus OAR 660-009-0025(8) is applicable.

The City's CIBL/EOA identifies a need for suitable employment land to accommodate uses with special site needs identified in OAR 660-009-0025(8) including but not limited to:

- large acreage sites
- special site configurations
- direct access to transportation facilities
- prime industrial lands
- sensitivity to adjacent land uses

The Administrative Rule defines site characteristics as follows in OAR 660-009-0005(11):

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

Minimum acreage/Large acreage sites. The City's CIBL inventory of Industrial and Other Employment Lands indicates that Springfield has a deficit of suitable sites that are 20 acres and larger, and deficit of sites 5-20 acres in size. After assuming that all site needs for commercial and industrial uses that require sites smaller than 5 acres would be addressed through redevelopment[108], CIBL/EOA Table 5-4, (p. 80) shows a deficit of 2 industrial sites and 1 commercial and mixed use site 20 acres and larger. Table 5-2 (p. 78) shows the average site size in Springfield for industrial and commercial and mixed use sites 20 acres and larger: 63 acres and 60 acres respectively. Thus Springfield has a need for 126 acres of

[107] CIBL/EOA pp. 82-98 identifies target large-scale manufacturers and large office employers that require sites with special characteristics including : site size 20 acres and larger, topography less 5 % / 7%, transportation access as close to I-5 as possible via unimpeded freight route, access to public facilities and services, and sites with two or fewer owners.

[108] CIBL/EOA Table 5-1, p. 78 shows that 188 industrial sites and 340 commercial and mixed use sites would redevelop to address land needs over the 20-year period. In addition to this assumption, Springfield concludes that all land needs on sites smaller than 5 acres would be accommodated through redevelopment, including the 6-acre deficit of 2-5 acre sites shown in Table 5-3, p. 79.

industrial employment land on 2 sites larger than 20 acres and a need for 97 acres of commercial employment land on 5 sites, including one site that is 60 acres in size.

The CIBL/EOA presents the range of typical site size attributes of Springfield's target employers in the manufacturing category on p. 84-90 and in the large office category on p. 90-95.

Identification of large acreage sites suitable for the proposed use. The City and Lane County amended the Springfield UGB to provide at least 223 suitable acres of employment land to meet the City's employment land needs for suitable sites larger than 5 acres. OAR 660-009-0025(8) requires the City to identify the lands to accommodate the proposed uses. The sites are identified in Ordinance Exhibit A-2 as "North Gateway" site and "Mill Race" site and are described in Ordinance Exhibit C-1 Urbanization Element and Exhibit D Metro Plan text amendment" Urban Holding Area – Employment Plan Designation.

Protection of sites suitable for the proposed use. OAR 660-009-0025(8) requires the City to adopt land use regulations limiting land divisions and permissible uses and activities that interfere with development of the site for the intended use, and "*where necessary, protect a site for the intended use by including measures that either prevent or appropriately restrict incompatible uses on adjacent and nearby lands.*" The City and Lane County adopted Ordinance Exhibit E amending the Springfield Development Code to establish SDC 3.2-900: the "Agriculture – Urban Holding Area (AG)" land use zoning district; and Exhibit A-3 applying the AG zone to the Urban Holding Area - Employment sites.

The AG District implements the Urban Holding Area-Employment (UHA-E) plan designation and Springfield Comprehensive Plan Urbanization Element policies by preserving an inventory of suitable employment sites — including sites 20 acres and larger — to provide opportunities for economic growth and diversification. The AG District is applied concurrently with the UHA-E designation at the time of the subject Springfield Urban Growth Boundary (UGB) amendment and remains in effect until the land is designated and zoned for urban employment uses through a City or owner-initiated plan or zoning amendment process, as described in Subsection 3.2-930 Planning Requirements Applicable to Zoning Map Amendments, and as further described in the Springfield Comprehensive Plan Urbanization Element.

The AG District protects urbanizable lands designated UHA-E in the comprehensive plan from land division and incompatible interim development. The AG regulatory measures guide and support orderly and efficient transition from rural to urban land use to accommodate population and urban employment inside the UGB. AG standards regulate development to maintain the land's potential for planned future urban development until appropriate urban facilities and services are planned or available and annexation to Springfield can occur, as described in the Springfield Comprehensive Plan Urbanization Element. Land designated Urban Holding Area-Employment will be annexed to the city and rezoned from AG to an appropriate industrial or commercial zone at which time urban industrial and other employment uses will supersede the interim rural uses permitted in the AG District.

Special site configuration including shape and topography. The CIBL/EOA presents the typical site configuration and topography attributes of Springfield's target employers in the manufacturing category and in the large office category.

The employment site needs analysis in CIBL/EOA Chapter 4 identified site needs in five types of buildings: warehousing and distribution, general industrial, office, retail, and other services. The characteristics of needed sites for each of these building types are described in CIBL/EOA Chapter 5. All sites will need access to electricity, phone, and high-speed telecommunications.

OAR 660-009-0005(11) defines "minimum acreage or site configuration" as an attribute of a site that may be necessary for a particular industrial or other employment use to operate.

Springfield's analysis identified a need for sites larger than 5 acres and sites larger than 20 acres. Table 5-1 shows that Springfield has a deficit of two Industrial sites 20 acres and larger, which may be needed by target industries such as light manufacturing, high-tech manufacturing, recreation equipment manufacturing, wood products manufacturing, medical products manufacturing, alternative energy manufacturing, or specialty food processing.

Springfield also has a deficit of Commercial and Mixed Use sites, including: four sites 5 to 20 acres in size and one site 20 acres and larger. The target industries that may locate on these sites include: Medical Services, Professional and Technical Services, Back-Office Functions, Call Centers, or Corporate Headquarters.

CIBL/EOA pages 82-98 present the characteristics of needed sites, focusing on the deficit of 223 acres of employment land identified in Table 5-4[109]:

Table 5-4. Employment site and land needs, Springfield UGB, 2010-2030

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

Source: ECONorthwest

OAR 660-009-0005(11) defines "shape and topography" as attributes of a site that may be necessary for a particular industrial or other employment use to operate.

[109] CIBL/EOA, p. 80

OAR 660-009-0005(11) defines "visibility" as an attribute of a site that may be necessary for a particular industrial or other employment use to operate. The City's UGB expansion includes land visible from Interstate Highway 5.

OAR 660-009-0005(11) defines "specific types or levels of public facilities, services or infrastructure" as attributes of a site that may be necessary for a particular industrial or other employment use to operate. The City expanded the UGB to include land that can be served with urban levels of public facilities, services or infrastructure.[110]

OAR 660-009-0005(11) defines "proximity to a particular transportation or freight facility such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes" as attributes of a site that may be necessary for a particular industrial or other employment use to operate. The City expanded the UGB to include land that is located proximate to major transportation routes. The North Gateway site is within 1 mile of Interstate Highway 5. The Mill Race site is within ½ mile of Oregon Highway 126, and accessible to truck routes.

The OAR 660-009-0005(11) definition of "site characteristics" states that the characteristics listed in the definition "include, but are not limited to" the characteristics listed in the definition, thus other characteristics — such as proximity to existing or planned public transit routes may be necessary siting criteria for major employers and may be necessary to achieve local and regional transportation, land use, and equity policy objectives.

The City's identification of needed site characteristics is reasonable, explained by evidence in the CIBL/EOA and evidence in the record, and consistent with the Goal 9 administrative rule.

CIBL/EOA presents information about the sites needed by the target industries based on information by Business Oregon, economic development efforts in Springfield, a study about industry site needs in Springfield by TadZo, and other sources. Appendix C (Tables C-6 to C-11) present details of research about site needs of Springfield's target industries from these sources. CIBL/EOA Table 5-5[111] provides a summary of site characteristics of sites needed by Springfield's target industries:

[110] See City's complete findings under Goal 14 Public Facilities Analysis
[111] ECONorthwest, CIBL/EOA, page 84

Table 5-5. Summary of characteristics of sites needed by target industries, Springfield

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

ECONorthwest, CIBL/EOA Table 5-5

Site needs to accommodate target manufacturing uses requiring sites 5 acres and larger are explained in CIBL/EOA pp. 85-90.

Site needs to accommodate target large office employers uses requiring sites 5 acres and larger are explained in CIBL/EOA pp. 90-95. The City developed site characteristics (site size, topography, transportation access, access to services and land ownership) that are typical of and have a meaningful connection to the operation of the industrial or employment use as required by law. For example, in terms of the site size characteristic, both manufacturing and large office employers require a site large enough to accommodate the built space (and phased development manufacturing uses), the right of way requirements to accommodate the capacity for needed infrastructure, and the space required to meet the meet the applicable land use or natural resource buffers required through the City's development or building code regulations. The data from Business Oregon and the TadZo report also shows that manufacturing and large employer uses are currently located on sites 10 acres or larger.

For topography it was determined that manufacturing uses require and are generally located on flat sites where as large office employers can and are located on sites with low to moderate slope. Manufacturing and large office employers are generally located on arterial or major collector streets instead of smaller local streets to ensure sufficient automotive and transit access. Access to services is required and typical of these types of employers in order to be cost effective and to allow

manufacturing industries access to services such as water and wastewater. The land ownership site characteristic is connected to the operation of manufacturing and large office employers because the extra time and cost of developing an industrial site with multiple landowners can often make a development infeasible. Also, OAR 660-009-0005(2) specifically lists parcel fragmentation as a development constraint.

The City and Lane County adopted policies in the 2030 Comprehensive Plan Urbanization Element and land use regulations in the Springfield Development Code[112] to protect sites 20 acres and larger from land division in order to accommodate uses that require sites 20 acres and larger.

Metro Plan IV-4, Policy 11 states:

> "Local implementing ordinances shall provide a process for zoning lands in conformance with the *Metro Plan*."

The 2030 Plan includes amendments to the Metro Plan Diagram and text, Springfield Zoning Map and Springfield Development Code to establish areas of the City where employment land uses can occur to provide sites of suitable sizes, types and locations within proposed North Gateway and Mill Race UGB expansion areas.

The 2030 Plan relies on existing acknowledged Metro Plan designations and Springfield Development Code zoning districts to identify areas of the City where employment land uses are permitted to provide sites of suitable sizes, types and locations within the existing UGB.

The 2030 Plan Ordinance Exhibit D amends the Metro Plan to establish the Urban Holding Area – Employment (UHA-E) Metro Plan designation, described in the amended Metro Plan text page II-G-8 as follows:

> **Urban Holding Area – Employment**
>
> Lands brought into Springfield's UGB to address 2010-2030 land needs for large employment sites are designated Urban Holding Area – Employment (UHA-E) as an interim designation to maintain the land's potential for planned urban development until appropriate urban facilities and services are planned or available and annexation to Springfield can occur. Lands within the UHA-E designation are zoned Agriculture to retain large parcels sizes and current predominant farm use. The UHA-E designation remains in effect until the appropriate Employment designation is adopted through a City refinement plan process or owner-initiated plan amendment process, and when land is master planned, annexed and zoned to allow site development with employment uses. A 50-acre minimum lot size is applied to ownerships of 50 or more acres and a 20-acre minimum lot size is applied to ownerships of 20 to 50 acres to protect undeveloped sites from piecemeal development until a site development plan has been approved.

[112] See Ordinance 6361, Exhibit E: SDC 3.2-900 Agriculture- Urban Holding Area (AG) Zoning District

The proposal amends the Metro Plan to adopt the 2030 Urbanization Element. 2030 Urbanization Element policies establish special planning requirements applicable to land designated UHA-E, including policies #5-12 to retain large parcels to meet specific employment land needs. A 50-acre minimum lot size for land division is applied to tax lots or ownerships greater than 50 acres. A 20-acre minimum is applied to tax lots or ownerships less than 50 acres.

Adoption of Ordinance Exhibit E amends the Springfield Development Code to establish the Agriculture – Urban Holding Area (AG) Zoning District to implement the UHA-E plan designation and 2030 Urbanization Element policies. AG is a holding zone that restricts divisions and interim land uses that could impede development of the site to meet the specific employment land needs identified in the City's EOA. The primary purpose of SDC Section 3.2-900 AG Zoning District is to protect large tracts of suitable employment land within the Springfield UGB to meet Springfield's long term employment land needs for the 2010-2030 planning period. Springfield applies the AG interim zoning to lands added to the UGB in 2016 to implement 2030 Comprehensive Plan Urbanization Element policies, the Urban Holding Area-Employment (UHA-E) Metro plan designation and the Natural Resource (NR) Metro plan designation. The AG zone allows continuation of agricultural and existing lawful uses while reserving suitable land for siting future employment uses that require large sites. The AG zone development standards serve to maintain the land's potential for planned urban development by regulating land division and interim uses that would impede development of urban employment uses in the future.

The AG zone purpose statement:

> The City's Agriculture—Urban Holding Area District (AG) is established to protect urbanizable lands designated Urban Holding Area-Employment (UHA-E) and Natural Resource (NR) in the comprehensive plan from land division and incompatible interim development. The AG regulatory measures guide and support orderly and efficient transition from rural to urban land use to accommodate population and urban employment inside the UGB. AG standards regulate development to maintain the land's potential for planned future urban development until appropriate urban facilities and services are planned or available and annexation to Springfield can occur, as described in the Springfield Comprehensive Plan Urbanization Element. Land designated Urban Holding Area-Employment will be annexed to the city and rezoned from AG to an appropriate industrial or commercial zone at which time urban industrial and other employment uses will supersede the interim rural uses permitted in the AG District.

The AG District 3.2-915 allows the following uses:

Use Categories/Uses	**AG**
A. Allowed Interim Uses for Lands Designated Urban Holding Area- Employment	
Agricultural uses including the cultivation of tree crops, plants, orchards, pasture, flower, berry and bush crops or the keeping, boarding, raising or breeding of livestock or poultry.	**P**
On-site constructing and maintaining of equipment, structures and facilities used for the activities described as farm uses. **(1),(3),(4)**	**P**
Preparation, storage, and marketing of the products or by-products raised on such land for human and animal use, or distributing food by donation to a local food bank or school or otherwise. **(1)**	**P**

Use Categories/Uses	AG
Sales/Display of Produce as specified in Subsection 4.8-125. **(1),(4)**	**S**
Signs **(5)**	**P**
Accessory Uses	
Community Gardens	**P**
Replacement of a lawfully existing dwelling or structure as specified in Subsection 5.8-115. **(2),(3)**	**P**
Emergency Medical Hardship as specified in Section 5.10-100. **(2)**	**P**
Other Commercial Services	
Home Occupation within a lawfully existing dwelling and as specified in Subsection 4.7-165 **(4)**	**S**
Utilities and Communication	
High Impact Public Utility Facility as specified in Subsection 4.7-160	**S/D**
Low Impact Public Utility Facility	**P**

(1) Where farm stands are designed and used for sale of farm crops and livestock grown on the farm operation and does not include structures for banquets, public gatherings or public entertainment. "Farm crops and livestock" includes both fresh or processed farm crops and livestock grown on the farm operation.

(2) On parcels larger than 20 acres, replacement of a lawfully existing farm dwelling as specified in Subsection 5.8-115 shall be placed at the existing dwelling location; or at least 100 feet from the adjoining lines of property zoned EFU to minimize adverse effects on nearby farm lands outside the UGB; and in a location that does not impede future development of urban employment use or extension of urban infrastructure as shown in transportation plans, public facilities plans or master plans.

(3) Placement of new structures is subject to Water Quality Protection setbacks as specified in Subsection 4.3-115 and the Natural Resource Protection standards as specified in Subsection 4.3-117 where applicable.

(4) Proposed new uses or expansions of existing uses must demonstrate that the use will not generate vehicle trips exceeding pre-development levels.

(5) Signs shall not extend over a public right of way or project beyond the property line; shall not be illuminated or capable of movement; and shall be limited to 200 square feet in area.

The AG zone also implements the Natural Resource designation on the North Gateway sites as follows:

Commentary. The list of allowed activities for lands designated Natural Resource is derived from the existing Natural Resource Protection Areas standards in SDC 4.3-117.

B. Allowed Interim Uses for Lands Designated Natural Resource (6),(7)	
Continuation of normal farm practices such as grazing, plowing, planting, cultivating and harvesting. **(6)**	**P**
Wetland and/or riparian restoration and rehabilitation activities	**P**
Vegetation management necessary to control invasive vegetation or to reduce a hazard to life or property.	**P**
Removal of non-native vegetation, if replaced with native plant species at a density that prevents soil erosion and encourages the future dominance of the native vegetation.	**P**
Maintenance of existing drainage ways, ditches, or other structures to maintain flows at original design capacity and mitigate upstream flooding, provided that management practices avoid sedimentation and impact to native vegetation and any spoils are be placed in uplands.	**P**
Waterway restoration and rehabilitation activities such as channel widening, realignment to add meanders, bank grading, terracing, reconstruction of street crossings, or water flow improvements.	**P**
Emergency stream bank stabilization to remedy immediate threats to life or property.**(7)**	**P**
Bioswales or similar water quality improvement projects;	**P**

Public multi-use paths, access ways, trails, picnic areas, or interpretive and educational displays and overlooks, including benches and outdoor furniture.	**P**
Utilities and Communication	
High Impact Public Utility Facility as specified in Subsection 4.7-160	**S/D**
Low Impact Public Utility Facility	**D**

(6) Consistent with applicable wetland or land use permits issued by Federal, State or local approving authority with jurisdiction over wetland or riparian resources, including the Water Quality Protection provisions in Subsection 4.3-115 and Section 3.3-400 Floodplain Overlay District.

(7) Federal, State or local emergency authorization may be needed for in-stream work.

AG zone 3.2-920 addresses pre-existing and non-conforming uses as follows:

3.2-920 Pre-existing and Non-conforming Uses

A. Continuance, expansion, modification or replacement of lawful uses existing on a property at the time of the effective date of this zone are determined and permitted as otherwise specified in Section 5.8-100 of this Code; and

B. The Applicant shall submit evidence to demonstrate that the expansion or modification:

1. will not generate vehicle trips exceeding pre-development levels;

2. will not force a significant change in accepted farm practices on surrounding lands devoted to farm or forest use; and

3. will not significantly increase the cost of accepted farm or forest practices on surrounding lands devoted to farm or forest use.

AG zone 3.2-925 addresses placement of interim uses on a site so as not to impede eventual urban development and extension of infrastructure:

3.2-925 Standards for Interim Development

These regulations apply to the development of interim uses as specified in Subsection 3.2-915 and 3.2-920 in the AG District.

A. Receive certification from the Lane County Sanitarian that any proposed wastewater disposal system meets Oregon Department of Environmental Quality (D.E.Q.) standards prior to Development Approval.

B. Interim uses may not be placed on a site in manner that would future development of land designated Urban Holding Area-Employment with urban employment uses.

C. Interim uses may not be placed on a site in manner that would impede extension of infrastructure to serve land designated Urban Holding Area-Employment from developing with urban employment uses.

D. To demonstrate compliance with this provision, and in addition to the special provisions listed in Table A, the Applicant shall submit a Future Development Plan that:

1. Includes a brief narrative explaining the existing and proposed use of the property;

2. Indicates the proposed development footprint on a scaled plot plan of the property;

3. Limits the proposed new development footprint to ½ acre or less of the site;

4. Addresses future street connectivity as shown in the Transportation System Plan, Regional Transportation System Plan, Local Street Network Plan, Springfield Comprehensive Plan, applicable Refinement Plans and this Code;

5. Addresses the number and type of vehicle trips to be generated by the proposed use;

6. Addresses the applicable Natural Resources protection, Water Quality Limited Watercourses protection, Floodplain Overlay Development Standards, and Drinking Water Protection Overlay Development Standards of this Code.

AG zone 3.2-925 E. regulates land division and interim development through the following land use regulations:

Minimum Lot/Parcel Sizes	A 50-acre minimum lot/parcel size is applied to lots/parcels 50 acres or larger. A 20-acre minimum lot/parcel size is applied to lots/parcels less than 50 acres in size. Lots/parcels less than 20 acres in size may not be further divided. **(1)**
Main Building Height	35 feet
Accessory Building Height	35 feet **(2)**
Building/structure Setbacks: UHA-E designated parcels 20 acres and larger	20 feet from State, County, City roads, streets and local access roads. At least 100 feet from the adjoining lines of property zoned EFU; and in a location that does not impede future development of urban employment use or extension of urban infrastructure as shown in transportation plans, public facilities plans or master plans.
Building/structure Setbacks: UHA-E designated parcels smaller than 20 acres	20 feet from State, County, City roads, streets and local access roads. 10 feet from other property lines.
Minimum Lot/Parcel Frontage	None
Minimum Lot/Parcel Depth	None

(1) Exemption: Land divisions that create lots/parcels for the purpose of establishing a Natural Resource or Public/Semi-Public Parks and Open Space designation within the floodway, wetland or riparian resource portions of the site may create lots/parcels less than 20 acres within the Natural Resource or Public/Semi-Public Parks and Open Space designation portion of the parent lot/parcel.

(2) Water tanks, silos, granaries, barns and similar accessory structures or necessary mechanical appurtenances may exceed the minimum height standard.

It should be noted that the AG zone, when acknowledged, will be in effect for land currently zoned Exclusive Farm Use (EFU) by Lane County. The property subject to the AG zone is currently zoned EFU 30 and EFU 25 by Lane County, and subject to 30-acre and 25-acre minimum parcel sizes. The AG zone retains a restriction on land division to preserve large employment sites pursuant to the City's Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis and 2030 Comprehensive Plan Economic Element policies.

The existing Lane County EFU Zone setback standards found in Lane County Chapter 16.212 (10)(a)(ii) require dwellings to be sited at least 100 feet from the adjoining lines of property zoned EFU "to minimize impacts upon nearby farm uses or to assure optimal siting of proposed dwellings to minimize adverse impacts on nearby farm and forest lands." The setback standards found in Lane County Chapter 16.212 (10)(b) require 20 foot setbacks from the right of way of a State or County road or a local access public road and 10 foot setbacks from other property lines. Larger setbacks are established for riparian corridors. Other similar codes to the AG zone — such as the City of Redmond for Urban Holding-10 acre zone — require 50-foot front and rear yard setbacks and 10-foot side yard setbacks, and establish a maximum building height of 30 feet.

The City's proposed development standards for the AG zone are reasonable and provide the level of site protection required under OAR 660-009-0025(8).

Planning procedures required prior to rezoning land from Agriculture - Urban Holding Area (AG) to urban employment zoning designations. In addition to the standards, procedures and review criteria in Section 5.22-100 applicable to Zoning Map Amendments, AG zone 3.2-930 Table 1 provides an overview of the planning procedures required prior to rezoning land from Agriculture - Urban Holding Area (AG) to urban employment zoning designations (e.g. Employment, Employment Mixed Use, Campus Industrial, or Industrial). Table 1 shows both City and Owner-initiated planning processes.

3.2-930 Planning Requirements Applicable to Zoning Map Amendments

In addition to the standards, procedures and review criteria in Section 5.22-100 applicable to Zoning Map Amendments, Table 1 provides an overview of the planning procedures required prior to rezoning land from Agriculture - Urban Holding Area (AG) to urban employment zoning designations (e.g. Employment, Employment Mixed Use, Campus Industrial, or Industrial). Table 1 shows both City and Owner-initiated planning processes.

Table 1. Pre-Development Approval Process Steps – Urban Holding Areas	
City-initiated Planning Process	**Owner-initiated Planning Process**
1. City prepares Plan Amendment to address all applicable Statewide Planning Goals (e.g. amended or new refinement plan or district plan), Metro Plan and Springfield Comprehensive Plan policies and Springfield Development Code	1. Applicant submits request to City to initiate amendments to the Transportation System Plan and Public Facilities and Services Plan, and other city actions that may be required prior to plan amendment approval.

standards.	
2. City and Lane County approve Plan Amendment to amend Metro Plan and Springfield Comprehensive Plan. UHA-E designation is replaced with employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, or Industrial). AG zoning remains in effect until Master Plan and new zoning are approved.	2. Applicant prepares and submits Plan Amendment application to address all applicable Statewide Planning Goals, Metro Plan and Springfield Comprehensive Plan policies, and Springfield Development Code standards. Applicant proposes employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, or Industrial).
3. City prepares and approves Zoning Map Amendment to apply new zoning districts (e.g. Industrial, Campus Industrial, Employment Mixed Use, or Employment). Land is planned and zoned and eligible for annexation.	3. City and Lane County approve Plan Amendment to amend Metro Plan and Springfield Comprehensive Plan. UHA-E designation is replaced with employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, or Industrial). AG zoning remains in effect until Master Plan and new zoning are approved.
4. Applicant prepares and submits Preliminary Master Plan and annexation applications with demonstration of key urban service provision.	4. Applicant prepares and submits Preliminary Master Plan, proposed zoning and demonstration of key urban services provision. Applicant submits annexation application.
5. City approves City approves Master Plan and annexation.	5. City approves Master Plan and Zoning Map Amendment and annexation.
6. Applicant submits Site Plan, Subdivision and other applicable development applications.	6. Applicant submits Site Plan, Subdivision etc. development applications.

Conclusion OAR 660-009-0025(8): The City applied the "Urban Holding Area – Employment (UHA-E)" Metro Plan designation and Agriculture – Urban Holding Area (AG) Zoning District to the newly urbanizable lands it added to the UGB. Acting together, the designations serve as an interim "holding zone" to ensure that lands added to the UGB to meet specific large site employment land needs are reserved to meet those needs. The City's UHA-E designation and AG zone land use regulations ensure that lands added to the UGB to meet specific employment land needs identified in the City's CIBL/EOA are reserved, planned, zoned and prepared for development to meet those needs, as described in 2030 Urbanization Element policies.

OAR 660-009-0030 Multi-Jurisdiction Coordination

> *"(1) Cities and counties are strongly encouraged to coordinate when implementing OAR 660-009-0015 to 660-009-0025."*

While Springfield and Eugene are no longer sharing a UGB, and have chosen to prepare and develop city-specific economic opportunities analyses, and economic development policies — the cities and Lane

County continue to partner and coordinate through regional economic development planning activities. Regional economic development initiatives are directly reflected in the Springfield 2030 Economic Element.

Goal EG-2 states:

> ***"Support attainment of the Regional Prosperity Economic Development Plan[113] goals for creating new metropolitan area jobs in the chosen economic opportunity areas, increasing the average annual wage and reducing unemployment."***

Goal EG-5 states:

> ***"Support the development of emerging economies guided by the following principles:[114]***

a. Healthy Living—Champion businesses and entrepreneurs that promote a healthy, safe, and clean community while enhancing, protecting, and making wise use of natural resources.

b. Ideas to Enterprise—Encourage a culture of entrepreneurship and re-investment into the local community.

c. Regional Identity—Create a strong economic personality that celebrates our region's attributes and values.

d. Be Prepared—Contribute to development of the region's physical, social, educational, and workforce infrastructure to meet the needs of tomorrow.

e. Local Resilience— Support businesses and entrepreneurs that lead the city and region to greater economic independence, innovation, and growth of the traded sector economies."

<u>Conclusion OAR 660-009-0030:</u> Springfield, Eugene and Lane County have coordinated throughout the Metro Plan transition process and 2030 planning process, sharing information and collaborating to develop direction for the "future" Metro Plan to support respective comprehensive plans within the Eugene-Springfield Metro region.

Goal 9 Conclusion: For the reasons stated above and based on information found in the Springfield CIBL/EOA, the proposed Comprehensive Plan amendments comply with Goal 9.

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

[114] *Ibid.*

V. Statewide Planning Goal 14: Urbanization Employment Land Need and Response to Deficiency

OAR 660-015-0000(14)
To provide for an orderly and efficient transition from rural to urban land use, to accommodate urban population and urban employment inside urban growth boundaries, to ensure efficient use of land, and to provide for livable communities.

OAR 660-015-0000(14), OAR 660-024-0040(1), OAR 660-024-0040(5), OAR 660-024-0050(1), and OAR 660-024-0050 (4)

The standards for amending an urban growth boundary (UGB) are found in Statewide Planning Goal 14 (Urbanization), and in ORS 197.298 Priorities for urban growth boundary amendments. The Goal 14 rule (OAR Chapter 660, Division 024) interprets and clarifies the more general language of Goal 14 and explains the relationship between statutory "priorities" and Goal 14 "location factors." In the Goal 14 rule findings below, *text shown in italic is quoted directly from the referenced goal, rule or statute*.

Goal 14 describes how land needs — including employment land needs — shall form the basis for changes to UGBs: *"Land Need. Establishment and change of urban growth boundaries shall be based on the following:*

> *(1) Demonstrated need to accommodate long range urban population, consistent with a 20-year affected local governments; and*
>
> *(2) Demonstrated need for housing, employment opportunities, livability or uses such as public facilities, streets and roads, schools, parks or open space, or any combination of the need categories in this subsection (2).*
>
> *In determining need, local government may specify characteristics, such as parcel size, topography or proximity, necessary for land to be suitable for an identified need.*
>
> *Prior to expanding an urban growth boundary, local governments shall demonstrate that needs cannot reasonably be accommodated on land already inside the urban growth boundary."* [OAR 660-015-0000(14)]

Relationship between Goal 9 and Goal 14

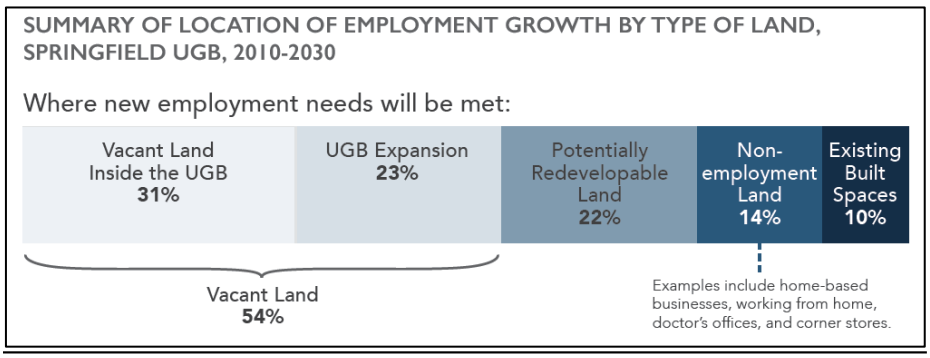
The City is expanding the UGB to provide land to meet specific employment land needs, thus the City's findings must demonstrate how the City's analyses of land need and boundary location alternatives properly addressed the relationship between Goals 9 and 14 and balanced compliance with both planning goals. The City does this by demonstrating how the factors in its decisions about land need under Goal 9 and the proposed UGB boundary location were balanced consistent with Goal 14: Urbanization — *"to provide for an orderly and efficient transition from rural to urban land use, to*

accommodate urban population and urban employment inside urban growth boundaries, to ensure efficient use of land, and to provide for livable communities."

The City's findings under Goals 11, 12 and OAR 660-024-0060 explain how, in its response to meeting the City's employment land deficit under Goal 9, the City carefully considered coordination of land use, transportation and public facilities planning [OAR 660-024-0040(7)], based on substantial evidence, to inform its policy choices.

Goal 14 allows cities to specify characteristics necessary for land to be suitable for identified need. As explained and referenced in the City's findings under Goal 9, the Springfield CIBL/EOA identifies specific parcel size, topographical and proximity characteristics necessary to meet the operational requirements for targeted employment types, including businesses and industries that require industrial and commercial mixed-use sites larger than 5 acres.

Goal 14 requires the City to seek to accommodate the identified 20-year land needs on land already inside the urban growth boundary before expanding the UGB [OAR 660-015-0000(14)]. The City must explain and provide substantial evidence as required by Goal 9 to demonstrate that the existing land supply cannot reasonably provide suitable sites to accommodate the economic opportunities identified in the CIBL/EOA. The City's 2030 comprehensive plan policies, plan designations and implementation measures provide employment sites within the existing UGB to accommodate 77% of Springfield's forecast employment.[115] [116]



The 2030 Plan and UGB amendment provide land to meet long-term employment land site needs that cannot reasonably be accommodated on land already inside the urban growth boundary. The City's 2030 comprehensive plan policies, plan designations and implementation measures provide a 20-year supply of employment land on sites within two UGB expansion areas: the North Gateway and Mill Race sites (23% of forecast employment). The UGB expansion provides land to accommodate industrial and commercial mixed-use target industries' site needs on sites larger than 5 acres, including 2 large industrial employment sites on 126 acres and 5 large commercial mixed-use employment sites on 97 acres. The City designated the suitable, unconstrained lands it added to the UGB "Urban Holding Area –

[115] CIBL/EOA, Appendix C Employment Forecast and Site Needs for Industrial and Other Employment Uses, pp. 153-160.

[116] See Exhibit F-1 Supplemental Findings for more discussion of the CIBL inventory land classifications and the portion of employment to be accommodated through redevelopment.

Employment (UHA-E)" to provide a 20-year supply of employment land to accommodate the need for large sites.

The 2030 Plan Economic and Urbanization Element policies identify these specific employment site needs and establish special planning requirements and zoning regulations to reserve the sites added to the UGB for the intended large site employment purposes. The proposed Metro Plan diagram plan amendment applies the Urban Holding Area - Employment (UHA-E) plan designation. The proposed Zoning Map amendment applies Agriculture—Urban Holding Area (AG) urban transition zoning to protect the large employment sites from land divisions and incompatible interim development. Together, these actions plan and zone lands added to the UGB for employment to establish minimum parcel sizes, topographical (flat topography) and proximity characteristics necessary to meet the operational requirements for targeted employment types.

The City's CIBL/EOA provides substantial evidence to support the City's policy choice under Goals 9 and 14 — expanding the UGB to add large sites to support economic opportunities and diversification of the economy. As stated in the CIBL/EOA pages 95-97:

- *"Economic growth. Decision makers and community members that participated in the economic opportunities analysis agreed that economic growth is desirable over the planning period. The employment forecast indicates Springfield will add 13,440 new employees between 2010 and 2030 using the OAR 660-024-0040(8)(a)(ii) methodology. The economic opportunities analysis assumes that Springfield will have employment growth in a wide variety of businesses, from services and retail for residents to industrial development to medical services. <u>The City wants to diversify its economy and attract higher wage and professional jobs.</u>"* (emphasis added)

- *"Buildable lands. Springfield has 3,414 acres that are designated for industrial and other employment use. About two-thirds of the land designated for employment within Springfield's UGB is considered developed and is not expected to redevelop over the 20 year planning period. Less than 15% of this land is buildable, unconstrained land. The majority of buildable, unconstrained employment land in Springfield has existing development on it that is expected to redevelop over the planning period. <u>Springfield has a lack of buildable large sites, with one buildable site 20 acres and larger and 22 buildable sites in the five to 20 acre size range.</u>"* (emphasis added)

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

- *"For example, in the past twenty years, most of the Gateway area developed. The area has a mix of uses including the International Way campus employment district, regional mall, apartments, offices, and more recently, the PeaceHealth RiverBend Medical Center Campus. Twenty-years ago it would have seemed highly unlikely that PeaceHealth would build their new regional*

facility in Springfield. If the City had not had desirable, serviceable land available, PeaceHealth would probably not have located their new facility in Springfield. Over the last 20 years, employment and commerce in the Gateway area has become a local and regional economic engine and major employment center. In 2006, the Gateway area had 33% of Springfield's employment (more than 9,800 employees) and 33% of payroll in the city, at $325 million. By 2009, Gateway accounted for nearly 36% of the city's employment and $368 million in payroll. In 2013, employment in the Gateway area accounted for 40% of employment in Springfield (more than 10,700 employees) and 43% of payroll in the city."[117]

Capacity to Absorb Growth within the Existing UGB

Prior to expanding an urban growth boundary, the City analyzed the capacity of land within the existing UGB to provide the needed sites, as required by Goals 9 and 14. As described in the City's findings under Goal 9, and in the CIBL/EOA, the City has demonstrated that the identified need for employment sites larger than 5 acres cannot reasonably be accommodated on land already inside the urban growth boundary. Therefore, the City chose to expand the boundary to include suitable large sites. As stated in the CIBL/EOA pages 93-94, the City determined that the large site need could not reasonably be accommodated through redesignation or site assembly and provided substantial evidence to support the conclusions reached.

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

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

- *"Site assembly. Assembly of numerous small sites into 5 to 10 acre sites is difficult at best and often not feasible. Map 2-3 shows that of industrial- and commercial-designated sites are scattered throughout the City, generally along Main Street or in Mid- Springfield, and the majority of sites are smaller than 2 acres. Land assembly is difficult and often costly. Developers attempting land assembly often have difficulty assembling a site at a cost that makes development economically viable. When assembling land, developers often find that owners of key sites are not willing sellers, have unrealistic expectations of the value of their land, or cannot*

[117] Kim Thompson, Oregon Employment Department, "The Gateway Area & Growth in Springfield", presentation to Gateway Development Committee, October 24, 2014.

get agreement among multiple owners to sell the land. As a result, developers, especially developers of industrial buildings, typically choose to develop sites with one or two owners." (emphasis added)[118]

- *Need to expand the UGB to accommodate need for large sites. Springfield's need for large sites cannot be met within the UGB. Meeting this need for large sites for large employers requires the City to expand its UGB into areas with suitable sites. These areas will have relatively large, flat sites with little parcelization and few owners, where businesses will have access to I-5 or a State highway*." (emphasis added)

The CIBL/EOA is the City's inventory and analysis of commercial and industrial land required under Goal 9. As explained in the CIBL/EOA, and in the City's findings under Goal 9, the City's employment land need analysis, prepared by ECONorthwest, used a "site needs" approach, based on ECONorthwest's expertise, trends and substantial evidence to determine the number of sites and the required characteristics [ORS 197.712(2)(c)][119] and the Goal 9 Administrative Rule.

The need to expand the UGB to address the City's deficit of sites larger than 5 acres, including sites larger than 20 acres, was determined in the CIBL/EOA. The City's findings under OAR 660-009-0020(1)(c), as explained in CIBL/EOA Chapter 5[120] Land Capacity and Demand demonstrate that the City conducted analysis to determine how employment capacity could be provided within the existing UGB prior to expanding its urban growth boundary.

- The CIBL/EOA analysis identified lands with redevelopment potential.
- The CIBL/EOA analysis identified sites smaller than 5 acres with redevelopment potential in Table 2-11 and Table 5-1.
- The CIBL/EOA analysis identified sites larger than 5 acres with redevelopment potential in Table 2-11 and Table 5-1.

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[118] See Exhibit F-1 Supplemental Findings, p. 38.

[119] ORS 197.712*****"the Legislative Assembly finds and declares that, in carrying out statewide comprehensive land use planning, the provision of adequate opportunities for a variety of economic activities throughout the state is vital to the health, welfare and prosperity of all the people of the state.*
(2) By the adoption of new goals or rules, or the application, interpretation or amendment of existing goals or rules, the Land Conservation and Development Commission shall implement all of the following:
(a) Comprehensive plans shall include an analysis of the community's economic patterns, potentialities, strengths and deficiencies as they relate to state and national trends.
(b) Comprehensive plans shall contain policies concerning the economic development opportunities in the community.
(c) Comprehensive plans and land use regulations shall provide for at least an adequate supply of sites of suitable sizes, types, locations and service levels for industrial and commercial uses consistent with plan policies.
(d) Comprehensive plans and land use regulations shall provide for compatible uses on or near sites zoned for specific industrial and commercial uses." (emphasis added)

[120] CIBL/EOA, pp. 77-82,

- CIBL/EOA Table 2-12 presents a site-by-site evaluation of redevelopment potential of sites identified as potentially redevelopable in Table 2-11. Table 5-1 includes all of the sites identified as providing an opportunity for redevelopment of a 5-acre site (in Table 2-12) as potentially redevelopable sites over the planning period.
- The CIBL/EOA determined redevelopment capacity as follows:
    - All sites 5 acres and smaller that were identified as having redevelopment potential may redevelop over the 2010-2030 period.
    - Five sites between 5-20 acres and one site 20 acres and larger are likely to redevelop over the 2010-2030 period. Table 2-12 provides a site-by-site evaluation of redevelopment potential for sites larger than 5 acres.
    - As shown in CIBL/EOA Table 5-1, Springfield concludes that 188 industrial sites and 340 commercial and mixed use sites would redevelop to address land needs over the 20-year period. In addition to this assumption about redevelopment**,** Springfield concludes that all land needs on sites smaller than five acres would be accommodated through redevelopment.
- To accommodate Springfield's forecast employment growth of 13,440 employees over the 2010-2030 planning period, the City's CIBL/EOA assumes the following:
    - 14% of new employment (1,918 employees) will locate on land not designated for employment use, such as residential land (Table C-12).
    - 10% of new employment (1,344 employees) will locate in existing commercial or industrial built space, such as vacant buildings or office spaces (Table C-12).
    - 22% of new employment (about 2,921 employees) will locate on potentially redevelopable sites, where redevelopment results in an increase in the amount of employment accommodated on the site (Table 5-1 shows assumptions about potentially redevelopable sites and Table C-6 shows that need for sites smaller than 5 acres will be accommodated through redevelopment).
    - 54% of new employment (about 7,256 employees) will locate on land that is currently vacant, including land within the UGB and sites that Springfield does not currently have within the UGB (Table 5-1 and Table C-6).

As explained in the City's findings under Goal 9, the City conducted the required analysis to determine how employment capacity could be provided within the existing UGB prior to expanding the UGB. The City conducted a reasonable level of analysis to determine redevelopment potential of sites within the existing UGB to add capacity. The City's assumptions and conclusions are consistent with Goal 14 because the City's CIBL/EOA determined how employment capacity could be provided within the existing UGB prior to expanding its urban growth boundary and the City's policy choices were based on substantial evidence.

The CIBL/EOA provides substantial evidence to explain the City's assumption about capacity reasonably likely to be provided by the "potentially redevelopable" sites larger than 5 acres to accommodate needed employment sites larger than 5 acres. The City conducted site-by-site evaluation of sites 5 acres and larger with redevelopment potential to determine whether it is reasonable for the City to assume

that some or all of these sites could meet the identified need for sites larger than 5 acres. As shown in CIBL/EOA (pp. 33-39), Table 2-12 and explanatory text, the City finds that is reasonable to assume that 7 of these 14 potentially redevelopable sites 5 acres and larger offer opportunities for redevelopment once site constraints, configuration issues, and existing employment uses are accounted for. These sites are:

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

- One site larger than 20 acres in size:
    - 36-acre site in the Jasper-Natron Special Heavy Industrial District

The City assumed that all land needs for sites smaller than 5 acres could be accommodated on land already inside the urban growth boundary.

The City's assumptions, conclusions and policy choices about accommodating 46% of forecast employment growth on land already inside the UGB are reasonable and based on substantial evidence.

The City has conducted the required analysis and has provided sufficient evidence demonstrating that all of its employment needs cannot be accommodated on land already inside the urban growth boundary, thus the City proposed to amend the UGB to provide land designated to provide suitable sites larger than 5 acres and larger than 20 acres to meet those needs.

2030 Plan Compliance with Goal 14 [OAR 660-015-0000(14)]

<u>Urban Growth Boundary and Urbanization Policies</u>

> *Urban growth boundaries shall be established and maintained by cities, counties and regional governments to provide land for urban development needs and to identify and separate urban and urbanizable land from rural land. Establishment and change of urban growth boundaries shall be a cooperative process among cities, counties and, where applicable, regional governments. An urban growth boundary and amendments to the boundary shall be adopted by all cities within the boundary and by the county or counties within which the boundary is located, consistent with intergovernmental agreements…*

Amendment of Springfield's UGB is a cooperative process between the City of Springfield and Lane County. The City Council adopted the amended UGB on December 5, 2016, Ordinance No. 6361; Lane County adopted the amended UGB on December 6, 2016, Ordinance No. 1304.

Goal 14 addresses how cities and counties must plan and zone land within urban growth boundaries to manage the long term land supply:

> **"Urbanizable Land.** *Land within urban growth boundaries shall be considered available for urban development consistent with plans for the provision of urban facilities and services. Comprehensive plans and implementing measures shall manage the use and division of urbanizable land to maintain its potential for planned urban development until appropriate public facilities and services are available or planned."* OAR 660-015-0000(14)

The City's 2030 Plan Economic and Urbanization Element comprehensive policies identify specific industrial site needs and commercial mixed-use employment site needs and establish special planning requirements and zoning regulations to reserve these sites for the intended large site employment purposes.

The City amended the Metro Plan text to establish the Urban Holding Area - Employment (UHA-E) plan designation.

The City amended the Metro Plan diagram to apply the Urban Holding Area - Employment (UHA-E) plan designation to the lands added to the UGB to meet employment land needs.

The City amended the Springfield Development Code to establish the Agriculture – Urban Holding Area (AG) urban transition zoning to protect the large employment sites added to the UGB to meet employment land needs from land divisions and incompatible interim development.

The City amended the Springfield Zoning Map to apply the Agriculture – Urban Holding Area (AG) urban transition zoning to protect the large employment sites from land divisions and incompatible interim development.

The City's amendments to the comprehensive plan designate urbanizable lands suitable for employment, and protect those sites from land divisions and incompatible interim development by applying plan designations, comprehensive plan urbanization policies and implementing zoning measures.

Implementation of the 2030 Plan amendments will manage the interim use and division of urbanizable employment land with suitable parcel size, topographical and proximity characteristics that are necessary to meet specific operational required by targeted employment types.

Implementation of the 2030 Plan amendments will function to reserve lands with specific operational required by targeted employment types, as described in the City's EOA and substantiated with an

adequate factual base in the record, to maintain the land's potential for planned urban development of urban employment uses and densities, as required by Goal 14.

Implementation of the 2030 Plan amendments will manage the interim use and division of urbanizable employment land to maintain the land's potential for planned urban development of urban employment uses and densities until appropriate public facilities and services are available or planned, as required by Goal 14.

The City and Lane County adopted 2030 Urbanization Element policies to replace the more generalized regional policies in the Metro Plan. The 2030 Urbanization Element is the chapter of the 2030 Plan that guides future development in Springfield by describing how and where land will be developed and infrastructure provided to meet long term growth needs while maintaining and improving community livability. The purpose of the Urbanization Element is to inform and guide long range land use and public facilities planning to address Springfield's land needs for the planning period 2010-2030 in compliance with Statewide Planning Goal 14, Urbanization. The Urbanization Element establishes the comprehensive plan policies and zoning applicable to urbanizable lands within Springfield's Urban Growth Boundary (UGB) that are necessary to efficiently and effectively plan and manage the land supply as land uses transition from rural to urban. This policy direction is based on the need to:

- Designate a 20-year supply of urbanizable land to accommodate population and employment growth.
- Allow and regulate interim land uses that do not impede future development of planned urban land uses and densities.
- Plan for the orderly and efficient extension of public facilities and services.
- Designate land for community open space and recreational needs.
- Designate land to provide and manage the public facilities and environmental services needed to serve Springfield's urban area.
- Manage growth and improve community livability through increasingly efficient use of land consistent and compatible with the community's needs, resources, opportunities and advantages within the broader Southern Willamette Valley region.

The guidelines in Goal 14 state that plans "should" designate sufficient amounts of urbanizable land to accommodate the need for further urban expansion, taking into account (1) the growth policy of the area; (2) the needs of the forecast population; (3) the carrying capacity of the planning area; and (4) open space and recreational needs.

Springfield's 2030 Plan designates sufficient amounts of urbanizable land to accommodate the needs of the forecast population's need for housing and employment; adds land designated Public/Semi-Public to accommodate a portion of the area's open space and recreational needs; and adds land designated Natural Resource and Public/Semi-Public to maintain open space, conserve resources, and conserve the quantity and quality of Springfield's drinking water supply. 2030 Urbanization Element policies require refinement-level comprehensive planning for the

lands designated Urban Holding Area – Employment to ensure that urban uses and densities can be accommodated within the carrying capacity of the planning area.

The guidelines in Goal 14 state: *"The size of the parcels of urbanizable land that are converted to urban land should be of adequate dimension so as to maximize the utility of the land resource and enable the logical and efficient extension of services to such parcels."*

The urbanizable land added to the UGB in Springfield's 2030 Comprehensive Plan is primarily large parcels in single ownership because Springfield's employment land deficit is sites larger than 5 acres, including 3 sites larger than 20 acres. Parcels are of adequate dimension so as to maximize the utility of the land resource and enable the logical and efficient extension of services to such parcels. 2030 Urbanization Element policies require retention of UHA-E designated large parcels (20-acre and 50-acre minimum parcel sizes). The AG District includes provisions to limit the division of land and prohibit urban development. A 50-acre minimum lot size is applied to lots/parcels greater than 50 acres and a 20-acre minimum lot size is applied to lots/parcels less than 50 acres to protect undeveloped sites from inefficient piecemeal development until land is planned and zoned to allow annexation and site development with urban employment uses and densities.

The guidelines in Goal 14 state: *"Plans providing for the transition from rural to urban land use should take into consideration as to a major determinant the carrying capacity of the air, land and water resources of the planning area. The land conservation and development actions provided for by such plans should not exceed the carrying capacity of such resources."*

The guidelines in Goal 14 state: "*Comprehensive plans and implementing measures for land inside urban growth boundaries should encourage the efficient use of land and the development of livable communities."*

The 2030 Urbanization Element policies and AG zone land use regulations address the transition from rural to urban land uses and require newly urbanizable areas to be planned comprehensively to address air, land and water resources of the planning area — as required by Oregon and federal law — to ensure that urban uses and densities can provide needed capacity for employment growth and enhance overall community livability. The UGB Alternatives Analysis process addressed and compared the relative ESEE consequences of potentially suitable expansion location alternatives to assess potential threats or benefits to air, land and water resources. To determine capacity issues, the UGB Alternatives Analysis process included planning–level assessments of infrastructure (e.g. wastewater, water, stormwater management) and transportation facilities needed to serve alternate locations. The Metro Wastewater (MWMC) Treatment Facility has capacity to treat wastewater from the two proposed UGB expansion areas. The Urbanization Element provides policies and implementation strategies to implement the following goals:

> ***UG-4 As the City grows and as land develops, maintain and reinforce Springfield's identity as a river-oriented community emphasizing and strengthening physical***

connections between people and nature in the City's land development patterns and green infrastructure systems.

UG-5 Increase Springfield's capability to respond to natural hazard impacts and to enhance public safety, health and robustness of the economy and natural environment. Create opportunities for innovative urban development and economic diversification.

Future design and development of public infrastructure and private development in the urbanizable lands designated Urban Holding Area – Employment will require the use of "green infrastructure" systems and other low impact development practices to manage stormwater, and to maintain and improve water quality. Refinement-level comprehensive planning will identify locations and/or conceptual alignments of "green infrastructure" systems.

2030 Urbanization Element Policy 50 states:

"Grow and develop the City in ways that will to ensure the stability of Springfield's public drinking water supply to meet current and future needs.

- ***Prior to City approval of annexation, land division or site development in the North Gateway and Mill Race UHA-E districts, the City — in partnership with Springfield Utility Board — shall conduct a Springfield Development Code Amendment process to prepare and apply specialized development standards that protect Drinking Water Source Areas to urbanizable lands designated UHA-E to ensure that new development contributes to a safe, clean, healthy, and plentiful community drinking water supply. The standards shall identify design, development, construction and best management processes appropriate and necessary to maintain aquifer recharge and protect drinking water quality and quantity. The standards shall also identify land use buffers appropriate and necessary to protect the Willamette Wellfield and the surface water features that are known to be in hydraulic connection with the alluvial aquifer.***
- ***Continue to Update the Springfield Comprehensive Plan and Springfield Development Code as new natural hazards information becomes available.***
- ***Encourage increased integration of natural systems into the built environment, such as vegetated water quality stormwater management systems and energy-efficient buildings."***

2030 Urbanization Element Policy 51 states:

"Grow and develop the City in ways that maintain and improve Springfield's air quality to benefit public health and the environment.

- ***Prioritize and seek funding for mixed use land use district planning and multi-modal transportation projects that reduce reliance on single occupancy***

vehicles (SOVs) consistent with Springfield Transportation System Plan (TSP) Policy 1.2, 1.3 and 1.4.

- ***Coordinate land use and transportation system planning for urbanizable lands at the refinement plan and/or Master Plan level to identify and conceptually plan alignments for locating multi – modal facilities.***

- ***Plan, zone and design transportation systems in the North Gateway and Mill Race Urban Holding Area - Employment districts to provide multi-modal transportation choices for district employees.***

- ***Promote the use of active transportation systems as new growth areas and significant new infrastructure are planned and developed."***

The guidelines in Goal 14 state: "*The type, design, phasing and location of major public transportation facilities (i.e., all modes: air, marine, rail, mass transit, highways, bicycle and pedestrian) and improvements thereto are factors which should be utilized to support urban expansion into urbanizable areas and restrict it from rural areas."*

The 2030 Plan amendments encourage and require the efficient use of land and development of livable communities within Springfield's UGB by establishing a land base for employment that relies on existing developed land to meet 46% of employment growth; by accommodating 77% of employment growth within the existing UGB; by accommodating all employment land needs for sites smaller than 5 acres without expanding the UGB; by expanding the UGB to support economic diversification and job creation in areas that are proximate to the existing and planned public transit system; and through 2030 Plan Economic Element policies that promote higher density mixed-use development in locations served by the region's Frequent Transit Network (FTN).

The City's 2030 Plan directs urban expansion for employment to urbanizable sites within the existing UGB and UF-10 Overlay Zoning District through the annexation process and to newly urbanizable sites in the North Gateway and Mill Race UGB expansion areas. The City's priority location for short term urban expansion is the Glenwood Riverfront/Franklin Corridor. In 2015, the area is beginning to urbanize, but many unincorporated urbanizable sites remain and are expected to redevelop in the planning period to provide sites to meet employment land needs. The area is part of the City's Glenwood Urban Renewal District. The City is using tax increment financing to phase public facilities and services to support redevelopment of the area.

The UGB Alternatives Analysis process assessed the type, location and potential phasing of public facilities and services as important factors in reviewing the feasibility and cost of extending facilities and services to alternative locations for urban expansion. The City Engineer provided planning–level assessments of infrastructure (e.g. wastewater, water, stormwater management) and transportation

facilities needed to serve alternate locations and estimated costs associated with providing facilities and services. The Metro Wastewater (MWMC) Treatment Facility has capacity to treat wastewater from the two proposed UGB expansion areas. 2030 Plan Urbanization Element policies address urban expansion and extension of infrastructure.

Natural Resource (NR) Metro Plan Designation - North Gateway Site

Land in North Gateway brought into Springfield's UGB to address 2010-2030 land needs for suitable large employment sites includes portions of properties within the floodway of the McKenzie River. Land in the floodway is considered to be constrained for development and is not counted as developable in the City's land Inventories. Including the floodway portion of the site in the UGB allows consistent land use administration of the floodplain pursuant to the purposes and standards of the Springfield Development Code Floodplain Overlay District standards. The portion of the site North Gateway site within the FEMA floodway is designated Natural Resource, a designation applied to privately and publicly owned lands where development and conflicting uses are prohibited to protect natural resource values. In addition to the purposes of the Floodplain Overlay District, land designated Natural Resource is protected and managed for fish and wildlife habitat, soil conservation, watershed conservation, scenic resources, passive recreational opportunities, vegetative cover, and open space.[121]

Table 3: Urbanizable Land Designated Natural Resource (NR)

Name of Area	Acres Designated Natural Resource	Acres Zoned AG	Location
North Gateway Natural Resource (NR)	53	53	North of Gateway/International Way, east of I-5

Conclusion Goal 14 OAR 660-015-0000(14): The land need determination and response to deficiency proposed in the 2030 Plan amendments are consistent with Goal 14, OAR 660-024-0040 and OAR 660-024-0050 because the amended UGB is based on demonstrated need for employment opportunities, livability public facilities, parks and open space. The City conducted the required inventory and analysis and assumed, based on substantial evidence that 77% of forecast employment could reasonably be accommodated within the existing UGB, and that the proposed UGB expansion is necessary to accommodate needs cannot reasonably be accommodated on land already inside the urban growth boundary. The City has a 223-acre deficit of suitable large employment sites with specific characteristics that are necessary for target industry employers the City selected in the CIBL/EOA. The City expanded the UGB to provide at least 223 suitable acres to meet the deficit.

[121] Ordinance No. 6361 Exhibit C-1, 2030 Plan Urbanization Element, p. 12.

Division 24 Urban Growth Boundaries

OAR 660-024-0000 Purpose and Applicability

OAR 660-024-0000(4)

> *"The rules in this division adopted on December 4, 2015, are effective January 1, 2016, except that a local government may choose to not apply the amendments to rules in this division adopted December 4, 2015 to a plan amendment concerning the amendment of a UGB, regardless of the date of that amendment, if the local government initiated the amendment of the UGB prior to January 1, 2016."*

The 2030 Plan amendment of the UGB was initiated on December 31, 2009 and was prepared to address the requirements of the applicable statutes and rules in effect at that time, including ORS 197.298 and Division 24 Urban Growth Boundaries cert. ef. 4-16-09.

The City issued the public notice specified in OAR 660-018-0020 for the proposed plan amendment concerning the evaluation or amendment of the UGB on December 31, 2009, under the rules in Division 24 that were adopted prior to that date, and effective April 16, 2009.

OAR 660-024-0000(3)(c)

> *"A local government choice whether to apply this division must include the entire division and may not differ with respect to individual rules in the division."*

As permitted under OAR 660-024-0000(4) the City's proposal applies Division 24 Urban Growth Boundaries cert. ef. 4-16-09.

<u>Conclusion OAR 660-024-0000:</u> The City's proposal is consistent with OAR 660-024-0000. The City's findings under Goal 14 are organized under ORS 197.298 and the Division 24 administrative rule effective prior to January 1, 2016.

OAR 660-024-0010 Goal 14 Definitions Applicable to Springfield's UGB Analysis

OAR 660-024-0010 Definitions states:

> *"In this division, the definitions in the statewide goals and the following definitions apply…"*

The definitions in the statewide goals and the following definitions in Division 24 are applicable to Springfield's demonstration of compliance with Division 24:

> *(2) "EOA" means an economic opportunities analysis carried out under OAR 660-009-0015.*

(7) "Safe harbor" means an optional course of action that a local government may use to satisfy a requirement of Goal 14. Use of a safe harbor prescribed in this division will satisfy the requirement for which it is prescribed. A safe harbor is not the only way or necessarily the preferred way to comply with a requirement and it is not intended to interpret the requirement for any purpose other than applying a safe harbor within this division.

(8) "Suitable vacant and developed land" describes land for employment opportunities, and has the same meaning as provided in OAR 660-009-0005 section (1) for "developed land," section (12) for "suitable," and section (14) for "vacant land."

The definition of "suitable" as provided in OAR 660-009-0005 section (12) is a key element in Springfield's inventory and analysis of employment land need, in the city's finding that all employment land needs cannot be met on lands within the UGB, and the City's decision to amend the UGB to add suitable land to meet identified employment land needs.

OAR 660-024-0020 Adoption or Amendment of a UGB

OAR 660-024-0020(1)

"All statewide goals and related administrative rules are applicable when establishing or amending a UGB, except as follows:

Pages 17-18 of these findings address the statewide goals and related administrative rules applicable when establishing or amending a UGB.

(a) The exceptions process in Goal 2 and OAR chapter 660, division 4, is not applicable unless a local government chooses to take an exception to a particular goal requirement, for example, as provided in OAR 660-004-0010(1);

(b) Goals 3 and 4 are not applicable;

(c) Goal 5 and related rules under OAR chapter 660, division 23, apply only in areas added to the UGB, except as required under OAR 660-023-0070 and 660-023-0250;

Pages 443-454 of these findings address Goal 5 as it applies only in areas added to the UGB, except as required under OAR 660-023-0070 and 660-023-0250.

(d) The transportation planning rule requirements under OAR 660-012-0060 need not be applied to a UGB amendment if the land added to the UGB is zoned as urbanizable land, either by retaining the zoning that was assigned prior to inclusion in the boundary or by assigning interim zoning that does not allow development that would generate more vehicle trips than development allowed by the zoning assigned prior to inclusion in the boundary;

Pages 486-520, 208-211, 395-400 of these findings address Goal 12.

(e) Goal 15 is not applicable to land added to the UGB unless the land is within the Willamette River Greenway Boundary;

The proposed UGB includes land within the Willamette River Greenway Boundary. Pages 431-435 of these findings address Goal 15.

(f) Goals 16 to 18 are not applicable to land added to the UGB unless the land is within a coastal shorelands boundary;

(g) Goal 19 is not applicable to a UGB amendment.

As stated on page 18, Goal 10 is not applicable.

Conclusion OAR 660-024-0020 (1) The City addressed all applicable statewide goals and related administrative rules when the City and Lane County amended the UGB.

OAR 660-024-0020(2)

"The UGB and amendments to the UGB must be shown on the city and county plan and zone maps at a scale sufficient to determine which particular lots or parcels are included in the UGB. Where a UGB does not follow lot or parcel lines, the map must provide sufficient information to determine the precise UGB location."

Conclusion OAR 660-024-0020(2): Ordinance Exhibit A includes plan designation and zoning maps at a scale sufficient to determine which particular lots or parcels are included in the UGB. Exhibit C includes the amended UGB map at a scale sufficient to determine which particular lots or parcels are included in the UGB. Exhibit C-2 provides more detailed description of the amended boundary, providing sufficient information to determine the precise UGB location.

OAR 660-024-0030(1) Coordinated Population Forecast

"Counties must adopt and maintain a coordinated 20-year population forecast for the county and for each urban area within the county consistent with statutory requirements for such forecasts under ORS 195.025 and 195.036. Cities must adopt a 20-year population forecast for the urban area consistent with the coordinated county forecast, except that a metropolitan service district must adopt and maintain a 20-year population forecast for the area within its jurisdiction. In adopting the coordinated forecast, local governments must follow applicable procedures and requirements in ORS 197.610 to 197.650 and must provide notice to all other local governments in the county. The adopted forecast must be included in the comprehensive plan or in a document referenced by the plan."

Springfield's current UGB (acknowledged in 2011) and amended UGB is based on a coordinated population forecast adopted by Lane County. In order to achieve timely compliance with their statutory obligations under ORS 197.304 (2007) Or Laws Chapter 650, the cities of Eugene and Springfield and Lane County co-adopted coordinated population forecasts into the Metro Plan for Springfield's jurisdictional areas. On June 17th, 2009, Lane County adopted a coordinated 20-year population forecast for each urban area within the county consistent with statutory requirements for such forecasts under ORS 195.025 and 195.036. The forecast provided separate forecasts for the metro urban area east of I-5 (Springfield) and west of I-5 (Eugene) through 2035. The City of Springfield adopted the 20-year population forecast for the urban area consistent with the coordinated county forecast. As described and demonstrated in the adopted findings for Lane County Ordinance PA1255; Springfield Ordinance 6248, adopted October 19, 2009 Springfield Planning File nos. LRP 2009-00005, LRP 2009-0006, the forecast was developed by Portland State University using commonly accepted practices and standards for population forecasting used by professional practitioners in the field of demography or economics, and was based on current, reliable and objective sources and verifiable factual information.

The adopted forecast has been included in the comprehensive plan. Eugene–Springfield Metro Plan text Chapter I, Introduction Purpose Section on page I-1 was amended to incorporate the forecast into the comprehensive plan. [Lane County Ordinance PA1255; Springfield Ordinance 6248, adopted October 19, 2009 Springfield Planning File nos. LRP 2009-00005, LRP 2009-0006].

The following text was inserted as the third paragraph of Metro Plan Chapter I, Introduction Purpose Section on Page I-1:

> *"In order to achieve timely compliance with their statutory obligations under 2007 Or Laws Chapter 650, the cities of Eugene and Springfield and Lane County adopt the following forecasts for their respective jurisdictional areas:*

	2030	*2035*
Eugene - City Only	*194,314*	*202,565*
Urban Transition Area West of I-5	*17,469*	*16,494*
Total	*211,783*	*219,059*
Springfield – City Only	*74,814*	*78,413*
Urban Transition Area East of I-5	*6,794*	*6,415*
Total	*81,608*	*84,828"*

The 2030 Plan Urbanization Element, page 31 includes the adopted forecast:

	2030	2031	2032	2033	2034	2035
Springfield – City Only	74,814	75,534	76,254	76,974	77,693	78,413
Metro Urban Area East of I-5	6,794	6,718	6,642	6,567	6,491	6,415
Total	81,608	82,252	82,896	83,541	84,184	84,828

Conclusion OAR 660-024-0030. A coordinated population forecast for year 2030 of 81,608 for the City of Springfield and the Metro area east of I-5 was adopted into the comprehensive plan[122] by Lane County, Springfield, and Eugene and acknowledged by the State. The forecast effectively provided coordinated projections for years ending 2030 through 2035 that were used as the basis for the Springfield 2030 planning purposes and plan policies adopted to meet residential and employment land needs for the 20-year planning period 2010-2030.

As explained in the City's findings under Goal 9 (pages 46-47 of this report) and in the CIBL/EOA Appendix C Employment Forecast[123], The 2030 UGB amendment relied on the 2006 employment forecast [124]of 13,440 new employees for Springfield in the year 2030 to project employment land needs.

OAR 660-024-0040 20 Year Land Need Determinations

OAR 660-024-0040(1)

> *"The UGB must be based on the adopted 20-year population forecast for the urban area described in OAR 660-024-0030, and must provide for needed housing, employment and other urban uses such as public facilities, streets and roads, schools, parks and open space over the 20-year planning period consistent with the land need requirements of Goal 14 and this rule. The 20-year need determinations are estimates which, although based on the best available information and methodologies, should not be held to an unreasonably high level of precision."*

2030 Plan coordination of forecast land needs for 2010-2030 planning period. Springfield's existing UGB is based on the adopted 2010-2030 population forecast for the urban area described in OAR 660-024-0030, and provides for needed housing land uses over the 20-year planning period consistent with the land need requirements of Goal 14 and this rule. [OAR 660-024-0040(1)] As previously stated in the City's findings under Goal 9, the subject UGB amendment amends the UGB in consideration of employment land, public facilities, parks and open space needs for the same 2010-2030 planning period. Springfield chose to conduct concurrent land inventories and analyses to evaluate the capacity of its

[122] Metro Plan p. I-2; Springfield Residential Land and Housing Needs Analysis, Table 5-1: 2010-2030 population growth equates to a 1% AAGR for the Springfield UGB.
[123] ECONorthwest, CIBL/EOA, pages 153-158
[124] The employment forecast in the adopted Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis, Appendix C.

UGB for housing needs and commercial/industrial land needs. Springfield began the Residential Land Study (RLS) in 2007 and the Commercial and Industrial Buildable Lands Study (CIBL) in 2008. Springfield chose to take actions in response to the simultaneous evaluations separately in order to meet the City's obligation under ORS 197.304 to adopt a separate Springfield UGB to meet it housing needs in a timely manner.

Springfield previously reviewed its UGB in consideration of one category of land need – housing. Springfield's acknowledged comprehensive plan (the Metro Plan) was amended to address Springfield's land need for housing and residential purposes for the planning period 2010-2030. Springfield has demonstrated that its acknowledged Urban Growth Boundary, comprehensive plan Residential Land Use and Housing Element policies and implementation actions will provide sufficient buildable lands for residential purposes within the urban growth boundary established pursuant to statewide planning goals to accommodate estimated housing needs for the 2010-2030 planning period. [Springfield Ordinance 6268 adopted June 20, 2011, and Lane County PA1274, acknowledged July 25, 2011 (DLCD File Number 009-09)] The subject 2030 Plan amendments were closely coordinated with Springfield's previously acknowledged comprehensive planning actions addressing Goal 10 and do not alter Springfield's existing acknowledged comprehensive plan designations, policies or land use regulations addressing housing needs for 2010-2030.[125]

Springfield Ordinance 6268 and Lane County Ordinance PA1274 identified a deficit of 300 acres to meet 2010-2030 public land, parks and open space needs. The subject UGB amendment partially addresses this category of land need — as explained in the City's findings under Goals 8 and 11 — by adding existing public parks, open space and public facilities to accommodate parks, open space and public facilities needs within the UGB and Metro Plan boundary. Inclusion of these lands (approximately 455 acres) within the Springfield UGB and Metro plan boundary enables and facilitates coordination and management of facilities /land use/transportation planning under consistent plan policies and land use regulations.

Conclusion OAR 660-024-0040(1). The 2030 Plan amendments amend the UGB to provide for employment and other uses including public facilities, streets and roads, parks and open space over the 2010-2030 planning period. The 2030 Plan UGB amendment, plan policies, plan designations and land use regulations implement Goal 14 Urbanization by providing urbanizable[126] land in the Springfield UGB

[125] Springfield was able to accommodate its 20-year residential growth needs without expanding the UGB. The City was able to meet its housing needs through redesignation of land in its Glenwood Nodal Development / MMS areas to meet the identified HDR deficit. The City adopted land use efficiency measures into the Springfield Development Code (Ordinance 6286) including 8 du/acre minimum density in the LDR zone, SLR small lot residential zone (3000 sq. ft. min lot size, etc.). Lands designated for residential uses are needed to meet forecast 2010-2030 residential land needs and thus cannot be redesignated to meet employment needs. Existing Mixed-use plan designations, zoning and the City's 2030 Comprehensive Plan policies require and support mixed-use development to meet Springfield's identified needs for multi-family housing.

[126] Goal 14: *"**Urbanizable Land.** Land within urban growth boundaries shall be considered available for urban development consistent with plans for the provision of urban facilities and services. Comprehensive*

designated for urban development needs — based on a demonstrated need for employment opportunities, livability, public facilities, parks and open space for the planning period 2010-2030.

OAR 660-024-0040(2) Establishment of 2010-2030 Planning Period

> *"If the UGB analysis or amendment is conducted as part of a periodic review work program, the 20-year planning period must commence on the date initially scheduled for completion of the appropriate work task. If the UGB analysis or amendment is conducted as a post-acknowledgement plan amendment under ORS 197.610 to 197.625, the 20-year planning period must commence either:*
>
> *(a) On the date initially scheduled for final adoption of the amendment specified by the local government in the initial notice of the amendment required by OAR 660-018-0020;"*

The 2010-2030 planning period was established to commence on the 2010 date initially scheduled for final adoption of the amendment as stated in the City's submittal ["Overview," document, page 2, submitted to DLCD December 31, 2009].[127] The 2010-2030 planning period is based on the beginning of the 20-year period specified in the coordinated population forecast for the urban area adopted by the city and county pursuant to OAR 660-024-0030 and the date initially scheduled for final adoption.

In 2010, a 20 year population forecast for the Springfield urban area was adopted into the Metro Plan [page I-2] for year 2030.

Springfield's UGB analysis and 2030 Plan amendment is not part of periodic review work program. Springfield's proposal is essentially a PAPA of the Eugene-Springfield Metro Plan that is "reviewed in the manner of periodic review" because it includes an amendment of the UGB. The study was initiated to meet the City's obligation to establish a separate UGB from Eugene, in response to ORS 197.304, adopted into law in 2007:

ORS 197.304 Lane County accommodation of needed housing

> *(1) Notwithstanding an intergovernmental agreement pursuant to ORS 190.003 (Definitions for ORS 190.003 to 190.130) to 190.130 (Effect of ORS 190.125) or*

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plans and implementing measures shall manage the use and division of urbanizable land to maintain its potential for planned urban development until appropriate public facilities and services are available or planned. [OAR 660-015-0000(14)]

[127] The initial notice of the amendment was submitted on December 31, 2009, more than 20 days before the date of the first evidentiary hearing date of February 17, 2010, consistent with ORS 197.610 (1). The proposed 2030 Plan Metro Plan amendments (including residential, employment and urbanization elements and a proposal to expand the UGB) were the subject of the initial evidentiary hearing — conducted by the Springfield and Lane County Planning Commissions on February 17, 2010.

acknowledged comprehensive plan provisions to the contrary, a city within Lane County that has a population of 50,000 or more within its boundaries shall meet its obligation under ORS 197.295 (Definitions for ORS 197.295 to 197.314 and 197.475 to 197.490) to 197.314 (Required siting of manufactured homes) separately from any other city within Lane County. The city shall, separately from any other city:

(a) Establish an urban growth boundary, consistent with the jurisdictional area of responsibility specified in the acknowledged comprehensive plan; and

(b) Demonstrate, as required by ORS 197.296 (Factors to establish sufficiency of buildable lands within urban growth boundary), that its comprehensive plan provides sufficient buildable lands within an urban growth boundary established pursuant to statewide planning goals to accommodate estimated housing needs for 20 years.

(2) Except as provided in subsection (1) of this section, this section does not alter or affect an intergovernmental agreement pursuant to ORS 190.003 (Definitions for ORS 190.003 to 190.130) to 190.130 (Effect of ORS 190.125) or acknowledged comprehensive plan provisions adopted by Lane County or local governments in Lane County. [2007 c.650 §2]

[1] *"Sec.3 A local government that is subject to section 2 of this 2007 Act [197.304] shall complete the inventory, analysis and determination required under ORS 197.296(3) to begin compliance with section 2 of this 2007 Act within two years after the effective date of this 2007 Act [January 1, 2008]"* (emphasis added)

The City commenced the Springfield 2030 Plan's planning period on year 2010 to 1) mesh seamlessly with the County's adopted coordinated population forecast period; to meet the City's obligation to complete the housing inventory, analysis and determination before January 1, 2010, and 3) to closely coordinate Springfield's residential and commercial/ industrial land inventories and analyses processes that would serve as the factual bases for the Springfield UGB and respective Springfield 2030 Comprehensive Plan policy elements.

The planning period 2010-2030 complies with OAR 660-024-0040(2)(a)and(b).

Conclusion OAR 660-024-0040(2). The 2010-2030 planning period is based on the beginning of the 20-year period specified in the coordinated population forecast for the urban area adopted by the city and county pursuant to OAR 660-024-0030 and the date initially scheduled for final adoption.

OAR 660-024-0040(3) Amending the UGB to Meet Employment, Public Land, Parks and Open Space Needs

"(3) A local government may review and amend the UGB in consideration of one category of land need (for example, housing need) without a simultaneous review and

amendment in consideration of other categories of land need (for example, employment need)."

The City and Lane County request approval of Springfield's review of the UGB in consideration of employment land need as explained in these findings and in response to the employment land need determination and factual basis contained in Ordinance Exhibit B-2: 2030 Plan Economic Element Technical Supplement CIBL/EOA Final Report 2015. The City and Lane County request approval of Springfield's UGB amendment adding approximately 257 acres of land designated "Urban Holding Area-Employment" to accommodate the identified need of at least 223 suitable acres for employment purposes.

The City and Lane County request approval of Springfield's review of the UGB in consideration of public facilities, parks and open space needs as explained in these findings and in response to the factual basis contained in Ordinance 6268, the Willamalane Parks and Recreation District need assessment and Comprehensive Plan (previously adopted as a refinement of the Metro Plan), the Metro Area Public Facilities and Services Plan, and Springfield Utility Board facilities plans. The City and Lane County request approval of Springfield's UGB amendment adding approximately 455 acres of land designated "Public/Semi-public."

Conclusion: OAR 660-024-0040(3). As previously stated in the City's findings under Goal 9, the City is amending the UGB in consideration of employment land needs. The 2030 Plan amendments also amend the UGB to provide public facilities, streets and roads, parks and open space over the 2010-2030 planning period.

OAR 660-024-0040(5) Determination of 20-Year Employment Land Need

"Except for a metropolitan service district described in ORS 197.015(13), the determination of 20-year employment land need for an urban area must comply with applicable requirements of Goal 9 and OAR chapter 660, division 9, and must include a determination of the need for a short-term supply of land for employment uses consistent with OAR 660-009-0025. Employment land need may be based on an estimate of job growth over the planning period; local government must provide a reasonable justification for the job growth estimate but Goal 14 does not require that job growth estimates necessarily be proportional to population growth."

Applicable requirements of Goal 9 and OAR Chapter 660, division 9 relating to determination of 20-year employment land need are focused on development and adoption of an Economic Opportunities Analysis (OAR 660-009-0015). As discussed under Goal 9 above, the City of Springfield has adopted an Economic Opportunities Analysis consistent with OAR 660-009-0015 requirements, including:

1) A trends analysis (CIBL/EOA Chapter 3, Economic Trends and Factors Affecting Future Economic Growth in Springfield);

2) Identification of long term and short term employment site needs (CIBL/EOA Chapter 4, Land Demand and Site Needs in Springfield, and Chapter 2, pp. 40-41 Analysis of Short Term Supply of Land);
3) Suitable lands inventory (EOA Chapter 2, Land Available for Industrial and Other Employment Uses); and
4) An assessment of community economic development potential (CIBL/EOA Chapters 3 & 4).

As explained in detail in Appendix C to the CIBL/EOA (Employment Forecast and Site Needs for Industrial and other Employment Needs), employment land need identified in the EOA is based on forecast employment growth over the planning period (13,440 new jobs through 2030).[128] Springfield's population is forecast to reach 81,608 by 2030.[129]

The results of the CIBL/EOA (Table 5-4 Employment site and land needs, Springfield UGB 2010-2030) indicate that Springfield's proposed current UGB does not provide sufficient land to meet Springfield's employment needs and economic development objectives, therefore Springfield must 1. adopt amendments to the comprehensive plan to address deficiencies; and 2. expand the UGB to provide suitable, serviceable land that can be designated to provide the appropriate site characteristics to meet the needs of target industries. Springfield has a land need for seven sites larger than 5 acres, including 3 sites larger than 20 acres (2 industrial sites 20 acres and larger; 1 commercial and mixed-use site 20 acres; and 4 commercial and mixed-use sites 5-20 acres in size).

Conclusions: OAR 660-024-0040(5). As demonstrated in the City's findings under Goal 9, Springfield's 20-year employment land need has been established in accordance with the applicable requirements of Goal 9 and OAR chapter 660, division 9, including a determination of the need for a short-term supply of land for employment uses consistent with 660-009-0025. The 2030 UGB uses the 2006 employment forecast of 13,440 new employees for Springfield in the year 2030 to project employment land needs, consistent with OAR 660-024-0040(5). The CIBL/EOA provides a reasonable justification for the job growth estimate, based on substantial evidence.

After accounting for available land supply and the results of efficiency measures, **Table 5-4 of the CIBL/EOA identifies employment needs that require expansion of the UGB as follows: Commercial and Mixed-Use** (**Land Need = 5 sites, 97 acres**). After accounting for vacant, partially-vacant and potentially redevelopable commercial and mixed use land supply within the UGB, there is an unmet need for 5 commercial and mixed-use sites totaling an estimated 97 acres.

Industrial (Land Need = 2 sites, 126 acres). After accounting for vacant, partially-vacant and potentially redevelopable industrial land supply within the UGB, unmet industrial need is identified as 2 large sites, totaling an estimated 126 acres.

The total employment land needed in the UGB expansion to meet site needs is 223 suitable acres:

[128] CIBL/EOA Appendix C, p. 153-156.
[129] Table 5-1, *Springfield Residential Land and Housing Needs Analysis*. 2010-2030 population growth equates to a 1% AAGR for the Springfield UGB.

3 sites larger than 20 acres and 4 sites 5-20 acres.

OAR 660-024-0040(7) Determination of 20-year land needs for transportation and public facilities

> *"The determination of 20-year land needs for transportation and public facilities for an urban area must comply with applicable requirements of Goals 11 and 12, rules in OAR chapter 660, divisions 11 and 12, and public facilities requirements in ORS 197.712 and 197.768. The determination of school facility needs must also comply with ORS 195.110 and 197.296 for local governments specified in those statutes."*

The City's findings under Goals 11, 12 and OAR 660-024-0060 explain how 20-year land needs for transportation and public facilities were addressed in the 2030 Plan amendments to demonstrate continued compliance with applicable requirements of Goals 11 and 12, rules in OAR chapter 660, divisions 11 and 12, and public facilities requirements in ORS 197.712 and 197.768. The 2030 Plan amendments also amend the UGB and Metro Plan Boundary to include existing publicly-owned lands that accommodate public water system well fields and water treatment facilities and Willamalane Park and Recreation District parks and open space facilities, based on previously acknowledged need determinations.[130] These public uses are location-specific and cannot be accommodated on other land already inside the urban growth boundary.

Determination of lands needed for public facilities, parks and open space is established in the Metro Public Facilities and Services Plan, Springfield water, wastewater and stormwater facilities plans, and the Willamalane Park and Recreation District Comprehensive Plan. An unmet 300-acre deficit of public/semi-public land to meet park and recreation needs was previously identified in the Springfield RLHNA.

School facility needs were previously addressed in the acknowledged Residential Land and Housing Needs Analysis and existing UGB and are not addressed in the subject 2030 Plan amendments.[131]

<u>Conclusions: OAR 660-024-0040(7).</u> The City provided substantial evidence to explain how the 2030 Plan amendments coordinate land use, transportation and public facilities planning to address applicable requirements of Goals 11 and 12, rules in OAR chapter 660, divisions 11 and 12, and public facilities requirements in ORS 197.712 and 197.768.

The City's findings under Goals 8 and 11 provide reasonable justification for the **City and Lane County's policy choice to include approximately 455 acres of existing public parks, open space and water system public facilities in the amended Springfield UGB and Metro Plan boundary**, based on previously

[130] *Willamalane Parks and Recreation Comprehensive Plan* and *Eugene-Springfield Metropolitan Area Public facilities and Services Plan*

[131] *Springfield Public Schools Administrative Facilities Plan*, January 1, 2010 "provides up-to-date data related to school district facilities, sites and enrollment and provides information to update our 2006 Facilities Plan. This report addresses the items laid out in ORS 195.110 requiring school facilities plans for large school districts."

acknowledged need determinations.[132] These public uses are location-specific and cannot be accommodated on other land already inside the urban growth boundary.

OAR 660-024-0040(9) Use of safe harbor: OED Employment forecast

> *"The following safe harbors may be applied by a local government to determine its employment needs for purposes of a UGB amendment under this rule, Goal 9, OAR chapter 660, division 9, Goal 14 and, if applicable, ORS 197.296.*
>
> *(a) A local government may estimate that the current number of jobs in the urban area will grow during the 20-year planning period at a rate equal to either:*
>
> *(A) The county or regional job growth rate provided in the most recent forecast published by the Oregon Employment Department; or"*

As stated in the CIBL/EOA page 156, OAR 660-024-0040(9)(a)(A) allows the City to determine employment land needs based on the county or regional job growth rate provided in the most recent forecast published by the Oregon Employment Department:

> *"Springfield is part of Region 5, which includes all of Lane County. Based on this safe harbor, employment in Springfield can be assumed to grow at 1.4% annually. Table C-2 shows the result of applying this growth rate to the total employment base of 41,133 in Springfield. Table C-2 shows that employment is forecast to grow by 13,440 employees (a 32% increase) between 2010 and 2030."*

Table C-2. Forecast of employment growth in Springfield's UGB, 2010–2040

Year	Total Employment
2008	41,133
2010	42,284
2030	55,724
2030	55,724
2031	56,498
2032	57,283
2033	58,079
2034	58,886
2035	59,704
2036	60,534
2037	61,375
2038	62,228
2039	63,093
2040	63,970
Change 2010 to 2030	
Employees	13,440
Percent	32%
AAGR	1.4%

Source: ECONorthwest

[132] *Willamalane Parks and Recreation Comprehensive Plan* and *Eugene-Springfield Metropolitan Area Public Facilities and Services Plan*

Conclusion: OAR 660-024-0040(9). The CIBL/EOA employment land need determination for the 2010-2030 planning period was based on the best available information and accepted methodologies, including an employment forecast based on the county or regional job growth rate provided by the Oregon Employment Department, as allowed under OAR 660-024-0040(9)(a)(A).

Conclusion: OAR 660-024-0040. The CIBL/EOA employment land need determination was conducted concurrently with Springfield's (previously acknowledged) Residential Land Use and Housing Needs Analysis need determination for the same 2010-2030 planning period. Thus, the employment forecast and land need determination were coordinated[133] in response to the new split of the Metro Plan UGB between Springfield and Eugene; and to Springfield's policy decision to increase opportunities for employment to residents in the city over time while supporting Regional Economic Prosperity plan goals.

Throughout the multi-year public process, questions and assertions have been raised suggesting that the City's CIBL/EOA relies on "stale" information because the City has not updated the employment forecast or inventory data used in the analysis (since July 2008), and thus has not utilized the most current available information as the factual basis for the conclusions reached. Similar contentions of error were made by opponents of the Scappoose UGB decision. As stated in the Court of Appeals legal opinion for that case, such assertions were dismissed by LCDC: *"the choice between conflicting evidence is the city's. The appellants have not established and the commission does not find that a reasonable person could not have relied on the employment data the city used."*[134] In the Scappoose decision, the commission concluded that newer information submitted would not *"require the city to undertake multiple, shifting iterations of the same analysis as it moves through the planning and adoption process."*

The City respectfully considered all information presented throughout the multi-year planning process (2008-2016) and reasoned that none of the challenges to the Springfield inventory, analysis methodologies used, or conclusions reached would make it unreasonable for the City to rely on the employment and inventory data in the record that formed the basis of its CIBL/EOA. The City asserts that the inventory and analysis contained in the CIBL/EOA appropriately represents a "snapshot in time;" was coordinated with the County's population forecast for the 20-year period commencing on the date commencing on the date initially scheduled for final adoption of the amendment specified by the local government in the initial notice of the amendment required by OAR 660-018-0020; was prepared in full compliance with Oregon law and the applicable administrative rule; and utilized the county or regional job growth rate provided in the most recent forecast published by the Oregon Employment Department at the time the CIBL/EOA was prepared, as specifically allowed under the safe harbor provided under OAR 660-024-0040(9)(a)(A). The data base used to prepare the CIBL/EOA is the

[133] Metro Plan p. I-2. A year 2030 population forecast of 81,608 for the City of Springfield and the Metro area east of I-5 was adopted into the comprehensive plan by Springfield, Eugene and Lane County "in order to achieve timely compliance with the statutory obligations under ORS 197.304" and acknowledged by the State as the coordinated population basis for Springfield's 2030 Comprehensive Plan. [OAR 660-024-0030(1)]

[134] Zimmerman v. LCDC and City of Scappoose, LCDC 13UGB0001829; A153856, p. 524-525 (2014)

best available information at the time of CIBL/EOA preparation (2008-2009) — the pre-hearing formulation of the economic opportunities analysis developed in conjunction with the community visioning process and citizen involvement activities as fully documented in the local record. The employment land assumptions made and conclusions reached in the CIBL/EOA and the city's policy choices in response to that land inventory and analysis were reasonable and are supported by substantial evidence in the whole record.

OAR 660-024-0050(1) Land Inventory and Response to Deficiency

> *"When evaluating or amending a UGB, a local government must inventory land inside the UGB to determine whether there is adequate development capacity to accommodate 20-year needs determined in OAR 660-024-0040…For employment land, the inventory must include suitable vacant and developed land designated for industrial or other employment use, and must be conducted in accordance with OAR 660-009-0015."*

Conclusion OAR 660-024-0050(1): The City's findings under Goal 9, OAR 660-009-0015(3) Inventory of Industrial and Other Employment Lands (pages 53-59 of this report); OAR 660-009-0025(1) Identification of Needed Sites (pages 96-101) and under Goal 14 (pages 117-125 of this report) explain how Springfield inventoried land inside the UGB — including potentially redevelopable sites — in accordance with OAR 660-009-0015 to determine that there is not adequate development capacity to accommodate 20-year employment land needs determined in OAR 660-024-0040.[135]

OAR 660-024-0050(3) Inventory of vacant land

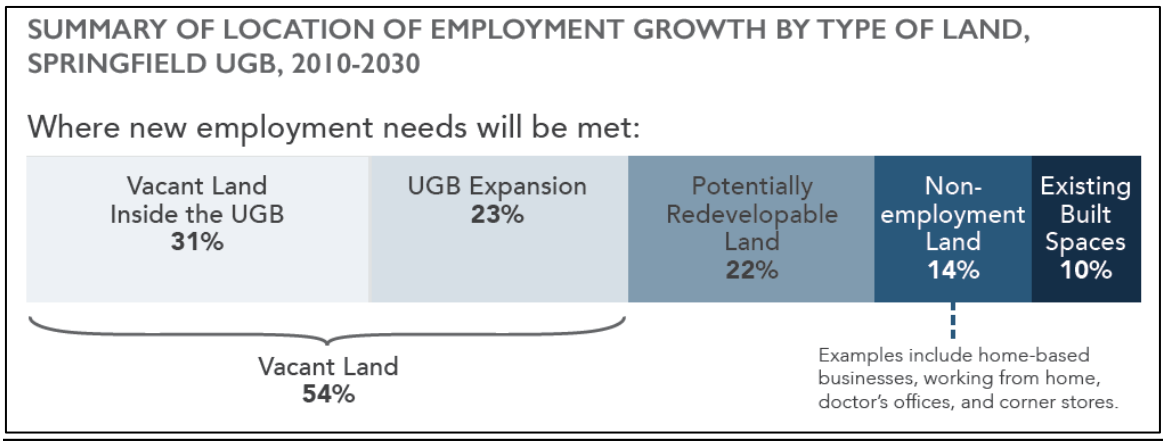
> *"As safe harbors when inventorying land to accommodate industrial and other employment needs, a local government may assume that a lot or parcel is vacant if it is:*
>
> *(a) Equal to or larger than one-half acre, if the lot or parcel does not contain a permanent building; or*
>
> *(b) Equal to or larger than five acres, if less than one-half acre of the lot or parcel is occupied by a permanent building."*

The City did not choose to use the safe harbor. The City's findings under Goal 9, OAR 660-009-0005, (pp. 30-31), and OAR 660-009-0015(3)(a)(B) (p. 57) explain how the CIBL/EOA defined vacant land. "Vacant" is defined in Chapter 2 of the CIBL/EOA as follows:

> *"Tax lots that have no structures or have buildings with very little value. For the purposes of this inventory, lands with improvement values under $10,000 (2008 Lane County Assessment and Taxation Data) are considered vacant (not including lands that are identified as having mobile homes)." This definition of "vacant" is more inclusive that what OAR 600-009-0005(14) requires, with the result that Springfield's inventory*

[135] See Exhibit F-1 Supplemental Findings for more discussion of the CIBL inventory, land classifications, and redevelopment analysis.

includes more available land in the inventory than it would if the OAR600-009-0005(14) definition is used."



Based on the inventory, the City's CIBL/EOA and 2030 Plan assumes that 31% of forecast employment will be met on vacant land within the existing UGB. CIBL/EOA Maps 2-3, 2-4 and 2-5 p. 24-26 show where these lands are located and where sites with absolute development constraints were deducted from the inventory.

Conclusion OAR 660-024-0050(3): The Springfield CIBL/EOA used a definition of "vacant" that is more inclusive that what OAR 600-009-0005(14) requires, with the result that Springfield's inventory includes more available land in the inventory than it would if the OAR600-009-0005(14) definition is used. 31% of forecast employment will be met on vacant land within the existing UGB.[136]

OAR 660-024-0050(4) amending the comprehensive plan to satisfy the need deficiency, either by increasing the development capacity of land already inside the city or by expanding the UGB, or both

"If the inventory demonstrates that the development capacity of land inside the UGB is inadequate to accommodate the estimated 20-year needs determined under OAR 660-024-0040, the local government must amend the plan to satisfy the need deficiency, either by increasing the development capacity of land already inside the city or by expanding the UGB, or both, and in accordance with ORS 197.296 where applicable. Prior to expanding the UGB, a local government must demonstrate that the estimated needs cannot reasonably be accommodated on land already inside the UGB. If the local government determines there is a need to expand the UGB, changes to the UGB must be

[136] See Exhibit F-1 Supplemental Findings p. 35-43 for more discussion of the CIBL inventory, land classifications, and redevelopment analysis. CIBL/EOA Table 2-8 shows that the City's analysis classified 41.4 total acres in lots less than 0.5 acres, including 29.3 unconstrained acres. Under the rule definition, those sites would not have been considered vacant.

determined by evaluating alternative boundary locations consistent with Goal 14 and OAR 660-024-0060."

As explained on pages 53-58 and in pp. 33-62 of this report, the CIBL/EOA inventory is consistent with OAR 660-009-0015.

OAR 660-024-0050(4) is addressed on pages 119-125 of this report. The City's findings under Goal 9[137] provide explanation of policies, implementation measures, plan designations and zoning adopted by the City and Lane County to address identified land needs.

Buildable lands. Springfield has 3,414 acres that are designated for industrial and other employment use. About two-thirds of the land designated for employment within Springfield's UGB is considered developed and is not expected to redevelop over the 20 year planning period. Less than 15% of this land is buildable, unconstrained land. The majority of buildable, unconstrained employment land in Springfield has existing development on it that is expected to redevelop over the planning period. Springfield has a lack of buildable large sites, with one buildable site 20 acres and larger and 22 buildable sites in the five to 20 acre size range.[138],[139]

Redevelopment potential. The analysis of potentially redevelopable land and need for employment land assumes that Springfield will have substantial redevelopment over the planning period. The analysis of potentially redevelopable land assumes that the employment capacity of redeveloped areas will increase, not simply that a new building will replace an old building. Consistent with City Council policies, the areas that are expected to have the most redevelopment are in Glenwood, especially along the Willamette Riverfront and Franklin/McVay corridor, and in the Downtown Urban Renewal District.[140]

The Glenwood and Downtown redevelopment areas that are expected to have the most redevelopment are currently designated and zoned to require Mixed-use Nodal Development. The Glenwood Riverfront and Franklin/McVay corridor has been designated as a Mixed-use Multi-modal Area (MMA) pursuant to the Goal 12 administrative rule. Employment in these areas is currently served or is planned to be served by the region's Frequent Transit Network. The City's allocation of employment growth to land designated and zoned to require Mixed-use Nodal Development contributes to the region's commitments to implement Transportation Planning Rule Alternative Performance Measures to reduce reliance on automobiles and Vehicle Miles Travelled (VMT).

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[137] See City's findings under OAR 660-009-0020(1)(a), (b), (c), OAR 660-009-0025(3), OAR 660-009-0020(2), OAR 660-009-0020(3), OAR 660-009-0020(4), OAR 660-009-0020(5), OAR 660-009-0020(6), OAR 660-009-0025(8), OAR 660-009-0020(7), OAR 660-009-0025, OAR 660-009-0025(1), OAR 660-009-0025(3), OAR 660-009-0025(6) pages 63-116 of this report.

[138] CIBL/EOA, p. 95-96

[139] See Exhibit F-1 Supplemental Findings p. 35-43 for more discussion of the CIBL inventory, land classifications, and redevelopment analysis.

[140] CIBL/EOA, p. 95-96

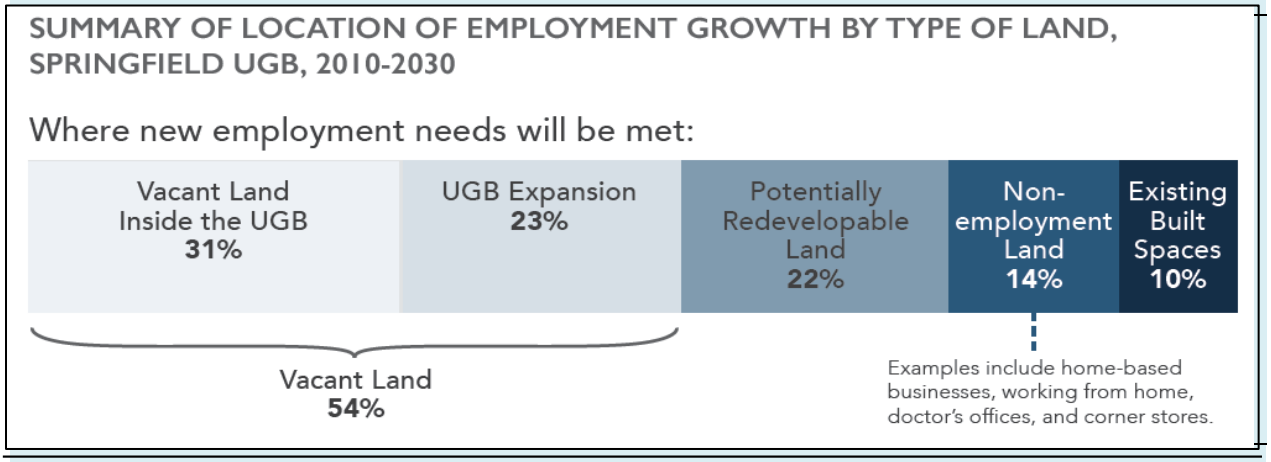
The CIBL/EOA pages 33-38 provides a site-by-site evaluation of "Potentially Redevelopable" sites within the existing UGB that are larger than 5 acre[141]s. That analysis assumed that 1 needed site larger than 20 acres and 6 needed sites 5-20 acres in size could be accommodated without expanding of the UGB.

Springfield's CIBL/EOA assumes the City will be able to meet all employment land needs on sites five acres and smaller within the existing UGB, through redevelopment, infill development, and employment uses on non-employment land (e.g., home occupations).

Conclusions OAR 660-024-0050(4): The City conducted a thorough commercial and industrial lands inventory in accordance with OAR 660-009-0015.

OAR 660-024-0050(4) is addressed on pages 119-125 of this report.

The City's findings explain how development capacity inside the UGB was determined, and how the CIBL/EOA assumed that 77% of forecast employment would be accommodated within the existing UGB.



The City and Lane County adopted the inventory into the comprehensive plan (Ordinance Exhibit B-2, CIBL/EOA).

The City and Lane County adopted 2030 Plan Economic Element and Urbanization Element comprehensive plan policies — as described in pages 66-77 of this report — effectively providing land use controls to manage the land supply efficiently in support of these assumptions.

Prior to expanding the UGB, the City demonstrated that the need for larger employment sites cannot reasonably be accommodated on land already inside the UGB.

23% of forecast employment requires expansion of the UGB to provide suitable sites.

The CIBL/EOA demonstrates that the development capacity of land inside the UGB is inadequate to accommodate the estimated 20-year land needs for larger industrial and commercial mixed use sites to

[141] Explained on page 68 -69 of this report

provide sites for the City's target industry employers that require sites larger than 5 acres, including three sites larger than 20 acres.

Springfield determined there is a need to expand the UGB.

The 2030 Plan amendment expands the UGB to provide 257 acres of land designated for large site employment use to meet the deficit of 223 suitable acres.

Changes to the UGB must be determined by evaluating alternative boundary locations consistent with Goal 14 and OAR 660-024-0060.

OAR 660-024-0050(5) Difference between the estimated 20-year needs determined under OAR 660-024-0040 and the amount of land and development capacity added to the UGB

> *(5) "In evaluating an amendment of a UGB submitted under ORS 197.626, the director or the Commission may determine that a difference between the estimated 20-year needs determined under OAR 660-024-0040 and the amount of land and development capacity added to the UGB by the submitted amendment is unlikely to significantly affect land supply or resource land protection, and as a result, may determine that the proposed amendment complies with section (4) of this rule."*

34-acre difference between the estimated 20-year needs determined under OAR 660-024-0040 and the amount of land and development capacity added to the UGB by the submitted amendment. The employment land UGB amendment UGB includes a total of 273 gross acres, including right of way and portions of parcels with development constraints. 2030 Urbanization Element, page 11, Table 2 provides the following summary:

Table 2: Urbanizable Land Designated Urban Holding Area – Employment (UHA-E)

Name of Area	Acres Designated UHA-E	Acres Zoned AG	# of Suitable employment acres (UHA-E)	Location
North Gateway UHA -E	139.4 gross acres (includes right of way)	193	132.1 suitable acres	North of Gateway/International Way, east of I-5
Mill Race District UHA-E	133 gross acres (includes right of way)	135	125 suitable acres	South of Main Street, via South 28th and M Streets

The employment land UGB amendment adds approximately 257 acres of land designated for employment (UHA-E) to provide at least 223 suitable acres to meet the 20-year employment site needs deficit, an overall difference of 34 acres. The 34-acre difference between the estimated 20-year needs determined under OAR 660-024-0040 and the amount of land and development capacity added to the

UGB by the submitted amendment is unlikely to significantly affect land supply or resource land protection. The City and Lane County request the Director and Commission to approve the UGB as proposed.

The employment land UGB amendment includes a total of 132.2 unconstrained acres in the North Gateway UGB expansion area. The employment land UGB amendment includes a total of 125 unconstrained acres in the Mill Race UGB expansion area. The employment land UGB amendment includes "extra" land in the Mill Race UGB expansion area, pushing the total acres of land included to exceed the needed total of 223 suitable acres. Two ownerships (SUB and John) encompass 78.2 unconstrained acres in the Mill Race UGB expansion area. The City assumes that the 12.7 balance of the 223 acre land need would be met on a combination of the smaller parcels located south of the three large parcels, as shown in the map on the following page. One ownership (Reynolds) comprises 19.2 unconstrained acres. The Bales and Booth ownerships comprise at least 5 unconstrained acres. The City reasoned that including all of the parcels in the Mill Race UGB expansion area is reasonable, fair and justified as follows:

As shown in the map on the following page[142], 10 of the 14 smaller parcels are located along existing South 28th, South M, and South 26th streets and right of way that currently provide access to the area and that would likely provide future access and services to the suitable large parcels owned by Johnson and Springfield Utility Board. Thus, including the smaller parcels in the UGB would support efficient and adequate provision of services to the 57-acre and 21-acre sites as the area is planned and developed for urban employment uses.

As shown in the map on the following page, leaving any of the smaller parcels (indicated with a white star) outside of the UGB would result in inefficient "island" of County-administered land use planning; would leave a potentially awkward and confusing "donut hole in the donut" of the Metro Plan Boundary and a somewhat odd configuration of the Lane Rural Comprehensive Plan boundary. In earlier work sessions, County Commissioners and City Councilors requested staff to seek UGB solutions that do not leave County-administered lands between the river the expanded UGB and Metro Plan boundary where possible. The full Mill Race map is included at Ordinance Exhibit A.

As shown in the map on the following page, the Mill Race UGB expansion area includes four waterways. These features are identified and discussed in the City's findings under Goal 5. "Riparian resources areas" are identified in the City's CIBL/EOA as an absolute development constraint. Riparian area buffers, as required in the Springfield Development Code, were deducted from the calculation of "unconstrained acres." If the City is required to increase buffer requirements in response to pending future federal or state legislation, the "extra" acres included in the Mill Race UGB expansion may be needed to accommodate a portion of the 223-acre overall employment land need should the City's calculation of "unconstrained" acres in the Mill Race area be adversely affected. Thus, the Director and Commission's approval of the UGB as proposed will enable balancing of employment needs with

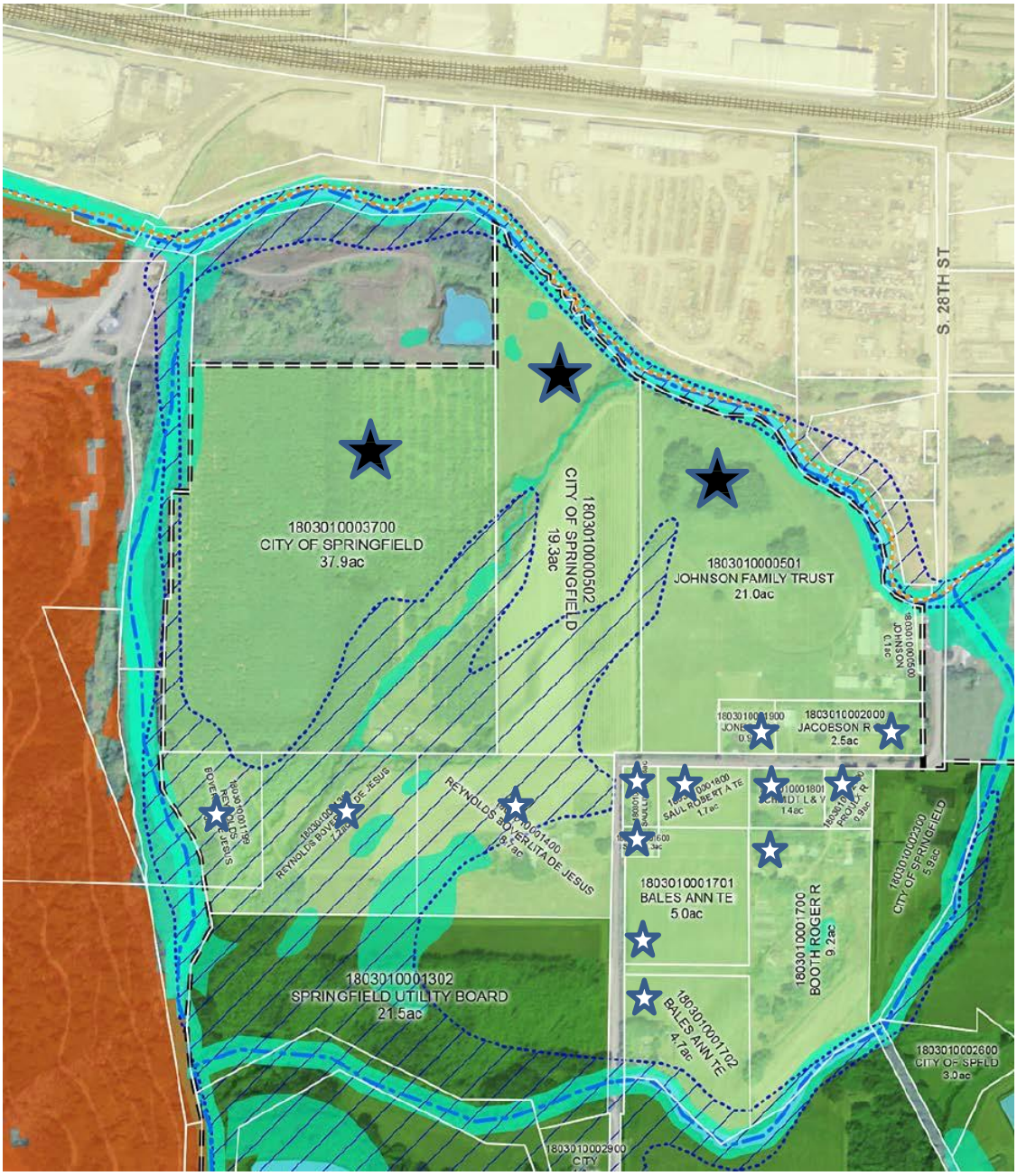
[142] Ordinance Exhibit A Map: "Proposed UGB Expansion Area – Mill Race"

resource protection needs consistent with Goal 14, as allowed under OAR 660-024-0050(5) and consistent with the City's 2030 Urbanization Element Goal UG-3:

> ***"Provide an adequate level of urban services, including but not limited to public water, wastewater, and stormwater management systems, environmental services and an urban multi-modal transportation system as urban development occurs within the Springfield UGB."***

and 2030 Urbanization Element Goal UG-4:

> ***"As the City grows and as land develops, maintain and reinforce Springfield's identity as a river-oriented community by emphasizing and strengthening physical connections between people and nature in the City's land development patterns and infrastructure design."***



Suitable large parcels Mill Race UGB Expansion Area

Smaller parcels included in the UGB expansion

Conclusion OAR 660-024-0050(5). The City explained its rationale for including 34 "extra" acres of suitable land in excess of the 223-acre 20-year land it added to the UGB and requests approval of its choice.

OAR 660-024-0050(6)

"When land is added to the UGB, the local government must assign appropriate urban plan designations to the added land, consistent with the need determination. The local government must also apply appropriate zoning to the added land consistent with the plan designation or may maintain the land as urbanizable land until the land is rezoned for the planned urban uses, either by retaining the zoning that was assigned prior to inclusion in the boundary or by applying other interim zoning that maintains the land's potential for planned urban development. The requirements of ORS 197.296 regarding planning and zoning also apply when local governments specified in that statute add land to the UGB."

Ordinance Exhibit A-2 Maps illustrate the appropriate urban plan designations Springfield and Lane County assigned to lands added to the UGB:

- Proposed Plan Designations – North Gateway shows lands designated Urban holding Area- Employment, Natural Resource and Public/Semi-Public.
- Proposed Plan Designations – Mill Race shows lands designated Urban holding Area- Employment and Public/Semi-Public.
- Proposed Plan Designations – Willamalane Properties shows lands designated Public/Semi-Public.

Ordinance Exhibit A-3 Maps illustrate the appropriate zoning Springfield and Lane County assigned to lands added to the UGB: the interim Agriculture-Urban Holding Area (AG) zoning that maintains the land's potential for planned urban development, and the Public Land and Open Space (PLO) zone.

- Proposed zoning - North Gateway shows lands zoned Agriculture-Urban Holding Area (AG) and lands zoned Public Land and Open Space (PLO).
- Proposed zoning - Mill Race shows lands zoned Agriculture-Urban Holding Area (AG) and lands zoned Public Land and Open Space (PLO).
- Proposed zoning - Willamalane Properties shows lands zoned Public Land and Open Space (PLO).

OAR 660-024-0050(6) is addressed in the City's findings on pages 106-118 of this report.

<u>Conclusion OAR 660-024-0050(6)</u>. The City and Lane County assigned appropriate urban plan designations to the added land, to meet specific land needs and siting characteristics identified in the employment land need determination and to designate and zone land accommodating existing public facilities, parks and open space with appropriate Metro Plan/Springfield 2030 Plan designations and Springfield zoning. The AG zone is an interim zoning that maintains the land's potential for planned urban development, maintaining the suitable employment as urbanizable land until the land is rezoned for the planned urban uses as described in the policies of the 2030 Plan Urbanization Element and AG Zoning District standards.

Conclusion OAR 660-024-0050. As explained in the City's findings and the CIBL/EOA, the City conducted inventories of 20-year land needs in accordance with the applicable statutes and rules and responded to the identified deficiencies as required under Goals 9 and 14.

VI. Springfield Urban Growth Boundary Location Alternatives Analysis: Introduction, Process Overview and Summary of Results

Pages 156-421 of this report provide detailed documentation of Springfield's Boundary Alternatives Analysis process and how that analysis is consistent with the priorities statute and urbanization rule. The 2030 Plan proposal was initiated on December 31, 2009 and was prepared to address the requirements of the applicable statutes and rules in effect at that time, including ORS 197.298, Goal 14 ef. April 28, 2006 OAR 660-015-0000(14) and Division 24 cert. ef. April 16, 2009.

The sequencing of analytical steps applied in the City's final boundary location analysis and the organization of the City's findings in pages 156-421 follow the analytical structure outline suggested by Department of Land Conservation and Development (DCLD) urbanization specialist staff Gordon Howard and provided to the City's legal counsel Emily Jerome by DLCD local representative staff Ed Moore (email received by staff Pauly from City's consultant Emily Jerome, January 9, 2014, and attachment "Suggested Outline for Locational Analysis Based Upon Current Law/McMinnville Decision for Eugene"). That outline suggested the following sequencing of steps to apply Goal 14 factors in the analysis of each priority of land under ORS 197.298:

A. APPLY THE FOLLOWING FACTORS TO EXCLUDE (OR INCLUDE LOWER PRIORITY) LANDS FROM THE UGB:

a. Exclude lands that are not buildable

b. Exclude lands based upon specific land needs (197.298(3)(a))

c. Exclude lands based upon inability to reasonably provide urban services due to physical constraints (197.298(3)(b))

d. Include lower priority lands needed to include or provide services to urban reserve lands (197.298(3)(c))

e. Exclude lands based upon analysis of comparative ESEE consequences (Goal 14, Boundary Location, Factor 3)

f. Exclude lands based upon analysis of compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4)

QUESTION: Where are UGB Goal 14 Locational Factors 1 and 2?

ANSWER: According to "McMinnville" logic, they are redundant and less restrictive than two of the corresponding factors in ORS 197.298, and thus drop out at this stage of analysis.

B. IF THE AMOUNT OF LAND REMAINING AFTER EXCLUSIONS IS GREATER THAN THE AMOUNT OF NEEDED LANDS, THEN:

Apply the following factors INTERDEPENDENTLY to pick and choose among the land remaining after exclusions:

a. Efficient accommodation of identified land needs (Goal 14, Boundary Location, Factor 1)

b. Orderly and economic provision of services (Goal 14, Boundary Location, Factor 2)

c. Comparative ESEE consequences (Goal 14, Boundary Location, Factor 3)
d. Compatibility with agricultural and forest activities (Goal 14, Boundary Location, Factor 4)

C. IF THE AMOUNT OF LAND REMAINING AFTER EXCLUSIONS IS LESS THAN THE AMOUNT OF NEEDED LANDS, THEN GO TO THE NEXT LOWER PRIORITY

Following is a summary of how the City applied the analytical framework and the conclusions that it reached. The evidence and analysis that formed the basis of these conclusions is set forth in detail in the remainder of Section IV.

A Step-by-Step Summary of Springfield UGB Location Alternatives Analysis Process and Results

1. Establish Preliminary Study Area

2. Identify candidate second priority land parcels: exception land

3. Exclude second priority lands that are not buildable
   - The City excluded Slopes >15%
   - The City excluded Floodway
   - The City excluded Riparian resources
   - The City excluded Wetlands

4. Exclude second priority lands based upon specific land needs (197.298(3)(a));
   - The City excluded exception parcels with less than 5 unconstrained acres.
   - This step excluded the McKenzie View A; West Jasper/Mahogany; Clearwater; Seavey Loop A, D, F, and Seavey Loop/Goshen exception parcels from further consideration.

5. Exclude second priority lands based upon inability to reasonably provide urban services due to physical constraints (197.298(3)(b))
   - This step excluded McKenzie View B; Mohawk A, B and C; Oxbow/Camp Creek; Jasper Bridge A and B; Far East B; Wallace Creek; Seavey Loop B, C and E exception parcels because these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses due to physical constraints. The City determined that these areas are not serviceable to meet Springfield's identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).

6. Exclude second priority lands based upon analysis of comparative ESEE consequences (Goal 14, Boundary Location, Factor 3);

- This step excluded Far East A. The City determined that the cost to serve 2 parcels 5 acres or larger — a total of 13.3 acres — is not economically feasible. These parcels are not contiguous to one another. Slopes exceed 7%.

7. Exclude second priority lands based upon analysis of compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4)
    - This step confirmed exclusion of Far East A.

    No second priority lands remained after this step, thus Location Factors 1 and 2 were not applied.

8. Identify candidate third priority land parcels: marginal land

9. Exclude third priority lands that are not buildable
    - The City excluded Slopes >15%
    - The City excluded Floodway
    - The City excluded Riparian resources
    - The City excluded Wetlands
    - This step identified (3) potentially suitable parcels of 5.8, 8, and 9.3 unconstrained acres in Mohawk Marginal for further analysis and excluded other Mohawk Marginal parcels from further analysis.
    - This step identified (2) potentially suitable parcels of 17.7 and 17.9 unconstrained acres in Wallace Creek Marginal A for further analysis, excluded other parcels from further analysis.
    - This step excluded the Oxbow/Camp Creek Marginal and Wallace Creek B Marginal parcels from further analysis.

10. Exclude third priority lands based upon specific land needs (197.298(3)(a));
    - This step excluded parcels with less than 5 unconstrained acres.
    - The City excluded lands based on slopes exceeding 7%, distance to I-5
    - This step excluded Oxbow/Camp Creek Marginal from further analysis.
    - This step excluded Wallace Creek Marginal A from further analysis.
    - This step confirmed exclusion of Wallace Creek Marginal B parcels.
    - This step excluded Mohawk Marginal parcels.

11. Exclude third priority lands based upon inability to reasonably provide urban services due to physical constraints (197.298(3)(b))
    - This step confirmed exclusion of Mohawk Marginal parcels.
    - This step confirmed exclusion of Wallace Creek Marginal A parcels.
    - This step confirmed exclusion of Oxbow/Camp Creek Marginal parcels.

12. Exclude third priority lands based upon analysis of comparative ESEE consequences (Goal 14, Boundary Location, Factor 3);
    - This step confirmed exclusion of Mohawk Marginal parcels
    - This step confirmed exclusion of Wallace Creek Marginal A
    - This step confirmed exclusion of Oxbow/Camp Creek Marginal.

13. Exclude third priority lands based upon analysis of compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4)
    - N/A
    - This step confirmed exclusion of all Third Priority lands

    No third priority lands remained after this step, thus Location Factors 1 and 2 were not applied.

14. Identify candidate fourth priority land

15. Exclude fourth priority lands that are not buildable
    - The City excluded Slopes >15%
    - The City excluded Floodway
    - The City excluded Riparian resources
    - The City excluded Wetlands

16. Exclude fourth priority lands based upon soil capability classification
    - The City excluded North Gateway — North of Sprague Road lands comprising predominantly Class II soils on the basis of agricultural capability classification.
    - The City excluded unconstrained McKenzie View lands comprising predominantly Class I and II soils on the basis of agricultural capability classification.
    - The City excluded unconstrained Oxbow/Camp Creek lands comprising predominantly Class I, Class II and Class III High Value Farmland soils on the basis of agricultural capability classification.
    - The City excluded unconstrained Hayden Bridge lands comprising predominantly Class II soils on the basis of agricultural capability classification.
    - The City excluded unconstrained Mohawk lands comprising predominantly Class I and II soils on the basis of agricultural capability classification.
    - The City excluded unconstrained North Springfield Highway lands comprising predominantly Class II soils on the basis of agricultural capability classification.
    - The City excluded unconstrained Thurston lands comprising predominantly Class I and II soils on the basis of agricultural capability classification.
    - The City excluded unconstrained Far East — North of Highway 126 lands comprising predominantly Class I and II soils on the basis of agricultural capability classification.
    - The City excluded unconstrained South Hills lands comprising predominantly Class III High Value Farmland soils on the basis of agricultural capability classification.

- The City excluded unconstrained West Jasper/Mahogany lands comprising predominantly Class II soils on the basis of agricultural capability classification.
- The City excluded unconstrained Jasper Bridge lands comprising predominantly Class I and II soils on the basis of agricultural capability classification.
- The City excluded unconstrained Clearwater lands comprising predominantly Class II soils on the basis of agricultural capability classification.
- The City excluded unconstrained Wallace Creek lands comprising predominantly Class II and III High Value Farmland soils on the basis of agricultural capability classification.
- The City excluded unconstrained Seavey Loop lands comprising predominantly Class II, Class III High Value and Class IV Prime Farmland soils on the basis of agricultural capability classification.

17. Exclude fourth priority lands based upon specific land needs (197.298(3)(a)):
    - The City excluded unconstrained lands in Far East — South of Highway 126 within 1 mile of UGB on the basis of specific land needs. (slopes exceed 7%, distance to I-5)
    - The City excluded unconstrained South Hills lands on the basis of specific land needs. (slopes exceed 7%, distance to I-5)
    - The City excluded unconstrained West Jasper/Mahogany lands on the basis of specific land needs (distance to I-5)
    - This step confirmed exclusion of Clearwater lands on the basis of specific land needs.
    - The City excluded unconstrained Wallace Creek lands on the basis of specific land needs.

18. Exclude fourth priority lands based upon inability to reasonably provide urban services due to physical constraints (197.298(3)(b))
    - The City excluded unconstrained land in McKenzie View on the basis of inability to reasonably provide urban services due to physical constraints.
    - The City excluded unconstrained land in Oxbow/Camp Creek on the basis of inability to reasonably provide urban services due to physical constraints.
    - This step confirmed exclusion of Mohawk on the basis of inability to reasonably provide urban services due to physical constraints.
    - The City excluded unconstrained Far East — farther than 1 mile from UGB on the basis of inability to reasonably provide urban services due to physical constraints.
    - The City excluded unconstrained Wallace Creek lands on the basis of inability to reasonably provide urban services due to physical constraints.
    - This step confirmed exclusion of Seavey Loop on the basis of inability to reasonably provide urban services in due to physical constraints.

19. Exclude fourth priority lands based upon analysis of comparative ESEE consequences (Goal 14, Boundary Location, Factor 3);
    - This step confirmed exclusion of McKenzie View land (cost, remote, contrary to compact urban development, no transit, landslide hazards, farmland)

- This step confirmed exclusion of Oxbow/Camp Creek (cost, remote, contrary to compact urban development, no transit, landslide hazards, farmland)
- This step confirmed exclusion of Mohawk (cost inhibitive infrastructure upgrades to cross river, distance, unsuitable location, remote, contrary to compact urban development, no transit, landslide hazards, farmland)
- This step confirmed exclusion of North Springfield Highway (environmental, flooding, stormwater discharge regulations, habitat)
- This step confirmed exclusion of West Jasper/Mahogany (cost/benefit, cost inhibitive infrastructure upgrades, no transit, environmental, habitat, social, farmland)
- This step confirmed exclusion of Clearwater (no transit, social, farmland)
- This step confirmed exclusion of Wallace Creek lands on the basis of (cost/benefit, landslide hazards, cost inhibitive infrastructure upgrades, contrary to compact urban development, no transit)
- This step confirmed exclusion of Far East (cost/benefit, cost inhibitive infrastructure upgrades, farmland, contrary to compact urban development, no transit, landslide hazards)
- This step confirmed exclusion of Seavey Loop (contrary to compact urban development, cost inhibitive infrastructure upgrades, cost/benefit, social consequences, farmland)

20. Exclude <u>fourth priority</u> ands based upon analysis of compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4)
    - This step confirmed exclusion of McKenzie View
    - This step confirmed exclusion of Hayden Bridge
    - This step confirmed exclusion of Thurston
    - This step confirmed exclusion of Mohawk
    - This step confirmed exclusion of Oxbow/Camp Creek
    - This step confirmed exclusion of Far East
    - This step confirmed exclusion of Clearwater
    - This step confirmed exclusion of West Jasper/Mahogany
    - This step confirmed exclusion of Jasper Bridge
    - This step confirmed exclusion of South Hills
    - This step confirmed exclusion of Wallace Creek
    - This step confirmed exclusion of Seavey Loop

21. Apply Factors 1 and 2 to confirm selection of parcels to be included in UGB: North Gateway UGB to Sprague Road and Mill Race areas in the UGB expansion.
    - This step confirmed inclusion of North Gateway to Sprague Road and Mill Race areas Factor 1: Efficient accommodation of identified land needs
    - This step confirmed inclusion of North Gateway to Sprague Road and Mill Race areas Factor 2: Orderly and economic provision of public facilities and services

VI. UGB Expansion Study

OAR 660-024-0060 Boundary Location Alternatives Analysis

OAR 660-024-0060(1)

"(1) When considering a UGB amendment, a local government must determine which land to add by evaluating alternative boundary locations. This determination must be consistent with the priority of land specified in ORS 197.298 and the boundary location factors of Goal 14, as follows:

(a) Beginning with the highest priority of land available, a local government must determine which land in that priority is suitable to accommodate the need deficiency determined under OAR 660-024-0050.

(b) If the amount of suitable land in the first priority category exceeds the amount necessary to satisfy the need deficiency, a local government must apply the location factors of Goal 14 to choose which land in that priority to include in the UGB.

(c) If the amount of suitable land in the first priority category is not adequate to satisfy the identified need deficiency, a local government must determine which land in the next priority is suitable to accommodate the remaining need, and proceed using the same method specified in subsections (a) and (b) of this section until the land need is accommodated.

(d) Notwithstanding subsection (a) to (c) of this section, a local government may consider land of lower priority as specified in ORS 197.298(3).

(e) For purposes of this rule, the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under section (5) of this rule, as well as other provisions of law applicable in determining whether land is buildable or suitable."

OAR 660-024-0060(3)

"The boundary location factors of Goal 14 are not independent criteria. When the factors are applied to compare alternative boundary locations and to determine the UGB location, a local government must show that all the factors were considered and balanced."

OAR 660-024-0060(4)

"In determining alternative land for evaluation under ORS 197.298, "land adjacent to the UGB" is not limited to those lots or parcels that abut the UGB, but also includes land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency."

OAR 660-024-0060(5)

"If a local government has specified characteristics such as parcel size, topography, or proximity that are necessary for land to be suitable for an identified need, the local government may limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298."

OAR 660-024-0060(6)

"The adopted findings for UGB adoption or amendment must describe or map all of the alternative areas evaluated in the boundary location alternatives analysis. If the analysis involves more than one parcel or area within a particular priority category in ORS 197.298 for which circumstances are the same, these parcels or areas may be considered and evaluated as a single group."

OAR 660-024-0060(7)

"For purposes of Goal 14 Boundary Location Factor 2, "public facilities and services" means water, sanitary sewer, storm water management, and transportation facilities."

OAR 660-024-0060(8)

"The Goal 14 boundary location determination requires evaluation and comparison of the relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services needed to urbanize alternative boundary locations. This evaluation and comparison must be conducted in coordination with service providers, including the Oregon Department of Transportation with regard to impacts on the state transportation system. "Coordination" includes timely notice to service providers and the consideration of evaluation methodologies recommended by service providers. The evaluation and comparison must include:

(a) The impacts to existing water, sanitary sewer, storm water and transportation facilities that serve nearby areas already inside the UGB;

(b) The capacity of existing public facilities and services to serve areas already inside the UGB as well as areas proposed for addition to the UGB; and

(c) The need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements

on existing roadways and, for urban areas of 25,000 or more, the provision of public transit service."

The following section of this report provides empirical evidence and findings to explain how the City's Boundary Location Alternatives Analysis was conducted consistent with each of the requirements of ORS 197.298 and OAR 660-024-0060. Beginning with the highest priority of land available, the City's Preliminary Study Area included all land adjacent to the UGB, including land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency. The City evaluated the parcels within each priority to determine whether parcels are potentially suitable to satisfy the identified need deficiency determined under OAR 660-024-0050.

BOUNDARY ALTERNATIVES ANALYSIS STEP ONE: IDENTIFY SITE CHARACTERISTICS TO APPLY IN THE LOCATION ALTERNATIVES ANALYSIS PROCESS TO DETERMINE WHICH LANDS ARE SUITABLE TO ACCOMMODATE LAND NEED [OAR660-024-0060(1) and (4)]

As explained in the preceding section of this report (Goal 9), the CIBL/EOA [1] provides a determination of the amount and type of land needed in the UGB amendment to accommodate Springfield's employment land needs for 2010-2030.

OAR 660-009-0005 states that "the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under Section (5), as wells as other provisions of law applicable in determining whether land is buildable or suitable."

As explained in the City's findings under Goal 9, the CIBL/EOA [2] provides a determination that the amount and type of land needed in the UGB amendment to accommodate Springfield's employment land needs for 2010-2030 is 223 suitable acres, including 3 sites larger than 20 acres, possessing the suitability characteristics specified under OAR 660-009-0005(5). Site and land needs are summarized in CIBL/EOA Table S-5:

[1] CIBL/EOA Table S-5, page ix.
[2] Ibid.

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

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

Source: ECONorthwest

After accounting for available land supply and the results of efficiency measures, Table 5-4 of the CIBL/EOA identifies employment needs that require expansion of the UGB as follows:

Commercial and Mixed-Use (**Land Need = 5 sites, 97 acres**). After accounting for vacant, partially-vacant and potentially redevelopable commercial and mixed use land supply within the UGB, there is an unmet need for 5 commercial and mixed-use sites totaling an estimated 97 acres.

Industrial **(Land Need = 2 sites, 126 acres**). After accounting for vacant, partially-vacant and potentially redevelopable industrial land supply within the UGB, unmet industrial need is identified as 2 large sites, totaling an estimated 126 acres.

Total land needed in the UGB expansion of 223 suitable acres: 3 sites larger than 20 acres and 4 sites 5-20 acres.

The sites needed in the UGB expansion to meet special site needs meet the site requirements described on pages 82-95 of the CIBL/EOA Characteristics of Needed Sites.

Springfield has the need for sites larger than five acres: two Industrial sites on a total of 126 acres and five Commercial and Mixed Use sites on a total of 97 acres. The total number of acres needed in the UGB expansion is based on the average size of needed sites, as explained in CIBL/EOA Table S-3[3].

Springfield needs to expand the UGB to meet its need for sites 5 acres and larger. Springfield has a deficit of four sites between 5 and 20 acres in size and three sites larger than 20 acres. Meeting the need for large sites for large employers requires the City to expand its UGB into areas with suitable sites. These areas will have relatively large, flat sites with little parcelization and few owners, with access to I-5 or a State highway.

[3] ECONorthwest, CIBL/EOA, p. vii.

Springfield has a deficit of two Industrial sites 20 acres and larger, four Commercial and Mixed Use sites 5 to 20 acres in size, and one Commercial and Mixed Use site 20 acres and larger.

The City's CIBL/EOA[4] identifies the number of sites by type reasonably expected to be needed to accommodate the expected employment growth based on the site characteristics typical of expected uses, as required under OAR 660-009-0015(2). The City's CIBL/EOA[5] identifies site characteristics that make land suitable to accommodate the need deficiency determined under OAR 660-024-0050. The City identified the parcel size, topography, transportation access and access to city services site characteristics necessary for a site to be considered suitable for each type of target industry identified in the CIBL/EOA.

The tables in Chapter 5 and Appendix C provide data to document typical building and site needs of various industries.[6] In addition to the evidence provided in the CIBL/EOA document, the record provides extensive supplemental evidence to explain the site needs of industries and the typical characteristics of sites that are necessary to support business operations and develop in accordance with applicable Federal, State and Local regulatory requirements.

Table C-5 "Characteristics of Sites Needed to Accommodate Employment Growth"[7] presents and explains common site needs for expected industrial and other employment uses. Table C-5 summarizes 14 site attributes and explains how each attributes aligns with Springfield sites: flat site; parcel configuration and parking; soil type; road, rail, air, transit transportation; pedestrian and bicycle facilities; labor force; amenities; fiber optics and telephone; potable water; power requirements, and land use buffers.

The characteristics of sites needed to address the site needs of Springfield's target industries are explained in CIBL/EOA pp. 82-95 and are-summarized as follows:

[4] ECONorthwest, CIBL/EOA, Chapter 4 and 5, Table 5-5, Appendix C
[5] Ibid, pp. 82-95.
[6] CIBL/EOA Chapter 5 and Appendix C.
[7] CIBL/EOA. P. 167-169

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

The following section of this report provides evidence to demonstrate how the City conducted the Boundary Location Alternatives Analysis to include land adjacent to the UGB and land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency.

BOUNDARY ALTERNATIVES ANALYSIS STEP TWO: DETERMINE PRIORITY OF LAND AS SPECIFIED IN ORS 197.298 TO DETERMINE PRIORITY OF LAND TO BE INCLUDED IN UGB AMENDMENT

To determine which lands to add to the UGB to meet the specified land needs, the City evaluated alternative boundary locations in accordance with the priority of land specified in ORS 197.298 and the requirements of the urbanization rule.

ORS 197.298 Priority of land to be included within urban growth boundary

> *"(1) In addition to any requirements established by rule addressing urbanization, land may not be included within an urban growth boundary except under the following priorities:*
>
> *(a) First priority is land that is designated urban reserve land under ORS 195.145 (Urban reserves), rule or metropolitan service district action plan.* (emphasis added)
>
> *(b) If land under paragraph (a) of this subsection is inadequate to accommodate the amount of land needed, second priority is land adjacent to an urban growth boundary that is identified in an acknowledged comprehensive plan as an exception area or nonresource land. Second priority may include resource land that is completely surrounded by exception areas unless such resource land is high-value farmland as described in ORS 215.710 (High-value farmland description for ORS 215.705).*
>
> *(c) If land under paragraphs (a) and (b) of this subsection is inadequate to accommodate the amount of land needed, third priority is land designated as marginal land pursuant to ORS 197.247 (1991 Edition).*
>
> *(d) If land under paragraphs (a) to (c) of this subsection is inadequate to accommodate the amount of land needed, fourth priority is land designated in an acknowledged comprehensive plan for agriculture or forestry, or both.*
>
> *(2) Higher priority shall be given to land of lower capability as measured by the capability classification system or by cubic foot site class, whichever is appropriate for the current use.*
>
> *(3) Land of lower priority under subsection (1) of this section may be included in an urban growth boundary if land of higher priority is found to be inadequate to*

accommodate the amount of land estimated in subsection (1) of this section for one or more of the following reasons:

(a) Specific types of identified land needs cannot be reasonably accommodated on higher priority lands;

(b) Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or

(c) Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands. [1995 c.547 §5; 1999 c.59 §56]"

OAR 660-024-0060(1)(a)

"Beginning with the highest priority of land available, a local government must determine which land in that priority is suitable to accommodate the need deficiency determined under OAR 660-024-0050. "

OAR 660-024-0060(1)(e)

"For purposes of this rule, <u>the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics</u> specified under section (5) of this rule, as well as other provisions of law applicable in determining whether land is buildable or suitable." (emphasis added)

OAR 660-024-0060(4)

"In determining alternative land for evaluation under ORS 197.298, "land adjacent to the UGB" is not limited to those lots or parcels that abut the UGB, but also includes land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency."

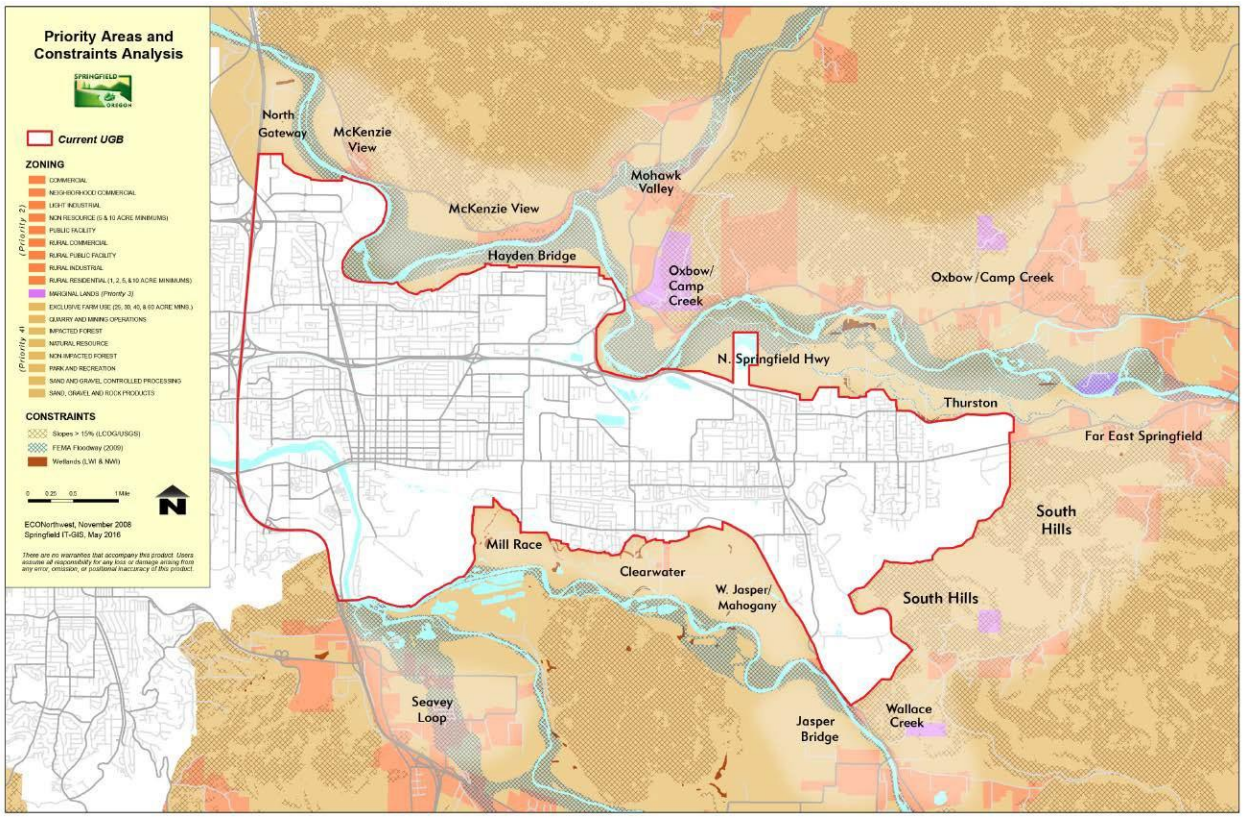
OAR 660-024-0060(6)

"The adopted findings for UGB adoption or amendment must <u>describe or map all of the alternative areas evaluated</u> in the boundary location alternatives analysis. <u>If the analysis involves more than one parcel or area within a particular priority category in ORS 197.298 for which circumstances are the same, these parcels or areas may be considered and evaluated as a single group</u>." (emphasis added)

The following section of this report explains how the City's UGB alternatives analysis addressed ORS 197.298 and OAR 660-024-0060(4) to identify the preliminary UGB study area and to determine which land in the vicinity of the UGB within each priority is/is not suitable and thus has a reasonable potential to satisfy the employment land need deficiency determined under OAR 660-024-0050.

Methodology Used to identify candidate lands: UGB Study Area. To determine the priority of land to be included in the UGB to meet Springfield's 2010-2030 land needs, the City established a study area that identified potential candidate lands under the four priorities of ORS 197.298. The City and consultant ECONorthwest conducted initial GIS scans of all land adjacent to and in the vicinity of the existing Springfield portion of the Metropolitan UGB (east of Interstate 5). The Eugene-Springfield Metro Plan identifies Interstate Highway 5 as the boundary between Springfield's and Eugene's jurisdictional areas. The acknowledged Springfield UGB follows the centerline of Interstate Highway 5. The City of Eugene is presently conducting an UGB alternatives analysis for lands located east of Interstate Highway 5.

As shown in Map 1, Priority Areas and Constraints Analysis, the lands surrounding the UGB were divided into 15 general groupings and named for study and communication purposes. The study area included all lands surrounding the UGB east of Interstate Highway 5, lands located along the McKenzie River and its tributaries north of Springfield's UGB, lands in the southeast hills, and lands along the Middle Fork and Coast Fork of the Willamette River. The North Gateway and Seavey Loop study areas are located along Interstate Highway 5 north and south of Springfield respectively.



Map 1: Priority Areas and Constraints Analysis

UGB Study Area Groupings

North Gateway	McKenzie View	Hayden Bridge
Oxbow/Camp Creek	Mohawk	North Springfield Highway
Far East Springfield	South Hills	West Jasper/Mahogany
Wallace Creek	Jasper Bridge	Mill Race
Seavey Loop	Thurston	Clearwater

Conclusion: UGB Study Area: The City's UGB Study Area is appropriate and consistent with the requirements of ORS 197.298(1)(b) and OAR 660-024 -0060(4) because it includes lands "adjacent to the UGB", and it includes "land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency." As explained in detail below, the land within the study area was analyzed in accordance with the state statutes and administrative rules that dictate the way in which a city must select lands for a UGB expansion.

OAR 660-024-0060 Boundary Alternatives Analysis:

"(1) When considering a UGB amendment, a local government must determine which land to add by evaluating alternative boundary locations. This determination must be consistent with the priority of land specified in ORS 197.298 and the boundary location factors of Goal 14, as follows:

(a) Beginning with the highest priority of land available, a local government must determine which land in that priority is suitable to accommodate the need deficiency determined under OAR 660-024-0050.

(b) If the amount of suitable land in the first priority category exceeds the amount necessary to satisfy the need deficiency, a local government must apply the location factors of Goal 14 to choose which land in that priority to include in the UGB."

IDENTIFY FIRST PRIORITY: URBAN RESERVE.

ORS 197.298 (1)(a) Priority of land to be included within urban growth boundary

"(1) In addition to any requirements established by rule addressing urbanization, land may not be included within an urban growth boundary except under the following priorities:

(a) First priority is land that is designated urban reserve land under ORS 195.145 (Urban reserves), rule or metropolitan service district action plan."

The Eugene-Springfield Metro area has no designated urban reserves under ORS 195.145, therefore Springfield's priority lands analysis begins with second priority land identified in an acknowledged

comprehensive plan as an exception area or nonresource land, and continues through third priority land designated as marginal, to fourth priority land designated as resource land, and finally to resource land in the order of land capability classifications VIII though I.

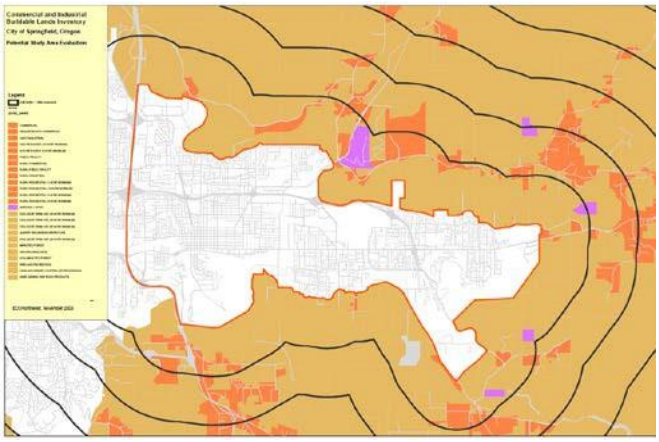
Conclusion ORS 197.298 (1)(a) First Priority Land: There are no Urban Reserves in the vicinity of Springfield or the Eugene-Springfield Metro area. No first priority land is available to accommodate the need deficiency determined under OAR 660-024-0050, thus the City looked to second priority land.

IDENTIFY SECOND PRIORITY: EXCEPTION AREA OR NON-RESOURCE LAND

ORS 197.298 (1)(b):

> *"If land under paragraph (a) of this subsection is inadequate to accommodate the amount of land needed, second priority is land adjacent to an urban growth boundary that is identified in an acknowledged comprehensive plan as an exception area or nonresource land. Second priority may include resource land that is completely surrounded by exception areas unless such resource land is high-value farmland as described in ORS 215.710 (High-value farmland description for ORS 215.705)."*

The UGB study area includes land adjacent to the UGB that is identified in the Lane Rural Comprehensive Plan as an exception area or nonresource land. These parcels are identified by orange color in Map 1 Priority Areas and Constraints Analysis.



Relative Location of Exception and Marginal Lands to the UGB

This diagram provides a graphic device to show a general distance relationship. The black rings indicate one-mile increments radiating out from the UGB. Direct access between some of the Exception Lands and Marginal Lands and the UGB is not possible because topography and rivers impede access. Proximity to the UGB, public facilities and transportation systems is a factor in subsequent steps of this analysis.

As shown in the map above, Springfield is unlike many Oregon cities in that there are few exceptions areas adjacent to or in the immediate vicinity of the UGB. Most exception parcels closest to the City are small developed rural residential parcels on land divisions approved by Lane County prior to adoption of SB100 (e.g. parcels on Clearwater Lane and parcels immediately east of the UGB) and thus not suitable for meeting Springfield's large site employment land urbanization needs. Many of the exceptions parcels are remote and physically isolated from the City due to the natural barriers formed by the McKenzie and Middle Fork Willamette rivers, very steep topography of the Coburg Hills and Thurston South Hills, and other natural constraints that preclude building and site development. As shown in Map 1, and as explained in the following section of this report, most of the exceptions parcels areas in the vicinity of the UGB are located on the opposite side of the McKenzie and Middle Fork Willamette rivers, and many are constrained by slopes greater than 15%.

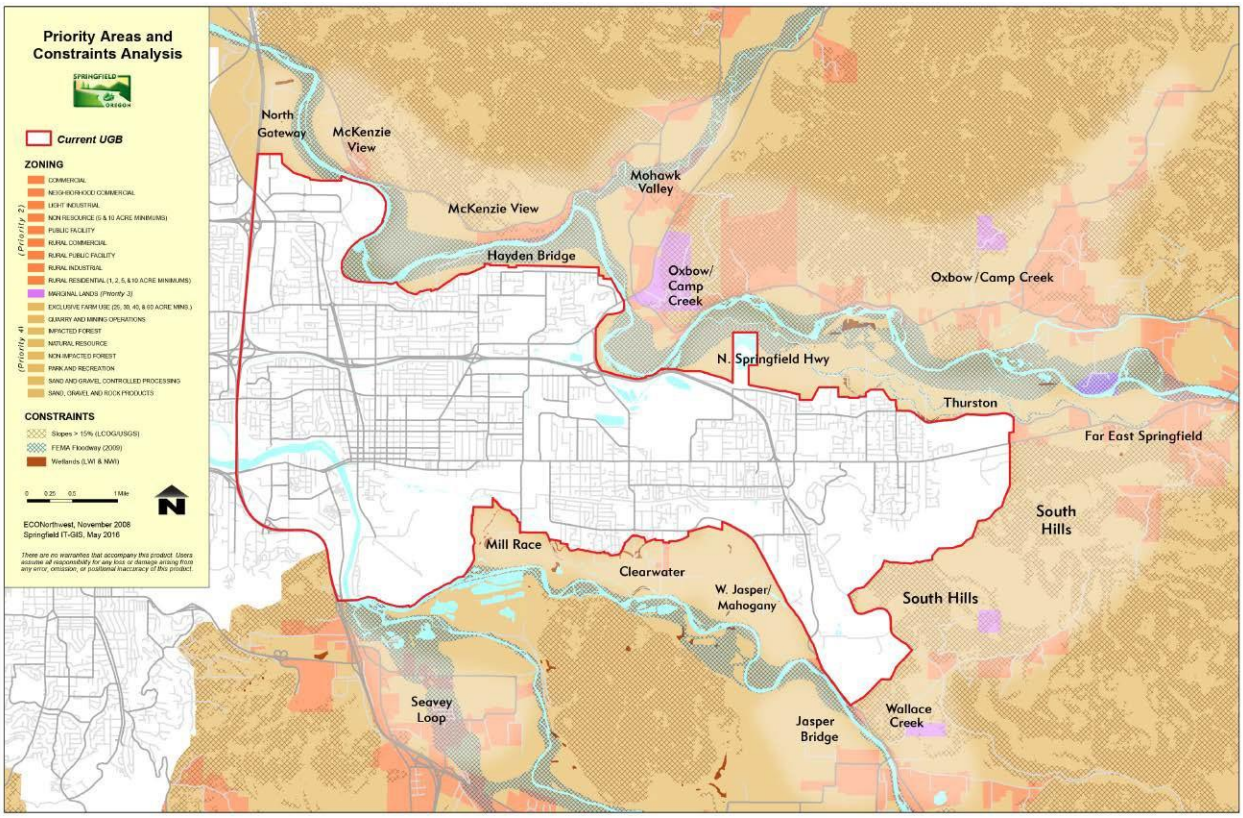


Table 1 Study Areas Containing Second Priority Exception Lands:

North Gateway	**McKenzie View**	**Oxbow/Camp Creek**
Hayden Bridge	**Mohawk**	North Springfield Highway
Far East Springfield	South Hills	**West Jasper/Mahogany**
Wallace Creek	**Jasper Bridge**	Mill Race
Seavey Loop	Thurston	**Clearwater**

Study areas with exception zoning are indicated by **orange** color

Nine groupings of exception parcels exist in the vicinity of the UGB east of I-5. The City included and evaluated all nine groupings of exception parcels in the UGB Study Area.

The City's UGB Study Area is appropriate and consistent with the requirements of ORS 197.298(1)(b) and OAR 660-024 -0060(4) because it includes lands "adjacent to the UGB", and it includes "land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency."

The City's UGB Study Area analysis properly began by identifying the highest priority of land available — exception land.

The City's analysis of UGB alternatives considered all exception land in the vicinity of the UGB when it established a UGB Study Area to identify candidate lands that may have a reasonable potential to satisfy the identified employment land need deficiency. [OAR 660-024-0060(4)]

OAR 660-024 0060(4)

> *(1) When considering a UGB amendment, a local government must determine which land to add by evaluating alternative boundary locations. This determination must be consistent with the priority of land specified in ORS 197.298 and the boundary location factors of Goal 14, as follows:*
>
> *(a) Beginning with the highest priority of land available, a local government must determine which land in that priority is suitable to accommodate the need deficiency determined under OAR 660-024-0050.*

To perform the next step in the analysis, the City conducted a parcel-by-parcel analysis of the highest priority of land – second priority exception land — adjacent to and in the vicinity of the UGB. The City compiled data in Table 2 to describe each exception land parcel or grouping of parcels. This step identified all candidate second priority exception areas and parcels that *could* potentially be added to the UGB if deemed suitable to accommodate the employment land need deficiency determined under OAR 660-024-0050. The City's description of each exception area in Table 2 includes maps and information to identify existing zoning, parcel sizes, map and tax lots numbers, existing land uses on developed parcels and general physical and locational characteristics.

The City's description of each exception area identified the presence of "absolute development constraints" (slopes >15%, floodway, wetlands, and riparian resource areas) on parcels to provide data to inform its determination of which second priority land parcels or portions of parcels *may* potentially be suitable to accommodate the employment land need deficiency determined under OAR 660-024-0050.

The City used industry standard GIS tools and mapping methods to quantify parcel and constraints data for evaluation. For the purposes of the preliminary screening of second priority land in Table 2 , the City applied the same constraints criteria as those applied in the City's Commercial and Industrial Buildable Lands (CIBL/EOA) inventory of land inside the UGB:

- Slopes – slopes over 15% are considered unbuildable
- Floodway – areas within the floodway as mapped by FEMA are considered unbuildable

- Wetlands – areas identified in the national wetlands inventory or Springfield's local wetlands inventory are considered unbuildable
- Riparian resource areas – areas identified by Springfield or Lane County as riparian resource areas are considered unbuildable.

In addition, the City's Boundary Alternatives Analysis reviewed and considered:

- Lane County Plan Designation, Zoning and Goal 5 Natural resources map data
- Hydric Soils maps - to identify areas where potential wetlands may occur in the study area
- Springfield Water Quality Limited Waterways Map
- NRCS Soils data
- BPA facilities data
- RLID Regional Land Information Database – to determine ownership and % of soil map units within a parcel.
- Interviews with public agency staff and service providers to determine and compare the constraints, public service needs, ESEE consequences and economic advantages/disadvantages of study areas within each priority of land (ODOT, Union Pacific Railroad, ODFW, LTD, Willamalane Parks and Recreation District, SUB, EPUD, Lane County staff, OSU Extension Service, Oregon Department of Agriculture, LRAPA, EWEB, Springfield Police, Eugene-Springfield Fire and Life Safety, Rainbow Water District, Goshen Fire District, Willamette Water Company, Business Oregon, Oregon Department of State Lands, DLCD, and Oregon Business Development Dept.
- Information provided by with stakeholders, neighborhoods groups, landowners, McKenzie Watershed Council, Friends of Buford Park, and individual citizens throughout the multi-year planning process.

OAR 660-009-0005(2)

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

OAR 660-009-0005(11)

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

The development constraints applied in the City's analysis Table 2 are constraints identified in OAR 660-009-0005(2) and site attributes identified in OAR 660-009-0005(11).

In Table 2, the City applied the "absolute development constraints" to parcels 5 acres or larger to calculate the acreage of unconstrained land within a parcel.

In Table 2, the City identified parcels with 5 or more acres of unconstrained land [OAR 660-009-0050(1)]. The City did not make deductions for existing development on parcels in this "first look" description step.

City appropriately applied constraints and site attributes consistent with OAR 660-009-0005(2) and OAR 660-009-0005(11) to the second priority land within the study area when it evaluated candidate parcels to include for employment purposes and when it identified parcels to exclude from further consideration.

The City's evaluation of constraints and site attributes on second priority land within the study area to inform its determination of which land in that priority is suitable to accommodate the employment land need deficiency is appropriate and consistent with OAR 660-024-0060(1)(a).

The City's analysis properly began with the highest priority of land available — exception land.

The City's analysis of UGB alternatives considered all exception land in the vicinity of the UGB when it applied its employment land suitability criteria (parcel size greater than 5 acres and land without absolute development constraints) to conduct the screen second priority lands in the preliminary study area.

The City's analysis of UGB alternatives applied parcel size and absolute development constraints uniformly to all second priority exception land in vicinity of the UGB that has a reasonable potential to satisfy the identified employment land need deficiency. (OAR 660-024-0060(4)].

This following section of the report "General Description of Second Priority Exception and Non-Resource Lands" provides explanation and evidence to support the City's findings addressing ORS 197.298(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060 (1)(c), OAR 660-024-0060(1)(d),OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR660-024-0060(5),

OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c).

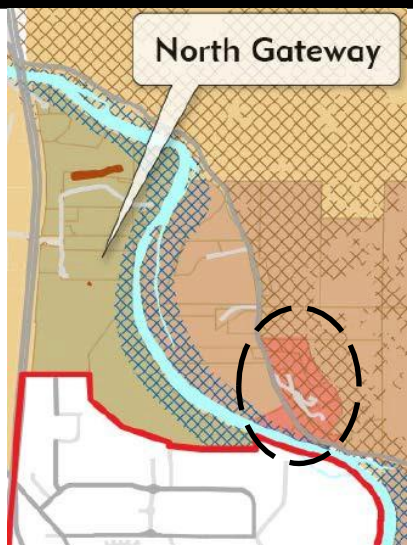
General Description of Second Priority Exception and Non-Resource Lands

Table 2 provides the general descriptive summary of the second priority exception and non-resource lands in the vicinity of the UGB. Table 2 identifies parcels or portions of parcels containing 5 acres or more without slope, wetland, floodway, riparian resource or highly irregular parcel shape configuration constraints that *may* potentially be suitable to accommodate the employment land need. These parcels are indicated by their underlined map and tax lot number in Table 2. OAR 660-009-0005(14) states: *"Vacant Land" means a lot or parcel: (a) Equal to or larger than one half-acre not currently containing permanent buildings or improvements; or (b) Equal to or larger than five acres where less than one half-acre is occupied by permanent buildings or improvements."*

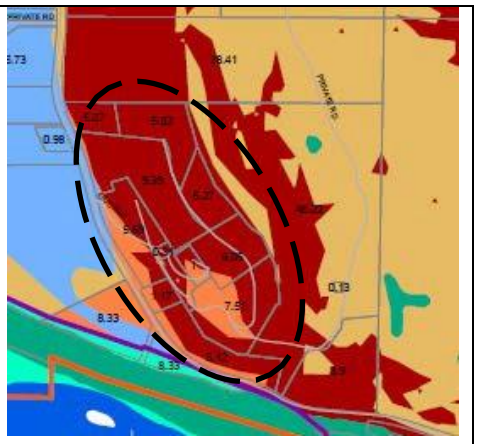
It should be noted that no deductions for existing rural development on parcels were made in Table 2. The few vacant parcels that exist are noted.

The red line in the maps below is the UGB.

Table 2: Second Priority Exception and Non-Resource Parcels and Constraints

McKenzie View A[8] • Located across the McKenzie River from Springfield's Gateway/International Way Campus Industrial employment area • Zoned RR-10 • Parcelized Lane Cedar Plat • Slopes predominantly >25%, Witzel 116G rock outcrop • Bisected by BPA easement • Some floodway, wetlands, hydric soils and Goal 5 riparian resources along the McKenzie River • TL 800 RR-10 11.9 acre parcel flat topo, partially in floodway, developed with rural residential use, has only 4.6 unconstrained acres. • Separated from UGB by resource lands to west, east, and north • (0) parcels with 5 or more unconstrained acres:	

[8] See maps in record "Employment Opportunity Area 1 North Gateway Area – Potential Study Area Evaluation", ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; and copy of A & T map 17-03-14-00 with exceptions parcels highlighted.
Slope percentages determined from NRCS data in the Lane County Regional Land Information Database

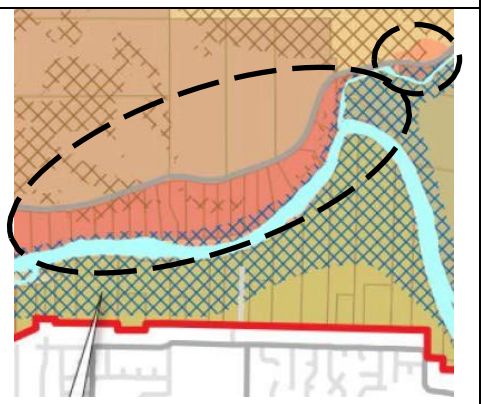


McKenzie View B

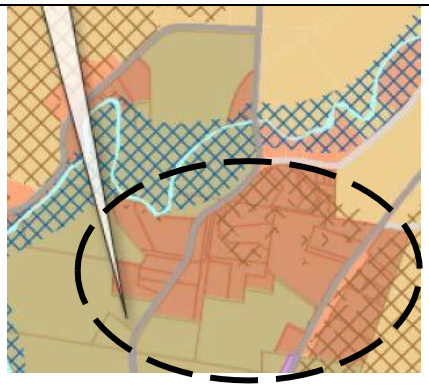
- Across the McKenzie River from Springfield
- RR-5 zoning
- Parcelized McKenzie View Estates, developed rural residential uses, 5-acre parcels are constrained by floodway and riparian resources
- Some floodway, wetlands, slopes >15%, and riparian resource constraints along the river frontage
- DOGAMI SLIDO mapped landslide areas Coburg Hills
- Separated from UGB by the river, EFU farmland between the river and the UGB, and the floodway
- (2) parcels with 5 or more unconstrained acres:
  <u>17-02-19-00 3000 (6.7ac.)</u>
  <u>17-02-19-00 3100 (5 ac.)</u>

TL 3000, 6.7 ac

TL 3100 5 ac



Mohawk A[9] • Adjacent to UGB and Marcola Rd. industrial employment area, but located across the McKenzie River. • The 50-acre EWEB parcel 17-02-20-00 407 is designated Industrial and zoned Rural Industrial, and the adjacent EWEB parcel to the south are designated Commercial and zoned Rural Commercial. Both are publicly owned land (EWEB). • Other smaller parcels are zoned Rural Residential. • Parcels on Camp Creek Rd. are .5 to 3.3 acre, developed with rural residential uses. • Some floodway, wetlands, slopes >15%, and riparian resource constraints along the river frontage • Exception parcels are located across Old Mohawk Road from Class I and II prime EFU farmland. • Marginal land parcels are located to the east and north. • Presence of hydric soils and visual reconnaissance suggests additional wetlands may be present. • Only one non-public land parcel is 5 acres or larger: ○ <u>17-02-20-00 202: 5.3 acres</u>, developed with rural residential use. 	 Star indicates 5-acre parcel

Mohawk B[10]
• Across the McKenzie River from Springfield
• Located .75 mile to more than 2 miles from UGB, not adjacent to UGB
• Largest exception parcel <u>17-02-17-00 1313 (18.3 acres)</u> is zoned Rural Residential and developed with the Jasper Mountain Safe Center psychiatric and substance abuse hospital NAICS 622210. This use is expected to continue.
• (1) Small Rural Industrial (RI) zoned parcels; are split by Marcola Rd. and separated from UGB by EFU land.
  ○ <u>17-02-17-00 1500 (5.7 ac., vacant</u>)
  ○ 17-02-17-00 1501 (1.9 ac.)
  ○ 17-02-17-00 1502 (1.5 ac.)
  ○ 17-02-17-00 1503 (2.4 ac.)
  Mohawk River floodway, riparian resource, and slope constraints present.
	

[9] See maps in record "Employment Opportunity Area 2 Hayden Bridge Area – Potential Study Area Evaluation", ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; and copy of A & T map 17-02-20-00 with exceptions parcels highlighted.

[10] See maps in record "Employment Opportunity Area 2 Hayden Bridge Area – Potential Study Area Evaluation", ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; and copy of A & T map 17-02-17-00 with exceptions parcels highlighted. Slope percentages determined from NRCS data in the Lane County Regional Land Information Database

- Rural Residential zoning: (2) RR5 parcels contain 5 or more unconstrained acres in size and are developed with rural residential uses.[11]
    - 17-02-17-00 1600 (5.4 ac.)
    - 17-02-17-00 1309 (7 ac.)
    - 17-02-17-00 1316 (5 ac.) – irregular shape
    - 17-02-17-00 1318 (5 ac.) – irregular shape
    - 17-02-17-00 0905 (5 ac. has floodway, and riparian resource constraints)
    - 17-02-17-00 0201 (9.2 ac. has floodway, and riparian resource constraints)
- Smaller parcels east of Marcola Road are constrained by slopes >15% and >25%, contain wetlands, hydric soils.
- Smaller parcels west of Jasper Mt. Center 2.5 to 5 acres contain slopes >15% and >25%
- DOGAMI SLIDO mapped landslide areas
- BPA easement crosses this area
- Separated from UGB by land zoned for Exclusive Farm Use (EFU) including Class I soils.
- Mohawk River flooding
- Presence of hydric soils and visual reconnaissance suggests additional wetlands may be present.

17-02-17-00 1502 1503 17-02-17-00 1501 17-02-01-00 1600

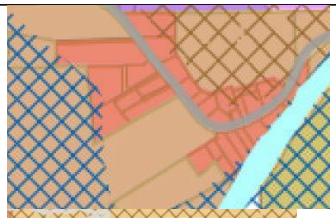
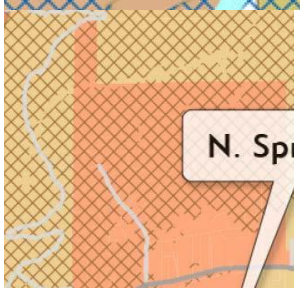
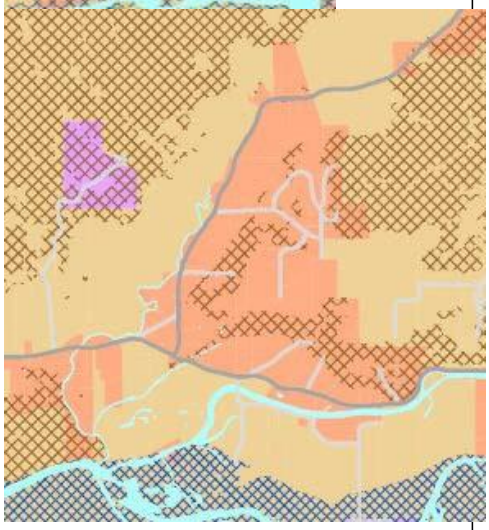
17-02-17-00 1309

17-02-17-00 1313
Jasper Mountain Safe Center

Mohawk C.

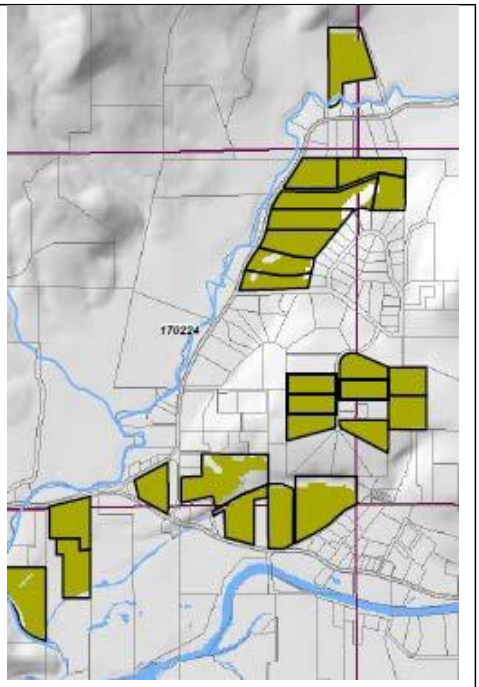
- Across the McKenzie River from Springfield
- Remote and isolated, more than 2 miles from UGB, not adjacent to UGB
- Presence of hydric soils and visual reconnaissance suggests additional wetlands may be present
- DOGAMI SLIDO mapped landslide areas
- RR5 zoning, parcels 1.1-8.7 ac
- (6) parcels are 5 acres in size, largest is is 8.7 acres, all are developed with rural residential uses:
    - 17-02-08-00 0515 (8.7 ac.)
    - 17-02-08-00 0516 (6.7 ac.)

[11] See copy of A & T map 17-02-17-00 in the record with exceptions parcels highlighted.

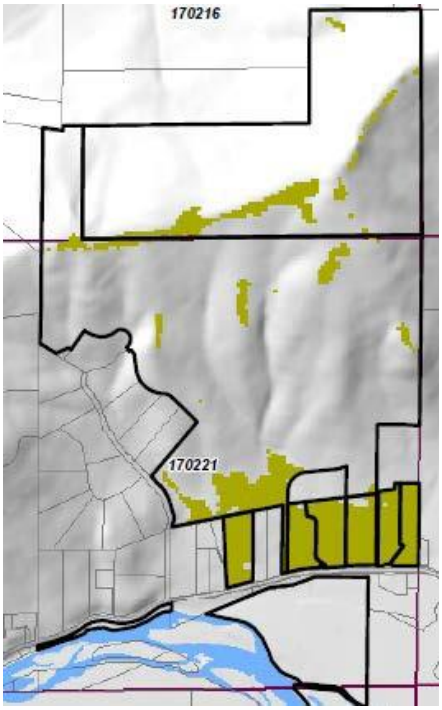
○ 17-02-08-00 0517 (6 ac.) ○ 17-02-08-00 0600 (5.8 ac.) ○ 17-02-08-00 0700 (5.7 ac.) ○ 17-02-08-00 0701 (5.5 ac.)	
Oxbow/Camp Creek[12] • Across the McKenzie River from Springfield • Majority of area is not adjacent to UGB • RR5 zoning, primarily 1 and 5 acre parcels along Camp Creek • Rd. and RR-10 zoning Upper Camp Creek Rd., McKenzie Ridge Subdivision (RR5-NRES zoning), Shenandoah and Jo-Nette Subdivisions • Unconstrained parcels 5 acres or larger are distant from Springfield, 2-6 miles from UGB at Hayden Bridge • Slopes > 25% constrain much of this area • DOGAMI SLIDO mapped landslide areas • Floodway and riparian resource constraints along river frontage. • Two BPA easements cross this area • Parcels containing 5 or more unconstrained acres (underlined) are zoned for and developed with rural residential uses except where noted: ○ 17-02-29-00 800 (5.6 ac.) ○ 17-02-21-00 107, (6.1 ac.) ○ 17-02-21-00 113, (6 ac.) ○ 17-02-21-00 128, (5.5 ac.) ○ 17-02-21-00 129, (6.6 ac.) ○ 17-02-21-00 801, (5 ac.) ○ 17-02-21-00 802, (5 ac.) ○ 17-02-22-00 500, (5 ac.) ○ 17-02-22-00 600, (5 ac.) ○ 17-02-26-00 704, (5.1 ac.) ○ 17-02-26-00 2100, (6.6 ac., vacant) ○ 17-02-25-00 1101 (8.1 ac.) ○ 17-02-25-00 1103, (7.7 ac.) ○ 17-02-25-00 1205, (10.4 ac.) ○ 17-02-25-00 2600, (6.9 ac.) ○ 17-02-24-00- 100 (7.8 ac.) ○ 17-02-24-00- 134 (5.6 ac.) ○ 17-02-24-00- 136 (8 ac.) RR-10 ○ 17-02-24-00 138 (8.1 ac.) ○ 17-02-24-00 141 (4.9 ac.) ○ 17-02-24-00 143 (6.9 ac.) ○ 17-02-24-00 144 (5.0 ac.)	  McKenzie Ridge tract 

[12] See maps in record "Employment Opportunity Area 3 North Springfield Highway Area – Potential Study Area Evaluation", ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; and copies of Lane County Assessor's maps 17-02-21-00, 17-02-21-24, 17-02-21-31, 17-02-22-00, 17-02-24-00, 17-02-25-00, 17-02-29-00, 17-02-19-00, 17-01-30-00, 17-01-29-00, 17-01-29-20 with exceptions parcels highlighted. Slope percentages determined from NRCS data in the Lane County Regional Land Information Database.

- 17-02-24-00 200 (6.8 ac.)
- 17-02-24-00 303 (5.0 ac.)
- 17-02-24-00 304 (5.0 ac.)
- 17-02-24-00 306 (5.0 ac.)
- 17-02-24-00 311 (5.0 ac.)
- 17-02-24-00312 (5.0 ac.)
- 17-02-24-00 313 (5.0 ac.)
- 17-02-24-00 1209 (11.6 ac.)
- 17-02-24-00 1400 (12.0 ac.)
- 17-02-24-00 1402 (7.7 ac.)
- 17-02-24-00 1501 (5.6 ac.)



- (1) large tract zoned RR5-NRES is vacant, but is constrained by slopes >15%:
  - 17-02-21-00 101 (19.7 ac.) unconstrained portions of McKenzie Ridge site are in SW corner of site (shown in green in map below). BPA easement crosses site.
  - 17-02-16-00 600 (11 ac.) unconstrained portions of McKenzie Ridge site are located along a ridgetop and in SW corner of site (shown in green in map below). BPA easement crosses site. Note this parcel has split zoning. The majority of this tract is F2 Impacted Forest resource land.[13]



17-02-21-00 101 & 17-02-16-00 600
(green indicates unconstrained portions of McKenzie Ridge tracts)

[13] See GIS screen shot map: "Camp Creek Exception-Non Resource 17-02-16-00 600" depicting location of RR-NRES portion of tract

17-02-21-00 107

17-02-21-00 113

17-02-21-00 128

17-02-21-00 129

17-02-29-00 801

17-02-29-00 800

17-02-22-00 500

17-02-22-00 600

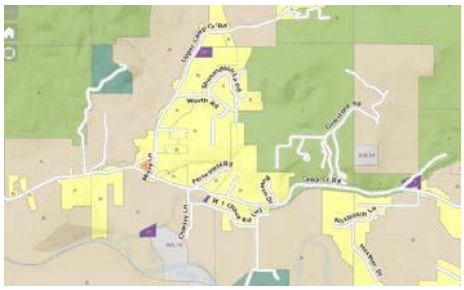
17-02-26-00 704

17-02-26-00 2100

- Parcels designated and zoned Public Facility (PF) include three non-contiguous parcels scattered throughout the area, owned by City of Eugene (17-01-29-21 100), Eugene Water and Electric Board (17-02-25-00 200 and 17-02-25-00 2200). Parcels are publicly-owned, developed with and necessary for public facilities uses and are not available or suitable to meet Springfield's employment land needs.

- Upper Camp Creek Rd. parcels are 6+ miles from UGB @ Hayden Bridge, or 5+ miles from UGB via Highway 126/Hendricks Bridge/Walterville, remote, isolated, and abut resource land on three sides, north of Camp Creek.

- One parcel containing 5 or more unconstrained acres 17-02-24-00- 1501, (5.6 ac.) is zoned for and developed with Rural Commercial use, and is not available or suitable to meet Springfield's employment land needs.



PF-designated land in **Oxbow/Camp Creek** area shown in purple

Far East Springfield A[14]
• Parcelized Rural Residential (RR-2 zoning)
• Some parcels abut eastern extent of UGB
• Parcels abut McKenzie Highway or Thurston Rd.
• Gay Creek bisects area
• Cedar Creek riparian resources
• Abuts large block of Class I and II prime farmland
• Slopes >25% south of McKenzie Highway
• DOGAMI SLIDO mapped landslide areas
• Clement Plat
• (2) non-contiguous parcels with 5+ unconstrained acres are within 1 mile of UGB:
  ○ 1702362401500 (6.4 acres), slopes >15%, developed residential use occupies highway side of parcel;
  ○ 1701312001500 (6.95 acres), developed residential use, entire property is sloped >12%, slopes >15% bisect the property between Hwy 126,developed with residential use, forested.
 	
	Star indicates 5-acre residential parcels

Far East Springfield B[15]
• Parcelized Cedar Flats and Upper Cedar Flats Rd. community
• Located more than 1.5 miles east of UGB, remote from Springfield, not adjacent to UGB
• Separated from UGB by block of Class II prime farmland between McKenzie River and McKenzie Highway or by steep slopes
• Bisected by Gay and Cedar Creeks
• Predominantly RR-5 zoning, (4) parcels with 5 or more unconstrained acres (underlined)
  ○ 1701322002800 (5.4 ac.) developed with residential use and orchard &1701322002801(7.8 ac., same owner)
  ○ 1701322002301 (8.3 ac.) res/ag use;
  ○ 1701322002802, RR5, constrained by slopes >15%;
  ○ 1701322002802, RR5, constrained by slopes >15%;	

[14] See maps in record "Employment Opportunity Area 4 Far East Springfield Area – Potential Study Area Evaluation", ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; A & T maps 17-02-36-10, 17-02-36-24, 17-01-31-20, and 17-01-31-00. Slope percentages determined from NRCS data in the Lane County Regional Land Information Database. See also Eugene-Springfield Metro Plan 1987 Update, Appendix C List of Exceptions, p. IV-17-33.

[15] See maps in record "Employment Opportunity Area 4 Far East Springfield Area – Potential Study Area Evaluation", ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; A & T maps 17-01-30-00, 17-01-32-30, 17-01-31-10, and 17-01-32-20. Slope percentages determined from NRCS data in the Lane County Regional Land Information Database

- 1701322002803, RR5, constrained by slopes >15%;
- 1701322002401 bisected by Cedar Creek;
- 1701322002601 (5 ac.), RR5, , flat topo, developed res use.

- One parcel TL300 is zoned Rural Commercial, 3.7 ac
- Upper Cedar Flats Rd. parcels constrained by slopes 15%-60%

TL300 RC, 3.2 ac

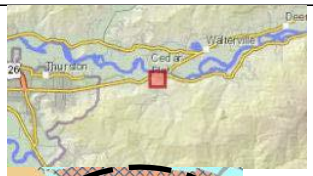
TL2900 RR5, 6.1 ac

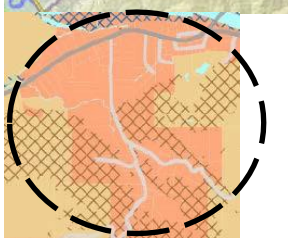
TL 2301, RR5, 8.4 ac

TL 2800 RR5, 5.1 ac

TL 2801, RR5 7.8 ac

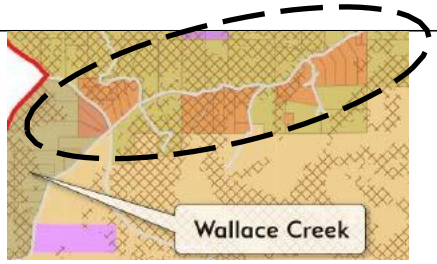
TL2601, RR5, 5 ac





Wallace Creek[16]

- Within 1 mile of UGB ridgeline, 1-2 miles to UGB via roads, remote from Springfield, not adjacent to UGB
- Parcelized
- Rural Residential zoning RR-5, Panorama Rd. (8) upper Wallace Creek parcels contain 5.3 to 8.9 unconstrained acres, developed with dwellings
  - 18-02-11-00 505 (5 ac.) slopes
  - 18-02-11-00 1401 (5.8 ac.), slopes 12-45%)
  - 18-02-11-00 1100 (5.8 ac.), slopes 12-45%)
  - 18-02-11-00 1200 (6.2 ac.), slopes 12-45%)
  - 18-02-12-00 500 (13.8 ac.) slopes
  - 18-02-12-00 603 (5.3 ac.)
  - 18-02-12-00 604 (6.4 ac.)
  - 18-02-12-00 605 (7.7 ac.)
  - 18-02-12-00 606 (6.4 ac.)
  - 18-02-12-00 615 (7.4 ac.)
  - 18-02-12-00 619 (8.9 ac.) 45% of lot is >12% slope
- Forested
- Steep slopes > 25%, some small flatter areas near the



[16] See maps in record "Employment Opportunity Area 5/6 Wallis Creek & West Jasper/Jasper Bridge Area – Potential Study Area Evaluation", ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; A & T maps 18-02-11-00, 18-02-12-00. Slope percentages determined from NRCS data in the Lane County Regional Land Information Database

junction of Wallace Creek Rd. and Weyerhaeuser Rd. and along upper Wallace Creek Rd.

- DOGAMI SLIDO mapped landslide data[17] "Very High" landslide susceptibility: Wallace Creek Rd. area

18-02-12-00 615

18-02-12-00 619

18-02-12-00 603

18-02-12-00 604

18-02-12-00 605

18-02-12-00 606

18-02-11-00 1100

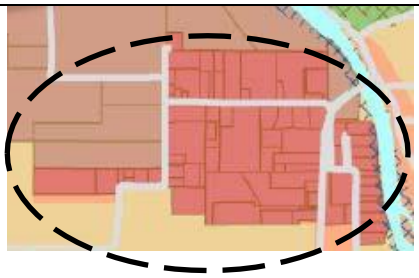
18-02-11-00 1200

18-02-11-00 505

18-02-11-00 1401

Jasper Bridge A[18]

- Within 1-mile SW of UGB via Jasper Lowell Rd, west of Jasper-Lowell Road
- Separated from Springfield by Willamette River, resource land, and sloped land inside UGB
- Access via Jasper Lowell Road, and west across the Willamette River via Parkway Rd. and Edenvale Rd.
- Parcelized Rural Residential RR-5, mostly developed
- Parcels along river constrained by floodway, riparian resources



[17] http://www.oregongeology.org/slido/index.html Statewide Landslide Information Layer for Oregon (SLIDO), Oregon Dept. of Geology and Mineral Industries, website accessed Feb. 29, 2016

[18] See maps in record "Employment Opportunity Area 5/6 Wallis Creek & West Jasper/Jasper Bridge Area – Potential Study Area Evaluation", ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; A & T maps 18-02-15-00, 18-02-22-00, 18-02-23-00

- Note: large block of Class I and II prime farmland is located immediately west of this area
- 71-acre Jasper State Park is zoned Park and Recreation
- Exception land along east side Jasper Lowell Road and Hills Creek Road is parcelized 1-2 acre Rural Residential
- 1-acre or smaller parcels along Parkway Rd. ~115 feet x 350 feet
- 30-acre RR site is Union Pacific Railroad
- 13-acre RR site on Edenvale Rd. is a mobile home park
- RR-zoned Parcels >5-acres are developed with rural residential uses:
    - 18-02-15-00 3302 (9.6 ac.)
    - 18-02-15-00 3303 (5 ac.)
    - 18-02-22-00 2100 (8.9 ac.)
    - 18-02-22-00 1303 (7.3 ac.)
    - 18-02-22-00 402 (13 ac.) developed mobile home park
    - 18-02-22-00 1000 (5 ac.)
    - 18-02-22-00 510 (8.8 ac.)
    - 18-02-22-00 511 (6.8 ac.)
    - 18-02-22-00 513 (7.6 ac.)
    - 18-02-22-00 700 (7.1 ac.)
    - 18-02-23-00 2500 (5 ac.)
    - 18-02-23-00 2503 (5 ac.)
    - 18-02-23-00 2401 (6.5 ac.)
    - 18-02-23-00 2402 (6.2 ac.)

    - 18-02-15-00 3400 (9.6 ac.) ODOT
- Floodplain, Class II soil area

18-02-22-00 402

18-02-22-00 513

18-02-22-00 1303

18-02-22-00 700

18-02-15-00 3302

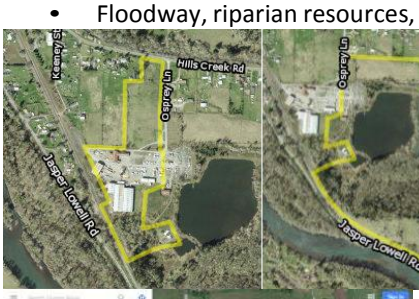
18-02-22-00 510

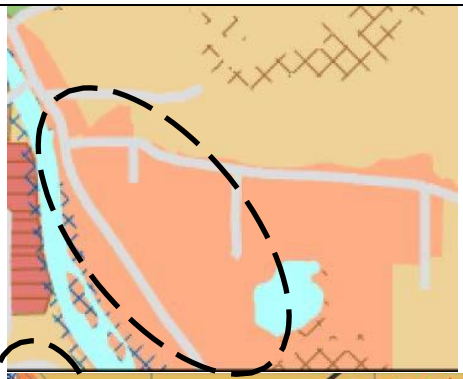
18-02-22-00 511 18-02-22-00 1000 18-02-15-00 3303

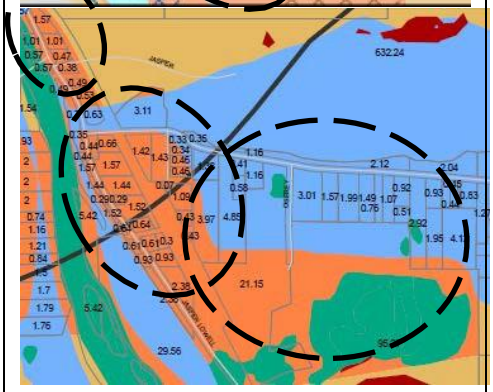
18-02-23-00 2500

Jasper Bridge B[19]

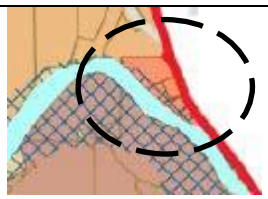
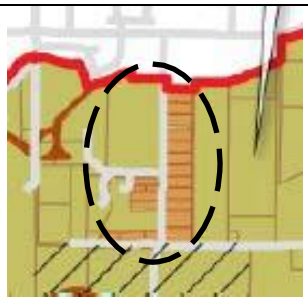
- 1.25 miles SW of UGB via Jasper Lowell Rd., not adjacent to UGB, separated from Springfield by distance and slopes.
- Located east of Jasper Lowell Road, south of Hills Creek Road
- Parcelized small lot Rural Residential between river and Jasper Lowell Road, 0.5 to 1 acre
- RR-5 parcels along south side of Hills Creek Road
- Two Rural Industrial-zoned parcels 18-02-23-00-01800 (20-acre) and 1801 (95 acres) located south of Hills Creek Road via Keeney Street/Osprey Lane are within 1.5 miles of UGB, developed with industrial uses, large ponds occupy 26% of the 95-acre Zola site, large wetland, slopes 10-70% 8% of at south end of site. These parcels are awkwardly shaped but may have additional development capacity if infrastructure and services could be provided:
- 18-02-23-00 TL1800 17 unconstrained acres is developed with industrial use (sawmills and planning mills), wetlands, irregular shape. Northern portion of site (n. of Keeney St.) has 6.4 unconstrained acres, developed with mill office.
- 18-02-23-00 TL1801 33.3 unconstrained acres, ponds, wetlands, slopes > 15% in south half of site, irregular shape. Northern portion of site (n. of Keeney St.) has 10.3 unconstrained acres.
- Floodway, riparian resources, wetlands and slope constraints







[19] See maps in record "Employment Opportunity Area 5/6 Wallis Creek & West Jasper/Jasper Bridge Area – Potential Study Area Evaluation", ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; A & T map 18-02-23-00

West Jasper/Mahogany[20] • Adjacent to UGB • Rural Residential zoning RR-5, all smaller than 5 acres • All parcels have floodway along the Willamette River • Willamette Greenway • Located between Union Pacific railroad line, Bob Straub Parkway southern terminus and Willamette River	
Clearwater[21] • Adjacent to UGB • Located south of Jasper Rd. along Clearwater Lane • Abuts UGB, near City limits, east of 42nd Street • 1-acre rural residential lots are zoned RR, all smaller than 5 acres, and developed with homes; Hedlee Subdivision platted in 1972 with parcel sizes from 0.3 to 1.7 acres.[22] • Land abutting the exception area to the south is Clearwater Park, zoned Park and Recreation	
Seavey Loop[23] **A** • The lands abutting the UGB south of Springfield/Glenwood along Franklin Blvd. are primarily public lands comprising Interstate Highway 5 right of way, and Oregon Dept. of Parks and Recreation public park land. • Land between the Springfield UGB southern extent and the **Seavey Loop A** UGB Study Area Grouping (mapped on A & T maps 18-03-11-00, located along the I-5 onramp, McVay/Franklin intersection and Central Oregon & Pacific rail line (TL700) and 18-03-1010 designated Parks in the LRCP is primarily railroad right of way and thus is not suitable to meet Springfield's employment land needs. • 0.5-0.7 acre exception parcels between UGB and the Franklin/Seavey Loop junction are zoned Rural Commercial and Rural Residential, developed commercial and residential uses, all smaller than 5 acres. • Willamette River Greenway and floodway east of Franklin	\\ Park (green) and Natural Resource-Mineral (gray) designated land south of Springfield UGB (UGB in red) in the vicinity of **Seavey Loop A** UGB Study Area Grouping;[24]showing

[20] See maps in record "Employment Opportunity Area 7 Clearwater Area – Potential Study Area Evaluation", ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; A & T map 18-02-10-00

[21] See maps in record "Employment Opportunity Area 7 Clearwater Area – Potential Study Area Evaluation", ECONorthwest, November 2008 showing exception area parcel sizes and slope constraints; A & T map 18-02-015-00.

[22] Eugene-Springfield Metro Plan 1987 Update, Appendix C List of Exceptions, p. IV-11.

[23] See maps in record "Employment Opportunity Area 9/10 Seavey Loop/Goshen – Potential Study Area Evaluation", ECONorthwest, November 2008 showing exception area parcel sizes and 25% > slope constraints; Map: College View-Seavey Loop Existing Lane County Zoning, and A & T maps of the study area 18-03-11-00, 18-03-11-30, 13-03-14-00

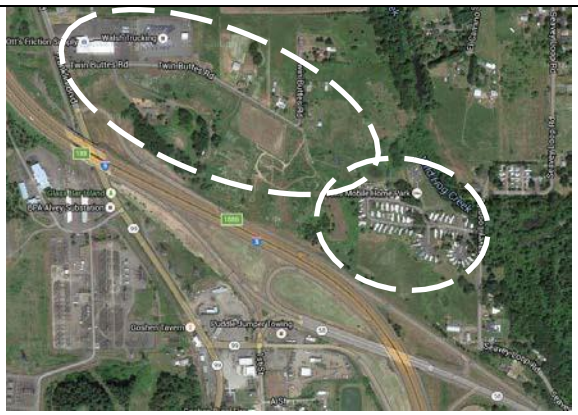
[24] Details from Lane County Plan Map Viewer website accessed Feb. 24, 2016: http://lcmaps.lanecounty.org/LaneCountyMaps/ZoneAndPlanMapsApp/index.html. and as shown in the Official Lane County Plan Maps for Township 17 South, Range 1 West; Township 17 South, Range 2 West; Township 17 South, Range 3 West; Township 18 South, Range 2 West; Township 18 South, Range 3 West; see also maps and other documentation in the record describing the Willamette Confluence Area submitted by Chris Orsinger, President, Friends of Buford Park.

 RC (orange) and RR (yellow) zoning floodway (cross-hatch)	OCPR rail line, I-5 corridor, McVay and Franklin Blvd. and Glass Bar Willamette River Greenway. Park and Natural Resource-Mineral lands are owned by public or non-profit conservation organizations

Seavey Loop B [25]
• Strip of Rural Residential, Rural Commercial and Rural Industrial parcels south of Franklin/Seavey Loop junction along College View Road and west of Franklin/Seavey
• Northern portion of strip between railroad and Franklin is within 1 mile of UGB
• Parcelized 0.2 to 0.7 acre lots, Freeway Park Plat
• Lot depth ranging from 90-200', lot width predominantly 100'
• Developed with commercial and industrial uses that are expected to continue in planning period
• N/S railroad line separates College View parcels from Franklin parcels
• slopes 2-12%, DOGAMI mapped landslide hazards
• Rural Industrial parcels along South Franklin and College View, 0.1-5.6 acres, are developed with commercial and industrial uses, lot depth 200'- 644' (Johnson Crushers developed parcels)
  ○ 18-03-11-30 3500 (5.6 ac.) developed industrial use
  ○ 18-03-11-30 3600 (5.5 ac.) developed industrial use
  ○ 18031400 400; (6 ac.), vacant RI &
  ○ 18031400 900; (0.8 ac.) same owner (split plan des.)
	
	County RR (yellow), RI (red) and RC (orange) zoning
	
	18-03-14-00 400
	
	Southern portion of 18-03-14-00 900

[25] See maps in record "Employment Opportunity Area 9/10 Seavey Loop/Goshen – Potential Study Area Evaluation", ECONorthwest, November 2008 showing exception area parcel sizes and 25% > slope constraints; Map: College View-Seavey Loop Existing Lane County Zoning, and A & T maps of the study area 18-03-11-00, 18-03-11-30, 13-03-14-00

 • The PF- designated area in the vicinity includes the southern portion of the 0.8 acre parcel at the south end of College View Rd. (18-03-14-00 900), the 62-acre US Government parcel (18-03-14-00 700) and adjacent parcels to the west that are developed with Interstate Highway 5 and BPA utilities. The sites owned by the Federal Government (Interstate Highway 5 right of way, and Bonneville Power Administration facilities), and Oregon Dept. of Transportation are unavailable and unsuitable for employment. The City's analysis assumed the PF portion of 18-03-14-00 900 (approximately 0.5 ac.) may be developable in conjunction with the northern portion of the parcel and adjacent parcel 18-03-14-00 400.	has a split plan designation. PF-designated land shown in purple
Seavey Loop C • Exception parcels are 1.5-2 miles from UGB, not adjacent to UGB • Rural Industrial and Rural Residential parcels, along Twin Buttes Road, developed with industrial and residential uses • Slopes > 25% and > 15 % south of Twin Buttes Road, DOGAMI mapped landslide hazards • Very restrictive Bonneville Power line easement along south side of Twin Buttes Road (mapped in yellow) - no structures permitted • Middle Fork Willamette River floodway constraint • Oxley Slough/Wild Hog Creek, floodway, hydric soils, • Freeway access to south via Goshen and Highway 58 • Larger 2-6 acre RR parcels on north side of Twin Buttes road may have development potential. • 15-ac RR-5 parcel is developed with mobile home park	



Access to I-5 from S. Franklin is via Hwy 99 and Hwy 58

- 18-03-14-40 502 (5.6 ac.), RR developed residential use
- 18-03-14-40 600 (2 ac), RR and 700 (4 ac.), RI 701 (2.7 ac.), 800 (0.5 ac.), RI, 900 (0.5 ac.), RI developed industrial use: Walsh Trucking
- 18-03-14-40 300 (2.4 ac.), RR developed residential use, BPA and riparian constraint
- 18-03-14-40 508 5.2 constrained by BPA, slopes
- 18-03-14-40 200 (4.7) riparian constraint
- 18-03-13-30 1701 (15.2 ac.), RR, developed Dunker Mobile Home Park, BPA, floodway, wetland and riparian constraints
- 18-03-13-30 1702 (5 ac.), RR, Dunker, vacant
- 18-03-13-30 1600 (1.2 ac.), 1602 (1.1 ac.) and 1700 (2.8) Flynn = 5.1 ac.

18-03-14-40 700

18-03-14-40 300

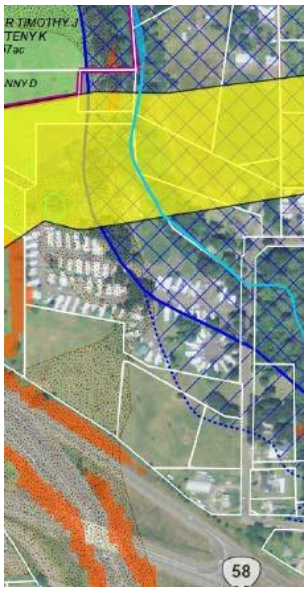
18-03-14-40 508

18-03-13-30 1702

18-03-13-30 1700

18-03-14-40 502

18-03-13-30 1701



Floodway and BPA constraints

Seavey Loop D

- Designated and zoned Rural Public Facility and developed with the Emerald People's Utility District (EPUD) Headquarters. This use will continue through the planning period and thus the site is not suitable to meet Springfield's employment land needs.

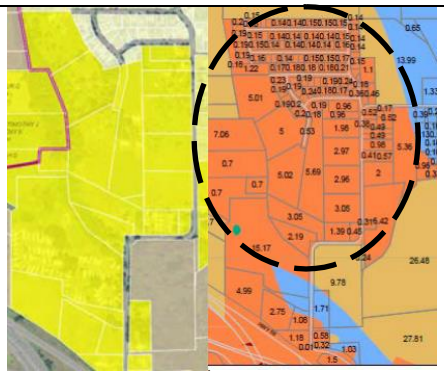
Seavey Loop E

- RR parcels north and south sides of Seavey Loop Rd., range in size from 0.65 to 9.75 acres, most are within the floodway and are developed with rural homes
- Adjacent to Willamette River Confluence Greenway area (Nature Conservancy and Friends of Buford Park lands)
- RI parcel Friends of Buford Park (TL 3802)
- RR-5 parcels south of Seavey Loop Rd, along Franklin range in size from 0.5 to 6.8 acres, mostly developed with rural homes and rural businesses:
  - 18-03-14-10 700 (6.5 ac.)
  - 18-03-14-10 900 (7.6 ac.)
  - 18-03-14-10 301 (6.9 ac.)
  - 18-03-14-10 1201 (6.8 ac.)
- Some slopes >15%
- Berkshire and Oxley Sloughs

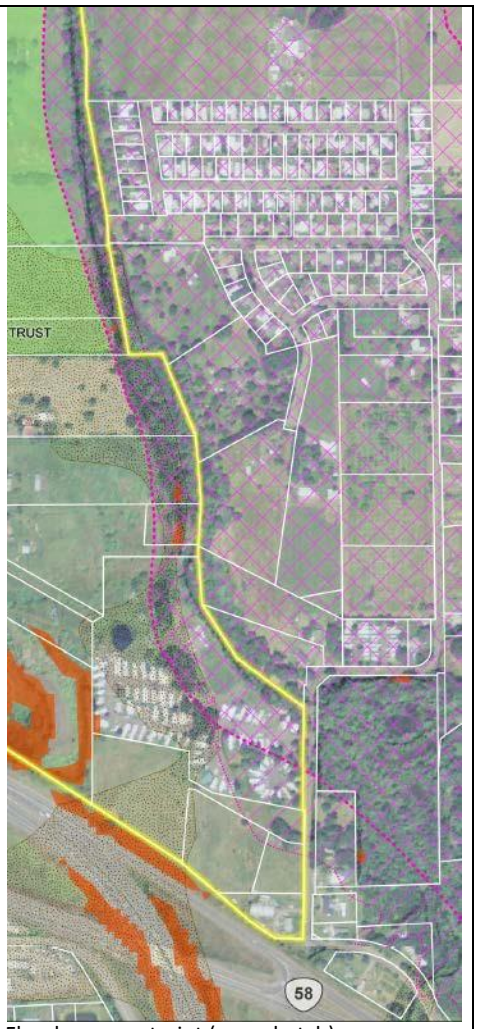
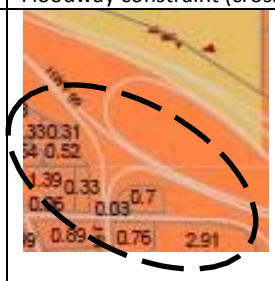
  - 18-03-11-30 3900, (3.1 ac.) slopes and Berkshire Slough
  - 18-03-10-10 1600, (3.8 ac.) same owner

Seavey Loop F[26]

- RR-1 parcels south Seavey Loop Rd., east of Oxley Slough, are developed with homes at urban densities
- RR-5 parcels Starlite Plat
- Adjacent large resource land parcels to SE are Class II prime farmland, zoned for Exclusive Farm Use
- restrictive BPA easement restricts development of structures
- 18-03-13-30 RR-zoned parcels in Exception area F are all in the floodway
- 0 unconstrained 5 + acre parcels



[26] See maps in record A & T map 18-03-13-30, 18-03-13-23

	 Floodway constraint (cross-hatch)
Seavey Loop/Goshen[27] • Lands located south of I-5 are included in Lane County's GREAT Plan Goal Exception: Glendora Tracts Rural Commercial developed interchange area • US Gov't Bonneville Power (BPA) Alvey Substation, development and restrictive easement –lands are designated and zoned Public Facility in LRCP. • Lands located south of I-5 and Highway 99 are included in Lane County's GREAT Plan Goal Exception. Community of Goshen exception land is located more than 1.75 miles south of UGB. • No parcels 5-acres or larger	

[27] See maps in record A & T map 18-03-14-44, 18-03-14-44

18-03-14-00 700 US Gov't land BPA

PF-designated land in **Seavey Loop/Goshen** area shown in purple

The following summary in Table 3 identifies the general geographic groupings containing *potentially* suitable second priority parcels after excluding constrained portions of parcels and parcels smaller than 5 acres.

Table 3: Summary of Second Priority Exception Lands Parcels and Constraints Analysis - Unconstrained Parcels 5 Acres and Larger *

Area	# of parcels 5+ ac adjacent to UGB	# of parcels 20+ ac *	# of parcels 5+ ac*	Parcels and unconstrained acres	Zoning
McKenzie View A	0	0	0		
McKenzie View B	0	0	2	17-02-19-00 3000; (6.7 ac) 17-02-19-00 3100; (5 ac.)	RR RR
Mohawk A	1	0	1	17-02-20-00 202; (5.3 ac)	RR
Mohawk B	0	0	4	17-02-17-00 1500; (5.7 ac., vacant) 17-02-17-00 1600; (5.4 ac.) 17-02-17-00 1309; (7 ac.) 17-02-17-00 1313; (18.3 Jasper Mt. Safe Center)	RI RR5 RR5 RR5
Mohawk C	0	0	6	17-02-08-00 0515; (8.7 ac.) 17-02-08-00 0516; (6.7 ac.) 17-02-08-00 0517; (6 ac.) 17-02-08-00 0600; (5.8 ac.) 17-02-08-00 0700; (5.7 ac.) 17-02-08-00 0701; (5.5 ac.)	RR5 RR5 RR5 RR5 RR5 RR5

Oxbow/Camp Creek	0	0	35	17-02-29-00 800; (5.6 ac.) 17-02-21-00 107; (6.1 ac.) 17-02-21-00 113; (6 ac.) 17-02-21-00 128; (5.5 ac.) 17-02-21-00 129; (6.6 ac.) 17-02-21-00 801; (5 ac.) 17-02-21-00 802; (5 ac.) 17-02-22-00 500; (5 ac.) 17-02-22-00 600; (5 ac.) 17-02-26-00 704; (5.1 ac.) 17-02-26-00 2100; (6.6 ac., vacant) 17-02-25-00 1101; (8.1 ac.) 17-02-25-00 1103; (7.7 ac.) 17-02-25-00 1205; (10.4 ac.) 17-02-25-00 2600; (6.9 ac.) 17-02-24-00- 100; (7.8 ac.) 17-02-24-00- 134; (5.6 ac.) 17-02-24-00- 136; (8 ac.) 17-02-24-00 138; (8.1 ac.) 17-02-24-00 141; (4.9 ac.) 17-02-24-00 143; (6.9 ac.) 17-02-24-00 144; (5.0 ac.) 17-02-24-00 200; (6.8 ac.) 17-02-24-00 303; (5.0 ac.) 17-02-24-00 304; (5.0 ac.) 17-02-24-00 306; (5.0 ac.) 17-02-24-00 311; (5.0 ac.) 17-02-24-00312; (5.0 ac.) 17-02-24-00 313; (5.0 ac.) 17-02-24-00 1209; (11.6 ac.) 17-02-24-00 1400; (12.0 ac.) 17-02-24-00 1402; (7.7 ac.) 17-02-24-00 1501; (5.6 ac.) 17-02-21-00 101; (19.7 ac.) 17-02-16-00 600; (11 ac.)	RR5NRES RR5 RR5 RR5 RR5 RR5 RR5 RR5 RR5 RR5 RR RR RR RR RR RR RR RR10 RR RR RR RR RR RR RR RR RR RR RR RR RR RR RR RR5NRES RR5NRES
Far East A	2	0	2	1702362401500; 6.4 acres 1701312001500; 6.95 acre slopes <15%, developed residential use, *entire property is sloped >12%	RR RR
Far East B	0	0	4	1701322002800; 5.4 ac 1701322002801(same owner);7.8 ac 1701322002301; 5.9 ac. 17013220026401; 5 ac.	RR
Wallace Creek	0	0	8	upper Wallace Creek parcels contain 5.3 to 8.9 unconstrained acres, developed with rural dwellings 18-02-11-00 1401; (5.8 ac.), slopes 12-45%) 18-02-11-00 1200; (6.2 ac.), slopes 12-45%) 18-02-12-00 603; (5.3 ac.) 18-02-12-00 604; (6.4 ac.)	RR

				18-02-12-00 605; (7.7 ac.) 18-02-12-00 606; (6.4 ac.) 18-02-12-00 615; (7.4 ac.) 18-02-12-00 619; (8.9 ac.)	
Jasper Bridge A	0	0	14	all have homes and are surrounded by smaller residential parcels 18-02-15-00 3302; (9.6 ac.) 18-02-15-00 3303; (5 ac.) 18-02-22-00 2100; (8.9 ac.) 18-02-22-00 1303; (7.3 ac.) 18-02-22-00 402; (13 ac.) developed mobile home park 18-02-22-00 1000; (5 ac.) 18-02-22-00 510; (8.8 ac.) 18-02-22-00 511; (6.8 ac.) 18-02-22-00 513; (7.6 ac.) 18-02-22-00 700; (7.1 ac.) 18-02-23-00 2500; (5 ac.) 18-02-23-00 2503; (5 ac.) 18-02-23-00 2401; (6.5 ac.) 18-02-23-00 2402; (6.2 ac.)	
Jasper Bridge B	0	1** PREDEV	1** PREDEV	18-02-23-00 TL1800; 17 acres is developed with industrial use that likely will continue through planning period. Portion of parcel n. of Keeney Street may have development potential but it abuts rural residential uses along Hills Creek Rd. 18-02-23-00 1801; 33.3 acres. 10 ac. portion of parcel n. of Keeney Street may have development potential but it abuts rural residential uses along Hills Creek Rd.	RI RI
West Jasper/ Mahogany	0	0	0		
Clearwater	0	0	0		
Seavey Loop A	0	0	0		
Seavey Loop B	0	0	1	Developed industrial use (Johnson Crushers) will likely continue through planning period. 18031400 400; (6 ac.), vacant	RI
Seavey Loop C	0	0	3	18-03-14-40 502; (5.6 ac.) 18-03-13-30 1702; (5 ac.) vacant 18-03-13-30 1600, 1602, 1700; (5.1 ac. combined)	RR
Seavey Loop D	0	0	0	Developed Rural Public Facility (EPUD)	RPF
Seavey Loop E	0	0	4	18-03-14-10 700; (6.5 ac.) 18-03-14-10 900; (7.6 ac.) 18-03-14-10 301; (6.9 ac.) 18-03-14-10 1201; (6.8 ac.)	RI RR

Seavey Loop F	0	0	0	RR-1 parcels south Seavey Loop Rd., east of Oxley Slough, are developed with residential use at urban densities RR-5 parcels Starlite Plat All in floodway	RR
Seavey Loop/Goshen	0	0	0		

* No deduction for existing residential development on parcels was made by City

** PREDEV= Potentially redevelopable rural industrial parcel considered by City. Land in the UGB Study Area with redevelopment potential is land that is classified as "developed" that may redevelop during the planning period to increase employment capacity in Springfield, consistent with the Goal 9 definition of redevelopment. As described in the preceding text and graphics, the City identified and evaluated several developed exception land sites larger than 5 acres on a site-by-site basis and determined that except where identified in Table 3, these sites are unlikely to redevelop over the 20-year planning period to meet Springfield's specific employment land needs for sites larger than 5 acres. The City's reasoning for this evaluation of alternatives was based on the presence of existing businesses or residential development on the site that are expected to continue to use the site for the planning period; physical absolute constraints that diminish the amount and site configuration of potentially redevelopable areas; and parcel sizes and configurations that result in potentially redevelopable areas smaller than five acres.

As shown in Table 3, the City's initial screening identified a total of (72) second priority exception land parcels* 5 acres or larger in the vicinity of the UGB that *may* have potential to satisfy the identified need deficiency based solely on their parcel acreage and lack of absolute development constraints. These parcels are located within 13 study area groupings and within 8 different geographic areas.

As shown in Table 3, the City's initial screening identified (3) parcels 5 acres or larger, a total of 18.6 acres of second priority exception land are located adjacent to the UGB. These parcels are located within 2 study area groupings and within 2 different geographic areas. The adjacent parcels are not contiguous to one another, and one of the parcels is sloped 12-15%, too steep for industrial uses and commercial mixed-use development.

EXCLUDE SECOND PRIORITY EXCEPTION LANDS LACKING THE SPECIFIED CHARACTERISTICS TO MEET THE IDENTIFIED EMPLOYMENT LAND NEED

The next step in the process excluded the second priority lands that are *not* potentially suitable to provide unconstrained parcels larger than 5 acres to satisfy the identified employment land need deficiency. The City's reasoning at this stage in the analysis was based on parcel size, ownership and presence of absolute development constraints on a parcel or grouping of adjacent parcels under single ownership.

OAR 660-024-0060 (1)(e)

> *"For purposes of this rule, the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under section (5) of this rule, as well as other provisions of law applicable in determining whether land is buildable or suitable."*[emphasis added]

OAR660-024-0060(5)

> *"If a local government has specified characteristics such as parcel size, topography, or proximity that are necessary for land to be suitable for an identified need, the local government may limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298."* [emphasis added]

Identification of Potentially Suitable Exception and Non-resource Land. As previously explained in the City's findings under Goal 9, the CIBL/EOA [28] provides a determination of the amount and type of land needed in the UGB amendment to accommodate Springfield's employment land needs for 2010-2030, and OAR 660-009-0005 states that "the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under Section (5), as wells as other provisions of law applicable in determining whether land is buildable or suitable."

To identify *potentially* suitable exception land sites to meet employment land needs, the City applied the following factors[29] (from an outline provided by DLCD Staff Gordon Howard) to exclude or include exception lands in the next stage of the evaluation process:

- Exclude lands that are not buildable[30]
- Exclude lands based upon specific land needs (197.298(3)(a))

In the previous step in the alternatives analysis, the City identified exception land parcels that could *potentially* be suitable to meet the City's need for employment land sites larger than 5 acres and sites larger than 20 acres. This step excluded parcels or portions of parcels with absolute development constraints, and excluded exception land with pre-existing development and parcelization patterns that limit the suitability of lands for use as future employment sites. For example, the City considered that 5.5 and 5.6 acre parcels in Preliminary Study Area grouping Seavey Loop B that are developed with the Johnson Crushers International plant to be developed with an industrial use expected to continue in the

[28] CIBL/EOA Table S-5, page ix-x.

[30] "Buildable" is a Goal 10 term. It is the City's position that OAR 660-024-0060 (1) requires the City to consider whether sites are "suitable" at this "buildable" stage in the evaluation process.

planning period thus not suitable to meet the City's need for employment land sites larger than 5 acres and sites larger than 20 acres in the planning period.

For the purpose of evaluating second priority exception land, the City identified the following criteria to be applied equally to all parcels within the Preliminary Study Area — in order of their priority under ORS 197.298— to determine whether a parcel of land or group of parcels is potentially suitable to meet employment land needs.

Parcel size is a key factor because Springfield's land need in the UGB expansion is for sites larger than 5 acres, with some needed sites larger than 20 acres. The City identified parcels 5 acres or larger as potentially suitable to meet employment land needs, and excluded parcels or portions of parcels less than 5 acres from further analysis. For the purpose of this step in the analysis, the City did not deduct for existing residential development on parcels 5 acres or larger.

Topography is a key factor in determining suitability because Springfield's land need is for industrial and commercial mixed use sites with relatively flat topography (less than 5% slope and less than 7% slope).

As explained in the City's findings under Goal 9 and in the CIBL/EOA, distance relative to the City and to existing urban infrastructure systems is a key factor in determining employment land suitability because Springfield's identified land need is for industrial and commercial mixed use sites that provide reasonable access and travel times to major transportation corridors and reasonable service connections to public water and wastewater conveyance systems, public transit service, and public stormwater and wastewater management systems, facilities and services. Employment sites must also have reasonable connection to electricity and telecommunications systems.

As previously explained, the City applied the following factors as absolute development constraints to providing urban services to employment land:

- Portions of tax lots with slopes>15%
- Portions of tax lots comprising inventoried wetlands
- Portions of tax lots within the floodway
- Portions of tax lots comprising riparian resource areas

The City excluded portions of parcels constrained by floodway, inventoried wetlands, and riparian resources when it analyzed the suitable acreage of a parcel or group of parcels. As these factors preclude or place limitations on whether a parcel is buildable for urban development, they subsequently preclude or place limitations on the suitability of land to accommodate the need deficiency determined under OAR 660-024-0050.

For the initial screening of land, the City identified parcels or portions of parcels with slopes 15% or less as *potentially* suitable to meet employment land needs, and excluded parcels or portions of parcels with slopes greater than 15% from further analysis.

The City's findings describe or map all of the alternative areas evaluated in the boundary location alternatives analysis as required by OAR 660-024-0060(6). The City's analysis involves more than one parcel or area within a particular priority category in ORS 197.298 for which circumstances are the same. As permitted under OAR 660-024-0060(6), the City is allowed to consider and evaluate those parcels or areas as a single group. The City analyzed parcels within a priority category by geographic groupings as permitted under OAR 660-024-0060(6).

In addition to the summary data compiled in Map 1,Table 2 and Table 3, the record includes maps, acreage calculations and other evidence used as factual basis for the City's uniform and consistent evaluation of parcelization, slopes, floodway, inventoried wetlands and riparian resources on all exception parcels in the preliminary study area. This evidence is relevant to justify the City's identification of *potentially* suitable second priority exception land parcels and its exclusion of unsuitable second priority exception land parcels from further analysis.

ORS 197.298 (1)(b):

> *"Second priority may include resource land that is completely surrounded by exception areas unless such resource land is high-value farmland as described in ORS 215.710 (High-value farmland description for ORS 215.705)."*

To complete its evaluation of second priority land, the City examined the study area to identify resource land areas that are completely surrounded by exception areas unless such resource land is high-value farmland as described in ORS 215.710 (High-value farmland description for ORS 215.705). One area meeting this description exists within the UGB Study Area.

One tract of resource land (zoned EFU) in the Seavey Loop area meets the criteria for second priority: 18031440 tax lots 501, 504 and 506. As shown in the figure below, this tract is constrained by slopes and very restrictive BPA easements and was excluded from consideration.

18031440 501, 504 and 505

Slopes constraints and BPA easement Cl VI soils and slopes>15%

EXCLUDE LANDS THAT ARE NOT BUILDBLE (SUITABLE), BASED UPON SPECIFIC LAND NEEDS [ORS 197.298(3)(a)]

This section of the report provides explanation and evidence to support the City's findings addressing ORS 197.298(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060 (1)(c), OAR 660-024-0060(1)(d),OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c).

As described in the preceding text and graphics, the City excluded exception land parcels less than 5 acres in size and portions of parcels with absolute development constraints (slopes >15%, floodway, inventoried wetlands, waterways, and riparian resources) when it analyzed the potentially suitable acreage of each exception land parcel or group of parcels, as permitted under OAR 660-024-0060(5).

OAR 660-024-0060(1)(e)

> *"For purposes of this rule, the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under section (5) of this rule, as well as other provisions of law applicable in determining whether land is buildable or suitable."*

OAR 660-024-0060(5)

> *"If a local government has specified characteristics such as parcel size, topography, or proximity that are necessary for land to be suitable for an identified need, the local government may limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298."*

As described and shown in the preceding text and graphics, and as verified by supporting evidence (parcel maps data and GIS maps) in the record, the City applied characteristics of parcel size, topography, and absolute development constraints (floodway, wetlands, riparian resources) to all second priority exception land parcels in the UGB Study Area to identify potentially suitable land to meet the employment land need, when it conducted the boundary location alternatives analysis and applied ORS 197.298. [OAR 660-024-0060(1)(e) and OAR 660-024-0060 (5)] .

These steps excluded the McKenzie View A, West Jasper/Mahogany, Clearwater, Seavey Loop A, D, F, and Seavey Loop/Goshen exception parcels from further consideration.

After excluding the McKenzie View A, West Jasper/Mahogany, Clearwater, Seavey Loop A, D, F, and Seavey Loop/Goshen exception parcels, the City's analysis of parcel size and absolute development constraints identified the seven remaining exception area geographic groupings that contain *potentially* suitable land. These areas were identified for additional analysis study to determine serviceability and

suitability to determine whether exception lands in the vicinity of the UGB can "reasonably accommodate" the identified employment land need.

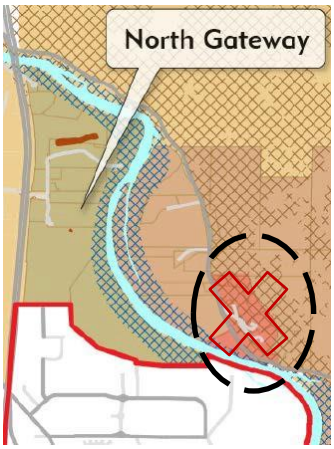
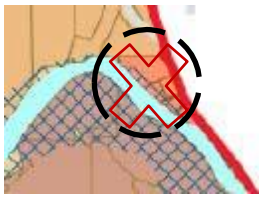
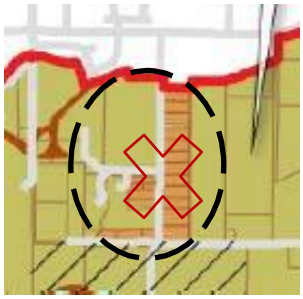
No exception area will provide a vacant candidate site with 20 or more unconstrained acres to meet Springfield's industrial and commercial mixed-use employment land needs.

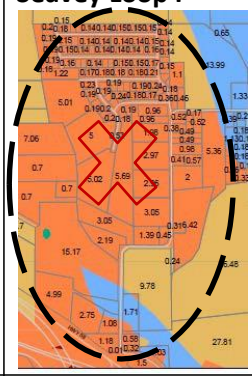
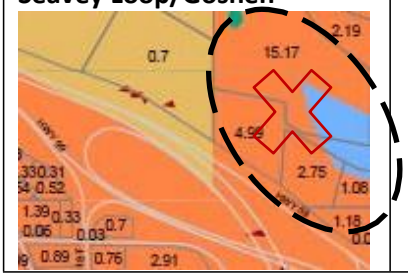
The City's need for 186 acres to accommodate sites 20 acres and larger cannot be met by adding exception lands to the UGB.

The City identified the exception land parcels listed in Table 3, Summary of Second Priority Exception and Non-Resource Parcels and Constraints Analysis as candidate lands for additional analysis to determine serviceability and suitability to meet the need for 37 acres to accommodate smaller 5-20 acre sites.

The McKenzie View A, West Jasper/Mahogany, Clearwater, Seavey Loop A, D, F and Seavey Loop/Goshen exception parcels with less than 5 unconstrained acres were excluded from further analysis.

Table 4: Second priority exception parcels excluded based upon specific land needs [ORS 197.298(3)(a)]

McKenzie View A	West Jasper/Mahogany	Clearwater
		

Seavey Loop A	**Seavey Loop D**	**Seavey Loop F** 
Seavey Loop/Goshen 		

IDENTIFY SECOND PRIORITY EXCEPTION LANDS WITH THE SPECIFIED CHARACTERISTICS TO MEET THE IDENTIFIED EMPLOYMENT LAND NEED TO INCLUDE IN THE UGB

In the next step, the City conducted a public facilities and services analysis to determine whether the *potentially* suitable exception parcels identified in the previous step could reasonably be provided with the public water, sewer, stormwater and transportation facilities needed to serve industrial and commercial mixed use employment uses within the 2010-2030 planning period and thus be considered suitable candidate lands to accommodate the identified employment land need deficiency determined under OAR 660-024-0050.

The following section of this report provides explanation of the City's rationale and evaluation criteria for comparing serviceability and suitability of candidate lands.

The following section of this report provides substantial evidence to support the City's findings under Goals 11 and 12.

OAR 660-024-0010(8) Definitions states:

> *"Suitable vacant and developed land" describes land for employment opportunities, and has the same meaning as provided in OAR 660-009-0005 section (1) for "developed land," section (12) for "suitable," and section (14) for "vacant land."*

OAR 660-024-0040(7) states:

> *"The determination of 20-year land needs for transportation and public facilities for an urban area must comply with applicable requirements of Goals 11 and 12, rules in OAR chapter 660, divisions 11 and 12, and public facilities requirements in ORS 197.712 and 197.768."*

For land to be "suitable" for industrial and other employment use under OAR 660-009-0005(12) it must be "serviceable." OAR 660-009-0005(9) states that "'Serviceable' means a city or county has determined that public facilities and transportation facilities, as defined by OAR chapter 660, division 11 and division 12, currently have adequate capacity for development planned in the service area where the site is located or can be upgraded to have adequate capacity within the 20-year planning period."

OAR 660-011-0005(5) defines "Public Facility":

> *"A public facility includes water, sewer, and transportation facilities, but does not include buildings, structures or equipment incidental to the direct operation of those facilities."*

As explained in greater depth in the City's findings under Goal 11, OAR Division 11 requires public facilities planning:

> *"to help assure that urban development in such urban growth boundaries is guided and supported by types and levels of urban facilities and services appropriate for the needs and requirements of the urban areas to be serviced, and that those facilities and services are provided in a timely, orderly and efficient arrangement, as required by Goal 11."*[OAR 660-011-0000]

Goal 11 requires public facilities to be planned to support types and levels of urban facilities and services appropriate for Springfield's needs and requirements, consistent with the comprehensive plan. Springfield's need is for the types and levels of public facilities and services appropriate and necessary to support the needs of urban industrial and commercial uses generally and manufacturing and office employment sites specifically.[31] Goal 11 requires public facilities and services to be provided "*in a timely, orderly and efficient arrangement."* Goal 14 requires cities to evaluate changes to their UGB considering "*orderly and economic provision of public facilities and services."*

As explained in greater detail in the City's findings under Goal 11, the City relied primarily on the 2035 TSP, the policies and findings of the acknowledged Metro Plan Public Facilities and Services Element, the *Eugene-Springfield Metropolitan Area Public Facilities and Services Plan,* the Springfield Wastewater and Stormwater facilities master plans, and Springfield Utility Board facilities plans as the primary data sources to assess and compare the public facilities needs to serve candidate expansion lands in a timely, orderly, and efficient arrangement. The City relied primarily on those same data sources and interviews with County and City planning staff when it determined that public facilities and transportation facilities

[31] Springfield's Target Industries are listed and explained in detail in the CIBL/EOA.

— as defined by OAR chapter 660, division 11 — currently have adequate capacity for development planned in the service area where the candidate UGB expansion site is located or can be upgraded to have adequate capacity within the 20-year planning period to serve candidate expansion lands in a timely, orderly and efficient arrangement consistent with OAR chapter 660, divisions 11. The City did this by conducting an iterative series of meetings with City and service provider agency engineering and transportation planning staff over a multi-year period to examine the nearest location and capacity of existing and planned public facilities in the vicinity of a candidate parcel or grouping of parcels and by considering possible ways and means of connecting candidate lands to facilities and services in accord with applicable provisions of the law.

OAR 660-012-0005(30) defines "Transportation Facilities":

> *"Transportation Facilities means any physical facility that moves or assists in the movement of people or goods including facilities identified in OAR 660-012-0020 but excluding electricity, sewage and water systems."*

OAR 660-012-0020 states "TSPs shall establish a coordinated network of transportation facilities adequate to serve state, regional and local transportation needs;" and lists the elements that must be included in the required Transportation Systems Plans (TSPs). TSPs must establish "a system of planned transportation facilities, services and major improvements. The system shall include a description of the type or functional classification of planned facilities and services and their planned capacities and performance standards;" [OAR 660-012-0020 (3)(b)]. The TSP must describe the "location of planned facilities, services and major improvements, establishing the general corridor within which the facilities, services or improvements may be sited. This shall include a map showing the general location of proposed transportation improvements, a description of facility parameters such as minimum and maximum road right of way width and the number and size of lanes, and any other additional description that is appropriate;" [OAR 660-012-0020 (3)(c)].

OAR 660-012-0025(1)

> *"Except as provided in section (3) of this rule, adoption of a TSP shall constitute the land use decision regarding the need for transportation facilities, services and major improvements and their function, mode, and general location."*

OAR 660-012-0030 Determination of Transportation Needs

> *(1) The TSP shall identify transportation needs relevant to the planning area and the scale of the transportation network being planned including:*
>
> > *(a) State, regional, and local transportation needs;*
> > *(b) Needs of the transportation disadvantaged;*
> > *(c) Needs for movement of goods and services to support industrial and commercial development planned for pursuant to OAR chapter 660, division 9 and Goal 9 (Economic Development).*

The City properly relied on the acknowledged 2035 Springfield TSP, the Lane County TSP and the Central Lane MPO RTP (as described in the City's findings under Goal 12) as the primary data sources to assess and compare the need for transportation facilities, services and major improvements that would be associated with the urbanization of candidate expansion lands when it conducted the UGB Alternatives Analysis. The TSPs describe the location of existing and planned transportation facilities, services and major improvements, establishing the general corridor within which the facilities, services or improvements may be sited. The City relied primarily on those same data sources and interviews with ODOT, County, City and Lane Transit District transportation planning staff when it determined that public facilities and transportation facilities — as defined by OAR chapter 660, division 12 — currently have adequate capacity for development planned in the service area where the candidate UGB expansion site is located or can be upgraded to have adequate capacity within the 20-year planning period consistent with OAR chapter 660, division 12.

Requirements under OAR chapter 660, division must be considered at this stage in the UGB Alternatives Analysis to ensure that the amendment of the comprehensive plan to add urbanizable lands to the UGB is supported by adequate planned transportation facilities in a manner that is consistent with applicable transportation planning requirements in OAR chapter 660, division 12. The City is expanding the UGB to designate suitable land for industrial and commercial development, therefore suitable candidate lands added to the UGB must provide for the relevant transportation needs: movement of goods and services to support industrial and commercial development planned for pursuant to OAR chapter 660, division 9 and Goal 9 (Economic Development);[OAR 660-012-0030 (1)(c)] and movement of workforce employees to and from the workplace, including needs of the transportation disadvantaged. The City seeks to add employment sites that are reasonably accessible to Interstate Highway 5 via designated freight routes to meet site needs of target industries. The City also seeks to add employment sites in locations that are accessible or can reasonably be made accessible via transit.

OAR 660-012-0005(22)

> *"Planning Period" means the twenty-year period beginning with the date of adoption of a TSP to meet the requirements of this rule."*

It should be noted that the 2030 Plan planning period is 2010-2030. The Springfield TSP planning period extends to the year 2035.

OAR 660-012-0005(24)

> *""Reasonably direct" means either a route that does not deviate unnecessarily from a straight line or a route that does not involve a significant amount of out-of-direction travel for likely users."*

The definition of "reasonably direct" is relevant and appropriate to the UGB Alternatives Analysis because "reasonably direct" travel routes are important location factors for Springfield's target manufacturing uses.[32]

OAR 660-012-0005(32)

> *""Transportation Needs" means estimates of the movement of people and goods consistent with acknowledged comprehensive plan and the requirements of this rule. Needs are typically based on projections of future travel demand resulting from a continuation of current trends as modified by policy objectives, including those expressed in Goal 12 and this rule, especially those for avoiding principal reliance on any one mode of transportation."*

To assess the types and levels of transportation needs associated with the industrial and commercial employment land UGB expansion, and to compare the relative advantages and disadvantages of candidate sites, the City assumed that those needs would be a continuation of current trends for similar industrial and commercial office employment uses as modified by policy objectives in the TSP, and applicable 2030 Comprehensive Plan Economic and Urbanization Element policies.

The transportation system must "minimize adverse economic, social, environmental and energy consequences; [OAR 660-012-0035(3)(c)], "minimize conflicts and facilitate connections between modes of transportation;" and "avoid principal reliance on any one mode of transportation by increasing transportation choices to reduce principal reliance on the automobile."

OAR 660-012-0035 Evaluation and Selection of Transportation System Alternatives

Requirements under OAR chapter 660, division must be considered at this stage in the UGB Alternatives Analysis to ensure that the amendment of the comprehensive plan to add urbanizable lands to the UGB is supported by adequate planned transportation facilities in a manner that is consistent with applicable transportation planning requirements in OAR chapter 660, division 12. Just as the TSP must "evaluate potential impacts of system alternatives that can reasonably be expected to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology;"[OAR 660-012-0035] the City's UGB study carefully examined and compared alternative candidate growth areas to determine which alternative(s) can reasonably be expected to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology."

The transportation system must "support urban development by providing types and levels of transportation facilities and services appropriate to serve the land uses identified in the acknowledged comprehensive plan." [OAR 660-012-0035(3)(a)]. The City is expanding the UGB to designate suitable, serviceable land for industrial and commercial development, therefore suitable candidate lands added to the UGB must be located where the relevant transportation needs associated with those needed

[32] See TadZo report

employment land uses can reasonably be provided within the planning period: movement of goods and services to support the industrial and commercial employment development planned for pursuant to OAR chapter 660, division 9 and Goal 9 (Economic Development), and movement of workforce employees to and from the workplace, including needs of the transportation disadvantaged. [OAR 660-012- 0030(1)(b)]

The City evaluated alternative candidate lands to consider the advantages and disadvantages of moving goods and service, workforce employees, including needs of the transportation disadvantaged via the existing and planned transportation system to minimize adverse economic, social, environmental and energy consequences. [OAR 660-012-0035(3)(c)]. The City accomplished this by measuring and comparing distance to candidate sites via existing and planned routes.

OAR 660-012-0005(41) Vehicle Miles of Travel (VMT)

> *"Vehicle Miles of Travel (VMT): means automobile vehicle miles of travel. Automobiles, for purposes of this definition, include automobiles, light trucks, and other similar vehicles used for movement of people. The definition does not include buses, heavy trucks and trips that involve commercial movement of goods. VMT includes trips with an origin and a destination within the MPO boundary and excludes pass through trips (i.e., trips with a beginning and end point outside of the MPO) and external trips (i.e., trips with a beginning or end point outside of the MPO boundary). VMT is estimated prospectively through the use of metropolitan area transportation models."*

To address OAR 660-012-0005 (41) *"Vehicle Miles of Travel (VMT),* the City considered the VMT advantages and disadvantages of moving goods and service, workforce employees, including needs of the transportation disadvantaged via the existing and planned transportation system [OAR 660-012-0005(41)]when it evaluated alternative candidate lands. The City accomplished this by measuring and compared distance to candidate sites via existing and planned routes, assuming build out of the planned transportation system. This is to germane to the evaluation of serviceability because urban transit service is required for a city of Springfield's size, to ensure that new jobs can be accessible to that transportation disadvantaged and as an important means to reducing VMT. Thus, ability to reasonably provide public transit service to new urban areas is a critical and necessary component of serviceability in this case. The City, in consultation with Lane Transit District staff, considered whether extending public transit service to candidate expansion areas can reasonably be expected to be feasible to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology.

To further evaluate potentially suitable exception and land sites to meet employment land needs, the City applied the following factors (from an outline provided by DLCD Staff Gordon Howard) to exclude or include exception in the next stage of the evaluation process:

- Exclude lands that are not buildable[33]

[33] "Buildable" is a Goal 10 term. It is the City's position that OAR 660-024-0060 (1) requires the City to consider whether sites are "suitable" at this "buildable" stage in the evaluation process.

- Exclude lands based upon specific land needs (197.298(3)(a));
- Exclude lands based upon inability to reasonably provide urban services due to physical constraints (197.298(3)(b));
- Include lower priority lands needed to include or provide services to urban reserve lands (197.298(3)(c));
- Exclude lands based upon analysis of comparative ESEE consequences (Goal 14, Boundary Location, Factor 3);
- Exclude lands based upon analysis of compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4)

OAR 660-024-0060 (1)(e)

> *"For purposes of this rule, the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under section (5) of this rule, as well as other provisions of law applicable in determining whether land is buildable or suitable."*

OAR 660-024-0060(5)

> *"If a local government has specified characteristics such as parcel size, topography, or proximity that are necessary for land to be suitable for an identified need, the local government may limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298."*

For the public facility suitability analysis, the City assumed that the type, size and service levels of public water, wastewater, stormwater facilities and transportation systems needed to serve candidate employment expansion areas are the type, size and service levels needed to serve the target industries identified in the CIBL/EOA, as identified as summarized in this report in the City's findings under Goal 9; as supported by the evidence in the record; and as required under applicable federal, state, regional and local plan policies and environmental permits. Target industries require and rely upon specific types, sizes and service levels of public water, wastewater, stormwater facilities and transportation systems to conduct their operations — including but not limited to necessary and typical proximity to existing public facilities, transportation systems and services. Therefore the City analyzed proximity to existing facilities and systems when it conducted the public facilities analysis summarized in Table 4 Public Facilities Analysis, and excluded lands from further consideration based on necessary and typical proximity when it conducted the boundary location alternatives analysis.

The City properly considered the employment land suitability characteristics regarding the type, size and service levels of public water, wastewater, stormwater facilities and transportation systems needed to serve candidate employment expansion areas, based on the characteristics of needed sites determined in the Economic Opportunities Analysis and supporting evidence in the record.

For the next steps, in the analysis, the City analyzed general geographic groupings of parcels within each priority category as permitted under OAR 660-024-0060(6).

It should be noted that two geographic areas (Mohawk and Wallace Creek) contain second priority exception parcels and third priority marginal parcels. These are discussed separately in order of priority. General geographic groupings comprising disparately located parcels were grouped into subgroups based on their location, relative proximity to the UGB, and relative proximity to potential service connections. For example, Mohawk A, B and C parcels are located increasingly distant from the UGB, with A being the closest.

EXCLUDE LANDS THAT CANNOT REASONABLY BE PROVIDED WITH URBAN INFRASTRUCTURE AND SERVICES DUE TO PHYSICAL CONSTRAINTS [ORS 197.298(3)(b)].

This section of the report provides explanation and evidence to support the City's findings addressing ORS 197.298(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060 (1)(c), OAR 660-024-0060(1)(d),OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c).

As previously explained in the City's findings under Goal 9, the CIBL/EOA [34] provides a determination of the amount and type of land needed in the UGB amendment to accommodate Springfield's employment land needs for 2010-2030, and OAR 660-009-0005 states that "the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under Section (5), as wells as other provisions of law applicable in determining whether land is buildable or suitable." [emphasis added]

OAR 660-009-0005(12) states that "'[s]uitable' means serviceable land designated for industrial or other employment use that provides, or can be expected to provide the appropriate site characteristics for the proposed use."[35] [emphasis added]

OAR 660-009-0005(2)

> *"Development Constraints" means factors that temporarily or permanently limit or prevent the use of land for economic development. Development constraints include, but are not limited to, wetlands, environmentally sensitive areas such as habitat,*

[34] CIBL/EOA Table S-5, page ix.

[35] The Goal 14 rule at OAR 660-024-0010(8) states: "'[s]uitable vacant and developed land' describes land for employment opportunities and has the same meaning as provided in OAR 660-009-0005 section…(12) for 'suitable.'"

environmental contamination, slope, topography, cultural and archeological resources, infrastructure deficiencies, parcel fragmentation, or natural hazard areas. [emphasis added]

OAR 660-009-0005(4)

"Locational Factors" means market factors that affect where a particular type of industrial or other employment use will locate. Locational factors include, but are not limited to, proximity to raw materials, supplies, labor, services, markets, or educational institutions; access to transportation and freight facilities such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes; and workforce factors (e.g., skill level, education, age distribution)." [emphasis added]

OAR 660-009-0005(11)

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

Availability of urban infrastructure and public facilities is identified as a necessary employment land site characteristic in the CIBL/EOA, thus serviceability is a critical site characteristic for determining whether a particular parcel of land is suitable to meet the City's specified employment needs. Specific infrastructure needs for Springfield's target industries are summarized on page 161 and further explained in CIBL/EOA Chapter on pages 82-95 of the CIBL/EOA Characteristics of Needed Sites.

OAR 660-024-0060(8)

OAR 660-024-0060(8) requires evaluation and comparison of the relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services needed to urbanize alternative boundary locations. Part of the OAR 660-024-0060(8) analysis requires the City to determine which lands cannot reasonably be provided with urban services due to physical constraints [ORS 197.298(3)(b)]. To conduct the next step of the boundary alternatives analysis, the City excluded lands that cannot reasonably be provided with public infrastructure, facilities and services due to physical constraints [ORS 197.298(3)(b)]. The City identified the following factors as significant physical constraints to providing the public services necessary to develop employment land sites. As these factors preclude or place limitations on serviceability, they subsequently preclude or place limitations on the suitability of land to accommodate the need deficiency determined under OAR 660-024-0050:

- Physical separation from existing water and wastewater service mains by the McKenzie or Willamette River

- Physical separation by distance to existing or planned public facilities, service connections and service areas
- Slopes as identified in the CIBL/EOA: 5% of less for Manufacturing, 7% or less for High Tech and Campus Manufacturing
- Topographic, geographic or geological constraints that physically preclude or significantly impede the feasible construction of functioning gravity flow systems.
- Topographic, geographic or geological constraints that physically preclude or significantly impede the feasible connection of employment sites to Federal or State truck routes. As identified in the CIBL/EOA, "most businesses in Springfield typically locate within one mile of Interstate Highway 5 or ½ mile of a state highway."
- Topographic, geographic or geological constraints that physically preclude or significantly impede construction of an interconnected transportation system, including the provision of transit service and accessible, multi-modal access to employment sites
- Stormwater basin capacity constraints, including legal or environmental policy constraints that prohibit wastewater or stormwater discharges within a specific basin, geographic area or river reach.
- Wastewater system capacity constraint, including legal or environmental policy constraints that prohibit wastewater or stormwater discharges within a specific basin, geographic area or river reach.

Others parts of the OAR 660-024-0060(8) analysis require the City to consider, evaluate and compare potential service and capacity impacts to existing or planned facilities and services that serve land already in the UGB. In this step the City determined whether potentially suitable lands can physically be served. This includes consideration of whether facilities and services are physically possible given how such facilities and services would impact capacities of existing and planned facilities and services. OAR 660-024-0060(8) provides a list of facilities and services that must be addressed in the public facilities and services comparative analysis:

OAR 660-024-0060(8)

> *"The Goal 14 boundary location determination requires evaluation and comparison of the relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services needed to urbanize alternative boundary locations. This evaluation and comparison must be conducted in coordination with service providers, including the Oregon Department of Transportation with regard to impacts on the state highway system. "Coordination" includes timely notice to service providers and the consideration of evaluation methodologies recommended by service providers. The evaluation must include:*
>
> *(a) The impacts to existing water, sanitary sewer, stormwater and transportation facilities that serve nearby areas already inside the UGB;*

(b) The capacity of existing public facilities and services to serve areas already inside the UGB as well as areas proposed for addition to the UGB; and

(c) The need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements on existing roadways and, for urban areas of 25,000 or more, the provision of public transit service."

As stated in OAR 660-024-0060(8)(a-c), impacts to existing water, sanitary sewer, storm water and transportation facilities and capacity of facilities that serve nearby areas already inside the UGB, and the need for new transportation facilities, are key factors to be considered in making a determination with respect to the provision of public facilities and services needed to urbanize alternative boundary locations. Thus such impacts and needs are key factors to be considered in making a determination that a particular area is suitable to accommodate the need deficiency determined under OAR 660-024-0050 and are identified in Table 4.

Extending public water and wastewater and would impact existing services primarily by adding flows to existing mains or via new mains. Volumes of flows to the MWMC sewage treatment facility would increase. Water quality regulations will require pretreatment of discharges. Additional water volume needs would increase SUB water treatment needs. As stated in Table 4, extension of mains is not physically possible in some areas.

Adding vehicular trips to serve industrial and commercial land uses would impact existing roads and bridges primarily by increasing traffic and by creating physical stress on roadways not designed and constructed to withstand heavy truck and public transit buses. Road maintenance needs would increase as facility size and length increases. Operational costs would increase as facility size, length and distance from operations centers increases. Adding additional stormwater flows to receiving streams and rivers would impact capacity of facilities that serve nearby areas already inside the UGB. For example, the Cedar Creek basin (Far East study area) is already nearing capacity while the easternmost portion of the UGB that drains into that basin is yet be fully developed. Most areas in the UGB study are outside of existing City drainage basins. Water quality regulations will require pretreatment of all discharges.

Expansion of the water, wastewater and stormwater systems will create additional maintenance needs, increasing overall systems maintenance needs.

Industrial and commercial development would generate need for transit service. Increasing industrial and commercial development in an area is likely to result in an increase in transit service to an area that could benefit the overall system as well as end users in an area.

The City evaluated these impacts when it identified existing water, sanitary sewer, storm water and transportation facilities that serve nearby areas already inside the UGB in Table 5 (page 237-251). Table 5 identifies substantial infrastructure needs to serve exception land.

For the purpose of evaluating impacts to existing water, sanitary sewer, storm water and transportation facilities and capacity of facilities that serve nearby areas already inside the UGB, and the need for new transportation facilities, the City grouped the potentially suitable second priority parcels within general geographic areas as shown in Table 2.

For the purpose of evaluating serviceability of parcels within the second priority [ORS 197.298(3)(a) category, the City grouped the potentially suitable second priority parcels within general geographic areas as shown in Table 5.

For each Study Area general geographic grouping, the City engineers, service providers, and ODOT staff provided an assessment of facilities that would likely require upgrading or replacement in order to provide additional capacity to serve development beyond the existing UGB. Those assessments are listed in Table 5.

The City's evaluation and comparison of the relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services needed to urbanize alternative boundary locations was conducted in coordination with service providers, including the Oregon Department of Transportation with regard to impacts on the state highway system.

As required in OAR 660-024-0060(8)(a), the City evaluated and compared the relative advantages and disadvantages of potentially suitable second priority exception land by gathering and compiling data in Table 2: General Description of Second Priority Exception Lands Parcels and Constraints, Table 3: Second Priority Land Public Services Analysis Summary, and Table 5 Second Priority Land Public Facilities and Services Analysis Summary. Based on this compilation of input and data, and the facilities plans described in pages 219-242, the City determined whether a parcel or group of exception parcels could reasonably be provided with the water, sewer/wastewater, stormwater, and transportation including transit facilities and services needed to urbanize land to accommodate the need deficiency determined under OAR 660-024-0050 within the 2010-2030 planning period.

The City correctly applied the requirement of OAR 660-024-0060(8)(a) in its analysis of second priority land under ORS 197.298.

As stated in OAR 660-024-0060(8)(b), the capacity of existing public facilities and services to serve areas already inside the UGB as well as areas proposed for addition to the UGB is a key factor to be considered in making a determination with respect to the provision of public facilities and services needed to urbanize alternative boundary locations, and thus capacity is a key factor to be considered in making a determination that a particular area is suitable to accommodate the need deficiency determined under OAR 660-024-0050.

As required in OAR 660-024-0060(8)(b), the City evaluated and compared impacts to existing public facilities and services to serve areas already inside the UGB by gathering and compiling data in Table 2: General Description of Second Priority Exception Lands Parcels and Constraints and Table 5: Second Priority Land: Public Services Analysis Summary. Based on this data, the City determined whether and how providing a parcel or group of second priority exception parcels with the water, sewer/wastewater,

stormwater, and transportation including transit services needed to urbanize land to accommodate the need deficiency determined under OAR 660-024-0050 would impact existing and planned public facilities and services within the 2010-2030 planning period.

The City correctly applied the requirement of OAR 660-024-0060(8)(b) in its analysis of second priority land under ORS 197.298.

As stated in OAR 660-024-0060(8)(c), the need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements on existing roadways — and as Springfield is an urban areas of 25,000 or more — the provision of public transit service, are key factors to be considered in making a determination with respect to the provision of public facilities and services needed to urbanize alternative boundary locations; and thus are key factors to be considered in making a determination that a particular area is suitable to accommodate the need deficiency determined under OAR 660-024-0050.

As required in OAR 660-024-0060(8)(c), the City evaluated and compared advantages and disadvantages with respect to the need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements on existing roadways and the provision of public transit service by gathering and compiling facilities maps and data in Table 2: General Description of Second Priority Exception Lands Parcels and Constraints and Table 3: Second Priority Land: Public Services Analysis Summary. The City collected public facilities data from ODOT and other Federal, State and Local agencies and service providers. Based on this data, the City determined whether a parcel or group of second priority exception parcels could be made accessible with the transportation facilities including transit services needed to urbanize land to accommodate the need deficiency determined under OAR 660-024-0050 within the 2010-2030 planning period.

The City correctly applied the requirement of OAR 660-024-0060(8)(c) in its analysis of second priority land under ORS 197.298.

OAR 660-024-0060 (7)

> *"For purposes of Goal 14 Boundary Location Factor 2, "public facilities and services" means water, sanitary sewer, storm water management, and transportation facilities."*

Consistent with OAR 660-009-0005(9) : "'Serviceable' means a city or county has determined that public facilities and transportation facilities, <u>as defined by OAR chapter 660, division 11 and division 12</u>, currently have adequate capacity for development planned in the service area where the site is located or <u>can be upgraded</u> to have adequate capacity within the 20-year planning period." For land to be reasonably considered as serviceable within the planning period, "orderly and economic provision of public facilities and services" must be possible within the planning period.

Using GIS mapping and analysis tools and input received from the CIBL Technical Advisory Committee, City, County and State public agency staff including ODOT and Lane Transit District, other service providers and the public, the City conducted analysis to evaluate, compare and determine whether and

how water, sanitary sewer, storm water management, and transportation facilities could be provided to potentially suitable second priority exception parcels within the seven geographic areas: McKenzie View, Mohawk, Oxbow/Camp Creek, Far East, Wallace Creek, Jasper Bridge, and Seavey Loop. The result of this step is a determination of whether parcels within each priority and within each geographic grouping can reasonably be served to support the employment land uses identified in the CIBL/EOA within the 2010-2030 planning horizon.

The City correctly applied the requirement of OAR 660-024-0060(7) in its analysis of second priority land under ORS 197.298 by evaluating and comparing water, sanitary sewer, storm water management, and transportation facilities in its analysis of "public facilities and services", as demonstrated in the summary of data in Table 5 and as further supported by evidence in the record.

The following section of this report provides a general overview and maps of existing water, sanitary sewer, storm water management, and transportation facilities to describe the physical location and proximity of existing facilities to potentially suitable parcels and to identify physical or regulatory barriers that would make service extensions difficult or infeasible to support development within the 2010-2030 planning period. As previously noted, this section provides explanation and evidence to support the City's findings addressing ORS 197.2989(1)though (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060 (1)(c), OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060 (7), OAR 660-024-0060 (8)(a), OAR 660-024-0060 (8)(b), and OAR 660-024-0060 (8)(c).

This section provides additional evidence to support the City's rationale for excluding from consideration the McKenzie View A, West Jasper/Mahogany, Clearwater, Seavey Loop A, D, F and Seavey Loop/Goshen exception parcels in the previous step.

To avoid unnecessary redundancy within this report, the following information identifies information used by the City to identify and compare public infrastructure, facilities and services deficiencies though the remainder of this boundary location alternatives analysis. Thus, this section provides additional evidence to support the City's rationale for excluding lands from consideration in the previous steps and subsequent steps.

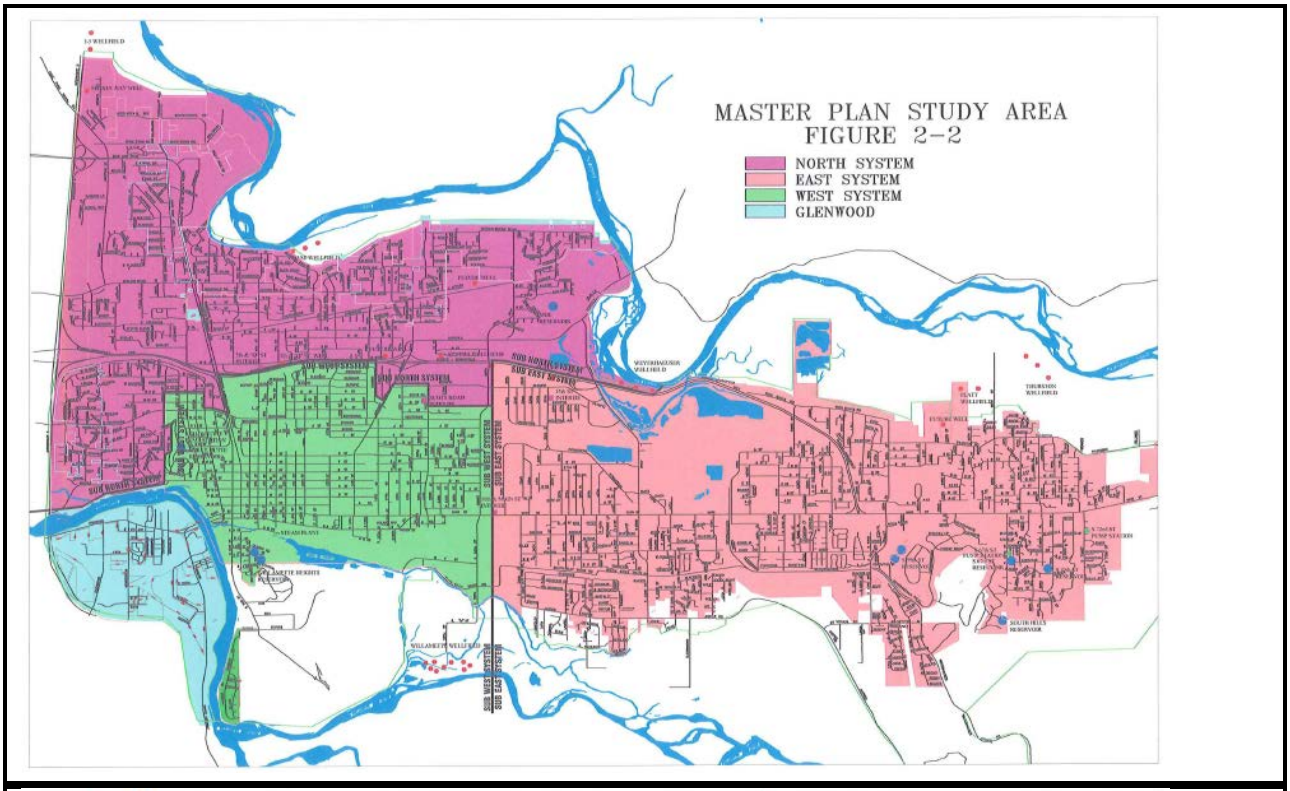
The City incorporated maps and data from City, Eugene-Springfield Metro area and Lane County facilities plans and service provider plans to complete the Public Services Analysis, including but not limited to:

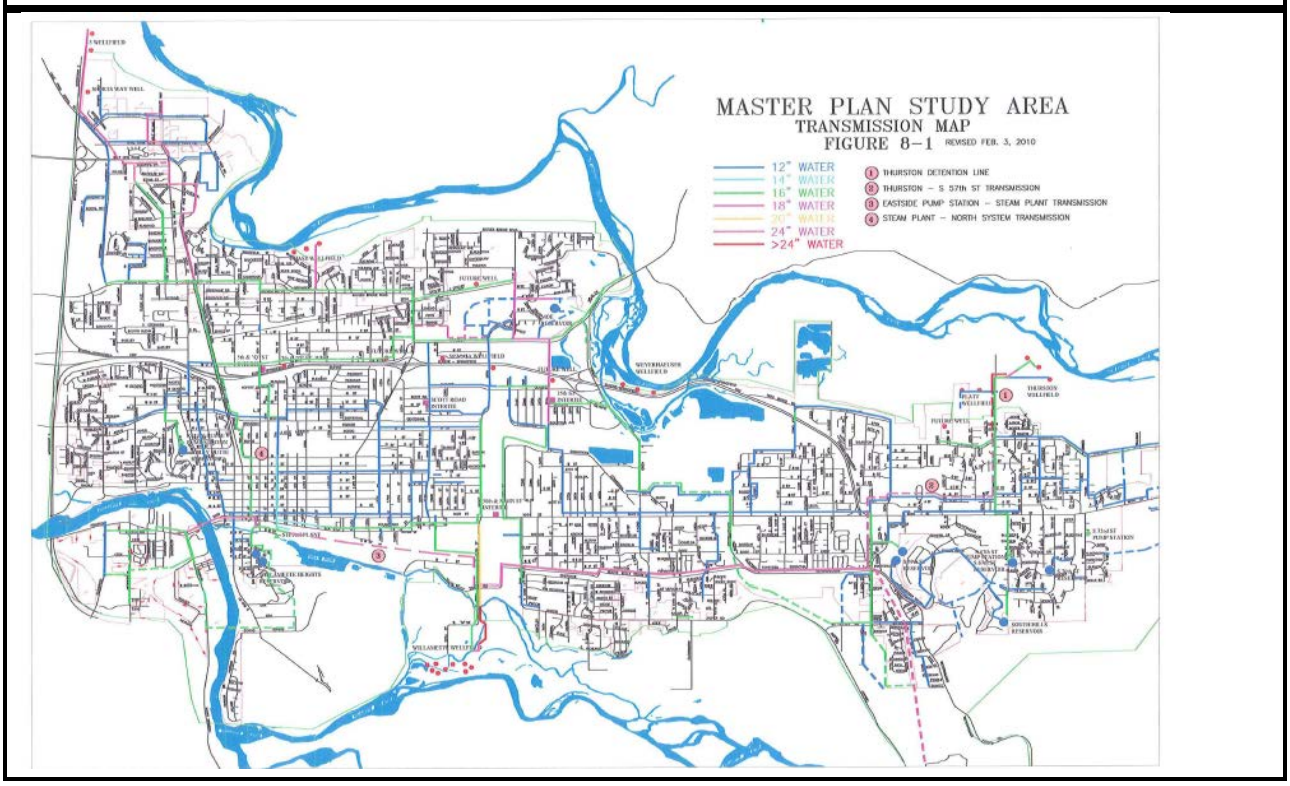
<u>Water</u>

- *Water System Master Plan for Springfield Utility Board*, April 2010
- *Springfield Utility Board & Rainbow Water District Water Management and Conservation Plan*, 2012

The following map provides a general depiction of the existing water system in the area.

Existing Water System, Master Plan for Springfield Utility Board, Figures 2-2 and 8-1





The preceding maps depict the extent of SUB/Rainbow existing water system in 2010 and are included to explain how waterways and distance are constraints that influence and place limitations on potential service extensions to lands beyond the existing UGB.

In addition to the water system depicted above, the Willamette Water Company currently provides water service to the Seavey Loop/Goshen area by purchasing water from Eugene Water and Electric Board (EWEB), and transmitting water through its system from Bloomberg Reservoir, west of I-5, to homes and businesses. The company owner's representative submitted information into the record describing the existing system, and the owner confirmed the accuracy of information submitted. [36] A company representative also participated in the College View Study Area Stakeholder Working Group.[37]

Oregon Dept. of Water Resources staff Michael Mattick provided information about Willamette Water Company:[38]

- Has water right for 4 cfs, and is currently using 0.43 cfs. as of May 21, 2014.
- Has a permit valid through October 1, 2040 (Permit S-50877)
- Buys treated water from EWEB and runs it through their piped system
- Serves 148 connections, and estimated 444 users; expects 541 connections serving 1,620 in 2040.

Consistent with Metro Plan policy, it is SUB's position that if lands in Seavey Loop/College View area were added to the UGB, "they would be served by SUB, as municipal water providers take over service once an end user is annexed," [39] "Short term, they may continue to be served by their incumbent water provider. As in the past, for efficiency SUB is open to providing a transition to SUB service sooner rather than later."

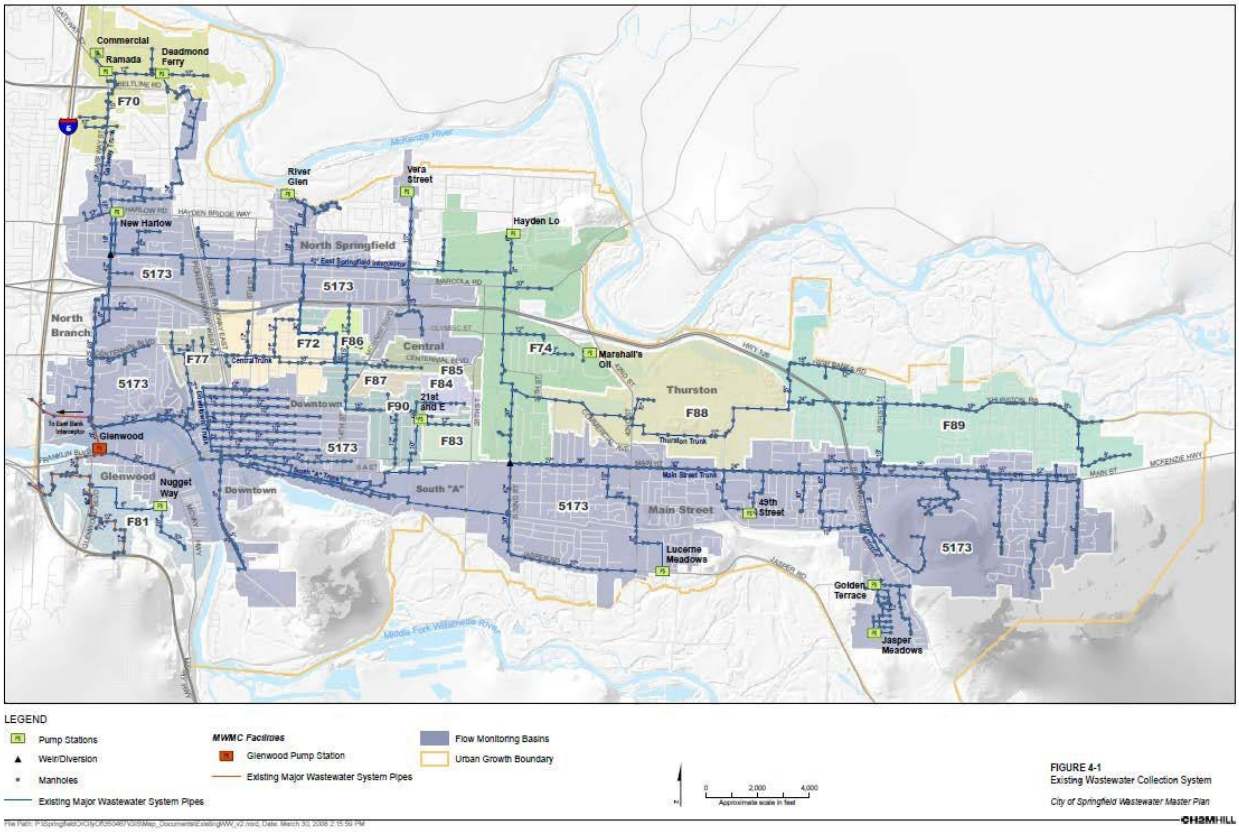
<u>Sanitary Sewer</u>

- *City of Springfield Wastewater Master Plan,* June 2008, prepared by CH2MHill

The following map provides a general depiction of the existing wastewater system in the area.

[36] Letter from Bill Kloos to City of Springfield and Lane County Planning Commissions, Feb. 17, 2010; and email to staff Pauly from Greg Demers, June 21, 2013.
[37] Stakeholder Working Group meetings were held on Feb. 11, 2015, February 25, 2015, and March 4, 2015.
[38] Meeting with staff Pauly on May 20, 2014; email and attached copy of S-50877 permit to staff Pauly on May 21, 2014.
[39] Email from SUB General Manager Jeff Nelson to staff Pauly, May 23, 2014

Existing Wastewater Collection System, City of Springfield Wastewater Master Plan Figure 4-1



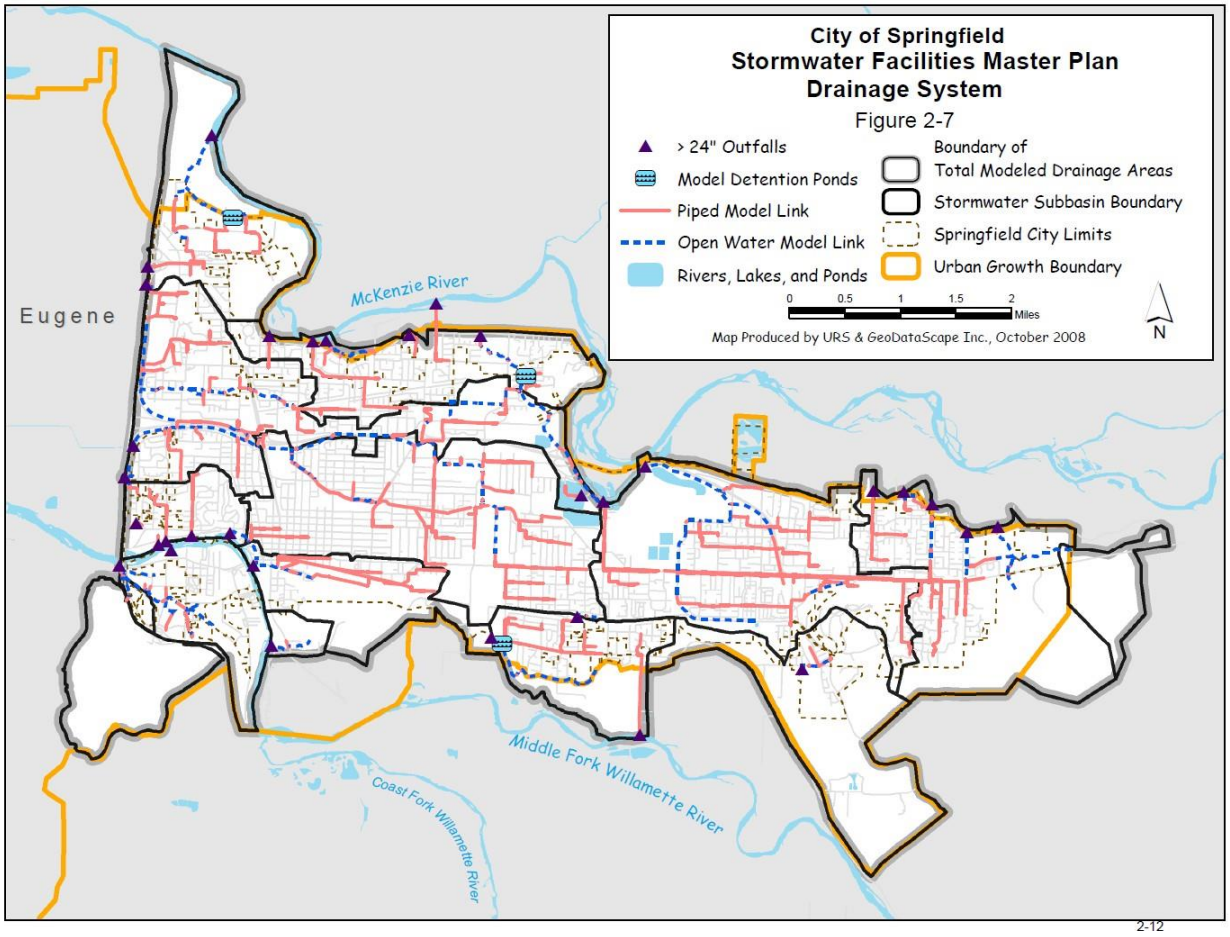
The preceding map depicts the extent of the existing wastewater service area and system in 2008 and explains how topography, waterways and distance are constraints that influence and place limitations on potential service extensions to lands beyond the existing UGB.

<u>Stormwater Management</u>

- *City of Springfield Stormwater Facilities Master Plan*, Oct. 2008, prepared by URS

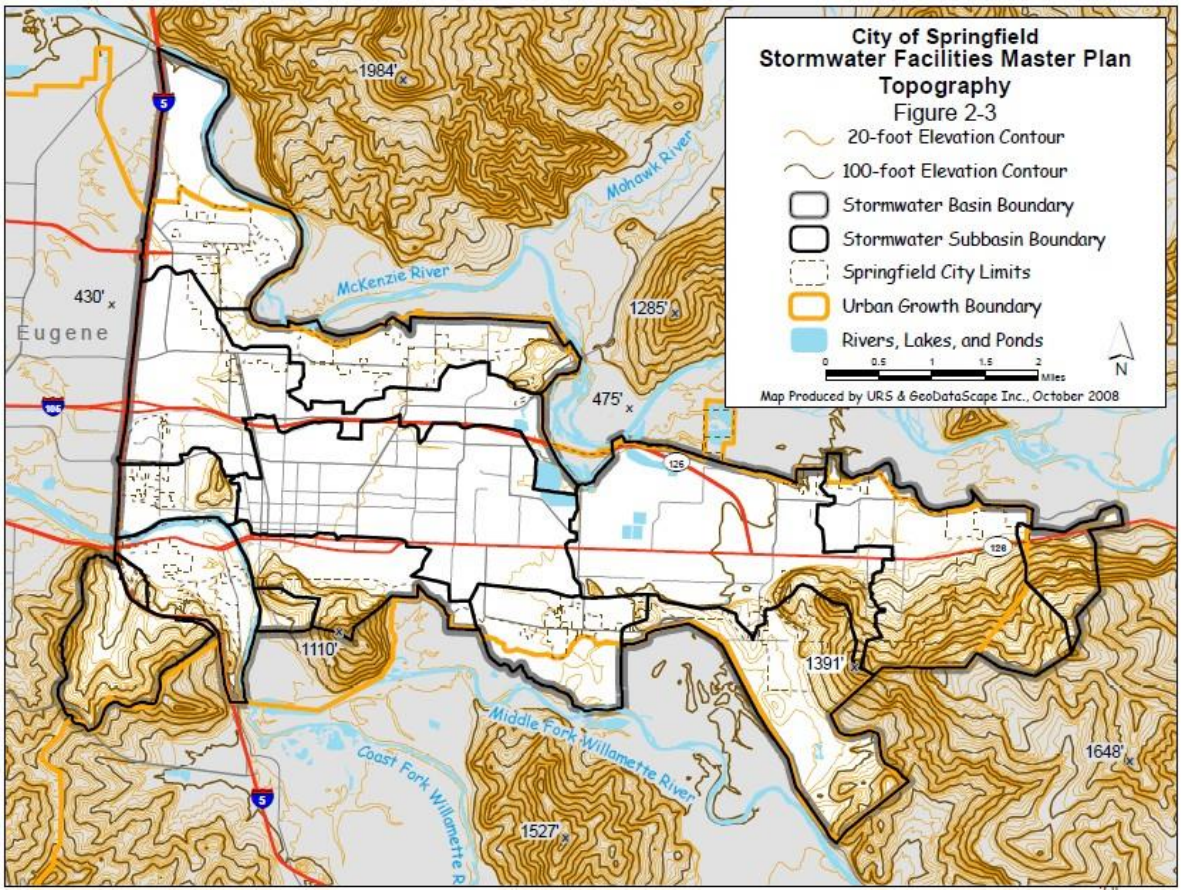
The following map depicts the extent of the existing stormwater drainage system, including outfalls, in 2008 and explains how topography, waterways, outfalls to waterways, and distance are constraints that influence and place limitations on potential service extensions to lands beyond the existing UGB. The City's findings under Goal 11 provide more information about stormwater management facilities and applicable policies.

City of Springfield Stormwater Facilities Master Plan Figure 2-7 Drainage System



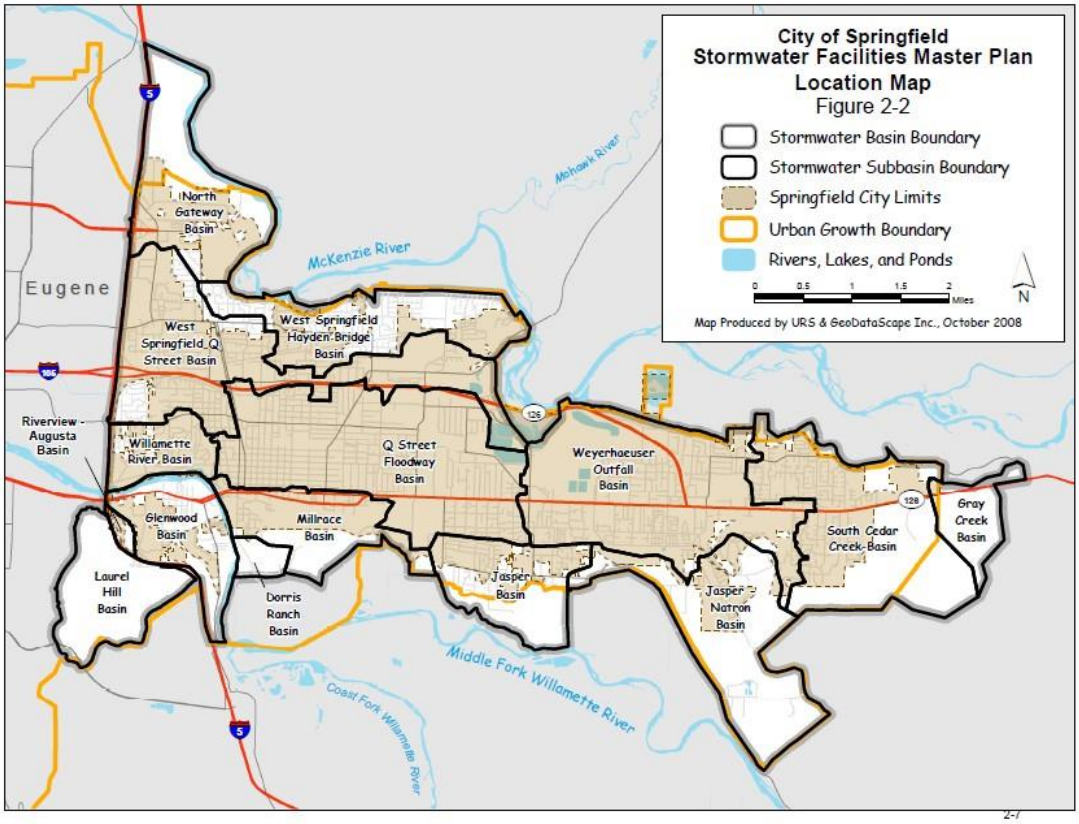
The following map depicts topography surrounding the UGB to demonstrate how topography presents constraints that influence and place limitations on potential service extensions to lands beyond the existing UGB.

Stormwater Facilities Master Plan Figure 2-3 Topography



The following map depicts the extent of the existing stormwater service area and system in 2008 to explain how topography, waterways, gravity flow and distance influence and place limitations on potential service extensions to lands beyond the existing UGB.

Stormwater Facilities Master Plan Figure 2-2 Basin Location



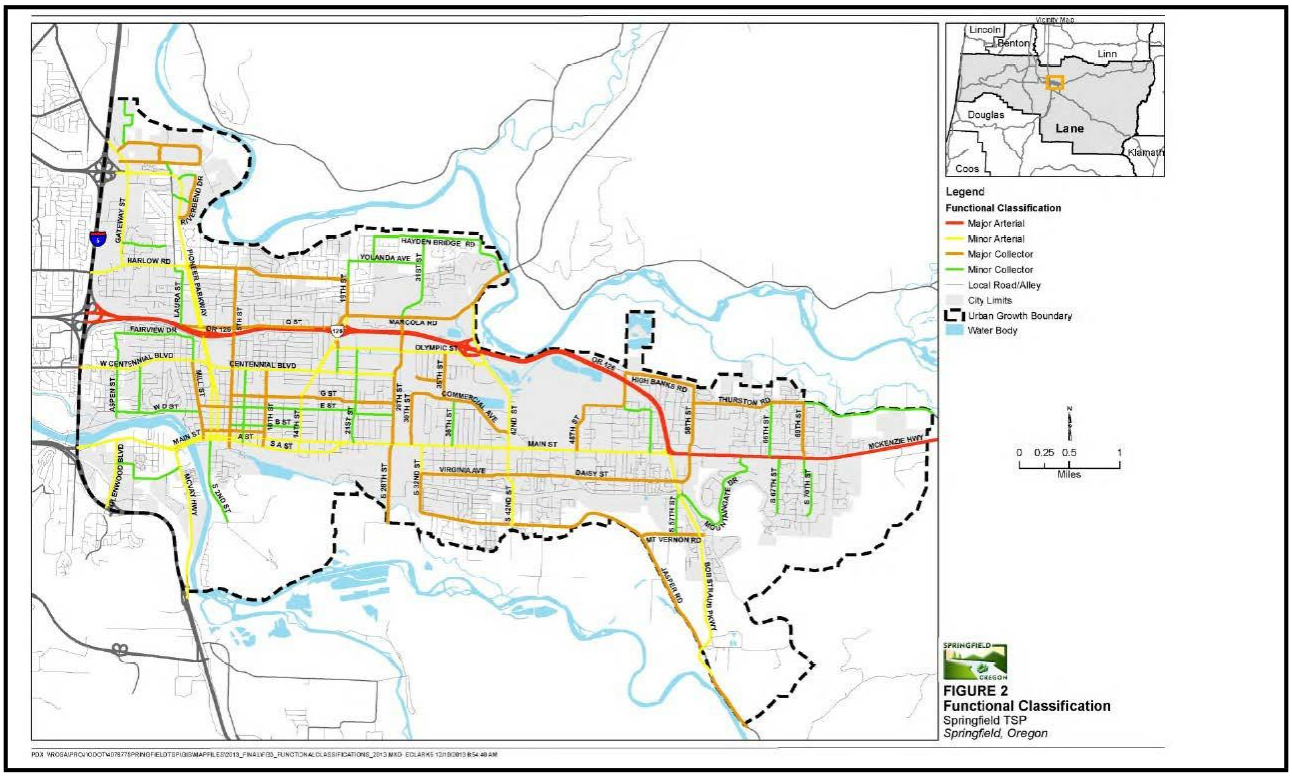
Transportation

- 2004 Lane County Transportation System Plan
- Lane County Roads Inventory
- 2035 City of Springfield Transportation System Plan
- 2002 Eugene-Springfield Transportation System Plan (TransPlan)
- Central Lane MPO Regional Transportation Plan

The following maps provide general depictions of the existing transportation system in Springfield and in the areas outside the UGB. The City's findings under Goal 12 provide more information about transportation facilities and applicable policies.

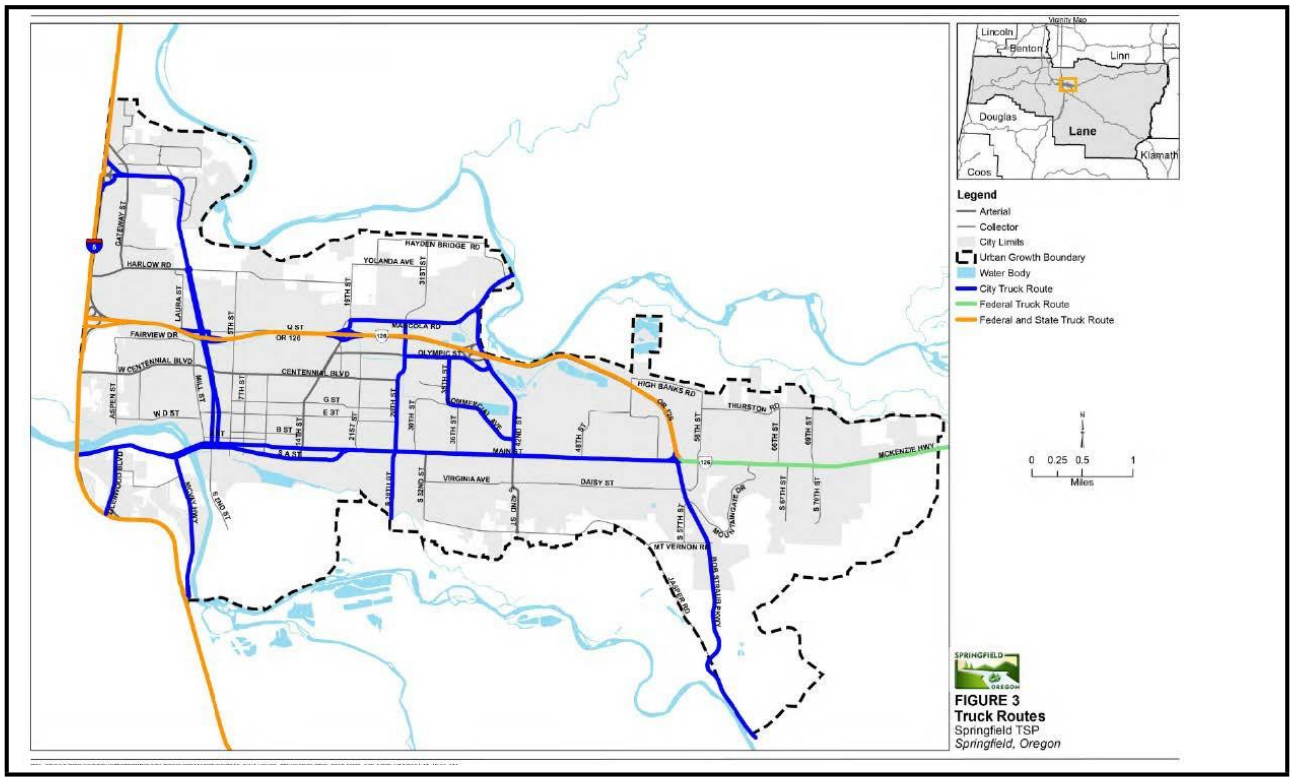
Springfield TSP Map Functional Classifications (2014) depicts the existing transportation system backbone to compare the location of existing facilities in relationship with lands outside the UGB. Lack of transportation facilities is a constraint that influences and place limitations on potential service extensions to lands beyond the existing UGB.

Springfield TSP Functional Classifications (2014)



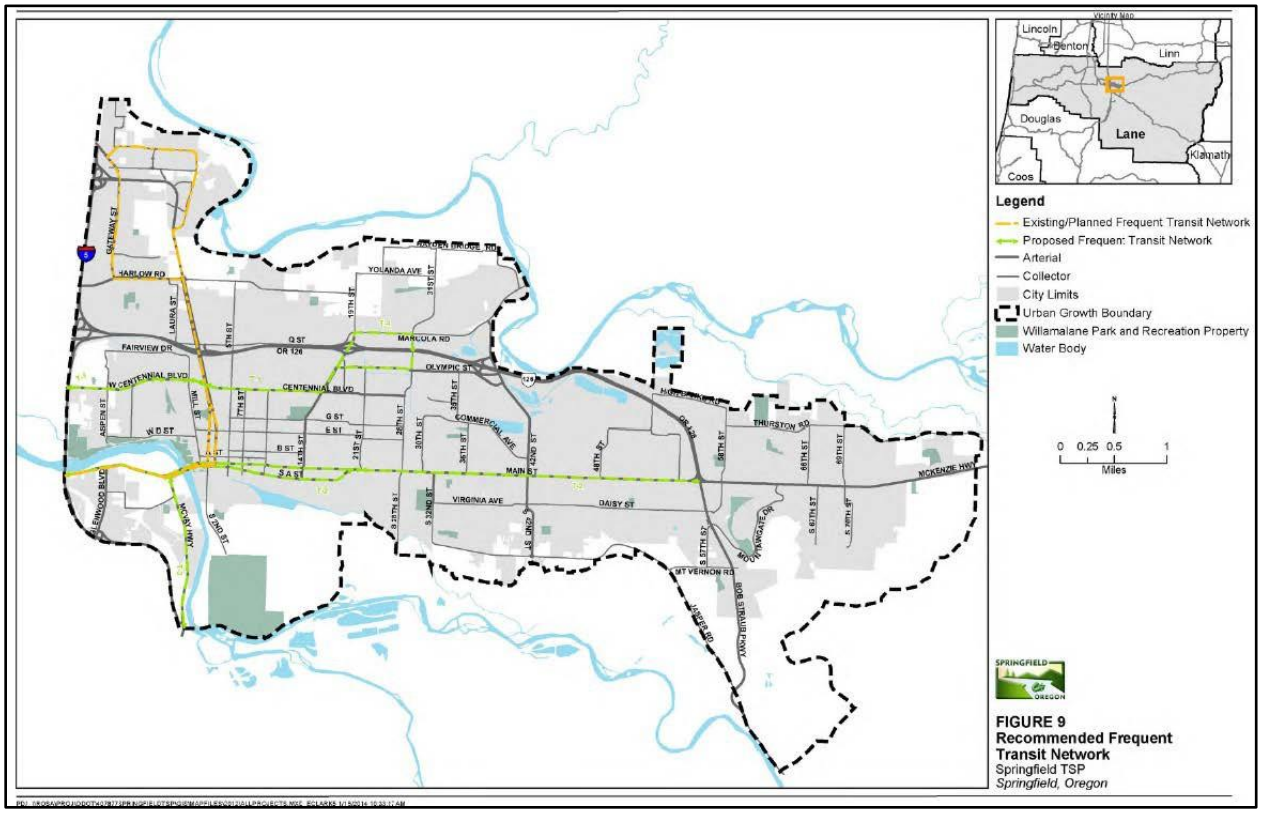
The following map depicts existing Federal, State, and Local truck routes to compare the location of existing facilities in relationship with lands outside the UGB. Location relative to transportation facilities that are designated, designed and built to support truck traffic is a consideration that influences and place limitations on potential service extensions to serve industrial and commercial lands within and beyond the existing UGB.

Springfield TSP Truck Routes

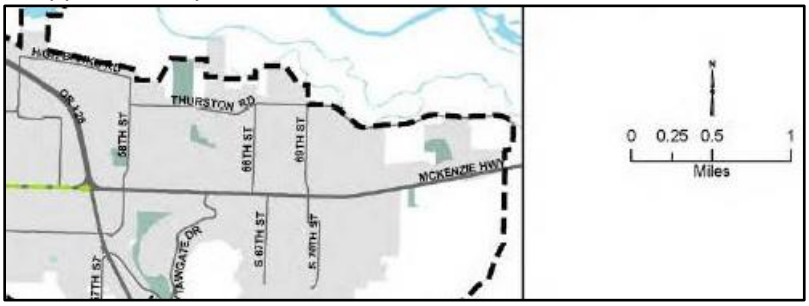


Planned Frequent Transit Service Network. The following map depicts the existing and planned frequent transit network to compare the location of existing and planned transit facilities in relationship with lands outside the UGB. OAR 660-024-0060(8)(c) identifies the provision of transit service as a service that cities larger than 25,000 must evaluate and compare in their UGB location alternatives analyses. Thus, the availability of and proximity to existing and planned networked transit facilities to serve urban development is an important consideration to ensure that new employment areas are accessible to the population, including the transportation disadvantaged.

Springfield TSP Figure 9 Recommended Frequent Transit Network



As shown in Springfield TSP figure 9, the Recommended Frequent Transit Network is planned to extend to approximately 2.3 miles west of the eastern UGB extent on Main Street/Highway 126.

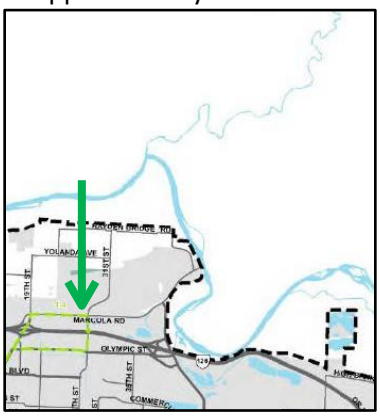


Detail of Springfield TSP Figure 9 Recommended Frequent Transit Network map

As shown in Springfield TSP figure 9, the Recommended Frequent Transit Network is currently located approximately 0.25 miles from the northern extent UGB (International Way/Maple Island Rd.).

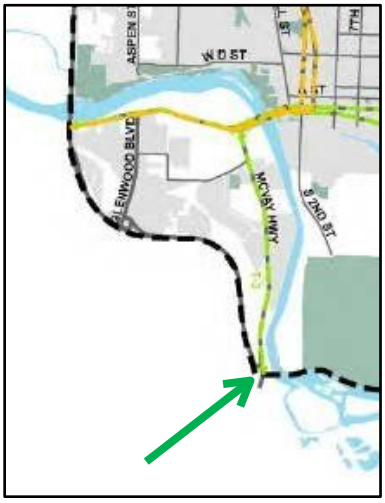
Detail of Springfield TSP Figure 9

As shown in Springfield TSP figure 9, the Recommended Frequent Transit Network is planned to extend to approximately 1.25 miles to the northern extent of the UGB at Marcola Rd/Hayden Bridge.



Detail of Springfield TSP Figure 9

As shown in Springfield TSP figure 9, the Recommended Frequent Transit Network is planned to extend to the southern extent of the UGB at McVay in Glenwood.



Detail of Springfield TSP Figure 9

As shown in Springfield TSP figure 9, the Recommended Frequent Transit Network is planned to extend on Main Street approximately 0.75 miles from the southern extent of the UGB at South 28th Street and

on South A approximately ½ mile from the UGB. Existing frequent transit service is on Main Street.

Detail of Springfield TSP Figure 9

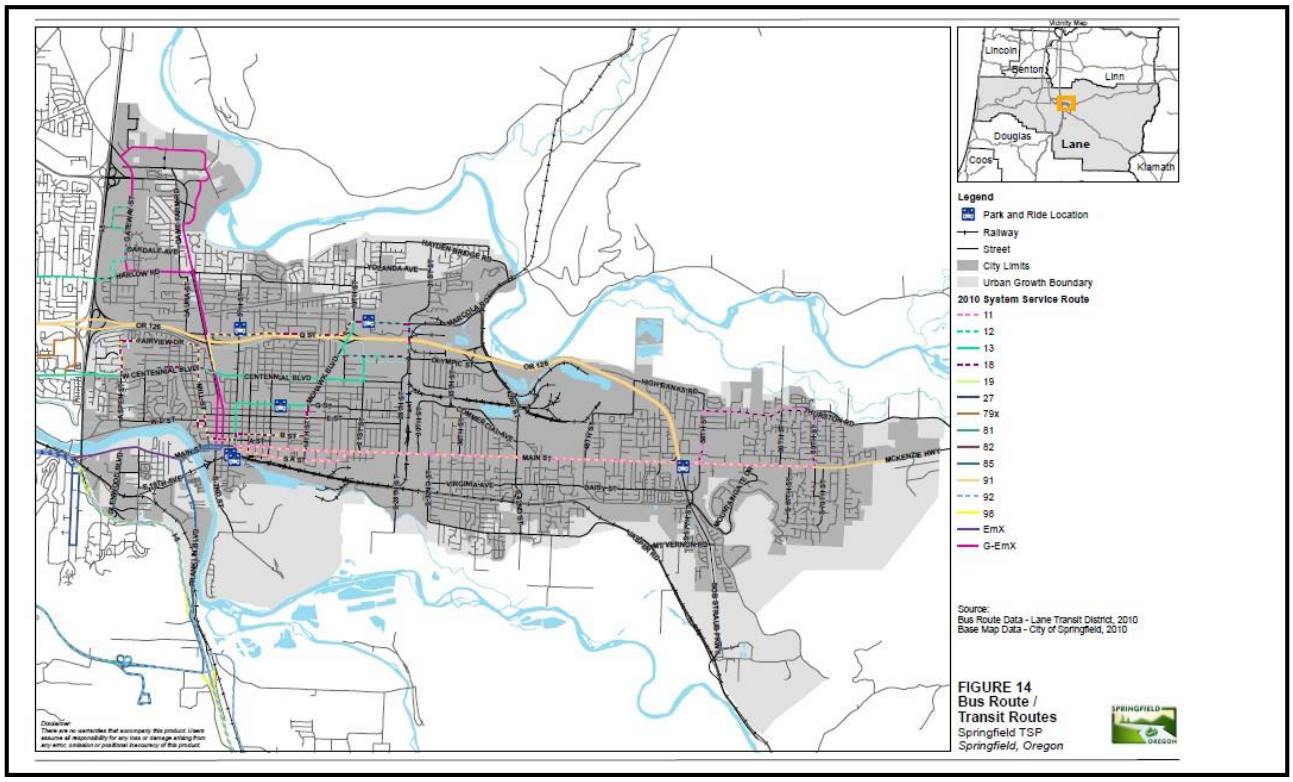
As shown in Springfield TSP figure 9, the Recommended Frequent Transit Network is planned to extend to approximately 2.75 miles to the southeastern extent of the UGB at Jasper Road.

Detail of Springfield TSP Figure 9

Existing Transit Service Routes

The following map depicts existing bus/transit routes operating in 2010 to demonstrate the location of existing transit facilities in relationship with lands outside the UGB. OAR 660-024-0060(8)(c) identifies the provision of transit service as a service that cities larger than 25,000 must evaluate and compare in their UGB location alternatives analyses. Thus, the availability of and proximity to existing and planned networked transit facilities to serve urban development is an important consideration to ensure that new employment areas are accessible to the population.

Springfield TSP Existing Conditions Bus Routes/Transit Routes



As shown in the following details of the Lane Transit District System Map, three exception areas —the Far East, Seavey Loop/Goshen and Jasper Bridge B — are currently served by the public transit system or have existing routes in the vicinity of the exception area.

In 2010, Route 91 McKenzie Bridge provides service along East Main/Highway 126 via Route 91 with limited service and trips:

91 - McKenzie Br - Route Description

> *The route begins at Eugene Station (Bay G) and travels North on Olive, East on 10th Avenue, North on High Street, and East on 7th Avenue. The bus crosses the Ferry Street Bridge and travels on I-105/Highway 126 to arrive at Thurston Station (Bay B). <u>It continues along Main Street/Highway 126</u> to serve Walterville, Leaburg, Vida, Nimrod, Finn Rock, Blue River, McKenzie Bridge and McKenzie River Ranger Station. To return the bus travels on the same route to Eugene Station.*
>
> *During morning trips the bus serves Mckenzie River Drive between Blue River and McKenzie Bridge before arriving at the Ranger Station. After noon, this area will be served after departing from the Ranger Station to head back to Eugene Station*
>
> *Route Variation: The weekday 5:30 PM trip; the route begins at Eugene Station (Bay G) and travels North on Olive, East on 10th Avenue, North on High Street, and East on Broadway which becomes Franklin Boulevard where it serves the Onyx Street. Franklin Boulevard becomes South*

A Street where the bus serves Springfield Station (Bay H). The bus continues East down South A Street to Main Street until reaching Thurston Station (Bay B). The bus travels on regular routing after Thurston Station.

The weekday 6:14 AM trip which begins at the McKenzie River Ranger Station and follows the same limited routing in reverse upon reaching Springfield Station. However, the bus travels from Franklin Boulevard East on 11th to Eugene Station.

Route 91 Map

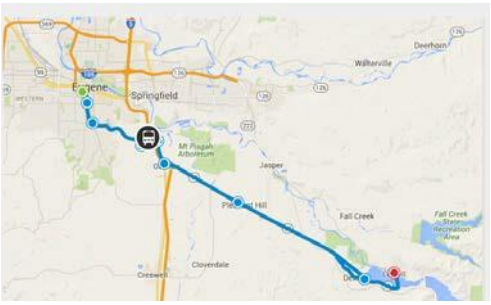
Routes 91 and 11 detail of Springfield TSP Figure 14 TSP Existing Conditions Bus Routes/Transit Routes map showing the location of existing Route 91 transit service to eastern UGB extent. UGB is indicated by light gray.

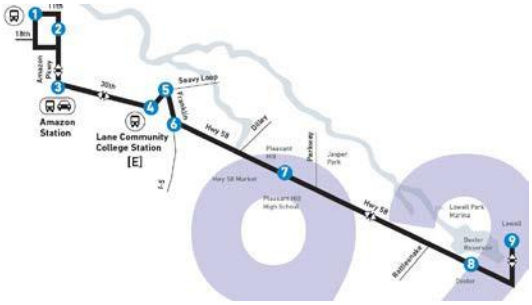
As shown in the following description and route map detail of the Lane Transit District System Map, Route 92 Lowell/LCC provides limited service and trips connecting Eugene, Pleasant Hill and Lowell via Franklin Blvd. in the vicinity of the Seavey Loop/Goshen exception area, and following Highway 58 in the vicinity of exception area Jasper Bridge B:

92 - Lowell/LCC - Route Description[40]

The route begins at Eugene Station (Bay I) and travels South on Willamette Street, East on 13th Avenue, and South on Pearl Street where it serves the West side of South Eugene High School before continuing South on Amazon Parkway. Upon reaching Amazon Station (Bay C), the bus turns East and travel on 30th Avenue to the Lane Community College exit, and South on Gonyea where it serves Lane Community College Station (Bay E), and Main Campus. <u>The bus departs Lane Community College Station on Gonyea Road and travels East on 30th Avenue across I-5 onto Franklin Boulevard, and travels onto Seavey Loop Road.</u> <u>The bus continues towards Goshen</u> and takes HWY 58 Eastbound where it serves Pleasant Hill. The bus travels North on Pioneer Street to Lowell, crossing Dexter Reservoir, West on East Main Street, North on Moss Street, and East on 2nd Street. The bus turns South on Pioneer Street and continues to Hwy 58 West to travel the regular routing to return to Eugene Station. Route Variation: The 6:32 PM trip leaving Lowell. The bus heads East on Jasper-Lowell Road and resumes on regular inbound routing until the bus reaches 20th Avenue. The 6:32 PM trip does not service LCC. The bus continues West on 30th Avenue and serves Amazon Station (Bay A). It continues North on Amazon Parkway, West on 19th Avenue, North on Oak Street, and West on 13th Avenue where it serves Sacred Heart Medical Center University District and UO Station (Bay B). The bus will head North on Kincaid Street and West on 11th Avenue to Eugene Station.

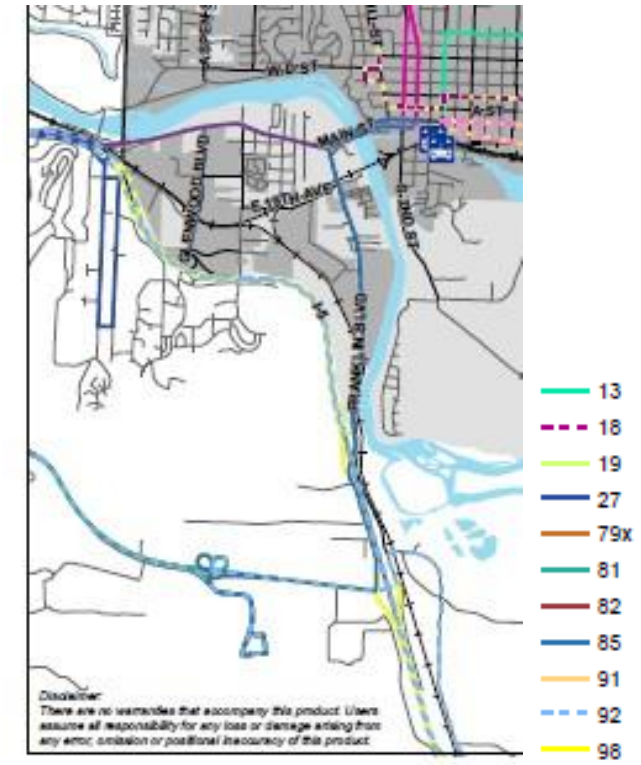
LTD Route 92 Map





[40] LTD website https://www.ltd.org/92-lowell-lcc-route-description/

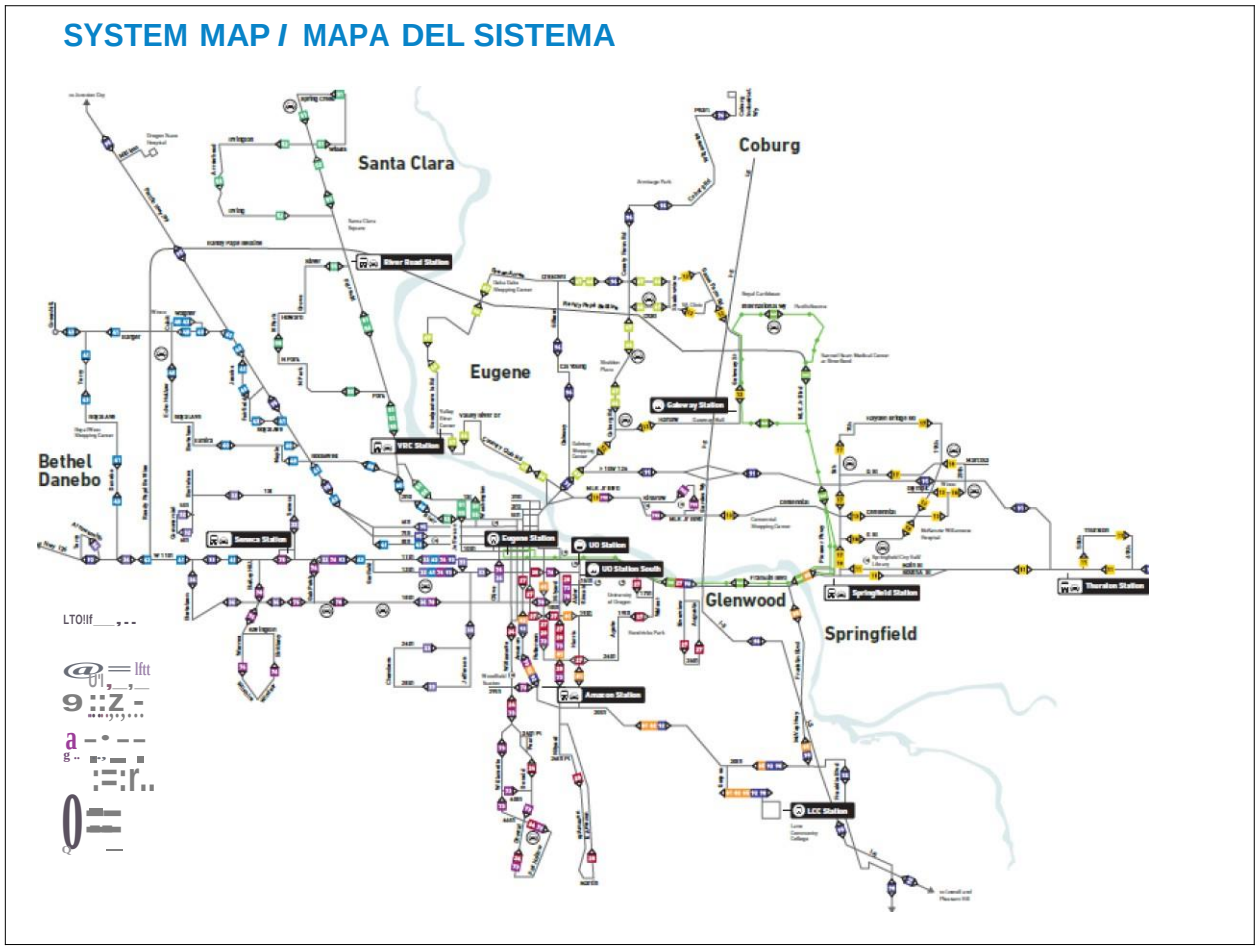
Route 92 Detail of Springfield TSP Figure 14 TSP Existing Conditions Bus Routes/Transit Routes map showing the location of existing Route 92 transit service to the southern UGB extent. UGB is indicated by light gray.



Route 11 Detail of Springfield TSP Figure 14 TSP Existing Conditions Bus Routes/Transit Routes map showing the relative location of existing Route 11 transit service to the southern UGB extent along Jasper Road. UGB is indicated by light gray.

Except where noted above, second and third priority exception and non-resource lands and marginal land areas are located distant to the Lane Transit District System.

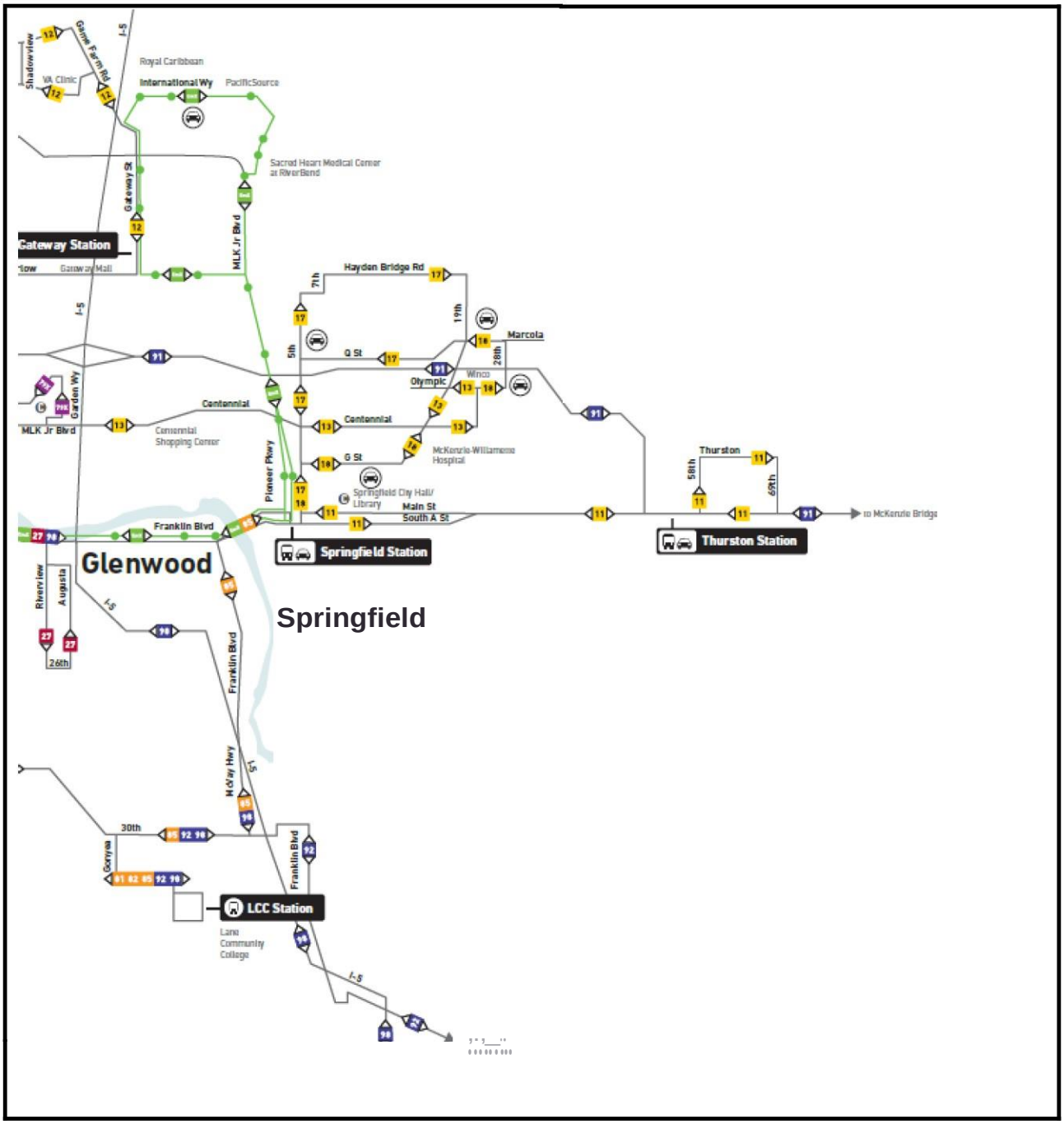
lane Transit District System Map[41]



[41] Lane Transit District website, https:Uwww.ltd.org/system-map/

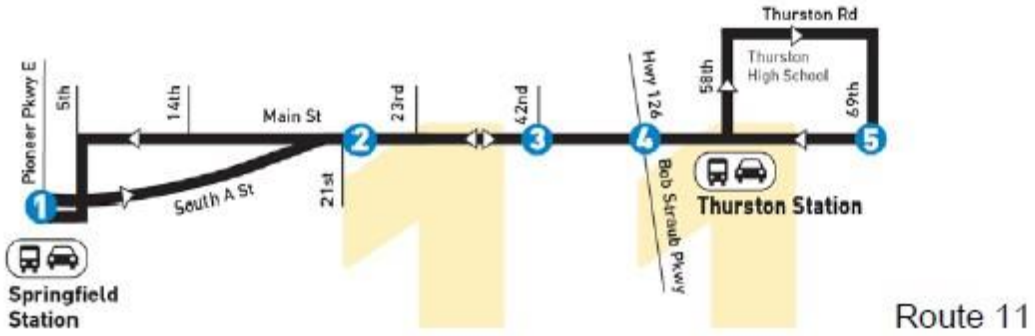
Springfield Detail of lane Transit District System Map 2015 [42]

Green routes indicate existing EmX Bus Rapid Transit System frequent transit service. [43]

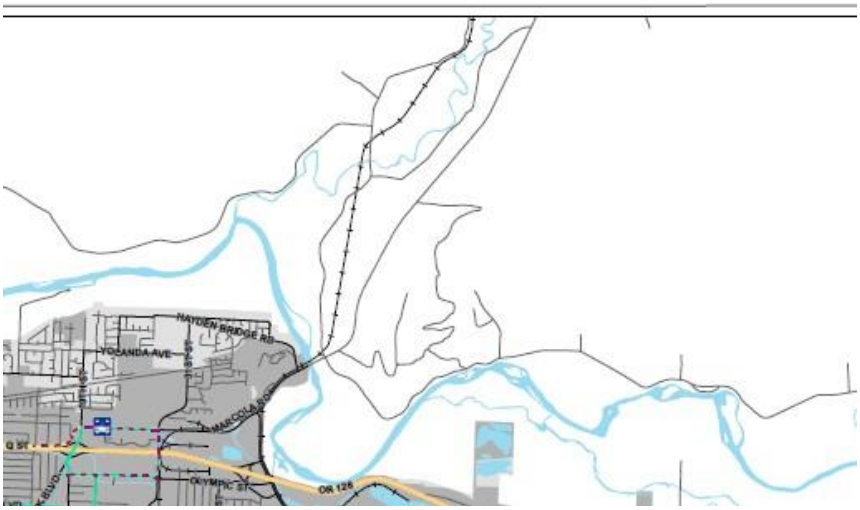


[42] Lane Transit District website, https://www.ltd.org/maps-stations-routing/ accessed 2-1-15.

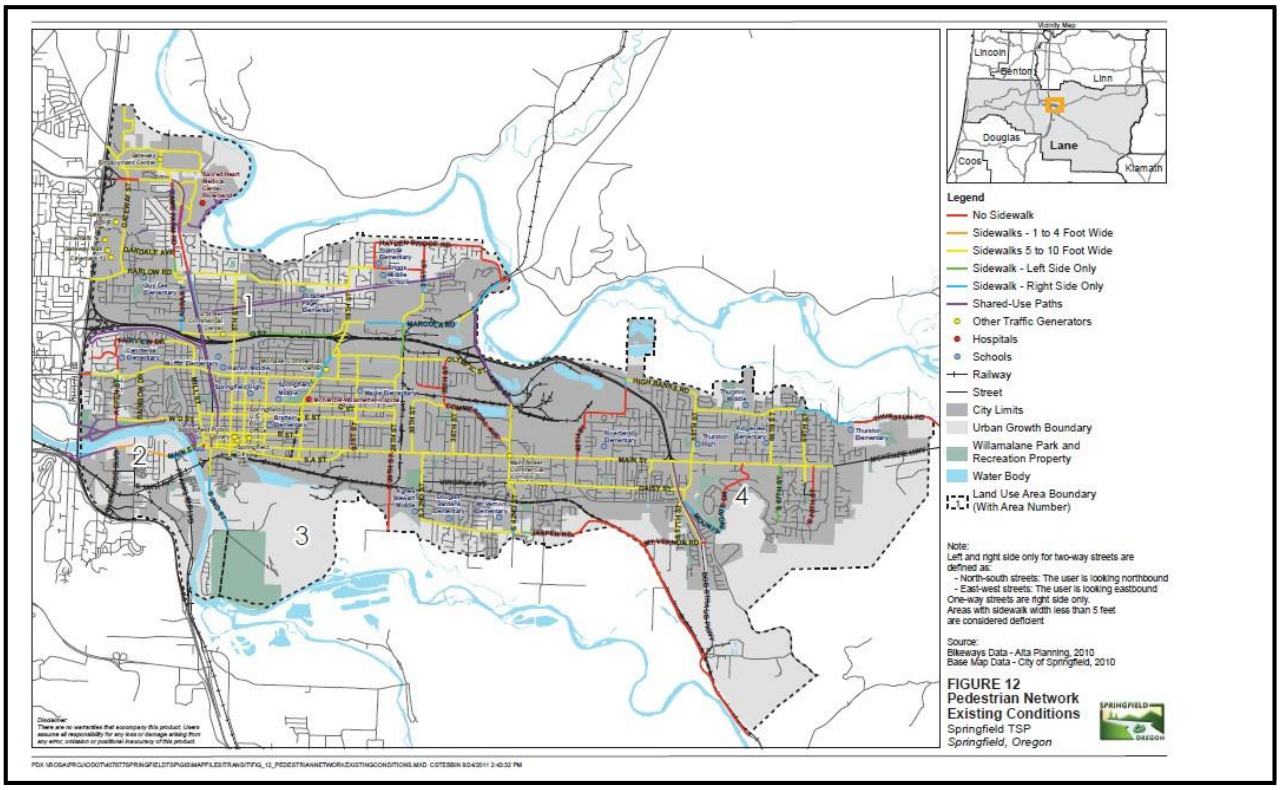
[43] The Main Street route study to select a Preferred Alternative for service improvements between Springfield Station and Thurston Station is underway in 2016.



Route 11 currently provides services in the Main Street corridor east to 58th Street (Thurston High School) continuing on Thurston Road east to 69th Street and back west to Thurston Station.



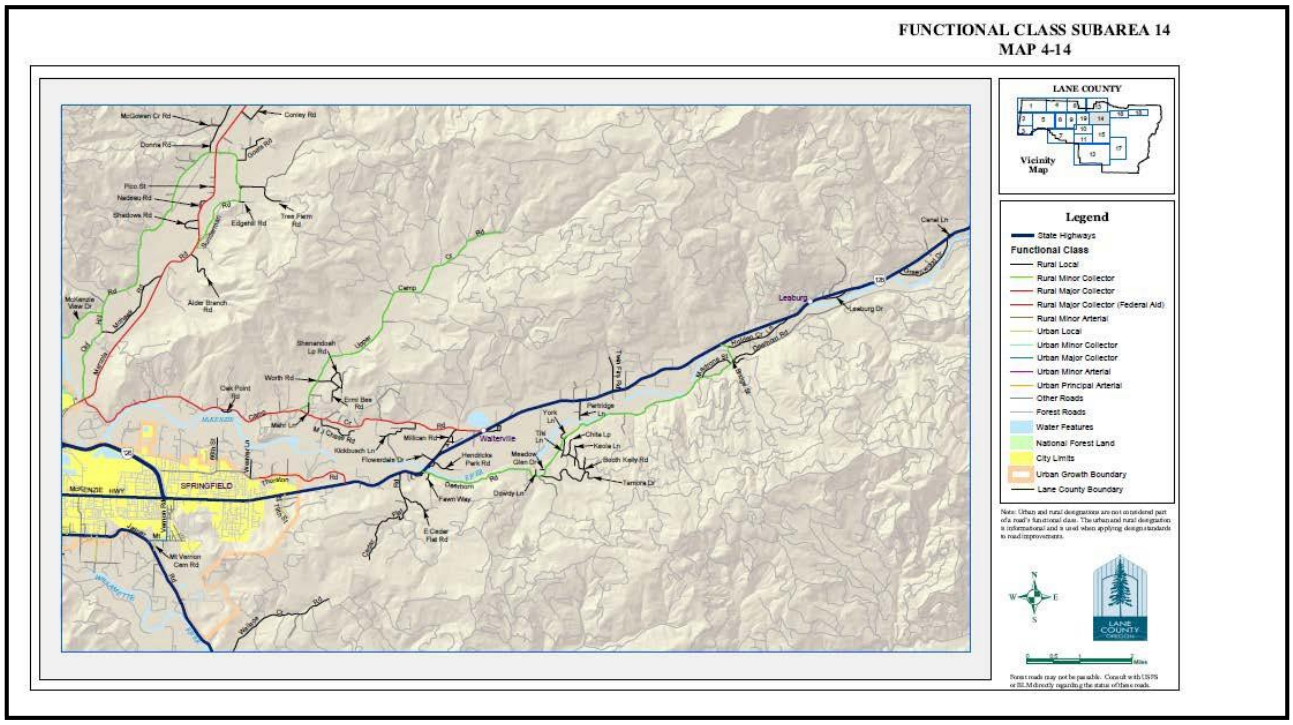
Springfield TSP Existing Conditions Pedestrian Network



The preceding map depicts Springfield's existing network of pedestrian facilities, as of 2010. OAR 660-024-0060(8)(c) identifies the provision of transit service as a service that cities larger than 25,000 must evaluate and compare in their UGB location alternatives analyses. The accessibility of transit services is dependent upon one's ability walk safely to and from a transit stop. Proximity to existing and planned networked pedestrian facilities is an important consideration to ensure that new employment areas are accessible to the workforce population, including the transportation disadvantaged and employees who choose alternative modes of transportation.

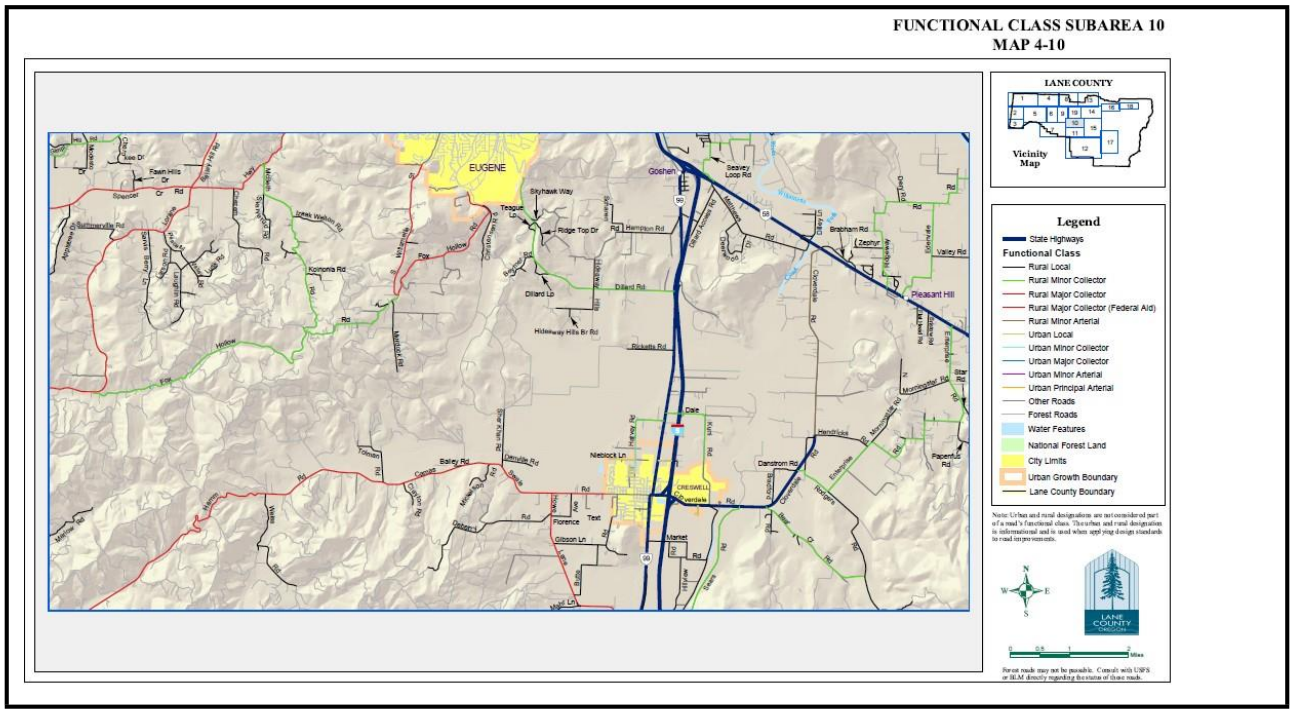
The following maps depict Lane County's existing transportation system to explain the location of existing facilities in relationship with lands outside the UGB. The maps also depict topography as it relates to the location of the rural road network. Topography is a constraint that influences and places limitations on potential transportation extensions to lands beyond the existing UGB and to potential connectivity with lands inside the existing UGB.

Lane County TSP Functional Class Subarea 14



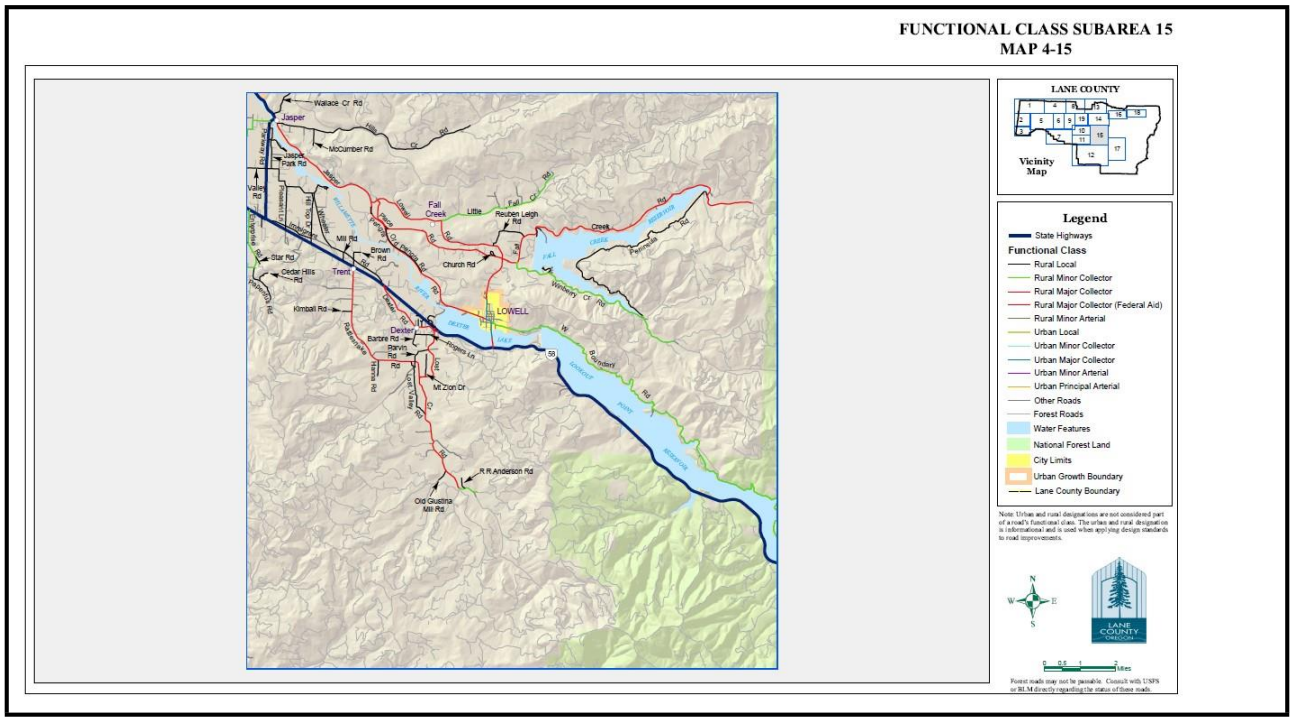
The preceding map depicts Lane County's rural road network proximate to the **Far East, Thurston, Mohawk, Oxbow/Camp Creek, South Hills, Wallace Creek,** and **Clearwater** second priority exception areas. The preceding map depicts Lane County's rural road network in the vicinity of the **Mohawk, Wallace Creek** and **Oxbow/Camp Creek** third priority marginal land areas.

Lane County TSP Functional Class Subarea 10

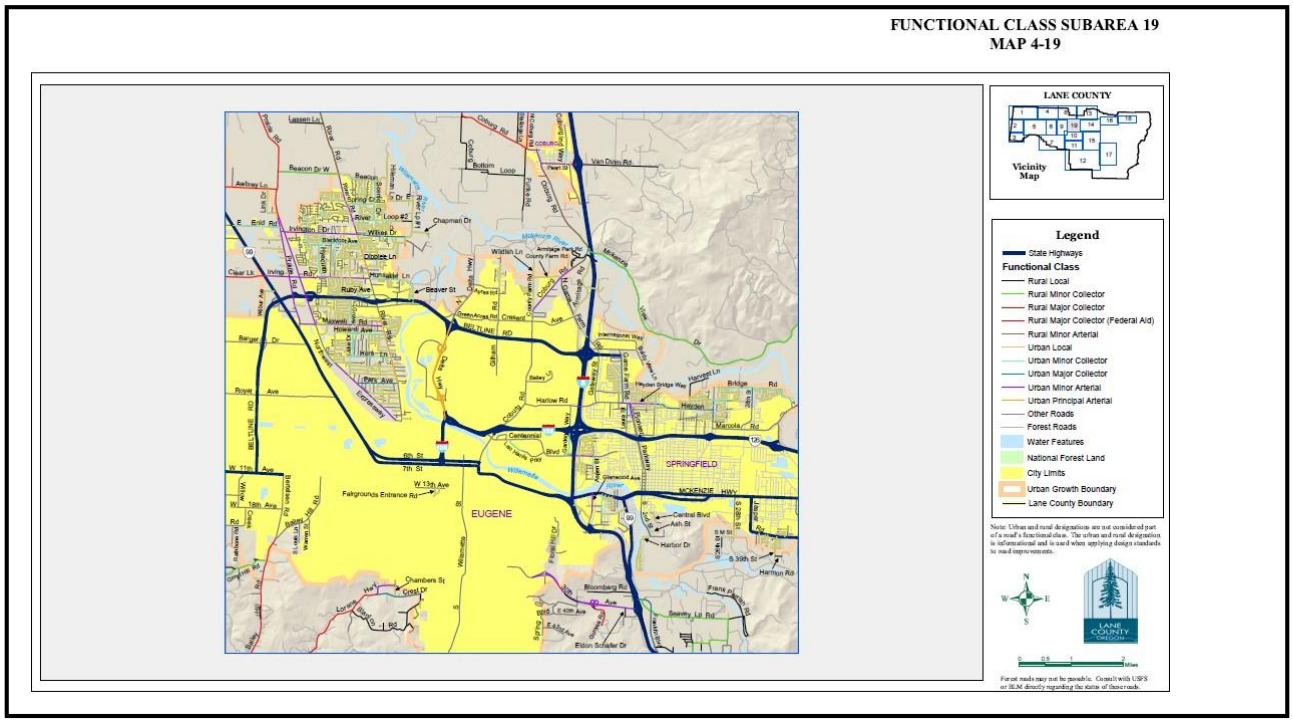


The preceding map depicts Lane County's rural road network in the vicinity of the **Seavey Loop,** and **Seavey Loop/Goshen** second priority exception areas.

Lane County TSP Functional Class Subarea 15


FUNCTIONAL CLASS SUBAREA 15
MAP 4-15
LANE COUNTY
Vicinity Map
Legend
State Highways
Functional Class
Rural Local
Rural Minor Collector
Rural Major Collector
Rural Major Collector (Federal Aid)
Rural Minor Arterial
Urban Local
Urban Minor Collector
Urban Major Collector
Urban Minor Arterial
Urban Principal Arterial
Other Roads
Forest Roads
Water Features
National Forest Land
City Limits
Urban Growth Boundary
Lane County Boundary
Jasper
Wallace Cr Rd
McCumber Rd
Jasper Park Rd
Fall Creek
Little
Reuben Leigh Rd
Mill Rd
Brown Rd
Church Rd
Star Rd
Cedar Hills Rd
Trent
Kimball Rd
LOWELL
Dexter
Barbre Rd
Parvin Rd
Mt Zion Dr
R R Anderson Rd
Old Gustina Mill Rd
Winberry Cr Rd
Brandard Rd
Pengra Rd
Valley Rd
Lost Valley Rd
Kiphuts Rd
Rattlesnake Rd
Dexter Rd
Jasper Rd
Fall Creek Rd
Lowell Rd
Pengra Rd
Dexter Rd
Jasper

Lane County TSP Functional Class Subarea 19



The preceding map depicts Lane County's rural road network in the vicinity of the **McKenzie View** and **Seavey Loop** second priority exception areas.

Public Services Analysis of Potentially Suitable Second Priority Land

Table 5 summarizes and compares the opportunities and constraints associated with constructing public facilities and providing public services to lands in the vicinity of the Springfield UGB. The information summarized in Table 5 is based on information received from City engineering and transportation staff, the Springfield CIBL Technical Advisory Committee (TAC), service providers, public agency staff that were consulted with throughout the multi-year urbanization study process, and the public facilities plans identified in the previous sections of this report. In the Public Facilities and Services Analysis, the City identified physical constraints, engineering constraints, including legal constraints that affect orinfluence the physical placement of wastewater or stormwater management facilities.

The analysis includes a high planning level assessment of the relative degree of difficulty of providing public facilities and services. Early in the iterative multi-year analysis process, engineering and transportation staff, public service agency staff were asked to assign a numeric value ranging from 1-5 to assess and compare the relative degree of difficulty of providing public facilities and services to an area with 1= EASIER, 3=MEDIUM DIFFICULT, 5=DIFFICULT.[44] The relative rankings assigned were based on conceptual-level discussion of the wastewater, transportation, and stormwater improvements that would likely be needed to provide these public services to serve general areas, not individual parcels. Relative degree of difficulty addressed providing services to the edge of an area and did not include providing services internally within an area. These discussions and assessments were not based upon detailed analysis and are therefore subject to change. Cost of service was not estimated or evaluated at this point in the analysis.

The City relied on the findings in Table 5 —as further documented by referenced facility plans, maps and supplemental evidence in the record — to determine whether *potentially suitable* candidate second priority lands can be served with public water, wastewater, stormwater, and transportation including public transit systems within the 2010-2030 planning period based on physical constraints. In this step, the City excluded lands it deemed not serviceable based on physical constraints — and therefore not suitable — from further consideration in the UGB Alternatives Analysis.

The City's evaluation of alternatives and its conclusions regarding serviceability and thus suitability are based on a comparative analysis of physical facilities and services constraints that is appropriate for this level of planning. The City applied service comparison factors uniformly to the land under each priority. The City's conclusions regarding which lands to exclude are reasonable and supported by evidence.

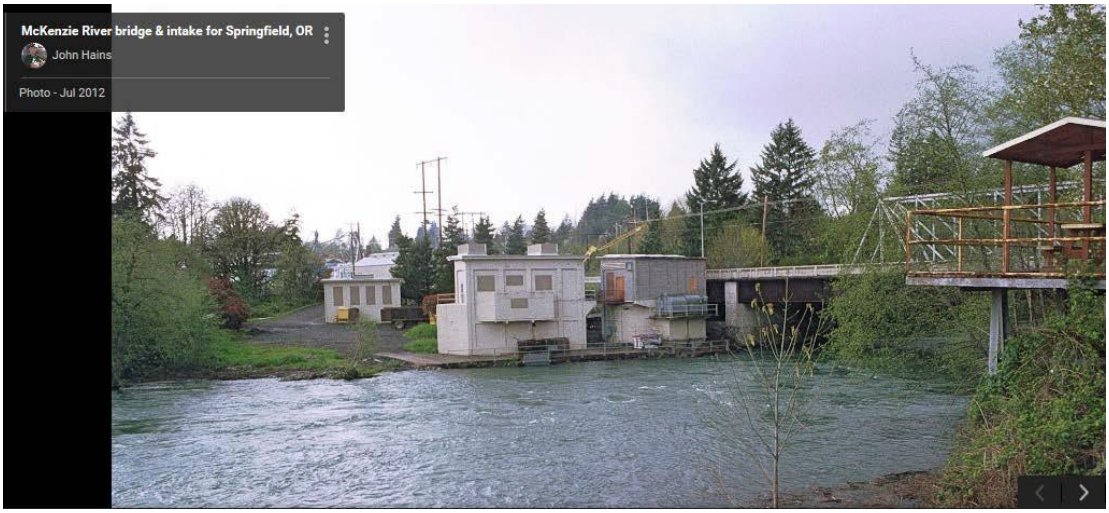
[44] Draft Buildable Lands Inventory, 12/11/09 by City Engineer Ken Vogeney, input from Springfield Utility Board

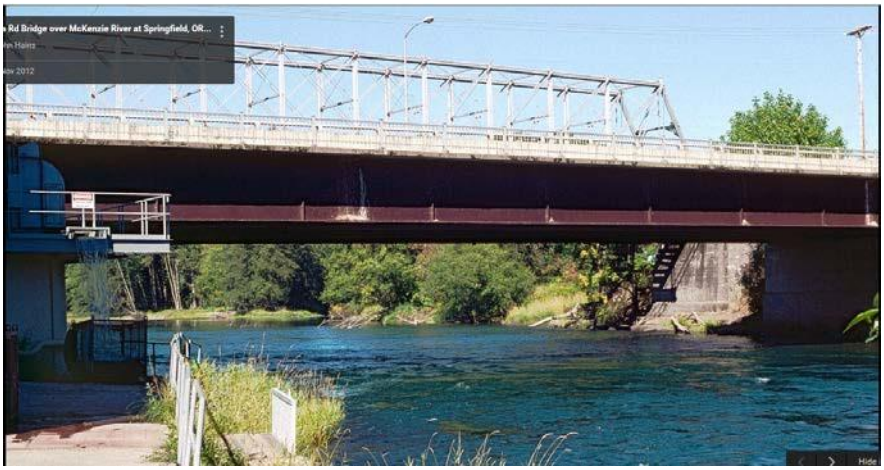
Table 5: Second Priority Land Public Facilities and Services Analysis Summary	
McKenzie View B Exception Parcels:	
Water	**5 Difficult** • isolated by distance and topography from existing urban services • Separated from urban services by the McKenzie River, must cross river with urban services • Would need to bore under river (if permitted) to extend public water service main • Nearest water transmission line is a 24" line in the vicinity of 28th Street/Yolanda, approximately 6,000-8000 feet from the parcels
Wastewater	**5 Difficult** • Isolated by distance and topography from existing urban services • Separated from urban services by the McKenzie River, must cross river with urban services • Nearest collection system is across the river and more than 2,000 feet away: a 15" line in Vera Street. • Would need to upgrade Vera pump station. • Would need to bore under river (if permitted) to extend service main, then gravity flow to East Springfield interceptor.
Stormwater	**3 Medium Difficult** • Separated from urban services by the McKenzie River • No developed system or outfalls in vicinity • New stormwater outfalls will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands. • The McKenzie River is federally classified as critical salmonid habitat.
Transportation (including transit service)	• Isolated by distance and topography from existing urban services • Access to exception parcels from Springfield and I-5 is via McKenzie View Drive, a Rural Minor Collector – approximately 4.5 miles from UGB at Game Farm Rd.; or across the McKenzie River via Marcola Rd. (Rural Major Collector, 46-36' wide), Old Mohawk Rd. (Rural Minor Collector), and Hill Rd. (Rural Minor Collector) - approximately 5 miles from UGB at Hayden Bridge. • All roads will need improvement to accommodate industrial or commercial development and multi-modal access • Upgrade McKenzie View Drive to urban standards and provide capacity improvements • Marcola Road: "With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length." [45] • No transit services, pedestrian facilities or ADA access in area. • Same findings as Mohawk re upgrades to 42nd St., 42nd/Marcola intersection and 42nd and Hwy 126 interchange
Urban services conclusion/	The City excluded the **McKenzie View Exception** parcels from consideration because this areas does not provide and cannot reasonably be expected to be provided with

[45] *Lane County Weight Restricted Bridges and Approved Route List* (Revised 02-2014), http://www.odot.state.or.us/forms/motcarr/od/4020.pdf, website accessed 2-5-16

physical constraints **McKenzie View Exception**	the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield's identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).
Mohawk A, B, and C Exception Parcels:	
Water	**5 Difficult** • B and C are isolated by distance and topography from existing urban services • Separated from urban services by the McKenzie River, must cross river with urban services • River is a barrier to extension of water transmission that makes extension of public water system infeasible[46] • Nearest water transmission line is a 16" line at Marcola Rd. /Hayden Bridge

Photos: EWEB Intake at Hayden Bridge and existing Hayden Bridge (Marcola Road crossing McKenzie)





[46] See email from City Civil Engineer Clayton McEachern P.E., to Linda Pauly, dated 2/8/16 describing physical constraints to extending a water transmission line across the McKenzie River either via the existing bridge or by boring underwater.

Wastewater	**5 Difficult** • B and C are isolated by distance and topography from existing urban services • Separated from urban services by the McKenzie River, must cross river with urban services • Will require pumping across the river and expanding capacity in existing sewer in Marcola Road (existing UGB). Geology precludes boring under river in this location. A line rupture in this location could contaminate Eugene's water supply. • Would require new trunk line from North Springfield Interceptor to and along Hayden Bridge Rd and new pump stations inside area to get flow to new trunk. Bridge is high point. Pump stations are needed to bring flow up to bridge and across river, then gravity flow to interceptor. • Nearest collection system is a 10" line in Marcola Rd., more than 4,000 feet from Mohawk A, 3 miles to Mohawk B parcels, and 4 miles to Mohawk C parcels • Mohawk C parcels are located more than 2 miles from UGB
Stormwater	**5 Difficult** • Separated from urban services by the McKenzie River • No new outfalls permitted upstream from Hayden Bridge (Three Basin Rule[47]) • Eugene Water and Electric Board's water intake at Hayden Bridge would require significant separation from any new outfalls developed downstream from the intake[48] • No developed system in vicinity • Mohawk C parcels >2 miles from UGB
Transportation (including transit service)	**4 Difficult** • B and C are isolated by distance and topography from existing urban services • Access to exception parcels from Springfield is across the McKenzie River via 42nd Street and Marcola Rd. (Rural Major Collector, 46-36' wide), Old Mohawk Rd. (Rural Minor Collector/Rural Local Collector, 30' wide), and Camp Creek Rd. (Rural Major Collector, 30' wide). [49] [50] Roads may need improvement to accommodate additional development and provide multi-modal access: • Upgrade 42nd St. to urban standards[51] • Upgrade 42nd/Marcola intersection • May need to upgrade 42nd and OR 126 interchange[52] • Upgrade Camp Creek to urban standards and provide capacity improvements • Would require internal collector street system. • Existing bridge in place, but would need to be improved to provide full urban standards including multi-modal access. • Urban standards and capacity improvements needed on existing and future collector

[47] OAR 340-041-0350(1)(b) prohibits new or increased waste discharges that require NPDES permit, WPCF permit, or 401 Certification to the waters of the McKenzie River Subbasin above the Hayden Bridge (river mile 15).

[48] See email from City Civil Engineer Clayton McEachern P.E., describing physical factors that preclude construction of new stormwater outfalls in the vicinity of EWEB's Hayden Bridge McKenzie River water intake facility.

[49] Source of Functional Classifications: 2004 Lane County Transportation System Plan Functional Class Subarea 14 Map 4-14

[50] Source of road widths: Lane County Roads Inventory, http://www.lanecounty.org/Departments/PW/TransPlanning/Documents/AppendixB_RoadsInventory.pdf Accessed January 26, 2016

[51] Project # R-41 42nd St. from Marcola Rd. to railroad tracks is listed as a "20-year priority project" in the Springfield 2035 TSP Attachment A.

[52] See ODOT staff Helton email to staff Reesor, Dec. 29, 2008: "The interchange on Hwy 126 at 42nd St. has failing segments even with planned improvements, but it can probably be made to operate with additional improvements to the local system." Project #R-35 is identified as a "Beyond 20-year Project" in the 2035 Springfield TSP, Appendix A, p. 14.

	system from Mohawk/Highway 126 interchange to area, including Hayden Bridge Rd, 19th St, 23rd St, and 31st St • Previous ODOT study showed a need for upgrading at Hwy 126 and 42nd St. (without UGB expansion). Traffic backs up at the 42nd St. rail crossing at entrance to the IP plant, causing delays with access to Hwy 126. • Isolated from I-5 interchange. Mohawk A parcels are located 1 mile from Highway 126/I-105, and 5 miles from I-5; Mohawk C parcels >2 miles from UGB • Steep slopes east of Marcola Rd. • Access to Mohawk A, B and C would route traffic through farmland and rural residential areas • Marcola Road and Old Mohawk Road: "With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length." [53] • No transit services, pedestrian facilities or ADA access in area. Nearest service is Route 17 Hayden Bridge Rd. and 19th Street. Route Description: **"**The route begins at Springfield Station (Bay B) and travels North on 5th Street where it serves Springfield City Hall and Library and the Fred Meyer Shopping Center. The bus travels East on Hayden Bridge Place, North on 7th Street, West on Hayden Bridge Road, and South onto 19th Street where it serves Mohawk Marketplace. The bus travels West on Q Street and South on 5th Street to return to Springfield Station."[54]
Urban services conclusion/ physical constraints **Mohawk Exception**	The City excluded the **Mohawk Exception** parcels from consideration because these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield's identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in 660-009-0005(9).
Oxbow/Camp Creek Exception Parcels	
Water	**5 Difficult** • Isolated by distance and topography from existing urban services • Separated from urban services by the McKenzie River, must cross river with urban services • Nearest water transmission line is a 16" line Marcola Rd. /Hayden Bridge • River is a barrier to extension of water transmission that makes extension of public water system infeasible [55] • Same findings as Mohawk

[53] *Lane County Weight Restricted Bridges and Approved Route List* (Revised 02-2014), http://www.odot.state.or.us/forms/motcarr/od/4020.pdf, website accessed 2-5-16.

[54] Email from LTD staff Will Mueller, dated June 28, 2013 provides comments describing the physical requirements necessary to provide transit service applicable to extending transit service to any new areas: "Connecting roadways and streets would need to be constructed to city standards that support LTD's buses including sufficient lane width, intersection curb radii, and sidewalk width at prospective bus stops to meet ADA standards in effect at time of construction (2013 standards require 8' sidewalks at bus stops).

[55] See email from City Civil Engineer Clayton McEachern P.E., to Linda Pauly, dated 2/8/16 describing physical constraints to extending a water transmission line across the McKenzie River either via the existing bridge or by boring underwater.

Wastewater	**5 Difficult** • Isolated by distance and topography from existing urban services • Separated from urban services by the McKenzie River, must cross river with urban services • Would require pumping across the river and expanding capacity in existing sewer in Marcola Road (existing UGB). Geology precludes boring under river in this location. • EWEB intake at Hayden Bridge is the intake for the City of Eugene's water supply. • Would require new trunk line from North Springfield Interceptor to and along Hayden Bridge Rd and new pump stations inside area to get flow to new trunk. Bridge is high point. Pump stations are needed to bring flow up to bridge and across river, then gravity flow to interceptor. • Nearest collection system is a 10" line in Marcola Rd., more than 4,000 feet from Hayden Bridge, and approximately 6,000 feet to the westernmost parcel. • Eastern Camp Creek parcels approximately 5 miles from nearest wastewater connection via Hayden Bridge/Marcola Rd. or via Hendricks Bridge/Main Street. • Same findings as Mohawk
Stormwater	**5 Difficult** • Separated from urban services by the McKenzie River • No new outfalls permitted upstream from Hayden Bridge (Three Basin Rule)[56] • EWEB intake at Hayden Bridge is the intake for the City of Eugene's water supply. • No developed system or existing discharge permits in vicinity • Same findings as Mohawk are applicable
Transportation (including transit service)	**5 Difficult** • Isolated by distance and topography from existing urban services • Access to exception parcels from Springfield and I-5 is across the McKenzie River via Marcola Rd. (Rural Major Collector, 46-36' wide), Old Mohawk Rd. (Rural Minor Collector/Rural Local Collector, 30' wide), and Camp Creek Rd. (Rural Major Collector, 30' wide). Roads may need improvement to accommodate additional development and multi-modal access: • Upgrade 42nd St. to urban standards • Upgrade 42nd/Marcola intersection • Upgrade 42nd and Hwy 126 interchange • Upgrade Camp Creek to urban standards and provide capacity improvements • Would require internal collector street system • Marcola Road: "With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length." [57] • No transit services, pedestrian facilities or ADA access in area. • Same findings as Mohawk are applicable
Urban services conclusion: **Oxbow/Camp**	The City excluded the **Oxbow/Camp Creek Exception** parcels from consideration because these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation

[56] OAR 340-041-0350(1)(b) prohibits new or increased waste discharges that require NPDES permit, WPCF permit, or 401 Certification to the waters of the McKenzie River Subbasin above the Hayden Bridge (river mile 15).

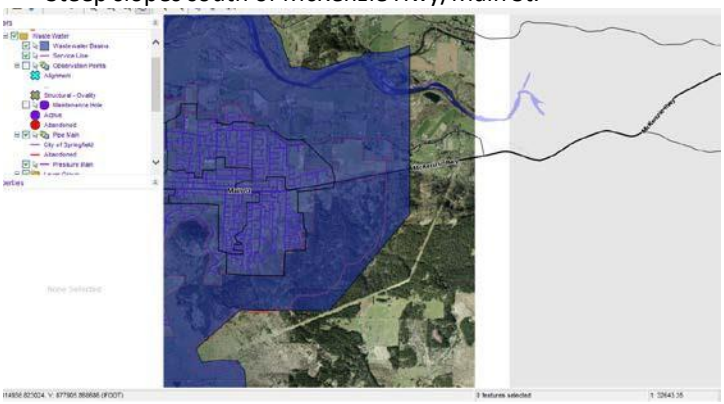
[57] *Lane County Weight Restricted Bridges and Approved Route List* (Revised 02-2014), http://www.odot.state.or.us/forms/motcarr/od/4020.pdf, website accessed 2-5-16

Creek Exception	infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield's identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).
Jasper Bridge Exception Parcels	
Water	**A: 5 Difficult** **B: 4 Difficult** • Isolated by distance and topography from existing urban services • Must cross Willamette River with urban services to serve Jasper Bridge A (west side) parcels. • The nearest water transmission line is 2-3 miles from the exception parcels: the 24" "Natron" water line, extended in 2013 to the SW corner of the school district property. The 16" line at Westwind/Linda Lane provides a looped system. • A planned 24" line will extend south from Weyerhaeuser Haul Rd. to serve the SE portion of the UGB.
Wastewater	**5 Difficult** • Isolated by distance and topography from existing urban services • The nearest sewer is 2-3 miles from these parcels. The Jasper Trunk terminus at S. 57th is a 12" main. Nearest 27" main is at 42nd St. Multiple pump stations would be needed, or a new treatment facility if permitting would allow. • Would require pump stations and trunk line extensions to cross Willamette River to serve west side parcels. • Jasper trunk sewer may not have adequate capacity to serve industrial uses, so a new parallel trunk may be necessary • May be more feasible to serve from Pleasant Hill if a public collection/treatment system is developed for that area in the future • Geology may allow boring under river in this location
Stormwater	**2 Easier** • Physical connections to the Middle Fork Willamette River system can be made with little or no impact on existing stormwater systems. This area would be a new basin. • Development of the area may require land acquisition to safely convey stormwater runoff to the river. • Would require new outfall(s) to Willamette River. • New stormwater outfalls will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands. • The Middle Fork Willamette River is federally classified as critical salmonid habitat.
Transportation (including transit service)	**5 Difficult** • Isolated by distance and topography from existing urban services • Access from Jasper Road but urban standards and capacity improvements would be necessary.[58] • Topography limits expansion of Jasper Rd.

[58] Project #US-12 Jasper Road-South 42nd Street to northwest of Mt.Vernon Road, and Project # US-13 Bob Straub Parkway – Mt. Vernon Rd to UGB are identified as a "Beyond 20-year Projects," TSP Projects Located on Lane CO Facilities list, in the 2035 Springfield TSP, Attachment A.

	• West side parcels: The existing 1952 metal truss Jasper Bridge[59] has low service life and would need to be upgraded or replaced to handle increased traffic generation and to provide multi-modal access to Jasper Bridge A west side parcels. • Connection to Hwy 58 but limited connection to Hwy 126/I-5 • Need to further study capacity at the I-5/Hwy 58th interchange. Improvements may be needed depending on size and location of expansion area."[60,61] • Access to west side parcels would route traffic through existing rural residential development on Edenvale Rd. • County facilities Jasper – Lowell Road, Jasper Rd. and Hills Creek Road: "With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length." [62] • Needs internal collector system • "Main St/Straub Parkway intersection is failing today even with planned interchange improvements", and there are safety issues with signal. Traffic would need to be distributed differently. Significant development would need to participate in funding of ODOT IAMP. Impacts to the OR126/Main St intersection should be considered. ODOT's previous analysis indicate that the OR 126/Main St, Main St/54th St. and Main St/58th St all exceed capacity by 2031. [63] [64] • Bob Straub Parkway – Mt. Vernon to UGB needs to be improved to a three-lane cross section with sidewalks and bike facilities.[65] • No pedestrian facilities or ADA access in area. • Nearest public transit service is at Thurston Station on Main Street, >3 miles away.[66]
Urban services conclusion: **Jasper Bridge Exception**	The City excluded the **Jasper Bridge Exception** parcels from consideration because these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield's identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).

[59] Jasper Bridge (ODOT 04117A) is identified in the ODOT *2015 Bridge Condition Report* as "Low Service Life", a candidate for repair or replacement; bridge #07890 at MP 5.64 has timber substructure deficiencies.
[60] Comments received from ODOT Region 2, Area 5 staff Savannah Crawford, email dated June 18, 2013.
[61] Interchange improvements at Main St/Hwy 126 and Highway 126 at 52nd are listed as financially constrained projects in the Regional Transportation Plan (RTP).
[62] *Lane County Weight Restricted Bridges and Approved Route List* (Revised 02-2014), http://www.odot.state.or.us/forms/motcarr/od/4020.pdf, website accessed 2-5-16
[63] Comment received ODOT staff Crawford, meeting on June 11, 2013 and email dated June 18, 2013.
[64] Project #R-58 OR 126/52nd St Interchange Improvements and #R-59 and R-43 OR 126/Main Interchange Improvements are identified as "20-year Priority Projects" in the 2035 Springfield TSP, Attachment A, p.9. Est. cost of #43 is 50 million.
[65] Project #US-13 is identified as a "Beyond 20-year Project," list of TSP Projects Located on Lane CO Facilities, Springfield 2035 TSP, Attachment A.
[66] Email from LTD staff Will Mueller, dated June 28, 2013 provides comments describing the physical requirements necessary to provide transit service applicable to extending transit service to any new areas: "Connecting roadways and streets would need to be constructed to city standards that support LTD's buses including sufficient lane width, intersection curb radii, and sidewalk width at prospective bus stops to meet ADA standards in effect at time of construction (2013 standards require 8' sidewalks at bus stops).

Far East Exception A and B Parcels	
Water	**A: 1 Easier** • The nearest transmission line is the 12" line terminating ½ mile east of the existing UGB on Main St/Hwy 126, approximately ½ mile from exception parcel 1702336241500. **B: 5 Difficult** • Separated from urban services by distance and topography. • The nearest transmission line is the 12" line terminating ½ mile east of the existing UGB on Main St/Hwy 126. • Distant from SUB service area. • Higher elevation would require pumping and reservoir.
Wastewater	**A: 1 Easier** **B: 5 Difficult -** Separated from urban services by distance and topography. • May require a new pump station at bottom of Cedar Flat/126 and force main to bring gravity flow to Thurston trunk sewer. May need to be a stepped system to address topography. • New or upgrade trunk line may be needed in Thurston Rd. from North Springfield interceptor at International Paper (unfunded upgrade project is identified in CIP). • Steep slopes south of McKenzie Hwy/Main St.  City of Springfield wastewater basin (shown in blue)and service main in relationship with **Far East, Thurston** and **Oxbow/Camp Cree**k areas
Stormwater	**A: 3 Medium Difficult** **B: 5 Difficult** • No developed system in vicinity • Cedar Creek drainage basin is nearing stormwater receiving capacity[67], [68] (unfunded upgrade project is identified in CIP). • No new outfalls permitted on McKenzie River upstream from Hayden Bridge (Three Basin Rule) [69]

[67] *City of Springfield Stormwater Facilities Master Plan*, Oct. 2008; *City of Springfield Stormwater Management Plan,* updated 2010, http://springfield-or.gov/ESD/stormwater%20management%20plan%202008.pdf, accessed 2/8/16.

[68] City of Springfield Stormwater Basin Characterization Study, Lane Council of Governments, 2008, pp. 17-26 describes existing outfalls and water quality concerns in this basin.

[69] OAR 340-041-0350(1)(b) prohibits new or increased waste discharges that require NPDES permit, WPCF permit, or 401 Certification to the waters of the McKenzie River Subbasin above the Hayden Bridge (river mile 15). The McKenzie supports anadromous and resident fish species and is considered "essential fish habitat" for threatened and endangered species (Table 11, p. 20).

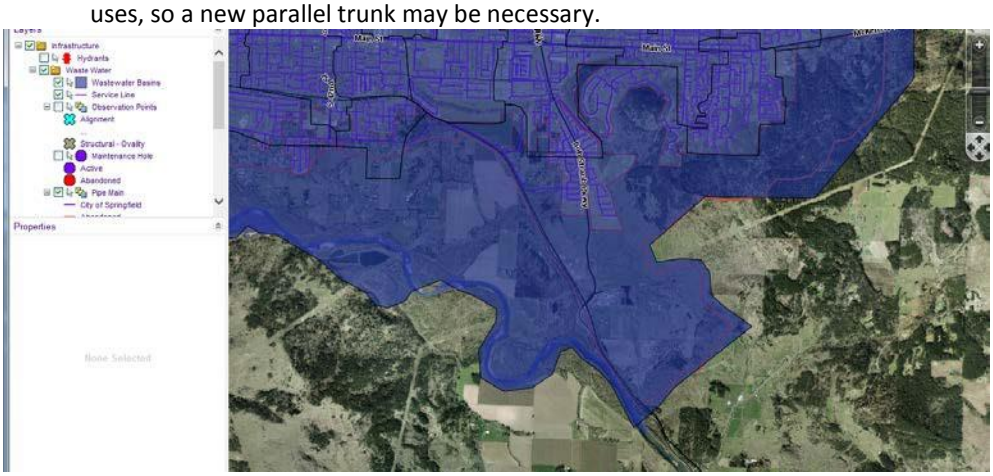
	• Sensitive environmental protection/salmonid species habitat restoration projects will limit/restrict new outfalls • Ability to manage stormwater on-site will be limited by high water table and typically[70] requires 8-10% of parcel area.
Transportation (including transit service)	**A: 1 Easier** **B: 5 Difficult.** Separated from urban services by distance and topography. • Access to A and B from E. Main Street/McKenzie Hwy (State Highway) and Thurston Road (Rural Major Collector). • Two new bridges would be needed over Cedar Creek on 66th and Weaver Lane. • 66th St., Weaver Lane and Billings Rd. would require urban standards improvements and capacity upgrades. • Extend Billings Rd. to E. Main St. • Upgrade capacity on 66th St. from Main St. to Thurston Rd. • Upgrade capacity on Thurston Rd. and provide urban standards from 69th St. to E. Main Street • Improve Thurston Rd between Weaver Rd. and UGB[71] • Intersection improvements at Thurston Rd. and E. Main St. • Would need internal collector street system • Access to Exception C from Cedar Flat Road, Rural Local Collector • slopes between E. Main Street/McKenzie Hwy and parcels limit constrain options • "Main St/Straub Parkway intersection is failing today even with planned interchange improvements", and there are safety issues with signal. Traffic would need to be distributed differently. Significant development would need to participate in funding of ODOT IAMP. Impacts to the OR126/Main St intersection should be considered. ODOT's previous analysis indicate that the OR 126/Main St, Main St/54th St. and Main St/58th St all exceed capacity by 2031. [72], [73]
Urban services conclusion: **Far East Exception**	**Far East Exception A parcels** were considered physically serviceable during the 20-year planning period ending 2030, as defined in OAR 660-009(9). The relative proximity of the easternmost parcels in this area to existing water, wastewater and transportation facilities suggests that water and wastewater facilities could be extended or upgraded to have adequate capacity within the 20-year planning period. The City excluded the **Far East Exception B** parcels from consideration because this area does not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield's identified industrial and commercial land use needs during the 20-year planning period ending 2030, as

[70] *Eugene Stormwater Management Manual* "Simplified Method", Appendix C, is a rule of thumb Springfield engineers use for typical small developments.

[71] Project #US-14 is identified in the 2030 Springfield TSP as a Priority Project on the 20-year project list, Projects on Lane CO. Facilities, Attachment A, with an estimated cost of $4,800,000.

[72] Comment received ODOT staff Crawford, meeting on June 11, 2013 and email dated June 18, 2013.

[73] Interchange improvements at Main St/Hwy 126 and Highway 126 at 52nd are listed as financially constrained projects in the Regional Transportation Plan (RTP) and are identified as 20-year Priority Projects in the 2035 Springfield TSP, Attachment A .

	defined in OAR 660-009-0005(9).
Wallace Creek Exception Parcels	
Water	**5 Difficult** • Separated from urban services by distance and topography. • Exception parcels are located more than 3 miles from the nearest water main. • The nearest water transmission line is the 24" "Natron" water line, extended in 2013 to the SW corner of the school district property. The 16" line from Westwind/Linda Lane provides a looped system. • A planned 24" line will extend south from Weyerhaeuser Haul Rd. to serve the SE portion of the UGB. • Wallace Creek Rd. narrow, winding corridor alignment and topography preclude infrastructure extensions. Extension along Weyerhaeuser Haul Road alignment may be a possible alternative. • No developed system in vicinity
Wastewater	**4 Difficult** • Isolated by distance and topography from existing urban services • No developed system in vicinity. • Wallace Creek Rd. narrow, winding corridor alignment and topography preclude infrastructure extensions. Extension along Weyerhaeuser Haul Road alignment may be a possible alternative to serve parcels in Haul Road area. • The nearest sewer is 2-3 miles from the parcels. The Jasper Trunk terminus at S. 57th is a 12" main. Nearest 27" main is at 42nd St. • It is anticipated one or two additional small pump stations may be needed to serve some portions of the area depending upon future development configuration and topography. • Jasper trunk sewer may not have adequate capacity to serve additional industrial uses, so a new parallel trunk may be necessary.  City of Springfield wastewater basin (shown in blue)and service main in relationship with **Wallace Creek**, **South Hills, West Jasper Mahogany,** and **Jasper Bridge** areas
Stormwater	**5 Difficult** • Upgrade existing Wallace Creek outfall to Middle Fork Willamette River • No developed system in vicinity • Physical connections to the Middle Fork Willamette River system can be made with little or no impact on existing stormwater systems. • Development of the area will require land acquisition to safely convey stormwater runoff to the river if lands are not bordering Wallace Creek • New stormwater outfalls will involve several other regulatory agencies because the

	work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands. • Stormwater management through the use of on-site retention and/or infiltration would be challenging given the sloped topography and location relative to Springfield Utility Board's Willamette well field. • The Middle Fork Willamette River is federally classified as critical salmonid habitat.
Transportation (including transit service)	**3 Medium Difficult** • Isolated by distance and topography from existing urban services • Access limited to one way in/out • Existing rail crossing at Jasper Rd/Wallace Creek Rd. is substandard. Upgrade would be needed. An at-grade crossing may not be feasible in this location. Existing traffic waiting to cross backs into Jasper Rd. 24 trains/day. • Wallace Creek Road will need improvement to urban standards. The existing narrow, winding alignment through sloped topography is a constraint. • DOGAMI SLIDO mapped landslide hazard area • Access via Jasper Rd., but urban standards and capacity improvements needed[74]: Improvement of the entire length of Jasper Road to urban standards and upgrade to 4 lanes to Main Street via South 42nd Street, including Union Pacific mainline crossing upgrades on South 42nd Street and intersection upgrades along the length of the entire corridor. • Topography limits expansion of Jasper Rd. • May trigger capacity improvements (4-lane section) for Bob Straub Parkway: Improvements to Bob Straub Parkway from Jasper Road to Daisy Street, upgrading to 4 lanes. • Intersection improvements will be needed at Bob Straub Parkway and Daisy Street. [75] • Jasper Rd. & Straub Parkway: "With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length." • Intersection improvements will be needed at Bob Straub Parkway and Jasper Road, which will include a new traffic signal. • A new road connection from Bob Straub Parkway to Jasper Road will be needed in the vicinity of the Webb property (Tax Lot 1802090000103), which will include a new grade separated crossing over the railroad. • Connection to Hwy 58 but limited connection to Hwy 126/I-5 • Need to further study capacity at the I-5/Hwy 58th interchange. Improvements may be needed depending on size and location of expansion area." [76] • Nearest transit service is at Thurston Station on Main Street, >3 miles away.[77] No transit services, pedestrian facilities or ADA access in area. • "Main St/Straub Parkway intersection is failing today even with planned interchange improvements", and there are safety issues with signal. Traffic would need to be distributed differently. Significant development would need to participate in funding of ODOT IAMP. Impacts to the OR126/Main St intersection should be considered.

[74] See Jasper Bridge exception area

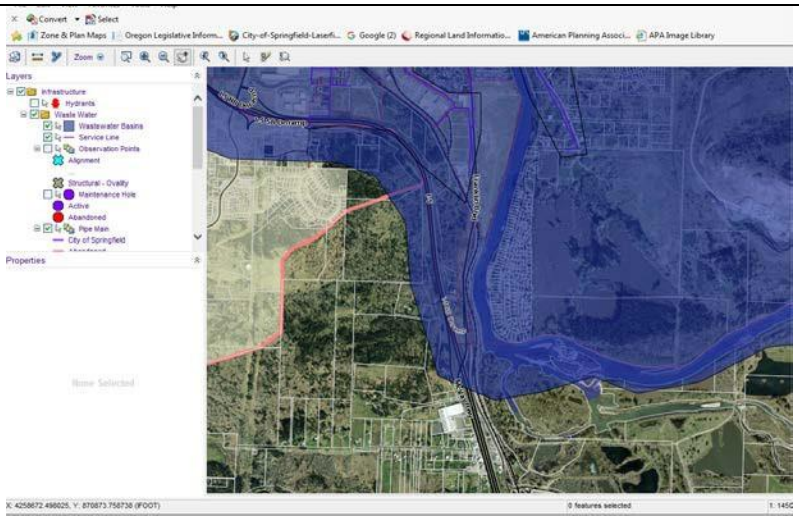
[75] Project #R-44 is identified as a "Beyond 20-year Project" in the 2035 Springfield TSP

[76] Comments received from ODOT Region 2, Area 5 staff Savannah Crawford, email dated June 18, 2013.

[77] Email from LTD staff Will Mueller, dated June 28, 2013 provides comments describing the physical requirements necessary to provide transit service applicable to extending transit service to any new areas: "Connecting roadways and streets would need to be constructed to city standards that support LTD's buses including sufficient lane width, intersection curb radii, and sidewalk width at prospective bus stops to meet ADA standards in effect at time of construction (2013 standards require 8' sidewalks at bus stops).

	ODOT's previous analysis indicate that the OR 126/Main St, Main St/54th St. and Main St/58th St all exceed capacity by 2031. [78, 79]
Urban services conclusion: **Wallace Creek Exception**	The City excluded the **Wallace Creek** exception parcels from consideration because the area does not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses in this location. Providing service to the area will present significant challenges not only in the length of improvements, but also the multiple at grade railroad crossings that will likely be needed along Jasper Road and Wallace Creek Rd. In addition, Jasper Road will likely need to be upgraded to provide capacity for employment development. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield's identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).
Seavey Loop Exception B, C and E Parcels: Second Priority	
Water	**3 Medium Difficult** • Existing public rural water system and service provided by Willamette Water Company • Exception B, C and E parcels are located more than 2 miles from the nearest SUB water main, a 16" line in McVay.
Wastewater	**5 Difficult** • No developed system in vicinity • Isolated by distance and topography from existing urban services • Would require sewer extension from the Franklin/McVay trunk 18" line in Glenwood • B: 2 miles to serve the parcel at south end of College View; C: 2.4 miles to serve Twin Buttes parcels; E: 1.75 miles to 2 miles to serve So. Franklin parcels • Would require upgrades to existing Glenwood MWMC pump station • Would require a new small sized wastewater pump station located near the intersection of 30th Avenue and College View Road. • Would require a new wastewater gravity/pressure main extension from the new pump station at 30th Avenue and College View Road to a new pump station in the vicinity of the intersection of Seavey Loop and Franklin Boulevard, and a gravity main extension along College View Road southerly, ending near the intersection with Franklin Boulevard in order to serve existing properties. • Would require a new small sized wastewater pump station located near the intersection of Franklin Boulevard and Twin Buttes Road. • Wastewater service to this area could become feasible in the future beyond the planning period, however given its removed location from the rest of Springfield, and the number of new pump stations that will likely be needed to provide service, there will be long-term operational costs associated with providing service to this area.

[78] Comments received from ODOT staff Crawford, meeting on June 11, 2013 and email dated June 18, 2013.
[79] Interchange improvements at Main St/Hwy 126 and Highway 126 at 52nd are listed as financially constrained projects in the Regional Transportation Plan (RTP).

	 City of Springfield wastewater basin (shown in blue)and service main in relationship with **Seavey Loop** study area
Stormwater	**5 Difficult** • Isolated by distance and topography from existing urban services • Physical connections to Oxley Slough and/or the Coast Fork Willamette River can be made with little or no impact on existing stormwater systems, although the connection locations may need to be outside of the proposed expansion area. • New stormwater outfalls to Oxley Slough and/or the Coast Fork Willamette River receiving waters will involve several other regulatory agencies because the work would affect riparian areas, excavation in the waters of the state and waters of the United States, and potential wetlands. • While the Coast Fork Willamette River is not federally classified as critical salmonid habitat, the State has designated the Coast Fork Willamette River as essential salmonid habitat. • Stormwater management through the use of on-site retention and/or infiltration may be allowable in this area as it is outside of the zone of contribution for Springfield Utility Board's wells and no other wellhead protection zones have been identified to our knowledge. • Considering the multiple overlapping regulatory jurisdictions for constructing new stormwater outfalls into the Coast Fork Willamette River and/or Oxley Slough, stormwater service for this area may be feasible if on-site stormwater management techniques that maximize stormwater retention and infiltration are required.
Transportation (including transit service)	**5 Difficult** • Proximate to I-5, but access is indirect and limited by the awkward connection and limited capacity at Franklin and 30th Ave. interchange. Access to I-5 at south end is underneath the freeway, via Highway 58/Goshen interchange. • Limited capacity at I-5/30th Street interchange. "Need to further study capacity at the I-5/30th Street interchange and the I-5/Hwy 58th interchange. Improvements at one or both locations may be needed depending on size and location of expansion area." [80]

[80] Comments received from ODOT Region 2, Area 5 staff Savannah Crawford, email dated June 18, 2013.

	• City staff identified a need for an Extension of 30th Avenue as a grade separated to the intersection with Franklin Boulevard and Seavey loop near the southeast corner of the EPUD property. This excludes I-5 interchange improvements or upgrades.[81] • City staff identified a need for the north end of Seavey Loop Rd. to be reconfigured to terminate South of Franklin Boulevard (North of EPUD). • Existing rail underpass at Franklin is very narrow and restricts truck passage. • Opportunities for rail access are unlikely, given the existing infrastructure configuration, lack of siding and narrow width and depth of parcels • Isolated from urban transportation system • May trigger capacity improvements for McVay Highway in Glenwood • Service to this area may be feasible, however there are expected to be some challenges surrounding the 30th Avenue extension and potential for interchange improvements at Interstate 5. • "Difficult to serve with transit except via one-directional route variation from current #92 Lowell/LCC route which only runs 3 trips per weekday."[82] No pedestrian facilities or ADA access in area. I-5, Franklin, and rail overpass at northern entrance to Seavey Loop area

[81] At a meeting of the College View Stakeholder Working Group meeting, ODOT staff David Helton stated that the existing 30th Ave. interchange would likely be sufficient to accommodate traffic from future development in the study area concept (as mapped on that date).

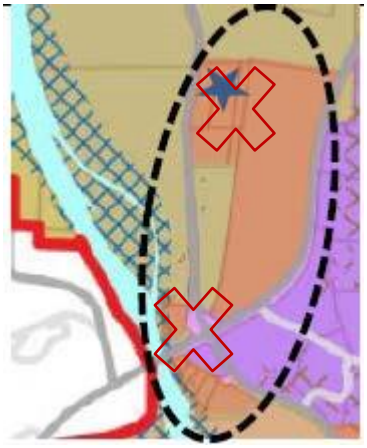
[82] Comments from meeting with Lane Transit District staff Evans, Schwetz, Luftig and ODOT staff Crawford, June 11, 2013.

	 I-5/30th ramp, Franklin Blvd., College View Rd. and railroad corridor Access to I-5 is via South Franklin/Hwy 99, under I-5 overpass, and via Hwy 58 ramp
Urban services conclusion: **Seavey Loop Exception B, C and E**	The City excluded the **Seavey Loop B, C and E** exception parcels from consideration because these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield's identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).

Table 6: Second priority exception parcels excluded: public facilities constraints [ORS 197.298(3)(b)]

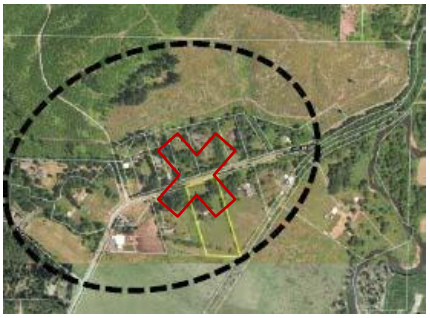
McKenzie View B

Mohawk A

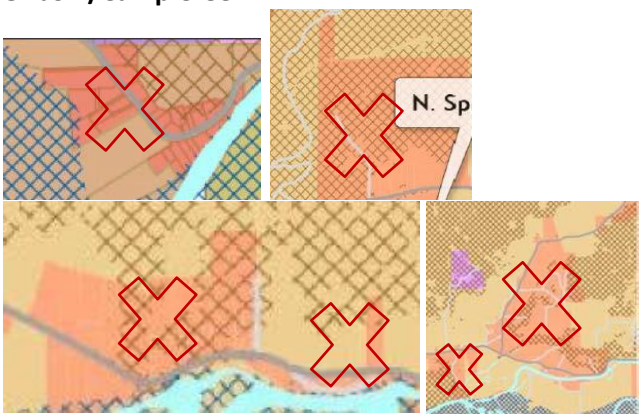


Mohawk B

Mohawk C

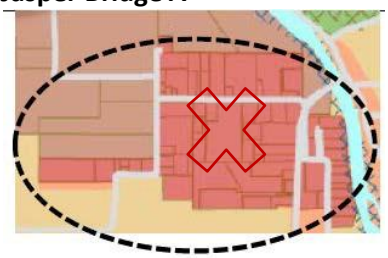


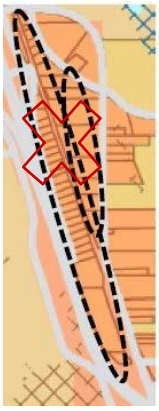
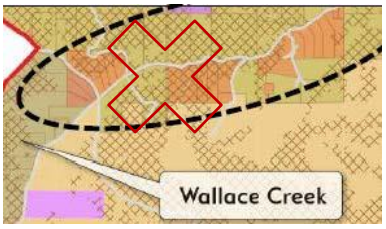
Oxbow/Camp Creek



Far East Springfield B

Jasper Bridge A



Jasper Bridge B	Seavey Loop B	Seavey Loop C
		
Seavey Loop E		**Wallace Creek**
		

In addition to the summary data compiled in Table 5, the record includes studies, facilities master plans, maps, documentation from engineering staff and service providers, demonstrating that the City uniformly evaluated and compared ability to provide urban services to all potentially suitable exception parcels when it identified potentially suitable ORS 197.298 second priority exception land parcels; and that the City conducted the public services analysis in coordination with service providers, including the Oregon Department of Transportation with regard to impacts on the state transportation system.

In addition to the summary data compiled in Table 5, the record includes studies, facilities master plans, maps, documentation from engineering staff and service providers, demonstrating that the City uniformly evaluated and compared ability to provide urban services to all potentially suitable exception parcels all exception parcels as the factual basis to justify excluding ORS 197.298 second priority exception land parcels from further analysis.

Although second priority areas McKenzie View A, West Jasper/Mahogany, Clearwater, Seavey Loop A, D, F, and Seavey Loop/Goshen exception parcels were excluded from further consideration under OAR 660-009-0005(12) above (in Table 4), because they lacked the appropriate site characteristics, areas McKenzie View A, West Jasper/Mahogany, Seavey Loop A, D, F, and Seavey Loop/Goshen exception parcels could

also be dismissed under the public services analysis because providing water, sewer, stormwater and transportation facilities and service would be physically infeasible in the planning period 2010-2030.

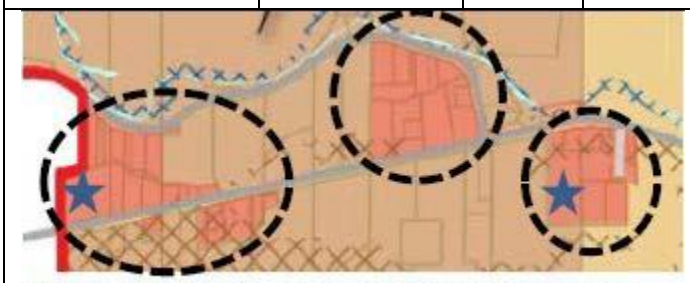
Exception areas excluded based upon specific land needs (197.298(3)(a)) in a previous step: **McKenzie View A*, West Jasper/Mahogany*, Clearwater*, Seavey Loop A*, Seavey Loop D*, Seavey Loop F*, Seavey Loop/Goshen***

Exception areas excluded based upon based upon specific land needs and inability to reasonably provide urban services due to physical constraints (197.298(3)(b)): **Mohawk A, B and C; Oxbow/Camp Creek; Jasper Bridge A and B; Far East B; Wallace Creek; Seavey Loop B, C and E**

After excluding exception areas based upon based upon specific land needs and inability to reasonably provide urban services due to physical constraints (197.298(3)(a) and (b)), one *potentially* suitable and serviceable exception area remains a candidate for UGB expansion: **Far East A.** As shown in Table 7, this area has 2 parcels 5 acres or larger, a total of 13.3 acres. These parcels are not contiguous to one another.

Table 7:
Potentially Suitable & Serviceable Second Priority Exception Land Parcels

Area	# of parcels 5+ ac adjacent to UGB	# of parcels 20+ ac *	# of parcels 5+ ac*	Parcels and unconstrained acres	Zoning
Far East A	2	0	2	1702362401500; 6.4 acres 1701312001500; 6.9 acre slopes <15%, developed residential use, *entire property is sloped >12%[83]	RR2 RR2



Star indicates 5-acre residential parcels

The City relied on the findings in Table 5 —as further documented by referenced facility plans, maps and supplemental evidence in the record — to determine whether *potentially suitable* candidate second priority lands can be served with public water, wastewater, stormwater, and transportation including public transit systems within the 2010-2030 planning period based on physical constraints. In this step,

[83] According to RLID, the mapped NRCS soil series for this parcel is "43E Dixonville-Philomath-Hazelair complex, 12 to 35% slopes

the City excluded lands it deemed not serviceable based on physical constraints — and therefore not suitable — from further consideration in the UGB Alternatives Analysis.

The City's evaluation of alternatives and its conclusions regarding serviceability and thus suitability are based on a comparative analysis of physical facilities and services constraints that is appropriate for this level of planning. The City applied service comparison factors uniformly to the land under each priority. The City's conclusions regarding which lands to exclude are reasonable and supported by evidence.

At this point in the analysis, the City identified two *potentially* suitable first priority land parcels that are physically serviceable within Preliminary Study Area Grouping Far East A, but had not yet evaluated the area through the lenses of Goal 14 Location Factors 3 and 4.

At this point in the analysis, the City determined that the amount of suitable land in the first priority category would not be sufficient to meet the employment land deficiency. The City determined that the need for sites 20 acres and larger cannot be met on second priority land. The City identified two exception parcels in Far East A that are potentially suitable and serviceable to meet need for 5-acre sites if services can be provided within the planning period.

To continue its evaluation of *potentially* suitable exception and land sites to satisfy the employment land need deficiency, the City applied Goal 14 Location Factors 3 and 4. The amount and type of *potentially* suitable first priority land parcels does not exceed the amount necessary to satisfy the need deficiency. The City applied Goal 14 Location Factors 3 and 4 to evaluate *potentially* suitable exception and land sites to satisfy the employment land need deficiency.

OAR 660-024-0060(1)

> *"(b) If the amount of suitable land in the first priority category exceeds the amount necessary to satisfy the need deficiency, a local government must apply the location factors of Goal 14 to choose which land in that priority to include in the UGB."*

ORS 197.298 (1)(b) Goal 14 Location Factor 3 – Second Priority Lands Analysis

To continue its evaluation of *potentially* suitable exception and land sites to satisfy the employment land need deficiency, the City applied Goal 14 Factor 3 to evaluate the Far East A area exception parcels based on comparative ESEE consequences (Goal 14, Boundary Location, Factor 3), and based on compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4).

As previously noted, DLCD staff Gordon Howard provided an outline of the steps to be followed to exclude or include land:

- Exclude lands that are not buildable[84]

[84] "Buildable" is a Goal 10 term. It is the City's position that OAR 660-024-0060 (1) requires the City to consider whether sites are "suitable" at this "buildable" stage in the evaluation process.

- Exclude lands based upon specific land needs (197.298(3)(a));
- Exclude lands based upon inability to reasonably provide urban services due to physical constraints (197.298(3)(b));
- Include lower priority lands needed to include or provide services to urban reserve lands (197.298(3)(c));
- **Exclude lands based upon analysis of comparative ESEE consequences (Goal 14, Boundary Location, Factor 3);**
- **Exclude lands based upon analysis of compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4)**

The City addressed Goal 14 Location Factor 3 as part of the ORS 197.298 evaluation process after making a determination of which exception parcels were potentially suitable based on their size and lack of constraints, and after identifying potentially suitable parcels within a given geographic area grouping that could reasonably be serviceable by 2030. Goal 14 Location Factor 3 requires the City to make a determination that exception area parcels of land selected to be included in an urban growth boundary (UGB) will result in better environmental, social, energy, and economic (ESEE) consequences than the other exception lands of equal priority considered in this step and other alternative sites that were considered for inclusion and rejected. The following section of this report addresses the first application of Goal 14 Location Factor 3 to second priority land parcels considered for inclusion in the UGB.

Under a Goal 14 Factor 3 analysis regarding public facilities and services, a local government may consider relative difficulty and cost differences between urbanizing alternative sites and may consider whether the amount of potentially suitable land within a geographic area could reasonably justify the extension of public infrastructure.

McKenzie View, Oxbow/Camp Creek, Mohawk, West Jasper/Mahogany, East Springfield, Wallace Creek, Jasper Bridge, Clearwater, and Seavey Loop were excluded from further consideration for inclusion in the UGB based on physical constraints that preclude serviceability. It is important to note that although the City did not exclude these lands on the basis of comparative environmental, social, energy, and economic (ESEE) consequences, all of these excluded lands would be excluded under Goal 14 Location Factor 3: Comparative environmental, social, energy, and economic (ESEE) consequences solely on the basis of cost, at the point in the analysis when cost to provide public infrastructure and urban services is considered. The City's reasoning is based on a high level planning estimates of cost per linear mile[85], factors easily multiplied by the numbers of miles indicated in Table 5 needed to reach *potentially* suitable parcels of adequate size and slope, to calculate cost estimates for the comparative purposes of this analysis. For example, the City estimated extension of wastewater main to serve the Seavey Loop areas outlined in the Map "Springfield 2030 Plan: Potential UGB Expansion Engineering

[85] For example, Springfield City Council Agenda Item Summary, April 28, 2014, ATT2 provided the Council with approximate unit costs of wastewater and transportation improvements to supplement the City Engineer's memorandum. "These analyses were not budget-level cost estimations but rather estimates whose principal value is to permit comparison of relative levels of cost."

Feasibility Analysis, April 2014"[86] to cost 13 million dollars based on a unit cost of $428/liner foot to extend the pressure main and a unity cost of 3.5 million to upgrade an MWMC pump station. These costs are for the offsite portion of the infrastructure extension to reach the outside boundary of the area shown in the referenced map and do not include the cost to the development site from that boundary.

Goal 14 Location Factor 3 and 4 Evaluation of *Potentially* Suitable Exception Land

The City relied on the same findings in Table 2 Second Priority Exception and Non-Resource Parcels and Constraints Analysis and Table 5 Public Facilities and Service Analysis — as explained and supported in greater detail in referenced facility plans, maps and supplemental evidence in the record — as the basis for comparing relative costs associated with constructing public facilities and providing public services to lands in the vicinity of the Springfield UGB, and thus to compare *economic* consequences (ESEE) of alternative expansion areas under Goal 14 Location Factor 3 in the next step in the UGB Alternatives Analysis. At this point in the analysis, the City excluded lands based on cost of needed infrastructure relative to the amount of suitable exception land to be served.

The City relied on the same findings in Table 2 Second Priority Exception and Non-Resource Parcels and Constraints Analysis and Table 5 Public Facilities and Service Analysis and associated text in this report — as explained and supported in greater detail in referenced facility plans, maps and supplemental evidence in the record — to compare the relative social, environmental and energy (ESEE) consequences associated with constructing public facilities, providing public services and urbanizing land to support industrial and commercial mixed-use development in alternative locations, and thus to compare the ESEE consequences of alternative expansion areas under Goal 14 Location Factor 3 in later steps in in the UGB Alternatives Analysis.

Only one exception area was found to be *potentially* suitable and serviceable — **Far East A**, thus no further comparison with other second priority land under Goal 14 Location Factor 3 or Factor 4 was required.

Goal 14 Factor 3: Comparative environmental, social, energy, and economic (ESEE) consequences

The City evaluated the **Far East A** exception land parcel(s) further under a Goal 14 Location Factor 3 analysis: the comparative environmental, social, energy, and economic (ESEE) consequences.

Economic Consequences

The City's Economic Opportunities Analysis Final report explains the importance of and the City of Springfield's need to maintaining an inventory of suitable sites for industrial and commercial development to support a strong diverse economy and to provide for the city's employment needs as required under Goal 9. To provide an adequate amount and suitable type of land for target industrial

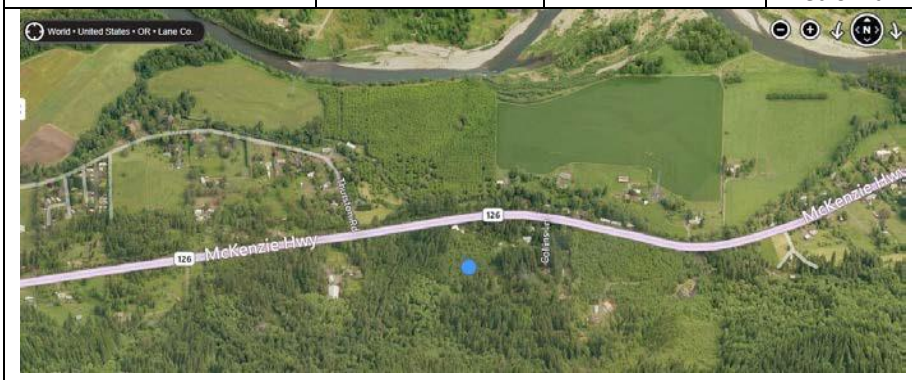
[86] Ibid.

and commercial mixed use employers, the City needs to add suitable sites 5 acres and larger that are sloped less than 7% maximum for office uses and 5% or less for manufacturing uses. Economically feasible serviceability is an important factor in the City's determination of whether it is reasonable to assume that a particular site is suitable for industrial or commercial use to meet the city's identified site needs for employment land suitability as defined in OAR 660-009-0005(9).

The City reasoned that the following facts regarding **Far East A** exception land parcel(s) are relevant when considering the **economic** consequences of urbanization to establish a land supply for industrial and office commercial employment land uses in this location:

- The suitable acreage in Parcel 1 (6.4 acres) and Parcel 2 (6.9 acres) is marginal to meet Springfield's identified land needs. CIBL/EOA Table 5-2 states that the average size of needed sites in the 5-20 acre category is 10 acres for an industrial site and 9.3 acres for a commercial and mixed use site.[87] Thus these two sites are too small to be suitable for industrial uses and are both smaller than the 9.3-acre average size of needed sites in the 5-20 acre category.
- 1701312001500; 6.9 acre slopes <15%, developed residential use, *entire property is sloped >12%
- The topography of the **Far East A** Parcel 2 site is limited to meet Springfield's identified industrial and commercial site needs. Springfield's target manufacturing industries require sites sloped 5% or less. Springfield's target commercial and mixed use employers require sites sloped 7% or less. The City determined through GIS analysis[88], the portions of parcels 1 and 2 that is sloped 7% or less and 5% or less. Both parcels are developed with rural homes and structures.

Parcel #	Contiguous acres 7% or less slope	Contiguous acres 5% or less slope	Notes
Parcel 1: 1702362401500	7.2 ac.	5.9 ac.	developed residential use occupies highway side of parcel
Parcel 2: 1701312001500	5.5 ac.[89]	2.8 ac	Robinson parcel, recently removed from Metro Plan

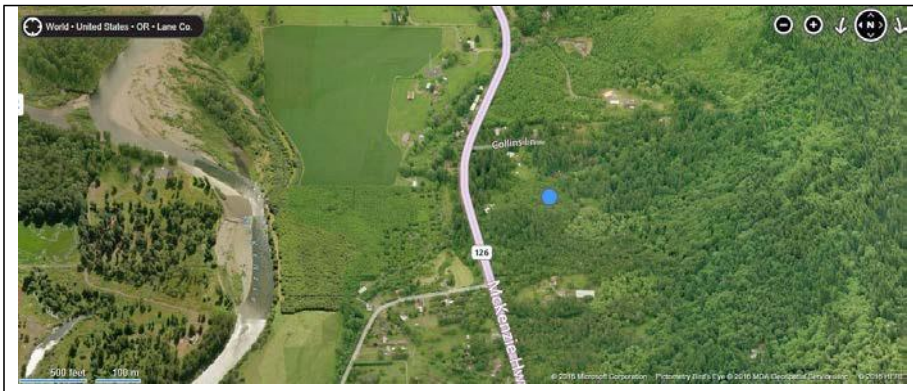


Parcel 2 context

[87] CIBL/EOA, p. 78.

[88] based on 2m resolution elevation data obtained from LCOG, email from staff Engelmann to staff Pauly, March 10,2016

[89] According to RLID, the mapped NRCS soil series for this parcel is "43E Dixonville-Philomath-Hazelair complex, 12 to 35% slopes, 100%". The City's GIS slopes analysis shows 6.9 acre sloped <15%



Parcel 2 context

- As shown in Table 2, the area has only 2 parcels 5 acres or larger, a total of 13.3 acres and suitable acreage includes sloped land in excess of 5 and 7%.
- Suitable acreage in Parcel 1 and Parcel 2 is insufficient to justify the offsite cost to extend water and wastewater to Parcel 2.
- The suitable parcels are not contiguous to one another, thus cost share between property owners is unlikely.
- Offsite cost comes at relatively higher public cost than onsite connections to water, wastewater, stormwater and transportation systems.
- It is not reasonable to assume that the amount of potentially suitable land within Far East A would justify the cost to extend public infrastructure to the site.

Far East A parcels were considered physically serviceable. The relative distance to existing water, wastewater and transportation facilities suggests that water and wastewater facilities could be extended or upgraded to have adequate capacity within the 20-year planning period. However, there are only two sites 5 acres or larger (and the site abutting the UGB is sloped 12% or more), thus it would not be practical or feasible to extend infrastructure to serve one or two 5 acre sites.

The **Far East A** exception land parcel(s) cannot reasonably accommodate the needed urban industrial and commercial employment land uses based on **economic** consequences, because urbanization will not be economically feasible.

Environmental and Energy Consequences

The City finds that the following facts about **Far East A** exception land parcel(s) are relevant when considering the **environmental and energy** consequences of urbanization in this location:

- A shown in TSP Figure 12, no existing or planned pedestrian facilities serve east Main Street/Highway 126 east of 70th Street. No existing or planned pedestrian facilities serve Thurston Road east of 69th Street.
- As shown in TSP Figure 10 Main Street/Highway 126 and Thurston Road to the UGB extent are within the Recommended Roadway Network.
- As shown in TSP Figure 3, Main Street/Highway 126 is a Federal Truck Route.

- As shown in TSP Figure 9, planned frequent transit service network routes, the nearest connect is at Main Street/Highway 126 and Straub Parkway.

Geologic Hazards

The City referenced data in Oregon HazVu, DOGAMI's online interactive geohazard map to identify hazard area areas. State of Oregon Department of Geology and Mineral Industries http://oregongeology.org/pubs/

Given that several of the UGB Preliminary Study Area groupings examined by the City are within, surrounded by or are accessible only by lands with steeply sloped topography, the City referenced data in the Oregon Department of Geology and Mineral Industries (DOGAMI) online interactive geohazard map to identify areas where landslide hazards have been documented. The DOGAMI website states that "the map offers a general look at regions that may be at risk for landslides, and will be used to help prioritize areas for future in-depth landslide mapping and study;" and "The Statewide Landslide Information Database of Oregon (SLIDO) project was created to improve our understanding of the landslide hazard in Oregon and to provide a statewide base level of landslide data. The original studies vary widely in scale, scope, and focus, which is reflected in a wide range in the accuracy, detail, and completeness with which landslides are mapped." The map indicates areas of low, moderate, high and very high landslide susceptibility for counties, incorporated cities, and some watersheds. The DOGAMI website states: "Landslide susceptibility is the likelihood that a location will have landslides in the future." DOGAMI maps are for informational purposes and are not regulatory.

The DOGAMI website states:

> *"One of the most common and devastating geologic hazards in Oregon is landslides. Average annual repair costs for landslides in Oregon exceed $10 million, and severe winter storm losses can exceed $100 million (Wang, Y., Summers, R. D., and Hofmeister, R. J., 2002, Landslide loss estimation pilot project in Oregon: Oregon Department of Geology and Mineral Industries Open-File Report O-02-05, 23 p.). As population growth continues to expand and development into landslide susceptible terrain occurs, greater losses are likely to result. In order to begin reducing losses from landslides, widespread endeavors are necessary at all community levels from state government to individual family homes. One successful way to reduce losses from landslides is through pre-disaster mitigation, which can be performed at many scales from statewide to local. To begin pre-disaster mitigation, the landslide hazard must be located. Once the hazard is located, the population and infrastructure vulnerable to the hazard can be identified and the risk mitigated."* (emphasis added)

The DOGAMI website states:

> *"The primary purpose of SLIDO is to provide the best currently available mapping of landslide features throughout Oregon. The database should serve as useful tool for differentiating broad areas of higher and lower hazards and as a starting point for more*

detailed study. This spatial information is basic to emergency management and land-use applications, including:

- *<u>Identify vulnerable areas that may require planning considerations</u>*
- *Estimate potential losses from specific hazard events (before or after a disaster hits)*
- *Decide how to allocate resources for most effective and efficient response and recovery*
- *Prioritize mitigation measures that need to be implemented to reduce future losses"* (emphasis added)

The City considered the DOGAMI SLIDO data for the purposes of informing the next steps in the analysis: 1) determination of suitability of land for urban growth including but not limited to physical factors involved when developing sites 5 acres and larger to accommodate specific types of industrial and commercial employment land uses to meet Springfield's employment land needs; and 2) examination and comparison of the ESEE consequences of urbanizing lands within the second priority category.

The City appropriately considered the general DOGAMI SLIDO data in relationship to the UGB Preliminary Study Area to discern and differentiate broad areas of higher and lower landslide hazards to identify potentially vulnerable areas within the Preliminary Study Area that may require land use planning considerations.

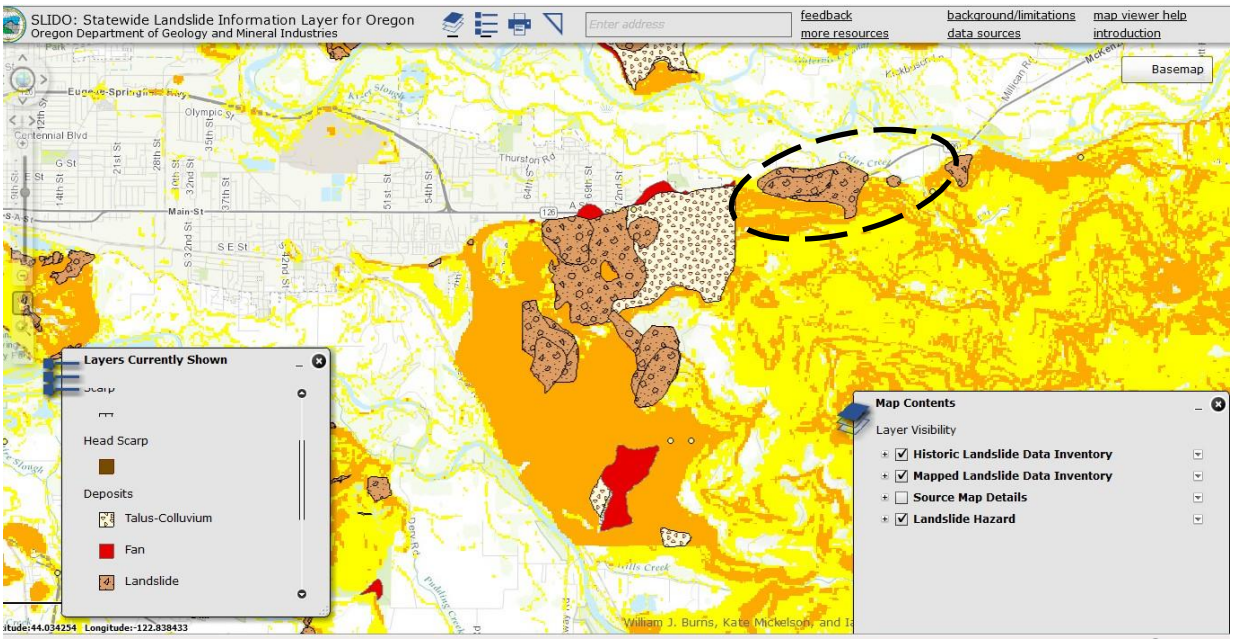
The City appropriately used the general DOGAMI SLIDO data when it identified the UGB Preliminary Study Area groupings in the vicinity of documented landslide hazards to determine where there exists an increased likelihood that a location will have landslides in the future and where relatively greater losses are likely to result. Comparatively, the City considered areas without known landslide hazards to be more suitable for urbanization than areas with documented landslide hazards.

Oregon Statewide Planning Goal 7 directs local governments to "adopt comprehensive plans (inventories, policies and implementing measures) to reduce risk to people and property from natural hazards" including landslides. Springfield has acknowledged comprehensive plan policies and implementing measures to reduce risk to people and property from landslide hazards, including Springfield Development Code Section 3.3-500 Hillside Development Overlay District standards. These policies and standards were developed to address development of lands already inside the UGB that are planned to accommodate urban levels of development. New hazard information published by the State, such as the DOGAMI SLIDO data is useful to local governments as they plan expansions of their UGBs to accommodate forecast urban growth.

The City's review of The DOGAMI SLIDO map data identified the presence of documented landslide hazards and relatively higher landslide susceptibility including Very High, High, and Moderate in the vicinity of UGB Preliminary Study Area groupings: McKenzie View A, B, Mohawk A, B and C, Oxbow/ Camp Creek, **Far East**, South Hills, Wallace Creek and Seavey Loop B and C and Seavey Loop/Goshen. There exists an increased likelihood that mapped hazard locations will have landslides in the future compared to areas without mapped hazards.

DOGAMI SLIDO maps[90] of the South Hills area indicate the presence of landslide hazards in the in the immediate vicinity of the **Far East Springfield** Preliminary Study Area grouping.

Star indicates 5-acre residential parcels



Detail: DOGAMI SLIDO **Far East** landslide hazard area

The presence of landslide hazards influence future urbanization patterns by potentially increasing risk to public health, safety and welfare both onsite and offsite of the parcels of land being developed and/or by imposing constraints that could preclude development or contribute to the infeasibility of developing a particular site to accommodate the types of particular industrial and other employment uses identified in the CIBL/EOA. Although the City did not identify the presence of landslide hazards as an absolute development constraint for the purposes of the Commercial and Industrial Lands Inventory, the City considered areas with known landslide hazards as comparatively less "suitable" to meet the need for large site industrial and commercial mixed use employment site needs when it determined suitability of land for urban growth including but not limited to physically developing sites 5 acres and larger to accommodate specific types of industrial and commercial employment land uses to meet Springfield's employment land needs; and when it examined and compared the ESEE consequences of urbanizing lands with or without known landslide hazards within the second priority category.

[90] Ibid.

The intensification of development associated with urbanization would require site grading and excavation to construct large site urban employment uses and to extend the infrastructure needed to serve development. Such grading and excavation may not be physically or economically feasible or advisable in areas of known instability, and such site development may not be achievable under the standards of the City's Development Code Hillside Development District.[91]

For purposes of the ESEE social and economic comparison, the City finds that when urbanization and development occurs in hillside areas with terrain known to be landslide-susceptible, greater losses are likely to result than when urbanization and development occurs in areas with terrain not known to be landslide-susceptible.

According to DOGAMI[92] staff, when grading and excavation remove land from the basal area of a slide or when drainage is altered in a way that directs water to a slide, those actions serve to destabilize the slide. The DOGAMI map clearly indicates that McKenzie Highway 126 traverses the basal area of a slide area.

For purposes of the ESEE economic consequences comparison, the City finds that urbanization and development occurring in hillside areas with terrain known to be landslide-susceptible will be more costly to build and maintain than urbanization and development outside of areas with terrain not known to be landslide-susceptible, because such development must meet more rigorous engineering, architectural and construction requirements. The public cost of constructing infrastructure, providing services and maintaining infrastructure in sloped terrain is comparatively higher than developing public facilities on flatter areas.

For purposes of the ESEE environmental and social consequences comparison, the City finds that urbanization and development occurring in hillside areas with terrain known to be landslide-susceptible will result in higher risk to public health and safety than developing public facilities on with terrain not known to be landslide-susceptible.

The City finds that the **Far East A** exception land parcel(s) cannot reasonably accommodate the needed urban industrial and commercial employment land uses based on comparative **environmental** and **energy** consequences.

Social Consequences

[91] Springfield Development Code Section 3.3-500 Hillside Development Overlay District is applied in residential zoning districts above 670 feet elevation or to development areas below 670 feet in elevation where any portion of the development area exceeds 15 percent slope. Development standards address special street grade and grading plan standards, and geotechnical report requirements to address geological conditions of the site.

[92] Radio interview with DOGAMI Chief Scientist Ian Madin, on Jefferson Exchange program, 1280AM, March 10, 2016 explaining the SLIDO map data project.

The City finds that the following facts about **Far East A** exception land parcel(s) are relevant when considering the **social** consequences of urbanization in this location:

OAR 660-009-0005 (3) states:

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

The **Far East A** exception land parcel(s) cannot reasonably accommodate the needed urban industrial employment land uses because of the following **social** consequences:

- The Goal 9 rule's definition of "industrial" clearly recognizes that "Industrial uses may have external impacts on surrounding uses;" and that industrial uses typically and traditionally may locate in locations where other industrial activities are occurring.
- Industrial uses may have external impacts on surrounding uses and may cluster in traditional or new industrial areas where they are segregated from other non-industrial activities.[OAR 660-009-0005(3)]
- The **Far East A** exception area is already committed to rural residential uses on small parcels.
- Based on the UGB Alternatives Analysis, input from the CIBL Technical Advisory Committee and the public, the **Far East A** area is better suited to residential uses than industrial or office commercial employment uses.
- The cost of extending offsite infrastructure to serve industrial and commercial mixed use development sites will create a public cost, as the city has limited legal authority to exact off-site improvements. Exactions must be proportional to the impacts of the development.

ORS 197.298(1)(b) Goal 14 Location Factor 3 Conclusion – Second Priority Lands Analysis

The City excluded Far East A lands based upon analysis of comparative ESEE consequences (Goal 14, Boundary Location, Factor 3). The City determined that the cost to serve 2 parcels 5 acres or larger — a total of 13.3 acres — is not economically feasible. These parcels are not contiguous to one another. McKenzie View A Preliminary Study Area grouping cannot reasonably be served with adequate public facilities by 2030 and thus are not suitable to meet the identified employment land need. The City finds that the long-term environmental, economic, social and energy consequences resulting from the use at the exception site with measures designed to reduce adverse impacts are significantly more adverse than would typically result from the same proposal being located in other areas.

Goal 14 Factor 4: Compatibility of proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB

The City finds that the following facts about **Far East A** exception land parcel(s) are relevant when considering the consequences of urbanization in this location:

- Excellent Class I and II agricultural soils exist on and immediately abutting and between the potentially suitable exception parcels. The land along the McKenzie River is prime class I and II farm land.

<u>ORS 197.298 (1)(b) Goal 14 Location Factor 4 Conclusion – Second Priority Lands Analysis:</u> Goal 14 Location Factor 4 implicitly requires that the City's determination to exclude the exception area sites it considered and rejected must also be justified based on consideration of Goal 14 Location Factor 4: Compatibility with nearby ag and forest land. The City's findings provide evidence to explain why this is the case.

As previously stated, the lands adjacent to the UGB that are identified in the Lane Rural Comprehensive Plan as exception or nonresource land are identified by orange color in Map 1 Priority Areas and Constraints Analysis. As shown in that map, Springfield is unlike many Oregon cities in that there are few exceptions areas in the immediate vicinity of the UGB. Most exception parcels closest to the City are small developed rural residential parcels on land divisions approved by Lane County prior to adoption of SB100 and thus not suitable for meeting Springfield's large site employment land urbanization needs. Many of the exceptions parcels are remote and physically isolated from the City due to natural barriers formed by the McKenzie and Middle Fork Willamette rivers, steep topography of the Coburg Hills and Thurston South Hills, and other natural constraints. As shown in Map 1, and as explained in the following section of this report, most of the exceptions parcels areas in the vicinity of the UGB are located on the opposite side of the McKenzie and Middle Fork Willamette rivers, and many are constrained by slopes >15%.

The City's description of exception land Table 2 provides evidence to demonstrate that expanding the UGB onto exception lands in all instances would actually promote urban sprawl by "opening up" new corridors of urbanization into, through, and adjacent to extensive large blocks of resource land areas north of the McKenzie River, up the McKenzie River, and south of the Springfield UGB. In all but two instances (Far East Springfield which has one exception parcel 5 acres or larger abutting the UGB, and Clearwater, which has no parcel 5 acres or larger), exception areas are located remote to the UGB and would require leapfrogging across land unsuitable for urbanization to extend infrastructure and services to remote parcels of land.

The analysis of efficient accommodation of identified land needs under Goal 14, factor 1, allows a local government to consider the ability of a site to accommodate a compact urban form. The term "maximum efficiency of land uses" invokes a concern for avoiding leapfrog or sprawling development inconsistent with the density and connectivity associated with urban development. In addition to being highly inefficient, impractical and financially infeasible, it would have consequences that could pose impacts to nearby ag and forest land and uses thereon, including but not limited to increased traffic conflicts with farm or forestry vehicles.

Also it should be noted that some exception parcels, while developed, committed and zoned for rural uses, comprise Class 1 and 2 agricultural soils that, if included in the UGB, would become urbanizable. Throughout the analysis, staff noted the presence of agricultural uses in many of these areas that currently provide opportunities for small "micro" farms close to the urban area that contribute to the local food system economy.

ORS 197.298 (1)(b) Conclusions – Second Priority Lands Analysis

ORS 197.298 requires that urbanization be directed to the second priority exception or non-resource lands to accommodate the land need if the second priority lands can "reasonably accommodate" the identified land need. As explained in this report, and supported by the substantive and evidence in the record, the City conducted a complete and thorough alternatives analysis of second priority lands adjacent to the UGB that was not limited to those lots or parcels that abut the UGB, but also included all exception land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency. [OAR 660-024-0060(4)].

The City determined that second priority lands adjacent to or in the vicinity of the UGB cannot reasonably accommodate the identified employment land need. The City's decision was reached after identifying and evaluating all exception and non-resource land in the vicinity of the UGB, after identifying and evaluating potentially suitable exception parcels 5 acres or larger (including contiguous parcels <5 acres under same ownership) without absolute development constraints; after consultation with experts to identify needed site characteristics for the target industrial and commercial/mixed use industries identified in the CIBL/EOA that require sites 5 acres and larger and 20 acres and larger, including public facilities needs for industrial and commercial land development; after consultation with public facility and services providers including ODOT; after evaluation of exception land location and topography as it relates to the ability to extend public facilities of sufficient physical capacity and structure to support provision of urban services including water and wastewater mains and public transit service to UGB expansion areas; in consideration of applicable policies in the *Springfield Development Code* Chapter 5.7-100 for annexing territory; after consideration of infrastructure and transportation needs to serve lands already in the UGB as identified in the applicable *Eugene-Springfield Metropolitan Area Public Facilities and Services Plan,* applicable transportation system plans, facilities master plans and capital improvement programs; and after consideration of the City's development

standards and requirements for urban development in the *Springfield Development Code* Chapters 3.2-300, 3.2-400, 3.2-600, 3.3-300, 3.3-300, 3.3-400, 3.3-500, 3.3-1000, Chapter 4 in its entirety and the *Springfield Engineering Design Standards and Procedures Manual*.

After a thorough parcel-by-parcel evaluation, the City determined that urbanization cannot be directed to the exception and non-resource lands adjacent to the UGB because exception and non-resource lands cannot "reasonably accommodate" the identified specific industrial and commercial-mixed use land need for sites 5 acres and larger. Therefore, second priority exception and non-resource lands are inadequate to accommodate the amount of land needed because specific types of identified land needs cannot be reasonably accommodated on exception and non-resource lands, and future urban services could not reasonably be provided to the exception and non-resource lands due to topographical or other physical constraints.

The City's conclusion that exception and non-resource lands adjacent to the UGB these lands could not reasonably be provided with urban services within the 2010-2030 planning period based on topographical or other physical constraints was reached based on sound reasoning of ample data and is supported by substantial evidence in the record.

After conducting a thorough parcel-by-parcel evaluation of *potentially* suitable parcels that could reasonably accommodate the identified specific industrial and commercial-mixed use land need for sites 5 acres and larger and that are potentially serviceable due to proximity and lack of topographic or other physical constraints (**Far East A**), the City determined that the comparative environmental, economic, social and energy consequences of directing urbanization to the Far East A area compare unfavorably to directing urbanization to other lands because land is not suitable to meet the site needs of target industries and the amount of unconstrained land is economically infeasible to serve with public water and wastewater facilities on a cost basis. The City concluded that urbanization of Far East A is not economically viable on a service cost basis.

After conducting a thorough parcel-by-parcel evaluation of the location of the **Far East A** in relationship to land designated for agriculture and forestry in the Lane Rural Comprehensive Plan; and after consideration of comparative environmental, energy, economic and social consequences of urbanizing those lands for the purpose of developing industrial and office commercial urban uses [Goal 14 Boundary Location Factor 3]; and after consideration of compatibility of the proposed industrial and office commercial urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB [Goal 14 Boundary Location Factor 4] the City concluded that urbanization of Far East A and other exception land is not economically viable on a service cost basis and is more likely to negatively affect nearby agricultural and forest activities occurring on farm and forest land outside the UGB by extending or expanding new corridors of urban development into areas primarily designated for agricultural and forest use. [Goal 14 Boundary Location Factor 4] conclusions here.

Thus, urbanization of exception land compares unfavorably with other lands the City considered for inclusion in the UGB.

The City's evaluation properly considered second priority exception and non-resource lands as alternative boundary locations consistent with ORS 197.298 and Goal 14 Boundary Location Factors 3 and 4.

The City's conclusion that directing urbanization to the Far East A exception area would not "reasonably accommodate" the identified specific industrial and commercial-mixed use land need for sites 5 acres and larger was reached based on sound reasoning of ample data and is supported by substantial evidence in the record.

The City's conclusion that directing urbanization to the Far East A exception area to accommodate the identified specific industrial and commercial-mixed use land need for sites 5 acres and larger compares unfavorably to directing urbanization to other lands was reached based on sound reasoning of ample data and is supported by substantial evidence in the record.

Therefore, second priority exception and non-resource area lands are inadequate to accommodate the amount of land needed.

The City's conclusion that second priority exception and non-resource lands are inadequate to accommodate the amount of employment land needed because specific types of identified land needs was reached based on sound reasoning of ample data and is supported by substantial evidence in the record.

The preceding analysis provide substantive evidence to explain why the city concluded that most of the 72 isolated, remote and scattered second priority exception land parcels 5 acres or larger are not serviceable and suitable to meet Springfield's employment land needs and why the few, scattered parcels that may be serviceable are of insufficient size, quantity and location to be provided with economically feasible and cost efficient infrastructure and services.

To accommodate the identified land need, the City identified and evaluated the next priority of land under ORS 197.298.

ORS 197.298 (1)(c):

> *"If land under paragraphs (a) and (b) of this subsection is inadequate to accommodate the amount of land needed, third priority is land designated as marginal land pursuant to ORS 197.247 (1991 Edition)."*

OAR 660-024-0060(1)

> *"(c) If the amount of suitable land in the first priority category is not adequate to satisfy the identified need deficiency, a local government must determine which land <u>in the next priority</u> is suitable to accommodate the remaining need, and proceed using the same method specified in subsections (a) and (b) of this section until the land need is accommodated."*

IDENTIFY THIRD PRIORITY MARGINAL LAND

Next, the City's analysis identified third priority marginal lands adjacent to the UGB. As shown in Table 7, marginal lands exist in three areas adjacent to Springfield's UGB: Oxbow/Camp Creek, Mohawk and Wallace Creek.

Table 7 Preliminary Study Areas Containing Third Priority Marginal Lands:

North Gateway	McKenzie View	**Oxbow/Camp Creek**
Hayden Bridge	**Mohawk**	North Springfield Highway
East Springfield	South Hills	West Jasper/Mahogany
Wallace Creek	Jasper Bridge	Mill Race
Seavey Loop	Thurston	Clearwater

This section of the report provides explanation and evidence to support the City's findings addressing ORS 197.298(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060 (1)(c), OAR 660-024-0060(1)(d),OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c).

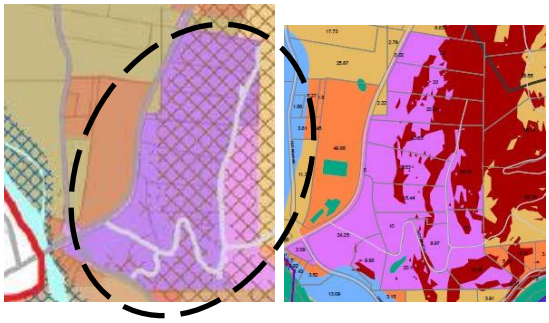
Table 8: General Description of Third Priority Marginal Lands Parcels and Constraints provides a general descriptive summary of the Third Priority marginal lands in the vicinity of the UGB. Where shown, the red line in the small maps below is the UGB. Underlined parcel numbers indicate parcels with 5 or more unconstrained acres.

Table 8: Third Priority Marginal Lands Parcels and Constraints

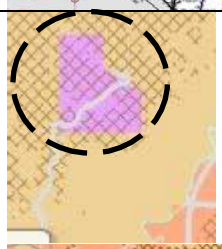
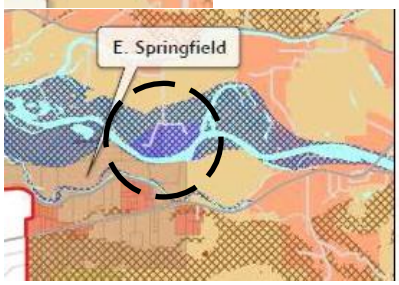
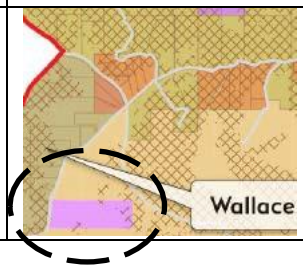
Mohawk Marginal[93]

- Skyline Ranch plat, 20-acre rural residential lots
- Slopes > 25%, slopes 15-25% cover most of area
- Some parcels with flatter topography are located in the SW portion of this area:
  - 17-02-20-00 428: 5.8 acres <15% slopes, developed w/New Song Church, hydric soils

  - 17-02-20-00 0431: 8 acres <5% slope. 13.8 acres,

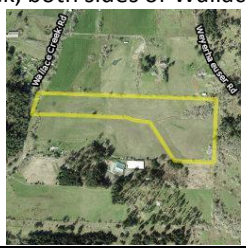
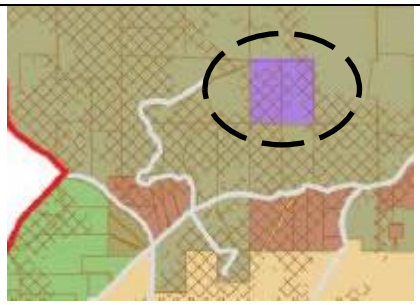


[93] See maps in record "Employment Opportunity Area 2 Hayden Bridge Area – Potential Study Area Evaluation", ECONorthwest, November 2008 showing marginal land area parcel sizes and slope constraints; and copy of A & T map 17-02-20-00 with marginal parcels highlighted and slope calculations for parcels.

80 % of 13.8 ac. site is NRCS Cl 8 (110—Pits)[94], 12% of site has 3-12% slopes, 8% has slopes<3%, vacant. Parcel 1 of Subdivision 2015-P2658. ○ <u>17-02-20-00 0432: 9.3 acres</u> slopes < 15% (3 acres <5%, 6.3 5-15%), hydric soils, vacant ○ 17-02-20-00 0413: developed rural residential use on High Ranch Drive, small flatter topo area (<5 acres) along Marcola road edge of parcel ○ 17-02-20-00 0412: 20.6 acres developed rural residential use on High Ranch Drive, small flatter topo area (~2 acres) along Marcola road edge of parcel, 56% of parcel has slopes > 12%, slopes up to 75%, hydric soils • Other parcels in this area have slopes > 15% and are developed with rural residential uses. • <u>(3) parcels 5.8-9.3 unconstrained acres in this area</u>	
Oxbow/Camp Creek Marginal[95] • Three contiguous 15-acre parcels: 17022400 TL 406 (73% 12-45% slopes), TL 407 (94% 12-45% slopes), TL 408 (84% 12-45% slopes) • Slopes 12-45% • Remote from UGB • Developed with rural residential uses. • Marginal parcels on the McKenzie River 17-01-30-00 2300, 2301, 2302, 2303 are entirely in the floodway	 
Wallace Creek Marginal A ○ Within 1 mile of UGB via Jasper Rd. and Wallace Creek Rd. ○ (2)20-acre parcels (separate ownership) Some slopes 2-12%, some >15% <u>18-02-14-00 1002 17.9 unconstrained acres</u> <u>18-02-14-00 1003 17.7 unconstrained acres</u>	

[94] Soil and slope percentages determined from NRCS data in the Lane County Regional Land Information Database. NRCS Soil Survey of Lane County, p. 123 defines soil map unit 110—Pits "as open excavations from which soil and commonly some of the underlying material have been removed." …Some pits "are being filled or will be filled with industrial waste or material from roadside cutbank slopes or ditch cleaning."

[95] See maps in record A & T map 17-02-21-24 with marginal land parcels highlighted. Slope percentages determined from NRCS data in the Lane County Regional Land Information Database

(Wallace Creek[96] 50' setback assumed) ○ Wetlands and hydric soils are present along Wallace Creek, both sides of Wallace Creek Rd. 	
Wallace Creek Marginal B • Predominantly slopes >15% • 2 parcels, total of 40.3 acres, separate ownership, homes on each parcel • 18-02-12-00 TL 302 3.8 acres unconstrained • 18-02-12-00 TL 303 6.4 acres unconstrained (unconstrained portion is developed with rural residence) 	

IDENTIFY THIRD PRIORITY MARGINAL LAND WITH THE SPECIFIED CHARACTERISTICS TO MEET THE IDENTIFIED EMPLOYMENT LAND NEED TO INCLUDE IN THE UGB

Suitability Findings: Marginal Land

To identify potentially suitable marginal land sites to meet employment land needs, the City applied the following factors[97] (from an outline provided by DLCD Staff Gordon Howard) to exclude or include marginal lands in the next stage of the evaluation process:

[96] *Water Quality Results for the Middle and Coast Fork Willamette Watersheds and Eight Small Cities in the Upper Willamette Sub-basin: 2008- 2010, July 2011,* *http://www.longtom.org/wp-content/uploads/2012/05/Upper-Willamette-WQ-Monitoring-Final-Report_2010.pdf* report states: "Wallace Creek, a small tributary that enters the Middle Fork Willamette River downstream of Dexter Dam and which dries up in the summer, always met the State Standard for temperature but did not for dissolved oxygen and E. coli."

- Exclude lands that are not buildable[98]
- Exclude lands based upon specific land needs (197.298(3)(a))

The next step in the City's process identified which marginal land parcels could potentially be suitable to meet the City's need for employment land, including sites larger than 20 acres. This step excluded parcels or portions of parcels with absolute development constraints that make lands not buildable, and excluded marginal land with pre-existing development and parcelization patterns that limit the suitability of lands for use as future employment sites.

For the purpose of evaluating third priority marginal land, the City identified the following criteria to apply equally to all parcels within the Preliminary Study Area — in order of the land's priority under ORS 197.298— to determine whether a parcel of land or group of parcels is potentially suitable to meet employment land needs.

Site size is a key factor because Springfield's land need in the UGB expansion is for sites larger than 5 acres, with some needed sites larger than 20 acres.

The City identified parcels 5 acres or larger as potentially suitable to meet employment land needs, and excluded parcels or portions of parcels <5 acres from further analysis.

Topography is a key factor in determining suitability because Springfield's land need is for industrial and commercial employment sites with relatively flat topography <5% and <7%.

Consistent with the absolute constraints applied in the Commercial and Industrial Buildable Lands Inventory and Economic Opportunities Analysis (CIBL/EOA), the City identified the following factors as "absolute constraints" to development of employment uses and to providing urban services to employment land:

- Portions of tax lots with slopes>15%
- Portions of tax lots comprising waterways and inventoried wetlands
- Portions of tax lots within the floodway
- Portions of tax lots within riparian resource areas

The City excluded portions of parcels constrained by floodway, inventoried wetlands, waterways, and riparian resources when it analyzed the suitable acreage of a parcel or group of parcels. As these factors preclude or place limitations on whether a parcel is buildable for urban development, they subsequently preclude or place limitations on the suitability of land to accommodate the need deficiency determined under OAR 660-024-0050.

The City identified parcels or portions of parcels with slopes <15% as potentially suitable to meet employment land needs, and excluded parcels or portions of parcels with slopes >15% from further analysis.

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[98] "Buildable" is a Goal 10 term. It is the City's position that OAR 660-024-0060 (1) requires the City to consider whether sites are "suitable" at this "buildable" stage in the evaluation process.

The City excluded portions of parcels constrained by floodway, inventoried wetlands, waterways, and riparian resources when it analyzed the suitable acreage of a parcel or group of parcels.

The City's findings describe or map all of the alternative areas evaluated in the boundary location alternatives analysis as required by OAR 660-024-0060(6). The City's analysis involves more than one parcel or area within a particular priority category in ORS 197.298 for which circumstances are the same, so as permitted under OAR 660-024-0060(6), the City is allowed to consider and evaluate these parcels or areas as a single group. The City analyzed parcels within a priority category by geographic groupings as permitted under OAR 660-024-0060(6).

In addition to the summary data compiled in Table 8, the record includes maps, acreage calculations and other evidence demonstrating that the City uniformly evaluated parcelization, slopes, floodway, inventoried wetlands, waterways, and riparian resources on all marginal land parcels in the preliminary study area when it identified potentially suitable ORS 197.298 third priority marginal land parcels.

In addition to the summary data compiled in Table 8, the record includes maps, acreage calculations and other evidence demonstrating that the City uniformly evaluated parcelization, slopes, floodway, inventoried wetlands, waterways, and riparian resources on all marginal land parcels in the preliminary study area as the factual basis to justify excluding ORS 197.298 third priority marginal land parcels from further analysis.

None of the marginal land areas contains a potentially redevelopable parcel larger than 20 acres without absolute development constraints.

As shown in Table 9, two marginal land groupings contain vacant or potentially redevelopable parcels 5-20 acres without absolute development constraints:

Table 9: Potentially Suitable Third Priority Marginal Land

Area	Vacant or potentially redevelopable parcels larger than 20 acres without absolute development constraints?	Vacant or potentially redevelopable 5-20 acre parcels without absolute development constraints?
Mohawk	No	Yes
Oxbow/Camp Creek	No	No
Wallace Creek A	No	Yes
Wallace Creek B	No	No

As described and shown in the preceding text and graphics, and as verified by supporting evidence (parcel maps data and GIS maps) in the record, the City applied characteristics of parcel size, topography, and absolute development constraints (floodway, wetlands, riparian resources) to all third priority marginal land parcels in the Preliminary UGB Study Area to identify potentially suitable third priority land to meet the employment land need. **These steps excluded the Oxbow/Camp Creek and Wallace Creek B marginal land parcels from further analysis.**

To identify potentially suitable marginal land sites to meet employment land needs, the City applied the following factors[99] (from an outline provided by DLCD Staff Gordon Howard) to exclude or include marginal lands in the next stage of the evaluation process:

- Exclude lands that are not buildable[100]
- Exclude lands based upon specific land needs (197.298(3)(a))

Two marginal land areas — Mohawk and Wallace Creek A (indicated by a "yes" in Table 9) could potentially provide sites 5-20 acres in size without absolute development constraints to meet employment land needs.

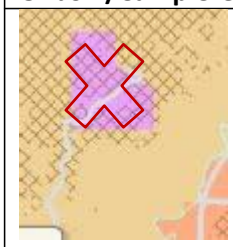
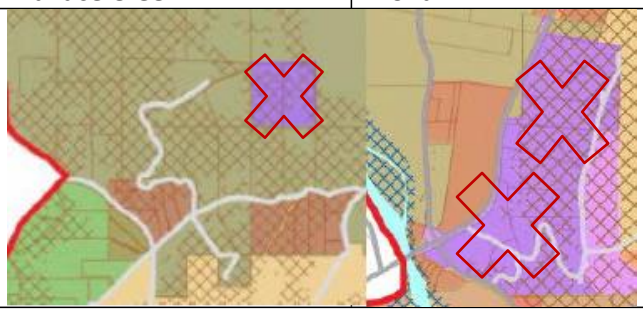
The City identified Mohawk and Wallace Creek A marginal land parcels as worthy of additional analysis to determine serviceability and suitability to meet the need for smaller 5-20 acre sites.

No marginal land area will provide a vacant or potentially redevelopable candidate site 20 acres and larger without absolute development constraints to meet employment land needs.

The City's need for sites 20 acres and larger cannot be met by adding marginal land lands to the UGB.

The Oxbow/Camp Creek and Wallace Creek B marginal land parcels were excluded from further analysis.

Table 10: Third Priority Marginal land parcels excluded:

Oxbow/Camp Creek	Wallace Creek B	Mohawk
		

In the next step, the City conducted a public facilities and services analysis to determine whether the *potentially* suitable land identified in the previous step could reasonably be provided with the public water, sewer, stormwater and transportation facilities needed to serve industrial and commercial mixed use employment uses within the 2010-2030 planning period and thus be considered suitable candidate lands to accommodate the identified employment land need deficiency determined under OAR 660-024-0050.

[100] "Buildable" is a Goal 10 term. It is the City's position that OAR 660-024-0060 (1) requires the City to consider whether sites are "suitable" at this "buildable" stage in the evaluation process.

As previously explained in this report for land to be "suitable" for industrial and other employment use under OAR 660-009-0005(12) it must be "serviceable." OAR 660-009-0005(9) states that "'Serviceable' means a city or county has determined that public facilities and transportation facilities, as defined by OAR chapter 660, division 11 and division 12, currently have adequate capacity for development planned in the service area where the site is located or can be upgraded to have adequate capacity within the 20-year planning period."

Public Services Analysis of Potentially Suitable Third Priority Land

OAR 660-024-0060(7) states:

> *"For purposes of Goal 14 Boundary Location Factor 2, "public facilities and services" means water, sanitary sewer, storm water management, and transportation facilities."*

Using GIS mapping and analysis tools and input received from the CIBL Technical Advisory Committee, City, County and State public agency staff including ODOT and Lane Transit District, other service providers and the public, the City conducted analysis to evaluate, compare and determine whether and how water, sanitary sewer, storm water management, and transportation facilities could be provided to potentially suitable third priority marginal land parcels within the Mohawk, Oxbow/Camp Creek, and Wallace Creek areas. The result of this step is a determination of whether parcels within each priority and within each geographic grouping can reasonably be served to support the employment land uses identified in the CIBL/EOA within the 2010-2030 planning horizon.

As previously explained in this report Goal 11 requires public facilities to be planned to support types and levels of urban facilities and services appropriate for Springfield's needs and requirements, consistent with the comprehensive plan. Springfield's need is for the types and levels of public facilities and services appropriate and necessary to support the needs of urban industrial and commercial uses generally and manufacturing and office employment sites specifically.[101] Goal 11 requires public facilities and services to be provided "*in a timely, orderly and efficient arrangement.*" Goal 14 requires cities to evaluate changes to their UGB considering "*orderly and economic provision of public facilities and services.*"

As previously explained in this report requirements under OAR chapter 660, division must be considered at this stage in the UGB Alternatives Analysis to ensure that the amendment of the comprehensive plan to add urbanizable lands to the UGB is supported by adequate planned transportation facilities in a manner that is consistent with applicable transportation planning requirements in OAR chapter 660, division 12. The City is expanding the UGB to designate suitable land for industrial and commercial development, therefore suitable candidate lands added to the UGB must provide for the relevant transportation needs: movement of goods and services to support industrial and commercial

[101] Springfield's Target Industries are listed and explained in detail in the CIBL/EOA.

development planned for pursuant to OAR chapter 660, division 9 and Goal 9 (Economic Development);[OAR 660-012-0030 (1)(c)] and movement of workforce employees to and from the workplace, including needs of the transportation disadvantaged.

Just as the TSP must "evaluate potential impacts of system alternatives that can reasonably be expected to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology;"[OAR 660-012-0035] the City's UGB study carefully examined and compared alternative candidate growth areas to determine which alternative(s) can reasonably be expected to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology."

The transportation system must "support urban development by providing types and levels of transportation facilities and services appropriate to serve the land uses identified in the acknowledged comprehensive plan." [OAR 660-012-0035(3)(a)]. The City is expanding the UGB to designate suitable land for industrial and commercial development, therefore suitable candidate lands added to the UGB must be located where the relevant transportation needs can be provided: movement of goods and services to support the industrial and commercial employment development planned for pursuant to OAR chapter 660, division 9 and Goal 9 (Economic Development), and movement of workforce employees to and from the workplace, including needs of the transportation disadvantaged. [OAR 660-012- 0030(1)(b)]

The City evaluated alternative candidate lands to consider the advantages and disadvantages of moving goods and service, workforce employees, including needs of the transportation disadvantaged via the existing and planned transportation system to minimize adverse economic, social, environmental and energy consequences. [OAR 660-012-0035(3)(c)]. The City accomplished this by measuring and comparing distance to candidate sites via existing and planned routes.

To address OAR 660-012-0005 (41) *"Vehicle Miles of Travel (VMT),* the City considered the VMT advantages and disadvantages of moving goods and service, workforce employees, including needs of the transportation disadvantaged via the existing and planned transportation system [OAR 660-012-0005(41)]when it evaluated alternative candidate lands. The City accomplished this by measuring and compared distance to candidate sites via existing and planned routes, assuming build out of the planned system. This is to germane to the evaluation of serviceability because urban transit service is required for a city of Springfield's size, to ensure that new jobs can be accessible to that transportation disadvantaged and as an important means to reducing VMT. Thus, ability to reasonably provide public transit service to new urban areas is a critical and necessary component of serviceability in this case. The City, in consultation with Lane Transit District staff, considered whether extending public transit service to candidate expansion areas can reasonably be expected to be feasible to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology.

The City correctly applied the requirement of OAR 660-024-0060(7) in its analysis of third priority land under ORS 197.298 by evaluating and comparing water, sanitary sewer, storm water management, and transportation facilities in its analysis of "public facilities and services", as demonstrated in the summary of data in Table 11 and as further supported by evidence in the record.

The Public Services Analysis section, on pages 218-258 of this report provides a general overview and maps of existing water, sanitary sewer, storm water management, and transportation facilities the City referenced when it described the physical location and proximity of existing facilities to *potentially* suitable parcels, when it to identified physical or regulatory barriers that would make service extensions difficult or physically infeasible to support development within the 2010-2030 planning period, and when it evaluated impacts to facilities needed to serve lands already in the UGB. As previously noted, that section of the report provides explanation and evidence to support the City's findings addressing ORS 197.2989(1)though (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060 (1)(c), OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060 (7), OAR 660-024-0060 (8)(a), OAR 660-024-0060 (8)(b), and OAR 660-024-0060 (8)(c) — including additional evidence to support the City's rationale for excluding from consideration the **Oxbow/Camp Creek, Wallace Creek B** and **Mohawk** marginal land parcels in the City's previous step.

Table 11 summarizes and compares the opportunities and constraints associated with constructing public facilities and providing public services to lands in the vicinity of the Springfield UGB. The information summarized in Table X is based on information received from City engineering and transportation staff, the Springfield CIBL Technical Advisory Committee (TAC), service providers, public agency staff that were consulted with throughout the multi-year urbanization study process, and the public facilities plans identified in the previous sections of this report. In the Public Facilities and Services Analysis, the City identified physical constraints, engineering constraints, including legal constraints that affect or influence the physical placement of wastewater or stormwater management facilities.

The analysis includes a high planning level assessment of the relative degree of difficulty of providing public facilities and services. Early in the iterative multi-year analysis process, engineering and transportation staff, public service agency staff were asked to assign a numeric value ranging from 1-5 to assess and compare the relative degree of difficulty of providing public facilities and services to an area with 1= EASIER, 3=MEDIUM DIFFICULT, 5=DIFFICULT.[102] The relative rankings assigned were based on conceptual-level discussion of the wastewater, transportation, and stormwater improvements that would likely be needed to provide these public services to serve general areas, not individual parcels. Relative degree of difficulty addressed providing services to the edge of an area and did not include providing services internally within an area. These discussions and assessments were not based upon detailed analysis and are therefore subject to change. <u>Cost of service was not estimated or evaluated at this point in the analysis</u>.

In addition to the summary data compiled in Table 11, the record includes studies, facilities master plans, maps, documentation from engineering staff and service providers, demonstrating that the City uniformly evaluated and compared ability to provide urban services to all potentially suitable marginal land parcels when it identified potentially suitable ORS 197.298 third priority marginal land parcels.

[102] Draft Buildable Lands Inventory, 12/11/09 by City Engineer Ken Vogeney, input from Springfield Utility Board

In addition to the summary data compiled in Table 11, the record includes studies, facilities master plans, maps, documentation from engineering staff and service providers, demonstrating that the City uniformly evaluated and compared ability to provide urban services to all potentially suitable marginal land parcels as the factual basis to justify excluding ORS 197.298 third priority marginal land parcels from further analysis.

The City's conclusions regarding which lands to exclude are reasonable and supported by ample evidence.

Although third priority areas **Mohawk Marginal**, **Oxbow/Camp Creek Marginal and Wallace Creek B Marginal** were excluded from further consideration under OAR 660-009-0005(12) in the city's previous step because these lands lacked the appropriate site characteristics, these areas could also be dismissed under the public services analysis because providing water, sewer, stormwater and transportation facilities and service would be physically infeasible in the planning period 2010-2030.

Table 11 - Public Services Analysis of Potentially Suitable Marginal Land

Mohawk Marginal Parcels	
Water	**5 Difficult** • Isolated by distance and topography from existing urban services • Separated from urban services by the McKenzie River, must cross river with urban services • River is a barrier to extension of water transmission that makes extension of public water system infeasible[103] • Nearest water transmission line is a 16" line at Marcola Rd. /Hayden Bridge
Wastewater	**5 Difficult** • Separated from urban services by the McKenzie River, must cross river with urban services • Separated from urban services by the McKenzie River, must cross river with urban services • Will require pumping across the river and expanding capacity in existing sewer in Marcola Road (existing UGB). Geology precludes boring under river in this location. • Would require new trunk line from North Springfield Interceptor to and along Hayden Bridge Rd and new pump stations inside area to get flow to new trunk. Bridge is high point. Pump stations are needed to bring flow up to bridge and across river, then gravity flow to interceptor. Nearest collection system is a 10" line in Marcola Rd., 4 miles to outer areas
Stormwater	**5 Difficult** • Separated from urban services by the McKenzie River • No new outfalls permitted upstream from Hayden Bridge (Three Basin Rule[104]) • Eugene Water and Electric Board's water intake at Hayden Bridge would require significant separation from any new outfalls developed downstream from the

[103] See email from City Civil Engineer Clayton McEachern P.E., to Linda Pauly, dated 2/8/16 describing physical constraints to extending a water transmission line across the McKenzie River either via the existing bridge or by boring underwater.
[104] OAR 340-041-0350(1)(b) prohibits new or increased waste discharges that require NPDES permit, WPCF permit, or 401 Certification to the waters of the McKenzie River Subbasin above the Hayden Bridge (river mile 15).

	intake[105] • No developed system in vicinity
Transportation (including transit service)	**5 Difficult** • Isolated by distance and topography from existing urban services • Access to Springfield is across the McKenzie River via 42nd Street and Marcola Rd. (Rural Major Collector, 46-36' wide), Old Mohawk Rd. (Rural Minor Collector/Rural Local Collector, 30' wide), and Camp Creek Rd. (Rural Major Collector, 30' wide). [106] [107] Roads may need improvement to accommodate additional development and provide multi-modal access: • Upgrade 42nd St. to urban standards[108] • Upgrade 42nd/Marcola intersection • May need to upgrade 42nd and OR 126 interchange[109] • Upgrade Camp Creek to urban standards and provide capacity improvements • Would require internal collector street system. • Existing bridge in place, but would need to be improved to provide full urban standards including multi-modal access. • Urban standards and capacity improvements needed on existing and future collector system from Mohawk/Highway 126 interchange to area, including Hayden Bridge Rd, 19th St, 23rd St, and 31st St • Previous ODOT study showed a need for upgrading at Hwy 126 and 42nd St. (without UGB expansion). Traffic backs up at the 42nd St. rail crossing at entrance to the IP plant, causing delays with access to Hwy 126. • Located 1-5 miles mile from Highway 126/I-105, and I-5 • Steep slopes east of Marcola Rd. • Access would route traffic through farmland and rural residential areas • Marcola Road and Old Mohawk Road: "With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length." [110] • No transit services, pedestrian facilities or ADA access in area. Nearest service is Route 17 Hayden Bridge Rd. and 19th Street. Route Description: **"**The route begins at Springfield Station (Bay B) and travels North on 5th Street where it serves Springfield City Hall and Library and the Fred Meyer Shopping Center. The bus travels East on Hayden Bridge Place, North on 7th Street, West on Hayden Bridge Road, and South

[105] See email from City Civil Engineer Clayton McEachern P.E., describing physical factors that preclude construction of new stormwater outfalls in the vicinity of EWEB's Hayden Bridge McKenzie River water intake facility.
[106] Source of Functional Classifications: 2004 Lane County Transportation System Plan Functional Class Subarea 14 Map 4-14
[107] Source of road widths: Lane County Roads Inventory, http://www.lanecounty.org/Departments/PW/TransPlanning/Documents/AppendixB_RoadsInventory.pdf Accessed January 26, 2016
[108] Project # R-41 42nd St. from Marcola Rd. to railroad tracks is listed as a "20-year priority project" in the Springfield 2035 TSP Attachment A.
[109] See ODOT staff Helton email to staff Reesor, Dec. 29, 2008: "The interchange on Hwy 126 at 42nd St. has failing segments even with planned improvements, but it can probably be made to operate with additional improvements to the local system." Project #R-35 is identified as a "Beyond 20-year Project" in the 2035 Springfield TSP, Appendix A, p. 14.
[110] *Lane County Weight Restricted Bridges and Approved Route List* (Revised 02-2014), http://www.odot.state.or.us/forms/motcarr/od/4020.pdf, website accessed 2-5-16.

	onto 19th Street where it serves Mohawk Marketplace. The bus travels West on Q Street and South on 5th Street to return to Springfield Station."[111]
Urban services conclusion: **Mohawk Marginal**	The City excluded the **Mohawk Third Priority lands** from consideration because these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield's identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).
Wallace Creek A Marginal Parcels	
Water	**5 Difficult** • Parcels are separated from urban services by distance and topography • The nearest water transmission line is the 24" "Natron" water line, extended in 2013 to the SW corner of the school district property. The 16" line from Westwind/Linda Lane provides a looped system. • A planned 24" line will extend south from Weyerhaeuser Haul Rd. to serve the SE portion of the UGB. • Wallace Creek Rd. corridor alignment and topography are not conducive to infrastructure extensions. Extension of infrastructure along the Weyerhaeuser Haul Road alignment may be possible. • No developed system in vicinity • Marginal land parcels are located ~2.5 miles from the nearest water main. • Separated by at-grade rail crossing at Jasper Rd/Wallace Creek Rd.
Wastewater	**5 Difficult** • Separated from urban services by distance and topography • Parcels are located more than 1.5 miles from the UGB and more than 2 miles to the nearest trunk sewer (Jasper Trunk). • Wallace Creek Rd. corridor alignment and topography are not conducive to infrastructure extensions. Extension of infrastructure along the Weyerhaeuser Haul Road alignment may be possible. • It is anticipated one or two additional small pump stations may be needed to serve some portions of the area depending upon future development configuration and topography. • Capacity in Jasper Trunk Sewer is not expected to be a concern because flow timing and rates can be managed via the pump station. • Separated by at-grade rail crossing at Jasper Rd/Wallace Creek Rd. • No developed system in vicinity.
Stormwater	**5 Difficult**

[111] Email from LTD staff Will Mueller, dated June 28, 2013 provides comments describing the physical requirements necessary to provide transit service applicable to extending transit service to any new areas: "Connecting roadways and streets would need to be constructed to city standards that support LTD's buses including sufficient lane width, intersection curb radii, and sidewalk width at prospective bus stops to meet ADA standards in effect at time of construction (2013 standards require 8' sidewalks at bus stops).

	• Separated from urban services by distance and topography • No developed system in vicinity • Presence of wetland, Wallace Creek and intermittent streams on the two parcels may provide opportunity for stormwater conveyance and management if water quality standards can be met. • Physical connections to the Middle Fork Willamette River system can be made with little or no impact on existing stormwater systems. • Upgrade existing Wallace Creek stormwater outfall to Middle Fork Willamette River • New stormwater outfalls will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands. • The Middle Fork Willamette River is federally classified as critical salmonid habitat. • Stormwater management through the use of on-site retention and/or infiltration may be possible in flatter topo areas of parcels.
Transportation (including transit service)	**5 Difficult** • Isolated by distance and topography from existing urban services • Would require secondary access • Existing rail crossing at Jasper Rd/Wallace Creek Rd. is substandard. Upgrade would be needed. An at-grade crossing may not be feasible in this location. Existing traffic waiting to cross backs into Jasper Rd. 24 trains/day. • Wallace Creek Road will need improvement to urban standards. The existing narrow, winding alignment through sloped topography is a constraint. • DOGAMI SLIDO mapped landslide hazard area along Wallace Creek Road • Access via Jasper Rd., but urban standards and capacity improvements needed[112]: Improvement of the entire length of Jasper Road to urban standards and upgrade to 4 lanes to Main Street via South 42nd Street, including Union Pacific mainline crossing upgrades on South 42nd Street and intersection upgrades along the length of the entire corridor. • Topography limits expansion of Jasper Rd. portion of the narrow corridor next to the Willamette River • May trigger capacity improvements (4-lane section) for Bob Straub Parkway: Improvements to Bob Straub Parkway from Jasper Road to Daisy Street, upgrading to 4 lanes. • Intersection improvements will be needed at Bob Straub Parkway and Daisy Street. [113] • Jasper Rd. & Straub Parkway: "With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length." • Intersection improvements will be needed at Bob Straub Parkway and Jasper Road, which will include a new traffic signal. • A new road connection from Bob Straub Parkway to Jasper Road will be needed in the vicinity of Tax Lot 1802090000103, which will include a new grade separated crossing over the railroad. • Connection to Hwy 58 but limited connection to Hwy 126/I-5 • "Need to further study capacity at the I-5/Hwy 58th interchange. Improvements may be needed depending on size and location of expansion area." [114]

[112] See Jasper Bridge exception area
[113] Project #R-44 is identified as a "Beyond 20-year Project" in the 2035 Springfield TSP
[114] Comments received from ODOT Region 2, Area 5 staff Savannah Crawford, email dated June 18, 2013.

	• Nearest transit service is at Thurston Station on Main Street, >3 miles away.[115] No transit services, pedestrian facilities or ADA access in area. • "Main St/Straub Parkway intersection is failing today even with planned interchange improvements", and there are safety issues with signal. Traffic would need to be distributed differently. Significant development would need to participate in funding of ODOT IAMP. Impacts to the OR126/Main St intersection should be considered. ODOT's previous analysis indicate that the OR 126/Main St, Main St/54th St. and Main St/58th St all exceed capacity by 2031. "[116, 117]
Urban services conclusion: **Wallace Creek Marginal A**	The City excluded the **Wallace Creek Marginal A** parcels from consideration because the area does not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses in this location. Providing service to the area will present significant challenges not only in the length of improvements, but also the multiple at grade railroad crossings that will likely be needed along Jasper Road and Wallace Creek Rd. In addition, Jasper Road will likely need to be upgraded to provide capacity for employment development. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extensions and upgrades of water, wastewater and transportation, services including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield's identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).
Wallace Creek B Marginal Parcels	
Water	**5 Difficult** • Parcels are separated from urban services by distance and topography • The nearest water transmission line is the 24" "Natron" water line, extended in 2013 to the SW corner of the school district property. The 16" line from Westwind/Linda Lane provides a looped system. • A planned 24" line will extend south from Weyerhaeuser Haul Rd. to serve the SE portion of the UGB. • Wallace Creek Rd. corridor alignment and topography are not conducive to infrastructure extensions. Extension along Weyerhaeuser Haul Road alignment may be possible. • No developed system in vicinity • Marginal land parcels are located more than 3 miles from the nearest water main.
Wastewater	**5 Difficult** • Separated from urban services by distance and topography

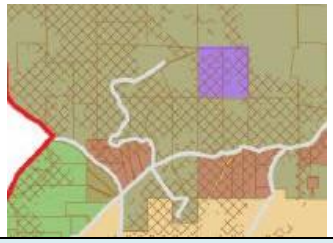
[115] Email from LTD staff Will Mueller, dated June 28, 2013 provides comments describing the physical requirements necessary to provide transit service applicable to extending transit service to any new areas: "Connecting roadways and streets would need to be constructed to city standards that support LTD's buses including sufficient lane width, intersection curb radii, and sidewalk width at prospective bus stops to meet ADA standards in effect at time of construction (2013 standards require 8' sidewalks at bus stops).

[116] Comments received from ODOT staff Crawford, meeting on June 11, 2013 and email dated June 18, 2013.

[117] Interchange improvements at Main St/Hwy 126 and Highway 126 at 52nd are listed as financially constrained projects in the Regional Transportation Plan (RTP).

	• No developed system in vicinity. • Parcels are located more than 1.5 miles from the UGB and more than 2 miles to the nearest trunk sewer (Jasper Trunk). • Wallace Creek Rd. corridor alignment and topography are not conducive to infrastructure extensions. Extension of infrastructure along the Weyerhaeuser Haul Road alignment may be possible. • It is anticipated one or two additional small pump stations may be needed to serve some portions of the area depending upon future development configuration and topography. • Capacity in Jasper Trunk Sewer is not expected to be a concern because flow timing and rates can be managed via the pump station.
Stormwater	**5 Difficult** • Separated from urban services by distance and topography • No developed system in vicinity • Physical connections to the Middle Fork Willamette River system can be made with little or no impact on existing stormwater systems. • Development of the area may require land acquisition to safely convey stormwater runoff to the River. • Upgrade existing Wallace Creek outfall to Middle Fork Willamette River New stormwater outfalls will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands. The Middle Fork Willamette River is federally classified as critical salmonid habitat. • Stormwater management through the use of on-site retention and/or infiltration would be challenging given the sloped topography.
Transportation (including transit service)	• Isolated by distance and topography from existing urban services • Would require secondary access • Marginal B parcels are remote, accessed via Jasper Rd.- Wallace Creek Rd. – to vicinity of R.R. Baker Rd. Topo separates from upper Wallace Creek Rd. • Existing rail crossing at Jasper Rd/Wallace Creek Rd. is substandard. Upgrade would be needed. An at-grade crossing may not be feasible in this location. Existing traffic waiting to cross backs into Jasper Rd. 24 trains/day. • Wallace Creek Road will need improvement to urban standards. The existing narrow, winding alignment through sloped topography is a constraint. • DOGAMI SLIDO mapped landslide hazard area along Wallace Creek Road • Access via Jasper Rd., but urban standards and capacity improvements needed[118]: Improvement of the entire length of Jasper Road to urban standards and upgrade to 4 lanes to Main Street via South 42nd Street, including Union Pacific mainline crossing upgrades on South 42nd Street and intersection upgrades along the length of the entire corridor. • Topography limits expansion of Jasper Rd. portion of the narrow corridor next to the Willamette River • May trigger capacity improvements (4-lane section) for Bob Straub Parkway: Improvements to Bob Straub Parkway from Jasper Road to Daisy Street, upgrading

[118] See Jasper Bridge exception area

	to 4 lanes. • Intersection improvements will be needed at Bob Straub Parkway and Daisy Street. [119] • Jasper Rd. & Straub Parkway: "With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length." • Intersection improvements will be needed at Bob Straub Parkway and Jasper Road, which will include a new traffic signal. • A new road connection from Bob Straub Parkway to Jasper Road will be needed in the vicinity of Tax Lot 1802090000103, which will include a new grade separated crossing over the railroad. • Connection to Hwy 58 but limited connection to Hwy 126/I-5 • "Need to further study capacity at the I-5/Hwy 58th interchange. Improvements may be needed depending on size and location of expansion area." [120] • Nearest transit service is at Thurston Station on Main Street, >3 miles away.[121] No transit services, pedestrian facilities or ADA access in area. • "Main St/Straub Parkway intersection is failing today even with planned interchange improvements", and there are safety issues with signal. Traffic would need to be distributed differently. Significant development would need to participate in funding of ODOT IAMP. Impacts to the OR126/Main St intersection should be considered. ODOT's previous analysis indicate that the OR 126/Main St, Main St/54th St. and Main St/58th St all exceed capacity by 2031. " [122, 123] 
Urban services conclusion: **Wallace Creek Marginal B**	The City excluded the **Wallace Creek Marginal B parcels** from consideration because the area does not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses in this location. Providing service to the area will present significant challenges not only in the length of improvements, but also the multiple at grade railroad crossings that will likely be needed along Jasper Road and Wallace Creek Rd. In addition, Jasper Road will likely need to be upgraded to provide capacity for employment development. Lands cannot reasonably be provided with urban services due to physical constraints of

[119] Project #R-44 is identified as a "Beyond 20-year Project" in the 2035 Springfield TSP

[120] Comments received from ODOT Region 2, Area 5 staff Savannah Crawford, email dated June 18, 2013.

[121] Email from LTD staff Will Mueller, dated June 28, 2013 provides comments describing the physical requirements necessary to provide transit service applicable to extending transit service to any new areas: "Connecting roadways and streets would need to be constructed to city standards that support LTD's buses including sufficient lane width, intersection curb radii, and sidewalk width at prospective bus stops to meet ADA standards in effect at time of construction (2013 standards require 8' sidewalks at bus stops).

[122] Comments received from ODOT staff Crawford, meeting on June 11, 2013 and email dated June 18, 2013.

[123] Interchange improvements at Main St/Hwy 126 and Highway 126 at 52nd are listed as financially constrained projects in the Regional Transportation Plan (RTP).

	distance and topography that preclude reasonable extensions and upgrades of water, wastewater and transportation, services including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield's identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).

The City relied on the findings in Table 11 —as further documented by referenced facility plans, maps and supplemental evidence in the record — to determine whether *potentially suitable* candidate second priority lands can be served with public water, wastewater, stormwater, and transportation including public transit systems within the 2010-2030 planning period based on physical constraints. In this step, the City excluded lands it deemed not serviceable based on physical constraints — and therefore not suitable — from further consideration in the UGB Alternatives Analysis.

The City's evaluation of alternatives and its conclusions regarding serviceability and thus suitability are based on a comparative analysis of physical facilities and services constraints that is appropriate for this level of planning. The City applied service comparison factors uniformly to the land under each priority.

As required in OAR 660-024-0060(8)(a), the City evaluated and compared the relative advantages and disadvantages of potentially suitable third priority marginal land by gathering and compiling data in Table 8: General Description of Third Priority Marginal Lands Parcels and Constraints and Table 11: Public Services Analysis of Potentially Suitable Marginal Land Summary. For the purpose of evaluating serviceability of parcels within the third priority [ORS 197.298(3)(b)], the City grouped the potentially suitable third priority parcels within general geographic areas. Based on this data, the City determined whether a parcel or group of marginal land parcels could reasonably be provided with the water, sewer/wastewater, stormwater, and transportation including transit facilities and services needed to urbanize land to accommodate the need deficiency determined under OAR 660-024-0050 within the 2010-2030 planning period.

The City correctly applied the requirement of OAR 660-024-0060(8)(a) in its analysis of third priority land under ORS 197.298.

As stated in OAR 660-024-0060(8)(b), the capacity of existing public facilities and services to serve areas already inside the UGB as well as areas proposed for addition to the UGB is a key factor to be considered in making a determination with respect to the provision of public facilities and services needed to urbanize alternative boundary locations, and thus capacity is a key factor to be considered in making a determination that a particular area is suitable to accommodate the need deficiency determined under OAR 660-024-0050.

As required in OAR 660-024-0060(8)(b), the City analyzed, evaluated and compared impacts to existing public facilities and services to serve areas already inside the UGB when it compiled data in Table 8: General Description of Third Priority Marginal Lands Parcels and Constraints and Table 11: Public Services Analysis of Potentially Suitable Marginal Land Summary. Based on this data, the City

determined whether and how providing a parcel or group of third priority marginal land parcels with the water, sewer/wastewater, stormwater, and transportation including transit services needed to urbanize land to accommodate the need deficiency determined under OAR 660-024-0050 would impact existing and planned public facilities and services within the 2010-2030 planning period.

The City correctly applied the requirement of OAR 660-024-0060(8)(b) in its analysis of third priority land under ORS 197.298.

As stated in OAR 660-024-0060(8)(c), the need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements on existing roadways — and as Springfield is an urban areas of 25,000 or more — the provision of public transit service, are key factors to be considered in making a determination with respect to the provision of public facilities and services needed to urbanize alternative boundary locations; and thus are key factors to be considered in making a determination that a particular area is suitable to accommodate the need deficiency determined under OAR 660-024-0050.

As required in OAR 660-024-0060(8)(c), the City evaluated and compared advantages and disadvantages with respect to the need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements on existing roadways and the provision of public transit service by gathering and compiling facilities maps and data in Table 8: General Description of Third Priority Marginal Lands Parcels and Constraints and Table 11: Public Services Analysis of Potentially Suitable Marginal Land Summary. The City collected public facilities data from ODOT and other Federal, State and Local agencies and service providers. Based on this data, the City determined whether a parcel or group of third priority marginal land parcels could be made accessible with the transportation facilities including transit services needed to urbanize land to accommodate the need deficiency determined under OAR 660-024-0050 within the 2010-2030 planning period.

The City correctly applied the requirement of OAR 660-024-0060(8)(c) in its analysis of third priority land under ORS 197.298.

The City excluded the third priority lands based upon specific land needs (197.298(3)(a)):

- **This step excluded parcels with less than 5 unconstrained acres.**
- **The City excluded lands based on slopes exceeding 7%, distance to I-5**
- **This step excluded Oxbow/Camp Creek Marginal from further analysis.**
- **This step excluded Wallace Creek Marginal A from further analysis.**
- **This step confirmed exclusion of Wallace Creek Marginal B parcels.**
- **This step excluded Mohawk Marginal parcels.**

The City excluded the third priority lands based upon inability to reasonably provide urban services due to physical constraints (197.298(3)(b))

- **This step confirmed exclusion of Mohawk Marginal parcels.**

- **This step confirmed exclusion of Wallace Creek Marginal A parcels.**
- **This step confirmed exclusion of Oxbow/Camp Creek Marginal parcels.**

ORS 197.298 (1)(b) Goal 14 Location Factor 3 – Second Priority Lands Analysis

To confirm its evaluation of *potentially* suitable marginal land sites to satisfy the employment land need deficiency, the City applied Goal 14 Factor 3 to evaluate the Far East A area exception parcels based on comparative ESEE consequences (Goal 14, Boundary Location, Factor 3), and based on compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4).

As previously noted, DLCD staff Gordon Howard provided an outline of the steps to be followed to exclude or include land:

- Exclude lands that are not buildable[124]
- Exclude lands based upon specific land needs (197.298(3)(a));
- Exclude lands based upon inability to reasonably provide urban services due to physical constraints (197.298(3)(b));
- Include lower priority lands needed to include or provide services to urban reserve lands (197.298(3)(c));
- **Exclude lands based upon analysis of comparative ESEE consequences (Goal 14, Boundary Location, Factor 3);**
- **Exclude lands based upon analysis of compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4)**

The City addressed Goal 14 Location Factor 3 as part of the ORS 197.298 evaluation process after making a determination of which third priority lands were potentially suitable based on parcel size size and lack of constraints, and after identifying potentially suitable parcels within a given geographic area grouping that could reasonably be serviceable by 2030. Goal 14 Location Factor 3 requires the City to make a determination that third priority parcels of land selected to be included in an urban growth boundary (UGB) will result in better environmental, social, energy, and economic (ESEE) consequences than the other lands of equal priority considered in this step and other alternative sites that were considered for inclusion and rejected. Under a Goal 14 Factor 3 analysis regarding public facilities and services, a local government may consider relative difficulty and cost differences between urbanizing alternative sites and may consider whether the amount of potentially suitable land within a geographic area could reasonably justify the extension of public infrastructure.

Mohawk Marginal, Wallace Creek Marginal A, and Oxbow/Camp Creek Marginal were excluded from further consideration for inclusion in the UGB based on physical constraints that preclude serviceability. It is important to note that although the City did not exclude these lands on the basis of comparative

[124] "Buildable" is a Goal 10 term. It is the City's position that OAR 660-024-0060 (1) requires the City to consider whether sites are "suitable" at this "buildable" stage in the evaluation process.

environmental, social, energy, and economic (ESEE) consequences, all of these excluded lands would be excluded under Goal 14 Location Factor 3: Comparative environmental, social, energy, and economic (ESEE) consequences solely on the basis of cost, at the point in the analysis when cost to provide public infrastructure and urban services is considered. The City's reasoning is based on a high level planning estimates of cost per linear mile[125], factors easily multiplied by the numbers of miles indicated in Table 11 needed to reach *potentially* suitable parcels of adequate size and slope, to calculate cost estimates for the comparative purposes of this analysis.

- **This step confirmed exclusion of Mohawk Marginal parcels**
- **This step confirmed exclusion of Wallace Creek Marginal A**
- **This step confirmed exclusion of Oxbow/Camp Creek Marginal.**

Table 12 Third Priority Marginal Land Excluded on the basis of specific land needs [ORS 197.298(3)(a)], Public Facilities [ORS 197.298(3)(b)], and ESEE Consequences
McKenzie View
Mohawk
Wallace Creek A
Wallace Creek B

As explained in this report, and supported by the substantive and evidence in the record, the City conducted a complete and thorough alternatives analysis of third priority lands adjacent to the UGB that was not limited to those lots or parcels that abut the UGB, but also included all land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency. [OAR 660-024-0060(4)].

The City determined that third priority lands adjacent to or in the vicinity of the UGB are not suitable to meet the identified employment land need and cannot reasonably accommodate the identified employment land need. The City's decision was reached after identifying and evaluating marginal land in the vicinity of the UGB, after identifying and evaluating potentially suitable parcels 5 acres or larger without absolute development constraints; after consultation with experts to identify needed site characteristics for the target industrial and commercial/mixed use industries identified in the CIBL/EOA that require sites 5 acres and larger and 20 acres and larger, including public facilities needs for industrial and commercial land development; after consultation with public facility and services providers including ODOT; after evaluation of exception land location and topography as it relates to the ability to extend public facilities of sufficient physical capacity and structure to support provision of urban services including water and wastewater mains and public transit service to UGB expansion areas; in consideration of applicable policies in the *Springfield Development Code* Chapter 5.7-100 for annexing

[125] For example, Springfield City Council Agenda Item Summary, April 28, 2014, ATT2 provided the Council with approximate unit costs of wastewater and transportation improvements to supplement the City Engineer's memorandum. "These analyses were not budget-level cost estimations but rather estimates whose principal value is to permit comparison of relative levels of cost."

territory; after consideration of infrastructure and transportation needs to serve lands already in the UGB as identified in the applicable *Eugene-Springfield Metropolitan Area Public Facilities and Services Plan,* applicable transportation system plans, facilities master plans and capital improvement programs; and after consideration of the City's development standards and requirements for urban development in the *Springfield Development Code* Chapters 3.2-300, 3.2-400, 3.2-600, 3.3-300, 3.3-300, 3.3-400, 3.3-500, 3.3-1000, Chapter 4 in its entirety and the *Springfield Engineering Design Standards and Procedures Manual*.

ORS 197.298 (1)(c) Conclusion – Third Priority Lands Analysis: After a thorough parcel-by-parcel evaluation, the City determined that urbanization cannot be directed to the marginal lands adjacent to the UGB because marginal lands are not suitable and cannot reasonably accommodate the identified specific industrial and commercial-mixed use land need for sites 5 acres and larger. Therefore, third priority marginal lands are inadequate to accommodate the amount of land because specific types of identified land needs cannot be reasonably accommodated on the marginal lands, and future urban services could not reasonably be provided to the marginal lands due to topographical or other physical constraints.

ORS 197.298 Conclusion: The City properly applied and followed the prioritization requirements in ORS 197.298 to the UGB alternatives analysis when it studied, evaluated and selected land which land to be included within the urban growth boundary amendment.

CONSIDERATION OF LAND OF LOWER PRIORITY [ORS 197.298(1)(d)]

ORS 197.298 (1)(d):

> *"If land under paragraphs (a) to (c) of this subsection is inadequate to accommodate the amount of land needed, fourth priority is land designated in an acknowledged comprehensive plan for agriculture or forestry, or both."*

ORS 197.298(2):

> *"Higher priority shall be given to land of lower capability as measured by the capability classification system or by cubic foot site class, whichever is appropriate for the current use."*

OAR 660-024-0060(1)(d):

> *"Notwithstanding subsection (a) to (c) of this section, a local government may consider land of lower priority as specified in ORS 197.298(3)."*

ORS 197.298(3)

> *"Land of lower priority under subsection (1) of this section may be included in an urban growth boundary if land of higher priority is found to be inadequate to accommodate the amount of land estimated in subsection (1) of this section for one or more of the following reasons:*
>
> *(a) Specific types of identified land needs cannot be reasonably accommodated on higher priority lands;*
>
> *(b) Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; or*
>
> *(c) Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands."*

After the City examined and excluded all land of higher priority for expansion under ORS 197.298 (1)(b) and (1)(c), and found those lands unsuitable and thus inadequate to accommodate the land need, the City's next two steps were to identify fourth priority land adjacent to and in the vicinity of the UGB that is potentially suitable to meet the need deficiency, [ORS 197.298 (1)(d)] and to evaluate potentially suitable land "by agriculture or forest land capability as measured by the capability classification system or by cubic foot site class, whichever is appropriate for the current use." [ORS 197.298(2)] In this next step, the City identified candidate UGB study areas lands for further evaluation and comparison under ORS 197.298(3) by 1) identifying fourth priority lands; and 2) prioritizing those lands as required under ORS 197.298(2):

"Higher priority shall be given to land of lower capability as measured by the capability classification system or by cubic foot site class, whichever is appropriate for the current use."

The statute directs the City to further prioritize lands land designated in an acknowledged comprehensive plan for agriculture or forestry for inclusion on the basis of the capability classification system or cubic foot class.

The statute directs the City to identify and evaluate both agriculture and forest lands in this step and without prioritize one over the other. Instead, the statute directs the analysis to consider "fourth priority land designated in an acknowledged comprehensive plan for agriculture or forestry, or both."

IDENTIFY FOURTH PRIORITY LAND DESIGNATED IN AN ACKNOWLEDGED COMPREHENSIVE PLAN FOR AGRICULTURE OR FORESTRY OR BOTH

With the exception of its western boundary located along Interstate Highway 5, nearly all of Springfield's UGB is surrounded by land designated in an acknowledged comprehensive plan for agriculture and forestry. As shown in Table 13, land designated in an acknowledged comprehensive plan for agriculture or forestry is present in every area adjacent to and in the vicinity of Springfield's UGB.

Table 13: Study Areas Containing Fourth Priority Agriculture and Forest Land

North Gateway	McKenzie View	Oxbow/Camp Creek
Hayden Bridge	Mohawk	North Springfield Highway
Far East	South Hills	West Jasper/Mahogany
Wallace Creek	Jasper Bridge	Mill Race
Seavey Loop	Thurston	Clearwater

Table 13 indicates study area groupings that contain areas designated for agriculture in the Lane Rural Comprehensive Plan with beige color, consistent with the color used to indicate the Agriculture plan designation in the Lane Rural Comprehensive Plan maps used in this analysis.

Table 13 indicates study area groupings that contain areas designated for forestry in the Lane Rural Comprehensive Plan with olive green color, consistent with the color used to indicate the Agriculture plan designation in the Lane Rural Comprehensive Plan maps used in this analysis.

Table 13 indicates study area groupings that contain areas designated for agriculture *and* forestry in the Lane Rural Comprehensive Plan with both colors.

This section of the report provides explanation and evidence to support the City's findings addressing ORS 197.298(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060

(1)(c), OAR 660-024-0060(1)(d),OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c), Goal 14, Boundary Location Factor 3; and Goal 14, Boundary Location, Factor 4.

To perform analysis of the much larger set of fourth priority lands adjacent or in the vicinity of the UGB, the City conducted analysis by geographic area groupings in its next step. Table 14 provides a general descriptive summary of the Fourth Priority lands adjacent to and in the vicinity of the UGB. Lands in the Preliminary Study area are organized geographically and are named consistently with the names used in the second and third priority lands analyses.

This step identified candidate fourth priority land that *could* potentially be added to the UGB if deemed suitable to accommodate the employment land need deficiency determined under OAR 660-024-0050. The City's description of each grouping in Table 14 includes maps and information to identify agriculture or forest plan designations, dominant soil capability classifications and general physical and locational characteristics.

The City's description of each exception area identified the presence of "absolute development constraints" (slopes >15%, floodway, wetlands, and riparian resource areas) in each area to provide data to inform its determination of which fourth priority land parcels or portions of parcels *may* potentially be suitable to accommodate the employment land need deficiency determined under OAR 660-024-0050.

For the purposes of the preliminary screening of fourth priority land in Table 14 , the City applied the same constraints criteria as those applied in the City's Commercial and Industrial Buildable Lands (CIBL) inventory of land inside the UGB:

- Slopes – slopes over 15% are considered unbuildable
- Floodway – areas within the floodway as mapped by FEMA are considered unbuildable
- Wetlands – areas identified in the national wetlands inventory or Springfield's local wetlands inventory are considered unbuildable
- Riparian resource areas – areas identified by Springfield or Lane County as riparian resource areas are considered unbuildable.

OAR 660-009-0005(2)

> *"Development Constraints" means factors that temporarily or permanently limit or prevent the use of land for economic development. Development constraints include, but are not limited to, <u>wetlands, environmentally sensitive areas such as habitat</u>, environmental contamination, <u>slope, topography</u>, cultural and archeological resources,*

infrastructure deficiencies, parcel fragmentation, or natural hazard areas." [emphasis added]

OAR 660-009-0005(11)

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

The development constraints applied in the City's analysis are constraints identified in OAR 660-009-0005(2) and site attributes identified in OAR 660-009-0005(11).

For the purposes of increasingly detailed analysis to determine suitability of potentially suitable fourth priority land in Table X to meet the site needs of the City's target employers and in addition to excluding lands with slopes 15% or greater, the City applied the following needed site characteristic parameters applicable to the City's target employment industries[1]:

- Springfield's target manufacturing industries require sites sloped 5% or less.
- Springfield's target commercial and mixed use employers require sites sloped 7% or less.

The constraint of "infrastructure deficiencies that temporarily or permanently limit or prevent the use of land for economic development" is identified separately in the Public Facilities Analysis.

The City used industry standard GIS mapping and measuring tools and methods to quantify parcel and constraints data for evaluation as groupings were selected for further analysis in the UGB study.

Table 14 provides a general descriptive summary of the Fourth Priority lands in the vicinity of the UGB. Table 14 provides a context photo[2] and two side-by-side maps of each Preliminary Study area grouping: 1) an excerpt from the Lane County Map viewer plan map indicating LRCP plan designation;[3] [4] and 2) an excerpt from Map 4: LRCP plan designation, ECONorthwest, December 2008 indicating soil classification.

These map excerpts are color keyed as shown on the following page.

[1] CIBL/EOA pp. iii-iv, pages 82-95, Appendix C., pages 167-178.
[2] Context photos are screenshots from Bing maps accessed March 10-11 via links in RLID.
[3] http://lcmaps.lanecounty.org/LaneCountyMaps/ZoneAndPlanMapsApp/index.html accessed March 10, 2016
[4] land designated Agriculture in the Metro Plan west of I-5 is shown in a different brown map color and is indicated by an "A" on the parcel. For example, the land west of I-5 west of the North Gateway study area and west of Armitage Rd. is designated "Agriculture" in the Metro Plan and zoned EFU30.

LRCP plan designation map legend	Soil classification map legend
Rural Plan Designation RCP Plan Designation F - Forest A - Agricultural ML - Marginal C - Commercial I - Industrial R - Residential NRES - Non Resource P - Parks AIR - Airport NR:CA - Natural Resource Conservation Area E - Estuary DR - Destination Resort NR:M - Natural Resource : Mineral PF - Public Facility NR:W - Natural Resource : Wildlife	capability class Class 1 Class 2 Class 3 Class 4 Class 5 Class 6 Class 7 Class 8

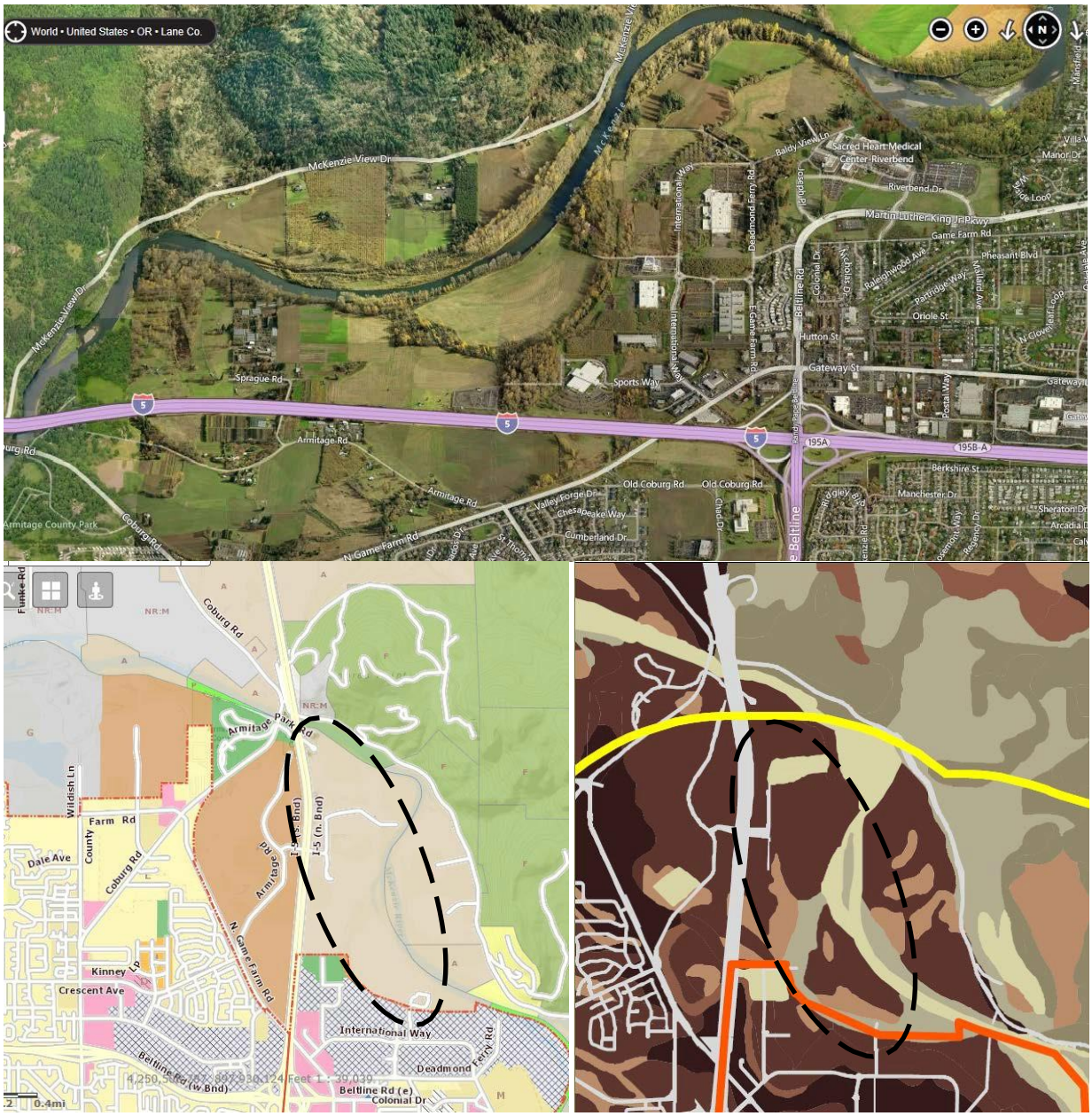
Where shown, the red line in the small maps below is the UGB.

The City's findings describe or map all of the alternative resource land areas evaluated in the boundary location alternatives analysis as required by OAR 660-024-0060(6). The City's analysis involves more than one parcel or area within a particular priority category in ORS 197.298 for which circumstances are the same, so as permitted under OAR 660-024-0060(6), the City is allowed to consider and evaluate these parcels or areas as a single group. The City analyzed parcels within a priority category by capability classification groupings as permitted under OAR 660-024-0060(6).

In addition to the summary data compiled in Table 14, the record includes maps, acreage calculations and other evidence demonstrating that the City uniformly evaluated soils, parcelization, slopes, floodway, inventoried wetlands, waterways, and riparian resources on resource land parcels in the preliminary study area as factual basis to justify excluding ORS 197.298 lands parcels from further analysis.

Table 14: General Description of Fourth Priority Land

North Gateway



- The North Gateway preliminary study area consists solely of the land east of Interstate Highway 5 between the Springfield UGB and the McKenzie River. Lands east and north of the river are in the McKenzie View study area grouping.
- With the exception of the NW corner of the study area (Armitage Park), the North Gateway site is designated Agriculture.
- The area has large, potentially suitable parcels that abut the Springfield UGB and land designated Campus Industrial in the Metro Plan, including parcels 20 acres and larger.
- Area abuts and is highly visible from Interstate Highway 5.
- Area is flat with some slopes along the banks of the river, slough, freeway and the Sprague overpass

embankment

- Floodway, riparian resources and wetlands along the river and Maple Island Slough, hydric soils
- Entire study area is in the floodplain
- Soil classification is mixed. Area comprises Class II, IV, VII, and VIII. Predominantly Class II overall, with Class VII and VIII soils along the river and sloughs.
- The parcels adjacent to and abutting UGB in the southern portion of the area have higher priority for inclusion under ORS 197.298 because the tracts are not composed predominantly of soils classified as prime, unique, Class I or II and high value (ORS 215.710(3)(a)-(d):[5]
    - 1703154000 400 54% of tract is not high value farmland (Class II, IV,VII, VIII)
    - 17031000 2500 56% of tract is not high value farmland (Class II, IV,VII, VIII)
- 17031000 2400 89% of tract is high value farmland (Class II, IV and VIII)
- Parcels north of Sprague consist of predominantly high value soils – lower priority for expansion.
- Presence of hydric soils may indicate wetlands.
- Sensitive Drinking Water Protection Overlay zone: I-5 well (located on EWEB site)
- 1703154000 801 is developed with EWEB power electrical transmission facilities and Rainbow/SUB wells
- Accessed via Corporate Way from the south or via Gateway St. - North Game Farm Rd - Armitage Rd - Sprague Rd Overpass from the south or west.
- Area was identified by the CIBL Technical and Stakeholder Advisory Committees as a potential employment area worthy of further study in the Preliminary CIBL Analysis (2008-2009), and was included in draft alternatives reviewed by the Joint Planning Commissions and Springfield City Council.

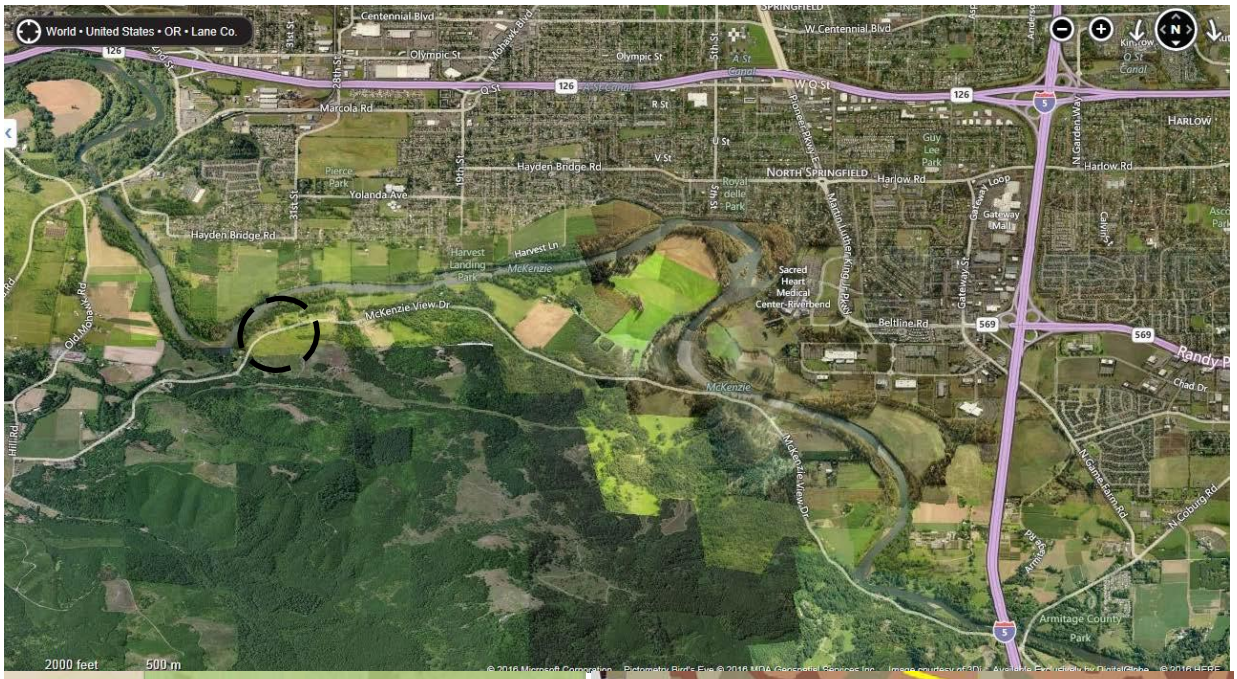
1703154000 400

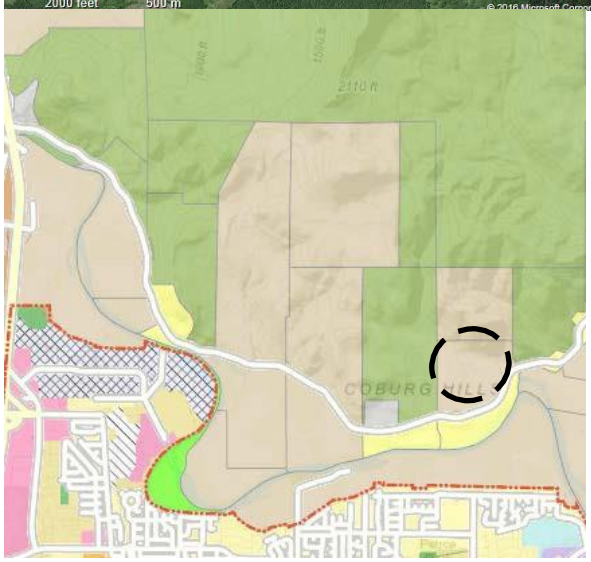
170310000 2500

170310000 2400

[5] The City used RLID data to calculate % of soil units in a tract.

McKenzie View

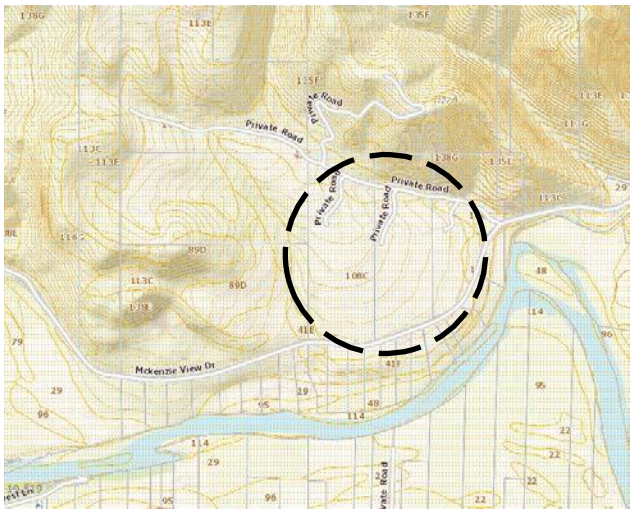




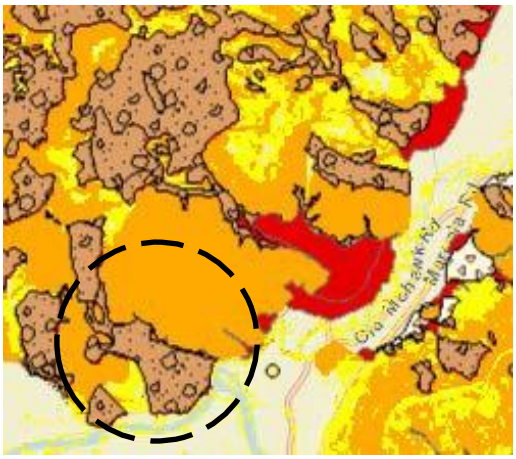
- The McKenzie View preliminary study area consists of the land north of the McKenzie River between Interstate Highway 5 and Marcola Road (Hayden Bridge).
- Land is across the McKenzie River from Springfield and no bridges exist between Interstate Highway 5 and Hayden Bridge/Marcola Rd.
- Fourth Priority lands are designated Agriculture and Forest.
- Soil classification is mixed. Area comprises Class I, II, III, IV, VI, VII, and VIII. Predominantly Class II soils along the river. Predominantly Class VI in the hills.
- Large parcels are across the river, none are adjacent to UGB.
- Slopes and soils:
  - Predominantly slopes >15% I-5 to Mohawk River on north side of McKenzie View Drive except one area of slopes <15% is shown on map, soil is Class VI (108C- Philomath 3-12% slopes)
  - 17021800 402
  - 17021800 403

- 17021800 404
- Slopes 15% or less I-5 to Mohawk River on south side of McKenzie View Drive Lands slopes are predominantly Class II

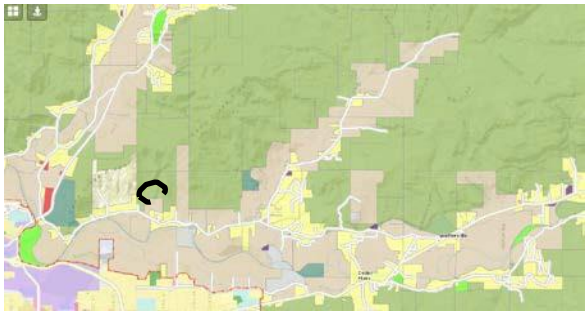
- DOGAMI mapped landslide hazards in Coburg Hills
- Floodway, riparian resources and wetlands along the river
- accessed via Coburg Rd - McKenzie View Drive; or from Marcola Road - Old Mohawk Road - Hill Road - McKenzie View Drive.



McKenzie View site topography and Cl. VI soil

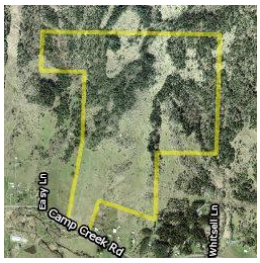

McKenzie View site DOGAMI hazards

Oxbow/Camp Creek



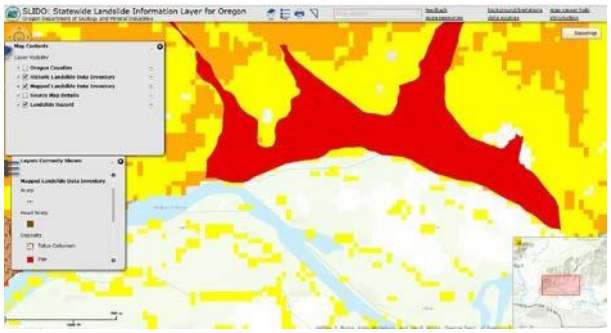
- The Oxbow/Camp Creek preliminary study area consists of the land north of the McKenzie River between Marcola Road (Hayden Bridge) and Hendricks Bridge, excluding the Mohawk Valley.
- Land is across the McKenzie River from Springfield and no bridges exist between Interstate Highway 5 and Hayden Bridge/Marcola Rd.
- Fourth Priority lands are designated Agriculture and Forest.
- Soil classification is mixed. Area comprises Cl I, II, II, IV, VI, VII, VIII soils. Predominantly Class II soils along the river. Predominantly Class VI in the hills. Some Class I along Upper Camp Creek.
- Large, unconstrained parcels are located across the river, not adjacent to UGB.
- Large unconstrained parcels south of Camp Creek Road are predominantly Class II soils.
- Unconstrained portions of parcels north of Camp Creek Road are predominantly Class III soils (105A Pengra 1-4% slopes, and Class VI 108F Philomath 12-45% slope)
    - 17022200 200 approx. 31 acres Class III, slopes 15% or less (4% 105A), EFU
    - 17022200 103 approx. 11 acres Class III, slopes 15% or less (105A – Pengra 1-4% slopes, 113E, 102C), EFU
    - 17022300 300 approx. 6.8 acres Class III, slopes 15% or less (105A – Pengra 1-4% (105A – Pengra 1-4% slopes, 47% 108C Philomath, EFU, BPA easement
- Large unconstrained parcels west of Upper Camp Creek Road are Class I, II and III soils lower priority for expansion
- DOGAMI mapped landslide hazards in Coburg Hills
- riparian resources and wetlands along the McKenzie River

- accessed via Marcola Road – Camp Creek Road from the south; or via Hendricks Bridge – Millican Road – Camp Creek Road from the east; or via Coburg Road – McKenzie View Drive – Old Mohawk Road – Mohawk Road
- Armitage Rd - Sprague Rd overpass - McKenzie View Drive, or from Marcola Road - Old Mohawk Road - Hill Road - McKenzie View Drive.



17022200 200

17022200 103

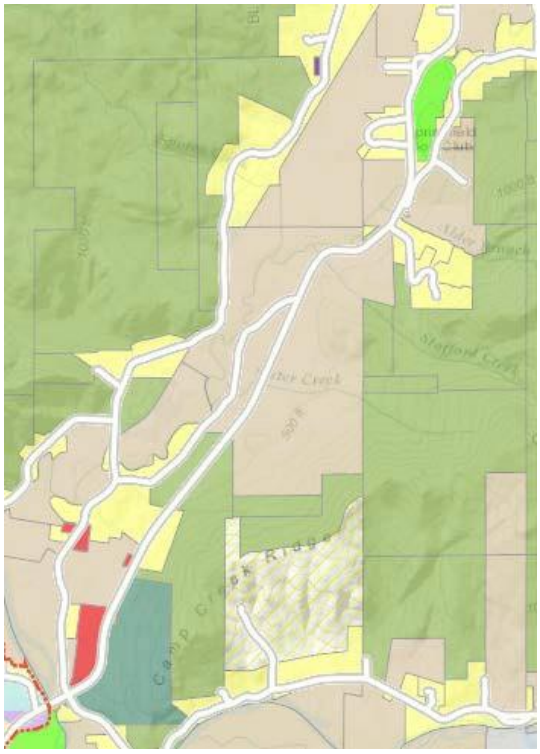


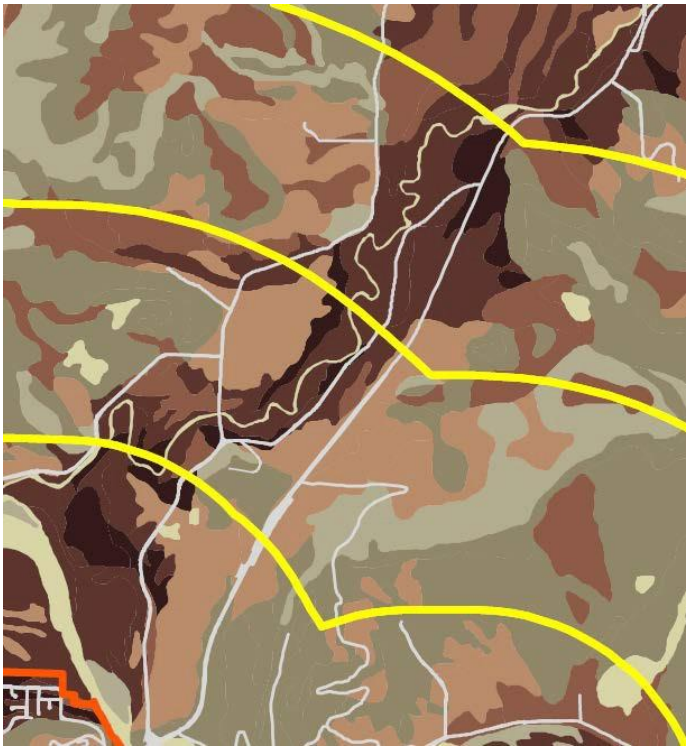
DOGAMI mapped landslide hazards north of Camp Creek Rd.

Hayden Bridge

- The Hayden Bridge preliminary study area consists of the land between the UGB and the McKenzie River extending between the vicinity of Harvest Lane and Marcola Road and the Springfield UGB and the McKenzie River.
- Entire area is designated Agriculture.
- Part of a larger block of agricultural land that extends north of the McKenzie River into the McKenzie View and Mohawk study areas
- Predominantly Class II soils. Area comprises Class II, III and IV.
- The area has large parcels that abut and are split by the Springfield UGB along Hayden Bridge Road, including several parcels larger than 20 acres.
- The area abuts urbanizable land designated for and developed with urban and urbanizable Low Density Residential uses.
- Topography is flat.
- Floodway, riparian resources and wetlands along the river
- Drinking Water Protection Overlay District: Pierce and Chase wells
- Accessed via Hayden Bridge Road and Harvest Lane
- Lower priority for inclusion under ORS 197.298 because parcels consist of predominantly high value soils.

Mohawk



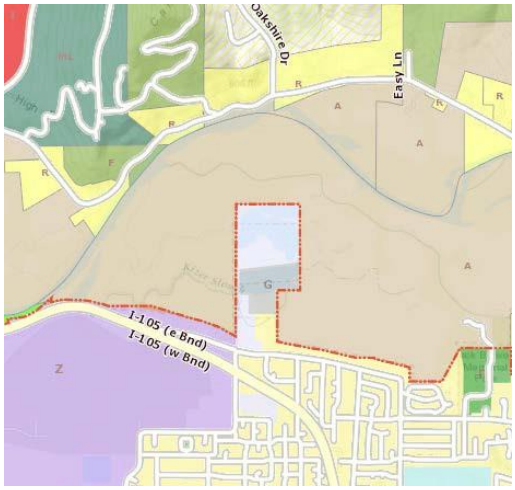


- The Mohawk preliminary study area consists of the land north of the McKenzie River along Marcola Road (Hayden Bridge)
- Land is across the McKenzie River from Springfield
- Fourth Priority lands are designated Agriculture and Forest.
- Large parcels are across the river, not adjacent to UGB
- DOGAMI mapped landslide hazards in Coburg Hills and Camp Creek Ridge
- Floodway, riparian resources and wetlands along the McKenzie and Mohawk Rivers
- Presence of hydric soils
- accessed via Marcola Road – Camp Creek Road from the south; or via Hendricks Bridge – Millican Road – Camp Creek Road from the east; or via Coburg Road – McKenzie View Drive – Old Mohawk

Road – Mohawk Road

- Armitage Rd - Sprague Rd overpass - McKenzie View Drive, or from Marcola Road - Old Mohawk Road - Hill Road - McKenzie View Drive.
- Predominantly forestland
- Agricultural soil classification is mixed. Predominantly Class II with some Class I along the Mohawk and McKenzie Rivers. Area comprises Class I, II, III, IV, VI, and VII.
- Part of larger block of agricultural land that includes the Hayden Bridge and McKenzie View areas
- Large, unconstrained parcels west of Mohawk Road have Class I/II soils; and Class II/III (130 Waldo High Value), 1A Abiqua, 78 McAlpin High Value
- Large unconstrained parcels east of Mohawk Road are Class IV soils: predominantly 85 Natroy High Value/78 McAlpin High Value
- Lower priority for inclusion under ORS 197.298 because unconstrained large parcels consist of predominantly high value capability class soils.
- Presence of hydric soils may indicate wetlands.
- Area was identified by the CIBL Technical and Stakeholder Advisory Committees as a potential employment area worthy of further study in the Preliminary CIBL Analysis (2008-2009), and was included in draft alternatives reviewed by the Joint Planning Commissions and Springfield City Council.

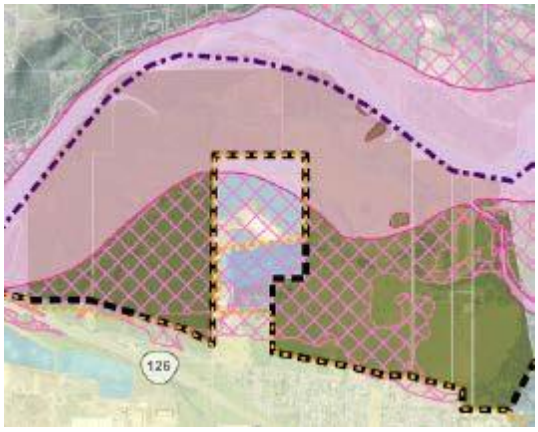
North Springfield Highway



- The North Springfield Highway preliminary study area consists of the land between the UGB and the McKenzie River west to east between the Oxbow and Ruff Park, and extending north-south between the Springfield UGB and the McKenzie River.
- Entire area is designated Agriculture.
- part of a larger block of agricultural land that extends on both sides of the McKenzie River west into the McKenzie View and Mohawk study areas an east to the Far East study area.
- Predominantly Class II soils. Area comprises Class I, II, III, IV, VII soils.
- The area has very large parcels (predominantly Class II, mixed with I, II and IV) that abut the Springfield UGB along High Banks Road at 52nd Street
- The parcels adjacent to and abutting UGB in the southern portion of the area have lower priority for inclusion under ORS 197.298 because they consist of predominantly high value soils.
- The area abuts land in the UGB designated for and developed with Heavy Industrial (Bluewater Boats),

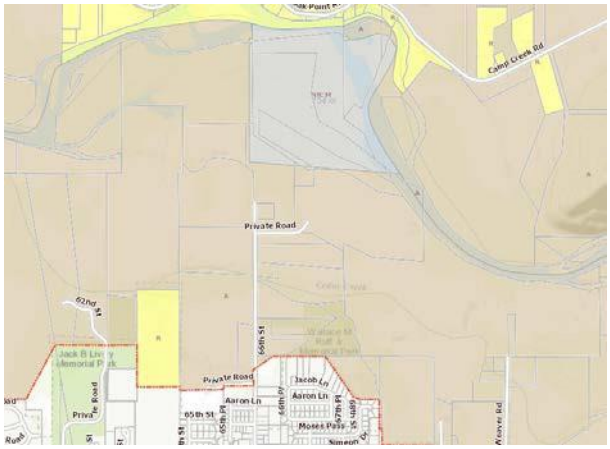
Low Density Residential and Park uses.

- Slopes are flat.
- Floodway, riparian resources and wetlands along the river
- Floodplain
- Drinking Water Protection Overlay zone: Plat 1 and 2 wells
- Convenient access to Interstate Highway 5 via Interstate Highway 105/State Highway I26B at 52nd Street
- 52nd Street (inside the UGB from the south to High Banks Rd.) is classified as a Major Collector Street in the TSP. High Banks Road between 52nd and 58th is classified as a Major Collector Street in the TSP.
- Filbert orchards
- Area was identified by the CIBL Technical and Stakeholder Advisory Committees as a potential employment area worthy of further study in the Preliminary CIBL Analysis (2008-2009), and was included in draft alternatives reviewed by the Joint Planning Commissions and Springfield City Council.
- Area has suitable large parcels larger than 20 acres.

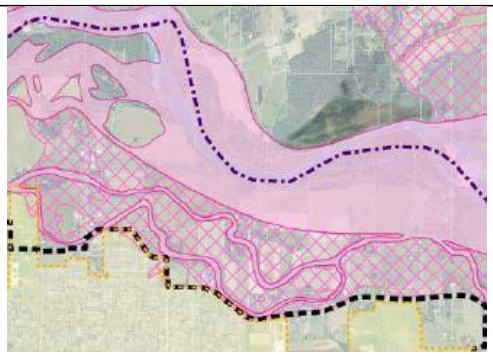


Floodway extent (area in solid pink color)

Thurston

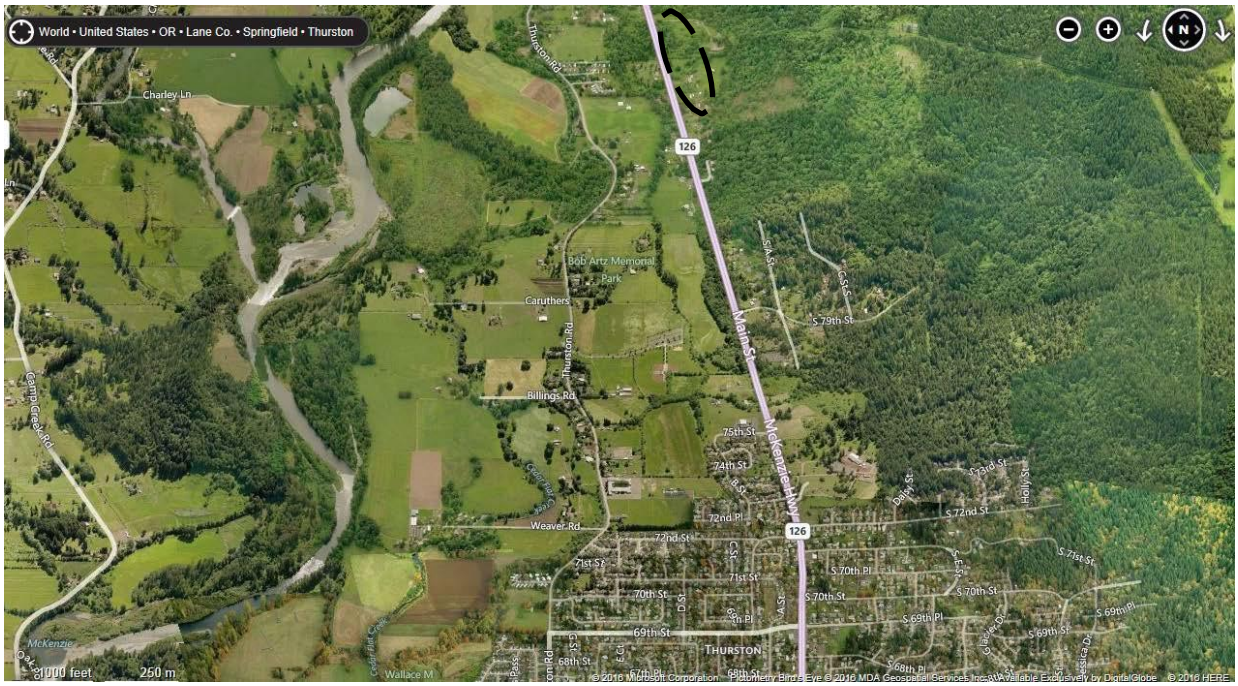


- Abuts UGB
- Part of a large block of agricultural land.
- Soils capability classification is mixed. Area comprises Class I, II, IV and VII, predominantly Class II.
- Constrained by floodway, riparian resources (McKenzie River, Cedar Creek), wetlands
- Drinking Water Protection Overlay District: Thurston, Thurston Middle School, Platt 1 and Platt 2 wells
- Lower priority for inclusion under ORS 197.298 because parcels consist of predominantly high value soils.



Floodway extent (solid pink color)

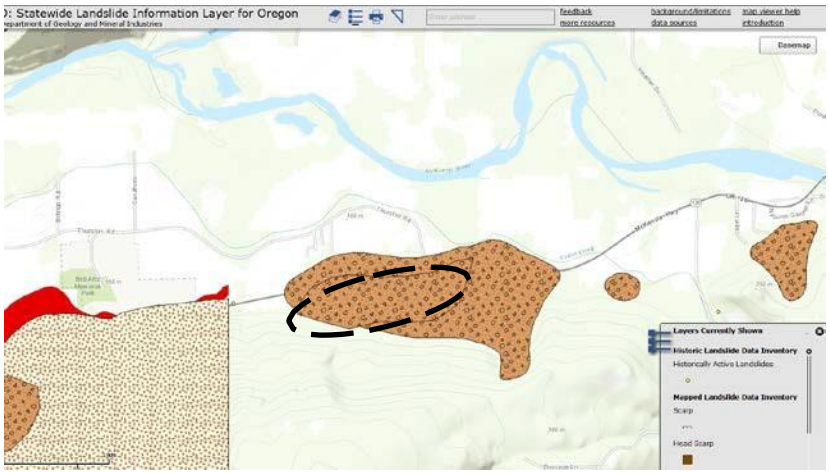
Far East



- Area comprises Class I, II, III, IV, VI, VI, VII, VIII soils; predominantly Class II and flat topography north of Highway 126; predominantly Class IV south of Highway 126 constrained by slopes 20-30%; (52D Hazelair 7-20 % slopes)
- Large Agriculture parcels 6-13 acres in size north of Highway 126 comprise predominantly Class I and II soils.
- Most of the lands south of Highway 126 are sloped 15% or greater. Forest parcels 6-24 acres in size on the south side comprise Class IV soils and are constrained by slopes. Portions of (5) Forest parcels have slopes 15% or less in the area indicated on the maps above.
- DOGAMI landslide hazards
- Floodway north of Cedar Creek, riparian resources McKenzie River, Cedar Creek
- Drinking Water Protection Overlay District: Thurston Middle School and Thurston wells
- Sand and Gravel natural resources
- Adjacent City Low Density Residential development, and County Rural residential development, mobile home park
- Unconstrained large parcels (north of Highway 126) are lower priority for expansion under ORS 197.298

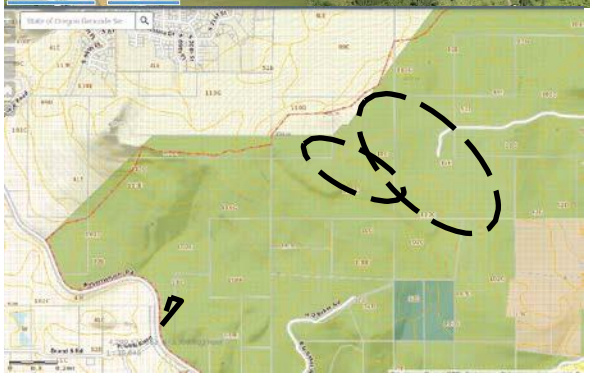
based on predominance of Class I and II soils.

- The area north of Highway 126 was excluded on the basis of soils capability classification.
- Unconstrained large parcels (south of Highway 126) are higher priority for expansion under ORS 197.298, but slopes 7-35% exceed suitability for industrial and commercial mixed use office development. This area was excluded on the basis of specific land needs (197.298(3)(a)) because sloped topography greater than 7% is not suitable for the needed uses.



DOGAMI mapped landslides

South Hills

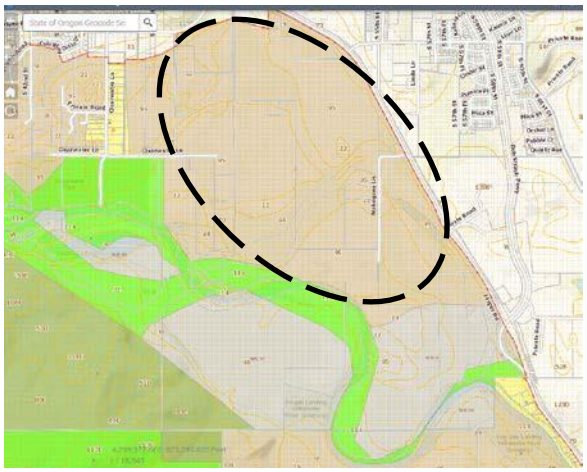


- Lands are designated Forest and Agriculture
- Soil capability class is mixed. Area comprises Class III, IV, VI, VII soils.
- Some parcels abut the UGB along the SE ridgeline, remote, isolated
- Large parcels, mostly in public ownership (Willamalane,[6] BLM)
- Most of the South Hills are is constrained by slopes >15% and thus not suitable for industrial and commercial mixed use employment purposes
- One 200+ acre area of flatter slopes comprises Class III soils (11C Bellpine[7] soil, 3-12% slopes; 12E Bellpine 2-30% slopes; 52D Hazelair 7-20% slopes), is remote from Springfield.
- 18021100 302 11.8 unconstrained acres, slopes constraints and irregular shape make site unsuitable for large lot development, isolated Class VI (102C Panther 2 to 12% slopes)
- DOGAMI mapped landslide hazards
- The lands with flatter slopes are predominantly high value soils, lower priority for expansion under ORS 197.298, remote from Springfield
- Study area comprises higher priority soils under ORS 197.298, but lands with higher priority soils are not suitable for employment purposes.

[6] The Willamalane parks and open space acquisition includes 232 acres outside the UGB, described in Willamalane *Draft Thurston Hills Natural Area Management Plan*, March 2016, pp. 1-12 and "Map 1."

[7] Class III Bellpine is identified in OAR 660-033-0030(8)(a) as meeting the definition of "High Value Farmland"

West Jasper/Mahogany



- Study area includes large parcels designated Agriculture
- Floodway, riparian resources and wetlands along the Middle Fork Willamette River
- Flood plain
- Agricultural capability classification is mixed. Area comprises Class II, IV, VII, and VIII.
- Predominantly flat topography
- Wetlands, hydric soils
- Study area includes productive farmland
- 2 BPA easements cross the study area
- Suitable large parcels abut UGB along Jasper Road, including parcels larger than 20 and 50 acres
- EFU tracts comprising predominantly Cl II high value soils, lower priority for expansion[8]:

[8] See detailed maps in the record: West Jasper/Mahogany study area

- 18020400 1600
- 18020400 2701
- 18020900 2600
- 18020100 500
- 18020900 1402
- 18020900 1403
- 18020800 200

- (5) EFU tracts are not predominantly high value farmland, higher priority for expansion:
  - 18020900 200 (62.4 acres): 53% cl VII and VIII, 44% Cl II
  - 18020900 301 (8.4 acres) 64% Cl VII, 17% Cl III, 10% Cl VIII water, 9% Cl II
  - 18020900 203 (22.7 acres): 78% Cl VII, 8% Cl VIII water, 12% Cl III, 2% Cl II
  - 18020400 2401 (6.1 acres): 28% Cl VII, 26% Cl III, 46% Cl II
  - 18020400 3000 (54.5 acres):
- 18020900 1300 is public land: Oregon Dept. of State Lands
- Proximate (across Jasper Road) to un-annexed land designated for Industrial uses inside the UGB (Jasper-Natron) and land within the City Limits that is planned and partially developed with residential uses (Jasper Meadows), school and park uses.
- Area was identified by staff (2013) as a potential employment area worthy of further study in the UGB Study Area and was included in draft alternatives reviewed by the Springfield City Council in 2013-2014.

18020400 3000

18020400 2701

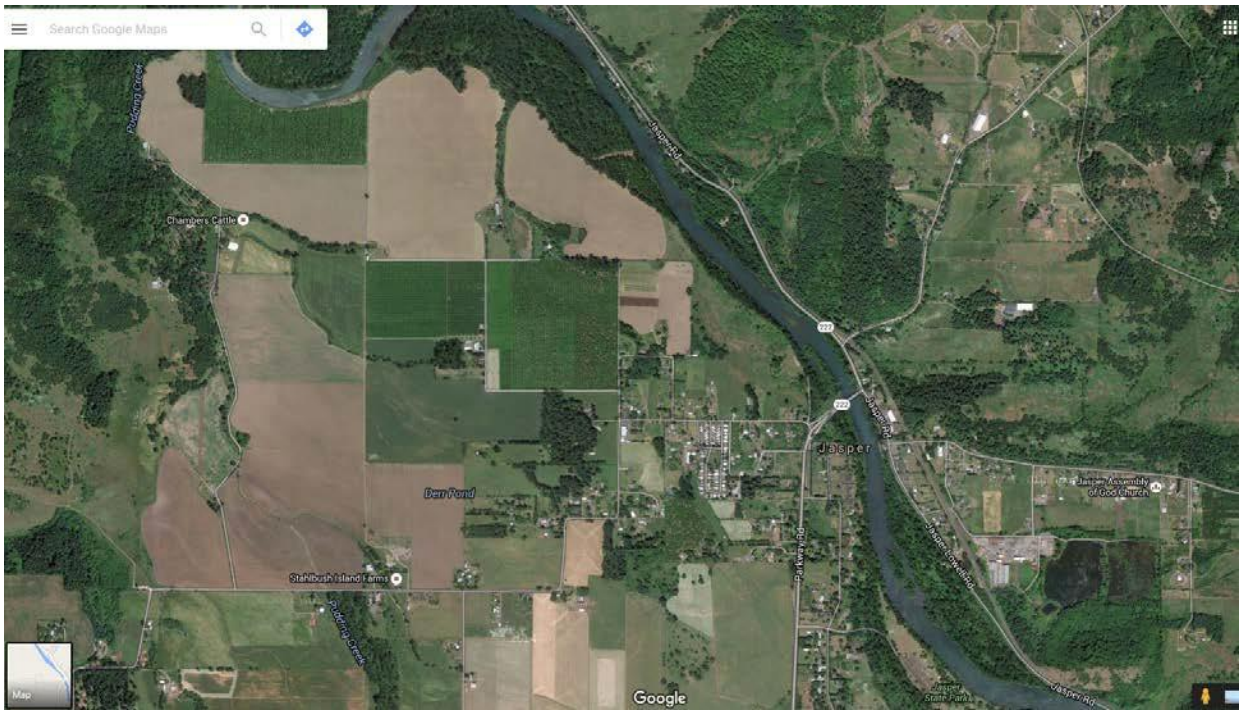
18020400 2401

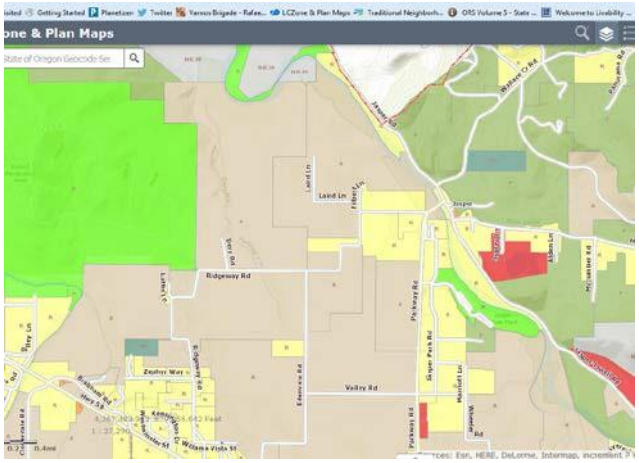
18020900 203

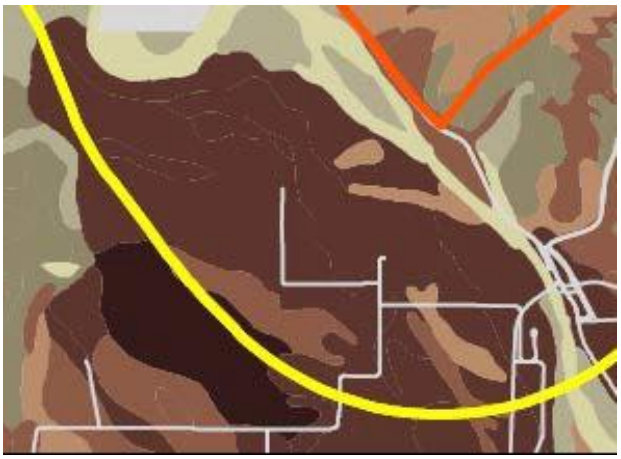
18020900 200

18020900 301

Jasper Bridge

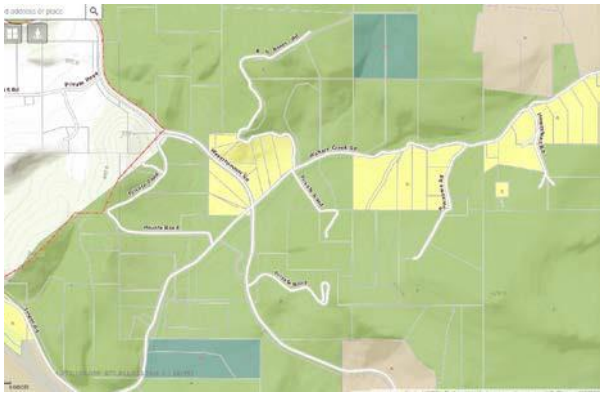


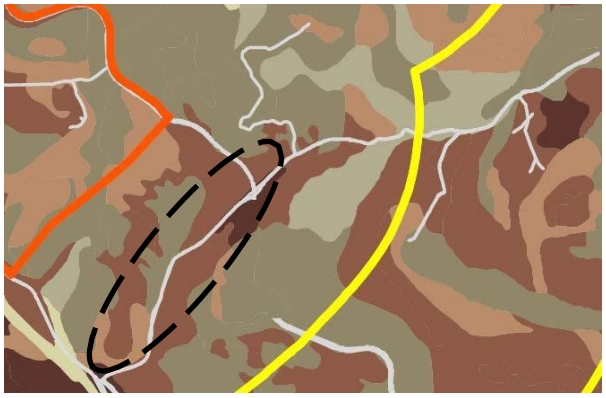




- Study area includes large parcels designated Agriculture
- Floodway, riparian resources and wetlands along the Middle Fork Willamette River
- Flood plain
- Agricultural capability classification is mixed. Area comprises Class I, II, II, and IV. Predominantly Class II.
- Productive farmland
- Predominantly flat topography
- Wetlands
- Large block of Class I and II soils – lower priority for expansion under ORD 197.298

Wallace Creek





- Designated Forest
- Abuts UGB along ridgeline
- Constrained by slopes >15%
- Soil capability class is mixed. Area comprises Class II, III, IV, VI, VII soils.
- Philomath 3-12% (olive green), McAlpin (intersection w/ Wey. Rd.) HazelAire 2-7%
- Flatter slope areas are Class II, III and IV soils.
    - 1802140000 801: 52% Cl II and III (Bellpine HV), lower priority for expansion
    - 1802140000 501: 79% Cl II, lower priority
    - 1802140000 905: 50% Class III (Bellpine HV), low priority, slopes 12-20%

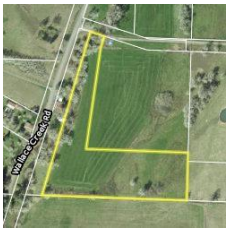
    - 1802140000 900: 51% Cl VI, 49% Cl. II (inc. 41% Bellpine Cl III HV)
    - 1802140000 800: 66% Cl III, 28% Cl VI, 6% Cl II
    - 1802140000 500: 46% Cl III, 28% Cl VI, 14% Cl IV, 11% Cl II, 1% Cl VI
    - 1802140000 903: 89% Cl III, 7 ac. wetland

- 1802140000 902: 94% Cl III
- 1802140000 1303: 19 ac. 77% Cl VI

1802140000 900

1802140000 800

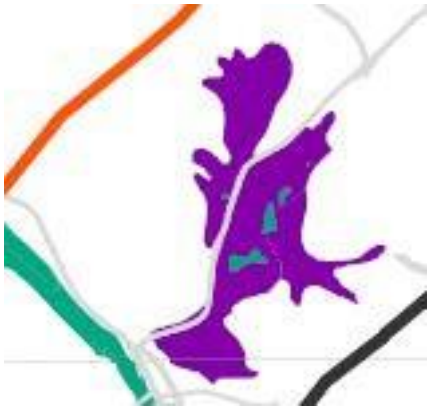
1802140000 500



1802140000 902 & 903

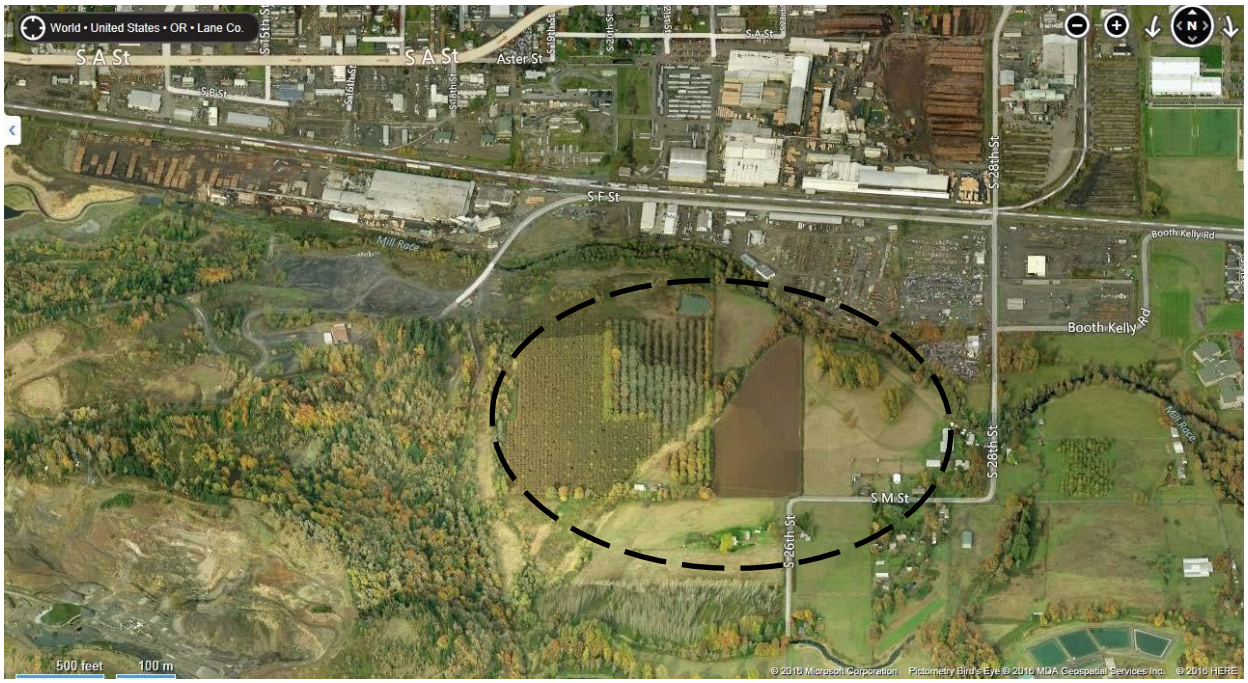
1802140000 1303

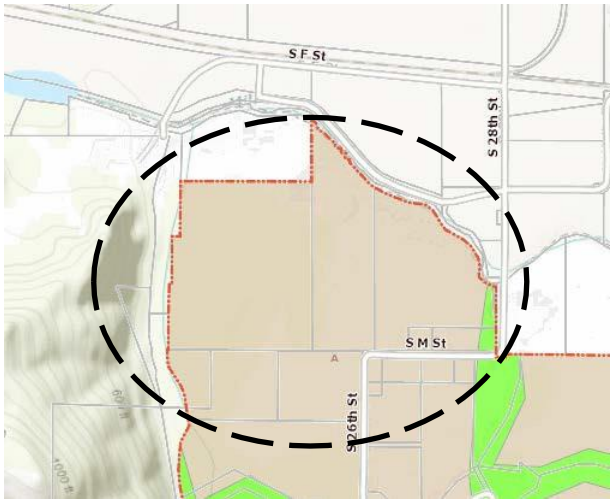
Slopes >15%



Hydric soils and NWI wetlands

Mill Race





- The Mill Race preliminary study area grouping consists of the land south of the UGB along South 28th, South M and South 26th Streets. Area is immediately east of Springfield/Quarry Butte and south of the Mill Race, a tributary of the Willamette River. The land to the west is an operating rock quarry (Knife River).
- The Mill Race employment land study area grouping is designated Agriculture. The area abuts publically-owned and privately-owned land designated Agriculture and Parks.
- The area has large, potentially suitable parcels including parcels 20 acres and larger that abut the Springfield UGB and land inside the UGB that is designated, zoned and developed Heavy Industrial.
- Area is flat with some slopes along the banks of the Mill Race
- riparian resources and wetlands along the Mill Race and other waterways
- portions of study area are in the floodplain
- Highly sensitive Drinking Water Protection Overlay zone and immediately adjacent to SUB Willamette

Wellfield, Springfield's primary drinking water source.

- Soil classification predominantly Class II overall, with some Class III and IV.
- Lower priority for expansion under ORS 197.298.
- Not excluded due to its location immediately adjacent to existing industrial land inside the UGB, its proximity to existing truck routes, public transit, and rail facilities, and presence of a 57-acre tract (in SUB's ownership) and a 21.1 acre tract comprising developable land not outside of the flood plain.
- SUB Tract (57.2 acres) abuts SUB land inside the UGB, abuts Swanson Mill site (currently being re-built and upgraded after the 2014 fire), and has access easements through to F Street.[9]
    - 18030100 3700/18030100 502

- 18030100 501 abuts UGB is a 20-acre site, abuts UGB
- Smaller 5-10 ac sites in study area:
    - 18030100 1400/ 18030100 1300/ 18030100 1199
    - 18030100 1700
    - 18030100 1701/18030100 1702

- Access to the area to and from Interstate Highway 5 is via South 28th Street, classified as a Major Collector in the TSP; and South M and South 26th (Lane County road); and South F Street (via SUB access easement on Swanson property)— a Local Street in the TSP.
- Area was identified by the CIBL Technical and Stakeholder Advisory Committees as a potential employment area worthy of further study in the Preliminary CIBL Analysis (2008-2009), and was included in draft alternatives reviewed by the Joint Planning Commissions and Springfield City Council.

18030100 500

18030100 501

18030100 3700

18030100 502

18030100 1400

18030100 1300

18030100 1199

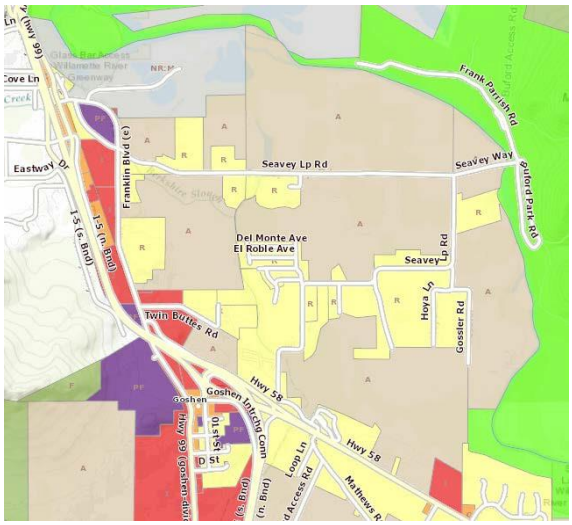
18030100 1700

[9] See 4-29-14 email from SUB General Manager Jeff Nelson to staff Pauly: "when SUB purchased the KR property, SUB made sure that emergency vehicles can access through KR's property via the Swanson easement (for all the area, not just the three parcels) to comply with the Fire Marshall's requirements for emergency vehicle access circulation." See letters from SUB General Manager Jeff Nelson, dated 9-10-13 and 5-1-14 to Springfield Mayor and Council regarding SUB's request to bring the tract purchased from Knife River into the UGB to be designated for employment uses; thus the City assumed this publicly-owned land is a candidate site for inclusion in the UGB to meet employment land needs.

18030100 1701

18030100 1702

Seavey Loop



- Designated Agriculture
- Soil capability class is mixed. Area comprises Class II, III, IV, and VI, soils.
- Soils predominantly Class II, and Class III and IV High Value and Prime (same priority as Cl II), lower priority for expansion
- Part of a larger block of high value agricultural land
- Tracts with Class VI soils are constrained by slopes and very restrictive BPA easements.
- North and Eastern portions of study area are entirely in the floodway.
- Hydric soils
- Area contains parcel larger than 20 acres, including a multiple-parcel tract of land owned by one family, but parcels comprise predominantly High Value Ag. soils, lower priority for expansion.

- 18031410 300: 62% High Value Ag.
- 18031410 1305: 74% High Value Ag
- 18021410 1400: 100% High Value Ag
- 18031100 1600: 100% High Value Ag
- 18031130 3900: 61% High Value Ag
- 18031410 306: 77% High Value Ag
- 18031410 307: 74% High Value Ag
- 18031410 305: 100% High Value Ag
- 18031100 1604: 81% High Value Ag

- 18031410 1401: 36% High Value Ag, higher priority for expansion, 5 ac.

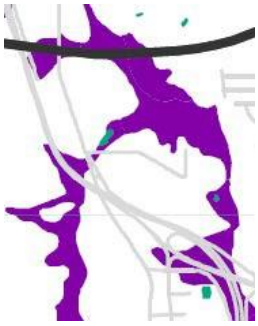
- NOTE: One EFU tract 18031440 501, 504 and 505 (20.1 ac.) is completely surrounded by exception land and I-5, and does not comprise predominantly high value ag soils, thus is considered second priority land. This tract is constrained by slopes and very restrictive BPA easements and was excluded from consideration.
- See additional description of this Study Area under Second Priority Exception Areas
- Area was identified by the CIBL Technical and Stakeholder Advisory Committees as a potential employment area worthy of further study in the Preliminary CIBL Analysis (2008-2009), and was included in draft alternatives reviewed by the Joint Planning Commissions and Springfield City Council.

18031410 300

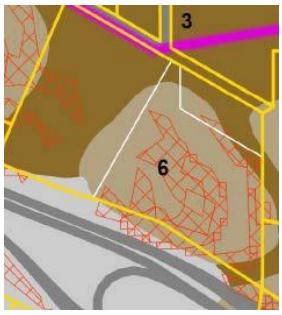
18031410 1305

18031410 306

18031410 1401

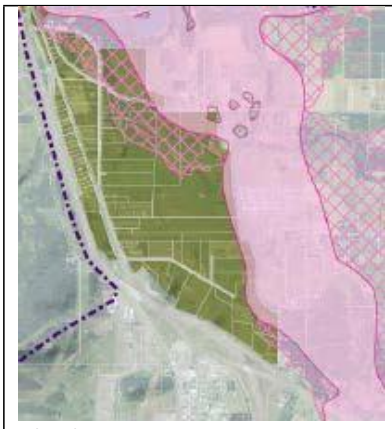

Hydric soils and NWI wetlands

18031440 501, 504 and 505
Slopes constraints and BPA easement[10]



Cl VI soils and slopes>15%

[10] It should be noted that the Alvey Substation located south of this area "is a high voltage substation hub for BPA's high voltage transmission network 115kV and above. It is not a distribution substation. Lines go out of BPA's substation that feed to local distribution substations that transform the voltage from 115kV to a lower distribution voltage." "If a large user were to locate in the College View area, they would not receive service directly from BPA's substation, however a new High Voltage to Low Voltage distribution network substation could be built." (email from Jeff Nelson to staff Pauly, SUB, 9-11-14)



Floodway extent

Clearwater

- Designated agriculture
- Potentially suitable parcels including parcels 10 and 20 acres and larger parcels that abut the Springfield UGB and land inside the UGB that is designated, zoned and developed Low Density Residential
- Area is flat with some slopes along the banks of the Middle Fork Willamette river
- Riparian resources and wetlands along the river and Mill Race and Gorrie Creek
- Portions of study area are in the floodplain; floodway along the river
- Sensitive Drinking Water Protection Overlay zone and near SUB's Willamette Wellfield, Springfield's primary drinking water source.
- Soil classifications are mixed, predominantly Class II overall, with some Class IV and VII.
- Public parkland in the vicinity
- Hydric soils
- Parcels comprising <50% High Value Ag soils
  - 18020800 100 (16.2 acres) 54% non high value (Cl. VIII, II VII)
  - 18020500 2801 (29 ac.)* 58% non high value (Cl VII, VI, II)

- 18020500 1928 (10 ac.)* 33% Cl VII, 34% Cl IV, 33% Cl II

- Parcels comprising more than 50% High Value Ag soils:
  - 18020500 2800 (39.5 ac.) 63% Cl II, low priority for expansion
  - 18020500 2600 (22 ac.)* 72% Cl II, low priority for expansion
  - 18020500 2202 (21 ac.)* 96% Cl II, low priority for expansion
  - 18020500 1900 (10.3 ac.)*80% Cl II, low priority for expansion
  - 18020500 1708 (5.8 ac.)* 66% Cl II, low priority for expansion
  - 18020500 1800 (36 ac.)* 63% Cl II, low priority for expansion
  - 18020600 4202 (21 ac.)* 73% Cl II, low priority for expansion

- 18020500 1909, 18020600 1001 are public land owned by Springfield School District
- Area was identified by the RLS and CIBL Technical and Stakeholder Advisory Committees as a potential future residential expansion area but not suitable for industrial and commercial development.

18020800 100

18020500 2801

18020500 1928

PRIORITIZE FOURTH PRIORITY AGRICULTURAL AND FOREST LANDS ON THE BASIS OF CAPABILITY CLASSIFICATION

ORS 197.298(2):

> *"Higher priority shall be given to land of lower capability as measured by the capability classification system or by cubic foot site class, whichever is appropriate for the current use."*

The City conducted an area-wide high level assessment of soil capability classification to determine and compare the capability classification system or by cubic foot site class of lands adjacent to the UGB that are designated for agriculture, forestry or both.

Table 14 above provides additional information to compare general soil classifications between the study area groupings and parcels within groupings.

SPRINGFIELD 2030 REFINEMENT PLAN: *Soil Capability and Constraints*

Analysis of Capability Classification in the Springfield UGB Study Area [ORS 197.298(2)]

This section of the report explains how the City addressed ORS 197.298 (1)(d) and (2) when the City identified the capability classifications of soils found in the potential urban growth areas surrounding Springfield's UGB, and when the City mapped the UGB study area to analyze fourth priority lands designated for agriculture and forestry in the Lane Rural Comprehensive Plan. As supported by ample evidence in the record documenting the City's iterative planning process beginning in 2008, the City's UGB location alternatives analysis examined capability classifications of all land surrounding the UGB in the initial, preliminary and final stages of the UGB study area alternatives analysis.

Methodology. The capability classifications mapping for the initial analysis included all land in the vicinity of the UGB, and extending several miles out to the north, east and south.[11] To compare and evaluate land under ORS 197.298 (1)(d) and (2), the City used the United States Department of Agriculture Natural Resources Conservation Service (NRCS) Lane County Soil Survey data to prepare maps of the lands adjacent to the UGB depicting soil classifications I through VIII. [12] These maps provided the factual base for conducting analysis to determine the location of prime agricultural soils and the geographic relationship of those soils to the existing UGB and potential UGB expansion areas.

In addition to providing a factual basis for the City's prioritization of lands designated for agriculture and/or forestry by capability classification, this section of the report provides evidence and findings to address the City's analysis under Goal 14, Boundary Location Factor 4 for comparing land groupings within the fourth priority under ORS 197.298; and to justify the City's ultimate choice of expansion areas under Goal 14, Boundary Location Factor 4 — balanced with the other Goal 14, Boundary Location Factors.

As stated on the USDA NRCS Soils website, a published soil survey is a detailed report on the soils of an area. The soil survey has maps with soil boundaries and photos, descriptions, and tables of soil properties and features. Soil surveys are used by farmers, real estate agents, land use planners, engineers and others who desire information about the soil resource.[13]

Land Capability Classification is defined in the NRCS Technical Reference NSSH Part 622.02:

a. *"Definition. Land capability classification is a system of grouping soils primarily on the basis of their capability to produce common cultivated crops and pasture plants without deteriorating over a long period of time.*

b. *Classes. Land capability classification is subdivided into capability class and capability subclass nationally. Some States also assign a capability unit.*

[11] Lands west of Interstate Highway 5 were assumed to be within the City of Eugene's jurisdictional area as described in the Metro Plan and were not included in Springfield's analysis.
[12] Map 4: Study Area Soil Class, City of Springfield, OR, ECONorthwest, December 2008
[13] USDA NRCS website http://www.nrcs.usda.gov/wps/portal/nrcs/detail/soils/survey/?cid=nrcs142p2_053375, accessed 12-15-15.

c. *Significance. Land capability classification has value as a grouping of soils. National Resource Inventory information, the Farmland Protection Policy Act, and many field office technical guides have been assembled according to these classes. The system has been adopted in many textbooks and has wide public acceptance. Some State legislation has used the system for various applications. Users should reference Agriculture Handbook No. 210 for a listing of assumptions and broad wording used to define the capability class and capability subclass.*

d. *Application. All map unit components, including miscellaneous areas, are assigned a capability class and subclass. Agriculture Handbook No. 210 provides general guidance, and individual State guides provide assignments of the class and subclass applicable to the State. Land capability units can be used to differentiate subclasses at the discretion of the State. Capability class and subclass are assigned to map unit components in the official soil survey database."*[14]

As stated in the National Soil Survey Handbook, Part 622 (00-Exhibit 1), USDA, NRCS: *"Capability units are soil groups within a subclass. The soils in a capability unit are enough alike to be suited to the same crops and pasture plants, to require similar management, and to have similar productivity. Capability units are generally designated by adding an Arabic numeral to the subclass symbol, for example, 2e-4 and 3e-6. The use of this category of the land capability classification is a state option. This category of the system is not stored in the NRCS soil survey database."*[15]

As stated in the Forward to the Agriculture Handbook No. 210 p. iii:

"Since soil surveys are based on all the characteristics of soils that influence their use and management, interpretations are needed for each of the many uses."[16]

and

"In using the capability classification, the reader must continually recall that it is an interpretation. Like other interpretations, it depends on the probable interactions between the kind of soil and the alternative systems of management. Our management systems are continually changing. Economic conditions change. Our knowledge grows. Land users are continually being offered new things, such as new machines, chemicals, and plant varieties."[17]

and

"The new technology applies unevenly to the various kinds of soil. Thus the grouping of any one kind of soil does not stay the same with changes in technology. That is, new combinations of practices increase the productivity of some soils more than others, so some are going up in scale whereas others are going down, relatively. Some of our most

---

[14] National Soil Survey Handbook, Part 622, USDA, NRCS http://www.nrcs.usda.gov/wps/portal/nrcs/detail/soils/ref/?cid=nrcs142p2_054226#ex6 accessed 12-16-15.

[15] National Soil Survey Handbook, Part 622 (00-Exhibit 1), USDA, NRCS, provided to staff by Eugene USDA/NRCS District Conservationist Tom Burnham, 12-16-15.

[16] Agriculture Handbook No. 210, Land Capability Classification, USDA Soil Conservation Service,
[17] Ibid.

productive soils of today were considered poorly suited to crops a few years ago. On the other hand, some other soils that were once regarded as good for cropping are now being used more productively for growing pulpwood. These facts in no way suggest that we should not make interpretations. In fact, they become increasingly important as technology grows. But these facts do mean that soils need to be reinterpreted and regrouped after significant changes in economic conditions and technology."[18]

and
"…other important interpretations are made of soil surveys. Examples include groupings of soils according to crop-yield predictions, woodland suitability, range potentiality, wildlife habitat, suitability for special crops, and engineering behavior. Many other kinds of special groupings are used to meet local needs."[19]

The City used NRCS SSURGO data to map soils and their capability classifications.[20] Staff contacted Cory Owens, UDSA NRCS State Soil Scientist[21] to confirm that the capability classifications I-VIII in the SSURGO data base are a component of the official soil survey database.

For more detailed study area and parcel-level analysis, the City applied the NRCS SSURGO map data to the City's maps of study areas.[22] The City also accessed NRCS soils data from the Regional Land Information Database (RLID) in Lane County and accessed soil map units on a parcel by using the Lane County Plan and Zone online Map viewer. Soils information in RLID is derived by overlay of Lane County regional GIS taxlot layer with soil units mapped by USDA Natural Resource Conservation Service (NRCS). In addition to the names and relative extents of the soil "map units" which occur on the taxlot, limited soil characteristics are displayed in RLID. For Lane County, the RLID data shows the name and number of the soil map unit and the percentage of each mapped soil unit on a parcel. In addition to GIS analysis of the NRCS data, the City utilized the parcel-based soils data in RLID in the boundary alternatives analysis. In RLID, the "Ag Class" value (formally known as Non-Irrigated Land Capability Class) represents the dominant capability class, under non-irrigated conditions, for each map unit, based on composition percentage of all components in the map unit. Land capability classification relates to the suitability of soils for most kinds of field crops. Capability classes are designated by the numbers I through VIII, which indicate progressively greater limitations and narrower choices for practical use:

Class I soils have few limitations that restrict their use.

Class II soils have moderate limitations that reduce the choice of plants or that require moderate conservation practices.

Class III soils have severe limitations that reduce the choice of plants or that require special conservation practices, or both.

[18] Ibid.
[19] Ibid.
[20] NRCS Lane County Soil Survey
[21] telephone communication between staff Pauly and NRCS staff Cory Owens, 12-17-15
[22] Email from staff Mike Engelmann to staff Pauly, 12-17-15

Class IV soils have very severe limitations that reduce the choice of plants or that require very careful management, or both.

Class V soils are subject to little or no erosion but have other limitations, impractical to remove, that restrict their use mainly to pasture, rangeland, forestland, or wildlife habitat.

Class VI soils have severe limitations that make them generally unsuitable for cultivation and that restrict their use mainly to pasture, rangeland, forestland, or wildlife habitat.

Class VII soils have very severe limitations that make them unsuitable for cultivation and that restrict their use mainly to grazing, forestland, or wildlife habitat.

Class VIII soils and miscellaneous areas have limitations that preclude commercial plant production and that restrict their use to recreational purposes, wildlife habitat, watershed, or esthetic purposes.

In RLID, the "Hydric" value indicates the percentage of each map unit that meets the definition of hydric soils. Map units are composed of one or more map unit components or soil types, each of which is rated as hydric soil or not hydric. Map units that are made up dominantly of hydric soils may have small areas of minor non-hydric components in higher positions on the landscape, and map units that are made up dominantly of non-hydric soils may have small areas of minor hydric components in lower positions on the landscape. Each map unit is rated based on its respective components and the percentage of each component within the map unit.

OAR 660-033-0030(2) states: *"When a jurisdiction determines the predominant soil capability classification of a lot or parcel it need only look to the land within the lot or parcel being inventoried."*

ORS 215.710 lists the soils to be considered high value farmland: land in a tract composed predominantly of soils that are irrigated and classified prime, unique, Class I or Class II; or non-irrigated and classified prime, unique, Class I or Class II. In addition, for lands in the Willamette Valley, tracts composed predominantly of certain Class III or IV soils listed in ORS 215.710(3)(a)-(d) and soils west of the Cascades listed in (4)(a)-(d) are considered high value.

OAR 660-033-0030 (8)(a) "High-Value Farmland" means land in a tract composed predominantly of soils that are:

> *(A) Irrigated and classified prime, unique, Class I or II; or*
>
> *(B) Not irrigated and classified prime, unique, Class I or II.*
>
> *(c) In addition to that land described in subsection (a) of this section, high-value farmland, if in the Willamette Valley, includes tracts composed predominantly of the*

following soils in Class III or IV or composed predominantly of a combination of the soils described in subsection (a) of this section and the following soils:

(A) Subclassification IIIe, specifically, Bellpine, Bornstedt, Burlington, Briedwell, Carlton, Cascade, Chehalem, Cornelius Variant, Cornelius and Kinton, Helvetia, Hillsboro, Hult, Jory, Kinton, Latourell, Laurelwood, Melbourne, Multnomah, Nekia, Powell, Price, Quatama, Salkum, Santiam, Saum, Sawtell, Silverton, Veneta, Willakenzie, Woodburn and Yamhill;

(D) Subclassification IVw, specifically, Awbrig, Bashaw, Courtney, Dayton, Natroy, Noti and Whiteson.

The UGB Preliminary Study Area contains fourth priority land tracts composed predominantly of soils that are identified in OAR 660-0233-0030(8)(a) as meeting the definition of comprising "High Value Farmland," including soils and combinations of Subclassification IIIe and IVw soils.

In addition to prioritizing lands on the basis of capability classification as required by ORS 197.298, the City is require to apply Goal 14 Factors 3 and 4 to compare and evaluate candidate agricultural lands for inclusion in the UGB. In addition to requesting input from agency staff, the public and property owners to conduct the evaluation of alternatives, city staff conducted a literature search of relevant literature on this topic from the Oregon Department of Agriculture to supplement this report. The Department's 2007 report "*Identification and Assessment of the Long-Term Commercial Viability of Metro Region Agricultural Lands", January 2007* [23]states:

"Analysis of site and situation is best understood as an examination of both the capability (ability of the land to produce an agricultural product) and the suitability (ability to conduct viable farm use) of any given tract of land to be utilized for farm use. The key factors employed to identify significant and intact agricultural lands are discussed below."

"Capability factors

The physical ability of land to produce an agricultural product is a key and dominant factor in any assessment. Quantity and quality of soils and water play a significant role in the viability of agricultural production."

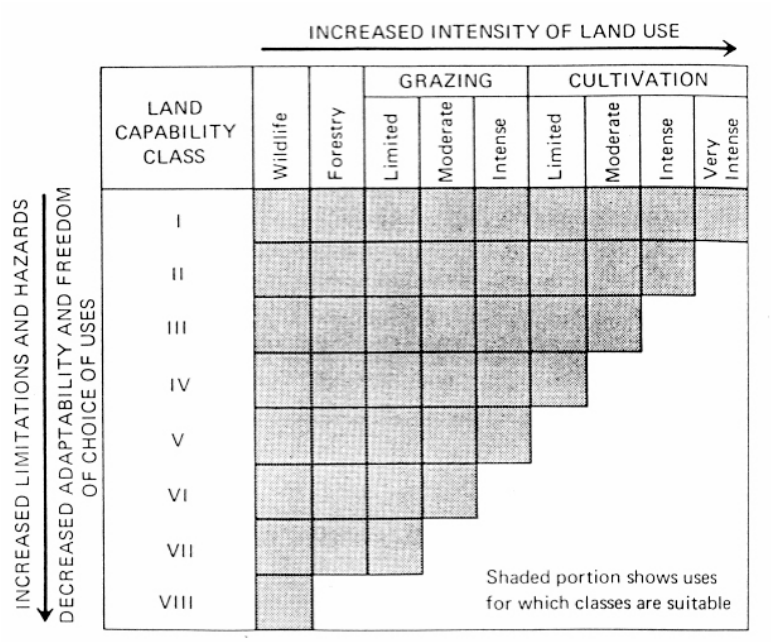
Soils: USDA NRCS agricultural capability class and importance (prime, unique, important farmlands). Because soils play a key role in the required Goal 14 analysis and Oregon land use issues, a more detailed discussion is provided below.

Soils surveys are based on all the characteristics of soils, including climate, that influence their use and management. Interpretations are provided within soil surveys for various land uses, including agriculture. Among these interpretations is the grouping of soils into

[23] Pages 13-14

agricultural capability classes. This classification system places soils in eight capability classes. The better the agricultural capability (decreasing from I-VIII), the less management (input) is required by the operator to produce a crop. Soil quality is also a key to the production options available to a grower.

The soils in the first four classes (I-IV), under typical/good management practices, are considered arable and are capable of producing adapted plants and common cultivated field crops and pasture plants. Some soils in classes V-VII are capable of producing specialized crops and even field and vegetable crops under special management."



"Soils can also be designated as prime, unique, or high-value farmland:

Prime Farmland is land that has the best combination of physical and chemical characteristics for producing food, feed, forage, fiber and oilseed crops. It must be available for these uses. It has the soil quality, growing season, and moisture supply needed to produce economically sustained high yields of crops when treated and managed according to acceptable farming methods, including water management. In general, prime farmlands have an adequate and dependable water supply from precipitation or irrigation, a favorable temperature and growing season, acceptable acidity or alkalinity, acceptable salt and sodium content, and few or no rocks. They are permeable to water and air. Prime farmlands are not exclusively erodible or saturated with water for a long period of time, and they either do not flood frequently or are protected from flooding."

"Unique farmland is land other than prime farmland that is used for the production of specific high value food and fiber crops. It has the special combination of soil quality, location, growing season and moisture supply needed to produce economically sustained

high quality and/or high yields of a specific crop when treated and managed according to acceptable farming methods. Some examples of crops are tree nuts, cranberries, wine grapes, and tree fruits."

"High Value Farmland is defined in ORS 215.710(1), (3) and (4) and OAR 660-033-0020(8)(a), (c), (d) and (e). "High Value Farmland" is land in a tract composed predominantly (50.1%) of certain specified soils commonly referred to as "High Value Farmland Soils." These soils (alone or in combination) are the following:

1. Those soils classified by the Natural Resource Conservation Service (NRCS) as:

a. Prime, Unique, Capability Class 1 or Capability Class 2 not irrigated; or

b. Prime, Unique, Capability Class 1 or Capability Class 2 if irrigated; and

2. Certain specifically listed Capability Class 3 and 4 soils for the:

a. Willamette Valley; and

b. Oregon Coast west of the summit of the Coast Range if used in conjunction with a dairy operation on January 1, 1993; and

"High-value farmland also includes other lands planted in specified perennials based on the 1993 Farm Service Agency air photos."

"Water: Availability of water for irrigation of agricultural crops and livestock watering. Water is key to the production of many high-value crops. However, many crops, including high-value crops, can be produced using dryland agricultural practices. Dryland production is most feasible where precipitation is adequate to allow economic return on a nonirrigated crop. New technologies in delivery and storage can compensate for limited availability."

"Water availability is both an asset and a threat to regional agricultural. Current availability is overall good throughout the region. Expansion in some areas, especially where groundwater is the major source, is severely limited by ground water limitations. Such limitations do not impair the use of existing water rights. It is especially important to recognize existing agricultural irrigation in groundwater restricted areas because new irrigation rights currently are difficult to obtain."

"*<u>Most of the suitability factors can be related to the position of farming operations as part of a large block of agricultural land or other resource lands</u>. <u>Protecting and maintaining large blocks of agricultural land is key to maintaining the integrity of working lands.</u> Integrity involves many issues including the ability to operate with limited conflicts, curtail speculative land values and maintain a critical mass of land sufficient to leverage the infrastructure needs of the industry.* (emphasis added)

- *Land use pattern: Adjacent and area land use pattern (nonfarm uses, exception areas). Includes analysis of edges that provide workable buffers between agricultural lands and nonfarm uses.*

- *Agricultural land use pattern within the subject agricultural area: The types of crops grown and the ability of farming operations/practices associated with the producing these crops to co-exist with other land uses in the area can be an important factor.*

- *Parcelization (number and size), tenure and ownership pattern: In analyzing suitability, parcelization is important, but not always as a stand-alone factor. All other factors being equal, smaller parcels under multiple ownerships are less favorable for long-term commercial farm use. The practice of renting or leasing smaller (and larger) parcels is very common in the region and needs to be taken into account. Long term, if the smaller parcels are protected for farm use, they frequently become available for rent, lease or acquisition for farm use, especially if they do not contain dwellings.*

- *Agriculture infrastructure: Elements such as transportation, irrigation delivery, labor availability, processing and other service needs, agricultural special districts, drainage facilities, etc., can be important factors in the long-term viability of an area. It is important to note that, unlike the infrastructure needs for new urban development, the agricultural infrastructure is in most cases already in place and has been and is being maintained and updated on an ongoing basis.*

- *Zoning, within subject agricultural area: Many lands currently employed in farm use within the Metro region are not zoned for exclusive farm use. The long-term suitability of such areas is impacted by the nonfarm uses that may be permitted and by the ability to further partition or subdivide the area.*

- *Location in relationship to adjacent lands zoned for nonresource development:*

- *The number, size and length of edges with urban and other nonfarm development impact the efficiency and effectiveness of agricultural practices and can impact land values.*

- *The scale, shape and size of protrusions of nonresource lands into agricultural lands also impact efficient and effective agricultural operations.*

- *Certain nonfarm uses are more compatible with agricultural operations than others.*

- *The ability to further partition or subdivide.*

- *Location/availability of edges and buffers that help insulate and protect agricultural operations from nearby nonfarm use.*

Other factors

- *Concentration/clusters of farms:*
- *The dependence between farms: ability for sharing of labor, housing, equipment and other needed services can be critical to the bottom line.*
- *The ability to leverage agriculture's infrastructure needs by maintaining economies of scale.*
- *A cluster of farms can also have marketing value. Customers like to make one trip to obtain berries, fruits, vegetables and other products in one area.*
- *Agri-tourism can also benefit from clusters. Examples include winery tours, marketing by the Tri County Farm Fresh Food Guide, and the Hood River Valley "Fruit Loop."*

"Trends in regional agriculture create different needs, opportunities and abilities for the industry. Consumer trends are increasingly dynamic and segmented, creating new markets; markets that are rapidly changing and demanding more specialty products. Specifically:

- *Global trade opportunities and concerns.*
- *Demand for organic, sustainable, high quality foods both in the home and at restaurants.*
- *Farmers markets, direct marketing opportunities, development of specialty and niche crops.*
- *"Agri-tourism*
- *Increasing demand for biofuels/energy development. Agricultural practices associated with the production of commodities used in the production of biofuels tend to be more extensive in nature, usually do not require irrigation and tend to require the use of larger machinery.*
- *Growing recognition of food security issues and demand for products from the local food shed.*
- *Federal Farm Bill. New conservation incentives and other programs related to renewable energy and farmland protection could help region farms cope.*

Location within and near a major metropolitan region can be a major asset in light of the trends outlined above. Many of the intensive, high-value, niche and specialty crops in increasing demand can be produced under circumstances not otherwise conducive to more recognized agricultural production in the region."[24]

[24] *Identification and Assessment of the Long-Term Commercial Viability of Metro Region Agricultural Lands,* Oregon Department of Agriculture, *2007*

The Department of Agriculture's inventory and analysis for Portland Metro identified varying intensities, scale and suitability situations within the region's agricultural lands. The study identified an agricultural lands hierarchy that recognized three levels of agricultural lands found in the Portland Metro region:

- ***"Foundation Agricultural Lands:*** *agricultural lands that provide the core support to the region's agricultural base. These lands anchor the region's larger agricultural base. They incubate and support the larger agricultural industry and are vital to its long-term viability. They have the attributes necessary to sustain current agricultural operations and to adapt to changing technologies and consumer demands."*
- ***"Important Agricultural Lands:*** *agricultural lands that are suited to agricultural production and contribute to or have the capacity to contribute to the commercial agricultural economy. These lands maintain the ability to remain viable over the long term. They have the potential to be Foundation Agricultural Lands, but tend to be not utilized to their full potential. Trends in regional agricultural could lead to a greater development of the agricultural capacity of these areas.*
- ***Conflicted Agricultural Lands*** *are agricultural lands whose agricultural capability (soils/water) is more times than not considered excellent but whose suitability is questionable primarily due to questions of integrity and ability to operate. These questions lead to issues of long-term viability. These lands are influenced by factors that diminish long-term certainty, which in turn tends to limit investment in agricultural operations by area farmers. These lands could become Important Agricultural Lands with changes in circumstances and trends in the industry. There may be individual or multiple operations within these areas that are conducting efficient, effective and viable operations."*[25]

The City's data base and methodology for identifying and evaluating soils for the purpose of ORS 197.298 and Goal 14 is reasonable and consistent with the law.

Evaluation results. The City's initial wide-ranging look at soil classifications in 2008 provided a "big picture" of where prime agricultural soils and important agricultural lands are located in relationship with Springfield's UGB and future growth needs. This assessment was confirmed through the City's multi-year Citizen Involvement process and input from local agricultural experts and practitioners. This is important and germane to the City's UGB study because Oregon law and the Oregon Department of Agriculture identify the importance of large blocks of agricultural land as an important factor in maintaining the state's agricultural land base:

ORS 215.243 (2)

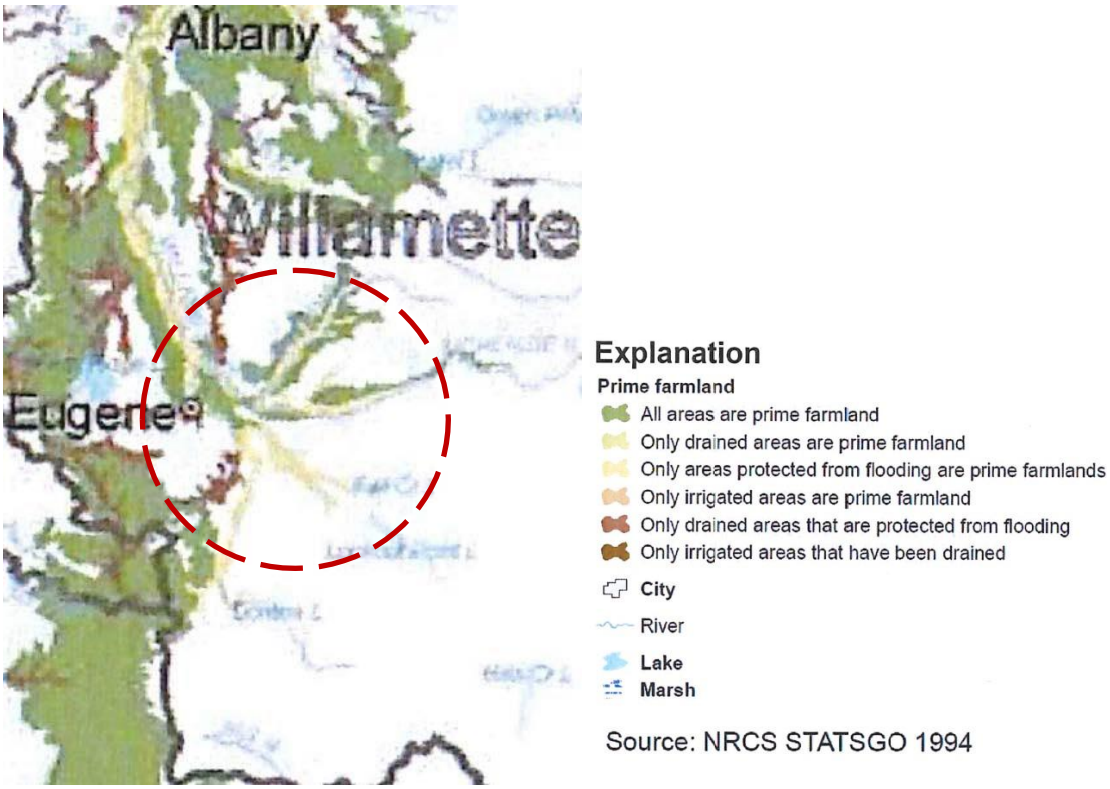
> *"The preservation of a maximum amount of the limited supply of agricultural land is necessary to the conservation of the state's economic resources and the preservation of such land in large blocks is necessary in maintaining the agricultural economy of the state and for the assurance of adequate, healthful and nutritious food for the people of this state and nation.* (emphasis added)

[25] Ibid

"Expansion of urban development into rural areas is a matter of public concern because of the unnecessary increases in costs of community services, conflicts between farm and urban activities and the loss of open space and natural beauty around urban centers occurring as the result of such expansion."

The average size of a farm in Lane County (2012) is 83 acres.[26]

An enlargement of the map "Prime Farmlands in Oregon" of the vicinity of the Springfield UGB Vicinity[27] illustrates the general location of large blocks of prime farmland in relationship to the Springfield/Eugene metro area:



[26] USDA Census of Agriculture 2012, County Profile, Lane County, Oregon, http://www.agcensus.usda.gov/Publications/2012/Online_Resources/County_Profiles/Oregon/cp41039.pdf accessed 12-16-15.

[27] *Integrated Water Resources Strategy, Map Gallery,* Oregon Water Resources Dept., 2010, p. 6.

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As clearly shown in Map 2: Alternatives Analysis Soils and Constraints (derived from NRCS SSURGO data)—in which the darkest brown colors on the map indicate locations of Class I (soils with few limitations that restrict their use) and Class II (soils with moderate limitations that reduce the choice of plants or that require moderate conservation practices)— the largest blocks of predominantly Class I and II soils outside of the Springfield UGB are located:

- south of the Willamette River, south of the Springfield UGB and east of Interstate Highway 5 (Seavey Loop area);
- southeast of the UGB, between the Willamette River and Pudding Creek, north of Highway 58 (Jasper Bridge area), and extending farther south to the Pleasant Hill area.

The City identified two prime farmland areas consisting of the largest blocks of predominantly Class I and II soils outside of the Springfield UGB when it prioritized and evaluated lands based on capability classification, and when it considered and compared potential UGB expansion areas that would avoid or reduce impacts to those two prime farmland areas.

It should be noted here that both of these prime farm soil areas are located in the immediate vicinity of second priority exception areas, thus the City was required under ORS 197.298 to consider second priority Seavey Loop and Jasper Bridge areas as candidate lands for urbanization regardless of this fact. The City's analysis provided explanation of why the Seavey Loop/College View study area and Jasper Bridge exception parcels were eliminated from consideration for employment land due to lack of suitable parcel sizes and physical constraints that preclude the ability to provide public facilities and services within the planning period. It should also be noted that the City received large volumes of comments from the public expressing concerns about and preferences for the importance of maintaining the Seavey Loop agricultural area for agriculture.

Other Class I and II soil areas, both in the vicinity of the UGB, and several miles out from the UGB are in smaller blocks or are more mixed.

- Generally, the northern edge of the existing Springfield UGB follows the McKenzie River and its flood plain. Lands outside of and adjacent to the UGB and on the Springfield side of the McKenzie River are predominantly Class II soils, interspersed with Class VII channels and smaller amounts of Class IV soils.

- Generally, the southern portion of the existing Springfield UGB between the UGB and the Willamette River comprises lands consisting primarily of Class II soils, interspersed with Class VII channels and smaller amounts of Class IV soils.

- Generally, the southeast portion of the existing Springfield UGB follows the ridgeline of the Thurston South Hills ("South Hills" Study Area grouping). The Thurston South Hills lands outside of and adjacent to the UGB are predominantly a mix of Class VI, IV, and VII soils.

- Generally, lands located farther south of the UGB, south of the Willamette River and its side channels comprise the largest blocks of Class I and II soils.

To conduct the soils analysis, the City identified general geographic groupings of all land areas in the vicinity of the UGB and named the areas for ease of reference, mapping and communication purposes. The City did not arbitrarily delineate UGB study areas for the purpose of conducting a quantitative analysis. Instead, the City reviewed NRCS Lane County Soil Survey soils series maps, sorted soil series into Classes I through VIII and conducted a visual qualitative assessment to determine the presence and general location of high value agricultural soils in the vicinity of the Springfield UGB.

For the purpose of prioritizing agriculture or forest land by capability classification, the City conducted a general visual assessment of mapped capability class to begin to sort lands in the order of highest capability classification as shown in Map 4: Study Area Soil Class, City of Springfield, OR, ECONorthwest, December 2008. This assessment includes all land, including the second and third priority lands previously discussed. It addresses mapped capability classification only and does not apply or address interplay of constraints such as slopes, rivers, floodway, existing development, etc. [28]

The soils in the vicinity of the Springfield UGB are located generally as follows:

Class I Soils

Within the preliminary Springfield UGB Study area adjacent to the UGB, Class I soils are found in the following areas:

- McKenzie View
- Mohawk
- Oxbow/Camp Creek
- Hayden Bridge
- Far East Springfield
- North Springfield Highway
- Thurston
- Jasper Bridge
- Seavey Loop[29]

As shown in Map 4, the largest contiguous areas of Class I soil within the preliminary Springfield UGB Study area are Jasper Bridge and Mohawk.

The City's UGB employment land expansion does not include areas comprised of Class I soils.

Class II Soils

Within the preliminary Springfield UGB Study area, Class II soils are found in the following areas:

[28] The City prepared a map Soil Capability and Constraints, depicting soil capability classes and absolute development constraints, March 2016.

[29] In a meeting with staff Pauly, Ross Penhallegon OSU extension service, stated that the best farmland in the City's study area is "right along Seavey Loop", and described this area as "very prime farm land" and "#1 place for close-in agriculture." See also email from R. Penhallegon to L. Pauly dated Feb. 27, 2015.

- North Gateway
- McKenzie View
- Hayden Bridge
- Mohawk
- Oxbow/Camp Creek
- North Springfield Highway
- Thurston
- Far East Springfield
- South Hills
- Wallace Creek
- Jasper Bridge
- West Jasper/Mahogany
- Clearwater
- Mill Race
- Seavey Loop
- Far East Springfield
- Jasper Bridge
- Mahogany
- Clearwater
- Oxbow/Camp Creek

Each Preliminary study area grouping comprises at least some Class II soils. The largest contiguous areas of Class II soil within the preliminary Springfield UGB Study area are Jasper Bridge, Seavey Loop and Oxbow/Camp Creek. The study area with the smallest size mapped Class II areas are South Hills and Wallace Creek.

The City's UGB employment land expansion includes Class II soils in the North Gateway and Mill Race areas.

Class III Soils

Within the preliminary Springfield UGB Study area, Class III soils are found in the following areas:

- McKenzie View
- Mohawk
- Hayden Bridge
- Oxbow/Camp Creek
- North Springfield Highway
- Far East Springfield
- South Hills
- Wallace Creek

- Jasper Bridge
- Mill Race
- Seavey Loop

Each Preliminary study area grouping except North Gateway, Thurston, West Jasper/Mahogany and Clearwater comprise at least some Class III soils. The largest contiguous areas of Class III soils are in Oxbow/Camp Creek.

The UGB Preliminary Study Area contains soils that are identified in OAR 660-0233-0030(8)(a) as meeting the definition of comprising "High Value Farmland," including soils and combinations of Subclassification IIIe and IVw soils. *Subclassification IIIe, specifically, Bellpine, Bornstedt, Burlington, Briedwell, Carlton, Cascade, Chehalem, Cornelius Variant, Cornelius and Kinton, Helvetia, Hillsboro, Hult, Jory, Kinton, Latourell, Laurelwood, Melbourne, Multnomah, Nekia, Powell, Price, Quatama, Salkum, Santiam, Saum, Sawtell, Silverton, Veneta, Willakenzie, Woodburn and Yamhill;*

(D) Subclassification IVw, specifically, Awbrig, Bashaw, Courtney, Dayton, Natroy, Noti and Whiteson.

Underlined soils are present in UGB Preliminary Study Area.

The City's UGB employment land expansion includes Class III soils in the Mill Race area.

Class IV Soils

Within the preliminary Springfield UGB Study area adjacent to the UGB, Class IV soils are found in the following areas:

- North Gateway
- McKenzie View
- Mohawk
- Oxbow/Camp Creek
- North Springfield Highway
- Thurston
- Far East Springfield
- South Hills
- Wallace Creek
- Jasper Bridge
- Jasper Bridge
- West Jasper/Mahogany
- Clearwater
- Mill Race
- Seavey Loop

Each Preliminary study area grouping comprises at least some Class IV soils. The largest contiguous areas of Class IV soil in the vicinity of Springfield's UGB are South Hills (Forest land) and Mohawk (agricultural land). Class IV soil are also located between the McKenzie Highway and South Hills in the Far East Springfield area.

The UGB Preliminary Study Area contains soils that are identified in OAR 660-0233-0030(8)(a) as meeting the definition of comprising "High Value Farmland," including soils and combinations of Subclassification IIIe and IVw soils. *Subclassification IIIe, specifically, Bellpine, Bornstedt, Burlington, Briedwell, Carlton, Cascade, Chehalem, Cornelius Variant, Cornelius and Kinton, Helvetia, Hillsboro, Hult, Jory, Kinton, Latourell, Laurelwood, Melbourne, Multnomah, Nekia, Powell, Price, Quatama, Salkum, Santiam, Saum, Sawtell, Silverton, Veneta, Willakenzie, Woodburn and Yamhill;*

(D) Subclassification IVw, specifically, Awbrig, Bashaw, Courtney, Dayton, Natroy, Noti and Whiteson.

The City's UGB employment land expansion includes Class IV soils in the North Gateway and Mill Race areas.

Class V Soils

No Class V soils are found within the Springfield UGB study area adjacent to the UGB.

Class VI Soils

Within the preliminary Springfield UGB Study area adjacent to the UGB, Class VI soils are found in the following areas:

- McKenzie View
- Mohawk
- Oxbow/Camp Creek
- Far East
- South Hills
- Wallace Creek
- Seavey Loop

The largest contiguous areas of Class IV soil in the vicinity of Springfield's UGB are McKenzie View, Mohawk, Camp Creek and South Hills

Class VI soils in the McKenzie View/Coburg Hills area are steep slopes with numerous landslide areas mapped in DOGAMI SLIDO.

Class VI soils in the Mohawk Valley area (east side of valley) include numerous areas are mapped in DOGAMI SLIDO as landslide talus/colluvium, and fans.

The City's UGB employment land expansion does not include Class VI soils.

Class VII Soils

Within the preliminary Springfield UGB Study area adjacent to the UGB, Class VII soils are found in the following areas:

- North Gateway
- McKenzie View
- Oxbow/Camp Creek
- North Springfield Highway
- Thurston
- Far East
- South Hills
- Wallace Creek
- West Jasper/Mahogany
- Clearwater
- Seavey Loop

The City's UGB expansion includes Class VII soils.

Class VIII Soils

Within the preliminary Springfield UGB Study area adjacent to the UGB, Class VIII soils are found in the following areas:

- North Gateway
- McKenzie View
- Oxbow/Camp Creek
- North Springfield Highway
- Far East
- South Hills
- West Jasper/Mahogany
- Clearwater
- Mill Race
- Seavey Loop

This classification includes W Water, 114 Riverwash, 110 Pits, 127C Urban land-Hazelair-Dixonville

The City's UGB expansion includes Class VIII soils in the North Gateway (Natural Resource designation) and Mill Race (Public/Semi-Public designation) areas.

<u>UGB Study Area Soils Summary:</u>

In the vicinity of the Springfield UGB, the City concluded that largest contiguous areas of Class I and II high value farmland soils are located:[30]

- Farmland east of Mt. Pisgah and west of Jasper Road
- Seavey Loop area east of Mt. Pisgah and along Highway 58

Generally speaking, in the Springfield area Class VIII, VII and VI soils are located in the hills and along the McKenzie and Willamette river channels, sloughs and floodways and generally are not suitable for developing urban industrial and office employment centers. No Class V soils are present in the area.

The City's analysis evaluated agriculture and forest-designated land with Class VIII, VII, VI, (no class V), IV, III, II and I capability classifications to identify potential candidate expansion areas.

The City's analysis properly assigned higher priority to land of lower capability as measured by the NRCS capability classification system when it evaluated and selected potential candidate UGB expansion areas, consistent with ORS 197.298 (1) and (2). [31]

Table 15: Evaluation of Potentially Suitable Fourth Priority Land

Map and Tax Lot	Capability Class %	Soil Map Units/Slopes	Suitable employment site for inclusion in UGB?
North Gateway Site (Note Class II land north of Sprague was excluded)			
1703154000 400 (102 ac.)* High value farmland comprises 45% of tract	45% Cl II 35% Cl VII 15% Cl IV 6% Cl VIII Hydric soils	95 Newberg 48 Fluvents 22 Camas 114 Riverwash Flat topo	**YES** Proximity Topo Public Facilities ESEE
170310000 2500 (68.3 ac.)* High value farmland comprises 44% of tract	46% Cl II 34% Cl IV 16% Cl VII 4% Cl VIII Hydric soils	96 Newberg 22 Camas 48 Fluvents 114 Riverwash Flat topo	**YES** Proximity Topo Public Facilities ESEE
170310000 2400 (22.8 ac.)* High value farmland comprises 89% of portion of tract east of I-5 (area west of I-5 is excluded from this study)	89% Cl II 4% Cl VII 7% Cl VIII Hydric soils	Flat site 96 Newberg 22 Camas, 114 Riverwash	**YES** Proximity Topo Public Facilities ESEE
McKenzie View Site (Note Class I and II land was excluded)			
17021800 402 17021800 403 17021800 404	VI	108C- Philomath 3-12% slopes	**NO** Public Facilities Slopes Proximity Landslide hazard ESEE

[30] Map 4: Study Area Soil Class, City of Springfield, OR, ECONorthwest, December 2008
[31] The City's record includes descriptions of the applicable soil series from the NRCS Soil Survey of Lane County.

Oxbow/Camp Creek (Note Class I and II land was excluded)			
17022200 200 17022200 103 17022300 300 approx. 6.8 acres are Class III, slopes 15% or less	III	105A – Pengra 1-4% slopes, 113E 102C 108C – Philomath	**NO** Public Facilities Proximity Landslide hazard BPA easement ESEE
17022300 700, 703, 704	III (high value farmland)	11C Bellpine 3-12% (high value farmland)	**NO** Soil Capability Slopes Proximity Public Facilities ESEE
Far East (South) (Note Class I and II lands and lands north of Hwy 126 were excluded)			
1702364000 200 1702364000 100 1701310000 603 1701310000 600 1701310000 500 43E	III	52D Hazelaire 7-20% slopes 43E Dixonville-Philomath-Hazelaire Complex, 12-35% slopes	**NO** Slopes Landslide hazard ESEE
West Jasper/Mahogany (Note Class II land was excluded)			
18020900 301 (8.4 acres)* 18020900 200 (62.4 acres)*	64% Cl VII, 17% Cl III, 10% Cl VIII water, 9% Cl II 53% cl VII and VIII, 44% cl II	95 Newberg 48 Fluvents 52B Hazelaire 2-7 % slopes hydric soils	**NO** Proximity Public Facilities ESEE
18020400 3000 (54.5 acres)*	75% Cl VII, 25% Cl II	48 Fluvents 95 Newberg 73 Linslaw 121B Salkum, 2-8% slopes hydric soils	**NO** Proximity Public Facilities ESEE
1802090000 203 (22.7 acres)*	86% water and fluvents Cl VIII, VII, 2% Cl II	48 Fluvents 52B Hazelair 2-7 % slopes 73 Linslaw 95 Newberg hydric soils	**NO** Proximity Public Facilities ESEE
18020400 2401 (6.1 acres)*	54% non farm, 46% Cl VII, II, IV	95 Newberg 48 Fluvent 52B Hazelaire 2-7 % hydric soils	**NO** Proximity Public Facilities ESEE
Clearwater			
18020500 2800 (39.5 ac.)*	63% Cl II 23% Cl VII 14% Cl IV	95 & 96 Newberg 48 Fluvents 22 Camas	**NO** Capability Classification Proximity Public Facilities

			ESEE
18020500 2600 (22 ac.)*	72% Cl II 14% Cl IV 14% Cl VII	95 & 96 Newberg 22 Camas 48 Fluvents	**NO** Capability Classification Proximity Public Facilities ESEE
18020800 100 (16.2 ac.)*	46% Cl II 40% Cl VIII 14% Cl VII	95 Newberg 110 Pits 48 Fluvents	**NO** Proximity Public Facilities ESEE
18020500 1928 (10 ac.)*	34% Cl IV 33% Cl VII 33% Cl II	22 Camas 48 Fluvents 95 Newberg	**NO** Proximity Public Facilities ESEE
18020500 2801 (29 ac.)*	56% Cl VII 3% Cl VI 36% Cl II	48 Fluvents 113E Rittner 12-30% slopes 96 Newberg, Salkum 2-8% slopes	**NO** Proximity Public Facilities ESEE
Wallace Creek			
1802140000 900 (17 ac)*	51% Cl VI	102C Panther 2-12% slopes 11D Bellpine 12-20% slopes 52B Hazelair 2-7% slopes hydric soils	**NO** Slopes Proximity Public Facilities ESEE
18021400 800 (8.3 ac)*	66% Cl III 28% Cl VI 6% Cl II	52B Hazelair 2-7 % slopes 102C Panther 2-12% slopes 78 McAlpin hydric soils	**NO** Slopes Proximity Public Facilities ESEE
1802140000 903 (7 ac.)* 1802140000 902 (4.8 ac.)*	89% Cl III 11% 94% Cl III	130 Waldo 102C Panther 2-12% slopes hydric soils	**NO** Slopes Proximity Public Facilities ESEE
1802140000 500 (20.8 ac.)*	46% Cl III 28% Cl VI 14% Cl IV 11% Cl II 1% Cl VI	130 Waldo 108C Philomath, 3-12% 52D Hazelair, 14% 78 McAlpin 102C Panther 2-12% slopes hydric soils	**NO** Slopes Proximity Public Facilities ESEE
1802140000 1303 (19 ac.)*	77% Cl VI 22% Cl III	108C Philomath, 3-12% 130 Waldo/Hazelair/Dupee hydric soils	**NO** Proximity Public Facilities ESEE
Mill Race			
SUB Tract 18030100 3700 (SUB)(36.7 ac.)* 18030100 502 (SUB) (20.5 ac.)*	95% Cl II 3 % Cl III HV 85% Cl II 13% Cl III	26 Chehalis, 29 Cloquato, 95& 96 Newberg, 79 McBee (Prime) 96 Newberg, 79 McBee (Prime), 29 Cloquato, 26	**YES** Proximity Topo Public Facilities ESEE

	1% Cl VIII water	Chehalis, W water	**YES** Proximity Topo Public Facilities ESEE
18030100 501 (22.1 ac.)*	99% Cl II 1% Water	96 Newberg	**YES** Proximity Topo Public Facilities ESEE
18030100 1400 (9.9 ac.)* 18030100 1300 (8.32 ac.)* 18030100 1199 (3.4 ac.)*	100% High value ag: 63% Cl II, 36% Cl III McBee (HV) 100% High value ag: 44% Cl II, 56% Cl III McBee (HV) 100% High value ag: 82% Cl II, 17% Cl III McBee (HV)	29 Cloquato 79 McBee 96 Newberg 29 Cloquato 79 McBee 96 Newberg 26 Chehalis 26 Chehalis 95 Newberg 79 McBee	**YES** Proximity Topo Public Facilities ESEE
18030100 1700 (10 ac.)*	56% Cl II 44% Cl III	95 & 96 Newberg, 29 Cloquato, 22 Camas	**YES** Proximity Topo Public Facilities ESEE
18030100 1701(5 ac.)* 18030100 1702(5.3 ac.)*	100% Cl II 77% Cl II 34% Cl IV	96 Newberg, 29 Cloquato 95 & 96 Newberg, 29 Cloquato 22 Camas	**YES** Proximity Topo Public Facilities ESEE
Seavey Loop			
18031410 300 (36 ac.)* 18031410 1305 (15.6 ac.)* 18021410 1400 (5 ac.)*	62% High Value Ag: 42% Cl II 9% Cl III Prime 28% Cl III 11% Cl IV High Value 11% Cl VI 74% High Value Ag: 72% Cl IV High Value 1% Cl III 1% Cl II 24% Cl VI 100% High Value Ag:	78 McAlpin, 26 Chehalis 79 McBee[32] 130 Waldo 85 Natroy[33] 43C Dixonville-Philomath-Hazelair complex 85 Natroy 79 McBee 78 McAlpin 43C Dixonville-Philomath-Hazelair complex 85 Natroy	**NO** Soil Capability Public Facilities Proximity ESEE

[32] McBee is listed in the NRCS Soil Survey of Lane County as prime farmland soil.
[33] Natroy in the Willamette Valley is identified as high value farmland in ORS 215.710

18031100 1600 (3.8 ac.)* 18031130 3900 (3.1 ac)*	100% Cl IV High Value 100% High Value Ag: 71% Cl II 30% Cl II High Value 61% High Value Ag: 61% Cl III Prime 38% Cl IV	26 Chehalis 79 McBee 79 McBee 43C Dixonville-Philomath-Hazelair complex Hydric soils	
18031410 306 (20 ac.)*	77% High Value Ag: 40% Cl II 14% Cl III Prime 23% Cl IV High Value 15% Cl IV 9% Cl VI	118 Salem, 26 Chehalis 79 McBee 85 Natroy 43C Dixonville-Philomath-Hazelair complex 12-35% slopes 43C Dixonville-Philomath-Hazelair complex 3-12% slopes 102 C Panther	**NO** Soil Capability Public Facilities Proximity ESEE

* absolute development constraints are not deducted from parcel acreage in this table

EXCLUDE HIGHER PRIORITY FOURTH PRIORITY AGRICULTURAL LANDS ON THE BASIS OF CAPABILITY CLASSIFICATION

In the next step in the process, the City excluded fourth priority lands on the basis of the capability classification system or by cubic foot site class of lands adjacent to the UGB.

<u>Class I capability lands excluded.</u>
The City excluded all the lands within the preliminary Springfield UGB Study area with Class I capability from further consideration:

- McKenzie View
- Mohawk
- Oxbow/Camp Creek
- Hayden Bridge
- Thurston
- Far East Springfield
- North Springfield Highway
- Jasper Bridge

- Seavey Loop[34]

The City excluded the largest contiguous areas of Class I soil within the preliminary Springfield UGB Study area: Jasper Bridge and Mohawk.

The City's UGB employment land expansion does not include areas comprised of Class I soils.

Class II capability lands excluded.

Most of the preliminary study area groupings comprise at least some Class II soils. With the exception of the South Hills and Wallace Creek, the preliminary study areas adjacent to the UGB comprise Class II soils. To provide unconstrained, suitably sloped, and serviceable land for industrial and commercial mixed use office employment in an efficient growth pattern in accord with all applicable statutes, administrative rules and comprehensive plan policies, the City determined it would need to include some Class II soils in the UGB expansion. Thus the City could not exclude all lands with Class II soils at this point in the analysis. Thus the City sought to limit and lessen the impacts of such an expansion on farmland by avoiding the largest areas of Class II soils and other High Value Farmland as defined in ORS 215.710 and OAR 660-033-0030(8)(a) when it selected candidate fourth priority parcels for expansion. By expanding on land with more mixed soils, the City's expansion has less overall impact on large blocks of prime soils and prime farmland in the vicinity of the UGB and less overall impact on the viability of larger agricultural areas in the vicinity of the UGB.[35] The City's reasoning to fully meet the intent of ORS 197.298 and the Goal 14 Factors 1-4 is consistent with the law.

The City's analysis identified and compared the proportion of Class II and other High Value and Prime Farmland soils on potentially suitable candidate parcels when the City determined which parcels comprise predominantly High Value soils; when the City relied on that data to determine prioritization of fourth priority lands under ORS 197.298; and when the City applied Goal 14 Factors 1-4 to candidate fourth priority lands.

The largest contiguous areas of Class II soil within the preliminary Springfield UGB Study area are Jasper Bridge, Seavey Loop and Oxbow/Camp Creek areas. The City determined that those study areas have lower priority for inclusion if found to be suitable to meet the identified land need.

The North Gateway site north of Sprague Road comprises predominantly Class II soils. The City excluded that area from consideration:

[34] In a meeting with staff Pauly on 1-13-13, Ross Penhallegon OSU extension service, stated that the best farmland in the City's study area is "right along Seavey Loop", and described this area as "very prime farm land" and "#1 place for close-in agriculture." See also email from R. Penhallegon to L. Pauly dated Feb. 27, 2015.

[35] For example, *Agronomic Suitability Analysis of Wicklund Trust Property,* Northwest Consulting, Jan. 27, 2009, pp. 2-4 describes the perceived effect of adjacent urbanization on the economic viability of farm operations and the unknown effect on adjacent farmland if subject property were to be removed from production. See also attached corroborating letter from Chad Egge, farmer of subject property 2005-2009.

Class II area excluded

The City excluded all Class II areas in McKenzie View. These Class II sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City excluded all Class II areas in Oxbow/Camp Creek. These Class II sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City excluded all Class II areas in Far East and all adjacent agricultural lands north of Highway 126. These Class II sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City excluded all Class II areas in West Jasper/Mahogany. These Class II sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City excluded all Class II areas in Clearwater. These Class II sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City excluded all Class II areas in Wallace Creek. These Class II sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City excluded all Class II areas in Seavey Loop. These Class II sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City's UGB expansion includes lands predominantly Class II in Mill Race. The City identified suitable parcels comprising Class II soils in Table 15.

The City's UGB expansion includes Class II soils within mixed soil areas in North Gateway. The City identified suitable parcels comprising Class II soils in Table 15.

<u>Class III capability lands excluded.</u>

Each Preliminary study area grouping except North Gateway, Thurston, West Jasper/Mahogany and Clearwater comprises at least some Class III soils. Some Class III soils are considered High Value and Prime Farmland within the Willamette Valley.

The largest contiguous areas of Class III soils are in Oxbow/Camp Creek. The City excluded Class III (Bellpine) High Value Farmland areas in Oxbow/Camp Creek. Class III sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City excluded Class III (McBee) Prime Farmland areas in Seavey Loop that are mixed with Class II High Value and Class IV Prime Farmland soils. These Class III sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

The City's UGB expansion includes Class III soils in Mill Race that are mixed with Class II and Class IV.

Class IV capability lands excluded.

The City excluded Class IV (Natroy) High Value Farmland areas in Seavey Loop that are mixed with Class II and Class III High Value Farmland soils. These Class IV sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

Class VI soils excluded.

The City's UGB expansion does not includes Class VI soils. The City evaluated the potentially suitable lands comprising Class VI soils and ultimately rejected those sites from consideration. These Class VI sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

Class VII soils are higher priority for expansion.

The City's UGB expansion includes Class VII soils in North Gateway and Mill Race.

The City evaluated the potentially suitable lands comprising Class VII soils and ultimately rejected those sites from consideration. These Class VII sites were also excluded on the basis of physical public facilities constraints, proximity and Goal 14 factors 3 and 4.

Class VIII soils are higher priority for expansion.

The City's UGB expansion includes Class VIII soils in North Gateway and Mill Race.

The City evaluated the potentially suitable lands comprising Class VIII soils and ultimately rejected those sites from consideration. It should be noted that the Class VIII capability classification in Lane County includes Water. These Class VIII sites were also excluded on the basis of public facilities constraints, proximity and Goal 14 factors 3 and 4.

Table 16: Fourth Priority Agriculture and Forest Land Excluded on the Basis of Predominant Capability Classification				
North Gateway (North of Sprague) Class II	McKenzie Class I and II	View	Oxbow/Camp Class I, II and III High Value	Creek
Hayden Bridge	Mohawk		North Springfield Highway	
Far East (North of Hwy 126)	South Hills Class III High Value		West Jasper/Mahogany Class II	
Wallace Creek	Jasper	Bridge		
Seavey Loop Area 1	Thurston		Clearwater	

Areas designated Agriculture are shown in beige color. Areas designated Forest are shown in green color. Areas with both designations are shown with both colors.

EXCLUDE FOURTH PRIORITY LANDS LACKING THE SPECIFIED CHARACTERISTICS TO MEET THE IDENTIFIED EMPLOYMENT LAND NEED

OAR 660-024-0060(1)(d):

"Notwithstanding subsection (a) to (c) of this section, a local government may consider land of lower priority as specified in ORS 197.298(3). "

ORS 197.298(3)

"Land of lower priority under subsection (1) of this section may be included in an urban growth boundary if land of higher priority is found to be inadequate to accommodate the amount of land estimated in subsection (1) of this section for one or more of the following reasons:

(a) Specific types of identified land needs cannot be reasonably accommodated on higher priority lands; (emphasis added)

(b) Future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints; (emphasis added)

or

(c) Maximum efficiency of land uses within a proposed urban growth boundary requires inclusion of lower priority lands in order to include or to provide services to higher priority lands."

As explained above, the City excluded fourth priority lands on the basis of 1) soil capability classification; and 2) specific types of land needs. As previously explained above and in the CIBL/EOA, the City screened each study area grouping to identify lands with slopes 15% or less and comprising at least 5

acres without absolute development constraints that make lands unbuildable for industrial or commercial employment uses. In this step, the City's methodology excluded lands of higher priority capability classification because those lands are encumbered by absolute development constraints to the extent that the City's specific types of identified cannot be reasonably accommodated [ORS 197.298 (3)(a)]. This report and the local record provide adequate evidence of the thorough and painstaking process conducted by City staff to screen candidate lands adjacent to the UGB to evaluate alternative locations. The City's methodology and reasoning for excluding lands of lower priority capability classification is appropriate and consistent with the law.

Exclude higher priority lands where specific types of identified land needs cannot be reasonably accommodated [ORS 197.298(3)(a)] and/or where future urban services could not reasonably be provided to the higher priority lands due to topographical or other physical constraints [ORS 197.298(3)(b)]

In the next step, the City excluded the fourth priority lands that are *not* potentially suitable to provide sites with the needed site characteristics to satisfy the identified employment land need deficiency.

OAR 660-024-0060 (1)(e) states:

> *"For purposes of this rule, the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under section (5) of this rule, as well as other provisions of law applicable in determining whether land is buildable or suitable."*[emphasis added]

OAR660-024-0060(5)

> *"If a local government has specified characteristics such as parcel size, topography, or proximity that are necessary for land to be suitable for an identified need, the local government may limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298."* [emphasis added]

Identification of Potentially Suitable and Serviceable Land

At this stage in the analysis, the city had identified lands of suitable parcel sizes (at least 5 acres of unconstrained land - free of absolute development constraints. These candidate sites were then evaluated to determine whether topographic or other physical constraints preclude reasonable service provision and consideration of site location and other physical characteristics of needed sites to accommodate target industry employment types identified in the CIBL/EOA. The City's Public Services Analysis compared relative physical distance to the public facilities and services needed to serve

industrial and office commercial employment land uses, including the target industries identified in the CIBL/EOA.

As previously explained in the City's findings under Goal 9, the CIBL/EOA [36] provides a determination of the amount and type of land needed in the UGB amendment to accommodate Springfield's employment land needs for 2010-2030, and OAR 660-009-0005 states that "the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under Section (5), as wells as other provisions of law applicable in determining whether land is buildable or suitable."

To identify *potentially* suitable land to meet employment land needs, the City applied the following factors[37] (from an outline provided by DLCD Staff Gordon Howard) to exclude or include fourth priority lands in the next stage of the evaluation process:

- Exclude lands that are not buildable[38]
- Exclude lands based upon specific land needs (197.298(3)(a))

The next step in the process screened candidate lands to identify and compare lands having the site characteristics necessary for the operation of the target industrial and other employment industries identified in the CIBL/EOA. Springfield's EOA identifies a need for sites larger than 20 acres. As previously explained in this report, higher priority exception areas and marginal lands sites in the vicinity of the UGB will not provide suitable employment sites for the 2010-2030 planning period. Exception areas and marginal lands are inadequate to accommodate the type of employment land needed, thus the City's analysis considered land designated in the acknowledged Lane Rural Comprehensive Plan for agriculture or forestry or both.

<u>Background regarding City's process to identify candidate lands based upon specific land needs.</u> The following information is provided to explain how the City's alternatives analysis integrated public input received through a multi-year iterative planning process, and to explain maps and other materials dated 2008-2010 that are in the City's local record and/or have been integrated into this report.

Early in the City's land assessment process (2008-2009), the CIBL Technical and Stakeholder committees identified an initial set of lands they deemed worthy of further analysis to determine their suitability for urbanization. This input was based on early GIS screening of land surrounding the UGB by consultant ECONorthwest to locate priority lands under ORS 197.298, large parcel sizes, and land free of absolute development constraints. At that time and based on Springfield's preliminary draft analysis of residential and employment land needs, it was anticipated that UGB expansion would be required to meet both

[36] CIBL/EOA Table S-5, page x.

[38] "Buildable" is a Goal 10 term. It is the City's position that OAR 660-024-0060 (1) requires the City to consider whether sites are "suitable" at this "buildable" stage in the evaluation process.

employment *and* residential land needs. The record provides documentation of the 2008-2009 analysis process, including maps that assumed expansion for residential purposes in addition to employment purposes.[39] [40] For example, as shown in the following map dated 2008, nine areas were initially considered for further analysis and discussion through the City's the public involvement process 2008-2010. Other areas or specific parcels were proposed throughout the public involvement process and public hearing conducted by the Springfield and Lane County Planning Commissions in Feb-May 2010.

Initial study area identification: 2008-2009 CIBL/EOA public involvement process

The UGB study area established by the City includes land that was previously identified in the initial 2008-2009 Commercial and Industrial Lands Study planning process (CIBL Technical Advisory Committee and Stakeholder Advisory Committee, public workshops, open houses and public hearings) as having a reasonable potential to satisfy the residential and employment land need deficiencies that had been estimated at that time. The City's initial 2008-2009 Commercial and Industrial Lands Study planning process identified areas for evaluation and consideration based on an expected need for a larger UGB expansion to meet *both* residential and employment land needs. The City's final land need is for fewer acres of employment land — 223 acres — compared with the 640-acre deficit identified in the 2009 Draft CIBL/EOA. The City went on to meet its residential land deficit without expanding the UGB.

The City's final UGB expansion proposal also includes existing Willamalane parks and SUB public facilities to address concerns raised by the public, planning commissioners and elected officials during the 2008-2010 public involvement process.

EXCLUDE LANDS THAT ARE NOT BUILDABLE (SUITABLE) BASED UPON SPECIFIC LAND NEEDS [ORS 197.298(3)(a)]

[39] It is important to note that 2008-2009 analysis maps in the local record also relied upon older data sets that were later found to be incomplete or incorrect. For example, the floodway data for the Seavey Loop area was found to be inaccurate and was updated subsequently. This had the effect of substantially reducing the amount of unconstrained acreage from the area shown in the earlier 2008-2009 maps.

[40] The Metro Plan boundary was amended subsequent to the creation of the 2008-2009 maps.

This section of the report provides explanation and evidence to support the City's findings addressing ORS 197.298(1) through (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060 (1)(c), OAR 660-024-0060(1)(d),OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060(7), OAR 660-024-0060(8)(a), OAR 660-024-0060(8)(b), and OAR 660-024-0060(8)(c).

OAR 660-024-0060(1)(e)

> *"For purposes of this rule, the determination of suitable land to accommodate land needs must include consideration of any suitability characteristics specified under section (5) of this rule, as well as other provisions of law applicable in determining whether land is buildable or suitable."*

OAR 660-024-0060 (5)

> *"If a local government has specified characteristics such as parcel size, topography, or proximity that are necessary for land to be suitable for an identified need, the local government may limit its consideration to land that has the specified characteristics when it conducts the boundary location alternatives analysis and applies ORS 197.298."*

The Goal 9 rule clearly allows and requires the City to identify the typical attributes of employment land sites necessary to accommodate the industries and employers that will support the City's economic development objectives, based on the Economic Opportunities Analysis. The Goal 9 rule clearly allows and requires the City to designate suitable, serviceable sites, types and locations for employment uses — through its comprehensive plan and through appropriate implementing measures including amendments to plan and zone map designations, land use regulations, public facility plans, and transportation system plans.

"Site Characteristics" means the attributes of a site necessary for a particular industrial or other employment use to operate. Site characteristics include, but are not limited to, a minimum acreage or site configuration including shape and topography, visibility, specific types or levels of public facilities, services or energy infrastructure, or proximity to a particular transportation or freight facility such as rail, marine ports and airports, multimodal freight or transshipment facilities, and major transportation routes. [OAR 660-009-0005(11)]

"Suitable" means serviceable land designated for industrial or other employment use that provides, or can be expected to provide the appropriate site characteristics for the proposed use. [OAR 660-009-0005(12)]

As described in the preceding text and graphics, the City excluded parcels smaller than 5 acres in size and portions of parcels with absolute development constraints (slopes >15%, floodway, inventoried wetlands, waterways, and riparian resources) from consideration when it analyzed the potentially suitable acreage within a grouping of parcels of a particular soil capability classification, as permitted under OAR 660-024-0060(5).

As described and shown in the preceding text and graphics, and as verified by supporting evidence (GIS and Lane County Assessor parcel maps and RLID parcel data) in the record, the City applied characteristics of parcel size, topography, and absolute development constraints (floodway, wetlands, riparian resources) to fourth priority land areas in the Preliminary UGB Study Area to identify potentially suitable land to meet the employment land need, when it conducted the boundary location alternatives analysis and applied ORS 197.298. [OAR 660-024-0060(1)(e) and OAR 660-024-0060 (5)] .

After excluding lands based on soil capability classification, the City's analysis identified parcel groupings in Table 15 that contain *potentially* suitable fourth priority land. These areas were identified for additional analysis study to determine serviceability and suitability to determine which candidate lands in the vicinity of the UGB can "reasonably accommodate" the identified employment land need.

Public Services Analysis of Potentially Suitable Fourth Priority Land

OAR 660-024-0060(7)

> *"For purposes of Goal 14 Boundary Location Factor 2, "public facilities and services" means water, sanitary sewer, storm water management, and transportation facilities."*

Using GIS mapping and analysis tools and input received from the CIBL Technical Advisory Committee, City, County and State public agency staff including ODOT and Lane Transit District, other service providers and the public, the City conducted analysis to evaluate, compare and determine whether and how water, sanitary sewer, storm water management, and transportation facilities could be provided to potentially suitable fourth priority areas. The result of this step is a determination of whether parcels within each geographic grouping can reasonably be served to support the employment land uses identified in the CIBL/EOA within the 2010-2030 planning horizon.

The City correctly applied the requirement of OAR 660-024-0060(7) in its analysis of fourth priority land under ORS 197.298 by evaluating and comparing water, sanitary sewer, storm water management, and transportation facilities in its analysis of "public facilities and services", as demonstrated in the summary of data in Table 17 and as further supported by evidence in the record.

Table 17 summarizes and compares the opportunities and constraints associated with constructing public facilities and providing public services to lands in the vicinity of the Springfield UGB. The information summarized in Table 17 is based on information received from City engineering and transportation staff, the Springfield CIBL Technical Advisory Committee (TAC), service providers, public agency staff that were consulted with throughout the multi-year urbanization study process, and the public facilities plans identified in the previous sections of this report pages 218-239. The Public Facilities and Services Analysis identified physical constraints, engineering constraints, including legal constraints that affect or influence the physical placement of wastewater or stormwater management facilities.

The Public Services Analysis section of this report on pages 218-239 provides a general overview and maps of existing water, sanitary sewer, storm water management, and transportation facilities the City

referenced when it described the physical location and proximity of existing facilities to *potentially* suitable areas, when it to identified physical or regulatory barriers that would make service extensions difficult or physically infeasible to support development within the 2010-2030 planning period, and when it evaluated impacts to facilities needed to serve lands already in the UGB. As previously noted, that section of the report provides explanation and evidence to support the City's findings addressing ORS 197.2989(1)though (4), OAR 660-024-0060(1)(a), OAR 660-024-0060(1)(b), OAR 660-024-0060 (1)(c), OAR 660-024-0060(1)(e), OAR 660-024-0060(3), OAR 660-024-0060(4), OAR660-024-0060(5), OAR 660-024-0060(6), OAR 660-024-0060 (7), OAR 660-024-0060 (8)(a), OAR 660-024-0060 (8)(b), and OAR 660-024-0060 (8)(c) — including additional evidence to support the City's rationale for excluding areas from consideration in the previous step.

The analysis includes a high planning level assessment of the relative degree of difficulty of providing public facilities and services. Early in the iterative multi-year analysis process, engineering and transportation staff, public service agency staff were asked to assign a numeric value ranging from 1-5 to assess and compare the relative degree of difficulty of providing public facilities and services to an area with 1= EASIER, 3=MEDIUM DIFFICULT, 5=DIFFICULT.[41] The relative rankings assigned were based on conceptual-level discussion of the wastewater, transportation, and stormwater improvements that would likely be needed to provide these public services to serve general areas, not individual parcels. Relative degree of difficulty addressed providing services to the edge of an area and did not include providing services internally within an area. These discussions and assessments were not based upon detailed analysis and are therefore subject to change. <u>The cost of providing infrastructure and services was not estimated or evaluated at this point in the analysis</u>.

The City relied on the findings in Table 17 —as further documented by referenced facility plans, maps and supplemental evidence in the record — to determine whether *potentially suitable* candidate fourth priority lands can be served with public water, wastewater, stormwater, and transportation including public transit systems within the 2010-2030 planning period based on physical constraints. In this step, the City excluded lands it deemed not serviceable based on physical constraints — and therefore not suitable — from further consideration in the UGB Alternatives Analysis.

The City's evaluation of alternatives and its conclusions regarding serviceability and thus suitability are based on a comparative analysis of physical facilities and services constraints that is appropriate for this level of planning. The City applied service comparison factors uniformly to the land under each priority. The City's conclusions regarding which lands to exclude on the basis of public facilities constraints are reasonable and supported by evidence.

[41] Draft Buildable Lands Inventory, 12/11/09 by City Engineer Ken Vogeney, input from Springfield Utility Board

Table 17: Fourth Priority Land: Public Facilities and Services Analysis Summary	
North Gateway	
The City excluded **North Gateway — North of Sprague Road** lands on the basis of agricultural capability classification.	
North Gateway – UGB to Sprague Road:	
Water	**1 Easier** • Abuts City limits • An existing 12" line in Maple Island Road is 200 feet from the area. • An existing 24" line in Corporate Way is approximately 450 feet from the area. • An existing 12" line in Sportsway (Royal Caribbean) is approximately 310 feet from the area or 1000 feet from the area via Sportsway.
Wastewater	**1 Easier** • Abuts City limits • Existing sewer connections are located approximately 500 feet (at Corporate Way) and 1,700 feet (at Royal Caribbean) to the area. • A pressure main will need to be extended from the end of the existing 8-inch main on the south side of the Royal Caribbean site north to the area. • A pressure main will need to be extended from the existing 8-inch main in Corporate Way north to the area. • Pump station upgrades will be required for the existing pump station at International Way and International Court. • Pump station upgrades will likely be needed for the existing pump station at Deadmond Ferry Road and Game Farm Road to accommodate the additional flows from the Corporate Way line. • Internal improvements needed within the area: a new medium sized wastewater pump station located at the intersection of Sports Way extension and the existing UGB, and a new small sized wastewater pump station located at the existing UGB to connect to the pressure main extension from Corporate Way.
Stormwater	**3 Medium Difficult** • Abuts City limits • Stormwater management through the use of on-site retention and/or infiltration may be possible but limited by proximity to Springfield Utility Board's I-5 well field. • Physical connections to the McKenzie River or Maple Island Slough can be made with little or no impact on existing systems, although Maple Island Slough is currently blocked from flowing into the McKenzie River. A flow path would need to be restored if a significant amount of runoff is directed to the Slough. • The McKenzie River is federally classified as critical salmonid habitat. • Restoring a flow path from Maple Island Slough to the river will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, a designated Riparian Resource area, excavation in the waters of the state and waters of the United States, and potential wetlands. • New stormwater outfalls to the McKenzie River will also involve several other regulatory agencies for the same reasons as outfalls to Maple Island Slough. • Multiple overlapping regulatory jurisdictions for constructing new stormwater outfalls into the McKenzie River and/or the Maple Island Slough, and the limitations regarding on-site stormwater management, stormwater service for this area may present significant challenges and require atypical restrictions and limits.
Transportation including Transit	**5 Difficult (Trip capacity)**

	1 Easier (Transit service)
	• Abuts City limits
	• Nine offsite road extensions/improvements may be needed to provide service to the area:
	  ○ Extension of Maple Island Slough Road northerly towards the Maple Island Slough then extending westerly to the connection with Sports Way.[42]
	  ○ Extension of Sports Way northerly to the existing UGB line.
	  ○ Sprague Road overpass will likely need to be improved or reconstructed to accommodate traffic load and meet current design standards. Associated with this improvement, are improvements to Sprague Road westerly to Armitage Road.
	  ○ Armitage Road will likely need to be widened from Sprague Road to North Game Farm Road.
	  ○ Intersection improvements may be needed at Armitage Road and North Game Farm Road, such as the addition of a left turn lane and signal modifications.
	  ○ A bridge connection may be needed from the extended Maple Island Slough Road to Tax Lot 170315400040 in order to reduce impacts to natural resource areas and to the flood plain carrying capacity.
	  ○ Current studies for the Gateway/Beltline intersection and the Beltline/I-5 interchange show that current and planned development within the current UGB may not be able to be accommodated within the planning horizon, and potential mitigation projects have been identified. The additional vehicle trips from the North Gateway Area will require additional lane and intersection capacity that is not available in the planned mitigation projects, so that additional capacity will need to be provided.[43]
	  ○ Extension of Maple Island Slough Road Southerly from Game Farm Road to a connection point with Beltline Road.[44]
	  ○ The addition of capacity improvements will likely be needed for the interchange operations at Beltline Road and Interstate 5.[45]
	• Internal improvement needed within the area: Bridge connection from Tax Lot 17031540004000 over the Maple island Slough to Tax Lot 1703100002500 to provide internal circulation and reduce impacts to natural resource areas and to the flood plain carrying capacity.
	• Capacity constraints at Gateway/Beltline and Beltline/I-5 will pose significant challenges for development within the planning horizon.
	• The need to construct bridges to provide services and internal circulation will pose significant challenges for development within the planning horizon.
	• International Way is part of an existing and planned Frequent Transit Network route in the TSP and RTP. Area is within ½ mile of the existing EmX bus rapid transit line (RiverBend-Gateway) and EmX station located at International Way/Maple Island Road.

Urban services conclusion/ physical constraints **North Gateway**	Area is serviceable as described in OAR 660-009-0005(9). The City included the **North Gateway Fourth Priority** lands south of Sprague Road in the UGB. • Area is not physically constrained by slopes, river crossings or distance that would preclude provision of services as defined in OAR 660-009-0005(9).

[42] Roadway project is shown in Springfield TSP Figure 10 Recommended Roadway Network.
[43] "Gateway-Beltline intersection capacity improvements" is a project identified in the Springfield TSP.
[44] Project is identified in the Springfield TSP.
[45] Project is identified in the Springfield TSP.

Fourth Priority lands	• Proximity to the City and existing service connections increases the feasibility of extending or upgrading infrastructure and services to provide adequate capacity within the 20-year planning period ending 2030. • Protection of drinking water resources will present significant challenges for development within this area and will require special restrictions and/or limits. • Transportation constraints may present significant challenges for development within the planning horizon and may require atypical restrictions, limits or solutions.
McKenzie View	
The City excluded unconstrained **McKenzie View** lands comprising predominantly Class I and II soils on the basis of agricultural capability classification.	
Water	**5 Difficult** • Isolated by distance and topography from existing urban services • Separated from urban services by the McKenzie River, must cross river with urban services • Would need to bore under river (if permitted) to extend public water service main • Nearest water transmission line is a 24" line in the vicinity of 28th Street/Yolanda, approximately 6,000-8000 feet from potentially suitable parcels • Services would need to be extended through un-annexed land.
Wastewater	**5 Difficult** • Isolated by distance and topography from existing urban services • Separated from urban services by the McKenzie River, must cross river with urban services • Nearest collection system is across the river and more than 2,000 feet away: a 15" line in Vera Street. • Would need to upgrade Vera pump station. • Would need to bore under river (if permitted) to extend service main, then gravity flow to East Springfield interceptor. • Services would need to be extended through un-annexed land.
Stormwater	**3 Medium Difficult** • Separated from urban services by the McKenzie River • Isolated by distance and topography from existing urban services. • No developed system or outfalls in vicinity • New stormwater outfalls will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands. • The McKenzie River is federally classified as critical salmonid habitat. • Services would need to be extended through un-annexed land.
Transportation (including transit service)	**5 Difficult** • Isolated by distance and topography from existing urban services • Access from Springfield and I-5 is via McKenzie View Drive, a Rural Minor Collector – approximately 4.5 miles from UGB at Game Farm Rd.; or across the McKenzie River via Marcola Rd. (Rural Major Collector, 46-36' wide), Old Mohawk Rd. (Rural Minor Collector), and Hill Rd. (Rural Minor Collector) - approximately 4 miles from UGB at

	Hayden Bridge. • No access to Springfield or to I-5 except via Coburg Rd or Marcola Rd unless a new bridge over the McKenzie River is built. Depending upon new bridge location, existing Springfield street network would need to be upgraded and collectors/arterials added to provide transportation capacity. • All roads will need improvement to accommodate industrial or commercial development and multi-modal access • Services would need to be extended through un-annexed land. • Intersection improvements needed at Coburg Rd & McKenzie View Drive • Upgrade McKenzie View Drive to urban standards and provide capacity improvements • Marcola Road: "With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length." [46] • No transit services, pedestrian facilities or ADA access in area. • Same findings as Mohawk area regarding a need for upgrades to 42nd St., 42nd/Marcola intersection and 42nd and Hwy 126 interchange
Urban services conclusion/ physical constraints **McKenzie View Fourth Priority lands**	The City excluded the **McKenzie View Fourth Priority** lands from consideration because this area does not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield's identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).
Oxbow/Camp Creek	
The City excluded lands comprising predominantly Class I, Class II and Class III High Value Farmland soils on the basis of agricultural capability classification.	
Water	**5 Difficult** • Isolated by distance and topography from existing urban services • Separated from urban services by the McKenzie River, must cross river with urban services • Nearest water transmission line is a 16" line Marcola Rd. /Hayden Bridge • River is a barrier to extension of water transmission that makes extension of public water system infeasible [47] • Same findings as Mohawk are applicable. • Services would need to be extended through un-annexed land.
Wastewater	**5 Difficult** • Isolated by distance and topography from existing urban services • Separated from urban services by the McKenzie River, must cross river with urban services

[46] *Lane County Weight Restricted Bridges and Approved Route List* (Revised 02-2014), http://www.odot.state.or.us/forms/motcarr/od/4020.pdf, website accessed 2-5-16

[47] See email from City Civil Engineer Clayton McEachern P.E., to Linda Pauly, dated 2/8/16 describing physical constraints to extending a water transmission line across the McKenzie River either via the existing bridge or by boring underwater.

	• Would require pumping across the river and expanding capacity in existing sewer in Marcola Road (existing UGB). Geology precludes boring under river in this location. • EWEB intake at Hayden Bridge is the intake for the City of Eugene's water supply. • Would require new trunk line from North Springfield Interceptor to and along Hayden Bridge Rd and new pump stations inside area to get flow to new trunk. Bridge is high point. Pump stations are needed to bring flow up to bridge and across river, then gravity flow to interceptor. • Nearest collection system is a 10" line in Marcola Rd., more than 4,000 feet from Hayden Bridge. • Eastern Camp Creek parcels approximately 5 miles from nearest wastewater connection via Hayden Bridge/Marcola Rd. or via Hendricks Bridge/Main Street. • Same findings as Mohawk are applicable. • Services would need to be extended through un-annexed land.
Stormwater	**5 Difficult** • Separated from urban services by the McKenzie River • No new outfalls permitted upstream from Hayden Bridge (Three Basin Rule)[48] • EWEB intake at Hayden Bridge is the intake for the City of Eugene's water supply. • No developed system or existing discharge permits in vicinity • Same findings as Mohawk are applicable • Services would need to be extended through un-annexed land.
Transportation (including transit service)	**5 Difficult** • Isolated by distance and topography from existing urban services • Access from Springfield and I-5 is across the McKenzie River via Marcola Rd. (Rural Major Collector, 46-36' wide), Old Mohawk Rd. (Rural Minor Collector/Rural Local Collector, 30' wide), and Camp Creek Rd. (Rural Major Collector, 30' wide). Roads may need improvement to accommodate additional development and multi-modal access: • Upgrade 42nd St. to urban standards • Upgrade 42nd/Marcola intersection • Upgrade 42nd and Hwy 126 interchange • Upgrade Camp Creek to urban standards and provide capacity improvements • Would require internal collector street system • Marcola Road: "With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length." [49] • No transit services, pedestrian facilities or ADA access in area. • Same findings as Mohawk are applicable. • Services would need to be extended through un-annexed land.
Urban services conclusion: **Oxbow/Camp Creek Fourth**	The City excluded the **Oxbow/Camp Creek** area from consideration because these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided

[48] OAR 340-041-0350(1)(b) prohibits new or increased waste discharges that require NPDES permit, WPCF permit, or 401 Certification to the waters of the McKenzie River Subbasin above the Hayden Bridge (river mile 15).

[49] *Lane County Weight Restricted Bridges and Approved Route List* (Revised 02-2014), http://www.odot.state.or.us/forms/motcarr/od/4020.pdf, website accessed 2-5-16

Priority lands	with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield's identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).
Hayden Bridge	
The City excluded unconstrained lands on the basis of agricultural capability classification.	
Mohawk	
The City excluded unconstrained lands on the basis of agricultural capability classification.	
Water	**5 Difficult** • Isolated by distance and topography from existing urban services • Separated from urban services by the McKenzie River, must cross river with urban services • River is a barrier to extension of water transmission that makes extension of public water system infeasible[50] • Nearest water transmission line is a 16" line at Marcola Rd. /Hayden Bridge
Wastewater	**5 Difficult** • Isolated by distance and topography from existing urban services • Separated from urban services by the McKenzie River, must cross river with urban services • Will require pumping across the river and expanding capacity in existing sewer in Marcola Road (existing UGB). Geology precludes boring under river in this location. A line rupture in this location could contaminate Eugene's water supply. • Would require new trunk line from North Springfield Interceptor to and along Hayden Bridge Rd and new pump stations inside area to get flow to new trunk. Bridge is high point. Pump stations are needed to bring flow up to bridge and across river, then gravity flow to interceptor. • Nearest collection system is a 10" line in Marcola Rd., more than 4,000 feet from UGB, and 4 miles to outer areas
Stormwater	**5 Difficult** • Separated from urban services by the McKenzie River • No new outfalls permitted upstream from Hayden Bridge (Three Basin Rule[51]) • Eugene Water and Electric Board's water intake at Hayden Bridge would require significant separation from any new outfalls developed downstream from the intake[52] • No developed system in vicinity
Transportation (including transit service)	**5 Difficult** • Isolated by distance and topography from existing urban services • Access to Springfield is across the McKenzie River via 42nd Street and Marcola Rd. (Rural Major Collector, 46-36' wide), Old Mohawk Rd. (Rural Minor Collector/Rural

[50] See email from City Civil Engineer Clayton McEachern P.E., to Linda Pauly, dated 2/8/16 describing physical constraints to extending a water transmission line across the McKenzie River either via the existing bridge or by boring underwater.
[51] OAR 340-041-0350(1)(b) prohibits new or increased waste discharges that require NPDES permit, WPCF permit, or 401 Certification to the waters of the McKenzie River Subbasin above the Hayden Bridge (river mile 15).
[52] See email from City Civil Engineer Clayton McEachern P.E., to staff Pauly, dated 2/8/16 describing physical factors that preclude construction of new stormwater outfalls in the vicinity of EWEB's Hayden Bridge McKenzie River water intake facility.

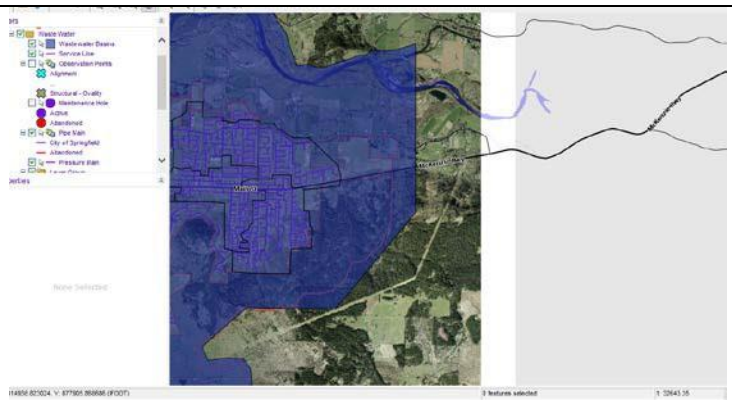
	Local Collector, 30' wide), and Camp Creek Rd. (Rural Major Collector, 30' wide). [53] [54] Roads may need improvement to accommodate additional development and provide multi-modal access: • Upgrade 42nd St. to urban standards[55] • Upgrade 42nd/Marcola intersection • May need to upgrade 42nd and OR 126 interchange[56] • Upgrade Camp Creek to urban standards and provide capacity improvements • Would require internal collector street system. • Existing bridge in place, but would need to be improved to provide full urban standards including multi-modal access. • Urban standards and capacity improvements needed on existing and future collector system from Mohawk/Highway 126 interchange to area, including Hayden Bridge Rd, 19th St, 23rd St, and 31st St • Previous ODOT study showed a need for upgrading at Hwy 126 and 42nd St. (without UGB expansion). Traffic backs up at the 42nd St. rail crossing at entrance to the IP plant, causing delays with access to Hwy 126. • Located 1-5 miles mile from Highway 126/I-105, and I-5 • Steep slopes east of Marcola Rd. • Access would route traffic through farmland and rural residential areas • Marcola Road and Old Mohawk Road: "With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length." [57] • No transit services, pedestrian facilities or ADA access in area. Nearest service is Route 17 Hayden Bridge Rd. and 19th Street. Route Description: **"**The route begins at Springfield Station (Bay B) and travels North on 5th Street where it serves Springfield City Hall and Library and the Fred Meyer Shopping Center. The bus travels East on Hayden Bridge Place, North on 7th Street, West on Hayden Bridge Road, and South onto 19th Street where it serves Mohawk Marketplace. The bus travels West on Q Street and South on 5th Street to return to Springfield Station."[58]
Urban services conclusion/ physical constraints **Mohawk**	The City excluded the **Mohawk Fourth Priority lands** from consideration on the basis of agricultural capability classification. These lands do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to

[53] Source of Functional Classifications: 2004 Lane County Transportation System Plan Functional Class Subarea 14 Map 4-14
[54] Source of road widths: Lane County Roads Inventory, http://www.lanecounty.org/Departments/PW/TransPlanning/Documents/AppendixB_RoadsInventory.pdf Accessed January 26, 2016
[55] Project # R-41 42nd St. from Marcola Rd. to railroad tracks is listed as a "20-year priority project" in the Springfield 2035 TSP Attachment A.
[56] See ODOT staff Helton email to staff Reesor, Dec. 29, 2008: "The interchange on Hwy 126 at 42nd St. has failing segments even with planned improvements, but it can probably be made to operate with additional improvements to the local system." Project #R-35 is identified as a "Beyond 20-year Project" in the 2035 Springfield TSP, Appendix A, p. 14.
[57] *Lane County Weight Restricted Bridges and Approved Route List* (Revised 02-2014), http://www.odot.state.or.us/forms/motcarr/od/4020.pdf, website accessed 2-5-16.
[58] Email from LTD staff Will Mueller, dated June 28, 2013 provides comments describing the physical requirements necessary to provide transit service applicable to extending transit service to any new areas: "Connecting roadways and streets would need to be constructed to city standards that support LTD's buses including sufficient lane width, intersection curb radii, and sidewalk width at prospective bus stops to meet ADA standards in effect at time of construction (2013 standards require 8' sidewalks at bus stops).

Fourth Priority lands	physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield's identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).
North Springfield Highway	
The City excluded unconstrained parcels on the basis of agricultural capability classification.	
Water	**1 Easier** • Abuts City Limits • An older 12" line in High Banks road is approximately 270 feet from the area. • A newer 24" line is in 52nd Street to serve Hyland Business Park, approximately 1300 feet from the area via High Banks Road.
Wastewater	**1 Easier** • Abuts City Limits • A new large wastewater pump station is required to get flow from this area into the existing 15-inch main in High Banks Road. For this study, the location for the new large pump station was assumed to be in the vicinity of High Banks Road and 52nd Street. • Internal improvements needed within the area: new small sized wastewater pump stations located in the vicinity of Tax Lot 1702280000304 and Northwest portion of the Tax Lot 1702280000103.
Stormwater	**5 Difficult** • Abuts City Limits • Physical connections to Cedar Creek or the McKenzie River can be made with little or no impact on existing stormwater systems. Oregon's Three Basin Rule (OAR 340-041-0350) restricts new stormwater outfalls and other discharges to the McKenzie River upstream of Hayden Bridge. • New stormwater outfalls to Cedar Creek or to the McKenzie River will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands. • Stormwater management through the use of on-site retention and/or infiltration may be allowable in this area as it is outside of the zone of contribution for Springfield Utility Board's wells. • The McKenzie River and Cedar Creek are federally classified as critical salmonid habitat. Considering the multiple overlapping regulatory jurisdictions for constructing new stormwater outfalls into the McKenzie River and/or Cedar Creek, stormwater service for this area may be feasible if on-site stormwater management techniques that maximize stormwater retention and infiltration are required.

Transportation (including transit service)	**2 Easier**
	• Abuts City Limits
	• Four offsite road extensions/improvements are needed to provide service to the area:
	  ○ A new at grade intersection or interchange will be needed at the intersection of OR Highway 126 and 52nd Street.
	  ○ Intersection improvements for increased capacity will be needed at the intersection of Main Street and OR Highway 126.
	  ○ A new at grade intersection improvement will be needed for the intersection of 52nd Street and High Banks Road.
	  ○ A new at grade intersection improvement will be needed for the intersection of 58th Street and High Banks Road.
	• Internal improvements needed within the area: bridge connections over existing ditches

	and creeks to access the northern portion of the area.
Urban services conclusion/ physical constraints **North Springfield Highway Fourth Priority lands**	• Area is serviceable for water, wastewater and transportation as described in OAR 660-009-0005(9). Area is not physically constrained by slopes, river crossings or distance that would preclude feasible provision of water, wastewater and transportation services. • Area is physically constrained for stormwater management due to existing physical capacity limitations on receiving streams within the basin, floodplain, and regulatory restrictions on new discharges to receiving streams and rivers. • Stormwater management may become physically feasible if regulatory barriers can be met through use of engineered on-site stormwater management facilities that maximize stormwater retention and infiltration.
Thurston	
The City excluded unconstrained land comprising predominantly Class I and II soils on the basis of agricultural capability classification.	
Far East	
The City excluded unconstrained land comprising predominantly Class I and II soils (north of Highway 126) on the basis of soils capability classification.	
The unconstrained land south of Highway 126 was excluded on the basis of specific land needs (197.298(3)(a)).	
Water	**Within one mile of UGB 2: Medium** **More than one mile from UGB: 5 Difficult** • Separated from urban services by distance and topography. • The nearest transmission line is the 12" line terminating ½ mile east of the existing UGB on Main St/Hwy 126. • Services would need to be extended through un-annexed land. • Distant from SUB service area. • Higher elevations would require pumping and reservoir.
Wastewater	**5 Difficult** • Separated from urban services by distance and topography. • The nearest service connection of sufficient size for industrial and commercial uses is the 15" line at Main Street/S. 72nd, approximately 1.5 miles to the western boundary of the area • Services would need to be extended through un-annexed land. • May require a new pump station at bottom of Cedar Flat/126 and force main to bring gravity flow to Thurston trunk sewer. May need to be a stepped system to address topography. • New or upgrade trunk line may be needed in Thurston Rd. from North Springfield interceptor at International Paper (unfunded upgrade project is identified in CIP). • Services would need to be extended through un-annexed land. • Steep slopes south of McKenzie Hwy/Main St.

	 City of Springfield wastewater basin (shown in blue)and service main in relationship with **Far East, Thurston** and **Oxbow/Camp Creek** areas
Stormwater	**5 Difficult** • No developed system in vicinity • Cedar Creek drainage basin is nearing stormwater receiving capacity[59], [60] (unfunded upgrade project is identified in CIP). • No new outfalls permitted on McKenzie River upstream from Hayden Bridge (Three Basin Rule) [61] • Sensitive environmental protection/salmonid species habitat restoration projects will limit/restrict new outfalls • Ability to manage stormwater on-site will be limited by high water table and typically[62] requires 8-10% of parcel area. • Services would need to be extended through un-annexed land.
Transportation (including transit service)	**5 Difficult** • Separated from urban services by distance and topography. • Access is from E. Main Street/McKenzie Hwy (State Highway), with secondary access from Thurston Road (Rural Major Collector). • Two new bridges would be needed over Cedar Creek on 66th and Weaver Lane. • 66th St., Weaver Lane and Billings Rd. would require urban standards improvements and capacity upgrades. • Extend Billings Rd. to E. Main St. • Upgrade capacity on 66th St. from Main St. to Thurston Rd. • Upgrade capacity on Thurston Rd. and provide urban standards from 69th St. to E. Main Street • Improve Thurston Rd between Weaver Rd. and UGB[63] • Intersection improvements at Thurston Rd. and E. Main St.

[59] *City of Springfield Stormwater Facilities Master Plan*, Oct. 2008; *City of Springfield Stormwater Management Plan,* updated 2010, http://springfield-or.gov/ESD/stormwater%20management%20plan%202008.pdf, accessed 2/8/16.

[60] City of Springfield Stormwater Basin Characterization Study, Lane Council of Governments, 2008, pp. 17-26 describes existing outfalls and water quality concerns in this basin.

[61] OAR 340-041-0350(1)(b) prohibits new or increased waste discharges that require NPDES permit, WPCF permit, or 401 Certification to the waters of the McKenzie River Subbasin above the Hayden Bridge (river mile 15). The McKenzie supports anadromous and resident fish species and is considered "essential fish habitat" for threatened and endangered species (Table 11, p. 20).

[62] *Eugene Stormwater Management Manual* "Simplified Method", Appendix C, is a rule of thumb Springfield engineers use for typical small developments.

[63] Project #US-14 is identified in the 2030 Springfield TSP as a Priority Project on the 20-year project list, Projects on Lane CO. Facilities, Attachment A, with an estimated cost of $4,800,000.

	• Would need internal collector street system • Access to Exception C from Cedar Flat Road, Rural Local Collector • slopes between E. Main Street/McKenzie Hwy and parcels limit constrain options • "Main St/Straub Parkway intersection is failing today even with planned interchange improvements", and there are safety issues with signal. Traffic would need to be distributed differently. Significant development would need to participate in funding of ODOT IAMP. Impacts to the OR126/Main St intersection should be considered. ODOT's previous analysis indicate that the OR 126/Main St, Main St/54th St. and Main St/58th St all exceed capacity by 2031. [64], [65] • Services would need to be extended through un-annexed land. • Frequent transit service is not planned beyond Thurston Station.
Urban services conclusion: **Far East Fourth Priority lands**	**Far East Fourth Priority lands within 1 mile of the UGB** were considered physically serviceable for water and transportation during the 20-year planning period ending 2030 as described in OAR 660-009-0005(9). • Area is physically constrained for stormwater management due to existing physical capacity limitations on receiving streams within the basin, floodplain, and regulatory restrictions on new discharges to receiving streams and rivers. • Stormwater management may become physically feasible if regulatory barriers can be met through use of engineered on-site stormwater management facilities that maximize stormwater retention and infiltration. • Area is physically constrained for wastewater service. Distance would likely preclude feasible extension of wastewater service within the 20-year planning period. The City excluded the **Far East Fourth Priority lands** farther than 1 mile from the UGB from consideration because this area does not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield's identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).
South Hills	
The City excluded unconstrained lands comprising predominantly Class III High Value Farmland soils on the basis of agricultural capability classification.	
The City excluded unconstrained lands on the basis of specific land needs (197.298(3)(a)).	
West Jasper/Mahogany	
The City excluded unconstrained lands comprising predominantly Class II soils on the basis of agricultural capability classification.	
The City excluded unconstrained parcels on the basis of specific land needs (197.298(3)(a)).	

[64] Comment received ODOT staff Crawford, meeting on June 11, 2013 and email dated June 18, 2013.

[65] Interchange improvements at Main St/Hwy 126 and Highway 126 at 52nd are listed as financially constrained projects in the Regional Transportation Plan (RTP) and are identified as 20-year Priority Projects in the 2035 Springfield TSP, Attachment A .

Water	**3 Medium Difficult** • The nearest lines of sufficient size to serve industrial or commercial employment uses are the 16" line in South 57th /Mount Vernon Rd. and 16" line at Linda Lane, located approximately ½ mile from the eastern boundary of the area at Mahogany Lane. • Services would need to be extended under the Union Pacific railroad line and across Jasper Road. [66]
Wastewater	**1 Easier** • The Jasper Trunk sewer 27" line is located approximately 200 feet to the east across Jasper Road and the railroad to the boundary of this area. • Services would need to be extended through un-annexed land and would require easements to facilitate feasible service connections • A large wastewater pump station will be needed in the vicinity of the intersection of Mt. Vernon Road and Jasper Road, on the north side of the Union Pacific Railroad mainline to get flows from Mahogany Lane area into the Jasper Trunk Sewer. Capacity in this Trunk Sewer is not expected to be a concern because flow timing and rates can be managed via the pump station.
Stormwater	**3 Medium Difficult** • Physical connections to the Middle Fork Willamette River and Jasper Slough system can be made with little or no impact on existing stormwater systems, although the flow capacity of portions of Jasper Slough system would likely need to be increased before additional runoff could be directed to it. • Few if any of the intermittent flow channels of the Jasper Slough system are maintained as drainage ways. Development of the area will require public acquisition and improvement of at least some of these channels to ensure that stormwater runoff can be safely conveyed to the River. • The Middle Fork Willamette River and Jasper Slough system are federally classified as critical salmonid habitat. • New stormwater outfalls will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands. • Stormwater management through the use of on-site retention and/or infiltration would likely not be allowed in the area due to its proximity to Springfield Utility Board's Willamette well field.

Transportation including Transit	**5 Difficult**
	• Eight offsite road extensions/improvements are needed to provide service to the area:
	  ○ Intersection improvements will be needed at Jasper Road and Mt. Vernon Road, which will include improvements to the Union Pacific Railroad crossing and a new traffic signal.
	  ○ Improvements to Mt. Vernon Road from Jasper Road to South 57th Street will be required for additional capacity.
	  ○ Intersection improvements will be needed at Bob Straub Parkway and Mt. Vernon Road, which will include a new traffic signal.
	  ○ Intersection improvements will be needed at Bob Straub Parkway and Jasper Road, which will include a new traffic signal.
	  ○ A new road connection from Bob Straub Parkway to Jasper Road will be needed in the vicinity of Tax Lot 1802090000103, which will include a new grade separated crossing over the railroad.
	  ○ Improvement of the entire length of Jasper Road to urban standards and upgrade to

[66] Bart McKee, SUB stated that it would be physically possible to bore under the railroad in the vicinity to extend water service to the area.

	4 lanes to Main Street via South 42nd Street, including Union Pacific mainline crossing upgrades on South 42nd Street and intersection upgrades along the length of the entire corridor. o Improvements to Bob Straub Parkway from Jasper Road to Daisy Street, upgrading to 4 lanes. o Intersection improvements will be needed at Bob Straub Parkway and Daisy Street. • Internal improvements needed within the area: o A new small sized wastewater pump station will likely be needed located in the vicinity of the southerly end of Tax Lot 1802090000600. o A new small sized wastewater pump station will likely be needed located in the vicinity of the easterly side of Tax Lot 1802090000200. o It is anticipated one or two additional small pump stations may be needed to serve some portions of the area depending upon future development configuration and topography. o Improvements to the existing Mahogany Lane will be needed for additional capacity. o The potential for two bridge connections over flood plain designated sloughs to facilitate internal circulation.
Urban services conclusion: **West Jasper/ Mahogany Fourth Priority lands**	Area was considered physically serviceable during the 20-year planning period ending 2030 as defined in OAR 660-009-0005(9). • Area is not physically constrained by slopes, river crossings or distance that would preclude provision of services as defined in OAR 660-009-0005(9). • Proximity to the City and existing wastewater service connection increases the feasibility of extending or upgrading infrastructure and services to provide adequate capacity within the 20-year planning period ending 2030. • Protection of drinking water resources will present significant challenges for development within this area and will require special restrictions and/or limits. • The significant needs for transportation facility upgrades to serve industrial and commercial employment uses present significant challenges for development within the planning horizon.
Jasper Bridge	
The City excluded area comprising predominantly Class I and II soils on the basis of agricultural capability classification.	
Urban services conclusion: **Jasper Bridge Fourth Priority lands**	The City excluded the **Jasper Bridge** Fourth priority lands from consideration because these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield's identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).
Clearwater	
The City excluded unconstrained parcels comprising predominantly Class II soils on the basis of agricultural capability classification.	
The City excluded unconstrained parcels on the basis of specific land needs (197.298(3)(a)).	
Water	**3 Medium Difficult**

	• 16" line in the vicinity of Daisy and 48th Street (Westwind) is approximately ½ mile north of the UGB • Nearest 12" line is in South 42nd approximately ¼ mile to the UGB via 42nd Street
Wastewater	**2 Easier** • The Jasper Trunk sewer 27" line is located along Jasper Road. • Distance to potentially suitable land varies from approximately 330 feet at 42nd Street to 200 feet (across Jasper Slough) at 41st/Filbert Meadows to 1364 feet at South 39th • Services would need to be extended through un-annexed developed residential land to reach some portions of this area.
Stormwater	**3 Medium Difficult** • Physical connections to the Middle Fork Willamette River and Jasper Slough system can be made with little or no impact on existing stormwater systems, although the flow capacity of portions of Jasper Slough system would likely need to be increased before additional runoff could be directed to it. • Few if any of the intermittent flow channels of the Jasper Slough system are maintained as drainage ways. Development of the area will require public acquisition and improvement of at least some of these channels to ensure that stormwater runoff can be safely conveyed to the River. • The Middle Fork Willamette River and Jasper Slough system are federally classified as critical salmonid habitat. • New stormwater outfalls will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands. • Stormwater management through the use of on-site retention and/or infiltration would likely not be allowed in the area due to its proximity to Springfield Utility Board's Willamette well field.

Transportation	**5 Difficult**
	• Clearwater Lane would need to be upgraded to urban standards and may be of to serve industrial and commercial employment uses. [67]
	• Secondary access would be required.
	• Offsite road extensions/improvements are needed to provide service to the area:
	  ○ Intersection improvements will be needed at Jasper Road and Mt. Vernon Road, which will include improvements to the Union Pacific Railroad crossing and a new traffic signal.
	  ○ Improvements to Mt. Vernon Road from Jasper Road to South 57th Street will be required for additional capacity.
	  ○ Intersection improvements will be needed at Bob Straub Parkway and Mt. Vernon Road, which will include a new traffic signal.
	  ○ Intersection improvements will be needed at Bob Straub Parkway and Jasper Road, which will include a new traffic signal.
	  ○ Improvement of the entire length of Jasper Road to urban standards and upgrade to 4 lanes to Main Street via South 42nd Street, including Union Pacific mainline crossing upgrades on South 42nd Street and intersection upgrades along the length of the entire corridor.
	  ○ Improvements to Bob Straub Parkway from Jasper Road to Daisy Street, upgrading to 4 lanes.
	  ○ Intersection improvements will be needed at Bob Straub Parkway and Daisy Street.

[67] Urban Standards Project US-14: Clearwater Lane – south of Jasper Road to UGB is identified in TSP Projects located on Lane County facilities in the TSP Table 1 as a Priority Project in the 20-year project list.

	• Internal improvements be needed within the area: small-medium sized wastewater pump station to get flow to Jasper Trunk • Nearest transit service is along Main Street, approximately ¾ mile to UGB/northern boundary of area • A planned bike boulevard along Virginia-Daisy is approximately ½ mile to UGB/northern boundary of area.
Urban services conclusion: **Clearwater Fourth Priority lands**	Area is physically serviceable as defined in OAR 660-009-0005(9). Area is not physically constrained by slopes, river crossings or distance that would preclude feasible provision of water, wastewater and transportation services. • Proximity to the City and existing wastewater service connection increases the feasibility of extending or upgrading infrastructure and services to provide adequate capacity within the 20-year planning period ending 2030. • Protection of drinking water resources will present significant challenges for development within this area and will require special restrictions and/or limits. • The significant needs for transportation facility upgrades to serve industrial and commercial employment uses present significant challenges for development within the planning horizon.
Mill Race	
Water	**1 Easier** • There is ample existing water distribution infrastructure already located within this area to serve industrial and commercial employment uses. • SUB's existing 60" line in South 28th Street extends south of the Mill Race along the eastern boundary of this area.[68] • Existing 20" and 16" lines cross the Mill Race. • A 16" line extends south to wellfield site via easements on private lands. • A new 24" line was recently installed along the north side of the Mill Race. • A T was installed in F Street to extend a 12" line to serve properties adjacent to the Swanson Mill site. • There are no major improvements anticipated to meet the internal water service needs within this area.
Wastewater	**3 Medium Difficult** • The nearest wastewater line is the 48" trunk line in F Street at 28th Street, located approximately 1400-1700 feet from the area. • A new small sized wastewater pump station located near the south side of the South 28th Street Bridge over the Mill Race will be needed to provide service to this area. • A main line extension in south 28th Street from the South F Street interceptor to the new pump station will be needed. • Abuts City limits • There are no major improvements anticipated to meet the internal wastewater needs to serve this area.
Stormwater	**3 Medium Difficult** • Physical connections to the Springfield Mill Race, Gory Creek or Quarry Creek can be made with little or no impact on existing systems, although the flow capacity of the two creeks would likely need to be increased before additional runoff could be directed to them. • New stormwater outfalls to any of these three receiving waters will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, a designated Riparian Resource area, excavation in the waters of the state and

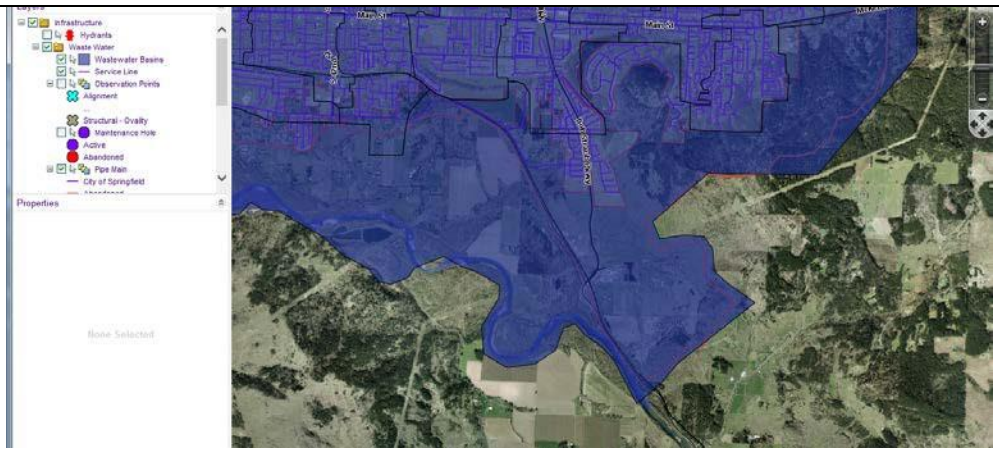
[68] Updated water line information provided by Bart McKee, SUB (telephone call with staff Pauly, April 5, 2016).

	waters of the United States, and potential wetlands. New stormwater outfalls to the Springfield Mill Race are also regulated by an intergovernmental agreement with the US Army Corps of Engineers as part of the Mill Race enhancement project. • Stormwater management through the use of on-site retention and/or infiltration would likely be limited in this area due to its proximity to Springfield Utility Board's Willamette well field. • Abuts City limits • The Middle Fork Willamette River is federally classified as critical salmonid habitat and the Springfield Mill Race enhancement project was performed to provide additional salmonid habitat. • Stormwater service within this area may require atypical restrictions and solutions and will present significant challenges considering the multiple overlapping regulatory jurisdictions for constructing new stormwater outfalls into the Springfield Mill Race, Gory Creek or Quarry Creek, and the limitations regarding on-site stormwater management. • There are no major improvements anticipated to meet the internal stormwater needs to serve this area.
Transportation	**4 Difficult** Abuts City limits Five offsite road extensions/improvements are needed to provide service to the area: • South 28th Street will need to be improved from Main Street southerly to the existing UGB near the Mill Race.[69] • Crossing improvements for the intersection of South 28th Street and the Union Pacific Railroad will be needed. • Upgrades to the existing South 28th Street bridge at the Mill Race may be required due to weight limit restrictions. • Intersection improvements will be needed at the intersection of Main Street and South 28th Street. • A secondary access will be needed. Options include improving access via South F Street or bridge over the Mill Race and Jasper Slough to a connection point near the intersection of Jasper Road and South 32nd Street. • Service to this area may be feasible; however providing service will have significant challenges due to the need for improving access and providing secondary access. This access may require constructing a bridge over Mill Race and Jasper Slough to a connection point near the intersection of Jasper Road and South 32nd Street. • Existing frequent transit service is available on Main Street, approximately .75 miles from the UGB at 28th Street. The Main Street Corridor is a planned Frequent Transit Network route in the TSP and RTP. The area is within ½ mile of the Main Street Corridor (South A). • Planned and funded bicycle facilities along the Mill Race/Booth Kelly Road will provide ped/bike connectivity between Main Street, Downtown Springfield and Mid-Springfield and the existing Middle Fork Path recreational path system immediately adjacent to this area. • There are no major improvements anticipated to meet the internal transportation needs to serve this area.
Urban services conclusion:	Area is serviceable as described in OAR 660-009-0005(9). The City included the **Mill Race Fourth Priority** lands in the UGB.[70]

[69] Urban Standards Project US-7: South 28th Street – F Street to UGB is identified in TSP Projects located on Lane County facilities, Table 4 as a Beyond 20-year project.

Mill Race Fourth Priority lands	• Area is not physically constrained by slopes, river crossings or distance that would preclude provision of services as defined in OAR 660-009-0005(9). • Proximity to the City and existing service connections increases the feasibility of extending or upgrading infrastructure and services to provide adequate capacity within the 20-year planning period ending 2030. • Protection of drinking water resources will present significant challenges for development within this area and will require special restrictions and/or limits.
Wallace Creek	
The City excluded unconstrained lands comprising predominantly Class II and Class III High Value Farmland soils on the basis of agricultural capability classification.	
Water	**5 Difficult** • Separated from urban services by distance and topography. • Located more than 3 miles from the nearest water main. • The nearest water transmission line is the 24" "Natron" water line, extended in 2013 to the SW corner of the school district property. The 16" line from Westwind/Linda Lane provides a looped system. • A planned 24" line will extend south from Weyerhaeuser Haul Rd. to serve the SE portion of the UGB. • Wallace Creek Rd. narrow, winding corridor alignment and topography preclude infrastructure extensions. Extension along Weyerhaeuser Haul Road alignment may be a possible alternative. • Separated by at-grade rail crossing at Jasper Rd/Wallace Creek Rd. • No developed system in vicinity
Wastewater	**5 Difficult** • Isolated by distance and topography from existing urban services • No developed system in vicinity. • Wallace Creek Rd.'s narrow, winding corridor alignment and topography preclude infrastructure extensions. Extension along Weyerhaeuser Haul Road alignment may be a possible alternative to serve parcels in Haul Road area. • The Jasper Trunk sewer is 2-3 miles away. • It is anticipated one or two additional small pump stations may be needed to serve some portions of the area depending upon future development configuration and topography. • Jasper trunk sewer may not have adequate capacity to serve additional industrial uses, so a new parallel trunk may be necessary. • Separated by at-grade rail crossing at Jasper Rd/Wallace Creek Rd.

[70] See proposed Metro Plan Amendment for parcel numbers designated Urban Holding Area – Employment. Note other publicly owned lands in this area designated Public/Semi Public that the City added to the UGB to accommodate existing and planned SUB water treatment facilities and Willamalane parks.

	 City of Springfield wastewater basin (shown in blue)and service main in relationship with **Wallace Creek**, **South Hills, West Jasper Mahogany,** and **Jasper Bridge** areas
Stormwater	**5 Difficult** • Upgrade existing Wallace Creek outfall to Middle Fork Willamette River • No developed system in vicinity • Physical connections to the Middle Fork Willamette River system can be made with little or no impact on existing stormwater systems. • Development of the area will require land acquisition to safely convey stormwater runoff to the river if lands are not bordering Wallace Creek • New stormwater outfalls will involve several other regulatory agencies because the work would affect threatened and endangered species habitat, excavation in the waters of the state and waters of the United States, and potential wetlands. • Stormwater management through the use of on-site retention and/or infiltration would be challenging given the sloped topography and location relative to Springfield Utility Board's Willamette well field. • The Middle Fork Willamette River is federally classified as critical salmonid habitat.
Transportation (including transit service)	**5 Difficult** • Isolated by distance and topography from existing urban services • Would require secondary access • Existing rail crossing at Jasper Rd/Wallace Creek Rd. is substandard. Upgrade would be needed. An at-grade crossing may not be feasible in this location. Existing traffic waiting to cross backs into Jasper Rd. 24 trains/day. • Wallace Creek Road will need improvement to urban standards. The existing narrow, winding alignment through sloped topography is a constraint. • DOGAMI SLIDO mapped landslide hazard area along Wallace Creek Road • Access via Jasper Rd., but urban standards and capacity improvements needed[71]: Improvement of the entire length of Jasper Road to urban standards and upgrade to 4 lanes to Main Street via South 42nd Street, including Union Pacific mainline crossing upgrades on South 42nd Street and intersection upgrades along the length of the entire corridor. • Topography limits expansion of Jasper Rd. portion of the narrow corridor next to the Willamette River • May trigger capacity improvements (4-lane section) for Bob Straub Parkway: Improvements to Bob Straub Parkway from Jasper Road to Daisy Street, upgrading

[71] See Jasper Bridge exception area

	to 4 lanes. • Intersection improvements will be needed at Bob Straub Parkway and Daisy Street. [72] • Jasper Rd. & Straub Parkway: "With Permit Truck-Tractor Semitrailer Combinations may operate at a maximum of 75 feet in overall length. The maximum length of a semitrailer in a truck tractor semitrailer combination is 53 feet. Double Trailer Combinations may operate at a maximum of 95 feet in overall length." • Intersection improvements will be needed at Bob Straub Parkway and Jasper Road, which will include a new traffic signal. • A new road connection from Bob Straub Parkway to Jasper Road will be needed in the vicinity of Tax Lot 1802090000103, which will include a new grade separated crossing over the railroad. • Connection to Hwy 58 but limited connection to Hwy 126/I-5 • "Need to further study capacity at the I-5/Hwy 58th interchange. Improvements may be needed depending on size and location of expansion area." [73] • Nearest transit service is at Thurston Station on Main Street, >3 miles away.[74] No transit services, pedestrian facilities or ADA access in area. • "Main St/Straub Parkway intersection is failing today even with planned interchange improvements", and there are safety issues with signal. Traffic would need to be distributed differently. Significant development would need to participate in funding of ODOT IAMP. Impacts to the OR126/Main St intersection should be considered. ODOT's previous analysis indicate that the OR 126/Main St, Main St/54th St. and Main St/58th St all exceed capacity by 2031. " [75, 76]
Urban services conclusion: **Wallace Creek Fourth Priority lands**	The City excluded the **Wallace Creek** area from consideration because the area does not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses in this location. Providing service to the area will present significant challenges not only in the length of improvements, but also the multiple at grade railroad crossings that will likely be needed along Jasper Road and Wallace Creek Rd. In addition, Jasper Road will likely need to be upgraded to provide capacity for employment development. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extensions and upgrades of water, wastewater and transportation, services including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield's identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).
Seavey Loop	
The City excluded unconstrained lands comprising predominantly Class II, Class III High Value Farmland and Class	

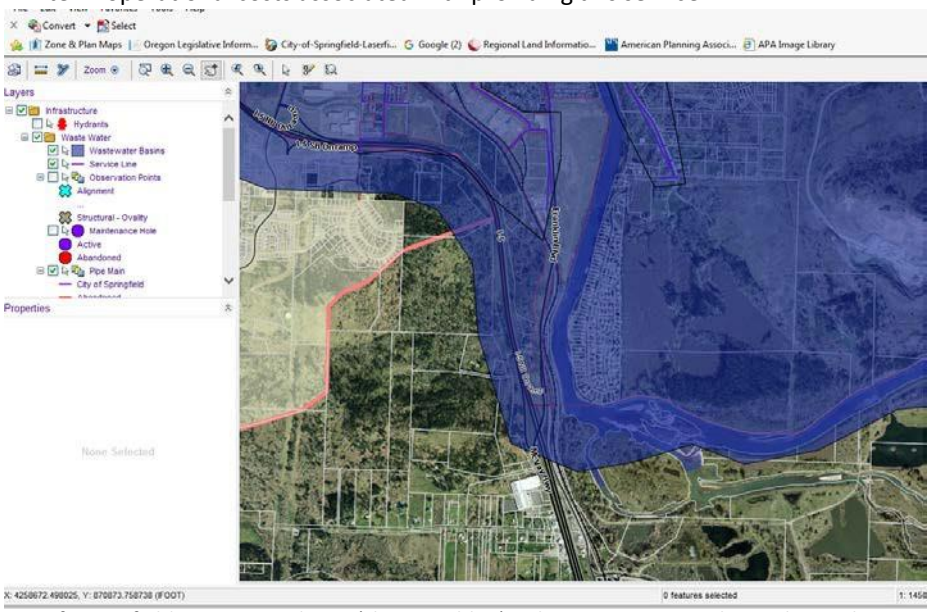
[72] Project #R-44 is identified as a "Beyond 20-year Project" in the 2035 Springfield TSP

[73] Comments received from ODOT Region 2, Area 5 staff Savannah Crawford, email dated June 18, 2013.

[74] Email from LTD staff Will Mueller, dated June 28, 2013 provides comments describing the physical requirements necessary to provide transit service applicable to extending transit service to any new areas: "Connecting roadways and streets would need to be constructed to city standards that support LTD's buses including sufficient lane width, intersection curb radii, and sidewalk width at prospective bus stops to meet ADA standards in effect at time of construction (2013 standards require 8' sidewalks at bus stops).

[75] Comments received from ODOT staff Crawford, meeting on June 11, 2013 and email dated June 18, 2013.

[76] Interchange improvements at Main St/Hwy 126 and Highway 126 at 52nd are listed as financially constrained projects in the Regional Transportation Plan (RTP).

IV Prime soils on the basis of agricultural capability classification.	
Water	**3 Medium Difficult** • Existing rural water system and service provided by Willamette Water Company • Potentially suitable lands are located more than 2 miles from the nearest SUB water main, a 16" line in McVay
Wastewater	**5 Difficult** • No developed system in vicinity • Isolated by distance and topography from existing urban services • Would require extension of a pressure main from the Franklin/McVay trunk 18" line in Glenwood, approximately 2 miles to the western boundary of the potentially suitable lands. • Would require upgrades to existing Glenwood MWMC pump station. • A new large sized wastewater pump station located near the intersection of Seavey Loop and Franklin Boulevard will be needed. • Would require a new small sized wastewater pump station located in the vicinity of the intersection of 30th Avenue and College View Road. • Would require a new wastewater gravity/pressure main extension from the new pump station at 30th Avenue and College View Road to a new pump station in the vicinity of the intersection of Seavey Loop and Franklin Boulevard, and a gravity main extension along College View Road southerly, ending near the intersection with Franklin Boulevard in order to serve existing properties. • Would require a new small sized wastewater pump station located near the intersection of Franklin Boulevard and Twin Buttes Road. • Would require a new small sized wastewater pump station located in the vicinity of Seavey Loop Road near the West property line of the Tax Lot 1803141000305. • Wastewater service to this area could become feasible in the future beyond the planning period, however given its removed location from the rest of Springfield, and the number of new pump stations that will likely be needed to provide service, there would be long-term operational costs associated with providing this service.  City of Springfield wastewater basin (shown in blue)and service main in relationship with **Seavey Loop** study area
Stormwater	**5 Difficult**

	• Isolated by distance and topography from existing urban services • Physical connections to Oxley Slough and/or the Coast Fork Willamette River can be made with little or no impact on existing stormwater systems, although the connection locations may need to be outside of the proposed expansion area. • New stormwater outfalls to Oxley Slough and/or the Coast Fork Willamette River receiving waters will involve several other regulatory agencies because the work would affect riparian areas, excavation in the waters of the state and waters of the United States, and potential wetlands. • While the Coast Fork Willamette River is not federally classified as critical salmonid habitat, the State has designated the Coast Fork Willamette River as essential salmonid habitat. • Stormwater management through the use of on-site retention and/or infiltration may be allowable in this area as it is outside of the zone of contribution for Springfield Utility Board's wells and no other wellhead protection zones have been identified to the City's knowledge. • Considering the multiple overlapping regulatory jurisdictions for constructing new stormwater outfalls into the Coast Fork Willamette River and/or Oxley Slough, stormwater service for this area may be feasible if on-site stormwater management techniques that maximize stormwater retention and infiltration are required.
Transportation (including transit service)	**5 Difficult** • Proximate to I-5, but freeway access is indirect and limited by the awkward connection and limited capacity at Franklin and 30th Ave. interchange. Access to I-5 at south end of area is from beneath the freeway, via Highway 58/Goshen interchange. • Limited capacity at I-5/30thStreet interchange. "Need to further study capacity at the I-5/30th Street interchange and the I-5/Hwy 58th interchange. Improvements at one or both locations may be needed depending on size and location of expansion area." [77] • City staff identified a need for an Extension of 30th Avenue as a grade separated to the intersection with Franklin Boulevard and Seavey loop near the southeast corner of the EPUD property. This excludes I-5 interchange improvements or upgrades. [78] • City staff identified a need for the north end of Seavey Loop Rd. to be reconfigured to terminate South of Franklin Boulevard (North of EPUD). • Existing rail underpass at Franklin is very narrow and restricts truck passage. • Opportunities for rail access are unlikely, given the existing infrastructure configuration, lack of siding and narrow width and depth of parcels • Isolated from urban transportation system • May trigger capacity improvements for McVay Highway in Glenwood • Service to this area may be feasible, however there are expected to be some challenges surrounding the 30th Avenue extension and potential for interchange improvements at Interstate 5. • "Difficult to serve with transit except via one-directional route variation form current #92 Lowell/LCC route which only runs 3 trips per weekday." [79] No pedestrian facilities or ADA access in area.
Urban services	The City excluded the **Seavey Loop Fourth Priority lands** from consideration because

[77] Comments received from ODOT Region 2, Area 5 staff Savannah Crawford, email dated June 18, 2013.
[78] At the College View Stakeholder Working Group meeting on March 4, 2015, ODOT staff David Helton stated that the existing 30th Ave. interchange would likely be sufficient to accommodate traffic from future development in the study area concept as mapped on that date.
[79] Comments from meeting with Lane Transit District staff Evans, Schwetz, Luftig and ODOT staff Crawford, June 11, 2013.

conclusion: **Seavey Loop Fourth Priority lands**	these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services extensions and upgrades necessary to serve urban employment uses within the planning period. Lands cannot reasonably be provided with urban services due to physical constraints of distance and topography that preclude reasonable extension of water, wastewater and transportation, including transit, and ability to provide adequate stormwater management. The City has determined that this area is not serviceable to meet Springfield's identified industrial and commercial land use needs during the 20-year planning period ending 2030, as defined in OAR 660-009-0005(9).

IDENTIFY FOURTH PRIORITY LANDS WITH THE SPECIFIED CHARACTERISTICS TO MEET THE IDENTIFIED EMPLOYMENT LAND NEED TO INCLUDE IN THE UGB

The City conducted a public facilities and services analysis to determine whether the *potentially* suitable land identified in the previous step could reasonably be provided with the public water, sewer, stormwater and transportation facilities needed to serve industrial and commercial mixed use employment uses within the 2010-2030 planning period and thus be considered suitable candidate lands to accommodate the identified employment land need deficiency determined under OAR 660-024-0050.

As previously explained in this report for land to be "suitable" for industrial and other employment use under OAR 660-009-0005(12) it must be "serviceable." OAR 660-009-0005(9) states that "'Serviceable' means a city or county has determined that public facilities and transportation facilities, as defined by OAR chapter 660, division 11 and division 12, currently have adequate capacity for development planned in the service area where the site is located or can be upgraded to have adequate capacity within the 20-year planning period."

As previously explained in this report Goal 11 requires public facilities to be planned to support types and levels of urban facilities and services appropriate for Springfield's needs and requirements, consistent with the comprehensive plan. Springfield's need is for the types and levels of public facilities and services appropriate and necessary to support the needs of urban industrial and commercial uses generally and manufacturing and office employment sites specifically.[80] Goal 11 requires public facilities and services to be provided "*in a timely, orderly and efficient arrangement.*" Goal 14 requires cities to evaluate changes to their UGB considering "*orderly and economic provision of public facilities and services.*"

As previously explained in this report requirements under OAR chapter 660, division must be considered at this stage in the UGB Alternatives Analysis to ensure that the amendment of the comprehensive plan to add urbanizable lands to the UGB is supported by adequate planned transportation facilities in a manner that is consistent with applicable transportation planning

[80] Springfield's Target Industries are listed and explained in detail in the CIBL/EOA.

requirements in OAR chapter 660, division 12. The City is expanding the UGB to designate suitable land for industrial and commercial development, therefore suitable candidate lands added to the UGB must provide for the relevant transportation needs: movement of goods and services to support industrial and commercial development planned for pursuant to OAR chapter 660, division 9 and Goal 9 (Economic Development);[OAR 660-012-0030 (1)(c)] and movement of workforce employees to and from the workplace, including needs of the transportation disadvantaged.

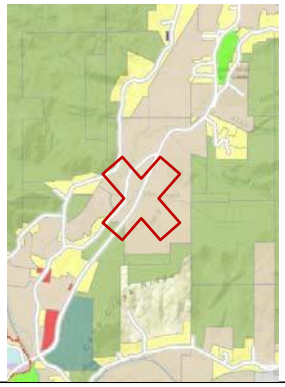
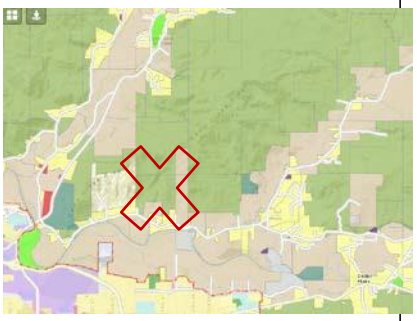
Just as the TSP must "evaluate potential impacts of system alternatives that can reasonably be expected to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology;"[OAR 660-012-0035] the City's UGB study carefully examined and compared alternative candidate growth areas to determine which alternative(s) can reasonably be expected to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology."

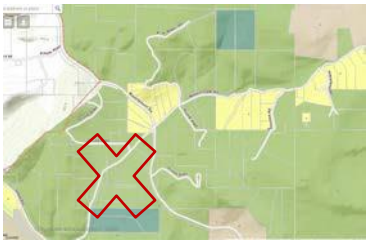
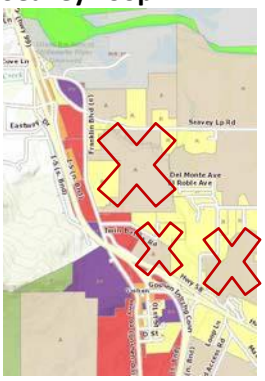
The transportation system must "support urban development by providing types and levels of transportation facilities and services appropriate to serve the land uses identified in the acknowledged comprehensive plan." [OAR 660-012-0035(3)(a)]. The City is expanding the UGB to designate suitable land for industrial and commercial development, therefore suitable candidate lands added to the UGB must be located where the relevant transportation needs can be provided: movement of goods and services to support the industrial and commercial employment development planned for pursuant to OAR chapter 660, division 9 and Goal 9 (Economic Development), and movement of workforce employees to and from the workplace, including needs of the transportation disadvantaged. [OAR 660-012- 0030(1)(b)]

The City evaluated alternative candidate lands to consider the advantages and disadvantages of moving goods and service, workforce employees, including needs of the transportation disadvantaged via the existing and planned transportation system to minimize adverse economic, social, environmental and energy consequences. [OAR 660-012-0035(3)(c)]. The City accomplished this by measuring and comparing distance to candidate sites via existing and planned routes.

To address OAR 660-012-0005 (41) *"Vehicle Miles of Travel (VMT),* the City considered the VMT advantages and disadvantages of moving goods and service, workforce employees, including needs of the transportation disadvantaged via the existing and planned transportation system [OAR 660-012-0005(41)]when it evaluated alternative candidate lands. The City accomplished this by measuring and compared distance to candidate sites via existing and planned routes, assuming build out of the planned system. This is to germane to the evaluation of serviceability because urban transit service is required for a city of Springfield's size, to ensure that new jobs can be accessible to that transportation disadvantaged and as an important means to reducing VMT. Thus, ability to reasonably provide public transit service to new urban areas is a critical and necessary component of serviceability in this case. The City, in consultation with Lane Transit District staff, considered whether extending public transit service to candidate expansion areas can reasonably be expected to be feasible to meet the identified transportation needs in a safe manner and at a reasonable cost with available technology.

Table 18: Fourth priority land excluded based upon specific land needs [ORS 197.298(3)(a)]		
Far East 	**West Jasper/Mahogany** 	**Clearwater**
South Hills 	**Wallace Creek** 	

Table 19: Fourth priority land excluded: public facilities constraints [ORS 197.298(3)(b)]		
McKenzie View 	**Mohawk** 	**Oxbow/Camp Creek** 

Far East	Wallace Creek	Seavey Loop
		

ORS 197.298 (1)(b) Goal 14 Location Factor 3 and Factor 4 – Fourth Priority Lands Analysis

To continue its evaluation of *potentially* suitable land sites to satisfy the employment land need deficiency, the City applied Goal 14 Factor 3 to evaluate the **North Gateway, McKenzie View, Mohawk, Oxbow/Camp Creek, North Springfield Highway, Far East, West Jasper/Mahogany, Clearwater, Wallace Creek, Mill Race and Seavey Loop** areas based on comparative ESEE consequences (Goal 14, Boundary Location, Factor 3), and based on compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4).

As previously noted, DLCD staff Gordon Howard provided an outline of the steps to be followed to exclude or include land:

- Exclude lands that are not buildable[81]
- Exclude lands based upon specific land needs (197.298(3)(a));
- Exclude lands based upon inability to reasonably provide urban services due to physical constraints (197.298(3)(b));
- Include lower priority lands needed to include or provide services to urban reserve lands (197.298(3)(c));
- **Exclude lands based upon analysis of comparative ESEE consequences (Goal 14, Boundary Location, Factor 3);**
- **Exclude lands based upon analysis of compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4)**

The City addressed Goal 14 Location Factor 3 as part of the ORS 197.298 evaluation process after making a determination of which fourth priority lands were potentially suitable based on parcel size size and lack of constraints, and after identifying potentially suitable parcels within a given geographic area

[81] "Buildable" is a Goal 10 term. It is the City's position that OAR 660-024-0060 (1) requires the City to consider whether sites are "suitable" at this "buildable" stage in the evaluation process.

grouping that could reasonably be serviceable by 2030. Goal 14 Location Factor 3 requires the City to make a determination that fourth priority parcels of land selected to be included in an urban growth boundary (UGB) will result in better environmental, social, energy, and economic (ESEE) consequences than the other lands of equal priority considered in this step and other alternative sites that were considered for inclusion and rejected. Under a Goal 14 Factor 3 analysis regarding public facilities and services, a local government may consider relative difficulty and cost differences between urbanizing alternative sites and may consider whether the amount of potentially suitable land within a geographic area could reasonably justify the extension of public infrastructure.

EVALUATE FOURTH PRIORITY LAND HAVING THE SPECIFIED CHARACTERISTICS TO MEET THE IDENTIFIED EMPLOYMENT LAND NEED

In the next step the City applied Goal 14, Boundary Location, Factor 3 and 4 to compare fourth priority lands under ORS 197.298.

- Exclude lands based upon analysis of comparative ESEE consequences (Goal 14, Boundary Location, Factor 3);

- Exclude lands based upon analysis of compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4)

Goal 14, Boundary Location, Factor 3 ESEE Consequences

In addition to information comparing ESEE consequences in the preceding sections of this report, the following section provides additional evidence and findings to address and compare the ESEE consequences of expanding the UGB to include alternative candidate lands. This section of the report explains how the City compared the ESEE consequences of urbanizing potentially suitable and serviceable candidate lands. The City reasoned that the following topics and facts are relevant to its comparative evaluation of candidate lands. Since relevant topics address multiple Environmental, Economic, Social and Energy consequence, ESEE consequences are addressed by topic.

Geologic Hazards

As previously stated, given that several of the UGB Preliminary Study Area groupings examined by the City are within, surrounded by or are accessible only by lands with steeply sloped topography, the City referenced data in the Oregon Department of Geology and Mineral Industries (DOGAMI) online interactive geohazard map to identify areas where landslide hazards have been documented. The City considered the DOGAMI SLIDO data for the purposes of informing subsequent steps in the analysis: 1) determination of suitability of land for urban growth including but not limited to physical factors involved when developing sites 5 acres and larger to accommodate specific types of industrial and commercial employment land uses to meet Springfield's employment land needs; and 2) examination and comparison of the ESEE consequences of urbanizing lands within the each priority category. As previously stated, the City's review of The DOGAMI SLIDO map data identified the presence of

documented landslide hazards and relatively higher landslide susceptibility including Very High, High, and Moderate in the vicinity of UGB Preliminary Study Area groupings: McKenzie View A, B, Mohawk A, B and C, Oxbow/ Camp Creek, Far East, South Hills, Wallace Creek and Seavey Loop B and C and Seavey Loop/Goshen. There exists an increased likelihood that mapped hazard locations will have landslides in the future compared to areas without mapped hazards.

The City's review of The DOGAMI SLIDO map data identified no documented landslide hazards or relatively lower landslide susceptibility (Low to Moderate) in the UGB Preliminary Study Areas Jasper Bridge A and B, West Jasper/Mahogany, Clearwater, Mill Race, and North Gateway. North Springfield Highway study area grouping has one mapped historically active landslide and low to moderate landslide susceptibility.

The presence of landslide hazards influence future urbanization patterns by potentially increasing risk to public health, safety and welfare both onsite and offsite of the parcels of land being developed and/or by imposing constraints that could preclude development or contribute to the infeasibility of developing a particular site to accommodate the types of particular industrial and other employment uses identified in the CIBL/EOA. Although the City did not identify the presence of landslide hazards as an absolute development constraint for the purposes of the Commercial and Industrial Lands Inventory, the City considered areas with known landslide hazards as comparatively less "suitable" to meet the need for large site industrial and commercial mixed use employment site needs when it determined suitability of land for urban growth including but not limited to physically developing sites 5 acres and larger to accommodate specific types of industrial and commercial employment land uses to meet Springfield's employment land needs; and when it examined and compared the ESEE consequences of urbanizing lands with or without known landslide hazards within the second priority category.

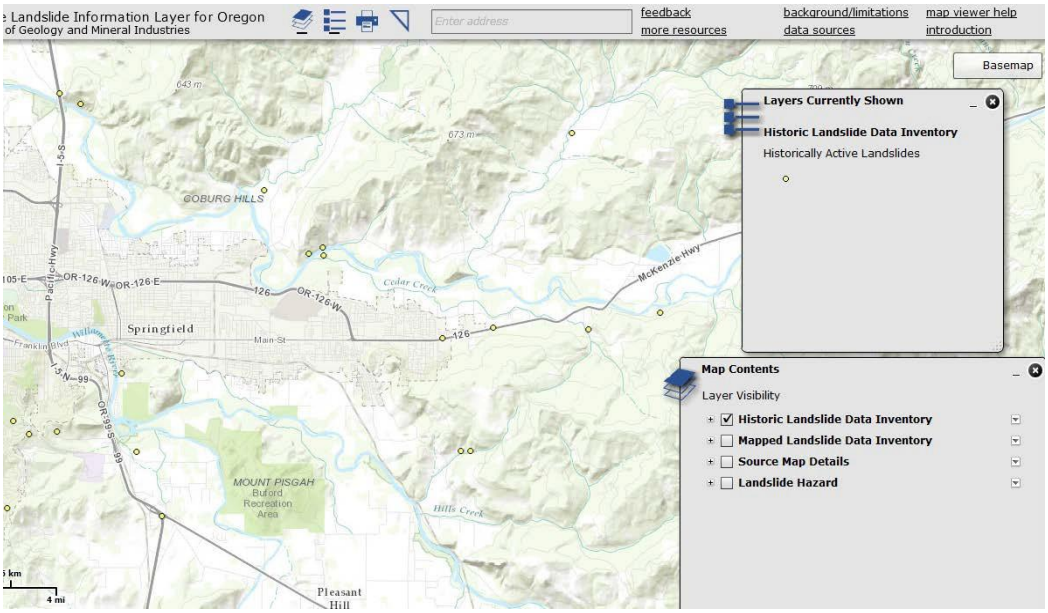
The intensification of development associated with urbanization would require site grading and excavation to construct large site urban employment uses and to extend the infrastructure needed to serve development. Such grading and excavation may not be physically or economically feasible or advisable in areas of known instability, and such site development may not be achievable under the standards of the City's Development Code Hillside Development District.[82]

For purposes of the ESEE social and economic comparison, the City finds that when urbanization and development occurs in hillside areas with terrain known to be landslide-susceptible, greater losses are likely to result than when urbanization and development occurs in areas with terrain not known to be landslide-susceptible.

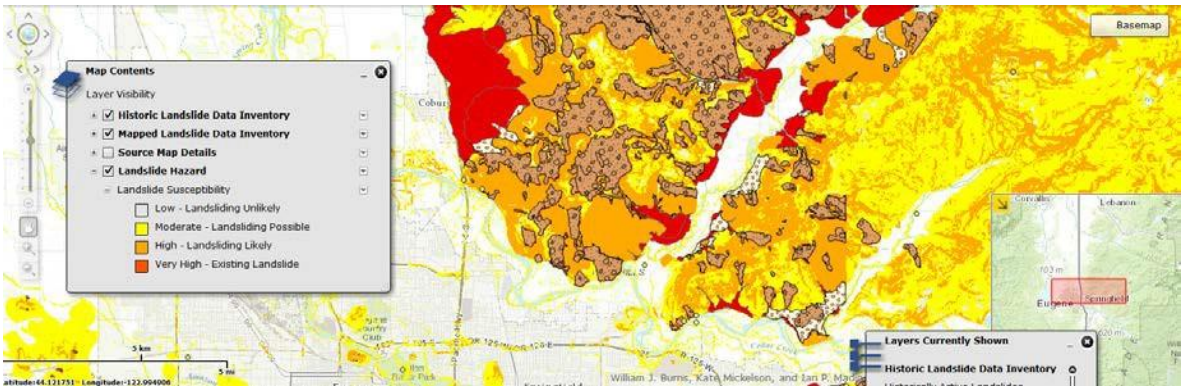
For purposes of the ESEE economic consequences comparison, the City finds that urbanization and development occur in hillside areas with terrain known to be landslide-susceptible will be more costly to

[82] Springfield Development Code Section 3.3-500 Hillside Development Overlay District is applied in residential zoning districts above 670 feet elevation or to development areas below 670 feet in elevation where any portion of the development area exceeds 15 percent slope. Development standards address special street grade and grading plan standards, and geotechnical report requirements to address geological conditions of the site.

meet more rigorous engineering, architectural and construction requirements than urbanization and development outside of areas with terrain not known to be landslide-susceptible.



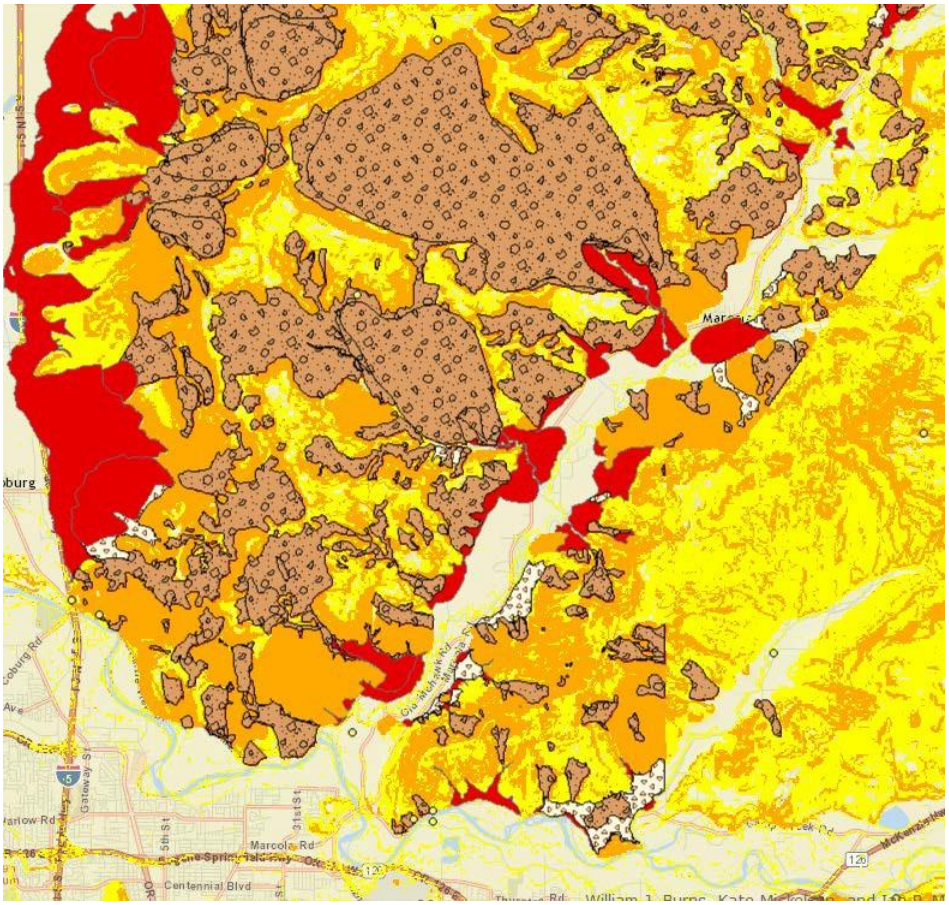
DOGAMI SLIDO maps[83] of the Coburg Hills area indicate the presence of existing and historic landslides throughout the Coburg Hills, north of Springfield and the McKenzie River. For example, as shown in the following detail from the map, the hills are generally mapped with landslide hazards susceptibility ratings of "Very high – existing landslide," "High - landsliding likely," and "Moderate – landsliding possible."



DOGAMI SLIDO Coburg Hills landslide hazard area: **McKenzie View B**, **Mohawk A, B and C and Oxbow/ Camp Creek** Preliminary Study Area groupings

[83] DOGAMI SLIDO viewer, http://www.oregongeology.org/sub/slido/
The website states: *"Although the data have been processed successfully on a computer system at the Oregon Department of Geology and Mineral Industries (DOGAMI), no warranty expressed or implied is made regarding the accuracy or utility of the data on any other system or for general or scientific purposes, nor shall the act of distribution constitute any such warranty. This disclaimer applies both to individual use of the data and aggregate use with other data. We also urge you to pay careful attention to the contents of the metadata with these data and to the compilation process and limitations described therein. The Oregon Department of Geology and Mineral Industries shall not be held liable for improper or incorrect use of the data described and/or contained herein. Data are not intended for site-specific investigations."*

DOGAMI SLIDO maps[84] of the Coburg Hills area indicate the presence of landslide hazards in the near vicinity of the **McKenzie View A, B**, **Mohawk A, B and C** and **Oxbow/ Camp Creek** Preliminary Study Area groupings and adjacent resource lands.

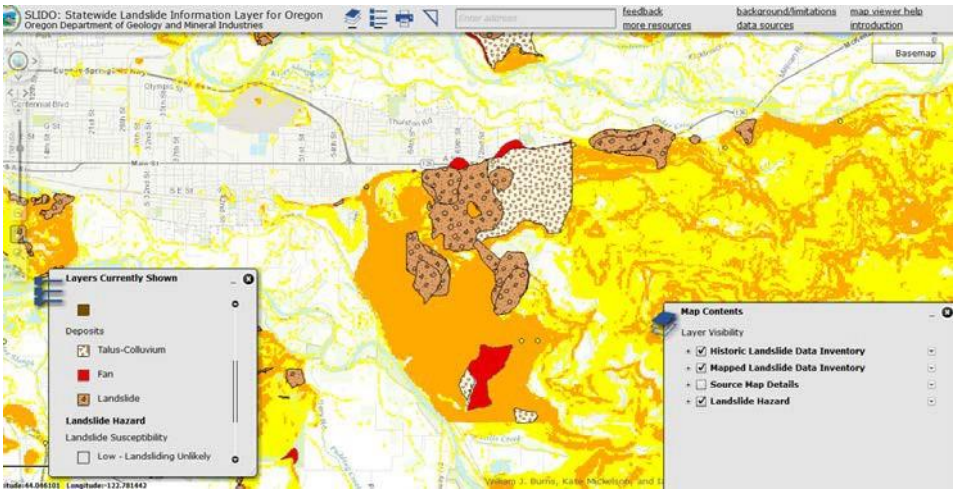


Detail: DOGAMI SLIDO **McKenzie View A, B**; **Mohawk A, B and C;** and **Oxbow/Camp Creek** areas

DOGAMI SLIDO maps[85] of the South Hills area indicate the presence of high landslide hazards and landslides in the near vicinity of the **Wallace Creek** Preliminary Study Area grouping.

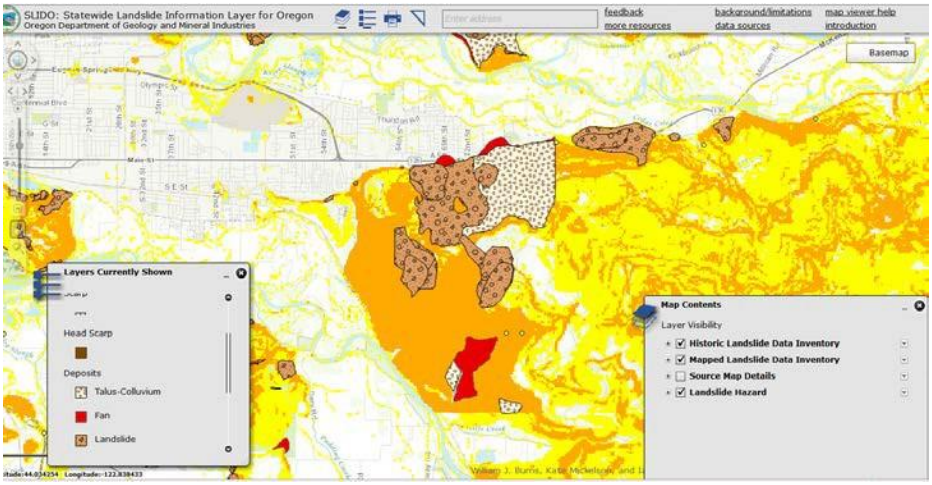
[84] Ibid.

[85] Ibid.

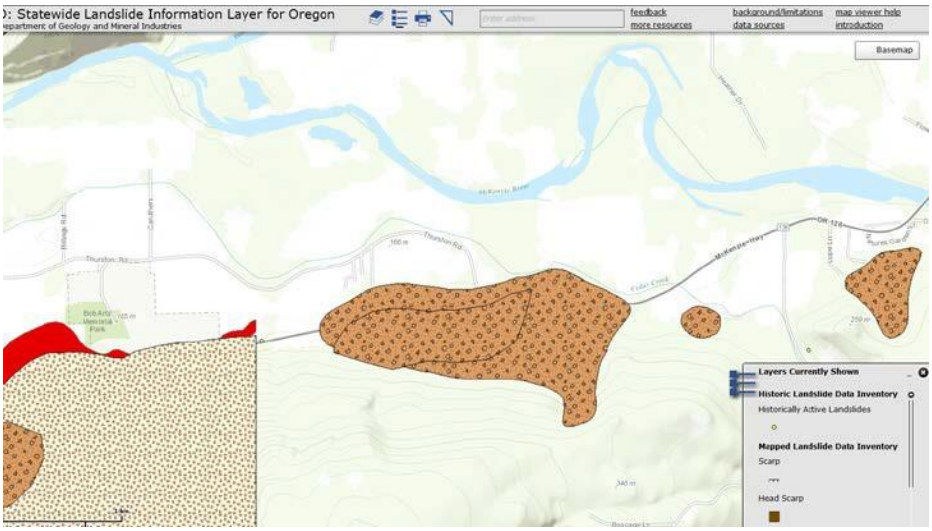


Detail DOGAMI SLIDO **Wallace Creek** landslide hazard area

DOGAMI SLIDO maps[86] of the South Hills area indicate the presence of landslide hazards in the near vicinity of the **Far East Springfield** and **South Hills** Preliminary Study Area groupings



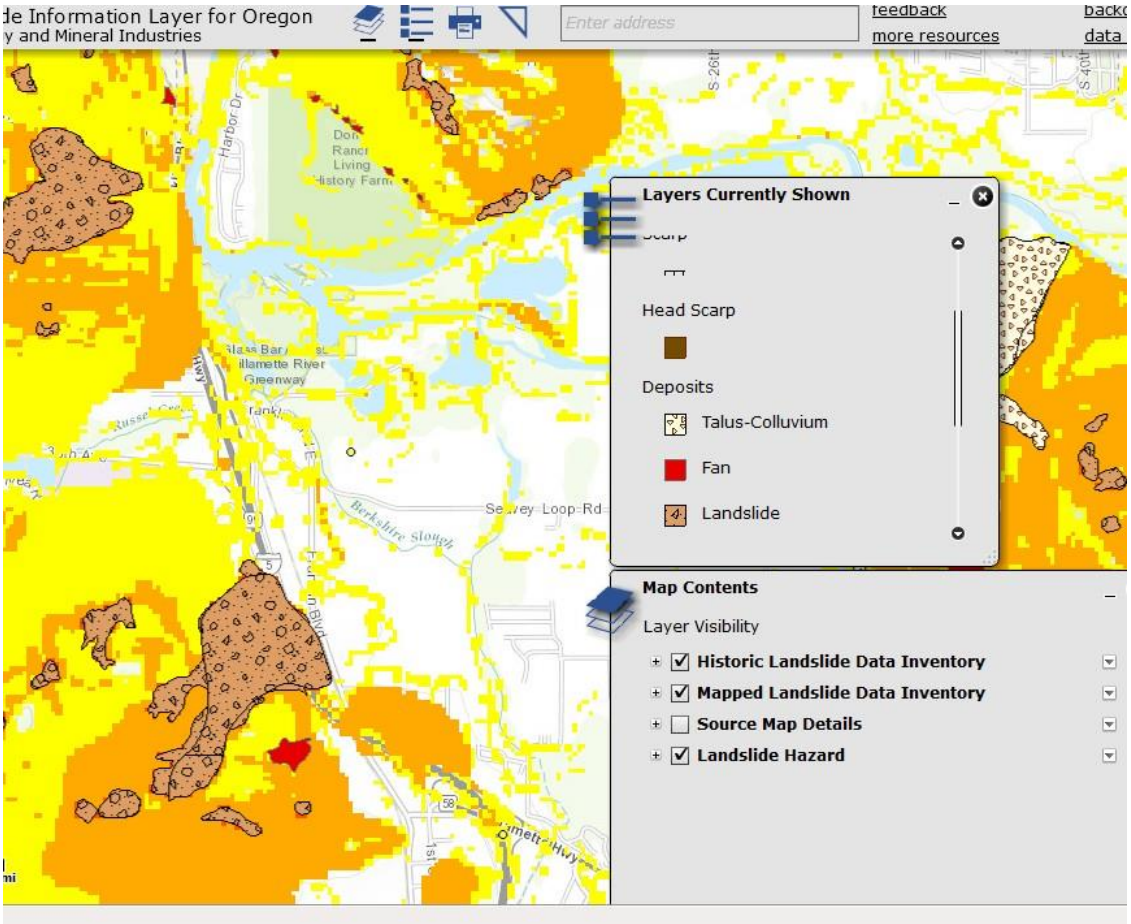
[86] Ibid.



Detail: DOGAMI SLIDO **Far East** landslide hazard area

DOGAMI SLIDO maps[87] of the area southwest of the UGB indicate the presence of landslide hazards in the near vicinity of the **Seavey Loop B** and **C Exception Area** Preliminary Study Area groupings and adjacent resource lands.

[87] Ibid.



DOGAMI SLIDO **Seavey Loop B** and **C** mapped landslide hazard areas

The City applied the following criteria when it evaluated and compared transportation related impacts and ESEE consequences of urbanizing alternative locations. The City reasoned that the following criteria and facts are relevant to its comparative evaluation of candidate lands:

Transportation Impacts Related to Distance from City and Major Transportation Facilities
Location of area causes conflicts with State Planning Goals and local plan policies related to maintaining efficient, compact urban form by causing comparatively substantial additional vehicle miles travelled to and from new employment center land uses.

Location and physical constraints of area causes conflicts with Federal, State or Local policies regarding safety or performance standards of the transportation system, including freight mobility, roadway, transit, bicycle and pedestrian facilities.
A more distant location of an area from urban infrastructure and services results in a stronger likelihood that urbanization will not be provided with inadequate emergency access.

A location requiring a river crossing results in a stronger likelihood that urbanization will not be provided with inadequate emergency access.

A development project that results in vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact.

Generally, development projects that locate within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor may be presumed to cause a less than significant transportation impact. Similarly, development projects that decrease vehicle miles traveled in the project area compared to existing conditions may be considered to have a less than significant transportation impact.

Vehicle miles traveled is an appropriate metric to evaluate a project's transportation impacts.

Comparative assessment of ESEE impacts associated with certain transportation projects must address the potential for induced travel. Adding additional lane miles to serve more distant areas may induce increased automobile and truck travel, and vehicle miles traveled, compared to existing conditions, and may be presumed to cause transportation environmental impacts.

Transportation projects that reduce, or have no impact on, vehicle miles traveled may be presumed to cause a less significant transportation environmental impact.

If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations (such as homes, employment and services), area demographics, etc.

For the purposes of the UGB Alternatives Analysis, the City assumed that the target industrial and other employment uses requiring sites 5 acres and larger — as identified in the EOA — would induce travel and transportation-related impacts similar to the travel and impacts of existing industrial and other employment uses in Springfield — such as the employment sectors located in the International Way Campus Industrial district.

For the purposes of the UGB Alternatives Analysis, the City assumed that adding or improving additional lane miles to serve more distant areas may induce increased automobile and truck travel, and vehicle miles traveled, compared to existing conditions, and may be presumed to cause transportation environmental impacts relative to trip length, as identified in the City's Public Facilities Analysis.

ESEE Environmental/Air Quality/Energy Consequences

Accounting for vehicle miles traveled (VMT) is a measure used in connection with long range planning, or as part of the analysis of a project's greenhouse gas emissions or energy impacts. Methods of some estimating vehicle miles traveled include: [88]

> *"**Trip-based assessment** of a project's effect on travel behavior counts VMT from individual trips to and from the project. It is the most basic, and traditionally most common, method of counting VMT. A **tour-based assessment** counts the entire home-back-to-home tour that includes the project.*
> *Both trip- and tour-based assessments can be used as measures of transportation efficiency, using denominators such as per capita, per employee, or per person-trip.*
> *…a tour-based assessment of VMT is a more complete characterization of a project's effect on VMT. In many cases, a project affects travel behavior beyond the first destination. The location and characteristics of the home and workplace will often be the main drivers of VMT. For example, a residential or office development located near high quality transit will likely lead to some commute trips utilizing transit, affecting mode choice on the rest of the tour.*
>
> *Characteristics of an office project can also affect an employee's VMT even beyond the work tour. For example, <u>a workplace located at the urban periphery, far from transit, can cause an employee to need to own a car, which in turn affects the entirety of an employee's travel behavior and VMT</u>. For this reason, when estimating the effect of an office development on VMT, it may be appropriate to consider total employee VMT."*(emphasis added)

Based on this reasoning and for the purposes of this ESEE analysis, the City assumed that the more distant the exception area is located from the City, the greater the distance the potential urban employment site/workplace will located from the City and from transit. This greater distance is more likely to cause an employee to need to own a car, which in turn affects the entirety of an employee's travel behavior and VMT.

Urbanizing areas more distant from the City, will result in relative increases in VMT and transportation impacts within the existing UGB as more employees need to own a car to reach their more distant workplaces.

Designating land for employment centers within or proximate to multimodal transportation networks will have the consequence of adding new users to systems. This can cause mixed cumulative impacts:

> *"When evaluating impacts to multimodal transportation networks, lead agencies generally should not treat the addition of new users as an adverse impact. Any travel-*

[88] "Technical Advisory of Evaluating Transportation Impacts in CEQA," California Governor's Office of Planning and Research, Jan. 20, 2016, pp. 13-14.

efficient infill development is likely to add riders to transit systems, potentially slowing transit vehicle mobility, but also potentially improving overall destination proximity. Meanwhile, such development improves regional vehicle flow generally by loading less vehicle travel onto the regional network than if that development was to occur elsewhere." [89]

"Increased demand throughout a region may, however, cause a cumulative impact by requiring new or additional transit infrastructure. Such impacts may be best addressed through a fee program that fairly allocates the cost of improvements not just to projects that happen to locate near transit, but rather across a region to all projects that impose burdens on the entire transportation system.[90]

"Projects that would likely lead to an increase in VMT, (including for purposes of accurately estimating GHG and other impacts that are affected by VMT), generally include:

- *Addition of through lanes on existing or new highways, including general purpose lanes, HOV lanes, peak period lanes, auxiliary lanes, and lanes through grade-separated interchanges."*

Projects that would <u>not</u> likely lead to a substantial or measureable increase in VMT, generally include:

- *Rehabilitation, maintenance, replacement and repair projects designed to improve the condition of existing transportation assets (e.g., highways, roadways, bridges, culverts, tunnels, transit systems, and assets that serve bicycle and pedestrian facilities) and that do not add additional motor vehicle lanes.*
- *Roadway shoulder enhancements to provide "breakdown space," otherwise improve safety or provide bicycle access.*
- *Addition of an auxiliary lane of less than one mile in length designed to improve roadway safety.*
- *Installation, removal, or reconfiguration of traffic lanes that are not for through traffic, such as left, right, and U-turn pockets, or emergency breakdown lanes that are not utilized as through lanes.*
- *Addition of roadway capacity on local or collector streets provided the project also substantially improves conditions for pedestrians, cyclists, and, if applicable, transit*
- *Conversion of existing general purpose lanes (including ramps) to managed lanes or transit lanes, or changing lane management in a manner that would not substantially decrease impedance to use*
- *Reduction in number of through lanes, e.g. a "road diet"*

[89] Ibid. p. 26.
[90] "Technical Advisory of Evaluating Transportation Impacts in CEQA," California Governor's Office of Planning and Research, https://www.opr.ca.gov/docs/Revised_VMT_CEQA_Guidelines_Proposal_January_20_2016.pdf

- *Grade separation to separate vehicles from rail, transit, pedestrians or bicycles, or to replace a lane in order to separate preferential vehicles (e.g. HOV, HOT, or trucks) from general vehicles*
- *Installation, removal, or reconfiguration of traffic control devices, including Transit Signal Priority (TSP) features*
- *Traffic metering systems*
- *Timing of signals to optimize vehicle, bicycle or pedestrian flow*
- *Installation of roundabouts*
- *Installation or reconfiguration of traffic calming devices*
- *Adoption of or increase in tolls*
- *Addition of tolled lanes, where tolls are sufficient to mitigate VMT increase (e.g., encourage carpooling, fund transit enhancements like bus rapid transit or passenger rail in the tolled corridor)*
- *Initiation of new transit service*
- *Conversion of streets from one-way to two-way operation with no net increase in number of traffic lanes*
- *Removal of off-street parking spaces*
- *Adoption or modification of on-street parking or loading restrictions (including meters, time limits, accessible spaces, and preferential/reserved parking permit programs).*
- *Addition of traffic wayfinding signage*
- *Rehabilitation and maintenance projects that do not add motor vehicle capacity*
- *Any lane addition under 0.3 miles in length, including addition of any auxiliary lane less than 0.3 miles in length"* [91]

Causes of Induced VMT. Induced VMT occurs where roadway capacity is expanded in a congested area, leading to an initial appreciable reduction in travel time. With lower travel times, the modified facility becomes more attractive to travelers, resulting in the following trip-making changes, which have implications for total VMT:

- *Longer trips. The ability to travel a long distance in a shorter time increases the attractiveness of destinations that are further away, increasing trip length and VMT.*
- *Changes in mode choice. When transportation investments are devoted to reducing automobile travel time, travelers tend to shift toward automobile use from other modes, which increases VMT.*
- *Route changes. Faster travel times on a route attract more drivers to that route from other routes, which can increase or decrease VMT depending on whether it shortens or lengthens trips.*
- *Newly generated trips. Increasing travel speeds can induce additional trips, which increases VMT. For example, an individual who previously telecommuted or purchased goods on the internet might choose to accomplish those ends via automobile trips as a result of increased speeds.*
- *Land Use Changes. Faster travel times along a corridor lead to land development further along that corridor; that development generates and attracts longer trips, which increases VMT. Over several years, this component of induced VMT can be substantial, e.g. approximately half of the total effect on VMT.*

[91] Ibid.

These effects operate over different time scales. For example, changes in mode choice might occur immediately, while land use changes typically take a few years or longer." [92]

ESEE Energy Consequences

"Targets to reduce existing VMT to curb greenhouse gases, and other pollutants do not translate directly into VMT thresholds for individual projects for numerous reasons, however, including the following:

Some, though not all, of the emissions reductions needed to achieve those targets will be accomplished by other measures, including increased vehicle efficiency and decreased fuel carbon content.

New projects alone will not sufficiently reduce VMT to achieve those targets, nor are they expected to be the sole source of VMT reduction.

Interactions between land use projects, and also between land use and transportation projects, existing and future, together affect VMT."[93]

Because regional location is the most important determinant of VMT, locating vehicular trip-inducing urban land uses in travel efficient locations is widely recognized as one effective means of reducing VMT, and thus reducing energy consumption associated with transportation. Based on this accepted fact, it is reasonable for the City to assume that the more remote the location from Springfield, the higher the VMT associated with development would result. For the purposes of the UGB Alternatives Analysis, the City assumed locations farther from Springfield —as identified by relative trip length in the City's Public Facilities Analysis — would result in increased VMT and increase in impacts associated with VMT compared to areas closer to Springfield.

The relative proximity of the North Gateway and Mill Race sites to the region's existing and planned public frequent transit network system is the basis for the City's assumption that those two locations provide travel-efficient locations relative to the other alternatives studied and thus would result in comparatively higher percentage of commute trips by transit and fewer vehicular commute trips to employment centers.

ESEE Economic Consequences

OAR 660-009-0005 (3) states:

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

[92] Ibid
[93] Ibid.

The Goal 9 rule's definition of "industrial" clearly recognizes that "Industrial uses may have external impacts on surrounding uses;" and that industrial uses typically and traditionally may locate in locations where other industrial activities are occurring.

The City's description of candidate study areas identifies the land uses surrounding each candidate area.

For the purposes of the UGB Alternatives Analysis, the City assumed that candidate study areas sharing boundaries with lands designated, zoned and developed with urban industrial and other employment uses have comparative economic advantages over areas that do not share boundaries with lands designated, zoned and developed with urban industrial and other employment uses, because aggregating employment uses results in greater efficiencies in infrastructure, services and transportation. [OAR 660-009-0005 (3)] The North Gateway and Mill Race sites abut industrial lands inside the UGB.

As previously stated, increased distance from Springfield increases the public costs to construct maintain and operate infrastructure and services. Developing sites closer to Springfield decreases the public costs to construct maintain and operate infrastructure and services.

As previously stated, increased distance from Springfield increases travel times for transporting goods and services, and employee travel time, resulting in relatively higher cost to businesses and employees.

Social Consequences Comparison

The majority of second priority exception lands in the vicinity of the UGB are designated and zoned for and developed with rural residential uses, thus exception land parcel(s) are already developed and committed to rural uses, primarily rural residential uses.

Expanding the UGB to include any of the exception areas studied would encompass lands designated and zoned for and developed with rural residential uses that lack the characteristics of needed employment sites.

When exceptions areas were designated by Lane County in the Lane Rural Comprehensive Plan, and zoned Rural Residential, those lands were committed to rural uses in accord with the administrative rules in Division 4 interpreting the Goal 2 exception process in effect at the time they were designated. As stated in OAR 660-004-0010, *"The exceptions process is generally applicable to all or part of those statewide goals that prescribe or restrict certain uses of resource land, restrict urban uses on rural land, or limit the provision of certain public facilities and services."*

Including developed Rural Residential exception or marginal lands in the UGB that are not suitable to accommodate Springfield's needed industrial and commercial mixed use employment uses on large sites 5 acres or larger and 20 acres or larger, would make those lands "urbanizable." The City would be required to redesignate and rezone rural residential lands for employment use. In many, but not all circumstances in the study area, this would come at a greater social cost and would be more likely to

result in land use conflicts between existing rural residential uses and industrial and commercial mixed use employment uses.[94]

If the City were to expand the UGB to include Third or Fourth priority resource lands in remote locations from Springfield, unsuitable intervening resource, exception and marginal rural lands remaining outside the UGB would likely be affected by the siting of urban industrial and commercial uses. Industrial and commercial uses are not typically considered compatible with residential uses, and land use buffers would typically be required, reducing the overall developable acreage of a site. In many, but not all circumstances in the study area, this would come at a greater social cost and would be more likely to result in land use conflicts between existing rural residential uses and industrial and commercial mixed use employment uses.

Goal 14 Location Factor 3 Conclusions – Fourth Priority Lands Analysis

The City's analysis of comparative ESEE consequences (Goal 14, Boundary Location, Factor 3) confirmed exclusion of lands in the previous steps:

- **This step confirmed exclusion of McKenzie View land** (cost, remote, contrary to compact urban development, no transit, landslide hazards, farmland)
- **This step confirmed exclusion of Oxbow/Camp Creek** (cost, remote, contrary to compact urban development, no transit, landslide hazards, farmland)
- **This step confirmed exclusion of Mohawk** (cost inhibitive infrastructure upgrades to cross river, distance, unsuitable location, remote, contrary to compact urban development, no transit, landslide hazards, farmland)
- **This step confirmed exclusion of North Springfield Highway** (environmental, flooding, stormwater discharge regulations, habitat)
- **This step confirmed exclusion of West Jasper/Mahogany (cost/benefit, cost inhibitive infrastructure upgrades, no transit, environmental, habitat, social, farmland)**
- **This step confirmed exclusion of Clearwater** (no transit, social, farmland)
- **This step confirmed exclusion of Wallace Creek lands on the basis of** (cost/benefit, landslide hazards, cost inhibitive infrastructure upgrades, contrary to compact urban development, no transit)
- This step confirmed exclusion of **Far East** (cost/benefit, cost inhibitive infrastructure upgrades, farmland, contrary to compact urban development, no transit, landslide hazards)
- This step confirmed exclusion of **Seavey Loop** (contrary to compact urban development, cost inhibitive infrastructure upgrades, cost/benefit, social, farmland)

The City determined that the cost to serve potentially suitable lands within these areas is not feasible within the planning period.

[94] See Record LRP 2009-00014 documenting input from Seavey Loop neighbors regarding the City's consideration of the College View study area

The City determined that these areas cannot reasonably be served with adequate public facilities by 2030 and thus are not suitable to meet the identified employment land need.

The City finds that the long-term environmental, economic, social and energy consequences resulting from the use at these site with measures designed to reduce adverse impacts are significantly more adverse than would typically result from the same proposal being located in other areas.

Goal 14 Factor 4: Compatibility of proposed urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB

Goal 14 Factor requires the City to address how development of urban industrial and commercial employment uses within the UGB expansion area would be compatible with nearby agricultural and forest activities occurring on farm and forest land outside the UGB. Given that ORS 197.298 requires the City to site urban uses on farmland as the fourth priority, and given that the City has no suitable Second or Third Priority lands to accommodate the employment land need, the City must meet a high bar to demonstrate that the farmland it chose to include in the UGB expansion was carefully and thoughtfully selected after a thorough comparison of all alternative areas within the same priority to consider how future urbanization to accommodate target industry employment uses would be compatible/incompatible with nearby agricultural and forest activities occurring on farm and forest land outside the UGB.

The City reasoned that the following facts are relevant to the Factor 4 comparison because maintaining a compact urban form reduces opportunities for land use conflicts between urban industrial and commercial employment uses and agricultural and forest activities.

The North Gateway and Mill Race suitable employment lands are contiguous with the Springfield City limits. Expanding the UGB on land contiguous to the City will result in a more compact, efficient urban form with relatively less potential for conflict with surrounding agricultural and forest activities occurring on farm and forest land outside the UGB than would result from expanding in alternative sites. Compact, efficient urban form is consistent with Metro Plan policy and Oregon law and Goal 14 Factors 1 and 2.

The result of expanding onto more distant and non-contiguous lands would a “leapfrogging” development pattern over, past or through unsuitable agricultural or forest land, inducing addition or expansion of urban corridors through the rural Lane County landscape. The purpose of a UGB is to separate urbanizable from rural land. Establishment of corridors to serve distant development creates or increases edge effects. Edges, where they occur along and though farm or forest land areas, inherently create or increase physical opportunities for land use conflicts and contribute to urban sprawl. In addition to being inefficient and contrary to the Oregon Statewide Planning Goals, development of urban corridors through farm or forest land by extending and upgrading infrastructure through intervening unsuitable lands between the City limits and suitable sites would be more likely to

create or increase compatibility impacts with nearby agricultural and forest activities occurring on farm and forest land outside the UGB including but not limited to increased volume and speed of vehicle trips on rural roads, inducement of land use changes from rural to urban on intervening unsuitable lands, and land value speculation that has deleterious effects on local viability of farming.

The City's Public Facilities Analysis provides a summary of transportation and infrastructure extensions or improvements that would be needed to serve each alternative area, including the approximate length of service extensions and location of transportation system improvements that would be triggered by development in each area.

Urbanization of the North Gateway and Mill Race suitable employment lands will not affect forestry activities because the sites do not share edges with lands designated Forest in the Lane Rural Comprehensive Plan. Transportation and infrastructure extensions or improvements will not require crossing lands designated Forest.

Urbanization of Mill Race suitable employment lands will not affect agriculture activities because the sites do not share edges with lands designated Agriculture in the Lane Rural Comprehensive Plan. Transportation and infrastructure extensions or improvements will not require crossing lands designated Agriculture.

Urbanization of the North Gateway suitable employment lands will move the urbanizable edge farther north and thus has potential to affect agriculture activities occurring on lands between the proposed new edge of the UGB (at Sprague Road) and the McKenzie River. Agriculture uses in the area north of Sprague Road include the former Bloomer's Nursery (closed in 2016), and staff observed livestock grazing activity on the tracts between Sprague Road and the McKenzie River. Trucks, contractor and customer vehicles have operated on Sprague Road to access Bloomer's over the past years and no deleterious impacts to agriculture uses north of Sprague Road have been identified through the City's multi-year public involvement process. The City's Public Facilities Analysis identifies a need to improve Sprague Road to serve North Gateway suitable employment lands. Transportation impacts generated by development and any mitigation required to address those impacts are determined at time of plan amendment and zone change, annexation and the City development approval process in coordination with ODOT and other agencies and with input from potentially affected parties.

Urbanization of the North Gateway suitable employment lands will not affect agriculture activities occurring on lands on the opposite side of the McKenzie River because the river serves as a buffer between land uses. Additional buffering will be provided between the river and future development sites by the Natural Resource plan designation applied to the floodway area. The Transportation and infrastructure extensions or improvements to serve the North Gateway suitable employment lands will not require crossing the McKenzie River or adjacent rural lands.

Urbanization of Mill Race suitable employment lands will not affect agriculture activities south of the Willamette River (Seavey Loop) because the river and intervening public, parks and open space lands serves as a buffer.

The City confirmed its exclusion of other fourth priority lands based upon analysis of compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4) through the Alternatives Analysis process, as summarized in Tables 13 and 15 of this report. Table 13 General Description of Fourth Priority land provides maps and text to identify the location of each alternative area studied by the City in relationship with surrounding lands designated Agriculture or Forest in the Lane Rural Comprehensive Plan and the relative proximity of each area to the City. Table 17 Fourth Priority Land Public Facilities and Services Analysis Summary describes the facilities that would be needed to serve each area.

- This step confirmed exclusion of McKenzie View
- This step confirmed exclusion of Hayden Bridge
- This step confirmed exclusion of Thurston
- This step confirmed exclusion of Mohawk
- This step confirmed exclusion of Oxbow/Camp Creek
- This step confirmed exclusion of Far East
- This step confirmed exclusion of Clearwater
- This step confirmed exclusion of West Jasper/Mahogany
- This step confirmed exclusion of Jasper Bridge
- This step confirmed exclusion of South Hills
- This step confirmed exclusion of Wallace Creek
- This step confirmed exclusion of Seavey Loop

The City contacted USDA NRCS and Oregon Department of Agriculture staff to request technical assistance regarding statutes and administrative rules that are relevant when addressing soil capability classification[95] and relevant resources to consult as the City addressed Factor 4.

OAR 660-033-0030(2)

> *"When a jurisdiction determines the predominant soil capability classification of a lot or parcel it need only look to the land within the lot or parcel being inventoried. However, whether land is "suitable for farm use" requires an inquiry into factors beyond the mere identification of scientific soil classifications. The factors are listed in the definition of agricultural land set forth at OAR 660-033-0020(1)(a)(B). This inquiry requires the consideration of conditions existing outside the lot or parcel being inventoried. Even if a*

[95] As recommended by USDA and OR Dept. of Ag staff, City staff consulted the most recent Census of Agriculture and special tabulations from the census developed by Oregon State University, the Oregon Department of Agriculture, the United States Department of Agriculture's NRCS, the Oregon State University Extension Service and the county assessor's office to obtain data to determine the nature of the existing commercial agricultural enterprise within the area for the purposes of this study.

lot or parcel is not predominantly Class I-IV soils or suitable for farm use, Goal 3 nonetheless defines as agricultural "Lands in other classes which are necessary to permit farm practices to be undertaken on adjacent or nearby lands." A determination that a lot or parcel is not agricultural land requires findings supported by substantial evidence that addresses each of the factors set forth in 660-033-0020(1)."

As previously stated, the City excluded fourth priority lands from consideration on the basis of soil capability classification.

- The City excluded **North Gateway — North of Sprague Road** lands comprising predominantly Class II soils on the basis of agricultural capability classification.
- The City excluded unconstrained **McKenzie View** lands comprising predominantly Class I and II soils on the basis of agricultural capability classification.
- The City excluded unconstrained **Oxbow/Camp Creek** lands comprising predominantly Class I, Class II and Class III High Value Farmland soils on the basis of agricultural capability classification.
- The City excluded unconstrained **Hayden Bridge** lands comprising predominantly Class II soils on the basis of agricultural capability classification.
- The City excluded unconstrained **Mohawk** lands comprising predominantly Class I and II soils on the basis of agricultural capability classification.
- The City excluded unconstrained **North Springfield Highway** lands comprising predominantly Class II soils on the basis of agricultural capability classification.
- The City excluded unconstrained **Thurston** lands comprising predominantly Class I and II soils on the basis of agricultural capability classification.
- The City excluded unconstrained **Far East — North of Highway 126** lands comprising predominantly Class I and II soils on the basis of agricultural capability classification.
- The City excluded unconstrained **South Hills** lands comprising predominantly Class III High Value Farmland soils on the basis of agricultural capability classification.
- The City excluded unconstrained **West Jasper/Mahogany** lands comprising predominantly Class II soils on the basis of agricultural capability classification.
- The City excluded unconstrained **Jasper Bridge** lands comprising predominantly Class I and II soils on the basis of agricultural capability classification.
- The City excluded unconstrained **Clearwater** lands comprising predominantly Class II soils on the basis of agricultural capability classification.
- The City excluded unconstrained **Wallace Creek** lands comprising predominantly Class II and III High Value Farmland soils on the basis of agricultural capability classification.
- The City excluded unconstrained **Seavey Loop** lands comprising predominantly Class II, Class III High Value and Class IV Prime Farmland soils on the basis of agricultural capability classification.

As previously stated, the City also excluded lands comprising soils of higher priority for expansion in the Clearwater, West Jasper/Mahogany, Wallace Creek, Thurston, Far East, Mohawk, Oxbow/Camp Creek and South Hills areas (identified in Table 13) on the basis of Specific Land Needs [ORS 197.298(3)(a)]; on

the basis of inability to reasonably provide urban services due to physical constraints [ORS 197.298(3)(b)]; and on the basis of comparative ESEE consequences.

Another, additional reason the City chose not to expand the UGB to include several non-contiguous parcels with soils of higher priority in the Clearwater, West Jasper/Mahogany, Wallace Thurston, Far East, Mohawk and Oxbow/Camp Creek areas (identified in Table 13), even though those parcels are not predominantly Class I-IV soils, is because the City reasoned that those lands are suitable and will remain suitable for farm use consistent with their Agriculture designation and Exclusive Farm Use zoning in the Lane Rural Comprehensive Plan because those lands are "*are necessary to permit farm practices to be undertaken on adjacent or nearby lands,*" consistent with the definition of agricultural land set forth at OAR 660-033-0020(1)(a)(B). The City assumed, based on the input it received from property owners, farmers, citizens and agriculture experts over the multi-year public involvement process, that the agricultural lands it excluded are — and will remain through the 2010-2030 planning period — more "suitable for farm use as defined in ORS 215.203(2)(a), taking into consideration soil fertility; suitability for grazing; climatic conditions; existing and future availability of water for farm irrigation purposes; existing land use patterns; technological and energy inputs required; and accepted farming practices;" than the two areas (North Gateway UGB to Sprague Road and Mill Race) the City chose to include in the UGB to meet its specific employment land needs.

The City reasoned that the agricultural lands it excluded will remain "necessary to permit farm practices to be undertaken on adjacent or nearby agricultural lands."

The City reasoned that the agricultural lands it excluded will continue to support Commercial Agricultural Enterprise consisting of farm operations that will contribute in a substantial way to the area's existing agricultural economy; and help maintain agricultural processors and established farm markets.

The City reasoned that the agricultural lands it excluded will continue to support farm use as defined in ORS 215.203 and OAR Division 33 on lands designated Agriculture and zoned Exclusive Farm Use in the Lane Rural Comprehensive Plan by maintaining viable use of abutting high value farmland parcels [OAR 660-033-0030(2), and by maintaining contiguous connected blocks of farmland through the planning period.

The City reasoned that the following facts and criteria are relevant to comparing the consequences of urbanization related to agriculture and forest uses within the locations it evaluated for inclusion in the UGB:

- Class I and II and high value or prime III or IV agricultural soils exist on and immediately abutting the areas.
- Agriculture area is physically buffered from the urban area by the river.
- Nonfarm (residential uses) exist throughout the area and there is little documented history of conflicts with agricultural operations in the area.

- Tract and field sizes are appropriate for the character of agriculture in the area.
- Existing land use regulations – EFU and exceptions zoning limit the ability to further divide area agricultural lands
- Opportunities for the direct marketing and promotion of agricultural products exists. Farm stands, U-picks and small farms producing high-value products for sale to the urban market are not uncommon and are increasing in the area. This lends itself to greater opportunities for farms to produce crops that cater to the ever-growing demand for locally produced food and other agricultural products.
- Comparative length of shared edge with the UGB.
- Comparative length of needed urban services extensions and improvements that would be required through or along bordering farm or forest lands.

Based on balanced consideration of the factors addressed above, the City reasoned that the potentially suitable Fourth Priority sites it excluded are better suited for the continued production of agricultural and forest products within the planning period because those areas are relatively well buffered and protected from urbanization by their distance, by their location within large blocks of farm and/or forest land, by their location on the opposite side of the McKenzie or Willamette Rivers, and by their relatively remote locations accessed via rural roads of narrow width restricted by geology and slopes and via weight-restricted bridges.

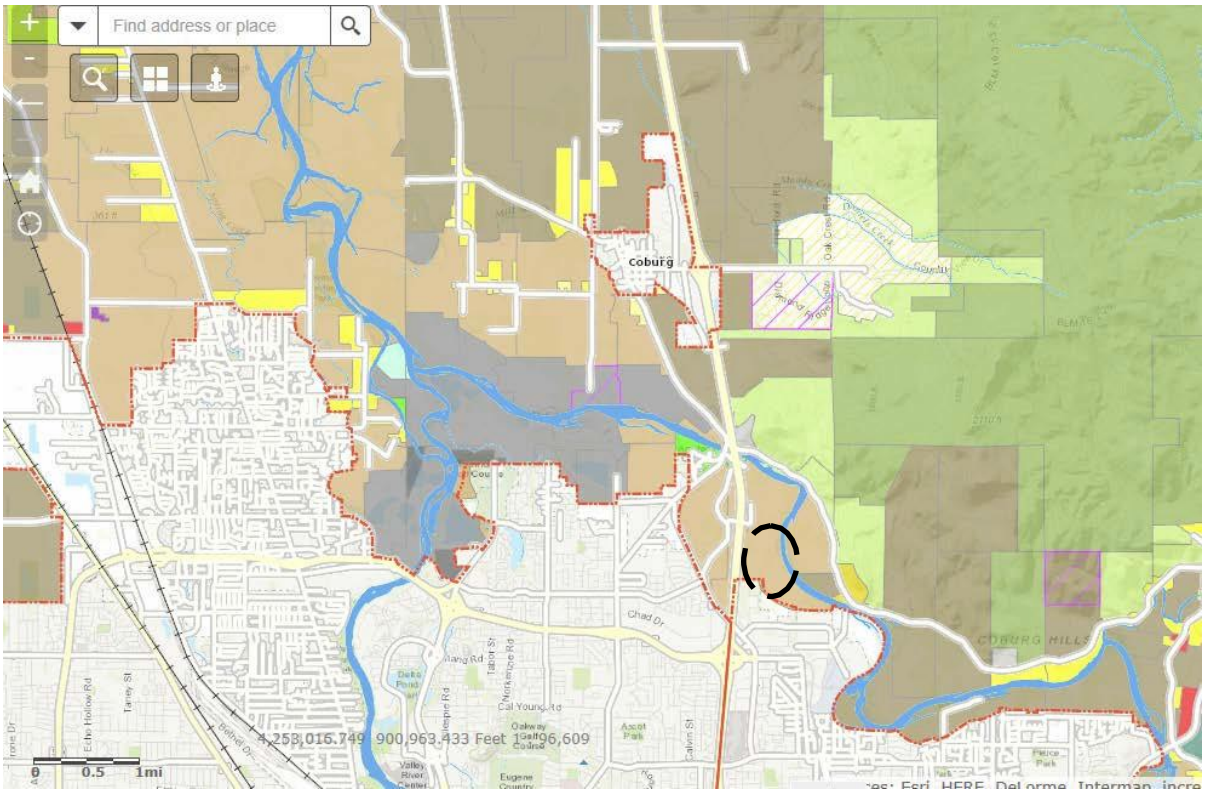
Based on balanced consideration of the factors addressed above, and based on evidence in the record, the City reasoned that the agricultural lands it included — North Gateway UGB to Sprague Road and Mill Race — are comparatively less suited for the continued production of agricultural products within the planning period because these areas are not well buffered from the City. Both areas abut the City limits and existing industrial land developed with industrial uses.

Any expansion of the UGB inherently alters the pattern of land uses in a given area as urbanizable lands develop over time. The City's analysis and the conclusions reached are reasonable and supported by ample evidence. The following maps are included to illustrate how the City's UGB expansion will result in a minimal overall alteration of the pattern of land uses in the Metro area, with an emphasis on how the expansion could amount and affect pattern of agricultural land uses in the region.

The following map[96] depicts the location of the proposed North Gateway UGB expansion (214 gross acres including right of way/132.1 unconstrained employment land acres) in relationship to resource land designated Agricultural (tan color) in the LRCP between the Springfield, Coburg and Eugene UGBs/urbanizable lands. The map shows how this block of farmland is already split (and rendered less viable) by Interstate Highway 5.

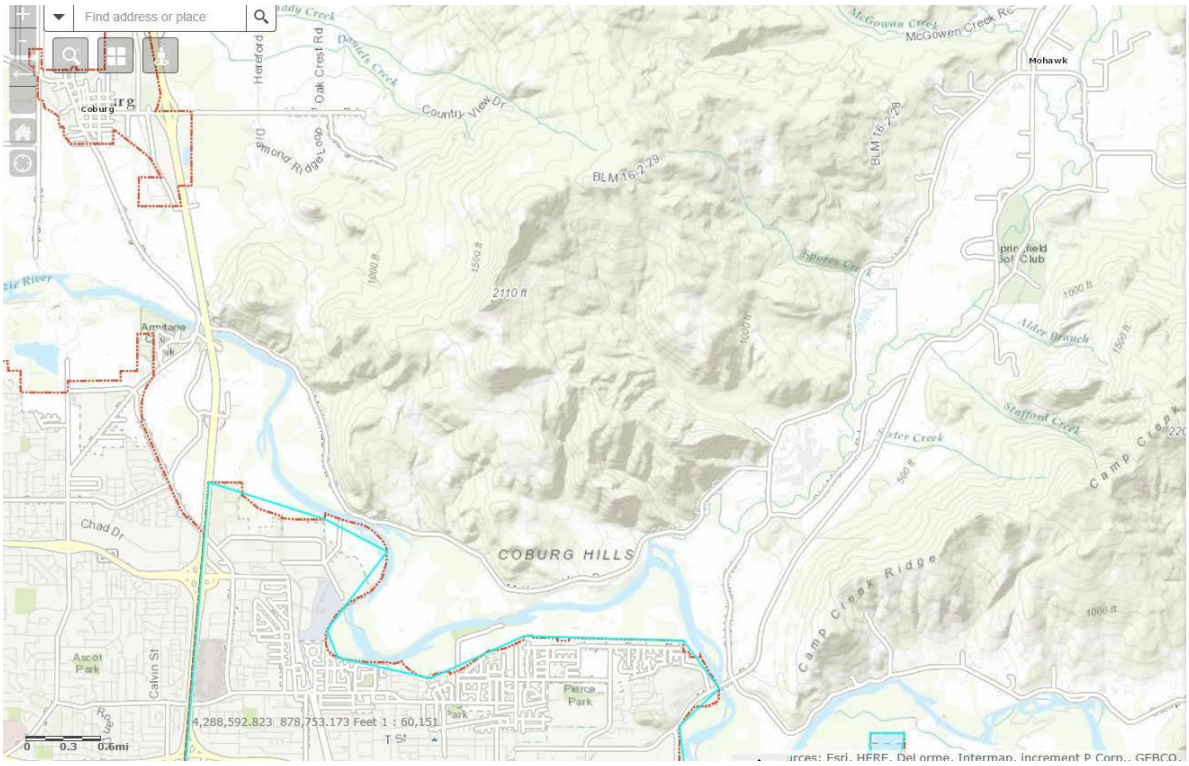
[96] http://lcmaps.lanecounty.org/LaneCountyMaps/ZoneAndPlanMapsApp/index.html

Sprague Road Overpass



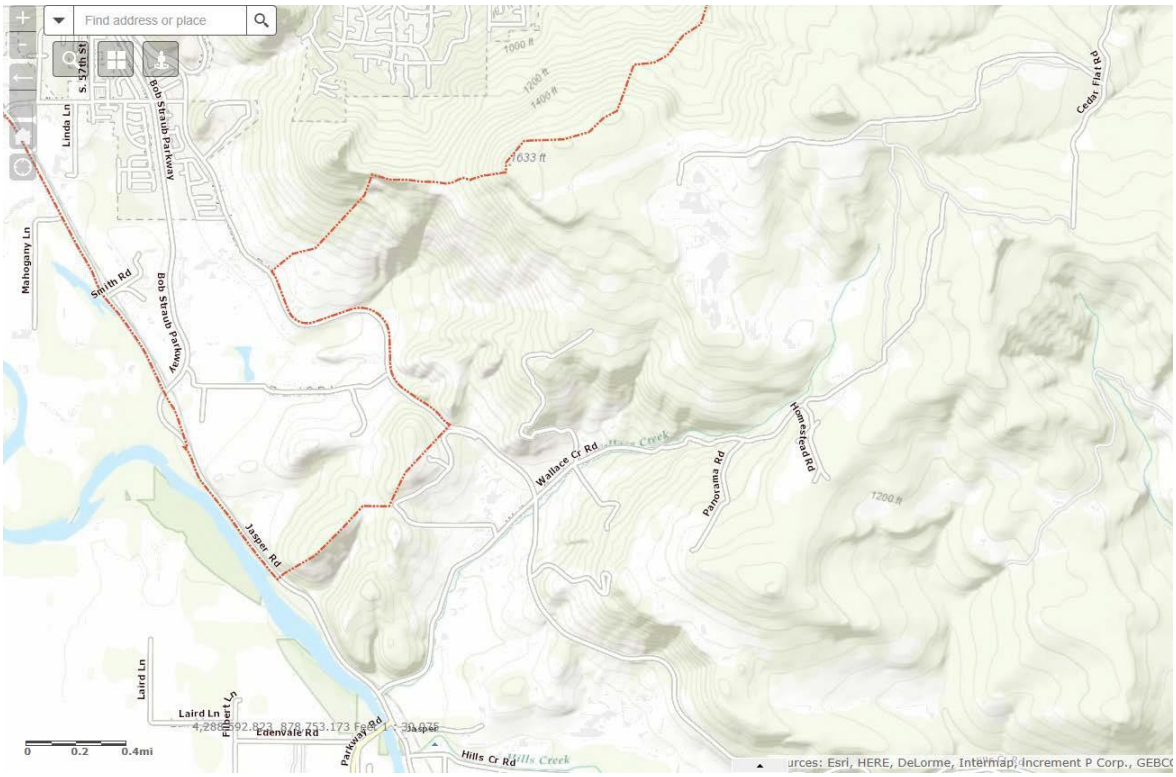
Goal 14 Locational Factor 4: Compatibility with Agriculture

Proposed North Gateway UGB employment land expansion relative to farmland north and west of Springfield UGB – farmland shown in beige color



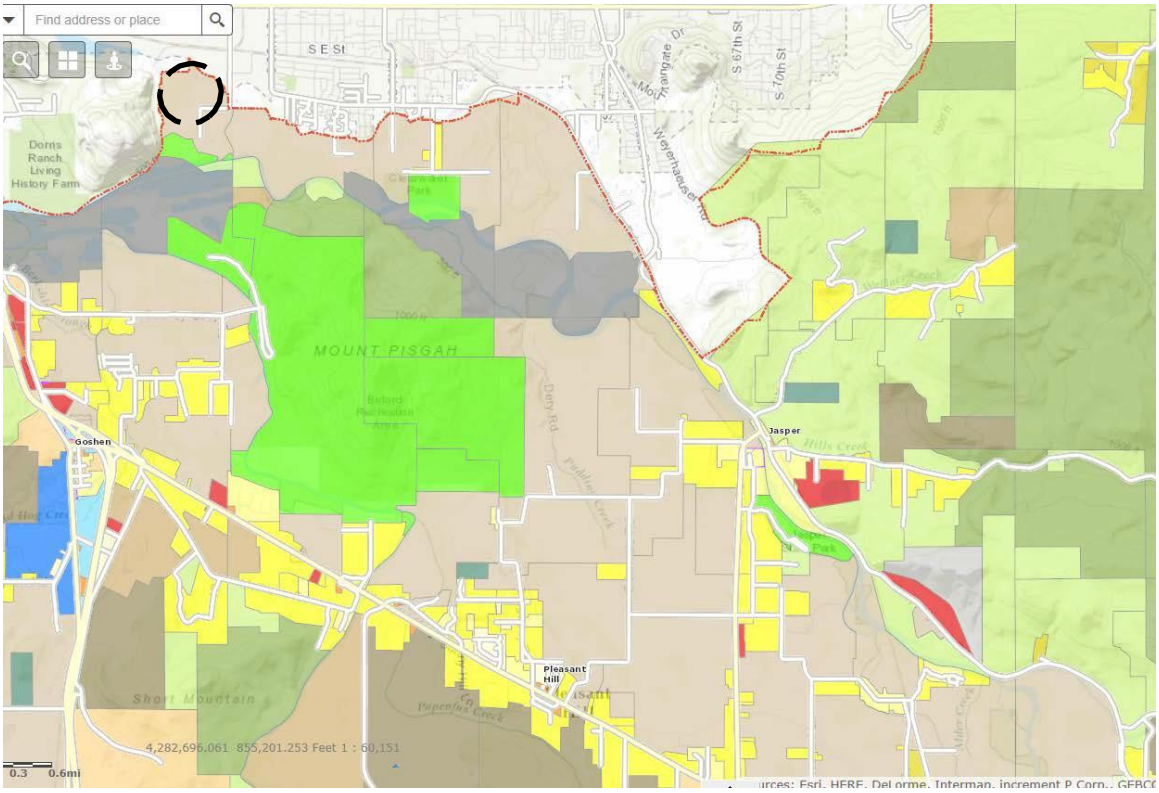
Topographic Constraints North of McKenzie River:
McKenzie View, Mohawk, and Camp Creek Study Areas[97]

[97] http://lcmaps.lanecounty.org/LaneCountyMaps/ZoneAndPlanMapsApp/index.html



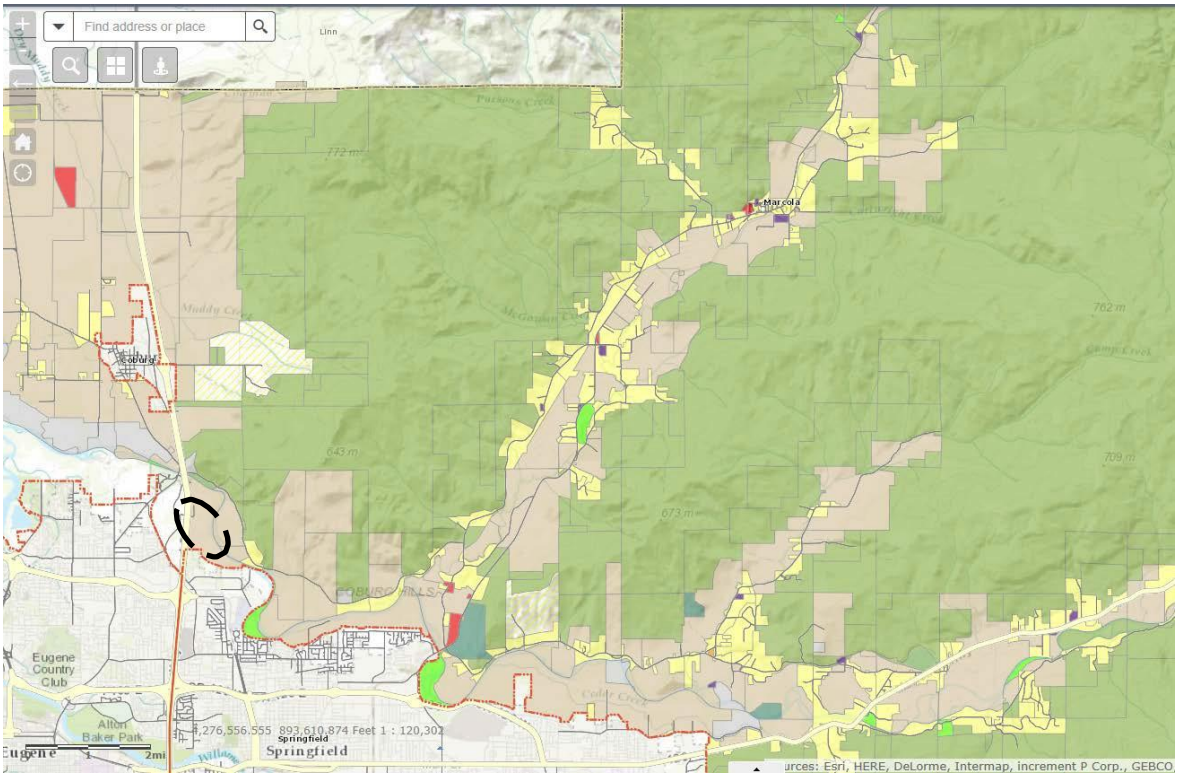
Topographic Constraints Southeast of UGB:
Wallace Creek Study Area[98]

[98] http://lcmaps.lanecounty.org/LaneCountyMaps/ZoneAndPlanMapsApp/index.html



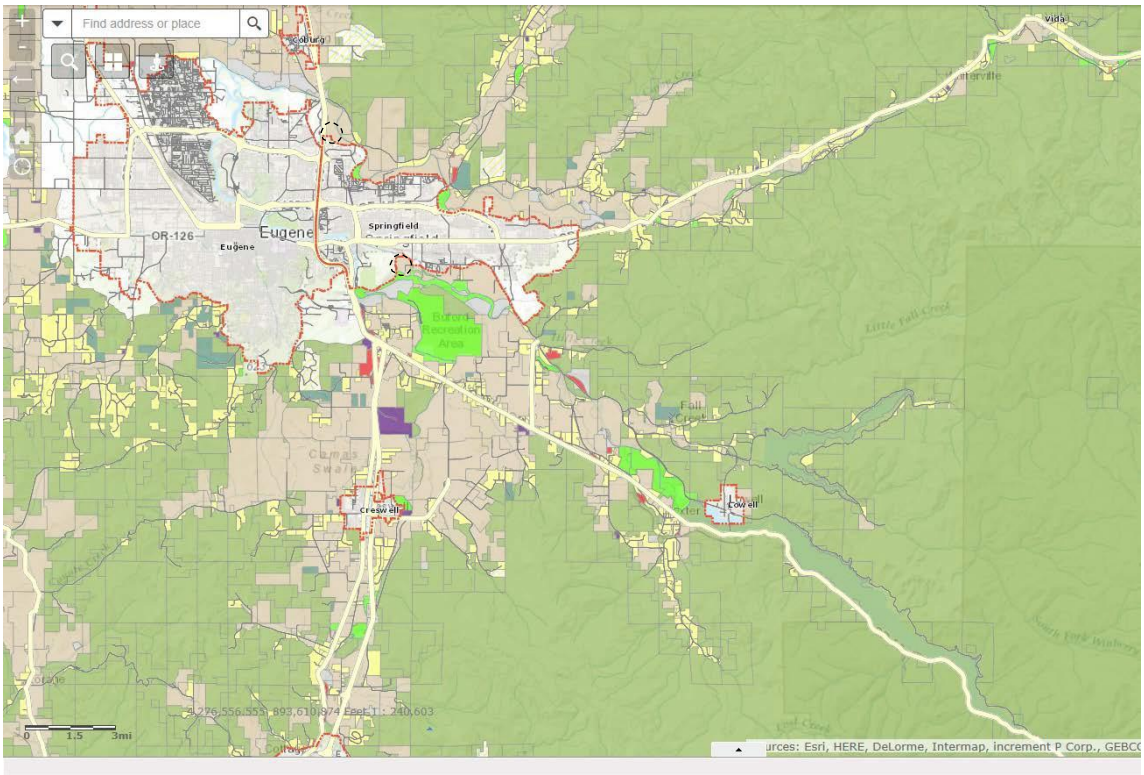
Goal 14 Locational Factor 4: Compatibility with Agriculture

Proposed Mill Race UGB employment land expansion relative to farmland south of Springfield UGB – farmland shown in beige color



Goal 14 Locational Factor 4: Compatibility with Agriculture and Forest Resource Lands

North Gateway UGB Employment Land Expansion



Goal 14 Locational Factor 4: Compatibility with Agriculture and Forest Resource Lands
Farmland Surrounding Eugene-Springfield Metro Area within Lane County – shown in beige color, Forestland shown in green.

◌ = indicates Springfield UGB Employment Land Expansion

The preceding map depicts the location of land designated Agriculture in the Lane Rural Comprehensive Plan. The larger areas of land designated Agriculture are located south of the Springfield UGB.

The City's analysis excluded the areas listed in Table 20 from further consideration.

Table 20: Fourth Priority Agriculture and Forest Land Excluded on the basis of specific land needs [ORS 197.298(3)(a)], Public Facilities [ORS 197.298(3)(b)], and ESEE Consequences

North Gateway (North of Sprague)	McKenzie	View	Oxbow/Camp	Creek
Hayden Bridge	Mohawk		North Springfield Highway	
Far East	South Hills		West Jasper/Mahogany	
Wallace Creek	Jasper	Bridge		
Seavey Loop Area 1	Thurston		Clearwater	

As explained in this report, and supported by the substantive and evidence in the record, the City conducted a complete and thorough alternatives analysis of fourth priority lands adjacent to the UGB that was not limited to those lots or parcels that abut the UGB, but also included all land in the vicinity of the UGB that has a reasonable potential to satisfy the identified need deficiency. [OAR 660-024-0060(4)].

The City determined that fourth priority lands adjacent to or in the vicinity of the UGB cannot reasonably accommodate the identified employment land need. The City's decision was reached after identifying and evaluating resource land in the vicinity of the UGB, after identifying and evaluating potentially suitable parcels 5 acres or larger without absolute development constraints; after consultation with experts to identify needed site characteristics for the target industrial and commercial/mixed use industries identified in the CIBL/EOA that require sites 5 acres and larger and 20 acres and larger, including public facilities needs for industrial and commercial land development; after consultation with public facility and services providers including ODOT; after evaluation of exception land location and topography as it relates to the ability to extend public facilities of sufficient physical capacity and structure to support provision of urban services including water and wastewater mains and public transit service to UGB expansion areas; in consideration of applicable policies in the *Springfield Development Code* Chapter 5.7-100 for annexing territory; after consideration of infrastructure and transportation needs to serve lands already in the UGB as identified in the applicable *Eugene-Springfield Metropolitan Area Public Facilities and Services Plan,* applicable transportation system plans, facilities master plans and capital improvement programs; and after consideration of the City's development standards and requirements for urban development in the *Springfield Development Code* Chapters 3.2-300, 3.2-400, 3.2-600, 3.3-300, 3.3-300, 3.3-400, 3.3-500, 3.3-1000, Chapter 4 in its entirety and the *Springfield Engineering Design Standards and Procedures Manual*.

After a thorough evaluation, the City determined that urbanization would be directed to North Gateway UGB to Sprague Road and to Mill Race because these lands provide comparative advantages over other areas and therefore can "reasonably accommodate" the identified specific industrial and commercial-mixed use land need for sites 5 acres and larger.

After conducting a thorough parcel-by-parcel evaluation of *potentially* suitable parcels that could reasonably accommodate the identified specific industrial and commercial-mixed use land need for sites 5 acres and larger and that are potentially serviceable due to proximity and lack of topographic or other physical constraints, the City determined that the comparative environmental, economic, social and energy consequences of directing urbanization to these two areas compare favorably to directing urbanization to other lands because land is suitable to meet the site needs of target industries and the amount of unconstrained land is more economically feasible to serve with public water and wastewater facilities on a cost basis.

After conducting a thorough parcel-by-parcel evaluation of the location of the areas in relationship to land designated for agriculture and forestry in the Lane Rural Comprehensive Plan; and after consideration of comparative environmental, energy, economic and social consequences of urbanizing those lands for the purpose of developing industrial and office commercial urban uses [Goal 14

Boundary Location Factor 3]; and after consideration of compatibility of the proposed industrial and office commercial urban uses with nearby agricultural and forest activities occurring on farm and forest land outside the UGB [Goal 14 Boundary Location Factor 4] the City concluded that urbanization of North Gateway UGB to Sprague Road and Mill Race is more economically viable on a service cost basis and is less likely to negatively affect nearby agricultural and forest activities occurring on farm and forest land outside the UGB by extending or expanding new corridors of urban development into areas primarily designated for agricultural and forest use.

Thus, urbanization of the North Gateway UGB to Sprague Road site and Mill Race site compares favorably with other lands the City considered for inclusion in the UGB.

The City's conclusion was reached based on sound reasoning of ample data and is supported by substantial evidence in the record.

Table 21: Springfield UGB Expansion and Land Use Designations

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

Goal 14 Location Factors 1 and 2

In the next step the City applied and balanced Goal 14, Boundary Location Factors 1 and 2 to confirm selection of the parcels to be included in the UGB for industrial and commercial mixed use employment purposes.

<u>Goal 14 Factor 1: Efficient accommodation of identified land needs.</u>

<u>Goal 14 Factor 2: Orderly and economic provision of public facilities and services.</u>

The North Gateway UGB expansion accommodates employment land needs efficiently. The three suitable North Gateway employment sites abut the UGB and City limits and thus do not require inclusion of unsuitable intervening lands. The North Gateway UGB expansion designates 139.4 acres of land in

three contiguous tracts for employment (Urban Holding Area – Employment plan designation). Of the 139.4 acres so designated, 132.1 acres are unconstrained and suitable for development. 7.3 acres comprise waterways, riparian resources, wetlands and slopes >15%. The City assumed that the public streets and facilities needed to serve development will be accommodated within the 139.4 acres designated Urban Holding Area – Employment.

The proximate location and ample size of the area will support efficient urban development of an employment center adjacent to an existing employment center. Two of the three sites about the City's International Way Campus Industrial employment center (existing employers include Royal Caribbean, Symantec, Richardson Sports, Pacific Source, Hawes Investments, and Oregon Medical Labs.)

The North Gateway UGB expansion adds 214 gross acres to the UGB. Gross acreage includes lands the City designated to ensure efficient, appropriate land use, to accommodate existing and planned public facilities, and to limit development to protect important natural resources: 53.3 floodway-constrained acres on two tracts fronting the McKenzie River "Natural Resource;" and 9.7 acres designated Public/Semi Public (EWEB parcel abutting I-5 that is developed with electric facilities and public water wells and Sprague Road right of way). Gross acreage includes 9.9 acres of right of way along Interstate Highway 5. The proposed UGB is along the centerline of the freeway, a consistent northerly extension of the existing centerline UGB.

The Mill Race UGB expansion accommodates employment land needs efficiently. The three suitable employment sites abut the UGB and City limits and thus do not require inclusion of unsuitable intervening lands. The three sites comprise 78.3 suitable, contiguous unconstrained acres, large enough to accommodate a target industry employment use requiring a site size equal to or larger than the average Springfield large site size (63 acres)[99]. The proximate location and ample size of the area will support efficient urban development of an employment center adjacent to an existing Heavy Industrial area.

As shown in the Map: Proposed UGB Expansion Area - Mill Race August 2015 (Ordinance Exhibit A , the City also included the 13 smaller parcels (ranging in size from 0.3 to 9.2 unconstrained acres) that are located between the suitable SUB and Johnson tracts and the publicly owned lands to the south the City is including and designating Public/Semi Public to accommodate existing Willamalane parks and SUB Willamette Well field and treatment plant. The City reasoned that if these lands are not included, they will become entirely surrounded by the UGB. The City reasoned that bringing these "extra" lands that are currently designated Agriculture in the Lane Rural Comprehensive Plan and zoned EFU into the UGB makes better sense than leaving those lands outside the UGB and within Lane County's land use planning jurisdiction. At previous joint work sessions of the Springfield City Council and Lane County in review of the City's UGB amendment, elected officials recommended against leaving "strips" of land in County jurisdiction between the UGB and the river.

Seven of the parcels comprise frontage along South 28th, South M, or South 26th Streets, three roads that will be needed to urbanize the Mill Race area. Thus, portions of these lands may be needed within

[99] EcoNorthwest, Springfield *CIBL/EOA Summary Report*, August 2015, page 16, Characteristics of Large Site Needs.

the planning period to provide additional right of way to enable primary or secondary access and other urban services to the SUB and Johnson employment land tracts when these existing rural roads are improved to urban standards. Existing SUB water lines are located within easements on the parcels fronting 28th Street, South M Street. The City reasoned that the "extra" lands are needed to provide services to the needed suitable tracts to the west and north.

The City also reasoned that additional riparian resource buffers are likely to be required within the Mill Race area that will reduce the developable acreage. As previously stated in the Public Facilities Analysis "the Middle Fork Willamette River is federally classified as critical salmonid habitat and the Springfield Mill Race enhancement project was performed to provide additional salmonid habitat. Stormwater service within this area may require atypical restrictions and solutions and will present significant challenges considering the multiple overlapping regulatory jurisdictions for constructing new stormwater outfalls into the Springfield Mill Race, Gory Creek or Quarry Creek and the limitations regarding on-site stormwater management." The City adopted Urbanization Element policies to address the unique natural resources of the Mill Race area that may require atypical development standards to ensure that development does adversely impact critical drinking water and surface water resources. Thus the "extra" parcels of land are necessary to ensure that the Mill Race area has sufficient land to accommodate the atypical stormwater management facilities that will be required to develop this area in conformance with atypical regulatory restrictions, to protect highly sensitive groundwater or surface water resources and/or to provide additional salmonid habitat mitigation that may be required.

The result of including these parcels "inflates" the City's UGB expansion by 34 "extra" acres of employment land over and above the City's overall land need. The City finds that adding these 34 excess acres is reasonable. The lands will be zoned "Agriculture – Urban Holding Area" to allow continuation of existing rural levels of use. 34 acres is 25% of the total 133.2 acres the City designated for employment. 25% is a reasonable amount of land need to assume for public services.

The City included 373.1 acres of public land within the Mill Race area in the UGB. Those lands are developed with Willamalane parks and public facilities. The City designated these lands Public/Semi Public.

The Mill Race UGB expansion includes 508.1 gross acres. Gross acres include right of way, acres constrained by wetlands, slopes >15%, riparian resource areas and floodway. Of that total, 373.1 acres are designated Public/Semi Public to accommodate existing and planned parks and public water system facilities; 135 acres are designated for employment. 125 of the 135 employment acres are unconstrained and suitable.

The City's Mill Race UGB expansion and its designation of land within the area use land efficiently.

The City's UGB expansion adds approximately 257 suitable acres of employment land on 273 gross acres within two geographic areas – North Gateway and Mill Race.

The City's UGB expansion adds approximately 257 suitable acres of employment land on 273 gross acres designated for employment use to meet the City's employment land need of 223 acres.

In addition to previously meeting all residential needs without expanding the UGB, Springfield will meet all need for industrial and commercial sites 5 acres or less without expanding the UGB.

The City's UGB accommodates identified land needs efficiently.

The City chose sites that will yield a high percentage of unconstrained land that is suitable for development of the target industries employment uses the City seeks to accommodate.

The two employment land areas added to the UGB are contiguous to existing industrial districts already in the UGB and City limits. Thus contiguous annexation to the City is supported, and orderly and economic provision of service extensions and service delivery is enabled.

The City's UGB expansion includes 455 acres of existing publicly-owned land, parks and open space designated Public/Semi Public. These lands were included in the amended UGB at the request of Willamalane and SUB to facilitate orderly and economic management of parks and recreation services, orderly and economic provision of public facilities that may be needed for park and recreation uses or for development of public water system facilities needed to serve Springfield's needs. See also findings under Goal 8, p. 454, p. 426, p. 445 and 466.

ORS 197.298 / Goal 14 Conclusion: In summary, as explained in this report and based on the evidence herein and supported by additional evidence in the record, the City properly applied and followed the prioritization requirements in ORS 197.298 and Goal 14 to the UGB alternatives analysis when it studied, evaluated and selected land which land to be included within the urban growth boundary amendment. The State's acknowledgement of the locally adopted Springfield 2030 Comprehensive Plan and UGB Amendment will provide reasonable opportunities in Springfield for urban commercial and industrial needs for the 2010-2030 period through changes to the urban growth boundary. [ORS 197.712(2)(g)(B)]

The following findings and conclusions support the Commission's affirmation of the proposed Springfield 2030 Comprehensive Plan and UGB amendments as they apply or interpret applicable goals or rules in their review of the subject proposal.

ORS 197.707 Legislative intent states: *"It was the intent of the Legislative Assembly in enacting ORS chapters 195, 196, 197, 215 and 227 not to prohibit, deter, delay or increase the cost of appropriate development, but to enhance economic development and opportunity for the benefit of all citizens.* [1983 c.827 §16]"

ORS 197.712(1) Commission duties states: "*…in carrying out statewide comprehensive land use planning, the provision of adequate opportunities for a variety of economic activities throughout the state is vital to the health, welfare and prosperity of all the people of the state."*

ORS 197.712(2) Commission duties states that when LCDC applies and interprets exisiting goals or rules, the Commission shall implement the following:

(a) Comprehensive plans shall include an analysis of the community's economic patterns, potentialities, strengths and deficiencies as they relate to state and national trends.

(b) Comprehensive plans shall contain policies concerning the economic development opportunities in the community. (emphasis added)

(c) Comprehensive plans and land use regulations shall provide for at least an adequate supply of sites of suitable sizes, types, locations and service levels for industrial and commercial uses consistent with plan policies. (emphasis added)

(d) Comprehensive plans and land use regulations shall provide for compatible uses on or near sites zoned for specific industrial and commercial uses. (emphasis added)

(g) Local governments shall provide:

(B) Reasonable opportunities for urban residential, commercial and industrial needs over time through changes to urban growth boundaries. (emphasis added)

The City's proposed Springfield 2030 Comprehensive Plan and UGB amendments are based on the Economic Opportunities Analysis —*"an analysis of the community's economic patterns, potentialities, strengths and deficiencies as they relate to state and national trends."*

The Springfield Comprehensive Plan Economic Element *"contains policies concerning the economic development opportunities in the community,"* in response to the Economic Opportunities Analysis, prepared and locally adopted to implement the provisions of Goal 9 and OAR Division 9.

The Springfield Comprehensive Plan and UGB, as amended through State acknowledgement of the subject comprehensive plan and UGB amendment proposals, provide for "*at least an adequate supply of sites of suitable sizes, types, locations and service levels for industrial and commercial uses consistent with plan policies,*" including applicable Metro area transportation and public facilities policies.

The City's Urbanization Element policies and "Urban Holding Area – Employment" land use designation protect lands added to the UGB from premature or incompatible interim development and ensure that the lands added to the UGB will *"provide an adequate supply of sites of suitable sizes, types, locations and service levels for industrial and commercial uses consistent with plan policies,* including sites with the required characteristics typically needed *to accommodate specific industrial and commercial uses.* This, the lands the City added to the UGB to meet specific industrial and commercial needs are designated and zoned properly and adequately to retain those lands to accommodate those specific industrial and commercial uses.

The City's application of "Agriculture – Urban Holding Area" zoning to lands added to the UGB designated for specific industrial and commercial uses *provides for compatible interim uses on sites zoned for specific industrial and commercial uses* but does not allow interim uses that would preclude urban development of the land to accommodate the specific industrial and commercial needs identified in the Economic Opportunities Analysis and Economic Element policies.

Implementation of the City's Urbanization Element policies will ensure that lands added to the UGB can reasonably and efficiently provided with urban services including but not limited to public sewer, water

and transportation services, including public transit services to support the land uses contemplated in the comprehensive plan and land use regulations.

Springfield's 2030 Comprehensive plan policies, applicable Metro Plan designations, existing applicable Springfield refinement plan designations and policies, existing Springfield Zoning Map designations, and land use regulations implemented through the Springfield Development Code *provide for compatible uses on or near sites zoned for specific industrial and commercial uses.*

Through previous adoption in 2011 by the Springfield City Council and Lane County of the 2030 Residential Element policies and through implementation of those policies to meet residential land needs for the 2010-2030 planning period without expanding the UGB (2013 Glenwood plan amendments), the local governments have already provided reasonable opportunities for urban residential needs.

Through local adoption by the Springfield City Council and Lane County of the proposed Springfield 2030 Comprehensive Plan and UGB amendments, the local governments are *providing reasonable opportunities for urban commercial and industrial needs over time through changes to* Springfield's *urban growth boundaries.*

As explained in this report and as thoroughly documented through ample evidence provided in the record the Springfield 2030 Comprehensive Plan and UGB amendments are consistent with the applicable provisions of Oregon law.

VII. 2030 Plan Compliance with Other Planning Goals and Metro Plan Policies

Metro Plan Environmental Resources Element

The Environmental Resources Element of the Metro Plan, III-C-1 states:

> *"The Environmental Resources Element addresses the natural assets and hazards in the metropolitan area. The assets include agricultural land, clean air and water, forest land, sand and gravel deposits, scenic areas, vegetation, wildlife, and wildlife habitat. The hazards include problems associated with floods, soils, and geology. The policies of this element emphasize reducing urban impacts on wetlands throughout the metropolitan area and planning for the natural assets and constraints on undeveloped lands on the urban fringe."* (emphasis added)
>
> *"The natural environment adds to the livability of the metropolitan area. Local awareness and appreciation for nature and the need to provide a physically and psychologically healthy urban environment are reasons for promoting a compatible mix of nature and city. Urban areas provide a diversity of economic, social, and cultural opportunities. It is equally important to provide diversity in the natural environment of the city. With proper planning, it is possible to allow intense urban development on suitable land and still retain valuable islands and corridors of open space. Open space may reflect a sensitive natural area, such as the floodway fringe, that is protected from development. Open space can also be a park, a golf course, a cemetery, a body of water, or an area left undeveloped within a private commercial or residential development. Agricultural and forested lands on the fringe of the urban area, in addition to their primary use, provide secondary scenic and open space values."* (emphasis added)
>
> *"The compact urban growth form concentrates urban development and activities, thus protecting valuable resource lands on the urban fringe. But concentrating development increases pressures for development within the urban growth boundary (UGB), making planning for open space and resource protection a critical concern within that boundary.*[1] *Planning can ensure the coexistence of city and nature; one example is the Greenway."* (emphasis added)
>
> *"The Environmental Resources Element provides broad direction for maintaining and improving our natural urban environment. Other elements in the Metro Plan that*

[1] As explained in the *Metro Plan* Preface and Chapter I, Eugene, Springfield and Lane County are taking incremental steps to transition from a single "metropolitan UGB" to two separate UGBs, "the Eugene UGB" and "the Springfield UGB." The general references to "the UGB" within the Environmental Resources Element of the *Metro Plan* shall be interpreted as applying to any UGB within the *Metro Plan* area, unless the text specifically refers to the metropolitan UGB, the Springfield UGB or the Eugene UGB.

provide more detail with particular aspects of the natural environment: Greenway, River Corridors and Waterways; Environmental Design; Public Facilities and Services; and Parks and Recreation Facilities. <u>The emphasis in the Environmental Resources Element is the protection of waterways as a valuable and irreplaceable component of the overall natural resource system important to the metropolitan area.</u> Waterways are also addressed in the "Greenway and Public Facilities and Services elements." While some overlap repetition is unavoidable, the Greenway element emphasizes the intrinsic value of the Willamette River waterway for enjoyment and active and passive use by residents of the area. The public facilities element deals with components of the natural resource system in the context of the water and stormwater systems. The public facilities element includes findings and policies related to waterways, groundwater, drinking water protection, the Clean Water Act, and the Endangered Species Act. "(emphasis added)

"The inventories conducted as the basis for this element and the goals and policies contained herein address Statewide Planning Goals 3, 4, 5, 6, and 7 and interpret those goals in the context of the needs and circumstances of the metropolitan area."

The City's 2030 Plan amendments re-designate 53.3 acres of agricultural land to "Natural Resource" in the North Gateway area. The Natural Resource designation area is coterminous with the FEMA floodway along the floodway of the McKenzie River.

The City's 2030 Plan amendments designate 399.2 acres of land Public/Semi Public. Of this acreage, 148.7 acres are already parkland and will be zoned Public Land and Open Space (PLO) to remain parkland. 72 acres will be rezoned from EFU to PLO. The proposal zones a total of 361 public land acres to Public Land and Open Space.

The City's 2030 Plan amendments designate 274.4 acres of agricultural land (including existing roads and right of way) "Urban Holding Area – Employment."

The City's 2030 Plan amendments redesignate 1.8 acres of private land from Park to "Urban Holding Area – Employment."[2]

The City's 2030 Plan amendments re-zone 327 acres from Exclusive Farm Use (EFU) to "Agriculture – Urban Holding Area" (AG).

The City's 2030 Plan amendments will yield 53.3 acres of Natural Resource land, 361 acres of Public Land and Open Space land, a total of 414.3 acres. The City's 2030 Plan amendments will yield 274 gross acres of land designated to allow urbanization for urban employment uses.

[2] The Land Rural Comprehensive Plan map shows "Park" designation along the eastern parcel lines of Tax lots 18030100 500, 18030100 501 and 18030100 2000 west of the existing UGB line. The Park designation as shown does not follow waterways or other natural features.

As a result of the City's 2030 Plan amendments, 414.3 acres of the 575.8 acres of EFU land affected by the plan change will be designated Public/Semi Public and Natural Resource. Both plan designations support implementation of Metro Plan Environmental Resources Element goals 1-4 (p. III-C-3) by:

1. *"Protect valuable natural resources and encourage their wise management, use, and proper reuse."*
2. *"Maintain a variety of open spaces within and on the fringe of the developing area."*
3. *"Protect life and property from the effects of natural hazards."*
4. *"Provide a healthy and attractive environment, including clean air and water, for the metropolitan population."*

As explained in the City's findings under Goal 5 and 6, lands added to the UGB will become subject to existing Springfield Development Code (SDC) land use regulations that require riparian area setbacks, restoration and enhancement along Water Quality Limited Waterways and wetlands to protect and enhance water quality and aquatic species habitat. Development of land within the floodplain is subject to the City's SDC 3.3-400 Floodplain Overlay District to protect life and property from the effects of natural hazards. Springfield's existing development standards have previously been acknowledged to be in compliance with the Metro Plan Environmental Resources Element and applicable Statewide planning goals and administrative rules.

The 2030 Plan amendments will protect and enhance waterways though application of existing acknowledged Metro Plan policies and Springfield Development Code land use regulations to all lands added to the UGB.

The Environmental Resources Element of the Metro Plan, Policy C.1 states:

> *"<u>Where agricultural land is being considered for inclusion in future amendments to the UGB, least productive agricultural land shall be considered first.</u> Factors other than agricultural soil ratings shall be considered when determining the productivity of agricultural land. Relevant factors include suitability for grazing, climatic conditions, existing and future availability of water for farm irrigation, ownership patterns, land use patterns, proximity to agricultural soils or current farm uses, other adjacent land uses, agricultural history, technological and energy inputs required, accepted farming practices, and farm market conditions."*

As explained in the findings under Goal 14, the City's UGB amendment follows the prioritization of land required by ORS 197.298 and the Goal 14 Location Factors.

The Environmental Resources Element of the Metro Plan, Policy C.3 directs a future study to:

> *"evaluate approaches to use in order to maintain physical separation between the Eugene-Springfield metropolitan area and smaller outlying communities."*

As explained in the findings under Goal 14, the City's UGB amendment, like UGB amendments by other cities, is required to follow the prioritization of land required by ORS 197.298 and the Goal 14 Location Factors. The City has no authority to require other cities to *maintain physical separation between the Eugene-Springfield metropolitan area and smaller outlying communities.* The City's analysis explains the City's rationale for its choice to include the North Gateway and Mill Race sites. The City's findings provide maps[3] depicting the physical separation between Springfield and smaller outlying communities. The City's choice maintains physical separation between the smaller outlying communities of Marcola, Goshen, Jasper, Pleasant Hill, and Cedar Flat that are located within or near the City's UGB Preliminary Study Area. The City's choice to include the North Gateway site, combined with Coburg's UGB expansion choice, slightly reduces the separation between Springfield and Coburg. The City's choice to include the Mill Race site does not reduce separation between Springfield and smaller outlying communities. The City's 2030 Plan amendments are consistent with the intent of Environmental Resources Element Policy C.3.

Environmental Resources Element, Policy C.5 addresses Forestlands:

> *"Metropolitan goals relating to scenic quality, water quality, vegetation and wildlife, open space, and recreational potential shall be given a higher priority than timber harvest within the UGB."*

The City's Development Code 5.19-100 implements Policy C.5 by regulating timber harvest within the UGB. This existing regulation will apply to lands added to the Springfield UGB.

Environmental Resources Element, Policy C.19 states:

> *"Agricultural production shall be considered an acceptable interim and temporary use on urbanizable land and on vacant and underdeveloped urban land where no conflicts with adjacent urban uses exist."*

Environmental Resources Element, Policy C.20 states:

> *"Continued local programs supporting community gardens on public land and programs promoting urban agriculture on private land shall be encouraged. Urban agriculture includes gardens in backyards and interim use of vacant and underdeveloped parcels."*

The 2030 Plan amendments establish and apply the "Agriculture – Urban Holding Area" zoning district to urbanizable lands added to the UGB to allow agricultural production and community gardens as acceptable interim and temporary uses on land designated to meet long-term employment land needs.

Environmental Resources Element, Policy C.21 states:

> *"When planning for and regulating development, local governments shall consider the need for protection of open spaces, including those characterized by significant*

[3] Page 405-407

vegetation and wildlife. Means of protecting open space include but are not limited to outright acquisition, conservation easements, planned unit development ordinances, streamside protection ordinances, open space tax deferrals, donations to the public, and performance zoning."

The City's 2030 Plan amendments include plan designations and plan policies that consider and address the need for protection of open spaces and protection of significant vegetation and wildlife within the areas added to the UGB.

The City designated 53.3 acres of privately-owned agricultural land to "Natural Resource" in the North Gateway area in consideration of the need for protection of open spaces, including those characterized by significant vegetation and wildlife. The Natural Resource designation area is coterminous with the FEMA floodway along the floodway of the McKenzie River. The City's riparian area protection ordinance is applied to all lands added to the UGB.

The City designated 399.2 acres of land Public/Semi Public. Including these lands in the UGB establishes consistent policies and land use regulations to support existing SUB-City-Willamalane partnership efforts to acquire, protect, connect, and enhance public open spaces and waterways in the Mill Race expansion area. The City's findings under Goal 8 and Goal 11 explain why the City incorporated existing parkland and other public land owned by the City and Springfield Utility Board (SUB) in the UGB expansion to meet community park and open space needs identified in the adopted *Willamalane Comprehensive Plan, to* partially address the 300-acre deficit of parkland identified in the City's acknowledged residential land inventory (*Residential Land Use and Housing Needs Analysis)*, and to accommodate SUB's existing and planned public water system water facilities.

The 2030 Plan amendments include Urbanization Element policies requiring updates to applicable natural resource inventories prior to land use approval that permits urban development in the North Gateway and Mill Race UGB expansion areas.

The 2030 Plan amendments include Urbanization Element policies that require adoption of updated implementation measures to protect drinking water and surface water resources prior to approval of rezoning that permits urban development.

The City's 2030 Comprehensive Plan Urbanization Element, Policy 47 states:

"Prior to approval of a plan amendment or zone change that permits urban development within the North Gateway or Mill Race District urbanizable lands, the Springfield Local Wetland Inventory shall be updated in accordance with Statewide planning Goal 5 and Goal 5 administrative rules requirements."

The City's 2030 Comprehensive Plan Urbanization Element, Policy 48 states:

"Prior to approval of a plan amendment or zone change that permits urban development within the North Gateway or Mill Race District urbanizable lands, the Springfield Natural Resources Inventory shall be updated in accordance with

Statewide planning Goal 5 and Goal 5 administrative rules requirements and the Springfield Natural Resources Study shall be amended. The inventory process shall map the resource areas, determine significance, and adopt a list of significant resource sites as part of the comprehensive plan and land use regulations. More precise field surveys to locate top of bank and to monument riparian area setbacks are required prior to site plan approval and issuance of building permits."

The City's 2030 Comprehensive Plan Urbanization Element, Policy 49 states: ***"Employment Lands designated UHA-E shall be planned and zoned as economic districts that provide and promote suitable sites for clean manufacturing[4] uses and office/tech/flex employers in Springfield's target industry sectors. Limited neighborhood-scale retail uses that primarily serve employees within an industrial or office building or complex may be permitted as a secondary element within employment mixed-use zones. Urban Holding Area-Employment (UHA- E) sites shall not be re-designated or zoned to permit development of regional retail commercial uses."***

The City's 2030 Comprehensive Plan Urbanization Element, Policy 50 states:

"The Springfield Water Quality Limited Waterways Map shall be updated to include the North Gateway and Mill Race Districts. Springfield's implementation measures to maintain the City's compliance with the Clean Water Act and other Federal resource protection mandates shall automatically apply to the lands included in the UGB though the provisions of the Springfield Development Code."

The City's 2030 Comprehensive Plan Urbanization Element, Policy 51 states:

"Grow and develop the City in ways that will to ensure the stability of Springfield's public drinking water supply to meet current and future needs.

- ***Prior to City approval of annexation, land division or site development in the North Gateway and Mill Race UHA-E districts, the City — in partnership with Springfield Utility Board — shall conduct a Springfield Development Code Amendment process to prepare and apply specialized development standards that protect Drinking Water Source Areas to urbanizable lands designated UHA-E to ensure that new development contributes to a safe, clean, healthy, and plentiful community drinking water supply. The standards shall identify design, development, construction and best management processes appropriate and necessary to maintain aquifer recharge and protect drinking water quality and quantity. The***

[4] For the purposes of this policy, "clean" is defined as land uses, construction practices, and business operations that minimize waste and environmental impacts, and that contribute to a safe, healthy, and clean community, maintain the aquifer recharge capacity of the site by reducing impervious surfaces, and protect Springfield's drinking water source areas from contamination.

standards shall also identify land use buffers appropriate and necessary to protect the Willamette Wellfield and the surface water features that are known to be in hydraulic connection with the alluvial aquifer.

- ***Continue to Update the Springfield Comprehensive Plan and Springfield Development Code as new natural hazards information becomes available.***

- ***Encourage increased integration of natural systems into the built environment, such as vegetated water quality stormwater management systems and energy-efficient buildings."***

The Springfield CIBL/EOA identified floodway, riparian resource areas and wetlands within the existing and expanded UGB as absolute development constraints, thus the City is not assuming lands with these features are developable for inventory purposes. The City designated a 20-year supply of land that is unconstrained, suitable, and sufficient to meet its commercial and industrial land needs, after careful consideration of the need for protection of open spaces and protection of significant vegetation and wildlife within the existing UGB and expanded UGB.

The 2030 Plan designates and zones land and provides policies to implement protection of open spaces and protection of significant vegetation and wildlife.

Environmental Resources Element, Policy C.25 states:

> *"Springfield, Lane County, and Eugene shall consider downstream impacts when planning for urbanization, flood control, urban storm runoff, recreation, and water quality along the Willamette and McKenzie Rivers."*

The 2030 Plan amendments include plans for urbanization within and adjacent to the floodplains and drainage basins of the Willamette and McKenzie Rivers. Development of land within the floodplain is subject to the City's SDC 3.3-400 Floodplain Overlay District to protect life and property from the effects of natural hazards and SDC 3.3-300 to regulate uses and development setbacks within the greenway. The City regulates development to address flood control, urban storm runoff, recreation, and water quality though its implementation of SDC 4.3-110, 4.3-115, 4.3-117 and 3.3-200 at time of development approval.

Environmental Resources Element, Policies C.30 and 31 state:

> *"Except as otherwise allowed according to Federal Emergency Management Agency (FEMA) regulations, development shall be prohibited in floodways if it could result in an increased flood level. The floodway is the channel of a river or other water course and the adjacent land area that must be reserved to discharge a one-percent-chance flood in any given year."*

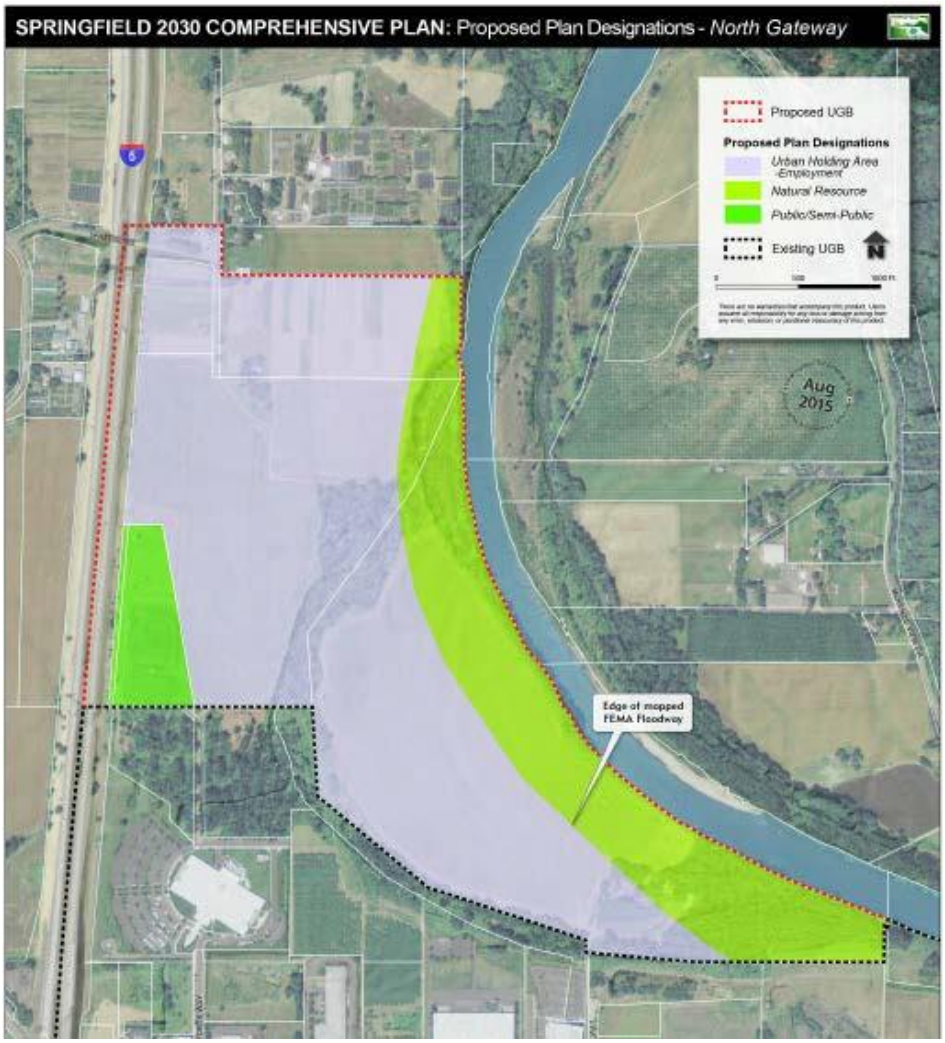
> *"When development is allowed to occur in the floodway or floodway fringe, local regulations shall control such development in order to minimize the potential danger to life and property. Within the UGB, development should result in in-filling of partially developed land. Outside the*

UGB, areas affected by the floodway and floodway fringe shall be protected for their agricultural and sand and gravel resource values, their open space and recreational potential, and their value to water resources."

The City's land inventories did not count land within the floodway as developable. The CIBL/EOA identified floodway, riparian resource areas and wetlands within the existing and expanded UGB as absolute development constraints, thus the City is not assuming lands with these features are developable for inventory purposes. The City designated a 20-year supply of land that is unconstrained, suitable, and sufficient to meet its commercial and industrial land needs, after careful consideration of the need for protection of open spaces and protection of significant vegetation and wildlife within the existing UGB and expanded UGB. Development of land within the floodplain is subject to the City's SDC 3.3-400 Floodplain Overlay District to protect life and property from the effects of natural hazards.

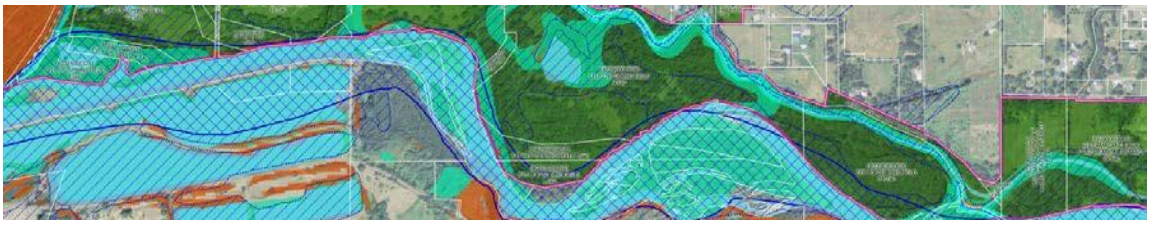
2030 Plan re-designates floodway land to Natural Resource and Public/Semi Public. The City's 2030 Plan amendments designate the 53.3 acres of agricultural land within the FEMA floodway along the floodway of the McKenzie River as "Natural Resource" in the North Gateway area.[5] The Natural Resource designation area is coterminous with the FEMA floodway along the floodway of the McKenzie River.

[5] As shown in the **Map: Proposed Plan Designations North Gateway**



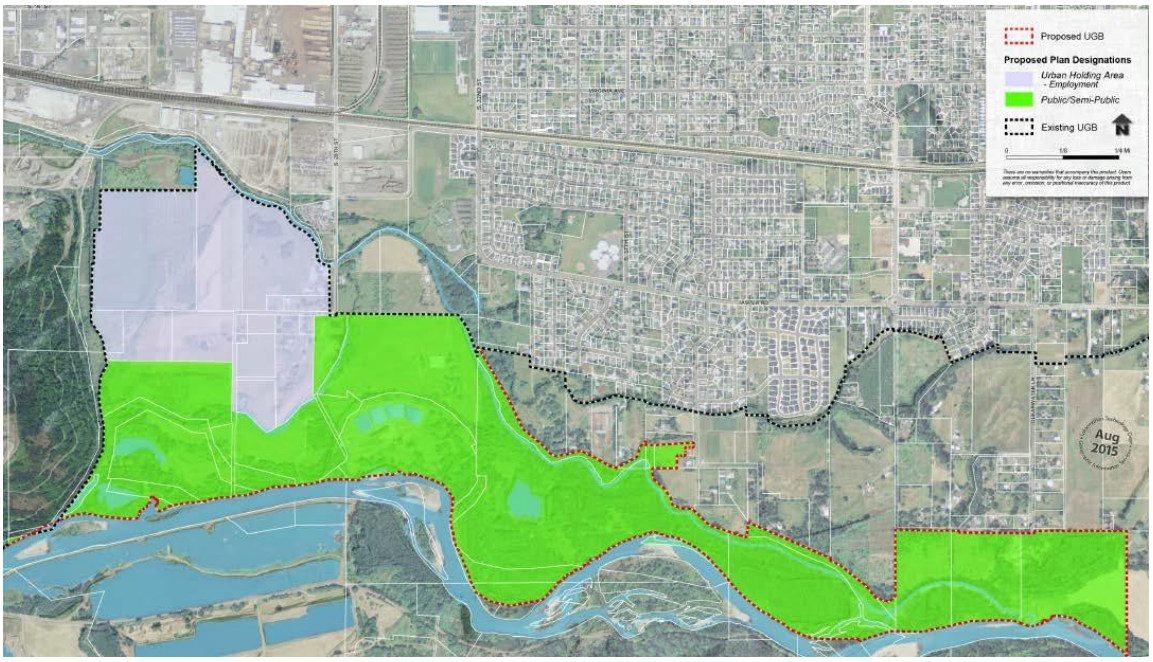
Floodway Extent and Natural Resource Designation: North Gateway UGB Expansion Area

The Middle Fork Willamette River floodway within the Mill Race UGB expansion area is on public land. The 2030 Plan designates that land Public/Semi Public.



Middle Fork Willamette Floodway Extent on Public Land – Mill Race UGB Expansion[6]
(Cross hatch = FEMA floodway)

[6] As shown in **Map – Proposed UGB Expansion – Mill Race**



Public/Semi Public Plan Designation: Mill Race UGB Expansion Area

The City's riparian area protection ordinance is applied to all lands added to the UGB, including water quality limited waterways (WQLW) that are direct tributaries to the McKenzie and Willamette Rivers.

Policies of the Metro Plan Environmental Resources Element will continue to be applicable to Springfield, as refined through adoption of adopted policies in the Springfield Comprehensive Plan.

Conclusion Metro Plan Environmental Resources Element: The 2030 Plan designates and zones land and provides policies to implement the applicable policies of the Metro Plan Environmental Resources Element.

Metro Plan Willamette River Greenway, River Corridors, and Waterways Element and Statewide Planning Goal 15: Willamette River Greenway

OAR 660-015-0005

To protect, conserve, enhance and maintain the natural, scenic, historical, agricultural, economic and recreational qualities of lands along the Willamette River as the Willamette River Greenway.

The Metro Plan Willamette River Greenway, River Corridors, and Waterways Element implements Statewide Planning Goal 15 Willamette River Greenway. The Metro Plan Willamette River Greenway, River Corridors, and

Waterways Element is and will continue to be Springfield's existing acknowledged comprehensive plan adopted pursuant to ORS Chapter 197 and other applicable statutes, goals and guidelines for jurisdictions along the river.

660-024-0020 (1)(e) Adoption or Amendment of a UGB

> *"(1) All statewide goals and related administrative rules are applicable when establishing or amending a UGB, except as follows:*
>
> *(e) Goal 15 is not applicable to land added to the UGB unless the land is within the Willamette River Greenway Boundary."*

Pursuant to OAR 660-024-0020(1)(e) Goal 15 is not applicable to land added to the UGB unless the land is within the Willamette River Greenway Boundary.

The 2030 Plan UGB amendment includes land within the Willamette Greenway, therefore Goal 15 is applicable where the Willamette River Greenway coincides with lands added to the UGB in the Mill Race UGB expansion area.

In addition to the Willamette River Greenway, the Metro Plan Willamette River Greenway, River Corridors, and Waterways Element addresses river corridors and waterways.

Policies of the Metro Plan Willamette River Greenway, River Corridors, and Waterway Element will continue to be applicable to Springfield, as refined through adoption of policies in the Springfield Comprehensive Plan. [7]

The 2030 Plan addresses continued compliance with Goal 15 by demonstrating the Plan's consistency with acknowledged Metro Plan policies, by adding new Springfield-specific policies to more specifically address the Greenway land in the Mill Race UGB expansion area, and by implementing Greenway plan policies through the existing Springfield Development Code regulations[8] applicable to lands within the Willamette Greenway Overlay District.

Willamette River Greenway, River Corridors, and Waterways Element III-D-1 states:

> *"The Willamette River has long been recognized in the Eugene-Springfield area as a valuable natural asset. A number of policy documents and programs adopted by local jurisdictions have reinforced the community concern to preserve and protect metropolitan river corridors."*
>
> *"In the metropolitan area, a large portion of land within the Greenway is in public ownership or public parks such as Mount Pisgah, Skinner's Butte, Alton Baker, and Island Park."*

[7] The jurisdictional area of the *Metro Plan* was found to be in compliance with Goal 15 on September 12, 1982. Subsequent Willamette Greenway boundary determinations have acknowledged by Springfield, Eugene and Lane County.

[8] SDC 3.3-300 Willamette Greenway Overlay District.

"The three jurisdictions cooperated in the development of a bicycle-pedestrian trail system that extends along the Greenway from south of Springfield to north of Eugene and into the River Road area."

Land along the Greenway in private ownership is in a variety of uses, some of which appear to provide greater opportunity than others for public access and enjoyment. "Certain commercial uses, such as restaurants, can allow customers visual enjoyment of the Greenway. Other uses, such as the many industrial uses, would appear to provide little if any opportunity for access or enjoyment of the Greenway. This is evidenced by much of the existing industrial development along the Willamette River in the Glenwood area."

Springfield and Lane County previously adopted a new plan for the Glenwood riverfront[9] that requires and supports transition of land uses along the river from industrial to Residential Mixed Use, Office Mixed Use, Commercial Mixed Use and Employment Mixed Use. Implementation of the plan through the redevelopment of Glenwood will provide opportunities for public access and enjoyment of the Greenway, while maintaining the supply of land to meet 20-year residential and employment needs.

"The statewide Greenway goal specifically applies to the Willamette River. In the Eugene-Springfield area, portions of the McKenzie River share equal importance as a natural resource worthy of conservation and protection. Additionally, the metropolitan network of waterways and associated creeks and drainageways are important features in the metropolitan area, with potential as part of an areawide waterways system. For that reason, while this element must specifically cover the Willamette River Greenway, it is important to consider the McKenzie River, where it is situated within the area of the Metro Plan and the inland system of waterway corridors connecting various parts of Springfield, Eugene, and Lane County to one another."

The City of Springfield requires a Discretionary Use Permit for any change or intensification of use, or construction that has a significant visual impact in the Willamette Greenway Overlay District, which is combined with a "Greenway Setback Line."

Springfield implements Metro Plan Willamette River Greenway, River Corridors, and Waterways Element policies through the land use regulations of its existing, acknowledged Springfield Development Code 3.3-300 Willamette Greenway Overlay District.

The 2030 Plan implements the Metro Plan Willamette River Greenway, River Corridors, and Waterways Element goals, objectives and policies intended to of protect, conserve, and enhance the natural, scenic, environmental, and economic qualities of river and waterway corridors the through the following new 2030 Plan goals, policies and implementation measures:

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[9] Glenwood Refinement Plan Phase One Amendments
http://www.springfield-or.gov/dpw/GlenwoodRefinementPlan.htm

The 2030 Comprehensive Plan Urbanization Element Goal UG-4 states:

> ***"As the City grows and as land develops, maintain and reinforce Springfield's identity as a river-oriented community by emphasizing and strengthening physical connections between people and nature in the City's land development patterns and infrastructure design."***

The 2030 Comprehensive Plan Urbanization Element, Policy 41 states:

> ***"Protect, conserve, and enhance the natural, scenic, environmental, and economic qualities of the McKenzie and Willamette River and waterway corridors as Springfield grows and develops."***

The 2030 Comprehensive Plan Urbanization Element, Policy 42 (adapted from Greenway, River Corridors and Waterways Metro Plan D.2 p III-D-4) states:

> ***"Land use regulations and acquisition programs along river corridors and waterways shall take into account the concerns and needs of the community, such as recreation, resource protection, wildlife habitat, enhancement of river corridor or waterway environments, potential for public access, and opportunities for river-oriented urban development and infrastructure design.***

The City's 2030 Comprehensive Plan Urbanization Element, Policy 43 (adapted from Greenway, River Corridors and Waterways Metro Plan D.3, p III-D-4) states:

> ***The City of Springfield and Willamalane shall continue to cooperate in expanding water-related parks and other facilities, where appropriate, that allow access to and enjoyment of river and waterway corridors.***

The City's 2030 Comprehensive Plan Urbanization Element, Policy 44 (adapted from Greenway, River Corridors and Waterways Metro Plan D.4, p III-D-4) states:

> ***New development that locates along river corridors and waterways shall be designed to enhance natural, scenic and environmental qualities of those water features.***

2030 Plan Urbanization Element Policies 45, 47 and 52 direct planning efforts to provide public access to the Mill Race, Willamette River Greenway and the McKenzie River and to provide active transportation systems in new growth areas.

The City's 2030 Comprehensive Plan Urbanization Element, Policy 45 (adapted from Greenway, River Corridors and Waterways Metro Plan D.4, p III-D-4) states:

> ***"Continue efforts to restore, enhance and manage the Springfield Mill Race to fulfill multiple community objectives. Partner with Willamalane and Springfield Utility Board to provide public access to the Mill Race where appropriate.***

Springfield 2030 Comprehensive Plan Urbanization Element, Policy 47 states:

"Continue efforts to provide increased opportunities for public access to the Willamette River Greenway and the McKenzie River through comprehensive planning, development standards, annexation agreements, the land use permitting process, and through partnerships with Willamalane, Springfield Utility Board and property owners."

Springfield 2030 Comprehensive Plan Urbanization Element, Policy 52 states:

"Grow and develop the City in ways that maintain and improve Springfield's air quality to benefit public health and the environment.

- ***Prioritize and seek funding for mixed use land use district planning and multi-modal transportation projects that reduce reliance on single occupancy vehicles (SOVs) consistent with Springfield Transportation System Plan (TSP) Policy 1.2, 1.3 and 1.4.***
- ***Coordinate land use and transportation system planning for urbanizable lands at the refinement plan and/or Master Plan level to identify and conceptually plan alignments for locating multi – modal facilities.***
- ***Plan, zone and design transportation systems in the North Gateway and Mill Race Urban Holding Area - Employment districts to provide multi-modal transportation choices for district employees.***
- ***Promote the use of active transportation systems as new growth areas and significant new infrastructure are planned and developed.***

In addition to Springfield-specific 2030 Plan Urbanization Policies applicable to lands within the Springfield UGB, the Metro Plan Willamette River Greenway, River Corridors, and Waterway Element will continue to be applicable to Springfield, as specifically refined through adoption of policies in the Springfield Comprehensive Plan.

Metro Plan Environmental Design Element

Metro Plan Environmental Design Element II-D-6 states:

"The Environmental Design Element is concerned with that broad process which molds the various components of the urban area into a distinctive, livable form that promotes a high quality of life.

The Metro Plan must go beyond making the urban area more efficient and better organized to also ensure that the area is a pleasant, attractive, and desirable place for people to live, work, and play. The Environmental Design Element is concerned with how people perceive and interact with their surroundings. Perceptions of livability greatly differ between individuals; so, generalizations concerning this element need to be carefully drawn. Many different indicators of livability have been identified, such as the numbers of local educational, medical, and recreational facilities, and natural environmental conditions. Not all these indicators are directly concerned with environmental design, showing that the concept of livability is influenced by all elements of the Metro Plan. This element focuses on some of the features of the natural and built environment that affect the quality of life.

The metropolitan area is changing in ways that are far-reaching and diverse. Decisions that concern change have an effect on the form of the area. If we are to maintain a livable urban environment and realize the full potential of our desirable and distinctive qualities, daily decisions that concern change must be guided by environmental design principles, such as site planning, in combination with other planning policies.

Based on concerns related to energy conservation, environmental preservation, transportation, and other issues, increased density is desirable. This increases the need for effective, detailed environmental design in order to ensure a high quality of life and a high degree of livability in an increasingly dense urban environment.

This area is noted for the high degree of livability enjoyed by its residents. Environmental design is a process that helps to maintain and enhance these positive attributes."

This Element has 3 Goals (III-E-1):

- *Secure a safe, clean, and comfortable environment which is satisfying to the mind and senses.*
- *Encourage the development of the natural, social, and economic environment in a manner that is harmonious with our natural setting and maintains and enhances our quality of life.*
- *Create and preserve desirable and distinctive qualities in local and neighborhood areas.*

Policy E-7 states:

"The development of urban design elements as part of local and refinement plans shall be encouraged."

Policy E-9 states:

"Refinement plans shall be developed to address compatibility of land uses, safety, crime prevention, and visual impact along arterial and collector streets, within mixed-use areas. During the interim period before the adoption of a refinement plan, these considerations shall be addressed by cities in approving land use applications in mixed use areas by requiring conditions of approval where necessary.

Springfield has previously adopted local urban design plans for the Downtown District and the Glenwood Phase One mixed use areas. Springfield addresses this policy as local district and neighborhood refinement plans are adopted. Springfield addresses this policy by implementing Springfield Development Code standards for new development though the land use approval process. 2030 Plan policies require additional refinement planning for new areas added to the UGB.

<u>Conclusion Metro Plan Environmental Design Element:</u> The 2030 Plan amendments are consistent with Metro Plan Environmental Design Element policies.

Statewide Planning Goal 1: Citizen Involvement

OAR 660-015-0000(1)
To develop a citizen involvement program that insures the opportunity for citizens to be involved in all phases of the planning process.

No amendments to acknowledged citizen involvement programs are proposed. The Springfield and Lane County have acknowledged land use codes that are intended to serve as the principal implementing ordinances for the *Metro Plan*. Chapter 5 of the SDC, *Metro Plan* Amendments; Public Hearings, prescribes the manner in which a Type II *Metro Pla*n amendment must be noticed. Requirements under Goal 1 are met by adherence to the citizen involvement processes required by the *Metro Plan* and implemented by the Springfield Development Code, Chapter 5, Section 5.14-135, Eugene Code Section 9.7735, and Lane Code Sections 12.025 and 12.240.

Through the multi-year 2030 Plan public involvement process, including the 2008-2009 CIBL Technical and Stakeholder Advisory committee process, surveys, open houses, community workshops, public hearings, neighborhood meetings, and outreach to service providers and public agencies, the City received information from citizens, land owners and advocacy groups. The local record contains complete documentation of each public involvement activity conducted, including meetings, open houses, workshops, surveys, visioning sessions, work sessions, outreach to agencies and service providers, notice, and public hearings. The City published recordings of the CIBL Stakeholder Committee meetings, meeting minutes, 2010 Planning Commission public hearing, and summaries of input received 2007-2016 on the City web site. The City Council and Lane County Board of Commissioners have considered the input received to identify and evaluate a range of alternatives for accommodating employment growth within the existing UGB and in alternative locations around the UGB.

Notice of the proposed 2030 Plan amendments was provided to DLCD on December 31, 2009. The subject 2030 Plan and UGB amendments were considered as part of a larger 2030 Plan package of land use policy and land use regulation amendments to address Springfield's land needs for the 2010-2030 planning period.

The Springfield and Lane County Planning Commissions conducted the first evidentiary hearings on the on the 2030 Plan and UGB amendments at a joint hearing on February 17th and March 16th, 2010 (Springfield File No. LRP 2009-00014, Lane County File No. PA09-6018). The City received 52 documents on this matter from interested parties and 22 persons appeared at the public hearing. The staff report, the oral testimony, letters received, written submittals of the persons testifying at the hearing, and the public record for file # LRP 2009-00014 were considered and incorporated into the record. Responses to testimony were provided in a 40-page memorandum from Planning Manager Gregory Mott, dated April 20, 2010. (Planning Commission Memorandum for April 20, 2010 Regular Session, Planning Commission Transmittal Memorandum Attachment 2). The Joint Planning Commissions concluded their proceedings on May 4, 2010. For a summary of the Planning Commission process and meeting minutes, see Springfield File No. LRP 2009-00014, September 12, 2016 Agenda Item Summary meeting packet, ATT1-C

Planning Commission Process. For complete documentation of the hearing process and Planning Commission recommendations, see Springfield File No. LRP 2009-00014 and Lane County File No. PA 09-6018.

The City Council and Lane County Board of County Commissioners were originally scheduled to conduct a public hearing on the draft 2030 Plan on July 26, 2010. However, many important issues were raised by the Department of Land Conservation and Development staff, the Planning Commissions and members of the public during the initial review process. Council directed staff to allow sufficient time to prepare thorough and comprehensive consideration of the input received. Staff, in consultation with the City legal team, also recommended that the City pay close attention to pending Court of Appeals decisions and other legal rulings that will affect the State's review of Springfield Urban Growth Boundary amendment proposal. These matters led the City to adjust the 2030 Plan adoption schedule as necessary to:

- Adopt the Springfield UGB, Residential Element, Land Use Efficiency Measures and Glenwood Phase One plan amendments to address 20-year housing needs (without expanding the UGB) in a timely manner;
- Ensure efficient coordination with concurrent City and Metro partner comprehensive planning activities including necessary "enabling" amendments to the Metro Plan;
- Clarify and address issues raised in the Planning Commission hearing process;
- Address significant issues raised in recent and pending legal decisions regarding UGB expansions.

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

One person testified in favor of the proposed code, no persons testified against or neutral. The Planning Commission found that the proposed amendments are consistent with the criteria of SDC Section 5.6-115A-C, supported by specific findings of fact and additional information submitted for the December 18, 2013 public hearing. The Planning Commission forwarded a recommendation for approval to the Springfield City Council and Lane County Board of Commissioners for their consideration. The Planning Commission recommendation was included in September 12, 2016 Agenda Item Summary meeting packet, ATT1-C Planning Commission Process (Springfield File No. LRP 2009-00014).

Amended Notice of the proposed 2030 Plan amendments to DLCD was provided on August 5, 2016. Notice of the proposed boundary change was mailed on August 4, 2016 to interested parties, parties of record, and property owners and residents. Notice of the hearing was published in the Register Guard newspaper on August

23, 2016.

On September 12, 2016 the Springfield City Council, Lane County Board of Commissioners, and Lane County Planning Commission conducted a Joint Work Session and Joint Public Hearing on the proposed land use plan changes. After hearing the oral testimony given by eight individuals, the elected officials closed the hearing, kept the record open for public comment until October 14, 2016, and allowed staff until October 21, 2016 to add information to the record in response to any new information submitted. The audio recording and minutes for the September 12, 2016 meeting provide complete documentation of the oral testimony presented and the minutes become part of the public record for File No. LRP 2009-00014. Copies of all written testimony received have been placed in the record. Nine individuals provided written testimony.

The City's response to issues raised in this testimony was provided in the November 7, 2016 Agenda Item Summary meeting packet, ATT1 Council Briefing Memo and Exhibits and in staff Pauly's oral staff report presentation at the November 7th, 2016 meeting. (Springfield File No. LRP 2009-00014, City Council Minutes of November 7, 2016 meeting.) See Ordinance Exhibit F-1 Supplemental Findings, attached to these findings.

The Springfield City Council and Lane County Board of Commissioners held a joint public hearing to conduct deliberations on November 7, 2016. On December 5, 2016, the Springfield City Council adopted the 2030 Plan amendments ordinance (Ordinance No. 6361). On December 6, 2016 Lane County Board of Commissioners adopted Ordinance No. PA 1304.

Conclusion Goal 1: As described in the City's findings under Goal 9 and 14, the City provided ample opportunities for citizens to be involved in all phases of the 2030 planning process. The Record Index provides a complete list of citizen involvement activities conducted by the City over a multi-year period between 2007 and 2016. The CIBL/EOA Appendix D explains how community visioning informed the identification of community economic development objectives and strategies, and the assumptions used in the CIBL/EOA to determine employment land needs. The local record contains complete documentation of each public involvement activity conducted, including meetings, open houses, workshops, surveys, visioning sessions, work sessions, outreach to agencies and service providers, notice, and public hearings.

Statewide Planning Goal 2: Land Use Planning

OAR 660-015-0000(2)

To establish a land use planning process and policy framework as a basis for all decision and actions related to use of land and to assure an adequate factual base for such decisions and actions.

The Metro Plan and Springfield 2030 Comprehensive Plan are the land use or comprehensive plans required by this goal; the Springfield Development Code and the Lane Code are the implementation measures required by

this goal. Comprehensive plans, as defined by ORS 197.015(5), must be coordinated with affected governmental units. Coordination means that comments from affected governmental units are solicited and considered. The CIBL/EOA provides an adequate factual base for decisions and action in regard to implementation of Goal 9 Economic Development on lands within the Springfield Urban Growth Boundary.

The current version of the *Metro Plan* was last amended in 2014 (DLCD File no. 003-14, Springfield Ordinance No. 6332; Eugene Ordinance No. 20545; and Lane County Ordinance No. PA 1313).

The 2030 Plan amendments are the next step in Springfield's process to adopt a City-specific comprehensive plan, in light of the evolving framework for land use planning in the Eugene-Springfield metropolitan area. As stated on page I-3 to I-4 of the Metro Plan:

> *"Oregon Revised Statute 197.304 (2007)*
>
> *Historically, many provisions in the Metro Plan were based on a premise that Eugene and Springfield would continue to have a regional metropolitan urban growth boundary ("metropolitan UGB") that includes both cities and adjacent "urbanizable" areas of Lane County. However, ORS 197.304, adopted by the Oregon Legislature in 2007, requires Eugene and Springfield to divide the metropolitan UGB into two city-specific UGBs. Each city is also required to demonstrate that its separate UGB includes sufficient land to accommodate its 20-year need for residential land consistent with Statewide Planning Goal 10 (Housing) and Goal 14 (Urbanization). These statutory mandates implicitly require each city to also adopt a separate 20-year population forecast. ORS 197.304 allows the cities to take these separate actions "[n]otwithstanding . . . acknowledged comprehensive plan provisions to the contrary."*
>
> *The ORS 197.304 mandates are being carried out by the two cities and Lane County through a series of incremental actions over time rather than through a Metro Plan Update process. Some of the land use planning that has historically been included in the Metro Plan will, instead, be included in the cities' separate, city-specific comprehensive plans. This does not diminish the fact that the cities and the county remain committed to regional problem-solving.*[10]
>
> *The three jurisdictions anticipate that the implementation of ORS 197.304 will result in a regional land use planning program that continues to utilize the Metro Plan and regional functional plans for land use planning responsibilities that remain regional in nature. <u>City-specific plans will be used to address those planning responsibilities that the cities address independently of each other."</u>* (emphasis added)
>
> *"<u>In addition to the continued collaboration through some regional land use plans, such as the regional transportation system plan and the regional public facilities and services plan, the three jurisdictions are committed to working collaboratively in other ways and through other</u>*

[10] In addition to the continued collaboration through some regional land use plans, such as the regional transportation system plan and the regional public facilities and services plan, the three jurisdictions are committed to working collaboratively in other ways and through other initiatives, such as the Regional Prosperity Economic Development Plan jointly approved in February, 2010.

initiatives, such as the Regional Prosperity Economic Development Plan jointly approved in February, 2010." (emphasis added)

Each city is taking a different approach to, and is on a different time line for, establishing its own UGB, 20-year land supply and city-specific comprehensive land use plans. As this incremental shift occurs, the Metro Plan will be amended several times to reflect the evolving extent to which it continues to apply to each jurisdiction. During this transition, the three jurisdictions will also continue to work together on any other Metro Plan amendments needed to carry out planning responsibilities that continue to be addressed on a regional basis. (emphasis added)

ORS 197.304 allows the cities to adopt local plans that supplant the regional nature of the Metro Plan "[n]otwithstanding . . . acknowledged comprehensive plan provisions to the contrary." As these local plans are adopted, Eugene, Springfield and Lane County wish to maintain the Metro Plan as a guide that will direct readers to applicable local plan(s) when Metro Plan provisions no longer apply to one or more of the jurisdictions. Therefore, when Eugene or Springfield adopts a city-specific plan to independently address a planning responsibility that was previously addressed on a regional basis in the Metro Plan, that city will also amend the Metro Plan to specify which particular provisions of the Metro Plan will cease to apply within that city.[11] *Unless the Metro Plan provides otherwise, such Metro Plan provisions will continue to apply within the other city. If the other city later adopts its own city-specific plan intended to supplant the same Metro Plan provisions, it may take one of two actions. That city will either amend the Metro Plan to specify that the particular provisions also cease to apply within that city or, if the provisions do not apply to rural or urbanizable areas within the Metro Plan boundary, to simply delete those particular Metro Plan provisions.* (emphasis added)

To better enable the jurisdictions to amend the Metro Plan as required by ORS 197.304, the procedures for amending the Metro Plan, provided in Chapter IV, were revised in 2013. The Eugene City Council, the Springfield City Council, and the Lane County Board of Commissioners adopted identical amendments to Chapter IV of the Metro Plan on November 18, 2013:

Eugene City Council, Ordinance No. 6304

Springfield City Council, Ordinance No. 20519

Lane County Board of Commissioners, Ordinance No. PA 1300"

As explained in Metro Plan pages I-8 to I-9:

[11] As more specifically explained in Chapter IV of the Metro Plan, one city with co-adoption by Lane County may amend the *Metro Plan* to specify which particular *Metro Plan* provisions no longer apply within the unincorporated (urbanizable) portions of its UGB. The other city is not required to co-adopt such a *Metro Plan* amendment. *See* Chapter IV.

"Relationship to Other Plans, Policies, and Reports

The Metro Plan is the basic guiding land use policy document for regional land use planning. As indicated in the Purpose section, above, the region also utilizes: (a) city-wide comprehensive plans; (b) functional plans and policies addressing single subjects throughout the area, including the Eugene-Springfield Public Facilities and Services Plan (Public Facilities and Services Plan) and the regional transportation system plan; and (c) neighborhood plans or special area studies that address those issues that are unique to a specific geographical area. In all cases, the Metro Plan is the guiding document for regional comprehensive land use planning and city-specific plans may be adopted for local comprehensive land use planning. Refinement plans and policies must be consistent with applicable provisions in the Metro Plan or the applicable local comprehensive plan. Should inconsistencies occur, the applicable comprehensive plan is the prevailing policy document. The process for reviewing and adopting refinement plans is outlined in Chapter IV. (emphasis added)

The City coordinated with the affected units of government (Eugene and Lane County) in adoption the 2014 Metro Plan "enabling" amendments. Staff forwarded the 2030 Metro Plan text amendments in Ordinance Exhibit D to Eugene planning staff. Staff coordinated with Eugene and Lane County on the boundary description. Staff coordinated closely with Lane County staff and legal counsel to prepare the 2030 Plan Urbanization Element policies, plan designations and zoning maps. Eugene and Lane County staff participated in the CIBL Technical Advisory Committee, along with representatives from Oregon Department of Transportation, Oregon Economic and Business Development Department, and the Department of Land Conservation and Development. Staff conducted outreach to affect government agencies throughout the multi-year planning process, as documented in the local record.

The 2030 Plan amendments (Ordinance Exhibit D) amend Metro Plan text to clearly state where the new Springfield 2030 Plan policies supplant, add or delete certain Metro Plan policies and findings.

The Metro Plan was amended to adopt the 2030 Plan amendments after public meetings, public workshops and joint hearings of the Springfield and Lane County Planning Commissions and Elected Officials.

Goal 2 Conclusions. The 2030 Plan amendments adopt the CIBL/EOA as the Technical Supplement to the Springfield 2030 Comprehensive Plan Economic Element to establish the adequate factual base for decisions and actions in regard to implementation of Goal 9 Economic Development on lands within the Springfield Urban Growth Boundary.

The 2030 Plan amendments provide consistent and coordinated comprehensive planning to implement Metro Plan policies and Goal 2.

Statewide Planning Goal 5: Natural Resources, Scenic and Historic Areas, and Open Spaces

OAR 660-015-0000(5)
To protect natural resources and conserve scenic and historic areas and open spaces.

660-024-0020 (1)(c) Adoption or Amendment of a UGB

> *"(1) All statewide goals and related administrative rules are applicable when establishing or amending a UGB, except as follows:*
>
> *(c) Goal 5 and related rules under OAR chapter 660, division 23, apply only in areas added to the UGB, except as required under OAR 660-023-0070 and 660-023-0250;"*

Goal 5 and related rules under OAR chapter 660, division 23 are applicable to the proposal only in the areas added to the UGB. [OAR 660-024-0020 (1)(c)]

OAR 660-023-0050 Programs to Achieve Goal 5

Springfield and Lane County have previously acknowledged plans and programs to achieve Goal 5 in compliance with the Division 23 rule adopted by LCDC in 1996. Lands added to the UGB were included and addressed in the Eugene/Springfield Metropolitan Natural Resources Study because those lands were within the Metro Plan boundary and study area. Lane County Maps (2004) of Goal 5 resources outside the UGB are provided in the record. Springfield's protection measures will be applicable to the lands added to the UGB.

OAR 660-023-0070 (1) Buildable Lands Affected by Goal 5 Measures

Springfield's previously acknowledged measures to protect resource sites inside the UGB affect the inventory of buildable lands. Springfield's CIBL/EOA land inventory process identified Wetlands and Riparian Resources — including development setbacks —as "Absolute Constraints." Constrained acres have been deducted from the buildable land inventory and calculation of suitable acres on a site. Springfield's UGB amendment of the UGB adds suitable, unconstrained land based on the inventory and site needs analysis.

OAR 660-023-0250 Applicability

> *"(1) This division replaces OAR 660, Division 16, except with regard to cultural resources, and certain PAPAs and periodic review work tasks described in sections (2) and (4) of this rule. Local governments shall follow the procedures and requirements of this division or OAR 660, Division 16, whichever is applicable, in the adoption or amendment of all plan or land use regulations pertaining to Goal 5 resources…"*

The proposal does not adopt plan or land use regulations pertaining to Goal 5 resources. OAR 660-023-0250(1) is not triggered.

> *"(3) Local governments are not required to apply Goal 5 in consideration of a PAPA unless the PAPA affects a Goal 5 resource. For purposes of this section, a PAPA would affect a Goal 5 resource only if:*
>
> *(a) The PAPA creates or amends a resource list or a portion of an acknowledged plan or land use regulation adopted in order to protect a significant Goal 5 resource or to address specific requirements of Goal 5;"*

The proposal does not create or amend a resource list or a portion of an acknowledged plan or land use regulation adopted in order to protect a significant Goal 5 resource or to address specific requirements of Goal 5. OAR 660-023-0250(3)(a) is not triggered.

> *"(b) The PAPA allows new uses that could be conflicting uses with a particular significant Goal 5 resource site on an acknowledged resource list; or"*

<u>2030 Plan requires Goal 5 inventory updates for UGB expansion areas prior to approval of urban uses.</u> The 2030 Plan does not allow new uses that could be conflicting uses with a particular significant Goal 5 resource site on an acknowledged resource list. Areas added to the UGB to meet employment land needs are designated "Urban Holding Area – Employment (UHA-E)" and zoned "Agriculture—Urban Holding Area (AG)." Although land is added to the City's urbanizable area, the AG zoning district is a holding district that does not allow new urban uses that could be conflicting uses with a particular significant Goal 5 resource site on an acknowledged resource list. The AG zoning district allows a subset of uses that are currently permitted under the existing Lane County Exclusive Farm Use (EFU) zoning. OAR 660-023-0250(3)(b) is not triggered.

> *"(c) The PAPA amends an acknowledged UGB and factual information is submitted demonstrating that a resource site, or the impact areas of such a site, is included in the amended UGB area."*

The 2030 Plan amendments amend the acknowledged Springfield UGB. The City's GIS-based analysis of the amended UGB area and factual information from adopted City and County ordinances indicates that inventoried Goal 5 resource sites are present in the amended UGB areas. Therefore, for the purposes of this section, the 2030 UGB and associated PAPA "would affect a Goal 5 resource." [OAR 660-023-0250(3)(c)]

<u>Inventoried Goal 5 Resources: Metro Natural Resources Study 2005-2006 (completed under previous Period Review).</u> Springfield Ordinance 6085 (2004) adopted criteria for determining significant Goal 5 riparian or wildlife habitat sites within the City limits and adopted an updated Goal 5 inventory within the Springfield city limits. The ordinance adopted Exhibit A (criteria), and Exhibit B (list and 6 map tiles entitled Springfield Inventory of Natural Resource Sites within the Springfield city limits). Ord. Section 3 states: "the inventory of significant Goal 5 resources for the Springfield city limits shall include, and be limited to, the resource sites shown for that area on the following documents: April 12, 1978 Sand and Gravel Working Paper; April 12, 1978 Scenic Sites Working Paper; the April 12, 1978 Willamette River Greenway Working Paper; the April 12, 1978 Archaeological

Sites Working Paper; the 1998 Springfield Local Wetland Inventory; the Washburne Historic Landmark District; the Historic Landmark Inventory; and the 1992 Gateway Historic resources Survey."

Springfield Ordinance 6150 (2005) and Lane County Ordinance PA1233 (2006) adopted the Springfield Natural Resources Study — including the Springfield Inventory of Natural Resource Areas as an element of previous *Metro Plan* Periodic Review Task 7 and the Springfield Local Wetland Inventory as an element of previous *Metro Plan* Periodic Review Task 5. The study addressed resources located within the City of Springfield and its urbanizable area. The Study was prepared to complete the inventory process described in OAR 660-023-0030 and the ESEE decision process described in OAR 660-023-0040 and included implementing regulations to achieve Goal 5 compliance. The Springfield Development Code was amended concurrently to add protection measures for identified natural resource areas (wetlands and riparian). The adopting ordinance also included the following text:

> *"WHEREAS, in addition to the inventories of riparian, upland wildlife habitat and wetland sites referred to above, the following inventories make up the entire inventory of significant Goal 5 resources within the City of Springfield: the April 12, 1978 Sand and Gravel Working Paper; April 12, 1978 Scenic Sites Working Paper; the April 12, 1978 Willamette River Greenway Working Paper; the April 12, 1978 Archaeological Sites Working Paper; the December 1, 1976 list of historic landmarks, and the Water-quality Limited Waterways Map."*

Springfield and Lane County have previously acknowledged Goal 5 inventories and programs to achieve Goal 5 within the existing UGB. The existing Metro Plan Natural Resources Study inventoried resources in the UGB expansion areas because those lands were within the Metro Plan boundary when the inventories were conducted and acknowledged.

<u>Springfield has existing Division 23-compliant programs in place to achieve Goal 5, consistent with OAR 660-023-0050 and those programs will apply to the land added to the UGB.</u> Springfield Development Code 4.3-117 Natural Resource Protection Areas contains the City's development standards for protecting natural resources to implement Goal 5, to safeguard fish and wildlife habitat and to implement the goals and policies of the *Metro Plan*. The code provisions are applicable to "land within the wetland and/or riparian resource boundary and the development setback area, specifically locally significant protected wetlands, listed in the Local Wetland Inventory and shown on the Local Wetland Inventory Map; locally significant protected riparian areas, listed in the Springfield Inventory of Natural Resources Sites and shown on the Natural Resources Inventory Map.

When the UGB amendment is acknowledged, land use decisions for the urbanizable land added to the UGB will be subject to the development standards in SDC 4.3-117 for protecting natural resources to implement Goal 5, to safeguard fish and wildlife habitat and to implement the goals and policies of the *Metro Plan*.

Springfield Development Code 4.3-115 Water Quality Protection contains the City's development standards for protecting riparian areas along watercourses shown on the Water Quality Limited Watercourses (WQLW) Map, as explained in the City's findings under Goal 6. When the UGB amendment is acknowledged, the urbanizable land added to the UGB will be subject to the development standards for protecting riparian areas in SDC 4.3-115.

OAR 660-023-0250(3)(c) Conclusion: Goal 5 is applicable to the proposal pursuant to OAR 660-023-0250(3)(c). Goal 5 is applicable to the proposal only in the areas added to the UGB pursuant to 660-024-0020 (1)(c).

Goal 5 Resources within the UGB expansion areas. The following inventoried Goal 5 resources and Water Quality Limited Waterways* are located within or in proximity to Springfield's proposed UGB expansion areas:

Goal 5 Resources located within or in proximity to Springfield's proposed UGB expansion areas		
Wetland Resources	***Location/Expansion Area***	***Goal 5 Inventory***
M 01 wetland	Ruff Park	Goal 5 Local Wetland Inventory
W 01a Mill Race	Mill Race	Goal 5 Local Wetland Inventory
M20 Maple Island Slough	North Gateway	Goal 5 Local Wetland Inventory
LC NWI ID 4650, 4642	North Gateway	Goal 5 National Wetland Inventory
LC NWI ID 6349, 6357, 6363, 6373, 6263, 6272, 6274, 6302, 6409, 6419, 6381, 6415, 6420, 6405, 6450, 6466	Mill Race	Goal 5 National Wetland Inventory
Waterways & Riparian Resources	***Location/Expansion Area***	***Protection Status as Goal 5 and/or Water Quality Limited Waterways (WQLW)***[12] (for WQLW see Goal 6 findings)
S03 Mill Race A, natural	Mill Race	Goal 5 and Local WQLW
Middle Fork Willamette River	Mill Race	Goal 5 and Oregon WQLW >1000CFS
Gorrie Creek	Mill Race	Goal 5 and Local WQLW
Quarry Creek	Mill Race	Local WQLW
S17 Maple Island Slough/McKenzie River[13]	North Gateway	Goal 5 and Local WQLW

[12] Springfield Ordinance No. 6021, adopted July 15, 2002 amendments the SDC to reference the WQLW Map. The title of the ordinance includes the statement "adopting the water quality limited watercourse map", yet ordinance Section 28 states "The Water Quality Limited Watercourse (WQLW) Map, August 2002 is hereby added by reference". The definition in Chapter 6 of the Development Code for the Water Quality Limited Watercourses is "Those watercourses within the City and its urbanizing area that are specified on the WQLW Map" and that the standards for protecting watercourses in Section 4.3-115 only apply to those watercourses that are shown on the WQLW Map. The August 2002 WQLW map is the most recent adopted map for regulatory purposes.

[13] A mapping discrepancy regarding Goal 5 Natural Resource site #S17 Maple Island Slough/McKenzie River was brought to the City's attention on March 4, 2011 when the City received a letter from Wicklund Trust stating a concern about the accuracy of maps in the adopted Goal 5 inventory depicting the portion of natural resource site S-17 outside the UGB. Exhibit F-1 Supplemental Findings pp. 29-34 explain how this concern was addressed. Lane County Goal 5 Significant Riparian Corridors map dated Jan. 2004 shows the McKenzie River Riparian Resource for

McKenzie River	North Gateway	Goal 5 and Oregon WQLW>1000CFS
S10 McKenzie Oxbow	Oxbow	Goal 5 and Oregon WQLW
Keizer Slough	Oxbow	Oregon WQLW
48th Street Channel	Just east of Oxbow and Ke Slough	Local WQLW
Cedar Creek	Lively Park, Ruff Park	Goal 5 and Local WQLW

Water Quality Limited Watercourses (WQLW) shown on the Springfield WQLW map were included in the Goal 5 inventory of significant sites within the City of Springfield (Springfield Ordinance 6150). As shown in the City's Water Quality Limited Watercourses Map, most of the inventoried WQLWs are located along the existing UGB or within the City Limits. WQLWs contain Oregon Division of State Lands "Essential Salmonid Habitat" Stream Designations. WQLWs are protected under the Water Quality Protection standards in Springfield Development Code 4.3-115. Natural Resource Protection Areas are protected under Springfield Development Code 4.3 –117 Natural Resource Protection Areas.

2030 Plan Urbanization Element Policy 47 states:

> ***"Prior to approval of a plan amendment or zone change that permits urban development within the North Gateway or Mill Race District urbanizable lands, the Springfield Local Wetland Inventory shall be updated in accordance with Statewide planning Goal 5 and Goal 5 administrative rules requirements."***

2030 Plan Urbanization Element Policy 48 states:

> ***"Prior to approval of a plan amendment or zone change that permits urban development within the North Gateway or Mill Race District urbanizable lands, the Springfield Natural Resources Inventory shall be updated in accordance with Statewide planning Goal 5 and Goal 5 administrative rules requirements and the Springfield Natural Resources Study shall be amended. The inventory process shall map the resource areas, determine significance, and adopt a list of significant resource sites as part of the comprehensive plan and land use regulations. More precise field surveys to locate top of bank and to monument riparian area setbacks are required prior to site plan approval and issuance of building permits."***

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the Wicklund site outside the UGB. A Goal 5 inventory for the Wicklund site in accordance with OAR 660-023-0030 and amendment of the Springfield Natural Resources Study will be required prior to approval of a plan amendment or zone change that permits urban development on the site, as described in Urbanization Element Policies 47 and 48. The inventory process shall map the resource areas, determine significance, and adopt a list of significant resource sites as part of the comprehensive plan and land use regulations. More precise field surveys to locate top of bank and to monument riparian area setbacks are required prior to site plan approval and issuance of building permits.

2030 Plan Urbanization Element Policy 50 requires an update of the WQLW map to include the areas added to the UGB:

> ***"The Springfield Water Quality Limited Waterways Map shall be updated to include the North Gateway and Mill Race Districts. Springfield's implementation measures to maintain the City's compliance with the Clean Water Act and other Federal resource protection mandates shall automatically apply to the lands included in the UGB though the provisions of the Springfield Development Code."***

> **"***(4) Consideration of a PAPA regarding a specific resource site, or regarding a specific provision of a Goal 5 implementing measure, does not require a local government to revise acknowledged inventories or other implementing measures, for the resource site or for other Goal 5 sites, that are not affected by the PAPA, regardless of whether such inventories or provisions were acknowledged under this rule or under OAR 660, Division 16."*

<u>Conclusion OAR 660-023-0250(4):</u> Pursuant to OAR 660-023-0250(4), the City is not required to revise the Metro Natural Resources inventory acknowledged in 2005 or its Springfield Development Code Goal 5 protection implementation measures. Springfield Development Code Goal 5 and Water Quality Limited Waterway protection implementation measures will automatically be applied to protect inventoried resource sites when the UGB expansion is acknowledged and the lands become subject to the applicable Springfield Development Code provisions implementing Goal 5. Any subsequent changes to land use designations must comply with the applicable provisions of Goal 5 and interpretive rules.

> *"(5) Local governments are required to amend acknowledged plan or land use regulations at periodic review to address Goal 5 and the requirements of this division <u>only if one or more</u> of the following conditions apply, unless exempted by the director under section (7) of this rule…"*(emphasis added)

The City is not in periodic review.

> *"(a) The plan was acknowledged to comply with Goal 5 prior to the applicability of OAR 660, Division 16, and has not subsequently been amended in order to comply with that division;"*

<u>Previously acknowledged Metro Natural Resources Inventory and land use regulations comply with Division 16.</u> The Metro Natural Resources Inventory was acknowledged in 2005, after applicability of OAR 660, Division 16 and has been amended in 2011 (Glenwood)[14]. OAR 660-023-0250(5)(a) is not triggered.

> *"(b) The jurisdiction includes riparian corridors, wetlands, or wildlife habitat as provided under OAR 660-023-0090 through 660-023-0110, or aggregate resources as provided under OAR 660-023-0180; or…*

[14] Springfield Ordinance 6265/ Lane County Ordinance PA1227 updated the Wetland Inventory, Inventory of Natural Resource Sites, and Natural Resource Study to include the Glenwood wetland and riparian sites.

Springfield's jurisdiction includes riparian corridors, wetlands, or wildlife habitat as provided under OAR 660-023-0090 through 660-023-0110, or aggregate resources as provided under OAR 660-023-0180, as identified in the previously acknowledged Metro Natural Resources Inventory and land use regulations that comply with Division 16. OAR 660-023-0250(5)(b) is triggered.

> *(c) New information is submitted at the time of periodic review concerning resource sites not addressed by the plan at the time of acknowledgement or in previous periodic reviews, except for historic, open space, or scenic resources."*

Based on Lane County's inventory and City analysis, the Springfield Goal 5 inventory will need to be updated to include the UGB expansion areas to address the boundary changes and to address resource sites (if any) in the expansion areas not addressed by the plan at the time of the last period review work task acknowledgement. For example, Lane County's plan identifies National Wetland Inventory wetland resources within the UGB expansion areas. Prior to urbanization, the Local Wetland Inventory, Inventory of Natural Resource Sites, and Natural Resource Study will need to be updated for the areas added to the UGB. For example, the City conducted a similar process for the Glenwood area in 2011, as the Glenwood Refinement Plan amendments were being prepared. Thus the 2030 Plan includes Urbanization Element policies 47 and 48:

2030 Plan Urbanization Element Policy 47 states:

> ***"Prior to approval of a plan amendment or zone change that permits urban development within the North Gateway or Mill Race District urbanizable lands, the Springfield Local Wetland Inventory shall be updated in accordance with Statewide planning Goal 5 and Goal 5 administrative rules requirements."***

<u>2030 Plan requires a *Local* Wetland Inventory prior to urban development in UGB expansion areas.</u> The following information is provided to explain why 2030 Urbanization Element Policy 47 is required. A wetlands inventory is a systematic survey of a fairly large geographic area to locate and map wetlands and classify them by type (for example, forested wetland or wet prairie). Many different inventory methods may be used, ranging from remote sensing (using aerial photography or satellite imagery) to on-the-ground surveys. The appropriate type of inventory method depends upon the intended uses, size of area to be covered, and available funds. There are two types of wetlands inventories that comprise the State Wetlands Inventory: the National Wetlands Inventory (NWI) and the Local Wetlands Inventory (LWI).

It is important to note that Lane County's plan identifies *National* Wetland Inventory wetland resources within the Springfield UGB expansion areas.

> *"The NWI was developed by the U.S. Fish and Wildlife Service and covers the entire country. It relies on high-altitude aerial photos, with limited field work. <u>While the NWI is extremely useful for many resource management and planning purposes, its small scale,</u>*

accuracy limitations, age (1980s), and absence of property boundaries make it unsuitable for parcel-based decision making."[15] (emphasis added)

"To augment the NWI in urban and urbanizing areas where more detailed inventory information is needed, the Department of State Lands (DSL) developed guidelines and rules for Local Wetlands Inventories. An LWI aims to map all wetlands at least 0.5 acres or larger at an accuracy of approximately 25 feet on a parcel-based map. Actual map accuracy varies, and areas that could not be field verified will be less accurate. (The LWI is not a substitute for a detailed delineation of wetland boundaries.) The LWI maps and report provide information about the inventory area and the individual wetlands, including:

- *Total acreage of wetlands in the inventory area*
- *Acreage of each wetland type in the inventory area (e.g., 18 acres of forested wetland)*
- *Location, approximate size, and classification (type) of each wetland mapped*
- *A description of each mapped wetland*
- *A functions and condition assessment of all mapped wetlands*
- *All tax lots containing wetlands*

Once an inventory is completed and approved by DSL, there are certain requirements and implications:

An approved LWI is incorporated into the SWI and is made available by DSL to other agencies and the public. Wetlands and waterways, regardless of whether or not they are mapped, may be regulated under the State Removal-Fill Law. If ground-altering site work is proposed, a more precise wetland boundary may need to be located (a "delineation") to know where state permit requirements apply. Compliance with wetland and waterway regulations remains the responsibility of the landowner."

Under Statewide Planning Goal 5, Springfield *must conduct an LWI and wetland function and condition assessment (in compliance with OAR 141-086-0180 to 0240 procedures for conducting LWIs), and then must identify locally significant wetlands (LSW). DSL adopted rules for how LSWs are identified, using information from the LWI. A protection program is then adopted by the local government to further guide the management of LSWs.*

An approved LWI must be used by the local government (in place of the NWI) for the Wetland Land Use Notification process (a local-state coordination process)." (emphasis added).

"Local Wetland Inventories (LWI) provide a planning tool for balancing the protection of wetland functions that are of value to a community with community development needs.

[15] From http://www.oregon.gov/dsl/WETLAND/docs/fact2_2004.pdf

A LWI is also required as base information for city or county Goal 5 (Natural Resources) wetland protection programs. Advance information on the location of wetlands helps to avoid last-minute delays when beginning development or conducting real estate transactions."[16]

2030 Plan Urbanization Element Policy 48 states:

"Prior to approval of a plan amendment or zone change that permits urban development within the North Gateway or Mill Race District urbanizable lands, the Springfield Natural Resources Inventory shall be updated in accordance with Statewide planning Goal 5 and Goal 5 administrative rules requirements and the Springfield Natural Resources Study shall be amended. The inventory process shall map the resource areas, determine significance, and adopt a list of significant resource sites as part of the comprehensive plan and land use regulations. More precise field surveys to locate top of bank and to monument riparian area setbacks are required prior to site plan approval and issuance of building permits."

"(6) If a local government undertakes a Goal 5 periodic review task that concerns specific resource sites or specific Goal 5 plan or implementing measures, this action shall not by itself require a local government to conduct a new inventory of the affected Goal 5 resource category, or revise acknowledged plans or implementing measures for resource categories or sites that are not affected by the work task."

Although the City is not in periodic review, the follow-up process to conduct the Local Wetland Inventory, Inventory of Natural Resource Sites, and Natural Resource Study updates in specific areas, including specific UGB expansion areas, prior to urbanization will not by itself require Springfield to conduct a new inventory of the affected Goal 5 resource category, or revise acknowledged plans or implementing measures for resource categories or sites that are not affected by the work task.

"(7) The director may exempt a local government from a work task for a resource category required under section (5) of this rule. The director shall consider the following factors in this decision:

(a) Whether the plan and implementing ordinances for the resource category substantially comply with the requirements of this division; and

(b) The resources of the local government or state agencies available for periodic review, as set forth in ORS 197.633(3)(g)."

The City is not in periodic review. However, if applicable, the City requests Director exemption under OAR 660-023-0250(7)(a) and (b). 2030 Urbanization Element policies 47 and 48 ensure that thorough, updated Goal 5 analysis will be conducted prior to zoning that allows urban development. To conduct

[16] Ibid.

the Goal 5 update prior to UGB amendment adoption would be premature and would be predetermining outcome of UGB Alternatives Analysis prior to completion of public review process, in violation of Goal 1. At a meeting on July 22, 2015 in Salem, DLCD staff concurred with the City's approach to Goal 5 compliance.

Springfield's acknowledged plans to address Goal 5 are the Metro Natural Resources Study (UGB expansion areas) and Springfield Natural Resources Study (inside the existing UGB and NR features located along the boundary).

Springfield's jurisdiction includes riparian corridors, wetlands, or wildlife habitat as provided under OAR 660-023-0090 through 660-023-0110 or aggregate resources as provided under OAR 660-023-0180; or (c) New information is submitted at the time of periodic review concerning resource sites not addressed by the plan at the time of acknowledgement or in previous periodic reviews, except for historic, open space, or scenic resources. Therefore, Subsection (5) is triggered, unless exempted by the director under section (7):

Springfield's proposal addresses Goal 5 by amending the acknowledged plan. The proposed UGB amendment addresses Goal 5 through Springfield 2030 Urbanization Element policies and through implementation of existing land use regulations in the newly urbanizable areas added to the UGB.

OAR 660-023-0140 Groundwater Resources

Drinking water protection. The proposed UGB expansion areas comprise environmentally sensitive Drinking Water Source Areas that provide the City of Springfield's drinking water. Development within Drinking Water Source Areas is subject to the Springfield Development Code Drinking Water Protection (DWP) Overlay District[17], which will automatically apply when the UGB is amended. The DWP Overlay District "is established to protect aquifers used as potable water supply sources by the City from contamination."[18] The DWP Overlay District was established in 2000, "*establish*ing *procedures and standards for the physical use of hazardous or other materials harmful to groundwater within TOTZ (time of travel zones) by new and existing land uses requiring development approval.*" The DWP Overlay District accomplishes protection "*by including methods and provisions to*

- *Restrict or prohibit the use of hazardous or other materials which are potential groundwater contaminants;*
- *Set standards for the storage, use, handling, treatment, and production of hazardous or other materials that pose a risk to the groundwater within TOTZ; and*
- *Review new or expanded uses of hazardous or other materials that pose a risk to groundwater."*[19] [20]

[17] Springfield Development Code 3.3-200
[18] Ibid, SDC 3.3-205
[19] SDC 3.3-205B.

Springfield's Drinking Water Protection program is recognized nationally as a successful model groundwater protection program. The Springfield Drinking Water Protection Plan was adopted May 17, 1999. The public water system[21] serves over 10,000 Oregon citizens, thus the Springfield Drinking Water Protection Area is a "statewide significant resource" under the state land use program.[22]

<u>2030 Plan requires specialized drinking water protection standards to be developed for the North Gateway and Mill Race UGB expansion areas to protect the aquifer system.</u> OAR 660-023-0140(1)(c) Groundwater Resources states that to "*"protect significant groundwater resources" means to adopt land use programs to help ensure that reliable groundwater is available to areas planned for development and to provide a reasonable level of certainty that the carrying capacity of groundwater resources will not be exceeded.*" OAR 660-023-0140(1)(e) defines "Wellhead protection area" as *"the surface and subsurface area surrounding a water well, spring, or wellfield, supplying a public water system, through which contaminants are reasonably likely to move toward and reach that water well, spring, or wellfield."*

A 2013 study of the Willamette Wellfield aquifer system provides explanation of the hydrologic connection between the aquifer and surface water in the proposed Mill Race District UGB expansion area.

> *"Given the unconfined nature of the aquifer and groundwater-level response in neighboring wells to changes in stream stage (CH2M HILL, 1982), the alluvial aquifer is known to be in hydraulic connection with area surface water features. Those features include the Willamette River, Mill Race, Gorrie Creek, Quarry Creek, and the channels moving water to the west away from the filtration plant dewatering system. Streambed sediments are permeable and allow recharge to the alluvial aquifer. During periods when the surface water features (other than the Willamette River or Mill Race/Gorrie Creek) are dry, groundwater levels decline and wellfield capacity drops by nearly half (Western Groundwater Services, 2007). Groundwater that moves downgradient through the aquifer and is not captured by wells continues to move through the groundwater system discharging eventually to the Willamette River*" (Golder Associates, 1995). [GSI Water Solutions, Inc. Geologist Technical Memorandum to Springfield Utility Board, October 29, 2013 paper, page 6]

The 2030 Plan expands the UGB and designates land as "Urban Holding Area- Employment (UHA-E), and Public/Semi-Public." Over the 20-year planning period, lands designated UHA-E will transition from rural to urban and be developed with urban industrial and other employment uses or public/semi-public uses.

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[20] SDC 3.3-215 states: "the degree of aquifer protection required in this Section is based on scientific and engineering considerations."

[21] As defined in OAR 660-023-0140(1)(d) "Public water system" is a system supplying water for human consumption that has four or more service connections, or a system supplying water to a public or commercial establishment that operates a total of at least 60 days per year and that is used by 10 or more individuals per day.

[22] Nov. 29, 1999 letter DEQ Drinking Water Protection

Therefore, land use planning and development regulations applicable to the UGB expansion areas must be coordinated to ensure that Springfield's Drinking Water Source Areas are protected.

2030 Plan Urbanization Element Policy 51 states:

> ***"Grow and develop the City in ways that will to ensure the stability of Springfield's public drinking water supply to meet current and future needs.***
>
> - ***Prior to City approval of annexation, land division or site development in the North Gateway and Mill Race UHA-E districts, the City — in partnership with Springfield Utility Board — shall conduct a Springfield Development Code Amendment process to prepare and apply specialized development standards that protect Drinking Water Source Areas to urbanizable lands designated UHA-E to ensure that new development contributes to a safe, clean, healthy, and plentiful community drinking water supply. The standards shall identify design, development, construction and best management processes appropriate and necessary to maintain aquifer recharge and protect drinking water quality and quantity. The standards shall also identify land use buffers appropriate and necessary to protect the Willamette Wellfield and the surface water features that are known to be in hydraulic connection with the alluvial aquifer.***
>
> - ***Continue to Update the Springfield Comprehensive Plan and Springfield Development Code as new natural hazards information becomes available.***
>
> - ***Encourage increased integration of natural systems into the built environment, such as vegetated water quality stormwater management systems and energy-efficient buildings."***

<u>Cultural and Historic Resources.</u> The City reviewed SHPO records of cultural and historic resources within the expansion areas. There is one listing on the State's Inventory of Historic Structures and Sites that is located in the Mill Race District. The site is shown to be ineligible. There are no listings for the Gateway area.

The City also reviewed Lane County's list of Historic Structures and Sites (Lane Code 11.030, Updated 8/09/02). No structures or sites in the expansion areas were listed. Section 11.030 was subsequently removed from the Lane Code and "Historic Structures and Sites" are now defined in LC 11.300-10 as "Property currently listed in the National Register of Historic Places, established and maintained under the National Historic Preservation Act of 1966 (PL 89-655) (See LM 11.300) (Revised by Ordinance No. 10-82, Effective 7.9.82)."

No known Goal 5 cultural and historic resources will affected by this proposal.

Goal 5 Conclusion: The 2030 Plan amendments are in compliance with the applicable provisions of Goal 5.

Statewide Planning Goal 6: Air, Water and Land Resources Quality

OAR 660-015-0000(6)
To maintain and improve the quality of the air, water and land resources of the state

Goal 6 addresses compliance with federal and state environmental quality statutes, and how this compliance is achieved as development proceeds in relationship to air sheds, surface water features and groundwater resources, watershed basins and land resources. Springfield and the Eugene-Springfield Metropolitan area have existing programs in place to maintain and improve the quality of the air, water and land resources of the state.

Springfield's Environmental Services Division (ESD) coordinates the City's and Metro region's compliance with applicable federal and state environmental quality statutes. ESD promotes and protects the public's health, safety, and welfare by providing professional leadership in the protection of the local environment, responsive service to service recipients, and effective administration of the Regional Wastewater Program. ESD maintains compliance with Goal 6 through multiple programs including:

Water Resources Programs

- implementing the City's National Pollutant Discharge Elimination Systems (NPDES) stormwater discharge permit;
- coordinating the City's Endangered Species Act response;
- implementing the Stormwater Facilities Master Plan in conjunction with the City's Engineering Division.

Industrial Pretreatment Program

- regulating Significant Industrial Users (SIUs) of the regional wastewater system through permits;
- administrating the Pollution Management Practice programs.

Wastewater & Stormwater (Sewer & Drainage) Programs

- implementing local sewer user and stormwater rates and Systems Development Charges (SDCs);
- Public Education and Outreach to inform residents, businesses, and industries about urban stormwater runoff and pollution prevention;
- Public Participation to involve the public in the stormwater planning process;
- Illicit Discharge of Contaminants – to address illegal or illicit dumping of pollutants, whether accidental or intentional;
- Construction Site Runoff - working with contractors and developers where land clearing or construction may result in erosion, sedimentation, and soil loss;

- Post-Construction Erosion Control - ensures that new developments "build in" features (such as bio-swales) to continuously manage water quality in the future
- Good Internal Housekeeping - assessing the City's own maintenance practices and policies to ensure that work crews use the best practices to minimize pollution in their everyday tasks.

Wastewater generated in the Eugene/Springfield metropolitan area is cleaned at the regional wastewater treatment facility. Pollution is controlled at the source through pretreatment programs located both in Springfield and Eugene. These regional industrial wastewater pretreatment programs are designed to protect the environment and the area's wastewater collection and treatment facilities by regulating potentially contaminated wastewater discharges from commercial and industrial activities.

Regulatory activities include developing pollutant limits for industrial discharges, responding to permit violations, and conducting industrial site inspections. The City of Springfield Pretreatment Program works closely with business and industry to control pollutants discharged into the wastewater treatment system; control spills and illicit discharges; and promote pollution prevention and recycling.

The City of Springfield provides Metropolitan Wastewater Management Commission (MWMC) administration, including: legal and risk management services; financial management and accounting; budget and rate development; billing and customer service; public information, education, and citizen involvement programs. Springfield also provides long-range capital planning, and design and construction management for the regional facility. For more information visit the MWMC website.

Pursuant to the Intergovernmental Agreement between the City of Springfield and Lane County, Springfield ESD provides a subset of environmental services within the unincorporated urbanizable area.

Lane Regional Air Pollution Authority LRAPA and the U.S. Environmental Protection Agency (EPA) are responsible for monitoring and regulating air quality and air pollution discharges. The Lane Regional Air Protection Agency was created in 1968 to achieve and maintain clean air in Lane County, Oregon in a manner consistent with local priorities and goals. With the support of its member entities, which include Lane County and the cities of Eugene, Springfield, Cottage Grove and Oakridge, LRAPA carries out its mission to protect and enhance air quality through a combination of regulatory and non-regulatory programs and activities. The agency plays an active role in community development and planning, and works collectively with other local governments and community groups to help achieve federal Clean Air Act goals and objectives.

The EPA delegates authority to the Oregon Department of Environmental Quality (DEQ) to operate federal environmental programs within the state such as the federal Clean Air, Clean Water, and Resource Conservation and Recovery Acts. DEQ is responsible for protecting and enhancing Oregon's water and air quality, for cleaning up spills and releases of hazardous materials, for managing the proper disposal of hazardous and solid wastes, and for enforcing Oregon's environmental laws. DEQ staff use a combination of technical assistance, inspections and permitting to help public and private facilities and citizens understand and comply with state and federal environmental regulations.

The Oregon Department of State Lands is the administrative agency of the State Land Board responsible for sound stewardship of the state's lands, wetlands, waterways. It is the lead state agency responsible for the protection and maintenance of Oregon's wetlands resources through its administration of the state´s removal-fill law, which protects Oregon's waterways and wetlands from uncontrolled alteration.

203 Plan Urbanization Element Policy 52 addresses air quality:

> ***"Grow and develop the City in ways that maintain and improve Springfield's air quality to benefit public health and the environment.***
>
> - ***Prioritize and seek funding for mixed use land use district planning and multi-modal transportation projects that reduce reliance on single occupancy vehicles (SOVs) consistent with Springfield Transportation System Plan (TSP) Policy 1.2, 1.3 and 1.4.***
> - ***Coordinate land use and transportation system planning for urbanizable lands at the refinement plan and/or Master Plan level to identify and conceptually plan alignments for locating multi – modal facilities.***
> - ***Plan, zone and design transportation systems in the North Gateway and Mill Race Urban Holding Area - Employment districts to provide multi-modal transportation choices for district employees.***
> - ***Promote the use of active transportation systems as new growth areas and significant new infrastructure are planned and developed."***

Goal 6 is addressed in Metro Plan Environmental Resources Element, pages III-C-15 toC-17 Air, Water and Land Resources Quality. The 2030 Plan amendments are consistent with these Metro Plan policies. The 2030 Plan amendments do not directly permit new land uses or changes in land uses and thus have no direct effect on or applicability to this goal. Any actions affecting land use or development that occur as a result of the 2030 Plan amendments are subject to the applicable goals, statutes and rules at the time those actions are undertaken.

Goal 6 Conclusion. Existing local, regional, state and federal programs and facilities exist to prevent discharges from threatening to violate, or violate applicable state or federal environmental quality statutes, rules and standards. The proposed 2030 plan amendments do not alter the City and region's acknowledged compliance with Goal 6.

Statewide Planning Goal 7: Areas Subject To Natural Hazards

OAR 660-015-0000(7)
To protect people and property from natural hazards

The Metro Plan and the City's development code are acknowledged to be in compliance with all applicable statewide land use goals, including Goal 7. Goal 7 requires local governments to address natural hazards within their comprehensive land-use plans. For the purposes of Goal 7, natural hazards include floods, landslides, earthquakes and related hazards, tsunamis, coastal erosion, and wildfires. Comprehensive plans address Goal 7 natural hazard planning through inventories, policies, mapping, ordinances and other implementing measures. Local land use plans guide development in hazardous areas with the overall goal of avoiding or minimizing risks to people and property from natural hazards.

Springfield has existing programs, policies, zoning overlay districts, and development standards to regulate development in areas subject to natural hazards to address threats posed by natural hazards to people and property. The City of Springfield implements Metro Plan policies and Goal 7 as it relates to land use planning and development through the Springfield Development Code:

- Floodplain Overlay District SDC 3.3-400
- Hillside Development Overlay District SDC 3.3-500

New development within the UGB — including interim development and future development of urbanizable lands added to the UGB through adoption of the proposed 2030 plan UGB amendment — is subject to the Springfield Development Code, including all applicable overlay districts.

The 2030 Plan amendments do not alter existing development standards applicable in areas subject to natural hazards. The 2030 Plan amendments will be implemented through those acknowledged programs, policies, zoning overlay districts, and development standards.

The City's CIBL/EOA land inventory identified "floodway" and slopes >15% as "absolute constraints." These two development constraints are related to Goal 7 natural hazards. Portions of tax lots in the floodway and with slopes >15% were assumed unsuitable for the purposes of the inventory.

OAR 660-009-0005(2) provides the following definition of "development constraints:"

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

The Administrative Rule provides a broad definition of constraints and leaves discretion for local governments in the application of the definition. Absolute constraints were deducted from the buildable portion of lots as they were determined to be factors that temporarily or permanently limit or prevent the use of land for economic development as defined in OAR 660-009-0005(2). For the purpose of the CIBL/EOA inventory, ECONorthwest used the following data sources were used to identify floodway and slope constraints:

- Floodway – Source: Army Corps of Engineers digital "FIRM" maps. File used: fld_way.shp

- Slopes over 15% - Source: 10 meter digital elevation model (DEM). File used: slopes_over_15.shp

Flood way and slopes greater than 15 percent are considered constrained for the purposes of the buildable lands inventory.

For the purposes of the UGB Boundary Location Alternatives Analysis, City staff used LCOG's Regional Data Base, FEMA maps, and the City's high resolution GIS topographic data (LIDAR) to identify and map constraints, and as explained in the City's findings under OAR 660-024-0060, the UGB Alternatives Analysis of potentially suitable employment land sites referenced the 2016 DOGAMI SLIDO maps of landslide hazards as part of the City's assessment of buildable lands, in addition to application of the slopes constraint.

Springfield's existing UGB and the proposed UGB contain land in the floodplain and floodway. As currently mapped by the Federal Emergency Management Agency (FEMA), all of the North Gateway UGB expansion area is within the 100-year flood plain of the McKenzie River. A portion of the North Gateway UGB expansion area is in the floodway. As currently mapped by the Federal Emergency Management Agency (FEMA), portions of the Mill Race UGB expansion area is within the 100-year flood plain of the Middle Fork Willamette River. Most of this land is in public ownership.

Metro Plan Policy C.31 states:

> *"When development is allowed to occur in the floodway or floodway fringe, local regulations shall control such development in order to minimize the potential danger to life and property. Within the UGB, development should result in in-filling of partially developed land. Outside the UGB, areas affected by the floodway and floodway fringe shall be protected for their agricultural and sand and gravel resource values, their open space and recreational potential, and their value to water resources."* (III-C-16)

Springfield Development Code 3.3-420C. states that development is prohibited in the floodway unless certification by an engineer or architect is provided demonstrating that encroachments, including fill, new construction, substantial improvements, and other development will not result in any increase in flood levels during the occurrence of the base flood discharge. Replacement of structures already in the floodway is permitted if they are located in the same site and are the same size without the certification.

As shown in Ordinance Exhibit A, the 2030 Plan amendments designate the portion of the North Gateway UGB expansion area within the floodway as "Natural Resource."

Springfield and Lane County previously adopted implementing measures to reduce risk to people and property from flood hazards within Springfield's UGB. These measures are contained in Springfield Development Code 3.3-400 Floodplain Overlay District and are based on the Oregon Model Flood Damage Prevention Ordinance approved by the Federal Emergency Management Agency (FEMA).

Springfield Development Code 3.3-420A. and B. state that development may occur in areas of special flood hazard if certain development standards for construction of buildings and streets are met.

Springfield Development Code 3.3-420D. states that the cumulative effect of any proposed development, when combined with all other existing and anticipated development, shall not increase the water surface elevation of the base flood more than 1 foot at any point.

Urban and urbanizable land within all areas of special flood hazard as mapped by FEMA is subject to the Floodplain Overlay District development standards (Springfield Development Code 3.3-400 Floodplain Overlay District) in place at the time development occurs.

Landslide hazards. The UGB expansion avoids sloped lands because the needed employment site characteristics are sites with flat topography.

As recommended in Goal 7 Guideline B.2. Springfield requires site-specific reports, appropriate for the level and type of hazard (e.g., hydrologic reports, geotechnical reports or other scientific or engineering reports) prepared by a licensed professional to be submitted with development requests in high hazard areas. Such reports evaluate the risk to the site as well as the risk the proposed development may pose to other properties.

Metro Plan Policy C.32 Local governments shall require site-specific soil surveys and geologic studies where potential problems exist. When problems are identified, local governments shall require special design considerations and construction measures to be taken to offset the soil and geologic constraints present, to protect life and property, public investments, and environmentally-sensitive areas.

Springfield and Lane County previously adopted land use regulations to regulate the development of buildings and streets in hillside areas. These existing implementing measures in Springfield Development Code 3.3-500 Hillside Development Overlay District regulate development to ensure that development minimizes the potential for earth movement and resultant hazards to life and property and provides adequate access for emergency services.

Hillside Development Overlay District standards are applicable in residential zoning districts above 670 feet in elevation OR to development areas below 670 feet in elevation where any portion of the development area exceeds 15 percent slope. The City requires special reports (Geotechnical Report, Grading Plan report, Vegetation and Revegetation Report, Verification of Slope and Grade Percentages, a Development Plan report), special engineering requirements, and fire protection requirements for development approvals in these areas.

Development of this land is subject to Springfield Development Code 3.3-500 Hillside Development Overlay District standards.

The cities of Eugene and Springfield updated the *Multi-jurisdictional Natural Hazards Mitigation Plan* (NHMP) in 2014 to identify natural hazard preparedness. This work was performed in partnership with the Oregon Partnership for Disaster Resilience with funding from the Federal Emergency Management

Agency (FEMA) Pre-Disaster Mitigation Grant Program. The natural hazards mitigation plan provides the Springfield community with a set of goals, action items, and resources designed to reduce risk from future natural disaster events.

The City and its Lane Livability Consortium partners recently conducted a planning process funded by a HUD Livable Communities grant to increase community resiliency. A resilient community is one that understands and is prepared for natural hazards and other uncertainties. Preparation starts with an understanding of vulnerabilities. The Lane Livability Consortium toolkit presents tools and results for assessing vulnerability. The findings of the completed assessment are used to inform natural hazards planning and other planning, risk management, and investment decisions.

The *Eugene Springfield Multi-Jurisdictional Emergency Operations Plan* is an all-hazards plan which outlines how the cities of Eugene and Springfield will prepare for and respond to emergencies. The purpose of the plan is to establish a comprehensive approach to protect the life, safety and health of the community. The Basic Plan describes how the cities' emergency management systems are organized and provides a framework for collaboration and coordination in order to provide the most efficient and effective use of resources during emergencies and major disasters. The Basic Plan also supports and facilitates emergency management coordination at the federal, state, and county levels.

Goal 7 Conclusion: Springfield 2030 Comprehensive Plan policies and the existing implementing measures contained in the Springfield Development Code 3.3-400 Floodplain Overlay District have been adopted by Springfield and Lane County to reduce risk to people and property from natural hazards. The proposal addresses flood hazards in compliance complies with Goal 7. Springfield 2030 Comprehensive Plan policies and the existing implementing measures contained in the Springfield Development Code 3.3-500 Hillside Development Overlay District have been adopted by Springfield and Lane County to reduce risk to people and property from natural hazards. The 2030 Plan amendments are in compliance with Goal 7.

Statewide Planning Goal 8: Recreational Needs

OAR 660-015-0000(8)

To satisfy the recreational needs of the citizens of the state and visitors and, where appropriate, to provide for the siting of necessary recreational facilities including destination resorts.

Goal 8 requires planning to meet recreation needs "now and in the future" by governmental agencies having responsibility for recreation areas, facilities and opportunities: (1) in coordination with private enterprise; (2) in appropriate proportions; and (3) in such quantity, quality and locations as is consistent with the availability of the resources to meet such requirements. Goal 8 requires State and federal agency recreation plans to be coordinated with local and regional recreational needs and plans. Goal 8 guidelines recommend inventories to determine recreation needs in the planning area," based on adequate research and analysis of public wants and desires." "Long range plans and action programs to meet recreational needs should be developed by each agency responsible for developing comprehensive plans."

Metro Plan IIIH Parks and Recreation Facilities Element policy H.2 states:

> *"Local parks and recreation plans and analyses shall be prepared by each jurisdiction and coordinated on a metropolitan level. The park standards adopted by the applicable city and incorporated into the city's development code shall be used in local development processes."* (Page III-H-4)

Springfield's acknowledged Goal 8 Comprehensive Plan element is the Willamalane Park and Recreation Comprehensive Plan.

Public land UGB amendment. The 2030 Plan amendments expand the UGB to encompass certain existing publicly-owned lands, parks, open space and public facilities that are currently located outside of the UGB. The purpose of the public land expansion is to plan designate and zone those lands to protect critical publicly-owned natural resources, parks and facilities therein and to facilitate the efficient planning and management of these lands to benefit Springfield's residents. Bringing these public lands owned by the City, Willamalane Parks and Recreation (the City's park and recreation service provider agency) and Springfield Utility Board into the UGB recognizes the need to provide urban services — including Policing and Fire and Life Safety services to protect the health, safety and welfare of the public. The 2030 Plan Public Land, Parks and Open Space UGB expansion includes:

- Certain SUB/City public land including Springfield Utility Board's Willamette Well Field drinking water source area and drinking water treatment facility south of South 28th Street and the Springfield Mill Race as mapped and listed in Ordinance Exhibit A; and

- Certain Willamalane Parks and Open Space lands as mapped and listed in Ordinance Exhibit A.

Willamalane Park and Recreation District (WPRD) is designated in the Eugene-Springfield Metropolitan Area General Plan as the park and recreation service provider for Springfield and its urbanizable area. Willamalane is a special service taxing district with the authorization to purchase, develop and maintain park facilities, but it has no authority or obligation for Goal 8 compliance; that responsibility lies with the City of Springfield after coordinating with the Park District.

Willamalane owns 783 acres of land (recent acquisitions not included), 37 facilities, seven community recreation and support facilities, and three undeveloped properties in the greater Springfield area. The planning area for Willamalane's 20-year Park and Recreation Comprehensive Plan is generally defined by Springfield's urban growth boundary (UGB). There are a few minor exceptions to this circumstance where the district boundary is outside the UGB. In those cases the Willamalane's planning area is defined by the district boundary. In addition, the district's boundary generally coincides with the Springfield city limits, but there are some instances where the district boundary is outside the city limits and UGB. Developed areas annexed by the City of Springfield are automatically annexed to the District.

Park and Recreation Community Needs Assessment. As part of the update to Willamalane's Park and Recreation Comprehensive Plan (Comprehensive Plan) an extensive community needs assessment was completed.[23] The Community Needs Assessment included public involvement activities such as surveys and workshops in which community input was solicited from a range of cohort groups. Information on parks and facilities, recreation services, and maintenance and operations was gathered to identify future needs for park and recreation services and infrastructure to meet a growing population.

The district population forecast is the same as the forecast used by the City of Springfield for the residential buildable lands study. Over the next 20 years, the population is projected to increase by 22 percent within the Willamalane planning area. As such, Willamalane will have to increase services, parks and facilities just to maintain the current level of service for the planning area.

Willamalane uses a parkland standard of 14.00 acres per 1,000 residents. Based on this standard, 160 additional acres of parkland are currently needed. By 2030, that total increase to 364 acres. The future parkland need of approximately 364 acres includes 68 acres of Neighborhood Parks, 102 acres of Community Parks, and 194 acres of Natural Area.

Willamalane Comprehensive Plan Map 2 lists proposed park and recreation projects. In the proposed Mill Race UGB expansion area, the following park projects are proposed:

- establishing Georgia Pacific Park as a natural area;
- establishing Clearwater Park as a special use park;
- completion of the Middle Fork multi-use path; and
- construction of the Millrace multi-use path.

The proposed UGB expansion will also include the following Willamalane properties in north Springfield:

- the Oxbow;
- Lively Park; and
- Ruff Park.

There are five (5) existing parks currently outside the existing UGB that Willamalane has requested to include within the UGB. These parks are:

1. Weyerhaeuser-McKenzie Natural Area Park (Tax Lots 17022900002901, 1702300000401). These tax lots are approximately 55 acres in size. The City of Springfield transferred this property to Willamalane in October of 2013. This natural area is one of a few locations in Springfield that offers potentially ADA accessibility to the McKenzie River. Currently the site is improved with an informal parking area, an internal access road and bridge, and a well field operated by Springfield Utility Board. Willamalane has plans to improve the area with a formal parking area and universal access to the water. These plans are consistent with the *McKenzie River Oxbow Natural Area Master Plan* (the master plan for this natural area) as approved by the City of

[23] Willamalane Park and Recreation Comprehensive Plan, Appendix A

Springfield on June 18, 2001. Willamalane has plans to complete restoration of the property consistent with recommendations in the Master Plan. In addition, the use of this property as a natural area park and creating an accessible connection to the McKenzie River is consistent with the Willamalane Comprehensive Plan and its Community Needs Assessment.

2. Jack B. Lively Memorial Park (Lively Park) (Tax Lot 1702270001101). This park is a community park and is approximately 32 acres in size. A portion of the park is currently outside the UGB. The park is improved with SPLASH, a regional recreational pool facility, a playground, basketball court, sand volleyball court, walking trails, two picnic shelters and a dog park. The tax lot proposed to be included in the UGB is 9.74 acres in size and currently contains soft-surface walking trails, a footbridge, and the north portion of the dog park, consistent with the 2005, Lively Park Master Plan. Willamalane does not have any plans to further develop this area. The existing trail system on the 9.74 acre parcel is consistent with the Jack B. Lively Memorial Park Master Plan and the Willamalane Comprehensive Plan and Community Needs Assessment to provide additional opportunities for walking.

3. Ruff (Wallace M Jr.) Memorial Park (Tax Lots 1702270001502, 1702341115500). This park is a special use park and is 9.79 acres in size. It is located at 1161 66th Street in the Thurston area of Springfield. The park can be accessed from 66th Street and via a pedestrian path from Jacob Lane, which is to the south of the park. The park is currently improved with walking trails, extensive planting of Magnolia trees, and a foot bridge over Cedar Creek. In the spring of 2013 Willamalane acquired Tax Lot 1702341115500, which is 6.1 acres in size and is south of the existing Ruff Park. Although Willamalane does not currently have plans to develop this newly acquired land, any future development within the park, including the panhandle portion will be consistent with the park standards for special use parks per the Willamalane Comprehensive Plan and the Ruff Park master plan. Currently the park serves the residents within Levi Landing subdivision, which is immediately south of the park and within the UGB. Since Ruff Park serves the residents in the UGB, it should be in the UGB

4. Clearwater Park (Tax Lots 1802080000300, 1802080000400, 1802080000500, 1802080000600). This park is a special use park and is approximately 66 acres in size. The Park has been undergone many changes in the last 3-5 years. It was recently upgraded with a new boat ramp/landing, parking, restroom, park host site, and soft surface trails. The inlet and new channel for the Springfield Mill Race was developed in 2010. It is also the eastern trailhead for the 4-mile Middle Fork Path. Future use in the park is planned to include archery range, 9-hole disc golf, a nature play-ground, and additional soft surface trails. The park offers a place for recreating with family and friends and connecting with nature. The combination of the Middle Fork Willamette River, Springfield Mill Race and their diverse habitat types, presents an opportunity to enhance natural areas, water quality and wildlife habitat while concurrently providing outdoor education and recreation amenities for the people of Springfield. This is a unique destination in south Springfield.

5. Georgia-Pacific Park. This park is approximately 125 acres in size and is classified as a natural area park. The majority of Georgia-Pacific Park is already located within the UGB. Of the 125 acres, approximately 12 acres is outside the UGB. It is jointly owned by SUB, City of Springfield and Willamalane. Plans include developing the Mill Race Path through the park, connecting to the Middle Fork Path. The Comprehensive Plan, and agreements with SUB and the City, calls for the joint development of a management plan and master plan for the park. Having the entire park included in the UGB will facilitate a joint management approach to the park. Besides developing a portion of the Mill Race Path within Georgia-Pacific Park, Willamalane has no additional development plans. Willamalane staff has conceptualized this area for soft surface trails, and habitat restoration. This is a unique destination in south Springfield. By including this entire property in the UGB, the City is increasing Willamalane's service area within the UGB and within the City's jurisdiction, which is consistent with Willamalane being the park and recreation service provider for the City.

By including these properties within UGB, the City is increasing Willamalane's service area within the UGB and within the City's jurisdiction, which is consistent with Willamalane being the park and recreation service provider for the City.

By incorporating both Clearwater Park and all of Georgia-Pacific Park into the UGB, the City of Springfield incorporates a regional path system within its jurisdiction. The Middle Fork Path and the Mill Race Path (once completed), will be an eight mile multi-use path that connects downtown to the Middle Fork Willamette River.

The City is bringing into its jurisdiction an increased amount of natural area parks that offer the community the opportunity to access nearby waterways, unique vegetative habitats, and an expanding network of trails and paths.

The UGB line truncates several of these Parks: Lively, Ruff, G-Pacific Park. Currently, these portions of the parks are outside the UGB and Metro Plan boundary and are subject to the Lane Rural Comprehensive Plan and Lane Code. Amending the UGB so that the entire park is within the Metro Plan boundary and Springfield UGB facilitates consistent and efficient comprehensive planning and park management considerations.

Once within the UGB, it is anticipated that the public safety of the parks may increase since the City of Springfield will have planning jurisdiction over these parks and could provide for quicker response time for emergency services compared to County enforcement and emergency services.

The proposed UGB expansion provides a significant opportunity to meet the parkland need for existing and future residents and workers in Springfield, as well as the public at large.

In 2011, Springfield Ordinance 6268 was adopted and acknowledged. The ordinance adopted the Springfield UGB and the Springfield Residential Land and Housing Needs Analysis (RLHNA). The RLHNA identified a deficit of 300 acres of parkland.

The current, acknowledged Springfield UGB only partially addressed land needed for parks, open space and public facilities. Thus, the current UGB does not provide sufficient land for parks and open space, as identified in Springfield's Goal 8 Comprehensive Plan element — the Willamalane Comprehensive Plan.

The proposed UGB expansion addresses a portion of parkland and open space needs that can be met on publicly owned land adjacent to the existing UGB.

Springfield's review and amendment of the UGB to encompass existing publicly owned parks, open space and key public facilities land does not trigger simultaneous review and amendment of housing need or other category of land need. The lands in the UGB expansion are already designated and zoned Parks and Open Space, Agriculture in the Lane County Rural Comprehensive Plan – all non-urban, non-residential land located outside of the current UGB, therefore Springfield's buildable land inventory is not affected.

Therefore the proposed UGB amendment in consideration of one category of land need — certain public facilities, parkland and open space — is consistent with OAR 660-024-0040(3).

Goal 8 Conclusion: Amending the UGB and Metro Plan boundary to including existing Willamalane Parks and Open Space land is consistent with Goals 8 and 14.

Statewide Planning Goal 11: Public Facilities and Services

OAR 660-015-0000(11)
To plan and develop a timely, orderly and efficient arrangement of public facilities and services to serve as a framework for urban and rural development.

Goal 11 requires urban development to be guided and supported by types and levels of urban public facilities and services appropriate for, but limited to, the needs and requirements of the urban and urbanizable areas to be served. A provision for key facilities must be included in each plan. Jurisdictions are required to develop and adopt public facility plans for areas within urban growth boundaries.

The goal defines "*a timely, orderly and efficient arrangement*" as "*a system or plan that coordinates the type, locations and delivery of public facilities and services in a manner that best supports the existing and proposed land uses.*"

The goal defines "*urban facilities and services*" as "*key facilities and to appropriate types and levels of at least the following: police protection; sanitary facilities; storm drainage facilities; planning, zoning and subdivision control; health services; recreation facilities and services; energy and communication services; and community governmental services.*"

As recommended in Goal 11 guideline A.1, the Goal 14 administrative rules provide rules for coordinating plans providing for public facilities and services with plans for designation of urban boundaries, urbanizable land, and for the transition of rural land to urban uses.

OAR 660-024-0040 addresses how land needs for the 20-year planning period must be determined, including land needs for employment, transportation and public facilities.

OAR 660-024-0040(7)

> *"The determination of 20-year land needs for transportation and public facilities for an urban area must comply with applicable requirements of Goals 11 and 12, rules in OAR chapter 660, divisions 11 and 12, and public facilities requirements in ORS 197.712 and 197.768. The determination of school facility needs must also comply with 195.110 and 197.296 for local governments specified in those statutes."*

Conclusion Goal 11 Applicability. Goal 11 is applicable to the 2030 plan amendments as it relates to the City's determination of 20-year land needs for public facilities for the urban area. School facility needs are not addressed in the 2030 Plan amendments.

Metro Plan Public Facilities and Services Element. The City's 2030 Plan amendments rely upon the acknowledged Metro Plan policies, plans and findings to demonstrate Springfield's continued compliance with Goal 11 for Springfield's urban area. The Metro Plan III-G. Public Facilities and Services Element is the determination of 20-year land needs for transportation and public facilities for the lands within the Metro Plan boundary, including Springfield's urban and urbanizable areas.

The Springfield CIBL/EOA is the City's determination of 20-year land needs for employment. 20-year land needs for transportation and public facilities to serve employment and other uses will be accommodated via existing or planned facilities as identified in the Metro Plan Public Facilities and Services Element. The Metro Plan "Public Facilities and Services Element provides direction for the future provision of urban facilities and services to planned land uses within the *Metro Plan* Plan Boundary." (p. III-G-1)

The 2030 Plan amendments expand the UGB and Metro Plan boundary to meet long term employment needs and to bring existing public facilities, parks and open space into the City's UGB and Metro Plan boundary. The 2030 Plan amendment Ordinance Exhibit A amends both the Springfield UGB and the Metro Plan boundary within Springfield's jurisdictional area east of Interstate 5.

Lands within the existing UGB are subject to the Public Facilities and Services Element of the Metro Plan (Chapter IIIG), associated public facilities plans, policies, and existing acknowledged measures (Springfield Development Code land use regulations) that implement Public Facilities and Services Element of the Metro Plan (Chapter IIIG) plans and policies.

Lands added to the Springfield UGB and the Metro Plan boundary will be subject to the Public Facilities and Services Element of the Metro Plan (Chapter IIIG), associated public facilities plans, policies, and existing acknowledged measures (Springfield Development Code land use regulations) that implement Public Facilities and Services Element of the Metro Plan (Chapter IIIG) plans and policies.

2030 Plan establishes "holding area" designation and zoning allowing interim uses in UGB expansion areas consistent with Metro Public Facilities and Services Element. The 2030 Plan amendments plan and zone the UGB expansion areas new land uses within the *Metro Plan* plan boundary to allow agriculture uses, public facilities, parks and open space. These uses are the same uses the Metro Plan Public Facilities and Services Element assumed would occur in those areas.

At the time the Metro Plan Public Facilities and Services Element was acknowledged, the lands included in Springfield's UGB expansion were all within the Metro Plan Boundary[24]. The acknowledged Metro Plan Public Facilities and Services Element provides direction for the future provision of urban facilities and services to planned land uses within the *Metro Plan* Plan Boundary as planned at the time the Metro Plan Public Facilities and Services Element was acknowledged. Planned land uses for lands within Springfield's existing UGB — as articulated in the 2030 Plan amendments — are consistent with planned uses as designated in the acknowledged Metro Plan and as provided with services pursuant to the Metro Plan Public Facilities and Services Element. Planned land uses for lands in Springfield's UGB expansion areas were assumed to be agriculture uses, public facilities, parks and open space.

2030 Plan long term planned uses within the UGB expansion area are employment uses, public facilities, parks and open space. Lands planned to meet long term employment needs are designated Urban Holding Area-Employment (UHA-E) and zoned Agriculture—Urban Holding Area (AG), an urban transition holding zone. The existing uses on lands designated Urban Holding Area – Employment and zoned Agriculture are agricultural uses and associated farm dwellings. Urban uses are not permitted until after annexation. Lands planned for public facilities, parks and open space are designated Public/Semi Public and zoned Public Land and Open Space.

Public facility plans coordinate the type, locations and delivery of public facilities and services in a timely, orderly and efficient manner. Goal 11 requires cities to develop and adopt public facility plans that describe how urban development will be guided and supported by types and levels of urban public facilities and services appropriate for, but limited to, the needs and requirements of the urban and urbanizable lands within the urban growth boundary to be served. The public facility plan is a support document to the comprehensive plan that coordinates the type, locations and delivery of public facilities and services in a timely, orderly and efficient manner that best supports the existing and proposed land uses. Division 11 provides rules for developing public facility plans. The facility plan describes the water,

[24] A Metro Plan Boundary amendment initiated by Lane County was acknowledged in 2013. The result of that amendment was a Metro Plan Boundary east of Interstate 5 that is coterminous with Springfield's *existing* UGB. The City's 2030 Plan will expand the Metro Plan Boundary east of Interstate 5 to be coterminous with Springfield's *amended* UGB.

sewer and transportation facilities which are to support the land uses designated in the acknowledged comprehensive plan [OAR 660-015-0000(1)].

The designated interim "Urban Holding Area – Employment," the designated "Public/semi-public" and "Natural Resource" land uses in the 2030 Plan amendments are supported by the Metro Plan Public Facilities and Services policies and PFSP.

For the purposes of Goal 11, a water system is subject to regulation under ORS 448.119 to 448.285[OAR 660-015-0000(1)].

For the purposes of Goal 11, extension of a sewer or water system means the extension of a pipe, conduit, pipeline, main, or other physical component from or to an existing sewer or water system, as defined by Commission rules.

Goal 11 guideline 1 states that plans providing for public facilities and services should be coordinated with plans for designations of urban boundaries, urbanizable land, and the transition from rural land to urban uses.

The 2030 Plan Urbanization Element includes policies requiring timely coordination of public facilities planning with land use and transportation planning to guide the transition of lands added to the UGB from rural to urban.

Goal 11 guideline 3 states that public facilities and services in urban areas should be provided at levels necessary and suitable for urban uses.

Goal 11 guideline 4 states: "Public facilities and services in urbanizable areas should be provided at levels necessary and suitable for existing uses. The provision for future public facilities and services in these areas should be based upon: (1) the time required to provide the service; (2) reliability of service; (3) financial cost; and (4) levels of service needed and desired." (emphasis added)

Public facilities and services in urbanizable areas should be provided at levels necessary and suitable for existing uses. Existing uses in the UGB expansion areas are rural uses. Urban employment uses are not permitted outright by adoption of the 2030 Plan amendments. Instead, as described in the City's findings below and under Goal 14, these lands are designated and zoned with an interim "holding zone."

The 2030 Plan Urbanization Element includes policies requiring timely provision of urban services through the annexation process, consistent with applicable Metro Plan policies.

2030 Plan Urbanization Element Policy 30:

> ***"Unincorporated land within the Springfield UGB may be developed with permitted uses at maximum density only upon annexation to the City when it is found that key urban facilities and services can be provided to the area to be annexed in an orderly and efficient manner. Provision of these services to the area proposed for annexation***

is consistent with the timing and location for such extension, where applicable, in the City's infrastructure plans — such as the Public Facilities and Services Plan; the Springfield Transportation System Plan; the City's Capital Improvement Program; and the urbanization goals, policies and implementation strategies of this Element — or a logical time within which to deliver these services has been determined, based upon demonstrated need and budgetary priorities."

The PFSP describes the facilities and services needed in urban areas to provide service levels necessary and suitable for urban uses.

Eugene-Springfield Metropolitan Area Public Facilities and Services Plan. The Metro Plan Public Facilities and Services Element incorporates the findings and policies in the Eugene-Springfield Metropolitan Area Public Facilities and Services Plan (PFSP), adopted as a refinement to the Metro Plan. The PFSP is Springfield's acknowledged public facility plan. The PFSP provides guidance for public facilities and services, including planned water, wastewater, stormwater, and electrical facilities. As required by Goal 11, the PFSP identifies and shows the general location of the water, wastewater, and stormwater projects needed to serve land within the UGB. The PFSP also contains this information for electrical facilities, although not required to by law. (p. III-G-1, 2) The PFSP addresses facilities and services needed to serve the land uses designated in the comprehensive plan, including all urban land designated urban development within the Springfield UGB. The PFSP helps assure that urban development within Springfield's urban growth boundary is guided and supported by types and levels of urban facilities and services appropriate for the needs and requirements of the urban areas to be serviced, and that those facilities and services are provided in a timely, orderly and efficient arrangement, as required by Goal 11.

Springfield has a PFSP as required under ORS 197.712(2)(e).

Before the newly urbanizable land added to the Springfield UGB can transition from urbanizable to urban (e.g. annexation to the City of Springfield to allow urban development), transportation and public facilities must be planned and provided to serve the areas added to the UGB.

2030 Plan Urbanization Element Policy 29 states:

"Annexation shall continue to be a prerequisite for urban development and the delivery of City services in accordance with the Springfield Comprehensive Plan and Springfield Development Code."

2030 Plan Urbanization Element Policy 30 states:

"Unincorporated land within the Springfield UGB may be developed with permitted uses at maximum density only upon annexation to the City when it is found that key urban facilities and services can be provided to the area to be annexed in an orderly and efficient manner. Provision of these services to the area proposed for annexation

is consistent with the timing and location for such extension, where applicable, in the City's infrastructure plans — such as the Public Facilities and Services Plan; the Springfield Transportation System Plan; the City's Capital Improvement Program; and the urbanization goals, policies and implementation strategies of this Element — or a logical time within which to deliver these services has been determined, based upon demonstrated need and budgetary priorities."

2030 Plan requires timely amendment of PFSP. 2030 Plan Urbanization Element Policy 37 requires the PFSP to be updated prior to approval of a PAPA or zoning amendment that permits urban development above the level currently permitted in the existing Lane County zoning:

"Prior to re-designating and rezoning land designated Urban Holding Area-Employment, the City shall update and adopt amendments to the Eugene-Springfield Metropolitan Public Facilities and Services Plan (PFSP) that may be needed to identify new facilities or major modification of facilities needed to serve development of urban employment uses within the North Gateway or Mill Race districts as necessary to demonstrate consistency with statewide planning Goal 11 and Goal 11 administrative rules requirements and the policies of Metro Plan Chapter III-G Public Facilities Element of the Metro Plan."

Goal 11 guideline 5 states "A public facility or service should not be provided in an *urbanizable* area unless there is provision for coordinated development of all the other urban facilities and services appropriate to that area."

Public facilities and services in Springfield's *urban* areas will be provided at levels necessary and suitable for urban uses only after annexation to the City and shall be coordinated with development of all the other urban facilities and services appropriate to that area. [2030 Urbanization Element Policies 29, 30 and 31]

2030 Plan Urbanization Element Policy 27 states:

"The coordinated, timely provision of urban services is a central element of the City's comprehensive growth management strategy for infill, redevelopment and new development. Development undertaken in pursuit of housing goals, diversifying the economy and neighborhood livability shall occur only after the logical and efficient delivery of all urban services have been provided to these sites.

- ***Prepare and adopt comprehensive plan and zoning updates at the neighborhood, district, and corridor scale to determine the density, character and design of urban development in alignment with infrastructure capacity to ensure efficient and economical delivery of urban services in balance with the City's financial resources."***

2030 Plan Urbanization Element Policy 28 states:

> ***"Regionally significant public investments within Springfield's UGB shall be planned on a metropolitan-wide basis, as described in the regional transportation and public facilities plans."***

The 2030 Plan Urbanization Element (Ordinance Exhibit C-1, page 15-17 sets forth required planning procedures to ensure timely coordination of facilities planning for the UHA-E designated lands added to the UGB:

"PLAN AMENDMENT PROCEDURES AND REQUIREMENTS TO DESIGNATE UHA-E URBANIZABLE LAND FOR URBAN DEVELOPMENT BEFORE ANNEXATION AND DEVELOPMENT APPROVAL
Lands designated UHA-E require comprehensive plan amendments and may require facility plan amendments prior to their designation and zoning for urban employment use. The policies and implementation strategies in this Urbanization Element describe Statewide Planning Goal requirements that must be addressed prior to approval of plan and zoning changes that allow the transition from urbanizable to urban on lands designated UHA-E. Specific policies and implementation strategies are listed under each Urbanization Planning Goal to identify the steps needed before land may be designated, zoned and annexed to permit development to occur. These steps ensure that ample opportunities for citizen involvement are provided through community refinement planning processes conducted at the district scale to establish employment land use designations, zoning, design and development standards, transportation systems and public facilities to meet and balance community and industry needs in the North Gateway and Mill Race UHA-E Districts."
and:
"***Planning Requirements in Urban Holding Areas***

District, refinement plan or master plan approval is required prior to or concurrent with annexation of land designated Urban Holding Area- Employment as shown in Table 3. Urban Holding Areas are zoned Agriculture - Urban Holding Area (AG) prior to plan amendment approval and prior to annexation."

Table 5: Pre-Development Approval Process Steps – Urban Holding Areas

City-initiated Planning Process	Owner-initiated Planning Process
1. City prepares Plan Amendment to address all applicable Statewide Planning Goals (e.g. amended or new refinement plan or district plan), Metro Plan and 2030 Comprehensive Plan policies and Springfield Development Code standards.	1. Applicant submits request to City to initiate amendments to Transportation System Plan and Public Facilities and Services Plan, and other city actions that may be required prior to plan amendment approval.
2. City and Lane County approve Plan Amendment to amend Metro Plan and	2. Applicant prepares and submits Plan Amendment application to address all

Springfield 2030 Comprehensive Plan. UHA-E designation is replaced with employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, Industrial). AG zoning remains in effect until Master Plan and new zoning are approved.	applicable Statewide Planning Goals, Metro Plan and 2030 Comprehensive Plan policies, and Springfield Development Code standards. Applicant proposes employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, Industrial).
3. City prepares and approves Zoning Map Amendment to apply new zoning districts (e.g. Industrial, Campus Industrial, Employment Mixed Use, Employment). Land is planned and zoned and eligible for annexation.	3. City and Lane County approve Plan Amendment to amend Metro Plan and Springfield 2030 Comprehensive Plan. UHA-E designation is replaced with employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, Industrial). AG zoning remains in effect until Master Plan and new zoning are approved.
4. Applicant prepares and submits Master Plan and annexation applications with demonstration of key urban service provision.	4. Applicant prepares and submits Master Plan with proposed zoning and demonstration of key urban services provision. Applicant submits annexation application.
5. City approves City approves Master Plan and annexation.	5. City approves Master Plan and Zoning Map Amendment and annexation.
6. Applicant submits Site Plan, Subdivision etc. Type II development applications.	6. Applicant submits Site Plan, Subdivision etc. Type II development applications.

The requirements above are also provided in the City's AG Zoning District land use regulations (Ordinance Exhibit E), as explained in the City's findings under Goals 9 and 14.

OAR 660-024-0060(8)

"The Goal 14 boundary location determination requires evaluation and comparison of the relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services needed to urbanize alternative boundary locations…

The evaluation and comparison must include:

(a) The impacts to existing water, sanitary sewer, storm water and transportation facilities that serve nearby areas already inside the UGB;

(b) The capacity of existing public facilities and services to serve areas already inside the UGB as well as areas proposed for addition to the UGB; and

(c) The need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements on existing roadways and, for urban areas of 25,000 or more, the provision of public transit service."

Goal 11 is applicable to the 2030 plan amendments as it relates to the City's Goal 14 Boundary Alternatives Analysis process to evaluate and compare potential UGB expansion areas.

As part of Springfield's 2030 Plan CIBL/EOA planning process, ECO Northwest and the City conducted analysis to identify public facilities and services needed to serve target employers, forecast employment growth industries, site types and site needs. The CIBL/EOA planning process identified infrastructure and service capacity constraints and development constraints as they affect the suitability and serviceability of lands in the CIBL inventory to meet identified employment site needs. ECONorthwest and the City examined industry service needs to evaluate the capacity of existing and planned public facilities and services (water, sanitary sewer, stormwater and transportation facilities) to serve areas already inside the UGB as well as areas proposed for addition to the UGB.

As part of Springfield's UGB Alternatives Analysis process, the City conducted a series of comparative analyses to determine the degree of difficulty of serving alternative locations for UGB expansion, to identify the facilities and services that potentially will be needed and to estimate cost of developing and providing infrastructure and services. The City's comparative estimated costs are high level approximate "rough cost estimates" expressed in current-year dollars, developed to aid in achieving the requirements of Goal 11, Public Facilities and Services, OAR 660-015-0000(11). Project cost estimates are not intended to be as exact as is required for budgeting purposes.

<u>Goal 14 comparative analyses of serving alternative UGB expansion locations.</u> As part of the City's evaluation of candidate lands to include in the UGB expansion, staff conducted outreach with agency staff and service providers to conduct comparative analyses of alternative UGB expansion locations to:

- Identify public facilities and services that may be required to serve candidate areas;
- Estimate costs to provide services public facilities and services that may be required to serve candidate areas;
- Identify candidate areas or portions thereof that could be served by facilities that are already planned to serve lands within the existing UGB.
- Compare 20-year land needs for transportation and public facilities that may be required to serve the UGB expansion areas as they ultimately develop with urban uses. For this high level analysis, the City assumed Campus Industrial–type employment uses and densities would be planned for the expansion areas.

The City evaluated and compared of the relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services needed to urbanize

alternative boundary locations:[25] The City's analysis identified the facilities and services that potentially will be needed — based on service levels for industrial and commercial uses consistent with plan policies.

Public land component. The inclusion of the public land component in the UGB expansion provides advantages compared with alternative UGB expansion areas with respect to the provision of clean drinking water, public parks and recreation facilities, and open space because these lands are already owned by the public. The public lands are located to include existing drinking water source areas (intake, filtration and conveyance), existing and planned parks, and existing and planned park facilities. The existing and planned multi-use path system provides important linkages within Springfield's transportation system for alternatives to the automobile.

ORS 197.712(2)(c)

> "By the adoption of new goals or rules, or the application, interpretation or amendment of existing goals or rules, the Land Conservation and Development Commission shall implement all of the following:
>
> (c) Comprehensive plans and land use regulations shall provide for at least an adequate supply of sites of suitable sizes, types, locations and service levels for industrial and commercial uses consistent with plan policies."(emphasis added)

The 2030 Plan expands the UGB to "provide at least an adequate supply of sites of suitable sizes, types, locations and service levels for industrial and commercial uses consistent with plan policies." For the purposes of the City's public facilities and services analysis to compare and evaluate potentially suitable UGB expansion areas under Goal 14, the City evaluated needed urban services levels for industrial and commercial uses consistent with plan policies in the Metro Plan Public Facilities and Services Element, PFSP, and 2030 Plan Urbanization Element.

OAR 660-011-0025 Timing of Required Facilities

> *"(1) The public facilities plan shall include a general estimate of the timing for the planned public facility projects. This timing component of the public facilities plan can be met in several ways depending on whether the project is anticipated in the short term or long term. The timing of projects may be related directly to population growth, e.g., the expansion or new construction of water treatment facilities. Other facility projects can be related to a measure of the facility's service level being met or exceeded, e.g., a major arterial or intersection reaching a maximum vehicle-per-day standard. Development of other projects may be more long term and tied neither to specific population levels nor measures of service levels, e.g., sewer projects to correct infiltration and inflow*

[25] The City's findings under Goal 14: "Public Facilities Analysis" provide summaries of public facilities for UGB study area lands organized by priority categories pursuant to ORS 197.298, and specific references to the facilities plans used as the factual base to inform the analysis.

problems. These projects can take place over a long period of time and may be tied to the availability of long-term funding. The timing of projects may also be tied to specific years.

(2) Given the different methods used to estimate the timing of public facilities, the public facility plan shall identify projects as occurring in either the short term or long term, based on those factors which are related to project development. For those projects designated for development in the short term, the public facility plan shall identify an approximate year for development. For those projects designated for development over the long term, the public facility plan shall provide a general estimate as to when the need for project development would exist, e.g., population level, service level standards, etc. Timing provisions for public facility projects shall be consistent with the acknowledged comprehensive plan's projected growth estimates. The public facility plan shall consider the relationships between facilities in providing for development.

(3) Anticipated timing provisions for public facilities are not considered land use decisions as specified in ORS 197.712(2)(e), and, therefore, cannot be the basis of appeal under ORS 197.610(1) and (2) or 197.835(4)."

2030 Plan Urbanization Element Policy 37 requires the PFSP to be updated prior to approval of a PAPA or zoning amendment that permits urban development above the level currently permitted in the existing Lane County zoning:

"Prior to re-designating and rezoning land designated Urban Holding Area-Employment, the City shall update and adopt amendments to the Eugene-Springfield Metropolitan Public Facilities and Services Plan (PFSP) that may be needed to identify new facilities or major modification of facilities needed to serve development of urban employment uses within the North Gateway or Mill Race districts as necessary to demonstrate consistency with statewide planning Goal 11 and Goal 11 administrative rules requirements and the policies of Metro Plan Chapter III-G Public Facilities Element of the Metro Plan."

To evaluate and compare the ESEE consequences of expanding the UGB in different locations under ORS 197.298 and Goal 14, City Engineering and Finance staff:

- Identified projects that would likely be needed to serve the area
- Prepared rough cost estimates of projects
- Identified potential funding mechanisms

Timing of needed projects shall be identified when the PFSP is updated.

OAR 660-011-0030 Location of Required Facilities

"(1) The public facility plan shall identify the general location of the public facility project in specificity appropriate for the facility. Locations of projects anticipated to be carried out in the short term can be specified more precisely than the locations of projects anticipated for development in the long term.

(2) Anticipated locations for public facilities may require modifications based on subsequent environmental impact studies, design studies, facility master plans, capital improvement programs, or land availability. The public facility plan should anticipate those changes as specified in OAR 660-011-0045."

The existing PFSP and local facilities plans identify general location of needed public facility projects to serve lands designated for urban employment and other uses within the existing UGB.

The City's UGB Boundary Alternatives Analysis findings[26] (Public Facilities and Services Analysis) identify anticipated locations for public facilities needed to serve uses within the existing UGB and the UGB expansion areas.

OAR 660-011-0035 Determination of Rough Cost Estimates for Public Facility Projects and Local Review of Funding Mechanisms for Public Facility Systems

"(1) The public facility plan shall include rough cost estimates for those sewer, water, and transportation public facility projects identified in the facility plan. The intent of these rough cost estimates is to:

(a) Provide an estimate of the fiscal requirements to support the land use designations in the acknowledged comprehensive plan; and

(b) For use by the facility provider in reviewing the provider's existing funding mechanisms (e.g., general funds, general obligation and revenue bonds, local improvement district, system development charges, etc.) and possible alternative funding mechanisms. In addition to including rough cost estimates for each project, the facility plan shall include a discussion of the provider's existing funding mechanisms and the ability of these and possible new mechanisms to fund the development of each public facility project or system. These funding mechanisms may also be described in terms of general guidelines or local policies.

(2) Anticipated financing provisions are not considered land use decisions as specified in ORS 197.712(2)(e) and, therefore, cannot be the basis of appeal under ORS 197.610(1) and (2) or 197.835(4)."

[26] The referenced City's findings are located in this report under Goal 14 subheader OAR 660-024-0060.

The existing PFSP and local facilities plans comply with OAR 660-011-0035. The City's UGB Boundary Alternatives Analysis planning process provided planning level rough cost estimates. Estimated project costs and comparisons are provided in the City's findings under Goal 14.

OAR Division 11 Conclusion: Springfield's existing comprehensive plan, PFSP and 2030 Plan Urbanization Element policies comply with the applicable rules of Division 11.

Consistency with Metro Plan Public Facilities and Services Element. The 2030 Plan amendments do not include amendments to the Metro Plan Public Facilities and Services Element or concurrent amendments to the PFSP. The following findings and policies from the existing acknowledged Metro Plan Public Facilities and Services Element are applicable to Springfield land use decisions. Thus, the findings and policies are related to the 2030 Plan amendments, are provided in this report to demonstrate compliance with Goal 11 and Division 11 Public Facilities Planning, and to provide context for the 2030 Plan amendments. Excerpts from existing plan text are shown in italicized font.

"The availability of public facilities and services is a key factor influencing the location and density of future development. The public's investment in, and scheduling of, public facilities and services are a major means of implementing the Metro Plan. As the population of the Eugene-Springfield area increases and land development patterns change over time, the demand for urban services also increases and changes. These changes require that service providers, both public and private, plan for the provision of services in a coordinated manner, using consistent assumptions and projections for population and land use."

Goals

1. *Provide and maintain public facilities and services in an efficient and environmentally responsible manner.*

2. *Provide public facilities and services in a manner that encourages orderly and sequential growth.*

Findings and Policies

- *Urban expansion within the UGB is accomplished through in-fill, redevelopment, and annexation of territory which can be served with a minimum level of key urban services and facilities. This permits new development to use existing facilities and services, or those which can be easily extended, minimizing the public cost of extending urban facilities and services.*

- *In accordance with Statewide Planning Goal 11 and OAR 660, the Public Facilities and Services Plan identifies jurisdictional responsibility for the provision of water, wastewater and stormwater, describes respective service areas and existing and planned water, wastewater, and stormwater facilities, and contains planned facilities maps for these services. Electric system information and improvements are included in the Public Facilities and Services Plan, although*

not required by state law. Local facility master plans and refinement plans provide more specific project information.

- *The Public Facilities and Services Plan finds that almost all areas within the city limits of Eugene and Springfield are served or can be served in the short-term (0-5 years) with water, wastewater, stormwater, and electric service. Exceptions to this are stormwater service to portions of the Willow Creek area and southeast Springfield, and full water service at some higher elevations in Eugene's south hills. Service to these areas will be available in the long term. Service to all areas within city limits are either in a capital improvement plan or can be extended with development.*

- *With the improvements specified in the Public Facilities and Services Plan project lists, all urbanizable areas within the UGB can be served with water, wastewater, stormwater, and electric service at the time those areas are developed. In general, areas outside city limits serviceable in the long term are located near the urban growth boundary and in urban reserves, primarily in River Road/Santa Clara, west Eugene's Willow Creek area, south Springfield, and the Thurston and Jasper-Natron areas in east Springfield.*

- *As discussed in the Public Facilities and Services Plan, a majority of Nodal Development Areas proposed in TransPlan are serviceable now or in the short term. The City of Eugene's adopted Growth Management Policy #15 states, "Target publicly-financed infrastructure extensions to support development for higher densities, in-fill, mixed uses, and nodal development."*

- *Springfield relies on groundwater for its sole source of water. Eugene Water & Electric Board's (EWEB) water source is the McKenzie River and EWEB is developing groundwater sources. The identification of projects on the Public Facilities and Services Plan planned facilities map does not confer rights to a groundwater source.*

- *Administration and enforcement of the Clean Water Act stormwater provisions occur at the state level, through National Pollutant Discharge Elimination System (NPDES) permitting requirements. Applicable jurisdictions are required to obtain an NPDES stormwater permit from the Oregon Department of Environmental Quality (DEQ), and prepare a water quality plan outlining the Best Management Practices (BMPs) to be taken over a five-year permit period for reducing stormwater pollutants to "the maximum extent practicable."*

- *The Clean Water Act requires states to assess the quality of their surface waters every three years, and to list those waters that do not meet adopted water quality standards. The Willamette River and other water bodies have been listed as not meeting the standards for temperature and bacteria. This will require the development of Total Maximum Daily Loads (TMDLs) for these pollutants, and an allocation to point and non-point sources.*

- *The listing of Spring Chinook Salmon as a threatened species in the Upper Willamette River requires the application of Endangered Species Act (ESA) provisions to the salmon's habitat in the McKenzie and Willamette Rivers. The decline in the Chinook Salmon has been attributed to such factors as destruction of habitat through channelization and revetment of river banks, non-point source pollution, alterations of natural hydrograph by increased impervious surfaces in the basin, and degradation of natural functions of riparian lands due to removal or alteration of indigenous vegetation.*

- *There are many advantages to keeping channels open, including, at a minimum, natural biofiltration of stormwater pollutants; greater ability to attenuate effects of peak stormwater flows; retention of wetland, habitat, and open space functions; and reduced capital costs for stormwater facilities.*

- *An increase in impervious surfaces, without mitigation, results in higher peak flows during storm events, less opportunity for recharging of the aquifer, and a decrease in water quality.*

- *Stormwater systems tend to be gravity-based systems that follow the slope of the land rather than political boundaries. In many cases, the natural drainageways such as streams serve as an integral part of the stormwater conveyance system.*

- *In general, there are no programs for stormwater maintenance outside the Eugene and Springfield city limits, except for the Lane County Roads Program. State law limits county road funds for stormwater projects to those located within the public right-of-way.*

- *Filling in designated floodplain areas can increase flood elevations above the elevations predicted by Federal Emergency Management Agency (FEMA) models, because the FEMA models are typically based only on the extent of development at the time the modeling was conducted and do not take into account the ultimate buildout of the drainage area. This poses risks to other properties in or adjacent to floodplains and can change the hydrograph of the river.*

- *State Planning Goal 5 and OAR 660-023-0090 require state and local jurisdictions to identify and protect riparian corridors.*

Policies

- ***Policy G.1: Extend the minimum level and full range of key urban facilities and services in an orderly and efficient manner consistent with the growth management policies in Chapter II-B, relevant policies this chapter, and other Metro Plan policies.***

- ***Policy G.2: Use the planned facilities maps of the Public Facilities and Services Plan to guide the general location of water, wastewater, stormwater, and electrical projects in the***

metropolitan area. Use local facility master plans, refinement plans, capital improvement plans and ordinances as the guide for detailed planning and project implementation.

- ***Policy G.3: Modifications and additions to or deletions from the project lists in the Public Facilities and Services Plan for water, wastewater, and stormwater public facility projects or significant changes to project location, from that described in the Public Facilities and Services Plan maps 1, 2 and 3, require amending the Public Facilities and Services Plan and the Metro Plan, except for the following:***

  1) Modifications to a public facility project which are minor in nature and do not significantly impact the project's general description, location, sizing, capacity or other general characteristic of the project; or

  2) Technical and environmental modifications to a public facility which are made pursuant to final engineering on a project; or

  3) Modifications to a public facility project which are made pursuant to findings of an Environmental Assessment or Environmental Impact Statement conducted under regulations implementing the procedural provisions of the National Environmental Policy Act of 1969 or any federal or State of Oregon agency project development regulations consistent with that act and its regulations.

- ***Policy G.4: The cities and Lane County shall coordinate with EWEB, SUB, and special service districts operating in the metropolitan area, to provide the opportunity to review and comment on proposed public facilities, plans, programs, and public improvement projects or changes thereto that may affect one another's area of responsibility.***

- ***Policy G.7: Service providers shall coordinate the provision of facilities and services to areas targeted by the cities for higher densities, infill, mixed uses, and nodal development.***

- ***Policy G.10: Continue to take positive steps to protect groundwater supplies. The cities, county, and other service providers shall manage land use and public facilities for groundwater-related benefits through the implementation of the Springfield Drinking Water Protection Plan and other wellhead protection plans. Management practices instituted to protect groundwater shall be coordinated among the City of Springfield, City of Eugene, and Lane County.***

- ***Policy G.11: Ensure that water main extensions within the urban growth boundary include adequate consideration of fire flows.***

- **Policy G.13: Improve surface and ground water quality and quantity in the metropolitan area by developing regulations or instituting programs for stormwater to:**

a. **Increase public awareness of techniques and practices private individuals can employ to help correct water quality and quantity problems;**

b. **Improve management of industrial and commercial operations to reduce negative water quality and quantity impacts;**

c. **Regulate site planning for new development and construction to better manage pre- and post-construction storm runoff, including erosion, velocity, pollutant loading, and drainage;**

d. **Increase storage and retention and natural filtration of storm runoff to lower and delay peak storm flows to settle out pollutants prior to discharge into waterways;**

e. **Require on-site controls and development standards, as practical, to reduce off-site impacts from stormwater runoff;**

f. **Use natural and simple mechanical treatment systems to provide treatment for potentially contaminated runoff waters;**

g. **Reduce street-related water quality and quantity problems;**

h. **Regulate use and require containment and/or pretreatment of toxic substances;**

i. **Include containment measures in site review standards to minimize the effects of chemical and petroleum spills; and**

j. **Consider impacts to ground water quality in the design and location of dry wells.**

- ***Policy G.14: Implement changes to stormwater facilities and management practices to reduce the presence of pollutants regulated under the Clean Water Act and to address the requirements of the Endangered Species Act.***

- ***Policy G.15: Consider wellhead protection areas and surface water supplies when planning stormwater facilities.***

- ***Policy G.16: Manage or enhance waterways and open stormwater systems to reduce water quality impacts from runoff and to improve stormwater conveyance.***

- ***Policy G.17: Include measures in local land development regulations that minimize the amount of impervious surface in new development in a manner that reduces stormwater pollution, reduces the negative effects from increases in runoff, and is compatible with Metro Plan policies.***

- ***Policy G.18: The cities and Lane County shall adopt a strategy for the unincorporated area of the urban growth boundary to: reduce the negative effects of filling in floodplains and prevent the filling of natural drainage channels except as necessary to ensure public operations and maintenance of these channels in a manner than preserves and /or enhances floodwater conveyance capacity and biological function.***

- ***Policy G.19: Maintain flood storage capacity within the floodplain, to the maximum extent practical, through measures that may include reducing impervious surface in the floodplain and adjacent areas.***

- ***Policy G.26: Plan for the following levels of service for rural designations outside the urban growth boundary within the Metro Plan Boundary:***
  a. <u>Agriculture, Forest Land, Sand and Gravel, and Parks and Open Space</u>. No minimum level of service is established.

  b. <u>Rural Residential, Rural Commercial, Rural Industrial, and Government and Education</u>. On-site sewage disposal, individual water systems, rural level of fire and police protection, electric and communication service, schools, and reasonable access to solid waste disposal facility.

- ***Policy G.27: Consistent with local regulations, locate new urban water, wastewater, and stormwater facilities on farm land and urban water and wastewater facilities on forest land outside the urban growth boundary only when the facilities exclusively serve land inside the urban growth boundary and there is no reasonable alternative.***

- ***Policy G.29: Facility providers shall coordinate with Lane County and other local jurisdictions and obtain the necessary county land use approvals to amend the Lane County Rural Comprehensive Plan, or the Metro Plan, as needed and consistent with state law, to appropriately designate land for urban facilities located outside the urban growth boundary or the Plan boundary.***

- ***Policy G.30: The cities shall coordinate with Lane County on responsibility and authority to address stormwater-related issues outside the Plan boundary, including outfalls outside the Springfield portion of the urban growth boundary.***

The City's findings under Goal 14, (pages 218-239 of this report, and Tables 5, 11, and 17) identify the facilities plans the City to determine infrastructure and public facilities needs in the Boundary Alternatives Analysis.

<u>Goal 11 PFSP Conclusions:</u> The City conducted analysis to identify public facilities that are likely to be needed within the 2010-2030 planning period to serve the North Gateway and Mill Race UGB expansion areas.(Table 17)

The 2030 plan amendments designate urbanizable land in the UGB expansion areas as “Urban Holding Area - Employment (UHA-E), an urban transition plan designation. Lands designated UHA-E are zoned Agriculture, an urban transition zoning district. Urban land uses are not permitted until subsequent plan amendments and zone changes that demonstrate compliance with applicable planning goals including Goal 11 are adopted and acknowledged to allow transition from rural to urban. Public facilities and services needed to serve land designated for urban development in the UHA-E districts will be determined in coordination with subsequent refinement and master planning of the two new employment districts. The PFSP shall be amended as necessary after specific facility needs are determined. The 2030 Plan Urbanization Element and AG Zoning District land use regulations describe the required sequencing of post-acknowledgement plan amendments, including PFSP amendments.

The 2030 plan amendments meet the applicable requirements of Goal 11. As Springfield adopts subsequent plan amendments and zone changes that make adjustments to permitted uses or densities, the City will evaluate effects on capacity of public infrastructure, and where necessary, propose additional plan amendments in compliance with this goal.

OAR 660-011-0000 Definitions

(1) "Public Facilities Plan": A public facility plan is a support document or documents to a comprehensive plan. The facility plan describes the water, sewer and transportation facilities which are to support the land uses designated in the appropriate acknowledged comprehensive plans within an urban growth boundary containing a population greater than 2,500. Certain elements of the public facility plan also shall be adopted as part of the comprehensive plan, as specified in OAR 660-11-045.

(2) "Rough Cost Estimates": Rough cost estimates are approximate costs expressed in current-year (year closest to the period of public facility plan development) dollars. It is not intended that project cost estimates be as exact as is required for budgeting purposes.

(3) "Short Term": The short term is the period from year one through year five of the facility plan.

(4) "Long Term": The long term is the period from year six through the remainder of the planning period.

(5) "Public Facility": A public facility includes water, sewer, and transportation facilities, but does not include buildings, structures or equipment incidental to the direct operation of those facilities.

(6) "Public Facility Project": A public facility project is the construction or reconstruction of a water, sewer, or transportation facility within a public facility system that is funded or utilized by members of the general public.

(7) "Public Facility Systems": Public facility systems are those facilities of a particular type that combine to provide water, sewer or transportation services.

For purposes of this division, public facility systems are limited to the following:

(a) Water:

(A) Sources of water;

(B) Treatment system;

(C) Storage system;

(D) Pumping system;

(E) Primary distribution system.

(b) Sanitary sewer:

(A) Treatment facilities system;

(B) Primary collection system.

(c) Storm sewer:

(A) Major drainageways (major trunk lines, streams, ditches, pump stations and retention basins);

(B) Outfall locations.

(d) Transportation:

(A) Freeway system, if planned for in the acknowledged comprehensive plan;

(B) Arterial system;

(C) Significant collector system;

(D) Bridge system (those on the Federal Bridge Inventory);

(E) Mass transit facilities if planned for in the acknowledged comprehensive plan, including purchase of new buses if total fleet is less than 200 buses, rail lines or transit stations associated with providing transit service to major transportation corridors and park and ride station;

(F) Airport facilities as identified in the current airport master plans;

(G) Bicycle paths if planned for in the acknowledged comprehensive plan.

(8) "Land Use Decisions": In accordance with ORS 197.712(2)(e), project timing and financing provisions of public facility plans shall not be considered land use decisions as specified under ORS 197.015(10).

(9) "Urban Growth Management Agreement": In accordance with OAR 660-003-0010(2)(c), and urban growth management agreement is a written statement, agreement or set of agreements setting forth the means by which a plan for management of the unincorporated area within the urban growth boundary will be completed and by which the urban growth boundary may be modified (unless the same information is incorporated in other acknowledged documents).

(10) Other Definitions: For the purposes of this division, the definitions in ORS 197.015 shall apply except as provided for in section (8) of this rule regarding the definition in ORS 197.015(10).

Statewide Planning Goal 12: Transportation

OAR 660-015-0000(12)
To provide and encourage a safe, convenient and economic transportation system

Goal 12 lists nine requirements for transportation plans, including the requirement for Transportation plans to conform with local and regional comprehensive land use plans. This section of the City's findings explain how the subject 2030 Plan amendments to the comprehensive plan were coordinated with local and regional transportation planning to support and advance the planning objectives in Goal 12:

> *"Plans shall (1) consider all modes of transportation including mass transit, air, water, pipeline, rail, highway, bicycle and pedestrian; including mass transit, air, water, pipeline, rail, highway, bicycle and pedestrian; (2) be based upon an inventory of local, regional and state transportation needs; (3) consider the differences in social consequences that would result from utilizing differing combinations of transportation modes; (4) avoid principal reliance upon any one mode of transportation; (5) minimize adverse social, economic and environmental impacts and costs; (6) conserve energy; (7) meet the needs of the transportation disadvantaged by improving transportation services; (8) facilitate the flow of goods and services so as to strengthen the local and regional economy; and (9) conform with local and regional comprehensive land use plans."*

The City's findings under Goal 12 provide supporting rationale to explain how coordination with local and regional transportation planning strongly influenced the City's evaluation of policy alternatives under Goal 9 and 12, and its evaluation of Urban Growth Boundary Alternatives under Goal 14 and OAR 660-024-0060.

Goal 12 defines *Transportation* as *"the movement of people and goods."*

Goal 12 defines *Transportation Facility* as *"any physical facility that moves or assists in the movement of people and goods excluding electricity, sewage and water."*

Goal 12 defines *Transportation System* as *"one or more transportation facilities that are planned, developed, operated and maintained in a coordinated manner to supply continuity of movement between modes, and within and between geographic and jurisdictional areas."*

Goal 12 defines *Mass Transit* as *"any form of passenger transportation which carries members of the public on a regular and continuing basis."*

Goal 12 defines *Transportation Disadvantaged* as "those individuals who have difficulty in obtaining transportation because of their age, income, physical or mental disability."

Springfield's acknowledged transportation plans are the regional transportation system plan (RTSP) *TransPlan,* which guides development through 2021, and Springfield's local 2035 Transportation System Plan (TSP), effective 2015-2035.[27] The plans were acknowledged to affirm conformance with local and regional comprehensive land use plans in compliance with Goal 12. The acknowledged regional and local transportation system plans are in effect over the 2010-2030 planning period of the subject 2030 Plan amendments to the comprehensive plan. In 2016, the RTSP is in the process of being updated.[28]

Springfield and Eugene, having separate UGBs, are in the process of developing local comprehensive land use plans that will eventually supplant the Metro Plan comprehensive land use plan. Updates to the regional transportation plan will conform to Eugene and Springfield's local comprehensive land use plans, as required by Goal 12. Updates to the TSP will conform to Springfield's local comprehensive land use plan.

The City's subject 2030 Plan amendments as they address land uses within the existing UGB have been planned in coordination with Springfield's acknowledged TSP and *TransPlan.*

The City's subject 2030 Plan amendments as they address lands added to the UGB have been planned in coordination with the applicable transportation policies in Springfield's acknowledged TSP, Metro Plan Transportation Element Land Use policies.

Springfield 2030 Economic and Urbanization Element policies guide land use development over the 2010-2030 planning period consistent with the transportation policies in Springfield's acknowledged TSP, and Metro Plan Transportation Element Land Use policies.

<u>Transportation planning required prior to future development in UGB expansion areas.</u> Transportation planning will be coordinated with future urbanization of lands added to the UGB by the City's subject 2030 Plan amendments through future amendments to the TSP and RTSP. The City and Lane County adopted 2030 Plan Urbanization Element policies and land use regulations requiring a post-acknowledgement plan amendment process — including necessary updates to the TSP — prior to issuance of land use development approval that increases trips above existing rural levels of use. By adopting Ordinance Exhibits A-2, A-3 and E, the City and Lane County designated the newly urbanizable employment lands added to the UGB as "Urban Holding Area – Employment" and zoned the lands "Agriculture –Urban Holding Area."

[27] The Springfield TSP and adopted findings are included in the record.

[28] Central Lane MPO Unified Planning Work Program FY2016-2017 Interim Review and Update, Addendum to the UPWP, May 2016, Item 4 Regional Transportation System Plan. The MPO is scheduled to resume work of the RTSP after the Eugene TSP is completed. See also Item 6. Transportation Planning Performance Measures and Revised Estimated Timeline.

Springfield 2030 Economic and Urbanization Element policies guide development of employment land uses over the 2010-2030 planning period consistent with the transportation policies in Springfield's acknowledged TSP and in coordination with regional transportation plans as they are updated.

The required PAPA process to update the TSP will address OAR 660-009-0000(1)(i): *"Ensure that changes to comprehensive plans are supported by adequate planned transportation facilities."*

OAR 660-012-0000(1) Oregon Administrative Rules Division 12 implements Statewide Planning Goal 12 (Transportation) "to provide and encourage a safe, convenient and economic transportation system" and "implements provisions of other statewide planning goals related to transportation planning in order to plan and develop transportation facilities and services in close coordination with urban and rural development." The Stated purpose of Division 12 Transportation Planning is:

> *"to direct transportation planning in coordination with land use planning to:*
>
> *(a) Promote the development of transportation systems adequate to serve statewide, regional and local transportation needs and the mobility needs of the transportation disadvantaged;*
>
> *(b) Encourage and support the availability of a variety of transportation choices for moving people that balance vehicular use with other transportation modes, including walking, bicycling and transit in order to avoid principal reliance upon any one mode of transportation;*
>
> *(c) Provide for safe and convenient vehicular, transit, pedestrian, and bicycle access and circulation;*
>
> *(d) Facilitate the safe, efficient and economic flow of freight and other goods and services within regions and throughout the state through a variety of modes including road, air, rail and marine transportation;*
>
> *(e) Protect existing and planned transportation facilities, corridors and sites for their identified functions;*
>
> *(f) Provide for the construction and implementation of transportation facilities, improvements and services necessary to support acknowledged comprehensive plans;*
>
> *(g) Identify how transportation facilities are provided on rural lands consistent with the goals;*
>
> *(h) Ensure coordination among affected local governments and transportation service providers and consistency between state, regional and local transportation plans; and*
>
> *(i) Ensure that changes to comprehensive plans are supported by adequate planned transportation facilities."*

Because Springfield's population is greater than 2,500, Goal 12 administrative rules required the City to prepare and adopt a TSP. Prior to 2014, Springfield met this requirement through the local and regionally adopted TransPlan.

TransPlan (last amended in 2002) conforms with the land use designations and land use patterns established in Springfield's acknowledged local and regional comprehensive land use plans — the Metro Plan and Springfield's acknowledged refinement plans.

Prior to 2014, the 2002 TransPlan served as both the adopted local TSPs for Eugene and Springfield and as the Regional Transportation System Plan (RTSP) for the Central Lane MPO area.

In 2014 the Springfield 2035 TSP was adopted to supersede TransPlan as the City's specific refinement of the Eugene-Springfield Comprehensive General Plan (Metro Plan) insofar as it affects transportation systems within the Springfield UGB.

In 2016, the city of Eugene is preparing the Eugene TSP.

TransPlan will remain as the Regional Transportation System Plan (RTSP) for Eugene and Springfield until a new RTSP is adopted by the appropriate MPO jurisdictions. An updated RTSP is being developed through a regional process as outlined in a work plan agreed to with the Land Conservation and Development Commission.[29]

As stated in the City's TSP findings[30]:

> *"… the needs, projects, and policies identified in the Springfield TSP are consistent with TransPlan population and employment projections and therefore the TSP is consistent with TransPlan. Thus, TransPlan can serve as the benchmark for meeting this criterion until such a time that the ongoing regional process is complete. Until the new RTSP is adopted, Springfield is still held to the adopted performance standards in TransPlan (acting as the RTSP) and nothing in the 2035 Springfield TSP will inhibit or discourage continued achievement of the 2002 TransPlan performance objectives."*

The City of Springfield 2035 Transportation System Plan (TSP) was adopted and acknowledged in 2014[31] to replace the TransPlan as Springfield's local TSP after a thorough TSP planning process involving the general public, stakeholders, other agency staff and local and regional appointed and elected officials. The TSP conforms with the land use designations and land use patterns established in Springfield's local and regional comprehensive land use plans — the Metro Plan (including the acknowledged Springfield 2030 Residential Land Use and Housing Element[32] and Springfield's acknowledged refinement plans).

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[29] Central Lane MPO Unified Planning Work Program (WPWP) Addendum to the UPWP May 2016, p. 8 revised timeline, Action Item 4.
[30] Springfield File No. TYP413-00009, Staff Report Attachment 1, p. 19.
[31] Springfield Ordinance No. 6314, Springfield File No. TYP413-00009, Staff Report Exhibit A 2/24/14.
[32] Springfield Ordinance No. 6268 establishing a separate City of Springfield UGB pursuant to House Bill 3337 (2006) as codified in Oregon Revised Statute 197.304.

The Springfield TSP is a comprehensive 20-year plan to guide transportation investments within the City of Springfield UGB — replacing TransPlan as the local TSP for the City of Springfield. The TSP was adopted by Springfield and Lane County as a post acknowledgement plan amendment of the Metro Plan — as a supporting facility refinement plan providing more detailed policy guidance for specific transportation facilities, as required under Goal 12.

Springfield's acknowledged TSP provides a 20-year blueprint for how the City should maintain and improve the transportation network to meet growth demands within the existing Springfield UGB. The TSP addressed OAR 660-009-0000(1) (a) – (h).

The Springfield TSP identifies the preferred future multi-modal transportation system and the City's policies related to the transportation system. It also identifies the function, capacity, and location of future facilities, and identifies planning-level costs for needed improvements to support expected development and growth and possible sources of system funding. The TSP goals and policies implement the Goal 12: Transportation Element of the Metro Plan.[33] It is important to note that transportation modelling for the acknowledged TSP was developed in coordination with Springfield's 2030 comprehensive planning as follows:

> *"The transportation model used in the Springfield TSP differs from the TRANSPLAN model used in TransPlan. The TSP used the Springfield 2035 BUILD 1 (full build) model, <u>which incorporates the Springfield 2030 land use plan</u>. The coordinated population for Springfield created by PSU/PRC was used to derive population and housing growth for the model study area. The employment forecast was made by LCOG based on historical trends.* [34] (emphasis added)
>
> *"Comparisons are made below with TRANSPLAN, the regional TSP for the Eugene/Springfield area. There are significant differences between TRANSPLAN and the SPRINGFIELD travel model:*

a) TRANSPLAN geography is that of the METROPLAN; it does not include the City of Coburg. The SPRINGFIELD 2035 geography is that of the current MPO which includes Coburg and some additional Lane County land surrounding the UGBs.
b) TRANSPLAN model used 295 transportation analysis zones; the 2035 SPRINGFIELD model uses 666 transportation analysis zones. Thus, the latter has more refinement in the analysis units.
c) TRANSPLAN model did not have special treatment for BRT system operations; the 2035 SPRINGFIELD model does.
d) TRANSPLAN land use included the TRANSPLAN nodes. The 2035 SPRINGFIELD model has no specific nodes specified.
e) TRANSPLAN used the TPR vehicle trip rate reduction of10% allowed by the TPR. The 2035 SPRINGFIELD model did not. (VTR=vehicle trip reduction). Under this reduction trips

[33] Springfield 2035 Transportation System Plan (TYP413-00009) Staff Report, p. 2.
[34] Springfield 2035 Transportation System Plan (TYP413-00009) Staff Report Attachment A: Statistics from the Springfield 2035 BUILD 1 travel demand model.

from areas designated as mixed-use, pedestrian friendly areas are removed and transferred to other modes."[35]

As stated in the adopted TSP findings, Springfield Ordinance 6314 Exhibit A, the previously adopted and acknowledged Springfield TSP demonstrated that the TSP is consistent with the 2002 TransPlan.

As previously noted in the City's TSP findings:

> *"the 2002 TransPlan will still serve as the Regional Transportation System Plan (RTSP) for Eugene and Springfield until the new RTSP is adopted. An updated RTSP is being worked on through a regional process as outlined in a work plan agreed to with the Land Conservation and Development Commission. This regional process will enable the full effect of Springfield's policies and priorities, the City of Eugene's Envision Eugene strategies and multimodal projects and LTD's final transit network to be appropriately represented within the LCOG travel demand model. At that time, both cities and the region can establish and evaluate key performance statistics to replace and/or supplement those included in TransPlan that allow the cities and the region to monitor over time progress toward this TPR criteria. Further, as noted previously although the horizon years for Springfield's TSP and the RTP are different than that of TransPlan, the total population and employment estimates, upon which the recommended multimodal projects and policies in the TSP are based, are consistent. Detailed information received from LCOG provides the following information:*

- *The 2002 TransPlan modeled year 2020 total Population estimates for the Metro Area as 325,400; year 2025 total population was forecast as 351,263. The Springfield TSP is based on a total population for the Metro Area of 316,452 people, less than that of TransPlan.*
- *The 2002 TransPlan modeled year 2020 covered employment of 164,100 jobs; year 2025 forecasts reflect 176,004 jobs. The Springfield TSP accounts for only 164,110 in the region.*

> *Based on these population and employment forecast comparisons, <u>it can be concluded that the travel demand forecasts associated with the needs, projects, and policies identified in the 2035 Springfield TSP are less than the 2025 TransPlan travel demand forecasts. As a result, from an operational forecast standpoint, the 2035 Springfield TSP is consistent with TransPlan and can serve as the benchmark for meeting this criterion until such a time that the ongoing regional process is complete."*</u> (emphasis added)

<u>Conclusion 660-009-0000(1):</u> The acknowledged Springfield TSP, including the travel demand model, and the 2030 Plan amendments were coordinated to advance the objectives of OAR 660-009-0000(1).

[35] Ibid.

OAR 660-012-0000(2)

The stated purpose (2) of Division 12:

> *"In meeting the purposes described in section (1), coordinated land use and transportation plans should ensure that the planned transportation system supports a pattern of travel and land use in urban areas that will avoid the air pollution, traffic and livability problems faced by other large urban areas of the country through measures designed to increase transportation choices and make more efficient use of the existing transportation system."* (emphasis added)

OAR 660-012-0000(3)

The stated purpose (3) of Division 12 addresses coordination of land use and transportation planning:

> *"Coordinating land use and transportation planning will also complement efforts to meet other state and local objectives, including containing urban development, reducing the cost of public services, protecting farm and forest land, reducing air, water and noise pollution, conserving energy and reducing emissions of greenhouse gases that contribute to global climate change."* (emphasis added)
>
> *"(a) In all urban areas, coordinated land use and transportation plans are intended to provide safe and convenient vehicular circulation and to enhance, promote and facilitate safe and convenient pedestrian and bicycle travel by planning a well-connected network of streets and supporting improvements for all travel modes.* (emphasis added)
>
> *(b) In urban areas that contain a population greater than 25,000 persons, coordinated land use and transportation plans are intended to improve livability and accessibility by promoting the provision of transit service where feasible and more efficient performance of existing transportation facilities through transportation system management and demand management measures.* (emphasis added)
>
> *(c) Within metropolitan areas, coordinated land use and transportation plans are intended to improve livability and accessibility by promoting changes in the transportation system and land use patterns. A key outcome of this effort is a reduction in reliance on single occupant automobile use, particularly during peak periods. To accomplish this outcome, this division promotes increased planning for alternative modes and street connectivity and encourages land use patterns throughout urban areas that make it more convenient for people to walk, bicycle, use transit, use automobile travel more efficiently, and drive less to meet their daily needs. The result of applying these portions of the division will vary within metropolitan areas. Some parts of urban areas, such as downtowns, pedestrian districts, transit-oriented developments and other mixed-use, pedestrian-friendly centers, will be highly convenient for a variety of modes, including walking, bicycling and transit, while others will be auto-oriented and include more modest measures to accommodate access and circulation by other modes."* (emphasis added)

The RTSP and TSP promote increased planning for alternative modes and street connectivity.

The Springfield 2035 TSP contains multiple goals and polices which support implementation of OAR 660-012-0000(3) and Springfield's existing and proposed plan designations, existing land use efficiency measures and new 2030 Plan policies. These TSP policies include, but are not limited to:

TSP Goal 1: *Community Development – Provide an efficient, sustainable, diverse, and environmentally sound transportation system that supports and enhances Springfield's economy and land use patterns.*

TSP Policy 1.3: *Provide a multi-modal transportation system that supports mixed-use areas, major employment centers, recreation, commercial, residential, and public developments, to reduce reliance on single-occupancy vehicles (SOVs).*

TSP Policy 2.3: *Expand existing Transportation Demand Management (TDM) programs related to carpooling, alternate work schedules, walking, bicycling, and transit use in order to reduce peak hour congestion and reliance on SOVs.*

TSP Policy 2.5: *Coordinate with Lane Transit District (LTD) to increase the transit system's accessibility and convenience for all users, including the transportation-disadvantaged population. (NOTE Action 2: Monitor and adjust bus stop locations as needed to support surrounding land uses and provide more efficient and safe service).*

TSP Goal 3: System Design: *Enhance and expand Springfield's transportation system design to provide a complete range of transportation mode choices.*

TSP Policy 3.2: *Expand and enhance Springfield's bikeway system and provide bicycle system support facilities to both new development and redevelopment / expansion.*

TSP Policy 3.3: *Street design standards should be flexible and allow appropriate-sized local, collector, and arterial streets based upon traffic flow, geography, efficient land use, social, economic, and environmental impacts.*

TSP Policy 3.7: *Provide for a pedestrian environment that supports adjacent land uses and is designed to enhance the safety, comfort, and convenience of walking by providing direct routes and removing barriers when possible.*

TSP Policy 3.8: *Coordinate the design of Springfield's transportation system with relevant local, regional, and state agencies. (NOTE Action #3 – Partner with LTD to provide frequent transit network connections along major corridors. Frequent transit network should connect to local neighborhood bus service and major activity center to provide viable alternatives to vehicle trips).*

The 2030 Plan amendments support and advance TSP and RTSP coordinated land use and transportation planning policies and measures designed to increase transportation choices and make more efficient use of the existing transportation system. The City and Lane County adopted 2030 Plan policies and implementation strategies that are supportive of land use patterns that make it more convenient for

people to walk, bicycle, use transit, use automobile travel more efficiently, and drive less to meet their daily needs.

2030 Plan policies and the UGB amendment direct planned employment growth to existing employment centers and corridors serviced by the region's existing and planned public transit network. The UGB Alternatives Analysis considered "containing urban development, reducing the cost of public services, protecting farm and forest land, reducing air, water and noise pollution, conserving energy and reducing emissions of greenhouse gases that contribute to global climate change" when it compared the advantages and disadvantage of alternative expansion areas. The City's policy choices to absorb growth within the existing UGB, to reduce the size of the UGB expansion, and to expand the UGB expansion into two sites immediately adjacent to existing, developed industrial zones reduces VMT and the associated energy, air quality, GHG impacts compared to expanding into land more distant from the City.[36]

2030 Plan Urbanization Element Policy 51 states:

> ***"Grow and develop the City in ways that maintain and improve Springfield's air quality to benefit public health and the environment.***

- ***Prioritize and seek funding for mixed use land use district planning and multi-modal transportation projects that reduce reliance on single occupancy vehicles (SOVs) consistent with Springfield Transportation System Plan (TSP) Policy 1.2, 1.3 and 1.4.***
- ***Coordinate land use and transportation system planning for urbanizable lands at the refinement plan and/or Master Plan level to identify and conceptually plan alignments for locating multi – modal facilities.***
- ***Plan, zone and design transportation systems in the North Gateway and Mill Race Urban Holding Area - Employment districts to provide multi-modal transportation choices for district employees.***
- ***Promote the use of active transportation systems as new growth areas and significant new infrastructure are planned and developed."***

<u>2030 Comprehensive Plan policies to guide future transportation system planning.</u> To address Goal 12, the City and Lane County adopted policies in the 2030 Plan Urbanization Element to guide future transportation system planning to serve the lands added to the UGB through the subject UGB amendment:

2030 Plan Urbanization Element Policy 23 states:

> ***"Amend the Gateway Refinement Plan to include the North Gateway UHA-E area prior to or concurrent with approval of an owner-initiated plan amendment or zone change***

[36] The City's findings under Goal 14, page 388 explain how comparative VMT associated impacts were considered in the UGB Boundary Alternatives Analysis conducted under OAR 660-024-0060.

that allows urban development in the North Gateway UHA-E area. The amended Gateway Refinement Plan shall describe the logical extension of transportation and public facilities to serve the entire North Gateway UHA-E area."

2030 Plan Urbanization Element Policy 39 states:

"The North Gateway and Mill Race districts shall be planned and designed to encourage and support the availability of a variety of transportation choices for moving people that balance vehicular use with other transportation modes, including walking, bicycling and transit in order to avoid principal reliance upon any one mode of transportation; support the mobility needs of the transportation disadvantaged; and provide for safe and convenient vehicular, transit, pedestrian, and bicycle access and circulation. Plan and zoning amendments shall include a transportation system analysis and plan to demonstrate compliance with Statewide planning Goal 12 and Goal 12 administrative rules."

2030 Plan Urbanization Element Policy 40 states:

"Public transportation systems shall be designed to facilitate future extension of the public transit system to serve the North Gateway district."

2030 Plan Urbanization Element Policy 27 states:

"The coordinated, timely provision of urban services is a central element of the City's comprehensive growth management strategy for infill, redevelopment and new development. Development undertaken in pursuit of housing goals, diversifying the economy and neighborhood livability shall occur only after the logical and efficient delivery of all urban services have been provided to these sites.

- ***Prepare and adopt comprehensive plan and zoning updates at the neighborhood, district, and corridor scale to determine the density, character and design of urban development in alignment with infrastructure capacity to ensure efficient and economical delivery of urban services in balance with the City's financial resources."***

2030 Plan Urbanization Element Policy 28 states:

"Regionally significant public investments within Springfield's UGB shall be planned on a metropolitan-wide basis, as described in the regional transportation and public facilities plans."

2030 Plan Urbanization Element Policy 24 states:

"Lands added to the UGB in 2016 for employment, public facilities, parks, open space and recreation in the Mill Race area shall be comprehensively planned in the context

of a larger Mill Race District that includes the Booth Kelly Mixed Use site and the industrially-zoned lands south of the railroad corridor. The plan shall identify opportunities for integrating economic development, recreation, arts, culture, historic interpretation, and pedestrian/bicycle connectivity between the Middle Fork Willamette River and Downtown District; and shall identify development standards that protect Drinking Water Source Areas and other natural resources from incompatible development."

Conclusion 660-012-0000(2) and (3): The acknowledged Springfield TSP and 2030 Plan amendments were coordinated to advance the objectives of OAR 660-012-0000(2) and (3).

OAR 660-012-0015(3)
OAR 660-012-0015(4)
OAR 660-012-0016(1)

As previously explained, Springfield has acknowledged regional and local Transportation System Plans establishing a system of transportation facilities and services adequate to meet identified local transportation needs, consistent with adopted elements of the state TSP, as required in OAR 660-012-0015(3) and (4), and OAR 660-012-0016(1)

OAR 660-012-0020 Elements of Transportation System Plans
OAR 660-012-0025 Complying with the Goals in Preparing Transportation System Plans; Refinement Plans

Springfield's comprehensive plan — consisting of the acknowledged Metro Plan as further refined and augmented through acknowledgement of the local TSP, Springfield 2030 Comprehensive Plan and Springfield's seven acknowledged neighborhood refinement plans — coordinate land use planning with the local and regional transportation plans allocating urban population density and employment to designated centers and other identified areas in the MPO to provide for implementation of the metropolitan area's integrated land use and transportation plan or strategy.

Springfield's TSP was previously acknowledged to be consistent with Division 12 and the Central Lane MPO's Regional Transportation Plan (RTP). TSPs for cities and counties located within an MPO area must be consistent with both the Division 12 Transportation Planning Rule (TPR) and the MPO's Regional Transportation Plan (RTP), which is adopted to meet Federal requirements. The TPR distinguishes requirements for communities based on population size. Given Springfield's population and the fact that it is a member of the Central Lane MPO, the following elements addressed in the acknowledged Springfield TSP:

- A determination of transportation system needs;
- State, regional, and local transportation needs;
- Needs of the transportation disadvantaged;

- Needs for movement of goods and services to support industrial and commercial development planned for pursuant to OAR 660-009 and Goal 9;
- Calculation of local and regional transportation needs based upon accomplishment of the requirement in OAR 660-012-0035(4) to reduce reliance on the automobile;
- System design to support increasing transportation choices and reducing automobile reliance;
- A road plan for a system of arterials and collectors and standards for the layout of local streets and other important non-collector street connections.
- Functional classifications of roads in the Springfield TSP are consistent with functional classifications of roads in state and regional TSPs and provide for continuity between adjacent jurisdictions;
- The standards for the layout of local streets shall provide for safe and convenient bike and pedestrian circulation necessary to carry out OAR 660-012-0045(3)(b);
- New connections to arterials and state highways consistent with designated access management categories;
- A public transportation plan that describes public transportation services for the transportation disadvantaged and identifies service inadequacies; intercity bus and passenger rail service and identifies the location of terminals; and identifies existing and planned transit trunk routes, exclusive transit ways, terminals and major transfer stations, major transit stops, and park-and-ride stations;
- A bicycle and pedestrian plan for a network of bicycle and pedestrian routes throughout the planning area consistent with the requirements of ORS 366.514;
- A rail, water and pipeline transportation plan which identifies where mainline and branchline railroads and railroad facilities, port facilities, and major regional pipelines and terminals are located or planned within the planning area;
- A plan for transportation system management and demand management;
- A parking plan as provided in OAR 660-012-0045(5)(c);
- Policies and land use regulations for implementing the TSP as provided in OAR 660-012-0045

The TSP supersedes *TransPlan* as the City's specific refinement of the Eugene-Springfield Comprehensive General Plan (Metro Plan) insofar as it affects land within the existing Springfield UGB. The TSP adoption findings confirmed that the TSP is consistent with the Metro Plan and *TransPlan*. *TransPlan* will remain in effect as the region's Regional Transportation System Plan (RTSP) until such time as a new RTSP is

adopted by the partner jurisdictions. An updated *RTSP* is being developed through a regional process as outlined in a work plan agreed to with the Land Conservation and Development Commission.[37]

The Springfield 2035 Transportation System Plan (2035 TSP) meets state requirements for a transportation system plan and is a resource for future transportation decision making. The 2035 TSP identifies the preferred future multi-modal transportation system and the City's policies related to the transportation system. It also identifies the function, capacity, and location of future facilities, and identifies planning-level costs for needed improvements to support expected development and growth and possible sources of system funding. This TSP is intended to provide the City with flexibility as staff, the public, and decision makers prioritize and fund critical transportation investments. The TSP provides:

- *A blueprint for transportation investment*
- *A tool for coordination with regional agencies and local jurisdictions*
- *Information to ensure prudent and effective land use choices*
- *Solutions to address existing and future transportation needs for bicycles, pedestrians, transit, vehicles, freight, and rail*

The TSP is the transportation element of and a supporting document to Springfield's current comprehensive planning document (Metro Plan, 2004 update) as required by state law. The City updated the 2035 TSP goals and policies during the planning process to implement the Goal 12: Transportation Element of the Metro Plan.

Oregon Transportation Plan (OTP) Policy 2.2 – Management of Assets "It is the policy of the State of Oregon to manage transportation assets to extend their life and reduce maintenance costs."

The 2030 Plan addresses transportation/land use planning coordination for employment sites added to the UGB. Urbanization Element Policy 38 requires that the TSP be updated an adopted prior to or concurrently with any plan or zoning amendment that allows an increase in trips over levels permitted in the AG zone and before any urban level develop can occur in the UGB expansion areas:

> ***"To ensure that changes to the Springfield Comprehensive Plan are supported by adequate planned transportation facilities, <u>the City shall update and adopt amendments to the Springfield Transportation System Plan (TSP)</u> to identify facilities that may be needed to provide and encourage a safe, convenient and economic multi-modal transportation system to support development of urban uses and densities in the North Gateway and Mill Race areas. <u>The TSP update shall be coordinated with City-initiated comprehensive land use planning or owner-initiated plan amendments and shall be prepared and adopted prior to or concurrently with any plan or zoning amendment that allows an increase in trips over the levels permitted in the AG zone</u>."***
> (emphasis added)

Urbanization Element Policy 39 requires:

[37] Springfield Ordinance 6314

> ***"The North Gateway and Mill Race districts shall be planned and designed to encourage and support the availability of a variety of transportation choices for moving people that balance vehicular use with other transportation modes, including walking, bicycling and transit in order to avoid principal reliance upon any one mode of transportation; support the mobility needs of the transportation disadvantaged; and provide for safe and convenient vehicular, transit, pedestrian, and bicycle access and circulation. Plan and zoning amendments shall include a transportation system analysis and plan to demonstrate compliance with Statewide planning Goal 12 and Goal 12 administrative rules."*** (emphasis added)

Urbanization Element Policy 49 prohibits regional retail uses in the UGB expansion areas:

> ***"Employment Lands designated UHA-E shall be planned and zoned as economic districts that provide and promote suitable sites for clean manufacturing[38] uses and office/tech/flex employers in Springfield's target industry sectors. Limited neighborhood-scale retail uses that primarily serve employees within an industrial or office building or complex may be permitted as a secondary element within employment mixed-use zones. Urban Holding Area-Employment (UHA- E) sites shall not be re-designated or zoned to permit development of regional retail commercial uses.***" (emphasis added)

Springfield's existing transportation capacity and operational efficiency was measured through the TSP process. Future transportation capacity and operational efficiency will be measured through use of Lane Council of Governments (LCOG) Regional Transportation Model.

The acknowledged TSP is consistent with the statewide Transportation Planning Rule and the Central Lane MPO's Regional Transportation Plan (RTP) as required under OAR 660-012-0016. TSPs for cities and counties located within an MPO area must be consistent with both the statewide Transportation Planning Rule and the MPO's Regional Transportation Plan (RTP), which is adopted to meet Federal requirements.

The Central Lane MPO RTP meets federal guidelines for the area and guides regional transportation system planning and development. The RTP currently has a planning horizon that goes beyond the planning horizons of the Metro Plan and *TransPlan*. The RTP is updated every four years. Springfield's TSP is consistent with the most currently updated RTP.

The 2030 Plan Springfield's comprehensive plan and the proposed 2030 Plan elements and UGB amendment has been coordinated with the RTP.

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[38] For the purposes of this policy, "clean" is defined as land uses, construction practices, and business operations that minimize waste and environmental impacts, and that contribute to a safe, healthy, and clean community, maintain the aquifer recharge capacity of the site by reducing impervious surfaces, and protect Springfield's drinking water source areas from contamination.

Conclusion 660-012-0020, OAR 660-012-0025, OAR 660-012-0030 (1), (2). The acknowledged Springfield TSP and 2030 Plan amendments were coordinated to comply with 660-012-0020, OAR and 660-012-0025.

OAR 660-012-0030 Determination of Transportation Needs

OAR 660-012-0030(1)

OAR 660-012-0030(2)

Conclusion OAR 660-012-0030 (1) and (2). The acknowledged Springfield TSP and 2030 Plan Economic and Urbanization Element policies and UGB amendments were coordinated to identify transportation needs relevant to the planning area including state, regional and local needs; the needs of the transportation disadvantaged; the needs for movement of goods and services to support industrial and commercial development as described in the City's findings under Goal 9 and Goal 14. The TSP is acknowledged to be in compliance with OAR 660-009-0030 (1), and (2). Future updates to the TSP are required to address the needs for movement of goods and services to support industrial and commercial development in the UGB expansion areas, as required by 2030 Urbanization Element policies[39] and Springfield Development Code land use regulations adopted by the City and Lane County in Ordinance Exhibits C-1 and E.

OAR 660-012-0030(3)

> *"Within urban growth boundaries, the determination of local and regional transportation needs shall be based upon:*
>
> *(a) Population and employment forecasts and distributions that are consistent with the acknowledged comprehensive plan, including those policies that implement Goal 14. Forecasts and distributions shall be for 20 years and, if desired, for longer periods; and*
>
> *(b) Measures adopted pursuant to OAR 660-012-0045 to encourage reduced reliance on the automobile."*

The planning year horizon for the acknowledged Springfield TSP is 2035, consistent with the Regional Transportation Plan (RTP), which is also 2035. The planning year horizon for the current RTSP (i.e. TransPlan) is 2025 (as amended in 2010).

Springfield's previously acknowledged UGB provides adequate residential land to accommodate the forecast population growth for the 2010-2030 planning period by designating land to meet the City's deficit of high density residential land. [40] The acknowledged TSP was planned in coordination with the 2010-2030 forecast residential land need. The transportation model used in the Springfield TSP used

[39] Exhibit C-1Urbanization Element Policy 38 and 39

[40] Springfield Ordinance 6316 Glenwood Refinement Plan Phase One amendments included measures adopted pursuant to OAR 660-012-0045 to encourage reduced reliance on the automobile.

the Springfield 2035 BUILD 1 (full build) model, which incorporates the Springfield 2030 land use plan. The coordinated population for Springfield created by PSU/PRC was used to derive population and housing growth for the model study area.[41] The employment forecast was made by LCOG based on historical trends. Land use was allocated in the TSP as described in the acknowledged Springfield Residential Land Use and Housing Element.[42] The determination of transportation needs in the TSP was based on measures adopted pursuant to OAR 660-012-0045 to encourage reduced reliance on the automobile. 2010-2030 residential growth needs were addressed in the TSP. The planned transportation system addresses transportation needs.

It is important to note that based on the population and employment forecast comparisons used in the recent transportation system modelling work, "it can be concluded that the travel demand forecasts associated with the needs, projects, and policies identified in the 2035 Springfield TSP are less than the 2025 TransPlan travel demand forecasts. As a result, from an operational forecast standpoint, the 2035 Springfield TSP is consistent with TransPlan."[43]

TSP Update to address 2030 UGB/Employment Forecast. Springfield's CIBL/EOA identified a need to expand the UGB to accommodate future employment land needs. Because a UGB expansion had not yet occurred when the TSP was adopted, the TSP addressed land uses within Springfield's existing UGB. Subsequent to acknowledgement of the 2030 Plan and UGB amendment, the TSP will need to be updated as necessary before any urban level development that increases trips over existing rural levels can occur in the UGB expansion areas.[44] As previously stated, the 2030 Urbanization Element policies (Ordinance Exhibit A-2, C-1, D) and Springfield Development Code land use regulations (Ordinance Exhibit A-3 and E) adopted by the City and Lane County ensure that the TSP is updated to reflect the Springfield 2030 employment forecast adopted into the Comprehensive Plan (Ordinance Exhibit B-2) and to provide distributions that are consistent with the comprehensive plan as amended through acknowledgement of the subject ordinance, including the 2030 Plan designations and policies that implement Goal 14.

2030 Plan Urbanization Element Policy 38 states:

> ***"To ensure that changes to the Springfield Comprehensive Plan are supported by adequate planned transportation facilities, the City shall update and adopt amendments to the Springfield Transportation System Plan (TSP) to identify facilities that may be needed to provide and encourage a safe, convenient and economic multi-***

[41] For more detailed information see Springfield Ordinance No. 6314, Springfield File No. TYP413-00009, TSP Staff Report Exhibit A 2/24/14.

[42] For example, the TSP allocated high density residential land uses in the Glenwood Residential Mixed-Use district, based on the Glenwood Refinement Plan Phase One plan amendments and Glenwood Plan District zoning code. The area is designed Mixed Use Nodal Development in the Metro Plan and was granted one of the first Multi-modal Mixed Use Area (MMA) designations in the state.

[43] Springfield Ordinance No. 6314, Springfield File No. TYP413-00009, TSP Staff Report Exhibit A 2/24/14, p. 3.

[44] As explained in the City's detailed findings under Goal 14 Public Facilities Analyses, and supported by evidence in the form of maps and adopted facilities plans in the local record, both UGB expansion areas would be served by existing or planned transportation facilities or projects already assumed and identified in the TSP.

modal transportation system to support development of urban uses and densities in the North Gateway and Mill Race areas. The TSP update shall be coordinated with City-initiated comprehensive land use planning or owner-initiated plan amendments and shall be prepared and adopted prior to or concurrently with any plan or zoning amendment that allows an increase in trips over the levels permitted in the AG zone."

The City's findings under Goal 14, (pages 218-239 of this report, and Tables 5, 11, and 17) identify the facilities plans the City to determine infrastructure and public facilities needs in the Boundary Alternatives Analysis. The City's findings under Goal 14, Factor 3 ESEE Consequences p. 388-393 address transportation impacts related to distance from the city and from major transportation facilities.

Conclusion OAR 660-012-0030 (3). The acknowledged Springfield TSP was coordinated with Springfield 2030 population forecasts and land use distributions that are consistent with the acknowledged comprehensive plan. The 2030 Plan amendments require transportation planning updates prior to any plan or zoning amendment that allows urban levels of development in the UGB expansion areas designated UHA-E. The acknowledged Springfield TSP and comprehensive plan, and the subject 2030 Plan amendments support implementation of land use patterns and transportation system improvements to encourage reduced reliance on the automobile.

OAR 660-012-0035(1),(3),(4), (5) and (6)

Transportation and land use coordination policies intended to provide a transportation system to support economic development and goods movement while reducing reliance on the automobile were relevant to the Springfield 2035 TSP and are highly relevant to 2030 Plan. The findings for the TSP[45] provide explanation:

"The 2035 Springfield TSP is also consistent with the 2002 TransPlan from a goals and policy standpoint. Attachment B is a memorandum that provides a comparison and consistency evaluation between the draft goals for the RTSP update and policies contained in the Eugene, Springfield, and Coburg TSPs currently being prepared, and the existing Lane County TSPs and TransPlan. Each of these documents has very similar goal and policy objectives and in no way in conflict with each other to the extent that any one plan might undermine the implementation of another. It should be noted that while the Springfield 2035 TSP does not specifically address or include the nodal growth policies that are identified in the 2002 TransPlan, there is nothing in the 2035 Springfield TSP that would inhibit or discourage the potential for growth in the nodal areas that have already been established in Springfield's current comprehensive land use planning document (Metro Plan, 2004 update) and enabled through the City's zoning and development code. Additionally, a similar or greater lever of alternative travel mode projects are identified for implementation in these areas compared to TransPlan. Consequently, with the 2002 TransPlan still in effect as the adopted RTSP for the Central Lane MPO area and with the Metro Plan still serving as the City's comprehensive land

[45] Springfield Ordinance No. 6314, Springfield File No. TYP413-00009, TSP Staff Report Exhibit A 2/24/14, p. 4-35.

use planning document, adoption of the 2035 Springfield TSP will not interfere with or undermine continued implementation and evaluation of TPR compliance or progress as periodically assessed through the currently adopted 2002 TransPlan performance measures." (emphasis added)

As stated in TSP staff report[46], the projects, plans and policies in the acknowledged TSP support implementation of the 2002 TransPlan performance measures:

> *"The TSP policies in Chapter 2, the transportation planning toolbox and the recommended projects in Chapter 5 are all based on the premise of reducing reliance on the automobile in the future. The majority of the recommended projects are either transit, new off-street pedestrian and bicycle facilities, and/or upgrades to existing streets to add pedestrian and bicycle features. There are very few projects aimed solely at facilitating motor vehicle mobility. Further, the city is exploring alternative mobility standards at key locations to reduce the need for and impact of roadway improvement projects on state facilities."* (emphasis added)

> *"In addition, the land use allocation of jobs and households that serves as the basis for the LCOG travel demand model focusses the majority of the growth in key redevelopment opportunity areas within the City, such as the Glenwood Riverfront Area, Downtown, Gateway, and Jasper-Natron. Noted in TransPlan as nodal areas, these areas are intended as mixed use, high density environments that will require a robust pedestrian, bicycle and transit infrastructure."* (emphasis added)

The 2030 Plan designates employment land to provide efficient freight/goods movement to support economic development.

Metro Plan Transportation Element p. III-F-11 states:

> *"The OTP recognizes that goods movement of all types makes a significant contribution to the region's economy and wealth and contributes to residents' quality of life. OTP Policy 3A promotes a balanced freight transportation system that takes advantage of the inherent efficiencies of each mode."*
>
> *"Goods movement is directly supported by system-wide and roadway transportation system improvements."*

The 2030 Plan provides coordinated land use and transportation policies intended to provide a transportation system to support economic development and goods movement — consistent with Metro Plan Transportation Element Policy F.29 which states:

> *"Support reasonable and reliable travel times for freight/goods movement in the Eugene Springfield region."*

[46] Springfield Ordinance No. 6314, Springfield File No. TYP413-00009, TSP Staff Report, Attachment 1, p. 15.

The 2030 Plan designates employment growth areas with convenient access to I-5, and State Highways and truck routes to facilitate movement of goods.

Metro Plan Transportation Element p. III-F-1 describes the transportation planning strategies addressed in the Metro Plan Transportation Element to implement a safe, convenient, and economic transportation system in compliance with Goal 12:

> *"Three types of transportation planning strategies are reflected in the goals and policies in this element: transportation demand management (TDM), land use, and system improvements. TDM strategies focus on reducing demands placed on the transportation system, and thus system costs, by providing incentives to redistribute or eliminate vehicle trips and by encouraging alternative modes. Land use strategies focus on encouraging development patterns that reduce the need for automobiles, reduce trip lengths, and support the use of alternative modes. System improvements focus on increasing efficiency and adding capacity or new facilities to the existing highway, transit, bicycle, and pedestrian systems.* (emphasis added).
>
> *Together, these strategies form a balanced policy framework for meeting local and state transportation goals to: increase urban public transit rider-ship; reduce reliance on the automobile; substitute automobile trips with alternative modes, such as walking and biking; and reduce automobile energy consumption and transportation costs.*
>
> *Not all Transportation Element policies will apply to a specific transportation-related decision. When conformance with adopted policy is required, policies in this and other Metro Plan elements will be examined to determine which policies are relevant and can be applied. When policies support varying positions, decision makers will seek a balance of all applicable policies. Goals are timeless, but some policies will expire as they are implemented."*

As stated in the adopted Springfield TSP findings, Springfield Ordinance 6314 Exhibit A:

> *"However, it should be noted that the 2002 TransPlan continues to serve as the region's Transportation Planning Rule (TPR) required RTSP until such time as a new RTSP is adopted by the appropriate MPO jurisdictions. The performance measures by which progress towards meeting TPR requirements over the TransPlan planning horizon are evaluated for the Central Lane MPO area shall also remain in effect until (1) both Eugene and Springfield have completed updates to their land use and transportation plans, (2) a new assessment (based on analysis from both new local TSPs) of how well the Region is addressing TPR requirements is completed, (3) a determination of how or if the current performance measures need to be updated is completed, and (4) a new RTSP is completed and adopted. Because it is important that the local TSP for Springfield*

continues to support the policies and general objectives of the 2002 TransPlan until a new RTSP is adopted, Staff has prepared findings confirming that the Springfield TSP is consistent with the 2002 TransPlan."

As stated in the adopted Springfield TSP findings, Springfield Ordinance 6314 Exhibit A:

> *"For the purpose of serving as Springfield's local TSP, TransPlan will be replaced by the Springfield 2035 TSP. However, TransPlan will continue to serve as the Regional Transportation System Plan (RTSP) for Eugene and Springfield until a new RTSP is adopted. An updated RTSP is being developed through a regional process described in a work plan agreed to with the Land Conservation and Development Commission. The Central Lane MPO member jurisdictions are in the process of refining the task details and timelines in the existing RTSP update work plan with LCDC to more accurately reflect the coordination challenges and various dependencies between the RTSP, local TSP, and land use planning work that is underway. This includes future work needed to assess compliance with the TPR per capita VMT reduction requirements or assess and incorporate updated performance measures in the Regional Transportation System Plan (RTSP) based on the analysis conducted for the Springfield and Eugene TSPs <u>after each local TSP is reconciled with any land use plan changes that are made through the processes that are currently underway.</u> As previously noted, until that work is complete, the current 2002 TransPlan and its performance measures will remain in effect."*
> (emphasis added)

Metro Plan Transportation Element Policies F.1, F.2, F.3, and F.4 coordinating transportation planning with plan use planning are implemented through the projects, programs and policies in the Springfield TSP and through Springfield's acknowledged comprehensive plan land use designations and land use regulations.

Policy F.1: "*Apply the nodal development strategy in areas selected by each jurisdiction that have identified potential for this type of transportation-efficient land use pattern."*

Policy F.2: "*Support application of the nodal development strategy in designated areas through information, technical assistance, or incentives."*

Policy F.3: "*Provide for transit-supportive land use patterns and development, including higher intensity, transit-oriented development along major transit corridors and near transit stations; medium- and high-density residential development within ¼ mile of transit stations, major transit corridors, employment centers, and downtown areas; and development and redevelopment in designated areas that are or could be well served by existing or planned transit."*

Policy F.4: "*Require improvements that encourage transit, bicycles, and pedestrians in new commercial, public, mixed use, and multi-unit residential development."*

The Metro Plan[47] defines Nodal development (node) as follows:

> ***"Nodal development (node)*: Nodal development is a mixed-use, pedestrian-friendly land use pattern that seeks to increase concentrations of population and employment in well-defined areas with good transit service, a mix of diverse and compatible land uses, and public and private improvements designed to be pedestrian and transit oriented. Fundamental characteristics of nodal development require:**
>
> - ***Design elements that support pedestrian environments and encourage transit use, walking and bicycling;***
> - ***A transit stop which is within walking distance (generally ¼ mile) of anywhere in the node);***
> - ***Mixed uses so that services are available within walking distance;***
> - ***Public spaces, such as parks, public and private open space, and public facilities, that can be reached without driving; and***
> - ***A mix of housing types and residential densities that achieve an overall net density of at least 12 units per net acre.***
>
> ***Nodal developments will vary in the amount, type, and orientation of commercial, civic, and employment uses; target commercial floor area ratios; size of building; and the amount and types of residential uses."***

As demonstrated in the TSP findings, the acknowledged Springfield TSP provides local comprehensive plan coordinated land use-transportation policies consistent with relevant Metro Plan Transportation Element Land Use Policies F.1, F.2, F.3, and F.4.

The subject 2030 Plan amendments (Ordinance Exhibits B, C, D and E) provide local comprehensive plan land use goals, policies and implementation strategies coordinated with transportation policies, programs, projects and strategies consistent with relevant Metro Plan Transportation Element Land Use Policies F.1, F.2, F.3, and F.4. The City's 2030 Plan emphasizes a compact urban growth pattern, by providing land to meet all employment land needs for sites smaller than 5 acres within the existing UGB.[48]

The City's previously acknowledged 2030 Plan Residential Land and Housing Element Policies and land use efficiency measures and densities allocate all residential and housing growth needs to lands within the existing UGB.[49]

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[47] Metro Plan Chapter V Glossary, p.V-4.

[48] As explained in the CIBL/EOA and the City's findings under Goal 9.

[49] Acknowledged 2030 Residential Land Use and Housing Policy H.1 densities support transit: Residential Low Density 6-14 du/acre, Residential Special Density 8-14, Residential Medium Density 14-28 du/acre, Residential High Density 28-42 du/acre, Springfield Development Code Glenwood Plan District Residential Mixed Use 50 du/ac minimum, no maximum, Mixed Use Residential MUR 20 du/acre minimum; MUC no maximum. Policy H.3 and implementation actions 3.1, 3.2, 3.3, 3.4; Policy H.4; Policy H.5;Policy H.7 and implementation actions 7.1, 7.2, 7.4; Policy H.10;Policy H.13.

The 2030 Comprehensive Plan Economic and Urbanization Elements address the integral relationship between transportation systems and land use in comprehensive planning though land use plan amendments and policies that direct urban development and urban expansion to areas identified as necessary and suitable for urban development; and through policies that address (1) the need for all modes of transportation to support economic development and livability including mass transit, rail, highway, bicycle and pedestrian; (2) the transportation needs of the workforce and target industry employers based on Springfield's Economic Opportunities Analysis; (3) avoiding principal reliance upon any one mode of transportation; (4) minimizing adverse social, economic and environmental impacts and costs; (5) conserving energy by reducing travel distance; (6) meeting the needs of the transportation disadvantaged by improving access to transportation services; and (7) locating employment centers to facilitate the flow of goods and services so as to strengthen the local, regional and state economy.

The employment forecast identifies a need to provide sites for 13,000 + new jobs through 2030. The integral relationship between transportation facilities and services and employment land uses was a consideration of utmost importance in the City's evaluation of options to accommodate employment growth and diversification of the economy both within the existing UGB and in the expansion areas. The 2030 Plan assumes 46% of the needed job growth will locate on lands already developed, and 31% on vacant sites within the existing urbanizable area. The City needs to expand the UGB to add 223 acres of suitable, large sites to its employment land inventory - accommodating 23% of job growth. Decreasing the distance needed to travel to and from these new employment and industrial areas added to the UGB and to and from redevelopment employment and industrial areas within the city is an important consideration used by the City to evaluate options for accommodating forecast employment growth. Suitable, well-located employment sites will facilitate the safe, efficient and economic flow of freight and other goods and services within the region and throughout the state. The City's Goal 14 Boundary Alternatives Analysis evaluated potential growth areas to determine whether new jobs would be located within ½ mile of planned centers, districts, and corridors served by the regions' Frequent Transit Network (FTN).

<u>The 2030 Plan emphasizes and provides policy support for redevelopment and new development that increases capacity in areas served by transit.</u> Needed employment in new employment areas added to the UGB, within existing employment areas and in redevelopment employment areas within the city should be located where adequate transportation facilities already exist, are planned or can be logically and efficiently extended to ensure that jobs are accessible via a choice of transportation modes including modes accessible to the transportation disadvantaged. The 2030 Comprehensive Plan allocates the majority of new jobs to employment land within ½ mile of planned centers, districts, and corridors served by the regions' Frequent Transit Network (FTN). Adding suitable large employment sites to existing employment centers supports the availability of a variety of transportation choices for moving people that balance vehicular use with other transportation modes, including walking, bicycling and transit in order to avoid principal reliance upon any one mode of transportation. This strategy

promotes equity and opportunity by ensuring that access to jobs is possible through the region's public transit network.

2030 Plan Urbanization Element Goal UG-1 states:

> ***"Promote compact, orderly and efficient urban development by guiding future growth to vacant sites and redevelopment areas within the established areas of the city and to urbanizable lands where future annexation and development may occur."***

2030 Plan Urbanization Element Policy 2 states:

> ***"Continue to support and facilitate redevelopment and efficient urbanization through City-initiated area-specific refinement planning and zoning amendments consistent with the policies of this Plan. Plans shall designate an adequate and competitive supply of land to facilitate short-term and long-term redevelopment activity. Efficiency measures achieved through plan amendments may be reflected in land supply calculations to the extent that they are likely to increase capacity of land suitable and available to meet identified needs during the relevant planning period.***
>
> - ***Continue to provide public policy and financial support when possible for redevelopment in Springfield.***
> - ***Continue to prioritize and incentivize redevelopment in the Glenwood and Downtown urban renewal districts and support redevelopment throughout the City as described in the Economic and Residential Elements of this Plan.***
> - ***Continue to provide development tools and incentives (such as Urban Renewal support) within targeted priority redevelopment areas as resources become available to facilitate expedient and economically feasible redevelopment.***
> - ***Continue to conduct focused planning in key redevelopment areas, as directed by the City Council, as resources are available. Such efforts will review, update and supersede existing refinement plan designations and policies.***
> - ***Identify and include public agencies and private stakeholder partners in district-specific planning efforts to facilitate redevelopment through partnerships and other cooperative relationships."***

2030 Plan Urbanization Element Goal UG-2 states:

> ***"Promote efficient and economical patterns of mixed land uses and development densities that locate a variety of different life activities, such as employment, housing, shopping and recreation in convenient proximity; and where accessible by multiple modes of transportation — including walking, bicycling, and transit in addition to motor vehicles — both within and between neighborhoods and districts."***

2030 Plan Urbanization policies identify the City's strategies for providing public incentives to assist redevelopment of sites to meet employment land needs, as resources are available.

2030 Plan Urbanization Element Policy 17 states:

> ***"In new growth and redevelopment areas throughout the City, plan and support the transition to transportation-efficient land use patterns by providing incentives such as City-initiated plan and zoning updates, technical assistance, implementation of design standards, and permit processing assistance to guide the development of well-designed neighborhoods, efficient and economically viable mixed use districts and corridors."***

2030 Plan Urbanization Element Policy 18 states:

> ***"Within districts and neighborhoods currently characterized by a limited range of land uses and activities, pursue comprehensive planning and zoning code updates to allow for mixed-use development at appropriate locations as one method of providing additional land use diversity and choices — as described in the Economic and Residential Land Use Elements of this plan."***

2030 Plan Urbanization Element Policy 19 states:

> ***"Support new development and redevelopment in mixed use areas to address Springfield's needs for housing, employment, and shopping opportunities in connected walkable neighborhood locations served by the region's frequent transit network (FTN)."***

2030 Plan Urbanization Element Policy 20 states:

> ***"Plan and zone land to support transit-oriented land use patterns and development, including but not limited to higher intensity development in the City's employment and commercial centers and along major transit corridors; employment uses located within ¼ mile of transit stations or stops; and residential development within ½ mile of transit stations or stops."***

2030 Plan Urbanization Element Policy 21 states:

> ***"As permitted under Oregon law, require improvements in new commercial, public, mixed use, and multi-unit residential development that encourage walking, bicycling and the use of transit."***

2030 Plan Urbanization Element Policy 36 states:

> ***"The City shall continue to seek funding opportunities and public-private partnerships to allow construction of key urban infrastructure elements to support pedestrian and transit-friendly redevelopment in Glenwood and Downtown, such as the Franklin Corridor multiway boulevard in Glenwood and enhancements to the Main Street/South A couplet through Downtown."***

2030 Plan Urbanization Element Policy 39 and 40 address multi modal transportation planning requirements for the UGB expansion areas:

> ***"The North Gateway and Mill Race districts shall be planned and designed to encourage and support the availability of a variety of transportation choices for moving people that balance vehicular use with other transportation modes, including walking, bicycling and transit in order to avoid principal reliance upon any one mode of transportation; support the mobility needs of the transportation disadvantaged; and provide for safe and convenient vehicular, transit, pedestrian, and bicycle access and circulation. Plan and zoning amendments shall include a transportation system analysis and plan to demonstrate compliance with Statewide planning Goal 12 and Goal 12 administrative rules."*** (Policy 39)
>
> ***"Public transportation systems shall be designed to facilitate future extension of the public transit system to serve the North Gateway district."*** (Policy 40)

The City's North Gateway and Mill Race districts designate suitable employment land to provide additional employment capacity on sites immediately abutting land previously identified as "Potential Nodes" in TransPlan. This action designates land to expand existing employment areas in support of new employment occurring in walkable centers and corridors served by the region's Frequent Transit Network.

2030 Plan Economic Element Policies support employment growth within existing Nodal Development (ND) designated areas (RiverBend: Ordinance 6241, Downtown: Ordinance 6146, Marcola Meadows – Ordinance 6195; Glenwood - Ordinance 6316); 30th and Main – Ordinance 6177); and approved Glenwood Mixed Use Multi Modal Areas (MMAs): Ordinance 6316; and existing employment centers served by transit, as described in the City's findings under Goal 9. This action supports development of new employment occurring in connected, walkable employment centers and corridors served by the region's Frequent Transit Network. Over 400 additional units of High Density Mixed-Use Residential housing are planned at the Glenwood site. 518 units of Medium Density Residential housing are planned at the Marcola Meadows site.[50]

2030 Plan Economic Element Policies support designation and zoning of land to increase employment in Mixed-Use areas, as described in the City's findings under Goal 9. This action supports development of new employment occurring in connected, walkable employment centers and corridors served by the region's Frequent Transit Network.

The CIBL/EOA identified location relative to transit routes as a "characteristic of needed sites" for some of Springfield's target industry employers that require sites larger than 5 acres, as described in the

[50] City File No. LRP2007-00028 The Villages at Marcola Meadows Final Master Plan, approved July 3, 2008, recorded July 25, 2008.

CIBL/EOA and in the City's findings under Goal 9. This action supports development of needed larger employment sites and new employment occurring in connected, walkable employment centers and corridors served by the region's Frequent Transit Network. An example of this pattern working in Springfield is the International Way and RiverBend employment center served by the Gateway EmX Bus Rapid Transit service.[51] 730 units of Medium Density Residential housing are planned for the RiverBend site.[52]

In the City's 2030 Plan UGB Boundary Location Alternatives Analysis under Goal 14, the City considered location relative to transit routes as a "characteristic of needed sites" for some of Springfield's target industry employers, and thus evaluated alternatives on the basis of being able to provide suitable sites for large employers in locations within a ½ mile of existing or planned Frequent Transit Network (FTN) public transit routes.

Updating Alternative Performance Measures. Eugene and Springfield reported regularly on progress meeting Alternative Performance Measures benchmarks though 2011.[53] No request from LCDC to report again after 2011 was made. As noted on page 485-486, an updated Regional Transportation System Plan (RTSP) is being developed through a regional process, as outlined in the Central Lane MPO Unified Planning Work Program. That plan is expected to address the next iteration of Alternative Performance Measures and targets.

Scenario Planning. The record provides documentation of the Scenario Planning process[54] and how the 2030 Plan amendments and TSP policies and projects were integrated into the modelling of the "base case" for analysis and consideration of potential measures to reduce greenhouse gas emissions.

Conclusion OAR 660-012-0035(4),(5) and (6): The subject 2030 Plan amendments include local comprehensive plan land use policies, land use designations and land use regulations that are coordinated with the acknowledged TSP and RTSP to support implementation of relevant Metro Plan Transportation Element and Use Policies F.1, F.2, F.3, and F.4 and relevant requirements of OAR 660-012-0035 (4) and (5).

Conclusions OAR 660-012-0035. The subject 2030 Plan amendments include local comprehensive plan Economic Element and Urbanization Element land use policies (Ordinance Exhibit B and C) coordinated with transportation policies to support provision of transit-supportive land use patterns and development, including higher intensity, transit-oriented development along major transit corridors and near transit stations; medium- and high-density residential development within ¼ mile of transit stations, major transit corridors, employment centers, and downtown areas; and development and redevelopment in designated areas that are or could be well served by existing or planned transit.

[51] LCDC toured this area and other developed nodal development and transit-served areas at a past Commission meeting in Springfield.
[52] City File Nos. LRP2005-00001, LRP2006-00010 RiverBend Master Plan
[53] Meeting Notes from June 22, 2011 LCDC meeting.
[54] 2030 Plan Record Index Supplemental Record Files: Transportation

Existing acknowledged comprehensive plan policies, plan designations, zoning and Springfield Development Code and proposed 2030 Plan UGB, policies, plan designations, zoning and Springfield Development Code direct and regulate new residential, employment and mixed-use land uses to support achievement of transit-supportive land use patterns and development, including higher intensity, transit-oriented development along major transit corridors and near transit stations; medium- and high-density residential development within ¼ mile of transit stations, major transit corridors, employment centers, and downtown areas; and development and redevelopment in designated areas that are or could be well served by existing or planned transit.

OAR 660-024-0045 Implementation of the Transportation System Plan

(1) *"Each local government shall amend its land use regulations to implement the TSP."*

(2) "*Local governments shall adopt land use or subdivision ordinance regulations, consistent with applicable federal and state requirements, to protect transportation facilities, corridors and sites for their identified functions. Such regulations shall include:*

(a) Access control measures, for example, driveway and public road spacing, median control and signal spacing standards, which are consistent with the functional classification of roads and consistent with limiting development on rural lands to rural uses and densities;

(b) Standards to protect future operation of roads, transitways and major transit corridors;

(c) Measures to protect public use airports by controlling land uses within airport noise corridors and imaginary surfaces, and by limiting physical hazards to air navigation;

(d) A process for coordinated review of future land use decisions affecting transportation facilities, corridors or sites;

(e) A process to apply conditions to development proposals in order to minimize impacts and protect transportation facilities, corridors or sites;

(f) Regulations to provide notice to public agencies providing transportation facilities and services, MPOs, and ODOT of:

(A) Land use applications that require public hearings;

(B) Subdivision and partition applications;

(C) Other applications which affect private access to roads; and

(D) Other applications within airport noise corridors and imaginary surfaces which affect airport operations; and

(g) Regulations assuring that amendments to land use designations, densities, and design standards are consistent with the functions, capacities and performance standards of facilities identified in the TSP."

(3) "Local governments shall adopt land use or subdivision regulations for urban areas and rural communities as set forth below. The purposes of this section are to provide for safe and convenient pedestrian, bicycle and vehicular circulation consistent with access management standards and the function of affected streets, to ensure that new development provides on-site streets and accessways that provide reasonably direct routes for pedestrian and bicycle travel in areas where pedestrian and bicycle travel is likely if connections are provided, and which avoids wherever possible levels of automobile traffic which might interfere with or discourage pedestrian or bicycle travel."

(4) To support transit in urban areas containing a population greater than 25,000, where the area is already served by a public transit system or where a determination has been made that a public transit system is feasible, local governments shall adopt land use and subdivision regulations as provided in (a)–(g) below…"

Springfield has land use regulations in place consistent with applicable federal and state requirements and laws, to protect transportation facilities, corridors and sites for their identified functions, including measures and land use development review procedures addressing the standards listed in OAR 660-012-0045(2)(a)-(g). In 2016-17 Springfield is conducting several projects that will update the Springfield Development Code and Engineering Design Standards Manual to enhance compliance with OAR 660-012-0045. The TSP Implementation project updates development code and engineering design manual standards city-wide. TSP Appendix I "Plan Implementation and Recommended Ordinance/Code Language" outlines recommended code updates to implement the TSP.[55] While the existing SDC meets TPR standards, the TSP project will implement the updated policies found in TSP Chapter 2. The Downtown District Design Standards project updates standards applicable to land within the Downtown Refinement Plan. The Main Street Corridor Plan Phase Two project will create an innovative zoning code for the Main Street Corridor. [56] Both projects address "safe and convenient" pedestrian and bicycle facility routes, facilities and improvements, bicycle and vehicular parking requirements and facilities, alleys, accessways, curb extensions, pedestrian crossings, facility designs to support transit use, and development standards listed in OAR 660-012-0045(4) and (5). The SDC (city-wide) allows provision of on-street parking and shared parking to meet minimum off-street parking requirements. The City's acknowledged Glenwood Plan District code implements off-street parking maximums.

[55] The recommended updates would amend SDC Sections 4.2, 4.6, and 3.2 (panhandle lots), Appendix I. p. 3-4.
[56] This project was selected by TGM for funding but in 2016 the project is on hold as the City, ODOT and Lane Transit District consider Main Street Safety and transit system improvements in the corridor.

Springfield has land use regulations in place consistent with applicable federal and state requirements and laws, to protect transportation facilities, corridors and sites for their identified functions, including measures and land use development review procedures addressing the standards listed in OAR 660-012-0045(2)(a)-(g).

Springfield adopted new land use regulations that protect transportation facilities for their identified functions. The 2030 Plan designates and zones the lands added to the UGB to meet long range employment needs Urban Holding Area- Employment. The 2030 Plan applies 2030 Urbanization Element (Ordinance Exhibit C-2) policies requiring TSP and PFSP amendments prior to approval of rezoning for urban use as explained in Urbanization Element Table 5: pre-Development Approval Process Steps – Urban Holding Areas and Policies 38 and 39. The City and Lane County adopted and applied the AG-Urban Holding Area Zoning District (Ordinance Exhibits A, E) establishing land use regulations in SDC 3.2-915(A)(4) which states: ***"Proposed new uses or expansions of existing uses must demonstrate that the use will not generate vehicle trips exceeding pre-development levels."*** AG zone SDC 3.2-930, Table 1. Pre-Development Approval Process Steps – Urban Holding Areas Table 1 provides an overview of the planning procedures required prior to rezoning land from Agriculture - Urban Holding Area (AG) to urban employment zoning designations (e.g. Employment, Employment Mixed Use, Campus Industrial, or Industrial), including the following two steps:

Table 1. Pre-Development Approval Process Steps – Urban Holding Areas	
City-initiated Planning Process	**Owner-initiated Planning Process**
1. City prepares Plan Amendment to address all applicable Statewide Planning Goals (e.g. amended or new refinement plan or district plan), Metro Plan and Springfield Comprehensive Plan policies and Springfield Development Code standards.	1. Applicant submits request to City to initiate amendments to the Transportation System Plan and Public Facilities and Services Plan, and other city actions that may be required prior to plan amendment approval.
2. City and Lane County approve Plan Amendment to amend Metro Plan and Springfield Comprehensive Plan. UHA-E designation is replaced with employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, or Industrial). AG zoning remains in effect until Master Plan and new zoning are approved.	2. Applicant prepares and submits Plan Amendment application to address all applicable Statewide Planning Goals, Metro Plan and Springfield Comprehensive Plan policies, and Springfield Development Code standards. Applicant proposes employment plan designations (e.g. Employment, Employment Mixed Use, Campus Industrial, or Industrial).

Conclusions: OAR 660-12-0045. The 2030 Plan amendments and Springfield's existing Development Code provide land use regulations consistent with applicable federal and state requirements and laws, to protect transportation facilities, corridors and sites for their identified functions, including measures and land use development review procedures addressing the standards listed in OAR 660-012-0045(2)(a)-(g).

OAR 660-012-0060 Plan and Land Use Regulation Amendments

OAR 660-024-0020 (1)(d) states:

> *"The transportation planning rule requirements under OAR 660-012-0060 need not be applied to a UGB amendment if the land added to the UGB is zoned as urbanizable land, either by retaining the zoning that was assigned prior to inclusion in the boundary or by assigning interim zoning that does not allow development that would generate more vehicle trips than development allowed by the zoning assigned prior to inclusion in the boundary;*

Conclusions OAR 660-012-0060. The City and Lane County assigned the "Urban Holding Area – Employment (UHA-E)" comprehensive plan designation and "Agriculture – Urban Holding Area (AG)" interim zoning to the urbanizable employment lands added to the UGB in the City's 2030 Plan amendments. The zoning does not allow development that would generate more vehicle trips than development permitted under the existing Lane County Agriculture zoning assigned prior to the inclusion of the lands in the UGB.

The UHA-E designation and AG zone establish an urban transition land use district that restricts interim uses to those already permitted under the existing Lane County Exclusive Farm Use (EFU) zoning. As permitted under OAR 660-024-0020 (1)(d), the OAR 660-012-0060 requirement to conduct a transportation impact analysis can be deferred until the analysis is needed to evaluate a proposed plan or zoning amendment that will allow urban development.

The subject 2030 Plan amendments do not trigger the transportation planning rule requirements under OAR 660-012-0060.

Adoption of the 2030 Plan UGB amendment triggers a need to update the Springfield Transportation System Plan prior to approval of plan designation or zoning amendments and annexation to allow urban development in the UHAs. Exhibit E SDC AG zone describes the required sequencing of these post-acknowledgement plan amendments prior to approval of any land use proposal that creates significant impacts above levels assumed by acknowledged Transportation Systems Plans.

Compliance with Section 60 of the TPR for lands inside the previously-acknowledged Springfield UGB. The 2030 plan codifies and relies upon the acknowledged comprehensive plan designations, Metro Plan land use policies and TSP. Inside the current UGB, the 2030 Plan implements existing acknowledged comprehensive plan designations that were in place when the region's acknowledged transportation system plans and Springfield's local Transportation System Plan were adopted. Plan and zoning map designations interpreting and implementing those designations do not cause "significant impacts" within the meaning of the rule.

LUBA has determined that plan and zoning amendments do not have significant impacts under Section 60 to the extent that those amendments were in place and therefore necessarily assumed by acknowledged Transportation Systems Plans. The leading case on this issue is Mason v. City of Corvallis, 49 Or LUBA 199 (2005). In Mason, the subject decision rezoned land from low-density rural to urban

low-density-residential (LDR) densities allowed under a city comprehensive plan designation that had been assumed in the city's acknowledged TSP.

Elements of the 2030 Plan that reflect, interpret, or implement comprehensive plan designations and other land use measures assumed by TransPlan/TSP do not have significant impacts within the meaning of Section 60 of the TPR.

The same is true of elements of the 2030 Plan that incorporate or otherwise reflect other post-acknowledgment plan or zoning amendment decisions that have become final and no longer subject to appeal. Those decisions are deemed "acknowledged" by operation of law and are presumed to have been made in full compliance with the LCDC's transportation goal and interpretive rule. See Friends of Neabeack Hill v. City of Philomath, 139 Or App 39, 911 P2d 350, rev. den. 323 Or 136(1996). Examples reflected in the draft 2030 Plan include post-acknowledgment amendments relating to RiverBend, the Sports Complex, Gateway Refinement Plan, Downtown Refinement Plan, and Glenwood Refinement Plan.

The 2030 Plan supports implementation of the TSP and Metro Plan Transportation Element policies addressing the following goals:

1. *"Provide an integrated transportation and land use system that supports choices in modes of travel and development patterns that will reduce reliance on the automobile and enhance livability, economic opportunity, and the quality of life."*

2. *"Enhance the Eugene-Springfield metropolitan area's quality of life and economic opportunity by providing a transportation system that is:*
   - *Balanced,*
   - *Accessible,*
   - *Efficient,*
   - *Safe,*
   - *Interconnected,*
   - *Environmentally responsible,*
   - *Supportive of responsible and sustainable development,*
   - *Responsive to community needs and neighborhood impacts, and*
   - *Economically viable and financially stable."*

As one strategy to achieve these goals, the Metro Plan policies in the Transportation Element address land use as follows:

> *"The Oregon Transportation Planning Rule (TPR) [OAR 660-012-0060(1)(c) and (d) and (5)] encourages plans to provide for mixed-use, pedestrian-friendly development, based on information that documents the benefits of such development and the Land Conservation and Development Commission's (LCDC) policy interest in encouraging such development to reduce reliance on the automobile. The rule [OAR 660-012-0045(4)(a)*

and (e)] requires local governments to adopt land use regulations that allow transit-oriented developments on lands along transit routes and require major developments to provide either a transit stop on site or connection to a transit stop when the transit operator requires such an improvement. The rule [OAR 660-012-0045(3)] also requires local governments to adopt land use regulations that provide for safe and convenient pedestrian and bicycle access within new developments and from these developments to adjacent residential areas and transit stops and to neighborhood activity centers."

The acknowledged TSP establishes Springfield's local transportation system plan consistent with the policy direction of Policy 1B of the OHP to coordinate land use and transportation decisions to efficiently use public infrastructure investments to:

- *Maintain the mobility and safety of the highway system;*
- *Foster compact development patterns in communities;*
- *Encourage the availability and use of transportation alternatives; and*
- *Enhance livability and economic competitiveness.*

<u>2030 Plan supports implementation of *TransPlan*/Metro Plan Transportation Element/TSP strategies to reduce reliance on single occupancy vehicles.</u> Springfield previously designated and zoned lands to support implementation of the regional principles, goals, policies and strategies of the adopted Metro Plan Transportation Element intended to support achievement of compact urban growth, increase residential densities, and encourage mixed-use developments in designated areas. Springfield previously designated lands "Nodal Development;" established Mixed-Use zoning districts and a Nodal Overlay District in the Springfield Development Code; applied Mixed-use zoning and a Nodal Development Overlay District; and designated one of the first Multi-modal Mixed Use Areas (MMA) [57]Areas in the state (Glenwood).

The subject Springfield 2030 Comprehensive Plan policies (and the previously acknowledged 2030 Residential Land Use and Housing Element policies and implementation measures) support implementation of nodal development as one land use strategy intended to increase use of alternative modes of transportation and increased opportunities for people to live near their jobs and to make shorter trips for a variety of purposes. The CIBL/EOA allocates employment growth to nodal areas as shown in the applicable adopted Springfield refinement plans and master plans. The City's subject 2030 Plan amendments implement existing acknowledged comprehensive plan designations and zoning map designations interpreting and implementing those designations that were in place when the Springfield Transportation System Plan was adopted. The 2030 Plan Economic Element and Urbanization Element policies in Ordinance Exhibits B and C provide clear city-specific land use policy direction coordinated with Springfield TSP policies, projects and programs to support implementation of land use and transportation planning measures that are intended to:

[57] As defined in OAR 660-012-0060(10)(B)(b)(A),(B), (C),(D) and (E).

- Maintain the mobility and safety of the highway system;
- Continue to foster compact development patterns in Springfield;
- Continue to encourage the availability and use of transportation alternatives by allocating 2030 employment growth to areas with existing or planned public transit service; and
- Enhance Springfield's livability and economic competitiveness.

The Metro Plan Transportation Element noted the challenge of changing long-established land use patterns to encourage availability and use of transportation alternatives":

> *"The Market Demand Study for Nodal Development (ECONorthwest and Leland Consulting Group, 1996) recommended that the public strategy for nodal development should be flexible and opportunistic and include use of financial incentives, targeted infrastructure investments, public-private partnerships, and an inviting administrative atmosphere."* [58]
>
> *"During the public review of the nodal development strategy, many comments were received that identified the need for incentives for developers, builders, property owners, and neighborhoods to ensure that nodal developments would be built consistent with design guidelines. The type of support and incentives suggested ranged from public investments in infrastructure to technical assistance and economic incentives."*[59]

As described in the City's findings under Goal 9, the 2030 Plan Economic Element policies identify Springfield's public strategy for supporting redevelopment of higher density, transit-oriented mixed-use development as a key element in the city's overall economic development strategy. Springfield provides information, technical assistance, financing incentives and infrastructure support for nodal development primarily through the Springfield Economic Development Agency's (SEDA) administration of the Glenwood and Downtown urban renewal districts. [Metro Plan Transportation Element Policy F.2, F.3]

As described in the TSP, Springfield coordinates with the MPO and partners with Lane Transit District and Springfield School District 19 to implement demand management programs (Point-to Point Solutions, Smart Trips Program, Safe Route to Schools).

<u>Downtown Parking Management Plan to support Downtown redevelopment.</u> Springfield's Downtown District is exempt from parking requirements. The Downtown Parking Management Plan[60] was adopted in 2010. Section VII of the Plan presents Springfield's strategies for regulating parking efficiently to support safe and positive customer experience to support Downtown commerce and to help Springfield attract a more diverse mix of retail, office and residential uses. The City is currently implementing the strategies and is considering parking management program options to incentivize redevelopment in Glenwood.

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[58] Metro Plan p.III–F-4
[59] Ibid.
[60] Springfield Downtown Urban Design Plan – Parking Management, Rick Williams consulting, July 2010.

2030 Plan policies support compact urban design to reduce traffic impact on state highways. The Oregon Highway Plan recognizes that access management strategies can be implemented to reduce trips and impacts to major transportation facilities, such as freeway interchanges, and that communities with compact urban designs that incorporate a transportation network of arterials and collectors will reduce traffic impacts on state highways, postponing the need for investments in capacity-increasing projects.

The 2030 Plan policies support employment growth in centers and corridors accessible by transit, walking and bicycling. Metro Plan Transportation Element p. III-F-9 states:

> *"Transit services are particularly important to the transportation disadvantaged population: persons who are limited in meeting their travel needs because of age, income, location, physical or mental disability, or other reasons. The Americans with Disabilities Act (ADA) requires fixed-route systems like Lane Transit District's (LTD) to provide a comparable level of service to the elderly and persons with disabilities who are unable to successfully use the local bus service. LTD's Americans with Disabilities Act Paratransit Plan, 1994-1995 Update (January 18, 1995) was found to be in full compliance with the ADA by the Federal Transit Administration."*

Metro Plan Transportation Element Policy F.18 states:

> *"Improve transit service and facilities to increase the system's accessibility, attractiveness, and convenience for all users, including the transportation disadvantaged population."*

Metro Plan Transportation Element Policy F.19 states:

> *"Establish a BRT system composed of frequent, fast transit service along major corridors and neighborhood feeder service that connects with the corridor service and with activity centers, if the system is shown to increase transit mode split along BRT corridors, if local governments demonstrate support, and if financing for the system is feasible."*

Metro Plan Transportation Element Policy F.20 states:

> *"Implement traffic management strategies and other actions, where appropriate and practical, that give priority to transit and other high occupancy vehicles."*

Metro Plan Transportation Element Policy F.22 states:

> *"Construct and improve the region's bikeway system and provide bicycle system support facilities for both new development and redevelopment/expansion."*

Metro Plan Transportation Element Policy F.23 states:

> *"Require bikeways along new and reconstructed arterial and major collector streets."*

Metro Plan Transportation Element Policy F.24 states:

> *"Require bikeways to connect new development with nearby neighborhood activity centers and major destinations."*

Metro Plan Transportation Element Policy F.26 states:

> *"Provide for a pedestrian environment that is well integrated with adjacent land uses and is designed to enhance the safety, comfort, and convenience of walking."*

Metro Plan Transportation Element Policy F.27 states:

> *"Provide for a continuous pedestrian network with reasonably direct travel routes between destination points."*

Metro Plan Transportation Element Policy F.28 states:

> *"Construct sidewalks along urban area arterial and collector roadways, except freeways."*

Goal 12 Conclusion. Based on the findings and conclusions stated, the City's 2030 Plan amendments are consistent with Goal 12, and the relevant policies of the Metro Plan.

Statewide Planning Goal 13: Energy Conservation

OAR 660-015-0000(13)
To conserve energy.

"Land and uses developed on the land shall be managed and controlled so as to maximize the conservation of all forms of energy, based upon sound economic principles."

Metro Plan IIIJ Energy Element addresses Goal 13. The 2030 Plan amendments so not affect compliance with Goal 13 or Metro Plan IIIJ Energy Element. 2030 Plan policies support and encourage use of energy efficient buildings, energy efficient transportation systems and modes, recycling and re-use of previously land and buildings, and increasing employment capacity in higher density mixed-use multi-modal centers and corridors.

The Goal 14 boundary alternatives analysis requires cities to consider and balance energy consequences as one of the four Goal 14 ESEE locational factors in comparing different sites for potential urbanization.

To implement Goal 13, the Springfield Development Code addresses lot size, dimension, and siting controls; building height and bulk; density of uses; availability of light, wind and air; compatibility of and competition between competing land use activities; and provisions for collection of waste.

Goal 13 conclusion. The 2030 Plan amendments are consistent with Goal 13, as implemented through the policies in Metro Plan IIIJ Energy Element and the 2030 Plan policies.

Ordinance No. 6361, Exhibit F-1

Supplemental Findings

The supplemental findings are attached to Exhibit F to address testimony submitted and issues raised during the final evidentiary hearing process and to provide cross references to pertinent pages that address those same issues within Exhibit F.

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Exhibit F – 1 Supplemental Findings

The supplemental findings are attached to Exhibit F to address testimony submitted and issues raised during the final evidentiary hearing process and to provide cross references to pertinent pages that address those same issues within Exhibit F or other items in the record. Copies of the written testimony submitted were provided in the November 7, 2016 Agenda Item Summary Attachment 3 and at the November 7, 2016 meeting. The City's responses to each of these items were provided in November 7, 2016 Agenda Item Summary Attachment 1, pp. 1-79, and in the staff report oral presentation as documented in the Minutes of the November 7, 2016 Joint Meeting of the City Council and Lane County Board of Commissioners.

The recent testimony received in response to the proposed 2030 Plan amendments is predominantly directed to the CIBL/EOA land need determination and the UGB amendment boundary location, not to the associated policy changes in Exhibits B-1, C-1, D, E. To summarize, those who provided the recent testimony can be sorted into four groupings:

Group 1. Those not included in the proposed UGB who wish to be included in the UGB assert that the City's proposed boundary amendment brings in the wrong lands. (Kloos/Terrell/Johnson Crushers/Willamette Water Company). City violated ORS 197.298. City should stop what it's doing and start over with CIBL/EOA process, City should reconsider Goshen.

Group 2. Those who assert that the City erred by not counting certain developed parcels or small parcels within the existing UGB as available inventory to meet 2010-2030 land needs. (1000 Friends)

Group 3. Those in favor of being included. (North Gateway property owners)

Group 4. Those opposed to being included (Mill Race property owners), concerned about how changes in land use will affect them personally and how infrastructure upgrades will occur.

A. Response to concerns about the CIBL inventory and employment land need determination — submitted by 1000 Friends and others

Since prior to the first evidentiary hearing on the commercial and industrial lands inventory and economic opportunities analysis (2010) Springfield staff have provided ample opportunities for 1000 Friends representatives, including Mia Nelson, to review documents and provide input into the process. Throughout the process, City staff met with Ms. Nelson upon request, and responded to phone calls and emails requesting data and information about sites and the CIBL/EOA. In addition to the September 12, 2016 letter, submitted at the hearing, the record includes memoranda submitted by 1000 Friends (Mia Nelson and her predecessor Sid Friedman) and corresponding memoranda from the City in response to the earlier 2008 and 2009 drafts of the CIBL/EOA. The City has responded to concerns previously raised by 1000 Friends and others and the Final CIBL/EOA 2015 reflects significant changes to the land need

determination — resulting in a reduction of land needed in the UGB expansion from 640 to 223 acres of suitable employment land.

Mia Nelson, representing 1000 Friends of Oregon (1000 Friends) presented oral testimony at the September 12, 2016 hearing and submitted written testimony (letter dated September 12, 2016 and attachments) at the hearing. Ms. Nelson stated that she is not able to support the proposal completely. because it is her opinion that the City has a lot of vacant and underutilized land and extending infrastructure to any of the areas outside the UGB is expensive. In her written testimony she raised three issues, all related to the need for employment sites as identified in the City's CIBL/EOA and the City's policy response to those needs. 1000 Friends agrees about the number of large sites Springfield needs. 1000 Friends disagrees with the some of the data used in the CIBL/EOA and with some of the City's policy choices. Ms. Nelson disagrees with the City's land need determination and asserts that the City's inventory did not properly assess or quantify sites or portions of sites within the UGB, and thus more land should be assumed available to meet Springfield's identified employment land needs via redevelopment on such lands, reducing the number of sites and overall amount of land needed in the UGB expansion.

In summary, 1000 Friends asserts:

1. *CIBL/EOA assumes excessive size requirements for needed sites in the 20 acres and larger category;*
2. *City failed to re-designate surplus industrial sites to meet its commercial deficit/large commercial and industrial sites are interchangeable.*
3. *City failed to inventory all existing 20+ acre sites.*

In her letter, Ms. Nelson posed questions about how specific sites inside the UGB were classified in the analysis, and submitted attachments that identify sites 1000 Friends thinks should be counted as inventory to meet Springfield's identified employment land needs.

<u>The documents submitted into the record by 1000 Friends to describe specific sites inside the UGB is not contemporary with the City's inventory data, thus the data submitted is irrelevant to the inventory.</u> The City examined the testimony and documents submitted by 1000 Friends and found the arguments and interpretations made to be flawed. The list of sites in the 1000 Friends letter and (and attachments labelled 1-14) depict maps and parcel size information about existing developed Springfield sites, with parcel lines, site development and improvements as they are described by data accessible in 2016. It is important to note that information submitted by 1000 Friends in 2016 is more recent information than the data used in the City's analysis. The CIBL/EOA reflects the parcel lines and improvement values as of July 2008 for the purposes of the 2010-2030 planning period of the 2030 Comprehensive Plan. Thus Ms. Nelson's testimony sets up an apples-to-oranges comparison of some parcels or tax lots as they existed

in the 2008 inventory vs. conditions as they may exist today. The altered[1] tax lot maps and air photos placed into the record by 1000 Friends creates potential to confuse decision makers because development, land divisions and property owner transfers have occurred since July 2008. City staff considered the information submitted and provided correct information from the CIBL database to address sites identified in the 1000 Friends letter and attachments. (November 7, 2016 Agenda Item Summary ATT1, Exhibit A-3; Supplemental Record file: CIBL Inventory) This information was shared with Ms. Nelson at a meeting with staff Pauly on October 6, 2016. Ms. Nelson was also given a digital copy of the CIBL database, along with information to help her read the data fields in the MS Access file.

OAR 660-009-0010(5) allows an EOA to be based on information available or collectible at the time of preparation of the analysis, and none the information submitted by 1000 Friends indicates that it is unreasonable for the City to continue to rely on the CIBL/EOA inventory and analysis. In fact, the City finds that the aerial photos Ms. Nelson submitted in her attachments actually help tell the critical story about Springfield's deficient employment land supply — Springfield lacks suitable large sites to accommodate its target industry employers in the 2010-2030 planning period. If Ms. Nelson and 1000 Friends were successful in convincing the local officials or others on appeal that some or all of the sites depicted in her attachment should/must be assumed as the City's land inventory of sites available to accommodate desired jobs and employment growth for the 2010-2030 planning period, the City would not be able to meet its objectives of growing and diversifying the local, regional and state economy. That outcome would be contrary to the intent of Goal 9.

The following supplemental findings demonstrate that the City has considered the issues raised by 1000 Friends and explain the City's response to those concerns. 1000 Friends agrees with the number of large sites Springfield needs, but disagrees with the assumptions and policy choices used in the City's CIBL/EOA inventory work, the results of applying those assumptions to determine Springfield's employment land needs, and the City's land use policy choices in response to those needs. It is the City's position that the methodologies applied, the assumptions used and policy choices made in the CIBL/EOA are consistent with the applicable Oregon Statutes and Administrative Rules and are based on substantial evidence as explained in the CIBL/EOA and in the City's relevant findings under Goal 9 and 14.[2] The CIBL/EOA explains how tax lots were classified in the CIBL inventory and how lots classified "vacant" and potentially redevelopable" were evaluated based on substantial evidence, citizen involvement and the professional expertise of the City's consultant ECONorthwest. The City therefore continues to rely on the comprehensive and expert CIBL/EOA in support of its decision.

OAR 660-009-0015(3)(b) Inventory of Industrial and Other Employment Lands
OAR 660-009-0005(3) Industrial Use
OAR 660-009-0005(13) Total Land Supply

[1] The 1000 Friends attachments include annotations drawn over air photos and tax lot maps to depict hypothetical "sites."

[2] See Exhibit F Findings under OAR 660-009-0020(1) Policy commitment to designate adequate sites and facilities, page 67-78 for Springfield's policy commitments to enable and foster redevelopment.

OAR 660-009-0020(1) (b), (c) Industrial and Other Employment Development Policies

OAR 660-009-0015(3)(b)

> *"When comparing current land supply to the projected demand, cities and counties may inventory contiguous lots or parcels together that are within a discrete plan" or zoning district."* (emphasis added)

This provision of the Goal clearly states that the City may inventory contiguous lots or parcels together that are within a discrete plan or zoning district, but the City is not required to do so. The City has the discretion to choose.

Adjacent contiguous tax lots or portions of tax lots that were being used in conjunction with the primary use of the site (public and private utilities and infrastructure, outdoor materials and equipment storage, storage, log yards and decks, ponds, etc. for paper and lumber mills, wood products manufacturing, freight service and agricultural use) were inventoried together, assumed to be needed for the operations of the primary use and thus were not assumed as available inventory to meet Springfield's identified land needs. The City's analysis of contiguous tax lots and employment sites within a plan or zoning district is consistent with OAR 660-009-0015(3)(b).

OAR 660-009-0005 (3)

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

OAR 660-009-0005(6)

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

OAR 660-009-0005 (13) states:

"Total Land Supply" means the supply of land estimated to be adequate to accommodate industrial and other employment uses for a 20-year planning period. Total land supply includes the short-term supply of land as well as the remaining supply of lands considered suitable and serviceable for the industrial or other employment uses identified in a comprehensive plan. Total land supply includes both vacant and developed land.

OAR 660-009-0020 (1)(b)

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

A common theme runs through the three issues addressed in Ms. Nelson's testimony dated September 12, 2016 — the use of industrial land in Springfield (as classified in the City's 2008 CIBL inventory, as currently used in 2016 and how such land, tax lots, or portions thereof could/should be used in the future). Thus the City's Supplemental Findings address three interrelated issues raised by 1000 Friends to explain their relationship, as well as the relationship of these issues with concerns previously raised by Ms. Nelson and 1000 Friends in response to earlier iterations of the CIBL/EOA in the 2030 planning process.

The sites identified by 1000 Friends are needed to accommodate heavy industrial uses for which they are currently and appropriately planned, zoned and developed. The City is required to maintain a short-term supply of land that provides a range of site sizes and locations to accommodate the market needs of a variety of industrial and other employment uses. The City does not have substantial evidence to support adoption of a public policy — Springfield's employment land base— that relies on 1) an assumption that all of these sites are likely to be redeveloped during the 2010-2030 planning period; and 2) a proposal by the City to redesignate these sites for non-industrial uses. It is common knowledge in the land use planning field that industrial land is in short supply. Market pressures to convert industrial land to other uses is strong and will only increase as Springfield and other Oregon cities keep their UGBs as compact as possible. These heavy industrial uses and sites are not quite as "interchangeable" as 1000 Friends appears to suggest. It is easy to assert that such sites or portions of sites can be re-zoned or up-zoned to allow new or different uses on existing industrial sites and land uses instead of expanding the UGB to provide suitable land with the required characteristics of needed sites. But such assertions are backed by no evidence to demonstrate that such lands can or are likely to be redeveloped to meet Springfield's identified site needs within the planning period. For the reasons that follow, there is no basis to assume that Springfield can entirely meet its identified employment needs on such sites.

Contrary to Ms. Nelson's assertions, Springfield's inventory and analysis of its existing employment land base was rigorous and left no stone unturned. Before expanding the UGB, the City examined the

capacity of land within the existing UGB to accommodate employment growth, including sites where it is reasonable to assume that increased employment capacity on a site would occur within the planning period through redevelopment.

The 2030 Plan analysis and policies support accommodation of all needed employment growth requiring sites smaller than 5 acres within the existing UGB.

Springfield's Redevelopment Analysis. Before expanding the UGB to provide needed employment sites 5 acres and larger, the City identified and evaluated potentially redevelopable land in sites 5 acres and larger land within the existing UGB to accommodate employment growth through redevelopment. (CIBL/EOA pp. 27-38). The City's CIBL/EOA includes a Redevelopment Analysis. In that analysis, ECONorthwest applied a rigorous and reasonable evaluation of redevelopment potential. The City's database, prepared by ECONorthwest, classified tax lots as "redevelopable" (CIBL/EOA p. 32 Map 2-6: Potentially Redevelopable Commercial and Industrial Land City of Springfield). "Potentially redevelopable" sites were identified, examined and evaluated for their likelihood to provide suitable sites to meet identified land needs in the 2010-2030 planning period. The City's analysis concluded that 22% of needed jobs will locate on lands classified as "potentially redevelopable." The City's CIBL/EOA clearly explains the methodology and criteria ECO used to classify sites in the study and how "potentially redevelopable" sites were identified for the purpose of the study. (CIBL/EOA pp. 27-38).

CIBL/EOA Table 2-12 provides explanation for each "Potentially Redevelopable" site 5 acres and larger. As allowed under OAR 660-009-0015(3)(b), adjacent tax lots or portions of tax lots that were being used in conjunction with the primary use of the site (outdoor storage, log yards, ponds, etc.) were inventoried together, were assumed to be needed for the operations of the primary use, and thus were not assumed as available inventory to meet Springfield's identified land needs. Examples of this instance are on page 36 tax lot 1702320000100 (paper mill), tax lot 18021000000900 (wood products manufacturing), page 37 1702280000500 (agricultural uses), 1702332101219 (mini storage), 1702311200100 (lumber yard), and page 38 1702300001910 (freight service business).

Only land that is "likely to be redeveloped during the planning period" is required to be considered as available land to meet the City's identified site needs, pursuant to OAR 660-009-0005(1) which addresses "non-vacant land that is likely to be redeveloped during the planning period" as a category of "Developed Land" (emphasis added):

> *"not all redevelopment is relevant to a buildable land inventory; only redevelopment that adds capacity for more employment is relevant in the context of Springfield's commercial and industrial buildable lands inventory."*
>
> *"Redevelopment is development that occurs on a tax lot that creates more employment space or capacity that the current use, and thus an increase in density on the tax lot."*[3]

[3] Statement by ECONorthwest, CIBL/EOA, p. 27.

In the CIBL/EOA pages 27-31, the study author explains how "redevelopment potential can be thought of as a continuum – from more redevelopment potential to less redevelopment potential." The author explains how ECONorthwest (ECO) made the determination of lands with redevelopment potential using data (improvement to land values) as a gross indicator, by analyzing the resultant data, by applying sound rationale and professional judgement. ECO sought local input and policy direction from the City Council to discern which assumptions and policy choices within "a continuum – from more redevelopment potential to less redevelopment potential" to apply to the study. ECO then applied those results to the inventory process and found only one tax lot over 20 acres with redevelopment potential (Table 2-11, page 31, which does not deduct constraints). ECO then looked at all potentially redevelopable sites from Table 2-11 that were 5 acres and larger (page 33) and provided results in Table 2-12 and, with input from city staff, made a determination of which sites can be considered likely to be redeveloped during the planning period.

One "Potentially Redevelopable" site larger than 20 acres was assumed as available inventory to meet identified needs in the 20-acre and larger size category (CIBL/EOA page 33), a site in the Jasper Natron area with multiple constraints on it that has been planned and zoned for Special Heavy Industrial use since the 1980's. The 2030 Plan amendments address this site, as explained in the City's Findings Exhibit F, page 69-72. Six "Potentially Redevelopable" sites in the 5-20 acre category were assumed as available inventory to meet identified needs, as addressed in the City's Findings Exhibit F, page 72. See additional findings under section B below. The City's analysis assumes all need for sites smaller than 5 acre will be met within the existing UGB.

While Ms. Nelson may disagree with the results of applying the assumptions and policy choices used in the CIBL inventory work, the assumptions used and policy choices made are consistent with the applicable Oregon Administrative Rules and are based on substantial evidence as explained in the CIBL/EOA.

<u>1000 Friends Issue 1. CIBL/EOA Table 5-2 Average size of needed sites in the 20 acre and larger category.</u> 1000 Friends takes issue with the average size of needed industrial and commercial and mixed use sites assumed for needed sites in the 20-acre and larger size category. The other site size averages in Table 5-1 (5-20 acres, 2-5 acres, 1-2 acres, less than 1 acre) are not challenged. The average site sizes in Table 5-1 are based on empirical analysis of the size of Industrial and Commercial tax lots with employment in Springfield in 2006. This analysis involved relating covered employment data to tax lots in Springfield.[4] Ms. Nelson asserts that the City erred when it relied on historic site size data and confidential Quarterly Census of Employment and Wages (QCEW) covered employment data to determine the average size of needed industrial and commercial mixed use sites larger than 20 acres.

This assertion is contrary to testimony by Ms. Nelson in response to the 2009 Draft CIBL/EOA. In her letter addressed to Mayor Leiken and the Springfield City Council, dated January 19, 2010, she requested that the city abandon the more aspirational land need in the 2009 draft CIBL/EOA and stick to the *"historic pattern"* of site needs shown in 2009 Draft CIBL/EOA Table C-10. She repeated that same

[4] CIBL/EOA p. 78.

request in her letter to the Springfield and Lane County Planning Commissions dated March 14, 2010 (p. 6), commenting on the 2009 Draft CIBL/EOA, which identified a need for a 640-acre UGB expansion:

> *"Table C-10 on page 141 of the EOA identifies the number of needed sites by size based on historic employment patterns. The final line, however, presents a range of needed sites that is far greater than the number of sites based on historic development patterns, both for every specific site size and in aggregate.; and*
>
> *"We request that the EOA be revised to assume no greater land need than the historic pattern shown in Table C-10."*

In consideration of the 2010 and other earlier testimony submitted by 1000 Friends and others, the City revised the CIBL/EOA, and in doing so, relied on substantial evidence about local historic development patterns. In the Executive Summary (page i-ii) of the CIBL/EOA Final Report, August 15, 2015, the author explains the revisions made to address feedback received on the 2009 Draft and to respond to recent legal cases. Primary changes to the document listed include:

> *"Revision to the number of needed sites, removing the range of needed sites and <u>using historical data to identify the number and size of needed sites.</u>"* (emphasis added)
>
> *"Revision to the categories of needed site size, to combine the largest site sizes into one category: sites 20 acres and larger."*

The revisions to the CIBL/EOA adjusted Springfield's overall employment land need from 640 acres down to 223 acres.

Now, in her September 12, 2016 letter, Ms. Nelson asserts that by using "historic" site size data, the City is inappropriately basing future employment site needs on sites utilized by Springfield's "legacy" industries such as "existing paper and lumber mills" or warehouse and distribution uses, and that such uses are a far cry from Springfield's target industries and their respective site needs. On p. 3 of her letter Ms. Nelson states:

> *"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."*

There are several problems with Ms. Nelson's statement and 1000 Friends' assertion that the CIBL/EOA's average site size of sites larger than 20 acres is excessive. First, the City's policy objective is to provide suitable large sites for a range of industries to diversify the economy. The City's choice of average site size is supported by data in the CIBL/EOA about the need for large sites. Second,

Springfield's list of target industries,[5] includes such "legacy" – type industries, and that some of these will require large sites:

- food processing manufacturing
- wood products manufacturing
- furniture manufacturing
- recreational equipment manufacturing
- specialty foods processing
- green construction firms
- organic food processing
- sustainable logging and/or lumber products manufacturing
- alternative energy production

1000 Friends applies the same argument — that "legacy" industries and the size of site they need are passé — to their assessment of potentially redevelopable heavy industrial sites in Springfield. It seems that 1000 Friends expects Springfield's "legacy" industry businesses on sites 5 acres and smaller will all somehow disappear by 2030, or that industrial uses that require large sites will relocate elsewhere. The City's and region's economic development plans and policies support retention of existing businesses and growth of existing industrial clusters. This requires retention of existing industrial sites that are suitable for manufacturing and heavy industry.

Ms. Nelson first raised the issue of "legacy" industries in her January 19, 2010 testimony, p. 3:

> *"There are a number of "legacy" industries in Springfield, such as the struggling Weyerhaeuser paper factory and the Rosboro log yard. The mothballed Sony factory is another example…The future viability of Springfield's various industries has to be considered when assessing redevelopment potential."*

No one can accurately predict the future, but Goal 9 requires the City to adopt a land needs assessment and land use policies that are based on an analysis of data about *trends* to identify economic *opportunities.* Springfield's CIBL/EOA addresses economic opportunities to accommodate job growth and diversification of the economy.

The 2030 Plan designates land suitable to accommodate a more diverse range of employment uses than currently exist in the City's existing inventory of commercial, industrial and mixed use designated land. The 2030 Plan also maintains a supply of industrially designated and zoned land that is suitable to accommodate Springfield's so-called "legacy" industries as they exist today and as they are expected to operate and grow in the future. This is the portion of Springfield's land base that is assumed must be planned and zoned to accommodate existing jobs and forecast growth.

[5] Target industries are listed in CIBL/EOA p. iii-iv, Table S-1 and explained in CIBL/EOA Chapters, 3, 4 and 5. Springfield's economic development Objectives and Strategies are discussed in CIBL/EOA Appendix D.

While no one in 2008 may have predicted the substantial local industrial facility re-investments forthcoming in the so-called "*struggling Weyerhaeuser paper factory'*, (now International Paper), or in the complete re-build of the Swanson mill in recent years since the CIBL/EOA, the City's analysis did assume that changes in the wood products industry were underway and that the number of jobs in the industry were in decline. We also knew that the "*mothballed Sony factory"* had already been redeveloped to become Oregon Medical Labs, and that the medical and tech cluster in Springfield's Gateway/International Way area was growing.

Springfield's CIBL/EOA properly balances these more aspirational "target" land needs for specific types, sizes and locations of sites, with practical and reasonable assumptions about continuation of existing land uses and redevelopment opportunities within the existing UGB land supply. The 2030 land supply must be designated to provide sites suitable to accommodate "target industries" or the City and region will not be able to provide sites for those jobs the city aspires to. The CIBL/EOA includes ample assessment of redevelopment potential. Tax lots classified as "Potentially Redevelopable" in the CIBL inventory are reflected in CIBL/EOA Table 5-1. "Potentially Redevelopable" sites in each site size category are assumed to increase employment capacity on the redeveloped site. The assessment of redevelopment potential examined each "potentially redevelopable" site larger than 5 acres and, based on policy direction from the City Council in regard to assumptions and based on the professional judgment of ECONorthwest and local planning staff about each particular site, the City's analysis identified sites that are reasonably likely to provide redevelopment opportunities in the 2010-2030 planning period. 1000 Friends to substitute 1000 Friends speculative assessment for Springfield's 8 years of careful data analysis and local policy decisions.

The City's land base includes so-called "legacy" industrial sites. Unless classified otherwise in the 2008 inventory process, sites that were developed with heavy industrial uses were assumed to be used for the operation of same or similar uses over the planning period. Springfield's 2030 Plan maintains the existing supply of industrial sites larger than 5 acres within the existing UGB to support continued operational needs of "legacy" industrial uses now and in the future.

1000 Friends seems to be suggesting that the City is required to or should rezone every heavy industrial site occupied by a use not in the City's list of "target industries." Ms. Nelson seems to be suggesting that the City's analysis must/should assume that those "legacy" use businesses and jobs will disappear and that every tax lot will be available for redevelopment for "target industries" within the 20-year plan horizon. The City disagrees and has received no substantial evidence to support such a claim. The local government's decision must be based on substantial evidence.

Springfield's CIBL/EOA properly balances reasonable assumptions about aspirational "target industry[6]" land needs for specific types, sizes and locations of sites based on 1) site needs data about "target industries;" and 2) average sizes of commercial and industrial sites in Springfield. Springfield's target industries have varied site needs. The CIBL/EOA land need determination is based on the City's assumptions and policy choices that are centered on accommodating the majority of employment

[6] Ibid.

growth needs within the existing UGB — partly through redevelopment of some sites inventoried in the CIBL, and in addition to meeting all of the residential growth needs that the City's 2011- acknowledged plan assumes will be 100% accommodated within the existing UGB.

The CIBL/EOA assumes that the commercial and industrial land base will continue to be needed to support employment use (as it existed at the time of the 2008 inventory) *and* to support a sizable portion of the 46% of employment growth that is assumed to not require vacant land[7]. Springfield's CIBL/EOA is based on reasonable but aggressive assumptions about redevelopment opportunities within the existing UGB land supply. Springfield's CIBL/EOA is based on substantial evidence, not speculation. The purpose of the UGB expansion is to provide employment land sites with characteristics that cannot be found within the existing UGB. 1000 Friends seems to imply that employers will find sites with the needed site characteristics within the existing UGB, but has not presented substantial evidence to explain that hypothesis.

1000 Friends asserts that the City erred by basing the average size of 20-acre and larger sites on "legacy" industry sites and one-off" developments, and in doing so, improperly inflated the site size for needed sites in the 20-acre and larger size category. Instead of the 63 and 60 acre average, 1000 Friends asserts:

> *"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."* (9-12-16 letter, top of p. 2)

CIBL/EOA Table 5-2 Average size of needed site based on average sizes of sites with employment in Springfield, Springfield UGB shows that the average size assumed for a site in the 20-acre and larger size category is 63 acres for industrial and 60 acres for commercial. This determination is supported by the evidence and analysis in the CIBL/EOA

<u>Use of confidential data in the CIBL/EOA land need determination analysis.</u> Ms. Nelson questions the data used in Table 5-2. It is important to note that the City requested data from the Quarterly Census of Employment and Wages (QCEW) Program to be used by ECONorthwest in the City's employment land analysis and the City signed a confidentiality agreement regarding use of that data. The United States Department of Labor, Bureau of Labor Statistics web page[8] provides information about QCEW:

> *"The Quarterly Census of Employment and Wages Program is a cooperative program involving the Bureau of Labor Statistics (BLS) of the U.S. Department of Labor and the State Employment Security Agencies (SESAs). The QCEW program produces a comprehensive tabulation of employment and wage information for workers covered by State unemployment insurance (UI) laws and Federal workers covered by the Unemployment Compensation for Federal Employees (UCFE) program. Publicly available files include data on the number of establishments, monthly employment, and quarterly wages, by NAICS industry, by county, by ownership sector, for the*

[7] CIBL/EOA, p. vi. Figure S-1.
[8] http://www.bls.gov/cew/cewover.htm accessed on October 18, 2016

entire United States. These data are aggregated to annual levels, to higher industry levels (NAICS industry groups, sectors, and supersectors), and to higher geographic levels (national, State, and Metropolitan Statistical Area (MSA)).”

“The QCEW program serves as a near census of monthly employment and quarterly wage information by 6-digit NAICS industry at the national, State, and county levels. At the national level, the QCEW program publishes employment and wage data for nearly every NAICS industry. At the State and area level, the QCEW program publishes employment and wage data down to the 6-digit NAICS industry level, if disclosure restrictions are met. In accordance with BLS policy, data provided to the Bureau in confidence are not published and are used only for specified statistical purposes. BLS withholds publication of UI-covered employment and wage data for any industry level when necessary to protect the identity of cooperating employers. Totals at the industry level for the States and the Nation include the nondisclosable data suppressed within the detailed tables. However, these totals cannot be used to reveal the suppressed data.” (emphasis added)

There is substantial evidence in CIBL/EOA to establish that City’s inventory meets State requirements for such inventories.

There is substantial evidence in CIBL/EOA and in the record documenting and establishing the need for sites much larger than 20 acres, and the lack of large sites in Springfield, in the Metro area and in the Oregon to meet the needs of employers who require large sites. 1000 Friends has not challenged that evidence.

1000 Friends also asserts that the City erred by including large development sites like the Peace Health RiverBend Medical complex and Gateway Mall shopping center in the historic data used to calculate average size of needed commercial mixed use sites, because such sites are atypical “one offs that won’t be recreated during next 20 years.”

While Springfield certainly aspires to create opportunities for more so-called “one off” developments (such as the PeaceHealth RiverBend Campus) the 2015 Final CIBL/EOA land need determination, the 2030 Comprehensive Plan and UGB expansion amendments do not address such “one-offs.” The CIBL/EOA clearly states that such “one off” opportunities are *not* provided for in the land need determination and if aspiration to provide sites for “one-offs” were to be included, the City would need a much larger UGB expansion than the modest expansion proposed.

1000 Friends Issue 1 Conclusion. The City considered the materials submitted by 1000 Friends and concludes that there is substantial evidence in CIBL/EOA to demonstrate that the average size of needed sites the City chose is based on substantial evidence about large sites in Springfield and on substantial evidence about the needs of the City’s target industry employers. 1000 Friends testimony does not explain why it is unreasonable for the City to rely on this evidence and analysis.

1000 Friends Issue 2: City failed to re-designate surplus industrial sites to meet its commercial deficit. Large commercial and industrial sites are interchangeable.

Citing CIBL/EOA Table 5-1 and OAR 660-0240050(4), 1000 Friends states "*there are no significant differences between the EOA's site characteristics for industrial and commercial targeted industries on site larger than 5 acres*" and based on that assertion, and on the assumption that "*many probably are suitable*," concludes that the identified deficit of 4 commercial sites in the 5-20 acres range "*could easily be met by strategic re-designation of 4 of the 18 inventoried industrial sites."*

Ms. Nelson implies that that City's application of the Urban Holding Area- Employment (UHA-E) plan designation to the lands added to the UGB demonstrates that the City considers all industrial and commercial site needs to be the same or interchangeable, and from that infers that *"many"* existing 5-20 acre industrial sites scattered throughout the existing UGB *"probably are suitable"* for designation to either employment type. The City disagrees with this assertion. The City's UHA-E designation establishes urbanizable employment land, protects suitable large parcels from land division, and requires future planning to assign the appropriate employment plan designation. This is not analogous to meeting commercial-mixed use land needs through redesignation and rezoning of existing industrial lots.

The City's inclusion of suitable employment land in the UGB expansion areas that could potentially accommodate a range of target employers/employment types does not imply, as 1000 Friends suggests, that any or some industrial sites within the existing UGB should be assumed suitable to meet commercial-mixed use site needs in the 5-20 acre site size category. The 2030 Plan designates land suitable to accommodate a more diverse range of employment uses in the planning period than currently exist in the City's existing land base of commercial, industrial and mixed use designated land. The 2030 Plan also maintains a supply of industrially designated and zoned land that is suitable to accommodate Springfield's so-called "legacy" type industries as they exist today and as they are expected to operate and grow in the future. This is the portion of Springfield's land base that is assumed to be planned and zoned to accommodate existing jobs and a portion of the forecast growth that will not require vacant land.

1000 Friends implies that industrial land and commercial land are interchangeable. The City disagrees. The City's findings under Issue 1 above begin to explain the difference. The Metro Plan and Springfield Development Code clearly distinguish different types of land for industrial and other employment uses by providing multiple and differing industrial, commercial and mixed use land use plan designations and zoning districts to accommodate such uses.

The City's findings explain how the existing land base in Springfield is assumed to provide sites for substantial amounts of redevelopment in the 2010-2030 planning period - including land to meet all residential land needs without expanding the UGB, and sites to provide employment growth that does

not require vacant sites. There is substantial evidence in CIBL/EOA to set forth the characteristics of needed commercial and mixed use sites and the City's findings provide substantial evidence to explain how the proposal meets OAR 660-024-0050(4). See also letter from Jeffrey Condit dated October 27, 2016. [9]

1000 Friends Issue 2 Conclusion. The City considered the materials submitted by 1000 Friends and concludes that 1000 Friends' arguments are speculative and do not constitute substantial evidence the City could rely upon to demonstrate that four industrial sites are suitable and could be assumed available to meet identified need for target industries that require commercial mixed use sites.

1000 Friends Issue 3. Failure to inventory all existing 20-acre sites. Citing Table 5-1, 1000 Friends asserts that several 20+ acre sites were not captured in inventory. As stated on page 2 above, the materials provided in the 1000 Friends attachments depict data describing tax lots and conditions available in 2016, as downloaded by Mia Nelson from the internet in 2016. The City's CIBL inventory was completed by ECONorthwest in July 2008. Some of the lots depicted in the 1000 Friends attachments have changed since the 2008 inventory. Staff provided the correct inventory information to Mia Nelson, but Ms. Nelson did not adjust her testimony to reflect the correct inventory data. Thus staff provided correct information from the CIBL inventory into the record[10] and addressed the sites in these supplemental findings.

The CIBL inventory data is based on the tax lot and constraints data available at time of the 2008 inventory. The CIBL is a "snapshot in time" and Springfield is not required to re-inventory previously inventoried lands to account for changes on or to these sites since the inventory was conducted. [11] The following information provides response to the testimony submitted.

Wildish Glenwood site. For the purposes of the Commercial and Industrial lands inventory, the CIBL/EOA concluded that this site does not provide a site in the 20-acre and larger category to meet identified site needs in the 2010-2030 planning period, based on the lots lines and constraints data as they existed at the time of the inventory. The FEMA floodway as mapped in 2008 inventory, bisected the site. A Letter of Map Revision (LOMR) was approved by FEMA subsequent to the inventory. There have been lot line and ownership changes since the inventory. The middle parcel in the holding was purchased by EWEB. The best data at the time of the inventory was used in the inventory. The CIBL inventory data base file is the data set used in the analysis, not maps submitted by 1000 Friends.

Brand S Road, Jasper Natron 29 acre mill site 18021000000900 – The City considered and evaluated a 29-acre site in CIBL/EOA Table 2-12 "Site-by-site review of parcels with redevelopment potential, sites 20 acres and larger, Springfield UGB , 2008" p.36. For the purposes of the Commercial and Industrial

[9] November 7, 2016 Agenda Item Summary Attachment 1, Exhibit A-1, later dated October 27, 2016.
[10] November 7, 2016 Agenda Item Summary Attachment 1, Exhibits A-2, A-3.
[11] See Exhibit F Findings, page 145-146 and footnote 127. "The City is not required to "to undertake multiple, shifting iterations of the same analysis as it moves through the planning and adoption process."

lands inventory, the CIBL/EOA concluded that this site does not provide a site in the 20-acre and larger category to meet identified site needs and likely to be redeveloped in the 2010-2030 planning period, based on the data as they existed at the time of the inventory. This tax lot has changed since the inventory. The CIBL inventory is a snap shot in time. The best data at the time of the inventory was used in the inventory. The CIBL data base file is the data set used in the analysis, not maps submitted by 1000 Friends. As noted above, the City may rely on the information available or collectible at the of the preparation of the CIBL/EOA. The City finds that it continues to be reasonable to do so, notwithstanding that some development has occurred since that CIBL/EOA was developed.

Marcola Meadows. For the purposes of the Commercial and Industrial lands inventory, the CIBL/EOA classified the 44 total commercial acres in the inventory as "master planned," based on the approved Marcola Meadows Master Plan (CIBL/EOA, pp. 19, 74). The CIBL/EOA concluded that this site does not provide a site in the 20-acre and larger category to meet identified site needs in the 2010-2030 planning period. Nothing in the approved Master Plan[12] requires a 20-acre site to be reserved. Instead, the Master Plan provides "Commercial Villages" sites as follows:

Area 3 "Alder Plaza Professional Office" 4.47 gross acres
Area 4 "Marcola Meadows Neighborhood Retail" 14.87 gross acres
Area 5 "Marcola Meadows Main Street Retail" 6.66 gross acres
Area 6 "Marcola Meadows Community Retail" 5.83 gross acres
Area 7 "Marcola Meadows General Retail" 13.77 gross acres

Total commercial villages 45.6 gross acres, 42.28 net acres.

Page 1-5 of the approved Master Plan depicts planned locations of 2 residential villages and 5 commercial villages. The commercial villages are located in 5 separate areas of the property and are proposed to be developed in Phases 2 and 4. Buildout of the site as approved will provide sites for four types of retail commercial uses and 4.47 gross acres of land for "professional office" uses to complement the residential villages in the plan. Although the site remains vacant at present, the approved Master Plan is still valid and deed restrictions have been recorded to ensure implementation of the Master Plan including but not limited to: Condition 13 restricting permitted uses to the uses permitted in the Mixed Use Commercial District; Condition 16 restricting limit of commercial buildings to 30 feet when located within 50 feet of LDR District west of Martin Drive; Condition 18 restricting permitted uses to those uses permitted in the Nodal Development Overlay District (SDC 3.3-1010B applicable to the Mixed Use Commercial District). The property abuts low density residential neighborhoods on 3 sides.

[12] City File No. LRP2007-00028 The Villages at Marcola Meadows Final Master Plan, approved July 3, 2008, recorded July 25, 2008.

The largest "village" is the General Retail village 13.77 acres, where a home improvement store was proposed. Even if the two "community" and "general" retail villages were combined, the combined site size of the two lots would be 19.6 acres gross/18.77 acres net, and would not be counted as a 20-acre or larger site, and does not account for constraints deductions.

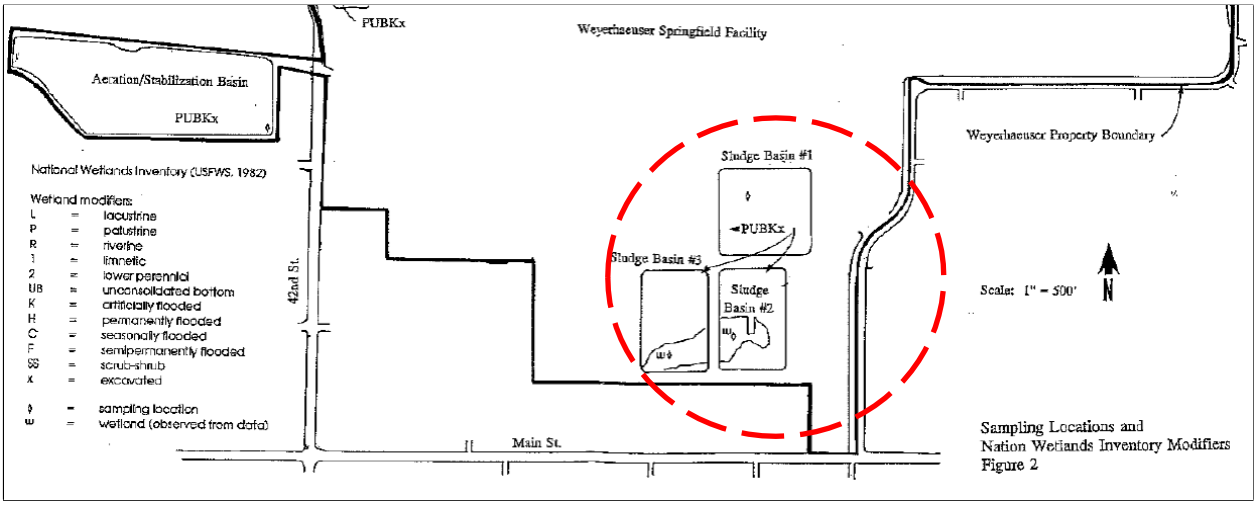
The CIBL inventory is a snap shot in time. The best data at the time of the inventory was used in the inventory. The CIBL data base file is the data set used in the analysis, not maps submitted by 1000 Friends.

CIBL/EOA Table 2-6 p. 19 shows that 161 unconstrained acres (18 tax lots) were classified as "Master Plan" in the inventory. The CIBL inventoried only the portion of the master planned sites that area approved for employment uses. Both Master Plans — Marcola Meadows and PeaceHealth River Bend — also include residential land. Master plan areas are shown in CIBL/EOA Map 2-2.

<u>Weyerhaeuser/IP site southern 75 acres.</u> 1000 Friends identities this site as a *"grass field with no improvements."* 1000 Friends asserts that site contains 30 buildable acres on 3 vacant lots and up to 75

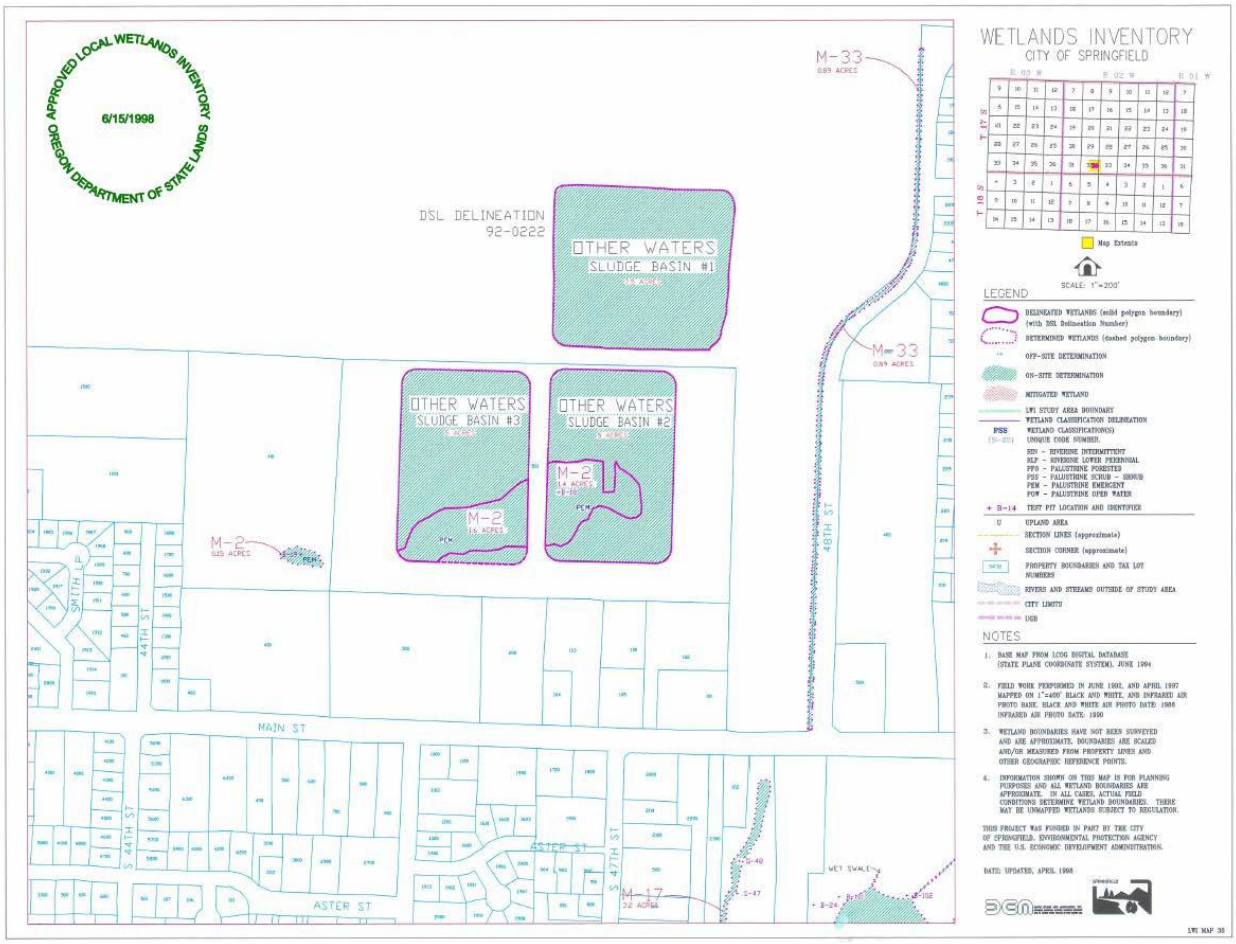
acres across all 4 lots, and states *"At least 1 20-acre "potentially redevelopable"* site should be counted." The City considered and evaluated a 115-acre site in CIBL/EOA Table 2-12 "Site-by-site review of parcels with redevelopment potential, sites 20 acres and larger, Springfield UGB, 2008" p.36. For the purposes of the Commercial and Industrial lands inventory, the CIBL/EOA concluded that this site does not provide a site in the 20-acre and larger category to meet identified site needs and likely to be redeveloped in the 2010-2030 planning period, based on the data as they existed at the time of the inventory. The tax lot changed since the 2008 inventory.

City's use of Local Wetland Inventory (LWI) GIS data in CIBL inventory. 1000 Friends identified an error in the constraints applied to the site in the CIBL inventory. 1000 Friends states that ponds/former ponds on the site were erroneously counted as a wetlands constraint in the CIBL inventory, submitting a 1992 letter from Kenneth Bierly, Oregon DSL Wetlands Program Manager (re wetland delineation report for T17S, R2W, Section 32) as evidence. The letter states that DSL will treat the sites listed in the letter as indicated. The 1992 letter lists Sludge ponds 1, 2 and 3 as *"not regulated under Oregon's Removal-Fill law;"* and states *"The proposal to utilize the Sludge Basins or log pond to an aeration basin would not be regulated by the Division of State Lands. You should consult with the Corps of Engineers on the application of their regulatory program to the sites."*



Map excerpt from 1992 letter from Kenneth Bierly, Oregon DSL Wetlands Program Manager re wetland delineation report for T17S, R2W, Section 32, annotated by staff to highlight location of sludge ponds in southern portion of site in red.

Staff reviewed the materials submitted and agrees that the City's constraints data for this parcel counted ponds shown in the Local Wetland Inventory (LWI) GIS data layer on the site as wetlands. The 2008 CIBL was based on the best available GIS data at the time, and these ponds were depicted in the LWI GIS data layer used in the inventory. Springfield's LWI was approved by DSL in 1998. Staff consulted the Springfield Local Wetland Inventory and Natural Resources Study to seek references to the identified wetlands and other absolute constraints on the site.



Springfield Local Wetland Inventory (Approved by DSL June 15, 1998):

- Wetland code M02. "Probable hydrologic source is subsurface flow and surface runoff. DSL has accepted Woodward-Clyde delineation as log pond—no DSL jurisdiction. 3.12 acres. David Evans and Associates wetland determination: YES."

- Letter from Oregon DSL staff Emily Roth, dated June 24, 1994:

    - "Review of the draft inventory was based on criteria in the 1987 Corps of Engineers Wetlands Delineation Manual."

    - "Wetland identifier M02: DSL jurisdiction NO. Weyerhaeuser settlement pond that was artificially created from uplands. DSL letter 10/6/92 to David Barrows (DSL file #92-0222)."

    - "Wetland identifier M33: DSL jurisdiction YES/NO. Kizer Slough is jurisdictional; the log ponds are not as determined by DSL in letter dated 10/6/92 to David Barrows (Woodward Clyde Consultants)."

- Goal 5 Natural Resource Study: "site M33A 48th St. and WeyCo Channel. OFWAM: provides diverse wildlife habitat; hydrologic control function is intact. High Quality Wetlands. Inventories Riparian Resource. High Quality Resource."M33 is part of the 48th Street Channel. The channel is a tributary to a water quality limited watercourse (McKenzie River) and is already protected by a 50-foot setback and a site plan review requirement."

The CIBL inventory is a snap shot in time. The best data at the time of the inventory was used in the inventory — the LWI data in GIS. The CIBL data base file is the data set used in the analysis. At the time of the inventory, this site was part of the larger Weyerhaeuser Springfield Complex infrastructure. The City has considered the information submitted by 1000 Friends, but finds that adding the "sludge ponds" acres to increase the number of unconstrained acres on the site does not change the conclusions about this property in the CIBL inventory for reasons explained below.

1000 Friends suggests that any portion of a site without buildings demonstrates that a site is not needed by the employer, and thus the City could/should assume the site or a portion of the site as available inventory to meet identified land needs. The City disagrees with this interpretation. Adjacent tax lots or portions of tax lots that were being used in conjunction with the primary use of the site (outdoor storage, log yards, ponds, etc.) were assumed to be needed for the operations of the primary use and thus were not assumed as available inventory to meet Springfield's identified land needs. The following findings explain why this policy choice is reasonable and based on substantial evidence. See also letter from Jeffrey Condit, dated October 27, 2016. [13]

OAR 660-009-0015(3)(b)

> *"When comparing current land supply to the projected demand, cities and counties <u>may</u> inventory contiguous lots or parcels together that are within a discrete plan" or zoning district."* (emphasis added)

This provision of the Goal clearly states that the City <u>may</u> inventory contiguous lots or parcels together that are within a discrete plan or zoning district, but the City is not required to do so. The City has the discretion to choose.

<u>The City assumed the Weyerhaeuser/IP site as one large industrial complex site.</u> Adjacent tax lots or portions of tax lots that were being used in conjunction with the primary use of this industrial complex (outdoor storage, log yards, ponds, etc.) were inventoried together because they were assumed to be needed for the operations of the primary use and thus were not assumed as available inventory to meet Springfield's identified land needs. In 2006, the previous owner Weyerhaeuser Company submitted land use permit plans to the City of Springfield (File no. DRC2006-00015 Final Site Plan Equivalent Map). Drawing SPM-04-4405 – L-01 entitled "Weyerhaeuser Springfield Complex" depicts air photo and property features of the entire ownership — including the so-called "sludge ponds" portion of the site and other lands depicted in the altered air photos and tax lot maps submitted into the record by 1000

[13] November 7, 2016 Agenda Item Summary Attachment 1, Exhibit A-1, later dated October 27, 2016.

Friends. The 2006 "Site Plan Equivalent Map" filed at the City clearly depicts the large development area of the site as one entirety the "Weyerhaeuser Springfield Complex." The drawing/air photo clearly shows industrial site "development" features on the lots described in Ms. Nelson's letter (p. 10-13) as land that "*has no improvements and is not being used in conjunction with the paper mill operation; it is a grass field."* These features include a City sewer running between 42nd and 48th Streets, rail spurs, rail cars, tanks, roads, paved areas, sawdust/wood chip stockpiles, outdoor storage, ponds/remains of ponds, and stormwater management system outfall and monitoring points.

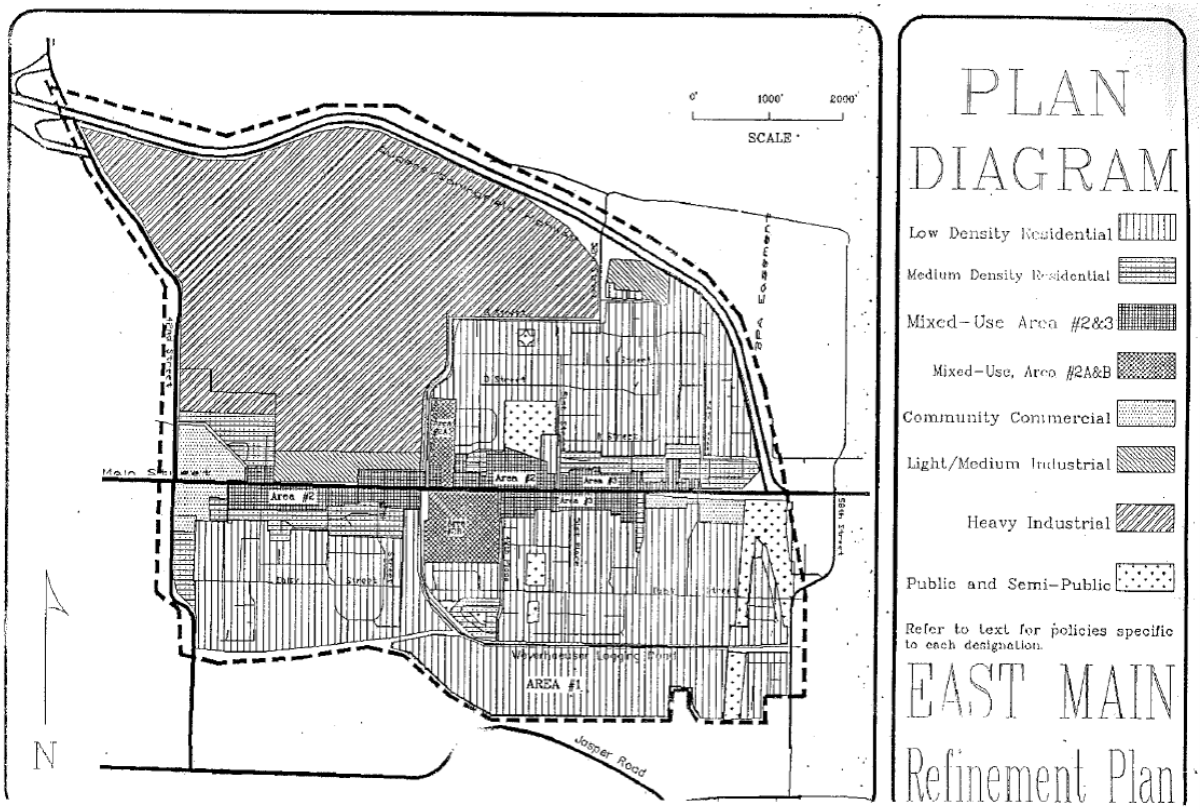
Evidence about this site exists in Springfield File No. DRC 2006-00015. Final Site Plan Equivalent Map Drawing SPM-04-4405-L-01 depicts for property lines, existing development and conditions on the ground for the full extent of the Weyerhaeuser Springfield Complex — including the tax lots mentioned in Ms. Nelson's letter — as of date of submittal March 2, 2006. The file has a copy of the Assessor's Maps for the property as configured in 2006: 17022900 tax lots 2900 and 2902 and lots created through Partition File No. 2000-11-0229 'Weyerhaeuser/Sierra Pine Partition." It is important to note that the 2006 maps clearly shows the property mentioned in Ms. Nelson's letter as part of the overall Weyerhaeuser Springfield Complex, even though the tax lots mentioned in Ms. Nelson's letter had been partitioned from the parent lot in 2000. Ownership from Weyerhaeuser to current owner IP EAT Three LLC was not recorded until August 4, 2008 – after the CIBL inventory was completed by ECONorthwest (July 2008). The Lane County Real Property Tax Lot Record shows the existing IP EAT Three LLC parcel 1702320000105 was created from 17023200 00100 in 2009. The Partition Plat map (File No. 2000-11-0229) indicates that Parcel 1 "not surveyed."

The Regional Land Information Data Base provides links to archived tax maps and ownership changes for Lane County Assessor Map 170232000. A deed (No. 2008-44702) transferring property ownership from Weyerhaeuser Company to IP EAT Three LLC x was recorded at Lane County Deeds and Records on August 4, 2008. City's inventory was based on property configurations and ownerships as of July 2008. Exhibit A Legal Description Pages 10-23 of the deed list 97 easements and exceptions on the property transferred.

Ms. Nelson asserts that the City erred by not counting on one 20-acre site in this complex to meet the need for one site 20 acres and larger. The CIBL inventory performed by ECONorthwest relied on the best available data at the time – including a GIS data set depicting Local Wetland Inventory (LWI) wetlands. Applying that data layer in the CIBL analysis resulted in the aforementioned "sludge pond" wetlands as "absolute development constraints." Had the jurisdictional status of the particular wetland in question been known and accounted for in the GIS data, fewer acres on the site would have been assumed constrained, potentially pushing one tax lot classified as "vacant" in the CIBL into the "20 acre" size category. The fact remains that even if that had been the case, the configuration of the "Weyerhaeuser Springfield Complex" depicted in the 2006 "Site Plan Equivalent Map" filed at the City would have been the best available information about the Weyerhaeuser Complex site at the time of inventory. The City did not have substantial evidence to assume that this important industrial complex would be broken up in the planning period or that the land occupied by filled in sludge ponds would become available for redevelopment by 2030 to accommodate the site characteristics of target

industries. Staff did not and is not required to conduct analysis to determine if the sludge ponds/former sludge ponds support redevelopment. The evidence provided by 1000 Friends does not change this fact. Again, the fact that some site by site changes have occurred since 2008 (as was inevitable) does not undermine the comprehensive overall analysis in CIBL/EOA.

<u>The City's CIBL/EOA analysis implements comprehensive plan policies intended to preserve the industrial land supply and to support expansion of existing industrial uses.</u> The comprehensive plan (Metro Plan and the applicable East Main refinement plan) designate the entire Weyerhaeuser/IP Complex site for Heavy Industrial land uses[14]. The Metro Plan Diagram clearly shows the entire Weyerhaeuser/IP Complex site is designated Heavy Industrial. The Weyerhaeuser/IP Complex site is located within the East Main Refinement Plan[15] area and is designated for Heavy Industrial use. The East Main Refinement Plan Diagram clearly shows the entire Weyerhaeuser/IP Complex site is designated Heavy Industrial:



[14] ORS 197.712(2) ***By adoption of new goals or rules, or the application, interpretation or amendment of existing goals or rules, the Land Conservation and Development Commission shall implement all of the following… (c) Comprehensive plans and land use regulations shall provide for at least an adequate supply of sites of suitable sizes, types, locations and service levels for industrial and commercial uses <u>consistent with plan policies</u>; (d) Comprehensive plans and land use regulations shall provide for compatible uses on or near sites zoned for specific industrial or commercial uses." (emphasis added)

[15] Springfield Ordinance 5432

The Weyerhaeuser/IP Complex site occupies more than 200 acres. The East Main Refinement Plan (page 13) noted how the growth of residential and commercial development on surrounding lands was creating conflicts with the industrial use. "As these pressures build it becomes increasingly important to assure the availability of land for the expansion of industrial uses and the compatibility of those industrial uses with neighboring residential and commercial property." The Plan (page 13) provides Criteria for Industrial Refinement Plan Designation:

East Main Industrial Element Criterion A states:

> *"Metro Plan policies and the Metro Plan Diagram shall be applied in designating land for industrial use in East Main."*

The referenced Metro Plan policies (p. II-G-7) clearly distinguish the difference between Heavy and Light Medium Industrial uses and plan designations:

> *"Heavy Industrial*
>
> *This designation generally accommodates industries that process large volumes of raw materials into refined products and/or that have significant external impacts. Examples of heavy industry include: lumber and wood products manufacturing; paper, chemicals and primary metal manufacturing; large-scale storage of hazardous materials; power plants; and railroad yards. Such industries often are energy-intensive, and resource-intensive. Heavy industrial transportation needs often include truck and rail. This designation may also accommodate light and medium industrial uses and supporting offices, local regulations permitting."*
>
> *Light Medium Industrial*
>
> *This designation accommodates a variety of industries, including those involved in the secondary processing of materials into components, the assembly of components into finished products, transportation, communication and utilities, wholesaling, and warehousing. The external impact from these uses is generally less than Heavy Industrial, and transportation needs are often met by truck. <u>Activities are generally located indoors, although there may be some outdoor storage.</u> This designation may also accommodate supporting offices and light industrial uses, local regulations permitting."*

Applicable Metro Plan policies referenced in East Main Criterion A include:

"B.5 Provide existing industrial activities sufficient adjacent land for future expansion.

B.10 Encourage opportunities for a variety of heavy industrial development in Oregon's second largest metropolitan area.

B.12 Discourage future Metro Plan amendments that would change development-ready industrial lands (sites defined as short-term in the metropolitan Industrial Lands Special Study, 1991) to non-industrial designations.

B.16 Utilize processes and local controls, which encourage retention of large parcels or consolidation of small parcels of industrially or commercially zoned land to facilitate their use or reuse in a comprehensive rather than piecemeal fashion."

(Metro Plan page III-B-4)

East Main Industrial Element Criterion B states:

> *"Encourage large blocks of Heavy Industrial land."*

East Main Industrial Element Goal 1 states:

> *"Encourage the location of new and expanding industrial development in the East Main area which is compatible with surrounding uses." Policy 3 states: "where Heavy Industrial Plan Designations abut residential uses, a 20 foot wide buffer with vegetative screen shall be required.*

East Main Refinement Plan Implementation Element p. 10 states:

> *"Redesignate lots 170232 301 and 401 from Light-Medium Industrial in order to allow further expansion of Weyerhaeuser."*

The City's evaluation of this site as part of the larger Weyerhaeuser Complex and its policy choices in the CIBL/EOA inventory implement the applicable comprehensive plan policies of the East Main Refinement Plan in regard to preserving large blocks of land to allow expansion at the Weyerhaeuser complex heavy industrial uses. In fact, the very parcels identified by Ms. Nelson were previously redesignated to Heavy Industrial to implement policies enabling expansion of the Weyerhaeuser heavy industrial complex.

The City's conclusion about the Weyerhaeuser Complex is supported by policies in the comprehensive plan.

The record provides information about the important rail infrastructure existing at this site.[16]

OAR 660-009-0005(11)

"Site Characteristics" means the attributes of a site necessary for a particular industrial or other employment use to operate. The 200-acre Weyerhaeuser industrial complex site — the largest in Springfield — is suitable to accommodate rail-served heavy industrial uses. The City needs large industrial sites to accommodate existing and future industrial uses, so it would be poor public policy to assume dissolution of the City's largest industrial site, as 1000 Friends suggests. The City's CIBL inventory concluded that the lots or parcels included in the Weyerhaeuser Complex at the time of the inventory were necessary for the continued operation of industrial complex to operate.

[16] Union Pacific Industrial land specialist Sandy Lindstrom provided staff with maps of functional rail lines, spurs and sidings in Springfield. Ms. Lindstrom noted the excellent rail facilities at the Weyerhaeuser complex and stated that such facilities are difficult to impossible to replicate today.

OAR 660-009-0015(3)(b)

> *"When comparing current land supply to the projected demand, cities and counties may inventory contiguous lots or parcels together that are within a discrete plan or zoning district.* (emphasis added)

This provision of the Goal clearly states that the City may inventory contiguous lots or parcels together that are within a discrete plan or zoning district, but the City is not required to do so. The City has the discretion to choose.

Definition of vacant applied to log decks and storage yards. See also letter from Jeffrey Condit, dated October 27, 2016. [17]

1000 Friends asserts that log storage yards on an industrial site are not permanent improvements and thus should be considered "vacant" land and thus must be inventoried as "vacant" per Goal 9 rule definition.

The City inventoried land in accordance with OAR 660-009-0015. City assessed suitability of "potentially redevelopable" sites, using criteria based on ECONorthwest professional expertise[18], and City's policy choices, and based on substantial evidence about large sites in Springfield and needs of target industry employers City hopes to accommodate. CIBL/EOA provides adequate explanation for choices made.

There is substantial evidence in CIBL/EOA and Exhibit F findings to demonstrate compliance with OAR 660-024-0050. Economic Element policies and implementation strategies support the aggressive redevelopment assumptions used in the CIBL/EOA.

The City made reasonable assumptions about redevelopment potential — and provided adequate explanation of how those assumptions were made in the 2015 CIBL/EOA. Tax lots identified by Ms. Nelson were indeed classified as "potentially redevelopable" in the database prepared by ECONorthwest, as explained in the 2015 CIBL/EOA. Each lot 5 acres and larger and classified as "potentially redevelopable" in the database was carefully examined.

Maintaining a supply of land designated and zoned to accommodate existing and target Heavy Industrial land uses. It is important to note that the sites Ms. Nelson says should be counted on as the City's land supply are designated and zoned Heavy Industrial (HI). Ms. Nelson seems to be implying that, rather than expanding the UGB to add large sites to accommodate target industries that require large sites, the City should assume that developed Heavy Industrial-designated and zoned sites or portions of sites

[17] November 7, 2016 Agenda Item Summary Attachment 1, Exhibit A-1, later dated October 27, 2016.

[18] ECONorthwest is a reputable economic planning firm "with over three decades of experience helping clients make sound decisions based on rigorous economic, planning and financial analysis", including considerable experience preparing land inventories and economic opportunities analyses for Oregon communities. http://www.econw.com/who-we-are accessed November 17, 2016.

could be re-purposed to accommodate Springfield's target industry employers. The problem with this line of reasoning is that it assumes that Springfield does not/should not require a land base suitable for heavy industrial uses.

Since many of the parcels 1000 Friends has identified (in the 9-12-16 letter and attachments) are currently designated and zoned for heavy and special heavy industrial use, staff prepared additional findings to explain uses permitted in these zones, to explain why retention of industrial land — sites suitable for heavy industrial manufacturing uses, outdoor storage of raw materials and heavy equipment, rail spur accessibility for freight rail shipments and heavy trucks — is important for Springfield's economy. These findings support the City's policy choice to *not* assume that all "potentially redevelopable" sites 5 acres and larger as listed and described in CIBL/EOA will be redeveloped in the 2010-2030 planning period to accommodate the City's target industry employers that require large sites.

The Metro Plan (p. II-G-7) describes the *Heavy Industrial* plan designation:

> ***Heavy Industrial***
>
> *This designation generally accommodates industries that process large volumes of raw materials into refined products and/or that have significant external impacts. Examples of heavy industry include: lumber and wood products manufacturing; paper, chemicals and primary metal manufacturing; large-scale storage of hazardous materials; power plants; and railroad yards. Such industries often are energy-intensive, and resource-intensive. Heavy industrial transportation needs often include truck and rail. This designation may also accommodate light and medium industrial uses and supporting offices, local regulations permitting.*

The Springfield Development Code Section 3.2-405C. describes the *Heavy Industrial (HI) Zoning district:*

> *Heavy Industrial District (HI). HI Uses are generally involved in the processing of large volumes of raw materials into refined materials and/or that have significant external impacts. Heavy industrial transportation needs often include rail and truck. Examples of these uses are: lumber and wood products; paper; chemicals and primary metal manufacturing; large scale storage of hazardous materials; power plants; and railroad yards. Less intensive industrial uses that are permitted in the LMI District are also permitted in this district.*

<u>Land currently designated and zoned Heavy Industrial (HI) or Special Heavy Industrial (SHI) in Springfield is needed to accommodate existing and future industrial land uses that are permitted only in the HI or SHI zones.</u> In Springfield, lumber, wood and paper products land uses are only permitted in the HI or SHI zones (SDC 3.-4.10). Businesses operating within this category of land use must buy or lease land or facilities in the HI or SHI zoning district. Without suitable sites zoned for these uses, lumber, wood and paper products land uses will not be able to operate in Springfield. Rezoning other lands to accommodate heavy industrial uses is very challenging for local governments because these operations typically have significant external impacts. Other manufacturing land uses that require Heavy Industrial zoned sites include but are not limited to recycling facilities, dairy products manufacturing, marijuana

business production facilities, concrete block and septic tank manufacturing, metal and metal alloy products, paint products and ice and cold storage plants. Without suitable sites zoned for these uses, these land uses will not be able to operate in Springfield.

It is important to note that the Springfield Development Code allows "outdoor storage of materials directly related to a permitted use" only where the permitted use is an allowed use in the zone. Thus, outdoor storage of raw materials used in the manufacturing uses listed above, including but not limited to logs, lumber, wood chips, sawdust piles, and the equipment necessary to operate the permitted use is only allowed in the HI or SHI zone.

The Metro Plan (p. II-G-7) describes the *Special Heavy Industrial* plan designation:

> ***Special Heavy Industrial***
>
> *These areas are designated to accommodate relocation of existing heavy industrial uses inside the urban growth boundary (UGB) that do not have sufficient room for expansion and to accommodate a limited range of other heavy industries in order to broaden the manufacturing base of the metropolitan economy and to take advantage of the natural resources of this region. These areas are also designated to accommodate new uses likely to benefit from local advantage for processing, preparing, and storing raw materials, such as timber, agriculture, aggregate, or by-products or waste products from other manufacturing processes.*

The Springfield Development Code Section 3.2-405D describes the *Special Heavy Industrial (HI) Zoning district:*

> Special *Heavy Industrial Districts (SHI): These areas are designated to accommodate industrial developments that need large parcels, particularly those with rail access.*

The Metro Plan defines the use of the term "development":

> *Development: The construction, reconstruction, conversion, structural alteration, relocation, or enlargement of any structure; any excavation, landfill, or land disturbance; and any human-made use or extension of land use.* (page V-2)

The Springfield Development Code Section 6.1-110 defines "development" for the purposes of regulating land use in the Springfield:

> *Development. Any human-made change to improved or unimproved real estate, including, but not limited to, a change in use; construction, installation or change of a structure; subdivision and partition; establishment or termination of a right of access; storage of materials, equipment or vehicles on the land; drilling and site alteration due to land surface mining, filling, grading, dredging, paving, excavation or clearing of trees and vegetation. Agricultural uses (including agricultural structures), when otherwise permitted by the base zoning district, are exempt from this definition unless agricultural structures are placed within adopted special flood hazard*

zones. As used in Section 3.3-400, Floodplain Overlay District, any human-made change to improved or unimproved real estate located within the area of special flood hazard, including, but not limited to, buildings and other structures, mining, dredging, filling, grading, paving, excavation, or drilling operations. As used in Section 3.4-280C., any activity within the Glenwood Riverfront portion of the WG Overlay District that would alter the elevation of the land; remove or destroy plant life; cause structures of any kind to be installed, erected, or removed; or result in a measurable change of any kind. (emphasis added)

1000 Friends asserts that City erred by not counting portions of developed Heavy Industrial sites as inventory to meet 2010-2030 employment growth needs. The air photos of the Weyerhaeuser/IP Complex, Rosboro and Sundance Lumber sites (identified as potential inventory by 1000 Friends) clearly depict structures, pavement, gravel areas, piles of materials, stormwater management facilities, filled ponds, and excavated areas, tanks, log decks and outdoor storage on these sites. Outdoor storage is a permitted use in Heavy Industrial (HI) plan designation and zoning. (Springfield Development Code Section 3.2-410 Industrial Zoning Districts Schedule of Industrial Use Categories) These areas were assumed to be necessary for the operations of the heavy industrial employment land use. In fact, such uses as those depicted choose to buy or lease land designated HI because outdoor storage is integral to their operations. A business owner purchases, uses, pays taxes, or leases the property it needs to conduct its business, including the land it needs to accommodate outdoor storage. To assume otherwise in the inventory would be speculative and poor public policy. The City supports accommodation and expansion of its existing "legacy" industries and has seen substantial re-investment in local mill facilities in recent years. The City identified:

- wood products manufacturing
- furniture manufacturing
- recreational equipment manufacturing
- specialty foods processing
- green construction firms
- organic food processing
- sustainable logging and/or lumber products manufacturing
- alternative energy production

as a target industries and assumes that the developed Heavy Industrial sites shown in 1000 Friends Attachments will continue to contribute to Springfield's economy.

The City's economic development strategy seeks to diversify and grow the economy. To achieve that goal, the City and partner Lane County are adopting the CIBL/EOA and the Springfield 2030 Comprehensive Plan Economic and Urbanization Element policies and implementation measures to provide a range of sites for economic development.

Springfield's target industries have varied site needs. The CIBL/EOA land need determination is based on the City's assumptions and policy choices that are centered on accommodating the majority of employment growth needs within the existing UGB — partly through redevelopment of some sites

inventoried in the CIBL, and in addition to meeting all of the residential growth needs that the City's 2011- acknowledged plan assumes will be 100% accommodated within the existing UGB. The City conducted both land inventories and need analyses concurrently and comprehensively. 1000 Friends is not challenging the City's aggressive assumptions about accommodating employment growth through infill and redevelopment. Meeting those assumptions and levels of infill and redevelopment growth require sites and land. The City's Comprehensive Plan policies (2030 Plan Residential and Economic Elements) explain how the City supports redevelopment though planning and zoning, by providing assistance through the existing Glenwood and Downtown Urban Renewal Districts, and by supporting other district and corridor planning initiatives.

At the September 12, 2016 public hearing, Ms. Nelson submitted questions regarding constraints data applied in the CIBL inventory – and noting discrepancies regarding FEMA floodway data and Local Wetland Inventory data used in the 2008 inventory. The City considered and addressed those discrepancies. The City determined that the Local Wetland Inventory GIS data, FEMA floodway data and the tax lot data available at the time the inventory was conducted, were used appropriately for purposes of the inventory, and that correction of these discrepancies has no bearing on the results of the 2008 CIBL inventory process and determination of land needs.

The City considered and addressed other constraints data applied in the CIBL inventory on sites highlighted by Ms. Nelson. The City determined that the constraints data (e.g. slopes shown in the GIS data) was used appropriately for purposes of the inventory, and that Ms. Nelson's objections to the City's use of that data has no bearing on the results of the 2008 CIBL inventory process and determination of land needs.

The City applied the same "Absolute Constraints" and other factors as explained in the City's findings under Goals 9 and 14 when it evaluated the potential suitability of lands outside the UGB. The City used GIS data appropriately for purpose of evaluating of potentially suitable land inside and outside the UGB to meet its employment land needs.

<u>1000 Friends Issue 3 Conclusion.</u> There is substantial evidence in the CIBL/EOA, the City's findings and the CIBL data base in the record to demonstrate the City properly inventoried lands as required by Goal 9. There is substantial evidence in the CIBL/EOA, the City's findings and the CIBL data base in the record to demonstrate the City's response to land need is consistent with the applicable provisions of Oregon statutes and administrative rules and applicable provisions of the comprehensive plan.

<u>1000 Friends October 13, 2016 email and attachments.</u> In an email and attachments submitted on October 13, 2016, Mia Nelson representing 1000 Friends posed additional questions about the CIBL inventory. Staff reviewed the information submitted and has concluded that the information submitted did not bring new arguments or information to light that had not already been considered.

<u>Slope constraints.</u> Ms. Nelson questions how slope constraints were identified in the CIBL inventory. There are slope constraints shown in the CIBL inventory data on sites she considers to be flat.

"SLOPE CONSTRAINTS - Somehow objects on the ground were counted as slopes. For example, I've attached the USGS topo map for the International Paper site, and it's so flat, there are not even any contour lines crossing the property. But the site is covered with red (signifying slope) on the constraints map. I cannot tell how much acreage has been wrongly excluded for slope constraint on the BLI."

Ms. Nelson submitted a topo map of the International Paper site (formerly Weyerhaeuser site at time of CIBL). No contour interval or legend is shown in her map.

The CIBL data base identifies areas of tax lots with slopes 15% or greater as constrained. ECONorthwest used the best available GIS data layer to perform the inventory. The data used is described in the CIBL/EOA p. 14: Source: 10 meter digital elevation model (DEM). File used: slopwes_over_15.shp, accessed 2008. Access. The CIBL data base is in the record.

"Sludge ponds."

"SLUDGE PONDS - As previously discussed, the ponds are not wetland and there is definitely an extra 20+ acre vacant site there that should be added to the inventory."

This issue is addressed above.

Master planned sites.

"MASTER PLANNED SITES - Riverbend and Marcola Meadows. It's impossible to tell how (or if) these were counted as sites. My best determination is that they were not counted at all. That is based on the fact that the EOA page 78 lists 4 commercial and 12 industrial vacant sites in the 5-20 acre site class….I found in the CIBL every one of those 16 sites (at least I think I did), and they were not the master planned sites. I made the attached document that shows all 16 sites, I numbered them and mapped them on the EOA's vacant land map. I included the CIBL info for the Master Planned entries. Also, I found the Marcola Meadows site plan, and it's clear now that about half the site is one contiguous commercial area. The EOA says it's 44 acres of commercial. But it's not included in the EOA's tally of sites on page 78 (if it had been, there would be more than just the four 5-20 acre sites, and zero 20+ acre sites, in the EOA's inventory). I could not find the Peace Health master plan, but suspect that these sites also were not counted."

This issue is addressed above.

"Maple Island"

"MAPLE ISLAND - I just noticed while doing this work that the entire Maple Island area (that's one of the proposed 50+ acre sites) is shown as 100% prohibitively constrained, I think due to riparian resources? Why is the city excluding sites already inside the UGB

for prohibitive constraints, but including this site? Shouldn't the same evaluation standards apply inside and outside the UGB?"

It is not clear which document or map Ms. Nelson is referencing in her statement: "*the entire Maple Island area (that's one of the proposed 50+ acre sites) is shown as 100% prohibitively constrained, I think due to riparian resources.*

It is not clear which "*sites already inside the UGB"* Ms. Nelson is referencing in her question.

It is not clear which "evaluation standards" Ms. Nelson is referencing in her question. The City's proposed plan amendments and evaluation of lands to meet identified needs are subject to the applicable Oregon statutes and administrative rules that direct how lands are to be evaluated. The City's findings address each applicable planning goal and rule.

Regarding the "Maple Island" question, Ms. Nelson may be referring to the Wicklund Trust property included in the North Gateway UGB expansion and to the Goal 5 Natural Resource site #S17 Maple Island Slough/McKenzie River as it affects the Wicklund property and how that property was considered in the City's UGB Location Alternatives Analysis. The City's findings under Goal 5 address Goal 5 resources (Exhibit F Findings, section beginning on page 436[19]). River Corridors and Waterways are addressed in the City's findings under Metro Plan Willamette River Greenway, River Corridors, and Waterways Element and Statewide Planning Goal 15: Willamette River Greenway (Exhibit F Findings, section beginning on page 424).

Lane County Goal 5 Significant Riparian Corridors map dated January 2004 shows the McKenzie River Riparian Resource for the Wicklund site outside the UGB. Inventory data used by Lane County to identify Goal 5 Riparian Corridors were:

"Maps of fish-bearing streams compiled by the Oregon Department of Forestry (ODF). Obtained in 2000. The data were verified and augmented by the lead fisheries biologist with the ODFW, Springfield office."[20]

"Riparian Corridors. The map titled Goal 5 Significant Riparian Corridors for the area inside the Plan Boundary but outside the Eugene-Springfield UGB, adopted and incorporated here, shall be used to identify significant riparian corridors for purposes of applying Goal 5 riparian protection provisions (Class I Stream Riparian Protection Regulations) in Lane Code Chapter 16.253 for areas outside the UGB and inside the Plan Boundary. The map is on file at the Lane County Land Management Division."[21]

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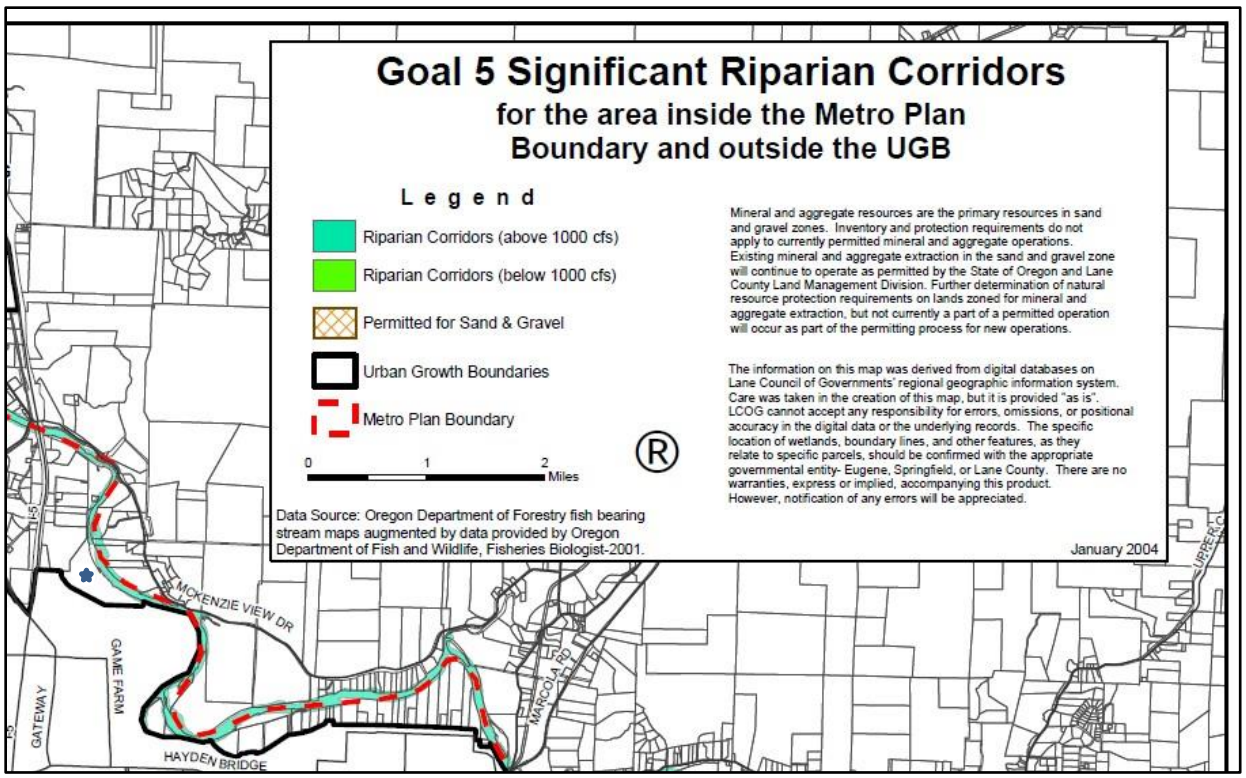
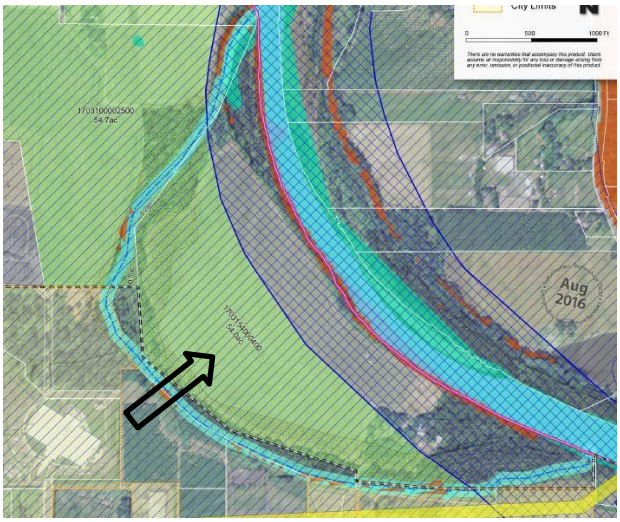
[19] Exhibit F Findings, p. 439 identify Goal 5 Resources located within or in proximity to Springfield's proposed UGB expansion areas. These include wetland M20 Maple Island Slough and riparian resource S17 Maple Island Slough.
[20] Lane County Statewide Planning Goal 5 Compliance for Wetland, Riparian Corridor, and Wildlife Habitat. (LCOG document center, http://www.lcog.org/DocumentCenter/Home/View/120

[21] Ibid



Excerpt from Lane County Map: Goal 5 Significant Riparian Corridors, January 2004 (emphasis added)

★ = Wicklund Trust property



Excerpt of Map: Proposed UGB Expansion Area – North Gateway[22], showing unconstrained land in green (arrow added to indicate Wicklund Trust property)

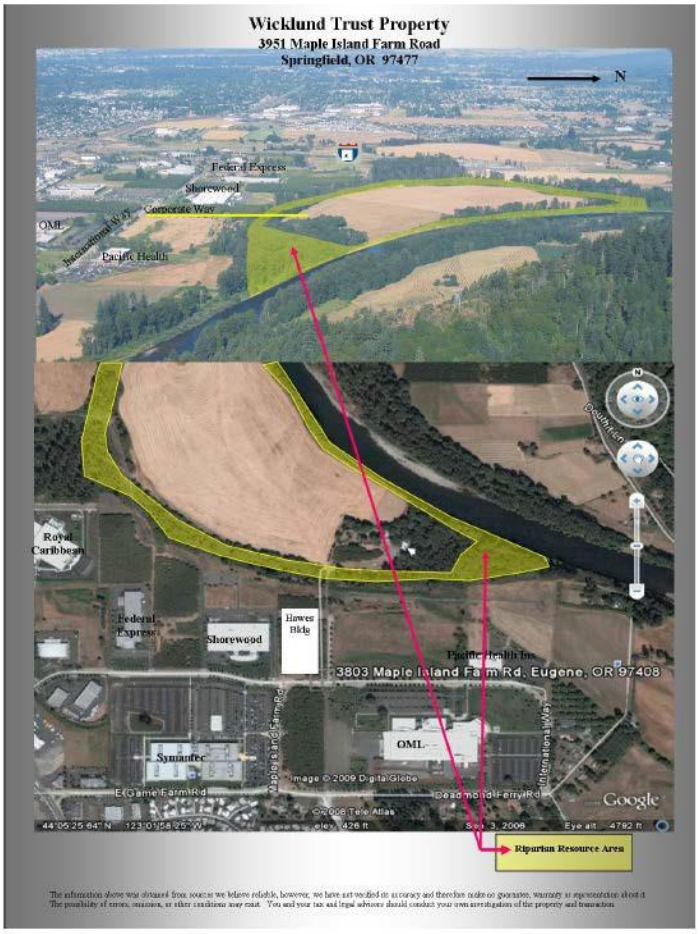
As stated in the City's findings, footnote 13 on page 439, the mapping of Goal 5 natural resources on this property was brought to the City's attention when Earle Wicklund submitted a letter dated March

[22] This map is include as Exhibit A-4-2 in the subject Springfield 2030 Plan amendments ordinance

4, 2011 questioning the depiction of riparian resource areas as constraints on land located outside the UGB owned by Wicklund Trust in several maps that were circulating as part of the City's residential and commercial/industrial land studies. The maps specifically identified in the Wicklund letter were "Employment Opportunity Area 1 North Gateway Area" (*"hand out during a late fall planning meeting"*) and "Map 3-4 Residential Land by Classification and Constraint Status," a map dated July 2009 included in the Residential Land and Housing Needs Analysis Draft Report.[23] Mr. Wicklund questioned why the farmed area between the Maple Island Slough and the McKenzie River was included in maps of riparian resources. The Wicklund Trust property abuts the UGB along the Maple Island Slough. The letter stated *"there is no record the entire Trust property was co-adopted as riparian resource by Lane County"* and asked the City to produce information to address this concern. Mr. Wicklund asked the City to produce the document that *"depicts the Riparian Resource constraint on the ENTIRE Trust property for the first time so that I can reference it at appeal or during the public hearing process."*

Page 5 of the Wicklund letter includes the following graphic:

[23]Map 3-4 was included in Attachment 2 of meeting packet materials for the February 22, 2011 Joint City/County Work Session: SPRINGFIELD 2030 REFINEMENT PLAN AND URBAN GROWTH BOUNDARY STEP ONE: PROPOSED AMENDMENTS TO THE EUGENE-SPRINGFIELD METROPOLITAN AREA GENERAL PLAN TO COMPLY WITH HB3337 (ORS 197.304).



Staff conducted research of Natural Resource inventory adopting ordinances and studies to investigate this matter and found nothing to refute Mr. Wicklund's statement: *"there is no record the entire Trust property was co-adopted as riparian resource by Lane County."*

On September 15th, 2004 Lane County adopted ordinance PA 1215: criteria for determining significant Goal 5 riparian or wildlife habitat sites outside the Springfield City Limits and within the Springfield Urban Growth Boundary; and an updated Goal 5 inventory for resource sites outside the Springfield City Limits and within the Springfield Urban Growth Boundary. Section 2 of Ordinance No. 1215 clearly states that the inventory adopted is the inventory for lands "*that, as of September 15, 2004, are located outside the city limits and <u>within the UGB</u> of the City of Springfield:*

> *"The list and map(s) (Which consist of 7 tiles) entitled Springfield Inventory of Natural Resource Sites, attached as Exhibit B are hereby adopted as part of the inventory of significant Goal 5 resources <u>for those areas listed/depicted thereon that, as of September 15, 2004, are located outside the city limits and within the UGB</u> of the City of Springfield."* (emphasis added)

The County's findings in support of Lane County ordinance PA 1215, Exhibit C, page 3, Goal 3, finding 11: *"These amendments do not apply outside the urban growth boundary…"*

The County's findings in support of Lane County ordinance PA 1215, Exhibit C, page 4, Goal 5, finding 13:

> *"The proposed amendment to the Metro Plan updates the Natural Assets and Constraints Working Papers to include an updated inventory and revised significance criteria that are consistent with OAR 660-23-030. The Springfield Inventory of Natural Resources Sites replaces the criteria and inventoried sites within the Springfield UGB that are listed in the "Significant Vegetation and Wildlife Areas" table in the Natural Assets and Constraints Working Paper. <u>The Inventory does not replace the working paper</u> <u>criteria or sites listed within the Eugene UGB or those sites within the exclusive</u> <u>jurisdiction of Lane County.</u> The Inventory updates the significance criteria used to identify <u>Springfield</u> resource sites as well as the list of sites that fit those criteria.* (emphasis added)

Lane County Ordinance No. 1233 "In the matter of adopting the Springfield Natural Resource Study for application outside the Springfield City limits and within the Springfield Urban Growth Boundary" was adopted July 12, 2006. Section 1 of the ordinance states: "The Springfield Natural Resource Study attached as Exhibit 'A' [24]is adopted for application on the urbanizable lands within the Springfield Urban Growth Area." On the same day, the County approved an ordinance (Ordinance No. 4-06) amending Lane Code Chapter 10, implementing protection measures for identified natural resource areas.

Lane County Ordinance No. 5-04 amended the Lane Code Chapter 16 to apply the Goal 5 "Safe Harbor" inventory and protection provisions to regulate development within the riparian corridors for the area between the UGB and the Metro Plan Boundary. Lane County chose to apply the "safe harbor" protections provided for riparian, wetlands and wildlife habitat resource sites in Statewide Planning Goal 5 (OAR 660-023-0090, 0100, and 0110).

The CIBL inventory of land within the UGB was the subject of considerable public review as it was compiled and presented in 2008-2009 and has been available for scrutiny by the public for more than eight years. Discrepancies regarding constraints data applied in the City's land inventory process that were brought to light by members of the public and evidence presented by members of the public were reviewed and addressed as part of that review. As alternative areas and sites for meeting land needs were considered and studied between 2009 and 2016, many maps were prepared and made available for public review. Discrepancies regarding constraints data applied in the study or other data shown in UGB concepts and study area maps that were brought to light by members of the public were reviewed and addressed as part of that review.

The City's analysis of potentially suitable employment land outside the UGB considered the evidence in Lane County's Goal Natural Resources data, the Springfield Natural Resources Study, the Springfield

[24] Lane County Ordinance No. 1233 Exhibit A is the Springfield Natural resources Study Report, October 2005.

Wetland Inventory, the Springfield Water Quality Limited Watercourses Map, Eugene-Springfield Metropolitan Natural Resources Study inventory documentation, information submitted by property owners and members of the public, and GIS-based analysis. The City determined that the Wicklund Trust property is not as Ms. Nelson suggests "100% prohibitively constrained."

Goal 5 resource inventories for the Wicklund site in accordance with OAR 660-023-0030 and amendment of the Springfield Natural Resources Study will be required prior to approval of a plan amendment or zone change that permits urban development on the site, as described in Urbanization Element Policies 47 and 48.

Urbanization Element Policy 50 requires an update of the Water Quality Limited Watercourses Map to address the areas added to the UGB. Maple Island Slough is a feature that straddles the existing UGB along the southern boundary of the Wicklund Trust property. The slough is on the Water Quality Limited Watercourses Map.

Conclusion: Maple Island Slough constraint data. The City considered and has addressed 1000 Friends question. The City previously investigated questions about the mapping of the natural resource on the Wicklund Trust property (in 2011) and based its decisions about constraints present on the property based on substantial evidence. The City properly used Lane County Natural Resource map data to identify riparian resource areas and wetlands in its evaluation of potentially suitable lands located outside the UGB and within Lane County's jurisdiction. Use of this data had no bearing on the results of the 2008 CIBL inventory of lands within the UGB.

1000 Friends "CIBL Recap" attachment. In her emailed attachment entitled "CIBL Recap" Ms. Nelson submitted annotated enlargements of a map from the CIBL/EOA Map 2-4– already in the record, and pages reproduced from the regional Land Information Data base (RLID) with no explanation of why they are attached.

The existing Heavy Industrial (HI) zoning district would not provide suitable sites for some desired target employers. The City would need to re-zone land and in doing so, existing HI land uses would become non-confirming uses in the zone. Upzoning land before economic conditions support feasibility of redevelopment has potential to produce negative effects and is not sound public policy, thus the CIBL and 2030 Urbanization studies have not recommended such re-zoning.

1000 Friends would need to present substantial evidence before the decision makers to demonstrate that 1) these sites possess the characteristics of needed sites identified in the CIBL/EOA; and 2) that these sites will be available in the planning period ending 2030 to address Springfield's deficit of sites larger than 20 acres, and thus eliminating or reducing the need to expand the UGB. 1000 Friends has failed to provide such evidence.

The City reviewed and considered the information submitted by 1000 Friends. No substantial evidence was submitted to demonstrate that the sites identified are suitable and possess the needed site characteristics to meet Springfield's identified land needs. No substantial evidence was submitted to

support different assumptions about the likelihood of redevelopment to meet identified employment site needs within the planning period. The City's assumptions, conclusions and policies about the likelihood of redevelopment to meet identified employment site needs within the planning period are reasonable and supported by the evidence in the record.

Conclusion. The City reviewed and considered the information submitted by 1000 Friends and finds that the information provided does not alter the results of the analysis or the comprehensive plan policy choices based on that analysis.

B. Response to challenges to Springfield's conclusions about meeting employment site needs through redevelopment and land assembly — submitted by 1000 Friends and others

Individuals (Grier, Nelson/1000 Friends, Saul most recently and others over the course of the process as documented in the record) submitted testimony suggesting that Springfield's need for employment sites — including sites larger than 5 acres — could/should be met entirely through assemblage and redevelopment of smaller parcels. George Grier stated: *"Site needs of many target industries could be met though parcel assembly or by intensive redevelopment or by repurposing underutilized parcels."*

Staff agrees with Mr. Grier's statement. Staff finds that these types of challenges to and criticisms of the proposal are not based on a complete reading of the proposal and the evidence in the record. The City's assumptions and analysis regarding redevelopment must be based on substantial evidence. The CIBL/EOA [25] provides that evidence. Adoption and acknowledgment of the CIBL/EOA and Comprehensive Plan amendments is considered to be urgent for Springfield as it establishes the contemporary factual basis and economic opportunities analysis to support the City's land use planning decisions, including important decisions about land use, zoning, transportation and infrastructure planning that are necessary to support the aggressive levels of redevelopment assumed in the proposal.

Assumptions about redevelopment and redevelopment that adds employment capacity on a site are incorporated in Springfield's inventory, analysis, site needs and policy choices as follows.

<u>Springfield concludes that 188 industrial sites and 340 commercial and mixed use sites would redevelop to address land needs over the 20-year period and that all land needs on sites smaller than five acres would be accommodated through redevelopment.</u> CIBL/EOA p. 79, Table 5-3 Comparison of employment land supply and site needs, Springfield UGB, 2010-2030 shows Springfield's land need is for sites of all sizes. Table 5-1 Comparison of vacant land supply and site needs, industrial and other employment land, Springfield UGB 2010-2030 shows that Springfield concludes that 188 industrial sites and 340 commercial and mixed use sites would redevelop and increase capacity on the redeveloped

[25] CIBL/EOA Chapter 5 Land Capacity and Demand, pp. 77-81

sites to address land needs over the 20-year period.[26] This assumption — that 528 sites would redevelop to address land needs over the 20-year period has not been mentioned in the testimony received. 427 sites less than 1 acre in size are assumed to provide increased capacity on the redeveloped site. 48 sites 1-2 acres in size are assumed to provide increased capacity on the redeveloped site. 46 sites 2-5 acres in size are assumed to provide increased capacity on the redeveloped site. 6 sites 5-20 acres in size are assumed to provide increased capacity on the redeveloped site. 1 site 20 acres and larger is assumed to provide increased capacity on the redeveloped site.

In summary, the City's analysis assumes that all "potentially redevelopable" sites smaller than 5 acres may redevelop over the 2010-2030 period. In addition to this assumption, the identified deficit of two commercial and mixed use sites smaller than 5 acres, which would require 6 acres of land is assumed to be met through redevelopment.[27] Clearly, assuming that all "potentially redevelopable" sites smaller than 5 acres may redevelop in ways that increase employment capacity on a site over the 2010-2030 period is an aggressive assumption for Springfield to make. The City can justify that assumption because of its focused efforts to support redevelopment within the Glenwood and Downtown urban renewal districts and its policies and plans supporting economic development, business growth and redevelopment throughout the City's business and employment districts.

The CIBL/EOA (pp. 82- 98) identifies site size as a characteristic of needed sites, stating: *"The demand for employment sites (summarized in Table 5-1) is driven by expected employment growth in industries that have historically needed sites <u>in different size groupings</u>."* (emphasis added) *"Table 4-2 summarizes the Comprehensive Plan designations <u>where Springfield's target industries are allowed within Springfield's UGB</u>."* The City's analysis assumes some target industries will find sites to meet their needs on sites designated for those uses. The land supply within the existing UGB that is designated for industrial and other employment uses will continue to accommodate existing uses, uses that do not increase employment capacity on a site, and uses that increase capacity on a site.

After assuming that all site needs for sites smaller than five acres would be addressed through redevelopment, the City's analysis examined all "potentially redevelopable" lots 5 acres and larger within the UGB (CIBL/EOA Table 2-12, pp. 33-38) and considered whether is it reasonable to assume that all or some of these lots would redevelop in the planning period. The results of that analysis are stated in CIBL/EOA p. 38.

As stated in the CIBL/EOA p. 27, only land that is "<u>likely to be redeveloped</u> during the planning period" is required to be considered as available land to meet the City's identified site needs, pursuant to OAR 660-009-0005(1) which addresses "non-vacant land that is likely to be redeveloped during the planning period" as a category of "Developed Land" (emphasis added):

[26] CIBL/EOA, Table 5-1, p. 78.
[27] CIBL/EOA, p. 79.

"not all redevelopment is relevant to a buildable land inventory; only redevelopment that adds capacity for more employment is relevant in the context of Springfield's commercial and industrial buildable lands inventory."

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

"For the purposes of this study, redevelopment must add capacity for it to be relevant to the buildable lands inventory."[28]

The City concluded that some, but not all "Potentially Redevelopable Sites 5 acres and larger are likely to be redeveloped during the planning period. It important to note that what is often lost in discussions about meeting growth needs through redevelopment is an unspoken assumption that existing land uses (businesses and homes) that would be displaced by such "re-purposing" will choose to or be able to find other sites on which to locate within the planning period to "free up" a supply of suitable land for such redevelopment. Therefore, it is appropriate and reasonable public policy to assume that 100 percent of all lots that are classified as "potentially redevelopable[29]" — based on empirical data for the purposes of the inventory — will not be available to meet identified employment land needs within the planning period and thus are not likely to be redeveloped during the planning period, as the City concluded based on the expertise of the City's consultant ECONorthwest.[30] Such a conclusion is not required under goals 9 and 14. Such a conclusion also would be based on a limited or faulty understanding of Springfield's land supply and the City's adopted plans and policies for accommodating its 20-year residential and employment growth needs within that land supply.

The results of the CIBL/EOA Table 5-4 show that Springfield has determined the need for two industrial sites larger than 20 acres and five commercial and mixed use sites 5 acres and larger, and a total land need of 223 acres that cannot be met within the existing UGB.

Land assembly.

OAR 660-009-0005(2)

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

[28] CIBL/EOA, p. 27.
[29] CIBL/EOA p. 11.
[30] CIBL/EOA, pp. 33-38 Evaluation of Potentially Redevelopable Land in Sites 5 Acres and Larger.

CIBL/EOA page 89, 93-94, 97-98 and Exhibit F Findings, p. 123-126 address the issue of land assembly. Fragmented ownership is widely recognized — even by smart growth advocates—as one of the most challenging aspects of infill development because

- land cost can be high compared to undeveloped sites;
- real estate is generally more expensive in infill locations than in outlying areas;
- multiple owners increases property negotiation times with corresponding higher transaction and holding costs;
- owners of critical parcels often choose to leverage higher premiums from buyers;
- critical parcels may not be available;
- properties can have lengthy chains of title that must be established before ownership can be transferred;
- coordination of demolition of existing structures and site clean-up across multiple parcels complicates phasing and financing of development, and brownfield sites can have higher underwriting costs associated with evaluating site conditions
- removal of encumbrances (right of way, easements, utilities) across multiple parcels complicates site design, land use approvals, phasing and financing of development;
- site acquisition uncertainty and delays complicate phasing and financing of development;
- financial models used by lending institutions can act as a barrier to financing projects that requires land assembly in areas that have experienced neglect and disinvestment.

Springfield was early to recognize the challenges of land assembly and to develop public investment plans and tools (Glenwood and Downtown urban renewal districts) as incentives to assist developers in overcoming these challenges. Such efforts have had limited success in renewal areas with significant levels of parcel fragmentation, for the reasons stated above.

Redevelopment.

OAR 660-009-0005(1),(14) Definitions

The following findings supplement the findings in Exhibit F, pages 28-32 related to the CIBL/EOA inventory of lands within the existing UGB.

Springfield's classification of land in the CIBL/EOA added a category: "Potentially Redevelopable." 1000 Friends (September 12, 2016) asserts that City *must* count certain tax lots identified in their attachments as available inventory to meet Springfield's land needs, citing the definition of "vacant" land in OAR 660-009-0005(14). 1000 Friends' argument is without merit because it is not based on a complete reading and understanding of the City's land classification working definitions and assumptions.

A key step in the City's inventory and analysis was to classify each tax lot into a set of mutually exclusive categories that would be most meaningful for the purpose of the inventory. The land classifications that Springfield used are different from those in OAR 660-009-0005(14), and were developed after

consideration of important input from the public.[31] CIBL/EOA p. 8 describes how the City's consultant ECONorthwest incorporated public input as the working definitions and assumptions were developed. The CIBL Stakeholder and Technical Advisory Committees reviewed the definitions in OAR 660-009-0005 (1) "Developed Land", and (14) "Vacant Land" to discuss the land classification "criteria" to be applied in the inventory. Redevelopment is a very important local economic development strategy and land use efficiency measure for Springfield that has received strong support by the public. Thus, the City's inventory added a third land classification category: "Potentially redevelopable." The committees believed that a more inclusive definition of "vacant land" would provide a more accurate estimate of Total Land Supply as defined by OAR 660-0090005(13):

OAR 660-009-0005 (13)

> *"Total Land Supply" means the supply of land estimated to be adequate to accommodate industrial and other employment uses for a 20-year planning period. Total land supply includes the short-term supply of land as well as the remaining supply of lands considered suitable and serviceable for the industrial or other employment uses identified in a comprehensive plan. Total land supply includes both vacant and developed land.*

The 2030 Plan assumes 22% of needed employment growth will be located on land classified as "Potentially Redevelopable." [32]

CIBL/EOA Table 2-2, p. 9 provides a comparison of the City's classifications for the purposes of the inventory and evaluation of the total supply of land estimated to be adequate to accommodate industrial and other employment uses for a 20-year planning period. CIBL/EOA Table 2-2 provides a comparison of the City's three classifications vs. the two definitions in OAR 660-009-0005 (1) "Developed Land", and (14) "Vacant Land". 1000 Friends and others have not challenged the land classification system the City applied.

The City's classification of vacant land is more inclusive than the OAR 660-009-0005(1) "Developed Land", and (14) "Vacant Land" definitions because more lands were examined for their potential to meet employment needs as follows:

- Applying the rule definition would allow the City to *not even consider* lots less than ½ acre in size. Those lots would have been considered off the table — not available to meet employment land needs. The "vacant" classification in the CIBL inventory includes lots or parcels less than one half acre in size. Thus, more land is considered "vacant" under the CIBL definition than under the rule definition.

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[32] See Exhibit F Findings under OAR 660-009-0020(1) Policy commitment to designate adequate sites and facilities, page 67-78 for Springfield's policy commitments to enable and foster redevelopment.

- Applying the rule definition would allow the City to exclude all lots or parcels 5 acres and larger where more than 0.5 acre is occupied by permanent buildings or improvements. Those lots would have been considered developed and not available to meet employment land needs. The "vacant" classification in the CIBL inventory did not automatically exclude all lots or parcels 5 acres and larger where more than 0.5 acre is occupied by pre-existing development. Thus, more land is considered "vacant" under the CIBL definition than under the rule definition. Lots occupied by pre-existing development were visually inspected to make a determination of whether they should be classified as developed or vacant.[33]

Because more lands were considered, (not automatically excluded as the rule definition would allow) the City concluded that classification of lands as "vacant" in the CIBL inventory is more inclusive than a strict application of OAR 660-009-0005(14) and provides a better estimate of the "Total Land Supply" that would be adequate to accommodate industrial and other employment uses for a 20-year planning period [OAR 660-009-0005 (13)].

The CIBL classification "developed" is also different than the OAR 660-009-0005(1) definition. The classification of "developed" in the CIBL inventory: "lands that are developed at densities consistent with current zoning/plan designation and improvements that make it unlikely to redevelop during the analysis period,"[34] distinguishes "lands that are not classified as vacant, potentially redevelopable, or public are considered developed." Lands "on which development has already occurred but on which, due to present or expected market forces, there exists the potential that existing development will be converted to more intensive uses during the planning period" are classified as "Potentially Redevelopable."[35]

<u>Conclusion: Springfield CIBL/EOA Land Classifications.</u> As shown in CIBL/EOA Table 2-2, page 9, the "vacant", "developed" and "potentially redevelopable" land classifications applied in the City's CIBL/EOA probe more deeply into the Springfield's land base to provide a more accurate picture of the Total Land Supply for analysis purposes than would be provided by applying the two-step/either-or developed/vacant land rule definition. The classifications provide a better estimate of the "Total Land Supply" that would be adequate to accommodate industrial and other employment uses for a 20-year planning period [OAR 660-009-0005 (13)]. The classifications that Springfield chose to use in the inventory and analysis to inform policy development for the 2030 Plan were reasonable, consistent with Goals 9 and 14 and appropriate given the City's policy choices to rely on redevelopment to meet a significant share of its employment growth (and residential growth) needs in the 2030 Plan.

Chapter 2 of the CIBL/EOA (pp. 5-41) provides thorough explanation of the inventory process, including how the land classifications were assigned to each tax lot in the CIBL inventory. The CIBL/EOA definition states:

[33] CIBL/EOA p. 10
[34] Ibid.
[35] Ibid. p. 11.

"Vacant land. Tax lots that have no structures or have buildings with very little value. For the purposes of this inventory, lands with improvement values under $10,000 (2008 Lane County Assessment and Taxation Data) are considered vacant (not including lands that area identified as having mobile homes)."

As explained on page 7, ECO used a multi-step verification process, using the most current data and air photos available at the time, "intended to provide the greatest degree of accuracy possible."

CIBL/EOA p. 23 Table 2-7 shows vacant and potentially redevelopable land.

CIBL/EOA p. 27-39 addresses capacity to accommodate employment growth through redevelopment. Building off the OAR 660-009-0005(1) definition of "developed land" the City's analysis screens and sorts through non-vacant lands that to consider which of these lands could be considered "likely to be redeveloped." The operational definition for the CIBL is:

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

ECO used the criteria on CIBL/EOA pp. 27-29 to analyze the non-vacant lands (including more lands that the City was required to consider under the OAR 660-009-0005(14) definition of "vacant) to determine which lands to classify as "Potentially Redevelopable." ECO explained their methodology in CIBL/EOA pages 27-31. ECO determined

"Because the improvement of land value ratio is a gross indicator, it is reasonable to assume that not all of parcels that meet this criterion for redevelopment potential will be assumed to redevelop during the planning period." [36]

ECO explained the rationale for the City's policy choice to exclude consideration of lots with lower redevelopment potential criteria from this classification — the "Lower Potential" grouping contains 28% of the City's total employment land base and 7,107 jobs. Thus it would not be reasonable to assume 28% of the land base will redevelop to increase capacity by 2030.

"The significant amount of land and employment in this category suggests limited redevelopment potential (for a land capacity analysis, redevelopment provides sites for employment growth only when an existing use is replaced by a use that has more employment)." [37]

Applying this assumption leaves 581 acres of land that were classified as "potentially redevelopable" in in the CIBL land base.[38] Use of this assumption was a policy choice by the City that was arrived at after consideration of alternatives by the CIBL Technical Advisory committee, Planning Commission and City Council. Map 2-6, p. 32 depicts the location of the lands classified as "Potentially Redevelopable."

[36] CIBL/EOA p. 29.
[37] Ibid. p. 31.
[38] Ibid. p. 30.

ECO examined each tax lot classified as "potentially redevelopable" in the land base.[39] As previously explained in the CIBL definition of "vacant land" this step evaluated tax lots with existing development that would have been off the table and excluded from consideration had the City applied the rule definition of "vacant land."[40] Use of that definition would have allowed the City to exclude all lots or parcels 5 acres and larger where more than 0.5 acre is occupied by permanent buildings or improvements. Those lots would have been considered developed and not available to meet employment land needs. The "vacant" classification in the CIBL inventory did not automatically exclude all lots or parcels 5 acres and larger where more than 0.5 acre is occupied by pre-existing development. Thus, more land is considered "vacant" under the CIBL definition than under the rule definition. Lots occupied by pre-existing development were visually inspected to make a determination of whether they should be classified as developed or vacant.

OAR 660-009-0015(2)

Chapter 4 and Appendix C of the CIBL/EOA address the requirements of OAR 660-009-0015(2) for the City to "identify the number of sites by type reasonably expected to be needed to accommodate the expected employment growth based on 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." Chapter 4 presents Springfield's potential growth industries and summarizes employment forecast.[41] Chapter 5 of the CIBL/EOA describes the site needs of target industries.

CIBL/EOA page 60 Figure 4-1 is a graphic showing the process for identifying site needs.
Table A-7, p. 122 shows a summary of *existing* employment. Map A-2, p. 126 shows employment in Springfield by plan designations. Table A-8, p. 127 converts employment to building types.
The trends analysis in Appendix A identified site needs in five types of buildings: Warehouse and Distribution, General Industrial, Office, Retail, and Medical & Government Institutions. Table A-10 and A-11, p. 129 shows percent of employees by building type and site sizes. Table A-12 shows potential growth sectors in Springfield, based on existing concentrations of employment and the Oregon Employment Department's forecast for employment growth. Pages 130-131 shows the Oregon Employment Department's list of 25 employment clusters on Lane County, from their report "Oregon's Traded Clusters: Major Industries and Trends." Regional business activity is summarized in CIBL/EOA pp. 132-136. Page 158 describes increases and decreases in the share of employment that are forecast. Table C-2 Summary of site requirements, p. 167-170 summarizes the common site needs for target industries and key issues related to sites in Springfield. This table includes examination of the employment land base within the existing UGB.

[39] Ibid. pp. 33-38.
[40] CIBL/EOA Table 2-8 shows that the City's analysis classified 41.4 total acres in lots less than 0.5 acres, including 29.3 unconstrained acres. Under the rule definition, those sites would not have been considered vacant.
[41] Appendix C provides documentation of the employment growth forecast.

Redevelopment conclusion. The City considered the testimony received and found no evidence to refute Springfield's conclusions that 188 industrial sites and 340 commercial and mixed use sites would redevelop to address land needs over the 20-year period and that all land needs on sites smaller than five acres would be accommodated through redevelopment. Springfield's conclusions and policy choices addressing the portion of employment land site needs to be met through redevelopment are reasonable and based on substantial evidence.

C. Response to concerns about Boundary Location Alternatives Analysis — submitted by Johnson Crushers and Willamette Water Company

The Law Office of Bill Kloos PC submitted a letter dated August 22, 2016 on behalf of Johnson Crushers International (JCI). That letter was included in the agenda packet for the September 12, 2016 meeting. The Law Office of Bill Kloos PC submitted a letter dated October 13, 2016 on behalf of Johnson Crushers International and Willamette Water Company (JCI/WW). The October 13 letter states that it "summarizes key points from those letters and discusses evidence submitted during last month's joint hearing and issues raised during the course of the UGB expansion process." Staff's response to both letters is provided below.

JCI/WW disagrees with the results of the City's UGB Alternatives Analysis. JCI/WW asserts that the City erred by not including the Seavey Loop area in the UGB expansion, and thus property owned by Johnson Crushers International and lands currently served by the Willamette Water Company were wrongly excluded. JCI/WW asserts that the City's UGB Alternatives Analysis is not consistent with the ORS 197.298 priority scheme.

The City respectfully disagrees. The City's findings (Exhibit F, pp. 156-421) explain and demonstrate how the City's analysis and the results of that analysis correctly follow the Commission's and Court's interpretation of the application of Goal 14 factors in the McMinnville decision, following an outline provided by DLCD staff. See also letter from City's legal counsel Jeffrey Condit, October 27, 2016 in response to assertions made by JCI/WW. [42] The City's findings under Goal 9 and Goal 14 (Exhibit F pages 18-166) provide thorough explanation and ample evidence to justify the need for suitable sites to meet the City's economic objectives, including uses with special siting characteristics and the quantity, type and characteristics of needed sites consistent with the applicable provisions of the law and plan policies; and how the City's 2030 plan policies and UGB amendment will provide those suitable sites. The City's findings (Exhibit F pages 156-421) provide thorough explanation and ample evidence to justify the location of the UGB amendment. These supplemental findings outline how lands within the Seavey Loop area were excluded.

[42] November 7, 2016 Agenda Item Summary Attachment 1, Exhibit A-1, later dated October 27, 2016.

All second priority exception parcels were identified, examined and considered.
The City excluded second priority lands that are not buildable:

- excluded Slopes >15%
- excluded Floodway
- excluded Riparian resources
- excluded Wetlands

The City considered and excluded second priority lands based upon specific land needs (197.298(3)(a)).

The City excluded exception parcels with less than 5 unconstrained acres.

- This step excluded the McKenzie View A; West Jasper/Mahogany; Clearwater; Seavey Loop A, D, F, and Seavey Loop/Goshen exception parcels from further consideration.

The City considered and excluded second priority lands based upon inability to reasonably provide urban services due to physical constraints (197.298(3)(b))(Exhibit F, pp. 213-)

- This step excluded McKenzie View B; Mohawk A, B and C; Oxbow/Camp Creek; Jasper Bridge A and B; Far East B; Wallace Creek; Seavey Loop B, C and E exception parcels because these areas do not provide and cannot reasonably be expected to be provided with the public water, wastewater, stormwater and transportation infrastructure and services necessary to serve urban employment uses due to physical constraints. The City determined that these areas are not serviceable to meet Springfield's identified industrial and commercial land use needs during the 2010-2030 planning period. [OAR 660-009-0005(9)]

All fourth priority parcels were identified, examined and considered. The City considered and excluded fourth priority lands that are not buildable:

- excluded Slopes >15%
- excluded Floodway
- excluded Riparian resources
- excluded Wetlands

The City considered and excluded fourth priority lands based upon soil capability classification.

- The City excluded unconstrained Seavey Loop lands comprising predominantly Class II, Class III High Value and Class IV Prime Farmland soils on the basis of agricultural capability classification.

The City's findings describe the City's factual basis for addressing soil capability classification (Exhibit F, page 324-350). See also Exhibit A-5 Agriculture and Forest Soil Ratings, Lane County Land Management Division, a list of NRCS soil map units that clearly shows Class 3 and 4 soils that are identified as "High Value Farmland."

The City considered and excluded fourth priority lands based upon inability to reasonably provide urban services due to physical constraints (197.298(3)(b)).

- This step confirmed exclusion of Seavey Loop on the basis of inability to reasonably provide urban services due to physical constraints.

The City considered and excluded fourth priority lands based upon analysis of comparative ESEE consequences (Goal 14,Boundary Location, Factor 3);

- This step confirmed exclusion of Seavey Loop (contrary to compact urban form, cost inhibitive infrastructure upgrades, social, cost/benefit, farmland)

The City considered and excluded fourth priority lands based upon analysis of compatibility with agricultural & forest activities (Goal 14, Boundary Location, Factor 4)

- This step confirmed exclusion of Seavey Loop

The City disagrees with JCI/WW assertions (shown in italicized font) as follows:

> *"Note that the exception areas within Area 9, Seavey Loop, are more extensive and more diverse than other exception areas."*

<u>"Extensive and diverse" are not criteria for prioritizing land under ORS 197.298, Goal 14 or Goal 9 rules.</u> The City's Findings (Exhibit F) demonstrate that City evaluated <u>all</u> exception lands in the study area.

> *"Some of the land is EFU land, but as will be discussed momentarily, that land too is of higher priority than the EFU lands for areas the proposal recommends for inclusion into the UGB."*

> *"Again, the evidence in the record demonstrates that the resource lands within the Seavey Loop area contains lands of lower soil capabilities than do those of the Mill Race area and the northern portion of the North Gateway area. This is plainly demonstrated in the attached Exhibit 4, which shows soils classifications by shades of brown. The darker the color, the better the soil and the lower priority. Exhibit 4 is annotated with yellow clouds around three key areas. It is plainly evident that the Seavey Loop area includes light to medium shades of brown compared to the medium to dark shades of brown for the areas staff recommend for inclusion into the UGB. That means the agricultural lands for Seavey Loop have a higher priority for inclusion in the UGB expansion than the other two areas. No amount of finagled finding is going to persuade an appellate review body to disregard what their eyes plainly show them from the Soil Capability and Constraints map"*

> *"The findings misapply ORS 197.298(1)(d) and ORS 197.298(2)"… "But those soils are not the same, at least not for purposes of UGB expansion analysis." …."To the ORS 197.298 statutory priority scheme, this difference is significant and requires one area (Seavey Loop) to be brought into the UGB before the other area (Mill Race) if additional land is needed to meet the City's employment land needs after examination of higher priority lands."… "The findings do not make this distinction clear."*

…"Seavey Loop consists mostly of Class IV soils and is therefore lighter in color than the Mill Race area which consists predominantly of Class II soils."

The City's findings address soil capability correctly. JCI/WW fails to do a deeper reading of the applicable statutes regarding soil capability classifications. The City's findings (Exhibit F pp. 331-357) address and apply the correct statutory definitions of high value and prime farmland soils. The City analyzed all resource land in the UGB study area by soil capability as required by statute. The City's findings clearly identify soils and percentages thereof on each parcel. The City's findings provide substantial evidence, based on available Natural Resource Conservation Service (NRCS) soil survey data and distribution of soil units and high value farmland soils on the parcels.

<u>The statutory definitions address high value and prime farmland soils.</u> ORS 197.298 (1)(b) includes the reference to ORS 215.710 (High-value farmland description for ORS 215.705) cited in City's findings Exhibit F, page 167. This portion of the statute clearly recognizes that resource land with High Value soils is a factor to be considered when applying the priority scheme in the boundary alternative analysis. The general NRCS soils classification map does not depict the high value agriculture and prime soils listed in statute. See also Exhibit A-5 Agriculture and Forest Soil Ratings, Lane County Land Management Division, a list of NRCS soil map units that clearly shows the Class 3 and 4 soils that are identified as "High Value Farmland." The City confirmed that it evaluated soils correctly for this purpose with DLCD farm and forest land specialist staff.

> *"That map shows, even with the BPA easement and steep-slope areas excluded, multiple vacant or near vacant parcels of between 4 and 14 acres, as well as at least one parcel over 30 acres in size."*
>
> *"Note that the findings include the entirety of TL 306, the JCI parcel to the east of S. Franklin Boulevard, as being 20 acres, whereas Exhibit 5 only includes an 8.8-acre portion of that parcel. With the full JCI parcel, that would make two individual parcels of at least 20 acres in size available in Seavey Loop. Each of the above parcels, either individually or collectively for adjacent vacant parcels"*

The City's analysis as presented in the findings, examined all EFU parcels, in order of priority under ORS 197.298. Constrained acres were deducted from suitable acres. Many UGB expansion concepts and alternatives were studied, presented for public discussion, evaluated and rejected throughout the multi-year iterative process, including the concept/concepts depicted in JCI/WW's attachments. The JCI parcel east of Franklin is an EFU parcel, not exception land. The "College View" expansion concept was presented to the Stakeholder Working Group to examine and discuss a concept that would retain a "buffer" of EFU land west of South Franklin and along the south side of Seavey Loop Road. "The City's employment land needs have been identified as the need for 4 parcels between 4 and 20 acres totaling 37 acres, and three parcels greater than 20 acres totaling 186 acres."

"the City and County must first include Seavey Loop before it can look to those other areas to help meet the City's demonstrated employment land needs. That is what the statutory priority scheme set forth in ORS 197.298(1) requires."

"the City cannot leap frog over Seavey Loop simply because it alone cannot meet all of the city's needs. ORS 197.298 prohibits the City and the County from doing that."

"if any area is brought into the City of Springfield to meet the identified employment land need, it must include land in the Seavey Loop area before turning to other areas to bring in the remaining amount of land needed."

See Exhibit A-1. The City evaluated these parcels. The City's findings explain why exception lands and EFU lands in Seavey Loop are not suitable to meet identified land needs in the 2010-2030 planning period.

<u>Seavey Loop exception parcels have the same priority as all other exception parcels in the vicinity of the UGB the City evaluated.</u> Seavey Loop resource parcels, have same or lower priority as all other resource parcels in vicinity of the UGB the City evaluated. Thus the City is not required to "*include land in the Seavey Loop area before turning to other areas to bring in the remaining amount of land needed."* The City evaluated and rejected all exception parcels, including Seavey Loop parcels before turning to lower priority lands resource land under ORS 197.298.

"The findings substantially misrepresent the footprint of the Seavey Loop area under consideration.

*"Why is it that, when examining the exception areas within Seavey Loop, the analysis breaks the area down into 6, if not 7 different smaller segments identified as Seav*ey *Loop A through F and Seavey Loop/Goshen? Why are no other areas similarly broken down?"*

<u>The City's analysis as presented in the findings, examined all parcels in the study area, in order of their priority under ORS 197.298.</u> City did not "gerrymander" defined study areas in its UGB Alternatives Analysis. Instead, City conducted a thorough parcel – by parcel analysis to identify potentially suitable lands, in order of their priority under ORS 197.298.

The City's discussion of soils (p. 336) in "Seavey Loop area" refers to the greater Seavey Loop area, not to specific parcels. City's general discussion of soils in the vicinity of Springfield was included to provide context and "big picture" for the urbanization study, contrary to JCI/WW's claim.

Geographic areas with multiple groupings of exception land parcels were broken down into units and numbered to clearly discuss each grouping of parcels (including Seavey Loop, Far East Springfield, Mohawk and Wallace Creek) for ease of analysis, identification, and documentation.

"The above begs the question why the analysis failed to recognize that there is one industrially zoned parcel and three adjacent rural residential parcels that are each greater than 6 acres in size and are minimally developed"

The City's findings identified the zoning of each parcel in the study area, including all industrially zoned parcels and all residentially zoned parcels in the vicinity, and found none to be suitable. Other industrially and residentially zoned parcels in other UGB study area groupings exist in similar arrangements to configuration identified by JCI/WW. The City identified, evaluated and rejected them all and provided substantial evidence to explain why lands are not suitable to meet the identified needs.

"Instead of understanding the opportunity that the Seavey Loop area affords the City of Springfield to meet its demonstrated economic land needs, the analysis dissects the area so finely as to make the area unrecognizable as a whole."

City staff spent considerable time studying the potential suitability of the Seavey Loop area. For example, the record shows that the City conducted open houses, workshops, visioning sessions and stakeholder working group meetings to solicit information about the College View study area from a broad spectrum of stakeholders, as directed by the Springfield City Council. As previously stated, other areas were "dissected" into smaller units for ease of analysis, identification, and documentation. The City conducted a thorough parcel – by parcel analysis of potentially suitable lands in order of statutory priority.

"The findings misapply the ORS 197.298(3) exceptions to the statutory priority scheme."… "those statements only pay lip service to the requirements of the exception, at least in the instance of Seavey Loop,"… "distance of the length involved for Seavey Loop is not a physical constraint, it simply increases the cost of the utility improvements, something appellate bodies have concluded is not a permissible consideration."

"There is evidence in the record that the rough costs were evaluated, which begs the question of whether it has factored into the recommendation."

JCI/WW suggests that the City rejected Seavey Loop on the basis of cost to serve and asserts that by examining cost factors, the City erred. See Exhibit A-1. The City's findings provide substantial evidence to explain the need to provide suitable unconstrained land in its inventory to site target large employers. To be suitable, land must possess the characteristics of needed sites, including adequate parcel size and provision of urban services within the 20-year planning period.

The City's UGB Alternatives Analysis, as set forth in the city's findings, clearly follows the correct prioritization and application of Goal 14 Locational Factors as interpreted by the Court in *McMinnville* and as advised by DLCD Urbanization specialist staff Gordon Howard. It is not clear whether Mr. Kloos disagrees with the City's application of Goal 14 Locational Factors. It is the City's position that distance and topography (Willamette River) are physical constraints that preclude provision of urban services within the 20-year planning period. It is the City's position that the Willamette River is a substantial

physical barrier between Springfield and Seavey Loop; and that the length, width and physical configuration of narrow South Franklin Boulevard corridor and I-5 ramp system linking Springfield to the Seavey Loop area is a physical barrier that creates a high degree of uncertainty about the City's ability to support and deliver urban services, including safe, multi-modal access, to potentially suitable parcels within the 2010-2030 planning period. The corridor is physically and spatially constrained — squeezed between the freeway verge, railroad tracks and the Willamette River Greenway and State parkland, creating substantial physical challenges to providing for safe, logical and efficient delivery of urban services within the planning period. For lands to be suitable to meet the identified needs, lands must be serviceable within the planning period. The City considered materials submitted by JCI/WW and concludes that JCI/WW has not provided substantial evidence to contradict the City's exclusion of Seavey Loop.

In order to justify bringing new employment land into the UGB, Statewide Planning Goal 14 requires the City to consider — as part of our Urban Growth Boundary Location Alternatives Analysis — how public facilities and services can be provided to serve the lands to be added. For this purpose, public facilities and services are defined as water, sanitary sewer, storm water management, and transportation facilities [OAR 660-024-0060 (7)]. Springfield must evaluate and compare "the relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services needed to urbanize alternative boundary locations" [OAR 660-024-0060 (8)]. The evaluation and comparison must include:

> *(a) The impacts to existing water, sanitary sewer, storm water and transportation facilities that serve nearby areas already inside the UGB;*
>
> *(b) The capacity of existing public facilities and services to serve areas already inside the UGB as well as areas proposed for addition to the UGB; and*
>
> *(c) The need for new transportation facilities, such as highways and other roadways, interchanges, arterials and collectors, additional travel lanes, other major improvements on existing roadways and the provision of public transit service.*

When cities expand UGBs, they must demonstrate that they are bringing in land that can be served with urban services within the planning period. As part of the Springfield City Council's review of potential growth areas to accommodate large site employment needs, Council requested a series of work sessions to examine many facets involved in expanding the UGB, ability to deliver services being one important consideration as required by law. In the AIS cover memo for the March 18, 2013 work session entitled "COMPARING POTENTIAL EMPLOYMENT OPPORTUNITY SITES TO ADDRESS 20-YEAR COMMERCIAL AND INDUSTRIAL LAND NEEDS, staff stated:

> "Statewide Planning Goal 14 requires the City to compare the relative costs, advantages and disadvantages of alternative UGB expansion areas with respect to the provision of public facilities and services. As one necessary step towards completing this requirement, Springfield engineering and transportation staff prepared rough "planning level" cost of infrastructure

estimates to compare the cost and difficulty of extending the three City services to each study area."

For that March 18, 2013 Council work session, staff provided an attachment entitled "Estimated Cost & Difficulty of Extending Urban Services" comparing five geographic study areas, Seavey Loop being one. The memo assigned numeric (1-5) rankings — based on the City Engineer's professional opinion —to compare *difficulty* of providing transportation, stormwater and wastewater services and gave *cost range estimates* for each service. The estimated total cost range of >$23->35 Million dollars, compared with $21- 35 Million dollars for North Gateway – a geographic study area that is partially included in the City's UGB expansion— show these cost estimate figures are similar in magnitude. Therefore, it is a leap for JCI/WW to suggest that the City ruled out Seavey on the basis of this comparative cost analysis. A greater difference appears, however, in the numeric ranking comparison of "Total difficulty": 8-11 for Seavey Loop vs. 7 for North Gateway. It is important to note that this difficulty ranking is not based on delivery of water service and cost of delivering water service was not included in the cost estimates.

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(9) "Serviceable" means the city or county has determined that public facilities and transportation facilities, as defined by OAR chapter 660, division 011 and division 012, currently have adequate capacity for development planned in the service area where the site is located or can be upgraded to have adequate capacity within the 20-year planning period.

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

(12) "Suitable" means serviceable land designated for industrial or other employment use that provides, or can be expected to provide the appropriate site characteristics for the proposed use.

Conclusion. JCI/WW has not submitted evidence that land in Seavey Loop provides or can be expected to provide land serviceable within the planning period with the appropriate site characteristics to meet Springfield's identified land needs.

JCI/WW suggests the City should reconsider Goshen. "Goshen" east of I-5 was considered in the study and rejected. In 2008 ECONorthwest prepared maps of potential study areas. The area appears in the maps presented to Council on January 12, 2009 Agenda Item Summary Attachment 1-3. Lands located west of I-5 were not considered because Interstate Highway 5 separates Goshen from Springfield. The Metro Plan establishes Interstate Highway 5 as the jurisdictional boundary between Eugene on the west

side and Springfield on the east side. More recently, the City was asked by Lane County to reconsider Goshen. See November 7, 2016 Agenda Item Summary Attachment 1, Exhibit B for the City's response.

Conclusion. JCI/WW has not submitted evidence that land in Goshen provides or can be expected to provide land serviceable within the planning period with the appropriate site characteristics to meet Springfield's identified land needs.